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

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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 onsite 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

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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 $13.4 \,\mu\text{g}/\text{wipe}$ and $32.1 \,\mu\text{g}/\text{wipe}$, 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 <u>PIT CLOSURE</u>

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 <u>WATER TREATMENT</u>

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 $0.065 \mu g/L$.

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 $0.065 \,\mu\text{g/L}$.

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 $0.065 \ \mu g/L$, 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 μ g/100 cm² wipe sample specified in 40 CFR Part 761.79 prior to being removed from the facility.

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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 <u>SUMMARY</u>

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

FIGURES



48428-04(002)GN-BU001 DEC 20/2007



48428-04(002)GN-BU002 DEC 20/2007



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G-29 LAYOUT 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

Sample Location:		East Wall South	East Wall North	West Wall South	South Wall	West Wall North	North Wall
Sample ID:		CC-48428-070607-SM-003	CC-48428-070607-SM-004	CC-48428-070607-SM-005	CC-48428-070607-SM-006	CC-48428-070607-SM-007	CC-48428-070607-SM-008
Sample Date:		7/6/2007	7/6/2007	7/6/2007	7/6/2007	7/6/2007	7/6/2007
Parameters:	Units						
Polychlorinated Biphenyls							
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

Sample Location: Sample ID: Sample Date:		Tank Bottom North WI-48428-070607-SM-001 7/6/2007	Tank Bottom South WI-48428-070607-SM-002 7/6/2007
Parameters:	Units		
Polychlorinated Biphenyls			
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

 μ g/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

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







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.







Picture 9 - View of the water treatment system.



APPENDIX B

NYSDEC APPROVAL OF WORK PLAN MODIFICATIONS

Galanti, Katherine

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From:Jaspal Walia [jswalia@gw.dec.state.ny.us]Sent:Friday, July 06, 2007 3:07 PMTo:Galanti, KatherineCc:Christopher Elleman; Glenn Wygant; Mark Williams; FilingSubject: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 "Galanti, Katherine" <kgalanti@craworld.com> From: "jaspal walia" <jswalia@gw.dec.state.ny.us> To: 6/27/2007 11:20:40 AM Date: 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 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 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

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

<u>,</u> R	oase	print or type. (Form designed for use on elite (12-pitch) typewriter.)					For	m Annroved		2050 002
	1 U	NIFORM HAZARDOUS 1. Generator ID Number	2. Page 1 of	3. Emergency Response	Phone	4. Manifest	Tracking N	lumber	OND NO.	2000-003
		WASTE MANIFEST NYD002127185	1	(800) 535-5053		00	002	2215	9 V	ES
	5.	Generator's Name and Mailing Address AMERICAN AXLE & MFG. IN PO BOX 972 BUFFALO, NY 14240-0972	······································	Generator's Site Address AMERICAN AXI 1001 EAST DEL	(ILdifferent) E & MF AVAN A	han mailing addres G. INC. VE	5S)		<u> </u>	
	Ge	nerator's Phone: 718 891-7078 7324		BUFFALO, NY	14215					
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	YE	OLIA ES TECHNICAL SOLUTIONS				DINJD	08	083	13	69
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	8. [Designated Facility Name and Site Address		······			lu ash a s			
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	Fac	ality's Phone: 873 347-1909 1 E-110 E-13, 113 07830				DLN	88	053	65(33
	9a.	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number and Backing Group (if amil)	r,	10. Contair	iers	11. Total	12. Unit			
			<u></u>	No.	Туре	Quantity	Wt./Vol.	13.	waste Code	
RATOR		& WATER >500 PPM PCB'S), 9, UN2315, 11, (RQ=1LBS/PCB'S)	BOIL	à a 🌱	ВΜ	01800	ĸ	8003 8	PCB2	
N.	X	RQ, POLYCHLORINATED BIPHENYLS, LIQUID, (PCI	Э	127		11200	-	e	PCB2	
Ĩ	<u> </u>	(RQ=1LBS/PCB'S)	······	14	D M≠	7360	ĸ	8003	······································	
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	1	G29 001 - G24 009 \$ G29	101-	G29132						ļ
	15.	GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of thi	is consignment :	are fully and accurately des	cribed above	by the proper ship	oping name	, and are clas	sified, packa	aged,
		Exporter, I certify that the contents of this consignment conform to the terms of the attach	cording to applic ed EPA Acknowi	able international and national and national edgment of Consent.	nal governm	ental regulations.	If export sh	ipment and I a	m the Prima	ary
	dia.	I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a lar	ge quantity gen	erator) or (b) (if I am a smal	quantity ger	nerator) is true.			·	
	X	Grenn L Vy90	WEN					Moni	h Day 7 h z	Year
Ļ	16.1	pternational Shipments	<u>, ∦</u>					<u> </u>	<u>μ</u> υ	<u> </u>
Z	Tran	isporter signature (for exports only);	Texbour mound	I.S. Port of enta Date leavin	y/exit: g U.S.:	· · ·				į
ER	17. 1	ransporter Acknowledgment of Receipt of Materials		11						;
S S S	Trans	sporter 1 Printed Typed Name	Sigr	nature 1. La	·			Mont	h Day	Year
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E	180.	Alternate Facility (or Generator)				U.S. EPA ID Nu	mber			
Pool Pool	Facili	ity's Dhone-				1				ļ
8	18c.	Signature of Alternate Facility (or Generator)						Mon	th Dav	Year
NAT										1
SIG	19. H	lazardous Waste Report Management Method Codes (i.e., codes for hazardous waste trea	itment, disposal	and recycling systems)				. 1		
2	1.	2.	3.			4.				
	20.5		<u> </u>	· · · · · · · · · · · · · · · · · · ·						
	20.0 Printe	resignated nacity owner or operator: Certification of receipt of hazardous materials cover ad/Typed Name	ed by the manife Sior	est except as noted in Item ature	18a			Mont	h Dav	Year
ţ										
	Form	1 8700-22 (Rev. 3-05) Previous editions are obsolete,	i					CTATE (

