

CLOSURE CERTIFICATION
REPORT FOR TRICO PRODUCTS CORPORATION'S
HAZARDOUS WASTE STORAGE FACILITY

Prepared for:
Trico Products Corporation
817 Washington Street
Buffalo, New York 14203

Prepared by:
Snyder Engineering
86 Countryside Lane
Grand Island, New York 14072

Date:
July 8, 1986

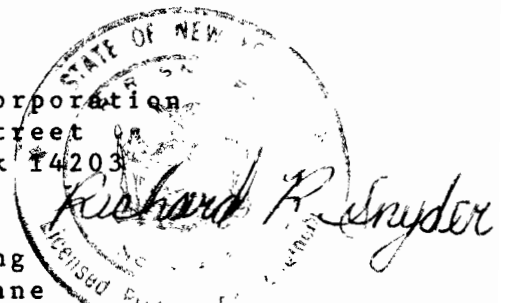


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Closure Certification Report for Trico Products Corporation's Plant #1 Hazardous Waste Drum Storage Facility

1.0 Introduction

The principal objective of this report is to provide a closure certification (as required by 6NYCRR Part 373) for a hazardous waste drum storage facility (EPA Facility I.D. Number NYD002107399). It was located in the Trico Products Corporation's Plant #1 at 817 Washington Street in Buffalo, New York. As the first step in the implementation of the approved facility closure plan all drummed hazardous wastes were removed from the storage facility. These waste materials were sent to government approved hazardous waste management facilities. A sampling and analysis program was developed and implemented to determine whether or not the ceiling, wall, and floor of the storage facility were adequately decontaminated during implementation of the closure process. Based upon the analytical results no significant contamination of the storage area remained upon completion of the final wash and rinse procedures.

Items discussed in this report are as follows:

- (1) Storage area construction and past utilization,
- (2) Storage area closure process,
- (3) Removal of drummed hazardous wastes from storage area to government approved hazardous waste management facilities,
- (4) Closure certification.

2.0 Storage Area Construction and Past Utilization

2.1 Construction

The hazardous waste storage area was established by Trico Products Corporation in 1980 at Plant #1 for indoor storage of drummed hazardous wastes. It was located on the first floor (basement beneath) of a multi-story concrete and brick construction building. The area (15.5 feet by 21.5 feet) contained a concrete floor and was surrounded by a fence with a locked gate to limit access and improve the facility's security.

2.2 Utilization

The hazardous waste storage area was utilized to store drummed hazardous waste materials. The maximum number of drums which could be stored at one time in this area was sixty four (per approved closure report). Waste materials which are known to have been stored in this area include spent trichloroethylene used in degreasing (F-001), spent methylene chloride used in degreasing (F-001), plating sludge containing cyanide (F-008), and plating sludge containing chrome (D-007).

Initially these wastes were managed under the provisions of 40 CFR 262 paragraph 262.34(b) whereby the waste materials were stored for periods in excess of 90 days prior to disposal. Starting in December 1983 these waste materials began to be managed under the

provisions of 40 CFR 262 paragraph 262.34(a) and were accumulated for periods of less than 90 days prior to disposal.

3.0 Hazardous Waste Storage Facility Closure Process

The previously described hazardous waste storage facility was closed per the Closure Plan for a Hazardous Waste Storage Facility (EPA Facility I.D. Number NYD002107399) as submitted to Mr. John L. Middelkoop, P.E. of the New York State Department of Environmental Conservation on July 30, 1985. This facility closure plan was approved by a letter of November 14, 1985 from Mr. John L. Middlekoop, P.E. of the New York State Department of Environmental Conservation.

Trico Products Corporation issued a public notice of closure to provide the public with an opportunity to comment on the contents of the hazardous waste storage facility's closure plan prior to closure implementation. This public notice was issued per the format provided by the New York State Department of Environmental Conservation.

All drummed materials were removed from the hazardous waste storage area prior to its decontamination. Materials which were removed as part of the storage facility's closure included the following:

- (1) Waste trichloroethane (F001) - one 55 gal. drum
- (2) Waste sand contaminated with
chrome and cyanide (F008) - twenty three 55 gal. drums

The waste trichloroethane was shipped to Voelker Analysis, Inc.

in Buffalo, New York on April 14, 1986 (refer to Uniform Hazardous Waste Manifest 340694 8 in Appendix B) and the waste sand contaminated with chrome and cyanide were shipped to SCA Chemical Services in Model City, New York on April 3, 1986 (refer to Uniform Hazardous Waste Manifest 340691 5 in Appendix B).

