CLOSURE REPORT FOR PRATT & LAMBERT HAZARDOUS WASTE STORAGE FACILITY

E.P.A. I.D. NO. NYD002113322

Prepared by:
Michael A. Balent, P.E.

December 3, 1987

CONTENTS

to the New York State Department of Environmental Conservation. The plan which outlined Pratt & Lambert's intended actions was tentatively approved by the New York State Department of Environmental Conservation on June 24, 1987. This approval, along with the detailed Closure Plan, can be found in Section 3.

C. PUBLIC NOTICE

Under Federal and New York State Regulations, 40 CFR Section 265.112 and GNYCRR 373.-3.7 respectively, owners and operators of TSD Facilities are required to notify the affected public for comment through a newspaper notice once a Closure Plan has been submitted for the particular facility.

On August 27, 1987, notice of the planned closure of Pratt & Lambert's Hazardous Waste Storage Facility (EPA ID#NYD002113322) appeared in the local newspaper "Buffalo Evening News". The notice followed a New York State Department of Environmental Conservation provided format. An "Affidavit of Publication" was subsequently submitted to the New York State Department of Environmental Conservation on September 1, 1987 (see Section 4).

D. WASTE REMOVAL/PROPER DISPOSAL

Pratt & Lambert's approved Closure Plan states:

> Hazardous wastes stored within the facility will be removed on a regular schedule by a Pratt & Lambert permitted vehicle or other permitted transport service and delivered to one of three permitted incineration facilities.
>
> Ross Incineration Services - Grafton, Ohio
>
> Hukill Chemical Corporation - Bedford, Ohio
>
> Systech Corporation - Xenia, Ohio
>
> All three facilities are within 375 road miles of our Buffalo plant.

A copy of the appropriate Hazardous Waste Manifest verifying the above action by Pratt & Lambert can be found in Section 5 of this report. Ross Incineration Services listed above was utilized as the disposal site.

E. DECONTAMINATION OF STORAGE AREAS

Pratt & Lambert's Closure Plan requires the following Decontamination Procedure:

> "Each hazardous waste storage area will be cleaned of any solid material that may have collected. The floors will then be washed with water. Tools used during decontamination will also be washed with water. All resulting material will be disposed of as a hazardous waste."

The three Hazardous Waste Storage areas were decontaminated utilizing the above procedure as per the schedule listed below:

Area	Decontamination Accomplished
Bldg. 27A	Week of October 11, 1987
Outside Bldg. 1A	Week of November 1, 1987
Bldg. 2	Week of November 15, 1987

F. WIPE SAMPLING/ANALYSIS

On October 14, 1987, a representative from Advanced Environmental Service witnessed by the writer, obtained a total of four (4) samples from the floor area of storage area Bldg. 27A. At the time of the sampling all wastes had been previously removed and the site decontaminated as outlined in Pratt & Lambert's Closure Plan. The sampling/analysis that was accomplished followed standard accepted procedures, the details of which are shown in Section 6 of this report. The samples were analyzed for lead and hexavalent chromium. A summary of data generated is as follows:

BLDG. 27A ANALYTICAL TEST RESULTS

	Lead	Hexavalent Chromium
S1	BQL	BQL
S2	BQL	BQL
S3	BQL	BQL
S4	BQL	BQL

Based on the above, the site was deemed to be free of contamination of the two test parameters.

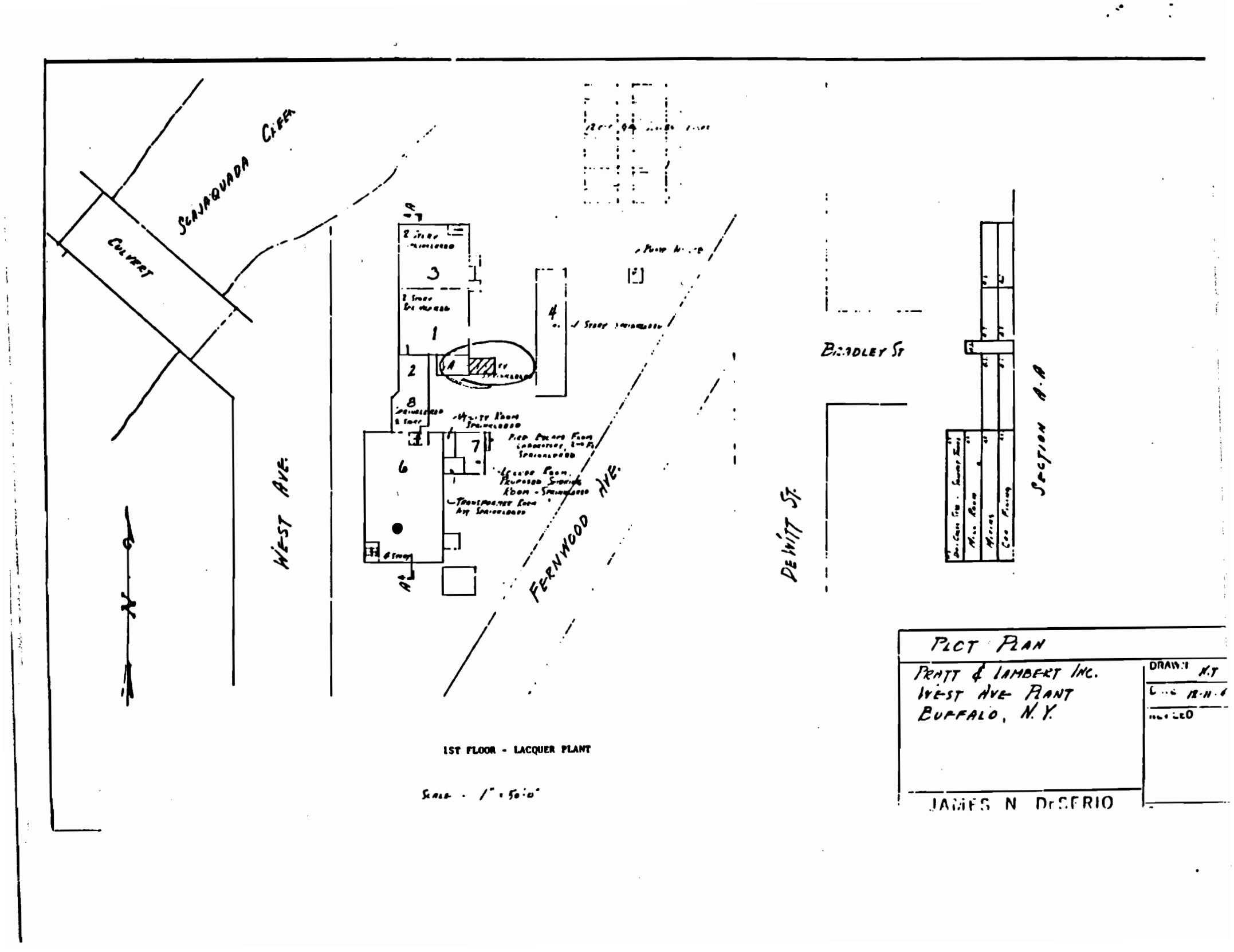
On November 5, 1987, the above procedure was also followed for the second storage area, namely Outside Bldg. 1A. The test results for this particular area in summary form are as follows:

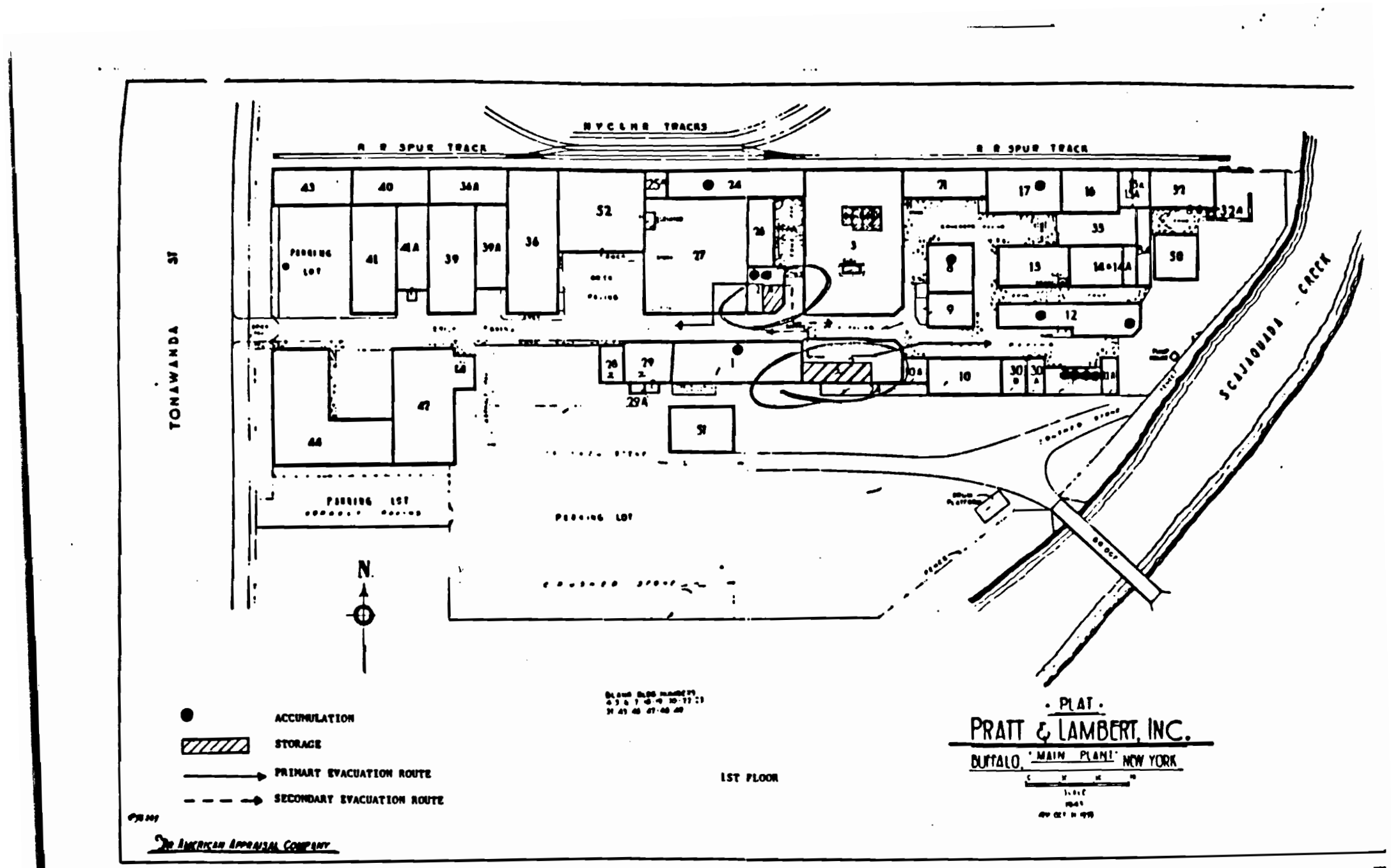
OUTSIDE BLDG. 1A ANALYTICAL TEST RESULTS

	Lead*	Hexavalent Chromium
S1	0.4 mg/m^2	BQL
S2	0.36 mg/m^2	BQL
S3	0.25 mg/m^2	BQL
S4	0.24 mg/m^2	BQL

* Sample area = 1 square meter

Note lab analysis of blank samples


SCAJAQUADA CREEK
CULVERT
WEST AVE.
FERNWOOD AVE.
DEWITT ST.
BRADLEY ST
SECTION A-A
1ST FLOOR - LACQUER PLANT
SCALE - 1" = 50'-0"
PLOT PLAN
PRATT & LAMBERT INC.
WEST AVE PLANT
BUFFALO, N.Y.
DRAWN N.T
JAMES N. DeSERIO


N.
TONAWANDA ST
SCAJAQUADA CREEK
N.Y.C. & H.R. TRACKS
R.R. SPUR TRACK
R.R. SPUR TRACK
PARKING LOT
PARKING LOT
PARKING LOT
ACCUMULATION
STORAGE
PRIMARY EVACUATION ROUTE
SECONDARY EVACUATION ROUTE
1ST FLOOR
• PLAT •
PRATT & LAMBERT, INC.
BUFFALO, "MAIN PLANT" NEW YORK
The American Appraisal Company

F-Level

PRATT & LAMBERT
Paints/Chemical Coatings/Adhesives
75 TONAWANDA STREET/BUFFALO, N.Y.

CLOSURE PLAN
FOR
HAZARDOUS WASTE STORAGE AREAS

PRATT & LAMBERT, INC.
BUFFALO, NEW YORK

GENERAL INFORMATION

Hazardous wastes generated during the manufacture of Trade Sales Paints and Industrial Coatings are accumulated in 55 gal. steel drums located in specific authorized "accumulation areas" throughout the plant. Drums located in these specified areas are marked with:

1. A Pratt & Lambert waste stream code designation
2. A departmental drum number sequenced for auditing capabilities
3. Appropriate hazardous waste labels.

Each drum is sealed and dated when filled. An internal waste manifest is then prepared and the drum is moved by operating personnel to designated storage areas where they remain until moved off-site for incineration. An inventory record is generated in the Plant Manager's office to audit aging of drums and guarantee timely disposal. On a predetermined schedule wastes are moved on a Pratt & Lambert permitted vehicle or other permitted carrier to a permitted and company approved disposal facility. All personnel involved in the handling of hazardous wastes receive annual training in procedures, requirements, and all potential hazards involved. (Attached are drawings of our Buffalo facility showing floor by floor locations of all our accumulating areas, and of our 3 hazardous waste storage areas. The accumulation points are indicated by a black dot. The hazardous waste storage areas are highlighted with hashmarks and for your benefit, circled in red.

The total area committed to the storage of Hazardous Waste is 1690 square feet:

Bldg 27A	450	SQ FT
Bldg 2	756	SQ FT
Outside Bldg 1A	484	SQ FT
Total	1690	

Wastes generated at Buffalo fall into 5 basic categories. The five are:

1. Solvent Paint wastes and sludges.
2. Caustic Wash water
3. Caustic water sludge
4. Water/solvent mixtures
5. Wash solvent from the Industrial products plant

Attached are "Waste Product Surveys" originally generated for Ross Incineration, our primary hazardous waste disposal facility. These documents describe the waste streams and profile their physical and chemical characteristics.

Inventory records of hazardous waste on hand indicate a total of 151 drums presently held in the prescribed storage areas. Stringent restrictions recently instituted within the manufacturing area have markedly reduced daily generation to 2 drums. At our present rate of generation we will accumulate approximately 130 additional drums by our scheduled February 27,1987 closing date. Continued shipments combined with reduced generation rates, should reduce inventory levels as we approach the date set for closure.

Since our hazardous wastes are so similar in character to materials normally handled within the facility there is no equipment specifically designated to the handling of our waste drums.

REMOVAL OF INVENTORY

Hazardous wastes stored within the facility will be removed on our regular schedule by a Pratt & Lambert permitted vehicle or other permitted transport service and delivered to one of three permitted incineration facilities.

Ross Incineration Services - Grafton, Ohio
Hukill Chemical Corporation - Bedford, Ohio
Systech Corporation - Xenia, Ohio

All three facilities are within 375 road miles of our Buffalo Plant.

FACILITY DECONTAMINATION

All hazardous waste is stored at Buffalo in 55 gallon drums on a concrete pad or flooring. Each hazardous waste storage areas will be cleaned of any solid material that may have collected. The floors will then be washed with water. Tools used during decontamination will also be washed with water. All resulting material will be collected and disposed of as hazardous waste. We anticipate generating no more than 300 gallons of material, primarily wash water, during decontamination procedures. We will conduct a "wipe test" on the floor of each decontaminated storage area in a manner recommended by a local testing laboratory. The samples will be tested for lead and hexavalent chromium.

To ensure continued legal operation of the plant, storage areas will be decontaminated and closed sequentially. Areas cleaned and certified closed will be returned to the storage of hazardous waste under "generator" status.

CLOSURE CERTIFICATION

Upon completion of closure activities, the closure will be certified, by both the owner of the facility and an independent registered professional engineer, that the facility has been closed in accordance with the in the approved closure plan. Because of the limited area involved, we anticipate the need for no more than 4 inspections by the certifying engineer.

CLOSURE SCHEDULE

January 2, 1987 - Receive closure plan approval from N.Y.S.D.E.C.

January 12, 1987 - Removal of hazardous waste drums from Building 27A storage area completed

January 16, 1987 - Decontamination of Building 27A storage area completed. Wipe sample taken and submitted to local testing laboratory

January 30, 1987 - Building 27A storage area certified closed

February 6, 1987 - Removal of hazardous waste drums from Building 2 and Building 1A storage areas completed

February 13, 1987- Decontamination of Building 2 and Building 1A storage areas completed. Wipe samples taken and submitted to local testing laboratory

February 27, 1987- Building 2 and Building 1A storage areas certified closed

COST OF CLOSURE

All internal closure operations will be performed by operating personnel. Our estimate of closure costs is:

Waste Disposal Costs	$ 37,500.
Internal Labor	$ 2,000.
Laboratory Testing	$ 500.
Cost of Closure Certification	$ 1,000.
Disposal of accumulated material resulting from Decontamination	$ 1,500.
Sub Total	$ 42,500.
Contingencies 20%	$ 8,500.
Administrative 15%	$ 6,375.
Total	$ 57,375.

New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233-

Henry G. Williams
Commissioner

JUN 24 1987

Mr. Eugene LeVea
Project Engineer
Pratt & Lambert
P.O. Box 22
Buffalo, NY 14240

Dear Mr. LeVea:

Re: Reclassification to generator-only status of NYD002113322

This Department has reviewed the above-referenced closure plan and hereby grants tenative approval of the plan. Your facility now has two options for proceeding with reclassification.