CONDILDR NOTIFICATION OR CERTIFICATION FORM

MEARICAN AXLE & MFG, INC 1) GENERATOR NAME: 2) MANIFEST # 0000 ZZIS9 VIES VES APPROVAL # PTA BW 7/3/

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. / IADASTE W/U

6) SIGNATURE MAN aine#8)DATE

Noic: 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

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	A	merican Axl	e & Mfg. INC
Profile Number: Veolia Tracking ID:	510973 O 6034 7 1-10	000221591	23
Process	<u>Veolia Unit ID</u>	Treatment Date	Generator #
INCINERATION	4	9/22/2007	YL0825959000002080 V

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

25-Sep-07



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.				
Profile Number: Veolia Tracking ID:	rofile Number: 510973 a Tracking ID: 603576-33		15445			
Process	Veolia Unit ID	Treatment Date	<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.

Paul V. Conrad Material Services Manager

25-Sep-07



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





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Sequence 33 Profile Number: Veolia Tracking ID:	510973 603576-33	American Axle & Mfg. 000022159VES		
Process	<u>Veolia Unit ID</u>	Treatment Date	Generator #	
INCINERATION	. 4	9/27/200 7	YL0825959000002010 🗸	
INCINERATION	5	9/27/2007	YL0825959000002020	
INCINERATION	2	9/26/2007	YL0825959000002040 🗸	
INCINERATION	1	9/26/2007	YL0825959000002050 🗸	

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Paul V. Conrad Material Services Manager

05-Oct-07



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





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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: Veolia Tracking ID:	510973 603471-10	American Axle a Mfg. 000022159NES				
Process	<u>Veolia Unit ID</u>	Treatment Date	Generator #			
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.

Paul V. Conrad Material Services Manager

15-Oct-07

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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

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		American Axle
la	014/7494	AA AAAA ISAN

Profile Number: BW7131 Veolia Tracking ID: 603471-11

Sequence 11

a Mfg. INC. 00 0022159VES

Process	<u>Veolia Unit ID</u>	Treatment Date	Generator #
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	se chan cather a se -		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	24 19	10/11/2007	YL0825959000001170

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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 -	YE0825959000001320

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Paul V. Conrad Material Services Manager

12-Oct-07

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	AMERICAN A 1001 E DELAN BUFFALO NY Generator's Phone:	XLE & MANUFA VAN AVE 14215-3148	CTURING (716)	Gene 891-7065	ralor's Sile Addr	ess (if differen	t than mailing add	ress)		<u></u>	<u>101</u>
	6. Transporter 1 Company Nam	and Tan	A Track	n/T	<u></u>		U.S. EPA I	Number			
	7. Transporter 2 Company Name	0	Trange				U.S. EPAID	Number	976	<u> 44</u>	10
	8. Designated Facility Name and										
	1550 BALI MODEL C Facility's Phone:	MER RD. ITY NY 14107	23, L.L.C. (718)	754- 8221			0.3. EPA 10		498	36	87
	9a. 9b. U.S. DOT Description	n (including Proper Shipping	Name, Hazard Class, ID Nun	nber,	10. Cont	ainers		T			
낥	1. RQ, POLYC	HLORINATED B	PHENYIS SOL	ID MIXTURE O	No.	Туре	Quantity	12. Unit WL/Vol.	13	l. Waste Coc	les
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SIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

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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	F Manufacturing	
2.) Manifest Number	002550614JJK	3.) CWM Profile#	NY 295590

4.) Please check all boxes that apply.

