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1986-11-23. Part_373_
Permit_App_Addendums_
A_thru_K

GENERAL ELECTRIC

APPARATUS AND ENGINEERING SERVICES OPERATIONS
GENERAL ELECTRIC COMPANY • 175 MILENS ROAD • TONAWANDA, NEW YORK 14150 • (716) 876-1200

November 23, 1986

New York State
Department of Environmental Conservation
Division of Regulatory Affairs - Region 9
600 Delaware Avenue
Buffalo, NY 14202-1073

ATTENTION: Mr. Paul D. Eismann

REFERENCE: General Electric Company - Buffalo Service Shop
EPA ID No. NYD067539940
Application No. 90-84-1218

Dear Sir:

The following data is being submitted in reply to the notice of incomplete permit application of September 2, 1986.

Utilize notice of incomplete application letter of September 2, 1986 as a guide. Addendums A thru K attached will contain our replies to deficiencies listed or indicate where in original Part 373 permit application information will be contained.

There is one item required that we cannot supply as of this writing. Floodplain Standard Documentation received from the Federal Emergency Management Agency was for the incorrect section. Floodplain Documentation has been reordered and will be submitted under separate cover when received.

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We believe the additional information furnished will complete our 373 permit application.

Sincerely,

A. Hejmanowski
PCB Specialist

cc: Paul Counterman, Chief
Bureau of Hazardous Waste Technology
NYS Department of Environmental Conservation
50 Wolf Road
Albany, NY 12233

Andrew Bellina, Chief
NYS Permit Section
US Environmental Protection Agency, Region II
26 Federal Plaza
New York, NY 10278

ADDENDUM A

ADDENDUM A

A. PART A APPLICATION

1. EPA FORMS 3510-1 and 3520-1 ATTACHED

FORM 3 RCRA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER: F N Y D 0 6 7 5 3 9 9 4 0 1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

[ ] 2. NEW FACILITY *(Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*: C 8 | YR. 6 9 | MO. 1 1 | DAY 0 3

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN: YR. | MO. | DAY

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 1. FACILITY HAS INTERIM STATUS

[ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY – For each code entered in column A enter the capacity of the process.

1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C DUP 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1	S 0 1	1,100	G		7				
	S 0 2	1,200	U		8				
3					9				
4					10				

Continued from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY – For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:
   For listed hazardous waste: For each listed hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

Continued from page 2.

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)														FOR OFFICIAL USE ONLY											
W	N	Y	D	0	6	7	5	3	9	9	4	0		1	W									2	DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (If a code is not entered in D(1))
1	D001	3,000	P	S01	
2	D002	20,000	P	S02	
3	D002	500	P	S01	
4	F001	3,000	P	S01	
5	F017	2,000	P	S01	
6	F018	500	P	S01	
7	P102	10	P	S01	
8	U134	50	P	S01	
9	U226	200	P	S01	
10	D007	200	P	S01	
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTES *(continued)*

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. *(enter from page 1)*

F NYD067539940 T/A . C 6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail)*.

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground—level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail)*.

ACILITY GEOGRAPHIC LOCATION

LATITUDE *(degrees, minutes, & seconds)*	LONGITUDE *(degrees, minutes, & seconds)*
42 59 03 5	78 53 02 0

VIII. FACILITY OWNER

[X] A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. *(area code & no.)*
E	

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
	G		

IX. OWNER CERTIFICATION

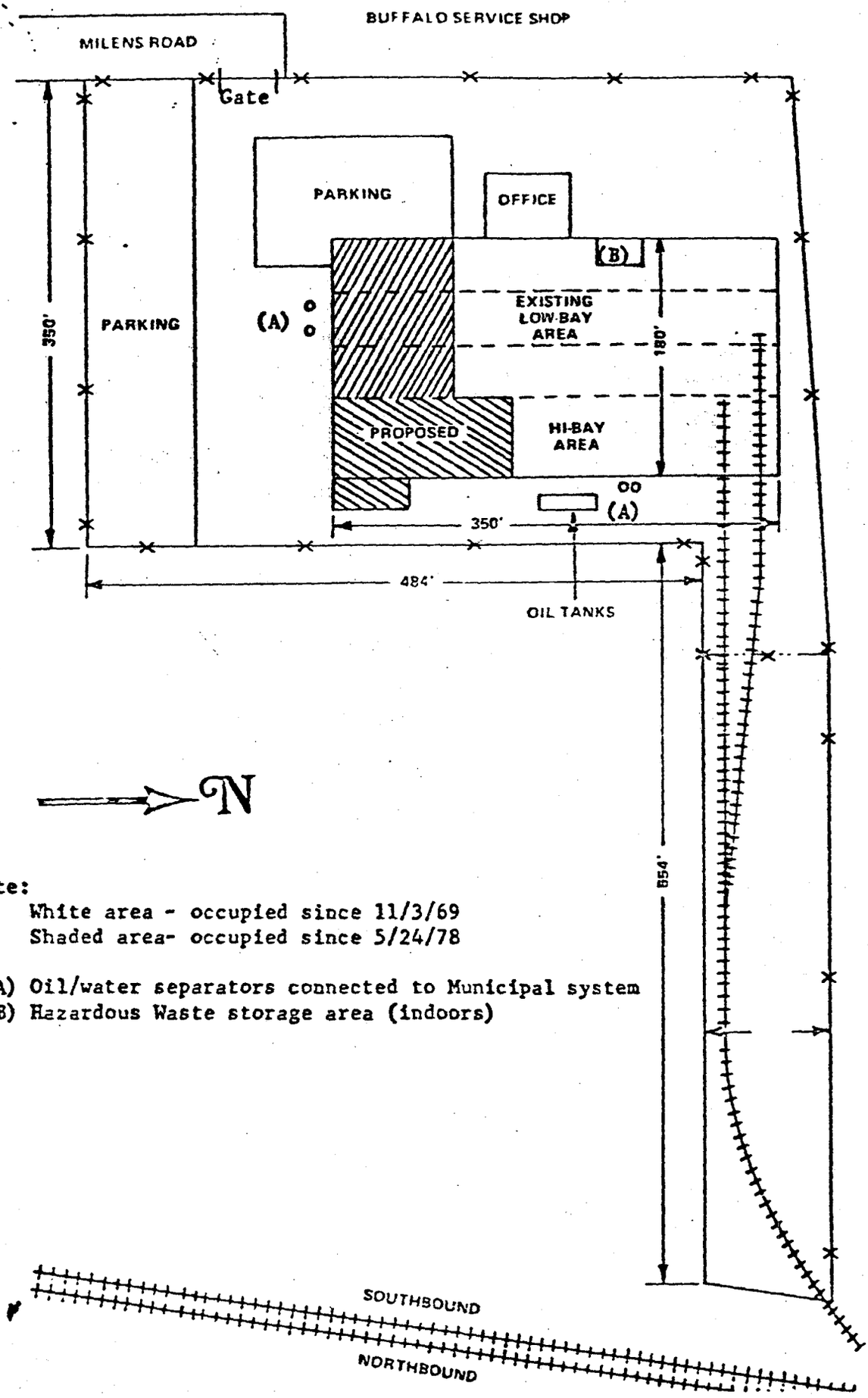
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED

X. OPERATOR CERTIFICATION

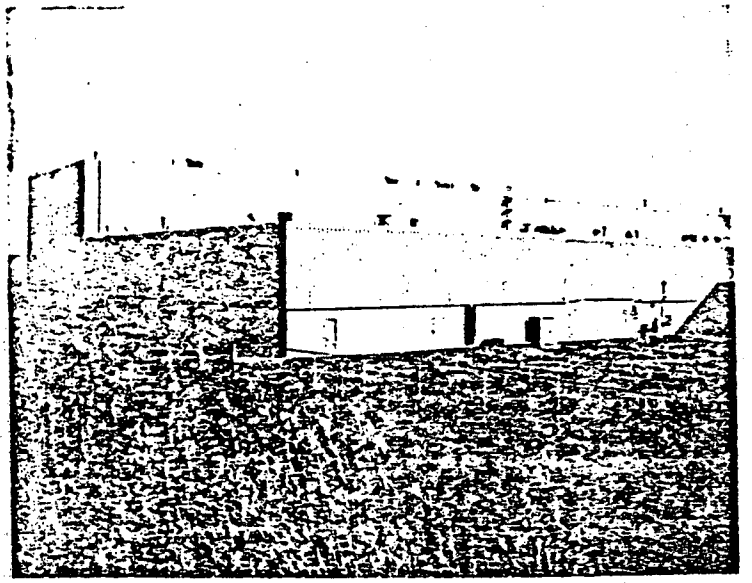
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
Bruce Roberts, Vice President & Gen. Manager, Apparatus Service Business Div.		

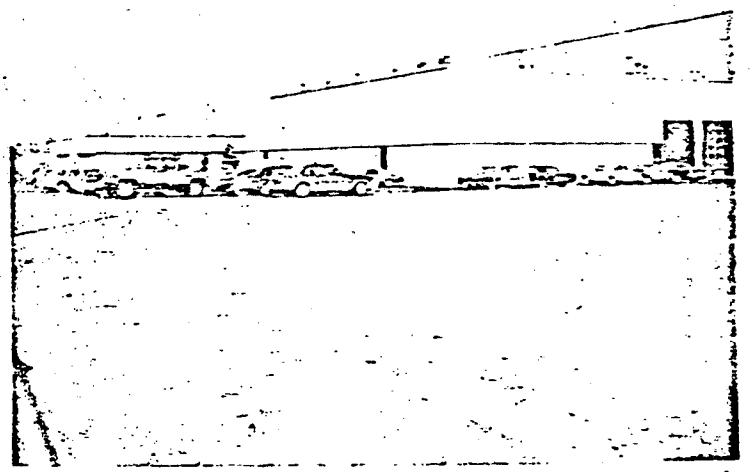


Note:
White area - occupied since 11/3/69
Shaded area- occupied since 5/24/78

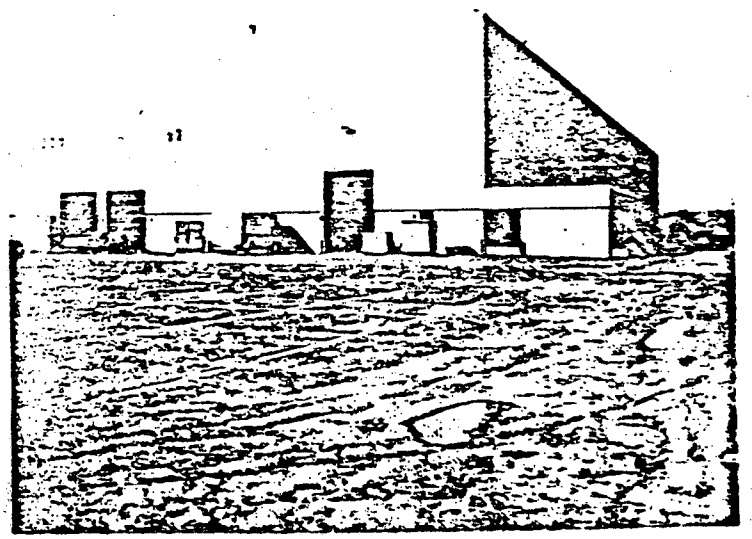
(A) Oil/water separators connected to Municipal system
(B) Hazardous Waste storage area (indoors)



FROM N.W.



FROM S.W.



FROM S.E.

INFORMATION ABOUT USE OF OFF-SITE TREATMENT, STORAGE, OR DISPOSAL (TSD) FACILITIES

THIS SUPPLEMENT TO "FORM 3 RCRA - HAZARDOUS WASTE PERMIT APPLICATION" MUST BE ATTACHED ONLY TO THE COPY OF FORM 3 THAT IS SUBMITTED TO GE's ENVIRONMENTAL PROTECTION OPERATION

GE Component's EPA I.D. No.
NYD067539940

GE Component: BUFFALO SERVICE SHOP

Location: TONAWANDA, NY 14150

INSTRUCTIONS

(1) Fill out one of these sheets for each off-site facility to which you intend to ship hazardous waste after November 19, 1980, assuming that the facility is legally qualified to engage in hazardous waste activity after November 19.

(2) In the spaces provided below, give:

- The name and location of the off-site facility.
- The EPA hazardous waste numbers or the wastes you intend to send to the facility
- The name and location of the transporter you intend to use in shipping the wastes to the facility (for this item, include GE-owned transportation).
- The number of sheets included in this supplement.

OFF-SITE TREATMENT, STORAGE, OR DISPOSAL FACILITY

NAME	CITY OR TOWN	ST.	ZIP CODE
CECOS INTERNATIONAL INC NYD008033624 1	NIAGARA FALLS	NY	14302

WASTES SENT TO ABOVE FACILITY (GIVE EPA HAZARDOUS WASTE NUMBER)

1	2	3	4	5	6
D002	F001	F018	U134	U226	D007
7	8	9	10	11	12

TRANSPORTER USED TO SHIP WASTE TO ABOVE FACILITY

NAME	CITY OR TOWN	ST.	ZIP CODE
CECOS INTERNATIONAL INC + GE TRUCK	NIAGARA FALLS	NY	14302

Date 10/24/80

INFORMATION ABOUT USE OF OFF-SITE TREATMENT, STORAGE, OR DISPOSAL FACILITIES

THIS SUPPLEMENT TO "FORM 3 RCRA - HAZARDOUS WASTE PERMIT APPLICATION" MUST BE ATTACHED ONLY TO THE COPY OF FORM 3 THAT IS SUBMITTED TO GE's ENVIRONMENTAL PROTECTION OPERATION

GE Component's EPA I.D. No.
NYD067539940

GE Component: BUFFALO SERVICE SHOP

Location: TONAWANDA | NY | 14150

INSTRUCTIONS

(1) Fill out one of these sheets for each off-site facility to which you intend to ship hazardous waste after November 19, 1980, assuming that the facility is legally qualified to engage in hazardous waste activity after November 19.

(2) In the spaces provided below, give:

- The name and location of the off-site facility.
- The EPA hazardous waste numbers or the wastes you intend to send to the facility
- The name and location of the transporter you intend to use in shipping the wastes to the facility (for this item, include GE-owned transportation).
- The number of sheets included in this supplement.

- - - - - - - - - -

OFF-SITE TREATMENT, STORAGE, OR DISPOSAL FACILITY

NAME: DOWNING CONTAINER SERVICE

CITY OR TOWN: 191 GANSON ST BUFFALO | ST.: NY | ZIP CODE: 14203

WASTES SENT TO ABOVE FACILITY (GIVE EPA HAZARDOUS WASTE NUMBER)

1	2	3	4	5	6
D001	D002	F017	P102		
7	8	9	10	11	12

TRANSPORTER USED TO SHIP WASTE TO ABOVE FACILITY

NAME: DOWNING CONTAINER SERVICE

CITY OR TOWN: BUFFALO | ST.: NY | ZIP CODE: 14203

Date 10/24/80

Sheet No. 2 of 2

(fill—in areas are spaced for elite type, i.e., 12 characters/inch). Form Approved OMB No. 158-R0178

FORM 1 GENERAL

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER: F N Y D 0 6 7 5 3 9 9 4 0

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill—in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill—in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

LABEL ITEMS

I. EPA I.D. NUMBER: NYD067539940

II. FACILITY NAME

V. FACILITY MAILING ADDRESS: GENERAL ELECTRIC
175 MILLENS RD
TONAWANDA, NY 14150

VI. FACILITY LOCATION: 175 MILLENS RD
TONAWANDA, NY 14150

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold—faced terms.

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X	
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	
J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP: GENERAL ELECTRIC COMPANY

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*
2 DESMARAIS PAUL J SHOP MANAGER	716 876 1200

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX: 3 175 MILENS ROAD

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 TONAWANDA	NY	14150

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER: 5 175 MILENS ROAD

B. COUNTY NAME: ERIE

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE *(if known)*
6 TONAWANDA	NY	14150	

CONTINUE ON REVER

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
C 7 7699 (specify) REPAIR AND RELATED SERVICES (NEC)	C 7 7694 (specify) ARMATURE REWIND SHOP
C. THIRD	**D. FOURTH**
C (specify)	C 7 (specify)

VIII. OPERATOR INFORMATION

A. NAME

C 8 GENERAL ELECTRIC COMPANY

B. Is the name listed in Item VIII-A also the owner? ☒ YES ☐ NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)

F = FEDERAL M = PUBLIC (other than federal or state)
S = STATE O = OTHER (specify)
P = PRIVATE

P (specify)

D. PHONE (area code & no.)

C A 716 876 1200

E. STREET OR P.O. BOX

75 MILENS ROAD

F. CITY OR TOWN | **G. STATE** | **H. ZIP CODE** | **IX. INDIAN LAND**

C B TONAWANDA | NY | 14150

Is the facility located on Indian lands? ☐ YES ☒ NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)	D. PSD (Air Emissions from Proposed Sources)
C T I 9 N	C T I 9 P 9-0163-25
B. UIC (Underground Injection of Fluids)	**E. OTHER** (specify)
C T I 9 U	C T I 9 9-016737 (specify) AIR EMISSIONS
C. RCRA (Hazardous Wastes)	**E. OTHER** (specify)
C T I	C T I 9 9-016738 (specify) AIR EMISSIONS

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

REPAIR OF INDUSTRIAL EQUIPMENT.

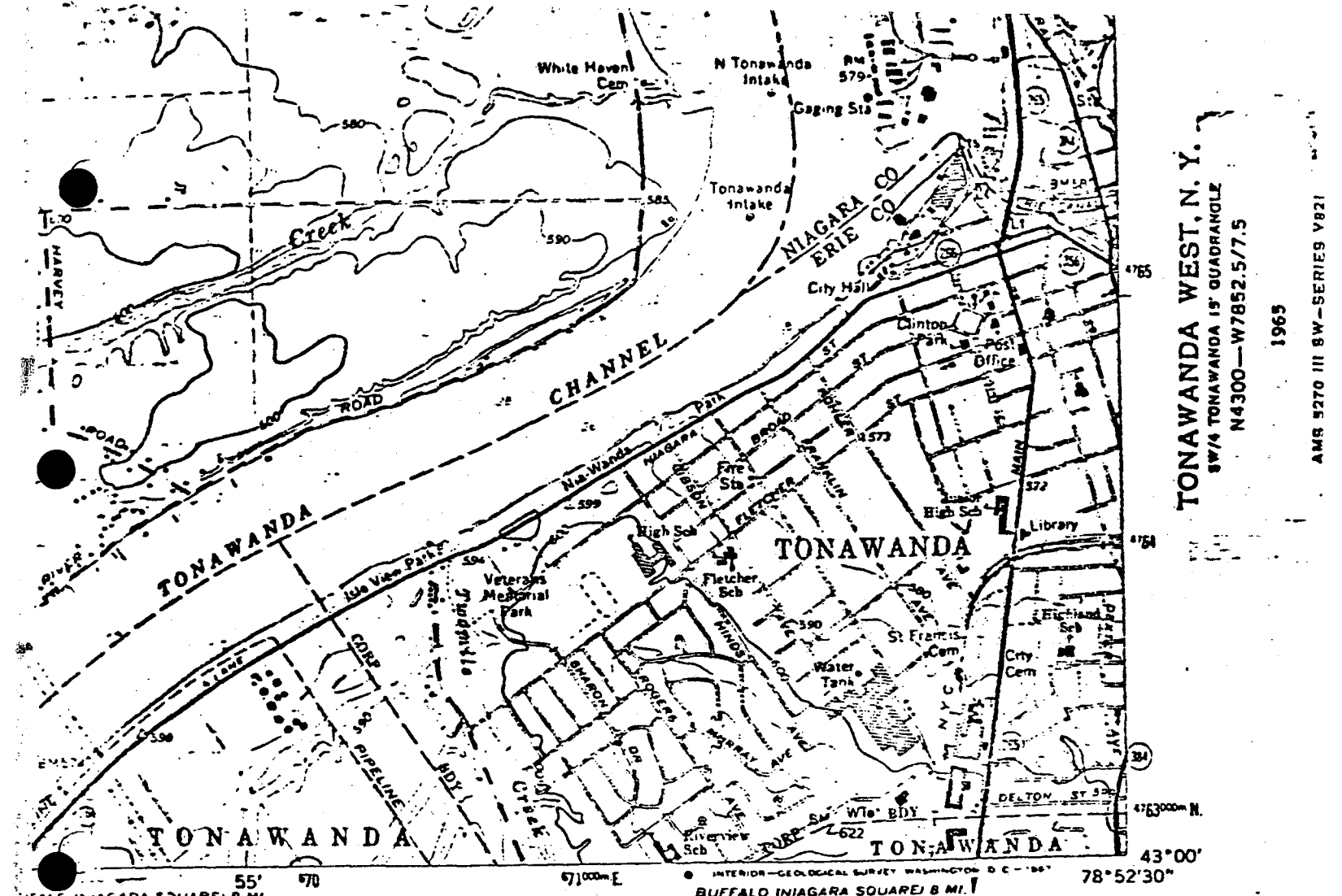
XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
ice Roberts, Vice President & General nager, Apparatus Service Business Div.		

COMMENTS FOR OFFICIAL USE ONLY

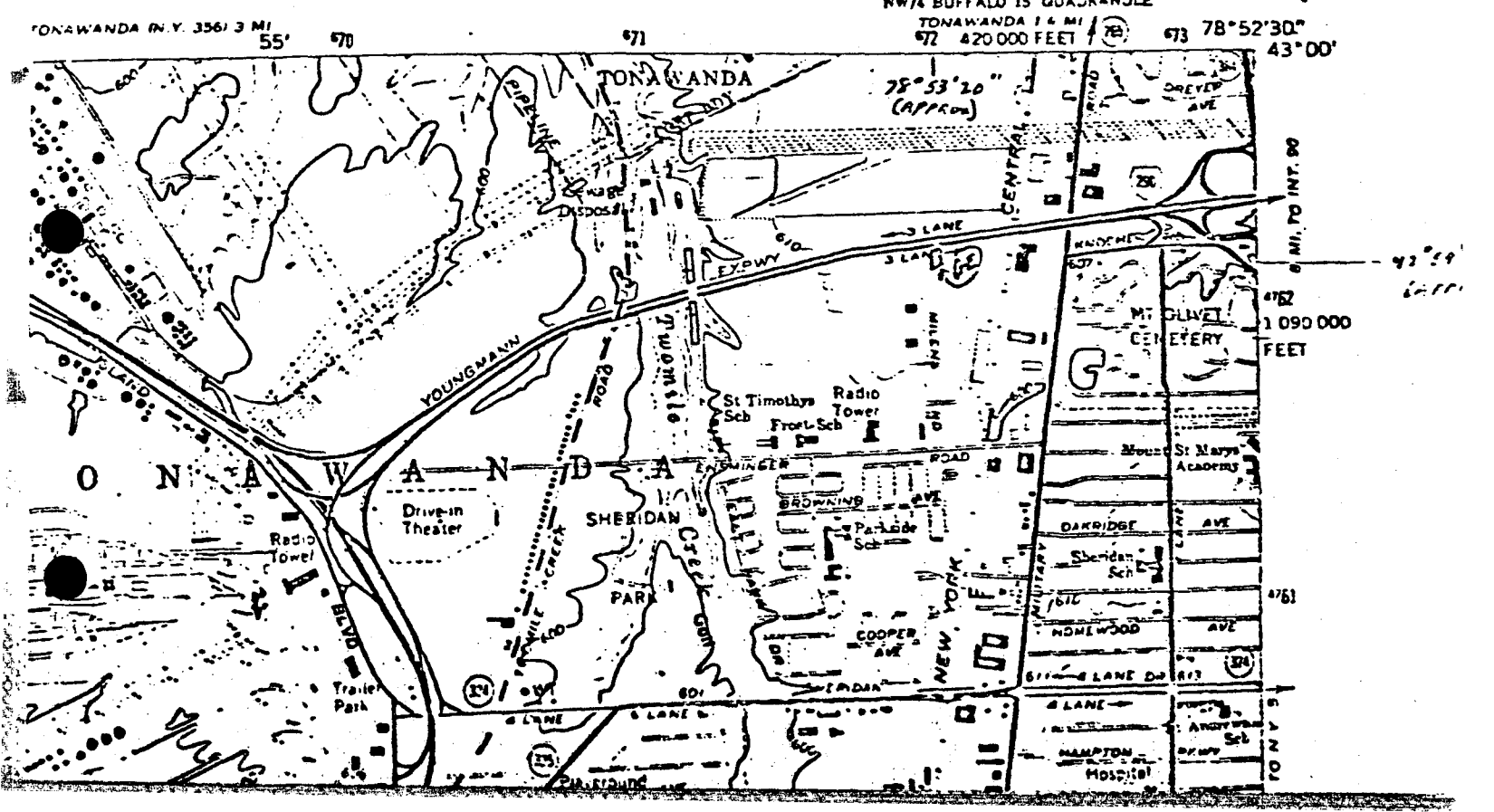
C



BUFFALO NW QUADRANGLE
NEW YORK–ONTARIO
7.5 MINUTE SERIES (TOPOGRAPHIC)

NW/4 BUFFALO 15' QUADRANGLE

5270 III SE (TONAWANDA EAST)



ADDENDUM B

1. GENERAL DESCRIPTION - ATTACHED
2. TOPOGRAPHIC MAP - ATTACHED
3. FLOOD PLAN STANDARD - TO BE FURNISHED LATER
4. TRAFFIC INFORMATION - ATTACHED

I. FACILITY DESCRIPTION

The General Electric Buffalo Service Shop is involved in the repair of industrial equipment, including electric motors, transformers, turbines, pumps, compressors, etc. in the performance of these repair activities, the facility generates hazardous wastes (on-site generated wastes) as defined in the applicable state and federal environmental regulations.

The General Electric Buffalo Service Shop also receives PCB liquids, solids, and articles (New York Dec Hazard Waste Numbers B001 through B007) from customers and other General Electric repair facilities for storage prior to shipment to qualified disposal sites.

The hazardous wastes generated on-site are:

Shop process wastes, generated by shop processes such as: Steam cleaning, painting, metalizing, abrasive blasting, manual cleaning of parts with rags and solvents, insulating varnish, collection of used lubricants and motor oil; PCB contaminated solvents and solids.

Discarded stock materials that exhibit characteristics of hazardous waste (this amount is minimal due to strict enforcement of the attached minimization program).

The following summary shows the waste type, the process generating the waste, and waste generation point:

WASTE TYPE	PROCESS GENERATING WASTE	WASTE GENERATION & POINT-SHOP LOCATION
Sludge	Steam cleaning operation	Steam cleaning booths (Loc. 1 & 2)
Sludge/waste water	Painting	Water wash paint booth (Loc. 3)
Sludge	Metalizing process	Metalizing booth

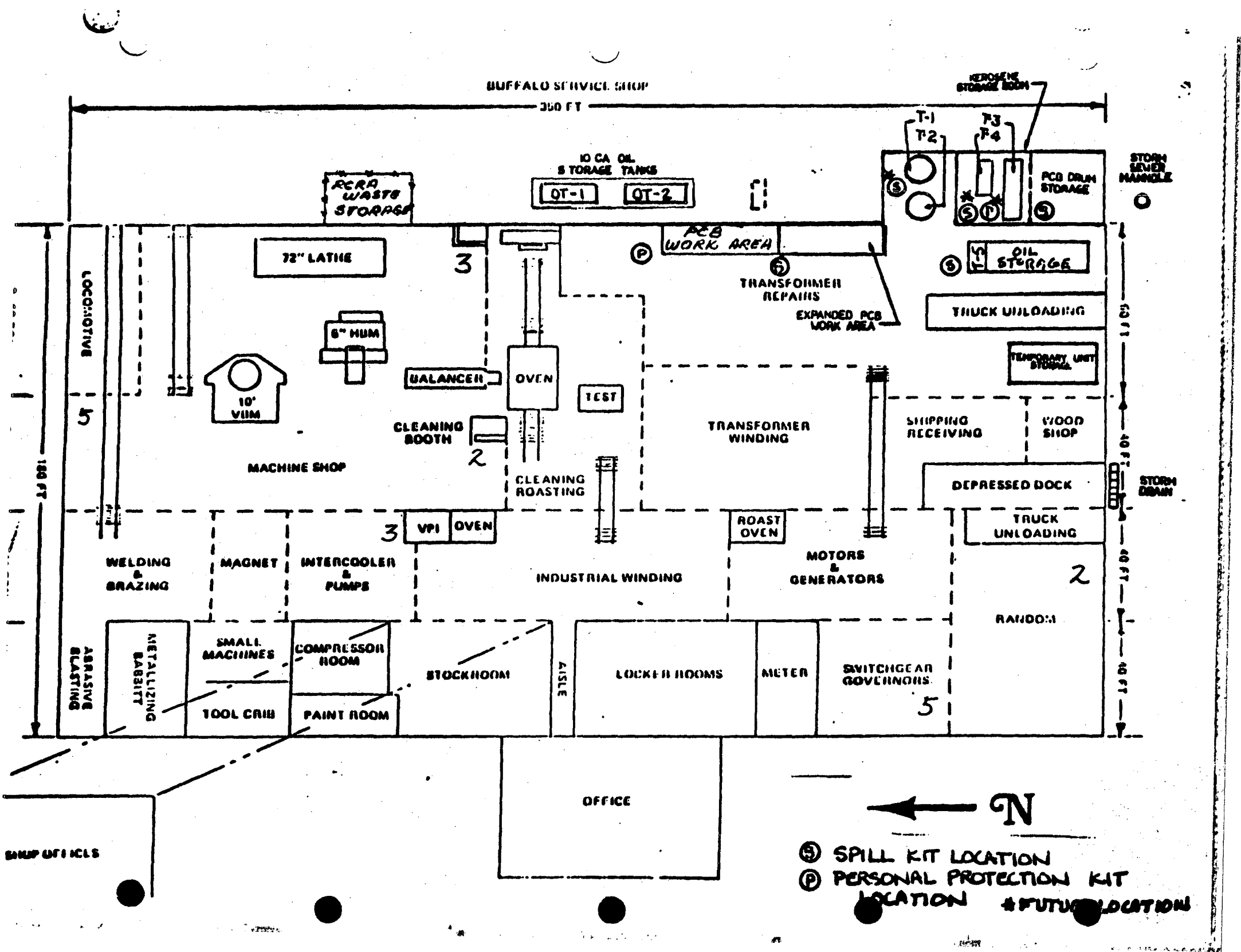
FACILITY DESCRIPTION

WASTE TYPE	PROCESS GENERATING WASTE	WASTE GENERATION & POINT-SHOP LOCATION
Abrasive blasting fines	Abrasive blasting	Abrasive Blast Cabinet (Loc. 5)
Waste Motor/ Lubricant oil	Oil drainage from various equipment/collection of used lubricating oil	Various locations
Rags, used brushes other debris soaked with flammable solvent thinners	Manual cleaning	Various locations
Paint & varnish residue	Painting/varnish treating operation	*Paint booth (Loc. 3) *Varnish tank (Loc. 3)
Flammable solvent & thinners	Paint thinning Manual cleaning	*Paint booth (Loc. 3) various locations
PCB contaminated solvents and solids	Flushing PCB contaminated transformers/repair work	PCB area

*Locations indicated on attached drawing of the Buffalo shop.

