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CONSTRUCTION MONITORING REPORT FOR BRP KOLENE TANK DECOMMISSIONING

RealCo/Dunkirk Acquisition Corporation Site
Dunkirk, NY

September 10, 2002

0041-006-200

Prepared For:

RealCo, Inc.
Lake View, New York

Prepared By:



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**CONSTRUCTION MONITORING REPORT
for
KOLENE TANK DECOMMISSIONING**

RealCo/DAC Site
Dunkirk, New York

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1.0 BACKGROUND

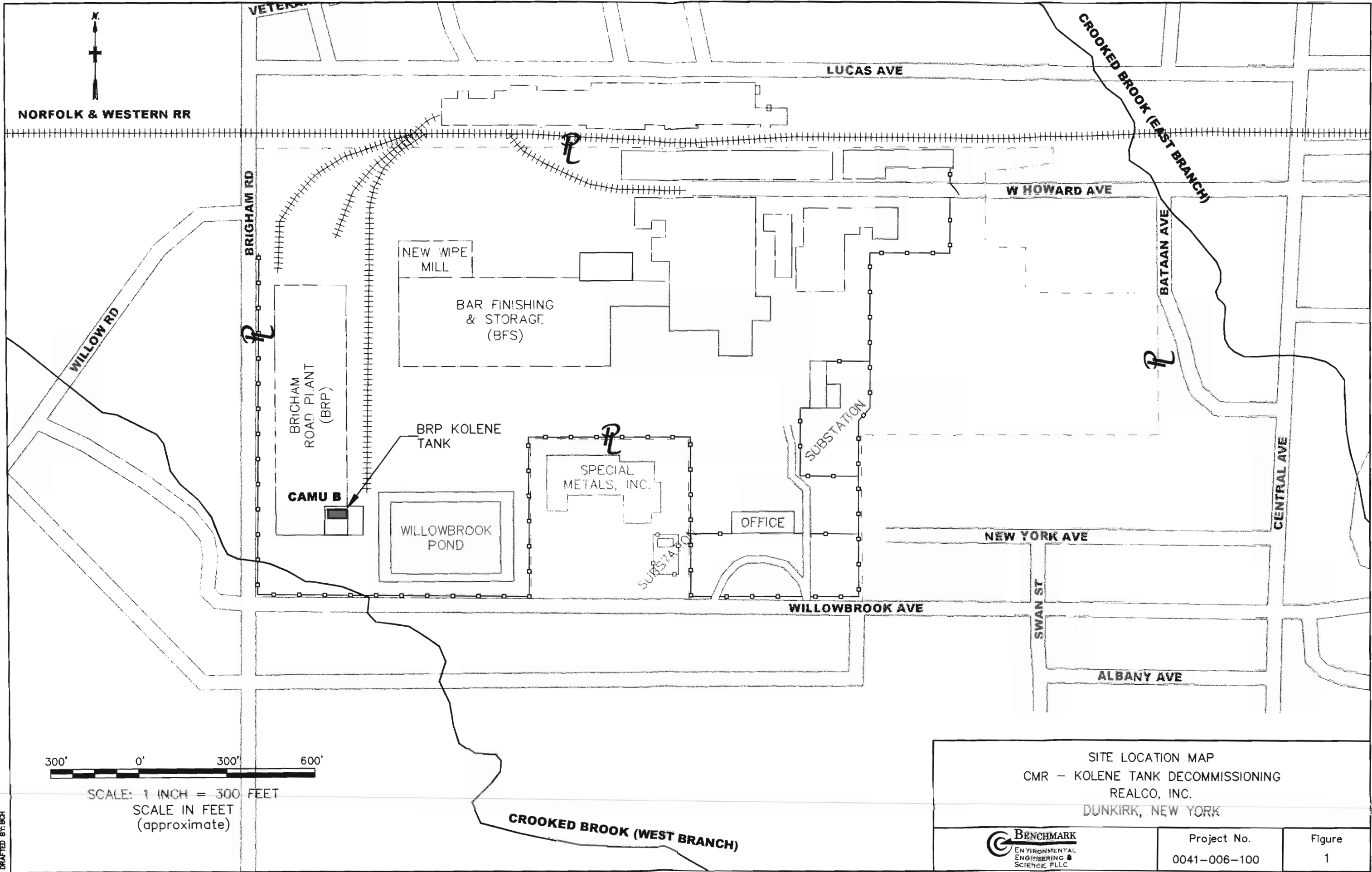
This construction monitoring report has been prepared to summarize the work performed to complete decommissioning of the former Brigham Road Plant Kolene process tank located in Dunkirk Acquisition Corporation's (DAC, formerly AL Tech) Brigham Road Plant (BRP) pickling room. The work was performed during June, July and August 2002 in accordance with the Work Plan (May 8, 2002 revision) approved by the New York State Department of Environmental Conservation (NYSDEC).

The BRP Kolene® tank contained a molten mixture of alkaline sodium and potassium hydroxides and proprietary additives for the process of de-scaling (heat treating) stainless steel products at the pickling facility. The BRP Kolene tank was taken out of service in 1991. Based on the tank volume and the specific gravity of the original Kolene material, it was estimated in the Work Plan that the tank held approximately 75 tons of solidified residues. The solidified contents of the tank and residuals deposited on the adjacent floor and surrounding equipment were initially characterized in the Work Plan as a K062 listed hazardous waste. However, based on waste profiling performed by the Environmental Contractor for the project, the waste was reclassified and manifested as a D007 characteristic waste (chromium).

The tank was located within the confines of the DAC facility (the Site) located in the southwest portion of the City of Dunkirk in Chautauqua County, New York. A site location map illustrating the facility's location and property boundaries is presented on Figure 1.

2.0 SUMMARY OF KOLENE® TANK DATA

A detailed summary of the BRP Kolene Tank construction and layout was provided in the Work Plan based on plant drawings and information from the Kolene Corporation. Based on observations and information obtained during the decommissioning activities, the summary information has been updated to document the design and construction of the tank that was dismantled during the decontamination activities.



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SITE LOCATION MAP
 CMR - KOLENE TANK DECOMMISSIONING
 REALCO, INC.
 DUNKIRK, NEW YORK



Project No.
 0041-006-100

Figure
 1

The Kolene® tank was a horizontally-positioned rectangular tank constructed of an inner and outer shell of carbon steel separated by insulation (insulating fire brick on the bottom and mineral wool blankets on the sides). The outer shell walls of the tank were fabricated from 10-gauge carbon steel, the outer steel floor of the tank was ¾-inch steel plate and the inner shell consisted of 1-inch thick carbon steel. Two thirds of the tank was open for dipping and heat treating of steel products, the remaining third was comprised of a series of steel baffled compartments that contained approximately eighteen heating tubes and three agitator tubes. The tank was located in a concrete, below-grade pit approximately 3.5 feet deep with approximately 4.5 feet of the tank rising above the main floor level at each location. The tank bottom was supported by a grid of steel I-beams welded to the ¾-inch bottom plate that rested directly on the pit's concrete floor.

