

461-02

New York State Department of Environmental Conservation

Region 8 Office - Division of Hazardous Substances Regulation
6274 East Avon-Lima Road
Avon, New York 14414-9519

Telephone: (716) 226-2466



Langdon Marsh
Commissioner

Peter J. Bush
Regional Director

CERTIFIED MAIL, RETURN RECEIPT REQUESTED

September 29, 1994

Mr. Randy Battaglia
Environmental Engineer
Seneca Army Depot
Route 96
Romulus, NY 14581

MB
11 OCT REC'D

Dear Mr. Battaglia:

Re: Hazardous Waste Compliance Inspection
Date: September 26, 1994
Location of Handler: Same as above

EPA Identification Number: NY 0213820830

In order to determine compliance with the New York State Hazardous Waste Regulations, the New York State Department of Environmental Conservation conducted an inspection of your facility on the above referenced date.

As a result of that inspection, we believe that your facility is operating as a generator and a treater, storer and/or disposer of hazardous waste.

6NYCRR Part 372.2(c)(3) requires that a generator who does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 15 days of the date of shipment, must immediately contact the transporter and/or disposal facility to determine the status of the shipment. If, within 20 days of date of shipment, the generator has not received a signed copy of the manifest, an Exception Report must be submitted to the Department and, in the case of interstate shipments, submitted to the State in which the shipment was to be received and any states in which the shipment may have been delivered. The Exception Report must include a legible copy of the manifest for which the generator does not have confirmation of delivery and a cover letter, signed by the generator or his authorized representative, explaining the efforts taken to locate the hazardous waste and the results of those efforts. You have not met these requirements and, therefore, are in violation of 6NYCRR Part 372.2(c)(3).

6NYCRR Part 373-3.5(c) requires the owner or operator of a hazardous waste facility to keep a written operating record at his facility. The following information should be included in the operating record, as it becomes available, or maintained in the operating record until closure of the facility:

- a description and quantity of each hazardous waste received.

You have not met the above requirement and, therefore, are in violation of 6NYCRR Part 373-3.5(c).

6NYCRR Part 376.5(a)(2) allows the owner or operator of a hazardous waste TSD to store restricted wastes for up to one year provided such storage was solely for the purpose of accumulation of such quantities as are necessary to facilitate proper recovery, treatment, or disposal. [The burden of proof that waste was not stored as stated above is on the Department.] You have not met this requirement and, therefore, are in violation of 6NYCRR part 376.5(a)(2).

Violations of the New York State Hazardous Waste Regulations may result in civil and criminal sanctions under the Environmental Conservation Law. Possible sanctions include a civil penalty of up to \$25,000 per day for a first offense and \$50,000 per day for a second offense. Should the cited violations not be corrected promptly, an action seeking a civil penalty will be initiated. Furthermore, please be advised that this letter in no way precludes future enforcement actions for any other violations discovered at any other time, nor does it relieve you from any liability you may have for regulatory fees and hazardous waste special assessment fees.

Please confirm in writing, within 30 days of the date of this letter, that the above referenced violations have been corrected and include supporting documentation. You MUST include your EPA Identification Number on all correspondence. This confirmation should be addressed to:

Dixon Rollins, P. E.
Environmental Engineer III
NYS Department of Environmental Conservation
Division of Hazardous Substances Regulation
6274 East Avon-Lima Road
Avon, NY 14414
(716)226-2466
Attention: Mr. C. Richmond, Inspector

with a copy to:

Janek Desai
NYS Department of Environmental Conservation
Division of Hazardous Substances Regulation
Hazardous Waste Compliance Unit
Compliance Inspection Section
50 Wolf Road - Room 427

Mr. Battaglia

3

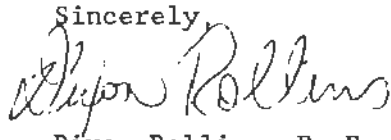
September 29, 1994

Albany, NY 12233-7253
(518)457-0532

Attention: Mr. Parag Amin, Reviewer

If you have any questions about this notice or should you wish to discuss this matter further, please contact the inspector or the reviewer at the telephone number above. A copy of the inspection form is enclosed for your information.

Sincerely,



Dixon Rollins, P. E.
Regional Hazardous
Substances Engineer

db
Enclosure

cc: J. Desai
C. Richmond, Inspector
P. Amin, reviewer
Seneca County Health Department



DEPARTMENT OF THE ARMY

SENECA ARMY DEPOT ACTIVITY
ROMULUS, NEW YORK 14541-5001

October 26, 1994

REPLY TO
ATTENTION OF

Office of Public Works

Mr. Dixon Rollins, P.E.
Regional Hazardous Substances Engineer
New York State Department of Environmental Conservation
Division of Hazardous Substances Regulation
6274 East Avon-Lima Road
Avon, New York 14414

Dear Mr. Rollins:

This correspondence is in reference to the hazardous waste compliance inspection on September 26, 1994 of Seneca Army Depot Activity (SEDA), EPA Identification Number NY0213820830.

In reference to your letter dated September 29, 1994 regarding the compliance inspection noted above, please note the following information and corrective actions:

6NYCRR Part 372.2(c)(3) requires that a generator who does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 15 days of the date of shipment, must immediately contact the transporter and/or disposal facility to determine the status of the shipment. If, within 20 days of the date of shipment, the generator has not received a signed copy of the manifest, an Exception Report must be submitted to the Department, and in the case of interstate shipments, submitted to the State in which the shipment was to be received and any states in which the shipment may have been delivered.

According to the inspection, SEDA had not submitted an Exception Report for manifest number NYB 484135-2 dated September 21, 1993. As noted on the Inspection Form, 47-15-14 (2/94), page VI-5, SEDA maintains a hazardous waste manifest log book for keeping track of manifest copies mailed back by TSDF's. According to that log, (enclosure 1), the disposal facility was contacted on October 4, 1993 to determine if the shipment had been received at the facility. Confirmation was received that the shipment was received at the facility on September 29, 1993, eight days from the date of the shipment. Although the manifest was signed by the TSDF official on September 29, 1993, the signed copy was not received by SEDA until October 14, 1993, or 23 days from the date of the shipment, and ten days from the date the disposal facility was contacted.

SEDA has reviewed and revised internal procedures for tracking manifests. In instances where a signed copy of a manifest is not received within 10 days from the date of shipment, the disposal facility will be contacted. In cases where the shipment is confirmed as having arrived at the facility, SEDA will request a datafax of the signed manifest be sent immediately.

SEDA has submitted an Exception Report for manifest number NYB 4841325-2 (enclosure 2).

6NYCRR Part 373-3.5(c) requires the owner or operator of a hazardous waste facility to keep written operating records at his facility. The following information should be included in the operating record, as it becomes available, or maintained in the operating record until closure of the facility:

- a description and quantity of each hazardous waste received.

This issue involved the inventory list for building 803, SEDA's conforming storage facility for mixed waste. The inventory list showed EPA waste code F003 which did not match the F002 waste code on ten drums in storage.

The inventory list has been corrected to show the F002 waste code and responsible SEDA personnel were instructed as to the importance of proper record keeping. The SEDA Environmental Coordinator will conduct periodic reviews to ensure that inadvertent mistakes of this nature are not repeated.

6NYCRR Part 376.5 (a)(2) allows the owner or operator of hazardous waste TSD to store restricted wastes for up to one year provided such storage was solely for the purpose of the accumulation of such quantities as are necessary to facilitate proper recovery, treatment, or disposal. The burden of proof is on the Department to show that waste was improperly stored.

SEDA will continue to work with the U.S. Army Armament Munitions and Chemical Command, Rock Island in finding a suitable site for the treatment and/or disposal of mixed wastes. At this time, SEDA and the U.S. Army are unaware of an authorized storage facility in the State of New York or elsewhere. Until such time as a proper facility is found, SEDA will continue to store the mixed wastes in compliance with conforming storage regulations. SEDA is also requesting an exemption from mixed waste storage after October 6, 1995 due to the National Capacity under a separate cover.

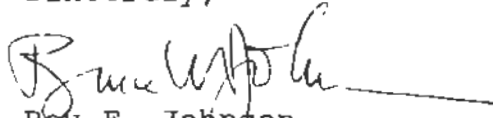
For some time, SEDA has been pursuing a resolution to the mixed waste issue. This matter has been repeatedly discussed at

-3-

the SEDA monthly hazardous waste management meetings (examples are attached as enclosure 3). In addition, SEDA has requested the assistance of the authorized agent for the U.S. Army for the storage or disposal of low level radioactive waste (enclosure 4). Unfortunately, there is presently no immediate resolution to this problem. SEDA will continue to work with U.S. Army organizations responsible for contracting for the disposal of low level radioactive waste and mixed wastes to bring about a satisfactory resolution to this issue. Any assistance from the New York Department of Environmental Conservation in finding a suitable disposal site would be gratefully appreciated.

If the corrective actions described above are not adequate or should you have any questions, contact Mr. Thomas F. Grasek or Mr. Randall Battaglia, of my staff, at (607) 869-1450.

