

PCB STORAGE SITE CLOSURE PLAN
FOR
NIAGARA TRANSFORMER CORPORATION
SENECA STREET SITE

March, 1987

Submitted to:
NEW YORK STATE DEPARTMENT OF
ENVIRONMENTAL CONSERVATION
REGION 9 OFFICE

NUSSBAUMER & CLARKE, INC.
CONSULTING ENGINEERS

PCB STORAGE SITE CLOSURE PLAN
FOR
NIAGARA TRANSFORMER CORPORATION
SENECA STREET SITE

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I. FACILITY CONDITION

Niagara Transformer Corporation (NTC) is a local producer of commercial transformers. This closure plan applies to the following NTC facility:

1600 Seneca Street, Buffalo, New York 14210

EPA ID No. NYT370011223

A site plan of the Seneca Street facility appears in Appendix A.

The facility was used to temporarily store PCB insulating fluid and other PCB contaminated materials that resulted from NTC operations. The wastes were collected in 55 gallon drums at the NTC Dale Road location and transported to Seneca Street. The storage site consists of a 990 square foot area of Building No. 6 (refer to Appendix A). The drums were kept within secondary containment steel trays, sized to contain all wastes should a drum rupture or leak. A total of twelve trays had been used during the peak storage period.

*How transported
by others?
Nia Transformer
transported by*

No leakage from any waste drum has ever been observed. If corrosion of the drum became evident, the wastes were transferred to another drum. All wastes stored on site had been removed and disposed of by late 1983. No PCB material has been stored at the Seneca Street site since inventory removal. Four of the twelve containment trays remain on site and unused; the remaining eight are used to contain non-PCB insulating fluids at Dale Road.

· It has been and will continue to be the policy of NTC to not accept any transformer or other material containing greater than 50 ppm of PCB's.

The goal of this present effort is to attain PCB closure of Seneca Street through site testing to ensure an acceptably low PCB residual concentration at the facility.

II. INVENTORY REMOVAL

As previously mentioned, all PCB-contaminated material had been removed from the site by late 1983. Copies of the Hazardous Waste Manifests comprise Appendix B. SCA Chemical Services of Model City, New York, was responsible for the disposal of the material, which included insulating fluids, cleaning fluids, rags and absorbant material and empty drums.

Four of the twelve secondary containment steel trays remain on site and unused; they are stacked in close proximity to the former storage area. The remaining eight trays are currently used to contain non-PCB insulating fluid in drums at the Niagara Transformer Dale Road site. Testing involving these eight trays is included in a separate closure plan. The Seneca Street site is currently used for general storage.

III. FACILITY DECONTAMINATION

A program of wipe testing is proposed to determine PCB residual concentrations remaining at the storage site. The sampling and analysis, described in Appendix C, is to be performed by ACTS Testing Labs of Buffalo, New York. A total of four initial wipe tests are proposed. Two tests would be taken on the storage area concrete floor, in locations chosen at random. The two remaining tests would be taken in two of the four secondary containment trays, again chosen at random. It is proposed that a Department representative be on site during location selection and sampling.

The testing will yield results in terms of micrograms of PCB per square centimeter of surface area (ug/cm^2). The test results will be compared to a proposed action level to determine subsequent actions. Test results below the action level would be indicative of acceptably low residual PCB levels. Site decontamination would proceed if test results exceed the action level. The proposed action level for this closure is 10 ug/cm^2 .

Site surfaces (the concrete surface and/or containment trays) possessing residual above the action level would be decontaminated by CECOS International of Buffalo, New York (refer to Appendix D). Decontamination would consist of a manual solvent wash of the affected areas. The solvent of choice proposed by CECOS is kerosene. CECOS would be responsible for worker safety during cleaning operations. If the entire floor area must be decontaminated, an estimated 1 to 1½ drums of waste solvent and cleaning materials would be produced. The waste would be disposed of by CECOS according to Environmental Protection Agency and NYSDEC Regulations.

- note: all trays would require decontamination

Following decontamination, repeat wipe testing would be performed on the affected surfaces. If PCB residuals still exceed the action level, a second round of decontamination would occur. Materials, methods and disposal would be identical to the initial decontamination. If a third set of wipe tests determine that the action level is still exceeded, the Department would be approached to discuss supplemental/substitute measures. The site testing and decontamination are graphically depicted in Exhibit V-1.