Prior to initiating decommissioning activities, the Kolene® tank was observed to be completely full of solidified salt bath residuals. Residual Kolene® product was also observed to have been heavily deposited on the surrounding concrete floor, catwalk and floor pit cavities. Molten Kolene bath residuals spilled during product dragout or from tank overflows solidified within minutes of deposition outside the tank due to their melting point characteristics. Heavy residual waste deposition has occurred on adjacent steel structures (grating, exterior framework, etc.) and piping associated with the tank due to spillage from the processing and transfer of steel products. A steel skirt was positioned around the top perimeter of the tank to seal off the insulating cavity between the inner and outer tank shells. As the tank was dismantled, it was observed that this skirt was damaged in many areas and did not prevent the intrusion of Kolene salts into the interstitial cavity.

Table 1 summarizes the dimensions and materials of construction information for the BRP Kolene tank. This information was based on historical drawings obtained from AL Tech files, field measurements and discussions with the Kolene Corporation.

The actual weight of Kolene residuals (including debris deposited on the surrounding floor and pits and contaminated insulation materials) disposed of from the decommissioning

process is presented in Section 3 and was significantly higher than the weight estimated in Table 1 below.

TABLE 1 KOLENE TANK DATA		
Item Description	Brigham Rd. Plant Tank	Notes
Inner Steel Tank Dimensions	22' 6" L X 10' 8" W X 5' 4" H	From Kolene & ALTech Dwgs
Outer Steel Tank Shell Dimensions	24' 8" L X 12' 6" W X 6' 5" H	From Kolene & ALTech Dwgs
Estimated Kolene Residual Contents	143,360 lbs.	112 lbs/CF (per Kolene MSDS)
Estimated Wt. of Inner Steel Tank Shell	34,018 lbs.	1-inch thick carbon steel plate
Estimated Wt. of Outer Shell	10,707 lbs.	10 gauge carbon steel plate
Estimated Wt. of Internal Steel Tank Components	7,722 lbs.	Includes baffles, reinforcing angles, bars, etc.
Insulation Material Between Shells	Bottom- insulating brick Sides- Mineral wool	Wt. of Brick: Approx. 7,000 lbs Wt. of Blanket: Approx. 3,000 lbs.

3.0 TANK WASTE REMOVAL & DECOMMISSIONING WORK

3.1 ENVIRONMENTAL CONTRACTOR

Global Environmental Industrial (GEI) of Dunkirk, New York was selected by RealCo to perform the BRP Kolene Tank decommissioning work based on a competitive bid process and their previous experience with the decommissioning of two similar Kolene tanks at other locations and specialization in cleaning, decontamination and remediation projects involving hazardous substances and hazardous wastes.

3.2 PROJECT OVERSIGHT

RealCo and Benchmark Environmental Engineering personnel (as an authorized agent for RealCo) conducted oversight of tank decommissioning activities during all critical phases of the work. In general, Benchmark personnel were at the project site during the afternoon of each day that work was performed. Oversight activities included documenting work performed, maintaining a photo record of job progress, verifying and completing waste manifests, updating NYSDEC on the schedule and other day-to-day activities as needed. Benchmark also reviewed the final extent of residual materials cleanup after tank removal with NYSDEC prior to demobilization from the site.

3.3 SUMMARY OF DECOMMISSIONING/DECONTAMINATION ACTIVITIES

This section describes the activities and chronology of the work performed by RealCo and its environmental subcontractors for the removal and disposal of the tank contents (and residuals deposited on the surrounding floor), dismantling of the tank, decommissioning and proper disposal of impacted tank steel and ancillary tank piping and steel structures removal, final clean-up of the tank pit and adjacent areas and off-site disposal of the BRP Kolene® tank, residual contents and impacted ancillary structures.

June 21 through July 3, 2002

- GEI mobilized an excavator, equipment and roll-off containers on June 21, 2002 in preparation for initiating decommissioning work the following week. GEI cordoned off work area to restrict access to the Pickle Room area. To assess the hardness of the solidified Kolene residuals, GEI scraped the top of the Kolene solids with the teeth of the excavator bucket. The weight of the bucket immediately collapsed the crust and it was discovered that below a two to three inch thick crust, there was a large

pool of liquefied Kolene material in the main open section of the tank. GEI found that the liquefied material was approximately 3 to 4 feet deep and encompassed the majority of the process section (open) of the tank. GEI discontinued further work and called Benchmark to discuss the conditions.

- GEI contacted the TSDf (Michigan Disposal, Inc.) to ascertain if addition of an absorbent would change the original waste profile for the Kolene residuals and prevent acceptance of the material at the disposal facility. The TSDf indicated that the addition of a clay absorbent, such as “speedi-dry” would not cause a problem and the mixed material could be shipped under the original profile.
- GEI prepared a supplemental cost estimate for RealCo to estimate of the additional costs associated with adding, mixing and disposing of the clay based absorbent. The total estimated cost to mix the material and absorb all free liquid was \$9,750. This cost assumed the addition of approximately 15 tons of clay absorbent and the disposal of this added weight at the original disposal cost of \$175 per ton.
- On June 26, 2002, GEI re-mobilized and began adding clay-based absorbent into the Kolene tank. Mixing was achieved with the bucket of the excavator and after additional of 2 ½ to 3 tons of absorbent, the majority of the liquefied Kolene residuals had been solidified to a consistency of a paste and all free liquids were absorbed. This material was transferred into two lined, 20 cubic yard roll-off containers. Upon completion of roll-off filling, GEI cleaned up adjacent floors and tarped roll-offs.

- June 28, 2002 - GEI coordinated and removed two full roll-off containers containing a total of 27.42 tons for shipment to Michigan Disposal, Inc. No other work was performed.
- July 1 through July 3 - GEI used an acetylene cutting torch to remove sections of outer and inner tank walls on the west end and southwest side of tank. A backhoe equipped with a hydraulic hoe-ram attachment was then used by GEI to begin mechanically breaking apart the remaining solid Kolene residue. This material was relatively hard and progress was incremental. As the material was chipped and broken apart, it was pulled forward within the tank and stockpiled for transfer into roll-offs.
- On July 2, GEI notified Benchmark that Michigan Disposal was experiencing difficulty treating the two roll-off shipments of Kolene solids and absorbent material previously shipped off-site on June 28, 2002. Michigan Disposal indicated that they would not accept any further shipments of Kolene residuals due the additional stabilization and solidification that was required to meet land ban criteria. GEI immediately requested permission to contact and send samples of the Kolene to other potential permitted TSDFs in order to find an alternative disposal location.
- Work on the project was stopped on July 3, 2002 until a new Kolene disposal site was located and approved. RealCo agreed that further Kolene residuals transfer into roll-offs should be discontinued until a disposal solution was obtained.

