



DEPARTMENT OF THE ARMY
Headquarters, U.S. Army Garrison Fort Monmouth
Fort Monmouth, New Jersey 07703 - 5101



REPLY TO
ATTENTION OF

Directorate of Public Works

November 13, 1997

U.S. Environmental Protection Agency, Region II
Pesticides and Toxic Substances Branch
Attn: Mr. David Greenlaw
2890 Woodbridge Avenue (MS-105)
Edison, NJ 08837

RE: Unmanifested Waste Report

Dear Mr. Greenlaw:

This letter is being written to document our recent conversation regarding a waste disposal action involving oil based paints. The paints in question were manifested from our Camp Evans facility (USEPA ID # NJ3210020324) located in Wall Township. In accordance with 40 CFR Part 261, the waste paint was classified as an ignitable waste as defined by 40 CFR Part 261.21. On August 8, 1997, three 55 gallon drums of consolidated paint were manifested (NJ manifest # NJA2773593) to Advanced Environmental Technical Services' (AETS) Treatment, Storage and Disposal Facility located in Flanders, NJ. At the generator's request, AETS redirected the three drums to the Chemical Waste Management (CWM) Resource Recovery facility located in West Carrollton, Ohio. Once received at the CWM facility, the paint waste was to be fuel blended as part of its final treatment remedy.

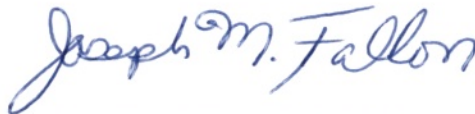
On September 13, 1997, I received a phone call from an AETS representative and at said time was informed that PCBs were identified in each of the three paint drums above 50 parts per million (ppm). I instructed AETS to have the three drums reshipped to their Flanders facility and from there to redirect the three drums to the CWM facility located in Port Arthur, Texas. The Port Arthur facility includes a TSCA permitted incinerator. The three drums are scheduled to depart the Flanders facility on November 14, 1997 and the shipment is scheduled to arrive at the Port Arthur facility during the week of November 17th, 1997. The drums will be listed on a Texas hazardous waste manifest (# 01094635) prior to their shipment to the Port Arthur facility. Following the incineration of said wastes, I will receive a certificate of destruction from CWM. The three drums will be referenced in our 1997 Annual PCB Document Log which will remain on file in Building 173.

As per our conversation, this is my first experience with finding PCBs in paints. I've been involved with managing hazardous and PCB wastes since my arrival at Fort Monmouth in September of 1988. During that time, PCBs were never identified as being a component of our paint waste. However, upon speaking with you, I did come to learn that the military, in some cases, did call for PCBs to be formulated into some paints and other commodities. As I explained on the phone, we are in the process of closing our Camp Evans facility. The Army commenced operations at the Evans facility in 1942. As part of the closure process, Directorate of Public Works personnel have been busy collecting unusable, out dated hazardous materials for proper disposal. A large percentage of these hazardous materials happen to be paint. Some of the paints are quite old and this probably accounts for the presence of the PCBs.

Having this new found knowledge regarding PCBs and paints, before we ship any waste paints, they will be sampled and tested for the presence of PCBs in our NJDEP certified laboratory. This management practice will prevent paints which contain PCBs at levels equal to or greater than 50 ppm from being shipped to a Non-TSCA facility.

Thank you for all the information which you conveyed to me during our conversation. Should you require any additional information regarding this subject or any other environmental issue at Fort Monmouth, please feel free to give me a call. I can be reached at (732)-532-6223.

Sincerely,

A handwritten signature in blue ink that reads "Joseph M. Fallon". The signature is written in a cursive, flowing style.

Joseph M. Fallon, CHMM
Environmental Protection Specialist
Directorate of Public Works

CF: Jeanette Dadusc, USEPA Region II
Peter Taylor, NJDEP



10/27/97

David Greenlaw
USEPA Region II
Pesticides and Toxic Substances Branch
2890 Woodbridge Avenue (MS-105)
Edison, NJ 08837

Re: Unmanifested Waste Report

Dear Mr. Greenlaw:

This report is being provided in accordance with 40 CFR 761.211 for an unmanifested shipment of TSCA waste received at the following facility:

Advanced Environmental Technical Services (AETS)
1 Eden Lane, Flanders, NJ 07836
NJD980536593

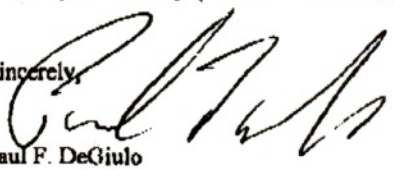
AETS operates a TSCA permitted facility for the commercial storage and consolidation of PCB wastes. In addition the facility is permitted by the NJDEP for the storage of hazardous wastes. Prior to acceptance, all wastes are certified by the generator as being properly characterized according to their hazards and classified in compliance with all applicable regulations. In accordance with the AETS facility waste analysis plan, all wastes upon receipt are evaluated for conformance with the certified waste profile. Following load consolidation at the AETS facility the wastes are then manifested off-site to an appropriate treatment or disposal facility with AETS as the generator. Upon receipt of the shipment at the destination disposal facility the waste is then analyzed in accordance with that site's waste analysis plan to determine if the waste is conforming.