The Buffalo Service Shops has established specifically designated locations as collection areas in which frequently disposed of Hazardous Waste materials are accumulated. Collection containers, with covers, are placed in these areas. Collection containers are properly labeled, stating the type of Hazardous Waste they contain and the proper category of Hazardous Waste material. Collection containers used for ignitable wastes are Factory Mutual approved.

Hazardous Waste materials that are infrequently discarded are sent directly to the designated Hazardous Waste storage area as they are generated. Hazardous Wastes are stored in containers that are compatable with the wastes and are in good condition. The storage area has an impervious base, free of cracks and gaps, and the containment system has sufficient capacity to contain 10% of the volume of the containers. Also, run-on into the containment system is prevented.


BUFFALO SERVICE SHOP
350 FT
KEROSENE STORAGE ROOM
T-1
T-2
T-3
T-4
10 CA OIL STORAGE TANKS
OT-1
OT-2
RCRA WASTE STORAGE
PCB DRUM STORAGE
STORM SEWER MANHOLE
72" LATHE
PCB WORK AREA
TRANSFORMER REPAIRS
EXPANDED PCB WORK AREA
OIL STORAGE
TRUCK UNLOADING
6" HUM
10' VHM
BALANCER
OVEN
TEST
CLEANING BOOTH
TRANSFORMER WINDING
SHIPPING RECEIVING
WOOD SHOP
TEMPORARY UNIT STORAGE
MACHINE SHOP
CLEANING ROASTING
DEPRESSED DOCK
STORM DRAIN
VPI
OVEN
ROAST OVEN
TRUCK UNLOADING
WELDING & BRAZING
MAGNET
INTERCOOLER & PUMPS
INDUSTRIAL WINDING
MOTORS & GENERATORS
RANDOM
ABRASIVE BLASTING
METALLIZING BABBITT
SMALL MACHINES
COMPRESSOR ROOM
TOOL CRIB
PAINT ROOM
STOCKROOM
AISLE
LOCKER ROOMS
METER
SWITCHGEAR GOVERNORS
OFFICE
SAMP OFFICES
180 FT
60 FT
40 FT
40 FT
40 FT
N
SPILL KIT LOCATION
PERSONAL PROTECTION KIT LOCATION
FUTURE LOCATION

RCRA WASTE MINIMIZATION PROGRAM

CONTENTS:

General Electric Company
Buffalo Apparatus Service Shop
175 Milens Road
Tonawanda, New York 14150

EPA ID No. NYD067539940

RCRA WASTE MINIMIZATION PROGRAM
General Electric Co.
Buffalo Service Shop

I. GOAL

The goal of the General Electric Buffalo Service shop, RCRA Waste Minimization Program is to reduce the amount of hazardous waste generated from shop processes and where ever possible to reduce the hazards associated with such materials through substitution and/or elimination of hazardous material.

II. RCRA HAZARDOUS WASTE STREAMS

The major RCRA hazardous wastes generated in Buffalo Service Shop are as follows: paint and varnish residues, scrap paints and varnishes; waste flammable solvents and thinners (Toluene, Xylene, 1500 Thinner, Mineral Spirits), waste corrosive materials (steam cleaning materials, etching solutions); sludges (oil/water separator, steam cleaning, area sumps, water wash paint booth).

III. RCRA WASTE MINIMIZATION PLAN

1. Plan to reduce volume of waste paints and varnishes:
    a. Timely ordering and storing to minimize shelf life waste.
    b. Complete utilization of materials from paint and varnish containers.
    c. Longer draining time of jobs after varnish immersion to reduce deposits of insulating varnishes in drip pans.
    d. When possible, batch several jobs for painting to reduce generation of paint brushes, paint mixing tools, paint soaked rags, etc.

2. Plan to reduce volume of waste flammable solvents and thinners and waste nonflammable cleaning solvent.
   a. Complete utilization of solvents and thinners from drums (solvent and thinner drums to be thoroughly drained).
   b. Solvent and thinners used on the shop floor will be placed in containers marked with the contents to prevent mixing of solvent and thinners and subsequent disposal as hazardous waste.
   c. All discarded or contaminated solvent and thinners will be placed in designated drums marked for that specific material. The contents will be recycled by outside firm.

3. Plan to reduce volume of waste corrosive material.
   a. Timely ordering and storing to minimize shelf life waste.
   b. Complete utilization of materials from containers.

4. New material procurement control.

   In order to control hazardous waste effectively, Buffalo Service Shop has instituted a control mechanism wherein materials purchased which could result in a generation of hazardous waste are required to be reviewed by a qualified individual prior to being approved for purchase.

   This review and approval is conducted to ensure that the least hazardous practical alternatives for a particular operation is secured.

IV. ACTIONS TO EVALUATE FUTURE WASTE MINIMIZATION POTENTIAL AND MINIMIZE ENVIRONMENTAL RISKS

Evaluation of infrequently used materials or similar materials (paints, varnishes, solvents) will be initiated in November 1985, to determine if their use can be eliminated.

Evaluation of possible volume reduction of other wastes (sludges) through economical practicable methods will be initiated in December 1985 with completion expected to be completed in January 1986.

Before any waste is disposed of it will be evaluated on a periodic basis with the disposal firm for appropriateness of the disposal/treatment option.

V. ANNUAL SUMMARY

In order to ensure a high visibility for waste minimization activities, Buffalo Service Shop will prepare an Annual Summary Report by February 1 of each calandar year. This report will summarize hazardous waste minimization activities for that year.

R. Conway
Manager
Buffalo Service Shop

T. Hejmanowski
Hazardous Waste Coordinator
Buffalo Service Shop

II. TRAFFIC INFORMATION

All service operations at the Buffalo Service Shop which involve PCB liquids, solids, articles, are conducted in accordance with Federal EPA Regulations 40CFR761, New York State Hazardous Waste Regulations 6NYCRR Part 370 through 373 and the General Electric Apparatus and Engineering Services Procedures.

The Buffalo Service Shop receives PCB liquids, solids, and articles for storage prior to disposal. These materials are also generated by the Buffalo Service Shop from service and repair activities at the facility and at customers' locations. PCB items received by the Buffalo Service Shop consist of drummed liquids and solids, and PCB articles. Upon arrival of the PCB shipment, a certified PCB supervisor reviews the PCB unloading Authorization Form obtained from authorized Shop Management Personnel. See Attachment A

The certified PCB supervisor receives and dates the PCB item and signs the hazardous waste manifest. The manifest copies are sent to the PCB Specialist for review and distribution and the material is moved to the PCB work area. The PCB Specialist issues the job planning as required, and maintains records of the material received, and generated by decontamination. The PCB items are then placed in the PCB Storage Area or shipped to a qualified disposal site.

All items shipped for disposal are manifested as PCB items unless tests are obtained to verify that PCB concentrations are below 50 ppm. The PCB Specialist is responsible for obtaining PCB Test Analysis and maintaining test reports. The manifest are prepared and distributed by the PCb Specialist who also arranges for shipment and disposal with qualified transporters and disposal sites. The PCB Specialist maintains records of PCB materials received, shipped, and in inventory. These records are maintained in the facility's files for five years.

FACILITY DESCRIPTION

Loading/unloading of wastes received at or shipped from Buffalo Service Shop are done in unloading area, southeast corner of facility. Material is loaded/unloaded by or under direct supervision of a certified PCB supervisor. Wastes received are loaded/unloaded using overhead cranes or fork trucks with barrel lifting device attachment. Wastes received are immediately put into PCB work area or contained temporary storage. Wastes to be shipped are loaded onto transport as removed from storage areas.
See Attachment B.

Attachment A

GENERAL ELECTRIC

APPARATUS AND ENGINEERING SERVICES OPERATIONS
GENERAL ELECTRIC COMPANY • 175 MILENS ROAD • TONAWANDA, NEW YORK 14150 • (716) 876-1200

PCB ITEM UNLOAD AUTHORIZATION

GENERATOR _____ TRANSPORTER _____

ADDRESS _____ EPA ID NO. _____

_____ MANIFEST NO. _____

EPA ID NO. _____ DATE _____

PCB ITEMS DUE	INSPECTION CHECK		BY
_____ Drums - Liquid	17E Drums	_____	_____
_____ PCB Level	Leaking	_____	_____
_____ Drums - Solid	17C Drums	_____	_____
_____ Drums - Caps	17C Drums	_____	_____
_____ KVA - Transf.	Serial No.	_____	_____
_____ PCB Level	N/P Gals.	_____	_____
	N/P Weight	_____	

ACTUAL OUTSIDE DIMENSIONS: _____ L _____ W _____ H _____

_____ KVA - Transf.	Serial No.	_____	_____
_____ PCB Level	N/P Gals.	_____	
	N/P Weight	_____	

ACTUAL OUTSIDE DIMENSIONS: _____ L _____ W _____ H _____

_____ KVA - Transf.	Serial No.	_____	_____
_____ PCB Level	N/P Gals.	_____	
	N/P Weight	_____	

ACTUAL OUTSIDE DIMENSIONS: _____ L _____ W _____ H _____

NOTE: Check all items for proper labels.
Record transformer N/P data.
Take and record transformer physical dimensions.

ADDENDUM C

C. WASTE CHARACTERISTICS

1. THRU 9. SEE WASTE CHARACTERISTICS ATTACHED.

10. SEE COPY ASBD HAZARDOUS WASTE MANAGEMENT SYSTEM MANUAL ATTACHED.

I. WASTE CHARACTERISTICS

The hazardous wastes to be managed by the Buffalo Service Shop are:

1. Shop Process Wastes (wastes generated on-site by shop processes)

WASTE STREAM	SHOP PROCESS/LOCATION	PARAMETERS FOR ANALYSIS TO DETERMINE WASTE CHARACTERISTICS*
Sludge	Oil Water Seperator Cleaning Area Sumps	Ignitability (D001) Corrosivity (D002) EP Toxicity (D004 - D011) PCB Total Halogens
Sludge/Waste Water	Water Wash Paint Booth	Ignitability (D001) EP Toxicity (D004 - D011)
Sludge/Waste	Metalizing Exhaust	EP Toxicity (D004 - D011)
Abrasive Blasting Fines	Abrasive Blast Dust Collectors	EP Toxicity (D004 - D011)
Waste Oil (Motor Oil, Lubricating Oil)	Various	PCB EP Toxicity (D004 - D011)

*Selection of the parameters chosen for analysis is based on type of items to be cleaned, cleaning materials used and potential contaminants.

In obtaining samples for above waste analysis, precaution will be taken. The selection of equipment and procedure for obtaining representative samples will be performed in accordance with EPA procedure specified in SW-846 (U. S. Environmental Protection Agency - Test Methods for Evaluating Solid Waste). Additionally, services of a qualified laboratory will be employed to ensure correct sampling.

Analysis for hazardous waste characteristics will be performed in accordance with EPA procedures specified in 40CRF, Part 261.

II. FREQUENCY OF ANALYSIS:

If the analysis shows no hazardous characteristics, then the analysis will be repeated annually or whenever a significant process change occurs (e.g. change of cleaning agent). If hazardous characteristics are identified, then analysis is required each time the material is removed for disposal.

Other hazardous wastes produced by shop processes are:

WASTE MATERIAL	EPA HAZARDOUS WASTE NO.	HAZARD CHARACTERISTICS
Rags, used brushes, other debris soaked with flammable solvent, thinners	D001	Ignitable
Paint and varnish residue	D001	Ignitable
Flammable solvent and thinners	D001	Ignitable
Scrap varnishes	D001	Ignitable

The estimated annual quantity of wastes generated in shop are:

WASTE	QUANITY	UNITS
Sludge (oil water separator, sumps)	1500	Lbs.
Sludge/waste water (water wash paint booth)	1500	Lbs.
Sludge (metalizing exhaust)	100	Lbs.
Abrasive blasting fines (abrasive blast dust collector)	500	Lbs.

WASTE	QUANITY	UNITS
Waste oil (motor/lubricating oil)	1000	Gal.
Rags, used brushes, other debris soaked with flammable solvent, thinners	500	Lbs.
Paint & varnish residue	1500	Lbs.
Flammable solvent and thinners	1000	Gal.
Scrap varnishes	1500	Lbs.

III. PCB ITEMS AND WASTES (generated off-site)

The Buffalo Service Shop received PCB liquids, solids, and articles (New York December Hazardous Waste Numbers B001 through B007) from customers and other General Electric repair facilities for storage prior to shipment to qualified disposal sites.

Test analysis reports for PCB concentration must be received with all shipments of PCB contaminated liquids into the Buffalo Service Shop. Samples of waste analysis information supplied by the generator are attached.

All Electrical equipment containing insulating liquids must be assumed to be PCB contaminated until a sample is obtained by the Buffalo Service Shop and analyzed to determine PCB concentrations prior to shipment to disposal. All solvents used for decontamination of PCB items must be sampled and analyzed for PCB concentration. A test will be performed by electron capture gas chromotography in accordance with the accepted EPA methods.

ACTS TESTING LABS, INC.

3916 Broadway • Buffalo, N.Y. 14227-1192 • (716) 684-3300
120 West 41st Street • New York, N.Y. 10036 • (212) 302-6780

TECHNICAL REPORT 6-0697 February 11, 1986
P.O. # 015-C2911-088

Mr. Anthony Hejmanowski
GENERAL ELECTRIC

SUBJECT:

Hazardous Waste Evaluation of one sample received on January 21, 1986.

INTRODUCTION:

The sample was evaluated for one or more of the Hazardous Waste Characteristics of Ignitability, Corrosivity, Reactivity and EP Toxicity as defined in Title 40, Code of Federal Regulations, Part 261. All analyses were conducted according to "Test Methods for the Evaluation of Solid Waste Physical/ Chemical Methods", EPA.

SAMPLE IDENTIFICATION:

ACTS #	SAMPLE ID
0697	Oil/Water Separator

EXECUTIVE SUMMARY:

The submitted sample EXHIBITS the Hazardous Waste Characteristic of EP Toxicity (Metals Only), due to a lead level which exceed the EPA limit but DOES NOT EXHIBIT the Hazarous Waste Characteristics of Ignitability, Corrosivity, or Reactivity.

ACTS TESTING LABS, INC.

Daniel P. Murtha

Daniel P. Murtha, Ph.D.
Laboratory Director

DPM/sms

RESULTS

A) IGNITABILITY 261.21	Pensky Martens Flash Point, F
Oil/Water Separator, Oil Layer	Greater Than 140 F

B) CORROSIVITY 261.22	pH Units
Oil/Water Separator, Aqueous Layer	6.60

C) REACTIVITY 261.23	Cyanide at pH2	Sulfide at pH2
Oil/Water Separator, Oil Layer	0.88	5.4
Oil/Water Separator, Aqueous Layer	0.04	0.22

In addition, the sample IS stable, DOES NOT react with water and IS NOT capable of detonation. Cyanide and Sulfide results are reported in milligrams per liter (mg/l).

D) EP TOXICITY (261.24)

	Oil/Water Separator	EPA Limit
Arsenic	LT 0.002	5.0
Barium	LT 1.0	100.00
Cadmium	LT 0.09	1.0
Chromium	2.2	5.0
Lead	15.0	5.0
Mercury	LT 0.035	0.2
Selenium	LT 0.002	1.0
Silver	0.08	5.0

LT = Less Than
EP Toxicity results are reported as milligrams of contaminant per liter of leachate.

ADDITIONAL PARAMETERS:

	PCBs, ppm
Oil Water Separator	LT 0.7 as Aroclor 1260

LT = Less Than
ppm = parts per million (ppm) or micrograms per gram (ug/g).

BUFFALO TESTING LABORATORIES
INCORPORATED

CHEMISTS—METALLURGISTS BIOLOGISTS—ENGINEERS

902 Kenmore Ave Buffalo, N.Y. - 14216

Phone AC 716—873-2302

RECEIVED JAN 2 0 1986

Report No.: 82,398
P. O. No.: 015-C2911-116

January 16, 1986

Attn:
General Electric Company
Buffalo Service Shop
175 Milens Road
Tonawanda, NY 14150

Gentlemen:

Following are the results of the tests performed on the specimen which you submitted to us on December 3, 1985.

Specimen Submitted:
Three (3) oil samples identified as:
1) Scrap motor oil sample
2) Scrap XFMR oil sample
3) Scrap, gear, honing and grinder oil sample.

Object: PCB Analysis on all samples. EP Toxicity on sample 3.

BUFFALO TESTING LABORATORIES
INCORPORATED

BUFFALO TESTING LABORATORIES
INCORPORATED
Buffalo, N.Y. 14216

Results:
A) PCB's

Sample ID	PCB's
#1	ND (<10 ppm)
#2	ND (<10 ppm)
#3	ND (<10 ppm)

B) EP Toxicity on Sample #3

Contaiminant	Concentration	Maximum Allowable Concentration (mg/l)
Arsenic	0.017	5.0
Barium	2.52	100.0
Cadmium	<0.002	1.0
Chromium	<0.010	5.0
Lead	33.3	5.0
Mercury	<0.0002	0.2
Selenium	<0.010	1.0
Silver	<0.010	5.0

Very truly yours,
BUFFALO TESTING LABORATORIES, INC.

Daniel T. Urbanczyk

DANIEL T. URBANCZYK

BUFFALO TESTING LABORATORIES
INCORPORATED

CHEMISTS—METALLURGISTS BIOLOGISTS—ENGINEERS

902 Kenmore Ave. Buffalo, N.Y. - 14216

Phone: AC 716—873-2302

Report No.: 82,724
P. O. No.: 015 C2911-009

March 14, 1986

Attn:
General Electric Company
Buffalo Service Shop
175 Milens Road
Tonawanda, NY 14150

Gentlemen:

Following are the results of the tests performed on the specimen which you submitted to us on February 7, 1986.

Specimen Submitted: One (1) Steam Booth Sump liquid/sludge sample.

Object: Test for PCB content, RCRA test, and if PCB content is less thatn 50ppm, test for halogonated solvents.

BUFFALO TESTING LABORATORIES
INCORPORATED

BUFFALO TESTING LABORATORIES
INCORPORATED
Buffalo, N.Y. 14216

Results:

Arsenic,ppm	<0.025
Barium,ppm	1.00
Cadmium,ppm	0.049
Chromium,ppm	<0.010
Copper,ppm	0.013
Lead,ppm	0.028
Mercury,ppm	<0.0002
Nickel,ppm	0.640
Selenium,ppm	<0.005
Silver,ppm	<0.010
Zinc,ppm	17.6
PCB's,ppm	<1.0
Cyanides,ppm	<0.20
Sulfides,ppm	4.0

Ignitibility Flash Point >140 Degrees F

Corrosivity: Non-Corrosive.....2.0<pH<12.5 (pH 5% Slurry 7.0)

All Halogenated Organics (EPA 601 Series) <1.0ppb.

Very truly yours,
BUFFALO TESTING LABORATORIES, INC.

Edward J Kris

EDWARD J. KRIS

BUFFALO TESTING LABORATORIES
INCORPORATED

CHEMISTS—METALLURGISTS BIOLOGISTS—ENGINEERS

902 Kenmore Ave Buffalo, N.Y. - 14216

Phone: AC 716—873-2302

Report No.: 83,273
P. O. No.: 015 C1600 31372

May 12, 1986

Attn: Mr. Heymanowski
General Electric Company
175 Milens Road
Tonawanda, NY 14150

Gentlemen:

Following are the results of the tests performed on the specimen which you submitted to us on May 7, 1986.

Specimen Submitted: One (1) 10C oil sample.

Object: PCB Analysis.

Method: Gas Chromatography.

Results:
No PCB's (<10 ppm) were detected in the sample.

Very truly yours,
BUFFALO TESTING LABORATORIES, INC.

Daniel T. Urbanczyk
DANIEL T. URBANCZYK

BUFFALO TESTING LABORATORIES
INCORPORATED

MBP — 67

Apparatus & Engineering Services

HAZARDOUS WASTE MANAGEMENT MANUAL

This Manual Assigned to:

COMPANY PROPRIETARY INFORMATION

DN-410

GENERAL ELECTRIC

APPARATUS & ENGINEERING SERVICES

Hazardous Waste Management Manual

NOTICE OF INTENT

The Hazardous Work Management Manual is assigned to selected Apparatus & Engineering Services (A&ES) personnel for their use in the proper performance of assigned work activities for specific positions, and is not intended for use as general industry information. The purpose of the manual is to delineate responsibilities and to provide procedures necessary for effective administration of the A&ES hazardous waste programs.

This manual is considered "Company Proprietary Information" and is restricted to use by General Elecric Company personnel only. It shall not be read by, copied for, or released to non-General Electric Company personnel without the express permission of the Manager, Health and Environmental Protection. The employees to whom this manual is assigned will be held personally responsible for maintaining, safeguarding, and controlling the use of the manual's contents.

This document is the property of A&ES and must be returned to the Company upon request, or when its custodian obtains a different position, or when its custodian leaves A&ES employment.

IF THIS MANUAL IS LOST, PLEASE RETURN TO:

Distribution Control Specialist
General Electric Co.
1 River Road, Bldg. 2-111B
Schenectady, New York 12345

GENERAL ELECTRIC

HAZARDOUS WASTE MANAGEMENT SYSTEM

INTRODUCTION

This Guide has been developed to help you understand and comply with the EPA issued regulations for the management of Hazardous Wastes as stated in the Resource Conservation and Recovery Act (RCRA). The general topics covered include:

- Hazardous Waste Analysis
- Facility Requirements
- Shop Floor Control
- Waste Minimization
- Inspection
- Pre-Transport Requirements
- Manifest System
- Contingency Plan and Emergency Procedures
- Closure and Post Closure
- Training
- Records and Reporting

For your convenience, a tab entitled "Additional Information" has also been included. You are encouraged to file all material pertinent to RCRA and the Hazardous Waste Management System, including communications from Headquarters, in this section.

This "Checklist" is provided to help you keep your Manual current with all sections in their latest revisions, and to serve directly as a convenient order form for missing sections.

TAB	Title	Document No.	Rev.	In Manual Yes	In Manual No
	TITLE PAGE/NOTICE OF INTENT	--	--	___	___
	INTRODUCTION	--	--	___	___
	CONTENTS CHECKLIST	HW-ASD-0.1	0	___	___
1	HAZARDOUS WASTE ANALYSIS	--	--	___	___
	Hazardous Waste Analysis	HW-ASD-0.1	0	___	___
	RCRA Hazardous Wastes	Exhibit 1	--	___	___
	Service Shop Hazardous Waste Materials	Exhibit 2	--	___	___
	Hazardous Waste Substance List - EPA "U" Numbers	Exhibit 3	--	___	___
	Discarded Commercial Chemical Products, Off-Specification Species, Containers, and Spill Residues Thereof	Exhibit 4	--	___	___
	Hazardous Information Request (Sample)	Exhibit 5	--	___	___
	Hazardous Waste Analysis Plan	Exhibit 6	--	___	___
2	FACILITY REQUIREMENTS	--	--	___	___
	Facility Requirements	HW-ASD-2.1	0	___	___

TAB	Title	Document No.	Rev.	In Manual? Yes	No
7	MANIFEST SYSTEM	--	--	___	___
	Manifest System	HW-ASD-7.1	0	___	___
	Uniform Hazardous Waste Manifest	Exhibit 1	--	___	___
8	CONTINGENCY PLAN	--	--	___	___
	Contingency Plan and Emergency Procedures	HW-ASD-8.1	0	___	___
	Contingency Plan and Emergency Procedures Plan	Exhibit 1	--	___	___
	Service Shop Emergency Procedures	Exhibit 2	--	___	___
9	CLOSURE PLAN	--	--	___	___
	Closure Plan	HW-ASD-9.1	0	___	___
	Closure Plan	Exhibit 1	--	___	___
10.	TRAINING	--	--	___	___
	Training	HW-ASD-10.1	0	___	___
	Hazardous Waste Management Responsibility and Training	Exhibit 1	--	___	___
11	RECORDS AND REPORTING	--	--	___	___
	Records and Reporting	HW-ASD-11.1	0	___	___
	Hazardous Waste Management Operating Record	Exhibit 1	--	___	___
12	ADDITIONAL INFORMATION	--	--	___	___

If this Checklist indicates any material is missing from your Manual, use a copy of this Checklist directly as an order form for any missing Sections.

Distribution Services
General Electric Co.
Building 705
Corporation Park
Scotia, NY 12302

Requested by: _____

Address: _____

_____

_____

Date: _____

640G

I. GENERAL

Each service shop is responsible for identifying Hazardous Wastes from among all wastes it generates. To identify and classify hazardous wastes, each service shop must (1) identify all stock materials used in the shop that would become hazardous wastes when discarded, and (2) identify all hazardous wastes that are produced in the shop.

II. HAZARDOUS WASTE IDENTIFICATION -- STOCK MATERIALS

A. The following guidelines should be used to identify stock materials that will become hazardous wastes when discarded.

1. Is it a substance identified in EPA Hazardous Waste Number lists with P or U numbers as shown in Exhibits 2, 3, and 4?

   Substances identified by U numbers must be pure commercial products (whether sold by generic or brand name). Compounds containing these substances should not be identified by a U number, although they may be included in another classification of Hazardous Waste.

2. Is it a substance (spent solvent) identified in the EPA Hazardous waste list with an F number as shown in Exhibit 1?

3. If the substance does not have a P, U or F number, is it identified by one of the following hazardous characteristics?

   a. Ignitable (see definition, Exhibit 1) Code D001. Flash Point < 140°F.

   b. Corrosive (see definition, Exhibit 1) Code D002. pH < 2 or > 12.5.

   c. Reactive (see definition, Exhibit 1) Code D003.

   d. EP toxicity (see definition, Exhibit 1) Code D004 through D017. Heavy metals.

4. If the answers to <u>each</u> of the above questions are no, then the material would not be classified as a Hazardous Waste.

B. Exhibit 1 provides a summary of EPA Hazardous Waste Number classifications and their definitions.

C. Exhibit 2 contains a list of stock materials used in sampled service shops and their EPA Hazardous Waste Numbers. Since it is not a complete list of stock materials used in service shops, Exhibit 2 should be used to perform only an initial evaluation of the stock materials used in a shop.

D. Exhibits 3 and 4 contain lists of hazardous waste substances identified by EPA Hazardous Waste U and P numbers, respectively.

U numbers are commercial chemical products or manufacturing chemical intermediates identified by the EPA as toxic wastes (T) unless otherwise designated. P numbers are commercial chemical products or manufacturing chemical intermediates identified by the EPA as acute hazardous wastes (H).

E. Additional sources for identifying the hazardous characteristics or constituents of stock materials purchased by service shops include the following.

1. General Electric Material Safety Data Manual

Order from: Genium Publishing Company
Attn: Sales Department
1145 Catalyn Street
Schenectady, New York 12303

2. Manufacturers' Material Safety Data Sheets

Contact vendor (see Exhibit 5).

III. HAZARDOUS WASTE IDENTIFICATION -- MATERIALS PRODUCED IN SERVICE SHOPS

A. The following guidelines should be used to identify hazardous wastes produced in service shops.

1. Is the substance identified by one of the following classifications?

a. Ignitable (see definition, Exhibit 1) Code D001.

Rags, used brushes, or other debris soaked with flammable solvent, thinners, etc., are classified as ignitable solids, Code D001. (They are not classified by the F, P, or U numbers of the soaking substance.)

b. Corrosive (see definition, Exhibit 1) Code D002.

Steam cleaning sludge may be corrosive.

c. EP Toxicity (see definition, Exhibit 1) Code D004 through D017.

This classification may include waste water streams or sludges resulting from steam cleaning or metalizing exhausts. The dust resulting from abrasive blasting may also exceed limits for EP Toxicity.

2. Is it a substance identified in EPA Hazardous Waste Number lists with an F number? F numbers apply to spent and contaminated cleaning solvents and thinners.

B. Identification of hazardous materials produced in shops may require chemical and physical analysis. Materials requiring such analysis include:

1. Sludge from steam cleaning pits and oil/water separators.

2. Sludge from water wash spray booths and wet collectors used for metalizing.

3. Mixed solvents where the quantities of the constituents are unknown.

4. Abrasive blasting dust.

IV. HAZARDOUS WASTE ANALYSIS PLAN

A. Each Service Shop must establish and maintain a written hazardous waste analysis plan. This plan will include the following information:

1. Individuals(s) responsible for the analysis of materials used or produced by the shop.

2. Types and locations of materials requiring analysis.

3. Analysis methods used to identify hazardous wastes.

B. A typical Hazardous Waste Analysis Plan is shown in Exhibit 6.

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EXHIBIT 1 - HW-ASD-1.1

RCRA HAZARDOUS WASTES

A waste material is considered hazardous if it has any of the following characteristics.

EPA HAZARDOUS WASTE NUMBER	CHARACTERISTIC	DEFINITION
D001	Ignitability	A liquid with flash point less than 140°F. A solid that causes fires through friction, absorption of moisture, or spontaneous combustion. An oxidizer.
D002	Corrosivity	A liquid having a pH less than 2 or greater than 12.5. Corrodes SAE 1020 steel at a rate greater than .250 inches per year.
D003	Reactivity	Material is normally unstable and explodes easily. It forms toxic gases or vapors when exposed to water, mild acid, or mild basic solutions.
D004 through D017	EP Toxicity	When the waste material is subjected to the EP Toxicity Test procedure, EP Toxicity exists if any of the following contaminants are present in the waste material at a concentration equal to or greater than the maximum value listed below.

No.	Contaminant	Maximum Concentration (milligrams per liter)
D004	Arsenic	5.0
D005	Barium	100.0
D006	Cadmium	1.0
D007	Chromium	5.0
D008	Lead	5.0
D009	Mercury	0.2
D010	Selenium	1.0
D011	Silver	5.0

D012 through D017		These EPA Hazardous Waste Numbers correspond to concentrations for pesticides that would not normally be found in service shops.

Hazardous Waste from Nonspecific Sources

(EPA Hazardous Waste Numbers F001 through F028.) The following apply to service shop operations.

§ 261.31 Hazardous waste from nonspecific sources.

