AC Rochester

P.O. Box 1790
Rochester, New York 14692-1790 USA

June 22, 1994

Mr. Carl Hettenbaugh
Environmental Engineering Technician
Division of Spills Management
NYS Department of Environmental Conservation
6274 East Avon-Lima Road
Avon, New York 14414

~~Rochester Products~~ ~~Rochester Motor~~ RECEIVED
JUN 2 4 1994
SPILLS / PBS
NYS DEC REGION 8

Re: Spill #8801732 Clean-up Activity, AC Rochester Lexington Avenue Facility

Dear Mr. Hettenbaugh:

Per your request, following is a brief description of oil recovery activities conducted since the July 1991 "Tank Farm Oil Recovery Investigation" report previously submitted to your office.

Field activities include the following:

1. Completion of the additional section of oil collection trench from RW-2 to RW-101, as recommended by H & A in the July 1991 report. (Completed in 1991.)
2. A pilot test to evaluate the effect of water table suppression on the rate of oil recovery. (Completed in 1992.)
3. Based on the results of the pilot test, a full scale groundwater pumping system is being installed. (To be completed September 1994.)

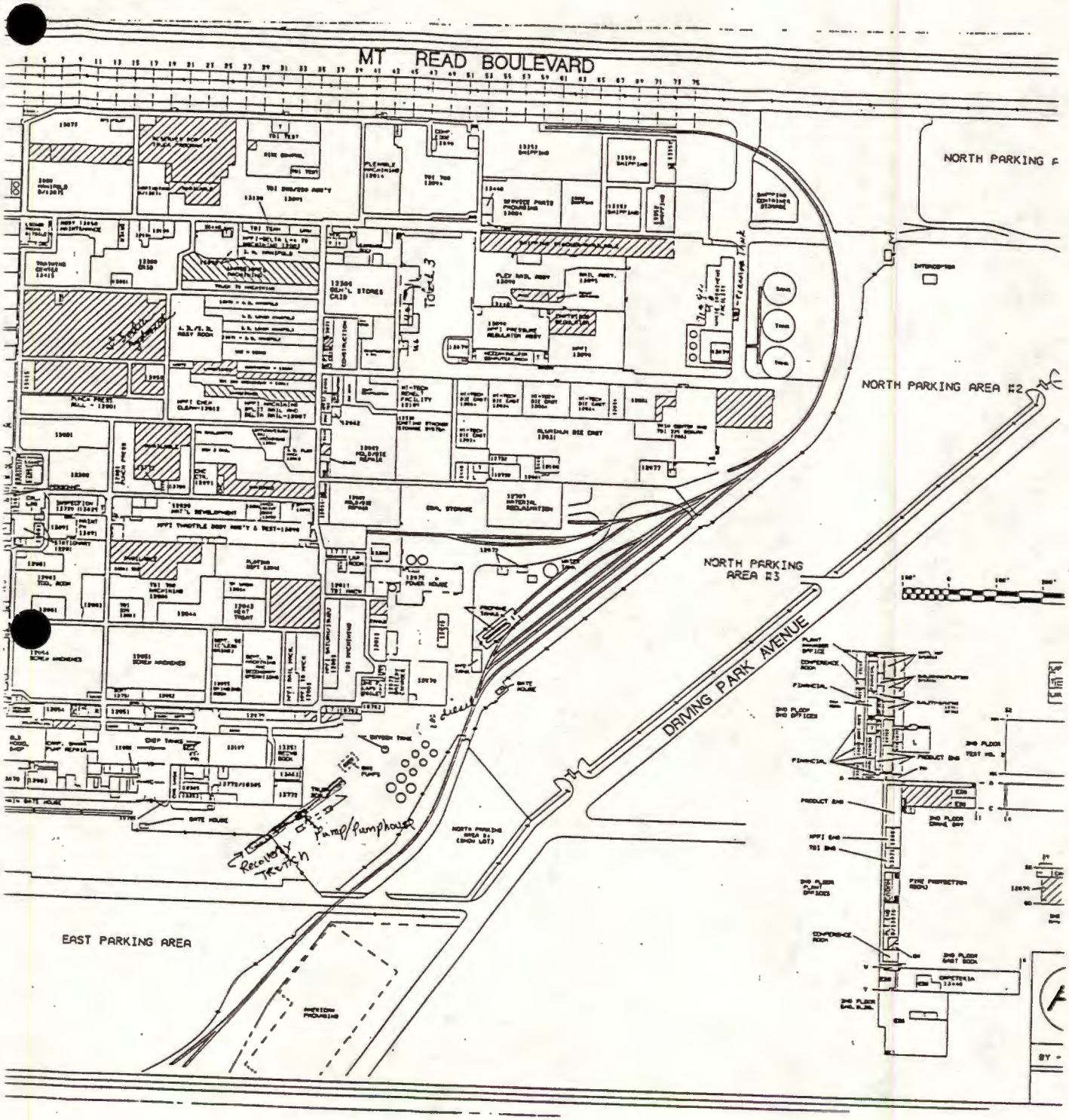
As of May 31, 1991, a total of 32,200 gallons of free product had been recovered from three recovery wells. As of March 31, 1994, an additional 5500 gallons had been recovered, for a total of 37,700 gallons. The current rate of free product recovery is approximately 100 gallons per month.

As we discussed by phone, AC Rochester will submit a full report to your office after installation and start-up of the groundwater suppression system. In the meantime please don't hesitate to call me with any questions.

Sincerely,

Richard C. Eisenman

Richard C. Eisenman
Senior Environmental Engineer


MT READ BOULEVARD
NORTH PARKING AREA #2
NORTH PARKING AREA #3
DRIVING PARK AVENUE
EAST PARKING AREA
Pump/Pumphouse
Recovery Trench
TOWER 3
GATE HOUSE
N

NYSDEC INITIAL SPILL REPORT FORM

DEC REGION# 8 (Avon) SPILL NUMBER 8801732

SPILL NAME: AC ROCHESTER/ROCH PRODUCT DEC LEAD: CH

CALLER'S NAME: MARIA NOTIFIER'S NAME:

CALLER'S AGENCY: CENTRAL OFFICE NOTIFIER'S AGENCY:

CALLER'S PHONE: (518) 457-7362 EXT. NOTIFIER'S PHONE: EXT.

SPILL DATE: 05/25/88 TIME: 11:00

CALL RECEIVED DATE: 05/25/88 TIME: 15:20 RECEIVED BY CID #:

Material Spilled	Mat. Class	Am't Spilled	Units	Am't Recovered
1) NON PCB OIL	(Pet)-Haz-Other-Unk.	13,000	(Gal) - Lbs	0
2)	Pet-Haz-Other-Unk.		Gal - Lbs	
3)	Pet-Haz-Other-Unk.		Gal - Lbs	
4)	Pet-Haz-Other-Unk.		Gal - Lbs	

SPILL LOCATION

PLACE: AC ROCHESTER/ROCH PRODUCT

STREET: 1000 LEXINGTON AVENUE

T/C/V: ROCHESTER CO: MONROE

CONTACT:

PHONE: EXT.

POTENTIAL SPILLER

NAME: ROCHESTER PRODUCTS

STREET: 1000 LEXINGTON AVENUE

CITY: ROCHESTER

STATE: NY ZIP:

CONTACT:

PHONE: (716) 647-7287 EXT.

SPILL CAUSE

Human Error	Tank Test Failure*	Tank Failure
Traffic Accident	Housekeeping	Tank Overfill
Equipment Failure	Deliberate	(Other)
Vandalism	Abandoned Drums	Unknown

SPILL SOURCE

Gas Station	Private Dwelling	Non-Maj Facility
Passenger Vehicle	Vessel	(Comm/Indust)
Comm. Vehicle	Railroad Car	Non-Comm/Instit
Tank Truck	Major Facility	Unknown

RESOURCE AFFECTED

On Land	(Groundwater)	Air
In Sewer	Surface Water**	

**WATERBODY:

SPILL REPORTED BY

(Responsible Party)	Tank Tester	Local Agency
Affected Persons	DEC	Federal Gov't
Police Department	Citizen	Other
Fire Department	Health Dept.	

CALLER REMARKS: TANK NO. 13 AND 21. WHILE REMOVING TANKS, FOUND OIL PRODUCT IN EXCAVATION. FEELS CERTAIN PRODUCT IS FROM THESE TANKS.

*PBS Number	Tank Number	Tank Size	Test Method	Leak Rate

PRIMARY CONTACT CALLED DATE: TIME: hrs. REACHED DATE: TIME: hrs.

SECONDARY CONT. CALLED DATE: TIME: hrs. FAXED BY CID#:

PIN #	T & A	Cost Center	ISR to Central Office
Cleanup Ceased	Meets St'ds NO	Last Inspection	Penalty NO
RP-CUI	ENF-INIT	INVES-COM	CAP
UST Trust Eligible NO	Site: A B (C) D E	Resp. Party 1 2 (3) 4 5 6	Reg Close Date

Created on 06/01/88 Last Updated on 11/15/94 Is Updated? NO EDO DATA INPUT [ ]

Date Printed: 11/13/95

DEC REMARKS

05/25/88: NO. 21 VARSOL - MINERAL SPIRITS NO. 13 CUTTING OIL. 05/26/88: PL AND [illegible] INSPECT TANK 13 (CUTTING OIL) PIT AND FOUND NO CLEANUP NECESSARY OF [illegible]MALLY CONTAMINATED SOIL. TANK 21 (VARSOL) PIT HAD A BLACK LIQUID OBSCURING THE WATER TABLE. 05/26/88: ROCHESTER PRODUCTS WAS SKIMMING OIL WHICH KEPT RECHARGING. PL ALLOWED DECANTING OF WATER IF TOTAL LIQUID REMOVAL WAS PURSUED. 05/26/88: PL ASKED FOR DRAWDOWN OF LIQUID TO DETERMINE MAGNITUDE OF PROBLEM AND THAT TALLY OF RECOVERY KEPT. 07/12/88: TWO TANKS REMOVED 10' TO SOUTH REVEALED OIL POSSIBLY FROM HOLEY DIESEL TANK. AFTER SKIMMING, OIL WAS FOUND ENTERING FROM NW. 07/12/88: ROCH PRODUCT WILL DIG 4TH WEEK OF AUG AT INTERSECTION OF THAT DIRECTION AND SW INFILTRATION DIRECTION INTO VARSOL PIT TO LOCATE SOURCE OR POCKET OF OIL. 08/26/88: PL MET WITH RON CAMPBELL WHO BEGAN RE-SKIMMING UP OIL FROM TANK EXCAVATION WHERE IT HAD RECURRED WITH RAINFALL. ROCHESTER PRODUCTS WILL 1) ANALYZE FOR BTX & COMPARISON WITH OTHER STORED OILS,. 08/26/88: 2) TALLY RECOVERY TO FIGURE RATE, 3) CALL ME FOR HIGH VOLUME DEWATERING LATER ON TO DETERMINE MAGNITUDE OF RESIDUAL PLUME. 10/20/88: 10/20/88 PL FOUND PRODUCT FLOWING STEADILY INTO RECOVERY EXCAVATION FROM DIRECTION OF ABOVEGROUND TANK FARM WHERE MOST OF CONTAINMENT FLOOR WAS COVERED WITH A LAYER OF PRODUCT. 10/20/88: 10/20/88 PL ASKED FOR OIL PICKUP AND MONITORING FLOOR FOR SOURCE, INSTALLATION OF WELL FOR WINTER RECOVERY AND SUBMITTAL OF CHEMICAL ANALYSES OF SPILL AND STORED PRODUCT. 02/27/90: PL FOUND RECOVERY WELL OPERATING BUT AT A SLOW RATE COLLECTING OIL INTO A TANKER TRAILER. RECOVERY INVENTORY BEING KEPT & WILL BE PROVIDED TO DEC PERIODICALLY. 02/27/90: THE NEW MONITORING WELLS ARE BEING MONITORED TO MEASURE EFFECT OF RECOVERY. 06/17/94: CH TELCON W/RICK EISESMAN. A C ROCHESTER STILL RECOVERING PRODUCT FROM TRENCH. RECOVERY HAS DROPPED OFF TO APPROXIMATELY 100 GAL/MONTH. THEY PLAN TO ENHANCE RECOVERY BY IMPLEMENTING ... 06/17/94: ...WATER DEPRESSION IN THE TRENCH. THIS IS PLANNED FOR SOMETIME THIS SUMMER. A FULL REPORT PLANNED FOR THIS FALL. A WRITTEN SUMMARY WILL BE FORWARDED TO THIS DEPT IN 1-2 WEEKS. 07/05/94: AC ROCHESTER SUBMITS UPDATE OF ACTIVITIES AT SITE; ;THEY HAVE [illegible]LETED THE ADDITIONAL SECTION OF OIL COLLECTION TRENCH FROM RW-2 TO RW-101. A PILOT TEST TO EVALUATE THE EFFECTS OF ... 07/05/94: ..WATER TABLE SUPPRESSION ON THE RATE OF OIL RECOVERY (COMPLETED IN 1992). BASED ON THE PILOT TEST A FULL SCALE GROUNDWATER PUMPING SYSTEM IS BEING INSTALLED, TO BE COMPLETED BY SEPT 1994. 09/28/95: This is additional information about material spilled from the translation of the old spill file: CUTTING OIL, VARSOL.

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
REGION 8 OFFICE
6274 EAST AVON-LIMA ROAD, AVON, NY 14414

DATE: 11/1/95 SPILL NO.: 9411659 PIN NO.: INSPECTOR: Carol Herington

LOCATION: GMC Delphi/AC Rochester, 1000 Lexington Ave., Rochester 14603 SPILL NAME: AC Rochester

TOWN: (C) Rochester COUNTY: Monroe TIME: 10:30 Am to 12:30 pM

WEATHER: Cloudy, 60's

INSPECTION NARRATIVE (Sketch, Discussions, Agreements, Observations):

This inspection was a part of an M-P-2 facility inspection for PBS, used Oil, CBS, Fed. UST compliance and progress on spill clean-ups. Carol Herington and Pete Hoffmire met with:

Gail Finkelstein - Supervisor, Envt. Activities
Dennis Grady - Sr. Envt. Project Engineer
Richard Eisenman - SR. Envt. Engineer.

of the General Motors Facility.

The material spilled was Stoddard Solvent. It was spilled into the tank's secondary containment system. GMC plant personnel recovered the product from the containment system and transported it to the facility's waste disposal tank (Tank #96). The hazardous material was removed from the facility by HAZMAT ENVIRONMENTAL GROUP INC. on 1/26/95. A copy of the manifest is attached.

CONTRACTOR & SUBS:

PERSONNEL: TIMES:

EQUIPMENT: TIMES:

NYSDEC INITIAL SPILL REPORT FORM

DEC REGION# 8 (Avon) SPILL NUMBER 9411659
SPILL NAME: A C ROCHESTER DEC LEAD: TW
CALLER'S NAME: GAIL FINKELSTEIN NOTIFIER'S NAME:
CALLER'S AGENCY: AC ROCHESTER SYSTEMS NOTIFIER'S AGENCY:
CALLER'S PHONE: (716) 647-4767 EXT. NOTIFIER'S PHONE: EXT.

SPILL DATE: 12/01/94 TIME: 11:50
CALL RECEIVED DATE: 12/01/94 TIME: 13:05 RECEIVED BY CID #:

	Material Spilled	Mat. Class	Am't Spilled	Units	Am't Recovered
1)	STODDARD SOLVENTS	Pet-Haz-(Other)-Unk.	250	(Gal) - Lbs	0
2)		Pet-Haz-Other-Unk.		Gal - Lbs	
3)		Pet-Haz-Other-Unk.		Gal - Lbs	
4)		Pet-Haz-Other-Unk.		Gal - Lbs	

SPILL LOCATION

PLACE: A C ROCHESTER
STREET: 1000 LEXINGTON TANK FARM
T/C/V: ROCHESTER CO: MONROE
CONTACT:
PHONE: EXT.

POTENTIAL SPILLER

NAME: A C ROCHESTER
STREET: SAME
CITY:
STATE: ZIP:
CONTACT:
PHONE: (716) 647-4767 EXT.

SPILL CAUSE

Human Error	Tank Test Failure*	Tank Failure
Traffic Accident	Housekeeping	Tank Overfill
(Equipment Failure)	Deliberate	Other
Vandalism	Abandoned Drums	Unknown

SPILL SOURCE

Gas Station	Private Dwelling	Non-Maj Facility
Passenger Vehicle	Vessel	(Comm/Indust)
Comm. Vehicle	Railroad Car	Non-Comm/Instit
Tank Truck	Major Facility	Unknown

RESOURCE AFFECTED

(On Land)	Groundwater	Air
In Sewer	Surface Water**	

**WATERBODY:

SPILL REPORTED BY

(Responsible Party)	Tank Tester	Local Agency
Affected Persons	DEC	Federal Gov't
Police Department	Citizen	Other
Fire Department	Health Dept.	

CALLER REMARKS: PIPE SPRUNG A LEAK. ALL MATERIAL CONTAINED IN CONTAINMENT AREA. AC ROCHESTER TO VAUUM UP MATERIAL. THEY WILL NOTIFY URC. CONTACT: CALLER

*PBS Number	Tank Number	Tank Size	Test Method	Leak Rate

PRIMARY CONTACT CALLED DATE: TIME: hrs. REACHED DATE: TIME: hrs.
SECONDARY CONT. CALLED DATE: TIME: hrs. FAXED BY CID#:

PIN #	T & A	Cost Center	SR to Central Office
Cleanup Ceased	Meets St'ds NO	Last Inspection	Penalty NO
P-CUI	ENF-INIT	INVES-COM	CAP
UST Trust Eligible NO	Site: A (B) C D E	Resp. Party 1 2 (3) 4 5 6	Reg Close Date

Created on 12/05/94 Last Updated on 12/05/94 Is Updated? NO EDO DATA INPUT [ ]
Date Printed: 11/13/95

DEC REMARKS

12/01/94: AC DELCO WILL UPDATE DEC AS TO STATUS. MATERIAL WILL BE REUSED OR DISPOSED OF OFFSITE.

STATE OF ARKANSAS
Department of Pollution Control and Ecology
P. O. ox 8913 Little Rock, Arkansas 72219-8913
Telephone 501-562-7444

Rcd on site 11/1/95
C.C. Herington

Please print or type. *(Form designed for use on elite (12-pitch) typewriter.)*

Form Approved. OMB No. 2050-0039. Expires 9-30-94

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: NYD002215234 — Manifest Document No.: 09233
2. Page 1 of 1

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

3. Generator's Name and Mailing Address: AC Delco Systems, 1000 Lexington Avenue, Rochester, NY 14606-
4. Generator's Phone (716) 647-7000

A. State Manifest Document Number: AR- 722481
B. State Generator's ID: SAME

5. Transporter 1 Company Name: Hazmat Environmental Group.Inc
6. US EPA ID Number: NYD980769947
C. State Transporter's ID: PC 0936 H 245
D. Transporter's Phone: 716/827-7200

7. Transporter 2 Company Name:
8. US EPA ID Number:
E. State Transporter's ID: PC ---- H ---
F. Transporter's Phone:

9. Designated Facility Name and Site Address: ENSCO, Inc., American Oil Road, El Dorado, AR 71730-
10. US EPA ID Number: ARD069748192
G. State Facility's ID: SAME
H. Facility's Phone: (501) 863-7173

11. US DOT Description *(Including Proper Shipping Name, Hazard Class, and ID Number)*	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ. WASTE FLAMMABLE LIQUIDS. N.O.S.. Contains(Stoddard Solvent), (CONTAINS STODDARD SOLVENT). 3. UN1993. PG II. (D001). (ERG#27)	001	TT	01260	G	D001
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above
(a) WMDS #293116 (Waste Test Fuels)

If no alternate TSDF, return to generator

9620#

K. Handling Codes for Wastes Listed Above
11A. Incineration (B) T06

EMERGENCY RESPONSE INFORMATION:
Phone: (716) 647-7000
Contact: Plant Security

15. Special Handling Instructions and Additional Information
Load #88623 PO #RPS23377

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 Arkansas state regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volumn 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: RICHARD T. ZWOLAK — Signature: R T Zwolak — Month Day Year: 01 26 95

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Robert Lillie — Signature: Robert Lillie — Month Day Year: 01 26 95

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: — Signature: — Month 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: Dina Jones — Signature: Dina Jones — Month Day Year: 01 30 95

EPA Form 8700-22 (Rev. 9-88) Previous edition is obsolete.

ITEM #9

DELPHI
Automotive Systems

November 16, 1995

Ms Carol C. Herington
New York State D.E.C
6274 East Avon-Lima Road
Avon, NY 14414

Dear Ms Herington:

Please remove tank 31A from our "Bulk Petroleium Registration". The tank was taken out of service September of 1994. It was closed pursuant to 613.9 (b).

If you have any questions please call me at (716) 647-7286.

Sincerely,

Dennis F. Grady, P.E., DEE
Sr. Environmental Engineer

Attachment:

xc: Messrs. R. C. Eisenman
B. Van Vleck
R. T. Zwolak

93-19-1 (8/95)

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SPILLS MANAGEMENT • BUREAU OF SOURCE CONTROL

PETROLEUM BULK STORAGE APPLICATION

Pursuant to the Petroleum Bulk Storage Law,
Article 17, Title 10 of ECL; 6 NYCRR 612-614 and 6 NYCRR, Subpart 360-14.
(Continued on Reverse Side—Please Be Sure to Complete Section B)

Please Type or Print Clearly and Complete All Items

SECTION A—See Instructions on Cover Sheet

PBS NUMBER: 8-124982

Indicate Other Existing DEC Numbers, if any, for this Facility:

CBS Number: B-000163

SPDES Number:

TRANSACTION TYPE (Check all that apply)
NOTE: Transaction Types 1, 2 and 5 may require a fee.

1. ☐ Initial/ New Facility
2. ☐ Change of Ownership
3. ☑ Substantial Tank Modification
4. ☐ Information Correction
5. ☐ Renewal

Geographical Locator for this Facility: (If known)

LATITUDE: 43 10 53 (DEG MIN SEC)

LONGITUDE: 77 35 15 (DEG MIN SEC)

FACILITY

NAME: General Motors Corp. Delphi Energy

LOCATION (Not P.O. Boxes): 1000 Lexington Ave

LOCATION (Continued):

CITY/TOWN/VILLAGE: Rochester | STATE: NY | ZIP CODE: 14606

COUNTY: Monroe | TOWNSHIP OR CITY: Rochester

NAME OF OPERATOR AT FACILITY: Gary Hart | FACILITY TELEPHONE NUMBER: (716) 647-7937

EMERGENCY CONTACT NAME: Dennis F. Grady | EMERGENCY CONTACT PHONE NO.: (716) 647-7286

OWNER

NAME:

ADDRESS (Street and/or P.O. Box):

CITY | STATE | ZIP CODE

FEDERAL TAX ID NO.: 36-05-725-15 | OWNER TELEPHONE NUMBER: (716) 647-7000

TYPE OF OWNER (Check only one)

1 ☐ Private Resident 2 ☐ State Government 3 ☐ Local Government
4 ☐ Federal Government 5 ☑ Corporate/Commercial

TYPE OF PETROLEUM FACILITY:

(Check all that apply)

A. ☐ Storage Terminal/Petroleum Distributor
B. ☐ Retail Gasoline Sales
C. ☐ Other Retail Sales
D. ☑ Manufacturing
E. ☐ Utility
F. ☐ Trucking/Transportation
G. ☐ Apartment Building
H. ☐ School
I. ☐ Farm
J. ☐ Private Residence
K. ☐ Airline (Air Taxi)
L. ☐ Other (Specify)

I hereby certify under penalty of perjury that the information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

NAME OF OWNER OR AUTHORIZED REPRESENTATIVE: Dennis F. Grady | AMOUNT ENCLOSED: $

TITLE: Sr. Environmental Project Eng

SIGNATURE: Dennis Grady | DATE: 11/27/95

MAILING CORRESPONDENCE

ATTENTION: Dennis F. Grady

NAME OF COMPANY:

ADDRESS:

ADDRESS:

CITY/STATE/ZIP CODE:

TELEPHONE NUMBER: ( )

OFFICIAL USE ONLY

Page _____ of _____

Date Received: ____/____/____

Date Processed: ____/____/____

Amount Received $ _____

Reviewed By: _____

PBS NUMBER:

Tank Information for Petroleum Bulk Storage Facility

SECTION B—See Instructions on Cover Sheet

Action	Tank Number	Tank Location	Status	Installation or Permanent Closure Date (MO)		(YR)		Capacity (Gallons)	Product Stored	Tank Type	Tank Internal Prot.	Tank External Protection		Piping Location	Piping Type	Piping Internal Prot.	Piping External Protection		Secondary Containment		Leak Detection		Spill/ Overfill Prevention		Dispenser	Last Test Date (underground Tanks) (MO)		(YR)	
3	31A	2	3	0	9	9	4	550	0																				

KEY FOR SECTION B

ACTION
1 Initial Listing
2 Add Tank
3 Close/Remove Tank
4 Information Correction
5 Recondition/Repair/ Reline Tank

TANK LOCATION
1 Aboveground
2 Aboveground on saddles legs, stilts, rack, or cradle
3 Aboveground: 10% or more below ground
4 Underground
5 Underground, vaulted, with access

STATUS
1 In-service
2 Temporarily out-of-service
3 Closed—Removed
4 Closed—In Place
5 Tank Converted to Non-Regulated Use

PRODUCT STORED
0 Empty
1 Leaded Gasoline
2 Unleaded Gasoline
3 Nos. 1, 2, or 4 Fuel Oil
4 Nos. 5 or 6 Fuel Oil
5 Kerosene
6 Diesel
A Lube Oil
B Used Oil (fuel)
C Used Oil
9 Other*

TANK TYPE
1 Steel/Carbon Steel
2 Stainless Steel Alloy
3 Concrete
4 Fiberglass Coated Steel
5 Fiberglass Reinforced Plastic (FRP)
6 Equivalent Technology
9 Other*

PIPING TYPE
0 None
1 Steel/Iron
2 Galvanized Steel
3 Fiberglass (FRP)
4 Copper
9 Other*

INTERNAL PROTECTION: Tank/Piping
0 None
1 Epoxy Liner
2 Rubber Liner
3 Fiberglass Liner (FRP)
4 Glass Liner
9 Other*

EXTERNAL PROTECTION: Tank/Piping
0 None
1 Painted/Asphalt Coating
2 Sacrificial Anode
3 Impressed Current
4 Fiberglass
5 Jacketed
6 Wrapped (Piping)
9 Other*

PIPING LOCATION
0 None
1 Aboveground
2 Underground
3 Aboveground/Underground Combination

SECONDARY CONTAINMENT
0 None
1 Vault
2 Double-Walled Tank
3 Excavation Liner
4 Cut-off Walls
5 Impervious Underlayment
6 Earthen Dike
7 Prefabicated Steel Dike
8 Concrete Dike
A Synthetic Liner
B Natural Liner
9 Other*

LEAK DETECTION
0 None
1 Interstitial Monitoring
2 Vapor Well
3 Groundwater Well
4 In-tank System
5 Concrete Pad w/channels
6 Double Bottom
9 Other*

SPILL/OVERFILL PREVENTION
0 None
1 Float Vent Valve
2 High Level Alarm
3 Automatic Shut-off
4 Product Level Gauge
5 Catch Basin
6 Vent Whistle
9 Other*

DISPENSER
1 Submersible
2 Suction
3 Gravity

* If Other, please list on separate sheet including the Tank Number

93-19-1 (5/95)—2[illegible]

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SPILLS MANAGEMENT • BUREAU OF SOURCE CONTROL

PETROLEUM BULK STORAGE APPLICATION

Pursuant to the Petroleum Bulk Storage Law,
Article 17, Title 10 of ECL; 6 NYCRR 612-614 and 6 NYCRR, Subpart 360-14.
(Continued on Reverse Side—Please Be Sure to Complete Section B)

Please Type or Print Clearly and Complete All Items

SECTION A—See Instructions on Cover Sheet

PBS NUMBER: 8-124982

Indicate Other Existing DEC Numbers, If any, for this Facility:

CBS Number: 8-000163

SPDES Number:

TRANSACTION TYPE (Check all that apply)
NOTE: Transaction Types 1, 2 and 5 require a fee.

1. ☐ Initial/New Facility
2. ☐ Change of Ownership
3. ☑ Substantial Tank Modification
4. ☑ Information Correction
5. ☐ Renewal

Geographical Locator for this Facility: (If known)

LATITUDE: 43 10 53 (DEG MIN SEC)

LONGITUDE: 77 39 15 (DEG MIN SEC)

FACILITY

NAME: General Motors Corp. Delphi Energy
LOCATION (Not P.O. Boxes): 1000 Lexington Ave
LOCATION (Continued):
CITY/TOWN/VILLAGE: Rochester | STATE: NY | ZIP CODE: 14606
COUNTY: Monroe | TOWNSHIP OR CITY: Rochester
NAME OF OPERATOR AT FACILITY: Gary Hart | FACILITY TELEPHONE NUMBER: (716) 647-7937
EMERGENCY CONTACT NAME: Dennis F. Grady | EMERGENCY CONTACT PHONE NO.: (716) 647-7286

OWNER

NAME: General Motors Corp. Delphi Energy
ADDRESS (Street and/or P.O. Box): 1000 Lexington Ave
CITY: Rochester | STATE: NY | ZIP CODE: 14606
FEDERAL TAX ID NO.: 38-0572515 | OWNER TELEPHONE NUMBER: (716) 647-7000
TYPE OF OWNER (Check only one)
1 ☐ Private Resident 2 ☐ State Government 3 ☐ Local Government
4 ☐ Federal Government 5 ☑ Corporate/Commercial

MAILING CORRESPONDENCE

ATTENTION: Dennis F. Grady
NAME OF COMPANY: General Motors Corp. Delphi Energy & Engine Management
ADDRESS: 1000 Lexington Ave
ADDRESS:
CITY/STATE/ZIP CODE: Rochester, NY 14606
TELEPHONE NUMBER: (716) 647-7286

TYPE OF PETROLEUM FACILITY:
(Check all that apply)

A. ☐ Storage Terminal/Petroleum Distributor
B. ☐ Retail Gasoline Sales
C. ☐ Other Retail Sales
D. ☑ Manufacturing
E. ☐ Utility
F. ☐ Trucking/Transportation
G. ☐ Apartment Building
H. ☐ School
I. ☐ Farm
J. ☐ Private Residence
K. ☐ Airline (Air Taxi)
L. ☐ Other (Specify)

RECEIVED
NOV 15 1995
SPILLS / PBS
NYS DEC REGION 8

I hereby certify under penalty of perjury that the information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

NAME OF OWNER OR AUTHORIZED REPRESENTATIVE: Dennis F. Grady
AMOUNT ENCLOSED: $
TITLE: Sr. Environmental Project Eng
SIGNATURE: [signature]
DATE: 11/13/95

OFFICIAL USE ONLY

Page _____ of _____
Date Received: __/__/__
Date Processed: __/__/__
Amount Received $ _____
Reviewed By: _____

PBS NUMBER: 8-124982

Tank Information for Petroleum Bulk Storage Facility

SECTION B—See Instructions on Cover Sheet

RECEIVED
NOV 15 1995
SPILLS/PBS
NYS DEC REGION 8

Action	Tank Number	*Tank Location	Status	Installation or Permanent Closure Date (MO)	(YR)	Capacity (Gallons)	Product Stored	Tank Internal Prot.	Tank Type	Tank External Protection	Piping Location	Piping Type	Piping Internal Prot.	Piping External Protection	Secondary Containment	Leak Detection	Spill/ Overfill Prevention	Dispenser	Last Test Date (underground Tanks) (MO)	(YR)
2	55	1	1		80	25,300	C	30	1	1	1	1	0	0	8	9	2	2		
2	71	2	1		80	13,800	C	0	1	1	1	1	0	0	8	1	2	2		
2	106	2	1		73	5,000	C	0	1	1	1	1	0	0	6	9	2	2		
2	108	1	1		73	5,500	C	0	1	1	1	1	0	0	0	9	2	2		
2	107	1	1		73	5,500	C	0	1	1	1	1	0	0	0	9	2	2		
4	DAA																			

KEY FOR SECTION B

ACTION
1 Initial Listing
2 Add Tank
3 Close/Remove Tank
4 Information Correction
5 Recondition/Repair/ Reline Tank

TANK LOCATION
1 Aboveground
2 Aboveground on saddles legs, stilts, rack, or cradle
3 Aboveground: 10% or more below ground
4 Underground
5 Underground, vaulted, with access

STATUS
1 In-service
2 Temporarily out-of-service
3 Closed—Removed
4 Closed—In Place
5 Tank Converted to Non-Regulated Use

PRODUCT STORED
0 Empty
1 Leaded Gasoline
2 Unleaded Gasoline
3 Nos. 1, 2, or 4 Fuel Oil
4 Nos. 5 or 6 Fuel Oil
5 Kerosene
6 Diesel
A Lube Oil
B Used Oil (fuel)
C Used Oil
9 Other*

TANK TYPE
1 Steel/Carbon Steel
2 Stainless Steel Alloy
3 Concrete
4 Fiberglass Coated Steel
5 Fiberglass Reinforced Plastic (FRP)
6 Equivalent Technology
9 Other*

PIPING TYPE
0 None
1 Steel/Iron
2 Galvanized Steel
3 Fiberglass (FRP)
4 Copper
9 Other*

INTERNAL PROTECTION: Tank/Piping
0 None
1 Epoxy Liner
2 Rubber Liner
3 Fiberglass Liner (FRP)
4 Glass Liner
9 Other*

EXTERNAL PROTECTION: Tank/Piping
0 None
1 Painted/Asphalt Coating
2 Sacrificial Anode
3 Impressed Current
4 Fiberglass
5 Jacketed
6 Wrapped (Piping)
9 Other*

PIPING LOCATION
0 None
1 Aboveground
2 Underground
3 Aboveground/Underground Combination

SECONDARY CONTAINMENT
0 None
1 Vault
2 Double-Walled Tank
3 Excavation Liner
4 Cut-off Walls
5 Impervious Underlayment
6 Earthen Dike
7 Prefabricated Steel Dike
8 Concrete Dike
A Synthetic Liner
B Natural Liner
9 Other*

LEAK DETECTION
0 None
1 Interstitial Monitoring
2 Vapor Well
3 Groundwater Well
4 In-tank System
5 Concrete Pad w/channels
6 Double Bottom
9 Other* = Visual

SPILL/OVERFILL PREVENTION
0 None
1 Float Vent Valve
2 High Level Alarm
3 Automatic Shut-off
4 Product Level Gauge
5 Catch Basin
6 Vent Whistle
9 Other*

DISPENSER
1 Submersible
2 Suction
3 Gravity

ITEMS #10+11

* If Other, please list on separate sheet including the Tank Number

DELPHI - LEXINGTON AVENUE OPERATIONS
Tank #88 Unleaded Gasoline
Daily Stick Inventory & Weekly Inventory Reconciliation

Procedure:

(1) On normal operating days, (Monday through Friday), measure tank with stick, and convert inch measurement to gallons. Note gallons on chart.
(2) Weekly on Fridays, total disbursement meters, and note total on chart. Enter disbursements into computer.
Note: Deliveries are entered into the computer at time of delivery.
(3) Once disbursements are entered, note updated computer inventory on chart.
(4) Calculate difference between computer inventory and stick inventory , and note it on chart.

