ENVISION ENVIRONMENTAL, INC.

PHASE I ENVIRONMENTAL SITE ASSESSMENT REPORT

of

REXAM DSI INC.
BRIDGE STREET
BROWNVILLE, NY 13615

for

REXAM INC.
CHARLOTTE, NC 28209

Prepared by:

Joseph Zgurzynski, CHMM, CIH, CEA
Abraham Platt
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ENVISION ENVIRONMENTAL, INC.

August 2000

ENVISION Project ID 1500.REX

VOLUME II of II

21 Priscilla Lane, Howell, NJ 07731 • Phone: 732-886-1664 Fax: 732-886-2925

INTRUSIVE INVESTIGATION REPORT
DECORATIVE SPECIALTIES INTERNATIONAL, INC.
BROWNVILLE, NEW YORK
2/22/93

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INTRUSIVE INVESTIGATION REPORT
DECORATIVE SPECIALTIES INTERNATIONAL, INC.
BROWNVILLE, NEW YORK
2/22/93

I. INTRODUCTION

On November 30, 1992, INTEX initiated an intrusive investigation in the area of a reported fuel oil release at Decorative Specialties International, Inc. (DSI) to assist in determining the extent of residual soil and/or groundwater contamination. The release of fuel oil at the site was detected on October 10, 1991, when petroleum products were observed in the area of a drainage culvert. The source of the released petroleum products was identified as a leaking fill pipe connected to a fuel oil (#4 or #6) storage tank. The tank and piping were located above a series of archways at the north side of the facility. Petroleum impacted soil was removed from the area of the eastern most archway and staged for disposal. Following the removal of petroleum impacted soils, a drainage culvert and piping were steam cleaned. During a reinspection of the culvert petroleum products were again observed to be present in the culvert.

On November 30, 1992 and December 1, 1992, a small tracked excavator was used to remove overburden soil and expose the bedrock and any residual contamination to the depth of the water table in the area of the reported release.

II. SITE DESCRIPTION

The DSI facility is located in Brownville, New York adjacent to the Black River. At this location, the Black River has cut a steep sided channel through the limestone bedrock. A small lagoon is present on the north bank of the river. A culvert which drains areas to the north and east of the DSI facility discharges to the lagoon.

The bedrock at the site is reported to consist of members of the Black River Group. The Black River Group was deposited during the Middle Ordovician period and consists of the Chaumont, Lowville and Sugar River limestones. The Chaumont, Lowville and Sugar River limestones are dense, blocky dark gray limestones. Small scale karst features including dissolution along bedding planes, joints and fractures have developed in the bedrock.

III. INTRUSIVE INVESTIGATION

INTEX supervised the installation of three (3) inspection pits at the DSI facility. The inspection pits were installed in the area of a reported discharge of fuel oil to determine the vertical and lateral extent of residual soil contamination and determine what impact, if any, the discharge has had on the groundwater quality at the site.

A. Installation of Test Pit #1

Test Pit #1 was located immediately north of the eastern most arch in the facility wall. The archway was the location where petroleum was first observed discharging. The location of Test Pit #1 is diagramed in Figure 1.

The excavation of Test Pit #1 commenced using a small tracked excavator. The excavator, operated by an OSHA trained operator supplied by Northeast Environmental Services, Inc. (NES), was used to remove overburden soils from the area of the eastern most arch. The overburden was visually inspected for the presence of petroleum. All visually "clean" soil was staged adjacent to the excavation. The overburden in the area of the arch was observed to be a medium grained sand. This was inconsistent with the overburden material observed in the near vicinity of the excavation. At a depth of 1.25 ft. below the surface, a layer of medium grained sand, approximately 0.25 ft. thick, was observed to be saturated with petroleum. This saturated soil was located immediately above the limestone bedrock. At the sand/bedrock interface, oil absorbant pads similar to those used at petroleum spill sites were observed. The pads, were reportedly placed by the previous contractor in an attempt to contain any petroleum migration. A field screening sample was collected for analysis using the Hanby analytical technique from the top of the sand layer. The Hanby analysis results indicated the presence of 600 parts per million (ppm) of petroleum compounds identified as fuel oil (see Figure 2).

In an effort to define the lateral extent of contamination, INTEX directed that the excavation be extended to the north toward a drainage culvert known to exist in the vicinity of the archway.

The excavation extended outward from the archway following an area previously cleared of excessive overburden material. Excavation continued vertically until bedrock was encountered. The limestone bedrock formed several ledges that droped vertically away from the building. The surface of the limestone was stained and coated with a thick oily film.

At a depth of approximately 5.5 feet, the water table was encountered. The water table appeared to be perched above the limestone bedrock. The groundwater entering the excavation flowed slowly. A heavy to moderate sheen and droplets of a dark oily substance (free product) were observed on the water's upper surface. Excavation ceased at the top of the water table to prevent the additional spread of contamination. The excavation extended approximately 29 feet from the corner of the archway. A second sample was collected for field screening analysis from the soils immediately above the water table. The sample was analyzed using the Hanby field analysis method. The Hanby analysis results indicated the presence of greater than 1,000 ppm of petroleum compounds identified as fuel oil existed in the soil.

B. Installation of Test Pit #2

Test Pit #2 was installed forty-four feet (44') west of the east corner of the archway investigated by Test Pit #1. Test Pit #2 was installed to investigate the lateral extent of subsurface petroleum contamination at the site. A large quantity of overburden consisting of bricks, concrete, metal piping and soil was removed from the area of the test pit. All overburden was field screened for the presence of petroleum compounds. Limestone bedrock was encountered at a depth of 5.0 feet below the floor of the archway adjacent to Test Pit #2. No staining, sheen or petroleum odor was observed on the bedrock surface or in the soil immediately above the bedrock. The excavation was extended outward from the archway toward the north.

Limestone bedrock was encountered at a depth of approximately 7.25 ft. below the floor of the archway. No staining, sheen or petroleum odor was observed on the bedrock surface or in the soil immediately above the bedrock. Excavation was terminated at a distance of fifteen feet (15') north of the building.

C. Installation of Test Pit #3

Test Pit #3 was installed surrounding the twelve (12) inch diameter galvanized steel drainage culvert piping to evaluate if petroleum products were migrating along the exterior of the culvert pipe to the Black River.

The overburden soils were removed and inspected for signs of petroleum contamination. The galvanized drainage culvert was encountered at a depth of eight inches (8") below the ground surface. Soil was removed along each side to below the bottom of the pipe and inspected for signs of petroleum contamination. No staining, sheen or petroleum odor was detected in the soils surrounding the piping. Excavation ceased and the test pit carefully backfilled so as not to disturb the drain system piping.

IV. SUMMARY

On November 30, 1992, INTEX supervised an intrusive investigation in the area where fuel oil was reported to be discharged to the environment from leaking fill pipes at the Decorative Specialties International, Inc. facility in Brownville, New York. The intrusive investigation was conducted to more accurately define the vertical and lateral extent of petroleum contaminated soils and/or groundwater at the site.

No petroleum contamination was observed in Test Pits #2 and #3 at the site (see Figure 1, pg. 5).

During the installation of Test Pit #1, INTEX encountered a thin layer of petroleum soaked soil immediately above the limestone bedrock. At a greater distance from the facility wall and at greater depth, the groundwater table was encountered. A sheen and droplets of a dark oily substance was observed on the upper surface of the water table.

Based on the field observations in the vicinity of Test Pit #1 and conversations with DSI personnel regarding their daily observations at the site, INTEX concludes that petroleum compounds have migrated to a stone lined drainage culvert located immediately north of Test Pit #1 along the upper surface of the groundwater table and the surface of the limestone bedrock at the site. INTEX also concludes that petroleum contaminants have not migrated westward for a substantial distance based on the results of the installation of Test Pit #2. Test Pit #3 suggests that the exterior of the drainage culvert is not acting as a conduit to assist the migration of petroleum compounds from the source.

V. RECOMMENDATIONS

INTEX submits the following recommendations regarding the Decorative Specialties International, Inc. (NYSDEC Spill #9107640) site:

1) A groundwater collection and treatment system should be installed in the area of Test Pit #1. Initially, INTEX recommends the collection system be in the form of a barrier to prevent the outward migration of petroleum towards the culvert. Drainage piping should be installed to collect groundwater and transport it to a large catch basin where a water level regulated pump would force the water through a treatment system. INTEX can be of assistance to DSI regarding the installation of the above described system and in obtaining those permits and approvals required to comply with applicable NYSDEC regulations.

2) During the installation of the above described collection and treatment system, INTEX recommends that all petroleum contaminated soil encountered be excavated and properly staged. An investigation should be conducted to determine the most cost effective method of properly treating/disposing of the petroleum contaminated soil.

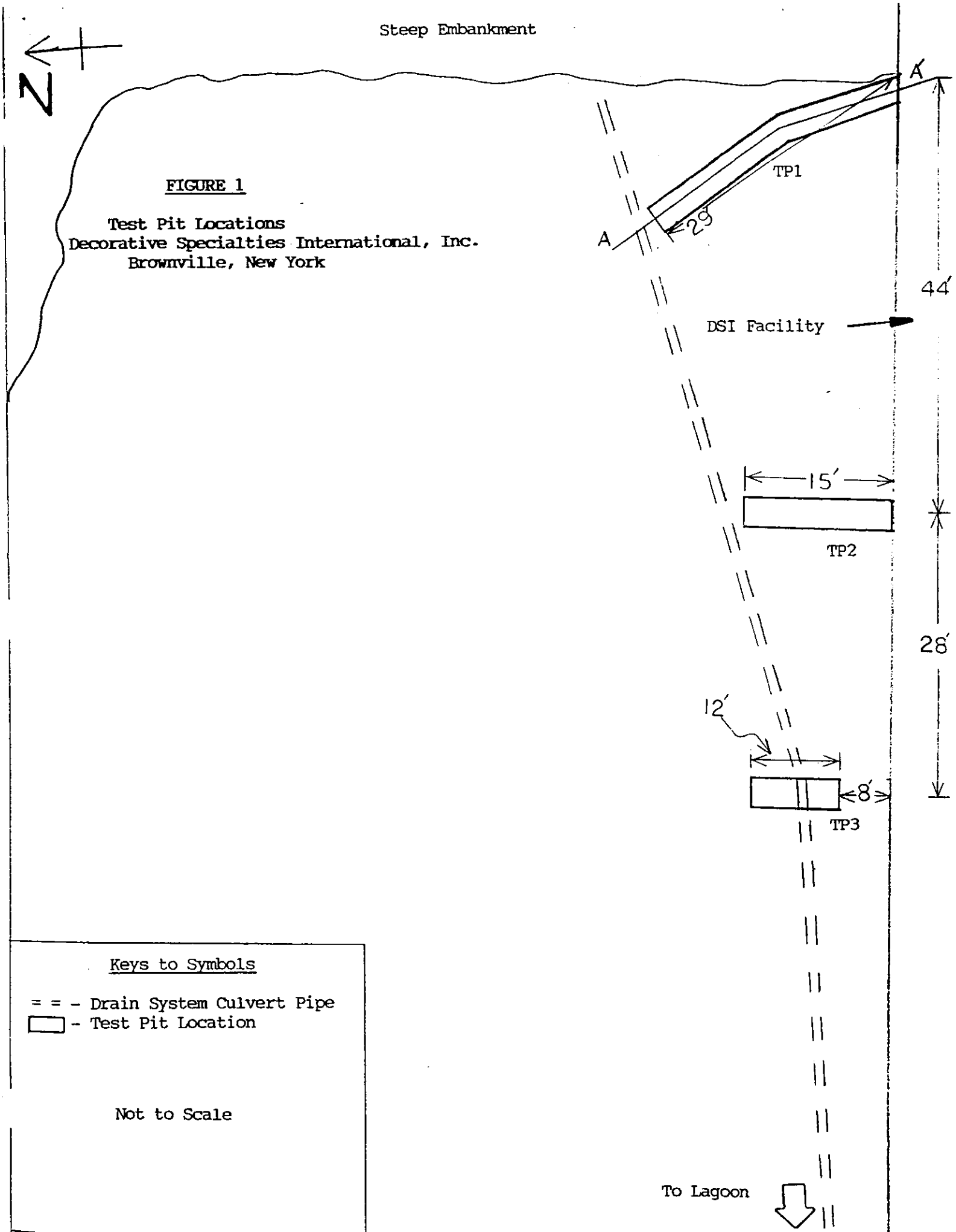
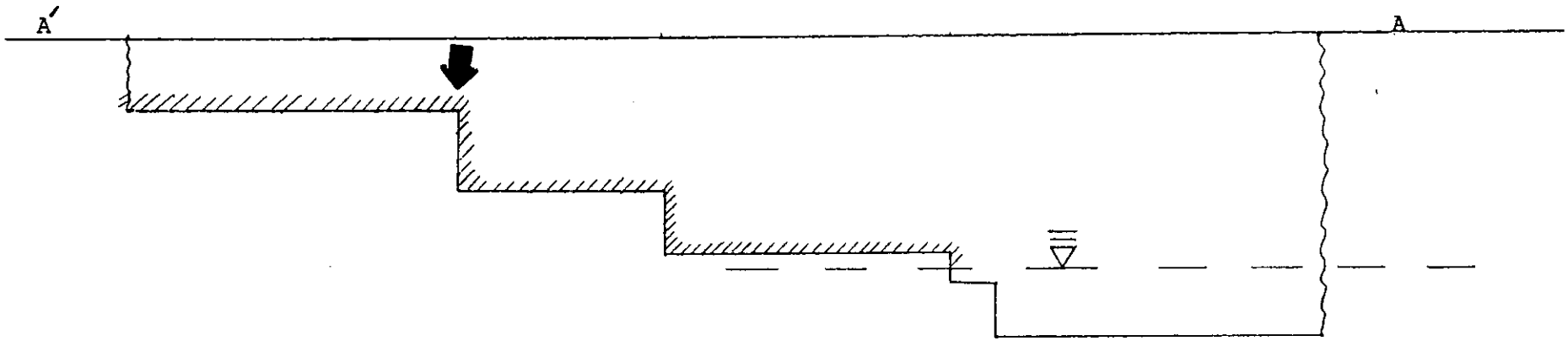


FIGURE 1

Test Pit Locations
Decorative Specialties International, Inc.
Brownville, New York

FIGURE 2

CROSS SECTION OF TEST PIT 1
DECORATIVE SPECIALTIES INTERNATIONAL, INC.
BROWNVILLE, NEW YORK



Keys to Symbols

- Groundwater Table
- Zone of Contaminated Soil/ Stained Bedrock
- Field Screening Sample Collected

INTERNATIONAL EXPLORATION

EST. 1973

MARGUERITE DRIVE WEST
RR #3, BOX 8B
CANASTOTA, NEW YORK 13032
TELEPHONE: 315-697-3823
TELEFAX: 315-697-3867

BRANCH OFFICES: (3)
DOYLESTOWN, PENNSYLVANIA
215-345-5586
NEWARK, NEW JERSEY
201-589-3650

INTEX-92\DSI010

October 19, 1992

Faxed 10/19/92

Ms. Sandra Mercuri
Technical Superintendent
Decorative Specialties International, Inc.
Bridge Street
Brownville, NY 13615

RE: Preliminary Sampling Investigation Report
Decorative Specialties International, Inc.
Brownville, New York

Dear Ms. Mercuri:

Enclosed please find the above referenced report regarding the sampling conducted at the Decorative Specialties International, Inc. (DSI) facility in Brownville, New York.

If you have any questions, please contact this office.

Sincerely,
INTEX, INC.

Richard E. Jones
Geologist

REJ:km
Enc.

cc: Luke McKenney, INTEX
File

PRELIMINARY SAMPLING INVESTIGATION
DECORATIVE SPECIALTIES INTERNATIONAL, INC.
BROWNVILLE, NEW YORK
10/19/92

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PRELIMINARY SAMPLING INVESTIGATION
DECORATIVE SPECIALTIES INTERNATIONAL, INC.
BROWNVILLE, NEW YORK
10/19/92

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PRELIMINARY SAMPLING INVESTIGATION
DECORATIVE SPECIALTIES INTERNATIONAL, INC.
BROWNVILLE, NEW YORK
10/19/92

INTRODUCTION

On September 17, 1992, INTEX completed the collection of water and sediment samples from the area of the lagoon located adjacent to the Decorative Specialties International, Inc. (DSI) facility in Brownville, New York. The samples were collected to more accurately characterize and evaluate the source of a sheen observed on the water's surface in the lagoon.

SITE LOCATION

The DSI facility is located adjacent to the Black River in Brownville, New York. At this location, the Black River has cut a steep sided gorge through the limestone bedrock. A small lagoon is located adjacent to the facility on the north side of the river. Adjacent to the lagoon and facility is an area of suspected fill and a large (12-14") stormwater drainage system outfall. Oil absorbant booms were placed by DSI personnel to contain any petroleum that reportedly is discharged on occasion through the conduit.

PRE-SAMPLING ACTIVITIES

Prior to collecting the water and sediment samples, INTEX performed calibration checks on all monitoring and sampling equipment in compliance with quality assurance and quality control standards established by the manufacturer. A HnU photoionization detector was checked for calibration accuracy using a standard isobutylene gas of known concentration. An Oakton water test meter was calibrated for pH and conductivity using standard test solutions (pH 4, pH 7 and conductivity 1413vs) supplied by manufacturer. The probes of the Oakton water test meter were stored in distilled (analyte free) water to maintain calibration accuracy between analyses.

SAMPLE LOCATIONS

Three sampling locations were selected in the area of the lagoon by the INTEX sampling team. The sampling locations are diagramed in Figure 1 (pg. 5).

Sampling Location SW1/SD1 - Sampling Location SW1/SD1 was located in the area south of a large stormwater drain outfall. Sample SW1 was collected from surface water approximately 1.5 feet from the shore. Sample SD1 was collected from the coarse sand gravel in an area containing visual evidence that the soils have been affected by the stormwater outfall.

Sampling Location SW2/SD2 - Sampling Location SW2/SD2 was located directly west of the stormwater drain outfall. Sample SW2 was collected from surface water approximately 2.0 feet from the shore. Sample SD2 was collected from the coarse sandy gravel along the shore of the lagoon where visual evidence indicated the stormwater discharge had contacted the soils.

Sampling Location SW3/SD3 - Sampling Location SW3/SD3 was located on the east side of the concrete head wall approximately 150 to 200 feet west of the stormwater drain outfall. Sample SW3 was collected approximately 1.0 feet from shore. Sample SD3 was collected from the medium grained silty sand at the water's edge.

Sampling Location SW4 - Sample SW4 was collected from the discharge point of a spring flowing through the limestone bedrock beneath the facility. The discharge point is located approximately fifty (50) feet west of the Route 12E bridge near the bottom (approximately five (5) feet above the water level) of the steep limestone gorge created by the Black River.

SAMPLE COLLECTION

The following methods were used to collect the surface water and sediment samples at the DSI facility:

Surface Water Samples

Samples of surface waters were collected from the area of the lagoon and bedrock spring. The samples were collected in the following manner and transported to a New York State approved laboratory for analysis:

1) Each sampling area was screened for the presence of volatile organic compounds using the HnU photoionizing detector.

2) The Oakton water test meter probes were inserted into the surface water and the water analyzed for the following parameters:

   - pH
   - Temperature
   - Conductivity

   The results of the field analyses were recorded in the project field book.

3) The probes of the water test meter were decontaminated using a triple distilled water rinse. The meter probes were stored in a distilled water bath between analyses.

4) A laboratory decontaminated one (1) quart amber glass sample container was lowered into the water at each sampling location so that only the upper surface of the water was allowed to enter the container.

5) The lid was placed on the container and the sample placed in the cooler provided for the storage and transport of the samples to the laboratory.

6) Chain of custody documentation was completed and placed in the cooler with the samples.

SEDIMENT SAMPLES

Sediment samples were collected from the area of the lagoon at the site. The samples were collected in the following manner and transported to a New York State approved laboratory for analysis:

1) Each sampling area was screened for the presence of volatile organic compounds using the HnU photoionizing detector.

2) A decontaminated stainless steel spoon was used to collect representative sediments from a depth of up to eight (8) inches below the surface.

3) The sediments were placed immediately into a laboratory decontaminated one (1) pint glass sample container. The lid was placed onto the sample container and the sample placed into the cooler provided for the storage and transport of the samples.

4) The excavation from where the sample was collected was scanned for the presence of volatile organic compounds using the HnU photoionizing detector. The field screening results were recorded in the project field book.

5) Chain of custody documentation was completed and placed in the cooler with the samples.

FIELD OBSERVATIONS

INTEX, during the collection of the sediment and surface water samples, recorded several field observations made by the sampling team. During the collection of surface water samples from the area of the lagoon, INTEX noted that oil absorbant booms had been placed across the outlet of the lagoon. A sheen (approximately 6-inch diameter) was observed in the area enclosed by the oil absorbant booms. The most dense concentration of the sheen was located in the area surrounding the oil absorbant booms.

Sediments in the area of the lagoon were composed of brown to dark brown medium to coarse grained sand gravel. No staining of the sediments was observed during the investigation. The area surrounding the lagoon exhibited evidence that the area had been filled. Concrete slabs and debris were observed in the water and along the shoreline of the lagoon adjacent to the DSI facility.

Conversations with DSI personnel have indicated that black droplets have been observed discharging from the storm drain outfall to the lagoon. A discharge of petroleum compounds was previously reported in an area drained by the stormwater drain.

SAMPLE ANALYSIS

The samples of surface water and sediments collected from the DSI facility were analyzed at a New York State approved laboratory for the following parameters:

- Total Petroleum Hydrocarbons (NYSDOH 310-13)

ANALYSIS RESULTS

The results of the field screening and field analysis conducted at the DSI facility have been summarized in Table 1 (pg. 3).

The laboratory results for the surface water and sediment samples collected at the DSI facility have been summarized in Table 2 (pg. 4). The Laboratory Results Report is included on Page 6.

TABLE 1

FIELD SCREENING ANALYSIS RESULTS
DECORATIVE SPECIALTIES INTERNATIONAL, INC.
BROWNVILLE, NEW YORK

Sample Location	pH	Temperature	Conductivity (uS)
SW-1	6.8	21.1°	187
SW-2	6.8	20.8°	162
SW-3	6.6	21.0°	121
SW-4	7.0	22.0°	487
		Volatile Organic Compounds (ppm)	
SD-1	ND		
SD-2	ND		
SD-3	ND		

TABLE 2

LABORATORY RESULTS SUMMARY
DECORATIVE SPECIALTIES INTERNATIONAL, INC.
BROWNVILLE, NEW YORK

Sample Location	Total Petroleum Hydrocarbons (NYSDOH 310-13)
SW-1	ND (<10.0 ug/l)
SW-2	ND (<10.0 ug/l)
SW-3	ND (<10.0 ug/l)
SW-4	ND (<10.0 ug/l)
SD-1	ND (<10.0 ug/kg)
SD-2	ND (<10.0 ug/kg)
SD-3	ND (<10.0 ug/kg)

DISCUSSION OF RESULTS

Field observations and conversations with DSI employees indicate that petroleum compounds may be discharging to the area of the lagoon from the stormwater drainage system. Samples collected from the surface waters in the area of the lagoon were analyzed for conductivity. Field analysis results indicate that relatively low concentrations of dissolved ions exist in the lagoon surface water.

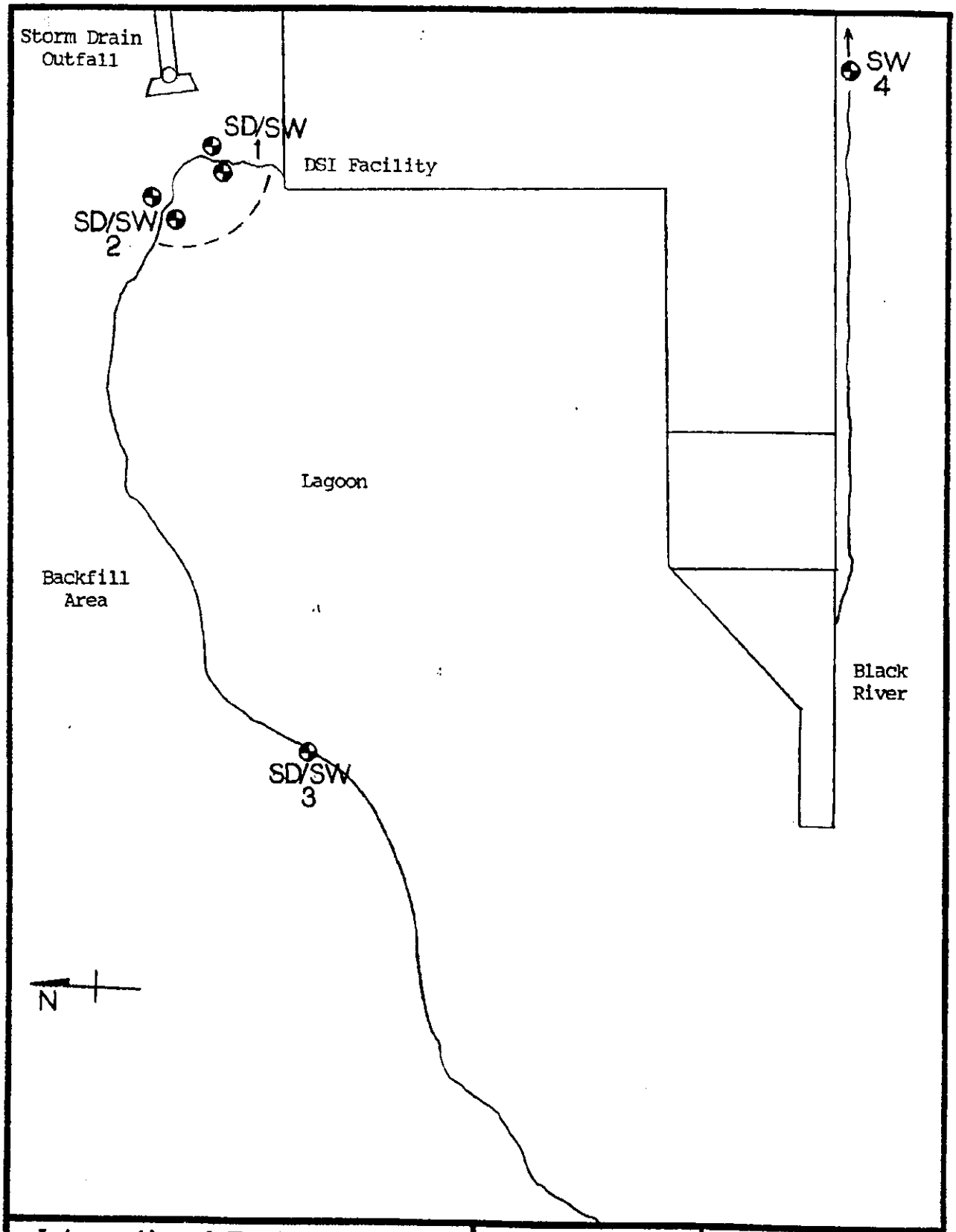
Laboratory results obtained from surface water samples collected from the area of the lagoon and bedrock spring have indicated that petroleum hydrocarbons were not detected in the lagoon surface water at concentrations above the laboratory quantitative limit of 10.0 ug/l.

The possibility exists that the large volume of water contained in the lagoon has diluted the volume of petroleum compounds discharged through the stormwater drainage system to a concentration of less than 10.0 ug/l.

Petroleum hydrocarbons were not detected at concentrations at or above 10.0 ug/kg in the sediment samples collected in the area of the lagoon. The sediment samples (SD-1 and SD-2) were collected in areas visually impacted by the stormwater discharge. The laboratory results indicate that petroleum products, if discharged in the past, have not yet accumulated in the sediments sampled to concentrations above 10.0 ug/kg. The continued discharge of petroleum products from the stormwater drain system (if any) may allow the accumulation of petroleum to levels of concern in the sediments at the site.

RECOMMENDATIONS

The origin of the sheen and/or reported petroleum discharge from the stormwater drainage system should be determined. An intrusive investigation should be conducted to determine if petroleum compounds from the reported discharge have migrated to the area of the stormwater drainage system. This investigation should be conducted to prevent the accumulation of petroleum compounds to levels of concern in the area of the stormwater outfall and lagoon. INTEX has previously (August 10, 1992) forwarded a scope of work and cost estimate proposal to complete the intrusive investigation at the DSI facility.



International Exploration, Inc.	Client: DSI, Inc.	Figure #: 1
Sampling Location Location of Oil Absorbant Booms	Location: Brownville New York	Project #:
	Date: 10/15/92	Scale: Not to Scale

BUCK ENVIRONMENTAL LABORATORIES INC.
ASP-QUALITY ENVIRONMENTAL ANALYSIS
3845 ROUTE 11 SOUTH, CORTLAND, N.Y. 13045
P.O. BOX 5150 607-753-3403

Report Date: 10/05/92

Lab Log Number: 9209206

LABORATORY REPORT

Client: **INTEX**

Site: DSI

Date of Sample: 9/17/92 by K.H., R.J., Received 9/22/92

Samples: Water & Soil

Method:
- o Flame Ionization Detector, and/or GC/MS (75 degrees for 4 minutes, 8 degrees/min to 310 degrees C)
- o N2 purge at 25ml/min - calibrated against toluene standard (unless otherwise noted)
- o Adapted from NYSDOH 310-13 methodology

TOTAL PETROLEUM HYDROCARBON QUANTITATION

SW-1	ND (<10.0 ug/L)
SW-2	ND (<10.0 ug/L)
SW-3	ND (<10.0 ug/L)
SW-4	ND (<10.0 ug/L)
SD-1	ND (<10.0 ug/kg)
SD-2	ND (<10.0 ug/kg)
SD-3	ND (<10.0 ug/kg)

ND - None detected greater than detection limits noted.

This analysis is certified as conforming to generally accepted laboratory practices and requirements of the New York State Health Department ELAP program.

John H. Buck, P.E.
Laboratory Director

NYS ELAP CERT 10795

APPENDIX 30

1992 No. 6 Fuel Oil Release Information

NYS DEPARTMENT OF ENVIRONMENTAL CONSERVATION
317 Washington Street, Watertown, NY 13601
315-785-2513

John P. Cahill
Acting Commissioner

February 26, 1997

Mr. Steve Lang
REXAM DSI
Bridge Street
Brownville, New York 13615

RE: SPILL #9107640, REXAM DSI
BROWNVILLE (V), JEFFERSON COUNTY

Dear Mr. Lang:

At this time, the Department will not require any additional investigation or remediation as a result of this spill.

However, if any additional investigation or remediation is needed in the future, then Rexam DSI would be held responsible.

Thank you for your cooperation in resolving this matter.

Sincerely,

Kenneth Netto
Env. Engineering Technician I
Region 6 - Spill Unit

KN:ebt

INTEX
EST. 1973

INTERNATIONAL EXPLORATION

MARGUERITE DRIVE WEST
RR #3, BOX 88
CANASTOTA, NEW YORK 13032
TELEPHONE: 315-697-3733
TELEFAX: 315-697-3291

BRANCH OFFICES:
- NEW JERSEY
- PENNSYLVANIA
- CONNECTICUT
- VERMONT
- ILLINOIS
- CALIFORNIA

INTEX-93\DSI002

February 22, 1993

Ms. Sandra A. Mercuri
Decorative Specialties International, Inc.
Bridge Street
Brownville, NY 13615

RE: Intrusive Investigation Report
Decorative Specialties International, Inc.
NYSDEC Spill #9107640

Dear Ms. Mercuri:

Enclosed please find the Intrusive Investigation Report regarding the investigation conducted in the area of the archway and petroleum discharge at the Decorative Specialties International, Inc. facility in Brownville, New York.

If you have any questions, please contact this office.

Sincerely,
INTEX, INC.

Richard E. Jones
Project Geologist

REJ:km
Enc.

cc: Luke McKenney, INTEX

INTRUSIVE INVESTIGATION REPORT
DECORATIVE SPECIALTIES INTERNATIONAL, INC.
BROWNVILLE, NEW YORK
2/22/93

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DECORATIVE SPECIALTIES INTERNATIONAL, INC.
BROWNVILLE, NEW YORK
2/22/93

I. INTRODUCTION

On November 30, 1992, INTEX initiated an intrusive investigation in the area of a reported fuel oil release at Decorative Specialties International, Inc. (DSI) to assist in determining the extent of residual soil and/or groundwater contamination. The release of fuel oil at the site was detected on October 10, 1991, when petroleum products were observed in the area of a drainage culvert. The source of the released petroleum products was identified as a leaking fill pipe connected to a fuel oil (#4 or #6) storage tank. The tank and piping were located above a series of archways at the north side of the facility. Petroleum impacted soil was removed from the area of the eastern most archway and staged for disposal. Following the removal of petroleum impacted soils, a drainage culvert and piping were steam cleaned. During a reinspection of the culvert petroleum products were again observed to be present in the culvert.

On November 30, 1992 and December 1, 1992, a small tracked excavator was used to remove overburden soil and expose the bedrock and any residual contamination to the depth of the water table in the area of the reported release.

II. SITE DESCRIPTION

The DSI facility is located in Brownville, New York adjacent to the Black River. At this location, the Black River has cut a steep sided channel through the limestone bedrock. A small lagoon is present on the north bank of the river. A culvert which drains areas to the north and east of the DSI facility discharges to the lagoon.

The bedrock at the site is reported to consist of members of the Black River Group. The Black River Group was deposited during the Middle Ordovician period and consists of the Chaumont, Lowville and Sugar River limestones. The Chaumont, Lowville and Sugar River limestones are dense, blocky dark gray limestones. Small scale karst features including dissolution along bedding planes, joints and fractures have developed in the bedrock.

III. INTRUSIVE INVESTIGATION

INTEX supervised the installation of three (3) inspection pits at the DSI facility. The inspection pits were installed in the area of a reported discharge of fuel oil to determine the vertical and lateral extent of residual soil contamination and determine what impact, if any, the discharge has had on the groundwater quality at the site.

A. Installation of Test Pit #1

Test Pit #1 was located immediately north of the eastern most arch in the facility wall. The archway was the location where petroleum was first observed discharging. The location of Test Pit #1 is diagramed in Figure 1.

The excavation of Test Pit #1 commenced using a small tracked excavator. The excavator, operated by an OSHA trained operator supplied by Northeast Environmental Services, Inc. (NES), was used to remove overburden soils from the area of the eastern most arch. The overburden was visually inspected for the presence of petroleum. All visually "clean" soil was staged adjacent to the excavation. The overburden in the area of the arch was observed to be a medium grained sand. This was inconsistent with the overburden material observed in the near vicinity of the excavation. At a depth of 1.25 ft. below the surface, a layer of medium grained sand, approximately 0.25 ft. thick, was observed to be saturated with petroleum. This saturated soil was located immediately above the limestone bedrock. At the sand/bedrock interface, oil absorbant pads similar to those used at petroleum spill sites were observed. The pads, were reportedly placed by the previous contractor in an attempt to contain any petroleum migration. A field screening sample was collected for analysis using the Hanby analytical technique from the top of the sand layer. The Hanby analysis results indicated the presence of 600 parts per million (ppm) of petroleum compounds identified as fuel oil (see Figure 2).

In an effort to define the lateral extent of contamination, INTEX directed that the excavation be extended to the north toward a drainage culvert known to exist in the vicinity of the archway.

The excavation extended outward from the archway following an area previously cleared of excessive overburden material. Excavation continued vertically until bedrock was encountered. The limestone bedrock formed several ledges that droped vertically away from the building. The surface of the limestone was stained and coated with a thick oily film.

At a depth of approximately 5.5 feet, the water table was encountered. The water table appeared to be perched above the limestone bedrock. The groundwater entering the excavation flowed slowly. A heavy to moderate sheen and droplets of a dark oily substance (free product) were observed on the water's upper surface. Excavation ceased at the top of the water table to prevent the additional spread of contamination. The excavation extended approximately 29 feet from the corner of the archway. A second sample was collected for field screening analysis from the soils immediately above the water table. The sample was analyzed using the Hanby field analysis method. The Hanby analysis results indicated the presence of greater than 1,000 ppm of petroleum compounds identified as fuel oil existed in the soil.

B. Installation of Test Pit #2

Test Pit #2 was installed forty-four feet (44') west of the east corner of the archway investigated by Test Pit #1. Test Pit #2 was installed to investigate the lateral extent of subsurface petroleum contamination at the site. A large quantity of overburden consisting of bricks, concrete, metal piping and soil was removed from the area of the test pit. All overburden was field screened for the presence of petroleum compounds. Limestone bedrock was encountered at a depth of 5.0 feet below the floor of the archway adjacent to Test Pit #2. No staining, sheen or petroleum odor was observed on the bedrock surface or in the soil immediately above the bedrock. The excavation was extended outward from the archway toward the north.

Limestone bedrock was encountered at a depth of approximately 7.25 ft. below the floor of the archway. No staining, sheen or petroleum odor was observed on the bedrock surface or in the soil immediately above the bedrock. Excavation was terminated at a distance of fifteen feet (15') north of the building.

C. Installation of Test Pit #3

Test Pit #3 was installed surrounding the twelve (12) inch diameter galvanized steel drainage culvert piping to evaluate if petroleum products were migrating along the exterior of the culvert pipe to the Black River.

The overburden soils were removed and inspected for signs of petroleum contamination. The galvanized drainage culvert was encountered at a depth of eight inches (8") below the ground surface. Soil was removed along each side to below the bottom of the pipe and inspected for signs of petroleum contamination. No staining, sheen or petroleum odor was detected in the soils surrounding the piping. Excavation ceased and the test pit carefully backfilled so as not to disturb the drain system piping.

IV. SUMMARY

On November 30, 1992, INTEX supervised an intrusive investigation in the area where fuel oil was reported to be discharged to the environment from leaking fill pipes at the Decorative Specialties International, Inc. facility in Brownville, New York. The intrusive investigation was conducted to more accurately define the vertical and lateral extent of petroleum contaminated soils and/or groundwater at the site.

No petroleum contamination was observed in Test Pits #2 and #3 at the site (see Figure 1, pg. 5).

During the installation of Test Pit #1, INTEX encountered a thin layer of petroleum soaked soil immediately above the limestone bedrock. At a greater distance from the facility wall and at greater depth, the groundwater table was encountered. A sheen and droplets of a dark oily substance was observed on the upper surface of the water table.

Based on the field observations in the vicinity of Test Pit #1 and conversations with DSI personnel regarding their daily observations at the site, INTEX concludes that petroleum compounds have migrated to a stone lined drainage culvert located immediately north of Test Pit #1 along the upper surface of the groundwater table and the surface of the limestone bedrock at the site. INTEX also concludes that petroleum contaminants have not migrated westward for a substantial distance based on the results of the installation of Test Pit #2. Test Pit #3 suggests that the exterior of the drainage culvert is not acting as a conduit to assist the migration of petroleum compounds from the source.

V. RECOMMENDATIONS

INTEX submits the following recommendations regarding the Decorative Specialties International, Inc. (NYSDEC Spill #9107640) site:

1) A groundwater collection and treatment system should be installed in the area of Test Pit #1. Initially, INTEX recommends the collection system be in the form of a barrier to prevent the outward migration of petroleum towards the culvert. Drainage piping should be installed to collect groundwater and transport it to a large catch basin where a water level regulated pump would force the water through a treatment system. INTEX can be of assistance to DSI regarding the installation of the above described system and in obtaining those permits and approvals required to comply with applicable NYSDEC regulations.

2) During the installation of the above described collection and treatment system, INTEX recommends that all petroleum contaminated soil encountered be excavated and properly staged. An investigation should be conducted to determine the most cost effective method of properly treating/disposing of the petroleum contaminated soil.

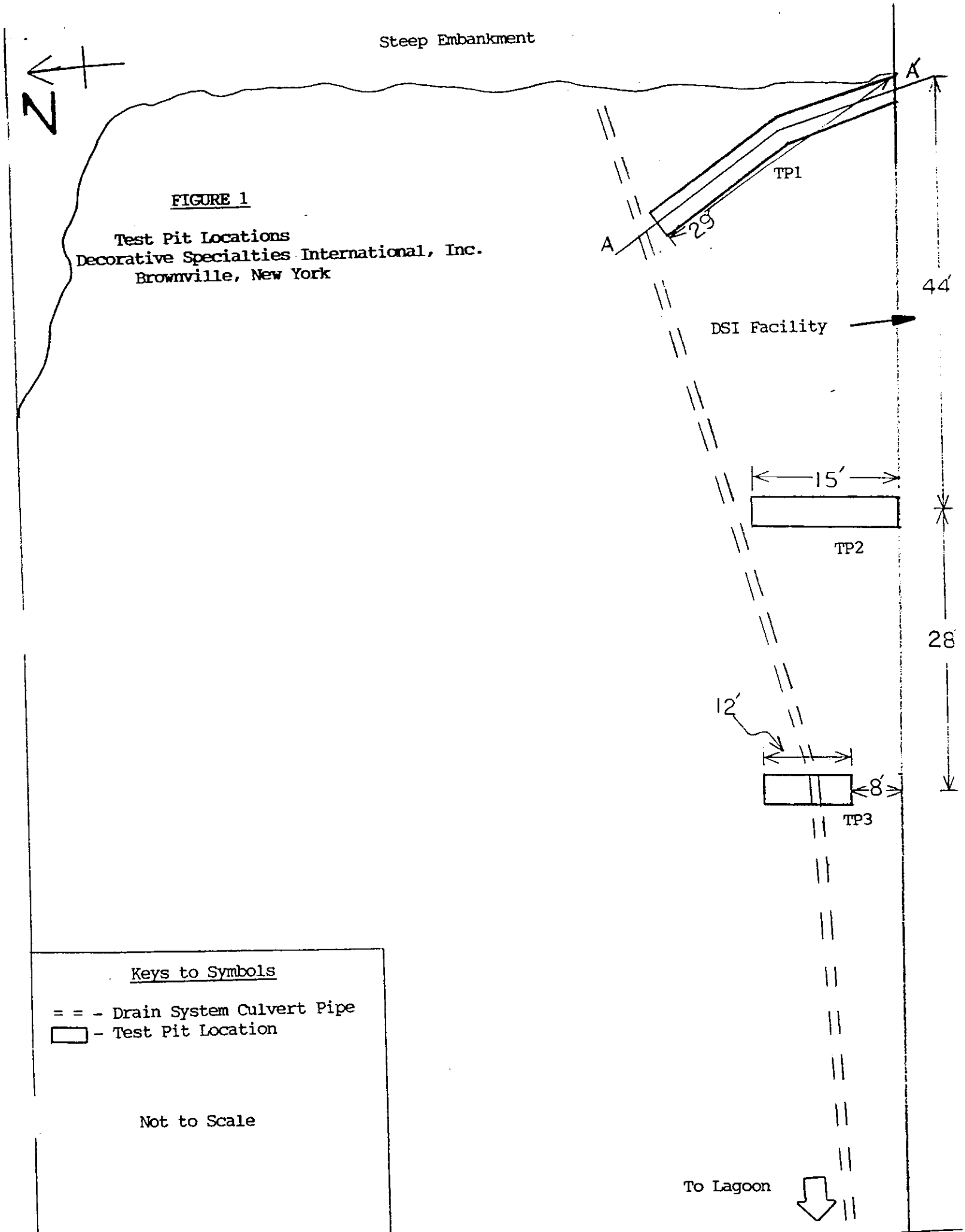
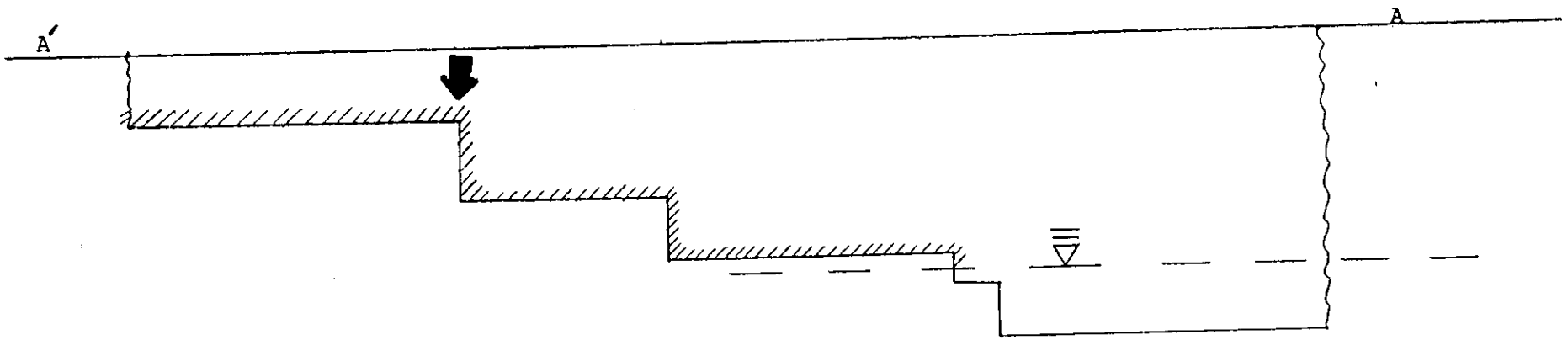


FIGURE 1

Test Pit Locations
Decorative Specialties International, Inc.
Brownville, New York

FIGURE 2

CROSS SECTION OF TEST PIT 1
DECORATIVE SPECIALTIES INTERNATIONAL, INC.
BROWNVILLE, NEW YORK



Keys to Symbols

- Groundwater Table
- Zone of Contaminated Soil/ Stained Bedrock
- Field Screening Sample Collected

INTERNATIONAL EXPLORATION

MARGUERITE DRIVE WEST
RR #3, BOX 88
CANASTOTA, NEW YORK 13032
TELEPHONE: 315-697-3823
TELEFAX: 315-697-3867

BRANCH OFFICES:
DOYLESTOWN, PENNSYLVANIA
215-345-5586
NEWARK, NEW JERSEY
201-589-3650

EST. 1973

(3)

INTEX-92\DSI010

October 19, 1992

Faxed 10/19/92

Ms. Sandra Mercuri
Technical Superintendent
Decorative Specialties International, Inc.
Bridge Street
Brownville, NY 13615

RE: Preliminary Sampling Investigation Report
Decorative Specialties International, Inc.
Brownville, New York

Dear Ms. Mercuri:

Enclosed please find the above referenced report regarding the sampling conducted at the Decorative Specialties International, Inc. (DSI) facility in Brownville, New York.

If you have any questions, please contact this office.

Sincerely,
INTEX, INC.

Richard E. Jones
Geologist

REJ:km
Enc.

cc: Luke McKenney, INTEX
File

PRELIMINARY SAMPLING INVESTIGATION
DECORATIVE SPECIALTIES INTERNATIONAL, INC.
BROWNVILLE, NEW YORK
10/19/92

TABLE OF CONTENTS

PRELIMINARY SAMPLING INVESTIGATION
DECORATIVE SPECIALTIES INTERNATIONAL, INC.
BROWNVILLE, NEW YORK
10/19/92

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PRELIMINARY SAMPLING INVESTIGATION
DECORATIVE SPECIALTIES INTERNATIONAL, INC.
BROWNVILLE, NEW YORK
10/19/92

INTRODUCTION

On September 17, 1992, INTEX completed the collection of water and sediment samples from the area of the lagoon located adjacent to the Decorative Specialties International, Inc. (DSI) facility in Brownville, New York. The samples were collected to more accurately characterize and evaluate the source of a sheen observed on the water's surface in the lagoon.

SITE LOCATION

The DSI facility is located adjacent to the Black River in Brownville, New York. At this location, the Black River has cut a steep sided gorge through the limestone bedrock. A small lagoon is located adjacent to the facility on the north side of the river. Adjacent to the lagoon and facility is an area of suspected fill and a large (12-14") stormwater drainage system outfall. Oil absorbant booms were placed by DSI personnel to contain any petroleum that reportedly is discharged on occasion through the conduit.

PRE-SAMPLING ACTIVITIES

Prior to collecting the water and sediment samples, INTEX performed calibration checks on all monitoring and sampling equipment in compliance with quality assurance and quality control standards established by the manufacturer. A HnU photoionization detector was checked for calibration accuracy using a standard isobutylene gas of known concentration. An Oakton water test meter was calibrated for pH and conductivity using standard test solutions (pH 4, pH 7 and conductivity 1413vs) supplied by manufacturer. The probes of the Oakton water test meter were stored in distilled (analyte free) water to maintain calibration accuracy between analyses.

SAMPLE LOCATIONS

Three sampling locations were selected in the area of the lagoon by the INTEX sampling team. The sampling locations are diagramed in Figure 1 (pg. 5).

Sampling Location SW1/SD1 - Sampling Location SW1/SD1 was located in the area south of a large stormwater drain outfall. Sample SW1 was collected from surface water approximately 1.5 feet from the shore. Sample SD1 was collected from the coarse sand gravel in an area containing visual evidence that the soils have been affected by the stormwater outfall.

Sampling Location SW2/SD2 - Sampling Location SW2/SD2 was located directly west of the stormwater drain outfall. Sample SW2 was collected from surface water approximately 2.0 feet from the shore. Sample SD2 was collected from the coarse sandy gravel along the shore of the lagoon where visual evidence indicated the stormwater discharge had contacted the soils.

Sampling Location SW3/SD3 - Sampling Location SW3/SD3 was located on the east side of the concrete head wall approximately 150 to 200 feet west of the stormwater drain outfall. Sample SW3 was collected approximately 1.0 feet from shore. Sample SD3 was collected from the medium grained silty sand at the water's edge.

Sampling Location SW4 - Sample SW4 was collected from the discharge point of a spring flowing through the limestone bedrock beneath the facility. The discharge point is located approximately fifty (50) feet west of the Route 12E bridge near the bottom (approximately five (5) feet above the water level) of the steep limestone gorge created by the Black River.

SAMPLE COLLECTION

The following methods were used to collect the surface water and sediment samples at the DSI facility:

Surface Water Samples

Samples of surface waters were collected from the area of the lagoon and bedrock spring. The samples were collected in the following manner and transported to a New York State approved laboratory for analysis:

1) Each sampling area was screened for the presence of volatile organic compounds using the HnU photoionizing detector.

2) The Oakton water test meter probes were inserted into the surface water and the water analyzed for the following parameters:

   - pH
   - Temperature
   - Conductivity

   The results of the field analyses were recorded in the project field book.

3) The probes of the water test meter were decontaminated using a triple distilled water rinse. The meter probes were stored in a distilled water bath between analyses.

4) A laboratory decontaminated one (1) quart amber glass sample container was lowered into the water at each sampling location so that only the upper surface of the water was allowed to enter the container.

5) The lid was placed on the container and the sample placed in the cooler provided for the storage and transport of the samples to the laboratory.

6) Chain of custody documentation was completed and placed in the cooler with the samples.

SEDIMENT SAMPLES

Sediment samples were collected from the area of the lagoon at the site. The samples were collected in the following manner and transported to a New York State approved laboratory for analysis:

1) Each sampling area was screened for the presence of volatile organic compounds using the HnU photoionizing detector.

2) A decontaminated stainless steel spoon was used to collect representative sediments from a depth of up to eight (8) inches below the surface.

3) The sediments were placed immediately into a laboratory decontaminated one (1) pint glass sample container. The lid was placed onto the sample container and the sample placed into the cooler provided for the storage and transport of the samples.

4) The excavation from where the sample was collected was scanned for the presence of volatile organic compounds using the HnU photoionizing detector. The field screening results were recorded in the project field book.

5) Chain of custody documentation was completed and placed in the cooler with the samples.

FIELD OBSERVATIONS

INTEX, during the collection of the sediment and surface water samples, recorded several field observations made by the sampling team. During the collection of surface water samples from the area of the lagoon, INTEX noted that oil absorbant booms had been placed across the outlet of the lagoon. A sheen (approximately 6-inch diameter) was observed in the area enclosed by the oil absorbant booms. The most dense concentration of the sheen was located in the area surrounding the oil absorbant booms.

Sediments in the area of the lagoon were composed of brown to dark brown medium to coarse grained sand gravel. No staining of the sediments was observed during the investigation. The area surrounding the lagoon exhibited evidence that the area had been filled. Concrete slabs and debris were observed in the water and along the shoreline of the lagoon adjacent to the DSI facility.

Conversations with DSI personnel have indicated that black droplets have been observed discharging from the storm drain outfall to the lagoon. A discharge of petroleum compounds was previously reported in an area drained by the stormwater drain.

SAMPLE ANALYSIS

The samples of surface water and sediments collected from the DSI facility were analyzed at a New York State approved laboratory for the following parameters:

- Total Petroleum Hydrocarbons (NYSDOH 310-13)

ANALYSIS RESULTS

The results of the field screening and field analysis conducted at the DSI facility have been summarized in Table 1 (pg. 3).

The laboratory results for the surface water and sediment samples collected at the DSI facility have been summarized in Table 2 (pg. 4). The Laboratory Results Report is included on Page 6.

TABLE 1

FIELD SCREENING ANALYSIS RESULTS
DECORATIVE SPECIALTIES INTERNATIONAL, INC.
BROWNVILLE, NEW YORK

Sample Location	pH	Temperature	Conductivity (uS)
SW-1	6.8	21.1°	187
SW-2	6.8	20.8°	162
SW-3	6.6	21.0°	121
SW-4	7.0	22.0°	487
		Volatile Organic Compounds (ppm)	
SD-1	ND		
SD-2	ND		
SD-3	ND		

TABLE 2

LABORATORY RESULTS SUMMARY
DECORATIVE SPECIALTIES INTERNATIONAL, INC.
BROWNVILLE, NEW YORK

Sample Location	Total Petroleum Hydrocarbons (NYSDOH 310-13)
SW-1	ND (<10.0 ug/l)
SW-2	ND (<10.0 ug/l)
SW-3	ND (<10.0 ug/l)
SW-4	ND (<10.0 ug/l)
SD-1	ND (<10.0 ug/kg)
SD-2	ND (<10.0 ug/kg)
SD-3	ND (<10.0 ug/kg)

DISCUSSION OF RESULTS

Field observations and conversations with DSI employees indicate that petroleum compounds may be discharging to the area of the lagoon from the stormwater drainage system. Samples collected from the surface waters in the area of the lagoon were analyzed for conductivity. Field analysis results indicate that relatively low concentrations of dissolved ions exist in the lagoon surface water.

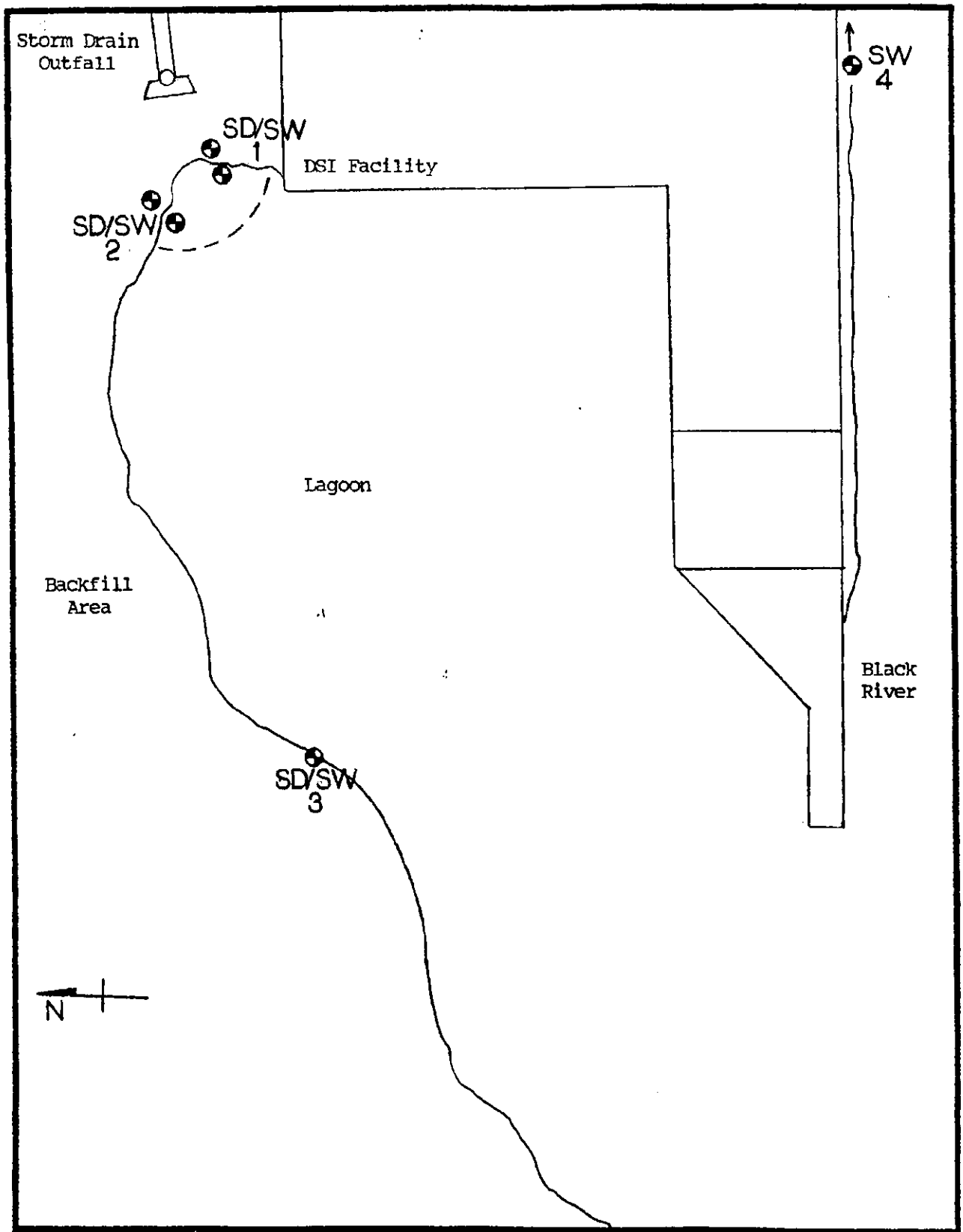
Laboratory results obtained from surface water samples collected from the area of the lagoon and bedrock spring have indicated that petroleum hydrocarbons were not detected in the lagoon surface water at concentrations above the laboratory quantitative limit of 10.0 ug/l.

The possibility exists that the large volume of water contained in the lagoon has diluted the volume of petroleum compounds discharged through the stormwater drainage system to a concentration of less than 10.0 ug/l.

Petroleum hydrocarbons were not detected at concentrations at or above 10.0 ug/kg in the sediment samples collected in the area of the lagoon. The sediment samples (SD-1 and SD-2) were collected in areas visually impacted by the stormwater discharge. The laboratory results indicate that petroleum products, if discharged in the past, have not yet accumulated in the sediments sampled to concentrations above 10.0 ug/kg. The continued discharge of petroleum products from the stormwater drain system (if any) may allow the accumulation of petroleum to levels of concern in the sediments at the site.

RECOMMENDATIONS

The origin of the sheen and/or reported petroleum discharge from the stormwater drainage system should be determined. An intrusive investigation should be conducted to determine if petroleum compounds from the reported discharge have migrated to the area of the stormwater drainage system. This investigation should be conducted to prevent the accumulation of petroleum compounds to levels of concern in the area of the stormwater outfall and lagoon. INTEX has previously (August 10, 1992) forwarded a scope of work and cost estimate proposal to complete the intrusive investigation at the DSI facility.



International Exploration, Inc.	Client: DSI, Inc.	Figure #: 1
Sampling Location Location of Oil Absorbant Booms	Location: Brownville New York	Project #:
	Date: 10/15/92	Scale: Not to Scale

BUCK ENVIRONMENTAL LABORATORIES INC.
3845 ROUTE 11 SOUTH, CORTLAND, N.Y. 13045
P.O. BOX 5150 607-753-3403

Report Date: 10/05/92

Lab Log Number: 9209206

LABORATORY REPORT

Client: **INTEX**

Site: DSI

Date of Sample: 9/17/92 by K.H., R.J., Received 9/22/92

Samples: Water & Soil

Method:
- o Flame Ionization Detector, and/or GC/MS (75 degrees for 4 minutes, 8 degrees/min to 310 degrees C)
- o N2 purge at 25ml/min - calibrated against toluene standard (unless otherwise noted)
- o Adapted from NYSDOH 310-13 methodology

TOTAL PETROLEUM HYDROCARBON QUANTITATION

SW-1	ND (<10.0 ug/L)
SW-2	ND (<10.0 ug/L)
SW-3	ND (<10.0 ug/L)
SW-4	ND (<10.0 ug/L)
SD-1	ND (<10.0 ug/kg)
SD-2	ND (<10.0 ug/kg)
SD-3	ND (<10.0 ug/kg)

ND - None detected greater than detection limits noted.

This analysis is certified as conforming to generally accepted laboratory practices and requirements of the New York State Health Department ELAP program.

John H. Buck, P.E.
Laboratory Director

NYS ELAP CERT 10795

APPENDIX 31

1997 Titanium Dioxide AST Leak

To: Keith Strohschein
Bill Hughes
Ken Netto NYSDEC

From: Steve Lange

Subject: TiO2 Spill

Date: 27 May 97

On 8 May 97 the legs on the TiO2 tank in the tank farm collapsed. The tank, which had been filled to a capacity of approximately 4400 gallons at 4:30 p.m., developed a leak. The leak was discovered at approximately 5:50 p.m. by the Boilerman making his rounds.

TiO2 flowed into the secondary containment area. The doorway to the containment area is sealed by a dam. The gasket under the dam leaked, allowing TiO2 to flow out of the containment area to the level below. After collecting on the floor of the level below the material flowed out of a hole in the wall to the outside of the mill. This is the west facing wall inside the transformer yard. This was the only material that escaped the mill. Approximately three yards of soil was removed from this area and disposed of in the sludge dumpster. The area was then filled in with stone.

Approximately 2000 gallons were salvaged by pumping the material out of the leaking tank to the coater kitchen and into totes. Approximately 1600 gallons were pumped off the floor and out of the secondary containment area. This material is contaminated and will not be used in our process. It is not yet known if there is an outlet for this material or if it will be dewatered through our DE filter and landfilled. Other material was cleaned up with speedi-dry, shovels and brooms and then thrown out.

The DEC Hotline was notified. The regional office called and were given the details of the occurrence.

The tank has been modified so that it has a flat bottom that sits directly on the concrete floor without legs. The sides of the tank have been reinforced. The dam will be reinstalled with a heavy duty sealant under it. A liquid detector has been purchased and will be installed in the containment area with an alarm to the boiler house.

APPENDIX 32

PCB and Transformer Surveys

CES Certified Environmental Services, Inc.

1401 Erie Blvd. East
Syracuse, NY 13210
Phone 315-478-2374
Fax 315-478-2107

October 2, 2000

Rexam DSI
Mr. Mark Lappies, Plant Engineer
Bridge Street
Brownville, New York 13615

RE: PCB Inspection/Sampling at the Brownville, NY facility

Dear Mr. Lappies:

On August 11, 2000, Certified Environmental Services, Inc. (CES) personnel collected samples for polychlorinated biphenyl (PCB) analyses throughout the Rexam DSI papermill located on Bridge Street, Brownville, New York. A total of twenty-four (24) wipe samples (CES Log Numbers 226524 through 226547) and four (4) oil samples (CES Log Numbers 226515 through 226518) were collected.

The wipe samples were analyzed in accordance with Method DOH 312-3 and the oil samples were analyzed in accordance with EPA Method 8080. The laboratory results did not indicate the presence of the PCB's Aroclors 1221, 1232, 1242/1016, 1248, 1254 and 1260 in any of the samples collected. The laboratory analytical reports and associated chain of custody documentation have been provided as Attachment A.

The wipe samples were collected from stained floors, machinery and pumps. The sample locations have been noted on the floor plans provided by Rexam DSI and have been provided as Attachment B. A total of ten samples were collected from the 1st Floor, eleven samples were collected from the 2nd Floor, two samples from the 3rd Floor, one sample from the 4th Floor. The four oil samples were collected from drums and 5-gallon buckets located on the 2nd floor. The sample locations are listed in the following table:

Sample Locations

Sample ID	***Sample Location***
RD-811-01	2nd Floor - Stained Floor
RD-811-02	2nd Floor - Off Pump
RD-811-03	2nd Floor - Directly Below Pump
RD-811-04	2nd Floor - Below Suspended Tank Off Floor
RD-811-05	2nd Floor - Stained Floor by Drums
RD-811-06	2nd Floor - Stained Floor by Machinery
RD-811-07	2nd Floor - Stained Floor by Drum

CES

October 2, 2000

Sample Locations (Cont'd)

Sample ID	*Sample Location*
RD-811-08	2nd Floor - Off Pump
RD-811-09	2nd Floor - Concrete Pad Below Pump
RD-811-10	2nd Floor - Off Machinery Associated with Pulper
RD-811-11	2nd Floor - Stained Floor
RD-811-12	3rd Floor - Off Pump
RD-811-13	3rd Floor - Off Cement Pad to Pump
RD-811-14	4th Floor - Off Pump (River)
RD-811-15	1st Floor - Off Pump to PM Winder
RD-811-16	1st Floor - Off Paper Machine Dryer 1&2
RD-811-17	1st Floor - Off Paper Machine Reel
RD-811-18	1st Floor - Off Stained Floor
RD-811-19	1st Floor - Off Pump to DE Filter
RD-811-20	1st Floor - Off Off-Line Coater
RD-811-21	1st Floor - Off Inspection Wheel
RD-811-22	1st Floor - Off Drill Press
RD-811-23	1st Floor - Off Stained Floor
RD-811-24	1st Floor - Off Pump to Paper Machine Dryer 1&2
RD-811-25	2nd Floor - Large Used Oil Container
RD-811-26	2nd Floor - 5 Gallon Bucket with Pink Oil
RD-811-27	2nd Floor - 5 Gallon Bucket with Dark Colored Oil
RD-811-28	2nd Floor - 5 Gallon Bucket with Light Brown Oil

CES

October 2, 2000

If you should have questions, please do not hesitate to call me at (315) 478-2374.

Sincerely:
Certified Environmental Services, Inc.

Nicole R. Copeland
Technical Services Manager

Attachment A - Laboratory Reports
Attachment B - Project Drawings

CES

ATTACHMENT A

Laboratory Analysis Reports &
Chain of Custody Documentation

CES Certified Environmental Services, Inc.

1401 Erie Blvd. East
Syracuse, NY 13210
Phone 315-478-2374
Fax 315-478-2107

REPORT OF ANALYSES

Rexam DSI
Bridge Street
Brownville, NY 13615-
Attn: Mr. Mark Lappies

PROJECT NAME: PCB Inspection
DATE: 08/29/2000

SAMPLE NUMBER- 226524
DATE SAMPLED- 08/11/00
DATE RECEIVED- 08/14/00
TIME RECEIVED- 0930

SAMPLE ID- RD-811-1/2nd Fl-Strained Fl

SAMPLER- Nicole Copeland
DELIVERED BY- Nicole Copeland

SAMPLE MATRIX- OT
TIME SAMPLED- 1030
RECEIVED BY- DJS
TYPE SAMPLE- Grab

ANALYSIS	METHOD	SAMPLE PREP DATE	BY	ANALYSIS DATE	TIME	BY	RESULT	UNITS
PCB'S IN WIPE	DOH 312-3	08/18/00	DG	08/24/00		BLD		
AROCLOR 1221	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROCLOR 1232	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROCLOR 1242/1016	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROCLOR 1248	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROCLOR 1254	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROLCOR 1260	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe

NYSDOH LAB ID NO. 11246

APPROVED BY: _____

(Terms and Conditions on Reverse Side)

CES Certified Environmental Services, Inc.

1401 Erie Blvd. East
Syracuse, NY 13210
Phone 315-478-2374
Fax 315-478-2107

REPORT OF ANALYSES

Rexam DSI
Bridge Street
Brownville, NY 13615-
Attn: Mr. Mark Lappies

PROJECT NAME: PCB Inspection
DATE: 08/29/2000

SAMPLE NUMBER- 226525
DATE SAMPLED- 08/11/00
DATE RECEIVED- 08/14/00
TIME RECEIVED- 0930

SAMPLE ID- RD-811-2/2nd Fl-Off Pump
SAMPLER- Nicole Copeland
DELIVERED BY- Nicole Copeland

SAMPLE MATRIX- OT
TIME SAMPLED- 1040
RECEIVED BY- DJS
TYPE SAMPLE- Grab

ANALYSIS	METHOD	SAMPLE PREP DATE	BY	ANALYSIS DATE	TIME	BY	RESULT	UNITS
PCB'S IN WIPE	DOH 312-3	08/18/00	DG	08/24/00		BLD		
AROCLOR 1221	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROCLOR 1232	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROCLOR 1242/1016	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROCLOR 1248	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROCLOR 1254	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROLCOR 1260	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe

NYSDOH LAB ID NO. 11246

APPROVED BY: _____
(Terms and Conditions on Reverse Side)

CES Certified Environmental Services, Inc.

1401 Erie Blvd. East
Syracuse, NY 13210
Phone 315-478-2374
Fax 315-478-2107

REPORT OF ANALYSES

PROJECT NAME: PCB Inspection
DATE: 08/29/2000

Rexam DSI
Bridge Street
Brownville, NY 13615-
Attn: Mr. Mark Lappies

SAMPLE NUMBER- 226526
DATE SAMPLED- 08/11/00
DATE RECEIVED- 08/14/00
TIME RECEIVED- 0930

SAMPLE ID- RD-811-3/2nd Fl-Below Pump

SAMPLER- Nicole Copeland
DELIVERED BY- Nicole Copeland

SAMPLE MATRIX- OT
TIME SAMPLED- 1050
RECEIVED BY- DJS
TYPE SAMPLE- Grab

ANALYSIS	METHOD	SAMPLE PREP DATE	BY	ANALYSIS DATE	TIME	BY	RESULT	UNITS
PCB'S IN WIPE	DOH 312-3	08/18/00	DG	08/24/00		BLD		
AROCLOR 1221	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROCLOR 1232	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROCLOR 1242/1016	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROCLOR 1248	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROCLOR 1254	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROLCOR 1260								

NYSDOH LAB ID NO. 11246

APPROVED BY: _____

(Terms and Conditions on Reverse Side)

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Phone 315-478-2374
Fax 315-478-2107

REPORT OF ANALYSES

Rexam DSI
Bridge Street
Brownville, NY 13615-
Attn: Mr. Mark Lappies

PROJECT NAME: PCB Inspection
DATE: 08/29/2000

SAMPLE NUMBER- 226527
DATE SAMPLED- 08/11/00
DATE RECEIVED- 08/14/00
TIME RECEIVED- 0930

SAMPLE ID- RD-811-4/2nd Fl-Stained Floor
SAMPLER- Nicole Copeland
DELIVERED BY- Nicole Copeland

SAMPLE MATRIX- OT
TIME SAMPLED- 1100
RECEIVED BY- DJS
TYPE SAMPLE- Grab

ANALYSIS	METHOD	SAMPLE PREP DATE	BY	ANALYSIS DATE	TIME	BY	RESULT	UNITS
PCB'S IN WIPE	DOH 312-3	08/18/00	DG	08/24/00		BLD		
AROCLOR 1221	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROCLOR 1232	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROCLOR 1242/1016	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROCLOR 1248	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROCLOR 1254	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROLCOR 1260	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe

NYSDOH LAB ID NO. 11246

APPROVED BY: _____

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CES Certified Environmental Services, Inc.

1401 Erie Blvd. East
Syracuse, NY 13210
Phone 315-478-2374
Fax 315-478-2107

REPORT OF ANALYSES

PROJECT NAME: PCB Inspection
DATE: 08/29/2000

Rexam DSI
Bridge Street
Brownville, NY 13615-
Attn: Mr. Mark Lappies

SAMPLE NUMBER- 226528
DATE SAMPLED- 08/11/00
DATE RECEIVED- 08/14/00
TIME RECEIVED- 0930

SAMPLE ID- RD-811-5/2nd Fl-Stained Floor
SAMPLER- Nicole Copeland
DELIVERED BY- Nicole Copeland

SAMPLE MATRIX- OT
TIME SAMPLED- 1110
RECEIVED BY- DJS
TYPE SAMPLE- Grab

ANALYSIS	METHOD	SAMPLE PREP DATE	BY	ANALYSIS DATE	TIME	BY	RESULT	UNITS
PCB'S IN WIPE	DOH 312-3	08/18/00	DG	08/24/00		BLD		
AROCLOR 1221	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROCLOR 1232	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROCLOR 1242/1016	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROCLOR 1248	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROCLOR 1254	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROLCOR 1260	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe

NYSDOH LAB ID NO. 11246

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Syracuse, NY 13210
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Fax 315-478-2107

REPORT OF ANALYSES

PROJECT NAME: PCB Inspection
DATE: 08/29/2000

Rexam DSI
Bridge Street
Brownville, NY 13615-
Attn: Mr. Mark Lappies

SAMPLE NUMBER- 226529
DATE SAMPLED- 08/11/00
DATE RECEIVED- 08/14/00
TIME RECEIVED- 0930

SAMPLE ID- RD-811-6/2nd Fl-Stained Floor
SAMPLER- Nicole Copeland
DELIVERED BY- Nicole Copeland

SAMPLE MATRIX- OT
TIME SAMPLED- 1120
RECEIVED BY- DJS
TYPE SAMPLE- Grab

ANALYSIS	METHOD	SAMPLE PREP DATE	BY	ANALYSIS DATE	TIME	BY	RESULT	UNITS
PCB'S IN WIPE	DOH 312-3	08/18/00	DG	08/24/00		BLD		
AROCLOR 1221	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROCLOR 1232	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROCLOR 1242/1016	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROCLOR 1248	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROCLOR 1254	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROLCOR 1260	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe

NYSDOH LAB ID NO. 11246

APPROVED BY: _____
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REPORT OF ANALYSES

PROJECT NAME: PCB Inspection
DATE: 08/29/2000

Rexam DSI
Bridge Street
Brownville, NY 13615-
Attn: Mr. Mark Lappies

SAMPLE NUMBER- 226530 SAMPLE ID- RD-811-7/2nd Fl-Stained Floor SAMPLE MATRIX- OT
DATE SAMPLED- 08/11/00 TIME SAMPLED- 1130
DATE RECEIVED- 08/14/00 SAMPLER- Nicole Copeland RECEIVED BY- DJS
TIME RECEIVED- 0930 DELIVERED BY- Nicole Copeland TYPE SAMPLE- Grab

ANALYSIS	METHOD	SAMPLE PREP DATE	BY	ANALYSIS DATE	TIME	BY	RESULT	UNITS
PCB'S IN WIPE	DOH 312-3	08/18/00	DG	08/24/00		BLD		
AROCLOR 1221	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROCLOR 1232	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROCLOR 1242/1016	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROCLOR 1248	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROCLOR 1254	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROLCOR 1260	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe

NYSDOH LAB ID NO. 11246 APPROVED BY: Richard A. Lemek

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REPORT OF ANALYSES

PROJECT NAME: PCB Inspection
DATE: 08/29/2000

Rexam DSI
Bridge Street
Brownville, NY 13615-
Attn: Mr. Mark Lappies

SAMPLE NUMBER- 226531
DATE SAMPLED- 08/11/00
DATE RECEIVED- 08/14/00
TIME RECEIVED- 0930

SAMPLE ID- RD-811-8/2nd Fl-Pump
SAMPLER- Nicole Copeland
DELIVERED BY- Nicole Copeland

SAMPLE MATRIX- OT
TIME SAMPLED- 1140
RECEIVED BY- DJS
TYPE SAMPLE- Grab

ANALYSIS	METHOD	SAMPLE PREP DATE	BY	ANALYSIS DATE	TIME	BY	RESULT	UNITS
PCB'S IN WIPE	DOH 312-3	08/18/00	DG	08/24/00		BLD		
AROCLOR 1221	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROCLOR 1232	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROCLOR 1242/1016	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROCLOR 1248	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROCLOR 1254	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROLCOR 1260	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe

NYSDOH LAB ID NO. 11246

APPROVED BY: _____

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REPORT OF ANALYSES

Rexam DSI
Bridge Street
Brownville, NY 13615-
Attn: Mr. Mark Lappies

PROJECT NAME: PCB Inspection
DATE: 08/29/2000

SAMPLE NUMBER- 226532
DATE SAMPLED- 08/11/00
DATE RECEIVED- 08/14/00
TIME RECEIVED- 0930

SAMPLE ID- RD-811-9/2nd Fl-Concrete Pad
SAMPLER- Nicole Copeland
DELIVERED BY- Nicole Copeland

SAMPLE MATRIX- OT
TIME SAMPLED- 1150
RECEIVED BY- DJS
TYPE SAMPLE- Grab

ANALYSIS	METHOD	SAMPLE PREP DATE	BY	ANALYSIS DATE	TIME	BY	RESULT	UNITS
PCB'S IN WIPE	DOH 312-3	08/18/00	DG	08/24/00		BLD		
AROCLOR 1221	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROCLOR 1232	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROCLOR 1242/1016	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROCLOR 1248	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROCLOR 1254	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROLCOR 1260	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe

NYSDOH LAB ID NO. 11246

APPROVED BY: Patrick C. Jones

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REPORT OF ANALYSES

Rexam DSI
Bridge Street
Brownville, NY 13615-
Attn: Mr. Mark Lappies

PROJECT NAME: PCB Inspection
DATE: 08/29/2000

SAMPLE NUMBER- 226533
DATE SAMPLED- 08/11/00
DATE RECEIVED- 08/14/00
TIME RECEIVED- 0930

SAMPLE ID- RD-811-10/2nd Fl-Machinery

SAMPLER- Nicole Copeland
DELIVERED BY- Nicole Copeland

SAMPLE MATRIX- OT
TIME SAMPLED- 1200
RECEIVED BY- DJS
TYPE SAMPLE- Grab

Page 1 of 1

ANALYSIS	METHOD	SAMPLE PREP DATE	BY	ANALYSIS DATE	TIME	BY	RESULT	UNITS
PCB'S IN WIPE	DOH 312-3	08/18/00	DG	08/24/00		BLD		
AROCLOR 1221	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROCLOR 1232	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROCLOR 1242/1016	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROCLOR 1248	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROCLOR 1254	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe
AROLCOR 1260	DOH 312-3	08/18/00	DG	08/24/00		BLD	< 1.5	ug/wipe

NYSDOH LAB ID NO. 11246

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REPORT OF ANALYSES

PROJECT NAME: PCB Inspection
DATE: 08/29/2000

Rexam DSI
Bridge Street
Brownville, NY 13615-
Attn: Mr. Mark Lappies

SAMPLE NUMBER- 226534
DATE SAMPLED- 08/11/00
DATE RECEIVED- 08/14/00
TIME RECEIVED- 0930

SAMPLE ID- RD-811-11/2nd Fl-Stained Floor
SAMPLER- Nicole Copeland
DELIVERED BY- Nicole Copeland

SAMPLE MATRIX- OT
TIME SAMPLED- 1210
RECEIVED BY- DJS
TYPE SAMPLE- Grab

ANALYSIS	METHOD	SAMPLE PREP DATE	BY	ANALYSIS DATE	TIME	BY	RESULT	UNITS
PCB'S IN WIPE	DOH 312-3	08/18/00	DG	08/25/00		BLD		
AROCLOR 1221	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1232	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1242/1016	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1248	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1254	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROLCOR 1260								

NYSDOH LAB ID NO. 11246

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REPORT OF ANALYSES

Rexam DSI
Bridge Street
Brownville, NY 13615-
Attn: Mr. Mark Lappies

PROJECT NAME: PCB Inspection
DATE: 08/29/2000

SAMPLE NUMBER- 226535 SAMPLE ID- RD-811-12/3rd Fl-Off Pump SAMPLE MATRIX- OT
DATE SAMPLED- 08/11/00 TIME SAMPLED- 1220
DATE RECEIVED- 08/14/00 SAMPLER- Nicole Copeland RECEIVED BY- DJS
TIME RECEIVED- 0930 DELIVERED BY- Nicole Copeland TYPE SAMPLE- Grab

ANALYSIS	METHOD	SAMPLE PREP DATE	BY	ANALYSIS DATE	TIME	BY	RESULT	UNITS
PCB'S IN WIPE	DOH 312-3	08/18/00	DG	08/25/00		BLD		
AROCLOR 1221	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1232	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1242/1016	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1248	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1254	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROLCOR 1260	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe

NYSDOH LAB ID NO. 11246 APPROVED BY: _____

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REPORT OF ANALYSES

PROJECT NAME: PCB Inspection
DATE: 08/29/2000

Rexam DSI
Bridge Street
Brownville, NY 13615-
Attn: Mr. Mark Lappies

SAMPLE NUMBER- 226536
DATE SAMPLED- 08/11/00
DATE RECEIVED- 08/14/00
TIME RECEIVED- 0930

SAMPLE ID- RD-811-13/3rd Fl-Pump

SAMPLER- Nicole Copeland
DELIVERED BY- Nicole Copeland

SAMPLE MATRIX- OT
TIME SAMPLED- 1230
RECEIVED BY- DJS
TYPE SAMPLE- Grab

ANALYSIS	METHOD	SAMPLE PREP DATE	BY	ANALYSIS DATE	TIME	BY	RESULT	UNITS
PCB'S IN WIPE	DOH 312-3	08/18/00	DG	08/25/00		BLD		
AROCLOR 1221	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1232	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1242/1016	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1248	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1254	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROLCOR 1260								

NYSDOH LAB ID NO. 11246

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REPORT OF ANALYSES

Rexam DSI
Bridge Street
Brownville, NY 13615-
Attn: Mr. Mark Lappies

PROJECT NAME: PCB Inspection
DATE: 08/29/2000

SAMPLE NUMBER- 226537
DATE SAMPLED- 08/11/00
DATE RECEIVED- 08/14/00
TIME RECEIVED- 0930

SAMPLE ID- RD-811-14/4th Fl-River Pump

SAMPLER- Nicole Copeland
DELIVERED BY- Nicole Copeland

SAMPLE MATRIX- OT
TIME SAMPLED- 1240
RECEIVED BY- DJS
TYPE SAMPLE- Grab

ANALYSIS	METHOD	SAMPLE PREP DATE	BY	ANALYSIS DATE	TIME	BY	RESULT	UNITS
PCB'S IN WIPE	DOH 312-3	08/18/00	DG	08/25/00		BLD		
AROCLOR 1221	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1232	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1242/1016	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1248	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1254	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROLCOR 1260	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe

NYSDOH LAB ID NO. 11246

APPROVED BY: _____

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REPORT OF ANALYSES

PROJECT NAME: PCB Inspection
DATE: 08/29/2000

Rexam DSI
Bridge Street
Brownville, NY 13615-
Attn: Mr. Mark Lappies

SAMPLE NUMBER- 226538
DATE SAMPLED- 08/11/00
DATE RECEIVED- 08/14/00
TIME RECEIVED- 0930

SAMPLE ID- RD-811-15/1st Fl-Pump

SAMPLER- Nicole Copeland
DELIVERED BY- Nicole Copeland

SAMPLE MATRIX- OT
TIME SAMPLED- 1250
RECEIVED BY- DJS
TYPE SAMPLE- Grab

ANALYSIS	METHOD	SAMPLE PREP DATE	BY	ANALYSIS DATE	TIME	BY	RESULT	UNITS
PCB'S IN WIPE	DOH 312-3	08/18/00	DG	08/25/00		BLD		
AROCLOR 1221	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1232	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1242/1016	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1248	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1254	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROLCOR 1260	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe

NYSDOH LAB ID NO. 11246

APPROVED BY: _____

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REPORT OF ANALYSES

Rexam DSI
Bridge Street
Brownville, NY 13615-
Attn: Mr. Mark Lappies

PROJECT NAME: PCB Inspection
DATE: 08/29/2000

SAMPLE NUMBER- 226539
DATE SAMPLED- 08/11/00
DATE RECEIVED- 08/14/00
TIME RECEIVED- 0930

SAMPLE ID- RD-811-16/1st Fl-Paper Machine
SAMPLER- Nicole Copeland
DELIVERED BY- Nicole Copeland

SAMPLE MATRIX- OT
TIME SAMPLED- 1300
RECEIVED BY- DJS
TYPE SAMPLE- Grab

ANALYSIS	METHOD	SAMPLE PREP DATE	BY	ANALYSIS DATE	TIME	BY	RESULT	UNITS
PCB'S IN WIPE	DOH 312-3	08/18/00	DG	08/25/00		BLD		
AROCLOR 1221	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1232	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1242/1016	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1248	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1254	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROLCOR 1260	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe

NYSDOH LAB ID NO. 11246

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REPORT OF ANALYSES

PROJECT NAME: PCB Inspection
DATE: 08/29/2000

Rexam DSI
Bridge Street
Brownville, NY 13615-
Attn: Mr. Mark Lappies

SAMPLE NUMBER- 226540
DATE SAMPLED- 08/11/00
DATE RECEIVED- 08/14/00
TIME RECEIVED- 0930

SAMPLE ID- RD-811-17/1st Fl-Paper Machine
SAMPLER- Nicole Copeland
DELIVERED BY- Nicole Copeland

SAMPLE MATRIX- OT
TIME SAMPLED- 1310
RECEIVED BY- DJS
TYPE SAMPLE- Grab

ANALYSIS	METHOD	SAMPLE PREP DATE	BY	ANALYSIS DATE	TIME	BY	RESULT	UNITS
PCB'S IN WIPE	DOH 312-3	08/18/00	DG	08/25/00		BLD		
AROCLOR 1221	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1232	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1242/1016	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1248	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1254	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROLCOR 1260	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe

NYSDOH LAB ID NO. 11246

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REPORT OF ANALYSES

Rexam DSI
Bridge Street
Brownville, NY 13615-
Attn: Mr. Mark Lappies

PROJECT NAME: PCB Inspection
DATE: 08/29/2000

SAMPLE NUMBER- 226541 SAMPLE ID- RD-811-18/1st Fl-Stained Floor SAMPLE MATRIX- OT
DATE SAMPLED- 08/11/00 TIME SAMPLED- 1320
DATE RECEIVED- 08/14/00 SAMPLER- Nicole Copeland RECEIVED BY- DJS
TIME RECEIVED- 0930 DELIVERED BY- Nicole Copeland TYPE SAMPLE- Grab

Page 1 of 1

ANALYSIS	METHOD	SAMPLE PREP DATE	BY	ANALYSIS DATE	TIME	BY	RESULT	UNITS
PCB'S IN WIPE	DOH 312-3	08/18/00	DG	08/25/00		BLD		
AROCLOR 1221	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1232	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1242/1016	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1248	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1254	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROLCOR 1260	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe

NYSDOH LAB ID NO. 11246 APPROVED BY: _____
(Terms and Conditions on Reverse Side)

CES Certified Environmental Services, Inc.

1401 Erie Blvd. East
Syracuse, NY 13210
Phone 315-478-2374
Fax 315-478-2107

REPORT OF ANALYSES

PROJECT NAME: PCB Inspection
DATE: 08/29/2000

Rexam DSI
Bridge Street
Brownville, NY 13615-
Attn: Mr. Mark Lappies

SAMPLE NUMBER- 226542
DATE SAMPLED- 08/11/00
DATE RECEIVED- 08/14/00
TIME RECEIVED- 0930

SAMPLE ID- RD-811-19/1st Fl-Pump

SAMPLER- Nicole Copeland
DELIVERED BY- Nicole Copeland

SAMPLE MATRIX- OT
TIME SAMPLED- 1330
RECEIVED BY- DJS
TYPE SAMPLE- Grab

ANALYSIS	METHOD	SAMPLE PREP DATE	BY	ANALYSIS DATE	TIME	BY	RESULT	UNITS
PCB'S IN WIPE	DOH 312-3	08/18/00	DG	08/25/00		BLD		
AROCLOR 1221	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1232	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1242/1016	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1248	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1254	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROLCOR 1260	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe

NYSDOH LAB ID NO. 11246

APPROVED BY: _____
(Terms and Conditions on Reverse Side)

CES Certified Environmental Services, Inc.

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Syracuse, NY 13210
Phone 315-478-2374
Fax 315-478-2107

REPORT OF ANALYSES

Rexam DSI
Bridge Street
Brownville, NY 13615-
Attn: Mr. Mark Lappies

PROJECT NAME: PCB Inspection
DATE: 08/29/2000

SAMPLE NUMBER- 226543
DATE SAMPLED- 08/11/00
DATE RECEIVED- 08/14/00
TIME RECEIVED- 0930

SAMPLE ID- RD-811-20/1st Fl-Off Ln Coater

SAMPLER- Nicole Copeland
DELIVERED BY- Nicole Copeland

SAMPLE MATRIX- OT
TIME SAMPLED- 1340
RECEIVED BY- DJS
TYPE SAMPLE- Grab

ANALYSIS	METHOD	SAMPLE PREP DATE	BY	ANALYSIS DATE	TIME	BY	RESULT	UNITS
PCB'S IN WIPE	DOH 312-3	08/18/00	DG	08/25/00		BLD		
AROCLOR 1221	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1232	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1242/1016	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1248	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1254	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROLCOR 1260	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe

NYSDOH LAB ID NO. 11246

APPROVED BY: _____
(Terms and Conditions on Reverse Side)

CES Certified Environmental Services, Inc.

1401 Erie Blvd. East
Syracuse, NY 13210
Phone 315-478-2374
Fax 315-478-2107

REPORT OF ANALYSES

PROJECT NAME: PCB Inspection
DATE: 08/29/2000

Rexam DSI
Bridge Street
Brownville, NY 13615-
Attn: Mr. Mark Lappies

SAMPLE NUMBER- 226544 SAMPLE ID- RD-811-21/1st Fl-Inspect Wheel SAMPLE MATRIX- OT
DATE SAMPLED- 08/11/00 TIME SAMPLED- 1350
DATE RECEIVED- 08/14/00 SAMPLER- Nicole Copeland RECEIVED BY- DJS
TIME RECEIVED- 0930 DELIVERED BY- Nicole Copeland TYPE SAMPLE- Grab

ANALYSIS	METHOD	SAMPLE PREP DATE	BY	ANALYSIS DATE	TIME	BY	RESULT	UNITS
PCB'S IN WIPE	DOH 312-3	08/18/00	DG	08/25/00		BLD		
AROCLOR 1221	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1232	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1242/1016	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1248	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1254	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROLCOR 1260								

NYSDOH LAB ID NO. 11246 APPROVED BY: _____

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CES Certified Environmental Services, Inc.

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Syracuse, NY 13210
Phone 315-478-2374
Fax 315-478-2107

REPORT OF ANALYSES

Rexam DSI
Bridge Street
Brownville, NY 13615-
Attn: Mr. Mark Lappies

PROJECT NAME: PCB Inspection
DATE: 08/29/2000

SAMPLE NUMBER- 226545
DATE SAMPLED- 08/11/00
DATE RECEIVED- 08/14/00
TIME RECEIVED- 0930

SAMPLE ID- RD-811-22/1st Fl-Drill Press
SAMPLER- Nicole Copeland
DELIVERED BY- Nicole Copeland

SAMPLE MATRIX- OT
TIME SAMPLED- 1400
RECEIVED BY- DJS
TYPE SAMPLE- Grab

ANALYSIS	METHOD	SAMPLE PREP DATE	BY	ANALYSIS DATE	TIME	BY	RESULT	UNITS
PCB'S IN WIPE	DOH 312-3	08/18/00	DG	08/25/00		BLD		
AROCLOR 1221	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 30	ug/wipe
AROCLOR 1232	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 30	ug/wipe
AROCLOR 1242/1016	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 30	ug/wipe
AROCLOR 1248	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 30	ug/wipe
AROCLOR 1254	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 30	ug/wipe
AROLCOR 1260	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 30	ug/wipe

Note: Elevated Detection Limits due to sample matrix interference.

NYSDOH LAB ID NO. 11246

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CES Certified Environmental Services, Inc.

1401 Erie Blvd. East
Syracuse, NY 13210
Phone 315-478-2374
Fax 315-478-2107

REPORT OF ANALYSES

PROJECT NAME: PCB Inspection
DATE: 08/29/2000

Rexam DSI
Bridge Street
Brownville, NY 13615-
Attn: Mr. Mark Lappies

SAMPLE NUMBER- 226546
DATE SAMPLED- 08/11/00
DATE RECEIVED- 08/14/00
TIME RECEIVED- 0930

SAMPLE ID- RD-811-23/1st Fl-Stained Floor
SAMPLER- Nicole Copeland
DELIVERED BY- Nicole Copeland

SAMPLE MATRIX- OT
TIME SAMPLED- 1410
RECEIVED BY- DJS
TYPE SAMPLE- Grab

ANALYSIS	METHOD	SAMPLE PREP DATE	BY	ANALYSIS DATE	TIME	BY	RESULT	UNITS
PCB'S IN WIPE	DOH 312-3	08/18/00	DG	08/25/00		BLD		
AROCLOR 1221	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1232	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1242/1016	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1248	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1254	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROLCOR 1260	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe

NYSDOH LAB ID NO. 11246

APPROVED BY: _____

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CES Certified Environmental Services, Inc.

1401 Erie Blvd. East
Syracuse, NY 13210
Phone 315-478-2374
Fax 315-478-2107

REPORT OF ANALYSES

Rexam DSI
Bridge Street
Brownville, NY 13615-
Attn: Mr. Mark Lappies

PROJECT NAME: PCB Inspection
DATE: 08/29/2000

SAMPLE NUMBER- 226547
DATE SAMPLED- 08/11/00
DATE RECEIVED- 08/14/00
TIME RECEIVED- 0930

SAMPLE ID- RD-811-24/1st Fl-Pump
SAMPLER- Nicole Copeland
DELIVERED BY- Nicole Copeland

SAMPLE MATRIX- OT
TIME SAMPLED- 1420
RECEIVED BY- DJS
TYPE SAMPLE- Grab

ANALYSIS	METHOD	SAMPLE PREP DATE	BY	ANALYSIS DATE	TIME	BY	RESULT	UNITS
PCB'S IN WIPE	DOH 312-3	08/18/00	DG	08/25/00		BLD		
AROCLOR 1221	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1232	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1242/1016	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1248	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROCLOR 1254	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe
AROLCOR 1260	DOH 312-3	08/18/00	DG	08/25/00		BLD	< 1.5	ug/wipe

NYSDOH LAB ID NO. 11246

APPROVED BY: _____
(Terms and Conditions on Reverse Side)

1 of 2

39900

CES Certified Environmental Services, Inc.
1401 Erie Blvd. East
Syracuse, NY 13210
Phone 315-478-2374
Fax 315-478-2107

CHAIN OF CUSTODY RECORD

Client: Rexam OSI Phone: 782-5800
Address: Bridge St Fax:
Brownville, N.Y. 13615 P.O. #: 100067
Contact Person: Mark Lappies Project: PCB Inspection
Sampled By (print): Nicole Copeland (sign):

LAB USE ONLY CES LOG NO.	COLLECTED DATE	COLLECTED TIME	COMP	GRAB	MATRIX	CLIENT ID/ SAMPLE LOCATION	# OF CONT.	Analysis: PCB's-WIPE	COMMENTS
226524	8/11/00	1030			Wipe	RD-811-1	1	X	2nd Floor - Stained Floor
226525		1040				RD-811-2			- off pump
226526		1050				RD-811-3			- below pump
226527		1000				RD-811-4			- stained floor
226528		1110				RD-811-5			- stained floor
226529		1120				RD-811-6			- stained floor
226530		1130				RD-811-7			- stained floor
226531		1140				RD-811-8			- pump
226532		1150				RD-811-9			- concrete pad
226533		1200				RD-811-10			- machinery
226534		1210				RD-811-11			- stained floor
226535		1220				RD-811-12			3rd Floor - off pump

Relinquished By:	Date:	Time:	Received By:	Date:	Time:
Relinquished By:	Date: 8/14/00	Time: 0930	Received By Lab: Deborah Squires	Date: 8/14/00	Time: 930

White - CES's Copy • Canary - Return to Client with Report • Pink - Client's Initital Copy

LMB Reports to NYK1

39900

CES Certified Environmental Services, Inc.
1401 Erie Blvd. East
Syracuse, NY 13210
Phone 315-478-2374
Fax 315-478-2107

CHAIN OF CUSTODY RECORD

Client: Rexam DSI
Address: Broadcast. Brantville NY
Contact Person: Mark Lappies
Phone:
Fax:
P.O. #: 100067
Project: PCB Inspection

Sampled By (print): Nicole Copeland
(sign):

Analysis: PCBs - WIPE

LAB USE ONLY CES LOG NO.	COLLECTED DATE	COLLECTED TIME	COMP	GRAB	MATRIX	CLIENT ID/ SAMPLE LOCATION	# OF CONT.	COMMENTS
226536	8/10/00	1230		wipe		RD-811-13	1	X 3rd Floor - pump
226537		1246				RD-811-14		4th Floor - river pump
226538		1250				RD-811-15		1st Floor - pump
226539		1306				RD-811-16		- paper mach
226540		1310				RD-811-17		- paper machine
226541		1320				RD-811-18		- stained floor
226542		1330				RD-811-19		- pump
226543		1340				RD-811-20		- off line coater
226544		1350				RD-811-21		- inspection area
226545		1400				RD-811-22		- drill press
226546		1410				RD-811-23		- stained floor
226547		1420				RD-811-24		- pump

Relinquished By:	Date:	Time:	Received By:	Date:	Time:
Relinquished By:	Date: 8/11/00	Time: 0930	Received By Lab: Deborah Squires	Date: 8/14/00	Time: 930

White - CES's Copy • Canary - Return to Client with Report • Pink - Client's Initital Copy

CES Certified Environmental Services, Inc.

1401 Erie Blvd. East
Syracuse, NY 13210
Phone 315-478-2374
Fax 315-478-2107

REPORT OF ANALYSES

PROJECT NAME: PCB Inspection
DATE: 08/28/2000

Rexam DSI
Bridge Street
Brownville, NY 13615-
Attn: Mr. Mark Lappies

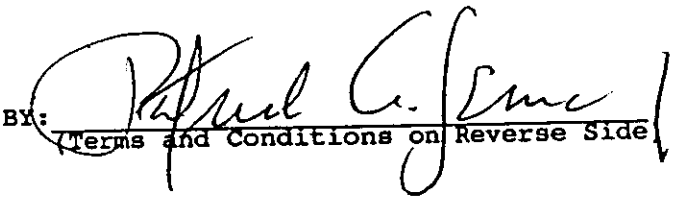
SAMPLE NUMBER- 226515
DATE SAMPLED- 08/11/00
DATE RECEIVED- 08/14/00
TIME RECEIVED- 0930

SAMPLE ID- RD-811-25/2nd Floor-Used Oil
SAMPLER- Nicole Copeland
DELIVERED BY- Nicole Copeland

SAMPLE MATRIX- OL
TIME SAMPLED- 1500
RECEIVED BY- DJS
TYPE SAMPLE- Grab

ANALYSIS	METHOD	SAMPLE PREP DATE	BY	ANALYSIS DATE	TIME	BY	RESULT	UNITS
PCB'S IN OIL	EPA 8080	08/15/00	DG	08/25/00		BLD		
AROCLOR 1221	EPA 8080	08/15/00	DG	08/25/00		BLD	< 5.0	mg/Kg
AROCLOR 1232	EPA 8080	08/15/00	DG	08/25/00		BLD	< 5.0	mg/Kg
AROCLOR 1242/1016	EPA 8080	08/15/00	DG	08/25/00		BLD	< 5.0	mg/Kg
AROCLOR 1248	EPA 8080	08/15/00	DG	08/25/00		BLD	< 5.0	mg/Kg
AROCLOR 1254	EPA 8080	08/15/00	DG	08/25/00		BLD	< 5.0	mg/Kg
AROCLOR 1260	EPA 8080	08/15/00	DG	08/25/00		BLD	< 5.0	mg/Kg

NYSDOH LAB ID NO. 11246

APPROVED BY: 

Terms and Conditions on Reverse Side

CES Certified Environmental Services, Inc.

1401 Erie Blvd. East
Syracuse, NY 13210
Phone 315-478-2374
Fax 315-478-2107

REPORT OF ANALYSES

Rexam DSI
Bridge Street
Brownville, NY 13615-
Attn: Mr. Mark Lappies

PROJECT NAME: PCB Inspection
DATE: 08/28/2000

SAMPLE NUMBER- 226516
DATE SAMPLED- 08/11/00
DATE RECEIVED- 08/14/00
TIME RECEIVED- 0930

SAMPLE ID- RD-811-26/2nd Fl-5 Gal Pink

SAMPLER- Nicole Copeland
DELIVERED BY- Nicole Copeland

SAMPLE MATRIX- OL
TIME SAMPLED- 1510
RECEIVED BY- DJS
TYPE SAMPLE- Grab

ANALYSIS	METHOD	SAMPLE PREP DATE	BY	ANALYSIS DATE	TIME	BY	RESULT	UNITS
PCB'S IN OIL	EPA 8080	08/15/00	DG	08/25/00		BLD		
AROCLOR 1221	EPA 8080	08/15/00	DG	08/25/00		BLD	< 10	mg/Kg
AROCLOR 1232	EPA 8080	08/15/00	DG	08/25/00		BLD	< 10	mg/Kg
AROCLOR 1242/1016	EPA 8080	08/15/00	DG	08/25/00		BLD	< 5.0	mg/Kg
AROCLOR 1248	EPA 8080	08/15/00	DG	08/25/00		BLD	< 5.0	mg/Kg
AROCLOR 1254	EPA 8080	08/15/00	DG	08/25/00		BLD	< 5.0	mg/Kg
AROCLOR 1260	EPA 8080	08/15/00	DG	08/25/00		BLD	< 5.0	mg/Kg

NYSDOH LAB ID NO. 11246

APPROVED BY: Richard A. Jones

(Terms and Conditions on Reverse Side)

CES Certified Environmental Services, Inc.

1401 Erie Blvd. East
Syracuse, NY 13210
Phone 315-478-2374
Fax 315-478-2107

REPORT OF ANALYSES

Rexam DSI
Bridge Street
Brownville, NY 13615-
Attn: Mr. Mark Lappies

PROJECT NAME: PCB Inspection
DATE: 08/28/2000

SAMPLE NUMBER- 226517
DATE SAMPLED- 08/11/00
DATE RECEIVED- 08/14/00
TIME RECEIVED- 0930

SAMPLE ID- RD-811-27/2nd Fl-5 Gal Dark
SAMPLER- Nicole Copeland
DELIVERED BY- Nicole Copeland

SAMPLE MATRIX- OL
TIME SAMPLED- 1520
RECEIVED BY- DJS
TYPE SAMPLE- Grab

ANALYSIS	METHOD	SAMPLE PREP DATE	BY	ANALYSIS DATE	TIME	BY	RESULT	UNITS
PCB'S IN OIL	EPA 8080	08/15/00	DG	08/25/00		BLD		
AROCLOR 1221	EPA 8080	08/15/00	DG	08/25/00		BLD	< 5.0	mg/Kg
AROCLOR 1232	EPA 8080	08/15/00	DG	08/25/00		BLD	< 5.0	mg/Kg
AROCLOR 1242/1016	EPA 8080	08/15/00	DG	08/25/00		BLD	< 5.0	mg/Kg
AROCLOR 1248	EPA 8080	08/15/00	DG	08/25/00		BLD	< 5.0	mg/Kg
AROCLOR 1254	EPA 8080	08/15/00	DG	08/25/00		BLD	< 5.0	mg/Kg
AROCLOR 1260	EPA 8080	08/15/00	DG	08/25/00		BLD	< 5.0	mg/Kg

NYSDOH LAB ID NO. 11246

APPROVED BY: _____
(Terms and Conditions on Reverse Side)

CES Certified Environmental Services, Inc.

1401 Erie Blvd. Eas
Syracuse, NY 1321(
Phone 315-478-2374
Fax 315-478-2107

REPORT OF ANALYSES

Rexam DSI
Bridge Street
Brownville, NY 13615-
Attn: Mr. Mark Lappies

PROJECT NAME: PCB Inspection
DATE: 08/28/2000

SAMPLE NUMBER- 226518
DATE SAMPLED- 08/11/00
DATE RECEIVED- 08/14/00
TIME RECEIVED- 0930

SAMPLE ID- RD-811-28/2nd Fl-5 Gal L Brown

SAMPLER- Nicole Copeland
DELIVERED BY- Nicole Copeland

SAMPLE MATRIX- OL
TIME SAMPLED- 1530
RECEIVED BY- DJS
TYPE SAMPLE- Grab

Page 1 of 1

ANALYSIS	METHOD	SAMPLE PREP DATE	BY	ANALYSIS DATE	TIME	BY	RESULT	UNITS
PCB'S IN OIL	EPA 8080	08/15/00	DG	08/25/00		BLD		
AROCLOR 1221	EPA 8080	08/15/00	DG	08/25/00		BLD	< 5.0	mg/Kg
AROCLOR 1232	EPA 8080	08/15/00	DG	08/25/00		BLD	< 5.0	mg/Kg
AROCLOR 1242/1016	EPA 8080	08/15/00	DG	08/25/00		BLD	< 5.0	mg/Kg
AROCLOR 1248	EPA 8080	08/15/00	DG	08/25/00		BLD	< 5.0	mg/Kg
AROCLOR 1254	EPA 8080	08/15/00	DG	08/25/00		BLD	< 5.0	mg/Kg
AROCLOR 1260	EPA 8080	08/15/00	DG	08/25/00		BLD	< 5.0	mg/Kg

NYSDOH LAB ID NO. 11246

APPROVED BY: _____

(Terms and Conditions on Reverse Side)

39898

CES Certified Environmental Services, Inc.

1401 Erie Blvd. East
Syracuse, NY 13210
Phone 315-478-2374
Fax 315-478-2107

CHAIN OF CUSTODY RECORD

Client: Rexam OSI Phone: 782-5800

Address: Bridge St. Brainville NY 13615 Fax:

P.O. #: 100067

Contact Person: Mark Lappies Project: PCB Inspection

Sampled By (print): Nicole Copeland (sign):

Analysis: PCBs - oil

LAB USE ONLY CES LOG NO.	COLLECTED DATE	COLLECTED TIME	COMP	GRAB	MATRIX	CLIENT ID/ SAMPLE LOCATION	# OF CONT.	COMMENTS
226515	8/11/00	1500		X	Oil	RD-811-25	1	2nd Floor - Used Oil Container - 5gallon - Paint
226516		1510				RD-811-26		- 5gallon - Paint
226517		1520				RD-811-27		- 5gallon - Paint
226518		1530				RD-811-28		- 5gallon - Paint

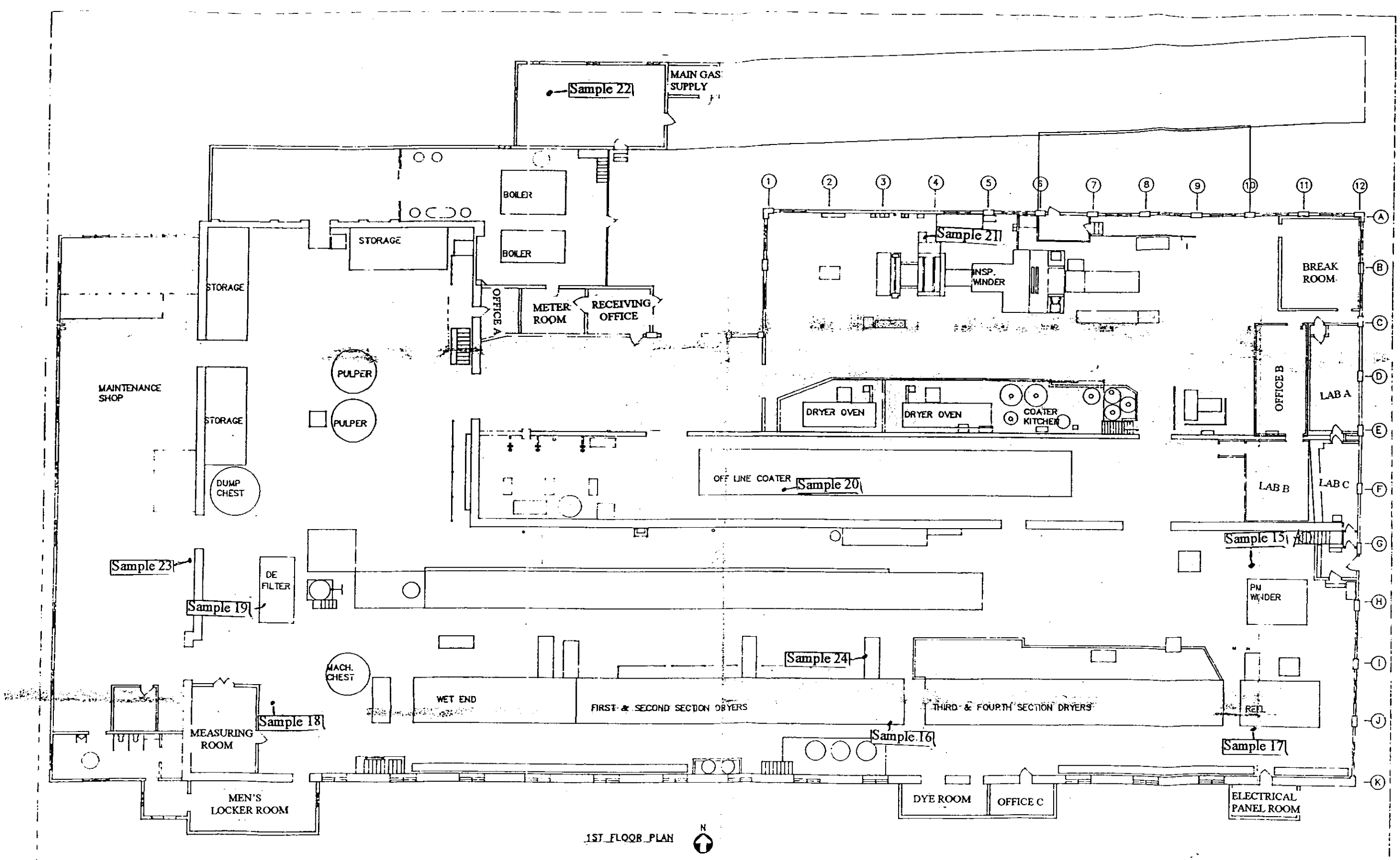
Relinquished By:	Date:	Time:	Received By:	Date:	Time:
Relinquished By:	Date: 8/14/00	Time: 930	Received By Lab: Deborah Squires	Date: 8/14/00	Time: 930

White - CES's Copy • Canary - Return to Client with Report • Pink - Client's Initial Copy

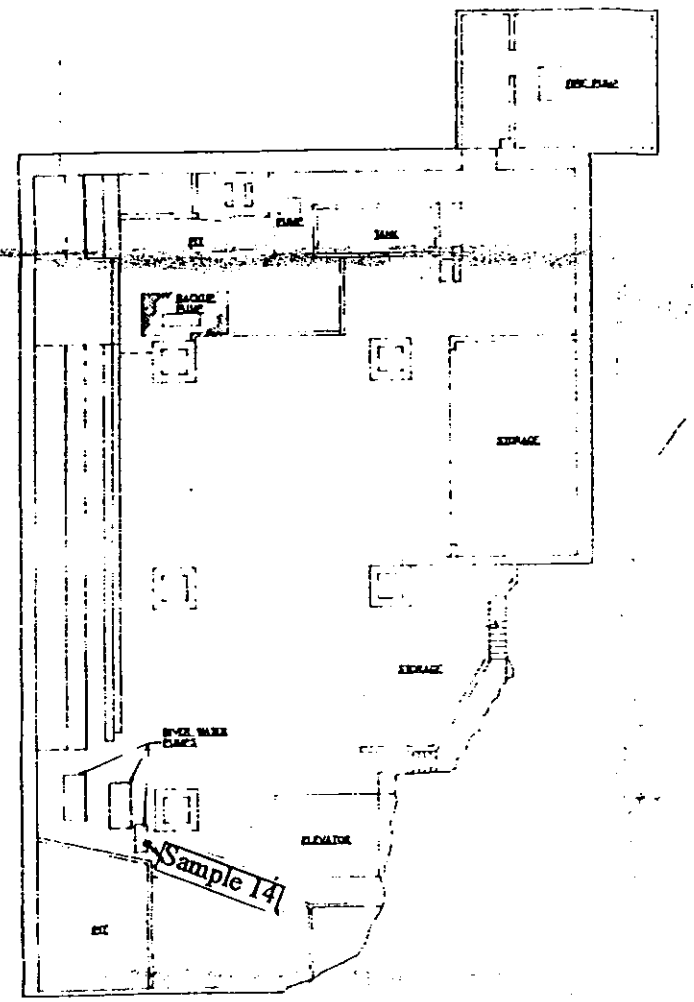
CES

ATTACHMENT B

Project Drawings

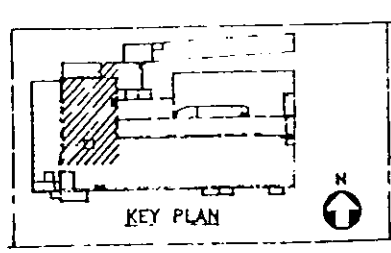


Note: The original drawing were provided by Rexam DSI and were modified only for the purpose of this report as a reference tool. The drawing is NOT TO SCALE.

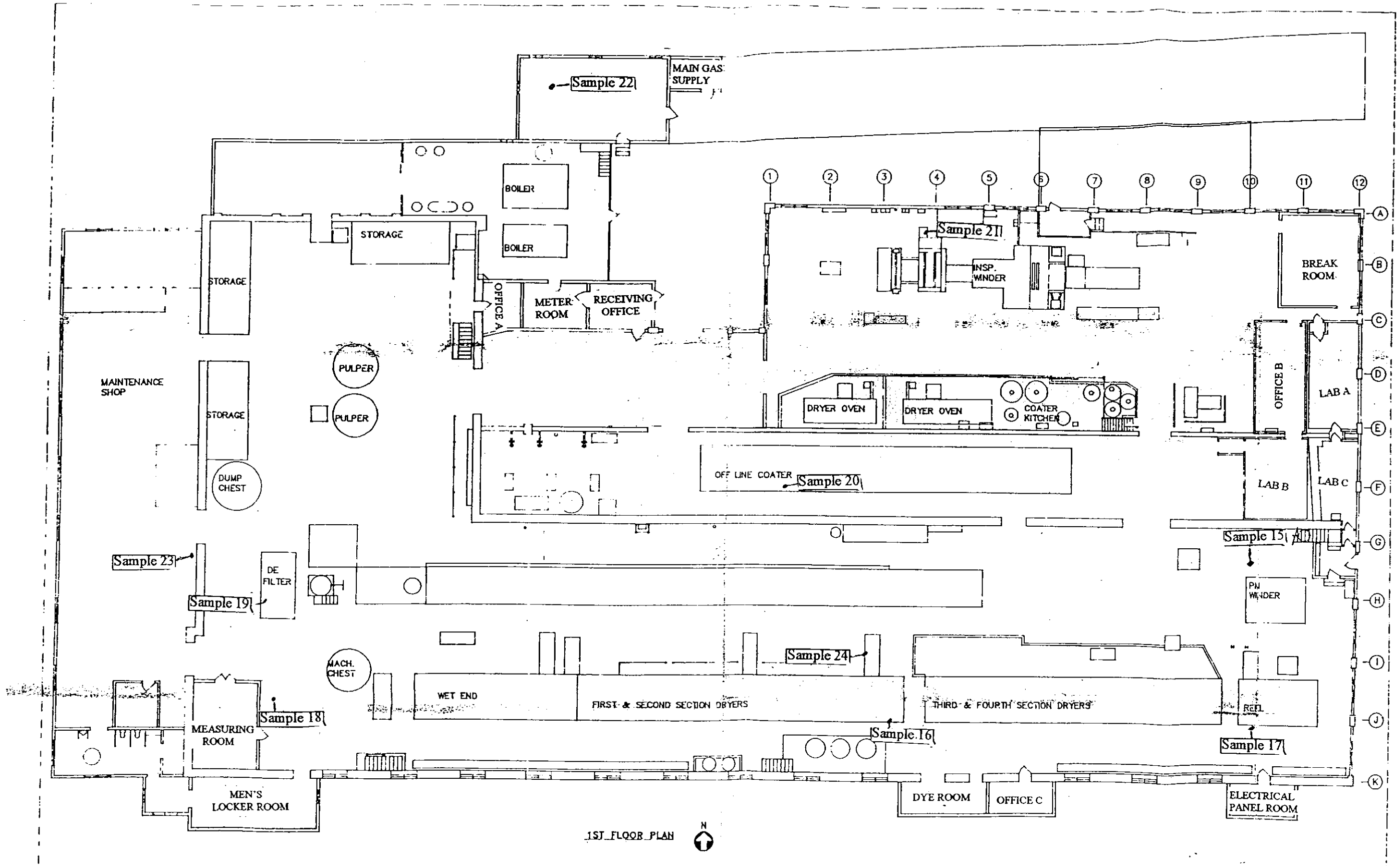


4TH FLOOR PLAN

Note: The original drawing were provided by Rexam DSI and were modified only for the purpose of this report as a reference tool. The drawing is NOT TO SCALE.



REXAM DSI
BRIDGE ST. BROWNVILLE, N.Y. 13615
PROJECT:
REXAM DSI RENOVATIONS
DRAWING:
4TH FLOOR PLAN
M-4



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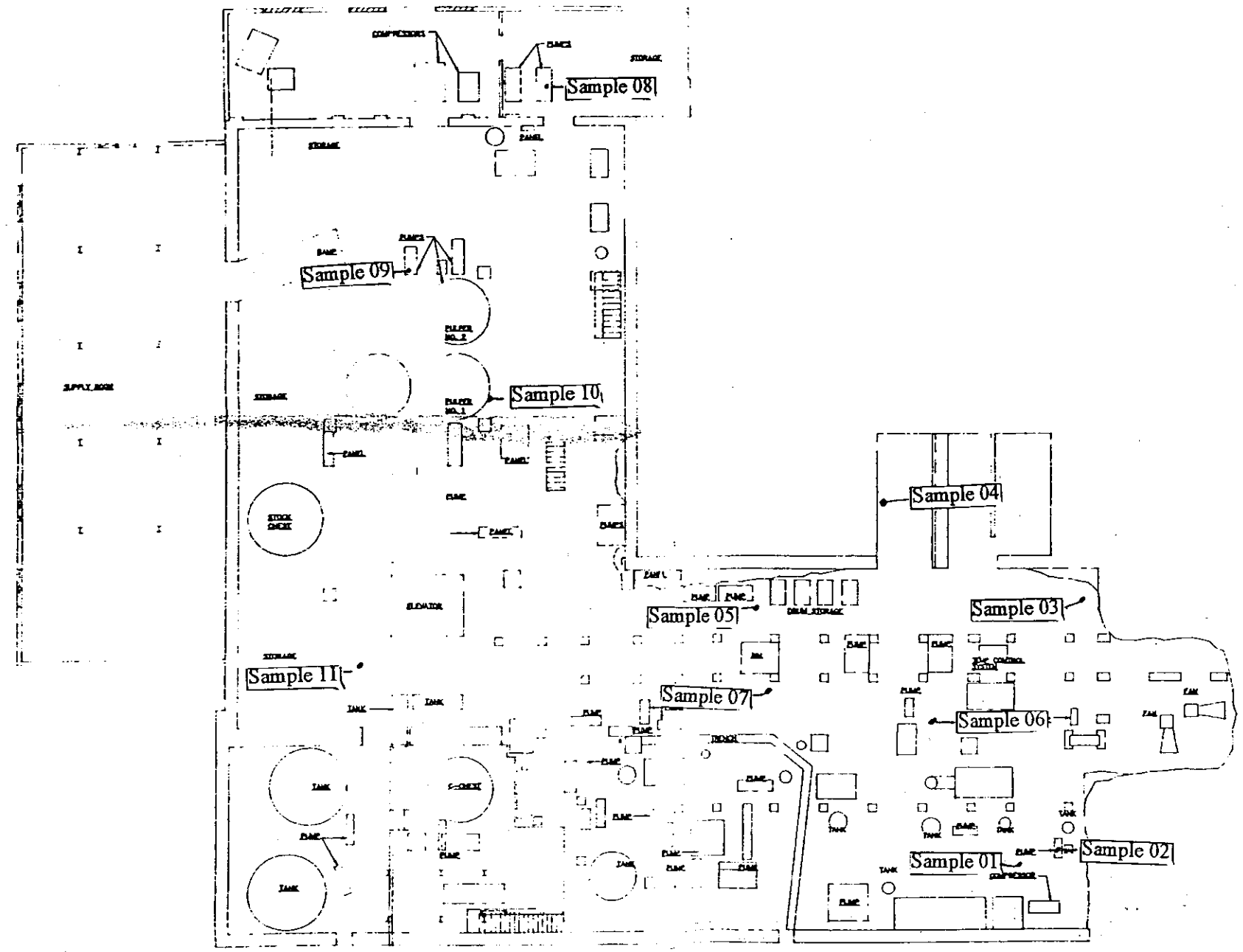
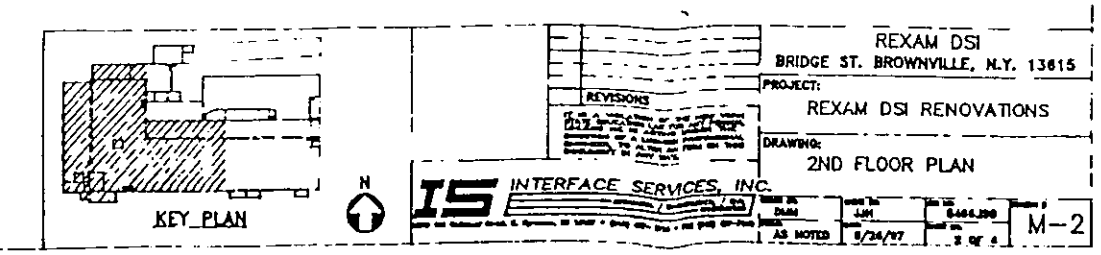
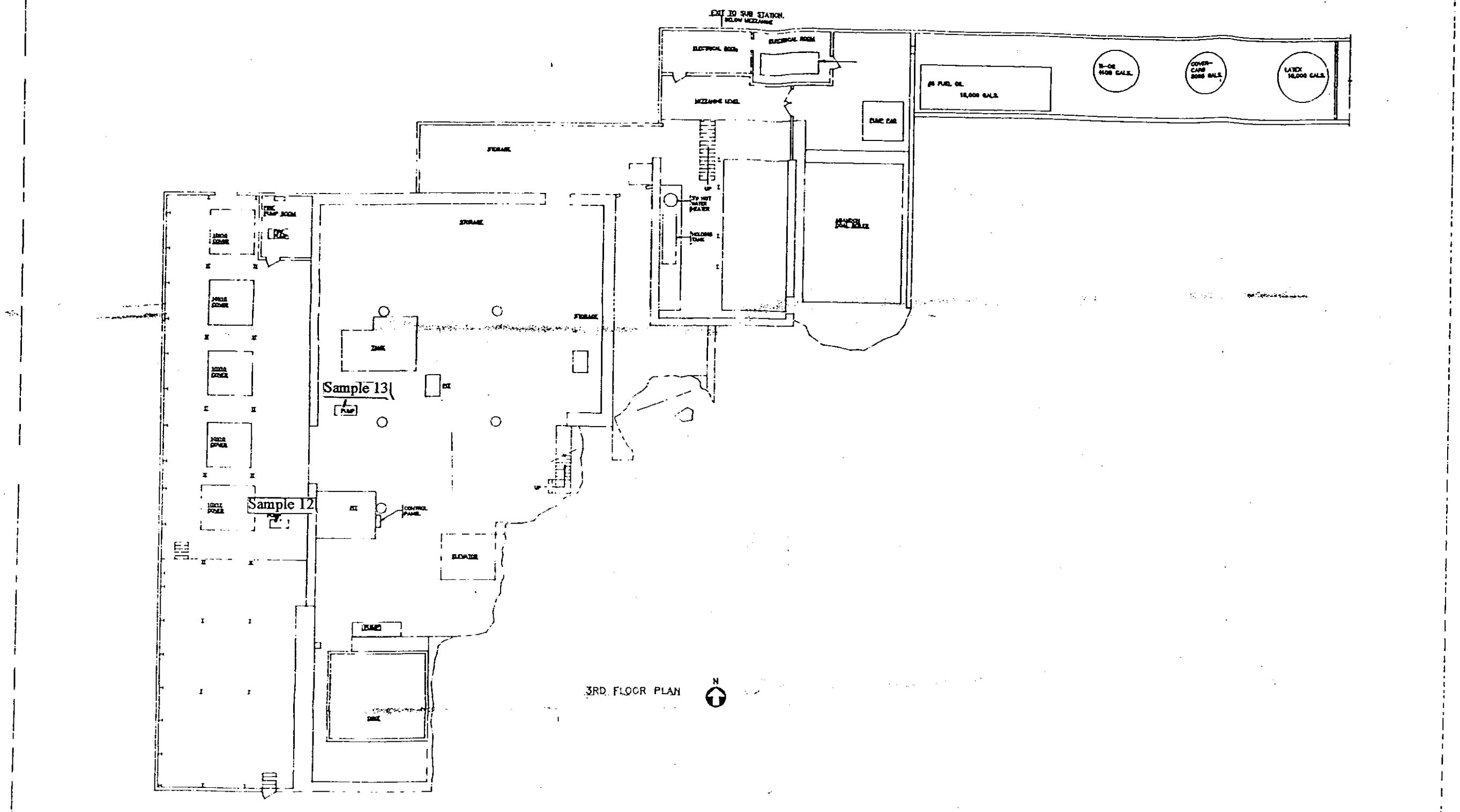


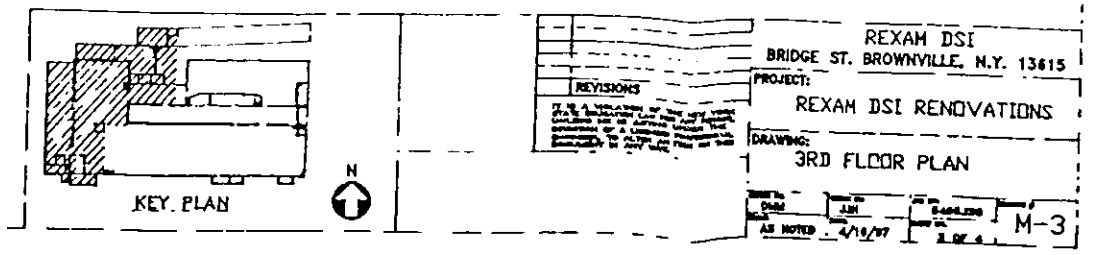
2ND FLOOR PLAN

Note: The original drawing were provided by Rexam DSI and were modified only for the purpose of this report as a reference tool. The drawing is NOT TO SCALE.





Note: The original drawing were provided by Rexam DSI and were modified only for the purpose of this report as a reference tool. The drawing is NOT TO SCALE.



TSI®
TRANSFORMER SERVICE, INC.
74 REGIONAL DR. • P.O. BOX 1077 • CONCORD, N.H. 03302-1077
(603) 224-4006
FAX (603) 228-2430

August 19, 1994

Mr. Larry Farrell
Lewis & Clinch, Inc.
Industrial Electric Division
321 Hawk Street
Watertown, New York 13601

RE: Standard Screen and PCB Analysis Results
TSI Quotation Number 28135

438 GALLONS/UNIT

Dear Mr. Farrell:

We have enclosed data sheets, listing the test results from the three (3) mineral oil samples received by our laboratory on July 21, 1994. All three samples revealed acceptable standard screen test results, with the exception of elevated dissolved moisture contents; the current levels of 38, 60 and 41ppm all exceed the recommended limit (of 30ppm) for this type of electrical equipment. We recommend dehydrating the oil in these units, and have enclosed a quotation for this service, for your review.

PCB analysis of the samples revealed that all three (3) of these transformers contain insulating fluid with less than 50ppm PCB. Based on these results, we have enclosed three (3) blue "NON-PCB" labels for you to affix on these units.

Technical aspects of this report have been prepared by Todd M. Bullock, Senior Project Estimator.

Should you have any questions concerning this report, please do not hesitate to contact Mr. Walter P. Sword, Inside Sales Representative, or myself at this office.

Thank you for allowing us this opportunity to serve you.

Sincerely,

Kenneth G. Price III
Kenneth G. Price
Sales Manager

KGP/tlv
Enclosures

TRANSFORMER SERVICE, INC.
74 REGIONAL DR. • P.O. BOX 1077 • CONCORD, N.H. 03302-1077
(603) 224-4006
FAX (603) 228-2430

PCB ANALYSIS RESULTS

Job #: 28066 Batch #: 1 Customer: LEWIS & CLINCH
Date Collected: 07/15/94 City, State: WATERTOWN, NY
Date Received: 07/21/94 Date Completed: 07/22/94
Time Collected: 9AM By: LARRY FARRELL

Ln#	Samples ID	Matrix	PPM	PPB	ug/100cmsq
1	#1	OIL	4		
2	#2	OIL	<2		
3	#3	OIL	<2		

MATRIX	METHOD
Oil, Soil, Wipe	ASTM D4059
Water	EPA 608

Authorized Signature Barbara J. Porter
Barbara J. Porter
Laboratory Director
07/26/94

'PPM' = PCB's in Parts per Million
'PPB' = PCB's in Parts per Billion
'ug/100cmsq' = PCB's in Micro Grams per 100 Square Centimeters

TSI®

TRANSFORMER SERVICE, INC.

ELECTRICAL EQUIPMENT INSPECTION SERVICE

CUSTOMER: LEWIS & CLINCH, INC.
WATERTOWN, NY

DATE RECEIVED: 07-21-94
DATE TESTED: 07-25-94

ID NUMBER/ LOCATION	COLOR	VISUAL	PCB CONTENT	IFT	NEUTRAL NUMBER	DIELECTRIC STRENGTH	MOISTURE CONTENT	TCG CONTENT	SPECIFIC GRAVITY	QUALITY FACTOR
S/N 5064283 1000kVA WESTINGHOUSE TRANSFORMER	0.5	PART.	4	34.2	.020	45	38		.869	BORD.
S/N 5064284 1000kVA WESTINGHOUSE TRANSFORMER	0.5	PART.	<2	35.4	.015	38	60		.869	POOR
S/N 5064282 1000kVA WESTINGHOUSE TRANSFORMER	0.5	SED.	<2	35.0	.025	24	41		.869	POOR

OIL TREATMENT
QUOTATION

TRANSFORMER SERVICE, INC.
74 REGIONAL DRIVE - P.O. BOX 1077
CONCORD, NH 03302-1077

CUSTOMER: LEWIS & CLINCH, INC.
WATERTOWN, NY

DATE: 08-19-94
TSI QUOTE NO: 28135

GENTLEMEN:

WITH REFERENCE TO YOUR TEST DATA, WE RECOMMEND THE FOLLOWING SERVICE: DEGAS THE EXISTING OIL TO REMOVE DISSOLVED COMBUSTIBLE GASSES, AND IMPROVE OVERALL FLUID QUALITY

TEST NUMBER	SHUTDOWN REQUIREMENTS	TEST NUMBER	SHUTDOWN REQUIREMENTS
3, 4 AND 5	12 TO 16 HOURS PER UNIT*		

* SHUTDOWNS MAY BE REDUCED OR ELIMINATED, DEPENDING ON LOCATION OF FILTER HOSE CONNECTIONS AND OIL CONDITIONS AT TIME OF SERVICE

SHUTDOWNS INCLUDED IN OUR QUOTATIONS ARE ESTIMATES FOR SERVICE WORK ONLY. SOME PROVISION FOR SWITCHING TO ISOLATE AND LATER RESTORE POWER SHOULD BE ADDED.

PRICE: $6,925.00

PLUS: MAKE UP OIL AT $6.00/GALLON; SALES & USE TAXES ARE NOT INCLUDED, IF APPLICABLE

NOTE: ALL PRICES ARE BASED ON THE ASSUMPTION THAT THE CUSTOMER WILL FURNISH AN ELECTRICIAN OR GUIDE TO DIRECT OUR SERVICE CREW TO TRANSFORMER LOCATIONS AND THAT THERE WILL BE A MINIMUM OF DELAY DUE TO PLANT TRAFFIC, RAILROAD CARS, ETC...

TSI MAINTAINS STRICT SAFETY REGULATIONS AT ALL TIMES. FINAL DECISION AS TO WHETHER OR NOT A UNIT IS SAFE TO SERVICE WHILE ENERGIZED IS LEFT TO THE DISCRETION OF OUR FOREMAN ON THE JOB.

THIS QUOTATION IS FIRM IN ITS RATES FOR NINETY (90) DAYS. PLEASE REFER TO THE ENCLOSED FIELD SERVICE AND FLUID TREATMENT TERMS AND CONDITIONS AND TRANSFORMER OIL TREATMENT SERVICE BULLETINS

BY: Kenneth G. Price IV
KENNETH G. PRICE IV
SALES MANAGER

PCB'S

DOES THE MILL HAVE PCBS ON THE PROPERTY? No

IF YES, COMPLETE THE FOLLOWING:

1) TYPES OF PCB UNITS

		QUANTITY
a) PCB TRANSFORMERS:	No	0
b) PCB CONTAMINATED TRANSFORMERS:		0
c) PCB CAPACITORS:	No	0
d) PCB CONTAMINATED HYDRAULIC SYSTEMS:	No	
e) PCB CONTAMINATED ELECTROMAGNETS:	No	

2) HAVE ALL NON-PCB TRANSFORMERS BEEN TESTED FOR PCBS? NA - all dry type

IS NON-PCB CERTIFICATION AVAILABLE? NA

3) ARE PCB LABELS IN PLACE ON:

a) ALL PCB TRANSFORMERS? NA

b) ALL ACCESS POINTS TO PCB TRANSFORMERS? NA

c) ALL PCB CAPACITORS? NA

d) OTHER EQUIPMENT AS NEEDED? NA

4) ARE ROUTINE INSPECTIONS CONDUCTED? NA QUARTERLY? NA YEARLY? NA

5) ARE RECORDS OF ALL INSPECTIONS KEPT? NA

6) ARE ANNUAL PCB DOCUMENTS AVAILABLE STARTING WITH 1978? No

7) ARE EMERGENCY SPILL REPORTING PROCEDURES IN PLACE? NA

8) IS A WRITTEN PCB SPILL PLAN AVAILABLE? No

9) HAS THE LOCAL FIRE DEPARTMENT BEEN GIVEN A LIST OF PCB TRANSFORMERS AND THEIR LOCATIONS? NA DATE OF NOTICE? NA

10) ARE TRANSFORMERS CONTAINED BY CURBS OR DIKES? NA

11) IS THE FLOOR UNDER A TRANSFORMER EPOXY COATED? NA

12) DOES THE MILL HAVE A PCB STORAGE AREA? NA IS IT LABELED? NA

13) WHERE ARE PCB SOLIDS DISPOSED OF?

a) COMPANY: NA

b) ADDRESS:

c) EPA ID #

d) ARE MANIFEST RECORDS AND CERTIFICATE OF DISPOSAL AVAILABLE? Yes

14) WHERE ARE PCB LIQUIDS DISPOSED OF?

a) COMPANY: NA

b) ADDRESS:

c) EPA ID #

d) ARE MANIFEST RECORDS AND CERTIFICATE OF DESTRUCTION AVAILABLE?

15) HAVE ANY PCB TRANSFORMERS BEEN RETROFILLED? No

HAVE THE PROPER TEST CONDITIONS FOR RECERTIFICATION BEEN MET?

IS A TEST ANALYSIS AVAILABLE?

COMMENTS: Mill is PCB free as of 7/1/87. The capacitors were incinerated. There are 3 Niagara-Mohawk transformers with PCB <50ppm.

COMPLIANCE STATUS:

FOLLOW UP REQUIRED: None

RESPONSIBLE MILL CONTACT:

NAME: Joseph J. Litsermeyer

DEPT: Engineering

TELE: 315-782-5800

DOES MILL HAVE TRANSFORMER OR CAPACITORS THAT CONTAIN PCB OR ARE PCB CONTAMINATED? YES_____ NO X

HAS FRED CORMACK VISITED THE MILL? YES X NO_____
IF YES, REVIEW REPORT AND DESCRIBE COMPLIANCE STATUS:

The mill had several PCB filled capacitors which were removed from the mill property in 1987.

HAS PLAN BEEN PRESENTED TO LOCAL FIRE DEPT? YES_____ NO Not Require

ARE QUARTERLY INSPECTION CONDUCTED? YES_____ NO Not Require

HAVE ANNUAL REPORTS BEEN PREPARED? YES X NO_____

HOW IS PCB DISPOSED OF?

-PCB-LIQUID:

NAME OF FIRM:_____
ADDRESS OF FIRM:_____

CONTACT PERSON:_____
TELEPHONE:_____

-PCB-ITEMS:

NAME OF FIRM: Transformer Service Inc.
ADDRESS OF FIRM: 74 Regional Drive
Concord, NH 03301
CONTACT PERSON: Andy Serzans
TELEPHONE: 603-224-4006

COMPLIANCE SUMMARY:

No PCB's in the mill.

PROBLEMS:

- There are three PCB contaminated transformers located on mill property owned by Niagara Mohawk. The transformers are marked.
- The mill has not received the final manifest from TSI documenting that the PCB's have been incinerated.

FOLLOW-UP REQUIRED:
See Attached Sheet

5. PCB

FOLLOW-UP:

Earl Hanson called up Andy Serzans of TSI on May 6, 1988 to review the status of the PCB capacitors removed on July 1, 1987.

TSI removed the PCB's under Manifest #NHC0005211 on 7/1/87 and sent back a copy on 7/10/87 on receiving at their storage facility where weight of 835 lbs. was confirmed. On October 19, 1987, the item was sent to Rollins in Deerpark, TX for destruction. TSI has not received a certificate of destruction and will send us a copy when they get it. They indicated that it is not unusual for it to take this long.

Earl Hanson called Fred Cormack to review whether or not we had any responsibility for the three PCB contaminated transformers located on our property that are owned by Niagara Mohawk. Fred indicated that we are not responsible for transformers owned by a utility provided we are not leasing the equipment and do not have access. It is my understanding that these transformers contain PCB between the range of 50 to 500 ppm and are therefore PCB contaminated. As such, they do not require labeling.

JAMES RIVER CORPORATION

Location BROWNVILLE

Date Completed MAY 1 1987 By RICK WILSON

updated 2/23/93

TRANSFORMER INVENTORY

(1)

Item No.	KVA	Make	Serial No.	In-Mill Location	Gal Fluid	Fluid Name	ppm PCB	Test Reference	Category	Kg. Fluid	Insp. Order	Comments
★ 7	15	G.E.	DR	3rd Floor By STAIRWAY	DRY				TYPE QM			LIGHTING
8	1	G.E.	12	2nd Floor By no2 WHITEWATER chest	DRY				TYPE QB			AIR DRYER
9	1	G.E.	12	"	DRY				TYPE QB			AIR DRYER
13	3	Westinghouse	STYLE 923B701A	LINESHAFT Switchgear Room	DRY				TYPE EP			LIGHTING
14	7.5	Westinghouse	Design No. 6E178	BACK ROOM By BATH Room	DRY				—			LIGHTING
15	5	Sylvania	CAT. NO. 507-514	SWITCHGEAR BY Lockeroom	DRY				—			BARREL ROLL UNIT DRIVES
16	5	Sylvania	CAT NO. 507-514	"	DRY				—			BARREL ROLL UNIT DRIVES
17	15	Westinghouse	Design No. 6E 364	BOTTOM STAIRWAY no1 machine	DRY				TYPE EP			LIGHTING REZILDAR INSULATED
18	25	AWL	P. No. 161-209-3	Switchgear BY Reel no1 mach	DRY				Model 23814			SPARE
19	25	AWL	—	" " "	DRY				Model 23817			SPARE

1 Most nameplate data are in gallons.
Your annual summary must be in kilograms, PCB and PCB contaminated only. (gal. PCB X 5.9 = Kg., gal. oil X 3.6 = Kg.).

★ NUMBER 1 TO 6 ARE NOT USED IN THIS SURVEY

JAMES RIVER CORPORATION

Location BROWNVILLE.

Date Completed MAY 1, 1987 By RICK WILSON

TRANSFORMER INVENTORY

Item No.	KVA	Make	Serial No.	In-Mill Location	Gal (1) Fluid	Fluid Name	ppm PCB	Test Reference	Category	Kg. Fluid	Insp. Order	Comments
20	75	AWL	P.N. 161-209-4	Switchgear By Reel No1 mach	DRY				model 23816			Calender
21	25	AWL	P.N. 161-209-3	"	DRY				model 23814			Reel
22	10	AWL	P.N. 161-209-1	"	DRY				model 23813			SATURATOR
23	25	AWL	P.N 161-209-3	"	DRY				model 23814			Dryer 4
24	25	AWL	P.N. 161-209-3	"	DRY				model 23814			Dryer 3
									-			
26	10	Westinghouse	S60N113108	Behind Center opr. STATION	DRY				TYPE EP			Lighting
27	15	G.E.	MK	"	DRY				TYPE QM			Lighting
28	15	G.E.	MK	"	DRY				TYPE QM			Lighting
29	10	G.E.	LK	"	DRY				TYPE QM			Lighting
30	15	G.E	MK	"	DRY				TYPE QM			Lighting
31	25	Westinghouse	Design No. 6B882	Wall Behind center STATION NO2	DRY				TYPE EP			Solar Heaters
32	25	Westinghouse	Design No. 6B882	" "	DRY				TYPE EP			Solar Heaters

1 Most nameplate data are in gallons.
Your annual summary must be in kilograms, PCB and PCB contaminated only (gal. PCB X 5.9 = Kg., gal. oil X 3.6 = Kg.).

JAMES RIVER CORPORATION

Location BROWNVILLE

Date Completed MAY 1 1987 By RICK WILSON

TRANSFORMER INVENTORY

Item No.	KVA	Make	Serial No.	In-Mill Location	Gal Fluid (1)	Fluid Name	ppm PCB	Test Reference	Category	Kg. Fluid	Insp. Order	Comments
33	75	UTILITY	A3-5381	Center Room	DRY				TYPE BS			Lighting
34	3	Westinghouse	Design no. 6E176	Behind Trimmer	DRY				TYPE EP			Lab AIR cond.
35	3	Westinghouse	D.# 6E176	" "	DRY				TYPE EP			Lab AIR cond.
36	3	Westinghouse	D.# 6E176	" "	DRY				TYPE EP			Lab AIR cond.
37	3	G.E.	9T51Y93	Under center Burners	DRY				—			Lighting
38	5	G.E.	GR	" "	DRY				TYPE QM			Fife guides
39	5	G.E.	GR	" "	DRY				TYPE QM			Fife guides
40	45	Westinghouse	T781789	Behind Insp. winder	DRY				DT-3			Reliance - Drive Insp. Winder
41	3	GS	HS10E38	"	DRY				HS			Rider - Roll Drive
42	3	GE	12	Switchgear By Reel no 1 mach.	DRY				—			440 V 3ph Power supply
43	3	GE	12	"	DRY				—			440 V 3ph Power Supply
44	15	Meltran	1584	Outside wall Elect. Room	DRY				TYPE 0431			SPARE
45	15	Meltran	1582	Outside wall O Elect. Room	DRY				TYPE 0431			SPARE

1 Most nameplate data are in gallons.
Your annual summary must be in kilograms, PCB and PCB contaminated only (gal. PCB X 5.9 = Kg., gal. oil X 3.6 = Kg.).

JAMES RIVER CORPORATION

Location BROWNVILLE

Date Completed MAY 1 1987 By RICK WILSON

TRANSFORMER INVENTORY

Item No.	KVA	Make	Serial No.	In-Mill Location	Gal Fluid (1)	Fluid Name	ppm PCB	Test Reference	Category	Kg. Fluid	Insp. Order	Comments
46	15	NEELTRAN	1563	OUTSIDE WALL ELECT. ROOM	DRY				TYPE 0431			REEL-(COATER)
47	60	NEELTRAN	1555	" "	DRY				TYPE 0432			CALENDER (COATER)
48	?	CONTROL TRANS. CORP	45501	" "	DRY				—			CHOKE (2 MILL HEAT TR @ 100 AMPS
49	3	GE	model # 9T51Y93	" "	DRY				—			COATER ~~Reboom~~ over CONTROL TRANS.
50	7.5	WESTINGHOUSE	D.# S60G11507A	BEATER ROOM	DRY				TYPE EP			LIGHTING
51	7.5	WESTINGHOUSE	D.# S60G11507A	" "	DRY				TYPE EP			LIGHTING
52	10	WESTINGHOUSE	D.# T65179	FOREMANS OFFICE	DRY				TYPE EP			LIGHTING
53	10	WESTINGHOUSE	D.# S60G11510D	ABOVE OFFICE STAIRWAY	DRY				TYPE EP			HEATING
54	10	WESTINGHOUSE	D.# S60G11510D	" "	DRY				TYPE EP			HEATING
55	10	WESTINGHOUSE	D.# S60G11510D	" "	DRY				TYPE EP			HEATING
56	15	WESTINGHOUSE	STYLE # 145 3118C	CARPENTER SHOP	DRY				TYPE AVR			LIGHTING
57	2.5	WESTINGHOUSE	S60J15235E	LENNOX ROOM	DRY				TYPE EP			LIGHTING (AE211D4R INSULATED)

1 Most nameplate data are in gallons.
Your annual summary must be in kilograms, PCB and PCB contaminated only (gal. PCB X 5.9 = Kg., gal. oil X 3.6 = Kg.).

JAMES RIVER CORPORATION

Location Brownville

Date Completed 2/23/93 By R.Wilson

TRANSFORMER INVENTORY

Item No.	KVA	Make	Serial No.	In-Mill Location	Gal Fluid (1)	Fluid Name	ppm PCB	Test Reference	Category	Kg. Fluid	Insp. Order	Comments
58	30	Westinghouse	J60B0888	2nd Floor By High Pressure Pump	DRY				TYPE EPT			230 3ph Power
59	175	Square D	193888	Over Measurex Room	DRY				50			Fan Pump Drive
60	10	Acme	T-1-69438	"	DRY				—			Computer Power
61	15	"	T-2-53617-15	"	DRY				—			" "
62	40	Rex	11-0153	"	DRY				Askarel			Dryer 2 Drive
63	34	Heavy-Duty	205507-2	"	DRY				—	Class AA		Wire Drive
64	34	" "	203307-1	"	DRY				—	Class AA		Press Drive
65	75	" "	203306	"	DRY				—	AA		Dryer 1 Drive
66	75	AED	T-893860	567 Dry End of Mach.	DRY				—	AA		4th Section Drive
67	5	Heavy Duty	9337070T00	"	DRY				HDT-3			Rife Guide Winder
68	45	Westinghouse	J92-E2428	"	DRY				—	AA		Mach Winder Drive
69	15	Westinghouse	J91-E0484	Behind Center Operator Station	DRY				EP			50% Lab Power.
70	50	Acme	7335	Lab Behind Center Station #2	DRY				—	—		480 3ph Power.

1 Most nameplate data are in gallons.
Your annual summary must be in kilograms, PCB and PCB contaminated only (gal. PCB X 5.9 = Kg., gal. oil X 3.6 = Kg.).

JAMES RIVER CORPORATION

Location Brownsville

Date Completed 2/23/93 By R. Wilson

TRANSFORMER INVENTORY

Item No.	KVA	Make	Serial No.	In-Mill Location	(1) Gal Fluid	Fluid Name	ppm PCB	Test Reference	Category	Kg. Fluid	Insp. Order	Comments
71	50	ACME	7335	Wall Behind Cooper Station #2	DRY.				—	≤1135		440 3ph Powe
72	15	Westinghouse	J92-61964	MAINT - Shop	DRY.				EP			Lighting
73	15	G.E.	DR	Boiler office	DRY				—	—		Lighting
74	20	Square D	093B925-A-001	Outside Wall Cooper Electric Room	DRY					AA		Suction Roll DR
75	40	Rex	U-1221	" "	DRY				ANN			Inspection windo

1 Most nameplate data are in gallons.
Your annual summary must be in kilograms, PCB and PCB contaminated only (gal. PCB X 5.9 = Kg., gal. oil X 3.6 = Kg.).

APPENDIX 33

Material Inventory

PART'S PERIOD USAGE REPORT

SORTED BY CLASS CODE, PART NUMBER
FOR A MAXIMUM OF 12 PREVIOUS PERIODS

SS CODE: 170
RM - PULP

T NUMBER	DESCRIPTION	A B C	STANDARD UNIT COST	PERIOD NUMBER	START DATE OF PERIOD	END DATE OF PERIOD	USAGE DURING PERIOD	EXTENDED COST
32	MACKENZIE MK-90P SOFTWOOD		139.2800	Current	05/08/00	05/12/00	0.000	0.0000
				86	04/03/00	05/05/00	0.000	0.0000
				85	03/06/00	03/31/00	0.000	0.0000
				84	02/07/00	03/03/00	0.000	0.0000
				83	01/03/00	02/04/00	0.000	0.0000
				82	11/29/99	12/31/99	0.000	0.0000
				81	11/01/99	11/24/99	0.000	0.0000
				80	09/27/99	10/29/99	0.000	0.0000
				79	08/30/99	09/24/99	0.000	0.0000
				78	08/02/99	08/27/99	0.000	0.0000
				77	06/26/99	07/30/99	0.000	0.0000
				76	06/01/99	06/25/99	0.000	0.0000
				75	05/03/99	05/28/99	0.000	0.0000
					TOTAL SINCE	05/03/99:	0.000	0.0000
				AVERAGE FOR	05/03/99-	05/05/00:	0.000	0.0000
43	GRANDE PRAIRIE SOFTWOOD		180.8700	Current	05/08/00	05/12/00	282.500	51095.7750
				86	04/03/00	05/05/00	1535.000	277635.4500
				85	03/06/00	03/31/00	1255.000	226991.8500
				84	02/07/00	03/03/00	1323.500	239381.4450
				83	01/03/00	02/04/00	1654.000	299158.9800
				82	11/29/99	12/31/99	1305.500	236125.7850
				81	11/01/99	11/24/99	1183.500	214059.6450
				80	09/27/99	10/29/99	1786.750	323169.4725
				79	08/30/99	09/24/99	1565.250	283106.7675
				78	08/02/99	08/27/99	585.500	105899.3850
				77	06/26/99	07/30/99	1899.000	343472.1300
				76	06/01/99	06/25/99	1209.500	218762.2650
				75	05/03/99	05/28/99	1377.500	249148.4250
					TOTAL SINCE	05/03/99:	16962.500	3068007.3750
				AVERAGE FOR	05/03/99-	05/05/00:	1390.000	251409.3000
78	NYLON 1/4"x3dmf MINIFIBERS		1.5795	Current	05/08/00	05/12/00	0.000	0.0000
				86	04/03/00	05/05/00	5100.000	8055.4500
				85	03/06/00	03/31/00	15975.000	25232.5125
				84	02/07/00	03/03/00	7350.000	11609.3250
				83	01/03/00	02/04/00	4800.000	7581.6000
				82	11/29/99	12/31/99	4200.000	6633.9000
				81	11/01/99	11/24/99	8850.000	13978.5750
				80	09/27/99	10/29/99	19350.000	30563.3250
				79	08/30/99	09/24/99	9300.000	14689.3500
				78	08/02/99	08/27/99	8625.000	13623.1875
				77	06/26/99	07/30/99	9675.000	15281.6625
				76	06/01/99	06/25/99	11250.000	17769.3750
				75	05/03/99	05/28/99	12287.500	19408.1063
					TOTAL SINCE	05/03/99:	116762.500	184426.3688
				AVERAGE FOR	05/03/99-	05/05/00:	9730.208	15368.8641
91	DELTA STOCK		0.7537	Current	05/08/00	05/12/00	0.000	0.0000

SORTED BY CLASS CODE, PART NUMBER
FOR A MAXIMUM OF 12 PREVIOUS PERIODS

SS CODE: 170
RM - PULP

T NUMBER	DESCRIPTION	A B C	STANDARD UNIT COST	PERIOD NUMBER	START DATE OF PERIOD	END DATE OF PERIOD	USAGE DURING PERIOD	EXTENDED COST
91	DELTA STOCK		0.7537	86	04/03/00	05/05/00	0.000	0.0000
				85	03/06/00	03/31/00	17814.000	13426.4118
				84	02/07/00	03/03/00	0.000	0.0000
				83	01/03/00	02/04/00	0.000	0.0000
				82	11/29/99	12/31/99	6346.000	4782.9802
				81	11/01/99	11/24/99	0.000	0.0000
				80	09/27/99	10/29/99	9200.000	6934.0400
				79	08/30/99	09/24/99	0.000	0.0000
				78	08/02/99	08/27/99	0.000	0.0000
				77	06/26/99	07/30/99	0.000	0.0000
				76	06/01/99	06/25/99	9356.000	7051.6172
				75	05/03/99	05/28/99	13821.000	10416.8877
					TOTAL SINCE 05/03/99:		56537.000	42611.9369
					AVERAGE FOR 05/03/99-05/05/00:		4711.417	3550.9947
04	ARACRUZ BLEACHEDEUCALYPTUS,STD		162.6300	Current	05/08/00	05/12/00	109.500	17807.9850
				86	04/03/00	05/05/00	586.500	95382.4950
				85	03/06/00	03/31/00	459.750	74769.1425
				84	02/07/00	03/03/00	592.250	96317.6175
				83	01/03/00	02/04/00	708.000	115142.0400
				82	11/29/99	12/31/99	721.500	117337.5450
				81	11/01/99	11/24/99	523.000	85055.4900
				80	09/27/99	10/29/99	1019.250	165760.6275
				79	08/30/99	09/24/99	727.250	118272.6675
				78	08/02/99	08/27/99	430.250	69971.5575
				77	06/26/99	07/30/99	809.750	131689.6425
				76	06/01/99	06/25/99	634.750	103229.3925
				75	05/03/99	05/28/99	376.500	61230.1950
					TOTAL SINCE 05/03/99:		7698.250	1251966.3975
					AVERAGE FOR 05/03/99-05/05/00:		632.396	102846.5344
05	OHIO 20%MIN POST-CONSUMER		191.8118	Current	05/08/00	05/12/00	0.000	0.0000
				86	04/03/00	05/05/00	0.000	0.0000
				85	03/06/00	03/31/00	0.000	0.0000
				84	02/07/00	03/03/00	0.000	0.0000
				83	01/03/00	02/04/00	0.000	0.0000
				82	11/29/99	12/31/99	0.000	0.0000
				81	11/01/99	11/24/99	0.000	0.0000
				80	09/27/99	10/29/99	0.000	0.0000
				79	08/30/99	09/24/99	0.000	0.0000
				78	08/02/99	08/27/99	0.000	0.0000
				77	06/26/99	07/30/99	0.000	0.0000
				76	06/01/99	06/25/99	0.000	0.0000
				75	05/03/99	05/28/99	0.000	0.0000
					TOTAL SINCE 05/03/99:		0.000	0.0000
					AVERAGE FOR 05/03/99-05/05/00:		0.000	0.0000
12	ALABAMA PINE PULP		125.0600	Current	05/08/00	05/12/00	16.000	2000.9600
				86	04/03/00	05/05/00	0.000	0.0000

PART'S PERIOD USAGE REPO...