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July 26 through August 20, 2002

- Subsequent to stopping work on July 3, GEI worked with various hazardous waste brokers and TSDFs to identify an alternative disposal site for the Kolene residuals. On July 18, 2002 GEI submitted the results of their inquiries and identified Permafrix of Michigan (with trans-shipment to Laidlaw in Canada for final disposal) as the most cost-effective alternative. Although the cost for transportation remained the same per ton, the cost of disposal doubled to \$350 per ton. With no other viable options available, RealCo and Benchmark agreed that GEI should resume work immediately using Permafrix as the TSDF for the remaining Kolene residues.

- GEI proceeded during the last week in July and the first weeks in August to remove all remaining Kolene solids with the hoe-ram and excavator, while cutting away internal steel baffles, heating and mixer tubes. All steel cut-out and removed from the tank was cut into pieces no larger than 3 feet in any dimension for separate disposal as a D007 hazardous waste at CWM Chemical Services in Model City, New York. Eighty (80) cubic yards (37.3 tons) of contaminated steel debris was cut up, consolidated in four roll-off containers, shipped and disposed of in this manner. A copy of the hazardous waste manifests for this material are presented in Attachment 1. Table 2 summarizes the steel debris waste shipments.

- During this period, 122.72 additional tons of Kolene residuals were removed from the tank, concrete floors and floor pit adjacent to and below the tank. This included the insulating mineral wool and brick located within the annular space between the inner and outer tank walls and floors. All of the insulating material was heavily impacted by the

TABLE 2
REALCO, INC.
CONSTRUCTION MONITORING REPORT
BRP KOLENE TANK DECOMMISSIONING PROJECT

SUMMARY OF WASTE SHIPMENTS

SHIPMENT NUMBER	MANIFEST NO.	DATE	WEIGHT (TONS)	DISPOSAL FACILITY
<u>KOLENE RESIDUALS</u>				
1	MI 8627190	6/28/2002	13.6	Michigan Disposal, Inc.
2	MI 8627191	6/28/2002	13.82	Michigan Disposal, Inc.
3	MI 8627264	7/24/2002	17.81	Perma-Fix of Michigan, Inc. ⁽¹⁾
4	MI 8627267	7/30/2002	17.56	Perma-Fix of Michigan, Inc. ⁽¹⁾
5	MI 8627266	8/5/2002	18.1	Perma-Fix of Michigan, Inc. ⁽¹⁾
6	MI 8627268	8/7/2002	17.8	Perma-Fix of Michigan, Inc. ⁽¹⁾
7	MI 8627300	8/12/2002	16.55	Perma-Fix of Michigan, Inc. ⁽¹⁾
8	MI 8627301	8/14/2002	16.54	Perma-Fix of Michigan, Inc. ⁽¹⁾
9	MI 8627312	8/20/2002	18.36	Perma-Fix of Michigan, Inc. ⁽¹⁾
TOTAL WEIGHT KOLENE RESIDUALS:			150.14	
<u>STEEL TANK DEBRIS</u>				
1	NYG 3217365	8/8/2002	13.03	CWM Chemical Services, Inc.
2	NYG 3217329	8/12/2002	8.7	CWM Chemical Services, Inc.
3	NYG 3217356	8/15/2002	8.55	CWM Chemical Services, Inc.
4	NYG 3217734	8/19/2002	7.02	CWM Chemical Services, Inc.
TOTAL WEIGHT STEEL DEBRIS:			37.3	

(1) Material was then trans-shipped to final disposal site in Ontario, Canada (Laidlaw Facility)

Kolene salts and consolidated with the Kolene residuals as hazardous waste. This material was shipped in seven (7) roll-off containers to Permafix of Michigan. A copy of all of the hazardous waste manifests for the Kolene residuals (including the first two shipments on June 28, 2002 to Michigan Disposal) are presented in Attachment 1. Table 2 summarizes the Kolene residuals waste shipments.

- After removal of all tank components and Kolene residuals from the tank pit and the adjacent floor surfaces, the concrete surfaces were manually scraped clean with shovels and swept to remove any loose material. The concrete tank pit floor was inspected and observed to be in relatively good condition with no signs of major deterioration. GEI also removed a sizable quantity of Kolene residuals and contaminated debris from the north side of the adjacent quench tank floor pit. Further cleanup of this pit would require the removal of the quench tank superstructure.

- A final inspection of the tank pit and surrounding area was conducted with the NYSDEC on August 16, 2002. GEI was completing final clean-up of the main floor and planning on removal of the final roll-off containers the following week. It was agreed that the decommissioning and clean-up of the Kolene tank and associated residuals had been accomplished in accordance with the approved Work Plan and no further action was required by RealCo.

4.0 PHOTO DOCUMENTATION

A chronological photo summary of the project was compiled by Benchmark and is presented in Attachment 2. Due to the lighting conditions in the former Pickle Room, adjustments to photo brightness were made to identify key features of interest on the project.

5.0 PROJECT COSTS

A summary of the costs to perform the tank removal has been prepared and presented in Table 3. The total project cost is projected to be \$107,020. This total includes engineering oversight and preparation of the Construction Monitoring Report and assumes that the project is tax exempt under New York State tax regulations.

6.0 DECLARATIONS/LIMITATIONS

Benchmark personnel observed the clean-up activities associated with the BRP Kolene Tank Decommissioning Project according to generally accepted engineering practices. Based on the field observations made by Benchmark personnel, the clean-up activities performed at the Site complied with the NYSDEC approved Work Plan prepared for RealCo by Benchmark.

This construction monitoring report has been prepared for the exclusive use of RealCo. The contents of this report are limited to information available at the time of the construction activities and to data referenced herein, and assume all referenced historic information sources to be true and accurate. The findings herein may be relied upon only at the discretion of RealCo. Use of or reliance upon this report or its findings by any other person or entity is prohibited without written permission of Benchmark Environmental Engineering & Science, PLLC.

TABLE 3
REALCO, INC
CONSTRUCTION MONITORING REPORT
BRP KOLENE TANK DECOMMISSIONING PROJECT

SUMMARY OF TANK WASTE REMOVAL/DECOMMISSIONING COSTS

Item Description	Unit	Quantity	Unit Price	Total Estimated	Comments
1.) Labor & Materials to Perform Kolene Waste and Tank Removal	LS	1	\$ 18,700	\$ 18,700	
2) Kolene Waste Transportation	Load	9	\$ 1,225	\$ 11,025	Includes Loads to MDI and Permafix
3a) Disposal of Kolene Solids (Mich. Disposal)	Tons	27.42	\$ 175	\$ 4,799	Total Weight of Kolene Residuals Disposed is More Than Double Original Estimate
3b) Disposal of Kolene Solids (Permafix)	Tons	122.72	\$ 350	\$ 42,952	
3c) Michigan Haz Waste Disposal Tax	Tons	27.42	\$ 10	\$ 274	
4.) Tank Steel Debris Transport	Load	4	\$ 500	\$ 2,000	
5.) Tank Steel Debris	CY	80	\$ 130	\$ 10,400	Total Volume is Double Initial Estimate
6a) Roll-Off Rental	Days	57	\$ 10	\$ 570	
6b) Roll-off Spot Cost	Each	2	\$ 400	\$ 800	
7.) Speedi-Dry	Pallet	8	\$ 300	\$ 2,400	8 Tons of Absorbent for Solidification
8.) Standby Time	HR	11	\$ 55	\$ 605	
8.) Hazardous Waste Analytical Profile	LS	1	\$ 1,031	\$ 1,031	
SUBTOTAL:				\$ 95,556	
Engineering Oversight and Const. Monit. Rpt.	LS	1	\$ 11,464	\$ 11,464	Includes 15 days of partial/full day oversight
PROJECT TOTAL:				\$ 107,020	

Notes:

- 1.) Total assumes that project will be tax exempt and \$6,759.71 tax invoiced by GEI is not applicable.
- 2.) Total assumes that Michigan Disposal charge of \$175/ton for Kolene Residuals will be applicable.

