

G-29 PIT CLOSURE REPORT

**AMERICAN AXLE PLANT
NYSDEC SITE NO. 915196**

**Prepared For:
American Axle & Manufacturing, Inc.
1001 East Delavan Avenue
Buffalo, New York**

G-29 PIT CLOSURE REPORT

**AMERICAN AXLE PLANT
NYSDEC SITE NO. 915196**

**NOVEMBER 2008
REF. NO. 048428(2)**

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1.0 INTRODUCTION

This Interim Remedial Measures Report has been completed for American Axle & Manufacturing, Inc. (AAM) for closure of the G-29 Pit at the American Axle Plant Site (Site) in Buffalo, New York. The location map and Site are shown on Figures 1.1 and 1.2, respectively. The Site has been listed in the Registry of Inactive Hazardous Waste Disposal Sites in New York State as Site No. 915196. This report has been prepared in accordance with the Interim Remedial Measures (IRM) Work Plan to Address the G-29 Pit, submitted November 8, 2006, and approved by the New York State Department of Environmental Conservation (NYSDEC) on January 9, 2007.

Pit closure activities were conducted between June 30 and July 9, 2007. Subsequent on-site water treatment and waste disposal activities were conducted from July through October, 2007. This report details the activities conducted to achieve closure of the pit.

1.1 SITE LOCATION AND BACKGROUND

The G-29 Coolant System Pit is located within the American Axle Plant Site, with the Site defined as the boundaries of the source areas of PCB-impacted oil beneath the manufacturing floor slab of the AAM Facility that have been identified to date. The pit consisted of a sub-grade concrete vault located in Bay G-29 at the Site and originally constructed in 1971. The pit contained an open-top tank with two compartments, pumps, and associated piping remaining from the former coolant system. Two below-grade trenches, used to carry coolant and metal chips from two in-line transfer machines which machined ring and pinion gears, were abandoned and filled in place with crushed stone and concrete in the first quarter of 1993. The coolant system was used for another year to process chips dumped into it from other machining operations before it was also taken out of service.

The G-29 Pit was “divided” into four quadrants:

- i) the portion of the pit to the north of the tank (Quadrant 1). This quadrant contained the pit sump with pump, and coolant pumps and piping associated with the tank;
- ii) the screen tank on the east side of the pit (Quadrant 2);
- iii) the portion of the pit to the south of the tank (Quadrant 3). This quadrant was originally empty space, but contained residual debris from the old drag-out conveyor system from when it was removed; and

- iv) the clean tank compartment on the west side of the pit (Quadrant 4).

The G-29 Pit layout is shown on Figure 1.3.

1.2 PROJECT TEAM

National Vacuum Corporation (NVC) was selected by AAM to complete the removal and cleaning activities under supervision of Conestoga-Rovers & Associates (CRA) personnel. Waste disposal services were provided by Chemical Waste Management (CWM) Chemical Services, LLC for land disposal of solid materials (scrap steel and piping) and Veolia Environmental Services (Veolia) for disposal by incineration of drums of oily waste, sludges, and other aqueous/solid wastes.

2.0 WASTE REMOVAL AND CLEANING

CRA commenced waste removal activities on June 27, 2007 with skimming of the oil from the top of the pit. Recovered oil and sorbent materials were drummed for disposal by incineration.

NVC began operations on June 30, 2007. Barricades were placed on the plant floor along the main aisle at the east edge of the pit as a safety measure to prevent potential falls. The steel plates covering the pit were removed as needed to allow access to the pit for equipment, ventilation, and waste removal, while the remaining plates were left in place as a safety measure. Ultimately, all the plates were removed at the end of the project and disposed of off-site. Plastic sheeting was hung around the pit to contain overspray during cleaning activities. Temporary ductwork was hung and vented through the overhead roof windows to allow for fresh air and ventilation of smoke from the pit during torch-cutting activities.

The initial step in pit closure was removal of the aqueous phase of liquids. Sorbent materials were used to the extent practicable to isolate oil within the pit and allow for removal of the aqueous phase. Water was vacuumed from the pit using a vacuum truck. The vacuum truck off-loaded the recovered water to a fractionation (frac) tank staged on the equipment cleaning pad south of the powerhouse. Water was filtered through oil-absorbing bag filters during transfer to the frac tank. Water treatment activities will be discussed further in Section 4.0 of this report. NVC's vacuum truck was wipe-cleaned and wipe-tested in accordance with 40 CFR Part 761.79 prior to removal from the Site.

NVC personnel began to remove metal chips and debris from the pit as the water level within the pit was brought down. Materials were manually shoveled and placed in drums for later disposal. Sorbent materials used to isolate the oil within the pit were also handled in this manner.

As chips and oily debris were removed, NVC personnel began a gross cleaning of the scrap steel equipment in preparation for torch cutting. The steel tanks and remnants of the conveyor system, pumps, and piping were then cut into manageable pieces and lifted from the pit using a crane. Steel pieces were wrapped in plastic and placed in a roll-off box for disposal as hazardous debris. The one exception was the stainless steel screen and plate that formed the bottom of the tank. This material was left within the pit as discussed in Section 2.1 below.

Upon removal of liquid, metal chips, and equipment from the pit, the pit was power washed to remove gross contamination from the walls. Although the IRM Work Plan

called for leaving the pit open for future evaluation upon completion of the waste removal and double wash/rinse cleaning activities, as discussed in Section 2.1 and with the concurrence of the NYSDEC, it was ultimately decided that the preferred method of closure was to fill and cap the pit. Consequently, rather than completing the double wash/rinse procedure as described in 40 CFR Part 761.375, only a gross cleaning of the concrete pit surfaces was completed.

Chip samples of the concrete sidewalls were collected on July 6, 2007 and analyzed for total PCBs via USEPA Method 8082. Figure 2.1 shows the approximate locations of the chip samples. All samples were collected at about 4 to 4.5 feet above the floor, the approximate liquid level within the pit. Sample results are summarized on Table 2.1. Of the six concrete samples collected, all but one were below the subsurface soil standard of 10 mg/kg as specified in NYSDEC Technical and Administrative Guidance Memorandum (TAGM) HWR 94-4046. PCBs were detected in the sample collected from the northern section of the east wall at a concentration of 503 mg/kg total PCBs. The pit was observed to be in good structural condition and without cracks. No seepage of groundwater into the pit was observed. Likewise, it is not expected that residual PCBs in concrete within the pit would impact groundwater.

Work activities associated with waste removal and cleaning were completed continually over two shifts per day from June 30, 2007 until completion the morning of July 7, 2007, when filling of the pit commenced. Photographs of various stages of the work are provided as Appendix A.

2.1 DEVIATIONS FROM THE WORK PLAN

The IRM Work Plan called for leaving the pit open upon completion of the removal/cleaning activities for future evaluation; however, due to the location of the pit at the end of the main axle assembly line and adjacent to the heavily-traveled center plant aisle, plant production management expressed safety concerns with this approach. It was decided that the best course of action would be to fill and cap the pit upon completion of waste removal/cleaning activities. This request was conveyed to J. Walia of NYSDEC by K. Galanti of CRA via electronic mail on June 27, 2007 and subsequently approved by J. Walia. Because the pit would be filled and capped, there was no need to clean, wipe test, and replace the steel plates and supports covering the pit. Consequently, these items were placed in roll-off boxes for disposal.

During removal of the remaining steel equipment, NVC encountered significant difficulty cutting through the bottom plate of the tank. That portion of the tank

consisted of a stainless steel screen and plate. Removing the piece as a whole was not feasible due to the size of the plate, limited overhead clearance, and the proximity of other manufacturing equipment. A request for a second scope change was conveyed to J. Walia of NYSDEC by K. Galanti of CRA on July 6, 2007. It was proposed that the pit would be cleaned with the steel plate remaining in place and upon completion of cleaning, the steel would be wipe-tested and the pit backfilled with the steel plate in place. J. Walia approved this approach on July 6, 2007.

Two wipe samples were collected from the north and south ends of the steel plate and submitted for PCB analysis. Approximate sample locations are shown on Figure 2.1. PCBs were detected in both the north and south samples at average concentrations of 13.4 µg/wipe and 32.1 µg/wipe, respectively. Sample results are provided on Table 2.2.

Copies of the correspondence with NYSDEC on the work plan changes and the agency approval are provided as Appendix B.

3.0 PIT CLOSURE

The pit was backfilled with No. 2 stone run of crush on July 7, 2007. Stimm Construction Company of Buffalo, New York completed backfilling activities on behalf of AAM. Stone was placed in 1-foot lifts and compacted using a mechanical tamper. Backfilling was completed to within 8 inches of the plant floor to allow for placement of rebar and concrete.

Concrete finish work was completed on July 9, 2007.

4.0 WATER TREATMENT

A temporary water treatment system was set up on the concrete pad located south of the powerhouse. Approximately 9,000 gallons of water was generated during the project and stored in a frac tank for treatment.

The water treatment system consisted of one 20,000-gallon influent tank used for oil/water separation and precipitation of suspended solids through the addition of alum; a multi-media filter containing 2,400 pounds of sand filtration media for removal of oil; two bag filter housings equipped with 5-micron oil-absorbing bag filters; three 55-gallon drums of granular activated carbon in series; and two 0.5-micron cartridge filters for removal of small particulates. Treated water was stored in one effluent frac tank and recirculated through the system until analytical results indicated the water was non-detect for PCBs at a detection limit of 0.065 µg/L.

Water treatment activities were initiated on July 20, 2007, with the final round of treatment completed on August 29, 2007. The treatment system was operated an average of 6 hours per day during this period, and was run only in the presence of an operator. Sampling of the initial batch of treated water indicated the presence of elevated PCBs and oil and grease in the water. The water was then recirculated through the treatment system and sampled weekly until analysis indicated PCB concentrations were non-detect at a detection limit 0.065 µg/L.

Water samples were analyzed by IsleChem, LLC of Grand Island, New York for PCBs by USEPA Method 608 on a 24-hour turnaround basis. IsleChem is a New York State Department of Health (NYSDOH) ELAP-certified laboratory. The treated water sampling results are summarized on Table 4.1.

Upon achieving non-detect for PCBs at 0.065 µg/L, the treated water was discharged on September 4, 2007, to the AAM oily wastewater system for further processing through the AAM Industrial Wastewater Treatment Plant and discharge to the Buffalo Sewer Authority under AAM's existing permit with BSA.

The water treatment system was disassembled for cleaning prior to return of the components to Rain-for-Rent. The frac tanks and other associated equipment including pumps, fittings, and filter housings were cleaned with Less-Than-10® solution and wipe-sampled to ensure PCB concentrations met the reuse standard of <10 µg/100 cm² wipe sample specified in 40 CFR Part 761.79 prior to being removed from the facility.

Washwaters from the cleaning activities and water treatment residuals (i.e., solids, filtration media, and spent carbon) were containerized for disposal as discussed in Section 5.0.

5.0 WASTE DISPOSAL

Steel debris was removed from the pit, sized in accordance with disposal facility requirements as provided by CWM Chemical Services, LLC, and placed in roll-off boxes. Three roll-off boxes containing 23.84 tons of debris were shipped from the Site on July 16, 2007 for landfill disposal at CWM's facility in Model City, New York.

A total of 101 drums of PCB waste were sent to Veolia ES Technical Solutions, LLC facility in Flanders, New Jersey for storage, prior to shipment to Port Arthur, Texas for ultimate destruction by incineration. PCB wastes were classified as either:

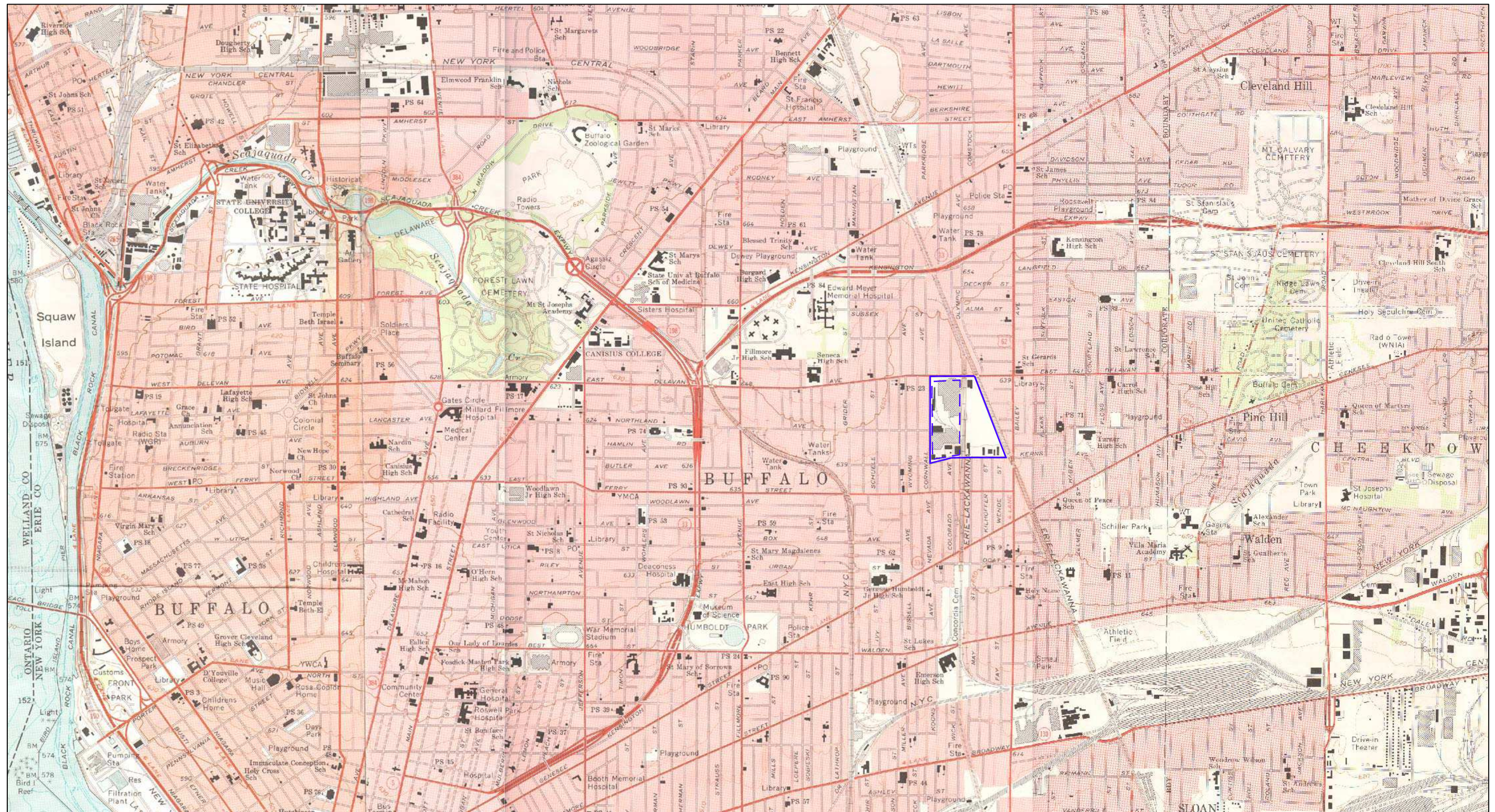
- i) oil/water mixture – consisting of oil removed from the pit and washwaters generated from cleaning of the vacuum truck and water treatment system; or
- ii) oil/water/soil mixture – consisting of oily/wet chips and debris removed from the pit, solids which settled in the treatment system frac tank, and treatment system filtration media such as sand and carbon.

Drums were shipped on three occasions: July 5, 2007; September 13, 2007; and October 12, 2007. Table 5.1 provides a summary of the waste shipments. Copies of the hazardous waste manifests, land ban paperwork, and certificates of destruction are provided in Appendix C.

6.0 SUMMARY

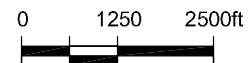
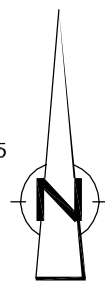
The G-29 Pit closure has been completed in accordance with the approved work plan and subsequent approved modifications.

FIGURES



REFERENCE:

UNITED STATES GEOLOGIC SURVEY
 BUFFALO NE QUADRANGLE, NY
 TOPOGRAPHIC, 7.5 MINUTES SERIES 1965

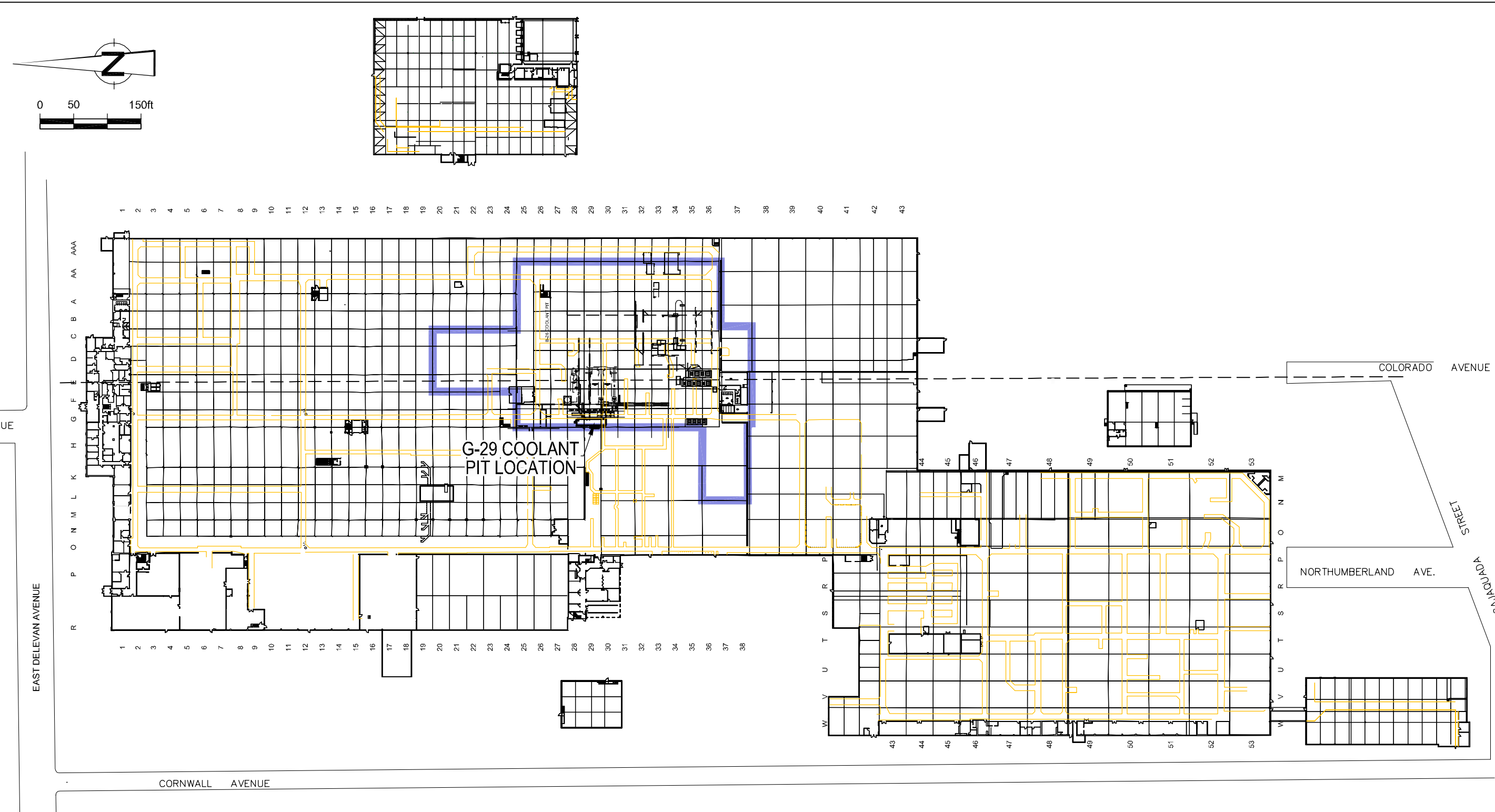


LEGEND:



PROPERTY BOUNDARY

figure 1.1
 LOCATION MAP
 AMERICAN AXLE PLANT SITE
Buffalo, New York



LEGEND
 INVESTIGATIVE SITE BOUNDARIES

figure 1.2
SITE BOUNDARY
AMERICAN AXLE PLANT SITE
Buffalo, New York

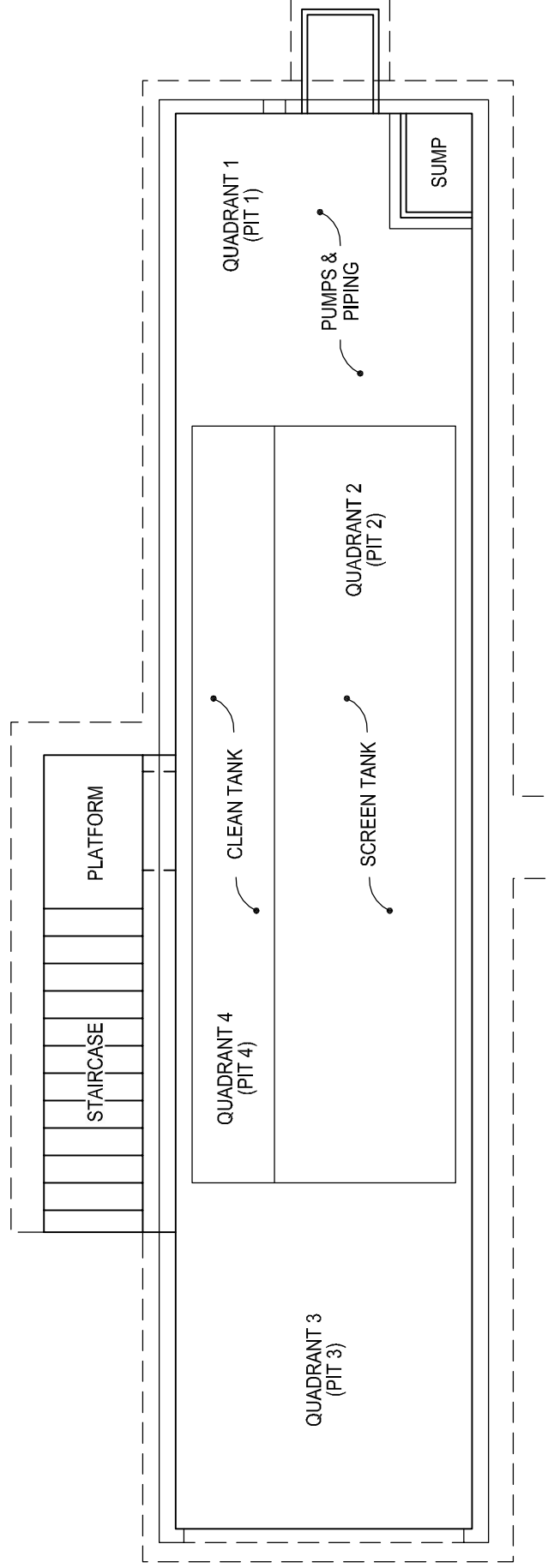
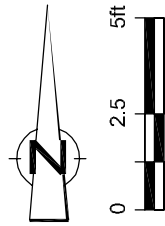
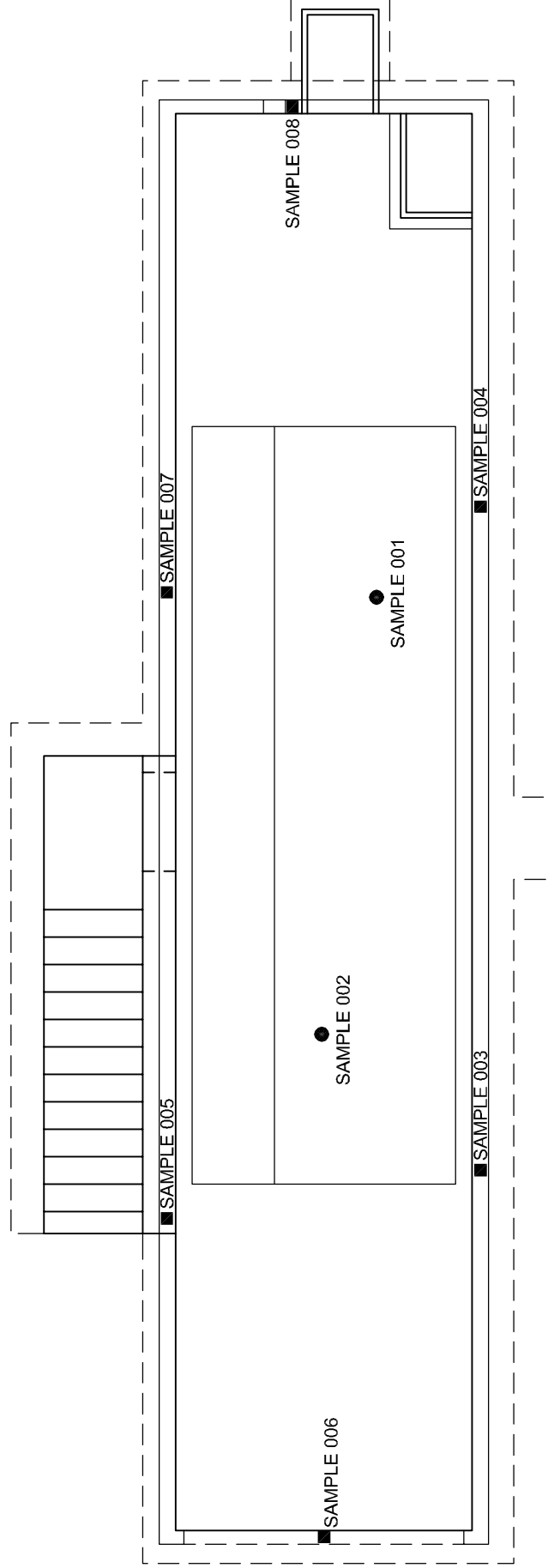
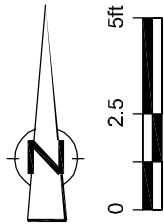


figure 1.3
G-29 LAYOUT
AMERICAN AXLE PLANT SITE
Buffalo, New York





LEGEND:

- WIPE SAMPLE
- CONCRETE CHIP SAMPLE

NOTES:

1. CONCRETE CHIP SAMPLES COLLECTED 4 TO 4.5 FEET ABOVE FLOOR LEVEL (APPROXIMATE LIQUID LEVEL).
2. SAMPLE LOCATIONS ARE APPROXIMATE

figure 2.1
SAMPLE LOCATIONS
AMERICAN AXLE PLANT SITE
Buffalo, New York



TABLES

TABLE 2.1

**ANALYTICAL RESULTS SUMMARY - CONCRETE CHIPS
AMERICAN AXLE PLANT SITE #915196
G-29 PIT CLEANING**

<i>Sample Location:</i>	<i>East Wall South</i>		<i>East Wall North</i>		<i>West Wall South</i>	<i>South Wall</i>	<i>West Wall North</i>	<i>North Wall</i>
<i>Sample ID:</i>	<i>CC-48428-070607-SM-003</i>		<i>CC-48428-070607-SM-004</i>		<i>CC-48428-070607-SM-005</i>	<i>CC-48428-070607-SM-006</i>	<i>CC-48428-070607-SM-007</i>	<i>CC-48428-070607-SM-008</i>
<i>Sample Date:</i>	<i>7/6/2007</i>		<i>7/6/2007</i>		<i>7/6/2007</i>	<i>7/6/2007</i>	<i>7/6/2007</i>	<i>7/6/2007</i>
<i>Parameters:</i>	<i>Units</i>							
<i>Polychlorinated Biphenyls</i>								
Aroclor-1016 (PCB-1016)	mg/kg	3.4 U	34 U		0.67 U	0.67 U	0.68 U	0.67 U
Aroclor-1221 (PCB-1221)	mg/kg	3.4 U	34 U		0.67 U	0.67 U	0.68 U	0.67 U
Aroclor-1232 (PCB-1232)	mg/kg	3.4 U	34 U		0.67 U	0.67 U	0.68 U	0.67 U
Aroclor-1242 (PCB-1242)	mg/kg	3.1 J	34 U		2.6	0.67 U	0.68 U	3.3
Aroclor-1248 (PCB-1248)	mg/kg	3.4 U	480		0.67 U	4.8	3.4	0.67 U
Aroclor-1254 (PCB-1254)	mg/kg	3.4 U	34 U		0.67 U	0.67 U	0.68 U	0.67 U
Aroclor-1260 (PCB-1260)	mg/kg	3.4 U	23 J		0.67 U	0.67 U	0.68 U	0.67 U

Notes:

U Not detected

J Estimated concentration

mg/kg Milligram per kilogram (part per million).

TABLE 2.2

**ANALYTICAL RESULTS SUMMARY - WIPE SAMPLES
AMERICAN AXLE PLANT SITE #915196
G-29 PIT CLEANING**

<i>Sample Location:</i>	<i>Tank Bottom North</i>	<i>Tank Bottom South</i>
<i>Sample ID:</i>	WI-48428-070607-SM-001	WI-48428-070607-SM-002
<i>Sample Date:</i>	7/6/2007	7/6/2007

<i>Parameters:</i>	<i>Units</i>		
<i>Polychlorinated Biphenyls</i>			
Aroclor-1016 (PCB-1016)	µg/wipe	0.2 U / 2.0 U	0.2 U / 4.0 U
Aroclor-1221 (PCB-1221)	µg/wipe	0.2 U / 2.0 U	0.2 U / 4.0 U
Aroclor-1232 (PCB-1232)	µg/wipe	0.2 U / 2.0 U	0.2 U / 4.0 U
Aroclor-1242 (PCB-1242)	µg/wipe	0.2 U / 2.0 U	0.2 U / 4.0 U
Aroclor-1248 (PCB-1248)	µg/wipe	12.1 / 14.6	23.7 / 40.4
Aroclor-1254 (PCB-1254)	µg/wipe	0.2 U / 2.0 U	0.2 U / 4.0 U
Aroclor-1260 (PCB-1260)	µg/wipe	0.2 U / 2.0 U	0.2 U / 4.0 U

Notes:

U Not detected

/ # Duplicate analyses

µg/wipe Micrograms per 100 cm² wipe sample.

TABLE 4.1

**ANALYTICAL RESULTS SUMMARY - TREATED WATER SAMPLES
AMERICAN AXLE PLANT SITE #915196
G-29 PIT CLEANING**

Sample Name:		W-Frac 2	W-Frac 2	W-Frac 2	W-Frac 2	W-Frac 2	W-Frac 2	W-Frac 2
Sample Date:		7/23/07	7/25/07	7/30/07	8/3/07	8/9/07	8/21/07	8/29/07
Parameters	Units							
Aroclor-1016 (PCB-1016)	µg/L	8U / 4U	-	-	6.5U / 6.5U	2U / 2U	0.065U / 0.065U	0.065 U
Aroclor-1221 (PCB-1221)	µg/L	8U / 4U	-	-	6.5U / 6.5U	2U / 2U	0.065U / 0.065U	0.065 U
Aroclor-1232 (PCB-1232)	µg/L	8U / 4U	-	-	6.5U / 6.5U	2U / 2U	0.065U / 0.065U	0.065 U
Aroclor-1242 (PCB-1242)	µg/L	8U / 4U	-	-	6.5U / 6.5U	2U / 2U	0.065U / 0.065U	0.065 U
Aroclor-1248 (PCB-1248)	µg/L	100 / 88.6	-	-	49.0 / 48.5	3.44 / 4.40	0.296 / 0.271	0.065 U
Aroclor-1254 (PCB-1254)	µg/L	8U / 4U	-	-	6.5U / 6.5U	2U / 2U	0.065U / 0.065U	0.065 U
Aroclor-1260 (PCB-1260)	µg/L	8U / 4U	-	-	6.5U / 6.5U	2U / 2U	0.065U / 0.065U	0.065 U
Total Oil and Grease (HEM)	mg/L	-	174 / 139	106 / 84.6	57.8 / 109	23.4 / 21.0	-	-

Notes:

HEM Hexane Extractable Material

U Not detected

µg/L Microgram per liter (part per billion)

mg/L Milligram per liter (part per million)

/ # Duplicate analyses.

TABLE 5.1

SUMMARY OF WASTE SHIPMENTS
AMERICAN AXLE PLANT SITE #915196
G-29 PIT CLEANING

<u>Date Shipped</u>	<u>Manifest No.</u>	<u>AAM Shipper No.</u>	<u>Container Quantity</u>	<u>Weight (kg)</u>	<u>Weight (tons)</u>	<u>Land Ban</u>	<u>Certificate of Disposal</u>	<u>Facility</u>	<u>Material</u>
7/5/2007	000022159VES		41	Est. 9160	NA	X	X	Veolia	Pit Oil/Water and Pit Solids
7/16/2007	002550614JJK	728535	1	1687	1.86	X	X	CWM	Steel Debris
7/16/2007	002550615JJK	728535	1	13,345	14.71	X	X	CWM	Steel Debris
7/16/2007	002550616JJK	728535	1	6595	7.27	X	X	CWM	Steel Debris
9/13/2007	000022499VES	728546	10	Est. 2000	NA	X	X	Veolia	Pit Washwater/Oil
9/13/2007	000022500VES	728545	36	Est. 7945	NA	X	X	Veolia	Pit Solids and Carbon Drums
10/12/2007	000072940VES	728547	14	Est. 2800	NA	X	X	Veolia	Treatment System Washwater and Filtration Media

APPENDIX A
PHOTOGRAPHS



Picture 1 - Looking southwest toward pit. Laydown area for steel debris.



Picture 2 - Looking north across pit. Crew preparing to lift steel debris.



**CONESTOGA-ROVERS
& ASSOCIATES**

285 Delaware Avenue, Suite 500
Buffalo, New York 14202
Telephone: (716) 856-2142 Fax: (716) 856-2160
www.CRAworld.com



Picture 3 – Looking north into pit. Cleaning in progress.



Picture 4 – Looking north across stainless steel screen and tank bottom.



Picture 5 – Looking south across stainless steel screen and tank bottom.



Picture 6 – Looking northeast across pit. Removal of washwaters in progress.



Picture 7 - Looking south across finished pit.



Picture 8 - Looking north across finished pit.



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& ASSOCIATES**

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www.CRAworld.com



Picture 9 – View of the water treatment system.

APPENDIX B

NYSDEC APPROVAL OF WORK PLAN MODIFICATIONS

Galanti, Katherine

From: Jaspal Walia [jswalia@gw.dec.state.ny.us]
Sent: Friday, July 06, 2007 3:07 PM
To: Galanti, Katherine
Cc: Christopher Elleman; Glenn Wygant; Mark Williams; Filing
Subject: Re: 048428: American Axle Plant Site, G-29 Pit Cleaning ScopeModification

Kathy,

Your proposal to clean the pit and the remaining steel plate, wipe test the steel plate, and backfill the pit with the steel plate in place, is acceptable. Please include a picture in the report of the steel plate left behind.

Jaspal S. Walia

>>> "Galanti, Katherine" <kgalanti@craworld.com> 7/6/2007 1:16 PM >>>
Jaspal,

As we discussed this afternoon, the contractor is having difficulty cutting through the large steel plate that made up the bottom of the tank. This portion of the tank is made of stainless steel and does not cut easily. Removing the piece whole and cutting it later outside of the pit is not an option due to the size of the piece, the limited overhead clearance, and proximity of other manufacturing equipment. What we propose is to clean the pit and the remaining steel plate, wipe test the steel plate, and backfill the pit with the steel plate in place.

Please reply to this email with your concurrence on this approach for the project file. Also, my previous email from June 27 indicated a change to the approved work plan with the pit being filled upon completion of cleaning as opposed to remaining open for observation. If you could please reply and signify your agreement on that change for the project file as well.

Let me know if you have any questions. Thank you.

Katherine B. Galanti
Project Manager
Conestoga-Rovers & Associates
268 Main Street, Suite 600
Buffalo, NY 14202
Phone: 716/856-2142 Fax: 716/856-2160
Cell Phone: 716/583-5720

.....
.....
Kathy,

The proposed modifications to the IRM Work Plan to address the G-29 Pit as outlined in this email (dated 6/27/07) are acceptable to NYSDEC.

Jaspal S. Walia

From: "Galanti, Katherine" <kgalanti@craworld.com>
To: "jaspal walia" <jswalia@gw.dec.state.ny.us>
Date: 6/27/2007 11:20:40 AM
Subject: 048428: American Axle Plant Site, G 29 Pit Cleaning

Jaspal,

Pursuant to our telephone conversation from June 25, 2007, please be advised that AAM will

implement cleaning of the G 29 pit on Saturday, June 30, 2007, in accordance with the approved Interim Remedial Measures Work Plan to address the G 29 Pit. Cleaning and equipment removal activities will be completed by National Vacuum Corporation of Niagara Falls, NY under CRA oversight. Field activities will be performed 2 shifts per day through July 8, 2007 with no work on July 4. Waste materials removed from the pit will be managed as follows:

- * oil and sludges will be drummed pending shipment to Port Arthur, Texas for incineration.

- * water within the pit will be collected and treated on site through a carbon treatment system to remove residual PCBs. Filtration media and carbon from the treatment system will be shipped to Port Arthur, Texas for incineration upon completion of the project.

- * Steel debris from the tanks, piping, and pumps will be grossly cleaned, cut to manageable sizes, wrapped, and shipped to Chemical Waste Mgmt in Model City, NY for land disposal.

Upon removal of waste materials and debris, the pit will be filled with gravel and capped with 6 8 inches of concrete consistent with the surrounding floor. Originally, AAM had considered leaving the pit open for possible reuse, however, it was determined that filling and capping the pit would be the best approach at this time consistent with continued facility operations.

The pit cleaning will occur during AAM's production shutdown to minimize impact to manufacturing operations. As such, most plant management will be off or working altered schedules. If you would like to visit the site during the cleaning activities, please contact Glenn Wygant at 818 9788 (cell phone). Glenn has requested if you could schedule your visit with him one day in advance as he will be trying to cover various days/shifts and not working a normal weekly schedule.

Let me know if you have any questions.