	Monday / /	Tuesday / /	Wednesday / /	Thursday / /	Friday / /
STICK INVENTORY gallons (converted from inches)					
DISBURSEMENT METER total in gallons					
COMPUTER INVENTORY gallons (after disbursements)					
DIFFERENCE Stick Inventory less Computer Inventory					

	Monday / /	Tuesday / /	Wednesday / /	Thursday / /	Friday / /
STICK INVENTORY gallons (converted from inches)					
DISBURSEMENT METER total in gallons					
COMPUTER INVENTORY gallons (after disbursements)					
DIFFERENCE Stick Inventory less Computer Inventory					

ITEM # 12

DELPHI - LEXINGTON AVENUE OPERATIONS
Monthly Aboveground Petroleum Tank Inspections
Month/Day/Year: _____/____/_____

Item	Tank # 55 - ABCOR 3	Tank # 71 - AWTA	Tank # 100 - Diesel Fuel	Tank #106 - Interceptor	Tank #107 - CWTA	Tank # 108 - CWTA
TANK CONDITION						
Leaks	Y N	Y N	Y N	Y N	Y N	Y N
Corrosion / Discoloration	Y N	Y N	Y N	Y N	Y N	Y N
Cracks / Bulges / Pitting	Y N	Y N	Y N	Y N	Y N	Y N
Paint	S U	S U	S U	S U	S U	S U
Tank Labels	S U	S U	S U	S U	S U	S U
Gauge Functioning	none	Y N	none	none	none	none
High Level Alarm Working	Y N	none	none	none	Y N	Y N
FOUNDATION/STRUCTURAL						
Settlement / Cracking	Y N	Y N	n/a	n/a	Y N	Y N
Separations	Y N	Y N	Y N	Y N	Y N	Y N
Anchor Bolts Tight	n/a	Y N	Y N	Y N	n/a	n/a
CONTAINMENT SYSTEM						
Cracks, Gaps, Punctures, Separations and/or Corrosion	Y N	Y N	Y N	Y N	none	none
Excessive Vegetation	n/a	n/a	n/a	n/a	n/a	n/a
Paint / Sealant	n/a	n/a	S U	S U	n/a	n/a
Stormwater Buildup	n/a	n/a	Y N	n/a	n/a	n/a
Stormwater Discharge Date(s)						
PIPES, VALVES, PUMPS						
Leakage	Y N	Y N	Y N	Y N	Y N	Y N
Stained Soil	Y N	Y N	Y N	Y N	Y N	Y N
Fills API Color Coded	n/a	n/a	Y N	n/a	n/a	n/a
Paint	S U	S U	S U	S U	S U	S U
Supports	S U	S U	S U	S U	S U	S U
Drainage Valves Locked	Y N	Y N	Y N	Y N	Y N	Y N

Inspector's Initials _____ Y=yes N=no S=satisfactory U=unsatisfactory

Additional Comments: _____

_____

_____

ITEM # 22

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
Petroleum Bulk Storage Program
Facility Information Report

Printed : 01/10/96

PBS # : 8-124982

Site : GENERAL MOTORS CORPORATION
DELPHI ENERGY
1000 LEXINGTON AVENUE
ROCHESTER, NY 14606
County : MONROE Town : ROCHESTER (C)
Latitude : 43|10|53 N Longitude : 77|39|15 W
SPDES# : - CBS# : 8-000163
Site Type : Manufacturing

Operator : GARY HART (716) 647-7937
Emergency : DENNIS F GRADY (716) 647-7286

Site status : Active
Total Active Tanks : 7
Active Capacity : 59,600 gals.

Reg Expires : 03/24/97
Last Inspection : 11/01/95 CCH
Cert Printed : 12/27/95

Site Errors : Complete
Owner Error : Complete
Tank Errors : Complete

Owner : GENERAL MOTORS CORPORATION
1000 LEXINGTON AVENUE
ROCHESTER, NY 14606

Phone : (716) 647-7286
Owner Type : Corporate/Commercial

Mail : GENERAL MOTORS CORPORATION
DELPHI ENERGY
1000 LEXINGTON AVENUE
ROCHESTER, NY 14606
Att : DENNIS F GRADY (716) 647-7286

TankNo	TankLoc	Stat	DateIn	Capac (g)	Product	TankType	TankInt	TankExt	PipeLoc	PipeType	PipeInt	PipeExt	SecCont	Leak	OverFil	Disp	LastTest	NextTest	TStat
055	1	1	12/80	25,300	C	1	0	1	1	1	0	0	8	0	2	2			1
071	2	1	12/80	13,800	C	1	0	1	1	1	0	0	8	9	2	2			1
088	4	1	06/86	2,500	2	1	0	2	2	2	0	2	2	1	15	2			1
100	2	1	09/91	2,000	6	1	0	1	1	2	0	1	7	9	46	2			1
106	2	1	12/73	5,000	C	1	0	1	1	1	0	0	0	9	2	2			1
107	1	1	12/73	5,500	C	1	0	1	1	1	0	0	0	0	2	2			1
108	1	1	12/73	5,500	C	1	0	1	1	1	0	0	0	0	2	2			1
001	4	6	06/57	2,500	2	1				1			0	9		2		CLOSED : 00/00	
002	4	6	06/57	2,500	2	1				1			0	9		2		CLOSED : 00/00	
010	4	3	06/76	1,000	6	5				1			0	9		2		REMOVED : 08/91	
018	4	6	06/57	550	1	1				1			0	9		2		CLOSED : 00/00	
019	4	6	07/57	2,000	2	1				1			0	9		2		CLOSED : 00/00	
031	4	6	09/69	1,000	6	1				1			0	9		2		CLOSED : 00/00	
033	4	6	06/77	5,000	9	5				1			0	9		2		CLOSED : 00/00	
049	4	6	06/79	6,000	2	5				1			0	9		1		CLOSED : 00/00	
31A	2	3	05/84	550	6	1				1			0	9	4	2		REMOVED : 09/94	

KEY FOR SECTION B

ACTION
1 Initial Listing
2 Add Tank
3 Close/Remove Tank
4 Information Correction
5 Recondition/Repair/ Reline Tank

TANK LOCATION
1 Aboveground
2 Aboveground on saddles legs, stilts, rack, or cradle
3 Aboveground: 10% or more below ground
4 Underground
5 Underground, vaulted, with access

STATUS
1 In-service
2 Temporarily out-of-service
3 Closed—Removed
4 Closed—In Place
5 Tank Converted to Non-Regulated Use

PRODUCT STORED
0 Empty
1 Leaded Gasoline
2 Unleaded Gasoline
3 Nos. 1, 2, or 4 Fuel Oil
4 Nos. 5 or 6 Fuel Oil
5 Kerosene
6 Diesel
A Lube Oil
B Used Oil (fuel)
C Used Oil
9 Other*

TANK TYPE
1 Steel/Carbon Steel
2 Stainless Steel Alloy
3 Concrete
4 Fiberglass Coated Steel
5 Fiberglass Reinforced Plastic (FRP)
6 Equivalent Technology
9 Other*

PIPING TYPE
0 None
1 Steel/Iron
2 Galvanized Steel
3 Fiberglass (FRP)
4 Copper
9 Other*

INTERNAL PROTECTION: Tank/Piping
0 None
1 Epoxy Liner
2 Rubber Liner
3 Fiberglass Liner (FRP)
4 Glass Liner
9 Other*

EXTERNAL PROTECTION: Tank/Piping
0 None
1 Painted/Asphalt Coating
2 Sacrificial Anode
3 Impressed Current
4 Fiberglass
5 Jacketed
6 Wrapped (Piping)
9 Other*

PIPING LOCATION
0 None
1 Aboveground
2 Underground
3 Aboveground/Underground Combination

SECONDARY CONTAINMENT
0 None
1 Vault
2 Double-Walled Tank
3 Excavation Liner
4 Cut-off Walls
5 Impervious Underlayment
6 Earthen Dike
7 Prefabricated Steel Dike
8 Concrete Dike
A Synthetic Liner
B Natural Liner
9 Other*

LEAK DETECTION
0 None
1 Interstitial Monitoring
2 Vapor Well
3 Groundwater Well
4 In-tank System
5 Concrete Pad w/channels
6 Double Bottom
9 Other*

SPILL/OVERFILL PREVENTION
0 None
1 Float Vent Valve
2 High Level Alarm
3 Automatic Shut-off
4 Product Level Gauge
5 Catch Basin
6 Vent Whistle
9 Other*

DISPENSER
1 Submersible
2 Suction
3 Gravity

* If Other please list on separate sheet including the Tank Number

93-06-004 (1/91)—26

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

PETROLEUM BULK STORAGE REGISTRATION CERTIFICATE

NYS DEC - REGION 8
6274 E. AVON-LIMA ROAD
AVON, NY 14414
(716) 226-2466

TANK NUMBER	DATE INSTALLED	TANK TYPE	CAPACITY (GALLONS)	DATE LAST TESTED	TESTING DUE DATE	
055	12/80	Steel/Carbon Steel	25,300			*
071	12/80	Steel/Carbon Steel	13,800			*
088	06/86	Steel/Carbon Steel	2,500			
100	09/91	Steel/Carbon Steel	2,000			*
106	12/73	Steel/Carbon Steel	5,000			*
107	12/73	Steel/Carbon Steel	5,500			*
108	12/73	Steel/Carbon Steel	5,500			*

COPY

* Aboveground tanks require monthly visual inspections and may need documented internal inspections as described in 6NYCRR Pt. 613.

ISSUED BY:
Commissioner Michael Zagata

PETROLEUM BULK STORAGE ID NUMBER
8-124982

DATE ISSUED: 01/10/96
EXPIRATION DATE: 03/24/97

FEE PAID
$ 250

MAILING CORRESPONDENCE

DENNIS F GRADY
GENERAL MOTORS CORPORATION
DELPHI ENERGY
1000 LEXINGTON AVENUE
ROCHESTER, NY 14606

OWNER

GENERAL MOTORS CORPORATION
1000 LEXINGTON AVENUE
ROCHESTER, NY 14606

SITE

GENERAL MOTORS CORPORATION
DELPHI ENERGY
1000 LEXINGTON AVENUE
ROCHESTER, NY 14606

OPERATOR (Name and Telephone Number)

GARY HART
(716) 647-7937

EMERGENCY CONTACT (Name and Telephone Number)

DENNIS F GRADY
(716) 647-7286

As an authorized representative of the above named facility, I affirm under penalty of perjury that the information displayed on this form is correct to the best of my knowledge. Additionally, I recognize that I am responsible for assuring that this facility is in compliance with all sections of 6 NYCRR Parts 612, 613 and 614, not just those cited below:

- The facility must be re-registered if there is a transfer of ownership.
- The Department must be notified within 30 days prior to adding, replacing, reconditioning, or permanently closing a stationary tank.
- The facility must be operated in accordance with the code for storing petroleum, 6 NYCRR Part 613.
- Any new facility or substantially modified facility must comply with the code for new and substantially modified facilities, 6 NYCRR Part 614.
- **This certificate must be posted on the premises at all times.** Posting must be at the tank, at the entrance of the facility, or the main office where the storage tanks are located.
- Any person with knowledge of a spill, leak or discharge must report the incident to DEC within two hours **(1-800-457-7362).**

Signature of Authorized Representative/Owner — Date

Name of Authorized Representative/Owner (Please Print)

Title

THIS REGISTRATION CERTIFICATE IS NON-TRANSFERABLE

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
Chemical Bulk Storage Program
Facility Information Report

Printed : 01/12/96

CBS # : 8-000163

Site : GENERAL MOTORS CORP. DELPHI ENERGY & ENGINE MANAGE
1000 LEXINGTON AVE.
ROCHESTER, NY 14603

County : MONROE Town : ROCHESTER (C)
Latitude : 43|10|53 N Longitude : 77|39|15 W
Oper : GARY J. HART (716) 647-7937
Emer : DENNIS F. GRADY (716) 647-7286
Type of Site : Manufacturing

SPDES # :
PBS # : 8-124982 MOSF # :

Site Status : 1 -Active
Total Tanks : 3
Total Capacity : 11,800
Date App. Rcvd : 08/04/95
Amount Paid : 375
Cert. Date : 08/11/95
Renewal Date : 05/01/95
Expiration Date : 08/10/97

Site Stat. : 1 -No Errors
Own Stat. : 1 -No Errors
Tank Stat. : 1 -No Errors

Owner : GENERAL MOTORS CORP. DELPHI ENERGY & ENGINE MANAGE
1000 LEXINGTON AVE.
ROCHESTER, NY 14603

Phone : (716) 647-7000
Owner Type : Corporate/Commercial

Mail : GENERAL MOTORS CORP. DELPHI ENERGY & ENGINE MANAGE
1000 LEXINGTON AVE.
ROCHESTER, NY 14603

Att : DENNIS F. GRADY (716) 647-7000

TankNo	TankLoc	Stat	DateIn	Capac (g)	Casno	Chemical Name	TankType	TankIP	TankEP	TankSC	PipeLoc	PipeType	PipeIP	PipeEP	PipeSC	Leak	Spill	SubDes	%Haz	TStat
91	1	1	05/86	3,400	7664939	Sulfuric acid	1	0	1	1	1	6	0	0	1	5	2	1	96	1
94	1	1	05/86	2,500	7631905	Sodium bisulfite	4	0	1	1	1	6	0	0	1	5	2	1	40	1
100	1	1	01/80	5,900	1310732	Sodium hydroxide	1	0	1	1	1	1	0	0	1	5	2	1	35	1
34	1	5	12/72	20,000	95636		1	0	1	1	1	1	0	0	1	0	2	1	5	CONVERT:08/94
35	1	5	12/72	20,000	95636		1	0	1	1	1	1	0	0	1	0	2	1	5	CONVERT:08/94
36	1	5	12/72	20,000	95636		1	0	1	1	1	1	0	0	1	0	2	1	5	CONVERT:08/94
37	1	5	12/72	20,000	95636		1	0	1	1	1	1	0	0	1	0	2	1	5	CONVERT:08/94
38	1	5	12/72	20,000	95636		1	0	1	1	1	1	0	0	1	0	2	1	5	CONVERT:08/94
39	1	5	12/72	20,000	95636		1	0	1	1	1	1	0	0	1	0	2	1	5	CONVERT:08/94
44	1	5	12/78	50,000	95636		1	0	1	1	1	1	C	0	1	0	2	1	5	CONVERT:08/94
45	1	5	12/78	50,000	95636		1	0	0	1	1	1	0	0	1	0	2	1	5	CONVERT:08/94
46	1	5	12/78	50,000	95636		1	0	1	1	1	1	0	0	1	0	2	1	5	CONVERT:08/94
47	1	5	12/78	50,000	95636		1	0	1	1	1	1	0	0	1	0	2	1	5	CONVERT:08/94

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
50 WOLF ROAD • ALBANY, NEW YORK 12233-3530
TELEPHONE NUMBER (518) 457-4351 OR 1-800-242-4351

HAZARDOUS SUBSTANCE BULK STORAGE REGISTRATION CERTIFICATE

DEC-06-5 (6/88)—9c

Region Number 8

TANK NUMBER	DATE INSTALLED	TANK TYPE	CAPACITY	PRODUCT
91	05/86	Steel/Carbon Steel	3,400	07664-93-9
94	05/86	FRP	2,500	07631-90-5
100	01/80	Steel/Carbon Steel	5,900	01310-73-2

FEE PAID

GENERAL MOTORS CORP. DELPHI ENERG
1000 LEXINGTON AVE.
ROCHESTER, NY 14603

SITE

GENERAL MOTORS CORP. DELPHI ENERG
1000 LEXINGTON AVE.
ROCHESTER, NY 14603

OPERATOR (Name and Telephone Number)

GARY J. HART
(716) 647-7937

EMERGENCY CONTACT (Name and Telephone No.)

DENNIS F. GRADY
(716) 647-7286

As authorized representative of the above named facility(s), I affirm under penalty of perjury that the information displayed on this form is correct to the best of my knowledge. Additionally, I recognize that I am responsible for assuring that this facility is in compliance with all sections of ECL, Article 40.

- The facility must be re-registered if there is a transfer of ownership.
- The Department must be notified within 3 business days prior to adding, replacing, reconditioning, or permanently closing a stationary tank.
- This certificate must be posted at all times. Posting must be at the tank, at the entrance of the site or the main office at the site where the storage tanks are located.
- Any unauthorized discharge or release of a reportable quantity of a hazardous substance(s) shall be reported on the DEC Hot-Line within two hours. (1-800-457-7362)

Signature of Representative _____ Date _____

Name of Representative (Please print) _____

Title of Representative _____

COPY

ISSUED BY: ~~Commissioner Thomas C. Jorling~~

HAZARDOUS SUBSTANCE BULK STORAGE ID NUMBER 8-000163

EXPIRATION DATE 01/12/96 08/10/97

$ 375

OWNER
DENNIS F. GRADY
GENERAL MOTORS CORP. DELPHI ENERGY &
1000 LEXINGTON AVE.
ROCHESTER, NY 14603

NYSDEC SPILL REPORT FORM

DEC REGION# 8 () SPILL NUMBER 9411659

SPILL NAME: A C ROCHESTER DEC LEAD: TW

CALLER'S NAME: GAIL FINKELSTEIN NOTIFIER'S NAME:

CALLER'S AGENCY: AC ROCHESTER SYSTEMS NOTIFIER'S AGENCY:

CALLER'S PHONE: (716) 647-4767 EXT. NOTIFIER'S PHONE: EXT.

SPILL DATE: 12/01/94 TIME: 11:50

CALL RECEIVED DATE: 12/01/94 TIME: 13:05 RECEIVED BY CID #:

	Material Spilled	Mat. Class	Am't Spilled	Units	Am't Recovered
1)	STODDARD SOLVENTS	Pet-Haz-(Other)-Unk.	250	(Gal) - Lbs	250
2)		Pet-Haz-Other-Unk.		Gal - Lbs	
3)		Pet-Haz-Other-Unk.		Gal - Lbs	
4)		Pet-Haz-Other-Unk.		Gal - Lbs	

SPILL LOCATION

PLACE: A C ROCHESTER

STREET: 1000 LEXINGTON TANK FARM

T/C/V: ROCHESTER CO:

CONTACT:

PHONE: EXT.

POTENTIAL SPILLER

NAME: A C ROCHESTER

STREET: SAME

CITY:

STATE: ZIP:

CONTACT:

PHONE: (716) 647-4767 EXT.

SPILL CAUSE

Human Error	Tank Test Failure*	Tank Failure
[illegible]fic Accident	Housekeeping	Tank Overfill
(Equipment Failure)	Deliberate	Other
Vandalism	Abandoned Drums	Unknown

SPILL SOURCE

Gas Station	Private Dwelling	Non-Maj Facility
Passenger Vehicle	Vessel	(Comm/Indust)
Comm. Vehicle	Railroad Car	Non-Comm/Instit
Tank Truck	Major Facility	Unknown

RESOURCE AFFECTED

(On Land)	Groundwater	Air
In Sewer	Surface Water**	

**WATERBODY:

SPILL REPORTED BY

(Responsible Party)	Tank Tester	Local Agency
Affected Persons	DEC	Federal Gov't
Police Department	Citizen	Other
Fire Department	Health Dept.	

CALLER REMARKS: PIPE SPRUNG A LEAK. ALL MATERIAL CONTAINED IN CONTAINMENT AREA. AC ROCHESTER TO VAUUM UP MATERIAL. THEY WILL NOTIFY URC. CONTACT: CALLER

*PBS Number	Tank Number	Tank Size	Test Method	Leak Rate

PRIMARY CONTACT CALLED DATE: TIME: hrs. REACHED DATE: TIME: hrs.

SECONDARY CONT. CALLED DATE: TIME: hrs. FAXED BY CID#:

PIN #	T & A	Cost Center	ISR to Central Office
Cleanup Ceased	Meets St'ds YES	Last Inspection 11/01/95	Penalty NO
RP-CUI	ENF-INIT	INVES-COM	CAP
UST Trust Eligible NO	Site: A (B) C D E	Resp. Party 1 2 (3) 4 5 6	Reg Close Date 01/17/96

Created on 12/05/94 Last Updated on 01/17/96 Is Updated? YES EDO DATA INPUT [ ]

Date Printed: 01/17/96

PrintFor 12/8/95 AAA

DEC REMARKS

12/01/94: AC DELCO WILL UPDATE DEC AS TO STATUS. MATERIAL WILL BE REUSED OR DISPOSED OF OFFSITE.

11/01/95: HERINGTON,HOFFMIRE(DHWR) ON SITE. AC DELCO PROVIDED A COPY OF THE DISPOSAL MANIFEST. MATERIAL DISPOSED OF AT ENSCO, INC. IN EL DORADO, ARKANSAS. NO FURTHER ACTION REQUIRED AT THIS TIME.

Appendix E

Division of Solid and Hazardous Materials

- List of Solid Waste Scrap Awards - 9/94 through 8/95
- 'WE CARE 'Survey - 1996
- Hazardous Waste Compliance Inspection Report - 1/17/96
- Manifest for Disposal of Stoddard Solvent Filters - 11/13/95
- Extension Request Letter for Disposal of Mercury - 11/20/95
- Copy of Manifest for Disposal of Mercury - 12/18/95
- Used Oil Material Safety Data Sheets - 11/15/95
- NYSDEC TSDF Closure Letter - 7/24/90
- Delphi - E Lexington Ave. Site Remediation Program - 11/95
- Hydrogeologic Investigation Migration Control Project, H&A of New York; pg. i ,4 ,8, & 9 - 5/93
- Monthly Groundwater Treatment Results, 1/94 - 9/95
- Treated Groundwater Monthly Flow Rate, 1994 & 1995
- Bureau of Pesticides Inspection Report

SEPTEMBER 1, 1994 Thru Aug. 31, 1995

AC ROCHESTER DIVISION - SCRAP AWARDS

MONTH JANUARY

AP BID MBER	BID DESCRIPTION	SUPPLIER
27	BRASS TURNINGS & RODS, FREE-CUTTING (INCLUDES BRASS COILS)	Frank Metal
27A	EDM Brass WIRE	FRANK METAL
28	BRASS PARTS-CONTAMINATED	Lyell Metal
28A	YELLOW BRASS - CONTAMINATED	Lyell Metal
29	ALUMINUM SLAG	Central Foundry
30	#2 COATED STEEL BUSHELING STEEL	Power Train Sag.
33	CONTAMINATED #2 STEEL WITH RUBBER & PLASTIC	Frank Metal
36	HEAVY INSULATED COPPER WIRE	Lyell Metal
37	COPPER MAGNET WIRE	Lyell Metal
38	BRONZE PUNCHINGS	Lyell Metal
38A	BRONZE TURNINGS	Lyell Metal
40	CARBIDE DRILL BITS/SMALL TOOLS	Frank Metal
42	MAGNESIUM CASTINGS	Lyell Metal
44	LARGE ELECTRIC TRUCK BATTERIES	Lyell Metal
47	BRASS TURNINGS WITH STEEL	Lyell Metal
48	TYPE 400, 405 & 416 CLEAN STAINLESS PARTS (MAGNETIC) & PUNCHINGS	Powertrain Sag.
52	SCRAP DIE CAST MOLDS COMPRISED OF 30% COLD ROLLED STEEL 70% GM H-13 TOOL STEEL	Frank Metal
53	CLEAN SOLID ALUMINUM PARTS - MUST BE MELTED BEYOND REPAIR RECOGNITION.	CENTRAL FOUNDRY
5	ALUMINUM DROSS-DIRTY & OILY	CENTRAL FOUNDRY
37A	COPPER PUNCHINGS (OILY)	LYELL METAL

SEPTEMBER 1, 1994 Thru Aug 31, 1995

AC ROCHESTER DIVISION - SCRAP AWARDS

MONTH JANUARY

SCRAP BID NUMBER	BID DESCRIPTION	SUPPLIER
2A	ALUMINUM SCRAP PIT CLEANINGS, DIRTY & OILY	CENTRAL FOUNDRY
5	CONTAMINATED COPPER BEARING PARTS	Lyell Metal
6A	STAINLESSS STEEL PARTS TYPE 416 CONTAMINATED	Lyell Metal
7	SHORT SHOVELINGS (STEEL)	PowerTrain Sag.
8	MISCELLANEOUS STEEL PUNCHINGS-1008/1010 MATL	PowerTrain Sag.
9	UNPREPARED YARD SCRAP (INCLUDES STEEL BANDS)	Powertrain Sag.
14	GREY IRON CASTINGS (PLAIN & OXIDIZED)	Lyell Metal
15	CAST IRON BORINGS	PowerTrain Sag.
18	ALUMINUM TURNINGS - CLEAN AND DRY	CENTRAL FOUNDRY
18A	ALUMINUM TURNINGS - WET	CENTRAL FOUNDRY
20	ALUMINUM PARTS AND PUNCHINGS - CONTAMINATED	CENTRAL FOUNDRY
21	ALUMINUM PUNCHINGS - CLEAN	CENTRAL FOUNDRY
23	ALUMINUM FLY ASH	CENTRAL FOUNDRY
25	TYPE 300 STAINLESS STEEL PUNCHINGS-CONTAMINATED (NON-MAGNETIC)	Frank Metal
26	TYPE 200 STAINLESS STEEL PUNCHINGS-CONTAMINATED (NON-MAGNETIC)	PowerTrain Sag.

SEPTEMBER 1, 1994 Thru Aug. 31, 1995

AC ROCHESTER DIVISION - SCRAP AWARDS

MONTH JANUARY

SCRAP BID NUMBER	BID DESCRIPTION	SUPPLIER
62	SCRAP STEEL COILS C-1008/1010	———
65A	WET, LONG TURNINGS	PowerTrain Sag.
72A	STAINLESS STEEL TURNINGS, TYPE 416 - WET	PowerTrain Sag.
73	STAINLESS STEEL TURNINGS TYPE - 300 WET	PowerTrain Sag.
80	BENT CARBON BARS	Lyell Metal
81	BENT STAINLESS BARS TYPE 416 MATERIAL	Lyell. Metal
82	ALUMINUM SKIMMINGS	CENTRAL FOUNDRY
83A	ALUMINUM TRIMMINGS AND FLASHINGS - WET	CENTRAL FOUNDRY
84	CASTINGS, GATES, RUNNERS, TRIMMINGS & FLASH - DRY	CENTRAL FOUNDRY

JTHORIZED SIGNATURE ACCOUNTING J. L. Kelly 1/9

JTHORIZED SIGNATURE PURCHASING [signature] 1/9/95

CRAP92.LC-3)

SECTION III - WASTE QUANTITIES

GENERAL MOTORS ANNUAL "WE CARE' SURVEY - 1994

US EPA ID: NYD002215234 Plant Name: LEXINGTON AVE

Waste Type (check one)									Waste Quantity				Waste Management (check one)						Waste Management (check one)		
Haz & Ind	Packaging	Other Plant Trash	Salvage	EMIS Waste Class	Waste Description -Include secondary federal or state/provincial codes -Include UN number for manifested wastes -More than one line may be used	Primary Federal Code	Primary State/Provincial Code	Quantity	Tons	Tonnes	Other	Recycled/Reused	Energy Recovery	Incineration	Other Treatment	Landfill	Remedial Waste	On Site	Off Site - GM	Off Site - Other
X				OILSLDG	ODE			357	X							X				X
X				OILPTRO	WASTE MINERAL OIL			744712	X			X								X
X				WWTSLDG	WASTE WATER TREATMENT SLUDGE			246								X				X
X				OILSYNT	WASTE SOLUBLE OIL			1223048	X			X								X
X				SOLVHAL	DEGREASER WASTE LIQUID	F001		0.00	X			X								X
X				SOIL/DBR	DEGREASER WASTE SOLID	F001		0.92	X					X						X
X				OILLPTRO	RECLAMATION PROJECT OIL			0	X				X							X
X				SLDGNOS	SOLVENT CONTAMINATED SOIL	F001		1.50	X							X				X
X				LIQDNOS	WASTE PET. DIST. LIQUID	D001		8	X				X							X
X				SOIL/DBR	WASTE PET. DIST. SOLID	D001		0.15	X					X						X
X				PNTNPRO	WASTE PAINT	D001		1.45	X					X						X
X				CHEMPROD	WASTE ADHESIVES	D001		0.02	X					X						X
X				THPRASH	FLY ASH			2275	X							X				X
X				POLYRESN	OBSOLETED ROOF TAR			0.70	X							X				X
X				CHEMPROD	WASTE CYANIDE	D003		1.30	X						X					X
		X		PLTRASH	TOTAL PLANT TRASH - DISPOSAL			1174	X							X				X
			X	METAL	SCRAP METAL			13671				X								X
			X	PLASTIC	SCRAP PLASTIC			139				X								X
					PACKAGING WASTE - DISPOSAL															
	X			PAPRPROD	CORRUGATED			170	X			X								X
	X			WOOD	WOOD PALLETS			146					X							X
			X	WOOD	WOOD PALLETS			17				X								
		X			REFACTORY			118								X				X
			X		YARD SCRAP			2401				X								X
	X			DRMEMPT	STEEL DR. 55GAL.			43				X								X
					OTHER CONSTITUENTS (OPTIONAL)															

COPY

January 17, 1996

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Gail F. Finkelstein, CHMM
Supervisor, Environmental Activities
Delphi Energy & Engine Management Systems
1000 Lexington Avenue
Rochester, NY 14692-1790

Dear Ms. Finkelstein:

Re: **Hazardous Waste Compliance Inspection**
Date: October 31, 1995
Location of Handler: Same as above

EPA Identification Number: NYD 002215234

In order to determine compliance with the New York State Hazardous Waste Regulations, the New York State Department of Environmental Conservation conducted an inspection of your facility on the above referenced date.

As a result of that inspection, the Department believes that your facility is operating as a generator of hazardous waste.

6NYCRR Part 373-1.1(d)(1)(iii) requires a generator who accumulates any hazardous waste on-site for a period of 90 days or less, or in quantities less than 8,800 gallons in containers, to meet the following requirements in order to not be subject to the regulations applicable to hazardous waste treatment, storage and disposal facilities (other than the storage of liquid hazardous wastes in the counties of Kings, Nassau, Queens and Suffolk):

- all such wastes are shipped off-site to a permitted treatment, storage or disposal (TSD) facility in 90 days or less.

You have not met the requirement(s) identified above and, therefore, are in violation of 6NYCRR Part 373-1.1(d)(1)(iii).

6NYCRR Part 373-3.3(c) requires that all facilities must be equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment specified below:

- a device, such as a telephone (immediately available at the scene of operations) or a hand-held two-way radio, capable of summoning emergency assistance from local police departments, fire departments, or State of local emergency response teams;

Your facility does not meet the above requirements and, therefore, is in violation of 6NYCRR Part 373-3.3(c).

6NYCRR Part 373-3.10(c)(1) requires that the owner or operator of new tank systems or components ensure that the foundation, structural support, seams, connections, and pressure controls (if applicable) are adequately designed and that the system has sufficient structural strength, compatibility with the wastes to be stored or treated, and corrosion protection so that it will not collapse, rupture or fail. The owner or operator must obtain a written assessment reviewed and certified by an independent, qualified professional engineer attesting that the system has structural integrity and is acceptable for the storing and treating of hazardous waste. This assessment includes, at a minimum, the following information:

- design standards according to which the tanks and ancillary equipment is or will be constructed.

- hazardous characteristics of the wastes to be handled.

- for tank systems or components in which an external metal shell or metal component is or will be in contact with the soil or with water, a determination by a corrosive expert of:

- factors affecting the potential for corrosion, including but not limited to:

- soil moisture content;

- soil pH;

- soil sulfides level;

- soil resistivity;

- structure to soil potential;
- influence of nearby underground metal structures (e.g., piping);
- stray electric current;
- existing corrosion-protection measures (e.g., coating, cathodic protection).
- the type and degree of external corrosion protection that are needed to ensure the integrity of the tank system during the use of the tank system or component, consisting of one or more of the following:
- corrosion-resistant materials of construction such as special alloys, fiberglass-reinforced plastic;
- corrosion-resistant coating (such as epoxy or fiberglass) with cathodic protection (e.g., impressed current or sacrificial nodes);
- electrical isolation devices such as insulating joints and flanges.
- for underground tank systems that are likely to be effected by vehicle traffic, a determination of design or operational measures that will protect the tank system against potential damage.
- design considerations to ensure that:
- tank foundations will maintain the load of a full tank;
- tank systems will be anchored to prevent flotation or dislodgement where the tank system is placed in a saturated zone or within a seismic fault;
- that the system will withstand the effects of frost heave.

You have not met these requirements and, therefore, are in violation of 6NYCRR Part 373-3.10(c)(1).

6NYCRR Part 373-1.1(d)(1)(xii) requires that elementary neutralization or wastewater treatment units meet the following in order to be exempt from permitting:

- all areas, containers and tanks used to treat hazardous waste must be marked with the words "Hazardous Waste" and other words that identify the contents.

You have not met the above requirement(s) and, therefore, are in violation of 6NYCRR Part 373-1.1(d)(1)(xii).

6NYCRR Part 376.5(a)(1)(i) permits a generator to store restricted wastes provided the following conditions are met:

- complies with all storage requirements of 372, 373-1, 373-2, and 373-3 of this title.

- stores all restricted wastes for 90 days or less.

You have not met this requirement and, therefore, are in violation of 6NYCRR Part 376.5(a)(1)(i).

This office has reviewed your submittals (dated November 21 and December 19, 1995) in response to the aforementioned violations. Consequently, the only violation currently outstanding is the certification of Tank #96 by an independent professional engineer (P.E.).

Please confirm in writing within 30 days of the date of this letter that Tank #96 has been certified by an independent P.E. You MUST include your EPA Identification Number on all correspondence. This confirmation should be addressed to:

Clifford Richmond
Engineering Geologist
NYS Department of Environmental Conservation
Division of Solid and Hazardous Materials
6274 East Avon-Lima Road
Avon, NY 14414
(716)226-2466

with a copy to:

Salvatore Carlomagno, P. E.
NYS Department of Environmental Conservation
Division of Solid and Hazardous Materials
Bureau of Hazardous Compliance & Land Management
Hazardous Waste Compliance Section
50 Wolf Road
Albany, NY 12233-7253
(518)457-0532

If you have any questions about this notice or should you wish to discuss this matter further, please contact me at the telephone number above. A copy of the inspection form is enclosed for your information.