SORTED BY CLASS CODE, PART NUMBER
FOR A MAXIMUM OF 12 PREVIOUS PERIODS

S CODE: 170
M - PULP

NUMBER	DESCRIPTION	A B C	STANDARD UNIT COST	PERIOD NUMBER	START DATE OF PERIOD	END DATE OF PERIOD	USAGE DURING PERIOD	EXTENDED COST
2	ALABAMA PINE PULP		125.0600	85	03/06/00	03/31/00	0.000	0.0000
				84	02/07/00	03/03/00	0.000	0.0000
				83	01/03/00	02/04/00	0.000	0.0000
				82	11/29/99	12/31/99	0.000	0.0000
				81	11/01/99	11/24/99	0.000	0.0000
				80	09/27/99	10/29/99	0.000	0.0000
				79	08/30/99	09/24/99	0.000	0.0000
				78	08/02/99	08/27/99	0.000	0.0000
				77	06/26/99	07/30/99	0.000	0.0000
				76	06/01/99	06/25/99	17.000	2126.0200
				75	05/03/99	05/28/99	0.000	0.0000
					TOTAL SINCE	05/03/99:	33.000	4126.9800
					AVERAGE FOR	05/03/99-05/05/00:	1.417	177.1683
7	BAHIA SUL PRIME EUCALYPTUS		164.7200	Current	05/08/00	05/12/00	629.750	103732.4200
				86	04/03/00	05/05/00	2095.750	345211.9400
				85	03/06/00	03/31/00	1536.750	253133.4600
				84	02/07/00	03/03/00	1641.250	270346.7000
				83	01/03/00	02/04/00	1965.750	323798.3400
				82	11/29/99	12/31/99	630.750	103897.1400
				81	11/01/99	11/24/99	580.000	95537.6000
				80	09/27/99	10/29/99	736.500	121316.2800
				79	08/30/99	09/24/99	608.750	100273.3000
				78	08/02/99	08/27/99	554.250	91296.0600
				77	06/26/99	07/30/99	1079.750	177856.4200
				76	06/01/99	06/25/99	1167.750	192351.7800
				75	05/03/99	05/28/99	1036.250	170691.1000
					TOTAL SINCE	05/03/99:	14263.250	2349442.5400
					AVERAGE FOR	05/03/99-05/05/00:	1136.125	187142.5100
21	VCP ECF EUCALYPTUS		162.6300	Current	05/08/00	05/12/00	0.000	0.0000
				86	04/03/00	05/05/00	0.000	0.0000
				85	03/06/00	03/31/00	0.000	0.0000
				84	02/07/00	03/03/00	0.000	0.0000
				83	01/03/00	02/04/00	0.000	0.0000
				82	11/29/99	12/31/99	0.000	0.0000
				81	11/01/99	11/24/99	0.000	0.0000
				80	09/27/99	10/29/99	0.000	0.0000
				79	08/30/99	09/24/99	0.000	0.0000
				78	08/02/99	08/27/99	0.000	0.0000
				77	06/26/99	07/30/99	0.000	0.0000
				76	06/01/99	06/25/99	0.000	0.0000
				75	05/03/99	05/28/99	0.000	0.0000
					TOTAL SINCE	05/03/99:	0.000	0.0000
					AVERAGE FOR	05/03/99-05/05/00:	0.000	0.0000
23	PRINCE GEORGE SOFTWOOD		143.0900	Current	05/08/00	05/12/00	62.000	8871.5800
				86	04/03/00	05/05/00	218.000	31193.6200
				85	03/06/00	03/31/00	155.000	22178.9500

PART'S PERIOD USAGE REPORT
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SORTED BY CLASS CODE, PART NUMBER
FOR A MAXIMUM OF 12 PREVIOUS PERIODS

S CODE: 170
M - PULP

NUMBER	DESCRIPTION	A B C	STANDARD UNIT COST	PERIOD NUMBER	START DATE OF PERIOD	END DATE OF PERIOD	USAGE DURING PERIOD	EXTENDED COST
3	PRINCE GEORGE SOFTWOOD		143.0900	84	02/07/00	03/03/00	88.000	12591.9200
				83	01/03/00	02/04/00	0.000	0.0000
					TOTAL SINCE 01/03/00:		523.000	74836.0700
					AVERAGE FOR 01/03/00-05/05/00:		115.250	16491.1225

PART'S PERIOD USAGE REPORT

SORTED BY CLASS CODE, PART NUMBER
FOR A MAXIMUM OF 12 PREVIOUS PERIODS

ASS CODE: 171
RM - DYES

T NUMBER	DESCRIPTION	A B C	STANDARD UNIT COST	PERIOD NUMBER	START DATE OF PERIOD	END DATE OF PERIOD	USAGE DURING PERIOD	EXTENDED COST
01	ERIO YELLOW "T" SUPRA		6.6333	Current	05/08/00	05/12/00	0.000	0.0000
				86	04/03/00	05/05/00	2.400	15.9199
				85	03/06/00	03/31/00	0.000	0.0000
				84	02/07/00	03/03/00	0.000	0.0000
				83	01/03/00	02/04/00	6.600	43.7798
				82	11/29/99	12/31/99	0.000	0.0000
				81	11/01/99	11/24/99	11.000	72.9663
				80	09/27/99	10/29/99	0.000	0.0000
				79	08/30/99	09/24/99	2.000	13.2666
				78	08/02/99	08/27/99	0.000	0.0000
				77	06/26/99	07/30/99	0.600	3.9800
				76	06/01/99	06/25/99	2.400	15.9199
				75	05/03/99	05/28/99	2.000	13.2666
					TOTAL SINCE	05/03/99:	27.000	179.0991
				AVERAGE FOR	05/03/99	-05/05/00:	2.250	14.9249
18	TINOPAL PT LIQUID		1.0400	Current	05/08/00	05/12/00	1507.400	1567.6960
				86	04/03/00	05/05/00	5161.025	5367.4660
				85	03/06/00	03/31/00	4043.775	4205.5260
				84	02/07/00	03/03/00	4341.175	4514.8220
				83	01/03/00	02/04/00	5278.350	5489.4840
				82	11/29/99	12/31/99	2646.900	2752.7760
				81	11/01/99	11/24/99	2273.475	2364.4140
				80	09/27/99	10/29/99	3288.225	3419.7540
				79	08/30/99	09/24/99	2999.075	3119.0380
				78	08/02/99	08/27/99	2083.875	2167.2300
				77	06/26/99	07/30/99	3376.075	3511.1180
				76	06/01/99	06/25/99	3285.475	3416.8940
				75	05/03/99	05/28/99	2277.925	2369.0420
					TOTAL SINCE	05/03/99:	42562.750	44265.2600
				AVERAGE FOR	05/03/99	-05/05/00:	3421.279	3558.1303
21	PONTAMINE KRAFT ORANGE A LIQ.		1.3200	Current	05/08/00	05/12/00	0.000	0.0000
				86	04/03/00	05/05/00	1504.850	1986.4020
				85	03/06/00	03/31/00	1399.100	1846.8120
				84	02/07/00	03/03/00	624.000	823.6800
				83	01/03/00	02/04/00	598.000	789.3600
				82	11/29/99	12/31/99	876.999	1157.6393
				81	11/01/99	11/24/99	654.000	863.2800
				80	09/27/99	10/29/99	890.600	1175.5920
				79	08/30/99	09/24/99	2049.000	2704.6800
				78	08/02/99	08/27/99	0.000	0.0000
				77	06/26/99	07/30/99	1924.000	2539.6800
				76	06/01/99	06/25/99	27.700	36.5640
				75	05/03/99	05/28/99	1614.075	2130.5790
					TOTAL SINCE	05/03/99:	12162.325	16054.2683
				AVERAGE FOR	05/03/99	-05/05/00:	1013.527	1337.8557
22	PONTAMINE YELLOW GXG LIQUID		1.0700	Current	05/08/00	05/12/00	0.000	0.0000

SORTED BY CLASS CODE, PART NUMBER
FOR A MAXIMUM OF 12 PREVIOUS PERIODS

SS CODE: 171
RM - DYES

T NUMBER	DESCRIPTION	A B C	STANDARD UNIT COST	PERIOD NUMBER	START DATE OF PERIOD	END DATE OF PERIOD	USAGE DURING PERIOD	EXTENDED COST
22	PONTAMINE YELLOW GXG LIQUID		1.0700	86	04/03/00	05/05/00	102.400	109.5680
				85	03/06/00	03/31/00	131.000	140.1700
				84	02/07/00	03/03/00	102.400	109.5680
				83	01/03/00	02/04/00	70.000	74.9000
				82	11/29/99	12/31/99	65.000	69.5500
				81	11/01/99	11/24/99	298.825	319.7428
				80	09/27/99	10/29/99	192.000	205.4400
				79	08/30/99	09/24/99	375.000	401.2500
				78	08/02/99	08/27/99	0.000	0.0000
				77	06/26/99	07/30/99	232.000	248.2400
				76	06/01/99	06/25/99	0.800	0.8560
				75	05/03/99	05/28/99	591.200	632.5840
					TOTAL SINCE	05/03/99:	2160.625	2311.8688
				AVERAGE FOR	05/03/99	-05/05/00:	180.052	192.6557
27	PONTAMINE BLACK SP LIQUID		2.5100	Current	05/08/00	05/12/00	0.000	0.0000
				86	04/03/00	05/05/00	3093.750	7765.3125
				85	03/06/00	03/31/00	801.875	2012.7063
				84	02/07/00	03/03/00	133.075	334.0183
				83	01/03/00	02/04/00	489.604	1228.9073
				82	11/29/99	12/31/99	701.000	1759.5087
				81	11/01/99	11/24/99	1071.001	2688.2113
				80	09/27/99	10/29/99	1521.986	3820.1849
				79	08/30/99	09/24/99	3078.667	7727.4542
				78	08/02/99	08/27/99	460.866	1156.7737
				77	06/26/99	07/30/99	2054.434	5156.6293
				76	06/01/99	06/25/99	934.159	2344.7378
				75	05/03/99	05/28/99	2459.975	6174.5373
					TOTAL SINCE	05/03/99:	16800.391	42168.9816
				AVERAGE FOR	05/03/99	-05/05/00:	1400.033	3514.0818
41	INTRABOND LIQUID RED 5BB		1.2700	Current	05/08/00	05/12/00	0.000	0.0000
				86	04/03/00	05/05/00	3186.850	4047.2995
				85	03/06/00	03/31/00	2302.000	2923.5400
				84	02/07/00	03/03/00	1247.250	1584.0075
				83	01/03/00	02/04/00	1402.000	1780.5400
				82	11/29/99	12/31/99	2134.200	2710.4340
				81	11/01/99	11/24/99	898.000	1140.4600
				80	09/27/99	10/29/99	1770.000	2247.9000
				79	08/30/99	09/24/99	3782.000	4803.1400
				78	08/02/99	08/27/99	0.000	0.0000
				77	06/26/99	07/30/99	4419.000	5612.1300
				76	06/01/99	06/25/99	25.500	32.3850
				75	05/03/99	05/28/99	3691.370	4688.0399
					TOTAL SINCE	05/03/99:	24858.170	31569.8759
				AVERAGE FOR	05/03/99	-05/05/00:	2071.514	2630.8230
45	INTRABOND LIQUID BLACK SP		2.0200	Current	05/08/00	05/12/00	0.000	0.0000
				86	04/03/00	05/05/00	0.000	0.0000

SORTED BY CLASS CODE, PART NUMBER
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SS CODE: 171
RM - DYES

T NUMBER	DESCRIPTION	A B C	STANDARD UNIT COST	PERIOD NUMBER	START DATE OF PERIOD	END DATE OF PERIOD	USAGE DURING PERIOD	EXTENDED COST
45	INTRABOND LIQUID BLACK SP		2.0200	85	03/06/00	03/31/00	0.000	0.0000
				84	02/07/00	03/03/00	0.000	0.0000
				83	01/03/00	02/04/00	0.000	0.0000
				82	11/29/99	12/31/99	0.000	0.0000
				81	11/01/99	11/24/99	0.000	0.0000
				80	09/27/99	10/29/99	0.000	0.0000
				79	08/30/99	09/24/99	0.000	0.0000
				78	08/02/99	08/27/99	0.000	0.0000
				77	06/26/99	07/30/99	0.000	0.0000
				76	06/01/99	06/25/99	475.000	959.5000
				75	05/03/99	05/28/99	1200.000	2424.0000
					TOTAL SINCE	05/03/99:	1675.000	3383.5000
					AVERAGE FOR	05/03/99-05/05/00:	139.583	281.9583
48	INTRABOND LIQ. TURQUOISE GLL		2.1000	Current	05/08/00	05/12/00	0.000	0.0000
				86	04/03/00	05/05/00	160.500	337.0500
				85	03/06/00	03/31/00	226.000	474.6000
				84	02/07/00	03/03/00	296.250	622.1250
				83	01/03/00	02/04/00	331.800	696.7800
				82	11/29/99	12/31/99	170.000	357.0000
				81	11/01/99	11/24/99	158.000	331.8000
				80	09/27/99	10/29/99	298.000	625.8000
				79	08/30/99	09/24/99	308.000	646.8000
				78	08/02/99	08/27/99	0.000	0.0000
				77	06/26/99	07/30/99	454.250	953.9250
				76	06/01/99	06/25/99	3.750	7.8750
				75	05/03/99	05/28/99	297.250	624.2250
					TOTAL SINCE	05/03/99:	2703.800	5677.9800
					AVERAGE FOR	05/03/99-05/05/00:	225.317	473.1650
50	PERMABLAK 215 A		0.3100	Current	05/08/00	05/12/00	0.000	0.0000
				86	04/03/00	05/05/00	40873.300	12670.7230
				85	03/06/00	03/31/00	27110.000	8404.1000
				84	02/07/00	03/03/00	24915.000	7723.6500
				83	01/03/00	02/04/00	29224.450	9059.5795
				82	11/29/99	12/31/99	47767.200	14807.8320
				81	11/01/99	11/24/99	28774.000	8919.9400
				80	09/27/99	10/29/99	69329.000	21491.9900
				79	08/30/99	09/24/99	48965.000	15179.1500
				78	08/02/99	08/27/99	5968.000	1850.0800
				77	06/26/99	07/30/99	68842.000	21341.0200
				76	06/01/99	06/25/99	21590.000	6692.9000
				75	05/03/99	05/28/99	42162.500	13070.3750
					TOTAL SINCE	05/03/99:	455520.450	141211.3395
					AVERAGE FOR	05/03/99-05/05/00:	37960.038	11767.6116
51	INTRACID PURE BLUE L PASTE		3.1500	Current	05/08/00	05/12/00	0.000	0.0000
				86	04/03/00	05/05/00	2.232	7.0324
				85	03/06/00	03/31/00	0.000	0.0000

LASS CODE: 171
V RM - DYES

ART NUMBER	DESCRIPTION	A B C	STANDARD UNIT COST	PERIOD NUMBER	START DATE OF PERIOD	END DATE OF PERIOD	USAGE DURING PERIOD	EXTENDED COST
1151	INTRACID PURE BLUE L PASTE		3.1500	84	02/07/00	03/03/00	0.000	0.0000
				83	01/03/00	02/04/00	3.063	9.6494
				82	11/29/99	12/31/99	12.000	37.7994
				81	11/01/99	11/24/99	3.349	10.5487
				80	09/27/99	10/29/99	3.572	11.2521
				79	08/30/99	09/24/99	1.298	4.0887
				78	08/02/99	08/27/99	0.000	0.0000
				77	06/26/99	07/30/99	0.893	2.8130
				76	06/01/99	06/25/99	6.893	21.7123
				75	05/03/99	05/28/99	4.001	12.6016
					TOTAL SINCE 05/03/99:		37.301	117.4976
					AVERAGE FOR 05/03/99-05/05/00:		3.108	9.7915
1157	CARTA VIOLET 3B LIQUID 070		7.6500 Current		05/08/00	05/12/00	0.000	0.0000
				86	04/03/00	05/05/00	58.350	446.3775
				85	03/06/00	03/31/00	110.480	845.1720
				84	02/07/00	03/03/00	144.000	1101.6000
				83	01/03/00	02/04/00	162.000	1239.3000
				82	11/29/99	12/31/99	110.000	841.5000
				81	11/01/99	11/24/99	76.775	587.3288
				80	09/27/99	10/29/99	147.000	1124.5500
				79	08/30/99	09/24/99	148.000	1132.2000
				78	08/02/99	08/27/99	0.000	0.0000
				77	06/26/99	07/30/99	220.800	1689.1200
				76	06/01/99	06/25/99	0.800	6.1200
				75	05/03/99	05/28/99	150.200	1149.0300
					TOTAL SINCE 05/03/99:		1328.405	10162.2983
					AVERAGE FOR 05/03/99-05/05/00:		110.700	846.8582
1158	ARTILENE BLUE 6825-9		7.7112 Current		05/08/00	05/12/00	0.000	0.0000
				86	04/03/00	05/05/00	1.000	7.7112
				85	03/06/00	03/31/00	0.000	0.0000
				84	02/07/00	03/03/00	0.000	0.0000
				83	01/03/00	02/04/00	0.000	0.0000
				82	11/29/99	12/31/99	0.000	0.0000
				81	11/01/99	11/24/99	1.000	7.7112
				80	09/27/99	10/29/99	0.000	0.0000
				79	08/30/99	09/24/99	0.000	0.0000
				78	08/02/99	08/27/99	0.000	0.0000
				77	06/26/99	07/30/99	0.000	0.0000
				76	06/01/99	06/25/99	0.000	0.0000
				75	05/03/99	05/28/99	0.000	0.0000
					TOTAL SINCE 05/03/99:		2.000	15.4224
					AVERAGE FOR 05/03/99-05/05/00:		0.167	1.2852
1160	ANTHOSIN RED 28L LIQUID		2.0040 Current		05/08/00	05/12/00	0.000	0.0000
				86	04/03/00	05/05/00	0.000	0.0000
				85	03/06/00	03/31/00	0.000	0.0000
				84	02/07/00	03/03/00	0.000	0.0000

SORTED BY CLASS CODE, PART NUMBER
FOR A MAXIMUM OF 12 PREVIOUS PERIODS

SS CODE: 171
RM - DYES

T NUMBER	DESCRIPTION	A B C	STANDARD UNIT COST	PERIOD NUMBER	START DATE OF PERIOD	END DATE OF PERIOD	USAGE DURING PERIOD	EXTENDED COST
60	ANTHOSIN RED 28L LIQUID		2.0040	83	01/03/00	02/04/00	0.000	0.0000
				82	11/29/99	12/31/99	0.000	0.0000
				81	11/01/99	11/24/99	0.000	0.0000
				80	09/27/99	10/29/99	0.000	0.0000
				79	08/30/99	09/24/99	0.000	0.0000
				78	08/02/99	08/27/99	0.000	0.0000
				77	06/26/99	07/30/99	0.000	0.0000
				76	06/01/99	06/25/99	0.000	0.0000
				75	05/03/99	05/28/99	0.000	0.0000
					TOTAL SINCE	05/03/99:	0.000	0.0000
				AVERAGE FOR	05/03/99-	05/05/00:	0.000	0.0000
64	BHD 6015 BLUE		6.0500	Current	05/08/00	05/12/00	4.500	27.2232
				86	04/03/00	05/05/00	34.353	207.8338
				85	03/06/00	03/31/00	22.279	134.7861
				84	02/07/00	03/03/00	103.592	626.7304
				83	01/03/00	02/04/00	-48.308	-292.2652
				82	11/29/99	12/31/99	32.765	198.2313
				81	11/01/99	11/24/99	14.680	88.8170
				80	09/27/99	10/29/99	37.387	226.1920
				79	08/30/99	09/24/99	32.923	199.1835
				78	08/02/99	08/27/99	8.076	48.8610
				77	06/26/99	07/30/99	108.724	657.7826
				76	06/01/99	06/25/99	24.947	150.9306
				75	05/03/99	05/28/99	18.514	112.0091
					TOTAL SINCE	05/03/99:	394.432	2386.3154
				AVERAGE FOR	05/03/99-	05/05/00:	32.494	196.5910

SORTED BY CLASS CODE, PART NUMBER
FOR A MAXIMUM OF 12 PREVIOUS PERIODS

ASS CODE: 172
RM - FOURDRINIER

RT NUMBER	DESCRIPTION	A B C	STANDARD UNIT COST	PERIOD NUMBER	START DATE OF PERIOD	END DATE OF PERIOD	USAGE DURING PERIOD	EXTENDED COST
903	#1 KYMENE 557H		0.4120	Current	05/08/00	05/12/00	0.000	0.0000
				86	04/03/00	05/05/00	0.000	0.0000
				85	03/06/00	03/31/00	0.000	0.0000
				84	02/07/00	03/03/00	0.000	0.0000
				83	01/03/00	02/04/00	0.000	0.0000
				82	11/29/99	12/31/99	0.000	0.0000
				81	11/01/99	11/24/99	0.000	0.0000
				80	09/27/99	10/29/99	0.000	0.0000
				79	08/30/99	09/24/99	0.000	0.0000
				78	08/02/99	08/27/99	0.000	0.0000
				77	06/26/99	07/30/99	0.000	0.0000
				76	06/01/99	06/25/99	0.000	0.0000
				75	05/03/99	05/28/99	0.000	0.0000
					TOTAL SINCE	05/03/99:	0.000	0.0000
				AVERAGE FOR	05/03/99-	05/05/00:	0.000	0.0000
959	SODIUM HYDROXIDE		0.1811	Current	05/08/00	05/12/00	0.000	0.0000
				86	04/03/00	05/05/00	3157.000	571.7327
				85	03/06/00	03/31/00	2892.000	523.7412
				84	02/07/00	03/03/00	3067.000	555.4337
				83	01/03/00	02/04/00	2543.000	460.5373
				82	11/29/99	12/31/99	1403.000	254.0833
				81	11/01/99	11/24/99	1666.000	301.7126
				80	09/27/99	10/29/99	2456.000	444.7816
				79	08/30/99	09/24/99	2104.000	381.0344
				78	08/02/99	08/27/99	1228.000	222.3908
				77	06/26/99	07/30/99	3332.000	603.4252
				76	06/01/99	06/25/99	2104.000	381.0344
				75	05/03/99	05/28/99	1052.000	190.5172
					TOTAL SINCE	05/03/99:	27004.000	4890.4244
				AVERAGE FOR	05/03/99-	05/05/00:	2250.333	407.5354
972	AMRES HS30		0.6210	Current	05/08/00	05/12/00	3920.000	2434.3200
				86	04/03/00	05/05/00	19994.500	12416.5845
				85	03/06/00	03/31/00	16006.600	9940.0986
				84	02/07/00	03/03/00	13440.700	8346.6747
				83	01/03/00	02/04/00	18017.600	11188.9296
				82	11/29/99	12/31/99	10648.900	6612.9669
				81	11/01/99	11/24/99	8528.600	5296.2606
				80	09/27/99	10/29/99	12792.800	7944.3288
				79	08/30/99	09/24/99	12044.750	7479.7897
				78	08/02/99	08/27/99	5380.250	3341.1353
				77	06/26/99	07/30/99	14164.550	8796.1856
				76	06/01/99	06/25/99	10007.450	6214.6265
				75	05/03/99	05/28/99	10488.450	6513.3275
					TOTAL SINCE	05/03/99:	155435.150	96525.2283
				AVERAGE FOR	05/03/99-	05/05/00:	12626.263	7840.9090

SORTED BY CLASS CODE, PART NUMBER
FOR A MAXIMUM OF 12 PREVIOUS PERIODS

SS CODE: 173
RM - LATEX

T NUMBER	DESCRIPTION	A B C	STANDARD UNIT COST	PERIOD NUMBER	START DATE OF PERIOD	END DATE OF PERIOD	USAGE DURING PERIOD	EXTENDED COST
04	2671		0.5243	Current	05/08/00	05/12/00	34836.500	18264.7770
				86	04/03/00	05/05/00	151393.000	79375.3499
				85	03/06/00	03/31/00	173668.500	91054.3946
				84	02/07/00	03/03/00	149243.500	78248.3671
				83	01/03/00	02/04/00	155023.000	81278.5589
				82	11/29/99	12/31/99	132143.000	69282.5749
				81	11/01/99	11/24/99	134930.600	70744.1136
				80	09/27/99	10/29/99	261184.400	136938.9809
				79	08/30/99	09/24/99	206943.876	108500.6742
				78	08/02/99	08/27/99	41926.124	21981.8669
				77	06/26/99	07/30/99	193548.000	101477.2164
				76	06/01/99	06/25/99	157590.000	82624.4370
				75	05/03/99	05/28/99	189475.500	99342.0045
					TOTAL SINCE 05/03/99:		**********	1039113.3159
					AVERAGE FOR 05/03/99-05/05/00:		162255.792	85070.7116
42	26138 (XPE-138)		0.5390	Current	05/08/00	05/12/00	6787.500	3658.4625
				86	04/03/00	05/05/00	67301.250	36275.3738
				85	03/06/00	03/31/00	53169.250	28658.2258
				84	02/07/00	03/03/00	37675.000	20306.8250
				83	01/03/00	02/04/00	40068.000	21596.6520
				82	11/29/99	12/31/99	47112.750	25393.7723
				81	11/01/99	11/24/99	39576.250	21331.5988
				80	09/27/99	10/29/99	66100.500	35628.1695
				79	08/30/99	09/24/99	79802.500	43013.5475
				78	08/02/99	08/27/99	34541.500	18617.8685
				77	06/26/99	07/30/99	78676.000	42406.3640
				76	06/01/99	06/25/99	33132.000	17858.1480
				75	05/03/99	05/28/99	50053.000	26978.5670
					TOTAL SINCE 05/03/99:		633995.500	341723.5747
					AVERAGE FOR 05/03/99-05/05/00:		52267.333	28172.0927
50	26796		0.4968	Current	05/08/00	05/12/00	276114.150	137173.5097
				86	04/03/00	05/05/00	**********	515392.5164
				85	03/06/00	03/31/00	749105.550	372155.6372
				84	02/07/00	03/03/00	846293.650	420438.6853
				83	01/03/00	02/04/00	**********	503450.4132
				82	11/29/99	12/31/99	533561.250	265073.2290
				81	11/01/99	11/24/99	446968.950	222054.1744
				80	09/27/99	10/29/99	652604.075	324213.7045
				79	08/30/99	09/24/99	524452.280	260547.8927
				78	08/02/99	08/27/99	363498.875	180586.2411
				77	06/26/99	07/30/99	771670.050	383365.6808
				76	06/01/99	06/25/99	681039.850	338340.5975
				75	05/03/99	05/28/99	588164.900	292200.3223
					TOTAL SINCE 05/03/99:		**********	4214992.6041
					AVERAGE FOR 05/03/99-05/05/00:		684014.207	339818.2579
91	AIRFLEX 323		0.7650	Current	05/08/00	05/12/00	0.000	0.0000

PART'S PERIOD USAGE REPORT
SORTED BY CLASS CODE, PART NUMBER
FOR A MAXIMUM OF 12 PREVIOUS PERIODS

ASS CODE: 173
RM - LATEX

RT NUMBER	DESCRIPTION	A B C	STANDARD UNIT COST	PERIOD NUMBER	START DATE OF PERIOD	END DATE OF PERIOD	USAGE DURING PERIOD	EXTENDED COST
091	AIRFLEX 323		0.7650	86	04/03/00	05/05/00	0.000	0.0000
				85	03/06/00	03/31/00	0.000	0.0000
				84	02/07/00	03/03/00	0.000	0.0000
				83	01/03/00	02/04/00	0.000	0.0000
				82	11/29/99	12/31/99	0.000	0.0000
				81	11/01/99	11/24/99	0.000	0.0000
				80	09/27/99	10/29/99	3583.000	2740.9950
				79	08/30/99	09/24/99	0.000	0.0000
				78	08/02/99	08/27/99	0.000	0.0000
				77	06/26/99	07/30/99	4167.000	3187.7550
				76	06/01/99	06/25/99	0.000	0.0000
				75	05/03/99	05/28/99	0.000	0.0000
					TOTAL SINCE	05/03/99:	7750.000	5928.7500
				AVERAGE FOR	05/03/99-	05/05/00:	645.833	494.0625
094	AIRFLEX 100HS		0.5300 Current		05/08/00	05/12/00	45639.000	24188.6700
				86	04/03/00	05/05/00	138917.000	73626.0100
				85	03/06/00	03/31/00	98293.000	52095.2900
				84	02/07/00	03/03/00	102146.000	54137.3800
				83	01/03/00	02/04/00	150035.000	79518.5500
				82	11/29/99	12/31/99	71596.000	37945.8800
				81	11/01/99	11/24/99	36967.000	19592.5100
				80	09/27/99	10/29/99	73794.000	39110.8200
				79	08/30/99	09/24/99	53802.800	28515.4840
				78	08/02/99	08/27/99	48488.000	25698.6400
				77	06/26/99	07/30/99	58555.000	31034.1500
				76	06/01/99	06/25/99	52413.000	27778.8900
				75	05/03/99	05/28/99	12913.000	6843.8900
					TOTAL SINCE	05/03/99:	943558.800	500086.1640
				AVERAGE FOR	05/03/99-	05/05/00:	74826.650	39658.1245
097	RHOPLEX R-225 (6-4225)		0.9054 Current		05/08/00	05/12/00	0.000	0.0000
				86	04/03/00	05/05/00	1940.000	1756.4760
				85	03/06/00	03/31/00	1900.000	1720.2600
				84	02/07/00	03/03/00	3384.000	3063.8736
				83	01/03/00	02/04/00	2825.000	2557.7550
				82	11/29/99	12/31/99	0.000	0.0000
				81	11/01/99	11/24/99	0.000	0.0000
				80	09/27/99	10/29/99	1900.000	1720.2600
				79	08/30/99	09/24/99	0.000	0.0000
				78	08/02/99	08/27/99	2076.000	1879.6104
				77	06/26/99	07/30/99	0.000	0.0000
				76	06/01/99	06/25/99	0.000	0.0000
				75	05/03/99	05/28/99	0.000	0.0000
					TOTAL SINCE	05/03/99:	14025.000	12698.2350
				AVERAGE FOR	05/03/99-	05/05/00:	1168.750	1058.1863
098	TYLAC 68159-00		0.7338 Current		05/08/00	05/12/00	0.000	0.0000
				86	04/03/00	05/05/00	1840.000	1350.1920

SORTED BY CLASS CODE, PART NUMBER
FOR A MAXIMUM OF 12 PREVIOUS PERIODS

ASS CODE: 173
RM - LATEX

T NUMBER	DESCRIPTION	A B C	STANDARD UNIT COST	PERIOD NUMBER	START DATE OF PERIOD	END DATE OF PERIOD	USAGE DURING PERIOD	EXTENDED COST
98	TYLAC 68159-00		0.7338	85	03/06/00	03/31/00	1840.000	1350.1920
				84	02/07/00	03/03/00	3220.000	2362.8360
				83	01/03/00	02/04/00	1849.000	1356.7962
				82	11/29/99	12/31/99	0.000	0.0000
				81	11/01/99	11/24/99	0.000	0.0000
				80	09/27/99	10/29/99	1840.000	1350.1920
				79	08/30/99	09/24/99	0.000	0.0000
				78	08/02/99	08/27/99	1840.000	1350.1920
				77	06/26/99	07/30/99	0.000	0.0000
				76	06/01/99	06/25/99	0.000	0.0000
				75	05/03/99	05/28/99	0.000	0.0000
					TOTAL SINCE	05/03/99:	12429.000	9120.4002
				AVERAGE FOR	05/03/99-	05/05/00:	1035.750	760.0334
07	2679		0.5544	Current	05/08/00	05/12/00	10870.000	6026.3280
				86	04/03/00	05/05/00	41950.000	23257.0800
				85	03/06/00	03/31/00	60040.000	33286.1760
				84	02/07/00	03/03/00	47396.000	26276.3424
				83	01/03/00	02/04/00	81650.000	45266.7600
				82	11/29/99	12/31/99	39708.000	22014.1152
				81	11/01/99	11/24/99	56300.000	31212.7200
				80	09/27/99	10/29/99	87584.000	48556.5696
				79	08/30/99	09/24/99	86851.000	48150.1944
				78	08/02/99	08/27/99	82999.000	46014.6456
				77	06/26/99	07/30/99	150325.000	83340.1800
				76	06/01/99	06/25/99	131734.000	73033.3296
				75	05/03/99	05/28/99	125378.000	69509.5632
					TOTAL SINCE	05/03/99:	**********	555944.0040
				AVERAGE FOR	05/03/99-	05/05/00:	82659.583	45826.4730
11	CARBOBOND 26387		0.7470	Current	05/08/00	05/12/00	0.000	0.0000
				86	04/03/00	05/05/00	0.000	0.0000
				85	03/06/00	03/31/00	11520.000	8605.4400
				84	02/07/00	03/03/00	0.000	0.0000
				83	01/03/00	02/04/00	0.000	0.0000
				82	11/29/99	12/31/99	8640.000	6454.0800
				81	11/01/99	11/24/99	7680.000	5736.9600
				80	09/27/99	10/29/99	9600.000	7171.2000
				79	08/30/99	09/24/99	0.000	0.0000
				78	08/02/99	08/27/99	0.000	0.0000
				77	06/26/99	07/30/99	7680.000	5736.9600
				76	06/01/99	06/25/99	0.000	0.0000
				75	05/03/99	05/28/99	0.000	0.0000
					TOTAL SINCE	05/03/99:	45120.000	33704.6400
				AVERAGE FOR	05/03/99-	05/05/00:	3760.000	2808.7200

SORTED BY CLASS CODE, PART NUMBER
FOR A MAXIMUM OF 12 PREVIOUS PERIODS

ASS CODE: 174
RM - SATURATING

RT NUMBER	DESCRIPTION	A B C	STANDARD UNIT COST	PERIOD NUMBER	START DATE OF PERIOD	END DATE OF PERIOD	USAGE DURING PERIOD	EXTENDED COST
092	OXALIC ACID		1.5791	Current	05/08/00	05/12/00	0.000	0.0000
				86	04/03/00	05/05/00	22.000	34.7402
				85	03/06/00	03/31/00	9.000	14.2119
				84	02/07/00	03/03/00	26.913	42.4983
				83	01/03/00	02/04/00	164.750	260.1567
				82	11/29/99	12/31/99	24.000	37.8984
				81	11/01/99	11/24/99	32.850	51.8734
				80	09/27/99	10/29/99	30.000	47.3730
				79	08/30/99	09/24/99	55.000	86.8505
				78	08/02/99	08/27/99	3.912	6.1774
				77	06/26/99	07/30/99	28.688	45.3004
				76	06/01/99	06/25/99	22.400	35.3718
				75	05/03/99	05/28/99	21.000	33.1611
					TOTAL SINCE	05/03/99:	440.512	695.6131
				AVERAGE FOR	05/03/99	-05/05/00:	36.709	57.9678
093	UREA		0.1494	Current	05/08/00	05/12/00	9050.000	1352.0700
				86	04/03/00	05/05/00	25987.500	3882.5325
				85	03/06/00	03/31/00	18325.000	2737.7550
				84	02/07/00	03/03/00	21587.500	3225.1725
				83	01/03/00	02/04/00	28250.000	4220.5500
				82	11/29/99	12/31/99	15700.000	2345.5800
				81	11/01/99	11/24/99	12875.000	1923.5250
				80	09/27/99	10/29/99	21637.500	3232.6425
				79	08/30/99	09/24/99	11901.000	1778.0094
				78	08/02/99	08/27/99	9275.000	1385.6850
				77	06/26/99	07/30/99	20537.500	3068.3025
				76	06/01/99	06/25/99	20925.000	3126.1950
				75	05/03/99	05/28/99	19900.000	2973.0600
					TOTAL SINCE	05/03/99:	235951.000	35251.0794
				AVERAGE FOR	05/03/99	-05/05/00:	18908.417	2824.9175
096	ACETIC ACID		0.6549	Current	05/08/00	05/12/00	391.650	256.4916
				86	04/03/00	05/05/00	2573.228	1685.2067
				85	03/06/00	03/31/00	1995.565	1306.8955
				84	02/07/00	03/03/00	1873.809	1227.1578
				83	01/03/00	02/04/00	2171.000	1421.7879
				82	11/29/99	12/31/99	2028.688	1328.5874
				81	11/01/99	11/24/99	1543.859	1011.0733
				80	09/27/99	10/29/99	2756.425	1805.1824
				79	08/30/99	09/24/99	2762.600	1809.2267
				78	08/02/99	08/27/99	848.400	555.6172
				77	06/26/99	07/30/99	3167.215	2074.2091
				76	06/01/99	06/25/99	1710.485	1120.1966
				75	05/03/99	05/28/99	2840.610	1860.3155
					TOTAL SINCE	05/03/99:	26663.533	17461.9477
				AVERAGE FOR	05/03/99	-05/05/00:	2189.324	1433.7880
099	7498 LIQUID		2.8807	Current	05/08/00	05/12/00	7040.000	20280.1280

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T NUMBER	DESCRIPTION	A B C	STANDARD UNIT COST	PERIOD NUMBER	START DATE OF PERIOD	END DATE OF PERIOD	USAGE DURING PERIOD	EXTENDED COST
99	7498 LIQUID		2.8807	86	04/03/00	05/05/00	28456.200	81973.7753
				85	03/06/00	03/31/00	22102.200	63669.8075
				84	02/07/00	03/03/00	23044.500	66384.2912
				83	01/03/00	02/04/00	27721.750	79858.0452
				82	11/29/99	12/31/99	18157.300	52305.7341
				81	11/01/99	11/24/99	15424.900	44434.5094
				80	09/27/99	10/29/99	24562.400	70756.9057
				79	08/30/99	09/24/99	20110.700	57932.8935
				78	08/02/99	08/27/99	9892.750	28498.0449
				77	06/26/99	07/30/99	27493.700	79201.1016
				76	06/01/99	06/25/99	20996.600	60484.9056
				75	05/03/99	05/28/99	22583.450	65056.1444
					TOTAL SINCE	05/03/99:	267586.450	770836.2864
				AVERAGE FOR	05/03/99-	05/05/00:	21712.204	62546.3465
09	DEFOAMER L-474		1.4934 Current		05/08/00	05/12/00	29.657	44.2898
				86	04/03/00	05/05/00	477.850	713.6218
				85	03/06/00	03/31/00	342.333	511.2407
				84	02/07/00	03/03/00	238.454	356.1071
				83	01/03/00	02/04/00	332.975	497.2643
				82	11/29/99	12/31/99	238.513	356.1950
				81	11/01/99	11/24/99	238.650	356.4005
				80	09/27/99	10/29/99	382.850	571.7480
				79	08/30/99	09/24/99	808.960	1208.1015
				78	08/02/99	08/27/99	49.765	74.3189
				77	06/26/99	07/30/99	284.563	424.9658
				76	06/01/99	06/25/99	360.712	538.6873
				75	05/03/99	05/28/99	197.150	294.4241
					TOTAL SINCE	05/03/99:	3982.433	5947.3648
				AVERAGE FOR	05/03/99-	05/05/00:	329.398	491.9229
30	AMERGEL - 100 ANTIFOAM		5.3256 Current		05/08/00	05/12/00	0.000	0.0000
				86	04/03/00	05/05/00	55.000	292.9080
				85	03/06/00	03/31/00	28.000	149.1168
				84	02/07/00	03/03/00	68.000	362.1408
				83	01/03/00	02/04/00	8.000	42.6048
				82	11/29/99	12/31/99	-2.000	-10.6512
				81	11/01/99	11/24/99	50.000	266.2800
				80	09/27/99	10/29/99	5.000	26.6280
				79	08/30/99	09/24/99	12.800	68.1677
				78	08/02/99	08/27/99	7.200	38.3443
				77	06/26/99	07/30/99	18.200	96.9259
				76	06/01/99	06/25/99	-7.000	-37.2792
				75	05/03/99	05/28/99	22.000	117.1632
					TOTAL SINCE	05/03/99:	265.200	1412.3491
				AVERAGE FOR	05/03/99-	05/05/00:	22.100	117.6958
42	8162 EMULSION		0.8973 Current		05/08/00	05/12/00	13264.300	11902.0564
				86	04/03/00	05/05/00	64672.075	58030.2529

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42	8162 EMULSION		0.8973	85	03/06/00	03/31/00	50611.975	45414.1252
				84	02/07/00	03/03/00	49956.250	44825.7431
				83	01/03/00	02/04/00	60656.025	54426.6512
				82	11/29/99	12/31/99	43450.750	38988.3580
				81	11/01/99	11/24/99	36567.100	32811.6588
				80	09/27/99	10/29/99	55883.600	50144.3543
				79	08/30/99	09/24/99	58505.375	52496.8730
				78	08/02/99	08/27/99	22247.300	19962.5023
				77	06/26/99	07/30/99	66490.550	59661.9705
				76	06/01/99	06/25/99	43546.300	39074.0950
				75	05/03/99	05/28/99	49253.325	44195.0085
					TOTAL SINCE	05/03/99:	615104.925	551933.6492
				AVERAGE FOR	05/03/99	-05/05/00:	50153.385	45002.6327
49	CATALYST KR		0.4356	Current	05/08/00	05/12/00	0.000	0.0000
				86	04/03/00	05/05/00	271.200	118.1347
				85	03/06/00	03/31/00	768.400	334.7150
				84	02/07/00	03/03/00	408.000	177.7248
				83	01/03/00	02/04/00	238.300	103.8035
				82	11/29/99	12/31/99	286.700	124.8865
				81	11/01/99	11/24/99	237.300	103.3679
				80	09/27/99	10/29/99	953.000	415.1268
				79	08/30/99	09/24/99	672.000	292.7232
				78	08/02/99	08/27/99	0.000	0.0000
				77	06/26/99	07/30/99	429.400	187.0466
				76	06/01/99	06/25/99	443.300	193.1015
				75	05/03/99	05/28/99	344.000	149.8464
					TOTAL SINCE	05/03/99:	5051.600	2200.4769
				AVERAGE FOR	05/03/99	-05/05/00:	420.967	183.3731
56	ETHOX 3115		1.4126	Current	05/08/00	05/12/00	0.000	0.0000
				86	04/03/00	05/05/00	161.000	227.4286
				85	03/06/00	03/31/00	376.000	531.1376
				84	02/07/00	03/03/00	0.000	0.0000
				83	01/03/00	02/04/00	215.000	303.7090
				82	11/29/99	12/31/99	215.000	303.7090
				81	11/01/99	11/24/99	323.000	456.2698
				80	09/27/99	10/29/99	147.000	207.6522
				79	08/30/99	09/24/99	444.000	627.1944
				78	08/02/99	08/27/99	89.000	125.7214
				77	06/26/99	07/30/99	502.000	709.1252
				76	06/01/99	06/25/99	215.000	303.7090
				75	05/03/99	05/28/99	430.000	607.4180
					TOTAL SINCE	05/03/99:	3117.000	4403.0742
				AVERAGE FOR	05/03/99	-05/05/00:	259.750	366.9229
01	METSOL DT3H		9.7005	Current	05/08/00	05/12/00	29.250	283.7396
				86	04/03/00	05/05/00	89.000	863.3445
				85	03/06/00	03/31/00	73.500	712.9868

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01	METSOL DT3H		9.7005	84	02/07/00	03/03/00	69.250	671.7596
				83	01/03/00	02/04/00	98.250	953.0741
				82	11/29/99	12/31/99	53.750	521.4019
				81	11/01/99	11/24/99	42.000	407.4210
				80	09/27/99	10/29/99	66.500	645.0833
				79	08/30/99	09/24/99	54.750	531.1063
				78	08/02/99	08/27/99	34.250	332.2421
				77	06/26/99	07/30/99	85.750	831.8179
				76	06/01/99	06/25/99	87.750	851.2189
				75	05/03/99	05/28/99	65.500	635.3789
					TOTAL SINCE 05/03/99:		849.500	8240.5749
					AVERAGE FOR 05/03/99-05/05/00:		68.354	663.0696

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01	AQUA AMMONIA		0.2009	Current	05/08/00	05/12/00	388.635	78.0768
				86	04/03/00	05/05/00	1391.113	279.4747
				85	03/06/00	03/31/00	1173.861	235.8287
				84	02/07/00	03/03/00	1153.399	231.7178
				83	01/03/00	02/04/00	1654.790	332.4473
				82	11/29/99	12/31/99	813.133	163.3583
				81	11/01/99	11/24/99	598.652	120.2691
				80	09/27/99	10/29/99	1126.438	226.3014
				79	08/30/99	09/24/99	784.047	157.5151
				78	08/02/99	08/27/99	542.880	109.0647
				77	06/26/99	07/30/99	1286.460	258.4499
				76	06/01/99	06/25/99	983.921	197.6696
				75	05/03/99	05/28/99	877.664	176.3227
					TOTAL SINCE	05/03/99:	12774.992	2566.4961
				AVERAGE FOR	05/03/99-	05/05/00:	1032.196	207.3683
56	PENFORD GUM 280		0.3569	Current	05/08/00	05/12/00	900.000	321.2100
				86	04/03/00	05/05/00	10500.000	3747.4500
				85	03/06/00	03/31/00	8800.000	3140.7200
				84	02/07/00	03/03/00	7950.000	2837.3550
				83	01/03/00	02/04/00	7200.000	2569.6800
				82	11/29/99	12/31/99	11250.000	4015.1250
				81	11/01/99	11/24/99	7450.000	2658.9050
				80	09/27/99	10/29/99	14100.000	5032.2900
				79	08/30/99	09/24/99	13800.000	4925.2200
				78	08/02/99	08/27/99	1200.000	428.2800
				77	06/26/99	07/30/99	14550.000	5192.8950
				76	06/01/99	06/25/99	5600.000	1998.6400
				75	05/03/99	05/28/99	10650.000	3800.9850
					TOTAL SINCE	05/03/99:	113950.000	40668.7550
				AVERAGE FOR	05/03/99-	05/05/00:	9420.833	3362.2954
57	CASCO 07061 STARCH		0.2575	Current	05/08/00	05/12/00	1638.000	421.7850
				86	04/03/00	05/05/00	4349.500	1119.9963
				85	03/06/00	03/31/00	3423.000	881.4225
				84	02/07/00	03/03/00	2818.000	725.6350
				83	01/03/00	02/04/00	231.000	59.4825
				82	11/29/99	12/31/99	0.000	0.0000
				81	11/01/99	11/24/99	0.000	0.0000
				80	09/27/99	10/29/99	0.000	0.0000
					TOTAL SINCE	09/27/99:	12459.500	3208.3213
				AVERAGE FOR	09/27/99-	05/05/00:	1545.929	398.0766
84	ULTRA GLOSS 90		0.1352	Current	05/08/00	05/12/00	35000.000	4732.0000
				86	04/03/00	05/05/00	136620.000	18471.0240
				85	03/06/00	03/31/00	114700.000	15507.4400
				84	02/07/00	03/03/00	134260.000	18151.9520
				83	01/03/00	02/04/00	157650.000	21314.2800
				82	11/29/99	12/31/99	93200.000	12600.6400

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84	ULTRA GLOSS 90		0.1352	81	11/01/99	11/24/99	90100.000	12181.5200
				80	09/27/99	10/29/99	143100.000	19347.1200
				79	08/30/99	09/24/99	125755.189	17002.1016
				78	08/02/99	08/27/99	63744.811	8618.2984
				77	06/26/99	07/30/99	124150.000	16785.0800
				76	06/01/99	06/25/99	112300.000	15182.9599
				75	05/03/99	05/28/99	89922.486	12157.5201
					TOTAL SINCE	05/03/99:	**********	192051.9360
				AVERAGE FOR	05/03/99-	05/05/00:	115458.540	15609.9947
04	FOAMMASTER NXZ		1.5430	Current	05/08/00	05/12/00	24.452	37.7294
				86	04/03/00	05/05/00	579.354	893.9432
				85	03/06/00	03/31/00	421.551	650.4524
				84	02/07/00	03/03/00	488.516	753.7802
				83	01/03/00	02/04/00	367.212	566.6081
				82	11/29/99	12/31/99	431.731	666.1602
				81	11/01/99	11/24/99	430.403	664.1111
				80	09/27/99	10/29/99	653.365	1008.1423
				79	08/30/99	09/24/99	615.565	949.8174
				78	08/02/99	08/27/99	246.758	380.7476
				77	06/26/99	07/30/99	662.577	1022.3566
				76	06/01/99	06/25/99	339.443	523.7604
				75	05/03/99	05/28/99	479.241	739.4682
					TOTAL SINCE	05/03/99:	5740.167	8857.0771
				AVERAGE FOR	05/03/99-	05/05/00:	476.310	734.9456
26	TSPP		0.8026	Current	05/08/00	05/12/00	41.100	32.9869
				86	04/03/00	05/05/00	204.650	164.2521
				85	03/06/00	03/31/00	171.350	137.5255
				84	02/07/00	03/03/00	224.650	180.3041
				83	01/03/00	02/04/00	228.800	183.6349
				82	11/29/99	12/31/99	164.575	132.0879
				81	11/01/99	11/24/99	132.050	105.9833
				80	09/27/99	10/29/99	226.600	181.8689
				79	08/30/99	09/24/99	384.045	308.2346
				78	08/02/99	08/27/99	79.830	64.0713
				77	06/26/99	07/30/99	246.650	197.9610
				76	06/01/99	06/25/99	201.551	161.7645
				75	05/03/99	05/28/99	170.754	137.0468
					TOTAL SINCE	05/03/99:	2476.603	1987.7218
				AVERAGE FOR	05/03/99-	05/05/00:	202.959	162.8946
41	WITCO BALAB 748 DEFOAMER		3.3990	Current	05/08/00	05/12/00	0.000	0.0000
				86	04/03/00	05/05/00	0.000	0.0000
				85	03/06/00	03/31/00	0.000	0.0000
				84	02/07/00	03/03/00	0.000	0.0000
				83	01/03/00	02/04/00	92.400	314.0676
				82	11/29/99	12/31/99	59.800	203.2602
				81	11/01/99	11/24/99	85.150	289.4259

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141	WITCO BALAB 748 DEFOAMER		3.3990	80	09/27/99	10/29/99	99.000	336.5010
				79	08/30/99	09/24/99	89.700	304.8903
				78	08/02/99	08/27/99	104.600	355.5354
				77	06/26/99	07/30/99	92.000	312.7080
				76	06/01/99	06/25/99	121.800	413.9982
				75	05/03/99	05/28/99	69.000	234.5310
					TOTAL SINCE	05/03/99:	813.450	2764.9176
				AVERAGE FOR	05/03/99-	05/05/00:	67.788	230.4098
144	TITINT WHITE R		1.0125	Current	05/08/00	05/12/00	0.000	0.0000
				86	04/03/00	05/05/00	0.000	0.0000
				85	03/06/00	03/31/00	0.000	0.0000
				84	02/07/00	03/03/00	0.000	0.0000
				83	01/03/00	02/04/00	0.000	0.0000
				82	11/29/99	12/31/99	0.000	0.0000
				81	11/01/99	11/24/99	0.000	0.0000
				80	09/27/99	10/29/99	0.000	0.0000
				79	08/30/99	09/24/99	2560.000	2592.0000
				78	08/02/99	08/27/99	1920.000	1944.0000
				77	06/26/99	07/30/99	800.000	810.0000
				76	06/01/99	06/25/99	2308.000	2336.8500
				75	05/03/99	05/28/99	0.000	0.0000
					TOTAL SINCE	05/03/99:	7588.000	7682.8500
				AVERAGE FOR	05/03/99-	05/05/00:	632.333	640.2375
145	RPS VANTAGE TI02		0.7828	Current	05/08/00	05/12/00	8880.000	6951.2640
				86	04/03/00	05/05/00	19677.000	15403.1556
				85	03/06/00	03/31/00	37203.000	29122.5084
				84	02/07/00	03/03/00	25750.000	20157.1000
				83	01/03/00	02/04/00	41887.000	32789.1436
				82	11/29/99	12/31/99	14676.000	11488.3728
				81	11/01/99	11/24/99	32676.000	25578.7728
				80	09/27/99	10/29/99	27450.000	21487.8600
				79	08/30/99	09/24/99	20481.000	16032.5268
				78	08/02/99	08/27/99	41986.000	32866.6408
				77	06/26/99	07/30/99	39449.000	30880.6772
				76	06/01/99	06/25/99	39891.000	31226.6748
				75	05/03/99	05/28/99	39560.000	30967.5680
					TOTAL SINCE	05/03/99:	389566.000	304952.2648
				AVERAGE FOR	05/03/99-	05/05/00:	31723.833	24833.4167
156	TINOPAL CBS-X		17.0609	Current	05/08/00	05/12/00	27.600	470.8808
				86	04/03/00	05/05/00	105.800	1805.0432
				85	03/06/00	03/31/00	93.900	1602.0185
				84	02/07/00	03/03/00	100.050	1706.9430
				83	01/03/00	02/04/00	136.450	2327.9598
				82	11/29/99	12/31/99	57.310	977.7602
				81	11/01/99	11/24/99	60.390	1030.3078
				80	09/27/99	10/29/99	79.060	1348.8348

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56	TINOPAL CBS-X		17.0609	79	08/30/99	09/24/99	82.100	1400.6999
				78	08/02/99	08/27/99	57.050	973.3243
				77	06/26/99	07/30/99	207.600	3541.8428
				76	06/01/99	06/25/99	190.400	3248.3954
				75	05/03/99	05/28/99	177.060	3020.8030
					TOTAL SINCE	05/03/99:	1374.770	23454.8135
					AVERAGE FOR	05/03/99-05/05/00:	112.264	1915.3277
73	POLY-EM 40		1.1803	Current	05/08/00	05/12/00	636.000	750.6708
				86	04/03/00	05/05/00	2297.000	2711.1491
				85	03/06/00	03/31/00	1561.500	1843.0385
				84	02/07/00	03/03/00	1920.500	2266.7662
				83	01/03/00	02/04/00	2378.000	2806.7534
				82	11/29/99	12/31/99	1057.000	1247.5771
				81	11/01/99	11/24/99	651.000	768.3753
				80	09/27/99	10/29/99	1283.000	1514.3249
				79	08/30/99	09/24/99	843.000	994.9929
				78	08/02/99	08/27/99	876.000	1033.9428
				77	06/26/99	07/30/99	980.000	1156.6940
				76	06/01/99	06/25/99	891.000	1051.6473
				75	05/03/99	05/28/99	351.500	414.8755
					TOTAL SINCE	05/03/99:	15725.500	18560.8078
					AVERAGE FOR	05/03/99-05/05/00:	1257.458	1484.1781
75	HTI GLOSCOTE 50		0.6977	Current	05/08/00	05/12/00	310.000	216.2870
				86	04/03/00	05/05/00	842.000	587.4634
				85	03/06/00	03/31/00	621.000	433.2717
				84	02/07/00	03/03/00	540.000	376.7580
				83	01/03/00	02/04/00	967.000	674.6759
				82	11/29/99	12/31/99	499.000	348.1523
				81	11/01/99	11/24/99	195.000	136.0515
				80	09/27/99	10/29/99	485.000	338.3845
				79	08/30/99	09/24/99	295.000	205.8215
				78	08/02/99	08/27/99	341.000	237.9157
				77	06/26/99	07/30/99	600.000	418.6200
				76	06/01/99	06/25/99	560.000	390.7120
				75	05/03/99	05/28/99	313.000	218.3801
					TOTAL SINCE	05/03/99:	6568.000	4582.4936
					AVERAGE FOR	05/03/99-05/05/00:	521.500	363.8506
85	HT CLAY		0.0883	Current	05/08/00	05/12/00	0.000	0.0000
				86	04/03/00	05/05/00	30600.000	2701.9800
				85	03/06/00	03/31/00	24950.000	2203.0850
				84	02/07/00	03/03/00	21150.000	1867.5450
				83	01/03/00	02/04/00	65900.000	5818.9700
				82	11/29/99	12/31/99	35650.000	3147.8950
				81	11/01/99	11/24/99	20600.000	1818.9800
				80	09/27/99	10/29/99	43500.000	3841.0500
				79	08/30/99	09/24/99	47550.000	4198.6650

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185	HT CLAY		0.0883	78	08/02/99	08/27/99	3600.000	317.8800
				77	06/26/99	07/30/99	58400.000	5156.7200
				76	06/01/99	06/25/99	19250.000	1699.7750
				75	05/03/99	05/28/99	40850.000	3607.0550
					TOTAL SINCE 05/03/99:		412000.000	36379.6000
					AVERAGE FOR 05/03/99-05/05/00:		34333.333	3031.6333
187	ULTRA WHITE 90		0.1270	Current	05/08/00	05/12/00	52700.000	6692.9000
				86	04/03/00	05/05/00	158450.000	20123.1500
				85	03/06/00	03/31/00	106325.000	13503.2750
				84	02/07/00	03/03/00	126575.000	16075.0250
				83	01/03/00	02/04/00	143800.000	18262.6000
				82	11/29/99	12/31/99	71800.000	9118.6000
				81	11/01/99	11/24/99	55125.000	7000.8750
				80	09/27/99	10/29/99	88500.000	11239.5000
				79	08/30/99	09/24/99	87975.000	11172.8250
				78	08/02/99	08/27/99	53150.000	6750.0500
				77	06/26/99	07/30/99	97750.000	12414.2500
				76	06/01/99	06/25/99	88050.000	11182.3500
				75	05/03/99	05/28/99	54725.000	6950.0750
					TOTAL SINCE 05/03/99:		**********	150485.4750
					AVERAGE FOR 05/03/99-05/05/00:		94352.083	11982.7146
189	ANSILEX 93		0.2444	Current	05/08/00	05/12/00	21600.000	5279.0400
				86	04/03/00	05/05/00	65050.000	15898.2200
				85	03/06/00	03/31/00	51700.000	12635.4800
				84	02/07/00	03/03/00	54150.000	13234.2600
				83	01/03/00	02/04/00	74650.000	18244.4600
				82	11/29/99	12/31/99	34350.000	8395.1400
				81	11/01/99	11/24/99	23900.000	5841.1600
				80	09/27/99	10/29/99	37250.000	9103.9000
				79	08/30/99	09/24/99	28850.000	7050.9400
				78	08/02/99	08/27/99	27800.000	6794.3200
				77	06/26/99	07/30/99	38850.000	9494.9400
				76	06/01/99	06/25/99	39800.000	9727.1200
				75	05/03/99	05/28/99	20400.000	4985.7600
					TOTAL SINCE 05/03/99:		518350.000	126684.7400
					AVERAGE FOR 05/03/99-05/05/00:		41395.833	10117.1417
192	ROPAQUE HP-1055		0.4912	Current	05/08/00	05/12/00	6648.000	3265.4976
				86	04/03/00	05/05/00	24618.000	12092.3616
				85	03/06/00	03/31/00	20854.000	10243.4848
				84	02/07/00	03/03/00	25820.000	12682.7840
				83	01/03/00	02/04/00	29870.000	14672.1440
				82	11/29/99	12/31/99	14095.000	6923.4640
				81	11/01/99	11/24/99	12554.000	6166.5248
				80	09/27/99	10/29/99	15814.000	7767.8368
				79	08/30/99	09/24/99	14182.000	6966.1984
				78	08/02/99	08/27/99	14004.000	6878.7648

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7192	ROPAQUE HP-1055		0.4912	77	06/26/99	07/30/99	25604.000	12576.6848
				76	06/01/99	06/25/99	26976.000	13250.6112
				75	05/03/99	05/28/99	21260.000	10442.9120
					TOTAL SINCE	05/03/99:	252299.000	123929.2688
					AVERAGE FOR	05/03/99-05/05/00:	20470.917	10055.3143
7194	FOAMASTER VF		1.3236	Current	05/08/00	05/12/00	195.950	259.3594
				86	04/03/00	05/05/00	565.051	747.9008
				85	03/06/00	03/31/00	433.149	573.3161
				84	02/07/00	03/03/00	406.700	538.3083
				83	01/03/00	02/04/00	640.799	848.1609
				82	11/29/99	12/31/99	245.707	325.2175
				81	11/01/99	11/24/99	191.800	253.8669
				80	09/27/99	10/29/99	343.850	455.1200
				79	08/30/99	09/24/99	285.400	377.7554
				78	08/02/99	08/27/99	190.900	252.6752
				77	06/26/99	07/30/99	244.445	323.5481
				76	06/01/99	06/25/99	204.705	270.9470
				75	05/03/99	05/28/99	97.150	128.5872
					TOTAL SINCE	05/03/99:	4045.605	5354.7628
					AVERAGE FOR	05/03/99-05/05/00:	320.805	424.6170
7197	CALGON T / RHEOTECC T		2.0621	Current	05/08/00	05/12/00	41.400	85.3709
				86	04/03/00	05/05/00	105.000	216.5205
				85	03/06/00	03/31/00	82.950	171.0512
				84	02/07/00	03/03/00	139.350	287.3536
				83	01/03/00	02/04/00	93.600	193.0126
				82	11/29/99	12/31/99	40.500	83.5151
				81	11/01/99	11/24/99	24.400	50.3152
				80	09/27/99	10/29/99	86.800	178.9903
				79	08/30/99	09/24/99	38.800	80.0095
				78	08/02/99	08/27/99	28.800	59.3885
				77	06/26/99	07/30/99	37.800	77.9474
				76	06/01/99	06/25/99	33.450	68.9772
				75	05/03/99	05/28/99	56.750	117.0242
					TOTAL SINCE	05/03/99:	809.600	1669.4762
					AVERAGE FOR	05/03/99-05/05/00:	64.017	132.0088
7201	DISPEX N40		0.5717	Current	05/08/00	05/12/00	31.500	18.0086
				86	04/03/00	05/05/00	197.500	112.9108
				85	03/06/00	03/31/00	145.300	83.0680
				84	02/07/00	03/03/00	101.200	57.8560
				83	01/03/00	02/04/00	148.200	84.7259
				82	11/29/99	12/31/99	131.400	75.1214
				81	11/01/99	11/24/99	79.400	45.3930
				80	09/27/99	10/29/99	125.800	71.9199
				79	08/30/99	09/24/99	187.500	107.1938
				78	08/02/99	08/27/99	80.900	46.2505
				77	06/26/99	07/30/99	297.800	170.2523

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201	DISPEX N40		0.5717	76	06/01/99	06/25/99	84.000	48.0228
				75	05/03/99	05/28/99	260.600	148.9850
					TOTAL SINCE	05/03/99:	1871.100	1069.7080
					AVERAGE FOR	05/03/99-05/05/00:	153.300	87.6416
203	TAMOL 850		1.0897	Current	05/08/00	05/12/00	26.200	28.5501
				86	04/03/00	05/05/00	88.400	96.3295
				85	03/06/00	03/31/00	207.600	226.2217
				84	02/07/00	03/03/00	213.800	232.9779
				83	01/03/00	02/04/00	373.200	406.6760
				82	11/29/99	12/31/99	82.600	90.0092
				81	11/01/99	11/24/99	111.000	120.9567
				80	09/27/99	10/29/99	111.700	121.7195
				79	08/30/99	09/24/99	197.500	215.2158
				78	08/02/99	08/27/99	291.600	317.7565
				77	06/26/99	07/30/99	435.000	474.0195
				76	06/01/99	06/25/99	376.000	409.7272
				75	05/03/99	05/28/99	349.000	380.3053
					TOTAL SINCE	05/03/99:	2863.600	3120.4649
					AVERAGE FOR	05/03/99-05/05/00:	236.450	257.6596
204	SYLOID W 500		1.6083	Current	05/08/00	05/12/00	396.000	636.8868
				86	04/03/00	05/05/00	2046.000	3290.5818
				85	03/06/00	03/31/00	4004.000	6439.6332
				84	02/07/00	03/03/00	4840.000	7784.1720
				83	01/03/00	02/04/00	4576.000	7359.5808
				82	11/29/99	12/31/99	2288.000	3679.7904
				81	11/01/99	11/24/99	3256.000	5236.6248
				80	09/27/99	10/29/99	3080.000	4953.5640
				79	08/30/99	09/24/99	3564.000	5731.9812
				78	08/02/99	08/27/99	3344.000	5378.1552
				77	06/26/99	07/30/99	3256.000	5236.6248
				76	06/01/99	06/25/99	3344.000	5378.1552
				75	05/03/99	05/28/99	2640.000	4245.9120
					TOTAL SINCE	05/03/99:	40634.000	65351.6622
					AVERAGE FOR	05/03/99-05/05/00:	3353.167	5392.8980
206	WITCO BALAB 3056A DEFOAMER		1.2508	Current	05/08/00	05/12/00	0.000	0.0000
				86	04/03/00	05/05/00	0.000	0.0000
				85	03/06/00	03/31/00	0.000	0.0000
				84	02/07/00	03/03/00	43.200	54.0346
				83	01/03/00	02/04/00	150.400	188.1203
				82	11/29/99	12/31/99	107.400	134.3359
				81	11/01/99	11/24/99	136.900	171.2345
				80	09/27/99	10/29/99	141.000	176.3628
				79	08/30/99	09/24/99	144.300	180.4904
				78	08/02/99	08/27/99	205.400	256.9143
				77	06/26/99	07/30/99	156.000	195.1248
				76	06/01/99	06/25/99	159.200	199.1274

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206	WITCO BALAB 3056A DEFOAMER		1.2508	75	05/03/99	05/28/99	134.600	168.3577
					TOTAL SINCE	05/03/99:	1378.400	1724.1027
					AVERAGE FOR	05/03/99-05/05/00:	114.867	143.6752
207	TACKIDEX 332F		0.7001	Current	05/08/00	05/12/00	0.000	0.0000
				86	04/03/00	05/05/00	0.000	0.0000
				85	03/06/00	03/31/00	0.000	0.0000
				84	02/07/00	03/03/00	186.000	130.2186
				83	01/03/00	02/04/00	7142.750	5000.6393
				82	11/29/99	12/31/99	4220.500	2954.7721
				81	11/01/99	11/24/99	1442.750	1010.0693
				80	09/27/99	10/29/99	3017.000	2112.2017
				79	08/30/99	09/24/99	2924.500	2047.4425
				78	08/02/99	08/27/99	1816.500	1271.7317
				77	06/26/99	07/30/99	3273.000	2291.4273
				76	06/01/99	06/25/99	2852.750	1997.2103
				75	05/03/99	05/28/99	1856.250	1299.5606
					TOTAL SINCE	05/03/99:	28732.000	20115.2734
					AVERAGE FOR	05/03/99-05/05/00:	2394.333	1676.2728
208	BERCHEM 4762 THICKENER		2.4181	Current	05/08/00	05/12/00	0.000	0.0000
				86	04/03/00	05/05/00	0.000	0.0000
				85	03/06/00	03/31/00	0.000	0.0000
				84	02/07/00	03/03/00	0.000	0.0000
				83	01/03/00	02/04/00	0.000	0.0000
				82	11/29/99	12/31/99	0.000	0.0000
				81	11/01/99	11/24/99	0.000	0.0000
				80	09/27/99	10/29/99	358.000	865.6798
				79	08/30/99	09/24/99	496.000	1199.3776
				78	08/02/99	08/27/99	152.000	367.5512
				77	06/26/99	07/30/99	243.500	588.8074
				76	06/01/99	06/25/99	227.500	550.1178
				75	05/03/99	05/28/99	162.500	392.9413
					TOTAL SINCE	05/03/99:	1639.500	3964.4751
					AVERAGE FOR	05/03/99-05/05/00:	136.625	330.3729
209	ALBACAR 5970		0.2227	Current	05/08/00	05/12/00	2000.000	445.4000
				86	04/03/00	05/05/00	1100.000	244.9700
				85	03/06/00	03/31/00	5500.000	1224.8500
				84	02/07/00	03/03/00	0.000	0.0000
				83	01/03/00	02/04/00	6500.000	1447.5500
				82	11/29/99	12/31/99	1800.000	400.8600
				81	11/01/99	11/24/99	2500.000	556.7500
				80	09/27/99	10/29/99	3200.000	712.6400
				79	08/30/99	09/24/99	2400.000	534.4800
				78	08/02/99	08/27/99	2700.000	601.2900
				77	06/26/99	07/30/99	34150.000	7605.2050
				76	06/01/99	06/25/99	33300.000	7415.9100
				75	05/03/99	05/28/99	32350.000	7204.3450

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						TOTAL SINCE 05/03/99:	127500.000	28394.2500
						AVERAGE FOR 05/03/99-05/05/00:	10458.333	2329.0708
211	SYLOID W 300		1.6083	Current	05/08/00	05/12/00	132.000	212.2956
				86	04/03/00	05/05/00	704.000	1132.2432
				85	03/06/00	03/31/00	132.000	212.2956
				84	02/07/00	03/03/00	0.000	0.0000
				83	01/03/00	02/04/00	0.000	0.0000
				82	11/29/99	12/31/99	132.000	212.2956
				81	11/01/99	11/24/99	0.000	0.0000
				80	09/27/99	10/29/99	396.000	636.8868
				79	08/30/99	09/24/99	132.000	212.2956
				78	08/02/99	08/27/99	660.000	1061.4780
				77	06/26/99	07/30/99	7700.000	12383.9100
				76	06/01/99	06/25/99	8140.000	13091.5620
				75	05/03/99	05/28/99	8712.000	14011.5096
						TOTAL SINCE 05/03/99:	26840.000	43166.7720
						AVERAGE FOR 05/03/99-05/05/00:	2225.667	3579.5397
212	SYLOID 620		2.7817	Current	05/08/00	05/12/00	0.000	0.0000
				86	04/03/00	05/05/00	250.000	695.4250
				85	03/06/00	03/31/00	150.000	417.2550
				84	02/07/00	03/03/00	250.000	695.4250
				83	01/03/00	02/04/00	400.000	1112.6800
				82	11/29/99	12/31/99	0.000	0.0000
				81	11/01/99	11/24/99	650.000	1808.1050
				80	09/27/99	10/29/99	675.000	1877.6475
				79	08/30/99	09/24/99	50.000	139.0850
				78	08/02/99	08/27/99	200.000	556.3400
				77	06/26/99	07/30/99	75.000	208.6275
				76	06/01/99	06/25/99	125.000	347.7125
				75	05/03/99	05/28/99	1200.000	3338.0400
						TOTAL SINCE 05/03/99:	4025.000	11196.3425
						AVERAGE FOR 05/03/99-05/05/00:	335.417	933.0285
214	MIRACLIPSE PG		0.1968	Current	05/08/00	05/12/00	0.000	0.0000
				86	04/03/00	05/05/00	0.000	0.0000
				85	03/06/00	03/31/00	0.000	0.0000
				84	02/07/00	03/03/00	0.000	0.0000
				83	01/03/00	02/04/00	0.000	0.0000
				82	11/29/99	12/31/99	138.000	27.1584
				81	11/01/99	11/24/99	0.000	0.0000
				80	09/27/99	10/29/99	500.000	98.4000
				79	08/30/99	09/24/99	100.000	19.6800
				78	08/02/99	08/27/99	0.000	0.0000
				77	06/26/99	07/30/99	420.000	82.6560
				76	06/01/99	06/25/99	276.000	54.3168
				75	05/03/99	05/28/99	0.000	0.0000
						TOTAL SINCE 05/03/99:	1434.000	282.2112
						AVERAGE FOR 05/03/99-05/05/00:	119.500	23.5176
221	MAGRABAR DEFOAMER PD-218		1.0234	Current	05/08/00	05/12/00	92.000	94.1528

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CLASS CODE: 177
BV RM - COATING

PART NUMBER	DESCRIPTION	A B C	STANDARD UNIT COST	PERIOD NUMBER	START DATE OF PERIOD	END DATE OF PERIOD	USAGE DURING PERIOD	EXTENDED COST
77221	MAGRABAR DEFOAMER PD-218		1.0234	86	04/03/00	05/05/00	438.250	448.5051
				85	03/06/00	03/31/00	629.250	643.9745
				84	02/07/00	03/03/00	621.000	635.5314
				83	01/03/00	02/04/00	404.000	413.4536
				82	11/29/99	12/31/99	54.000	55.2636
				81	11/01/99	11/24/99	74.000	75.7316
				80	09/27/99	10/29/99	154.000	157.6036
				79	08/30/99	09/24/99	13.000	13.3042
				78	08/02/99	08/27/99	124.000	126.9016
				77	06/26/99	07/30/99	811.000	829.9774
				76	06/01/99	06/25/99	813.000	832.0242
				75	05/03/99	05/28/99	845.000	864.7730
					TOTAL SINCE 05/03/99:		5072.500	5191.1966
					AVERAGE FOR 05/03/99-05/05/00:		415.042	424.7537
77222	BERCHEM 4765 THICKENER		2.4790	Current	05/08/00	05/12/00	0.000	0.0000
				86	04/03/00	05/05/00	0.000	0.0000
				85	03/06/00	03/31/00	0.000	0.0000
				84	02/07/00	03/03/00	0.000	0.0000
				83	01/03/00	02/04/00	0.000	0.0000
				82	11/29/99	12/31/99	0.000	0.0000
				81	11/01/99	11/24/99	0.000	0.0000
				80	09/27/99	10/29/99	0.000	0.0000
					TOTAL SINCE 09/27/99:		0.000	0.0000
					AVERAGE FOR 09/27/99-05/05/00:		0.000	0.0000
77223	DOW METHOCEL K15M		6.3048	Current	05/08/00	05/12/00	0.000	0.0000
				86	04/03/00	05/05/00	0.000	0.0000
				85	03/06/00	03/31/00	0.000	0.0000
				84	02/07/00	03/03/00	134.500	847.9956
				83	01/03/00	02/04/00	445.500	2808.7884
				82	11/29/99	12/31/99	287.000	1809.4776
				81	11/01/99	11/24/99	33.000	208.0584
					TOTAL SINCE 11/01/99:		900.000	5674.3200
					AVERAGE FOR 11/01/99-05/05/00:		150.000	945.7200
77224	HYDRAD C (HYDRATED ALUMINA)		0.2164	Current	05/08/00	05/12/00	0.000	0.0000
				86	04/03/00	05/05/00	0.000	0.0000
				85	03/06/00	03/31/00	0.000	0.0000
				84	02/07/00	03/03/00	0.000	0.0000
				83	01/03/00	02/04/00	0.000	0.0000
				82	11/29/99	12/31/99	0.000	0.0000
					TOTAL SINCE 11/29/99:		0.000	0.0000
					AVERAGE FOR 11/29/99-05/05/00:		0.000	0.0000
7225	CIBA VISCALEX AT66 THICKENER		2.5410	Current	05/08/00	05/12/00	412.500	1048.1625
				86	04/03/00	05/05/00	1252.500	3182.6025
				85	03/06/00	03/31/00	1057.250	2686.4723

SORTED BY CLASS CODE, PART NUMBER
FOR A MAXIMUM OF 12 PREVIOUS PERIODS

CLASS CODE: 177
BV RM - COATING

PART NUMBER	DESCRIPTION	A B C	STANDARD UNIT COST	PERIOD NUMBER	START DATE OF PERIOD	END DATE OF PERIOD	USAGE DURING PERIOD	EXTENDED COST
77225	CIBA VISCALEX AT66 THICKENER		2.5410	84	02/07/00	03/03/00	864.000	2195.4240
				83	01/03/00	02/04/00	207.000	525.9870
					TOTAL SINCE	01/03/00:	3793.250	9638.6483
					AVERAGE FOR	01/03/00-05/05/00:	845.188	2147.6215
77928	CALCIUM CARBONATE H-90 DRY		0.1444	Current	05/08/00	05/12/00	0.000	0.0000
				86	04/03/00	05/05/00	0.000	0.0000
				85	03/06/00	03/31/00	0.000	0.0000
				84	02/07/00	03/03/00	0.000	0.0000
				83	01/03/00	02/04/00	0.000	0.0000
				82	11/29/99	12/31/99	0.000	0.0000
				81	11/01/99	11/24/99	0.000	0.0000
				80	09/27/99	10/29/99	0.000	0.0000
				79	08/30/99	09/24/99	0.000	0.0000
				78	08/02/99	08/27/99	0.000	0.0000
				77	06/26/99	07/30/99	0.000	0.0000
				76	06/01/99	06/25/99	0.000	0.0000
					TOTAL SINCE	06/01/99:	0.000	0.0000
					AVERAGE FOR	06/01/99-05/05/00:	0.000	0.0000
77929	CALCIUM CARBONATE H-90		0.1689	Current	05/08/00	05/12/00	0.000	0.0000
				86	04/03/00	05/05/00	0.000	0.0000
				85	03/06/00	03/31/00	0.000	0.0000
				84	02/07/00	03/03/00	0.000	0.0000
				83	01/03/00	02/04/00	0.000	0.0000
				82	11/29/99	12/31/99	0.000	0.0000
				81	11/01/99	11/24/99	0.000	0.0000
				80	09/27/99	10/29/99	0.000	0.0000
				79	08/30/99	09/24/99	0.000	0.0000
				78	08/02/99	08/27/99	0.000	0.0000
				77	06/26/99	07/30/99	2750.000	464.4750
				76	06/01/99	06/25/99	0.000	0.0000
				75	05/03/99	05/28/99	0.000	0.0000
					TOTAL SINCE	05/03/99:	2750.000	464.4750
					AVERAGE FOR	05/03/99-05/05/00:	229.167	38.7063
77930	CALCIUM CARBONATE COVERCARB		0.0770	Current	05/08/00	05/12/00	72525.000	5584.4250
				86	04/03/00	05/05/00	214942.000	16550.5340
				85	03/06/00	03/31/00	147976.000	11394.1520
				84	02/07/00	03/03/00	133221.500	10258.0555
				83	01/03/00	02/04/00	210717.000	16225.2090
				82	11/29/99	12/31/99	98257.500	7565.8275
				81	11/01/99	11/24/99	53585.000	4126.0450
				80	09/27/99	10/29/99	123936.500	9543.1105
				79	08/30/99	09/24/99	65671.000	5056.6670
				78	08/02/99	08/27/99	68332.000	5261.5640
				77	06/26/99	07/30/99	123417.000	9503.1090
				76	06/01/99	06/25/99	116588.500	8977.3145
				75	05/03/99	05/28/99	60789.000	4680.7530

PART'S PERIOD USAGE RE..T
SORTED BY CLASS CODE, PART NUMBER
FOR A MAXIMUM OF 12 PREVIOUS PERIODS

ASS CODE: 177
RM - COATING

RT NUMBER	DESCRIPTION	A B C	STANDARD UNIT COST	PERIOD NUMBER	START DATE OF PERIOD	END DATE OF PERIOD	USAGE DURING PERIOD	EXTENDED COST
						TOTAL SINCE 05/03/99:	**********	114726.7660
						AVERAGE FOR 05/03/99-05/05/00:	118119.417	9095.1951

**********END OF REPORT**********

APPENDIX 34

1998/99 SARA Title III Tier II Submissions

REXAM

REXAM DSI
BRIDGE STREET
BROWNVILLE NY 13615
USA
FAX 1 315 782 5416
TELEPHONE
1 315 782 5800

29 Feb 00

Thomas C. Bowman
LEPC Jefferson County
County Administration Building
175 Arsenal Street
Watertown, NY 13601

Dear Mr. Bowman,

Enclosed is a copy of the Tier Two Emergency and Hazardous Chemical Information for:

Rexam DSI
Bridge Street
Brownville, NY 13615

Formerly Decorative Specialties International.

Feel free to contact me with any questions or comments.

Sincerely,

Steven M. Lange
Senior Process Engineer
Rexam - DSI Brownville, NY

cc: Norman K. Tomlinson - Rexam
Community Right to Know Emergency Coordinator - Brownville Fire Department
NYSDEC Bureau of Spill Responses

Revised June 1990 — 44° 0' N. Latitude 75° 58' W. Longitude — Form Approved OMB No. 2050-0072

Tier Two
EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Specific Information by Chemical

Facility Identification
Name: REXAM - DSI
Street: Bridge St.
City: Brownville Co.: Jefferson State: NY Zip: 13615
SIC Code: 2621 Dun/Brad Number: 62 339 3030

FOR OFFICIAL USE ONLY — ID# — Date Received

Owner/Operator Name
Name: REXAM - DSI Phone: 315-782-5800
Mail Addr.:

Emergency Contact
Name: Steven M Lange Title: Senior Process Engineer
Phone: 315-782-5800 24 Hr Phone: Same
Name: Arthur H. Hilts Title: Production Manager
Phone: 315-782-5800 24 Hr Phone: Same

Important: Read all instructions before completing form

Reporting Period: From January 1 to December 31, 1999

☑ Check if the information below is identical to the information submitted last year

Chemical Description	Physical and Health Hazards (check all that apply)	Inventory	Container Type / Temp / Pressure — Storage Codes and Locations (Non-Confidential) — Storage Locations	Optional
CAS 68476335 Trade Secret ☐ Chem. Name: #6 Fuel Oil Check all that apply: ☒ Pure ☐ Mix ☐ Solid ☐ Liquid ☐ Gas ☐ EHS EHS Name:	☒ Fire ☐ Sudden release of pressure ☐ Reactivity ☐ Intermediate ☐ (acute) Delayed	05 Max Daily Amount (code) 05 Avg Daily Amount (code) 365 No. of Days On-site (code)	C4 1 Location 8	☑
CAS 50000 Trade Secret ☐ Chem. Name: Formaldehyde Check all that apply: ☐ Pure ☒ Mix ☐ Solid ☐ Liquid ☐ Gas ☒ EHS EHS Name:	☐ Fire ☐ Sudden release of pressure ☐ Reactivity ☒ Intermediate ☒ (acute) Delayed	02 Max Daily Amount (code) 02 Avg Daily Amount (code) 365 No. of Days On-site (code)	C4 1 I4 1 Location 7 Location 3,4,6 Found in Residual Amounts in Latex Emulsions	☐
CAS 107131 Trade Secret ☐ Chem. Name: Check all that apply: ☐ Pure ☒ Mix ☐ Solid ☐ Liquid ☐ Gas ☒ EHS EHS Name: Acrylonitrile	☐ Fire ☐ Sudden release of pressure ☐ Reactivity ☒ Intermediate ☐ (acute) Delayed	01 Max Daily Amount (code) 01 Avg Daily Amount (code) 365 No. of Days On-site (code)	C4 1 I4 1 Location 8 Location 3,4,6 Found in Residual Amounts in Latex Emulsions	☐

Certification *(Read and sign after completing all sections)*

I certify under penalty of law that I have personally examined and am familiar with the information in pages one through 3, and that based on my inquiry of those individuals responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

1 Steven M Lange Senior Process Engineer Steven M Lange 29 Feb 00

Name and title of owner/operator or owner/operator's authorized representative — Signature — Date

☑ I have attached a site plan
☐ I have attached a list of site coordinate abbreviations
☐ I have attached a description of dikes and other safeguard measures

N. Latitude 75° 58' W. Longitude

Page 1 of 2 pages
Form Approved OMB No. 2050-0072

Tier Two
EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Specific Information by Chemical

Facility Identification
Name: REXAM - DSI
Street: Bridge St.
City: Brownville Co.: Jefferson State: NY Zip: 13615
SIC Code: 2621 Dun/Brad Number: 62 335 3030

FOR OFFICIAL USE ONLY
ID#
Date Received

Owner/Operator Name
Name: REXAM - DSI Phone: 315-782-5800
Mail Addr.

Emergency Contact
Name: Steven M Lange Title: Senior Process Engineer
Phone: 315-782-5800 24 Hr Phone: Same
Name: Arthur H. Hilts Title: Production Manager
Phone: 315-782-5800 24 Hr Phone: Same

Important: Read all instructions before completing form

Reporting Period: From January 1 to December 31, 1999

☑ Check if the information below is identical to the information submitted last year

Chemical Description	Physical and Health Hazards (check all that apply)	Inventory	Container Type / Temp / Pressure	Storage Codes and Locations (Non-Confidential) — Storage Locations	Optional
CAS 7664417 ☐ Trade Secret Chem. Name: Ammonia 30% Check all that apply: ☐ Pure ☒ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS EHS Name:	☐ Fire ☐ Sudden release of pressure ☐ Reactivity ☒ Intermediate ☐ (acute) Delayed	03 Max Daily Amount (code) 03 Avg Daily Amount (code) 365 No. of Days On-site (code)	041	Location 8 30% Ammonium Hydroxide	☑
CAS 107211 ☐ Trade Secret Chem. Name: Ethylene Glycol Check all that apply: ☐ Pure ☒ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS EHS Name:	☐ Fire ☐ Sudden release of pressure ☐ Reactivity ☒ Intermediate ☐ (acute) Delayed	03 Max Daily Amount (code) 03 Avg Daily Amount (code) 365 No. of Days On-site (code)	052	Location 5	☑
CAS 57136 ☐ Trade Secret Chem. Name: Urea Check all that apply: ☐ Pure ☐ Mix ☒ Solid ☐ Liquid ☐ Gas ☐ EHS EHS Name:	☐ Fire ☐ Sudden release of pressure ☐ Reactivity ☒ Intermediate ☐ (acute) Delayed	03 Max Daily Amount (code) 03 Avg Daily Amount (code) 365 No. of Days On-site (code)	041	Location 6, 3	☑

Certification *(Read and sign after completing all sections)*

I certify under penalty of law that I have personally examined and am familiar with the information in pages one through 3 and that based on my inquiry of those individuals responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

Steven M. Lange Senior Process Engineer — Steven M Lange — 29 Feb 00
Name and title of owner/operator or owner/operator's authorized representative — Signature — Date

☑ I have attached a site plan
☐ I have attached a list of site coordinate abbreviations
☐ I have attached a description of dikes and other safeguard measures

Revised June 1990 — 44° 0' N. Latitude 75° 58' W. Longitude — Form Approved OMB No. 2050-0072

Tier Two
EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Specific Information by Chemical

Facility Identification
Name: REXAM - DSI
Street: Bridge St.
City: Brownville Co.: Jefferson State: NY Zip: 13615
SIC Code: 2621 Dun/Brad Number: 62 339 3030

FOR OFFICIAL USE ONLY — ID#: ____ Date Received: ____

Owner/Operator Name
Name: REXAM - DSI Phone: 315-782-5800
Mail Addr.:

Emergency Contact
Name: Steven M Lange Title: Senior Process Engineer
Phone: 315-782-5800 24 Hr Phone: Same
Name: Arthur H. Hilts Title: Production Manager
Phone: 315-782-5800 24 Hr Phone: Same

Important: Read all instructions before completing form

Reporting Period: From January 1 to December 31, 19 99

☑ Check if the information below is identical to the information submitted last year

Chemical Description	Physical and Health Hazards (check all that apply)	Inventory	Container Type / Temp / Pressure	Storage Codes and Locations (Non-Confidential) — Storage Locations	Optional
CAS 106990 Trade Secret ☐ Chem. Name: Butadiene Check all that apply: ☐ Pure ☒ Mix ☐ Solid ☒ Liquid ☐ Gas ☒ EHS EHS Name:	☐ Fire ☐ Sudden release of pressure ☐ Reactivity ☒ Intermediate ☐ (acute) Delayed	01 Max Daily Amount (code) 01 Avg Daily Amount (code) 365 No. of Days On-site (code)	041 141	Location 3, 6 Location 3, 6 Present in Residual Amounts in Latex Emulsions	☐
CAS 100425 Trade Secret ☐ Chem. Name: Styrene Check all that apply: ☐ Pure ☒ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS EHS Name:	☐ Fire ☐ Sudden release of pressure ☐ Reactivity ☒ Intermediate ☐ (acute) Delayed	01 Max Daily Amount (code) 01 Avg Daily Amount (code) 365 No. of Days On-site (code)	141	Location 3, 6 Present in Residual Amounts in Latex Emulsions	☐
CAS ____ Trade Secret ☐ Chem. Name: ____ Check all that apply: ☐ Pure ☐ Mix ☐ Solid ☐ Liquid ☐ Gas ☐ EHS EHS Name:	☐ Fire ☐ Sudden release of pressure ☐ Reactivity ☐ Intermediate ☐ (acute) Delayed	____ Max Daily Amount (code) ____ Avg Daily Amount (code) ____ No. of Days On-site (code)	____	____	☐

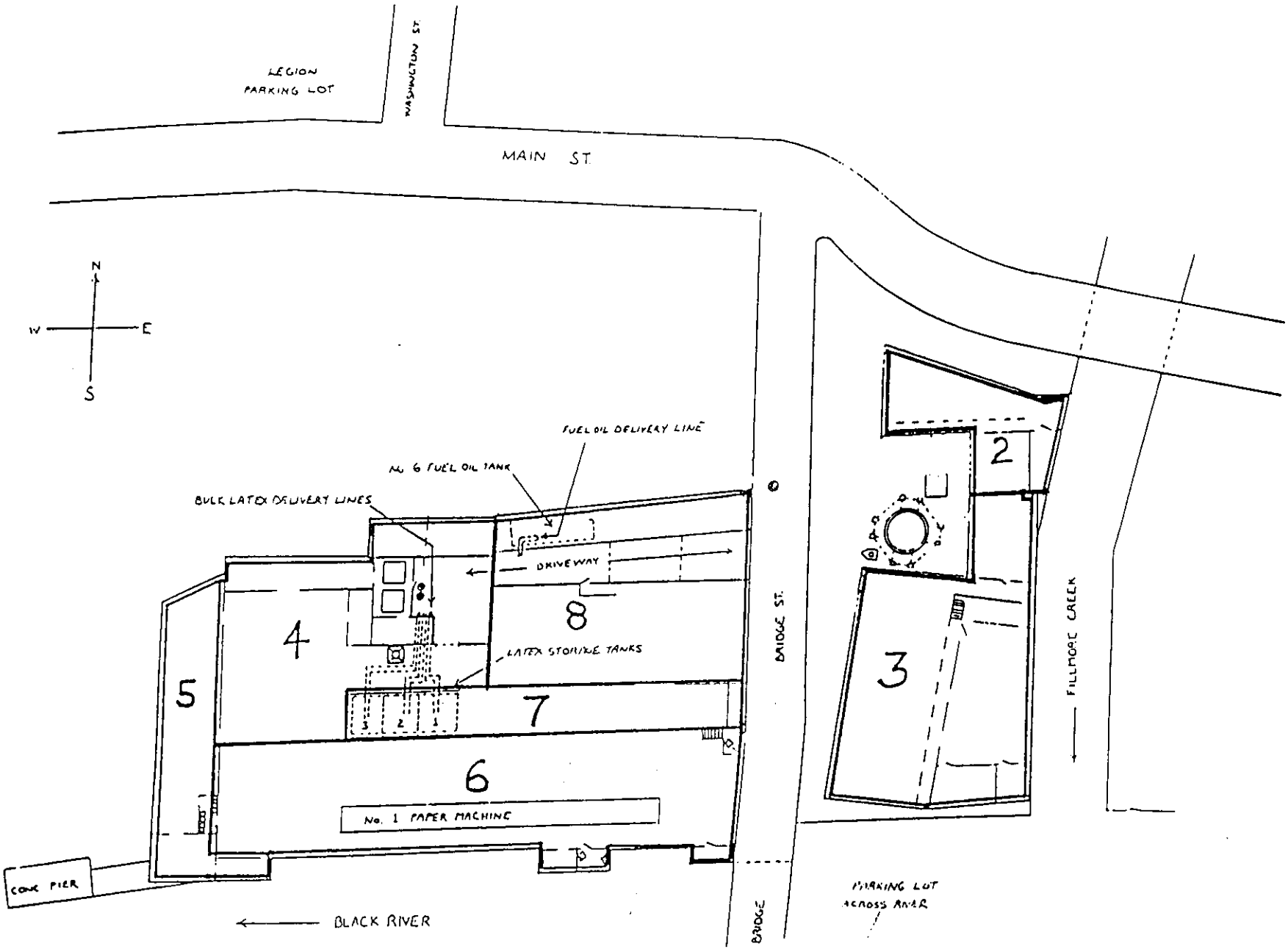
Certification *(Read and sign after completing all sections)*

I certify under penalty of law that I have personally examined and am familiar with the information in pages one through 3, and that based on my inquiry of those individuals responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

1. Steven M Lange Senior Process Engineer Steven M Lange 29Feb00

Name and title of operator or owner/operator's authorized representative — Signature — Date

☑ I have attached a site plan
☐ I have attached a list of site coordinate abbreviations
☐ I have attached a description of dikes and other safeguard measures


LEGION
PARKING LOT
WASHINGTON ST.
MAIN ST.
N
W
E
S
FUEL OIL DELIVERY LINE
No. 6 FUEL OIL TANK
BULK LATEX DELIVERY LINES
DRIVEWAY
LATEX STORAGE TANKS
BRIDGE ST.
4
5
8
7
6
3 2 1
No. 1 PAPER MACHINE
2
3
FILLMORE CREEK
COAL PIER
BLACK RIVER
BRIDGE
PARKING LOT
ACROSS RIVER

REXAM

REXAM DSI
BRIDGE STREET
BROWNVILLE NY 13615
USA
FAX 1 315 782 5416
TELEPHONE
1 315 782 5800

26 Feb 99

Thomas C. Bowman
LEPC Jefferson County
County Administration Building
175 Arsenal Street
Watertown, NY 13601

Dear Mr. Bowman,

Enclosed is a copy of the Tier Two Emergency and Hazardous Chemical Information for:

REXAM DSI
Bridge Street
Brownville, NY 13615

Feel free to contact me with any questions or comments.

Sincerely,

Steven M. Lange
Senior Process Engineer
Rexam - DSI Brownville, NY

cc: Norman K. Tomlinson - Rexam - DSI
Community Right to Know Emergency Coordinator - Brownville Fire Department
NYSDEC Bureau of Spill Responses

Revised June [illegible] N. Latitude 10 30 '. Longitude Form Approved OMB No. 0072

Tier Two
EMERGENCY AND HAZARDOUS CHEMICHAL INVENTORY

Specific Information by Chemical

Facility Identification
Name: REXAM - DSI
Street: Bridge St.
City: Brownville Co.: Jefferson State: NY Zip: 13615
SIC Code: 2621 Dun/Brad Number: 62 339 3030

FOR OFFICIAL USE ONLY — ID#: ____ Date Received: ____

Owner/Operator Name
Name: REXAM-DSI Phone: 315-782-5800
Mail Addr.: ____

Emergency Contact
Name: Steven M Lange Title: Senior Process Engineer
Phone: 315-782-5800 24 Hr Phone: Same
Name: Arthur H. Hilts Title: Production Manager
Phone: 315-782-5800 24 Hr Phone: Same

Important: Read all instructions before completing form

Reporting Period: From January 1 to December 31, 19__

☐ Check if the information below is identical to the information submitted last year

Chemical 1

CAS: 68476335 Trade Secret: ☐
Chem. Name: #6 Fuel Oil
Check all that apply: ☒ Pure ☐ Mix ☐ Solid ☐ Liquid ☐ Gas ☐ EHS
EHS Name: ____

Physical and Health Hazards (check all that apply):
☒ Fire
☐ Sudden release of pressure
☐ Reactivity
☐ Intermediate
☐ (acute) Delayed

Inventory:
05 Max Daily Amount (code)
05 Avg Daily Amount (code)
365 No. of Days On-site (code)

Container Type: C Temp: 4 Pressure: 1
Storage Codes and Locations (Non-Confidential) — Storage Locations: Location 8

Optional: ☑

Chemical 2

CAS: 50000 Trade Secret: ☐
Chem. Name: Formaldehyde
Check all that apply: ☐ Pure ☒ Mix ☐ Solid ☐ Liquid ☐ Gas ☒ EHS
EHS Name: ____

Physical and Health Hazards (check all that apply):
☐ Fire
☐ Sudden release of pressure
☐ Reactivity
☒ Intermediate
☒ (acute) Delayed

Inventory:
02 Max Daily Amount (code)
02 Avg Daily Amount (code)
365 No. of Days On-site (code)

Container Type: C Temp: 4 Pressure: 1
Storage Codes and Locations (Non-Confidential) — Storage Locations: Location 7
Location 3, 4, 6
Found in Residual Amounts in Latex Emulsions

Optional: ☐

Chemical 3

CAS: 107131 Trade Secret: ☐
Chem. Name: ____
Check all that apply: ☐ Pure ☒ Mix ☐ Solid ☐ Liquid ☐ Gas ☒ EHS
EHS Name: ____

Physical and Health Hazards (check all that apply):
☐ Fire
☐ Sudden release of pressure
☐ Reactivity
☒ Intermediate
☐ (acute) Delayed

Inventory:
01 Max Daily Amount (code)
01 Avg Daily Amount (code)
365 No. of Days On-site (code)

Container Type: C Temp: 4 Pressure: 1
Storage Codes and Locations (Non-Confidential) — Storage Locations: Location 8
Location 3, 4, 6
Found in Residual Amounts in Latex Emulsions

Optional: ☐

Certification *(Read and sign after completing all sections)*

I certify under penalty of law that I have personnaly examined and am familiar with the information in pages one through ____, and that based on my inquiry of those individuals responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

1 Steven M. Lange Senior Process Engineer Steven M. Lange 1 Mar 99
Name and title of owner/operator or owner/operator's authorized representative — Signature — Date

☐ I have attached a site plan
☐ I have attached a list of site coordinate abbreviations
☐ I have attached a description of dikes and other safeguard measures

IV. Latitude 15 5 V. Longitude

Tier Two
EMERGENCY AND HAZARDOUS CHEMICHAL INVENTORY

Specific Information by Chemical

Facility Identification
Name: REXAM - DSI
Street: Bridge St.
City: Brownville Co.: Jefferson State: NY Zip: 13615
SIC Code: 2621 Dun/Brad Number: 62 339 3030

FOR OFFICIAL USE ONLY
ID#
Date Received

Owner/Operator Name
Name: REXAM - DSI Phone: 315-782-5800
Mail Addr.

Emergency Contact
Name: Steven M Lange Title: Senior Process Engineer
Phone: 315-782-5800 24 Hr Phone: Same
Name: Arthur H. Hitts Title: Production Manager
Phone: 315-782-5800 24 Hr Phone: Same

Pages
Form Approved OMB No. (8)12

Important: Read all instructions before completing form

Reporting Period: From January 1 to December 31, 19

☐ Check if the information below is identical to the information submitted last year

Chemical Description	Physical and Health Hazards (check all that apply)	Inventory	Container Type / Temp / Pressure; Storage Codes and Locations (Non-Confidential) — Storage Locations	Optional
CAS 7664417 Trade Secret ☐ Chem. Name: Ammonia 30% Check all that apply: ☐ Pure ☒ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS EHS Name:	☐ Fire ☐ Sudden release of pressure ☐ Reactivity ☒ Intermediate ☐ (ocute) Delayed	03 Max Daily Amount (code) 03 Avg Daily Amount (code) 365 No. of Days On-site (code)	041 Location 8 30% Ammonium Hydroxide	☑
CAS 107211 Trade Secret ☐ Chem. Name: Ethylene Glyca Check all that apply: ☐ Pure ☒ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS EHS Name:	☐ Fire ☐ Sudden release of pressure ☐ Reactivity ☒ Intermediate ☐ (ocute) Delayed	03 Max Daily Amount (code) 03 Avg Daily Amount (code) 365 No. of Days On-site (code)	052 Location 5	☑
CAS 57136 Trade Secret ☐ Chem. Name: Urea Check all that apply: ☐ Pure ☐ Mix ☒ Solid ☐ Liquid ☐ Gas ☐ EHS EHS Name:	☐ Fire ☐ Sudden release of pressure ☐ Reactivity ☒ Intermediate ☐ (ocute) Delayed	03 Max Daily Amount (code) 03 Avg Daily Amount (code) 365 No. of Days On-site (code)	J41 Location 6,3	☑

Certification *(Read and sign after completing all sections)*

I certify under penalty of law that I have personnaly examined and am familiar with the information in pages one through _____ and that based on my inquiry of those individuals responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

Steven M Lange, Senior Process Engineer — Steven M Lange — 1 Mar 99
Name and title of owner/operator or owner/operator's authorized representative — Signature — Date

☑ I have attached a site plan
☐ I have attached a list of site coordinate abbreviations
☐ I have attached a description of dikes and

N. Latitude 75° E. Longitude

Page 2 of pages

Form Approved OMB No. 0117

Tier Two
EMERGENCY AND HAZARDOUS CHEMICHAL INVENTORY

Specific Information by Chemical

Facility Identification
Name: REXAM - DSI
Street: Bridge St.
City: Brownville Co.: Jefferson State: NY Zip: 13615
SIC Code: 2621 Dun/Brad Number: 62 339 3030

FOR OFFICIAL USE ONLY
ID#:
Date Received:

Owner/Operator Name
Name: REXAM-DSI Phone: 315-782-5800
Mail Addr.:

Emergency Contact
Name: Steven M Lange Title: Senior Process Engineer
Phone: 315-782-5800 24 Hr Phone: Same
Name: Arthur H. Hilts Title: Production Manager
Phone: 315-782-5800 24 Hr Phone: Same

Important: Read all instructions before completing form

Reporting Period: From January 1 to December 31, 19__

☐ Check if the information below is identical to the information submitted last year

Chemical Description

Physical and Health Hazards (check all that apply)

Inventory

Storage Codes and Locations (Non-Confidential)

Container Type / Temp / Pressure — Storage Locations — (Optional)

CAS 106990 Trade Secret ☐
Chem. Name: Butadiene
Check all that apply: ☐ Pure ☒ Mix ☐ Solid ☒ Liquid ☐ Gas ☒ EHS
EHS Name:

Physical and Health Hazards: ☐ Fire ☐ Sudden release of pressure ☒ Reactivity ☒ Intermediate ☐ (acute) Delayed

Inventory: 01 Max Daily Amount (code); 01 Avg Daily Amount (code); 365 No. of Days On-site (code)

Container Type / Temp / Pressure: D 4 1 / I 4 1

Storage Locations: Location 3,6
Location 3,6
Present in Residual Amounts in Latex Emulsions

(Optional) ☐

CAS 100425 Trade Secret ☐
Chem. Name: Styrene
Check all that apply: ☐ Pure ☒ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS
EHS Name:

Physical and Health Hazards: ☐ Fire ☐ Sudden release of pressure ☒ Reactivity ☒ Intermediate ☐ (acute) Delayed

Inventory: 01 Max Daily Amount (code); 01 Avg Daily Amount (code); 365 No. of Days On-site (code)

Container Type / Temp / Pressure: I 4 1

Storage Locations: Location 3,6
Present in Residual Amounts in Latex Emulsions

(Optional) ☐

CAS ☐ Trade Secret ☐
Chem. Name:
Check all that apply: ☐ Pure ☐ Mix ☐ Solid ☐ Liquid ☐ Gas ☐ EHS
EHS Name:

Physical and Health Hazards: ☐ Fire ☐ Sudden release of pressure ☐ Reactivity ☐ Intermediate ☐ (acute) Delayed

Inventory: Max Daily Amount (code); Avg Daily Amount (code); No. of Days On-site (code)

Container Type / Temp / Pressure:

Storage Locations:

(Optional) ☐

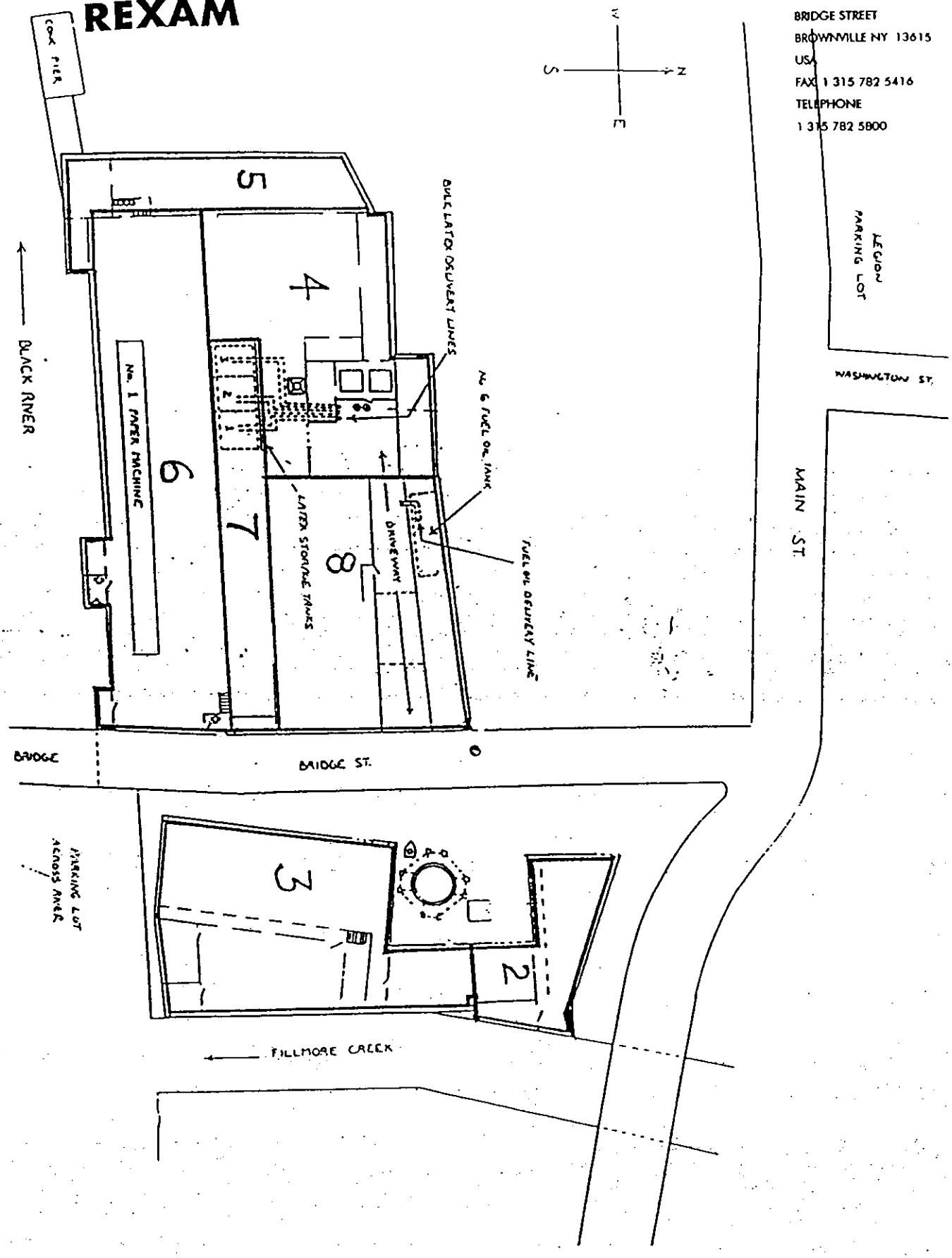
Certification *(Read and sign after completing all sections)*

I certify under penalty of law that I have personally examined and am familiar with the information in pages one through _____ and that based on my inquiry of those individuals responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

1 Steven M Lange Senior Process Engineer Steven M Lange 1 Mar 99
Name and title of owner/operator or owner/operator's authorized representative — Signature — Date

☒ I have attached a site plan
☐ I have attached a list of site coordinate abbreviations
☐ I have attached a description of ...

REXAM DSI
BRIDGE STREET
BROWNVILLE NY 13615
USA
FAX 1 315 782 5416
TELEPHONE
1 315 782 5800



APPENDIX 35

MSDS Listing

Cassimgen (→)

		Raw Material Usage 5 Feb 96 - 4 Feb 97 Sorted by Class Code ** UOM's Vary !!!			
		Data taken from MF R 125			
	Part #	Desription		Amount	UOM
1	70132	MACKENZIE MK-90P SOFTWOOD	FLETCHER CHALLENGE	5,379.50	BA
2	70143	GRANDE PRAIRIE SOFTWOOD	WEYERHAUSER	6,951.75	BA
3	70169	WESTVACO PINNACLEPRIME HARDWD	WESTVACO	20.00	BA
4	70178	NYLON6 1/4"x3dmf MINIFIBERS	MINIFIBERS	61,825.00	PD
5	70191	DELTA STOCK	REXAM -WS	4,820.00	PD
6	70204	ARACRUZ BLEACHEDEUCALYPTUS,STD	ARACRUZ	9,731.00	BA
7	70205	OHIO 20%MIN POST-CONSUMER	OHIO PULP	16.00	BA
8	70212	ALABAMA PINE PULP	ALABAMA PIANE	179.00	BA
9	70213	CELGAR SOFTWOOD "CELECT"	STONE INTERNATIONAL	0.00	BA
10	70216	JARILIPTUS BL. EUCALYPTUS		0.00	BA
11	70217	BAHIA SUL PRIME EUCALYPTUS	CELLMARK	3,641.00	BA
12	71035	ERIOSIN RED GR	CIBA - GEIGY	0.00	PD
13	71101	ERIO YELLOW "T" SUPRA	CIBA - GEIGY	18.70	PD
14	71105	DIPHENYL YELLOW G EXTRA	CIBA - GEIGY	1.96	PD
15	71118	TINOPAL PT LIQUID	SLACK	25,553.81	PW
16	71121	PONTAMINE KRAFT ORANGE A LIQ.	BAYER	9,582.17	PW
17	71122	PONTAMINE YELLOW GXG LIQUID	BAYER	1,734.09	PW
18	71127	PONTAMINE BLACK SP LIQUID	BAYER	7,400.18	PW
19	71141	INTRABOND LIQUID RED 5BB	CROMPTON & KNOWLES	19,739.20	PW
20	71146	ARTILENE RED 1116-9 PASTE	CLARIANT	443.75	PW
21	71147	ARTILENE BLACK 9564-9 PASTE	CLARIANT	1,686.00	PW
22	71148	INTRABOND LIQ. TURQUOISE GLL	CROMPTON & KNOWLES	2,771.41	PD
23	71150	PERMABLAK 215 A	MONOCHEM	291,659.87	PW
24	71151	INTRACID PURE BLUE L PASTE	CLARIANT	90.45	PW
25	71157	CARTA VIOLET 3B LIQUID 080	CLARIANT	1,093.20	PW
26	71160	ANTHOSIN RED 28L LIQUID		0.00	PW
27	71162	ARTILENE YELLOW 4534-9 PASTE	CLARIANT	295.75	PW
28	71164	BHD 6015 BLUE	SUNCHEM	313.33	PW
29	72051	BUSPERSE 47	BUCKMAN	0.00	PW
30	72903	#1 KYMENE 557H		4,015.00	PW
31	72959	SODIUM HYDROXIDE	SLACK	5,026.00	PW
32	72965	BELCOR 585-K	BELCOR	2,150.00	PW
33	72971	AMRES 8855LE	SLACK / GP	77,088.00	PW
34	72972	AMRES HS30	SLACK / GP	57,006.10	PW
35	78000	WATER		0.00	GA
36	73004	24-Apr-07	BFGOODRICH	1,183,374.00	PW
37	73042	26138 (XPE-138)	BFGOODRICH	565,686.45	PW
38	73050	12-May-73	BFGOODRICH	5,422,944.80	PW
39	73070	BUTOFAN NS 278	BASF	29,250.00	PW
40	73087	TYLAC 97861-00	REICHOLD	8,460.00	PW
41	73094	AIRFLEX 100HS	AIR PRODUCTS	694,567.00	PW
42	73097	RHOPLEX R-225 (6-4225)	ROHM & HAAS	9,705.00	PW
43	73098	TYLAC 68159-00	REICHOLD	23,022.00	PW
44	73107	2-May-07	BFGOODRICH	313,340.00	PW
45	74092	OXALIC ACID	SLACK	556.92	PD
46	74093	UREA	SLACK	137,487.50	PD
47	74096	ACETIC ACID	SLACK	23,257.62	PW
48	74099	7498 LIQUID	CLARIANT	151,417.84	PW
49	74109	DEFOAMER L-474	ASHLAND	6,031.27	PW
50	74130	AMERGEL - 100 ANTIFOAM	ASHLAND	999.94	GA
51	74142	8162 EMULSION	BERCEN	412,040.61	PW
52	74149	CATALYST KR	CLARIANT	3,576.40	PW
53	74156	ETHOX 3115	ETHOX	24,703.01	PW
54	74201	METSOL DT3H	CALGON	317.75	PD
55	77001	AQUA AMMONIA	SLACK	8,968.78	PW

56	77056	PENFORD GUM 280	PENFORD PRODUCTS	87,400.00	PD
57	77084	ULTRA GLOSS 90	ENGELHARD	990,155.00	PD
58	77104	FOAMMASTER NXZ	ASTRO	5,328.07	PW
59	77126	TSPP	SLACK	2,505.55	PD
60	77141	BUBBLEBREAKER 748 DEFOAMER	WITCO	1,413.57	PW
61	77144	TITINT WHITE R	TECHNICAL INDUSTRIES	20,139.00	PD
62	77145	RPS VANTAGE TI02	DUPONT	63,539.00	PW
63	77156	TINOPAL CBS-X	CIBA - GEIGY	727.48	PW
64	77173	POLY-EM 40	CHEMICAL CORP	17,044.50	PW
65	77185	HT CLAY	ENGELHARD	261,150.00	PD
66	77187	ULTRA WHITE 90	ENGELHARD	1,063,875.00	PD
67	77189	ANSILEX 93	ENGELHARD	248,630.00	PD
68	77193	ROPAQUE HP-91 (7-1066)	ROHM & HAAS	160,045.00	PW
69	77194	FOAMASTER VF	HENKEL	2,934.95	PD
70	77197	CALGON T	CALGON	739.30	PD
71	77201	DISPEX N40	ALLIED CLLOIDS	2,133.61	PW
72	77203	TAMOL 850	TEXTILE	3,363.80	PW
73	77204	SYLOID W 500	WR GRACE	34,822.00	PW
74	77206	WITCO 3056A DEFOAMER	WITCO	2,000.74	PW
75	77207	TACKIDEX 332F	ROQUETTE	5,709.00	PD
76	77929	CALCIUM CARBONATE H-90	OMYA	319,256.90	PW
77	77930	CALCIUM CARBONATE COVERCARB	OMYA	113,475.00	PW

		Sorted by Supplier	Indexed by Supplier							
1	Part #	Product	Supplier		uom	Class	H	F	R	PP
41	73094	AIRFLEX 100HS	Air Products	1/20/89	PW	173				
9	70212	ALABAMA PINE PULP	Alabama Pine	1/13/94	BA	170				
71	77201	DISPEX N40	Allied Colloids	1/17/94	PW	177				
7	70204	ARACRUZ BLEACHEDEUCALYPTUS,STD	Aracruz Cellulose	2/3/92	BA	170				
58	77104	FOAMMASTER NXZ	Astro	1/20/89	PW	177				
39	73070	BUTOFAN NS 278	BASF	1/20/89	PW	173				
20	71127	PONTAMINE BLACK SP LIQUID	Bayer	1/20/89	PW	171				
19	71122	PONTAMINE YELLOW GXG LIQUID	Bayer	1/20/89	PW	171				
18	71121	PONTAMINE KRAFT ORANGE A LIQ.	Bayer	1/20/89	PW	171				
32	72965	BELCOR 585-K	Belcor	6/9/93	PW	172				
51	74142	8162 EMULSION	Bercen	1/20/89	PW	174				
44	73107	2679	BF Goodrich	10/27/94	PW	173				
38	73050	26796	BF Goodrich	1/20/89	PW	173				
37	73042	XPE-138	BF Goodrich	11/22/89	PW	173				
36	73004	2671	BF Goodrich	1/20/89	PW	173				
30	72051	BUSPERSE 47	Buckman	1/20/89	PW	172				
54	74201	METSOL DT3H	Calgon	1/17/94	PD	174				
70	77197	CALGON T	Calgon Corp	3/30/92	PD	177				
11	70217	BAHIA SUL PRIME EUCALYPTUS	Cellmark	11/1/94	BA	170				
64	77173	POLY-EM 40	Chemical Corp	2/21/89	PW	177				
63	77156	TINOPAL CBS-X	Ciba-Geigy	4/28/89	PW	177				
16	71105	DIPHENYL YELLOW G EXTRA	Ciba-Geigy	1/20/89	PD	171				
15	71101	ERIO YELLOW "T" SUPRA	Ciba-Geigy	1/20/89	PD	171				
14	71035	ERIOSIN RED GR	Ciba-Geigy	1/20/89	PD	171				
52	74149	CATALYST KR	Clariant	8/25/89	PW	174				
48	74099	7498 LIQUID	Clariant	1/20/89	PW	174				
28	71162	ARTILENE YELLOW 4534-9 PASTE	Clariant	4/5/94	PW	171				
27	71157	CARTA VIOLET 3B LIQUID 080	Clariant	10/30/89	PW	171				
26	71151	INTRACID PURE BLUE L PASTE	~~Clariant~~ C+K	1/20/89	PW	171				
23	71147	ARTILENE BLACK 9564-9 PASTE	Clariant	5/16/90	PW	171				
22	71146	ARTILENE RED 1116-9 PASTE	Clariant	4/5/94	PW	171				
24	71148	INTRABOND LIQ. TURQUOISE GLL	Crompton & Knowles	1/16/91	PD	171				
21	71141	INTRABOND LIQUID RED 5BB	Crompton & Knowles	1/20/89	PW	171				
50	74130	AMERGEL - 100 ANTIFOAM	~~Drew~~ Ashland	1/20/89	GA	174				
49	74109	DEFOAMER L-474	~~Drew~~ Ashland	1/20/89	PW	174				
67	77189	ANSILEX 93	Engelhard	1/6/92	PD	177				
66	77187	ULTRA WHITE 90	Engelhard	1/6/92	PD	177				
65	77185	HT CLAY	Engelhard	12/14/90	PD	177				
57	77084	ULTRA GLOSS 90	Engelhard	3/20/89	PD	177				
53	74156	ETHOX 3115	Ethox	6/23/92	PW	174				
2	70132	MACKENZIE MK-90P SOFTWOOD	Fletcher Challenge	1/20/89	BA	170				
69	77194	FOAMASTER VF + NS1	Henkel	3/30/92	PD	177				
13	70219	POLYESTER 1/4"X3D MINIFIBERS	Minifibers	12/20/94	PD	170				
5	70178	NYLON6 1/4"x3dmf MINIFIBERS	Minifibers	1/20/89	PD	170				
25	71150	PERMABLAK 215 A	MonoChem	1/20/89	PW	171				
12	70218	OHIO 50%MIN POST-CONSUMER	Ohio Pulp Mills	2/24/95	BA	170				
8	70205	OHIO 20%MIN POST-CONSUMER	Ohio Pulp Mills	4/23/92	BA	170				
78	77930	CALCIUM CARBONATE COVERCARB	Omya	8/1/96	PW	177				
77	77929	CALCIUM CARBONATE H-90	Omya	1/20/89	PW	177				
56	77056	PENFORD GUM 280	Penford Products	1/20/89	PD	177				
43	73098	TYLAC 68159-00	Reichold	2/28/92	PW	173				
40	73087	TYLAC 97861-00	Reichold	1/20/89	PW	173				
6	70191	DELTA STOCK	Rexam - WS	1/20/89	PD	170				
68	77193	ROPAQUE HP-91 (7-1066)	Rohm & Haas	1/6/92	PW	177				
60	77127	TAMOL L CONCENTRATE	Rohm & Haas	1/20/89	PW	177				
42	73097	RHOPLEX R-225 (6-4225)	Rohm & Haas	10/1/92	PW	173				
76	77207	TACKIDEX 332F	Roquette	1/25/96	PD	177				
59	77126	TSPP	Slack	1/20/89	PD	177				
55	77001	AQUA AMMONIA	Slack	1/20/89	PW	177				
47	74096	ACETIC ACID	Slack	1/20/89	PW	174				
46	74093	UREA	Slack	1/20/89	PD	174				
45	74092	OXALIC ACID	Slack	1/20/89	PD	174				
31	72959	SODIUM HYDROXIDE	Slack	6/26/90	PW	172				
17	71118	TINOPAL PT LIQUID	Slack	1/20/89	PW	171				

Alum slack

Sodium Hypochlorite Slack
Sta Aloc 334 Slack

34	72972	AMRES HS30	Slack /Georgia Pacific	6/25/96	PW	172				
33	72971	AMRES 8855LE	Slack /Georgia Pacific	1/9/96	PW	172				
10	70213	CELGAR SOFTWOOD "CELECT"	Stone International	1/21/94	BA	170				
29	71164	BHD 6015 BLUE	SunChem	3/16/94	PW	171				
62	77144	TITINT WHITE R	Technical Industries	1/20/89	PD	177				
72	77203	TAMOL 850	Textile	11/21/94	PW	177				
4	70169	WESTVACO PINNACLEPRIME HARDWD	Westvaco	1/20/89	BA	170				
3	70143	GRANDE PRAIRIE SOFTWOOD	Weyerhauser	1/20/89	BA	170				
75	77206	WITCO 3056A DEFOAMER	Witco	3/8/95	PW	177				
74	77205	BUBBLEBREAKER 900 DEFOAMER	Witco	3/8/95	PW	177				
61	77141	BUBBLEBREAKER 748 DEFOAMER	Witco	1/20/89	PW	177				
73	77204	SYLOID W 500	WR Grace	11/21/94	PW	177				
35	78000	WATER		12/10/93	GA	172				
	516	516 Oderless Buffer	BetzDearborn		Reage	Boiler				
	519	519 Total Hardness Indicator	BetzDearborn		Reage	Boiler				
	597	597 Low Hardness Titrant	BetzDearborn		Reage	Boiler				
	535	535 Phenolphthalein	BetzDearborn		Reage	Boiler				
	529	529 Methyl Purple Indicator	BetzDearborn		Reage	Boiler				
	555	555 Sulfuric Acid N/50	BetzDearborn		Reage	Boiler				
	552	552 Starch Acid Indicator Powder	BetzDearborn		Reage	Boiler				
	553	553 Potassium Iodine/Iodate N/126	BetzDearborn		Reage	Boiler				
	576	576 2,000 Umhos Conductance Standard	BetzDearborn		Reage	Boiler				
	288	288-1 Polymer Buffer	BetzDearborn		Reage	Boiler				
	289	289 Polymer Reagent	BetzDearborn		Reage	Boiler				
	523	523 1:1 Hydrochloric Acid	BetzDearborn		Reage	Boiler				
	594	594 Polytitrant Solution	BetzDearborn		Reage	Boiler				
	563	563 Baseline Indicator Powder	BetzDearborn		Reage	Boiler				
	567	567 Neutraling Solution	BetzDearborn		Reage	Boiler				
		Dearborn 62				Boiler				
		Baseline 655				Boiler				
		Steamate 2007				Boiler				
		Deartreat 1050				Boiler				
		Nutmeg 7D-24 (Fuel Oil Treatment)				Boiler				
		Salt Pellets				Boiler				

		Sorted by Class Code	Indexed by Supplier							
1	Part #	Product	Supplier		uom	Class	H	F	R	PP
2	70132	MACKENZIE MK-90P SOFTWOOD	Fletcher Challenge	1/20/89	BA	170				
3	70143	GRANDE PRAIRIE SOFTWOOD	Weyerhauser	1/20/89	BA	170				
4	70169	WESTVACO PINNACLEPRIME HARDWD	Westvaco	1/20/89	BA	170				
5	70178	NYLON6 1/4"x3dmf MINIFIBERS	Minifibers	1/20/89	PD	170				
6	70191	DELTA STOCK	Rexam - WS	1/20/89	PD	170				
7	70204	ARACRUZ BLEACHEDEUCALYPTUS,STD	Aracruz Cellulose	2/3/92	BA	170				
8	70205	OHIO 20%MIN POST-CONSUMER	Ohio Pulp Mills	4/23/92	BA	170				
9	70212	ALABAMA PINE PULP	Alabama Pine	1/13/94	BA	170				
10	70213	CELGAR SOFTWOOD "CELECT"	Stone International	1/21/94	BA	170				
11	70217	BAHIA SUL PRIME EUCALYPTUS	Cellmark	11/1/94	BA	170				
12	70218	OHIO 50%MIN POST-CONSUMER	Ohio Pulp Mills	2/24/95	BA	170				
13	70219	POLYESTER 1/4"X3D MINIFIBERS	Minifibers	12/20/94	PD	170				
14	71035	ERIOSIN RED GR	Ciba-Geigy	1/20/89	PD	171				
15	71101	ERIO YELLOW "T" SUPRA	Ciba-Geigy	1/20/89	PD	171				
16	71105	DIPHENYL YELLOW G EXTRA	Ciba-Geigy	1/20/89	PD	171				
17	71118	TINOPAL PT LIQUID	Slack	1/20/89	PW	171				
18	71121	PONTAMINE KRAFT ORANGE A LIQ.	Bayer	1/20/89	PW	171				
19	71122	PONTAMINE YELLOW GXG LIQUID	Bayer	1/20/89	PW	171				
20	71127	PONTAMINE BLACK SP LIQUID	Bayer	1/20/89	PW	171				
21	71141	INTRABOND LIQUID RED 5BB	Crompton & Knowles	1/20/89	PW	171				
22	71146	ARTILENE RED 1116-9 PASTE	Clariant	4/5/94	PW	171				
23	71147	ARTILENE BLACK 9564-9 PASTE	Clariant	5/16/90	PW	171				
24	71148	INTRABOND LIQ. TURQUOISE GLL	Crompton & Knowles	1/16/91	PD	171				
25	71150	PERMABLAK 215 A	MonoChem	1/20/89	PW	171				
26	71151	INTRACID PURE BLUE L PASTE	Clariant	1/20/89	PW	171				
27	71157	CARTA VIOLET 3B LIQUID 080	Clariant	10/30/89	PW	171				
28	71162	ARTILENE YELLOW 4534-9 PASTE	Clariant	4/5/94	PW	171				
29	71164	BHD 6015 BLUE	SunChem	3/16/94	PW	171				
30	72051	BUSPERSE 47	Buckman	1/20/89	PW	172				
31	72959	SODIUM HYDROXIDE	Slack	6/26/90	PW	172				
32	72965	BELCOR 585-K	Belcor	6/9/93	PW	172				
33	72971	AMRES 8855LE	Slack /Georgia Pacific	1/9/96	PW	172				
34	72972	AMRES HS30	Slack /Georgia Pacific	6/25/96	PW	172				
35	78000	WATER		12/10/93	GA	172				
36	73004	2671	BF Goodrich	1/20/89	PW	173				
37	73042	XPE-138	BF Goodrich	11/22/89	PW	173				
38	73050	26796	BF Goodrich	1/20/89	PW	173				
39	73070	BUTOFAN NS 278	BASF	1/20/89	PW	173				
40	73087	TYLAC 97861-00	Reichold	1/20/89	PW	173				
41	73094	AIRFLEX 100HS	Air Products	1/20/89	PW	173				
42	73097	RHOPLEX R-225 (6-4225)	Rohm & Haas	10/1/92	PW	173				
43	73098	TYLAC 68159-00	Reichold	2/28/92	PW	173				
44	73107	2679	BF Goodrich	10/27/94	PW	173				
45	74092	OXALIC ACID	Slack	1/20/89	PD	174				
46	74093	UREA	Slack	1/20/89	PD	174				
47	74096	ACETIC ACID	Slack	1/20/89	PW	174				
48	74099	7498 LIQUID	Clariant	1/20/89	PW	174				
49	74109	DEFOAMER L-474	~~Drew~~ Ashland	1/20/89	PW	174				
50	74130	AMERGEL - 100 ANTIFOAM	~~Drew~~ Ashland	1/20/89	GA	174				
51	74142	8162 EMULSION	Bercen	1/20/89	PW	174				
52	74149	CATALYST KR	Clariant	8/25/89	PW	174				
53	74156	ETHOX 3115	Ethox	6/23/92	PW	174				
54	74201	METSOL DT3H	Calgon	1/17/94	PD	174				
55	77001	AQUA AMMONIA	Slack	1/20/89	PW	177				
56	77056	PENFORD GUM 280	Penford Products	1/20/89	PD	177				
57	77084	ULTRA GLOSS 90	Engelhard	3/20/89	PD	177				
58	77104	FOAMMASTER NXZ	Astro	1/20/89	PW	177				
59	77126	TSPP	Slack	1/20/89	PD	177				
60	77127	TAMOL L CONCENTRATE	Rohm & Haas	1/20/89	PW	177				
61	77141	BUBBLEBREAKER 748 DEFOAMER	Witco	1/20/89	PW	177				
62	77144	TITINT WHITE R	Technical Industries	1/20/89	PD	177				
63	77156	TINOPAL CBS-X	Ciba-Geigy	4/28/89	PW	177				
64	77173	POLY-EM 40	Chemical Corp	2/21/89	PW	177				
65	77185	HT CLAY	Engelhard	12/14/90	PD	177				
66	77187	ULTRA WHITE 90	Engelhard	1/6/92	PD	177				

67	77189	ANSILEX 93	Engelhard	1/6/92	PD	177				
68	77193	ROPAQUE HP-91 (7-1066)	Rohm & Haas	1/6/92	PW	177				
69	77194	FOAMASTER VF	Henkel	3/30/92	PD	177				
70	77197	CALGON T	Calgon Corp	3/30/92	PD	177				
71	77201	DISPEX N40	Allied Colloids	1/17/94	PW	177				
72	77203	TAMOL 850	Textile	11/21/94	PW	177				
73	77204	SYLOID W 500	WR Grace	11/21/94	PW	177				
74	77205	BUBBLEBREAKER 900 DEFOAMER	Witco	3/8/95	PW	177				
75	77206	WITCO 3056A DEFOAMER	Witco	3/8/95	PW	177				
76	77207	TACKIDEX 332F	Roquette	1/25/96	PD	177				
77	77929	CALCIUM CARBONATE H-90	Omya	1/20/89	PW	177				
78	77930	CALCIUM CARBONATE COVERCARB	Omya	8/1/96	PW	177				
	516	516 Oderless Buffer	BetzDearborn		Reage	Boiler				
	519	519 Total Hardness Indicator	BetzDearborn		Reage	Boiler				
	597	597 Low Hardness Titrant	BetzDearborn		Reage	Boiler				
	535	535 Phenolphthalein	BetzDearborn		Reage	Boiler				
	529	529 Methyl Purple Indicator	BetzDearborn		Reage	Boiler				
	555	555 Sulfuric Acid N/50	BetzDearborn		Reage	Boiler				
	552	552 Starch Acid Indicator Powder	BetzDearborn		Reage	Boiler				
	553	553 Potassium Iodine/Iodate N/126	BetzDearborn		Reage	Boiler				
	576	576 2,000 Umhos Conductance Standard	BetzDearborn		Reage	Boiler				
	288	288-1 Polymer Buffer	BetzDearborn		Reage	Boiler				
	289	289 Polymer Reagent	BetzDearborn		Reage	Boiler				
	523	523 1:1 Hydrochloric Acid	BetzDearborn		Reage	Boiler				
	594	594 Polytitrant Solution	BetzDearborn		Reage	Boiler				
	563	563 Baseline Indicator Powder	BetzDearborn		Reage	Boiler				
	567	567 Neutraling Solution	BetzDearborn		Reage	Boiler				
		Dearborn 62				Boiler				
		Baseline 655				Boiler				
		Steamate 2007				Boiler				
		Deartreat 1050				Boiler				
		Nutmeg 7D-24 (Fuel Oil Treatment)				Boiler				
		Salt Pellets				Boiler				

APPENDIX 36

DOT Hazardous Materials Registration

BV

UNITED STATES OF AMERICA
DEPARTMENT OF TRANSPORTATION
RESEARCH AND SPECIAL PROGRAMS ADMINISTRATION

HAZARDOUS MATERIALS CERTIFICATE OF REGISTRATION

Registrant: REXAM DSI
Attn: John Mumer
PO Box 6001
West Springfield, MA 01090-6001

This certifies that the registrant is registered with the U.S. Department of Transportation as required by 49 CFR Part 107, Subpart G.

This certificate is issued under the authority of Section 106(c)(1) of the Hazardous Materials Transportation Act, 49 App. U.S.C. 1801, et. seq. It is unlawful to alter or falsify this document.

Reg. No: 070798 011 013G Issued: 07/08/98 Expires: 06/30/99

Recordkeeping Requirements for the Registration Program

The following must be maintained at the principal place of business for a period of three years from the date of issuance of this Certificate of Registration:

(1) A copy of the registration statement filed with RSPA; and
(2) This Certificate of Registration.

Each person subject to the registration requirement must furnish that person's Certificate of Registration (or a copy) and all other records and information pertaining to the information contained in the registration statement to an authorized representative or special agent of the U.S. Department of Transportation upon request.

Each motor carrier (private or for-hire) and each vessel operator subject to the registration requirement must keep a copy of the current Certificate of Registration or another document bearing the registration number identified as the "U.S. DOT Hazmat Reg. No." in each truck and truck tractor or vessel (trailers and semi-trailers not included) used to transport hazardous materials subject to the registration requirement. The Certificate of Registration or document bearing the registration number must be made avialable, upon request, to enforcement personnel.

For information, contact the Hazardous Materials Registration Manager, DHM-60 Research and Special Programs Administration, U.S. Department of Transportation, 400 Seventh Street, SW, Washington, DC 20590, telephone (202)366-4109.

APPENDIX 37

Typical Disposal Manifests and Bills of Lading

0 1

K52308-R3076 SEL ID: KH1

SAFETY-KLEEN SYSTEMS, INC.

DATE: 05/12/00 PAGE: 1

PRINT LOC: 218701

FROM: 01/01/99
THRU: 12/31/99

GENERATOR WASTE REPORT
FED ID: NYD982188427 PREMOID DIVISION

NOT TO BE USED AS SOLE SOURCE FOR REPORTING PURPOSES

REQ BY: BRN3R03 HOTALING, MA

GENERATOR: NYD982188427 REXAM/DSI BRIDGE ST BROWNVILLE NY 13615
NYD982188427

FACILITY NAME/ADDRESS SK ID/FED EPA ID/STATE EPA ID

Partswasher account
unit of measure is pounds

SAFETY-KLEEN SYSTEMS, INC. 2-187-01
6741 VIP PARKWAY NYD982743312

SYRACUSE NY 13211

SVC DATE	SVC DOC / MANIFEST DOC	TRANSPRTR ID	WSTE CDS	CNT TYP	#OF CNT	U M	QUANTITY	HDL CD	SK-DOT	WASTE DESCRIPTION	CD	TRACKING NUMBER
02/08/99	000066	ILD984908202	D039	DM	1	P	93.8		0000717	WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA)NA1993 PGIII (ERG#128) 6.7LBS/GAL (D039) ORG: SRC: FRM: Q/F SYS: / IL M/W CD: /	PP	
05/04/99	000023	ILD984908202	D039	DM	1	P	100.5		0000717	WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA)NA1993 PGIII (ERG#128) 6.7LBS/GAL (D039) ORG: SRC: FRM: Q/F SYS: / IL M/W CD: /	PP	
07/27/99	000031	ILD984908202	D039	DM	1	P	100.5		0000717	WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA)NA1993 PGIII (ERG#128) 6.7LBS/GAL (D039) ORG: SRC: FRM: Q/F SYS: / IL M/W CD: /	PP	
08/26/99	000018	ILD984908202	D039	DM	2	P	214.4		0000717	WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA)NA1993 PGIII (ERG#128) 6.7LBS/GAL (D039) ORG: SRC: FRM: Q/F SYS: / IL M/W CD: /	PP	
11/18/99	000044	ILD984908202	D039	DM	1	P	87.1		0000717	WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA)NA1993 PGIII (ERG#128) 6.7LBS/GAL (D039) ORG: SRC: FRM: Q/F SYS: / IL M/W CD: /	PP	
	FACILITY =		D039			P	596.3		0000717	WASTE COMBUSTIBLE LIQUID, N.O.S.		
							596.3					

ADVANCED ENVIRON RECYCLING 9-999-99
2591 MITCHELL AVE PAD987367216

ALLENTOWN PA 18103

SVC DATE	SVC DOC / MANIFEST DOC	TRANSPRTR ID	WSTE CDS	CNT TYP	#OF CNT	U M	QUANTITY	HDL CD	SK-DOT	WASTE DESCRIPTION	CD	TRACKING NUMBER
10/20/99	000083 PA00749055	ILD984908202	D009	CF	2	P	72.0	501	0010090	WASTE MERCURY 8 UN2809 PG III CONTAINED IN MANUFACTURED ARTICLES (D009)(ERG#172 (CONTAINS C2500 MG/KG)(FL001965) ORG: 1 SRC: A58 FRM: B319 Q/F SYS: / IL M/W CD: /	PA	097857086

05/12/00 FRI 14:24 [TX/RX NO 5237] 002

GENERATOR: NYD982188427 REXAM/DSI BRIDGE ST BROWNVILLE NY 13615
NYD982188427

FACILITY NAME/ADDRESS	SK ID/FED EPA ID/STATE EPA ID			
FACILITY =	D009	P	72.0	0010090 WASTE MERCURY 8 UN2809 PG III CONTAINED
			72.0	
GENERATOR =	D039	P	596.3	0000717 WASTE COMBUSTIBLE LIQUID, N.O.S.
	D009	P	72.0	0010090 WASTE MERCURY 8 UN2809 PG III CONTAINED
			668.3	
GRAND TOTAL=	D039	P	596.3	0000717 WASTE COMBUSTIBLE LIQUID, N.O.S.
	D009	P	72.0	0010090 WASTE MERCURY 8 UN2809 PG III CONTAINED
			668.3	

05/12/00 FRI 14:24 [TX/RX NO 5237] 003

I

K52308-R3076 SEL ID: KH2

SAFETY-KLEEN SYSTEMS, INC.

DATE: 05/12/00 PAGE: 1

PRINT LOC: 218701

FROM: 01/01/99
THRU: 12/31/99

GENERATOR WASTE REPORT

CUST: 0000849039

NOT TO BE USED AS SOLE SOURCE FOR REPORTING PURPOSES

REQ BY: BRN3R03 HOTALING, MA

GENERATOR: 0000849039 DECORATIVE SPECIALTIES BRIDGE ST BROWNVILLE NY 13615

FACILITY NAME/ADDRESS SK ID/FED EPA ID/STATE EPA ID

SAFETY-KLEEN SYSTEMS, INC. 2-187-01
6741 VIP PARKWAY NYD982743312

SYRACUSE NY 13211

oil account
unit of measure is gallons

SVC DATE	SVC DOC / MANIFEST DOC	TRANSPRTR ID	WSTE CDS	CNT TYP	#OF CNT	U M	QUANTITY	HDL CD	SK-DOT	WASTE DESCRIPTION	CD	TRACKING NUMBER
09/01/99	M00002	ILD984908202	NONE	TT	1	G	600.0		0000850	USED OIL (NOT USDOT HAZARDOUS MATERIAL)	NR	
										ORG: SRC: / FRM: G/F SYS: IL M/W CD: /		
	FACILITY =		NONE			G	600.0		0000850	USED OIL		
							600.0					
	GENERATOR =		NONE			G	600.0		0000850	USED OIL		
							600.0					
	GRAND TOTAL=		NONE			G	600.0		0000850	USED OIL		
							600.0					

** TOTAL PAGE.04 **

05/12/00 FRI 14:24 [TX/RX NO 5237] 004

Elgin, Illinois 60 '57
CUSTO J.

WE CARE

2-187-71-7691

DECORATIVE SPECIALTIES
3 BRIDGE ST.
BROWNVILLE, NY 13615

BILL TO

FOR SERVICE CALL	BRANCH MANAGER	DOC. EXP.	SCHEDULED SERVICE WEEK	SCHEDULED TERRITORY	REFERENCE NUMBER
315 455-1426	GARY ROBINSON		99	1	M23921

CREDIT CODE	PREVIOUS BALANCE	BAL. OVER 60 DAYS

BUSINESS TYPE	CHAIN	OUTER COUNTY	SVC. P/C	PROD. P/C
9		YES	787	

LOCATION	TAX EXEMPTION NUMBER
218701	

ICE DATE	SALES REP NO.	CUSTOMER P.O. NUMBER	CUSTOMER PHONE #	TAX CODE	HANDLING CODE	ASSOC CODE	SERVICE TAX	C.O.M.S. TAX	PRODUCT TAX
-99	5831		782-5700						

ERVICE/ RODUCT	UNIT PRICE	QUANTITY	CHARGE	SALES TAX	TOTAL CHARGE	CHLORINE TEST RESULTS: HALOGEN TESTER PASS	HALOGEN TESTER FAIL	CHLOR-D-TECT RESULTS (PPM)	CHLOR-D-TECT TESTERS INITIALS	SK DOT NUMBER	CC	SERVICE TERM	CHANGE SERVICE TERM (WEEKS)(INITIAL)	CHANGE SCH. DATE (YY WW)	PROMO NO.	RELEASE NO.
661		600	367.20	25.70	392.90	☐	☐	<100	RB	850						
						☐	☐									
						☐	☐									
						☐	☐									
						☐	☐									
						☐	☐									
						☐	☐									
						☐	☐									
						☐	☐									

TAL-SERVICE/PRODUCTS 392.90

TANK CAPACITY

GENERATOR STATUS: CHECK ONLY ONE BOX BELOW

NERATOR: DOUS WASTE SIFICATION *	VEHICLE FLUIDS ONLY	OTHER NON-VEHICLE FLUIDS
ESQG	☐ 1	☐ 3
QG/LQG	☑ 2	☐ 4

1 NO PREQUAL REQUIRED, NO HALOGEN TEST
2 NO PREQUAL REQUIRED, HALOGEN TEST AT PICK-UP
3 PREQUAL REQUIRED, NO HALOGEN TEST
4 PREQUAL REQUIRED, HALOGEN TEST AT PICK-UP
* REFER TO REVERSE SIDE FOR DEFINITIONS

MANIFEST NO.	USEPA TRANSPORTER ID NO.
	ILD984908202
GENERATOR USEPA ID NO.	GENERATOR STATE ID NO.

TRANSPORTER
PRINT NAME: R. BAUMTP
DATE: 8/1/99
X SIGNATURE

FACILITY
PRINT NAME
DATE / /
X SIGNATURE

S DOT DESCRIPTION (INCLUDING PROPER SHIPPING NAME, HAZARD CLASS, AND ID.)	12. CONTAINERS NO.	TYPE	13. TOTAL QUANTITY	14. UNIT WT/VOL	SK DOT NUMBER
) OIL (NOT USDOT HAZARDOUS MATERIAL)	601	TT	600	G	850
) OIL AND WATER MIXTURE (NOT USDOT HAZARDOUS MATERIAL)					927
) ANTIFREEZE (NOT USEPA OR USDOT REGULATED)					1176

MEDIATE FACILITY NAME AND ADDRESS SAFETY-KLEEN SYSTEMS. INC.
6741 VIP PARKWAY, SYRACUSE NY 13211

USA EPA ID NO. NYD982743312
STATE ID NO.

WE CARE

OIL RECOVERY SERVICE/ SALES ACKNOWLEDGMENT

PART NO. 1353 (11/96)

SECTION	CASH ☐ / CHECK NUMBER	TOTAL RECEIVED	APPLY PAYMENT TO: ☐ TODAY'S SERVICE/SALE ☐ PREVIOUS BALANCE AS FOLLOWS

INVOICE #	AMOUNT $	INVOICE #	AMOUNT $

CREDIT CARD NO. AMEX VISA MC EXP. DATE

R REFERENCE

OIL CERT EXP

AF CERT EXP

MANIFEST CODE	SEQ #
	4 D

IN THE EVENT OF AN EMERGENCY CALL

CHARGE MY ACCOUNT FOR THIS TRANSACTION UNLESS OTHERWISE INDICATED IN THE PAYMENT RECEIVED SECTION.

Customer certifies that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the U.S. Environmental Protection Agency and the U.S. Department of Transportation.

ADDITIONAL TERMS AND CONDITIONS ON THE REVERSE SIDE OF THIS DOCUMENT ARE INCORPORATED HEREWITH MADE A PART HEREOF.

Print Name ROSWELL R. SEGOVIS

X
GENERATOR/SHIPPER DESIGNATED REPRESENTATIVE SIGNATURE

TOTAL DUE 392.90

DO NOT WRITE IN THE AREA BELOW

M23921

005831

BOX 1800
ELGIN, IL 60121-7857
DUNS. No. 05106-0405
FED. ID NO. 36-6090018

Safety-Kleen®

ORIGINAL INVOICE

To: Karen Matt 1page

LOCATION #	CUSTOMER ORDER NO		
2-187-71	S52245		
TAX STATUS/NUMBER	SERVICE DATE	INVOICE DATE	
	10-29-98	10-30-98	

BILL TO

DECORATIVE SPECIALTIES
BRIDGE ST
BROWNVILLE, NY 13615

SERVICE ADDRESS

OK to Pay
Thanks Mary

0066661	USED	550	344.40	24.11	24.11	368.51
						368.51

Safety-Kleen
Mary, OK to pay?
Thanks Karen

DSI
TAX 21525
GR
WE CARE
NOV 13 1998

B# V#

PROCESSED FOR PAYMENT

FOR INFORMATION PLEASE CALL SK SERVICING LOCATION: (315)455-1426 SYRACUSE, NY

Safety-Kleen and Laidlaw Environmental Services have formed a new organization with a goal of continuing to provide value-added solutions to your business and environmental needs. Any changes occurring will be thoroughly evaluated to ensure they have only a positive impact on our customers. Payments should continue to be made to Safety-Kleen, and our remittance address remains the same.

PLEASE DO NOT USE ANY STAPLES WITH REMITTANCE

RETURN THIS PORTION WITH PAYMENT TO: P.O. BOX 1800 ELGIN IL 60121-7857

Safety-Kleen® BOX 1800 ELGIN, IL 60121

2-187-71-7691-3	094440	10-29-98	10-30-98	

094440 21877176913003685100241 1

DECORATIVE SPECIALTIES
BRIDGE ST
BROWNVILLE, NY 13615

AMOUNT DUE 368.51

BILL OF LADING/MANIFEST

1. Shipper's US EPA ID No. (If Applicable): NYD 982158422
Document No.: 36220
2. Page 1 of 1
90541

3. Shipper's Name and Mailing Address: REXAM DSI
BRIDGE ST
BROWNVILLE NY 11212

4. Shipper's Phone (315) 782-5800

5. Transporter 1 Company Name	6. US EPA ID Number	A. Transporter's Phone
SAFETY-KLEEN CORP.	ILD 984908202	315 455-1426
7. Transporter 2 Company Name	8. US EPA ID Number	B. Transporter's Phone
9. Designated Facility Name and Site Address: 000658 SAFETY-KLEEN CORP. 3700 LAGRANGE ROAD SMITHFIELD KY 40068	10. US EPA ID Number KYD 053348108	C. Facility's Phone 502 845-2453

	11. Shipping Name and Description	HM	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol
a.	WASTE OIL AND ABSORBANT MIXTURE (NOT USDOT HAZARDOUS MATERIAL)		008	DM	2744	P
b.						
c.						
d.						
e.						

15. Special Handling Instruction and Additional Information: WEST R/T# 92842533 2-187-01-9492
EMERGENCY RESP 800-468-1760(24 HR). IF UNDELIVERABLE RETURN TO GENERATOR.
SK CORP AUTHORIZED TO RETAIN LICENSED SUBSEQUENT CARRIERS AS NECESSARY.

SKDOT# A: 1758 B: C: D:

16a. US DOT HAZARDOUS MATERIALS SHIPPER'S CERTIFICATION: "This is to certify that the above-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."

Printed/Typed Name | Signature required here if US DOT regulated | Month Day Year

16b. NON-REGULATED SHIPPER'S CERTIFICATION: I certify the materials described above on this form are not subject to federal regulations for Transportation or Disposal.

Printed/Typed Name | Sign here if material is not DOT regulated | Month Day Year 01 06 97

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: KICH BERNARDIN | Signature | Month Day Year 01 06 97

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Month Day Year

19. Discrepancy Indication Space

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

Printed/Typed Name | Signature | Month Day Year

IN EVENT OF EMERGENCY CALL
1-800-468-1760 (24 hours)

GENERATOR'S COPY

FLUID RECOVERY SERVICE
IMAGING SERVICES / PLACEMENT FORM

Safety-Kleen

1000 North Randall Road
Elgin, Illinois 60123-7857

GENERATOR LOCATION

BRANCH 2-18701

DUNS NO. 05106-0408
FED. ID NO. 39-6090019

P 0108170

NAME: EXAM DSI

DELIVERY ADDRESS: Bridge Street

INFORMATION/ATTENTION LINE:

CITY & STATE: Bradenville NY

ZIP: 13615 TAX CODE:

GENERATOR USA EPA ID. NO.: + GENERATOR STATE ID. NO.: +

BILL TO (IF DIFFERENT FROM LOCATION)

NAME:

DELIVERY ADDRESS:

INFORMATION/ATTENTION LINE:

ZIP: TAX CODE:

EQUIPMENT PLACEMENT

DATE PLACED 10/24/96

SERVICE NO. / SERIAL NO.	SELECT ONE	CHARGE	TAX	TOTAL	TYPE OF OUTLET	SERVICE TERM	MSDS GIVEN	NEXT SERVICE	REMARKS
020 — 55577	☒	SPECIAL MARKETS							
020 — 88888	☐	CODE 09 INDUSTRIAL			09	4W		one time	
—							☐		
—							☐		
—							☐		
—							☐		
		TOTAL							

TYPE OF OUTLET

11 Dentists	16 Professional Imaging	21 Police/Gov't Offices/Schools
12 Hospitals/Clinics	17 Printing & Publishing	22 Industrial X-Ray
13 Prof. Diagnostic Imaging	18 Motion Picture/Television	23 Other
14 MiniLabs/MicroLab	19 Government Systems	
15 Lg. Photofinishers	20 Office Imaging	

SERVICE ESTIMATE

WASTE DESCRIPTION	S-K SURVEY NO.	CONTAINER SIZE	COST/CONTAINER
Oil/Dirt	1080151	55	$292.50

The Service Estimate on this Placement Form is based on the Customer's description of its waste materials. The estimate is not binding upon Safety-Kleen.