Industry and EPA hazardous waste No.	Hazardous waste	Hazard code

[45 FR 74884, Nov. 12, 1980; 46 FR 27473, May 20, 1981; 49 FR 5308, Feb. 10, 1984; 50 FR 663, Jan. 4, 1985; 50 FR 1978, Jan. 14, 1985, *effective* July 15, 1985; 50 FR 53315, Dec. 31, 1985, *effective* Jan. 30, 1986; 51 FR 6537, Feb. 25, 1986, effective Aug. 25, 1986]

Industry and EPA hazardous waste No.	Hazardous waste	Hazard code
Generic:		
F001	The following spent halogenated solvents used in degreasing: tetrachloroethylene, trichloroethylene, methylene chloride, 1,1,1-trichloroethane, carbon tetrachloride, and chlorinated fluorocarbons; all spent solvent mixtures/blends used in degreasing containing, before use, a total of ten percent or more (by volume) of one or more of the above halogenated solvents or those solvents listed in F002, F004, and F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures. [50 FR 53315, Dec. 31, 1985, effective Jan. 30, 1986]	(T)
F002	The following spent halogenated solvents: tetrachloroethylene, methylene chloride, trichloroethylene, 1,1,1-trichloroethane, chlorobenzene, 1,1,2-trichloro-1,2,2-trifluoroethane, ortho-dichlorobenzene, trichlorofluoromethane and 1,1,2-trichloroethane; all spent solvent mixtures/blends containing, before use, a total of ten percent or more (by volume) of one or more of the above halogenated solvents or those solvents listed in F001, F004, and F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures. [50 FR 53315, Dec. 31, 1985, effective Jan. 30, 1986; 51 FR 2702, Jan. 21, 1986; 51 FR 6537, Feb. 25, 1986, effective Aug. 25, 1986]	(T)
F003	The following spent non-halogenated solvents: xylene, acetone, ethyl acetate, ethyl benzene, ethyl ether, methyl isobutyl ketone, n-butyl alcohol, cyclohexanone, and methanol; all spent solvent mixtures/blends containing, before use, only the above spent non-halogenated solvents; and all spent solvent mixtures/blends containing, before use, one or more of the above non-halogenated solvents, and, a total of ten percent or more (by volume) of one or more of those solvents listed in F001, F002, F004, and F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures. [50 FR 53315, Dec. 31, 1985, effective Jan. 30, 1986]	(I)*
F004	The following spent non-halogenated solvents: cresols and cresylic acid, and nitrobenzene; all spent solvent mixtures/blends containing, before use, a total of ten percent or more (by volume) of one or more of the above non-halogenated solvents or those solvents listed in F001, F002, and F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures. [50 FR 53315, Dec. 31, 1985, effective Jan. 30, 1986]	(T)
F005	The following spent non-halogenated solvents: toluene, methyl ethyl ketone, carbon disulfide, isobutanol, pyridine, benzene, 2-ethoxyethanol, and 2-nitropropane; all spent solvent mixtures/blends containing, before use, a total of ten percent or more (by volume) of one or more of the above non-halogenated solvents or those solvents listed in F001, F002, and F004; and still bottoms from the recovery of these spent solvents and spent solvent mixtures. [50 FR 53315, Dec. 31, 1985, effective Jan. 30, 1986; 51 FR 2702, Jan. 21, 1986; 51 FR 6537, Feb. 25, 1986, effective Aug. 25, 1986]	(I,T)

Hazardous Wastes From Specific Sources

(EPA hazardous waste numbers K001 through K102.) These numbers are not applicable to service shop operations.

Acute Hazardous Wastes

(EPA hazardous waste numbers P001 through P122.)

Very few materials used in the service shops are identified by these numbers. However, some possible wastes are cynides used for plating operation and any pesticides or herbicides used in the shops. Each service shop should review this list and insure then when materials identified by the number are used, they are properly identified.

Commercial Chemical Products

(EPA hazardous waste numbers U001 through U239.) Many of these materials are utilized in service shop operations, and some are identified in the attached Service Shop Hazardous Waste Material Listings (Exhibit 2).

EXHIBIT 2 - HW-ASD-1.1

SERVICE SHOP HAZARDOUS WASTE MATERIALS

Description	Vendor	EPA Hazardous Waste No.*		
Solvents & thinners		A	B	C
Acetone		D001	F003	D001
Cellosolve		D001		D001
Chlorothene NU		U226	F001	
Chlorothene VG		U226	F001	
Denatured alcohol/ethyl alcohol		D001		D001
Kerosene		D001		D001
Methyl-ethyl-ketone (MEK)		U159	F005	D001
Methylene Chloride		U080	F001	
Naptha (HI flash)			F003	
Naptha (VM&P)		D001		D001
Perchlor		U210	F001	
Perchloethylene		U210	F001	
Perclene		U210	F001	
Perk		U210	F001	
Safety Cleaner 150		U226	F001	
Toluol, Toluene		U220	F005	D001
Triethane III		U226	F001	
Trichloroethane III		U226	F001	
1,1,1- Trichloroethane		U226	F001	
1,1,2- Trichloroethane		U227		
Trichloroethylene		U228	F001	
Varsol		D001		D001
Xylene, Xylol		U239	F003	D001
SE75	Productive Chemicals		F001	
676	Penetone Co.		F001	
AP755	Inland Chemical Co.		F001	
Solute 2101	Penetone Co.		F001	
1500 Thinner	(GE)	D001	F003	D001
1511 F Thinner	(GE)	D001	F003	D001
1511 M Thinner	(GE)	D001	F003	D001
1514 Lacquer Thinner	(GE)	D001		D001
6442 Thinner	(GE)	D001		D001
9424 Thinner	(GE)	D001	F005	D001
75029 Thinner	(GE)	D001		D001

*Certain Hazardous Wastes may be identified by more than one Hazardous Waste No., depending upon the form in which it is found.
Column A applies to residual (leftover) solvents & thinners being scrapped.
Column B applies to spent solvents taken from cleaning tanks.
Column C applies to solvent and thinner soaked rags, spill clean ups, etc.

EXHIBIT 2 - HW-ASD-1.1
(Continued)

SERVICE SHOP HAZARDOUS WASTE MATERIALS

Description	Vendor	EPA Hazardous Waste No.
Paints & Varnishes		
CE 237 Insulating Paint	GE	D001
271 Black Spirit Varnish	GE	D001
462 Air Dry Varnish	GE	D001
701 Varnish (Pour Thru)	GE	D001
702 Varnish (VPI)	GE	D001
704 Varnish (Pour Thru)	GE	D001
707 Varnish (VPI)	GE	D001
1202 Air Dry Varnish	GE	D001
3285 Sealing Compound	GE	D001
7710 Baking Primer	GE	D001
7920 Primer	GE	D001
8001 Insulating Paint	GE	D001
8012 Baking Enamel	GE	D001
9077 Paint	GE	D001
9522 Insulating Varnish	GE	D001
9637 Insulating Varnish	GE	D001
9637AP Insulating Varnish	GE	D001
9921 Semi-Conducting Paint	GE	D001
73517 Varnish	GE	D001
74004 Insulating Paint	GE	D001
74010 Epoxy Varnish	GE	D001

SERVICE SHOP HAZARDOUS WASTE MATERIALS

Description	Vendor	EPA Hazardous Waste No.
Adhesives & Epoxies		
1276 Cement	GE (IMD)	D001
1286 Cement	GE (IMD)	D001
7057 Cement	GE (IMD)	D001
880 Gasket Cement	GE (IMD)	D001
Pliobond	Goodyear	D001
3060 Casting Epoxy (Part B)	Astro Chemical	D002
3093 Sprayable Epoxy (Part B)	Astro Chemical	D002
5003 Epoxy Cement	Astro Chemical	D002
2861 Permafil	Astro Chemical	D001
3332 Permafil Catalyst	GE (IMD)	D001
9858 Catalyst	GE (IMD)	D001
Fluxes (Soldering and Brazing)		
X-25 Soldering Flux	Ames Metal Products Chicago, Ill.	D001
294 (EMPIS A10B23) Soldering Flux	General Electric Company	D002
115-5-51 (EMPIS A10A1) Soldering Flux	General Electric Company	D001
Stainless Steel Soldering Flux	Johnson's Lloyd's	D002
Acids		
Hydrochloric Acid	Hellige Inc.	D002
Hydrochloric Acid	Baker	D002
Phosphoric Acid		D002
Nitric Acid		D002
Sulfuric Acid		D002
Caustic & Alkaline Cleaners		
215D Magnus Cleaner	Magnus	D002
114 Magnus Cleaner	Magnus	D002
147x Magnus Cleaner	Magnus	D002
26 N Magnus Cleaner	Magnus	D002
92S Magnus Cleaner	Magnus	D002
92 xx Magnus Cleaner	Magnus	D002

SERVICE SHOP HAZARDOUS WASTE MATERIALS

Description	Vendor	EPA Hazardous Waste No.
NDT Materials		
SKC-NF Cleaner/Remover	Magnaflux Co.	F002
ZP-9 Zyglo Form B developer	Magnaflux Co.	F002
ZC-7 Zyglo Form B cleaner/remover	Magnaflux Co.	F002
14AM Magna Glo prepared bath	Magnaflux Co.	D001
Miscellaneous		
Insulation, xformer leads (clear & dark)	Epoxylite	D001
SS-3 Stainless Steel Clean.	Bradford DeRustit	D002
3068 Texo-Brite (Chromic Acid Solution)	Texo Corp.	D002
Ferric Chloride (Powder)	Baker Chemical	D002
Cupric Sulfate (Powder)	Baker Chemical	D002
PH 6297 Rust Ban	Exxon-Matcote	D001
EE6565 Rust Ban	Dow/Matcote	D001
Formic Gel	Gen. Elec. (Pittsfield)	D002
#2 Form-A-Gasket Cement	Permatex	D001
65382 Battery Cleaner	KAR Products	D001
65376 Silicone Lube	KAR Products	D001
65379 White Grease	KAR Products	D001
69954 Open Gear Lube	KAR Products	D001
Butyl Alcohol		U031
Aqua Ammonia 26	Ashland Chemical	D002
Rapid Fixer Solution A	Eastman Kodak	D002
Rapid Fixer Solution B	Eastman Kodak	D002
Rust-I-Cide	Skybryte Co.	D002
Klean Crete	Klean Strip Co.	D002
Ammonium Hydroxide	Mallinckrodt Chemical	D002

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EXHIBIT 3 - HW-ASD-1.1

HAZARDOUS WASTE SUBSTANCE LIST

EPA "U" NUMBERS

261.33(f) Table

Hazardous Waste No.	Substance
U001	Acetaldehyde (I)
U034	Acetaldehyde, trichloro-
U187	Acetamide, N-(4-ethoxyphenyl)-
U005	Acetamide, N-9H-fluoren-2-yl-
U112	Acetic acid, ethyl ester (I)
U144	Acetic acid, lead salt
U214	Acetic acid, thallium(I) salt
U003	Acetonitrile (I, T)
U248	3(alpha-Acetonylbenzyl)-4-hydroxy-coumarin and salts, when present at concentrations greater than 0.3%.
[49 FR 19922, May 10, 1984; effective November 12, 1984]	
U004	Acetophenone
U006	2-Acetylaminofluorene
U006	Acetyl chloride (C,R,T)
U007	Acrylamide
U008	Acrylic acid (I)
U009	Acrylonitrile
U150	Alanine, 3-[p-bis(2-chloroethyl)amino] phenyl-, L-
U328	2-Amino-1-methylbenzene[2]
U353	4-Amino-1-methylbenzene[2]
U011	Amitrole
U012	Aniline (I,T)
U014	Auramine
U015	Azaserine
U010	Azirino(2',3':3,4)pyrrolo(1,2-a)indole-4,7-dione, 6-amino-8-[[(aminocarbonyl)oxy]methyl]-1,1a,2,8,8a,8b-hexahydro-8a-methoxy-5-methyl-
U157	Benz[j]aceanthrylene, 1,2-dihydro-3-methyl-
U016	Benz[c]acridine
U016	3,4-Benzacridine
U017	Benzal chloride
U018	Benz[a]anthracene
U018	1,2-Benzanthracene
U094	1,2-Benzanthracene, 7,12-dimethyl-
U012	Benzenamine (I,T)
U014	Benzenamine, 4,4'-carbonimidoylbis[N,N-dimethyl-
U049	Benzenamine, 4-chloro-2-methyl-
U093	Benzenamine, N,N-dimethyl-4-(phenylazo)
U158	Benzenamine, 4,4'-methylenebis(2-chloro-
U222	Benzenamine, 2-methyl-, hydrochloride
U181	Benzenamine, 2-methyl-5-nitro
U019	Benzene (I,T)
U038	Benzeneacetic acid, 4-chloro-alpha-(4-chlorophenyl)-alpha-hydroxy, ethyl ester
U030	Benzene, 1-bromo-4-phenoxy-
U037	Benzene, chloro-
U190	1,2-Benzenedicarboxylic acid anhydride
U028	1,2-Benzenedicarboxylic acid, [bis(2-ethyl-hexyl)] ester
U069	1,2-Benzenedicarboxylic acid, dibutyl ester
U088	1,2-Benzenedicarboxylic acid, diethyl ester
U102	1,2-Benzenedicarboxylic acid, dimethyl ester
U107	1,2-Benzenedicarboxylic acid, di-n-octyl ester
U070	Benzene, 1,2-dichloro-
U071	Benzene, 1,3-dichloro-
U072	Benzene, 1,4-dichloro-
U017	Benzene, (dichloromethyl)-
U223	Benzene, 1,3-diisocyanatomethyl- (R,T)
U239	Benzene, dimethyl- (I,T)
U201	1,3-Benzenediol
U127	Benzene, hexachloro-
U056	Benzene, hexahydro- (I)
U188	Benzene, hydroxy-
U220	Benzene, methyl-
U105	Benzene, 1-methyl-2,4-dinitro-
U106	Benzene, 1-methyl-2,6-dinitro-
U203	Benzene, 1,2-methylenedioxy-4-allyl-
U141	Benzene, 1,2-methylenedioxy-4-propenyl-
U090	Benzene, 1,2-methylenedioxy-4-propyl-
U055	Benzene, (1-methylethyl)- (I)
U169	Benzene, nitro- (I,T)
U183	Benzene, pentachloro
U185	Benzene, pentachloronitro-
U020	Benzenesulfonic acid chloride (C,R)
U020	Benzenesulfonyl chloride (C,R)
U207	Benzene, 1,2,4,5-tetrachloro-
U023	Benzene, (trichloromethyl)-(C,R,T)
U234	Benzene, 1,3,5-trinitro- (R,T)
U021	Benzidine
U202	1,2-Benzisothiazolin-3-one, 1,1-dioxide, and salts
U120	Benzo[j,k]fluorene
U022	Benzo[a]pyrene
U022	3,4-Benzopyrene
U197	p-Benzoquinone
U023	Benzotrichloride (C,R,T)
U050	1,2-Benzphenanthrene
U085	2,2'-Bioxirane (I,T)
U021	[1,1'-Biphenyl]-4,4'-diamine
U073	[1,1'-Biphenyl]-4,4'-diamine, 3,3'-dichloro-
U091	[1,1'-Biphenyl]-4,4'-diamine, 3,3'-dimethoxy-
U095	[1,1'-Biphenyl]-4,4'-diamine, 3,3'-dimethyl-
U024	Bis(2-chloroethoxy) methane
U027	Bis(2-chloroisopropyl) ether
U244	Bis(dimethylthiocarbamoyl) disulfide
U028	Bis(2-ethylhexyl) phthalate
U246	Bromine cyanide
U225	Bromoform
U030	4-Bromophenyl phenyl ether
U128	1,3-Butadiene, 1,1,2,3,4,4-hexachloro-
U172	1-Butanamine, N-butyl-N-nitroso-
U035	Butanoic acid, 4-[bis(2-chloroethyl)amino] benzene-
U031	1-Butanol (I)
U159	2-Butanone (I,T)
U160	2-Butanone peroxide (R,T)
U053	2-Butenal
U074	2-Butene, 1,4-dichloro- (I,T)
U031	n-Butyl alchohol (I)
U136	Cacodylic acid
U032	Calcium chromate
U238	Carbamic acid, ethyl ester
U178	Carbamic acid, methylnitroso-, ethyl ester
U176	Carbamide, N-ethyl-N-nitroso-
U177	Carbamide, N-methyl-N-nitroso-
U219	Carbamide, thio-
U097	Carbamoyl chloride, dimethyl-
U215	Carbonic acid, dithallium(I) salt
U156	Carbonochloridic acid, methyl ester (I,T)
U033	Carbon oxyfluoride (R,T)
U211	Carbon tetrachloride
U033	Carbonyl fluoride (R,T)
U034	Chloral
U035	Chlorambucil
U036	Chlordane, technical
U026	Chlornaphazine
U037	Chlorobenzene
U039	4-Chloro-m-cresol
U041	1-Chloro-2,3-epoxypropane
U042	2-Chloroethyl vinyl ether
U044	Chloroform
U046	Chloromethyl methyl ether
U047	beta-Chloronaphthalene
U048	o-Chlorophenol
U049	4-Chloro-o-toluidine, hydrochloride
U032	Chromic acid, calcium salt
U050	Chrysene
U051	Creosote
U052	Cresols
U052	Cresylic acid
U053	Crotonaldehyde
U055	Cumene (I)
U246	Cyanogen bromide
U197	1,4-Cyclohexadienedione
U056	Cyclohexane (I)
U057	Cyclohexanone (I)
U130	1,3-Cyclopentadiene, 1,2,3,4,5,5-hexachloro-
U058	Cyclophosphamide
U240	2,4-D, salts and esters
U059	Daunomycin
U060	DDD
U061	DDT
U142	Decachlorooctahydro-1,3,4-metheno-2H-cyclobuta[c,d]-pentalen-2-one
U062	Diallate
U133	Diamine (R,T)
U221	Diaminotoluene
U063	Dibenz[a,h]anthracene
U063	1,2:5,6-Dibenzanthracene
U064	1,2:7,8-Dibenzopyrene
U064	Dibenz[a,i]pyrene
U066	1,2-Dibromo-3-chloropropane
U069	Dibutyl phthalate
U062	S-(2,3-Dichloroallyl) diisopropylthiocarbamate
U070	o-Dichlorobenzene
U071	m-Dichlorobenzene
U072	p-Dichlorobenzene
U073	3,3'-Dichlorobenzidine
U074	1,4-Dichloro-2-butene (I,T)
U075	Dichlorodifluoromethane
U192	3,5-Dichloro-N-(1,1-dimethyl-2-propynyl) benzamide
U060	Dichloro diphenyl dichloroethane
U061	Dichloro diphenyl trichloroethane
U078	1,1-Dichloroethylene
U079	1,2-Dichloroethylene
U025	Dichloroethyl ether
U081	2,4-Dichlorophenol
U082	2,6-Dichlorophenol
U240	2,4-Dichlorophenoxyacetic acid, salts and esters
U083	1,2-Dichloropropane
U084	1,3-Dichloropropene
U085	1,2:3,4-Diepoxybutane (I,T)
U108	1,4-Diethylene dioxide
U086	N,N-Diethylhydrazine
U087	O,O-Diethyl-S-methyl-dithiophosphate
U088	Diethyl phthalate
U089	Diethylstilbestrol
U148	1,2-Dihydro-3,6-pyridizinedione
U090	Dihydrosafrole
U091	3,3'-Dimethoxybenzidine
U092	Dimethylamine (I)
U093	Dimethylaminoazobenzene
U094	7,12-Dimethylbenz[a]anthracene
U095	3,3'-Dimethylbenzidine
U096	alpha,alpha-Dimethylbenzylhydroperoxide (R)
U097	Dimethylcarbamoyl chloride
U098	1,1-Dimethylhydrazine
U099	1,2-Dimethylhydrazine
U101	2,4-Dimethylphenol
U102	Dimethyl phthalate
U103	Dimethyl sulfate
U105	2,4-Dinitrotoluene
U106	2,6-Dinitrotoluene
U107	Di-n-octyl phthalate
U108	1,4-Dioxane
U109	1,2-Diphenylhydrazine
U110	Dipropylamine (I)
U111	Di-n-propylnitrosamine
U001	Ethanal (I)
U174	Ethanamine, N-ethyl-N-nitroso-
U067	Ethane, 1,2-dibromo-
U076	Ethane, 1,1-dichloro-
U077	Ethane, 1,2-dichloro-
U114	1,2-Ethanediylbiscarbamodithioic acid
U131	Ethane, 1,1,1,2,2,2-hexachloro-
U024	Ethane, 1,1'-[methylenebis(oxy)]bis[2-chloro-
U247	Ethane, 1,1,1-trichloro-2,2-bis(p-methoxy phenyl)

[261.33(f) table]

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261.33(f) Table

Hazardous Waste No.	Substance
U003	Ethanenitrile (I, T)
U117	Ethane,1,1'-oxybis- (I)
U025	Ethane, 1,1'-oxybis[2-chloro-
U184	Ethane, pentachloro-
U208	Ethane, 1,1,1,2-tetrachloro-
U209	Ethane, 1,1,2,2-tetrachloro-
U218	Ethanethioamide
U227	Ethane, 1,1,2-trichloro-
U043	Ethene, chloro-
U042	Ethene, 2-chloroethoxy-
U078	Ethene, 1,1-dichloro-
U079	Ethene, trans-1,2-dichloro-
U210	Ethene, 1,1,2,2-tetrachloro-
U173	Ethanol, 2,2'-(nitrosoimino)bis-
U004	Ethanone, 1-phenyl-
U006	Ethanoyl chloride (C,R,T)
U359	2-Ethoxyethanol.[3]
U112	Ethyl acetate (I)
U113	Ethyl acrylate (I)
U238	Ethyl carbamate (urethan)
U038	Ethyl 4,4'-dichlorobenzilate
U114	Ethylenebis(dithiocarbamic acid)
U067	Ethylene dibromide
U077	Ethylene dichloride
U359	Ethylene glycol monethyl ether[3]
U115	Ethylene oxide (I, T)
U116	Ethylene thiourea
U117	Ethyl ether (I)
U076	Ethylidene dichloride
U118	Ethyl methacrylate
U119	Ethyl methanesulfonate
U139	Ferric dextran
U120	Fluoranthene
U122	Formaldehyde
U123	Formic acid (C,T)
U124	Furan (I)
U125	2-Furancarboxaldehyde (I)
U147	2,5-Furandione
U213	Furan, tetrahydro- (I)
U125	Furfural (I)
U124	Furfuran (I)
U206	D-Glucopyranose, 2-deoxy-2(3-methyl-3-nitrosoureido)-
U126	Glycidylaldehyde
U163	Guanidine, N-nitroso-N-methyl-N'nitro-
U127	Hexachlorobenzene
U128	Hexachlorobutadiene
U129	Hexachlorocyclohexane (gamma isomer)
U130	Hexachlorocyclopentadiene
U131	Hexachloroethane
U132	Hexachlorophene
U243	Hexachloropropene
U133	Hydrazine (R,T)
U086	Hydrazine, 1,2-diethyl-
U098	Hydrazine, 1,1-dimethyl-
U099	Hydrazine, 1,2-dimethyl-
U109	Hydrazine, 1,2-diphenyl-
U134	Hydrofluoric acid (C,T)
U134	Hydrogen fluoride (C,T)
U135	Hydrogen sulfide
U096	Hydroperoxide, 1-methyl-1-phenylethyl- (R)
U136	Hydroxydimethylarsine oxide
U116	2-Imidazolidinethione
U137	Indeno[1,2,3-cd]pyrene
U139	Iron dextran
U140	Isobutyl alcohol (I,T)
U141	Isosafrole
U142	Kepone
U143	Lasiocarpine
U144	Lead acetate
U145	Lead phosphate
U146	Lead subacetate
U129	Lindane
U147	Maleic anhydride
U148	Maleic hydrazide
U149	Malononitrile
U150	Melphalan
U151	Mercury
U152	Methacrylonitrile (I,T)
U092	Methanamine, N-methyl- (I)
U029	Methane, bromo-
U045	Methane, chloro- (I,T)
U046	Methane, chloromethoxy-
U068	Methane, dibromo-
U080	Methane, dichloro-
U075	Methane, dichlorodifluoro-
U138	Methane, iodo-
U119	Methanesulfonic acid, ethyl ester
U211	Methane, tetrachloro-
U121	Methane, trichlorofluoro-
U153	Methanethiol (I,T)
U225	Methane, tribromo-
U044	Methane, trichloro-
U121	Methane, trichlorofluoro-
U123	Methanoic acid (C,T)
U036	4,7-Methanoindan, 1,2,4,5,6,7,8,8-octachloro-3a,4,7,7a-tetrahydro-
U154	Methanol (I)
U155	Methapyrilene
U154	Methyl alcohol (I)
U029	Methyl bromide
U186	1-Methylbutadiene (I)
U045	Methyl chloride (I,T)
U156	Methyl chlorocarbonate (I,T)
U226	Methylchloroform
U157	3-Methylcholanthrene
U158	4,4'-Methylenebis(2-chloroaniline)
U132	2,2'-Methylenebis(3,4,6-trichlorophenol)
U068	Methylene bromide
U080	Methylene chloride
U122	Methylene oxide
U159	Methyl ethyl ketone (I,T)
U160	Methyl ethyl ketone peroxide (R,T)
U138	Methyl iodide
U161	Methyl isobutyl ketone (I)
U162	Methyl methacrylate (I,T)
U163	N-Methyl-N'-nitro-N-nitrosoguanidine
U161	4-Methyl-2-pentanone (I)
U164	Methylthiouracil
U010	Mitomycin C
U059	5,12-Naphthacenedione, (8S-cis)-8-acetyl-10-[(3-amino-2,3,6-trideoxy-alpha-L-lyxo-hexopyranosyl)oxy]-7,8,9,10-tetrahydro-6,8,11-trihydroxy-1-methoxy-
U165	Naphthalene
U047	Naphthalene, 2-chloro-
U166	1,4-Naphthalenedione
U236	2,7-Naphthalenedisulfonic acid, 3,3'-[(3,3'-dimethyl-(1,1'-biphenyl)-4,4'-diyl)]-bis (azo)bis(5-amino-4-hydroxy)-,tetrasodium salt
U166	1,4,Naphthaquinone
U167	1-Naphthylamine
U168	2-Naphthylamine
U167	alpha-Naphthylamine
U168	beta-Naphthylamine
U026	2-Naphthylamine, N,N'-bis(2-chloroethyl)-
U169	Nitrobenzene (I,T)
U170	p-Nitrophenol
U171	2-Nitropropane (I, T)[3]
U172	N-Nitroso-n-butylamine
U173	N-Nitrosodiethanolamine
U174	N-Nitrosodiethylamine
U111	N-Nitroso-N-propylamine
U176	N-Nitroso-N-ethylurea
U177	N-Nitroso-N-methylurea
U178	N-Nitroso-N-methylurethane
U179	N-Nitrosopiperidine
U180	N-Nitrosopyrrolidine
U181	5-Nitro-o-toluidine
U193	1,2-Oxathiolane, 2,2-dioxide
U058	2H-1,3,2-Oxazaphosphorine, 2-[bis(2-chloro- ethyl)amino]tetrahydro-, oxide 2-
U115	Oxirane (I,T)
U041	Oxirane, 2-(chloromethyl)-
U182	Paraldehyde
U183	Pentachlorobenzene
U184	Pentachloroethane
U185	Pentachloronitrobenzene
See FO27[1]	Pentachlorophenol
U186	1,3-Pentadiene (I)
U187	Phenacetin
U188	Phenol
U048	Phenol, 2-chloro-
U039	Phenol, 4-chloro-3-methyl-
U081	Phenol, 2,4-dichloro-
U082	Phenol, 2,6-dichloro-
U101	Phenol, 2,4-dimethyl-
U170	Phenol, 4-nitro-
U242	Phenol, pentachloro-
U212	Phenol, 2,3,4,6-tetrachloro-
U230	Phenol, 2,4,5-trichloro-
U231	Phenol, 2,4,6-trichloro-
U137	1,10-(1,2-phenylene)pyrene
U145	Phosphoric acid, Lead salt
U087	Phosphorodithioic acid, 0,0-diethyl-, S-methylester
U189	Phosphorous sulfide (R)
U190	Phthalic anhydride
U191	2-Picoline
U192	Pronamide
U194	1-Propanamine (I,T)
U110	1-Propanamine, N-propyl- (I)
U066	Propane, 1,2-dibromo-3-chloro-
U149	Propanedinitrile
U171	Propane, 2-nitro- (I, T)[3]
U027	Propane, 2,2'oxybis[2-chloro-
U193	1,3-Propane sultone
U235	1-Propanol, 2,3-dibromo-, phosphate (3:1)
U126	1-Propanol, 2,3-epoxy-
U140	1-Propanol, 2-methyl- (I,T)
U002	2-Propanone (I)
U007	2-Propenamide
U084	Propene, 1,3-dichloro-
U243	1-Propene, 1,1,2,3,3,3-hexachloro-
U009	2-Propenenitrile
U152	2-Propenenitrile, 2-methyl- (I,T)
U008	2-Propenoic acid (I)
U113	2-Propenoic acid, ethyl ester (I)
U118	2-Propenoic acid, 2-methyl-, ethyl ester
U162	2-Propenoic acid, 2-methyl-, methyl ester (I,T)
See FO27[1]	Propionic acid, 2-(2,4,5-trichlorophenoxy)-
U194	n-Propylamine (I,T)
U083	Propylene dichloride
U196	Pyridine
U155	Pyridine, 2-[(2-(dimethylamino)-2-thenylamino]-
U179	Pyridine, hexahydro-N-nitroso-
U191	Pyridine, 2-methyl-
U164	4(1H)-Pyrimidinone, 2,3-dihydro-6-methyl-2-thioxo-
U180	Pyrrole, tetrahydro-N-nitroso-
U200	Reserpine
U201	Resorcinol
U202	Saccharin and salts
U203	Safrole
U204	Selenious acid
U204	Selenium dioxide
U205	Selenium disulfide (R,T)
U015	L-Serine, diazoacetate (ester)
See FO27[1]	Silvex
U089	4,4'-Stilbenediol, alpha,alpha'-diethyl-
U206	Streptozotocin
U135	Sulfur hydride
U103	Sulfuric acid, dimethyl ester
U189	Sulfur phosphide (R)
U205	Sulfur selenide (R,T)
See FO27[1]	2,4,5-T
U207	1,2,4,5-Tetrachlorobenzene
U208	1,1,1,2-Tetrachloroethane
U209	1,1,2,2-Tetrachloroethane
U210	Tetrachloroethylene
See FO27[1]	2,3,4,6-Tetrachlorophenol
U213	Tetrahydrofuran (I)
U214	Thallium(I) acetate
U215	Thallium(I) carbonate
U216	Thallium(I) chloride
U217	Thallium(I) nitrate
U218	Thioacetamide
U153	Thiomethanol (I,T)
U219	Thiourea
U244	Thiram
U220	Toluene
U221	Toluenediamine
U223	Toluene diisocyanate (R,T)
U328	o-Toluidine[2]
U353	p-Toluidine[2]
U222	O-Toluidine hydrochloride
U011	1H-1,2,4-Triazol-3-amine
U226	1,1,1-Trichloroethane
U227	1,1,2-Trichloroethane
U228	Trichloroethene
U228	Trichloroethylene
U121	Trichloromonofluoromethane
See FO27[1]	2,4,5-Trichlorophenol
See FO27[1]	2,4,6-Trichlorophenol
See FO27[1]	2,4,5-Trichlorophenoxyacetic acid
U234	sym-Trinitrobenzene (R,T)
U182	1,3,5-Trioxane, 2,4,5-trimethyl-
U235	Tris(2,3-dibromopropyl) phosphate
U236	Trypan blue
U237	Uracil, 5[bis(2-chloromethyl)amino]-
U237	Uracil mustard
U043	Vinyl chloride
U248	Warfarin, when present at concentrations of 0.3% or less.