IV. CLOSURE CERTIFICATION

The activities occurring on site would be monitored for compliance with the approved closure plan. The properly completed closure would be certified by a registered professional engineer, independent from Niagara Transformer Corporation. The certifying engineer for this plan would be Thomas M. Lewandowski, P.E., acting for Nussbaumer & Clarke, Inc., a corporation registered to practice professional engineering and land surveying in the State of New York, Certificate No. 027.

As the approved closure activities are expected to demonstrate that the site will be closed clean, no periodic inspections following acceptance of the closure plan results and documentation are anticipated.

A sample certification statement follows:

STATEMENT

NUSSBAUMER & CLARKE, INC.
CONSULTING ENGINEERS

Action: PCB Storage Site Closure

Client: Niagara Transformer Corporation
1747 Dale Road
P. O. Box 233
Buffalo, New York 14225
Attention: Mr. Fred W. Darby

Site: 1600 Seneca Street

This Statement hereby certifies that the Niagara Transformer Corporation Seneca Street PCB Storage Site Closure was performed in accordance with the approved Site Closure Plan dated March, 1987.

NUSSBAUMER & CLARKE, INC.

By _____
Thomas M. Lewandowski, P.E.
Vice-President-CEO Engineering

Dated:

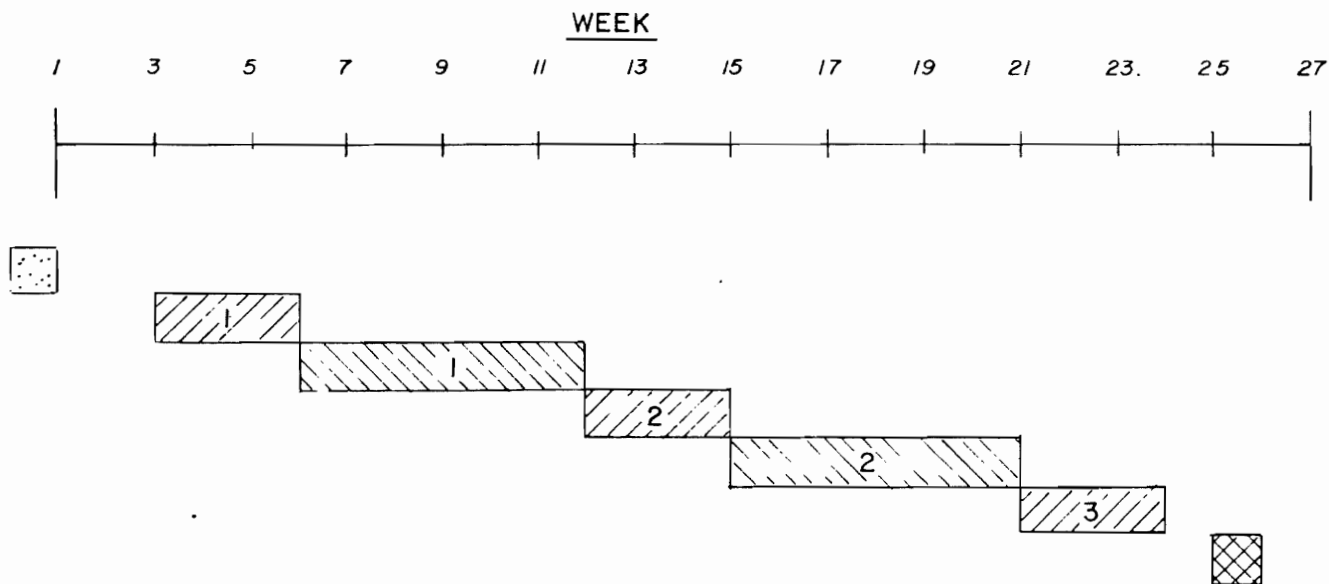
V. CLOSURE SCHEDULE

The following exhibit illustrates the proposed schedule of closure activities. The schedule begins at Week 1, corresponding to the formal closure plan approval by the Department. A two-week period follows, which allows for notification of the testing service (ACTS) and the decontamination service (CECOS), as well as preparation of the subject area. Sample taking, analysis and result reporting would occur in the next three-week period. If the measured PCB levels are below the proposed action level, no further testing or decontamination would occur. The Department would be notified of the results and the closure certification would proceed.