Sincerely,

Clifford Richmond
Engineering Geologist

Peter V. Hoffmire, P. E.
Environmental Engineer
M2P2 Team Leader

db
Enclosure

cc: S. Carlomagno
B. Knapp
Monroe County Health Department

47-15-14 (3/95)

Region: 8

INSPECTION FORM

CESQG ___
SQG ___
GENERATOR X
TSDF ___
OTHER ___
UNANNOUNCED ___
ANNOUNCED X

NEW YORK STATE INDUSTRIAL HAZARDOUS WASTE MANAGEMENT ACT
(Chapter 639, Laws of 1978)

Prepared for: Commissioner
NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Send to: NYSDEC
Division of Hazardous Substances Regulation
Compliance Inspection Section
50 Wolf Road - Room 436
Albany, New York 12233-7253

EPA I.D. NUMBER: N Y D 0 0 2 2 1 5 2 3 4

COMPANY NAME (Corporate): Delphi Energy & Engine Management Systems

(Division): _____

COMPANY MAILING ADDRESS: 1000 Lexington Avenue

P.O. Box 1790

City & State Rochester, New York Zip Code 14692-1790

COMPANY LOCATION ADDRESS: _____

(if different than mailing) _____

City & State _____, NY Zip Code _____

COMPANY TELEPHONE NUMBER: (716) 647-4767 Extension _____

FULL NAME OF COMPANY CONTACT: Gail F. Finkelstein, CHMM

TITLE OF COMPANY CONTACT: Supervisor, Environmental Activities

INSPECTION DATE: 10/31/ 1995 TIME OF INSPECTION: 9:00 (a.m.) ____(p.m.)

INSPECTOR'S NAME: Clifford D. Richmond

NAME: _____

REPORT PREPARED BY: Clifford D. Richmond DATE: _____

REPORT APPROVED BY: Clifford Rollins DATE: 1/17/96

TABLE OF CONTENTS

General Information and Classification of Facility

1. Identification of Hazardous Waste - 371 — Yes / No

A. Facility generates and/or stores hazardous waste on-site. — Yes: X / No: ___

(1) X Company filed a RCRA hazardous waste notification and/or Part A of RCRA permit application.

(2) N/A Company has used knowledge of the hazardous characteristic of the waste to determine if it is hazardous.

(3) X Testing has shown characteristics of:

(X) Ignitability (D001) - 371.3(b)
(X) Corrosivity (D002) - 371.3(c)
(X) Reactivity (D003) - 371.3(d)
(X) Toxicity (D004 - 043) - 371.3(e)

(4) X The material is listed in the regulations as a hazardous waste from non-specific sources (F-Waste). 371.4(b).

(5) N/A The waste is listed in the regulations as a hazardous waste from specific sources (K-Waste). 371.4(c).

(6) X* The material is listed in the regulations as an acute hazardous waste (P-Waste). 371.4(d)(5).

(7) X The material or product is listed in the regulations as a discarded commercial chemical product, off-specification species or manufacturing chemical intermediate (U-Waste). 371.4(d)(6).

(8) X The material is listed in the regulations as a waste containing PCBs (B-Waste). 371.4(e).

B. The company notified EPA as a:

TSDF AND GENERATOR

Has EPA or DEC officially modified the company's status? Yes X No___
If yes, attach correspondence.

* Generated in last three years, but not a routine waste.

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

N/A Submitted a Part A application.

N/A Should the Part A be modified by the Company? If so, explain.

N/A

N/A Submitted a Part 373 permit application.

N/A Been granted a Part B permit.* expiration date: N/A

N/A Been granted a Part 373 permit or operating under SAPA with a Part 360 permit.* expiration date: N/A

*Complete Appendix C - indicate compliance status with permit conditions.

D. N/A Is the facility operating under a consent order?**

N/A Have they signed a consent order to resolve violations found during a previous inspection?**

**Complete Appendix D and indicate compliance with each condition of the order.

2. Exemptions

A. Generator Exemptions

(1) N/A Not a regulated handler because:

(a) N/A Never generated any hazardous waste.

(b) N/A No hazardous waste generated within the last 3 years.

(c) N/A Company moved in N/A (date) to N/A (location).

(d) N/A Company out-of-business.

(e) N/A Company sold to N/A (new owner).

(2) N/A Samples collected for testing - 372.1(e)(5).

(3) N/A Residues of hazardous waste in empty containers - 372.1(e)(6).

(4) N/A A hazardous waste which is generated in a product or raw material storage tank, a product or raw material transport vehicle or vessel, a product or raw material pipeline, or in a manufacturing process unit or an associated non-waste treatment manufacturing unit is not subject to regulation until it exits the unit in which it was generated, unless the unit is a surface impoundment,

or unless the hazardous waste remains in the unit more than 90 days after the unit ceases to be operated for manufacturing, or for storage or transportation of product or raw materials - 372.1(e)(7)(i).

B. TSD Exemptions

(1) X Storage of hazardous waste that is generated on-site in containers or tanks for a period not exceeding 90 days. Other than the storage of liquid hazardous waste over the designated sole source aquifers - 373-1.1(d)(1)(iii).

(2) N/A Storage in containers or tanks of liquid hazardous waste generated on-site over the designated sole source aquifers for a period not exceeding 90 days. These storage areas must comply with the requirements of this exemption whenever any quantity of liquid hazardous waste is stored in tanks, or whenever the total quantity of liquid hazardous waste stored on-site in containers exceeds 185 gallons - 373-1.1(d)(1)(iv).

(3) N/A The on-site storage and treatment of hazardous waste by generators that generate less than 100 kilograms of hazardous waste in any calendar month and store less than 1,000 kilograms. The conditionally exempt small quantity generator requirements listed in subdivision 371.1(f) of this Title remain applicable. If at any time the amount of hazardous waste exceeds 1,000 kilograms, this exemption does not apply. This exemption applies to the on-site storage and treatment of acute hazardous wastes only if the generator generates and stores in any calendar month such acute hazardous waste in quantities less than those listed in 373-1.1(d)(1)(i)(b) of this paragraph - 373-1.1(d)(1)(v).

(4) N/A The storage and recycling of the recyclable materials identified in subparagraphs 371.1(g)(1)(iii) and (iv) of this Title - 373-1.1(d)(1)(vi).

(5) N/A The storage of the following recyclable materials is exempt from permitting provided that Subpart 374-1 is complied with. (NOTE: Subpart 374-1 will require that the facility also complies with selected sections of this Part.) - 373-1.1(d)(1)(vii):

(a) N/A recyclable materials used in a manner constituting disposal (see section 374-1.3);

(b) N/A hazardous wastes burned for energy recovery in boilers and industrial furnaces that are not regulated under section 373-2.15 or 373-3.15 of this Title (see section 374-1.8);

(c) N/A recyclable materials from which precious metals are reclaimed (see section 374-1.6);

(d) N/A spent lead-acid batteries that are being reclaimed (see section 374-1.7).

(6) N/A The recycling of hazardous wastes is exempt from permitting provided 373-2.2(c) (identification number), 372.4(b) (use of manifest system), 372.4(d)(1) (manifest discrepancies) and

clause 373-1.1(d)(1)(viii)(d) are complied with. (Storage of hazardous waste prior to recycling is not exempt under this subparagraph.) In addition: 373-1.1(d)(1)(viii):

(a) N/A This exemption is available to:

(1) N/A Commercial facilities that reclaim precious metals, as defined in 374-1.6 of this Title;

(2) N/A Mobile or transportable commercial facilities which operate on the generator's site, if a containment area, meeting the requirements of 373-2.9(f), is provided for the reclaiming facility and any associated, temporary container holding or storage area.

(b) N/A This exemption is not available to any units, other than boilers and industrial furnaces, that burn hazardous wastes for energy recovery.

(c) N/A Exempted processes that recycle the hazardous wastes listed in 2B(5)(a-d) must comply with Part 374 of this Title in lieu of the requirements specified in this subparagraph. (Note: Part 374 will require that the facility also complies with selected sections of this Part.)

(d) N/A Owners or operators of facilities subject to RCRA permitting requirements with hazardous waste management units that recycle hazardous waste are subject to the requirements of sections 373-2.27, 373-2.28, 373-3.27 and 373-3.28 of this Part.

(7) N/A The on-site treatment of hazardous waste, by the generator, in the same tanks or containers used for accumulation and storage is exempt provided the generator complies with Part 373-1.1(d)(1)(iii) and (iv) and Part 372.2(c)(4). Any treatment or placement of hazardous waste in a manner that constitutes land disposal, as defined in subdivision 370.2(b), does not qualify for this exemption - 373-1.1(d)(1)(ix).

(8) N/A Totally enclosed treatment facility - 373-1.1(d)(1)(xi).

(9) X Elementary neutralization units or wastewater treatment units, as defined in Part 370 of this Title, other than units that are part of commercial hazardous waste management facilities as defined in Part 370 of this Title. Elementary neutralization units and wastewater treatment units located at commercial hazardous waste management facilities that are only used to neutralize or treat hazardous waste resulting from the recycling of hazardous wastes or from the reclamation of precious metals from hazardous wastes are also exempt. Elementary neutralization units and wastewater treatment units that are used to commercially neutralize or treat hazardous wastes, generated only at geographically continuous sites, and transported via dedicated pipeline are also exempt - 373-1.1(d)(1)(xii).

(10) N/A Accumulation areas are exempt, provided that they are used to accumulate waste in accordance with the requirements of subparagraph 372.2(a)(8)(i) of this Title - 373-1.1(d)(1)(xiv).

(11) N/A A transporter storing manifested shipments of hazardous waste in containers meeting the requirements of paragraph 372.2(a)(4) of this Title at a transfer facility for a period of ten calendar days or less is exempt, provided that the transfer facility is not located on the site of any commercial hazardous waste treatment, storage or disposal facility subject to permitting under this Part. Complete Part VII - 373-1.1(d)(1)(xi).

3. Hazardous Waste Generation/Treatment/Storage/Disposal

A. Describe only the activities that result in the generation of hazardous waste. Include manufacturing processes that generate hazardous waste. [Do not include hazardous waste treatment processes.]

* SEE ATTACHMENT A *

B. Describe any on-site hazardous waste treatment processes that result in the generation of hazardous waste (exempt and/or nonexempt). Include process diagrams if available.

* SEE ATTACHMENT A *

C. Identify the hazardous wastes that are on-site, the quantity of each, the storage method, the type and size of containers or tanks used and their location in the storage area. (Be as specific as possible.)

(1) Accumulation Areas [NOTE: Waste in accumulation areas must be included as part of the total quantity of waste on-site]:

N/A

(2) Container Storage Areas for CESQG, SQG or Generator*

5 gal pail nicad batteries overpacked in 55-gal drum (D006)*
55 gal steel drum with lithium batteries (D003)*
(2) 55 gal steel drums with Jensen sludge & lime (D002)
5 gal of mercury overpacked in 55 gal steel drum (D009)
(2) 55 gal steel drums with carbon filter/solvent (F001)
(2) 55 gal steel drums with filter/absorbent/solvent (D001)
55 gal steel drum of Solvasol (D001), CYANIDE AREA: (1) 55-gal. steed drum (clothes) & (2) 30-gal steel drums of spent spent cyanide salts solutions(F011) * Universal Wastes

(3) Tank Storage Areas for CESQG,SQG or Generator*

Tank #66: A 5000 gallon carbon steel tank for stoddard solvent. Empty on this day

* CESQG - unlimited storage time provided less than 1,000 kg is stored on-site.

SQG - 180 days (or 270 if TSD is over 200 miles away) and less than 6,000 kg is stored on-site.

Generator - 90 days or less storage.

(4) Interim Status/Permitted Container Storage Areas:

N/A

(5) Interim Status/Permitted Tank Storage Areas:

N/A

(6) Any other treatment, storage or disposal units such as lagoons, surface impoundments, landfills, waste piles, incinerators, energy recovery units, or underground injection units:

N/A

4. Status Identification:

A. Generator Status

(1) ___ Conditionally Exempt Small Quantity Generator (CESQG) - generates less than 100 kg/mo of non-acute hazardous waste or 1 kg/mo of acute hazardous waste. Complete Part III - 372.1(f)(6), 371.1(f)(7).

(2) ___ Small Quantity Generator (SQG) - generates more than 100 kg/mo but less than 1,000 kg/mo of non-acute hazardous, and accumulates no more than 6,000 kg of non-acute hazardous waste on-site. Complete Part IV - 372.2(a)(8)(iii).

(3) X Generator - generates more than 1,000 kg/mo of non-acute hazardous waste or generates more than 1 kg of acute hazardous waste in a calendar month. Complete Part V - 372.2(a)(8)(ii).

B. Treatment, Storage or Disposal Facility (TSDF)

(1) ___ Hazardous waste is stored greater than 90 days.*,**

(2) N/A Hazardous waste is received from off-site and not beneficially used, reused or legitimately recycled or stored.*

(3) N/A Hazardous waste is treated on-site in non-exempt units.*

(4) N/A Hazardous waste is disposed of on-site.*

* (If checked Complete Part VI and/or appropriate Appendices)
** (Do not complete for generators only that have exceeded the 90 day storage limit.)

C. Transporter Status

Yes N/A No ___ Hazardous waste is transported by this company.

If Yes, Complete Part VII Permit No. N/A

Delphi Energy & Engine Management Systems
Multi Media Pollution Prevention (M2P2)
Hazardous Waste Management Inspection
October 31, 1995

Groundwater Treatment

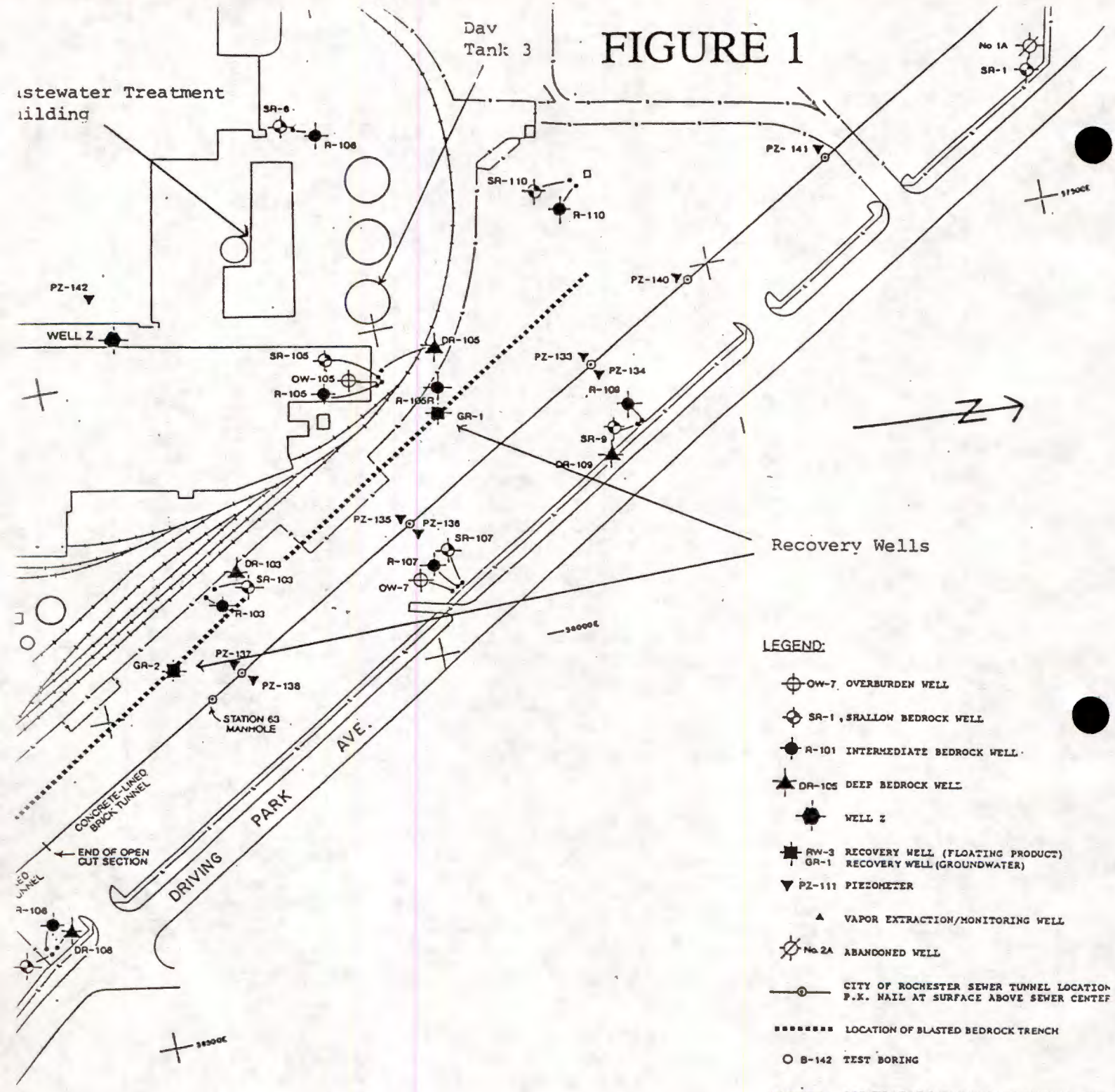
In January of 1990 AC Rochester discovered soil contamination during excavation of a sanitary sewer line at their 1000 Lexington Avenue facility. AC Rochester subsequently initiated a soil vapor investigation of 35 former degreaser locations within their plant consisting of 409 sampling points. Compounds initially identified were: trichloroethylene (TCE), tetrachloroethylene (PCE), 1,1,1-trichloroethane (TCA), cis-1,2-dichloroethylene (DCE), trans-1,2-dichloroethylene (DCE), 1,1-dichloroethylene (DCE) and vinyl chloride.

As investigative activity of soil and groundwater continued it became obvious that contamination from the above chlorinated solvents, as well as benzene, toluene, ethylbenzene, xylene, acetone and 1,1-dichloroethane (DCA) was prevalent across much of the site. Contaminants were detected primarily in overburden, shallow-bedrock and intermediate-bedrock wells. Acetone, benzene and toluene were detected in the deep-bedrock zone (in lesser amounts).

In an attempt to prevent off-site migration of contaminants a 1220′ enhanced-permeability groundwater recovery zone (herein referred to as "the trench") was developed using in-line blasting techniques. The trench was installed parallel to Driving Park Avenue and to approximately 25′ below the top of bedrock. The trench was designed to intercept the north/northeast groundwater flow in the overburden, shallow-bedrock and intermediate-bedrock zones. The location of this man-made zone of enhanced permeability is shown in **FIGURE 1.**

Upon completion of blasting activities two 8" (ID) type 304 stainless steel groundwater recovery wells were installed within the trench. Wells GR-1 and GR-2 were installed 300′ and 860′ from the northwest end of the trench, respectively. Recovery well GR-1 has been operational since May, 1992. Recovery well GR-2 has been operational since June, 1993. Presently, the combined (yearly average) pumping rate of the recovery wells is approximately 70 gpm.

FIGURE 1



LEGEND:

- OW-7 OVERBURDEN WELL
- SR-1 SHALLOW BEDROCK WELL
- R-101 INTERMEDIATE BEDROCK WELL
- DR-105 DEEP BEDROCK WELL
- WELL Z
- RW-3 RECOVERY WELL (FLOATING PRODUCT)
- GR-1 RECOVERY WELL (GROUNDWATER)
- PZ-111 PIEZOMETER
- VAPOR EXTRACTION/MONITORING WELL
- No. 2A ABANDONED WELL
- CITY OF ROCHESTER SEWER TUNNEL LOCATION P.K. NAIL AT SURFACE ABOVE SEWER CENTEF
- LOCATION OF BLASTED BEDROCK TRENCH
- B-142 TEST BORING
- LOCATION OF FLOATING PRODUCT RECOVERY TREN

NOTES:

1. BASE MAP PREPARED BY LOCKWOOD SUPPORT SERVICES INC. BY PHOTOGRAMMETRIC METHODS.
2. MONITORING, RECOVERY WELL, PIEZOMETER AND PK NAIL LOCATIONS SURVEYED BY BERGMANN ASSOCIATES.
3. VAPOR EXTRACTION WELL LOCATIONS MEASURED BY H&A OF NEW YORK.
4. LOCATION OF CITY OF ROCHESTER SEWER TUNNEL DETERMINED BY MONROE COUNTY DIVISION OF PURE WATERS PERSONNEL DURING TUNNEL SURVEY PERFORMED 3 MAY 1991.
5. REFER TO TEXT FOR ADDITIONAL INFORMATION.

H&A of New York
Consulting Geotechnical Engineers, Geologists

DELPHI AUTOMOTIVE SYSTEMS
LEXINGTON AVENUE FACILITY
ROCHESTER, NEW YORK

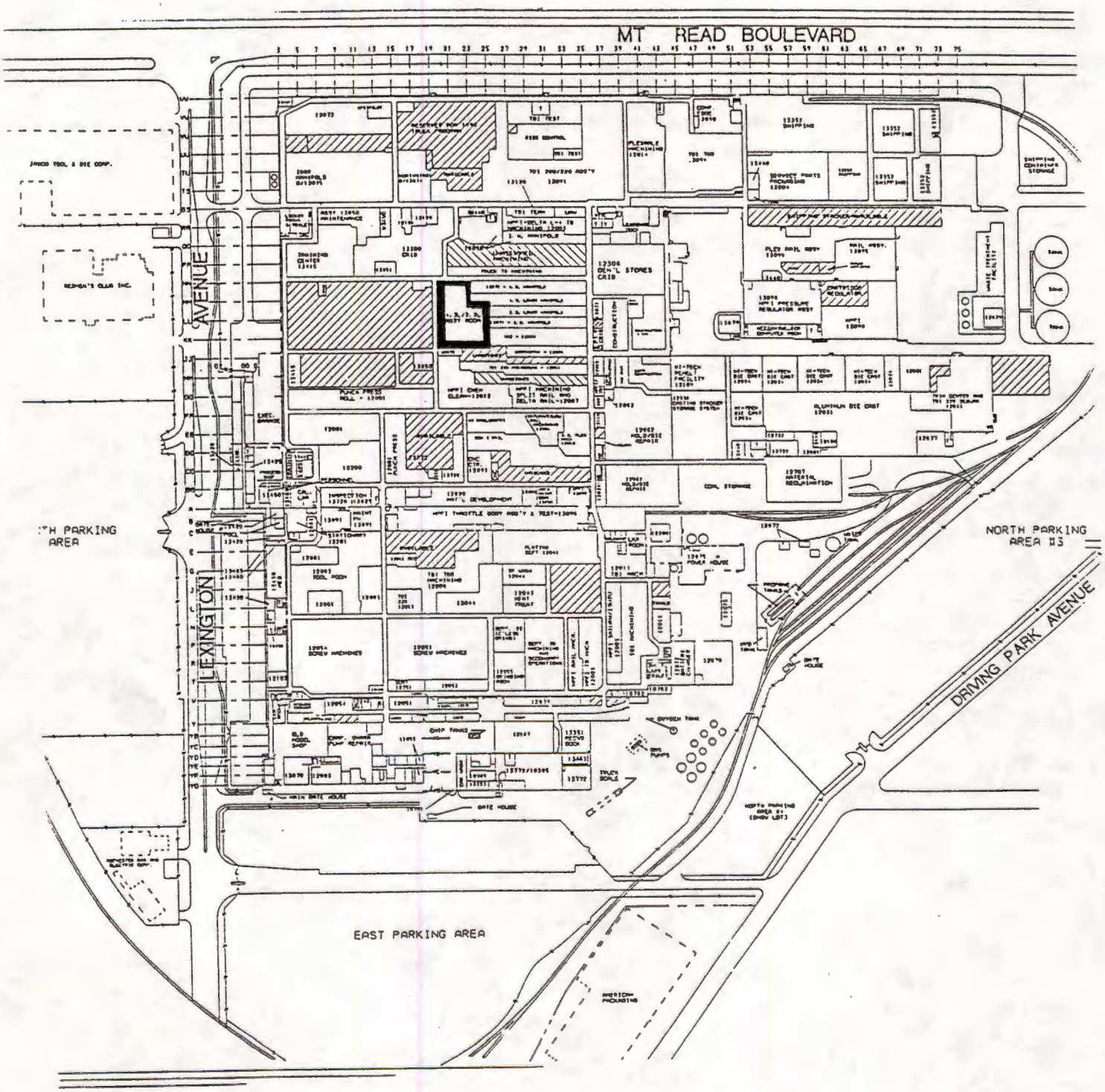
SUBSURFACE EXPLORATION
WELL LOCATION PLAN

Contaminated groundwater is pumped to an 800,000 gallon holding tank (Day Tank #3). From the holding tank groundwater is pumped to the wastewater treatment building where it is treated in a Peroxidation Systems Incorporated (PSI), perox pure™ UV-oxidation, water treatment system. The perox pure™ process destroys dissolved organic contaminants by means of chemical oxidation. Ultravioliet (UV) light acts as a catalyst in this chemical oxidation process in two ways. Ultraviolet light at less than 400 nm wavelength reacts with H_2O_2 molecules to form hydroxyl radicals (OH^-). These resultant chemical oxidants then react with the contaminants in the groundwater. Additionally, the direct absorption of UV light by the contaminants may change the contaminants' chemical structure, making the contaminants more reactive to chemical oxidants.

When the oxidation of organic constituents in water is carried to completion carbon dioxide and water are generated. In the presence of chlorinated contaminants (as in this case) free chloride ions (Cl^-) are also formed. Based on monthly influent/effluent analyses from the peroxidation system between 1/12/94 and 11/08/95 destruction efficiencies for total volatile organic compounds (VOCs) average 98.49% with a standard deviation of 1.87. Effluent concentrations of total organics have consistently been below the established limits of Delpi's sewer-use permit (2.13 mg/L).

The aforementioned remedial activities have taken place voluntarily. There is no permit or consent order in place. However, to date this project has resulted in the installation of 304 soil vapor sampling points, over 70 monitoring wells, a 1220' interceptor trench, two recovery wells and the treatment of approximately 50,404,360 gallons of contaminated groundwater as of September 1995. Additionally, a vapor extraction system consisting of sixteen wells will be on-line in the first half of 1996. The extraction system is located in the Manifold Assembly Room (see **FIGURE 2**) which encompasses one of the most contaminated source areas as identified by initial vapor survey analyses.

FIGURE 2


MT READ BOULEVARD
LEXINGTON AVENUE
NORTH PARKING AREA
NORTH PARKING AREA #3
DRIVING PARK AVENUE
EAST PARKING AREA
Manifold Assembly Room

Part V

LARGE QUANTITY GENERATOR

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

The generator who generates 1,000 kilograms or more per month of non-acute hazardous waste or generates greater than 1 kg per month of acute hazardous waste has complied with the following:

1. General Requirements

(a) ___ The generator has made a determination as to whether or not his solid waste is a hazardous waste - 372.2(a)(2). — X

(b) ___ The generator has obtained an EPA identification number - 372.2(a)(3). — X

(c) ___ Before transporting or offering hazardous waste for * transportation off-site the generator has packaged the waste in accordance with the applicable USDOT regulations - 372.2(a)(4). — N/A

(d) ___ Before transporting or offering hazardous waste for * transportation off-site the generator has labeled each package of waste in accordance with the applicable USDOT regulations - 372.2(a)(5). — N/A

(e) ___ Before transporting or offering hazardous waste for * transportation off-site the generator has marked each container or package of waste properly - 372.2(a)(6). — N/A

* Note: This does not apply to drums in storage.

2. Accumulation Area Requirements - 372.2(a)(i)

(a) ___ The containers appear to be in good condition and are not in danger of leaking - 373-3.9(b). — N/A

(b) ___ Hazardous waste is stored in containers made of compatible materials - 373-3.9(c). — N/A

(c) ___ All containers except those in use are closed - 373-3.9(d)(1). — N/A

(d) ___ Containers holding hazardous waste must not be opened, handled or stored in a manner which may rupture the containers or cause them to leak - 373-3.9(d)(2). — N/A

(e) ___ Containers are marked with the words "Hazardous Waste" and with other words that identify the contents of the containers - 372.2(a)(8)(i)(a)(2). — N/A

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

(f) ___ Hazardous waste may be accumulated in excess of 55 gallons or 1 quart of acutely hazardous waste at or near the point of generation provided that Section 372.2(a)(8)(ii) requirements are met within 3 days, and the container holding the excess accumulation is marked with the date the excess amount began accumulating - 372.2(a)(8)(i)(b). N/A

3. 90 Day Storage - 372.2(a)(8)(ii)

(a) X* All wastes are shipped off-site to an authorized treatment, storage or disposal facility (TSDF) in 90 days or less - 372.2(a)(8)(ii). ___

(b) ___ The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container - 372.2(a)(8)(ii), 373-1.1(d)(1)(iii)(c)(2), 373-1.1(d)(1)(iv)(d). X

Container Storage Requirements (This section will also be completed for TSDF's as referred from Part VI.)

(c) ___ The containers appear to be in good condition and are not in danger of leaking. (If containers are leaking, describe the type, condition, contents and number that are leaking or corroded. Be detailed and specific) - 373-3.9(b). X

N/A

(d) ___ Hazardous waste is stored in containers made of compatible materials - 373-3.9(c). (If not, please explain.) X

N/A

(e) ___ All containers except those in use are closed - 373-3.9(d)(1). X

(f) ___ Containers holding hazardous waste must not be opened, handled or stored in a manner which may rupture the containers or cause them to leak - 373-3.9(d)(2). X

(g) ___ Each container is marked with the words "Hazardous Waste" and with other words to identify the contents - 373-3.9(d)(3). X

(h) ___ The containers and storage area are inspected at least weekly - 373-3.9(e). X

* Also has batteries subject Universal Waste Rule.

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

(i) ___ The generator complies with the following special requirements related to storage of ignitable or reactive wastes - 373-3.9(f): X

(1) ___ Containers holding ignitable or reactive waste are located at least 15 meters (50 feet) from the facility property line - 373-3.9(f). X

(2) ___ Generator has taken precautions to prevent accidental ignition or reaction of ignitable or reactive waste by separating and protecting such waste from sources of ignition or reaction - 373-3.2(h)(1). X

(3) ___ Generator has placed "No Smoking" signs conspicuously wherever there is a hazard from ignitable or reactive waste - 373-3.2(h)(1). X

(j) ___ The generator complies with the following special requirements related to incompatible wastes - 373-3.9(g): N/A

(1) ___ Incompatible wastes, or incompatible wastes and materials, are not placed in the same container, or in an unwashed container that previously held an incompatible waste or material unless the placement is conducted to prevent the following - 373-3.9(g)(1) & (2): N/A

(a) ___ the generation of extreme heat or pressure, fire or explosion, or violent reaction - 373-3.2(h)(2)(i); N/A

(b) ___ production of uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to pose a risk of fire or explosions - 373-3.2(h)(2)(ii); N/A

(c) ___ production of uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions - 373-3.2(h)(2)(iii); N/A

(d) ___ damage to the structural integrity of the device or facility containing the waste - 373-3.2(h)(2)(iv); or N/A

(e) ___ a threat to human health or the environment - 373-3.2(h)(2)(v). N/A

(2) ___ Containers holding a hazardous waste that is incompatible with any waste or other materials stored nearby in other containers, piles, open tanks, or surface impoundments must be separated from the other materials or protected from them by means of a dike, berm, wall, or other device - 373-3.9(g)(3). N/A

(k) ___ Special requirements for generators of liquid hazardous waste over sole source aquifers or generators that store more than 8,800 gallons of liquid hazardous waste - 373-1.1(d)(1)(iii), 373-1.1(d)(1)(iv). N/A

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

(1) ___ The container storage areas are within a secondary containment system designed and operated in accordance with the following* - 373-1.1.(d)(1)(iv)(f): N/A

(a) ___ The base under the containers must be free of cracks or gaps and sufficiently impervious to contain collected material until it is removed - 373-2.9(f)(1)(i). N/A

(b) ___ The base must be sloped or the containment system otherwise designed and operated to drain and remove liquid unless the containers are elevated or protected from contact with accumulated liquids - 373-2.9(f)(1)(ii). N/A

(c) ___ The containment system must have sufficient capacity to contain 10 percent of the volume of containers or the volume of the largest container, whichever is greater. Containers that do not contain free liquids are not considered in this determination - 373-2.9(f)(1)(iii). N/A

(d) ___ Run-on is prevented unless the system has sufficient excess capacity over that required in (3) - 373-2.9(f)(1)(iv). N/A

(e) ___ Accumulated waste and precipitation must be removed as necessary to prevent overflow - 373-2.9(f)(1)(v). N/A

* This requirement does not apply to generators of liquid hazardous waste over a sole source aquifer if the container storage volume does not exceed 185 gallons.

(2) ___ The generator of liquid hazardous waste over a sole source aquifer has a written closure plan - 373-3.7(c)(1). N/A

(3) ___ The closure plan identifies the steps necessary to perform partial and/or final closure of the facility at any point during its active life. The closure plan must contain the information required by 373-3.7(c)(2)(i) - (vii)** - 373-3.7(2)(c). N/A

** If a violation is checked, please attach a sheet listing the deficiencies in the closure plan.

4. Tank Storage Requirements - 373-3.10

1. X Generators must complete Appendix E*, except for 373-3.10(h)(3) Items 11C1 through 5. In addition, 373-3.7 and 3.8 which are cross-referenced do not apply except for 373-3.7(b) and (e).

2. N/A Generators over sole-source aquifers complete Appendix E, except for 373-3.10(h)(3), Items 11C1 through 5 and 373-3.8 (financial requirements).

* Note: Generators storing less than 185 gal of liquid hazardous waste in tanks, do not have to comply with secondary containment requirements given in Appendix E (Pages E-7 to E-10).

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

5. Manifest, Reporting and Recordkeeping Requirements

(a) ___ Hazardous waste is shipped off-site with an accompanying manifest - 372.2(b)(5)(i). X

If "violation" is checked, please elaborate.

N/A

(b) List the frequency of shipments and the amount of waste per shipment.

VARIES

(c) ___ The transporter has a valid Part 364 permit or is otherwise authorized to transport the waste to the designated facility - 372.2(b)(5)(ii). X

List transporter and permit number.