Katherine B. Galanti
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Buffalo, NY 14202
Phone: 716/856 2142 Fax: 716/856 2160
Cell Phone: 716/583 5720

CC: "Wygant, Glenn" <Glenn.Wygant@aam.com>, "Elleman, Christopher" <Christopher.Elleman@aam.com>, "Williams, Mark" <Mark.Williams@aam.com>,

APPENDIX C

WASTE MANIFESTS AND CERTIFICATES OF DESTRUCTION



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

Form Approved. OMB No. 2050-0035

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number NYD002127185	2. Page 1 of 1	3. Emergency Response Phone (800) 535-5053	4. Manifest Tracking Number 000022159 VES	
5. Generator's Name and Mailing Address AMERICAN AXLE & MFG. INC. PO BOX 972 BUFFALO, NY 14240-0972			Generator's Site Address (if different than mailing address) AMERICAN AXLE & MFG. INC. 1001 EAST DELAVAN AVE BUFFALO, NY 14215			
Generator's Phone: 716 891-7878 7324						
6. Transporter 1 Company Name VEOLIA ES TECHNICAL SOLUTIONS			U.S. EPA ID Number NJ D 0 8 0 6 3 1 3 6 9			
7. Transporter 2 Company Name			U.S. EPA ID Number			
8. Designated Facility Name and Site Address VEOLIA ES TECHNICAL SOLUTIONS LLC 1 EDEN LANE FLANDERS, NJ 07836			U.S. EPA ID Number NJ D 9 8 0 5 3 6 5 9 3			
Facility's Phone: 973 347-1908						
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	RO. POLYCHLORINATED BIPHENYLS, LIQUID, (PCB OIL & WATER >500 PPM PCB'S), 9, UN2315, II, (RQ=1LBS/PCB'S)	009	DM	01800	K	B PCB2 E003
X	RO. POLYCHLORINATED BIPHENYLS, LIQUID, (PCB OIL, WATER, DIRT >500 PPM PCB'S), 9, UN2315, II, (RQ=1LBS/PCB'S)	032	DM	11300	K	B PCB2 E003
3.						
4.						
14. Special Handling Instructions and Additional Information 1) ERG:171 W:510973 A:PTA510973 2) ERG:171 W:10321 A:PTABW7131 -I- ADDENDUM ATTACHED FOR ADDITIONAL TSCA INFORMATION -VEOLIA ES INFOTRAC ACCOUNT #88072 O.S.D 7/3/07 DRUM# G29-001 - G29009 & G29101 - G29132						
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.						
Generator's/Officer's Printed/Typed Name: Glenn J Wygant Month Day Year: 07 05 07						
16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: Date leaving U.S.:						
17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name: WARREN SAVAGE Signature: Month Day Year: 07 05 07 Transporter 2 Printed/Typed Name: Signature: Month Day Year:						
18. Discrepancy 18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection Manifest Reference Number:						
18b. Alternate Facility (or Generator) U.S. EPA ID Number: Facility's Phone:						
18c. Signature of Alternate Facility (or Generator) Month Day Year:						
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 1. 2. 3. 4.						
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a Printed/Typed Name: Signature: Month Day Year:						

LDR NOTIFICATION OR CERTIFICATION FORM FOR NEW YORK STATE REGULATED PCB WASTE

1) GENERATOR NAME: AMERICAN AXLE & MFG, INC
2) MANIFEST # 0000 22159 VES 3) VES APPROVAL # PTABW 7131 / PTA 50973

4) Please check all boxes that apply. NY PCB Waste Codes:

- ☐ B001: Concentrated PCB OIL ☐ B002: Oil/ Liquid 50-499 PPM PCB's
☒ B003: Oil/ Liquid 500 PPM or greater PCB's ☐ B004: Manufactured PCB Articles 50-499 ppm:
☐ transformers ☐ motors ☐ switches ☐ cable ☐ pumps ☐ pipe ☐ large capacitors ☐ bushings
☐ other (specify): _____
☐ B005: Manufactured PCB Articles (other than transformers) 500 PPM or greater:
☐ motors ☐ switches ☐ cable ☐ pumps ☐ pipe ☐ large capacitors ☐ bushings
☐ other (specify): _____
☐ B006: PCB Transformers 500 PPM or greater ☐ B007: Other PCB Wastes: ☐ soil ☐ sludge
☐ clothing ☐ rags ☐ wood ☐ other (specify): _____

5) Check ONE box as appropriate:

Certification – Waste Meets Land Disposal Treatment Standards:

☐ I am the generator of the waste as identified above, that is restricted under 6NYCRR Parts 376. I have determined that this waste meets all applicable treatment standards set forth in 6NYCRR376 and, therefore, it can be land disposed without further treatment.
Waste does not include solidified B002 material (Liquid with PCB'S 50-500 PPM).

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that waste complies with the treatment standards specified in Part 376, Section 376.4 and all applicable prohibitions set forth in subdivision 376.3(b) of Part 376 or RCRA Section 3004 (d). I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification including the possibility of a fine or imprisonment.

Notification – Waste Does Not Meet Land Disposal Treatment Standards:

☒ I am the generator of a waste restricted under 6 NYCRR Part 376 as identified above. I notify that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this notification that the waste does not comply with the treatment standards specified in 6 NYCRR Part 376.4(f). This waste must be treated to the applicable standard set forth in 6 NYCRR Part 376.4(f) prior to land disposal. (WASTE WILL BE INCINERATED)

6) SIGNATURE: [Signature]
7) TITLE: Sr. Environmental Engineer 8) DATE: 7/5/07

Note: This form is required for wastes containing 50 ppm PCB or greater. The profiled waste on the manifest number indicated above is listed hazardous waste (B-Coded) in NY State. Note: 50-500 ppm PCB drained articles and small capacitors (as defined in 40CFR761.3) are "not" regulated by NY State. Please complete items #1-8 above & send with first shipment of waste/profile



Veolia ES Technical Solutions, L.L.C.

Federal EPA ID: TXD000838896

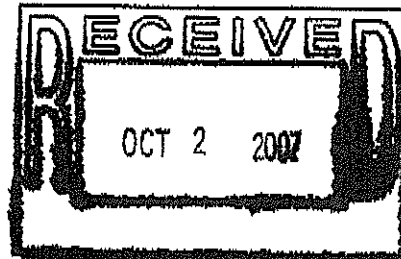
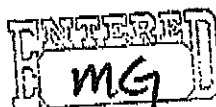
State EPA ID: 50212-001

Highway 73, 3.5 miles W. of Taylor's Bayou Bridge

Port Arthur, TX 77643

(409) 736-2821

VEOLIA ES TECHNICAL SOLUTIONS
ATTN: MANIFEST SECTION
NJD980536593
1 EDEN LN
FLANDERS, NJ 07836-8960

CERTIFICATE OF DESTRUCTION

Veolia ES Technical Solutions, L.L.C. has received waste material from VEOLIA ES TECHNICAL SOLUTIONS on 7/23/2007 as described on [State Manifest or Uniform] Hazardous Waste Manifest number 0114207VES. Veolia ES Technical Solutions, L.L.C., hereby certifies that the above described material was incinerated, and thereby destroyed, in accordance with the 40 CFR, part 761, as it pertains to the incineration of Poly-Chlorinated Biphenyl-contaminated materials.

Sequence 10

Profile Number: 510973

Veolia Tracking ID: 603471-10

American Axle & Mfg. Inc
0000 22159VES

<u>Process</u>	<u>Veolia Unit ID</u>	<u>Treatment Date</u>	<u>Generator #</u>
INCINERATION	4	9/22/2007	YL0825959000002080 ✓

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

A handwritten signature in black ink, appearing to read "Paul V. Conrad".

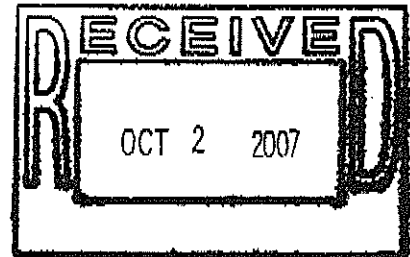
Paul V. Conrad
Material Services Manager

25-Sep-07



Veolia ES Technical Solutions, L.L.C.
Federal EPA ID: TXD000838896
State EPA ID: 50212-001
Highway 73, 3.5 miles W. of Taylor's Bayou Bridge
Port Arthur, TX 77643
(409) 736-2821

VEOLIA ES TECHNICAL SOLUTIONS
ATTN: MANIFEST SECTION
NJD980536593
1 EDEN LN
FLANDERS, NJ 07836-8950



CERTIFICATE OF DESTRUCTION

Veolia ES Technical Solutions, L.L.C. has received waste material from VEOLIA ES TECHNICAL SOLUTIONS on 7/27/2007 as described on [State Manifest or Uniform] Hazardous Waste Manifest number 0114201VES. Veolia ES Technical Solutions, L.L.C., hereby certifies that the above described material was incinerated, and thereby destroyed, in accordance with the 40 CFR, part 761, as it pertains to the incineration of Poly-Chlorinated Biphenyl contaminated materials.

Sequence 33

American Axle & Mfg Inc.
000022159VES

Profile Number: 510973

Veolia Tracking ID: 603576-33

<u>Process</u>	<u>Veolia Unit ID</u>	<u>Treatment Date</u>	<u>Generator #</u>
INCINERATION	3	9/24/2007	YL0825959000002030 ✓

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

A handwritten signature in black ink, appearing to read "Paul V. Conrad".

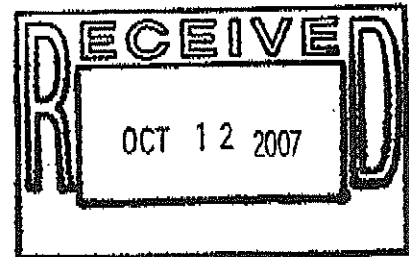
Paul V. Conrad
Material Services Manager

25-Sep-07



Veolia ES Technical Solutions, L.L.C.
Federal EPA ID: TXD000838896
State EPA ID: 50212-001
Highway 73, 3.5 miles W. of Taylor's Bayou Bridge
Port Arthur, TX 77643
(409) 736-2821

VEOLIA ES TECHNICAL SOLUTIONS
ATTN: MANIFEST SECTION
NJD980536593
1 EDEN LN
FLANDERS, NJ 07836-8950



CERTIFICATE OF DESTRUCTION

Veolia ES Technical Solutions, L.L.C. has received waste material from VEOLIA ES TECHNICAL SOLUTIONS on 7/27/2007 as described on [State Manifest or Uniform] Hazardous Waste Manifest number 0114201VES. Veolia ES Technical Solutions, L.L.C., hereby certifies that the above described material was incinerated, and thereby destroyed, in accordance with the 40 CFR, part 761, as it pertains to the incineration of Poly-Chlorinated Biphenyl contaminated materials.

Sequence 33

Profile Number: 510973

Veolia Tracking ID: 603576-33

American Axle & Mfg.
000022159VES

<u>Process</u>	<u>Veolia Unit ID</u>	<u>Treatment Date</u>	<u>Generator #</u>
INCINERATION	4	9/27/2007	YL0825959000002010 ✓
INCINERATION	5	9/27/2007	YL0825959000002020 ✓
INCINERATION	2	9/26/2007	YL0825959000002040 ✓
INCINERATION	1	9/26/2007	YL0825959000002050 ✓

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

A handwritten signature in black ink, appearing to read "Paul V. Conrad".

Paul V. Conrad
Material Services Manager

05-Oct-07



Veolia ES Technical Solutions, L.L.C.

Federal EPA ID: TXD000838896

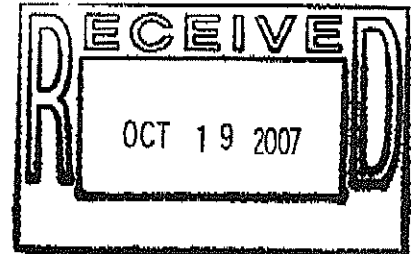
State EPA ID: 50212-001

Highway 73, 3.5 miles W. of Taylor's Bayou Bridge

Port Arthur, TX 77643

(409) 736-2821

VEOLIA ES TECHNICAL SOLUTIONS
ATTN: MANIFEST SECTION
NJD980536593
1 EDEN LN
FLANDERS, NJ 07836-8950

CERTIFICATE OF DESTRUCTION

Veolia ES Technical Solutions, L.L.C. has received waste material from VEOLIA ES TECHNICAL SOLUTIONS on 7/23/2007 as described on [State Manifest or Uniform] Hazardous Waste Manifest number 0114207VES. Veolia ES Technical Solutions, L.L.C., hereby certifies that the above described material was incinerated, and thereby destroyed, in accordance with the 40 CFR, part 761, as it pertains to the incineration of Poly-Chlorinated Biphenyl contaminated materials.

Sequence 10

Profile Number: 510973

Veolia Tracking ID: 603471-10

American Axle & Mfg.
000022159VES

<u>Process</u>	<u>Veolia Unit ID</u>	<u>Treatment Date</u>	<u>Generator #</u>
INCINERATION	1	10/13/2007	YL0825959000002060 ✓
INCINERATION	2	10/13/2007	YL0825959000002070 ✓
INCINERATION	3	10/13/2007	YL0825959000002090 ✓

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

A handwritten signature in black ink, appearing to read "Paul V. Conrad".

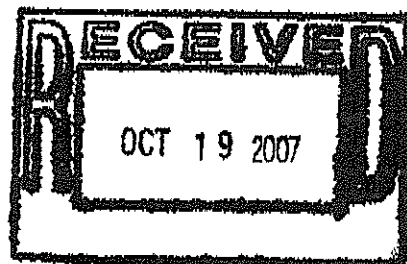
Paul V. Conrad
Material Services Manager

15-Oct-07



Veolia ES Technical Solutions, L.L.C.
Federal EPA ID: TXD000838896
State EPA ID: 50212-001
Highway 73, 3.5 miles W. of Taylor's Bayou Bridge
Port Arthur, TX 77643
(409) 736-2821

VEOLIA ES TECHNICAL SOLUTIONS
ATTN: MANIFEST SECTION
NJD980636593
1 EDEN LN
FLANDERS, NJ 07836-8950



CERTIFICATE OF DESTRUCTION

Veolia ES Technical Solutions, L.L.C. has received waste material from VEOLIA ES TECHNICAL SOLUTIONS on 7/23/2007 as described on [State Manifest or Uniform] Hazardous Waste Manifest number 0114207VES. Veolia ES Technical Solutions, L.L.C., hereby certifies that the above described material was incinerated, and thereby destroyed, in accordance with the 40 CFR, part 761, as it pertains to the incineration of Poly-Chlorinated-Biphenyl contaminated materials.