The storage area was temporarily diked on April 14, 1986, by placing P.I.G. absorbent strips around its perimeter. The storage area's wall, ceiling, and floor were then scrubbed with a detergent wash (contained Neutronyx detergent). Wash water was collected from the floor into 55 gallon drums using a wet vacuum. Upon completion of the wash step (approximately 100 gallons of wash water) the floor was rinsed with clean water. This water was also collected into a 55 gallon drum using a wet vacuum.

Samples were obtained of the wash water, rinse water, and detergent. These samples were taken to Acts Testing Labs for analysis. The choice of analytical parameters was based upon the contaminants which were known to be present in the hazardous waste materials previously stored at this location. Potential contaminants included cyanide, chrome, nickel, copper, and volatile organics. The samples (as received at the laboratory) were analyzed for cyanide, copper, nickel, chrome, and volatile hydrocarbon compounds. Significant concentrations of contaminants were found in both the wash and rinse waters (refer

to Appendix C for test data). Both the wash and rinse waters have been transported off site to a hazardous waste management facility for disposal.

It was therefore necessary to scrub the storage area with an additional detergent wash and rinse. This additional wash was performed on June 2, 1986. Area containment for the wash water was provided by placement of absorbent pads around its perimeter. Approximately 100 gallons of wash water (containing detergent) was collected in 55 gallon drums using a wet vacuum. This was followed by a rinse consisting of approximately 50 gallons which was collected in a separate 55 gallon drum using a wet vacuum. A sample of this rinse water was taken to Acts Testing Lab for testing. The results indicated that the rinse water contained relatively low concentrations of contaminants (refer to Appendix C for test results). The wash water from this wash procedure will be transported off site to a hazardous waste management facility for disposal. Therefore the requirements for storage facility decontamination have been satisfied per the facility's approved closure plan. Facility closure is therefore complete and the facility is deemed satisfactory for utilization as an accumulation area for drummed hazardous waste.

4.0 Closure Certification

This is to certify that Trico Products Corporation's hazardous waste storage facility located at 817 Washington Street

in Buffalo, New York was closed in conformance with the previously approved closure plan (original copy submitted to New York State Department of Environmental Conservation on July 30, 1985 and amended copy submitted on October 10, 1985). As described in this report, all hazardous waste materials being stored in the facility at the onset of closure were transported to approved offsite hazardous waste management facilities.

Based upon visual inspection of the area before, during, and after the closure process and laboratory analyses of samples obtained during the facility's decontamination process, all hazardous waste materials and residues have been removed from the area. No post closure care or post closure monitoring of the area will therefore be required.

Richard R. Snyder
Richard R. Snyder, P.E.

APPENDIX A

Department of Environmental Conservation
Albany, New York 12233-0001



Henry G. Williams
Commissioner

NOV 14 1985

Mr. Albert J. Kemnitzer
Plant Engineer
Trico Products Corporation
Buffalo, NY 14203

Dear Mr. Kemnitzer:

Re: Closure Plan for NYD002197399

As part of a request for reclassification of the above referenced facility to a generator only status, you were asked by this Department to submit a closure plan addressing activities to take place when the facility is actually being closed. As requested, the closure plan was submitted, and upon review, it is deemed that this plan meets the performance standards as stipulated in 6 NYCRR Part 373, and hereby, its approval is granted. As a generator-only facility all storage of hazardous materials must be less than 90 days.

Termination of your facility's RCRA status may now proceed by one of two methods. You may implement the closure plan in either the present or future. If you choose to close the hazardous waste management area imminently, the first step is to issue a public notice of closure to allow the public to comment on the contents of the closure plan before implementation. Next, the area is closed by following all steps in the approved plan, and a certification of closure is then provided by the owner/operator and an independent professional engineer. This closure certification legally terminates interim status. The area is then "reopened" as a generator-only unit. If you choose this option, this office will provide the required format for the public notice of closure.