**ATTACHMENT 1
WASTE MANIFESTS**

0041-006-200

KOLENE RESIDUALS MANIFESTS



WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF
ENVIRONMENTAL QUALITY

DO NOT WRITE IN THIS SPACE
ATT. DIS. REJ. PR.

Required under authority of Part 111 and
Part 121 of Act 451, 1994, as amended.

Failure to file may subject you to
criminal and/or civil penalties under
Sections 324.11151 or 324.12116 MCL.

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's US EPA ID No. NYR000086603	Manifest Document No. 001	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
---	---	-------------------------------------	----------------	---

3. Generator's Name and Mailing Address REALCO INC. P.O. BOX 9 LAKEVIEW, NY 14085-0009	4. Generator's Phone (716 510-6678)	A. State Manifest Document Number MI 8627190	B. State Generator's ID LUCAS AVE DUNKIRK, NY 14048
--	--	--	---

5. Transporter 1 Company Name TONAVANDA TANK TRANSPORT	6. US EPA ID Number NYD097644801	C. State Transporter's ID AC 25382 (09)	D. Transporter's Phone (716) : 873-9703
7. Transporter 2 Company Name	8. US EPA ID Number	E. State Transporter's ID	F. Transporter's Phone

9. Designated Facility Name and Site Address MICHIGAN DISPOSAL WASTE TREATMENT PLANT. 49350 N. I-94 SERVICE DRIVE BELLEVILLE, MI 48111	10. US EPA ID Number MI D000724831	G. State Facility's ID	H. Facility's Phone (734) 697-7830
--	--	------------------------	--

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER). HM	12. Containers		13. Total Quantity	14. Unit Wt/Vol	15. Waste No.
	No.	Type			
a. X RQ WASTE Environmentally hazardous substances, solid, n.o.s., (CHROMIUM) 9, UN3077, PG III	001	CM	0020	Y	D 0 0 7
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above a. 060202MMFT ERG1 171	K. Handling Codes a. T
b.	b.
c.	c.
d.	d.

15. Special Handling Instructions and Additional Information
EMERGENCY CONTACT: 716-510-6678

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 JIN PARK	Signature <i>Jin Park</i>	Date Month Day Year 06 28 02
---------------------------------------	------------------------------	---

17. Transporter 1 Acknowledgement of Receipt of Materials	Date
Printed/Typed Name DAVID ATTEA	Signature <i>David Attea</i>
	Date Month Day Year 06 28 02

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

TO THE MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY AT 1-800-242-8802 24 HOURS PER DAY.
 TO THE MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY AT 1-800-242-8802 24 HOURS PER DAY.
 TO THE MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY AT 1-800-242-8802 24 HOURS PER DAY.



WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF
ENVIRONMENTAL QUALITY

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criminal and/or civil penalties under
Sections 324.11151 or 324.12116 MCL.

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. N Y R 0 0 0 8 6 6 0 3		Manifest Document No. 002		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address REALCO INC. P.O. BOX 9 LAKEVIEW, NY 14085-0009						A. State Manifest Document Number MI 8627191							
4. Generator's Phone (716 510-6678						B. State Generator's ID LUCAS AVE DUNKIRK, NY 14048							
5. Transporter 1 Company Name TONAVANDA TANK TRANSPORT				6. US EPA ID Number N Y D 0 9 7 6 4 4 8 0 1		C. State Transporter's ID AC-25395N		D. Transporter's Phone (716) 873-9703					
7. Transporter 2 Company Name				8. US EPA ID Number		E. State Transporter's ID		F. Transporter's Phone					
9. Designated Facility Name and Site Address MICHIGAN DISPOSAL WASTE TREATMENT PLANT. 49350 N. I-94 SERVICE DRIVE BELLEVILLE, MI 48111						10. US EPA ID Number M I D 0 0 0 7 2 4 8 3 1		G. State Facility's ID					
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER). HM						12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		1. Waste No.	
a. X		RQ WASTE Environmentally hazardous substances solid, n.o.s., (CHROMIUM) 9, UN3077, PG III				0 0 1 C M		0020		Y		D 0 0 7	
b.													
c.													
d.													
J. Additional Descriptions for Materials Listed Above												K. Handling Codes	
a. 060202HMFT ERG# 171												a. T	
b.												b.	
c.												c.	
d.												d.	
15. Special Handling Instructions and Additional Information EMERGENCY CONTACT: 716-510-6678													
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 JIN PARK				Signature <i>Jin Park</i>				Date Month Day Year 06/28/02					
17. Transporter 1 Acknowledgement of Receipt of Materials												Date	
Printed/Typed Name Stepan Krupnicki				Signature <i>Stepan Krupnicki</i>				Date Month Day Year 06/28/02					
18. Transporter 2 Acknowledgement of Receipt of Materials												Date	
Printed/Typed Name				Signature				Date 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				Date Month Day Year					

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED EXCEPT WHERE SHOWN OTHERWISE. DATE 08-14-2001 BY SP-10/BJL/STP



WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF
ENVIRONMENTAL QUALITY

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Part 121 of Act 451, 1994, as amended.

Failure to file may subject you to
criminal and/or civil penalties under
Sections 324.11151 or 324.12116 MCL.