One option is to close the regulated area imminently according to the plan and then "reopen" the area as a generator-only unit. Upon receipt of the closure certification, the facility's authority to operate as a TSDF in New York State will be terminated.

The alternative is to maintain financial assurance for the amount of closure until the regulated area is ultimately closed. The facility will be required to modify its operation to that of a generator-only, and its authority to operate as a TSDF in New York State will be terminated as well. The facility's interim status is terminated by denial of the 373 permit application after all HSWA corrective action requirements are met.

Note that while it is clear that liability for regulatory fees terminates when closure certification is approved by this office, we have not received a legal ruling as to when fee liability ends for the future closure option.

Please indicate how you wish to proceed with reclassification of the facility. If you choose to close the facility imminently, we will provide you with instructions for the public notice. If you have any questions, please call me at (518) 457-3274.

Sincerely,

George W. Heitzman
Facility Permit Section
Bureau of Hazardous Waste Operations
Division of Solid and Hazardous Waste

cc: R. Mitrey

GWH:wp

PRATT&LAMBERT
Paints/Chemical Coatings/Adhesives
75 TONAWANDA STREET/BUFFALO, N.Y.

September 1, 1987

Mr. George Hietzman
Assistant Sanitary Engineer
Facility Permit Section
Bureau of Hazardous Waste Operations
Division of Solid and Hazardous Waste
New York State Department of Environmental Conservation
50 Wolf Road
Albany, New York 12233

Dear Mr. Heitzman:

RE: Closure of Buffalo Facility E.P.A. ID No.NYD002113322

Attached is the required "Affidavit of Publication" covering the "Public Notice" of closure that appeared in the August 27 edition of the Buffalo Evening News.

Please feel free to contact me if I can be of further assistance.

Yours truly,

Eugene G. LeVea
Project Engineer

EGL:jh

Attached

Copies: M. M. Galbraith
D. W. Smith
J. C. MacLauchlan

State of New York

ERIE COUNTY
CITY OF BUFFALO

CLOSURE PLAN FOR PRATT & LAMBERT

Notice is hereby given that Pratt & Lambert (EPA I.D. NYD002113322) has applied to the New York State Department of Environmental Conservation (NYSDEC) under the provisions of the Resource Conservation and Recovery Act (RCRA) and 6NYCRR Part 373-3 for closure of its hazardous waste storage area at 75 Tonawanda Street, Buffalo. The applicant's closure plan details steps that will be taken to decontaminate the drum storage area. The closure plan is available for public review during normal business hours at the Region 9 office of the NYSDEC, located at 600 Delaware Avenue, Buffalo, NY 14202. Interested persons with reasonable concerns over inadequacy or insufficiency of the closure plan have an obligation to raise all reasonably ascertainable issues and submit, in writing, all available arguments and factual grounds supporting their position to the Regional Solid Waste Engineer at the Region 9 office no later than September 25, 1987.

In lieu of, or in addition to, the submission of comments as above, any interested persons may request a public hearing. Any request for an informal public hearing must be made in writing, stating the nature of the issues proposed to be raised in the hearing, and be submitted to the Regional Solid Waste Engineer at the aforementioned address no later than September 25, 1987. If a public hearing is held, the public comment period in this Notice shall automatically be extended to the closure of the public hearing.

D. Eileen Perry

of the City of Buffalo, New York, being duly sworn, deposes and says that s he is Principal Clerk of the BUFFALO EVENING NEWS, INC., Publisher of THE BUFFALO NEWS, a newspaper published in said city, that the notice of which the annexed printed slip taken from said newspaper is a copy, was inserted and published therein once a week for ~~xxxxxxxxxxxxxxxxxxxxxx~~ weeks, the ~~first~~ insertion being on the 27th day of August 19 87 ~~and the last insertion being on the xxxxxxx day of xxxxxxxxxxxxxxx, 19xxxxx~~

D. Eileen Perry

Sworn to before me this 27th day of August, 19 87

Harold A. Mann

HAROLD A. MANN
Notary Public, State of New York
Qualified in Erie County
My Commission Expires November 30, 19 88

Notary Public, Erie County, N.Y.

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

AZARDOUS WASTE MANIFEST

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

Please print or type.

Form Approved. OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's US EPA No. / Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal Law.
	N Y D 0 0 2 1 1 3 3 2 2 0 3 3 9 5		

3. Generator's Name and Mailing Address
PRATT & LAMBERT, INC.
75 TONAWANDA STREET, BUFFALO, NY 14207
4. Generator's Phone 716 873-6000

A. State Manifest Document No. NYFA 610339 5
B. Generator's ID SAME
C. State Transporter's ID NY 27862
D. Transporter's Phone (716) 873-6000
E. State Transporter's ID
F. Transporter's Phone
G. State Facility's ID
H. Facility's Phone 216 748-2171

5. Transporter 1 (Company Name) — 6. US EPA ID Number
PRATT & LAMBERT, BUFFALO, NY 14207 — N Y D 0 0 2 1 1 3 3 2 2
7. Transporter 2 (Company Name) — 8. US EPA ID Number

9. Designated Facility Name and Site Address — 10. US EPA ID Number
ROSS INCINERATION SERVICES, INC.
394 GILES ROAD
GRAFTON, OH 44044 — O H D 0 4 8 4 1 5 6 6 5

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	Waste No.
a. WASTE-FLAMMABLE LIQUID NOS UN 1993 (SOLVENT PAINT SLUDGE) WPS 21773	043	D M	2 1 5 0 0	P	D001
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above — K. Handling Codes for Wastes Listed Above
a. PETROLEUM NAPTHA
b.

15. Special Handling Instructions and Additional Information
SEAL NUMBER: 02644 TRAILER NUMBER: 76270

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations.
If I am a large quantity generator, I certify that I have program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Mo.	Day	Year
ROBERT TACKABERRY	Robert Tackaberry	1	0	5 8 7

TRANSPORTER

17. Transporter 1 (Acknowledgement of Receipt of Materials)

Printed/Typed Name	Signature	Mo.	Day	Year
DENNIS GUELFI	Dennis M Guelf.	1	0	5 8 7

18. Transporter 2 (Acknowledgement of Receipt of Materials)

Printed/Typed Name	Signature	Mo.	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	Mo.	Day	Year
KEEFE KEIFFER	Keefe Keiffer	1	1	1 8 7

EPA Form 8700-22 (Rev. 9-86) Previous edition is obsolete. COPY 3—Generator—mailed by TSD facility

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.

NY A 610339 5

ADVANCED
ENVIRONMENTAL SERVICES INC.

SAMPLING AND ANALYSIS FOR CLOSURE CERTIFICATION
STORAGE FACILITY NUMBER NYD 002113322

THREE AREAS

BUILDING 27A - SAMPLED 10/14/87

OUTSIDE BUILDING 1A - SAMPLED 11/6/87

BUILDING 2 - SAMPLED 11/20/87

Report Prepared For

PRATT & LAMBERT

W. Joseph McDougall, Ph.D.
Technical Evaluation

November 27, 1987
AES Report CMN

COMMITMENT
TO
HONESTY - QUALITY - SERVICE

ADVANCED
ENVIRONMENTAL SERVICES INC.

SAMPLING AND ANALYSIS FOR CLOSURE CERTIFICATION
STORAGE FACILITY NUMBER NYD 002113322

BUILDING 27A

Report Prepared For

PRATT & LAMBERT

W. Joseph McDougall, Ph.D.
Technical Evaluation

November 27, 1987
AES Report CMN

COMMITMENT
TO
HONESTY - QUALITY - SERVICE

SCOPE OF WORK

This work was initiated by Mr. Michael Balent and approved by Mr. John MacLaughlan, Plant Manager. The results are a component of the closure document; a total of three (3) areas will be sampled and analyzed.

This report contains the results of the first area - Building 27A. All three (3) areas will be collected by the identical method.

The area will be divided into four (4) equal quadrants. One square meter will be wiped thoroughly with Whatman 12.5 cm diameter No. 42 ashless filter paper. A field blank will be provided on each sampling day. Field Reports and Chain of Custody Records will be provided with each sample collection date.

ADVANCED ENVIRONMENTAL SERVICES, INC.
LABORATORY REPORT

Type of Analysis: RESULTS - WET CHEMISTRY

Client: PRATT & LAMBERT A.E.S. Job Code CMN

(All results are mg)

Analytical Parameter(s)	Method No.	Ref No.	Quant. Limits	AES Lab No. -	15560	15561	15562
				Sample ID -	S-1 WIPE	S-2 WIPE	S-3 WIPE
				Sample Date-	10/14/87	10/14/87	10/14/87
Hexavalent Chromium	7196	5	0.01		BQL*	BQL	BQL

Verbal results were given on 10/21/87.

* Below quantifiable limits.

Comment: All samples appeared turbid.

Margaret L. Skowron

Margaret L. Skowron
Wet Chemistry Supervisor

ADVANCED ENVIRONMENTAL SERVICES, INC.
LABORATORY REPORT

Type of Analysis: RESULTS - WET CHEMISTRY

Client: PRATT & LAMBERT A.E.S. Job Code CMN

(All results are mg)

Analytical Parameter(s)	Method No.	Ref No.	Quant. Limits	AES Lab No. -	15563	15564
				Sample ID -	S-4 WIPE	BLANK WIPE
				Sample Date-	10/14/87	10/14/87
Hexavalent Chromium	7196	5	0.01		BQL*	BQL

* Below quantifiable limits.

Margaret L. Skowron
Margaret L. Skowron
Wet Chemistry Supervisor

ADVANCED ENVIRONMENTAL SERVICES, INC.
PARAMETER TRACEABILITY REPORT
WET CHEMISTRY DEPARTMENT

AES JOB CODE CMN

ANALYST	ANALYTICAL METHOD	SAMPLE CODE	DATE OF ANALYSIS	TIME OF ANALYSIS
[illegible]	712a	15830-64	[illegible]/21/87	1030-1130 hrs

ADVANCED ENVIRONMENTAL SERVICES, INC.
LABORATORY REPORT

Type of Analysis: METALS

Client: PRATT & LAMBERT A.E.S. Job Code CMN

(All results are mg)

Analytical Parameter(s)	Method No.	Ref No.	Quant. Limits	AES Lab No. -	15560	15561	15562
				Sample ID -	S-1 WIPE	S-2 WIPE	S-3 WIPE
				Sample Date-	10/14/87	10/14/87	10/14/87
Total Lead (Pb)	7421	3	0.0005		BQL*	BQL	BQL

* Below quantifiable limits.

Janette Bingert
Atomic Spectroscopy Supervisor

ADVANCED ENVIRONMENTAL SERVICES, INC.
LABORATORY REPORT

Type of Analysis: METALS

Client: PRATT & LAMBERT A.E.S. Job Code CMN

(All results are in mg)

Analytical Parameter(s)	Method No.	Ref No.	Quant. Limits	AES Lab No. -	15563	15564
				Sample ID -	S-4 WIPE	BLANK WIPE
				Sample Date-	10/14/87	10/14/87
Total Lead (Pb)	7421	3	0.0005		BQL*	BQL

* Below quantifiable limits.

Janette Bingert
Atomic Spectroscopy Supervisor

ADVANCED ENVIRONMENTAL SERVICES, INC.
PARAMETER TRACEABILITY REPORT
ATOMIC SPECTROSCOPY DEPARTMENT

AES JOB CODE CMM

ANALYST	ANALYTICAL METHOD	SAMPLE CODE	DATE OF ANALYSIS	TIME OF ANALYSIS
L. McMahon	7195	15560-64	10-19-87	1500
F. Scurano	7420	15560-64	10-19-87	1800

CHAIN OF CUSTODY RECORD

PROJECT NO.: CMN

PROJECT NAME: Pratt & Lambert

ADVANCED ENVIRONMENTAL SERVICES INC.

SAMPLER'S SIGNATURE: Scott Abel

SAMPLE NO.	SEQ. NO.	DATE	TIME	SAMPLE LOCATION	SAMPLE TYPE	NUMBER OF CONTAINERS	REMARKS
	1	10-14-87	3 15 pm	S1	filter paper	1	
	2	"	"	S2	"	1	
	3	"	"	S3	"	1	
	4	"	"	S4	"	1	
	5	"	"	Blank	"	1	
					TOTAL NO. OF CONTAINERS	5	

RELINQUISHED BY (Sign)	DATE/TIME	RECEIVED BY (Sign)	RELINQUISHED BY (Sign)	DATE/TIME	RECEIVED BY (Sign)
1 Scott Abel	10-15-87 9:15 A.M.	2 Judy Ostrowski	2		3
RELINQUISHED BY (Sign)	DATE/TIME	REC'D BY MOBILE LAB (Sign)	REL'D BY MOBILE LAB (Sign)	DATE/TIME	RECEIVED BY (Sign)
3		4	4		5
METHOD OF SHIPMENT		SHIPPED BY (Sign)	RECEIVED FOR LABORATORY (Sign)		DATE/TIME

ADVANCED ENVIRONMENTAL SERVICES

FIELD REPORT

CUSTOMER: Pratt & Lambert AES JOB CODE: CMN

NUMBER OF SAMPLES: 5 BEGINNING DATE: 10-14-87

ENDING DATE: 10-14-87

SAMPLING LOCATIONS: Southeast corner, Bldg: 27A

TIME: 3:15 pm : _____

WEATHER: Sunny 55°F

SAMPLE VOLUME: 4 - filter wipe sample's, 1 blank

SAMPLE APPEARANCE: floor residue, dirt, dust

PARAMETERS	DATE	FLOW COMP	TIME COMP	GRAB COMP	GRAB	FIELD RESULTS
Hex chrome	10-14-87				X	
Lead	"				X	

COMMENTS

FINAL INTEGRATOR READING: N.A. DATE: _____ TIME: _____

INITIAL INTEGRATOR READING: _____ DATE: _____ TIME: _____

DIFFERENCE: _____

24 HOUR ADJUSTED: _____

Scott Abel 10-14-87

DATE

ADVANCED
ENVIRONMENTAL SERVICES INC.

SAMPLING AND ANALYSIS FOR CLOSURE CERTIFICATION
STORAGE FACILITY NUMBER NYD 002113322

OUTSIDE BUILDING 1A

Report Prepared For

PRATT & LAMBERT

W. Joseph McDougall, Ph.D.
Technical Evaluation

November 27, 1987
AES Report CMN

COMMITMENT
TO
HONESTY - QUALITY - SERVICE

SCOPE OF WORK

This work was initiated by Mr. Michael Balent and approved by Mr. John MacLaughlan, Plant Manager. The results are a component of the closure document; a total of three (3) areas will have been sampled and analyzed.

This report contains the results of the second area - Outside Building 1A. All three areas will have been collected by the identical method.

The area was divided into four (4) equal quadrants. One square meter was wiped thoroughly with Whatman 12.5 cm diameter No. 42 ashless filter paper. A field blank was provided. Field Report and Chain of Custody Record is provided in Appendix A.

COMMENT

Lead was found in the blank wipe at 0.17 mg.

Possible sources of contamination in the field or in the Laboratory seem unlikely.

A subsequent analysis of five blank wipes resulted in Lead being measured at 0.0005 mg in two of them.

ADVANCED ENVIRONMENTAL SERVICES, INC.
LABORATORY REPORT

Type of Analysis: RESULTS - WET CHEMISTRY

Client: PRATT & LAMBERT A.E.S. Job Code CMN

Analytical Parameter(s)	Method No.	Ref No.	Quant. Limits		AES Lab No. -	15984	15985	15986
					Sample ID -	A	B	C
						WIPE	WIPE	WIPE
					Sample Date-	11/5/87	11/5/87	11/5/87
Hexavalent Chromium (mg)*	7196	5	0.01			BQL**	BQL	BQL

* All samples appeared turbid.
** Below quantifiable limits.

Margaret L. Skowron
Margaret L. Skowron
Wet Chemistry Supervisor

ADVANCED ENVIRONMENTAL SERVICES, INC.
LABORATORY REPORT

Type of Analysis: RESULTS - WET CHEMISTRY

Client: PRATT & LAMBERT A.E.S. Job Code CMN

Analytical Parameter(s)	Method No.	Ref No.	Quant. Limits	AES Lab No. -	15987	15988
				Sample ID -	D	BLANK
					WIPE	WIPE
				Sample Date-	11/5/87	11/5/87
Hexavalent Chromium (mg) *	7196	5	0.01		BQL**	BQL

* All samplesappeared turbid.
** Below quantifiable limits.