Sincerely,

per 
Roy E. Johnson
LTC, U.S. Army
Commanding Officer

Enclosures

Copies furnished:

Janakrai Desai, Reviewer, NYSDEC (Albany)
Mr. Parag Amin, Reviewer, NYSDEC (Albany)
CDR, DESCOM, AMSDS-IN-E
CDR, TOAD, SDSTO-PE-P

Sm
C, PW

C, IMD

CEA

MANIFEST NO.	MANIFEST DATE	DESTINATION	TRANSPORTER	COPY 3 & 4 SENT OUT	10 DAYS	20 DAYS	COPY 5 DATED	RECEIVED	COMMENTS
NYB 413634-6	7-7-93	AVON, NY	SAFETY KLEEN	7-8-93	7-17-93		7-7-93	7-12-93	
MINNESOTA MN151094	7-7-93	APTUS LAKEVILLE MN	NORTHEAST ENVIRONMENTAL SERVICES	7-8-93	7-17-93	7-27-93	7-19-93	7-22-93	Called Captin ... said shipment arrived 19 JUL 93
NYB 544692-1	7-7-93	WARRENVILLE NY	Northeast Environmental Services	7-8-93	7-17-93		7-8-93	7-14-93	
NEW JERSEY NJ A1688112	7-9-93	CYCLE CHEM ENZOETH N.J.	EMVIA. PRODUCTS & SERVICES	NEW YORK 7-14-93 NEW JERSEY	7-19-93		7-14-93	7-19-93	Received letter from NYS did not receive letter from Capt. Chin as of 11 Aug 13 1993 sent thru Capt.
VERMONT VT0058902	7-9-93	POLLUTION SOLUTIONS SYSTEMS WILMINGTON, VT	ENVIR. PRODUCTS & Services	NEW YORK 7-14-93 VERMONT	7-19-93		7-15-93	7-19-93	
NYB 417246-3	7-22-93	AVON, NY	Safety Kleen	7-27-93	8-6-93		7-22-93	7-26-93	
NYB 417223-8	8-5-93	AVON, NY	Safety Kleen	8-5-93	8-15-93		8-5-93	8-10-93	
NYB 417110-7	8-11-93	AVON, NY	Safety Kleen	8-13-93	8-21-93		8-11-93	8-16-93	
NYB 417220-2	9-2-93	AVON, NY	Safety Kleen	9-7-93	9-12-93		9-2-93	9-7-93	
NYA 717134-2	9-8-93	AVON NY	Safety Kleen	9-8-93	9-18-93		9-8-93	9-14-93	
NYB 484135-2	9-21-93	APTUS COFFEYVILLE, KS	APTUS, IND	9-22-93	10-1-93	10-11-93	9-29-93	10-14-93	Called Captin 10-4-93 said received 9-27-93 will send copy to me
NYB 417217-5	9-29-93	AVON, NY	Safety Kleen	9-29-93	10-9-93		9-29-93	10-3-93	



DEPARTMENT OF THE ARMY

SENECA ARMY DEPOT ACTIVITY
ROMULUS, NEW YORK 14541-5001

REPLY TO
ATTENTION OF

October 20, 1994

Office of Public Works Branch

Mr. Dixon Rollins, P.E.
Regional Hazardous Substances Engineer
New York State Department of Environmental Conservation
Division of Hazardous Substances Regulation
6274 East Avon-Lima Road
Avon, New York 14414

Dear Mr. Rollins:

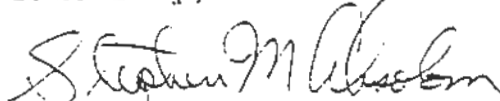
This correspondence shall serve as an Exception Report for hazardous waste manifest NYB 484135-2 dated 9-21-93 (enclosure 1) for Seneca Army Depot Activity (SEDA), EPA Identification Number NY0213820830 as required by 6NYCRR Part 372.2(c)(3).

During SEDA's annual hazardous waste compliance inspection on September 26, 1994 SEDA received a violation of 6NYCRR Part 372.2(c)(3) for not having submitted to the Department an Exception Report for the above referenced manifest.

SEDA maintains a hazardous waste manifests log book for keeping track of manifest copies mailed back by TSDF. According to that log, (enclosure 2), the disposal facility was contacted on 10-4-93. At that time it was determined that the shipment had been received by the facility on 9-29-93 eight days from date of shipment. However the actual copy of the signed manifest, which was signed on 9-29-93, was not received by SEDA until 10-14-93 twenty three days from the date of shipment and ten days from the date when the disposal facility was contacted. Cause for this ten day delay in SEDA receiving the signed copy is unknown and not something SEDA has control over. SEDA will continue to track manifests using the log book, but in cases where the signed manifest from the disposal facility has not been received within 15 days. The facility will not only be contacted but will be requested to FAX a copy of that signed manifest immediately. This procedure should avoid SEDA having to file Exception Reports for administrative problems at the disposal facility and for any mailing delays which might occur.

If this Exception Report is not adequate or should you have any questions, contact Mr. Thomas F. Grasek or Mr. Randall Battaglia, of my staff, at (607) 869-1450.

Sincerely,


Stephen M. Absolom
Chief, Public Works

Enclosures

Enc. 2

MANIFEST NO.	MANIFEST DATE	DESTINATION	TRANSPORTER	COPY 3 & 4 SENT OUT	10 DAYS	20 DAYS	COPY 5 DATED	RECEIVED	COMMENTS
NYB 413634-6	7-7-93	AVON, NY	SAFETY KLEEN	7-8-93	7-17-93		7-7-93	7-12-93	
MINNESOTA MN151079	7-7-93	APTUS LAKEVILLE MN	NORTHEAST ENVIRONMENTAL SERVICES	7-8-93	7-17-93	7-27-93	7-19-93	7-22-93	Called Aptus and received signature 19 JUL 93
NYB 549691-1	7-7-93	WARSAW, NY	Northeast Environmental Services	7-8-93	7-17-93		7-8-93	7-14-93	
NEW JERSEY NJ168812	7-9-93	CYCLE CHEM ELIZABETH N.J.	EMVIA. PRODUCTS & SERVICES	NEW YORK 7-14-93 NEW JERSEY	7-19-93		7-14-93	7-19-93	Received letter from NY did not receive letter from Cycle Chem as of 11/2 3/93 and then copy
VERMONT VT0058902	7-9-93	POLLUTION SOLUTIONS OF VERMONT WILMINGTON, VT	EMVIA. PRODUCTS & Services	NEW YORK 7-14-93 VERMONT	7-19-93		7-15-93	7-19-93	
NYD 417246-3	7-27-93	AVON, NY	Safety Kleen	7-27-93	8-6-93		7-22-93	7-26-93	
NYB 417223-8	8-5-93	AVON, NY	Safety Kleen	8-5-93	8-15-93		8-5-93	8-10-93	
NYB 417110-4	8-11-93	AVON, NY	Safety Kleen	8-13-93	8-21-93		8-11-93	8-16-93	
NYD 417220-2	9-2-93	AVON, NY	Safety Kleen	9-7-93	9-12-93		9-2-93	9-7-93	
NYB 417134-2	9-8-93	AVON NY	Safety Kleen	9-8-93	9-18-93		9-8-93	9-14-93	
NYD 484135-2	9-21-93	APTUS COFFEYVILLE, KS	APTUS, IND	9-22-93	10-1-93	10-11-93	9-29-93	10-14-93	Called Aptus 10/24 and received 9-29-93 signature
NYB 417217-5	9-29-93	AVON, NY	Safety Kleen	9-29-93	10-9-93		9-29-93	10-3-93	

STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF HAZARDOUS SUBSTANCES REGULATION