X _____
SAFETY-KLEEN REPRESENTATIVE'S SIGNATURE

PLACEMENT INFORMATION

DATE OF CONFIRMATION	SALES REP. NO.	SALES REP. NAME	BLITZ CODE	ASSOCIATION CODE	PROD. TAX %	CHAIN	SVC P/S	PROD P/S
10-24-96	0671	SPECK						

CUSTOMER'S P.O. NUMBER ☐ BLANKET ☐ TEMPORARY | SALES TAX EXEMPTION NO | GENERATOR/CUSTOMER TELEPHONE NUMBER AREA CODE 315 782 5800 | SPECIAL HANDLING | CREDIT CODE

PRODUCT SALES SECTION

PRODUCT NUMBER	DESCRIPTION	MSDS GIVEN	PRICE	UNIT OF MEASURE	QUANTITY DELIVERED	SALE AMOUNT	TAX	LINE TOTAL
82100	Lab Profile	☐	475.00	EA	1	475.00	38.25	513.25
		☐						
		☐						
		☐						
		☐						
		☐						

PAYMENT RECEIVED SECTION

CASH ☐ CHECK NUMBER | TOTAL RECEIVED | APPLY PAYMENT TO: ☐ TODAY'S SERVICE/SALE ☐ PREVIOUS BALANCE AS FOLLOWS

INV.# _____ AMOUNT $ _____

CREDIT CARD NO. _____ AMEX VISA MC EXP. DATE

CONSUMER REFERENCE INFORMATION

TOTAL PRODUCTS AMOUNTS

I HEREBY ACKNOWLEDGE PLACEMENT OF THE EQUIPMENT DESCRIBED ABOVE. CHARGE MY ACCOUNT FOR THIS TRANSACTION UNLESS OTHERWISE INDICATED IN THE PAYMENT RECEIVED SECTION. I HAVE REVIEWED AND AGREE TO THE ADDITIONAL TERMS AND CONDITIONS ON THE REVERSE SIDE.

TOTAL MACHINE SERVICE AMOUNT (INCLUDING TAX)

TOTAL DUE 513.25

X _____ Steven M. Lamer
CUSTOMER REPRESENTATIVE'S SIGNATURE — PRINT CUSTOMER REPRESENTATIVE'S NAME

SEE REVERSE SIDE FOR IMPORTANT INFORMATION

IN THE EVENT OF EMERGENCY CALL 1-708-888-4650 (24 HOURS)

PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION
Bureau of Land Recycling and Waste Management
P.O. Box 8550
Harrisburg, PA 17105-8550
OFFICIAL PENNSYLVANIA MANIFEST FORM

2-187-01

FM-LRWM0051 REV. 12/98

Form approved.
OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. NYD 982188427 | Manifest Document No. 89485 | 2. Page 1 of 1 | Information within the bold red border is not required by Federal law but may be required by State law.

3. Generator's Name and Mailing Address
XAM/DSI
RIDGE ST
BROWNVILLE NY 13615

4. Generator's Phone (315) 782-5800

A. State Manifest Document Number PAG 0940833

B. State Gen. ID

5. Transporter 1 Company Name: SAFETY-KLEEN SYSTEMS, INC | 6. US EPA ID Number: ILD 984909202

C. State Trans. ID 0 1 7 2
PA-AH

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

D. Transporter's Phone (315) 455-1426

E. State Trans. ID
PA-AH

9. Designated Facility Name and Site Address 050033
ADVANCED ENVIRON RECYCLIN
2591 MITCHELL AVE
ALLENTOWN PA 18103 | 10. US EPA ID Number: PAD 987367216

F. Transporter's Phone ( )

G. State Facility's ID

H. Facility's Phone (610) 797-7608

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
X WASTE MERCURY 8 UN2809 PG III CONTAINED IN MANUFACTURED ARTICLES (D009)(ERG#172) (CONTAINS <2500 MG/KG)(FLO01965)	03	CF	XXX124	P	D009

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above
a. S01 b. c. d.

Special Handling Instructions and Additional Information

0002 98272425 000128948S 0000101719 03

IF UNDELIVERABLE, RETURN TO GENERATOR. K)NY-R
EMERGENCY RESP#800-468-1760 24HR.

SK AUTHORIZED TO RETAIN THESE SUBSEQUENT CARRIERS: A 10090 B TSMT, C HZEG, D SHND, NAPT

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. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and 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	Month	Day	Year
Transporter 1 Acknowledgement of Receipt of Materials				
DAVID L. HAYES JR		01	24	00
Transporter 2 Acknowledgement of Receipt of Materials				
Printed/Typed Name	Signature	Month	Day	Year

Discrepancy Indication Space

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

Printed/Typed Name	Signature	Month	Day	Year

PAG 0940833

700-22 (Rev. 9/88) Previous editions are obsolete

APPENDIX 38

OSHA Inspection History

OSHA Inspection Summary - Brownville

DATE OF INSPECTION	VIOLATION	CITATION	FINE
4/2/92	*INADEQUATE STORE OF FLAMMABLE MATERIAL	29 CFR 1910.106(e)(2)(ii)(b)(2)	$910.00
	*NO WRITTEN PROCEDURE ON RESPIRATORS	29 CFR 1910.134(e)(3)	$910.00
	*NO EYEWASH ON COATER	29 CFR 1910.151©	$1,137.50
	*LACK OF FORMALDEHYDE TRAINING	29 CRF 1910.1048(ii)(1)	$1,137.50
9/30/80	*COATER PLATFORM MIXING AREA LACKED	29 CFR 1910.22(C)	$350.00
	TOP OPENING GUARD AND NO IDENTIFICATION		
	NUMBER ON KADY MILL STARCH TANK		
	*UNGUARDED HOLE IN 3RD FLOOR BASEMENT	29 CFR 1910.23(a)(8)	$0
	*FIRE EXTINGUISHER NOT EXAMINED/RECHARGED	29 CFR 1910.157(d)(3)(I)	$0
	*DRILL PRESS NOT SECURELY ANCHORED	29 CFR 1910.212(b)	$0
	*REEL SHAFTS NOT GUARDED	29 CFR 1910.261(k)(24)(iii)	$0
	*GROUND PRONG REMOVED FROM PLUG ON	29 CFR 1910.309(a)	$0
	PORTABLE GRINDER		
8/15/79	*ELECTRICAL SWITCH BOX NOT GUARDED AND	29 CFR 1910.309(a)	$160.00
	NO COVER		TOTAL
	*PORTABLE DOCKBOARD NOT PROPERLY	29 CFR 1910.30(a)(2)	
	SECURED		
	*NON-SAFETY CONTAINER FOR GASOLINE STORAGE	29 CFR 1910.106(d)(2)(I)	
5/19/77	*POINTS OF OPERATION OF MACHINERY NOT GUARDED	29 CFR 1910.212(a)(3)(ii)	$240.00
	*PLATFORMS NOT GUARDED BY RAILINGS	29 CFR 1910.23(C)(1)	$80.00
	*LP GAS CONTAINERS NO SECURELY MOUNTED	29 CFR 1910.110(e)(4)(iii)	$0
	*FIRE EXTINGUISHER OBSTRUCTED FROM VIEW	29 CFR 1910.157(a)(3)	$0
	*LIFT TRUCK DID NOT HAVE HORN	29 CFR 1910.178(p)(1)	$0
	*AIR COMPRESSOR DID NOT HAVE GUARD	29 CFR 1910.219(d)(1)	$0
	*OXYGEN AND ACETYLENE CYLINDERS STORED	29 CFR 1910.252(a)(2)(IV)(C)	$0
	TOGETHER		
1/27/76	*UNGUARDED SPROCKET SHEELS AND CHAINS	29 CFR 1910.219(f)(3)	$40.00
	*UNGUARDED SHAFTS	29 CFR 1910.219(C)(2)(I)	$40.00
	*OPEN JUNCTION BOX NO COVER	29 CFR 1910.309 (a)	$0
	*NO RAILINGS ON WALKWAY	29 CFR 1910.261(k)(4)	$35.00
	*UNGUARDED INRUNNING NIP POINTS	29 CFR 1910.219(e)(1)(I)	$40.00
	*UNGUARDED ROTATING MACHINE PARTS	29 CFR 1910.261(k)(2)(iii)	$35.00
	*NO SAFETY BELTS AND LIFE LINES FOR PULPERS	29 CFR 1910.261(j)(5)(ii)	$35.00
	*UNGUARDED PLATFORM	29 CFR 1910.23(C)(1)	$0
	*NO OVERHEAD GUARD FOR FORK TRUCK IN STORAGE	29 CFR 1910.178 (e)(1)	$35.00
	AREA IN FINISHING ROOM		
	*PERMANENT AISLES AND PASSAGEWAYS UNMARKED	29 CFR 1910.22(b)(2)	$0
	*UNGUARDED SHAFT COUPLINGS	29 CFR 1910.219(I)(2)	$35.00
	*UNGUARDED VERTICAL BELT	29 CFR 1910.219(e)(3)(I)	$0
	*UNGUARDED STAIRWAY	29 CFR 1910.24(h)	$0
	*LACK OF DIRECTIONAL EXIT SIGNS	29 CFR 1910.37(q)(5)	$0
	*UNGUARDED POINT OF OPERATION ON LIFT TABLE	29 CFR 1910.212(a)(3)(ii)	$55
	AND PUSH ARM		

APPENDIX 39

1995 Petroleum Bulk Storage Inspection

New York State Department of Environmental Conservation
207 Genesee Street
Utica, New York 13501-2885
(315) 793-2554

Date: 2/22/95

39

Langdon Marsh
Commissioner

TIM SHEAR
DECORATIVE SPECIALTIES INTERNATIONAL, INC.
BRIDGE STREET
BROWNVILLE, NY 13615

RE: 6-009520
DECORATIVE SPECIALTIES INTERNATIONAL INC
BROWNVILLE, JEFFERSON COUNTY

Dear Tank Owner:

On 1/31/95, a Petroleum Bulk Storage inspection was performed at the above noted facility. A copy of the inspection report is attached. The report should be thoroughly reviewed with comments and/or recommendations being addressed.

The items marked with an "N" indicate violations of the regulations, which must be corrected. Please notify this office when the items are corrected so that a followup inspection can be performed.

If you have any questions, I can be reached at (315) 793-2554. Thank you for your cooperation and assistance in resolving this matter.

Sincerely,

Donald I. Johnson
Environmental Engineer 1
Region 6 - Utica

Enclosure

NYS DEPARTMENT OF ENVIRONMENTAL CONSERVATION
PETROLEUM BULK STORAGE INSPECTION FORM

Date 2/31/95 Inspector M e Ho

Facility Decorative Specialties International PBS 009520

Add/City Bridge St

Town/County Brownville / JEFFERSON Telephone 315/782-5800

Owner Same

Address

City _____ State ___ Zip 13615

Telephone ___/___-_____

612.2 Modification notification made - —

613.8 Spills reported - yes

Waste oil stored at facility - yes

Storage/disposal _____

Floor drains - yes Discharge - GW SW (SS) Unk Village Brownville

Sec Cont Discharge - NA GW SW (SS) - Plant treatment then to Village

Comments * 3K WAS CONVERTED FROM A FUEL OIL TANK TO A CLAY EMULSION TANK IN 10/88

* STRAIGHT DROP TO TANK FROM LABEL - REMOTE FILL

Contact person DAVE PAVALAS Title PLANT P.E

Signature _____

NYS DEPARTMENT OF ENVIRONMENTAL CONSERVATION
PETROLEUM BULK STORAGE INSPECTION FORM

Facility Decorative Specialties International Inc.

6NYCRR 612.2
(a) Registered 009520 (b) Transfered — (e) Posted yes

	Tank No.	FU2/AST	002/AST *		
	Size/Loc.	1850			
	Product	#6			
6NYCRR 613.3					
(b)	Color coding	yes			
(c)(1)	Impact valve				
(c)(2)	Shutoff valve for gravity dispenser	—			
(c)(3)	Gauge or high level alarm (AST)	yes			
(c)(3)	Label (AST)	yes			
(c)(4)	Check valve on fill	~~no~~ NA @ gravity as per Tim Shea 3/3/95			
(c)(5)	Operating valve	no * drop valve should be located @ Tank top			
(c)(6)	Secondary cont. adequate	yes			
6NYCRR 613.4					
Inventory records maintained		yes			
6NYCRR 613.5					
(a)	Tightness tests performed	—			
(b)	Cathodic protection monitored	—			
(b)	Leak detection performed	—			
(b)	Records maintained on site	—			
6NYCRR 613.6					
(a)	Monthly inspections performed	yes			
(b)	Ten year inspections performed	—			
(c)	Records maintained	yes			
6NYCRR 614					
New tank meets UST/AST req.		yes			
New piping meets req.		yes			

Date 1/31/95 page 2/2 Inspector Netto

PETROLEUM BULK STORAGE INSPECTION FORM

RECEIVED

Date 10/17/90 OCT 19 1990 Inspector K. Netto

NYS DEC REGION

Facility James River Corp. / Premoid Division

Add/City Bridge St. Brownville

Town Brownville Telephone 315/782 - 5800

Owner James River Corp. / Premoid Division

Address Bridge St.

City Brownville State NY zip 13615

Telephone 315/782-5800

	Yes	No	NA
Is facility registered? PBS NO. 009520	☒	☐	☐
Is registration certificate posted?	☒	☐	
613.4 Inventory records kept?	☒	☐	☐
614.5 Underground tanks tested as required?	☐	☐	☒
613.6 Aboveground inspections performed?	☒	☐	☐
Registration data conform to site inspection?	☒	☐	
Waste oil stored at facility? Storage/disposal 55 gal. drums disposal unknown.	☒	☐	
Floor drains? Discharge - GW SW SS Unk Treatment - oil trap treatment at Brownville Sewage Plant	☒	☐	☐

Comments 1 - 18,500 installed 1/76 aboveground. 1 - 3000 installed 1/77 is now used for clay slurry mix. Application # 147907 sent to Utica for Modification 12/2/88

Contact person Sandy Mercuri Title Technical Supt.

Form received by Sandra A. Mercuri

APPENDIX 40

Site Safety Manual

REXAM DSI

Safety Policy Statement

- The Safety And Health of DSI People Has The Highest Priority In All That We Do.

- It Is, Therefore, The Policy Of Rexam DSI To Provide All Employees With A Safe And Healthy Work Environment. Accidents Threaten Our Assets By Injuring People And Damaging Property, Thereby Reducing Both The Moral And Economic Health Of the Business

- Safety Is A Moral And Professional Obligation Of Every DSI Employee.

- We Consider No Phase Of Our Operation As Being Of Greater Importance Than Accident Prevention. It Is Expected That All Employees Have An Attitude Of Safety Prevention And Follow Necessary Procedures To Maintain A Safe Working Environment. All Personnel Will Be Evaluated With Respect To Their Safety Performance.

- The Responsibility For Obtaining A Safe And Healthful Working Environment And Having In Place A Comprehensive Loss Control Process Rests With Management. The Development And Implementation Of Safety Programs, Therefore, Has Management's Highest Concern And Support.

REXAM DSI

Safety Philosophy

- Safety Is The Most Essential Part Of Any Job Or Activity Performed At DSI. Management Considers No Job Successfully Completed If Performed In An Unsafe Manner, Whether At Work Or Home.

- It Is, Therefore, The Policy Of This Company To Provide And Maintain A Safe And Healthful Working Environment, And To Follow All Safe Working Practices. It Is Every Employee's Responsibility To Work In A Safe Manner And To Report Any Known Safety Hazards Or Injuries To Their Supervisor Immediately. Supervisors Are Responsible And Will Be Held Accountable Not Only For Their Own Safety, But Also For The Safety And Well-Being Of Those Employees Reporting To Them. It Is The Intention Of Management To Comply And Expect All Employees To Comply With Local, State And Federal Safety And Health Regulations. Any Willful Violation Of Any Established Safety Procedure Or Practice Will Be Reviewed For Disciplinary Action. All Employees Will Also Be Held Accountable For Careless Acts Committed By Themselves.

- A Consistent And Successful Safety Program Requires The Full Cooperation, Support And Understanding Of Everyone At DSI. We Are Firmly Committed To The Belief That All Accidents Can Be Prevented. This Will Be Achieved Through Training, Proper Equipment Design And Procedures And, Most Of All, By Attentive And Constant Concern By Each Employee. Exercising Maximum Care And Good Judgment In Preventing Accidents To Themselves And Their Fellow Employees Is The Most Important Aspect Of Any Job.

The Safety and Health Manuals are located in the following areas:

Human Resource Office

Resident Manager's Office

Production Manager's Office

Plant Engineer's Office

Senior Process Engineer's Office

Foremen's Office

Maintenance Supervisor's Office

Paper Machine

Coater

REXAM

REXAM DSI SAFETY POLICY STATEMENT

The safety and health of DSI people has the highest priority in all that we do.

It is, therefore, the Policy of Rexam DSI to provide all employees with a safe and healthy work environment. Accidents threaten our assets by injuring people and damaging property, thereby reducing both the moral and economic health of the business.

The responsibility for obtaining a safe and healthful working environment and having in place a comprehensive loss control process rests with management. The development and implementation of safety programs, therefore, has management's highest concern and support.

Safety is a moral and professional obligation of every DSI employee.

We consider no phase of our operation as being of greater importance than accident prevention. It is expected that all employees have an attitude of safety prevention and follow necessary procedures to maintain a safe working environment. All personnel will be evaluated with respect to their safety performance.

KW/dm
11/98

REXAM

REXAM DSI
SAFETY PHILOSOPHY

Safety is the most essential part of any job or activity performed at DSI. Management considers no job successfully completed if performed in an unsafe manner, whether at work or home.

It is, therefore, the policy of this company to provide and maintain a safe and healthful working environment, and to follow all safe working practices. It is every employee's responsibility to work in a safe manner and to report any known safety hazards or injuries to their supervisor immediately. Supervisors are responsible and will be held accountable not only for their own safety, but also for the safety and well-being of those employees reporting to them. It is the intention of management to comply and expect all employees to comply with local, state and federal safety and health regulations. Any willful violation of any established safety procedure or practice will be reviewed for disciplinary action. All employees will also be held accountable for careless acts committed by themselves.

A consistent and successful safety program requires the full cooperation, support and understanding of everyone at DSI. We are firmly committed to the belief that all accidents can be prevented. This will be achieved through training, proper equipment design and procedures and, most of all, by attentive and constant concern by each employee. Exercising maximum care and good judgement in preventing accidents to themselves and their fellow employees is the most important aspect of any job.

KW/dm
11/98

REXAM DSI
BROWNVILLE, NEW YORK

COMPREHENSIVE SAFETY AND HEALTH PLAN

THE REXAM DSI BROWNVILLE MILLSITE HAS A COMPREHENSIVE SAFETY AND HEALTH PROGRAM CONSISTING OF MANY ELEMENTS, IN ADDITION TO THE OSHA MANDATED PROGRAMS.

- A VERY STRONG MANAGEMENT COMMITMENT TO THE ESTABLISHMENT OF A SAFE AND HEALTHFUL WORK PLACE FOR EACH EMPLOYEE.

- EMPLOYEES HAVE SIGNED THE SAFETY PLEDGE.(ATTACHED)

- THE SAFETY COMMITTEE MEETS ON A MONTHLY BASIS AND IS CHAIRED BY A REPRESENTATIVE FROM ONE OF THE DEPARTMENTS.. THE COMMITTEE IS MADE UP OF MANAGEMENT PERSONNEL WITH EACH DEPARTMENT FROM THE FLOOR BEING REPRESENTED.

- TOOLBOX SAFETY MEETINGS ARE HELD ON A WEEKLY BASIS AND CONDUCTED BY THE SHIFT FOREMAN. TOPICS ARE CHOSEN BY A MEMBER OF THE SAFETY COMMITTEE ON A ROTATING SCHEDULE.

- MONTHLY MILL WIDE SAFETY INSPECTIONS ARE CONDUCTED BY A MEMBER OF THE SAFETY COMMITTEE WHO SELECTS SOMEONE FROM THE FLOOR TO ASSIST.

- EACH ACCIDENT AND NEAR MISS IS THOROUGHLY INVESTIGATED BY TWO MEMBERS OF THE SAFETY COMMITTEE WHO SERVE IN THIS CAPACITY FOR A PERIOD OF ONE MONTH.

- THE BROWNVILLE MILL HAS A SAFETY INCENTIVE PROGRAM DEVELOPED BY THE SAFETY COMMITTEE.(IN BOOK)

- THE RESULTS SHARING PROGRAM HAS AS A COMPONENT A SAFETY PROGRAM.(ATTACHED)

- THERE IS A SAFETY SHOE PROGRAM, NOISE PROTECTION PROGRAM AND SAFETY GLASS PROGRAM IN EFFECT WITH FINANCIAL INCENTIVES FROM REXAM DSI TOWARDS THESE PURCHASES.

- THE HARTFORD MAKES PERIODIC INSPECTIONS AND SITS IN ON AT LEAST ONE SAFETY MEETING PER YEAR.

- A CPR AND FIRST AID TRAINING COURSE IS OFFERED EACH YEAR AND CONDUCTED BY THE AMERICAN RED CROSS.

- NEW HIRES ARE THOROUGHLY TRAINED REGARDING SAFETY BEFORE THEY ARE ALLOWED TO BEGIN THEIR ACTUAL ASSIGNMENTS.

REXAM DSI
BROWNVILLE, NEW YORK

SAFETY AWARENESS PLEDGE

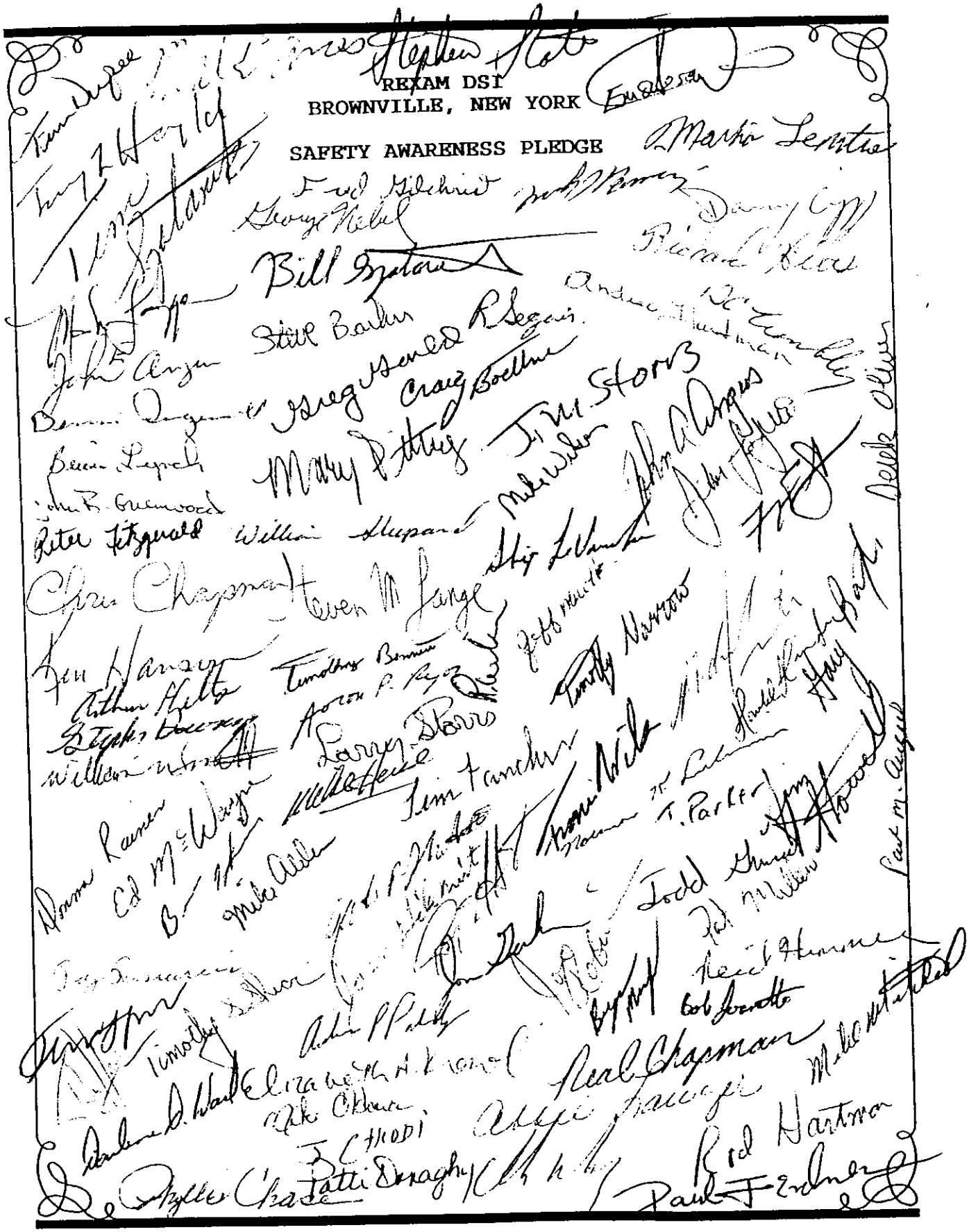
WE HAVE COMMITTED OURSELVES TO THE EXCELLENCE OF SAFETY BY MAKING IT JOB ONE.

EVERYONE WILL BE RESPONSIBLE TO MAKE SURE THAT THEY USE THEIR SAFETY EQUIPMENT AND WILL BE ACCOUNTABLE FOR THEIR ACTIONS.

BY MAKING SAFETY JOB ONE, WE CAN ACHIEVE ZERO INJURIES.

REXAM DSI
BROWNVILLE, NEW YORK

SAFETY AWARENESS PLEDGE



REXAM DSI
BROWNVILLE 2000 SAFETY INCENTIVE PLAN

OBJECTIVES:

1. CREATE AN "INJURY FREE" WORK ENVIRONMENT.
2. INCREASE INDIVIDUAL AWARENESS AND SKILLS THROUGH TRAINING.
3. REDUCE POTENTIAL FOR ACCIDENTS BY IMPROVING OUR HAZARDOUS SYSTEMS.

2000 SAFETY INCENTIVE PLAN BASED ON SAFETY TRAINING AND SAFETY RECORD.

PLAN: A SAFETY INCENTIVE AWARD SELECTED BY A MEMBER OF THE SAFETY COMMITTEE WILL BE GIVEN MONTHLY TO EACH EMPLOYEE WHO MEETS THE FOLLOWING CRITERIA:

1. IF AN EMPLOYEE MISSES A TOOLBOX MEETING AND DOESN'T MAKE IT UP, HE WILL BE INELIGIBLE FOR THE SAFETY INCENTIVE AWARD FOR THAT MONTH.

2. NO SAFETY INCENTIVE AWARD WILL BE GIVEN OUT FOR ANY MONTH THAT HAS A RECORDABLE ACCIDENT.

WEEKLY TOOK BOX MEETING:
(MINIMUM ONE MEETING PER MONTH AS A TEAM)

EACH EMPLOYEE IS RESPONSIBLE TO LEARN FROM THE MATERIAL AND MAKE UP ANY MISSED MEETINGS.

FOREMEN ARE RESPONSIBLE THAT MEETINGS ARE CONDUCTED AND/OR TRAINING MATERIALS ARE GIVEN OUT. THEY ARE RESPONSIBLE IN AIDING EMPLOYEES WITH ANY QUESTIONS.

SAFETY COMMITTEE IS RESPONSIBLE TO DEVELOP TRAINING MATERIALS FOR THESE MEETINGS. MEMBERS WILL GIVE TRAINING ON SOME OSHA SPECIFIC TOPICS.

REXAM DSI

SAFETY POLICY STATEMENT

THE SAFETY AND HEALTH OF DSI PEOPLE HAS THE HIGHEST PRIORITY IN ALL THAT WE DO.

IT IS, THEREFORE, THE POLICY OF REXAM DSI TO PROVIDE ALL EMPLOYEES WITH A SAFE AND HEALTHY WORK ENVIRONMENT. ACCIDENTS THREATEN OUR ASSETS BY INJURING PEOPLE AND DAMAGING PROPERTY, THEREBY REDUCING BOTH THE MORAL AND ECONOMIC HEALTH OF THE BUSINESS.

THE RESPONSIBILITY FOR OBTAINING A SAFE AND HEALTHFUL WORKING ENVIRONMENT AND HAVING IN PLACE A COMPREHENSIVE LOSS CONTROL PROCESS RESTS WITH MANAGEMENT. THE DEVELOPMENT AND IMPLEMENTATION OF SAFETY PROGRAMS, THEREFORE, HAS MANAGEMENT'S HIGHEST CONCERN AND SUPPORT.

SAFETY IS A MORAL AND PROFESSIONAL OBLIGATION OF EVERY DSI EMPLOYEE.

WE CONSIDER NO PHASE OF OUR OPERATION AS BEING OF GREATER IMPORTANCE THAN ACCIDENT PREVENTION. IT IS EXPECTED THAT ALL EMPLOYEES HAVE AN ATTITUDE OF SAFETY PREVENTION AND FOLLOW NECESSARY PROCEDURES TO MAINTAIN A SAFE WORKING ENVIRONMENT. ALL PERSONNEL WILL BE EVALUATED WITH RESPECT TO THEIR SAFETY PERFORMANCE.

GENERAL SAFETY RULES

IT IS THE RESPONSIBILITY OF EACH EMPLOYEE TO PRACTICE SAFE WORK HABITS AND TO CONTINUE TO WORK TO MAKE THE PLANT A SAFER PLACE IN WHICH TO WORK. ANY SET OF SAFETY RULES SHOULD NOT BE CONSIDERED ALL INCLUSIVE. GOOD JUDGEMENT SHOULD ALWAYS BE APPLIED IN ALL MATTERS CONCERNING SAFETY. RECOGNIZING THAT A LARGE PERCENTAGE OF INDUSTRIAL ACCIDENTS ARE DUE TO UNSAFE ACTS, SAFETY AWARENESS MUST BE MAINTAINED AT ALL TIMES. ADDITIONAL SAFETY RULES MAY BE ADDED AS NECESSARY. SAFETY RULES APPLYING TO A SPECIFIC OPERATING AREA WILL BE SET UP AND POSTED IN THAT OPERATING AREA WHEN APPROPRIATE.

INDIVIDUALS FAILING TO OBSERVE SAFETY RULES AND SAFETY IN GENERAL WILL BE SUBJECT TO DISCIPLINARY ACTION.

EVERY EMPLOYEE HAS THE RESPONSIBILITY TO CORRECT ANYONE ON UNSAFE PRACTICES.

REVISED: 02/17/99

GENERAL SAFETY RULES

1. ANY UNSAFE CONDITIONS AROUND MACHINERY OR COMPANY BUILDINGS SHOULD BE REPORTED TO YOUR FOREMAN OR SUPERVISOR IMMEDIATELY. IF YOU ARE ABLE TO CORRECT THIS CONDITION, DO SO AND REPORT IT TO YOUR SUPERVISOR.

2. ANY INJURY, NO MATTER HOW SLIGHT, MUST BE REPORTED IMMEDIATELY TO YOUR SUPERVISOR.

3. GOOD HOUSEKEEPING AND SAFETY GO HAND IN HAND. CONSEQUENTLY, ALL FLOORS AND OPERATING AREAS MUST BE KEPT AS CLEAN AS POSSIBLE OF DEBRIS, OIL, CHEMICALS AND PAPERS.

4. PROPER AND SAFE OPERATING PROCEDURES MUST BE FOLLOWED. NEVER ATTEMPT TO OPERATE MACHINERY WITH WHICH YOU ARE NOT FAMILIAR. REQUEST FULL INSTRUCTIONS FROM YOUR FOREMAN.

5. NO HORSEPLAY OR UNNECESSARY RUNNING IN THE PLANT.

6. SMOKING IS ALLOWED ONLY IN DESIGNATED AREAS.

7. THE COMPANY WILL SUPPLY PROPER SAFETY APPAREL AND EQUIPMENT. THIS PPE MUST BE WORN.

   A. SAFETY GOGGLES, FACE SHIELDS, GLOVES AND OTHER PROVIDED SAFETY APPAREL WILL BE WORN WHEN WORKING WITH CHEMICALS.

   B. WHEN CUTTING BANDING WIRE, GLOVES, SAFETY GLASSES AND A FACE SHIELD MUST BE WORN.

   C. ANYONE WORKING IN AN AREA WHERE OBJECTS MAY FALL FROM ABOVE WILL WEAR A SAFETY HELMET.

   D. SAFETY SHOES MUST BE WORN BY ALL EMPLOYEES PERFORMING PRODUCTION OR MAINTENANCE DUTIES.

   E. LOOSE FITTING CLOTHING IS NOT PERMITTED AROUND MOVING MACHINERY. NECKTIES AND NECKLACES ARE NOT ALLOWED ON THE OPERATING FLOOR.

   F. THE WEARING OF WATCHES AND RINGS IS DISCOURAGED AROUND MOVING EQUIPMENT.

   G. PROPER HEARING PROTECTION MUST BE WORN AT ALL TIMES IN THE MILL.

   H. CUT RESISTANT GLOVES MUST BE WORN WHEN SETTING SLITTERS AND REMOVING BACKING ROLL DOCTOR BLADES.

8. LIFT TRUCKS MUST BE DRIVEN WITH CAUTION. RECKLESS DRIVING IS NOT PERMITTED.

A. ANYONE THAT IS REQUIRED TO DRIVE CLAMP OR FORK TRUCKS MUST COMPLETE REXAM DSI's REQUIRED SAFETY TRAINING PROGRAM.

B. CLAMPS ON CLAMP TRUCKS SHOULD BE LOWERED TO THE GROUND AND CLOSED WHEN NOT IN OPERATION.

C. NO RIDERS ON FORKLIFTS OR LOADS.

D. LIFT TRUCKS WITHOUT LOADS SHOULD NOT BE DRIVEN WITH FORKS RAISED MORE THAN TWO TO FOUR INCHES OFF THE GROUND.

E. NEVER LEAVE FORKS RAISED WHEN TRUCK IS NOT IN USE.

F. SOUND HORN WHEN APPROACHING DOORWAYS, CURVES AND CORNERS.

G. LIFT TRUCK MUST BE OPERATED AT SAFE SPEED AT ALL TIMES.

H. DO NOT LIFT WEIGHTS ON FORK TRUCKS IN EXCESS OF RATED LOAD.

I. CLAMP TRUCKS ARE TO BE STOPPED WHEN TURNING ROLLS.

J. NO ONE IS TO WALK IN FRONT OF ROLLS BEING TURNED.

K. LIFT TRUCKS SHOULD BE CHECKED EACH SHIFT TO INSURE PROPER OPERATION. (KEEP LOOSE PAPER AWAY FROM ENGINE.)

L. NO SMOKING ON LIFT TRUCKS.

M. LIFT TRUCK OPERATORS AND PEDESTRIANS ARE EQUALLY OBLIGATED TO LOOK OUT FOR ONE ANOTHER. NO ONE IS GRANTED THE RIGHT OF WAY.

N. LIFT TRUCK OPERATORS MUST MAINTAIN TOTAL CONTROL OF THEIR VEHICLES AT ALL TIMES TO AVOID COLLISIONS AND TOPPLED LOADS.

O. LIFT TRUCK OPERATORS MUST ALWAYS SOUND THEIR HORN WELL BEFORE ROUNDING CORNERS OR PASSING THROUGH DOORWAYS.

P. WHEN DRIVING UP OR DOWN A RAMP, LOADS MUST BE SITUATED UPHILL IN RELATION TO THE LIFT TRUCK. IN OTHER WORDS, LOADED LIFT TRUCKS MUST BACK DOWN RAMPS AND TRAVEL FORWARD WHEN GOING UP. WHEN DRIVING UP A RAMP, THE LOAD MUST NOT OBSTRUCT THE OPERATOR'S VISION.

Q. THE PARKING BRAKE MUST BE SET EACH TIME THE OPERATOR GETS OFF THE TRUCK.

R. SEAT BELTS ARE TO BE USED WHENEVER OPERATING A LIFT TRUCK, NO EXCEPTIONS.

9. EMPTY PROPANE GAS CONTAINERS ARE TO BE REMOVED AND STORED IN THE DESIGNATED AREA OUTSIDE THE PRODUCTION BUILDING. EMPTY AND FULL PROPANE CONTAINERS ARE TO BE TRANSPORTED BY USE OF A CART LOCATED NEAR THE ENTRANCE TO THE MILL BY THE OVERHEAD DOOR. LIFT TRUCKS ARE NOT TO BE USED FOR THIS PURPOSE.

10. AIR HOSES SHOULD BE USED WITH CAUTION. PROPER EYE PROTECTION IS REQUIRED WHEN OPERATING AN AIR HOSE. COMPRESSED AIR WILL NOT BE USED TO BLOW DUST FROM CLOTHING UNLESS IT HAS A PROPER BAFFLE ATTACHMENT.

11. ANYONE WORKING OR ENTERING A PIECE OF EQUIPMENT THAT COULD BE STARTED BY ANOTHER EMPLOYEE MUST LOCK OUT ALL ASSOCIATED MOTOR CONTROLLERS AND STORED ENERGY SOURCES IN ACCORDANCE WITH THE MILL'S LOCKOUT/TAGOUT POLICY.

12. WHEN AN EMPLOYEE'S HAIR IS OF SUCH LENGTH AS TO OBSCURE VISION, BECOME ENTANGLED IN MACHINERY OR ENTER A NIP POINT UNDER STATIC ELECTRICITY, A HAIR NET, CAP OR SUITABLE COVER WHICH FULLY ENCOMPASSES THE HAIR SHALL BE WORN. PONY TAILS SHOULD BE TUCKED INTO THE EMPLOYEES' CLOTHING.

13. READ LABELS ON ALL INCOMING SHIPMENTS FOR PROPER PROCEDURES FOR HANDLING.

14. HORSE PLAY IS NOT PERMITTED.

15. NO EXCESSIVE NOISE OR YELLING IN THE MILL.

16. NO SLAMMING DOCTOR BLADES ON DRYERS.

17. ANYONE DRIVING OR RIDING THE PICKUP TRUCK OR FLATBED TRUCK MUST BE WEARING A SEAT BELT AT ALL TIMES.

18. ANYONE DRIVING MILL VEHICLES MUST HAVE PROPER LICENSE.

19. CUT RESISTANT GLOVES MUST BE WORN WHEN SETTING SLITTERS AND REMOVING BACKROLL DOCTOR BLADE.

20. HAND SAFETY.

    A. WHILE IT IS RECOGNIZED THAT UTILITY KNIVES ARE USEFUL AND SOMETIMES NECESSARY TOOLS, THEIR USE IS GENERALLY DISCOURAGED. ROLL SKINNERS SHOULD BE USED WHENEVER POSSIBLE FOR TRIMMING ROLLS, CUTTING SAMPLES AND REMOVING PAPER FROM CORES.

    B. WHEN A UTILITY OR RAZOR KNIFE MUST BE USED, A CUT RESISTANT GLOVE MUST BE WORN ON THE OPPOSITE (FREE) HAND.

    C. CUT RESISTANT GLOVES MUST BE WORN ON <u>BOTH</u> HANDS WHEN HANDLING DOCTOR BLADES, CHANGING SLITTERS OR HANDLING ANY OTHER SHARP OBJECT.

21. SAFETY GLASSES.

A. SAFETY GLASSES WITH SIDE SHIELDS ARE REQUIRED IN ALL AREAS OF THE MILL EXCEPT FOR THE PAPER TESTING LAB, CONFERENCE ROOM AND MILL OFFICES.

B. SAFETY GLASSES MUST BE EQUIPPED WITH THE MANUFACTURER RECOMMENDED SIDE SHIELDS. HOMEMADE OR MODIFIED SIDE SHIELDS MUST NOT BE USED. IN THE EVENT SIDE SHIELDS BECOME BROKEN OR OBSTRUCTED, THE COMPANY WILL REPLACE THEM.

22. LOCKOUT/TAGOUT AND CONFINED SPACE.

SPECIFIC LOCK-OUT/TAG-OUT (LOTO) AND CONFINED SPACE ENTRY PROCEDURES HAVE BEEN DEVELOPED TO PROTECT THE SAFETY OF ALL EMPLOYEES. THESE POLICIES CAN BE FOUND IN THE PLANT HEALTH AND SAFETY HANDBOOK. ALL EMPLOYEES ARE RESPONSIBLE FOR KNOWING THESE PROCEDURES AND APPLYING THEM WITHOUT EXCEPTION. FURTHER, ALL EMPLOYEES ARE RESPONSIBLE FOR ASSURING THE PROPER APPLICATION OF THESE POLICIES BY THEIR COWORKERS. FAILURE TO COMPLY WITH LOTO AND CONFINED SPACE POLICIES WILL BE CONSIDERED GROUNDS FOR DISMISSAL.

23. EMPLOYEES MUST NOT LIFT MORE THAN 50 POUNDS WITHOUT ASSISTANCE.

24. A FULL FACE SHIELD AND SAFETY GLASSES OR GOGGLES MUST BE WORN WHEN USING HIGH PRESSURE CLEANING EQUIPMENT.

IN ADDITION TO THE GENERAL SAFETY RULES, THE FOLLOWING RULES FOR EACH WORK STATION MUST BE FOLLOWED:

SHIPPING AND RECEIVING AND WAREHOUSE

1. PASSAGEWAYS AND AISLES MUST BE KEPT CLEAR AT ALL TIMES.

2. MATERIALS MUST BE STORED NEATLY AND SAFELY PILED.

3. FIRE EXTINGUISHERS AND SPRINKLER HEADS MUST NOT BE BLOCKED. FIRE DOORS SHOULD NOT BE BLOCKED.

4. ALL MATERIALS STORED IN TIERS WILL BE STACKED SECURELY TO PREVENT SLIDING, FALLING OR COLLAPSING.

5. TRUCKS MUST BE CHOCKED WHEN UNLOADING AND LOADING.

6. IN SEVERE COLD WEATHER IT IS PERMISSIBLE TO WEAR LINED BOOTS AT THE EDMUND STREET WAREHOUSE.

INDIVIDUALS FAILING TO OBSERVE THESE SAFETY RULES AND SAFETY IN GENERAL WILL BE SUBJECT TO DISCIPLINARY ACTION.

MACHINE ROOM

1. KEEP HANDS AWAY FROM OPEN NIPS.

2. NO SMOKING WHEN HANDLING BROKE.

3. BE SURE THE FLOOR AND GENERAL AREA ARE FREE OF MATERIAL TO ALLOW FREE MOVEMENT.

4. WHEN THREADING THE CALENDER STACK, THE DOCTOR BLADES MUST BE LOCKED IN PLACE.

5. WHEN CLEANING THE CALENDER STACK, ALWAYS CLEAN FROM UNDER THE DOCTOR BLADES.

6. WHEN THREADING THE REEL, THE SPOOL MUST ALWAYS BE DOWN. TWO EMPLOYEES ARE REQUIRED WHEN THREADING THE REEL.

7. DO NOT USE RAGS FOR CLEANING CALENDER STACKS. DO NOT CLEAN AT INGOING CALENDER NIPS.

8. SHAFTING UP MUST BE DONE BY TWO PEOPLE.

9. CUT RESISTANT GLOVES MUST BE WORN WHEN CHANGING SLITTERS.

10. WHEN HANDLING ACIDS OR OTHER CORROSIVE MATERIALS, THE FOLLOWING PERSONAL PROTECTIVE EQUIPMENT MUST BE WORN.

    - SAFETY GLASSES OR GOGGLES.
    - FACE SHIELD.
    - RUBBER APRON OR RAIN SUIT.
    - NEOPRENE GLOVES.

11. DO NOT USE A TAPE MEASURE WHEN MEASURING ROLLS AT THE PAPER MACHINE REEL. A WOODEN RULE SHOULD BE USED FOR THIS PURPOSE.

INDIVIDUALS FAILING TO OBSERVE THESE SAFETY RULES AND SAFETY IN GENERAL WILL BE SUBJECT TO DISCIPLINARY ACTION.

COATER

1. KEEP HANDS AWAY FROM NIPS AT ALL TIMES.
2. WHEN WORKING OR WALKING UNDER COATER, WATCH FOR LOW OVERHANG.
3. COATING SPILLS MUST BE CLEANED UP IMMEDIATELY.
4. GATE TO KADY MILL MUST BE CLOSED AND LATCHED.
5. OVEN SAFETY BARS MUST BE INSTALLED ANYTIME THE OVEN IS OPENED FOR CLEANING AND REPAIR.
6. DO NOT USE RAGS FOR CLEANING CALENDER STACKS. DO NOT CLEAN AT INGOING CALENDER NIPS.
7. SHAFTING UP MUST BE DONE BY TWO PEOPLE.
8. LOAD CLAY ON PLATFORM USING BIG FORK TRUCK.
9. LOAD CLAY FROM OPEN SIDE OF GATE ONLY.
10. DO NOT STACK CLAY ON TOP OF EMPTY PALLETS.
11. CUT RESISTANT GLOVES MUST BE WORN WHEN CHANGING BACKING ROLL DOCTOR BLADE.
12. WHEN CHANGING AMMONIA TANK, IT IS RECOMMENDED THAT THE POWERED AIR PURIFYING RESPIRATOR (PAPR) BE WORN.
13. DUST MASKS MUST BE WORN WHEN DUMPING CLAY BAGS.
14. DO NOT USE A TAPE MEASURE WHEN MEASURING ROLLS AT THE COATER REEL. A WOODEN RULE SHOULD BE USED FOR THIS PURPOSE.
15. WHEN CLEANING AND WORKING AROUND 2ND COATING STATION, ROD MUST BE IN HOLDER.

INDIVIDUALS FAILING TO OBSERVE THESE SAFETY RULES AND SAFETY IN GENERAL WILL BE SUBJECT TO DISCIPLINARY ACTION.

MAINTENANCE

1. ELECTRICAL EQUIPMENT OR TOOLS MUST BE GROUNDED BEFORE WORKING WITH THEM.

2. ALL GUARDS MUST BE PUT BACK ON MACHINERY AFTER WORKING ON THE MACHINERY.

3. PROPER PROTECTIVE EQUIPMENT WILL BE WORN WHEN WELDING, SANDING, CUTTING METAL OR DOING OTHER JOBS OF THIS TYPE.

4. HARD HATS MUST BE WORN WHEN WORKING UNDER MACHINERY, LADDERS, SCAFFOLDING OR SIMILAR EQUIPMENT.

5. WOODEN EQUIPMENT SUCH AS WORK BENCHES, LADDERS AND CHAIRS MUST BE IN GOOD CONDITION AND NOT SPLINTERY OR UNSTABLE.

6. CONTAINERS MUST BE PROVIDED FOR THE COLLECTION OF WASTE, TRASH, OILY AND USED RAGS, ETC. CONTAINER USED FOR OILY, FLAMMABLE OR HAZARDOUS WASTES SHALL BE EQUIPPED WITH COVERS.

7. AREA SHOULD BE CLEANED AND PUT IN ORDER WHEN FINISHED WORKING ON EQUIPMENT.

8. ANY INDIVIDUAL WELDING OR CUTTING SHOULD HAVE A FIRE WATCH. SCREENS ARE TO BE USED FOR SHIELD WHEN WELDING OUTSIDE SHOP AREA ON MAIN FLOOR.

9. CHECK HARNESS STRAPS PRIOR TO USE.

10. ONLY PROPERLY DESIGNED STRAPS AND/OR SLINGS MAY BE USED FOR LIFTING OR MOVING HEAVY OBJECTS. ROPE SHOULD NEVER BE USED FOR THIS PURPOSE.

INDIVIDUALS FAILING TO OBSERVE THESE SAFETY RULES AND SAFETY IN GENERAL WILL BE SUBJECT TO DISCIPLINARY ACTION.

REWINDER AND ROLL WRAPPING

1. NO BLOCKING OF ACCESS TO ANY FIRE PREVENTION EQUIPMENT OR EXITS.
2. AISLES AND PASSAGE WAYS MUST BE KEPT CLEAR AT ALL TIMES.
3. PROPER LIFTING TECHNIQUES MUST BE USED AT ALL TIMES.
4. WORK AREA MUST BE KEPT FREE OF WASTE AND DEBRIS AT ALL TIMES.
5. HANDS MUST BE KEPT AWAY FROM NIPS AT ALL TIMES.
6. DO NOT LIFT WEIGHTS ON FORK TRUCKS IN EXCESS OF RATED LOAD.
7. LIFTING OF SHAFTS MUST BE DONE BY TWO PEOPLE.
8. PUTTING WRAPPER UP MUST BE DONE BY TWO PEOPLE.
9. HANDLE HOT GLUE GUN WITH CAUTION.
10. CUT RESISTANT GLOVES MUST BE WORN WHEN CHANGING SLITTERS.

INDIVIDUALS FAILING TO OBSERVE THESE SAFETY RULES AND SAFETY IN GENERAL WILL BE SUBJECT TO DISCIPLINARY ACTION.

LAB SAFETY RULES

1. CUTTING BOARD HANDLE MUST BE DOWN WHEN NOT IN USE.
2. WHEN LABELING CHEMICALS INCLUDE NAME OF CHEMICAL, PERSON MAKING SOLUTION AND DATE ON THE BOTTLE, NOT ON THE CAP.
3. USE CAUTION AROUND SOLUTIONS WITH ph GREATER THAN 8 OR LESS THAN 6, IE: NaOH, ACETIC ACID AND AMMONIA. WEAR PROPER PPE.
4. WHEN PLACING SAMPLES INTO TENSILE TESTER, HOLD SAMPLE BY THE WIDTH NOT AT THE ENDS SO YOU DON'T PINCH FINGERS IN THE JAWS OR GET MOISTURE/OILS FROM HANDS ON SAMPLE.
5. NEVER CUT TEAR SAMPLE WITH HANDS OR FINGERS IN FRONT OF THE KNIFE.
6. STORE ALL CHEMICALS IN SECURE AREAS TO GUARD AGAINST SPILLS AND FALLS.
7. CLEAN ALL SPILLS IMMEDIATELY.
8. BLUE DYE CONTAINS HEAVY METALS, AVOID CONTACT WITH SKIN. USE PLASTIC GLOVES.
9. USE TONGS WHEN REMOVING CRUCIBLES FROM THE MUFFLE FURNACE.
10. ALWAYS WASH HANDS AFTER TESTING SEWER SAMPLE.
11. USE SAFETY GLASSES AND LATEX GLOVES WHEN POURING POWER CLEANER AND WHEN CLEANING IGT INKING UNIT.

INDIVIDUALS FAILING TO OBSERVE THESE SAFETY RULES AND SAFETY IN GENERAL WILL BE SUBJECT TO DISCIPLINARY ACTION.

BOILER ROOM

1. VESSEL ENTRY PROCEDURES MUST BE FOLLOWED WHEN WORKING INSIDE BOILERS.

2. GLOVES AND LONG SLEEVE SHIRTS AND GLASSES MUST BE WORN WHEN WORKING ON OR AROUND STEAM PIPES, HEADERS, ETC.

3. CHECK HIGH AND LOW WATER SAFETY SHUT OFF ON BOILERS AT THE START OF EVERY SHIFT.

4. WHEN ENTERING ONE BOILER WHILE THE OTHER IS ON LINE, MAKE SURE BOTTOM BLOW DOWN VALVES ARE SHUT OFF AND LOCKED OUT. ALSO, ALL OTHER VALVES TO BOILER.

5. USE PROPER LIFTING TECHNIQUES WHEN HEAVY ITEMS ARE DELIVERED TO THE RECEIVING DEPARTMENT.

6. WHEN EXITING CATWALKS, COME DOWN LADDER BACKWARDS.

7. WHEN MAKING WINDS, WALK IN DESIGNATED WALKWAYS. DO NOT USE SHORT CUTS BETWEEN MOVING MACHINERY.

INDIVIDUALS FAILING TO OBSERVE THESE SAFETY RULES AND SAFETY IN GENERAL WILL BE SUBJECT TO DISCIPLINARY ACTION.

BEATER ROOM

1. DO NOT GO DOWN LADDER INTO PULPER UNLESS SOMEONE IS HOLDING THE LADDER AND THE PULPER MOTOR IS LOCKED OUT.

   FOLLOW PROPER VESSEL ENTRY PROCEDURES WHEN ENTERING PULPER OR CHEST.

2. BALES WILL NOT BE STACKED MORE THAN 6 HIGH.

3. ALL MATERIALS STORED IN TIERS WILL BE STACKED SECURELY TO PREVENT SLIDING, FALLING OR COLLAPSING.

4. DO NOT BLOCK ENTRANCE WAYS.

5. WHEN CUTTING BANDING WIRE, GLOVES, SAFETY GLASSES AND FACE SHIELD MUST BE WORN.

6. DUST MASKS MUST BE WORN WHEN DUMPING DE BAGS.

INDIVIDUALS FAILING TO OBSERVE THESE SAFETY RULES AND SAFETY IN GENERAL WILL BE SUBJECT TO DISCIPLINARY ACTION.

VESSEL ENTRY PROCEDURE GUIDELINES

ANY SPACE WHICH HAS LIMITED OPENINGS, A DEFICIENCY OF OXYGEN, CONTAINS OR PRODUCES DANGEROUS CONCENTRATIONS OF AIR CONTAMINANTS OR IS MORE THAN FOUR FEET IN DEPTH IS CONSIDERED A CONFINED SPACE AREA. COMMON CONFINED SPACES INCLUDE PULPERS, PULP CHESTS, VARIOUS STORAGE AND MIXING TANKS AND BOILERS.

1. PRIOR TO ENTRY, A WRITTEN ENTRY PERMIT (ATTACHED) MUST BE COMPLETED BY THE RESPONSIBLE SUPERVISOR. SIGNATURES ARE REQUIRED OF THOSE PERSONS ENTERING THE SPACE, THE RESPONSIBLE SUPERVISOR AND THE MANAGER OF ENVIRONMENTAL AFFAIRS. UPON COMPLETION OF WORK, THE PERMIT IS TO BE SENT TO THE MILL SAFETY OFFICER.

2. ALL SOLIDS, LIQUIDS AND VAPORS MUST BE REMOVED WHERE POSSIBLE. ALL PUMPS AND LINES LEADING TO THE SPACE MUST BE DISCONNECTED AND THE MILL LOCKOUT PROCEDURE SHALL BE FOLLOWED.

3. THE SPACE SHALL BE TESTED IMMEDIATELY PRIOR TO ENTRY BY A QUALIFIED PERSON FOR THE FOLLOWING:

   THE OXYGEN CONTENT MUST BE GREATER THAN 19.5%.
   THE LOWER EXPLOSIVE LIMIT (LEL) FOR COMBUSTIBLES MUST BE LESS THAN 1%.
   ALL TOXIC GASES MUST BE CONTROLLED WITHIN THEIR PRESCRIBED THRESHOLD LIMIT VALUE (TLV).

WHERE THE TESTS PROVE THE EXISTENCE OF A HAZARDOUS ATMOSPHERE, THE SPACE SHALL BE VENTILATED TO REDUCE TO A SAFE LEVEL THE HAZARDOUS SUBSTANCE OR A SELF CONTAINED BREATHING APPARATUS (SCBA) SHALL BE USED BY THOSE PEOPLE ENTERING THE SPACE.

5. IF A SCBA IS USED, THEN A LIFE LINE AND SAFETY HARNESS SHALL BE WORN BY ALL PEOPLE ENTERING THE SPACE UNLESS SAFETY HAZARDS ARE CREATED, AND SHALL BE TRAINED IN THE PROPER USE OF THE SCBA.

6. AN OBSERVER SHALL BE STATIONED OUTSIDE THE CONFINED SPACE TO PROVIDE ASSISTANCE AND SHALL HAVE A SCBA AVAILABLE. COMMUNICATION BETWEEN THE OBSERVER AND THOSE INSIDE THE SPACE SHALL BE MAINTAINED.

7. PROPER PERSONAL PROTECTION EQUIPMENT SHALL BE WORN AS FOUND TO BE NECESSARY AND SHALL BE APPROVED BY THE RESPONSIBLE SUPERVISOR.

8. INDIVIDUALS FAILING TO OBSERVE THESE PROCEDURES ARE SUBJECT TO DISCIPLINARY ACTION.

REXAM DSI
BROWNVILLE, NEW YORK

TANK ENTRY PERMIT

TANK TO BE ENTERED:_____

REASON FOR ENTRY:_____

DATE OF ENTRY:_____

TIME OF ENTRY: FROM:_____AM/PM TO:_____AM/PM

CONDITIONS REQUIRED PRIOR TO ENTRY - MARK WITH AN (X)

1) ALL FREE SOLIDS, LIQUIDS AND VAPORS REMOVED. ( )

2) ALL INCOMING PIPES BLANKED AND/OR DISCONNECTED. ( )

LIST:_____

3) NO NEARBY IGNITION SOURCES. (NO SMOKING, NO LIGHTERS) ( )

4) ELECTRICAL EQUIPMENT LOCKED OUT AND TAGGED ( )

LIST:_____

5) TANK IS CLEANED AND PURGED WITH FORCED AIR UNTIL:

A. REASONABLY ODOR FREE. ( )

B. OXYGEN LEVEL AT 19.5% OR ABOVE. RECORD LEVEL_____ ( )

6) TEMPERATURE INSIDE TANK. RECORD LEVEL_____ ( )

7) RESPIRATORY PROTECTIVE EQUIPMENT REQUIRED. ( )

EXPLAIN/LIST:_____

8) PERSONAL PROTECTIVE EQUIPMENT REQUIRED. ( )

EXPLAIN/LIST:_____

9) BUDDY PRESENT AT TANK. NAME_____ ( )

SIGNATURE OF PERSONS ENTERING TANK (INDICATES ALL ABOVE MARKED CONDITIONS ARE MET).

_____

AUTHORIZED BY (SUPERVISOR):_____

MANAGER OF ENVIRONMENTAL AFFAIRS:_____

DATE:_____

NOTE: NO TANK MAY BE ENTERED WITHOUT A PERMIT.
A COPY OF THE PERMIT TO BE FILED WITH MANAGER OF ENVIRONMENTAL AFFAIRS.
A NEW PERMIT IS REQUIRED FOR EACH WORK DAY.

PROCEDURE FOR MAN LEAVING MILL

1. IF A MAN WHO HAS FINISHED A JOB LEAVES THE MILL WITHOUT REMOVING HIS LOCK, THE DEPARTMENT SUPERVISOR WILL TAKE THE FOLLOWING STEPS IN ORDER SHOWN:

   STEP 1: DETERMINE WHETHER THE MAN WHOSE LOCK REMAINS ON THE EQUIPMENT HAS LEFT THE MILL. IF THE MAN HAS NOT LEFT THE MILL, HE WILL BE CALLED BACK TO COMPLETE THE JOB AND/OR REMOVE HIS LOCK.

   IF THE MAN HAS LEFT THE MILL, A REASONABLE ATTEMPT TO REACH HIM BY TELEPHONE WILL BE MADE TO VERIFY WHY THE LOCK WAS NOT REMOVED. IF THE EMPLOYEE IS REACHED, HE WILL BE REQUIRED TO RETURN TO THE MILL IMMEDIATELY AND REMOVE THE LOCK ON HIS OWN TIME.

IF THE EMPLOYEE CANNOT BE LOCATED, FOLLOW STEP 2:

   STEP 2: THE SUPERVISOR ON DUTY IS TO CALL THE SUPERINTENDENT OF THE EMPLOYEE'S DEPARTMENT. IF THE SUPERINTENDENT CANNOT BE LOCATED, CALL THE PLANT ENGINEER WHO WILL COME INTO THE MILL.

   THE SUPERINTENDENT, THE PLANT ENGINEER WILL NOTIFY THE MILL MANAGER AND MAY TAKE THE RESPONSIBILITY OF REMOVING THE LOCK PROVIDING THE FOLLOWING STEPS ARE TAKEN:

   1. CALL THE EMPLOYEE TO VERIFY THAT THE EMPLOYEE CANNOT BE REACHED.

   2. VERIFY BY PHONE OR IN PERSON THAT THE EMPLOYEE HAS LEFT THE MILL (AT LEAST TWO EMPLOYEES).

   3. DETERMINE THE REASON THAT THE EQUIPMENT WAS LOCKED OUT.

   4. CHECK THE EQUIPMENT AND/OR SYSTEM CAREFULLY AND THOROUGHLY.

   5. REMOVE LOCK FOR START-UP.

   6. ANY LOCKS REMOVED BY A SUPERINTENDENT OR PLANT ENGINEER WILL BE RETAINED AND SENT TO THE HUMAN RESOURCE DEPARTMENT WITH A BRIEF REPORT EXPLAINING WHY THE REMOVAL WAS NECESSARY, THE TIME REMOVED AND BY WHOM.

ELECTRICAL LOCKOUT PROCEDURE

IT IS THE RESPONSIBILITY AND ACCOUNTABILITY OF ALL MILL PERSONNEL TO LOCKOUT EQUIPMENT BEFORE SERVICING OR WORKING ON ANYTHING THAT MAY BECOME ENERGIZED TO INCLUDE BUT NOT LIMIT TO: ELECTRICAL, STEAM, AIR OR WATER SUPPLIED EQUIPMENT.

IF AN EMPLOYEE WORKS WITHIN THESE GUIDELINES, THE ACCOMPANYING ELECTRICIAN IS THEN RESPONSIBLE AND ACCOUNTABLE TO SEE THAT THESE GUIDELINES ARE FOLLOWED. HOWEVER, IF AN EMPLOYEE ON HIS OWN DEVIATED FROM THESE GUIDELINES AT ANY TIME, THEN HE AND ONLY HE IS RESPONSIBLE FOR HIS OWN SAFETY.

1. THE PADLOCKS THAT ARE TO BE USED WILL HAVE THE PERSONS NAME PERMANENTLY ENGRAVED ON LOCK OR METAL TAGS. IF LOCK IS NOT PREPARED LIKE THIS IT WILL NOT BE USED.

2. ALL EMPLOYEES WILL USE THEIR OWN LOCKS IN ALL SITUATIONS AND ARE NOT PERMITTED TO USE ANOTHER EMPLOYEES LOCK.

3. ALL PEOPLE INVOLVED IN THE LOCKOUT WILL VERIFY THE LOCKOUT BY TRYING THE START BUTTON AND OBSERVING THE EQUIPMENT BEFORE WORK- CAN COMMENCE.

4. IF AT ANY TIME THE ELECTRICIAN BELIEVES THE PROCEDURE HAS BECOME UNSAFE, HE HAS THE RIGHT TO REFUSE TO LOCK/UNLOCK THE EQUIPMENT.

5. IF A JOB EXTENDS OVER A CHANGE IN SHIFTS, THE MAN COMING ON THE JOB WILL EXCHANGE LOCKS WITH THE MAN LEAVING THE JOB.

6. WHEN A JOB IS COMPLETE, EACH INDIVIDUAL ALONG WITH THE ELECTRICIAN WILL RETRIEVE THEIR OWN LOCK. UNDER NO CIRCUMSTANCES ARE YOU TO REMOVE ANY LOCK OTHER THAN YOUR OWN.

NOTES:

1. PRIOR TO MAJOR EQUIPMENT SERVICING, MEETINGS WILL BE HELD TO REVIEW SAFETY PROCEDURES INVOLVED IN COMPLETING DOWN WORK.

2. IT IS THE RESPONSIBILITY OF THE MILL'S SUPERVISORS TO EDUCATE THEIR EMPLOYEES IN CORRECTLY FOLLOWING THE LOCKOUT PROCEDURE AND FOLLOWING UP ON ITS USE OR ABUSE.

DECORATIVE SPECIALTIES INTERNATIONAL, INC.
RECOMMENDED STRATEGY TO DEVELOPING AN ELECTRICAL SAFETY PROGRAM
AUGUST 22, 1992

SCOPE

The scope of this Electrical Safety Program (ESP) strategy is to provide DSI - Reading a methodology to improve its current electrical safety program. It is developed based on the regulatory requirements of OSHA's electrical safety standards found in 1910, Subpart S. It is also intended to provide information concerning how these requirements may impact lockout/tagout procedures.

STRATEGY

The following strategy is recommended to be performed in the order presented. In many cases, individual items may be performed concurrently.

1. ELECTRICAL INVENTORY

Itemize the types of electrical energies, equipment and related hazards involved. Due to the potential high detail of information that can be itemized, it is recommended that this be generalized based on electrical safety considerations. This information will be used later in the program development and training.

2. QUALIFIED VS. UNQUALIFIED

In the Maintenance Department, determine who is "qualified" and "unqualified" (see the attached definition of "qualified"). This needs to be done on a person-by-person basis. The regulation never discusses the term "Licensed Electrician", however a Licensed Electrician would be expected to be qualified in the majority of circumstances.

For the purposes of this determination, the list developed in item #1 needs to be used to evaluate each type of energy, equipment, and hazards involved against each qualified and unqualified person. This needs to be an objective determination, preferably based on documentation of training courses, experience, and knowledge. (Items 1 & 2 are necessary to define the scope of work performed at DSI and its applicability to the Safety-Related Work Practice Regulations).

3. TRAINING REQUIREMENTS

The next function to perform is related to the Training requirements of 1910.332. The requirements are broken down into training for qualified and unqualified individuals. A brief discussion of these requirements is as follows:

UNQUALIFIED TRAINING:

In summary, unqualified individuals need to be trained on the hazards of electricity and the various safe work practices that are to be used in their respective areas.

In addition to Maintenance personnel that are determined to be unqualified, other job classifications need to be included. The regulation 1910.332 includes, but is not limited to, Industrial Machine Operators, Blue Collar Supervisors and Material Handling Equipment Operators as job classes probably needing to be trained.

The amount of training required is determined by the risk to the employee.

Training an unqualified person does not make them a qualified person.

QUALIFIED TRAINING:

In addition to the training content presented to unqualified individuals, additional training is required for qualified individuals (or to document that it has already been performed).

In summary, the additional training needs to include:

- skills and techniques to distinguish live parts from other parts;
- skill and techniques to determine the nominal voltages of exposed live parts;
- the clearance distances and associated voltages with various live parts as covered in 1910.333(c).

WHAT TO DO:

A. The separation of qualified and unqualified Maintenance personnel was already performed in #3 above.

B. Next, additional unqualified employees need to be determined.

C. The actual content of the training program should include the hazards of electricity and the safe work practices (discussed later in this document) to be followed.

4. WORK PRACTICES

This section of the regulation (1910.333) allows the employer to either 1) deenergize and lockout/tagout, 2) deenergize and tagout with various requirements, or 3) work on equipment live if it is not feasible to deenergize. 1910.335 also applies, as it requires the use of protective equipment.

Only a qualified person can perform these required functions on electrical circuits and equipment (following safe work practices):

- After equipment is deenergized, a qualified person shall operate the equipment operating controls or otherwise verify that the equipment cannot be restarted.

- Before reenergizing equipment, a qualified person shall conduct tests and visual inspections, as necessary, to verify that all tools, electrical jumpers, shorts, grounds, and other such devices have been removed, so that the circuits and equipment can be safely energized.

- Only qualified persons may work on electric circuit parts or equipment that have not been deenergized.

- Work within 10 feet of overhead lines following safe work practices.

- Defeat an electrical safety interlock.

- Only qualified persons may perform testing work on electric circuits or equipment (from 1910.334).

The regulation has specific work practice requirements (although its up to the employer to actually define what they will be) for:

- Working on or near exposed deenergized parts, which includes the requirements for lockout/tagout, etc.;

- Working on or near exposed energized parts, which includes overhead lines, illumination, confined or enclosed work spaces, conductive materials and equipment, portable ladders, conductive apparel (jewelry, etc.), housekeeping duties, and interlocks;

WHAT TO DO:

A. Determine what of the above stated functions that can only be performed by qualified persons exist at DSI. For routine situations, such as lockout/tagout of electrical motors, consider training non-qualified employees to be qualified to perform these functions.

B. Develop work practice procedures that cover the defined areas. Begin with site-wide policies, such as what types of protective equipment qualified persons will wear, and what they will not be allowed to wear.

C. Determine if any electrical safety equipment is necessary to implement these procedures. Examples include insulated gloves, electrical test equipment, insulating devices for overhead lines, and portable illumination. Begin to procure any necessary equipment. (See #7 below, as it also has requirements for protective equipment).

5. **USE OF EQUIPMENT**

This section of the regulations (1910.334) concerns the use of various types of equipment, such as portable tools and overcurrent protection. Various requirements exist, with the following a summarization of them:

- Portable tools and their power cords need to be handled correctly.

- Portable cords need to be inspected before each use, or when they are moved with equipment.

- Equipment needs to be properly grounded.

- In conductive locations (such as wet locations), electrical equipment needs to be approved for its use.

- Connecting attachment plugs cannot be performed with wet hands.

- Only approved disconnecting devices may be used to open/close circuits.

- When a circuit protective device trips, the circuit cannot be manually reenergized until it is determined why it tripped.

- Overcurrent protection should not be modified.

- Test instruments need to be properly selected, inspected, and used only by qualified employees.

- When flammables are present only occasionally, precautions to prevent there ignition must be performed.

WHAT TO DO:

A. Additional procedures/polices need to be established concerning the above items. Many of these elements are already standard operating procedures for qualified employees. Written procedures and an effective mechanism for their full implementation and ongoing evaluation would document their ongoing effectiveness.

6. SAFEGUARDS FOR PERSONNEL PROTECTION

This section, 1910.335, covers the used or appropriate personal protective equipment, protective tools, and various alerting techniques (barricades, etc.).

WHAT TO DO:

A. Include in # 5.C above this type of equipment, both from a procedural and procurement prospective.

DEFINITION OF A QUALIFIED PERSON

QUALIFIED PERSON: One familiar with the construction and operation of the equipment and the hazards involved.

NOTE 1: Whether an employee is considered to be a "qualified person" will depend upon various circumstances in the workplace. It is possible and, in fact, likely for an individual to be considered "qualified" with regard to certain equipment in the workplace, but "unqualified" as to other equipment.

NOTE 2: An employee who is undergoing on-the-job training and who, in the course of such training, has demonstrated an ability to perform duties safely at his or her level of training and who is under the direct supervision of a qualified person is considered to be a qualified person for the performance of those duties.

(This definition is taken from 1910.399, including the notes that have been added by these new regulations.)

Introduction:

Course Outline: Classroom, Quiz, Practical. (note 100% to pass)

Purpose: This course is designed to interject a level of safety and awareness around the procedure and technique of resetting overloads.

Changes: IT WILL BE A VOLUNTARY PROGRAM.
TWO PEOPLE GOING INTO SWITCH ROOMS.
one operator one observer
LINE GLOVES SHALL BE WORN
ONE HAND METHOD SHALL BE USED
RESETTING ONLY IN AREA OF RESPONSIBILITY
RESET ONE TIME. SECOND TRIP CALL ELECTRICIAN

Restrictions: ONLY QUALIFIED PERSONNEL ALLOWED TO REST
ONLY RESETTING OVERLOADS PERMITTED
NO: FUSE CHANGING
POT TWEAKING
WIRE TUGGING
GENERAL PROBING

Electricity: DEMO MAN MADE LIGHTING: HIGH VOLTAGE CAN REACH OUT AND TOUCH YOU.

Video: DIFFERENT PATHS CURRENT CAN TAKE THRU A BODY
LEVEL OF SHOCK (EXPLAIN ONE MA)
LINE GLOVES: USE AND INSPECTION
SHOW VIDEO

Demonstration: LINE GLOVE INSPECTION (EVERY TIME)
ONE HAND METHOD (EVERY TIME)

Disclaimer: TO BECOME QUALIFIED YOU NEED THIS COURSE
ONCE QUALIFIED YOU CANNOT QUALIFY ANYONE ELSE
WHEN YOU ENTER AN ENCLOSURE ASSUME EVERYTHING YOU SEE IS <u>HOT</u>
THIS COURSE IS NOT AN APPRENTICESHIP PROGRAM
CLOSE ALL DOORS AFTER YOU RESET
<u>NO TOOLS</u> WILL BE USED FOR RESETS

Name: Date:

ELECTRICAL SAFETY QUIZ

NOTE: Please read the questions carefully, a score of 100% is needed to qualify!

1) 30 volts can kill you. T or F

2) Gloves will not be necessary for mill people to wear when entering an electrical enclosure for the purpose of resetting thermal overloads. T or F

3) You can be shocked even if not grounded. T or F

4) After this course, you will be able to change fuses. T or F

5) After this course, you will be forced to enter electrical enclosures. T or F

6) Once qualified you will only be able to reset overloads on your specific machine. T or F

7) It takes one mill person to safely enter an electrical switch room to reset overloads. T or F

8) It is possible once a shock has begun that you can't let go. T or F

9) Line gloves need not be inspected every time they are used. T or F

10) Once you pass this course you can now qualify anyone to reset overloads. T or F

NAME _____ DATE _____

MILL _____ MACHINE _____

Subject: Chemical Hazard Communication Program (also known as "Right to Know")

PURPOSE

The purpose of this program is to insure that REXAM DSI personnel stay safe and healthy and understand about the hazards when dealing with chemicals in the workplace. As a part of this program we will:

- Identify and list the hazardous chemicals in the Mill.
- Obtain MSDSs and labels for each hazardous chemical.
- Develop and implement this hazard communication program, including labels, MSDSs, and employee training on same.
- Communicate hazard information to our employees through labels, MSDS's and training programs.

LABELS

All containers that hold a hazardous chemical must be labeled, tagged or marked with the identity of the hazardous chemicals contained therein, and must show hazard warnings appropriate for employee protection. When we purchase containers of hazardous chemicals they must arrive with the manufacturer's / distributor's label. The system employed in the Mill for this purpose for other containers that we use or fill, is the Hazardous Materials Identification System (HMIS). Posters that explain the system are hung in appropriate locations in the Mill for ready reference.

MATERIAL SAFETY DATA SHEETS (MSDSs)

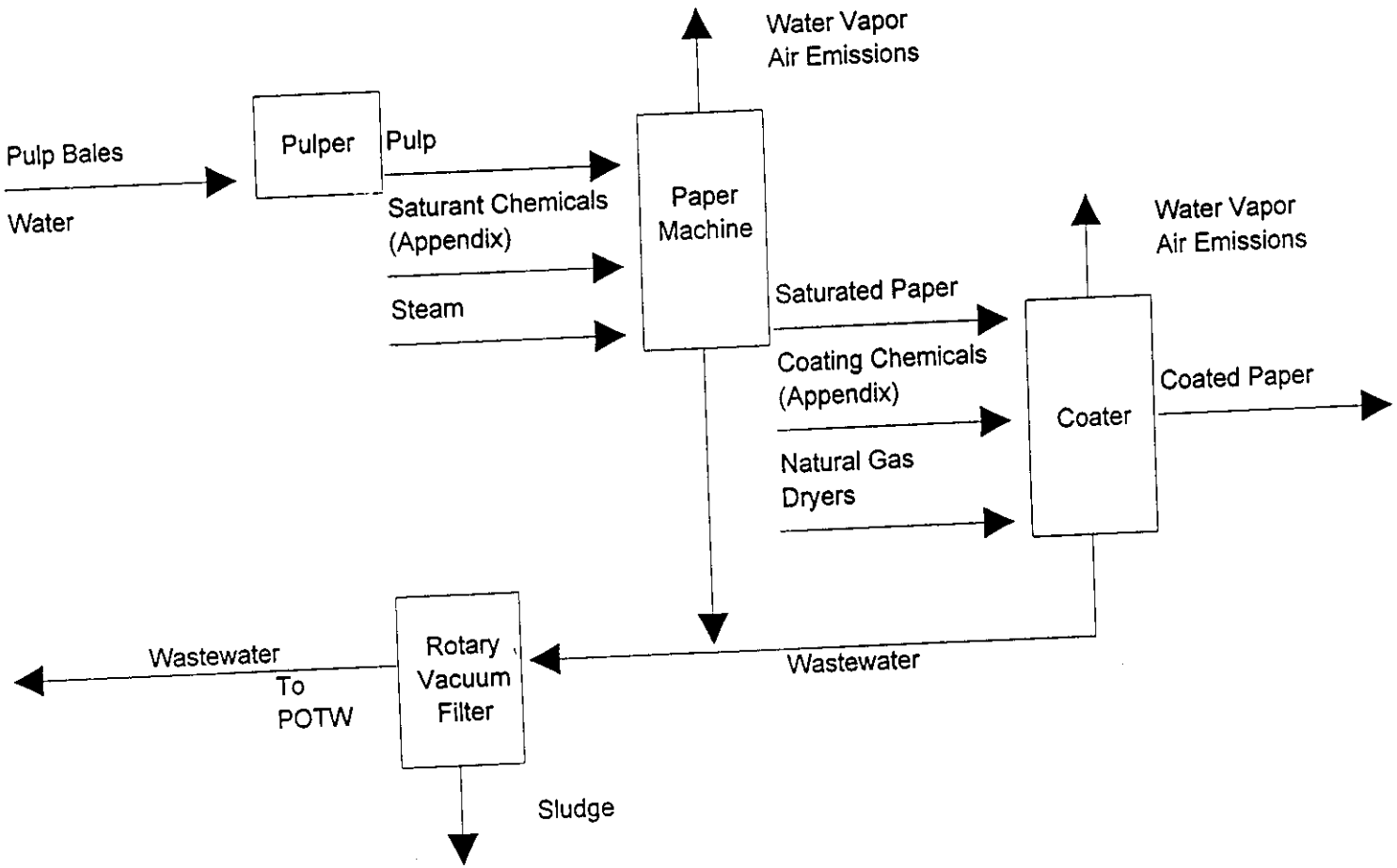
All hazardous chemicals purchased for the Mill must have a MSDS provided by the manufacturer or distributor. It must be in English and it must include information regarding the specific identity of the hazardous chemical(s) involved and the common names. The ANSI standard no. Z400.1 is the preferred format. There are two (2) complete and current sets of MSDSs in the Mill; one in the Foreman's Office (for 24-hour availability) and one in the Process Engineer's office. There is also an abbreviated version, containing all current Process, Boiler and Environmental Chemicals.

EMPLOYEE INFORMATION AND TRAINING

Employees are given information and training on the hazardous materials that they use at the time of the initial assignment and upon introduction of a new chemical.

Information is provided on this program and its requirements, where the hazardous materials exist in their work area and the location of this procedure (in the front of the MSDS books) and locations of the MSDSs (see above).

Training is provided to attain proficiency in the use of labels and MSDSs to attain information regarding physical and chemical characteristics, health effects, exposure limits, precautionary measures, emergency and first aid procedures and personal protective equipment recommendations for the hazardous material use.


Water Vapor
Air Emissions
Pulp Bales
Water
Pulper
Pulp
Saturant Chemicals
(Appendix)
Steam
Paper
Machine
Saturated Paper
Coating Chemicals
(Appendix)
Natural Gas
Dryers
Coater
Water Vapor
Air Emissions
Coated Paper
Wastewater
To
POTW
Rotary
Vacuum
Filter
Wastewater
Sludge

	Raw Material Usage 5 Feb 96 - 4 Feb 97 Sorted by Class Code ** UOM's Vary !!!			
	Data taken from MF R 125			
	Part #	Desription	Amount	UOM
1	70132	MACKENZIE MK-90P SOFTWOOD	5,379.50	BA
2	70143	GRANDE PRAIRIE SOFTWOOD	6,951.75	BA
3	70169	WESTVACO PINNACLEPRIME HARDWD	20.00	BA
4	70178	NYLON6 1/4"x3dmf MINIFIBERS	61,825.00	PD
5	70191	DELTA STOCK	4,820.00	PD
6	70204	ARACRUZ BLEACHEDEUCALYPTUS,STD	9,731.00	BA
7	70205	OHIO 20%MIN POST-CONSUMER	16.00	BA
8	70212	ALABAMA PINE PULP	179.00	BA
9	70213	CELGAR SOFTWOOD "CELECT"	0.00	BA
10	70216	JARILIPTUS BL. EUCALYPTUS	0.00	BA
11	70217	BAHIA SUL PRIME EUCALYPTUS	3,641.00	BA
12	71035	ERIOSIN RED GR	0.00	PD
13	71101	ERIO YELLOW "T" SUPRA	18.70	PD
14	71105	DIPHENYL YELLOW G EXTRA	1.96	PD
15	71118	TINOPAL PT LIQUID	25,553.81	PW
16	71121	PONTAMINE KRAFT ORANGE A LIQ.	9,582.17	PW
17	71122	PONTAMINE YELLOW GXG LIQUID	1,734.09	PW
18	71127	PONTAMINE BLACK SP LIQUID	7,400.18	PW
19	71141	INTRABOND LIQUID RED 5BB	19,739.20	PW
20	71146	ARTILENE RED 1116-9 PASTE	443.75	PW
21	71147	ARTILENE BLACK 9564-9 PASTE	1,686.00	PW
22	71148	INTRABOND LIQ. TURQUOISE GLL	2,771.41	PD
23	71150	PERMABLAK 215 A	291,659.87	PW
24	71151	INTRACID PURE BLUE L PASTE	90.45	PW
25	71157	CARTA VIOLET 3B LIQUID 080	1,093.20	PW
26	71160	ANTHOSIN RED 28L LIQUID	0.00	PW
27	71162	ARTILENE YELLOW 4534-9 PASTE	295.75	PW
28	71164	BHD 6015 BLUE	313.33	PW
29	72051	BUSPERSE 47	0.00	PW
30	72903	#1 KYMENE 557H	4,015.00	PW
31	72959	SODIUM HYDROXIDE	5,026.00	PW
32	72965	BELCOR 585-K	2,150.00	PW
33	72971	AMRES 8855LE	77,088.00	PW
34	72972	AMRES HS30	57,006.10	PW
35	78000	WATER	0.00	GA
36	73004	2671	1,183,374.00	PW
37	73042	26138 (XPE-138)	565,686.45	PW
38	73050	26796	5,422,944.80	PW
39	73070	BUTOFAN NS 278	29,250.00	PW
40	73087	TYLAC 97861-00	8,460.00	PW
41	73094	AIRFLEX 100HS	694,567.00	PW
42	73097	RHOPLEX R-225 (6-4225)	9,705.00	PW
43	73098	TYLAC 68159-00	23,022.00	PW
44	73107	2679	313,340.00	PW
45	74092	OXALIC ACID	556.92	PD
46	74093	UREA	137,487.50	PD

47	74096	ACETIC ACID	23,257.62	PW
48	74099	7498 LIQUID	151,417.84	PW
49	74109	DEFOAMER L-474	6,031.27	PW
50	74130	AMERGEL - 100 ANTIFOAM	999.94	GA
51	74142	8162 EMULSION	412,040.61	PW
52	74149	CATALYST KR	3,576.40	PW
53	74156	ETHOX 3115	24,703.01	PW
54	74201	METSOL DT3H	317.75	PD
55	77001	AQUA AMMONIA	8,968.78	PW
56	77056	PENFORD GUM 280	87,400.00	PD
57	77084	ULTRA GLOSS 90	990,155.00	PD
58	77104	FOAMMASTER NXZ	5,328.07	PW
59	77126	TSPP	2,505.55	PD
60	77141	BUBBLEBREAKER 748 DEFOAMER	1,413.57	PW
61	77144	TITINT WHITE R	20,139.00	PD
62	77145	RPS VANTAGE TI02	63,539.00	PW
63	77156	TINOPAL CBS-X	727.48	PW
64	77173	POLY-EM 40	17,044.50	PW
65	77185	HT CLAY	261,150.00	PD
66	77187	ULTRA WHITE 90	1,063,875.00	PD
67	77189	ANSILEX 93	248,630.00	PD
68	77193	ROPAQUE HP-91 (7-1066)	160,045.00	PW
69	77194	FOAMASTER VF	2,934.95	PD
70	77197	CALGON T	739.30	PD
71	77201	DISPEX N40	2,133.61	PW
72	77203	TAMOL 850	3,363.80	PW
73	77204	SYLOID W 500	34,822.00	PW
74	77206	WITCO 3056A DEFOAMER	2,000.74	PW
75	77207	TACKIDEX 332F	5,709.00	PD
76	77929	CALCIUM CARBONATE H-90	319,256.90	PW
77	77930	CALCIUM CARBONATE COVERCARB	113,475.00	PW

Pulps

	Brownville Pulps		
Part #	Desription	Amount	UOM
70132	MACKENZIE MK-90P SOFTWOOD	5,379.50	BA
70143	GRANDE PRAIRIE SOFTWOOD	6,951.75	BA
70169	WESTVACO PINNACLEPRIME HARDWD	20.00	BA
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70204	ARACRUZ BLEACHEDEUCALYPTUS,ST	9,731.00	BA
70205	OHIO 20%MIN POST-CONSUMER	16.00	BA
70212	ALABAMA PINE PULP	179.00	BA
70213	CELGAR SOFTWOOD "CELECT"	0.00	BA
70216	JARILIPTUS BL. EUCALYPTUS	0.00	BA
70217	BAHIA SUL PRIME EUCALYPTUS	3,641.00	BA
72959	SODIUM HYDROXIDE	5,026.00	PW
72971	AMRES 8855LE	77,088.00	PW
72972	AMRES HS30	57,006.10	PW

Saturant Chems

Part #	Desription	Amount	UOM
71035	ERIOSIN RED GR	0.00	PD
71101	ERIO YELLOW "T" SUPRA	18.70	PD
71105	DIPHENYL YELLOW G EXTRA	1.96	PD
71118	TINOPAL PT LIQUID	25,553.81	PW
71121	PONTAMINE KRAFT ORANGE A LIQ	9,582.17	PW
71122	PONTAMINE YELLOW GXG LIQUID	1,734.09	PW
71127	PONTAMINE BLACK SP LIQUID	7,400.18	PW
71141	INTRABOND LIQUID RED 5BB	19,739.20	PW
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71157	CARTA VIOLET 3B LIQUID 080	1,093.20	PW
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72051	BUSPERSE 47	0.00	PW
72903	#1 KYMENE 557H	4,015.00	PW
73004	2671	1,183,374.00	PW
73042	26138 (XPE-138)	565,686.45	PW
73050	26796	5,422,944.80	PW
73070	BUTOFAN NS 278	29,250.00	PW
73087	TYLAC 97861-00	8,460.00	PW
73098	TYLAC 68159-00	23,022.00	PW
74092	OXALIC ACID	556.92	PD
74093	UREA	137,487.50	PD
74096	ACETIC ACID	23,257.62	PW
74099	7498 LIQUID	151,417.84	PW
74109	DEFOAMER L-474	6,031.27	PW
74130	AMERGEL - 100 ANTIFOAM	999.94	GA
74142	8162 EMULSION	412,040.61	PW
74149	CATALYST KR	3,576.40	PW
74156	ETHOX 3115	24,703.01	PW
77056	PENFORD GUM 280	87,400.00	PD
77084	ULTRA GLOSS 90	990,155.00	PD
77104	FOAMMASTER NXZ	5,328.07	PW
77126	TSPP	2,505.55	PD
77141	BUBBLEBREAKER 748 DEFOAMER	1,413.57	PW

Ctg Chems

73004	2671	1,183,374.00	PW
73042	26138 (XPE-138)	565,686.45	PW
73094	AIRFLEX 100HS	694,567.00	PW
73097	RHOPLEX R-225 (6-4225)	9,705.00	PW
73098	TYLAC 68159-00	23,022.00	PW
73107	2679	313,340.00	PW
74201	METSOL DT3H	317.75	PD
77001	AQUA AMMONIA	8,968.78	PW
77056	PENFORD GUM 280	87,400.00	PD
77084	ULTRA GLOSS 90	990,155.00	PD
77104	FOAMMASTER NXZ	5,328.07	PW
77126	TSPP	2,505.55	PD
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77189	ANSILEX 93	248,630.00	PD
77193	ROPAQUE HP-91 (7-1066)	160,045.00	PW
77194	FOAMASTER VF	2,934.95	PD
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77203	TAMOL 850	3,363.80	PW
77204	SYLOID W 500	34,822.00	PW
77206	WITCO 3056A DEFOAMER	2,000.74	PW
77207	TACKIDEX 332F	5,709.00	PD
77929	CALCIUM CARBONATE H-90	319,256.90	PW
77930	CALCIUM CARBONATE COVERCA	113,475.00	PW

Date: June 12, 1992
D.S.I. BROWNVILLE
RESPIRATORY PROTECTION PROGRAM

PURPOSE:

The purpose of this respiratory protection program is to define how employees will safely use respirators. Brownville will only require the use of respiratory protection when potential airborne hazards cannot be feasibly controlled, when controls are being instituted, and/or when certain tasks are being performed.

SCOPE:

This program applies to the use of respirators by Brownville employees for a limited number of tasks. It is Brownville's policy that respiratory protection will not be worn for emergency purposes. See evacuation plan.

PROGRAM ADMINISTRATION:

The Mill Technical Superintendent will have overall responsibility for the respiratory protection program. Each Supervisor of the affected areas will be responsible for the day to day administration of the program. All employees in the program are responsible to follow this program and the information presented to them.

SELECTION OF RESPIRATORS:

Respirators will be selected based on the hazards and tasks involved. Currently, disposable dust masks are available for employees that add various solid materials into tanks. In addition, ammonia respirators are available for a limited number of employees that perform tasks associated with the aqueous ammonia system.
Ammonia respirators are provided in different sizes so that all affected employees will receive a proper fit. This will be determined during fit testing.
Full face respirators are issued to each employee required to work in the paper machine area during the use of formaldehyde resins (Cyrez 933). Formaldehyde cartridges are located in the foremen's office.

EMPLOYEE TRAINING:

Employees that are required to wear respiratory protection as part of their job requirements are trained in the proper use, limitations, and function of the appropriate respirators.

CLEANING AND DISINFECTION:

Ammonia respirators were purposely selected that do not require cleaning and disinfection. Wearers are instructed to dispose of the dust masks and limited use ammonia respirators after using them.
Wearer of full face respirators are responsible for the cleaning and disinfection of their own respirator after each use.

RESPIRATOR STORAGE:

New respirators are stored in sealed containers in a clean location. Used respirators are to be properly disposed of. Full face respirators are stored in the employee's locker.

RESPIRATOR INSPECTION:

Due to the simplicity of these respirators, inspection is limited to evaluating the respirators when they are taken out of their original container. Employees are instructed to not wear a respirator if it may be defective.

WORK AREA SURVEILLANCE:

Respirators are selected based on the potential airborne hazards and anticipated exposure levels. On a periodic basis, ammonia levels are tested using detector tubes and whenever formaldehyde resins are used on the paper machine, formaldehyde detectors are worn by all mill employees.

PROGRAM EVALUATION:

Supervision in the respirator use areas are instructed to routinely evaluate the ongoing administration of the program. Employees are encouraged to inform their supervisor if they are experiencing any problems when wearing the respirators.

MEDICAL EVALUATIONS:

Employees that are required to wear respiratory protection are provided medical evaluations. These employees are tested on an annual basis. Pulminary function tests are required before ammonia respirators are issued.
Formaldehyde affected employees are checked by doctors.

APPROVED RESPIRATORS:

Only NIOSH approved respirators will be used.

RESPIRATOR FIT TESTING:

Employees that are required to wear the respirators are provided qualitative fit testing annually. In addition, they are instructed to do a positive/negative pressure fit check each time they put on a respirator.

Formaldehyde Training Outline

1. Purpose of class

   To explain the hazards associated with formaldehyde containing compounds.

   To comply with OSHA standards for formaldhyde in the work place.

2. Explain chemicals containing Formaldehyde

   Cyrez 933

   Sunrez 550

   Latices (low levels)

3. Show video

   "Formaldehyde exposure monitoring"

   (21:00 mins.)

4. Explain who will be required to wear respirators for formaldehyde.

   Any employees required to work in the affected area must be issued a respirator after a doctor's exam. The area from first dryer can to the front door of the machine room, to the coater area will be roped off and signs will be posted that respirators are required.

5. Sign statement and attendance sheet.

Chemical Hygiene Plan

The chemical hygiene program is designed to provide labratory personnel with the information necessary to protect themselves from the health hazards presented by hazardous chemicals used in the labratory.

This program also provides labratory personnel with the structure for learning about MSDS use, labratory equipment, procedures, and personal protective equipment available to protect themselves from overexposure to hazardous chemicals.

A. Hazard Identification and Material Labeling

1. The chemical hygiene officer insures the proper use of labels on containers.

2. Chemicals produced in the lab must have proper labels and MSDS information must be available even if the chemical is going to be used up in the lab.

3. Chemical by-products with unknown composition must be considered hazardous and handled appropriately.

4. Chemicals made in the lab and sent out must have proper labels and MSDS sheets.

5. All incoming chemical labels are not to be removed or defaced.

6. A NFPA 704 identification system placard has been placed on the labratory wall to aid in the understanding of the labeling and MSDS hazard identification system.

B. MSDS Information Location

1. The MSDS (Material Safety Data Sheets) are located in the info. storage area of the lab.

2. MSDS files are available whenever the lab is open.

3. MSDS files are updated as suppliers provide new and/or updated forms.

   a. The updating procedure consists of accumulation of incoming MSDS sheets by the front office personnel, copying these MSDS sheets, and sending these copies to the individual responsible for updating the lab files.

4. All incoming chemicals accepted into the lab must either be accompanied by an MSDS sheet or the MSDS sheets must have preceeded the chemicals arrival.

C. Employee Training Intervals

1. Labratory personnel are to be trained upon hiring and whenever new situations are anticipated which would involve exposure to hazardous chemicals.

D. Training Parameters

1. Labratory personnel must be informed that the Chemical Hygiene Plan legislation exists, and that we are required, by law, to have this program.

2. Labratory personnel are told about the NFPA 704 identification system and where to look on the labels to find it.

3. Labratory personnel are told about the location of the MSDS files in the information section of the labratory.

4. Labratory personnel are told that Wyomissing's Chemical Hygiene Plan is on file in the front office (Personnel Manager) in the lab (Technical Director) and with the Compliance Officer of the plant.

5. Methods and observations that may be used to detect hazardous substances:

   a. smell - ex. ammonia odors

   b. feel - ex. "itching" due to acid, "slipperiness" due to basic solutions

   c. seeing - ex. fuming, bubbling, coloring

      1. eyes watering - ex. formaldehyde

   d. air sampling with monitors such as a Draeger air pump

   e. continuous air sampling with a similar monitor as above

   f. it should also be noted that some hazardous materials are colorless, tasteless and odorless

6. Protective measures available

   a. use of exhaust hood

   b. use of exhaust fan (at front of building)

   c. use and location of eye wash station

   d. use and location of emergency shower

   e. fire extinguisher location

7. Personal protective equipment available
   a. latex rubber gloves
   b. respirators and the various filter types
   c. goggles and/or face shields
   d. labratory coats
   e. safety shoes
   f. eye wash stations
   g. emergency shower

8. Protective procedures for working with hazardous chemicals
   a. avoid skin contact, therefore labratory coats and latex gloves are available
   b. when working with liquids, if there is a danger of splashing, eye protection must be worn
   c. use "buddy" system, i.e. don't work alone in labratory if using hazardous procedures
   d. when working with gases, all work must be done in properly ventilated areas, preferrably exhaust hoods
   e. highly toxic chemicals should be stored in double containers

9. Carcinogens - Designated area
   a. all work done with designated carcinogens must be done in the designated carcinogen area which is the labratory working area (this does not include the storage racks) (this also applies to suspected carcinogens)

10. Respirator usage
   a. respirator filters must be selected according to the type of hazard being subjected to
   b. respirators must be regularly cleaned, disinfected and kept in a clean location
   c. worn or defective parts must be replaced
   d. the chemical hygiene officer has the right to hold a respirator inspection whenever it is deemed necessary
   e. the chemical hygiene officer is expected to insure proper respirator usage

E. Equipment Maintenance

1. The chemical hygiene officer shall inspect the operation of the exhaust hood quarterly.
   a. a log of the pass/fail test shall be maintained
      1. fail tests shall initiate a notice to the lab manager from the chemical hygiene officer for repair

F. Hazardous Chemical Exposure Monitoring

1. A copy of the Tables Z-1-A, Z-2, and Z-3 from the OSHA regulations is available for inspection by labratory personnel.
   a. the highlighted chemicals in the tables can be found with the Chemical Hygiene plan.
      1. this may not be an all inclusive list
2. Monitoring for exposure levels to a specific chemical will occur if there is reason to believe the exposure levels are exceeding the action level (or PEL, if no action level)
3. Periodic monitoring will occur if initial exposure monitoring proves to be over the action level (or PEL)
   a. monitoring will be terminated whenever exposure is proved to be below the action level (or PEL)
4. Labratory personnel will be notified within 15 days of receipt of monitoring results either by posting the results or by individuals written notification.

G. Medical consultation and examinations

1. Labratory personnel will be offered the opportunity to receive medical attention and/or follow up examinations whenever any one of the following conditions exist.
   a. the employee exhibits signs and/or symptoms of overexposure to a hazardous chemical
   b. the employee is exposed to a hazardous chemical due to a spill, leak, explosion, etc.
   c. the employee is routinely exposed to a hazardous chemical above the action level or PEL
2. The physician shall provide the employee and the employer with the results and recommendations.

H. Emergency Procedures

1. Utilize emergency shower, eye wash station, etc. to minimize personal bodily damage.
2. Utilize fire extinguishers, etc. to minimize spread of problem.
3. Notify Technical Director or if unavailable, the chemical hygiene officer immediately.
4. Technical Director or Chemical Hygiene officer will notify the shift emergency response coordinator.

REXAM DSI

BROWNVILLE DIVISION

MILL GUIDELINES FOR MAJOR EMERGENCY ACCIDENTS

MAJOR EMERGENCY ACCIDENTS ARE THOSE ACCIDENTS DEFINED AS CAUSING MAJOR WOUNDS TO THE BODY. SEVERE BLEEDING, AN UNCONSCIOUS EMPLOYEE, HEAD INJURIES AND POSSIBLE FRACTURES OF THE NECK OR BACK SHOULD ALL BE CONSIDERED MAJOR ACCIDENTS.

THE FOREMAN ON DUTY SHOULD BE IMMEDIATELY INFORMED THAT AN ACCIDENT HAS OCCURRED. IT IS HIS RESPONSIBILITY TO SEE THAT ALL THE FOLLOWING PROCEDURES ARE ADHERED TO.

1. THE VICTIM SHOULD BE KEPT QUIET AT ALL TIMES. ONE EMPLOYEE SHOULD STAY WITH THE VICTIM AND ADMINISTER FIRST AID. IF NEEDED, THERE IS A PORTABLE STRETCHER WITH A BLANKET AVAILABLE NEXT TO THE FOREMAN'S OFFICE.

2. ONE EMPLOYEE SHOULD GET THE KEY TO THE FIRST AID BOX FROM THE FOREMAN OR BOILERMAN AND GO GET THE FIRST AID KIT LOCATED IN THE MAIN LOBBY LEADING FROM THE FRONT DOOR TO THE MILL. THIS EMERGENCY KIT ALSO HAS A BREAK AWAY LOCK WHICH WILL BREAK WITH A BLOW FROM A HAMMER OR WRENCH.

3. ONE EMPLOYEE SHOULD GO TO THE NEAREST TELEPHONE EITHER IN THE FOREMAN'S OFFICE OR BOILER ROOM AND CONTACT 911 AND ASK FOR ASSISTANCE FROM THE DEXTER EMERGENCY RESCUE SQUAD.

4. IN THE CASE WHERE THE COMPLETE SEVERANCE OF A BODY PART HAS OCCURRED, THE DISMEMBERED PART SHOULD BE SAVED, PACKED IN ICE IF POSSIBLE AND SENT ALONG WITH THE INJURED EMPLOYEE TO THE HOSPITAL.

REXAM DSI

BROWNVILLE DIVISION

EMERGENCY AND EVACUATION PLAN

INCIPIENT STAGE FIRES (ONES WHICH ARE IN THE INITIAL STAGE, CAN BE CONTROLLED OR EXTINGUISHED WITH PORTABLE FIRE EXTINGUISHERS WITHOUT THE NEED FOR PROTECTIVE CLOTHING OR BREATHING APPARATUS) WILL BE FOUGHT BY MILL PERSONNEL.

ALL EMPLOYEES WILL BE TRAINED ON THE PROPER USE OF FIRE EXTINGUISHERS AND WILL BE GIVEN A REFRESHER COURSE EACH YEAR THEREAFTER.

WHENEVER AN EMERGENCY IS DETECTED, THE SUPERVISOR ON SHIFT IS TO BE ADVISED IMMEDIATELY. HE WILL TAKE CHARGE AND DIRECT THE ACTIVITIES. IF HE FEELS THAT AN EMERGENCY IS OF A SERIOUS ENOUGH NATURE, HE WILL DIRECT THE PAPER TESTER TO CALL 911 AND ADVISE THEM THAT THERE IS AN EMERGENCY AT THE REXAM DSI BROWNVILLE PAPER MILL LOCATED AT 101 BRIDGE STREET, BROWNVILLE, NEW YORK.

HE WILL DIRECT THE THIRD HAND TO PROCEED TO THE OUTSIDE OF THE MILL AND GIVE DIRECTIONS TO THE EMERGENCY CREWS WHEN THEY ARRIVE.

THE MACHINE TENDER WILL SEE THAT ALL HOOD AND ROOF EXHAUST FANS ARE SHUT DOWN. HE WILL KEEP THE DRYER SECTIONS RUNNING.

IF MANAGEMENT PEOPLE ARE NOT AT THE MILL, THE BOILER HOUSE OPERATOR WILL CALL THE FOLLOWING AND ADVISE THEM OF THE EMERGENCY.

NORM TOMLINSON - 583-6189

ART HILTS - 649-2815

HE WILL ALSO CALL THE FOLLOWING MAINTENANCE PEOPLE AND ADVISE THEM OF THE EMERGENCY:

DENNIS TROMBLEY - 788-5596

RICK WILSON - 782-8332

FOR A FIRE:

THE BOILER HOUSE OPERATOR WILL THEN CHECK THE AUTOMATIC STARTING FIRE PUMP PROMPTLY AND STAND BY TO OPERATE SPRINKLER VALVES AS REQUIRED AND ELECTRICAL SWITCHES IF IT IS NECESSARY TO TURN OFF POWER TO ANY AREA.

EFFORTS WILL BE MADE TO EXTINGUISH THE FIRE, MAKING SURE THAT PROPER EXTINGUISHERS ARE USED. FOR EXAMPLE: DO NOT USE WATER ON AN ELECTRICAL FIRE - USE EITHER CO2 OR DRY POWDER.

IF IT IS POSSIBLE TO BRING THE FIRE UNDER CONTROL USING THE AVAILABLE IN-PLANT EQUIPMENT, THEN THE FOLLOWING PROCEDURES WILL BE FOLLOWED:

1. IF ANYONE HAS INHALED TOO MUCH SMOKE OR SUFFERED CUTS AND ABRASIONS, THE SUPERVISOR IS TO MAKE SURE THAT THEY ARE PROPERLY CARED FOR. IF NECESSARY, HE WILL HAVE THE PAPER TESTER CALL 911 TO TRANSPORT THE INJURED TO THE HOSPITAL EMERGENCY ROOM.

2. IF THE SPRINKLER SYSTEM HAS BEEN IN OPERATION, THE CONTROL VALVE FOR THE AREA OF THE FIRE WILL BE CLOSED BY THE BOILER OPERATOR AND MAINTENANCE PERSONNEL WILL REPLACE THE NECESSARY HEADS. AFTER THE HEADS ARE REPLACED, THE WATER IS TO BE TURNED BACK ON.

3. THE FIRE PUMP IS TO REMAIN IN OPERATION UNTIL THE SYSTEM IS CHECKED OUT AND THE WATER TOWER IS FULL.

4. THE SUPERVISOR WILL DIRECT HIS CREW TO TAKE ALL USED FIRE EXTINGUISHERS TO THE BOILER HOUSE WHERE THEY WILL BE PICKED UP AND REFILLED AT THE EARLIEST POSSIBLE TIME.

5. IF THE FIRE HAS BEEN ON THE MACHINE, ANY NECESSARY REPAIRS WILL BE MADE AND THE MACHINE PUT BACK IN PRODUCTION.

6. IF THE FIRE DEVELOPS INTO A STRUCTURAL FIRE, EVACUATION PLAN SHOULD BE FOLLOWED.

EVACUATION PLAN:

SHOULD THE SUPERVISOR DETERMINE THAT THE EMERGENCY HAS GOTTEN OUT OF CONTROL, HE WILL IMMEDIATELY SOUND THE ALARM, PULL STATIONS AT EXITS TO ADVISE ALL PERSONNEL TO EVACUATE THE BUILDING.

1. MACHINE CREWS WILL LEAVE BY THE FRONT DOOR ON BRIDGE STREET.

2. COATER, REWINDER AND ROLL WRAPPING CREWS LEAVE BY THE SIDE DOOR.

3. BEATER ROOM, BOILER HOUSE AND MAINTENANCE CREWS WILL LEAVE BY THE BOILER HOUSE DOOR.

4. ALL CREWS WILL PROCEED TO THE AMERICAN LEGION PARKING LOT.

5. ALL OFFICE PERSONNEL WILL LEAVE BY THE FRONT DOOR ON BRIDGE STREET.

6. THE SUPERVISOR ON HIS WAY OUT WILL PICK UP THE CREW SCHEDULE OF THE PERSONNEL WORKING IN THE MILL AT THE TIME OF THE EMERGENCY. UPON HIS ARRIVAL AT THE LEGION PARKING LOT, HE WILL CHECK TO MAKE SURE THAT EVERYONE HAS BEEN EVACUATED.

REXAM DSI

BROWNVILLE DIVISION

MILL GUIDELINES FOR MAJOR EMERGENCY ACCIDENTS

MAJOR EMERGENCY ACCIDENTS ARE THOSE ACCIDENTS DEFINED AS CAUSING MAJOR WOUNDS TO THE BODY. SEVERE BLEEDING, AN UNCONSCIOUS EMPLOYEE, HEAD INJURIES AND POSSIBLE FRACTURES OF THE NECK OR BACK SHOULD ALL BE CONSIDERED MAJOR ACCIDENTS.

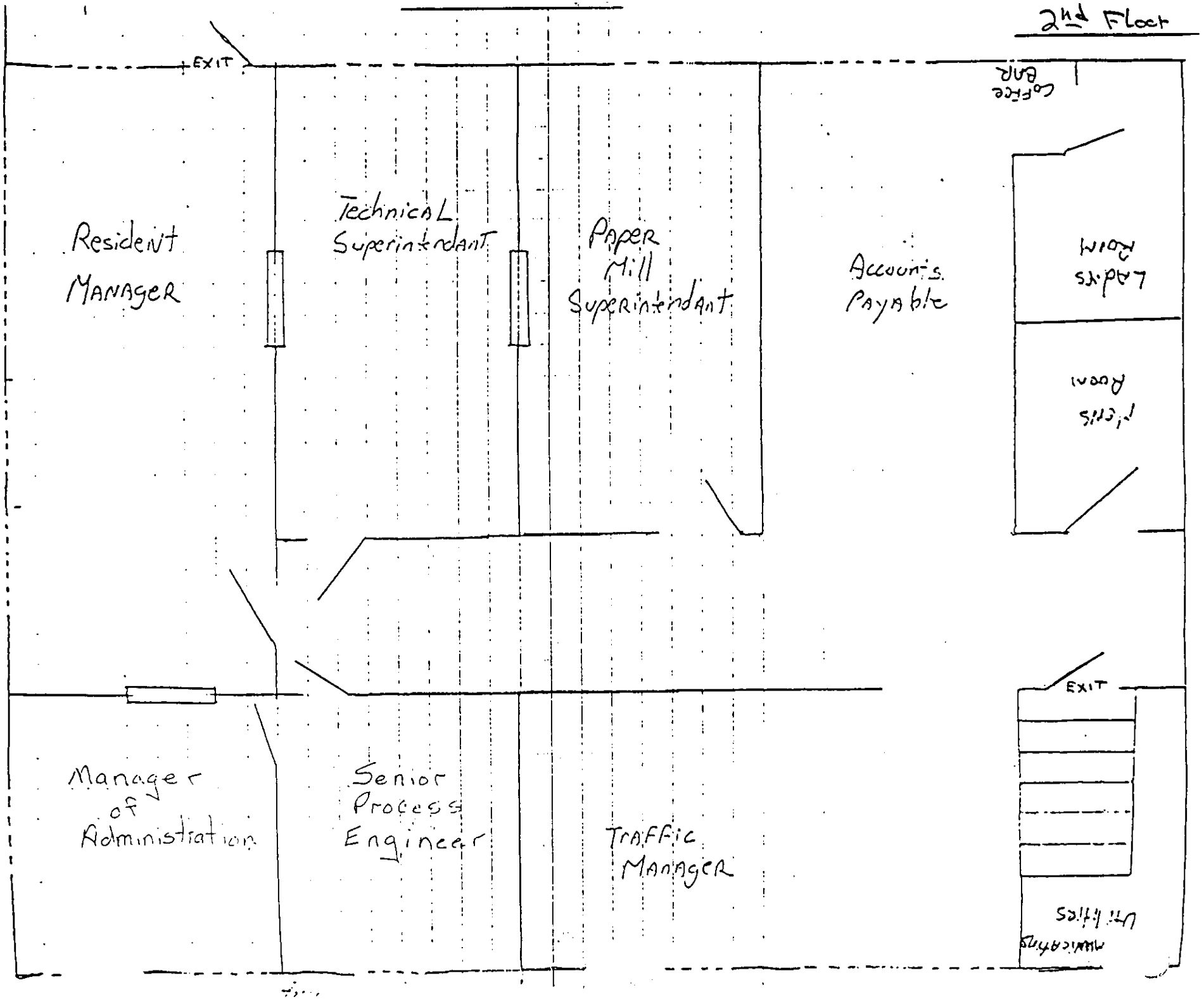
THE FOREMAN ON DUTY SHOULD BE IMMEDIATELY INFORMED THAT AN ACCIDENT HAS OCCURRED. IT IS HIS RESPONSIBILITY TO SEE THAT ALL THE FOLLOWING PROCEDURES ARE ADHERED TO.

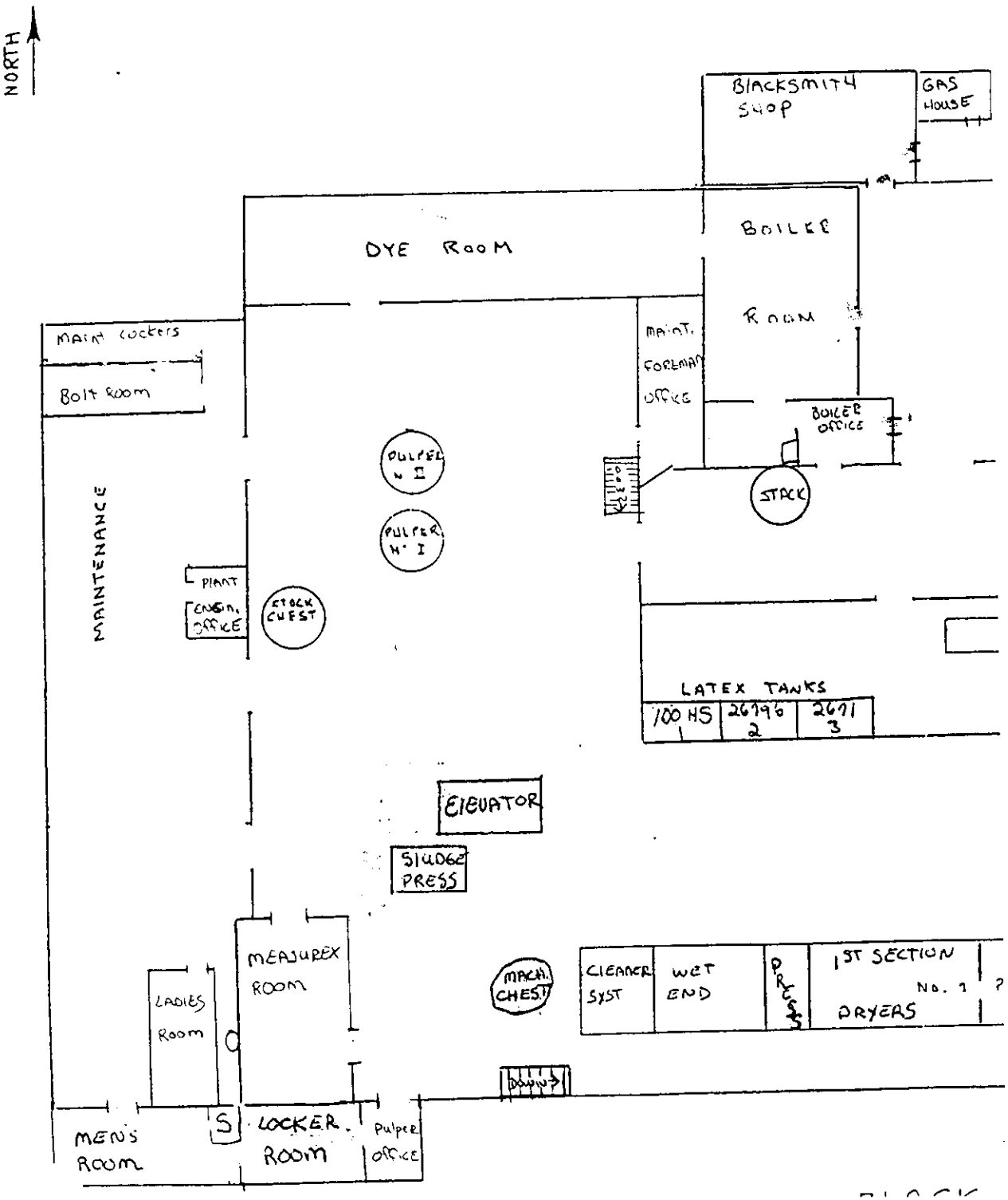
1. THE VICTIM SHOULD BE KEPT QUIET AT ALL TIMES. ONE EMPLOYEE SHOULD STAY WITH THE VICTIM AND ADMINISTER FIRST AID. IF NEEDED, THERE IS A PORTABLE STRETCHER WITH A BLANKET AVAILABLE NEXT TO THE FOREMAN'S OFFICE.

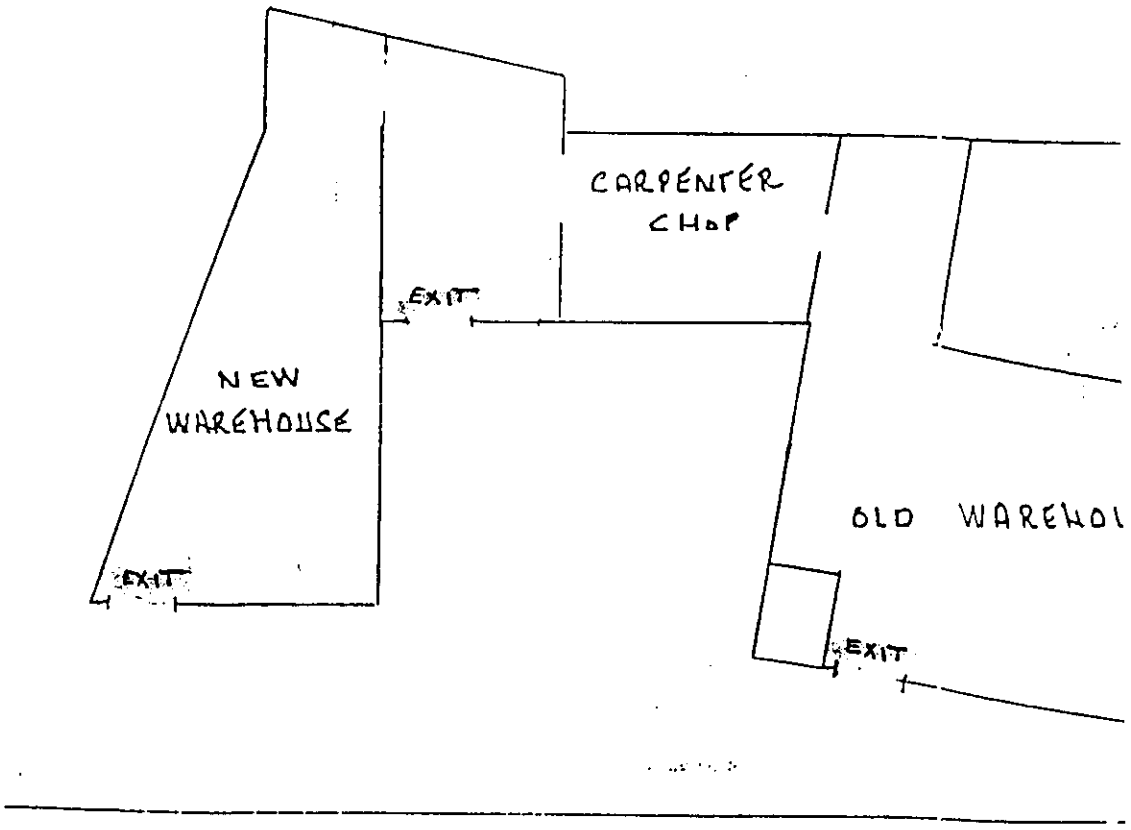
2. ONE EMPLOYEE SHOULD GET THE KEY TO THE FIRST AID BOX FROM THE FOREMAN OR BOILERMAN AND GO GET THE FIRST AID KIT LOCATED IN THE MAIN LOBBY LEADING FROM THE FRONT DOOR TO THE MILL. THIS EMERGENCY KIT ALSO HAS A BREAK AWAY LOCK WHICH WILL BREAK WITH A BLOW FROM A HAMMER OR WRENCH.

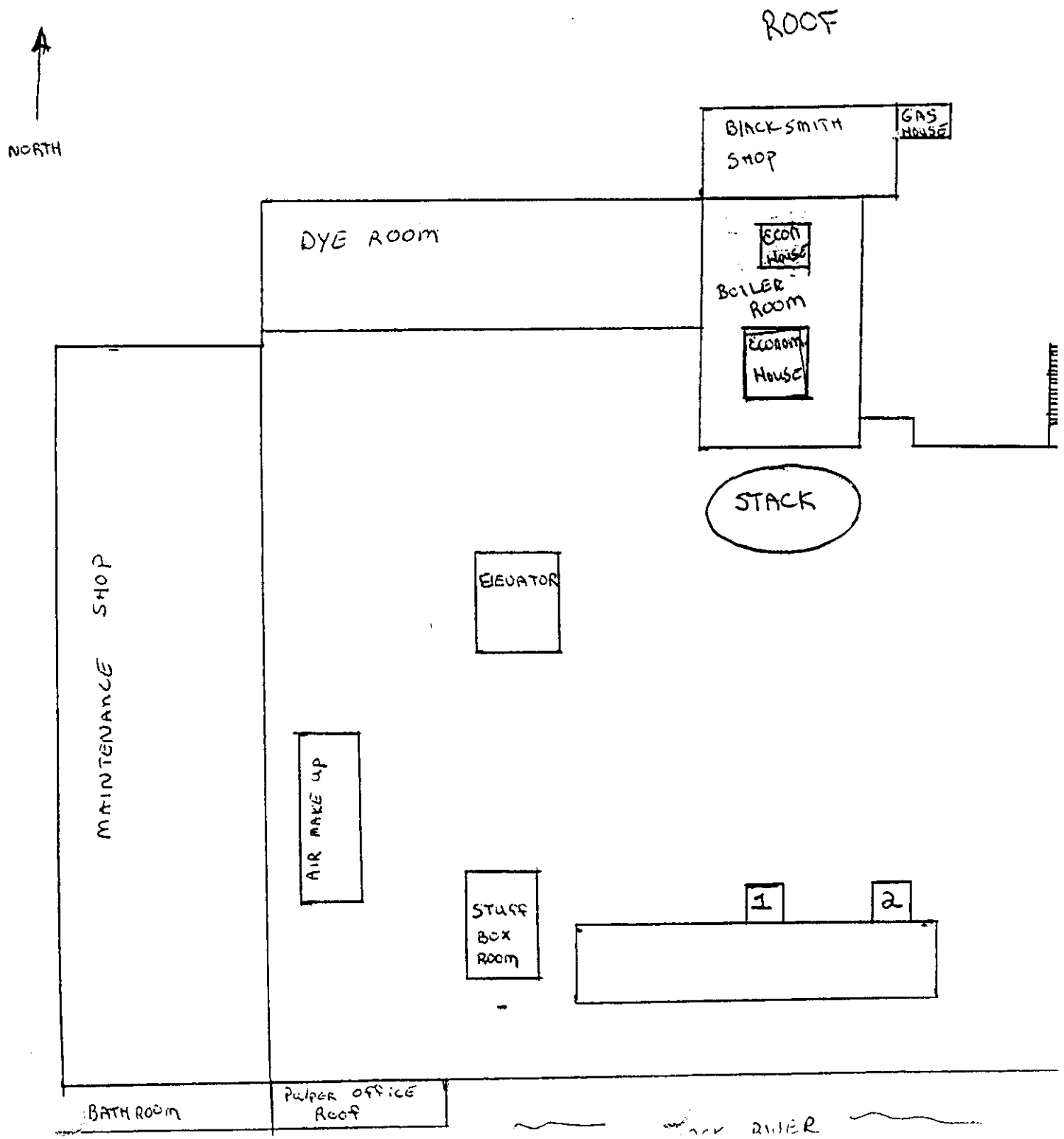
3. ONE EMPLOYEE SHOULD GO TO THE NEAREST TELEPHONE EITHER IN THE FOREMAN'S OFFICE OR BOILER ROOM AND CONTACT 911 AND ASK FOR ASSISTANCE FROM THE DEXTER EMERGENCY RESCUE SQUAD.

4. IN THE CASE WHERE THE COMPLETE SEVERANCE OF A BODY PART HAS OCCURRED, THE DISMEMBERED PART SHOULD BE SAVED, PACKED IN ICE IF POSSIBLE AND SENT ALONG WITH THE INJURED EMPLOYEE TO THE HOSPITAL.


2nd Floor
EXIT
Resident MANAGER
Technical Superintendant
Paper Mill Superintendant
Accounts Payable
Coffee BAR
Ladies Room
Gents Room
Manager of Administration
Senior Process Engineer
TRAFFIC MANAGER
EXIT
Men's Room
Ladies Room


NORTH
BLACKSMITH SHOP
GAS HOUSE
DYE ROOM
BOILER ROOM
MAINT. FOREMAN OFFICE
BOILER OFFICE
STACK
MAIN LOCKERS
BOLT ROOM
MAINTENANCE
PULPER NO II
PULPER NO I
PLANT ENGIN. OFFICE
STOCK CHEST
LATEX TANKS
100 HS 1
26196 2
2611 3
ELEVATOR
SLUDGE PRESS
MEASUREX ROOM
LADIES ROOM
MACH. CHEST
CLEANER SYST
WET END
PRESS
1ST SECTION
No. 1
DRYERS
DOWN
MEN'S ROOM
S
LOCKER ROOM
Pulper office


CARPENTER
CHOP
EXIT
NEW
WAREHOUSE
EXIT
OLD WAREHOI
EXIT
BRIDGE STREE


ROOF
NORTH
BLACK-SMITH SHOP
GAS HOUSE
DYE ROOM
ECON HOUSE
BOILER ROOM
ECONOMY HOUSE
STACK
ELEVATOR
MAINTENANCE SHOP
AIR MAKE UP
STUFF BOX ROOM
1
2
BATH ROOM
PULPER OFFICE ROOF

NOTICE

NOISE SURVEY

A NOISE SURVEY WAS CONDUCTED AT BROWNVILLE TO PROVIDE INFORMATION ON EACH JOB AND AREA IN THE MILL. O.S.H.A. STANDARDS REQUIRE THAT IF AN AREA MEETS OR EXCEEDS 85 dB'S ON THE AVERAGE FOR AN 8 HOUR PERIOD, HEARING PROTECTION IS REQUIRED. BASED ON THE RESULTS OF THE SURVEY, BROWNVILLE WILL BE ADOPTING A HEARING CONSERVATION POLICY WHICH STATES THAT HEARING PROTECTION WILL BE REQUIRED FOR THOSE EMPLOYEES WORKING IN PRODUCTION AREAS OF THE MILL EFFECTIVE JANUARY 1, 1990. THE ONLY EXCEPTIONS ARE NON-PRODUCTION AREAS (UPSTAIRS OFFICE, FOREMAN'S OFFICE, MAINTENANCE FOREMAN'S OFFICE, LAB AND WAREHOUSE, MAINTENANCE SHOP, BOILER ROOM OFFICE, LOADING DOCK AND RESTROOM). THIS POLICY HAS BEEN ADOPTED TO INSURE PROTECTION FOR THE BROWNVILLE EMPLOYEES AND IT WILL BE ENFORCED STARTING JANUARY 1, 1990.

IF ANYONE WISHES TO OBTAIN PROPER HEARING PROTECTION DEVICES OTHER THAN WHAT IS CURRENTLY AVAILABLE AT BROWNVILLE, PLEASE CONTACT THE FOREMAN ON YOUR SHIFT OR ANY MEMBER OF THE SAFETY COMMITTEE.

Decorative
Specialties
International
Incorporated

DECORATIVE SPECIALTIES INTERNATIONAL
HEARING CONSERVATION PROGRAM
BROWNVILLE

IT IS THE COMPANY'S POLICY TO COMPLY WITH OSHA OCCUPATIONAL NOISE EXPOSURE REGULATIONS (1910.85), AND TO PROVIDE AN EFFECTIVE HEARING CONSERVATION PROGRAM FOR EMPLOYEES. IT IS THE RESPONSIBILITY OF MANAGEMENT TO:

1. ASSIST IN THE CONTROL OF NOISE EXPOSURES TO WITHIN SAFE LEVELS.

2. PREVENTION OF HEARING LOSS AMONG EMPLOYEES BY PROVIDING FOR THE DETECTION OF HEARING LOSS AND PROVIDING PROTECTIVE DEVICES TO EMPLOYEES WHO WORK IN AREAS WHERE NOISE IS OF POTENTIALLY HARMFUL INTENSITY.

A PROGRAM TO CONTROL EXPOSURE TO HAZARDOUS NOISE IS PART OF THE COMPANY'S SAFETY PROGRAM, AND PROVIDES FOR:

MONITORING:

IDENTIFY THOSE AREAS WHERE EMPLOYEES ARE EXPOSED AT OR ABOVE AN 8-HOUR TIME WEIGHTED AVERAGE OF 85 DECIBELS.

NOISE LEVELS SHOULD BE DETERMINED BY PERIODIC SURVEYS THROUGH OUT THE MILL.

ELIMINATION OF NOISE AT ITS SOURCE, WHENEVER POSSIBLE.

AUDIOMETRIC TESTING:

SCHEDULES FOR TESTING AUDIOMETRIC MEASUREMENTS SHOULD BE TAKEN ON ALL NEW EMPLOYEES.

ANNUAL AUDIOMETRIC MEASUREMENTS SHOULD BE TAKEN ON ALL EMPLOYEES EXPOSED TO NOISE LEVELS THAT EQUAL OR EXCEED AN 8 HOUR TIME-WEIGHTED AVERAGE OF 85 DECIBELS MEASURED ON THE A SCALE.

Bridge Street, Brownville, New York 13615 Tel: 315 - 782-5800 Fax: 315 - 782-5416

Decorative
Specialties
International
Incorporated

TRAINING:

ALL EMPLOYEES EXPOSED AT THE ACTION LEVEL MUST BE TRAINED ANNUALLY ON THE EFFECTS OF NOISE ON THE EAR.

INSTRUCTING EMPLOYEES IN THE USE AND CARE OF PROTECTIVE DEVICES.

EXPLAIN THE PURPOSE AND PROCEDURES FOR THE AUDIOMETRIC TESTING.

ALL NEW EMPLOYEES WILL BE INITIALLY TRAINED CONCERNING THE COMPANY'S HEARING CONSERVATION PROGRAM AND THE EFFECTS OF NOISE ON THE INDIVIDUAL.

PROTECTION DEVICES:

THE COMPANY HAS SELECTED SEVERAL TYPES OF EAR PLUGS AND MUFFS WHICH ARE AVAILABLE THROUGH OUT THE MILL. ONLY APPROVED EAR PLUGS AND MUFFS ARE TO BE USED.

PROCEDURES:

MAINTAIN THE RECORDS OF AUDIOMETRIC FINDINGS.

ALL AUDIOGRAMS ARE READ BY AN AUDIOLOGIST AND RECOMMENDATIONS ARE MADE. A COPY OF THE EMPLOYEES TEST AND RECOMMENDATIONS ARE GIVEN TO THE EMPLOYEE.

THE HOME
INSURANCE
COMPANY

THE ATRIUM
SUITE 350
CLINTON SQUARE
SYRACUSE, NY 13202
315 472 6761

P.O. BOX 4805
SYRACUSE, NY 13221

September 10, 1992

Mr. Nick Arvan
Resident Manager
Decorative Specialities International, Inc.
Bridge Street
Brownville, New York 13615

Dear Mr. Arvan:

Attached is a copy of the noise exposure evaluation conducted at the Decorative Specialities International manufacturing facilities on September 3, 1992.

As per the attached data sheet, several areas in the manufacturing facility had noise levels above the action level of 85 dBA. Additionally, several work station areas also had noise level measurements at or above the 90 dBA permissible exposure limit.

Discussion regarding the facilities Hearing Conservation Program disclosed that the program covers the appropriate segments regarding employee training, baseline and annual audiogram testing, provided use of hearing protection and continued engineering and administrative controls to help reduce the employees' exposure. These are commensurate with the Occupational Noise Standard 1910.95, therefore, no recommendations are being submitted.

Sincerely,

Joseph A. Sobczak

Joseph A. Sobczak, ALCM
Loss Control Consultant

JAS:jm
JS.4

THE HOME INSURANCE COMPANY

HOME 1853

Industrial Hygiene Survey Report

DECORATIVE SPECIALITIES INTERNATIONAL, INC.
BRIDGE STREET
BROWNVILLE, NEW YORK 13615

Prepared by JOSEPH A. SOBCZAK, ALCM
LOSS CONTROL CONSULTANT
SEPTEMBER 4, 1992

Loss Control Department SYRACUSE, NEW YORK

See important notice on reverse side.

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Decorative Specialities International, Inc.
Bridge Street
Brownville, New York 13615

Contact was made with Mr. John Greenwood, Manager of Administration and Mr. Art Hilts, Production Manager on September 3, 1992 for the purpose of evaluating the noise level exposures in the manufacturing and warehouse facilities.

Noise measurements were taken and work practices and procedures were observed and discussed. The noise results represent conditions found at the time of the visit only, and may not represent conditions at other times. We took noise measurements to estimate workplace exposures and not to determine compliance or non-compliance with regulatory or legal standards.

The conclusions in the Exposure Evaluation section of this report are based on the noise measurements and work practices observed on this date. The noise measurements are outlined in the Data section of this report on the provided floor plan.

At the completion of this survey, we discussed our preliminary findings based on standard Industrial Hygiene and safety practices and procedures.

NOISE EXPOSURE EVALUATION

The sound level meter test results obtained during this evaluation disclosed that several of the work station areas were at or above the action level of 85 dBa and also of that of the permissible exposure limit of 90 dBa as shown on the attached floor plan data sheet. Existing noise control technologies (engineering controls) have been attempted where practical to help reduce noise levels throughout the manufacturing areas. However, in many instances, they are not practical nor feasible, therefore strong adherence to the Hearing Conservation Program including the use of hearing protection, audiometric testing and employee training requirements is implemented as a means to help protect the employees from occupational noise induced hearing loss.

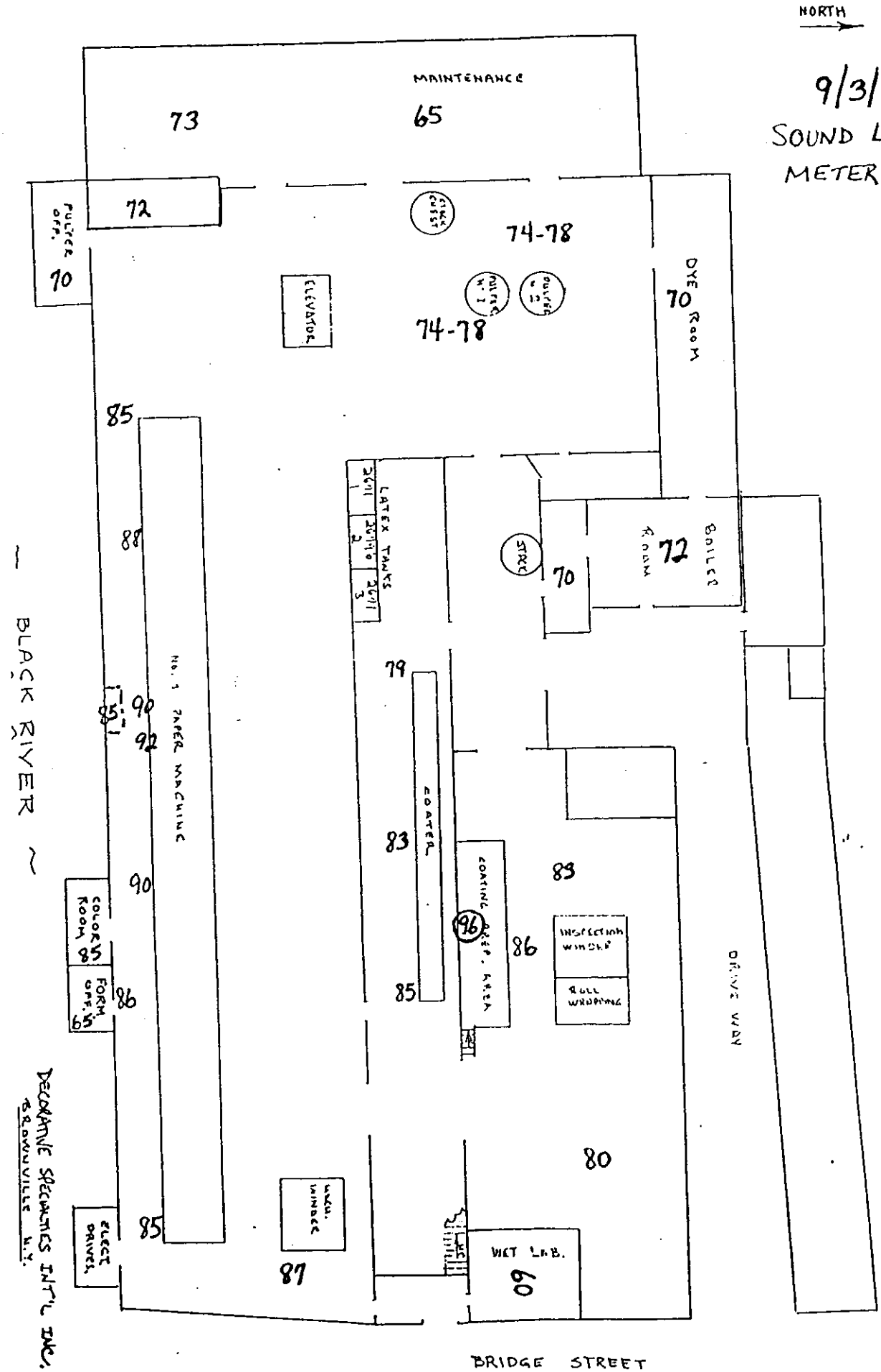
RECOMMENDED PLAN OF ACTION

Based on the present status of the facility's implementation of a formal Hearing Conservation Program being presently devised in a full, written format, critical topic areas such as baseline and annual audiometric testing, employee training, use of hearing protection, and implementation of engineering and/or administrative controls wherever feasible are considered adequate, therefore no recommendation is being submitted.

DISCUSSION

NOISE EVALUATION

With the implementation of the present Hearing Conservation Program as presently in place, and with the results obtained, it was discussed and agreed upon that the present program will continue to be administered with appropriate changes and methods of corrective action followed depending on the facility's requirements. This would incorporate such items as future noise evaluation testing such as when the new sludge press is put on line and operational (to be completed in our November service visit).


NORTH
9/3/92
SOUND LEVEL METER TESTS
MAINTENANCE
73
65
72
PULPER OPR.
70
STOCK CLEST
74-78
ELEVATOR
PULPER NO. 1
PULPER NO. 2
74-78
DYE ROOM
70
85
88
LATEX TANKS
STOR.
70
BOILER ROOM
72
79
85
90
92
NO. 1 PAPER MACHINE
COATER
83
COATING PREP. AREA
96
86
83
INSPECTION WINDER
ROLL WRAPPING
DRIVE WAY
COLOR ROOM
85
FORM OPR.
65
90
86
85
MACH. WINDER
87
ELECT DRIVES
85
WET LAB.
69
80
BLACK RIVER
DECORATIVE SPECIALTIES INT'L INC.
BROWNVILLE N.Y.
BRIDGE STREET

APPENDIX I

TECHNICAL DEFINITIONS

1. *Permissible Exposure Level (PEL) - Is that which is allowed for an eight (8) hour workday. Occupational Safety and Health Administration (OSHA) Standard is 90 dBa = 100% and 85 dBa = 50% (action level) for eight (8) hours.*

2. *dBA - The noise level measured in decibels (dB) using the "A" weighted network. The "A" network on a sound level meter causes the meter to vary with the frequency and intensity of sound much like the human ear.*

STATE OF NEW YORK
WORKERS' COMPENSATION BOARD

EMPLOYER'S REPORT OF WORK-RELATED ACCIDENT/OCCUPATIONAL DISEASE

‹ this notice directly to Chair, Workers' Compensation Board at address shown on reverse side within ten (10) days af ident occurs. Answer all questions fully. Copy also should be sent to your workers' compensation insurance carrier. Tl orm replaces all previous versions of Forms C-2 and C-2.5.

ANSWER ALL QUESTIONS FULLY

TYPEWRITER PREPARATION IS STRONGLY RECOMMENDED—INCLUDE ZIP CODE IN ALL ADDRESSES—EMPLOYEE'S S.S. NO. MUST BE ENTERED BELOW

WCB CASE NO.(If Known)	CARRIER CASE NO.	CODE NO.	WC POLICY NUMBER	DATE OF ACCIDENT	EMPLOYEE'S S.S. NO.

1.(a) EMPLOYER'S NAME	(b) EMPLOYER'S MAILING ADDRESS	(c) OSHA CASE/FILE NO.
(d) LOCATION (If Different From Mail Address)	(e) NATURE OF BUSINESS (Principal Products, Services, etc.)	(f) NYS U.I. EMPLOYER REG. NO.
2.(a) INSURANCE CARRIER	(b) CARRIER'S ADDRESS	
3.(a) INJURED PERSON (First, M.I., Last)	(b) ADDRESS (Includes No. & Street, City, State, Zip & Apt. No.)	

ACCIDENT

4. (a) ADDRESS WHERE ACCIDENT OCCURRED		(b) COUNTY	(c) WAS ACCIDENT ON EMPLOYER'S PREMISES? ☐ Yes ☐
5. TIME OF ACCIDENT AM PM	6. DEPT. WHERE REGULARLY EMPLOYED	7. (a) DATE STOPPED WORK BECAUSE OF THIS INJURY/ILLNESS	(b) WAS INJURED PAID IN FULL FOR DAY? ☐ Yes ☐

INJURED PERSON

8. SEX	9. AGE	10. OCCUPATION (Specific job title at which employed).	
11. (a) AVERAGE EARNINGS PER WEEK?		(b) TOTAL EARNINGS PAID DURING 52 WEEKS PRIOR TO DATE OF ACCIDENT (Include bonuses, overtime, value of lodging, etc.)	
12. (a) PART OR FULL TIME WORKER?		(b) INJURED WORKER'S WORK WEEK (Indicate days of week usually worked).	

NATURE OF INJURY

13. NATURE OF INJURY AND PART(S) OF BODY AFFECTED		14. (a) DID YOU PROVIDE MEDICAL CARE? ☐ Yes ☐ No	(b) IF YES, WHEN?
15.(a) NAME AND ADDRESS OF DOCTOR		(b) NAME AND ADDRESS OF HOSPITAL	
16. (a) HAS EMPLOYEE RETURNED TO WORK? ☐ Yes ☐ No	(b) IF YES, DATE		(c) AT WHAT WEEKLY WAGE?

NOTE: FORM C-11 MUST BE FILED EACH TIME THERE IS A CHANGE IN EMPLOYMENT STATUS

CAUSE OF ACCIDENT

17. WHAT WAS EMPLOYEE DOING WHEN INJURED? (Please be specific. Identify tools, equipment or material the employee was using.)

18. HOW DID THE ACCIDENT OR EXPOSURE OCCUR? (Please describe fully the events that resulted in injury or occupational disease. Tell what happened and how it happened. Plea separate sheet if necessary.)

19. OBJECT OR SUBSTANCE THAT DIRECTLY INJURED EMPLOYEE, e.g., the machine employee struck against or which struck him/her; the vapor or poison inhaled or swallowed, the che that irritated his/her skin. In cases of strains, the thing (s)he was lifting, pulling, etc.

FATAL CASES

20. (a) DATE OF DEATH	(b) NAME/ADDRESS OF NEAREST RELATIVE	(c) RELATIONSHIP

DATE OF THIS REPORT _____ SIGNED BY _____

DATE YOU OR SUPERVISOR FIRST KNEW OF INJURY _____ OFFICIAL TITLE _____

☐ CHECK BOX IF PREVIOUSLY REPORTED ON FORM C-2.1. TEL. NO. & EXT. _____

Revised 08/23/89

REXAM DSI FIRE INCIDENT REPORT

Plant: BROWNVILLE, NY Location Code: Dept.: _____
Machine/Area. _____ Incident Date: _____
Time: a.m. _____ p.m. _____

1. Ignition Sourcee: (check one)
   - ____ 800 Cutting and Welding
   - ____ 801 Electrical Defect/Short
   - ____ 802 Incendiarism (deliberately caused or set)
   - ____ 803 Smoking
   - ____ 804 Spontaneous Combustion
   - ____ 805 Static Electricity
   - ____ 806 Overheating
   - ____ 807 Combustion Explosion
   - ____ 809 Friction Heat
   - ____ 810 Hot Surfaces
   - ____ 811 Sparks from Machine
   - ____ 812 Lightning
   - ____ 999 Other _____

2. Contributing Cause: (check one)
   - ____ 01 Inadequate Controls
   - ____ 02 Dust
   - ____ 05 Flammable Liquids Leak or Spill
   - ____ 06 Housekeeping
   - ____ 07 Improper Procedure
   - ____ 08 Mechanical Failure
   - ____ 09 Poor Maintenance
   - ____ 10 Instrument Control Failure
   - ____ 11 Excessive Residue
   - ____ 12 Inadequate Ventilation
   - ____ 99 Other _____

3. Discovered by: (check one)
   - ____ A Alarm System
   - ____ B Employee
   - ____ C Outsider
   - ____ D Guard

4. Protection Provided (check one)
   - ____ A Sprinkled
   - ____ B NONE (if "none", skip #5 & #6)
   - ____ C Rack Storage, Roof Only Sprinkled
   - ____ D Rack Storage, Roof and Rack Sprinkled
   - ____ E FIXED System (Dry chem., CO2, Halon)
   - ____ Z Other _____

5. Number of Sprinklers Opened: (check one)
   - ____ 00 None Operated
   - ____ 01 1 head
   - ____ 02 2 heads
   - ____ 03 3 heads
   - ____ 04 4 heads
   - ____ 05 5 heads
   - ____ 06 6-10 heads
   - ____ 07 More than 10 heads

6. Protection Effectiveness: (check one)

____ A Extinguished
____ B Failed to Control
____ C Held in Check
____ D Operated, but not a factor
____ E Didn't Operate

7. Fire Extinguished by: (check one)

____ A FIXED System (Dry chem., CO2, Halon)
____ B Inside Hose Streams
____ C Outside Hose Streams
____ D Portable Extinguishers
____ E Sprinkler System
____ F Sprinklers In-Rack
____ Z Other _____

Did public fire department respond? _____
How were they called? _____
Was plant alarm sounded? _____
Did Plant Emergency Organization respond adequately? _____
Was fire confined to origin? _____
If not, why? _____
Who extinguished fire? _____
How? _____
Time to extinguish? _____
Portable extinguisher size & number used? _____
Fire hose size & number used? _____
Pressurized Water _____ Halon _____ Dry Chemical _____ CO2 _____
Was production interrupted? _____ How long and why? _____

PLEASE DESCRIBE WHAT HAPPENED: _____

Estimated Damage: Building $ _____ Machinery $ _____
Stock $ _____ Other $ _____
Corrective action taken: _____

Your Name: _____ Date of Report: _____
(please print)

DSI SPILL REPORT

Date of spill: _____ Time of spill: _____

Person Reporting Spill: _____

Material released: _____ Quantity released: _____

Duration of spill: _____ Location of spill: _____

Brief description of how the spill occurred: _____

_____

_____

Action taken to correct the situation: _____

_____

_____

Where is the spilled material now? How much ? (estimate)

Air	_____
Soil	_____
River	_____
Sewer	_____
Cleaned up and in containers	
Useable material	_____
Contaminated material	_____

Spill Reported To (FEC and/or Agency Names): _____
DEC Hotline (1-800-457-7362)_____
Spill report number:_____
Name of contact at Hotline:_____

_____

_____

Actions taken or recommendations to prevent recurrence:

_____

_____

This report is correct to the best of my knowledge and ability.

_____
Shift Foreman or FEC signature

_____
Date

cc: K. Kisner
S. Mercuri

NEW YORK STATE EMERGENCY RESPONSE COMMISSION

RELEASE REPORT FORM - SARA TITLE III SECTION 304

State Spill Hotline (800) 457-7362

Alternate # State Warning Point (518) 457-2200

1. Caller Name _____ Call Date _____

2. Affiliation _____ Time _____

3. Telephone _____ Ref. # _____

4. Material Released _____ _____ EHS: _____/_____
_____ CERCLA: _____/_____
(yes/no)

5. Amount Released _____ _____(lb - gal ?)

6. Date of Release _____ ___ Time _____ Duration _____(hrs,mins)

7. Release Medium: _____air _____water _____land

8. Weather Conditions: _____

9. Location of Release (St/Bldg #) _____
(City/County) _____

10. Facility Name and Address _____
_____
_____

11. EMERGENCY CONTACT (name): _____

12. Incident Description: _____
_____

13. Health Risks: _____

14. Precautions: _____

15. Additional Notifications made:

Local Fire Department	____yes	____no	_____time
Community Emergency Coordinator	____yes	____no	_____time
NYS Environmental Conservation	____yes	____no	_____time
Federal National Response Center	____yes	____no	_____time

16. Remarks, etc: _____

_____

_____

17. Form Completed By: (signature) _____

(title) _____

NATIONAL RESPONSE CENTER REPORTING FORM

Reporting Party:

Name _____

Address _____

_____

Telephone # _____

Party Responsible:

Name _____

Address _____

_____

Telephone # _____

Date and time of incident: _____

Specific location of incident: _____

_____

_____

Chemical Name: _____

CAS #: _____

Cause of release: _____

Total quantity of release: _____

Type of environmental release: _____

Weather conditions: _____

Vessel name, type, number or indentifying information: _____

Name of carrier: _____

Number and type of injuries or fatalities: _____

Have evacuations occured? _____

Status of other protective measures: _____

Estimated dollar amount of property damage: _____

Description of cleanup action taken and future plans: _____

Other agencies that you have notified or plan to immediately notify: _____

_____

SUN INSURANCE OFFICE OF AMERICA INC.

SELF-INSPECTION FORM FOR INDUSTRIAL PLANTS

INSTRUCTIONS:

This form should be filled out weekly by the person assigned to make the inspection in plant or property. Such inspections should not always be made by the same person. At least once a year department or tenant-area managers should accompany the inspector.

Turn in this report form promptly to the designated person.

If conditions are noted which require immediate attention and you cannot otherwise secure action, consult the plant manager at once.

If it is necessary to shut off the water to any sprinkler system, notify the plant manager immediately (in advance, if possible).

Name of inspector _____ Date _____

HOUSEKEEPING	Yes	No	N/A
Are suitable containers provided for waste materials and trash?	☐	☐	☐
Are there any combustible trash accumulations outside of proper containers?	☐	☐	☐
Are flammable liquids safely handled and stored?	☐	☐	☐
Are combustible packing materials kept in safe containers and is the packing area cleaned up at closing time?	☐	☐	☐
Is storage in warehouses orderly with ample aisle space?	☐	☐	☐
SMOKING			
Are there designated areas for smoking?	☐	☐	☐
Are "No Smoking" regulations enforced in restricted areas?	☐	☐	☐
ELECTRICAL EQUIPMENT			
Is there any temporary wiring?	☐	☐	☐
Are motors, fuse panels, and switch boxes clean?	☐	☐	☐
Is all wiring, including connections to junction boxes, panel boxes, equipment, etc., in good condition?	☐	☐	☐
FIRE DOORS AND FIRE EXITS			
Are all fire doors in good condition, operable, unobstructed, and not blocked open?	☐	☐	☐
Are automatic closing devices in operating condition?	☐	☐	☐
Are all fire exits unobstructed, including access to them and discharge from them?	☐	☐	☐
Are all fire exits clearly marked?	☐	☐	☐
GUARD SERVICE			
Do watch-clock records indicate that complete rounds are made as required?	☐	☐	☐
FIRE EXTINGUISHERS AND SMALL HOSE (1½ in.)			
Are all extinguishers properly charged and pressurized?	☐	☐	☐
Are all extinguishers and small hoses in good condition and readily accessible?	☐	☐	☐

SPRINKLER SYSTEM	Yes	No	N/A
Are all sprinkler control valves open?	☐	☐	☐
Are any sprinklers obstructed?	☐	☐	☐
Are there any areas where sprinklers are needed?	☐	☐	☐
Are there any areas where sprinklers may be subject to freezing?	☐	☐	☐
Do all sprinkler water flow alarms operate satisfactorily?	☐	☐	☐
Are any sprinkler heads painted, corroded, or loaded?	☐	☐	☐
Is air pressure adequate on all dry pipe sprinkler systems?	☐	☐	☐
Are all dry pipe valve enclosures heated sufficiently to prevent freezing?	☐	☐	☐
Record 2nd drain results on reverse side. Test Monthly.			
HYDRANTS			
Are all hydrants accessible and unobstructed?	☐	☐	☐
Are all hydrants in good operating condition and do they drain properly? *Test Annually.*	☐	☐	☐
WATER SUPPLIES			
Are all valves on connections to public water mains open?	☐	☐	☐
Public water pressure on gage, _____ psi.			
Are all fire pumps in good operating condition?	☐	☐	☐
Fire pumps turned over weekly?	☐	☐	☐
Is the gravity tank full?	☐	☐	☐
Adequately heated?	☐	☐	☐
Are valves from the gravity tank open?	☐	☐	☐
Is the fire pump suction tank or supply full?	☐	☐	☐
Adequately heated?	☐	☐	☐
Are all fire pump suction supply and discharge valves open?	☐	☐	☐

SUNALLIANCE
USA

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GENERAL IMPRESSIONS (Fill out this part last, after inspection is completed):

HOUSEKEEPING
(Check One):

- ☐ A very clean plant.
- ☐ There are a few places where things need to be cleaned up.
- ☐ Too many evidences of poor housekeeping.
- ☐ A mess!