If you choose to close the area in the future, interim status is terminated through denial of the Part B permit. The next step for this process is to write to EPA requesting that a Part B permit be called in for your facility. Upon receipt of your request, EPA will publish a Notice of Intent to deny the RCRA Part B Permit, which is legally required to withdraw the Part A Permit. One requirement for future closure is that financial assurance for the closure cost estimate must be maintained until the date of closure. At that time, the public notice of closure must be issued, and the closure process outlined above must be implemented.

The request for Part B Denial should be forwarded to:

Mr. Richard A. Baker
Chief
Permits Administration Branch
U.S. Environmental Protection Agency
26 Federal Plaza
New York, New York 10278

TRICO PRODUCTS CORPORATION

BUFFALO, NY 14203

Certified Return
Receipt Requested

October 10, 1985

George W. Heitzman Chemical Engineer
Bureau of Hazardous Waste Technology
Division of Solid and Hazardous Waste
New York State Department of
Environmental Conservation
50 Wolf Road
Albany, New York 12233-0001

Re: Reclassification of Trico Products
EPA I.D. No. NYD 002107399

Dear Mr. Heitzman:

This letter is to confirm your recent visit with Messrs. Robert Haggerty and Nelson Schnabel of the New York State Department of Environmental Conservation on Tuesday, October 8, 1985 at our Plant #1.

The purpose of the visit was to review the Closure Plan we have submitted relating to a hazardous waste storage area at our Plant #1.

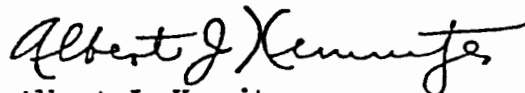
As a result of this review we wish to confirm and clarify our intent with respect to certain phases of the Closure Plan as per your request and as follows:

1. We will treat all cleaning residue as hazardous waste during the closure process.
2. We will temporarily berm the area with suitable absorbent material during the closure process.
3. Since the area continues to be used as an accumulation area we wish to advise that we will be using the area for the additional accumulation of drum quantities of waste isopropanol D001.

With the presentation of this additional information and coupled with your inspection of the site we trust that our Closure Plan will now receive final approval.

Very truly yours

TRICO PRODUCTS CORPORATION



Albert J. Kemmitzer
Plant Engineer

TRICO PRODUCTS CORPORATION

BUFFALO, NY 14203

July 30, 1985

John L. Middelkoop P.E.
NYS Department of Environmental Conservation
Bureau of Hazardous Waste Technology
Permits Section
50 Wolf Road - Room 401
Albany, N.Y. 12233-001

Re: Reclassification of Trico Products
EPA I.D. No. NYD 002107399

Dear Mr. Middelkoop:

In response to your letter of July 17, 1985, enclosed is a Closure Plan relating to a hazardous waste storage area at Trico Products Corporation, Plant No. 1.

Hopefully this plan includes the desired detail and will be approved.

Very truly yours

TRICO PRODUCTS CORPORATION

Albert J. Kemnitzer
Plant Engineer

JW/dw
Enc:



Closure Plan

Hazardous Waste Storage Area

I. Purpose

To delineate a plan of the steps necessary for the orderly and complete closure of the hazardous waste storage area at Trico Products Corporation, Plant 1, 817 Washington St., Buffalo, N.Y. 14203, USEPA, I.D. NYD 002107399.

II. Background

A hazardous waste storage area was established in 1980, to permit this facility to manage hazardous wastes under the provision of 40 CFR 262, paragraph 262.34 (b) whereby the waste was stored for periods in excess of 90 days prior to disposal. In December 1983, hazardous waste began to be managed under the provision of 40 CFR 262 paragraph 262.34 (a) and is accumulated for periods of less than 90 days prior to disposal. The same classifications of wastes continued to be accumulated in the identical area and under the same general conditions as when they were stored.