Margaret L. Skowron
Wet Chemistry Supervisor

ADVANCED ENVIRONMENTAL SERVICES, INC.
PARAMETER TRACEABILITY REPORT
WET CHEMISTRY DEPARTMENT

AES JOB CODE CMV

ANALYST	ANALYTICAL METHOD	SAMPLE CODE	DATE OF ANALYSIS	TIME OF ANALYSIS
M. Skowron	7196	15484-88	11/10/87	1500 hrs

ADVANCED ENVIRONMENTAL SERVICES, INC.
LABORATORY REPORT

Type of Analysis: METALS

Client: PRATT & LAMBERT A.E.S. Job Code CMN

(All results are in mg)

Analytical Parameter(s)	Method No.	Ref No.	Quant. Limits	AES Lab No. -	15984	15985	15986
				Sample ID -	A WIPE	B WIPE	C WIPE
				Sample Date-	11/5/87	11/5/87	11/5/87
Total Lead (Pb)	7421	3	0.0005		0.40	0.36	0.25

Janette Bingert
Janette Bingert
Atomic Spectroscopy Supervisor

ADVANCED ENVIRONMENTAL SERVICES, INC.
LABORATORY REPORT

Type of Analysis: METALS

Client: PRATT & LAMBERT A.E.S. Job Code CMN

(All results are in mg)

Analytical Parameter(s)	Method No.	Ref No.	Quant. Limits	AES Lab No. -	15987	15988
				Sample ID -	D	BLANK
					WIPE	WIPE
				Sample Date-	11/5/87	11/5/87
Total Lead (Pb)	7421	3	0.0005		0.24	0.17

Janette Bingert
Janette Bingert
Atomic Spectroscopy Supervisor

ADVANCED ENVIRONMENTAL SERVICES, INC.
PARAMETER TRACEABILITY REPORT
ATOMIC SPECTROSCOPY DEPARTMENT

AES JOB CODE CMA1

ANALYST	ANALYTICAL METHOD	SAMPLE CODE	DATE OF ANALYSIS	TIME OF ANALYSIS
P. McMahon	7421	15554-88	11-10-87	1600

APPENDIX A

CHAIN OF CUSTODY RECORDS

CHAIN OF CUSTODY RECORD

PROJECT NO. CMN

PROJECT NAME Pratt & Lambert

ADVANCED ENVIRONMENTAL SERVICES INC.

SAMPLER'S SIGNATURE [signature]

SAMPLE NO.	SEQ. NO.	DATE	TIME	SAMPLE LOCATION	SAMPLE TYPE	NUMBER OF CONTAINERS	REMARKS
		11-5-87		A	Filter wipe	1	
		〃		B	〃	1	
		〃		C	〃	1	
		〃		D	〃	1	
		〃		Field Blank	〃	1	
					TOTAL NO. OF CONTAINERS	5	

RELINQUISHED BY (Sign)	DATE/TIME	RECEIVED BY (Sign)	RELINQUISHED BY (Sign)	DATE/TIME	RECEIVED BY (Sign)
1 [signature]	11-5-87 5:50 pm	2 [signature]	2		3
RELINQUISHED BY (Sign)	DATE/TIME	REC'D BY MOBILE LAB (Sign)	REL'D BY MOBILE LAB (Sign)	DATE/TIME	RECEIVED BY (Sign)
3		4	4		5
METHOD OF SHIPMENT		SHIPPED BY (Sign)	RECEIVED FOR LABORATORY (Sign)		DATE/TIME

APPENDIX B

FIELD REPORT

ADVANCED ENVIRONMENTAL SYSTEMS

FIELD REPORT

CUSTOMER: Pratt & Lambert

AES JOB CODE: CMN

NUMBER OF SAMPLES: 5

BEGINNING DATE: 11-5-87

ENDING DATE: 11-5-87

SAMPLING LOCATIONS: OUTSIDE BUILDING 1A

TIME: 9:50 AM

WEATHER: Cool, Clear

SAMPLE VOLUME: Wipe Samples of 1'm From 4 Quadrants

SAMPLE APPEARANCE: Dirty

PARAMETERS	DATE	FLOW COMP	TIME COMP	GRAB COMP	WIPE ~~GRAB~~	FIELD RESUL
Hex Chrome	11-5-87				X	
Lead	11-5-87				X	

COMMENTS

FINAL INTEGRATOR READING: _____ DATE: _____ TIME: _____

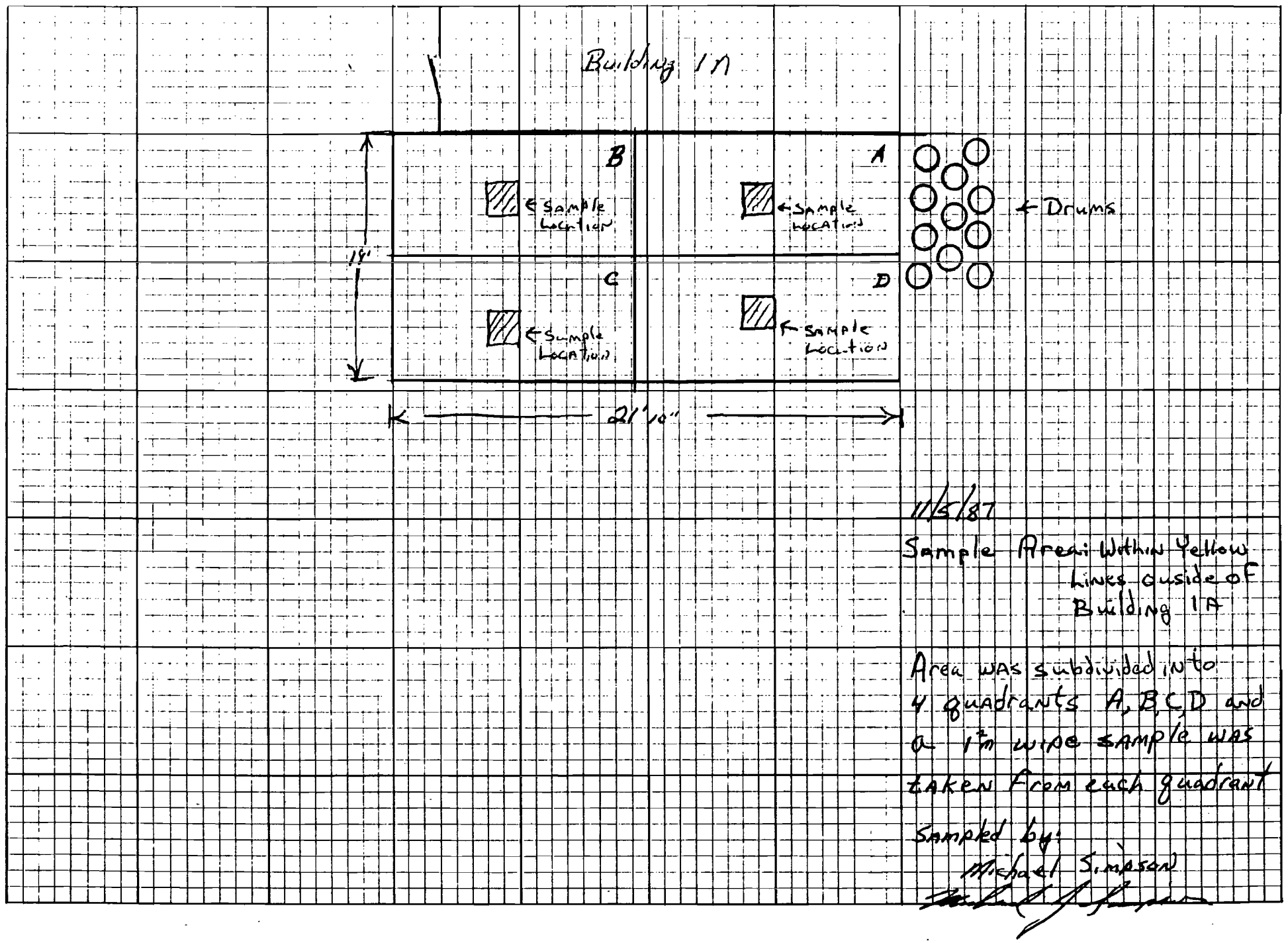
INITIAL INTEGRATOR READING: _____ DATE: _____ TIME: _____

DIFFERENCE: _____

24 HOUR ADJUSTED: _____

Michael J. Simpson 11/5/

DA



CITATEL 22-126 · CROSS SECTION · 8 SQUARES TO INCH

ANALYTICAL METHODOLOGIES

The method numbers for each procedure are listed in the second column of the tabulated results. The source for each method is listed as a reference number in the third column. The source(s) for the Analytical Methodologies are:

1 - EPA 40 CFR Part 136,"Guidelines Establishing Test Procedures for the Analysis of Pollutants Under the Clean Water Act; Final Rule and Interim Final Rule and Proposed Rule", Federal Register 49 (209), October 26, 1984.

2 - EPA 600/4-80-022, "Guidelines Establishing Test Procedures for the Analysis of Pollutants; Proposed Regulations, Correction", Federal Register 44 (244), December 18, 1979.

3 - EPA 600/4-79-020, "Methods for Chemical Analysis of Water and Wastes", (1983).

4 - EPA 600/4-79-057, "Methods for Organic Chemical Analysis of Municipal and Industrial Wastewater", (1982).

5 - EPA-SW-846, "Test Methods for Evaluating Solid Waste, Physical/ Chemical Methods", second edition (1982).

6 - Standard Methods for the Examination of Water and Wastewater", 16th edition, (1985).

7 - New York State Institute of Toxicology Analytical Handbook, October 1982 , Updated March, 1986.

8 - NIOSH Manual of Analytical Methods, second edition 1977.

9 - "The Analysis of Polychlorinated Biphenyls in Transformer Fluid and Waste Oil", EPA Environmental Monitoring and Support Laboratory draft, June 24, 1980.

10 - "Approved Analytical Procedures for Determining the Content of Constituents Banned from Landburial" (New York State DEC, Division of Solid and Hazardous Waste), January 1985.

11 - EPA 600/4-81-055, "Interim Methods for the Sampling and Analysis of Priority Pollutants in Sediments and Fish Tissue", Revised January 7, 1983.

12 - "Determination of Formaldehyde in the Atmosphere", Environmental Health Center, Division of Laboratories and Research, NYS Department of Health APC-29.

13 - "Chemical Soil Tests", Cornell University Agricultural Experiment Station, NYS College of Agricultural, Ithaca, N.Y. Bulletin 960, Revised October 1965.

14 - "Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter", American Society for Testing and Materials, Philadelphia, Pa., Designation: D 240-64 (Reapproved 1973).

15 - "Analyzing Trace Amounts of Solvents in Water" (Supelco Bulletin 816).

16 - "Determination of Aniline and Substituted Derivatives in Wastewater by Gas and Liquid Chromatography", (Analytical Chemistry, Vol. 55, No. 12, October 1983).

ADVANCED
ENVIRONMENTAL SERVICES INC.

SAMPLING AND ANALYSIS FOR CLOSURE CERTIFICATION
STORAGE FACILITY NUMBER NYD 002113322

BUILDING 2

Report Prepared For

PRATT & LAMBERT

W. Joseph McDougall, Ph.D.
Technical Evaluation

November 27, 1987
AES Report CMN

COMMITMENT
TO
HONESTY - QUALITY - SERVICE

SCOPE OF WORK

This work was initiated by Mr. Michael Balent and approved by Mr. John MacLaughlan, Plant Manager. The results are a component of the closure document; a total of three (3) areas have been sampled and analyzed.

This report contains the results of the third area - Building 2. All three areas have been collected by the identical method.

At the request of Mr. Balent, the area was divided into five (5) equal sections. One square meter per section was wiped thoroughly with Whatman 12.5 cm diameter No. 42 ashless filter paper. A field blank was provided.

Also, since 0.17 mg of lead was found in the field blank from the previous wipe testing, five (5) lab blank filter paper controls were provided to find out if the filter paper itself contains low concentrations of lead.

The field report and Chain of Custody record are provided in Appendix A.

ADVANCED ENVIRONMENTAL SERVICES, INC.
LABORATORY REPORT

Type of Analysis: RESULTS - WET CHEMISTRY

Client: PRATT & LAMBERT A.E.S. Job Code CMN

Analytical Parameter(s)	Method No.	Ref No.	Quant. Limits	AES Lab No. -	16351	16352	16353
				Sample ID -	A WIPE #1	B WIPE #2	C WIPE #3
				Sample Date-	11/20/87	11/20/87	11/20/87
Hexavalent Chromium (mg)	7196	5	0.01		BQL*	BQL	BQL

* Below quantifiable limits.

Margaret K. Skowron
Wet Chemistry Supervisor

ADVANCED ENVIRONMENTAL SERVICES, INC.
LABORATORY REPORT

Type of Analysis: RESULTS - WET CHEMISTRY

Client: PRATT & LAMBERT A.E.S. Job Code CMN

Analytical Parameter(s)	Method No.	Ref No.	Quant. Limits	AES Lab No. -	16354	16355	16356
				Sample ID -	D WIPE #4	E WIPE #5	FIELD BLANK WIPE
				Sample Date-	11/20/87	11/20/87	11/20/87
Hexavalent Chromium (mg)	7196	5	0.01		BQL*	BQL	BQL

* Below quantifiable limits.

Margaret L. Skowron
Wet Chemistry Supervisor

ADVANCED ENVIRONMENTAL SERVICES, INC.
PARAMETER TRACEABILITY REPORT
WET CHEMISTRY DEPARTMENT

AES JOB CODE CMN

ANALYST	ANALYTICAL METHOD	SAMPLE CODE	DATE OF ANALYSIS	TIME OF ANALYSIS
M. Skowron	7196	16351-61	11/25/87	1600 hrs

ADVANCED ENVIRONMENTAL SERVICES, INC.
LABORATORY REPORT

Type of Analysis: RESULTS - WET CHEMISTRY

Client: PRATT & LAMBERT A.E.S. Job Code CMN

Analytical Parameter(s)	Method No.	Ref No.	Quant. Limits	AES Lab No. -	16357	16358	16359
				Sample ID -	CONTROLS #1 FILTER PAPER LAB BLANK	CONTROLS #2 FILTER PAPER LAB BLANK	CONTROLS #3 FILTER PAPER LAB BLANK
				Sample Date-			
Hexavalent Chromium (mg)	7196	5	0.01		BQL*	BQL	BQL

* Below quantifiable limits.

Margaret D. Skowron
Wet Chemistry Supervisor

ADVANCED ENVIRONMENTAL SERVICES, INC.
LABORATORY REPORT

Type of Analysis: RESULTS - WET CHEMISTRY

Client: PRATT & LAMBERT A.E.S. Job Code CMN

Analytical Parameter(s)	Method No.	Ref No.	Quant. Limits	AES Lab No. -	16360	16361
				Sample ID -	CONTROLS #4 FILTER PAPER LAB BLANK	CONTROLS #5 FILTER PAPER LAB BLANK
				Sample Date-		
Hexavalent Chromium (mg)	7196	5	0.01		BQL*	BQL

* Below quantifiable limits.

Michael J. Simpson For
Margaret L. Skowron
Wet Chemistry Supervisor

ADVANCED ENVIRONMENTAL SERVICES, INC.
PARAMETER TRACEABILITY REPORT
WET CHEMISTRY DEPARTMENT

AES JOB CODE CMN

ANALYST	ANALYTICAL METHOD	SAMPLE CODE	DATE OF ANALYSIS	TIME OF ANALYSIS
M. Skowron	7196	16351-61	11/25/87	1600 hrs

ADVANCED ENVIRONMENTAL SERVICES, INC.
LABORATORY REPORT

Type of Analysis: METALS

Client: PRATT & LAMBERT A.E.S. Job Code CMN

(All results are in mg)

Analytical Parameter(s)	Method No.	Ref No.	Quant. Limits	AES Lab No. -	16351	16352	16353
				Sample ID -	A #1 WIPE	B #2 WIPE	C #3 WIPE
				Sample Date-	11/20/87	11/20/87	11/20/87
Total Lead (Pb)	7421	3	0.0005		0.017	0.012	0.0085

Janette Bingert
Janette Bingert
Atomic Spectroscopy Supervisor

ADVANCED ENVIRONMENTAL SERVICES, INC.
LABORATORY REPORT

Type of Analysis: METALS

Client: PRATT & LAMBERT A.E.S. Job Code CMN

(All results are in mg)

Analytical Parameter(s)	Method No.	Ref No.	Quant. Limits	AES Lab No. -	16354	16355	16356
				Sample ID -	D	E	FIELD BLANK
				Sample Date-	#4 WIPE 11/20/87	#5 WIPE 11/20/87	WIPE 11/20/87
Total Lead (Pb)	7421	3	0.0005		0.0075	0.0085	0.0005

Janette Bingert

Janette Bingert
Atomic Spectroscopy Supervisor

ADVANCED ENVIRONMENTAL SERVICES, INC.
LABORATORY REPORT

Type of Analysis: METALS

Client: PRATT & LAMBERT A.E.S. Job Code CMN

(All results are in mg)

Analytical Parameter(s)	Method No.	Ref No.	Quant. Limits	Sample Date-	AES Lab No. - 16357 Sample ID - LAB BLANK FILTER PAPER #1	16358 LAB BLANK FILTER PAPER #2	16359 LAB BLANK FILTER PAPER #3
Total Lead (Pb)	7421	3	0.0005		0.0005	0.0006	BQL*

* Below quantifiable limits.

Janette Bingert
Atomic Spectroscopy Supervisor

ADVANCED ENVIRONMENTAL SERVICES, INC.
LABORATORY REPORT

Type of Analysis: METALS

Client: PRATT & LAMBERT A.E.S. Job Code CMN

(All results are in mg)

Analytical Parameter(s)	Method No.	Ref No.	Quant. Limits	AES Lab No. -	16360	16361
				Sample ID -	LAB BLANK FILTER PAPER #4	LAB BLANK FILTER PAPER #5
				Sample Date-		
Total Lead (Pb)	7421	3	0.0005		BQL*	BQL

* Below quantifiable limits.