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. N Y R 0 0 0 0 8 6 6 0 3		Manifest Document No. 27264		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.		
3. Generator's Name and Mailing Address REALCO INC. P.O. BOX 9 LAKEVIEW, NY 14085-0009						A. State Manifest Document Number MI 8627264				
4. Generator's Phone (716 510-6678						B. State Generator's ID LUCAS AVE. DUNKIRK, NY 14048				
5. Transporter 1 Company Name TONAWANDA TANK TRANSPORT				6. US EPA ID Number N Y D 0 9 7 6 4 4 8 0 1		C. State Transporter's ID AC 25387NY				
7. Transporter 2 Company Name				8. US EPA ID Number		D. Transporter's Phone (716) 873-9703				
9. Designated Facility Name and Site Address PERMA-FIX OF MICHIGAN, INC. 18550 ALLEN ROAD BROWNSTOWN, MI 48192						E. State Transporter's ID				
10. US EPA ID Number M I D 0 9 6 9 6 3 1 9 4						F. Transporter's Phone				
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER). HM						12. Containers No. Type		13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. X		RQ WASTE Environmentally hazardous substances solid, n.o.s., (CHROMIUM) 9. UN3077, PG III				0 0 1 C M		EST 30,000 lbs	P	D U U 7
b.										
c.										
d.										
J. Additional Descriptions for Materials Listed Above						K. Handling Codes				
a. REA60301 ERG 171						a. T				
b.						b.				
c.						c.				
d.						d.				
15. Special Handling Instructions and Additional Information EMERGENCY CONTACT: 716-856-0599										
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 WILLIAM SEIL AGENT FOR REALCO				Signature <i>William Seil</i> AGENT FOR REALCO				Date Month Day Year 07/24/02		
17. Transporter 1 Acknowledgement of Receipt of Materials										
Printed/Typed Name GARY K. SMITH				Signature <i>Gary K. Smith</i>				Date Month Day Year 07/24/02		
18. Transporter 2 Acknowledgement of Receipt of Materials										
Printed/Typed Name				Signature				Date 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				Date Month Day Year		

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 -800-424-8802 24 HOURS PER DAY.
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WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF
ENVIRONMENTAL QUALITY

DO NOT WRITE IN THIS SPACE

ATT. DIS. REJ. PR.

Required under authority of Part 111 and Part 121 of Act 451, 1994, as amended.

Failure to file may subject you to criminal and/or civil penalties under Sections 324.11151 or 324.12116 MCL.

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. N Y R 0 0 0 0 8 6 6 0 3		Manifest Document No. 27267	2. Page 1 of 1		Information in the shaded areas is not required by Federal law.		
3. Generator's Name and Mailing Address REALCO INC. P.O. BOX 9 LAKEVIEW, NY 14085-0009					A. State Manifest Document Number MI 8627267				
4. Generator's Phone (716) 510-6678					B. State Generator's ID LUCAS AVE. DUNKIRK, NY 14048				
5. Transporter 1 Company Name TONAWANDA TANK TRANSPORT			6. US EPA ID Number N Y D 0 9 7 6 4 4 8 0 1		C. State Transporter's ID AC253/30V				
7. Transporter 2 Company Name			8. US EPA ID Number		D. Transporter's Phone (716) 873-9703				
9. Designated Facility Name and Site Address PERMA-FIX OF MICHIGAN, INC. 18550 ALLEN ROAD BROWNSTOWN, MI 48192					10. US EPA ID Number M I D 0 9 6 9 6 3 1 9 4				
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER). HM					12. Containers No. Type		13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. <input checked="" type="checkbox"/> RQ WASTE Environmentally hazardous substances, solid, n.o.s., (CHROMIUM) 9 UN3077, PG III					0 0 1 C M		EST. 18	to (14)	D 0 0 7
b.									
c.									
d.									
J. Additional Descriptions for Materials Listed Above								K. Handling Codes	
a. REA60301 ERG# 171								a. I	
b.								b.	
c.								c.	
d.								d.	
15. Special Handling Instructions and Additional Information EMERGENCY CONTACT: JIN PARK (716) 510-6678									
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 PATRICK T. MARTIN (AS AUTHORIZED AGENT FOR REALCO INC.)					Signature Patrick T. Martin		Date 07/30/02		
17. Transporter 1 Acknowledgement of Receipt of Materials					Signature Matt Fritten		Date 07/30/02		
Printed/Typed Name Matt Fritten					Signature Matt Fritten		Date 07/30/02		
18. Transporter 2 Acknowledgement of Receipt of Materials					Signature		Date		
Printed/Typed Name					Signature		Date		
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		Date		

DEPARTMENT OF ENVIRONMENTAL QUALITY
 DIVISION OF SOLID WASTE AND HAZARDOUS WASTE
 1706 CANTON STREET, LANSING, MI 48209
 TELEPHONE: 313-373-3000
 TOLL FREE: 1-800-424-8802
 FAX: 313-373-3000
 HOURS: 8:00 AM TO 4:00 PM, MONDAY THROUGH FRIDAY



WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF
ENVIRONMENTAL QUALITY

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Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. N Y R 0 0 0 0 8 6 6 0 3		Manifest Document No. 27266	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address REALCO INC. P.O. BOX 9 LAKEVIEW, NY 14085-0009					A. State Manifest Document Number MI 8627266		
4. Generator's Phone (716 510-6678					B. State Generator's ID LUCAS AVE. DUNKIRK, NY 14048		
5. Transporter 1 Company Name TONAWANDA TANK TRANSPORT			6. US EPA ID Number N Y D 0 9 7 6 4 4 8 0 1		C. State Transporter's ID AC 2538224		
7. Transporter 2 Company Name			8. US EPA ID Number		D. Transporter's Phone (716) 873-9703		
9. Designated Facility Name and Site Address PERHA-FIX OF MICHIGAN, INC. 18550 ALLEN ROAD BROWNSTOWN, MI 48192					10. US EPA ID Number M I D 0 9 6 9 6 3 1 9 4		
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER). HM					12. Containers No.	13. Total Quantity	14. Unit Wt/Vol
a.	X	RQ WASTE Environmentally hazardous substances solid, n.o.s., (CHROMIUM) 9. UN3077, PG III			0 0 1	35 000	P
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c.							
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J. Additional Descriptions for Materials Listed Above					K. Handling Codes		
a. REA60301 ERG# 171					a. T		
b.					b.		
c.					c.		
d.					d.		
15. Special Handling Instructions and Additional Information EMERGENCY CONTACT: JIN PARK (716) 510-6678							
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 PATRICK T. MARTIN (AS AUTHORIZED AGENT FOR REALCO INC.)					Signature Patrick T. Martin		Date 08/05/02
17. Transporter 1 Acknowledgement of receipt of Materials					Date		
Printed/Typed Name PATRICK T. MARTIN JOHN KUCHEAR					Signature John Kuchar		Date 08/05/02
18. Transporter 2 Acknowledgement of Receipt of Materials					Date		
Printed/Typed Name					Signature		Date 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		Date Month Day Year

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CENTER AT 1-800-424-8802

GENERATOR
TRANSPORTER
FACILITY



WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF
ENVIRONMENTAL QUALITY

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Required under authority of Part 111 and Part 121 of Act 451, 1994, as amended.