FIRE PROTECTION
(Check One):

- ☐ All of the proper equipment is available and in good order, and everyone knows his or her fire duties.
- ☐ Some additional equipment and attention needed.
- ☐ Better maintenance and instruction needed.
- ☐ Much equipment lacking, not properly maintained, or people in plant not instructed in its use.

MAINTENANCE AND EQUIPMENT (Check One):

- ☐ Everything is in good order.
- ☐ A few unsafe spots.
- ☐ Quite a number of installations unsafe or not properly maintained.
- ☐ Immediate attention needed!

CONDITIONS REQUIRING ATTENTION (Identify location) _____

_____

_____

CORRECTIVE ACTION BEING TAKEN _____

_____

_____

SPRINKLER TEST RESULTS

Sprinkler Riser Number	Static Pressure Psi	Residual Pressure Psi	Local Alarm Operated Yes	Local Alarm Operated No	Alarm Received at Central Station Yes	Alarm Received at Central Station No

REXAM DSI
BROWNVILLE, NEW YORK

TANK ENTRY PERMIT

TANK TO BE ENTERED:_____

REASON FOR ENTRY:_____

DATE OF ENTRY:_____

TIME OF ENTRY: FROM:_____AM/PM TO:_____AM/PM

CONDITIONS REQUIRED PRIOR TO ENTRY - MARK WITH AN (X)

1) ALL FREE SOLIDS, LIQUIDS AND VAPORS REMOVED. ( )

2) ALL INCOMING PIPES BLANKED AND/OR DISCONNECTED. ( )

LIST:_____

3) NO NEARBY IGNITION SOURCES. (NO SMOKING, NO LIGHTERS) ( )

4) ELECTRICAL EQUIPMENT LOCKED OUT AND TAGGED ( )

LIST:_____

5) TANK IS CLEANED AND PURGED WITH FORCED AIR UNTIL:

A. REASONABLY ODOR FREE. ( )

B. OXYGEN LEVEL AT 19.5% OR ABOVE. RECORD LEVEL_____ ( )

6) TEMPERATURE INSIDE TANK. RECORD LEVEL_____ ( )

7) RESPIRATORY PROTECTIVE EQUIPMENT REQUIRED. ( )

EXPLAIN/LIST:_____

8) PERSONAL PROTECTIVE EQUIPMENT REQUIRED. ( )

EXPLAIN/LIST:_____

9) BUDDY PRESENT AT TANK. NAME_____ ( )

SIGNATURE OF PERSONS ENTERING TANK (INDICATES ALL ABOVE MARKED CONDITIONS ARE MET).

_____

AUTHORIZED BY (SUPERVISOR):_____

MANAGER OF ENVIRONMENTAL AFFAIRS:_____

DATE:_____

NOTE: NO TANK MAY BE ENTERED WITHOUT A PERMIT.
A COPY OF THE PERMIT TO BE FILED WITH MANAGER OF ENVIRONMENTAL AFFAIRS.
A NEW PERMIT IS REQUIRED FOR EACH WORK DAY.

WEEKLY FIRE SAFETY INSPECTION

AREA: _____ DATE: _____

				Remarks
1. Fire doors operable?	N/A	Yes	No	_____
2. Emergency exits accessible, clearly marked?	N/A	Yes	No	_____
3. Hoses, eyewashes, showers accessible, clearly marked?	N/A	Yes	No	_____
4. Eyewashes, showers tested?	N/A	Yes	No	_____
5. Fire extinguishers accessible, sealed?	N/A	Yes	No	_____
6. Emergency equipment (Scott Air-Pak, stretchers, etc.) accessible, neatly stored?	N/A	Yes	No	_____
7. Emergency lights unobstructed, tested?	N/A	Yes	No	_____
8. Manual CO_2 operators accessible, clearly marked?	N/A	Yes	No	_____
9. All electric panels closed and accessible?	N/A	Yes	No	_____
10. Housekeeping acceptable?				
a. Aisles marked, free of stock, uncluttered?	N/A	Yes	No	_____
b. Any solvent/lacquer leaks, spills?	N/A	Yes	No	_____
c. Broke carts overfilled?	N/A	Yes	No	_____
d. Open containers of solvent or lacquer?	N/A	Yes	No	_____
e. Conductive floors clean of lacquer?	N/A	Yes	No	_____

SAFETY TRAINING VIDEOS

NAME OF VIDEO

STOP PROGRAM:

1 - OVERVIEW

2 - INTRODUCTION
REACTION OF PEOPLE
USING THE STOP PROGRAM

3 - PERSONAL PROTECTIVE EQUIPMENT
TOOLS AND EQUIPMENT

4 - POSITIONS OF PEOPLE
PROCEDURES AND OUTLINES

HEARING PROTECTION

HAND SAFETY

MINIMIZING BACK STRAIN

HAZARDOUS MATERIAL

HAZARDOUS COMMUNICATION TRAINING
PLUS COMPLIANCE

BACK INJURY

SLIPS AND FALLS

FIRE EXTINGUISHER TRAINING

CONFINED SPACE ENTRY RETRAINING

RADIATION SAFETY & COMMON SENSE

FORKLIFT SAFETY

EYE PROTECTION

BLOODBORN PATHOGENS

ISO FILM

REXAM DSI
BROWNVILLE
FIRE EXTINGUISHER
LOCATION MAP

FIRE EXTINGUISHER LOCATIONS

MAIN FLOOR

EXT. #'S	AREA	TYPE
F-101	BOLT ROOM CAGE	10 # CO 2
F-102	PLANT ENGINEER'S OFFICE	10 # CO 2
F-103	SWITCH GEAR PULPER AREA	10 # CO 2
F-104	BOILER ROOM (DEAERATOR)	5# CO 2
F-105	BOILER ROOM – BEHIND OIL BOILER	WATER
F-106	BOILER ROOM BY SINK	10 # DRY CHEMICAL
F-107	BOILER ROOM OFFICE	10 # CO 2
F-108	HALLWAY BY OVERHEAD DOOR	10 # CO 2
F-109	BLACKSMITH SHOP	20 # CO 2
F-110	WALL BY CLAY DISPERSION TANK	10 # DRY CHEMICAL
F-111	INSPECTION WINDER	7 # DRY CHEMICAL
F-112	SIDE ENTRANCE BY DRIVEWAY	WATER
F-113	ENTRANCE TO 50% LAB BY LUNCH ROOM	5# CO 2
F-114	50% LAB	5# CO 2
F-115	65% LAB	5# CO 2
F-116	#1 MACHINE WINDER BACKSTAND	20 # DRY CHEMICAL
F-117	#1 MACHINE WINDER BACKSTAND	WATER
F-118	#1 MACHINE REEL (BY DRIVE COUPLING)	10 # CO 2
F-119	#1 MACHINE BACKTENDERS TABLE	10 # HALON
F-120	SATURATOR - RIVERSIDE WALL	10 # DRY CHEMICAL
F-121	SATURATOR - RIVERSIDE WALL	10 # DRY CHEMICAL
F-122	SATURATOR - RIVERSIDE WALL	10 # DRY CHEMICAL
F-123	BEHIND 3RD SECTION - RACK	WATER
F-124	BEHIND 3RD SECTION - RACK	5 # CO 2
F-125	BEHIND 3RD SECTION - RACK	WATER
F-126	BEHIND 3RD SECTION - RACK	10 # CO 2
F-127	BEHIND 3RD SECTION - RACK	WATER
F-128	BEHIND 3RD SECTION - RACK	WATER
F-129	BEHIND 3RD SECTION - RACK	WATER
F-130	BEHIND 3RD SECTION - RACK	5# CO 2
F-131	BEHIND 3RD SECTION - RACK	WATER
F-132	BEHIND 3RD SECTION - RACK	WATER
F-133	2ND SECTION BOILING VAT (POLE)	10 # DRY CHEMICAL
F-134	OLD #2 SIDE WINDER AREA (BY LAB OVEN)	10 # DRY CHEMICAL
F-135	OLD #2 SIDE BY COATER STACK CONTROLS	WATER
F-136	PILLAR BEHIND MACHINE (1ST SECTION)	10 # DRY CHEMICAL
F-138	BEHIND 1ST SECTION - RACK	WATER
F-139	INSIDE PRODUCT DEVELOPEMENT LAB	20 # DRY CHEMICAL
F-140	INSIDE PRODUCT DEVELOPEMENT LAB	20 # DRY CHEMICAL
F-143	#1 MACHINE WET END - RIVERSIDE WALL	10 # DRY CHEMICAL
F-144	MEN'S LOCKER ROOM	WATER
F-146	BEHIND 1ST SECTION - RACK	WATER
F-147	BEHIND 1ST SECTION - RACK	WATER

REXAM DSI
BROWNVILLE
FIRE EXTINGUISHER
LOCATION MAP

MAIN FLOOR - CONTINUED

EXT. #'S	AREA	TYPE
F-148	BEHIND 1ST SECTION - RACK	WATER
F-149	BEHIND 1ST SECTION - RACK	10 # CO 2
F-150	BEHIND 1ST SECTION - RACK	WATER
F-152	BEHIND 1ST SECTION - RACK	WATER
F-154	PULPER AREA BY WATER FOUNTAIN	10 # DRY CHEMICAL
F-155	PILLAR BEHIND #1 MACHINE WET FELT	10 # CO 2
F-156	ENTRANCE TO MEASUREX ROOM	10 # DRY CHEMICAL
F-158	BEHIND 1ST SECTION - RACK	WATER
F-159	COATER - PILLAR BY OVEN CONTROLS	10 # DRY CHEMICAL
F-160	OUTSIDE WALL OF PRODUCT DEVELOPEMENT LAB	10 # DRY CHEMICAL
F-161	COATER - PLATFORM OVER STATION # 3	10 # CO 2
F-162	COATER - PLATFORM OVER STATION # 3	10 # CO 2
F-163	COATER OVENS- KADY MILL PLATFORM	10 # CO 2
F-164	COATER OVENS- KADY MILL PLATFORM	10 # CO 2
F-173	LUNCH ROOM	20 # DRY CHEMICAL
F-174	OFFICE AREA BY 50% LAB	20 # DRY CHEMICAL
F-184	COATER - LATEX STORAGE TANK AREA	20 # DRY CHEMICAL

2 ND FLOOR

EXT. #'S	AREA	TYPE
F-201	RIVER WALL BY WET FELT	20 # CO 2
F-202	OIL ROOM ENTRANCE	20 # DRY CHEMICAL
F-203	PILLAR BY OIL DRUMS	20 # CO 2
F-204	BEHIND ELEVATOR BY SLUDGE TANKS	WATER
F-205	RAMP ROOM	10 # DRY CHEMICAL
F-206	RAMP ROOM	WATER
F-207	PILLAR BY # 2 PULPER	10 # CO 2
F-208	STAIRWELL BY AIR DRYER	WATER
F-209	ENTRANCE TO AIR COMPRESSOR ROOM	20 # DRY CHEMICAL
F-210	ENTRANCE TO BOILER FEED PUMPS	20 # DRY CHEMICAL
F-211	ENTRANCE TO AIR COMPRESSOR ROOM	20 # CO 2

3 RD FLOOR

EXT. #'S	AREA	TYPE
F-301	STAIRWELL	WATER
F-302	STAIRWELL	10 # CO 2
F-303	ENTRANCE TO WATER PIT	WATER
F-304	FIRE PUMP ROOM	20 # CO 2
F-305	SAND FILTER - OLD BOILER ROOM	20 # CO 2
F-306	TOP OF STAIRS - BY SWITCH GEAR ROOM	10 # DRY CHEMICAL
F-307	SWITCH GEAR - BY # 6 FUEL OIL PUMPS	20 # DRY CHEMICAL
F-308	TANK FARM	20 # DRY CHEMICAL
F-309	TANK FARM	20 # DRY CHEMICAL

REXAM DSI
BROWNVILLE
FIRE EXTINGUISHER
LOCATION MAP

4 TH FLOOR

EXT. #'S	AREA	TYPE
F-401	BY WATER PUMPS	20 # CO 2

WAREHOUSE AREA

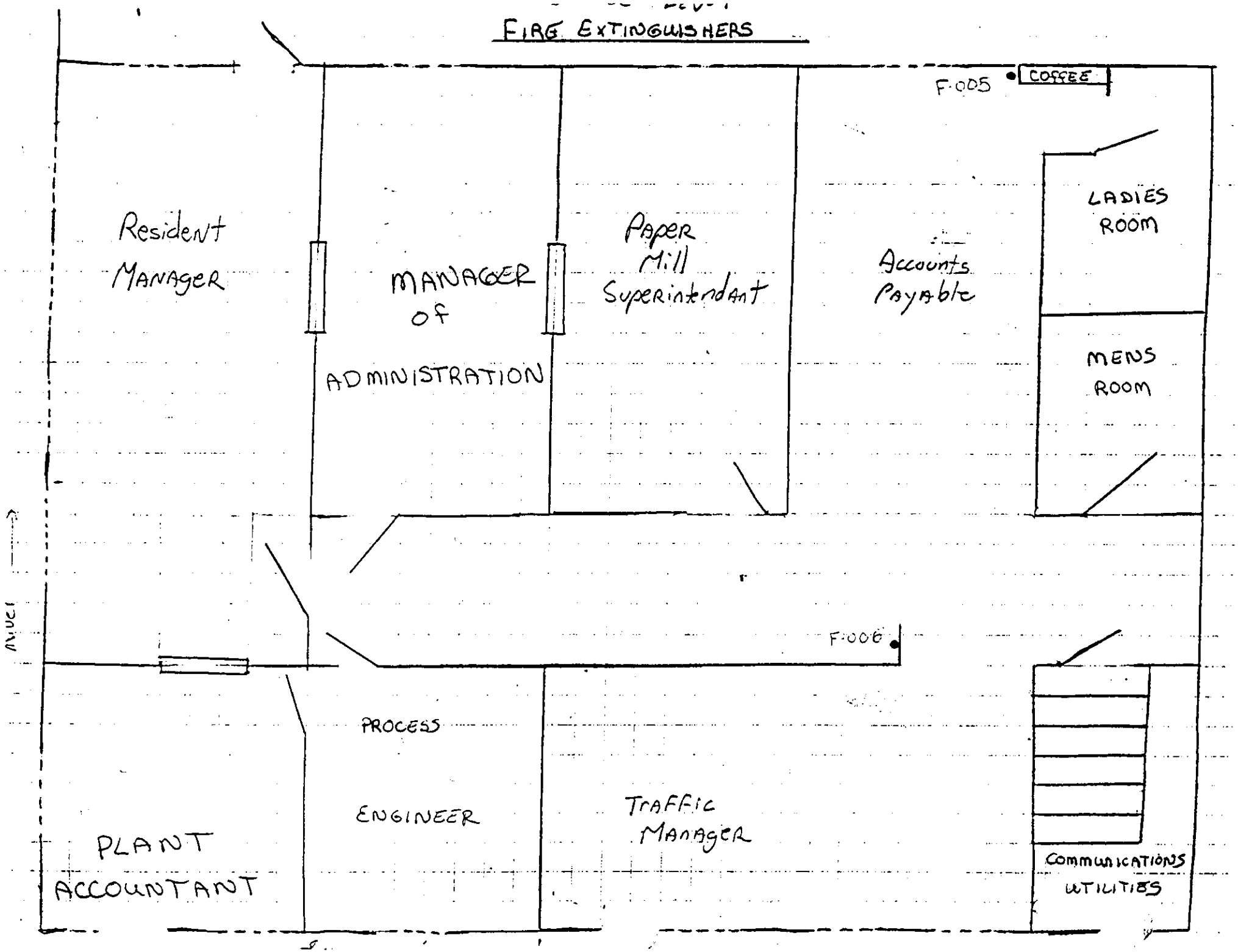
EXT. #'S	AREA	TYPE
F-142	HEATED WAREHOUSE SAMPLE ROOM	WATER
F-145	ENTRANCE TO RECORDS STORAGE ROOM	5 # DRY CHEMICAL
F-165	HEATED ROOM - BY PUNCH CLOCK	20 # DRY CHEMICAL
F-166	OUTSIDE CONFERENCE ROOM	WATER
F-167	CONFERENCE ROOM	10 # DRY CHEMICAL
F-168	CARPENTER SHOP	20 # DRY CHEMICAL
F-169	CARPENTER SHOP	20 # DRY CHEMICAL
F-170	LOADING DOCK	10 # DRY CHEMICAL
F-171	LOADING DOCK WAREHOUSE	10 # DRY CHEMICAL
F-172	CORNER WAREHOUSE - EXIT BY STOP SIGN	WATER

ROOF & MAIN OFFICE

EXT. #'S	AREA	TYPE
F-001	OUTSIDE ELEVATOR ROOM	10 # DRY CHEMICAL
F-002	OUTSIDE STUFF BOX ROOM	10 # CO 2
F-003	P.V. SYSTEM PLATFORM	20 # DRY CHEMICAL
F-005	MAIN OFFICE BY LADIES ROOM	10 # CO 2
F-006	MAIN OFFICE BY MAIL BOXES	10 # HALON

LIFT TRUCKS

EXT. #'S	TRUCK #	TYPE
F-175	# 4 TOYOTA (FORK)	2.5 # DRY CHEMICAL
F-176	# 5 SM. CLARK (FORK)	2.5 # DRY CHEMICAL
F-177	# 7 LG. YALE (FORK)	2.5 # DRY CHEMICAL
F-178	# 2 YALE (CLAMP)	2.5 # DRY CHEMICAL
F-179	# 3 LG. CLARK (FORK)	2.5 # DRY CHEMICAL
F-180	# 1 CLARK (CLAMP)	2.5 # DRY CHEMICAL
F-181	# 8 YALE (FORK) EDMOND ST.	2.5 # DRY CHEMICAL
F-182	# 6 YALE (FORK) CELLAR TRUCK	2.5 # DRY CHEMICAL
F-183	MILL TRUCK (FLAT BED)	2.5 # DRY CHEMICAL


FIRE EXTINGUISHERS
F-005
COFFEE
Resident Manager
MANAGER of ADMINISTRATION
Paper Mill Superintendant
Accounts Payable
LADIES ROOM
MENS ROOM
F-006
PROCESS ENGINEER
PLANT ACCOUNTANT
TRAFFIC MANAGER
COMMUNICATIONS UTILITIES

...compliance with the orderly progress of the job.

THE HARTFORD SUPERVISOR'S INVESTIGATION REPORT

Name	Age	Time	Date

Department — Shift	Job	How long on this job?

WHAT HAPPENED?

Describe what took place or what caused you to make this investigation.

WHY DID IT HAPPEN?

Get all the facts by studying the job and situation involved.
Question by use of WHY — WHAT — WHERE — WHEN — WHO — HOW

WHAT SHOULD BE DONE?

Determine which of the 12 items under EMP require additional attention.

Equipment	Material	People
Select	Select	Select
Arrange	Place	Place
Use	Handle	Train
Maintain	Process	Lead

WHAT HAVE YOU DONE THUS FAR?

Take or recommend action, depending upon your authority. Follow up – was action effective?

HOW WILL THIS IMPROVE OPERATIONS?

OBJECTIVE
Eliminate job hindrances

INVESTIGATING COMMITTEE (See Reverse Side)

Immediate Supervisor _____ Department Head _____

Injured Employee _____ Safety Department _____

Safety committeeperson _____ Others _____

Shop Steward _____

Report to be completed by Immediate Supervisor and turned in not later that the following day. All Lost Workday(s) Injuries or Fatalities are to be promptly reported to Headquarters Health and Safety. NOTE: All Fatalities and certain serious accidents must be reported to the appropriate Federal or State Agency enforcing OSHA regulations. Check applicable regulations for specific reporting requirements.

Were There Any Witnesses To The Accident? ☐ Yes or ☐ No. If "Yes" Name _____

Did Employee Receive First Aid treatment At The Mill? ☐ Yes or ☐ No. If Yes, What First Aid Treatment Was Performed? _____

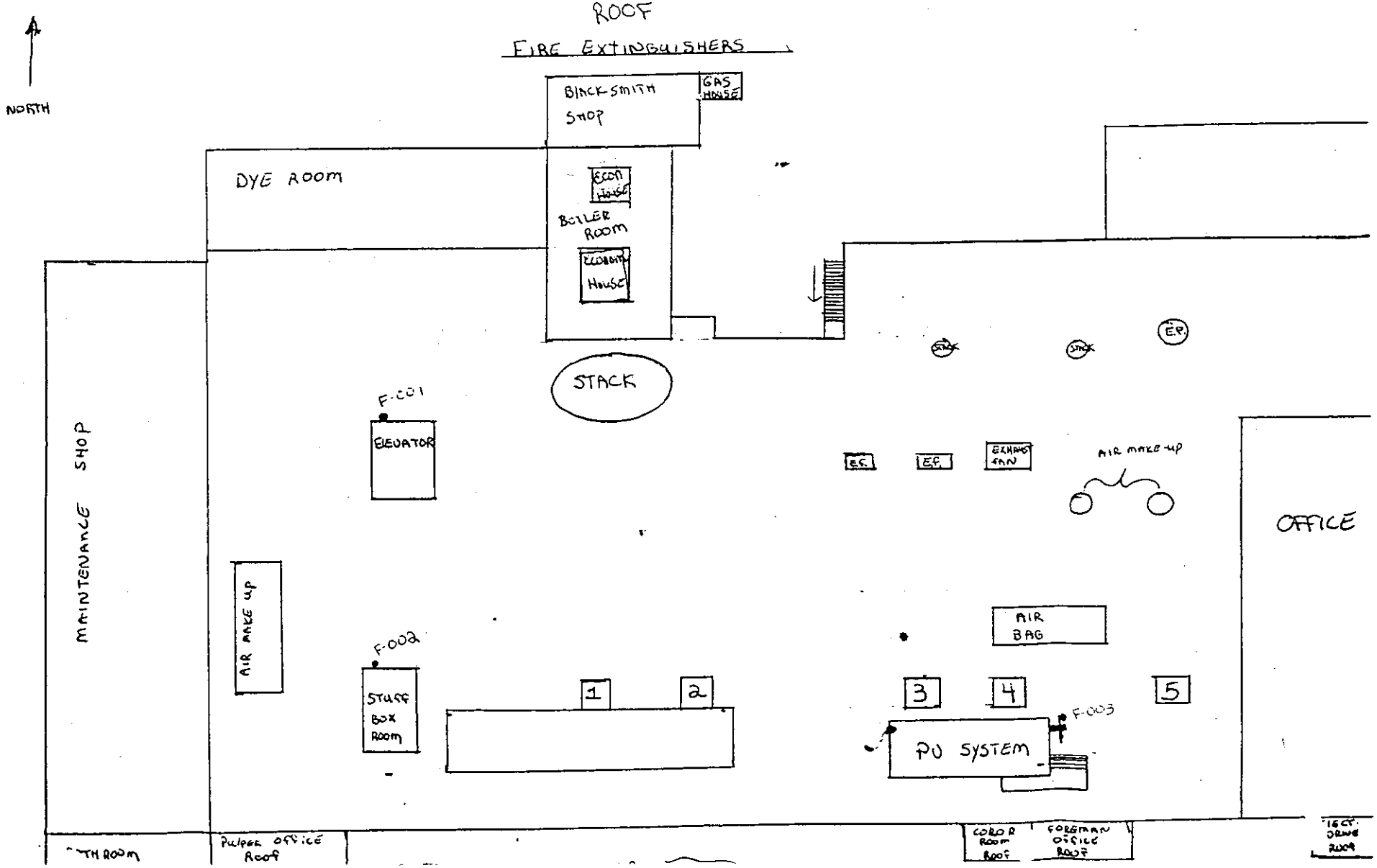
Did Employee Go To A Hospital? ☐ Yes or ☐ No. If Yes, Name Of Hospital _____

Name Of Doctor _____

What Medical Services Were Performed At The Hospital? _____

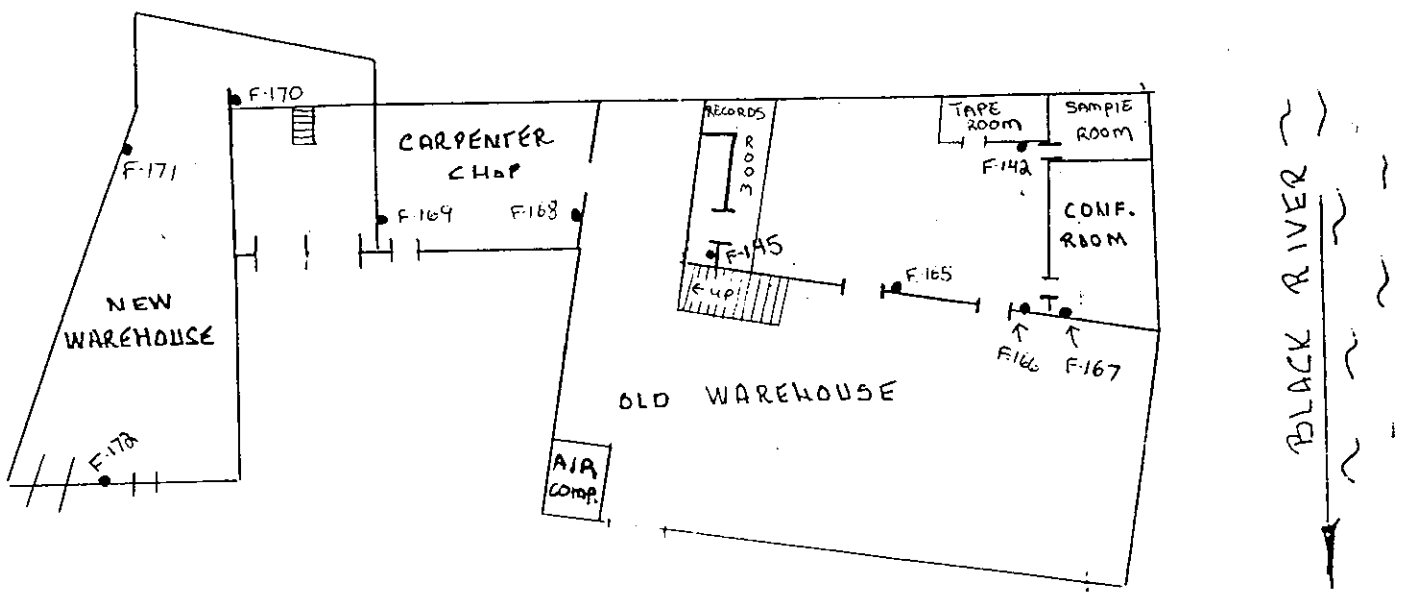
Is The Employee Restricted To Light Duty Work At The Mill? ☐ Yes or ☐ No. If Yes, How Long.

Is The Employee Restricted for _____ Days.

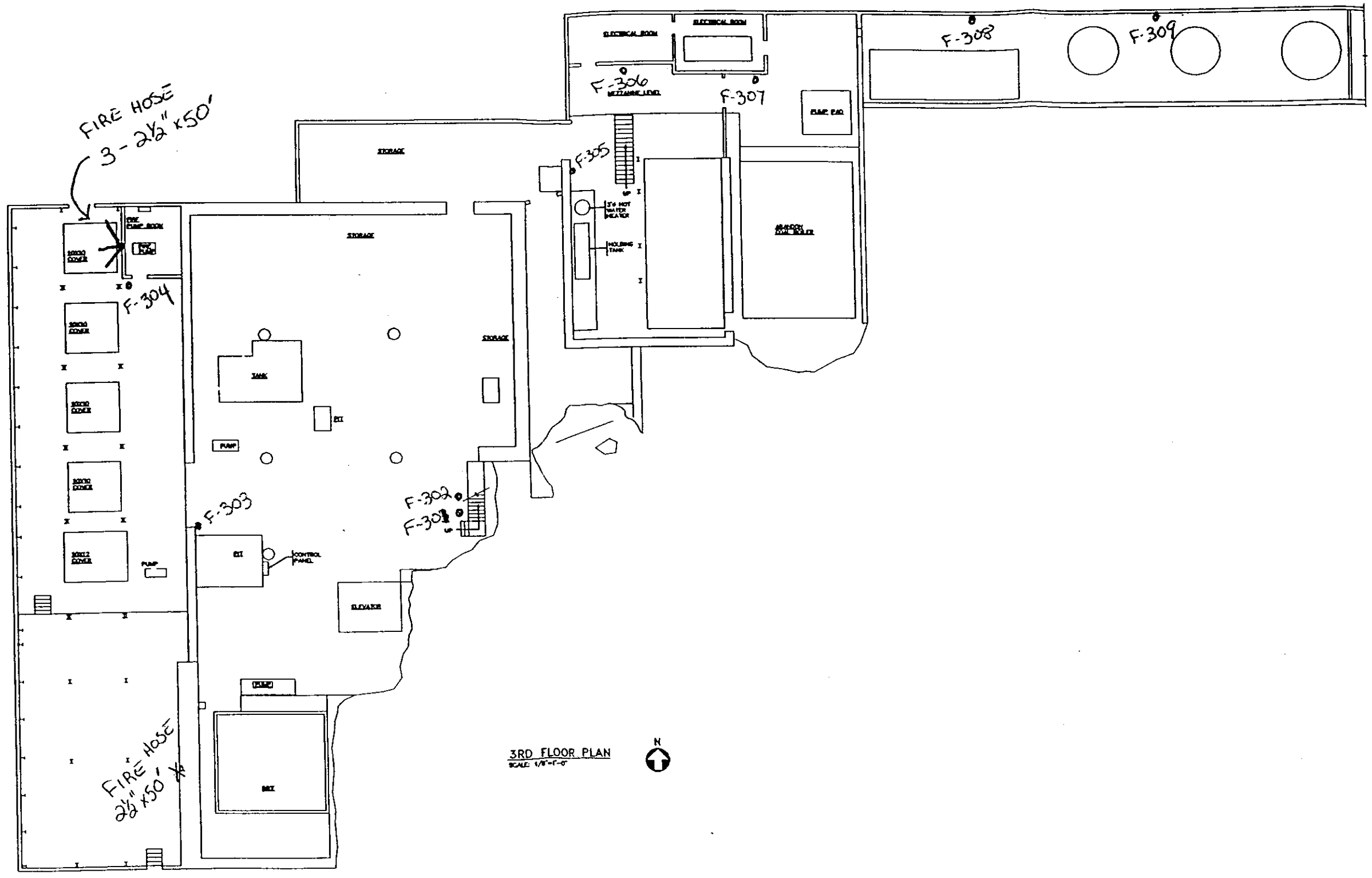

ROOF
FIRE EXTINGUISHERS
NORTH
BLACK-SMITH SHOP
GAS HOUSE
DYE ROOM
ECON HOUSE
BOILER ROOM
ECONOMY HOUSE
STACK
F-001
ELEVATOR
MAINTENANCE SHOP
AIR MAKE UP
F-002
STUFF BOX ROOM
1
2
EXHAUST FAN
AIR MAKE-UP
OFFICE
AIR BAG
3
4
5
F-003
PU SYSTEM
PULPER OFFICE ROOF
COLOR ROOM ROOF
FOREMAN OFFICE ROOF

NORTH

FIRE EXTINGUISHERS



JAMES RIVER - PREMOID
BROWNVILLE N.Y.
WARE JCE



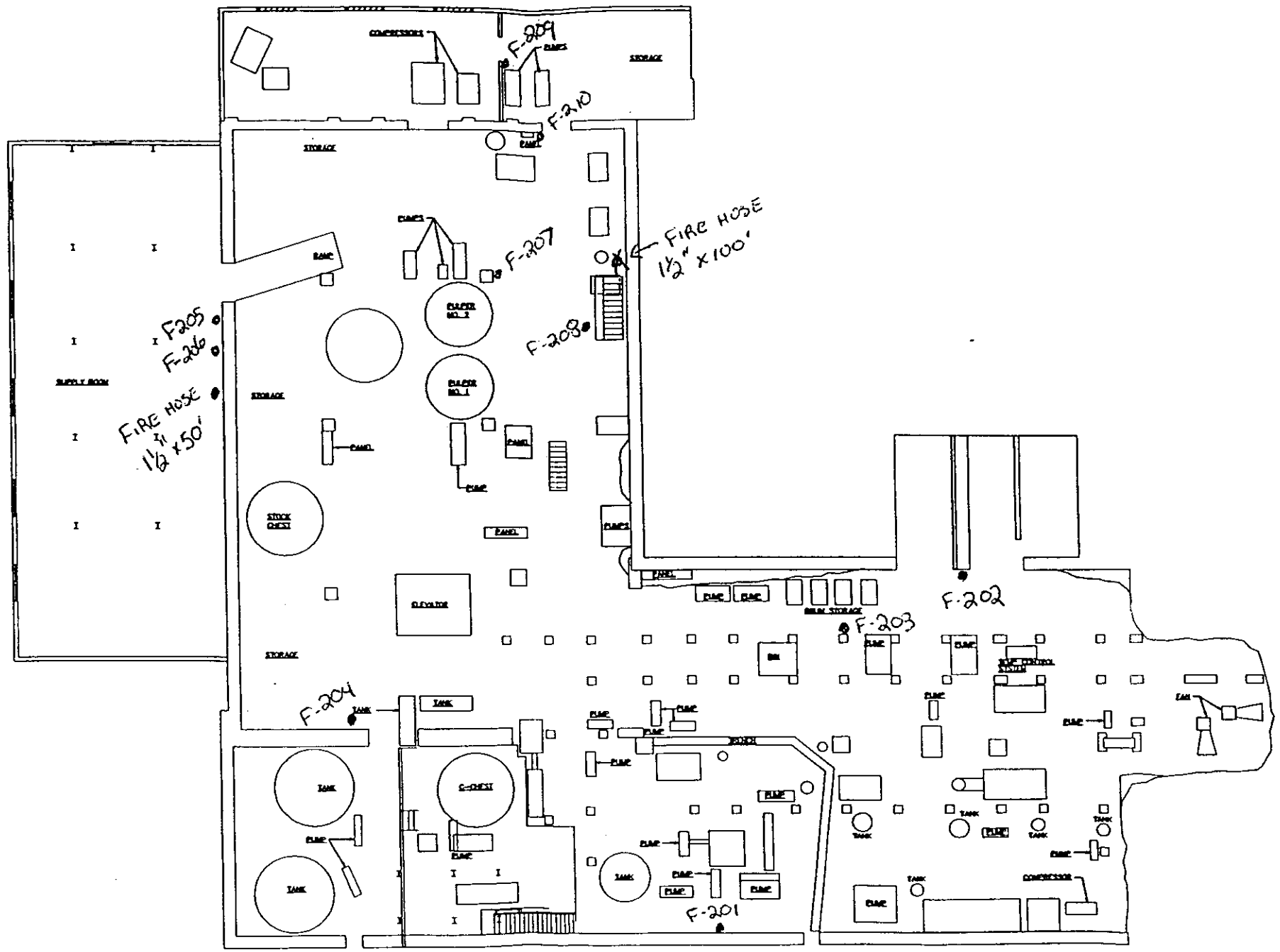
3RD FLOOR PLAN
SCALE: 1/8"=1'-0"

N

KEY PLAN

N

REXAM DSI
BRIDGE ST. BROWNSVILLE, N.Y. 1
PROJECT:
REXAM DSI RENOVATIONS
DRAWING:
3RD FLOOR PLAN
INTERFACE SERVICES, INC.



2ND FLOOR PLAN
SCALE: 1/8"=1'-0"

N

KEY PLAN

N

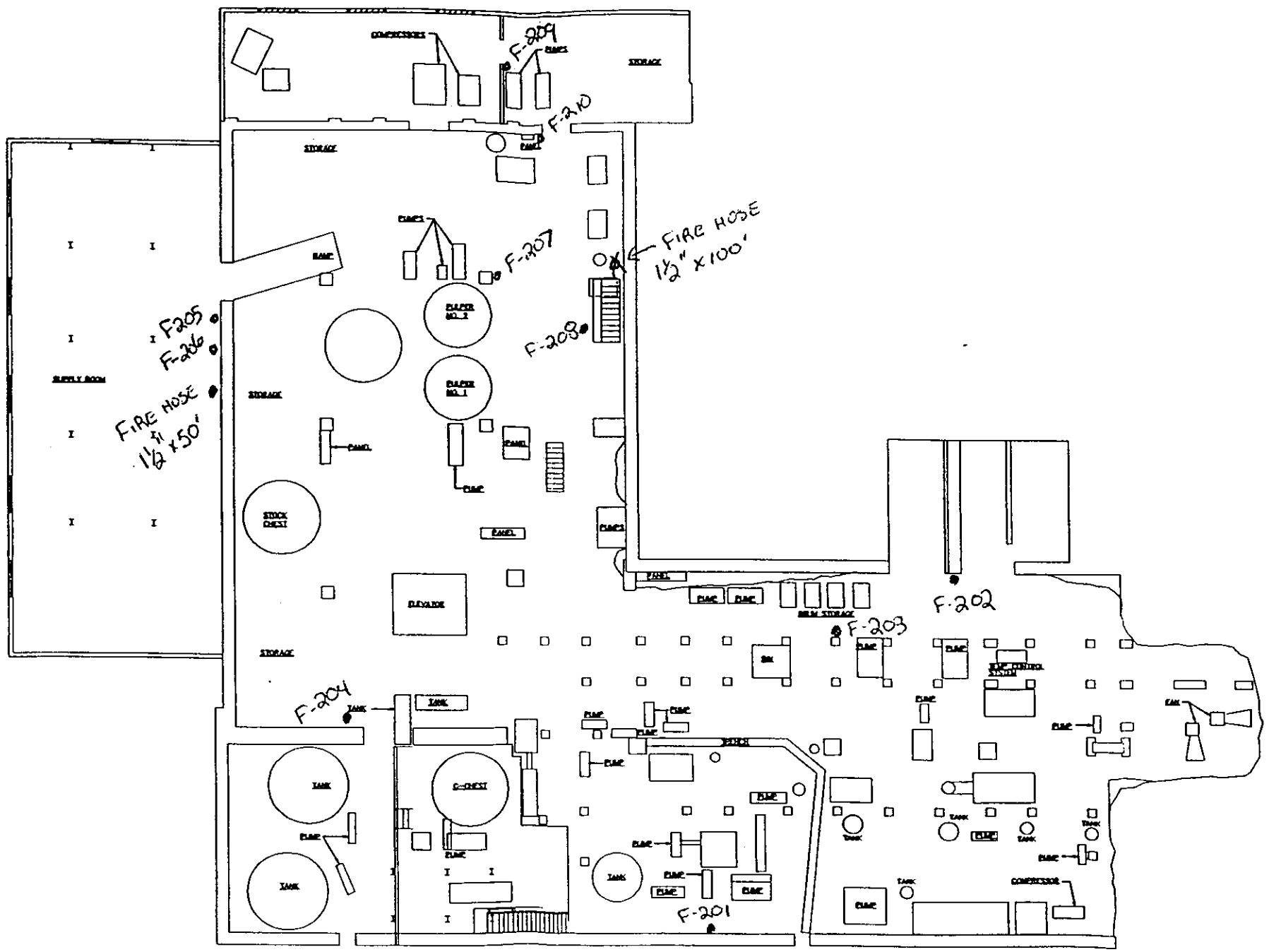
REVISIONS

INTERFACE SERVICES, INC.

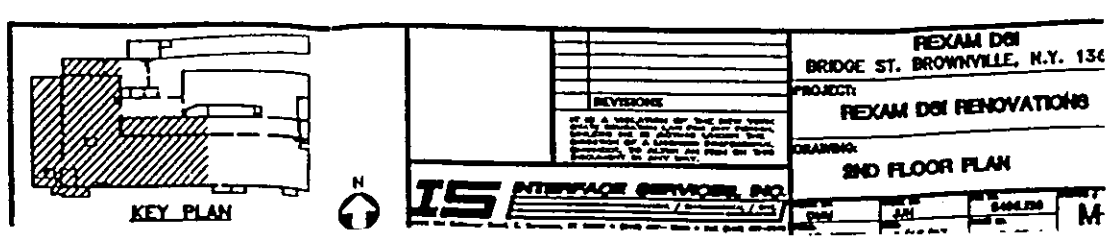
REXAM DBI
BRIDGE ST. BROWNVILLE, N.Y. 13

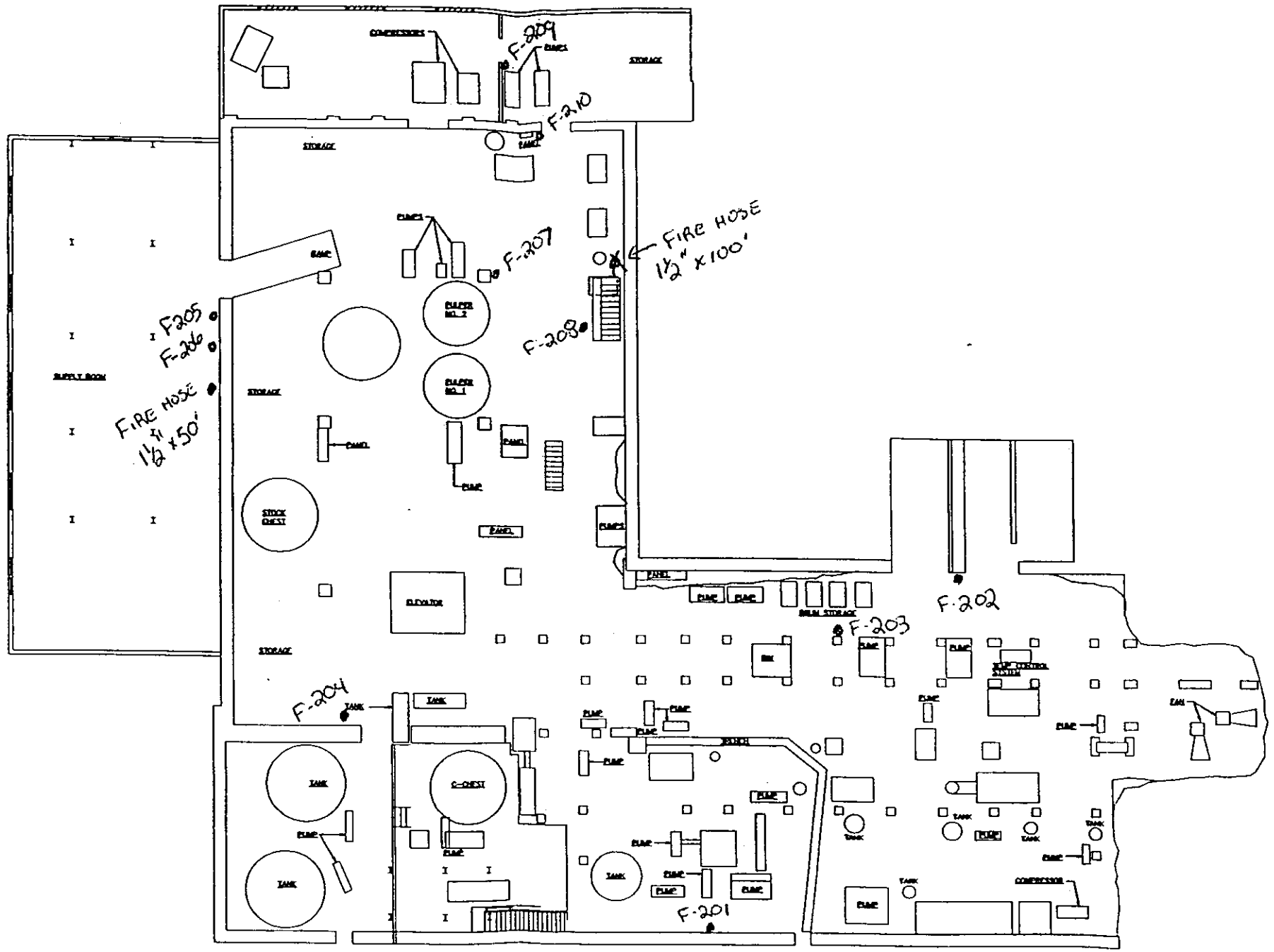
PROJECT:
REXAM DBI RENOVATIONS

DRAWING:
2ND FLOOR PLAN

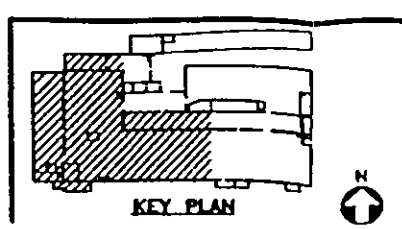


2ND FLOOR PLAN
SCALE: 1/8"=1'-0"





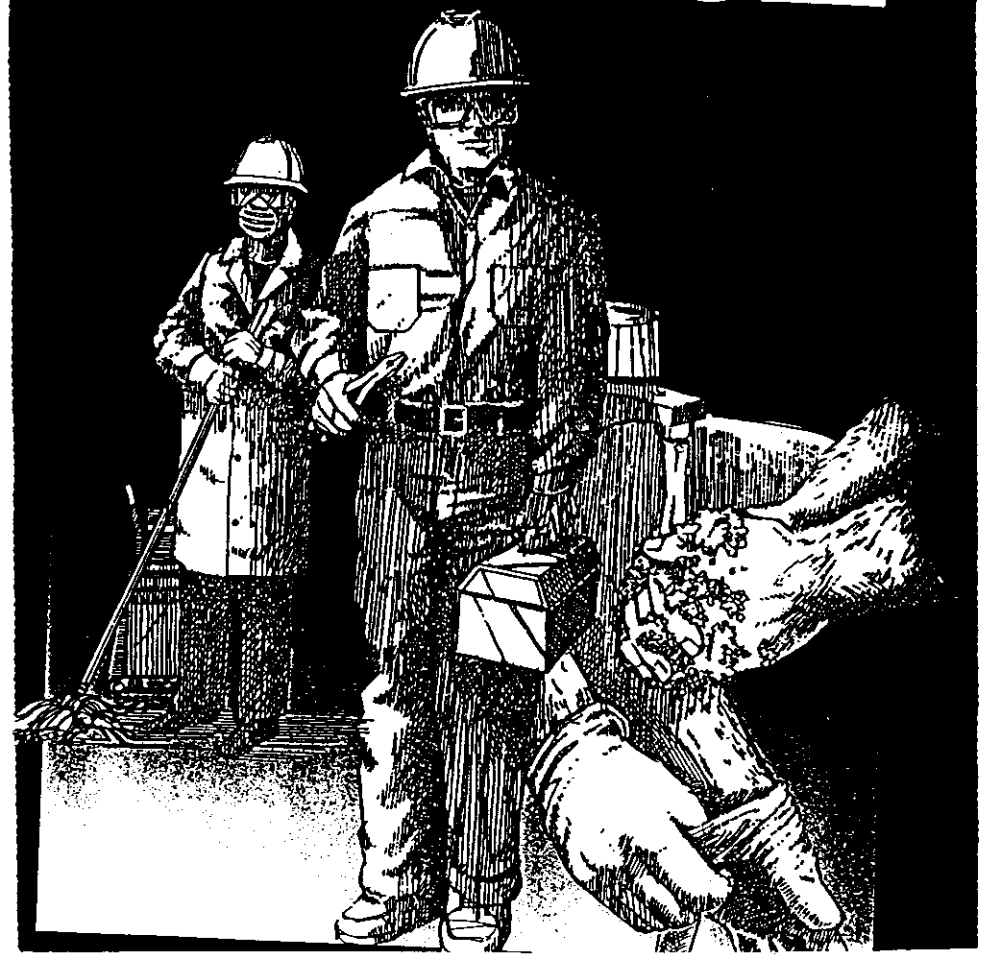
2ND FLOOR PLAN
SCALE: 1/8"=1'-0"



REXAM DSI
BRIDGE ST. BROWNVILLE, N.Y. 13
PROJECT:
REXAM DSI RENOVATIONS
DRAWING:
2ND FLOOR PLAN
REVISIONS
INTERFACE SERVICES, INC.

Bloodborne Pathogens Awareness

Protect Yourself



Protect Yourself

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HIV

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Introduction

It used to be, you could come to the rescue of a co-worker without giving much thought to your own safety. Today it's not always that easy. Deadly diseases can stand between you and acts of heroism. Diseases like the hepatitis B virus (HBV) and the human immunodeficiency virus (HIV), which causes AIDS. Although there are many diseases carried by blood, it's important to know about these two.

Bloodborne Diseases

HBV

Hepatitis B virus (HBV) is a virus which causes liver disease. HBV may severely damage your liver, leading to cirrhosis and almost certain death. It is a bigger threat than AIDS because it is a more common bloodborne pathogen.

If you become infected with HBV:

- You may feel like you have the flu.
- You may be so sick you have to be hospitalized.
- Your blood, saliva and other body fluids may be infectious.

You may be vaccinated prior to or immediately after exposure to help prevent HBV infection.

HIV

Today, almost everyone has heard of AIDS, or Acquired Immune Deficiency Syndrome. It is a serious illness caused by HIV.

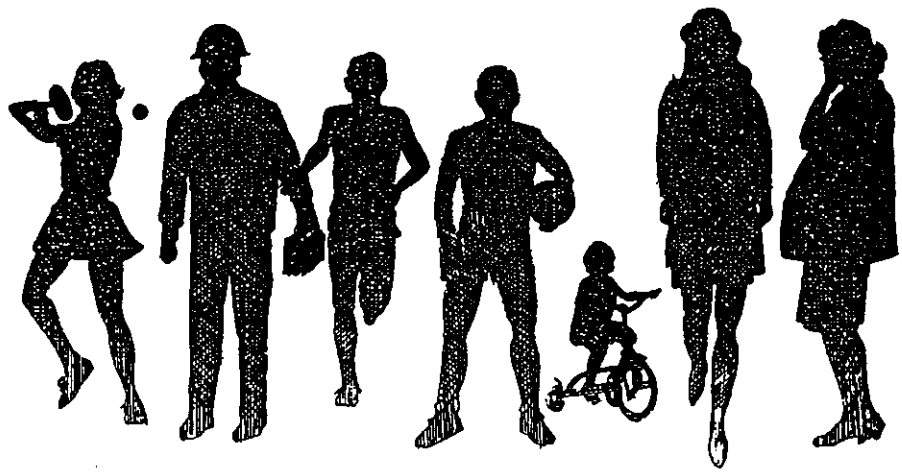
HIV is transmitted primarily through sexual contact, but may also be transmitted through contact with blood and certain body fluids. Sooner or later, most people infected with HIV will get AIDS. They become unable to fight infections and other diseases. Worst of all, AIDS can't yet be cured.

Who Has HIV and HBV?

All kinds of people have HBV and HIV. In the United States there are about 300,000 people infected with HBV annually. There are another 35,000 infected with HIV.

You can't always tell who they are by looking at them. They can be old or young, male or female, married or single. They can be from an inner city or a small town.

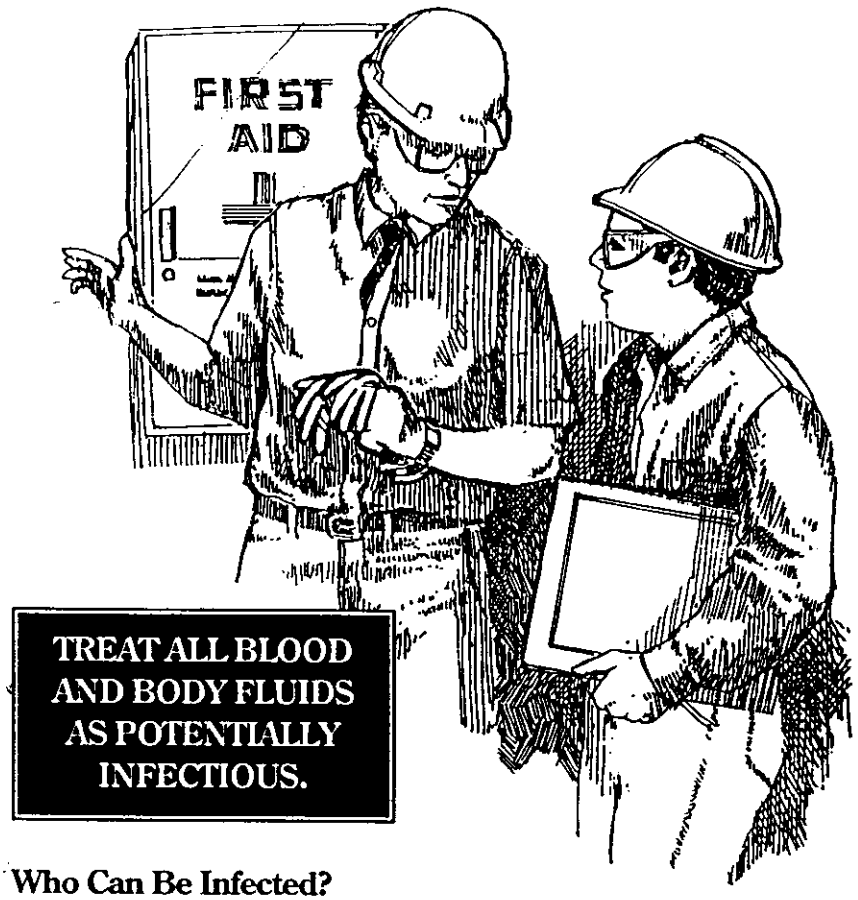
To make things worse, they may not even know they are infected. People can carry either disease for many years while looking and feeling healthy. Their blood and body fluids may be highly contagious, so they can unknowingly spread the diseases to others.



Universal Precautions

Health experts say the only safe thing to do is use Universal Precautions. This means treating **all** blood or body fluids as potentially infectious.

You can't identify every person who may transmit infection. Yet you can't afford to take any chances, since it takes just one exposure to become infected.



Who Can Be Infected?

Perhaps you are thinking, "I don't have to worry about AIDS or hepatitis B when my co-worker is in danger. No one I work with has either of those diseases." Unfortunately, you have no way of knowing, so you must be concerned for your own safety.

The fact is, AIDS and hepatitis B are threats to your health whether you think about it or not. The better you understand the risks, the easier it is to protect yourself and your co-workers on the job.

Fortunately, AIDS and hepatitis B aren't spread through the air like cold or flu germs. You won't get either disease from working alongside someone who is infected or from casual contact.

Workplace Transmission

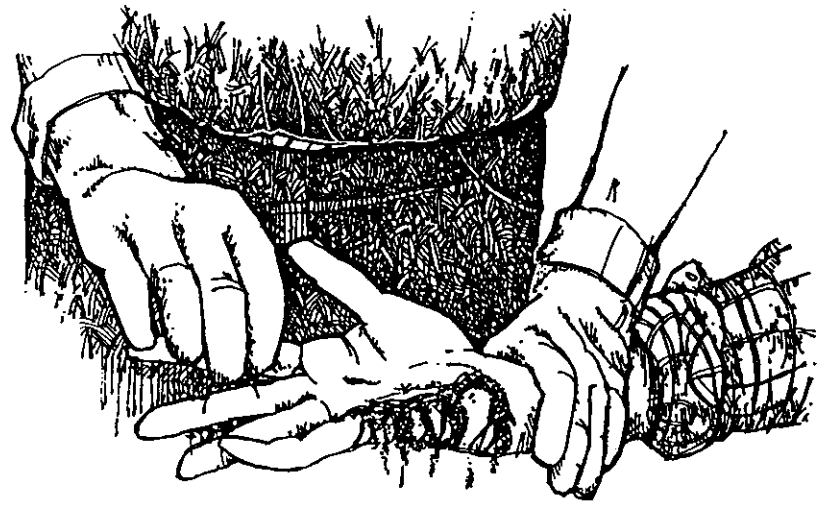
In the workplace, bloodborne pathogens are transmitted in the same ways. HBV, HIV and other pathogens may be present in:

- Blood, vaginal secretions, semen and certain other body fluids
- Unfixed tissues or organs other than intact skin.

Means of Transmission

But the virus must first get inside your body. You can become infected by:

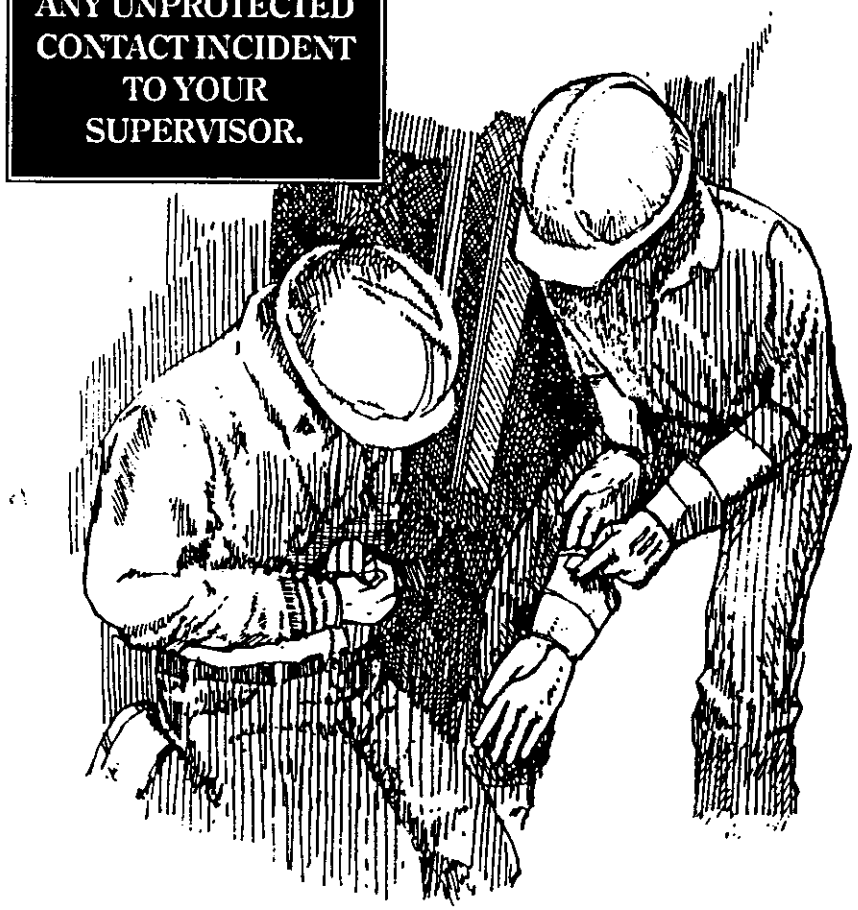
- Sexual contact with an infected partner
- Sharing infected needles
- Accidentally cutting yourself with a sharp object that is contaminated with infected blood or body fluids
- Getting infected blood or body fluids on your skin, especially if your skin has open sores, nicks or cuts
- Getting contaminated blood or body fluids in the mucous membranes of your eyes, nose or mouth.



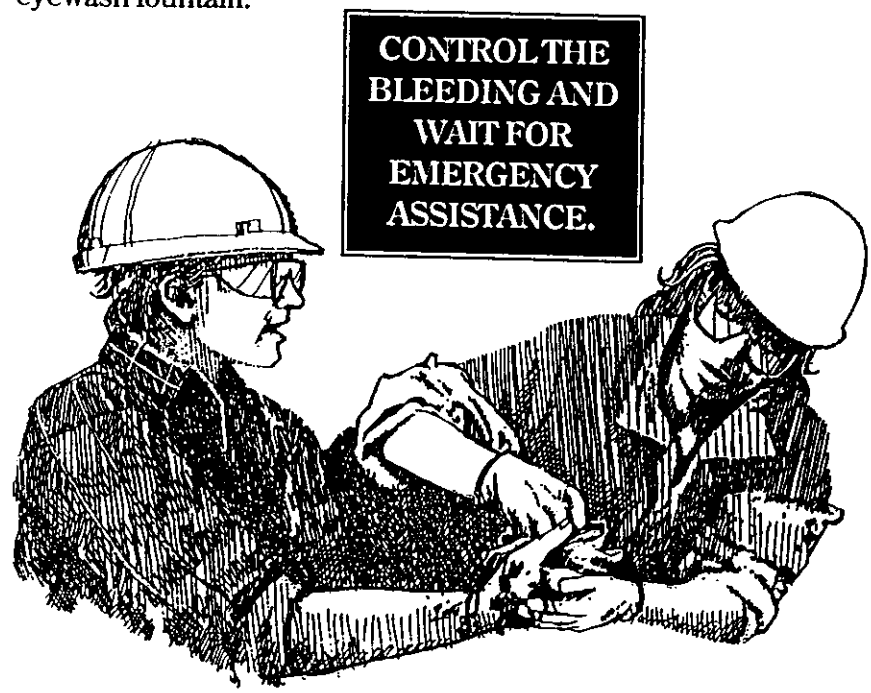
Normally, your skin acts as a protective barrier to keep viruses out. But even tiny breaks or cracks in the skin from common conditions like dermatitis, acne, chapping and broken cuticles can be doorways for the HIV or HBV viruses to enter your body.

Always remember, if you are not trained in first aid, make as little contact as possible with the injured worker. If the injured worker is bleeding, leave on all regular personal protective equipment and get a pair of leak-proof gloves to wear under your work gloves. This may seem trivial, but wearing leak-proof gloves could save your life.

ALWAYS REPORT ANY UNPROTECTED CONTACT INCIDENT TO YOUR SUPERVISOR.



If you do get blood or other potentially infectious materials on your skin, immediately wash with non-abrasive soap and water. If your mucous membranes of your eyes, nose and mouth are exposed, immediately flush with running water at a sink or eyewash fountain.



If you choose to help an injured worker, focus on stopping the bleeding. Once the bleeding is under control, you do not need to give further assistance.

- Stay with the injured person.
- Wait for emergency assistance to arrive.

The Clean-up

Safely taking care of the accident victim is just the start of removing infectious bloodborne diseases from your workplace. A hazardous situation will exist until:

- The entire area is cleaned of blood and body fluids.
- Contaminated cleaning equipment has been disinfected or disposed of safely.

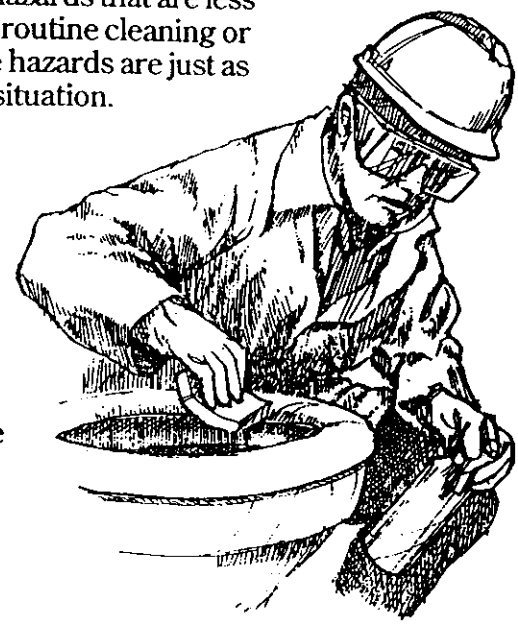
Safe Housekeeping

Whenever you clean up blood or body fluids on the job:

- Wear gloves to protect your hands. It is even recommended that you wear two pairs of gloves when cleaning up after an accident. Avoid tearing your gloves on equipment.
- Put on a leak-proof apron so that blood and body fluids will not get on your work clothes.
- Restrict access to the area.
- Use disposable towels to soak up most of the blood.
- Put all contaminated towels and waste in a sealed color-coded or labeled leak-proof container. Dispose of it as regulated waste.
- Clean with an appropriate disinfecting solution. Ten parts water to one part bleach will do it. Bleach will kill both HIV and HBV. After cleaning, promptly disinfect mops and any other cleaning equipment. Otherwise, you may spread viruses to other areas of the facility.

Other Exposure Hazards

Accidents are not the only times you might have to deal with blood and other potentially infectious body fluids. Sometimes you may face hazards that are less obvious while performing routine cleaning or maintenance tasks. These hazards are just as dangerous as an accident situation.

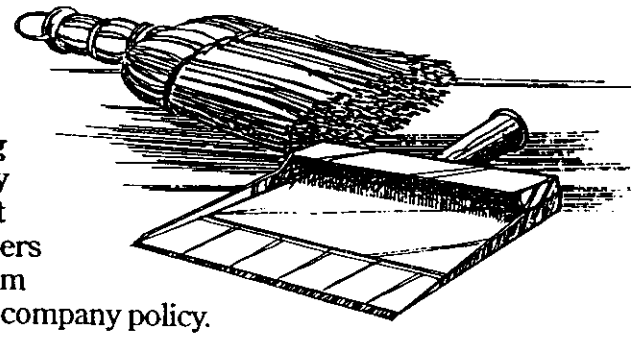


For example, blood may be present in vomit, urine or feces. Wear gloves and protective equipment if you must clean surfaces soiled with body fluids or excretions. Blood, even if you can't see it, can be almost anywhere you have to clean such as:

- Toilets
- Sinks
- Trash.

Be Prepared

- Always wear gloves and a protective smock or apron whenever there is the slightest risk.
- Be alert for sharp objects such as broken glassware or used syringes when emptying trash containers.
- Don't pick up broken glass directly with your hands. Use a brush and dustpan.
- Place contaminated sharp objects and other contaminated wastes or cleaning materials in sturdy puncture-resistant leak-proof containers and dispose of them according to your company policy.



Laundry

Handling laundry can also be a risky business. People do not realize that the laundry they carry may be dangerous. Bags of laundry sometimes conceal contaminated items:

- Bloody rags and clothing
- Contaminated sharps.

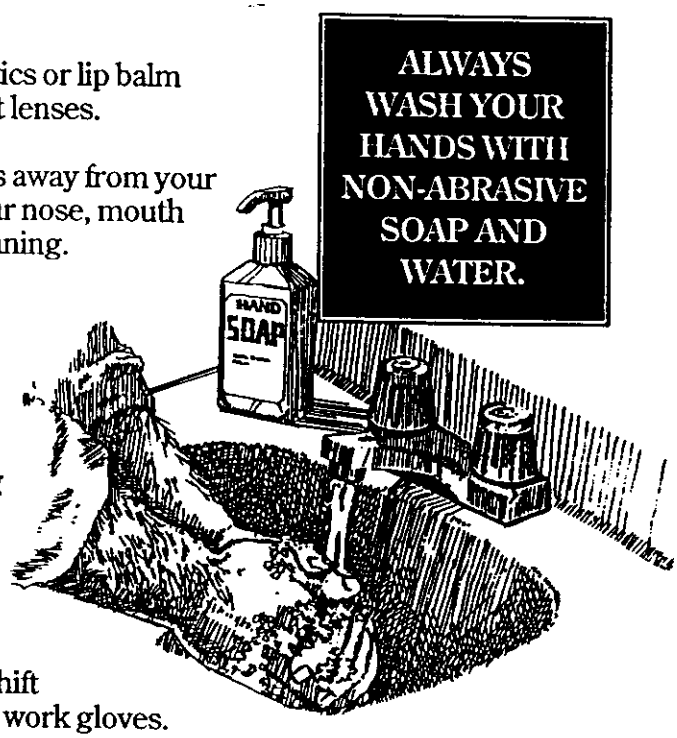
Remember, when handling laundry, carry it by the top. Never place a hand underneath to support it. When sorting laundry take precautions to protect yourself from the dangers within.

Common Sense Rules

Be sure to wash your hands and remove any protective clothing before:

- Eating
- Drinking
- Smoking
- Applying cosmetics or lip balm
- Handling contact lenses.

Keep your hands away from your face, especially your nose, mouth and eyes while cleaning.



Handwashing

Handwashing is one of your best defenses against spreading infection, including HBV and HIV. Always wash your hands with non-abrasive soap and water at the end of your shift and after removing work gloves.

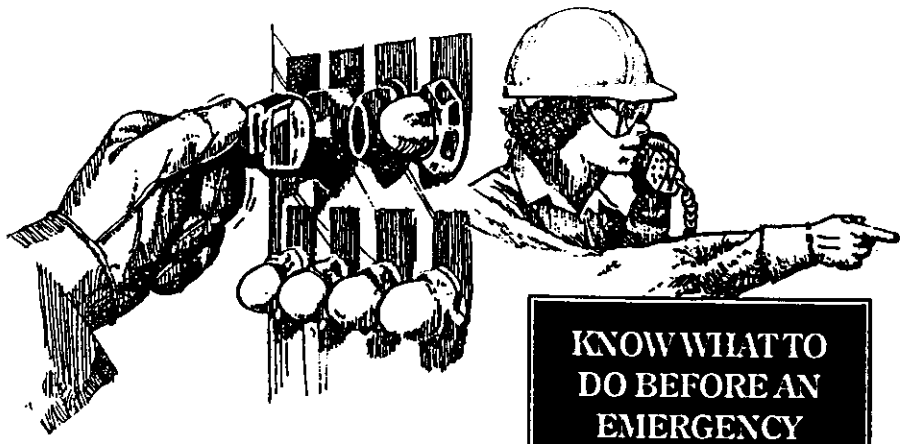
Emergency Assistance

Whether your company has emergency assistance or relies on outside professionals, these people are trained to help the accident victim while protecting themselves from bloodborne diseases at the same time.

- Know what to do before an emergency occurs.
- Find out whether your company has trained emergency care personnel and know how to contact them.
- Don't take unnecessary risks.
- Shut off machinery.
- Sound the alarm.
- Do whatever you must to save a life — but:
  - ✔ DO NOT touch blood or body fluids.
  - ✔ DO NOT give unprotected mouth-to-mouth resuscitation.
- Wait for emergency professionals to arrive on the scene.

After the Incident

If you get blood or body fluids on your gloves, clothes or shoes, remove them as soon as possible and place them in a sealed bag. Next, wash up with non-abrasive soap and water. Find out from your supervisor what company policy is for decontaminating or disposing of contaminated items.



Don't clean up blood or body fluids unless you have been trained to do so. And be sure to follow your company's policies to the letter.

If you do think you may have been exposed to blood or other potentially infectious material:

- Don't panic.
- Report the incident immediately to your supervisor.
- Try to determine the source of the blood or body fluid you contacted and even get a sample if possible.
- Your employer can advise you about HBV vaccination, testing, counseling and any follow-up steps.

Professionals use special protective equipment. Even the goggles, gloves and dust masks you use on-the-job can help keep blood and body fluids off your skin and out of your eyes, nose and mouth.

Summary

Protecting yourself from bloodborne diseases on-the-job requires knowing the facts, practicing good hygiene and taking a few sensible precautions. These are measures which you can control. They are vitally important, so take them seriously. If you care about your job, your fellow workers and yourself, it's worth it.

Quiz

1. True False There are about 200,000 people in the United States infected with HIV.

2. True False Only elderly people in cities get AIDS.

3. True False Universal Precautions means you must treat all blood and body fluids as potentially infectious.

4. True False Hepatitis B can usually be cured, but there is no cure for HIV yet.

5. True False You can help prevent HBV infection with a vaccination.

6. True False You can catch AIDS by just being around an infected person or breathing the air around them.

7. True False Tiny cuts in the skin, even dermatitis, can create doorways for potentially infectious blood or body fluids to enter your body.

8. True False In an emergency where a co-worker is injured, you do not have to protect yourself against possible infection.

9. True False Leak-proof gloves and goggles can help protect you against infectious diseases.

10. True False If you get blood or body fluids on your skin, immediately wash with water and non-abrasive soap.

11. True False If you come into unprotected contact with blood or body fluids, always wait to see if you are infected before you tell your supervisor.

12. True False After an injured employee is taken care of, the danger of infection is over.

13. True False It is recommended that you wear a fluid-resistant apron in addition to gloves whenever cleaning blood and body fluids spills.

14. True False Strong soap and water will disinfect contaminated blood and body fluids.

15. True False You must disinfect mops and cleaning tools after cleaning up infectious materials.

16. True False Blood may be present in vomit, urine and feces.

17. True False Laundry cannot carry infectious diseases.

18. True False Always carry laundry with one hand under the bag.

19. True False After cleaning, always wash your hands before eating, drinking, smoking, applying cosmetics or putting in contact lenses.

20. True False Protecting yourself from bloodborne diseases on the job requires knowing the facts, practicing good hygiene and taking a few sensible precautions.

ACKNOWLEDGEMENT OF TRAINING

I have read and understand the training handbook, **Protect Yourself.** I have also completed and passed the comprehensive quiz at the conclusion of the handbook.

_____ _____

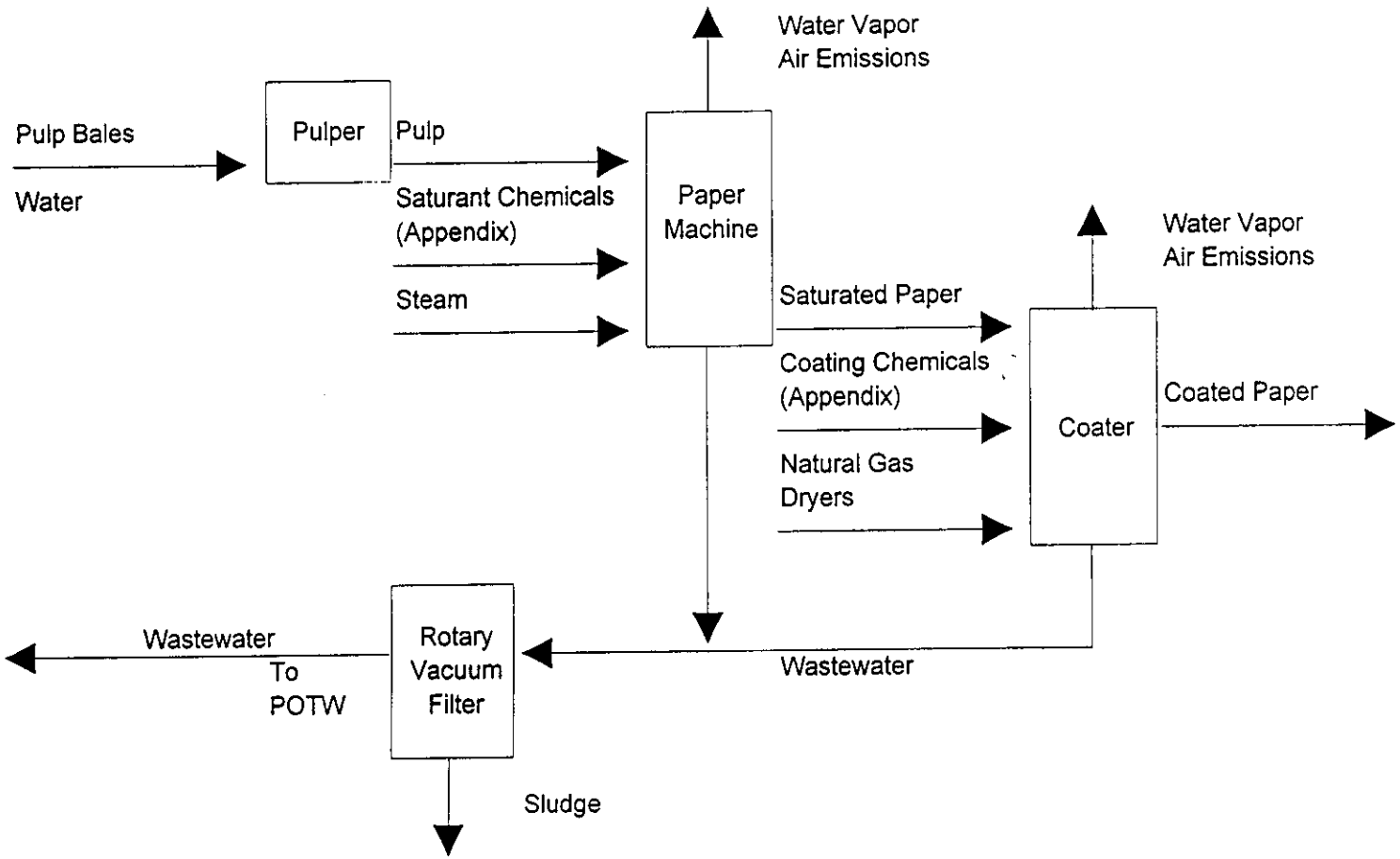
Employee's Signature Date

_____ _____

Trainer's Name Date

NOTE: This record may be included in the employee's personnel or training file.

Brownville Process Flow



	Raw Material Usage 5 Feb 96 - 4 Feb 97 Sorted by Class Code ** UOM's Vary !!!			
	Data taken from MF R 125			
	Part #	Desription	Amount	UOM
1	70132	MACKENZIE MK-90P SOFTWOOD	5,379.50	BA
2	70143	GRANDE PRAIRIE SOFTWOOD	6,951.75	BA
3	70169	WESTVACO PINNACLEPRIME HARDWD	20.00	BA
4	70178	NYLON6 1/4"x3dmf MINIFIBERS	61,825.00	PD
5	70191	DELTA STOCK	4,820.00	PD
6	70204	ARACRUZ BLEACHEDEUCALYPTUS,STD	9,731.00	BA
7	70205	OHIO 20%MIN POST-CONSUMER	16.00	BA
8	70212	ALABAMA PINE PULP	179.00	BA
9	70213	CELGAR SOFTWOOD "CELECT"	0.00	BA
10	70216	JARILIPTUS BL. EUCALYPTUS	0.00	BA
11	70217	BAHIA SUL PRIME EUCALYPTUS	3,641.00	BA
12	71035	ERIOSIN RED GR	0.00	PD
13	71101	ERIO YELLOW "T" SUPRA	18.70	PD
14	71105	DIPHENYL YELLOW G EXTRA	1.96	PD
15	71118	TINOPAL PT LIQUID	25,553.81	PW
16	71121	PONTAMINE KRAFT ORANGE A LIQ.	9,582.17	PW
17	71122	PONTAMINE YELLOW GXG LIQUID	1,734.09	PW
18	71127	PONTAMINE BLACK SP LIQUID	7,400.18	PW
19	71141	INTRABOND LIQUID RED 5BB	19,739.20	PW
20	71146	ARTILENE RED 1116-9 PASTE	443.75	PW
21	71147	ARTILENE BLACK 9564-9 PASTE	1,686.00	PW
22	71148	INTRABOND LIQ. TURQUOISE GLL	2,771.41	PD
23	71150	PERMABLAK 215 A	291,659.87	PW
24	71151	INTRACID PURE BLUE L PASTE	90.45	PW
25	71157	CARTA VIOLET 3B LIQUID 080	1,093.20	PW
26	71160	ANTHOSIN RED 28L LIQUID	0.00	PW
27	71162	ARTILENE YELLOW 4534-9 PASTE	295.75	PW
28	71164	BHD 6015 BLUE	313.33	PW
29	72051	BUSPERSE 47	0.00	PW
30	72903	#1 KYMENE 557H	4,015.00	PW
31	72959	SODIUM HYDROXIDE	5,026.00	PW
32	72965	BELCOR 585-K	2,150.00	PW
33	72971	AMRES 8855LE	77,088.00	PW
34	72972	AMRES HS30	57,006.10	PW
35	78000	WATER	0.00	GA
36	73004	2671	1,183,374.00	PW
37	73042	26138 (XPE-138)	565,686.45	PW
38	73050	26796	5,422,944.80	PW
39	73070	BUTOFAN NS 278	29,250.00	PW
40	73087	TYLAC 97861-00	8,460.00	PW
41	73094	AIRFLEX 100HS	694,567.00	PW
42	73097	RHOPLEX R-225 (6-4225)	9,705.00	PW
43	73098	TYLAC 68159-00	23,022.00	PW
44	73107	2679	313,340.00	PW
45	74092	OXALIC ACID	556.92	PD
46	74093	UREA	137,487.50	PD

47	74096	ACETIC ACID	23,257.62	PW
48	74099	7498 LIQUID	151,417.84	PW
49	74109	DEFOAMER L-474	6,031.27	PW
50	74130	AMERGEL - 100 ANTIFOAM	999.94	GA
51	74142	8162 EMULSION	412,040.61	PW
52	74149	CATALYST KR	3,576.40	PW
53	74156	ETHOX 3115	24,703.01	PW
54	74201	METSOL DT3H	317.75	PD
55	77001	AQUA AMMONIA	8,968.78	PW
56	77056	PENFORD GUM 280	87,400.00	PD
57	77084	ULTRA GLOSS 90	990,155.00	PD
58	77104	FOAMMASTER NXZ	5,328.07	PW
59	77126	TSPP	2,505.55	PD
60	77141	BUBBLEBREAKER 748 DEFOAMER	1,413.57	PW
61	77144	TITINT WHITE R	20,139.00	PD
62	77145	RPS VANTAGE TI02	63,539.00	PW
63	77156	TINOPAL CBS-X	727.48	PW
64	77173	POLY-EM 40	17,044.50	PW
65	77185	HT CLAY	261,150.00	PD
66	77187	ULTRA WHITE 90	1,063,875.00	PD
67	77189	ANSILEX 93	248,630.00	PD
68	77193	ROPAQUE HP-91 (7-1066)	160,045.00	PW
69	77194	FOAMASTER VF	2,934.95	PD
70	77197	CALGON T	739.30	PD
71	77201	DISPEX N40	2,133.61	PW
72	77203	TAMOL 850	3,363.80	PW
73	77204	SYLOID W 500	34,822.00	PW
74	77206	WITCO 3056A DEFOAMER	2,000.74	PW
75	77207	TACKIDEX 332F	5,709.00	PD
76	77929	CALCIUM CARBONATE H-90	319,256.90	PW
77	77930	CALCIUM CARBONATE COVERCARB	113,475.00	PW

		Brownville Pulps		
	Part #	Desription	Amount	UOM
	70132	MACKENZIE MK-90P SOFTWOOD	5,379.50	BA
	70143	GRANDE PRAIRIE SOFTWOOD	6,951.75	BA
	70169	WESTVACO PINNACLEPRIME HARDWD	20.00	BA
	70178	NYLON6 1/4"x3dmf MINIFIBERS	61,825.00	PD
	70191	DELTA STOCK	4,820.00	PD
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	70205	OHIO 20%MIN POST-CONSUMER	16.00	BA
	70212	ALABAMA PINE PULP	179.00	BA
	70213	CELGAR SOFTWOOD "CELECT"	0.00	BA
	70216	JARILIPTUS BL. EUCALYPTUS	0.00	BA
	70217	BAHIA SUL PRIME EUCALYPTUS	3,641.00	BA
	72959	SODIUM HYDROXIDE	5,026.00	PW
	72971	AMRES 8855LE	77,088.00	PW
	72972	AMRES HS30	57,006.10	PW

Saturant Chems

Part #	Desription	Amount	UOM
71035	ERIOSIN RED GR	0.00	PD
71101	ERIO YELLOW "T" SUPRA	18.70	PD
71105	DIPHENYL YELLOW G EXTRA	1.96	PD
71118	TINOPAL PT LIQUID	25,553.81	PW
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74156	ETHOX 3115	24,703.01	PW
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77929	CALCIUM CARBONATE H-90	319,256.90	PW
77930	CALCIUM CARBONATE COVERCA	113,475.00	PW

NOVEMBER 04, 1997

LEAD TESTING

TESTING OF OUR INCOMING WATER AND OUR EFFLUENT SYSTEM SHOWED NO SIGNS OF HIGH CONCENTRATIONS OF LEAD.

WE DO NOT HAVE ANY KNOWN SOURCES OF LEAD IN OUR PROCESS SO I DO NOT BELIEVE THERE IS ANY FURTHER TESTING REQUIRED AT THIS TIME.

Arthur Hilts

ARTHUR HILTS

LOZIER LABORATORIES, INC.

909 CULVER ROAD
ROCHESTER, NEW YORK 14609
TEL (716) 654-6350
FAX (716) 654-6354

NEW YORK STATE
APPROVED
ENVIRONMENTAL LABORATORY
10390

Client: Rexam DSI
Bridge St.
Brownville, NY 13615

Attn: Steve Lange

Client Project: Drinking Water

Date Received: 7/1/97
Laboratory No.: 13619
Report Date: 7/22/97

SAMPLE INFORMATION

Sample Date: 6/30/97	Matrix: Drinking Water
Sample: Plant	

LABORATORY REPORT

PARAMETER	RESULT	Units	Method Number	Analysis Date
Fluoride	<0.20	mg/l	SM 18 4500	7/8/97
Color	<5	ptCo	SM 18 2120 B	7/2/97
Odor	<1		SM 207	7/1/97
Sulfate	29	mg/l	EPA 375.4	7/2/97
Cyanide (T)	<0.01	mg/l	SM 4500	7/2/97
Chloride	26.5	mg/l	EPA 325.2	7/1/97
Nitrate-N	<0.20	mg/l	EPA 353.2	7/1/97
Nitrite-N	<0.20	mg/l	EPA 353.2	7/1/97
(T) Hardness	270	mgCaCO3/l	EPA 130.2	7/1/97
TDS	306	mg/l	EPA 160.1	7/1/97
pH	7.48	S.U.	EPA 150.1	7/1/97
Arsenic	<0.025	mg/l	EPA 200.9	7/10/97
Barium	<0.20	mg/l	SM 18 3111B	7/14/97
Cadmium	<0.002	mg/l	EPA 200.9	7/14/97
Chromium	<0.01	mg/l	EPA 200.9	7/8/97
Selenium	<0.002	mg/l	EPA 200.9	7/17/97
Mercury	<0.0002	mg/l	EPA 245.1	7/7/97
Iron	<0.06	mg/l	SM 18 3111B	7/7/97
Manganese	<0.01	mg/l	SM 18 3111B	7/8/97
Sodium	13.3	mg/l	SM 18 3111B	7/2/97
Zinc	<0.05	mg/l	SM 18 3111B	7/3/97
Antimony	<0.005	mg/l	EPA 200.9	7/14/97
Beryllium	<0.001	mg/l	EPA 200.9	7/21/97
Nickel	<0.05	mg/l	SM 18 3111B	7/15/97
Thallium	<0.004	mg/l	EPA 200.9	7/22/97
Lead	0.001	mg/l	EPA 200.9	7/11/97
Copper	0.08	mg/l	SM 18 3111B	7/15/97
Silver	<0.01	mg/l	SM 18 3111B	7/1/97

Footnotes: The Mercury analysis was performed by NYSDOH Lab Id # 10312.

Approved By:

LOZIER LABORATORIES, INC.

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ROCHESTER, NEW YORK 14609
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FAX (716) 654-6354

NEW YORK STATE
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ENVIRONMENTAL LABORATORY
10390

Client: Rexam DSI
Bridge St.
Brownville, NY 13615

Attn: Steve Lange

Client Project: Annual/Semiannual Effluent Wastewater Analyses

Date Received: 7/1/97
Laboratory No.: 13621
Report Date: 7/18/97

SAMPLE INFORMATION

Sample Date: 6/24-6/27/97 Matrix: Waste Water
Sampler: Client

LABORATORY REPORT

Lab ID: / Client ID: / Location:	13621-1 Effluent Composite			
PARAMETER		Units	Method Number	Analysis Date
(T) Cyanide	<0.05	mg/l	SM 4500CN	7/2/97
Antimony	<0.05	mg/l	EPA 204.2	7/10/97
Arsenic	<0.025	mg/l	EPA 206.2	7/10/97
Barium	0.10	mg/l	EPA 208.2	7/10/97
Beryllium	<0.05	mg/l	EPA 210.2	7/10/97
Cadmium	<0.05	mg/l	EPA 213.1	7/10/97
Chromium (T)	<0.05	mg/l	EPA 218.1	7/10/97
Copper	<0.05	mg/l	EPA 220.1	7/10/97
Iron	0.88	mg/l	EPA 236.1	7/10/97
Lead	<0.05	mg/l	EPA 239.1	7/10/97
Manganese	0.10	mg/l	EPA 243.1	7/10/97
Mercury	<0.002	mg/l	EPA 245.1	7/10/97
Nickel	<0.05	mg/l	EPA 249.1	7/10/97
Selenium	<0.05	mg/l	EPA 270.1	7/10/97
Silver	<0.05	mg/l	EPA 272.1	7/10/97
Zinc	0.18	mg/l	EPA 289.1	7/10/97
EPA 642 Volatiles*	See attached	ug/l	EPA 624	7/9/97
EPA 625 Semivolatiles*	See attached	ug/l	EPA 625	7/9/97

* Analysis performed by NYSDOH LAB # 11369
Footnotes: Metals analyses performed by NYSDOH LAB # 11369

NYSDOH LAB ID # 10390

Approved By: Dan Cahn

NOVEMBER 04, 1997

FORK TRUCK INSPECTION PROCEDURES

FORK TRUCK INSPECTIONS MUST BE DONE AT THE START OF EVERY SHIFT. AN INSPECTION REPORT MUST ALSO BE FILLED OUT FOR EVERY TRUCK THAT IS GOING TO BE USED.

MAINTENANCE WILL DO THE INSPECTION AT 7:00 AM AND 3:00 PM AND THE FOREMAN ON 11-7 WILL DO THE INSPECTION WHEN HE COMES ON SHIFT. THE FORK TRUCK OPERATOR WILL INSPECT AND FILL OUT INSPECTION SHEET AT THE EDMUND STREET WAREHOUSE AND TURN IT IN TO FOREMAN'S OFFICE DAILY.

Daily Operator Check List

Week Beginning Hr. Meter Reading _____

Date:_____ Make / Model _____ 1 st. Shift

Truck No._____

Inspector_____

1.) Clark Clamp
2.) Yale Clamp
3.) Clark Fork
4.) Toyata Fork (Beater Area)
5.) Old Clark Fork (Machine Chest Area)
6.) Maintainence Fork (Lower Floors)
7.) Big Yale
8.) Warehouse Fork
9.) Electric Pallet Jack (Beater Area)
10.) Electric Pallet Jack (2nd Floor)

	M	Tu	W	Th	F	Sa	Su
Fuel LP Leaks / Battery and Connections							
Engine Oil Level							
Coolant System and Level							
Tires							
Oil Pressure							
Ampmeter							
Lights							
Horn and Signaling Devices							
Hoist Controls							
Tilt Controls							
Attachment Operation Controls							
Drive Control / Transmission							
Steering							
Service Brakes							
Parking Brake							
Hydraulic Leaks							
Overhead Guard							
Load Backrest							
Loose or Missing Parts							
Visual Damage							

Other Comments _____

REXAM DSI
BRIDGE STREET
BROWNVILLE, NEW YORK

SAFETY GLASS POLICY

EFFECTIVE JANUARY 01, 1998, SAFETY GLASSES ARE MANDATORY AND ALL EMPLOYEES ARE REQUIRED TO WEAR APPROPRIATE EYE PROTECTION WHILE IN THE MILL WITH THE EXCEPTION OF THE OFFICE.

THE ACCEPTED MINIMUM EYE PROTECTION IS SAFETY LENSES AND FRAMES WITH SIDE SHIELDS.

SAFETY GLASSES ARE PROVIDED FOR EMPLOYEES WHO DO NOT REQUIRE PRESCRIPTION LENSES AND ARE AVAILABLE IN THE FOREMEN'S OFFICE.

EMPLOYEES WHO WEAR PRESCRIPTIONS LENSES WILL BE PROVIDED WITH A PAIR OF PRESCRIPTION SAFETY GLASSES EVERY TWO YEARS. EMPLOYEES ARE RESPONSIBLE FOR THEIR EYE EXAMS AND MAY PURCHASE THEIR SAFETY GLASSES AT PEARLE VISION, EMPIRE VISION OR FROM OCCUPATIONAL EYEWEAR. OCCUPATIONAL EYEWEAR VISITS THE MILL PERIODICALLY THROUGHOUT THE YEAR.

REXAM DSI WILL PAY $45.00 TOWARDS THE COST OF THE FRAMES, LENSES INCLUDING BI-FOCALS AND TRI-FOCALS ARE PAID IN FULL AS ARE SIDE SHIELDS.

TO OBTAIN PRESCRIPTION GLASSES FROM PEARLE VISION OR EMPIRE VISION, YOU MUST OBTAIN A VOUCHER FROM THE OFFICE. THEY WILL DIRECT BILL REXAM AND ANY ADDITIONAL CHARGES, OTHER THAN THOSE LISTED ABOVE, WILL BE THE RESPONSIBILITY OF THE EMPLOYEE. A NOTICE WILL BE POSTED WHEN OCCUPATIONAL EYEWEAR WILL BE IN THE MILL.

DECEMBER 04, 1997

NOTICE

EFFECTIVE JANUARY, 1998 SAFETY GLASSES IN THE MILL WILL BE MANDATORY.

IN ANTICIPATION OF THIS, REXAM DSI HAS ARRANGED TO HAVE CHUCK MISHALANIE OF OCCUPATIONAL EYEWEAR IN THE PLANT THURSDAY, DECEMBER 18, 1997 FROM 2:00 PM TO 4:00 PM. CHUCK DOES NOT DO EYE EXAMS SO YOU MUST HAVE A CURRENT PRESCRIPTION FROM YOUR DOCTOR OR HE CAN OBTAIN A PRESCRIPTION FROM YOUR EYE GLASSSES.

IF YOU HAVE ANY QUESTIONS CONCERNING OUR SAFETY GLASS PROGRAM, PLEASE SEE PHYLLIS OR ABBIE.

WORKPLACE
SMOKING
POLICY

REXAM DSI
BROWNVILLE, NEW YORK

In compliance with Article 13-E, S1399N seq., of the Public health Law of New York, this employer has adopted the following policy on the smoking of tobacco products in this workplace.

The purpose of this policy is to accommodate the needs of both smoking and nonsmoking employees in accordance with state law.

1. In areas not generally accessible to the public:

(A) Nonsmoking employees are entitled to work in an area which is smoke-free. A smoke-free area is an area where no smoking occurs and where the drift of smoke from smoking areas is negligible. This area will be clearly designated and separate from areas where smoking is allowed.

(B) Smoking is permitted in the private, enclosed offices of employees.

(C) Work areas shall be set aside for smoking if all the employees who work in the area agree.

(D) Signs shall be posted to identify areas as "Smoking" or "No Smoking".

(E) No smoking is permitted in the following areas:

--restrooms	--gymnasiums
--elevators	--classrooms
--hallways	--medical facilities
--auditoriums	--copying machine room or other office equipment rooms
--lunch room	--labs

2. In places which are generally accessible to the public, there shall be no smoking.

3. Employees who smoke in no smoking areas are in violation of New York State law. This policy is effective as of April 1, 1990.

11/18/97
DATE

Arthur Hibbs
COMPANY OFFICIAL'S SIGNATURE

The SOHO Guidebook
People Who Work for You

New York

General provisions. The New York legislature passed a law protecting nonsmokers from exposure to secondary smoke in the workplace. Covered workplaces include any indoor area where employees perform services that is not generally accessible to the general public, however the law also regulates smoking in indoor areas that are generally accessible. Accordingly, an employer that fits into either category would be subject to the law.

Employers covered. Employers with one or more employees.

Written policy requirements. The law requires employers, including state and local governments, to adopt and implement a written smoking policy. This policy must designate smokefree work areas for nonsmoking employees, although the employer is not required to make expenditures or structural changes to create these areas. Work areas permitting smoking may be provided if all employees agree to the designation.

The policy must also set aside contiguous nonsmoking areas large enough to accommodate employee demand in employee cafeterias, lunch rooms and lounges. The policy should prohibit smoking in common workplace areas such as rest rooms, elevators, classrooms, hallways and photocopy machine rooms, and prohibit smoking in conference rooms unless no one objects.

Posting requirements. Copies of the employer's smoking policy should be posted in the workplace and distributed to employees upon request. Signs must read "Smoking" or "No Smoking" or have the international "No Smoking" symbol prominently displayed.

No smoking areas. Smoking is prohibited in these indoor areas that are open to the public: auditoriums, elevators, gymnasiums, indoor swimming pools, indoor areas of food stores (note that a separate rule governs restaurants), classrooms, public mass transportation, ticketing and boarding areas in public transportation terminals, youth centers and detention facilities, child care services facilities, child day care centers, group homes for children, public institutions for children, residential treatment facilities for children, general hospitals and residential health care facilities.

In addition, smoking is prohibited except in designated areas in all public and private schools, in hospitals and health care facilities (except in cafeterias), in public buildings, theaters, museums, libraries, retail stores, commercial establishments, indoor arenas, waiting room and waiting areas, banks, restrooms and service areas in cafeterias, businesses selling food and zoos.

Food service establishments must provide a nonsmoking section and may not determine that no demand for a nonsmoking section exists.

Designated smoking areas. The fact that an employer is permitted to designate smoking areas does not prevent that employer from designating the entire workplace or a part of it as nonsmoking. Nor does this law preclude political subdivisions from establishing their own smoking laws, so long as those laws at least comply with the minimum applicable standards set forth by state law.

*Click the **Back** button on the toolbar to return to your previous location.*

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REXAM DSI
BRIDGE STREET
BROWNVILLE, NEW YORK

SAFETY SHOE POLICY

REXAM DSI, BROWNVILLE DIVISION, REQUIRES STEEL TOED SHOES FOR PRODUCTION, BOILER AND MAINTENANCE ON THE FLOOR. SAFETY SHOES ARE NOT REQUIRED IN THE OFFICE AREA.

TO DEFRAY THE COST OF THIS EXPENSE, REXAM WILL REIMBURSE EACH EMPLOYEE UP TO $70.00 TWICE A YEAR($140.00 A YEAR TOTAL) FOR THE PURCHASE OF NEW SAFETY SHOES. THE BALANCE WILL BE THE EMPLOYEE'S RESPONSIBILITY AND MUST BE PAID BEFORE RECEIVING THE SHOES. BALANCES LEFT OVER FROM THE $70.00 ALLOWANCE WILL NOT BE CARRIED FORWARD.

SAFETY SHOES ARE ORDERED THREE TIMES PER YEAR. THIS IS DONE AT THE END OF JANUARY, JUNE, AND DECEMBER. EMPLOYEES WISHING TO ORDER SHOES THROUGH LEHIGH AND IRON AGE MUST HAVE THEIR ORDERS INTO THE OFFICE BY THESE DATES.

EMPLOYEES MAY PURCHASE SAFETY SHOES LOCALLY AND PRESENT A RECEIPT TO THE OFFICE FOR REIMBURSEMENT.

NOVEMBER 04, 1997

SAFETY SHOE POLICY

REXAM DSI, BROWNVILLE PLANT'S POLICY IS THAT SAFETY SHOES ARE MANDATORY FOR ALL EMPLOYEES.

REXAM PAYS $140.00 PER YEAR OR $70.00/EACH FOR TWO PAIR OF SHOES EACH YEAR.

THE SHOES ARE ORDERED THREE TIMES EACH YEAR IN JANUARY, JUNE AND NOVEMBER. A NOTICE IS POSTED INFORMING THE EMPLOYEES THAT THE SHOES WILL BE ORDERED ON A SPECIFIC DATE SO EVERYONE WILL KNOW WHEN TO TURN THEIR SHOE ORDERS IN.

Arthur Hilts

MAY 01, 1998

PROCEDURE FOR TRANSPORTING PROPANE TANKS

EFFECTIVE IMMEDIATELY ALL PROPANE CYCLINDERS, EMPTY OR FULL, MUST BE MOVED BY USE OF THE HAND CART INTENDED FOR THIS PURPOSE.

EMPLOYEES NOT FOLLOWING THIS PROCEDURE ARE JEOPARDIZING THEIR SAFETY.

FAILURE TO FOLLOW THIS SAFETY RULE WILL RESULT IN DISCIPLINARY ACTION.

Arthur Hilts

ART HILTS

05/01/98

DO NOT BLOCK

FIRE

EXTINGUISHERS.

EFFECTIVE IMMEDIATELY,

HOSES MUST BE HUNG IN

PROPER LOCATION AFTER

EACH USE.

LATHE MILLING

ANYONE OPERATING THE LATHE MUST BE CERTIFIED BY THE PLANT ENGINEER.

PROCEDURE FOR CUTTING WIRES FROM PULP BALES

1. BOTH FACE SHIELD AND SAFETY GLASSES MUST BE WORN.
2. GLOVES MUST BE WORN.
3. PLACE ONE HAND OVER WIRE BEFORE CUTTING.
4. USE OTHER HAND TO CUT THE WIRE.
5. USE GOOD QUALITY WIRE CUTTERS.

REXAM DSI
BROWNVILLE DIVISION

EMERGENCY AND EVACUATION PLAN

Incipient stage fires (ones which are in the initial stage and can be controlled or extinguished with portable fire extinguishers without the need for protective clothing or breathing apparatus) will be fought by mill personnel.

All employees will be trained on the proper use of fire extinguishers and will be given a refresher course each year thereafter.

For Incipient Stage Fire:

Efforts will be made to extinguish the fire making sure that proper extinguishers are used. For example: Do not use water on an electrical fire - use either co2 or dry powder.

If it is possible to bring the fire under control using the available in-plant equipment, then the following procedures will be followed:

1. If anyone has inhaled too much smoke or suffered cuts and abrasions, the supervisor is to make sure that they are properly cared for. If necessary, he will have the paper tester call 911 to transport the injured to the hospital emergency room.

2. If the sprinkler system has been in operation, the control valve for the area of the fire will be closed by the boiler house operator and maintenance Personnel will replace the necessary heads. After the heads are replaced, the water is to be turned back on.

3. The fire pump is to remain in operation until the system is checked out and the water tower is full.

4. The supervisor will direct his crew to take all used fire extinguishers to the boiler house where they will be picked up and refilled at the earliest possible time.

5. If the fire has been on the machine, any necessary repairs will be made and the machine put back in production.

6. If the fire develops into a structural fire, evacuation plan should be followed.

Emergency:

There are two (2) Distinct Emergency Horns that can be activated. The normal steady horn warns that a structural fire or other major emergency has developed and the plan below should be followed.

For a Structural Fire:

Whenever an emergency is detected, the supervisor on shift is to be advised immediately. He will take charge and direct the activities. He will activate the emergency horn at any of the three (3) pull stations located at the overhead door exit by the boiler room, the alley way exit, and Bridge Street front door exit. This will set off the normal steady alarm and the fire department will be immediately notified.

The supervisor will direct the third hand to proceed to the outside of the mill and give directions to the emergency crews when they arrive.

The machine tender will see that all head and roof exhaust fans are shut down. He will keep the dryer sections running.

If management people are not at the mill, the supervisor on shift will call the following and advise them of the emergency:

Mark Lappies	782-8919
Art Hilts	649-2815

He will also call the following maintenance people and advise them of the emergency:

Dennis Trombley	788-5596
Rick Wilson	782-8332

The boiler house operator will then check the automatic starting fire pump promptly and stand by to operate sprinkler valves as required and electrical switches if it is necessary to turn off power to any area.

Evacuation Plan:

Upon hearing the steady horn alarm all personnel should evacuate the building.

1. Machine crews will leave by the front door on Bridge Street.
2. Coater, rewinder and roll wrapping crews leave by the side door.
3. Beater room, boiler house and maintenance crews will leave by the boiler house door.
4. All crews will proceed to the Legion parking lot.
5. All office personnel will leave by the front door on Bridge Street.
6. The supervisor on his way out will pick up the crew schedule of the personnel working in the mill at the time of the emergency. Upon his arrival at the Legion parking lot, he will check to make sure that everyone has been evacuated.

DATE: FEBRUARY 21, 2000

TO: FRED GILCHRIST*, JASON GILCHRIST, JOHN GREENWOOD*, TERRY HARMYCH, ART HILT, BETH KROWL, STEVE LANGE*, MARK LAPPIES*, ED MCWAYNE, GEORGE NEBEL*, MIKE O'HARA, ROS SEGOVIS*, TIM SHEAR*, TOM SPENCER, JIM STORRS*, NORM TOMLINSON*, DENNIS TROMBLEY, DARLENE WARD, JON WARD, CATHY PORTER*

FROM: PHYLLIS CHASE*

*DENOTES ATTENDEES

CC: JOE BENISH, BILL HUGHES

SUBJECT: SAFETY MEETING

The monthly Safety Meeting was held on Thursday, February 17, 2000 at 1:30 pm. The minutes from the meeting are as follows:

Brownville has gone 421 days without a losttime accident and 51 days since the last OSHA recordable.

Since the last meeting , there were two accidents:

- Employee complained of pain in left arm possibly due to position of keyboard in relation to computer monitor. Keyboard has been repositioned.
- Employee received burn to left arm when unplugging agitator on K tank.

One near miss was reported:

- 3rd station coating helper was using hoist truck to place a skid of clay on coater kitchen mezzanine. An empty skid of drums was partially blocking the mezzanine loading area. To avoid hitting the drums, the employee accidentally hit verticle beam for bag hoist causing it to swing rapidly through the area. If anyone had been in the area, they could have been seriously injured.

OVERALL GOAL	OVERALL PERIOD 01	2000 YEAR TO DATE	1999 TOTAL
3.0	0.0	0.0	5.2

The following are recommendations from the current safety inspection:

- Guard on reel at dry end of paper machine needs to be fixed. Down day project.
- Empty dye barrels need to be taken care of on backside of 2nd section.
- Extension cords and fans creating a mess on backside of 1st section.

The following are recommendations from past safety inspections:

- Two issues at Edmund Street Warehouse remain:
  1. Roof over front door is gone and consequently water freezes on ramp. A baluster will be installed to prevent trucks from hitting the roof. Once this is done, the roof will be repaired.
  2. A rain gutter is needed on the back.(In progress)
- In the inspection winder area, concrete pillar beside baler is loosing large pieces of the concrete. (Mark evaluating) Shutdown project.
- Containers next to electrical room need to be checked and removed. George Nebel & Steve Lange
- A grate was installed on the coater due to the accident mentioned above. A concern was raised that a handle should be put on the grate so employees will have a more secure hold when lifting the grate.

Additional safety issues and concerns that were presented in addition to the current and past inspections are:

- Steve Lange checking on PPE for oxalic acid.
- An employee was observed not wearing the proper PPE when handling acetic acid. A notice will be put in log book.
- A concern was stated about roll stoppage at end of winders. Mark Lappies will investigate different types of chocks.
- A new item in the General Safety Rules states that anyone handling over 50 lbs. must obtain help. This raised a point concerning the moving of drums. To be resolved and presented at next safety meeting.
- In response to the accident report involving improper placement of keyboard in relation to computer, a Toolbox subject will be on ergonomics.

The March Toolbox subjects will be selected by John Greenwood. Steve Lange and Tim Shear will serve as the March accident investigation team. George Nebel with an employee from the sign-up list will conduct the March monthly inspection. Tim Shear will select someone from the floor to select the safety incentive award for March.

THE NEXT MEETING WILL BE

MARCH 16, 2000

AT 1:30 PM IN THE CONFERENCE ROOM.

EVERYONE PLEASE PLAN ON ATTENDING.

SAFETY MEETING AGENDA

FEBRUARY 17, 2000

1. **SAFETY STATISTICS:**

   ✓ **# DAYS WITHOUT LTA** 421

   ✓ **# DAYS SINCE OSHA RECORDABLE** 51

2. **REVIEW OF ACCIDENTS:**

   ✓ **ACCIDENTS** 2
   ✓ **NEAR MISSES** 1
   ✓ **FIRE INCIDENT REPORT** 0
   ✓ **ACCIDENTS AT OTHER DSI SITES** 1

3. ✓ **REVIEW INTERNAL SAFETY INSPECTION**

   ✓ **PREVIEW PREVIOUS RECOMMENDATIONS**

4. ✓ **OTHER SAFETY ISSUES & CONCERNS**

5. **SAFETY INCENTIVE REPORT**

① Toolbox mtg. Ergonomics
② Lange checking on PPE for employees (PPE) for acetic acid.
③ No safety
④ Roll stoppage at end of winter.
M. Lappin investigating diff types of chocks
⑤ Handling of drums

MARCH TOOLBOX SUBJECTS: J. Greenwood

MARCH INVESTIGATION TEAM: Lange
Shear

MARCH MONTHLY INSPECTION: Dobel

MARCH SAFETY INCENTIVE: Tom Floor

Feb. radio flashlight - G. Gould

	FEBRUARY 17, 2000
	ANGUS, JOHN SR.
✓	CHASE, P.
✓	GILCHRIST, F.
NO	GILCHRIST, J.
✓	GREENWOOD, J.
	HARMYCH, T.
	HILTS, A.
	KROWL, B.
✓	LANGE, S.
✓	LAPPIES, M.
	MCWAYNE, E.
✓	NEBEL, G.
	O'HARA, M.
✓	SEGOVIS, R.
✓	SHEAR, T.
	SPENCER, T.
✓	STORRS, J.
✓	TOMLINSON, N.
	TROMBLEY, D.
	WARD, D.
	WARD, J.
✓	PORTER, C.

INCIDENT INVESTIGATION REPORT

This form must be completed in it's **entirety. Do not** write in the shaded areas. A First Report of Injury must accompany this Incident Investigation report.

Brownville

1. Employee Involved: Donna Raines
2. Date of Incident: 1/20/00
3. Time of Incident: In afternoon
4. Date Reported: 1/28/00
5. Was report to Supervisor or First Aid Delayed? [X] Yes [ ] No — If Yes, why? Thought it would heal. [illegible]
6. Employee's Regular Occupation: Data Analyst
7. Regular Occupation at Time of Incident? [X] Yes [ ] No [ ] Other
8. Shift Worked? Day Shift (7-3:30)
9. Shift Starting Time: 7AM
10. Number of Hours Employee Worked Before Injury: ???
11. Specific Task Being Performed: working on computer
12. Employee Medical Status: [ ] First Aid [ ] Sent to O.H. & .R. [ ] Sent to Hospital — NOT
13. Did Anyone Come in Contact with Blood or Bodily Fluids? [ ] Yes [X] No — If Yes, Employee Name?
14. Description of Incident: Computer screen was in left corner of her desk but keyboard off to right of that. Arm getting sore (left one). Believe it's from looking over at the screen.
15. Nature/Extent of Injuries or Property Damage: Still sore today but she does not feel it's necessary to have checked at this point.
17. Team Leader Signature: Elizabeth A Kraus
18. Employee Signature: Donna L. Raines
19. Date: 1/28/00

REVIEW BY TEAM LEADER

20. Check One of the Following: [ ] Unsafe Act [x] Unsafe Condition [ ] Equipment Failure [ ] Poor Housekeeping
21. Was the employee using medication when the accident occurred? N/A.
22. Is there a possibility that the accident occurred on the employee's own? Doesn't sound like it.
23. Was there a Witness? [ ] Yes [X] No
24. If Yes, the Witness Name: (mentioned to Ros Segurs next day)
25. Was a Statement obtained from the Witness? [ ] Yes [ ] No N/A
26. Investigation Revealed: Computer screen needed to be moved to prevent Donna from having to look/shift left to see it.
27. Corrective Action Taken or Recommended: Computer screen moved so now in line with keyboard.
28. Type of Injury: [ ] Recordable [ ] Recordable with Lost Time [ ] First Aid [ ] Close Call - No Injury

INCIDENT INVESTIGATION REPORT

This form must be completed in it's **entirety**. **Do not** write in the shaded areas. A First Report of Injury must accompany this Incident Investigation report.

Brownville

1. Employee Involved: T. Fancher
2. Date of Incident: 2-3-00
3. Time of Incident: 5:00 AM
4. Date Reported: 2-3-00
5. Was report to Supervisor or First Aid Delayed? [X] Yes [ ] No — If yes, Why:
6. Employee's Regular Occupation: B. Helper
7. Regular Occupation at Time of Incident? [X] Yes [ ] No [ ] Other
8. Shift Worked? 11-7
9. Shift Starting Time: 11:00 pm
10. Number of Hours Employee Worked Before Injury: 6
11. Specific Task Being Performed: Cleaning "K" Tank
12. Employee Medical Status: [X] First Aid [ ] Sent to O.H. & .R. [ ] Sent to Hospital
13. Did Anyone Come in Contact with Blood or Body Fluids? [ ] Yes [ ] No
14. If Yes, Employee Name(s):
15. Description of Incident: Employee burnt Left arm unplugging agitator on "K" Run tank
16. Nature/Extent of Injuries or Property Damage: Blister to inside left forearm size of a nickel
17. Team Leader Signature: Mike O'Hare
18. Employee Signature: Timothy Fancher
19. Date: 2-3-00

REVIEW BY TEAM LEADER

20. Check One of the Following: [ ] Unsafe Act [x] Unsafe Condition [ ] Equipment Failure [ ] Poor Housekeeping
21. Was the employee taking medication when the accident occurred?
22. Is there a possibility that the accident occurred as the employee was?
23. Were there Witnesses? [ ] Yes [ ] No
24. If Yes, List Witness Name(s)
25. Was a Statement obtained from the Witness? [ ] Yes [ ] No
26. Investigation Revealed: Un insulated Steam Line near outlet
The outlet is in a congested area
It is so high up people stand on Tank to reach it
Tank ~~should~~ agitators should be locked out Not unplugged ?
27. Corrective Action Taken or Recommended: insulated Steam Line
Establish + Follow lock out procedures for tanks in cooler kitchen before ~~clean~~ entering them to clean them.
28. Type of Injury: [ ] Recordable [ ] Recordable with Lost Time [X] First Aid [ ] Close Call - No Injury

REXAM DSI
BRIDGE STREET
BROWNVILLE, NY 13634

NEAR MISS REPORT

DATE OF INCIDENT: 2-5-2000

TIME OF INCIDENT: 8:15am

DESCRIPTION OF INCIDENT: 3rd station coating helper was using hoist truck to place a skid of Asilex on coater kitchen mezzanine. A skid of empty drums was on the floor partially blocking the mezzanine loading area and to avoid hitting the drums the skid of Ansilex hit the verticle beam for the bag hoist on the mezzanine causing it to swing rapidly through the mezzanine area. Fortunately no one was in its path and no one got hurt

CAUSE OF INCIDENT:

1) Congested area that is difficult to see when lifting skids
2) Skid of drums partially blocking loading area
3) Unused bag hoist that takes up a lot of valuable space.

CORRECTIVE ACTION:

1) Make sure nothing is blocking the loading area.
2) Remove bag hoist from mezzanine
3) Install mirrors to improve visibility when lifting skids.
4) new coater kitchen? (M)
The Bag Hoist was removed

George Nebel
SIGNATURE OF EMPLOYEE REPORTING INCIDENT

SAFETY INSPECTION

Cont'.

done

WET END PAPER MACHINE:

PAIL FOR ETHOX NOT LABELED (DONE)

4TH HANDS AREA:

OK

when machine is down

DRY END PAPER MACHINE:

GUARD ON REEL NEEDS to BE FIXED

SAFETY INSPECTION

Cont'.

BACK SIDE PAPER MACHINE:

Empty Dye Barrels Need to Taken Care of on Backside of 2nd Sec.

done Electrical Cord on Floor By Eyewash (Done)

done Eyewash Blocked (Done)

Backside 1st Sec (Mess)

extension cord + fans

COATER:

done Storage tank Room (Mess)

COATER KITCHEN AREA:

O/K

SAFETY INSPECTION

Cont'.

INSPECTION WINDER AREA:

OK

ROLL STORAGE BY LAB ENTRANCE:

OK

LAB:

In progress

NEW LAB (MESS)

OLD LAB (OK)

SAFETY INSPECTION

Cont'.

2ND FLOOR:

OK

BEATER ROOM:

OK

MAINTENANCE SHOP:

ok

SAFETY INSPECTION

Cont'.

BOILER ROOM:

OK

4TH FLOOR:

OK

3RD FLOOR:

done TOE BOARD for railing by [redacted]

elec. room.

SAFETY INSPECTION

DATE:_____
Inspected by:
_____
_____

WAREHOUSE:

GENERAL CLEANING

LENNOX Room

done SMALL Rolls of PAPER By 1st AID Box (DONE)

CARPENTER'S SHOP:

under construction

DOCK WAREHOUSE:

UNDER CONSTRUCTION

EDMUND ST. WAREHOUSE:

done LIGHT AT ENTRANCE WAY

DATE: MARCH 16, 2000

TO: FRED GILCHRIST, JASON GILCHRIST, JOHN GREENWOOD, TERRY HARMYCH, ART HILT*, BETH KROWL, STEVE LANGE*, MARK LAPPIES*, ED MCWAYNE, GEORGE NEBEL*, MIKE O'HARA, ROS SEGOVIS*, TIM SHEAR*, TOM SPENCER, JIM STORRS*, NORM TOMLINSON*, DENNIS TROMBLEY, DARLENE WARD, JON WARD*, CATHY PORTER

FROM: PHYLLIS CHASE*

*DENOTES ATTENDEES

CC: JOE BENISH, BILL HUGHES

SUBJECT: SAFETY MEETING

The monthly Safety Meeting was held on Thursday, March 16, 2000 at 1:30 pm. The minutes from the meeting are as follows:

Brownville has gone 449 days without a losttime accident and 12 days since the last OSHA recordable.

Since the last meeting , there were three accidents:

- Employee was cleaning a tank with the hotsy when a small chip of coating blew into his right eye.
- While attempting to slow down roll of paper on inspection winder, employee's right heel became wedged underneath causing his foot to bend forward. Sustained a fractured metacarpal bone.
- Employee was walking into driveway entrance and slipped and fell on ice and snow.

OVERALL GOAL	OVERALL PERIOD 03	2000 YEAR TO DATE	1999 TOTAL
3.0	NA	NA	5.2

The following are recommendations from the current safety inspection:

- Skid of roll end wraps blocking aisle to conference room.
- HP 1055 barrels on a skid not banded or wrapped. (Harold Hine)
- Broken cement near yellow railing to outside ramp at dock warehouse should be removed.
- Weight for paper machine winder pedal sticks out in aisle.
- Accuracy of ammonia sensor in question. Ammonia odors can be detected but the alarm doesn't sound. (Steve Lange will put out a notice explaining)
- Hoses on floor underneath coater mezzanine. (Design issue that will be addressed when new coater is built)
- 3 light bulbs need to be replaced on 4th floor. (Ros Segovis)
- Grate missing in floor drain behind pulpers.
- Hoses are laying around in different areas on the 2nd floor. (Mark Lappies)
- Light booth in aisle restricting access to eye wash station in coater lab.

The following are recommendations from past safety inspections:

- One issue at Edmund Street Warehouse remains:
  1. The roof will be repaired over front door now that concrete barrier has been installed.
- In the inspection winder area, concrete pillar beside baler is loosing large pieces of the concrete. (Mark evaluating) Shutdown project.
- Containers next to electrical room need to be checked and removed. George Nebel & Steve Lange
- A grate was installed on the coater due to the accident mentioned above. A concern was raised that a handle should be put on the grate so employees will have a more secure hold when lifting the grate.
- A concern was stated about roll stoppage at end of winders. Mark Lappies will investigate different types of chocks.(In progress)
- A new item in the General Safety Rules states that anyone handling over 50 lbs. must obtain help. This raised a point concerning the moving of drums.

Additional safety issues and concerns that were presented in addition to the current and past inspections are:

- A new safety rule will be added to the General Safety Rules:
  A full face shield or goggles must be worn when using high pressure cleaning equipment. The face shields will be placed in a cabinet located next to the hotsy.
- The dock plate at the Edmund Street warehouse is suspected of being unsafe. (Norm and Mark will look into this)
- There are several holes in the floor that need plugs:
  White water tank, Measurex room, #2 white water tank
  (Ros Segovis will put plugs in these areas)
- Hole in floor by paper machine scales needs to be repaired.
- Upper level grated platform by paper machine has cracks that might allow any liquid spilled to flow through.

The April Toolbox subjects will be selected by John Greenwood. Art Hilts and Jon Ward will serve as the April accident investigation team. Beth Krowl with an employee from the sign-up list will conduct the April monthly inspection. Because of an OSHA recordable accident in March, the Safety Incentive Award for March will be used in April.

It has been suggested that Lowville and Brownville exchange two employees on a monthly basis for walk around safety inspections. Cathy Porter will be scheduling this.

The subject of committee member's attendance was discussed. Many of the members are not attending the meetings on a regular basis. Norm will decide how to proceed with obtaining Safety Committee Members.

THE NEXT MEETING WILL BE

APRIL 20, 2000

AT 1:30 PM IN THE CONFERENCE ROOM.

EVERYONE PLEASE PLAN ON ATTENDING.

SAFETY MEETING AGENDA

MARCH 16, 2000

1. **SAFETY STATISTICS:**

   # DAYS WITHOUT LTA 449

   # DAYS SINCE OSHA RECORDABLE 12

2. **REVIEW OF ACCIDENTS:**

   ACCIDENTS 3
   NEAR MISSES 0
   FIRE INCIDENT REPORT 0
   ACCIDENTS AT OTHER DSI SITES 4

3. **REVIEW INTERNAL SAFETY INSPECTION**

   PREVIEW PREVIOUS RECOMMENDATIONS

4. **OTHER SAFETY ISSUES & CONCERNS**
   2 PEOPLE FROM B'VILLE TO LOWVILLE FOR WALK THROUGH - AND 2 FROM LOWVILLE TO B'VILLE. monthly basis exchange

5. **SAFETY INCENTIVE REPORT**

APRIL TOOLBOX SUBJECTS: John Greenwood

APRIL INVESTIGATION TEAM: Jon Ward
Art Hults

APRIL MONTHLY INSPECTION: Beth Howe

APRIL SAFETY INCENTIVE: use March's

	MARCH 16, 2000				
	ANGUS, JOHN SR.				
✓	CHASE, P.				
	GILCHRIST, F.				
	GILCHRIST, J.				
	GREENWOOD, J.				
	HARMYCH, T.				
✓	HILTS, A.				
	KROWL, B.				
✓	LANGE, S.				
✓	LAPPIES, M.				
	MCWAYNE, E.				
✓	NEBEL, G.				
	O'HARA, M.				
✓	SEGOVIS, R.				
✓	SHEAR, T.				
	SPENCER, T.				
✓	STORRS, J.				
✓	TOMLINSON, N.				
	TROMBLEY, D.				
	WARD, D.				
✓	WARD, J.				
	PORTER, C.				

SAFETY INSPECTION

DATE: 3-16-2000

Inspected by: G. Nebel
Tim Narrow

WAREHOUSE:

- skid of roll end wraps blocking isle to conf. Room
housekeeping soda bottles on skids
Mike Harris HP 1055 barrels not wrapped ?
ok - house keeping better - good
done extension cord hanging above floor in carpenter shop - done

CARPENTER'S SHOP:

OK

DOCK WAREHOUSE:

- broken cement near yellow railing to outside ramp.

EDMUND ST. WAREHOUSE:

done bail wire on floor - done

SAFETY INSPECTION

Cont'.

WET END PAPER MACHINE:

OK

4TH HANDS AREA:

OK

DRY END PAPER MACHINE:

art - Weight for p.m. winder pedal sticks out in isle way
done Broom not put away - leaning against I-Beam next to P.M. cal. motor.

SAFETY INSPECTION

Cont'.

BACK SIDE PAPER MACHINE:

Ok

COATER:

done Core plug on floor used to stop rolls - Done

~~= Ammonia se~~

COATER KITCHEN AREA:

Beaver old chemicals in buckets by electrical room

Steve to put out notice explaining Ammonia sensor accuracy - smell ammonia odors + no alarm

done need hook to hang hose by scale + sink

design issue holes in floor under neath mezzanine

one latch for gation mezzanine needs lubrication, does not want to move

SAFETY INSPECTION Cont'.

BOILER ROOM:

OK

4TH FLOOR:

hose across floor + draped on step ladder in middle of floor - Done

housekeeping + cleanliness much improved

3 bulbs (fluorescent) need to be replaced

3RD FLOOR:

housekeeping

garbage + trash on floor in bulk storage areas - needs a good cleanup

in general much cleaner + more organized than normal except in bulk storage area

SAFETY INSPECTION

Cont'.

2ND FLOOR:

done Dirty oil rags in plastic bag in Bob's clean Air Room - Done

done Squeegee leaning against pulper in Isle way - Done

squeegee rake missing in ~~sec~~ floor drain behind pulpers

~~the~~ blocking hose to pulper across Isle way to another open floor drain

~~the~~ hose connected to 6" PVC pipe across floor

hose across isle way under dry end of PM.

BEATER ROOM:

Yellow metal beam in broke storage area bent & loose from ceiling

MAINTENANCE SHOP:

done metal cart near main entevance by womens bathroom blocking most of door & Isle way Done

done conduit bender handle sticking out into entevance by Marks office Done

SAFETY INSPECTION

Cont'.

INSPECTION WINDER AREA:

OK

ROLL STORAGE BY LAB ENTRANCE:

OK

LAB:

Coater lab

done - chair in isle

needs to be removed - light booth in Isle restricting access to eye wash station

The following are recommendations from past safety inspections:

done Guard on reel at dry end of paper machine needs to be fixed. Down day project.

done Empty dye barrels need to be taken care of on backside of 2nd section.

done Extension cords and fans creating a mess on backside of 1st section.

- Two issues at Edmund Street Warehouse remain: concrete barrier

1. Roof over front door is gone and consequently water freezes on ramp. A ~~baluster~~ will be installed to prevent trucks from hitting the roof. Once this is done, the roof will be repaired.

done 2. A rain gutter is needed on the back.(In progress)

- In the inspection winder area, concrete pillar beside baler is loosing large pieces of the concrete. (Mark evaluating) Shutdown project.
- Containers next to electrical room need to be checked and removed. George Nebel & Steve Lange
- A grate was installed on the coater due to the accident mentioned above. A concern was raised that a handle should be put on the grate so employees will have a more secure hold when lifting the grate.

done Steve Lange checking on PPE for oxalic acid.

done An employee was observed not wearing the proper PPE when handling acetic acid. A notice will be put in log book.

- A concern was stated about roll stoppage at end of winders. Mark Lappies will investigate different types of chocks. In progress
- A new item in the General Safety Rules states that anyone handling over 50 lbs. must obtain help. This raised a point concerning the moving of drums. ~~To be resolved and presented at next safety meeting.~~

done In response to the accident report involving improper placement of keyboard in relation to computer, a Toolbox subject will be on ergonomics.

INCIDENT INVESTIGATION REPORT

This form must be completed in it's **entirety**. **Do not** write in the shaded areas. A First Report of Injury must accompany this Incident Investigation report.

Brownville

1. Employee Involved: Reid Hummer
2. Date of Incident: 2-23-00
3. Time of Incident: 2:15 pm
4. Date Reported: 2-23-00
5. Was report to Supervisor or First Aid Delayed? [ ] Yes [X] No [ ] If Yes, why?
6. Employee Regular Occupation: 3 helper
7. Regular Occupation at Time of Incident? [X] Yes [ ] No [ ] Other
8. Shift Worked: 7-3
9. Time Shift Began: 7:00 AM
10. Number of Hours Employee Worked Before Injury: 7
11. Specific Task Being Performed: TANK cleaning
12. Employee Worked Status: [X] First Aid [ ] Sent to O.H. & R. [ ] Sent to Hospital
13. Did Anyone Come in Contact with Blood or Body Fluids? [ ] Yes [X] No
14. Type of Equipment:
15. Description of Incident: Reid was using a hotsy to clean tank.
16. Nature and Extent of Injury or Damage: Small chip of coating blew into Right eye. removed chip with swab.
17. Witness Signature: Mike O'Hara
18. Employee Signature: Reid S. Hummer 2-23-00

REVIEW BY TEAM LEADER

20. Check One of the Following: [ ] Unsafe Act [x] Unsafe Condition [ ] Equipment Failure [ ] Poor Housekeeping
21. Was Employee Trained to Perform Task? [ ] Yes [X] No
22. Investigation Revealed: Should have been wereing face Sheild
Reid was wereing Safety Glasses
- Safety rules do not state need for face shield when using high pressure clegning equipment
23. Corrective Action Taken or Recommended:
- change safety rules to require use of face shield when using high pressure cleaning equipment
use face Sheild cleaning tanks with hotsy.
- Issue face shields to coater operators + 3rd station helpers.
- Install small cabinet on coater kitchen mezzanine for face shields + other safety supplies.
24. Type of Injury: [X] Recordable [ ] Recordable with Lost Time [X] First Aid [ ] Close Call - No Injury

REXAM

Safety Flash

Coated Films and Paper Sector

X Check if Initial Report ☐ Check if Update Report

An incident occurred within the Coated Films and Paper Sector that you need to know about. Below are details that you can review and apply to your specific operations. Please review.

Location of Facility:	Brownville
Date and Time of Incident:	March 3, 2000 6:25 PM
Contact for More Information:	Norm Tomlinson
Telephone Number:	(315) 782-5800 Ext. 18

What Happened?

While attempting to slow down a 35" dia. roll of paper as it traveled down an incline, the injured employee was walking ahead of the roll exerting his body weight against it. The employee's right heel contacted the roll and became wedged underneath, causing his foot to bend forward. The employee was taken to Samaritan Hospital for evaluation. X-rays confirmed a fractured metacarpal (forefoot) bone.

Initial Findings:

- Injured employee had his back against the roll. The recommended technique is to face the roll.
- Roll size: 35" diameter, 2000 lbs.
- The employee was hired 10/99 and has worked as an Inspection Winder Helper for the past two months.
- The injured employee was distracted by a fellow worker while attempting to slow down the roll.
- The employee had worked 11.5 hours prior to the incident.

Probable Causes:

- Unsafe act / Inadequate training - The injured employee was not following the generally accepted procedure and was not fully aware of the potential hazards.
- Unsafe Procedure – due to the size of rolls produced and the incline of the wrapping station exit ramp, considerable force must be applied to stop the finished paper rolls.
- Inadequate process design - The roll wrapping station is not at floor level and adequate mechanical provisions for stopping and/or lowering rolls are not present.

Corrective Actions/Actions to Prevent Reoccurrence:

- Install suitable roll stops and/or lowering devices. This will be completed during the mill's July'00 maintenance outage.
- Change roll handling procedures – Employees must stay clear of moving rolls.
- Provide temporary roll stops.
- Review incident with all employees.

INCIDENT INVESTIGATION REPORT

This form must be completed in it's **entirety**. **Do not** write in the shaded areas. A First Report of Injury must accompany this Incident Investigation report.

Brownville

1. Employee Involved: Jim Warner 2. Date of Incident: 3/3/00 3. Time of Incident: 6:25 P.M.

4. Date Reported: 3-3-00 5. Was report to Supervisor or First Aid Delayed? [ ] Yes [X] No If yes, why:

6. Employees Regular Occupation: Line Helper/Wrapper 7. Regular Occupation at Time of Incident? [ ] Yes [ ] No [ ] Other 8. Shift Worked? 7:00 A.M. to 3:30 P.M.

9. Shift Starting Time: 7:00 A.M. 10. Number of Hours Employee Worked Before Injury: 11½ hrs. 11. Specific Task Being Performed: was stopping roll

12. Employee Medical Status: [X] First Aid [ ] Sent to O.H. & .R. [ ] Sent to Hospital 13. Did Anyone Come in Contact with Blood or Bodily Fluids? [ ] Yes [X] No 14. If Yes, Employee Name:

15. Description of Incident:

Jim had just wrapped a roll of paper. He rolled the roll down the ramp, and was in front of roll, to stop it. He had his back to roll, and it caught his heel on shoe and bent his foot forward.

16. Nature/Extent of Injuries or Property Damage:

His foot swollen up some. Put some ice packs on it. Sent him home.

17. Team Leader Signature: Fred Hilchrist 18. Employee Signature: [signature] 19. Date: 3-3-00

REVIEW BY TEAM LEADER

20. Check One of the Following: [X] Unsafe Act [x] Unsafe Condition [ ] Equipment Failure [ ] Poor Housekeeping

21. Was the employee using medication when the accident occurred? NO

22. Is there a possibility that the accident occurred in the employees mind? NO

23. Were there Witnesses? [ ] Yes [X] No 24. If Yes, the Witness Name(s): 25. Was a Statement Obtained From the Witness? [ ] Yes [ ] No

26. Investigation Revealed:

People are stopping Rolls ~~[illegible]~~ by standing in front of them
Most of the time
36" DIA. 2,300# Roll

27. Corrective Action Taken or Recommended:

Management has been looking into a roll stopper. (SHUT DOWN)
Install mechanical Roll stop
NOTICE FROM NORM STATING - NO EMPLOYEE IS TO ATTEMPT TO STOP A ROLL AT INSPECTION WINDER RA
KEEP ONE ROLL AT THE BASE OF RAMP TO STOP ROLLS
MAINTENANCE MADE A WOODEN RAMP (STOP) FOR ROLLS

28. Type of Injury: [X] Recordable [ ] Recordable with Lost Time [ ] First Aid [ ] Close Call - No Injury

INCIDENT INVESTIGATION REPORT

This form must be completed in it's **entirety**. **Do not** write in the shaded areas. A First Report of Injury must accompany this Incident Investigation report.

Brownville

1. Employee Involved: D. Raines
2. Date of Incident: 3/12/00
3. Time of Incident: 6:50 AM
4. Date Reported: 3/12/00
5. Was report to Supervisor or First Aid Delayed? [ ] Yes [X] No — If yes, why:
6. Employees Regular Occupation: data analyst
7. Regular Occupation at Time of Incident? [X] Yes [ ] No [ ] Other
8. Shift Worked? 7-3
9. Shift Starting Time: 7 AM
10. Number of Hours Employee Worked Before Injury: 0
11. Specific Task Being Performed: walking in to work
12. Employee Medical Status: [ ] First Aid [ ] Sent to O.H. & .R. [ ] Sent to Hospital
13. Did Anyone come in contact with blood or Bodily Fluids? [ ] Yes [X] No
14. If Yes, Employee Name:
15. Description of Incident: Walking into driveway entrance off main St. Just ~~slight~~ at bottom of hill she slipped + fell towards left side.
16. Nature/Extent of Injuries or Property Damage: Banged left arm + hip/butt. No cuts but is sore.
17. Team Leader Signature: Elizabeth A. Kowl
18. Employees Signature: Donna L. Raines
19. Date: 3-13-00

REVIEW BY TEAM LEADER

20. Check One of the Following: [ ] Unsafe Act [x] Unsafe Condition [ ] Equipment Failure [ ] Poor Housekeeping
21. Was the employee using medication when the accident occurred?
22. Is there a possibility that the accident occurred in the employees home?
23. Was there a Witness? [X] Yes [ ] No
24. If Yes, the Witness Name is? Tim Bennett
25. Was Statement Obtained from the Witness? [ ] Yes [X] No
26. Investigation Revealed:
- parking lot was not sanded or plowed
- side walk wasn't plowed, however the end of sidewalk usually has a large ice ~~path~~ patch.
27. Corrective Action Taken or Recommended:
28. Type of Injury:
[ ] Recordable [ ] Recordable with Lost Time [ ] First Aid [X] Close Call - No Injury

DATE: April 21, 2000

TO: JE Angus, Fred Gilchrist, Jason Gilchrist, John Greenwood*, Terry Harmych, Art Hilts*, Beth Krowl*, Steve Lange, Mark Lappies, Ed McWayne, George Nebel*, Mike O'Hara*, Ros Segovis*, Tim Shear*, Tom Spencer, Jim Storrs*, Norm Tomlinson*, Dennis Trombley, Darlene Ward, Jon Ward*, Cathy Porter Jason Chase* Cathy Porter

CC: Joe Benish, Bill Hughes

From: Phyllis Chase*

Subject: Safety Meeting

The monthly Safety Meeting was held on Thursday, April 20, 2000 at 1:30 pm. The minutes from the meeting are as follows:

Brownville has gone 20 days without a losttime accident and 20 days since the last OSHA recordable.

Since the last meeting, there were three accidents- the first two being OSHA recordable and the second a losttime accident:

- While threading the paper machine saturator, the injured employee was directing the web into the saturator nip. When the web entered the nip, the employee either did not release the tail immediately or did not pass his hand along the correct path causing his right index and middle finger to enter the nip. Both finger tips were crushed and had to be amputated at the first knuckle.
- While removing an offset in a roll on the inspection winder, the winder helper grasped a slab of paper at the outgoing side of the nip between the rewound roll and the rider roll. When the operator released the pressure on the rider roll, the rolls moved in reverse causing the helpers hand to be pinched between the two rolls. A crush wound resulted to the thumb requiring surgery and stitches.
- Coater operator was cleaning 2nd station and nicked right index finger at first knuckle on edge of rod holder.

There was one near miss when an employee got off a towmotor without setting the parking brakes. The tow motor started to roll and employee jumped on to stop it. A new safety rule has been added to the General Safety Rules covering this situation.

OVERALL GOAL	OVERALL PERIOD 03	2000 YEAR TO DATE	1999 TOTAL
3.0	16.2	16.2	5.2

The following are recommendations from the current safety inspection:

- Eyewash in warehouse had expired solution that was removed and needs to be replaced.
- Floor in area where NCR's are stored is uneven. T. Shear, N. Tomlinson and B. Krowl checking.
- There is a bolt sticking up in the floor at wet end of paper machine.
- A chain needs to be installed on light at dry end of paper machine.
- Drinking fountain on paper machine was dirty. R. Segovis cleaned and P. Chase with have janitors clean it on a regular basis.
- Barrels are being removed from pallets by hand in coater kitchen area. Drum truck is on order.
- 2nd floor ramp room needs some racks built to try and contain the clutter.
- Hand rail is needed on sludge press. Slippery when wet.

The following are recommendations from past safety inspections:

- 3 light bulbs need to be replaced on 4th floor. R. Segovis
- Edmund Street warehouse still needs roof repaired over front door.
- Containers next to electrical room need to be checked and removed. G. Nebel and S. Lange
- The dock plate at the Edmund Street warehouse needs to be checked. N. Tomlinson
- Upper level grated platform by paper machine has cracks that might allow any liquid spilled to flow through. R. Segovis repaired but it is uncertain whether it would contain the liquids spilt.

Shutdown projects:

- In the inspection winder area, concrete pillar beside baler is loosing large pieces of the concrete.

Additional safety issues and concerns that were presented in addition to the current and past inspections are:

- A new safety rule will be added to the General Safety Rules:
  When cleaning and working around 2nd coating station, rod must be in holder.
- Parking brake on Clark truck doesn't work well.
- A tool will be purchased for opening 5 gallon pails.
- Some basic first aid will be presented at one of the monthly informational meetings.
- A sign-up notice will be posted for employees interested in taking a CPR and first aid course.
- Each employee will be asked to describe what hazards they believe are associated with their job.
- A weekly list of safety concerns will be published and prioritized. Each employee will be asked to submit a safety work order describing the safety concern that they have.

It was suggested that each new employee be required to attend a Safety Meeting and do a monthly inspection with one of the Safety Committee Members.

The May Toolbox subjects will be selected by Jason Chase. Jim Storrs and Art Hilts will serve as the May accident investigation team. John Greenwood and Jason Chase will conduct the May monthly inspection. Tim Shear will select the May Safety Incentive Award.

THE NEXT MEETING WILL BE :

MAY 18, 2000

AT 1:30 PM IN THE CONFERENCE ROOM.

EVERYONE PLEASE PLAN ON ATTENDING.

	APRIL 20, 2000				
	~~ANGUS, JOHN SR.~~				
✓	CHASE, P.				
	GILCHRIST, F.				
	GILCHRIST, J.				
✓	GREENWOOD, J.				
	HARMYCH, T.				
✓	HILTS, A.				
✓	KROWL, B.				
	LANGE, S.				
	LAPPIES, M.				
	MCWAYNE, E.				
✓	NEBEL, G.				
✓	O'HARA, M.				
✓	SEGOVIS, R.				
✓	SHEAR, T.				
	SPENCER, T.				
✓	STORRS, J.				
✓	TOMLINSON, N.				
	TROMBLEY, D.				
	WARD, D.				
✓	WARD, J.				
	PORTER, C.				
✓	Chase, J.				
	Haselton, E.				
	Parody, M.				

SAFETY MEETING AGENDA

APRIL 20, 2000

1. SAFETY STATISTICS:

   # DAYS WITHOUT LTA 20

   # DAYS SINCE OSHA RECORDABLE 20

2. REVIEW OF ACCIDENTS:

   ACCIDENTS 4
   NEAR MISSES 1
   FIRE INCIDENT REPORT 0
   ACCIDENTS AT OTHER DSI SITES 5

3. REVIEW INTERNAL SAFETY INSPECTION

   PREVIEW PREVIOUS RECOMMENDATIONS

4. OTHER SAFETY ISSUES & CONCERNS

5. SAFETY INCENTIVE REPORT

MAY TOOLBOX SUBJECTS: Jason Chase

MAY INVESTIGATION TEAM: Jim Storrs
Art Hilts

MAY MONTHLY INSPECTION: John Greenwood
Jason Chase

MAY SAFETY INCENTIVE: Tim Shear

(1) Art. Safety rule for road holder on crane broke on crane
(2) parking brake on crane won't work well.
(3) Purchase Tool for opening pails - Norm
(4) First Aid posters during info mtgs
(5) Notice of CPR & first aid training
(6) All emp. wear gloves each job.

REXAM

Safety Flash

Coated Films and Paper Sector

X Check if Initial Report ☐ Check if Update Report

An incident occurred within the Coated Films and Paper Sector that you need to know about. Below are details that you can review and apply to your specific operations. Please review.

Location of Facility:	Brownville
Date and Time of Incident:	March 3, 2000 6:25 PM
Contact for More Information:	Norm Tomlinson
Telephone Number:	(315) 782-5800 Ext. 18

What Happened?

While attempting to slow down a 35" dia. roll of paper as it traveled down an incline, the injured employee was walking ahead of the roll exerting his body weight against it. The employee's right heel contacted the roll and became wedged underneath, causing his foot to bend forward. The employee was taken to Samaritan Hospital for evaluation. X-rays confirmed a fractured metacarpal (forefoot) bone.

Initial Findings:

- Injured employee had his back against the roll. The recommended technique is to face the roll.
- Roll size: 35" diameter, 2000 lbs.
- The employee was hired 10/99 and has worked as an Inspection Winder Helper for the past two months.
- The injured employee was distracted by a fellow worker while attempting to slow down the roll.
- The employee had worked 11.5 hours prior to the incident.

Probable Causes:

- Unsafe act / Inadequate training - The injured employee was not following the generally accepted procedure and was not fully aware of the potential hazards.
- Unsafe Procedure – due to the size of rolls produced and the incline of the wrapping station exit ramp, considerable force must be applied to stop the finished paper rolls.
- Inadequate process design - The roll wrapping station is not at floor level and adequate mechanical provisions for stopping and/or lowering rolls are not present.

Corrective Actions/Actions to Prevent Reoccurrence:

- Install suitable roll stops and/or lowering devices. This will be completed during the mill's July'00 maintenance outage.
- Change roll handling procedures – Employees must stay clear of moving rolls.
- Provide temporary roll stops.
- Review incident with all employees.

REXAM

Coated Films and Paper Sector

Safety Flash

X Check if Initial Report ☐ Check if Update Report

An incident occurred within the Coated Films and Paper Sector that you need to know about. Below are details that you can review and apply to your specific operations. Please review.

Location of Facility:	Brownville
Date and Time of Incident:	8:00 AM
Contact for More Information:	Norm Tomlinson
Telephone Number:	(315) 782-5800

What Happened?

While threading the paper machine saturator, the injured employee was directing the web into the saturator nip. When the web entered the nip, the employee either did not release the tail immediately or did not pass his hand along the correct path causing his right index and middle finger to enter the nip. Both finger tips were crushed. The injuries resulted in the amputation of both finger tips at the first knuckle and will result in lost time.

Initial Findings:

- The injured employee is a Shift Supervisor and a 28 year veteran paper maker.
- The paper machine was producing a standard grade (7561-010, Kivar 2 base) at the time of the incident. The machine speed was within the normal operating range (440fpm).
- The injured employee was following the accepted procedure for threading the saturator.
- All equipment was functioning properly at the time of the accident.
- When threading this section of the Paper Machine, the Backtender first threads the dancer roll and then passes the tail to the Supervisor who manually feeds the tail into the saturator nip.
- The injured employee and the Backtender on duty at the time of the incident were not accustomed to working with one another. Subtle differences in techniques may have contributed to this accident.
- Prior to the date of the incident, the employee had been scheduled off for four days. The employee had worked approximately one hour prior to the incident.

Probable Causes:

The current method for threading the saturator requires operators to pass their hand in close proximity to the in-going nip. While this has been the accepted method for threading the saturator since its installation, it requires considerable concentration, dexterity, eye-hand coordination and good reflexes. As opportunity for error exists, this procedure can not be considered inherently safe.

Contributing Factors:

- Web Break
- The injured employee and the PM Backtender (who assists with saturator threading) were not accustomed to working with one another. Slight differences in technique may have contributed to this accident.

Corrective Actions/Actions to Prevent Reoccurrence:

- Ascertain best practices (with regard to tail threading in general) through the involvement of all experienced operators. Document and retrain.
- Aggressively pursue the design and installation of automated threading devices for the saturator section of the Paper Machine.
- A prototype air shoe has been installed to aid threading at the saturator. Although not an ideal solution, this device will act as a nip guard and hopefully yield design criteria for a permanent solution.
- This incident has been reviewed with all employees. The root causes and preventative actions will also be reviewed in detail by the Plant Safety Committee.

REXAM

Safety Flash

Coated Films and Paper Sector

X Check if Initial Report ☐ Check if Update Report

An incident occurred within the Coated Films and Paper Sector that you need to know about. Below are details that you can review and apply to your specific operations. Please review.

Location of Facility:	Brownville
Date and Time of Incident:	3/31/00 3:10 AM
Contact for More Information:	Norm Tomlinson
Telephone Number:	(315) 782-5800 ext. 18

What Happened? Lost time Accident. While removing an offset in a roll on the Inspection Winder, the Winder Helper grasped a ¼" slab of paper at the outgoing side of the nip between the rewound roll and the rider roll. When the Winder operator released the pressure on the rider roll, the rolls moved in reverse causing the Helpers thumb to be pinched between the two rolls. A crush wound resulted requiring sutures.

Initial Findings:

- The roll ejector had not been retracted prior to starting the winder.
- When the rewound roll reached a diameter of 20", it contacted the ejector causing the offset.
- The winder was stopped immediately and the operator moved the ejector control to the retract position. At this time, the operator did not realize that the rewound roll prevented the ejector from retracting.
- When the Operator released the pressure on the rider roll, the rewound roll moved forward slightly due to the stored energy in the ejector mechanism. The roll moved just far enough to allow the ejector to retract completely. In doing so, it caused the rolls to move abruptly in the reverse direction.
- The injured Employee had worked 4 hours prior to this incident.
- All equipment was functioning properly and the injured employee was following established procedures.

Probable Causes:

- Operator error – The winder was started with the roll ejector in the extended position.
- Equipment design – This winder was not designed with interlocks on the roll ejector.
- Unsafe procedure – Although the pinch point in this case was an outgoing nip by design, stored energy or an electrical malfunction could result in reverse rotation. The current procedure allows operators to work too close to this hazard.

Corrective Actions/Actions to Prevent Reoccurrence:

- Interlock the roll ejector with the winder drive (Paper Machine and Inspection Winders) to prevent operation when in the extended position. (completed 3/31/00).
- Gain a better understanding of the reasons for the operator error and take appropriate actions.
- Change safety rules / procedures to provide guidelines for outgoing nips.
- Review incident with all employees.

INCIDENT INVESTIGATION REPORT

This form must be completed in it's **entirety**. **Do not** write in the shaded areas. A First Report of Injury must accompany this Incident Investigation report.

Brownville

1. Employee Involved: D. Ward 2. Date of Incident: 4-1-00 3. Time of Incident: Approx 2:30 PM

4. Date Reported: 4-1-00 5. Was report to Supervisor or First Aid Delayed? NO If yes, why:
[ ] Yes [ ] No

6. Employees Regular Occupation: 7. Regular Occupation at Time of Incident? 8. Shift Worked?
Coater Operator [ ] Yes [ ] No [X] Other Helping clean 2nd station 7-7 days

9. Shift Starting Time: 10. Number of Hours Employee Worked Before Injury: 11. Specific Task Being Performed:
7:00 am Approx 8 Helping clean 2nd Station

12. Employee Medical Status: 13. Did Anyone come in contact with blood or Bodily Fluids? 14. If Yes, Employee Name:
[X] First Aid [ ] Sent to O.H. & .R. [ ] Sent to Hospital [ ] Yes [ ] No

15. Description of Incident:
cleaning 2nd station, Did Not Notice was out of Rod Holder & Nicked right hand Index Finger at First Nuckle on edge of Rod Holder.

16. Nature Extent of Injuries or Property Damage:
Small Nick cut

17. Team Leader Signature: 18. Employee Signature: Darlene D. Ward 19. Date: 4-1-00

REVIEW BY TEAM LEADER

20. Check One of the Following: [ ] Unsafe Act [X] Unsafe Condition [ ] Equipment Failure [ ] Poor Housekeeping

21. Was the employee taking medication when the accident occurred? 22. Is there a possibility that the accident occurred by the employees fault?

23. Was there a Witness? [ ] Yes [X] No 24. If Yes, the Witness Name is: 25. Was a Statement Obtained from the Witness? [ ] Yes [ ] No

26. Investigation Revealed:
2nd station operator said he was in process of cleaning Rod ~~Holder~~ Coater op went up to help finish cleaning station she was scraping Rod Holder with Hand scraper when her 1st Knuckle right hand index finger struck Rod Holder - scraped knuckle

27. Corrective Action Taken or Recommended:
Notice Put up to be sure the Rod is in the Holder when cleaning up

28. Type of Injury:
[ ] Recordable [ ] Recordable with Lost Time [X] First Aid [ ] Close Call - No Injury

REXAM DSI
BRIDGE STREET
BROWNVILLE, NY 13634

NEAR MISS REPORT

DATE OF INCIDENT: 4-9-00

TIME OF INCIDENT: 5:00 pm

DESCRIPTION OF INCIDENT: Employee got off towmotor to adjust forks. Towmotor was on a small incline towmotor started rolling backwards. Employee reached across seat to set parking brake. Brake did not hold towmotor still moving backwards. Employee jumped on towmotor to stop it. Adjusted parking brake it held.

CAUSE OF INCIDENT: employee did not set parking brake before getting off towmotor.

CORRECTIVE ACTION: instructed employee not to get off towmotor with out setting packing brake.

Mike O'Hara
SIGNATURE OF EMPLOYEE REPORTING INCIDENT

SAFETY INSPECTION

DATE: 4/6/00

Inspected by: Mike Alden
Beth Krowl

WAREHOUSE:

done Pallet with black top patch falling off pile. Fixed.
NR Exit door on Bridge St side - does it open?
done Cement crumbling on support beam
NR Rolls not stored 24" From walls
Steve Floor unlevel by NCR's
Steve Scrap parts of [illegible] machining by NCR's
done Paper (Lenox room)
done Smoking should be hung up -
Steve wash expired 1/00
TS, NT OK

CARPENTER'S SHOP:

roll storage area is nice + clean!
NR Blade exposed on core cutter - cover needed?

DOCK WAREHOUSE:

good!

EDMUND ST. WAREHOUSE:

didn't do

SAFETY INSPECTION Cont'.

WET END PAPER MACHINE:

OK
bolt in floor

4TH HANDS AREA: valves

Could label lines better

Fix ammonia storage box & label better

DRY END PAPER MACHINE:

* install chain to hang light from ☆ when maint. changes rolls on stacks

bolt on floor sticking out 3rd hand area

SAFETY INSPECTION Cont'.

BACK SIDE PAPER MACHINE:

done Cluttered - coffee cans, plastic buckets
have Curries
clean drinking fountain - dirty janitors?

COATER:

~~OK~~ vaccum lines on floor of back of stacks - tripping hazard

done replace insulation around pipes - 2nd station

dump valve for shaft to core - in case of emergency, to release air from system

~~OK~~ Inspection area dirty

COATER KITCHEN AREA:

drum truck ordered not safe taking barrels off pallets - back injury

done remove mixing pump - replace with lutz pump?

hoses on floor

SAFETY INSPECTION Cont'.

BOILER ROOM:

None locker area somewhat cluttered - old computer

4TH FLOOR:

No lighting in far right corner by elevator. doesn't look like water leak going down side of support column by Stairs.

3RD FLOOR:

None ~~Etc~~. Doorway going into 3rd floor at bottom of stairs - piece on left falling off.

SAFETY INSPECTION Cont'.

Maybe already done

2ND FLOOR:

2. Somewhat cluttered in ramp room but not sure if its really a safety issue or not. Also not sure how to fix it.

Note/Observation: We are storing a lot of old equipment, pipes, etc. on these lower floors that look like they're never used. Should we get rid of some of this stuff gradually to clean up the clutter + free up space?