HAZARDOUS WASTE MANIFEST

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

Form Approved OMB No. 2050-0039 Expires 9-30-94

Please print or type. Do not Staple.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA No. NY0213820830	Manifest Document No. AP 89 5	2. Page 1 of 2	Information in the shaded areas is not required by Federal Law.
3. Generator's Name and Mailing Address SENECA Army Depot ACTIVITY, Attn: STEVE MESSERIM Bldg 123, Romulus, N.Y. 14541		A. State Manifest Document No. NY B 484135 2		B. Generator's ID	
4. Generator's Phone (607) 867-1403		C. State Transporter's ID		D. Transporter's Phone (612) 485-8075	
5. Transporter 1 (Company Name) Aptex, Inc.		6. US EPA ID Number 212980791321		E. State Transporter's ID	
7. Transporter 2 (Company Name)		8. US EPA ID Number		F. Transporter's Phone	
9. Designated Facility Name and Site Address Aptex, Inc. P.O. Box 1128/Box 109 North Catskill, NY 67337		10. US EPA ID Number 212981506025		G. State Facility's ID	
				H. Facility's Phone (315) 231-6300	
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)		12. Containers	13. Total Quantity	14. Unit	15. Waste No.
a. NO HAZARDOUS SUBSTANCE, SOLID, H.S.S., GR-1, IN 9106 (POLYCARBONATE BLENDED)		No. Type		Wt/Vol	EPA STATE
					N/A
b. (Poly-carbonate Biphonols) Liquid					EPA STATE
					N/A
c.					EPA STATE
d.					EPA STATE
J. Additional Descriptions for Materials listed Above		K. Handling Codes for Wastes Listed Above			
a. DRUM OF CAPS > 500		B			
b. DRUM OF CAPS < 500		B			
15. Special Handling Instructions and Additional Information See Enclosed Contingency Plan Back Order #10051 URGENT PHONE 607-869-1316 ERS # 31 <i>Diana D. K. K. K.</i>					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations. If I am a large quantity generator, I certify that I have program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method 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 generator, I have made a good faith effort to minimize my waste and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name Thomas GRASEK		Signature <i>Thomas Grasek</i>		Mo. Day Year 09 21 93	
17. Transporter 1 (Acknowledgement of Receipt of Materials) Printed/Typed Name Howard J. Vaughan		Signature <i>Howard J. Vaughan</i>		Mo. Day Year 09 21 93	
18. Transporter 2 (Acknowledgement of Receipt of Materials) Printed/Typed Name		Signature		Mo. Day Year	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.					
Printed/Typed Name Jerry Dobson		Signature <i>Jerry Dobson</i>		Mo. Day Year 09 21 93	

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

(ENCL 1)

COPY 5 - Generator-mailed by TSD facility

NY B 484135 2

10/21/94 09:51 717 894 7005

TOAD EVIR MGMT

004

10/20/94 13:07 607 869 1362

SENECA - DEH

TOAD EVIR MGMT *Excl 4* 004

HAZARDOUS WASTE MEETING
11 JAN 94, 0930, B-323

1. Attendees: Gerry Maine, Randy Battaglia, Tom Grasek, John Hennessy, Mike Lewis and Mike Warner.

Members Absent: Bruce Johnson (TDY), Dennis Wells (TDY), Randy Walter (TDY) and Ray Forde (TDY).

2. Discussion items:

a. Previous minutes of 30 Nov 93 were approved as written.

b. Thermal batteries: Gerry Maine will check on status of batteries from Picatinny - if received, need to advise Randy Battaglia of date received and how many. If Seneca did receive them, an Unmanifested Waste Report will have to be filed.

c. Annual Hazardous Waste Inspection - Randy Battaglia advised that he received a follow-up letter on the annual inspection and Seneca responded, disagreeing with one of DEC's findings -- 90 days storage area and a satellite accumulation area. The main problem was the use of safety cans in Bldg 816 (the cans must be labeled exactly like the hazardous waste barrels). To resolve this situation, we are doing away with safety cans and will utilize the drums, redesignating the hazardous waste accumulation area in the shop, within a striped off area.

Status of solvents used in the past: Solvents will be handled thru DRMO since we no longer have a need for them.

Seneca will not be fined for the last Annual Hazardous Waste Inspection since DEC is happy with our answers.

d. A list of hazardous waste trained personnel and when they were last trained must be submitted to Tom Grasek. S: 20 Jan 94 - Each applicable Branch Chief.

e. Status of stacks of nontreated wood/wood pallets: The meeting with NYSEG was not favorable. They indicated that perhaps they could be a middleman for disposal of this wood; however, should they have someone interested in it, DRMO will handle the details. We need to pursue another avenue in the Spring.

f. Duds in demo grounds: Randy Battaglia will follow-up with Jim Jones to ensure proper disposal.

g. Disposal of mixed wastes: Mike Lewis forwarded a memo to AMCCOM requesting disposal instructions and will furnish Randy Battaglia a copy of request/response for his file, since exemption of the Federal Reserve Compliance Act expires in 1995, the last year we can store mixed wastes. Per Mike, the NRC feels it will be five years plus before any resolution will be made!

Hazardous Waste Mtg, 30 Nov 93

g. John Hennessy questioned the status of stacks of nontreated wood that continues to be added to weekly (at the rate of 2 dump truck loads/wk); also multiple stacks of nontreated wood pallets. Tom Grasek indicated this concern is being worked by Steve Absolom (utility company utilization is being pursued). Tom will get back with John Hennessy. A recommendation to make the wooden pallets accessible to the public, for a nominal charge, should be pursued also.

h. We have a pile of items recovered that were duds (connected use fuses, parts, cartridges) that need to be disposed of. Classified components have a PRON to get rid of these.

i. There will be refresher training on hazardous wastes, 8 Dec, B103 Trng Rm for supervisors. Memo will follow per Tom Grasek. Tom will be requesting info on areas where we generate hazardous waste, names of handlers and when they were last trained.


TASKING: RANDY WALTER - Prepare a concurrence sheet for all the handlers indicating that they have read and understand SEADR 420-2 - have them read the reg and sign the sheet. In the future, if we have repeat findings, disciplinary action will be taken.

TASKING: MIKE LEWIS - Again, request disposal of mixed wastes by AMCCOM, Rock Island.

REMINDER: An air inventory will be conducted after 31 Dec. Also, if you use any paint booth, emission point sources are to be kept (record of run time and what paints are being used).

TASKING: Garry Maine, but sure to have Mike Warner attend all future meetings.

3. The next meeting is scheduled for Tuesday, 11 Jan 94, 0800, B-323.


RANDY WALTER
Hazardous Waste Manager

CF:
Ea Attendee
CEA/CDR
C, Public Works

HAZARDOUS WASTE MEETING
20 Jun 94, 0930, B-323

1. Attendees: Bruce Johnson, John Hennessy, Randy Battaglia, Dennis Wells, Randy Walter, Tom Grasek, Mike Lewis, Gerry Maine, Ray Forde, Mike Warner, Bob Bishop, and Bob Huneau. All members present.

2. Discussion Items:

a. Previous minutes of 26 Apr 94 were approved as written.

b. Alternative disposal of untreated wood - a contractor will be on depot 22-23 Jun to chip untreated wood (will start with B356 and move to the scrap wood pile, B612 and Demo Grounds).

c. Radiological holding sites: Tom Grasek suggested/requested that B-803 be returned to a "useable state" complete with dehumidifiers/heat, since this building has a permit for mixed waste storage. The Environmental Office would have to submit an application for any other storage area. Safety suggested an igloo be used for rad waste storage and Gerry Maine indicated Igloo 101 or 102 would be available.

d. Reference burning of 3.5" rockets: project is put on hold pending AMCCOM decision to fund.

e. Thermal batteries may be placed in a drum and turned in to B-307, Randy Battaglia.

f. Mike Lewis indicated the Environmental Assessment for the NRC License was sent 24 May 94.

g. Disposition of empty 55-gal metal drums - per Tom Grasek, notify him before you bring barrels up to be triple-rinsed at B-117 with the Steam Jenny. They have to be stenciled "triple-rinsed", and then turned into DRMO for sale.

3. ACTION Items:

a. Status of Mixed Waste B-803: M. Lewis received notification from AMCCOM that radiological waste will be picked up within 4-5 months. He will check status of mixed waste to determine if we can ship low-level radioactive waste at the same time.

b. Cursory inspection by Tom Grasek included two drums found in B-312 that were filled with dirt. Identification will be made by Tom Grasek and Randy Walter.

c. Tom Grasek will be the POC on P1A crushing activity. Due to asbestos content (hazardous air pollutant), it will be necessary to have the Fire Dept on-hand.

OCT-20-94 THU 13:13

a

FAX NO. 9297684

P.02

REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
 SENeca ARMY DEPOT ACTIVITY
 FORT MALLER, NEW YORK 14841-5001

SDSSE-LS (385-11)

1 Jul 94

MEMORANDUM THRU:

Commander, Tobyhanna Army Depot, Attn: SDSTO-YO, Tobyhanna, Pa
 18466-5040

Commander, U.S. Depot System Command, Attn: AMSDS-IN-S, Chambersburg,
 PA, 17201-4170

FOR: Commander, U.S. Army Armament, Munitions, and Chemical Command,
 Attn: AMSMC-SER, Rock Island, IL 61299-6000

SUBJECT: Disposal of Radioactive Waste

1. Reference AMTCOM Pamphlet 385-1.
2. Request that disposal instructions be given for Twenty-one barrels of mixed waste. Enclosed are two memos from Ebasco Environmental dated Dec 15, 93 and Apr 29, 93 giving a history of efforts to get a determination of hazardous/non-hazardous from New York State.
3. Request on site visit(s) by Health Physicist to determine activity, and any testing required.
4. Space, personnel, packaging material, and handling equipment will be supplied by Seneca Army Depot Activity.
5. Point of contact is Mr. Michael R. Lewis, SDSTO-SES, DSN 489-5261/5432.