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Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. N Y R 0 0 0 0 8 6 6 0 3		Manifest Document No. 27208		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.		
3. Generator's Name and Mailing Address REALCO INC. P.O. BOX 9 LAKEVIEW, NY 14085-0009						A. State Manifest Document Number MI 8627268				
4. Generator's Phone (716 510-6678						B. State Generator's ID LUCAS AVE. DUNKIRK, NY 14048				
5. Transporter 1 Company Name TONAWANDA TANK TRANSPORT				6. US EPA ID Number N Y D 0 9 7 6 4 4 8 0 1		C. State Transporter's ID AG 25 388 M				
7. Transporter 2 Company Name						D. Transporter's Phone (716) 873-9703				
8. US EPA ID Number						E. State Transporter's ID				
9. Designated Facility Name and Site Address PERMA-FIX OF MICHIGAN, INC. 18550 ALLEN ROAD BROWNSTOWN, MI 48192						10. US EPA ID Number M I D 0 9 6 9 6 3 1 9 4				
9. Designated Facility Name and Site Address						F. Transporter's Phone				
10. US EPA ID Number						G. State Facility's ID				
11. US DOT Description (including Proper Shipping Name, Hazard Class, and HM ID NUMBER).						12. Containers No. Type		13. Total Quantity	14. Unit Wt/Vol	15. Waste No.
a. X		RQ WASTE Environmentally hazardous substances solid, n.o.s., (CHROMIUM) 9. UN3077. PG III				0 0 1 C M		17 TFM 2040	TFM	D 0 0 7
b.										
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J. Additional Descriptions for Materials Listed Above										
a. REA60301		ERG 171				c.				K. Handling Codes
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										b.
										c.
										d.
15. Special Handling Instructions and Additional Information										
EMERGENCY CONTACT: JIN PARK (716) 510-6678										
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 PATRICK J. MARTIN (his authorized agent for REALCO INC.)						Signature Patrick J. Martin		Date 05/07/02		
17. Transporter 1 Acknowledgement of Receipt of Materials										
Printed/Typed Name Robert M...ble						Signature Robert M...		Date 08/07/02		
18. Transporter 2 Acknowledgement of Receipt of Materials										
Printed/Typed Name						Signature		Date		
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		Date		

DEPARTMENT OF ENVIRONMENTAL QUALITY
 WASTE MANAGEMENT DIVISION
 4706 AT 1-4802
 MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
 WASTE MANAGEMENT DIVISION
 4706 AT 1-4802
 MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
 WASTE MANAGEMENT DIVISION
 4706 AT 1-4802



WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF
ENVIRONMENTAL QUALITY

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Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. NYR000086603		Manifest Document No. 27300		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address REALCO INC. P.O. BOX 9 LAKEVIEW, NY 14085-0009						A. State Manifest Document Number MI 8627300							
4. Generator's Phone (716 510-6678)						B. State Generator's ID LUCAS AVE. DUNKIRK, NY 14048							
5. Transporter 1 Company Name TONAWANDA TANK TRANSPORT				6. US EPA ID Number NYD097644801		C. State Transporter's ID AC25313 (NY)							
7. Transporter 2 Company Name						D. Transporter's Phone (716) 873-9703							
9. Designated Facility Name and Site Address PERMA-FIX OF MICHIGAN, INC. 18550 ALLEN ROAD BROWNSTOWN, MI 48192						10. US EPA ID Number MI D096963194							
E. State Transporter's ID						F. Transporter's Phone							
G. State Facility's ID						H. Facility's Phone (734) 282-9250							
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER). HM						12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		I. Waste No.	
a. <input checked="" type="checkbox"/> RQ WASTE Environmentally hazardous substances, solid, n.o.s., (CHROMIUM) 9 UN3077, PG III						0 0 1 CM		0000 Y		D 0 0 7			
b.													
c.													
d.													
J. Additional Descriptions for Materials Listed Above										K. Handling Codes			
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15. Special Handling Instructions and Additional Information EMERGENCY CONTACT: JIN PARK (716) 510-6678													
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Printed/Typed Name PATRICK T. MARTIN (AS AUTHORIZED AGENT FOR REALCO INC.)										Signature <i>Patrick T. Martin</i>		Date 08/12/02	
17. Transporter 1 Acknowledgement of Receipt of Materials													
Printed/Typed Name DAVID ATTEA										Signature <i>David Attea</i>		Date 09/12/02	
18. Transporter 2 Acknowledgement of Receipt of Materials													
Printed/Typed Name										Signature		Date	
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		Date	

NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOURS PER DAY. MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY



WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF
ENVIRONMENTAL QUALITY

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Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. NYR000086603		Manifest Document No. 27301		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.		
3. Generator's Name and Mailing Address REALCO INC. P.O. BOX 9 LAKEVIEW, NY 14085-0009						A. State Manifest Document Number MI 8627301				
4. Generator's Phone (716 510-6678)						B. State Generator's ID LUCAS AVE. DUNKIRK, NY 14048				
5. Transporter 1 Company Name TONAWANDA TANK TRANSPORT				6. US EPA ID Number NYD097644801		C. State Transporter's ID AC25813(2)				
7. Transporter 2 Company Name						D. Transporter's Phone (716) 873-9703				
9. Designated Facility Name and Site Address PERMA-FIX OF MICHIGAN, INC. 18550 ALLEN ROAD BROWNSTOWN, MI 48192						10. US EPA ID Number MI D096963194				
E. State Transporter's ID						F. Transporter's Phone				
G. State Facility's ID						H. Facility's Phone (734) 282-9250				
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER). HM						12. Containers No. Type		13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. X RQ WASTE Environmentally hazardous substances, solid, n.o.s., (CHROMIUM) 9. UN3077. PG III						0 0 1 C M		0020	Y	D 0 0 7
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J. Additional Descriptions for Materials Listed Above						K. Handling Codes				
a. REA60301 ERG# 171						a. T				
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c.						c.				
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15. Special Handling Instructions and Additional Information EMERGENCY CONTACT: JIN PARK (716) 510-6678										
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 PATRICK T. MARTIN (AS AUTHORIZED AGENT FOR REALCO INC.)						Signature <i>Patrick T. Martin</i>		Date 12/14/02		
17. Transporter 1 Acknowledgement of Receipt of Materials										
Printed/Typed Name DAVID ATTEA						Signature <i>David Attea</i>		Date 12/14/02		
18. Transporter 2 Acknowledgement of Receipt of Materials										
Printed/Typed Name						Signature		Date		
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		Date		

NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOURS PER DAY. MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY



WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF
ENVIRONMENTAL QUALITY

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Part 121 of Act 451, 1994, as amended.

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criminal and/or civil penalties under
Sections 324.11151 or 324.12116 MCL.