If the measured levels exceed the action level, a six-week decontamination period would immediately follow. The actual decontamination is estimated to require only one working day; the balance of the period is necessary for the decontamination service to obtain approvals and make detailed preparations. Testing would be repeated following the decontamination. If residual PCB levels have been reduced below the action level, notification and certification would proceed.

If residual levels remain above the action level, a second round of decontamination, followed by a third round of testing, would occur. It is anticipated that the residuals would be adequately reduced with two decontaminations. If this is determined to not be the case, the Department would be approached to discuss supplemental/substitute measures.

ACTIVITY



ACTIVITY LEGEND

- | | |
|---|-----------------------|
|  | CLOSURE PLAN APPROVAL |
|  | SITE WIPE TESTING |
|  | SITE DECONTAMINATION |
|  | CLOSURE CERTIFICATION |



NIAGARA TRANSFORMER CORPORATION
SENECA STREET PCB CLOSURE

CLOSURE SCHEDULE

EXHIBIT

V-1

VI. COST ESTIMATE

The cost associated with accomplishing closure is dependent upon the amount of retesting and decontamination that will be necessary. Following are cost estimates for various closure scenarios:

A. Acceptable Levels after Testing Round #1:

Engineering	\$ 540.00
Testing	245.00
Decontamination	0.00
Administration (15%)	118.00
Contingency (20%)	<u>157.00</u>
	\$1,060.00

B. Acceptable Levels after Testing Round #2:

Engineering	\$ 945.00
Testing	440.00
Decontamination	3,250.00
Administration (15%)	695.00
Contingency (20%)	<u>927.00</u>
	\$6,257.00

C. Acceptable Levels after Testing Round #3:

Engineering	\$ 1,350.00
Testing	635.00
Decontamination	6,500.00
Administration (15%)	1,273.00
Contingency (20%)	<u>1,697.00</u>
	\$11,455.00

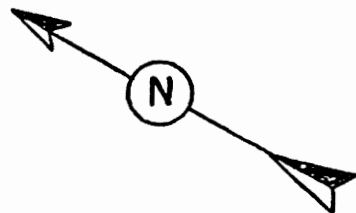
The above scenarios represent total costs. For example, if two rounds of decontamination are necessary, total closure costs are estimated to be \$11,455.00.

Based upon the history of the site, Scenario A, involving one testing round and no required decontamination, is considered to be the most likely outcome of closure.

APPENDIX A

SITE PLAN AND STORAGE AREA LAYOUT

POWER • LIGHTING • LOAD CENTER • OIL IMMERSED • DISTRIBUTION • UNIT SUBSTATION • DRY-AIR COOLED • NON-INFLAMMABLE



30'

PCB
STORAGE

(APPROX. 990 SQ. FT.)

33'

← TO WELDING
SHOP,

YELLOW AISLE
MARKINGS

BUILDING NO. 6

→ TO BLDG. NO 4.

NIAGARA TRANSFORMERS
NIAGARA TRANSFORMER CORP.
BUFFALO, NEW YORK

PCB STORAGE AREA 1600 SENECA ST.

FOR

DATE 1-2-87

BY *FBL*

SK 8974

—

APPENDIX B

HAZARDOUS WASTE MANIFESTS

see cover sheet
for instructions
PLEASE TYPE

STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
HAZARDOUS WASTE MANIFEST

DOCUMENT NO. NY ~~143285~~ 4

Part A:

GENERATOR NAME

Niagara Transformer Corp.

PHONE (main office) EPA ID NO.

716-896-6500 1747 Dalb
RD, Buf

NY 1991290578

SITE ADDRESS

1600 Seneca St., Buffalo, NY 14210

TRANSPORTER NO. 1

PHONE 754-8231

SCA Chemical Services Inc.

716-694-1212

NY 1991290578

SITE ADDRESS

1550 Balmer Rd., Model City NY 14107

TRANSPORTER NO. 2

PHONE

SITE ADDRESS

TREATMENT, STORAGE OR DISPOSAL (TSD) FACILITY

PHONE 754-8231

SCA Chemical Services, Inc.