[49 FR 19922, May 10, 1984; effective November 12, 1984]

U239	Xylene (I)
U200	Yohimban-16-carboxylic acid, 11,17-dimethoxy-18-[(3,4,5-trimethoxybenzoyl)oxy]-, methyl ester,
U249	Zinc phosphide, when present at concentrations of 10% or less.

[49 FR 19922, May 10, 1984; effective November 12,1984]

[1] 50 FR 1978, Jan. 14, 1985, effective July 15, 1985.

[2] 50 FR 42936, Oct. 23, 1985, effective April 23, 1986.

[3] 51 FR 6537, Feb. 25, 1986, effective Aug. 25, 1986.

[261.33(f) table]

EXHIBIT 4 - HW-ASD-1.1

DISCARDED COMMERCIAL CHEMICAL PRODUCTS, OFF-SPECIFICATION SPECIES, CONTAINERS, AND SPILL RESIDUES THEREOF

Hazardous waste No.	[261.33(e) Table] Substance
P023	Acetaldehyde, chloro-
P002	Acetamide, N-(aminothioxomethyl)-
P057	Acetamide, 2-fluoro-
P058	Acetic acid, fluoro-, sodium salt
P066	Acetimidic acid, N-[(methylcarbamoyl)oxy]thio-, methyl ester
P001	3-(alpha-Acetonylbenzyl)-4-hydroxycoumarin and salts, when present at concentrations greater than 0.3%
P002	1-Acetyl-2-thiourea
P003	Acrolein
P070	Aldicarb
P004	Aldrin
P005	Allyl alcohol
P006	Aluminum phosphide
P007	5-(Aminomethyl)-3-isoxazolol
P008	4-Aminopyridine
P009	Ammonium picrate (R)
P119	Ammonium vanadate
P010	Arsenic acid
P012	Arsenic (III) oxide
P011	Arsenic (V) oxide
P011	Arsenic pentoxide
P012	Arsenic trioxide
P038	Arsine, diethyl-
P054	Aziridine
P013	Barium cyanide
P024	Benzenamine, 4-chloro-
P077	Benzenamine, 4-nitro-
P028	Benzene, (chloromethyl)-
P042	1,2-Benzenediol, 4-[1-hydroxy-2-(methylamino)ethyl]-
P014	Benzenethiol
P028	Benzyl chloride
P015	Beryllium dust
P016	Bis(chloromethyl) ether
P017	Bromoacetone
P018	Brucine
P021	Calcium cyanide
P123	Camphene, octachloro-
P103	Carbamimidoselenoic acid
P022	Carbon bisulfide
P022	Carbon disulfide
P095	Carbonyl chloride
P033	Chlorine cyanide
P023	Chloroacetaldehyde
P024	p-Chloroaniline
P026	1-(o-Chlorophenyl)thiourea
P027	3-Chloropropionitrile
P029	Copper cyanides
P030	Cyanides (soluble cyanide salts), not elsewhere specified
P031	Cyanogen
P033	Cyanogen chloride
P036	Dichlorophenylarsine
P037	Dieldrin
P038	Diethylarsine
P039	O,O-Diethyl S-[2-(ethylthio)ethyl] phosphorodithioate
P041	Diethyl-p-nitrophenyl phosphate
P040	O,O-Diethyl O-pyrazinyl phosphorothioate
P043	Diisopropyl fluorophosphate
P044	Dimethoate
P045	3,3-Dimethyl 1-(methylthio)-2-butanone O[(methylamino)carbonyl] oxime
P071	O,O-Dimethyl O-p-nitrophenyl phosphorothioate
P082	Dimethylnitrosamine
P046	alpha, alpha-Dimethylphenethylamine
P047	4,6-Dinitro-o-cresol and salts
P034	4,6-Dinitro-o-cyclohexylphenol

Hazardous waste No	Substance
P048	2,4-Dinitrophenol
P020	Dinoseb
P085	Diphosphoramide, octamethyl-
P039	Disulfoton
P049	2,4-Dithiobiuret
P109	Dithiopyrophosphoric acid, tetraethyl ester
P050	Endosulfan
P088	Endothall
P051	Endrin
P042	Epinephrine
P046	Ethanamine, 1,1-dimethyl-2-phenyl-
P084	Ethenamine, N-methyl-N-nitroso-
P101	Ethyl cyanide
P054	Ethyleneimine
P097	Famphur
P056	Fluorine
P057	Fluoroacetamide
P058	Fluoroacetic acid, sodium salt
P065	Fulminic acid, mercury(II) salt (R,T)
P059	Heptachlor
P051	1,2,3,4,10,10-Hexachloro-6,7-epoxy-1,4,4a,5,6,7,8,8a-octahydro-endo,endo-1,4:5,8-dimethanonaphthalene
P037	1,2,3,4,10,10-Hexachloro-6,7-epoxy-1,4,4a,5,6,7,8,8a-octahydro-endo,exo-1,4:5,8-dimethanonaphthalene
P060	1,2,3,4,10,10-Hexachloro-1,4,4a,5,8,8a-hexahydro-1,4:5,8-endo, endo-dimeth- anonaphthalene
P004	1,2,3,4,10,10-Hexachloro-1,4,4a,5,8,8a-hexahydro-1,4:5,8-endo,exo-dimethanonaphthalene
P060	Hexachlorohexahydro-exo,exo-dimethanonaphthalene
P062	Hexaethyl tetraphosphate
P116	Hydrazinecarbothic-mide
P068	Hydrazine, methyl-
P063	Hydrocyanic acid
P063	Hydrogen cyanide
P096	Hydrogen phosphide
P064	Isocyanic acid, methyl ester
P007	3(2H)-Isoxazolone, 5-(aminomethyl)-
P092	Mercury, (acetato-O)phenyl-
P065	Mercury fulminate (R,T)
P016	Methane, oxybis(chloro-
P112	Methane, tetranitro- (R)
P118	Methanethiol, trichloro-
P059	4,7-Methano-1H-indene, 1,4,5,6,7,8,8-heptachloro-3a,4,7,7a-tetrahydro-
P066	Methomyl
P067	2-Methylaziridine
P068	Methyl hydrazine
P064	Methyl isocyanate
P069	2-Methyllactonitrile
P071	Methyl parathion
P072	alpha-Naphthylthiourea
P073	Nickel carbonyl
P074	Nickel cyanide
P074	Nickel(II) cyanide
P073	Nickel tetracarbonyl
P075	Nicotine and salts
P076	Nitric oxide
P077	p-Nitroaniline
P078	Nitrogen dioxide
P076	Nitrogen(II) oxide
P078	Nitrogen(IV) oxide
P081	Nitroglycerine (R)
P082	N-Nitrosodimethylamine
P084	N-Nitrosomethylvinylamine
P050	5-Norbornene-2,3-dimethanol, 1,4,5,6,7,7-hexachloro, cyclic sulfite
P085	Octamethylpyrophosphoramide
P087	Osmium oxide
P087	Osmium tetroxide
P088	7-Oxabicyclo[2.2.1]heptane-2,3-dicarboxylic acid
P089	Parathion
P034	Phenol, 2-cyclohexyl-4,6-dinitro-

Hazardous waste No	Substance
P048	Phenol, 2,4-dinitro-
P047	Phenol, 2,4-dinitro-6-methyl-
P020	Phenol, 2,4-dinitro-6-(1-methylpropyl)-
P009	Phenol, 2,4,6-trinitro-, ammonium salt (R)
P036	Phenyl dichloroarsine
P092	Phenylmercuric acetate
P093	N-Phenylthiourea
P094	Phorate
P095	Phosgene
P096	Phosphine
P041	Phosphoric acid, diethyl p-nitrophenyl ester
P044	Phosphorodithioic acid, O,O-dimethyl S-[2-(methylamino)-2-oxoethyl]ester
P043	Phosphorofluoric acid, bis(1-methylethyl) ester
P094	Phosphorothioic acid O,O-diethyl S-(ethylthio)methyl ester
P089	Phosphorothioic acid, O,O-diethyl O-(p-nitrophenyl) ester
P040	Phosphorothioic acid, O,O-diethyl O- pyrazinyl ester
P097	Phosphorothioic acid, O,O-dimethyl O-[p-((dimethylamino)-sulfonyl)phenyl]ester
P110	Plumbane, tetraethyl-
P098	Potassium cyanide
P099	Potassium silver cyanide
P070	Propanal, 2-methyl-2-(methylthio)-, O-[(methylamino)carbonyl]oxime
P101	Propanenitrile
P027	Propanenitrile, 3-chloro-
P069	Propanenitrile, 2-hydroxy-2-methyl-
P081	1,2,3-Propanetriol, trinitrate- (R)
P017	2-Propanone, 1-bromo-
P102	Propargyl alcohol
P003	2-Propenal
P005	2-Propen-1-ol
P067	1,2-Propylenimine
P102	2-Propyn-1-ol
P008	4-Pyridinamine
P075	Pyridine, (S)-3-(1-methyl-2-pyrrolidinyl)-, and salts
P111	Pyrophosphoric acid, tetraethyl ester
P103	Selenourea
P104	Silver cyanide
P105	Sodium azide
P106	Sodium cyanide
P107	Strontium sulfide
P108	Strychnidin-10-one, and salts
P018	Strychnidin-10-one, 2,3-dimethoxy-
P108	Strychnine and salts
P115	Sulfuric acid, thallium(I) salt
P109	Tetraethyldithiopyrophosphate
P110	Tetraethyl lead
P111	Tetraethylpyrophosphate
P112	Tetranitromethane (R)
P062	Tetraphosphonic acid, hexaethyl ester
P113	Thallic oxide
P113	Thallium(III) oxide
P114	Thallium(I) selenite
P115	Thallium(I) sulfate
P045	Thiofanox
P049	Thioimidodicarbonic diamide
P014	Thiophenol
P116	Thiosemicarbazide
P026	Thiourea, (2-chlorophenyl)-
P072	Thiourea, 1-naphthalenyl-
P093	Thiourea, phenyl-
P123	Toxaphene
P118	Trichloromethanethiol
P119	Vanadic acid, ammonium salt
P120	Vanadium pentoxide
P120	Vanadium(V) oxide
P001	Warfarin, when present at concentrations greater than 0.3%
P121	Zinc cyanide
P122	Zinc phosphide, when present at concentrations greater than 10%

EXHIBIT 5 - HW-ASD-1.1

HAZARDOUS INFORMATION REQUEST

SAMPLE

Gentlemen:

The following material manufactured by your company is used in our operations:

It is necessary for us to determine the hazardous characteristics of this material in order to comply with Federal and State Hazardous Waste Regulations. Please provide us a Material Safety Data Sheet on this material. Any other pertinent information that would assist us in properly identifying the hazardous waste characteristics, if any, of this material would be appreciated.

Sincerely,

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EXHIBIT 6 - HW-ASD-1.1

_____ SERVICE SHOP
HAZARDOUS WASTE ANALYSIS PLAN

The _____ Service Shop is responsible for identifying those materials which upon disposal are defined as hazardous wastes under RCRA and/or by the hazardous waste management regulations of the state of _____ . These materials include all stock materials that could result in hazardous waste when discarded and wastes produced by shop processes.

A. Stock Materials

1. All stock materials used in the _____ Service Shop will be reviewed annually to determine if they exhibit hazardous characteristics or are included in the hazardous waste substance listings. Identification of materials will be accomplished through the use of data established by the Apparatus Service Department on commonly used Service Shop materials, material safety data sheets and vendor information.

2. New materials added to stock will be reviewed by _____, _____ to determine if they will require control or disposal as hazardous wastes when discarded.

3. The identification of stock materials as potential hazardous wastes will be in accordance with the procedures defined in the "Hazardous Waste Analysis" section of the ASD Hazardous Waste Management Manual.

4. A current listing of materials maintained in stock which require control or disposal as hazardous wastes will be maintained in the _____ Service Shop's Hazardous Waste Analysis File.

B. Shop Process Wastes

1. Materials produced by shop processes will require periodic chemical and physical analysis to determine if they exhibit hazardous characteristics.

   If the analysis shows no hazardous characteristics, then the analysis will be repeated annually or whenever a significant process change occurs (e.g. change of cleaning agent). If hazardous characteristics are identified, then analysis is required each time the material is removed for disposal.

EXHIBIT 6 - HW-ASD-1.1
(Continued)

2. Materials which require analysis are as follows:

Material	Location	Type of Analysis
Oil Water Separator Sludge		Ignitability D001 Corrosivity D002 EP Toxicity D004-D011 Total Halogens
Cleaning Operation Sumps (Including Steam Cleaning)		Corrosivity D002 EP Toxicity D004-D011
Water Wash Spray Booth Sludges		EP Toxicity D004-D011
Abrasive Blasting Dust		EP Toxicity D004-D011
Magnus Cleaning Tank Sludge		EP Toxicity D004-D011

3. Copies of the most current analysis reports will be maintained in the _____ Service Shop's Hazardous Waste Analysis File.

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I. CONTAINER STORAGE

A. Hazardous Wastes must be stored in labeled containers that are compatible with the wastes and are in good condition.

B. Hazardous Waste containers must remain closed except during addition or removal of waste.

C. Containers must be inspected weekly.

D. Containers holding ignitable or reactive waste must be stored in a specially designated area located at least 50 feet inside the shop's property line. These areas must be designated as "no smoking" areas.

E. Incompatible waste materials must be separated by a dike, wall, etc. (e.g., keep oxidizers separate from ignitable materials).

II. TANK STORAGE

A. Tank storage of hazardous waste is not permitted without the prior approval of the ASD Manager, Health and Environmental Protection.

B. When tanks are approved for hazardous waste storage, the following standards apply:

1. All tanks and ancillary equipment, both above and below ground, must be provided with full secondary containment.

2. The secondary containment system must be provided with a leak detection system capable of detecting leaks within 24 hours.

3. Tanks into which Hazardous Waste materials are fed continuously must be equipped with a feed cutoff system or some means of diverting the feed to a standby tank.

4. "Ignitable" or "reactive" wastes may be stored in tanks only if:

- Treatment or storage conditions render the wastes unignitable or unreactive, or

- The wastes are added under emergency conditions.

5. Tanks containing Hazardous Wastes must be inspected daily for evidence of corrosion or leaks, and proper operation of controls and leak detection equipment. Tanks must be inspected weekly for physical condition of the tanks and associated structures. The area immediately surrounding the tank must be inspected weekly to detect signs of leakage (e.g. wet spots or dead vegetation).

6. Installation of new tanks or repair of leaking tanks requires an inspection and certification by a Registered Professional Engineer that the tanks are properly installed, properly backfilled, leak tested and protected from corrosion.

7. Tanks used for the storage of hazardous waste over 90 days will require a design review by the EPA Regional Administrator including foundation, structural supports, seams and pressure control.

III. STORAGE TIME LIMITS FOR GENERATORS

A. A generator is a conditionally exempt small quantity generator if he generates no more than 100 kilograms (kg) of hazardous waste (or 1 Kg of acutely hazardous waste) in a calendar month. A conditionally exempt small quantity generator is generally not subject to regulation under 40 CFR Parts 262 through 266. No service shops are likely to be excluded under this exemption.

B. A generator who generates greater than 100 kilograms (Kg) but less than 1000 Kg of hazardous waste in a calendar month, may accumulate hazardous waste on site for 180 days without a permit, provided that:

1. The quantity of waste accumulated on site never exceeds 6000 Kg.

2. The generator complies with Subpart I of 40CFR265, Use and Containers.

   - Containers are in good condition compatible with waste.
   - Containers are labeled and dated.
   - Weekly inspections are performed.

3. The generator complies with Subpart C of 40CFR265, Preparation and Prevention. (See HW-ASD-2.1 Section VI)

4. The generator must develop a specified emergency plan (see HW-ASD-8.1).

C. If a generator who generates greater than 100 but less than 1000 Kg of hazardous waste in a calendar month must transport the waste over a distance of 200 miles or more for off-site disposal, he may accumulate hazardous waste for 270 days or less without a permit, providing all the requirements of III.B are complied with.

D. A generator who generates 1000 Kg or more of hazardous waste in a calendar month may accumulate waste on-site for 90 days or less without a permit provided all the requirements of III.B are complied with.

E. A generator may accumulate as much as 55 gallons of hazardous waste (or one quart of acutely hazardous waste) at a point of generation provided that:

1. The container is in good condition,

2. The container is compatible with the waste.

3. The container is closed during storage, except when adding or removing hazardous waste.

4. The container is marked with the words "Hazardous Waste".

When the container is filled it must be dated with the date filled and moved to the storage area within three days. The time required to fill the drum, at the point of accumulation, is exempt from the storage time limits.

IV. SECURITY

A. Where the storage of Hazardous Wastes will exceed 180 days, the storage area must be surrounded by a barrier (e.g., fence containing a locked door or gate). A sign with the legend "Danger--Unauthorized Personnel Keep Out" must be posted at each entrance to the storage area.

B. Where the storage of Hazardous Wastes will be less than 180 days, storage must be in a designated area that will minimize the possibility of unauthorized entry. This area will be posted "Danger -- Unauthorized Personnel Keep Out."

* V. CONTAINMENT

Where the storage of Hazardous Waste containers will exceed 180 days, a containment system is required as follows:

A. A base must underly the containers which is free of cracks or gaps and is sufficiently impervious to contain leaks, spills, and accumulated precipitation.

B. The base must be designed to drain and remove liquids resulting from leaks, spills, or precipitation.

C. The containment system must have sufficient capacity to contain 10% of the volume of containers, or the volume of the largest container, whichever is greater.

D. Run-on into the containment system must be prevented.

E. Spilled or leaked waste and accumulated precipitation must be removed from sump or collection area to prevent overflow.

VI. PREPAREDNESS AND PREVENTION

Service shops must be operated and maintained to minimize the possibility of fire, explosion, or unplanned release of Hazardous Waste into the environment.

A. Each shop must be equipped with the following:

1. An internal communications or alarm system. Internal shop telephone extensions, public address systems and intercomm systems are all acceptable.

2. External communication system (e.g., telephone capable of summoning emergency assistance from local fire departments, police departments, etc.).

3. Fire control equipment (e.g., portable fire extinguishers, fire hoses, sprinkler system, etc.).

4. Spill control equipment (e.g., absorbent material, shovels, brooms, plastic sheeting, spare drums).

5. Personal protective equipment (e.g., rubber boots, rubber gloves, disposable coveralls, face shields, and respirators).

* Part B application storage standards.

B. Whenever Hazardous Waste is being poured, mixed, spread, or otherwise handled, immediate access to an alarm or telephone must be available, either directly or through visual or voice contact with another employee.

C. Sufficient aisle space must be maintained in the shop and yard to allow unobstructed movement of personnel, fire protection equipment, and spill control equipment.

D. Arrangements must be made with local agencies (e.g., fire and police departments) for services that would be needed in case of fire, explosions, or hazardous material releases. These agencies should be made familiar with the shop layout, properties of Hazardous Wastes handled, entrances to the shop, and evacuation routes. Where local authorities decline to enter into such arrangements, the service shop must document the refusal in the operating record.

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I. MATERIALS IDENTIFICATION

Materials that will become Hazardous Wastes must be identified so that they will be properly accumulated, stored, and shipped when they are discarded. It is recommended that stock materials be color coded according to the appropriate Hazardous Waste categories listed below.

Color Code	EPA Hazardous Waste Number	Hazard Characteristic
Red	D001	Ignitable
Brown	U---*	Toxic
Green	D002	Corrosive
Yellow	D001	Oxidizers (Ignitable)
Orange	P---	Acute Hazardous Wastes (Poisons)

At shops with very little hazardous waste, color coding may not be necessary. However, waste must still be properly identified and segregated.

* U numbers require the specific material designation.

II. HAZARDOUS WASTE COLLECTION

A. Service Shops should establish specifically designated locations as collection areas in which frequently disposed of Hazardous Waste materials can be accumulated. Collection containers, with covers, should be placed in these areas. Collection containers must be properly labeled, stating the type of Hazardous Waste they contain and the proper category of Hazardous Waste material. Collection containers used for ignitable wastes must be Factory Mutual approved. The following are typical examples of materials whose frequency of disposal might warrant a collection container.

Material	EPA Hazardous Waste Number	Hazard Characteristic
Paint Cans With Over One Inch Residual Material	D001	Ignitable
Flammable solvent and thinner rags	D001	Ignitable
Residual nonflammable solvents	U---	Toxic
Aerosol cans	Various	Various

B. The number of collection areas and containers should be restricted to a minimum. Hazardous Waste materials that are infrequently discarded should be sent directly to the designated Hazardous Waste storage area as they are generated.

C. Hazardous Waste in accumulation area collection containers must be removed to a qualified storage area on a regularly scheduled basis. Ignitable wastes should be picked up daily and other wastes should be picked up weekly.

D. Close control of solvents and thinners used for cleaning or paint and varnish thinning is required in order to provide adequate segregation and prevent improper disposal of these materials. Solvents and thinners used on the shop floor should be placed in containers marked with the contents (flammable liquids must be in FM approved safety cans). Only the solvent or thinner that is marked on the container should be placed in the container. All discarded, unused, or contaminated solvents and thinners should be placed in designated drums marked for that specific material. If different types of solvents and thinners have been mixed together, a chemical analysis of the material may be required before it can be disposed of.

E. Hazardous wastes should be minimized as much as possible. Infrequently used materials or similar materials (e.g., paints, solvents, varnishes, etc.) should be evaluated to determine if their use can be eliminated. Maximum use should be made of materials that can be recycled (e.g., rented, washable wipers; deposit or returnable drums). There will be a substantial cost increase in materials that become Hazardous Wastes because they will require special handling for disposal.

III. HAZARDOUS WASTE SORTING, SEGREGATION, AND STORAGE

A. Container Disposal

If the following requirements are met, the containers listed below can be disposed of as general trash.

1. Hazardous Material Containers

   Containers that have held hazardous materials (except for acute Hazardous Wastes identified by P numbers) must be inspected to insure that there is less than one inch of material remaining in the bottom of the container. If the residual hazardous material exceeds one inch, then the container must be classified as Hazardous Waste.

2. Aerosol Containers

   Aerosol containers that contain hazardous materials must be inspected to insure there is no pressure remaining in the container. If there is residual pressure, then the aerosol container must be classified as Hazardous Waste.

3. Solvent and Thinner Drums

   Solvent and thinner drums must be inspected to insure that they have been thoroughly drained.

4. Steam Cleaning Material Drums

   Drums that contained either liquid or powder alkaline or caustic cleaning materials must be thoroughly rinsed with water to insure that no material remains in the drum. If the drum contains a liner, then the liner should be thoroughly rinsed.

B. Storage Containers

With the exception of acids, DOT Specification 17E (bung opening) and 17H (removable head) drums should be used to store Hazardous Wastes. Acids should be stored in their original containers. A plastic liner should be placed inside drums that will contain corrosive materials. Below is a list of typical Hazardous Wastes generated in service shops that will require storage drums.

Waste Material	EPA Hazardous Waste No.	Hazard Characteristic or Listing
Paint and Varnish Residues	D001	Ignitable
Used Solvent Soaked Rags	D001	Ignitable
Flammable Solvents and Thinners	D001 or U---	Ignitable Specific Listing
Spent Nonflammable Solvents	F001	Toxic
Residual Nonflammable Solvents	U---	Specific Listing
Scrap Varnishes	D001	Ignitable
Sludge--Oil Water Separators and Cleaning Pits	D002 and/or D008	Corrosive; Toxic (High Lead Concentration)
Sludge--Water Wash Metallizing Booths	D007	Toxic (High Chromium Concentration)
Sludge--Water Wash Paint Booths	D007 or D008	Toxic (High Chromium or Lead Concentration)
Steam Cleaning Materials Soldering Fluxes Etching Solutions	D002	Corrosive
Epoxy Catalysts	D001	Ignitable (Oxidizers)

C. Storage Container Labeling

A Hazardous Waste Label (see Exhibit 1) must be placed on the storage container as soon as the first Hazardous Waste material is placed in the storage container. The Hazardous Waste label must contain the following information:

GENERATOR INFORMATION

NAME _____

ADDRESS _____

CITY _____ STATE _____ ZIP _____

EPA ID. NO. _____

EPA WASTE NO. _____

ACCUMULATION START DATE _____

IV. SERVICE SHOP HAZARDOUS WASTE CONTROL PLAN

Exhibit 2 illustrates a typical Service Shop Hazardous Waste Control Plan. This plan must include the following information:

A. Identification of Stock Hazardous Materials

B. Layout of Collection Receptacles

C. Operating Procedures.

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EXHIBIT 1 - HW-ASD-3.1

HAZARDOUS WASTE LABEL

HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL

IF FOUND, CONTACT THE NEAREST POLICE, OR
PUBLIC SAFETY AUTHORITY, OR THE
U.S. ENVIRONMENTAL PROTECTION AGENCY

PROPER D.O.T.
SHIPPING NAME _____ UN OR NA# _____

GENERATOR INFORMATION:

NAME _____

ADDRESS _____

CITY _____ STATE _____ ZIP _____

EPA
ID NO. _____

EPA
WASTE NO. _____

ACCUMULATION
START DATE _____

MANIFEST
DOCUMENT NO. _____

HANDLE WITH CARE!

CONTAINS HAZARDOUS OR TOXIC WASTES

STYLE WM-6

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EXHIBIT 2 - HW-ASD-3.1

NEW YORK SERVICE SHOP
HAZARDOUS WASTE CONTROL PLAN

The United States Environmental Protection Agency has issued regulations that define and control Hazardous Wastes. These regulations are contained in the Resource Conservation and Recovery Act (RCRA) which went into effect on November 19, 1980. The State of New Jersey has also issued regulations for the control of Hazardous Waste.

These regulations list specific materials that are defined as Hazardous Wastes when they are discarded. The regulations also specify characteristics that result in a material being classified as hazardous. These characteristics are:

- Ignitability
- Corrosivity
- Reactivity
- Toxicity

Now, there are specific legal requirements for the storage, transportation, treatment, and disposal of any waste material that is listed or has the characteristics defined in the regulations.

This means that many of the materials used in the shop can no longer be treated as general trash or dumped in the drains. All discarded hazardous materials including leftover materials in containers must be separated, accumulated, and properly stored. Records of the various types and amounts of Hazardous Wastes generated must be maintained, and the wastes must be shipped to disposal or treatment sites that have obtained permits from the Environmental Protection Agency.

In order to control and determine the Hazardous Wastes being generated in the shop, the following procedures have been established.

HAZARDOUS WASTE PROCEDURES

Collection of Hazardous Materials

Collection receptacles are provided throughout the shop for hazardous materials that are frequently discarded. These receptacles are located at specifically designated areas and should not be removed from these areas except by specially assigned and trained personnel. Five (5) separate receptacles are provided for the following groupings of hazardous materials.

- Paint and Varnish Waste
  Cans
  Spray cans
  Used brushes
  Used paint booth filters
  Used mixing tools
  Paint and varnish soaked rags

- Used Rags
  Solvent rags
  Thinner rags
  Oil and grease rags

- Nondestructive Testing Materials
  Magnaflux SKC-NF cleaner/remover
  Magnaflux SKD-NF developer
  Zyglo AC7 cleaner/remover
  Zyglo ZP9 developer

- Waste Oils

Each collection receptacle will be marked as shown above for the disposal of those specific items. No other materials should be placed in these receptacles.

Other stockroom items that are hazardous materials will be color coded according to their hazardous characteristics. The coding will consist of 3/4 inch diameter colored dots. The colors and their corresponding hazardous characteristics are as follows:

- Red--Ignitable
- Green--Corrosive
- Yellow--Reactive
- Brown--Toxic

Collection receptacles using the same color code are provided at the stockroom for these materials. When these marked items are disposed of, they must be returned to the stockroom and placed in the proper collection receptacle. Do not dispose of these materials in the floor collection receptacles or in the general trash.

A container which held a hazardous material must be inspected to insure that there is less than one inch of material remaining in the container before it can be disposed of as general trash.

All aerosol cans must be inspected to insure that they do not contain pressure before they can be discarded as general trash. These cans will be inspected and placed in the general trash by the maintenance operation.

Solvents and Thinner Drums

All solvent and thinner drums inside the shop will be stored in the stockroom. All solvents and thinners used on the shop floor must be in safety cans with the contents marked on the safety can. Safety cans will be assigned to specific shop work areas and all solvents and thinners

obtained from drums must be dispensed by the stockroom. When the safety can is empty, it must be returned to the stockroom for refilling. The safety can must only be used for the solvent or thinner marked on the can. Leftover or contaminated solvents and thinners must be returned to the stockroom for proper disposal. Do not dispose of solvents and thinners by pouring them into drains or by placing them in the general trash.

The following solvents and thinners supplied in drums are presently used by the shop:

Material	Flash Point	EPA Hazard No.
Toluene	40° F	U220 (Toxic, Ignitable)
Xylene	77° F	U239 (Toxic, Ignitable)
Tri ethane	None	U226 (Toxic)
MIK (Methyl Isobutyl Ketone)	73° F	U161 (Toxic, Ignitable)
1500 Thinner	30° F	U239 (Toxic, Ignitable)
1514 Thinner	28° F	D001 (Ignitable)
Mineral Spirits	100° F	D001 (Ignitable)
Alcohol (Fotocol)	61° F	D001 (Ignitable)
Kerosene	115° F	D001 (Ignitable)
Cellosolve	106° F	D001 (Ignitable)

Other Hazardous Materials

Other hazardous materials generated by the shop include the following:

- Insulating varnishes that have "set up" or are contaminated, and varnish residues resulting from the cleanup of drip pans, baking ovens, and dip tanks.
- Spent solvents and sludges removed from cleaning tanks and vapor degreasers.
- Leftover cleaning materials used in steam cleaning operations.
- Sludge from steam cleaning pits and oil/water separators.
- Sludge from water wash spray booths and used filters from spray booths.

These materials listed above are defined as Hazardous Wastes and will require special handling for disposal. Whenever it is necessary to dispose of the above materials, notify your foreman so that maintenance can provide the proper containers.

Drum Control

All drums containing the following material will be received and issued through the stockroom only:

- Insulating Varnishes
- Oils (except transformer oils)
- Steam Cleaning Materials
- NDT Materials

All empty drums that contained these materials must be returned to the stockroom.