III. Facility Condition

- A. 1. Trico Products Corporation, Plant 1 is an automotive parts manufacturing facility located in an urban setting within the city of Buffalo. The factory consists of a series of abutting and interconnected multi-story buildings occupying a complete city block approximately 264' by 329'. Directly adjoining are a series of buildings which are utilized primarily for administration, engineering, etc. (see attached plot plan). Hazardous wastes have been generated at several different locations within the factory building complex.
2. These wastes were stored within a pad locked, fenced-in enclosure measuring 15' - 6" by 21' - 6". This enclosure is located on the first floor (basement beneath) of a multi-story concrete and brick construction building.
3. Only drummed material was stored. Based on a maximum of four (4) drums per pallet, with pallet loads double stacked, the maximum physical capacity of this enclosure is 64 drums. See attached sketch.
4. Beginning in 1980 and thru 1983 the following wastes have been stored in this area:

Spent trichloroethylene used in degreasing	F-001
Spent methylene chloride used in degreasing	F-001

Plating sludge from bottom of tank (cyanide)	F-008
Plating sludge from bottom of tank (chrome)	D-007
PCB Capacitors	B-007

5. The maximum inventory of material to be disposed of at time of closure is 64 drums together with 16 wooden pallets.
- B. Waste was placed in drums and sealed at point of generation. A fork truck was utilized to handle pallet loads of waste in the storage area and from the storage area to the shipping dock.
- C. Schedule of Closure

<u>Completion Date</u>	<u>Action</u>
Implementation Date	-
Plus week 1	1. Contact disposal facility for authorization and pricing. 2. Contact decontamination contractors. 3. Contact certifying engineer.
Plus week 3	1. Complete waste removal. 2. Initiate decontamination.
Plus week 5	Complete analysis of decontamination residue.
Plus week 8	Complete decontamination residue removal.

IV. Removing All Inventory

- A. The maximum quantity of waste to be disposed of at closure is 64, fifty five gallon drums and 16 wooden pallets. No other equipment is involved with waste processing. If a spill or leakage should be encountered, the fork truck used for handling is to be included in the decontamination procedure.
- B. Based on recent hazardous waste generation history, approximately 75% of this waste are various types of solvents which are processed for materials recovery by outside contractors. The balance is chrome bearing solid waste which is suitable for burial in a secure land fill.
- C. Solvent recovery contract operations are available within the city of Buffalo or its nearby suburbs limiting travel distance to a maximum of 10 miles for this disposal procedure. Secure landfills are available in Niagara County, a distance of approximately 22 miles.

V. Facility Decontamination

- A. The area to be decontaminated is interior to a building of concrete and brick construction. The floor is of concrete construction with no active collectors leading to the sewer system.
- B. It is intended that the area be temporarily diked to contain the liquid residue of the decontamination procedure. The ceiling, wall and floor are then to be scrubbed with a series of detergent washes.

The liquid residue will be collected and a laboratory determination will be made for evidence of contamination.

If residue is contaminated it will be transported off site to a hazardous waste management facility for disposal.

If there is no evidence of contamination, the residue will be discharged to the municipal sewer system.

The wash procedure will be repeated until the residue is contamination free.

- C. The three surfaces to be decontaminated (floor, wall and ceiling) comprise a total of 990 square feet. It is estimated that approximately 125 gallons of liquid residue will result from each complete wash sequence

II. Closure Certification

- A. Upon completion of closure activities it will be certified by both the facility owner and an independent registered professional engineer that this facility was closed in accordance with the specifications contained in the approved Closure Plan.
- B. Once it has been determined that closure is to occur it is intended that the certifying engineer will at a minimum:
 - 1. Observe area prior to initiating waste removal action and conduct inventory.
 - 2. Review contracts, manifests, etc. to insure proper disposal of complete inventory.
 - 3. Observe decontamination action.
 - 4. Review laboratory analyses of residue from decontamination.
 - 5. Verify proper disposal of residue.
 - 6. Such other inspections as he may deem necessary.

VII. Closure Cost Estimate

1.	Labor for inventory removal	
	a. Provided by operator	
	b. 16 man hours @ \$20.00/hour	\$ 320.00
2.	Labor for decontamination	
	a. Qualified, insured contractor	
	b. 72 man hours @ \$35.00/hour	2520.00
3.	Disposal of inventory	
	64 drums @ \$85.00/drum	5440.00
	Transportation	350.00
4.	Disposal of residue	
	3 drums @ \$85.00/drum	255.00
	Transportation	350.00
5.	Closure certification	1500.00
6.	Contingent cost	2147.00
7.	Administration cost	1610.00
	Grand Total	14,492.00

APPENDIX B

STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

HAZARDOUS WASTE MANIFEST

P.O. Box 12820, Albany, New York 12212

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

a print or type.