As a result of a recent shipment AETS has been notified that certain wastes were non-conforming due to the presence of PCBs. Since it has been determined that AETS had originally received an unmanifested PCB shipment from the initial generator AETS is now submitting this report to the USEPA. The attached report details the specifics of the unmanifested PCB waste.

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I can not personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

Should you have any questions or need additional information please contact me at (201) 691-3930.

Sincerely,


Paul F. DeGiulio
Environmental, Health, and Safety Manager

cc. John Ruggero, USEPA Region III
Joe Fallon, US Army

TSCA Unmanifested Waste Report**Commercial TSCA Facility:**

Advanced Environmental Technical Services (NJD980536593)
1 Eden Lane, Flanders, NJ 07836

Generator Information:

Name: U.S. Army Com. Elec. Comd.
Address: Camp Evans Area, Fort Monmouth, NJ 07703
EPA ID #: NJ3210020324

Transporter Information:

Name: AETS
EPA ID #: NJD080631369

Shipping Information:

Manifest Number - NJA277593
Container Number - PF 18293 017, PF 18293 001, PF 18923 002
Date Received - 8/14/97

Waste Description:

Type: Oil based paint
Quantity: Two 85 gallon drums, one 55 gallon drum.
PCB Concentration: 50.29, 1903.75, and 415.6

Explanation for Unmanifested PCBs:

Generator was unaware that PCBs were present in the wastestream.

Disposition of the Unmanifested PCBs: All three drums are in storage pending scheduling and shipment to CWM Port Arthur, TX for incineration.

State of New Jersey
Department of Environmental Protection
Hazardous Waste Regulation Division
Manifest Section
C-421, Trenton, NJ 08646-0001



U. S. ARMY COM ELEC COMD

CAMP EVANS AREA, J. SHIRGHIO
ATTN:SELM-PW-EV
FORT MONMOUTH NJ 07703

NJA 2773593

908 532-6223

SAME
NJDEP50160-83465-PAAH0500

ADVANCED ENVIR TECH SRVS(AETS)

N J D 0 8 0 6 3 1 3 6 9

201 347-7111

ADVANCED ENVIRONMENTAL TECHNICAL SERVICES

1 EDEN LANE

FLANDERS, NJ 07836

N J D 9 8 0 5 3 6 5 9 3

N/A
201 347-1909

WASTE AEROSOLS, FLAMMABLE.

X (EACH NOT EXCEEDING 1 L CAPACITY) 2.1,UN1950 002 DF 00035 P D001

WASTE FLAMMABLE LIQUIDS, n.o.s.

X 3,UN1993,II 005 DF 00295 P D001

WASTE FLAMMABLE LIQUIDS, n.o.s.

X 3,UN1993,II 002 DF 00100 P D001

WASTE FLAMMABLE LIQUIDS, n.o.s.

X 3,UN1993,II 001 DF 00060 P F003

Additional Descriptions for Materials Listed Above

L/I AEROSOLS (D007)

L/I PLC

501 501

L/I PLC

L/I PLC

501 501

PACKING SLIPS ATTACHED FOR CLARIFICATION

EMERGENCY PHONE 888 353-2387

Shipment Transferred to T35420(NJ), NJ Dept / #83424 on 8/8/97

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this container are as accurately described as possible, and that the contents are properly classified, packed, marked, and labeled, and are in accordance with the requirements of the Hazardous Waste Manifest Regulations.

I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated and that 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, I am a small quantity generator, I have made a good faith effort to minimize waste generation and select the best waste management method that is available to me.