Sequence 11

Profile Number: BW7131

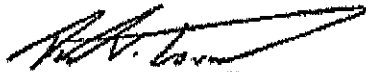
Veolia Tracking ID: 603471-11

American Axle & Mfg. INC.
00 0022159VES

<u>Process</u>	<u>Veolia Unit ID</u>	<u>Treatment Date</u>	<u>Generator #</u>
INCINERATION	32	10/11/2007	YL0825959000001010 ✓
INCINERATION	31	10/11/2007	YL0825959000001020 ✓
INCINERATION	13	10/11/2007	YL0825959000001030 ✓
INCINERATION	29	10/11/2007	YL0825959000001040 ✓
INCINERATION	1	10/11/2007	YL0825959000001050 ✓
INCINERATION	2	10/11/2007	YL0825959000001060 ✓
INCINERATION	3	10/11/2007	YL0825959000001070 ✓
INCINERATION	4	10/11/2007	YL0825959000001080 ✓
INCINERATION	30	10/11/2007	YL0825959000001090 ✓
INCINERATION	14	10/11/2007	YL0825959000001100 ✓
INCINERATION	16	10/11/2007	YL0825959000001110 ✓
INCINERATION	22	10/11/2007	YL0825959000001120 ✓
INCINERATION	23	10/11/2007	YL0825959000001130 ✓
INCINERATION	18	10/11/2007	YL0825959000001140 ✓
INCINERATION	6	10/11/2007	YL0825959000001150 ✓
INCINERATION	24	10/11/2007	YL0825959000001160 ✓
INCINERATION	19	10/11/2007	YL0825959000001170 ✓

INCINERATION	9	10/11/2007	YL0825959000001180 ✓
INCINERATION	11	10/11/2007	YL0825959000001190 ✓
INCINERATION	25	10/11/2007	YL0825959000001200 ✓
INCINERATION	15	10/11/2007	YL0825959000001210 ✓
INCINERATION	5	10/11/2007	YL0825959000001220 ✓
INCINERATION	21	10/11/2007	YL0825959000001230 ✓
INCINERATION	7	10/11/2007	YL0825959000001240 ✓
INCINERATION	8	10/11/2007	YL0825959000001250 ✓
INCINERATION	20	10/11/2007	YL0825959000001260 ✓
INCINERATION	17	10/11/2007	YL0825959000001270 ✓
INCINERATION	10	10/11/2007	YL0825959000001280 ✓
INCINERATION	12	10/11/2007	YL0825959000001290 ✓
INCINERATION	27	10/11/2007	YL0825959000001300 ✓
INCINERATION	28	10/11/2007	YL0825959000001310 ✓
INCINERATION	26	10/11/2007	YL0825959000001320 ✓

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



Paul V. Conrad
Material Services Manager

12-Oct-07

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

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number NYD002127165	2. Page 1 of 1	3. Emergency Response Phone (800) 424-9300	4. Manifest Tracking Number 002550614 JJK
5. Generator's Name and Mailing Address AMERICAN AXLE & MANUFACTURING 1001 E DELAVAN AVE BUFFALO NY 14215-3148					
Generator's Phone: (716) 891-7065					
6. Transporter 1 Company Name TOMAWANDA TANK TRANSPORT					
U.S. EPA ID Number NYD097644801					
7. Transporter 2 Company Name					
U.S. EPA ID Number					
8. Designated Facility Name and Site Address CWM CHEMICAL SERVICES, L.L.C. 1550 BALMER RD. MODEL CITY NY 14107					
Facility's Phone: (716) 754-8231					
U.S. EPA ID Number NYD049836679					
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity
			No.	Type	12. Unit Wt/Vol.
	X	1. RQ, POLYCHLORINATED BIPHENYLS, SOLID MIXTURE, 9, UN3432, III	1	CM	EST 11,000
		NY295580			K
					8007
14. Special Handling Instructions and Additional Information 1. NY285580 - SCRAP STEEL & DEBRIS CONTAMINATED WPCBS >500 PPM PCB OUT OF SERVICE DATE: 7-12-07. WEIGHT IS ESTIMATED B3029 81616107 Reel 1687K					
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.					
Generator's/Offeror's Printed/Typed Name Glenn Wygant					
Signature <i>[Signature]</i>					
Month Day Year 07 16 07					
INTL	16. International Shipments ☐ Import to U.S. ☐ Export from U.S.				
	Port of entry/exit: Date leaving U.S.:				
TRANSPORTER	17. Transporter Acknowledgment of Receipt of Materials				
	Transporter 1 Printed/Typed Name Mark Fritton				
	Signature <i>[Signature]</i>				
	Month Day Year 07 16 07				
DESIGNATED FACILITY	18. Discrepancy				
	18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection				
	18b. Alternate Facility (or Generator) Manifest Reference Number: U.S. EPA ID Number:				
	Facility's Phone:				
	18c. Signature of Alternate Facility (or Generator)				
	Month Day Year				
	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)				
	1. H132	2.	3.	4.	
	20. Designated Facility Owner or Operator Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a				
	Printed/Typed Name ELDON CARTER				
	Signature <i>[Signature]</i>				
	Month Day Year 7 16 07				

LDR NOTIFICATION OR CERTIFICATION FORM

For New York Regulated PCB Waste

This form is required for wastes containing 50 ppm PCB or greater. The profiled waste on the manifest number indicated below is listed hazardous waste ("B-coded") in NY. Note: 50-500 ppm PCB drained articles and small capacitors (as defined in 40CFR761.3) are not regulated by NY State. Please complete items 1.- 8. and send with the first shipment of waste/profile.

1.) Generator Name American Axle & Manufacturing

2.) Manifest Number 002550614 JTK 3.) CWM Profile# NY295590

4.) Please check *all* boxes that apply.

NY Waste Code	Identity/Type of PCB Waste	
B001	☐ Concentrated PCB Oil	
B002	☐ Oil/liquid 50-499 ppm PCBs	
B003	☐ Oil/liquid 500 ppm or greater PCBs	
B004	Manufactured PCB Articles 50-499 ppm:	☐ transformers ☐ motors ☐ switches ☐ cable ☐ pumps ☐ pipe ☐ large capacitors ☐ bushings ☐ other (specify):
B005	Manufactured PCB Articles (other than transformers) 500 ppm or greater:	☐ motors ☐ switches ☐ cable ☐ pumps ☐ pipe ☐ large capacitors ☐ bushings ☐ other (specify):
B006	☐ PCB Transformers 500 ppm or greater	
B007	Other PCB Wastes:	☐ soil ☐ sludge ☐ clothing ☐ rags ☐ wood ☒ other (specify): <u>Scrap Steel & Debris</u>

5.) Check *one* box as appropriate.

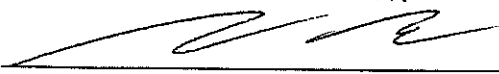
CERTIFICATION - WASTE MEETS LAND DISPOSAL TREATMENT STANDARDS

☒ I am the generator of the waste as identified above, that is restricted under 6 NYCRR Part 376. I have determined that this waste meets all applicable treatment standards set forth in 6 NYCRR 376 and, therefore, it can be landfilled without further treatment. Waste does not include solidified B002 material (liquid with PCBs 50-500ppm).

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 6 NYCRR Part 376, section 376.4. and all applicable prohibitions set forth in 376.3(b) of part 376 or RCRA section 3004(d). I believe that the information I submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

NOTIFICATION - WASTE DOES NOT MEET LAND DISPOSAL TREATMENT STANDARDS

☐ I am the generator of a waste restricted under 6 NYCRR Part 376 as identified above. I notify that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this notification that the waste does not comply with the treatment standards specified in 6 NYCRR Part 376.4 (f). This waste must be treated to the applicable standards set forth in 6 NYCRR 376.4 (f) prior to land disposal.

6.) Signature  Glenn Wygant

7.) Title Sr. Environmental Engineer 8.) Date 07-16-07



CWM CHEMICAL SERVICES, LLC

1550 Balmer Road
P.O. Box 200
Model City, NY 14107
(716) 754-8231
(716) 754-0211 Fax

AMERICAN AXLE & MANUFACTURING, INC
ATTN: ANTHONY GLIECO
NYD002127165
PO BOX 972
BUFFALO NY 14240

CERTIFICATE OF DISPOSAL

CWM CHEMICAL SERVICES, L.L.C., EPA ID: NYD049836679, has received waste material from AMERICAN AXLE & MANUFACTURING, INC on 07/16/07 as described on Shipping Document number 002550614JJK Sequence number 01. CWM CHEMICAL SERVICES, L.L.C. hereby certifies that the above described material was landfilled in accordance with the 40 CFR part 761 as it pertains to the land disposal of polychlorinated biphenyl contaminated materials.

Profile Number: NY295590
CWM Tracking ID: 8161610701
CWM Unit #: 1*0
Disposal Date: 07/16/07

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

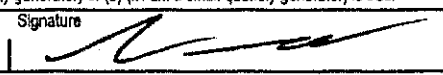
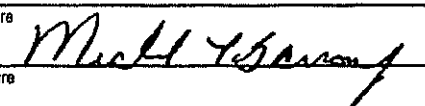
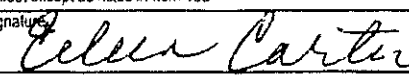
MICHAEL D MAHAR
DISTRICT MANAGER
Certificate # 306145
07/17/07

For questions please call
our Customer Service Dept.
at (800) 843-3604

From everyday collection to environmental protection, Think Green® Think Waste Management.

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

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number NYD002127185		2. Page 1 of 1	3. Emergency Response Phone (800)424-9300		4. Manifest Tracking Number 002550615 JJK		
		5. Generator's Name and Mailing Address AMERICAN AXLE & MANUFACTURING 1001 E DELAVAN AVE BUFFALO NY 14215-3148 Generator's Phone: (716) 891-7065							
6. Transporter 1 Company Name Towanda Truck Transport		U.S. EPA ID Number NY0097644801							
7. Transporter 2 Company Name		U.S. EPA ID Number							
8. Designated Facility Name and Site Address CWM CHEMICAL SERVICES, L.L.C. 1550 BALMER RD. MODEL CITY NY 14107 Facility's Phone: (716) 754-8231		U.S. EPA ID Number NYD049836679							
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))			10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
					No.	Type			
	X	1. RQ, POLYCHLORINATED BIPHENYLS, SOLID MIXTURE, 9, UN3432, III NY295590			1	CM	EST 11,000	K	B007
		2.							
		3.							
	4.								
14. Special Handling Instructions and Additional Information 1. NY295590 - SCRAP STEEL & DEBRIS CONTAMINATED W/PCBS >500 PPM PCB OUT OF SERVICE DATE: 7-12-07 WEIGHT IS ESTIMATED Box 3035 81616203 Recd 13345K									
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.									
Generator's/Offoror's Printed/Typed Name Glenn Wygant				Signature 			Month Day Year 07/16/07		
INTL	16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____								
	17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name Michael Labaree Sr Signature  Month Day Year 07/16/07 Transporter 2 Printed/Typed Name _____ Signature _____ Month Day Year _____								
DESIGNATED FACILITY	18. Discrepancy								
	18a. Discrepancy Indication Space ☒ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection Qty est. actual Recd 13345K Manifest Reference Number: _____								
	18b. Alternate Facility (or Generator)							U.S. EPA ID Number	
	Facility's Phone: _____								
	18c. Signature of Alternate Facility (or Generator)							Month Day Year	
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)									
1. H132		2.		3.		4.			
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a									
Printed/Typed Name Edwin Carter				Signature 			Month Day Year 7/18/07		

LDR NOTIFICATION OR CERTIFICATION FORM

For New York Regulated PCB Waste

This form is required for wastes containing 50 ppm PCB or greater. The profiled waste on the manifest number indicated below is listed hazardous waste ("B-coded") in NY. Note: 50-500 ppm PCB drained articles and small capacitors (as defined in 40CFR761.3) are not regulated by NY State. Please complete items 1.- 8. and send with the first shipment of waste/profile.

1.) Generator Name American Axe & Manufacturing

2.) Manifest Number 002550615 JJK 3.) CWM Profile# NY295590

4.) Please check *all* boxes that apply.

NY Waste Code	Identity/Type of PCB Waste	
B001	☐ Concentrated PCB Oil	
B002	☐ Oil/liquid 50-499 ppm PCBs	
B003	☐ Oil/liquid 500 ppm or greater PCBs	
B004	Manufactured PCB Articles 50-499 ppm:	☐ transformers ☐ motors ☐ switches ☐ cable ☐ pumps ☐ pipe ☐ large capacitors ☐ bushings ☐ other (specify):
B005	Manufactured PCB Articles (other than transformers) 500 ppm or greater:	☐ motors ☐ switches ☐ cable ☐ pumps ☐ pipe ☐ large capacitors ☐ bushings ☐ other (specify):
B006	☐ PCB Transformers 500 ppm or greater	
B007	Other PCB Wastes:	☐ soil ☐ sludge ☐ clothing ☐ rags ☐ wood ☒ other (specify): <u>Scrap Steel & Debris</u>

5.) Check *one* box as appropriate.