Encls

MICHAEL R. LEWIS
 Radiation Protection Officer

10/21/94 09:53

717 894 7005

TOAD EVIR MGMT

007

OCT-20-94 THU 13:13

a

FAX NO. 9297684

End B

P.01



DEPARTMENT OF THE ARMY

SENECA ARMY DEPOT ACTIVITY
ROMULUS, NEW YORK 16891-6001

REPLY TO
ATTENTION OF

13 Jan 94

SDSTO-SES (385-11)

MEMORANDUM THRU: Headquarters, U.S. Army Depot System
Command, Attn: AMSDS-IN-S
Chambersburg, PA 17201-4170

FOR: Commander, U.S. Army Armament, Munitions, and
Chemical Command, Attn: AMSMC-SFR,
Rock Island, IL 61299-6000

SUBJECT: Disposal of Unwanted Radioactive Waste

1. Reference AMCCOM Pamphlet 385-1.
2. Request that disposal instructions be given for items listed on enclosure 1.
3. Request on site Health Physicist assistance due to unknown activities. Seneca will supply labor and materials.
4. Point of contact is Mr. Michael R. Lewis, SDSTO-SES, DSN 489-5261/5432.

MICHAEL R. LEWIS
Radiation Protection Officer

Encl

OPTIONAL FORM 98 (7-90)

FAX TRANSMITTAL

of pages > 2

To <i>Mr. Joe Maciejewski</i>	From <i>Tom Stuncic</i>
Dept./Agency <i>TJBY ENVIR</i>	Phone # <i>DSN 489-5261</i>
Fax # <i>717-895-7005</i>	Fax # <i>DSN 489-5950</i>

NSN 7540-01-317-7368

5089-101

GENERAL SERVICES ADMINISTRATION

E-4

HW Management

SDSTO-SEI-P (200)

8 March 1994

MEMORANDUM FOR All Supervisors

SUBJECT: Hazardous Waste Management

1. Enclosed is a copy of SEAD-R 420-2, Hazardous Waste Management, with the applicable sections requiring supervisors to have their job descriptions updated should they be responsible for the management of hazardous waste.
2. As we review job descriptions for the new TDA, it is important to remember that supervisors must have hazardous waste responsibilities annotated as part of their job description. We are at an ideal time to make this change if it has not already occurred.
3. Please forward a copy of each approved job description showing hazardous waste responsibilities for each supervisor to the Environmental Office at your earliest convenience.
4. Should you have any questions, please contact Mr. Thomas Grasek at Ext. 41-450.

Encl



STEPHEN M. ABSOLOM
Chief, Public Works

HEADQUARTERS
SENECA ARMY DEPOT
ROMULUS, NY 14541-5001

SEAD REGULATION
NO. 420-2

19 MAY 1993

Facilities Engineering
HAZARDOUS WASTE MANAGEMENT

1. Purpose. This regulation prescribes responsibilities, standards, and procedures for the efficient and economical management of hazardous waste (HW) in an environmentally acceptable manner at Seneca Army Depot (SEAD).

2. Applicability statement. This regulation is applicable to all SEAD activities, to all tenant commands, activities and organizations, and to all users of SEAD facilities.

3. References.

a. AR 25-30, The Army Integrated Publishing and Printing Program.

b. AR 200-1, Environmental Protection and Enhancement.

c. AR 420-47, Solid and Hazardous Waste Management.

d. 6 NYCRR 370, Hazardous Waste Management System: General.

e. 6 NYCRR 371, Identification and Listing of Hazardous Wastes.

f. 6 NYCRR 372, Hazardous Waste Manifest System and Related Standards for Generators, Transporters, and Facilities.

g. 6 NYCRR 373, Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities.

h. 40 Code of Federal Regulation (CFR), Protection of Environment.

i. 49 CFR, Transportation.

4. Definitions.

a. Hazardous waste (HM). Any discarded materials identified in 40 CFR, Part 261.3.

b. Hazardous waste management (HWM). The control of the collection, source separation, storage, transportation, processing, treatment, recovery, and disposal of HW.

*This regulation supersedes SEAD-R 420-2, 6 June 1983

SEAD-R 420-2

c. Generator. Any person, by site, whose act or process produces HW.

d. Spill. The accidental and/or deliberate discharge or release of a pollutant.

e. Treatment, storage, or disposal facility (TSDF). All contiguous land, improvements to the land, structures, and facilities used for treating, storing, or disposing of HW licensed by the Environmental Protection Agency (EPA) to conduct such operations. SEAD fits the definition of a TSDF because the disposal of HW occurs at the open detonation grounds by exploding ordnance, treatment of HW occurs at the open burning grounds by the burning of propellant, and the storage of HW occurs at buildings 301, 307, and 803.

~~7. Responsibilities~~

a. The depot commander will:

(1) Ensure hazardous waste management (HWM) activities are conducted according to federal, state, and local regulations.

(2) Provide the necessary resources to ensure compliance with federal, state, and local regulations.

b. All commanders, ~~major activity directors,~~ and ~~supervisory personnel~~ will:

(1) Ensure that the policies stated in this regulation and appendix A, B, and C are carefully observed within their activity and cooperate fully with the Engineering/Environmental Management Division (EEMD) personnel, Directorate of Engineering and Housing (DEH) in managing HW.

(2) Ensure that all suspected HW generated by their activity is reported in writing to EEMD personnel for the purpose of verification and record keeping.

(3) Make every attempt to decrease or eliminate HW through recycling, reclaiming, reuse, or alternate processes.

(4) Ensure that all HW generated by their activity is accumulated, handled, and removed in accordance with (IAW) this regulation.

~~(5) Identify and supervise all HW handlers and activity. The civilian personnel of the depot are to be trained in the job descriptions.~~

(6) Ensure that all supervisors of HW handlers are fully trained, aware, and knowledgeable of HWM requirements.

(a) Weekly and monthly HW storage area inspection reports shall be completed by Directorate of Engineering and Housing (DEH) personnel for HW storage buildings 301 and 307.

(b) The weekly HW storage area inspection report shall be completed DMO personnel for the mixed waste storage area in building 803. The report shall be sent to EEMD within two days of the inspection date.

k. Inspections.

(1) Accumulation areas will be inspected daily for leaking or deteriorated containers by the generator.

(2) Buildings 301 and 307 will be inspected weekly using the SDSSE-HE Form SDSSE-HE 201, Building 301 Hazardous Waste Storage Area Inspection Report, and SDSSE-HE Form SDSSE-HE 201-1, Building 307 Hazardous Waste Storage Area Inspection Report, by the Fire Protection Division, DEH. These inspection reports will be forwarded to EEMD. See appendix C and D for samples.

(3) Buildings 301 and 307 will be inspected monthly using the SDSSE-HE Forms 201 and 201-1 by EEMD personnel.

(4) Building 803 (mixed waste storage area) will be inspected weekly using the SDSSE-HE Form 201-2, Building 803 Hazardous Waste Storage Area Inspection Report, by DMO personnel. See appendix E for a sample.

l. Spill prevention and control.

(1) In the event of an HW spill, containment and clean up will be accomplished by the Depot Spill Response Team (DSRT). However, if the activity/generator responsible for the event, is properly trained and equipped, it may take action to curtail, contain, and clean up spillage prior to the arrival of the DSRT.

(2) Fire Protection Division personnel will immediately be notified in the event of a spill. Those personnel will in turn notify the DSRT for implementation of appropriate actions as specified in the Depot Spill Prevention Control and Countermeasure Plan and Depot Spill Contingency Plan.

(3) Upon the arrival of the DSRT at the spill site the activity/generator responsible for the spill event will:

(a) Provide all the necessary information pertaining to the spill to the DSRT.

(b) Provide to the DSRT whatever assistance they may require, as determined by the DSRT incident commander.

(4) All activities which store quantities of petroleum products, hazardous materials or accumulate/store HW will be

SEAD-R 420-2

familiar with the spill response procedures outlined in the Depot Spill Contingency Plan.

(5) A spill training exercise will be conducted annually by the DSRT.

m. Training requirements.

(1) General. ~~Each supervisor who is responsible for the generation of HW shall have this duty noted on their job description.~~ These supervisors must successfully complete a program of classroom instruction which teaches them to perform their duties in a way that ensures compliance with the 6 NYCRR 373-2 and 373-3. This training program must be directed by an instructor trained in HWM procedures (including contingency plan implementation). The Army Logistics Management Center (ALMC) Defense Hazardous Material/Waste Handling Course will satisfy this requirement. Once trained, responsible supervisors will be required to attend an annual update of training in the form of a review/workshop. The SEAD Hazardous Waste Handling Review Workshop will satisfy this requirement.

(2) Trained supervisors will conduct the training of any new and/or detailed employees within six months in the procedures of handling HW as it pertains to the job they will be performing. Procedures review shall occur annually and/or any time procedures change. Training shall include as a minimum, the identification of the waste being generated, the properties which make it a HW, proper handling of that waste, safety procedures, and emergency response procedures.

(3) Directorate of Engineering and Housing training responsibilities. Personnel from DEH will:

(a) Schedule and conduct at least two SEAD HW Handling Review workshops for supervisors per fiscal year. The review will be directed by an instructor trained in HWM procedures and shall include instructions on the following procedures:

- 1 Packaging.
- 2 Labeling.
- 3 Administrative record keeping.
- 4 Safety procedures.
- 5 Emergency response procedures.