DART TRUCKING, INC. (OH047), HAZMAT ENVIRONMENTAL GROUP (9A278), TONAWANDA TANK (9A080)

(d) ___ The generator offers for shipment or ships hazardous waste to an authorized facility. - 372.2(b)(5)(iii). X
If violation, list names of any unauthorized facilities.

N/A

(e) ___ Each manifest is completed in accordance with the instructions found in Appendix 30 of Part 372 - 372.2(b)(1). [Indicate items in violation]

		Generator	Trans 1	Trans 2	TSDF	
(1) ___	Name of	X	X	___	X	X
(2) ___	EPA ID No. of	X	X	___	X	X
(3) ___	Mailing Address of	X			X	X
(4) ___	Telephone No. of	X	X	___	X	X
(5) ___	Manifest Document #					X
(6) ___	The proper USDOT description.					N/A

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

(7) ___ The appropriate: _X_ quantity, _X_ container number, ___ container type, and _X_ waste type by units of weight or volume. — X

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

(f) ___ The generator has received signed copies (from the TSD facility) of all manifests for wastes shipped off-site more than 35 days ago: — X

___ If not, exception reports have been submitted covering these shipments - 372.2(c)(3). — N/A

(g) ___ The generator must distribute copies of the manifest as specified on the manifest form, postmarked within five (5) business days of the shipment date - 372.2(b)(3). — X

(h) ___ For international shipments the generator has done the following - 372.2(b)(4)(i):

(1) ___ The EPA and the Department have been notified 60 days prior to shipment of the hazardous waste destined for treatment, storage or disposal outside the United States - 372.5(c)(1). — N/A

(2) ___ Delivery of the wastes has been confirmed by the consignee within 90 days of acceptance by initial transporter - 372.5(e)(2). — N/A

(3) ___ Primary exporters of hazardous waste must file with the Administrator and the Department no later than March 1 of each year, a report summarizing the types, quantities, frequency, and ultimate destination of all hazardous waste exported during the previous calendar year - 372.5(f)(1). — N/A

(i) ___ The generator has complied with the requirements of Section 372.6 for interstate shipments - 372.2(b)(4)(ii). — X

(j) ___ The generator has complied with the requirements for shipping by rail or water (bulk) found in Section 372.7 - 372.2(b)(4)(iii). — X

(k) ___ A copy of each manifest has been kept for at least three years from the date the waste was accepted by the initial transporter - 372.2(c)(1)(i). — X

(l) ___ A copy of each Annual Report and Exception Report must be kept for a period of at least three years from the due date of the report - 372.2(c)(1)(ii). — X

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

(m) ___ A generator must keep records of any test results, waste analyses, or other determinations made in accordance with Part 372.2(a)(2) for at least three years - 372.2(c)(1)(iii). X

(n) ___ All records required under subdivision 372.2(c) were furnished upon request, or made available at a reasonable time for inspection - 372.2(c)(1)(iv). X

(o) ___ There is written communication that the designated treatment, storage or disposal facility is an authorized treatment, storage or disposal facility for the particular wastes being offered for shipment and has capacity to accept the hazardous waste set forth on the manifest and will assure the ultimate disposal method is followed - 372.2(b)(2)(i). X

(p) ___ There is written communication that the designated transporter is authorized to deliver the waste to the facility on the manifest - 372.2(b)(2)(ii). X

(q) ___ A generator who ships hazardous waste <u>off-site</u> to a treatment, storage or disposal facility located within the United States must submit an Annual Report on forms specified by the Commissioner - 372.2(c)(2). X

6. <u>Personnel Training</u> - 373-3.2(g)

(a) ___ The following documents and records are maintained at the facility - 373-3.2(g)(4): X

(1) ___ the job title for each position at the facility related to hazardous waste management and name of the employee filling each job - 373-3.2(g)(4)(i); X

(2) ___ a written job description for each position - 373-3.2(g)(4)(ii); X

(3) ___ a written description of the type and amount of both introductory and continuing training that will be given to each person related to hazardous waste management - 373-3.2(g)(4)(iii); and X

(4) ___ records that document that the training or job experience required has been given to and completed by facility personnel - 373-3.2(g)(4)(iv). X

(b) ___ The training program is directed by a person trained in hazardous waste management procedures and must include instruction which teaches facility personnel hazardous waste management procedures <u>(including</u> X

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

contingency plan implementation) relevant to the positions in which they are employed. The components are - 373-3.2(g)(1)(i), (ii) and (iii):

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

(2) ___ Key parameters for automated waste feed cutoff systems; N/A

(3) ___ Communications or alarm systems; X

(4) ___ Response to fires and explosions; X

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

(6) ___ Shutdown of operations. N/A

(c) ___ Facility personnel have successfully completed the program by the effective date of these regulations or six months after the date of their employment - 373-3.2(g)(2). X

(d) ___ Facility personnel have taken part in an annual review of the initial training required - 373-3.2(g)(3). X

(e) ___ Training records on current personnel have been kept permanently at the facility (until closure) - 373-3.2(g)(5). X

(f) ___ Training records on former employees have been kept for at least three years from the date the employee last worked at the facility - 373-3.2(g)(5). X

7. Preparedness and Prevention - 373-3.3

(a) ___ The facility is maintained and operated to minimize the possibility of a fire or explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water - 373-3.3(b). X

(b) X The facility must be equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment specified below - 373-3.3(c): ___

(1) ___ An internal communication or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel - 373-3.3(c)(1); X

Indicate:		Indicate:
X Violations		X Satisfactory NA Not Applicable

(2) X A device, such as a telephone (immediately available at the scene of operations) or a hand-held, two-way radio capable of summoning emergency assistance from local police departments, fire departments, or State or local emergency response teams - 373-3.3(c)(2); ___

(3) ___ Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment - 373-3.3(c)(3); and X

(4) ___ Water at adequate volume and pressure to supply water hose streams, or foam-producing equipment, or automatic sprinklers, or water spray systems - 373-3.3(c)(4). X

(c) ___ Facility communications or alarm systems, fire protection equipment, and spill control equipment are tested and maintained as necessary to assure their proper operation in time of emergency - 373-3.3(d). X

(d) ___ Personnel involved in hazardous waste operations have immediate access to an internal alarm or emergency communication device - 373-3.3(e). N/A

(e) ___ The owner or operator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency unless aisle space is not needed for any of these purposes - 373-3.3(f). X

(f) ___ The facility owner or operator has attempted to make the following arrangements as appropriate with local authorities for the type of waste handled at the facility and the potential need for the services of these organizations - 373-3.3(g)(1): X

(1) ___ Arrangements to familiarize police, fire departments and emergency response teams with the functions and layout of the facility - 373-3.3(g)(1)(i); X

(2) ___ Where more than one police and fire department might respond to an emergency, an agreement designating primary emergency authority to a specific police and a specific fire department, and agreements with any others to provide support to primary emergency authority - 373-3.3(g)(1)(ii); X

(3) ___ Agreements with State emergency response teams, emergency response contractors, and equipment suppliers - 373-3.3(g)(1)(iii); and X

(4) ___ Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could X

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

result from fires, explosions or releases at the facility - 373-3.3(g)(1)(iv).

(g) ___ Where state or local authorities decline to enter into such arrangements, the owner or operator has documented the refusal in the operating record - 373-3.3(g)(2). N/A

8. Contingency Plan - 373-3.4

(a) ___ The facility has a contingency plan or some other emergency plan which incorporates hazardous waste management - 373-3.4(b)(1). X

(b) ___ If the facility has a Spill Prevention, Control, and Countermeasure Plan (SPCC) or some other emergency plan, that plan need only be modified to incorporate hazardous waste management provisions that are sufficient to comply with the Contingency plan requirements - 373-3.4(c)(2). N/A

(c) ___ The following are included in the contingency plan - 373-3.4(c): X

(1) ___ A description of the actions facility personnel must take in response to fires, explosions or any unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil or surface water; 373-3.4(c)(1). X

(2) ___ A description of arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services; 373-3.4(c)(3). X

(3) ___ Names, addresses and office and home phone numbers of all persons qualified to act as emergency coordinator; 373-3.4(c)(4). X

(4) ___ An up-to-date list of all emergency equipment at the facility, and decontamination equipment, where this equipment is required; 373-3.4(c)(5). X

(5) ___ The location and a physical description of each item on the list, and a brief outline of its capabilities; 373-3.4(c)(5). X

(6) ___ An evacuation plan for facility personnel, where there is a possibility that evacuation could be necessary - 373-3.4(c)(6). X

(c) ___ Copies of the contingency plan are maintained at the facility - 373-3.4(d)(1). X

(d) ___ Copies of the contingency plan have been submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams X

that may be called upon to provide emergency services - 373.3.4(d)(2).

(e) ___ The contingency plan has been amended, as necessary, when applicable regulations were revised, the plan failed in an emergency, the facility changes or the list of emergency coordinators or equipment changes - 373-3.4(e). X

(f) ___ There is at least one employee either on the facility premises or on call with the responsibility and authority for coordinating all emergency response measures. This emergency coordinator must be thoroughly familiar with all aspects of the contingency plan, all operations and activities, the facility layout, the location and characteristics of all wastes handled and the location of all records - 373-3.4(f). X

9. Emergency Procedures - 373-3.4(g)

(a) ___ During a past emergency situation the emergency coordinator (or his designee when the emergency coordinator is not on call) immediately activated emergency procedures - 373-3.4(g).* N/A

*Do not go back further than the previous inspection date.

(b) ___ The following was done:

(1) ___ Activated internal facility alarms or communication systems; N/A

(2) ___ Notified appropriate state or local agencies; N/A

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

(4) ___ The emergency coordinator assessed possible hazards to human health and the environment; N/A

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

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

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

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

(8) ___ The emergency coordinator provided for treating, storing or disposing of recovered waste, contaminated soil or surface water, or any other material that resulted from a release, fire or explosion at the facility; N/A

(9) ___ The emergency coordinator ensured that in the affected area no waste that may be incompatible with the released material was treated, stored or disposed of until cleanup procedures were completed; N/A

(10)___ The emergency coordinator ensured that all emergency equipment listed in the contingency plan was cleaned and fitted for its intended use before operations were resumed; N/A

(11)___ The owner or operator notified the Commissioner that the facility is in compliance with Part 373-3.4(g)(8) before operations were resumed in the affected areas of the facility; N/A

(12)___ The owner or operator noted in the operating record the time, date and details of the incident that required implementation of the contingency plan; N/A

(13)___ The owner or operator submitted a complete written report on the incident within 15 days after the incident occurred. N/A

Company Name DELPHI ENERGY & ENGINE MGMT. SYSTEMS

EPA ID# No. N Y D 0 0 2 2 1 5 2 3 4

Region/Inspector 8/CLIFFORD D. RICHMOND

Inspection Date 10-31-95

APPENDIX A
Land Disposal Restrictions

(For small quantity generators, generators and TSD's that are also generators)

I. Waste Identification

A. List the hazardous wastes generated by the company. (List by waste code)

D001 (Stoddard Solvent)

D002 (Jensen sludge & lime)

D007 (wastewater sludge containing hexavalent chromium)

F011 (spent cyanide salts from heat-treating)

II. Dilution Prohibited as a Substitute for Treatment

	YES	NO
A. Other than as described in B. below, has the generator, in any way diluted a restricted waste or the residual from treatment of a restricted waste: - 376.1(c)(1).	___	X
1. As a substitute for adequate treatment to achieve compliance with section 376.4.	___	X
2. To otherwise avoid a prohibition in section 376.3.	___	X

3. To circumvent a land disposal prohibition imposed by Article 27. ___ X

If yes to 1, 2, or 3 above, identify the waste and provide a brief description of the dilution process.
N/A

YES NO

B. Does the generator dilute characteristic hazardous wastes (in a treatment system which treats wastes subsequently discharged to NYS waters) pursuant to SPDES permit or for purposes of pretreatment under the Clean Water Act? [Dilution is permissible unless another method has been specified as the treatment standard in 376.4(c) (Five Letter Technology codes) or unless the waste is a D003 reactive cyanide wastewater or nonwastewater.)] ___ N/A

III. Waste Analysis and Recordkeeping - 376.1(g)

A. **Determination of Wastes Restricted from Land Disposal.**

1. ___ Except as specified in 376.3(b), the generator has determined if his listed wastes are restricted from land disposal - 376.1(g)(1). X

The determination is based on:

a. ___ Testing of the wastes or extracts of the wastes using the test method described in Appendix 35 (TCLP), or X

b. ___ Using knowledge of the wastes X

2. ___ Except as specified in 376.3(b), the generator has determined if his wastes exhibiting one or more characteristics (D001-D043) are restricted from land disposal - 376.1(g)(1). X

The determinaton is based on:

a. ___ Testing of extracts using the test method described in Appendix 20 (EP-tox), or N/A

b. ___ Using knowledge of the wastes. X

3. ___ For ignitable D001 waste (that is not in the High TOC Ignitable Liquids Subcategory* or is not treated by INCIN, FSUBS or RORGS) or corrosive D002 waste that is N/A

prohibited under 376.3(e), the generator has determined what underlying hazardous constituents (as defined in 376.1(b)) are reasonably expected to be present in the D001 or D002 waste - 376.1(g)(1).

* High TOC Ignitable Liquids Subcategory - greater than or equal to 10% total organic carbon.

B. Restricted Wastes not Meeting Treatment Standards.

___ For restricted wastes that do not meet the applicable treatment standards set forth in 376.4 or that exceed the prohibition levels in 376.3(b), the generator has notified the treatment or storage facility in writing. The notice must contain the following information: - 376.1(g)(1)(i). X

1. ___ EPA Hazardous Waste Number - 376.1(g)(1)(i)(a). X
2. ___ The corresponding treatment standards for wastes F001-F005, F039, wastes prohibited under 376.3(b), and for underlying hazardous constituents in D001 and D002 if these wastes are prohibited under 376.3(e). X
3. ___ For all other restricted wastes not included in 2. above: X
   a. ___ The treatment standard, or X
   b. ___ A reference on the notification that, includes: X
      (1) ___ The applicable wastewater or nonwastewater category. X
      (2) ___ The applicable waste specific criteria within a waste code. X
      (3) ___ The section(s) and paragraph(s) where the applicable treatment standard appears. X
4. ___ For treatment standards expressed as specified technologies, the applicable five-letter treatment code - 376.1(g)(1)(i)(b). X
5. ___ The manifest number of the shipment - 376.1(g)(1)(i)(c). X
6. ___ For hazardous debris, the contaminants subject to treatment as provided by 376.4(g)(2) and the following statement: "This hazardous debris is subject to the alternative treatment standards of 376.4(g)" - 376.1(g)(1)(i)(d). N/A
7. ___ Waste analysis data, where available - 376.1(g)(1)(i)(e). X

C. **Restricted Wastes Meeting Treatment Standards.**

___ For restricted wastes that can be land disposed of without further treatment, the generator has submitted a notice and a certification to the treatment, storage, or disposal facility stating that the waste meets the applicable treatment standards and prohibition levels - 376.1(g)(1)(ii). N/A

1. ___ The notice includes the following information: N/A

   a. ___ EPA Hazardous Waste Number - 376.1(g)(1)(ii)(a)(1). N/A

   b. ___ For wastes F001-F005, F039, and wastes prohibited in 376.3(b), the corresponding treatment standards - 376.1(g)(1)(ii)(a)(2). N/A

   c. ___ For all other restricted wastes not included in b. above: - 376.1(g)(1)(ii)(a)(2). N/A

      (1) ___ The treatment standard, or N/A

      (2) ___ A reference on the notification that includes. N/A

         (a) ___ The applicable wastewater or nonwastewater category. N/A

         (b) ___ The applicable waste specific criteria within a waste code. N/A

         (c) ___ The section(s) and paragraph(s) where the applicable treatment standard appears. N/A

   d. ___ For treatment standards expressed as specified technologies, the applicable five-letter treatment code - 376.1(g)(1)(ii)(a)(2). N/A

   e. ___ The manifest number for the shipment - 376.1(g)(1)(ii)(a)(3). N/A

   f. ___ Waste analysis data where available - 376.1(g)(1)(ii)(a)(4). N/A

2. ___ The certification is signed by an authorized representative and makes the required statement - 376.1(g)(1)(ii)(b). N/A

D. **Wastes Exempted from Land Disposal Prohibitions.**

1. ___ For wastes exempted from land disposal prohibitions such as case-by-case extensions, exemptions under 376.1(f), or nationwide capacity variances, with each N/A

shipment the generator has submitted a notice to the facility receiving the waste stating that the waste is not prohibited from land disposal - 376.1(g)(1)(iii).

2. ___ The notice includes the following information. N/A

a. ___ EPA Hazardous Waste number - 376.1(g)(1)(iii)(a). N/A

b. ___ For wastes F001-F005, F039, and wastes prohibited in 376.3(b), the corresponding treatment standards - 376.1(g)(1)(iii)(b). N/A

c. ___ For all other restricted wastes not included in b. above: - 376.1(g)(1)(iii)(b). N/A

(1) ___ The treatment standard, or N/A

(2) ___ A reference, including: N/A

(a) ___ The applicable wastewater or nonwastewater category. N/A

(b) ___ The applicable waste specific criteria within a waste code. N/A

(c) ___ The section(s) and paragraph(s) where the applicable treatment standard appears. N/A

(d) ___ For treatment standards expressed as specified technologies, the applicable five-letter treatment code - 376.1(g)(1)(iii)(b). N/A

d. ___ The manifest number of the shipment - 376.1(g)(1)(iii)(c). __ N/A

e. ___ Waste analysis date, where available - 376.1(g)(1)(iii)(d). N/A

f. ___ For hazardous debris, the contaminants subject to treatment as provided by paragraph 376.4(g)(2) and the following statement: "This hazardous debris is subject to the alternative treatment standards of 376.4(g)" - 376.1(g)(1)(iii)(e). N/A

g. ___ The date the waste is subject to the prohibitions - 376.1(g)(1)(iii)(f). N/A

E. **Treatment of Prohibited Wastes in Containers or Tanks.**

___ For generators managing a prohibited waste in tanks, containers, or containment buildings, regulated under Part 373-1 and treating that waste in those tanks or N/A

containers to meet applicable treatment standards the generator has:

1. ___ Developed and followed written waste analysis plan which describes the procedures the generator will carry out to comply with the treatment standards - 376.1(g)(1)(iv). N/A

2. ___ Kept the plan on-site in the generator's records - 376.1(g)(1)(iv). N/A

3. ___ The following requirements have been met: N/A

   a. ___ The waste analysis plan has been based on a detailed chemical and physical analysis of a representative sample of the prohibited waste(s) being treated, and contains all information necessary to treat the waste(s), including the selected testing frequency - 376.1(g)(1)(iv)(a). N/A

   b. ___ The plan has been filed with the Commissioner to implement Part 376 requirements a minimum of 30 days prior to the treatment activity with delivery verified - 376.1(g)(1)(iv)(b). N/A

   c. ___ Wastes shipped off-site have complied with the notification requirements for restricted wastes meeting treatment standards - 376.1(g)(1)(iv)(c). [Complete Item III.C., pgs. A-4 and A-5.] N/A

F. **Recordkeeping.**

1. ___ If a generator has determined whether a waste is restricted based solely on knowledge of the waste, all supporting data used to make this determination has been retained on-site in the generator's files - 376.1(g)(1)(v). N/A

2. ___ If a generator has determined whether a waste is restricted based on testing of the waste or an extract developed using the test method described in Appendix 35 (TCLP), all waste analysis data has been retained on-site in the generator's files - 376.1(g)(1)(v). X

3. ___ If a generator has determined that he is managing a restricted waste that is excluded from the definition of hazardous or solid waste, or exempt from regulation, under 371, subsequent to the point of generation, the generator has placed in the facility's file a one-time notice stating: - 376.1(g)(1)(vi). N/A

   a. ___ That the waste is generated, N/A

b. ___ That the waste is excluded from the definition of hazardous or solid waste or exempted from regulation, and — N/A

c. ___ The disposition of the waste. — N/A

4. ___ Generators must retain on-site a copy of all notices, certifications, demonstrations, waste analysis data, and other documentation for at least five years from the date that the wastes were last sent to on-site or off-site treatment, storage, or disposal. This requirement applies to solid wastes even when the hazardous characteristic is removed prior to disposal, or when the waste is excluded from the definition of hazardous or solid waste, or exempted from regulation, subsequent to the point of generation - 376.1(g)(1)(vii). — X

G. **Alternate Treatment Standards for Lab Packs.**

1. ___ For generators managing lab packs containing wastes identified in Appendix 38 (organometallics), who wish to use the alternate treatment standards, with each shipment the generator has: - 376.1(g)(1)(viii). — N/A

a. ___ Submitted a notice to the treatment facility in accordance with 376.1(g)(1)(i). [Complete Item III.B., page A-3] — N/A

b. ___ Made a waste determination in compliance with 376.1(g)(1)(v) & (vi). [Complete Items III.F.1-3., pgs. A-6 through A-7.] — N/A

c. ___ Submitted the certification provided in 376.1(g)(1)(viii), signed by an authorized representative. — N/A

2. ___ For generators managing lab packs containing organic wastes specified in Appendix 39, who wish to use the alternate treatment standards, with each shipment the generator has: - 376.1(g)(1)(ix). — N/A

a. ___ Submitted a notice to the treatment facility in accordance with 376.1(g)(1)(i). [Complete Item III.B., page A-3] — N/A

b. ___ Made a waste determination in compliance with 376.1(g)(1)(v) & (vi). [Complete Items III.F.1-3., page A-6 through A-7.] — N/A

c. ___ Submitted the certification provided in 376.1(g)(1)(ix), signed by an authorized representative. — N/A

H. **Small Quantity Generators with Tolling Agreements.**

___ For generators of less than 1,000 kg per calendar month: 376.1(g)(1)(x) N/A

1. ___ The waste is reclaimed under a contractual agreement - 372.2(b)(7)(i). N/A

2. ___ For the initial shipment of such wastes, the generator has complied with the notification and certification requirements that apply for the wastes subject to the tolling agreement - 376.1(g)(1)(x). [Complete Items III.B, C, or D, pgs A-3 through A-5, as applicable, except for manifest requirements.] N/A

3. ___ Small quantity generators must retain on-site a copy of the initial notification and certification, together with the tolling agreement, for at least three years after termination or expiration of the agreement - 376.1(g)(1)(x). N/A

I. **Hazardous Debris.**

___ Generators or treaters who first claim that hazardous debris is excluded from the definition of hazardous waste under paragraph 371.1(d)(5) of this Title, (i.e., debris treated by an extraction or destruction technology provided by Table 1, subdivision 376.4(g), and debris that the commissioner has determined does not contain hazardous waste) are subject to the following notification and certification requirements: 376.1(g)(4). N/A

1. ___ A one-time notification must be submitted to the commissioner to include the following information: 376.1(g)(4)(i). N/A

   a. ___ The name and address of the authorized Part 360 facility receiving the treated debris - 376.1(g)(4)(i)(a). N/A

   b. ___ A description of the hazardous debris as initially generated, including the applicable EPA or NYS Hazardous Waste Number(s) - 376.1(g)(4)(i)(b). N/A

   c. ___ For debris excluded under subparagraph 371.1(d)(5)(i) of this Title, the technology from Table 1, subdivision 376.4(g), used to treat the debris - 376.1(g)(i)(c). N/A

2. ___ The notification must be updated if the debris is shipped to a different facility, and, for debris excluded under subparagraph 371.1(d)(5)(i) of this Title, if a different type of debris is treated or if a different technology is used to treat the debris - 376.1(g)(4)(ii). N/A

IV. Special Rules Regarding Wastes That Exhibit a Characteristic

A. ___ The generator has determined each waste code applicable to the waste in order to determine the applicable treatment standard under section 376.4. For the purposes of Part 376, the waste must carry the code for a listed waste and also any characteristic code if the waste also exhibits that characteristic, except as specified below in Item B. If the generator determines that the waste displays the characteristic of ignitability (D001)(and is not in the High TOC Ignitable Liquids Subcategory or is not treated by INCIN, FSUBS, or RORGS of subdivision 376.4(c), Table 1), or the characteristic of corrosivity (D002), and is prohibited under subdivision 376.3(e) of this Part, the generator must determine what underlying hazardous constituents (as defined in subdivision 376.1(b) of this Part) - 376.1(h)(1). X

B. ___ For a prohibited waste that is listed and also exhibits a characteristic, the treatment standard for the listed waste code will operate in lieu of the standard for the characteristic code, provided the treatment standard for the listed waste includes a treatment standard for the consitituent that causes the waste to exhibit the characteristic. Otherwise the waste must meet the treatment standards for all applicable listed and characteristic codes - 376.1(h)(2). X

C. ___ Prior to land disposal, all prohibited wastes which exhibit a characteristic have been treated to the treatment standards provided in 376.4 - 376.1(h)(3). N/A

D. ___ For characteristic hazardous wastes that have been treated and are no longer hazardous, the initial generator has shipped the wastes to a Part 360 facility and sent the notification and certification to the Commissioner* - 376.1(h)(4). N/A

* Notification is not required to be sent to the Part 360 facility.

1. ___ The notification includes the following information: - 376.1(h)(4)(i). N/A

   a. ___ The name and address of the Part 360 facility receiving the waste - 376.1(h)(4)(i)(a). N/A

   b. ___ A description of the waste as initially generated, including the applicable EPA Hazardous Waste Number(s) and treatability group(s) - 376-1(h)(4)(i)(b). N/A

   c. ___ The treatment standards applicable to the waste at the point of generation - 376.1(h)(4)(i)(c). N/A

2. ___ The certification is signed by an authorized representative and includes the language found in 376.1(g)(2)(v) - 376.1(h)(4)(ii). N/A

V. Prohibitions on Land Disposal

A. Solvent/Dioxin Wastes. - 376.3(a)

1. Does the company generate any of the solvent wastes F001-F005 or any dioxin wastes F020-F023 and F026-F028 that are prohibited from land disposal? _X_ YES ___ NO

(If yes, complete Item 2.)

2. These wastes may be land disposed provided that: 376.3(a)(1)

a. The wastes meet the applicable treatment standards - 376.3(a)(1)(i). _X_ YES ___ NO

b. The company has been granted an exemption from a prohibition pursuant to a petition under 376.1(f) with respect to those wastes covered by the petition - 376.3(a)(1)(ii). ___ N/A YES ___ NO

c. The company has been granted an extension to the effective date of a prohibition - 376.3(a)(1)(iii). ___ N/A YES ___ NO

B. Prohibited Wastes - 376.3(b)(1).

1. Does the company generate any of the following wastes? (If yes, answer Items 2 through 4 below.)

a. Liquid hazardous wastes containing PCB's at concentrations of equal to or greater than 50 ppm - 376.3(b)(1)(i). ___ YES _X_ NO

b. Hazardous wastes containing halogenated organic compounds (HOCs) in concentrations greater than or equal to 1,000 ppm, that are identified as hazardous by a property that does not involve HOCs - 376.3(b)(1)(ii). ___ YES _X_ NO

c. Liquid hazardous wastes that contain over 134 mg/l nickel and/or 130 mg/l of thallium - 376.3(b)(1)(iii). ___ YES _X_ NO

2. These wastes may be land disposed provided that: 376.3(b)(2). N/A

a. Persons have been granted an exemption from a prohibitions, or - 376.3(b)(2)(i). ___ YES ___ NO

b. Persons have been granted an extension to the effective date of a prohibition, or - 376.3(b)(2)(ii). ___ YES ___ NO

c. They meet the applicable treatment standards, or are in compliance with all prohibitions set forth in Part 376 or RCRA section 3004(d) - 376.3(b)(2)(iii). ___ YES ___ NO

3. ___ The wastes found in 1.(a)-(c) above have been subjected to the Paint Filter Liquids Test to determine if they are liquids - 376.3(b)(3). N/A

4. ___ The initial generator of a liquid hazardous waste containing PCBs or a liquid or nonliquid hazardous waste containing HOCs has tested the waste (not an extract or filtrate) or used knowledge of the waste to determine if the waste equals or exceeds the specified prohibition levels (50 ppm for PCBs, 1,000 ppm for HOCs) - 376.3(b)(4). N/A

C. **Prohibited Waste Found in 376.3(c) [First, Second, and Third Third Wastes].**

1. ___ The initial generator has tested a representative sample of the waste extract or the entire waste, depending on whether the treatment standards are expressed as concentraction in the waste extract or the waste, or used knowledge of the waste to determine if it exceeds the applicable treatment standards - 376.3(c)(7). X

D. **Waste Specific Prohibitions - Ignitable and Corrosive Characteristic Wastes.**

1. ___ The wastes specified in 6 NYCRR 371.3(b) as D001 (and is in not the High TOC Ignitable Liquids Subcategory), and specified in 371.3(c) as D002, that are managed in systems other than those whose dischage is regulated under Titles 7 and 8 of Article 17 of the ECL, the Clean Water Act (CWA) (see subdivision 370.1(e)), or that inject in Class 1 deep wells regulated under the Safe Drinking Water Act (SDWA) (see subdivision 370.1(e)), or that are zero dischargers that engage in Title 7 and 8 or CWA-equivalent treatment before ultimate land disposal, are prohibited from land disposal. Title 7 and 8 and/or CWA-equivalent treatment means biological treatment for organics, alkaline chlorination of ferrous sulfate precipitation for cyanide, precipitation/sedimentation for metals, reduction of hexavalent chromium, or other technology that can be demonstrated to perform equally or greater than these technologies* - 376.3(d). X

* (Note: Deep well injection of hazardous waste is not allowed in New York State.).

E. **Variance From a Treatment Standard. - 376.4(e)**

1. Has the generator submitted a petition for a variance from a treatment standard where the treatment standard is expressed as a concentration in the waste or waste extract and the waste cannot be treated to the specified level, or where the treatment technology is not appropriate to the waste? ___ YES _X_ NO

   If yes, complete Items (a) and (b) below. N/A

   (a) ___ A generator that is managing a waste covered by a variance from a treatment standard has complied with the waste analysis requirements for a restricted waste - 376.4(e)(6). ___

   (b) ___ During the petition review process, the applicant has complied with all restrictions on land disposal - 376.4(e)(7). ___

2. Has the generator submitted a petition for a site-specific variance from a treatment standard where the treatment standard is expressed as a concentration in the waste or waste extract and the waste which is generated under conditions specific only to one cannot be treated to the specified level, or the treatment technology is not appropriate to the waste? ___ YES _X_ NO

   If yes, complete Items (a) and (b) below. N/A

   (a) ___ The generator, treatment facility or disposal facility managing a waste covered by a site-specific variance from a treatment standard has complied with the waste analysis requirements for a restricted waste - 376.4(e)(11). ___

   (b) ___ During the application review process, the applicant has complied with all restrictions on land disposal - 376.4(e)(12). ___

IX. Prohibition on Storage of Restricted Wastes* - 376.5(a)

A. _X_ The storage of hazardous wastes restricted from land disposal is permitted provided that: - 376.5(a)(1). ___

1. ___ The small quantity generator has: N/A

   a. ___ Stored restricted waste in tanks or containers on-site solely for the purpose of the accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment, or disposal - 376.5(a)(1)(i). N/A

b. ___ Complied with all storage requirements of 372, 373-1, and 373-3 - 376.5(a)(1)(i). N/A

c. ___ Stored all restricted wastes for 180/270 days or less - 376.5(a)(1)(i). N/A

2. ___ The generator has:

a. ___ Stored restricted waste in tanks or containers on-site solely for the purpose of the accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment, or disposal - 376.5(a)(1)(i). X

b. X Complied with all storage requirements of 372, 373-1, 373-2, and 373-3 - 376.5(a)(1)(i). ___

c. X Stored all restricted wastes for 90 days or less - 376.5(a)(1)(i). ___

Company Name DELPHI ENERGY AND ENGINE MANAGEMENT SYSTEMS

EPA ID# No. N Y D 0 0 2 2 1 5 2 3 4

Region/Inspector 8/CLIFFORD D. RICHMOND

Inspection Date 10-31-95

APPENDIX E

TANK SYSTEMS

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

N/A

1. General Information

A. 1. Existing tank system (tank in operation or installation commenced on or prior to July 14, 1986) ___ Yes ___ No
If yes, give date installed or age of tank: _____

2. New tank system (tank installed after July 14, 1986) X Yes ___ No
If yes, give date installed: 1987

B. 1. Aboveground tank X Yes ___ No Inground tank ___ Yes ___ No
2. Underground tank ___ Yes ___ No Onground tank ___ Yes ___ No

C. Type of tank and capacity (e.g. stainless steel, fiberglass)

5000 GALLON CARBON STEEL TANK (#66)

2. Schedule For Secondary Containment - 373-3.10(d)

(Check each applicable item.)

A. X for all new tank systems or components for which construction was started after July 14, 1986, secondary containment must be provided prior to putting the tank system or component into service - 373-3.10(d)(1)(i);

B. N/A for all existing tanks used to treat or store F020-F023, F026 and F027 wastes, secondary containment must be provided by January 12, 1989 - 373-3.10(d)(1)(ii);

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

C. N/A for existing non-enterable underground tanks and tank systems, of known and documented age, secondary containment must be provided by January 12, 1989, or when the tank systems have reached 15 years of age, whichever comes later *(except for generators of liquid hazardous waste located over a sole source aquifer)* - 373-3.10(d)(1)(iii);

D. N/A for existing non-enterable underground tanks and tank systems for which the age cannot be documented, secondary containment must be provided by January 12, 1995, unless the age of the facility is greater than seven (7) years, then secondary containment must be provided by the time the facility reaches 15 years of age or by January 12, 1989, whichever comes later *(except for generators of liquid hazardous waste located over a sole source aquifer)* - 373-3.10(d)(1)(iv);

E. 1. N/A as specified in Items 6C4 and 6E1(a) through (c) for existing generators of liquid hazardous waste in *Kings, Queens, Nassau and Suffolk Counties*, secondary containment must be provided by December 31, 1987 - 373-3.10(d)(1)/ 373-1.1(d)(1)(iv)(f)(3);

2. N/A for these generators, all other secondary containment requirements of 373-3.10(d) must be satisfied by the dates specified in 2A through 2F above;

F. N/A for generators of liquid hazardous waste located in the *Schenectady/Niskayuna Aquifer System in Schenectady, Saratoga, and Albany Counties or the Clinton Street - Ball Park Valley Aquifer in Broome and Tioga Counties*, secondary containment must be provided by December 31, 1988, as specified in Items 2E1 and 2E2 above - 373-3.10(d)(1)/373-1.1(d)(1)(iv)(f)(4);

G. X for all other tank systems, secondary containment must be provided within the time intervals specified in Items 2C, 2D and 2E above - 373-3.10(d)(1)(v);

H. N/A for tank systems that store or treat materials that become hazardous wastes after January 14, 1994, secondary containment must be provided within the time intervals specified in Items 2A through 2G above - 373-3.10(d)(1)(vi).