716-694-1212

NY 1991290578

SITE ADDRESS

1550 Balmer Rd., Model City NY 14107

THIS FORM IS NO. 1 OF A TOTAL OF 1 THE FIRST MANIFEST DOCUMENT NO. IS

NY 1432854

PROPER US DOT SHIPPING NAME	US DOT HAZARD CLASS	UN/NA NUMBER	FORM	NET QUANTITY	UNITS	CONTAINERS NO.	TYPE	EPA HAZ CODE	EPA WASTE TYPE
Waste compound, cleaning liquid, (Perchloroethylene mineral spirits)	Combustible Liquid	NA 1993	01	55	01	1	01	I	U210

SPECIAL HANDLING INSTRUCTIONS INCLUDING CONTAINER EXEMPTION (i.e. IDENTIFICATION OF ADDITIONAL WASTES INCLUDED IN SHIPMENT OF A NONHAZARDOUS NATURE WHICH DO NOT HAVE TO BE MANIFESTED)

GENERATOR'S CERTIFICATION. This is to certify that the herein named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA. The wastes described herein were consigned to the transporter named. The TSD Facility can and will accept the shipment of hazardous waste, and has a valid permit to do so. This shipment also conforms with all applicable State regulations. I certify that the foregoing is true and correct to the best of my knowledge.

GENERATOR'S SIGNATURE

DATE SHIPPED

EXPECTED ARRIVAL DATE

Please type name also

Herman E. Gabel, Jr.

Mo. Day Yr.

Mo. Day Yr.

TRANSPORTER NO. 1 SIGNATURE "To the best of my knowledge the contents of the shipment I have accepted for transport conforms with the description on this manifest."

TRANSPORTER NO. 1 PERMIT NUMBER

DATE RECEIVED

Mo. Day Yr.

CCPY'S Generator—Retained by Generator

See cover sheet
for instructions

STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION

HAZARDOUS WASTE MANIFEST

DOCUMENT NO. NY 313760 7

Part A:

GENERATOR NAME Niagara Transformer Corp.		PHONE 716-896-6500		EPA ID NO. NYD002106177					
SITE ADDRESS 1600 Seneca St., Buffalo, NY		mailing address: 1747 Dale Rd, Buffalo, NY							
TRANSPORTER NO. 1 SCA Chemical Services Inc		PHONE 716-754-8231		14225 NYD049836679					
SITE ADDRESS 1550 BALMER RD MODEL CITY NY 14107									
TRANSPORTER NO. 2		PHONE							
SITE ADDRESS									
TREATMENT, STORAGE OR DISPOSAL (TSD) FACILITY SCA Chemical Services, Inc.		PHONE 716-754-8231		NYD049836679					
SITE ADDRESS 1550 Balmer Rd., Model City, NY 14107									
THIS FORM IS NO. 1 OF A TOTAL OF 1 THE FIRST MANIFEST DOCUMENT NO. IS NY 3137607									
PROPER US DOT SHIPPING NAME	US DOT HAZARD CLASS	UN/NA NUMBER	FORM	NET QUANTITY	UNITS	CONTAINERS NO.	TYPE	EPA HAZ CODE	EPA WASTE TYPE
1 Waste Polychlorinated Biphenyls 50-1000 ppm	ORM-E	2315	01	1786	01	15	01	T	B001
2 Waste Polychlorinated Biphenyls 1000-10000 ppm	ORM-E	2315	01	1350	01	25	01	T	B001
3 Waste Polychlorinated Biphenyls 10000-100000 ppm	ORM-E	2315	01	142	01	1	01	T	B001
4 Waste Polychlorinated Biphenyls over 100000 ppm	ORM-E	2315	01	540	01	10	01	T	B001
5 Waste Polychlorinated contaminated Biphenyls clothing/rags etc	ORM-E	2315	02	916	02	5	01	T	B001
6 Waste Polychlorinated Biphenyls - Other empty drum	ORM-E	2315	02	560	03	14	01	T	B001
SPECIAL HANDLING INSTRUCTIONS INCLUDING CONTAINER EXEMPTION (i.e. IDENTIFICATION OF ADDITIONAL WASTES INCLUDED IN SHIPMENT OF A NONHAZARDOUS NATURE WHICH DO NOT HAVE TO BE MANIFESTED)									
GENERATOR'S CERTIFICATION. This is to certify that the herein named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA. The wastes described herein were consigned to the transporter named. The TSD Facility can and will accept the shipment of hazardous waste, and has a valid permit to do so. This shipment also conforms with all applicable State regulations. I certify that the foregoing is true and correct.									
GENERATOR'S SIGNATURE <i>Herman E. Gabel</i>				DATE SHIPPED 11/01/83 Mo. Day Yr.		EXPECTED ARRIVAL DATE 11/01/83 Mo. Day Yr.			
Please type name also HERMAN E. GABEL JR									
TRANSPORTER NO. 1 SIGNATURE "To the best of my knowledge the contents of the shipment I have accepted for transport conforms with the description on this manifest." <i>[Signature]</i>				TRANSPORTER NO. 1 PERMIT NUMBER NYT110511		DATE RECEIVED 11/01/83 Mo. Day Yr.			