Accumulation and Disposal of Hazardous Wastes

Collection Frequency.

All flammable materials (paint cans, rags) discarded in the shop floor receptacles must be collected daily. All other materials discarded in the shop floor receptacles or stockroom receptacles must be collected weekly and placed in Hazardous Waste storage.

Container Disposal.

If the following requirements are met, these containers can be disposed of as general trash.

- Paint Cans--All discarded paint cans must be inspected to insure that there is less than 1 inch of paint remaining in the bottom of the can. Excess amounts of paint must be removed and placed in a properly labeled Hazardous Waste drum (paint residues).

- Color-Coded Containers--All discarded containers, which are color coded to identify hazardous materials, must be inspected to insure that there is less than 1 inch of material remaining in the bottom of the container. Excess amounts of hazardous materials must be removed and placed in a properly labeled Hazardous Waste drum.

- Aerosol Containers--All discarded aerosol containers must be inspected to insure that there is no pressure remaining in the container.

- Solvent and Thinner Drums--Solvent and thinner drums must be thoroughly drained, and the drained material placed in stock or in a properly labeled Hazardous Waste drum.

- Steam Cleaning Material Drums--Drums that contained either liquid or powder cleaners used in steam cleaning must be thoroughly rinsed with water to insure no material remains in the drum. If the drum contains a liner, then the liner must be removed and thoroughly rinsed.

If the containers do not meet the above requirements, they must be discarded as Hazardous Wastes.

On-Site Jobs

The following materials used on jobs at the customer's site must be returned to the shop for proper disposal:

- Paint and varnish waste
- Used rags
- Aerosol cans
- Color-coded containers
- All drums
- Spent solvents

All solvents and thinners must be checked out of the stockroom and taken to the job site in safety containers.

Proper waste receptacles must be taken to the site if the job is expected to result in generation of Hazardous Waste.

When materials are returned to the Shop, they must be disposed of in accordance with the Hazardous Waste management procedures.

Under no circumstances, unless agreed to by the customer, will GE personnel deposit Hazardous Waste generated on the job into the customer's waste receptacles.

EXHIBIT 2 - HW-ASD-3.1
(Continued)

NEW YORK SERVICE SHOP
STOCK HAZARDOUS MATERIALS

Aisle	Material	Manufacturer	EPA No.	Hazard Character.	Color
Bulk	Soilax Bowl Clnr.	Economics Lab	D002	Corrosive	Green
Bulk	Plastic Pak Backing Material	Allis Chalmers	D002	Corrosive	Green
Bulk	Nordbak High Impact Backing	Rexnord Specialty Chemicals Brookfield, WI 53005	D002	Corrosive	Green
Bulk	Nordbak Backing Material	Rexnord	D002	Corrosive	Green
Bulk	Nordbak Locking Compound	Rexnord	D002	Corrosive	Green
Counter	Form-A-Gasket Part # 3D	Permatex Kansas City, KS 66115	D001	Ignitable	Red
Counter	Form-A-Gasket No. 2	Permatex	D001	Ignitable	Red
Counter	Dykem Steel Blue	Dykem Co. 8501 Delport Drive St. Louis, MO 63314	D001	Ignitable	Red
F-4	Ankorite Penetrating Oil # 5498	Anchor Packing Co. Philadelphia, PA 19130			
F-4	Permafil 3285 Liquid Only	GE IMD	D002	Corrosive	Green
G-4	77 Spray Adhesive	3 M 3 M Center St. Paul, MN 55101	D001	Ignitable	Red
G-4	Devcon Plastic Steel A Hardner Release Agent	Devcon Co. Danvers, MA 01923	D002 D001	Corrosive Ignitable	Green Red
G-4	Handy Flux Type B-1	Handy & Harmon 850 Third Avenue New York, NY 10022		Toxic	Brown

EXHIBIT 2 - HW-ASD-3.1
(Continued)

NEW YORK SERVICE SHOP
STOCK HAZARDOUS MATERIALS

Aisle	Material	Manufacturer	EPA No.	Hazard Character.	Color
G-4	Scotch Grip Industrial Adhesive 826	3 M	D001	Ignitable	Red
G-4	Scotch Grip Rubber Adhesive 1300 L	3 M	D001	Ignitable	Red
G-4	Astro Balance Part B	Astro Chemical Co. 1205 Godfrey Ave. Schenectady, NY	D002	Corrosive	Green
L-5	Metco Seal AP	Metco	D001	Ignitable	Red
F-3	C-100 Hi Temp Molybdenum Disulfide Anti Seize Lubricant Part # 51016	Fel Pro Inc. Skokie, IL 60076		Toxic	Brown
AA	Mobil Turex Wheel Mounting Compound	Mobil	D008	Toxic	Brown
BB	704 Varnish	GE IMD	D001	Ignitable	Red
BB	Paint Stripper	Beck Chemicals 3350 West 137th St. Cleveland, OH 44111	D002	Corrosive	Green
BB	Magnus 66068	Economics Lab	D001	Ignitable	Red
BB	Rustban Thinner TH 6860	Matcote Company Houston, TX 77018		Toxic	Brown
BB	776 Inhibitor	GE IMD	D001	Ignitable	Red
BB	Deoxidine (Phosphoric acid)	Amchem Products, Inc. Ambler, PA	D002	Corrosive	Brown
BB	R7K 211 Standard Reducer	Sherwin Williams Cleveland, OH 44104	U220 U239	Toxic	Brown
BB	701 A Varnish	GE IMD	D001	Ignitable	Red

EXHIBIT 2 - HW-ASD-3.1
(Continued)

NEW YORK SERVICE SHOP
STOCK HAZARDOUS MATERIALS

Aisle	Material	Manufacturer	EPA No.	Hazard Character.	Color
BB	Plastite Thinner #71	Wisconsin Protective Coating	D001	Ignitable	Red
CC	702 B Catalyst	GE IMD	D003	Oxidizer	Yellow
CC	#880 Adhesive	GE IMD	D001	Ignitable	Red
CC	#1276 Lacquer Cement	GE IMD		Toxic	Brown
CC	74010 Hardner	GE IMD	D001	Ignitable	Red
CC	462 Cementing Varnish	GE IMD	D001	Ignitable	Red
Refrigerator	3332 Catalyst	GE IMD	D003	Oxidizer	Yellow
Refrigerator	701 B Catalyst	GE IMD	D003	Oxidizer	Yellow
Refrigerator	73523 B Catalyst	GE IMD	D003	Oxidizer	Yellow
G-6	Garlock 201 Adhesive	Garlock Plastics Div. 602 N. 10th Street Camden, NJ 08101	U069	Toxic	Brown
BB	Brazing Flux #33	Alcoa Pittsburgh, PA 15219	D002	Corrosive	Green
CC	Liquid Wrench	Radiator Specialty Co. Charlotte, NC 28201	D001	Ignitable	Red
Counter	Dalic Plating Solution Silver 308Z	Sifco Metachemical 5708 Schaaf Road Independence, OH 44131	P030	Toxic (Cyanide)	Brown
Counter	Dalic Etching Solution #2	Sifco	D002	Corrosive	Green

EXHIBIT 2 - HW-ASD-3.1
(Continued)

NEW YORK SERVICE SHOP
STOCK HAZARDOUS MATERIALS

Aisle	Material	Manufacturer	EPA No.	Hazard Character.	Color
Counter	Dalic Etching Solution #3	Sifco	D002	Corrosive	Green
	SKC - NF Cleaner-Remover	Magnaflux 7300 W. Lawrence Ave. Chicago, IL 60656	U226	Toxic	
	SKD - NF Developer	Magnaflux	U226	Toxic	
	ZC-7 Zyglo Cleaner-Remover	Magnaflux	U226	Toxic	
	ZP-9 Zyglo Developer		U226	Toxic	

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Title | Number

HAZARDOUS WASTE MINIMIZATION PLAN | HW-ASD-4.1

I. GENERAL

Each service shop must have a waste minimization plan to reduce the volume and toxicity of hazardous waste. The waste minimization plan should contain the following items:

A. A description of the methods used to control hazardous materials that may become hazardous wastes.

B. A description of the methods used to reduced the volume and toxicity of hazardous wastes.

C. A description of the methods used to insure that hazardous waste treatment, storage and disposal practices minimize the present and future threat to human health and the environment.

D. An annual review of Hazardous Waste Minimization Plan which must be completed for each facility. A current copy of this plan must be maintained on file at all times.

II. SERVICE SHOP PLAN

Exhibit 1 is a sample Hazardous Waste Minimization Plan which must be completed for each facility. A current copy of this plan must be maintained on file at all times.

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EXHIBIT 1 - HW-ASD-4.1

_____ SERVICE SHOP

RCRA HAZARDOUS WASTE MINIMIZATION PLAN

I. PURPOSE OF PLAN

Each Service Shop is responsible for reducing to the greatest extent practicable, the volume and toxicity of hazardous waste generated from shop operations. This plan is directed at minimizing hazardous waste generation through material control, volume reduction, process changes or material substitutions to less hazardous materials and recycling or reuse of discarded materials.

II. MATERIAL CONTROL

1. Periodic Review of Stock Material - Stock materials, that could result in the generation of hazardous waste, will be reviewed annually to insure that types and quantities of these materials have adequate usage to justify the stock level. Any material that has inadequate usage will either be removed from future stock or the inventory quantity will be reduced.

2. Minimize Exceeding Shelf Life - To insure that materials do not deteriorate or exceed shelf life, older materials will be used first. All material storage will be in accordance with manufacturer recommendations. Factors such as moisture, heat and freezing will be considered to preclude damage during storage.

3. Control of Purchased Material - Purchase Orders for material that could result in the generation of hazardous waste will be reviewed by a qualified technical individual prior to being approved for purchase. This review is conducted to insure that the least hazardous material and minimum quantity is ordered for a particular operation.

III. VOLUME AND TOXICITY REDUCTION

1. Ruse of Excess Materials - All material withdrawn from stock and not used, will be returned to the stock room for future use. Partially used containers will be sealed and stored to maximize utilization on other jobs.

2. Sludge Dewatering/Evaporation - When ever water and sludge are removed from metallizing booths and paint booths, the water volume will be reduced to the maximum extent practicable. This will be accomplished by minimizing the amount of water added to the booth and maximizing the time for water evaporation prior to removing the sludge and water.

3. Reuse of Solvents - All solvents and degreasers used in shop operations will be re-used to the maximum extent possible. Solvents used in the cleaning tanks and vapor degreasers will not be replaced until absolutely necessary. The useful life these solvents will be extended as long as practicable.

4. Use Non-Hazardous Materials - Where ever practicable, non-hazardous cleaners and degreasers will be used in place of hazardous solvents. Where hazardous solvents must be used, the least hazardous material will be selected.

5. Disposal of Containers - Containers that held a hazardous material will be drained and the waste consolidated to the maximum extent practicable, so that the empty containers can be disposed of as non-hazardous scrap. For example:

   - Containers that held hazardous materials (paints, solvents, etc.) will be inspected and any residual material will be removed and placed in a properly labeled Hazardous Waste Drum.

   - Aerosol Containers will be punctured to remove pressure and drain hazardous materials from the can.

   Containers that meet the following EPA requirements for an empty container will then be disposed of as non-hazardous scrap.

   - All waste has been removed that can be removed by using common practices such as pouring, pumping or aspirating.

   - No more than one inch of residue remains on the bottom of the container.

   - No more than 3% (by weight) of the waste remains n a container less than 110 gallons in size.

   - The pressure in aerosol cans approaches atmospheric pressure.

   - Containers of acutely hazardous waste (identified by P numbers) have been triple rinsed.

IV. WASTE MANAGEMENT ALTERNATIVES

Generators of hazardous waste are required to select hazardous waste treatment, storage and disposal methods which minimize the present and future threat to human health and the environment. To evaluate and select treatment/disposal options, each Service Ship will conduct an annual review with their hazardous waste disposal subcontractors, the appropriateness of their treatment/disposal methods. This review will normally be conducted when waste disposal contracts are negotiated and when new waste types are identified.

Hazardous waste management alternatives will be selected based on the following heirarchy:

1. Waste reduction at its source
2. Recycle/Reuse
3. Incineration
4. Treatment/Detoxification
5. Land Disposal

V. GENERATOR REPORT

In EPA bienial generator reports of State annual generator reports, each Service Shop is required to detail their efforts to reduce the volume and toxicity of wastes and identify actual changes in the volume or toxicity.

To provide documentation for these reports, each Service Shop will perform an Annual Review of hazardous waste minimization activities. This review will include a comparison of current annual waste generation with generation in previous years. This information is available through shipment records and storage inventories. Additionally, an annual summary of waste minimization activities and future plans must be included.

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I. INSPECTION PLAN DOCUMENTATION

Each service shop that generates Hazardous Waste must develop and follow a documented procedure for inspecting all facilities used to store and handle Hazardous Waste.

II. INSPECTION REQUIREMENTS

A. Each EPA Permitted Service Shop must prepare a weekly inspection report. (See Hazardous Waste Management Inspection, Form 1 at the end of this section.) This report must include the following information:

1. Date and time of the inspection
2. Name of the inspector
3. Notation of observations made
4. Date and type of any repairs and remedial action.

B. The following items must be inspected:

1. Container Storage. Inspect storage areas at least once a week to insure that incompatible wastes are separated; that containers are in good condition; that leaking containers are replaced and any spills are cleaned up; that containers are properly marked; that records are being maintained on container storage; and that there is sufficient aisle space to permit inspection of containers. .
2. Tank Storage. Inspect storage tanks daily for evidence of corrosion or leaking seams and proper operation of tank controls and leak detection equipment. Underground tanks should be pressure checked once a year.
3. Personal Safety Equipment. Inspect personal safety equipment at least once a week to insure that it is available and in satisfactory working order. Examples of personal safety equipment are rubber gloves, rubber boots, disposable protective coveralls, face shields, self-contained breathing devices, air supplies, safety showers, internal and external communication systems, etc.

4. Emergency Response Equipment. Inspect emergency response equipment at least once a week to insure that it is in satisfactory working order. Examples of emergency response equipment are water pumping stations, fire hoses, automatic sprinklers, foam systems, portable fire extinguishers, spray systems, etc.

5. Spill Control Equipment. Inspect spill control equipment at least once a week to insure that the equipment is available and in satisfactory working order. Examples of spill control equipment are emergency vehicles, oil booms, absorbent materials, suction equipment, rags, drums, construction equipment, portable pumps, plastic sheets, etc.

The following items will apply only to selected service shops:

6. Process Safety Equipment. Inspect process safety equipment daily to insure that equipment is in satisfactory working order. Examples of process safety equipment are pressure relief valves, emergency vents, toxic gas alarms, emergency evacuation alarms, emergency air removal fans, emergency pumps, emergency containment tanks and impoundment basins, etc.

7. Process Equipment. Inspect process equipment daily to insure that the equipment is in satisfactory working order. Examples of process equipment are pumps, flanges, valves, pipe liners, motors, air compressors, multi-media filters, heat exchangers, centrifuges, etc.

8. Process Controls. Inspect process controls daily to insure that the equipment is calibrated and functioning properly. Examples of process controls are manual and automatic valves, electronic controllers, pneumatic controllers, etc.

9. Process Monitoring Equipment. Inspect process monitoring equipment daily to insure that equipment is indicating and recording properly. Examples of process monitoring equipment are liquid level recorders, process weight recorders, flow recorders, pressure recorders, temperature recorders, pH recorders, oxidation/reduction recorders, lower and upper explosive limit recorders, Cl_2, CO_2, and O_2 recorders, etc.

C. The completed inspection forms must be maintained on file in the Hazardous Waste Operating Record for a minimum of three years.

D. Any faulty Hazardous Waste equipment or structures identified during inspection must be corrected.

FORM 1 - HW-ASD-5.1

WEEKLY HAZARDOUS WASTE INSPECTON FORM

_____ SERVICE SHOP

EPA ID NO. _____

INSPECTION ITEMS/AREAS	AVAILABLE AND IN GOOD CONDITION	CORRECTIVE ACTION REQUIRED
PERSONAL SAFETY:		
Gloves		
Boots		
Coveralls		
Face Shields		
Respirators		
Eye Wash and Shower		
SPILL CONTROL:		
Absorbent Material		
Plastic Sheeting		
Brooms		
Shovels		
Empty Drums		
EMERGENCY RESPONSE:		
Fire Extinguishers		
Internal Communication		
External Communication		
HAZARDOUS WASTE DRUMS:		
Number In Storage:		
Drums Properly Labeled/Dated		
Not Leaking or Damaged		
DRUM STORAGE AREA:		
Warning Signs In Place		
Fence or Other Security Measures		
Curb, Drip Trays Or Other Means To Contain Spills		

Inspected By: _____ Date: _____
(Signature) Time: _____

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I. PACKAGING

Before Hazardous Waste can be transported or offered for transportation off-site, each Service Shop must package the waste according to Department of Transportation (DOT) regulations.

A. Containers

1. Hazardous Waste liquids must be shipped in DOT specification 17E - single trip containers (without removable heads).

2. Hazardous Waste solids must be shipped in DOT specification 17H - single trip containers (with removable heads).

3. Container specifications for acid wastes vary according to the type of acid. Whenever possible, acid wastes should be returned to their original containers for shipment.

B. Waste Hazard Classification

1. Hazardous Wastes must be segregated and shipped according to the following DOT Hazardous Classifications:

   a. Flammable Liquids
   b. Flammable Solids
   c. Oxidizers
   d. Poisonous Substances
   e. Corrosive Materials
   f. Other Regulated Materials (ORM-E)

2. If various materials of the same hazardous classification are mixed, then the major constituents and their approximate amounts must be identified.

II. LABELING AND MARKING

A. All Hazardous Wastes must be labeled and marked according to DOT regulations before they can be transported or offered for transportation. Exhibit 1 lists many of the Hazardous Wastes generated by Service Shops with their proper DOT Shipping Name, UN or NA Number, and DOT Labeling Requirements. This information is required for proper labeling of Hazardous Waste material. A complete listing of DOT hazardous materials can be obtained by ordering the following:

Hazardous Materials Table 172.101
Price: $3.50
The Operations Council
American Trucking Associations
1616 P Street, N.W.
Washington, D.C. 20036
Telephone: (202) 797-5438

B. If the Hazardous Waste is a specific material listed in the above tables, then the information provided should be used to properly mark and label the Hazardous Waste.

C. If the Hazardous Waste is a mixture of materials, then the following general categories should be used:

Proper DOT Shipping Name	DOT UN# or NA#
Waste Flammable Liquid, N.O.S. (not otherwise specified)	UN#1993
Waste Flammable Solid, N.O.S.	UN 1325
Waste Corrosive Liquid, N.O.S.	UN 1760
Waste Corrosive Solid, N.O.S.	UN 1759
Waste Oxidizing Material, N.O.S.	UN 1479
Waste Poisonous Liquid, N.O.S.	UN 2810
Waste Poisonous Solid, N.O.S.	UN 2811
Corrosive Liquid, N.O.S.	UN 2922
Corrosive Solid, N.O.S.	UN 1759
Hazardous Waste, Liquid, N.O.S.	UN 9189
Hazardous Waste, Solid, N.O.S.	UN 9189

D. Every Hazardous Waste container must have a Hazardous Waste label affixed to it. The Hazardous Waste label must contain the following information (see Exhibit 2):

1. Proper DOT shipping name
2. UN or NA number
3. General information
4. EPA ID number
5. EPA waste number
6. Accumulation start date
7. Manifest document number

E. In addition to the Hazardous Waste label, every Hazardous Waste container must have a DOT hazardous classification label affixed to it (see Exhibit 3).

III. PLACARDING

If the transporter does not already have the appropriate PLACARD(S) for marking the transport vehicle, the Service Shop is responsible for providing them to the transporter.

A. General Requirements

1. Hazardous Wastes must not be carried by trucks unless the carrier's company name and address are visibly identified.

2. All vehicles must be placarded on all four sides if they will be loaded with more than 1000 pounds of hazardous material. If only one hazard class is being shipped, the placard must specify the same hazard class label as that on the container of Hazardous Waste being transported. If two or more hazard classes are being transported on the same vehicle, the placard DANGEROUS must be used.

3. If more than 5000 pounds of materials in one Hazardous Waste class are loaded on the same vehicle, the placard corresponding to that hazard class must be used. When more than 5000 pounds of materials in each of two hazard classes are loaded on the same vehicle, the placard for each class must be applied.

4. The following table lists the hazard classes of materials, with the most hazardous ranking number (1):

(1) Radioactive Material
(2) Poison A
(3) Flammable Gas
(4) Non-Flammable Gas
(5) Flammable Liquid
(6) Oxidizer
(7) Flammable Solid
(8) Corrosive Material (Liquid)
(9) Poison B
(10) Corrosive Material (Solid)
(11) Irritating Materials
(12) Combustible Liquid (more than 110 gallons)
(13) ORM-B
(14) ORM-A
(15) Combustible Liquid (less than 110 gallons)
(16) ORM-E

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EXHIBIT I - HW-ASD-6.1

SERVICE SHOP HAZARDOUS WASTES

SERVICE SHOP HAZARDOUS WASTE	EPA HAZARD NO.	PROPER DOT SHIPPING NAME	DOT UN OR NA NO.	DOT LABEL	DOT HAZARD CODE	PACKAGING DRUM TYPE	PLACARD
Used Rags	D001	Waste Rags, Oily	UN1856	Flammable Solid	08	6A,6B,6C,17C 17E,17H,37A,37B 12B,21C	Flammable Solid
Solvents & Thinners							
Acetone	F003	Waste Acetone	UN1090	Flammable Liquid	07	5,5A,5B,5C,5M 17E,17C	Flammable
Cellosolve	D001	Waste Ethylene Glycol Monoethyl Ether	UN1171	Combustible Liquid	01	None	Combustible
Chlorothene NU	U226 F001	Waste 1,1,1-Trichloroethane	UN2831	ORM-E	12	None Specified	None
Chlorothene VG	U226 F001	Waste 1,1,1-Trichloroethane	UN2831	ORM-E	12	None Specified	None
Denatured Alcohol	D001	Waste Denatured Alcohol	NA1986	Flammable Liquid	07	5,5A,5B,5C,5M 17E,17C	Flammable
Ethyl Alcohol	D001	Waste Ethyl Alcohol	UN1170	Flammable	07	5,5A,5B,5C,5M 17E,17C	Flammable
Kerosene	D001	Waste Kerosene	UN1223	ORM-E	12	None Specified	Combustible
Methyl-Ethyl-Ketone (MEK)	U159 F005	Waste Methyl-Ethyl-Ketone	UN1193	Flammable Liquid	07	5,5A,5B,5C,5M 17E,17C	Flammable
Methylene Chloride	U080 F001	Waste Methylene Chloride	UN1593	ORM-E	12	None Specified	None

EXHIBIT I - HW-ASD-6.1

SERVICE SHOP HAZARDOUS WASTES

SERVICE SHOP HAZARDOUS WASTE	EPA HAZARD NO.	PROPER DOT SHIPPING NAME	DOT UN OR NA NO.	DOT LABEL	DOT HAZARD CODE	PACKAGING DRUM TYPE	PLACARD
Naptha (VM&P)	D001	Waste Naptha	UN2553	Flammable Liquid	07	5,5A,5B,5C,5M	Flammable
Naptha (Hi-Flash)	F003 F005	Waste Naptha	UN2553	ORM-E	12	None Specified	Combustible
Perclene Perk Perchlor Perchloroethylene	U210 F001	Waste Perchloroethylene	UN1897	ORM-E	12	None Specified	None
Safety Cleaner 150	U226 F001	Waste 1,1,1-Trichloroethane	UN2831	ORM-E	12	None Specified	None
Toluol/Toluene	U220 F005	Waste Toluene	UN1294	Flammable Liquid	07	5,5A,5B,5C,5M 17E,17C	Flammable
Trichloroethane III Triethane III 1,1,1-Trichloroethane	U226 F001	Waste 1,1,1-Trichloroethane	UN2831	ORM-E	12	None Specified	None
1,1,2-Trichloroethane	U227	Waste 1,1,2-Trichloroethane	None	ORM-E	12	None Specified	None
Trichloroethylene	D001	Waste Trichloroethylene	UN1710	ORM-E	12	None Specified	None
Varsol	D001	Waste Naptha	UN2553	Flammable Liquid	07	5,5A,5B,5C,5M 17E,17C	Flammable
Xylene, Xylol	U239 F003	Waste Xylene	UN1307	Flammable Liquid	07	5,5A,5B,5C,5M 17E,17C	Flammable

EXHIBIT I - HW-ASD-6.1

SERVICE SHOP HAZARDOUS WASTES

SERVICE SHOP HAZARDOUS WASTE	EPA HAZARD NO.	PROPER DOT SHIPPING NAME	DOT UN OR NA NO.	DOT LABEL	DOT HAZARD CODE	PACKAGING DRUM TYPE	PLACARD
SE75	F001	Hazardous Waste, Liquid N.O.S.	NA9189	ORM-E	12	None Specified	None
676	F001	Hazardous Waste, Liquid N.O.S.	NA9189	ORM-E	12	None Specified	None
AP755	F001	Hazardous Waste, Liquid N.O.S.	NA9189	ORM-E	12	None Specified	None
Solute 2101	F001	Hazardous Waste, Liquid N.O.S.	NA9189	ORM-E	12	None Specified	None
1500 Thinner 1511 F Thinner 1511 M Thinner 1514 Lacquer Thinner 6442 Thinner 9424 Thinner 75029 Thinner	D001	Waste Flammable Liquid NOS	UN1993	Flammable Liquid	07	5,5A,5B,5C,5M 17E,17C	Flammable
All Paints and Enamels	D001	Waste Paint,	UN1263	Flammable Liquid	07	5,5A,5B,5C,5M 17E,17C	Flammable
Paint Residue (Solidified)	D002	Hazardous Waste, Solid N.O.S.	NA9189	ORM-E	12	Same	Same
Adhesives & Epoxies 1276 Adhesive 1286 Adhesive 7057 Adhesive 880 Gasket Adhesive Pliobond	D001	Waste Adhesive	NA1133	Flammable Liquid	07	5A,5B,5C,5M,5 17E,17C	Flammable

EXHIBIT I - HW-ASD-6.1

SERVICE SHOP HAZARDOUS WASTES

SERVICE SHOP HAZARDOUS WASTE	EPA HAZARD NO.	PROPER DOT SHIPPING NAME	DOT UN OR NA NO.	DOT LABEL	DOT HAZARD CODE	PACKAGING DRUM TYPE	PLACARD
Adhesives & Epoxies							
3060 Casting Epoxy 3093 Sprayable Epoxy 5003 Epoxy Cement	D002	Waste Corrosive Liquid, N.O.S.	UN1760	Corrosive	02	37P	Corrosive
Fluxes							
115-5-51 Soldering Flux 294 Soldering Flux Stainless Steel Soldering Flux X-25 Soldering Flux	D001	Waste Combustible Liquid Liquid, N.O.S.	UN1993	Combustible Liquid	07	5,5A,5B,5C,5M, 17E,17C	Combustible
Acids							
Hydrochloric Acid	D002	Waste Hydrochloric Acid	UN1789	Corrosive	02	Use Original Container	Corrosive
Phosphoric Acid	D002	Waste Phosphoric Acid	UN1805	Corrosive	02	Use Original Container	Corrosive
Nitric Acid	D002	Waste Nitric Acid	NA1796	Corrosive	02	Use Original Container	Corrosive
Sulfuric Acid	D002	Waste Sulfuric Acid	UN1830	Corrosive	02	Use Original Container	Corrosive
Caustic Cleaners							
92XX Magnus Cleaner	D002	Waste Corrosive Liquid, NOS	UN1760	Corrosive	02	Use Original Container, 17E, 17H	Corrosive
215D Magnus Cleaner	D002	Waste Corrosive Liquid, NOS	UN1760	Corrosive	02	Use Original Container, 17E, 17H	Corrosive

EXHIBIT I - HW-ASD-6.1

SERVICE SHOP HAZARDOUS WASTES

SERVICE SHOP HAZARDOUS WASTE	EPA HAZARD NO.	PROPER DOT SHIPPING NAME	DOT UN OR NA NO.	DOT LABEL	DOT HAZARD CODE	PACKAGING DRUM TYPE	PLACARD
Alkaline Cleaners 114 Magnus Cleaner 147X Magnus Cleaner 92S Magnus Cleaner 26N Magnus Cleaner	D002	Waste Alkaline Liquid, N.O.S.	NA1719	Corrosive	02	Use Original Container,17E, 17H	Corrosive
NDT Materials SKC-NF Cleaner/Remover ZP-9 Zyglo Form B Developer ZC-7 Zyglo Form B Cleaner/Remover	F002	Hazardous Waste Liquid, NOS	NA9189	ORM-E	12	None Specified	None
14AM Magna Glo Prepared Bath	D001	Waste Flammable Liquid	UN1993	Flammable Liquid	07	5,5A,5B,5C,5M 17E,17C	Flammable
Flame Spray Wet Sludge	D007	Hazardous Waste, Solid, N.O.S.	UN9189	ORM-E	12	None Specified	None
Miscellaneous							
Insulation-Transformer Leads (Clear & Dark)	D001	Hazardous Waste Liquid, NOS	UN1993	Flammable Liquid	07	5,5A,5B,5C,5M	Flammable
SS-3 Stainless Steel Cleaner	D002	Waste Corrosive Liquid, Cleaning Compound	UN1760	Corrosive	02	37P,17H,17C,21P 37A,17E,34,37B, 17F	Corrosive
3068 Texo-Brite (Chromic Acid Solution)	D002	Waste Chromic Acid Solution	UN1755	Corrosive	02	Do Not Mix 17E Check Regulations	Corrosive

EXHIBIT I - HW-ASD-6.1

SERVICE SHOP HAZARDOUS WASTES

SERVICE SHOP HAZARDOUS WASTE	EPA HAZARD NO.	PROPER DOT SHIPPING NAME	DOT UN OR NA NO.	DOT LABEL	DOT HAZARD CODE	PACKAGING DRUM TYPE	PLACARD
Ferric Chloride (Powder)	D002	Waste Ferric Chloride Solid	UN1773	ORM-E	12	Use Original Container	None
Cupric Sulfate (Powder)	D002	Waste Cupric Sulphate	NA9109	ORM-E	12	Use Original Container	None
PH6297 Rust Ban EG6565 Rust Ban	D001	Waste Paint	UN1263	Flammable Liquid	07	5,5A,5B,5C,5M 17E,17C	Flammable
Formex Gel	D002	Waste Formic Acid	NA1779	Corrosive	02	37P,17H,17C,21P, 37A,17E,34, 37B, 17F	Corrosive
#2 Form-A-Gasket Cement	D001	Waste Cement, Liquid, N.O.S.	NA1133	Flammable Liquid	07	5,5A,5B,5C,5M, 17E,17C	Flammable
65382 Battery Cleaner 65376 Silicone Lube 65379 White Grease 69954 Open Gear Lube	D001	Waste Flammable Liquid, NOS	UN1993	Flammable Liquid	07	5,5A,5B,5C,5M 17E,17C	Flammable
Butyl Alcohol	U031	Waste Butyl Alcohol	NA1120	Flammable Liquid	07	5,5A,5B,5C,5M 17E,17C	Flammable
Aqua Ammonia 26	D002	Waste Corrosive Liquid, NOS (Ammonia Compound)	UN1760	Corrosive	02	Use Original Container	Corrosive
Rapid Fixer Solution A Rapid Fixer Solution B Rust-I-Cide Klean Crete	D002	Waste Corrosive Liquid, N.O.S.	UN1760	Corrosive	02	Use Original Container	Corrosive