(b) Keep up-to-date with current regulations and HW handling procedures to implement the training program.



DEPARTMENT OF THE ARMY

SENECA ARMY DEPOT ACTIVITY
ROMULUS, NEW YORK 14541-5001

REPLY TO
ATTENTION OF
SDSTO-SEI-PE

June 16, 1994

Bob
info
S/L
KMM
1995

MEMORANDUM FOR Cdr, HQ, Depot System Command, ATTN: AMSDS-IN-E, (Ms. Michaels), Chambersburg, PA 17201

SUBJECT: Draft DOD Policy, "Environmental Requirements Applicable to Outdoor Small Arms Ranges"

1. Reference: a. Memorandum, HQ, AMCCOM, 27 May 94, SAB.
b. Memorandum, HQDA, OASA(IL&E), 11 Apr 94, SAB.

2. Requested comments are as follows:

a. ref para 5.G.- Installation commanders should not be required by policy to perform groundwater monitoring(GWM). In New York State, training ranges are unregulated. Ranges were discussed as sites of potential contamination when addressing corrective action for Solid Waste Management Units and other sites managed under SEDA's Installation Restoration Program. New York State and the Environmental Protection Agency agreed with the argument that civilian ranges such as state police, local police, and gun clubs are unregulated. GWM is expensive and requires in-house manhours to manage.

b. ref para 5.I.- The use of the term "shall be closed..." should be changed. A statement such as "Installations shall ensure that existing small arms ranges which are no longer required to support mission requirements are managed to ensure that the environment is protected and in accordance with all applicable... standards." The use of the term "closure" may invoke RCRA closure requirements in some states. This would be a very rigorous and expensive cleanup; an unregulated cleanup of a range could be very protective of the environment without meeting RCRA standards. As noted in para 5.H., the DERP is a risk-driven process. Although lead and copper bullets (etc.) may be in the berm, they may not pose a significant environmental risk at a particular range, and regulators in the state and EPA region may agree it is not a concern.

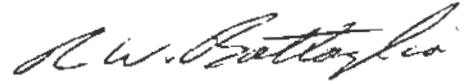
c. ref para 5.J.- Best Management Practices (BMP's) are important to ensure that a range does not contaminate the environment. However, the specific requirements in para 5.J.(1-5) should not be required at all ranges unless there is sufficient documentation that all small arm ranges will contaminate the environment if the specific BMP's are not performed. SEDA has a small environmental staff, and a small arms range that is intermittently used by Army Reserve units and the National Guard.

SDSTO-SEI-PE

June 16, 1994

To fully comply with BMP's, this would mean a large amount of time spent for a small mission; also, the costs to maintain the range may inhibit SEDA's capability to perform its support mission. SEDA currently has no regulatory requirement to perform sampling at its range, and the RCRA Corrective Action as well as CERCLA regulators have addressed the range and are not concerned with it.

3. POC for this is the undersigned at DSN 489-5450.



Randall W. Battaglia
Environmental Coordinator

OPTIONAL FORM 99 (7 90)

FAX TRANSMITTAL		# of pages ▶ 2
To <i>Diane Michaels</i>	From <i>R.W. Battaglia</i>	
Dept./Agency <i>RM5DS-IN-E</i>	Phone # <i>DSN 489-5450</i>	
Fax #	Fax #	

NSN 7540-01-317 7368 5099-101 GENERAL SERVICES ADMINISTRATION

JUN-08-1994 15:26 FROM DESCOM ENVIRONMENTAL TO SEAD ENVIRO OFC P.01/09

FAX Routing and Transmittal Slip		Date
		2 June 94
To	Initials	Date
1. See Distribution		
2.		
3.		
4.		
5.		
Purpose: Request for comments to DOD Draft Policy		Total Pages: 9
Subject: Draft: Environmental Regmts Applicable to Outdoor Small Arms Ranges		
Due to the short suspense back to AMCCOM request you review the draft and comment as applicable by FAX to this office ASAP.		
Negative replies are requested.		
<input type="checkbox"/> Receipt Confirmation Requested		

FROM Diane Michaels US Army Depot System Command Attn: AMSDS-IN-E Chambersburg, PA 17201	Room No. -Bldg Bldg. 10 Phone No. DSN: 570-9427, Ext _____, Fax: 8264
---	--

DISTRIBUTION

- All Environmental Coordinators.
 - ANAD, SDSAN-DEL-EM, x6350, fax 571-7726, attn: _____
 - BGAD, SDSBG-IOE-E, x3845, fax 745-4144, attn: _____
 - CCAD, SDSCC-HAE, x2732, fax 861-1173, attn: _____
 - LEAD, SDSLE-EN, x9690, fax 570-5287, attn: _____
 - SVDA, SDSLE-VA, x8827, fax 790-5294, attn: _____
 - RRAD, SDSRR-WE, x3559, fax 829-4324, attn: _____
 - SEAD, SDSSE-HE, x5450, fax 489-5362, attn: _____
 - SIAD, SDSSI-ENV, x4600, fax 855-4349, attn: _____
 - TEAD, SDSTE-WE, x3559, fax 790-2839, attn: _____
 - PUDA, SDSPU-EE, x4229, fax 749-4895, attn: _____
 - UMDA, SDSUAI-EO, x5294, fax 585-6025, attn: _____
 - TOAD, SDSTO-EM, x7090, fax 795-7005, attn: _____
- All Pollution Prevention CTXs.
 - ANAD, WTPs _____ Tim Garret x6350, fax 571-772
 - ANAD, Petro Solvents _____ Steve Guthrie x6624, fax 571-418
 - ANAD, Halons _____ Greg Jones x6350, fax 571-772
 - CCAD, ODCs _____ Chuck Gawenis x4170, fax 861-117
 - CCAD, Chromates _____ Jim Holiday x3243, fax 861-390
 - LEAD, Chem. Depaint _____ Dennis Reed x9427, fax 570-826
 - RRAD, Mech. Depaint _____ Renita Foster x4117, fax 829-432
 - RRAD, Chloro Solvents _____ Ed Hanna x3658, fax 829-336
 - TOAD, Plating _____ Pat Tierney x6724, fax 759-653
 - TEAD, Paint _____ Ken Wong x2011, fax 790-392
- HQAMC, AMCEN-A, x9016, fax 284-3409, attn: _____
- _____, x _____, fax _____, attn: _____
- _____, x _____, fax _____, attn: _____
- _____, x _____, fax _____, attn: _____
- _____, x _____, fax _____, attn: _____

Receipt Confirmation Requested



DEPARTMENT OF THE ARMY
HEADQUARTERS, U.S. ARMY ARMAMENT, MUNITIONS AND CHEMICAL COMMAND
ROCK ISLAND, ILLINOIS 61299-6000



REPLY TO
ATTENTION OF

S: 17 Jun 94

AMSMC-EQ (200-1a)

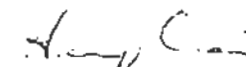
27 MAY 1994

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Draft DOD Policy, "Environmental Requirements
Applicable to Outdoor Small Arms Ranges"

1. Reference memorandum, HQDA, OASA (IL&E), 11 Apr 94, SAB (encl 1).
2. The subject draft policy is being submitted for review and comment by the government staff. It pertains to policies that may affect operations and maintenance of the range(s) at your installation. This policy review does not require any action by the operating contractor and no costs are associated with the review.
3. An interim response has already been submitted (encl 2). Our final response, however, will be based on comments generated during your review of this policy. Request your comments be submitted NLT 17 Jun 94.
4. This request for review has been coordinated with HQ, AMCCOM Procurement Directorate and the Plant Operation Office.
5. The POC is Tony Livingston, AMSMC-EQM, DSN 793-0082.

2 Encls

for 
Robert J. Radkiewicz
Director, Environmental Qual Dir

DISTRIBUTION:

Commander,
Pine Bluff Arsenal, ATTN: SMCPCB-EM, 10020 Kabrich Circle, Pine Bluff, AR 71602-9500
Rock Island Arsenal, ATTN: SMCRI-SEM, Rock Island, IL 61299-5000
Watervliet Arsenal, ATTN: SMCWV-EHQ, Watervliet, NY 12189-4050
U.S. Army Armament Research, Development & Engineering Center,
ATTN: SMCAR-SEA, Picatinny Arsenal, NJ 07806-5000

ENVIRONMENTAL REQUIREMENTS APPLICABLE
TO OUTDOOR SMALL ARMS RANGES

1. PURPOSE

This guidance establishes DoD policies for the application of environmental requirements to outdoor small arms ranges and to operations conducted at these ranges by the Military Departments, including their National Guard and Reserve components, the Unified and Specified Commands, and the Defense Agencies (hereafter referred to collectively as "DoD Components").

2. APPLICABILITY

This guidance applies to the DoD Components located within the United States and its territories.