NY	Identity/Type of PCB Waste											
Waste												
Code												
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 in motors is switches is cable in pumps pipe is large capacitors is 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 X other (specify): 5craf Steel & Debris										

5.) Check one box as appropriate.

X

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 fort 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 <u>Gleun Wygun</u> 7.) Title <u>56</u>, <u>Envivonmental Eusineer</u> 8.) Date <u>07-16-07</u>

^{0/21/2004} PCBLDR.doc

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

CWMI

Plea	ase print or type. (Form designed for use on elite (12-pitch) typewriter.)					Form A	pproved. OMB	No. 2050-0039
1	UNIFORM HAZARDOUS 1. Generator ID Number 2. Page	1 of 3. Em	ergency Response	Phone	4. Manifest	Tracking Num		
	• WASTE MANIFEST NYD002127165	1 (8	800) 424-9	300		<u>2551</u>	1012	JJK
	5. Generator's Name and Mailing Address AMERICAN AXLE & MANUFACTURING	Genen	ator's Site Address	(if different lf	ian mailing addres	s }		
ļ	1001 E DELAVAN AVE BUIFFALO NY 14215-3148							
	Generator's Phone: (716) 891-706	5						
	6. Transporter 1 Company Name				U.S. EPAID N	lumber		,
	LONBLORNDA LOUK LOANSPORT					<u>0974</u>	<u> </u>	
	7. Transporter 2 Company Name				0.5. EPAID N	umper		
	8. Designated Facility Name and Site Address				U.S. EPAID N	lumber		
	CWM CHEMICAL SERVICES, L.L.C.				61 V			
	1550 BALMER XD. MODEL CITY NY 14107				NT	U U 4	8030	078
	Facility's Phone: (716) 754-82	<u>31</u>						
	9a. 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number,		10. Contai	ners	11. Total	12. Unit	13. Waste	Codes
	HM and Packing Group (if any))		No.	Туре	Quantity	WL/Vol.		
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	14. Special Handling Instructions and Additional Information				L	L		
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	PCB OUT OF SERVICE DATE: 1 - 12 - 07	Δ.	WEIG	HTISE	STIMATEL)		
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	marked and labeled/placarded, and are in all respects in proper condition for transport according to	applicable in	temational and nat	ional governm	nental regulations.	lf export ship:	nent and I am the	Primary
	Exporter, I certify that the contents of this consignment conform to the terms of the attached EPAAct I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantities at the statement identified in 40 CFR 262.27(a) (if I am a large quantities at the statement identified in 40 CFR 262.27(a) (if I am a large quantities at the statement identified in 40 CFR 262.27(a) (if I am a large quantities at the statement identified in 40 CFR 262.27(a) (if I am a large quantities at the statement identified in 40 CFR 262.27(a) (if I am a large quantities at the statement identified in 40 CFR 262.27(a) (if I am a large quantities at the statement identified in 40 CFR 262.27(a) (if I am a large quantities at the statement identified in 40 CFR 262.27(a) (if I am a large quantities at the statement identified in 40 CFR 262.27(a) (if I am a large quantities at the statement identified in 40 CFR 262.27(a) (if I am a large quantities at the statement identified in 40 CFR 262.27(a) (if I am a large quantities at the statement identified in 40 CFR 262.27(a) (if I am a large quantities at the statement identified in 40 CFR 262.27(a) (if I am a large quantities at the statement identified in 40 CFR 262.27(a) (if I am a large quantities at the statement identified in 40 CFR 262.27(a) (if I am a large quantities at the statement identified in 40 CFR 262.27(a) (if I am a large quantities at the statement identified in 40 CFR 262.27(a) (if I am a large quantities at the statement identified in 40 CFR 262.27(a) (if I am a large quantities at the statement identified in 40 CFR 262.27(a) (if I am a large quantities at the statement identified in 40 CFR 262.27(a) (if I am a large quantities at the statement identified in 40 CFR 262.27(a) (if I am a large quantities at the statement identified in 40 CFR 262.27(a) (if I am a large quantities at the statement identified in 40 CFR 262.27(a) (if I am a large quantities at the statement identified in 40 CFR 262.27(a) (if I am a large quantities at the state	knowiedgma v cenerator)	nt of Consent. or (b) (if I am a sma	all quantity qe	nerator) is true.			
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ISN	Transporter 2 Printed/Typed Name	Signature		<u> </u>	ej esta		Month	Day Year
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FAC	Facility's Phone:				1			
ជ្រ	18c. Signature of Alternate Facility (or Generator)						Month	Day Year
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200	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, dis	sposal, and re	cycling systems)					
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	20, Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the Printed/Typed Name	manifest exc Signature	epi as noted in Ilên	188	,	,	Month	Dayn Year
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		DEGR		JULIT			over for the	

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	F Manufacturing	
2.) Manifest Number	002550615 JJK	3.) CWM Profile#	Nº 295590

4.) Please check all boxes that apply.