Printed/Typed Name

Jodie Stein for Joe Falko

Signature

Jodie Stein for Joe Falko

Month Day Year

08 08 97

17. Transporter's Acknowledgment or Receipt of Materials

Printed/Typed Name

John R Woloson

Signature

John R Wolo

Month Day Year

08 08 97

18. Transporter's Acknowledgment or Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Box

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

Printed/Typed Name

MATTHEW COLE

Signature

Matthew Cole

Month Day Year

08 14 97

UNIFORM HAZARDOUS
WASTE MANIFESTATION
CONTINUATION SHEET

NJ3210020324

18293 2 of 4

U. S. ARMY COM ELEC COMD

CAMP EVANS AREA, J. SHIRGHIO

ATTN:SELF-PW-EV

NJA2773593

(908) 532-6223

FORT MONMOUTH, NJ 07703

SAME

ADVANCED ENVIR TECH SRVS(AETS)

NJD080631369

NJDEP50160-83465-PAAH0500
201 347-7111

X	WASTE FLAMMABLE LIQUIDS, n.o.s. 3,UN1993,II	001	DF	00045	P	D001
X	RQ WASTE PAINT INCLUDING PAINT, LACQUER, ENAMEL, STAIN, SHELLAC SOLUTIONS, VARNISH, POLISH, 3,UN1263,II (D001)	001	DM	00300	P	D001
X	RQ WASTE FLAMMABLE LIQUIDS, n.o.s. (PAINT) 3,UN1993,II (D001)	003	DM	01200	P	F005
X	WASTE MAGNESIUM WITH MORE THAN 50% MAGNESIUM IN PELLETS, TURNINGS, OR RIBBONS 4.1,UN1869,III	001	DF	00015	P	D001
X	WASTE OXIDIZING SOLID, n.o.s. 5.1,UN1479,II	001	DF	00060	P	D001
X	WASTE TOXIC LIQUIDS, OXIDIZING, n.o.s. (SODIUM DICHROMATE) 6.1,UN3122,II	001	DF	00060	P	D001
X	WASTE TOXIC, LIQUIDS, ORGANIC, n.o.s. (1,1,1 TRICHLOROETHANE, METHYLENE CHLORIDE) 6.1,UN2810,III	002	DF	00105	P	F002
X	WASTE CORROSIVE LIQUID,ACIDIC,INORGANIC,n.o.s 8,UN3264,II	001	DF	00060	P	D002
X	RQ ASBESTOS 9,NA2212,III	001	DM	00400	P	X910

S. Additional Descriptions for Materials Listed Above:
A)L/I PLC B)L/I PAINT CANS C)L/I, T OIL BASED PAINT (D001)
D)S/I PLC (D003) E)S/I PLC F)L/I PLC (D007) G)L/T PLC
H)L/C PLC I)S/- ASBESTOS

Packing Code for AETS

AETS A-I S01
MAD 8/14/97

32. Special Handling Instructions and Appoint Information

PACKING SLIPS ATTACHED FOR CLARIFICATION

EMERGENCY PHONE 888 353-2387

33. Transporter Acknowledgement Receipt of Material

Printed/Typed Name

John R Wolosan

Signature

John R Wolosan

08 08 97

34. Transporter Acknowledgement Receipt of Material

Printed/Typed Name

Signature

35. Discrepancy Indication Space

NJ3210020324

18293

3 of 4

U. S. ARMY COM ELEC COMD

CAMP EVANS AREA, J. SHIRGHIO

ATTN:SELM-PW-EV

FORT MONMOUTH, NJ 07703

NJ A2773593

(908) 532-6223

SAME

ADVANCED ENVIR TECH SRVS(AETS)

NJDO80631369

NJDEP50160-83465-PAAH0500
201 347-7111

WASTE PAINT

X COMBUSTIBLE LIQUID, UN1263, III 001 DF 00035 P D001

RQ WASTE COMBUSTIBLE LIQUID, n.o.s.

X COMBUSTIBLE LIQUID, NA1993, III (U051) 001 DF 00010 P U051

CHEMICALS, n.o.s.

(FLOOR WAX) DOT NON-REGULATED, NONE 001 DF 00040 P ID72

CHEMICALS, n.o.s.

(CUTTING OIL) DOT NON-REGULATED, NONE 001 DF 00060 P X910

CHEMICALS, n.o.s.

(GREASE) DOT NON-REGULATED, NONE 001 DF 00060 P X910

CHEMICALS, n.o.s.

(OIL SPILL CLEAN-UP) DOT NON-REGULATED, NONE 001 DM 00500 P X910

CHEMICALS, n.o.s.

DOT NON-REGULATED, NONE 002 DF 00050 P X910

CHEMICALS, n.o.s.

(BORON OXIDE) DOT NON-REGULATED, NONE 001 DF 00040 P X910

CHEMICALS, n.o.s.