EXHIBIT I - HW-ASD-6.1

SERVICE SHOP HAZARDOUS WASTES

SERVICE SHOP HAZARDOUS WASTE	EPA HAZARD NO.	PROPER DOT SHIPPING NAME	DOT UN OR NA NO.	DOT LABEL	DOT HAZARD CODE	PACKAGING DRUM TYPE	PLACARD
Ammonium Hydroxide	D002	Waste Ammonium Hydroxide	NA2672	Corrosive	02	5,5A,5B,5C,5M 5O,5H,17C,17E 17F,37P	Corrosive
2-Butanone Peroxide	P019	Hazardous Waste, Liquid or Solid, N.O.S.	NA9189	ORM-E	12	17C,17E,17H	None Specified
Cyanides	P030	Waste Cyanide Solution	UN1935	Poison	15	5,5A,5B,17E, 37B	Poison
2-Cyclohexy-4,6-Dinitrophenol	P034	Hazardous Waste, Liquid or Solid, N.O.S.	NA9189	ORM-E	12	17C,17E,17H	None Specified
2,4-Dichlorophenoxyacetic Acid	P035	Waste 2,4-Dichlorophenoxy-acetic Acid	NA2765	ORM-E	12	17C,17E,17H	None Specified
O,O-Diethyl-O-(2-Pyrazinyl) Phosphorothionate	P040	Hazardous Waste, Liquid or Solid, N.O.S.	NA9189	ORM-E	12	17C,17H,17E	None Specified
4,6-Dinitro-O-Cresol and Salts	P047	Hazardous Waste, Liquid or Solid, N.O.S.	NA9189	ORM-E	12	17C,17H,17E	None Specified
2,4-Dithiobiuret	P049	Hazardous Waste, Liquid or Solid, N.O.S.	NA9189	ORM-E	12	17C,17H,17E	None Specified
Methyl Parathion	P071	Waste Methyl Parathion	NA2783	Poison	15	5,5A,5B,17C 17E	Poison
Phenyl Dichloroarsine	P091	Waste Phenyl Dichloroarsine	NA1556	Poison	15	5A 30 Gallon Limit	Poison
Phenyl Mercaptan	P091	Waste Phenyl Dichloroarsine	NA1556	Poison	15	5A 30 Gallon Limit	Poison

EXHIBIT I - HW-ASD-6.1

SERVICE SHOP HAZARDOUS WASTES

SERVICE SHOP HAZARDOUS WASTE	EPA HAZARD NO.	PROPER DOT SHIPPING NAME	DOT UN OR NA NO.	DOT LABEL	DOT HAZARD CODE	PACKAGING DRUM TYPE	PLACARD
Potassium Cyanide	P098	Waste Potassium Cyanide Solution or Solid	UN1680	Poison	15	5,5A,5B, 17E Liquid 17H Solid	Poison
2-Propyn-1-ol	P102	Hazardous Waste, Liquid or Solid, N.O.S.	NA9189	ORM-E	12	17C,17H 17E	None
Silver Cyanide	P104	Waste Silver Cyanide	UN1684	Poison	15	5,5A,5B 17E (Liquid) 17H (Solid)	Poison
Strontium Sulfide	P107	Hazardous Waste, Liquid or Solid, N.O.S.	NA9189	ORM-E	2	17C,17H,17E	None
Sodium Cyanide	P106	Waste Sodium Cyanide	RQ 10/4.54 UN1689	Poison	15	5,5A,5B, 17E (Liquid) 17H (Solid)	Poison
Vanadium Pentoxide	P120	Waste Vanadium Pentoxide	RQ 1000/454 UN2862	ORM-E	12	17C,17H,17E	None
2861 Permafil 3332 Permafil Catalyst 9858 Catalyst X-25 Soldering Flux	D001	Waste Oxidizing Material N.O.S.	UN1479	Oxidizer	13	6,6A,6B,6C, 17C,17E,17H 37A,37B	Oxidizer

EXHIBIT 2 - HW-ASD-6.1

HAZARDOUS WASTE LABEL

HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL

IF FOUND, CONTACT THE NEAREST POLICE, OR
PUBLIC SAFETY AUTHORITY, OR THE
U.S. ENVIRONMENTAL PROTECTION AGENCY

PROPER D.O.T.
SHIPPING NAME _____ UN OR NA# _____

GENERATOR INFORMATION:

NAME _____

ADDRESS _____

CITY _____ STATE _____ ZIP _____

EPA
ID NO. _____

EPA
WASTE NO. _____

ACCUMULATION
START DATE _____

MANIFEST
DOCUMENT NO. _____

HANDLE WITH CARE!

CONTAINS HAZARDOUS OR TOXIC WASTES

STYLE WM-6

EXHIBIT 3 - HW-ASD-6.1

DOT HAZARDOUS CLASSIFICATIONS

I. FACILITIES SHIPPING HAZARDOUS WASTES

A. A manifest form must be prepared for all shipments of Hazardous Waste. The Federal Uniform Hazardous Waste Manifest or state equivalent must be used. This form must designate a receiving facility that holds an EPA Approved Permit to receive Hazardous Waste for storage, treatment, or disposal. (If an emergency prevents delivery to the primary designated facility, an alternate facility that is permitted to receive the waste may also be designated.)

II. REQUIRED INFORMATION

The manifest form must contain all of the following information:

A. Manifest document number.

B. Generator's name, mailing address, telephone number, and EPA Identification Number.

C. Name and EPA Identification Number of each transporter that will be involved in the shipment.

D. Name, address, and EPA Identification Number of the designated storage, treatment, or disposal facility.

E. Description of the wastes (e.g., proper shipping name, etc.) according to the U.S. Department of Transportation regulations.

F. Total quantity by units of weight or volume of each Hazardous Waste and the type and number of containers loaded onto the transport vehicle.

G. Generators Certification Statement.

III. GENERATOR REQUIREMENTS

The generator must do the following when shipping:

A. Use either the Federal Uniform Manifest or State Manifest where required.

B. Sign the manifest certification.

C. Obtain the dated signature of the initial transporter on the manifest form.

D. Retain one copy of the manifest form for three years or until a signed copy is received from the designated facility that received the waste. This signed copy must be retained as a record for at least three years from the date the waste was accepted by the initial transporter.

E. Give the transporter the remaining copies of the manifest form.

F. Obtain a copy of the manifest form from the designated storage, treatment, or disposal facility with the signature of the owner or operator within 35 days of the date the waste was accepted by the initial transporter. If this copy is not received within 35 days, determine the status of the Hazardous Waste by contacting the transporter and/or the designated storage, treatment, or disposal facility. If a copy of the signed manifest form still has not been received, file an Exception Report (see HW-ASD-11.1) with the appropriate EPA Regional Administrator within 45 days of the date the waste was accepted by the initial transporter.

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EXHIBIT 1 - HW-ASD-7.1

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

Form Approved. OMB No. 2000-0404. Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. | Manifest Document No.

2. Page 1 of | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address

4. Generator's Phone ( )

5. Transporter 1 Company Name | 6. US EPA ID Number

7. Transporter 2 Company Name | 8. US EPA ID Number

9. Designated Facility Name and Site Address | 10. US EPA ID Number

A. State Manifest Document Number

B. State Generator's ID

C. State Transporter's ID

D. Transporter's Phone

E. State Transporter's ID

F. Transporter's Phone

G. State Facility's ID

H. Facility's Phone

GENERATOR

11. US DOT Description *(Including Proper Shipping Name, Hazard Class, and ID Number)*	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.					
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.

Printed/Typed Name | Signature | Month Day Year

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Month Day Year

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name | Signature | Month Day Year

EPA Form 8700-22 (Rev. 4-85) Previous edition is obsolete.

I. GENERAL

All shops must have a Contingency Plan to minimize human health and environmental hazards that might result from fires, explosions, disasters, or other Emergency Incidents that could release Hazardous Waste into the air, soil, or surface water. The Contingency Plan must contain the following items:

A. Description of the action shop personnel must take in response to fires, explosions, disasters, or other incidents that could release Hazardous Waste into the air, soil, or surface water.

B. Description of arrangements made with local police, fire departments, and hospitals for assistance in any emergency.

C. List of names, addresses, and telephone numbers of the shop emergency coordinator and alternates.

D. Evacuation plans for shop personnel, including a description of alarm systems and alternate evacuation routes.

II. DISTRIBUTION OF PLAN

An up-to-date copy of the Contingency Plan must be maintained at the shop and at the off-site emergency centers (e.g., police and fire departments, hospitals).

III. AMENDMENT OF PLAN

The Contingency Plan must be reviewed and amended, as required, whenever one or more of the following conditions occur:

A. Applicable regulations are revised.

B. The plan fails to result in satisfactory response to an emergency.

C. The shop changes in a way that increases the potential for an emergency or changes the response necessary in an emergency.

D. The list of emergency coordinators changes.

E. The list of required emergency equipment changes.

IV. EMERGENCY COORDINATOR

An emergency coordinator must be on site or on call at all times. The emergency coordinator must be thoroughly familiar with the Contingency Plan and must have the authority to implement the Contingency Plan.

V. EMERGENCY PROCEDURES

In an imminent or actual emergency, the emergency coordinator or his alternate must perform the following duties:

A. Activate internal alarms.

B. Notify appropriate agencies (e.g., fire, police, and hospitals) if required, as documented in the Contingency Plan.

C. Take measures to ensure that fires, explosions, and releases of Hazardous Waste do not occur or spread.

D. Take action to contain, treat, or dispose of recovered waste and contaminated soil or surface water that result from any emergency.

E. Identify the characteristics and amount of material released into the environment.

F. Assess possible human health or environmental hazards.

G. Report his findings to the following:

1. Local authorities.

2. Government agencies or the National Response Center.

H. After clean-up procedures have been completed, ensure that emergency equipment listed in the Contingency Plan is cleaned and in operating condition.

VI. RESUMPTION OF OPERATIONS

Before commencing operations in any shop area that had been shut down due to an emergency, the Emergency Coordinator or his delegate must notify the EPA Regional Administrator and state and local authorities that appropriate clean-up action has been completed.

VII. OPERATING RECORDS

The shop must include in its operating record the time, date, and details of any incident requiring implementation of the Contingency Plan and must submit a written report to the EPA Regional Administrator within 15 days after the incident occurred. This report must include the following information:

A. Name, address, and telephone number of the shop.

B. Date, time, and type of incident (e.g., fire, explosion).

C. Name and quantity of material(s) involved.

D. Extent of injuries, if any.

E. Assessment of actual or potential hazards to human health or to the environment.

F. Estimated quantity and disposition of recovered material resulting from the incident.

VIII. CONTINGENCY AND EMERGENCY PROCEDURES PLANS

A. Exhibit 1 is a sample Hazardous Waste Contingency and Emergency Procedures Plan which must be completed for each facility. A current copy of this plan must be maintained on file at all times.

B. Exhibit 2 provides a general Emergency Procedure that can be modified to suit individual service shops for compliance with evacuation and emergency requirements.

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EXHIBIT 1 - HW-ASD-8.1

HAZARDOUS WASTE

CONTINGENCY PLAN

AND

EMERGENCY PROCEDURES PLAN

FOR

GENERAL ELECTRIC COMPANY

_____

_____

EPA I.D. NO.: _____

HAZARDOUS WASTE PERMIT NO.: _____

OWNER NAME AND ADDRESS: _____

(If different from above) _____

I. CONTACTS--GENERAL ELECTRIC

A. Emergency Coordinator

Name: _____

Home Address: _____

Home Phone: _____

Work Phone: _____

B. Alternate Emergency Coordinator

Name: _____

Home Address: _____

Home Phone: _____

Work Phone: _____

C. Shop Manager

Name: _____

Home Address: _____

Home Phone: _____

Work Phone: _____

II. EMERGENCY CONTACTS

A. Police Department Phone No. _____

B. Fire Department Phone No. _____

C. Ambulance Service Phone No. _____

D. Emergency Pollution Response Unit Phone No. _____

III. REGULATORY AGENCIES

A. Local _____

_____

_____

Phone No. _____

B. State _____

_____

_____

Phone No. _____

C. Federal EPA Regional Administrator _____

_____

Phone No. _____

D. Coast Guard _____

_____

Phone No. _____

E. National Response Center Phone No. 800-424-8802

IV. GENERAL DESCRIPTION OF FACILITIES

A. Type of Manufacturing: Repair of industrial equipment

_____

B. Type of Buildings: _____

_____

C. Number of Buildings: _____

D. Location of Plant: _____

_____

E. Types of Materials Handled: Flammable liquids, flammable solids, corrosive liquids, corrosive solids, toxic chemicals

F. Previous Emergency Incidents: (Describe briefly any Hazardous Waste spills that occurred at this location.)

G. Potential for Emergency Incidents: (Describe briefly conditions in Hazardous Waste areas that could increase the potential for an incident, e.g., storm sewers, heavy truck traffic, waterways adjoining property.)

V. PLOT PLAN. Indicate Hazardous Waste treatment, storage, and disposal areas on an attached sketch of the shop site. Also, show all buildings.

VI. EMERGENCY PROCEDURES. The emergency procedures required in the event of a spill, fire, explosion or other incident that could release Hazardous Waste into the air, soil, or surface water are as follows:

A. Area Operator. The Area Operator (a key hourly person) is the first line of defense in mitigating spills, fires, explosions, etc. The Area Operator is trained to respond to emergencies in his particular area.

In case of an emergency incident, the Area Operator will immediately:

1. Notify the Area Foreman.

2. Take action to control or shut down equipment that is contributing to the incident or could possibly contribute to the incident.

3. Contain the emergency incident e.g., use absorbents for spills and portable fire extinguishers for fires.

B. Area Foreman. The Area Foreman will take action to mitigate the incident, evaluate the situation, and call for assistance, if needed. The Area Foreman has been trained to respond to emergency situations in his area.

In case of an emergency incident, the Area Foreman will immediately:

1. Evacuate the area except for personnel performing emergency functions.

2. Notify the Emergency Coordinator.

3. Direct other personnel to the emergency as needed.

C. Emergency Coordinator. The Emergency Coordinator is responsible for coordinating plant-wide response to emergency incidents. The Emergency Coordinator or his alternate is available 24 hours a day, 7 days a week. The Emergency Coordinator is responsible for training plant personnel in all aspects of emergency incidents e.g., Hazardous Waste spills, fires, explosions, personal injuries, evacuation procedures, and interfacing with police and fire departments, hospitals, and regional emergency response teams.

In case of an emergency incident, the Emergency Coordinator or his alternate will immediately:

1. Notify the fire and emergency response team.

2. Notify the Shop Manager.

3. Notify the Manager of Manufacturing Engineering.

4. Notify fire and police departments, hospitals, and regional emergency response teams, if needed.

5. Notify the proper local, state, and federal agencies, if required.

D. Fire and Emergency Response Team. The Fire and Emergency Response Team includes personnel who are trained to cope with Hazardous Waste spills, fires, explosions or other Hazardous Waste incidents. They will have available equipment necessary to contain the emergency; e.g., absorbent material, shovels, fire extinguishers, rubber gloves, face masks, etc.

In case of an emergency incident, the Fire and Emergency Response team will immediately:

1. Proceed to the emergency site.

2. Take the necessary action to mitigate the emergency.

3. Determine if additional Emergency Services are required.

4. Contain the incident.

5. Clean up the area after the emergency is contained.

VII. AGREEMENTS WITH LOCAL POLICE, FIRE DEPARTMENTS, HOSPITALS AND EMERGENCY RESPONSE CONTRACTORS

A. Police. Police are available to direct traffic, handle crowds, and provide security services. Police have a copy of the Contingency Plan and Emergency Procedures Plan.

B. Fire Department. The Fire Department will respond to fires and other emergency incidents providing back-up fire protection and rescue services. The Fire Department has a copy of the Contingency Plan and Emergency Procedures Plan.

C. Hospital. The hospital is available to provide medical service. The hospital has a copy of the Contingency Plan and Emergency Procedures Plan.

D. Emergency Response Contractor. The following contractor is familiar with the plant and is available to provide 24 hour, 7 days a week, back-up service to plant organizations. This contractor has a copy of the Contingency Plan and Emergency Procedures Plan:

Name _____

Address _____

Telephone _____

VIII. MEASURES TO PREVENT THE ESCAPE OF HAZARDOUS WASTES INTO THE ENVIRONMENT

A. Drum Storage Area

1. All drums are inspected once a week for:

   a. Leaks
   b. To ensure that lids and bungs are in place
   c. To ensure that markings are proper.

2. The storage area has:

   a. Inspection aisles
   b. A spill kit available
   c. Records available and up-to-date
   d. Security measures in place.

B. Other Hazardous Waste Facilities
(List here other facilities and procedures used to prevent the escape of wastes into the environment e.g., surface impoundment or septic system for industrial waste water.)

_____

_____

_____

_____

_____

IX. EVACUATION PLAN

All personnel will be thoroughly familiar with the alarm system and the evacuation plan with alternate routes. The evacuation plan should be posted conspicuously. The evacuation plan should be a block layout of the facility showing all exits, aisles, and alarm stations and preferred exit routes for personnel during any evacuation.

X. MINIMUM EMERGENCY EQUIPMENT

In the event of a Hazardous Waste emergency, the shop should have the following minimum emergency equipment available for protection of the personnel, facilities, and environment.

A. Personal Protective Equipment Kit (designate location of equipment)

1. Safety Goggles
2. Face Shields
3. Rubber Gloves
4. Rubber Boots
5. Respirator
6. Disposable Coveralls

B. Spill Kit (designate location of equipment)

1. Empty 55 gallon 17H drums (2)
2. Absorbent material (enough to absorb 55 gallons of liquid)
3. Shovels
4. Rags
5. Brooms
6. Plastic Sheets

C. Fire Protection

1. Portable fire extinguishers--designate quantity and general location (e.g., building columns--4 per bay)
2. Fire hoses and connections (if applicable)

D. Emergency Alarm System

1. Internal alarm (specify type)
2. External communication (specify types)

Prepared by: _____ Date: _____
(Name and Title)

Approved by: _____ Date: _____
(Manager-Mfg. Engineering)

Approved by: _____ Date: _____
(Emergency Coordinator)

Approved by: _____ Date: _____
(Shop Manager)

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EXHIBIT 2 - HW-ASD-8.1

SERVICE SHOP EMERGENCY PROCEDURES

I. EMERGENCY CONTROL

A. In the event of an emergency, where it is feasible to remain on the premises without unduly endangering plant personnel, the following procedure will be followed:

1. An Emergency Control Center will be established at the (location within shop) _____.

2. The Emergency Coordinator will report immediately to the Emergency Control Center.

3. The shop Emergency Team will report immediately to the Emergency Control Center.

4. Maintenance and engineering personnel will report immediately to the Emergency Control Center.

B. In the event of an emergency where it is necessary to evacuate the shop building(s), the following procedure will be followed:

1. An alternate Emergency Control Area will be established at (outside location-shop vicinity) _____.

2. The Emergency Coordinator will report immediately to the alternate Emergency Control Area where he will designate individuals to contact the fire department, police department, and ambulance services required.

3. Each foreman and supervisor will be responsible for ensuring that all personnel have vacated their area of responsibility. Then they will report to the Emergency Coordinator at the Emergency Control Area.

4. The shop Emergency Team will report immediately to the Emergency Control Area.

5. Maintenance and engineering personnel will report immediately to the Emergency Control Area.

II. FIRE

A. The foreman whose area requires fire department assistance will perform the following activities:

1. Activate internal alarms.

2. Call the fire department.

3. Assign a person to the shop entrance to direct the firemen to the scene of the emergency.

4. Assign fire-fighting personnel to fight the fire with the use of fire extinguishers and/or fire hoses. Caution should be used not to over commit shop fire-fighting activities to the extent that shop personnel are endangered. If in doubt, evacuate the area and wait for the fire department.

5. Notify the Emergency Coordinator of the Emergency.

B. The Emergency Coordinator will perform the following activities:

1. Notify the Shop Emergency Team and take charge of shop fire-fighting activities.

2. Notify the fire department, police department, ambulance services, and emergency response teams as required.

3. Assign personnel to isolate electrical power and shop gas and fuel supplies as required.

4. Assign personnel to move material away from the path of fire or from possible water damage.

5. Evacuate personnel from areas of potential danger.

6. After the fire, direct and assign people to secure the area and perform clean-up activities.

III. SPILL RESPONSE ACTION

A. Small Spills

1. Drum quantities of hazardous waste shall be handled within the Shop such that no material is spilled from them. Care should be exercised to prevent puncture, spillover or inadvertent dumping.

2. Sufficient quantities of absorbent material shall be kept in the Shop to be used in the event of a small spill. When a spill occurs, steps should be taken to prevent spillage from entering a sewer or storm drain. Absorbent material shall be spread over the spilled hazardous waste in sufficient quantity to absorb the material.

3. The absorbent shall be collected and disposed of in a proper manner.

   At no time should hazardous waste be washed down any drain.

4. A spill is considered small if shop personnel can contain and control the material as described above and providing no hazardous wastes reach a waterway or sewer system.

B. Larger Spills

In the event of a hazardous waste spill into a waterway or sewer system, action shall be taken to remove the material, if possible. Such action should occur after notification of the responsible agencies and with their full concurrence.

In the event of such a spill:

1. An examination of the affected waterway should be made by Shop personnel to determine what steps are necessary. If the spill is into a sewer system, the operators of that system should be notified.

2. If a spill should occur into a waterway that requires cleanup action beyond the capabilities of the Shop personnel, then the services of a reputable spill removal contractor should be engaged.

   Contractors in the _____ area include:

	Contractor No. 1	Alternate
Name of Firm	_____	_____
Address	_____	_____
	_____	_____
Telephone A/C	___ - _____	___ - _____

IV. CIVIL DISTURBANCE

In the event of a civil disturbance, the Emergency Coordinator will direct the following activities:

1. Ensure that all personnel have vacated areas with external doors or windows.

2. Close and lock all gates providing access to the shop property.

3. Move as much company/customer equipment as is practical inside the building.

4. Close and lock all exterior building doors and windows.

5. Activate all exterior alarm systems.

6. Alert shop personnel that an emergency condition exists and that emergency procedures are to be immediately followed.

7. Notify the police department.

V. BOMB THREAT

In the event that a bomb threat is received, the following action will be taken:

1. The person receiving the threat will attempt to obtain as much information as possible in accordance with the guidelines detailed in Employee Relations Information letter ERIL 68-19D.

2. The person receiving the threat will immediately notify the shop manager or acting manager.

3. The shop manager or acting manager will notify the police department. Subsequent action will be taken in conjunction with the police department and in accordance with emergency procedures.

VI. EVACUATION OF PREMISES

In the event that evacuation of the building(s) becomes necessary, the Emergency Coordinator will direct any of the following activities judged necessary by the nature of the emergency.

1. Notify the police department of evacuation activity and obtain their assistance in providing the safest route for evacuation from the general area.

2. Activate external alarm systems.

3. Assign personnel to direct traffic to leave Company property in an orderly, coordinated manner.

4. Utilize all available shop vehicles and personal cars to provide all personnel with transportation away from Company property.

5. Remove all essential records from the building(s).

6. Shut down building utilities that will not be required.

7. If caretaker activities are required, select at least two volunteers to remain as plant caretakers.

8. Close and lock all perimeter fence gates.

9. Close and lock all exterior doors and windows.

10. Notify the police department of the condition of the premises.

11. Notify the fire department of the condition of the premises.

12. In the event that access to the shop is not available, predetermine a satellite Emergency Control Center.

VII. Service Shop Fire and Emergency Response Teams

(Requires annual review and revision)

The following individuals are assigned to the shop's fire and Emergency Response Team. These individuals are familiar with the shop's Emergency Procedures and have received training in the use of shop fire-fighting equipment and/or Hazardous Waste spill containment and clean up. Designated individuals are familiar with the shop's utilities and with the proper procedures for shop power isolation and the shutdown of fuel supplies.

_____

_____

_____

_____

Prepared by _____
Emergency Coordinator

Date of last revision _____

I. GENERAL

The EPA requires that a plan be on file to insure the orderly shutdown of a facility in the event of a decision by management to cease operations. Only shops that have applied for permits to store Hazardous Waste for more than 90 days or that dispose of Hazardous Waste on-site are required to prepare a Closure Plan.

II. CLOSURE PERFORMANCE STANDARD

Any storage, treatment, or disposal facility must be closed in a manner that minimizes the need for maintenance, and minimizes or eliminates the potential for the escape of Hazardous Wastes into the groundwater, surface water, or atmosphere.

III. CLOSURE PLAN

A. A written closure plan must be prepared and available at each facility. The plan shall follow the format of Exhibit I and must include the following information:

1. Description of the steps required to decontaminate facility equipment and remove Hazardous Wastes.

2. Estimate of the waste treatment and storage inventory during the life of the facility.

3. Schedule for final closure.

B. The closure plan must be amended any time changes in the operating plans or facility design affect the plan.

C. The closure plan must be submitted to the EPA Regional Administrator 180 days before closure.

IV. CERTIFICATION OF CLOSURE

When closure has been completed, certification that the approved closure plan was followed must be signed by a Professional Engineer and submitted to the EPA Regional Administrator by the owner.

V. FINANCIAL REQUIREMENTS

A. On or before May 19, 1981, the owner/operator must have a written estimate of the closure costs.

The cost estimate for closure and post closure must be revised each May to adjust costs for inflation.

IV. SAMPLE SERVICE SHOP CLOSURE PLAN

A sample service shop closure plan is shown as Exhibit 1.

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EXHIBIT I - HW-ASD-9.1

CLOSURE PLAN

Name and Address: General Electric Company
1234 Cheltingham Avenue
Electric City, Ohio 12538

EPA I.D. No.: _____

Hazardous Waste Permit No.: _____

Owner Name and Address:
(If facility is leased) _____

_____

_____

Type of Facility: (Storage) _____
(Storage, Treatment or Disposal)

Facility Description:

1. This facility contains a fenced-in drum storage area capable of storing drums of the following types of hazardous wastes:

   Flammable liquids
   Flammable solids
   ORM-E liquids
   ORM-E solids
   Corrosive liquids
   Corrosive solids
   Acids
   Oxidizers
   Poisons

2. There is/are (qty.) underground storage tank(s) capable of holding (qty.) gallons of alkaline waste water and oily sludge from the cleaning operation.

Closure Plan:

1. All drums of Hazardous Wastes will be removed from the storage area and shipped to the appropriate treatment or disposal facility.

2. All Hazardous Waste residues will be absorbed with absorbent material (speedi-dry) and placed in drums for disposal. The area will be scrubbed down, rinsed, and rinsings absorbed with absorbent material (speedi-dry) for disposal in drums.

3. The underground tank will be pumped into a tank truck or drums, rinsed with cleaners, and all rinsings pumped into the tank truck or drums for appropriate disposal.

Schedule:

This storage facility will remain active during the life of the business.

Financial Requirements:

Based on $_____ per drum for the drum storage and $_____ per gallon for the underground tank, closure costs are estimated to be:

_____ drums x $_____ per drum = $_____
(Qty. of drums normally in storage)

_____gallons x $_____ per gallon = $_____
(Capacity of tanks)

Total closure costs = $_____

Post-Closure Plan:

Not applicable to a storage facility.

Written by: _____
(Name and Title)

Approvals: _____
(Shop Manager)

_____
(Professional Engineer)

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I. TRAINING REQUIREMENTS

A. EPA Hazardous Waste regulations require that all Service Shop personnel complete a training program on Hazardous Waste Control. This program may be presented as either formal classroom instruction or specific on-the-job training. The Hazardous Waste Control Training Program must be designed to ensure that shop personnel are familiar with procedures and equipment so that they can effectively respond to emergencies. Shop personnel must complete such training programs on an annual basis.

B. Each Service Shop must designate by name and title at least one individual who is responsible for Hazardous Waste management. The written job description for this individual must include the following responsibilities:

1. Hazardous material identification
2. Shop Hazardous Waste control
3. Emergency activities
4. Hazardous Waste training
5. Inspection and recordkeeping

C. In shops where the responsibilities listed above are assigned to more than one individual, each responsibility must be designated in the job description and job title for each individual involved.

II. TRAINING PROGRAM

A. All Service Shop personnel must be familiar with the EPA Hazardous Waste regulations and the shop's Hazardous Waste control and emergency procedures. It is recommended that shop meetings be held to communicate this information to all personnel. Attendance at these meetings should be recorded and maintained on file as documentation of the shop's Hazardous Waste training activity. New personnel must be instructed in Hazardous Waste control and emergency procedures as they are hired.

B. For positions specifically involving Hazardous Waste management activities, additional training should be provided and documented. This includes the following activities:

1. Purchasing--Hazardous Material Identification
2. Maintenance--Hazardous Waste Collection and Storage
3. Shipping--Hazardous Waste Manifest System
4. Foremen--Hazardous Waste Control Procedures
5. Emergency Response Teams--Emergency Procedures and Activities

III. ANNUAL REVIEW

All service shop personnel must take part in an annual review of the initial training. Attendance at this review must be recorded and maintained as documentation of training activity.

An ASD prepared slide/tape presentation has been prepared for the annual hazardous waste training. This program may be used to complete the required hazardous waste training.

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EXHIBIT 1 - HW-ASD-10.1

_____ SERVICE SHOP

HAZARDOUS WASTE MANAGEMENT RESPONSIBILITY AND TRAINING

_____, _____, is responsible for the administration of hazardous waste management at the _____ Service Shop. These duties include the establishment and maintenance of procedures and records as defined in the ASBD Hazardous Waste Management Manual and the regulations of the State of _____ for the following hazardous waste activities:

- Material Analysis
- Facility Requirements
- Shop Floor Control
- Inspection
- Manifests
- Contingency and Emergency
- Training

_____, _____, is responsible for the identification of stock materials which will require hazardous waste control when discarded.

_____, _____, is responsible for compliance with shop floor procedures for the accumulation and segregation of hazardous wastes.