NY	Ident	ity/Type of DCB Waste										
Waste	ruching, i ype of FCB waste											
Code												
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										
B005	Manufactured PCB Articles (other than transformers) 500 ppm or greater:	 motors is switches is cable in pumps in pipe large capacitors is bushings other (specify): 										
B006	☐ PCB Transformers 500 ppm or greater											
B007	Other PCB Wastes:	□ soil □ sludge □ clothing □ rags □ wood										

5.) Check one box as appropriate.

X

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 fort 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 <u>Glenu Wysant</u> 7.) Title <u>5</u>V, <u>Environmental Engineev</u>, 8.) Date <u>07-16-07</u> 10/21/2004 PCBLDR.doc

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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

CWMI

Pie	ase pri	nt or type. (Form desig	gned for use on el	ite (12-pitch) ty	pewriter.)							Form	Annoved ON	IR No. 2050.0030
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		4132	ľ				J.				†* .			
	20. Des	ignated Facility Owner or	Operator: Certificatio	n of receipt of ha	izardous mate	erials covere	d by the manifest	except as	nated in Item	f8a		·		
	Printed/	Typed Name	I. N.	. 1			Signatu	are 🗸	- 1.	/	1. 1. 0-		Month	Day Year
	Form 0	700-22 (Pay 2.05) D-	ELL A	11TU					Uli	<u>r C</u>	arti	2	171	607
- 74	0.000	100-22 (Nev. 3-03) Pf	ewona equiona su	e 00501010.			DES	SIGNA	FED FAC	ILITY TO	DESTINA	ION ST.	ATE (IF RE	CIBRIUD

- 2.7 **.<u>0:5</u>5

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 1	txle	F Manufacturing	
2) Manifest Number	002550416 T	TK	2) CWM Drofio#	11295590
2.) Mannest Number	UUFJJUGIGJ		3.) CWM Prome#	15213210

4.) Please check all boxes that apply.

NY	Ident	ity/Type of PCB Waste							
Waste	radianty, type of t CD Waste								
Code									
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 is switches is cable in pumps in pipe large capacitors is bushings other (specify): 							
B006	□ PCB Transformers 500 ppm or greater								
B007	Other PCB Wastes:	\Box soil \Box sludge \Box clothing \Box rags \Box wood X other (specify): Scraf Steel & Debris							

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 fort 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 <u>Glenn Wygun</u> 7.) Title <u>5v. Environmental Eusineer</u> 8.) Date <u>07-16-07</u>