(SILICA) DOT NON-REGULATED, NONE 001 DF 00060 P X910

S. Additional Descriptions for Materials Listed Above

A) L/I PLC B) L/T PLC C) L/- PLC D) L/- PLC E) L/- PLC

F) S/- OIL SPILL CLEAN-UP. G) S/- PLC H) S/- PLC

I) S/- PLC

Handing Codes for Waste

AETS A-I S01

Material 8/14/97

Special Handling, Remarks, and Additional Information

PACKING SLIPS ATTACHED FOR CLARIFICATION

EMERGENCY PHONE 888 353-2387

33. Transporter

Printed/Typed Name

John R Woloson

Signature

John R Woloson

08 08 97

34. Transporter

Printed/Typed Name

Signature

35. Discrepancy Indication Space

UNIFORM HAZARDOUS
WASTE MANIFEST
Continuation of

NJ3210020324

18293

4 of 4

U. S. ARMY COM ELEC COMD

CAMP EVANS AREA, J. SHIRGHIO

ATTN:SELM-PW-EV

FORT MONMOUTH, NJ 07703

NJA2773593

(908) 532-6223

SAME

ADVANCED ENVIR TECH SRVS(AETS)

NJD080631369

NJDEP50160-83465-PAAH0500

201 347-7111

CHEMICALS, n.o.s.

(SANDING GRIT) DOT NON-REGULATED,NONE

001

DF

00040

P

X910

X follow sheet for per turner

Additional Description: Details Listed Above

A/S/- PLC

Handling Code: 11

AETS A-501
MWR 8/14/97

Special Handling: Packing Slips Attached for Clarification

EMERGENCY PHONE 888 353-2387

Transporter: Knowledge of Recipient Material

Printed/Typed Name:

John RWolason

Signature:

John RWolason

08 08 97

Transporter: Knowledge of Recipient Material

Printed/Typed Name:

35. Discrepancy Indication Space



State of New Jersey
Department of Environmental Protection
Hazardous Waste Regulation Program
Manifest Section
CN 421, Trenton, NJ 08625-0421



2 7 6 8 0 2 1

9-3-97

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

Form Approved. OMB No. 2050-0039. Expires 9-30-97

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	2. Page 1 of 4	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address ADVANCED ENVIRONMENTAL TECHNICAL SERVICES 1 EDEN LANE, FLANDERS, NJ 07936		4. Generator's Phone (201) 347-1929	A. State Manifest Document Number NJA 2768021		B. State Generator's ID (Gen. Site Address) SAME
5. Transporter 1 Company Name ADVANCED ENVIR TECH SRVS (AETS)		6. US EPA ID Number NJ00000000000000000000	C. State Trans. ID-NUDEP NJDEP50160-83445		D. Transporter's Phone (201) 347-7111
7. Transporter 2 Company Name ADVANCED ENVIR. TECH. SRVS. (AETS)		8. US EPA ID Number NJ00000000000000000000	E. State Trans. ID-NUDEP NJDEP50160-83451		F. Decal No. 8174571
9. Designated Facility Name and Site Address OWM RESOURCE RECOVERY 4301 INFIRMARY ROAD WEST CARROLLTON OH 45449		10. US EPA ID Number OH00000000000000000000	G. Facility's ID OH00000000000000000000		H. Facility's Phone (518) 859-6181
11. US DOT Description (Including Proper Shipping Name, Hazard Class or Division, ID Number and Packing Group)		12. Containers	13. Total Quantity	14. Unit	15. Waste No.
a. X WASTE FLAMMABLE LIQUIDS, n.o.s. (ACETONE, METHYL ALCOHOL) 3, UN1993, II		213 DM	20400	P	F203
b. X RG WASTE FLAMMABLE LIQUIDS, n.o.s. (KEROSENE OIL) 3, UN1993, II (2001)		207 DM	21642	P	D001
c. X RG WASTE FLAMMABLE LIQUIDS, n.o.s. (ISOPROPANOL) 3, UN1993, II (2001)		201 DM	20420	P	D001
d. X RG WASTE FLAMMABLE LIQUIDS, n.o.s. (ISOPROPYL ALCOHOL) 3, UN1993, II (2001)		201 DM	20420	P	D001
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above			
a. L/I MIXED SOLVENTS		c. L/I MIXED SOLVENTS		a. T510 c. T510	
b. L/I MIXED SOLVENTS		d. L/I MIXED SOLVENTS		b. T510 d. T510	
15. Special Handling Instructions and Additional Information 3-2)BA6223; LINE A ALSO 2001		EMERGENCY CONTACT 1-822-357-2357			
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. 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 Jennifer Fletcher		Signature Jennifer Fletcher		Month Day Year 08/28/97	
17. Transporter 1 Acknowledgement of Receipt of Materials					
Printed/Typed Name Jennifer Fletcher		Signature Jennifer Fletcher		Month Day Year 08/28/97	
18. Transporter 2 Acknowledgement of Receipt of Materials					
Printed/Typed Name Thomas D. Rosevear		Signature Thomas D. Rosevear		Month Day Year 11/01/97	
19. Discrepancy Indication Space Reject 3 drums page 2 line item F. Back to generator, VIA Transporter #2. TSCA regulated material contains POLYCHLORINATED BIPHENYLS greater than 50PPM. OUT OF SERVICE: See PCB continuation sheet. Unique ID & container # See PCB continuation sheet. Weight: See PCB sheet.					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name Carol Lee Moody		Signature Carol Lee Moody		Month Day Year 08/29/97	