BEATER ROOM:

~~N/A~~ Hand rail needed on sludge press - slippery when wet

MAINTENANCE SHOP:

problem

shelf on tool box - could roll off (mark secured in place)

decluttered

some cans left out - drill press

SAFETY INSPECTION

Cont'.

INSPECTION WINDER AREA:

GK

ROLL STORAGE BY LAB ENTRANCE:

OK

LAB:

OK

Alley way - plow should be put someplace else.

The following are recommendations from past safety inspections:

- Skid of roll end wraps blocking aisle to conference room.
- ~~HP~~ 1055 barrels on a skid not banded or wrapped. (Harold Hine)
- ~~Bro~~ken cement near yellow railing to outside ramp at dock warehouse should be removed.
- Weight for paper machine winder pedal sticks out in aisle.
- Accuracy of ammonia sensor in question. Ammonia odors can be detected but the alarm doesn't sound. (Steve Lange will put out a notice explaining)
- Hoses on floor underneath coater mezzanine. (Design issue that will be addressed when new coater is built)
- 3 light bulbs need to be replaced on 4th floor. (Ros Segovis)
- ~~G~~rate missing in floor drain behind pulpers.
- ~~H~~oses are laying around in different areas on the 2nd floor. (Mark Lappies)
- ~~L~~ight booth in aisle restricting access to eye wash station in coater lab.
- One issue at Edmund Street Warehouse remains:
  1. The roof will be repaired over front door now that concrete barrier has been installed.
- In the inspection winder area, concrete pillar beside baler is loosing large pieces of the concrete. (Mark evaluating) Shutdown project.
- Containers next to electrical room need to be checked and removed. George Nebel & Steve Lange
- A grate was installed on the coater due to the accident mentioned above. A concern was raised that a handle should be put on the grate so employees will have a more secure hold when lifting the grate.
- A concern was stated about roll stoppage at end of winders. Mark Lappies will investigate different types of chocks.(In progress)
- A new item in the General Safety Rules states that anyone handling over 50 lbs. must obtain help. This raised a point concerning the moving of drums.
- A new safety rule will be added to the General Safety Rules:
  A full face shield or ~~g~~ and safety glasses or goggles must be worn when using high pressure cleaning equipment.
  The face shields will be placed in a cabinet located next to the hotsy.
- The dock plate at the Edmund Street warehouse is suspected of being unsafe. (Norm and Mark will look into this) Norm will check metal plates.
- There are several holes in the floor that need plugs:
  White water tank, Measurex room, #2 white water tank
  (Ros Segovis will put plugs in these areas)
- Hole in floor by paper machine scales needs to be repaired.
- Upper level grated platform by paper machine has cracks that might allow any liquid spilled to flow through.

* Shut down on bottom of list.

FIRST AID KIT
MONTHLY INSPECTION

KIT #	LOCATION	REMARKS
1	OVERHEAD DOOR BY BOILERHOUSE	need 2 ice packs Done
2	COATER	need 4x4s Aspirin ice packs Antacid Done
3	BLACKSMITH SHOP	OK
4	MAINTENANCE SHOP	Antacid - 4x4's Done
5	FOREMAN'S OFFICE	OK
6	MACHINE WINDER (FRONT DOOR)	OK
7	50 % LAB	OK
8	2nd FLOOR BY STAIRS	OK
9	3rd FLOOR BY STAIRS	OK
10	SHIPPING WAREHOUSE	OK
11	CARPENTER SHOP	OK 4x4's Done
12	HEATED WAREHOUSE (LENNOX RM.)	OK
13	MAIN OFFICE	OK

INSPECTED BY: Jim Stowns DATE: 4-12-06

REXAM DSI - Brownville

Safety Project Priority Assignment

Complexity	1-10 1 = 10 =	Project / Repair is easily completed with minimal resources. Complex, requires extensive engineering and DSI Board approval.
Severity	1-10 1 = 10 =	Hazard could result in minor injuries. An accident would result in severe or life threatening injuries.
Exposure	1-10 1 = 10 =	Hazard is rarely encountered and expected to impact few employees. Hazard is encountered routinely by many employees.

Safety Project Priority = Complexity x Severity x Exposure

Weekly list published
Safety Comm. prioritize
Safety work order

The "Look At" Guide

The things that must be "looked at" fall into twenty-four broad categories. For any given area, not all of these categories necessarily apply, or are all of equal importance.

1. Atmospheric Surroundings: Hazardous conditions of dust, gases, fumes, sprays, etc.
2. Chemical Substances: All liquids and solids that are toxic in nature.
3. Containers: All objects for storage of materials, barrels, boxes, bottles, cans, etc.
4. Conveyor Systems: Any systems that transports materials to or from operations or processes.
5. Electrical Conductors and Apparatus: Wires, cables, switches, controls, transformers, lamps, batteries, fuses, etc.
6. Engines and Prime Movers: Sources of mechanical power, excluding electric motors, steam engines, gas engines, etc.
7. Elevators, Escalators, and Manlifts: Require no further explanation.
8. Firefighting Equipment: All firefighting equipment, plus sprinklers, fire plugs, etc.
9. Guards and Safety Devises: All removable and fixed guards, and safety devices, or attachments, excluding personal protective apparel.
10. Hand Tools, All Kinds: Equipment that is held or carried when in use. Powered
11. Hoisting Equipment: Cranes, derricks, power shovels, dredges, air hoists, hydraulic jacks, etc.
12. Flammables and Explosives: Require no further explanations.
13. Machinery and Pars Thereof: Power equipment that processes or modifies marerials, agitators, grinders, forging presses, pulverizing machines, drilling machines, etc.
14. Materials, Raw or Processed: Materials and supplies essential to production of finished product, excluding materials elsewhere classified.
15. Mechanical Power Transmission Systems: Shafts, bearings, gears, pulleys, drums, cables, belts, sprockets, ropes, chains, etc., when used to

transmit power.

16. Overhead Structures and Equipment: Any structural part or equipment that may fall from above.

17. Personal Portective Apparel: Goggles, gloves, aprons, leggings, etc.

18. Pressure Vessels, Boilers, and Pipes: Objects subject to internal pressure from compression of liquids, or gases.

19. Pumps, Compressors, Blowers, and Fans: Objects that move or compress liquids, air, or gases.

20. Shaftways, Pits, Sumps, and Floor Openings: All types of openings into which persons may stumble or fall.

21. Walking or Standing Surfaces: Floors, aisles, stairs, platforms, ramps, roads, scaffolds, ladders, etc.

22. Warning and Signals Devices: Direct communciation systems such as radio, telephones, buzzers, bells, lights, etc.

23. Vehicles and Carrying Equipment: Trucks, cars, trains, motorized carts, and nonmotorized equipment for transporting materials.

24. Miscellaneous: Other potentially-hazardous objects or conditions that do not fall into the above categories.

The "Look For" Guide

The separate items of the guide have been listed under five major categories.

1. Look for guarding of agents, such as:
   a. Missing or inadequate guards against being "struck by."
   b. Missing or inadequate guards against "striking against."
   c. Missing or inadequate guards against being "caught on, in, or between."
   d. Missing or inadequate guards against "falling from or onto."
   e. Lack of or faulty support, bracing, shoring, etc.
   f. Missing or faulty warning or signal device.
   g. Missing or faulty automatic control device.
   h. Missing or faulty safety device.

2. Look for structual defects and material characteristics, such as:
   a. Sharp-edged, jagged, splintery, etc., conditions/
   b. Worn, frayed, cracked, broken, etc., conditions.

c. Slippery conditions (for gripping or walking).
d. Dull, irregular, mutilated, etc., conditions.
e. Uneven, rough, pocked, or with holes.
f. Decomposed or contaminated conditions.
g. Flammable or explosive characteristics.
h. Poisonous characteristics (by swallowing, breathing, or contacting).
i. Corroded or eroded conditions.

3. Look for functional defects, such as:

a. Susceptibility to breakage, collapse,etc.
b. Susceptibility to tipping, falling, etc.
c. Susceptibility to rolling, sliding, slipping,etc.
d. Leaking of gases, fumes, or fluids.
e. Excessive heat, noise, vibration, fumes, sparking, etc.
f. Failure of agency to operate.
g. Erratic, unpredictable performance of agent.
h. Lack of adequate electrical grounding.
i. Operation that is too fast or too slow.
j. Low voltage leaks.
k. Signs of excessively high or low pressure.
l. Throwing off of parts, particles, materials, etc.
m. Standard indictions of need for special attention.

4. Look for ventilation, illumination, noise, such as:

a. Noxious fumes or gases.
b. Flammable or explosive fumes or gases/
c. Insufficient illumination.
d. Excessive glare from light source.
e. Hazardous dusts or atomspheric particles.
f. Hazardous temperature condition.
g. Excessive noise.

5. Look for storage, poisitioning and arrangement of agent, such as:

a. Improperly secured against sudden movement, such as: falling, slipping, rolling, tipping, sliding, etc.
b. Unsafe storage that permits easy contact by men or equipment.
c. Unsafe exposure to heat, mositure, vibration, flame, sparks. chemical action, electric current, etc.
d. Congestion of traffic or working space.
e. Unsafe attachment of objects to agent.

f. Unsafe placement of objects in agent.
g. Unsafe distribution of objects around agent.
h. Protruding objects.
i. Use of unsafe storage containers.
j. Faulty ventilation of stored materials/
k. Unsafe traffic layout.
l. Poor housekeeping.

The preceding list of conditons to look for does not include every possible hazard.

DATE: JANUARY 21, 2000

TO: JOHN ANGUS SR., FRED GILCHRIST, JASON GILCHRIST, JOHN GREENWOOD, TERRY HARMYCH, ART HILT*, BETH KROWL*, STEVE LANGE*, MARK LAPPIES, ED MCWAYNE, GEORGE NEBEL*, MIKE O'HARA, ROS SEGOVIS*, TIM SHEAR*, TOM SPENCER, JIM STORRS*, NORM TOMLINSON*, DENNIS TROMBLEY, DARLENE WARD, JON WARD, CATHY PORTER*

FROM: PHYLLIS CHASE*

*DENOTES ATTENDEES

CC: JOE BENISH, BILL HUGHES

SUBJECT: SAFETY MEETING

The monthly Safety Meeting was held on Thursday, January 20, 2000 at 1:30 pm. The minutes from the meeting are as follows:

Brownville has gone 393 days without a losttime accident and 23 days since the last OSHA recordable.

Since the last meeting , there were two accidents:

- Employee sustained a 2 inch laceration to right thigh while cutting up plastic tote bin liners for disposal.
- Employee was filling rod holder with coating, he stepped in a hole approximately 15" in diameter that allows journal on 1st station backing roll to pass through when being changed.

Three near misses were reported:

- Employee was exiting warehouse on a clamp truck when he became aware a tractor trailer was pulled in front of the doorway. In order to avoid the truck, he turned the clamp truck and hit the warehouse with the clamp.
- Employee turned valve on acetic acid drum and end of valve came out of drum.
- Employee was unloading cores from truck and while dragging skid from truck, the string holding the cores together broke causing cores to roll off pallet.

OVERALL GOAL	OVERALL PERIOD 01	2000 YEAR TO DATE	1999 TOTAL
3.0			5.2

The following are recommendations from the current safety inspection:

- Three issues at Edmund Street Warehouse that Norm will tend to:
  Outside light doesn't work.
  Roof over front door is gone and consequently water freezes on ramp.
  Foam gutter is needed on the back.

The following are recommendations from past safety inspections:

- On wet end of paper machine, the floor behind screen and elevator is in an unsafe condition. (In progress)
  Back side of second section on paper machine is missing steam valve handles. (R. Segovis locating handles)
- In the inspection winder area, concrete pillar beside baler is loosing large pieces of the concrete. (Mark evaluating) Shutdown project.
- Trial rolls in Lennox room in front of electrical breakers need to be removed. (Tim Shear checking with George Nebel.)
- Containers next to electrical room need to be checked and removed. (Tim Shear checking with George Nebel.) & Steve Lange
- In addition to ordering wooden rules for measuring rolls on paper machine, rulers will be provided for the coater. Safety rules are being updated stating the wooden rulers must be used on the paper machine and the coater. (Tim Shear checking with Steve Slate.)

Additional safety issues and concerns that were presented in addition to the current and past inspections are:

- A grate was installed on the coater due to the accident mentioned above. A concern was raised that a handle should be put on the grate so employees will have a more secure hold when lifting the grate.
- In regards to the near miss where the string broke on the cores, it has been suggested that the vendor upgrade the string holding the cores together.

The February Toolbox subjects will be selected by Beth Krowl. Ros Segovis and George Nebel will serve as the February accident investigation team. Dennis Trombley with an employee from the sign-up list will conduct the February monthly inspection.

Pizza and wings will be provided for the Year 2000 Safety Kick-Off. An exact date will be announced.

THE NEXT MEETING WILL BE HELD

THURSDAY, FEBRUARY 17, 2000

AT 1:30 PM IN THE CONFERENCE ROOM.

EVERYONE PLEASE PLAN ON ATTENDING.

SAFETY MEETING AGENDA

JANUARY 20, 2000

1. **SAFETY STATISTICS:**

   # DAYS WITHOUT LTA 393

   # DAYS SINCE OSHA RECORDABLE 23

2. **REVIEW OF ACCIDENTS:**

   ACCIDENTS X 2 put handle on crate upgrade strings on cores
   NEAR MISSES 2
   FIRE INCIDENT REPORT 0
   ACCIDENTS AT OTHER DSI SITES 13
   VEHICULAR ACCIDENT 1

3. **REVIEW INTERNAL SAFETY INSPECTION**

   PREVIEW PREVIOUS RECOMMENDATIONS

4. **OTHER SAFETY ISSUES & CONCERNS**

5. **SAFETY INCENTIVE REPORT**

FEBRUARY TOOLBOX SUBJECTS: Bell Howl

FEBRUARY INVESTIGATION TEAM: Ros Segovia
George Rebel

FEBRUARY MONTHLY INSPECTION: Dennis Trombley

FEBRUARY SAFETY INCENTIVE:

pizza & wings - kick off

JANUARY 20, 2000

	ANGUS, JOHN SR.
✓	CHASE, P.
	GILCHRIST, F.
	GILCHRIST, J.
	GREENWOOD, J.
	HARMYCH, T.
✓	HILTS, A.
✓	KROWL, B.
✓	LANGE, S.
	LAPPIES, M.
	MCWAYNE, E.
✓	NEBEL, G.
	O'HARA, M.
✓	SEGOVIS, R.
✓	SHEAR, T.
	SPENCER, T.
✓	STORRS, J.
✓	TOMLINSON, N.
	TROMBLEY, D.
	WARD, D.
	WARD, J.
✓	PORTER, C.

SAFETY INSPECTION

DATE: 1-13-00

Inspected by: J Stoms

T Narrow

WAREHOUSE:

Partial Skids of Clay Bags

CARPENTER'S SHOP:

O K

DOCK WAREHOUSE:

Fine ext. 12/99

ok

EDMUND ST. WAREHOUSE:

Outside Light Does Not Work

Roof over front door - water frozen on ramp

need rain gutter on Back

None

SAFETY INSPECTION

Cont'.

INSPECTION WINDER AREA:

Fire ext 12/99 By B/G Door

OK

ROLL STORAGE BY LAB ENTRANCE:

OK

LAB: OK

SAFETY INSPECTION

Cont'.

2ND FLOOR:

Fire ext. 2nd floor unit dusted in JAN

BEATER ROOM:

Between Pulp Dryer Pipe bent on bottom and broke on top.

MAINTENANCE SHOP:

OK

SAFETY INSPECTION

Cont'.

BOILER ROOM:

9/2

4TH FLOOR:

0/2

3RD FLOOR:

0/2

SAFETY INSPECTION

Cont'.

WET END PAPER MACHINE:

Treat on ladder to wet press missing

4TH HANDS AREA:

OK

DRY END PAPER MACHINE:

OK

SAFETY INSPECTION

Cont'.

BACK SIDE PAPER MACHINE:

OK

COATER:

OK

COATER KITCHEN AREA:

OK

The following are recommendations from past safety inspections:

done A discussion was held regarding the correct amount of space between paper rolls stored in the warehouse and the wall. Mark Lappies will check with fire inspector.

In progress On wet end of paper machine, the floor behind screen and elevator is in an unsafe condition.

done Eyewash in beater room will be replaced with a portable eyewash. Will keep drench hose.

done Eye wash near dye room low on water.

- Back side of second section on paper machine is missing steam valve handles. (R. Segovis locating handles)
- In the inspection winder area, concrete pillar beside baler is loosing large pieces of the concrete. (Mark evaluating) Shutdown project.
- Trial rolls in Lennox room in front of electrical breakers need to be removed. (Tim Shear checking with George Nebel.)
- Containers next to electrical room need to be checked and removed. (Tim Shear checking with George Nebel.)
- In addition to ordering wooden rules for measuring rolls on paper machine, rulers will be provided for the coater. Safety rules are being updated stating the wooden rulers must be used on the paper machine and the coater. (Tim Shear checking with Steve Slate.)

done A first aid kit will be provided for the office. (John Greenwood checking with Abbie.)

- Due to the large quantities of pulp arriving, more than normal is being stored in the mill. There is a concern that it's being placed in areas that is unsafe. Yellow lines will be painted on the floor designating where the pulp may be stored.

done A fire extinguisher will be placed in the area over the lab.

done A concern was voiced that some employees are driving too fast on the fork trucks. This will be a subject for the walk-around meetings in the near future. (Being done.)

- A fourth hand was observed pouring acid without the proper PPE. Phyllis will research this and post the rules and regulations concerning PPE. (Safety rules regarding PPE and wooden rulers will be posted.)

done A lock being used for lockout/tagout was not an approved lock. This procedure needs to be evaluated.

done A discussion was held on approved fire blankets when welding as a result of an incident in Rhode Island. Steve Lange will check out Brownville's fire blankets.

FIRST AID KIT
MONTHLY INSPECTION

KIT #	LOCATION	REMARKS
1	OVERHEAD DOOR BY BOILERHOUSE	OK
2	COATER	needs Big Bandaids Done (5)
3	BLACKSMITH SHOP	OK
4	MAINTENANCE SHOP	OK
5	FOREMAN'S OFFICE	OK
6	MACHINE WINDER (FRONT DOOR)	OK
7	50 % LAB	OK Restocked
8	2nd FLOOR BY STAIRS	OK
9	3rd FLOOR BY STAIRS	OK
10	SHIPPING WAREHOUSE	OK
11	CARPENTER SHOP	needs Big Bandaids Done (5) OK
12	HEATED WAREHOUSE (LENNOX RM.)	OK
13	MAIN OFFICE	OK - new

INSPECTED BY: Jim Stone DATE: 1-13-99

REXAM

Coated Films and Paper Sector

Safety Flash

XX Check If Initial Report ☐ **Check If Update Report**

An incident occurred within the Coated Films and Paper Sector that you need to know about. Below are details that you can review and apply to your specific operations. Please review.

Location of Facility: REXAM DSI - Brownville, New York
Date and Time of Incident: 12/27/99 11:00 AM
Contact for More Information: Norm Tomlinson
Telephone Number: (315) 782-5800 Ext. 18

What Happened?

Employee sustained a 2 inch superficial laceration to the upper right thigh while cutting up plastic tote bin liners for disposal. The injured employee was using a 3.5" Makita circular saw. The employee was bending at the waist and operating the saw at ground level. When he straightened up, the saw blade contacted his right thigh. The wound required 15 staples for closure. The employee returned to work with no lost time or restrictions.

Initial Findings:

- Tote bins are used for storage of left-over coatings.
- When the bins become too encrusted with coating scale for reuse, they are disposed of.
- Before disposal, the bins have been disassembled to reclaim recyclable materials, reduce bulk (cost) of solid waste, and to assure that no free liquid remained in the liner (prohibited by landfill).
- The employee was wearing safety glasses, gloves and hearing protection when the accident occurred.
- The guard on the saw did not function properly due to melted plastic in the guard housing.
- The employee was familiar with the operation and hazards of the circular saw.
- This was the first time that the injured employee had performed this task.
- There were no witnesses to the accident.

Probable Causes:

Root Cause: Handling of left-over coatings.

Contributing Factors:

- Carelessness – Employee was not paying close enough attention to the hazard.
- Saw guard did not function properly due to melted plastic in housing.

Corrective Actions/Actions to Prevent Reoccurrence:

- Reduction of left-over coatings is one of several issues being addressed by a Green Belt project (Coating Kitchen Optimization) led by George Nebel.
- Coatings with a low likelihood of reuse will no longer be saved.
- Tote bins will no longer be disassembled prior to disposal. The Brownville mill has gained the approval of the waste handler to dispose of the totes as is in an open top dumpster providing there is no free liquid in the bin. Appropriate storage, handling and inspection procedures have been implemented.
- A power tool training program will be developed by the Brownville Maintenance Department for all employees. This program will become a mandatory element of the mill's new employee training program.
- This incident and the resulting SOP changes will be reviewed with all scheduled employees within the next 24 hours (all others by 1/4/00).

INCIDENT INVESTIGATION REPORT

This form must be completed in it's **entirety**. **Do not** write in the shaded areas. A First Report of Injury must company this Incident Investigation report.

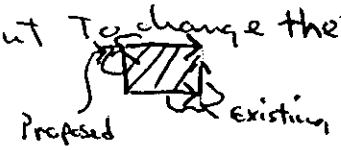
Brownville

1. Employee Involved: MARIO LENTINE
2. Date of Incident: 1-10-2000
3. Time of Incident: 12:20 PM
4. Date Reported: 1-10-2000
5. Was report to Supervisor or First Aid Delayed? [ ] Yes [X] No — If yes, why:
6. Employees Regular Occupation: COATER HELPER 2ND STA.
7. Regular Occupation at Time of Incident? [X] Yes [ ] No [ ] Other
8. Shift Worked? 7-3
9. Shift Starting Time: 7:00 A.M.
10. Number of Hours Employee Worked Before Injury: 5 HRS. 20 MIN.
11. Specific Task Being Performed: OPERATING 2ND STA.
12. Employee Medical Status: [X] First Aid [ ] Sent to O.H. & .R. [ ] Sent to Hospital
13. Did Anyone come in contact with blood or Bodily Fluids? [ ] Yes [X] No
14. If Yes, Employee Name:
15. Description of Incident: EMPLOYEE WAS WORKING AROUND 2ND STA., FILLING ROD HOLDER IN WITH COATING TO PREVENT LINES, WHEN EMPLOYEE WENT TO BACKSIDE HE STEPPED IN A HOLE APPROX 15" IN DIA. THAT IS THERE TO ALLOW FOR THE JOURNAL ON 1ST STA. BACKING ROLL TO PASS THRU WHEN BEING CHANGED
16. Nature/Extent of Injuries or Property Damage: EMPLOYER SCRAPED HIS RIGHT SHIN + SCRAPED + BRUISED THE BACK OF HIS LEFT LEG
17. Team Leader Signature: Timothy W. Dupee
18. Employee Signature: Mario Lentine
19. Date: 1-10-00

REVIEW BY TEAM LEADER

20. Check One of the Following: [X] Unsafe Act [x] Unsafe Condition [ ] Equipment Failure [ ] Poor Housekeeping
21. Was the employee taking medication when the accident occurred? NO
22. Is there a possibility that the accident occurred on the employees time? NO
23. Was there a Witness? [X] Yes [ ] No
24. If Yes, The Witness Name(s): CRAIG BOETTNER
25. Was a Statement Obtained from the Witness? [ ] Yes [X] No
26. Investigation Revealed: Employee Tripped on Tow Board and stumbled when he put his Left Foot down, it was in back of tow Board and he fell through the open area.
27. Corrective Action Taken or Recommended: The Open Area behind Tow Board Was Filled in with a removeable grate.

If possible we may want To change the tow Board to run closer to the station



28. Type of Injury: [ ] Recordable [ ] Recordable with Lost Time [X] First Aid [ ] Close Call - No Injury

INCIDENT INVESTIGATION REPORT

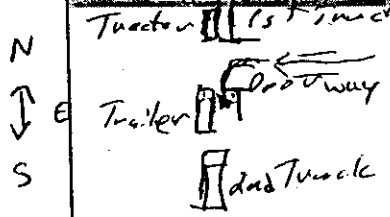
This form must be completed in it's **entirety**. **Do not** write in the shaded areas. A First Report of Injury must accompany this Incident Investigation report.

Brownville

1. Employee Involved: John Lafavett
2. Date of Incident: 1-3-2000
3. Time of Incident: 7:00 P.M.
4. Date Reported: 1-3-2000
5. Was report to Supervisor or First Aid Delayed? [ ] Yes [X] No
   If yes, why: none
6. Employees Regular Occupation: 3rd shift
7. Regular Occupation at Time of Incident? [X] Yes [ ] No [ ] Other
8. Shift Worked? 3-11
9. Shift Starting Time: 3:00 P.M.
10. Number of Hours Employee Worked Before Injury: 4 hrs.
11. Specific Task Being Performed: getting ready to unload with clamp truck
12. Employee Medical Status: [ ] First Aid [ ] Sent to O.H. & R. [ ] Sent to Hospital
13. Did Anyone come in contact with blood or Bodily Fluids? [ ] Yes [X] No
14. If Yes, Employee Name: none
15. Description of Incident:
    John was coming out of warehouse with cover laying in the clamp on clamp truck when he noticed tractor trailer in front of door way. He swung the clamp truck around to avoid hitting trailer, + hit the building with the clamp.
16. Nature/Extent of Injuries or Property Damage:
    Put hole in side of building -
17. Team Leader Signature: Fred Kilchrist
18. Employee Signature: [signature]
19. Date: 1-3-2000

REVIEW BY TEAM LEADER

20. Check One of the Following: [X] Unsafe Act [x] Unsafe Condition [ ] Equipment Failure [ ] Poor Housekeeping
21. Was the employee taking medication when the accident occurred? no
22. Is there a possibility that the accident occurred on the employees time? no
23. Was There a Witness? [ ] Yes [X] No
24. If Yes, the Witness Name(s): NONE
25. Was a Statement Obtained From the Witness? [ ] Yes [X] No
26. Investigation Revealed:



1st Truck was parked accross the Door Way it was Blocking Door way. John was going to go between Building and Truck when another Truck Pulled in behind the 1st Truck. He applied brakes and clamp turned into the building.

27. Corrective Action Taken or Recommended:
    Stop Trucks from Parking accross Door Way

28. Type of Injury:
[ ] Recordable [ ] Recordable with Lost Time [ ] First Aid [X] Close Call - No Injury

Near Miss

INCIDENT INVESTIGATION REPORT

This form must be completed in it's **entirety**. **Do not** write in the shaded areas. A First Report of Injury must accompany this Incident Investigation report. Near Miss **Brownville**

1. Employee Involved: B. Lynch
2. Date of Incident: 1-13-00
3. Time of Incident: 5 30 A.M.
4. Date Reported: 1-13-00
5. Was report to Supervisor or First Aid Delayed? [ ] Yes [X] No — If yes, why:
6. Employees Regular Occupation: 4th hand
7. Regular Occupation at Time of Incident? [X] Yes [ ] No [ ] Other
8. Shift Worked? 11-7
9. Shift Starting Time: 11 00 P.M.
10. Number of Hours Employee Worked Before Injury: 6 1/2 hrs.
11. Specific Task Being Performed: getting acid out of drum
12. Employee Medical Status: [ ] First Aid [ ] Sent to O.H. & .R. [ ] Sent to Hospital
13. Did Anyone come in contact with blood or Bodily Fluids? [ ] Yes [X] No
14. If Yes, Employee Name:
15. Description of Incident: Acetic

Brian went to get acid out of drum, he turn valve on drum and it came out of drum in his hand.

16. Nature/Extent of Injuries or Property Damage: NONE — He was wearing all his P.P.E.
17. Team Leader Signature: Fred Hilchrist
18. Employee Signature:
19. Date: 1-13-00

REVIEW BY TEAM LEADER

20. Check One of the Following: [ ] Unsafe Act [x] Unsafe Condition [ ] Equipment Failure [ ] Poor Housekeeping
21. Was the employee taking medication when the accident occurred?
22. Is there a possibility that the accident occurred on the employees time?
23. Was There a Witness? [ ] Yes [ ] No
24. If Yes, The Witness Name(s):
25. Was a Statement Obtained From the Witness? [ ] Yes [ ] No
26. Investigation Revealed:

There was a lot of Tape on Threads. The threads were good. Valve was Not screwed in all the way

27. Corrective Action Taken or Recommended:

Put up Notice to 4th Hands what Happened and how to prevent by Just putting one Layer of P.T. Tape on threads and make sure Valve is screwed in all the way. If any question about how secure it is ask Supervisor for New Valve.

28. Type of Injury:
[ ] Recordable [ ] Recordable with Lost Time [ ] First Aid [ ] Close Call - No Injury

Near Miss

INCIDENT INVESTIGATION REPORT

This form must be completed in it's **entirety. Do not** write in the shaded areas. A First Report of Injury must accompany this Incident Investigation report.

Brownville

1. Employee Involved: Tyler Thuriga l
2. Date of Incident: 1/14/00
3. Time of Incident: 1130 AM
4. Date Reported:
5. Was report to Supervisor or First Aid Delayed? [ ] Yes [ ] No — If yes, why:
6. Employees Regular Occupation: Yard
7. Regular Occupation at Time of Incident? [X] Yes [ ] No [ ] Other
8. Shift Worked? 7 to 330
9. Shift Starting Time: 700
10. Number of Hours Employee Worked Before Injury: 4½ Hrs
11. Specific Task Being Performed: moving coves
12. Employee Medical Status: [ ] First Aid [ ] Sent to O.H. & .R. [ ] Sent to Hospital
13. Did Anyone come in contact with blood or Bodily Fluids? [ ] Yes [X] No
14. If Yes, Employee Name:
15. Description of Incident: Tyler was unloading cores from Truck dragging skid from truck to ware House. when the strings that Hold boxes together Broke
16. Nature/Extent of Injuries or Property Damage: None cores got Dirty
17. Team Leader Signature:
18. Employee Signature: Tyler Thuriga l
19. Date:

REVIEW BY TEAM LEADER

20. Check One of the Following: [ ] Unsafe Act [x] Unsafe Condition [ ] Equipment Failure [ ] Poor Housekeeping
21. Was the employee taking medication when the accident occurred?
22. Is there a possibility that the accident occurred on the employees time?
23. Was there a Witness? [X] Yes [ ] No
24. If Yes, the Witness Name(s): / Arron Ryor
25. Was a Statement Obtained from the Witness? [ ] Yes [X] No
26. Investigation Revealed: The strings that Hold cores together Broke
27. Corrective Action Taken or Recommended: Have Supplier use Higher Tensile strength string and better skids
New Ramp so you dont need to drag skid down Road
28. Type of Injury: [ ] Recordable [ ] Recordable with Lost Time [ ] First Aid [X] Close Call - No Injury

APPENDIX 41

1997 Internal Safety Inspection

Hamilton Initiative Evaluation Process - Facility Managers/Contact List

Custom -

Bristol - Ian Curtis
Lancaster - Larry Snyder
Matthews - Frank Norwood
Runcorn - Mike Meades
Spartanburg - Gary Ficker
Wrexham - Bill Broughton

DSI -

Brownville - Keith Strohschein
Johnston - Bob Murphy
Reading - Joe Benish
West Springfield - John Mumper

Graphics -

Chartham - Mike Yates
Portland -Tom Bickford
South Hadley - John McCue

Release -

Apeldoorn - Willem Holtkamp
Bedford Park - Wayne Hagaki
Eden - Rick Puhalla
Iowa City - Mark Hutchinson
West Chicago - Joe Sibrava

Phyllis, Steve, Art/Fred
(I may need some help to fill it out.
FYI
Keith

Part of the 2121 Visit

Steve

from B.V. book

REXAM **Internal Memo**

Date: January 10, 1997

To: Coated Films and Papers Sector Facility Managers

cc: Facility Manager Distribution List - Attached
Harry Barto
Frank Brown
Bob Champigny
Bob Hamilton
Anthony McLaurin
John McCue
Wayne Moore

From: Mike Gorski
Gordon Miller
Ron Miller
Bob Murphy
Chuck Quinby

Subject: Health and Safety Evaluations
gm96297a.sam

At the December 12th and 13th Sector Management Team Meeting, the Health, Safety & Environment Leverage Group was tasked with conducting evaluations of potential safety and health risk at all Coated Films and Papers facilities. The Sector Management Team agreed that evaluations need to be completed by the end of 1st Quarter, 1997. The goal of the evaluation is to assess where possible significant safety and health risks are present in each facility. Correction of possible risk issues found during the evaluation is, according to the agreed actions of the Sector Management Team, by the end of 2nd Quarter, 1997. As you can image, this is a significant task to be undertaken by the Leverage Team as well as each of your facilities. Your support is needed in this process. It should be recognized that this is a snap-shot evaluation that may not find each risk that is present at the facility nor indicate compliance with all applicable laws and regulations.

The Leverage Team, with some limited external support from our risk management consultant and under the direction of the Legal Department, will be conducting these evaluations at your facility sometime during the 1st Quarter. Outlined below is the anticipated process.

1. We will get out a schedule of anticipated evaluation dates that will include your facility. Attached is a tentative schedule for the evaluations. Please plan to have yourself and key safety, human resource and engineering staff available on the date of your evaluation to answer questions and help with evaluation process. We will also need help with arrangements such as accommodations and similar logistics.

2. You will receive a letter and an information request from the Legal Department or outside counsel about three weeks prior to the evaluation visit. The information request must be completed and returned seven (7) days prior to the evaluation. Much of the information requested will be standard information about the facility potentially available from submittals to governmental agencie or to support internal requirements. If you have questions about the information request or any

specific data request, please contact Gordon Miller at (704) 847-9171 or by E-Mail.

3. On the date of the evaluation, a small team of evaluators from the Leverage Group will visit your facility. Depending upon the size of the facility, the team will have one day to complete the evaluation. It should be a full day of activity. As now envisioned, the process will include:

a. A brief opening meeting to meet facility staff and review the agenda for the evaluation.

b. Complete a facility tour to provide foundation for the evaluation.

c. Review, with the facility team, the data supplied on the information request. Our purpose is to understand the facility processes, the risks associated with those processes, the level of risk present at the facility, and corrective actions that may need to be undertaken to minimize risk to acceptable levels. This process may involve conference room discussions and further review/touring of the facility along with some technical/management review.

d. At the end of the evaluation, the Leverage Team members will meet with you and briefly describe what was found. From that meeting, the facility should create plans for corrective action.

e. After the evaluation, routine follow-up on recommended improvement actions/updating of information about a particular identified risk identified will be required of the facility.

Summary data from all of the evaluations undertaken will be submitted to the Sector Management Team through John McCue. John is the Sector Management Team liaison for the Health, Safety & Environment Leverage Team.

If you have any questions about the evaluation process, please contact Gordon Miller at (704) 847-9171 or through the E-Mail. While the timeframe presented by the Sector Management Team is short, we can manage this process to identify potential risks and support risk minimization for all in the Coated Films and Papers Sector.

GCM/

Attachment - Questionnaire, Tentative Schedule, and Related Information

COATED FILMS AND PAPERS SECTOR
FACILITY REVIEW FORM

(This form is to be completed by the facility. As much as is possible, the data should be summarized onto this form and not added as attachments unless otherwise requested.)

Facility Name: REXAM - DSI
Facility Location: BROWNVILLE NY

Size of Facility (Number of Buildings, Age and Square Footage of Each):

Number of Employees: Salaried, Exempt: 8
Non-Exempt: 63
Temporary/Part-Time: 2

Description of Major Facility Processes (mixing, coating, slitting, converting, finishing, labs, papermaking, etc.): PULPING - SLURY MARKET GRADE PULPS; WATER TREATMENT - FILTER PROCESS WATER; PAPERMAKING - MIX SATURANT AND MAKE PAPER; REWIND; COAT PAPER; COATING MIX OPERATIONS; BOILER OPERATIONS; MAINTENANCE; PAPER LAB; OFFICE ADMINISTRATION

Major Equipment Present at Facility: (include pollution control systems, bulk storage, boilers, etc.) 2 - 2000 # HYDRAPULPERS, REFINERS, 1 PAPER MACHINE - FOURDRINIER, PM CALENDER 1 - PM WINDER, 1 - 3 STATION OFF LINE COATER, 1 - FINISHING SLITTER/WINDER 1 - COATING KITCHEN, RM STORAGE TANKS FOR LATEX, LAB, SATURANT MIX 2 - BOILERS (1 GAS, 1 FUEL OIL) WATER: 30,000 GPD RIVER H_2O FILTERED, EFFLUE TO CI MUNICIPAL

Is the Facility Workforce Organized? NO By Whom?

Identify and write in below with some detail what you believe to be the ten (10) largest safety and health risks present at this facility that could dramatically reduce or destroy production capability, cause significant injuries and/or death to employees and the public, and/or remove credibility for the facility and its operations.

Examples: The fire and injury that recently occured at Bristol with solvent handling

The fire/explosion in the oven at Apeldoorn from vapors

The injury, due to crushing between equipment that occurred during start of new equipment at Spartanburg

Look particularly for old/new equipment, chemical handling and volumes, recently modified equipment, and/or very inexperienced workforce elements or/and "very" experienced workforce elements.

1. SEE ATTACHED
2.
3.
4.
5.

PRIORITY	AREA	POTENTIAL / RISK
1	Emergency Response	Lack of Trained First Responders
2	Chemical Handling	Caustic at pulpers Acid Handling Ammonia Handling
3	Dust Hazard	OSHA Requirements for silica / dust Coater Kitchen DE Filter
4	Machinery Operation	Freight Elevator interlocks
5	Guarding	Reel drum marking Winder guarding
6	Community Issues	Crossing flasher for lift truck traffic crossing main road
7	Fire / Explosion	Marsden Heaters
8	Environmental	Water Permit Temp exceeds permit (limited incidents) BOD exceeds limits (limited Incidents)

6.

7.

8.

9.

10.

Describe Chemical or Other Hazardous Material Use:

List the Top Ten Chemicals Used in 1996:

Chemical Name	Estimated Quantity Used in 1996
LATEX 2679X6	5,423,000 POUNDS WET
LATEX 2671	1,183,000 POUNDS WET
ULTRA WHITE 90 CLAY	1,064,000 POUNDS DRY
ULTRA GLOSS 90 CLAY	990,000 POUNDS DRY
LATEX 100 HS	695,000 POUNDS WET
LATEX 26138	566,000 POUNDS WET
SIZE EMULSION 8162	412,000 POUNDS WET
CALCIUM CARBONATE	319,000 POUNDS WET
LATEX 2679	313,000 POUNDS WET
BLACK PIGMENT - PERMAOLK 215	292,000 POUNDS WET

Describe Storage and Location of These Chemicals at Facility or Elsewhere:

Years	# of Fires	# of Chemical Spills over One Drum	Total Accident Incident Rate*
1994	5	UNK/0	2.7
1995	7	UNK/0	6.5

Years	# of Fires	# of Chemical Spills over One Drum	Total Accident Incident Rate*
1996	8	1	8.0

* Incident rate is the:

(Number of Recordable Incidents x 200,000)/Total Employee Hours Worked During Year = Incident Rate

Briefly Describe Reported Other Insurance Claims (not accidents, fires, or spills) for Facility during the Past Three Years: _____

What Percentage of Work Activity is Handled Using Contractors? (include janitorial, maintenance, etc.) 3-5%, JANITORIAL - OFFICE; SPECIALIZED MAINTENANCE AS NEEDED

Do you have Regularly Scheduled Shut-Downs? YES When and How Often and for How Long? 2-WEEK ANNUAL JULY OR AUGUST

Completed by: KEITH STROHSCHEIN Date: 2/13/97

Organization: REXAM DSI - BROWNVILLE Telephone: 315-782-5800

(Please provide as an attachment a map that will describe how to get from the nearest large airport to the facility.)

gm97009a.mem

REXAM DSI BROWNVILLE N.Y.
HEALTH AND SAFETY EVALUATION FEBRUARY 19, 1997

Prepared from 2/19/97 tour (chse97.lwp\C:ml)
Minor Infraction List

- ✓ Through out the plant objects were placed in front of electrical distribution panels.
- ✓ Over head obstruction located on the back of the fourth section dryer frame.
- ✓ Labels must be removed from all drums that are not containing the original chemical or material for which it was intended. Example: All waste barrels must have labels removed.
- ✓ Identify all natural gas piping through out the mill.
- ✓ Plug and cord connection on the light located at the front of dryer section #3 is loose.
- Label all load ratings of overhead hoist's and beams through out the plant.
- ✓ Repipe valve to the fire hose over the stair well at the wet end to make it accessible without reaching over the stairs.
- ✓ Install cover on the back of the 760's located at the back of the wet end cabinet.
- ✓ Label all warning lights and sirens.
- ✓ Label all chemical containers in the mill, (labels must be consistently uniform).
- ✓ Review fire control measures in the maintenance shop, (Welding was being performed in close proximity to a pipe threading machine containing oil.)
- ✓ Reduce the amount of aerosol can storage at one location in the shop.
- ✓ A barrel of corrosive was discovered in a flammable cabinet.
- ✓ Determine need of re installing a fire door at the maintenance shop entrance.
- ✓ Service portable eye wash stations more frequently.
- ✓ Affix right to know labeling on chemical storage containers in the boiler house.
- Complete railing around the pressure screen.
- Add 4" toe board around the pressure screen railings.
- Label all electrical panels and circuit breaker panels through out the mill.
- ✓ Install cover on the 4" junction box in the Lennox room.
- ✓ Install 3/4" plug into the high pressure water line to the gas boiler.
- ✓ Label DE filter.
- ✓ Toe board missing from the cat walk around the second oven on the coater.
- ✓ Articles laying on the duct work to the ovens on the coater. (Rags, knives, scrub pads etc..)
- ✓ Mark loading of all overhead storage areas.
- ✓ Material stacked to close to sprinkler heads in the warehouse.
- ✓ Remove baled scrap from warehouse and limit quantities stored in the facility.
- ✓ Install blade guard on the core cutter.
- ✓ Replace, remove or update the planer and the radial arm saw in the carpenters shop.

REXAM DSI BROWNVILLE N.Y.
HEALTH AND SAFETY EVALUATION FEBRUARY 19, 1997

Major health and safety issues of the evaluation:

✓ 1. Egress and exit marking through out the plant.
- Marking none exits
- Marking exit routes through out the plant to comply with O.S.H.A. standards.
- Labeling phones with emergency numbers.
- Posted fire escape routes.

✓ 2. Security
- Restrict access into the building
- Better control of non employee access.

✓ 3. Improve general guarding through out the mill.

4. Spill, splash, leak, and fire protection for the #6 fuel oil feed.
- Leak detection on the pump side of the fuel oil heaters fuseable plugs
- ✓ Leak detection on the tank side of the fuel oil heaters.
- ✓ Remote fire detection at the fuel oil tank, heaters, and pumps.

5. Elevator does not meet current requirements

✓ 6. Confined space
- Ability to attempt an effective rescue
- Emergency response planning
- Verification of outside contractors to attempt an effective rescue

7. Lift truck traffic on the roadway
- The need for traffic warning devices

✓ 8. Ground fault protection in all wet areas of the mill

✓ 9. Consistency of the chemical labeling in the mill

APPENDIX 42

Loss Control Surveys

Rexam DSI

Rexam DSI
Bridge St.
Brownville NY
13615

Phone: (315)782-5800
Fax: (315)788-0529
E-mail: MARK.LAPPIES@REXAM.COM

Friday, December 18, 1998

Bill Hughes
cc:
Robert Murphy
John Mumper
Clint Tumlin
Mike Thrower

Re: Royal and Sunalliance
Loss prevention program

This letter is written in response to the Loss Control Visit conducted by Royal and Sunalliance at the Brownville Mill in the fourth quarter of 1998.

Item No. 98-1

Recommended- Remove exposed foam insulation located in the boiler house and color room, or cover with listed fire rated thermal barrier.

Response and proposed action- To remove the foam insulation and re-insulate would not be cost effective. To remove the insulation and not re-insulate would not be prudent given the severity of northern N.Y. winters. Therefore we have decided to cover the foam insulation with an approved fire and thermal rated material. The covering will be steel siding panels, these panels are scheduled to be installed in January of 1999.

Item No. 98-2

Recommended- Provide 24-inch aisle clearance between roll paper storage and walls in the warehouse roll paper storage area.

Response and proposed action- All warehouse personnel and yard crew have been notified of this action. Signs stating that a minimum of 24" must be maintained between walls and rolls have been ordered and will be posted on warehouse walls. It should be noted that our product is 100% latex saturated and is not prone to water absorption the way most paper rolls are.

Item No. 98-3

Recommended- Wooden pallet storage should be outside of the mill approximately 50 feet from any building, or if stored inside, storage heights should not exceed 6 feet and storage should be away from other combustibles.

Response and proposed action- Due to storage room constraints at the Brownville mill storage of pallets outside 50 feet from the building is not an option. However limiting storage height and proximity to other combustibles is an option. Every effort will be made to limit the over stacking of pallets and placing them near any other combustible materials.

Item No. 98-4

Recommended- Extend automatic sprinkler protection to include the machine shop on the north side of the boiler house.

Response and proposed action- This problem was identified in house prior to our loss prevention inspection. This item is completed.

Item No. 98-5

Recommended- Extend sprinkler protection below ducting of fresh air make-up unit.

Response and proposed action- The sprinkler protection has been repiped to provide coverage in this area. This item is completed.

Item No. 98-6

Recommended- Consideration should be given to replacing the existing 3/4" sprinkler branch lines with 1" pipe.

Response and proposed action- This recommendation has been brought up on previous loss control inspections. It is our policy in the mill to replace 3/4" sprinkler lines with 1" lines whenever work is performed on the system or related work is completed in the area. This will continue to be an ongoing practice until the entire system is completed. It is comforting to know that of the considerable lines that have been replaced to date, the lines that were removed have been in good working order without obstructions.

Mark Lappies
Plnt. Eng.

AON

Aon Risk Services

Memorandum

To: Mark Lappies - Rexam DSI - Brownville

CC: C. Tumlin - Rexam - Charlotte

K. Worth - Rexam DSI - S. Hadley

R. Murphy - DSI - Johnson

From: Mike Thrower - Aon - Charlotte

Date: December 14, 1998

Re: Property Loss Control Report Dated September 8, 1998

Attached please find a copy of the property loss control report as a result of Mr. Clark's visit on September 8. 1998. This report was received in my office on 12/14/98. The report outlines several recommendations for your review and consideration. Each of which should have been reviewed with you prior to Mr. Clark's departure. My comments on these are as follows:

1. Rec. 98-1: Is this a urethane foam? Have you looked at removing or covering this previously?
2. Rec. 98-2: This is a good idea.
3. Rec. 98-3: Can you keep the pallet heights at 6' or less?
4. Rec. 98-4: I would not think a machine shop would have a significant combustibles loading. Is the area heated? I would appreciate your comments.
5. Rec. 98-5: How wide is the ductwork? And what is located beneath it?
6. Rec. 98-6: This is a good idea and could be worked into any repair or upgrade that goes into areas where these ¾" lines exist.

I would appreciate receiving your response to these recommendations by January 20th.

Aon Risk Services, Inc. of the Carolinas
2400 Interstate Tower • 121 West Trade Street, Suite 2400 • Charlotte, North Carolina 28202
tel: (704) 343-4100 • tel: (704) 333-7543 • fax: (704) 343-0826

ROYAL & SUNALLIANCE
GLOBAL

North American Operations
Wall Street Plaza
88 Pine Street
New York, NY 10005

Telephone 212 510-1100
Facsimile 212 510-1111

December 8, 1998

Rexam Corporation
Decorative Specialties International, Inc.
Bridge Street
Brownville, NY 13615

Attention: Mr. Mark Lappies, Plant Engineering

Re: Loss Control Visit

Dear Mr. Lappies:

Thank you for your time in effort and coordinating my recent visit your facility. The purpose of the visit was to conduct a loss control re-survey. The report and associated recommendations are being coordinated through your Charlotte, North Carolina office and should follow soon.

If you have any questions, please give me a call.

Sincerely,

Rick Clark
Syracuse Loss Control

cc: Mike Thrower, AON – NC
Leonard Turner, C.E. Heath
Graham Medcalf, RSA – UK
Karen Franklin, RSA – NY

• Royal Insurance Company of America
• Royal Indemnity Company
• Globe Indemnity Company
• Safeguard Insurance Company
• American and Foreign Insurance Company
• Sun Insurance Office of America Inc.

ROYAL & SUNALLIANCE
GLOBAL

North American Operations
Wall Street Plaza
88 Pine Street
New York, NY 10005

Telephone 212 510-1100
Facsimile 212 510-1111

December 8, 1998

Rexam Corporation
Decorative Specialties International, Inc.
Bridge Street
Brownville, NY 13615

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Re: Loss Control Visit

Dear Mr. Lappies:

Thank you for your time in effort and coordinating my recent visit your facility. The purpose of the visit was to conduct a loss control re-survey. The report and associated recommendations are being coordinated through your Charlotte, North Carolina office and should follow soon.

If you have any questions, please give me a call.

Sincerely,

Rick Clark
Syracuse Loss Control

cc: Mike Thrower, AON – NC
Leonard Turner, C.E. Heath
[redacted]
Karen Franklin, RSA – NY

• Royal Insurance Company of America
• Royal Indemnity Company
• Globe Indemnity Company
• Safeguard Insurance Company
• American and Foreign Insurance Company
• Sun Insurance Office of America Inc.

ROYAL & SUNALLIANCE
GLOBAL

North American Operations
Wall Street Plaza
88 Pine Street
New York, NY 10005

Telephone 212 510-1100
Facsimile 212 510-1111

December 8, 1998

Rexam Corporation
100 N. Tryon Street, Suite 5200
P.O. Box 35626
Charlotte, NC 28247

Attention: Mr. C. Tumlin, Manager – Finical Services

Re: Loss Control Visit

Dear Mr. Tumlin:

Enclosed please find the loss control report and associated recommendations for the Brownsville, NY site. The purpose of the visit was is to conduct a property loss control survey.

Can you please review the recommendations and let us know Rexam's response within the next 60 days. Should you have the questions, please do not hesitate to give us call.

Sincerely,

/c/Rick Clark

Rick Clark
Syracuse Loss Control

cc: Mike Thrower, AON – NC
Leonard Turner, C.E. Heath - UK
[redacted]
Karen Franklin, RSA – NY

• Royal Insurance Company of America
• Royal Indemnity Company
• Globe Indemnity Company
• Safeguard Insurance Company
• American and Foreign Insurance Company
• Sun Insurance Office of America Inc.

CONFIDENTIAL
This report should only be made available to persons authorized by Royal & SunAlliance

ESTIMATED MAXIMUM LOSS

Producing Office: London
Underwriter: G. Medcalf

Co-ord Case No: 431888.064

Insured:	**Rexam, Inc.**
Location:	**"Decorative Specialities International, Inc."**
	Bridge Street
	Brownville, NY 13615
	USA
Occupation:	**Paper Manufacturing**
Reason for Visit:	**Property Loss Control Re-survey**
Date of Visit:	**September 8, 1998**
Person Seen:	**Mr. Mark Lappies, Plant Engineering**
Prepared By:	**R. J. Clark**
	Senior Technical Property Specialist
	Syracuse Loss Control Department
	(315) 426-4018

The purpose of this report and loss prevention program is to provide underwriting information and to assist the Proposer or Insured in its management of risks. The recommendations are based on conditions observed and information made available at the time of the inspection and do not imply compliance with statutory or local regulatory requirements or that there are no other risks or hazards. Implementation of the loss control measures is the responsibility of the Proposer or Insured.

The liability of Royal & SunAlliance Insurance is limited to the insurance provided under any policies issued in respect of the property or risk concerned.

Date: 09/18/98	Premises Sum Insured (PSI)			EML Non-Sprinklered				EML Sprinklered			
Unit: $ (000)	Basis of Values [1]	Amount [2]	Target Block %	As % of Target Block	Amount [3]	As % of PSI	R [4] (Mths)	As % of Target Block	Amount [3]	As % of PSI	R [4] (Mths)
Buildings	O	2,070,439	100	100	2,070,439	100	12	100	2,070,439	100	12
M & P	O	12,423,861	100	100	12,423,861	100	12	100	12,423,861	100	12
Stock	O	793,000	100	100	793,000	100		100	793,000	100	
Other item											
Other item											
PD Total [5]		15,287,300			15,287,300				15,287,300		
Est. Gross Profit		14,600,000			14,600,000				14,600,000		
Other Group Co. GP											
MIP (mths)	12										
BI Total [5]		14,600,000			14,600,000				14,600,000		
PD + BI Total [5]		29,887,300			29,887,300				29,887,300		

BI Calculation		Recovery Period				Loss for Target Block		Generic Growth		
		B/- (Mths)	M/P (Mths)	+Mrkt. (Mths)	Total (Mths)	Before Adjustment (as % of MIP)	After Adj.	Per annum %		
EML Non-Sprinklered		12	12		12	100				
EML Sprinklered		12	12		12	100				

EML (Estimated Maximum Loss) Non-Sprinklered
An estimation of the maximum loss which could reasonably be sustained from the contingencies under consideration, as a result of a single incident considered to be within the realms of probability taking into account all factors likely to increase or lessen the extent of the loss, but excluding such coincidences and catastrophes which may be possible but remain unlikely. If the location is sprinkler protected, it is assumed the protection will not operate. Automatic fire detection systems are considered subject to effective response and maintenance.

EML (Estimated Maximum Loss) Sprinklered
An estimation of the maximum loss which could reasonably be sustained from the contingencies under consideration, as a result of a single incident considered to be within the realms of probability taking into account all factors likely to increase or lessen the extent of the loss, but excluding such coincidences and catastrophes which may be possible but remain unlikely. If the location is sprinkler protected and the consultant is fully confident that the system will operate effectively, the EML is based on the assumption that it will be in working order, will operate and control the fire.

1. 'R' Reinstatement. 'I' Indemnity. 'O' Other. 2. Excluding inflation. Estimates are given for Group floaters. 3. Inflation (PD) and growth (BI) not included.
4. Estimated reinstatement period. 5. Based on the major schedule items.

Note: Attention is drawn to the disclaimer on the front page of this report.

R.J. Clark

Senior Property Technical Specialist

Syracuse Loss Control

315-426-4018

Date: December 7, 1998

(END)

CONFIDENTIAL
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PROPERTY REPORT

Producing Office: London
Underwriter: G. Medcalf

Co-ord. Case No: 431888.064

Insured:	**Rexam, Inc.**
Location:	**"Decorative Specialties International, Inc."**
	Bridge Street
	Brownville, NY 13615
	USA
Occupation:	**Paper Manufacturing**
Reason for Visit:	**Property Loss Control Re-survey**
Date of Visit:	**September 8, 1998**
Person Seen:	**Mr. Mark Lappies, Plant Engineering**
Prepared By:	**R. J. Clark**
	Senior Technical Property Specialist
	Syracuse Loss Control Department
	(315) 426-4018

The purpose of this report and loss prevention program is to provide underwriting information and to assist the Proposer or Insured in its management of risks. The recommendations are based on conditions observed and information made available at the time of the inspection and do not imply compliance with statutory or local regulatory requirements or that there are no other risks or hazards. Implementation of the loss control measures is the responsibility of the Proposer or Insured.

The liability of Royal & SunAlliance Insurance is limited to the insurance provided under any policies issued in respect of the property or risk concerned.

RISK SUMMARY

Extent of Survey

This site was visited to conduct a property loss control re-survey.

Occupancy

The main plant is a one and 2 story structure with one, two, and three sub-levels below the first floor. Building is 49% ordinary construction (ISO class 2), 46% fire resistive (ISO class 6), and 5% non-combustible (ISO class 4). Ground floor area is approximately 65,000 ft^2 with a total square footage of approximately 102,000 ft^2. The main plant is protected by wet pipe sprinklers covering approximately 80% of the entire building. Automatic sprinkler protection covers nearly 100% of the 1st floor and 2nd floor office areas. The only unsprinklered areas on the 1st and 2nd floor is the boiler house. Across Bridge St. to the east of the main plant is a 16,000 ft^2 one story warehouse of ordinary construction (ISO class 2) protected by a dry pipe sprinkler system covering 100% of the total area.

Principal Changes

No changes in operation have occurred since the previous visit.

The paper-coating machine has been rebuilt. A new freight elevator was installed to allow for easier access to floor levels below grade and a small (est. 12'X 20") air compressor room is now located on the south side of the plant.

Future Developments

No future plans were discussed.

Incident Experience

Management did not present any past loss history.

Class Number

513

Opinion of Risk

Overall improvements are needed in the removal of combustible insulation and storage configurations to improve the risk quality to an acceptable level. Management programs are in place and adequate for the operation.

Recommended Re-survey Date

The next survey should be conducted during December 1999

WATER SUPPLY TEST RESULTS

During this visit, the site water supply was tested with the results listed below. These tests indicate the water supply is considered adequate for the sprinkler demand. The fire protection systems were left in service at the end of the visit.

Sprinkler Test - 2" Drains, Alarms, Valves

These tests demonstrate there are no obvious obstructions in the underground piping.

9/8/98	RJC	5	5	110	95	110	yes	yes	9	9	Central station has been installed

Additional Comments: Sprinkler water flow alarms are now being monitored by STAT Communications

Fire Pump Test Results

9/8/98	RJC	Aurora	Test Header	0	1765	-5	119	114	0	119	Good
				1010	1765	-5	108	103	1010	108	Good
				1413	1765	-5	73	68	1413	73	Good

Additional Comments: Annual fire pump test was conducted off the test header using a ¾ inch nozzle on underwriter play-pipes attached to a test stand. Flow from the play-pipes was diverted to the north side of the building. Pitot readings measuring velocity pressure indicated a pitot reading of 33 psi and 32 psi with two lines flowing (1010 gpm) and 25 psi, 29, psi, and 31 psi with 3 lines flowing (1413 gpm). The results of the test were compared to the theoretical pump curve with satisfactory results noted.

LOSS CONTROL PROFILE

Rating: 0, 1, 2 or 3 with '3' as best. 'LPP' = Loss Prevention Program. 'N/A' = Not applicable.

	Loss Control Factor	Guide	Rating	Comments Including LPP Reference
LC1	Construction suited to occupancy	0	3	Recommendation 98-1
LC2	Communicating or adjacent exposures	2	-	
LC3	Suitable compartmentation	2	-	
LC4	Process ignition sources control	2	-	
LC5	Non-process ignition sources control	2	-	
LC6	Housekeeping and denial of fuel	0	2	Recommendation 98-3
LC7	Smoking controls	2	-	
LC8	Permit to work including hot work	2	-	
LC9	Management of visiting contractors	2	-	
LC10	General maintenance - excluding electrical and fire protection	2	-	
LC11	Self inspection and incident investigation	2	-	
LC12	Impairment handling - sprinklers and other fire protection installations	2	-	
LC13	Emergency planning	2	-	
LC14	References taken up - malicious arson	2	-	
LC15	Sprinkler protection - coverage	2	3	Recommendation 98-4 & 98-5
LC16	Sprinkler protection - effectiveness	0	3	Recommendation 98-1
LC17	Fire fighting water supply	2	-	
LC18	Public fire service	2	-	
LC19	Fire team including private fire service	2	-	
LC20	Fire detection and alarm systems	2	-	
LC21	Fire extinguishing appliances	2	-	
LC22	Site security - malicious arson	2	-	
LC23	Special hazards control - process/storage	2	-	
LC24	Natural hazards preparedness	2	-	
LC25	Business continuity plan	N/A	N/A	N/A due to current business practices

N.B. The Loss Prevention Program may include matters other than those referenced above.

Estimated Maximum Loss

Enclosed.

Loss Prevention Program

Enclosed.

Other Enclosures

Fire pump test results curve.

R.J. Clark

Senior Property Technical Specialist

Syracuse Loss Control

315-426-4018

Date: December 7, 1998

(END)

Introduction

Attached are the recommendations that we discussed during my recent tour of your facility. Thank you for your time and cooperation during this visit and if you require any further information pertaining to these recommendations please do not hesitate to contact me.

Program Summary

Item No.	Brief Description	Priority Level	Cost Band
98-1	Foam Insulation in Boiler House & Color Room	1	1
98-2	Warehouse storage clearance	1	1
98-3	Idle wood pallet storage	2	1
98-4	Automatic sprinkler sin machine shop	3	1
98-5	Sprinkler below HVAC duct	3	1
98-6	Replace ¾" sprinkler branch lines	3	2

Cost Bands:

The costs referred to in the Program Summary are estimated and are provided for indicative purposes only.

Cost Band	Ranges
1	0 - 5,000
2	5,000 - 20,000
3	20,000 - 50,000
4	50,000 - plus

PROGRAM

PHYSICAL PROTECTION

LEVEL 1 RECOMMENDATIONS:

Refers to conditions that are considered serious enough to create and/or contribute to hazards which have significant loss potential. We suggest these items should receive top priority in risk improvement budgeting and planning.

98-1 Remove exposed foam insulation located in the Boiler House and in the Color Room or cover foam with a listed fire rated thermal barrier. Exposed foam insulation presents a unique fire hazard that creates a high challenge fire that is difficult to control. Fires that have occurred in facilities with exposed foam insulation have resulted in total losses due to intense heat and structural damage. The foam tends to repel water being discharged from sprinklers allowing fire to spread to other combustibles until the sprinkler system is overwhelmed. For this reason, the foam insulation needs to be removed or covered with a listed fire rated thermal barrier.

98-2 Provide 24-inch aisle clearance between roll paper storage and walls in the warehouse roll paper storage area. NFPA 231F, the *"Standard for the Storage of Roll Paper"*, section 4-3.1 requires a minimum clearance of 24 inches between roll paper and walls. This is due the possibility of rolls expanding if sprinklers discharge. The rolls tend to absorb water causing the roll to expand and push outward on the wall. This additional stress can be sufficient enough to cause collapse

1-800-
344-3555

LEVEL 2 RECOMMENDATIONS:

Items where attention is necessary to improve existing control measures and/or to introduce fundamental loss control techniques.

98-3 Ideally, idle wooden pallets should be stored outside the plant approximately 50 feet from the building; however, if pallets are stored inside, storage heights should be limited to stacks no higher than 6 feet and storage should be away from other combustibles. Storage heights ranged from 6 feet up to 10½ feet in several areas. Idle pallet storage is an ideal arrangement to promote rapid spread of fire, heat release, and complete combustion. Idle pallets tend to dry out and become splintered and frayed making them easily susceptible to ignition from a small ignition source. Fires in stacks of pallets are one of the greatest challenges to sprinklers. The underside of the pallets creates a dry area in which fire can grow and expand to other dry or partially wet areas. This process of jumping to other dry, closely located parallel combustible surfaces continues until the fire bursts through the top of the stack. Once this happens, very little water from sprinklers is able to reach the base of the fire. Because of these shielded areas, large quantities of water are necessary to provide adequate control.

LEVEL 3 RECOMMENDATIONS:

Refers to conditions that present a potential hazard or that may improve your risk to a recognized standard.

98-4 Consideration should be given to extending automatic sprinkler protection into the machine shop on the north side of the boiler house and in the compressor room. This sprinkler installation should be hydraulically designed to provide a minimum density of 0.15 gpm/ft^2 over a 1500 ft^2 area or the entire room whichever is less. Both of these areas have sufficient fuel loads that expose adjoining areas of the plant. To minimize the exposure and limit the potential of fire propagation, automatic sprinkler protection is warranted.

98-5 Extend automatic sprinkler protection beneath the fresh air make up ductwork that was just recently installed. This ductwork was just recently installed and is obstructing ceiling sprinklers located above the ductwork. To ensure proper operation of the sprinkler system to control or extinguish fire, sprinklers need to be installed beneath the ductwork.

98-6 Consideration should be given to replacing the existing ¾" sprinkler branch lines with 1" pipe. ¾ inch sprinkler piping has not been used in the installation of sprinkler systems since 1940 due the restricted flow and encrustation that can occur in smaller diameter piping. Over time, ¾ inch piping can become encrusted to the point where the piping is totally obstructed, preventing the operation of end line sprinklers.

FOOTNOTE: Please note, some of the preceding recommendations may reference a footnote for plans and impairments; see below for further information:

PLANS

Drawings detailing changes in construction, occupancy, and/or protection should be submitted to Royal & SunAlliance in the early stages of design, prior to fabrication of materials. This will allow for the prompt review of changes to a facility and the input of insurance concerns in the early stages of a project.

IMPAIRMENTS

Impairments to the automatic sprinkler system and its related equipment, i.e., fire pumps, water mains, etc., should be coordinated with Royal & SunAlliance by calling 1-800-946-4646 (PIN# 1100633). This will ensure proper precautions are followed in the event that these systems have to be taken out of service, the proper authorities are notified in advance, and to ensure prompt restoration of the system after repairs have been made.

R.J. Clark

Date: December 7, 1998

Senior Property Technical Specialist

Syracuse Loss Control

315-426-4018

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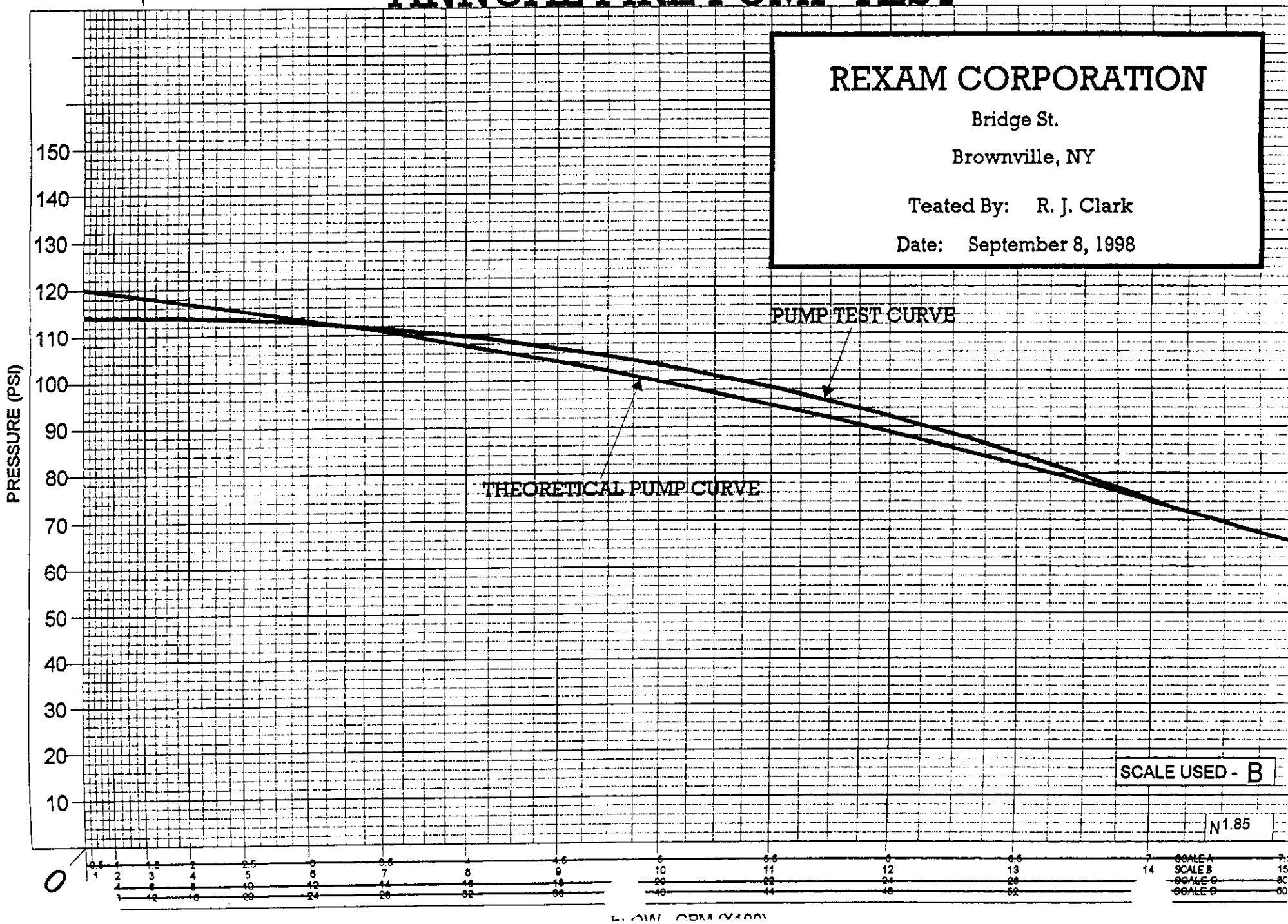
(END)

ROYAL & SUNALLIANCE

ANNUAL FIRE PUMP TEST



CONFIDENTIAL

REXAM PLC
Decorative Specialties International, Inc.
Bridge Street
Brownville, NY 13615
USA

LOSS PREVENTION PROGRAM

Date of Visit:	September 8, 1998
Persons Seen:	Mr. Mark Lappies, Plant Engineer
Prepared By:	R. J. Clark Senior Technical Property Specialist Syracuse Loss Control Tel. No. (315) 426-4018

This program is produced by Global Risks Loss Control, Royal and SunAlliance, whose Quality System is registered by the British Standards Institution, under Certificate of Registration No. FS20726 (BS EN ISO 9002:1994)

ROYAL & SUNALLIANCE

ANNUAL FIRE PUMP TEST

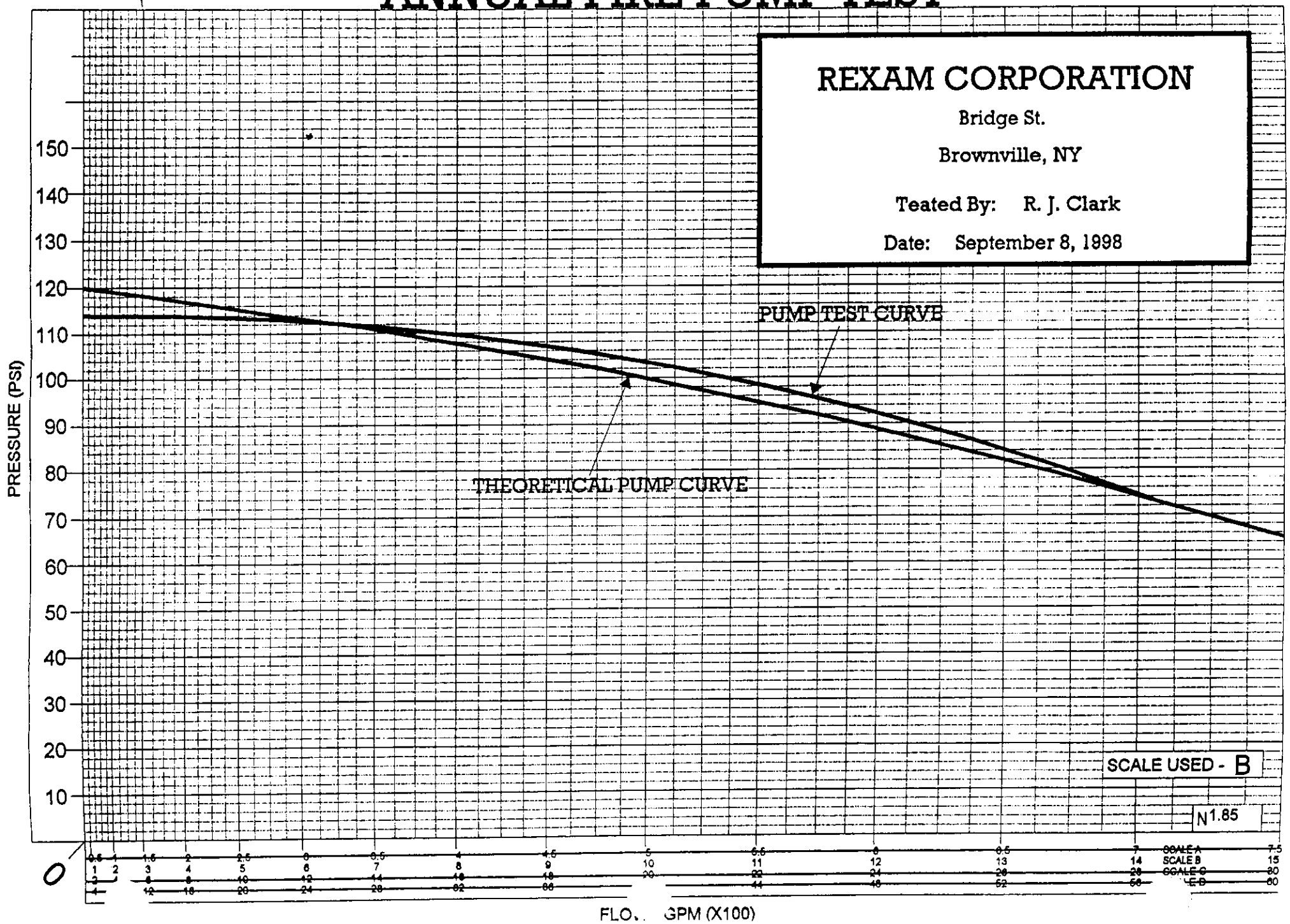
REXAM CORPORATION

Bridge St.

Brownville, NY

Teated By: R. J. Clark

Date: September 8, 1998



CONFIDENTIAL
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PROPERTY REPORT

Producing Office: London
Underwriter: G. Medcalf

Co-ord. Case No: 431888.064

Insured:	**Rexam, Inc.**
Location:	**"Decorative Specialties International, Inc."**
	Bridge Street
	Brownville, NY 13615
	USA
Occupation:	**Paper Manufacturing**
Reason for Visit:	**Property Loss Control Re-survey**
Date of Visit:	**September 8, 1998**
Person Seen:	**Mr. Mark Lappies, Plant Engineering**
Prepared By:	**R. J. Clark**
	Senior Technical Property Specialist
	Syracuse Loss Control Department
	(315) 426-4018

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The liability of Royal & SunAlliance Insurance is limited to the insurance provided under any policies issued in respect of the property or risk concerned.

RISK SUMMARY

Extent of Survey

This site was visited to conduct a property loss control re-survey.

Occupancy

The main plant is a one and 2 story structure with one, two, and three sub-levels below the first floor. Building is 49% ordinary construction (ISO class 2), 46% fire resistive (ISO class 6), and 5% non-combustible (ISO class 4). Ground floor area is approximately 65,000 ft^2 with a total square footage of approximately 102,000 ft^2. The main plant is protected by wet pipe sprinklers covering approximately 80% of the entire building. Automatic sprinkler protection covers nearly 100% of the 1st floor and 2nd floor office areas. The only unsprinklered areas on the 1st and 2nd floor is the boiler house. Across Bridge St. to the east of the main plant is a 16,000 ft^2 one story warehouse of ordinary construction (ISO class 2) protected by a dry pipe sprinkler system covering 100% of the total area.

Principal Changes

No changes in operation have occurred since the previous visit.

The paper-coating machine has been rebuilt. A new freight elevator was installed to allow for easier access to floor levels below grade and a small (est. 12'X 20") air compressor room is now located on the south side of the plant.

Future Developments

No future plans were discussed.

Incident Experience

Management did not present any past loss history.

Class Number

513

Opinion of Risk

Overall improvements are needed in the removal of combustible insulation and storage configurations to improve the risk quality to an acceptable level. Management programs are in place and adequate for the operation.

Recommended Re-survey Date

The next survey should be conducted during December 1999

WATER SUPPLY TEST RESULTS

During this visit, the site water supply was tested with the results listed below. These tests indicate the water supply is considered adequate for the sprinkler demand. The fire protection systems were left in service at the end of the visit.

Sprinkler Test - 2" Drains, Alarms, Valves

These tests demonstrate there are no obvious obstructions in the underground piping.

DATE	BY	QUANTITY		TEST DATA			ALARMS RECEIVED		VALVES		COMMENTS
		Q. Sprinkler	Test Valve	Static (psi)	Residual (psi)	Supply (psi)	Local	Central	Open	Close	
9/8/98	RJC	5	5	110	95	110	yes	yes	9	9	Central station has been installed

Additional Comments: Sprinkler water flow alarms are now being monitored by STAT Communications

Fire Pump Test Results

DATE	BY	TYPE	TESTING THROUGH	TEST DATA					ADJUSTED DATA		RATING
				Q (gpm)	Speed (rpm)	Suction (psi)	Discharge (psi)	Net (psi)	Q (gpm)	Net (psi)	
9/8/98	RJC	Aurora	Test Header	0	1765	-5	119	114	0	119	Good
				1010	1765	-5	108	103	1010	108	Good
				1413	1765	-5	73	68	1413	73	Good

Additional Comments: Annual fire pump test was conducted off the test header using a ¾ inch nozzle on underwriter play-pipes attached to a test stand. Flow from the play-pipes was diverted to the north side of the building. Pitot readings measuring velocity pressure indicated a pitot reading of 33 psi and 32 psi with two lines flowing (1010 gpm) and 25 psi, 29, psi, and 31 psi with 3 lines flowing (1413 gpm). The results of the test were compared to the theoretical pump curve with satisfactory results noted.

LOSS CONTROL PROFILE

Rating: 0, 1, 2 or 3 with '3' as best. 'LPP' = Loss Prevention Program. 'N/A' = Not applicable.

	Loss Control Factor	Rating	Rating with LPP	Comments including LPP Reference
LC1	Construction suited to occupancy	0	3	Recommendation 98-1
LC2	Communicating or adjacent exposures	2	-	
LC3	Suitable compartmentation	2	-	
LC4	Process ignition sources control	2	-	
LC5	Non-process ignition sources control	2	-	
LC6	Housekeeping and denial of fuel	0	2	Recommendation 98-3
LC7	Smoking controls	2	-	
LC8	Permit to work including hot work	2	-	
LC9	Management of visiting contractors	2	-	
LC10	General maintenance - excluding electrical and fire protection	2	-	
LC11	Self inspection and incident investigation	2	-	
LC12	Impairment handling - sprinklers and other fire protection installations	2	-	
LC13	Emergency planning	2	-	
LC14	References taken up - malicious arson	2	-	
LC15	Sprinkler protection - coverage	2	3	Recommendation 98-4 & 98-5
LC16	Sprinkler protection - effectiveness	0	3	Recommendation 98-1
LC17	Fire fighting water supply	2	-	
LC18	Public fire service	2	-	
LC19	Fire team including private fire service	2	-	
LC20	Fire detection and alarm systems	2	-	
LC21	Fire extinguishing appliances	2	-	
LC22	Site security - malicious arson	2	-	
LC23	Special hazards control - process/storage	2	-	
LC24	Natural hazards preparedness	2	-	
LC25	Business continuity plan	N/A	N/A	N/A due to current business practices

N.B. The Loss Prevention Program may include matters other than those referenced above.

Estimated Maximum Loss

Enclosed.

Loss Prevention Program

Enclosed.

Other Enclosures

Fire pump test results curve.

R.J. Clark

Date: December 7, 1998

Senior Property Technical Specialist

Syracuse Loss Control

315-426-4018

(END)

CONFIDENTIAL

REXAM PLC
Decorative Specialties International, Inc.
Bridge Street
Brownville, NY 13615
USA

LOSS PREVENTION PROGRAM

Date of Visit:	September 8, 1998
Persons Seen:	Mr. Mark Lappies, Plant Engineer
Prepared By:	R. J. Clark Senior Technical Property Specialist Syracuse Loss Control Tel. No. (315) 426-4018

This program is produced by Global Risks Loss Control, Royal and SunAlliance, whose Quality System is registered by the British Standards Institution, under Certificate of Registration No. FS20726 (BS EN ISO 9002:1994)

Introduction

Attached are the recommendations that we discussed during my recent tour of your facility. Thank you for your time and cooperation during this visit and if you require any further information pertaining to these recommendations please do not hesitate to contact me.

Program Summary

Item No.	Brief Description	Priority Level	Cost Band
98-1	Foam Insulation in Boiler House & Color Room	1	1
98-2	Warehouse storage clearance	1	1
98-3	Idle wood pallet storage	2	1
98-4	Automatic sprinkler sin machine shop	3	1
98-5	Sprinkler below HVAC duct	3	1
98-6	Replace ¾" sprinkler branch lines	3	2

Cost Bands:

The costs referred to in the Program Summary are estimated and are provided for indicative purposes only.

Cost Band	Ranges in $
1	0 - 5,000
2	5,000 - 20,000
3	20,000 - 50,000
4	50,000 - plus

PROGRAM

PHYSICAL PROTECTION

LEVEL 1 RECOMMENDATIONS:

Refers to conditions that are considered serious enough to create and/or contribute to hazards which have significant loss potential. We suggest these items should receive top priority in risk improvement budgeting and planning.

98-1 Remove exposed foam insulation located in the Boiler House and in the Color Room or cover foam with a listed fire rated thermal barrier. Exposed foam insulation presents a unique fire hazard that creates a high challenge fire that is difficult to control. Fires that have occurred in facilities with exposed foam insulation have resulted in total losses due to intense heat and structural damage. The foam tends to repel water being discharged from sprinklers allowing fire to spread to other combustibles until the sprinkler system is overwhelmed. For this reason, the foam insulation needs to be removed or covered with a listed fire rated thermal barrier.

98-2 Provide 24-inch aisle clearance between roll paper storage and walls in the warehouse roll paper storage area. NFPA 231F, the *"Standard for the Storage of Roll Paper"*, section 4-3.1 requires a minimum clearance of 24 inches between roll paper and walls. This is due the possibility of rolls expanding if sprinklers discharge. The rolls tend to absorb water causing the roll to expand and push outward on the wall. This additional stress can be sufficient enough to cause collapse

LEVEL 2 RECOMMENDATIONS:

Items where attention is necessary to improve existing control measures and/or to introduce fundamental loss control techniques.

98-3 Ideally, idle wooden pallets should be stored outside the plant approximately 50 feet from the building; however, if pallets are stored inside, storage heights should be limited to stacks no higher than 6 feet and storage should be away from other combustibles. Storage heights ranged from 6 feet up to 10½ feet in several areas. Idle pallet storage is an ideal arrangement to promote rapid spread of fire, heat release, and complete combustion. Idle pallets tend to dry out and become splintered and frayed making them easily susceptible to ignition from a small ignition source. Fires in stacks of pallets are one of the greatest challenges to sprinklers. The underside of the pallets creates a dry area in which fire can grow and expand to other dry or partially wet areas. This process of jumping to other dry, closely located parallel combustible surfaces continues until the fire bursts through the top of the stack. Once this happens, very little water from sprinklers is able to reach the base of the fire. Because of these shielded areas, large quantities of water are necessary to provide adequate control.

LEVEL 3 RECOMMENDATIONS:

Refers to conditions that present a potential hazard or that may improve your risk to a recognized standard.

98-4 Consideration should be given to extending automatic sprinkler protection into the machine shop on the north side of the boiler house and in the compressor room. This sprinkler installation should be hydraulically designed to provide a minimum density of 0.15 gpm/ft^2 over a 1500 ft^2 area or the entire room whichever is less. Both of these areas have sufficient fuel loads that expose adjoining areas of the plant. To minimize the exposure and limit the potential of fire propagation, automatic sprinkler protection is warranted.

98-5 Extend automatic sprinkler protection beneath the fresh air make up ductwork that was just recently installed. This ductwork was just recently installed and is obstructing ceiling sprinklers located above the ductwork. To ensure proper operation of the sprinkler system to control or extinguish fire, sprinklers need to be installed beneath the ductwork.

98-6 Consideration should be given to replacing the existing ¾" sprinkler branch lines with 1" pipe. ¾ inch sprinkler piping has not been used in the installation of sprinkler systems since 1940 due the restricted flow and encrustation that can occur in smaller diameter piping. Over time, ¾ inch piping can become encrusted to the point where the piping is totally obstructed, preventing the operation of end line sprinklers.

FOOTNOTE: Please note, some of the preceding recommendations may reference a footnote for plans and impairments; see below for further information:

PLANS

Drawings detailing changes in construction, occupancy, and/or protection should be submitted to Royal & SunAlliance in the early stages of design, prior to fabrication of materials. This will allow for the prompt review of changes to a facility and the input of insurance concerns in the early stages of a project.

IMPAIRMENTS

Impairments to the automatic sprinkler system and its related equipment, i.e., fire pumps, water mains, etc., should be coordinated with Royal & SunAlliance by calling 1-800-946-4646 (PIN# 1100633). This will ensure proper precautions are followed in the event that these systems have to be taken out of service, the proper authorities are notified in advance, and to ensure prompt restoration of the system after repairs have been made.

R.J. Clark

Date: December 7, 1998

Senior Property Technical Specialist

Syracuse Loss Control

315-426-4018

The purpose of this loss prevention program is to provide underwriting information and to assist the Proposer or Insured in its management of risks. The recommendations are based on conditions observed and information made available at the time of the inspection and do not imply compliance with statutory or local regulatory requirements or that there are no other risks or hazards. Implementation of the loss control measures is the responsibility of the Proposer or Insured.

The liability of Royal & SunAlliance Insurance is limited to the insurance provided under any policies issued in respect of the property or risk concerned.

(END)

APPENDIX 43

March 2000 Limited Industrial Hygiene Survey

Author: Steve M Lange at RDSI-US-BVL-PO01
Date: 3/14/00 3:34 PM
Normal

43

TO: Norman K Tomlinson
TO: Art H Hilts
TO: Harold Hine
TO: Elizabeth A Krowl
TO: Mark F Lappies
TO: George T Nebel at RDSI-US-SHD-PO01
TO: Dennis C Trombley
CC: Robert J Murphy at RDSI-US-SHD-PO01
CC: John H Mumper at RDSI-US-WSP-PO01
CC: Jonathan J Rose at RDSI-US-LVL-PO01
Subject: Formaldehyde
---------- Message Contents

A few weeks ago Hartford Loss Control Industrial Hygienist Tom Marino sampled some of our work areas for formaldehyde.

OSHA action limits are	0.5 ppm for 8 hours
Permissible Exposure Level	0.75 ppm for 8 hours
Short Term Exposure Level	2.00 ppm for 15 minutes

These are based on operator exposure. Our tests were done on area exposure (worst case scenario), and none of these areas are occupied full time, some not at all.

Our areas were sampled for approximately 5 hours, and the following time weighted data was collected.

Areas were selected due to materials used in the area, specifically 100 HS in the coater area and 8162 in the saturator area. Both products were in use during this sampling.

COATER	
Coater Kitchen (above run tanks (J&K coatings))	0.34ppm
Between coater ovens	0.52ppm
In the 100 HS bulk tank headspace (top closed)	1.43ppm
SATURATOR	
Saturator Kitchen (above run tank)	0.44ppm
Directly above saturator	0.50ppm
In 8162 drum headspace (lid closed)	2.06ppm

The only areas that are occupied are the two kitchen areas, and those are not occupied full time.

I've discussed this with Tom Marino, there is no cause for further testing or any action plans. If he is in the area again we may have samples run on operators (with operators wearing the badges) With the above worst case scenario levels there should be no concern with the levels that operators, with intermittent exposure times, are exposed to.

sml

Formaldehyde Sampling Rexam DSI Brownville,NY					
	Location	**Type of sample**	**Typical Employee Exposure Time/ 8 hour shift**	**Formaldehyde PPM**	**Comments**
	Coater Kitchen	Area	3 hours	0.34	Between run tanks containing J & K Ctgs. 3 feet above tank tops
	Between Coater Ovens	Area	< 1 hour	0.52	Between Coater Ovens while running J & K, 3 feet above web entry into 2nd oven
	In 100 HS bulk tank headspace (top closed)	Area	0	1.43	
	Saturator Kitchen	Area	3 hours	0.44	3 feet above tops of run tanks
	8162 Drum headspace (lid closed)	Area	0	2.06	
	Saturator	Area	< 1 hour	0.6	2 feet above Saturator

Date	Time	Compound	ppm	location	grade
17-Apr-98	10:00 AM	Acetic Acid	4	inside the currtain at dryer X	8594 Red
17-Apr-98	10:00 AM	Acetic Acid	18	at sheet temp gauge before the PM calender	8594 Red
24-Apr-98	8am-4pm	Acetic Acid	70/8	3rd Hand Monitor	8594 Red&Black
24-Apr-98	8am-4pm	Acetic Acid	90/8	BT Station	8594 Red&Black
5-Jun-98	8am-4pm	Acetic Acid	90/8	3rd Hand Monitor	8594 Red&Black
5-Jun-98	8am-4pm	Acetic Acid	70/8	BT Station	8594 Red&Black

APPENDIX 44

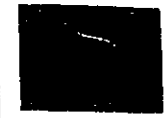
1992 Noise Survey

NOTICE

NOISE SURVEY

A NOISE SURVEY WAS CONDUCTED AT BROWNVILLE TO PROVIDE INFORMATION ON EACH JOB AND AREA IN THE MILL. O.S.H.A. STANDARDS REQUIRE THAT IF AN AREA MEETS OR EXCEEDS 85 dB'S ON THE AVERAGE FOR AN 8 HOUR PERIOD, HEARING PROTECTION IS REQUIRED. BASED ON THE RESULTS OF THE SURVEY, BROWNVILLE WILL BE ADOPTING A HEARING CONSERVATION POLICY WHICH STATES THAT HEARING PROTECTION WILL BE REQUIRED FOR THOSE EMPLOYEES WORKING IN PRODUCTION AREAS OF THE MILL EFFECTIVE JANUARY 1, 1990. THE ONLY EXCEPTIONS ARE NON-PRODUCTION AREAS (UPSTAIRS OFFICE, FOREMAN'S OFFICE, MAINTENANCE FOREMAN'S OFFICE, LAB AND WAREHOUSE, MAINTENANCE SHOP, BOILER ROOM OFFICE, LOADING DOCK AND RESTROOM). THIS POLICY HAS BEEN ADOPTED TO INSURE PROTECTION FOR THE BROWNVILLE EMPLOYEES AND IT WILL BE ENFORCED STARTING JANUARY 1, 1990.

IF ANYONE WISHES TO OBTAIN PROPER HEARING PROTECTION DEVICES OTHER THAN WHAT IS CURRENTLY AVAILABLE AT BROWNVILLE, PLEASE CONTACT THE FOREMAN ON YOUR SHIFT OR ANY MEMBER OF THE SAFETY COMMITTEE.



Decorative

Specialties

International

Incorporated

DECORATIVE SPECIALTIES INTERNATIONAL
HEARING CONSERVATION PROGRAM
BROWNVILLE

IT IS THE COMPANY'S POLICY TO COMPLY WITH OSHA OCCUPATIONAL NOISE EXPOSURE REGULATIONS (1910.85), AND TO PROVIDE AN EFFECTIVE HEARING CONSERVATION PROGRAM FOR EMPLOYEES. IT IS THE RESPONSIBILITY OF MANAGEMENT TO:

1. ASSIST IN THE CONTROL OF NOISE EXPOSURES TO WITHIN SAFE LEVELS.

2. PREVENTION OF HEARING LOSS AMONG EMPLOYEES BY PROVIDING FOR THE DETECTION OF HEARING LOSS AND PROVIDING PROTECTIVE DEVICES TO EMPLOYEES WHO WORK IN AREAS WHERE NOISE IS OF POTENTIALLY HARMFUL INTENSITY.

A PROGRAM TO CONTROL EXPOSURE TO HAZARDOUS NOISE IS PART OF THE COMPANY'S SAFETY PROGRAM, AND PROVIDES FOR:

MONITORING:

IDENTIFY THOSE AREAS WHERE EMPLOYEES ARE EXPOSED AT OR ABOVE AN 8-HOUR TIME WEIGHTED AVERAGE OF 85 DECIBELS.

NOISE LEVELS SHOULD BE DETERMINED BY PERIODIC SURVEYS THROUGH OUT THE MILL.

ELIMINATION OF NOISE AT ITS SOURCE, WHENEVER POSSIBLE.

AUDIOMETRIC TESTING:

SCHEDULES FOR TESTING AUDIOMETRIC MEASUREMENTS SHOULD BE TAKEN ON ALL NEW EMPLOYEES.

ANNUAL AUDIOMETRIC MEASUREMENTS SHOULD BE TAKEN ON ALL EMPLOYEES EXPOSED TO NOISE LEVELS THAT EQUAL OR EXCEED AN 8 HOUR TIME-WEIGHTED AVERAGE OF 85 DECIBELS MEASURED ON THE A SCALE.

Bridge Street, Brownville, New York 13615 Tel: 315 - 782-5800 Fax: 315 - 782-5416

Decorative

Specialties

International

Incorporated

TRAINING:

ALL EMPLOYEES EXPOSED AT THE ACTION LEVEL MUST BE TRAINED ANNUALLY ON THE EFFECTS OF NOISE ON THE EAR.

INSTRUCTING EMPLOYEES IN THE USE AND CARE OF PROTECTIVE DEVICES.

EXPLAIN THE PURPOSE AND PROCEDURES FOR THE AUDIOMETRIC TESTING.

ALL NEW EMPLOYEES WILL BE INITIALLY TRAINED CONCERNING THE COMPANY'S HEARING CONSERVATION PROGRAM AND THE EFFECTS OF NOISE ON THE INDIVIDUAL.

PROTECTION DEVICES:

THE COMPANY HAS SELECTED SEVERAL TYPES OF EAR PLUGS AND MUFFS WHICH ARE AVAILABLE THROUGH OUT THE MILL. ONLY APPROVED EAR PLUGS AND MUFFS ARE TO BE USED.

PROCEDURES:

MAINTAIN THE RECORDS OF AUDIOMETRIC FINDINGS.

ALL AUDIOGRAMS ARE READ BY AN AUDIOLOGIST AND RECOMMENDATIONS ARE MADE. A COPY OF THE EMPLOYEES TEST AND RECOMMENDATIONS ARE GIVEN TO THE EMPLOYEE.

Bridge Street, Brownville, New York 13615 Tel: 315 - 782-5800 Fax: 315 - 782-5416

THE HOME
INSURANCE
COMPANY

THE ATRIUM
SUITE 350
2 CLINTON SQUARE
SYRACUSE NY 13202
315 472 4761

P.O. BOX 4869
SYRACUSE NY 13221

September 10, 1992

Mr. Nick Arvan
Resident Manager
Decorative Specialities International, Inc.
Bridge Street
Brownville, New York 13615

Dear Mr. Arvan:

Attached is a copy of the noise exposure evaluation conducted at the Decorative Specialities International manufacturing facilities on September 3, 1992.

As per the attached data sheet, several areas in the manufacturing facility had noise levels above the action level of 85 dBA. Additionally, several work station areas also had noise level measurements at or above the 90 dBA permissible exposure limit.

Discussion regarding the facilities Hearing Conservation Program disclosed that the program covers the appropriate segments regarding employee training, baseline and annual audiogram testing, provided use of hearing protection and continued engineering and administrative controls to help reduce the employees' exposure. These are commensurate with the Occupational Noise Standard 1910.95, therefore, no recommendations are being submitted.

Sincerely,

Joseph A. Sobczak

Joseph A. Sobczak, ALCM
Loss Control Consultant

JAS:jm
JS.4

THE HOME INSURANCE COMPANY

HOME 1853

Industrial Hygiene Survey Report

DECORATIVE SPECIALITIES INTERNATIONAL, INC.
BRIDGE STREET
BROWNVILLE, NEW YORK 13615

Prepared by JOSEPH A. SOBCZAK, ALCM
LOSS CONTROL CONSULTANT

SEPTEMBER 4, 1992

Loss Control Department - SYRACUSE, NEW YORK

See important notice on reverse side

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III. Recommended Plan of Action 3

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Decorative Specialities International, Inc.
Bridge Street
Brownville, New York 13615

Contact was made with Mr. John Greenwood, Manager of Administration and Mr. Art Hilts, Production Manager on September 3, 1992 for the purpose of evaluating the noise level exposures in the manufacturing and warehouse facilities.

Noise measurements were taken and work practices and procedures were observed and discussed. The noise results represent conditions found at the time of the visit only, and may not represent conditions at other times. We took noise measurements to estimate workplace exposures and not to determine compliance or non-compliance with regulatory or legal standards.

The conclusions in the Exposure Evaluation section of this report are based on the noise measurements and work practices observed on this date. The noise measurements are outlined in the Data section of this report on the provided floor plan.

At the completion of this survey, we discussed our preliminary findings based on standard Industrial Hygiene and safety practices and procedures.

H33335 F Rev. 7-83

NOISE EXPOSURE EVALUATION

The sound level meter test results obtained during this evaluation disclosed that several of the work station areas were at or above the action level of 85 dBa and also of that of the permissible exposure limit of 90 dBa as shown on the attached floor plan data sheet. Existing noise control technologies (engineering controls) have been attempted where practical to help reduce noise levels throughout the manufacturing areas. However, in many instances, they are not practical nor feasible, therefore strong adherence to the Hearing Conservation Program including the use of hearing protection, audiometric testing and employee training requirements is implemented as a means to help protect the employees from occupational noise induced hearing loss.

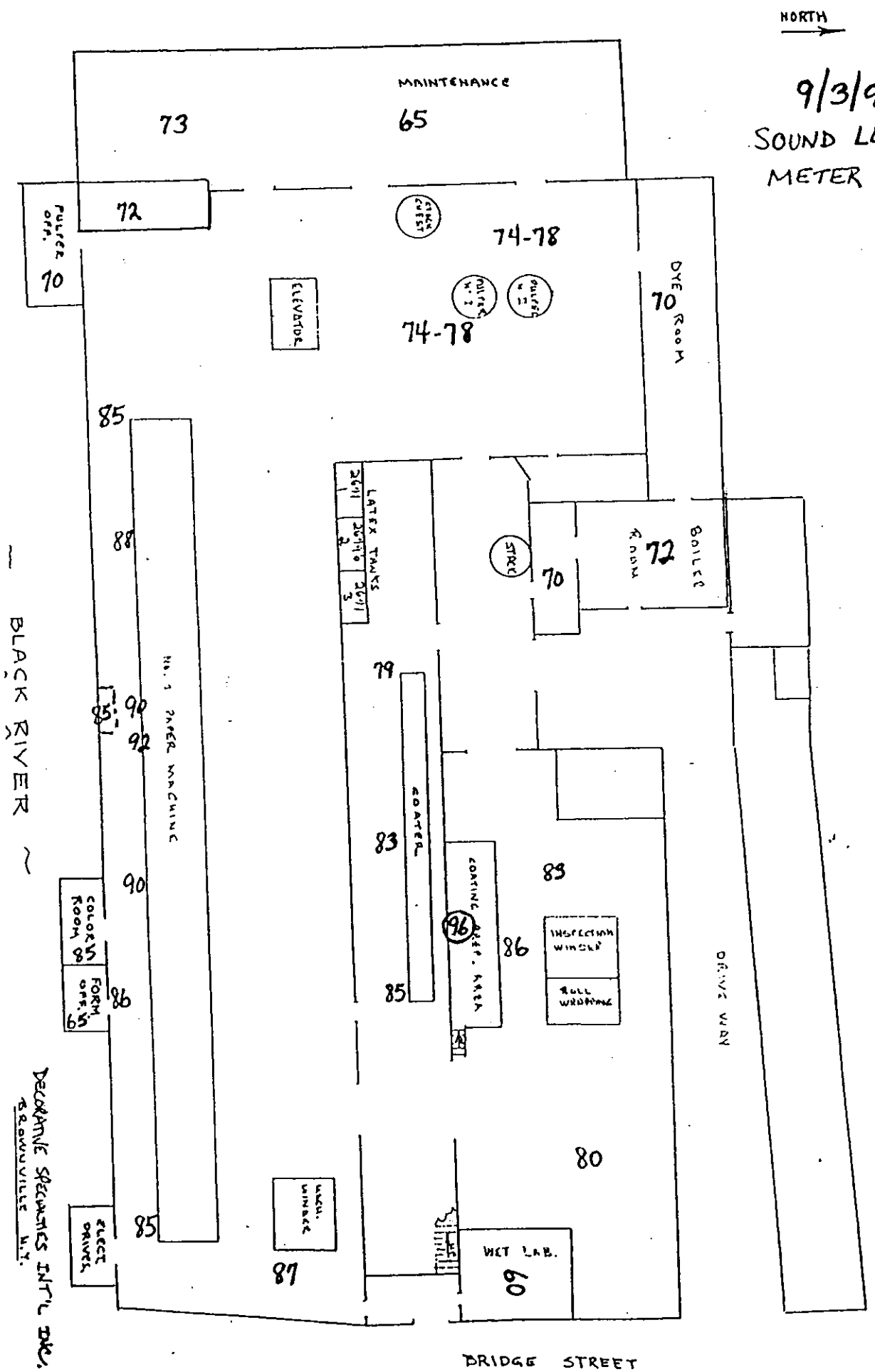
RECOMMENDED PLAN OF ACTION

Based on the present status of the facility's implementation of a formal Hearing Conservation Program being presently devised in a full, written format, critical topic areas such as baseline and annual audiometric testing, employee training, use of hearing protection, and implementation of engineering and/or administrative controls wherever feasible are considered adequate, therefore no recommendation is being submitted.

DISCUSSION

NOISE EVALUATION

With the implementation of the present Hearing Conservation Program as presently in place, and with the results obtained, it was discussed and agreed upon that the present program will continue to be administered with appropriate changes and methods of corrective action followed depending on the facility's requirements. This would incorporate such items as future noise evaluation testing such as when the new sludge press is put on line and operational (to be completed in our November service visit).


NORTH
9/3/92
SOUND LEVEL
METER TESTS
MAINTENANCE
73
65
72
PULPER OFF.
70
74-78
ELEVATOR
74-78
DYE ROOM
70
85
88
LATEX TANKS
STEC
70
BOILER ROOM
72
79
90
92
85
NO. 1 PAPER MACHINE
COATER
83
COATING PREP. AREA
96
86
83
INSPECTION WINDER
ROLL WRAPPING
90
COLORS ROOM
85
FORM OFF.
65
86
DRIVE WAY
80
85
ELECT. DRIVES
MACH. WINDER
87
WET LAB.
60
BRIDGE STREET
BLACK RIVER
DECORATIVE SPECIALTIES INT'L INC.
BROWNVILLE N.Y.

WAREHOUSE

APPENDIX I

TECHNICAL DEFINITIONS

1. *Permissible Exposure Level (PEL) - Is that which is allowed for an eight (8) hour workday. Occupational Safety and Health Administration (OSHA) Standard is 90 dBa = 100% and 85 dBa = 50% (action level) for eight (8) hours.*

2. *dBA - The noise level measured in decibels (dB) using the "A" weighted network. The "A" network on a sound level meter causes the meter to vary with the frequency and intensity of sound much like the human ear.*

APPENDIX 45

Air Permit and Reporting Information

New York State Department of Environmental Conservation
Division of Environmental Permits, Region 6
Dulles State Office Building, 317 Washington Street, Watertown, New York 13601-3787
Phone: (315) 785-2245 FAX: (315) 785-2242

John P. Cahill
Commissioner

August 30, 1999

Steven M. Lange
Rexam DSI - Brownville
Bridge Street
Brownville, New York 13615

RE: Air State Facility Permit
Permit #6-2226-00120/00009

Dear Mr. Lange:

Enclosed you will find a validated State Facility Permit for the above referenced air contamination source. Please read the document over carefully and note any Special Conditions. This permit does not have any expiration date. If you propose any modifications please submit these for inclusion into the enclosed permit.

If you have any questions, please contact this office.

Sincerely,

C. Randy Vaas

C. Randy Vaas
Regional Permit Administrator
Region 6

CRV:dmt
cc: Chris Lalone

Enclosure

95-20-6 (1/96)--25c R6

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

DEC PERMIT NUMBER
6-2226-00120/00009

FACILITY/PROGRAM NUMBER(s)
2226010217

PERMIT

Under the Environmental Conservation Law (ECL)

EFFECTIVE DATE
August 27, 1999

EXPIRATION DATE

TYPE OF PERMIT (Check All Applicable Boxes)
☒ New ☐ Renewal ☐ Modification ☐ Permit to Construct ☒ Permit to Operate

☐ Article 15, Title 5: Protection of Water	☐ Article 17, Titles 7, 8: SPDES	☐ Article 27, Title 9; 6NYCRR 373: Hazardous Waste Management
☐ Article 15, Title 15: Water Supply	☒ Article 19: Air Pollution Control	☐ Article 34: Coastal Erosion Management
☐ Article 15, Title 15: Water Transport	☐ Article 23, Title 27: Mined Land Reclamation	☐ Articles 1, 3, 17, 19, 27, 37; 6NYCRR 380: Radiation Control
☐ Article 15, Title 15: Long Island Wells	☐ Article 24: Freshwater Wetlands	☐ Other: _____
☐ Article 15, Title 27: Wild, Scenic and Recreational Rivers	☐ Article 25: Tidal Wetlands	
☐ 6NYCRR 608: Water Quality Certification	☐ Article 27, Title 7; 6NYCRR 360: Solid Waste Management	

PERMIT ISSUED TO
Rexam DSI

TELEPHONE NUMBER
(413)533-0699

ADDRESS OF PERMITTEE
1 Canal Street, South Hadley, MA 01075

CONTACT PERSON FOR PERMITTED WORK
Steven M. Lange

TELEPHONE NUMBER
(315)782-5800

NAME AND ADDRESS OF PROJECT/FACILITY
Rexam DSI - Brownville, Bridge Street, Brownville, NY 13615

LOCATION OF PROJECT/FACILITY
Bridge Street

COUNTY	~~TOWN/CITY/VILLAGE~~	~~WATERCOURSE/WETLAND NO.~~	NYTM COORDINATES
Jefferson	Brownville (T)		E: 421 . 2 N:4 872 . 2

DESCRIPTION OF AUTHORIZED ACTIVITY
To operate Emission Unit #00001 with Federally Enforceable conditions to limit VOC, HAP, and SO_2 considered to "cap" emissions below the applicable threshold level as set forth in 6 NYCRR Part 201-6.

By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified (See Page 2) and any Special Conditions included as part of this permit.

PERMIT ADMINISTRATOR	ADDRESS	
C. Randy Vaas	317 Washington Street, Watertown, New York 13601	
AUTHORIZED SIGNATURE C Randy Vaas	DATE August 27, 1999	Page 1 of 3

DCS1:PERMITP1 4/97

NOTIFICATION OF OTHER PERMITTEE OBLIGATIONS

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

The permittee expressly agrees to indemnify and hold harmless the Department of Environmental Conservation of the State of New York, its representatives, employees, agents, and assigns for all claims, suits, actions, damages, and costs of every name and description arising out of or resulting from the permittee's undertaking of activities or operation and maintenance of the facility or facilities authorized by the permit in compliance or non-compliance with the terms and conditions of the permit.

Item B: Permittee's Contractors to Comply with Permit

The permittee is responsible for informing its independent contractors, employees, agents and assigns of their responsibility to comply with this permit, including all special conditions while acting as the permittee's agent with respect to the permitted activities, and such persons shall be subject to the same sanctions for violations of the Environmental Conservation Law as those prescribed for the permittee.

Item C: Permittee Responsible for Obtaining Other Required Permits

The permittee is responsible for obtaining any other permits, approvals, lands, easements and rights-of-ways that may be required to carry out the activities that are authorized by this permit.

Item D: No Right to Trespass or Interfere with Riparian Rights

This permit does not convey to the permittee any right to trespass upon the lands or interfere with the riparian rights of others in order to perform the permitted work nor does it authorize the impairment of any rights, title, or interest in real or personal property held or vested in a person not a party to the permit.

GENERAL CONDITIONS

General Condition 1: Facility Inspection by the Department

The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

General Condition 2: Relationship of this Permit to Other Department Orders and Determinations

Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

General Condition 3: Applications for Permit Renewals or Modifications

The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

The permittee must submit a renewal application at least:

a) 180 days before expiration of permits for State Pollutant Discharge Elimination System (SPDES), Hazardous Waste Management Facilities (HWMF), major Air Pollution Control (APC) and Solid Waste Management Facilities (SWMF); and

b) 30 days before expiration date of all other permit types.

Submission of applications for permit renewal or modification are to be submitted to:

NYS DEC Regional Permit Administrator, Region 6

317 Washington Street, Watertown, New York 13601, telephone: 315-785-2245

General Condition 4: Permit Modifications, Suspensions and Revocations by the Department.

The Department reserves the right to modify, suspend or revoke this permit. The grounds for modification, suspension or revocation include

a) the scope of the permitted activity is exceeded or a violation of any condition of the permit or provisions of the ECL and pertinent regulations if found;

b) the permit was obtained by misrepresentation or failure to disclose relevant facts;

c) new material information is discovered; or

d) environmental conditions, relevant technology, or applicable law or regulation have materially changed since the permit was issued.

SPECIAL CONDITIONS

For Article 19 (Air Pollution Control)

PERMIT TO OPERATE
AIR CONTAMINATION SOURCES

Facility Limits:

1. The amount of #6 fuel oil burned in the 30.9 MMBtu/hr boiler (emission point #00001) shall not exceed 801,000 gallons, during any 12 month period.

2. The sulfur content of #6 fuel oil burned in the 30.9 MMBtu/hr boiler (emissions point #00001) shall not exceed 1.5 % by weight.

3. Source owner shall only burn #6 fuel oil in the 30.9 MMBtu/hr boiler (emissions point #00001). Combustion of #6 fuel oil in any other emission source at the facility is prohibited.

4. This facility's volatile organic compounds (VOC) emissions shall be less than 50 tons during any consecutive 12 month period. In addition, hazardous air pollutants (HAP) as defined in section 112b of the Clean Air Act, are limited as follows: facility emissions of each individual HAP shall be less than 10 tons during any consecutive 12 month period. Also, the facility's total HAP emissions shall be less than 25 tons during any consecutive 12 month period.

5. The coatings applied at this process are subject to 6 NYCRR Part 228.7, Table 1 (Paper Coating Lines). The maximum allowable volatile organic compound (VOC) content of the coatings, as applied, is 2.9 pounds/gallon. The VOC content of the applied coatings shall be calculated in accordance with 6 NYCRR Part 228.2(b)(11).

6. Source owner shall submit an application for a state facility permit on or before December 9, 2000. Such application shall meet the requirements of 6 NYCRR Part 201-5.2.

Recordkeeping and Reporting:

7. The source owner or operator shall operate and maintain a flow meter which verifies the usage of #6 fuel oil at emission point #00001.

8. The source owner or operator shall maintain records of the monthly usage of #6 fuel oil at emission point #00001. In addition source owner shall maintain records showing the #6 fuel oil usage, during any consecutive 12 month period.

SPECIAL CONDITIONS

9. The source owner or operator shall maintain records of the sulfur content of #6 fuel oil burned at emission point #00001. These records shall be comprised of the supplier performed chemical analysis for each delivery of #6 fuel oil.

10. The records required by conditions #7, 8 & 9 shall be reported annually, in a format acceptable to this Department, to the Regional Air Pollution Control Engineer, NYSDEC, 317 Washington Street, Watertown, New York, 13601. Such reports shall be made by February 15th of each year.

11. The records required by conditions #7, 8 & 9 shall be available after the tenth (10) day of each new calendar month for inspection by NYSDEC or USEPA during normal business hours.

12. The source owner must maintain records that verify the facility's monthly VOC and HAP emissions. These records must be maintained at the facility for a period of five years.

13. Reports will be submitted annually, in a format acceptable to the commissioner's representative, which document that the facility's VOC emissions during any consecutive 12 month period were less than 50 tons. The report shall also document that individual HAP and total HAP emissions were less than 10 tons and 25 tons respectively during any consecutive 12 month period. In addition, a letter certifying that the facility has not exceeded the VOC and HAP emission limits contained in condition #4, will be sent to the NYSDEC, Region 6, by February 15th of each year.

14. The annual reports, required by condition #13, must include information that documents the VOC and HAP content and quantity of all coatings, saturants, and dyes utilized. The report should also include VOC and HAP emissions from any solvents/diluents which are used for viscosity control or cleanup, as well as, VOC and HAP emissions from all other processes at the facility.

15. Source owner must maintain records, as specified in 6 NYCRR Part 228.5(a), which verify the following:

    i. VOC content of all coatings used at the facility. This should be a certification from the coating supplier/manufacturer which verifies the parameters used to determine the VOC content.

    ii. Quantity of coatings, and other VOC containing materials, purchased and utilized at the facility.

16. The records specified in condition #15 must be submitted to the Department upon request.

17. Any exceedance of the limits in conditions #1, 2, 3, 4 or 5 must be reported to the Department, in writing, within thirty (30) days of the occurrence, to the Regional Air Pollution Control Engineer, NYSDEC, 317 Washington Street, Watertown, New York, 13601.

18. Representatives of the Department shall be permitted, during reasonable business hours, entrance to the facility to perform inspections, review emission records and obtain coating samples to confirm compliance with the above operating conditions.

CRV:dmt

PERMIT TO OPERATE
AIR CONTAMINATION SOURCES

OWNER: *REXAM DSI*

FACILITY: *BRIDGE STREET*
BROWNVILLE, NY 13615

Facility Limits:

1. The amount of #6 fuel oil burned in the 30.9 MMBtu/hr boiler (emission point #00001) shall not exceed 801,000 gallons, during any 12 month period.

2. The sulfur content of #6 fuel oil burned in the 30.9 MMBtu/hr boiler (emissions point #00001) shall not exceed 1.5 % by weight.

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7. The source owner or operator shall operate and maintain a flow meter which verifies the usage of #6 fuel oil at emission point #00001.

8. The source owner or operator shall maintain records of the monthly usage of #6 fuel oil at emission point #00001. In addition source owner shall maintain records showing the #6 fuel oil usage, during any consecutive 12 month period.

9. The source owner or operator shall maintain records of the sulfur content of #6 fuel oil burned at emission point #00001. These records shall be comprised of the supplier performed chemical analysis for each delivery of #6 fuel oil.

10. The records required by conditions #7, 8 & 9 shall be reported annually, in a format acceptable to this Department, to the Regional Air Pollution Control Engineer, NYSDEC, 317 Washington Street, Watertown, New York, 13601. Such reports shall be made by February 15th of each year.

11. The records required by conditions #7, 8 & 9 shall be available after the tenth (10) day of each new calendar month for inspection by NYSDEC or USEPA during normal business hours.

12. The source owner must maintain records that verify the facility's monthly VOC and HAP emissions. These records must be maintained at the facility for a period of five years.

13. Reports will be submitted annually, in a format acceptable to the commissioner's representative, which document that the facility's VOC emissions during any consecutive 12 month period were less than 50 tons. The report shall also document that individual HAP and total HAP emissions were less than 10 tons and 25 tons respectively during any consecutive 12 month period. In addition, a letter certifying that the facility has not exceeded the VOC and HAP emission limits contained in condition #4, will be sent to the NYSDEC, Region 6, by February 15th of each year.

14. The annual reports, required by condition #13, must include information that documents the VOC and HAP content and quantity of all coatings, saturants, and dyes utilized. The report should also include VOC and HAP emissions from any solvents/diluents which are used for viscosity control or cleanup, as well as, VOC and HAP emissions from all other processes at the facility.

15. Source owner must maintain records, as specified in 6 NYCRR Part 228.5(a), which verify the following:

    i. VOC content of all coatings used at the facility. This should be a certification from the coating supplier/manufacturer which verifies the parameters used to determine the VOC content.

    ii. Quantity of coatings, and other VOC containing materials, purchased and utilized at the facility.

16. The records specified in condition #15 must be submitted to the Department upon request.

17. Any exceedance of the limits in conditions #1, 2, 3, 4 or 5 must be reported to the Department, in writing, within thirty (30) days of the occurrence, to the Regional Air Pollution Control Engineer, NYSDEC, 317 Washington Street, Watertown, New York, 13601.

18. Representatives of the Department shall be permitted, during reasonable business hours, entrance to the facility to perform inspections, review emission records and obtain coating samples to confirm compliance with the above operating conditions.

N.Y.S. DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF AIR

SEQ NO: 6-C-0003
RUN DATE: 09/02/86

C 222601 0217 00001 W C
LOCATION FAC EP

CERTIFICATE TO OPERATE AN AIR CONTAMINATION SOURCE
STATIONARY COMBUSTION INSTALLATION UNIT

OWNER	FACILITY	
(1) JAMES RIVER CORP/PREMOID DIV	(6) JAMES RIVER CORP/PREMOID DIV	(11) CONFIDENTIAL STATUS NON-CONFIDNT
(2) BRIDGE ST	(7) BRIDGE ST	(12) APPLICATION STATUS IN COMPLIANC
(3) BROWNVILLE (4) NY	(8) BROWNVILLE (9) 13615	DATE OF LAST CHANGE 08/18/86
(5) 13515	(10) REP: GEORGE CUPERNALL	PRIOR CO ISSUE DATE
		PRIOR CO EXPIRATION DATE

EMISSION POINT 00001

(41)UTM-E: 421.3 KM. (42)STACK HEIGHT: 45 FT. (43)EXIT VELOCITY: 25.00 FT/SEC (44)SIC: 2631 (45)AGENCY-CODE-1:
(46)UTM-N: 872.3 KM. (47)HT ABV STRUC: 25 FT. (48)EXIT FLOW: 10600.00 ACFM (49)CO FEE: (50)AGENCY-CODE-2:
(51)GRND ELEV: 316 FT. (52)STK DIAM: 36 IN. (53)EXIT TEMP: 490 DEGR F (54)CO CONDITIONS: 1 3

(55)HEAT INPUT: 30.9 MILLIONS BTU/HR (56)CONTINUOUS MONITORS: (A)OPACITY

UNIT C

(57)TYPE: 001 PACKAGE BOILER (58)MFG: COMBUSTION ENGINEERING VP-9 (59)HEAT INPUT: 30.90 MILLIONS BTU/HR
(60)AIR INTAKE: 5 OTHER (61)SOURCE CODE: 7130 POWER GEN - MULTI
(62)BLDG: MAIN (63)FLOOR NAME: MAIN

BURNER DATA (64)TYPE: 052 STEAM ATOMIZED (65)MFG: PEABODY FLEXI-PAK M-18 (66)NO. OF BURNERS: 1

FUEL DATA (67)TYPE: 036 NO 6 OIL - VIRGIN FUEL QUANTITIES: (68)AVG/HR: 150.0 (69)MAX/HR: 206.0 (70)TOTAL/YEAR: 1080000
(71)FUEL SUPPLIER: ULTRAMAR PETROLEUM (72)HOURS/DAY: 24.0 (73)DAYS/YEAR: 300 (74)% OP BY SEASON: 30 25 20 2

CONTROL EQUIPMENT (86)TYPE: 099 NONE

AIR CONTAMINANTS	CAS NUMBER	EMISSIONS ACTUAL	EMISSIONS UNIT	EMISSIONS HOW DET	EMISSIONS PERMISSIBLE	% CONTROL EFFICIENCY	HRLY ACTUAL LBS/HOUR	ANNUAL EMISSIONS (LBS/YEAR) ACTUAL	ANNUAL EMISSIONS 10^x	ANNUAL EMISSIONS PERMISSIBLE
PARTICULATES	(098) NY075-00-0	(099) .200	(100) 11	(101) 05	(102) .200	(103)	(104) 20.600	(105) 44500	(106) 0	(107) 44500
SULFUR DIOXIDE	(108) 07446-09-5	(109) 2.090	(110) 11	(111) 05	(112) 2.090	(113)	(114) 64.700	(115) 466,000	(116) 3	(117) 466.000
OXIDES OF NITROGEN	(118) NY210-00-0	(119)	(120) 98	(121)	(122)	(123)	(124)	(125)	(126)	(127)

(15)PRIOR COMMENTS (16)BY (17)DATE	(18)CURRENT COMMENTS (19)BY ____ (20)DATE / /	(27)LAST INSPECTION DATE / /
1.	1.	(21)INSPECTION STATUS
2.	2.	(22)DATE OF NEXT ACTION / /
3.	3.	(23)ISSUE DATE 08/01/86
4.	4.	(24)EXPIRATION DATE 08/01/91
5.	5.	(25)CO FEE $50.00

FIRM REP'S SIGNATURE: DATE: ISSUING OFFICER'S SIGNATURE: DATE:

P Randall Vance 09-15-86

OP LOCATION FACILITY EMISSION POINT
4 2 2 2 6 0 1 0 2 1 7 0 0 0 0 2 1

A ADD
C CHANGE
D DELETE

READ INSTRUCTIONS CONTAINED IN FORM 78-11-12 BEFORE ANSWERING ANY QUESTION

NEW YORK STATE
DEPARTMENT OF ENVIRONMENTAL CONSERVATION

COPIES
WHITE - ORIGINAL
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WHITE - REGIONAL OFFICE
WHITE - FIELD REP
YELLOW - APPLICANT

PROCESS, EXHAUST OR VENTILATION SYSTEM

APPLICATION FOR PERMIT TO CONSTRUCT OR CERTIFICATE TO OPERATE

SECTION A

1 NAME OF OWNER/FIRM: James River Corporation Premoid Division
2 NUMBER AND STREET ADDRESS: Bridge Street
3 CITY - TOWN - VILLAGE: Brownville
4 STATE: NY
5 ZIP: 13615
6 OWNER CLASSIFICATION: A ☐ COMMERCIAL C ☐ UTILITY E ☐ STATE F ☐ MUNICIPAL H ☐ HOSPITAL I ☐ RESIDENTIAL B ☒ INDUSTRIAL D ☐ FEDERAL G ☐ EDUC INST J ☐ OTHER
7 NAME & TITLE OF OWNERS REPRESENTATIVE: George Cupernall, Chief Engineer
8 TELEPHONE: 782-5800
9 NAME OF AUTHORIZED AGENT
10 TELEPHONE
11 NUMBER AND STREET ADDRESS
12 CITY - TOWN - VILLAGE
13 STATE
14 ZIP
15 NAME OF P.E. OR ARCHITECT PREPARING APPLICATION
16 N.Y.S. P.E. OR ARCHITECT LICENSE NO.
17 TELEPHONE
18 SIGNATURE OF OWNERS REPRESENTATIVE OR AGENT WHEN APPLYING FOR A PERMIT TO CONSTRUCT
19 FACILITY NAME (IF DIFFERENT FROM OWNER/FIRM)
20 FACILITY LOCATION (NUMBER AND STREET ADDRESS)
21 CITY - TOWN - VILLAGE
22 ZIP
23 BUILDING NAME OR NUMBER: Coating Make-up Area
24 FLOOR NAME OR NUMBER: Main
25 START UP DATE: 9 / 80 (MO / YR)
26 DRAWING NUMBERS OF PLANS SUBMITTED
27 PERMIT TO CONSTRUCT: A ☐ NEW SOURCE B ☐ MODIFICATION
28 CERTIFICATE TO OPERATE: A ☐ NEW SOURCE C ☒ EXISTING SOURCE B ☐ MODIFICATION

SEC. B

29 EMISSION POINT ID	30 GROUND ELEVATION (FT)	31 HEIGHT ABOVE STRUCTURES (FT)	32 STACK HEIGHT (FT.)	33 INSIDE DIMENSIONS (IN.)	34 EXIT TEMP (°F)	35 EXIT VELOCITY (FT/SEC)	36 EXIT FLOW RATE (ACFM)	37 HRS/DAY	39 DAYS/YR	40 % OPERATION BY SEASON (Winter Spring Summer Fall)
0 0 2	316	11	29	12	70	54	2520	1	200	25 25 25 25

SEC. C

DESCRIBE PROCESS OR UNIT

41 1. Dust collector at top of Kady mill

SEC. D

42 EMISSION CONTROL EQUIPMENT I.D	43 CONTROL TYPE	44 MANUFACTURER'S NAME AND MODEL NUMBER	45 DISPOSAL METHOD	46 DATE INSTALLED MONTH / YEAR	47 USEFUL LIFE
48	49	50	51	52 /	53

SECTION E

CALCULATIONS

A filter made up of several layers of cheesecloth was placed over the stack during a full day when 5,900 lbs. of Kaolin clay and 200 lbs. of starch were processed in the Kady mill. Less than 40 grams of material was collected during the entire day. During the test it was noted that no sign of material passing through the filter could be seen.

SECTION F

54 CONTAMINANT NAME	CAS NUMBER	INPUT OR PRODUCTION	UNIT	EMISSIONS ACTUAL	UNIT	HOW DET.	% CONTROL EFFIC'CY	HOURLY EMISSIONS (LBS/HR) ERP	HOURLY EMISSIONS (LBS/HR) ACTUAL	ANNUAL EMISSIONS (LBS/YR) ACTUAL	ANNUAL EMISSIONS (LBS/YR) 10³
54 Kaolin Clay	55 VY075-00-0 1332587	56	57	58 .001 .1	60 2 7	61 6	63 0	64 .1	65 .1	66 20	67 0
69 Starch	70 VY075-00-0 0005259	71.	72.	74.	77 2 7	78 6	78.	79	80.	81.	82.
84	85	86.	87.	89.	90.	91.	93.	94.	95.	96.	97.
99	100	101.	102.	104.	105.	106.	108.	109	110	111.	112.
114	115	116.	117.	119.	120.	121.	123.	124	125.	126.	127.
129	130	131.	132.	134.	135.	136.	138.	139	140.	141.	142.

SEC. G

SOLID FUEL TYPE	SOLID FUEL TONS/YR	SOLID FUEL % S	OIL TYPE	OIL THOUSANDS OF GALLONS/YR	OIL % S	GAS TYPE	GAS THOUSANDS OF CF/YR	GAS BTU/CF
144	145	146	147	148	149	150	151	152

Upon completion of construction sign the statement listed below and forward to the appropriate field representative

THE PROCESS, EXHAUST OR VENTILATION SYSTEM HAS BEEN CONSTRUCTED AND WILL BE OPERATED IN ACCORDANCE WITH STATED SPECIFICATIONS AND IN CONFORMANCE WITH ALL PROVISIONS OF EXISTING REGULATIONS.

155 SIGNATURE OF AUTHORIZED REPRESENTATIVE OR AGENT: George Cupernall
DATE: 7/30/86

AGENCY USE ONLY

156 LOCATION CODE	157 FACILITY ID. NO.	158 U T M (E)	159 U T M (N)	160 SIC NUMBER	161 DATE APPL. RECEIVED	162 DATE APPL. REVIEWED	163 REVIEWED BY
2 2 2 6 0 1 0 2 1 7	4 2 1 3 8 7 2 3	2 6 3 1			/ /	/ /	

PERMIT TO CONSTRUCT

164 DATE ISSUED	165 EXPIRATION DATE	166 SIGNATURE OF APPROVAL	167 FEE
/ /	/ /		

1. DEVIATION FROM APPROVED APPLICATION SHALL VOID THIS PERMIT
2. THIS IS NOT A CERTIFICATE TO OPERATE
3. TESTS AND APPROVAL OF EMISSION CONTROL EQUIPMENT ARE REQUIRED PRIOR TO THE ISSUANCE OF A CERTIFICATE TO OPERATE

RECOMMENDED ACTION RE: C.O.

169 DATE ISSUED	170 EXPIRATION DATE	171 SIGNATURE OF APPROVAL	172 FEE
08/01/86	08/01/91		50.00

DATE
AS BUILT VS. PERMIT CHANGES INDICATED ON FORM
SOURCE AS BUILT
INITIALED

174 SPECIAL CONDITIONS:

1. NONE

N.Y.S. DEPARTMENT ENVIRONMENTAL CONSERVATION
DIVISION OF AIR

AC NO: 6-C-00(
RUN DATE: 09/02/8

C 222601 0217 00002 W I
LOCATION FAC EP

CERTIFICATE TO OPERATE AN AIR CONTAMINATION SOURCE
PROCESS, EXHAUST OR VENTILATION SYSTEM UNIT

OWNER	FACILITY	
(1) JAMES RIVER CORP/PREMOID DIV	(6) JAMES RIVER CORP/PREMOID DIV	(11) CONFIDENTIAL STATUS NON-CONFID
(2) BRIDGE ST	(7) BRIDGE ST	(12) APPLICATION STATUS IN COMPLIA
(3) BROWNVILLE (4) NY	(8) BROWNVILLE (9) 13615	DATE OF LAST CHANGE 08/18/86
(5) 13515	(10) REP: GEORGE CUPERNALL	PRIOR CO ISSUE DATE
		PRIOR CO EXPIRATION DATE

EMISSION POINT 00002
(41)UTM-E: KM. (42)STACK HEIGHT: 29 FT. (43)EXIT VELOCITY: 54.00 FT/SEC (44)SIC: 2631 (45)AGENCY-CODE-1:
(46)UTM-N: KM. (47)HT ABV STRUC: 11 FT. (48)EXIT FLOW: 2520.00 ACFM (49)CO FEE: (50)AGENCY-CODE-2:
(51)GRND ELEV: 316 FT. (52)STK DIAM: 12 IN. (53)EXIT TEMP: 70 DEGR F (54)CO CONDITIONS: 1 3 EDIT: REV. RE

UNIT I
(55)HOURS/DAY: 1.0 (56)DAYS/YEAR: 200 (57)% OP BY SEASON: 25 25 25 25 (58)SOURCE CODE: 2101 MIXING OR BLENDING -
(59)BLDG: COATING MAKE-UP AREA (60)FLOOR NAME: MAIN (61)RULE 1: 212.00 (62)RULE 2:

PROCESS/UNIT DESCRIPTION (72)DESCRIPTION 1. DUST COLLECTOR AT TOP OF KADY MILL

CONTROL EQUIPMENT (73)TYPE: 099 NONE

AIR CONTAMINANTS	CAS NUMBER	ENV RATING	EMISSIONS ACTUAL	EMISSIONS UNIT	EMISSIONS HOW DET	EMISSIONS PERMISSIBLE	% CONTROL EFFICIENCY	HRLY ACTUAL LBS/HOUR	ANNUAL EMISSIONS (LBS/YEAR) ACTUAL	ANNUAL EMISSIONS (LBS/YEAR) 10×	ANNUAL EMISSIONS (LBS/YEAR) PERMISS
PARTICULATES	(085) NY075-00-0	(086) C	(087) .001	(088) 20	(089) 06	(090) .050	(091)	(092) .100	(093) 20.000	(094) 0	(095)

(15)PRIOR COMMENTS (16)BY (17)DATE	(18)CURRENT COMMENTS (19)BY _____ (20)DATE __/__/__	
1.	1.	(27)LAST INSPECTION DATE __/__/__
2.	2.	(21)INSPECTION STATUS _____
3.	3.	(22)DATE OF NEXT ACTION __/__/__
4.	4.	(23)ISSUE DATE 08/01/86
5.	5.	(24)EXPIRATION DATE 08/01/91
		(25)CO FEE $50.00

FIRM REP'S SIGNATURE: DATE:

ISSUING OFFICER'S SIGNATURE: C R. L Vase DATE: 09-15-86

OP [A] LOCATION [2 2 2 6 0 1] FACILITY [0 2 1 7] EMISSION POINT [0 0 0 0 1] [C]

[A] ADD
[C] CHANGE
[D] DELETE

READ INSTRUCTIONS CONTAINED IN FORM 76-11-4 BEFORE ANSWERING ANY QUESTION

NEW YORK STATE
DEPARTMENT OF ENVIRONMENTAL CONSERVATION

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WHITE - REGIONAL OFFICE
WHITE - FIELD REP.
YELLOW - APPLICANT

STATIONARY COMBUSTION INSTALLATION

APPLICATION FOR PERMIT TO CONSTRUCT OR CERTIFICATE TO OPERATE 60-86-0389

SECTION A

1. NAME OF OWNER/FIRM: James River Corp./Premoid Div.
2. NUMBER AND STREET ADDRESS: Bridge Street
3. CITY - TOWN - VILLAGE: Brownville
4. STATE: NY
5. ZIP: 13615
6. OWNER CLASSIFICATION: A [ ] COMMERCIAL C [ ] UTILITY E [ ] STATE F [ ] MUNICIPAL H [ ] HOSPITAL I [ ] RESIDENTIAL B [X] INDUSTRIAL D [ ] FEDERAL G [ ] EDUC INST J [ ] OTHER
7. NAME & TITLE OF OWNERS REPRESENTATIVE: George Cupernall, Ch Eng
8. TELEPHONE: 782-5800
9. NAME OF AUTHORIZED AGENT
10. TELEPHONE
11. NUMBER AND STREET ADDRESS
12. CITY - TOWN - VILLAGE
13. STATE
14. ZIP
15. NAME OF P.E. OR ARCHITECT PREPARING PLANS
16. N.Y.S. P.E. OR ARCHITECT LICENSE NO.
17. TELEPHONE
18. SIGNATURE OF OWNERS REPRESENTATIVE OR AGENT WHEN APPLYING FOR A PERMIT TO CONSTRUCT
19. FACILITY NAME (IF DIFFERENT FROM OWNER/FIRM)
20. FACILITY LOCATION (NUMBER AND STREET ADDRESS)
21. CITY - TOWN - VILLAGE
22. ZIP
23. BUILDING NAME OR NUMBER
24. FLOOR NAME OR NUMBER: Main
25. START UP DATE MO/YR: /63
26. DRAWING NUMBERS OF PLANS SUBMITTED
27. PERMIT TO CONSTRUCT: A [ ] NEW SOURCE B [ ] MODIFICATION
28. CERTIFICATE TO OPERATE: A [ ] NEW SOURCE C [X] EXISTING B [ ] MODIFICATION

SECTION B

29. EMISSION POINT ID	30. GROUND ELEVATION (FT.)	31. HEIGHT ABOVE STRUCTURES (FT.)	32. STACK HEIGHT (FT.)	33. INSIDE DIMENSION(S) (IN.)	34. EXIT TEMPERATURE (°F)	35. EXIT VELOCITY (FT./SEC.)	36. EXIT FLOW (ACFM)	37. HEAT INPUT (MILLION BTU/HR)	38. CONTINUOUS MONITOR(S)
0 0 1	316	25	45	36	490	25	10,600	30,9	A [X] OPACITY B [ ] SULFUR DIOXIDE C [ ] NITROGEN OXIDES D [ ] OXYGEN E [ ] CARBON DIOXIDE F [ ] OTHER

SECTION C

39. UNIT TYPE	40. UNIT MANUFACTURER'S NAME AND MODEL NUMBER	41. UNIT HEAT INPUT	42. AIR INTAKE	43. SOURCE CODE
01	Combustion Engineering VP-9	30,9	5	7/30

44. BURNER TYPE	45. NO. OF BURNERS	46. BURNER MANUFACTURER'S NAME AND MODEL NUMBER	47. FUEL TYPE	48. AVG. QUANTITY OF FUEL/HR	49. MAX. QUANTITY OF FUEL/HR	50. QUANTITY OF FUEL/YR
52	1	Peabody Flexi-Pak M-18	36	150 GPH	206 GPH	1,080,000 GP

51. HRS/DAY	52. DAYS/YEAR	53. % OPERATION BY SEASON (Winter / Spring / Summer / Fall)	54. NAME OF SUPPLIER(S)
24	300	30 / 25 / 20 / 25	Ultramar Petroleum Inc., Massena, NY 13622

55. BURNER TYPE	56. NO. OF BURNERS	57. BURNER MANUFACTURER'S NAME AND MODEL NUMBER	58. FUEL TYPE	59. AVG. QUANTITY OF FUEL/HR	60. MAX. QUANTITY OF FUEL/HR	61. QUANTITY OF FUEL/YR

62. HRS/DAY	63. DAYS/YEAR	64. % OPERATION BY SEASON (Winter / Spring / Summer / Fall)	65. NAME OF SUPPLIER(S)

SECTION D

66. EMISSION CONTROL EQUIP I.D.	67. CONTROL TYPE	MANUFACTURER'S NAME AND MODEL NUMBER	DISPOSAL METHOD	DATE INSTALLED MO./YR.	USEFUL LIFE
66.	67. 99	68.	69.	70.	71.
72.	73.	74.	75.	76.	77.

SECTION E

CALCULATIONS

Max. Fuel Usage = 1650#/Hr.

$\frac{1650\#/HR.}{8\#/GAL.}$ = 206 GPH

206 GPH x 150,000 $\frac{BTU}{Gal.}$ = 30,900,000 BTU/HR.

SECTION F

TO BE COMPLETED FOR ALL SOURCES USING ITEM 27 AND OTHER SOURCES AS DEFINED IN THE INSTRUCTION FORM 76-11-4

CONTAMINANT NAME	CAS NUMBER	EMISSIONS ACTUAL	UNIT	HOW DET.	% CONTROL EFFICIENCY	HOURLY EMISSIONS (LBS/HR) ACTUAL	ANNUAL EMISSIONS (LBS/YR) ACTUAL	10³	PERMISS.
78. TOTAL PARTICULATES	79. NY075-00-0	80.	81.	82.	84. 0	85.	86.	87.	88.
89. SULFUR DIOXIDE	90. 7446-09-5	91.	92.	93.	95. 0	96.	97.	98.	99.
100. NITROGEN OXIDES	101. NY610-00-0	102.	103. 98	104.	106.	107.	108.	109.	110.
111.	112.	113.	114.	115.	117.	118.	119.	120.	121.
122.	123.	124.	125.	126.	128.	129.	130.	131.	132.

Upon completion of construction sign the statement listed below and forward to the appropriate field representative

THE STATIONARY COMBUSTION INSTALLATION HAS BEEN CONSTRUCTED AND WILL BE OPERATED IN ACCORDANCE WITH STATED SPECIFICATIONS AND IN CONFORMANCE WITH ALL PROVISIONS OF EXISTING REGULATIONS.

133. SIGNATURE OF AUTHORIZED REPRESENTATIVE OR AGENT: George Cupernall — DATE: 7/30/86

AGENCY USE ONLY

134. LOCATION CODE	135. FACILITY I.D. NO.	136. U.T.M. (E)	137. U.T.M. (N)	138. SIC NUMBER	139. DATE APPL. RECEIVED	140. DATE APPL. REVIEWED	141. REVIEWED BY:
2 2 2 6 0 1	0 2 1 7	4 2 1 3 8 7 2 3		2 6 3 1	/ /	/ /	

PERMIT TO CONSTRUCT

142. DATE ISSUED	143. EXPIRATION DATE	144. SIGNATURE OF APPROVAL	145. FEE
/ /	/ /		

1. DEVIATION FROM APPROVED CONSTRUCTION SHALL VOID THIS PERMIT
2. THIS IS NOT A CERTIFICATE TO OPERATE
3. TESTING FOR ADDITIONAL EMISSION CONTROL EQUIPMENT MAY BE REQUIRED PRIOR TO CERTIFICATE TO OPERATE

RECOMMENDED ACTION RE: C.O.

147. DATE ISSUED	148. EXPIRATION DATE	149. SIGNATURE OF APPROVAL	150. FEE
08/01/86	08/01/91		500

DATE

[ ] AS BUILT VS. PERMIT CHANGES INDICATED ON FORM
[ ] NEW SOURCE

DATE INITIALED

152. SPECIAL CONDITIONS:

1. None
2.
3.
4.
5.
6.
7.
8.

REXAM

BRIDGE STREET
BROWNVILLE NY 13615
USA
FAX 1 315 782 5416
TELEPHONE
1 315 782 5800

8 Dec 97

Mr. Chris LaLone
New York State Department of Environmental Conservation
Region 6
317 Washington St.
Watertown, NY 13601

Re: Title V Capping Plan
REXAM DSI
CONFIDENTIALITY

Dear Mr. LaLone,

Attached is REXAM DSI's Title V capping plan.

REXAM has identified several pages as CONFIDENTIAL, containing business sensitive information. These pages detail chemical usage, facility layout, process information, etc. REXAM believes this information is an advantage in a competitive world market and should therefore be considered confidential. As confidential, we expect this material to be excluded from public access and the Freedom of Information Act. We understand that you will contact us if you disagree with our designation of any material as confidential and that you will give us prior notice if you intend to disclose such information so that we may take appropriate actions to preserve it's confidential status.

Feel free to contact me for any assistance at 315-782-5800 Ext.12

Sincerely,

Steven M. Lange
Senior Process Engineer

VOC and HAP Emissions

Actual VOC and HAP annual emissions are significantly below Title V thresholds and these emissions were generated by only a few types of saturants and dyes. Therefore, restrictions on the annual usage of these materials can be established without affecting the operational flexibility of the process. Facility actual annual emissions, facility PTE and PTE with usage caps in place are presented in Tables 2 through 5. Tables 2, 3 and 4 present these emissions from coating, saturant and dye usages, respectively. A summary of facility VOC and HAP emissions, including those from combustion sources, is presented in Table 5. VOC and HAP content is based on MSDS information with 100 percent of the VOC or HAP assumed to be volatilized and emitted to atmosphere with no retainage in the product.

Monitoring, Recordkeeping, and Reporting

Boiler No. 2

The facility will monitor No. 6 fuel usage of Boiler No. 2 on a monthly basis. SO_2 emissions will be calculated using established EPA emissions factors and fuel analysis. Records of fuel usage and boiler emissions will be retained on file at the facility available for inspection for a period of at least five years. One year following the approval of the operating cap and annually thereafter, the facility will submit a report to NYSDEC summarizing annual fuel usage and resulting SO_2 emissions.

Papermachine Saturant and Dye Usage

Usages of dyes, saturants, and coatings will be recorded on a quarterly basis. VOC and HAP emissions will be calculated using mass balance procedures similar to those outlined in this capping plan. Similar to the Boiler No. 2 recordkeeping procedures, copies of these data will be retained on file at the facility for five years. These data will also be summarized annually and included in the above referenced annual report to NYSDEC.

Please feel free to contact me at (315) 782-5800 Ext. 12, or Dave Ostaszewski of Galson Consulting at (315) 432-0506, if you have any questions on this plan, or require any further information.

Sincerely,

Steven M. Lange
Senior Process Engineer.

Table 1
Summary of Boiler NOx and SO2 Potential Emissions
REXAM DSI
Brownville, New York

Emission Point IDs	Fuel Type	Capped Hours of Operation at Full Load (per year)	Capped Fuel Usage (per year)	Fuel Heating Values	Heat Input (MMBtu/yr)	Potential NOx Emission Rate (lb/MMBtu)	Potential NOx Annual Emissions (tons/yr)	Potential SO2 Emission Rate (lb/MMBtu)	Potential SO2 Annual Emissions (tons/yr)
30.9 MMBtu Boiler	No. 6 Fuel Oil	3,888	801 10^3 gal	150,000 Btu/gal	120,139	0.366	22.0	1.57	94.5
26 MMBtu Boiler	Natural Gas	8,760	223.3 $MMft^3$	1,020 Btu/ft^3	227,766	0.137	15.6	0.0006	0.066
5 MMBtu Coater Oven No. 1	Natural Gas	8,760	42.9 $MMft^3$	1,020 Btu/ft^3	43,758	0.098	2.15	0.0006	0.013
5 MMBtu Coater Oven No. 2	Natural Gas	8,760	42.9 $MMft^3$	1,020 Btu/ft^3	43,758	0.098	2.15	0.0006	0.013
2.1 MMBtu Marsden Dryer	Natural Gas	8,760	18 $MMft^3$	1,020 Btu/ft^3	18,360	0.100	0.92	0.0006	0.0053
						Potential NOx : Emissions	**42.8**	**Potential SO2: Emissions**	**94.6**

Notes:
1) NOx Emission Rates for Boilers:
No. 6 Fuel Oil - 55 $lb/10^3$ gal from AP-42, Volume I, April 1993, Section 1.3, External Industrial Combustion Boilers.
Natural Gas - 140 $lb/MMft^3$ from AP-42, Volume I, April 1993, Section 1.4, External Industrial Combustion Boilers.

2) Sulfur content in No. 6 fuel oil from fuel analysis is 1.5 percent.

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Table 2
Summary of Volatile Organic Compound and HAP Potential Emissions
REXAM DSI
Brownville, New York

Raw Material ID.	Actual Annual Usage (lb, wet)	Actual VOC Emissions (tons/yr)	Potential To Emit (if material used all year) (tons/yr)		Actual Total HAP Emissions (tons/yr)	Potential To Emit (if material used all year) (tons/yr)
Coatings						
[illegible]HS	694,567	2.08	12.61	Vinyl Acetate	1.04	6.30
				Formaldehyde	0.17	1.05
R225	9,705	0.02	10.50	Acrylonitrile	0.002	1.05
				Ethyl Acrylate	0.002	1.05
2671	1,183,374	0.50	1.79	Formaldehyde	0.30	1.05
				Acrylonitrile	0.02	0.06
2679	313,340	0.14	1.89	Formaldehyde	0.08	1.05
				Acrylonitrile	0.005	0.06
Total Actual Usage:	2,200,986	2.75		Total :	1.62	
Total Potential Usage:	4,200,000					

VOC Potential to Emit: 12.61 (tons/yr)
(Assuming Aimres was used exclusively)

Greatest Potential Individual HAP: 6.30 tons/yr (Vinyl Acetate)

Potential Total HAP: 7.35 tons/yr

Notes: - Annual usage based on actual use of raw materials from February 1996 to February 1997

Formulas

Actual Emissions (tons/year) = [Annual Usage (lb/yr) x Percent VOC or HAP (%)] / 2000 lbs/ton

Potential To Emit (tons/year) = (if material used all year) { Total Annual Usage (lb/yr) x Percent VOC or HAP $\frac{365 \text{ (days/yr)}}{\text{Days of Operation}}$ x [1 + (1 - $\frac{\text{percent of material usage}}{100}$)]}

Where: Days of Operation = 239
Dye Usage (percent) = 27%
Coating Usage (percent) = 75%

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Table 3
Summary of Volatile Organic Compound and HAP Potential Emissions
REXAM DSI
Brownville, New York

Raw Material ID.	Annual Usage (lb, wet)	Capped Annual Usage (lb,wet)	Actual VOC Emissions (tons/yr)	Potential To Emit (if material used all year) (tons/yr)	Potential To Emit (Based on Caps) (tons/yr)	Actual HAP Emissions (tons/yr)		Potential to Emit (if material used all year) (tons/yr)
Saturants								
[illegible]	23,022		0.03	4.71	4.71	Formaldehyde	0.01	2.35
						Acrylonitrile	0.01	2.35
						1,3-Butadiene	0.01	2.35
NS278	29,250		0.07	23.53	23.53	Styrene	0.004	1.41
						1,3-Butadiene	0.004	1.41
Amres	112,463	300,000	0.90	75.28	2.40	None	0.00	0.00
[illegible]	8,469		0.01	7.06	7.06	Formaldehyde	0.002	2.35
						Acrylonitrile	0.002	2.35
						1,3-Butadiene	0.002	2.35
26138	565,686		0.08	1.41	1.41	Acrylonitrile	0.01	0.12
						Formaldehyde	0.14	0.12
26736	5,422,945		2.17	3.76	3.76	Ethyl Acrylate	0.81	1.41
						Formaldehyde	1.36	2.35
	Total : 6,161,826		3.26			Total :	2.35	

VOC Potential to Emit: 75.28 (tons/yr)
(Assuming Amres was used exclusively)

VOC Potential to Emit (after capping): 25.18 (tons/yr)
(Assuming all capped material was used to the caps and NS278 is used the remainder of the year)

Potential Individual HAP: 2.35 tons/yr (Formaldehyde Acrylonitrile 1,3-Butadiene)

Potential Total HAP: 7.06 tons/yr

Notes: - Annual usage based on actual use of raw materials from February 1996 to February 1997

Formulas

Actual Emissions (tons/year) = [Annual Usage (lb/yr) x Percent VOC or HAP (%)] / 2000 lbs/ton

Potential To Emit (tons/year) = (if material used all year) [Total Annual Usage (lb/yr) x Percent VOC or HAP x $\frac{365 \text{ (days/yr)}}{\text{Actual Days of Operation}}$] / 2000 lbs/ton

Where: Days of Operation = 239

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Table 4
Summary of Volatile Organic Compound and HAP Potential Emissions
REXAM DSI
Brownville, New York

Raw Material ID.	Actual Annual Usage (lb, wet)	Capped Annual Usage (lb, wet)	Actual VOC Emissions (tons/yr)	Potential To Emit (if material used all year) (tons/yr)	Potential To Emit (Based on Caps) (tons/yr)	Actual HAP Emissions (tons/yr)		Potential To Emit (if material used all year) (tons/yr)	Potential To Emit (Based on Caps) (tons/yr)
Dyes									
Turapal PC Liquid	27.413		0.00	0.00	0.00	None	0.00	0.00	0.00
Pontamine Kraft Orange	9.510	20.000	0.57	56.69	1.20	None	0.00	0.00	0.00
Pontamine Yellow	1.606	20.000	0.07	42.51	0.90	None	0.00	0.00	0.00
Pontamine Black	11.115		0.17	14.17	14.17	None	0.00	0.00	0.00
Intrabond Red	19.263		0.21	10.39	10.39	None	0.00	0.00	0.00
Intracid Pure Blue L Paste	111		0.0003	2.36	2.36	None	0.00	0.00	0.00
BHD 6015 Blue	292		0.001	2.36	2.36	None	0.00	0.00	0.00
Intrabond Turquoise	2.528		0.01	3.78	3.78	None	0.00	0.00	0.00
Permablak	284.641	400.000	6.12	20.31	8.60	Ethylene Glycol	5.69	18.90	8.00
Carta Violet	1.199	10.000	0.23	198.40	2.10	Diethylene Glycol Monoethyl Ether	0.16	136.99	1.45
Total Actual Usage:	357.587		7.39			Total:	5.85		
Total Potential Usage:	945.000								

VOC Potential to Emit: 198.40 (tons/yr)
(Assuming Carta Violet was used exclusively)

VOC Potential to Emit (after capping): 13.54 (tons/yr)
(Assuming all capped material were used to the caps and Pontamine Black is used the remainder of the year)

Potential Individual HAP: 136.99 tons/yr (Diethylene Glycol - Monoethyl Ether)

Potential Total HAP: 136.99 tons/yr

Potential Individual HAP (after being capped): 8.00 tons/yr (Ethylene Glycol)

Potential Total HAP (after being capped): 9.45 tons/yr
(Assuming Carta Violet and Permablack are used to their caps)

Notes: - Annual usage based on actual use of raw materials from February 1996 to February 1997

Formulas

Actual Emissions (tons/year) = [Annual Usage (lb/yr) x Percent VOC or HAP (%)] / 2000 lbs/ton

Potential To Emit (tons/year) = (if material used all year)

$$[\text{Total Annual Usage (lb/yr)} \times \text{Percent VOC or HAP} \times \frac{365\ (\text{days/yr})}{\text{Days of Operation}} \times \left[1 + \left(1 - \frac{\text{percent of material usage}}{100}\right)\right]]$$

Where: Days of Operation = 239
Dye Usage (percent) = 27%
Coating Usage (percent) = 75%

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Table 5
Summary of Volatile Organic Compound and HAP Potential Emissions
REXAM DSI
Brownville, New York

Raw Material	VOC Emissions (tons/yr)		HAP Emissions (tons/yr)	
Coatings				
	Potential to Emit: (No Caps)	12.61	Potential Individual HAP:	6.30
			Potential Total HAP:	7.35
			(No Caps)	
Saturants				
	Potential to Emit	75.28	Potential Individual HAP:	2.35
	Potential to Emit (after capping)	9.98	Potential Total HAP:	7.06
			(No Caps)	
Dyes				
	Potential to Emit:	198.40	Potential Individual HAP:	136.99
			Potential Total HAP:	136.99
	Potential to Emit (after capping):	20.23	Potential Individual HAP (after being capped):	8.00
			Potential Total HAP (after being capped):	9.45
Facility Totals				
Paper Machine and Coaters				
	Actual VOC:	13.40	Actual Total HAP:	9.82
			Actual Individual HAP:	5.69
	Potential to Emit:	286.29	Potential Total HAP:	151.40
			Potential Individual HAP:	136.99
	Total Potential VOC (after capping):	**42.82**	Potential Total HAP (after capping):	**23.86**
			Potential Individual HAP (after capping):	**8.00**
Combustion Sources				
	Potential to Emit:	0.85	Potential Total HAP:	<0.5
			Potential Individual HAP:	<0.5
	Potential to Emit (after capping):	**0.71**	Potential Total HAP (after capping):	**<0.5**
			Potential Individual HAP (after capping):	**<0.5**
Facility Potential to Emit		**287.14**	**Facility Potential Total HAP**	**24.36**
Facility Potential to Emit after Capping		**43.53**	**Facility Potential Individual HAP**	**8.50**

Notes: - Annual usage based on actual use of raw materials from February 1996 to February 1997

Attachment No. 1

Facility Schematic

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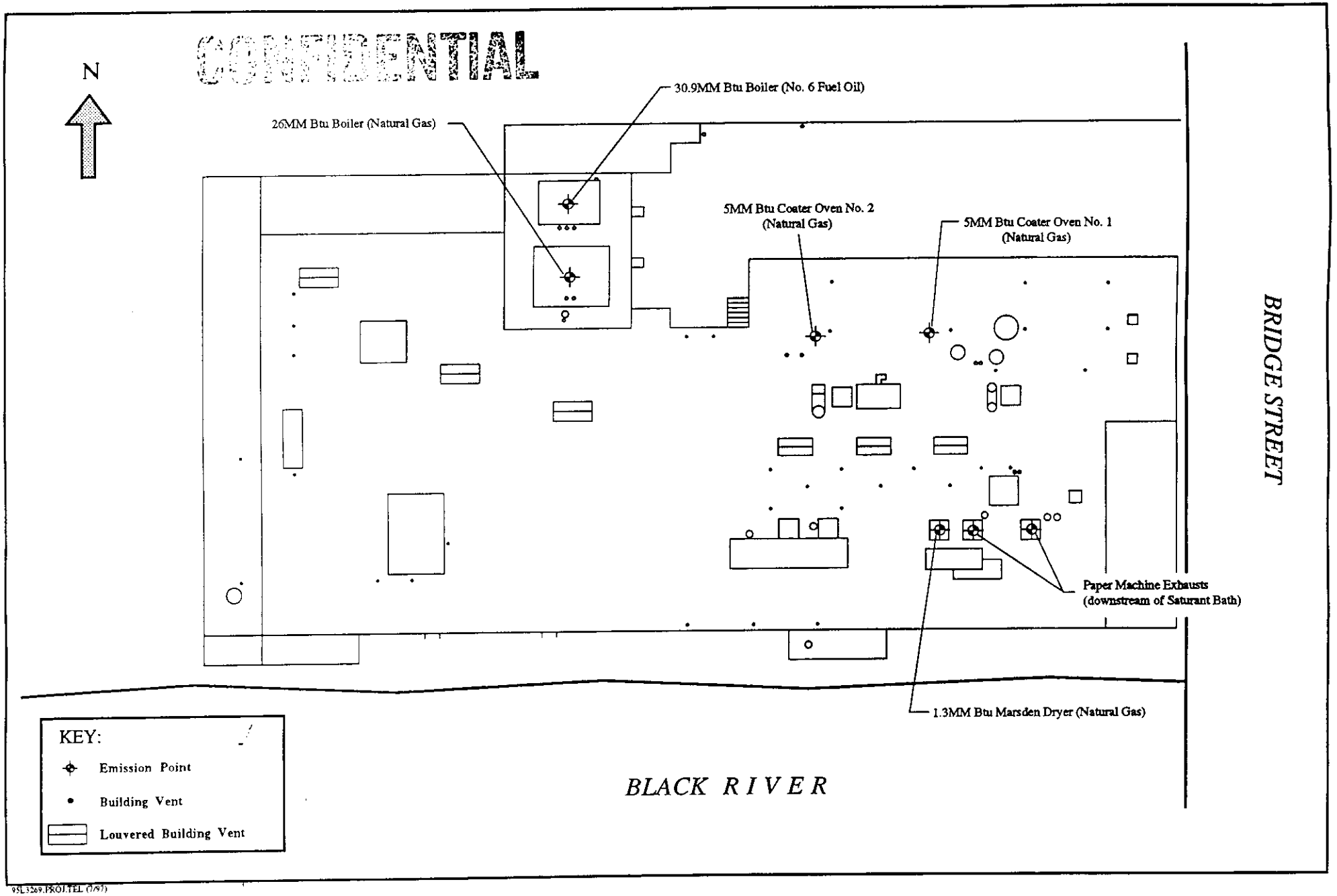

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REXAM DSI - Emission Point Location
Brownville, New York

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Attachment No. 2

Emission Calculations

Emission Calculations for EP00001
30.9MM BTU Boiler - No. 6 Fuel Oil
Decorative Specialties International, Inc., Brownville, New York

Source Information

Fuel:	No. 6 Fuel Oil
Heating Value:	150,000 Btu/gal of fuel oil
Heat Input:	30.9 MMBtu/hr
Max Firing Rate:	0.206 10^3 gal/hr
Max Hours of Operation:	3,888 hr/yr (24 hr/day, 162 days/yr)
Max Annual Fuel Usage:	800,928 gal/yr

No. 6 Fuel Oil Combustion Emissions

Particulates (PM):

AP-42[1] = 9.19S +3.22 lb/10^3 gal of fuel oil

AP-42[1] = 17.01 lb/10^3 gal of fuel oil (S=1.5%)

17.01 lb/10^3 gal	x	0.206 10^3 gal/hr	=	3.50 lb/hr
3.50 lb/hr	÷	30.9 MMBtu/hr	=	0.11 lb/MMBtu
3.50 lb/hr	x	3,888 hr/yr	=	13,608 lb/yr
13,608 lb/yr	÷	2,000 lb/ton	=	6.80 ton/yr

Sulfur Dioxide (SO2):

AP-42[1] = 157S lb/10^3 gal of fuel oil

AP-42[1] = 236 lb/10^3 gal of fuel oil (S=1.5%)

236 lb/10^3 gal	x	0.206 10^3 gal/hr	=	48.6 lb/hr
48.6 lb/hr	÷	30.9 MMBtu/hr	=	1.57 lb/MMBtu
48.6 lb/hr	x	3,888 hr/yr	=	188,957 lb/yr
188,957 lb/yr	÷	2,000 lb/ton	=	94.5 ton/yr

Nitrogen Oxides (NOx):

AP-42[1] = 55 lb/10^3 gal of fuel oil

55 lb/10^3 gal	x	0.206 10^3 gal/hr	=	11.3 lb/hr
11.3 lb/hr	÷	30.9 MMBtu/hr	=	0.366 lb/MMBtu
11.3 lb/hr	x	3,888 hr/yr	=	43,934 lb/yr
43,934 lb/yr	÷	2,000 lb/ton	=	22.0 ton/yr

Carbon Monoxide (CO):

AP-42[1] = 5 lb/10^3 gal of fuel oil

5 lb/10^3 gal	x	0.206 10^3 gal/hr	=	1.03 lb/hr
1.03 lb/hr	÷	30.9 MMBtu/hr	=	0.033 lb/MMBtu
1.03 lb/hr	x	3,888 hr/yr	=	4,005 lb/yr
4,005 lb/yr	÷	2,000 lb/ton	=	2.00 ton/yr

Total Organic Compounds (TOC):

AP-42[1] = 1.28 lb/10^3 gal of fuel oil

1.28 lb/10^3 gal	x	0.206 10^3 gal/hr	=	0.26 lb/hr
0.26 lb/hr	÷	30.9 MMBtu/hr	=	0.008 lb/MMBtu
0.26 lb/hr	x	3,888 hr/yr	=	1,011 lb/yr
1,011 lb/yr	÷	2,000 lb/ton	=	0.51 ton/yr

Non-methane Hydrocarbons (NMHC)

AP-42[1] = 0.28 lb/10^3 gal of fuel oil

0.28 lb/10^3 gal	x	0.206 10^3 gal/hr	=	0.058 lb/hr
0.058 lb/hr	÷	30.9 MMBtu/hr	=	0.0019 lb/MMBtu
0.058 lb/hr	x	3,888 hr/yr	=	226 lb/yr
226 lb/yr	÷	2,000 lb/ton	=	0.11 ton/yr

[1] Emission factors from AP-42, "Compilation of Air Pollutant Emission Factors", Vol. 1, April 1993, Section 1.3.