3. Schedule for Assessment of Existing Tank System's Integrity - 373-3.10(b)

A. ___ For each existing tank system that does not have secondary containment meeting the requirements of subdivision 373-3.10(d), the owner or operator must determine that the tank system is not leaking or is unfit for use. Except as provided in 373-3.10(d)(3) of this subdivision, the owner or operator must obtain and keep on file at the facility a written assessment reviewed and certified by an independent, qualified, professional engineer registered in New York that attests to the tank system's integrity by December 25, 1989 - 373-3.10(b)(1). N/A

B. ___ The professional engineer signing the assessment has made the following certification: "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsbile for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false inforamtion, including the possibility of fine and imprisonment" - 373-3.10(b)/373-1.4(a)(5)(iv). N/A

4. Assessment of Existing Tank System's Integrity - 373-3.10(b)

A. ___ The assessment must determine that the tank system is adequately designed and has sufficient structural strength and compatibility with the wastes to be stored or treated to ensure that it will not collapse, rupture, or fail. At a minimum, the assessment considers the following - 373-3.10(b)(1): N/A

1. ___ design standards, if available, according to which the tank and ancillary equipment were constructed - 373-3.10(b)(2)(i); N/A

2. ___ hazardous characteristics of the wastes that have been or will be handled - 373-3.10(b)(2)(ii); N/A

3. ___ existing corrosion protection measures - 373-3.10(b)(2)(iii); N/A

4. ___ documented age of the tank system, if available (otherwise, an estimate of the age) - 73-3.10(b)(2)(iv); and N/A

5. ___ results of a leak test, internal inspections or other tank integrity examination such that: N/A

(a) ___ for non-enterable underground tanks, this assessment must consist of a leak test that is capable of taking into account the effects of temperature variations, tank defection, vapor pockets and high water table effects - 373-3.10(b)(2)(v)(a); and N/A

(b) ___ for other than non-enterable underground tanks and for ancillary equipment, the assessment is either a leak test (as described above) or an internal inspection and/or tank integrity examination certified by an independent P.E. that addresses cracks, leaks, corrosion, and erosion - 373-3.10(b)(2)(v)(b). N/A

B. ___ Tank systems that store or treat materials that become hazardous wastes after December 25, 1988, must conduct this assessment within 12 months after the date that the waste becomes a hazardous waste - 373-3.10(b)(3). N/A

C. ___ If, as a result of the assessment, a tank system is found to be leaking or unfit for use, the owner or operator has complied with the requirements of 373-3.10(g) - 373-3.10(b)(4). [Complete Item 10.] N/A

5. Assessment of New Tank Systems or Components - 373-3.10(c)

A. X The owner or operator has obtained a written assessment reviewed and certified by an independent P.E. attesting that the system has sufficient structural integrity and is acceptable for the storing and treating of hazardous waste - 373-3.10(c)(1). ___

B. ___ This assessment includes, at a minimum, the following information: N/A

1. ___ design standards according to which the system is or will be constructed - 373-3.10(c)(1)(i); N/A

2. ___ hazardous characteristics of the wastes to be handled - 373-3.10(c)(1)(ii); N/A

3. ___ for new tank systems, or components in which the external shell of a metal tank or any external metal component of the tank system is or will be in contact with the soil or with water, a determination by a corrosion expert of - 373-3.10(c)(1)(iii): N/A

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

(a) ___ factors affecting the potential for corrosion, including but not limited to - 373-3.10(c)(1)(iii)(a). N/A

(1) ___ soil moisture content N/A
(2) ___ soil pH N/A
(3) ___ soil sulfides level N/A
(4) ___ soil resistivity N/A
(5) ___ structure to soil potential N/A
(6) ___ influence of nearby underground metal structures (e.g., piping) N/A
(7) ___ stray electric current N/A
(8) ___ existing corrosion - protection measures N/A

(b) ___ the type and degree of external corrosion protection that are needed to ensure the integrity of the tank system during the use of the tank system, consisting of one or more of the following - 373-3.10(c)(1)(iii)(b): N/A

(1) ___ corrosion-resistant material of construction - 373-3.10(c)(1)(iii)(b)(1); N/A

(2) ___ corrosion-resistant coating - 373-3.10(c)(1)(iii)(b)(2); and N/A

(3) ___ electrical isolation devices - 373-3.10(c)(1)(iii)(b)(3); N/A

4. for underground tank system components that are likely to be affected by vehicle traffic, a determination of design or operational measure that will protect the tank system against potential damage - 373-3.10(c)(1)(iv); N/A

5. design considerations to ensure that - 373-3.10(c)(1)(v):

(a) ___ tank foundations will maintain the load of a full tank - 373-3.10(c)(1)(v)(a); N/A

(b) ___ tank systems will be anchored to prevent flotation or dislodgement where the tank system is placed in a saturated zone or within a seismic fault zone - 373.10(c)(1)(v)(b); and N/A

(c) ___ tank system will withstand the effects of frost heave - 373-3.10(c)(1)(v)(c); N/A

C. ___ The owner or operator of a new tank system ensured that proper handling procedures were followed to prevent damage to the system during installation. Prior to covering, enclosing or placing a new tank system or component in use the system must be inspected for the presence of the following: 373-3.10(c)(2) X

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

1. ___ weld breaks - 373-3.10(c)(2)(i); X
2. ___ punctures - 373-3.10(c)(2)(ii); X
3. ___ scrapes of protective coatings - 373-3.10(c)(2)(iii); X
4. ___ cracks - 373-3.10(c)(2)(iv); X
5. ___ corrosion - 373-3.10(c)(2)(v); and X
6. ___ other structural damage or inadequate construction or installation - 373.10(c)(2)(vi). X

D. ___ All discrepancies have been remedied before the tank system is covered, enclosed, or placed in use - 373-3.10(c)(2); X

E. ___ New tank systems or components and piping that are put underground and that are backfilled have been provided with a backfill material that is a non-corrosive, porous, homogeneous substance and that is carefully installed so that the backfill is placed completely around the tank and compacted to ensure that the tank and piping are fully and uniformly supported - 373-3.10(c)(3); N/A

F. ___ All new tanks and ancillary equipment have been tested for tightness prior to being covered, enclosed, or placed in use. If a tank system was found not to be tight, all repairs necessary to remedy the leaks in the system were performed prior to the tank system being covered, enclosed, or placed in use - 373-3.10(c)(4); X

G. ___ Ancillary equipment has been supported and protected against physical damage and excessive stress due to settlement, vibration, expansion or contraction - 373-3.10(c)(5); X

H. ___ The owner or operator has provided the type and degree of corrosion protection necessary, based on the information checked in items 5B3(a) through (b), to ensure the integrity of the tank system during use of the tank system. The installation of a corrosion protection system that is field fabricated must be supervised by an independent corrosion expert to ensure proper installation - 373-3.10(c)(6); N/A

I. ___ The owner or operator has obtained and kept on file at the facility written statements by those persons required to certify the design of the tank system and supervise the installation of the tank system in accordance with Items (C) through (H) above to attest that - 373-3.10(c)(7): X

1. ___ the tank system was properly designed and installed; and X

2. ___ any necessary repairs were performed; and X

J. ___ The written statements include the certification signed by the professional engineer as required by 373-1.4(a)(5)(iv) - 373-3.10(c)(1) & (7)/373-1.4(a)(5)(iv). [Complete Item 4B.) N/A

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

6. Secondary Containment Requirements - 373-3.10(d)

A. ___ Secondary containment systems must be designed, installed and operated to prevent any migration of wastes or accumulated liquids out of the system to the soil, groundwater or surface water at any time during the use of tank system - 373-3.10(d)(2)(i). X

B. ___ Secondary containment systems must be capable of detecting and collecting releases of accumulated liquids until the collected material is removed - 373-3.10(d)(2)(ii). X

C. At a minimum, the containment system is:

1. ___ constructed of or lined with materials that are compatible with the wastes to be placed in the tank system and must have sufficient strength and thickness to prevent failure due to pressure gradients (including static head and external hydrological forces), physical contact with the waste to which they are exposed, climatic conditions, the stress of installation, and the stress of daily operation (including stresses from nearby vehicular traffic) - 373-3.10(d)(3)(i); X

2. ___ placed on a foundation or base capable of providing support to the secondary containment system, providing resistance to pressure gradients above and below the system, and preventing failure due to settlement, compression, or uplift - 373-3.10(d)(3)(ii); X

3. ___ provided with a leak detection system that is designed and operated so that it will detect the failure of either the primary and secondary containment structure or any release of hazardous waste or accumulated liquid in the secondary containment system with 24 hours, or at the earliest practicable time if the existing detection technology or site conditions will not allow detection of a release within 24 hours - 373-3.10(d)(3)(iii); and X

4. ___ sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills, or precipitation. Spilled or leaked waste and accumulated precipitation must be removed from the secondary containment system within 24 hours, or in as timely a manner as is possible to prevent harm to human health or the environment, if removal of the released waste or accumulated precipitation cannot be accomplished within 24 hours - 373-3.10(d)(3)(iv). X

(Note: If the collected material is a hazardous waste under Part 371 of this title, it is subject to management as a hazardous waste in accordance with all applicable requirements of Parts 372 through 374 of this Title. If the collected material is discharged through a point source to waters of

the United States, it is subject to the requirements of Parts 700, 701, and 750 of this Title. If discharged to Publicly Owned Treatment Works (POTW's), it is subject to the requirements of Section 307 of the Clean Water Act, as amended. If the collected material is released to the environment, it may be subject to the reporting requirements of 40 CFR Part 302).

D. Secondary containment for tanks includes one or more of the following devices: 373-3.10(d)(4).

1. ___ a liner (external to the tank) [Complete Item E1]; N/A
2. ___ a vault [Complete Item E2]; X
3. ___ a double-walled tank [Complete Item E3]; or N/A
4. ___ an equivalent device as approved by the Commissioner. N/A

E. In addition to Items A through D above, secondary containment systems must meet the following requirements:

1. External liner systems must be - 373-3.10(d)(5)(i):

(a) ___ designed or operated to contain 100 percent of the capacity of the largest tank or the volume of all interconnected tanks, whichever is greater, within its boundary - 373-3.10(d)(5)(i)(a); N/A

(b) ___ designed or operated to prevent run-on or infiltration of precipitation into the secondary containment system unless the collection system has sufficient excess capacity to contain run-on or infiltration. Such additional capacity must be sufficient to contain precipitation from a 25-year, 24-hour rainfall event - 373-3.10(d)(5)(i)(b); N/A

(c) ___ free of cracks or gaps - 373-3.10(d)(5)(i)(c). N/A

(d) ___ designed and installed to completely surround the tank and to cover all surrounding earth likely to come into contact with the waste if released from the tanks (i.e. capable of preventing lateral as well as vertical migration of the waste. For onground tanks, the external liner system must also encompass the bottom of the tank) - 373-3.10(d)(5)(i)(d); N/A

(e) ___ external concrete liners must be constructed with chemical-resistant water stops in place at all joints (if any) - 373-3.10(d)(5)(i)(e); and N/A

(f) ___ external concrete liners must be provided with an impermeable interior coating that is compatible with the stored waste and that will prevent migration of waste into the concrete - 373-3.10(d)(5)(i)(f). N/A

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

2. Vault systems must be - 373-3.10(d)(5)(ii):

(a) ___ designed or operated to contain 100 percent of the capacity of the largest tank or the volume of all interconnected tanks, whichever is greater, within its boundary - 373-3.10(d)(5)(ii)(a); X

(b) ___ designed or operated to prevent run-on or infiltration or precipitation into the secondary containment system unless the collection system has sufficient capacity to contain run-on or infiltration. Such additional capacity must be sufficient to contain precipitation from a 25-year, 24-hour rainfall event - 373-3.10(d)(5)(ii)(b); X

(c) ___ constructed with chemical-resistant water stops in place at all joints (if any) - 373-3.10(d)(5)(ii)(c); X

(d) ___ provided with an impermeable interior coating or lining that is compatible with the stored waste and that will prevent migration of waste into the concrete - 373-3.10(d)(5)(ii)(d). X

(e) ___ provided with an exterior moisture barrier or be otherwise designed or operated to prevent migration of moisture into the vault, if the vault is subject to hydraulic pressure - 373-3.10(d)(5)(ii)(f); and X

(f) ___ provided with a means to protect against the formation of and ignition of vapors within the vault, if the waste being stored or treated - 373-3.10(d)(5)(ii)(e): X

(1) meets the definition of ignitable waste under section 371.3(b); or

(2) meets the definition of reactive waste under section 371.3(d) and may form an ignitable or explosive vapor.

3. Double-walled tanks must be - 373-3.10(d)(5)(iii):

(a) ___ designed as an integral structure (i.e., an inner tank within an outer shell) so that any release from the inner tank is contained by the outer shell - 373-3.10(d)(5)(iii)(a); N/A

(b) ___ protected, if constructed of metal, from both corrosion of the primary tank interior and the external surface of the outer shell - 373-3.10(d)(5)(iii)(b); and N/A

(c) ___ provided with a built-in, continuous leak detection system capable of detecting a release within 24 hours or at the earliest practicable time, if the owner or operator can demonstrate to the commissioner, and the commissioner concurs, that the existing leak detection technology or site conditions will not allow detection of a release within 24 hours - 373-3.10(d)(5)(iii)(c). N/A

F. Ancillary Equipment - 373-3.10(d)(6).

1. ___ Ancillary equipment must be provided with full secondary containment (e.g., trench, jacketing, double-walled piping) that meets the requirements of paragraphs (2) and (3) of this subdivision except for: 373-3.10(d)(6) X

(a) ___ aboveground piping (exclusive of flanges, joints, valves and connections) that are visually inspected for leaks on a daily basis; 373-3.10(d)(6)(i) X

(b) ___ welded flanges, welded joints, and welded connections that are visually inspected for leaks on a daily basis; 373-3.10(d)(6)(ii) N/A

(c) ___ sealless or magnetic coupling pumps and sealless valves that are visually inspected for leaks on a daily basis; and - 373-3.10(d)(6)(iii) N/A

(d) ___ pressurized aboveground piping systems with automatic shut-off devices (e.g., excess flow check valves, flow metering shutdown devices, loss of pressure actuated shut-off devices) that are visually inspected for leaks on a daily basis - 373-3.10(d)(6)(iv). N/A

7. Annual Leak Test or Tank Integrity Examination - 373-3.10(d)(9).

A. ___ For non-enterable underground tanks without secondary containment, a leak test that meets the requirements of 373-3.10(b)(2)(v) must be conducted at least annually [Complete Item 4.] - 373-3.10(d)(9)(i). N/A

B. ___ For other than non-enterable underground tanks and for all ancillary equipment without secondary containment, an annual leak test, as required in 373-3.10(b)(2)(v), or an internal inspection or other tank integrity examination by an independent, qualified, professional engineer registered in New York that addresses cracks, leaks, corrosion and erosion is conducted at least annually. The owner or operator must remove the stored waste from the tank, if necessary, to allow the condition of all internal tank surfaces to be assessed - 373-3.10(d)(9)(ii). N/A

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

C. ___ The owner or operator must maintain on file at the facility a record of the results of the assessments conducted in accordance with Items 7A and 7B above - 373-3.10(d)(9)(iii). N/A

D. ___ If a tank system or component is found to be leaking or unfit-for-use as a result of the leak test or assessment required in Item 7A or 7B above, the owner or operator must comply with the requirements of 373-3.10(g). [Complete Item 10.] - 373-3.10(d)(9)(iv). N/A

8. General Operating Requirements - 373-3.10(e)

A. ___ Hazardous wastes or treatment reagents must not be placed in a tank system if they could cause the tank, its ancillary equipment, or the secondary containment system to rupture, leak, corrode, or otherwise fail - 373-3.10(e)(1). X

B. ___ The owner or operator must use appropriate controls and practices to prevent spills and overflows from tank or secondary containment systems. These include at a minimum - 373-3.10(e)(2): X

1. ___ spill prevention controls (e.g., check valves, dry discount couplings) - 373-3.10(e)(2)(i); X

2. ___ overfill prevention controls (e.g., level sensing devices, high level alarms, automatic feed cutoff, or bypass to a standby tank) - 373-3.10(e)(2)(ii); and X

3. ___ maintenance of sufficient freeboard in uncovered tanks to prevent overtopping by wave or wind action or by precipitation - 373-3.10(e)(2)(iii). X

C. ___ The owner or operator must comply with the requirements of 373-3.10(g) if a leak or spill occurs in the tank system [Complete Item 10.] - 373-3.10(e)(3). N/A

D. ___ The owner or operator must mark all tanks with the words "Hazardous Waste" and with other words that identify the contents of the tanks. For underground tanks, the markings must be placed on a sign in the area above the tank - 373-3.10(e)(4). X

9. Inspections: - 373-3.10(f)

A. ___ The owner or operator must inspect, where present, at least once each operating day - 373-3.10(f)(1): X

1. ___ overfill/spill control equipment (e.g., waste-feed cutoff systems, bypass systems, and drainage systems) to ensure that it is in good working order - 373-3.10(f)(1)(i); X

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

2. ___ the above ground portions of the system, if any, to detect corrosion or releases of waste - 373-3.10(f)(1)(ii); X

3. ___ data gathered from monitoring equipment and leak-detection, equipment, (e.g., pressure and temperature gauges, monitoring wells) to ensure that the tank system is being operated according to its design - 373-3.10(f)(1)(iii); and X

4. ___ the construction materials and the area immediately surrounding the externally accessible portion of the tank system including secondary containment structures (e.g., dikes) to detect erosion or signs of releases of hazardous waste (e.g., wet spots, dead vegetation) - 373-3.10(f)(1)(iv). X

(Note: Section 373-2.2(g)(3) of this Subpart requires the owner or operator to remedy any deterioration or malfunction he finds. Subdivisions (g) of this section requires the owner or operator to notify the commissioner within 24 hours of confirming a release. Also, 40 CFR Part 302 may require the owner or operator to notify the National Response Center of a release.)

B. ___ The owner or operator must inspect cathodic protection systems, if present, according to, at a minimum, the following schedule to ensure that they are functioning properly - 373-3.10(f)(2): N/A

1. ___ the proper operation of the cathodic protection system must be confirmed within six months after initial installation, and annually thereafter - 373-3.10(f)(2)(i); and N/A

2. ___ all sources of impressed current must be inspected and/or tested, as appropriate, at least bimonthly (i.e. every other month) - 373-3.10(f)(2)(ii). N/A

C. ___ The owner or operator must document in the operating record of the facility the inspections required in Items 9A and 9B above - 373-3.10(f)(3). N/A

10. Response to leaks or spills and disposition of leaking or unfit-for-use tank systems - 373-3.10(g)

A. ___ A tank system or secondary containment system from which there has been a leak or spill, or which is unfit for use, has been removed from service immediately. X

B. ___ The owner or operator has satisfied the following requirements: X

1. ___ Cessation of use; prevent flow or addition of wastes. The owner or operator immediately stopped the flow of hazardous waste into the tank system or secondary X

containment system and inspected the system to determine the cause of the release - 373-3.10(g)(1);

2. ___ Removal of waste from tank system or secondary containment system - 373-3.10(g)(2): X

(a) ___ If the release was from the tank system, the owner or operator, within 24 hours after detection of the leak or, if the owner or operator demonstrated that this was not possible, at the earliest practicable time, removed as much of the waste as was necessary to prevent further release of hazardous waste to the environment and to allow inspection and repair of the tank system to be performed - 373-3.10(g)(2)(i). X

(b) ___ If the release was to a secondary containment system, all released materials must be removed within 24 hours, or in as timely a manner as is possible, to prevent harm to human health and the environment - 373-3.10(g)(2)(ii). X

3. ___ Containment of visible releases to the environment. The owner or operator immediately conducted a visual inspection of the release and, based upon that inspection - 373-3.10(g)(3): X

(a) ___ prevented further migration of the leak or spill to soils or surface water - 373-3.10(g)(3)(i); and X

(b) ___ removed, and properly disposed of, any visible contamination of the soil or surface water - 373-3.10(g)(3)(ii). N/A

4. ___ Notifications and reports - 373-3.10(g)(4). N/A

(a) ___ Any release to the environment, except as provided in (b) below, was reported to the Commissioner within 24 hours of detection - 373-3.10(g)(4)(i). N/A

(b) ___ A leak or spill of hazardous waste that is less than or equal to a quantity of one pound; and immediately contained and cleaned-up is exempted from these requirements - 373-3.10(g)(4)(ii). N/A

(c) ___ Within 30 days of detection of a release to the environment, a report containing the following information was submitted to the Commissioner - 373-3.10(g)(4)(iii): N/A

(1) ___ the likely route of migration of the releases; N/A

(2) ___ the characteristics of the surrounding soil (soil composition, geology, hydrogeology, climate); N/A

(3) ___ the results of any monitoring or sampling conducted in connection with the release, (if available). If sampling or monitoring data relating to the release are not available within 30 days, these data were submitted to the Commissioner as soon as they became available; N/A

(4) ___ the proximity to downgradient drinking water, surface water, and population areas; and N/A

(5) ___ a description of response actions taken or planned. N/A

5. ___ Provision of secondary containment, repair, or closure. Unless the owner or operator satisfies the requirements of Items (a) through (b) below, the tank system must be closed in accordance with 373-3.10(h). [Complete Items 11A through 11C.] - 373-3.10(g)(5)(i). N/A

(a) ___ If the cause of the release was a spill that has not damaged the integrity of the system, the owner or operator may return the system to service as soon as the released waste is removed and repairs, if necessary, are made - 373-3.10(g)(5)(ii); X

(b) ___ If the cause of the release was a leak from the primary tank system into the secondary containment system, the system must be repaired prior to returning the tank system to service - 373-3.10(g)(5)(iii); N/A

(c) ___ If the source of the release was a leak to the environment from a component of a tank system without secondary containment, the owner or operator must provide the component of the system from which the leak occurred with secondary containment that satisfies the requirements of 373-3.10(d) [Complete Items 6A through 6F] before it can be returned to service, unless the source of the leak is an aboveground portion of a tank system. If this source is an aboveground component that can be inspected visually, the component must be repaired and may be returned to service without secondary containment as long as the requirements of 373-3.10(g)(6) [Complete Item 10B6.] are satisfied. If a component is replaced, that component must satisfy the requirements for new tanks systems or components in accordance with 373-3.10(c) and (d). [Complete Items 5 and 6.] Additionally, if a leak has occurred in any portion of a tank system component that is not readily accessible for visual inspection (e.g. the bottom of an inground or onground tank), the entire component must be provided with secondary containment in accordance with 373-3.10(d) [Complete Items 6A through 6F.] prior to being returned to use - 373-3.10(g)(5)(iv). N/A

6. ___ Certification of major repairs. If the owner or operator has repaired a tank system in accordance with 373-3.10(g)(5) [See Item 10B5 above], and the repair has been extensive (e.g. installation of an internal liner; repair of a ruptured primary containment or secondary containment vessel), the tank system must not be returned to service unless the owner or operator has obtained a certification, in accordance with 373-1.4(a)(5)(iv), by an independent, qualified, professional engineer registered in New York that the repaired system is capable of handling hazardous wastes without release for the expected life of the system. This certification must be submitted to the Commissioner within seven days after returning the tank system to use [Complete Item 4B.] - 373-3.10(g)(6). N/A

11. Closure and Post-Closure Care: - 373-3.10(h)

A. ___ At closure of a tank system, the owner or operator must remove or decontaminate all waste residues, contaminated containment system components (liners, etc.) contaminated soils, and structures and equipment contaminated with waste, and manage them as hazardous waste, unless they are not hazardous waste under 371.1(d)(4) - 373-3.10(h)(1). N/A

B. ___ If the owner or operator demonstrates that not all contaminated soils can be practicably removed or decontaminated as required in paragraph 373-3.10(h)(1) [See Item 11A above], then the owner or operator must close the tank system and perform post-closure care in accordance with the closure and post-closure care requirements that apply to landfills [section 373-3.14(d)]. In addition, for the purposes of closure, post-closure, and financial responsibility, such a tank system is then considered to be a landfill, and the owner or operator must meet all of the requirements for landfills specified in sections 373-3.7 and 3.8. - 373-3.10(h)(2). N/A

C. ___ If an owner or operator has a tank system which does not have secondary containment that meets the requirements of 373-3.10(d)(1) through (d)(6) [See Items 6A through 6F] and which is not exempt from the secondary containment requirements through a variance granted in accordance with 373-3.10(d)(7), then - 373-3.10(h)(3): N/A

1. ___ The closure plan for the tank system must include both a plan for complying with 373-3.10(h)(1) [See Item 11A.] and a contingency plan for complying with 373-3.10(h)(2) [See Item 11B - 373-3.10(h)(3)(i). N/A

2. ___ A contingent post-closure plan for complying with 373-3.10(h)(2) [See Item 11B] must be prepared and submitted as part of the permit application - 373-3.10(h)(3)(ii). N/A

3. ___ The cost estimates calculated for closure and post-closure care must reflect the costs of complying with the contingent closure plan and the contingent post-closure plan, if these costs are greater than the costs of complying with the closure plan prepared for the expected closure under 373-3.10(h)(1) [See Item 11A.] - 373-3.10(h)(3)(iii). N/A

4. ___ Financial assurance must be based on the cost estimates provided in 373-3.10(h)(3)(iii) [See Item 11C3 above.] - 373-3.10(h)(3)(iv). N/A

5. ___ For the purposes of the contingent closure and post-closure plans, such a tank system is considered to be a landfill, and the contingent plans must meet all of the closure, post-closure, and financial responsibility requirements for landfills under sections 373-3.7 and 3.8 of this Subpart - 373-3.10(h)(3)(v). N/A

12. Ignitable or Reactive Waste - 373-3.10(i)

A. ___ Ignitable or reactive waste is not placed in a tank unless: X

1. ___ the waste is treated, rendered or mixed before or immediately after placement in the tank system so that the resulting waste, mixture or dissolved of material is no longer ignitable or reactive, and - 373-3.10(i)(1)(i)(a); N/A

2. ___ the treatment, storage, or disposal of ignitable or reactive or reactive waste, and the mixture or commingling of incompatible wastes and materials, is conducted so that it does not - 373-3.10(i)(1)(i)(b)/ 373-3.2(h)(2): X

(a) ___ generate extreme heat or pressure, fire or explosions, or violent reactions; X

(b) ___ produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health; X

(c) ___ produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions; X

(d) ___ damage the structural integrity of the device or facility containing the waste; or X

(e) ___ through other like means threaten human health or the environment; X

3. ___ the waste is stored or treated in such a way that it is protected from any material or conditions that may cause the waste to ignite or react - 373-3.10(i)(1)(ii); or X

4. ___ the tank system is used solely for emergencies - 373-3.10(1)(1)(iii). N/A

B. ___ The owner or operator of a facility where ignitable or reactive waste is stored or treated in tanks must comply with the National Fire Protection Association's requirements for the maintenance of protective distances between the waste management area and any public ways, streets, alleys, or an adjoining property line that can be built upon. - 373-3.10(i)(2). X

13. Special Requirements for Incompatible Wastes - 373-3.10(j)

A. ___ Incompatible wastes, or incompatible waste and materials, must not be placed in the same tank system, unless 373-3.2(h) [Complete Item 12A.2.] is complied with - 373-3.10(j)(1). X

B. ___ Hazardous waste must not be placed in a tank system that has not been decontaminated and that previously held an incompatible waste or material, unless 373-3.2(h)(2) [Complete Item 12A.2.] is complied with - 373-3.10(j)(2). X

14. Waste Analysis and Trial Tests - 373-3.10(k)

A. ___ Waste analysis and trial tests. In addition to performing the waste analysis required in 373-3.2(d), the owner or operator must, whenever a tank system is to be used to treat chemically or to store a hazardous waste that is substantially different from waste previously treated or stored in that tank system; or treat chemically a hazardous waste with a substantially different process than previously used in that tank system: N/A

1. ___ conduct waste analyses and trial treatment or storage tests (e.g., bench-scale or pilot-plant scale tests) - 373-3.10(k)(1); or N/A

2. ___ obtain written, documented information on similar waste under similar operating conditions to show that the proposed treatment or storage will meet the requirements of 373-3.10(e)(1) [Complete Items 8A.] - 373-3.10(k)(2). N/A

Company Name DELPHI ENERGY & ENGINE MANAGEMENT SYSTEMS

EPA ID# No. N Y D 0 0 2 2 1 5 2 3 4

Region/Inspector 8/CLIFFORD D. RICHMOND

Inspection Date 10-31-95

APPENDIX F

Elementary Neutralization Units or Wastewater Treatment Units

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

1. ___ Elementary neutralization units or wastewater treatment units as defined must meet the following requirements - 373-1.1(d)(1)(xii): X

   A. ___ Personnel training - 373-3.2(g) [Complete Part V, Item 6 (pgs. V-7 and V-8)]. X

   B. ___ Preparedness and Prevention - 373-3.3 [Complete Part V, Item 7 (pgs. V-8 through V-10)]. X

   C. ___ Contingency Plan - 373-3.4 [Complete Part V, Items 8 and 9 (pgs. V-10 through V-12)]. X

   D. ___ Containers are managed in accordance with section 373-3.9 [Complete Items 3A-G (pgs. F-2 thru 3)]. N/A

   E. ___ Tanks are managed in accordance with 373-3.10(k). [Complete Items 2A (pgs. F-1 and F-2)]. X

   F. X All areas, containers and tanks used to treat hazardous waste are marked with the words "Hazardous Waste" and other words that identify the contents. ___

   G. ___ For batch treatment and equalization units, the date on which each period of accumulation begins is clearly marked and visible for inspection. N/A

2. Waste Analysis and Trial Tests - 373-3.10(k)/373-1.1(d)(1)(xii)(b)

   A. ___ Waste analysis and trial tests. In addition to performing the waste analysis required by section 373-3.2(d), the owner or operator has, whenever a tank system is to be used to treat chemically or to store a hazardous waste that is substantially different from waste previously treated or stored in that tank system; or treat chemically a hazardous waste with a N/A

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

substantially different process than previously used in that tank system: [Complete Part VI, Item 2 (pgs VI-1 through VI-3)].

1. ___ conducted waste analyses and trial treatment or storage tests (e.g., bench-scale or pilot-plant scale tests) - 373-3.10(k)(1); or — N/A

2. ___ obtained written, documented information on similar waste under similar operating conditions to show that the proposed treatment or storage will not cause the tank or its ancillary equipment to rupture, leak, corrode or otherwise fail - 373-3.10(k)(2). — N/A

3. Container Requirements - 373-3.9 [Only for containers used in neutralization].

A. ___ The containers appear to be in good condition and are not in danger of leaking. (If containers are leaking, describe the type, condition and number that are leaking or corroded. Be detailed and specific) - 373-3.9(b). — N/A

_____

_____

_____

B. ___ Hazardous waste is stored in containers made of compatible materials. (If not, please explain) - 373-3.9(c). — N/A

_____

_____

_____

C. ___ All containers except those in use are closed - 373-3.9(d)(1). — N/A

D. ___ Containers holding hazardous waste must not be opened, handled or stored in a manner which may rupture the container or cause it to leak - 373-3.9(d)(2). — N/A

E. ___ Containers holding hazardous waste must be marked with the words "Hazardous Waste" and other words identifying their contents - 373-3.9(d)(3). — N/A

F. ___ The storage area is inspected at least weekly - 373-3.9(e). — X

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

G. ___ The generator complies with the following special requirements related to incompatible wastes - 373-3.9(g): N/A

1. ___ The mixture or commingling of incompatible wastes, or incompatible wastes and materials, in the same container is conducted to prevent - 373-3.2(h)(2): N/A

(a) ___ the generation of extreme heat or pressure, fire or explosion, or violent reaction - 373-3.2(h)(2)(i). N/A

(b) ___ the production of uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health - 373-3.2(h)(2)(ii); N/A

(c) ___ the production of uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions - 373-3.2(h)(2)(iii); N/A

(d) ___ damage to the structural integrity of the device or facility containing the waste - 373-3.2(h)(2)(iv); or N/A

(e) ___ a threat to human health or the environment - 373-3.2(h)(2)(v). N/A

2. ___ Incompatible wastes, or incompatible wastes and materials, are not placed in the same container - 373-3.9(g)(1). N/A

3. ___ Hazardous waste is not placed in an unwashed container that previously held an incompatible waste or material - 373-3.9(g)(2). N/A

4. ___ A hazardous waste storage container that is incompatible with any waste or other material is separated from those materials by a dike, berm, wall or other device - 373-3.9(g)(3). N/A

Attachment A

IV. Description of the Source of Generation and Waste Management Method for Each Waste Stream > 5 Tons in 1994

A. Waste Petroleum Distillate: (D001)

Waste Petroleum Distillate (WPD) is produced by two processes. The first process is the flow testing of fuel systems manufactured at this facility. The second source is non-productive parts degreasing. Both of the waste streams are combined, collected, and shipped offsite to be used as an energy source in a fuels program.

B. Plating Sludge: (D007)

When the parts plating equipment is maintained or removed from service, the sludge and parts that accumulate in the bottom of the tanks are shoveled out into drums for disposal.

E. Chromium Bearing Waste Water: (D007)

Various parts manufactured at the facility require corrosion protection. This protection is provided by dichromating the parts followed by a rinse process. This chromium bearing rinse water is segregated treated in our waste water plant, and discharged to the POTW.

G. Waste Water Treatment Sludge: (D007)

The chromium bearing waste water is treated to remove heavy metals and the sludge removed is TCLP hazardous.

The following waste streams were reported in the 1990 HWRP. They were less than 5 tons in 1994 and therefore not addressed in this HWRPBU.

C. Cyanide Waste (F011)(D003)

D. Waste Oil With Solvent (D001)

F. Adsorbents With Petroleum Distillates (D001)

V. Block Diagram Flowsheets of Processes Generating Waste

The following flow diagrams graphically depict the narrative summary of each waste stream described in Section IV.

#8

Category Modification

New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233

Thomas C. Jorling
Commissioner

July 24, 1990

Mr. Dennis Grady
General Motors Corporation
Rochester Products Division
1000 Lexington Avenue
Rochester, New York 14692

Dear Mr. Grady:

RE: Closure of General Motors - Rochester Products Division

EPA Identification Number: NYD002215234

This letter is to confirm the receipt of owner/operator and independent professional engineer's certification dated January 18, 1990, of RCRA closure for this facility. We now consider this facility officially closed. Your authority to operate as a Treatment, Storage, and Disposal Facility (TSDF) is terminated.

Please be advised that the United States Environmental Protection Agency has determined that the corrective action provisions of the Hazardous and Solid Waste Amendments (HSWA), Section 3008(h), apply to all TSDF's which have acquired interim status.