0/21/2004 PCBLOR Joy



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

|--|--|--|

Ple	ase p	rint or type. (Form desig	ned for use on elite (12-pitch) typev	vriter.)						For	m Approve	I. OMB No.	2050-003
Î	UM	IFORM HAZARDOUS	1. Generator ID Number	<u> </u>	2. Page 1 of	3. Emerge	ncy Respons	e Phone	4. Manifest	Tracking I	Number		ee
	5.6	enerator's Name and Mailin	Address	65	1	Generator's	13-0087 Site Address	uf different	than mailing addre		2243)] V	69
			ANERICAN, AXL	E & MFG. INC	•	AMER				331			
			BÚFFÁLO, NY -	14240-0972				цжужіч.	AVE				
	Ger	erator's Phone: 718 85	11-7078			BUFFA	ALO, MY	14215					
	6. T	ransporter 1 Company Name							U.S. EPAID	Number			
	<u>₩</u> 7. т	anspoder 2 Company Name									<u>и о з</u>	13	0 9
		anopones 2 company runs	•						0.3. EFAID :	AUTHORI			
	8. D	esignated Facility Name and	Site Address	UMPAL ON L	TUNNE				U.S. EPA ID I	Number			
	[LLC.	nnical oute	HONO								
		070 041	TEDEN LANE	07836									
	Faci	lity's Phone: 813 34	i-1908 0.15 7102,112							1 4 8		65	83
	9a.	95. U.S. DOT Descriptio and Packing Group (if ar	n (including Proper Shipping Name, Haz ny))	ard Class, ID Number,			10. Contai	ners Turno	11. Total Otiantity	12. Unit	13.	Waste Code	25
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lğ		& WATER >500	2 PPM PC8'S), 9, UN2315	, JI,			1 1 0	T. 14	00000				
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	14. 5	I pecial Handling Instructions	and Additional Information	C-4743865400		540070	1 4000						
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	15		- 7 010 - GZ			م الدينية الم					<u> </u>		
	10.	marked and labeled/placard	ed, and are in all respects in proper cond	fition for transport acco	rding to applica	able internati	onal and natio	nal governm	ental regulations.	pping name If export shi	, and are clas ipment and I	isified, packa am the Prima	iged, iry
	,	Exporter, I certily that the co I certify that the waste minim	ntents of this consignment conform to the nization statement identified in 40 CFR 2	e terms of the attached 62.27(a) (if I am a large	EPA Acknowle quantity gene	adgment of C rator) or (b) (ionsent. If I am a smal	l quantity ger	nerator) is true.				
N	Gene	rators/Offeror's Printed/Type	ed Namé		Sign	ature)	,	/			Mor	th Day	Year
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NT'I	10, in	remailorial Shipments	Import to U.S.		Export from U,	s. /	Port of ent	ry/exit:	<u> </u>				
R.	17. Tr	ansporter Acknowledgment of	of Receipt of Materials				Date leavin	ig U.S.:	•}				
RTE	Trans	porter 1 Printed/Typed Name			Signa	ature /	/ · /			/	Mon	h Day	Үеаг
SPC	-	MICHA	EL J. USIZ			<u>AA</u>	W/AK	$\underline{\langle}$	h he	<i>"</i>	$ \mathcal{O} $	7/13	107
RAN	Frans	poner 2 Printed/Typed Name	e		Siĝna	atore		e			Mon	ih Day I	Year
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ILT.	18b. A	Iternate Facility (or Generate	or)						U.S. EPA ID Nu	mber			
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ED	18c. S	ignature of Alternate Facility	(or Generator)					····.			Mon	th Day	Year
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SIG	19, Ha	zardous Waste Report Man	agement Method Codes (i.e., codes for h	azardous waste treatm	ient, disposal, a	and recycling	systems)				······		
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	20. UE Printe	signated Pacinty Owner of C d/Typed Name	Perator, Gennication of receipt of hazard	ious materials covered	by the manifes Signa	si except as i iture	noted in Item	169			Mont	h Dav	Year
Ļ													
EPA	Farm	8700-22 (Rev. 3-05) Pre	evious editions are obsolete.	· · · · ·	l,,,,,,				•			••••••••••••••••••••••••••••••••••••••	L

LDR NOTIFICATION OR CERTIFICATION FORM

WERICAN AXEL IM 1) GENERATOR NAME 2) MANIFEST # 0000 224991155

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

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./ $I_{\rm L}$)ASTE LUME

applicable standard set forth in 6 NYCRR Part 376.4(f) prior to land disposal. (WASTE WILL B 5) SIGNATURE: Rentmand Costern (JUKINERATED 6) SIGNATURE: I'M William Mark 8)DATE:

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 2 - 7

والالالاليونين لالترك الأ



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 Eiphenvicontaminated materials.

Sequence 63		Amer	ican Axlex Mfg
Profile Number: Veolia Tracking ID:	510973 605941-63	0000	Daz499VES
Process	<u>Veolia Unit ID</u>	Treatment Date	Generator #
INCINERATION	1	11/25/2007	YL0847606000002010
Sequence 65		Amer	can Axlex Mfo
Profile Number: Veolia Tracking ID:	510973 605941-65	0000	22499VEC
Process	<u>Veolia Unit ID</u>	Treatment Date	Generator #
INCINERATION	6 .	11/25/2007	YL0847606000001010
INCINERATION	3	11/25/2007	YL084760600001020
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	YL084760600001090