Emission Calculations for EP00003
26MM BTU Boiler - Natural Gas
Decorative Specialties International Inc., Brownville, New York

Source Information

Fuel:	Natural Gas
Heating Value:	1,020 Btu/ft³ of natural gas
Heat Input:	26 MMBtu/hr
Max Firing Rate:	0.0255 MMft³/hr
Max Hours of Operation:	8,760 hr/yr (24hr/day 365 days/yr)
Max Annual Fuel Usage:	223.4 MMft³/yr

Natural Gas Combustion Emissions

Particulates (PM):

			AP-42[1]	=	6.2 lb/MMft³ of natural gas
6.2 lb/MMft³	x	0.0255 MMft³/hr	=	0.16 lb/hr	
0.16 lb/hr	÷	26 MMBtu/hr	=	0.006 lb/MMBtu	
0.16 lb/hr	x	8,760 hr/yr	=	1,402 lb/yr	
1,402 lb/yr	÷	2,000 lb/ton	=	0.70 ton/yr	

Sulfur Dioxide (SO2):

			AP-42[1]	=	0.6 lb/MMft³ of natural gas
0.6 lb/MMft³	x	0.0255 MMft³/hr	=	0.015 lb/hr	
0.015 lb/hr	÷	26 MMBtu/hr	=	0.0006 lb/MMBtu	
0.015 lb/hr	x	8,760 hr/yr	=	131 lb/yr	
131 lb/yr	÷	2,000 lb/ton	=	0.066 ton/yr	

Nitrogen Oxides (NOx):

			AP-42[1]	=	140 lb/MMft³ of natural gas
140 lb/MMft³	x	0.0255 MMft³/hr	=	3.57 lb/hr	
3.57 lb/hr	÷	26 MMBtu/hr	=	0.137 lb/MMBtu	
3.57 lb/hr	x	8,760 hr/yr	=	31,273 lb/yr	
31,273 lb/yr	÷	2,000 lb/ton	=	15.6 ton/yr	

Carbon Monoxide (CO):

			AP-42[1]	=	35 lb/MMft³ of natural gas
35 lb/MMft³	x	0.0255 MMft³/hr	=	0.89 lb/hr	
0.89 lb/hr	÷	26 MMBtu/hr	=	0.034 lb/MMBtu	
0.89 lb/hr	x	8,760 hr/yr	=	7,796 lb/yr	
7,796 lb/yr	÷	2,000 lb/ton	=	3.90 ton/yr	

Total Organic Compounds (TOC):

			AP-42[1]	=	5.8 lb/MMft³ of natural gas
5.8 lb/MMft³	x	0.0255 MMft³/hr	=	0.15 lb/hr	
0.15 lb/hr	÷	26 MMBtu/hr	=	0.0058 lb/MMBtu	
0.15 lb/hr	x	8,760 hr/yr	=	1,314 lb/yr	
1,314 lb/yr	÷	2,000 lb/ton	=	0.66 ton/yr	

Non-methane Hydrocarbons (NMHC)

			AP-42[1]	=	48% of TOC
0.15 lb/hr	x	48 %	=	0.072 lb/hr	
0.072 lb/hr	÷	26 MMBtu/hr	=	0.003 lb/MMBtu	
0.072 lb/hr	x	8,760 hr/yr	=	631 lb/yr	
631 lb/yr	÷	2,000 lb/ton	=	0.32 ton/yr	

[1] Emission factors from AP-42, "Compilation of Air Pollutant Emission Factors", Vol. I, April 1993, Section 1.4

Emission Calculations for EP
5MM BTU Coater Oven No. 1 - Natural Gas
Decorative Specialties International Inc., Brownville, New York

Source Information

Fuel:	Natural Gas
Heating Value:	1,020 Btu/ft³ of natural gas
Heat Input:	5 MMBtu/hr
Max Firing Rate:	0.0049 MMft³/hr
Max Hours of Operation:	8,760 hr/yr (24hr/day, 7 days/ wk)
Max Annual Fuel Usage:	42.9 MMft³/yr

Natural Gas Combustion Emissions

Particulates (PM):

			AP-42[1]	=	4.5 lb/MMft³ of natural gas
4.5 lb/MMft³	x	0.0049 MMft³/hr	=	0.022 lb/hr	
0.022 lb/hr	÷	5 MMBtu/hr	=	0.0044 lb/MMBtu	
0.022 lb/hr	x	8,760 hr/yr	=	193 lb/yr	
193 lb/yr	÷	2,000 lb/ton	=	0.097 ton/yr	

Sulfur Dioxide (SO2):

			AP-42[1]	=	0.6 lb/MMft³ of natural gas
0.6 lb/MMft³	x	0.0049 MMft³/hr	=	0.0029 lb/hr	
0.0029 lb/hr	÷	5 MMBtu/hr	=	0.0006 lb/MMBtu	
0.0029 lb/hr	x	8,760 hr/yr	=	25.4 lb/yr	
25.4 lb/yr	÷	2,000 lb/ton	=	0.013 ton/yr	

Nitrogen Oxides (NOx):

			AP-42[1]	=	100 lb/MMft³ of natural gas
100 lb/MMft³	x	0.0049 MMft³/hr	=	0.49 lb/hr	
0.49 lb/hr	÷	5 MMBtu/hr	=	0.098 lb/MMBtu	
0.49 lb/hr	x	8,760 hr/yr	=	4,292 lb/yr	
4,292 lb/yr	÷	2,000 lb/ton	=	2.15 ton/yr	

Carbon Monoxide (CO):

			AP-42[1]	=	21 lb/MMft³ of natural gas
21 lb/MMft³	x	0.0049 MMft³/hr	=	0.10 lb/hr	
0.10 lb/hr	÷	5 MMBtu/hr	=	0.02 lb/MMBtu	
0.10 lb/hr	x	8,760 hr/yr	=	876 lb/yr	
876 lb/yr	÷	2,000 lb/ton	=	0.44 ton/yr	

Total Organic Compounds (TOC):

			AP-42[1]	=	8.0 lb/MMft³ of natural gas
8.0 lb/MMft³	x	0.0049 MMft³/hr	=	0.039 lb/hr	
0.039 lb/hr	÷	5 MMBtu/hr	=	0.0078 lb/MMBtu	
0.039 lb/hr	x	8,760 hr/yr	=	342 lb/yr	
342 lb/yr	÷	2,000 lb/ton	=	0.17 ton/yr	

Non-methane Hydrocarbons (NMHC)

			AP-42[1]	=	66% of TOC
0.04 lb/hr	x	66 %	=	0.026 lb/hr	
0.026 lb/hr	÷	5 MMBtu/hr	=	0.005 lb/MMBtu	
0.026 lb/hr	x	8,760 hr/yr	=	228 lb/yr	
228 lb/yr	÷	2,000 lb/ton	=	0.11 ton/yr	

[1] Emission factors from AP-42, "Compilation of Air Pollutant Emission Factors", Vol. I, April 1993, Section 1.4.

Emission Calculations for EP
5MM BTU Coater Oven No. 2 - Natural Gas
Decorative Specialties International Inc., Brownville, New York

Source Information

Fuel:	Natural Gas
Heating Value:	1,020 Btu/ft³ of natural gas
Heat Input:	5 MMBtu/hr
Max Firing Rate:	0.0049 MMft³/hr
Max Hours of Operation:	8,760 hr/yr (24hr/day, 7 days/ wk)
Max Annual Fuel Usage:	42.9 MMft³/yr

Natural Gas Combustion Emissions

Particulates (PM):

			AP-42[1]	=	4.5 lb/MMft³ of natural gas
4.5 lb/MMft³	x	0.0049 MMft³/hr	=	0.022 lb/hr	
0.022 lb/hr	÷	5 MMBtu/hr	=	0.0044 lb/MMBtu	
0.022 lb/hr	x	8,760 hr/yr	=	193 lb/yr	
193 lb/yr	÷	2,000 lb/ton	=	0.097 ton/yr	

Sulfur Dioxide (SO2):

			AP-42[1]	=	0.6 lb/MMft³ of natural gas
0.6 lb/MMft³	x	0.0049 MMft³/hr	=	0.0029 lb/hr	
0.0029 lb/hr	÷	5 MMBtu/hr	=	0.0006 lb/MMBtu	
0.0029 lb/hr	x	8,760 hr/yr	=	25.4 lb/yr	
25.4 lb/yr	÷	2,000 lb/ton	=	0.013 ton/yr	

Nitrogen Oxides (NOx):

			AP-42[1]	=	100 lb/MMft³ of natural gas
100 lb/MMft³	x	0.0049 MMft³/hr	=	0.49 lb/hr	
0.49 lb/hr	÷	5 MMBtu/hr	=	0.098 lb/MMBtu	
0.49 lb/hr	x	8,760 hr/yr	=	4,292 lb/yr	
4,292 lb/yr	÷	2,000 lb/ton	=	2.15 ton/yr	

Carbon Monoxide (CO):

			AP-42[1]	=	21 lb/MMft³ of natural gas
21 lb/MMft³	x	0.0049 MMft³/hr	=	0.10 lb/hr	
0.10 lb/hr	÷	5 MMBtu/hr	=	0.02 lb/MMBtu	
0.10 lb/hr	x	8,760 hr/yr	=	876 lb/yr	
876 lb/yr	÷	2,000 lb/ton	=	0.44 ton/yr	

Total Organic Compounds (TOC):

			AP-42[1]	=	8.0 lb/MMft³ of natural gas
8.0 lb/MMft³	x	0.0049 MMft³/hr	=	0.039 lb/hr	
0.039 lb/hr	÷	5 MMBtu/hr	=	0.0078 lb/MMBtu	
0.039 lb/hr	x	8,760 hr/yr	=	342 lb/yr	
342 lb/yr	÷	2,000 lb/ton	=	0.17 ton/yr	

Non-methane Hydrocarbons (NMHC)

			AP-42[1]	=	66% of TOC
0.04 lb/hr	x	66 %	=	0.026 lb/hr	
0.026 lb/hr	÷	5 MMBtu/hr	=	0.005 lb/MMBtu	
0.026 lb/hr	x	8,760 hr/yr	=	228 lb/yr	
228 lb/yr	÷	2,000 lb/ton	=	0.11 ton/yr	

[1] Emission factors from AP-42, "Compilation of Air Pollutant Emission Factors", Vol. 1, April 1993, Section 1.4.

Emission Calculations for EP
2.1 MM BTU Marsden Dryer - Natural Gas
Decorative Specialties International Inc., Brownville, New York

Source Information

Fuel: Natural Gas
Heating Value: 1,020 Btu/ft³ of natural gas
Heat Input: 2.1 MMBtu/hr
Max Firing Rate: 0.00206 MMft³/hr
Max Hours of Operation: 8,760 hr/yr (24hr/day, 7 days/ wk)
Max Annual Fuel Usage: 18.0 MMft³/yr

Natural Gas Combustion Emissions

Particulates (PM):

			AP-42[1]	=	4.5 lb/MMft³ of natural gas
4.5 lb/MMft³	x	0.00206 MMft³/hr	=	0.0093 lb/hr	
0.0093 lb/hr	÷	2.1 MMBtu/hr	=	0.0044 lb/MMBtu	
0.0093 lb/hr	x	8,760 hr/yr	=	81.5 lb/yr	
81.5 lb/yr	÷	2,000 lb/ton	=	0.041 ton/yr	

Sulfur Dioxide (SO2):

			AP-42[1]	=	0.6 lb/MMft³ of natural gas
0.6 lb/MMft³	x	0.00206 MMft³/hr	=	0.0012 lb/hr	
0.0012 lb/hr	÷	2.1 MMBtu/hr	=	0.0006 lb/MMBtu	
0.0012 lb/hr	x	8,760 hr/yr	=	10.51 lb/yr	
10.51 lb/yr	÷	2,000 lb/ton	=	0.0053 ton/yr	

Nitrogen Oxides (NOx):

			AP-42[1]	=	100 lb/MMft³ of natural gas
100 lb/MMft³	x	0.00206 MMft³/hr	=	0.21 lb/hr	
0.21 lb/hr	÷	2.1 MMBtu/hr	=	0.10 lb/MMBtu	
0.21 lb/hr	x	8,760 hr/yr	=	1,840 lb/yr	
1,840 lb/yr	÷	2,000 lb/ton	=	0.92 ton/yr	

Carbon Monoxide (CO):

			AP-42[1]	=	21 lb/MMft³ of natural gas
21 lb/MMft³	x	0.00206 MMft³/hr	=	0.043 lb/hr	
0.043 lb/hr	÷	2.1 MMBtu/hr	=	0.020 lb/MMBtu	
0.043 lb/hr	x	8,760 hr/yr	=	377 lb/yr	
377 lb/yr	÷	2,000 lb/ton	=	0.19 ton/yr	

Total Organic Compounds (TOC):

			AP-42[1]	=	8.0 lb/MMft³ of natural gas
8.0 lb/MMft³	x	0.00206 MMft³/hr	=	0.02 lb/hr	
0.02 lb/hr	÷	2.1 MMBtu/hr	=	0.0095 lb/MMBtu	
0.02 lb/hr	x	8,760 hr/yr	=	175.2 lb/yr	
175.2 lb/yr	÷	2,000 lb/ton	=	0.088 ton/yr	

Non-methane Hydrocarbons (NMHC)

			AP-42[1]	=	66% of TOC
0.02 lb/hr	x	66 %	=	0.013 lb/hr	
0.013 lb/hr	÷	2 MMBtu/hr	=	0.007 lb/MMBtu	
0.013 lb/hr	x	8,760 hr/yr	=	113.9 lb/yr	
113.9 lb/yr	÷	2,000 lb/ton	=	0.057 ton/yr	

[1] Emission factors from AP-42, "Compilation of Air Pollutant Emission Factors", Vol. 1, April 1993, Section 1.4.

REXAM

RECEIVED
FEB 16 2000
ENVIRONMENTAL QUALITY
REGION 6

BRIDGE STREET
BROWNVILLE NY 13615
USA
FAX 1 315 782 5416
TELEPHONE
1 315 782 5800

15 Feb 00

Mr. Chris LaLone
New York State Department of Environmental Conservation
Region 6
317 Washington St.
Watertown, NY 13601

Re: REXAM – Brownville
Annual Air State Facility Permit Report 1999
Permit #6-2226-00120/00009

Dear Mr. LaLone,

Attached are the reports required by our Air State Facility Permit. We have not exceeded the following limits.

VOC	50 Tons/ year
HAP(individual)	10 Tons/ year
HAP (total)	25 Tons/ year

All coatings used at Rexam – Brownville are compliant with 6 NYCRR 228.2 (b)(11), having less than 2.9 pounds VOC/ gallon.

Feel free to contact me for any assistance at 315-782-5800 Ext.12

Sincerely,

Steven M. Lange
Senior Process Engineer

Rexam - Brownville 1999 #6 Fuel Usage

	Gallons
Jan-99	92,380
Feb-99	96,240
Mar-99	120,878
Apr-99	99,652
May-99	87,060
Jun-99	0
Jul-99	0
Aug-99	0
Sep-99	0
Oct-99	0
Nov-99	86,850
Dec-99	86,357
Sum	**669,417**

Rexam-Brownville NY Raw Material HAPs

	Raw Material Usage												
Part #	1999 Usage	UOM	Formaldehyde		Ethyl Acrylate		vinyl acetate ether		Acrylonitrile		Eythelene Glycol		
			%	amount	%	amount	%	amount	%	amount	%	amount	
73004	1,938,429.0	PW	0.0600	1163.1	0.0250	484.6		0.0		0.0			
73042	663,670.8	PW		0.0	0.0300	199.1		0.0	0.0025	16.6			
73050	7,028,006.0	PW	0.0500	3514.0	0.0300	2108.4		0.0		0.0			
73070		PW		0.0		0.0		0.0		0.0			
73087		PW		0.0		0.0		0.0		0.0			
73091	11,750.0	PW	0.0200	2.4		0.0	0.3000	35.3		0.0			
73094	530,172.0	PW	0.0200	106.0		0.0	0.5000	2650.9		0.0			
73097	8,251.0	PW		0.0		0.0		0.0		0.0			
73098	9,640.0	PW		0.0		0.0		0.0		0.0			
73107	1,298,869.0	PW	0.0500	649.4	0.0400	519.5		0.0		0.0			
73111	43,200.0	PW	0.1000	43.2		0.0		0.0		0.0			
77193				0.0		0.0		0.0		0.0			
74142	557,352.0	PW	0.0113	63.0		0.0		0.0		0.0			
71150	468,215.2	PW									4.0000	18,728.6	
SUM (PW)	**12,557,555.0**			**5541.1**		**3311.7**		**2686.1**		**16.6**		**18,728.6**	**1999 Tons**
SUM Tons				**2.8**		**1.7**		**1.3**		**0.01**		**9.36**	**15.1**
			Many % are Worst Case Scenario										

Rexam - Brownville NY Coating VOC and HAPs 1999

	Coating Batches																									
	Coating	A	B	C	E	F	G	H	J	K	P	S	T	V	W	Y	X92	Yt	X10	X13	X13t	X17	X18	X19	X27	CLAY	
	Dec-99	4.0	22.6	15.3	35.6	18.2	4.1	0.0	22.0	23.5	1.9	0.0	0.0	0.0	0.0	5.6	10.9	0.0	0.0	0.0	2.0	0.0	0.0	0.5	0.0	16.3	
	Nov-99	7.0	15.6	17.6	24.1	11.0	7.9	2.0	15.0	12.2	4.0	2.0	0.0	0.5	0.5	4.4	9.3	0.0	0.0	1.5	4.0	0.0	0.0	1.5	1.0	12.9	
	Oct-99	7.0	31.0	18.0	46.9	24.6	9.3	2.0	20.6	25.3	6.8	2.0	3.0	1.0	1.0	5.8	14.7		0.0	0.0	0.5	3.0	0.0	11.0	2.0	19.0	
	Sep-99	10.3	22.1	18.5	50.5	27.4	9.4	0.0	11.8	15.2	0.0	0.0	0.0	1.0	1.0	5.1	30.3	0.0	0.0	3.0	0.0	1.0	0.0	0.0	0.0	22.5	
	Aug-99	2.2	18.0	19.0	2.1	0.8	3.3	4.0	11.6	19.1	0.5	4.0	0.5	0.5	0.3	4.4	3.5	2.5	0.0	0.5	0.0	3.0	3.2	0.0		6.7	
	Jul-99	7.0	30.9	19.0	48.9	33.4	2.2	0.0	15.9	20.9	0.0	0.0	0.0	0.0	0.0	5.8	23.5	4.5	3.0	2.8	0.0	34.0	31.8	4.0	0.0	20.8	
	Jun-99	7.0	30.0	18.5	19.1	11.1	5.0	0.0	12.5	15.0	0.5	0.0	2.5	1.5	1.8	3.7	9.5	1.6	2.0	0.0	0.0	36.0	38.0	0.0	1.0	11.3	
	May-99	2.0	20.8	15.3	34.1	20.3	7.7	0.0	1.0	4.8	0.0	0.0	0.0	0.5	0.0	2.9	13.1	0.0	0.0	5.3	0.0	39.0	44.0	0.0	0.0	12.7	
	Apr-99	9.5	33.3	27.0	36.2	21.8	4.6	4.3	4.9	12.0	0.0	3.0	0.0	1.0	2.0	6.1	19.5	2.5	0.0	7.0		41.0	50.8	1.0	0.0	18.1	
	Mar-99	8.0	28.4	22.1	20.9	14.3	4.2	0.0	5.6	14.5	1.0	1.0	1.0	1.3	1.0	6.9	12.3	1.0	5.0	0.0		33.8	37.8	0.0	0.0	14.4	
	Feb-99	6.5	25.5	19.9	30.1	15.0	4.8	1.3	6.2	9.4	0.0	0.0	1.3	0.8	1.0	4.7	15.4	0.5	0.0	0.0		31.3	36.5	0.0	0.0	10.9	
	Jan-99	4.5	26.4	16.0	23.6	15.0	1.8	4.5	4.0	8.5	0.9	7.0	0.8	0.0	0.0	3.5	12.6	1.5	0.3	0.0		41.2	53.4	0.0		0.0	
SUM	Batches	75.0	304.6	226.1	372.1	213.0	64.4	18.0	131.0	180.3	15.5	19.0	9.0	8.0	8.5	58.8	174.5	14.1	10.3	20.0	6.5	263.3	295.4	18.0	4.0	165.6	
Coating		A	B	C	E	F	G	H	J	K	P	S	T	V	W	Y	X92	Yt	X10	X13	X13t	X17	X18	X19	X27	CLAY	
VOC	lb/btch	1.33	2.02	1.35	0.1	4.09	4.06	0.0	8.91	5.35	1.03	0.06	1.1	8.39	5.6	8.11	3.56	8.11	1.3	1.5	1.5	1.1	0.9	1.2	1.2	0.52101	
HAP	lb/btch	0.85	0.48	1.35	0.1	2.19	2.16	0.0	0.63	0.38	0.84	0.04	0.57	0.57	0.32	0.55	2.81	0.55	1.3	1.4	1.4	1.0	0.9	1.2	1.2	0.52101	**1999Tons**
VOC	**1999 Tons**	0.050	0.307	0.152	0.018	0.435	0.131	0.000	0.584	0.482	0.008	0.001	0.005	0.034	0.024	0.238	0.311	0.057	0.007	0.015	0.005	0.139	0.134	0.011	0.002	0.043	**3.192**
HAP	**1999 Tons**	0.032	0.073	0.152	0.018	0.233	0.070	0.000	0.041	0.034	0.007	0.000	0.003	0.002	0.001	0.016	0.246	0.004	0.007	0.014	0.005	0.138	0.133	0.011	0.002	0.043	**1.285**

REXAM

REXAM DSI
BRIDGE STREET
BROWNVILLE NY 13615
USA
FAX 1 315 782 5416
TELEPHONE
1 315 782 5800

25 Aug 98

Mr. Chris LaLone
New York State Department of Environmental Conservation
Region 6
317 Washington St.
Watertown, NY 13601

Dear Mr. LaLone,

Attached is a spreadsheet that shows the calculated VOC for each of the production coatings made and used at Rexam - DSI in Brownville. All fall into the "Compliance Coating" category.

As mentioned in our capping plan, the usage of each coating will be recorded and reported annually.

Feel free to contact me for any assistance at 315-782-5800 Ext.12

Sincerely,

Steven M. Lange
Senior Process Engineer

CC: Norm Tomlinson
Bob Murphy

REXAM DSI
Brownville, NY

TABLE FOUR

ENVISION ENVIRONMENTAL
Date: 5/10/98
Revision: 6/24/98

BATCH COATING VOC CONTENT SUMMARY-COMPLIANCE BASIS

Part#	Batch Coating	(1) (VOC)a lbs/gal	(Dc)a lbs/gal	(Wv)a Fract	(Ww)a Fract	(We)a Fract	(Ve)a Fract	(Vw)a Fract	(2) VOC lbs/gal	(3) HAP lbs/gal
33001	CTG A (A-58)	**0.018**	11.82	0.4104	0.4098	0.00	0.00	0.58	0.0034	0.0022
33002	CTG B (A-50)	**0.032**	11.17	0.6498	0.6494	0.00	0.00	0.87	0.0042	0.0010
33003	CTG C (X90)	**0.019**	11.31	0.4628	0.4622	0.00	0.00	0.63	0.0030	0.0030
33004	CTG D (X92)	**0.020**	10.29	0.4445	0.4436	0.00	0.00	0.55	0.0090	0.0072
33005	CTG E	**0.004**	8.63	0.9048	0.9048	0.00	0.00	0.94	0.0003	0.0003
33006	CTG F (BC-14 Colors)	**0.028**	10.90	0.4064	0.4051	0.00	0.00	0.53	0.0088	0.0047
33007	CTG G (BC-14 Whites)	**0.028**	10.90	0.4064	0.4052	0.00	0.00	0.53	0.0088	0.0046
33008	CTG H (X67)	**0.000**	8.34	0.9991	0.9991	0.00	0.00	1.00	0.0000	0.0000
33010	CTG J	**0.041**	12.88	0.3480	0.3465	0.00	0.00	0.54	0.0190	0.0014
33011	CTG K	**0.044**	12.07	0.3925	0.3909	0.00	0.00	0.57	0.0140	0.0010
33016	CTG P-	**0.033**	8.50	0.8033	0.8026	0.00	0.00	0.82	0.0061	0.0050
33019	CTG S (K5)	**0.003**	9.11	0.6186	0.6185	0.00	0.00	0.68	0.0011	0.0008
33020	CTG T (X42)	**0.018**	13.15	0.3341	0.3335	0.00	0.00	0.53	0.0058	0.0030
33022	CTG V	**0.047**	12.53	0.3562	0.3544	0.00	0.00	0.53	0.0185	0.0013
33023	CTG W	**0.045**	12.02	0.3933	0.3917	0.00	0.00	0.56	0.0145	0.0008
33025	CTG Y	**0.043**	12.76	0.3818	0.3804	0.00	0.00	0.58	0.0181	0.0012
33026	CTG Z	**0.046**	11.93	0.4024	0.4007	0.00	0.00	0.57	0.0144	0.0009
33164	Clay Slurry 62% Solids	**0.005**	13.38	0.3714	0.3712	0.00	0.00	0.60	0.0020	0.0020
33046	CTG X6	**0.035**	11.62	0.3593	0.3577	0.00	0.00	0.50	0.0176	0.0129

Notes:

1) Compliance value, lbs VOC/gal coating, less water & exempt solvents. Used for judging regulatory compliance
   Coating VOC content compliance level for Paper Coating Operations is 2.9 lbs VOC/gal
   coating less water & exempt solvents, as 6 NYCRR 228.7, Table One.
2) Actual value, lbs VOC/gal coating as applied. Can be used for calculating VOC emissions on a gallon basis
3) Actual value, lbs HAP/gal coating as applied. Can be used for calculating HAP emissions on a gallon basis.

$$(VOC)a = \frac{(Dc)a \times [(Wv)a - (Ww)a - (We)a]}{1 - [(Vw)a + (Ve)a]}$$

as per 6 NYCRR 228.2(b)(11)

$$(VOC)a = \frac{(Dc)a\ ((Wv)a - (Ww)a - (We)a)}{1 - ((Vw)a + (Ve)a)}$$

where:

(VOC)a = VOC content of "as applied" coating, expressed as a mass of VOC, in pounds, per volume of coating, in gallons, minus water and excluded VOC

(Dc)a = coating density as applied, in pounds per gallon

(Wv)a = the weight fraction of total volatiles in the coating, as applied

(Ww)a = the weight fraction of water in the coating, as applied

(We)a = the weight fraction of excluded VOC in the coating, as applied

(Ve)a = the volume fraction of excluded VOC in the coating, as applied

(Vw)a= the volume fraction of water in the coating, as applied.

			Formaldyhyde		Ethyl Acrylate		vinyl acetate ether		Acrylonitrile					
			%	amount	%	amount	%	amount	%	amount	% solid	#solid	# liquid	Volume
33003 CTG C (X90)		11.5												
78000 WATER (120 GA)	1000.8	PW		0.00		0.00		0.00		0.00	0.0	0.0	1000.8	120.0
77203 TAMOL 850	14.4	PW		0.00		0.00		0.00		0.00	0.3	4.3	10.1	
77206 WITCO 3056A DEFOAMER	7.4	PW		0.00		0.00		0.00		0.00	0.3	2.2	5.2	
77145 RPS VANTAGE TI02	640.0	PW		0.00		0.00		0.00		0.00	0.7	467.2	172.8	
77187 ULTRA WHITE 90	700.0	PD		0.00		0.00		0.00		0.00	1.0	700.0	0.0	
77189 ANSILEX 93	600.0	PD		0.00		0.00		0.00		0.00	1.0	600.0	0.0	
77204 SYLOID W 500	176.0	PW		0.00		0.00		0.00		0.00	0.5	79.2	96.8	
77001 AQUA AMMONIA	4.5	PW		0.00		0.00		0.00		0.00	0.3	1.4	3.2	
73107 2679.0	1490.0	PW	0.05	0.75	0.04	0.60		0.00		0.00	0.5	730.1	759.9	
77193 ROPAQUE HP-91 (7-1066)	360.0	PW		0.00		0.00		0.00		0.00	0.3	0.0	261.0	
77141 BUBBLEBREAKER 748 DEFO/	4.6	PW		0.00		0.00		0.00		0.00	0.3	1.4	3.2	
SUM	**4997.7**	**0.0**	**0.05**	**0.75**	**0.04**	**0.60**	**0.00**	**0.00**	**0.00**	**0.00**		**2585.8**	**2312.9**	
33005 CTG E		8.7		0.00		0.00		0.00		0.00		0.0	0.0	
78000 WATER	2852.3	PW		0.00		0.00		0.00		0.00	0.0	0.0	2852.3	342.0
77104 FOAMMASTER NXZ	0.2	PW		0.00		0.00		0.00		0.00	0.3	0.1	0.1	
77056 PENFORD GUM 280	300.0	PD		0.00		0.00		0.00		0.00	1.0	285.0	15.0	
SUM	**3152.5**	**0.0**	**0.00**	**0.0**	**0.0**	**0.0**	**0.0**	**0.0**	**0.0**	**0.0**	**1.3**	**285.1**	**2867.4**	
33002 CTG B (A-50)		11.9												
78000 WATER	2185.1	PW		0.00		0.00		0.00		0.00	0.0	0.0	2185.1	262.0
77126 TSPP	2.5	PD		0.00		0.00		0.00		0.00	1.0	2.5	0.0	
77104 FOAMMASTER NXZ	1.0	PW		0.00		0.00		0.00		0.00	0.3	0.3	0.7	
77156 TINOPAL CBS-X	2.3	PD		0.00		0.00		0.00		0.00	1.0	2.3	0.0	
77084 ULTRA GLOSS 90	2200.0	PD		0.00		0.00		0.00		0.00	1.0	2200.0	0.0	
77001 AQUA AMMONIA	6.3	PW		0.00		0.00		0.00		0.00	0.1	0.6	5.7	
73004 2671.0	1000.0	PW	0.05	0.50	0.03	0.25		0.00		0.00	0.5	535.0	465.0	
71164 BHD 6015 BLUE	0.1	PW		0.00		0.00		0.00		0.00	0.3	0.0	0.1	
SUM	**5397.3**	**0.0**	**0.05**	**0.5**	**0.0**	**0.3**	**0.0**	**0.0**	**0.0**	**0.0**	**4.2**	**2740.8**	**2656.6**	
33006 CTG F (BC-14 COLORS)		10.1		0.00		0.00		0.00		0.00				
78000 WATER	1000.8	PW		0.00		0.00		0.00		0.00	0.0	0.0	1000.8	120.0
77126 TSPP	2.8	PD		0.00		0.00		0.00		0.00	1.0	2.8	0.0	
77104 FOAMMASTER NXZ	4.7	PW		0.00		0.00		0.00		0.00	0.3	1.4	3.3	
77185 HT CLAY	1800.0	PD		0.00		0.00		0.00		0.00	1.0	1800.0	0.0	
73004 2671.0	2240.0	PW	0.05	1.12	0.03	0.56		0.00		0.00	0.5	1198.4	1041.6	
77001 AQUA AMMONIA	8.3	PW		0.00		0.00		0.00		0.00	0.1	0.8	7.5	
SUM	**5056.5**	**0.0**	**0.05**	**1.1**	**0.0**	**0.6**	**0.0**	**0.0**	**0.0**	**0.0**	**2.9**	**3003.4**	**2053.1**	
33011 CTG K		10.9												
78000 WATER	925.7	PW		0.00		0.00		0.00		0.00	0.0	0.0	925.7	111.0
77197 CALGON T	1.5	PD		0.00		0.00		0.00		0.00	1.0	1.5	0.0	

77194 FOAMASTER VF	3.2	PD		0.00		0.00		0.00		0.00	0.3	1.0	2.2	
71118 TINOPAL PT LIQUID	18.4	PW		0.00		0.00		0.00		0.00	0.3	5.5	12.9	
77930 CALCIUM CARBONATE COVE	250.0	PW		0.00		0.00		0.00		0.00		0.0	250.0	
77207 TACKIDEX 332F	10.0	PD		0.00		0.00		0.00		0.00	1.0	10.0	0.0	
77189 ANSILEX 93	400.0	PD		0.00		0.00		0.00		0.00	1.0	400.0	0.0	
77187 ULTRA WHITE 90	1650.0	PD		0.00		0.00		0.00		0.00	1.0	1650.0	0.0	
74201 METSOL DT3H	3.0	PD		0.00		0.00		0.00		0.00	1.0	3.0	0.0	
73094 AIRFLEX 100HS	940.0	PW	0.02	0.19		0.00	0.05	0.47		0.00	0.6	517.0	423.0	
73004 2671.0	70.0	PW	0.05	0.04	0.03	0.02		0.00		0.00	0.5	37.5	32.6	
77193 ROPAQUE HP-91 (7-1066)	298.0	PW		0.00		0.00		0.00		0.00	0.3	82.0	216.1	
77173 POLY-EM 40	30.0	PW		0.00		0.00		0.00		0.00	0.4	12.0	18.0	
77001 AQUA AMMONIA	5.3	PW		0.00		0.00		0.00		0.00	0.1	0.5	4.7	
SUM	**4605.1**	**0.0**	**0.07**	**0.2**	**0.0**	**0.0**	**0.1**	**0.5**	**0.0**	**0.0**	**7.5**	**2719.9**	**1885.2**	**111.0**

REXAM - DSI Brownville, NY

Coating C
Batch size: 435 Gallons
Density: 11.5 #/Gal

Raw Material			Formaldehyde		Ethyl Acrylate					Gallons
			%	pounds	%	pounds				
Part Number	#/Batch	Units					% solid	#solid	# liquid	liquid
78000	1000.8	PW		0.00		0.00	0.00	0.000	1000.800	120.0
77203	14.4	PW		0.00		0.00	0.30	4.320	10.080	1.2
77206	7.4	PW		0.00		0.00	0.30	2.220	5.180	0.6
77145	640.0	PW		0.00		0.00	0.73	467.200	172.800	20.7
77187	700.0	PD		0.00		0.00	1.00	700.000	0.000	0.0
77189	600.0	PD		0.00		0.00	1.00	600.000	0.000	0.0
77204	176.0	PW		0.00		0.00	0.45	79.200	96.800	11.6
77001	4.5	PW		0.00		0.00	0.30	1.350	3.150	0.4
73107	1490.0	PW	0.05	0.75	0.04	0.60	0.49	730.100	759.900	91.1
77193	360.0	PW		0.00		0.00	0.28	99.000	261.000	31.3
77141	4.6	PW		0.00		0.00	0.30	1.380	3.220	0.4
SUM	**4997.7**			**0.75**		**0.60**		**2684.770**	**2312.930**	**277.3**
Weight Fraction				**0.00015**		**0.00012**		**0.537**	**0.463**	
Volume Fraction										**0.638**

$$(VOC)a = \frac{(Dc)a\,((Wv)a - (Ww)a - (We)a)}{1 - ((Vw)a + (Ve)a)}$$

where:

(VOC)a = VOC content of "as applied" coating, expressed as a mass of VOC, in pounds, per volume of coating, in gallons, minus water and excluded VOC

11.5 (Dc)a = coating density as applied, in pounds per gallon

0.4628 (Wv)a = the weight fraction of total volatiles in the coating, as applied

0.4625 (Ww)a = the weight fraction of water in the coating, as applied

0.0000 (We)a = the weight fraction of excluded VOC in the coating, as applied

0.0000 (Ve)a = the volume fraction of excluded VOC in the coating, as applied

0.6380 (Vw)a= the volume fraction of water in the coating, as applied.

$$(VOC)a = \frac{11.5\,(0.4628 - 0.4625 - 0)}{1 - (0.638 + 0)}$$

(VOC)a = 0.00950

REXAM DSI
BROWNVILLE, NY

TABLE ONE

RAW MATERIAL CHARACTERISTICS

ENVISION ENVIRONMENTAL
Date: 5/10/98
Revision: Draft

Part #	Part Description	SG	State	Density lbs/gal	Volatile % wt	Solids % wt	Water % wt	Total VOC % wt	non-HAP VOC % wt	Total HAP % wt	Formaldehyde % wt	Ethyl Acrylate % wt	Vinyl Acetate % wt	Acrylonitrile % wt	Ammonia % wt
71118	TINOPAL PT LIQUID	***1.20***	Liquid	10.01	79.00	21.00	79.00	0.0	***0.00***	0.00					
71164	BHD 6015 BLUE	1.30	Liquid	10.84	70.00	***30.00***	69.50	0.5	0.50	0.00					
73004	2671 Emulsion	1.05	Liquid	8.76	46.59	53.50	46.50	0.1		0.09	0.06	0.03			
73042	26138 (XPE-138)	1.05	Liquid	8.76	50.00	50.00	49.97	0.0		0.0325		0.0300		0.0025	
73094	AIRFLEX 100HS	1.04	Liquid	8.67	55.52	44.48	55.00	0.5		0.5200	0.0200		0.5000		
73097	RHOPLEX R-225 (6-4225)	1.10	Liquid	9.17	62.00	38.00	62.00	0.0		0.00					
73098	TYLAC 68159-00	1.00	Liquid	8.34	56.00	44.00	56.00	0.0		0.00					
73107	2679 Emulsion	1.05	Liquid	8.76	51.00	49.00	50.91	0.1		0.09	0.05	0.04			
74201	METSOL DT3H	1.30	Liquid	10.84	***2.00***	98.00	***0.00***	2.0	***2.00***						25.00
77001	AQUA AMMONIA	***1.00***	Liquid	8.34	100.00	0.00	75.00	0.0		0.00					
77056	PENFORD GUM 280	1.55	Solid	12.93	0.00	100.00	0.00	0.0		0.00					
77084	ULTRA GLOSS 90	2.50	Solid	20.85	0.00	100.00	0.00	0.0		0.00					
77104	FOAMMASTER NXZ	0.91	Liquid	7.59	46.91	53.09	***0.00***	46.9	46.91	0.00					
77126	TSPP	0.90	Solid	7.51	0.00	100.00		0.0		0.00					
77141	Bubble Breaker748 Defoamer	0.88	Liquid	7.34	0.00	***100.00***	0.00	0.0		0.00					
77144	TITINT WHITE R	2.50	Solid	20.85	29.00	71.00	29.00	0.0		0.00					
77145	RPS VANTAGE TI02	***2.10***	Liquid	17.51	28.00	72.00	28.00	0.0		0.00					
77156	TINOPAL CBS-X	***2.50***	Solid	20.85				0.0		0.00					
77173	POLY-EM 40	0.97	Liquid	8.09	60.07	39.93	60.00	0.1		0.07	0.07				
77185	HT CLAY	2.50	Solid	20.85	0.00	100.00	0.00	0.0		0.00					
77187	ULTRA WHITE 90	2.50	Solid	20.85	0.00	100.00	0.00	0.0		0.00					
77189	ANSILEX 93	***2.50***	Solid	20.85	0.00	100.00	0.00	0.0		0.00					0.20
77193	ROPAQUE HP-91 (7-1066)	1.10	Liquid	9.17	72.70	27.30	72.50	0.0		0.00					
77194	FOAMASTER VF	0.92	Liquid	7.67	10.00	90.00	0.00	10.0	10.00	0.00					
77197	CALGON T	***2.50***	Solid	20.85	0.00	100.00	0.00	0.00	0.00	0.00					
77201	DISPEX N40	1.20	Liquid	10.01	***50.00***	***50.00***	***50.00***	***0.00***	0.00	0.00					
77203	TAMOL 850	1.10	Liquid	9.17	70.05	29.95	70.00	0.1		0.05	0.05				
77204	SYLOID W 500	2.10	Solid	17.51	55.00	45.00	55.00	0.0		0.00					
77206	WITCO 3056A DEFOAMER	0.89	Liquid	7.42	0.00	***100.00***	0.00	0.0		0.00					
77207	TACKIDEX 332F	***2.50***	Solid	20.85	0.00	100.00	0.00	0.0		0.00					
77212	SYLOID 620	2.10	Solid	17.51	55.00	45.00	55.00	0.0		0.00					
77929	CALCIUM CARBONATE H-90	1.88	Liquid	15.68	29.00	71.00	29.00	0.0		0.00					
77930	Calcium Carbonate Covercarb	1.88	Liquid	15.68	29.00	71.00	29.00	0.0		0.00					
78000	Water	1.00	Liquid	8.34	100.00	0.00	100.00	0.0		0.00					

REXAM DSI
Brownville, NY

TABLE TWO-1

BATCH COATING MATERIAL CHARACTERISTICS

ENVISION ENVIRONMENTAL
Date: 5/10/98
Revision: Draft

Part #	Raw Material Name	State	Quantity gal	Quantity lbs	Density lbs/gal	Volatile lb/btch	Solids lb/btch	Water lb/btch	VOC lb/btch	Total HAP lb/btch	Formaldehyde lb/btch	Ethyl Acrylate lb/btch	Vinyl Acetate lb/btch	Acrylonitrile lb/btch	Ammonia lb/btch
33001	CTG A (A-58)														
78000	WATER	Liquid	172.00	1434.5	8.34	1434.48	0.00	1434.48	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77126	TSPP	Solid	0.33	2.5	7.51	0.00	2.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77104	FOAMMASTER NXZ	Liquid	0.13	1.0	7.59	0.48	0.54	0.00	0.48	0.00	0.00	0.00	0.00	0.00	0.00
77156	TINOPAL CBS-X	Solid	0.11	2.3	20.85	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77084	ULTRA GLOSS 90	Solid	105.52	2200.0	20.85	0.00	2200.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.58
77001	AQUA AMMONIA	Liquid	0.76	6.3	8.34	6.32	0.00	4.74	0.00	0.00	0.00	0.00	0.00	0.00	0.00
73004	2671	Liquid	114.19	1000.0	8.76	465.85	535.00	465.00	0.85	0.85	0.60	0.25	0.00	0.00	0.00
71164	BHD 6015 BLUE	Liquid	0.01	0.07	10.84	0.05	0.02	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Batch Total		**393.05**	**4646.70**	**11.82**	**1907.18**	**2738.06**	**1904.27**	**1.33**	**0.85**	**0.60**	**0.25**	**0.00**	**0.00**	**1.58**
33002	CTG B (A-50)														
78000	WATER	Liquid	262.00	2185.08	8.34	2185.08	0.00	2185.08	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77126	TSPP	Solid	0.33	2.50	7.51	0.00	2.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77104	FOAMMASTER NXZ	Liquid	0.13	1.02	7.59	0.48	0.54	0.00	0.48	0.48	0.00	0.00	0.00	0.00	0.00
77156	TINOPAL CBS-X	Solid	0.11	2.31	20.85	0.00	2.31	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77084	ULTRA GLOSS 90	Solid	105.52	2200.00	20.85	1321.54	878.46	1320.00	1.54	0.00	1.54	1.54	0.00	0.00	0.00
77001	AQUA AMMONIA	Liquid	0.76	6.32	8.34	0.00	6.32	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
73004	2671	Liquid	114.19	1000.00	8.76	0.00	1000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
71164	BHD 6015 BLUE	Liquid	0.01	0.07	10.84	0.05	0.02	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Batch Total		**483.05**	**5397.30**	**11.17**	**3507.15**	**1890.15**	**3505.13**	**2.02**	**0.48**	**1.54**	**1.54**	**0.00**	**0.00**	**0.00**
33003	CTG C (X90)														
78000	WATER	Liquid	120.00	1000.80	8.34	1000.80	0.00	1000.80	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77203	TAMOL 850	Liquid	1.57	14.40	9.17	10.09	4.31	10.08	0.01	0.01	0.01	0.00	0.00	0.00	0.00
77206	Witco 3056A Defoamer	Liquid	1.00	7.40	7.42	0.00	7.40	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77145	RPS VANTAGE TI02	Liquid	36.54	640.00	17.51	179.20	460.80	179.20	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77187	ULTRA WHITE 90	Solid	33.57	700.00	20.85	0.00	700.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77189	ANSILEX 93	Solid	28.78	600.00	20.85	0.00	600.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77204	SYLOID W 500	Solid	10.05	176.00	17.51	96.80	79.20	96.80	0.00	0.00	0.00	0.00	0.00	0.00	1.13
77001	AQUA AMMONIA	Liquid	0.54	4.50	8.34	4.50	0.00	3.38	0.00	0.00	0.00	0.00	0.00	0.00	0.00
73107	2679	Liquid	170.15	1490.00	8.76	759.90	730.10	758.56	1.34	1.34	0.75	0.60	0.00	0.00	0.72
77193	ROPAQUE HP-91 (7-1066)	Liquid	39.24	360.00	9.17	261.72	98.28	261.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77141	Bubble Breaker 748 Defoamer	Liquid	0.63	4.6	7.34	0.00	4.60	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Batch Total		**442.07**	**4997.70**	**11.31**	**2313.01**	**2684.69**	**2309.81**	**1.35**	**1.35**	**0.75**	**0.60**	**0.00**	**0.00**	**1.85**

REXAM DSI
Brownville, NY

TABLE TWO-2

BATCH COATING MATERIAL CHARACTERISTICS

ENVISION ENVIRONMENTAL
Date: 5/10/98
Revision: Draft

Part #	Raw Material Name	State	Quantity gal	Quantity lbs	Density lbs/gal	Volatile lb/btch	Solids lb/btch	Water lb/btch	VOC lb/btch	Total HAP lb/btch	Formaldehyde lb/btch	Ethyl Acrylate lb/btch	Vinyl Acetate lb/btch	Acrylonitrile lb/btch	Ammonia lb/btch
33004	CTG D (X92)														
78000	WATER	Liquid	78.0	650.52	8.34	650.52	0.00	650.52	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77104	FOAMMASTER NXZ	Liquid	0.8	6.00	7.59	2.81	3.19	0.00	2.81	2.81	0.00	0.00	0.00	0.00	0.00
77201	DISPEX N40	Liquid	0.5	5.50	10.01	2.75	2.75	2.75	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77187	ULTRA WHITE 90	Solid	52.8	1100.00	20.85	0.00	1100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
73042	26138 (XPE-138)	Liquid	261.51	2290.0	8.76	1145.00	1145.00	1144.26	0.74	0.00	0.74	0.00	0.69	0.00	0.06
	Batch Total		**393.60**	**4052.02**	**10.29**	**1801.08**	**2250.94**	**1797.53**	**3.56**	**2.81**	**0.74**	**0.00**	**0.69**	**0.00**	**0.06**
33005	CTG E														
78000	WATER	Liquid	342.0	2852.28	8.34	2852.28	0.00	2852.28	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77104	FOAMMASTER NXZ	Liquid	0.0	0.20	7.59	0.10	0.11	0.00	0.10	0.10	0.00	0.00	0.00	0.00	0.00
77056	PENFORD GUM 280	Solid	23.21	300.0	12.93	0.00	300.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Batch Total		**365.23**	**3152.48**	**8.63**	**2852.38**	**300.11**	**2852.28**	**0.10**	**0.10**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**
33006	CTG F (BC-14 Colors)														
78000	WATER	Liquid	120.00	1000.8	8.34	1000.80	0.00	1000.80	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77126	TSPP	Solid	0.37	2.75	7.51	0.00	2.75	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77104	FOAMMASTER NXZ	Liquid	0.61	4.66	7.59	2.19	2.47	0.00	2.19	2.19	0.00	0.00	0.00	0.00	0.00
77185	HT CLAY	Solid	86.3	1800.00	20.85	0.00	1800.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
73004	2671	Liquid	255.8	2240.00	8.76	1043.50	1198.40	1041.60	1.90	0.00	1.90	1.34	0.56	0.00	0.00
77001	AQUA AMMONIA	Liquid	1.00	8.3	8.34	8.32	0.00	6.24	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Batch Total		**464.10**	**5056.53**	**10.90**	**2054.81**	**3003.62**	**2048.64**	**4.09**	**2.19**	**1.90**	**1.34**	**0.56**	**0.00**	**0.00**
33007	CTG G (BC-14 Whites)														
78000	WATER	Liquid	120.00	1000.8	8.34	1000.80	0.00	1000.80	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77126	TSPP	Solid	0.37	2.75	7.51	0.00	2.75	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77104	FOAMMASTER NXZ	Liquid	0.61	4.60	7.59	2.16	2.44	0.00	2.16	2.16	0.00	0.00	0.00	0.00	0.00
77084	ULTRA GLOSS 90	Solid	86.3	1800.00	20.85	0.00	1800.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
73004	2671	Liquid	255.8	2240.00	8.76	1043.50	1198.40	1041.60	1.90	0.00	1.90	1.34	0.56	0.00	0.00
77001	AQUA AMMONIA	Liquid	1.00	8.32	8.34	8.32	0.00	6.24	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Batch Total		**464.10**	**5056.47**	**10.90**	**2054.78**	**3003.59**	**2048.64**	**4.06**	**2.16**	**1.90**	**1.34**	**0.56**	**0.00**	**0.00**
33008	CTG H (X67)														
73098	TYLAC 68159-00	Liquid	56.2	469.00	8.34	469.00	0.00	469.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
71118	TINOPAL PT LIQUID	Liquid	0.09	0.88	10.01	0.69	0.18	0.69	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77141	Bubble Breaker 748 Defoamer	Liquid	0.03	0.22	7.34	0.00	0.22	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Batch Total		**56.35**	**470.10**	**8.34**	**469.69**	**0.40**	**469.69**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

REXAM Dc
Brownville, NY

TABLE TWO

ENVISION ENVIRONMENTAL
Date: 5/10/98
Revision: Draft

BATCH COATING MATERIAL CHARACTERISTICS

Part #	Raw Material Name	State	Quantity gal	Quantity lbs	Density lbs/gal	Volatile lb/btch	Solids lb/btch	Water lb/btch	VOC lb/btch	Total HAP's lb/btch	Formaldehyde lb/btch	Ethyl Acrylate lb/btch	Vinyl Acetate lb/btch	Acrylonitrile lb/btch	Ammonia lb/btch
33010	CTG J														
78000	WATER	Liquid	25.00	208.50	8.34	208.50	0.00	208.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77930	Calcium Carbonate Covercarb	Liquid	216.85	3400.00	15.68	986.00	2414.00	986.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77201	DISPEX N40	Liquid	0.57	5.72	10.01	2.86	2.86	2.86	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77194	FOAMASTER VF	Liquid	0.75	5.72	7.67	0.57	5.15	0.00	0.57	0.57	0.00	0.00	0.00	0.00	0.00
77189	ANSILEX 93	Solid	33.57	700.00	20.85	0.00	700.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77207	TACKIDEX 332F	Solid	4.12	86.00	20.85	0.00	86.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
74201	METSOL DT3H	Liquid	0.28	3.00	10.84	0.06	2.94	0.00	0.06	0.06	0.00	0.00	0.00	0.00	0.00
73094	AIRFLEX 100HS	Liquid	183.08	1588.00	8.67	881.66	706.34	873.40	8.26	0.00	8.26	0.32	0.00	7.94	0.00
77173	POLY-EM 40	Liquid	3.46	28.0	8.09	16.82	11.18	16.80	0.02	0.00	0.02	0.02	0.00	0.00	0.00
	Batch Total		467.68	6024.94	12.88	2096.47	3928.47	2087.56	8.91	0.63	8.28	0.34	0.00	7.94	0.00
33011	CTG K														
78000	WATER	Liquid	111.00	925.74	8.34	925.74	0.00	925.74	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77197	CALGON T	Solid	0.07	1.50	20.85	0.00	1.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77194	FOAMASTER VF	Liquid	0.42	3.20	7.67	0.32	2.88	0.00	0.32	0.32	0.00	0.00	0.00	0.00	0.00
71118	TINOPAL PT LIQUID	Liquid	1.84	18.40	10.01	14.54	3.86	14.54	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77930	Calcium Carbonate Covercarb	Liquid	15.94	250.00	15.68	72.50	177.50	72.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77207	TACKIDEX 332F	Solid	0.48	10.00	20.85	0.00	10.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77189	ANSILEX 93	Solid	19.18	400.00	20.85	0.00	400.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77187	ULTRA WHITE 90	Solid	79.14	1650.00	20.85	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
74201	METSOL DT3H	Liquid	0.28	3.00	10.84	0.06	2.94	0.00	0.06	0.06	0.00	0.00	0.00	0.00	0.00
73094	AIRFLEX 100HS	Liquid	108.37	940.00	8.67	521.89	418.11	517.00	4.89	0.00	4.89	0.19	0.00	4.70	0.00
73004	2671	Liquid	7.99	70.00	8.76	32.61	37.45	32.55	0.06	0.00	0.06	0.04	0.02	0.00	0.00
77193	ROPAQUE HP-91 (7-1066)	Liquid	32.48	298.00	9.17	216.65	81.35	216.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77173	POLY-EM 40	Liquid	3.71	30.00	8.09	18.02	11.98	18.00	0.02	0.00	0.02	0.02	0.00	0.00	0.00
77001	AQUA AMMONIA	Liquid	0.63	5.26	8.34	5.26	0.00	3.95	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Batch Total		381.54	4605.10	12.07	1807.58	1147.58	1800.32	5.35	0.38	4.97	0.25	0.02	4.70	0.00
33016	CTG P														
78000	WATER	Liquid	105.00	875.70	8.34	875.70	0.00	875.70	0.00	0.00	0.00	0.00	0.00	0.00	0.00
73042	26138 (XPE-138)	Liquid	64.63	566.00	8.76	283.00	283.00	282.82	0.18	0.00	0.18	0.00	0.17	0.00	0.01
77104	FOAMMASTER NXZ	Liquid	0.24	1.80	7.59	0.84	0.96	0.00	0.84	0.84	0.00	0.00	0.00	0.00	0.00
	Batch Total		169.87	1443.50	8.50	1159.54	283.96	1158.52	1.03	0.84	0.18	0.00	0.17	0.00	0.01

REXAM DSI
Brownville, NY

TABLE TWO-4

BATCH COATING MATERIAL CHARACTERISTICS

ENVISION ENVIRONMENTAL
Date: 5/10/98
Revision: Draft

Raw Material																
Part #	Name	State	Quantity gal	Quantity lbs	Density lbs/gal	Volatile lb/btch	Solids lb/btch	Water lb/btch	VOC lb/btch	Total HAP lb/btch	Formal-dehyde lb/btch	Ethyl Acrylate lb/btch	Vinyl Acetate lb/btch	Acrylo-nitrile lb/btch	Ammo nia lb/btch
33019	CTG S (K5)														
73097	RHOPLEX R-225 (6-4225)	Liquid	49.05	450.00	9.17	279.00	171.00	279.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77173	POLY-EM 40	Liquid	2.97	24.00	8.09	14.42	9.58	14.40	0.02	0.00	0.02	0.02	0.00	0.00	0.00
77194	FOAMASTER VF	Liquid	0.05	0.40	7.67	0.04	0.36	0.00	0.04	0.04	0.00	0.00	0.00	0.00	0.00
	Batch Total		**52.07**	**474.40**	**9.11**	**293.46**	**180.94**	**293.40**	**0.06**	**0.04**	**0.02**	**0.02**	**0.00**	**0.00**	**0.00**
33020	CTG T (X42)														
78000	WATER	Liquid	0.00	0.00	8.34	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77104	FOAMMASTER NXZ	Liquid	0.16	1.22	7.59	0.57	0.65	0.00	0.57	0.57	0.00	0.00	0.00	0.00	0.00
77930	Calcium Carbonate Covercarb	Liquid	107.79	1690.00	15.68	490.10	1199.90	490.10	0.00	0.00	0.00	0.00	0.00	0.00	0.00
73004	2671	Liquid	71.14	623.00	8.76	290.22	333.31	289.70	0.53	0.00	0.53	0.37	0.16	0.00	0.00
77145	RPS VANTAGE TI02	Liquid	9.45	165.50	17.51	46.34	119.16	46.34	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77001	AQUA AMMONIA	Liquid	0.24	1.97	8.34	1.97	0.00	1.48	0.00	0.00	0.00	0.00	0.00	0.00	0.00
71164	BHD 6015 BLUE	Liquid	0.00	0.05	10.84	0.04	0.02	0.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Batch Total		**188.78**	**2481.75**	**13.15**	**829.25**	**1653.03**	**827.65**	**1.10**	**0.57**	**0.53**	**0.37**	**0.16**	**0.00**	**0.00**
33022	CTG V														
78000	WATER	Liquid	118.00	984.12	8.34	984.12	0.00	984.12	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77201	DISPEX N40	Liquid	0.63	6.30	10.01	3.15	3.15	3.15	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77194	FOAMASTER VF	Liquid	0.74	5.70	7.67	0.57	5.13	0.00	0.57	0.57	0.00	0.00	0.00	0.00	0.00
77187	ULTRA WHITE 90	Solid	119.90	2500.00	20.85	0.00	2500.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77145	RPS VANTAGE TI02	Liquid	36.54	640.00	17.51	179.20	460.80	179.20	0.00	0.00	0.00	0.00	0.00	0.00	0.00
73094	AIRFLEX 100HS	Liquid	172.94	1500.00	8.67	832.80	667.20	825.00	7.80	0.00	7.80	0.30	0.00	7.50	0.00
77173	POLY-EM 40	Liquid	3.58	29.00	8.09	17.42	11.58	17.40	0.02	0.00	0.02	0.02	0.00	0.00	0.00
77001	AQUA AMMONIA	Liquid	0.76	6.32	8.34	6.32	0.00	4.74	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77207	TACKIDEX 332F	Solid	0.48	10.0	20.85	0.00	10.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Batch Total		**453.58**	**5681.44**	**12.53**	**2023.58**	**3657.86**	**2013.61**	**8.39**	**0.57**	**7.82**	**0.32**	**0.00**	**7.50**	**0.00**

REXAM DSI
Brownville, NY

TABLE TWO-5

BATCH COATING MATERIAL CHARACTERISTICS

ENVISION ENVIRONMENTAL
Date: 5/10/98
Revision: Draft

Part #	Raw Material Name	State	Quantity gal	Quantity lbs	Density lbs/gal	Volatile lb/btch	Solids lb/btch	Water lb/btch	VOC lb/btch	Total HAP lb/btch	Formal-dehyde lb/btch	Ethyl Acrylate lb/btch	Vinyl Acetate lb/btch	Acrylo-nitrile lb/btch	Ammo-nia lb/btch
33023	CTG W														
78000	WATER	Liquid	111.00	925.74	8.34	925.74	0.00	925.74	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77197	CALGON T	Solid	0.07	1.50	20.85	0.00	1.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77194	FOAMASTER VF	Liquid	0.42	3.20	7.67	0.32	2.88	0.00	0.32	0.32	0.00	0.00	0.00	0.00	0.00
77187	ULTRA WHITE 90	Solid	79.14	1650.00	20.85	0.00	1650.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77189	ANSILEX 93	Solid	19.18	400.00	20.85	0.00	400.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77930	Calcium Carbonate Covercarb	Liquid	15.94	250.00	15.68	72.50	177.50	72.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77193	ROPAQUE HP-91 (7-1066)	Liquid	32.48	298.00	9.17	216.65	81.35	216.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00
73094	AIRFLEX 100HS	Liquid	115.29	1000.00	8.67	555.20	444.80	550.00	5.20	0.00	5.20	0.20	0.00	5.00	0.00
73004	2671	Liquid	8.11	71.00	8.76	33.08	37.99	33.02	0.06	0.00	0.06	0.04	0.02	0.00	0.00
77173	POLY-EM 40	Liquid	3.71	30.00	8.09	18.02	11.98	18.00	0.02	0.00	0.02	0.02	0.00	0.00	0.00
77001	AQUA AMMONIA	Liquid	0.63	5.29	8.34	5.29	0.00	3.97	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77207	TACKIDEX 332F	Solid	0.48	10.0	20.85	0.00	10.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Batch Total		386.46	4644.73	12.02	1826.79	2818.00	1819.27	5.60	0.32	5.28	0.26	0.02	5.00	0.00
33025	CTG Y														
78000	WATER	Liquid	24.00	200.16	8.34	200.16	0.00	200.16	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77201	DISPEX N40	Liquid	0.18	1.80	10.01	0.90	0.90	0.90	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77194	FOAMASTER VF	Liquid	0.72	5.50	7.67	0.55	4.95	0.00	0.55	0.55	0.00	0.00	0.00	0.00	0.00
77930	Calcium Carbonate Covercarb	Liquid	215.89	3385.00	15.68	981.65	2403.35	981.65	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77145	RPS VANTAGE TI02	Liquid	36.54	640.00	17.51	179.20	460.80	179.20	0.00	0.00	0.00	0.00	0.00	0.00	0.00
73094	AIRFLEX 100HS	Liquid	167.17	1450.00	8.67	805.04	644.96	797.50	7.54	0.00	7.54	0.29	0.00	7.25	0.00
77173	POLY-EM 40	Liquid	3.46	28.00	8.09	16.82	11.18	16.80	0.02	0.00	0.02	0.02	0.00	0.00	0.00
77207	TACKIDEX 332F	Solid	0.48	10.0	20.85	0.00	10.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Batch Total		448.44	5720.46	12.76	2184.32	3536.14	2176.21	8.11	0.55	7.56	0.31	0.00	7.25	0.00

REXAM DSI
Brownville, NY

TABLE TWO-6

BATCH COATING MATERIAL CHARACTERISTICS

ENVISION ENVIRONMENTAL
Date: 5/10/98
Revision: Draft

Part #	Raw Material Name	State	Quantity gal	Quantity lbs	Density lbs/gal	Volatile lb/btch	Solids lb/btch	Water lb/btch	% VOC lb/btch	Total HAP lb/btch	Formaldehyde lb/btch	Ethyl Acrylate lb/btch	Vinyl Acetate lb/btch	Acrylonitrile lb/btch	Ammonia lb/btch
33026	CTG Z														
78000	WATER	Liquid	154.00	1284.36	8.34	1284.36	0.00	1284.36	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77197	CALGON T	Solid	0.09	1.80	20.85	0.00	1.80	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77194	FOAMASTER VF	Liquid	0.55	4.20	7.67	0.42	3.78	0.00	0.42	0.42	0.00	0.00	0.00	0.00	0.00
77187	ULTRA WHITE 90	Solid	105.52	2200.00	20.85	0.00	2200.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77189	ANSILEX 93	Solid	23.98	500.00	20.85	0.00	500.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77929	CALCIUM CARBONATE H-90	Liquid	15.94	250.00	15.68	72.50	177.50	72.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77193	ROPAQUE HP-91 (7-1066)	Liquid	41.86	384.00	9.17	279.17	104.83	278.40	0.00	0.00	0.00	0.00	0.00	0.00	0.00
73094	AIRFLEX 100HS	Liquid	149.88	1300.00	8.67	721.76	578.24	715.00	6.76	0.00	6.76	0.26	0.00	6.50	0.00
73004	2671	Liquid	9.82	86.00	8.76	40.06	46.01	39.99	0.07	0.00	0.07	0.05	0.02	0.00	0.00
77173	POLY-EM 40	Liquid	4.94	40.00	8.09	24.03	15.97	24.00	0.03	0.00	0.03	0.03	0.00	0.00	0.00
77001	AQUA AMMONIA	Liquid	0.91	7.60	8.34	7.60	0.00	5.70	0.00	0.00	0.00	0.00	0.00	0.00	0.00
71118	TINOPAL PT LIQUID	Liquid	2.40	24.00	10.01	18.96	5.04	18.96	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77207	TACKIDEX 332F	Solid	0.05	1.00	20.85	0.00	1.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
74201	METSOL DT3H	Liquid	0.28	3.00	10.84	0.06	2.94	0.00	0.06	0.06	0.00	0.00	0.00	0.00	0.00
	Batch Total		**510.21**	**6085.96**	**11.93**	**2448.92**	**3637.11**	**2438.91**	**7.34**	**0.48**	**6.86**	**0.34**	**0.02**	**6.50**	**0.00**
33164	Clay Slurry 62% Solids														
78000	WATER	Liquid	156.00	1301.04	8.34	1301.04	0.00	1301.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77104	FOAMMASTER NXZ	Liquid	0.14	1.10	7.59	0.52	0.58	0.00	0.52	0.52	0.00	0.00	0.00	0.00	0.00
74201	METSOL DT3H	Liquid	0.02	0.25	10.84	0.01	0.25	0.00	0.01	0.01	0.00	0.00	0.00	0.00	0.00
77126	TSPP	Solid	0.33	2.50	7.51	0.00	2.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77084	ULTRA GLOSS 90	Solid	105.52	2200.0	20.85	0.00	2200.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Batch Total		**262.02**	**3504.89**	**13.38**	**1301.56**	**2203.33**	**1301.04**	**0.52**	**0.52**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**
33046	CTG X6														
78000	WATER	Liquid	30.00	250.20	8.34	250.20	0.00	250.20	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77145	RPS VANTAGE TI02	Liquid	63.09	1105.00	17.51	309.40	795.60	309.40	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77212	SYLOID 620	Solid	2.85	50.00	17.51	27.50	22.50	27.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77207	TACKIDEX 332F	Solid	1.06	22.00	20.85	0.00	22.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
77104	FOAMMASTER NXZ	Liquid	1.32	10.00	7.59	4.69	5.31	0.00	4.69	4.69	0.00	0.00	0.00	0.00	0.00
77187	ULTRA WHITE 90	Solid	38.37	800.00	20.85	0.00	800.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
74201	METSOL DT3H	Liquid	0.05	0.50	10.84	0.01	0.49	0.00	0.01	0.01	0.00	0.00	0.00	0.00	0.00
73004	2671	Liquid	227.25	1990.0	8.76	927.04	1064.65	925.35	1.69	0.00	1.69	1.19	0.50	0.00	0.00
	Batch Total		**363.98**	**4227.70**	**11.62**	**1518.84**	**2710.55**	**1512.45**	**6.39**	**4.70**	**1.69**	**1.19**	**0.50**	**0.00**	**0.00**

END

REXAM DSI
Brownville, NY

TABLE THREE

BATCH COATING MATERIAL CHARACTERISTICS SUMMARY

ENVISION ENVIRONMENTAL
Date: 5/10/98
Revision: Draft

Batch Coating															
Part	Name	Quantity		Density	Volatile	Solids	Water	Water	VOC	Total	Formal-	Ethyl	Vinyl	Acrylo-	Ammo-
#		gal	lbs	lbs/gal	lb/btch	lb/btch	lb/btch	gal/btch	lb/btch	HAP lb/btch	dehyde lb/btch	Acrylate lb/btch	Acetate lb/btch	nitrile lb/btch	nia lb/btch
33001	CTG A (A-58)	393.05	4646.70	11.82	1907.18	2738.06	1904.27	228.33	1.33	0.85	0.60	0.25	0.00	0.00	1.58
33002	CTG B (A-50)	483.05	5397.30	11.17	3507.15	1890.15	3505.13	420.28	2.02	0.48	1.54	1.54	0.00	0.00	0.00
33003	CTG C (X90)	442.07	4997.70	11.31	2313.01	2684.69	2309.81	276.96	1.35	1.35	0.75	0.60	0.00	0.00	1.85
33004	CTG D (X92)	393.60	4052.02	10.29	1801.08	2250.94	1797.53	215.53	3.56	2.81	0.74	0.00	0.69	0.00	0.06
33005	CTG E	365.23	3152.48	8.63	2852.38	300.11	2852.28	342.00	0.10	0.10	0.00	0.00	0.00	0.00	0.00
33006	CTG F (BC-14 Colors)	464.10	5056.53	10.90	2054.81	3003.62	2048.64	245.64	4.09	2.19	1.90	1.34	0.56	0.00	0.00
33007	CTG G (BC-14 Whites)	464.10	5056.47	10.90	2054.78	3003.59	2048.64	245.64	4.06	2.16	1.90	1.34	0.56	0.00	0.00
33008	CTG H (X67)	56.35	470.10	8.34	469.69	0.40	469.69	56.32	0.00	0.00	0.00	0.00	0.00	0.00	0.00
33010	CTG J	467.68	6024.94	12.88	2096.47	3928.47	2087.56	250.31	8.91	0.63	8.28	0.34	0.00	7.94	0.00
33011	CTG K	381.54	4605.10	12.07	1807.58	1147.58	1800.32	215.87	5.35	0.38	4.97	0.25	0.02	4.70	0.00
33016	CTG P	169.87	1443.50	8.50	1159.54	283.96	1158.52	138.91	1.03	0.84	0.18	0.00	0.17	0.00	0.01
33019	CTG S (K5)	52.07	474.40	9.11	293.46	180.94	293.40	35.18	0.06	0.04	0.02	0.02	0.00	0.00	0.00
33020	CTG T (X42)	188.78	2481.75	13.15	829.25	1653.03	827.65	99.24	1.10	0.57	0.53	0.37	0.16	0.00	0.00
33022	CTG V	453.58	5681.44	12.53	2023.58	3657.86	2013.61	241.44	8.39	0.57	7.82	0.32	0.00	7.50	0.00
33023	CTG W	386.46	4644.73	12.02	1826.79	2818.00	1819.27	218.14	5.60	0.32	5.28	0.26	0.02	5.00	0.00
33025	CTG Y	448.44	5720.46	12.76	2184.32	3536.14	2176.21	260.94	8.11	0.55	7.56	0.31	0.00	7.25	0.00
33026	CTG Z	510.21	6085.96	11.93	2448.92	3637.11	2438.91	292.44	7.34	0.48	6.86	0.34	0.02	6.50	0.00
33164	Clay Slurry 62% Solids	262.02	3504.89	13.38	1301.56	2203.33	1301.04	156.00	0.52	0.52	0.00	0.00	0.00	0.00	0.00
33046	CTG X6	363.98	4227.70	11.62	1518.84	2710.55	1512.45	181.35	6.39	4.70	1.69	1.19	0.50	0.00	0.00

REXAM DSI
Brownville, NY

TABLE FOUR

ENVISION ENVIRONMENTAL
Date: 5/10/98
Revision: Draft

BATCH COATING VOC CONTENT SUMMARY

Part #	Batch Coating	(1) (VOC)a lbs/gal	(Dc)a lbs/gal	(Wv)a Fract	(Ww)a Fract	(We)a Fract	(Ve)a Fract	(Vw)a Fract	(2) VOC lbs/gal	(3) HAP lbs/gal
33001	CTG A (A-58)	**0.018**	11.82	0.4104	0.4098	0.00	0.00	0.58	0.0034	0.0022
33002	CTG B (A-50)	**0.032**	11.17	0.6498	0.6494	0.00	0.00	0.87	0.0042	0.0010
33003	CTG C (X90)	**0.019**	11.31	0.4628	0.4622	0.00	0.00	0.63	0.0030	0.0030
33004	CTG D (X92)	**0.020**	10.29	0.4445	0.4436	0.00	0.00	0.55	0.0090	0.0072
33005	CTG E	**0.004**	8.63	0.9048	0.9048	0.00	0.00	0.94	0.0003	0.0003
33006	CTG F (BC-14 Colors)	**0.028**	10.90	0.4064	0.4051	0.00	0.00	0.53	0.0088	0.0047
33007	CTG G (BC-14 Whites)	**0.028**	10.90	0.4064	0.4052	0.00	0.00	0.53	0.0088	0.0046
33008	CTG H (X67)	**0.000**	8.34	0.9991	0.9991	0.00	0.00	1.00	0.0000	0.0000
33010	CTG J	**0.041**	12.88	0.3480	0.3465	0.00	0.00	0.54	0.0190	0.0014
33011	CTG K	**0.044**	12.07	0.3925	0.3909	0.00	0.00	0.57	0.0140	0.0010
33016	CTG P	**0.033**	8.50	0.8033	0.8026	0.00	0.00	0.82	0.0061	0.0050
33019	CTG S (K5)	**0.003**	9.11	0.6186	0.6185	0.00	0.00	0.68	0.0011	0.0008
33020	CTG T (X42)	**0.018**	13.15	0.3341	0.3335	0.00	0.00	0.53	0.0058	0.0030
33022	CTG V	**0.047**	12.53	0.3562	0.3544	0.00	0.00	0.53	0.0185	0.0013
33023	CTG W	**0.045**	12.02	0.3933	0.3917	0.00	0.00	0.56	0.0145	0.0008
33025	CTG Y	**0.043**	12.76	0.3818	0.3804	0.00	0.00	0.58	0.0181	0.0012
33026	CTG Z	**0.046**	11.93	0.4024	0.4007	0.00	0.00	0.57	0.0144	0.0009
33164	Clay Slurry 62% Solids	**0.005**	13.38	0.3714	0.3712	0.00	0.00	0.60	0.0020	0.0020
33046	CTG X6	**0.035**	11.62	0.3593	0.3577	0.00	0.00	0.50	0.0176	0.0129

Notes:

1) Compliance value, lbs VOC/gal coating, less water & exempt solvents. Used for judging compliance
   Coating VOC content compliance level for Paper Coating Operations is 2.9 lbs VOC/gal
   coating less water & exempt solvents, as 6 NYCRR 228.7, Table One.
2) Actual value, lbs VOC/gal coating as applied. Used for calculating VOC emissions
3) Actual value, lbs HAP/gal coating as applied. Used for calculating HAP emissions

$$(VOC)a = \frac{(Dc)a \times [(Wv)a - (Ww)a - (We)a]}{1 - [(Vw)a + (Ve)a]}$$

as per 6 NYCRR 228.2(b)(11)

REXAM DSI
Brownville, NY

TABLE FIVE

ENVISION ENVIRONMENTAL
Date: 5/10/98
Revision: Draft

ANNUAL VOC EMISSIONS
For the period, March '97 through March '98

Part #	Batch Coating	Batches Q	Volume gal/batch	Total Volume gal	VOC lb/gal	VOC Emissions lb/yr	VOC Emissions tons/yr
33001	CTG A (A-58)	50.5	393.1	19849.1	0.0034	67.1	0.0336
33002	CTG B (A-50)	281.9	483.1	136172.5	0.0042	569.1	0.2846
33003	CTG C (X90)	484.5	442.1	214180.6	0.0030	653.2	0.3266
33004	CTG D (X92)	116.1	393.6	45697.3	0.0090	413.2	0.2066
33005	CTG E	282.1	365.2	103032.5	0.0003	27.0	0.0135
33006	CTG F (BC-14 Colors)	152.1	464.1	70590.2	0.0088	622.0	0.3110
33007	CTG G (BC-14 Whites)	32.8	464.1	15222.4	0.0088	133.2	0.0666
33008	CTG H (X67)	36.3	56.4	2045.6	0.0000	0.00	0.0000
33010	CTG J	42.2	467.7	19736.3	0.0190	376.0	0.1880
33011	CTG K	124.4	381.5	47463.7	0.0140	665.4	0.3327
33016	CTG P	9.1	169.9	1545.8	0.0061	9.4	0.0047
33019	CTG S (K5)	33.0	52.1	1718.3	0.0011	1.87	0.0009
33020	CTG T (X42)	16.7	188.8	3152.7	0.0058	18.4	0.0092
33022	CTG V	22.8	453.6	10341.6	0.0185	191.3	0.0956
33023	CTG W	28.2	386.5	10898.2	0.0145	158.0	0.0790
33025	CTG Y	69.9	448.4	31346.3	0.0181	566.9	0.2834
33026	CTG Z	1.70	510.2	867.4	0.0144	12.5	0.0062
33164	Clay Slurry 62% Solids	0.0	262.0	0.000	0.0020	0.000	0.0000
33046	CTG X6	13.8	364.0	5023.0	0.0176	88.2	0.0441
				738883		**4573**	**2.29**

REXAM DSI
Brownville, NY

TABLE SIX

ENVISION ENVIRONMENTAL
Date: 5/10/98
Revision: Draft

ANNUAL HAP EMISSIONS
For the period, March '97 through March '98

Part #	Batch Coating	Batches Q	Volume gal/batch	Total Volume gal	HAP lb/gal	HAP Emissions lb/yr	HAP Emissions tons/yr
33001	CTG A (A-58)	50.5	393.1	19849.1	0.0022	42.9	0.0215
33002	CTG B (A-50)	281.9	483.1	136172.5	0.0010	135.0	0.0675
33003	CTG C (X90)	484.5	442.1	214180.6	0.0030	653.2	0.3266
33004	CTG D (X92)	116.1	393.6	45697.3	0.0072	326.8	0.1634
33005	CTG E	282.1	365.2	103032.5	0.0003	27.0	0.0135
33006	CTG F (BC-14 Colors)	152.1	464.1	70590.2	0.0047	332.4	0.1662
33007	CTG G (BC-14 Whites)	32.8	464.1	15222.4	0.0046	70.8	0.0354
33008	CTG H (X67)	36.3	56.4	2045.6	0.0000	0.00	0.0000
33010	CTG J	42.2	467.7	19736.3	0.0014	26.7	0.0133
33011	CTG K	124.4	381.5	47463.7	0.0010	47.3	0.0236
33016	CTG P	9.1	169.9	1545.8	0.0050	7.7	0.0038
33019	CTG S (K5)	33.0	52.1	1718.3	0.0008	1.32	0.0007
33020	CTG T (X42)	16.7	188.8	3152.7	0.0030	9.6	0.0048
33022	CTG V	22.8	453.6	10341.6	0.0013	13.0	0.0065
33023	CTG W	28.2	386.5	10898.2	0.0008	9.0	0.0045
33025	CTG Y	69.9	448.4	31346.3	0.0012	38.4	0.0192
33026	CTG Z	1.70	510.2	867.4	0.0009	0.8	0.0004
33164	Clay Slurry 62% Solids	0.0	262.0	0.000	0.0020	0.000	0.0000
33046	CTG X6	13.8	364.0	5023.0	0.0129	64.9	0.0324
				738883		**1807**	**0.90**

APPENDIX 46

1999 Fire Debris Disposal

WASTE TECHNOLOGY SERVICES INC.

Oil Sludge from Inside Oil Burner

FAX TRANSMITTAL SHEET

Telephone....(716) 282-4100
Fax....(716) 282-6986

To: Mark Lapsley / Dennis Trombley

From: Mike Oliver

Comments: Mark / Dennis - Per Bill Hickle - Aspex please review the attached waste profile and complete the signature section on the last page by the X. Also need SIC code for facility. Please return via fax to my attention or call with questions. Thank you - Mike.

Date: 1/26/99 **Total Pages:** 3

Receiving Fax No: 315-782-5916

FAX FACTS from Waste Technology Services, Inc.

- EPA is proposing a rule which would suspend temporarily the applicability of the RCRA Toxicity Characteristic (TC) Rule (40 CFR 261.24) to debris generated during lead-based paint abatements conducted at target housing; deleading projects conducted at public or commercial buildings; and renovation or remodeling and demolition activities at target housing, public buildings, or commercial buildings. Instead of being subject to RCRA the activities would be subject to management and disposal standards being proposed under Title IV of TSCA.

- The EPA gave states more time to comment on state-by-state budgets for nitrogen oxides established under a recently promulgated rule designed to curb regional ozone transport.

- The EPA has extended, until Feb. 16, the comment period for the draft list of 53 chemicals targeted for waste minimization efforts.

REXAM

REXAM DSI
BRIDGE STREET
BROWNVILLE NY 13615
USA
FAX 1 315 782 5416
TELEPHONE
1 315 782 5800

OMNIFAX COVER SHEET

DAY: Wed.

DATE: 1/27/99

TIME: 9:40a

TO: Mike Oliver

OMNIFAX #: (716) 282-6986

SPEED DIAL EXT.:

FROM: Mark Lappies

NUMBER OF PAGES, INCLUDING COVER SHEET: 3

INFORMATION CONTAINED

Generators Waste Profile Sheets

WTS# 13117

GENERATOR'S WASTE PROFILE SHEET

PLEASE PRINT IN INK OR TYPE

Service Agreement on File? [X] YES [ ] NO

[ ] Hazardous [X] Non-Hazardous [ ] TSCA

Profile Number: WMI **CL 0216**

Renewal Date: / /

A. Waste Generator Information

1. Generator Name: Rexam/DSI
2. SIC Code:
3. Facility Street Address: Bridge Street
4. Phone: (315) 782-5800
5. Facility City: Brownville
6. State/Province: New York
7. Zip/Postal Code: 13615
8. Generator USEPA/Federal ID #: N/A
9. County: Jefferson
10. State/Province ID #:
11. Customer Name: Waste Technology Services, Inc
12. Customer Phone: (716) 282-4100
13. Customer Contact: Michael C. Oliver
14. Customer Fax: (716) 282-6986
15. Billing Address 640 Park Place, Niagara Falls, NY 14301 [ ] Same as above

B. Waste Stream Information

1. Description

a. Name of Waste: Charred #6 Oil clean-up/fire extinguishing Agent. WTS# 13117

b. Process Generating Waste: Clean-up from fire in boiler room where #6 fuel oil stored. Fire extingusihing agent (dry) used to put out fire.

c. Color	d. Strong odor (describe):	e. Physical state @ 70°F	f. Layers	g. Free liquid range
Black grey/whittish	Oil	[X] Solid [ ] Liquid [ ] Gas [ ] Sludge [ ] Other	[X] Single Layer [ ] Multi-layer	0 to % h. pH: Range N/A to %

i. Liquid Flash Point: [ ] <73°F [ ] 73-99°F [ ] 100-139°F [ ] 140-199°F [ ] ≥ 200°F [X] Not applicable

j. Chemical Composition (List all constituents [including halogenated organics, debris, and UHC's] present in any concentration and submit representative analysis):

Constituents	Concentration Range	Constituents	Concentration Range
Charred #6 fuel oil	85-90%		
Fire extinguishing Agent (See MSDS)	10-20%		

TOTAL COMPOSITION MUST EQUAL OR EXCEED 100%

k. [ ] Oxidizer [ ] Pyrophoric [ ] Explosive [ ] Radioactive [ ] Carcinogen [ ] Infectious [ ] Shock Sensitive [ ] Water Reactive

l. Does the waste represented by this profile contain any of the carcinogens which require OSHA notification? (list in Section B.1.j)..... [ ] YES [X] NO

m. Does the waste represented by this profile contain dioxins? (list in Section B.1.j)..... [ ] YES [X] NO

n. Does the waste represented by this profile contain asbestos?..... [ ] YES [X] NO
If yes..... [ ] friable [ ] non-friable

o. Does the waste represented by this profile contain benzene?..... [ ] YES [X] NO
If yes, concentration _____ ppm
Is the waste subject to the benzene waste operations NESHAP?..... [ ] YES [X] NO

p. Is the waste subject to RCRA Subpart CC controls?..... [ ] YES [X] NO
If yes, volatile organic concentration _____ ppmw

q. Does the waste contain any Class I or Class II ozone-depleting substances?..... [ ] YES [X] NO

r. Does the waste contain debris? (list in Section B.1.j)..... [ ] YES [X] NO

2. Quantity of Waste
Estimated Annual Volume 2-5 [ ] Tons [ ] Yards [X] Drums [ ] Other (specify) _____

3. Shipping Information
a. Packaging:
[ ] Bulk Solid; Type/Size: _____ [ ] Bulk Liquid; Type/Size: _____
[X] Drum; Type; Size: 55 gallon steel [ ] Other: _____
b. Shipping Frequency: Units Drums Per: [ ] Month [ ] Quarter [ ] Year [X] One time [ ] Other _____
c. Is this a U.S. Department of Transportation (USDOT) Hazardous Material? (If no, skip d, e, and f)..... [ ] YES [X] NO

Form WMI-4153 (09/97)

GENERATOR'S WASTE PROFILE SHEET

PLEASE PRINT IN INK OR TYPE

d. Reportable Quantity (lbs.;kgs.): N/A e. Hazard Class/ID #: N/A

f. USDOT Shipping Name: Non-regulated

g. Personal Protective Equipment Requirements: Gloves, eye safety

h. Transporter/Transfer Station: N/A

C. Generator's Certification (Please check appropriate responses, sign, and date below.)

1. Is this a USEPA hazardous waste (40 CFR Part 261)? If the answer is no, skip to 2 ☐YES ☒NO
   a. If yes, identify ALL USEPA listed and characteristic waste code numbers (D, F, K, P, U) _____
   b. If a characteristic hazardous waste, do underlying hazardous constituents (UHCs) apply? (If yes, list in Section B.1.j) ☐YES ☐NO
   c. Does this waste contain debris? (If yes, list size and type in Chemical Composition - B.1.) ☐YES ☐NO

2. Is this a state hazardous waste? ☐YES ☒NO
   Identify ALL state hazardous waste codes _____

3. Is the waste from a CERCLA (40 CFR 300, Appendix B) or state mandated clean-up? ☐YES ☒NO
   If yes, attach Record of Decision (ROD), 104/106 or 122 order or court order that governs site clean-up activity. For state mandated clean-up, provide relevant documentation.

4. Does the waste represented by this waste profile sheet contain radioactive material, or is disposal regulated by the Nuclear Regulatory Commission? ☐YES ☒NO

5. Does the waste represented by this waste profile sheet contain concentrations of Polychlorinated Biphenyls (PCBs) regulated by 40 CFR 761? (If yes, list in Chemical Composition - B.1.j) ☐YES ☒NO
   a. If yes, were the PCBs imported into the U.S.? ☐YES ☐NO

6. Do the waste profile sheet and all attachments contain true and accurate descriptions of the waste material, and has all relevant information within the possession of the Generator regarding known or suspected hazards pertaining to the waste been disclosed to the Contractor? ☒YES ☐NO

7. Will all changes which occur in the character of the waste be identified by the Generator and disclosed to the Contractor prior to providing the waste to the Contractor? ☒YES ☐NO

☐Check here if a Certificate of Destruction or Disposal is required.

Any sample submitted is representative as defined in 40 CFR 261 - Appendix I or by using an equivalent method. I authorize WM to obtain a sample from any waste shipment for purposes of recertification. If this certification is made by a broker, the undersigned signs as authorized agent of the generator and has confirmed the information contained in this Profile Sheet from information provided by the generator and additional information as it has determined to be reasonably necessary. If approved for management, Contractor has all the necessary permits and licenses for the waste that has been characterized and identified by this approved profile.

Certification Signature: X Steven M Langer Title: Senior Process Engineer

Name (Type or Print): Steven M Langer Company Name: Reram · DSI Date: 27Jan99

☒Check if additional information is attached. Indicate the number of attached pages 3

D. WM Management's Decision — FOR WM USE ONLY

1. Management Method ☐Landfill ☐Non-hazardous Solidification ☐Bioremediation ☐Incineration ☐Hazardous Stabilization ☐Other (Specify) _____
2. Proposed Ultimate Management Facility: _____
3. Precautions, Special Handling Procedures, or Limitation on Approval: _____

4. Waste Form _____ 5. Source _____ 6. System Type _____

Special Waste Decision ☐Approved ☐Disapproved

Salesperson's Signature: _____ Date: _____

Division Approval Signature (Optional): _____ Date: _____

Special Waste Approvals Person Signature: _____ Date: _____

Form WMI-4153 (09/97)

Invoice

Invoice Number: NY990010

AAPEX Services of New York, Inc.
4682 Crossroads Park Drive
Liverpool, New York 13088
315-413-0068

To:
Rexam DSI
Bridge Street
Brownville, New York 13615
Attn: Mark Lappies

Sales Person	Purchase Order Number	Date Shipped	Terms
William B. Hickok		2/26/99	Net 30 days

Date	Quantity	Description	Unit Price	Amount
Labor:				
1/18/99	4	Supervisor	35.00	140.00
1/18/99	1	Supervisor, overtime	48.13	48.13
1/18/99	8	2 Laborers	21.00	168.00
1/18/99	2	Laborer, overtime	28.88	57.76
			Labor Total	**413.89**
Mileage & Per Diem:				
1/18/99	540	3 personnel mileage	.25	135.00
1/18/99	180	Stack truck mileage	.37	66.60
			Mileage & Per Diem Total:	**201.60**
Equipment:				
1/18/99	1	LEL meter	40.00	40.00
1/18/99	3	Full face respirator	10.00	30.00
1/18/99	1	Low volume sampler	10.00	10.00
			Equipment Total	**80.00**
Material:				
1/18/99	2	Garbage bags	.50	1.00
1/18/99	2	17H drums	33.00	66.00
1/18/99	2	Drum liners	15.00	30.00
1/18/99	14	Coated tyveks	6.75	94.50
1/18/99	24	Glove liners	.75	18.00

1/18/99	12	Nitriles	1.50	18.00
1/18/99	6	Disposable boots	5.00	30.00
			Material Total	**257.50**
Cost Plus Items:				
	1	Disposal	684.80 + 10%	753.28
			Cost Plus Total	**753.28**
			Sub Total	**1706.27**
			Sales Tax %	**7%**
			Sales Tax	**119.44**
			Total Due	**1825.71**

Thank You!

Invoice

Invoice Number: NY990010

AAPEX Services of New York, Inc.
4682 Crossroads Park Drive
Liverpool, New York 13088
315-413-0068

To:
Rexam DSI
Bridge Street
Brownville, New York 13615
Attn: Mark Lappies

Sales Person	Purchase Order Number	Date Shipped	Terms
William B. Hickok		2/26/99	Net 30 days

Date	Quantity	Description	Unit Price	Amount
Labor:				
1/18/99	4	Supervisor	35.00	140.00
1/18/99	1	Supervisor, overtime	48.13	48.13
1/18/99	8	2 Laborers	21.00	168.00
1/18/99	2	Laborer, overtime	28.88	57.76
			Labor Total	**413.89**
Mileage & Per Diem:				
1/18/99	540	3 personnel mileage	.25	135.00
1/18/99	180	Stack truck mileage	.37	66.60
			Mileage & Per Diem Total:	**201.60**
Equipment:				
1/18/99	1	LEL meter	40.00	40.00
1/18/99	3	Full face respirator	10.00	30.00
1/18/99	1	Low volume sampler	10.00	10.00
			Equipment Total	**80.00**
Material:				
1/18/99	2	Garbage bags	.50	1.00
1/18/99	2	17H drums	33.00	66.00
1/18/99	2	Drum liners	15.00	30.00
1/18/99	14	Coated tyveks	6.75	94.50
1/18/99	24	Glove liners	.75	18.00

1/18/99	12	Nitriles	1.50	18.00
1/18/99	6	Disposable boots	5.00	30.00
			Material Total	**257.50**
Cost Plus Items:				
	1	Disposal	684.80 + 10%	753.28
			Cost Plus Total	**753.28**
			Sub Total	**1706.27**
			Sales Tax %	**7%**
			Sales Tax	**119.44**
			Total Due	**1825.71**

Thank You!

WTS

INVOICE

WASTE TECHNOLOGY SERVICES, INC.
640 PARK PLACE
NIAGARA FALLS, NEW YORK 14301
(716)282-4100

ACCOUNT NUMBER: A20

INVOICE NO. : 32735
INVOICE DATE: Feb 24, 99
PAGE : 1

BILL TO: AAPEX ENVIR SERVICES INC
PO BOX 6415
SYRACUSE NY
13217-6415

RE: REXAN DSI

DISP FCLTY: CWM - MODEL CITY
HAULER : FRANK'S
SHIP DATE : Feb 23, 99
PMT TERMS : 1% 10/NET 30

CUST PO NO: W. HICKOK
WTS ORD NO: BB6039
SALESMAN : MCO
TYPE : P DIV: NY

DESCRIPTION	UNITS	QUANTITY	UNIT PRICE	AMOUNT
DISPOSAL OF #6 OIL SOLIDS	DRUM	2.00	95.000	190.00
LTL TRANSPORTATION	LTL	1.00	450.000	450.00

NOTE:
PAST DUE INVOICES WILL BE CHARGED AT 1.5 PERCENT PER MONTH. KINDLY ADD TO REMITTANCE.

SUBTOTAL	640.00
SALES TAX	44.80
INVOICE TOTAL	684.80

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. . . . . | Manifest Document No. 9.9.0.0.1 | 2. Page 1 of 1

3. Generator's Name and Mailing Address: Rexam DSI
Bridge Street
Brownville NY 13615

Bridge St.
Brownville, NY 13615

4. Generator's Phone (315) 782-5800

5. Transporter 1 Company Name: Frank's Vacuum Truck Service | 6. US EPA ID Number: N.Y.D.9.8.2.7.9.2.8.1.4 | A. Transporter's Phone: (716) 284-2132

7. Transporter 2 Company Name | 8. US EPA ID Number | B. Transporter's Phone

9. Designated Facility Name and Site Address:
CWM Chemical Services, LLC
1550 Balmer Road
Model City NY 14107

10. US EPA ID Number: N.Y.D.0.4.9.8.3.6.6.7.9

C. Facility's Phone: (716) 754-8231

11. Waste Shipping Name and Description	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol
a. Non-regulated #6 Oil Cleanup	002	D.M	00110	P
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
a.(S) 02 c.
d.
b.

E. Handling Codes for Wastes Listed Above
a.L c.
b. d.

15. Special Handling Instructions and Additional Information

WTS#BB6039 WO#487612

a.CL0216
(315) 782-5800 81501564

16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name	Signature	Month	Day	Year
CHARLES MACKEY		02	23	99

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
Ed Steigert		02	23	99

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

19. Discrepancy Indication Space

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

Printed/Typed Name	Signature	Month	Day	Year
Andrew Argona		02	24	99

GENERATOR

TRANSPORTER

FACILITY

ORIGINAL – RETURN TO GENERATOR

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. . . . . Manifest Document No. 9 9 0 0 1

2. Page 1 of 1

3. Generator's Name and Mailing Address Rexam DSI
Bridge Street
Brownville NY 13615

4. Generator's Phone (315) 782-5800

Bridge St.
Brownville, NY 13615

5. Transporter 1 Company Name: Frank's Vacuum Truck Service

6. US EPA ID Number: N.Y.D.9.8.2.7.9.2.8.1.4

A. Transporter's Phone: (716) 284-2132

7. Transporter 2 Company Name

8. US EPA ID Number

B. Transporter's Phone

9. Designated Facility Name and Site Address
CWM Chemical Services, LLC
1550 Balmer Road
Model City NY 14107

10. US EPA ID Number: N.Y.D.0.4.9.8.3.6.6.7.9

C. Facility's Phone: (716) 754-8231

11. Waste Shipping Name and Description	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol
a. Non-regulated #6 Oil Cleanup	002	DM	00011	P
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
a.(S)
b.
c.
d.

E. Handling Codes for Wastes Listed Above
a. L
b.
c.
d.

15. Special Handling Instructions and Additional Information

WTS#BB6039 WO#487612

a.CL0216

( ) 7 2 0 0

16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name	Signature	Month	Day	Year
Charlie Mercer		02	23	99

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
Ed Steigert		02	23	99

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

19. Discrepancy Indication Space

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

Printed/Typed Name	Signature	Month	Day	Year

GENERATOR

TRANSPORTER

FACILITY

GENERATOR'S COPY

52470

[redacted]

FRANK'S VACUUM TRUCK SERVICE, INC.
4500 Royal Avenue • Niagara Falls, New York 14303
(716) 284-2132

NYDEC #9A-332
EPA ID # NYD982792814

PICK UP

NAME: REXAM INC
STREET: BRIDGE ST
CITY: BROWNVILLE, NY STATE: ZIP CODE:
CONTACT NAME: MARK 1-315-782-58[illegible]
SCHEDULED TIME: 02/23/99

DELIVERY

NAME: CHEMICAL WASTE MANAGEMENT
STREET: 1550 BALMER ROAD
CITY: MODEL CITY, NY STATE: ZIP CODE:
CONTACT NAME: PATRICK COONEY 716-754-9465
SCHEDULED TIME: 02/23/99

ADDITIONAL INFORMATION

CUSTOMER P.O. NO.	WORK ORDER NUMBER	MANIFEST NUMBER	BILLING REFERENCE
814158		[redacted]	WASTEWATER
LOAD NUMBER	TRACTOR NUMBER	TRAILER NUMBER	DRIVER'S NAME
1761			

NUMBER & TYPES	WEIGHT OR VOLUME	HAZ. MAT.	DESCRIPTION OF WASTE OR MATERIAL	COST
DM	110	P	[illegible]	

TYPE (CIRCLE ONE)	PLACARDS PROVIDED OR AFFIXED		WHEN "RQ" QUANTITY RELEASED INTO ENVIRONMENT, IMMEDIATELY NOTIFY NAT. RESPONSE CENTER - 800-424-8802 AND 911 EMERGENCY SYSTEM OR LOCAL OPERATOR	EMERGENCY RESPONSE PHONE NUMBER:
TANK (S/S) (R/L)				
VAC				
DUMP	SHIPPER'S CHECK LIST			
VAN	DOT LABELS APPLIED AND SECURE	DOT AUTHORIZED CONTAINERS		
ROLL-OFF	PROPER DOT NAME ON ALL PACKAGES	CHECKED FOR PROPER SEALING		
FLATBED				

PICK UP

ARRIVAL DATE 2/23/99
ARRIVAL TIME 4:06 AM/PM RELEASE TIME 4:45 AM/PM
TRAILER EMPTY UPON ARRIVAL ☐ YES ☐ NO
(If not, explain below)
DIP MEASUREMENT (Tankers Only)_____INCHES
COMMENTS: (EXPLAIN ALL DELAYS) _____

[illegible]

SHIPPER'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.

X _____ TITLE _____
SHIPPER'S SIGNATURE

DELIVERY

DRIVER_____DATE _____
ARRIVAL TIME _____ AM/PM RELEASE TIME_____ AM/PM
TRAILER EMPTY UPON DEPARTURE ☐ YES ☐ NO
(If not, explain below)
COMMENTS: (EXPLAIN ALL DELAYS) _____

I, THE UNDERSIGNED, CERTIFY THAT THE ABOVE INFORMATION IS TRUE AND COMPLETE.

X _____
CONSIGNEE'S SIGNATURE

NON-HAZARDOUS WASTE

CL0216

OPTIONAL INFORMATION			
SHIPPER	Rexam DSI		
ADDRESS	Bridge St.		
CITY, STATE, ZIP	Brownville	NY	13615
CONTENTS	Non-regulated #6 Oil Cleanup		

32-HML-C

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NON-HAZARDOUS WASTE

CL0216

OPTIONAL INFORMATION			
SHIPPER	Rexam DSI		
ADDRESS	Bridge St.		
CITY, STATE, ZIP	Brownville	NY	13615
CONTENTS	Non-regulated #6 Oil Cleanup		

APPENDIX 47

March 1993 ENSA, Inc. Facility Environmental Compliance Audit

Environmental Services of America, Inc.

INTEX Division
Marguerite Drive West
RR#6, Box 8B
Canastota, NY 13032
Phone: (315) 697-3733
Fax: (315) 697-3291

INTEX-93\DSI007

March 8, 1994

Ms. Sandra A. Mercuri
Decorative Specialties International, Inc.
Bridge Street
Brownville, NY 13615

RE: Facility Environmental Compliance Audit
Decorative Specialties International, Inc.
Brownville, New York

Dear Ms. Mercuri:

Enclosed please find the Facility Environmental Compliance Audit Report for the Decorative Specialties International, Inc. (DSI) facility in Brownville, New York. The findings of the audit are based on INTEX's site inspection, the environmental file review conducted at the facility, and information provided by representatives of DSI, Inc.

ENSA's INTEX Division is available to assist the DSI, Inc. company in attaining and maintaining compliance with environmental regulations should the need arise.

If you have any questions, please contact this office.

Sincerely,
ENVIRONMENTAL SERVICES OF AMERICA, INC.
INTEX DIVISION

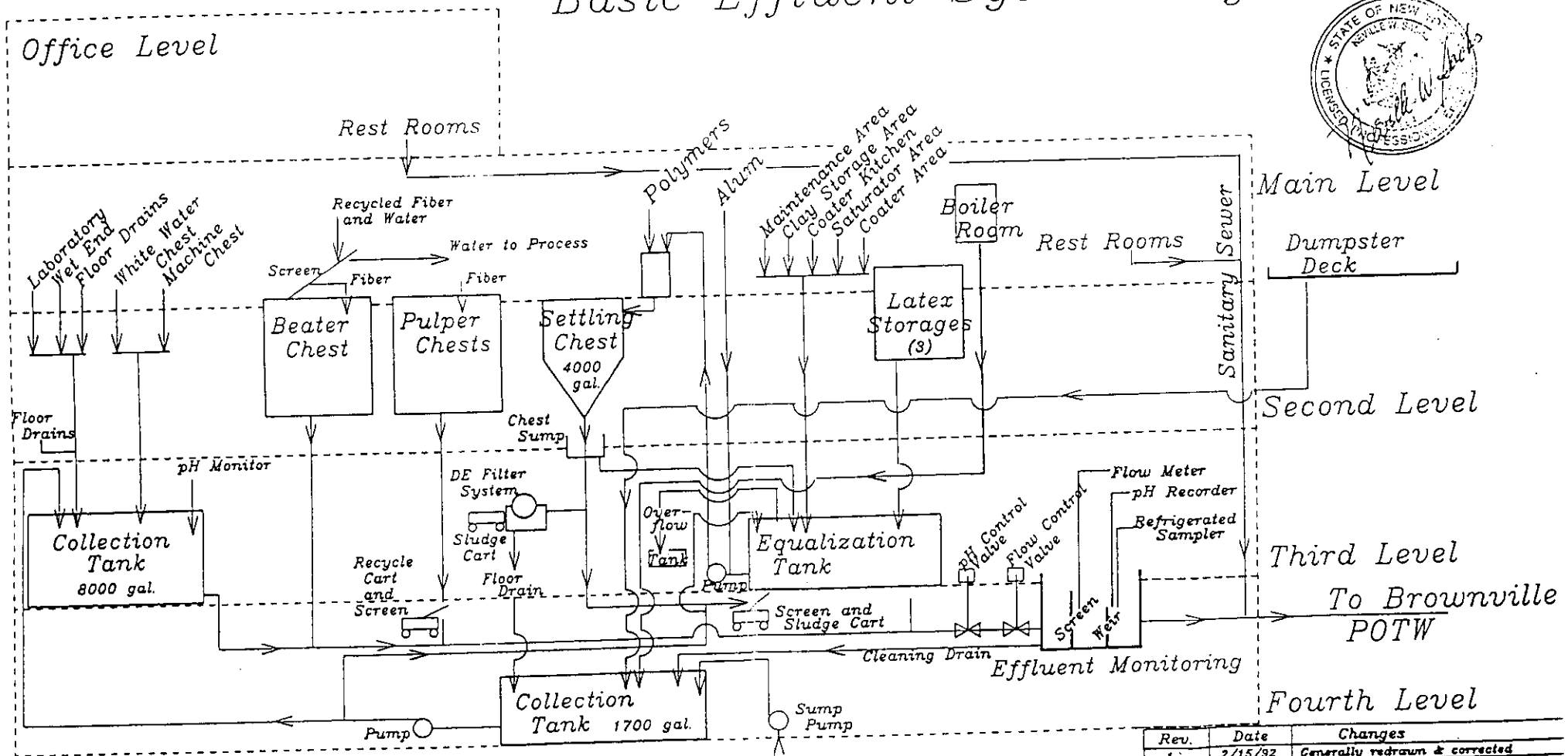
Richard E. Jones
Project Geologist

REJ:km
Enc.

cc: Joseph Jacobsen, INTEX
Luke McKenney, INTEX

FACILITY ENVIRONMENTAL COMPLIANCE AUDIT
DECORATIVE SPECIALTIES INTERNATIONAL, INC.
BROWNVILLE, NEW YORK
MARCH 1993

Decorative Specialties International, Inc., Brownville, NY
Basic Effluent System Layout



Rev.	Date	Changes
1	2/15/92	Generally redrawn & corrected
2	3/5/92	Maint & Chest pump revisions
3	6/11/92	Piping changes, added pH, flow cont.

2/14/92	Drawn by N.W. Sachs, P.E.	DSI100 Rev - 3

Sachs, Salvaterra & Associates, Inc.
Equipment Reliability Specialists
P. O. Box 254 Solvay, NY 13209

Figure 1
Facility Compliance Audit
DSI, Inc.
Brownville, New York

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BROWNVILLE, NEW YORK
MARCH 1993

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FACILITY ENVIRONMENTAL COMPLIANCE AUDIT
DECORATIVE SPECIALTIES INTERNATIONAL, INC.
BROWNVILLE, NEW YORK
MARCH 1993

I. INTRODUCTION

On July 2, 1993, INTEX completed the site inspection task of a facility compliance audit at the Decorative Specialties International, Inc. (DSI) facility located in Brownville, New York. The audit was conducted to evaluate the facility for compliance with current environmental regulations and to identify potential environmental liabilities (if any). The facility was evaluated for compliance with the following regulations:

- Resource Conservation and Recovery Act (RCRA), the Hazardous and Solid Waste Amendments (HSWA), the solid waste, hazardous waste and underground storage tank subprograms.
- Clean Water Act (CWA) and associated wastewater and stormwater discharge elimination system programs.
- Clean Air Act (CAA) and CAA Amendments.
- Safe Drinking Water Act (SDWA), including the Underground Injection Control (UIC) Program.
- Toxic Substance Control Act (TSCA).

To complete the facility compliance audit, INTEX performed a detailed site inspection during which interviews with key site personnel were conducted to familiarize INTEX with specific aspects of the manufacturing processes. INTEX reviewed material handling and spill response plans and evaluated compliance with the provisions of various air, wastewater and stormwater permits. INTEX reviewed disposal records and material safety data sheets to more accurately evaluate compliance with disposal regulations and reporting requirements.

II. REGULATORY, PERMITTING AND REPORTING REQUIREMENTS

To complete the facility compliance audit, INTEX reviewed the applicable regulatory, permit and reporting requirements of state and federal agencies in regards to the manufacturing operations at the DSI facility in Brownville, New York.

II.A. 1992 Hazardous Waste Reports

Sections 3002 and 3007 of the Resource Conservation and Recovery Act (RCRA, 1976); Hazardous and Solid Waste Amendments (HSWA, 1984); and 6 NYCRR, Parts 372 and 373 require that all facilities that meet the definition of a New York State Large Quantity Generator (LQG) during the year 1992, or facilities that treated, stored or disposed of RCRA or New York State hazardous wastes on site subject to RCRA permitting during 1992, complete the reporting requirements of the New York State Department of Environmental Conservation (NYSDEC) 1992 Hazardous Waste Report.

The Decorative Specialties International, Inc. (DSI) facility has been determined not to be a RCRA LQG based on the following information:

a) The site reportedly did not generate or store in any single month, 1,000 kg (2,200 lbs) or more of RCRA or New York State hazardous waste.

b) The site did not generate or store in any single month, or accumulate at any time, 1.0 kg (2.2 lbs) of RCRA acute hazardous waste.

c) The site did not generate or accumulate at any time more than 100 kg. (220 lbs) of spill clean up material contaminated with RCRA acute hazardous waste.

Based on the above, the DSI facility is not required to complete and submit the NYSDEC 1992 Hazardous Waste Report.

II.B. Toxic Chemical Release Inventory Reporting (Form R)

Section 313 of the Emergency Planning/Community Right to Know Act requires that owners or operators of facilities that meet all of the following criteria submit a completed Toxic Chemical Inventory Report (Form R) to the USEPA (or designated agent for New York State, NYSDEC).

- The facility employs ten (10) or more persons on a full time basis.
- The facility is included in Standard Industrial Classification (SIC) Codes 20-39.
- The manufactures or otherwise uses any listed toxic chemical in quantities greater than or equal to the established threshold limit (10,000 pounds) in the course of a calendar year.

The DSI facility employs more than ten (10) persons on a full time basis and possesses a SIC Code of 2621. A review of the facility material safety data sheets (MSDS) and information provided by DSI representatives indicated that listed toxic chemicals were not used at the facility in quantities greater than or equal to 10,000 pounds.

Based on the above requirements and the review of the facility SIC code and MSDS', INTEX concludes that the DSI Company's Brownville, New York facility is not required to submit a Toxic Chemical Inventory Report (Form R).

II.C. Air Contamination Sources, Certificates to Operate

Article 19 of the New York State Environmental Conservation Law requires that the owners/operators of air contamination sources apply for and obtain certificates to operate.

Currently the DSI company is in possession of certificates (permits) for two (2) air contamination sources. The permits are for the #6 fuel oil package boiler emissions and the Kady Mill Dust Collection System. The permits expire on August 1, 1996.

During the facility inspection task of the compliance audit, INTEX observed several emissions points on the roof of the facility. The emissions points were identified as discharging from various paper drying units at the facility. Currently the NYSDEC does not require a permit for the discharge of steam from the drying units at the facility. Future regulations instituted by the state as a result of the implementation and enforcement of the United State Environmental Protection Agency (USEPA) Clean Air Act and Clean Air Act Amendments (particularly in areas designated as non-attainment zones for ozone and carbon monoxide), may require emissions testing and permitting of these emission points.

II.D. Notification of Hazardous Waste Activity/EPA Identification Number

In 1991, the DSI, Inc. company completed and submitted the USEPA Notification of Hazardous Waste Activity. The notification was reportedly made as a result of the installation of a self contained parts washer by Safety Kleen, Inc. The notification form requires that the facility identify those wastes generated at the site. The wastes identified on the 1991 Notification Form indicate that ignitable wastes (D001) are generated at the facility. Wastes containing benzene (D018) and/or tetrachloroethylene (D039) were also identified.

The USEPA has issued the identification number NYD0982188427 to the DSI facility. The identification number should be used on all hazardous waste manifests to properly identify the source of hazardous waste generated at the facility.

II.E. NPDES Permit for a Stormwater Discharge Associated with Industrial Activity

All facilities considered by the USEPA to be engaging in industrial activity (SIC Code Prefixes 20-39) are required to submit an application for a NPDES permit for a discharge of stormwater. Each facility, required to apply for a permit, can submit an application for either an individual permit, a group permit, or a general permit issued by the state (if available).

The DSI company (SIC Code 2621) is required to apply for a NPDES permit for the discharge of stormwater. At the time of inspection, DSI had filed the Notice of Intent (NOI) in compliance with the provisions of the New York State General Permit. In addition to filing the NOI, the facility is required to file a New York State Stormwater Pollution Prevention Plan with the local office of the NYSDEC. The deadline for filing the Stormwater Pollution Prevention Plan was February 1, 1994. Periodic discharge monitoring and implementation of the Stormwater Pollution Prevention Plan recommendations will be required to maintain compliance with the general permit.

II.F. SARA Title III/"Right To Know"/MSDS File

During the site inspection, INTEX reviewed the SARA Title III and "Right to Know" regulations applicable to the DSI facility. A review of the MSDS file was also completed during the site inspection.

The DSI facility personnel are required to complete annual "Right to Know" training. This training involves materials labelling, handling and storage instruction. The training includes instruction on interpreting the contents of Material Safety Data Sheets and concerns specific to on-site operations at the facility. At the completion of each training session, an exam is completed by each employee. A copy of the exam is reportedly placed in each employee's personnel file to document the completion of the required training. In addition to the "right to know" training, DSI officials report that CPR and first aid training are also periodically offered. It is reported that a minimum of one (1) person per shift has completed the CPR and first aid training.

OSHA regulations (29 CFR 1910) require all employees who handle or who work with hazardous materials and/or hazardous waste complete forty (40) hours of approved training. Supervisors of material handlers are required to complete an additional eight (8) hours of supervisory training. All such employees are also required to complete an annual eight (8) hour refresher course to update their certification. Upon completion of the required training, the employee should receive a Certificate of Completion for the company's records.

Current "Right to Know" regulations require employers to keep a record including the name, address and social security number of workers who handle or use hazardous (Subpart Z) substances. The records must be made available upon request to employees, their physicians or the State Health Department. A review of the DSI files indicate that the Subpart Z substances were identified at the facility.

II.G. Confined Space Entry Procedures

OSHA regulation 29 CFR 1910.146 requires that facilities implement a permit system for entry into confined spaces, designated as permit-required confined spaces (permit spaces), which pose special dangers for entrants because their configurations hamper efforts to protect entrants from serious hazards such as toxic, explosive or asphyxiating atmospheres. In accordance with the preceding regulations, DSI has initiated a confined space entry permit system. All persons, prior to entering a permit-required confined space, are required to complete both the necessary atmospheric testing, and the permit form.

II.H. TSCA Annual PCB Maintenance Logs

A previous environmental audit conducted at the DSI facility identified the existence of a small (unused) electric transformer at the site. A wipe sample collected from the transformer was analyzed and confirmed the presence of PCB's in the transformer oils.

Company personnel report that the transformer was recently disposed of by Allwash, Inc. of Syracuse, New York at an approved disposal facility. Copies of the New York State manifest documenting the proper transport and disposal of the transformer must be maintained at the facility.

Additionally, the manifest forms must be forwarded to the appropriate state and/or federal agencies. It was reported to INTEX that the copies of the manifest had not been forwarded to the regulatory agencies as of the date of the site inspection, but were forwarded prior to the date of this report.

Because PCB containing transformers no longer exist at the site and no other potential sources of PCB contamination were identified or reported, the DSI facility will no longer be required to update the annual TSCA PCB maintenance logs on an annual basis. The last entry in the log should be the documentation of the removal of the PCB's from the site. The logs should be maintained on file at the facility. PCB maintenance logs were not available for inspection at the facility.

II.I. State Pollutant Discharge Elimination System (SPDES) Permit/National Pollutant Discharge Elimination System (NPDES) Permits

On February 4, 1988, the facility applied for a New York State SPDES permit for a non-industrial, non-municipal discharge of an intermittent flow of between 10,000 and 100,000 gallons per day to the Black River. The discharge consists of the excess intake water flow from the holding tank (cistern) that overflows to the Black River.

The facility currently receives water from the Black River, which is treated on site, for use in the manufacturing processes. Water from the holding tank (cistern) is also used as non-contact cooling water. The non-contact cooling water is, after use, returned to the holding tank. The discharge of non-contact cooling water to the holding tank and subsequently to the Black River (waters of the state) requires that the facility be in possession of a SPDES permit. Currently, the facility is not in possession of a SPDES permit for the above referenced discharge. Reportedly, no notices of violation concerning this discharge were received by the facility as of the date of the site inspection. It was reported that an application for the discharge of non-contact cooling water was filed with the local (Watertown) office of the NYSDEC.

Steam condensate discharges were observed along the outside wall of the facility. The condensate was observed to drip/flow to the steep limestone bedrock and the Black River. No NPDES and SPDES permits were on file for these discharges. The steam condensate discharges should be included in the SPDES permit application for the discharge of non-contact cooling waters from the facility.

II.J. Spill Prevention Control and Countermeasures (SPCC) Plan

The Decorative Specialties International, Inc. facility developed a "Slug Discharge Prevention and Control Plan". The plan provides direction intended to minimize the possibility that the facility will release non-treated waste water to the POTW. The plan details the system of drains and treatment methods. It also includes emergency contacts at the site and direction to site personnel regarding appropriate reaction to spill situations.

Although the "Slug Discharge Prevention and Control Plan" was initially prepared to address the concerns of the local POTW during the discharge permitting process, the components of the plan also address the primary requirements of a Spill Prevention Control and Countermeasures (SPCC) plan.

II.K. Asbestos Inventory and Maintenance Logs

Asbestos containing materials were identified in the area of the old coal fired boilers during a previous environmental investigation at the facility. The asbestos containing materials were subsequently encapsulated at the facility by Allwash, Inc. of Syracuse.

Current regulations (12NYCRR, Part 56) require that facilities with asbestos containing building materials and asbestos abatement contractors maintain a record of all activities occurring on or after January 1, 1992, that have impacted the asbestos containing materials. Examples of typical site activities include enclosure, encapsulation, removal and other construction activities that directly impact the asbestos containing materials. The record must be kept for thirty (30) years and should include the following:

- The name, address and social security number of the project supervisor and all project workers.

- Location and dates of the project.
- Amount of asbestos containing materials impacted.
- Waste disposal sites, transporters and any TSDF's utilized.

A copy of the record should be kept on file at the facility.

It is required that an on-site record of the quantity and location of all asbestos containing materials be maintained to assist in evaluating if future site activities will impact areas of asbestos containing materials. At the time of inspection, no asbestos inventory and maintenance log was on file at the facility. Site personnel indicated that no activities at the site had impacted the asbestos containing materials in the area of the boilers. Site contacts indicated that the two boilers had been abandoned and that no work on the boilers has occurred.

III. FACILITY DRAINAGE SYSTEM

During the July 2, 1993 site inspection task of the facility compliance audit, INTEX inspected the series of drains and effluent system at the facility. Upon arrival, INTEX was supplied with an effluent system schematic (see Figure 1, pg. 17) for the entire facility.

A number of floor drains exist at the facility. Substantial quantities of water from various paper production processes are allowed to discharge to the facility floor. During the inspection, it was reported that the drains at the facility flow through a series of tanks and piping systems where the flow is tested for pH and temperature. The drains are reported to discharge to the POTW. The following areas of concern regarding the facility drain system were identified during the facility inspection:

Fourth Floor - Floor drains flow through trenches and gutters to the former slurry pit which is not sealed water tight.

Third Floor - Waste "white" water is discharged to the second level floor and is allowed to drain through an opening in the third floor ceiling to the two (2) effluent tanks. The wastewater is allowed to flow over the bedrock walls where it may discharge to and impact the local groundwater.

Third Floor - Roof and storm drains discharge to a flume-like floor trench behind the old boilers. The floor trench is not sealed from the local bedrock and is located in an area where petroleum products discharged to the floor in the past.

Second Floor - Air compressor condensation is discharged to the floor drain system. Evidence of oil leaks from the air compressors were observed on the floor in close proximity to the floor drains.

Second Floor - Wastewater from the saturator area drains down a bedrock wall to a floor drain through a hole in the ceiling. The wall and floor in the area of the drain is heavily encrusted with latex and coating materials. An oily sheen was observed on the floor of the facility outside the oil room. The oily sheen extended to an area where floor drains were present. Petroleum products stained the latex and the floor. Oil leaks from nearby compressors were observed on the floor in close proximity to the drain. The wastewater in the saturator area was reported to contain latex, rubberized coating, dyes and water.

First Floor - The floor drain, leading to equilization tank, is used as a containment mechanism in the materials storage area. Any spillage of raw materials is allowed to enter drain system.

First Floor - Drums of waste coating material were being punctured and discharged directly to the floor drains as a method of disposal.

First Floor - A trench floor drain is used as the method of containment in the chemical (acrysol/ammonia) storage area next to the Kady Mill.

Warehouse Building - A trench drain is present in the floor of the raw materials/drum storage area. The trench drain appeared to discharge outside the east wall of the storage building to the area of a dry creek bed which leads to the Black River. Any spill, leak or discharge in the vicinity of the drum storage area, would be released directly to the environment as a result of the presence of this drain.

Storm Sewer drain - A storm sewer manhole is located adjacent to the solid waste dumpsters. Clays recovered from the D.E. filter and latex saturated paper were observed in the dumpsters at the time of inspection.

IV. HAZARDOUS/NON-HAZARDOUS WASTE STORAGE AREAS

The DSI company, as a result of on going processes, has the potential to generate hazardous waste. RCRA and HSWA regulations require that areas used for the temporary (less than 90 days) storage of hazardous waste comply with construction and operational regulations 40 CFR Parts 262-265. INTEX inspected the hazardous waste storage area at the facility. The results of that inspection are summarized below:

The hazardous waste/waste storage area is currently located on the third floor of the facility. Fifty-five (55) gallon drums of waste were stored on the cement floor. The aged cement floor was not properly sealed. Large holes leading outside of the facility were observed along the wall. Cracks were also observed in the facility floor. One (1) gallon jars of waste were observed stored on a window ledge in the storage area. Specific area's designated to segregate the storage of reactive, ignitable or incompatible wastes were not present. Water was observed leaking into the storage area from overhead piping and from the ceiling. Unused equipment, carts, bins and containers were stored in the storage area and obstructed free movement within the room.

The following are general RCRA requirements for hazardous materials storage areas:

- A base must underlie the containers which is free of cracks or gaps and is sufficiently impervious to contain leaks, spills and accumulated precipitation until the collected material is detected and removed.

- The base must be sloped or the containment system must be otherwise designed and operated to drain and remove liquids resulting from leaks, spills or precipitation.

- The containment system must have sufficient capacity to contain 10% of the volume of the containers (cumulative maximum storage capacity) or the volume of the largest container, whichever is greater.

- Run-on of liquids into the containment system must be prevented.

- Incompatible wastes or incompatible materials must not be placed into the same container or containment area.

INTEX recommends that a hazardous waste storage area be constructed at the facility. The storage area should be constructed in the following manner:

1) Select a location for the storage area.

   - The area should be located such that access to each storage containment is possible by forklifts or other such vehicles needed to facilitate the transport and handling of the waste containers.

   - The basement of the facility should be eliminated from consideration as a location of the hazardous materials storage area as extremely stringent regulations pertain to storage areas prone to flooding.

   - The storage area should be located such that leakage from pipes, precipitation and process waters cannot enter or impact the area.

   - The location selected must be sized sufficiently such that the waste generated at the facility during each ninety (90) day period can be properly stored within the confines of the storage area without overflow.

2) Construction of the storage area.

   - A sloping base should be constructed for the floor of the storage area. The base should be free of cracks, seams, holes and gaps. An acceptable material for the construction of a storage area base is a "single pour" concrete slab equipped with side wall berms sized such that a minimum of ten percent (10%) of the maximum storage capacity can be contained within the base. Access to the base interior should be constructed as ramped walkways and/or vehicle ramps.

   - The floor/base of the storage area should be made impervious to contain any leaks and spills that may occur. The floor/base should be painted with a penetrating sealing paint or an epoxy/resin based sealant should be used.

- Additional storage compartments should be constructed to separate and contain ignitable, reactive and incompatible wastes. Each compartment should be separated by an impervious berm and clearly labelled.

- The storage area shall be constructed with at least two (2) means of egress and self-closing, non-combustible doors equipped with panic hardware. The size of the storage area shall not exceed five hundred (500) square feet in area.

3) Additional Equipment

- Fire extinguishing equipment (fire extinguishers and/or ansul system), and spill collection and containment equipment (speedi-dry, absorbant pads and absorbant booms), should be readily available for use in the storage area.

- Appropriate personal protective equipment should also be available for use by trained (40 hr. OSHA hazardous materials handlers training course), on-site personnel in the event of a spill, leak or discharge.

- Emergency contacts and/or a copy of the facility spill prevention control and contingency plan should be readily available in the storage area for easy reference.

- Atmospheric monitoring equipment should be readily available to monitor the storage area for explosivity and the presence of airborne contaminants.

- The storage area should be equipped with adequate lighting using explosion proof fixtures.

Note: A storage cabinet located immediately adjacent to the storage area can be used to store much of the above equipment. Additional equipment should also be stored in an area remote from the waste storage area in the event a spill impacts the area of the equipment storage cabinet.

Note: Additional local construction and/or safety requirements may apply beyond the general state and federal regulations listed above.

V. MATERIALS STORAGE AREAS

Several raw materials storage areas were identified during the site inspection portion of the facility compliance audit. The primary storage areas identified were the oil room, ramp room paint storage cabinet, lube oil storage area, dye/ink storage room, water treatment area, first floor materials storage area, Kady Mill chemical storage area and coating area storage. In addition to the previously listed storage areas, a large portion of the warehouse building on the east of Route 12E is used for the dry storage of drums of coating material. Individual drums of various raw material compounds were also stored at various locations throughout the facility. The INTEX findings are listed below:

V.A. Oil Room

The oil room is located on the second floor of the facility. It is the location where containers of lubricating oils, hydraulic fluid, greases and equipment maintenance fluids are stored. Fifty-five (55) gallon drums of different viscosity lubricating oils were stored on their sides supported by cradle racks. Each drum was fitted with a spigot and movable catch basin/bucket. Smaller containers of grease oils and cleaners were stored along the opposite wall of the room.

An overflowing pail of grease, waste oils and fluids were observed stored on the floor. A steel, approximately 250 gallon, bulk storage tank was supported overhead at the back corner of the room. The tank piping was observed to be leaking oil to the floor of the room.

No secondary containment structures were observed in the oil room. The floor of the oil room was heavily stained with oils and fluids. An oily dirt build up was also present on the floor. An oily sheen was observed on the floor of the facility outside the oil room. The oily sheen extended to an area where floor drains were present.

V.B. Ramp Room Paint Storage Cabinet

A small paint storage cabinet was present along the wall of the ramp room. The paint storage cabinet was closed and properly labelled to indicate the contents. A number of containers of paint were stored on the floor and work bench outside the paint cabinet because the cabinet was full. No floor drains were observed in this area.

V.C. Lube Oil Storage Area

Several drums of lube oils (DTE-25, gear lube, 10W-30, HD80-90) were stored on cradle rack systems in the area immediately outside the oil room on the second floor of the facility. Seven (7) additional drums were temporarily stored on pallets in the area. Each drum was fitted with a spigot and/or hand pump while in use. No secondary containment structures were present in the area. The floor in the lube oil storage area was heavily stained and encrusted with an oil/latex/soil build up. The base of the bedrock walls located behind the drums of lubricating oils was stained. Oils may adversely impact the local groundwater if discharged to the bedrock.

V.D. Dye/Ink Storage Room

The dye/ink storage room was recently reconstructed during a facility improvement program. A sloping cement floor with cement secondary containment berms was constructed within the room. Sloping ramp ways were constructed to assist with equipment access. A floor drain was recently removed and filled with concrete. The inks/dyes stored in this area were segregated and were reported to be non-aniline type dyes.

A large crack was observed in the floor of the storage room. Several smaller cracks were observed in the berm. The recently replaced steel grate outer form extended to the surface of the floor. The steel outer frame of the grate may act as a conduit to transport contaminants along the cement/steel interface. An effective (penetrating or epoxy based) sealant was not applied to the floor and berm at the time of the investigation.

V.E. Water Treatment Area

Water from the Black River is used in various facility processes. Prior to use, the river water is treated to adjust the chemical and/or biological characteristics of the water for compliance with manufacturing specifications. Automated chemical feed pumps inject a solution of sodium hypochlorite ($NaHClO_3$) into the river water intake as a bacterial disinfectant. The sodium hypochlorite solution is stored in polyethylene totes (approximately 250 gallons each). The totes are currently stored on pallets located on the facility floor.

Minor encrustations of sodium hypochlorite were observed on the floor. No secondary containment structures were observed in the water treatment area or in the areas used for the storage of the totes prior to use.

The totes are sized such that registration of each vessel is not required under 6NYCRR, Part 596 regulations (Registration of Hazardous Substance Bulk Storage Tanks); however, the reporting, response and corrective action requirements of 6NYCRR, Part 595 (Releases of Hazardous Substances - Reporting, Response and Corrective Action) will apply should a reportable quantity (100 lbs.) of this material be released. Large quantities of sodium hypochlorite should not be allowed to discharge to the treatment system. Treatment for pH may be interrupted at the facility and POTW effluent standards for sodium, chlorides and pH may be exceeded if this material is discharged to the on site treatment system and POTW.

A secondary containment structure should be constructed in the water treatment area and in the area used to store the totes of sodium hypochlorite.

V.F. First Floor Materials Storage Area

The first floor materials storage area is located parallel to the paper saturator, rollers and dryers. Several drums and totes of raw materials and chemicals are stored on the gently sloping floor, over and adjacent to a floor trench drain. The trench drain was observed to discharge, on one end, to a vertical manway. Should a release occur, the trench drain (intended to act as a containment device), would transport the spilled materials, via a series of drains, to the on-site equalization tank and treatment system. The drainage system was observed to flow over exposed outcrops of the local bedrock which comprises portions of the walls and floors of the facility.

The potential exists for the local groundwater resources to be adversely impacted if a spill should occur and chemicals are allowed to contact the groundwater via fractures in the bedrock.

V.G. Kady Mill Chemical Storage Area

A number of 55-gallon drums and 5-gallon pails of chemicals (acrysol, polyethylene and ammonia) were stored on pallets in the vicinity of the Kady Mill. A small berm was present in the floor surrounding the Kady Mill and the drums. A large trench drain was located in the drum and pail storage area. A drum of "Foamaster NXZ" was stored on top of the trench drain that traverses the front of the area. It is reported that the trench drain discharges to the equalization tank for treatment prior to discharge to the municipal waste water treatment facility. The floor of this portion of the facility was observed to be sloped towards the trench drain.

V.H. Coating Storage Area

Approximately thirty (30) pallets containing lined cardboard drums of various paper coatings were stored in the coating storage area. The pallets were stacked two (2) or three (3) levels high along the outer walls of the room. The cement floor sloped towards a floor drain. Several drums of waste coatings were stored adjacent to the floor drain. Site personnel were observed puncturing the drums of waste coating and allowing the liquid to discharge to the floor drain. It was reported that the drain discharged to the equalization tank where the waste water was treated and the turbidity removed.

V.I. Warehouse Building

The warehouse building is located on the opposite (east) side of Bridge Street from the main facility. The building was constructed with a cement floor, brick walls and wood framed roof. Large cracks were observed in the building floor which slopes towards a floor drain. Several hundred drums of raw materials (paper coatings) were stored in the building. The drums were stored on pallets and were stacked three (3) to four (4) tiers high. Several drums were observed to be dented, but not leaking. No berms or segregated storage of the raw materials was observed. Large rolls of finished paper and pallets containing eighty pound (80 lb.) bags of clay and starch were also stored in the warehouse.

The floor drain was observed to discharge outside the east wall of the building. A small intermittent stream is located adjacent to the east side of the warehouse. The stream discharges to the Black River (approximately 40 ft. from the drain outfall).

VI. PETROLEUM BULK STORAGE TANKS

An 18,500 gallon petroleum bulk storage tank is present inside a tank vault at the northern center of the facility building. The heated storage tank is constructed of welded single wall steel construction and contains #6 heating oil. The tank is supported on a rack/cradle system which is located on a poured cement floor. The tank fill port is located outside the building at ground level. The fill piping runs overhead through the tank vault. The piping is constructed of threaded steel sections. The tank and piping are coated with paint to prevent corrosion.

A poured cement floor was constructed in the tank vault. The side walls of the tank vault slope inward at the bottom and are constructed of poured concrete. The east tank vault wall is constructed of cinder blocks and mortar that extends to a height of approximately two and one-half feet (2-½') above the floor. A sealer was not present on the walls or the floor of the tank vault at the time of inspection. A seam was observed at the base of the northern wall of the tank vault. Plastic sheeting extended through the concrete floor from below the wall. The void created by the sheeting may provide a conduit for the flow of oil to the environment should a leak or spill occur.

The boiler oil heating and pump unit is located in a bermed area adjacent to the tank vault. Several pipes leading to the underlying floors were observed in the concrete floor of the bermed area. None of the holes provided for the piping was sealed. Petroleum compounds were observed on the floor within the berm area. Petroleum was observed to be discharging to the voids surrounding the piping.

A spill of petroleum was reported to the NYSDEC on October 10, 1991, by the Decorative Specialties International Company (Spill #9107640). The spill occurred as a result of leakage occurring from overhead fill piping. A limited amount of contaminated soil inside and outside the tank vault was excavated and removed for disposal. INTEX is currently conducting a groundwater quality investigation as part of a site remediation plan. To date, groundwater contaminants (petroleum compounds) have not been detected in any of the groundwater samples analyzed. The remediation actions at the site are being completed with NYSDEC oversight and approval.

VII. SOLID WASTE DISPOSAL

Non-hazardous industrial solid waste is generated at the DSI facility as a result of the manufacturing operations at the site. Various waste papers and trash are discarded to a dumpster adjacent to the delivery driveway and loading platform located on the north side of the facility in the area of Bridge Street. Waste fiber sludges generated by the DE filter system are also dried and placed in the dumpster.

The roll off style dumpster is supplied to the DSI facility by the Company's solid waste removal contractor, Laidlaw, Inc. The waste removal contractor maintains the dumpster and transports the industrial solid waste to the municipal landfill (Solid Waste Management Facility, Rodman, New York). Periodic monitoring of the waste stream is conducted by the facility to maintain compliance with their waste stream disposal approval. Monitoring is conducted to characterize the waste sludge material for leachable toxic metals, volatile organic compounds, semivolatile organic compounds, herbicides, and pesticides. The analysis of the waste is performed by a New York State approved laboratory.

The most recent waste stream analytical results indicated the presence of 0.056 mg/l benzene in the waste sludge. A review of the available material safety data sheets for compounds present at the facility did not specify the presence of benzene. However, several MSDS's reported the presence of petroleum distillates and propriatory additives which may contain benzene. Interviews with key site personnel indicated that the source of the benzene is unknown. It was reported that only non-analine inks were used in the manufacturing process.

A review of the facility's notification of hazardous waste activity (EPA ID number application form) document indicates that the facility generates characteristic ignitable waste containing benzene and tetrachloroethylene.

Additional wastes are generated at the site. A self contained parts washer is located in the ramp room/maintenance area. The cleaning solvent used in the parts washer is reportedly recycled by the Safety Kleen Company. Waste oil drained from equipment during servicing and maintenance is reportedly recycled.

A sizeable depression was observed in the northern portion of the property. A large quantity of material appeared to be recently placed to fill the area. In addition to the more recent material, older fill material was observed in the area. The recently placed fill was composed of non-contaminated sand, concrete and a minor amount of asphalt material. The sand, concrete and asphalt material was placed as backfill at this site in accordance with the 6NYCRR, Part 360 regulations for the landfilling of reportedly non-contaminated construction and demolition fill items. The surface of the older fill material was observed to contain bricks, wood, stone, soil and metal objects. The fill material was observed not to comply with the 6NYCRR, Part 360 exemption for the landfilling of non-contaminated construction and demolition materials. The Part 360 exemption does not allow for the landfilling of lumber and metal objects such as the galvanized piping and sheet metal observed in the fill. The exact composition of the subsurface fill is unknown. The age of the older fill material was unknown. The older fill material may be exempt from regulation under current statutes as the material may have been placed as fill prior to the adoption of the regulations.

VIII. CONCLUSIONS/RECOMMENDATIONS

Pursuant to the findings of the facility compliance audit conducted at the DSI facility in Brownville, New York (listed below), INTEX submits the following recommendations:

1) Several raw materials storage areas were observed to be located adjacent to floor drains. Additional raw materials storage areas and waste storage areas were located in areas with potential discharges to the environment (cracks in floors, drains leading outside the facility building).

   - To comply with RCRA waste storage requirements, INTEX recommends that raw material and waste storage areas be constructed such that all materials can be properly segregated by chemical characteristics, physical properties or hazard type. The storage areas should be constructed as described in Section IV of this report.

2) The subsurface composition of the older construction and demolition fill material placed in the depressed area north of the facility is unknown.

   - To verify compliance with 6NYCRR, Part 360 solid waste regulations, INTEX recommends that the subsurface composition of the fill material be evaluated to determine if items posing a potential future environmental liability were placed in the fill at the site.

3) The tank vault housing the 18,500 gallon #6 fuel oil storage tank was inspected. Voids were observed between the floor and walls of the secondary containment structure that may, in the event of a spill, allow the discharge of petroleum to the environment. The concrete surfaces of the secondary containment structure were not covered with a paint sealer or water tight sealant.

   - To comply with federal (40CFR, Part 280) and state (6NYCRR, Parts 612-614) petroleum bulk storage regulations, INTEX recommends that the voids in the petroleum bulk storage tank secondary containment structure be properly sealed to prevent the possible leakage of petroleum to the environment. The surfaces of the secondary containment structure should be painted and/or sealed to prevent the absorption and migration of petroleum compounds in the event of a leak or spill.

4) Benzene was detected in the solid waste stream characterization analysis. Interviews with key site personnel and a review of available MSDS forms did not identify benzene as a constituent of compounds used at the facility. Benzene was listed on the Notification of Hazardous Waste Activity Form as a constituent of the hazardous waste produced at the facility. The source of the benzene detected in the sample is currently unknown.

   - INTEX recommends that samples be collected from the waste sludge generated at the facility to confirm or deny the presence of benzene. If benzene is detected in the additional waste samples, the source of the benzene should be determined. In accordance with RCRA regulations, the proper characterization and disposal of the waste is dependent upon the chemical composition, the source and the processes generating the waste.

5) The system of floor drains and treatment system wastewater were inspected. Several locations were observed where wastewater was allowed to flow over bedrock surfaces (that formed sections of the walls of the facility). Accumulations of latex material were observed heavily coating the bedrock walls.

- To comply with RCRA regulations and maintain compliance with New York State water quality regulations (6NYCRR, Parts 700-705), INTEX recommends that the system of drains be rerouted or reconstructed to eliminate the contact of waste waters with the bedrock outcrops in the walls of the facility. Wastewater contacting the bedrock may migrate potentially impacting the groundwater resources at the site.

6) Asbestos containing materials in the area of the two unused boilers were encapsulated by a licensed asbestos abatement contractor. An asbestos inventory/maintenance log was not available for review at the time of inspection.

- To comply with the 12NYCRR, Part 56 asbestos regulations and SARA Title III regulations, an asbestos inventory/maintenance log should be maintained at the site to document all potential exposures to asbestos. The log should contain a listing of the location of any asbestos containing materials remaining at the facility. The log should also contain a list of all persons involved in maintenance activities that directly impact the asbestos containing materials. All pertinent information regarding the maintenance personnel and activities should be listed (name, address, position with the company, maintenance activity performed, project/shift supervisor, date of potential exposure). A copy of the asbestos inventory/maintenance log should be kept on file at the facility for a period of thirty (30) years. If no maintenance activities have directly impacted the asbestos containing materials, the log should be kept as a record of the locations where asbestos containing materials are located at the facility with a blank (no entries) summary of maintenance activities.

  To comply with TSCA regulations and SARA Title III regulations, an identical log should be maintained at the facility to document the presence of PCB's and any maintenance activities directly impacting the PCB's.

7) The DSI facility had reportedly applied for a SPDES permit (from the NYSDEC) for the discharge of non-contact cooling water. Additional steam condensate discharges were observed discharging to the area of the Black River.

- To comply with New York State water quality regulations (6NYCRR, Parts 700-705), the facility should obtain a SPDES permit (re-application may be necessary) from the local NYSDEC office. The permit should also include provisions for the discharge of steam condensate to the Black River.

8) Heavy staining and petroleum products were observed on the floors of the oil storage room and lube oil storage area. No secondary containment structures were observed in the storage and/or transfer areas.

- To comply with the Village of Brownville sewer permit, 6NYCRR, Parts 612-614 petroleum bulk storage regulations and New York State Navigation Acts, INTEX recommends that the floors in the oil storage room and lube oil storage area be cleaned of all free petroleum products to prevent the migration of petroleum compounds to the system of drains located within the facility. Secondary containment structures should be constructed to enclose the storage areas and/or transfer areas. Smaller, moveable secondary containment structures should be constructed for use when individual drums are used to supply chemicals and/or lubricants to a specific portion of the facility. The secondary containment structures should be large enough to contain leaks or spills from spigots or pumps during the transfer of materials.

9) Large totes of sodium hypochlorite solution were observed to be stored in the water treatment area. The floor of the area was covered with an encrustation of the water treatment chemicals. No secondary containment structures were observed.

- To comply with the chemical bulk storage regulations (6NYCRR, Parts 595-597), INTEX recommends that a properly sized secondary containment structure be constructed to house the totes of water treatment chemicals while in use. Additional secondary containment structures should be constructed for the storage of totes of reserve water treatment chemicals prior to use.

10) Leaks of petroleum and heavy staining were observed in the area of the fuel oil heating system and pump. Voids leading to the lower levels and exterior of the facility were observed within the secondary containment structure in the areas surrounding pipes and conduit.

- To comply with Title 17 of the New York State Conservation Law and 6NYCRR, Parts 612-614 of the petroleum bulk storage regulations, INTEX recommends that the free petroleum products be cleaned from the equipment and floor area surrounding the oil pump. The voids in the secondary containment structure should be sealed to prevent the discharge of petroleum products to the lower levels and/or outside of the facility.

11) Hazardous materials and hazardous wastes are reported to be stored and handled at the facility. All persons involved with the handling of hazardous materials reportedly had not completed an approved hazardous materials handler's course in accordance with OSHA regulation (29 CFR 1910).

- To comply with current OSHA regulations, INTEX recommends that all workers that handle hazardous materials complete an approved hazardous materials handler's training course.

12) The DSI Company has submitted the Notice of Intent for coverage under the New York State General Permit (NPDES Permit for a Stormwater Discharge Associated with Industrial Activity). A provision of the New York State general permit is that a Stormwater Prevention Plan be prepared for the facility prior to February 1, 1994.

- To comply with the provisions of the Clean Water Act (CWA) and the NPDES program, the DSI Company should prepare a Stormwater Prevention Plan in accordance with the requirements of the New York State general permit. The plan should be prepared to attain compliance with current regulations.

APPENDIX 48

1991 ICF Kaiser Engineers Environmental Assessment Report

MPR

ENVIRONMENTAL ASSESSMENT OF JAMES RIVER–SPECIALTY PAPER DIVISION DOMESTIC FACILITIES

Revised Draft Report

Prepared for: **Fried, Frank, Harris, Shriver & Jacobson**

On Behalf of: **AEA Investors, Inc.**

February 12, 1991

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4.5 BROWNVILLE, NY

4.5.1 Overview of Operation

The James River Brownville, facility (JR-Brownville) is located along Bridge Street in the southern section of the Village of Brownville, NY. The site consists of approximately 100,000 square feet, as well as a satellite property, located off of Maple Street. Both properties are owned by the James River Corporation. The satellite property is an undeveloped lot that was formerly used by the mill as a loading/unloading area associated with an adjacent railroad track. Currently, the railroad track is abandoned and has been dismantled, and the satellite property remains undeveloped.

The facility manufactures various grades of paper, including latex-saturated book cover, clean room paper, oil filter grades, decorative products grades, and a variety of other specialty grade papers. Paper pulp, which is delivered to the mill, is combined in beater tanks with water to form a slurry. This slurry is then pumped onto the paper machines, where it is dried and pressed to form paper. If the paper is to be coated with latex, the sheet is sent through a trough that contains latex, then dried and pressed. Some grades of paper require a clay coating, which is applied after the sheets are formed by sending the paper through a trough that contains a clay and water mixture. The paper is dried and pressed. After the coatings have been applied, the paper is rolled and sent to the trimming area, where it is unrolled, the edges trimmed, and then rerolled. Following trimming, the rolls of paper are moved to storage for subsequent shipping. Approximately, 10 percent of the mill is used as office space, another 40 percent is used for storage and the remaining 50 percent is used for manufacturing paper.

The steam used in the manufacturing processes and in heating the building is generated by two boilers that burn both fuel oil and natural gas. The facility is equipped with a sprinkler system, a direct alarm to emergency services, and a water tower. There appeared to be an adequate supply of fire extinguishers and first aid stations located throughout the mill.

The facility is located in the Village of Brownville, NY, approximately 100 miles north of Syracuse, NY. The Black River is adjacent to the southern and western boundaries of the site. A creek bed is located on the site just north of the building. When fluid enters this creek bed, it discharges to the Black River. Directly northwest of the facility is the Village of Brownville Wastewater Treatment Works. North of the site is a mixed residential/retail area (Brownville's Main Street). East of the site is undeveloped property and the Black River. Across the Black River south of the site is another paper mill, owned by Boise Cascade, which has been shut down since 1988.

The building was constructed in the 1890's, after a fire destroyed the previous mill located on the site. The previous mill, constructed in 1814, operated from 1814 until 1888 as a cotton/textile factory. During this time, the mill changed owners as many as twenty times. In 1888, the mill was sold to Cornell Box Company and started being used for paper/box manufacturing. After the 1890 fire, the mill, which was owned by Samual Upham at the time, was rebuilt and continued operations as a paper mill. In 1973, the mill was closed owing to financial difficulties and then sold to Premoid Corporation. The James River Corporation purchased the mill from the Premoid Corporation in 1986.

4.5.2 Summary

The most significant issue at the JR-Brownville mill is the complaint between the Village of Brownville, NY, and JR-Brownville regarding the possible need for JR-Brownville to pretreat wastewater prior to discharging it to the Village's Wastewater Treatment Plant. Another significant issue is the manhole located north of the mill that appears to have a continuing problem with overflows.

4.5.3 Environmental Management

The resident manager for the mill is Mr. Nicholas Arvan. He is responsible for overseeing all mill operations. The environmental manager for JR-Brownville is Mr. Steven Snook, who also oversees environmental issues at the JR-West Springfield facility. The environmental staff for JR-Brownville includes Mr. Joseph Litsermeyer, Plant Engineer and Radiation Officer; Ms. Sandy Mercuri, Technical Superintendent, who is responsible for all environmental issues except for the nuclear program; and Mr. Randy Shear, Health and Safety Manager.