Janette Bingert
Janette Bingert
Atomic Spectroscopy Supervisor

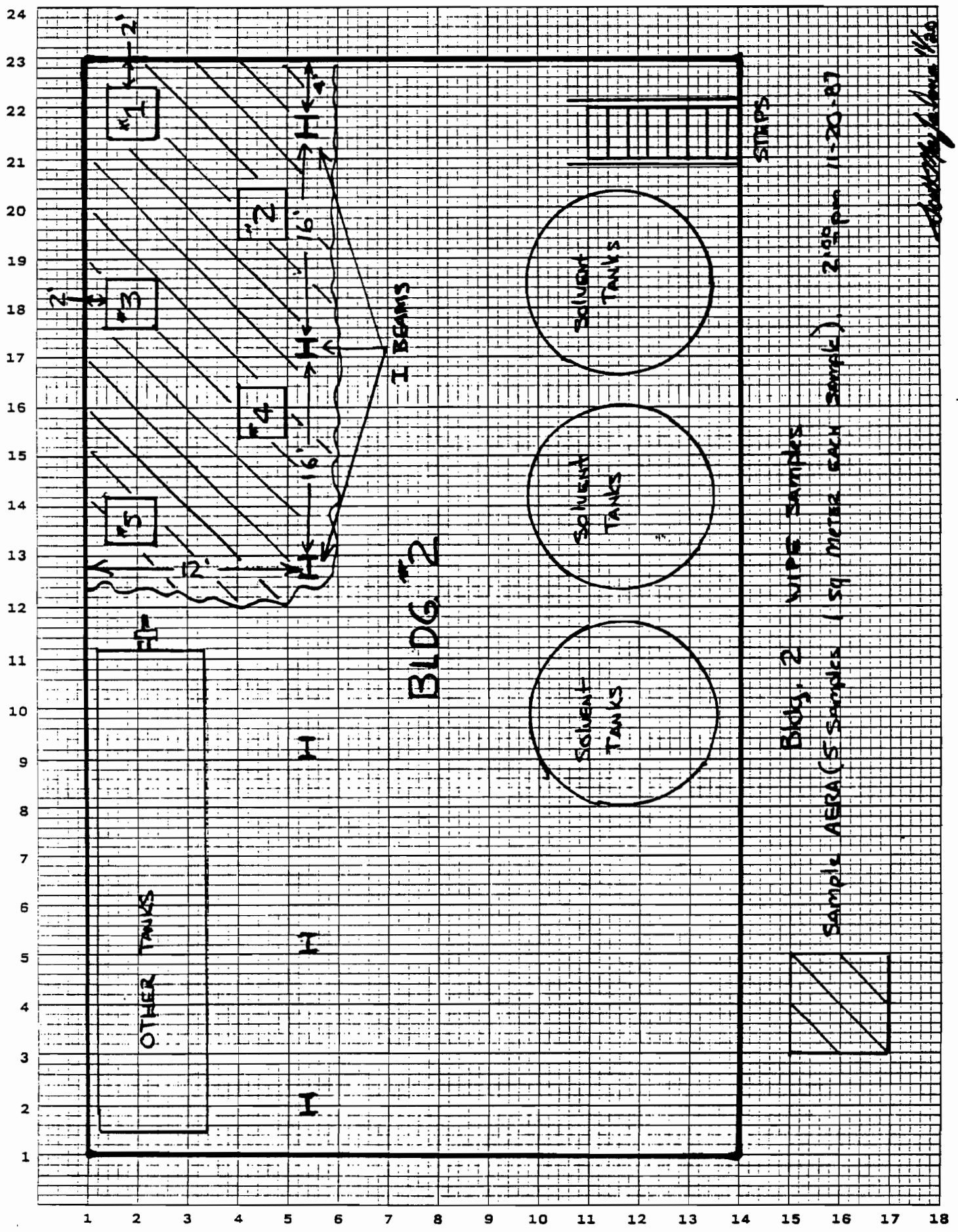
ADVANCED ENVIRONMENTAL SERVICES, INC.
PARAMETER TRACEABILITY REPORT
ATOMIC SPECTROSCOPY DEPARTMENT

AES JOB CODE CMN

ANALYST	ANALYTICAL METHOD	SAMPLE CODE	DATE OF ANALYSIS	TIME OF ANALYSIS
E. McMahon	7421	16351-61	11-23-87	1700

APPENDIX A

CHAIN OF CUSTODY RECORD
AND
FIELD REPORT



ADVANCED ENVIRONMENTAL SERVICES, INC.

FIELD REPORT

CUSTOMER: Pratt-Lambert AES JOB CODE: CMN

WEATHER: 32°F light snow BEGINNING DATE: 11-20-87

NUMBER OF SAMPLES: 2 ENDING DATE: 11-20-87

SAMPLING LOCATIONS (1) Bldg #2 (2) Field Trip Blank (3) _____

TIME 2:00 pm ——— _____

SAMPLING VOLUME 5-250ml wipes 1-wipe _____

SAMPLE APPEARANCE (1) white wipe w/ light dirt and dust from wipe

(2) 1-clean wipe

(3) _____

Parameters	Date	Preservative	Flow Comp.	Time Comp.	Grab Comp.	Grab
Metals	11-20-87	None				✓

FIELD PARAMETERS: pH (1) N/A (2) _____ (3) _____ F°C° Temp (1) _____ (2) _____ (3) _____

Dissolved Oxygen (1) N/A (2) _____ (3) _____ Rc12 (1) _____ (2) _____ (3) _____

Specific Conductivity (1) N/A (2) _____ (3) _____

COMMENTS: N/A

Scott Mylotine 11-20-87

Sampler(s) Date

CHAIN OF CUSTODY RECORD

PROJECT NO.	PROJECT NAME
CMN	Platt + Lambert

ADVANCED ENVIRONMENTAL SERVICES INC.

SAMPLER'S SIGNATURE: Scott Maytenborn

SAMPLE NO.	SEQ. NO.	DATE	TIME	SAMPLE LOCATION	SAMPLE TYPE	NUMBER OF CONTAINERS	REMARKS
	1	11-20-87	2:00 pm	Bldg #2	Wipe Samples	5	250ml wips
	—	11-20-87	—	field Trip BLANK	1 - Wipe	1	"
					TOTAL NO. OF CONTAINERS	6	

RELINQUISHED BY (Sign)	DATE/TIME	RECEIVED BY (Sign)	RELINQUISHED BY (Sign)	DATE/TIME	RECEIVED BY (Sign)
1 Scott Maytenborn	11-20-87 3:30 p.m.	2 Judy Petrowski	2		3
RELINQUISHED BY (Sign)	DATE/TIME	REC'D BY MOBILE LAB (Sign)	REL'D BY MOBILE LAB (Sign)	DATE/TIME	RECEIVED BY (Sign)
3		4	4		5
METHOD OF SHIPMENT		SHIPPED BY (Sign)	RECEIVED FOR LABORATORY (Sign)		DATE/TIME

ANALYTICAL METHODOLOGIES

The method numbers for each procedure are listed in the second column of the tabulated results. The source for each method is listed as a reference number in the third column. The source(s) for the Analytical Methodologies are:

1 - EPA 40 CFR Part 136,"Guidelines Establishing Test Procedures for the Analysis of Pollutants Under the Clean Water Act; Final Rule and Interim Final Rule and Proposed Rule", Federal Register 49 (209), October 26, 1984.

2 - EPA 600/4-80-022, "Guidelines Establishing Test Procedures for the Analysis of Pollutants; Proposed Regulations, Correction", Federal Register 44 (244), December 18, 1979.

3 - EPA 600/4-79-020, "Methods for Chemical Analysis of Water and Wastes", (1983).

4 - EPA 600/4-79-057, "Methods for Organic Chemical Analysis of Municipal and Industrial Wastewater", (1982).

5 - EPA-SW-846, "Test Methods for Evaluating Solid Waste, Physical/ Chemical Methods", second edition (1982).

6 - Standard Methods for the Examination of Water and Wastewater", 16th edition, (1985).

7 - New York State Institute of Toxicology Analytical Handbook, October 1982,Updated March, 1986.

8 - NIOSH Manual of Analytical Methods, second edition 1977.

9 - "The Analysis of Polychlorinated Biphenyls in Transformer Fluid and Waste Oil", EPA Environmental Monitoring and Support Laboratory draft, June 24, 1980.

10 - "Approved Analytical Procedures for Determining the Content of Constituents Banned from Landburial" (New York State DEC, Division of Solid and Hazardous Waste), January 1985.

11 - EPA 600/4-81-055, "Interim Methods for the Sampling and Analysis of Priority Pollutants in Sediments and Fish Tissue", Revised January 7, 1983.

12 - "Determination of Formaldehyde in the Atmosphere", Environmental Health Center, Division of Laboratories and Research, NYS Department of Health APC-29.

13 - "Chemical Soil Tests", Cornell University Agricultural Experiment Station, NYS College of Agricultural, Ithaca, N.Y. Bulletin 960, Revised October 1965.

14 - "Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter", American Society for Testing and Materials, Philadelphia, Pa., Designation: D 240-64 (Reapproved 1973).

15 - "Analyzing Trace Amounts of Solvents in Water" (Supelco Bulletin 816).

16 - "Determination of Aniline and Substituted Derivatives in Wastewater by Gas and Liquid Chromatography", (Analytical Chemistry, Vol. 55, No. 12, October 1983).

PRATT&LAMBERT
Paints/Chemical Coatings/Adhesives
75 TONAWANDA STREET/BUFFALO, N.Y.

November 21, 1986

Mr. Robert Kiddle
Bureau of Hazardous Waste Technology
Division of Solid and Hazardous Waste
New York State Department of Environmental Conservation
50 Wolfe Road
Albany, New York 12233-0001

Attention: George W. Heitzman

Attached are 3 copies of a Closure Plan requested by your division for the Buffalo Plant of Pratt & Lambert, Inc., located at 75 Tonawanda Street.

The Plan provides for decontamination and closure of three hazardous waste storage areas once technically operated under interim T.S.D.F. status. In fact, the facility never qualified for interim status, and therefor never operated with interim status.

Once decontaminated and certified closed, each storage area will be reopened for storage of hazardous waste under "Generator" status.

Please feel free to call if you require any additional information.

Yours truly,

PRATT & LAMBERT, INC.

E. G. LeVea

Eugene G. LeVea
Project Engineer

EGL:jh

Enc.

Copy: Mr. Robert Mitrey

PRATT&LAMBERT
Paints/Chemical Coatings/Adhesives
75 TONAWANDA STREET/BUFFALO, N.Y.

CLOSURE PLAN
FOR
HAZARDOUS WASTE STORAGE AREAS

PRATT & LAMBERT, INC.
BUFFALO, NEW YORK

GENERAL INFORMATION

Hazardous wastes generated during the manufacture of Trade Sales Paints and Industrial Coatings are accumulated in 55 gal. steel drums located in specific authorized "accumulation areas" throughout the plant. Drums located in these specified areas are marked with:

1. A Pratt & Lambert waste stream code designation
2. A departmental drum number sequenced for auditing capabilities
3. Appropriate hazardous waste labels.

Each drum is sealed and dated when filled. An internal waste manifest is then prepared and the drum is moved by operating personnel to designated storage areas where they remain until moved off-site for incineration. An inventory record is generated in the Plant Manager's office to audit aging of drums and guarantee timely disposal. On a predetermined schedule wastes are moved on a Pratt & Lambert permitted vehicle or other permitted carrier to a permitted and company approved disposal facility. All personnel involved in the handling of hazardous wastes receive annual training in procedures, requirements, and all potential hazards involved.

Attached are drawings of our Buffalo facility showing floor by floor locations of all our accumulating areas, and of our 3 hazardous waste storage areas. The accumulation points are indicated by a black dot. The hazardous waste storage areas are highlighted with hashmarks and for your benefit, circled in red.

The total area committed to the storage of Hazardous Waste is 1414 square feet:

Area A	Bldg 27A	450	SQ FT
Area B	Bldg 2	480	SQ FT
Area C	Outside Bldg 1A	484	SQ FT
	Total	1414	

Wastes generated at Buffalo fall into 5 basic categories. The five are:

1. Solvent Paint wastes and sludges.
2. Caustic Wash water
3. Caustic water sludge
4. Water/solvent mixtures
5. Wash solvent from the Industrial products plant

Attached are "Waste Product Surveys" originally generated for Ross Incineration, our primary hazardous waste disposal facility. These documents describe the waste streams and profile their physical and chemical characteristics.

Inventory records of hazardous waste on hand indicate a total of 151 drums presently held in the prescribed storage areas. Stringent restrictions recently instituted within the manufacturing area have markedly reduced daily generation to 2 drums. Spent solvent - generated from tank and equipment washing is now recycled into subsequent production. Drainings from straining media and containers damaged in production are also recycled. Caustic wash water is now reused until no longer effective. At our present rate of generation we will accumulate approximately 190 additional drums by our scheduled April 17, 1987 closing date. Continued shipments combined with reduced generation rates, should reduce inventory levels as we approach the date set for closure.

Since our hazardous wastes are so similar in character to materials normally handled within the facility there is no equipment specifically designated to the handling of our waste drums.

REMOVAL OF INVENTORY

Hazardous wastes stored within the facility will be removed on our regular schedule by a Pratt & Lambert permitted vehicle or other permitted transport service and delivered to one of three permitted incineration facilities.

Permitted hazardous waste carriers:

Pratt & Lambert, Inc.
E.P.A. ID#NYD002113322

Tonawanda Tank Transport Service
E.P.A. ID#NYD097644801

Buffalo Fuel Corp.
E.P.A. ID#NYD051809952

Permitted disposal sites:

Ross Incineration Services, Inc.
394 Giles Road
Grafton, Ohio 44044
E.P.A. ID#OHD048415665

Hukill Chemical Corporation
7013 Krick Road
Bedford, Ohio 44146
E.P.A. ID#OHD001926740

Systech Corporation
245 North Valley Road
Xenia, Ohio 45385-9354
E.P.A. ID#OHD005048947

All three facilities are within 375 road miles of our Buffalo Plant.

FACILITY DECONTAMINATION

All hazardous waste is stored at Buffalo in 55 gallon drums on a concrete pad or flooring. Because our records indicate no history of a spill in a storage area, and because the concrete work is intact we have experienced no contamination of surrounding or sub soil. Each storage area will be cleaned of any solid material that may have collected. The floor will then be washed with a detergent and water. Only the simplest of hand tools will be required. We plan to use: long handled scrapers, shovels, brooms, mops and buckets. Tools used during decontamination will be washed with the same detergent/water combination used on the floors. We will conduct a wipe test on the floor of each decontaminated area in a manner recommended by a local testing laboratory. Wipe samples will be tested by that local laboratory for the presence of lead, Hexavalent Chromium and organic solvents. The decontamination/testing cycle will be repeated, if necessary, until test results are judged acceptable. If our washing procedure proves to be inadequate for decontamination, we will be prepared to steam clean the area.

We anticipate generating approximately 300 gallons of material, primarily wash water, during decontamination. That material will be collected in 55 gallon drums and analyzed. The drums will be disposed of in a manner dictated by the test results.

To ensure continued legal operation of the plant, storage areas will be decontaminated and closed sequentially. Areas cleaned and certified closed will be returned to the storage of hazardous waste under "generator" status.

CLOSURE CERTIFICATION

Upon completion of closure activities, the closure will be certified, by both the owner of the facility and an independent registered professional engineer, that the facility has been closed in accordance with the in the approved closure plan. Because of the limited area involved, we anticipate the need for no more than 4 inspections by the certifying engineer.

CLOSURE SCHEDULE

January 2, 1987 - Receive closure plan approval from N.Y.S.D.E.C.