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Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. NYR000086603		Manifest Document No. 27312		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address REALCO INC. P.O. BOX 9 LAKEVIEW, NY 14085-0009						A. State Manifest Document Number MI 8627312							
4. Generator's Phone (716 510-6678)						B. State Generator's ID LUCAS AVE. DUNKIRK, NY 14048							
5. Transporter 1 Company Name TONAWANDA TANK TRANSPORT				6. US EPA ID Number NYD097644801		C. State Transporter's ID DAC25388 (4Y)							
7. Transporter 2 Company Name						D. Transporter's Phone (716) 873-9703							
8. US EPA ID Number						E. State Transporter's ID							
9. Designated Facility Name and Site Address PERMA-FIX OF MICHIGAN, INC. 18550 ALLEN ROAD BROWNSTOWN, MI 48192						10. US EPA ID Number MI D096963194							
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER). HM						12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
a. X		RQ WASTE Environmentally hazardous substances solid, n.o.s., (CHROMIUM) 9. UN3077, PG III				0 0 1 C M		XX20		✓		D 0 0 7	
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c.													
d.													
J. Additional Descriptions for Materials Listed Above												K. Handling Codes	
a. REA60301 ERG1 171										c.		a. T	
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												c.	
												d.	
15. Special Handling Instructions and Additional Information EMERGENCY CONTACT: JIM PARK (716) 510-6678													
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Printed/Typed Name PATRICK J. MARTIN (AS AUTHORIZED AGENT FOR REALCO INC)										Signature <i>Patrick J. Martin</i>		Date 08/20/02	
17. Transporter 1 Acknowledgement of Receipt of Materials													
Printed/Typed Name DAVID ATTEA										Signature <i>David Attea</i>		Date 08/20/02	
18. Transporter 2 Acknowledgement of Receipt of Materials													
Printed/Typed Name										Signature		Date	
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		Date	

DEPARTMENT OF ENVIRONMENTAL QUALITY
 706 OAKWOOD AVENUE, LANSING, MICHIGAN 48201-1200
 TELEPHONE 313-373-3000
 TOLL FREE 1-800-424-8802
 FAX 313-373-3000
 INTERNET WWW.MICHIGANDEQ.COM

STEEL DEBRIS MANIFESTS

NYG 3217365

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



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

(Hazardous Waste Manifest 1/5/99)

Please type or print. Do not staple

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. NYR0000086603	Manifest Doc. No. 17365	2. Page 1 of 1	Information within heavy bold line is not required by Federal Law.
3. Generator's Name and Mailing Address REALCO INC. P.O. BOX 9 LAKEVIEW NY 14085-0009			A. NYG 3217365		
4. Generator's Telephone Number () 716 510-6678			B. Generator's ID LUCAS AVE. DUNKIRK, NY 14048		
5. Transporter 1 (Company Name) TONAWANDA TANK TRANSPORT		6. US EPA ID Number NYD097644801		C. State Transporter's ID ALAS35NY	
7. Transporter 2 (Company Name)		8. US EPA ID Number		D. Transporter's Telephone () (716) 873-9703	
9. Designated Facility Name and Site Address CWM CHEMICAL SERVICES, L.L.C. 1550 BALMER ROAD P.O. BOX 200 MODEL CITY NY 14107			10. US EPA ID Number NYD049836679		E. State Transporter's ID
			F. Transporter's Telephone ()		G. State Facility ID
			H. Facility Telephone () (716) 754-8231		
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)		12. Containers Number	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ Hazardous waste, solid, n.o.s. (CHROMIUM) 9, NA3077, PG III		001	CM 25000	P	EPA 1007, STATE
b.					EPA STATE
c.					EPA STATE
d.					EPA STATE
J. Additional Descriptions for Materials listed Above CV5021 MDC ERG# 171			K. Handling Codes for Wastes Listed Above		
a.			c. <input type="checkbox"/>		
b.			d. <input type="checkbox"/>		
15. Special Handling Instructions and Additional Information EMERGENCY CONTACT: 116-510-6678					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name JIN PARK		Signature <i>Jin Park</i>		Mo. Day Year 08 08 02	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name DAVID L RICH		Signature <i>David Rich</i>		Mo. Day Year 08 08 02	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Mo. Day Year	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name		Signature		Mo. Day Year	

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

GENERATOR

TRANSPORTER

FACILITY

NYG 3217329

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



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

(Hazardous Waste Manifest 1/5/99)

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UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. NYR000086603	Manifest Doc. No. 17329	2. Page 1 of 1	Information within heavy bold line is not required by Federal Law.	
3. Generator's Name and Mailing Address REALCO INC. P.O. BOX 9 LAKEVIEW NY 14085-0009 4. Generator's Telephone Number () 716 510-6678				A. NYG 3217329		
5. Transporter 1 (Company Name) TONAWANDA TANK TRANSPORT		6. US EPA ID Number NYD097644801		B. Generator's ID LUCAS AVE. DUNKIRK, NY 14048		
7. Transporter 2 (Company Name)		8. US EPA ID Number		C. State Transporter's ID NY AC 2538L		
9. Designated Facility Name and Site Address CWM CHEMICAL SERVICES, L.L.C. 1550 BALMER ROAD P.O. BOX 200 MODEL CITY NY 14107				D. Transporter's Telephone () (716) 873-9703		E. State Transporter's ID
10. US EPA ID Number NYD049836679				F. Transporter's Telephone ()		
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number) a. RQ Hazardous waste, solid, n.o.s. (CHROMIUM) 9, NA3077, PG III				12. Containers Number 001	Type CM	13. Total Quantity EST 15000
				14. Unit Wt/Vol P	I. Waste No. EPA D007, STATE	
				EPA		
				STATE		
				EPA		
				STATE		
				EPA		
				STATE		
J. Additional Descriptions for Materials listed Above CV5021 MDC ERG# 171				K. Handling Codes for Wastes Listed Above		
a				c		<input type="checkbox"/>
b				d		<input type="checkbox"/>
15. Special Handling Instructions and Additional Information EMERGENCY CONTACT: 716-510-6678						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name JIN PARK		Signature <i>Jin Park</i>		Mo. 08	Day 12	Year 2002
17. Transporter 1 Acknowledgement of Receipt of Materials						
Printed/Typed Name DAVE MARBLE		Signature <i>dm</i>		Mo. 08	Day 12	Year 2002
18. Transporter 2 Acknowledgement of Receipt of Materials						
Printed/Typed Name		Signature		Mo.	Day	Year
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name		Signature		Mo.	Day	Year

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

GENERATOR

TRANSPORTER

FACILITY

NYG 3217356

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



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

(Hazardous Waste Manifest 1/5/99)