_____, _____, is responsible for the collection and proper storage of hazardous wastes.

_____, _____, is responsible for the preparation of manifests for the shipment of hazardous wastes.

_____, _____, is designated as the Emergency Coordinator with the authority and responsibility for the implementation of contingency and emergency procedures.

The above individual(s) are familiar with the hazardous waste requirements as defined in the ASD Hazardous Waste Management Manual and in the _____ Service Shop procedures.

The shop employees have received training on hazardous waste regulations and on the _____ Service Shop's hazardous waste management procedures. Training is conducted by _____ at in-shop employee training sessions and records of these training sessions are maintained in the Hazardous Waste Training File.

(Any additional training activities such as attendance at Division RCRA Seminars, etc. should be documented.)

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I. REQUIRED RECORDKEEPING

A file should be immediately established to maintain all Hazardous Waste records. Records that are required to be kept on file are listed below:

A. Operating Record

Each EPA permitted service shop must keep a written operating record (see Exhibit 1) containing the following information:

1. Description, quantity, and location of each Hazardous Waste at the facility.

2. Description, quantity, and date each Hazardous Waste is received from another location.

3. Cross reference to the specific manifest number and EPA I.D. number of the generator.

B. Hazardous Waste Analysis Records

All shops are required to keep records on the data used to identify Hazardous Wastes. These records should include Material Safety Data Sheets, specific vendor material information, and physical and chemical testing results.

C. Inspection Records

EPA permitted shops must keep inspection reports for three years. (See Section IV.)

D. Training Records

All service shops must maintain a record of each assigned individual, with title and written job description, for each position related to Hazardous Waste management. The type and amount of training provided to each assigned individual must also be included. Training records must be reviewed and updated annually and must be maintained for at least three years after the employee terminated work at the shop.

E. Manifest Records

1. A signed copy of the manifest form received from the storage, treatment, or disposal facility must be kept for three years from the date the Hazardous Waste was accepted.

2. A copy of the manifest form for all waste received for storage from non-permitted shops must be kept for three years from the date the Hazardous Waste was received.

3. A copy of the manifest form for all Hazardous Waste transported on shop trucks must be kept for three years from the date the waste was accepted.

F. Closure and Post-Closure Cost Estimates

(See Section VIII, Exhibit 1.)

G. Emergency Records

Summary records and details of all incidents requiring implementation of the Contingency Plan must be completed and maintained on file. (See Section VII.)

II. REQUIRED REPORTS

A. Biennial Report

Every generator of hazardous waste must prepare and submit an Biennial Report to the appropriate EPA Regional Administrator. These reports must be submitted by March 1, beginning in 1982, and should cover the Hazardous Waste activities of the previous calendar year. Service Shops that are identified as generators and transporters only must submit the Generator Biennial Report . EPA Permitted Storage and Disposal Shops must submit the Facility Biennial Report.

B. Manifest Form Discrepancy Report

Significant discrepancies in the quantity or type of Hazardous Waste designated on the manifest form and the actual waste received must be reported within 15 days after the waste has been received if the discrepancy cannot be resolved. Significant discrepancies in quantity are (1) for bulk waste, variations greater than 10 percent in weight, and (2) for batch waste, any variation in piece count, such as a discrepancy of one drum in a truckload. This discrepancy report should consist of a letter to the Appropriate EPA Regional Administrator describing the discrepancy, the attempts to reconcile it, and a copy of the manifest form.

C. Manifest Exception Report

A generator who does not obtain a signed copy of the manifest form from the designated storage, treatment, or disposal facility must submit an exception report to the appropriate EPA Regional Administrator within 45 days of the date the waste was shipped. This report should contain the following information: (1) a legible copy of the manifest form for which the generator does not have confirmation of delivery, and (2) a cover letter explaining the efforts made to locate the Hazardous Waste and the results of those efforts.

D. Individual Exception Reports

Individual exception reports must be prepared and submitted to the appropriate EPA Regional Administrator for Emergency incidents, including Hazardous Waste spills, releases, fires, and explosions as referenced under the Contingency Plan and Emergency Procedures (see HW-ASD 8.1).

III. AVAILABILITY, RETENTION, AND DISPOSITION OF RECORDS

A. Records and reports, including Hazardous Waste operating plans, must be made available to authorized EPA representatives. When possible, obtain a written request for records from a governmental authority. Such written requests should include the reason and authority for making the request. Notify the ASD Manufacturing Environmental Specialist or the Legal Operation prior to responding to such requests.

B. Upon closure of a facility, copies of waste disposal records must be submitted to the EPA Regional Administrator and local land authority.

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EXHIBIT 1 - HW-ASD-11.1

HAZARDOUS WASTE MANAGEMENT OPERATING RECORD

_____ SERVICE SHOP SHOP EPA I.D. NO. _____

Accum. Start Date	Container No.	Container Type	Location	Hazardous Waste Description	EPA I.D. No.	Quantity Lbs.	Wastes Shipped Date	Wastes Shipped Manifest No. / Disposer I.D.

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ADDENDUM D

D. PROCESS INFORMATION

1. SEE ATTACHED AND PROPOSED EXPANSION SECTION OF ORIGINAL 373 APPLICATION

2. SEE DRAWING SECTION ADDENDUM

3. SEE ATTACHED

4. SEE DRAWING SECTION ADDENDUM

5. SEE DRAWING SECTION ADDENDUM

6. THRU 8. SEE ATTACHED

9. THRU 16. SEE PROPOSED EXPANSION SECTION AND DRAWING SECTION ADDENDUM.

PROCESS INFORMATION

I. CONTAINER STORAGE

A. Hazardous Wastes must be stored in labeled containers that are compatible with the wastes and are in good condition.

B. Hazardous Waste containers must remain closed except during addition or removal of waste.

C. Containers must be inspected weekly. Any signs of leakage or spillage will be corrected as soon as noticed. Corrective measures will be implemented as per Buffalo Service Shop Spill Prevention Control and countermeasures plan.

II. HAZARDOUS WASTE SORTING, SEGREGATION, AND STORAGE

A. Container Disposal

If the following requirements are met, the containers listed below can be disposed of as general trash.

1. Hazardous Material Containers
   Containers that have held hazardous materials (except for acute Hazardous Wastes identified by P numbers) must be inspected to insure that there is less than one inch of material remaining in the bottom of the container. If the residual hazardous material exceeds one inch, then the container must be classified as Hazardous Waste.

2. Aerosol Containers
   Aerosol containers that contain hazardous materials must be inspected to insure there is no pressure remaining in the container. If there is residual pressure, then the aerosol container must be classified as Hazardous Waste.

3. Solvent and Thinner Drums
   Solvent and thinner drums must be inspected to insure that they have been thoroughly drained.

4. Steam Cleaning Material Drums
   Drums that contained either liquid or powder alkaline or caustic cleaning materials must be thoroughly rinsed with water to insure that no material remains in the drum. If the drum contains a liner, then the liner should be thoroughly rinsed.

B. Storage Containers

With the exception of acids, DOT Specification 17E (bung opening) and 17H (removable head)drums should be used to store Hazardous Wastes. Acids should be stored in their original containers. A plastic liner should be placed inside drums that will contain corrosive materials. Below is a list of typical Hazardous Wastes generated in service shops that will require storage drums. PCB liquid wastes will be stored in DOT 5, 5B, 6D overpacks with liner 2S or 2SL or DOT 17C containers. Solid PCB waste will be stored in DOT Spec 5, 5B, or 17C containers.

III. CONTAINER SHIPPING AND LABELING

See attached exhibit I - HW - ASD - 6.1 for container type and labeling information.

EXHIBIT I - HW-ASD-6.1

SERVICE SHOP HAZARDOUS WASTES

SERVICE SHOP HAZARDOUS WASTE	EPA HAZARD NO.	PROPER DOT SHIPPING NAME	DOT UN OR NA NO.	DOT LABEL	DOT HAZARD CODE	PACKAGING DRUM TYPE	PLACARD
Used Rags	D001	Waste Rags, Oily	UN1856	Flammable Solid	08	6A,6B,6C,17C 17E,17H,37A,37B 12B,21C	Flammable Solid
Solvents & Thinners							
Acetone	F003	Waste Acetone	UN1090	Flammable Liquid	07	5,5A,5B,5C,5M 17E,17C	Flammable
Cellosolve	D001	Waste Ethylene Glycol Monoethyl Ether	UN1171	Combustible Liquid	01	None	Combustible
Chlorothene NU	U226 F001	Waste 1,1,1-Trichloroethane	UN2831	ORM-E	12	None Specified	None
Chlorothene VG	U226 F001	Waste 1,1,1-Trichloroethane	UN2831	ORM-E	12	None Specified	None
Denatured Alcohol	D001	Waste Denatured Alcohol	NA1986	Flammable Liquid	07	5,5A,5B,5C,5M 17E,17C	Flammable
Ethyl Alcohol	D001	Waste Ethyl Alcohol	UN1170	Flammable	07	5,5A,5B,5C,5M 17E,17C	Flammable
Kerosene	D001	Waste Kerosene	UN1223	ORM-E	12	None Specified	Combustible
Methyl-Ethyl-Ketone (MEK)	U159 F005	Waste Methyl-Ethyl-Ketone	UN1193	Flammable Liquid	07	5,5A,5B,5C,5M 17E,17C	Flammable
Methylene Chloride	U080 F001	Waste Methylene Chloride	UN1593	ORM-E	12	None Specified	None

EXHIBIT I - HW-ASD-6.1

SERVICE SHOP HAZARDOUS WASTES

SERVICE SHOP HAZARDOUS WASTE	EPA HAZARD NO.	PROPER DOT SHIPPING NAME	DOT UN OR NA NO.	DOT LABEL	DOT HAZARD CODE	PACKAGING DRUM TYPE	PLACARD
Naptha (VM&P)	D001	Waste Naptha	UN2553	Flammable Liquid	07	5,5A,5B,5C,5M	Flammable
Naptha (Hi-Flash)	F003 F005	Waste Naptha	UN2553	ORM-E	12	None Specified	Combustible
Perclene Perk Perchlor Perchloroethylene	U210 F001	Waste Perchloroethylene	UN1897	ORM-E	12	None Specified	None
Safety Cleaner 150	U226 F001	Waste 1,1,1-Trichloroethane	UN2831	ORM-E	12	None Specified	None
Toluol/Toluene	U220 F005	Waste Toluene	UN1294	Flammable Liquid	07	5,5A,5B,5C,5M 17E,17C	Flammable
Trichloroethane III Triethane III 1,1,1-Trichloroethane	U226 F001	Waste 1,1,1-Trichloroethane	UN2831	ORM-E	12	None Specified	None
1,1,2-Trichloroethane	U227	Waste 1,1,2-Trichloroethane	None	ORM-E	12	None Specified	None
Trichloroethylene	D001	Waste Trichloroethylene	UN1710	ORM-E	12	None Specified	None
Varsol	D001	Waste Naptha	UN2553	Flammable Liquid	07	5,5A,5B,5C,5M 17E,17C	Flammable
Xylene, Xylol	U239 F003	Waste Xylene	UN1307	Flammable Liquid	07	5,5A,5B,5C,5M 17E,17C	Flammable

EXHIBIT I - HW-ASD-6.1

SERVICE SHOP HAZARDOUS WASTES

SERVICE SHOP HAZARDOUS WASTE	EPA HAZARD NO.	PROPER DOT SHIPPING NAME	DOT UN OR NA NO.	DOT LABEL	DOT HAZARD CODE	PACKAGING DRUM TYPE	PLACARD
SE75	F001	Hazardous Waste, Liquid N.O.S.	NA9189	ORM-E	12	None Specified	None
676	F001	Hazardous Waste, Liquid N.O.S.	NA9189	ORM-E	12	None Specified	None
AP755	F001	Hazardous Waste, Liquid N.O.S.	NA9189	ORM-E	12	None Specified	None
Solute 2101	F001	Hazardous Waste, Liquid N.O.S.	NA9189	ORM-E	12	None Specified	None
1500 Thinner 1511 F Thinner 1511 M Thinner 1514 Lacquer Thinner 6442 Thinner 9424 Thinner 75029 Thinner	D001	Waste Flammable Liquid NOS	UN1993	Flammable Liquid	07	5,5A,5B,5C,5M 17E,17C	Flammable
All Paints and Enamels	D001	Waste Paint,	UN1263	Flammable Liquid	07	5,5A,5B,5C,5M 17E,17C	Flammable
Paint Residue (Solidified)	D002	Hazardous Waste, Solid N.O.S.	NA9189	ORM-E	12	Same	Same
Adhesives & Epoxies 1276 Adhesive 1286 Adhesive 7057 Adhesive 880 Gasket Adhesive Pliobond	D001	Waste Adhesive	NA1133	Flammable Liquid	07	5A,5B,5C,5M,5 17E,17C	Flammable

EXHIBIT I - HW-ASD-6.1

SERVICE SHOP HAZARDOUS WASTES

SERVICE SHOP HAZARDOUS WASTE	EPA HAZARD NO.	PROPER DOT SHIPPING NAME	DOT UN OR NA NO.	DOT LABEL	DOT HAZARD CODE	PACKAGING DRUM TYPE	PLACARD
Adhesives & Epoxies							
3060 Casting Epoxy 3093 Sprayable Epoxy 5003 Epoxy Cement	D002	Waste Corrosive Liquid, N.O.S.	UN1760	Corrosive	02	37P	Corrosive
Fluxes							
115-5-51 Soldering Flux 294 Soldering Flux Stainless Steel Soldering Flux X-25 Soldering Flux	D001	Waste Combustible Liquid Liquid, N.O.S.	UN1993	Combustible Liquid	07	5,5A,5B,5C,5M, 17E,17C	Combustible
Acids							
Hydrochloric Acid	D002	Waste Hydrochloric Acid	UN1789	Corrosive	02	Use Original Container	Corrosive
Phosphoric Acid	D002	Waste Phosphoric Acid	UN1805	Corrosive	02	Use Original Container	Corrosive
Nitric Acid	D002	Waste Nitric Acid	NA1796	Corrosive	02	Use Original Container	Corrosive
Sulfuric Acid	D002	Waste Sulfuric Acid	UN1830	Corrosive	02	Use Original Container	Corrosive
Caustic Cleaners							
92XX Magnus Cleaner	D002	Waste Corrosive Liquid, NOS	UN1760	Corrosive	02	Use Original Container, 17E, 17H	Corrosive
215D Magnus Cleaner	D002	Waste Corrosive Liquid, NOS	UN1760	Corrosive	02	Use Original Container, 17E, 17H	Corrosive

EXHIBIT I - HW-ASD-6.1

SERVICE SHOP HAZARDOUS WASTES

SERVICE SHOP HAZARDOUS WASTE	EPA HAZARD NO.	PROPER DOT SHIPPING NAME	DOT UN OR NA NO.	DOT LABEL	DOT HAZARD CODE	PACKAGING DRUM TYPE	PLACARD
Alkaline Cleaners 114 Magnus Cleaner 147X Magnus Cleaner 92S Magnus Cleaner 26N Magnus Cleaner	D002	Waste Alkaline Liquid, N.O.S.	NA1719	Corrosive	02	Use Original Container,17E, 17H	Corrosive
NDT Materials SKC-NF Cleaner/Remover ZP-9 Zyglo Form B Developer ZC-7 Zyglo Form B Cleaner/Remover	F002	Hazardous Waste Liquid, NOS	NA9189	ORM-E	12	None Specified	None
14AM Magna Glo Prepared Bath	D001	Waste Flammable Liquid	UN1993	Flammable Liquid	07	5,5A,5B,5C,5M 17E,17C	Flammable
Flame Spray Wet Sludge	D007	Hazardous Waste, Solid, N.O.S.	UN9189	ORM-E	12	None Specified	None
Miscellaneous							
Insulation-Transformer Leads (Clear & Dark)	D001	Hazardous Waste Liquid, NOS	UN1993	Flammable Liquid	07	5,5A,5B,5C,5M	Flammable
SS-3 Stainless Steel Cleaner	D002	Waste Corrosive Liquid, Cleaning Compound	UN1760	Corrosive	02	37P,17H,17C,21P 37A,17E,34,37B, 17F	Corrosive
3068 Texo-Brite (Chromic Acid Solution)	D002	Waste Chromic Acid Solution	UN1755	Corrosive	02	Do Not Mix 17E Check Regulations	Corrosive

EXHIBIT I - HW-ASD-6.1

SERVICE SHOP HAZARDOUS WASTES

SERVICE SHOP HAZARDOUS WASTE	EPA HAZARD NO.	PROPER DOT SHIPPING NAME	DOT UN OR NA NO.	DOT LABEL	DOT HAZARD CODE	PACKAGING DRUM TYPE	PLACARD
Ferric Chloride (Powder)	D002	Waste Ferric Chloride Solid	UN1773	ORM-E	12	Use Original Container	None
Cupric Sulfate (Powder)	D002	Waste Cupric Sulphate	NA9109	ORM-E	12	Use Original Container	None
PM6297 Rust Ban EG6565 Rust Ban	D001	Waste Paint	UN1263	Flammable Liquid	07	5,5A,5B,5C,5M 17E,17C	Flammable
Formex Gel	D002	Waste Formic Acid	NA1779	Corrosive	02	37P,17H,17C,21P, 37A,17E,34, 37B, 17F	Corrosive
#2 Form-A-Gasket Cement	D001	Waste Cement, Liquid, N.O.S.	NA1133	Flammable Liquid	07	5,5A,5B,5C,5M, 17E,17C	Flammable
65382 Battery Cleaner 65376 Silicone Lube 65379 White Grease 69954 Open Gear Lube	D001	Waste Flammable Liquid, NOS	UN1993	Flammable Liquid	07	5,5A,5B,5C,5M 17E,17C	Flammable
Butyl Alcohol	U031	Waste Butyl Alcohol	NA1120	Flammable Liquid	07	5,5A,5B,5C,5M 17E,17C	Flammable
Aqua Ammonia 26	D002	Waste Corrosive Liquid, NOS (Ammonia Compound)	UN1760	Corrosive	02	Use Original Container	Corrosive
Rapid Fixer Solution A Rapid Fixer Solution B Rust-I-Cide Klean Crete	D002	Waste Corrosive Liquid, N.O.S.	UN1760	Corrosive	02	Use Original Container	Corrosive

EXHIBIT I - HW-ASD-6.1

SERVICE SHOP HAZARDOUS WASTES

SERVICE SHOP HAZARDOUS WASTE	EPA HAZARD NO.	PROPER DOT SHIPPING NAME	DOT UN OR NA NO.	DOT LABEL	DOT HAZARD CODE	PACKAGING DRUM TYPE	PLACARD
Ammonium Hydroxide	D002	Waste Ammonium Hydroxide	NA2672	Corrosive	02	5,5A,5B,5C,5M 50,5H,17C,17E 17F,37P	Corrosive
2-Butanone Peroxide	P019	Hazardous Waste, Liquid or Solid, N.O.S.	NA9189	ORM-E	12	17C,17E,17H	None Specified
Cyanides	P030	Waste Cyanide Solution	UN1935	Poison	15	5,5A,5B,17E, 37B	Poison
2-Cyclohexy-4,6-Dinitrophenol	P034	Hazardous Waste, Liquid or Solid, N.O.S.	NA9189	ORM-E	12	17C,17E,17H	None Specified
2,4-Dichlorophenoxyacetic Acid	P035	Waste 2,4-Dichlorophenoxy-acetic Acid	NA2765	ORM-E	12	17C,17E,17H	None Specified
O,O-Diethyl-O-(2-Pyrazinyl) Phosphorothionate	P040	Hazardous Waste, Liquid or Solid, N.O.S.	NA9189	ORM-E	12	17C,17H,17E	None Specified
4,6-Dinitro-O-Cresol and Salts	P047	Hazardous Waste, Liquid or Solid, N.O.S.	NA9189	ORM-E	12	17C,17H,17E	None Specified
2,4-Dithiobiuret	P049	Hazardous Waste, Liquid or Solid, N.O.S.	NA9189	ORM-E	12	17C,17H,17E	None Specified
Methyl Parathion	P071	Waste Methyl Parathion	NA2783	Poison	15	5,5A,5B,17C 17E	Poison
Phenyl Dichloroarsine	P091	Waste Phenyl Dichloroarsine	NA1556	Poison	15	5A 30 Gallon Limit	Poison
Phenyl Mercaptan	P091	Waste Phenyl Dichloroarsine	NA1556	Poison	15	5A 30 Gallon Limit	Poison

EXHIBIT I - HW-ASD-6.1

SERVICE SHOP HAZARDOUS WASTES

SERVICE SHOP HAZARDOUS WASTE	EPA HAZARD NO.	PROPER DOT SHIPPING NAME	DOT UN OR NA NO.	DOT LABEL	DOT HAZARD CODE	PACKAGING DRUM TYPE	PLACARD
Potassium Cyanide	P098	Waste Potassium Cyanide Solution or Solid	UN1680	Poison	15	5,5A,5B, 17E Liquid 17H Solid	Poison
2-Propyn-1-ol	P102	Hazardous Waste, Liquid or Solid, N.O.S.	NA9189	ORM-E	12	17C,17H 17E	None
Silver Cyanide	P104	Waste Silver Cyanide	UN1684	Poison	15	5,5A,5B 17E (Liquid) 17H (Solid)	Poison
Strontium Sulfide	P107	Hazardous Waste, Liquid or Solid, N.O.S.	NA9189	ORM-E	2	17C,17H,17E	None
Sodium Cyanide	P106	Waste Sodium Cyanide	RQ 10/4.54 UN1689	Poison	15	5,5A,5B, 17E (Liquid) 17H (Solid)	Poison
Vanadium Pentoxide	P120	Waste Vanadium Pentoxide	RQ 1000/454 UN2862	ORM-E	12	17C,17H,17E	None
2861 Permafil 3332 Permafil Catalyst 9858 Catalyst X-25 Soldering Flux	D001	Waste Oxidizing Material N.O.S.	UN1479	Oxidizer	13	6,6A,6B,6C, 17C,17E,17H 37A,37B	Oxidizer

ADDENDUM F

ADDENDUM F

F. PROCEDURES TO PREVENT HAZARDS

1. SECURITY - ATTACHED

2. THRU 6. - ATTACHED

7. THRU 9. - SEE CONTINGENCY PLAN AND EMERGENCY PROCEDURES SECTION OF ORIGINAL 373 APPLICATION.

SECURITY

In order to prevent spills that would result from accident or vandalism on the Shop site, the following measures are taken:

a. The master flow and drain valves and any other valves that will permit direct outward flow of a tank's contents to the surface are securely locked in the closed position when in non-operating status.

b. The starter control on all oil/PCB pumps is locked in the "OFF" position or located at a site accessible only to authorized personnel when the pumps are in a non-operating status.

c. The loading-unloading connections of oil/PCB pipelines is securely capped or blank-flanged when not in service or on standby service for an extended time.

d. The Facility is fully fenced. Entrance gates are locked when the facility is closed.

e. Facility lighting is commensurate with the type and location of the facility. Lighting is of sufficient capacity to ensure adequate security and safe operations, considering discovery of spills occurring during hours of darkness and prevention of spills occurring through acts of vandalism.

HAZARDOUS WASTE INSPECTION PLAN

This inspection plan applies to existing storage and proposed expansion of existing storage. Inspections will be performed based on a schedule which will utilize forms 1, 2, and 3 of Appendix A in inspection section and inspection procedures outlined in SPCC Plan found in our original Part 373 permit application.

I. INSPECTION SCHEDULE

A. Daily Inspections

1. Loading and unloading areas

B. Weekly Inspections

1. Above ground storage tanks
2. Container storage
3. Spill control and emergency response equipment.
4. Facility transfer operations.

C. Annual Inspections

1. Above ground storage tanks
2. Temporary storage containers

D. Other Inspections (every 5 years)

1. Above ground storage tanks

HAZARDOUS WASTE INSPECTION PLAN

II. INSPECTION PROCEDURES

A. Daily Inspections

1. Loading and unloading areas will be inspected daily when in use. Areas used for loading or unloading will be inspected for signs of any leaks or spills during and after loading or unloading. If necessary, an inspection of driveway leading to loading or unloading area will also be inspected.

B. Weekly Inspections.

1. Above ground storage tanks will be visually inspected for leaks or signs of deterioration which might cause a spill. Inspection will include condition of tank, and check of all foundations, supports, and curbing for cracks, leaks, chipping, flaking, and any other signs of wear.

2. Container in storage will be checked for evidence of leaks and deterioration. Inspector will check for correct use and labeling of containers. Container covers and bungs will be checked for tightness. Storage areas to be checked for sufficient aisle spacing to permit inspection and room to perform any remedial work necessary. Inspector will verify that incompatible wastes, if in storage, are kept segregated. Concrete pads and curbing will be inspected for cracks, chips, and flaking. Covered storage areas will be checked for roof/wall leaks and signs of deterioration.

3. Spill control kits will be checked for completeness and availability in storage areas. Emergency response equipment consisting of emergency lighting, portable fire extinguishers and public address system will be checked for proper operation. Inspector will verify the availability and condition of all personal safety equipment including rubber gloves, boots, coveralls, face shields, and respirators.

4. All areas of oil/PCB and hazardous waste transfer will be checked. Areas will include but not be limited to tank fill points, transformer fill points, and waste oil/PCB draining areas. The inspection will be made to insure the integrity of all above ground valves, pipelines, flange points, drip pans, and pipe supports. Curbing and floors will be checked for cracks, chipping, and flaking.

C. Annual Inspections

1. Above ground storage tanks will be thoroughly inspected. A detailed inspection will include an examination of the entire tank for rust or other physical deterioration, leakage and/or accumulation of oil within diked areas, settlement, cracking, and/or general deterioration of the diked area foundation and curbing.

2. Temporary storage containers will be thoroughly inspected yearly. A detailed inspection will include an examination of the entire container for signs of corrosion, paint loss, leaking, and proper labeling.

D. Other Inspections

1. At least once every five (5) years, above ground storage tanks will be checked for leakage by using low pressure air testing. Record of all inspections shall be kept on file at facility. Records of weekly and yearly inspections will be kept on file for a minimum of three (3) years.

III. REMEDIAL ACTIONS

Any deficiencies found during inspections will be corrected as soon as they are found. Corrective measures will include repair or replacement of any tanks, containers, piping or curbing as required.
Leads or spills will be handled per SPCC Plan Procedures found in Section 6 of SPCC Plan located in Spill Prevention Section of original Part 373 application.

IV. INSPECTION PERSONNEL:

PCB storage and work areas

Inspector	-	A. Hejmanowski
Alternative	-	W. Lukas

RCRA waste collection and storage areas

Inspector	-	H. Haase
Alternate	-	J. Domske

Spill control and emergency response equipment

Inspector	-	H. Haase
Alternate	-	J. Domske

ADDENDUM G

ADDENDUM G

G. CONTINGENCY PLAN

1. THRU 5. - SEE SPILL PREVENTION PLAN SECTION OF ORIGINAL 373 APPLICATION

6. SEE SERVICE SHOP EMERGENCY PROCEDURES ATTACHED.

SERVICE SHOP EMERGENCY PROCEDURES

A. Emergency Control

1. In the event of an emergency, where it is feasible to remain on the premises without unduly endangering plant personnel, the following procedure will be followed:

   a. An Emergency Control Center will be established at the Electrical Foreman Office.

   b. The Emergency Coordinator will report immediately to the Emergency Control Center.

   c. The Shop Emergency Team will report immediately to the Emergency Control Center.

   d. Maintenance and engineering personnel will report immediately to the Emergency Control Center.

2. In the event of an emergency where it is necessary to evacuate the shop building, the following procedure will be followed:

   a. An alternate Emergency Control Area will be established at the Main Gate.

   b. The Emergency Coordinator will report immediately to the alternative Emergency Control Area where he will designate individuals to contact the fire department, police department, and ambulance services required.

   c. Each foreman and supervisor will be responsible for ensuring that all personnel have vacated their area of responsibility. Then they will report to the Emergency Coordinator at the Emergency Control Area.

   d. The Shop Emergency Team will report immediately to the Emergency Control Area.

   e. Maintenance and engineering personnel will report immediately to the Emergency Control Area.

B. Fire

1. The foreman whose area requires fire department assistance will perform the following activities:

   a. Activate internal alarms.

   b. Call the fire department.

   c. Assign a person to the shop entrance to direct the firemen to the scene of the emergency.

   d. Assign fire-fighting personnel to fight the fire with the use of fire extinguishers and/or fire hoses. Caution should be used not to over commit shop fire-fighting activities to the extent that shop personnel are endangered. If in doubt, evacuate the area and wait for the fire department.

   e. Notify the Emergency Coordinator of the Emergency.

2. The Emergency Coordinator will perform the following activities:

   a. Notify the Shop Emergency Team and take charge of shop fire-fighting activities.

   b. Notify the fire department, police department, ambulance services, and emergency response teams as required.

   c. Assign personnel to isolate electrical power and shop gas and fuel supplies as required.

   d. Assign personnel to move material away from the path of fire or from possible water damage.

   e. Evacuate personnel from areas of potential danger.

   f. After the fire, direct and assign people to secure the area and perform clean-up activities.

C. Civil Disturbance

In the event of a civil disturbance, the Emergency Coordinator will direct the following activities:

1. Ensure that all personnel have vacated areas with external doors or windows.

2. Close and lock all gates providing access to the shop property.

3. Move as much company/customer equipment as practical inside the building.

4. Close and lock all exterior building doors and windows.

5. Activate all exterior alarm systems.

6. Alert shop personnel that an emergency condition exists and that emergency procedures are to be immediately followed.

7. Notify the police department.

D. Bomb Threat

In the event that a bomb threat is received, the following action will be taken:

1. The person receiving the threat will attempt to obtain as much information as possible in accordance with the guidelines detailed in Employee Relations Information letter ERIL 68-19D.

2. The person receiving the threat will immediately notify the shop manager or acting manager.

3. The shop manager or acting manager will notify the police department and in accordance with emergency procedures.

E. Evacuation of Premises

In the event that evacuation of the building becomes necessary, the Emergency Coordinator will direct any of the following activities judged by the nature of the emergency.

1. Nofity the police department of evacuation activity and obtain their assistance in providing the safest route for evacuation from the general area.

2. Activate external alarm systems.

3. Assign personnel to direct traffic to leave Company property in an orderly coordinated manner.

4. Utilize all available shop vehicles and personal cars to provide all personnel with transportation away from Company property.

5. Remove all essential records from the building.

6. Shut down building activities that will not be required.

7. If caretaker activities are required, select at least two volunteers to remain as plant caretakers.

8. Close and lock all perimeter fence gates.

9. Close and lock all exterior doors and windows.

10. Notify the police department of the condition of the premises.

11. Notify the fire department of the condition of the premises.

12. In the event that access to the shop is not available, predetermine a satellite Emergency Control Center.

F. Service Shop Emergency Response Teams

(Requires annual review and revision).