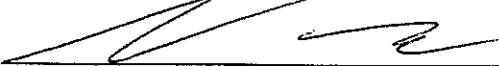
CERTIFICATION - WASTE MEETS LAND DISPOSAL TREATMENT STANDARDS

☒ I am the generator of the waste as identified above, that is restricted under 6 NYCRR Part 376. I have determined that this waste meets all applicable treatment standards set forth in 6 NYCRR 376 and, therefore, it can be landfilled without further treatment. Waste does not include solidified B002 material (liquid with PCBs 50-500ppm).

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 6 NYCRR Part 376, section 376.4. and all applicable prohibitions set forth in 376.3(b) of part 376 or RCRA section 3004(d). I believe that the information I submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

NOTIFICATION - WASTE DOES NOT MEET LAND DISPOSAL TREATMENT STANDARDS

☐ I am the generator of a waste restricted under 6 NYCRR Part 376 as identified above. I notify that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this notification that the waste does not comply with the treatment standards specified in 6 NYCRR Part 376.4 (f). This waste must be treated to the applicable standards set forth in 6 NYCRR 376.4 (f) prior to land disposal.

6.) Signature  Glenn Wygant

7.) Title Sr. Environmental Engineer 8.) Date 07-16-07



CWM CHEMICAL SERVICES, LLC

1550 Balmer Road
P.O. Box 200
Model City, NY 14107
(716) 754-8231
(716) 754-0211 Fax

AMERICAN AXLE & MANUFACTURING, INC
ATTN: ANTHONY GLIECO
NYD002127165
PO BOX 972
BUFFALO NY 14240

CERTIFICATE OF DISPOSAL

CWM CHEMICAL SERVICES, L.L.C., EPA ID: NYD049836679, has received waste material from AMERICAN AXLE & MANUFACTURING, INC on 07/18/07 as described on Shipping Document number 002550615JJK Sequence number 01. CWM CHEMICAL SERVICES, L.L.C. hereby certifies that the above described material was landfilled in accordance with the 40 CFR part 761 as it pertains to the land disposal of polychlorinated biphenyl contaminated materials.

Profile Number: NY295590
CWM Tracking ID: 8161620301
CWM Unit #: 1*0
Disposal Date: 07/18/07

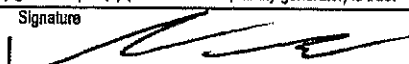
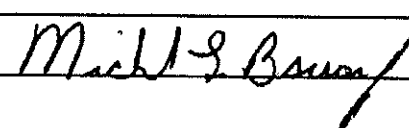
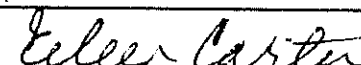
Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C 1001 and 15 U.S.C. 2615) I certify that the information contained in or accompanying this document is true accurate and complete. As to the identified section(s) of this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

MICHAEL D MAHAR
DISTRICT MANAGER
Certificate # 306259
07/19/07

For questions please call
our Customer Service Dept.
at (800) 843-3604

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

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number NYD002127165	2. Page 1 of 1	3. Emergency Response Phone (800) 424-9300	4. Manifest Tracking Number 002550616 JJK			
5. Generator's Name and Mailing Address AMERICAN AXLE & MANUFACTURING 1001 E DELAVAN AVE BUFFALO NY 14215-3148					Generator's Site Address (if different than mailing address)			
Generator's Phone: (716) 891-7065								
6. Transporter 1 Company Name TOWANDA TANK Transport					U.S. EPA ID Number NYD03764480			
7. Transporter 2 Company Name					U.S. EPA ID Number			
8. Designated Facility Name and Site Address CWM CHEMICAL SERVICES, L.L.C. 1550 BALMER RD. MODEL CITY NY 14107					U.S. EPA ID Number NYD049836679			
Facility's Phone: (716) 754-8231								
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
			No.	Type				
	X	1. RQ. POLYCHLORINATED BIPHENYLS, SOLID MIXTURE, 9, UN3432, III	1	CM	EST 11,000	K	B007	
		NY285590						
14. Special Handling Instructions and Additional Information 1. NY285590 - SCRAP STEEL & DEBRIS CONTAMINATED W/PCBS >500 PPM PCB OUT OF SERVICE DATE: 7-12-07. WEIGHT IS ESTIMATED Box 3002 81616112 Recd 6595K								
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.								
Generator's/Offor's Printed/Typed Name Glen Wygant					Signature 		Month Day Year 07/16/07	
INT'L	16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____							
	Transporter signature (for exports only): _____							
TRANSPORTER	17. Transporter Acknowledgment of Receipt of Materials							
	Transporter 1 Printed/Typed Name Michael LeBaron Jr					Signature 		Month Day Year 07/16/07
	Transporter 2 Printed/Typed Name					Signature		Month Day Year
DESIGNATED FACILITY	18. Discrepancy							
	18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection							
	Manifest Reference Number:							
	18b. Alternate Facility (or Generator) U.S. EPA ID Number							
	Facility's Phone:							
	18c. Signature of Alternate Facility (or Generator)						Month Day Year	
	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
	1. H132	2.	3.	4.				
	20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a							
	Printed/Typed Name Eden Carter					Signature 		Month Day Year 7/16/07

LDR NOTIFICATION OR CERTIFICATION FORM

For New York Regulated PCB Waste

This form is required for wastes containing 50 ppm PCB or greater. The profiled waste on the manifest number indicated below is listed hazardous waste ("B-coded") in NY. Note: 50-500 ppm PCB drained articles and small capacitors (as defined in 40CFR761.3) are not regulated by NY State. Please complete items 1.- 8. and send with the first shipment of waste/profile.

1.) Generator Name American Axle & Manufacturing

2.) Manifest Number 002550616 JJK 3.) CWM Profile# NY295590

4.) Please check *all* boxes that apply.

NY Waste Code	Identity/Type of PCB Waste	
B001	☐ Concentrated PCB Oil	
B002	☐ Oil/liquid 50-499 ppm PCBs	
B003	☐ Oil/liquid 500 ppm or greater PCBs	
B004	Manufactured PCB Articles 50-499 ppm:	☐ transformers ☐ motors ☐ switches ☐ cable ☐ pumps ☐ pipe ☐ large capacitors ☐ bushings ☐ other (specify):
B005	Manufactured PCB Articles (other than transformers) 500 ppm or greater:	☐ motors ☐ switches ☐ cable ☐ pumps ☐ pipe ☐ large capacitors ☐ bushings ☐ other (specify):
B006	☐ PCB Transformers 500 ppm or greater	
B007	Other PCB Wastes:	☐ soil ☐ sludge ☐ clothing ☐ rags ☐ wood ☒ other (specify): <u>Scrap Steel & Debris</u>

5.) Check *one* box as appropriate.

CERTIFICATION - WASTE MEETS LAND DISPOSAL TREATMENT STANDARDS

☒ I am the generator of the waste as identified above, that is restricted under 6 NYCRR Part 376. I have determined that this waste **meets** all applicable treatment standards set forth in 6 NYCRR 376 and, therefore, it can be landfilled without further treatment. Waste does not include solidified B002 material (liquid with PCBs 50-500ppm).

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 6 NYCRR Part 376, section 376.4. and all applicable prohibitions set forth in 376.3(b) of part 376 or RCRA section 3004(d). I believe that the information I submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

NOTIFICATION - WASTE DOES NOT MEET LAND DISPOSAL TREATMENT STANDARDS

☐ I am the generator of a waste restricted under 6 NYCRR Part 376 as identified above. I notify that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this notification that the waste **does not** comply with the treatment standards specified in 6 NYCRR Part 376.4 (f). This waste must be treated to the applicable standards set forth in 6 NYCRR 376.4 (f) prior to land disposal.

6.) Signature  Glenn Wygant

7.) Title Sr. Environmental Engineer 8.) Date 07-16-07



CWM CHEMICAL SERVICES, LLC

1550 Balmer Road
P.O. Box 200
Model City, NY 14107
(716) 754-8231
(716) 754-0211 Fax

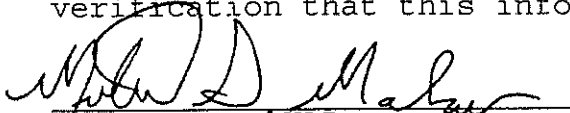
AMERICAN AXLE & MANUFACTURING, INC
ATTN: ANTHONY GLIECO
NYD002127165
PO BOX 972
BUFFALO NY 14240

CERTIFICATE OF DISPOSAL

CWM CHEMICAL SERVICES, L.L.C., EPA ID: NYD049836679, has received waste material from AMERICAN AXLE & MANUFACTURING, INC on 07/16/07 as described on Shipping Document number 002550616JJK Sequence number 01. CWM CHEMICAL SERVICES, L.L.C. hereby certifies that the above described material was landfilled in accordance with the 40 CFR part 761 as it pertains to the land disposal of polychlorinated biphenyl contaminated materials.

Profile Number: NY295590
CWM Tracking ID: 8161611201
CWM Unit #: 1*0
Disposal Date: 07/16/07

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


MICHAEL D MAHAR
DISTRICT MANAGER
Certificate # 306148
07/17/07

For questions please call
our Customer Service Dept.
at (800) 843-3604



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

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number NYD002127165	2. Page 1 of 1	3. Emergency Response Phone (877) 818-0087	4. Manifest Tracking Number 000022499 VES			
5. Generator's Name and Mailing Address AMERICAN AXLE & MFG. INC. PO BOX 972 BUFFALO, NY 14240-0972			Generator's Site Address (if different than mailing address) AMERICAN AXLE & MFG. INC. 1001 EAST DELAVAN AVE BUFFALO, NY 14215					
Generator's Phone: 716 891-7078								
6. Transporter 1 Company Name VEOLIA ES TECHNICAL SOLUTIONS			U.S. EPA ID Number NJ0080631369					
7. Transporter 2 Company Name			U.S. EPA ID Number					
8. Designated Facility Name and Site Address VEOLIA ES TECHNICAL SOLUTIONS LLC 1 EDEN LANE FLANDERS, NJ 07836			U.S. EPA ID Number NJ0080536593					
Facility's Phone: 973 347-1808								
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
			No.	Type				
	X	1. RQ, POLYCHLORINATED BIPHENYLS, LIQUID, (PCB OIL & WATER >500 PPM PCB'S), 9, UN2315, II, (RQ=1LBS/PCB'S)	010	DM	02000	K	B	PCB2
							8003	
	2.							
	3.							
	4.							
14. Special Handling Instructions and Additional Information 1) ERG:171 W:510973 A:PTA510973 - ADDENDUM ATTACHED FOR ADDITIONAL TSCA INFORMATION - ER Service Contracted by VESTS*NEED CERTIFICATE OF DISPOSAL* *VEOLIA PEMIT#NJ410* ***O.S.D. 8/2007** DRUMS G29010 - G29019								
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.								
Generator's/Offor's Printed/Typed Name Roxanne Casey			Signature Roxanne Casey			Month Day Year 09/13/07		
TRANSPORTER	16. International Shipments ☐ Import to U.S. ☐ Export from U.S.		Port of entry/exit: Date leaving U.S.:					
	Transporter signature (for exports only):							
DESIGNATED FACILITY	17. Transporter Acknowledgment of Receipt of Materials							
	Transporter 1 Printed/Typed Name MICHAEL J. FUSE		Signature Michael J. Fuse		Month Day Year 09/13/07			
	Transporter 2 Printed/Typed Name		Signature		Month Day Year			
	18. Discrepancy							
	18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection							
	Manifest Reference Number:							
	18b. Alternate Facility (or Generator) U.S. EPA ID Number							
	Facility's Phone:							
	18c. Signature of Alternate Facility (or Generator) Month Day Year							
	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
	1.		2.		3.		4.	
	20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a							
	Printed/Typed Name		Signature		Month Day Year			

ENVIRONMENTAL SERVICES **LDR NOTIFICATION OR CERTIFICATION FORM**
FOR NEW YORK STATE REGULATED PCB WASTE

1) GENERATOR NAME: AMERICAN AXEL MFG, INC
2) MANIFEST # 00002245711ES 3) VES APPROVAL # PTA 510973

4) Please check all boxes that apply. NY PCB Waste Codes:

- ☐ B001: Concentrated PCB OIL ☐ B002: Oil/ Liquid 50-499 PPM PCB's
☒ B003: Oil/ Liquid 500 PPM or greater PCB's ☐ B004: Manufactured PCB Articles 50-499 ppm:
☐ transformers ☐ motors ☐ switches ☐ cable ☐ pumps ☐ pipe ☐ large capacitors ☐ bushings
☐ other (specify): _____
☐ B005: Manufactured PCB Articles (other than transformers) 500 PPM or greater:
☐ motors ☐ switches ☐ cable ☐ pumps ☐ pipe ☐ large capacitors ☐ bushings
☐ other (specify): _____
☐ B006: PCB Transformers 500 PPM or greater ☐ B007: Other PCB Wastes: ☐ soil ☐ sludge
☐ clothing ☐ rags ☐ wood ☐ other (specify): _____

5) Check ONE box as appropriate:

Certification - Waste Meets Land Disposal Treatment Standards:

- ☐ I am the generator of the waste as identified above, that is restricted under 6NYCRR Parts 376. I have determined that this waste meets all applicable treatment standards set forth in 6NYCRR376 and, therefore, it can be land disposed without further treatment.
Waste does not include solidified B002 material (Liquid with PCB'S 50-500 PPM).