COPY 3 Generator-Retained by Generator

COPY 1+2 mailed to
State 11/2/83

Tear at this Perforation

To Be TYPED by Generator

11-1-83

48-14-1 (4/81)

See cover sheet
for instructions

STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION

PLEASE TYPE

HAZARDOUS WASTE MANIFEST

Part A:

DOCUMENT NO. NY 313761 6

GENERATOR NAME Niagara Transformer Corp.		PHONE 716-896-6500	EPA ID NO. NYD002106177
SITE ADDRESS 1600 Seneca St, Buffalo, NY		Hailing address: 1747 Dale Rd, Buffalo, NY 14225	
TRANSPORTER NO. 1 Transco Tank Trans SVC Inc		PHONE 14101917644501	
SITE ADDRESS 1140 Military Rd Buffalo NY 14217		773-9073	
TRANSPORTER NO. 2		PHONE	
SITE ADDRESS			
TREATMENT, STORAGE OR DISPOSAL (TSD) FACILITY SCA Chemical Services, Inc.		PHONE 716-754-8231	EPA ID NO. NYD049836679
SITE ADDRESS 1550 Balmer Rd., Model City, NY 14107			

THIS FORM IS NO. 1 OF A TOTAL OF 1 THE FIRST MANIFEST DOCUMENT NO. IS NY 3137616

PROPER US DOT SHIPPING NAME	US DOT HAZARD CLASS	UN/NA NUMBER	FORM	NET QUANTITY	UNITS	CONTAINERS NO.	CONTAINERS TYPE	EPA HAZ CODE	EPA WASTE TYPE
Waste Polychlorinated Biphenyls 30-1000 ppm	ORM-E	2315	01	3778	01	1	01	U	01001
Waste Polychlorinated Biphenyls 1000-10000 ppm	ORM-E	2315	01	3778	01	1	01	U	01001
Waste Polychlorinated Biphenyls 10000-100000 ppm	ORM-E	2315	01	3778	01	1	01	U	01001
Waste Polychlorinated Biphenyls over 100000 ppm	ORM-E	2315	01	3778	01	1	01	U	01001
Waste Polychlorinated Biphenyls clothing/rags etc	ORM-E	2315	01	3778	03	1	01	U	01001
Waste Polychlorinated Biphenyls over empty drum	ORM-E	2315	01	3778	03	1	01	U	01001

SPECIAL HANDLING INSTRUCTIONS INCLUDING CONTAINER EXEMPTION (i.e. IDENTIFICATION OF ADDITIONAL WASTES INCLUDED IN SHIPMENT OF A NONHAZARDOUS NATURE WHICH DO NOT HAVE TO BE MANIFESTED)

GENERATOR'S CERTIFICATION. This is to certify that the herein named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA. The wastes described herein were consigned to the transporter named. The TSD Facility can and will accept the shipment of hazardous waste, and has a valid permit to do so. This shipment also conforms with all applicable State regulations. I certify that the foregoing is true and correct.