<u>ب</u>ر

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



P:6	sase print or type. (Form designed for use on elite (12-pitch) typewriter.)	1				Foi	m Approved	. OMB No	. 2050-003
Â	UNIFORM HAZARDOUS 1. Generator ID Number WASTE MANIFEST N Y D 0 0 2 1 2 7 1 8 5	2. Page 1 of	3. Emergency Response (877) 818-0087	e Phone	4. Manifest	002	Number 2250	0	ΈS
	AMERICAN AXLE & MFG. IN PO BOX 972 BUEFAL O MY 14240-0072	IC.	Generator's Site Address AMERICAN AX 1001 EAST DEI	(if different) LE & MI LAVAN	than mailing addres FG , INC , AVE	ss)			-
	Generator's Phone: 718 891-7078	1	BUFFALO, NY	14215					
	6. Transporter 1 Company Name		· · · · · · · · · · · · · · · · · · ·		U.S. EPAID	Number	0 8 0	4 ~	 2 0
	7. Transporter 2 Company Name				U.S. EPA ID N	Number	003	1 5	09
	8. Designated Facility Name and Site Address								
	VEOLIA ES TECHNICAL SOL L.L.C. 1 EDEN LANE	LUTIONS			0.3. EFA 10 P	vuxnder			
	Facility's Phone: 973 347-1909 FLANDERS, NJ 07830				NJD	88	053	85	83
	ga. 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number HM and Packing Group (if any))	ər,	10. Contair No.	ners Type	11. Totai Quantity	12. Unit Wt./Vol.	13. '	Naste Code	:5
RATOR	X "RU, POLYCHLORINATED BIPHENYLS, LIQUID, (PC OIL,WATER, DIRT >500 PPM PCB'S), 9, UN2315, 11, (RQ=1LBS/PCB'S)	≫ -∕-	036	ΟM	\$7745	к	8 9003	PC82	
GENE	2.	<i>i/r</i>			· · · · · · · · · · · · · · · · · · ·				
	3.								
	4.								
	TSCA INFORMATION - ER Service Contracted by VESTS" 2007" DRUMS G29133 - G29169 15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of the marked and labeled/decorded and are in all rescent in some contents of the	IZI A:PTABV	V7131 ADDE TFICATE OF DI	SPOSA	ATTACHED L* "VEOLIA) FOR / PERM	ADDITIO IT#NJ411	VAL]* *O.S ified, packa	.D:9 //2 . ged,
	Exporter, I certify that the contents of this consignment conform to the terms of the attacht I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a lar	ed EPA Acknowled rge quantity genera	ie international and natio gment of Consent. tor) or (b) (if I am a small	nal governm quantity ger	ental regulations. Ii nerator) is true.	f export shi	pment and I a	n the Prima	ry
	Generational Shipmente	Signat	Joan	nel	adu		Monti	n Day 3∣1 3	Year
III	Transporter signature (for exports only):	Export from U.S.	Port of entry Date leaving	y/exit: g U.S.:	<u> </u>				
RTER	17. Theosporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name	Siopate	in a second seco	1	\rightarrow	+:	Month	Dev	Vara
ANSPOI	Transporter 2 Printed/Typed Name) ang	52	Δh	<u>nas</u>	ALO Month		
¥ TR	18. Discrepancy					· · · · ·			
	18a. Discrepancy Indication Space Quantity Type		Residue		Partial Reject	tion		Full Rejec	tion
- 	18b. Alternate Facility (or Generator)		Manifest Reference N	iumber: .	U.S. EPA ID Nun	nber		<u>.</u>	
D FACII	Facility's Phone:				1				
NATEL	18c. Signature of Alternate Facility (or Generator)						Month	Day	Year
ESIG	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste Ireat	tment, disposal, an	d recycling systems)					I	
	··· 2.	3.			4.				
	20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covere Printed/Typed Name	ed by the manifest of	except as noted in Item 1	8a					
Ť		signatul I	e				Month	Day	Year
EPA F	Form 8700-22 (Rev. 3-05) Previous editions are obsolete.			·					

LDR NOTIFICATION OR CERTIFICATION FORM

1) GENERATOR NAME: 2) MANIFEST # OOOO 之

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

[] 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:

[X] 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 / $i_{\rm N}$ ASTE WILL BI

6) SIGNATURE: 8) DATE:

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 40 CFR 761.3) are "not" regulated by NY State. Please complete items # 1-8 above & send with first shipment of waste/ profile





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

- . : · · · · ·



CERTIFICATE OF DESTRUCTION

A. 14.

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		Ame	rican Axled Y	Mfq
Profile Number: Veolia Tracking ID:	BW7131 605941-66	000	DZZSOOVE	2
Process	<u>Veolia Unit ID</u>	Treatment Date	Generator #	
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 in	- 11/8/2007-	- YL0849434000001150	·
INCINERATION	7	11/8/2007	YL0849434000001250	
INCINERATION	18	11/8/2007	YL0849434000001260	
INCINERATION	21	11/8/2007	YL0849434000002010	

2

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.

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أأصحر ورضاح ورجحه فالالاردان كالالمحصي كألالاتها كالعراق فالمصحح حيرا حججرك المحجوفة المتحافظت

Paul V. Conrad Material Services Manager

09-Nov-07

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المتحديثين حسرت كا



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

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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 PolyChlorinated Piptenvicontability contability.