3. TERMS AND DEFINITIONS

See Appendix A beginning on page 5.

4. REFERENCES

See Appendix B beginning on page 6 for listing of environmental laws applicable to outdoor small arms ranges.

5. POLICY

It is the policy of the Department of Defense that:

A. In general, the Resource Conservation and Recovery Act (RCRA) 40 CFR Parts 260-271 regulations do not apply to outdoor small arms ranges. Fired rounds of small caliber ammunition is considered a normal and expected use of a manufactured product and does not meet the definition of a solid waste under RCRA. Buried bullets in berms, targets, or soil at small arms ranges are also excluded. The fired rounds are not to be considered "discarded" and are not classified a "solid waste" or a "hazardous waste" under RCRA.

B. RCRA permitting and hazardous waste requirements also do not apply to berm and apron maintenance, redepositing of soils during maintenance and metals recovery operations, and recovery of metals from the berms and adjacent areas. These operations are considered routine range operating procedures and are not considered storage, treatment, or disposal under RCRA.

C. RCRA permitting and hazardous waste requirements do apply in the following instances:

(1) Contaminated soil, once removed beyond the range boundaries, that fails the Toxicity Characteristic Leaching Procedure (TCLP) or any other hazardous waste

criteria test is considered hazardous waste if the lead laden soil is not part of a material stream for recycling or is destined to be disposed of in a landfill or otherwise discarded. This waste is subject to permitting requirements if stored or treated and is also subject to land disposal restrictions if disposed of in a landfill or other land disposal facility as defined under RCRA.

(2) Wastes piles created from contaminated soil taken from berms, aprons or other contaminated range areas and any leachate generated from the waste piles. (See definition of waste pile.)

(3) Disposal, treatment, or storage of hazardous wastes conducted at small arms ranges. This includes hazardous waste brought from off site and any process that generates hazardous waste on the range.

(4) Abandoned small arms ranges are possible candidates for RCRA Corrective Action. Lead laden soil that is abandoned is considered a solid waste and therefore potentially a hazardous waste subject to RCRA requirements.

D. The Clean Water Act is applicable to releases of contamination onto small arm ranges and beyond range boundaries, into nearby water courses and ground water aquifers. Installations that are required to have a storm water permit must address small arms range discharges. The National Pollutant Discharge Elimination System (NPDES) storm water discharge permit applies only to point source conveyances such as drainage ditches and pipes.

E. The Coastal Zone Management Act applies to ranges within the coastal zone as defined by the Act. Range activities that affect land, water, or natural resources in the coastal zone, whether direct or indirect, must be consistent with State Coastal Zone Management programs.

F. The Clean Air Act applies to range metal recovery and other operations at small arms ranges if it results in the generation of significant amounts of dust and lead particulates in the air. (Check state air regulations.)

G. Installation Commanders are responsible for periodic monitoring of ranges to ensure releases of contaminants do not occur. In the event of a release of contaminants from a small arms range, the installation commander will:

- (1) notify state and/or federal regulatory agencies,
- (2) mitigate or prevent continued release, if possible,
- (3) determine if remedial action is necessary,
- (4) develop and implement a remediation plan to clean up contamination and prevent recurrence.

Mitigation and clean-up will be coordinated with State and/or Federal regulatory agencies, as necessary.

H. Abandoned small arms ranges are potential candidates for inclusion in the Defense Environmental Restoration Program.

I. Existing small arms ranges that are no longer required to support mission requirements shall be closed in a manner to protect the environment and in accordance with all applicable Federal, State and local regulations and standards.

J. Best Management Practices (BMPs) shall be implemented at each active small arms range to mitigate the migration of any contamination resulting from small arms range activities. Factors that determine migration potential of lead such as amount of lead at the range, type of soil, pH, calcium content, percentage of organic matter, and depth of closest aquifer should be considered in developing BMPs and sampling frequency. At a minimum, the BMPs shall include:

- (1) inspection/prevention of soil erosion from berms, aprons and other range areas as needed,
- (2) periodic range cleaning of the berm and adjacent areas to prevent ricochets; and to effect lead reclamation,
- (3) periodic sampling of surface water, sediment runoff, and ground water aquifers if contamination is suspected to ensure that no adverse effects on the environment are occurring,
- (4) utilize established recovery and recycling protocols to the fullest extent possible, while following standard occupational safety and health requirements,
- (5) periodic applications of agricultural lime if needed to neutralize acidic soil to prevent lead migration.

K. National Environmental Policy Act (NEPA) analysis and appropriate documentation shall be completed prior to site selection and construction of new small arms ranges and major modifications (i.e. significantly increasing range size or usage) at an existing range. Some of the environmental factors which should be considered prior to construction are:

- (1) threatened or endangered wildlife or plant species,

- (2) flood plains,
- (3) wetlands,
- (4) subsurface hydrology,
- (5) water quality,
- (6) migratory or resident fish and wildlife and habitat,
- (7) noise,
- (8) soil erosion,
- (9) air quality,
- (10) archeological and historic resources.

New range site locations must be chosen to minimize or eliminate negative impacts on the environment to the greatest extent practicable. New small arms ranges shall be designed to protect the environment by effectively using standard engineering practices to control any runoff from the ranges into nearby surface waters or ground water.

APPENDIX A

TERMS AND DEFINITIONS

Small Arms Range: A designated land or water area exclusively utilized for training or recreational use of small arms weapons (50 caliber or less) including pistols, rifles, shotguns, & machine guns. This includes skeet/trap ranges but does not include indoor ranges for the purposes of this instruction.

Berm: A mound of material (usually soil) above grade intended to capture and retain projectiles, fragments, ricochets, and debris from the use of small arms ammunition normally resulting from the conduct of live-fire weapons training.

Best Management Practices: Schedules of activities, prohibitions of practices, maintenance and operating procedures, and other management practices to enhance the recovery of lead and other metals deposited on small arms ranges.

Dispose: As defined under RCRA.

Installation: An aggregation of contiguous or near contiguous common mission supporting real property holdings under the jurisdiction of the Department of Defense controlled by a DoD component.

Hazardous Waste: As defined under RCRA.

Range Metal Recovery: The separation and segregation of lead and other metals from berm/range material for the purposes of recycling same. The metal laden soil may be sent to secondary smelters or processed on site for later smelting. The material can be reintroduced into the manufacturing process as a viable substitute for virgin materials.

Recycle: The process of reusing expended metals through separation and collection of metal fragments from backstops, berms, targets or other ranges areas to be sold for profit or to offset recovery costs.

Release of Contamination: The migration of contaminants such as lead, copper, zinc from where it was deposited into surface water channels or a ground water aquifer.

Solid Waste: As defined under RCRA. The material must be considered discarded in order to be a solid waste. (Expended ammunition being part of the normal and expected usage of the product is not considered to be a solid waste.)

Waste File: A pile of hazardous waste. This includes material made from a berm or range contaminated ground that is either abandoned or created with the intent to dispose of

the material. This does not include piles created temporarily during routine maintenance or recovery of metals from berms.

APPENDIX B

REFERENCES

1. Resource Conservation and Recovery Act of 1976 (RCRA), as amended,
2. Clean Water Act of 1987, as amended
3. Coastal Zone Management Act of 1972, as amended,
4. Clean Air Act of 1970, as amended,
5. Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended,
6. National Environmental Policy Act of 1969 (NEPA), as amended,

AMSMC-EQ (200-1a)

10 MAY 1994

MEMORANDUM FOR AMSMC-CG

SUBJECT: Draft DOD Policy, "Environmental Requirements
Applicable to Outdoor Small Arms Ranges" (CG 2308 Tasker)

1. An interim response to subject tasker is provided.
2. Paragraph 5c(2) should be expanded to state that waste piles are considered hazardous waste when abandoned or created, with the intent to discard or dispose. This will prevent waste piles created during routine maintenance from being considered hazardous waste.
3. The U.S. Army Production Base Modernization Activity, the U.S. Army Armament Research, Development and Engineering Center, and the U.S. Army Defense Ammunition Center and School have responded directly to the Headquarters, Department of the Army point of contact. The response basically has been to concur with the policy as written or with only minor changes.
4. We have requested an extension to the HQDA suspense to allow an opportunity to coordinate the draft policy with the Industrial Operations Command installations that have small arms ranges. A new suspense date has not yet been established. All comments received through this coordination will be forwarded to HQDA once they are received.
5. The POC for this action is Mr. Tony Livingston, AMSMC-EQM, extension 20082.


for ROBERT J. RADKIEWICZ 5/10
Director, Environmental Qual Dir

New York State Department of Environmental Conservation
Region 8 Office
Division of Solid and Hazardous Materials
6274 East Avon-Lima Road
Avon, New York 14414-9519

Telephone: (716) 226-2466



Michael D. Zagata
Commissioner

Renée Forgensi Davison
Regional Director

October 16, 1995

Tom Grasek
Environmental Engineer
Seneca Army Depot Activity
Route 96
Romulus, NY 14581

Dear Mr. Grasek:

Re: **Hazardous Waste Compliance Inspection Date:**
September 29, 1995
Location of Handler: Same as Above

EPA Identification Number: NYO 213820830

In order to determine compliance with the New York State Hazardous Waste Regulations, an inspection of your facility was conducted on the above referenced date.