4.5.4 Air Pollution and Asbestos Control

JR-Brownville currently holds one air permit for the two facility boilers. The permit expires in June 1991 and requires that the mill burn fuel that has less than 1.5 percent sulfur content. However, analysis of the oil recently delivered to the facility indicated that historically the fuel had a sulfur content of 1.8 percent. Although burning the oil with the 1.8 percent sulfur content is a violation of the facility's air permit, there have been no violation notices issued by any regulatory agencies. According to Nick Arvan, the facility has since corrected the practice, and a recent analysis of fuel oil samples indicate the sulfur content is below 1.5 percent as required by the facility's air permit.

Asbestos. During the September 11, 1990, site visit, ICF KE staff observed ACM, specifically, pieces of insulation and powdered cement being stored in open bins and containers in the basements of the mill. There was approximately 5 cubic yards ACM total, which was not bagged or labeled. This ACM was also located within areas where unauthorized access was possible. Asbestos removal and disposal would cost approximately $3,000-$5,000.

The facility has encapsulated or removed deteriorating ACM from the site. ICF KE did observe deteriorating ACM within the facility buildings that remains on pipes and on two out-of-service boilers. The deteriorating ACM insulation could be addressed for approximately $6,000.

4.5.5 Water Supply and Pollution Control

The mill is serviced by Village water and sewer. The mill obtains potable water from municipal water supplies. In these cases, responsibility for maintaining water quality falls to the municipality.

The Brownville, NY, facility discharges wastewater, both sanitary and industrial, to the municipal sewer system and does not have on-site septic systems.

Currently, there is a complaint between the JR-Brownville and the Brownville POTW. This complaint involves a change in the formula used to calculate the mill's fee for treatment of their wastewater effluent. Since 1979, the mill has reduced total flow by 90 percent with a 60 percent reduction in solids concentration. The POTW claims that the more concentrated wastewater adversely effects the POTW's treatment efficiency. Therefore, the POTW wants the facility to pay more for treating the mill's wastewater. In addition, the POTW wants the mill's wastewater to be pre-treated prior to discharge to the POTW. Reportedly, the POTW is under a Consent Decree with the New York State Department of Environmental Conservation that involves activities regarding management of the POTW, specifically the timely removal of sludge from POTW holding tanks. JR-Brownville personnel believe that if the POTW was run correctly (i.e., sludge was removed more frequently), then the POTW would have no problems with the mill's wastewater, and therefore the mill should not have to pre-treat their wastewater. There was a study performed on the sewage discharge from the facility. Currently, monitoring and testing is continuously performed on sewage discharge that is sent from the mill to the Village Wastewater Treatment Works.

The facility and the POTW are reportedly close to settling the payment formula issue; however, the pre-treatment issue is still unresolved. The new payment formula involves calculating the facility's fee based on flow, solids content, and BOD. Settlement of the complaint ($462,780) may involve triple damages ($1,388,396) in addition to higher fees (both past and future) based on the new payment formula. JR-Brownville has budgeted $100,000 to cover potential past payments to the Village as part of the new formula.

According to Nick Arvan,[5] the Village is now under a consent order from the New York Department of Environmental Conservation (NYDEC). The Village hired Burnier and Peck (BP) to make recommendations on correcting the discharge violations from the POTW. BP has completed a report that includes a recommendation for JR-Brownville to pretreat their effluent to reduce suspended solids in the mill effluent from its current 1,300 ppm level to 350 ppm. This would essentially require JR-Brownville to install a filtration system or sedimentation basin to meet these discharge limits. The Village is currently awaiting NYDEC's response to the BP recommendations. JR-Brownville has an escrow account of $115,000 for anticipated back charges by the POTW for treating the mills wastewater effluent.

On February 4, 1988, JR-Brownville applied for an NPDES permit for nonindustrial, nonmunicipal discharge of irregular, intermittent flow between 10,000 and 100,000 gallons per day to the Black River. This discharge flow represents the excess intake water from the Black River attributable to the overflow from the holding tank where the facility takes in water from the Black River. The facility uses treated water from the Black River in the manufacturing processes. The NPDES permit is still pending. In addition to the permit, the facility has requested that it be exempt from testing the discharge (required in Item IV of EPA 2e). The facility expects to resubmit the permit after additional, more comprehensive analysis of the discharge further defines the volume and chemical composition.

Currently, even though the NPDES permit has not been approved, the facility is discharging the excess intake water into the Black River. The facility has not received any violations from any regulatory agencies concerning this discharge.

[5]Telephone conversation with Neil Ram, ICF KE, Jan. 1991.

There are several unpermitted discharges of steam condensate from process water that discharge into a creek bed located north of the mill building. Water entering this creek bed discharges to the Black River. The facility may need to obtain an NPDES permit for these discharges.

During the September 11, 1990, facility inspection by ICF KE, several floor drains were observed in the building that reportedly are connected with the facility's sewer line that discharges to the Village wastewater treatment plant (POTW). ICF KE observed a storm drain in the driveway of the loading area. Rainwater from the driveway flows into this storm drain. Reportedly, this storm drain discharges to the creek bed located north of the mill building. Under the new stormwater regulations, JR-Brownville will need to apply for a stormwater NPDES permit for this discharge.

There is a wastewater manhole located north of the mill building, where ICF KE observed evidence of a recent wastewater overflow. This manhole was in poor condition, as evidenced by visible cracks in the cement. A past wastewater overflow incident from this manhole was reported to the New York Department of Environmental Conservation. The facility installed an alarm system to alert personnel to future overflows. The cause of the wastewater overflows is unknown, however, it may be related to backup from the POTW or from the poor construction of the manhole.

According to Nick Arvan, discharge of wastewater onto the ground from the manhole on the north side of the mill continues to occur. The most recent discharge occurred on December 15, 1990, when about 10 gallons of mill effluent was discharged onto the ground. The mill attributed this discharge to backup from the POTW caused by latex clogging the treatment plant pump. The paper mill was reportedly not operating at the time of the spill. This is an ongoing problem and will most likely not be resolved until the Village implements engineering improvements to the POTW.

4.5.6 Hazardous Waste Management

JR-Brownville is a small quantity generator of waste oils and solvents (petroleum naphtha) (USEPA ID No. NYD083276055). Generated wastes are reclaimed or properly disposed of by Safety-Kleen.

4.5.7 Solid Waste Management

The facility reportedly has a recycling program to recycle as much paper product as is possible through its own manufacturing processes. Solid waste is discarded into a large receptacle (approximately 20 cubic yard capacity). Latex-saturated paper that is discarded in this manner has reportedly leached dyes and latex occasionally onto the asphalt beneath the receptacle, which then drains to a storm drain in the driveway. This storm drain discharges to the creek bed located north of the mill building. Facility representatives stated that since the time of the ICF KE visit, a drain has been connected beneath the receptacle to the wastewater effluent system, which flows to the POTW.

4.5.8 Underground Storage Tanks

JR-Brownville does not own or operate any USTs, and according to Steve Snook and Nicholas Arvan, never has. As a result, there do not appear to be any compliance or liability concerns in this area.

4.5.9 Material, Products, and Pesticide Storage

Fuel oil is stored in an aboveground storage tank, with an approximate 20,000-gallon holding capacity. This tank is contained within a vault, formerly used to store coal.

JR-Brownville uses an outside contractor (Orkin Pest Control) to apply pesticides for rodent control.

The facility has two radioactive sources, which are properly permitted and maintained.

JR-Brownville maintains MSDSs for all chemicals used at the facility. The chemicals being used or stored at the facility are either below reportable quantities or are not extremely hazardous substances under Section 302 of SARA Title III. The facility has five aboveground storage tanks used to store water treatment chemicals and fuel oil. However, there do not appear to be any compliance or liability concerns with regard to these tanks.

The facility has approximately 30 drums of waste oil/sorbent material that was used to clean up a previous fuel oil spill. In addition, several uncovered and unlabeled pails of waste oils and containers (some labeled) of obsolete chemicals were observed by ICF KE in the basements of the mill building. Improved housekeeping practices could be made at nominal cost.

There are 20 drums of spoiled latex or spoiled latex mixed with sawdust that are being stored at the facility. The drums of the latex-sawdust mixture had previously been disposed of with the solid waste. However, the solid waste contractor (Laidlaw) will not accept these drums unless each drum is sampled and analyzed (TCLP analysis). Currently, the facility is researching other options.

4.5.10 PCB Inventory Management

JR-Brownville has no reported PCB-containing transformers. All transformers are listed as being "dry type" transformers, indicating that they do not contain oil. However, one old out-of-service transformer (identified as No. 4) was observed by ICF KE in the basement and could contain oil. All capacitors that were manufactured prior to 1987 were disposed of by Transformer Services, Inc. (USEPA ID No. NHD018902874), and sent to Rollins, Inc. (USEPA ID No. TXD055141378), where they were incinerated.

There are three large transformers that are owned by Niagara-Mohawk in a power substation located north of the mill building. According to Mr. Arvan, JR-Brownville plans to purchase the electrical substation from Niagara-Mohawk at a cost of about $100,000. Under the terms of this sale, Niagara-Mohawk will remove the three transformers that are PCB-free (contain less than 50 ppm PCBs).

4.5.11 Past Disposal Practices

On-Site Disposal. According to Nicholas Arvan, the JR-Brownville Mill Manager, there has been no land disposal of wastes or dumping at the Brownville, NY, facility. During ICF KE's site inspection, a floor about 15x10 feet in area was covered to several inches in depth with oil and sorbent material. This room is located beneath a room where a fuel oil pump, used to supply fuel oil to the boilers, had leaked for many years. Reportedly, a hole was made in the floor to allow the oil to drain into the room below. During a followup telephone conversation with Nick Arvan, ICF KE was informed that the oil spill that had leaked onto a basement floor has been cleaned up. The oil/sorbent material is currently drummed and being stored for future disposal.

According to Michael O'Hara, one of the facility foremen, JR-Brownville personnel poured waste kerosene that had been used to clean machine parts into floor drains prior to 1989. The floor drains discharge to the facility sewer system, which ultimately discharges to the POTW.

Off-Site Disposal. A summary of sites used for past and present off-site disposal of hazardous wastes and the status of each site in the U.S. EPA CERCLIS data base is presented in Exhibit 4-5. As illustrated, one of the sites used by JR-Brownville is not listed on CERCLIS. The Rollins Environmental facility is listed on CERCLIS; however, according to a conversation with an EPA Region VI representative, EPA plans no further investigation or remedial action at the site. The Transformer Service Inc., facility in Concord, NH is a NH-lead site, with a site investigation performed by the State in 1988. According to JR-Brownville representatives, the facility has not received notification of any responsibility at the Transformer Service Inc., facility.

4.5.12 Occupational Safety and Health

The JR-Brownville facility's health and safety program consists of the following elements:

- A pre-employment physical and annual hearing tests;
- Monthly safety meetings that involve discussion of accidents and near misses that have occurred at the facility within the previous month, safety incentives and a monthly training topic (e.g., knife safety, fire extinguisher);
- Safety issues handouts are inserted in employees' pay envelopes;
- A safety committee consisting of all eight managers and five operations personnel; and
- Maintenance of accident report and investigation forms.

Based upon results from a noise study performed at the facility (by Aires Environmental Services, Ltd., 1989), the entire manufacturing area is considered an area where hearing protection is mandatory. Hearing protection (foam ear plugs) is provided to all employees and visitors.

EXHIBIT 4-5

CERCLIS STATUS OF WASTE DISPOSAL FACILITIES AND SURROUNDING AREAS
JAMES RIVER—BROWNVILLE, NEW YORK

Facility	CERCLIS Status	Comments
Rollins Environmental Services of Texas Deer Park, TX	DS, PA, SI Closed	—
Transformer Service Inc Concord, NH	DS, PA, SI, Active	A preliminary assessment was conducted at this site by U.S. EPA in 1980. The facility is now a NH-lead site, with a site investigation performed by the State in 1988.
Tricil (Laidlaw) Landfill Felt Mills, NY	NL	—
Commercial properties[1] Brownville, New York		ICF KE's CERCLIS review for other potential Superfund sites did not identify any properties located in Brownville.

[1]ICF KE performed a CERCLIS review of industrial and commercial business in close proximity to the James River-Brownville facility.

Key:
- NL = facility on federal CERCLIS.
- DS = discovery. Site reported as a potential environmental problem; no sampling or analysis conducted.
- PA = preliminary assessment. Records review and visual inspections; some sampling may be conducted.
- SI = site investigation. On-site sampling and analysis conducted.
- Closed = EPA plans no further investigation or remedial action.
- Active = still under investigation as a potential Superfund site.

JR-Brownville provides dust masks to employees as respiratory protection to dust generated when pouring bags of clay into the mixing tank. However, during ICF KE's site inspection, an employee pouring the clay was not wearing a dust mask. An air quality study, performed by Aires Environmental Services, Ltd. (1989), indicated 0.17 milligrams of dust per cubic meter within the mill. This is below the OSHA PEL of 5 milligrams of dust per cubic meter.

According to Mr. Arvan, JR-Brownville has also implemented (since Sept. 1990) several engineering modifications to improve ventilation in both paper machines as well as the coater. In addition, the mill has reportedly implemented additional training in the use of respiratory protection. However, JR-Brownville has apparently not improved the enforcement of use of respiratory protection by employees when needed.

The results of other air quality studies also performed by Aires Environmental Services, Ltd. (1989), except the formaldehyde testing, are presented in the table below and indicate that the facility is in compliance with the OSHA regulations. The initial air quality study for formaldehyde was performed in March 1988 by CS Environmental Laboratory, Inc., and revealed results around the machinery that ranged from 0.14 mg/m^3 to 1.78 mg/m^3 (OSHA PEL = 1.0 ppm). However, the facility made some adjustments, which included the use of a formaldehyde "scavenger" in the saturant, and subsequent testing for formaldehyde indicated decreased levels (0.05 ppm to 0.41 ppm, OSHA's action level = 0.5 ppm).

Compound	Facility Results	OSHA PEL
acrylonitrile	below detection limit (0.07 ppm)	2 ppm
ammonia	levels less than 13 ppm	50 ppm 35 ppm (STEL)
carbon monoxide	7 ppm to 15 ppm	35 ppm
epichlorohydrin	below detection limit (0.01 ppm)	5 ppm
formaldehyde	0.05 ppm to 0.41 ppm	1 ppm

The facility did not have a written confined-space entry program at the time of the ICF KE visit. However, the fuel oil storage tank is contained within a vault that can be considered a confined space. Steven Snook indicated that personnel do occasionally perform work within the vault.

Since the ICF KE visit in September 1990, JR-Brownville has prepared a written Standard Operating Procedure (SOP) for confined space entry into the vault that houses the oil storage tank. The SOP requires that a written entry permit be completed by the responsible supervisor prior to entry, that the space be tested prior to entry for oxygen and lower explosive limit (LEL), and that all toxic gases be controlled within their prescribed TLV. This procedures complies with the new OSHA regulation scheduled to go into effect by mid-1991. Under the proposed OSHA regulation, a confined space is defined as follows:

- An area large enough and so configured that an employee can bodily enter and perform assigned work;
- An area with limited or restricted means for entry or exit; and

- An area that is not designed for continuous human activity.

The proposed OSHA standard further defines a confined space as having one or more of the following characteristics:

- The area contains or has a known potential to contain a hazardous atmosphere;
- The area contains a material with the potential to engulf an entrant;
- The area has an internal configuration such that an entrant could be trapped by inwardly converging walls or a floor that slopes downward and tapers to a smaller cross section; and
- The area contains any other recognized serious hazard.

The vault containing the storage tank would therefore be considered a confined space, sinc it has limited or restricted means for entry or exit and may contain a hazardous atmosphere (benzer fumes). JR-Brownville has adequately addressed confined space entry by implementing the new developed SOP.

4.6 W. SPRINGFIELD, MA

4.6.1 Overview of Operation

Operations at the James River-West Springfield (JR-West Springfield) facility include production of specialty latex-saturated and vinyl-coated paper from cellulose fibers, softwo hardwoods, and synthetics. The facility operates one paper machine and an associated two-s saturator. Other production operations include pulping, blending, refining, screening, drying, rewinding. The paper is then transferred to either a printer or one of two coaters, where the product is completed. The emissions from the printer and coaters are routed into two air poll control devices, a boiler incineration system, and an electrostatic precipitator (ESP). The process wastewater is pretreated to control pH and discharged into the City of Springfield sewer system. Hazardous waste such as waste solvents and waste oil are distilled on-site or sent to approved off-site treatment, storage, and disposal facilities.

In 1839, Agawam Chemical Company built the first structures (a chemical manufacturing facility and a dam) on the site. In 1875, American Writing Papers purchased the property and began constructing paper mill buildings. Since 1875, the property has been a paper mill with several owners, including American Writing Papers, Strathmore Paper, Premoid Corporation, and James River Corporation. The JR-West Springfield facility occupies an 18.52-acre parcel of land purchased from Premoid Corporation in 1986. The site is occupied by both an operating and abandoned paper mill. There are 180,000 square feet of floor space in the operating mill, which consists of the Premoid Mill, stockhouse, and hydroelectric facility. The abandoned mill, known as the Strathmore Building, ceased operations in 1964. There are approximately 140 employees working at the mill.

APPENDIX 49

1993 Recon Systems, Inc. Site Summary Report

Recon Systems Inc.
5 Johnson Drive, PO Box 130
Raritan, NJ 08869-0130
908 526-1000/FAX 908 526-7886

SITE SUMMARY REPORT
RECON Project No. 4184
April 19, 1993

DECORATIVE SPECIALTIES INTERNATIONAL, INC. (DSI)
Bridge Street
Brownville, NY 13615

February 22 - 23, 1993 Site Visit
(3 - 4 feet of snow cover, 20°F)

PERSONNEL INVOLVED:

Joseph Hurd, Mgr. of Process, DSI
Sandra Mercuri, Technical Spt., DSI
David Pavlas, Plant Engr., DSI
Stephen E. Laney, RECON SYSTEMS
William M. Hanna III, RECON SYSTEMS

Recon Systems Inc.
Raritan, NJ 08869-0130

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Recon Systems Inc.
Raritan, NJ 08869-0130

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The information presented in this report was gathered from an onsite meeting, inspection and file review, aerial photographs (10/24/56, 12/4/71, 11/16/88), ICF KAISER ENGINEERING (ICF KE) report, topographic maps, Factory Mutual maps (5/26/31, 1/6/92), an Environmental Risk Information Imaging Services (ERIIS) report (2/8/93), additional documents supplied by plant personnel, and from a file review with the New York Department of Environmental Conservation (NYDEC), Watertown, NY. Property deeds were not reviewed for historical information or for deed restrictions. Property boundaries appeared to coincide with those shown on available site maps.

1.0 SITE HISTORY

1.1 Historical Ownership and Usage

The original building was built in 1814 as a cotton/textile mill. During the time it was used as a cotton mill, the property changed hands as many as 20 times. A fire destroyed the mill in 1888. The Cornell Box Company, owned by Samuel Upham, bought the property and built a paper mill. The mill produced paper and boxes. After another fire, in 1890, the mill was purchased by the Brownville Paper Company.

The Brownville Paper Company operated a paper mill at the site from 1890 until 1986. During this time, logs were reduced to groundwood pulp for paper making. No evidence of bleaching was indicated on a 1931 Factory Mutual Map and none was reported by site personnel. Kraft pulping was performed onsite. Two paper machines were in production during the Brownville Paper Company operations producing bond paper for government use. No coating processes were involved. Specialty paper production began during 1973 with the addition of paper coating equipment and the shutting down of one paper machine.

According to the deed reference on the ALTA/ACSM Land Title Survey dated 4/10/91, the Premoid Corporation was successor by merger of Brownville Paper Company to Riegel Products Corporation, L.1011 P.183, 1/23/86. Riegel Products Corporation and James River U.S. Holdings, Inc. were merged into James River Paper Company, Inc. by Certificate of Merger L.1176 P.92, 6/20/89. James River sold the business to Decorative Specialties International, Inc. (DSI) in May 1991.

DSI manufactures various grades of paper, including latex-saturated book cover, clean-room paper (dust and particle

free), and decorative product grades (flocking base and unflocked).

1.2 Facility/Property Description

Decorative Specialties International (DSI) is located on the north side of the Black River straddling Bridge Street in the Village of Brownville. The site consists of two buildings on approximately 4.5 acres of land. The main plant and paper production operation is located on the west side of Bridge Street on approximately 3.5 acres. A warehouse is located on the east side of Bridge Street and is used for finished product storage and shipping and for raw materials storage and receiving.

The main plant consists of four floors (numbers increase downward) with the 4th floor located within the flood range of the Black River. The floors decrease in total area from 1st to 4th level. The warehouse consists of two floors, with a 50,000-gallon water tower. This tower is also used by the Brownville Fire Department. Water is supplied to the tower by the Village of Brownville.

The main plant consists of approximately 98,000 square feet and the warehouse is approximately 2,000 square feet. Fifty percent of the site is used for manufacturing, 40 percent for storage, and 10 percent for office use.

The plant is built upon micritic limestones of Middle Ordovician age belonging to one of either the Chaumant, Lowville, or Sugar River formations. The property on the north side of the main plant is a large bowl-shaped area which may be a collapse doline or sink hole. A "disappearing" stream (Philomel Creek) is located east of the warehouse. This stream

resurges as a spring below the main plant approximately 15 feet above the river.

The Village of Brownville Publicly Owned Treatment Works (POTW) is located immediately west of the main plant. The area north and east of the site is residential. Boise Cascade operates a paper mill on the south side of the Black River directly across from DSI.

Those responsible for environmental affairs at this facility appear to be committed to facility regulatory compliance. However, more emphasis should be made on understanding the regulations and their requirements, in addition to making improvements to their recordkeeping/filing system.

1.3 Satellite Properties

DSI owns one property not contiguous with the main site in Brownville and leases another property in Watertown, NY.

DSI owns approximately 0.6 acres of undeveloped property at the south end of Maple Street in Brownville (Lot No. 43, Parcel No. 73.71-1-43). A small warehouse (brick and wood) was originally located on the property but burned down in 1983. The property was originally used for the loading/unloading of product and materials from the Penn Central Railroad, which crossed the south side of the property. The tracks have since been dismantled. The Maple Street property is surrounded by residential lots, has no zoning restrictions, and was appraised at $3,500. The property does not have water or sewer facilities.

DSI leases two warehouse rooms (Bays 7 and 8) from Cleaves Lumber Company on Edmund Street in Watertown, NY. The leased property is used for finished paper and dry materials storage.

The bays have been leased since 1973 and were previously used for shipping and receiving by rail. There is no heat, water, or septic in the building.

1.4 Process Description

DSI's primary product is latex-saturated paper. Approximately 40 tons of paper are produced per day on one paper machine using the Fourdrinier process. Sixty-six people work five days a week, around the clock.

Prebleached raw Kraft pulp is received in bales and rolls and hydrated in two pulpers. Dry pulp is received from five sources, including eucalyptus fibre from Brazil. Wet pulp is then sent to the dump chest for coarse filtering and to the machine chest where additives such as calcium carbonate, nylon fibers, clays, and dyes are blended. Stock from the machine chest goes through a series of cleaners, screens, and refiners before entering the wet end of the paper machine.

The paper machine is electrically driven. No large hydraulic systems are involved. The paper dryers are all steam heated. No hot oil systems were ever used. Steam is generated in two boilers; one uses No. 6 fuel oil (1.5% sulfur), and the other natural gas. Coal was previously used for steam generation. Approximately 3300 gallons per day (gpd) is burned when oil is used (natural gas is used as much as possible).

After the pulp is dehydrated in the dryers and becomes paper, it goes through the saturator where the latex is applied, then through more dryers and finally the reel. There are three radioactive devices on the paper machine; one is located before the first dryers, another before the saturator, and the final device before the reel. These sources are part of a system

which checks the bulk weight and moisture content of the paper, which is related to the paper thickness.

From the paper machine, the paper is run through a winder and then to the off-machine coater. The final latex coating is applied to the paper by two coaters, is dried, sent to the inspection winder for trimming, then rolled and packaged as final product.

2.0 AIR ISSUES

2.1 Air Permits

DSI has New York Department of Environmental Conservation (NYDEC) permits for three air pollution sources. These permits cover the 30.9-million Btu/hour fuel oil boiler, the kady mill and the 18,500-gallon fuel oil tank.

Permits for the fuel oil boiler and the kady mill were granted on August 5, 1991. The permit for the fuel oil tank was transferred from James River Corporation/Premoid Division to DSI on May 30, 1991.

DSI appears to be in compliance with these permits and no enforcement actions have been taken by NYDEC. Several years ago, DSI was burning fuel oil with a sulfur content over the regulated 1.5% limit. NYDEC knew about this but did not issue a violation. DSI was allowed to correct this problem, which they did by requiring their fuel oil supplier to provide sulfur analysis every time the supplier received a new shipment. DSI claimed that this solved the problem.

DSI also has a 26.2-million Btu/hour boiler that is natural gas fired. NYDEC does not currently require permitting of natural gas boilers with capacities less than 250 million Btu/hour. However, NYDEC stated that this may change in the near future. No other air pollution sources were identified as needing air permits.

2.2 Future Regulatory Requirements

The Clean Air Act Amendments (CAAA) of 1990 may require that DSI comply with the Reasonably Available Control Technology for

nitrogen oxides (NOx RACT) and possibly obtain a federal operating permit.

Compliance with these regulations will most likely involve installing "low NOx burners" and the time and expense necessary to obtain a federal operating permit. The implementation of these requirements, which are not yet finalized in the state of New York, will be spread out over the rest of this decade and into the next.

2.3 Potential Financial Liabilities

The financial liabilities associated with air pollution issues will result from compliance with the CAAA.

3.0 ASBESTOS

There is no formal Asbestos Containing Materials (ACM) program at DSI. An ACM survey has never been conducted onsite. DSI's policy is to remove any ACM when it is found.

The only place in the facility where suspected ACM was located is on and around the three old coal-fired boilers in the mezzanine area between the second and third levels. Suspect asbestos was located on the nose pieces of the boilers and on piping surrounding the boilers. The ends of pipe runs and areas on the nose pieces were recently patched due to friable asbestos being exposed. Suspected friable ACM was still located on pipes not easily accessible from the boiler platforms. Suspect ACM had also deteriorated and fallen to the floor around the base of the double boilers. This area was semi-contained by a brick wall in a low-traffic area. It was estimated that 75-100 linear feet of suspect ACM may still be present in this area.

3.1 Potential Financial Liabilities

Potential financial liabilities relating to asbestos involve the removal of ACMs from the old boiler area and a mini-survey to insure all ACM has been identified.

4.0 WATER AND WASTEWATER ISSUES

4.1 Water Supply

4.1.1 Potable Water

The Village of Brownville supplies DSI with potable water. The Village supply is well water. DSI receives approximately 12,000 gpd from the Village.

DSI has a 50,000-gallon water tower which receives the Village water. DSI also maintains an agreement with the Village to allow use of this water tower for Village fire protection. No written agreement exists; it is simply a "good faith" agreement.

This water is for potable use as well as some process use.

4.1.2 General Process Water

DSI withdraws approximately 300,000 gpd from the Black River. This water is used for non-contact cooling as well as some general process use. DSI stated that they do not treat the river water.

The river water is held in a 450,000-gallon tank through which the non-contact cooling water is recirculated. The process use water is also removed from this tank but it is not recirculated back to the tank.

The tank over-flow is returned to the Black River. This discharge to the Black River requires that DSI obtain a State Pollution Discharge Elimination System (SPDES) permit for discharging to surface water. A permit application was filed in October of 1987 but NYDEC has apparently not begun its

review. Although this discharge continues without formal permission from NYDEC, it does not appear that this will become a significant issue. At the time of the site visit, DSI was considering employing a consultant to help expedite the SPDES permitting process, which may result in re-submitting the application.

4.2 Wastewater

DSI generates an average of 40,000 gallons of wastewater per day. This water flows through a network of drains, pulp recovery steps, holding tanks, and pretreatment. The wastewater is ultimately discharged to the Village of Brownville water treatment facility.

The pretreatment system, prior to discharge to the POTW, consists of a diatomaceous earth (DE) filter, an equalization tank, and pH adjustment (when necessary). Wastewater flows are segregated by anticipated solids level in order to limit the flow of wastewater to the filter system. This ensures that the wastewater that needs solids removal gets filtered, and that manhours and filter material is not wasted on wastewater not requiring solids removal.

DSI maintains several pH monitors and alarms on the wastewater flows to ensure that the discharge to the Village of Brownville treatment facility is within the 5.0 to 10.0 range set forth in the treatment permit. The pH monitors are set at 5.5 and 9.5 to automatically direct the discharge to holding tanks where the pH can be adjusted manually. pH exceedances occur approximately once per month, according to DSI personnel, but do not require total facility shutdown.

DSI's relations with the Village of Brownville have been somewhat strained in past years. This was due, apparently, to

a disagreement over who was responsible for the POTW backing up and failure to meet NYDEC discharge limitations. This ultimately resulted in DSI installing pretreatment equipment (DE filter, etc.).

DSI personnel stated that relations with the Village treatment facility have improved and they finalized a new permit in December of 1992. DSI claimed that there have been no complaints from the Village since DSI installed the treatment equipment and they do not anticipate any problems renegotiating a renewal of the permit, which expires in December of 1993. However, if relations were to again become strained, DSI claimed that the Village could possibly stop accepting DSI's wastewater.

The current permit requires continuous, daily, bi-weekly, and semi-annual monitoring of a number of different parameters. All monitoring data must be reported monthly. DSI claimed to be complying with the conditions of the permit.

The permit states that permit transfer "shall not be unreasonably withheld" providing the new owner certifies in writing that he will comply with the existing permit. It appears that there will be no need to re-negotiate the permit upon transfer of ownership.

4.3 Stormwater

DSI submitted the Notice of Intent to file for a General Permit under the New York SPDES Program on September 29, 1992. DSI did not have any further correspondence from NYDEC regarding stormwater permitting. Apparently, they have not yet received their general permit number and compliance requirements.

DSI personnel were not familiar with the stormwater program requirements and were not aware of the status of their permit.

4.4 Potential Financial Liabilities

Potential financial liabilities relating to water issues involve stormwater permitting and Stormwater Pollution Prevention Plan (SPPP) design and implementation as well as SPDES permitting and sampling and analysis.

Further breakdown of the estimated liabilities can be found in the attached tables and calculations. The "worst case" estimate would involve DSI constructing their own wastewater treatment system.

5.0 HAZARDOUS WASTE MANAGEMENT

5.1 Hazardous Waste Storage and Reporting

DSI is a small-quantity generator of hazardous waste with USEPA I.D. number NYD982188427. As such, DSI may be required to submit annual hazardous waste generator's reports. In addition, DSI must submit hazardous waste manifests with each shipment. No records of these submittals were available during the site visit and it was not clear whether any were ever prepared.

DSI is also required to establish a hazardous waste storage area with adequate spill containment. DSI did not have a designated hazardous waste storage area. Hazardous waste was identified and scattered throughout the facility. Areas identified include the third level of the main building where waste biocide, waste "electric motor solvent", and waste caustic were stored, and the south end of the warehouse, where eight drums of waste kerosene were stored.

Hazardous waste labeling did not comply with the federal/state hazardous waste labeling requirements. These regulations also require that a generator obtain a Treatment Storage and Disposal (TSD) permit if they store waste for more than 90 days at a time. It appeared that DSI's waste had been stored for longer than that time period.

Areas where hazardous waste was stored were not designed for spill prevention and/or containment. The waste kerosene was stored approximately 20 feet from the Black River with no containment. This storage scenario could result in a serious spill causing DSI high financial liabilities.

5.2 Potential Financial Liabilities

The hazardous waste management improvements discussed above involve minor financial liabilities, barring any accidents. If an accident occurred, it could cause very high financial liability given the lack of hazardous waste spill prevention planning at DSI. Improving the storage conditions represents the best and most likely potential financial liability ($10,000 to $20,000), whereas the worst case represents an estimate of an uncontrolled release of uncontained hazardous materials to the environment ($1,000,000).

6.0 SOLID WASTE MANAGEMENT

6.1 Solid Waste Disposal Methods

DSI uses the Development Authority of the North Country (DANC) landfill in Jefferson County, New York for all solid waste disposal. Some recycling is done, where possible, but the latex-saturated paper can not be recycled once the latex is set.

Approximately one ton per day of filter sludge is sent to DANC. This sludge is generated by the diatomaceous earth (DE) filter used to pretreat the wastewater going to the Village of Brownville treatment works. The sludge consists of waste solids and DE. A toxicity characteristic leachate procedure (TCLP) analysis showed the sludge to be non-hazardous.

Approximately 20 tons per week of general (non-hazardous) solid waste is sent to DANC for disposal. This waste is placed in 20-cubic-yard dumpsters which are transported by Laidlaw Transporters, Inc.

6.2 Potential Financial Liabilities

Potential financial liabilities related to solid waste management, other than those listed above, are considered minor.

7.0 UNDERGROUND STORAGE TANKS

DSI has no underground storage tanks and, reportedly, none ever existed onsite.

7.1 Potential Financial Liabilities

No potential financial liabilities were identified.

8.0 MATERIAL AND PRODUCT STORAGE

8.1 Hazardous Raw Materials Storage

DSI uses hazardous materials throughout the facility. Hazardous materials are stored in drums, totes, and small containers. These are not uniformly labeled by hazard class (flammability, corrosivity, reactivity, toxicity).

Hazardous material storage was scattered and should be more centralized where feasible. Adequate containment was not provided in areas storing hazardous materials. DSI personnel stated that the floor drains leading to the effluent treatment system provided spill control. This is not adequate due to the potential risk of discharging hazardous materials to the Village of Brownville treatment works and, ultimately, to the Black River.

8.2 SARA/Community Right-to-Know

DSI is subject to the requirements of section 312 of Title III of the Superfund Amendment and Reauthorization Act (SARA) for the use of hazardous materials. DSI supplied a copy of the Section 312 Tier II form that was submitted in 1992; it appeared to be in order. DSI personnel claim they are below the threshold requiring submittal of the Section 313 forms.

8.3 Spill Prevention Control and Countermeasure

DSI is required to develop and implement a Spill Prevention Control and Countermeasures Plan (SPCC Plan) because they store more than 1,320 gallons of a petroleum product above ground. Specifically, DSI has a 18,500-gallon No. 6 fuel oil tank in an aboveground vault. Containment within the vault was

questionable due to cracks between the floor and sides of the diked area.

DSI has a "Facility Response Procedure" that addresses many of the requirements of the SPCC plan but it is not certified by a professional engineer as required. It was also not clear to whom the facility response procedure was submitted. DSI should re-evaluate their facility response procedure, revise it to meet the SPCC Plan requirements, and have it certified by a professional engineer.

8.4 Non-Hazardous Raw Material and Product Storage

The DSI facility has much space available for storage. Non-hazardous raw materials are stored in drums, totes, bins, bags and tanks which were fairly well organized and maintained. The only concern with non-hazardous raw material storage is that it was not segregated from hazardous raw material storage.

Products were stored on clean floors and spaced to allow aisles for forktruck maneuvering and personnel. No areas of concern exist for this issue.

8.5 Potential Financial Liabilities

The potential financial liabilities related to material and product storage result from the need to improve and re-organize hazardous materials storage and the need to upgrade and certify an SPCC plan.

Further breakdown of the estimated liabilities can be found in the attached calculations.

9.0 PCB INVENTORY

DSI has sixty-five dry-type transformers inhouse. One unmarked transformer was located on the mezzanine outside of the old switch room. A PCB wipe-sample was taken from the front panel of the transformer. This sample contained 0.48 ug/100 cm^2 of PCB-1254. The oil in this transformer may contain PCBs. DSI plans to dispose of this transformer in the near future.

A second PCB wipe-sample was taken from the floor of the old motor storage area on the second floor. Old transformers (non-PCB) and electrical equipment were stored in this area. This sample detected no PCBs.

According to site records, no PCBs have been disposed of since before 1987.

9.1 Potential Financial Liabilities

The potential financial liabilities related to PCB transformer identification and disposal involve sampling and disposal costs.

Further breakdown of the estimated liabilities can be found in the attached calculations.

10.0 PAST DISPOSAL PRACTICES

10.1 Onsite

It was reported that "uncontrolled dumping" of non-hazardous materials was allowed in the area northwest of the main plant. The Jefferson County Highway Department reportedly dumped building debris and used tires as recently as 1989. Most of the fill material consists of concrete debris and construction/ demolition material. After the material was dumped it was reportedly covered with sand. Dumping is no longer permitted. Hazardous materials may have been dumped there at some time in the past, possibly impacting soils and groundwater.

10.2 Offsite

See Section 6.1.

10.3 PRP Notification

According to facility personnel, no Potentially Responsible Party (PRP) notifications had been received by DSI as of February, 1993. The Transformer Service Inc. facility in Concord, NH, may still be undergoing a site investigation by the State which began in 1988. Since DSI has not disposed of PCBs since before 1987, liability related to PCB disposal should not be assigned to the new owner.

10.4 Potential Financial Liabilities

Liabilities associated with onsite disposal relate to the "uncontrolled dumping". Further breakdown of the estimated liabilities can be found on the attached calculations.

11.0 OCCUPATIONAL SAFETY AND HEALTH ISSUES

11.1 Lost-Time Accidents

DSI lost 9 mandays, 51 mandays, and 30 mandays in 1992, 1991, and 1990, respectively, due to lost-time accidents. All accidents for these three years were minor cuts, burns and strained-back injuries.

According to DSI personnel, there are no outstanding lawsuits related to accidents on the job.

11.2 Safety Training

Employees are given process-specific training upon hiring. This includes welding training and lift-truck training as well as hazard communications training, if applicable. DSI personnel stated that annual refreshers are provided in these areas.

Not having observed training sessions, it is difficult for RECON to evaluate the effectiveness of the training. However, the written hazardous materials communication program was provided by DSI and appeared adequate.

Confined-space training and an entry permit program have been implemented at DSI. However, confined spaces are not marked.

11.3 Housekeeping

Housekeeping at the DSI facility is moderate (acceptable), except as noted. There are many leaks and overflows of product and raw materials that are allowed to flow across floors and into drains. These conditions pose a physical hazard.

A mock "wall to wall" inspection was performed with the help of a consultant which resulted in a "to-do" list. The items on the list are nearly 90% complete according to DSI personnel.

11.4 Potential Financial Liabilities

No major accidents have occurred in the past two years and DSI is not losing large revenues on lost-time accidents. Therefore, the potential financial liabilities associated with occupational safety and health are minor.

12.0 RADIOACTIVE SOURCES

As noted in Section 1.4, DSI utilizes three radioactive sources as measuring devices. These sources all emit low-level radiation but do require registration with the New York Department of Labor, Division of Safety and Health.

DSI has obtained the general registration for the radioactive sources and were aware of the requirements set forth therein.

12.1 Potential Financial Liabilities

There are no significant potential financial liabilities associated with the radioactive sources, provided the requirements of the general registration are adhered to.

13.0 OTHER ENVIRONMENTAL ISSUES

13.1 Spills/Releases

Five spills were reported at the site since 1990. The largest of these, in 1992, involved 100 gallons of latex emulsion which was spilled when the hose from the truck to the fill pipe ruptured. This spill was contained.

The steam condensate which was reported in the ICF KE report as discharging to Philomel Creek east of the warehouse building has now been redirected to the POTW.

The overflowing manhole problem reported in the ICF report was remedied by installing a level control in the effluent holding tank in the mill and an alarm on the POTW holding tank. This system controls the amount of effluent being discharged to the POTW at any one time. The previous overflow problem was due to backups from the POTW's holding tank or due to latex clogging of the POTW's filters. The mill now uses the DE filter to remove solids prior to discharging to the POTW.

13.2 Areas of Environmental Concern

The bowl-shaped area northwest of the plant may be part of a stabilized sink hole. If it is in fact a sink hole, there could be further subsidence if the proper conditions are met. There is no evidence of movement since the early 1800s so this concern may no longer be appropriate although it should be noted.

13.3 Wetlands

Federal wetlands may be present along the base of the fill area on the west end of the property. An area no larger than 0.25

acres would be involved. A small wetlands area may also be present along the Philomel Creek bed east of the warehouse.

13.4 Septic Systems

There is no septic disposal system onsite. All sanitary and process wastewater is sent to the nearby POTW for treatment.

13.5 Wells

No production, potable, or monitoring wells are located onsite.

13.6 Potential Financial Liabilities

Potential financial liabilities will only result from a worst case scenario. This worst case would involve delineation and possible excavation of soils in the steam condensate discharge and manhole overflow areas.

14.0 GROUNDWATER

There was only one significant groundwater issue uncovered at the DSI site. A break in the No. 6 fuel oil fill line, plus leakage from a fuel oil heater pump located in a mezzanine between the second and third floor, has resulted in oil accumulating in the soil and bedrock below the points of release. Oil has infiltrated into a storm sewer near the northeast corner of the main plant and has migrated west along the north side of the building. Oil as free product (beads and film) has impacted the shallow water table (5-8 feet below grade) along the north side of the mill.

Oil was first noticed discharging to the Black River from the storm drain on October 11, 1991. The discharge was reported to the NYDEC (Spill No. 9107640). Sorbent booms were placed in the river and the storm sewer was steam cleaned. Because of the construction of the storm sewer (open to bedrock on the east end), oil continued to leak into the downstream piped section.

DSI retained INTEX to perform soil excavations inside the oil storage room, below the original line break, and in and around the archway (part of the original coal storage area) to remove and dispose of oil-contaminated soils. No monitoring wells were installed or are proposed.

River water and sediments downstream of the storm-sewer outfall were sampled for petroleum hydrocarbons. None were detected. A document summarizing test-pit sampling and post-excavation results and also proposing additional hydrogeologic investigations was in draft form in February but unavailable for RECON's review.

INTEX has proposed an interception trench with a sump collection system to recover oily groundwater from above bedrock. The recovered water will be treated using an oil/water separator and activated carbon canisters, then discharged to the Black River under a SPDES permit. INTEX's estimated cost for implementing this recovery/treatment system (with permitting) is $60,000. Any oil which may have impacted groundwater in the bedrock may not be remediated using this recovery design.

INTEX does not appear to be taking the proper steps to fully investigate the problem prior to installation of the recovery trench. Monitoring wells were not proposed in the scope of work to delineate groundwater quality in the water-table aquifer or in the upper bedrock. Since the Village of Brownville receives its potable water from wells which may be within one mile of the site (considering the size of the Village), oil contamination in the limestone aquifer in karst terrain may reach the supply wells if enough oil is lost, and if the supply wells are shallow and solution openings in the rocks trend toward the supply well(s).

14.1 Potential Financial Liabilities

Potential financial liabilities associated with groundwater issues concern the oil plume remediation and landfill cleanup. Breakdown of these liabilities can be found in the attached calculations.

15.0 DOCUMENTS REVIEWED

ICF KE Engineers report titled "Environmental Assessment of James River - Specialty Paper Division, Domestic Facilities" identified as a revised draft report dated February 12, 1991.

New York Department of Environmental Conservation (NYDEC) Air Permits.

NYDEC Air Quality Files.

NYDEC Industrial Inspection Report, 1992.

SPDES Application with related correspondence, filed October 6, 1987.

DSI, 1987, Transformer Inventory, Updated February 23, 1993.

Various MSDS.

DSI Raw Material Inventory.

DSI Effluent Analysis Report, December 30, 1992.

INTEX Task Completion Schedule, February 19, 1993 and various documents relating to SPILL #9107640.

Diatomaceous Earth Filter Sludge Analysis, Including TCLP Extraction, December 26, 1992 and December 17, 1992.

Warehouse Lease.

DSI Product Inventory.

Hazard Communication Written Program (DSI Employee Handbook).

SARA Title III Section 312, Tier II for 1991.

Slug Discharge Prevention and Control Plan, December 23, 1992.

Facility Response Procedure, June 1992.

NYDEC Division of Air Resources 1990 Fuel Use Inventory.

USEPA Acknowledgement of Hazardous Waste Activity, June 10, 1991.

DSI/Village of Brownville Water Treatment Permit and various letters relating to pretreatment requirements and effluent flow diagram.

Stormwater Notice of Intent for General Permit, September 29, 1992.

OSHA Section 200 Reportable Injuries Logs (1990 - 1992).

ERIIS Report.

US Geological Survey Topographic Maps.

Various site maps, including 1931 and 1992 Factory Mutual Maps.

Aerial photos from 1956, 1971, and 1988.

Map and description of Maple Street property.

ALTA/ACSM Land Title Survey, April 10, 1991.

Recon Systems Inc.
Raritan, NJ 08869-0130

ATTACHMENT I

Site Specific Estimating Worksheets

SITE SPECIFIC ESTIMATING WORKSHEETS

Brownville, New York

1.0 SITE HISTORY

- Significant liabilities related to site history will be addressed in the following sections.

2.0 AIR ISSUES

- Best case assumes that the facility is not a major source, therefore nothing new will be required.

- Assume major source (Most Likely and Worst Case) - CAAA will require the following:

  Low NOx burners for two (2) boilers: $300,000. (D, 1 - 3)

  Federal Operating Permit: $30,000 (D, 3 - 4)

  Federal Operating Annual Permit Fee ($25./Ton): $15,000. (D, 4 - 10)

  Stack Testing: $20,000. (worst case only)

3.0 ASBESTOS

- Asbestos survey $5,000.

- Deteriorating ACMs on and around old boilers (nose pieces). 10 cubic yards x $70./cubic yard = $700. (most likely and worst cases). (C, 1 - 2)

Brownville, New York

- PI, assume 100 linear feet x $20./linear foot - $2,000. (most likely and worst case). (C, 1 - 2)
- Best case assumes no action deemed necessary.
- Total most likely case asbestos control estimate: $3,000. (C, 1 - 2)
- Total worst case asbestos control estimate: $8,000.

4.0 WATER SUPPLY AND WASTEWATER ISSUES

- Stormwater

  Best and Most Likely Cases

  General permit: $10,000 (D, 1 - 2)

  Annual administrative costs: $5,000. (D, 2 - 10)

  Worst Case

  Individual permit: $30,000.

  Annual sampling and analysis/administrative costs: $30,000. (D)

Brownville, New York

- Wastewater

  Best and Most Likely Cases

  SPDES permit negotiation: $10,000. (A, 1 - 2)

  Administrative (sampling, etc.): $10,000./year (A, 2 - 10)

  Worst Case (assume loss of Brownville POTW permit)

  Type II treatment system: $500,000.

  O & M: $300,000.

  Administrative: $75,000.

5.0 HAZARDOUS WASTE MANAGEMENT

- Best case assumes that training program is acceptable, but storage and shipping upgrades are required.

- Most Likely Case

  Upgrade training programs: $5,000. (C, 1 - 2)

  Annual administrative costs: $5,000. (C, 2 - 10)

  Upgrade storage and shipment practices: $10,000. (C, 0 - 1)

- Worst case assumes spill under current storage conditions (order of magnitude estimate): $1,000,000.

Brownville, New York

6.0 SOLID WASTE MANAGEMENT

- No significant liabilities were identified.

7.0 UNDERGROUND STORAGE TANKS

- No USTs ever present onsite.

8.0 MATERIALS AND PRODUCT STORAGE

- Best case assumes current plan is deemed acceptable and no further changes are deemed necessary.

- Most Likely and Worst Cases

  SPCC Plan: $10,000. (C, 1 - 2)

  SPCC implementation (improve containment): $10,000. (C, 1 - 2)

9.0 PCB INVENTORY (B)

- Best and most likely cases assume testing and removal of one small transformer: $10,000. (C, 0 - 1)

- Worst case assumes finding additional small transformer present in basement. Worst case total is $20,000.

Brownville, New York

10.0 PAST DISPOSAL PRACTICE (ONSITE)

- Best and Most Likely Cases

  Assume initial sampling shows no need to remediated.

  Total initial sampling and analysis: $20,000. (B, 2 - 3)

- Worst Case

  Assume delineation and remediation necessary.

  Order of magnitude estimate: $1,000,000.

11.0 OSHA

- No significant liabilities were identified.

12.0 RADIOACTIVE SOURCES

- No significant liabilities were identified.

13.0 OTHER ENVIRONMENTAL ISSUES

- Steam condensate discharge to onsite creek bed and manhole overflow.

  Best and Most Likely Cases - Assume no sampling or remediation deemed necessary.

Brownville, New York

Worst Case - Assume initial sampling necessary: $20,000.

Soil removal: 20 cubic yards x $125./cubic yards = $2,500.

Total worst case: $23,000.

14.0 GROUNDWATER

- Best and Most Likely Cases

Initial Sampling: $27,270. (C, 0 - 2)

Delineation Sampling: $17,100. (C, 0 - 2)

Remediation (based on INTEX proposal for recovery trench): $75,000. (C, 0 - 2)

Total best and most likely cases (50% capital, 25% O&M, 25% administrative): $120,000. (C, 0 - 2 Capital, 2 - 10 O&M)

- Worst Case

Initial sampling: $27,270.

Delineation sampling: $36,000.

Remediation (assume recovery wells needed): $125,000.

Total worst case (50% capital, 25% O&M, 25% administrative).

APPENDIX 50

1998 Motor Oil Release

New York State Department of Environmental Conservation
Division of Environmental Remediaion, Region 6
Dulles State Office Building, 317 Washington Street, Watertown, New York 13601-3787
Phone: (315) 785-2513 FAX: (315) 785-2422

John P. Cahill
Commissioner

June 3, 1998

RETURN RECEIPT REQUESTED

Mr. Steve Lange
REXAM DSI
Bridge Street
Brownville, New York 13615

RE: SPILL #9802720

Dear Mr. Lange:

On June 1, 1998, this office was notified of an incident at DSI. An investigation of the site revealed that soil has been contaminated by petroleum.

This Department considers DSI responsible for this spill, therefore, we urge you to immediately initiate the following measures:

1. All contaminated material must be removed down to clean surfaces and stored on plastic and covered with plastic or contained in 55 gallon drums with secure tops until disposal.

2. Within 60 days the recovered material must be properly disposed of at a permitted facility, or treated on site in accordance with all local, State and Federal regulations.

3. Copies of all testing results and applicable disposal receipts must be forwarded to this office for our completion of record.

4. Please notify this office when you plan on performing the necessary work.

Sincerely,

Tom Voss

Kenneth Netto
Env. Engineering Technician I

KN:ebt

9/3/98 Close

Spill Number: 9802720 Spill Name: REXAMDSI **Printed on: 06/02/20**

DEC REMARKS

02/03/98: LETTER SENT TO STEVE LANGE AT DSI REQUIRING CLEANUP AND DISPOSAL
N).

REXAM

REXAM DSI
BRIDGE STREET
BROWNVILLE NY 13615
USA
FAX 1 315 782 5416
TELEPHONE
1 315 782 5800

26 Aug 98

Mr. Ken Netto
New York State of Environmental Conservation
Region 6
317 Washington Street
Watertown, NY 13601

Dear Mr. Netto,

In May of this year we discovered a stained area on the ground on the north east side of the mill. Analysis of soil samples taken from this area indicated that it was a petroleum hydrocarbon, specifically motor oil.
The area was excavated until the tested samples indicated that the concentration of motor oil was <80 mg/KG.

A total of eight 55 - gallon drums were filled with the contaminated soil. This material was disposed of by Republic Environmental of Bedford, Ohio.

Attached are copies of the soil analysis and the certificate of disposal.

If you have any questions, feel free to contact me at 782-5800 Ext. 12.

Sincerely,

Steven M. Lange
Senior Process Engineer

cc: Norm Tomlinson
Mark Lappies
Bob Murphy
Bill Hughes

CES Certified Environmental Services, Inc.

1401 Erie Blvd. East
Syracuse, NY 13210
Phone 315-478-2374
Fax 315-478-2107

REPORT OF ANALYSES

AAPEX Environmental Services
P. O. Box 6415
Syracuse, NY 13217-6415
Attn: Mr. William Hickok

PROJECT NAME: Rexam DSI-Brownville, NY
DATE: 06/11/98

SAMPLE NUMBER- 162551 SAMPLE ID- 1/Brownville, NY
DATE SAMPLED- 06/01/98
DATE RECEIVED- 06/01/98 SAMPLER- Mark Lappies
TIME RECEIVED- 1430 DELIVERED BY- William Hickok

SAMPLE MATRIX- SO
TIME SAMPLED- 1300
RECEIVED BY- CAM
TYPE SAMPLE- Grab

Page 1 of 1

ANALYSIS	METHOD	SAMPLE PREP DATE	BY	ANALYSIS DATE	TIME	BY	RESULT	UNITS
TOTAL PETROLEUM HYDROCARBONS	DOH 310-13	06/02/98	BJC	06/11/98		KSH		
GASOLINE	DOH 310-13	06/02/98	BJC	06/11/98		KSH	< 20	mg/Kg
KEROSENE	DOH 310-13	06/02/98	BJC	06/11/98		KSH	< 20	mg/Kg
FUEL OIL	DOH 310-13	06/02/98	BJC	06/11/98		KSH	< 20	mg/Kg
DIESEL	DOH 310-13	06/02/98	BJC	06/11/98		KSH	< 20	mg/Kg
MOTOR OIL	DOH 310-13	06/02/98	BJC	06/11/98		KSH	< 80	mg/Kg

NYSDOH LAB ID NO. 11246 APPROVED BY: Barbara J. Chen

REPUBLIC ENVIRONMENTAL SYSTEMS (CLEVELAND), INC.

10 INDUSTRI DRIVE / SEFFORD, OH 44146 / 440-786-7800
EPA I.D. #OHD055512439

CERTIFICATE OF WASTE DISPOSAL No. 13909

THIS IS TO CERTIFY THAT WASTE MATERIAL RECEIVED FROM:

Generator RBXIM/USI

E.P.A. ID CBSGQ

Address BRIDGE STREET / BROOKVILLE, NY

AS REFERENCED ON MANIFEST NUMBER: 052598

HAS BEEN ANALYZED AND ACCEPTED AS SPECIFIED UNDER THE FACILITY'S WASTE ANALYSIS PLAN. ALL MATERIALS REPRESENTED HEREIN SHALL BE STORED, TREATED, MANAGED AND/OR DISPOSED OF IN ACCORDANCE WITH ALL APPLICABLE LOCAL STATE AND FEDERAL REGULATIONS IN THE MANNER DESCRIBED BELOW.

Lab Code/Class #	D.O.T./E.P.A. Description	Storage/Treatment/Disposal Method
ND21610	NON REGULATION RCRA HAZ SOLID (N/A)	M121 M132

Bruce Williams 06/25/98

Republic Environmental Systems
Representative - Title:Operations Manager

TOTAL P.02

FILE COPY

3

THIS MEMORANDUM is an acknowledgment that a Bill of Lading has been issued and is not the Original Bill of Lading, nor a copy or duplicate, covering the property named herein, and is intended solely for filing or record.

~~RECEIVED~~, subject to the classifications and tariffs in effect on the date of the receipt by the carrier of the property described in the Original Bill of Lading,

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated below, which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is hereby agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in Uniform Freight Classification in effect on the date hereof, if this is a rail or a rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment.

Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CARRIER'S NO.

DECORATIVE SPECIALTIES
INTERNATIONAL INCORPORATED
Brownville, N.Y. 13615

NAME OF CARRIER

CONSIGNED TO

(Mail or street address of consignee—For purposes of notification only.)

DESTINATION Republic Environmental STATE COUNTY

DELIVERY ADDRESS 33 Industry Drive (To be filled in only when shipper desires and governing tariffs provide for delivery thereof.)

ROUTE Bedford, O. H 44146

DELIVERING CARRIER Franks Vacuum Truck Services CAR OR VEHICLE INITIALS 54/117-B NO. 80346 UNY

NO. OF PACKAGES	KIND OF PACKAGE, DESCRIPTION OF ARTICLES, SPECIAL MARKS, AND EXCEPTIONS	*WEIGHT (SUBJECT TO CORRECTION)	CLASS OR RATE	CK. COL.
	Rolls Pulpboard not corrugated nor indented (Fiber content not less than 80% wood pulp)			
	Skids Pulpboard not corrugated nor indented (Fiber content not less than 80% wood pulp)			
	Packages Pulpboard not corrugated nor indented (Fiber content not less than 80% wood pulp)			
	Rolls COATED (Paper, enameled, glazed or surface coated, NOI, not printed)			
	Skids COATED (Paper, enameled, glazed or surface coated, NOI, not printed)			
	Packages COATED (Paper, enameled, glazed or surface coated, NOI, not printed)			
	8 Drums (Soil & oil)			
	Non-Hazardous Material	6500		
	Emergency phone ~~##~~ 6-7398 Dow			
	Beth Krowl work # 782-5800 Ext 19			
	Home # 786-7231			

Subject to Section 7 of Conditions of applicable bill of lading, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of Consignor)

If charges are to be prepaid, write or stamp here; "To be Prepaid."

Received $ _____ to apply in prepayment of the charges on the property described hereon.

Agent or Cashier

Per _____ (The signature here acknowledges only the amount prepaid.)

Charges Advanced:
$

"Shipper's imprint in lieu of stamp; not a part of bill of lading approved by the Interstate Commerce Commission."

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.
NOTE—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per

SHIPPER'S NO. 0617

The Fibre Boxes used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of Uniform Freight Classification.

DECORATIVE SPECIALTIES INTERNATIONAL INC., Shipper, Per Lee Boehning

Agent, Per

Permanent postoffice address of shipper, BROWNVILLE, N.Y. 13615, U.S.A.

CES Certified Environmental Services, Inc.
1401 Erie Blvd. East
Syracuse, NY 13210
Phone 315-478-2374
Fax 315-478-2107

REPORT OF ANALYSES

AAPEX Environmental Services
P. O. Box 6415
Syracuse, NY 13217-6415
Attn: Mr. William Hickok

PROJECT NAME: Rexam DSI-Brownville, NY
DATE: 05/25/98

SAMPLE NUMBER- 161688 SAMPLE ID- 1/Center Surface
DATE SAMPLED- 05/20/98
DATE RECEIVED- 05/20/98 SAMPLER- Maril Lapdien
TIME RECEIVED- 1530 DELIVERED BY- William Hickok

SAMPLE MATRIX- SO
TIME SAMPLED- 1300
RECEIVED BY- CAM
TYPE SAMPLE- Grab

Page 1 of 1

ANALYSIS	METHOD	SAMPLE PREP DATE	BY	ANALYSIS DATE	TIME	BY	RESULT	UNITS
PCB'S IN SEDIMENT						KSH		
AROCLOR 1221	EPA 8080	05/26/98	BJC	06/27/98		KSH	< 2.0	mg/Kg
AROCLOR 1232	EPA 8080	05/26/98	BJC	05/27/98		KSH	< 2.0	mg/Kg
AROCLOR 1242/1016	EPA 8080	05/26/98	BJC	05/27/98		KSH	< 2.0	mg/Kg
AROCLOR 1248	EPA 8080	05/26/98	BJC	05/27/98		KSH	< 2.0	mg/Kg
AROCLOR 1254	EPA 8080	05/26/98	BJC	05/27/98		KSH	< 2.0	mg/Kg
AROCLOR 1260	EPA 8080	05/26/98	BJC	05/27/98		KSH	< 2.0	mg/Kg
TOTAL PETROLEUM HYDROCARBONS						BLD		
GASOLINE	DOH 310-13	05/26/98	BJC	05/27/98		BLD	< 2000	mg/Kg
KEROSENE	DOH 310-13	05/26/98	BJC	05/27/98		BLD	< 2000	mg/Kg
FUEL OIL	DOH 310-13	05/26/98	BJC	05/27/98		BLD	< 2000	mg/Kg
DIESEL	DOH 310-13	05/26/98	BJC	05/27/98		BLD	< 2000	mg/Kg
MOTOR OIL	DOH 310-13	05/26/98	BJC	05/27/98		BLD	20000	mg/Kg

NYSDOH LAB ID NO. 11246 APPROVED BY:

APPENDIX 51

Asbestos Survey

CES Certified Environmental Services, Inc.

1401 Erie Blvd. East
Syracuse, NY 13210
Phone 315-478-2374
Fax 315-478-2107

SURVEY FOR ASBESTOS-CONTAINING MATERIALS

Rexam DSI
Bridge Street
Brownville, New York 13615

CONDUCTED: August 8th & 9th, 2000

PREPARED FOR:

Mark Lappies, Plant Engineer
Rexam DSI
Bridge Street
Brownville, New York 13615

PREPARED BY:

Certified Environmental Services, Inc.
1401 Erie Boulevard East
Syracuse, New York 13210

(315) 478-2374

SUBMITTED: October 2, 2000

CES

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Summary of Findings	III	4
Conclusions & Recommendations	IV	7

Appendix A
Laboratory Analysis Reports & Sample Data Sheets

Appendix B
NYSDOH Laboratory Certificates of Approval

Appendix C
NYSDOL Building Demolition Survey Guidelines

Appendix D
Project Drawings

CES

SECTION I - Project Overview

In accordance with a request made by Mr. Mark Lappies of Rexam DSI, Certified Environmental Services, Inc. (CES) completed an asbestos survey the company's paper mill and associated warehouse located on Bridge Street, Brownville, New York 13615. Appendix D of this report includes project diagrams detailing the layout of the areas inspected.

Project services provided by CES included the following:

- Inspection of the interior and exterior of the subject property by a team of New York State Department of Labor (NYSDOL) certified asbestos Inspectors.
- The collection of bulk samples of materials suspected to potentially contain asbestos with subsequent analysis by New York State Department of Health (NYSDOH) approved laboratories.
- Preparation of this project report.

Asbestos survey services were completed for informational purposes. Inspection services were performed by New York State Department of Labor certified inspectors Ms. Nicole Copeland (NYSDOL Certificate No. AH 98-16223) and Mr. Sandy J. Allen (NYSDOL Certificate No. AH 97-16134).

Inspection services were completed on August 8 and 9, 2000. Each room or area was visually inspected. Materials suspected to potentially contain asbestos were identified, quantified, and sampled for subsequent laboratory analysis. Project diagrams were prepared to indicate the locations of asbestos-containing materials (ACM) identified as a result of CES's completed inspection. Estimated quantities of ACM identified by CES during the inspection were obtained using measurements made in the field by inspection personnel.

SECTION II - Methodologies

Inspection Procedures:

The inspection was carried out in general accordance with the requirements outlined in the New York State Department of Labor's (NYSDOL) asbestos regulation (12 NYCRR Part 56) as specified in SubPart 56-1, Section 56-1.9 "Building Demolition Survey".

Each area of the interior of the subject area was thoroughly inspected by visual means to identify

CES

SECTION II - Methodologies (Continued)

potential asbestos-containing materials (ACM). The survey was carried out in accordance with the requirements of 12 NYCRR Part 56, SubPart 56-1.9(b)(2)(3). This section of the regulation states that in the absence of applicable building plans or records, the identification of asbestos or asbestos material shall be by the sampling and analysis of suspect material with analysis by a New York State Department of Health (NYSDOH) certified laboratory (see 56-1.9(b)(2)) and the mapping out of all locations of asbestos or asbestos material (see 56-1.9(b)(3)).

Inspection personnel physically assessed each suspect material to determine whether it represented a friable, non-friable or non-friable organically bound (NOB) material. Bulk samples of each suspect material were then collected for subsequent laboratory analysis. A total of forty-two (42) bulk samples (CES Log Nos. 226593 through 226634) were collected and analyzed by CES as part of the completed inspection.

Analytical Procedures:

Polarized Light Microscopy (PLM) analytical services were completed by Certified Environmental Services, Inc. (NYSDOH ELAP No. 11246). Transmission Electron Microscopy (TEM) services were completed by O'Brien & Gere (OBG) Laboratories, Inc., 5000 Brittonfield Parkway, East Syracuse, New York 13057. OBG's NYSDOH ELAP Laboratory Identification Number is 10155.

Friable bulk samples were analyzed using the Stratified Point Count Method with Polarized Light Microscopy and Dispersion Staining (PLM/DS) techniques. Samples are first examined for homogeneity and preliminary fiber identification using a low powered stereoscopic binocular microscope. Positive identification of suspect fibers is made using the Polarized Light Microscope. In the event that discrete strata are identified in a sample, each is analyzed and the amount of asbestos quantified in that layer only. The results for each layer are then combined to yield an estimate of the asbestos content for the whole sample.

Non-Friable Organically Bound (NOB) materials (ie: roofing materials, floor tile, linoleum, mastic, etc.) were analyzed in accordance with NYSDOH ELAP Methods 198.1 and 198.4. These procedures were completed as detailed below:

Analytical Procedures:

A. Gravimetric Matrix Reduction & Polarized Light Microscopy (GMR / PLM)

1. All extraneous materials (i.e. mastic, wax polish) were removed prior to sample preparation. Mastic must be considered a separate sample and, if present, was removed for independent analysis. Approximately 100-500 mg of the NOB was shaved off into a tared crucible and weighed. The sample was placed in a muffle furnace at 480°C until the mass stabilized (~1-

CES

SECTION II - Methodologies (Continued)

12 hours). The sample was then cooled in a desiccator and re-weighed to calculate the percentage of organic loss. The residue was then placed in a crucible with 0.5 mL 0.1-μm-filtered distilled water and 2-5 mL of concentrated hydrochloric acid (HCl). After 15 minutes the residue was diluted with 0.1-μm-filtered distilled water and poured into a filtration apparatus loaded with a 0.4-μm polycarbonate filter and vacuum was applied. The crucible was rinsed a second time. When filtration was complete, the filter and residue were carefully transferred to a clean, tared plastic petri dish and allowed to dry to stable mass under a heat lamp. The filter and petri dish were then weighed to calculate the percent of mineral carbonate loss. If the residue mass was less than one-percent (<1%) of the subsample's original mass, analysis was terminated and the sample reported as non-ACM. If the mass was greater than one percent (>1%) of the sub-sample's original mass, a PLM analysis of the residue was initiated. If asbestos was detected as a result of the PLM analysis, and it was calculated that the overall percentage of asbestos in the sample was greater than 1 %, the material was considered asbestos-containing.

B. Transmission Electron Microscopy (TEM)

2. If the mass of the residue discussed in Item #1 was greater than one-percent (>1%), and no asbestos was detected as a result of completed GMR/PLM analysis, the residue was submitted for analysis by Transmission Electron Microscopy (TEM). Before NOB materials can be considered or treated as non-asbestos containing, confirmation by quantitative TEM procedures is required.

Copies of the New York State Department of Health Environmental Laboratory Approval Program (NYSDOH-ELAP) *Certificates of Approval* for Certified Environmental Services, Inc. and O'Brien & Gere Laboratories, Inc. are provided as Appendix B.

CES

SECTION III - Summary of Findings

Asbestos-containing materials (ACM) identified as a result of inspection efforts completed by CES included the following:

MAIN BUILDING - INTERIOR:

MATERIAL	LOCATION(S)	QUANTITY
FIRST FLOOR		
Pipe Fitting	Meter Room	5 FT^2
Transite Wall Boards *	Above Paper Machine - Lining of Penthouse Walls	1,280 FT^2
Wall Boards (Transite)	Office C on Project Drawing	260 FT^2
Brown Pebble Pattern Linoleum	Entrance to Office Floor, Stairs and Breeze Way	35 FT^2
SECOND FLOOR		
Interior Window Glaze	Supply Room - Metal Window	60 LF
THIRD FLOOR		
White Fluffy Debris	Around Outside of Abandoned Coal Boiler	~5 FT^2
Off-White Insulation Debris	Around Outside of Abandoned Coal Boiler	~5 FT^2
Coating over Brick	Outside of Abandoned Coal Boiler	~1,800 FT^2
OFFICE FLOOR		
Small Brown Pebble Pattern Linoleum	Area O-4 on Project Drawing Area O-5 on Project Drawing	870 FT^2 144 FT^2
Brown Pebble Pattern Linoleum	Area O-3 on Project Drawing	100 FT^2

* This area was not accessible at the time of the inspection and was not sampled, however, per Rexam DSI personnel there are transite panels in this area.

CES

SECTION III - Summary of Findings (Continued)

MAIN BUILDING - EXTERIOR:

MATERIAL	LOCATION(S)	QUANTITY
FIRST FLOOR		
Packing Material around Pipe at Penetration into Wall	Exterior 1st Floor Main Gas Supply	5 FT^2
Window Glaze (along glass panes)	Exterior 1st Level Windows Exterior 2nd Level Windows	1,560 LF 300 LF

WAREHOUSE - INTERIOR:

MATERIAL	LOCATION(S)	QUANTITY
INTERIOR		
Brown Pebble Pattern Linoleum	Area W-6 on Project Drawing	75 FT^2

WAREHOUSE - EXTERIOR:

MATERIAL	LOCATION(S)	QUANTITY
EXTERIOR		
Window Glaze (along glass panes)	Exterior of Windows	680 LF
Black Rolled Roofing	Hydrant Shed	36 FT^2

NOTES:

1. LF = Linear Feet
2. FT^2 = Square Feet
3. All quantities are estimates only and are to be verified by the abatement contractor.
4. Per Rexam DSI personnel, the roof of the main building and warehouse are rubber roofing over wood decking and was not sampled.

CES

SECTION III - Summary of Findings (Continued)

No additional asbestos-containing materials were identified by CES to be associated with the paper mill and warehouse located on Bridge Street, Brownville, New York 13615. Note that the two electrical rooms on the 3rd floor and the rooms in Area W-6 in the warehouse were not accessible at the time of the inspection. Also note that the interior of the abandoned coal boiler was not sampled and possibly contains asbestos containing materials. Materials associated with the subject area that were tested by CES and found to be non-asbestos containing, included the following:

1. Door and window caulk;
2. Fiberboard wall board;
3. Ceiling and wall plaster/cement;
4. Sheetrock wall;
5. Baseboard mastic;
6. Pipe insulation and fittings (except those noted on page 4);
7. Ceiling tiles;
8. Rolled roofing and flashing materials;
9. Floor tiles and linoleum throughout structures (except those noted on pages 4& 5);
10. Packing materials and gaskets to boilers;
11. Paper along the edge of the skylights.

NOTE: *Non-Friable Organically Bound (NOB) materials listed above as non-asbestos-containing, were confirmed to be non-ACM via Transmission Electron Microscopy (TEM) testing.*

Potential asbestos-containing materials which were inspected for as part of the pre-demolition asbestos survey completed by CES, as required by Section 56-1.9© of 12 NYCRR Part 56, included the following:

A) SURFACE TREATMENTS

- fire proofing
- acoustical plaster
- finish plasters

B) THERMAL SYSTEM INSULATION

- equipment insulation
- boiler/breaching/duct/tank insulation
- piping & fitting insulation

C) OTHER MATERIALS

- dust & debris
- vinyl asbestos tile
- ceiling tile
- gaskets/seals & sealants
- fire blankets
- cementitious board
- vibration isolators
- laboratory tables & hoods
- fire doors
- fire curtains

CES

SECTION III - Summary of Findings (Continued)

To the best of our knowledge and belief, the asbestos-containing materials identified by CES, as summarized in this report, represent all asbestos-containing materials associated with the paper mill and warehouse of Rexam DSI located on Bridge Street, Brownville, New York 13615.

SECTION IV - Conclusions & Recommendations

Typical Remedial Measures:

Listed below are the four (4) most common remedial actions generally available to prevent or limit the release of asbestos fibers from ACM.

1) **Implementation of an Operations & Maintenance (O&M) program:** Under this response action, a set of standard operating procedures is developed for use by in-house maintenance personnel. These procedures are developed to assist designated personnel in the clean-up of fibers previously released and to limit the potential for future asbestos exposure by instituting preventative measures (i.e. personnel training, material repair, special clean-up procedures, etc.).

2) **Encapsulation:** Utilization of this remedial action is intended to limit potential fiber release by chemical means. This is accomplished by creating an impermeable barrier between the material and the environment with a bridging encapsulant, or by using a penetrating encapsulant which binds the material and its fibers together in a hard matrix.

3) **Enclosure:** Enclosure of asbestos consists of constructing a permanent, physical, airtight impermeable barrier between the ACM and the environment. This is accomplished using material such as cement block, gypsum board, tongue and groove or spline jointed plywood, etc.

4) **Removal:** Removal of asbestos is the process by which ACM is stripped from its underlying substrate. Removal must be completed in a controlled manner to prevent building contamination. When completed properly, removal of ACM offers a permanent solution to the ACM problem by eliminating the material. However, removal can be very costly and time consuming. When done improperly, removal can result in significant contamination of a building or area and dramatically increase the potential for building occupants exposure to airborne asbestos fibers.

CES

SECTION IV - Conclusions & Recommendations (Continued)

Determining an appropriate remedial action is typically based on a hazard assessment which is prepared for ACM identified as a result of a completed building survey. These hazard assessments are generally based on several factors including the following:

1. Whether or not the material is friable;
2. The condition of the material (e.g. poor, fair, good);
3. The potential for disturbance of the material;
4. Activity in the area of the material (e.g. manufacturing processes, air movement, etc.);
5. Whether or not the area where the material is located is occupied.

Please refer to the following appendices for additional information:

Appendix A
Laboratory Analysis Reports & Bulk Sample Data Sheets

Appendix B
NYSDOH Laboratory Certificates of Approval

Appendix C
NYSDOL Building Demolition Survey Guidelines

Appendix D
Project Drawings

Any questions regarding the information contained in this report should be directed to Ms. Nicole R. Copeland at Certified Environmental Services, Inc. at (315) 478-2374.

CES

APPENDIX A

Laboratory Analysis Reports &
Bulk Sample Data Sheets

CES Certified Environmental Services, Inc.

1401 Erie Blvd. East
Syracuse, NY 13210
Phone 315-478-2374
Fax 315-478-2107

To: REXAM DSI
BRIDGE STREET
BROWNVILLE, NY 13615

Date: August 21, 2000

Attention: MR. MARK LAPPIES

PROJECT: BRIDGE STREET-BROWNVILLE, NY

CES LOG #	CLIENT/FIELD ID	DATE COLLECTED	TYPE OF MATERIAL, FRIABLE OR NON-FRIABLE	LAYERS	COLOR	ASBESTOS %	ASBESTOS TYPE	OTHER %	OTHER TYPE	FINAL ASBESTOS %
226613	RD-810-03	08/10/00	FIBERBOARD WALL FRIABLE	1	GRAY			100	CELLULOSE	
226614	RD-810-04	08/10/00	SHEETROCK WALL FRIABLE	1	GRAY/ BROWN			20 80	CELLULOSE GYPSUM	
226615	RD-810-07	08/10/00	WALL CEMENT/PLASTER NON-FRIABLE	1	GRAY			10 35 55	SYNTHETIC GYPSUM QUARTZ	
226616	RD-810-10	08/10/00	2 X 4 WHITE SQUARE CEILING TILE FRIABLE	1	TAN			100	CELLULOSE	
226617	RD-810-11	08/10/00	SHEETROCK WALL FRIABLE	1	GRAY			35 65	CELLULOSE GYPSUM	
226618	RD-810-13	08/10/00	CEILING CEMENT/PLASTER NON-FRIABLE	1	GRAY			30 70	GYPSUM QUARTZ	
226619	RD-810-14	08/10/00	WALL BOARD NON-FRIABLE	1	GRAY	44	CHRYSOTILE	30 26	GYPSUM BINDER	44
226620	RD-810-16	08/10/00	2 X 4 TEXTURED CEILING TILE FRIABLE	1	GRAY			55 25 20	CELLULOSE GLASS WOOL PERLITE	

ANALYSIS METHOD: Polarized Light Microscopy with Dispersion Staining (EPA -600/M4-82-020/NYS-DOH 198.1)

CES does warrant that laboratory or field services completed by its employees for this report were conducted in accordance with the environmental services and analytical industries recognized methods or standards. CES does not assume any other liabilities other than re-performance of work if completed services were determined to be deficient due to the negligence of CES. CES will not accept any liability in whole or in part as a result of data interpretation by the client.

NYSDOH LAB ID #11246

APPROVED BY:

CES Certified Environmental Services, Inc.

1401 Erie Blvd. East
Syracuse, NY 13210
Phone 315-478-2374
Fax 315-478-2107

To: REXAM DSI
BRIDGE STREET
BROWNVILLE, NY 13615

Date: August 21, 2000

Attention: MR. MARK LAPPIES

PROJECT: BRIDGE STREET-BROWNVILLE, NY

CES LOG #	CLIENT/FIELD ID	DATE COLLECTED	TYPE OF MATERIAL, FRIABLE OR NON-FRIABLE	LAYERS	COLOR	ASBESTOS		OTHER		FINAL ASBESTOS
						%	TYPE	%	TYPE	%
226621	RD-810-18	08/10/00	SHEETROCK WALL FRIABLE	1	GRAY/ BROWN			15 45 40	CELLULOSE TALC GYPSUM	
226622	RD-810-22	08/10/00	PIPE WRAP FRIABLE	1	BROWN			100	SYNTHETIC	
226623	RD-810-23	08/10/00	FIBERBOARD FRIABLE	1	GRAY			100	CELLULOSE	
226624	RD-810-26	08/10/00	BOILER DRUM INSULATION FRIABLE	1	GRAY			90 10	GYPSUM STONE	
226625	RD-810-27	08/10/00	SHEETROCK CEILING W/ TEXTURED COATING FRIABLE	1	GRAY			10 90	CELLULOSE GYPSUM	
226626	RD-810-28	08/10/00	PACKING MATERIAL IN BOILER SEAMS NON-FRIABLE	1	GRAY			25 45 30	CELLULOSE GYPSUM BINDER	
226627	RD-810-29	08/10/00	GASKET FITTING IN BOILER FRIABLE	1	GRAY			100	GLASS WOOL	
226628	RD-810-30	08/10/00	PIPE FITTING FRIABLE	1	GRAY	27	CHRYSOTILE	15 58	CELLULOSE GYPSUM	27

ANALYSIS METHOD: Polarized Light Microscopy with Dispersion Staining (EPA -600/M4-82-020/NYS-DOH 198.1)

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BROWNVILLE, NY 13615

Date: August 21, 2000

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PROJECT: BRIDGE STREET-BROWNVILLE, NY

CES LOG #	CLIENT/FIELD ID	DATE COLLECTED	TYPE OF MATERIAL, FRIABLE OR NON-FRIABLE	LAYERS	COLOR	ASBESTOS %	ASBESTOS TYPE	OTHER %	OTHER TYPE	FINAL ASBESTOS %
226629	RD-810-32	08/10/00	SHEETROCK WALL FRIABLE	1	GRAY			5 50 45	GLASS WOOL TALC GYPSUM	
226630	RD-810-34	08/10/00	MATERIAL FROM INSIDE EDGE FRIABLE	1	TAN			100	CALCITE	
226631	RD-810-35	08/10/00	DEBRIS-WHITE FLUFFY FRIABLE	1	GRAY	36	CHRYSOTILE	64	GYPSUM	36
226632	RD-810-36	08/10/00	DEBRIS-OFF WHITE INSULATION FRIABLE	1	GRAY	67	CHRYSOTILE	33	GYPSUM	67
226633	RD-810-38	08/10/00	SHEETROCK WALL FRIABLE	1	GRAY/ BROWN			25 75	CELLULOSE GYPSUM	
226634	RD-810-42	08/10/00	SHEETROCK WALL FRIABLE	1	GRAY			10 90	CELLULOSE GYPSUM	

ANALYSIS METHOD: Polarized Light Microscopy with Dispersion Staining (EPA -600/M4-82-020/NYS-DOH 198.1)

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NYSDOH LAB ID #11246

APPROVED BY:

CES Certified Environmental Services, Inc.

1401 Erie Blvd. East
Syracuse, NY 13210
Phone 315-478-2374
Fax 315-478-2107

To: REXAM DSI
BRIDGE STREET
BROWNVILLE, NY 13165

Date: August 21, 2000

Attention: MR. MARK LAPPIES

PROJECT: BRIDGE STREET-BROWNVILLE, NY

ASBESTOS IN NON-FRIABLE ORGANICALLY BOUND MATERIALS (NOB) ANALYSIS REPORT

CES LOG #	CLIENT/FIELD ID	DATE COLLECTED	MATERIAL	PERCENT WEIGHT OF ORIGINAL SAMPLE REMAINING AFTER NOB PREP	PLM EXAMINATION		TEM EXAMINATION		FINAL ASBESTOS %
					%	TYPE	%	TYPE	
226593	RD-810-01	08/10/00	WINDOW GLAZE	13.3	18.2	CHRYSOTILE			2.4
226594	RD-810-02	08/10/00	DOOR CAULK	15.6	<1.0	ND	*<1.0	ND	<1.0
226595	RD-810-05	08/10/00	BASEBOARD MASTIC	50.4	<1.0	ND	*<1.0	ND	<1.0
226596	RD-810-06	08/10/00	BROWN PEBBLE LINOLEUM	28.8	57.1	CHRYSOTILE			16.4
226597	RD-810-08	08/10/00	TAN SQUARE LINOLEUM	18.1	<1.0	ND	*2.0	CHRYSOTILE	<1.0
226598	RD-810-09	08/10/00	SMALL BROWN PEBBLE LINOLEUM	24.9	40.0	CHRYSOTILE			10.0
226599	RD-810-12	08/10/00	WINDOW CAULK	3.1	<1.0	ND	*<1.0	ND	<1.0

*TEM analysis performed by ELAP #10155. ND - None Detected

Note: CES personnel did not participate in the collection of the samples contained in this report.

Polarized-light microscopy is not consistently reliable in detecting asbestos in floor coverings and similar non-friable organically bound materials. Quantitative transmission electron microscopy is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos containing.

ANALYSIS METHOD: ELAP Item Number 198.1 and 198.4

CES does warrant that laboratory or field services completed by its employees for this report were conducted in accordance with the environmental services and analytical industries recognized methods or standards. CES does not assume any other liabilities other than re-performance of work if completed services were determined to be deficient due to the negligence of CES. CES will not accept any liability in whole or in part as a result of data interpretation by the client.

NYSDOH LAB ID #11246

APPROVED BY:

CES Certified Environmental Services, Inc.

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Syracuse, NY 13210
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Fax 315-478-2107

To: REXAM DSI
BRIDGE STREET
BROWNV ILLE, NY 13165

Date: August 21, 2000

Attention: MR. MARK LAPPIES

PROJECT: BRIDGE STREET-BROWNVILLE, NY

ASBESTOS IN NON-FRIABLE ORGANICALLY BOUND MATERIALS (NOB) ANALYSIS REPORT

CES LOG #	CLIENT/FIELD ID	DATE COLLECTED	MATERIAL	PERCENT WEIGHT OF ORIGINAL SAMPLE REMAINING AFTER NOB PREP	PLM EXAMINATION		TEM EXAMINATION		FINAL ASBESTOS %
					%	TYPE	%	TYPE	
226600	RD-810-15	08/10/00	PIPE FITTING	10.8	<1.0	ND	*<1.0	ND	<1.0
226601	RD-810-17	08/10/00	BASEBOARD MASTIC	15.7	<1.0	ND	*<1.0	ND	<1.0
226602	RD-810-19	08/10/00	WINDOW GLAZE	48.4	<1.0	ND	*<1.0	ND	<1.0
226603	RD-810-20	08/10/00	ROLLED ROOFING	27.6	<1.0	ND	*<1.0	ND	<1.0
226604	RD-810-21	08/10/00	FLASHING	11.3	<1.0	ND	*<1.0	ND	<1.0
226605	RD-810-24	08/10/00	GRAY & WHITE PEBBLE PATTERN LINOLEUM	7.7	<1.0	ND	*<1.0	ND	<1.0
226606	RD-810-25	08/10/00	12 X 12 BLUE FLOOR TILE	4.7	<1.0	ND	*<1.0	ND	<1.0

*TEM analysis performed by ELAP #10155. ND - None Detected

Note: CES personnel did not participate in the collection of the samples contained in this report.

Polarized-light microscopy is not consistently reliable in detecting asbestos in floor coverings and similar non-friable organically bound materials. Quantitative transmission electron microscopy is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos containing.

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ASBESTOS IN NON-FRIABLE ORGANICALLY BOUND MATERIALS (NOB) ANALYSIS REPORT

CES LOG #	CLIENT/FIELD ID	DATE COLLECTED	MATERIAL	PERCENT WEIGHT OF ORIGINAL SAMPLE REMAINING AFTER NOB PREP	PLM EXAMINATION		TEM EXAMINATION		FINAL ASBESTOS
					%	TYPE	%	TYPE	%
226607	RD-810-31	08/10/00	PACKING MATERIAL AT PIPE	42.3	11.4	CHRYSOTILE			4.8
226608	RD-810-33	08/10/00	INTERIOR WINDOW GLAZE	7.9	<1.0	ND	*50.0	ANTHOPHYLLITE	4.0
226609	RD-810-37	08/10/00	COATING OVER BRICK	32.5	36.4	CHRYSOTILE			11.8
226610	RD-810-39	08/10/00	PAPER FROM SKYLIGHTS	5.6	<1.0	ND	*<1.0	ANTHOPHYLLITE	<1.0
226611	RD-810-40	08/10/00	BLACK ROLLED ROOFING	14.5	18.2	CHRYSOTILE			2.6
226612	RD-810-41	08/10/00	BASEBOARD MASTIC	20.0	<1.0	ND	*<1.0	ND	<1.0

*TEM analysis performed by ELAP #10155. ND - None Detected

Note: CES personnel did not participate in the collection of the samples contained in this report.

Polarized-light microscopy is not consistently reliable in detecting asbestos in floor coverings and similar non-friable organically bound materials. Quantitative transmission electron microscopy is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos containing.

ANALYSIS METHOD: ELAP Item Number 198.1 and 198.4

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NYSDOH LAB ID #11246

APPROVED BY:

(67994 6[illegible]) 39108 PO # 1C 07

CES | Certified Environmental Services, Inc.

BULK SAMPLE LOG

1401 Erie Boulevard East
Syracuse, New York 13210
Ph (315) 478 - 2374 Fax (315) 478 - 2107

Client: Rexam DSI Contact: Mark Lappies Analyte: Asbestos Date: 8/10/00

Project Information: Bridge St., Brownville, N.Y. Phone #: 782-5800 ~~Fax~~ Results to: Nicole Copeland

FIELD ID NUMBER	CES LOG NUMBER	SAMPLE LOCATION	SAMPLE DESCRIPTION	SAMPLE TYPE	POS (+) or NEG (-)
RD-810-01	226613	Warehouse - Exterior	Window Glaze	NOB	Pos
RD-810-02	226594	Warehouse - Exterior	Door Caulk	NOB	NEG
RD-810-03	~~226613~~ 226613	Warehouse - Area W-3	Fiberboard (Wall)	F	
RD-810-04	226614	Warehouse - Area W-6	Sheetrock Wall	F	
RD-810-05	226595	Warehouse - Area W-6	Baseboard Mastic	NOB	NEG
RD-810-06	226596	Office Floor - Area O-3	Brown Pebble Linoleum	NOB	Pos
RD-810-07	226615	Office Floor - Area O-3	Wall Cement / Plaster	NF	
RD-810-08	226597	Office Floor - Area O-2	Tan Square Linoleum	NOB	NEG
RD-810-09	226598	Office Floor - Area O-4	Small Brown Pebble Linoleum	NOB	Pos
RD-810-10	226616	Office Floor - Area O-4	2x4 White Square Pattern Ceiling Tile	F	

Sample Type: F = Friable, NF = Non-Friable, NOB = Non-Friable Organically Bound

CHAIN-OF-CUSTODY	PRINT NAME	SIGN NAME	DATE	TIME
Sampled By:	Nicole Copeland / Sandy J. Allen		8/10/00	
Relinquished By:	Nicole Copeland		8/14/00	1000
Received at Lab By:	Ronald M. Fossett		8/14/00	10:00

TURNAROUND TIME: ☐ RUSH ☐ 12 HOUR ☐ 24 HOUR ☐ 48 HOUR ☐ 72 HOUR ☐ 5 DAY ☐ 10 DAY

39908

CES	Certified Environmental Services, Inc.	**BULK SAMPLE LOG**	1401 Erie Boulevard East Syracuse, New York 13210 Ph (315) 478 - 2374 Fax (315) 478 - 2107

ient: Rexam DSI Contact: Mark Lappies Analyte: Asbestos Date: 8/10/00

oject Information: Bridge St., Brownville, N.Y. Phone #: 782-5800 Fax Results to: Nicole-Copeland

FIELD ID NUMBER	CRS LOG NUMBER	SAMPLE LOCATION	SAMPLE DESCRIPTION	SAMPLE TYPE	POS (+) or NEG (-)
D-810-11	226617	Office Floor - Area 0-9	Sheetrock Wall	F	
D-810-12	226599	Office Floor - Area 0-3	Window Caulk	F NOB	NEG
D-810-13	226618	Office Floor - Area 0-4	Ceiling Cement Plaster	NF	
D-810-14	226619	1st Floor - Office C	Wall Board	NF	
D-810-15	226600	1st Floor - West End Paper Machine	Pipe Fitting	F NOB	NEG
D-810-16	226620	1st Floor - Mens Locker Rm	2x4 textured ceiling tile	F	
D-810-17	226601	1st Floor - Mens Locker Rm	Baseboard Mastic	NOB	NEG
D-810-18	226621	1st Floor - Breakroom	Sheetrock Wall	F	
D-810-19	226602	Exterior - 1st Level	Window Glaze	NOB	NEG
D-810-20	226603	1st Floor - Lab A Exterior	Rolled Roofing	NOB	NEG

mple Type: F = Friable, NF = Non-Friable, NOB = Non-Friable Organically Bound

HAIN-OF-CUSTODY	PRINT NAME	SIGN NAME	DATE	TIME
mpled By:	Nicole Copeland / Sandy J. Allen		8/10/00	
linquished By:	Nicole Copeland		8/14/00	1000
ceived at Lab By:	Ronald M. Fassett		8/14/00	10:00

RNAROUND TIME: ☐ RUSH ☐ 12 HOUR ☐ 24 HOUR ☐ 48 HOUR ☐ 72 HOUR ☐ 5 DAY ☐ 10 DAY

39908

CES | Certified Environmental Services, Inc.

BULK SAMPLE LOG

1401 Erie Boulevard East
Syracuse, New York 13210
Ph (315) 478 - 2374 Fax (315) 478 - 2107

ent: Rexam DSI Contact: Mark Lappies Analyte: Asbestos Date: 8/10/00

ject Information: Bridge St., Brownville, N.Y. Phone #: 782-5800 ~~Fax~~ Results to: Nicole Copeland

FIELD ID NUMBER	CES LOG NUMBER	SAMPLE LOCATION	SAMPLE DESCRIPTION	SAMPLE TYPE	POS (+) or NEG (-)
D-810-21	226604	1st Floor - Lab A Exterior	Flashing	NOB	NEG
D-810-22	226622	1st Floor - Above Lab A	Pipe Wrap	F	
D-810-23	226623	1st Floor - Below Lab A	Fiberboard	F	
D-810-24	226605	1st Floor - Lab A	Gray White Pebble Pattern Linoleum	NOB	NEG
D-810-25	226606	1st Floor - Lab C	12x12 Blue Floor Tile	NOB	NEG
D-810-26	226624	1st Floor - Boiler Room	Boiler Drum Insulation	F	
D-810-27	226625	1st Floor - Boiler Room	Sheetrock Ceiling (w/ textured Coating)	F	
D-810-28	226626	1st Floor - Boiler Room	Packing Material in Seams Behind	NF	
D-810-29	226627	1st Floor - Boiler Room	Gasket Fitting - N. Boiler	F	
D-810-30	226628	1st Floor - Meter Room	Pipe Fitting	F	

mple Type: F = Friable, NF = Non-Friable, NOB = Non-Friable Organically Bound

AIN-OF-CUSTODY	PRINT NAME	SIGN NAME	DATE	TIME
mpled By:	Nicole Copeland / Sandy J. Allen		8/10/00	
linquished By:	Nicole Copeland		8/14/00	1000
ceived at Lab By:	Ronald M. Fassett		8/14/00	10:40

RNAROUND TIME: ☐ RUSH ☐ 12 HOUR ☐ 24 HOUR ☐ 48 HOUR ☐ 72 HOUR ☐ 5 DAY ☐ 10 DAY

39908

CES — Certified Environmental Services, Inc.

BULK SAMPLE LOG

1401 Erie Boulevard East
Syracuse, New York 13210
Ph (315) 478 - 2374 Fax (315) 478 - 2107

Client: Rexam DSI Contact: Mark Lappies Analyte: Asbestos Date: 8/10/00

Project Information: Bridge St., Brownville, N.Y. Phone #: 782-5800 Fax Results to: Nicole Copeland

FIELD ID NUMBER	CES LOG NUMBER	SAMPLE LOCATION	SAMPLE DESCRIPTION	SAMPLE TYPE	POS (+) or NEG (-)
RD-810-31	226607	1st Floor-Main Gas Supply Exterior	Packing Material @ Pipe	F NOB	Pos
RD-810-32	226629	2nd Floor - Elevator	Sheetrock Wall	F	
RD-810-33	226608	2nd Floor - Supply Room	Interior Window Glaze	NOB	NEG
RD-810-34	226630	3rd Floor - Abanoned Coal Boiler	Material from Inside Edge	F	
RD-810-35	226631	3rd Floor - Abanoned Coal Boiler	Debris - White Fluffy	F	
RD-810-36	226632	3rd Floor - Abanoned Coal Boiler	Debris - Off White Insulation	F	
RD-810-37	226609	3rd Floor - Abanoned Coal Boiler	Coating Over Brick	F NOB	Pos
RD-810-38	226633	3rd Floor - Mezzanine	Sheetrock Wall	F	
RD-810-39	226610	Exterior - Roof Area	Paper from Skylights	F NOB	NEG
RD-810-40	226611	Warehouse - Hydrant Shed	Black Rolled Roofing	NOB	Pos

Sample Type: F = Friable, NF = Non-Friable, NOB = Non-Friable Organically Bound

CHAIN-OF-CUSTODY	PRINT NAME	SIGN NAME	DATE	TIME
Sampled By:	Nicole Copeland / Sandy J. Allen		8/10/00	
Relinquished By:	Nicole Copeland		8/14/00	1000
Received at Lab By:	Ronald M. Fossett		8/14/00	10:00

TURNAROUND TIME: ☐ RUSH ☐ 12 HOUR ☐ 24 HOUR ☐ 48 HOUR ☐ 72 HOUR ☐ 5 DAY ☐ 10 DAY

39908

CES | Certified Environmental Services, Inc.

BULK SAMPLE LOG

1401 Erie Boulevard East
Syracuse, New York 13210
Ph (315) 478 - 2374 Fax (315) 478 - 2107

ent: Rexam DSI Contact: Mark Lappies Analyte: Asbestos Date: 8/10/00

oject Information: Bridge St., Brownville, N.Y. Phone #: 782-5800 ~~Fax~~ Results to: Nicole Copeland

FIELD ID NUMBER	CES LOG NUMBER	SAMPLE LOCATION	SAMPLE DESCRIPTION	SAMPLE TYPE	POS (+) or NEG (-)
D-810-41	226612	1st Floor - Breakroom	Baseboard Mastic	NOB	NEG
D-810-42	226634	1st Floor - Electrical Panel Room	Sheetrock Wall	F	

mple Type: F = Friable, NF = Non-Friable, NOB = Non-Friable Organically Bound

HAIN-OF-CUSTODY	PRINT NAME	SIGN NAME	DATE	TIME
mpled By:	Nicole Copeland / Sandy J. Allen		8/10/00	
elinquished By:	Nicole Copeland		8/14/00	1600
eceived at Lab By:	Ronald M. Fassett		8/14/00	10:00

RNAROUND TIME: ☐ RUSH ☐ 12 HOUR ☐ 24 HOUR ☐ 48 HOUR ☐ 72 HOUR ☐ 5 DAY ☐ 10 DAY

CES

APPENDIX B

NYS Department of Health
Laboratory Certificates of Approval

NEW YORK STATE DEPARTMENT OF HEALTH

ANTONIA C. NOVELLO, M.D., M.P.H. Commissioner

Expires 12:01 AM April 1, 2001
ISSUED April 1, 2000
REVISED July 11, 2000

CERTIFICATE OF APPROVAL FOR LABORATORY SERVICE

Issued in accordance with and pursuant to section 502 Public Health Law of New York State

Lab ID No.: 11246

Director: MR. PATRICK LEONE JR
Lab Name: CERTIFIED ENVIRONMENTAL SERVICES INC
Address : 1401 ERIE BOULEVARD EAST
SYRACUSE NY 13210

Is hereby APPROVED as an Environmental Laboratory for the category

ENVIRONMENTAL ANALYSES/SOLID AND HAZARDOUS WASTE

All approved subcategories and/or analytes are listed below:

aracteristic Testing :
Ignitability
Reactivity
[illegible]
Metals Only
. Toxicity - Metals Only
rgeable Halocarbons (ALL)

Miscellaneous :
Asbestos in Friable Material
Cyanide, Total
Lead in Paint
Hydrogen Ion (pH)
Sulfide (as S)

Acrolein and Acrylonitrile (ALL)
Chlorinated Hydrocarbons (ALL)
Metals I (ALL)
Nitroaromatics Isophorone (ALL)
Polychlorinated Biphenyls (ALL)
Priority Pollutant Phenols (ALL)

Chlor. Hydrocarbon Pesticides (ALL)
Haloethers (ALL)
Metals II (ALL)
Polynuclear Arom. Hydrocarbon (ALL)
Phthalate Esters (ALL)
Purgeable Aromatics (ALL)

Serial No.: 107176

Wadsworth Center

Property of the New York State Department of Health. Valid only at the address shown.
Must be conspicuously posted. Valid certificate has a red serial number.

NEW YORK STATE DEPARTMENT OF HEALTH

ANTONIA C. NOVELLO, M.D., M.P.H. Commissioner

Expires 12:01 AM April 1, 2001
ISSUED April 1, 2000
REVISED August 1, 2000

CERTIFICATE OF APPROVAL FOR LABORATORY SERVICE

Issued in accordance with and pursuant to section 502 Public Health Law of New York State

Lab ID No.: 10155

Director: MR. DAVID HILL
Lab Name: OBG LABS - ENVIRONMENTAL DIV
Address : 5000 BRITTONFIELD PKY, STE 300
SYRACUSE NY 13057

is hereby APPROVED as an Environmental Laboratory for the category

ENVIRONMENTAL ANALYSES/SOLID AND HAZARDOUS WASTE

All approved subcategories and/or analytes are listed below:

laneous :
estos in Friable Material
estos in Non-Friable Materia
nide, Total
Paint
Ion (pH)
(as S)

Characteristic Testing :
Corrosivity
Ignitability
Reactivity
TCLP
E.P. Toxicity
Purgeable Halocarbons (ALL)

Acrolein and Acrylonitrile (ALL)
Chlorinated Hydrocarbons (ALL)
Metals I (ALL)
Nitroaromatics Isophorone (ALL)
Polychlorinated Biphenyls (ALL)
Priority Pollutant Phenols (ALL)
Volatile Chlorinate Organics (ALL)

Chlor. Hydrocarbon Pesticides (ALL)
Haloethers (ALL)
Metals II (ALL)
Polynuclear Arom. Hydrocarbon (ALL)
Phthalate Esters (ALL)
Purgeable Aromatics (ALL)

ial No.: 107707

Wadsworth Center

Property of the New York State Department of Health. Valid only at the address shown.
Must be conspicuously posted. Valid certificate has a red serial number.

DOH-3317 (3/97)

CES

APPENDIX C

NYS Department of Labor
Pre-Demolition Asbestos Survey Guidelines

CES

The following requirements have been established by the New York State Department of Labor (NYSDOL) for conducting building demolition surveys. These requirements are outlined in the Department's asbestos regulation (see 12 NYCRR Part 56, Subpart 56-1.9).

56-1.9 Building Demolition Survey. (a) Survey required. Prior to advertising for bids or contracting for or commencing work on any demolition work on a building, except an agricultural building or a building the construction of which was begun on or after January 1, 1974, an owner and his/her agents, except the owner of one and two-family dwellings who contracts for but does not direct or control the work, shall conduct or cause to be conducted a survey to determine whether or not the building or portion thereof to be demolished contains asbestos or asbestos material as defined in section 56-1.4. All such surveys shall be conducted in conformance with the requirements of paragraph (b) of this section.

(b) Building survey requirements. The survey shall include the inspection for and identification of all asbestos or asbestos material throughout the building or portion thereof to be demolished. The required inspection shall be performed by a certified inspector, and, at a minimum, shall include identification of asbestos or asbestos material by the following methods:

1) The review of building plans and records, if available, for references to asbestos or asbestos material used in construction, renovation or repair.

2) The sampling of suspect material and subsequent analysis by a laboratory that meets the requirements of 56-17.4 (ie: certified by the New York State Department of Health (NYSDOH) for the selected methodology of sampling and analysis of asbestos).

3) The mapping out of locations of asbestos or asbestos material (identified as a result of the building inspection).

(c) Building Survey Information. 1. The survey shall, at a minimum, identify and assess the condition of the following types of installations relative to the asbestos or asbestos material contained therein:

A) SURFACE TREATMENTS

- fire proofing
- acoustical plaster
- finish plasters

B) THERMAL SYSTEM INSULATION

- equipment insulation
- boiler/breaching/duct/tank insulation
- piping & fitting insulation

C) OTHER MATERIALS

- dust & debris
- vinyl asbestos tile
- ceiling tile
- gaskets/seals & sealants
- fire blankets
- cementitious board
- vibration isolators
- laboratory tables & hoods
- fire doors
- fire curtains

NYSDOL PRE-DEMOLITION SURVEY GUIDELINES (Cont'd)

D) ROOFING AND SIDING

- felts
- transite, cementitious board
- flashing
- shingles
- galbestos

2. All asbestos or asbestos material reported under paragraph (1) of this subdivision shall include an estimate of the quantities, types, and condition of same.

3. The building survey shall also include the building location/identity, the building owner's name and address, the name and address of the owner's agent and the party performing the survey, the date(s) of the survey and the laboratory used for analysis of samples taken during the survey.

(d) Transmittal of building survey information. Information derived from the building survey shall be immediately transmitted by the building owner or his/her agent to the commissioner through the Department's Division of Safety and Health, Asbestos Control Bureau, and to the local government entity charged with issuing a permit for such demolition under applicable state or local laws or, if no such permit is required, to the town or city clerk where the building is located.

(e) Abatement required. If the building survey finds that a building to be demolished contains asbestos or asbestos material as defined in Section 56-1.4 of this Subpart, no bids shall be advertised nor contracts awarded nor demolition work commenced by any owner or agent prior to completion of an asbestos remediation contract performed by a licensed asbestos contractor, in conformance with all standards set forth in this Part (rule).

CES

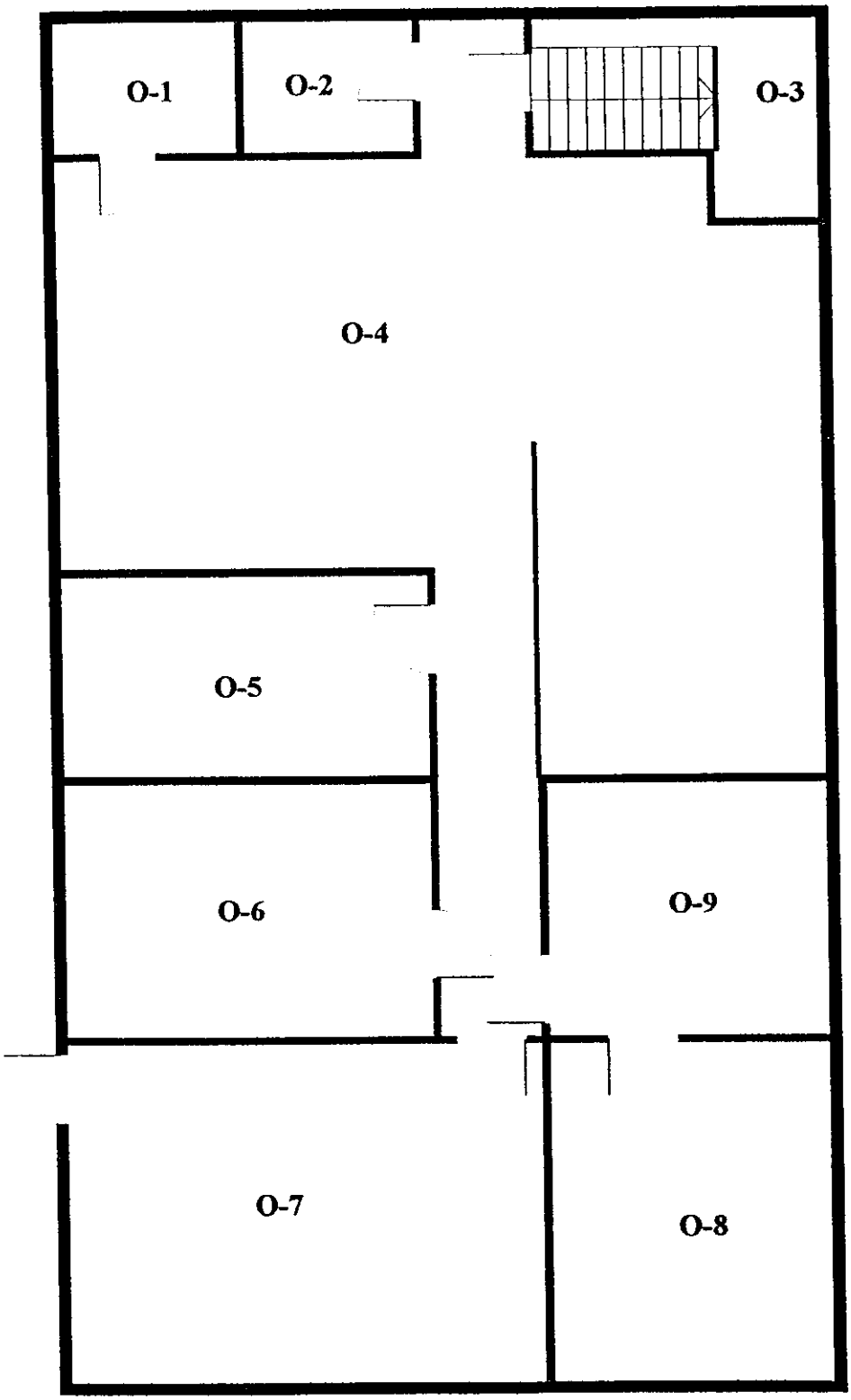
APPENDIX D

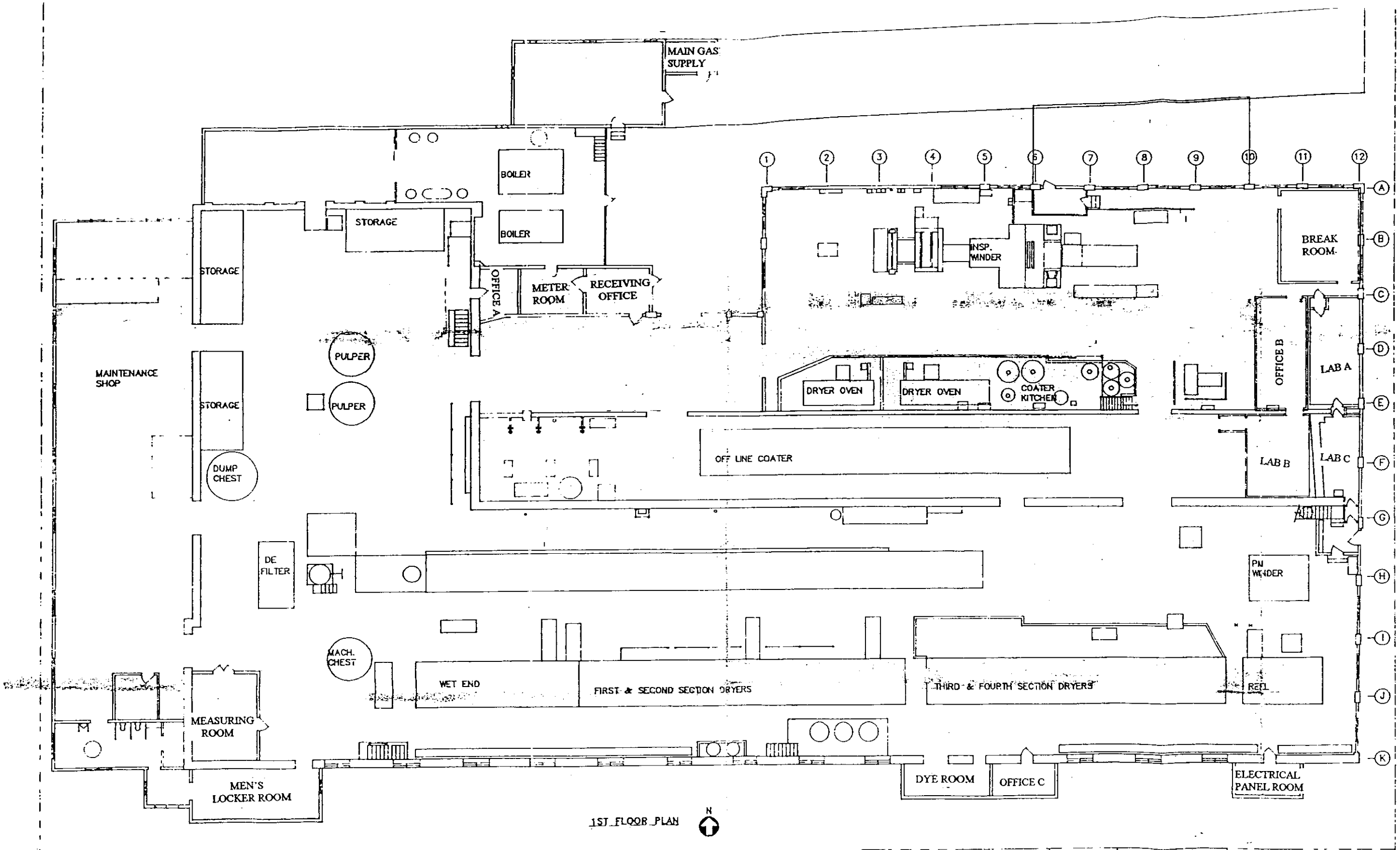
Project Drawings

ASBESTOS SURVEY - REXAM DSI

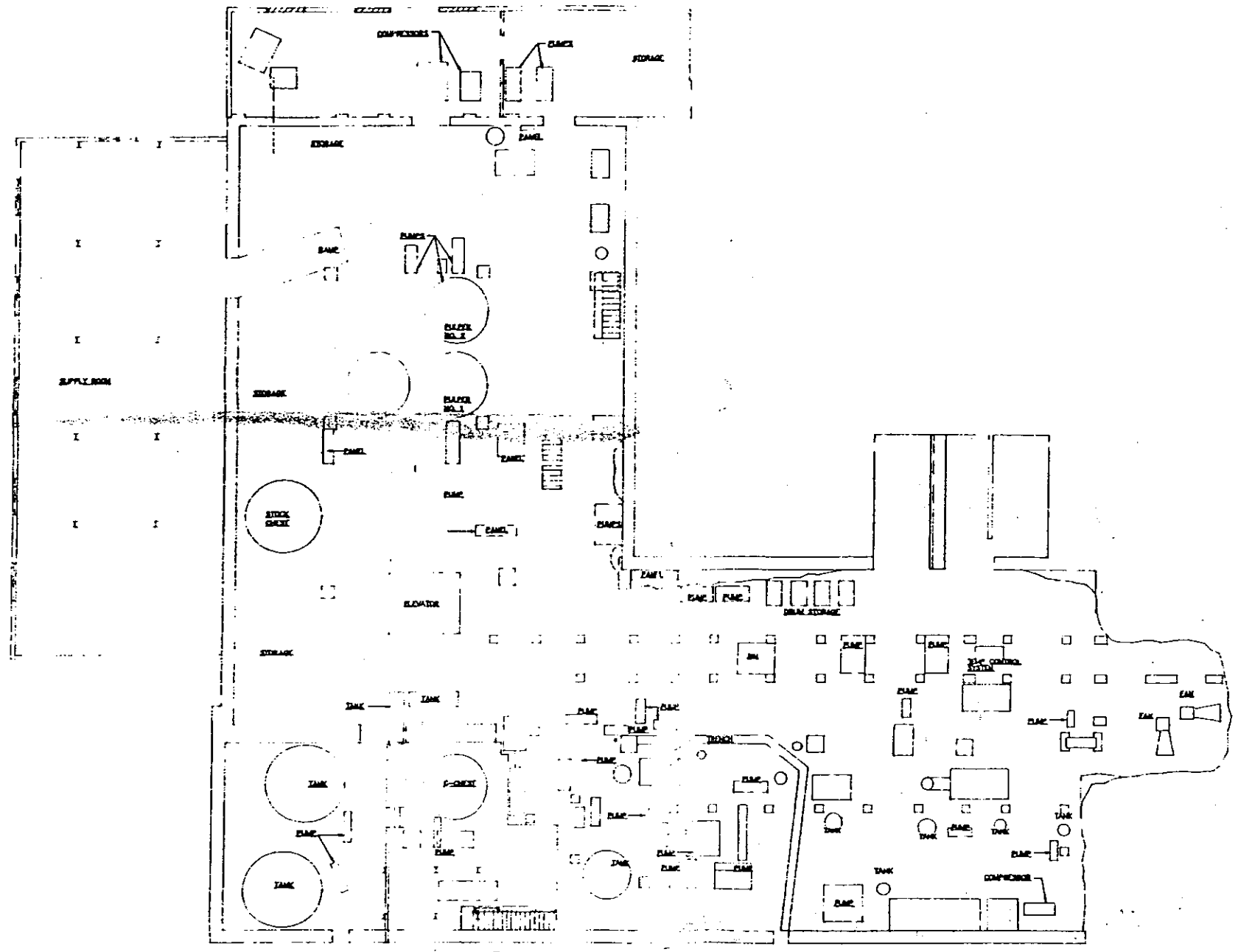
Bridge Street
Brownville, New York

Office Floor Plan



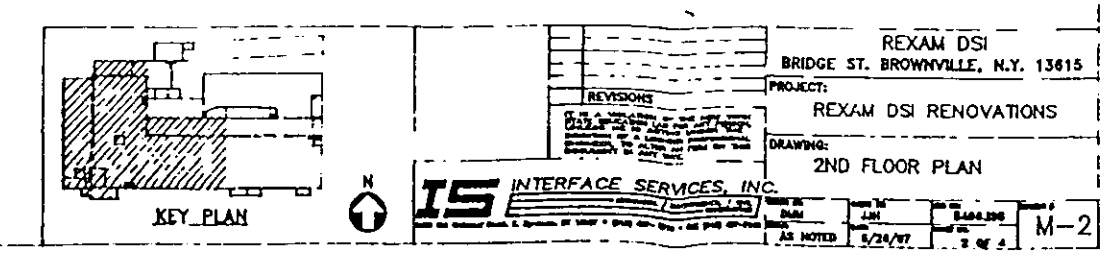


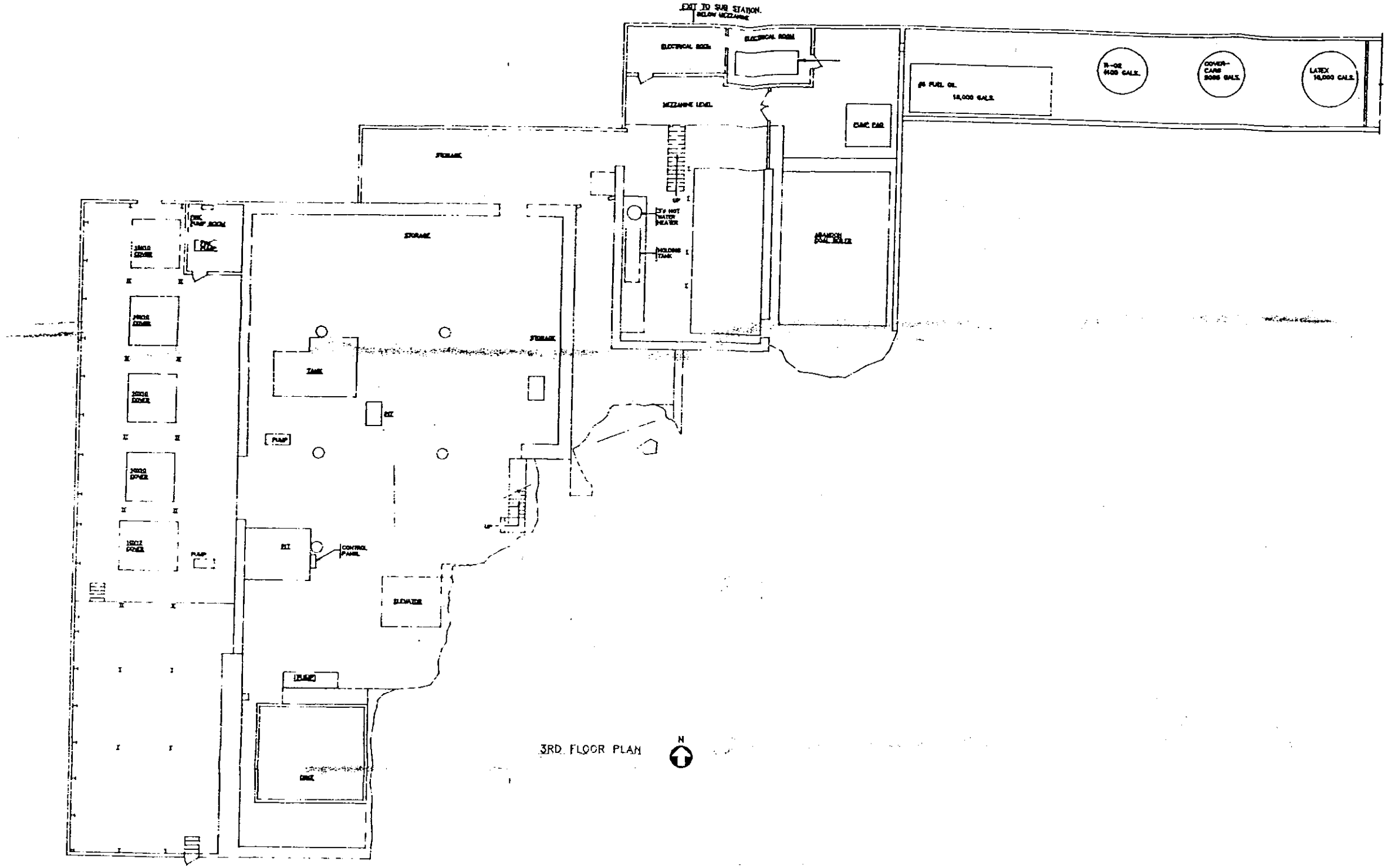
Note: The original drawing were provided by Rexam DSI and were modified only for the purpose of this report as a reference tool. The drawing is NOT TO SCALE.



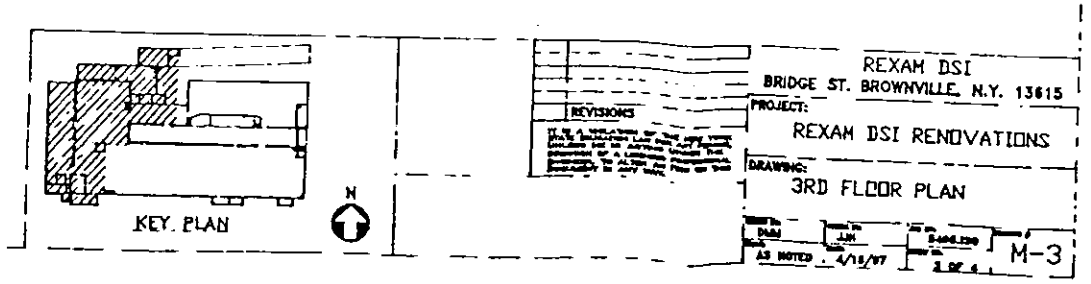
2ND FLOOR PLAN

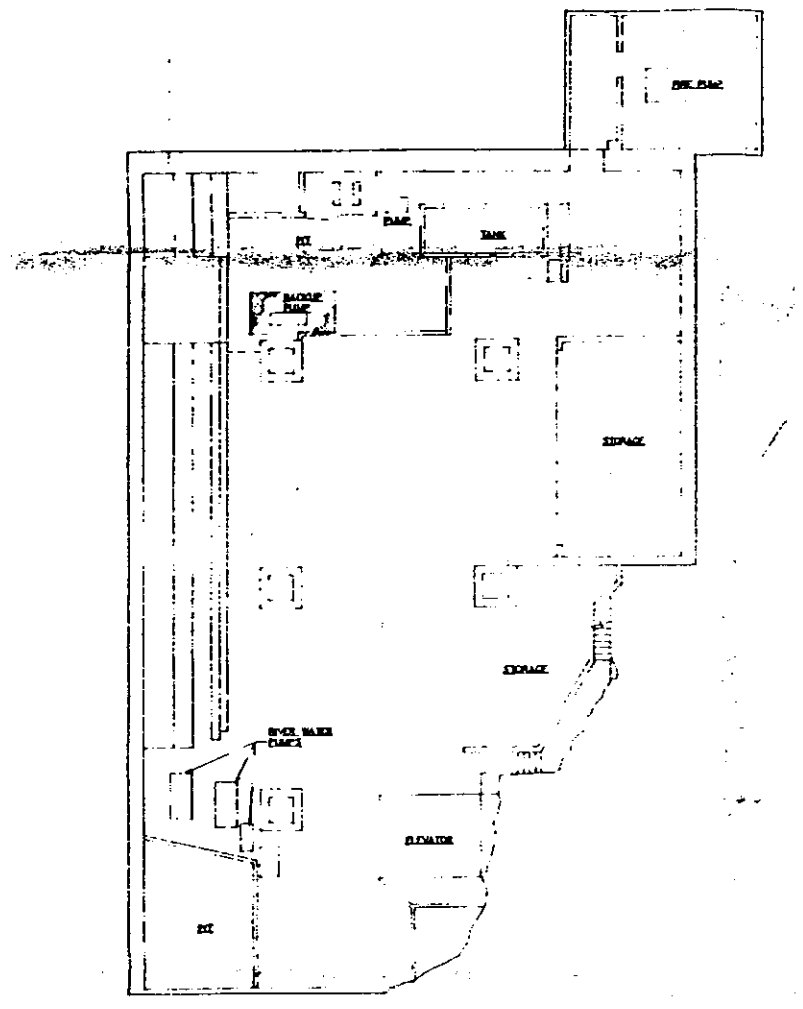
Note: The original drawing were provided by Rexam DSI and were modified only for the purpose of this report as a reference tool. The drawing is NOT TO SCALE.





Note: The original drawing were provided by Rexam DSI and were modified only for the purpose of this report as a reference tool. The drawing is NOT TO SCALE.

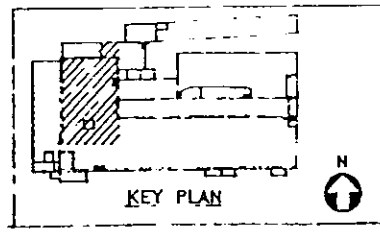




4TH FLOOR PLAN

N

Note: The original drawing were provided by Rexam DSI and were modified only for the purpose of this report as a reference tool. The drawing is NOT TO SCALE.



KEY PLAN

N

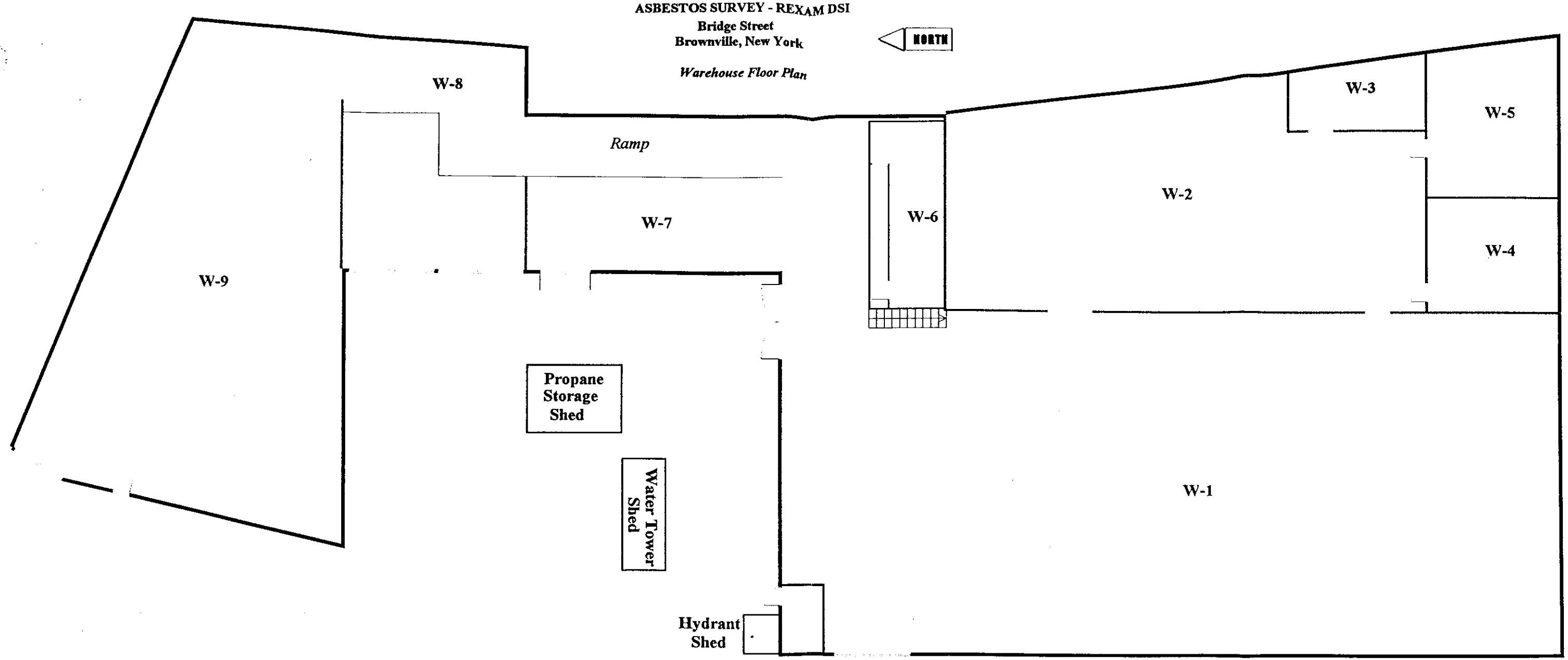
REXAM DSI
BRIDGE ST. BROWNVILLE, N.Y. 13615
PROJECT:
REXAM DSI RENOVATIONS
DRAWING:
4TH FLOOR PLAN

M-4

ASBESTOS SURVEY - REXAM DSI
Bridge Street
Brownville, New York

Warehouse Floor Plan

NORTH



ASBESTOS

1) HAS A SURVEY BEEN DONE TO IDENTIFY ALL ASBESTOS CONTAINING MATERIALS LOCATIONS? Yes

2) DOES THE MILL HAVE ASBESTOS? Yes

IF YES, PLEASE ANSWER THE FOLLOWING:

3) MILL CONTACT: Joe Litsermeyer

4) IS THERE A WRITTEN ASBESTOS MANAGEMENT PLAN INCLUDING: No

a) LOCATION OF ASBESTOS CONTAINING MATERIALS?
b) ABATEMENT GOALS?
c) ABATEMENT PRIORITIES?
d) INDIVIDUAL RESPONSIBILITIES?
e) PROCEDURES FOR ROUTINE REMOVAL WORK?
f) PROCEDURES FOR EMERGENCY REMOVAL WORK?
g) DISPOSAL PROCEDURES?

5) IS THE MILL'S GOAL TO BECOME ASBESTOS FREE? Yes WHEN? ???

IF NOT, SUMMARIZE GOAL

6) DO PLANT EMPLOYEES PERFORM ANY ASBESTOS WORK? No

IF SO, DOES THE WRITTEN PLAN COVER:

a) ANNUAL EMPLOYEE TRAINING?
b) RESPIRATORY PROTECTION?
c) ANNUAL MEDICAL MONITORING?
d) AIR SAMPLING?
e) EPA/STATE NOTIFICATION PROCEDURES?
f) LIMITS TO SIZE OR SCOPE OF WORK?

7) ARE CONTRACTORS USED FOR ASBESTOS WORK? Yes

FIRM 1: Allwash CONTACT: PHONE:

8) WHO IS AVAILABLE FOR EMERGENCY WORK ON A 24 HOUR BASIS? Allwash

9) WHERE IS ASBESTOS DISPOSED OF? Tricil Landfill

IS THE LANDFILL LICENSED? Yes LICENSE # 23508-1351 EXPIRES ??

10) ARE ASBESTOS ABATEMENT REPORTS SENT TO EPA Yes AND THE STATE Yes PRIOR TO DOING EACH JOB?

COMMENTS: The asbestos at the mill is encapsulated. The majority of the asbestos is on decommissioned boilers. Other areas with asbestos are the "old crypt" unused asbestos and potentially small amounts

near the existing boilers. There may be some minor amounts on some insulated piping.

COMPLIANCE STATUS:

FOLLOW UP REQUIRED: Label area near the decommisioned boilers that there is asbestos in the area. Need a written plan for the asbestos in the boiler house area. Consider removing the approximately 300 feet of asbestos covered pipe in the warehouse and crypt.

APPENDIX 52

Radioactive Source Information

STATE OF NEW YORK
DEPARTMENT OF LABOR
DIVISION OF SAFETY AND HEALTH
Radiological Health Unit
Building #12, Room 169
State Office Building Campus
Albany, NY 12240

December 3, 1999

Steven M. Lange,
Radiation Safety Officer
Rexam DSI
Bridge Street
Brownville, New York 13615

RE: State of New York Department of Labor Radioactive Materials License No. 2911-4145 Inspection on November 1, 1999

Dear Mr. Lange:

This letter refers to the inspection conducted by this writer of activities authorized under your license and to the discussion of findings held with you at the conclusion of the inspection.

The inspection was an examination of activities conducted under your license as they relate to radiation safety and to compliance with the requirements of 12 NYCRR Part 38, "Ionizing Radiation Protection," and to the conditions of your license. The inspection consisted of selective examinations of procedures and representative records, interviews with personnel and measurements and observations by this writer.

During this inspection, no items of noncompliance were found.

I wish to thank you for your assistance and cooperation during this review of your Radiation Safety Program. Please let me know if I can be of further assistance to you.

Sincerely,

Charles J. Burns

Charles J. Burns
Associate Radiophysicist

cc: Norman K. Tominson,
Resident Manager

CJB:wp

STATE OF NEW YORK
DEPARTMENT OF LABOR
DIVISION OF SAFETY AND HEALTH
Radiological Health Unit
Building #12, Room 169
State Office Building Campus
Albany, NY 12240

October 15, 1999

Steven M. Lange, RSO
Rexam DSI
Bridge Street
Brownville, NY 13615

License No. 2911-4145
Reference No. 1
Amendment No. -
DL No. 99-333

Dear Mr. Lange:

Enclosed please find New York State Department of Labor Radioactive Materials License No. 2911-4145, which is designed to give your company complete flexibility in acquiring radioactive gauges for on-site use. The license does not authorize acquisition or use of portable devices to be used off-site.

The license does not list individual sources or gauges that you are authorized to have. Instead, it allows you to acquire any gauge authorized for distribution to "specific" or "general" licensees. You need not request an amendment or authorization from this office before ordering, receiving or disposing any gauge. However, you must keep your inventory updated, so that you will always have an accurate list identifying each gauge and its location, but you no longer need to "register" generally licensed gauges.

* A new requirement is that you submit a current, accurate inventory to this office every January.

As you can see, we are making control and accountability over radioactive sources the focus of the license. Please review the license conditions, which are all directed at this goal, and call us if you have any questions. These requirements should also be included in training given to persons who have responsibilities under the license.

Also enclosed are some self-sticking labels, which we are encouraging licensees to use on devices which have been taken out of service. They are intended to help prevent improper disposal, although obsolete devices should be disposed of as soon as possible; and storage of unused gauges prior to disposal should be minimized.

Sincerely,

Charles J. Burns

Charles J. Burns
Associate Radiophysicist

CJB:dfp
enclosure

cc: Norman K. Tomlinson, Resident Manager

STATE OF NEW YORK - DEPARTMENT OF LABOR
DIVISION OF SAFETY AND HEALTH

RADIOACTIVE MATERIALS LICENSE

L 99-333

PURSUANT TO THE LABOR LAW AND INDUSTRIAL CODE RULE 38, AND IN RELIANCE ON STATEMENTS AND REPRESENTATIONS HERETOFORE MADE BY THE LICENSEE DESIGNATED BELOW. A LICENSE IS HEREBY ISSUED AUTHORIZING SUCH LICENSEE TO RECEIVE, POSSESS, USE AND TRANSFER RADIOACTIVE MATERIAL(S) DESIGNATED BELOW; AND TO USE SUCH RADIOACTIVE MATERIAL(S) FOR THE PURPOSE(S) AND AT THE PLACE(S) DESIGNATED BELOW. THIS LICENSE IS SUBJECT TO ALL APPLICABLE RULES, REGULATIONS, AND ORDERS NOW OR HEREAFTER IN EFFECT OF ALL APPROPRIATE REGULATORY AGENCIES AND TO ANY CONDITIONS SPECIFIED BELOW.

1. NAME OF LICENSEE	3. LICENSE NUMBER
Rexam DSI FEIN:11-2050540 PHONE:(315)782-5800	2911-4145
	4. EXPIRATION DATE: September 30, 2002
2. ADDRESS OF LICENSEE Bridge Street Brownville, New York 13615	5a. REFERENCE No. 1 — b. AMENDMENT No. -

6. RADIOACTIVE MATERIALS (element in mass number)	7. CHEMICAL AND/OR PHYSICAL FORM	8. MAXIMUM QUANTITY LICENSEE MAY POSSESS AT ANY ONE TIME
A. Any	A. Sealed Sources (See Condition 9.A.)	A. See Condition 9.B.

9. Authorized use:

A. The licensee is authorized to acquire and use any sealed source contained in a measuring, gauging or controlling device (gauge), which is authorized for distribution to specific or general licensees in a license issued by an Agreement State, a licensing State or the U.S. Nuclear Regulatory Commission. Combinations of sources and devices shall be compatible for use as stated in a Sealed Source and Device Registration Certificate, and devices shall only be used for the purposes specified in the Registration Certificate.

B. No source may exceed the maximum activity specified for that nuclide in the Sealed Source and Device Registration Certificate for any device in which the source is to be used.

10. Licensed material shall only be used at licensee Installation specified in Condition 2. of this License.

11. Licensed material shall be used by, or under the supervision of, Steven M. Lange (Radiation Safety Officer).If this person leaves your employ, or discontinues responsibility for overseeing your radiation protection program you must contact the Department within thirty days and designate a new Radiation Safety Officer.

12. Each device must be labeled in accordance with the provisions of a U.S. NRC or Agreement State license which authorizes the distribution of the devices. These labels must be maintained in legible condition and replaced as necessary.

3. License Number 2911-4145 5a. Ref. No. 1 b. Amend. No. -

13. Each device must be installed on the premises of the licensee by a person authorized to install such devices under a license or permit issued to the installer by the U.S. NRC, or any Agreement State, if a label affixed to the device at the time of receipt states that such installation is required. This requirement does not apply while devices are held in storage in the original shipping containers pending installation.

14. All radioactive sources must be obtained from a vendor who will give you a commitment to accept all sources back when you no longer need them.

15. The licensee shall not dispose of any such device except by transfer to a person who holds a license or permit issued by the U.S. NRC or an Agreement State to receive it. In case the device is to remain in use at a particular location under new ownership, the licensee shall first contact the Department.

16. A. The licensee shall assure that all labels affixed to the devices bearing the statement "Removal of This Label is Prohibited" are maintained on the devices, and shall comply with all instructions contained in such labels and with all other instructions supplied by the manufacturer or distributor.

B. The licensee shall not alter a device in any way, remove the source or source holder from the device, nor alter the device shielding in any way.

17. The licensee shall cause the device to be tested for leakage of radioactive material at the time of installation of the device or replacement of the radioactive material, and thereafter at intervals that do not exceed six months, or at such longer intervals, not to exceed three years, as specified by the appropriate licensing agency and indicated in the required label; except that any such device containing only Krypton 85 need not be tested for leakage, and devices containing only Hydrogen 3 need not be so tested for any purpose.

18. The licensee shall cause each device to be tested for proper operation of the on-off mechanism and indicator, if any, at the time of installation, after replacement of the radioactive material, and after any repair or servicing of the device.

19. A. The licensee shall conduct, or have conducted, a periodic inventory of all devices possessed under this license. Such inventory shall be conducted at intervals not to exceed six months and shall be documented in a record containing the identity of each device (make, model and serial number), the radionuclide and activity in the source, its location, whether it is in active use, date of last leak test of the device, and the identity of the person who performed the inventory.

B. On an annual basis, between January 1, and January 31 of each year, the licensee shall submit an accurate inventory of all devices to the Department. Any discrepancies between one year's inventory and the next, must be accounted for by supplying documentation of legal disposal of any deleted devices.

STATE OF NEW YORK - DEPARTMENT OF LABOR
DIVISION OF SAFETY AND HEALTH

RADIOACTIVE MATERIALS LICENSE

3. License Number 2911-4145 5a. Ref. No. 1 b. Amend. No. -

20. The licensee shall cause each required test and all other servicing involving such radioactive material, its shielding or containment, to be conducted as specified in the instructions provided by the device labels (or otherwise provided by the supplier), or by a person who holds a license which authorizes him/her to manufacture, install or service the device.

21. Upon any indication of a possible failure of, or damage to the shielding or containment of the radioactive source, or an on-off mechanism or indicator, the licensee shall immediately notify the Department by telephone and shall suspend use of such device.

22. The licensee shall report immediately by telephone, the loss of control of any radioactive source or device. This includes inability to locate a source or device on your premises, or failure of a source or device to arrive at a destination to which you have shipped it, at the expected time.

23. Sources in devices which are no longer useful to the licensee shall be promptly transferred to a licensed recipient for use, recycling or disposal.

24. This license does not authorize licensee installation, removal or reinstallation of devices, except as provided for in the Sealed Source & Device Registry Sheet for each gauge.

James J. McGowan
Commissioner of Labor

DATE: 10/15/99
CJB:dfp

by: Clayton J. Bradt, CHP
Associate Radiophysicist

NDC Gauge Inventory

DEVICES

Manufacturer	Serial #	Model	Isotope	Strength	Location	Usage	Last Inventory	Next Inventory	Last WipeTest	Results	NextWipeTest	Inspector
Amersham	3647	AMCP6	Am-241	5.55 GBq /150 mCi	Coater 1stScanner	Active	29-Feb-00	Aug-00	20-Mar-98	<4.0Bq/<0.0001 microcurie	Mar-01	S.M.Lange
Amersham	3648	AMCP6	Am-241	5.55 GBq /150 mCi	Coater 2nd Scanner	Active	29-Feb-00	Aug-00	20-Mar-98	<4.0Bq/<0.0001 microcurie	Mar-01	S.M.Lange
Amersham	3649	AMCP6	Am-241	5.55 GBq /150 mCi	Coater 3rd Scanner	Active	29-Feb-00	Aug-00	20-Mar-98	<4.0Bq/<0.0001 microcurie	Mar-01	S.M.Lange
Amersham	3905	AMCP6	Am-241	5.55 GBq /150 mCi	RampRoom 2ndFloor	Storage	29-Feb-00	Aug-00	20-Mar-98	<4.0Bq/<0.0001 microcurie	Mar-01	S.M.Lange

Steven M Lange
29 Feb 00

NDC SYSTEMS

Infrared Engineering

LEAK TEST CERTIFICATE

Owner: REXAM DSI

Address: Brownville, NY

Model/Serial Number: 103 S/N 3905

Source Number: 1444.LQ

Manufacturer: AMERSHAM

Isotope: Am-241

Strength: 5.55 GBq / 150 mCi

Model Number: AMCP6

Date Wiped: 20 Mar 98

Results*: <4.0 Bq / <.0001 microcuries

Shutter Check: Performed

Dated: 20 Mar 98

Approved By:

Chris Fitz
Radiation Safety Officer

REISSUED 8/13/99

*< 185 becquerels / < .005 microcuries indicates non-leaking source

NDC SYSTEMS

Infrared Engineering

LEAK TEST CERTIFICATE

Owner: REXAM DSI

Address: Brownville, NY

Model/Serial Number: 103 S/N 3647

Source Number 0239 LQ

Manufacturer AMERSHAM

Isotope Am-241

Strength 5.55 GBq / 150 mCi

Model Number AMCP6

Date Wiped 20 Mar 98

Results* <4.0 Bq / <.0001 microcuries

Shutter Check Performed

Dated:

20 Mar 98

Approved By:

Chris Fitz
Radiation Safety Officer

REISSUED 8/13/99

*< 185 becquerels / < .005 microcuries indicates non-leaking source

NDC SYSTEMS

Infrared Engineering

LEAK TEST CERTIFICATE

Owner: REXAM DSI

Address: Brownville, NY

Model/Serial Number: 103 S/N 3648

Source Number 0637 LQ

Manufacturer AMERSHAM

Isotope Am-241

Strength 5.55 GBq / 150 mCi

Model Number AMCP6

Date Wiped 20 Mar 98

Results* <4.0 Bq / <.0001 microcuries

Shutter Check Performed

Dated: 20 Mar 98

Approved By:

Chris Fitz
Radiation Safety Officer

REISSUED 8/13/99

*< 185 becquerels / < .005 microcuries indicates non-leaking source

NDC SYSTEMS

Infrared Engineering

LEAK TEST CERTIFICATE

Owner: REXAM DSI

Address: Brownville, NY

Model/Serial Number: 103 S/N 3649

Source Number 0641 LQ

Manufacturer AMERSHAM

Isotope Am-241

Strength 5.55 GBq / 150 mCi

Model Number AMCP6

Date Wiped 20 Mar 98

Results* <4.0 Bq / <.0001 microcuries

Shutter Check Performed

Dated:

20 Mar 98

Approved By:

Chris Fitz
Radiation Safety Officer

REISSUED 8/13/99

*< 185 becquerels / < .005 microcuries indicates non-leaking source

Honeywell
measurex

14-Dec-99

To: Steve Lang
Rexam DSI
Specialties, Inc.
Bridge Street
Brownville NY 13615

From: Lynell Lyon

Re: Results of Radiation Safety Tests of Sensors at Site Number 4156

Honeywell-Measurex (HMX) system no.	Model	Source s/n	Source
4156	2201	0187BXV	Kr-85
4156	2201	0188BXV	Kr-85

Test performed by: W. Cousins Employee Number: 10612
Date of test: 2-Dec-99

The radiation warning lights and/or indicators, shutter (on-off) mechanism, and applicable radiation safety interlocks were tested and found to be functioning correctly on the date of this test.

This test was performed in accordance with the provisions of HMX Specific License Number 1663, issued by the State of California. This notice should be kept in site records and be available for review by radiation regulatory authorities.

Contact the HMX representative or the HMX Radiation Safety Office for additional information regarding this test.

Lynell Lyon
Assistant Radiation Safety Officer

CC: W. LaForest
W. Cousins
Art Hilts

(r:\db2\nylet, r)

APPENDIX 53

Documentation of Correspondence to and Replies from State and Federal Agencies

New York State Department of Environmental Conservation
Regional Administration, Region 6
Dulles State Office Building, 317 Washington Street, Watertown, New York 13601-3787
Phone: (315) 785-2253 • **FAX:** (315) 785-2242
Website: www.dec.state.ny.us

John P. Cahill
Commissioner

June 29, 2000

Mr. Mark P. Roman, President
Envision Environmental, Inc.
21 Priscilla Lane
Howell, NJ 07731

RE: FOIL Request #72 - Rexam DSI Inc., Lowville, NY
FOIL Request #73 - Rexam DSI Inc., Brownville, NY

Dear Mr. Roman:

The records you have requested to review, in regard to the above captioned FOIL request, are available for review in my office.

Please call me at 315-785-2253 to schedule an appointment to view these records.

Sincerely,

John Moesel
Administrative Assistant
Region 6

JM/as

New York State Department of Environmental Conservation
Regional Administration, Region 6
Dulles State Office Building, 317 Washington Street, Watertown, New York 13601-3787
Phone: (315) 785-2253 • **FAX:** (315) 785-2242
Website: www.dec.state.ny.us

Environmental Conservation 30 YEARS
John P. Cahill
Commissioner

September 20, 2000

Mr. Abraham Platt
175 Misty Lane
Middlesex, NJ 08846

RE: FOIL Request #72 - Rexam DSI Inc., Lowville, NY
FOIL Request #73 - Rexam DSI Inc., Brownville, NY

Dear Mr. Roman:

Enclosed please find the requested documents in regard to the above captioned matters.

Sincerely,

John Moesel
Administrative Assistant
Region 6

JM/as
Enclosures

NEW YORK STATE CENSUS 2000
BE PART OF THE COUNT

Main Office
21 Priscilla Lane
Howell, New Jersey 07731
(732) 886-1664
(732) 886-2925 fax

Abraham Platt
175 Misty Lane
Middlesex, New Jersey 08846
Tel / Fax : (732) 752-6341
Cell Phone: (732) 433-5619

ENVISION ENVIRONMENTAL, INC.

Fax

To:	Helen	**From:**	Abraham Platt
Company:	NYSDEC	**Location:**	Albany, NY
Fax:	(518) 474-4597	**Pages:**	5
Phone:	(518) 486-9846	**Date:**	09/14/00
Re:	FOIL Request	**CC:**	

☐ **Urgent** ☐ **For Review** ☐ **Please Comment** ☑ **Please Reply** ☐ **Please Recycle**

• **Comments:**

Helen:

Per our recent telephone conversation, please respond to the attached letters.

Thank You

Abraham Platt

ENVISION ENVIRONMENTAL, INC.

April 26, 2000

New York Emergency Response Commission
Public Security Bldg., State Campus
Albany, NY 12226-5000

RE: Rexam DSI Inc.
Bridge Street
Brownville, NY 13615

Dear Department:

ENVISION ENVIRONMENTAL, INC. (ENVISION) is in the process of conducting an ASTM Phase I Environmental Site Assessment (Phase I ESA) of the referenced property. As you are aware, a very important part of a Phase I ESA is to request and review state and local environmental records of the subject site and its adjoining properties. ENVISION would appreciate your cooperation in assisting us in determining if the subject site has been adversely impacted by any spills or discharges of hazardous materials by the present or past operators of the subject site, by adjoining properties, or other potential offsite sources that you may be aware of.

The following lists some of the information of interest regarding the referenced site:

- Underground storage tanks (active, leaking, and removed);
- Site remediation activities for spills or UST removals;
- Hazardous waste generators listings (RCRA);
- Community Right-to-Know information (SARA);
- State permits relating to water, wastewater, air, etc. or other permits under the Clean Air Act or the National Pollutant Discharge Elimination System programs;
- Water quality (drinking water and groundwater) reports and existence of any wells for the subject site and the surrounding area;
- Records of any asbestos materials onsite;
- Radon testing (local area or onsite);
- Records of PCB-containing materials onsite;
- Existence of any wetlands either onsite or locally;

21 Priscilla Lane, Howell, NJ 07731 • Phone: 732-886-1664 Fax: 732-886-2925

ENVISION
ENVIRONMENTAL, INC.

- Information pertaining to material dumping and/or landfilling onsite or on adjacent properties;
- Information pertaining to septic systems (either onsite or adjacent) and discharges to publicly owned treatment works;
- Any records of spills or other incidents that may have an environmental impact on a site;
- Environmental records pertaining to property transactions;
- Department inspection/compliance records;
- Records of environmental citations or violations;
- Records of community or employee complaints relating to environmental issues (odor, noise, etc.);
- Reports of any environmental investigations including air, water and soil sampling;
- Conditions of general concern either onsite or locally (i.e. flood hazards, other contaminated sites, etc.); and
- Any other information that may assist us in determining if the subject site has been adversely impacted by any spills or discharges of hazardous materials by the present or past operators of the subject site, by adjoining properties, or other potential offsite sources.

ENVISION would like to receive copies of the information pertaining to the above. We would be pleased to reimburse you for any costs associated with providing us this information.

Time is of the essence in this matter. Please contact the undersigned with any questions that you may have.

Sincerely,

Mark P. Roman, CHMM
President

ENVISION ENVIRONMENTAL, INC.

April 26, 2000

Division of Coastal Resources and Waterfront Revitalization
Department of State
162 Washington St.
Albany, NY 12231-0001

RE: Rexam DSI Inc.
Bridge Street
Brownville, NY 13615

Dear Department:

ENVISION ENVIRONMENTAL, INC. (ENVISION) is in the process of conducting an ASTM Phase I Environmental Site Assessment (Phase I ESA) of the referenced property. As you are aware, a very important part of a Phase I ESA is to request and review state and local environmental records of the subject site and its adjoining properties. ENVISION would appreciate your cooperation in assisting us in determining if the subject site has been adversely impacted by any spills or discharges of hazardous materials by the present or past operators of the subject site, by adjoining properties, or other potential offsite sources that you may be aware of.

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21 Priscilla Lane, Howell, NJ 07731 • Phone: 732-886-1664 Fax: 732-886-2925

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Sincerely,

Mark P. Roman, CHMM
President

TRANSMISSION VERIFICATION REPORT

TIME : 09/14/2000 16:14

DATE,TIME	09/14 16:12
FAX NO./NAME	15184744597
DURATION	00:02:09
PAGE(S)	05
RESULT	OK
MODE	STANDARD ECM

ENVISION ENVIRONMENTAL, INC.

April 26, 2000

USEPA
Region II
26 Federal Plaza
New York, NY 10278

RE: Rexam DSI Inc.
Bridge Street
Brownville, NY 13615

Dear Department:

ENVISION ENVIRONMENTAL, INC. (ENVISION) is in the process of conducting an ASTM Phase I Environmental Site Assessment (Phase I ESA) of the referenced property. As you are aware, a very important part of a Phase I ESA is to request and review state and local environmental records of the subject site and its adjoining properties. ENVISION would appreciate your cooperation in assisting us in determining if the subject site has been adversely impacted by any spills or discharges of hazardous materials by the present or past operators of the subject site, by adjoining properties, or other potential offsite sources that you may be aware of.

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21 Priscilla Lane, Howell, NJ 07731 • Phone: 732-886-1664 Fax: 732-886-2925

ENVISION
ENVIRONMENTAL, INC.

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Sincerely,

Mark P. Roman, CHMM
President

ENVISION ENVIRONMENTAL, INC.

April 26, 2000

U.S. Army Corps of Engineers
North Atlantic Division
26 Federal Plaza
New York, NY 10278-0090

RE: Rexam DSI Inc.
Bridge Street
Brownville, NY 13615

Dear Department:

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21 Priscilla Lane, Howell, NJ 07731 • Phone: 732-886-1664 Fax: 732-886-2925

ENVISION
ENVIRONMENTAL, INC.

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Sincerely,

Mark P. Roman, CHMM
President

ENVISION ENVIRONMENTAL, INC.

April 26, 2000

New York State Department of Environmental Conservation
50 Wolf Road
Albany, NY 12233-1016

RE: Rexam DSI Inc.
Bridge Street
Brownville, NY 13615

Dear Department:

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21 Priscilla Lane, Howell, NJ 07731 • Phone: 732-886-1664 Fax: 732-886-2925

ENVISION
ENVIRONMENTAL, INC.

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Time is of the essence in this matter. Please contact the undersigned with any questions that you may have.

Sincerely,

Mark P. Roman, CHMM
President

'ew York State Department of Environmental Conservation
.egional Administration, Region 6
Dulles State Office Building, 317 Washington Street, Watertown, New York 13601-3787
Phone: (315) 785-2253 • **FAX:** (315) 785-2242
Website: www.dec.state.ny.us

John P. Cahill
Commissioner

May 2, 2000

Mr. Mark P. Roman, President
Envision Environmental, Inc.
21 Priscilla Lane
Howell, NJ 07731

RE: FOIL Request #72 - Rexam DSI Inc., Lowville, NY
FOIL Request #73 - Rexam DSI Inc., Brownville, NY

Dear Mr. Roman:

This is to acknowledge receipt of your Freedom of Information requests in regard to the above-captioned matters.