Sequence 66

Profile Number: BW7131 Veolla Tracking ID: 605941-66 American Axlea MSg 000022500 VES

Process	<u>Veolia Unit ID</u>	Treatment Date	Generator #
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

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



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; Veolia Tracking ID;	BW7131 605941-66	Americ 0000	an Axlex Mfg 22500 VES
Process	Veolia Unit ID	Treatment Date	Generator #
INCINERATION	19 15	12/5/2007 12/5/2007	YL0849434000001140 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.

Paul V. Conrad Material Services Manager

06-Dec-07

MAY-05-2008 11:15 VEOLIA 05/05/2008 09:56 409/361036



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 inclnerated, and thereby destroyed, in accordance with the 40 CFR, part 761, as it pertains to the incineration of Poly-Chlorinated Biphenyl contaminated materials.

1.111.000-01

Date CD

Sequence

BW7131 Profile Number: 605921-13 Veolla Tracking ID:

American Axlea Mfg 000022500VES

Steene 2	Veolia Unit ID	Treatment Date	<u>Generator #</u>	Inter-Company #	Was Issued
Process		110000110110			11/27/2007
	11	11/25/2007	YL0849434000001180		440720007
	2	11/25/2007	YL0849434000001210		1112112007
INCINERATION	2	44/05/0007	VI 0849434000001220		11/27/2007
INCINERATION	1	11/20/2007	NL 0040494000001230		11/12/2007
INCINERATION	3	11/10/2007	1.0049434000001200		11/12/2007
INCINERATION	5	11/10/2007	YL0849434000001240		11/16/2007
INCINERATION	12	11/13/2007	YL0849434000001270		101012001
	10	11/13/2007	YL0849434000001280		11/16/2007
INCINERATION	0	41/13/2007	YL0849434000001290		11/16/2007
INCINERATION	3	40(6)0007	VI 0849434000001300		12/6/2007
INCINERATION	4		NU 004042400001310		11/16/2007
INCINERATION	6	11/13/2007	T20049434000001310		11/16/2007
INCINERATION	13	11/13/2007	YL0849434000001320		12/4/2007
INCINERATION	8	12/5/2007	, YL0849434000001330		121012007
MONTON	7	11/25/2007	YL0849434000001340		11/27/2007
INCINERATION		44/42/2007	VI 0849434000002020		11/16/2007
INCINERATION	14	11110/2007			

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Paul V. Conrad Material Services Manager