NJA 2768021

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator's US EPA ID No. NJD980536593		Manifest Document No. NJ 45774		22. Page 2 of 4		Information in the shaded areas is not required by Federal law.	
23. Generator's Name: ADVANCED ENVIRONMENTAL TECHNICAL SERVICES 1 EDEN LANE, FLANDERS, NJ 07836 (201) 347-1909						L. State Manifest Document Number: NJA2768021			
24. Transporter 1 Company Name ADVANCED ENVIR TECH SRVS(AETS)						25. US EPA ID Number NJD080631369			
26. Transporter 2 Company Name ADVANCED ENVIR. TECH. SRVS. (AETS)						27. US EPA ID Number NJD080631369			
28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						N. State Trans ID NJDEP50160-83445		O. Trans. Phone (201) 347-7111	
29. Containers						30. Total Quantity		31. Unit Mt/Vol	
a. ☒ RQ WASTE FLAMMABLE LIQUIDS, n.o.s. (MINERAL SPIRITS) 3, UN1993, II (D001)						001 DM 00350		P D001	
b. ☒ RQ WASTE FLAMMABLE LIQUIDS, n.o.s. (STODDARD SOLVENT) 3, UN1993, II (D001)						007 DM 02450		P D001	
c. ☒ RQ WASTE FLAMMABLE LIQUIDS, n.o.s. (METHANOL) (ACETONITRILE) 3, UN1993, II (D001)						006 DM 02400		P F003	
d. ☒ RQ WASTE FLAMMABLE LIQUIDS, n.o.s. (METHANOL) (ACETONITRILE) 3, UN1993, II (D001)						001 DM 00300		P F003	
e. ☒ RQ WASTE FLAMMABLE LIQUIDS, n.o.s. (ACETONE, TOLUENE) 3, UN1993, II (F003, F005, D001)						001 DM 00400		P F003	
f. ☒ RQ WASTE FLAMMABLE LIQUIDS, n.o.s. (PAINT) 3, UN1993, II (D001)						003 DM 01200		P F005	
g. ☒ RQ WASTE PAINT 3, UN1263, II (D001)						002 DM 01000		P D001	
h. ☒ RQ WASTE FLAMMABLE LIQUIDS, TOXIC, n.o.s. (METHANOL) (CHLOROFORM) 3, UN1992, II (D001)						002 DM 00480		P F003	
i. ☒ FORMALDEHYDE, SOLUTIONS 8, UN2209, III						002 DF 00390		P ID72	
S. Additional Descriptions for Materials Listed Above A-C) L/I MIXED SOLVENTS D-F) L/IT MIXED SOLVENTS G) L/I H) L/IT MIXED SOLVENTS I) L/-						T. Handling Codes for Wastes Listed Above A-I = T50			
32. Special Handling Instructions and Additional Information HAZARDING SLIPS ATTACHED FOR CLARIFICATION A-E) BA6220 F) BY8059 G) BA6620 H) BY8060 I) AA9782; *ID72 REGULATED BY NJDEPE ONLY LINE C ALSO D001; LINE D F005, D001; LINE E F005, D001; LINE F D001; LINE H D038, F005, F002, D001 EMERGENCY CONTACT 1-888-353-2387									
33. Transporter 1 Acknowledgement of Receipt of Materials								Date	
Printed/Typed Name Jennifer Fletcher				Signature Jennifer Fletcher				Month Day Year 08/28/97	
34. Transporter 2 Acknowledgement of Receipt of Materials								Date	
Printed/Typed Name Thomas P. Rosevear				Signature Thomas P. Rosevear				Month Day Year 10/06/97	
35. Discrepancy Indication Space AETS RECEIVED 3 DKUM FROM LINE 28 F 10/7/97									