The New York State Department of Environmental Conservation has established a program to evaluate the corrective action measures necessary at closed and closing facilities within the State. Once the corrective action provisions of HSWA have been met by the facility or determined not to be necessary at the facility, the facility can have their interim status terminated.

If you have any questions regarding your closure or regulatory status, please contact Gary Belcher at (518) 457-9361.

Sincerely,

Salvatore Carlomagno

Salvatore J. Carlomagno, P.E.
Chief, Regional Permit Section
Bureau of Haz. Waste Facility Compliance
Division of Haz. Substances Regulation

cc: J. Gorman
J. Desai
D. Rollins - Region 8

SJC:scy

STATE OF ARKANSAS
Department of Pollution Control and Ecology
P. O. Box 8913 Little Rock, Arkansas 72219-8913
Telephone 501-562-7444

ITEM #3

1

Please print or type. *(Form designed for use on elite (12-pitch) typewriter.)*

Form Approved. OMB No. 2050-0039. EXPIRES 9-30-96

AR-2-95

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. N Y D 0 0 2 2 1 5 2 3 4 — Manifest Document No. 09280

2. Page 1 of 2 — Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Delphi Automotive Systems -DLV. GMC
1000 Lexington Avenue
Rochester, NY 14606-

4. Generator's Phone (716) 647-7000

A. State Manifest Document Number: AR- 789856

B. State Generator's ID: SAME

5. Transporter 1 Company Name: Dart Trucking Company, Inc.

6. US EPA ID Number: D H D 0 0 9 8 6 5 8 2 5

C. State Transporter's ID: PC 0902 H 205

D. Transporter's Phone: 508/987-7313

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID: PC ____ H ____

F. Transporter's Phone

9. Designated Facility Name and Site Address
ENSCO, Inc.
American Oil Road
El Dorado, AR 71730-

10. US EPA ID Number: A R D 0 6 9 7 4 8 1 9 2

G. State Facility's ID: SAME

H. Facility's Phone: (501) 863-7173

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ, WASTE FLAMMABLE SOLIDS, N.O.S., Contains(Stoddard Solvent, Mineral Spirits), 4.1, UN1325, PG III, (D001), (ERG#32)	001	DM	00208	P	D001
b. RQ, WASTE FLAMMABLE SOLIDS, N.O.S., Contains(Stoddard Solvent, Mineral Spirits), 4.1, UN1325, PG III, (D001), (ERG#32)	001	DM	00672	P	D001
c. RQ, HAZARDOUS WASTE, SOLID, N.O.S., Contains(Nickel Cadmium Batteries), 9, NA3077, PG III, (D006), (ERG#31)	002	DF	00070	P	D006
d. RQ, HAZARDOUS WASTE, SOLID, N.O.S., Contains(Trichloroethene, 1,1,1-Trichloroethane), 9, NA3077, PG III, (F001), (ERG#31)	002	DM	00481	P	F001

J. Additional Descriptions for Materials Listed Above
(a) WMDS #3225
(b) WMDS #52000
(c) WMDS #605648
(d) WMDS #605422

If no alternate TSDF, return to generator

K. Handling Codes for Wastes Listed Above
EMERGENCY RESPONSE INFORMATION:
Phone: (716) 647-7000
Contact: Plant Security
(a) B (b) B (c) R (d) B

15. Special Handling Instructions and Additional Information
Load # PO #

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 Arkansas state regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volumn 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.

GENERATOR

Printed/Typed Name: RICHARD T. ZWOLAK — Signature: R T Zwolak — Month Day Year: 1 1 13 95

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: PAUL G. LAPLANTE — Signature: Paul G. LaPlante — Month Day Year: 1 1 13 95

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

FACILITY

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 — Month Day Year

EPA Form 8700-22 (Rev. 9-88) Previous edition is obsolete.

NOTICE: THE ORIGINAL AND NOT LESS THAN TWO (2) COPIES MUST MOVE WITH THE HAZARDOUS WASTE SHIPMENT. ONCE DELIVERED, THE TREATMENT/STORAGE/DISPOSAL FACILITY MUST RETURN THIS ORIGINAL COPY TO THE GENERATOR.

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-96

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)

21. Generator's US EPA ID No. NYD002215234	Manifest Document No.	22. Page 2 of 2	Information in the shaded areas is not required by Federal law.

23. Generator's Name
Delphi Automotive Systems – DIV GMC
1000 Lexington Avenue
Rochester, NY 14606- 716 647-7000

L. State Manifest Document Number [illegible]
M. State Generator's ID SAME

24. Transporter ___ Company Name | 25. US EPA ID Number
N. State Transporter's ID
O. Transporter's Phone

26. Transporter ___ Company Name | 27. US EPA ID Number
P. State Transporter's ID
Q. Transporter's Phone

28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM	29. Containers No.	Type	30. Total Quantity	31. Unit Wt/Vol	R. Waste No.
a. RQ, WASTE LITHIUM BATTERIES, CONTAINED IN, EQUIPMENT, 9, UN3091, PG II, (D003), (ERG#40)		001	DM	0160	P	D003
b. RQ, WASTE PAINT, 3, UN1263, PG II, (D001), (ERG#27)		002	DM	1202	P	D001
c.						
d.						
e.						
f.						
g.						
h.						
i.						

S. Additional Descriptions for Materials Listed Above
(a) WMDS #623975
(b) WMDS #59549

T. Handling Codes for Wastes Listed Above
(a) B
(b) B

32. Special Handling Instructions and Additional Information
Load # PO #

33. Transporter ___ Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date Month	Day	Year

34. Transporter ___ Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date Month	Day	Year

35. Discrepancy Indication Space

GENERATOR / TRANSPORTER / FACILITY

ITEM 54

DELPHI
Energy & Engine Management Systems

Delphi Automotive - E
Division of General Motors
1000 Lexington Avenue
Rochester, NY 14606

November 20, 1995

Mr. Dixon Rollins
New York State Dept. of Environmental Conservation
6274 East Avon - Lima Road
Avon, New York 14414

Dear Mr Rollins:

I am requesting a 90 day extension on the 90 day accumulation time for one five (5) gallon pail of soil and floor sweepings that are contaminated with 1 - 2% of free mercury. This waste is a D009 / U151 EPA Waste code.

Disposal will be through our GM corporate disposal contract with Laidlaw / USPCI with this waste ultimately going to Bethlehem Apparatus for mercury recovery.

This waste was stored in a pail overpacked in a 55 gallon drum in what we considered to be our accumulation storage area. During the recent NYSDEC multimedia inspection, we were instructed to consider that area as a storage area.

Due to this change in our plans and the restrictions placed on this facility by corporate GM, it will be at least until January 15th before all the proper paperwork is in place to ship this material.

Please contact me at (716) 647-7000 if you have any questions on this matter.

Thank you for your assistance.

Sincerely,

Rich Zwolak - Supervisor of Waste Treatment

Rich Zwolak

RTZ951120

PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES
Bureau of Waste Management
P.O. Box 8550
Harrisburg, PA 17105-8550

ITEM # 4

ER-WM-51 REV. 10/94

OFFICIAL PENNSYLVANIA MANIFEST FORM

Form approved. OMB No. 2050-0039 Expires 9-30-96

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. NYD 002 215 234 | Manifest Document No. 09284

2. Page 1 of 1 | Information within the blue border is not required by Federal law but may be required by State law.

3. Generator's Name and Mailing Address
General Motors - Delphi Automotive
1000 Lexington Ave.
Rochester, NY 14606

A. State Manifest Document Number PAE 4786854

B. State Gen. ID SAME

5. Transporter 1 Company Name: Laidlaw Env. Svcs. (NE), Inc. | 6. US EPA ID Number: MAD 000 604 447

C. State Trans. ID: PA-AH 13908 MM

7. Transporter 2 Company Name: Franklin Environmental Services | 8. US EPA ID Number: MAD 084814136

D. Transporter's Phone (508) 683-1002

9. Designated Facility Name and Site Address
Bethlehem Apparatus Company, Inc.
890 Front Street
Hellertown, PA 18055 | 10. US EPA ID Number: PAD 002 390 961

E. State Trans. ID: PA-AH

F. Transporter's Phone (800 426-9878

G. State Facility's ID

H. Facility's Phone (610) 838-7034

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ, Hazardous Waste Solid, n.o.s. (Soil Containing Free Mercury) 9 NA3077 PG III (D009) ERG-#60	001	DM	0043	P	D009
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above

a. Lab Pack [ ] Physical State [ ] Profile #S1437
b. Lab Pack [ ] Physical State [ ]
c. Lab Pack [ ] Physical State [ ]
d. Lab Pack [ ] Physical State [ ]

K. Handling Codes for Wastes Listed Above

a. NY=B
b.
c.
d.

15. Special Handling Instructions and Additional Information

This waste is a characteristic hazardous waste and is designated for use, reuse, recycle or reclaim

AUTHORIZATION #A6363 PO #79593

Emergency Contact (Laidlaw) 1-508-683-1002 DELPHI (716) 647-7000

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. 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: RICHARD T. ZWOLAK | Signature: R T Zwolak | Month/Day/Year: 12/18/95

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: Michael P. Allen | Signature: Michael P. Allen | Month/Day/Year: 12/18/95

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Month/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 | Month/Day/Year

Form 8700-22 (Rev. 9/88) Previous editions are obsolete

GENERATOR

PAE 4786854

3

Copy 3 - Generator: Mail to Destination State

ITEM #6

MATERIAL SAFETY DATA SHEET

SECTION I

PRODUCT NAME OR NUMBER(AS IT APPEARS ON LABEL) SURCOOL 400R	GM COMMON CODE
MANUFACTURER'S NAME SURBOND LUBRICANTS INC.	EMERGENCY TEL.NO. 1-800-387-7970
ADDRESS 1 MILL ST. , P.O. BOX 346 BATAVIA, NY 14020	MANFACTURERS DUNS # 11-832-3112
HAZARDOUS MATERIAL DESCRIPTION, PROPER SHIPPING NAME, HAZARD CLASS PETROLEUM OIL, NOIBN	
ADDITIONAL HAZARD CLASSES N/A	
CHEMICAL FAMILY N/A	FORMULA MIXTURE

SECTION II — INGREDIENTS
(LIST ALL INGREDIENTS)

CAS REG.#	% WT.	CHEMICAL NAME(S)	LISTED AS CARCINOGENIC IN NTP, IARC OR OSH. 1910z
64742-52-5	13-18	SEVERELY HYDROTREATED PETROLEUM OIL	NO
68586-07-2 5419-55-6 68003-13-4 110-97-4 11113-50-1	15-30	BORIC ACID ALKANOLAMINE SALTS	NO
68440-40-4 68440-29-9	5-10	MODIFIED FATTY ESTERS (CHLORINATED)	NO
102-71-6 7722-71-6	1-3	TRIETHANOLAMINE FATTY PHOSPHATE ESTER MIXTURE	NO
68608-26-4	1-10	SODIUM PETROLEUM SULFONATE	NO
66071-98-5 68648-22-6	5-7	ALKANOLAMIDE SOAP MIXTURE	NO
67701-01-3 66455-31-0 102-71-6	1-3	POLYOL FATTY ESTER MIXTURE	NO
20324-33-8	2-4	TRIPROPYLENE GLYCOL METHYL ETHER	NO
9002-92-0	1-3	ETHOXYLATED LINEAR ALCOHOL	NO
3811-73-2	<0.5	SODIUM OMADINE	NO
3492-26-4	<0.5	SODIUM MERCAPTOBENZOTHIAZOLE	NO
64-02-8	<0.5	TETRASODIUM EDTA	
95-14-7	<1%	BENZOTRIAZOLE	NO
4719-04-4	1-3%	HEXAHYDRO-1,3,5,-TRIS(2-HYDROXYETYHL)-S-TRIAZINE	NO
mixture	<1%	ANTIFOAM - GM FID# 208318	NO
7732-18-5	balance	WATER	NO

* INDICATES INGREDIENTS REPORTABLE UNDER SARA TITLE III

Material Safety Data Sheet

SUPERKOOL 35

HMIS HAZARD RATING
1 HMIS HEALTH
1 HMIS FLAMMABILITY
0 HMIS REACTIVITY

Section I - Material Identification and Use

ANUFACTURER'S NAME..... D.A. STUART INC.
ANUFACTURER'S ADDRESS..... 43 UPTON ROAD, SCARBOROUGH, ONTARIO M1L 2C1
MERGENCY PHONE NUMBER..... 613-996-6666
UPPLIER NAME..... D.A. STUART COMPANY
UPPLIER'S ADDRESS..... P.O. Box 346-1 Mill St.-Batavia NY 14020
UPPLIER EMERGENCY PHONE NUMBER. As manufacturer
RODUCT NAME..... SUPERKOOL 35
RODUCT USE..... Cutting oil

Section II - Hazardous Ingredients/Identity Information

AZARDOUS INGREDIENTS	HAZARDOUS INGREDIENT PERCENT	ACGIH TLV	CAS#
everely hydrotreated etroleum oil	50-60	5 mg/m^3	64742-52-5
olvent refined petroleum .1	20-30	5 mg/m^3	64742-65-0
ilorinated paraffin C_{14}-C_{17} 51% ilorine)	5-10	not established	63449-39-8
oya fatty acids	1-10	not established	68308-53-2
imethylolpropane	< 1	not established	77-99-6
ilfurized additive	1-10	not established	68425-16-1
ickifier	< 0.5	not established	9003-27-4
itioxidant	< 0.1	not established	118-82-1

Material Safety Data Sheet

SUPERKOOL 35

INGREDIENTS MARKED WITH A (**) ARE SUBJECT TO THE REPORTING REQUIREMENTS OF SECTION 313 OF THE EMERGENCY PLANNING AND COMMUNITY RIGHT TO KNOW ACT OF 1986 AND OF CFR 372

CONTAINS COMPONENTS LISTED WITH TSCA

Section III - Physical Data For Product

SICAL STATE.....	Liquid
R AND APPEARANCE.....	Clear amber, mild odor
CIFIC GRAVITY.....	0.94
OR PRESSURE.....	mm Hg @20°C: nav
OR DENSITY (air=1).....	>1
PORATION RATE.....	Slower than n. Butyl Acetate
LING POINT.....	n.av
EZING POINT.....	n.av
.....	n.ap
SITY (g/ml).....	0.94
UBILITY IN WATER.....	negligible

Section IV - Fire and Explosion Hazard of Product

DITIONS OF FLAMMABILITY.....	n.ap.
INGUISHING MEDIA.....	In case of fire, use water spray, foam, dry chemical, or CO_2.
SHPOINT AND METHOD.....	> 300° F COC
ER EXPLOSION LIMIT(% BY VOL).	n.ap.
ER EXPLOSION LIMIT(% BY VOL).	n.ap.
O-IGNITION TEMPERATURE.....	n.ap.
MMABILITY CLASSIFICATION.....	Not classified as a flammable substance under DOT.
ARDOUS COMBUSTION PRODUCTS...	If oxides of carbon, sulphur, chlorine and nitrogen
CIAL FIREFIGHTING PROCEDURES.	Clear fire area of unprotected personnel. Do not enter confined space without proper protective equipment.
SUAL FIRE OR EXPLOSION ARDS.....	n.ap.

Section V - Reactivity Data

MICAL STABILITY.....	Stable
OMPATIBLE MATERIALS.....	Strong oxidizing agents and acids.
DITIONS OF REACTIVITY.....	Prolonged contact with the above
ARDOUS DECOMPOSITION PRODUCTS	None known

Section VI - Health Hazard Data

ROUTES OF ENTRY	
SKIN CONTACT	Yes
SKIN ABSORPTION	Not expected
EYE	Yes
INHALATION	Yes
INGESTION	Yes
ACUTE OVER EXPOSURE EFFECTS	Will cause moderate eye irritation Prolonged or repeated exposure to the concentrate may cause skin irritation. If ingested in large amounts will cause indigestion and nausea. Inhalation of oil mist or vapours from hot oil may cause irritation of the upper respiratory tract
CHRONIC OVER EXPOSURE EFFECTS	None known
EXPOSURE LIMITS	Oil Mist: 5mg/m^3
IRRITANCY OF PRODUCT	Not known to be an irritant.
SENSITIZATION TO MATERIAL	Not known to be a sensitizer in normal industrial use
CARCINOGENICITY, REPRODUCTIVE EFFECTS	None known
TERATOGENICITY, MUTAGENICITY	None known
TOXICOLOGICALLY SYNERGISTIC PRODUCTS	None known

Section VII - Precautions for Safe Handling and Use

PERSONAL PROTECTIVE EQUIPMENT	Chemical goggles Impervious gloves Breathing apparatus if exposure limits are exceeded Eye wash station nearby
SPECIFIC ENGINEERING CONTROLS	Sufficient to keep below exposure limits
LEAK AND SPILL PROCEDURES	Contain spill by dyking and/or use an inert absorbent (e.g., sand, clay). Wash area with detergent/water.
WASTE DISPOSAL	Follow local and federal government regulations
HANDLING PROCEDURES AND EQUIPMENT	Use good hygiene procedures. Do not pressurize containers. Do not cut or weld containers. Do not reuse containers.
STORAGE REQUIREMENTS	Keep containers closed in a cool, dry place.
OTHERS	n.ap

Material Safety Data Sheet

SUPERKOOL 35

Section VIII - First Aid Measures

IFIC FIRST AID PROCEDURES... Eyes: Rinse with water for at least 15 minutes. Seek medical attention if irritation persists.

Ingestion: DO NOT INDUCE VOMITING. Give water or milk to drink. Seek medical assistance.

NB: never give anything by mouth to an unconscious person.

Skin: Wash thoroughly in flowing water while removing contaminated clothing.

Section IX - Special Information

RD CLASS..... n.ap.
SHIPPING NAME..... n.ap
UMBER..... n.ap.
..... n.ap.

Preparation Date of Material Safety Data Sheet

ARED BY..... Research and Development Department
E NUMBER OF PREPARER..... (416) 757-3226
PREPARED..... July 10, 1995

information contained herein is offered only as a guide to the handling of specific material and has been prepared in good faith by technically ledgeable personnel. It is not intended to be all-inclusive and the manner conditions of use and handling may involve other and additional iderations. No warranty of any kind is given or implied and D.A. STUART not be liable for any damages, losses, injuries or consequential damages h may result from the use or reliance on any information contained herein.

MATERIAL SAFETY DATA SHEET

SECTION I

PRODUCT NAME OR NUMBER (AS IT APPEARS ON LABEL) DRAWSOL NPD 556	GM COMMON CODE
MANUFACTURER'S NAME D.A STUART COMPANY	EMERGENCY TEL.NO. 416-757-3226
ADDRESS 1 MILL ST. , P.O. BOX 346 BATAVIA, NY 14020	MANFACTURERS DUNS # 11-832-3112
HAZARDOUS MATERIAL DESCRIPTION, PROPER SHIPPING NAME, HAZARD CLASS N/A	
ADDITIONAL HAZARD CLASSES N/A	
CHEMICAL FAMILY N/A	FORMULA MIXTURE

SECTION II - INGREDIENTS
(LIST ALL INGREDIENTS)

CAS REG.#	% WT.	CHEMICAL NAME(S)	LISTED AS CARCINOGENIC IN NTP, IARC OR OSHA 1910z
64742-52-5	40-50	Hydrotreated petroleum oil	NO
68334-13-4	20-30	Alkyl ester of Fatty acid	NO
6[illegible]49-39-8	20-30	Chlorinated paraffin (does not contain C_{12} 60% material)	NO
72102-30-8	< 2	Sulfurized Fatty acid ester	NO
61789-86-4	1-5	Calcium petroleum sulfonate	NO

INDICATES INGREDIENTS REPORTABLE UNDER SARA TITLE III

SECTION III - PHYSICAL DATA

BOILING POINT (°C)	>250	SPECIFIC GRAVITY (WATER = 1)	0.99
VAPOR PRESSURE @ 20°C	<1	PERCENT VOLATILE BY VOLUME	NIL
VAPOR DENSITY (AIR=1)	>1	EVAPORATION RATE slower than butyl acetate	
SOLUBILITY IN WATER	Nil	pH =	N/A
PERCENT SOLID BY WEIGHT	Nil		

APPEARANCE AND ODOR
Clear, light brown - mild odor

IS MATERIAL: (LIQUID) SOLID
GAS PASTE POWDER

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT >302°F >150°C METHOD USED: COC FLAMMABLE LIMITS LEL NAV UEL NAV

EXTINGUISHING MEDIA: Water fog or mist, foam, dry chemical, CO_2

SPECIAL FIRE FIGHTING PROCEDURES: Treat as oil fire, keep cool, do not use water on burning liquid

UNUSUAL FIRE AND EXPLOSION HAZARDS: None known

SECTION V - HEALTH HAZARD DATA

EFFECTS OF OVEREXPOSURE - CONDITONS TO AVOID
May irritate eyes upon contact. Prolonged exposure to high levels of mist or smoke may cause irritation

THRESHOLD LIMIT VALUE 5 mg/m3 - oil mist

PERMISSIBLE EXPOSURE LIMIT _____

PRIMARY ROUTES OF ENTRY: INHALATION X SKIN CONTACT X OTHER SPECIFY _____

EMERGENCY AND FIRST AID PROCEDURES: Skin - wash with soap & water. Eyes rinse with water for at least 15 min. Inhalation - remove to fresh air.

SECTION VI - REACTIVITY DATA

STABILITY	UNSTABLE ___ CONDITIONS TO AVOID STABLE X
INCOMPATIBILITY (MATERIALS TO AVOID)	Acids, strong oxidizing agents
HAZARDOUS DECOMPOSITION PRODUCTS:	Incineration: oxides of carbon, sulfur and HCl
HAZARDOUS POLYMERIZATION	MAY OCCUR ___ CONDITIONS TO AVOID WILL NOT OCCUR X

SECTION VII - SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIALIS RELEASED OR SPILLED: Contain spill by diking and/or use absorbent
WASTE DISPOSAL METHOD: Dispose according to local & federal regulations
CERCLA (SUPERFUND) REPORTABLE QUANTITY (IN LBS): NAP
RCRA HAZARDOUS WASTE NO. (40 CFR 251.33): NAP
VOLATILE ORGANIC COMPOUND (VOC) (AS PACKAGED, MINUS WATER): Nil
___ THEORETICAL _____ LB/GAL ___ ANALYTICAL _____ LB/GAL

SECTION - VIII - SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION (SPECIFY TYPE): Filter for Organic mist or vapor only if above TLV.
VENTILATION LOCAL EXHAUST (SPECIFY RATE): As needed to control TLV SPECIAL MECHANICAL (GENERAL) (SPECIFY RATE) OTHER.
PROTECTIVE GLOVES: (SPECIFY TYPE) Neoprene or nitrile if needed EYE PROTECTION: (SPECIFY TYPE) Safety glasses or goggles
OTHER PROTECTIVE EQUIPMENT: Oil resistant shoes or neoprene apron may be desirable if extensive splashing or spillage occurs.

SECTION IX - SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING: Keep dry and do not heat above flash point. Avoid contamination with acids and solvents.
OTHER PRECAUTIONS

THE INFORMATION CONTAINED HEREIN IS BASED ON DATA CONSIDERED ACCURATE. HOWEVER, NO WARRANTY, EXPRESSED OR IMPLIED, IS GIVEN REGARDING THE ACCURACY OF THESE DATA OR THE RESULTS TO BE OBTAINED ON THE USE THEREOF.

DATE November 21, 1994

MATERIAL SAFETY DATA SHEET

SECTION I

PRODUCT NAME OR NUMBER(AS IT APPEARS ON LABEL) SUPERKOOL 6 (formerly Superkool 201-M)	GM COMMON CODE
MANUFACTURER'S NAME SURBOND LUBRICANTS INC.	EMERGENCY TEL.NO. 1-800-387-7970
ADDRESS 1 MILL ST. , P.O. BOX 346 BATAVIA, NY 14020	MANFACTURERS DUNS # 11-832-3112
HAZARDOUS MATERIAL DESCRIPTION, PROPER SHIPPING NAME, HAZARD CLASS N/A	
ADDITIONAL HAZARD CLASSES N/A	
CHEMICAL FAMILY N/A	FORMULA MIXTURE

SECTION II — INGREDIENTS
(LIST ALL INGREDIENTS)

CAS REG.#	% WT.	CHEMICAL NAME(S)	LISTED AS CARCINOGENIC IN NTP, IARC OR OSHA 1910z
64742-46-7	85-95	HYDROTREATED PETROLEUM OIL	NO
68122-63-4	3-6	SULFO-CHLORINATED FAT	NO
9003-29-6	<1	TACKIFIER ADDITIVE	NO

INDICATES INGREDIENTS REPORTABLE UNDER SARA TITLE III

SECTION III — PHYSICAL DATA

BOILING POINT (^{0}C)	>250	SPECIFIC GRAVITY (WATER = 1)	0.89
VAPOR PRESSURE @ 20^{0}C	<1	PERCENT VOLATILE BY VOLUME	NIL
VAPOR DENSITY (AIR=1)	>1	EVAPORATION RATE slower than butyl acetate	
SOLUBILITY IN WATER	Nil	pH =	N/A
PERCENT SOLID BY WEIGHT	Nil		

APPEARANCE AND ODOR
Clear, brown - low odor

IS MATERIAL: (LIQUID) SOLID
GAS PASTE POWDER

SECTION IV – FIRE AND EXPLOSION HAZARD DATA

FLASH POINT 320^{0}F 160^{0}C METHOD USED: COC FLAMMABLE LIMITS LEL NAV UEL NAV
EXTINGUISHING MEDIA: Water fog or mist, foam, dry chemical, CO_2
SPECIAL FIRE FIGHTING PROCEDURES: Treat as oil fire, keep cool, do not use water on burning liquid
UNUSUAL FIRE AND EXPLOSION HAZARDS: None known

SECTION V – HEALTH HAZARD DATA

EFFECTS OF OVEREXPOSURE - CONDITONS TO AVOID Prolonged exposure to high levels of mist or smoke may cause irritation	THRESHOLD LIMIT VALUE 5 mg/m3 - oil mist PERMISSIBLE EXPOSURE LIMIT _____
PRIMARY ROUTES OF ENTRY: INHALATION X SKIN CONTACT X OTHER SPECIFY _____	
EMERGENCY AND FIRST AID PROCEDURES: Skin - wash with soap & water. Eyes rinse with water for at least 15 min. Inhalation - remove to fresh air.	

SECTION VI – REACTIVITY DATA

STABILITY	UNSTABLE ___ CONDITIONS TO AVOID STABLE X
INCOMPATIBILITY (MATERIALS TO AVOID)	Acids, strong oxidizing agents
HAZARDOUS DECOMPOSITION PRODUCTS:	None
HAZARDOUS POLYMERIZATION	MAY OCCUR ___ CONDITIONS TO AVOID WILL NOT OCCUR X

SECTION VII – SPILL OR LEAK PROCEDURES

TEPS TO BE TAKEN IN CASE MATERIALIS RELEASED OR SPILLED: Contain spill by iking and/or use absorbent

ASTE DISPOSAL METHOD: Dispose according to local & federal regulations

ERCLA (SUPERFUND) REPORTABLE QUANTITY (IN LBS): N/A

CRA HAZARDOUS WASTE NO. (40 CFR 251.33): N/A

OLATILE ORGANIC COMPOUND (VOC) (AS PACKAGED, MINUS WATER): Nil

__ THEORETICAL _____ LB/GAL ___ ANALYTICAL _____ LB/GAL

ECTION – VIII – SPECIAL PROTECTION INFORMATION

ESPIRATORY PROTECTION (SPECIFY TYPE) Filter for oil mists only if above TLV

ENTILATION LOCAL EXHAUST (SPECIFY RATE): As needed to control TLV SPECIAL
MECHANICAL (GENERAL) (SPECIFY RATE) OTHER

ROTECTIVE GLOVES: (SPECIFY TYPE) Oil resistant if needed EYE PROTECTION: (SPECIFY TYPE) Safety glasses or goggles

THER PROTECTIVE EQUIPMENT: Oil resistant shoes or apron may be desirable if xtensive splashing or spillage occurs.

SECTION IX – SPECIAL PRECAUTIONS

RECAUTIONS TO BE TAKEN IN HANDLING AND STORING: Keep dry and do not heat above lash point. Avoid contamination with acids and solvents.

THER PRECAUTIONS

THE INFORMATION CONTAINED HEREIN IS BASED ON DATA CONSIDERED ACCURATE. HOWEVER, NO WARRANTY, EXPRESSED OR IMPLIED, IS GIVEN REGARDING THE ACCURACY OF THESE DATA OR THE RESULTS TO BE OBTAINED ON THE USE THEREOF.

DATE July 1, 1992

MATERIAL SAFETY DATA SHEET

SECTION I

PRODUCT NAME OR NUMBER(AS IT APPEARS ON LABEL) **DASCOLENE NPD 491**	GM COMMON CODE
MANUFACTURER'S NAME SURBOND LUBRICANTS INC.	EMERGENCY TEL.NO. 1-800-387-7970
ADDRESS 1 MILL ST. , P.O. BOX 346 BATAVIA, NY 14020	MANFACTURERS DUNS # 11-832-3112
HAZARDOUS MATERIAL DESCRIPTION, PROPER SHIPPING NAME, HAZARD CLASS PETROLEUM OIL, NOIBN	
ADDITIONAL HAZARD CLASSES N/A	
CHEMICAL FAMILY N/A	FORMULA MIXTURE

SECTION II — INGREDIENTS
(LIST ALL INGREDIENTS)

CAS REG.#	% WT.	CHEMICAL NAME(S)	LISTED AS CARCINOGENIC IN NTP,IARC OR OSHA 1910z
64742-54-7 64742-65-0	85-95	SEVERELY HYDROTREATED SOLVENT REFINED PETROLEUM OIL	NO
68606-23-5	< 2	SULFURIZED OLEFINIC HYDROCARBON	NO
72102-30-8	< 5	SULFURIZED FATTY ACID ESTER	NO
63449-39-8	1-3	CHLORINATED PARAFFIN (does not contain C_{12} 60% material)	NO
61788-61-2	1-3	FATTY ESTER	NO
68334-13-4	1-3	VEGETABLE FATTY ACID ESTER	NO

* INDICATES INGREDIENTS REPORTABLE UNDER SARA TITLE III

MATERIAL SAFETY DATA SHEET

SECTION III — PHYSICAL DATA

BOILING POINT (^{0}C)	>170	SPECIFIC GRAVITY (WATER = 1)	0.88
VAPOR PRESSURE @ 20^{0}C	<1	PERCENT VOLATILE BY VOLUME	NIL
VAPOR DENSITY (AIR=1)	>1	EVAPORATION RATE slower than butyl acetate	
SOLUBILITY IN WATER	Nil	pH =	N/A
PERCENT SOLID BY WEIGHT	Nil		

APPEARANCE AND ODOR
Clear, amber - low odor

IS MATERIAL: (LIQUID) SOLID GAS PASTE POWDER

SECTION IV — FIRE AND EXPLOSION HAZARD DATA

FLASH POINT 390^{0}F 200^{0}C METHOD USED: COC FLAMMABLE LIMITS LEL NAV UEL NAV

EXTINGUISHING MEDIA: Water fog or mist, foam, dry chemical, CO_2

SPECIAL FIRE FIGHTING PROCEDURES: Treat as oil fire, keep cool, do not use water on burning liquid

UNUSUAL FIRE AND EXPLOSION HAZARDS: None known

SECTION V — HEALTH HAZARD DATA

EFFECTS OF OVEREXPOSURE - CONDITONS TO AVOID

Prolonged exposure to high levels of mist or smoke may cause irritation

THRESHOLD LIMIT VALUE 5 mg/m3 - oil mist

PERMISSIBLE EXPOSURE LIMIT _____

PRIMARY ROUTES OF ENTRY: INHALATION X SKIN CONTACT X OTHER SPECIFY _____

EMERGENCY AND FIRST AID PROCEDURES: Skin - wash with soap & water. Eyes rinse with water for at least 15 min. Inhalation - remove to fresh air.

SECTION VI — REACTIVITY DATA

STABILITY	UNSTABLE ___ CONDITIONS TO AVOID STABLE X
INCOMPATIBILITY (MATERIALS TO AVOID)	Acids, strong oxidizing agents
HAZARDOUS DECOMPOSITION PRODUCTS:	On Incineration or Burning: Oxides of carbon and sulfur
HAZARDOUS POLYMERIZATION	MAY OCCUR ___ CONDITIONS TO AVOID WILL NOT OCCUR X

MATERIAL SAFETY DATA SHEET

SECTION VII – SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIALIS RELEASED OR SPILLED: Contain spill by diking and/or use absorbent

WASTE DISPOSAL METHOD: Dispose according to local & federal regulations

CERCLA (SUPERFUND) REPORTABLE QUANTITY (IN LBS): N/A

RCRA HAZARDOUS WASTE NO. (40 CFR 251.33): N/A

VOLATILE ORGANIC COMPOUND (VOC) (AS PACKAGED, MINUS WATER): Nil

___ THEORETICAL _____ LB/GAL ___ ANALYTICAL _____ LB/GAL

SECTION – VIII – SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION (SPECIFY TYPE) Filter for oil mists only if above TLV

VENTILATION LOCAL EXHAUST (SPECIFY RATE): As needed to control TLV SPECIAL
MECHANICAL (GENERAL) (SPECIFY RATE) OTHER

PROTECTIVE GLOVES: (SPECIFY TYPE) Oil resistant if needed

EYE PROTECTION: (SPECIFY TYPE) Safety glasses or goggles

OTHER PROTECTIVE EQUIPMENT: Oil resistant shoes or apron may be desirable if extensive splashing or spillage occurs.

SECTION IX – SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING: Keep dry and do not heat above flash point. Avoid contamination with acids and solvents.

OTHER PRECAUTIONS

THE INFORMATION CONTAINED HEREIN IS BASED ON DATA CONSIDERED ACCURATE. HOWEVER, NO WARRANTY, EXPRESSED OR IMPLIED, IS GIVEN REGARDING THE ACCURACY OF THESE DATA OR THE RESULTS TO BE OBTAINED ON THE USE THEREOF.