	ase	print or type. (Form desig	ned for use	on elite (12-pitch)	typewriter.)	10.0-07				Foi	m Approve	d. OMB No	. 2050-003
		NIFORM HAZARDOUS WASTE MANIFEST	N Y D	00212	7165	2. Page 1 of	3. Emergency Respor 877) 818-0081	ise Phone	4. Manifes	007	^{Number} 7292	10 V	ΈS
	5.	Generator's Name and Mailin	ig Address	AMERICAN PO BOX 972	AXLE & MFG. INC		enerator's Site Addre \MERICAN A 1001 EAST DE	ss (if different XLE & Mi ELAVAN	than mailing addre FG. INC. AVE	ess)		··	
	Ge	nerator's Phone: 718 39	1-7078	DUFFALD, N	n 14240-0872	ľ	OUFFALO, NY	′ 14215					
	6.	Transporter 1 Company Nam	ė						U.S. EPA ID	Number			···
	V	EOLIA ES TECHNI	ICAL SO	LUTIONS					NJE) () ()	0 8 3	13	89
	7.	Fransporter 2 Company Nam	e						U.S. EPA ID I	Number			<u></u>
	8.1	Designated Facility Name and	d Site Address	VEOLIA ES 1 L.L.C. 1 EDEN LAN	ECHNICAL SOLL	TIONS			U.S. EPA ID	Number			
	Fac	ility's Phone: 973 347	7-1909	FLANDERS,	NJ 07836					9 8	0 6 3	8 5	Q 3
	9a HM	9b. U.S. DOT Descriptio and Packing Group (if at	on (including P ny))	roper Shipping Name	e, Hazard Class, ID Number,		10. Conti No.	ainers Type	11. Total Quantity	12. Unit Wt./Vol.	13	Waste Code	s
RATOR -	X	1RQ, POLYCHU & WATER >500 (RQ=1LBS/PCE	ORINATI) PPM P(3'S)	ED BIPHENY 29'S), 9, UN2	LS, LIQUID, (PC8 315, 11,	OIL	mz	Des	11/00	K.	9 9003	PCB2	
GENE	X				LS, LIQUID, (PCB				1700		В	PCB2	
Ī			3'8)		a, UN2310, II,		007	DN	1400	к	8003		
		5.											
		4.								-			
	14. : A 🗆	Special Handling Instructions	and Additiona		ERG:171 W:51097	A:PTA51	0973 2) ERG	5:171 W:1	0321 A:PTA		31 - -		
	DIS	SPOSAL* VEOLA	PERMIT		S.D:10/11/2007**	A HON - EI	K Gervice Con	tracted b	y vests••p	VEED C	ERTIFI	CATE O	-
	15.	GENERATOR'S/OFFEROR	<u>DZD</u> - 'S CERTIFIC/	GLOZL ATION: I hereby dec	AND G29 lare that the contents of this	Consignment are t	29176 ully and accurately de	scribed above	by the proper shi	ping name	, and are clas	sified, packa	ged,
	_	Exporter, I certify that the co I certify that the waste minim	ed, and are in ntents of this o hization statem	ail respects in prope consignment conform lent identified in 40 C	r condition for transport acco to the terms of the attached FR 262.27(a) (if I am a large	rding to applicable EPA Acknowledg quantity generate	international and nat ment of Consent. m) or (b) (if I am a sma	ional governm all quantity ger	iental regulations, i terator) is true.	lf export shi	pment and 1	am the Prima	ry
X	Gen	erator's/Offeror's Printed/Type	mame			Signatu	e Maril				Mor	th Day	Year
E	46. I	nternational Shipments		no u.s.		Export from U.S.	Port of en	drv/exit:	ng -	<u>d</u>	1	un 2	μ /
R.	Tran 17. T	sporter signature (for exports ransporter Acknowledgment o	only): If Receipt of M	aterials			Date leavi	ng U.S.:	0				
PORT	Trans	porter 1 Printed/Typed Name	17	· For	<u>,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,</u>	Signatur	Ma	17	1	1	Moni Z I I	h Day	Year
RANS	Trans	porter 2 Printed/Typed Name		1	•	Signatu	•	len-		/0	Mon	h Day	Year
	18. D	iscrepancy			· · · · · · · · · · · · · · · · · · ·				F				
	18a. I	Discrepancy Indication Space	° 🗆 a	uantily	Туре		Residue		Partial Rejec	tion		Full Rejec	tion
l≿	185.7	Alternate Facility (or Generato	or)				Manifest Reference	Number:	U.S. EPA ID Nu	mber			
FACIL	Facili	lv's Phone:							f				
NATED	18c. 5	Signature of Alternate Facility	(or Generator)	· · · · · · · · · · · · · · · · · · ·			**************************************				Mon	h Day	Year
ESIG	19. H	azardous Waste Report Mana	igement Metho	od Codes (i.e., codes	; for hazardous waste treatm	ent, disposal, and	recycling systems)	,			<u>`</u>		
	••			۷.		3.			4.				
	20. De Printe	esignated Facility Owner or O d/Typed Name	perator: Certif	cation of receipt of h	azardous materials covered	by the manifest en Signature	cept as noted in Item	18a			Mont		Vasr
		9700 00 (0											ıedi
CFA F	OIM	0100-22 (ISEV. 3-05) Pre	vious edition	s are obsolete.			5 - C		n na kana la			t a blue	

OR NOTIFICATION OR CERTIFICATION FORM ENVIRONMENT NEW YORK STATE REGULATED PCB WASTE

1) GENERATOR NAME 2) MANIFEST #

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

[] B001: Concentrated PCB OIL	[] B002: Oil/ Liquid 50-499 PPM PCB's
X 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):	<u>-</u>
[] 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 δ NYCRR 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:

 $\sqrt{1}$ 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) SIGNATUR 8) DATE:

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

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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

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M	FEB	25	2008	U

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	
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Profile Number: Veolia Tracking ID: 510973 606732-23

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American Axle a Mfg 000072940VES

Process	<u>Veolia Unit ID</u>	Treatment Date	Generator #
INCINERATION	4	12/19/2007	YL0860145000002010
INCINERATION	7	12/19/2007	YL0860145000002020
INCINERATION	3	12/19/2007	YL0860145000002030
INCINERATION	2	12/27/200 7	YL0860145000002040
INCINERATION	5	12/19/2007	YL0860145000002050
INCINERATION	6	12/19/2007	YL0860145000002060
INCINERATION	1	12/19/2007	YL0860145000002070

Sequence 24

Profile Number:

Veolia Tracking ID:

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BW7131

606732-24

American Axley Mfg 000072940VES

veolia nacking io.	000702-24		
Process	Veolia Unit ID	Treatment Date	Generator #
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
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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