January 9, 1987 - Post public notice of closure

February 13, 1987 - Removal of hazardous waste drums from Building 27A storage area completed

February 27, 1987 - Decontamination of Building 27A storage area completed. Wipe sample taken and submitted to local testing laboratory

March 13, 1987 - Building 27A storage area certified closed

March 16, 1987 - Removal of hazardous waste drums from Building 2 and Building 1A storage areas completed

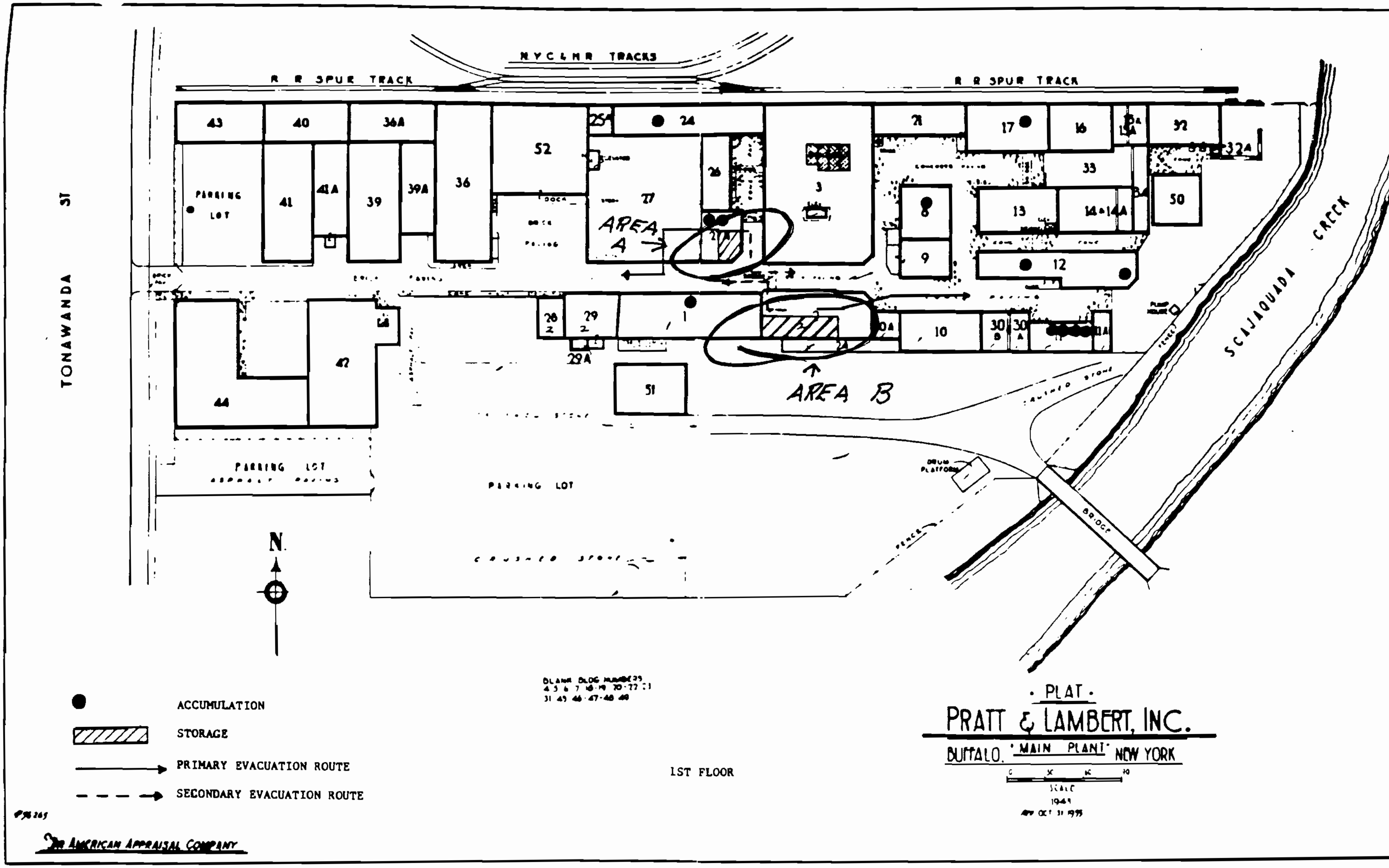
March 30 1987 - Decontamination of Building 2 and Building 1A storage areas completed. Wipe samples taken and submitted to local testing laboratory

April 17, 1987 - Building 2 and Building 1A storage areas certified closed

COST OF CLOSURE

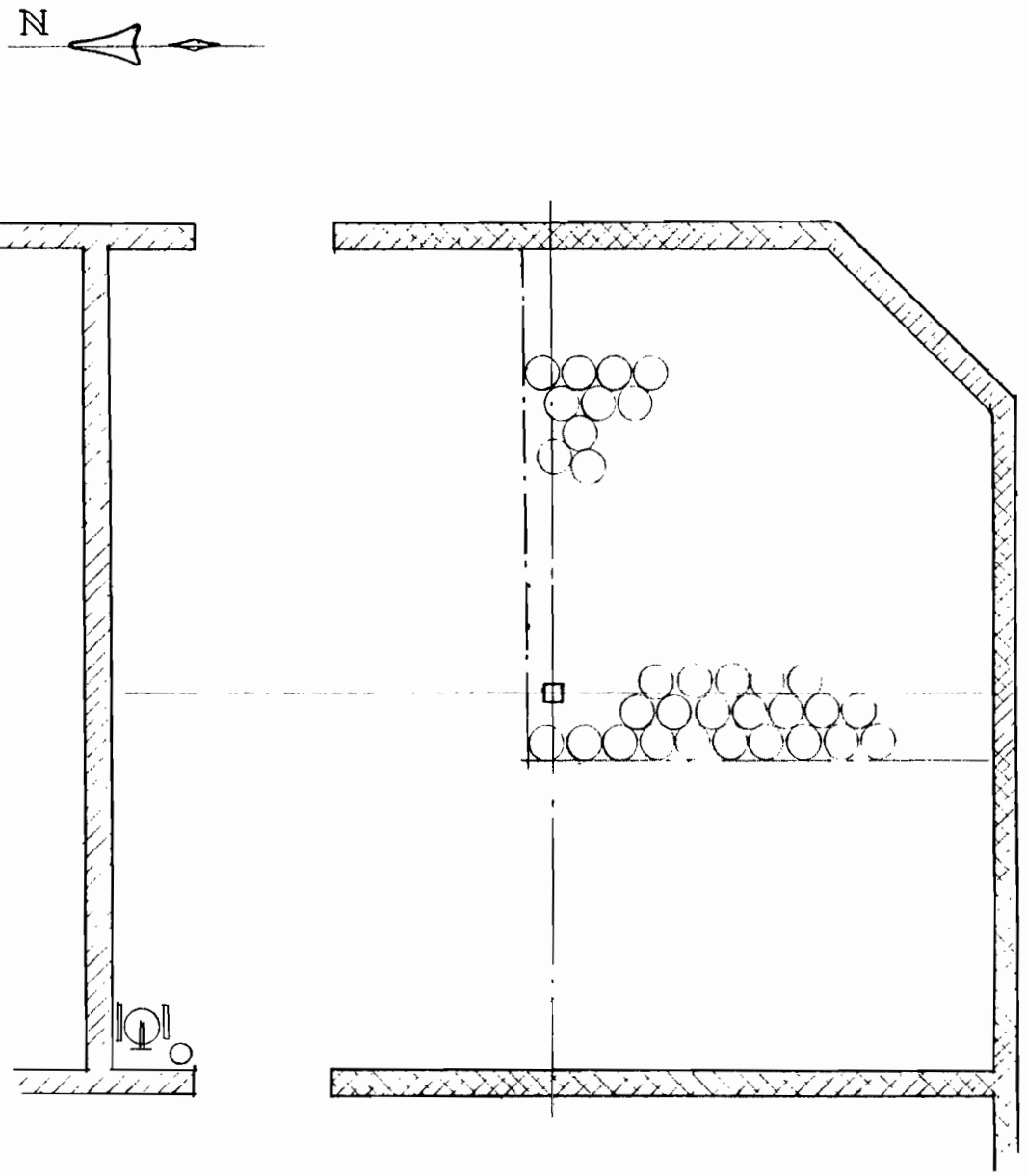
All internal closure operations will be performed by operating personnel. Our estimate of closure costs is:

Waste Disposal Costs	$ 37,500.
Internal Labor	$ 3,000.
Laboratory Testing	$ 1,000.
Cost of Closure Certification	$ 1,000.
Disposal of accumulated material resulting from Decontamination	$ 1,500.
Sub Total	$ 44,000.
Contingencies 20%	$ 8,800.
Administrative 15%	$ 6,600.
Total	$ 59,400.


N Y C & H R TRACKS
R R SPUR TRACK
R R SPUR TRACK
TONAWANDA ST
SCAJAQUADA CREEK
43
40
36A
41
41A
39
39A
36
52
25A
24
27
26
3
21
17
16
15A
32
32A
33
8
13
14 & 14A
50
9
12
28
29
29A
1
10A
10
30 B
30 A
44
42
51
AREA A
AREA B
PARKING LOT
PARKING LOT
PARKING LOT
CRUSHED STONE
BRIDGE
DRUM PLATFORM
N
ACCUMULATION
STORAGE
PRIMARY EVACUATION ROUTE
SECONDARY EVACUATION ROUTE
1ST FLOOR
· PLAT ·
PRATT & LAMBERT, INC.
BUFFALO. 'MAIN PLANT' NEW YORK
SCALE
1949
THE AMERICAN APPRAISAL COMPANY

BY GF DATE 11-21-86 SUBJECT BLDG 27 STORAGE AREA "A" SHEET NO. OF

CHKD. BY DATE JOB NO.

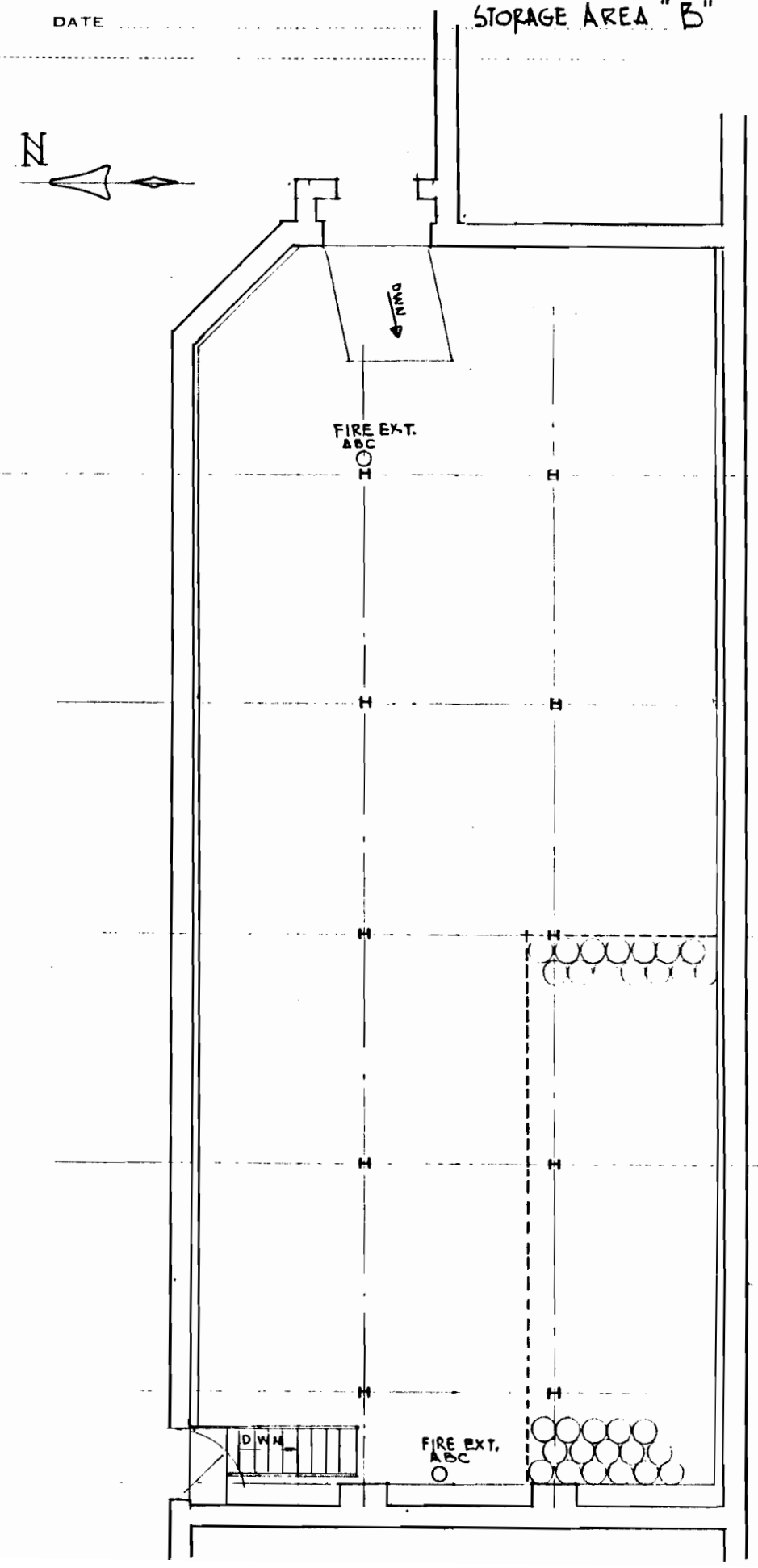


FLOOR PLAN

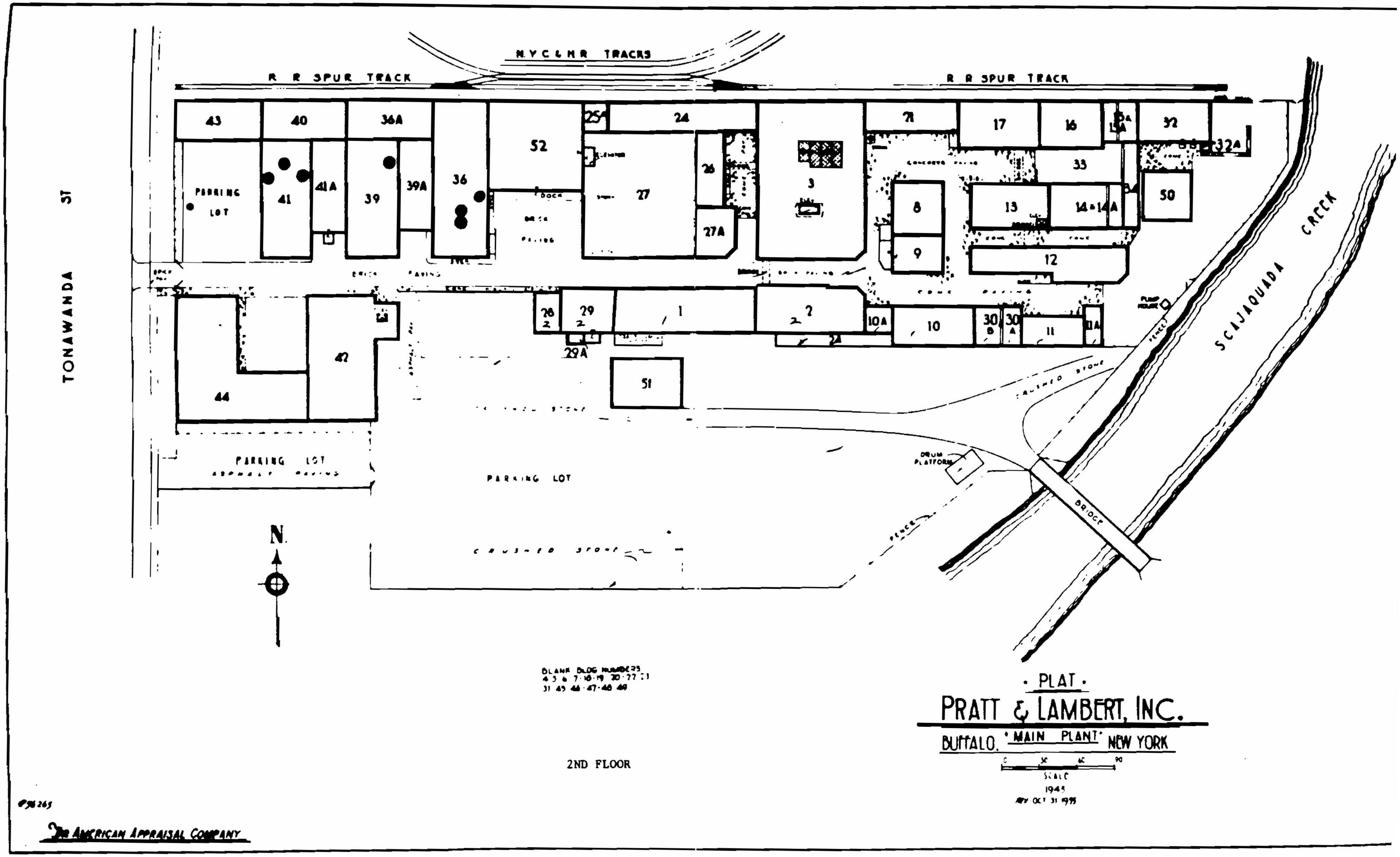
SCALE 1/8" = 1'-0"

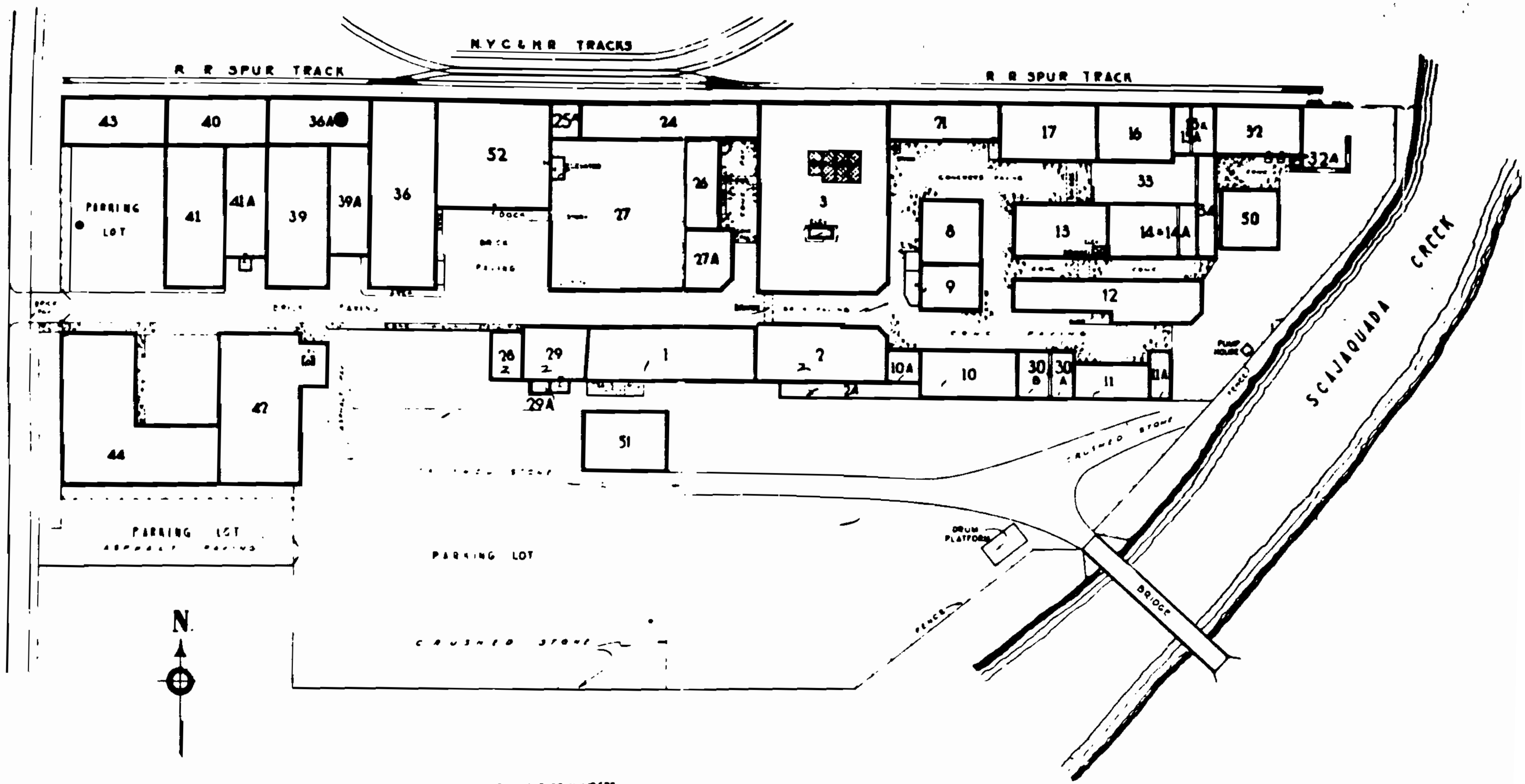
BY GF DATE 11-21-86 SUBJECT BLDG 2 STORAGE AREA "B" SHEET NO. ... OF ...