9-3-97

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator's US EPA ID No. NJD980536593		Manifest Document No. NJ 45774		22. Page 4 of 4		Information in the shaded areas is not required by Federal law.	
23. Generator's Name ADVANCED ENVIRONMENTAL TECHNICAL SERVICES 1 EDEN LANE, FLANDERS, NJ 07836 (201) 347-1989						State Manifest Document Number NJA2768021			
24. Transporter 1 Company Name ADVANCED ENVIR TECH SRVS (AETS)						25. US EPA ID Number NJD080631369			
26. Transporter 2 Company Name ADVANCED ENVIR TECH SRVS (AETS)						27. US EPA ID Number NJD080631369			
28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						29. Containers			
						30. Total Quantity		31. Unit Wt/Vol	
						32. Waste No.			
a. CHEMICALS, n.o.s. DOT NON-REGULATED, NONE						001 DF 00400		P ID72	
b. CHEMICALS, n.o.s. DOT NON-REGULATED, NONE						002 DM 00800		P ID72	
c. CHEMICALS, n.o.s. DOT NON-REGULATED, NONE						003 DM 01480		P ID72	
d. CHEMICALS, n.o.s. DOT NON-REGULATED, NONE						013 DM 04470		P ID72	
e. NON-RCRA LIQUID, n.o.s. DOT NON-REGULATED, NONE						001 DM 00400		P ID72	
f. OIL, n.o.s. DOT NON-REGULATED, NONE						003 DM 01200		P ID72	
g. STATE HAZARDOUS LIQUID, n.o.s. DOT NON-REGULATED, NONE						007 DM 03220		P ID72	
h.									
i.									
S. Additional Descriptions for Materials Listed Above A) L/- MIXED OIL B) L/- NONHAZ LEAN WATER C-G) L/- MIXED OIL						T. Handling Codes for Wastes Listed Above A-G-T50			
32. Special Handling Instructions and Additional Information A) K32371 B) A17050 C) K32370 D) K32371 E, F) K32370 G) K32371; *ID72 REGULATED BY NJDEPE ONLY						EMERGENCY CONTACT 1-888-353-2387			
33. Transporter 1 Acknowledgement of Receipt of Materials						Date			
Printed/Typed Name Jennifer Fletcher						Signature Jennifer Fletcher		Month Day Year 08/20/97	
34. Transporter 2 Acknowledgement of Receipt of Materials						Date			
Printed/Typed Name Thomas D. Rosevear						Signature Thomas D. Rosevear		Month Day Year 10/06/97	
35. Discrepancy Indication Space									

3. CODES WITH SUBCATEGORIES (place appropriate letter from section 9 before each code that applies) (See 40 CFR 268 for details)

☒ D001 HI-TOC	☐ D003 Unexp. Ord. Emg.	☐ K006 Hydrated	☐ P047 Salts	☐ P092 HI Inc./RMERC Res.
☐ D001 < 10% TOC-CWA	☐ D003 Other Reactives	☐ K006 Anhydrous	☐ P047 Nonsalts	☐ U151 Lo RMERC Res.
☐ D001 < 10% TOC-Non/CWA	☐ D006 Batteries	☐ K069 Calcium Sulfate	☐ P065 Lo Inc. Res.	☐ U151 Lo Not RMERC Res.
☐ D002 Non-CWA	☐ D006 Lead acid batteries	☐ K069 Not Calcium Sulfate	☐ P065 Lo RMERC Res.	☐ U151 HI Hg
☐ D002 CWA	☐ D009 Organic Hg > 260ppm	☐ K071 Rmerc Res.	☐ P065 Not Inc./RMERC Res.	☐ U240 2, 4 D
☐ D003 Reactive Cyanide	☐ D009 Inorg. Hg > 260	☐ K071 Not Rmerc Res.	☐ P065 HI Inc./RMERC Res.	☐ U240 2, 4 esters & Salts
☐ D003 Reactive Sulfide	☐ D009 Hg < 260	☐ K106 Lo Rmerc Res.	☐ P092 Lo Inc. Res.	
☐ D003 Explosive	☐ F025 Light ends	☐ K106 Not Rmerc Res.	☐ P092 Lo RMERC Res.	
☐ D003 Water Reactives	☐ F025 Spent filter	☐ K106 > 260 ppm Hg	☐ P092 Not Inc./RMERC Res.	