GENERATOR'S SIGNATURE <i>Herman E. Gabel</i>		DATE SHIPPED 11 01 83 Mo. Day Yr.	EXPECTED ARRIVAL DATE 11 01 83 Mo. Day Yr.
Please type name also HERMAN E. GABEL, JR			
TRANSPORTER NO. 1 SIGNATURE "To the best of my knowledge the contents of the shipment I have accepted for transport conforms with the description on this manifest." <i>Adrian Schmidt</i>		TRANSPORTER NO. 1 PERMIT NUMBER 1091A080	DATE RECEIVED 11 01 83 Mo. Day Yr.

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copy 1 + 2 mailed to
State 11/2/83

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To Be TYPED by Generator

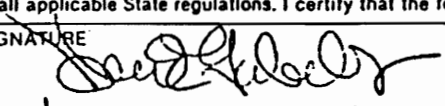
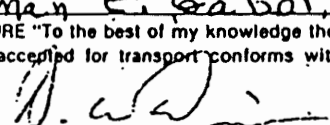
FOR INSTRUCTIONS
PLEASE TYPE

STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION

HAZARDOUS WASTE MANIFEST

DOCUMENT NO. NY 313762 5

Part A:

GENERATOR NAME Niagara Transformer Corp.		PHONE 716-896-6500		EPA ID NO. NYD0002106177					
SITE ADDRESS 1600 Seneca St., Buffalo, NY		MAILING ADDRESS: 1747 Dale Rd, Buffalo, NY							
TRANSPORTER NO. 1 SCA Chemical Services Inc		PHONE 716-754-8231		EPA ID NO. NYD049836679					
SITE ADDRESS 1550 BALMER RD MODEL CITY NY 14107									
TRANSPORTER NO. 2		PHONE							
TE ADDRESS									
TREATMENT, STORAGE OR DISPOSAL (TSD) FACILITY SCA Chemical Services, Inc.		PHONE 716-754-8231		EPA ID NO. NYD049836679					
SITE ADDRESS 1550 Balmer Rd., Model City, NY 14107									
THIS FORM IS NO. <u>1</u> OF A TOTAL OF <u>1</u> THE FIRST MANIFEST DOCUMENT NO. IS NY 3137625									
PROPER US DOT SHIPPING NAME	US DOT HAZARD CLASS	UN/NA NUMBER	FORM	NET QUANTITY	UNITS	CONTAINERS NO.	TYPE	EPA HAZ CODE	EPA WASTE TYPE
1 Waste Polychlorinated Biphenyls 50-1000 ppm	ORM-E	2315	01	432	01	8	01	T	B001
2 Waste Polychlorinated Biphenyls 1000-10000 ppm	(RQ-10/454) ORM-E	(2315)	01	1404	01	126	01	T	B001
3 Waste Polychlorinated Biphenyls 10000-100000 ppm	ORM-E	2315	01	1111	01	1111	01	T	B001
4 Waste Polychlorinated Biphenyls over 100000 ppm	ORM-E	2315	01	442	01	9	01	T	B001
5 Waste Polychlorinated Biphenyls contaminated clothing/rags etc	ORM-E	2315	02	183	03	1	01	T	B006
6 Waste Polychlorinated Biphenyls - Over-empty drum	ORM-E	2315	02	180	03	2	01	T	B009
SPECIAL HANDLING INSTRUCTIONS INCLUDING CONTAINER EXEMPTION (i.e. IDENTIFICATION OF ADDITIONAL WASTES INCLUDED IN SHIPMENT OF A NONHAZARDOUS NATURE WHICH DO NOT HAVE TO BE MANIFESTED)									
240-L Line #1 240-M #2 240-P #4 240-B Line #5 240-C Line #6									
GENERATOR'S CERTIFICATION. This is to certify that the herein named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA. The wastes described herein were consigned to the transporter named. The TSD Facility can and will accept the shipment of hazardous waste, and has a valid permit to do so. This shipment also conforms with all applicable State regulations. I certify that the foregoing is true and correct.									
GENERATOR'S SIGNATURE 				DATE SHIPPED 11/01/83 Mo. Day Yr.		EXPECTED ARRIVAL DATE 11/01/83 Mo. Day Yr.			
Please type name also Herman E. Gabal Jr.				TRANSPORTER NO. 1 SIGNATURE "To the best of my knowledge the contents of the shipment I have accepted for transport conforms with the description on this manifest." 		TRANSPORTER NO. 1 PERMIT NUMBER W491A0811		DATE RECEIVED 11/12/83 Mo. Day Yr.	