CHKD. BY ... DATE ... JOB NO. ...



FLOOR PLAN
SCALE 3/32" = 1'-0"


N Y C & H R TRACKS
R R SPUR TRACK
R R SPUR TRACK
TONAWANDA ST
SCAJAQUADA CREEK
BRIDGE
DRUM PLATFORM
PUMP HOUSE
PARKING LOT
PARKING LOT
ASPHALT PAVING
PARKING LOT
CRUSHED STONE
CRUSHED STONE
BRICK PAVING
CONCRETE PAVING
FENCE
N
BLANK BLDG NUMBERS
4 5 6 7 18 19 20 22 23
31 45 46 47 48 49
2ND FLOOR
· PLAT ·
PRATT & LAMBERT, INC.
BUFFALO, 'MAIN PLANT' NEW YORK
SCALE
1945
REV OCT 31 1955
The American Appraisal Company



BLANK BLDG NUMBERS
4 5 6 7 18-19 20-22 23
31 45 46-47-48 49

3RD FLOOR

• PLAT •

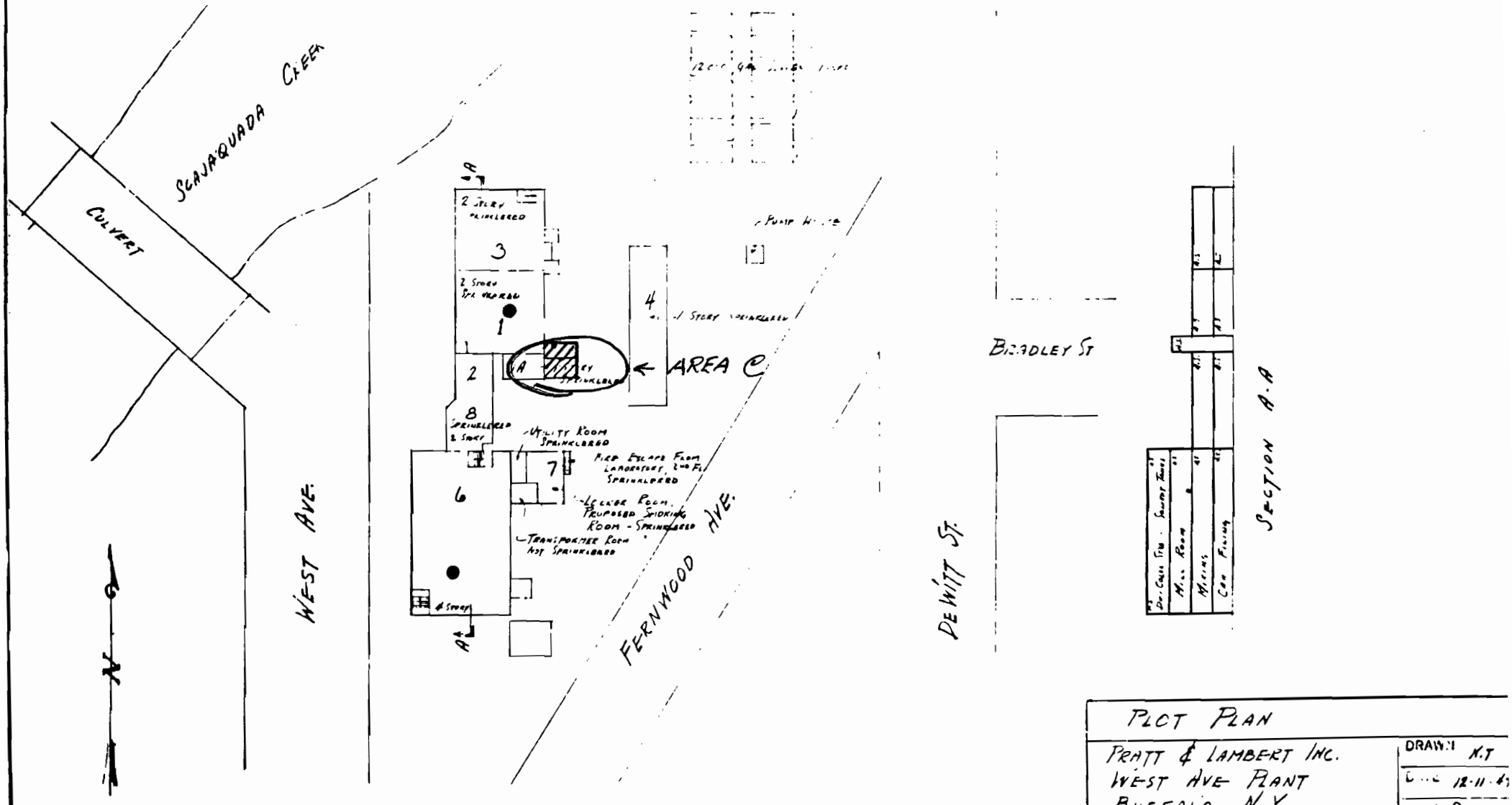
PRATT & LAMBERT, INC.

BUFFALO, 'MAIN PLANT' NEW YORK

SCALE
1945
REV OCT 31 1955

#56265

The American Appraisal Company



1ST FLOOR - LACQUER PLANT

SCALE - 1" = 50'-0"

PLOT PLAN

PRATT & LAMBERT INC.
WEST AVE PLANT
BUFFALO, N.Y.

DRAWN K.T

DATE 12-11-4

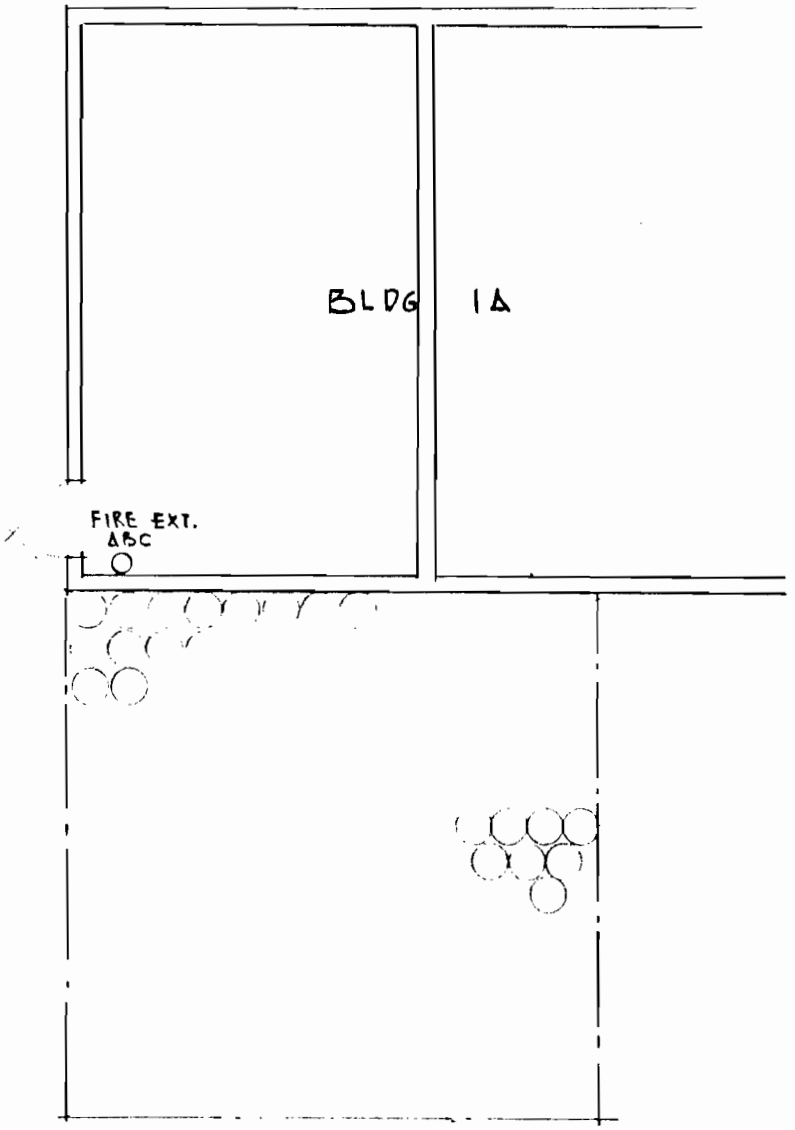
REVISED

JAMES N DeSERIO

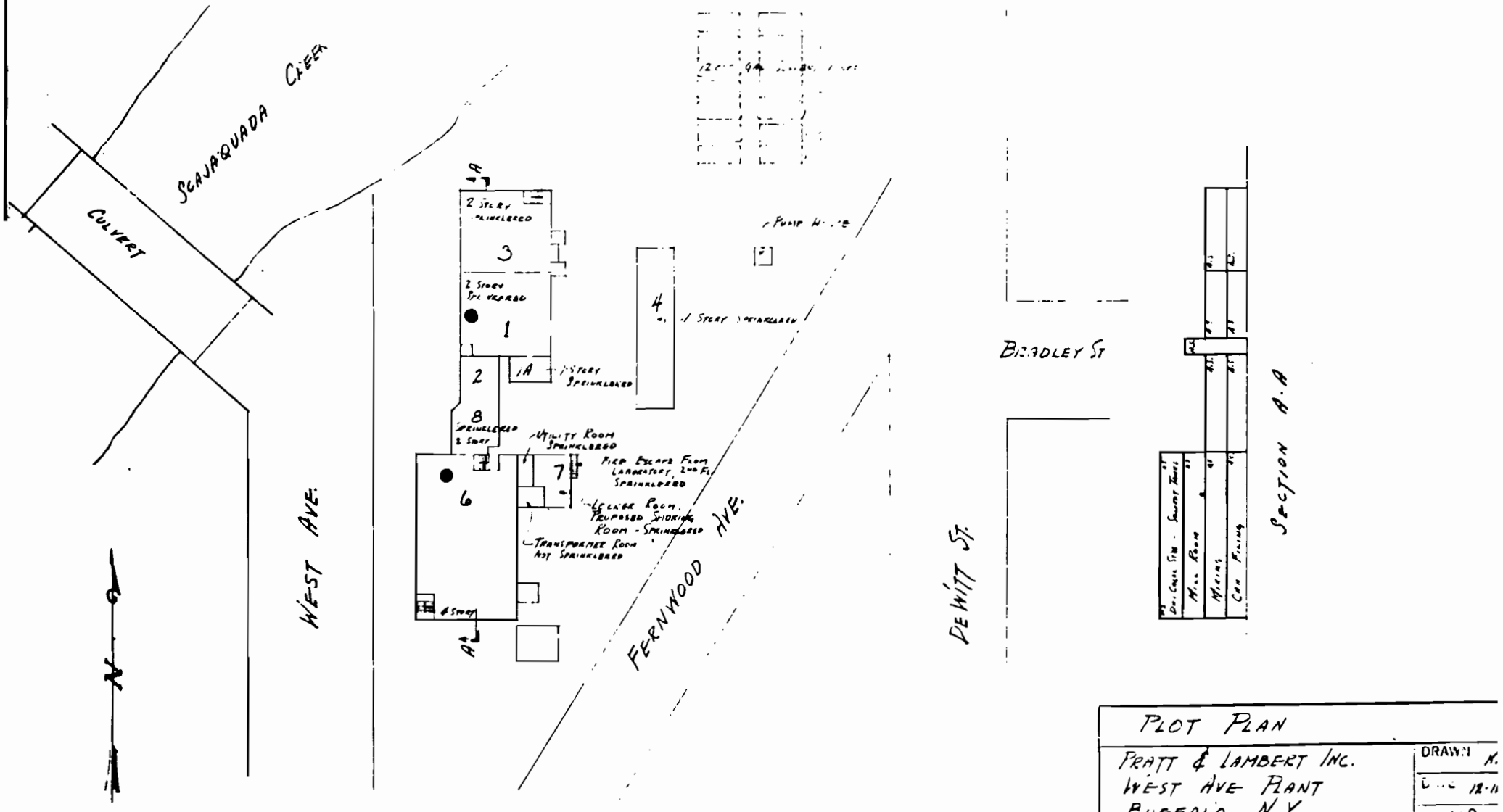
BY G.F DATE 11-21-86 SUBJECT BLDG 1A STORAGE AREA "C" SHEET NO OF

CHKD BY DATE JOB NO.

N



FLOOR PLAN



SECOND FLOOR - LACQUER PLANT

SCALE - 1" = 50'-0"

PLOT PLAN

PRATT & LAMBERT INC.
WEST AVE PLANT
BUFFALO, N.Y.

DRAWN N.

DATE 12-1

REVISED

JAMES N. DESERIO
CONSULTING ENGINEER

DRAWING N
20447 - 7

ROSS

Ross Incineration Services, Inc.
394 Giles Rd.
Grafton, OH 44044
PH. (216) 748-2171

WASTE PRODUCT SURVEY

1. # 21776 *

USEPA Facility ID# OHDO48415665

I. GENERATOR INFORMATION

2. Generator PRATT & LAMBERT, INC. 3. USEPA ID# NYD002113322

4. Mailing Address P.O. Box 22, Buffalo, New York 14240

5. Plant Address 75 Tonawanda Street, Buffalo, New York 14207

6. Business Contact John C. MacLauchlan Phone 716-873-6000

7. Technical Contact John C. MacLauchlan Phone 716-873-6000

The following information is being required to comply with RCRA 40 CFR Part 265.13 (O.A.C. 3745-65-13) General Waste Analysis.

II. GENERAL WASTE INFORMATION

8. Waste Material Name Water Contaminated with Solvent 9. Generator Code (Optional) _____

10. Describe process that generates waste Cleaning of Filling Equipment 11. SIC Code _____

12. Is your company the original generator of this waste? ☐ Yes ☐ No If no, provide the name of the original generator _____

13. If this waste is a still bottom, are you the original generator of the feed stock? ☐ Yes ☐ No.

If no, who is the source of the feed stock? _____

14. Rate of Generation 500 gals./Month Current Accumulation: Drums 20 Bulk (Gal.) _____

15. Check all types of containerization for which you request quotation.

X 55 Gallon Steel Drums

_____ 55 Gallon Fiber Drum

_____ 70 Gallon Steel Drums (Without Inside Container)

_____ 5 Gallon Pail

_____ 70 Gallon Recovery Drum (With Fiber or Steel Drums Inside)

_____ Bulk

_____ Palletized:

_____ Other

Overall Dimensions of Material on Pallet _____ x _____ x _____ (High)

Dimensions of Pallet Only _____ x _____ x _____ (High)

What are the small containers on the pallet? _____ (1 Qt. Bottles, Aerosol Cans, Etc.)

III. WASTE STREAM CHEMICAL COMPOSITION

16. COMPONENTS INCLUDING CONTAMINANTS	CONCENTRATION RANGE WT%		AVERAGE WT% MUST TOTAL 100%	TLV (IF PUBLISHED) ACGIH	OSHA
	_____ to _____				
Water	70 to 80		75		
VM & P Naptha	2 to 6		4		
Mineral Spirits	12 to 18		16		
Xylene	0 to 4		2		
Calcium Carbonate	0 to 2		1		
Titanium Dioxide	0 to 1		.5		
Color Pigments	0 to 2		1		
Silica	0 to 1		.5		
	_____ to _____		TOTAL 100%		

* If applicable, this waste stream was previously described by W.P.S. 10513

Attach to this Form any additional information which must be known to treat, store or dispose of the waste in accordance with RCRA Section 265.13 (Ohio Administrative Code 3745-65-13), including but not limited to data developed under RCRA 261 (OAC 3745-51), Laboratory Analysis, Technical Publications or Safety Data Sheets.

REFER TO THE INSTRUCTIONS PRINTED ON THE REVERSE SIDE OF THIS FORM.

Revised 5/1/84

21776

IV. SPECIFIC ANALYSIS OF WASTE

Answer every item in this section. Do not leave blanks. If the specific element is not present, indicate None.

17. Organic Bound Sulfur* None %WT
Chlorine* None %WT
Fluorine* None %WT
Bromine* None %WT
Iodine* None %WT
Nitrogen None %WT
Phosphorus None %WT

(Base % WT on Molecular Structure)

18. Metals (Actual Content)
Lead* None PPM
Mercury* None PPM
Arsenic None PPM
Barium None PPM
Cadmium None PPM
Chromium None PPM
Selenium None PPM
Silver None PPM

19. Does this waste contain PCBs?

☒ No ☐ Yes. If yes, give the concentration regardless of amount and attach supporting documentation.

_____ PPM

20. Does this waste contain insecticides, pesticides, herbicides or rodenticides?

☒ No ☐ Yes If yes, identify each in the space below and the concentrations.