Due to the volume requested, the compilation of these records is expected to be a lengthy process.

I will check with the appropriate program people who handle this subject and inform you of our findings as quickly as possible.

Sincerely,

John Moesel
Administrative Assistant
Region 6

JM/as

New York State Department of Environmental Conservation
Office of External Affairs - Room 602
Wolf Road, Albany, New York 12233-1016
3) 457-5400 (518) 457-7735 (fax)

John P. Cahill
Commissioner

FOIL Request No. **00-395**

5/8/00

Mr. Mark P Roman
Envision Environmental, Inc.
21 Priscilla Lane
Howell, NJ 07731-

Dear Mr. Roman:

This is to acknowledge receipt of your Freedom of Information Law request seeking:

Records re: **Rexam DIS, Inc., Bridge Street, Brownville**

I have referred your request to the following Records Custodian (s) / Freedom of Information Law Coordinator (s) who may possess the records you are requesting:

Mr. John Moesel - Region 6
State Office Building
Watertown, NY 13601-3787 315-785-2253

You may expect a response to your request by 5/22/00.

If I can be of further assistance, please contact me at (518) 457-5400 Refer to request number **00-395** if you write or call.

Sincerely,

Ruth L. Earl
Records Access Officer

ENVISION ENVIRONMENTAL, INC.

June 4, 2000

New York State Department of Environmental Conservation
Utica State Office Building
207 Genesee Street
Utica, NY 13501-2885

RE: FOIL Request No. 73
REXAM DSI INC.
Brownville, NY

Dear Department:

As requested in your May 25, 2000 letter (see attached), enclosed please find a $7.50 check for copies of your records pertaining to the above referenced request. Please forward the copies to my attention to the address identified below.

Should you have any questions, please feel free to contact me at any time.

Very truly yours,

Mark P. Roman, CHMM
President

21 Priscilla Lane, Howell, NJ 07731 • Phone: 732-886-1664 Fax: 732-886-2925

New York State Department of Environmental Conservation
Division of Legal Affairs, Region 6
Utica State Office Building, 207 Genesee Street, Utica, New York 13501-2885
Phone: (315) 793-2554 • **FAX:** (315) 793-2748
Website: www.dec.state.ny.us

John P. Cahill
Commissioner

May 25, 2000

Mr. Mark P. Roman, President
Envision Environmental, Inc.
21 Priscilla Lane
Howell, New Jersey 07731

Re: **FOIL Request No. 73,**
Rexam DSI, Inc., Brownville

Dear Ms. Roman:

The cost of reproducing the records in the above-referenced request is $7.50. Upon receipt of a check in that amount made payable to NYSDEC, the requested information will be forwarded to you. Please send your check to my attention at the following address:

New York State Department of Environmental Conservation
Utica State Office Building
207 Genesee Street
Utica, New York 13501-2885

Alternatively, the records are available for review, upon appointment, in the Utica sub-office. Please call Mrs. Judy Mariotti at (315) 793-2554 if you wish to schedule an appointment.

Sincerely,

Randall C. Young
Assistant Regional Attorney
Region 6

cc: John Moesel
RCY:m

ENVISION ENVIRONMENTAL, INC.
(732) 886-1664
21 PRISCILLA LANE
HOWELL, NJ 07731

FLEET BANK
HOWELL, NJ 07731
55-33/212

2487

DATE: Jun 3, 2000

AMOUNT: **********$7.50

PAY
Seven and 50/100 Dollars

TO THE ORDER OF: NYSDEC

AUTHORIZED SIGNATURE

SECURITY FEATURES INCLUDED. DETAILS ON BACK.

⑈002487⑈ ⑆021200339⑆ 2017 21 8010⑈

New York State Department of Environmental Conservation
Division of Legal Affairs, Region 6
Utica State Office Building, 207 Genesee Street, Utica, New York 13501-2885
Phone: (315) 793-2554 • **FAX:** (315) 793-2748
Website: www.dec.state.ny.us

Environmental Conservation 30 YEARS
John P. Cahill
Commissioner

June 7, 2000

Mr. Mark P. Roman, President
Envision Environmental, Inc.
21 Priscilla Lane
Howell, New Jersey 07731

Re: **FOIL Request No. 73,**
Rexam DSI, Inc., Brownville

Dear Mr. Roman:

This is to acknowledge receipt of check # 2487 in the amount of $7.50 for the cost of reproducing the records requested in the above-referenced matter. The requested documents, and the Department's standard receipt, are enclosed.

Sincerely,

Randall C. Young

Randall C. Young
Assistant Regional Attorney
Region 6

Enclosures
cc: John Moesel
RCY:m

NEW YORK STATE CENSUS 2000
BE PART OF THE COUNT
SEA PARTE DE LA CUENTA!

93-19-1 (8/95

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SPILLS MANAGEMENT • BUREAU OF SOURCE CONTROL

PETROLEUM BULK STORAGE APPLICATION

Pursuant to the Petroleum Bulk Storage Law,
Article 17, Title 10 of ECL; 6 NYCRR 612-614 and 6 NYCRR, Subpart 360-14.
(Continued on Reverse Side—Please Be Sure to Complete Section B)

RETURN COMPLETED FORM & FEE TO:
NYS DEC - REGION 6
STATE OFFICE BUILDING
207 GENESEE STREET
UTICA, NY 13501
(315) 793-2554

Please Type or Print Clearly and Complete All Items

SECTION A—See Instructions on Cover Sheet

PBS NUMBER
6-009520

Indicate Other Existing DEC Numbers, if any, for this Facility:

CBS Number:

SPDES Number:

TRANSACTION TYPE (Check all that apply)
NOTE: Transaction Types 1, 2 and 5 may require a fee.

1. ☐ Initial/ New Facility
2. ☐ Change of Ownership
3. ☐ Substantial Tank Modification
4. ☐ Information Correction
5. ☒ Renewal

Geographical Locator for this Facility: (If known)
LATITUDE: DEG MIN SEC
LONGITUDE: DEG MIN SEC

FACILITY

NAME: REXAM DSI
LOCATION (Not P.O. Boxes): BRIDGE STREET
LOCATION (Continued):
CITY/TOWN/VILLAGE: BROWNVILLE V | STATE: NY | ZIP CODE: 13615
COUNTY: JEFFERSON | TOWNSHIP OR CITY: BROWNVILLE
NAME OF OPERATOR AT FACILITY: REXAM DSI | FACILITY TELEPHONE NUMBER: (315) 782-5800
EMERGENCY CONTACT NAME: STEVE LANGE | EMERGENCY CONTACT PHONE NO.: (315) 782-5800

OWNER

NAME: REXAM DSI
ADDRESS (Street and/or P.O. Box): BRIDGE STREET
CITY: BROWNVILLE | STATE: NY | ZIP CODE: 13615
FEDERAL TAX ID NO.: 04-3115718 | OWNER TELEPHONE NUMBER: (315) 782-5800
TYPE OF OWNER (Check only one)
1 ☐ Private Resident 2 ☐ State Government 3 ☐ Local Government
4 ☐ Federal Government 5 ☒ Corporate/Commercial

MAILING CORRESPONDENCE

ATTENTION: TIM SHEAR
NAME OF COMPANY: REXAM DSI ~~DECORATIVE SPECIALTIES INTERNATIONA~~
ADDRESS: BRIDGE STREET
ADDRESS:
CITY/STATE/ZIP CODE: BROWNVILLE, NY 13615
TELEPHONE NUMBER: (315) 782-5800

TYPE OF PETROLEUM FACILITY:
(Check all that apply)

A. ☐ Storage Terminal/Petroleum Distributor
B. ☐ Retail Gasoline Sales
C. ☐ Other Retail Sales
D. ☒ Manufacturing
E. ☐ Utility
F. ☐ Trucking/Transportation
G. ☐ Apartment Building
H. ☐ School
I. ☐ Farm
J. ☐ Private Residence
K. ☐ Airline (Air Taxi)
L. ☐ Other (Specify)

I hereby certify under penalty of perjury that the information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

NAME OF OWNER OR AUTHORIZED REPRESENTATIVE: KEITH STROHSCHEIN
AMOUNT ENCLOSED: $ 250.00
TITLE: RESIDENT MANAGER
SIGNATURE: [signature] DATE: 6/25/96

OFFICIAL USE ONLY

Page 1 of 1
Date Received: 6/26/96
Date Processed: 8/7/96
Amount Received $ 250.00
Reviewed By: [signature]

PBS NUMBER: 6-009520

Tank Information for Petr m Bulk Storage Facility

EXPIRATION DA 3/15/96

SECTION B—See Instructions on Cover Sheet

Action	Tank Number	Tank Location	Status	Installation or Permanent Closure Date (MO)	(YR)	Capacity (Gallons)	Product Stored	Tank Type	Tank Internal Prot.	Tank External Protection	Piping Location	Piping Type	Piping Internal Prot.	Piping External Protection	Secondary Containment	Leak Detection	Spill/ Overfill Prevention	Dispenser	Last Test Date (underground Tanks) (MO)	(YR)
1	FU2	2	1	01	76	18,500	4	1	0	1	1	1	0	1	1	0	2	2		

KEY FOR SECTION B

ACTION
1 Initial Listing
2 Add Tank
3 Close/Remove Tank
4 Information Correction
5 Recondition/Repair/ Reline Tank

TANK LOCATION
1 Aboveground
2 Aboveground on saddles legs, stilts, rack, or cradle
3 Aboveground: 10% or more below ground
4 Underground
5 Underground, vaulted, with access

STATUS
1 In-service
2 Temporarily out-of-service
3 Closed—Removed
4 Closed—In Place
5 Tank Converted to Non-Regulated Use

PRODUCT STORED
0 Empty
1 Leaded Gasoline
2 Unleaded Gasoline
3 Nos. 1, 2, or 4 Fuel Oil
4 Nos. 5 or 6 Fuel Oil
5 Kerosene
6 Diesel
A Lube Oil
B Used Oil (fuel)
C Used Oil
9 Other*

TANK TYPE
1 Steel/Carbon Steel
2 Stainless Steel Alloy
3 Concrete
4 Fiberglass Coated Steel
5 Fiberglass Reinforced Plastic (FRP)
6 Equivalent Technology
9 Other*

PIPING TYPE
0 None
1 Steel/Iron
2 Galvanized Steel
3 Fiberglass (FRP)
4 Copper
9 Other*

INTERNAL PROTECTION: Tank/Piping
0 None
1 Epoxy Liner
2 Rubber Liner
3 Fiberglass Liner (FRP)
4 Glass Liner
9 Other*

EXTERNAL PROTECTION: Tank/Piping
0 None
1 Painted/Asphalt Coating
2 Sacrificial Anode
3 Impressed Current
4 Fiberglass
5 Jacketed
6 Wrapped (Piping)
9 Other*

PIPING LOCATION
0 None
1 Aboveground
2 Underground
3 Aboveground/Underground Combination

SECONDARY CONTAINMENT
0 None
1 Vault
2 Double-Walled Tank
3 Excavation Liner
4 Cut-off Walls
5 Impervious Underlayment
6 Earthen Dike
7 Prefabricated Steel Dike
8 Concrete Dike
A Synthetic Liner
B Natural Liner
9 Other*

LEAK DETECTION
0 None
1 Interstitial Monitoring
2 Vapor Well
3 Groundwater Well
4 In-tank System
5 Concrete Pad w/channels
6 Double Bottom
9 Other*

SPILL/OVERFILL PREVENTION
0 None
1 Float Vent Valve
2 High Level Alarm
3 Automatic Shut-off
4 Product Level Gauge
5 Catch Basin
6 Vent Whistle
9 Other*

DISPENSER
1 Submersible
2 Suction
3 Gravity

* If Other, please list on separate sheet including the Tank Number

93-06-004 (12/94)—

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

PETROLEUM BULK STORAGE REGISTRATION CERTIFICATE

NYS DEC - REGION 6
STATE OFFICE BUILDING
207 GENESEE STREET
UTICA, NY 13501
(315) 793-2554

TANK NUMBER	DATE INSTALLED	TANK TYPE	CAPACITY (GALLONS)	DATE LAST TESTED	TESTING DUE DATE	
FU2	01/76	Steel/Carbon Steel	18,500			*

OWNER
REXAM DSI
BRIDGE STREET
BROWNVILLE, NY 13615

SITE
REXAM DSI
BRIDGE STREET
BROWNVILLE V, NY 13615

OPERATOR (Name and Telephone Number)
REXAM DSI
(315) 782-5800

EMERGENCY CONTACT (Name and Telephone Number)
STEVE LANGE
(315) 782-5800

* Aboveground tanks require monthly visual inspections and may need documented internal inspections as described in 6NYCRR Pt. 613.

As an authorized representative of the above named facility, I affirm under penalty of perjury that the information displayed on this form is correct to the best of my knowledge. Additionally, I recognize that I am responsible for assuring that this facility is in compliance with all sections of 6 NYCRR Parts 612, 613 and 614, and applicable sections of 6 NYCRR Subpart 360-14 (used oil tanks only), not just those cited below:

- The facility must be re-registered if there is a transfer of ownership.
- The Department must be notified within 30 days prior to adding, replacing, reconditioning, or permanently closing a stationary tank.
- The facility must be operated in accordance with the code for storing petroleum, 6 NYCRR Part 613.
- Any new facility or substantially modified facility must comply with 6 NYCRR Part 614.
- **This certificate must be posted on the premises at all times.** Posting must be at the tank, at the entrance of the facility, or the main office where the storage tanks are located.
- Any person with knowledge of a spill, leak or discharge must report the incident to DEC within two hours (1-800-457-7362).

Signature of Authorized Representative/Owner — Date

Name of Authorized Representative/Owner (Please Print)

Title

ISSUED BY: Commissioner Michael Zagata

PETROLEUM BULK STORAGE ID NUMBER: 6-009520

DATE ISSUED: 08/07/96 | EXPIRATION DATE: 08/15/01

FEE PAID: $ 250

MAILING CORRESPONDENCE

TIM SHEAR
REXAM DSI
BRIDGE STREET
BROWNVILLE, NY 13615

THIS REGISTRATION CERTIFICATE IS NON-TRANSFERABLE

93-06-004 (1/91)—7

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

PETROLEUM BULK STORAGE REGISTRATION CERTIFICATE

NYS DEC - REGION 6
STATE OFFICE BUILDING
207 GENESEE STREET
UTICA, NY 13501
(315) 793-2554

TANK NUMBER	DATE INSTALLED	TANK TYPE	CAPACITY (GALLONS)	DATE LAST TESTED	TESTING DUE DATE	
FU2	01/76	Steel/Carbon Steel	18,500			*1

*1 - Aboveground tanks require monthly visual inspections and documented internal inspections as described in 6 NYCRR Pt. 613.

OWNER
DECORATIVE SPECIALTIES INTERNA
BRIDGE STREET
BROWNVILLE, NY 13615

SITE
DECORATIVE SPECIALTIES INTERNA
BRIDGE STREET
BROWNVILLE, NY 13615

OPERATOR (Name and Telephone Number)
DSI PREMOID DIVISION
(315) 782-5800

EMERGENCY CONTACT (Name and Telephone Number)
NICHOLAS ARVAN
(315) 782-5800

As an authorized representative of the above named facility, I affirm under penalty of perjury that the information displayed on this form is correct to the best of my knowledge. Additionally, I recognize that I am responsible for assuring that this facility is in compliance with all sections of 6 NYCRR Parts 612, 613 and 614, not just those cited below:

- The facility must be re-registered if there is a transfer of ownership.
- The Department must be notified within 30 days prior to adding, replacing, reconditioning, or permanently closing a stationary tank.
- The facility must be operated in accordance with the code for storing petroleum, 6 NYCRR Part 613.
- Any new facility or substantially modified facility must comply with the code for new and substantially modified facilities, 6 NYCRR Part 614.
- **This certificate must be posted on the premises at all times.** Posting must be at the tank, at the entrance of the facility, or the main office where the storage tanks are located.
- Any person with knowledge of a spill, leak or discharge must report the incident to DEC within two hours **(1-800-457-7362).**

Signature of Authorized Representative/Owner — Date

Name of Authorized Representative/Owner (Please Print)

Title

ISSUED BY:
Commissioner Thomas C. Jorling

PETROLEUM BULK STORAGE ID NUMBER
6-009520

DATE ISSUED	EXPIRATION DATE
11/25/92	08/15/96

FEE PAID
$ 250

MAILING CORRESPONDENCE

TIM SHEAR
DECORATIVE SPECIALTIES INTERNA
BRIDGE STREET
BROWNVILLE, NY 13615

THIS REGISTRATION CERTIFICATE IS NON-TRANSFERABLE

93-06-004 (1/91)—

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

PETROLEUM BULK STORAGE REGISTRATION CERTIFICATE

NYS DEC - REGION 6
207 GENESEE STREET
UTICA, NY 13501
(315) 793-2554

TANK NUMBER	DATE INSTALLED	TANK TYPE	CAPACITY (GALLONS)	DATE LAST TESTED	TESTING DUE DATE	
002	01/77	Steel/Carbon Steel	3,000			*1
FU2	01/76	Steel/Carbon Steel	18,500			*1

*1 - Aboveground tanks require monthly visual inspections and documented internal inspections as described in 6 NYCRR Pt. 613.

OWNER
DECORATIVE SPECIALTIES INTERNA
BRIDGE STREET
BROWNVILLE, NY 13615

SITE
DECORATIVE SPECIALTIES INTERNA
BRIDGE STREET
BROWNVILLE, NY 13615

OPERATOR (Name and Telephone Number)
DSI PREMOID DIVISION
(315) 782-5800

EMERGENCY CONTACT (Name and Telephone Number)
NICHOLAS ARVAN
(315) 782-5800

As an authorized representative of the above named facility, I affirm under penalty of perjury that the information displayed on this form is correct to the best of my knowledge. Additionally, I recognize that I am responsible for assuring that this facility is in compliance with all sections of 6 NYCRR Parts 612, 613 and 614, not just those cited below:

- The facility must be re-registered if there is a transfer of ownership.
- The Department must be notified within 30 days prior to adding, replacing, reconditioning, or permanently closing a stationary tank.
- The facility must be operated in accordance with the code for storing petroleum, 6 NYCRR Part 613.
- Any new facility or substantially modified facility must comply with the code for new and substantially modified facilities, 6 NYCRR Part 614.
- **This certificate must be posted on the premises at all times.** Posting must be at the tank, at the entrance of the facility, or the main office where the storage tanks are located.
- Any person with knowledge of a spill, leak or discharge must report the incident to DEC within two hours (1-800-457-7362).

Signature of Authorized Representative/Owner — Date

Name of Authorized Representative/Owner (Please Print)

Title

ISSUED BY:
Commissioner Thomas C. Jorling

PETROLEUM BULK STORAGE ID NUMBER
6-009520

DATE ISSUED	EXPIRATION DATE
08/15/91	08/15/96

FEE PAID
$ 250

MAILING CORRESPONDENCE

NICHOLAS ARVAN
DECORATIVE SPECIALTIES INTERNA
BRIDGE STREET
BROWNVILLE, NY 13615

THIS REGISTRATION CERTIFICATE IS NON-TRANSFERABLE

New York State Department of Environmental Conservation
207 Genesee Street
Utica, New York 13501-2885
(315) 793-2554

Langdon Marsh
Commissioner

October 14, 1994

TIM SHEAR
DECORATIVE SPECIALTIES INTERNATIONAL, INC.
BRIDGE STREET
BROWNVILLE, NY 13615

RE: 6-009520
DECORATIVE SPECIALTIES INTERNATIONAL INC
BROWNVILLE, JEFFERSON COUNTY

Gentlemen:

According to our records, you are the owner of a Petroleum Bulk Storage Facility with at least one aboveground storage tank that has a capacity of ten thousand gallons or more.

As a reminder, the Regulations required secondary containment be installed on all aboveground tanks with a capacity of 10,000 gallons or more by December 27, 1990. Therefore, we will be implementing an inspection program in the near future to confirm compliance.

Enclosed is a brochure titled "Upgrading Existing Facilities" which addresses the secondary containment issue as well as other items which may have been required to be installed at your facility by December 27, 1990.

If you have any questions regarding the regulations or have closed or sold your facility, please contact me at the Utica office at (315) 793-2554.

Sincerely,

Donald I. Johnson

Donald I. Johnson
Environmental Engineer 1
Region 6 - Utica

Enclosure

DIJ:ds

JAMES RIVER CORPORATION
PREMOID DIVISION
Brownville, NY 13615

TELEPHONE (315) 782-5800
FAX (315) 782-5416

ORDER 10294 0

MARK THIS NUMBER ON ALL PACKAGES AND INVOICE

SHIP TO
DECORATIVE SPECIALTIES INT'L
PREMOID DIVISION
BRIDGE STREET
BROWNVILLE, NY 13615

VENDOR
NYS DEC-REGION 6
STATE OFFICE BUILDING
207 GENESEE ST.
UTICA, NEW YORK
13501

BILL TO
DECORATIVE SPECIALTIES INT'L
PREMOID DIVISION
BRIDGE STREET
BROWNVILLE, NY 13615

☑ CONFIRMING ORDER – DO NOT DUPLICATE
ACKNOWLEDGEMENT REQUESTED

QUISITIONER	DELIVER TO	NO DELIVERIES ACCEPTED AFTER 3:00PM DELIVER ONLY TO THIS EXACT ADDRESS
NICK ARVAN		

DER DATE	VENDOR CODE	BUYER	TERMS	SHIP VIA
06/14/91	NYS D	NA	NET 0	

B	FREIGHT	TAXABLE	P.O. TYPE	ACCOUNT NUMBER	CONFIRM TO
DEST	NO CHRGE	NO	EXP	751-999999-9999	DAVE PICKETT

M	PART NUMBER/DESCRIPTION	REV	INSP	DELIVERY DATE	QUANTITY	UOM	UNIT PRICE	EXTENSION	TAX
1	MISC- 1-10294 PERMIT TRANSFER PETROLEUM BULK STORAGE APPLICATION FEE - $250.00 PERMIT TRANSFER FROM - JAMES RIVER CORPORATION TO DECORATIVE SPECIALTIES INTERNATIONAL INC./ PREMOID DIVISION BRIDGE ST. BROWNVILLE, NEW YORK 13615 PERMIT # 147907	E		06/14/91	1.00	01	250.00000	250.000	

PLEASE SHIP THE FOLLOWING MERCHANDISE SUBJECT TO THE CONDITIONS BELOW
RENDER ALL INVOICES IN DUPLICATE.
USE PACKING LIST ON EACH SHIPMENT.
SHIPMENTS PURCHASED "FREIGHT ALLOWED" TRANSPORTATION CHARGES SHOULD BE PREPAID.
GOODS SUBJECT TO OUR INSPECTION ON ARRIVAL, NOTWITHSTANDING PRIOR PAYMENT TO OBTAIN CASH DISCOUNT.
GOODS REJECTED ON ACCOUNT OF INFERIOR QUALITY OR WORKMANSHIP WILL BE RETURNED TO YOU WITH CHARGE FOR TRANSPORTATION, PLUS LABOR, RELOADING, TRUCKING, ETC. AND ARE NOT TO BE REPLACED EXCEPT UPON RECEIPT OF WRITTEN INSTRUCTIONS FROM US.

TOTAL ORDER 250.000

Nicholas W. Aaron
AUTHORIZED SIGNATURE

95-19-5 (2/89)- 10c

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

APPLICATION FOR PERMIT TRANSFER

(In Accordance with Uniform Procedures, Part 621.13)

Please read ALL instructions on back before completing this application. Please TYPE or PRINT clearly in ink.

PART 1—TRANSFEREE (NEW OWNER/OPERATOR/LESSEE) COMPLETES:

LIST PERMIT NUMBER(S) AND THEIR EFFECTIVE AND EXPIRATION DATES.

AIR QUALITY CONTROL PROGRAM ID NUMBER 2226010217
PETROLEUM BULK STROAGE APPLICATION NUMBER 147907

2. NAME OF TRANSFEREE: DECORATIVE SPECIALTIES INTERNATIONAL INC./PREMOID DIV.
TELEPHONE NUMBER: (315) 782-5800

STREET: BRIDGE ST.

CITY: BROWNVILLE, NEW YORK
STATE: N.Y.
ZIP CODE: 13615

3. TRANSFEREE IS A/AN: [X] Owner [ ] Operator [ ] Lessee

4. NAME OF FACILITY/PROJECT: DECORATIVE SPECIALTIES INTERNATIONAL INC./PREMOID DIV.

STREET: BRIDGE ST.

CITY: BROWNVILLE
STATE: N.Y.
ZIP CODE: 13615

COUNTY: JEFFERSON
TOWN: BROWNVILLE

5. HAS WORK BEGUN ON THE PROJECT? EFFECTIVE DATE OF SALE IS 04/29/91
[ ] Yes [X] No If no, proposed starting date: _____ Approximate completion date: _____
If there will be any modifications to the current operation, the transferee must attach a statement specifying the details.

6. CERTIFICATION: This certifies that the transferee is the current owner/operator/lessee of the named facility, has a copy of the permit, understands and will comply with all conditions in the referenced permit. Facility operations/project scope/discharges/emissions will remain the same. Further, I hereby affirm that under penalty of perjury that information provided on this form and all attachments submitted herewith is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

Signature and Title: William J. Jennett V.P GENERAL MANAGER DSI PREMOID DIVISION
Date: 5/14/91

PART 2—TRANSFEROR (FORMER OWNER/OPERATOR/LESSEE) COMPLETES:

1. NAME OF TRANSFEROR: JAMES RIVER CORPORATION
TELEPHONE NUMBER: 804) 649-4209

STREET: Tredegar Street

CITY: Richmond
STATE: VA
ZIP CODE: 23219

2. NAME OF FACILITY/PROJECT, IF DIFFERENT FROM NAME IN PART 1: JAMES RIVER CORPORATION/PREMOID DIVISION

3. CERTIFICATION: This certifies that the facility referenced in Part 1 of this form is/was transferred to the party identified as the new transferee (owner/operator/lessee) on 4/30/91 (date).

Signature and Title: [signature] V.P - [illegible]
Date: [illegible]

PART 3—PERMIT TRANSFER VALIDATION SECTION—DEPARTMENT OF ENVIRONMENTAL CONSERVATION COMPLETES:

[X] Transfer of permit approved. Transferee subject to conditions of permit, without exception.

[ ] Transfer of permit approved, with the following modifications: [ ] See attached revised permit page(s) _____

[ ] New application required. Please complete the enclosed permit application and return it to the undersigned Regional Permit Administrator, Division of Regulatory Affairs, at the appropriate office of the Department (see map on reverse).

Signature: [signature] Regional Permit Administrator
Date: 5/14/91

(4) Fees:

Use the existing fee schedule from Section 612.3(a) of the PBS regulations (reproduced below) to calculate your renewal fee. The fee schedule is on a per facility basis. Add together the capacities of all in-service (active) PBS tanks at the facility to determine the combined storage capacity at the facility. See 6 NYCRR paragraph 612.1(c)(21) for the definition of petroleum.

Combined Storage Capacity At Facility	5-Year Fee
Under 1101 gallons	Registration not required (see note (a) below).
1101 - 4999 gallons	$50 per storage facility
5000 - 10,000 gallons	$150 per storage facility
10,001 - 399,999	$250 per storage facility
400,000 gallons and greater	Registration not required (see note (b) below).

NOTES:

(a) If the aggregate capacity of in-service tanks at the facility is under 1101 gallons, then renewal and fee are not required. Indicate which tanks in Section B have been permanently closed per section 613.9(b) of the PBS regulations. Return completed renewal application form to the DEC Regional Office.

(b) If the aggregate capacity at the facility is 400,000 gallons or more, then renewal and fee are not required. The facility must be licensed under Article 12 of the Navigation Law. If already licensed, return the enclosed PBS renewal form to DEC Regional Office with a note indicating the license number. If not already licensed, return the renewal form to the DEC Regional Office and request a Major Facility License application form.

93-19-1 (12/90)

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF WATER • BUREAU OF SPILL PREVENTION AND RESPONSE

PETROLEUM BULK STORAGE APPLICATION

Pursuant to the Petroleum Bulk Storage Law, Article 17, Title 10 of ECL; and 6 NYCRR 612-614.

Please Type or Print Clearly and Complete All Items

(Continued on Reverse Side—Please Be Sure to Complete Section B)

SECTION A—See Instructions on Cover Sheet

PBS NUMBER 009520

Indicate Other Existing DEC Numbers, If any, for this Facility:

CBS Number: Not applicable

SPDES Number: ~~Not applicable~~

TRANSACTION TYPE (Check all that apply)
NOTE: Transaction Types 1, 2 and 5 require a fee.

1. ☐ Initial/ New Facility
2. ☒ Change of Ownership
3. ☐ Substantial Tank Modification
4. ☐ Information Correction
5. ☐ Renewal

Geographical Locator for this Facility: (If known)

LATITUDE: DEG MIN SEC

LONGITUDE: DEG MIN SEC

FACILITY

NAME: Decorative Specialties International, Inc.

LOCATION (Not P.O. Boxes): Premoid Division
Bridge Street

LOCATION (Continued):

CITY/TOWN/VILLAGE: Brownville | STATE: NY | ZIP CODE: 13615

COUNTY: Jefferson | TOWNSHIP OR CITY: 22601 Brownville

NAME OF OPERATOR AT FACILITY: DSI Premoid Division | FACILITY TELEPHONE NUMBER: (315 782-5800

EMERGENCY CONTACT NAME: Nicholas Arvan | EMERGENCY CONTACT PHONE NO.: (315) 782-5800

OWNER

NAME: Decorative Specialties International, Inc.

ADDRESS (Street and/or P.O. Box): Premoid Division
Bridge Street

CITY: Brownville | STATE: NY | ZIP CODE: 13615

FEDERAL TAX ID NO.: 04-3115718 | OWNER TELEPHONE NUMBER: (315) 782-5800

TYPE OF OWNER (Check only one)
1 ☐ Private Resident 2 ☐ State Government 3 ☐ Local Government
4 ☐ Federal Government 5 ☒ Corporate/Commercial

MAILING CORRESPONDENCE

ATTENTION: ~~Nicholas Arvan~~ Tim Shear as per conversation w/ Tim Shear on 11/23/92 DP

NAME OF COMPANY: Decorative Specialties International, Inc. Premoid Division

ADDRESS: Bridge Street

ADDRESS:

CITY/STATE/ZIP CODE: Brownville, NY 13615

TELEPHONE NUMBER: (315) 782-5800

TYPE OF PETROLEUM FACILITY:
(Check all that apply)

A. ☐ Storage Terminal/Petroleum Distributor
B. ☐ Retail Gasoline Sales
C. ☐ Other Retail Sales
D. ☒ Manufacturing
E. ☐ Utility
F. ☐ Trucking/Transportation
G. ☐ Apartment Building
H. ☐ School
I. ☐ Farm
J. ☐ Private Residence
K. ☐ Airline (Air Taxi)
L. ☐ Other (Specify)

I hereby certify under penalty of perjury that the information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

NAME OF OWNER OR AUTHORIZED REPRESENTATIVE: William S. Linnell | AMOUNT ENCLOSED: $ 250.00

TITLE: Vice President General Manager

SIGNATURE: William S. Linnell | DATE: 5/10/91

OFFICIAL USE ONLY

Page 1 of 1

Date Received: 7/1/91

Date Processed: 8/15/91

Amount Received $ 250.00

Reviewed By:

JAMES RIVER CORPORATION
PREMOID DIVISION
Brownville, NY 13615

TELEPHONE (315) 782-5800
FAX (315) 782-5416

PURCHASE ORDER

PURCHASE ORDER NO. 10294 | CHANGE ORDER NO. 0 | PAGE

MARK THIS NUMBER ON ALL PACKAGES AND INVOICE

SHIP TO
DECORATIVE SPECIALTIES INT'L
PREMOID DIVISION
BRIDGE STREET
BROWNVILLE, NY 13615

VENDOR
NYS DEC-REGION 6
STATE OFFICE BUILDING
207 GENESEE ST.
UTICA, NEW YORK
13501

BILL TO
DECORATIVE SPECIALTIES INT'L
PREMOID DIVISION
BRIDGE STREET
BROWNVILLE, NY 13615

☑ **CONFIRMING ORDER – DO NOT DUPLICATE**
ACKNOWLEDGEMENT REQUESTED

EQUISITIONER	DELIVER TO	
NICK ARVAN		NO DELIVERIES ACCEPTED AFTER 3:00PM DELIVER ONLY TO THIS EXACT ADDRESS

RDER DATE	VENDOR CODE	BUYER	TERMS	SHIP VIA
06/14/91	NYS D	NA	NET 0	

O.B.	FREIGHT	TAXABLE	P.O. TYPE	ACCOUNT NUMBER	CONFIRM TO
DEST	NO CHRGE	NO	EXP	751-999999-9999	DAVE PICKETT

EM	PART NUMBER/DESCRIPTION	REV	INSP	DELIVERY DATE	QUANTITY	UOM	UNIT PRICE	EXTENSION
1	MISC- 1-10294 PERMIT TRANSFER PETROLEUM BULK STORAGE APPLICATION FEE - $250.00 PERMIT TRANSFER FROM - JAMES RIVER CORPORATION TO DECORATIVE SPECIALTIES INTERNATIONAL INC./ PREMOID DIVISION BRIDGE ST. BROWNVILLE, NEW YORK 13615 PERMIT # 147907	E		06/14/91	1.00	01	250.00000	250.000

D. Pickett
Check will follow

PLEASE SHIP THE FOLLOWING MERCHANDISE SUBJECT TO THE CONDITIONS BELOW
RENDER ALL INVOICES IN DUPLICATE.
:CKING LIST ON EACH SHIPMENT.
ENTS PURCHASED "FREIGHT ALLOWED" TRANSPORTATION CHARGES SHOULD BE PREPAID.
GOOds SUBJECT TO OUR INSPECTION ON ARRIVAL, NOTWITHSTANDING PRIOR PAYMENT TO OBTAIN CASH DISCOUNT.
GOODS REJECTED ON ACCOUNT OF INFERIOR QUALITY OR WORKMANSHIP WILL BE RETURNED TO YOU WITH CHARGE FOR TRANSPORTATION, PLUS LABOR, RELOADING, TRUCKING, ETC. AND ARE NOT TO BE REPLACED EXCEPT UPON RECEIPT OF WRITTEN INSTRUCTIONS FROM US.

TOTAL ORDER 250.000

Nicholas W. Arvan
AUTHORIZED SIGNATURE

ORIGINAL

(4) Fees:

Use the existing fee schedule from Section 612.3(a) of the PBS regulations (reproduced below) to calculate your renewal fee. The fee schedule is on a per facility basis. Add together the capacities of all in-service (active) PBS tanks at the facility to determine the combined storage capacity at the facility. See 6 NYCRR paragraph 612.1(c)(21) for the definition of petroleum.

Combined Storage Capacity At Facility	**5-Year Fee**
Under 1101 gallons	Registration not required (see note (a) below).
1101 - 4999 gallons	$50 per storage facility
5000 - 10,000 gallons	$150 per storage facility
10,001 - 399,999	$250 per storage facility
400,000 gallons and greater	Registration not required (see note (b) below).

NOTES:

(a) If the aggregate capacity of in-service tanks at the facility is under 1101 gallons, then renewal and fee are not required. Indicate which tanks in Section B have been permanently closed per section 613.9(b) of the PBS regulations. Return completed renewal application form to the DEC Regional Office.

(b) If the aggregate capacity at the facility is 400,000 gallons or more, then renewal and fee are not required. The facility must be licensed under Article 12 of the Navigation Law. If already licensed, return the enclosed PBS renewal form to DEC Regional Office with a note indicating the license number. If not already licensed, return the renewal form to the DEC Regional Office and request a Major Facility License application form.

95-19-5 (2/89)—10c

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

APPLICATION FOR PERMIT TRANSFER

(In Accordance with Uniform Procedures, Part 621.13)

Please read ALL instructions on back before completing this application. Please TYPE or PRINT clearly in ink.

PART 1—TRANSFEREE (NEW OWNER/OPERATOR/LESSEE) COMPLETES:

1. LIST PERMIT NUMBER(S) AND THEIR EFFECTIVE AND EXPIRATION DATES.
AIR QUALITY CONTROL PROGRAM ID NUMBER 2226010217
PETROLEUM BULK STROAGE APPLICATION NUMBER 147907

2. NAME OF TRANSFEREE: DECORATIVE SPECIALTIES INTERNATIONAL INC./PREMOID DIV.
TELEPHONE NUMBER: (315) 782-5800

STREET: BRIDGE ST,

CITY: BROWNVILLE, NEW YORK
STATE: N.Y.
ZIP CODE: 13615

3. TRANSFEREE IS A/AN: [X] Owner [ ] Operator [ ] Lessee

4. NAME OF FACILITY/PROJECT: DECORATIVE SPECIALTIES INTERNATIONAL INC./PREMOID DIV.

STREET: BRIDGE ST,

CITY: BROWNVILLE
STATE: N.Y.
ZIP CODE: 13615

COUNTY: JEFFERSON
TOWN: BROWNVILLE

5. HAS WORK BEGUN ON THE PROJECT? EFFECTIVE DATE OF SALE IS 04/29/91
[ ] Yes [X] No If no, proposed starting date: _____ Approximate completion date: _____
If there will be any modifications to the current operation, the transferee must attach a statement specifying the details.

6. CERTIFICATION: This certifies that the transferee is the current owner/operator/lessee of the named facility, has a copy of the permit, understands and will comply with all conditions in the referenced permit. Facility operations/project scope/discharges/emissions will remain the same. Further, I hereby affirm that under penalty of perjury that information provided on this form and all attachments submitted herewith is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

Signature and Title William J. Jimmo V.P GENERAL MANAGER JST PREMOID DIVISION Date 5/14/91

PART 2—TRANSFEROR (FORMER OWNER/OPERATOR/LESSEE) COMPLETES:

1. NAME OF TRANSFEROR: JAMES RIVER CORPORATION
TELEPHONE NUMBER: 804) 649-4209

STREET: Tredegar Street

CITY: Richmond
STATE: VA
ZIP CODE: 23219

2. NAME OF FACILITY/PROJECT, IF DIFFERENT FROM NAME IN PART 1:
JAMES RIVER CORPORATION/PREMOID DIVISION

3. CERTIFICATION: This certifies that the facility referenced in Part 1 of this form is/was transferred to the party identified as the new transferee (owner/operator/lessee) on 4/30/91 (date).

Signature and Title [illegible] V.P — [illegible] Date [illegible]

PART 3—PERMIT TRANSFER VALIDATION SECTION—DEPARTMENT OF ENVIRONMENTAL CONSERVATION COMPLETES:

[X] Transfer of permit approved. Transferee subject to conditions of permit, without exception.

[ ] Transfer of permit approved, with the following modifications: [ ] See attached revised permit page(s) _____

[ ] New application required. Please complete the enclosed permit application and return it to the undersigned Regional Permit Administrator, Division of Regulatory Affairs, at the appropriate office of the Department (see map on reverse).

Signature _____ Regional Permit Administrator Date 5/14/91

JAMES RIVER CORPORATION
PREMOID DIVISION
West Springfield, MA 01089 (413) 736-4554

December 22, 1988

Mr. Donald I. Johnson
NY State Department of Environmental Conservation
207 Genessee Street
Utica, NY 13501-2885

Dear Mr. Johnson:

This letter is being sent in response to the three questions you raised in your letter to James River/Premoid on 12/9/88. James River/Premoid worked with Marti Thompson of Allwash of Syracuse to find the answers.

1. Does tank No. FU2 rest directly on the ground or is it on skids or saddles?

   Tank No. FU2 is mounted on saddles above the ground.

2. Was the interior of the tank inspected for corrosion or wear after cleaning?

   Joe Litsermeyer, the James River plant engineer, visually inspected the inside of the tank after it was cleaned. Some corrosion was found on the bottom of the tank. This was reinforced by Norm Welding, Inc. of Limerick, NY with a rolled flat plate which was welded in place.

3. What was the quantity of residue cleaned from the tank, who transported the waste material and where was its final disposal location?

   When Safety Kleen (subcontracted by Allwash) cleaned the tank they generated 300 gallons of oily water. This waste was transported by Safety Kleen to their "oil farm" in Syracuse and transferred to one of their collection tanks. Then a tank truck took this waste from the collection tank in Syracuse to Safety Kleen's facility in Ontario, Canada where it was re-refined.

If you have any further questions, I can be reached at (413) 736-4554 or at the address above.

Sincerely,

Steven K. Snook
Environmental Engineer

SKS/ph
cc: J. J. Litsermeyer

JAMES RIVER CORPORATION
PREMOID DIVISION
West Springfield, MA 01089 (413) 736-4554

December 19, 1988

Mr. Donald I. Johnson
NY State Department of Environmental Conservation
207 Genesee Street
Utica, NY 13501-2885

Dear Mr. Johnson:

Enclosed is the Petroleum Bulk Storage Application with the appropriate signature for James River Corporation/Premoid Division in Brownville, NY. James River/Premoid is presently working with Allwash of Syracuse to answer the 3 question you raised in your letter of 12/9/88, and we shall respond before 12/30/88.

Over the phone you had also inquired about the location of tank number FU1. This tank is in the basement of the mill and is mounted off the ground on saddles. The secondary containment around this tank can hold all the contents of a full tank. The location of this tank was previously reported as "4 Aboveground". Please change the records to indicate "5 Aboveground on crib, etc."

Sincerely,

Steven K. Snook
Environmental Engineer

SKS/ph

cc: J. J. Litsermeyer

207 Genesee Street
Utica, New York 13501-2885

December 9, 1988

Mr. Steven Snook
James River Corporation
Premoid Division
West Springfield, Massachusettes 01089

Re: James River Corp./Premoid Division
Bridge Street
Brownville (V), Jefferson County

Dear Mr. Snook:

I am returning your Petroleum Bulk Storage Application No. 147907 for your signature. Please return the signed application to me by December 23, 1988.

This letter also serves as your notification that James River Corporation is in violation of 6NYCRR 613.9(c), "Reporting of out-of-service tanks". This section requires notification of the Department within thirty (30) days prior to permanent closure of the tank.

Your letter indicated you had Allwash of Syracuse clean the tank and dispose of the sludge in the tank. I have the following comments and/or questions regarding the tank:

1. Does tank no. FU2 rest directly on the ground or is it on skids or saddles?

2. Was the interior of the tank inspected for corrosion or wear after cleaning?

3. What was the quantity of residue cleaned from the tank, who transported the waste material and where was its final disposal location?

A written response to the above noted items should be submitted by December 30, 1988. If you have any questions, I can be reached at (315) 793-2554.

Sincerely,

Donald I. Johnson
Assistant Sanitary Engineer
Region 6 - Utica

Att.
DIJ:emb

JAMES RIVER CORPORATION
PREMOID DIVISION
West Springfield, MA 01089 (413) 736-4554

December 2, 1988

New York State DEC
State Office Building
207 Genesee Street
Utica, NY 13501

Dear Sir/Madam:

Enclosed is a Petroleum Bulk Storage Application for the James River Corporation/Premoid Division paper mill in Brownville, NY. This fall we stopped using our No. 2 fuel oil storage tank number FU2. This tank was cleaned out by Allwash of Syracuse in accordance with 6NYCRR Parts 613.9 (b) and 614.12 (b) (copy of purchase order enclosed). We are now using it for bulk storage of clay slurry, a non hazardous material.

The enclosed application is being sent to comply with 6NYCRR Part 613.9 (c), "Reporting of out-of-service tanks". This tank was originally registered on application number 46854 on 3/11/86. Please remove this tank from any lists of petroleum bulk storage tanks. Thank you.

Sincerely,

Steven K. Snook
Environmental Engineer

SKS/ph
enclosure

JAMES RIVER CORPORATION
PREMOID DIVISION
Brownville, N.Y. 13615

TELEPHONE: 315-782-5800

PURCHASE FILE CLASSIFICATION

FOLLOW UP DATE

PURCHASE ORDER
No. 5192

MARK THIS ORDER NUMBER ON ALL PACKAGES AND INVOICE

ORDER DATE	FOB
10-19-89	
SHIPPING DATE REQUESTED	TERMS
SHIP TO	
ROUTING INSTRUCTIONS	

TO

Allwash of Syracuse
P.O. Box 695
Syracuse, New York
13201

PLEASE SHIP THE FOLLOWING MERCHANDISE SUBJECT TO THE CONDITIONS BELOW
RENDER ALL INVOICES IN DUPLICATE.

INCLUDE PACKING LIST ON EACH SHIPMENT.
ON SHIPMENTS PURCHASED "FREIGHT ALLOWED" TRANSPORTATION CHARGES SHOULD BE PREPAID.
GOODS SUBJECT TO OUR INSPECTION ON ARRIVAL, NOTWITHSTANDING PRIOR PAYMENT TO OBTAIN CASH DISCOUNT.
GOODS REJECTED ON ACCOUNT OF INFERIOR QUALITY OR WORKMANSHIP WILL BE RETURNED TO YOU WITH CHARGE FOR TRANSPORTATION, PLUS LABOR, RELOADING, TRUCKING, ETC. AND ARE NOT TO BE REPLACED EXCEPT UPON RECEIPT OF WRITTEN INSTRUCTIONS FORM US.

ITEM NO		PRICE
	Please Mark B/L No Merchandise Received After 3:00 P.M.	
	To cover labor, equipment, supervision to clean one (1) 3000 gal. tank. Remove and dispose legally of all resi[illegible]e	
	$1107.79	
	CONFIRMATION	
	J. Litsenmeyer	

The Vendor in performing the work required by this order shall not discriminate against any employee or applicant for employment because of age, sex, race, creed, color, national origin, or physical disability..

ACCOUNT TO BE CHARGED M616-21 (clay ay e)

ENVISION
ENVIRONMENTAL, INC.

TELEPHONE LOG

SITE NAME & LOCATION: Peram, DSI
Brownville, NY

DATE: 09/14/00

INFORMATION ON CONTACT: John Moosel (315)785-2253
NYDEC
Watertown NY

CONTACTED BY: Abraham Platt

DETAILS OF CONVERSATION:

9/14 - left a message,
- Spoke to Mr Moosel about upcoming file review in Watertown on 9/20/00

ENVISION
ENVIRONMENTAL, INC.

TELEPHONE LOG

SITE NAME & LOCATION: Roram DST
Brownsville, NY

DATE: 9/14/00

INFORMATION ON CONTACT: Ruth Earl
Records Access Officer
NY DEC
Albany NY (518) 457-5400

CONTACTED BY: Abraham Platt

DETAILS OF CONVERSATION:

No offshore records in Albany. Will check again with Regional FOIL Officer

ENVISION
ENVIRONMENTAL, INC.

TELEPHONE LOG

SITE NAME & LOCATION: Roxam DS1
Brownville, NY

DATE: 09/14/00

INFORMATION ON CONTACT: Norris Lono (578) 457-9958 (LEE) 3872
NY Emergency Response Commission
Albany NY

CONTACTED BY: Abraham Platt

DETAILS OF CONVERSATION:

Left Mr. Lono a message

09/20/00 Mr. Lono Left a message. (10:56 Am)
09/21/00 Left a message for Mr. Lono (1513)
09/22/00 Spoke to Mr. Lono - Albany Office does not have any files - Any files would be at the Regional office (Watertown)

ENVISION
ENVIRONMENTAL, INC.

TELEPHONE LOG

SITE NAME & LOCATION: RERANG, DSI
Brownville, NY

DATE: 09/14/00

INFORMATION ON CONTACT: Helen (578) 486-9846
NY DEC Div of Coastal Resources
Albany NY
578-474-459F (FAX

CONTACTED BY: Abraham Platt

DETAILS OF CONVERSATION:

Faxed copy of FOIA letters

New York State Department of Environmental Conservation
Division of Water, Region 6
207 Genesee Street, Utica, New York 13501-2885
Phone: (315) 793-2554 • FAX: (315) 793-2748
Website: www.dec.state.ny.us

John P. Cahill
Commissioner

November 4, 1999

Mayor and Village Board
Village of Brownville
Village Hall
P. O. Box 118
Brownville, New York 13615

Re: **Pretreatment Compliance Inspection,**
SPDES Permit No. NY0031232,
Brownville (V), Jefferson County

Gentlemen:

This is a follow-up letter to the Pretreatment Compliance Inspection that was performed on October 21, 1999. Please review the attached report.

For this year's inspection, several items need to be addressed. These items include:

1. industrial user sampling;
2. yearly village sampling;
3. Slug Discharge Control Plans;
4. industrial waste/chemical surveys;
5. lab report review, and;
6. permit sample type

Under 40 CFR 403.12 (e) & (h), industrial users must sample and report the findings at least twice per year. The Industrial User Permit only requires once per year sampling. The permit must be changed.

The village is required to sample the industrial user for all permit parameters at least once per year. This was not done for the pretreatment year reviewed. Failure to comply with pretreatment regulations places the village in noncompliance.

REXAM reported after my April 23, 1998 inspection that they were going to update their Slug Discharge Control Plan by July 15, 1998. Reviewing the plan on file, I was unable to find a date to determine its age. The Slug Discharge Control Plans are required to be updated every two years; this requirement must be a condition of the industrial user permit. Please ensure that a date is present on the plan.

Industrial waste surveys and industrial chemical surveys are required every three years. The last survey was conducted in 1996; one is due this year.

Grab samples are required when testing for cyanide. The lab reports showed that the sample was taken as a 24-hour composite. Please ensure that lab reports are reviewed for accuracy and all problems are reported promptly.

Trichlorophenol needs to be changed to a grab sample in the permit.

Please reply to this letter by **December 6, 1999.**

If you have any questions or would like to discuss any of the above issues, please do not hesitate to call.

Sincerely,

Chad M. Kehoe
Environmental Engineer 1
Division of Water
Region 6 - Utica

Enclosure
cc: Ann Rice, w/enclosure
CMK.m

New York State Department of Environmental Conservation
Division of Water, Region 6
207 Genesee Street, Utica, New York 13501-2885
Phone: (315) 793-2554 • **FAX:** (315) 793-2748
Website: www.dec.state.ny.us

John P. Cahill
Commissioner

Pretreatment Compliance Inspection

Village of Brownville Sewage Treatment Plant
Brownville (V), Jefferson County

Final Report

October 21, 1999

Prepared by:

Chad M. Kehoe
Environmental Engineer 1

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POTW PRETREATMENT COMPLIANCE INSPECTION CHECKLIST

PCI CHECKLIST CONTENTS

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	Section I	IU File Evaluation
☑	Section II	Supplemental Data Review/Interview
☑	Section III	Evaluation and Summary
☑	Attachment A	Pretreatment Program Status Update
☑	Attachment B	Pretreatment Program Profile
☑	Attachment C	Worksheets
		☑ WENDB Data Entry Worksheet
		☑ RNC Worksheet
		☐ IU Site Visit Report Form (Optional)
		☐ File Review Worksheets (Optional)
☐	Attachment D	Supporting Documentation

CA name and address:

of Brownville Sewage Treatment Plant
Village Hall
P.O. Box 118
Brownville, New York 13615

SPDES Permit NO. NY-0031232

Date(s) of PCI

10/21/99

Period covered by PCI

04/01/98 - 09/31/99

	Yes	No
PIRT/DSS incorporated in NPDES permit?	✓	

INSPECTOR(S)

Name	Title/Affiliation	Telephone Number
Chad M. Kehoe	*Environmental Engineer 1, DEC*	*(315) 793-2559*

CA REPRESENTATIVE(S)

Name	Title/Affiliation	Telephone Number
John Kerr	*Chief Operator**	*(315) 782-7916*
Michelle Daily	*Village Clerk*	*(315) 782-7650*

*fied program contact

ACRONYM LIST

Acronym	Term
BMR	Baseline Monitoring Report
CA	Control Authority
CFR	Code of Federal Regulations
CIU	Categorical Industrial User
CSO	Combined Sewer Overflow
CWA	Clean Water Act
CWF	Combined Wastestream Formula
DSS	Domestic Sewage Study
EP	Extraction Procedure
EPA	U.S. Environmental Protection Agency
ERP	Enforcement Response Plan
FTE	Full-Time Equivalent
FWA	Flow-Weighted Averaging
gpd	gallons per day
IU	Industrial User
IWS	Industrial Waste Survey
MGD	Million Gallons Per Day
MSW	Municipal Solid Waste
N/A	Not applicable
N/D	Not determined
NPDES	National Pollutant Discharge Elimination System
O&G	Oil and Grease
PIRT	Pretreatment Implementation Review Task Force
POTW	Publicly Owned Treatment Works
RCRA	Resource Conservation and Recovery Act
RNC	Reportable Noncompliance
SIU	Significant Industrial User
SNC	Significant Noncompliance
TCLP	Toxicity Characteristic Leachate Procedure
TRC	Technical Review Criteria
TTO	Total Toxic Organics
WENDB	Water Enforcement National Data Base

INSTRUCTIONS: Select a representative number of files to review. Provide relevant details on each file reviewed. Comment on problems identified. Where possible, all CIUs (and SIUs) added since the last PCI or audit should be evaluated. Make copies of this section to review additional files as necessary.

NARRATIVE COMMENTS

FILE *001* Industry name and address	Total flow (gpd)	Process flow (gpd)
Rexam Coverings ***Bridge Street*** ***Brownville, New York 13615***	***42,500***	***42,000***
	Type of industry (products manufactured) ***Latex Coated Paperboard***	

Industry visited during PCI	Applicable Federal category	Compliance status
Yes ☐ No ☑	***40 CFR 430.256***	☐ SNC (period: _____) ☐ Noncompliance/corrected ☐ Noncompliance/continuing

Comments

Applicable Federal Category: 40 CFR, section 430.256, subpart Y -- Non-Integrated Paperboard
Standard Industrial Code: 2631 - Paperboard Mills

Instances of non-compliance high flows, BOD and Temp industry and village work together well.

Permit Issued on 1/1/98, expires on 12/31/02.

CA Inspected IU on 5/28/99 and 12/29/98. No problems noticed.

Slug plan modified on- unable to determine

Village did not sample industry for all parameters in permit. BOD, TSS, pH and temperature only.

Categorical limits apply for Pentachlorophenol and Trichlorophenol, all other limits are local limits.

SECTION I: IU FILE EVALUATION (Continued)

NARRATIVE COMMENTS

FILE ____ Industry name and address		Total flow (gpd)	Process flow (gpd)
		Type of industry (products manufactured)	
Industry visited during PCI Yes ☐ No ☐	Applicable Federal category	Compliance status	☐ SNC (period: _____) ☐ Noncompliance/corrected ☐ Noncompliance/continuing
Comments			

FILE ____ Industry name and address		Total flow (gpd)	Process flow (gpd)
		Type of industry (products manufactured)	
Industry visited during PCI Yes ☐ No ☐	Applicable Federal category	Compliance status	☐ SNC (period: _____) ☐ Noncompliance/corrected ☐ Noncompliance/continuing
Comments			

SECTION I: IU FILE EVALUATION (Continued)

NARRATIVE COMMENTS

E ____ Industry name and address		Total flow (gpd)	Process flow (gpd)
		Type of industry (products manufactured)	
Industry visited during PCI Yes ☐ No ☐	Applicable Federal category	Compliance status	☐ SNC (period: _____) ☐ Noncompliance/corrected ☐ Noncompliance/continuing
Comments			

FILE ____ Industry name and address		Total flow (gpd)	Process flow (gpd)
		Type of industry (products manufactured)	
Industry visited during PCI Yes ☐ No ☐	Applicable Federal category	Compliance status	☐ SNC (period: _____) ☐ Noncompliance/corrected ☐ Noncompliance/continuing
Comments			

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SECTION I: IU FILE EVALUATION (Continued)

Industry Name				
Rexam DSI				
File 1	File —	File —	File —	File —

INSTRUCTIONS: Evaluate the contents of SIU files. Indicate problem areas with an (✓). Use N/A (not applicable) where necessary. Use ND (not determined) where there is insufficient information to evaluate/determine implementation status. Leave the space blank when a problem is not noted. Comment on each problem identified. Clearly identify the file that each comment pertains to; also indicate where a comment applies to all the files.

					IU FILE REVIEW	Reg. Cite
					A. CA NOTIFICATION OF IU	
					1. Notification of classification or change in classification	403.8(f)(2)(iii)
					2. Notification of applicable standards/requirements/RCRA	403.8(f)(2)(iii)

Comments

No Comments.

SECTION I: IU FILE EVALUATION (Continued)

File 1	File —	File —	File —	File —	IU FILE REVIEW	Reg. Cite
					B. ISSUANCE OF IU CONTROL MECHANISM	
					1. Issuance or reissuance of control mechanism	403.8(f)(1)(iii)
					2. Control mechanism contents	403.8(f)(1)(iii)
					a. Statement of duration (≤ 5 years)	
					b. Statement of nontransferability	
					c. Applicable effluent limits (local limits, categorical standards)	
					d. Self-monitoring requirements	
					• Identification of pollutants to be monitored	
X1					• Sampling frequency	
					• Sampling locations/discharge points	
X2					• Sample types (grab or composite)	
					• Reporting requirements	
					• Record-keeping requirements	
					e. Statement of applicable civil and criminal penalties	
					f. Compliance schedules	
					g. Notice of slug loading	
					h. Notification of spills, bypasses, upsets, etc.	
					i. Notification of significant change in discharge	
					j. 24-hour notification of violation/resample requirement	
X3					k. Slug discharge control plan requirement	

Comments

X1 - Under the pretreatment program industrial users must sample at least twice per year for all parameters listed in the permit. The permit only requires annual sampling for numerous parameters. The permit must be changed.

X2 - Sample type for Trichlorophenol must be changed to grab.

X3 - If the industry is required to develop a Slug Discharge Control Plan, the requirement must be in the permit. The permit will also state that the plan must be updated when applicable or at least every two years.

SECTION I: IU FILE EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					C. CA APPLICATION OF IU PRETREATMENT STANDARDS	
					1. IU categorization	403.8(f)(1)(ii)
					2. Calculation and application of categorical standards	403.8(f)(1)(ii)
					a. Classification by category/subcategory	
					b. Classification as new/existing source	
					c. Application of limits for all regulated pollutants	
					3. Application of local limits	403.5(c)&(d)& 403.8(f)(1)(iii)
					4. Calculation and application of production-based standards	403.6(c)
					5. Calculation and application of CWF or FWA	403.6(d)&(e)
					6. Application of most stringent limit	403.8(f)(1)(iii)

Comments

No Comments

SECTION I: IU FILE EVALUATION (Continued)

File 1	File —	File —	File —	File —	IU FILE REVIEW	Reg. Cite
					D. CA COMPLIANCE MONITORING	
					Sampling	
X1					1. Sampling (once a year)	403.8(f)(2)(v)
					2. Sampling at frequency specified in approved program	
					3. Documentation of sampling activities	403.8(f)(2)(vi)
					4. Analysis of results for all parameters	
					5. Appropriate analytical methods (40 CFR Part 136)	403.8(f)(2)(vi)
					Inspection	
					6. Inspection (once a year)	403.8(f)(2)(v)
					7. Inspection at frequency specified in approved program	
					8. Documentation of inspection activities	403.8(f)(2)(vi)
X2					9. Evaluation of need for slug discharge control plan	403.8(f)(2)(v)

Comments

X1 - The village must sample Rexam at least once per year for all parameters defined in the permit. This data was not available at the time of the Inspection.

X2 - Slug Discharge Control Plan needs to be updated at least every two years if applicable. The industry may have made changes that would eliminate the need for a Slug Discharge Control Plan. An evaluation should be made during each Inspection as to whether or not a plan is required.

SECTION I: IU FILE EVALUATION (Continued)

File	File —	File —	File —	File —	IU FILE REVIEW	Reg. Cite
					E. CA ENFORCEMENT ACTIVITIES	
					1. Identification of violations	403.8(f)(2)(vi)
X1					a. Discharge violations	
					b. Monitoring/reporting violations	
					c. Compliance schedule violations	
					2. Calculation of SNC	403.8(f)(2)(vii)
					3. Adherence to approved ERP	403.8(f)(5)
					4. Escalation of enforcement	403.8(f)(5)
					5. Publication for SNC	403.8(f)(2)(vii)

Comments

X1 - According to the Enforcement response, plan the village is required to follow-up on all violations with an NOV. If a telephone call is used, a telephone log must be placed in the file describing the conversation and any actions required to be taken by the IU. There were no NOVs in the files for the last pretreatment year, there were several instances of permit violations.

Effluent violations and reporting violations must be calculated on "rolling quarters" to determine if the noncompliance meets EPA's definition of significant noncompliance.

SECTION I: IU FILE EVALUATION (Continued)

File 1	File —	File —	File —	File —	IU FILE REVIEW	Reg. Cite
					F. IU COMPLIANCE STATUS	
					Self-Monitoring and Reporting	
					1. Sampling at frequency specified in control mechanism/regulation	403.12(e)&(h)
					2. Analysis of all required pollutants	403.12(g)(1)&(h)
					3. Submission of BMR/90-day report	403.12(b)&(d)
					4. Periodic self-monitoring reports	403.12(e)&(h)
					5. Reporting all required pollutants	403.12(g)(1)&(h)
					6. Signatory/certification of reports	403.12(l)
					7. Submission of compliance schedule reports by required dates	403.12(c)
					8. Notification within 24 hours of becoming aware of violations	403.12(g)(2)
					• Discharge violation	
					• Slug load	
					• Accidental spill	
					9. Resampling/reporting within 30 days of knowledge of violation	403.12(g)(2)
					10. Notification of hazardous waste discharge	403.12(j)&(p)
					11. Submission/implementation of slug discharge control plan	403.8(f)(2)(v)
					12. Notification of significant changes	403.12(j)

INSTRUCTIONS: Indicate the IU's noncompliance status by placing an "X" in the appropriate box.

					Discharge	
X1					13. Noncompliance with discharge limits (but not SNC)	
					14. SNC	403.8(f)(2)(vii)
					a. Chronic violations	
					b. TRC	
					c. Pass through or interference	[403.5(a)(1)]
					• Spill or slug load	[403.12(f)]
					d. Other discharge violations (specify)	
					Reporting	
					15. Noncompliance with reporting requirements (but not SNC)	403.8(f)(2)(vii)
					16. SNC with reporting requirements	403.8(f)(2)(vii)

Comments

X1 - Violations for flow, BOD and pH.

SECTION I: IU FILE EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					G. OTHER	

Comments

No Comments

CTION I COMPLETED BY: Chad M. Kehoe	*DATE: 10/21/99*
TITLE: Environmental Engineer 1	*TELEPHONE: (315)793-2559*

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SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

INSTRUCTIONS: Complete this section during the onsite visit based on CA activities since the last PCI or audit. Attach documentation where appropriate. Specific data may be required in some cases.

A. CA PRETREATMENT PROGRAM MODIFICATION [403.18]

	Yes	No
1. Did the CA make substantial changes to the pretreatment program that were not approved by the Approval Authority (e.g., definitions, limits)?		X

If yes, describe.

No Comments.

	Yes	No
2. Is the CA in the process of modifying any approved pretreatment program component (including legal authority, local limits, DSS requirements, etc.)?		X

If yes, describe.

No COmments.

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

B. IU CHARACTERIZATION [403.8(f)(2)(i)&(ii)]

1. How and when does the CA update its IWS to identify new IUs or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)]

   The village is required to perform an Industrial Waste Survey (IWS) every three years under its SPDES Permit. The last survey was performed on 12/27/96 . A survey must be conducted this year.

2. How many IUs are currently identified by the CA in each of the following groups?

a.	*1*	SIUs (as defined by the CA) [WENDB-SIUS]
	1	CIUs [WENDB-CIUS]
	0	Noncategorical SIUs
b.	*0*	Other regulated noncategorical IUs (specify)
c.	*1*	TOTAL

Rexam DSI

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

C. CONTROL MECHANISM EVALUATION [403.8(f)(1)(iii)]

a. How many SIUs (as defined by the CA) are required to be covered by an individual control mechanism? | *1*

b. How many SIUs are not covered by an existing, unexpired permit or other individual control mechanism? [WENDB-NOCM] [RNC-II] | *0* | *0%*

If any, explain.

No Comments.

How many control mechanisms were not issued within 180 days of the expiration date of the previous control mechanism? [RNC-II] | *0*

If any, explain.

No Comments.

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

D. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS

1. a. How many SIUs were not evaluated for the need to develop slug discharge control plans in the last 2 years? [403.8(f)(2)(v)] — ***0***

   b. List the SIUs below or attach additional sheets as needed.

   Rexam DSI

2. Did the CA apply all applicable categorical standards and local limits to IUs whose wastes are hauled to the POTW?

N/A	Yes	No
	X	

   If yes, identify the industries.

   Cape Vincent Correction Facility is currently transporting sanitary wastewater to the Brownville WWTP. Facility has a permit to discharge.

   If no, explain.

3. Did any IUs notify the CA of a hazardous waste discharge? [403.12(j)&(p)]

Yes	No
	✓

   If yes, identify and explain.

   No Comments.

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

COMPLIANCE MONITORING

1. Identify the following.

Program Aspect	Required Frequency	Actual Frequency	Explain Difference
a. Inspection			
• CIUs	*annual*	*annual*	
• Other SIUs	*N/A*	*N/A*	
b. Sampling (by CA)			
• CIUs	*2X/mo*	*2X/mo*	*BOD, TSS, 6-hour composite 2X/month*
• Other SIUs	*N/A*	*N/A*	
c. Self-Monitoring			
• CIUs	*Bi-monthly*	*Bi-monthly*	*The permit defines this as twice per month*
• Other SIUs	*N/A*	*N/A*	
d. Reporting			
• CIUs	*Monthly*	*Monthly*	
• Other SIUs	*N/A*	*N/A*	

2. In the past 12 months, how many, and what percentage of, SIUs were the following? [403.8(f)(2)(v)] [WENDB-NOIN] [RNC-II]

a. Not sampled or not inspected at least once [WENDB-NOIN]	*0*	*0%*
b. Not sampled at least once	*0*	*0%*
c. Not inspected at least once	*0*	*0%*

If any, explain.

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

F. ENFORCEMENT

1. Which of the following enforcement actions did the CA use?

	N/A	Yes	No
a. Notice or letter of violation		✓	
b. Administrative Orders			✓
c. Administrative fines			✓
d. Show cause hearings			✓
e. Compliance schedules			✓
f. Permit revocation			✓
g. Civil suits			✓
h. Criminal suits			✓
i. Termination of service			✓
j. Other (specify)		✓	

Explain if appropriate.

Phone call to CIU.

2. Did the CA comply with its approved ERP? [403.8(f)(5)] [RNC-II]

N/A	Yes	No
	✓	

3. Indicate the number and percent of SIUs that were identified as being in SNC* with the following requirements for the most recent full quarter.

SNC Evaluation Period: ***10/98 - 09/99***

0	*0%*	Applicable pretreatment standards and reporting requirements
0	*0%*	Self-monitoring requirements
0	*0%*	Pretreatment compliance schedules

*SNC defined by:

POTW	
EPA	✓

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

ENFORCEMENT (Continued)

	Yes	No
4. Did the CA publish all SIUs in SNC in the largest daily newspaper in accordance with NPDES permit requirements? [403.8(f)(2)(vii)]	✓	

If yes, attach a copy.

If no, explain.

REXAM was published 7/21/98 for late reporting in the 1997 pretreatment year. Rexam will not need to be published this year.

5. How many SIUs are in SNC with self-monitoring requirements and were not inspected and/or sampled (in the four most recent full quarters)? [WENDB-SNIN]	*0*

6. a. Did the CA experience any of the following caused by industrial discharges?

	Yes	No	Unk	Explain
• Interference		✓		
• Pass through		✓		
• Fire or explosions (flashpoint, etc.)		✓		
• Corrosive structural damage		✓		
• Flow obstructions		✓		
• Excessive flow rates		✓		
• Excessive pollutant concentrations		✓		
• Heat problems		✓		
• Interference due to O&G		✓		
• Toxic fumes		✓		
• Illicit dumping of hauled wastes		✓		
• Worker health and safety		✓		
• Other (specify)				

	Yes	No
b. If yes, did the CA take enforcement action against the IUs causing or contributing to pass through or interference? [RNC-I]		

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

F. ENFORCEMENT (Continued)

7. a. How many SIUs are on compliance schedules? **0**

   b. List these SIUs by name and compliance schedule end dates (attach additional sheets as needed).

SIU	End Date

8. Were any CIUs allowed more than 3 years from the effective date of a categorical standard to achieve compliance? [403.6(b)]

   If yes, identify and explain.

Yes	No

9. Did the SIUs return to compliance by any of the following? [RNC-I]

	Yes	No
a. Within 90 days	✓	
b. Within the time specified in the ERP	✓	
c. Through a compliance schedule		✓

G. ADDITIONAL EVALUATIONS

INSTRUCTIONS: Attach additional sheets as needed.

No Comments.

SECTION II COMPLETED BY: ***Chad M. Kehoe***	*DATE:* ***10/21/99***
TITLE: ***Environmental Engineer 1***	*TELEPHONE:* ***(315) 793-2559***
POTW REPRESENTATIVE ***Michelle Dailey***	*DATE:* ***10/21/99***
PROVIDING RESPONSES: ***Village Clerk***	*TELEPHONE:* ***(315) 782-7916***

SECTION III: EVALUATION AND SUMMARY

INSTRUCTIONS: Identify program components that the CA is recommended (Rec.) or required (Req.) to implement in order effectively implement the pretreatment program and/or to meet its regulatory requirements. Specify the corrective action the needs to take.

Description	Regulatory Citation	Checklist Question(s)	Action	
			Rec.	Req
A. CA PRETREATMENT PROGRAM MODIFICATION				
1. Notify of program modification	403.18	II.A		
N/A				
B. IU CHARACTERIZATION				
1. Identify and locate all SIUs	403.8(f)(2)(i)	II.B		✓
Perform IWS and ICS for village this year, last one was done in 1996.				
2. Identify the character and volume of pollutants contributed to POTW by IUs	403.8(f)(2)(ii)	II.B.1; II.E.1		
Continue to monitor Users to determine loadings.				
C. CONTROL MECHANISM EVALUATION				
1. Issue individual control mechanisms to all SIUs	403.8(f)(1)(iii)	I.B.1; II.C.1&2		
Issued 01/01/98, expires 12/31/02.				

SECTION III: EVALUATION AND SUMMARY (Continued)

Description	Regulatory Citation	Checklist Question(s)	Action Rec.	Action Req
C. CONTROL MECHANISM EVALUATION (Continued)				
2. Ensure control mechanisms contents include:	403.8(f)(1)(iii)	I.B.2.a-j		✓
a. A statement of duration b. A statement of nontransferability c. Effluent limits d. Self-monitoring requirements e. A statement of penalties f. Compliance schedules g. Notice of slug loading h. Notification of spills, bypasses, upsets, etc. i. Notification of significant change in discharge j. 24-hour notification of violation/resample requirement ***X1 - A section needs to be added regarding Slug Discharge Control Plans.*** ***X2 - Sampling for metals needs to be changed to twice per year.***				
D. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS				
1. Apply all applicable pretreatment standards	403.8(f)(1)(ii); 403.5	I.C.1-6; II.D.2		
Done.				
2. Evaluate the need for SIUs to develop slug discharge control plans	403.8(f)(2)(v)	I.D.9; II.D.1		✓
Slug discharge control plan needs to be updated every two years. The current plan does not have a date on it. There is a letter on file with some updates dated June 30, 1998. This should accompany the plan to ensure that anyone that needs to see the plan will get the most current information.				
E. COMPLIANCE MONITORING				
1. Inspect and sample each SIU in accordance with approved program	Approved program	I.D.2&7; II.E.1		✓
Inspection forms were on file, however, no sampling data could be found.				

SECTION III: EVALUATION AND SUMMARY (Continued)

Description	Regulatory Citation	Checklist Question(s)	Action Rec.	Action Req
E. COMPLIANCE MONITORING (Continued)				
2. Inspect and sample each SIU once a year	403.8(f)(2)(v)	I.D.1&6; II.E.1&2		✓
Inspection forms were on file, however, no sampling data could be found. Please forward these as soon as possible.				
3. Use proper sampling analysis (40 CFR Part 136) and Inspection procedures	403.8(f)(2)(vi)	I.D.3,5&8		✓
Check to ensure proper procedures were used when lab results are submitted. The lab reports showed that Cyanide was taken as a 24hr composite, it should be a grab.				
4. Require, receive, and analyze reports from SIUs	403.8(f)(2)(iv)	I.B.2.d; I.F.1-12; II.E.1		✓
This report must be reviewed for compliance with the IUP within 7 days. Any deficiencies must be corrected according to the ERP.				
Ensure that all violations are followed up with a NOV.				
5. Monitor to demonstrate continued compliance and resampling after violation(s)	403.12(g)(1)&(2)	I.F.3,4&9		
6. Ensure CIUs report on all regulated pollutants at least once every 6 months	403.12(g)(1)	I.F.2&5		
Rexam is submitting its report to EPA semi-annually to show compliance with chlorophenolic biocides effluent limitations.				

SECTION III: EVALUATION AND SUMMARY (Continued)

Description	Regulatory Citation	Checklist Question(s)	Action Rec.	Action Req
E. COMPLIANCE MONITORING (Continued)				
7. Ensure noncategorical SIUs self-monitor and report all regulated pollutants at least once every 6 months ***N/A***	403.12(h)	I.F.2&5		
8. Require self-monitoring reports from CIUs to be signed and certified and reports from SIUs to be signed ***Done***	403.12(l); 403.6(a)(2)(ii)	I.F.6		
9. Receive notification of hazardous waste discharges	403.12(j)&(p)	I.F.10; II.D.3		
F. ENFORCEMENT				
1. Implement approved ERP ***The village is using sheets supplied by Rich Coriale(DEC) to track compliance.***	403.8(f)(5)	I.E.3; II.F.2		
2. Annually publish a list of IUs in SNC ***N/A***	403.8(f)(2)(vii)	I.E.5; II.F.4		

SECTION III: EVALUATION AND SUMMARY (Continued)

Description	Regulatory Citation	Checklist Question(s)	Action Rec.	Action Req
F. ENFORCEMENT (Continued)				
3. Develop IU compliance schedules *N/A*	403.8(f)(1)(iv)(A)	I.B.2.f; II.F.1,7&9		
4. Ensure IU compliance within 3 years of standards effective date (or less than 3 years where required by standard) *N/A*	403.6(b)	II.F.8		
5. Ensure new sources report on compliance with appropriate standards within the first 90 days of discharge ***Perform IWS to identify new sources. A separate file must be kept on all potential IU's that are surveyed. This must be kept along with the other pretreatment files.***	403.12(d)	I.F.3		
G. ADDITIONAL EVALUATIONS				
NoComments.				

SECTION III COMPLETED BY: Chad M. Kehoe *TITLE: Environmental Engineer 1*	*DATE: 10/21/99* *TELEPHONE: (315)793-2559*

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PRETREATMENT PROGRAM STATUS UPDATE

INSTRUCTIONS: This attachment is intended to serve as an update of program status. It should be updated prior to each PCI ed on information obtained from the most recent PCI and/or audit and the last pretreatment program performance report.

A. CA INFORMATION

1. CA name *Village of Brownville*

2. a. Pretreatment contact *John Kerr*	b. Mailing address *P.O. Box 118, Brownville, New York 13615*
c. Title *Chief Operator*	d. Telephone number *(315) 782-8130*

3. Date of last CA report to Approval Authority *October 21, 1999*

4. Is the CA currently operating under any pretreatment-related consent decree, Administrative Order, compliance schedule, or other enforcement action?	Yes	No
		✓

5. Effluent and sludge quality

a. List the NPDES effluent and sludge limits violated and the suspected cause(s).

Parameters Violated	Cause(s)

b. Has the treatment plant sludge violated these tests?	Yes	No
• EP toxicity		
• TCLP		

B. PRETREATMENT PROGRAM STATUS

1. Indicate components that were identified as deficient.

	Last PCI Date: *04/23/98*	Last Audit Date: *ND*	Program Report Date: *10/21/99*
a. Program modification			
b. Legal authority			
c. Local limits	✓		
d. IU characterization			
e. Control mechanism	✓		
f. Application of pretreatment standards			
g. Compliance monitoring	✓		
h. Enforcement program	✓		
i. Data management	✓		
j. Program resources			
k. Other (specify)			

B. PRETREATMENT PROGRAM STATUS (Continued)

2. Is the CA presently in RNC for any of these violations?

	Data Source	Yes	No
a. Failure to enforce against pass through and/or interference [RNC-I][SNC]	*PCI*		✓
b. Failure to submit required reports within 30 days [RNC-I][SNC]			✓
c. Failure to meet compliance schedule milestones within 90 days [RNC-I][SNC]			✓
d. Failure to issue/reissue control mechanisms to 90 percent of SIUs within 6 months [RNC-II]			✓
e. Failure to inspect or sample 80 percent of SIUs within the last 12 months [RNC-II]			
f. Failure to enforce standards and reporting requirements [RNC-II]			✓
g. Other (specify) [RNC-II]			

3. List SIUs in SNC identified in the last pretreatment program performance report, PCI, or audit (whichever is most recent).

Name of SIU in SNC	Compliance Status	Source

4. Indicate the number and percent of SIUs that were identified as being in SNC* with the following requirements from the CA's last pretreatment program performance report. If the CA's report does not provide this information, obtain the information for the most recent four full quarters during the PCI.

SNC Evaluation Period: **10/98 - 09/99**

0	*0%*	Applicable pretreatment standards and reporting requirements
0	*0%*	Self-monitoring requirements
0	*0%*	Pretreatment compliance schedules

*SNC defined by:

POTW	✓
EPA	

5. Describe any problems the CA has experienced in implementing or enforcing its pretreatment program.

The CA and the IU have a good working relationship. Any noncompliance problems are resolved with the same day. The majority of these problems are operational problems.

ATTACHMENT A COMPLETED BY: ***Chad M. Kehoe***	*DATE:* ***10/21/99***
TITLE: ***Environmental Engineer 1***	*TELEPHONE:* ***(315)793-2559***

WENDB DATA ENTRY WORKSHEET

INSTRUCTIONS: Enter the data provided by the specific checklist questions that are referenced.

CA name ***Brownville (V) Wastewater Treatment Facility***

NPDES number ***NY-0031232***

Date of inspection ***October 21, 1999*** | Date entered into PCS ***ND***

	PCS Code	Checklist Reference	Data
• Number of SIUs*	SIUS	II.B.2.a	***1***
• Number of CIUs	CIUS	II.B.2.a	***1***
- Number of SIUs without control mechanism	NOCM	II.C.1.b	***0***
- Number of SIUs not inspected or sampled	NOIN	II.E.2	***1***
- Number of SIUs in SNC** with standards or reporting	PSNC	Att. A.B.4	***0***
- Number of SIUs in SNC with self-monitoring	MSNC	Att. A.B.4	***0***
- Number of SIUs in SNC with self-monitoring and not inspected or sampled	SNIN	II.F.5	***0***

*The number of SIUs entered into PCS is based on the CA's definition of "Significant Industrial User."

**As defined in EPA's 1986 Pretreatment Compliance Monitoring and Enforcement Guidance.

WENDB DATA ENTRY WORKSHEET COMPLETED BY: ***Chad M. Kehoe***

TITLE: ***Environmental Engineer 1***

DATE: ***10/21/99***

TELEPHONE: ***(315)793-2559***

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II. RNC WORKSHEET

TRUCTIONS: Place a check in the appropriate box on the left if the CA is found to be in RNC or SNC.

CA name ***Brownville (V) Wastewater Treatment Facility***

NPDES number ***NY-0031232***

Date of inspection ***October 21, 1999*** | Date entered into QNCR ***ND***

		Level	Checklist Reference
	Failure to enforce against pass through and/or interference	I	II.F.6.b&9
	Failure to submit required reports within 30 days	I	Att. A.A.3
	Failure to meet compliance schedule milestone date within 90 days	I	Att. A.A.4
	Failure to issue/reissue control mechanisms to 90% of SIUs within 6 months	II	II.C.1.b&2
X	Failure to inspect or sample 80% of SIUs within the last 12 months	II	II.E.2
	Failure to enforce pretreatment standards and reporting requirements	II	II.F.2
	Other (specify)	II	

SNC

	CA in SNC for violation of any Level I criterion
	CA in SNC for violation of two or more Level II criterion

For more information on RNC, please refer to EPA's 1990 Guidance for Reporting and Evaluating POTW Noncompliance with Pretreatment Implementation Requirements.

RNC WORKSHEET COMPLETED BY: ***Chad M. Kehoe***
TITLE: ***Environmental Engineer 1***
DATE: ***10/21/99***
TELEPHONE: ***(315)793-2559***

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Village of Brownville

Brownville, N. Y.
13615

December 2, 1999

New York State Department of Environmental Conservation
Division of Water, Region 6
207 Genesee Street
Utica, New York 13501-2885

Re: Pretreatment Compliance Inspection
SPDES Permit No. NY0031232

Dear Chad,

The following is a response to the inspection at the Village of Brownville conducted on October 21, 1999. Code: 63-94 Permit modifications.

1. Industrial User Sampling: (Semi-annual periodic compliance reports submitted by July 1st January 1st, each year. Part 3; A; J of IUP. Amended permit has been sent to industrial user indicating the change from annual to semi-annual sampling where applicable.

2. Yearly Village Sampling: The village sampled the industrial user on December 1, 1999. The village will sample the industrial user before October in the future.

3. Slug Discharge Control Plan: The Industrial User has been notified as of December 2, 1999 that they have 30 days to review & update if necessary there SDCP.

4. Industrial Waste Questionnaire/Chemical Surveys: The Industrial User has been sent a IWQ/Chemical Survey as of December 2, 1999 and given 30 days to return the survey.

5. Lab Report Review: All Lab reports will be reviewed checking all pertinent information including type of samples.

6. Permit Sample Type: IUP was amended 12/5/98 eliminating Trichlorophenol and Pentachloropenol. Total Phenol was included in the 12/21/98 amended permit.

Sincerely,

Robert Hoselton
Operator

cc: Anne Rice - DEC

Brownville Pretreatment File

From: Richard Coriale
To: REG61.UTICA(cmkehoe)
Date: 9/21/98 9:08am
Subject: Waste haulers. -Reply

Waste haulers are a critical part of the domestic loading equation. Many POTWs get into trouble with waste haulers because they don't account for the loading or the strength of the waste. I made it a point to regulate all waste haulers. When a POTW is having operational problems, this is the first source that we cut off.

I used the EPA Permitting Guidance Manual to establish what type of control mechanism that I wanted the POTWs to use. The POTW must sample the load according to the EPA Compliance and Enforcement Manual, page 2-3, which gives a table relating flows to sampling schedules. The POTW must use this data to calculate the loading from the facility. Once per year the POTWs must perform a mass balance to show how the influent loading compares to the design of the POTW.

This should be a hand calculation for a POTW like Brownville. They are sampling the domestic side twice per year and only have one industry. The equation should look like this:

1. Domestic Loading (#/day = concentration X domestic flow x 8.345)
2. Industrial Loading (#/day = concentration x industrial flow x 8.345)
3. Other Sources (#/day = concentration x flow x 8.345)

4. Influent Loading (#/day = Avg Conc x 30 day avg flow x 8.345.

The POTW submitted an O & M manual to Ann Rice a few years back. Get a copy of this manual and locate where the engineering firm states the design/maximum organic (BOD, TSS) loading to the plant. At some point the POTW should verify this number, because it is not alway correct.

Remember that the history of this POTW is that it is has a lot of I/I problems, which means that the influent stream is very diluted. They are actually low in BOD strength (80 - 120 mg/l). Typically, domestic waste to a POTW is around 250 mg/l.

The pretreatment program has four goals: 1. prevent pass-through, 2. prevent inhibition 3. protect worker health and safety and 4. protect sludge disposal options. You should work with Ann Rice to make sure the loading is not affecting the operations of the plant, as well as, determine the maximum amount that can be accepted by the POTW.

Good Luck.

Village of Brownville

Brownville, N. Y.
13615

RECEIVED
JUL - 2 1998
ENVIRONMENTAL QUALITY
REGION 6

June 29, 1998

NYS Department of Environmental Conservation
Division of Water, Region 6
207 Genesee Street
Utica, New York 13501-2885

Dear Mr. Kehoe, Re: Pretreatment Compliance Inspection

This is a follow-up letter to your letter dated May 20, 1998 in reference to the inspection on April 23, 1998.

The following items we were asked to address to the best of our ability.

1. Reporting Requirements: Please explain is it Rexam DSI or the village's reporting that you are referencing and what type of reports are we addressing.

2. Publishing of SNC's: We will be using the Watertown Daily Times, all data will be reviewed October 1st. for the physical period, any non compliance will be published.

3. Slug Discharge Control: We do have the Slug Discharge Control Plan filed at the village office, the industry was notified by letter and is in the process of updating the plan and from this day on the plan will be updated every two years.

4. Yearly Sampling Data: We are not quite sure what your asking for, previous to this date we have sampled twice a month BOD/TSS, also sample daily for PH and temperature. From this day forward the Village will sample DSI's end of process and end of pipe annually for all parameters listed in the IUP and Village Sewer Use Ordinance.

5. Local limits development: The village hired an Engineering firm in 1994 to complete the Headwork's analysis. A letter was submitted to the DEC copy of letter enclosed.

6. Industrial Waste/chemical surveys: the IWQ produced by the village of Brownville was completed on 6/12/98 this also includes required chemical surveys.

7. Permit renewal: the application was submitted within the requirements of the IUP (180 days) prior to end of application period.

8. FROSI report: was submitted however late. We have sent notice of violation asking for assurances this will not happen again.

One question that we have is because the Village of Brownville is under one million gal. flow we were always under the impression that we were under the states mini pre-treatment. In the past Rich seemed to be reasonably pleased. As far as the NOV we now have a numerical system for the NOV's making it easier for us and for you in the future.

If I can be of further assistance please call.

Sincerely,

Michele Dailey

Michele Dailey
Village Clerk-Treasurer

Village of Brownville

Brownville, N. Y.
13615

RECEIVED
DEC
ENVIRONMENTAL QUALITY
REGION 6

November 27, 1996

NYS Department of Environmental Conservation
Richard Coriale - Engineer
206 Genesee St.
Utica, New York 13501

Dear Rich,

In response to your letter dated November 19, 1996 we have accomplished the following.

1. Rexam's permit has been corrected in two areas, monitoring and sampling type per your request.

2. Notices of Violation: I talked with John Kerr as you did and he will be correcting the notice of violations per your recommendation.

3. Industrial Waste Survey: the Mayor has placed a letter in the file which should be good for three years noting that there have been no new industrial users in the village. I also have contacted the Village of Glen Park to send us a letter when they finish their industrial waste survey.

If you have any further questions please contact me.

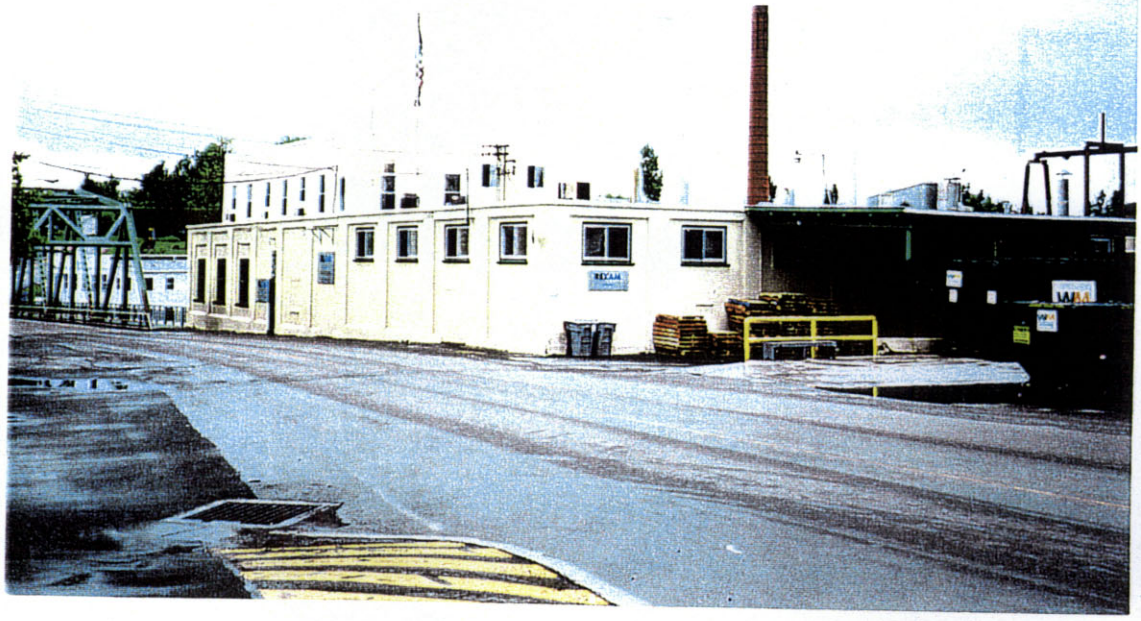
Sincerely,

Michele Dailey
Village Clerk

cc: Anne Rice, NYSDEC

APPENDIX 54

Photograph Log



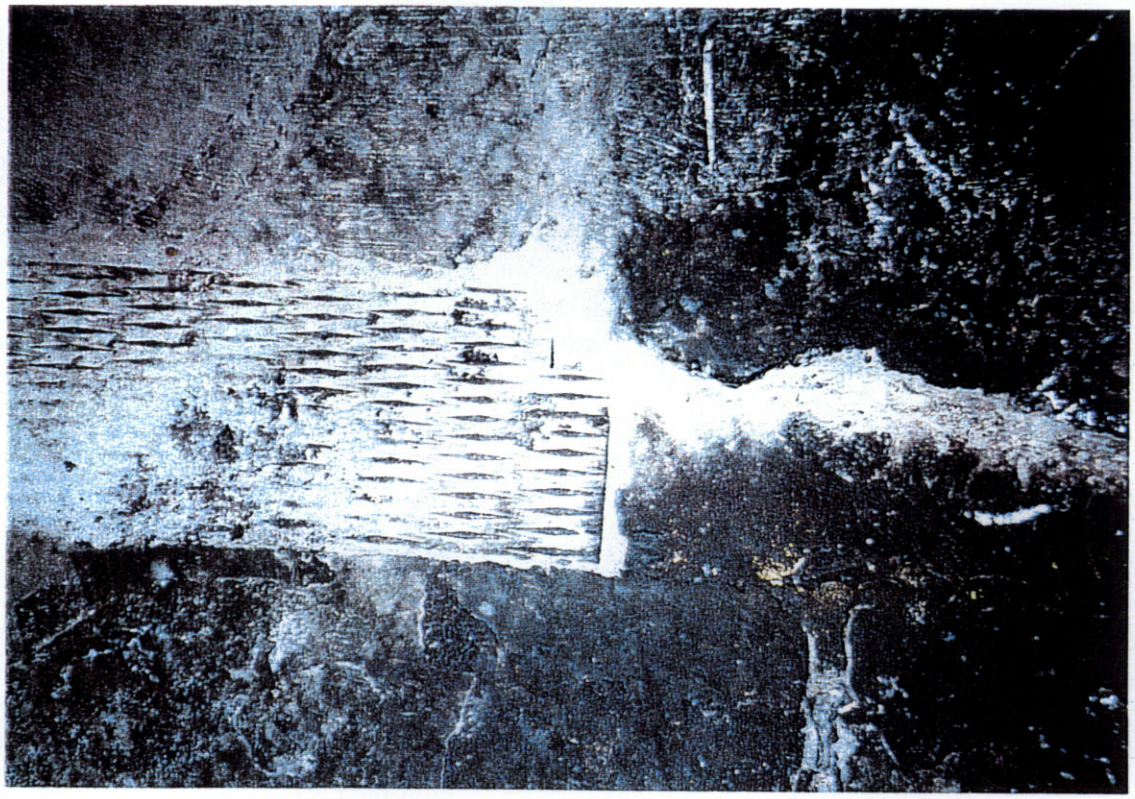
REXAM DSI FACILITY BRIDGE STREET ENTRANCE

FACING S. W. TOWARD BLACK RIVER

VILLAGE OF BROWNVILLE POTW

WATER TOWER

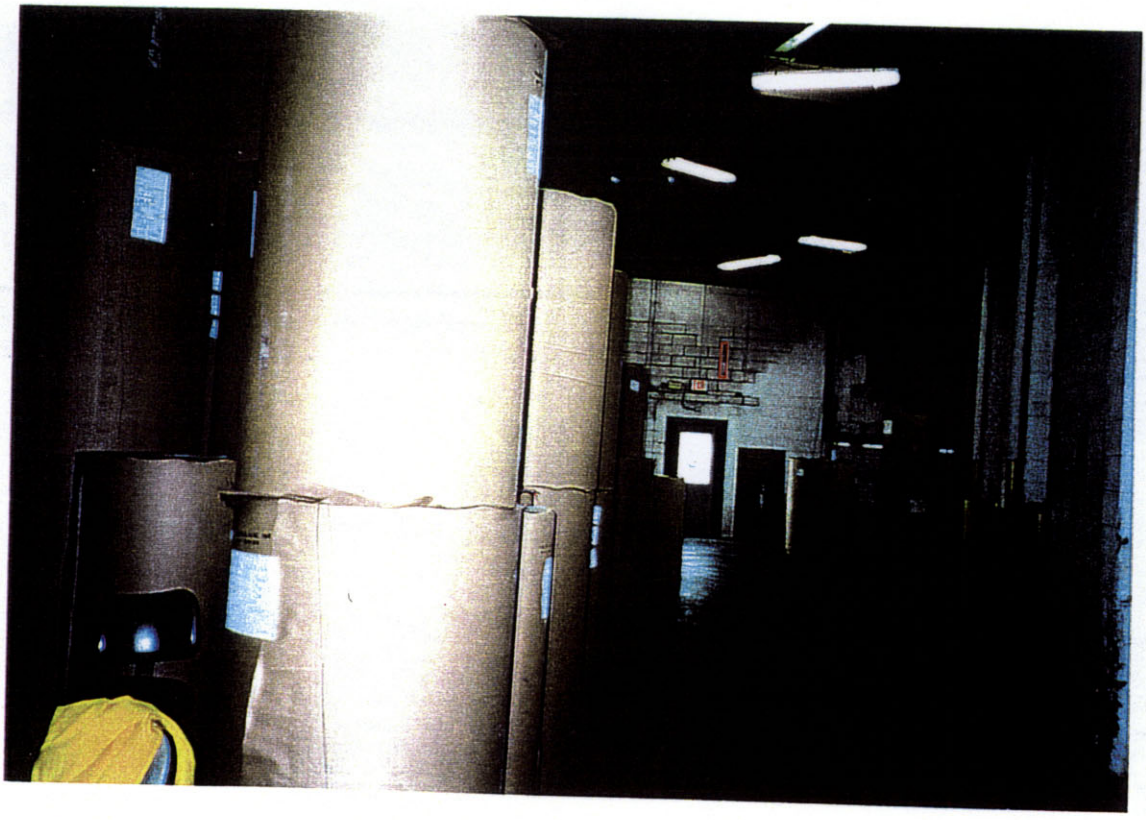
PHILOMEL CREEK



SEALED DRAIN IN WAREHOUSE FILLED WITH MATERIAL

CRACKS IN WAREHOUSE FLOOR

WAREHOUSE RAW MATERIALS

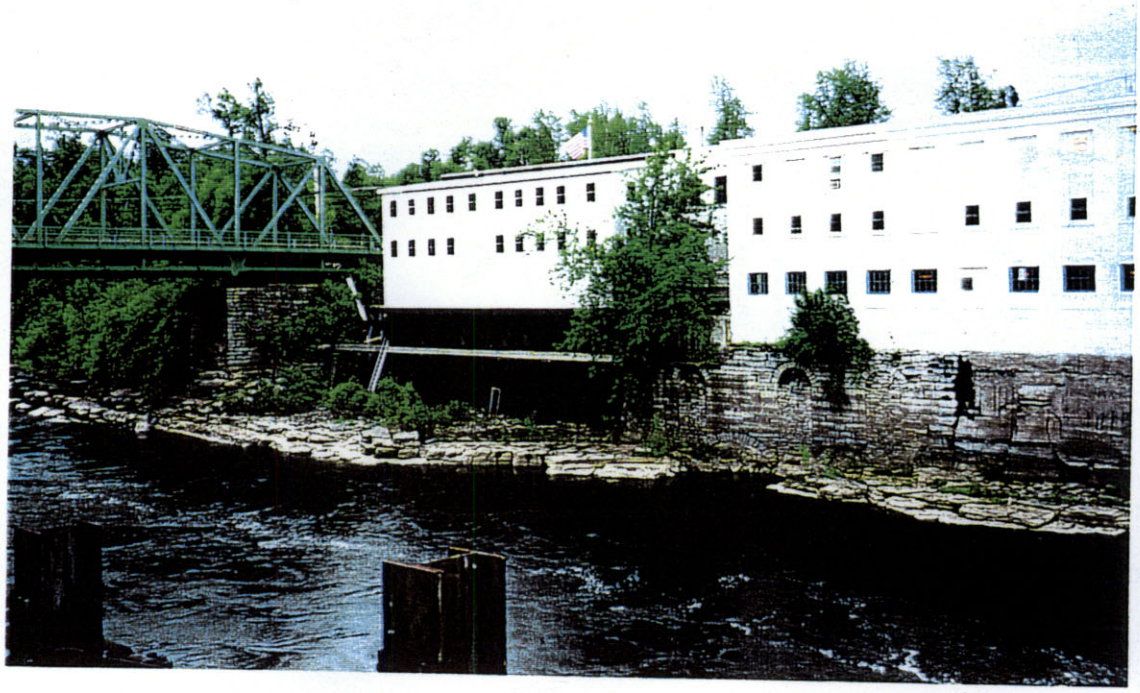


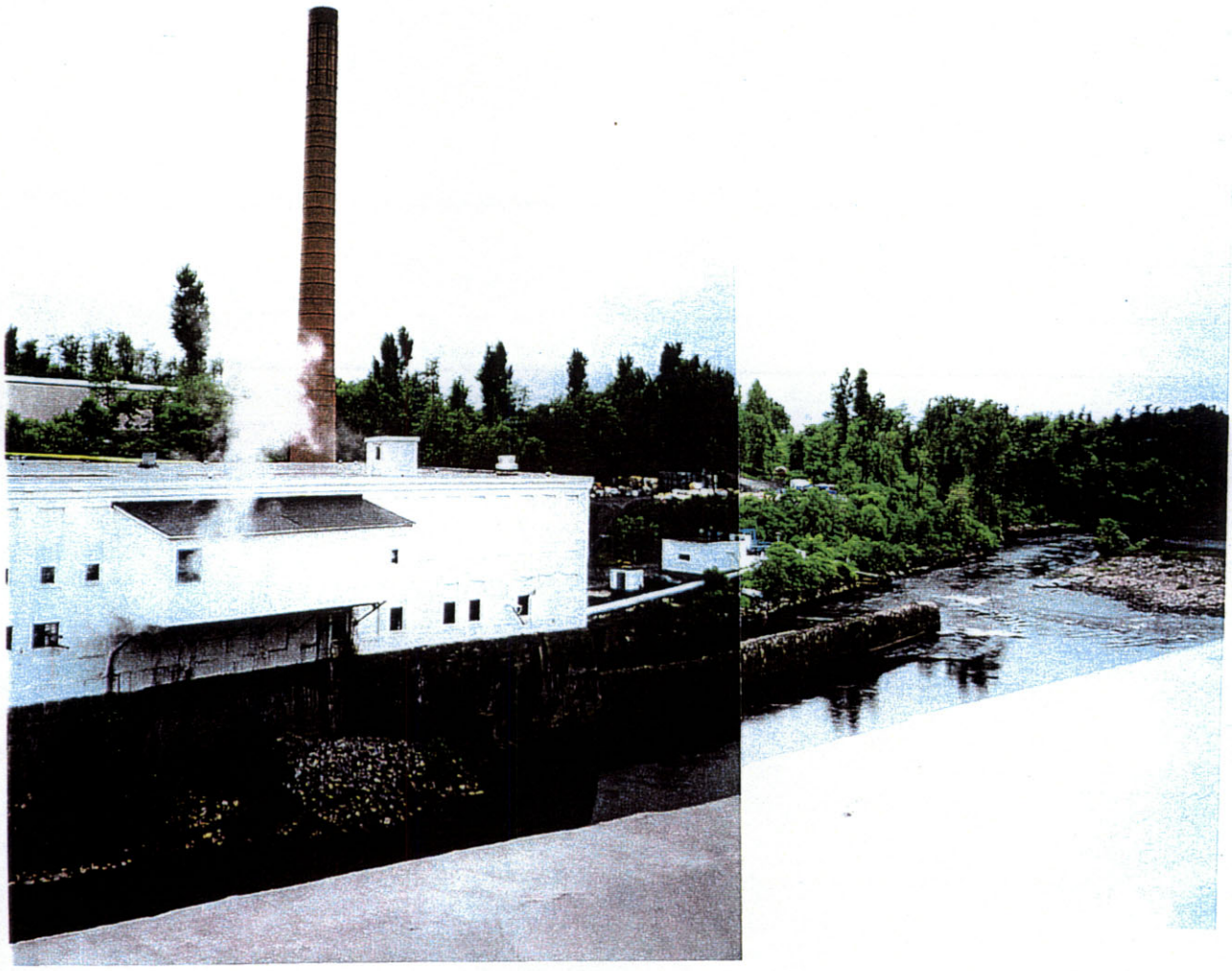
WAREHOUSE FINISHED PRODUCT STORAGE

DELIVERY DRIVEWAY SOLID WASTE PARKING AREA

STORM DRAIN NEAR DUMPSTER

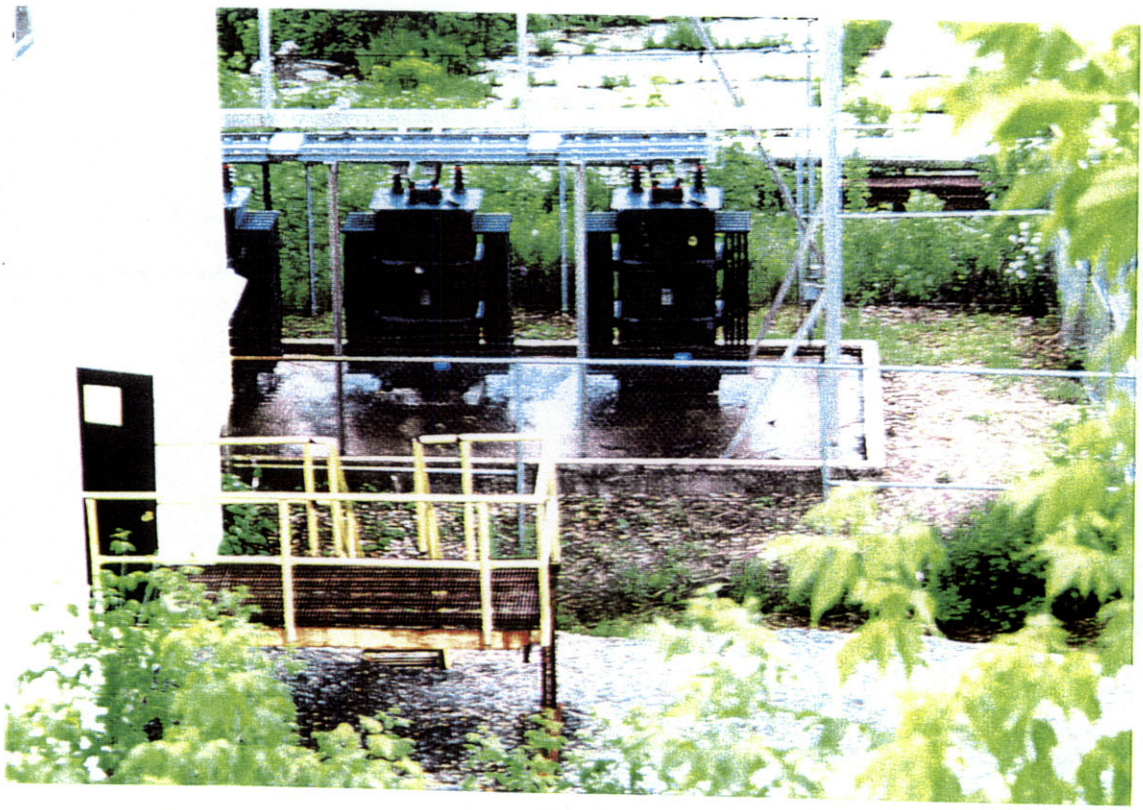
WAREHOUSE DUMPSTER



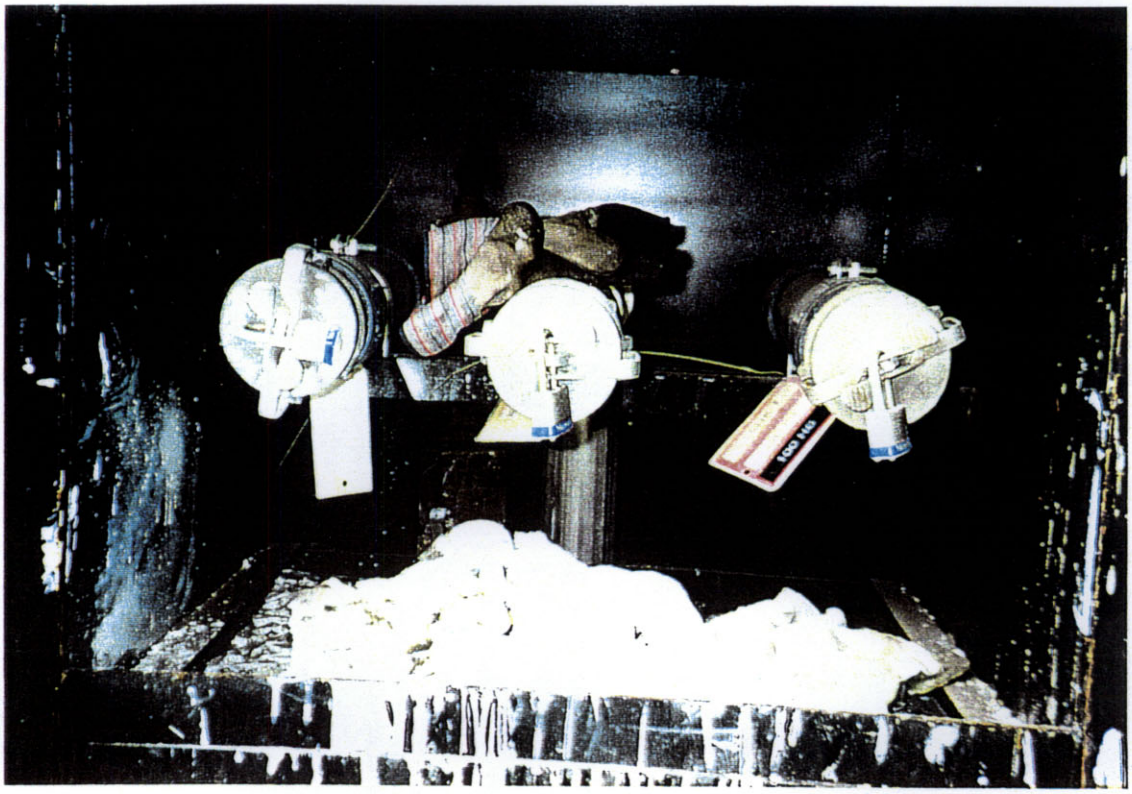


BROWNVILLE SPECIALTY PAPER PRODUCTS ACROSS BLACK RIVER

FUEL OIL FILL STATION IN DRIVEWAY



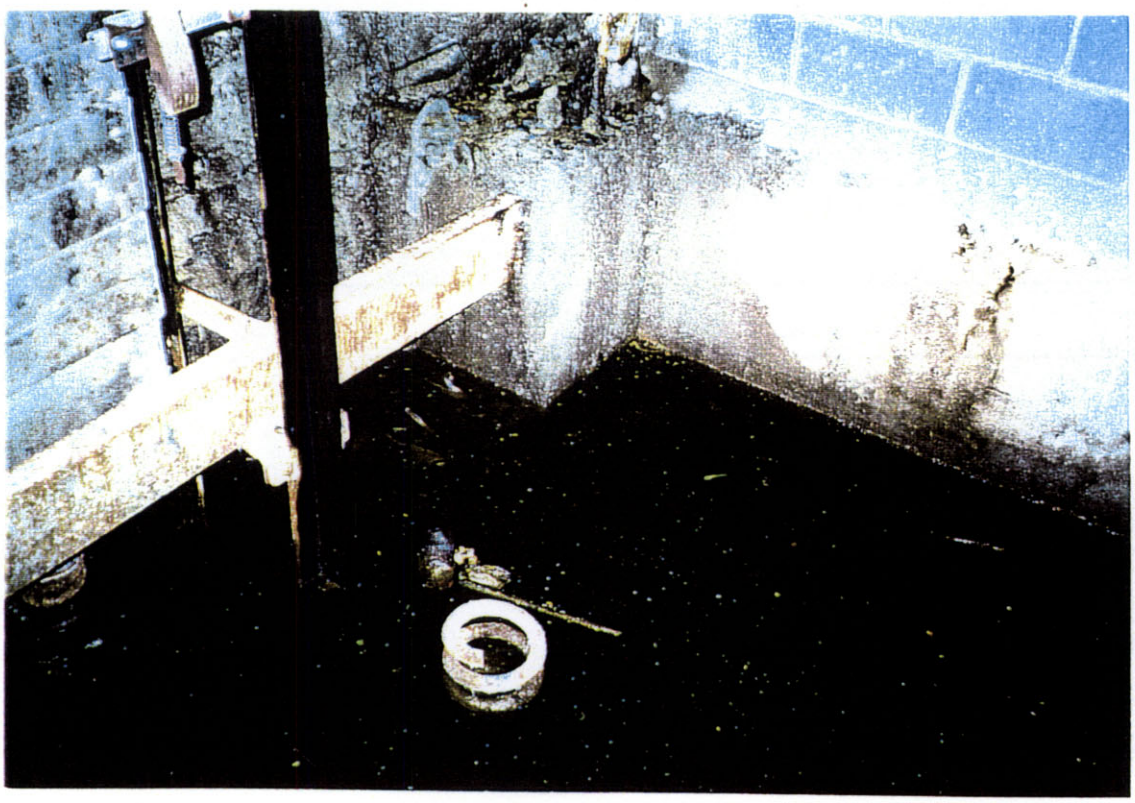
TRANSFORMER SUB-STATION



BULK RAW MATERIAL FILL STATION IN DRIVEWAY

BULK RAW MATERIAL FILL STATION FOR WASTEWATER SYSTEM

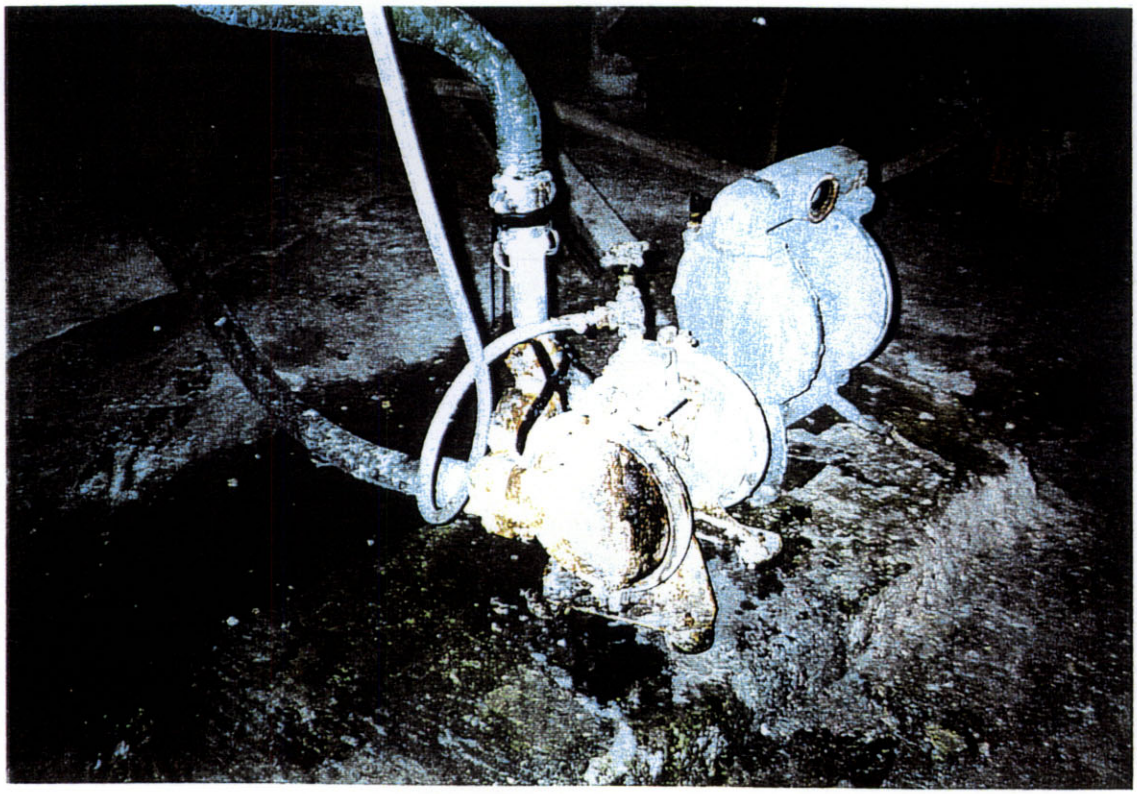
HIGH WATER MARK, 1993



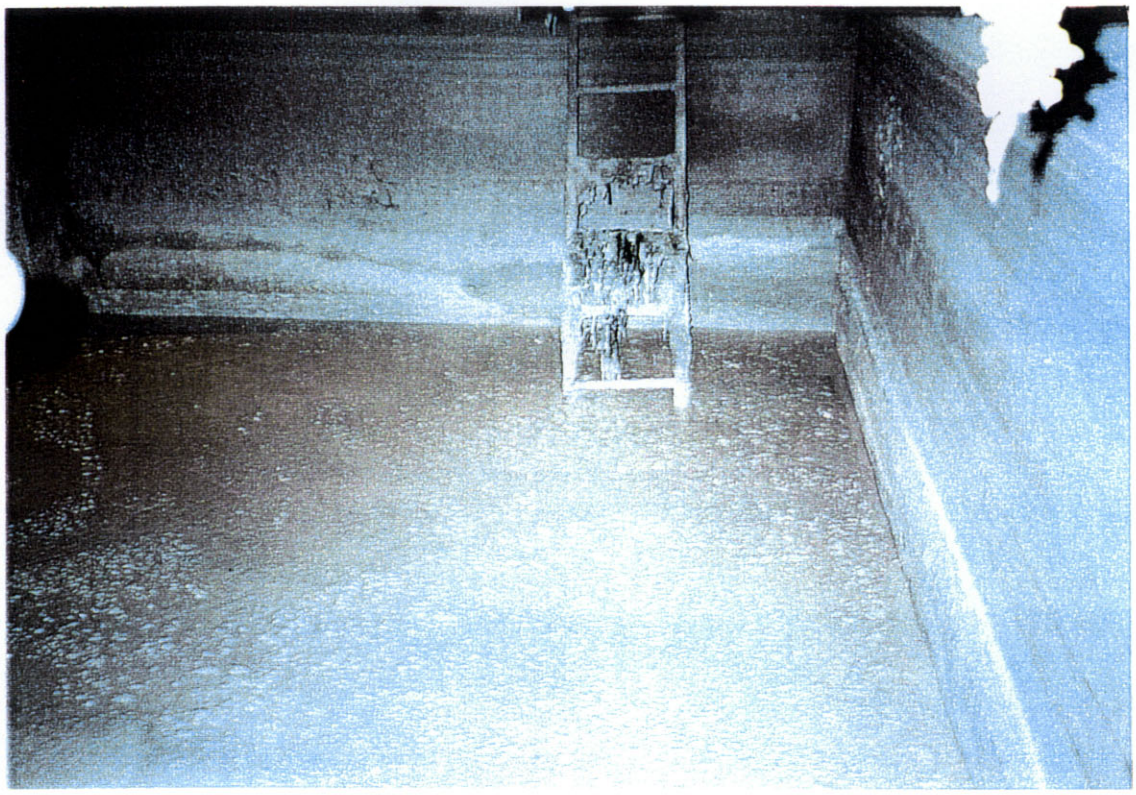
WATER IN ELEVATOR SHAFT

FUEL OIL STAINING OF LIMESTONE WALLS

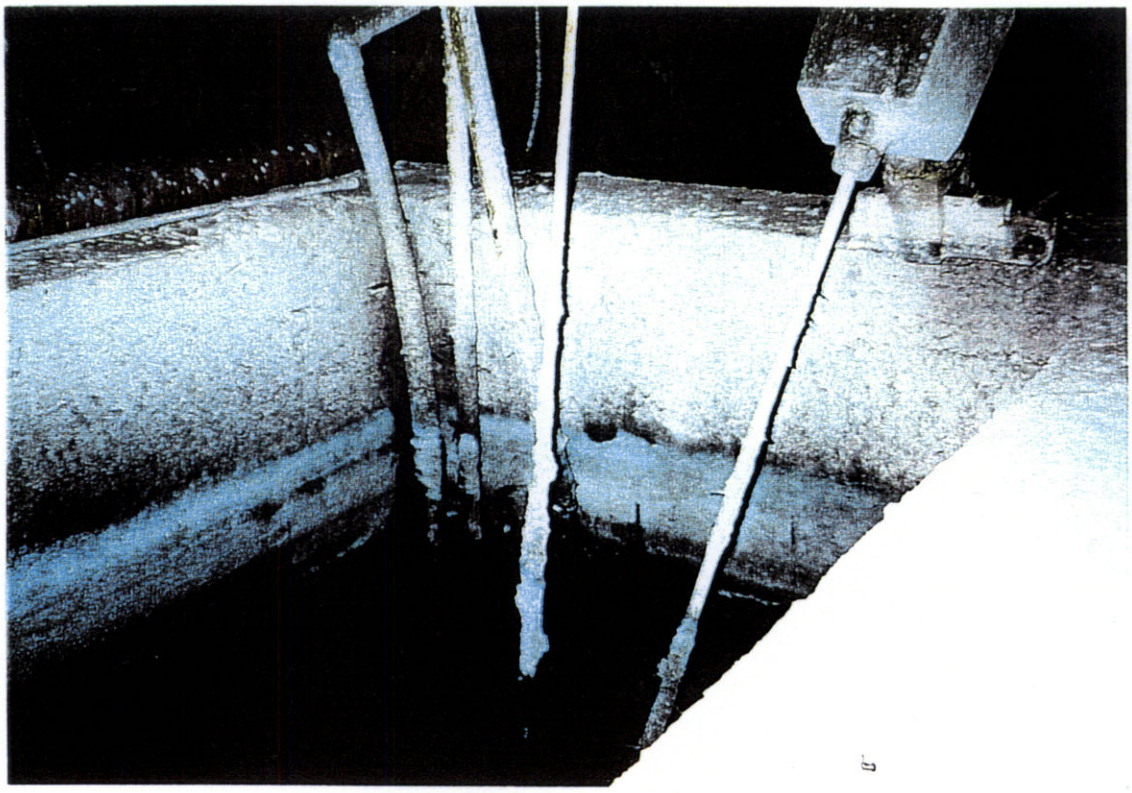
OIL CONTAMINATED MATERIAL ON 4TH FLOOR



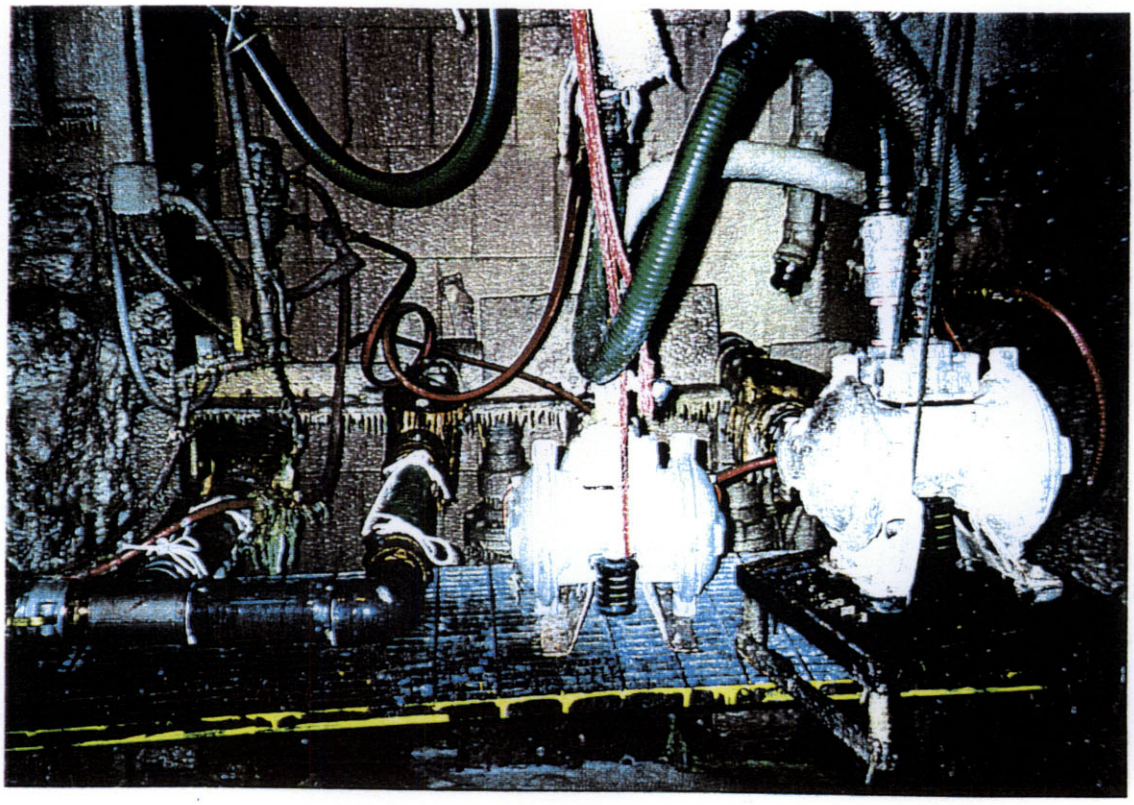
WASTEWATER RECYCLING PUMP ON 4TH FLOOR



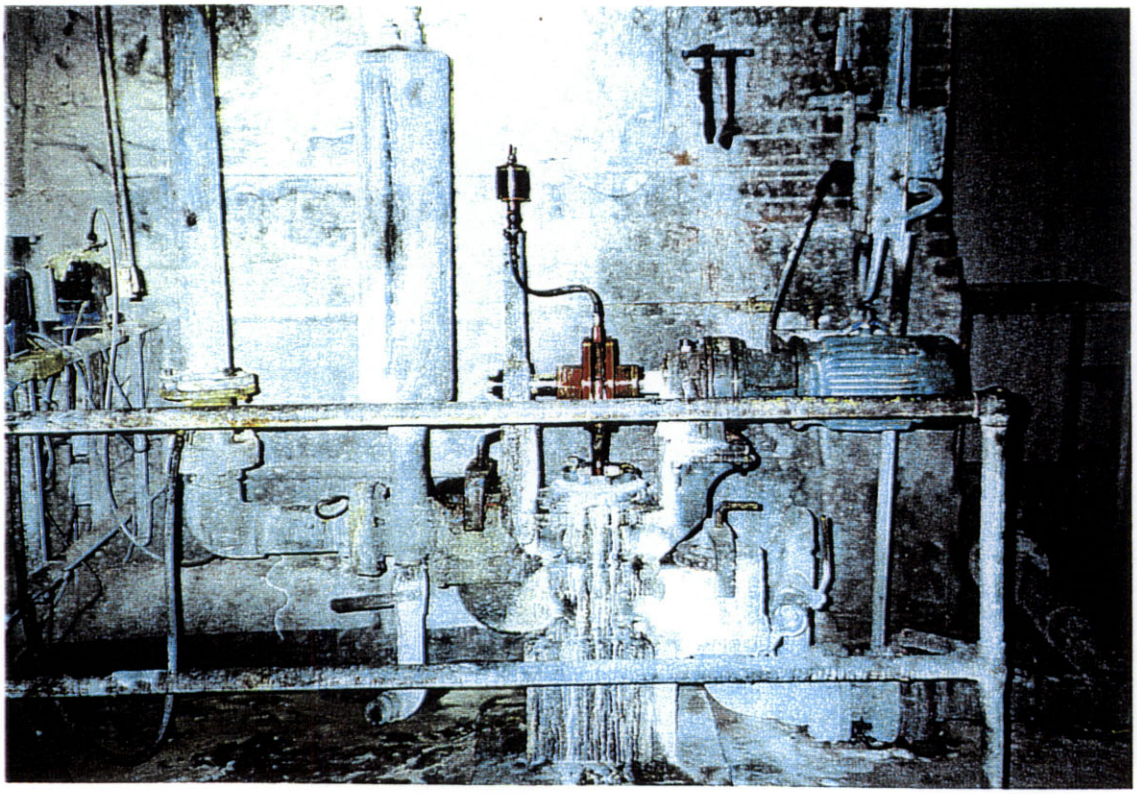
20,000 GALLON WASTEWATER TANK ON 3RD FLOOR



WASTEWATER TANK SUMP ON 4TH FLOOR

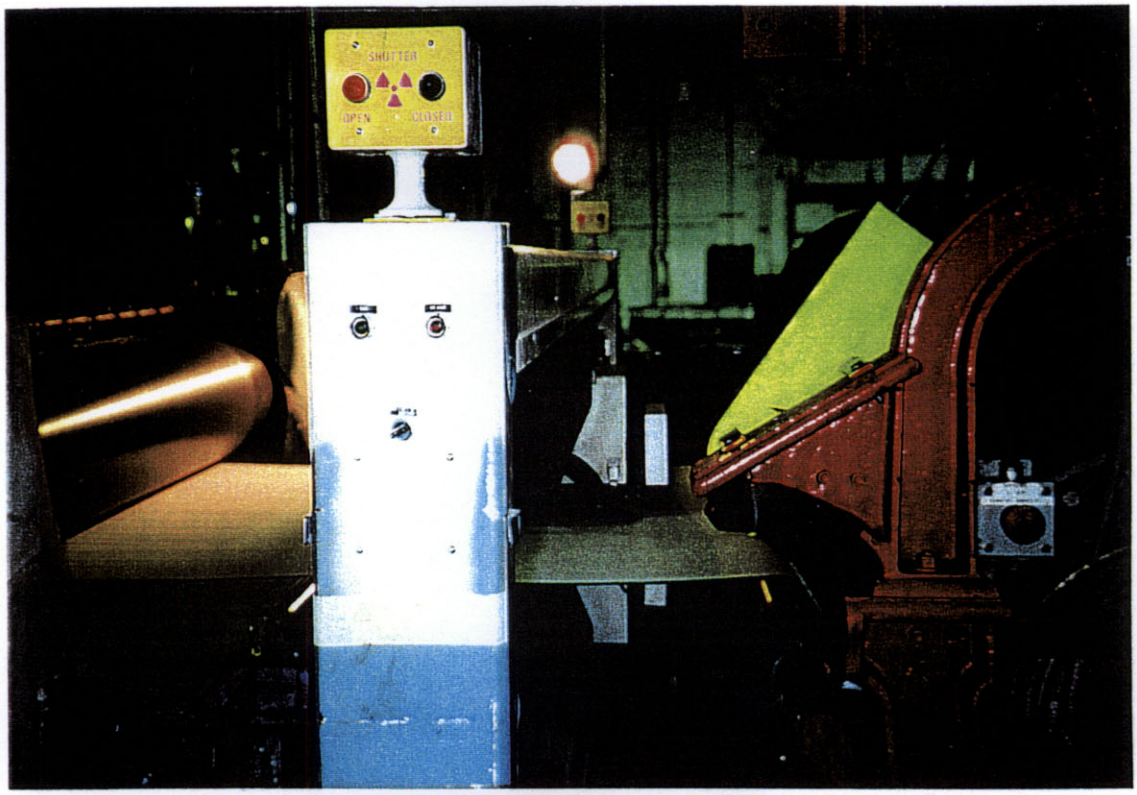


WASTEWATER PUMPS

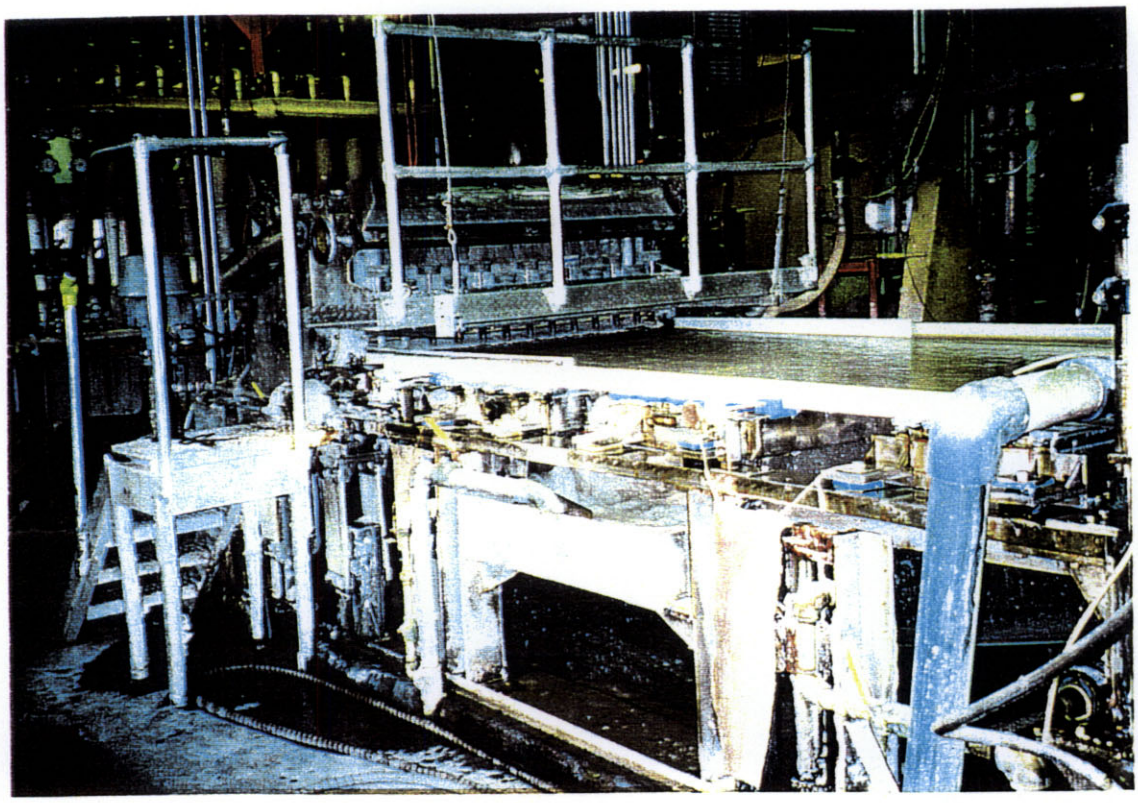


WASTEWATER PUMP ON 3RD FLOOR

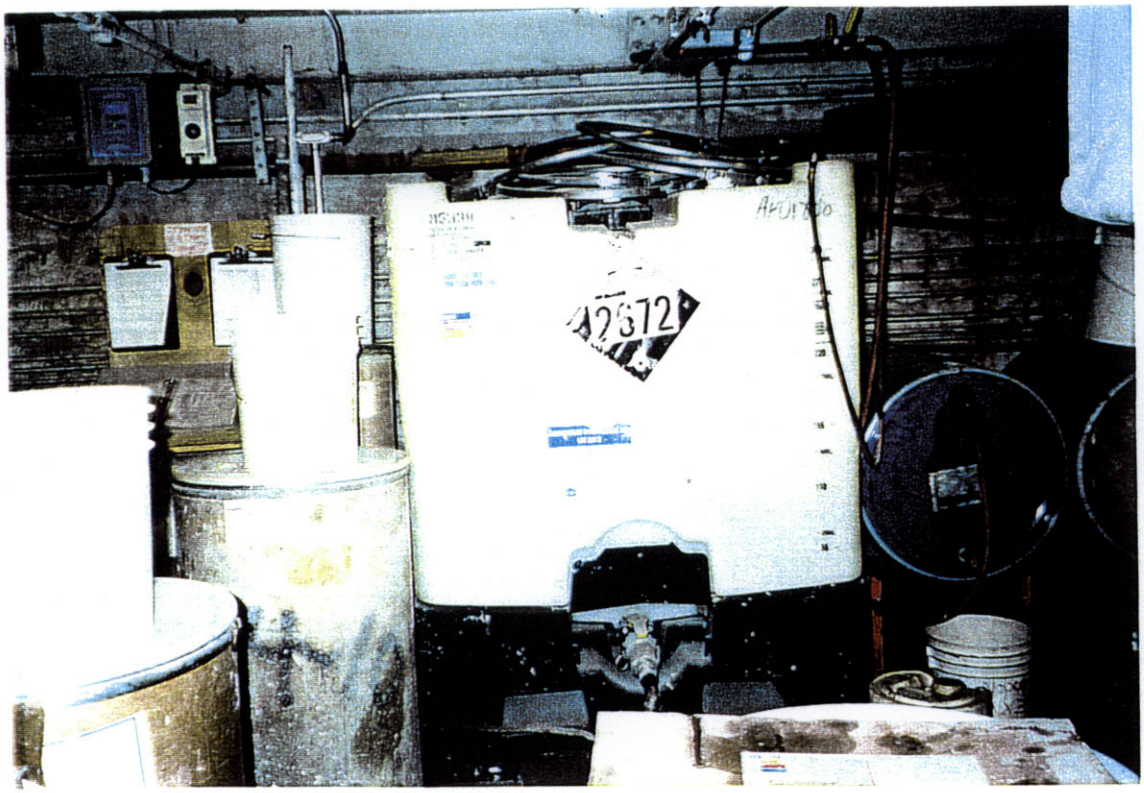
RADIATION GAGE



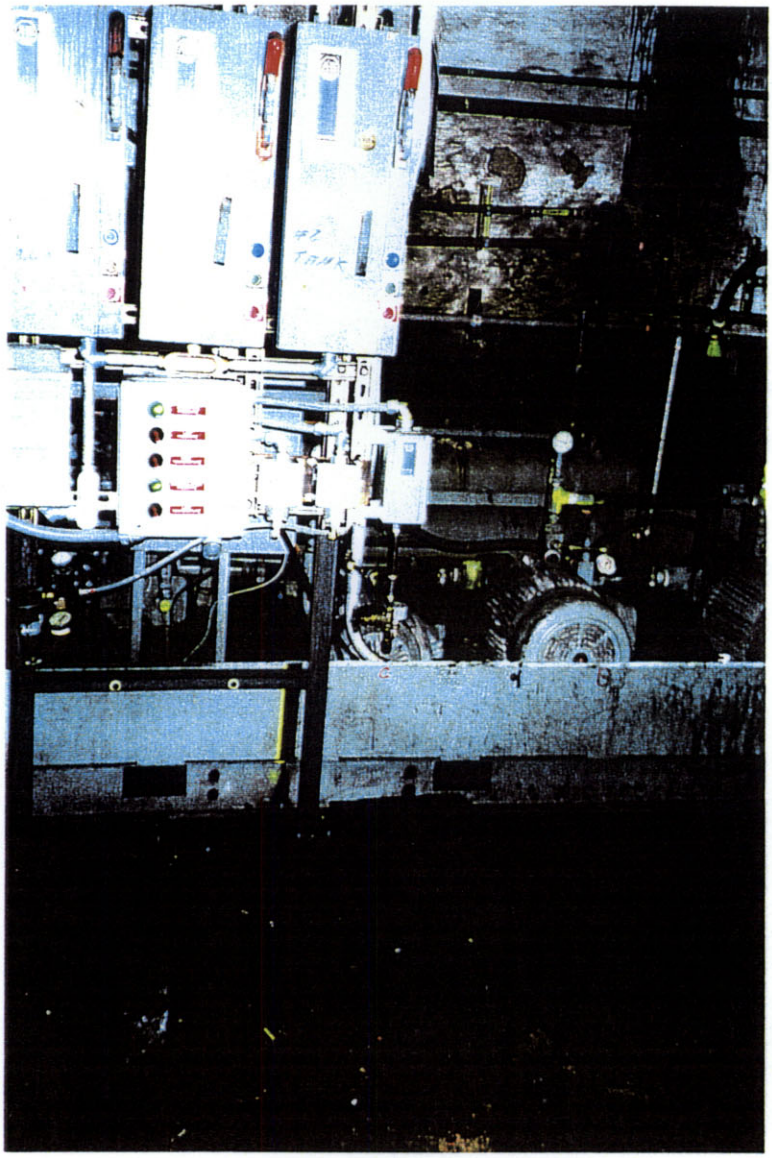
TRANSITE ON DRYER



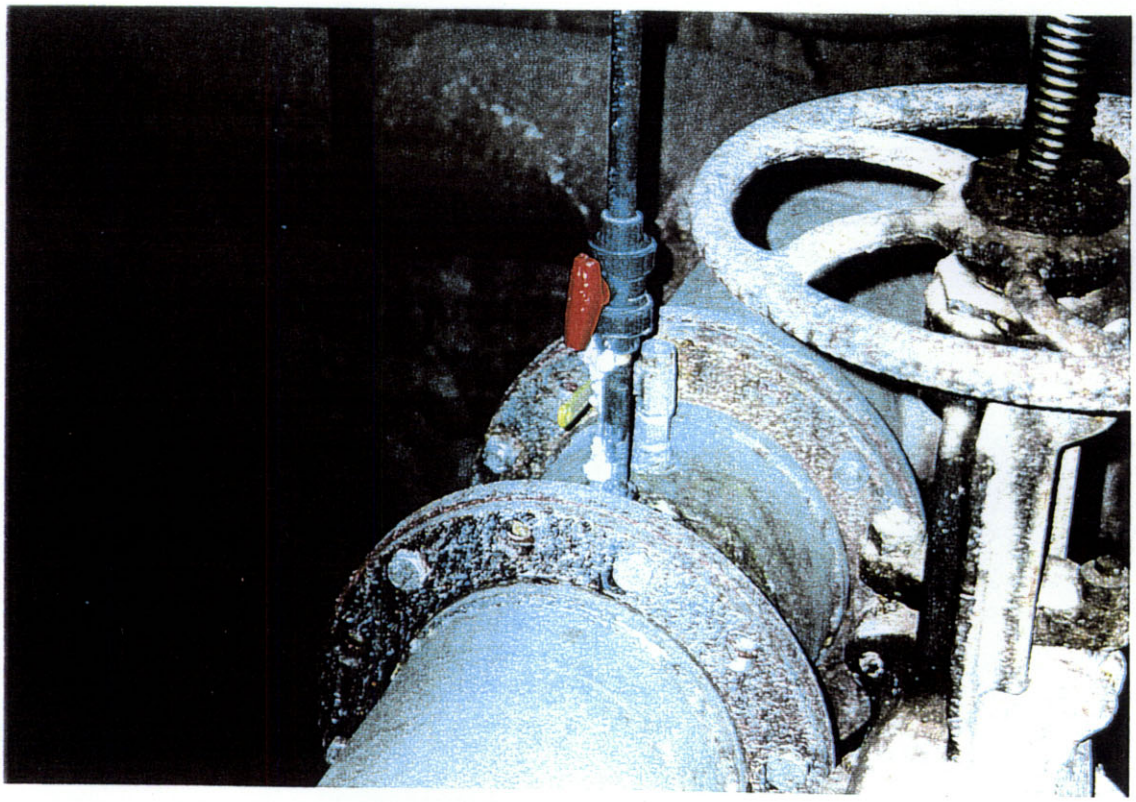
PAPER MACHINE



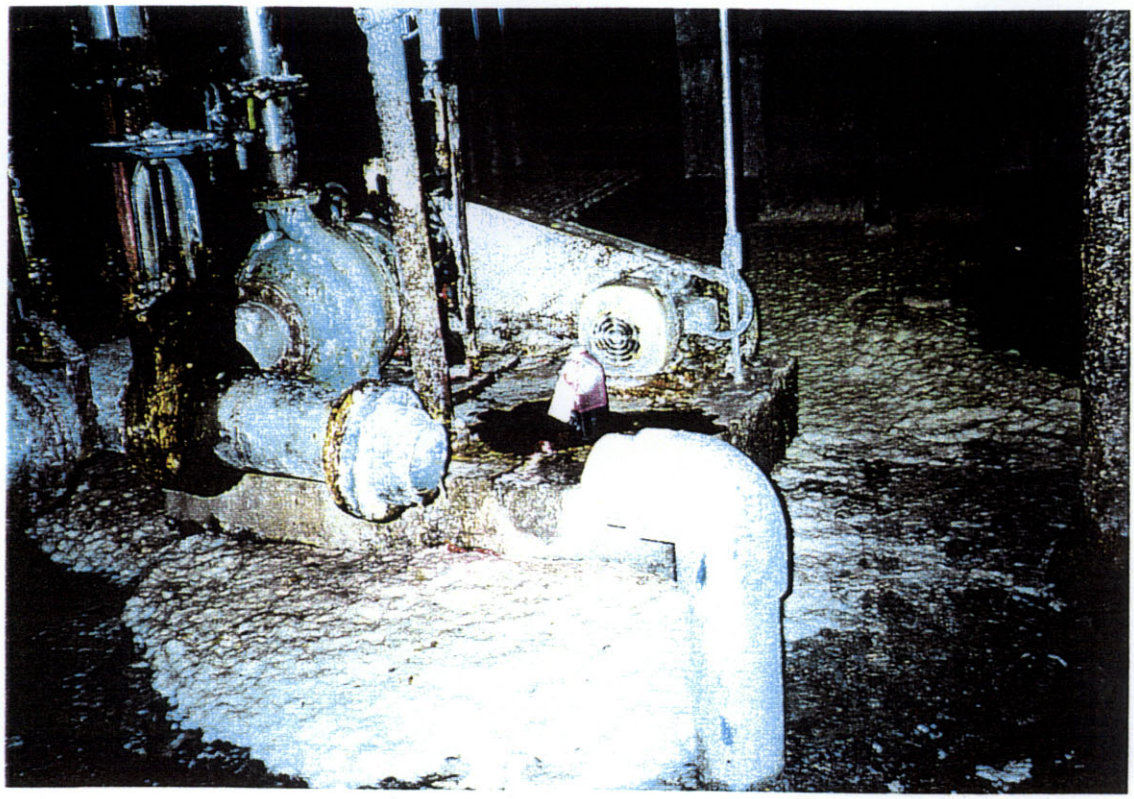
STORAGE ON FIRST FLOOR



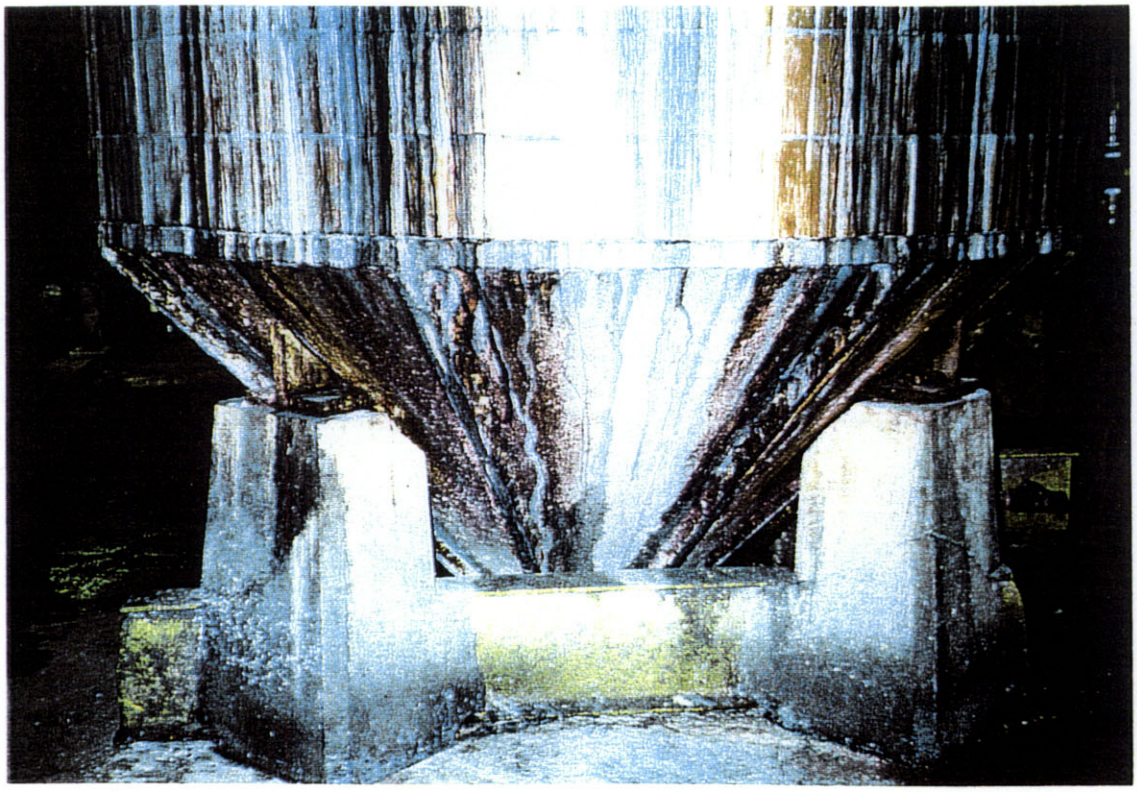
AUTOMATIC OILING SYSTEM – 2ND FLOOR



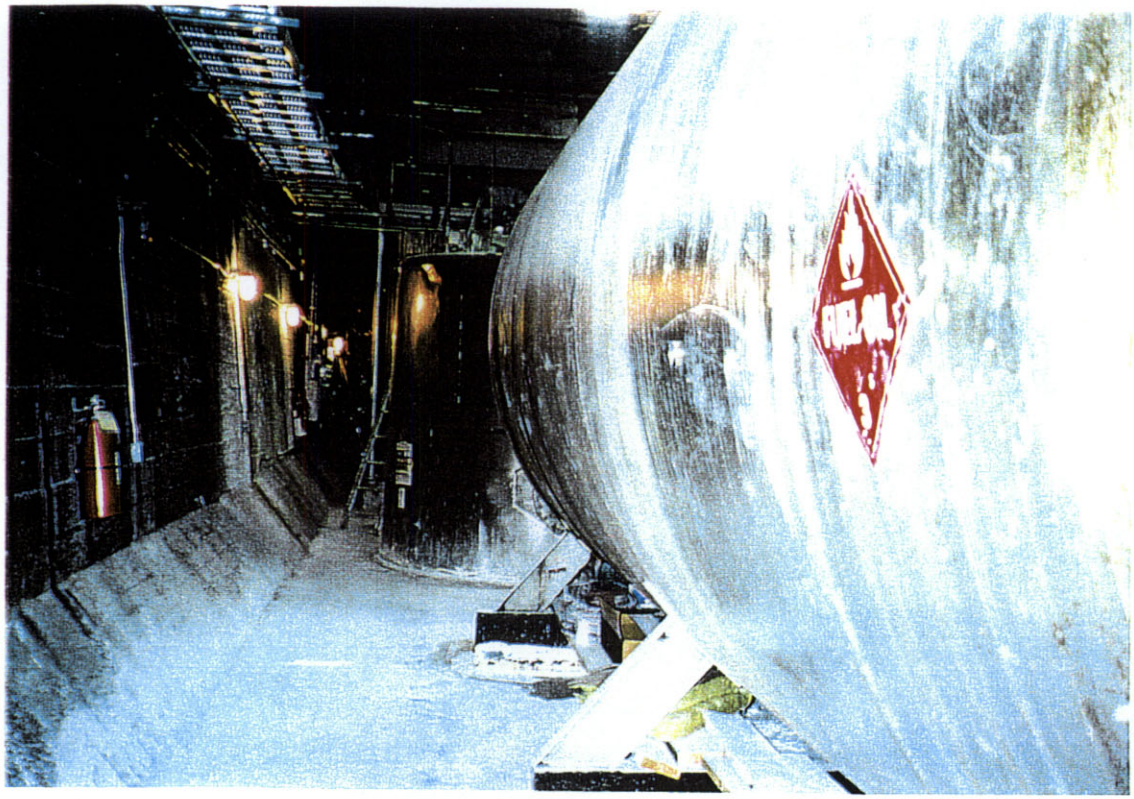
CHLORINE ADDITION LINE



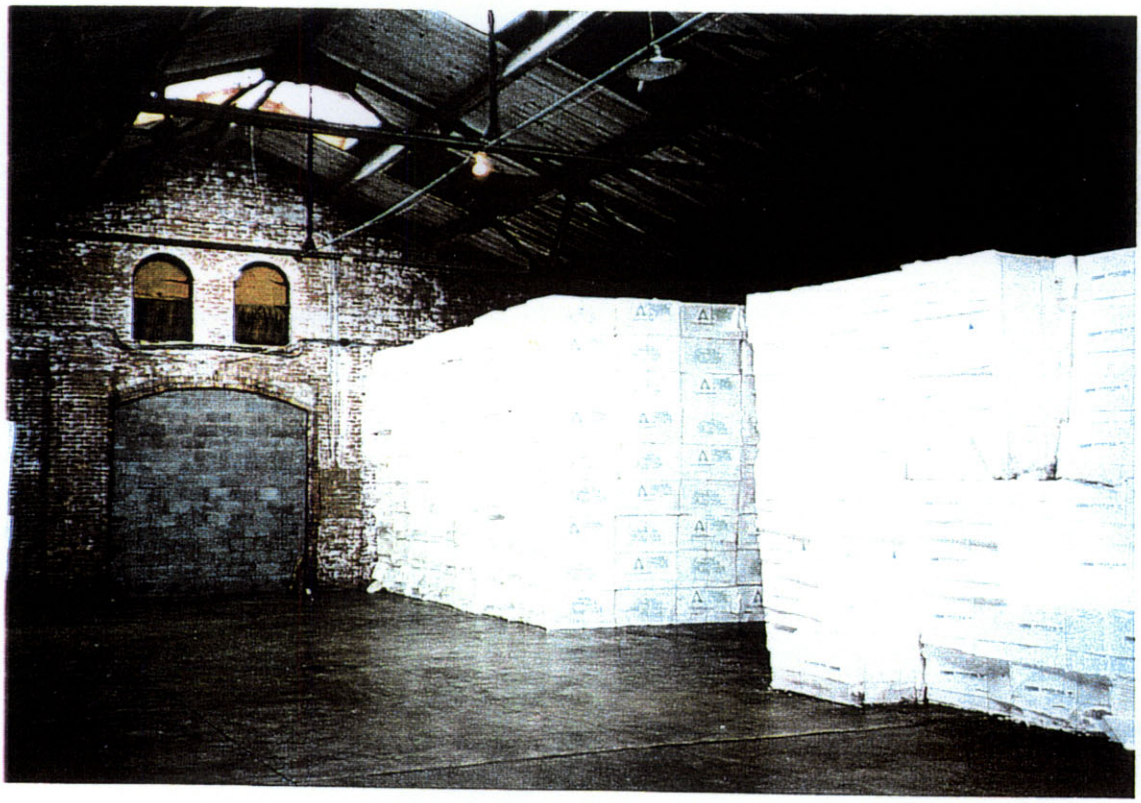
WASTEWATER TREATMENT AREA -3RD FLOOR



COLORANT TANK - 2ND FLOOR



18,000 GALLON FUEL OIL TANK



CLEAVES WAREHOUSE