As a result of that inspection, I believe that your facility is operating as a treater, storer and/or disposer of hazardous waste.

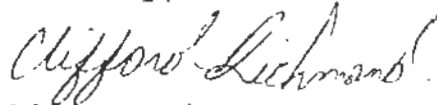
No violations of the New York State Hazardous Waste Regulations were observed on the inspection date referenced above. Please be advised that your facility is under the continuing obligation to comply with all the applicable state and federal regulations regarding the management of hazardous waste including any liability you may have for any regulatory fees and hazardous waste special assessment fees.

Should you have any questions, please contact me at the above telephone number. Your efforts to fully comply with our hazardous

Mr. Grasek
Page 2
October 16, 1995

waste regulations are appreciated. A copy of the Inspection Report is enclosed for your records.

Sincerely,

A handwritten signature in cursive script that reads "Clifford Richmond".

Clifford Richmond
Engineering Geologist

db
Enclosure

cc: S. Carlomagno
Seneca County Health Department



INSPECTION FORM

CESQG	_____
SQG	_____
GENERATOR	<u>X</u>
TSDf	<u>X</u>
OTHER	_____
UNANNOUNCED	_____
ANNOUNCED	<u>X</u>

NEW YORK STATE INDUSTRIAL HAZARDOUS WASTE MANAGEMENT ACT
(Chapter 639, Laws of 1978)

Prepared for: Commissioner
NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Send to: NYSDEC
Division of Solid and Hazardous Materials
Hazardous Waste Compliance Section
50 Wolf Road
Albany, New York 12233-7253

EPA I.D. NUMBER: N Y 0 2 1 3 8 2 0 8 3 0

COMPANY NAME (Corporate): SENECA ARMY DEPOT ACTIVITY

(Division): _____

COMPANY MAILING ADDRESS: ROUTE 96

City & State ROMULUS, NY Zip Code 14581

COMPANY LOCATION ADDRESS: _____

(if different than mailing) _____

City & State _____, NY Zip Code _____

COMPANY TELEPHONE NUMBER: (607) 869-1281 Extension _____

FULL NAME OF COMPANY CONTACT: TOM GASEK

TITLE OF COMPANY CONTACT: ENVIRONMENTAL ENGINEER

INSPECTION DATE: 09/29/ 1995 TIME OF INSPECTION: 9:15(a.m.) _____(p.m.)

INSPECTOR'S NAME: CLIFFORD RICHMOND

NAME: _____

REPORT PREPARED BY: CLIFFORD RICHMOND DATE: _____

REPORT APPROVED BY: Clifford Richmond DATE: 10-16-95

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Part I

General Information and Classification of Facility

1. Identification of Hazardous Waste - 371 Yes No
- A. Facility generates and/or stores hazardous waste on-site. X
- (1) X Company filed a RCRA hazardous waste notification and/or Part A of RCRA permit application.
- (2) X Company has used knowledge of the hazardous characteristic of the waste to determine if it is hazardous.
- (3) X Testing has shown characteristics of:
- (X) Ignitability (D001) - 371.3(b)
 - (X) Corrosivity (D002) - 371.3(c)
 - (X) Reactivity (D003) - 371.3(d)
 - (X) Toxicity (D004 - 043) - 371.3(e)
- (4) X The material is listed in the regulations as a hazardous waste from non-specific sources (F-Waste). 371.4(b).
- (5) N/A The waste is listed in the regulations as a hazardous waste from specific sources (K-Waste). 371.4(c).
- (6) N/A The material is listed in the regulations as an acute hazardous waste (P-Waste). 371.4(d)(5).
- (7) X The material or product is listed in the regulations as a discarded commercial chemical product, off-specification species or manufacturing chemical intermediate (U-Waste). 371.4(d)(6).
- (8) X The material is listed in the regulations as a waste containing PCBs (B-Waste). 371.4(e).
- B. The company notified EPA as a:
- GENERATOR AND TSDF
- Has EPA or DEC officially modified the company's status? Yes No X
If yes, attach correspondence.
- N/A

C. If the facility is a treatment, storage or disposal facility, have they:

X Submitted a Part A application.

N/A Should the Part A be modified by the Company? If so, explain.

X Submitted a Part 373 permit application.

N/A Been granted a Part B permit.* expiration date: N/A

N/A Been granted a Part 373 permit or operating under SAPA with a Part 360 permit.* expiration date: N/A

*Complete Appendix C - indicate compliance status with permit conditions.

D. N/A Is the facility operating under a consent order?**

N/A Have they signed a consent order to resolve violations found during a previous inspection?**

**Complete Appendix D and indicate compliance with each condition of the order.

2. Exemptions

A. Generator Exemptions

(1) N/A Not a regulated handler because:

(a) N/A Never generated any hazardous waste.

(b) N/A No hazardous waste generated within the last 3 years.

(c) N/A Company moved in _____ to _____.
(date) (location)

(d) N/A Company out-of-business.

(e) N/A Company sold to _____.
(new owner)

(2) N/A Samples collected for testing - 372.1(e)(5).

(3) N/A Residues of hazardous waste in empty containers - 372.1(e)(6).

(4) N/A A hazardous waste which is generated in a product or raw material storage tank, a product or raw material transport vehicle or vessel, a product or raw material pipeline, or in a manufacturing process unit or an associated non-waste treatment manufacturing unit is not subject to regulation until it exits the unit in which it was generated, unless the unit is a surface impoundment,

or unless the hazardous waste remains in the unit more than 90 days after the unit ceases to be operated for manufacturing, or for storage or transportation of product or raw materials - 372.1(e)(7)(i).

B. TSD Exemptions

- (1) X Storage of hazardous waste that is generated on-site in containers or tanks for a period not exceeding 90 days. Other than the storage of liquid hazardous waste over the designated sole source aquifers - 373-1.1(d)(1)(iii).
- (2) N/A Storage in containers or tanks of liquid hazardous waste generated on-site over the designated sole source aquifers for a period not exceeding 90 days. These storage areas must comply with the requirements of this exemption whenever any quantity of liquid hazardous waste is stored in tanks, or whenever the total quantity of liquid hazardous waste stored on-site in containers exceeds 185 gallons - 373-1.1(d)(1)(iv).
- (3) N/A The on-site storage and treatment of hazardous waste by generators that generate less than 100 kilograms of hazardous waste in any calendar month and store less than 1,000 kilograms. The conditionally exempt small quantity generator requirements listed in subdivision 371.1(f) of this Title remain applicable. If at any time the amount of hazardous waste exceeds 1,000 kilograms, this exemption does not apply. This exemption applies to the on-site storage and treatment of acute hazardous wastes only if the generator generates and stores in any calendar month such acute hazardous waste in quantities less than those listed in 373-1.1(d)(1)(i)(b) of this paragraph - 373-1.1(d)(1)(v).
- (4) N/A The storage and recycling of the recyclable materials identified in subparagraphs 371.1(g)(1)(iii) and (iv) of this Title - 373-1.1(d)(1)(vi).
- (5) N/A The storage of the following recyclable materials is exempt from permitting provided that Subpart 374-1 is complied with. (NOTE: Subpart 374-1 will require that the facility also complies with selected sections of this Part.) - 373-1.1(d)(1)(vii):
 - (a) N/A recyclable materials used in a manner constituting disposal (see section 374-1.3);
 - (b) N/A hazardous wastes burned for energy recovery in boilers and industrial furnaces that are not regulated under section 373-2.15 or 373-3.15 of this Title (see section 374-1.8);
 - (c) N/A recyclable materials from which precious metals are reclaimed (see section 374-1.6);
 - (d) N/A spent lead-acid batteries that are being reclaimed (see section 374-1.7).
- (6) N/A The recycling of hazardous wastes is exempt from permitting provided 373-2.2(c) (identification number), 372.4(b) (use of manifest system), 372.4(d)(1) (manifest discrepancies) and

clause 373-1.1(d)(1)(viii)(d) are complied with. (Storage of hazardous waste prior to recycling is not exempt under this subparagraph.) In addition: 373-1.1(d)(1)(viii):