_____ PPM

_____ PPM

(Include Safety Data Sheets for each)

V. TOXICITY

21. Check Applicable Data

X Ingestion Explain Solvents
_____ Inhalation Explain _____
X Dermal Explain Solvents
X Eyes Explain Solvents
_____ Other Explain _____
_____ Carcinogen (suspected or known) Explain

VI. PHYSICAL PROPERTIES

22. Physical State at 70° F. (Circle)

(Liquid) Semisolid Solid
Slurry Sludge Gas

Viscosity at 70° F Like Water SUS CPS

23. Is material pourable/(pumpable?)

☐ No ☒ Yes

24. Is waste multi layered? ☐ No ☒ Yes

1. (Top) 98 % 3. _____ %
2. 2 % 4. _____ %

25. Dissolved solids --- % WT
26. Suspended Solids --- % WT
27. BTU Value/Lbs. * Low
28. Ash Content (% by Wt.) ---
29. Flash Point Less than 100 °F
30. Specific Gravity Approximately .93
31. PH 7 - 8
32. Color Dirty Gray, Brown, Green
33. Odor Like Mineral Spirits/VM&P Naptha

VII. REACTIVITY & STABILITY

34. Is this material reactive? ☐ Yes ☒ No

Chemically Reactive with _____

35. Is this material stable? ☒ Yes ☐ No

If no, explain _____

* These items are specifically required by RCRA Part 265 Subpart 0 (O.A.C. 3745-68-40 through 3745-68-47).

WASTE PRODUCT SURVEY

21776

VIII. EPA INFORMATION

36. Is this waste hazardous as defined by RCRA Part 261 (O.A.C. 3745-51)? ☐ Yes ☐ No

If yes, list the applicable EPA Hazardous Waste Number(s) and explain why you have assigned the number(s). For example if you assign D001 the reason for selection is that the flashpoint is less than 140°F. If you assign F001, the reason for selection may be that the waste is the still bottom from recovery of methylene chloride.

EPA Hazardous Waste Number(s)	Reason for Selection
D001	Flash Point Less than 100°F

37. If the waste is not hazardous as defined by federal regulation but is hazardous as defined by the state regulations in which the waste was generated, please provide the state hazardous waste number(s). Also provide any state hazardous numbers that are not included in the federal regulations.

State Hazardous Waste Number(s)	Reason for Selection

IX. DOT INFORMATION

In accordance with the Department of Transportation 49 CFR Parts 171 through 177.

38. DOT Proper Shipping Name Waste Flammable Liquid NOS

39. DOT Hazard Class Flammable Liquid

40. DOT UN or NA Number UN1993

41. Container Label(s) Flammable Liquid and Hazardous Waste Label
(For containers of 110 gallons or less)

42. Placard(s) _____

For assistance call Department of Transportation Regulations Division. Phone (202) 426-0033.

Generators of hazardous waste shipments must also comply with the labeling requirements of RCRA 40 CFR Part 262 (O.A.C. 3745-52).

X. ACCOUNTABILITY STATEMENT

43. I hereby certify that I have personally examined and am familiar with the information submitted in this and all attached documents. Based on my inquiry of those individuals immediately responsible for obtaining the information, the submitted information is true, accurate, and complete and all known and suspected hazards have been disclosed.

Authorized Signature	Title	Date
John C MacDonald	Project Engineer	4-11-85

ROSS

Ross Incineration Services, Inc.
394 Giles Rd.
Grafton, OH 44044
PH. (216) 748-2171

WASTE PRODUCT SURVEY

1. # 21777 *

USEPA Facility ID# OHDO48415665

I. GENERATOR INFORMATION

2. Generator PRATT & LAMBERT, INC. 3. USEPA ID# NYD002113322

4. Mailing Address P.O. Box 22, Buffalo, New York 14240

5. Plant Address 75 Tonawanda Street, Buffalo, New York 14207

6. Business Contact John C. MacLauchlan Phone 716-873-6000

7. Technical Contact John C. MacLauchlan Phone 716-873-6000

The following information is being required to comply with RCRA 40 CFR Part 265.13 (O.A.C. 3745-65-13) General Waste Analysis.

II. GENERAL WASTE INFORMATION

8. Waste Material Name Caustic Water Sludge 9. Generator Code (Optional)

10. Describe process that generates waste Cleaning Caustic Storage Tanks 11. SIC Code

12. Is your company the original generator of this waste? XX ☐ Yes ☐ No If no, provide the name of the original generator

13. If this waste is a still bottom, are you the original generator of the feed stock? ☐ Yes ☐ No.

If no, who is the source of the feed stock?

14. Rate of Generation 25 Drums/Year Current Accumulation: Drums 0 Bulk (Gal.)

15. Check all types of containerization for which you request quotation.

X 55 Gallon Steel Drums

____ 55 Gallon Fiber Drum

____ 70 Gallon Steel Drums (Without Inside Container)

____ 5 Gallon Pail

____ 70 Gallon Recovery Drum (With Fiber or Steel Drums Inside)

____ Bulk

____ Palletized:

____ Other

Overall Dimensions of Material on Pallet ____ x ____ x ____ (High)

Dimensions of Pallet Only ____ x ____ x ____ (High)

What are the small containers on the pallet? ____ (1 Qt. Bottles, Aerosol Cans, Etc.)

III. WASTE STREAM CHEMICAL COMPOSITION

16. COMPONENTS INCLUDING CONTAMINANTS	CONCENTRATION RANGE WT%	AVERAGE WT% MUST TOTAL 100%	TLV (IF PUBLISHED) ACGIH	OSHA
	to			
Sodium Hydroxide	1 to 5	3		
Alkyd Resins	10 to 75	40		
Acrylic Resins	4 to 7	6		
Urethane Resins	5 to 8	7		
Water	80 to 5	44		
	to			
	to			
	to			
	to			
		TOTAL 100%		

* If applicable, this waste stream was previously described by W.P.S. 13457

Attach to this Form any additional information which must be known to treat, store or dispose of the waste in accordance with RCRA Section 265.13 (Ohio Administrative Code 3745-65-13), including but not limited to data developed under RCRA 261 (OAC 3745-51), Laboratory Analysis, Technical Publications or Safety Data Sheets.

REFER TO THE INSTRUCTIONS PRINTED ON THE REVERSE SIDE OF THIS FORM.

Revised 5/1/84

WASTE PRODUCT SURVEY

21777

IV. SPECIFIC ANALYSIS OF WASTE

Answer every item in this section. Do not leave blanks. If the specific element is not present, indicate None.

17. Organic Bound Sulfur* None %WT
Chlorine* None %WT
Fluorine* None %WT
Bromine* None %WT
Iodine* None %WT
Nitrogen None %WT
Phosphorus None %WT

(Base % WT on Molecular Structure)

18. Metals (Actual Content)
Lead* None PPM
Mercury* None PPM
Arsenic None PPM
Barium None PPM
Cadmium None PPM
Chromium None PPM
Selenium None PPM
Silver None PPM

19. Does this waste contain PCBs?

☒ No ☐ Yes. If yes, give the concentration regardless of amount and attach supporting documentation.

_____ PPM

20. Does this waste contain insecticides, pesticides, herbicides or rodenticides?

☒ No ☐ Yes If yes, identify each in the space below and the concentrations.

_____ PPM

_____ PPM

(Include Safety Data Sheets for each)

V. TOXICITY

21. Check Applicable Data

X Ingestion Explain Corrosive
_____ Inhalation Explain _____
X Dermal Explain Corrosive
X Eyes Explain Corrosive
_____ Other Explain _____
_____ Carcinogen (suspected or known) Explain

VI. PHYSICAL PROPERTIES

22. Physical State at 70° F. (Circle)

Liquid	Semisolid	Solid
(Slurry)	(Sludge)	Gas

Viscosity at 70° F Low/High SUS CPS

23. Is material pourable/pumpable?

☒ No ☐ Yes

24. Is waste multi layered? ☐ No ☒ Yes

1. (Top) 20 % 3. 50 %
2. 30 % 4. _____ %

25. Dissolved solids --- % WT
26. Suspended Solids 50 - 80 % WT
27. BTU Value/Lbs. * Low
28. Ash Content (% by Wt.) 10 - 20
29. Flash Point Greater than 150 °F
30. Specific Gravity 1.2 - 1.4
31. PH Greater than 12.5
32. Color Light Brown, Red Brown
33. Odor Caustic Like

VII. REACTIVITY & STABILITY

34. Is this material reactive? ☐ Yes ☒ No

Chemically Reactive with _____

35. Is this material stable? ☒ Yes ☐ No

If no, explain _____

* These items are specifically required by RCRA Part 265 Subpart 0 (O.A.C. 3745-68-40 through 3745-68-47).

WASTE PRODUCT SURVEY

21777

VIII. EPA INFORMATION

36. Is this waste hazardous as defined by RCRA Part 261 (O.A.C. 3745-51)? ☐ Yes ☐ No

If yes, list the applicable EPA Hazardous Waste Number(s) and explain why you have assigned the number(s). For example if you assign D001 the reason for selection is that the flashpoint is less than 140°F. If you assign F001, the reason for selection may be that the waste is the still bottom from recovery of methylene chloride.

EPA Hazardous Waste Number(s)	Reason for Selection
D002	Corrosive

37. If the waste is not hazardous as defined by federal regulation but is hazardous as defined by the state regulations in which the waste was generated, please provide the state hazardous waste number(s). Also provide any state hazardous numbers that are not included in the federal regulations.

State Hazardous Waste Number(s)	Reason for Selection

IX. DOT INFORMATION

In accordance with the Department of Transportation 49 CFR Parts 171 through 177.

38. DOT Proper Shipping Name: Waste - Corrosive Liquid NOS

39. DOT Hazard Class: Corrosive Material

40. DOT UN or NA Number: UN1760

41. Container Label(s): Corrosive and Hazardous Waste
(For containers of 110 gallons or less)

42. Placard(s):

For assistance call Department of Transportation Regulations Division. Phone (202) 426-0033.

Generators of hazardous waste shipments must also comply with the labeling requirements of RCRA 40 CFR Part 262 (O.A.C. 3745-52).

X. ACCOUNTABILITY STATEMENT

43. I hereby certify that I have personally examined and am familiar with the information submitted in this and all attached documents. Based on my inquiry of those individuals immediately responsible for obtaining the information, the submitted information is true, accurate, and complete and all known and suspected hazards have been disclosed.

John C MacFarlane — Authorized Signature

Project Engineer — Title

4/11/85 — Date

Revised 5/1/84

Ross Incineration Services, Inc.
394 Giles Rd.
Grafton, OH 44044
PH. (216) 748-2171

WASTE PRODUCT SURVEY

1. # 21773 *

USEPA Facility ID# OHDO48415665

I. GENERATOR INFORMATION

2. Generator PRATT & LAMBERT, INC. 3. USEPA ID# NYD002113322

4. Mailing Address P.O. Box 22, Buffalo, New York 14240

5. Plant Address 75 Tonawanda Street, Buffalo, New York 14207

6. Business Contact John C. MacLauchlan Phone 716-873-6000

7. Technical Contact John C. MacLauchlan Phone 716-873-6000

The following information is being required to comply with RCRA 40 CFR Part 265.13 (O.A.C. 3745-65-13) General Waste Analysis.

II. GENERAL WASTE INFORMATION

8. Waste Material Name Solvent Paint Sludge 9. Generator Code (Optional) AW or BW

10. Describe process that generates waste wash solvent from paint processing tanks and other equipment 11. SIC Code

12. Is your company the original generator of this waste? ☒ Yes ☐ No If no, provide the name of the original generator

13. If this waste is a still bottom, are you the original generator of the feed stock? ☐ Yes ☐ No.

If no, who is the source of the feed stock?

14. Rate of Generation 10 Drums/Week Current Accumulation: Drums 50 Bulk (Gal.)

15. Check all types of containerization for which you request quotation.

X 55 Gallon Steel Drums	55 Gallon Fiber Drum
70 Gallon Steel Drums (Without Inside Container)	5 Gallon Pail
70 Gallon Recovery Drum (With Fiber or Steel Drums Inside)	X Bulk
Palletized:	Other

Overall Dimensions of Material on Pallet ____ x ____ x ____ (High)

Dimensions of Pallet Only ____ x ____ x ____ (High)

What are the small containers on the pallet? ____ (1 Qt. Bottles, Aerosol Cans, Etc.)

III. WASTE STREAM CHEMICAL COMPOSITION

16. COMPONENTS INCLUDING CONTAMINANTS	CONCENTRATION RANGE WT%	AVERAGE WT% MUST TOTAL 100%	TLV (IF PUBLISHED) ACGIH	OSHA
	to			
Alkyd Resin	10 to 20	15		
Other Resins	0 to 5	3		
Mineral Spirits	10 to 15	14		
Silica	5 to 15	12		
Calcium Carbonate	20 to 30	25		
Titanium Dioxide	20 to 45	30		
Color Pigments	0 to 2	1		
	to			
	to			
		TOTAL 100%		

* If applicable, this waste stream was previously described by W.P.S. 9880

Attach to this Form any additional information which must be known to treat, store or dispose of the waste in accordance with RCRA Section 265.13 (Ohio Administrative Code 3745-65-13), including but not limited to data developed under RCRA 261 (OAC 3745-51), Laboratory Analysis, Technical Publications or Safety Data Sheets.

REFER TO THE INSTRUCTIONS PRINTED ON THE REVERSE SIDE OF THIS FORM.

Revised 5/1/84

21773

IV. SPECIFIC ANALYSIS OF WASTE

Answer every item in this section. Do not leave blanks. If the specific element is not present, indicate None.

17. Organic Bound Sulfur* None %WT
Chlorine* None %WT
Fluorine* None %WT
Bromine* None %WT
Iodine* None %WT
Nitrogen None %WT
Phosphorus None %WT

(Base % WT on Molecular Structure)

18. Metals (Actual Content)
Lead* None PPM
Mercury* None PPM
Arsenic None PPM
Barium None PPM
Cadmium None PPM
Chromium None PPM
Selenium None PPM
Silver None PPM

19. Does this waste contain PCBs?

XX No ☐ Yes. If yes, give the concentration regardless of amount and attach supporting documentation.

_____ PPM

20. Does this waste contain insecticides, pesticides, herbicides or rodenticides?

XX No ☐ Yes If yes, identify each in the space below and the concentrations.

_____ PPM

_____ PPM

(Include Safety Data Sheets for each)

V. TOXICITY

21. Check Applicable Data

X Ingestion Explain Solvents
_____ Inhalation Explain _____
X Dermal Explain Solvents
X Eyes Explain Solvents
_____ Other Explain _____
_____ Carcinogen (suspected or known) Explain

VI. PHYSICAL PROPERTIES

22. Physical State at 70° F. (Circle)

Liquid	Semisolid	Solid
Slurry	(Sludge)	Gas

Viscosity at 70° F High SUS CPS

23. Is material pourable/(pumpable?)

☐ No ☒ Yes

24. Is waste multi layered? ☐ No XX ☐ Yes

1. (Top) 10 % 3. _____ %
2. 90 % 4. _____ %

25. Dissolved solids _____ % WT

26. Suspended Solids - % WT

27. BTU Value/Lbs. * 8000 - 10000

28. Ash Content (% by Wt.) 20-25

29. Flash Point Below 100 °F

30. Specific Gravity Approx. 1.4

31. PH 6 - 8

32. Color Dirty Gray or Brown

33. Odor Like Mineral Spirits

VII. REACTIVITY & STABILITY

34. Is this material reactive? ☐ Yes X ☐ No

Chemically Reactive with _____

35. Is this material stable? XX Yes ☐ No

If no, explain _____

* These items are specifically required by RCRA Part 265 Subpart 0 (O.A.C. 3745-68-40 through 3745-68-47).

WASTE PRODUCT SURVEY

21773

VIII. EPA INFORMATION

36. Is this waste hazardous as defined by RCRA Part 261 (O.A.C. 3745-51)? ☐ Yes ☐ No

If yes, list the applicable EPA Hazardous Waste Number(s) and explain why you have assigned the number(s). For example if you assign D001 the reason for selection is that the flashpoint is less than 140°F. If you assign F001, the reason for selection may be that the waste is the still bottom from recovery of methylene chloride.

EPA Hazardous Waste Number(s)	Reason for Selection
D001	Flashpoint Below 100°F

37. If the waste is not hazardous as defined by federal regulation but is hazardous as defined by the state regulations in which the waste was generated, please provide the state hazardous waste number(s). Also provide any state hazardous numbers that are not included in the federal regulations.

State Hazardous Waste Number(s)	Reason for Selection

IX. DOT INFORMATION

In accordance with the Department of Transportation 49 CFR Parts 171 through 177.

38. DOT Proper Shipping Name Waste Flammable Liquid NOS

39. DOT Hazard Class Flammable Liquid

40. DOT UN or NA Number UN1993

41. Container Label(s) ---
(For containers of 110 gallons or less)

42. Placard(s) Flammable UN1993

For assistance call Department of Transportation Regulations Division. Phone (202) 426-0033.

Generators of hazardous waste shipments must also comply with the labeling requirements of RCRA 40 CFR Part 262 (O.A.C. 3745-52).

X. ACCOUNTABILITY STATEMENT

43. I hereby certify that I have personally examined and am familiar with the information submitted in this and all attached documents. Based on my inquiry of those individuals immediately responsible for obtaining the information, the submitted information is true, accurate, and complete and all known and suspected hazards have been disclosed.