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA No. **NY D 0 0 2 1 0 7 3 9 9 0 0 0 1 4** 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
Trico Products Corporation Plant #1
817 Washington Street Buffalo, New York 14203

4. Generator's Phone (**716**) **852-5700**

A. State Manifest Document No. **NY A 340691 5**

B. Generator's ID **Same**

5. Transporter 1 (Company Name) **Hazmat Environmental Group** 6. US EPA ID Number **NY D 9 3 0 7 6 9 9 4 7**

C. State Transporter's ID **67237-60(R14)**

D. Transporter's Phone (**716**) **877-5533**

7. Transporter 2 (Company Name) 8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone ()

9. Designated Facility Name and Site Address
SCA Chemical Services
1550 Balmer Road
Model City, New York 14107 10. US EPA ID Number **NY D 0 4 9 3 3 6 6 7 9**

G. State Facility's ID

H. Facility's Phone (**716**) **754-8231**

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)

12. Containers No. Type 13. Total Quantity 14. Unit Wt/Vol 15. Waste No.

a. **Hazardous waste Solid N.O.S. ORH-E NA 9189**

0 2 3 **DR** **0 1 1 5 0** **G** **F008**

b.

c.

d.

J. Additional Descriptions for Materials listed Above
Sand Contaminated
w/Chrome & w/Cyanide **11 + 7**

K. Handling Codes for Wastes Listed Above

a. b. c. d.

15. Special Handling Instructions and Additional Information
N.O. 105471
Product Code F11242
Please forward copy no. 3 to:
Trico Products Corporation ATTN: James A. Ross
817 Washington Street
Buffalo, New York 14203

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations.
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 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 **R.R. Roehboldt** Signature Mo. Day Year **6 4 6 5 8 5**

17. Transporter 1 (Acknowledgement of Receipt of Materials)
Printed/Typed Name Signature Mo. Day Year **6 4 6 5 8 5**

18. Transporter 2 (Acknowledgement or Receipt of Materials)
Printed/Typed Name Signature Mo. Day Year

19. Discrepancy Indication Space

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

Printed/Typed Name Signature Mo. Day Year

In case of emergency or spill immediately call the National Response Center (800) 424-8802 and the N.Y. Department of Transportation (518) 457-7362.

GENERATOR

TRANSPORTER

FACILITY

NYA 340691 5



STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

HAZARDOUS WASTE MANIFEST

P.O. Box 12820, Albany, New York 12212

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

Please print or type.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA No. <i>NYD0102167399661015</i>	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 <i>TRICO PRODUCTS CORP PLANT 1 817 WASHINGTON ST. BUFFALO NY 14203</i>		4. Generator's Phone <i>(716) 852-5700</i>		A. State Manifest Document No. <i>NYA 340694 8</i>		
5. Transporter 1 (Company Name) <i>MARYA TRUCKING</i>		6. US EPA ID Number <i>NYD0102114771</i>		B. Generator's ID <i>SAME</i>		
7. Transporter 2 (Company Name)		8. US EPA ID Number		C. State Transporter ID <i>09143692</i>		
9. Designated Facility Name and Site Address <i>VOELKER ANALYSIS INC. 766 BABCOCK ST. BUFFALO, N.Y. 14206</i>		10. US EPA ID Number <i>NYD9911291782</i>		D. Transporter Phone <i>(716) 856-8660</i>		
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)		12. Containers	13. Total Quantity	14. Unit	15. Waste No.	
a. <i>WASTE TRICHLOROETHANE ORM-A UN083</i>		No. Type		Wt/Vol	Waste No.	
Additional Descriptions for Materials listed Above <i>135</i>		K. Handling Codes for Wastes Listed Above				
		a. <input checked="" type="checkbox"/> R <input type="checkbox"/> S <input type="checkbox"/> T <input type="checkbox"/> X <input type="checkbox"/> Y <input type="checkbox"/> Z				
		b. <input type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/> E <input type="checkbox"/> F <input type="checkbox"/> G <input type="checkbox"/> H <input type="checkbox"/> I <input type="checkbox"/> J <input type="checkbox"/> L <input type="checkbox"/> M <input type="checkbox"/> N <input type="checkbox"/> O <input type="checkbox"/> P <input type="checkbox"/> Q <input type="checkbox"/> V <input type="checkbox"/> W <input type="checkbox"/> X <input type="checkbox"/> Y <input type="checkbox"/> Z				
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 and state laws and 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 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 <i>R. R. ...</i>		Signature <i>[Signature]</i>		Mo. Day Year <i>4 11 11</i>		
17. Transporter 1 (Acknowledgement of Receipt of Materials)						
Printed/Typed Name <i>[Name]</i>		Signature <i>[Signature]</i>		Mo. Day Year <i>4 11 11</i>		
18. Transporter 2 (Acknowledgement or Receipt of Materials)						
Printed/Typed Name		Signature		Mo. Day Year		
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name		Signature		Mo. Day Year		