The following individuals are assigned to the shop's Emergency Response Team. These individuals are familiar with the shop's Emergency Procedures and have received training in the use of shop fire-fighting equipmewnt and/or Hazardous Waste spill containment and clean up. Designated individuals are familiar with the shop's utilities and with the proper procedures for shop power isolation and the shutdown of fuel supplies.

Walter Lukas - Emergency Coordinator

Richard W. Conway - Shop Manager

Tony Hejmanowski - PCB Specialist - Alternate Emerg. Coordinator

Henry Haase - Shop Maintenance - Area Operator

Kenneth Berger - Transformer Repair A - Area Operator

Prepared by Walter Lukas
Emergency Coordinator

HAZARDOUS WASTE MANAGEMENT

PERSONNEL

The following Shop personnel are presently assigned duties/responsibilities for proper handling and control of hazardous materials:

HAZARDOUS MATERIAL IDENTIFICATION

Designee	Anthony Hejmanowski	Purchasing
Alternate	Paul Collin	Stockroom Keeper

SHOP HAZARDOUS WASTE CONTROL

Designee	Henry Haase	Transformer B
Alternates	Paul Collin Anthony Hejmanowski	Stockrook Keeper Purchasing

EMERGENCY ACTIVITIES

Emergency Coordinator	Walter Lukas	Electrical Foreman
Shop Manager	Richard Conway	Manager
Alternate Coordinator	Anthony Hejmanowski	Purchasing
Area Foreman	Robert Eisenberger	Foreman
Area Operator	Henry Haase	Transformer B
Area Operator	Kenneth Berger	Transformer B

TRAINING

Designee	Anthony Hejmanowski	Purchasing
Alternate	Walter Lukas	Emergency Coordinator

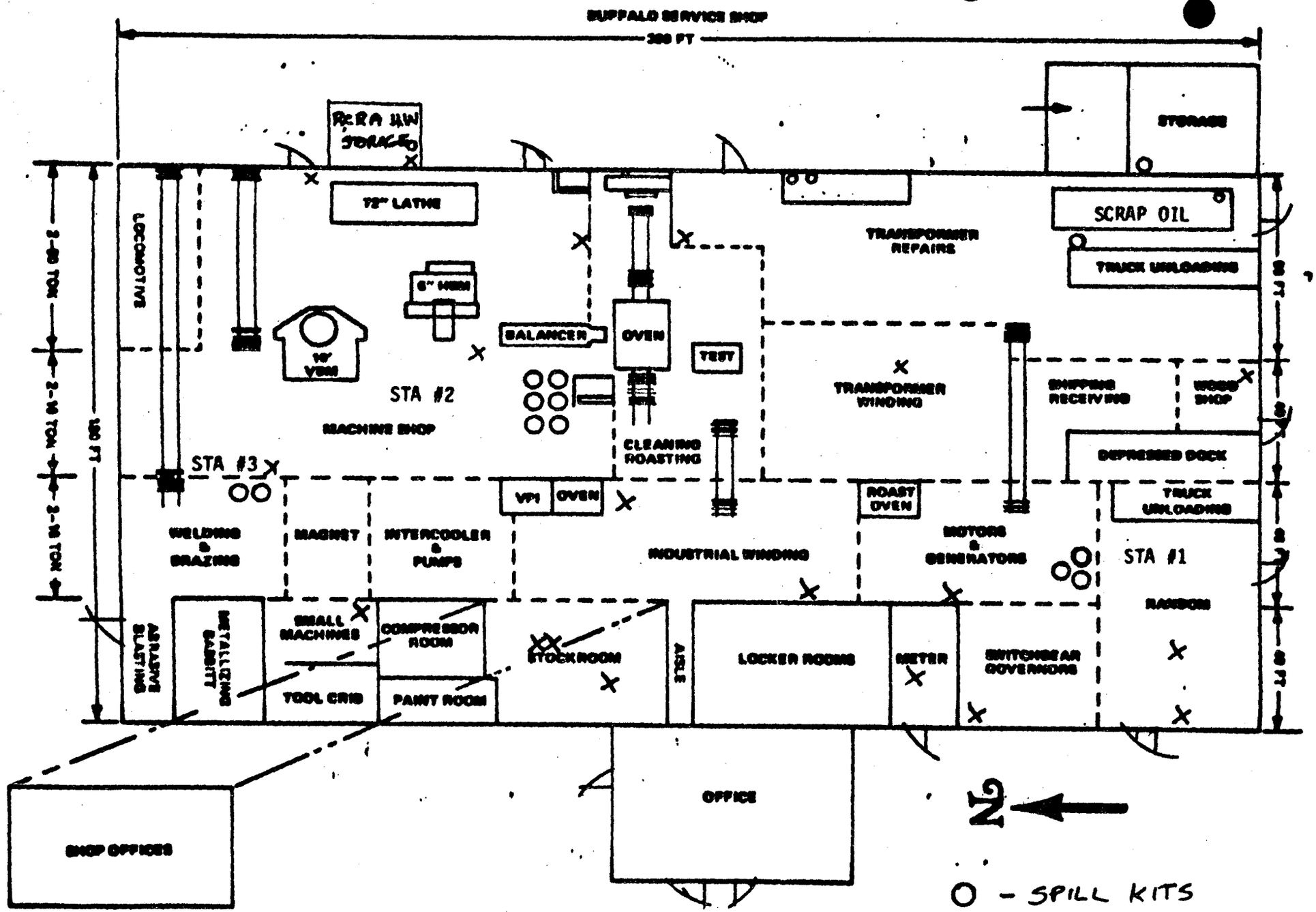
INSPECTION

Designee	Anthony Hejmanowski	Purchasing
Alternate	Walter Lukas	Electrical Foreman
Designee	Henry Haase	Transformer B
Alternate	James Domske	Transformer A

RECORD KEEPING

Designee	Anthony Hejmanowski	Purchasing

HAZARDOUS WASTE [illegible]ECTION AND STORAGE



ADDENDUM H.

H. PERSONNEL TRAINING

1. THRU 4. - SEE ATTACHED PERSONNEL TRAINING PLAN

PERSONNEL TRAINING PLAN

I. TRAINING REQUIREMENTS:

A. Annual classroom training will be conducted for all shop personnel. This training will include hazardous waste identification, waste collection, storage, transportation, treatment and disposal. The training program is designed to insure that shop personnel are familiar with procedures and equipment so that they can effectively respond to emergencies.

B. Shop personnel involved with PCB servicing activities must attend additional training sessions on "PCB Servicing Procedures and Controls". Personnel attending these sessions and passing quizzes upon completion of session become certified PCB supervisors. Any shop or onsite work that requires handling of any transformer insulating liquid must be done by or under the direct supervision of a certified PCB Supervisor. No shop employee will be allowed to perform any shop PCB work unless he/she is a certified PCB Supervisor or is working under supervision of a PCB Certified Supervisor.

C. Meetings will be held between the Shop Manager or designated employee in charge of spill prevention and control, and other employees at the General Electric Company. At regular intervals frequent enough to assure an adequate understanding of the SPCC Plan, but at intervals not to exceed one year. The date of these meetings will be recorded. The agenda at these meetings should include:

- A briefing of recently developed precautionary or response measures.
- A brief review of the proper operating procedures for PCB Liquid Waste storage. The nature of materials being handled and potential health hazards. Capabilities of storage tanks. Location and operation of all safety equipment, and spill response material. Spill response procedures outined in SPCC Plan.

PERSONNEL TRAINING PLAN

II. TRAINING REVIEW

All service shop personnel must take part in an annual review of the initial hazardous waste training.

New personnel must be instructed in hazardous waste control and emergency procedures as they are hired.

PCB supervisors will be re-certified on a yearly basis.

III. HAZARDOUS WASTE MANAGEMENT RESPONSIBILITY

A. Richard Conway and Anthony Hejmanowski, are responsible for the administration of Hazardous Waste Management at the Buffalo Service Shop. These duties include the establishment and maintenance of procedures as defined in the ASD Hazardous Waste Management Manual and the Regulations of the State of New York for the following waste activities.

Material Analysis
Facility Requirements
Shop Floor Control
Inspection
Manifests
Contingency and Emergency
Training

B. Anthony Hejmanowski and Paul Collin are responsible for the identification of stock materials which will require Hazardour Waste Control when discarded.

C. Henry Haase and Anthony Hejmanowski are responsible for compliance with shop floor procedures for the accumulation and segregation of Hazardous Waste.

D. Henry Haase and Paul Collin are responsible for the collection and proper storage of hazardous wastes.

PERSONNEL TRAINING PLAN

E. Anthony Hejmanowski and Walter Lukas are responsible for the preparation of hazardous waste shipping manifests.

F. Walter Lukas is designated as the emergency coordinator with the authority and responsibility for the implementation of contingency and emergency procedures.

The above individuals are familiar with the Hazardous Waste requirements as defined in the ASD Hazardous Waste Management Manual and in the Buffalo Service Shop procedures.

The shop employees have received training on hazardous waste regulations and on the Buffalo Service Shop's Hazardous Waste Management. Procedures Training is conducted by Anthony Hejmanowski, Walter Lukas and other management designees at in-shop employee training sessions. Records of these training sessions are maintained in the hazardous waste training file.

PERSONNEL TRAINING PLAN

IV. HAZARDOUS WASTE MANAGEMENT PERSONNEL

The following shop personnel are presently assigned duties/responsibilities for proper handling and control of hazardous materials:

HAZARDOUS MATERIAL IDENTIFICATION

Designee	Anthony Hejmanowski	Purchasing
Alternate	Paul Collin	Stockroom Keeper

SHOP HAZARDOUS WASTE CONTROL

Designee	Henry Haase	Transformer B
Alternates	Paul Collin Anthony Hejmanowski	Stockrook Keeper Purchasing

EMERGENCY ACTIVITIES

Emergency Coordinator	Walter Lukas	Electrical Foreman
Shop Manager	Richard Conway	Manager
Alternate Coordinator	Anthony Hejmanowski	Purchasing
Area Foreman	Robert Lutz	Foreman
Area Operator	Henry Haase	Transformer B
Area Operator	Kenneth Berger	Transformer B

TRAINING

Designee	Anthony Hejmanowski	Purchasing
Alternate	Walter Lukas	Emergency Coordinator

INSPECTION

Designee	Anthony Hejmanowski	Purchasing
Alternate	Walter Lukas	Electrical Foreman
Designee	Henry Haase	Transformer B
Alternate	James Domske	Transformer A

RECORD KEEPING

Designee	Anthony Hejmanowski	Purchasing

PERSONNEL TRAINING PLAN

V. HAZARDOUS WASTE MANAGEMENT JOB DESCRIPTION

HAZARDOUS MATERIAL IDENTIFICATION

Perform review of stock materials believed to be hazardous

Review purchase of new material.

HAZARDOUS WASTE CONTROL

Properly distribute, collect and have analyzed wastes identified as hazardous.

EMERGENCY ACTIVITIES

Emergency Coordinator and Alternates will be thoroughly familiar with contingency and emergency procedures plans. All duties as defined in plans will be performed by designated personnel.

TRAINING

Designated employees will be responsible for all aspects of training as specified in Shop Training Plan.

INSPECTION

Designated employees will be familiar with inspection plan. Employees will be responsible to perform inspection duties as outlined in plan.

RECORD KEEPING

Designated employees will be repsonsible for all files and reports required by federal, state, local and department regulations.

ADDENDUM I

I. CLOSURE PLAN

1. THRU 9. SEE REVISED CLOSURE PLAN ATTACHED.

CLOSURE PLAN

This plan covers closure plans and costs of existing and proposed storage areas.

Name and Address: General Electric Company
175 Milens Road
Tonawanda, N.Y. 14150

EPA ID NO. NYD 067539940

Hazardous Waste Permit No:

Type of Facility: Storage

Facility Description:

1. This Facility contains a fenced-in, curbed, roofed area capable of storing the following type of Hazardous Wastes in drums:

Flammable Liquids and Solids
Corrosive Liquids and Solids
Acids
Oxidizers
Spent Solvents
EP Toxic Materials

2. There are two (2) interior curbed storge areas capable of storing the following wastes.

Polychlorinated Biphenyls Liquids and Solids.

3. Proposed waste storage will include two (2) above ground storage tanks each containing 5000 gallons and one (1) above ground tank containing 3000 gallons of the follwoing waste:

Polychlorinated Biphenyl Liquid

(1) 5000 Gal. tank with PCB Liquid greater than 25000 PPM PCB
(1) 5000 Gal. tank with PCB Lliquid less than 25000 PPM PCB
(1) 3000 Gal. tank with contaminated flush liquid

CLOSURE PLAN

1. All drums of hazardous wastes will be removed from the storage areas and shipped to the appropriate treatment or disposal facility.

2. All PCB articles in storage will be contaminated by draining and flushing, articles will be removed to a secure chemical landfill. All drained and rinse materials will be removed to qualified incinerator.

3. All PCB tanks will be triple rinsed. Each rinse will be 10 percent of total tank volume. Each rinse will be tested to insure that it contains less than 50 PPM PCB concentration. All rinse materials will be removed to qualified incinerator.

4. All hazardous waste residues will be absorbed with absorbent material and placed in drums for disposal. The storage areas will be scrubbed down, rinsed and rinsings absorbed with absorbent material for disposal in drums.

CLOSURE COSTS:

1. RCRA Hazardous Waste Storage Testing and Waste Characterization 36 drums X $100/drum	$3600.00
Removal and Disposal of Waste 36 drums x $125/drum	$4500.00
Decontaminate storage area Labor 2 men x 8 hrs. x $12/hr.	192.00
Supervisor 1 man x 8 hrs. x $28/hr	224.00
Cleaning Material - absorbent	50.00
Residue Testing 2 drums x $100	200.00
Residue Disposal 2 drums x $125	250.00

CLOSURE PLAN

CLOSURE COSTS:

2. PCB Waste Storage (Drums)

Drum Storage capacity 75 drums estimated to consist of 25 drums liquid, 25 drums PCB capacitors and 25 drums solid waste containing absorbent material, protective clothing and plastic lining.

25 Drums PCB liquid x $250/drum	$6250.00
25 Drums PCB solids x $250/drum	$6250.00
25 Drums PCB capacitors x $180/drum	$4500.00
Transport for Disposal (Ensco Inc.) 1134 Miles x $3.25/mile	$3685.50
Decontaminate Storage ARea Labor 2 men x 8 hrs. x $12/hr.	$192.00
Supervisor 1 man x 8 hrs. x $28/hr.	$224.00
Cleaning material	$50.00
Residue Testing 2 drums x $100	$200.00
Residue Disposal 2 drums x $125	$250.00
Interior PCB work/storage area containing drained and flushed PCB transformers. Disposal 60,000 lbs. x .10/lb.	$6000.00
Transport for disposal 2 loads x $250/load	$500.00

CLOSURE PLAN

3. STORAGE TANKS

Testing Liquid Waste 3 Samples x $100	$300.00
Disposal 5000 Gals. PCB Liquid Greater than 25000 PPM x $4.00/gal.	$20,000.00
Disposal 5000 Gals. PCB Liquid Less than 25000 PPM x $2.50/Gal.	$12,500.00
Disposal Flush Liquid 3000 Gals. greater than 25000 PPM x $4./gal. . .	$12,000.00
Triple Rinse Tanks New Flush 3900 gals. x .75/gal.	$2,925.00
Labor to rinse tanks 2 men x 8 hrs. x 3 days x $12/hr.	$576.00
Supervisor 8 hrs. x 3 days x $28/hr.	$672.00
Transport to incinerator 4 trips x $1500/trip	$6,000.00

4. PROFESSIONAL ENGINEER CLOSURE CERTIFICATION . . .	$11,000.00
TOTAL	$103,090.50
ADMINISTRATIVE COSTS 10%	10,309.00
CONTINGENCY COSTS 15%	15,463.50
TOTAL CLOSURE COSTS . . .	$128,863.00

CLOSURE PLAN

Closure Schedule:

Approximately six weeks would be required to remove hazardous waste inventories and decontaminate hazardous waste storage areas.

When closure is completed, certification of closure signed by an independent professional engineer, registered in New York State, will be submitted to NYSDEC.

Post Closure

As this facility is engaged only in the storage of hazardous waste in drums, tanks, or PCB articles, there will be no post closure requirements.

written by Anthony Hejmanowski

signed Anthony Hejmanowski date 11-24-86

approved by Richard Conway

signed Richard W. Conway date 11-24-86

PCB DISPOSAL COSTS

	ENSCO	ROLLINS	PITTSFIELD	SCA			PPM	
LIQUIDS								
DRUMS	Per Drum	Per Drum	Per Drum	Per Drum				
(ppm)					PCBs	Flush	Per Drum	
> 100 K	$250	$360	$300	> 100 K	$375	$240	< 10 K	$322
25 K-100 K	250	360	275	10 K-100 K	250	230	< 5 K	258
501-25 K	250	360	180	1 K - 10 K	200	200	< 3.5 K	184
< 500	250	360	150	< 1 K	160	160	< 2.5 K	170
							< 1 K	156
							< 500	147
BULK	Per Lb.	Per Lb.	Per Gal/Lb.	Per Lb.			Per Gal.	
> 25 K Askarel	$.30	$.48	$4.00/.34	> 100 K	$.42		< 10 K	2.76
< 25 K All Other Non-halogenated	.30	.48	2.50/.30	10 K-100 K	.34		< 5 K	1.84
< 500 Non-PCB Oils	.20	.48	2.00/.24	1 K-10 K	.29		< 3.5 K	1.70
				50-1 K	.23		< 2.5 K	1.52
				< 50	.20		< 1 K	1.43
				Rinse Solvent	.39		< 500	1.15
PCB Contaminated Silicone	$300 Test charge then quote.	$.70 max. 52 drums per month.	No	Limited capacity slow feed to incinerator.				
SOLIDS	Per Lb.	Per Lb.						
Capacitors	$.60	$.75	None	Do Not Use				
Solid Waste (Burial)		Refer to (Appendix "D") of EP-HS-30.2 for disposal sites and contact phone numbers. See PCB Landfill Pricing Sheet.						
Debris (Incineration)	$1.00 (Min. $250/drum)		None	$100/Plastic Drum				
TRANSPORTATION								
(Per Loaded Miles)	$3.25	$3.45	$3.25	$3.25				

NOTES:

ENSCO NOTE: PRICES EFFECTIVE FOR ANY SHIPMENT RECEIVED AFTER 3/1/86

1. Will provide capacitor box $150 new -- Reconditioned box at no charge when available. Min. invoice for capacitors in boxes is $1,200. Boxes delivered free when making pickup. Additional boxes at $3.25/loaded mile.
2. PCB capacitors in drums - $180/drum minimum. Small caps and ballasts considered solid waste, call for quote.
3. Bulk transportation - 2 hr. free demurrage, $45/hour thereafter. ENSCO must arrange transportation, min. 35,000 lbs. for bulk shipment. $25/drum charge to pump from drums at GE site.
4. Pricing surcharge — Material placed in storage and surcharge: Up to 180 days no charge, over 180 days call for quote. For bulk liquid no surcharge 210 days or less, over 210 days call for quote.

ROLLINS

1. Must use their bulk carrier - $3.25/ over 800 miles. Sliding scale, under 800 miles from Rollins. St. Joseph and USPCI only other acceptable carriers.

PITTSFIELD

1. We must arrange transportation - See (Appendix "C") EP-HS-30.2 for carriers.
2. Min. 70 drums/truck or add $200/truck.

SCA

1. Bulk transportation - 2 hr. free demurrage, $65/hour thereafter. Will accept any carrier.
2. Includes drum disposal and freight charges Model City to Chicago. Tax add $.01/gal. (Chicago).

GENERAL

1. ENSCO and Pittsfield prices effective through December 1986. SCA and Rollins valid 3 months.
2. Do not attempt to negotiate liquid or capacitor prices as we are negotiating best national price based on GE volume.
3. No one should charge for decontamination of bulk carriers.
4. Silicone is approx. 8.4 lb./gal.

ADDENDUM K

K. SEE COMPLETED QUESTIONNAIRE ATTACHED

Information Regarding Potential Hazardous Waste and Hazardous Waste Constituent Releases From Solid Waste Management Units

Facility Name: General Electric Company

EPA I.D. No.: NYD 0677539940

Location: Street 175 Milens Road

City & State Tonawanda, N.Y. 14150

Check: owner (x) operator

Please review the following definitions prior to proceeding to page 2.

I. Under the Resource Conservation and Recovery Act (RCRA) amendments of 1984, the term "solid waste" means any garbage, refuse, sludge, from a waste treatment plant, water supply treatment plant, or air pollution control facility and other discarded material, including solid, liquid, semisolid, or contained gaseous material resulting from industrial, commercial, mining, and agricultural operations, and from community activities, but does not include solid or dissolved material in domestic sewage, or solid or dissolved materials in irrigation return flows or industrial discharges which are point sources subject to permits under section 402 of the Federal Water Pollution Control Act, or byproduct material as defined by the Atomic Energy Act of 1954.

II. A hazardous waste is a solid waste that is either listed in 40 CFR; Part 2 Subpart D ("List of Hazardous Wastes") or possesses one or more of the cha acteristics identified in 40 CFR; Part 261; Subpart C ("Characteristics of Hazardous Waste") and is not excluded in 40 CFR 261.4.

III. A Hazardous Waste Constituent represents the basis for a specific hazardou waste being listed in 40 CFR; Part 261; Subpart D. The Hazardous Waste Constituents are listed in 40 CFR; Part 261; Appendix VIII (Hazardous Waste Constituents).

IV. The term "solid waste management unit" (SWMU) applies to any landfill, surface impoundment, land farm, waste pile, incinerator, tank, injection well, transfer station, waste recycling operation, tank or container storage area that currently or formerly was used to manage a solid waste.

V. Under the requirements of the Hazardous and Solid Waste Act Amendments of 1984, Section 3004U of the RCRA amendments mandates that EPA address contamination caused by prior releases of hazardous wastes and hazardous waste constituents from solid waste management units, regardless of the time when the waste was placed in the unit or when the unit was closed.

VI. The term "tank" includes wastewater treatment units, elementary neutralization units and short-term accumulation units that are exempted from RCRA permit requirements.

VII. The term "release" includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping or disposing into the environment, but excluding releases otherwise permitted under law (e.g., NPDES permitted discharges).

SPECIFIC INFORMATION

1. Are there any of the following solid waste management units existing or closed at your facility? Include any units you are aware of that were used by previous owners. Do not include hazardous waste units currently shown in your B application.

	Yes	No
• Landfill		X
• Surface Impoundment		X
• Dump-pit or Leach Field		X
• Land Farm		X
• Waste Pile		X
• Incinerator		X
• Storage Tank (above ground)		X
• Storage Tank (below ground)		X
• Container Storage Area	X	
• Injection Wells, Sink Holes		X
• Wastewater Treatment Units		X
• Transfer Stations		X
• Waste Recycling Operations		X
• Other (specify)		X

(For items 2-4, if the space provided is not sufficient, use additional sheets as necessary and specify the item being answered.)

2.) If there are "Yes" answers to any of the items in number one above, please provide the following:

A. A description of the wastes that were stored, treated or disposed of in each unit.

Container storage areas - Wastes in storage for disposal.

1. Waste Polychlorinate Biphenyls ORM-E UN2315.

2. Waste 1,1,1 - Trichloroethane ORM-E NA9189

3. Waste Paint/Varnish UN1263

4. Waste Corrosive Liquid UN1760

B. Determine, as best you can, if the particular waste would be considered a hazardous waste or hazardous waste constituent under RCRA (See definitions on page one)

Waste in Storage Hazard Class

1. B001 THRU B007
2. U226
3. D001
4. D002

C. A description of each unit including its capacity, dimensions, period of operation, location at facility including a site plan if available.

See Attachment A (3 Pages)

Storage Areas:

PCB Work/Storage

PCB Container Storage

Hazardous Waste Storage

3.) For each unit noted in number one and also those hazardous waste units identified in your Part B application, please provide the following information on any prior or current release of hazardous waste or hazardous waste constituents.

source of information that has led to the possibility that a release has occured (i.e. discoloration of surrounding soil)
date(s) of release
groundwater monitoring data for units not identified in your Part B
type of waste/material released
quantity or volume of waste/material released
nature of release (i.e., spill, overflow, ruptured tank or pipeline, leachate from landfill or surface impoundment, etc.)

None

4.) In regard to the prior releases described in number three above, please provide (for each unit) any analytical data that may be available which would describe the nature and/or extent of environmental contamination that exists as a result of such releases. In addition, any information on the concentration of hazardous waste or hazardous waste constituents present in contaminated soil, groundwater or surface water should be attached. Include any information/data (including groundwater monitoring data) submitted to EPA and the State under any other regulatory programs (i.e. Superfund, In place-toxics, etc.) that concerns prior or continuing releases as described above.

NONE

5.) If you do not have any record of a SWMU on your site, is there any evidence from soil borings, drilling of groundwater wells, groundwater monitoring results, exploratory pits or any excavations that would indicate the presence of a SWMU or that a release of hazardous waste or hazardous waste constituent has occured (Please describe the type of activity and observations that led to the discovery)?

NONE

ATTACHMENT A

STORAGE UNIT DESCRIPTION

Facility Description

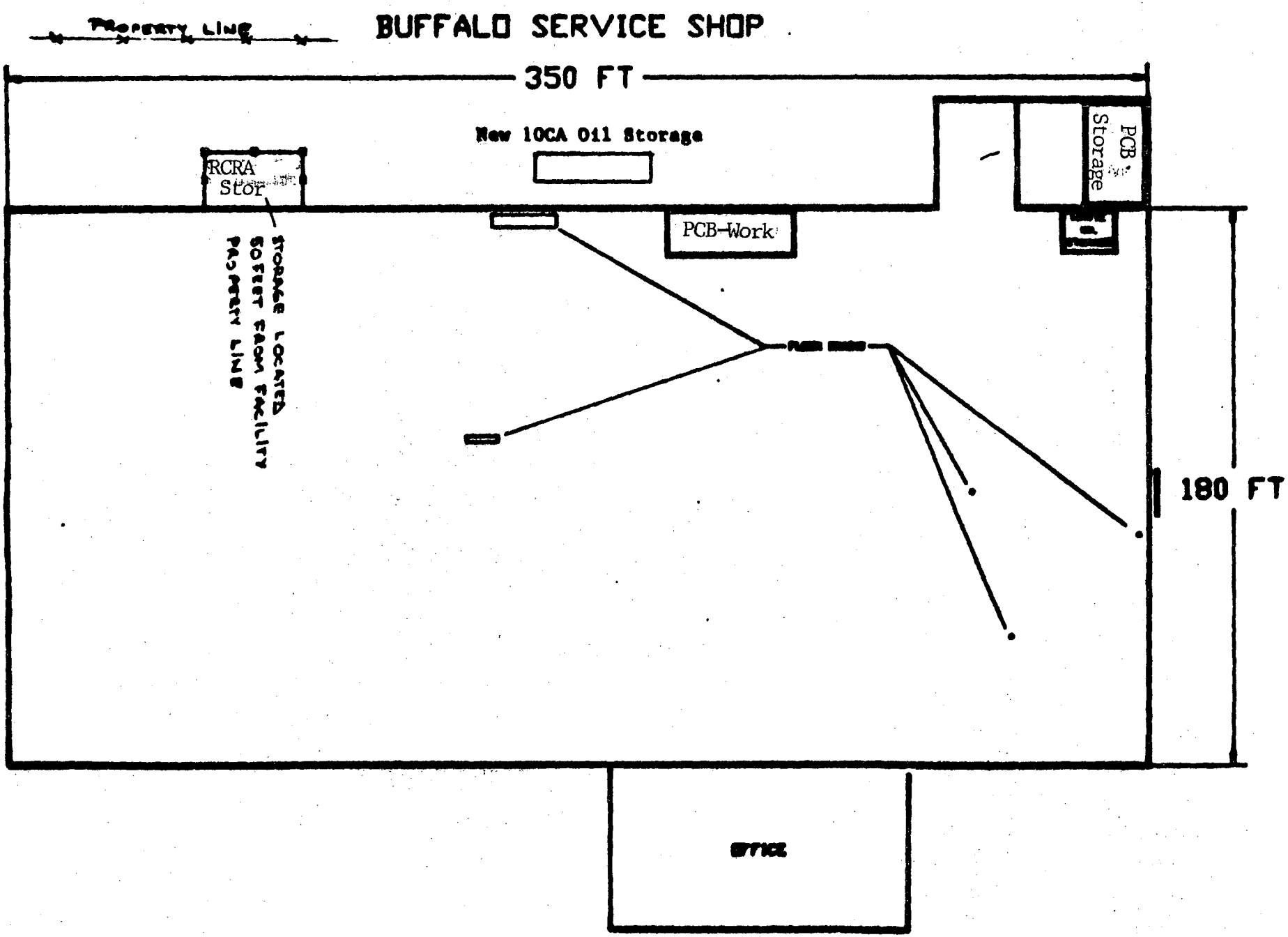
The General Electric Buffalo Service Shop is a 69,000 square foot single building located on 5.3 acres of land at 175 Milens Road, Tonawanda, New York (Exhibit 1). The site location is above the 100 year flood water elevation. The facility consists of approximately 63,000 square feet of one story manufacturing/service area and 6,000 square feet of office area. Located within the building's manufacturing/service area are the following designated storage areas: PCB work and storage areas, RCRA storage area, Waste Oil storage area and above ground new electrical oil storage area.

PCB Work Area - an interior area 37 ft. 3 in. x 13 ft. 10 in. with a 6 inch thick concrete floor enclosed by a 8 inch high x 9 inch thick concrete curb providing secondary containment for 2500 gallons. The PCB work area is used for storage during receiving of PCB items at the facility, in-process storage of PCB items during repair operations, and storage of PCB items used for repair operations. Three portable 275 gallon capacity tanks used for the storage of PCB oil (B001) while performing repairs are also stored in this area. The 275 gallon tanks are of welded low carbon steel construction with an oval configuration 44 inches x 27 inches x 60 inches in length with a 14 gauge wall thickness.

STORAGE UNIT DESCRIPTION

PCB Storage Area - An interior area 24 ft. 6 in. x 21 ft. 6 in. with a 6 inch concrete floor enclosed by a 16 inch high x 9 inch thick concrete curb providing secondary containment for 5,200 gallons. PCB storage area has separate secured access only from the exterior of the facility and is used for PCB items prior to shipment to qualified disposal sites.

Hazardous Waste Storage Area - An exterior 11 ft. x 30 ft. fenced, curbed, covered area on a concrete pad. Curbing is 6 in. x 9½ in. high. Providing containment for 1950 gallons.


PROPERTY LINE
BUFFALO SERVICE SHOP
350 FT
New 10CA 011 Storage
RCRA
Stor
PCB
Storage
PCB-Work
180 FT
OFFICE