John C. MacTavish — Authorized Signature

Project Engineer — Title

4/11/85 — Date

Revised 5/1/84

ROSS

Ross Incineration Services, Inc.
394 Giles Rd.
Grafton, OH 44044
PH. (216) 748-2171

WASTE PRODUCT SURVEY

1. # 21775 *

USEPA Facility ID# OHDO48415665

I. GENERATOR INFORMATION

2. Generator PRATT & LAMBERT, INC. 3. USEPA ID# NYD002113322

4. Mailing Address P.O. Box 22, Buffalo, New York 14240

5. Plant Address 75 Tonawanda Street, Buffalo, New York 14207

6. Business Contact John C. MacLauchlan Phone 716-873-6000

7. Technical Contact John C. MacLauchlan Phone 716-873-6000

The following information is being required to comply with RCRA 40 CFR Part 265.13 (O.A.C. 3745-65-13) General Waste Analysis.

II. GENERAL WASTE INFORMATION

8. Waste Material Name Caustic Wash Water 9. Generator Code (Optional) _____

10. Describe process that generates waste Caustic Cleaning Resin Reactors 11. SIC Code _____

12. Is your company the original generator of this waste? XX Yes ☐ No If no, provide the name of the original generator _____

13. If this waste is a still bottom, are you the original generator of the feed stock? ☐ Yes ☐ No.

If no, who is the source of the feed stock? _____

14. Rate of Generation 4,000 gals./1.5 Months Current Accumulation: Drums _____ Bulk (Gal.) 2,000

15. Check all types of containerization for which you request quotation.

_____ 55 Gallon Steel Drums	_____ 55 Gallon Fiber Drum
_____ 70 Gallon Steel Drums (Without Inside Container)	_____ 5 Gallon Pail
_____ 70 Gallon Recovery Drum (With Fiber or Steel Drums Inside)	XX Bulk
_____ Palletized:	_____ Other

Overall Dimensions of Material on Pallet _____ x _____ x _____ (High)

Dimensions of Pallet Only _____ x _____ x _____ (High)

What are the small containers on the pallet? _____ (1 Qt. Bottles, Aerosol Cans, Etc.)

III. WASTE STREAM CHEMICAL COMPOSITION

16. COMPONENTS INCLUDING CONTAMINANTS	CONCENTRATION RANGE WT%	AVERAGE WT% MUST TOTAL 100%	TLV (IF PUBLISHED) ACGIH	OSHA
	to			
Sodium Hydroxide	1 to 5	3		
Alkyd Resins	1 to 4	2		
Acrylic Resins	0 to 2	1		
Urethane Resins	0 to 2	1		
Water	98 to 87	93		
	to			
	to			
	to			
	to			
		TOTAL 100%		

* If applicable, this waste stream was previously described by W.P.S. 13037

Attach to this Form any additional information which must be known to treat, store or dispose of the waste in accordance with RCRA Section 265.13 (Ohio Administrative Code 3745-65-13), including but not limited to data developed under RCRA 261 (OAC 3745-51), Laboratory Analysis, Technical Publications or Safety Data Sheets.

REFER TO THE INSTRUCTIONS PRINTED ON THE REVERSE SIDE OF THIS FORM.

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WASTE PRODUCT SURVEY

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_____

IV. SPECIFIC ANALYSIS OF WASTE

Answer every item in this section. Do not leave blanks. If the specific element is not present, indicate None.

17. Organic Bound Sulfur* None %WT
Chlorine* None %WT
Fluorine* None %WT
Bromine* None %WT
Iodine* None %WT
Nitrogen None %WT
Phosphorus None %WT

(Base % WT on Molecular Structure)

18. Metals (Actual Content)
Lead* None PPM
Mercury* None PPM
Arsenic None PPM
Barium None PPM
Cadmium None PPM
Chromium None PPM
Selenium None PPM
Silver None PPM

19. Does this waste contain PCBs?

☒ No ☐ Yes. If yes, give the concentration regardless of amount and attach supporting documentation.

_____ PPM

20. Does this waste contain insecticides, pesticides, herbicides or rodenticides?

☒ No ☐ Yes If yes, identify each in the space below and the concentrations.

_____ PPM

_____ PPM

(Include Safety Data Sheets for each)

V. TOXICITY

21. Check Applicable Data

X Ingestion Explain Corrosive
X Inhalation Explain Corrosive
X Dermal Explain Corrosive
X Eyes Explain Corrosive
X Other Explain Corrosive
_____ Carcinogen (suspected or known) Explain

VI. PHYSICAL PROPERTIES

22. Physical State at 70° F. (Circle)

(Liquid) Semisolid Solid
Slurry Sludge Gas

Viscosity at 70° F Like Water SUS CPS

23. Is material pourable/(pumpable)?

☐ No ☒ Yes

24. Is waste multi layered? ☐ No X ☐ Yes

1. (Top) 3 % 3. _____ %
2. 97 % 4. _____ %

25. Dissolved solids -- % WT
26. Suspended Solids 2 % WT
27. BTU Value/Lbs. * Low
28. Ash Content (% by Wt.) 1
29. Flash Point Less than 150 °F
30. Specific Gravity 1.0 - 1.2
31. PH 12 - 14
32. Color Brown
33. Odor Like Mineral Spirits

VII. REACTIVITY & STABILITY

34. Is this material reactive? ☐ Yes XX ☐ No

Chemically Reactive with _____

35. Is this material stable? ☒ Yes ☐ No

If no, explain _____

* These items are specifically required by RCRA Part 265 Subpart 0 (O.A.C. 3745-68-40 through 3745-68-47).

WASTE PRODUCT SURVEY

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VIII. EPA INFORMATION

36. Is this waste hazardous as defined by RCRA Part 261 (O.A.C. 3745-51)? ☐ Yes ☐ No

If yes, list the applicable EPA Hazardous Waste Number(s) and explain why you have assigned the number(s). For example if you assign D001 the reason for selection is that the flashpoint is less than 140°F. If you assign F001, the reason for selection may be that the waste is the still bottom from recovery of methylene chloride.

EPA Hazardous Waste Number(s)	Reason for Selection
D002	Corrosive

37. **If the waste is not hazardous as defined by federal regulation but is hazardous as defined by the state regulations in which the waste was generated, please provide the state hazardous waste number(s). Also provide any state hazardous numbers that are not included in the federal regulations.**

State Hazardous Waste Number(s)	Reason for Selection

IX. DOT INFORMATION

In accordance with the Department of Transportation 49 CFR Parts 171 through 177.

38. DOT Proper Shipping Name: Waste - Corrosive Liquid NOS

39. DOT Hazard Class: Corrosive Material

40. DOT UN or NA Number: UN1760

41. Container Label(s): --

(For containers of 110 gallons or less)

42. Placard(s): Corrosive UN1760

For assistance call Department of Transportation Regulations Division. Phone (202) 426-0033.

Generators of hazardous waste shipments must also comply with the labeling requirements of RCRA 40 CFR Part 262 (O.A.C. 3745-52).

X. ACCOUNTABILITY STATEMENT

43. I hereby certify that I have personally examined and am familiar with the information submitted in this and all attached documents. Based on my inquiry of those individuals immediately responsible for obtaining the information, the submitted information is true, accurate, and complete and all known and suspected hazards have been disclosed.

Authorized Signature	Title	Date
John C MacTavish	Project Engineer	4/11/85

Revised 5/1/84

ROSS

Ross Incineration Services, Inc.
394 Giles Rd.
Grafton, OH 44044
PH. (216) 748-2171

WASTE PRODUCT SURVEY

1. # 21967 *

USEPA Facility ID# OHDO48415665

I. GENERATOR INFORMATION

2. Generator PRATT & LAMBERT, INC. 3. USEPA ID# NYD002113322

4. Mailing Address P. O. BOX 22 BUFFALO, N EW YORK 14240

5. Plant Address 75 Tonawanda St., Buffalo, New York 14207

6. Business Contact E. G. LeVea Phone 716 873 6000

7. Technical Contact E. G. LeVea Phone 716 873 6000

The following information is being required to comply with RCRA 40 CFR Part 265.13 (O.A.C. 3745-65-13) General Waste Analysis.

II. GENERAL WASTE INFORMATION

8. Waste Material Name L.P. Spent wash solvent 9. Generator Code (Optional)

10. Describe process that generates waste Equipment cleaning 11. SIC Code

12. Is your company the original generator of this waste? ☒ Yes ☐ No If no, provide the name of the original generator

13. If this waste is a still bottom, are you the original generator of the feed stock? ☐ Yes ☐ No.

If no, who is the source of the feed stock?

14. Rate of Generation 700 Gals/MO. Current Accumulation: Drums 16 Bulk (Gal.) 800 Gal

15. Check all types of containerization for which you request quotation.

X 55 Gallon Steel Drums

55 Gallon Fiber Drum

70 Gallon Steel Drums (Without Inside Container)

5 Gallon Pail

70 Gallon Recovery Drum (With Fiber or Steel Drums Inside)

Bulk

Palletized:

Other

Overall Dimensions of Material on Pallet ____ x ____ x ____ (High)

Dimensions of Pallet Only ____ x ____ x ____ (High)

What are the small containers on the pallet? ____ (1 Qt. Bottles, Aerosol Cans, Etc.)

III. WASTE STREAM CHEMICAL COMPOSITION

16. COMPONENTS INCLUDING CONTAMINANTS	CONCENTRATION RANGE WT%	AVERAGE WT% MUST TOTAL 100%	TLV (IF PUBLISHED) ACGIH	OSHA
MEK	52 to 58	55		
XYLENE	21 to 16	18		
ALKYD RESIN	5 to 3	4		
OTHER RESINS	3 to 5	4		
TALC	3 to 2	3		
T I 02	10 to 8	9		
COLOR PIGMENTS	6 to 8	7		
	to			
	to			
	to			
		TOTAL 100%		

* If applicable, this waste stream was previously described by W.P.S. ____

Attach to this Form any additional information which must be known to treat, store or dispose of the waste in accordance with RCRA Section 265.13 (Ohio Administrative Code 3745-65-13), including but not limited to data developed under RCRA 261 (OAC 3745-51), Laboratory Analysis, Technical Publications or Safety Data Sheets.

REFER TO THE INSTRUCTIONS PRINTED ON THE REVERSE SIDE OF THIS FORM.

Revised 5/1/84

IV. SPECIFIC ANALYSIS OF WASTE

Answer every item in this section. Do not leave blanks. If the specific element is not present, indicate None.

17. Organic Bound Sulfur* NONE %WT
    Chlorine* NONE %WT
    Fluorine* NONE %WT
    Bromine* NONE %WT
    Iodine* NONE %WT
    Nitrogen NONE %WT
    Phosphorus NONE %WT
    (Base % WT on Molecular Structure)

18. Metals (Actual Content)
    Lead* 100 PPM
    Mercury* NONE PPM
    Arsenic NONE PPM
    Barium 2000 PPM
    Cadmium 200 PPM
    Chromium 200 PPM
    Selenium NONE PPM
    Silver NONE PPM

19. Does this waste contain PCBs?

    ☒ No ☐ Yes. If yes, give the concentration regardless of amount and attach supporting documentation.

    _____ PPM

20. Does this waste contain insecticides, pesticides, herbicides or rodenticides?

    ☒ No ☐ Yes If yes, identify each in the space below and the concentrations.

    _____ PPM

    _____ PPM

    (Include Safety Data Sheets for each)

V. TOXICITY

21. Check Applicable Data

    X Ingestion Explain MEK
    X Inhalation Explain MEK
    X Dermal Explain MEK
    X Eyes Explain MEK
    _____ Other Explain _____
    _____ Carcinogen (suspected or known) Explain

VI. PHYSICAL PROPERTIES

22. Physical State at 70° F. (Circle)

Liquid	Semisolid	Solid
XX Slurry	Sludge	Gas

    Viscosity at 70° F LOW SUS / CPS

23. Is material pourable/pumpable?

    ☐ No ☒ Yes

24. Is waste multi layered? ☐ No ☒ Yes

    1. (Top) 80 % 3. _____ %
    2. 20 % 4. _____ %

25. Dissolved solids _____ % WT
26. Suspended Solids 20 % WT
27. BTU Value/Lbs. * 18000 - 20000
28. Ash Content (% by Wt.) Approx 5%
29. Flash Point 20° - 40° °F
30. Specific Gravity 1
31. PH - Neutral
32. Color DIRTY GRAY BROWN
33. Odor LIKE MEK

VII. REACTIVITY & STABILITY

34. Is this material reactive? ☐ Yes ☒ No

    Chemically Reactive with _____

35. Is this material stable? ☒ Yes ☐ No

    If no, explain _____

* These items are specifically required by RCRA Part 265 Subpart 0 (O.A.C. 3745-68-40 through 3745-68-47).

WASTE PRODUCT SURVEY

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VIII. EPA INFORMATION

36. Is this waste hazardous as defined by RCRA Part 261 (O.A.C. 3745-51)? ☐ Yes ☐ No

If yes, list the applicable EPA Hazardous Waste Number(s) and explain why you have assigned the number(s). For example if you assign D001 the reason for selection is that the flashpoint is less than 140°F. If you assign F001, the reason for selection may be that the waste is the still bottom from recovery of methylene chloride.

EPA Hazardous Waste Number(s)	Reason for Selection
D001	FLASH POINT LESS THAN 140°F
	(FLAMMABLE LIQUID)

37. If the waste is not hazardous as defined by federal regulation but is hazardous as defined by the state regulations in which the waste was generated, please provide the state hazardous waste number(s). Also provide any state hazardous numbers that are not included in the federal regulations.

State Hazardous Waste Number(s)	Reason for Selection

IX. DOT INFORMATION

In accordance with the Department of Transportation 49 CFR Parts 171 through 177.

38. DOT Proper Shipping Name: WASTE - FLAMMABLE LIQUID NOS

39. DOT Hazard Class: FLAMMABLE LIQUID

40. DOT UN or NA Number: UN 1993

41. Container Label(s): FLAMMABLE LIQUID
(For containers of 110 gallons or less)

42. Placard(s): FLAMMABLE

For assistance call Department of Transportation Regulations Division. Phone (202) 426-0033.

Generators of hazardous waste shipments must also comply with the labeling requirements of RCRA 40 CFR Part 262 (O.A.C. 3745-52).

X. ACCOUNTABILITY STATEMENT

43. I hereby certify that I have personally examined and am familiar with the information submitted in this and all attached documents. Based on my inquiry of those individuals immediately responsible for obtaining the information, the submitted information is true, accurate, and complete and all known and suspected hazards have been disclosed.

E. J. LeClaire — Authorized Signature

Project Engineer — Title

1/27/86 — Date

Revised 5/1/84

CONTAINERIZED HAZARDOUS WASTE RECORD - 1987

DRUM NO	DATE GENERAT.	GENERAT. DEPT.	WASTE CODE
4694	12/11/86	YARD	AW
4044	12/22/86	R&D LAB	AW
4693	12/22/86	YARD	AW
4095	1/12/87	YARD	AW
[illegible]	1/12/87	YARD	AW
5885	1/12/87	YARD	AW
[illegible]	1/12/87	YARD	AW
[illegible]	1/12/87	YARD	AW
[illegible]	1/12/87	YARD	AW
[illegible]	1/12/87	YARD	AW
[illegible]	1/12/87	YARD	AW
[illegible]	1/12/87	YARD	AW
[illegible]	1/12/87	YARD	AW
[illegible]	1/12/87	YARD	AW
[illegible]	1/12/87	YARD	AW
[illegible]	1/12/87	YARD	AW
[illegible]	1/12/87	YARD	AW
[illegible]	1/12/87	YARD	AW
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[illegible]	1/15/87	YARD	AW
[illegible]	1/15/87	YARD	AW
[illegible]	1/15/87	YARD	AW
[illegible]	1/15/87	YARD	AW
5910	1/16/87	YARD	AW
[illegible]	1/16/87	YARD	AW
[illegible]	1/16/87	YARD	AW
[illegible]	1/16/87	YARD	AW
[illegible]	1/16/87	YARD	AW
[illegible]	1/16/87	YARD	AW
[illegible]	1/16 87	YARD	AW
[illegible]	[illegible]	YARD	AW
[illegible]	[illegible]	YARD	AW
[illegible]	[illegible]	[illegible]	AW
[illegible]	[illegible]	YARD	[illegible]
[illegible]	[illegible]	[illegible]	AW
[illegible]	[illegible]	[illegible]	AW
[illegible]	[illegible]	[illegible]	AW
[illegible]	[illegible]	[illegible]	AW
[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	YARD	[illegible]

TOTAL: 43 DRUMS

2600	1/06/87	LACQUER	BW
2601	1/06/87	LACQUER	BW

TOTAL: 2 DRUMS

3793	1/15/87	VARNISH	FW
3794	1/15/87	VARNISH	FW
3795	1/15/87	VARNISH	FW
3796	1/15/87	VARNISH	FW
3797	1/15/87	VARNISH	FW

TOTAL: 5 DRUMS

3776	1/13/87	VARNISH	CW
3777	1/13/87	VARNISH	CW
3778	1/13/87	VARNISH	CW
3779	1/13/87	VARNISH	CW
3780	1/13/87	VARNISH	CW
3781	1/13/87	VARNISH	CW
3782	1/13/87	VARNISH	CW
3783	1/13/87	VARNISH	CW
3784	1/13/87	VARNISH	CW
3785	1/13/87	VARNISH	CW
3786	1/13/87	VARNISH	CW
3787	1/13/87	VARNISH	CW
3788	1/13/87	VARNISH	CW
3789	1/13/87	VARNISH	CW
3790	1/13/87	VARNISH	CW
3791	1/13/87	VARNISH	CW
3792	1/13/87	VARNISH	CW

TOTAL: 17 DRUMS

GRAND TOTAL: 72 DRUMS