The subcategory for D018-D043 waste is "treated in nonCWA/nonSDWA facility" unless the following box is checked: ☐ "treated in CWA/SDWA facility"

4. COMMON CODES (Place appropriate letter from section 9 before each code that applies)

☐ D004	☐ D005	☒ D006	☐ D007	☒ D008	☐ D009	☐ D010	☐ D011	☐ D012	☐ D013	☐ D014	☐ D015	☐ D016	☐ D017	☐ D018	☐ D019
☐ D020	☐ D021	☒ D022	☒ D023	☐ D024	☐ D025	☐ D026	☐ D027	☐ D028	☐ D029	☐ D030	☐ D031	☐ D032	☐ D033	☐ D034	☐ D035
☐ D036	☐ D037	☒ D038	☒ D039	☐ D040	☐ D041	☐ D042	☐ D043	☒ F001	☒ F002	☒ F003	☐ F004	☒ F005	☐ F006	☐ F007	☐ F008
☐ U007	☐ U044	☐ U061	☐ U072	☐ U080	☐ U108	☐ U117	☐ U122	☐ U123	☐ U136	☐ U154	☐ U188	☐ U213	☐ U220	☐ U226	☐ U279
☐ P012	☐ P030	☐ P051	☐ P098	☐ P105	☐ P205	☐ F006	☐ F007	☐ F008	☐ F009	☐ F010	☐ F011	☐ F012	☐ F019	☐ F039	☐ K061

ADDITIONAL CODES (Enter all codes not identified above which are associated with waste)

5. USEPA HAZARDOUS WASTE CODE(S)	6. TREATMENT STANDARDS FOR NON-PHASE II STATES (INDICATE THE APPLICABLE TREATMENT STANDARD 268.41, 268.43 OR SPECIFIED TECHNOLOGY BELOW)	7. HOW MUST THE WASTE BE MANAGED? ENTER THE LETTER FROM BELOW

To identify F039, or UHCs managed in non-CWA, use the "F039/Underlying Hazardous Constituents Form" provided (CWM-2004) and check here: ☐
If no UHCs are present upon generation check here: ☒ Check here if disposal facility will check for all UHCs (i.e. no UHC form required)
To list additional EPA waste code(s), use the supplemental sheet and check here: ☐ In lieu of supplemental sheet you may use multiple copies of this form.

8. SOLVENT CONSTITUENTS (F001 - F005) Check here if disposal facility will check for all spent solvents

☒ Acetone	☐ Benzene	☐ n-Butyl alcohol	☐ Carbon disulfide
☐ Carbon Tetrachloride	☐ Chlorobenzene	☐ O-Cresol	☒ Cresols (m&p)
☐ Cyclohexanone	☐ o-Dichlorobenzene	☐ 2-Ethoxyethanol	☒ Ethyl acetate
☒ Ethyl benzene	☐ Ethyl ether	☐ Isobutanol	☒ Methanol
☒ Methylene chloride	☒ Methyl ethyl ketone	☐ Methyl isobutyl ketone	☒ Nitrobenzene
☒ 2-Nitropropane	☐ Pyridine	☒ Tetrachloroethylene	☒ Toluene
☒ 1,1,1 Trichloroethane	☒ 1, 1, 2-Trichloroethane	☐ 1, 1, 2-Trichloro, 1, 2, 2-trifluoroethane	☐ Trichloroethylene
☐ Trichloromonofluoromethane	☒ Xylenes		

9. (States authorized by EPA to manage the LDR program may have regulatory citations different from the 40 CFR citations listed below. Where these regulatory citations differ, your certification will be deemed to refer to those state citations instead of the 40 CFR citations.)

A. Or ☒ **RESTRICTED WASTE REQUIRES TREATMENT**
This waste must be treated to the applicable treatment standards set forth in 40 CFR Part 268 Subpart D, 268.32, or RCRA Section 3004(d)
☐ For Hazardous Debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR Part 268.45."

B.1 **RESTRICTED WASTE TREATMENT TO PERFORMANCE STANDARDS**
"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the performance levels specified in 40 CFR Part 268, Subpart D, and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d) without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

B.2 **RESTRICTED WASTES FOR WHICH THE TREATMENT STANDARD IS EXPRESSED AS A SPECIFIED TECHNOLOGY (AND THE WASTE HAS BEEN TREATED BY THAT TECHNOLOGY)**
"I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.42. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

B.3 **GOOD FAITH AND ANALYTICAL CERTIFICATION - FOR INCINERATED ORGANICS**
"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the nonwastewater organic constituents have been treated by incineration in units operated in accordance with 40 CFR Part 264, Subpart O, or 40 CFR Part 265, Subpart O, or by combustion in fuel substitution units operating in accordance with applicable technical requirements, and I have been unable to detect the nonwastewater organic constituents despite having used best good faith efforts to analyze for such constituents. I am aware that there are a significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

B.4 **DECHARACTERIZED WASTE REQUIRES TREATMENT FOR UNDERLYING HAZARDOUS CONSTITUENTS**
"I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 to remove the hazardous characteristic. This decharacterized waste contains underlying hazardous constituents that require further treatment to meet universal treatment standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

C. **RESTRICTED WASTE SUBJECT TO A VARIANCE**
This waste is subject to a national capacity variance, a treatability variance, or a case-by-case extension. Enter the effective date of prohibition in column 7 above.
☐ For hazardous debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR Part 268.45."