DATE November 12, 1992

c:\qmnpd491

SECTION 01: CHEMICAL PRODUCT & COMPANY ID

PRODUCT PRIMARY NAME: HOUGHTO-DRAW 33
CHAT SYNONYMS: HOUGHTO-DRAW 33

MSDS SIGNED BY NAME: ROBERT E. WILLIAMS

SAFE USE CATEGORY AND DESCRIPTION: 04 -METAL WORKING FLUIDS AND LUBRICANTS

MSDS CREATE DATE: 1985-01-01
LAST UPDATED DATE: 1993-04-22

MANUFACTURER'S ID (MID): 000506007
MANUFACTURER'S NAME: HOUGHTON INTERNATIONAL INC.
MANUFACTURER'S EMERGENCY PHONE NUMBER/TEXT: US 215-666-4105 PHONE NUMBER
US 800-424-9300 EMERGENCY
MANUFACTURER'S MAILING ADDRESS:
MADISON & VAN BUREN AVENUE
P.O. BOX 930
VALLEY FORGE PA 19482
US

SECTION 1 - OTHER INFORMATION: PHONE NUMBER: (215) 666-4105. 24-HR EMERGENCY: (800) 424-9300

SECTION 02: COMPOSITION & INGREDIENT INFO

CAS#	FORMULATION	W/V	CHEMICAL NAME
008016282	R 1.0000/ 10.0000%	W	Lard, oil
057855773	< 1.0000/ 0.0000%	W	Naphthalenesulfonic acid, dinonyl-, calcium salt
064741964	< 10.0000/ 30.0000%	W	MINERAL OIL, PETROLEUM DISTILLATES, SOLVENT-REFINED) HEAVY NAPHTHENIC
064741975	< 10.0000/ 30.0000%	W	MINERAL OIL, PETROLEUM DISTILLATES, SOLVENT-REFINED (severe) LIGHT NAPHTHENIC
064742525	R 10.0000/ 30.0000%	W	MINERAL OIL, PETROLEUM DISTILLATES, HYDROTREATED (severe) HEAVY NAPHTHENIC
068410991	> 60.0000/ 0.0000%	W	Alkenes, polymd., chlorinated

SECTION 2 - OTHER INFORMATION: CAS NO#'S 64742525, 64742964, 64741975 COMPRISE 10-30% COMBINED BY WEIGHT.

THRESHOLD LIMIT VALUE: TLV: 5 MG./CU.M.

PERMISSIBLE EXPOSURE LIMIT: PEL: 5 MG./CU.M.

CERCLA (SUPERFUND) REPORTABLE QUANTITY (LBS): (LBS): NONE

SECTION 03: HAZARDS IDENTIFICATION

PRIMARY ENTRY ROUTE INDICATORS:
SKIN PRIMARY ENTRY ROUTE INDICATOR = Y

EYE PRIMARY ENTRY ROUTE INDICATOR = Y
INHALATION PRIMARY ENTRY ROUTE INDICATOR = Y
INGESTION PRIMARY ENTRY ROUTE INDICATOR = Y

EFFECTS OF OVEREXPOSURE: CHRONIC (RECURRENT) EFFECTS: UNKNOWN FOR THIS PRODUCT. ACUTE EFFECTS: INHALATION: AVOID BREATHING PRODUCT MISTS. BREATHING MISTS IN EXCESS OF THE TLV MAY CAUSE IRRITATION OF UPPER RESPIRATORY TRACT. PERSONS WITH CHRONIC RESPIRATORY DISEASE MAY SHOW INCREASED SYMPTOMS DUE TO IRRITATION. SKIN: MAY BE A MILD IRRITANT ON PROLONGED CONTACT. EYE: MILD IRRITANT INGESTION: NO SIGNIFICANT EFFECTS KNOWN. MAY CAUSE NAUSEA.
MEDICAL CONDITIONS AGGRAVATED BY EXPOSURE: PERSONS WITH CHRONIC RESPIRATORY DISEASE MAY SHOW INCREASED SYMPTOMS DUE TO IRRITATION

SECTION 04: FIRST AID MEASURES

EMERGENCY FIRST AID PROCEDURES - SKIN: WASH WITH SOAP AND WATER
EMERGENCY FIRST AID PROCEDURES - EYES: FLUSH WITH WATER 15 MINUTES, CONSULT PHYSICIAN.
EMERGENCY FIRST AID PROCEDURES - INHALATION: MISTS-REMOVE TO SOURCE OF FRESH AIR.
EMERGENCY FIRST AID PROCEDURES - INGESTION: DO NOT INDUCE VOMITING; CONSULT PHYSICIAN. PRODUCT CONTAINS MOSTLY CHLORINATED OLEFIN.

SECTION 05: FIRE-FIGHTING MEASURES

EXTINGUISHING MEDIA: CARBON DIOXIDE, FOAM, DRY CHEMICAL

SPECIAL FIRE FIGHTING PROCEDURES: PROTECTION AGAINST DECOMPOSITION PRODUCT; HYDROGEN CHLORIDE

UNUSUAL FIRE AND EXPLOSION HAZARDS: MAY DECOMPOSE UNDER FIRE CONDITIONS, GIVING OFF FUMES OF HYDROGEN CHLORIDE. VENT CONTAINERS ABOVE 40 DEG.C
HMIS CODES:
HMIS REACTIVITY CODE = 0
HMIS HEALTH CODE = 2
HMIS FLAMMABILITY CODE = 1
NFPA CODES:
NFPA FLAMMABILITY CODE = 1
NFPA HEALTH CODE = 2
NFPA REACTIVITY CODE = 0

FLASH POINT TEMPS: = 275.00F
FLASH POINT METHOD: COC

SECTION 06: ACCIDENTAL RELEASE MEASURES

SPILL OR LEAK PROCEDURES: APPLY DRY OIL ABSORBENT TYPE MATERIAL AND SWEEP UP.

ENVIRONMENTAL IMPACT: NOT CONSIDERED A POLLUTANT IF EFFECTIVE WASTE DISPOSAL METHODS ARE UTILIZED. PRODUCT IS HEAVIER THAN WATER; KEEP OUT OF SEWERS AND STREAMS.

SECTION 07: HANDLING AND STORAGE

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE: AVOID OVERHEATING OF DRUMS AS HYDROGEN CHLORIDE CAN BE EVOLVED AT ELEVATED TEMPERATURES IN PRESENCE OF IRON. DO NOT STORE ABOVE 120 DEG. F. FOR PROLONGED PERIODS.

SECTION 08: EXPOSURE CONTROLS - PROTECTION

EYE PROTECTION: SAFETY GOGGLES

SKIN PROTECTION: RUBBER GLOVES IF SKIN IS SENSITIVE.

RESPIRATORY PROTECTION: REQUIRED ONLY IF TLV FOR OIL MIST IS EXCEEDED.

VENTILATION: EXHAUST TYPE IF MISTING; OTHERWISE GENERAL TYPE IS SATISFACTORY

SECTION 8 - OTHER INFORMATION: OTHER PROTECTIVE EQUIPMENT: NOT REQUIRED

SECTION 09: PHYSICAL & CHEMICAL PROPERTIES

BOILING POINT TEMPS: R 300.00F TO 450.00F

SPECIFIC GRAVITY VALUES: = 1.1000

VAPOR DENSITY VALUES: > 5.0000
VAPOR DENSITY TEXT: (AIR = 1)
VAPOR PRESSURE VALUES/UOM: < 1.0000MMHG

PERCENT SOLID BY WEIGHT VALUES: = 100.0000

EVAPORATION RATE VALUES: > 200.00
EVAPORATION RATE TEXT: (ETHER = 1)

SOLUBILITY IN WATER TEXT: INSOLUBLE

PACKAGED PH NUMBER CONCENTRATION TEXT: N/A PH AT %:

APPEARANCE: YELLOW-BROWN, CLEAR LIQUID

ODOR: BLAND ODOR

PHYSICAL STATE: LIQ

SECTION 9 - OTHER INFORMATION: PERCENT VOLATILE: 1-10

SECTION 10: STABILITY & REACTIVITY

STABILITY INDICATOR: Y
STABILITY - CONDITIONS TO AVOID: DO NOT STORE ABOVE 120 DEF. F. FOR PROLONGED PERIODS.

INCOMPATIBLE MATERIALS: STRONG OXIDIZERS

HAZARDOUS DECOMPOSITION PRODUCTS: THERMAL; OXIDES OF CARBON; HYDROGEN CHLORIDE

HAZARDOUS POLYMERIZATION INDICATOR: N

HAZARDOUS POLYMERIZATION TEXT: WILL NOT OCCUR

SECTION 11: TOXICOLOGICAL INFORMATION

CARCINOGENICITY: AS DEFINED BY- NTP: NONE IARC: NONE OSHA: NONE

SECTION 13: DISPOSAL CONSIDERATIONS

WASTE DISPOSAL METHOD: SECURED CHEMICAL LANDFILL IS RECOMMENDED. DO NOT INCINERATE BECAUSE OF POSSIBILITY OF FORMATION OF HYDROGEN CHLORIDE.

SECTION 14: TRANSPORT INFORMATION

SHIPPING NAME: METAL CUTTING DRAWING COMPOUND

HAZARD CLASS: NON-HAZARDOUS

SECTION 14 - OTHER INFORMATION: HAZARD ID NO: N/A

SECTION 15: REGULATORY INFORMATION

SECTION 15 - OTHER INFORMATION: SARA TITLE III, SECTION 313 THIS PRODUCT CONTAINS NO TOXIC CHEMICAL SUBJECT TO THE REPORTING REQUIREMENTS OF SECTION 313 OF TITLE III OF THE SUPERFUND AMENDMENTS AND REAUTHORIZATION ACT OF 1986 AND 40 CFR PART 372.

SECTION 16: OTHER INFORMATION

SECTION 16 - OTHER INFORMATION: STEL: 10 MG./CU.M. AS OIL MIST

RCRA HAZARDOUS WASTE NUMBER TEXT: HAZARDOUS WASTE NUMBER: N/A

SAFE USE CATEGORY AND DESCRIPTION :

04 METAL WORKING FLUIDS AND LUBRICANTS

REGULATORY IMPACTS(REG) AND ADDITIONAL HEALTH HAZARD STATEMENTS(HHS) :

CAS#: 008016282 Lard, oil
REG: 0012 TSCA INVENTORY
0046 SARA 311,312: OSHA HAZARDOUS CHEMICALS
0061 PENNSYLVANIA WORKER & COMMUNITY RIGHT TO KNOW

CAS#: 057855773 Naphthalenesulfonic acid, dinonyl-, calcium salt
REG: 0012 TSCA INVENTORY

CAS#: 064741964 MINERAL OIL, PETROLEUM DISTILLATES, SOLVENT-REFINED (s
REG: 0012 TSCA INVENTORY

CAS#: 064741975 MINERAL OIL, PETROLEUM DISTILLATES, SOLVENT-REFINED (se
REG: 0012 TSCA INVENTORY

CAS#: 064742525 MINERAL OIL, PETROLEUM DISTILLATES, HYDROTREATED (sever
REG: 0012 TSCA INVENTORY

CAS#: 068410991 Alkenes, polymd., chlorinated
REG: 0012 TSCA INVENTORY

GMBA/PLANT USING THIS FID:

GMBA: 000550902 AC DELCO SYSTEMS - ROCHESTER
CISCO: 58001;
STATUS: ACTIVE

DOC 6 2 PAGES

FREE-COL LABORATORIES, INC.

P.O. BOX 557,COTTON ROAD
MEADVILLE, PENNSYLVANIA 16335
PHONE: (814) 724-6242
FAX: (814) 333-1466

5815 AIRPORT ROAD
ROANOKE, VIRGINIA 24012
PHONE: (703) 265-2544
FAX: (703) 362-1663

06/02/94

TO: AC ROCHESTER DIV.-GMC
ATTN: MR. DAN COLTONIAK
1000 LEXINGTON AVE.,DEPT.12820
ROCHESTER NY 14606

P.O. # RPB00186

ACCOUNT NO. 01267

ANALYTICAL REPORT FORM

PAGE 1

SAMPLE ID : ~~REC. OIL SW-2~~ (22)
05/24/94
LAB ID 40526408
DATE RECEIVED: 05/26/94

CWTA INSIDE OIL TANKS TO BE SHIPPED DURING 6/13-17/94

PARAMETER	RESULTS	UNITS	DATE AND ANALYST
Flashpoint	>200	DEGREES F	05/31/94 PEARSON

Flashpoint - Method - 1010

"Test Methods for Evaluating Solid Waste: Physical/Chemical Methods", SW-846, Third Edition, U.S. Environmental Protection Agency. Revised 1986.

This complete reppрt is one page.

MATERIALS ENGINEERING INVESTIGATION REQUEST

Engineer Assigned ____________ Request No. ____________

Requested By Rich Zwolak Dept. 13879 Ext. 7474

P/N ____________ Part Name ____________ Product ____________

Material ____________	Vendor ____________	HT. # ____________
Date Rec'd ____________	Quantity ____________	Lot No. ____________

Description of Problem/Required Analysis:

Scrap Oil →

Total Halogens
Trichlor
Perchlor
Methylene Chloride

} Please Rush Solvent Analysis

PCB's

Date Submitted 6-2-94 Requested Completion Date ASAP

Results:

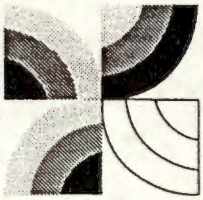
Sample sent to outside
Lab for chemical analysis
see attached results

Data on Back of T.R. [ ] Report Issued [ ] Report No. ____________

Free-Col Labs / Don Abtil — Signature of Analyst

7/5/94 — Date

FREE-COL LABORATORIES, INC.
P.O. Box 557, Cotton Road
Meadville, Pennsylvania 16335-0557
Phone: Area Code 814/724-6242
FAX: Area Code 814/333-1466



ENVIRONMENTAL
OCCUPATIONAL HEALTH
FOOD SCIENCE
SPECIALISTS

AC ROCHESTER DIVISION
GENERAL MOTORS CORPORATION

SCRAP OIL

SAMPLE DATE: 06/01/94

FREE-COL LABORATORIES, INC.

P.O. BOX 557,COTTON ROAD
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PHONE: (814) 724-6242
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5815 AIRPORT ROAD
ROANOKE, VIRGINIA 24012
PHONE: (703) 265-2544
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06/15/94

TO:

AC ROCHESTER DIV.-GMC
ATTN: MR. DAN COLTONIAK
1000 LEXINGTON AVE.,DEPT.12820
ROCHESTER NY 14606

P.O. # RPB00186

ACCOUNT NO. 01267

ANALYTICAL REPORT FORM

SAMPLE ID : SCRAP OIL
06/01/94

LAB ID 40602410
DATE RECEIVED: 06/02/94

PARAMETER	RESULTS	UNITS	DATE AND ANALYST
Trichloroethylene	<2.5 D	MG/KG	06/03/94 ECKLUND
Perchloroethylene	<2.5 D	MG/KG	06/03/94 ECKLUND
Methylene Chloride	<2.5 D	MG/KG	06/03/94 ECKLUND
Volatile Set-up	COMPLETE		
T.O.X (Bomb)	1,950	MG/KG	06/13/94 OSBORN

Volatile Compounds - Method - 8240A

"Test Methods for Evaluating Solid Waste: Physical/Chemical Methods", SW-846, Third Edition, U.S. Environmental Protection Agency. Revised 1986.

T.O.X. - Method - D808-81

Annual Book of ASTM Standards.

FREE-COL LABORATORIES, INC.

P.O. BOX 557,COTTON ROAD
MEADVILLE, PENNSYLVANIA 16335
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5815 AIRPORT ROAD
ROANOKE, VIRGINIA 24012
PHONE: (703) 265-2544
FAX: (703) 362-1663

06/15/94

TO:

AC ROCHESTER DIV.-GMC
ATTN: MR. DAN COLTONIAK
1000 LEXINGTON AVE.,DEPT.12820
ROCHESTER NY 14606

P.O. # RPB00186

ACCOUNT NO. 01267

ANALYTICAL REPORT FORM

SAMPLE ID : SCRAP OIL
06/01/94

LAB ID 40602410
DATE RECEIVED: 06/02/94

PARAMETER	RESULTS	UNITS	DATE AND ANALYST
PCB			
PCB in oil-1221	<1.0 D	MG/KG	06/03/94 LEMISH
PCB in oil-1232	<1.0 D		
PCB in oil-1248	<1.0 D		
PCB in oil-1260	<1.0 D		
PCB in oil-1016	<1.0 D		
PCB in oil-1242	<1.0 D		
PCB in oil-1254	<1.0 D		
PCB in oil-1262	<1.0 D		

PCB - Method - 8080A

"Test Methods for Evaluating Solid Waste: Physical/Chemical Methods", SW-846, Third Edition, U.S. Environmental Protection Agency. Revised 1986.

The Volatile Compounds and PCB's required dilutions to reduce interferences.

This complete report is two pages.

Andrew K. Ecklund
ASST. LABORATORY DIRECTOR

FREE-COL LABORATORIES, INC.
P.O. BOX 557,COTTON ROAD
MEADVILLE, PENNSYLVANIA 16335
PHONE: (814) 724-6242
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5815 AIRPORT ROAD
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PHONE: (703) 265-2544
FAX: (703) 362-1663

O:

Results expressed as MG/KG or % are calculated on an as received weight basis.

ANALYTICAL REPORT FORM

CODE B: This analyte was detected in the associated blank as well as in the sample. It indicates possible/probable contamination. The data user may subtract the blank value from the sample value at his/her discretion.

CODE D: Detection limit change due to a dilution.

CODE R: The percent recovery on the spike sample associated with this sample was not within the acceptance limits of 75 - 125 percent.

CODE S: This result was obtained by Method of Standard Additions.

CODE NA: Not Applicable

CODE ND: Not Detectable

PRC: Preparation Reference Control

VOID: The sample plus spike concentration exceeded the linear range of the standard curve.

CODE Q: Values for parameters quantified in this sample have been adjusted for recoveries of the analytical matrix spike. The adjustments have been based on the matrix recoveries from this sample. Adjusted values are not given where sample values were less than the detection limit or where spike recoveries are equal to 100 percent.

CODE J: This result is an estimated value. It indicates that the compound meets the mass spectral data identification criteria. The result is less than the quantitation limit but greater than zero.

CHAIN OF CUSTODY RECORD

FREE-COL LABORATORIES, INC.

P.O. BOX 557 TEL 800 836 - 4130
COTTON ROAD TEL 814 724 - 6242
MEADVILLE, PA 16335 FAX 814 333 - 1466

1 CLIENT INFORMATION				2 TYPE
COMPANY	AC Rochester			Wastewater
CONTACT	Dan Coltoniack			Monitoring Wells
ADDRESS	1000 Lexington Ave			Drinking Water
CITY	Rochester			PWS #
STATE	NY	ZIP CODE	14606	NPDES / SPDES
PHONE	(716) 647-4468	FAX		SOLID WASTE
PURCHASE ORDER NUMBER				I. H.
CLIENT NUMBER	001649			OTHER Waste Oil

3 PROJECT NAME / NUMBER
4 SAMPLER'S NAME / DATE

5 SAMPLE INFORMATION

	DATE	TIME	SAMPLE ID	TYPE	GRAB or COMP	ANALYSIS REQUESTED / COMMENTS
					GRAB/COMP	
1	6 / 1 /94	:	Scrap Oil		Grab	*Trichlor, Perchlor, Methylene Chloride
2	/ /94	:				Plese Rush
3	/ /94	:				
4	/ /94	:				Total Halogens
5	/ /94	:				
6	/ /94	:				PCB's
7	/ /94	:				
8	/ /94	:				
9	/ /94	:				
10	/ /94	:				
11	/ /94	:				

6 SAMPLE TRACABILITY

	Received	SIGNATURE	ORGANIZATION	Relinquished
1	6/2/94	Dan Colt	AC Roch	6/2/94
2	6/2/94	Thomas J Mulligan	Free-Col Labs	6/2/94
3	6/2/94	Joni Kearns	Free-Col	6/2/94
4	/ /94	Andrew Eckland	Free Col	6/2/94
5	/ /94			/ /94
6	/ /94			/ /94
7	/ /94			/ /94

USE BY LABORATORY ONLY

	Date	Time
Samples rec. at lab	/ /94	:
Means of del. to lab		
Sample cooler temp. upon receipt		(deg. C)
Sample check in started	6-2-94	
Sample check in completed	6-2-94	
Samples refrigerated upon receipt at lab	Yes	No
Samples refrigerated upon receipt from client	Yes	No

FREE-COL LABORATORIES, INC.

:CH FOR RESULTS PRODUCED ON 06/07/94 AT 10:03 PAGE 1

LE #	RSLT.LNE	SAM. ID1	SAM. ID2	SAM. ID3
)241000	VOLATILE SET-UP : COMPLETE	SCRAP OIL	06/01/94	
)241000	PCB IN OIL-1221 : <1.0 D	SCRAP OIL	06/01/94	
)241000	PCB IN OIL-1232 : <1.0 D	SCRAP OIL	06/01/94	
)241000	PCB IN OIL-1248 : <1.0 D	SCRAP OIL	06/01/94	
)241000	PCB IN OIL-1260 : <1.0 D	SCRAP OIL	06/01/94	
)241000	PCB IN OIL-1016 : <1.0 D	SCRAP OIL	06/01/94	
)241000	PCB IN OIL-1242 : <1.0 D	SCRAP OIL	06/01/94	
)241000	PCB IN OIL-1254 : <1.0 D	SCRAP OIL	06/01/94	
)241000	PCB IN OIL-1262 : <1.0 D	SCRAP OIL	06/01/94	
241000	TRICHLORDETHYLENE : <2.5 D	SCRAP OIL	06/01/94	
)241000	PERCHLORDETHYLENE : <2.5 D	SCRAP OIL	06/01/94	
241000	METHYLENE CHLORIDE : <2.5 D	SCRAP OIL	06/01/94	

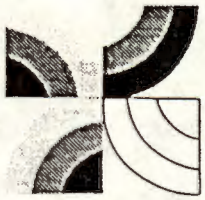
12 RECORDS EXAMINED ; 12 SELECTIONS QUALIFIED

UNITS= MG/KG

Post-it™ brand fax transmittal memo 7671 | # of pages ▸ 1

To DAN COLTONIAK	From TERESA
Co. AC ROCHESTER	Co. FREE-COL
Dept.	Phone #
Fax #	Fax #

FREE-COL LABORATORIES, INC.
P.O. Box 557, Cotton Road
Meadville, Pennsylvania 16335-0557
Phone: Area Code 814/724-8242
FAX: Area Code 814/333-1466



ENVIRONMENTAL
OCCUPATIONAL HEALTH
FOOD SCIENCE
SPECIALISTS

QUALITY CONTROL INFORMATION

Free-Col Laboratories analyzes control samples at specified frequencies during the analyses for the purpose of evaluating and documenting the precision and accuracy of the results. The attached quality control data, prepared at the time of analysis, reflect the results obtained for the various types of controls from the batch of samples described as follows:

General Motors Sample Identification	Free-Col ID
SCRAP OIL 06/01/94	40602410

Special Notes:

1. The results on the analytical report may be given as mg/kg and related control value results may be given on the quality control data sheet as mg/L. The reason for this difference is that many control values are expressed in terms of the final concentration of the solvent or acid extract of a solid waste or oil sample.

Free-Col Laboratories, Inc.
Surrogate Spike Information
Method 8240

:: 6/3/94 Analyst: Ecklund

:s: % Recovery

:: W = Low/Medium Water
S = Low/Medium Soil/Sediment

	1,2-Dichloro-ethane-d_4	Toluene-d_8	4-Bromofluoro-benzene
Limits:			
Water	76-114	88-110	86-115
Soil/Sediment	70-121	81-117	74-121

	Free-Col I.D.			
	406-02-410	98.8	94.4	107

FREE-COL LABORATORIES, INC.
VOA BLANK INFORMATION
(CLP - CALIBRATION BLANK LIMITS)

Date 6/3/94 Analyst Ecklund

Samples associated with this blank:

401-02-410

Parameter	Blank Value
Units = mg/L	
Chloromethane	
Bromomethane	
Vinyl chloride	
Chloroethane	
Methylene chloride	<0.002
Acrolein	
Acrylonitrile	
1,1-Dichloroethene	
1,1-Dichloroethane	
trans-1,2-Dichloroethene	
Chloroform	
1,2-Dichloroethane	
1,1,1-Trichloroethane	
Carbon tetrachloride	
Bromodichloromethane	
1,2-Dichloropropane	
trans-1,3-Dichloropropene	
Trichloroethene	<0.002
Benzene	
Dibromochloromethane	
1,1,2-Trichloroethane	
cis-1,3-Dichloropropene	
2-Chloroethyl vinyl ether	
Bromoform	
Tetrachloroethene	<0.002
1,1,2,2-Tetrachloroethane	
Toluene	
Chlorobenzene	
Ethyl benzene	
1,3-Dichlorobenzene	
1,2-Dichlorobenzene	
1,4-Dichlorobenzene	
Xylene	
2-Butanone - MEK	
4-Methyl-2-pentanone	
Acetone	
Syrene	

Limits in effect as of May 17, 1993

FREE-COL LABORATORIES, INC.
VOA SPIKED CONTROL INFORMATION
(CLP - ANALYTICAL SPIKED SAMPLE LIMITS)

Date 6/3/94 Analyst Ecklund

Samples associated with this spiked control:

406-02-410

406-02-091

Sample used as spiked control: 406-02-091

PARAMETER	SPIKE ADDED UG/L	SPIKED RESULT UG/L	SAMPLE RESULT UG/L	ACCEPT. LIMITS % REC.	ASSYD % REC.	FILE
Chloromethane	20			19-189		520
Bromomethane	20			18-231		519
Vinyl chloride	20			31-177		528
Chloroethane	20			53-169		507
Methylene chloride	20	22	6	53-165	110	521
Acrolein	62			28-174		500
Acrylonitrile	58			45-178		501
1,1-Dichloroethene	20			59-158		513
1,1-Dichloroethane	20			68-154		511
trans-1,2-Dichloroethene	20			70-151		514
Chloroform	20			70-149		509
1,2-Dichloroethane	20			59-160		512
1,1,1-Trichloroethane	20			67-150		525
Carbon tetrachloride	20			45-149		504
Bromodichloromethane	20			53-145		510
1,2-Dichloropropane	20			72-147		515
trans-1,3-Dichloropropene	20			62-137		517
Trichloroethene	20	19	<2	63-146	95	527
Benzene	20			75-143		502
Dibromochloromethane	20			37-154		506
1,1,2-Trichloroethane	20			67-148		526
cis-1,3-Dichloropropene	20			53-150		516
2-Chloroethyl vinyl ether	20			15-187		508
Bromoform	20			11-162		503
Tetrachloroethene	20	23	<2	56-165	115	523
1,1,2,2-Tetrachloroethane	20			60-150		522
Toluene	20			68-147		524
Chlorobenzene	20			69-142		505
Ethyl benzene	20			63-148		518
1,3-Dichlorobenzene	26			66-157		530
1,2-Dichlorobenzene	26			56-153		529
1,4-Dichlorobenzene	20			46-170		531
Diethyl Benzene	44			71-137		533
Ethyl Ether	35			62-160		532
Xylenes	44			72-130		534
MEK	20			64-177		536

Limits in effect as of May 17, 1993

FREE-COL LABORATORIES, INC.
VOA REPEAT CONTROL INFORMATION
(CLP - DUPLICATE SAMPLE LIMITS)

Date 6/3/94 Analyst ECKLUND

Samples associated with this repeat control:

406-02-410

406-02-091

Sample used as repeat control: 406-02-091

AD = Absolute Difference RPD = Relative Percent Difference

Units = mg/L

Parameter	Samp. Value	Repeat Value	Accept AD	Accept RPD	Assayd AD/RPD	File
Chloromethane						820
Bromomethane						819
Vinyl chloride				27		828
Chloroethane						807
Methylene chloride	0.006	0.006		17	-0-	821
Acrolein						800
Acrylonitrile						801
1,1-Dichloroethene						813
1,1-Dichloroethane				41		811
trans-1,2-Dichloroethene				27		814
Chloroform				19		809
1,2-Dichloroethane						812
1,1,1-Trichloroethane				27		825
Carbon tetrachloride						804
Bromodichloromethane				79		810
1,2-Dichloropropane						815
trans-1,3-Dichloropropene						817
Trichloroethene	<0.002	<0.002		32	-0-	827
Benzene				49		802
Dibromochloromethane				70		806
1,1,2-Trichloroethane						826
cis-1,3-Dichloropropene						816
2-Chloroethyl vinyl ether						808
Bromoform						803
Tetrachloroethene	<0.002	<0.002		35	-0-	823
1,1,2,2-Tetrachloroethane						822
Toluene				38		824
Chlorobenzene				24		805
Ethyl benzene				5		818
1,3-Dichlorobenzene						830
1,2-Dichlorobenzene						829
1,4-Dichlorobenzene				36		831
Acetone				26		836

Limits in effect as of May 17, 1993

FREE-COL LABORATORIES, INC.
VOA REFERENCE CONTROL INFORMATION
(CLP - CALIBRATION VERIFICATION LIMITS)

Date 6/3/94 Analyst Ecklund

Samples associated with this reference control:

406-02-410

Parameter	Target Value ug/L	Acceptance Limits ug/L	Assayed Value ug/L	File#
Chloromethane	20	4.9-35.0		223
Bromomethane	20	8.1-34.7		222
Vinyl chloride	20	1.0-42.9		232
Chloroethane	20	3.8-37.2		209
Methylene chloride	20	11.4-31.5	22.2	224
Acrolein	62	3.2-105.9		201
Acrylonitrile	58	13.6-116.6		202
1,1-Dichloroethene	20	10.8-32.6		216
1,1-Dichloroethane	20	15.1-28.0		214
trans-1,2-Dichloroethene	20	13.5-28.5		217
Chloroform	20	15.5-26.3		211
1,2-Dichloroethane	20	14.6-29.0		215
1,1,1-Trichloroethane	20	13.6-29.9		228
Carbon tetrachloride	20	7.7-28.1		206
Bromodichloromethane	20	9.5-30.1		212
1,2-Dichloropropane	20	15.2-28.1		218
trans-1,3-Dichloropropene	20	12.8-25.4		220
Trichloroethene	20	13.9-27.3	22.9	230
Benzene	20	14.5-28.0		203
Dibromochloromethane	20	4.0-29.5		208
1,1,2-Trichloroethane	20	14.1-28.6		229
cis-1,3-Dichloropropene	20	10.1-26.9		219
2-Chloroethyl vinyl ether	20	9.7-32.6		210
Bromoform	20	2.1-31.2		205
Tetrachloroethene	20	12.9-29.0	22.4	226
1,1,2,2-Tetrachloroethane	20	14.7-26.1		225
Toluene	20	15.1-25.6		227
Chlorobenzene	20	11.0-29.0		207
Ethyl benzene	20	13.1-27.8		221
1,3-Dichlorobenzene	26	18.0-36.9		234
1,2-Dichlorobenzene	26	10.8-42.3		233
1,4-Dichlorobenzene	20	6.5-33.5		235
Diethyl Benzene	44	25.9-62.9		237
Ethyl Ether	35	26.9-49.4		236
Xylene	44	21.0-66.7		238
MEK	20	9.1-39.4		240
Acetone	20	9.6-38.0		242

QUALITY CONTROL DATA I

PARAMETER: Chloride / TOH Bomb ANALYST: OSBorn DATE: 6/13/94

REFERENCE CONTROL UNITS: mg/L

Target	Acceptance Limits						
60	54.6	to 62.6	60.6	58.6			
		to					
		to					

PREPARATION REFERENCE CONTROL Units: mg/L

Target	Acceptance Limits		Assayed Value:		
60	40.0	to 54.0	Date Prepped:	6/13/94	

REPEAT CONTROL AD = Absolute Difference RPD = Relative Percent Difference
Units: mg/L Acceptable AD: 1 Acceptable RPD: 9.9 %

Sample I.D.	Sample Result	Repeat Result	AD	RPD
				%
406-09-45(B)	2.0	1.5	0.5	— %
				%
				%
				%
				%

SPIKE CONTROL Units: mg/L
Acceptable Limits for Percent Recovery: 85 % to 117 %

Sample ID	Spike Added	Spike Result	Sample Result	% Recovery
				%
406-02-410	10	30.3	19.5	108 %
				%
				%

BLANK Units: mg/L

L. Blank 6-2-94 <0.5

Result: , , , , ,

DETECTION LIMIT Units: mg/L

Limit Value: 0.5 Assayed Value: 0.5 , ,

FREE-COL LABORATORIES, INC.
P.O. Box 557, Cotton Road
Meadville, PA 16335
(814) 724-6242

LIMITS IN EFFECT AS OF JANUARY 23, 1992

DSB 6.14

QUALITY CONTROL DATA I

TER: PCB 1254 ANLAYST: A. Lomax DATE: 6-2-94

ENCE CONTROL UNITS: mg/L

get	Acceptance Limits						
1.0	0.716	to 1.28	0.78	0.99	———	———	———
———	———	to ———	———	———	———	———	———
———	———	to ———	———	———	———	———	———

RATION REFERENCE CONTROL Units: ———

iet	Acceotance Limits		Assayed Value:			
———	———	to ———	Date Prepped:	———	———	———

T CONTROL AD = Absolute Difference RPD = Relative Percent Difference
s: ——— Acceptable AD: ——— Acceptance RPD: 5.9 %

le I.D.	Sample Result	Repeat Result	AD	RPD
31-24	3.58	3.56	0.02	——— %
———	———	———	———	——— %
———	———	———	———	——— %
———	———	———	———	——— %
———	———	———	———	——— %
———	———	———	———	——— %

E CONTROL Units: ———
ptable Limits for Percent Recovery: 71.5 % to 136.07 %

le I.D.	Spike Added	Spike Result	Sample Result	% Recovery
31-24	1.0	2.95	1.75	116 %
———	———	———	———	——— %
———	———	———	———	——— %
———	———	———	———	——— %

NK Units: ———

lt: ———, ———, ———, ———, ———, ———

ECTION LIMIT Units: mg/L
it Value: 0.1 Assayed Value: 0.2, ———, ———

FREE-COL LABORATORIES, INC.
P.O. Box 557 Cotton Road
Meadville, PA 16335
(814)724-6242

LIMITS IN EFFECT AS OF JUNE 11, 1990

405-31-24

QUALITY CONTROL DATA I

METER: PCB/1260 ANLAYST: A. Smith DATE: 6.2.94

ERENCE CONTROL UNITS: mg/L

arget	Acceptance Limits						
1.0	0.758 to 1.30	1.04	1.04	____	____	____	
____	____ to ____	____	____	____	____	____	
____	____ to ____	____	____	____	____	____	

EPARATION REFERENCE CONTROL Units: ____

arget	Acceotance Limits	Assayed Value:			
____	____ to ____	Date Prepped:	____	____	____

EAT CONTROL AD = Absolute Difference RPD = Relative Percent Difference
its: mg/L Acceptable AD: 0.7 Acceptance RPD: 17.2 %

mple I.D.	Sample Result	Repeat Result	AD	RPD
05 3126	2.09	2.33	0.24	10.9 %
____	____	____	____	____ %
____	____	____	____	____ %
____	____	____	____	____ %
____	____	____	____	____ %
____	____	____	____	____ %

IKE CONTROL Units: mg/L
ceptable Limits for Percent Recovery: 64.23 % to 141.7 %

mple I.D.	Spike Added	Spike Result	Sample Result	% Recovery
05-31-26	1.0	1.93	~~1.17~~ 1.08	85.2 %
____	____	____	____	____ %
____	____	____	____	____ %
____	____	____	____	____ %

LANK Units: ____

esult: ____, ____, ____, ____, ____, ____

ETECTION LIMIT Units: mg/L
i Value: 0.1 Assayed Value: 0.4, ____, ____

FREE-COL LABORATORIES, INC.
P.O. Box 557 Cotton Road
Meadville, PA 16335
(814)724-6242
LIMITS IN EFFECT AS OF JUNE 11, 1990

406-02-410
406-01-118
405-31-25+26

ITEM #8

New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233

Thomas C. Jorling
Commissioner

July 24, 1990

Mr. Dennis Grady
General Motors Corporation
Rochester Products Division
1000 Lexington Avenue
Rochester, New York 14692

Dear Mr. Grady:

RE: Closure of General Motors - Rochester Products Division

EPA Identification Number: NYD002215234

This letter is to confirm the receipt of owner/operator and independent professional engineer's certification dated January 18, 1990, of RCRA closure for this facility. We now consider this facility officially closed. Your authority to operate as a Treatment, Storage, and Disposal Facility (TSDF) is terminated.