In case of emergency or spill immediately call the National Response Center (800) 424-8802 and the N.Y. Department of Transportation (518) 457-7382.

NYA 340694 8

APPENDIX C

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 6-7875
JM # 29226

June 30, 1986

Mr. James Ross
TRICO PRODUCTS

SUBJECT:

Analysis of one sample for various parameters received on June 4, 1986.

RESULTS:

Rinse Water - Storage
Area at Plant #1, 6/4/86

Total Cyanide	2.94
Chromium	0.41
Nickel	0.4
Copper	5.00
Chlorinated Solvents	LT 0.001

LT = Less Than

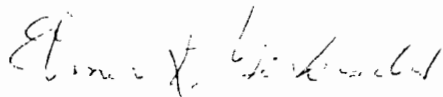
Results are reported as milligrams per liter (mg/l).

EXPERIMENTAL:

The sample was analyzed for chlorinated solvents in accordance with approved Environmental Protection Agency Methodology 601: Purge and Trap Gas Chromatography.

Metals and cyanide were evaluated in accordance with "Standard Methods for Examination of Water and Wastewater", 15th Edition, 1980.

ACTS TESTING LABS, INC.



Elmer K. Gerbracht
Technical Director

/sms

ACTS TESTING LABS, INC.



Connie A. Finocchi
Chemistry Laboratory Manager



STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

HAZARDOUS WASTE MANIFEST

P.O. Box 12820, Albany, New York 12212

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

Please print or type.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA No. NYD000210739900039		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 Trico Products Corporation Plant #1 817 Washington Street Buffalo, New York 14203						A. State Manifest Document No. NYA 418822 7					
4. Generator's Phone (716) 862-5700						B. Generator's ID					
5. Transporter 1 (Company Name) Homet Environmental Group				6. US EPA ID Number NYD980769947		C. State Transporter's ID 184416V					
7. Transporter 2 (Company Name)						D. Transporter's Phone (716) 807-5533					
9. Designated Facility Name and Site Address Frontier Chemical Waste Process Inc. 4626 Royal Avenue Niagara Falls, NY 14302						E. State Transporter's ID					
10. US EPA ID Number NYD043815703						F. Transporter's Phone					
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol	
a. Hazardous Waste Liquid, N.O.S., NA 9189						No. Type		Quantity		Waste No.	
						0 0 3 DM		0 0 1 5 0		G	
b.											
c.											
d.											
J. Additional Descriptions for Materials listed Above WASHWATER CONTAINING CYANIDE CARBONATE A.O.O.						K. Handling Codes for Wastes Listed Above					
a.						a.					
b.						b.					
c.						c.					
d.						d.					
15. Special Handling Instructions and Additional Information W.O. R1-1765 Product Code 1173-895						U.T.S. Order No. 3044 Please forward copy no. 3 of this manifest to: Trico Products Corporation ATTN: James A. Ross 817 Washington Street Buffalo, New York 14203					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations. 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 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 R. R. Roeholdt				Signature				Mo. Day Year 0 7 2 4 8 6			
17. Transporter 1 (Acknowledgement of Receipt of Materials)											
Printed/Typed Name				Signature				Mo. Day Year 0 7 2 4 8 6			
18. Transporter 2 (Acknowledgement or Receipt of Materials)											
Printed/Typed Name				Signature				Mo. Day Year			
19. Discrepancy Indication Space											
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.											
Printed/Typed Name				Signature				Mo. Day Year			

In case of emergency or spill immediately call the National Response Center (800) 424-8802 and the N.Y. Department of Transportation (518) 457-7362.

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