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that waste complies with the treatment standards specified in Part 376, Section 376.4 and all applicable prohibitions set forth in subdivision 376.3(b) of Part 376 or RCRA Section 3004 (d). I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification including the possibility of a fine or imprisonment.

Notification - Waste Does Not Meet Land Disposal Treatment Standards:

- ☐ I am the generator of a waste restricted under 6 NYCRR Part 376 as identified above. I notify that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this notification that the waste does not comply with the treatment standards specified in 6 NYCRR Part 376.4(f). This waste must be treated to the applicable standard set forth in 6 NYCRR Part 376.4(f) prior to land disposal.

6) SIGNATURE: Roberto Lopez (WASTE WILL BE INCINERATED)

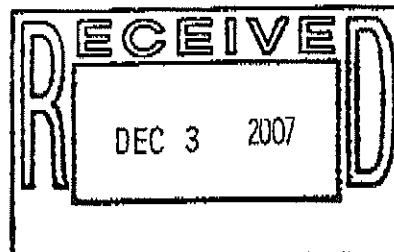
7) TITLE: Materials Coordinator 8) DATE: 9/3/07

NOTE: This form is required for wastes containing 50 ppm PCB or greater. The profiled waste on the manifest number indicated above is listed hazardous waste (B-Coded) in NY State. Note: 50-500 ppm PCB drained articles and small capacitors (as defined in 40CFR761.3) are "not" regulated by NY State. Please complete items # 1-3 above & send with first shipment of waste/profile



Veolia ES Technical Solutions, L.L.C.
Federal EPA ID: TXD000838896
State EPA ID: 50212-001
Highway 73, 3.5 miles W. of Taylor's Bayou Bridge
Port Arthur, TX 77643
(409) 736-2821

VEOLIA ES TECHNICAL SOLUTIONS
ATTN: MANIFEST SECTION
NJD980536593
1 EDEN LN
FLANDERS, NJ 07836-8950



CERTIFICATE OF DESTRUCTION

Veolia ES Technical Solutions, L.L.C. has received waste material from VEOLIA ES TECHNICAL SOLUTIONS on 10/17/2007 as described on [State Manifest or Uniform] Hazardous Waste Manifest number 000019678VES. Veolia ES Technical Solutions, L.L.C., hereby certifies that the above described material was incinerated, and thereby destroyed, in accordance with the 40 CFR, part 761, as it pertains to the incineration of Poly-Chlorinated Biphenyl contaminated materials.

Sequence 63

Profile Number: 510973

Veolia Tracking ID: 605941-63

American Axle & Mfg
000022499VES

<u>Process</u>	<u>Veolia Unit ID</u>	<u>Treatment Date</u>	<u>Generator #</u>
INCINERATION	1	11/25/2007	YL0847606000002010

Sequence 65

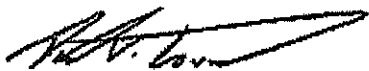
Profile Number: 510973

Veolia Tracking ID: 605941-65

American Axle & Mfg
000022499VES

<u>Process</u>	<u>Veolia Unit ID</u>	<u>Treatment Date</u>	<u>Generator #</u>
INCINERATION	6	11/25/2007	YL0847606000001010
INCINERATION	3	11/25/2007	YL0847606000001020
INCINERATION	4	11/25/2007	YL0847606000001030
INCINERATION	2	11/25/2007	YL0847606000001040
INCINERATION	1	11/25/2007	YL0847606000001050
INCINERATION	9	11/25/2007	YL0847606000001060
INCINERATION	8	11/25/2007	YL0847606000001070
INCINERATION	7	11/25/2007	YL0847606000001080
INCINERATION	5	11/25/2007	YL0847606000001090

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



Paul V. Conrad
Material Services Manager

27-Nov-07



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

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number NYD002127185	2. Page 1 of 1	3. Emergency Response Phone (877) 818-0087	4. Manifest Tracking Number 000022500 VES			
5. Generator's Name and Mailing Address AMERICAN AXLE & MFG. INC. PO BOX 972 BUFFALO, NY 14240-0972			Generator's Site Address (if different than mailing address) AMERICAN AXLE & MFG. INC. 1001 EAST DELAVAN AVE BUFFALO, NY 14215					
Generator's Phone: 718 891-7078								
6. Transporter 1 Company Name VEOLIA ES TECHNICAL SOLUTIONS			U.S. EPA ID Number NJ0080631389					
7. Transporter 2 Company Name			U.S. EPA ID Number					
8. Designated Facility Name and Site Address VEOLIA ES TECHNICAL SOLUTIONS LLC 1 EDEN LANE FLANDERS, NJ 07836			U.S. EPA ID Number NJ0080538503					
Facility's Phone: 973 347-1900								
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
	X	1. RO, POLYCHLORINATED BIPHENYLS, LIQUID, (PCB OIL, WATER, DIRT >500 PPM PCB'S), 9, UN2315, II, (RQ=1LBS/PCB'S) mcf 9/13/17	038	DM	EST 87945 44.08	K	B B003	PCB2
	2.							
	3.							
	4.							
14. Special Handling Instructions and Additional Information 1) ERG:171 W:10321 A:PTABW7131 -I- ADDENDUM ATTACHED FOR ADDITIONAL TSCA INFORMATION - ER Service Contracted by VESTS*NEED CERTIFICATE OF DISPOSAL* *VEOLIA PERMIT#NJ410* *O.S.D:9/2 2007* DRUMS G29133 - G29169								
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.								
Generator's/Offor's Printed/Typed Name Roxanne Casey-Roxanne Casey			Signature Roxanne Casey			Month Day Year 09 13 07		
16. International Shipments ☐ Import to U.S. ☐ Export from U.S.			Port of entry/exit: Date leaving U.S.:					
Transporter signature (for exports only):								
17. Transporter Acknowledgment of Receipt of Materials								
Transporter 1 Printed/Typed Name DAVID L. D'ANGELO			Signature David L. D'Angelo			Month Day Year 09 13 07		
Transporter 2 Printed/Typed Name			Signature			Month Day Year		
18. Discrepancy								
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection								
18b. Alternate Facility (or Generator) Manifest Reference Number: U.S. EPA ID Number								
Facility's Phone:								
18c. Signature of Alternate Facility (or Generator) Month Day Year								
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)								
1. 2. 3. 4.								
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a								
Printed/Typed Name			Signature			Month Day Year		

6NYCRR LDR NOTIFICATION OR CERTIFICATION FORM FOR NEW YORK STATE REGULATED PCB WASTE

1) GENERATOR NAME: AMERICAN AXEL, MFG, INC
 2) MANIFEST # 0000 22500 VES 3) VES APPROVAL # PTABW 7131

4) Please check all boxes that apply. NY PCB Waste Codes:

- ☐ B001: Concentrated PCB OIL ☐ B002: Oil/ Liquid 50-499 PPM PCB's
☒ B003: Oil/ Liquid 500 PPM or greater PCB's ☐ B004: Manufactured PCB Articles 50-499 ppm:
☐ transformers ☐ motors ☐ switches ☐ cable ☐ pumps ☐ pipe ☐ large capacitors ☐ bushings
☐ other (specify): _____
☐ B005: Manufactured PCB Articles (other than transformers) 500 PPM or greater:
☐ motors ☐ switches ☐ cable ☐ pumps ☐ pipe ☐ large capacitors ☐ bushings
☐ other (specify): _____
☐ B006: PCB Transformers 500 PPM or greater ☐ B007: Other PCB Wastes: ☐ soil ☐ sludge
☐ clothing ☐ rags ☐ wood ☐ other (specify): _____

5) Check ONE box as appropriate:

Certification – Waste Meets Land Disposal Treatment Standards:

☐ I am the generator of the waste as identified above, that is restricted under 6NYCRR Parts 376. I have determined that this waste meets all applicable treatment standards set forth in 6NYCRR376 and, therefore, it can be land disposed without further treatment.
 Waste does not include solidified B002 material (Liquid with PCB'S 50-500 PPM).

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that waste complies with the treatment standards specified in Part 376, Section 376.4 and all applicable prohibitions set forth in subdivision 376.3(b) of Part 376 or RCRA Section 3004 (d). I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification including the possibility of a fine or imprisonment.

Notification – Waste Does Not Meet Land Disposal Treatment Standards:

☒ I am the generator of a waste restricted under 6 NYCRR Part 376 as identified above. I notify that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this notification that the waste does not comply with the treatment standards specified in 6 NYCRR Part 376.4(f). This waste must be treated to the applicable standard set forth in 6 NYCRR Part 376.4(f) prior to land disposal.

6) SIGNATURE: Robanne [Signature]

7) TITLE: Material Coordinator

8) DATE: 9/13/07

(WASTE WILL BE
INCINERATED)

Note: This form is required for wastes containing 50 ppm PCB or greater. The profiled waste on the manifest number indicated above is listed hazardous waste (B-Coded) in NY State. Note: 50-500 ppm PCB drained articles and small capacitors (as defined in 40CFR761.3) are "not" regulated by NY State. Please complete items # 1-3 above & send with first shipment of waste/profile



Veolia ES Technical Solutions, L.L.C.

Federal EPA ID: TXD000838896

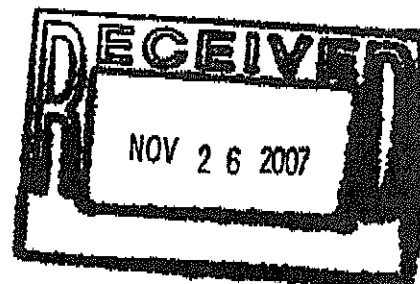
State EPA ID: 50212-001

Highway 73, 3.5 miles W. of Taylor's Bayou Bridge

Port Arthur, TX 77643

(409) 736-2821

VEOLIA ES TECHNICAL SOLUTIONS
ATTN: MANIFEST SECTION
NJD980536593
1 EDEN LN
FLANDERS, NJ 07836-8950

CERTIFICATE OF DESTRUCTION

Veolia ES Technical Solutions, L.L.C. has received waste material from VEOLIA ES TECHNICAL SOLUTIONS on 10/17/2007 as described on [State Manifest or Uniform] Hazardous Waste Manifest number 000019578VES. Veolia ES Technical Solutions, L.L.C., hereby certifies that the above described material was incinerated, and thereby destroyed, in accordance with the 40 CFR, part 761, as it pertains to the incineration of Poly-Chlorinated Biphenyl contaminated materials.

Sequence 66

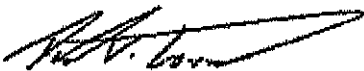
Profile Number: BW7131

Veolia Tracking ID: 605941-66

American Axle & Mfg
000022500VES

<u>Process</u>	<u>Veolia Unit ID</u>	<u>Treatment Date</u>	<u>Generator #</u>
INCINERATION	4	11/8/2007	YL0849434000001030
INCINERATION	8	11/8/2007	YL0849434000001080
INCINERATION	6	11/8/2007	YL0849434000001090
INCINERATION	11	11/8/2007	YL0849434000001100
INCINERATION	17	11/8/2007	YL0849434000001150
INCINERATION	7	11/8/2007	YL0849434000001250
INCINERATION	18	11/8/2007	YL0849434000001260
INCINERATION	21	11/8/2007	YL0849434000002010

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



Paul V. Conrad
Material Services Manager

09-Nov-07



Veolia ES Technical Solutions, L.L.C.

Federal EPA ID: TXD000838896

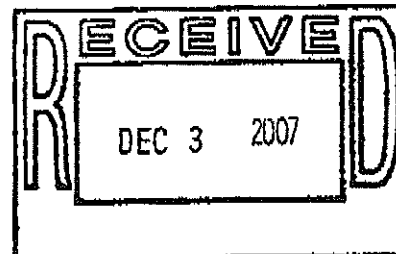
State EPA ID: 50212-001

Highway 73, 3.5 miles W. of Taylor's Bayou Bridge

Port Arthur, TX 77643

(409) 736-2821

VEOLIA ES TECHNICAL SOLUTIONS
ATTN: MANIFEST SECTION
NJD980536593
1 EDEN LN
FLANDERS, NJ 07836-8950



CERTIFICATE OF DESTRUCTION

Veolia ES Technical Solutions, L.L.C. has received waste material from VEOLIA ES TECHNICAL SOLUTIONS on 10/17/2007 as described on [State Manifest or Uniform] Hazardous Waste Manifest number 000019578VES. Veolia ES Technical Solutions, L.L.C., hereby certifies that the above described material was incinerated, and thereby destroyed, in accordance with the 40 CFR, part 761, as it pertains to the incineration of Poly-Chlorinated Biphenyl contaminated materials.