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

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. NYR000086603	Manifest Doc. No. 19356	2. Page 1 of 1	Information within heavy bold line is not required by Federal Law.	
3. Generator's Name and Mailing Address REALCO INC. P.O. BOX 9 LAKEVIEW NY 14085-0009				A. NYG 3217356 B.. Generator's ID LUCAS AVE. DUNKIRK, NY 14048 C. State Transporter's ID RC05395 N.Y. D. Transporter's Telephone ((716) 873-9703) E. State Transporter's ID F. Transporter's Telephone () G. State Facility ID H. Facility Telephone ((716) 754-8231)		
4. Generator's Telephone Number () 716 510-6678		6. US EPA ID Number NYD097644801				
5. Transporter 1 (Company Name) TONAWANDA TANK TRANSPORT		8. US EPA ID Number				
7. Transporter 2 (Company Name)		10. US EPA ID Number NYD049836679				
9. Designated Facility Name and Site Address CWM CHEMICAL SERVICES, L.L.C. 1550 BALMER ROAD P.O. BOX 200 MODEL CITY NY 14107						
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)			12. Containers Number Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ Hazardous waste, solid, n.o.s. (CHROMIUM) 9, NA3077, PG III			001 CM	16000	P	EPA D007, STATE
b.						EPA STATE
c.						EPA STATE
d.						EPA STATE
J. Additional Descriptions for Materials listed Above CV5021 MDC ERG# 171				K. Handling Codes for Wastes Listed Above		
a.		c.		a. <input checked="" type="checkbox"/>		c. <input type="checkbox"/>
b.		d.		b. <input type="checkbox"/>		d. <input type="checkbox"/>
15. Special Handling Instructions and Additional Information EMERGENCY CONTACT: 716-510-6678						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name JIN PARK		Signature <i>Jin Park</i>		Mo. Day Year 08 15 02		
17. Transporter 1 Acknowledgement of Receipt of Materials						
Printed/Typed Name DAVID GOODEMOTE		Signature <i>David Goodemote</i>		Mo. Day Year 08 15 02		
18. Transporter 2 Acknowledgement of Receipt of Materials						
Printed/Typed Name		Signature		Mo. Day Year		
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name		Signature		Mo. Day Year		

GENERATOR

TRANSPORTER

FACILITY

NYG 3217734

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



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

Please type or print. Do not staple

(Hazardous Waste Manifest 1/5/99)

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

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. NYR000086603	Manifest Doc. No. 17734	2. Page 1 of 1	Information within heavy bold line is not required by Federal Law.		
3. Generator's Name and Mailing Address REALCO INC. P.O. BOX 9 LAKEVIEW NY 14085-0009				A. NYG 3217734			
4. Generator's Telephone Number () 716 510-6678		6. US EPA ID Number NYD097644801					B. Generator's ID LUCAS AVE. DUNKIRK, NY 14048
5. Transporter 1 (Company Name) TONAWANDA TANK TRANSPORT		8. US EPA ID Number		C. State Transporter's ID E37033(me)		D. Transporter's Telephone () (716) 873-9703	
7. Transporter 2 (Company Name)		9. Designated Facility Name and Site Address CWM CHEMICAL SERVICES, L.L.C. 1550 BALMER ROAD P.O. BOX 200 MODEL CITY NY 14107		E. State Transporter's ID		F. Transporter's Telephone ()	
9. Designated Facility Name and Site Address		10. US EPA ID Number NYD049836679		G. State Facility ID		H. Facility Telephone () (716) 754-8231	
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)			12. Containers Number	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.	
a. RQ Hazardous waste, solid, n.o.s. (CHROMIUM) 9, NA3077, PG III			001	CM	XXX20	Y	EPA 0007 , STATE
b.							EPA STATE
c.							EPA STATE
d.							EPA STATE
J. Additional Descriptions for Materials listed Above CV5021 MDC ERG# 171				K. Handling Codes for Wastes Listed Above			
a.				a. <input checked="" type="checkbox"/> T <input type="checkbox"/> c <input type="checkbox"/>			
b.				b. <input type="checkbox"/> d. <input type="checkbox"/>			
15. Special Handling Instructions and Additional Information EMERGENCY CONTACT: JIN PARK (716) 510-6678							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.							
Printed/Typed Name PATRICK T. MARTIN		Signature <i>Patrick T Martin</i>		Mo. 08	Day 19	Year 02	
17. Transporter 1 Acknowledgement of Receipt of Materials							
Printed/Typed Name DAVID ATTEA		Signature <i>David Attea</i>		Mo. 08	Day 19	Year 02	
18. Transporter 2 Acknowledgement of Receipt of Materials							
Printed/Typed Name		Signature		Mo.	Day	Year	
19. Discrepancy Indication Space							
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.							
Printed/Typed Name		Signature		Mo.	Day	Year	

ATTACHMENT 2
PROJECT PHOTOS



Photo 1. Mixing of clay absorbent w/ liquefied kolene residuals



Photo 2. East end of Kolene tank process area after removal of liquefied material



Photo 3. Solidified Kolene residuals (mixed with clay absorbent) in roll-off container



Photo 4. GEI initiating cutting of west wall of inner tank shell



Photo 5. Kolene solids stockpiled in west end of tank



Photo 6. Solidified Kolene in process portion of tank (looking east)



Photo 7. Process portion of tank - looking east after removal of west & south walls

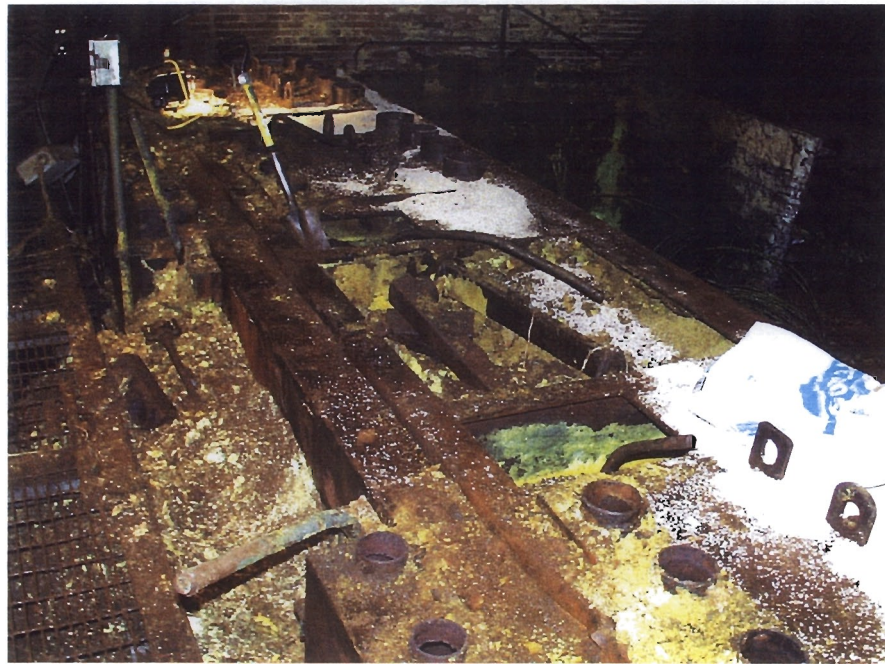


Photo 8. Heating tube & mixing compartment sections of tank prior to dismantlement



Photo 9. Mixing compartment removal



Photo 10. Kolene Residuals and ancillary materials along north side of tank



Photo 11. Insulating brick residue stockpiled for disposal



Photo 12. Contaminated steel tank components in roll-off awaiting disposal



Photo 13. Exposed tank pit looking east



Photo 14. Residuals clean-up in tank pit



Photo 15. Tank bottom support super structure



Photo 16. Tank pit looking east



Photo 17. Tank pit following final clean-out - looking east



Photo 18. Tank pit and adjacent south pit after final clean-out