COPY 3 Generator-Retained by Generator

COPY 1+2 mailed to State
11/2/83

Tear at this Perforation

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12-21-83

48-14-1 (4/81)

See cover sheet
for instructions

STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION

PLEASE TYPE

HAZARDOUS WASTE MANIFEST

Part A:

DOCUMENT NO. NY 313758 9

GENERATOR NAME Niagara Transformer Corp.	PHONE (Main office - 174) Buffalo, NY 14225 716-896-6500	EPA ID NO. NYD991290578
SITE ADDRESS 1600 Seneca St. Buffalo, NY 14210		
TRANSPORTER NO. 1 SCA Chemical Services Inc.	PHONE 716-754-8231	NYD049836679
SITE ADDRESS 1550 Balmer Rd. Model City, NY 14107		
TRANSPORTER NO. 2	PHONE	
SITE ADDRESS		
TREATMENT, STORAGE OR DISPOSAL (TSD) FACILITY SCA Chemical Services, Inc.	PHONE 716-754-8231	NYD049836679
SITE ADDRESS 1550 Balmer Rd., Model City, NY 14107		

THIS FORM IS NO. 1 OF A TOTAL OF 1 THE FIRST MANIFEST DOCUMENT NO. IS NY 3137589

PROPER US DOT SHIPPING NAME	US DOT HAZARD CLASS	UN/NA NUMBER	FORM	NET QUANTITY	UNITS	CONTAINERS NO.	TYPE	EPA HAZ CODE	EPA WASTE TYPE
1 Waste, compound, cleaning liquid, (Perchloroethylene, mineral spirits)	Combustible liquid	NA1993	01	55	01	1	bh	1	U210
2									
3									
4									
5									
6									

SPECIAL HANDLING INSTRUCTIONS INCLUDING CONTAINER EXEMPTION (i.e. IDENTIFICATION OF ADDITIONAL WASTES INCLUDED IN SHIPMENT OF A NONHAZARDOUS NATURE WHICH DO NOT HAVE TO BE MANIFESTED)

#1 2375-A

GENERATOR'S CERTIFICATION. This is to certify that the herein named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA. The wastes described herein were consigned to the transporter named. The TSD Facility can and will accept the shipment of hazardous waste, and has a valid permit to do so. This shipment also conforms with all applicable State regulations. I certify that the foregoing is true and correct.

GENERATOR'S SIGNATURE <i>Michael C. Padalino</i> Please type name also Michael C. Padalino	DATE SHIPPED 12 20 83 Mo. Day Yr.	EXPECTED ARRIVAL DATE 12 21 83 Mo. Day Yr.
TRANSPORTER NO. 1 SIGNATURE "To the best of my knowledge the contents of the shipment I have accepted for transport conform with the description on this manifest" <i>[Signature]</i>	TRANSPORTER NO. 1 PERMIT NUMBER NY9A081	DATE RECEIVED 12 20 83 Mo. Day Yr.

COPY 3 Generator-Retained by Generator

COPY 1 + 2 MAILED TO STATE
12/24/83

To Be TYPED by Generator

Transporter—FILL OUT

TSD Facility—FILL OUT

Part B: GEN NAME **Niagara Transformer Corp.** 240- GEN EPA ID# **NY10101021106177**

TRANSPORTER NO. 1 SIGNATURE "I certify that I have not tampered with or materially altered the contents of this shipment."		DATE DELIVERED 11/11/83 Mo. Day Yr.	
TRANSPORTER NO. 2 SIGNATURE "To the best of my knowledge the contents of the shipment I have accepted for transport conforms with the description on this manifest."	TRANSPORTER NO.2 PERMIT NUMBER		DATE RECEIVED Mo. Day Yr.
TRANSPORTER NO. 2 SIGNATURE "I certify that I have not tampered with or materially altered the contents of this shipment."		DATE DELIVERED Mo. Day Yr.	
TSD NAME SCA	TSD EPA ID # NY10101021106177	HANDLING METHOD	
TREATMENT STORAGE OR DISPOSAL FACILITY INDICATION OF ANY DIFFERENCES BETWEEN MANIFEST AND SHIPMENT OR LISTING OF REASONS FOR AND DISPOSITION OF REJECTED MATERIALS		1	5022502
		3	5022 4502
		5	0816081
TREATMENT STORAGE OR DISPOSAL FACILITY SIGNATURE "Upon visual inspection, I certify that the contents of this shipment conform with the description on the manifest except those discrepancies noted on this form."	SIGNATURE <i>M. Thompson</i> Please print or type name also	DATE RECEIVED 11/11/83 Mo. Day Yr.	
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.			