Sequence 66

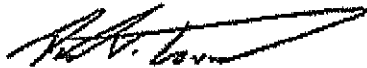
Profile Number: BW7131

Veolia Tracking ID: 605941-66

American Axle & Mfg
000022500 VES

<u>Process</u>	<u>Veolia Unit ID</u>	<u>Treatment Date</u>	<u>Generator #</u>
INCINERATION	1	11/25/2007	YL0849434000001010
INCINERATION	22	11/25/2007	YL0849434000001020
INCINERATION	3	11/25/2007	YL0849434000001040
INCINERATION	12	11/25/2007	YL0849434000001050
INCINERATION	5	11/25/2007	YL0849434000001060
INCINERATION	2	11/25/2007	YL0849434000001070
INCINERATION	10	11/25/2007	YL0849434000001110
INCINERATION	16	11/25/2007	YL0849434000001120
INCINERATION	14	11/25/2007	YL0849434000001130
INCINERATION	20	11/25/2007	YL0849434000001170
INCINERATION	13	11/25/2007	YL0849434000001190
INCINERATION	9	11/25/2007	YL0849434000001200

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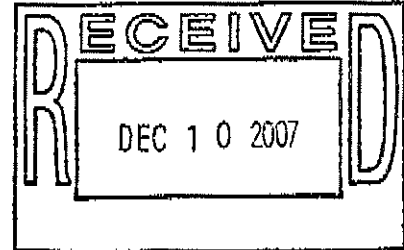
Paul V. Conrad
Material Services Manager

27-Nov-07



Veolia ES Technical Solutions, L.L.C.
Federal EPA ID: TXD000838896
State EPA ID: 50212-001
Highway 73, 3.5 miles W. of Taylor's Bayou Bridge
Port Arthur, TX 77643
(409) 736-2821

VEOLIA ES TECHNICAL SOLUTIONS
ATTN: MANIFEST SECTION
NJD980536593
1 EDEN LN
FLANDERS, NJ 07836-8950



CERTIFICATE OF DESTRUCTION

Veolia ES Technical Solutions, L.L.C. has received waste material from VEOLIA ES TECHNICAL SOLUTIONS on 10/17/2007 as described on [State Manifest or Uniform] Hazardous Waste Manifest number 000019578VES. Veolia ES Technical Solutions, L.L.C., hereby certifies that the above described material was incinerated, and thereby destroyed, in accordance with the 40 CFR, part 761, as it pertains to the incineration of Poly-Chlorinated Biphenyl contaminated materials.

Sequence 66

Profile Number: BW7131

Veolia Tracking ID: 605941-66

American Axle & Mfg
000022500VES

<u>Process</u>	<u>Veolia Unit ID</u>	<u>Treatment Date</u>	<u>Generator #</u>
INCINERATION	19	12/5/2007	YL0849434000001140
INCINERATION	15	12/5/2007	YL0849434000001160

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

A handwritten signature in black ink, appearing to read "Paul V. Conrad".

Paul V. Conrad
Material Services Manager

06-Dec-07



VEOLIA

ENVIRONMENTAL SERVICES

Inter-Company #

Veolia ES Technical Solutions, L.L.C.

Federal EPA ID: TXD000838896

State EPA ID: 60212-001

Highway 73, 3.5 miles W. of Taylor's Bayou Bridge

Port Arthur, TX 77643

(409) 736-2821

VEOLIA ES TECHNICAL SOLUTIONS

ATTN: MANIFEST SECTION

NJD980536593

1 EDEN LN

FLANDERS, NJ 07836-8950

CERTIFICATE OF DESTRUCTION

Veolia ES Technical Solutions, L.L.C. has received waste material from VEOLIA ES TECHNICAL SOLUTIONS on 10/17/2007 as described on [State Manifest or Uniform] Hazardous Waste Manifest number 0019573VES. Veolia ES Technical Solutions, L.L.C. hereby certifies that the above described material was incinerated, and thereby destroyed, in accordance with the 40 CFR, part 761, as it pertains to the incineration of Poly-Chlorinated Biphenyl contaminated materials.

Sequence

Profile Number: BW7131

Veolia Tracking ID: 605921-13

American Axle & Mfg
000022500VES

<u>Process</u>	<u>Veolia Unit ID</u>	<u>Treatment Date</u>	<u>Generator #</u>	<u>Inter-Company #</u>	<u>Date CD Was Issued</u>
INCINERATION	11	11/25/2007	YL0849434000001180		11/27/2007
INCINERATION	2	11/25/2007	YL0849434000001210		11/27/2007
INCINERATION	1	11/25/2007	YL0849434000001220		11/27/2007
INCINERATION	3	11/10/2007	YL0849434000001230		11/12/2007
INCINERATION	5	11/10/2007	YL0849434000001240		11/12/2007
INCINERATION	12	11/13/2007	YL0849434000001270		11/16/2007
INCINERATION	10	11/13/2007	YL0849434000001280		11/16/2007
INCINERATION	9	11/13/2007	YL0849434000001290		11/16/2007
INCINERATION	4	12/5/2007	YL0849434000001300		12/6/2007
INCINERATION	6	11/13/2007	YL0849434000001310		11/16/2007
INCINERATION	13	11/13/2007	YL0849434000001320		11/16/2007
INCINERATION	8	12/5/2007	YL0849434000001330		12/6/2007
INCINERATION	7	11/25/2007	YL0849434000001340		11/27/2007
INCINERATION	14	11/13/2007	YL0849434000002020		11/16/2007

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



Paul V. Conrad
Material Services Manager



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

Form Approved, OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number NYD002127165	2. Page 1 of 1	3. Emergency Response Phone (877) 818-0087	4. Manifest Tracking Number 000072940 VES	
5. Generator's Name and Mailing Address AMERICAN AXLE & MFG. INC. PO BOX 972 BUFFALO, NY 14240-0972			Generator's Site Address (if different than mailing address) AMERICAN AXLE & MFG. INC. 1001 EAST DELAVAN AVE BUFFALO, NY 14215			
Generator's Phone: 716 891-7078						
6. Transporter 1 Company Name VEOLIA ES TECHNICAL SOLUTIONS			U.S. EPA ID Number NJ D 0 8 0 6 3 1 3 8 9			
7. Transporter 2 Company Name			U.S. EPA ID Number			
8. Designated Facility Name and Site Address VEOLIA ES TECHNICAL SOLUTIONS LLC 1 EDEN LANE FLANDERS, NJ 07836			U.S. EPA ID Number NJ D 9 8 0 6 3 6 6 0 3			
Facility's Phone: 973 347-1908						
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. POLYCHLORINATED BIPHENYLS, LIQUID, (PCB OIL & WATER >500 PPM PCB'S), 9, UN2315, II, (RQ=1LBS/PCB'S)	007 DM 1400		K	B	PCB2
X	2. POLYCHLORINATED BIPHENYLS, LIQUID, (PCB OIL, WATER >500PPM PCB'S), 9, UN2315, II, (RQ=1LBS/PCB'S)	007 DM 1400		K	B	PCB2
	3.					
	4.					
14. Special Handling Instructions and Additional Information 1) ERG:171 W:510973 A:PTA510973 2) ERG:171 W:10321 A:PTABW7131 + ADDENDUM ATTACHED FOR ADDITIONAL TSCA INFORMATION - ER Service Contracted by VESTS**NEED CERTIFICATE OF DISPOSAL**VEOLIA PERMIT#NJ410**O.S.D:10/11/2007** DRUMS G29020 - G29026 AND G29170 - G29176						
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.						
Generator's/Officer's Printed/Typed Name Roxanne Casey		Signature Roxanne Casey		Month Day Year 10 12 07		
16. International Shipments ☐ Import to U.S. ☐ Export from U.S.		Port of entry/exit: Date leaving U.S.:				
17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name MICHAEL J. Foxe Signature Michael J. Foxe Month Day Year 10 12 07 Transporter 2 Printed/Typed Name Signature Month Day Year						
18. Discrepancy 18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection Manifest Reference Number: 18b. Alternate Facility (or Generator) U.S. EPA ID Number Facility's Phone: 18c. Signature of Alternate Facility (or Generator) Month Day Year						
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 1. 2. 3. 4.						
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a Printed/Typed Name Signature Month Day Year						

LDR NOTIFICATION OR CERTIFICATION FORM FOR NEW YORK STATE REGULATED PCB WASTE

1) GENERATOR NAME: AMERICAN AXEL & MCB, INC
 2) MANIFEST # 0000 72940 VES 3) VES APPROVAL # RTA B07131/PA51097

4) Please check all boxes that apply. NY PCB Waste Codes:

- ☐ B001: Concentrated PCB OIL ☐ B002: Oil/ Liquid 50-499 PPM PCB's
☒ B003: Oil/ Liquid 500 PPM or greater PCB's ☐ B004: Manufactured PCB Articles 50-499 ppm:
☐ transformers ☐ motors ☐ switches ☐ cable ☐ pumps ☐ pipe ☐ large capacitors ☐ bushings
☐ other (specify): _____
☐ B005: Manufactured PCB Articles (other than transformers) 500 PPM or greater:
☐ motors ☐ switches ☐ cable ☐ pumps ☐ pipe ☐ large capacitors ☐ bushings
☐ other (specify): _____
☐ B006: PCB Transformers 500 PPM or greater ☐ B007: Other PCB Wastes: ☐ soil ☐ sludge
☐ clothing ☐ rags ☐ wood ☐ other (specify): _____

5) Check ONE box as appropriate:

Certification – Waste Meets Land Disposal Treatment Standards:

☐ I am the generator of the waste as identified above, that is restricted under 6NYCRR Parts 376. I have determined that this waste meets all applicable treatment standards set forth in 6NYCRR376 and, therefore, it can be land disposed without further treatment.
 Waste does not include solidified B002 material (Liquid with PCB'S 50-500 PPM).

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that waste complies with the treatment standards specified in Part 376, Section 376.4 and all applicable prohibitions set forth in subdivision 376.3(b) of Part 376 or RCRA Section 3004 (d). I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification including the possibility of a fine or imprisonment.

Notification – Waste Does Not Meet Land Disposal Treatment Standards:

☒ I am the generator of a waste restricted under 6 NYCRR Part 376 as identified above. I notify that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this notification that the waste does not comply with the treatment standards specified in 6 NYCRR Part 376.4(f). This waste must be treated to the applicable standard set forth in 6 NYCRR Part 376.4(f) prior to land disposal.

(WASTE WILL BE
INCINERATED)

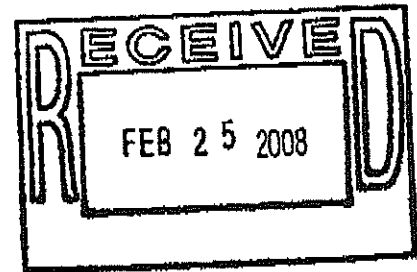
6) SIGNATURE: Gordon Casey
 7) TITLE: Material Coordinator 8) DATE: 10/12/07

Note: This form is required for wastes containing 50 ppm PCB or greater. The profiled waste on the manifest number indicated above is listed hazardous waste (B-Coded) in NY State. Note: 50-500 ppm PCB drained articles and small capacitors (as defined in 40CFR761.3) are "not" regulated by NY State. Please complete items # 1-3 above & send with first shipment of waste/ profile



Veolia ES Technical Solutions, L.L.C.
Federal EPA ID: TXD000838896
State EPA ID: 50212-001
Highway 73, 3.5 miles W. of Taylor's Bayou Bridge
Port Arthur, TX 77643
(409) 736-2821

VEOLIA ES TECHNICAL SOLUTIONS
ATTN: MANIFEST SECTION
NJD980536593
1 EDEN LN
FLANDERS, NJ 07836-8950



CERTIFICATE OF DESTRUCTION

Veolia ES Technical Solutions, L.L.C. has received waste material from VEOLIA ES TECHNICAL SOLUTIONS on 11/13/2007 as described on [State Manifest or Uniform] Hazardous Waste Manifest number 0019698VES. Veolia ES Technical Solutions, L.L.C., hereby certifies that the above described material was incinerated, and thereby destroyed, in accordance with the 40 CFR, part 761, as it pertains to the incineration of Poly-Chlorinated Biphenyl contaminated materials.

Sequence 23

Profile Number: 510973

Veolia Tracking ID: 606732-23

American Axle & Mfg.
000072940VES

<u>Process</u>	<u>Veolia Unit ID</u>	<u>Treatment Date</u>	<u>Generator #</u>
INCINERATION	4	12/19/2007	YL0860145000002010
INCINERATION	7	12/19/2007	YL0860145000002020
INCINERATION	3	12/19/2007	YL0860145000002030
INCINERATION	2	12/27/2007	YL0860145000002040
INCINERATION	5	12/19/2007	YL0860145000002050
INCINERATION	6	12/19/2007	YL0860145000002060
INCINERATION	1	12/19/2007	YL0860145000002070

Sequence 24

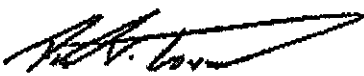
Profile Number: BW7131

Veolia Tracking ID: 606732-24

*American Axle & Mfg
000072940VES*

<u>Process</u>	<u>Veolia Unit ID</u>	<u>Treatment Date</u>	<u>Generator #</u>
INCINERATION	1	12/22/2007	YL0860145000001010
INCINERATION	2	12/22/2007	YL0860145000001020
INCINERATION	6	12/22/2007	YL0860145000001030
INCINERATION	7	12/22/2007	YL0860145000001040
INCINERATION	5	12/22/2007	YL0860145000001050
INCINERATION	4	12/22/2007	YL0860145000001060
INCINERATION	3	12/22/2007	YL0860145000001070

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



Paul V. Conrad
Material Services Manager

29-Jan-08