Please be advised that the United States Environmental Protection Agency has determined that the corrective action provisions of the Hazardous and Solid Waste Amendments (HSWA), Section 3008(h), apply to all TSDF's which have acquired interim status.

The New York State Department of Environmental Conservation has established a program to evaluate the corrective action measures necessary at closed and closing facilities within the State. Once the corrective action provisions of HSWA have been met by the facility or determined not to be necessary at the facility, the facility can have their interim status terminated.

If you have any questions regarding your closure or regulatory status, please contact Gary Belcher at (518) 457-9361.

Sincerely,

Salvatore J. Carlomagno, P.E.
Chief, Regional Permit Section
Bureau of Haz. Waste Facility Compliance
Division of Haz. Substances Regulation

cc: J. Gorman
J. Desai
D. Rollins - Region 8

SJC:scy

DELPHI-E LEXINGTON AVENUE

SITE REMEDIATION PROGRAM

BACKGROUND

In the early 1980s, samples from a limited number of monitoring wells installed on GM property along Driving Park Avenue indicated that the groundwater was contaminated. Based on groundwater data and reports of historical fill activities, in 1987 the Lexington Avenue facility was listed as an "Inactive Hazardous Waste Disposal Site" by the New York Department of Environmental Conservation (DEC). The site is classified as Code 2 .

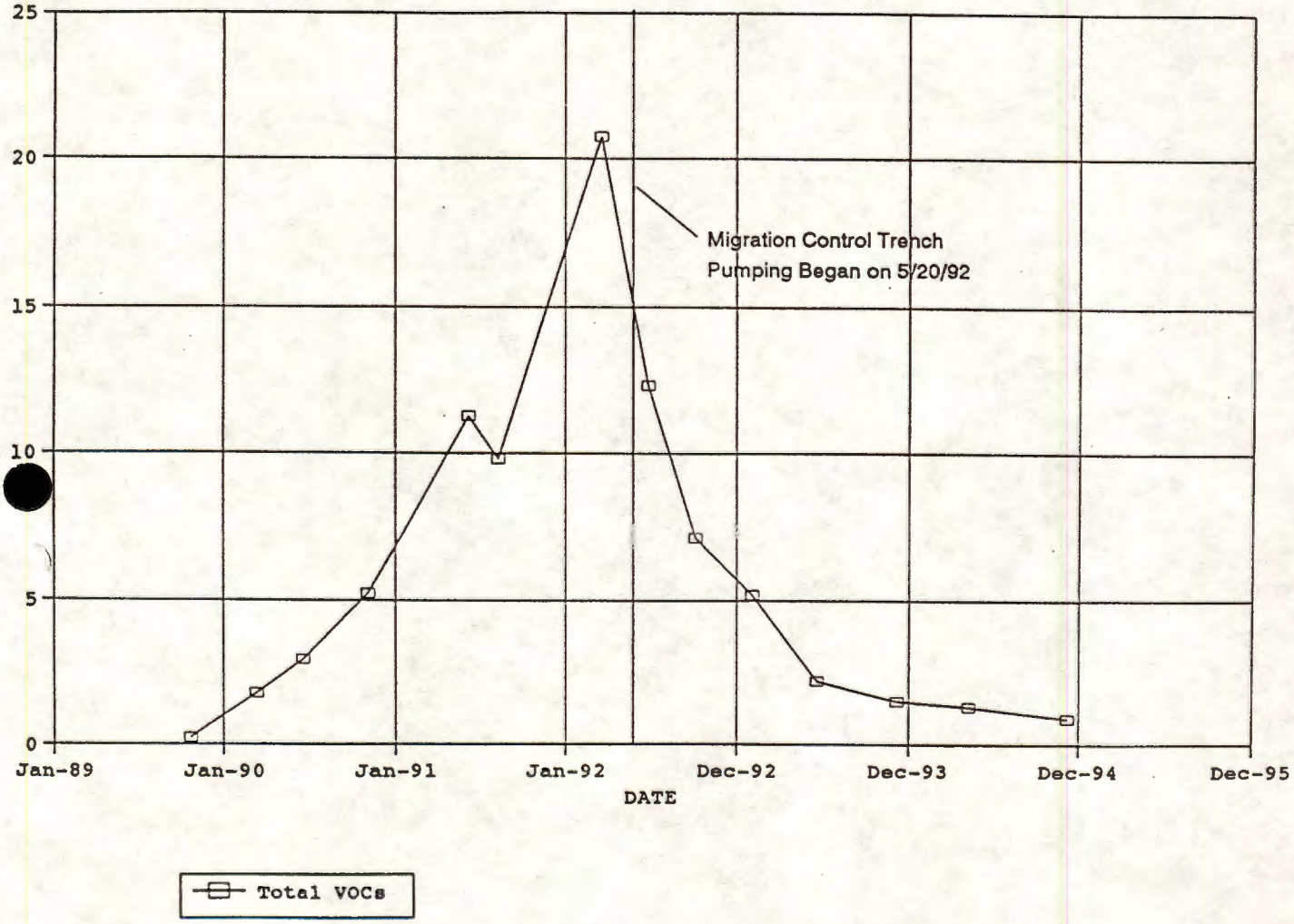
In 1988, Delphi-E contracted with H & A of New York to conduct an detailed investigation of the degreasing solvent groundwater contamination problem. Numerous wells and borings have been installed, culminating in the design and installation of a groundwater migration control system. The system uses two pumping wells and a fractured bedrock groundwater interception system to prevent off-site migration of contaminated groundwater. Groundwater is treated through a UV/hydrogen peroxide treatment system and discharged to the county sewer system. The system has been operational since mid 1992, and fenceline contaminant concentrations are declining.

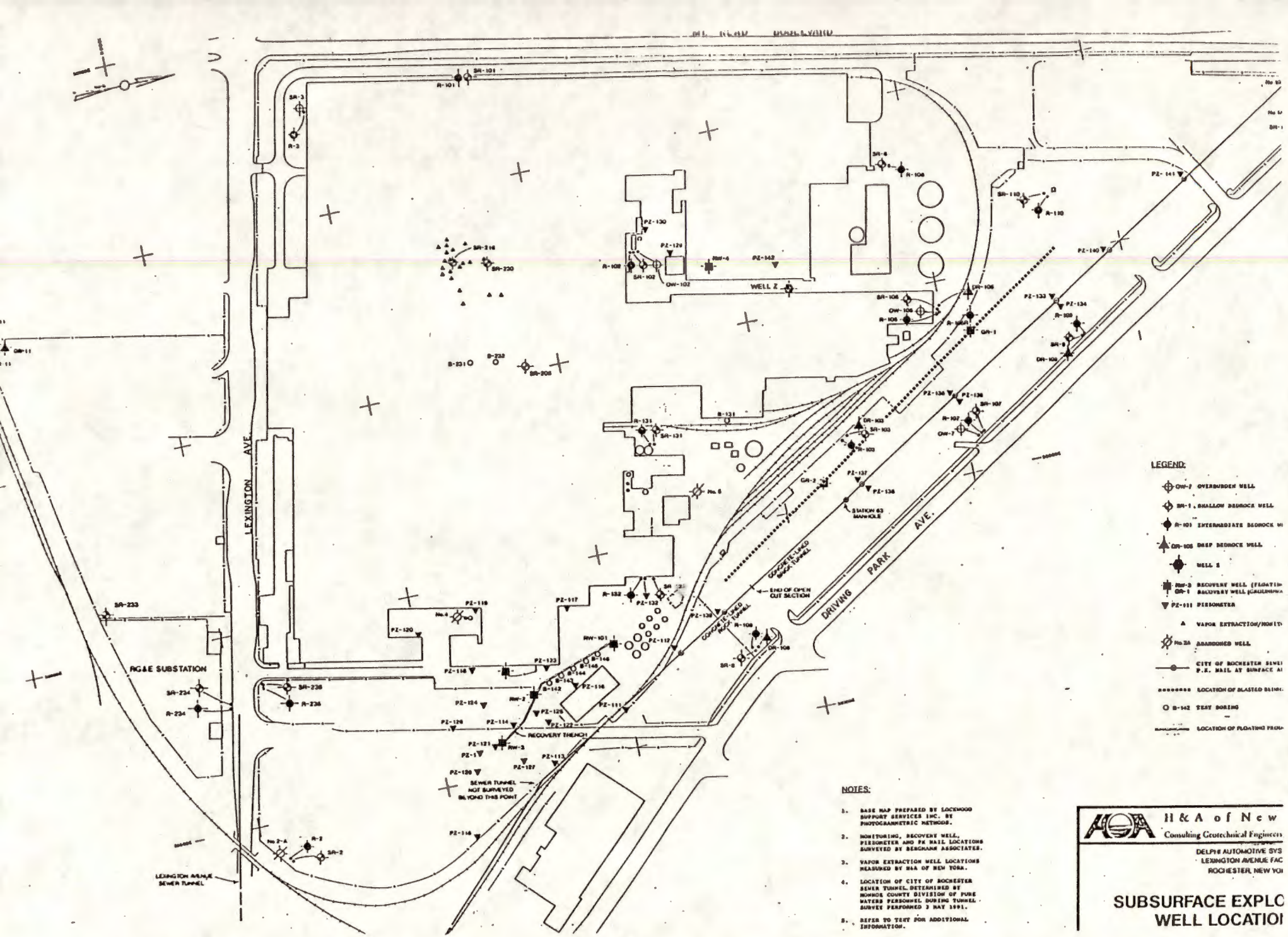
Also in 1988, as the facility was removing underground storage tanks, it became obvious that a significant layer of floating petroleum product existed on the groundwater in the northeast quadrant of the property. H & A's investigation was expanded to encompass this new concern. Recovery of floating product began with passive skimming in 1989. Approximately 40,000 gallons of petroleum was recovered by this method. Beginning in early 1995, groundwater suppression has been used to enhance oil recovery.

In 1990, an excavation to repair a sanitary sewer under the plant floor revealed soil contamination near a trichloroethylene degreaser. Delphi-E reported the release, and DEC responded by directing Delphi-E to perform an investigation to determine the extent of the problem. A soil vapor survey identified six study areas where soils contained significant levels of degreasing solvent vapors. Soil vapor extraction well have been installed in two of these areas. Equipment will be installed by the end of 1995 to begin remediation of the most heavily contaminated of the two former degreaser areas.

A layer of floating oil appeared in an intermediate bedrock monitoring well located in the southeast corner of the Delphi-E site. This well is believed to be upgradient of the plant, so it is believed the source is off-site. The oil was subsequently shown to contain PCBs. At DEC's request, all other monitoring well on site which contained floating oil were analyzed for PCBs. One additional well showed PCB contamination. This second well is located in the middle of the site, and the PCBs appear to be from an unknown local source. The PCBs have migrated into a layer of stoddard solvent from a previously identified source. Passive skimming of this stoddard solvent began in late 1994.

TOTAL VOC CONCENTRATIONS VS. TIME
FENCELINE WELL R-108




LEXINGTON AVE.
DRIVING PARK AVE.
WELL 2
RG&E SUBSTATION
LEXINGTON AVENUE SEWER TUNNEL
RECOVERY TRENCH
SEWER TUNNEL NOT SURVEYED BEYOND THIS POINT
CONCRETE-LINED MUCK TUNNEL
END OF OPEN CUT SECTION
STATION 63 MANHOLE
LEGEND:
OW-? OVERBURDEN WELL
SR-1 SHALLOW BEDROCK WELL
R-101 INTERMEDIATE BEDROCK WELL
DR-105 DEEP BEDROCK WELL
WELL 2
RW-2 RECOVERY WELL (FLOATING)
GR-1 RECOVERY WELL (GASOLINE)
PZ-111 PIEZOMETER
VAPOR EXTRACTION/MONITOR
No.2A ABANDONED WELL
CITY OF ROCHESTER SEWER P.K. NAIL AT SURFACE
LOCATION OF BLASTED BEDROCK
B-142 TEST BORING
LOCATION OF FLOATING PRODUCT
NOTES:
1. BASE MAP PREPARED BY LOCKWOOD SUPPORT SERVICES INC. BY PHOTOGRAMMETRIC METHODS.
2. MONITORING, RECOVERY WELL, PIEZOMETER AND PK NAIL LOCATIONS SURVEYED BY BERGMANN ASSOCIATES.
3. VAPOR EXTRACTION WELL LOCATIONS MEASURED BY H&A OF NEW YORK.
4. LOCATION OF CITY OF ROCHESTER SEWER TUNNEL DETERMINED BY MONROE COUNTY DIVISION OF PURE WATERS PERSONNEL DURING TUNNEL SURVEY PERFORMED 2 MAY 1991.
5. REFER TO TEXT FOR ADDITIONAL INFORMATION.
H&A of New
Consulting Geotechnical Engineers
DELPHI AUTOMOTIVE SYS
LEXINGTON AVENUE FAC
ROCHESTER, NEW YO
SUBSURFACE EXPLO
WELL LOCATIO

HYDROGEOLOGIC INVESTIGATION
MIGRATION CONTROL PROJECT
AC ROCHESTER LEXINGTON AVENUE FACILITY
ROCHESTER, NEW YORK

by

H&A of New York
Rochester, New York

for

General Motors Corporation
AC Rochester Division
Rochester, New York

File No. 70014-43
May 1993

EXECUTIVE SUMMARY

H&A of New York (H&A) performed a study of hydrogeologic response to the installation and operation of a groundwater migration-control system at the General Motors Corporation, AC Rochester Division facility located at 1000 Lexington Avenue in Rochester, New York. The study was performed during the April 1992 to February 1993 time period.

Previous studies performed by H&A and others had identified groundwater contamination in near-surface aquifer units at the site. H&A's studies indicated the source of the groundwater contamination was degreasing operations formerly conducted within the facility. Contaminants identified included chlorinated organic solvent compounds and related breakdown products. Contaminants were detected in groundwater from wells located at the northeastern boundary of the facility property. The northeastern boundary was identified as being hydraulically downgradient of the facility.

In August 1991, H&A recommended installation of a migration-control system to reduce the potential for offsite migration of contaminated groundwater. The recommended system was installed during the period covered by this report. It includes the following components:

- A 1220-foot-long groundwater recovery zone located between facility buildings and the northeastern property line. The zone was constructed by fracturing bedrock to 25 feet below the top-of-rock along a series of blast holes.
- Two groundwater recovery wells (GR-1 and GR-2) installed in the recovery zone.
- A groundwater extraction and collection system.
- A groundwater treatment system which uses ultraviolet light and hydrogen peroxide to oxidize organic contaminants.

Results of the study performed during installation and start-up of the migration control system indicate that its continued operation will prevent off-site migration of contaminated groundwater and will effectively treat extracted groundwater. The direction of groundwater flow in near-surface water-bearing soil and bedrock units in the area north and northeast of the blasted zone is reversed by extraction of groundwater from recovery well GR-1. Pumping from GR-1 captures near-surface groundwater from beyond the northeastern facility property boundary. Concentrations of contaminants detected in groundwater from northeastern boundary wells have decreased since start-up of migration control operations. The Peroxidation Systems, Inc. (PSI) treatment system installed can provide complete destruction of chlorinated organic compounds contained in extracted groundwater.

Groundwater pumping from GR-2 is needed to fully test the extractive capacity of the migration control system. Pumping from both GR-1 and GR-2 could expedite capture of contaminated groundwater from the northeastern corner of the property. Installation of a pump at GR-2 will permit additional flexibility in system operation and will allow for continued operation during routine maintenance or pump failure at GR-1. H&A recommends the testing and operation of the groundwater extraction pump at recovery well GR-2.

II. RECOVERY ZONE INSTALLATION MONITORING

During the period of 22 April through 28 May 1992, Nothnagle Enterprises, Inc. (Nothnagle) of Scottsville, New York constructed an enhanced-permeability groundwater recovery zone at the site. Nothnagle performed this work under direct contract with AC Rochester. The work was accomplished by drilling and blasting a single line of shot holes along a 1220-foot-long alignment in the north parking lot of the facility. Construction activities were monitored by H&A personnel.

The locations of the recovery zone and other site features, including the site monitoring well network, are shown on Figure 2. The recovery zone is located north of the plant buildings and south of and roughly parallel to a Monroe County Pure Waters District sewer tunnel. At 350 feet from its northwest end, the recovery zone is 80 feet northeast of the Die-Cast building (Building 16). The distance between the recovery zone and the sewer tunnel ranges from 110 feet on the northwest end of the recovery zone to 55 feet on the southeast end. The recovery zone is located approximately 250 feet southwest of and parallel to Driving Park Avenue.

The blasting program was designed to fracture bedrock to a depth of approximately 25 feet below the top of bedrock. Previous investigations had indicated that the groundwater contaminant plume at the Lexington Avenue facility is restricted in vertical extent to the overburden and the upper 25 feet of bedrock. The upper 25 feet of bedrock includes the shallow-bedrock and intermediate-bedrock zones. The shallow- and intermediate bedrock zones consist of the Rochester Shale, which becomes less fractured and therefore less permeable with depth. Groundwater flow in the Rochester Shale is primarily through fractures.

Shot holes were drilled at stations 5 feet apart. Observations made by Nothnagle personnel of the depth at which bedrock was encountered in each shot hole have been incorporated in an updated top-of-rock contour map which is presented on Figure 3. Soil thickness observed along the blast zone ranged from 18 to 33 feet; the soil thickness observed was 23 feet or less at most locations.

A total of 30 blasting events was performed. Blasts typically involved detonation of charges set in five to ten adjacent shot holes. Each hole was loaded with 30 to 32.5 pounds of Austin Extra Gel 40-percent dynamite. Blasts were detonated in sequence using 25 millisecond delays with 10 to 17.5 pounds of explosive per delay. Additional information on blasting procedures and blast-vibration monitoring results is presented in our report of June 1992.

2-01. PRE-BLASTING GROUNDWATER LEVEL MONITORING

H&A personnel measured groundwater levels in the site monitoring well network on 20 and 21 April 1992. This was done to establish benchmark hydrogeologic conditions prior to the initiation of blasting activities. Water levels were measured using hand-held electronic water-level indicators.

III. RECOVERY WELL INSTALLATIONS

Recovery wells GR-1 and GR-2 were installed by Nothnagle Drilling of Scottsville, New York during the period of 19 to 28 May 1992. They were installed within the recovery zone at locations 300 and 860 feet from its northwest end. Well borings were advanced using a Redrill SK-35 air-rotary drilling rig. Borings were advanced to the base of the blasted bedrock zone. Both wells were completed with 25-foot lengths of 8-inch inside-diameter, type 304 stainless-steel, 0.020-inch-slot wellscreen installed to the bottom of the blasted section. Wellscreens were attached to 8-inch diameter, type 304 stainless-steel risers. Monitoring well installations were observed by H&A personnel.

Concrete vaults were later installed around each well head by AC Rochester. Vault cover locations and elevations were surveyed by Bergmann Associates of Rochester, New York.

3-01. RECOVERY WELL GR-1

Recovery well GR-1 was installed on 19 May 1992 at blast station 3+00, 300 feet from the northwest and of the recovery zone. A 13-inch-diameter tri-cone air-rotary drilling bit was advanced from ground surface to the top of weathered bedrock approximately 24 feet below grade, and a 12-inch nominal-diameter steel casing was installed to the bottom of the borehole. An 11-inch-diameter tri-cone bit was then advanced to 51 feet below grade. Approximately 2700 gallons of water were purged by airlifting from the open borehole prior to installation of the wellscreen and riser. The bottom of the well screen was placed 50 feet below grade. A sand pack of Morie #3 W.G. filter sand was installed from 51 to 22.8 feet below grade. Bentonite pellets were installed at the top of the sand-pack. An additional 1000 gallons of water was air-lifted from the well. The annulus between the outer casing and 8-inch riser was then filled to ground surface with bentonite-cement grout.

Water purged by air-lifting from the GR-1 boring and completed recovery well was collected by vacuum truck and transported to the AC Rochester waste-water treatment plant.

On 20 May 1992, Nothnagle installed a Grundfos Model 40S10-3 submersible stainless-steel pump (rated at 40-gpm-capacity) at 47 feet below grade in GR-1. The pump was connected by 2-inch plastic hose to header-system piping which had been installed earlier by AC Rochester. The plastic hose was equipped with a shut-off valve and a totalizing flow-meter. The flow-meter was a 1-1/2-inch diameter Sensus (Rockwell) Model RKM85-2709.

The header system directed discharge water into ACR Treatment Plant Day Tank No. 3 for subsequent treatment in the PSI pilot-test unit installed inside the treatment plant. Pumping from GR-1 was initiated on 20 May 1992, and was continued through mid-September 1992. Initial pumping operations are described in Section IV.

Pumping operations were suspended intermittently during August and September 1992 as necessary to accommodate construction activities. Piping and electrical service were brought to the well head and a concrete well vault was installed. AC Rochester terminated temporary pumping operations and removed the 40-gpm-capacity Grundfos pump in September 1992. A Grundfos model 80S30-3 submersible stainless-steel pump was installed in September 1992. Pumping and treatment operations were resumed on 22 September 1992.

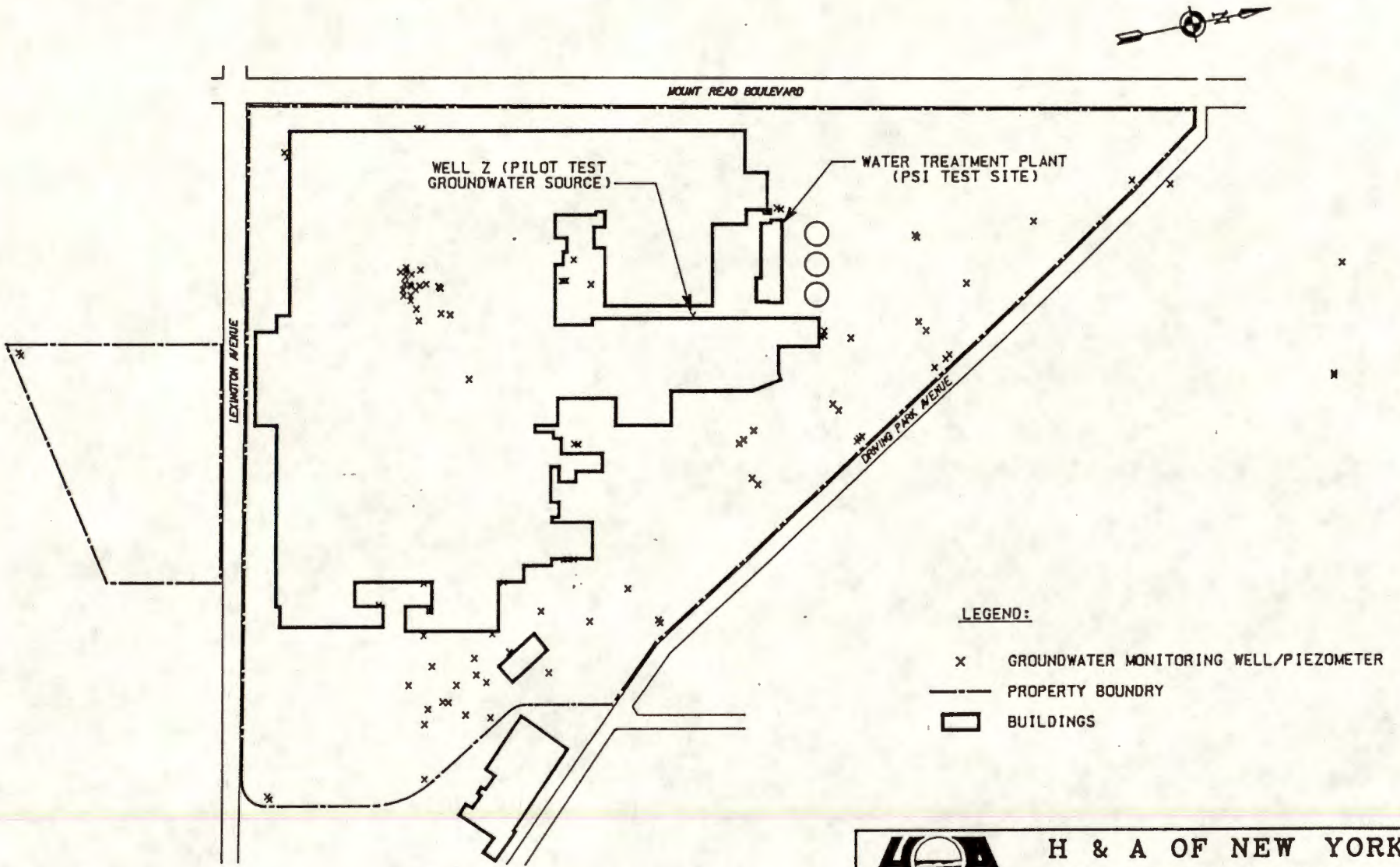
A recovery well completion report for GR-1 is presented in Appendix B. The report reflects the changes in casing lengths and ground-surface features effected during installation of the well vault.

3-02. RECOVERY WELL GR-2

GR-2 was installed by Nothnagle on 28 May 1992, at blast station 8+60. Top of bedrock was encountered at 23 feet below grade, and the well boring was advanced to 52 feet below grade. The bottom of the well screen was installed at 49.1 feet below grade. Well construction and purging activities were performed by Nothnagle as described for GR-1.

Groundwater collection system piping, electrical service, and a well vault were installed at GR-2 by AC Rochester in August and September 1992. A recovery well completion report is presented in Appendix B. A Grundfos Model 80S30-3 pump was installed in GR-2 in April 1993 and start-up is planned for May 1993.

FILE NO. 70014-45



H & A OF NEW YORK
Geotechnical Engineers & Environmental Consultants

AC ROCHESTER DIVISION
GENERAL MOTORS CORPORATION
LEXINGTON AVENUE FACILITY
ROCHESTER, NEW YORK

SITE PLAN

SCALE: 1" = 300'

FEBRUARY 1992

FIGURE 2

NB

AC ROCHESTER
LEXINGTON AVENUE PLANT
GROUND WATER TREATMENT

1995

MONTH	PREVIOUS READING	CURRENT READING	MONTHLY TOTAL
JANUARY	40038070	41264140	1226070
FEBRUARY	41264140	42296710	1032570
MARCH	42296710	43719560	1422850
APRIL	43719560	44825790	1106230
MAY	44825790	45691830	866040
JUNE	45691830	46919530	1227700
JULY	46919530	47802120	882590
AUGUST	47802120	49165000	1362880
SEPTEMBER	49165000	50404360	1239360
OCTOBER			
NOVEMBER			
DECEMBER			
		TOTAL GALLONS YTD	9126930

APPROVED:

AC ROCHESTER
LEXINGTON AVENUE PLANT
GROUND WATER TREATMENT

1994

MONTH	PREVIOUS READING	CURRENT READING	MONTHLY TOTAL
JANUARY	19936640	21649490	1712850
FEBRUARY	21649490	23450360	1800870
MARCH	23450360	25166110	1715750
APRIL	25166110	27949950	2783840
MAY	27949950	29812260	1862330
JUNE	29812280	31615330	1803050
JULY	31615330	33309110	1693780
AUGUST	33309110	35208830	1899720
SEPTEMBER	35208830	36591540	1382710
OCTOBER	36591540	37408390	816850
NOVEMBER	37408390	38699680	1291290
DECEMBER	38699680	40038070	1338390
		TOTAL GALLONS YTD	20101430

APPROVED: 2-25-96

TREATED GROUNDWATER EFFLUENT

DATE	VINYL CHLORIDE	1,1-DCE	1,1-DCA	1,2-DCE	TCE	TOTAL VOLATILES*
01/12/94	BDL	BDL	BDL	BDL	BDL	BDL
02/15/94	BDL	BDL	BDL	BDL	BDL	BDL
03/09/94	BDL	BDL	BDL	0.012	BDL	0.012
04/05/94	BDL	BDL	BDL	0.007	BDL	0.007
05/05/94	BDL	BDL	BDL	0.008	BDL	0.008
06/09/94	BDL	BDL	BDL	BDL	BDL	BDL
07/12/94	BDL	BDL	BDL	BDL	BDL	BDL
08/03/94	BDL	BDL	0.002	BDL	BDL	0.002
09/07/94	BDL	BDL	0.002	0.012	BDL	0.014
10/03/94	BDL	BDL	0.003	0.01	BDL	0.013
11/08/94	BDL	BDL	BDL	BDL	BDL	BDL
12/06/94	BDL	BDL	0.004	0.006	BDL	0.01
1/10/95	BDL	BDL	BDL	0.005	BDL	0.005
2/15/95	BDL	BDL	0.003	0.012	BDL	0.015
3/8/95	0.01	BDL	0.003	0.051	BDL	0.064
4/4/95	BDL	BDL	0.002	0.011	BDL	0.013
5/2/95	BDL	BDL	BDL	0.005	BDL	0.005
6/13/95	BDL	BDL	0.002	0.002	BDL	0.004
7/18/95	BDL	BDL	0.003	0.014	BDL	0.017
8/2/95	BDL	BDL	0.003	0.005	BDL	0.008
9/12/95	0.008	BDL	0.002	0.032	BDL	0.042

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

TYPE OF INSPECTION:
[ ] REGISTERED BUSINESS [ ] AG-USE OBSERVATION [ ] RESTRICTED DEALER [ ] CERTIFIED APPLICATOR
[X] NON-AG OBSERVATION [ ] AG-USE COMPLAINT [ ] NON-AG USE COMPLAINT [ ] MARKET PLACE [ ] EUP

[ ] WORKER PROTECTION INSPECTION [ ] GROUNDWATER [ ] ENDANGERED SPECIES [ ] CANCELLATION/SUSPENSION

NAME OF BUSINESS: Delphi Energy & Engine Mgmt.	NAME OF PERSON CONTACTED: Dennes Grady
STREET ADDRESS: 1000 Lexington Ave	OFFICIAL POSITION: Senior Environmental Project Eng.
CITY/STATE/ZIPCODE: Rochester, NY 14692-1790	POST OFFICE ADDRESS: P.O. Box 1790
TELEPHONE NUMBER: 716-647-4767 or 647-7286	CITY/VILLAGE/TOWNSHIP:
DATE: 11/9/95 FILE NUMBER:	COUNTY:

AGENT/OWNER SIGNATURE: _____ DATE: 11/9/95

COMPLAINT: [ ] AGRICULTURAL COMPLAINT [ ] NON AGRICULTURAL COMPLAINT	COMPLAINT NUMBER:	SAMPLE NUMBERS

NAME:	STREET ADDRESS
POST OFFICE ADDRESS:	CITY/STATE/ZIPCODE
TELEPHONE NUMBER:	CITY/VILLAGE/TOWNSHIP:
DATE: COUNTY:	

COMPLAINTANT SIGNATURE: _____ DATE: _____

SPECIALIST NAME: _____ SPECIALIST NUMBER: _____ REGION: _____

FORM 44-12-27

USE/MISUSE INVESTIGATION REPORT

PROPERTY OWNER	
NAME:	ADDRESS:
TELEPHONE #:	
APPLICATOR Don Boyd	
NAME:	ADDRESS:
TELEPHONE #:	
CERTIFICATION #:	
TYPE OF BUSINESS:	CROP OR OBJECT TREATED: cooling tower
TARGET PEST: bio. microorganisms	DATE AND TIME OF APPLICATION: 10-13-95 / 10-20-95
WEATHER AT TIME OF APPLICATION (WIND, TEMP., ETC.)	

PESTICIDES

BRAND NAME	EPA REG #	CLASSIFICATION	FORMULATION	METHOD OF APPLICATION
Sodium hypochlorite				

DILUTION RATE (LABEL):

OBSERVED DILUTION RATE: maintain residual 0.2 - 0.6 ppm

TOTAL AMOUNT APPLIED: 13th 23 gls ; 14th 7 gls ; 15th 13/8 gls ; 16th 8 ; 17th 12 ; 18th 8 ; 19th 7 ; 20th 20 gls.

SIZE OF AREA TREATED: Varies on size of cooling tower. 95 gls. used

TOTAL AMOUNT OF WATER USED IN MIXTURE:

WERE THE FOLLOWING LABEL INSTRUCTIONS FOLLOWED:

YES	NO	N/A		YES	NO	N/A	
[ ]	[ ]	[ ]	TARGET PEST	[ ]	[ ]	[ ]	CROP, AREA OR OBJECT TREATED
[ ]	[ ]	[ ]	REENTRY INTERVAL	[ ]	[ ]	[ ]	METHOD OF APPLICATION
[ ]	[ ]	[ ]	CAUTIONARY LABELING	[ ]	[ ]	[ ]	RATE OF APPLICATION
[ ]	[ ]	[ ]	PREHARVEST INTERVAL	[ ]	[ ]	[ ]	DILUTION RATE
[ ]	[ ]	[ ]	CERTIFIED APPLICATOR	[ ]	[ ]	[ ]	OTHER

COMPLAINT INFORMATION:

Testing done 1 - 5 x s a week depending on temp. if level of Sodium Hypochlorite is below 0.2 - 0.6 ppm range adds in amount needed to bring it up to range. Amount varies depending on chlorine-water evaporation rate. Check chlorine levels.

pumps only put out 14 g/s. of ~~water~~ chlorine a day - but chlorine is added at a slow rate daily. will be cut off if residual is to high.