DOCUMENT NO. **NY 313762 5**

COPY 3 Generator—Mailed by TSD Facility

Transporter—FILL OUT

TSD Facility—FILL OUT

Part B: GEN NAME **Niagara Transformer Corp.** 240- GEN EPA ID# **NY10101021106177**

TRANSPORTER NO. 1 SIGNATURE "I certify that I have not tampered with or materially altered the contents of this shipment."		DATE DELIVERED 11/11/83 Mo. Day Yr.	
TRANSPORTER NO. 2 SIGNATURE "To the best of my knowledge the contents of the shipment I have accepted for transport conforms with the description on this manifest."	TRANSPORTER NO.2 PERMIT NUMBER		DATE RECEIVED Mo. Day Yr.
TRANSPORTER NO. 2 SIGNATURE "I certify that I have not tampered with or materially altered the contents of this shipment."		DATE DELIVERED Mo. Day Yr.	
TSD NAME SCA	TSD EPA ID # NY10101021106177	HANDLING METHOD	
TREATMENT STORAGE OR DISPOSAL FACILITY INDICATION OF ANY DIFFERENCES BETWEEN MANIFEST AND SHIPMENT OR LISTING OF REASONS FOR AND DISPOSITION OF REJECTED MATERIALS		1	5022502
		3	5024502
		5	0816081
TREATMENT STORAGE OR DISPOSAL FACILITY SIGNATURE "Upon visual inspection, I certify that the contents of this shipment conform with the description on the manifest except those discrepancies noted on this form."	SIGNATURE <i>M. Thompson</i> Please print or type name also	DATE RECEIVED 11/11/83 Mo. Day Yr.	
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.			

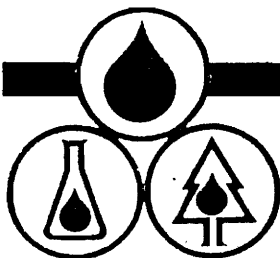
DOCUMENT NO. **NY 313760 7**

COPY 3 Generator—Mailed by TSD Facility

In case of emergency or spill immediately call the National Response Center
(800) 424-2663 or (202) 261-4900.

APPENDIX C

SITE TESTING



CECOS
INTERNATIONAL INC.

2321 Kenmore Avenue
Buffalo NY 14207
(716) 873-4200
TLX No 70-1533
CECOS Buf

March 16, 1987

Nussbaumer & Clarke, Inc.
310 Delaware Avenue
Buffalo, New York 14202

ATTENTION: Mr. Dave Albers

RE: Niagara Transformer Corp.
PCB Storage Site Cleaning

Dear Mr. Albers:

CECOS International, Inc. is pleased to submit this estimate of cleaning costs for the Seneca Street and Dale Road Niagara Transformer locations.

PLANNING ASSUMPTIONS

1. All work areas will be cleared of equipment and debris.
2. This estimate is for solvent swabbling of the floor areas only.

COST

The following cost is estimated and is for budget purposes only. CECOS does not guarantee decontamination levels with one cleaning.

Seneca Street	Lump Sum \$3,250.00
Dale Road	Lump Sum \$6,570.00

This price includes disposal of five (5) drums of solid PCB debris (rags and pads). The labor and equipment is estimated for five (5) working days.

We hope that this meets your requirements.

If we may be of further assistance, please feel free to contact us.

Sincerely,

DANIEL O. HOFFNER
Estimator

RECEIVED

MAR 18 1987

NUSSBAUMER & CLARKE, INC.

DOH/cm
cc: F. Virginia