D. **RESTRICTED WASTE CAN BE LAND DISPOSED WITHOUT FURTHER TREATMENT**
"I have determined that this waste meets all applicable treatment standards set forth in 40 CFR Part 268 Subpart D, and all applicable prohibition levels set forth in Section 268.32 or RCRA Section 3004(d), and therefore, can be land disposed without further treatment. A copy of all applicable treatment standards and specified treatment methods is maintained at the treatment, storage and disposal facility named above." "I certify under penalty of law that I have personally examined and am familiar with the waste through analysis and testing or thorough knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d). I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."

E. **WASTE IS NOT CURRENTLY SUBJECT TO PART 268 RESTRICTIONS**
This waste is a newly identified waste that is not currently subject to any 40 CFR Part 268 restrictions.

Page 1 of 1

State Manifest No. NJA 2768021

Manifest Document No. 45774

Generator EPA ID No. NJD980536593

[illegible]



CWM Resource Recovery, Inc.

A Subsidiary of Chemical Waste Management, Inc.
4301 Infirmary Road
P.O. Box 453
West Carrollton, Ohio 45449
(513) 859-6101
800-722-1179
FAX: (513) 859-6282

September 15, 1997

Mr. Valdas Adamkus
Director Region V USEPA
77 West Jackson Blvd.
Chicago, IL 60604

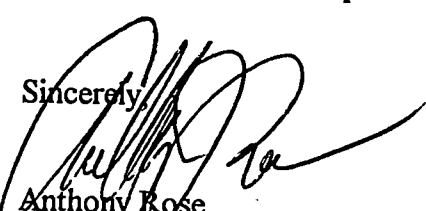
Subject: Unmanifested TSCA Waste Report

Dear Mr. Adamkus:

Pursuant to 40 CFR 761.211, enclosed is a written report of our facility's temporary receipt and subsequent rejection of unmanifested TSCA regulated wastes. This report is formatted to satisfy the requirements found in 761.211 (c). If you have any questions concerning this submittal please contact Karla Yakopcic at (937) 859-2207.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information submitted is, to the best of my knowledge and belief, true accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,


Anthony Rose
General Manager

cc: Tom Buchan OEPA
Donald Schregardus OEPA

Unmanifested TSCA Regulated PCB Waste Report

Report Number: 212

DATE of REPORT: 9/12/97

This form provides information required in 40 CFR 761.211(c) for reporting unmanifested TSCA waste.

1. EPA ID number, Name and Address of the Receiving Facility:

OHD093945293
CWM Resource Recovery
4301 Infirmary Road
West Carrollton, Ohio 45449 (937) 859-6101

2. Date facility received the Unmanifested TSCA Regulated PCB Waste: 8-29-97
Date facility confirmed TSCA level PCBs: 9-6-97

3. EPA ID Number, Name and Address of Generator and Transporter, as manifested:

GENERATOR:
EPA ID #:NJD980536593
AETS
1 Eden Lane
Flanders, NJ 07836

TRANSPORTER:
EPA ID #:NJD991291584
ETGI
EDEN LANE
FLANDERS, NJ 07836

4. Description of the Type and Quantity of the Unmanifested PCB Waste:

Shipping Description:

WASTE FLAMMABLE LIQUID

Type of Container:	Number of Containers:	Gallons:
DM	3	165
Manifest #	Line Item #:	Page #:
NJA2768021	10	2

5. Brief explanation of why the waste was unmanifested:

Presence of PCBs was not known to the generator at the time of shipment.

6. Disposition of the Unmanifested TSCA PCB Waste by the Receiving Facility:

Waste Rejected to Alternate TSDF:
BACK TO GENERATOR, AETS FLANDERS

Manifest supplied and completed on behalf of the Generator: Yes

DISTRIBUTION:

CWMRR

Customer Service
Kristin Jennings
Kevin Rankin

EPA

Tom Buchan, OEPA, Columbus
Donald Schregardus, OEPA, Columbus
Valdas Adamkus, USEPA Region V

Generator

Terry Blachak (Only if AETS, Flanders)