- (a) N/A This exemption is available to:
 - (1) N/A Commercial facilities that reclaim precious metals, as defined in 374-1.6 of this Title;
 - (2) N/A Mobile or transportable commercial facilities which operate on the generator's site, if a containment area, meeting the requirements of 373-2.9(f), is provided for the reclaiming facility and any associated, temporary container holding or storage area.
- (b) N/A This exemption is not available to any units, other than boilers and industrial furnaces, that burn hazardous wastes for energy recovery.
- (c) N/A Exempted processes that recycle the hazardous wastes listed in 2B(5)(a-d) must comply with Part 374 of this Title in lieu of the requirements specified in this subparagraph. (Note: Part 374 will require that the facility also complies with selected sections of this Part.)
- (d) N/A Owners or operators of facilities subject to RCRA permitting requirements with hazardous waste management units that recycle hazardous waste are subject to the requirements of sections 373-2.27, 373-2.28, 373-3.27 and 373-3.28 of this Part.
- (7) N/A The on-site treatment of hazardous waste, by the generator, in the same tanks or containers used for accumulation and storage is exempt provided the generator complies with Part 373-1.1(d)(1)(iii) and (iv) and Part 372.2(c)(4). Any treatment or placement of hazardous waste in a manner that constitutes land disposal, as defined in subdivision 370.2(b), does not qualify for this exemption - 373-1.1(d)(1)(ix).
- (8) N/A Totally enclosed treatment facility - 373-1.1(d)(1)(xi).
- (9) N/A Elementary neutralization units or wastewater treatment units, as defined in Part 370 of this Title, other than units that are part of commercial hazardous waste management facilities as defined in Part 370 of this Title. Elementary neutralization units and wastewater treatment units located at commercial hazardous waste management facilities that are only used to neutralize or treat hazardous waste resulting from the recycling of hazardous wastes or from the reclamation of precious metals from hazardous wastes are also exempt. Elementary neutralization units and wastewater treatment units that are used to commercially neutralize or treat hazardous wastes, generated only at geographically continuous sites, and transported via dedicated pipeline are also exempt - 373-1.1(d)(1)(xii).

(10) N/A Accumulation areas are exempt, provided that they are used to accumulate waste in accordance with the requirements of subparagraph 372.2(a)(8)(i) of this Title - 373-1.1(d)(1)(xiv).

(11) N/A A transporter storing manifested shipments of hazardous waste in containers meeting the requirements of paragraph 372.2(a)(4) of this Title at a transfer facility for a period of ten calendar days or less is exempt, provided that the transfer facility is not located on the site of any commercial hazardous waste treatment, storage or disposal facility subject to permitting under this Part. Complete Part VII - 373-1.1(d)(1)(xi).

3. Hazardous Waste Generation/Treatment/Storage/Disposal

A. Describe only the activities that result in the generation of hazardous waste. Include manufacturing processes that generate hazardous waste. [Do not include hazardous waste treatment processes.]

WASTE STREAMS GENERATED FROM MAINTENANCE OF EQUIPMENT

("REWORK") DECOMMISSIONING OF PCB EQUIPMENT, PAINTING - D001,

F002, F005, D008, D018, D039, D040. SYSTEMATIC CLOSING/

CLEANING OF BUILDINGS YIELDING U-CODE WASTES. *SEE ATTACHMENT A FOR FULL LIST.

B. Describe any on-site hazardous waste treatment processes that result in the generation of hazardous waste (exempt and/or nonexempt). Include process diagrams if available.

N/A

C. Identify the hazardous wastes that are on-site, the quantity of each, the storage method, the type and size of containers or tanks used and their location in the storage area. (Be as specific as possible.)

(1) Accumulation Areas [NOTE: Waste in accumulation areas must be included as part of the total quantity of waste on-site]:

N/A

(2) Container Storage Areas for CESQG, SQG or Generator*

N/A

(3) Tank Storage Areas for CESQG, SQG or Generator*

N/A

- * CESQG - unlimited storage time provided less than 1,000 kg is stored on-site.
- SQG - 180 days (or 270 if TSD is over 200 miles away) and less than 6,000 kg is stored on-site.
- Generator - 90 days or less storage.

(4) Interim Status/Permitted Container Storage Areas:

BLDG. 301: (1) 10-GALLON STEEL DRUM OF PCB-CONTAINING

BALLASTS;

BLDG. 307 - EMPTY;

SEE "ATTACHMENT B" FOR LIST OF MIXED WASTE IN

BLOG. 803.

(5) Interim Status/Permitted Tank Storage Areas:

N/A

- (6) Any other treatment, storage or disposal units such as lagoons, surface impoundments, landfills, waste piles, incinerators, energy recovery units, or underground injection units:

N/A

4. Status Identification:

A. Generator Status

- (1) ___ Conditionally Exempt Small Quantity Generator (CESQG) - generates less than 100 kg/mo of non-acute hazardous waste or 1 kg/mo of acute hazardous waste. Complete Part III - 372.1(f)(6), 371.1(f)(7).
- (2) ___ Small Quantity Generator (SQG) - generates more than 100 kg/mo but less than 1,000 kg/mo of non-acute hazardous, and accumulates no more than 6,000 kg of non-acute hazardous waste on-site. Complete Part IV - 372.2(a)(8)(iii).
- (3) X Generator - generates more than 1,000 kg/mo of non-acute hazardous waste or generates more than 1 kg of acute hazardous waste in a calendar month. Complete Part V - 372.2(a)(8)(ii).

B. Treatment, Storage or Disposal Facility (TSDF)

- (1) X Hazardous waste is stored greater than 90 days.*,**
- (2) N/A Hazardous waste is received from off-site and not beneficially used, reused or legitimately recycled or stored.*
- (3) X Hazardous waste is treated on-site in non-exempt units.*
- (4) N/A Hazardous waste is disposed of on-site.*

* (If checked Complete Part VI and/or appropriate Appendices)

** (Do not complete for generators only that have exceeded the 90 day storage limit.)

C. Transporter Status

Yes ___ No ___ Hazardous waste is transported by this company.

If Yes, Complete Part VII

Permit No. _____

Part V

LARGE QUANTITY GENERATOR

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

The generator who generates 1,000 kilograms or more per month of non-acute hazardous waste or generates greater than 1 kg per month of acute hazardous waste has complied with the following:

1. General Requirements

- (a) ___ The generator has made a determination as to whether or not his solid waste is a hazardous waste - 372.2(a)(2). X
- (b) ___ The generator has obtained an EPA identification number - 372.2(a)(3). X
- (c) ___ Before transporting or offering hazardous waste for * transportation off-site the generator has packaged the waste in accordance with the applicable USDOT regulations - 372.2(a)(4). N/A
- (d) ___ Before transporting or offering hazardous waste for * transportation off-site the generator has labeled each package of waste in accordance with the applicable USDOT regulations - 372.2(a)(5). N/A
- (e) ___ Before transporting or offering hazardous waste for * transportation off-site the generator has marked each container or package of waste properly - 372.2(a)(6). N/A

* Note: This does not apply to drums in storage.

2. Accumulation Area Requirements - 372.2(a)(i)

- (a) ___ The containers appear to be in good condition and are not in danger of leaking - 373-3.9(b). N/A
- (b) ___ Hazardous waste is stored in containers made of compatible materials - 373-3.9(c). N/A
- (c) ___ All containers except those in use are closed - 373-3.9(d)(1). N/A
- (d) ___ Containers holding hazardous waste must not be opened, handled or stored in a manner which may rupture the containers or cause them to leak - 373-3.9(d)(2). N/A
- (e) ___ Containers are marked with the words "Hazardous Waste" and with other words that identify the contents of the containers - 372.2(a)(8)(i)(a)(2). N/A

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

- (f) ___ Hazardous waste may be accumulated in excess of 55 gallons or 1 quart of acutely hazardous waste at or near the point of generation provided that Section 372.2(a)(8)(ii) requirements are met within 3 days, and the container holding the excess accumulation is marked with the date the excess amount began accumulating - 372.2(a)(8)(i)(b). N/A

3. 90 Day Storage - 372.2(a)(8)(ii)

- (a) ___ All wastes are shipped off-site to an authorized treatment, storage or disposal facility (TSDF) in 90 days or less - 372.2(a)(8)(ii). N/A
- (b) ___ The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container - 372.2(a)(8)(ii), 373-1.1(d)(1)(iii)(c)(2), 373-1.1(d)(1)(iv)(d). N/A

Container Storage Requirements (This section will also be completed for TSDF's as referred from Part VI.)

- (c) ___ The containers appear to be in good condition and are not in danger of leaking. (If containers are leaking, describe the type, condition, contents and number that are leaking or corroded. Be detailed and specific) - 373-3.9(b). N/A

- (d) ___ Hazardous waste is stored in containers made of compatible materials - 373-3.9(c). (If not, please explain.) N/A

- (e) ___ All containers except those in use are closed - 373-3.9(d)(1). N/A

- (f) ___ Containers holding hazardous waste must not be opened, handled or stored in a manner which may rupture the containers or cause them to leak - 373-3.9(d)(2). N/A

- (g) ___ Each container is marked with the words "Hazardous Waste" and with other words to identify the contents - 373-3.9(d)(3). N/A

- (h) ___ The containers and storage area are inspected at least weekly - 373-3.9(e). N/A

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

- (i) ___ The generator complies with the following special requirements related to storage of ignitable or reactive wastes - 373-3.9(f): N/A
- (1) ___ Containers holding ignitable or reactive waste are located at least 15 meters (50 feet) from the facility property line - 373-3.9(f). N/A
- (2) ___ Generator has taken precautions to prevent accidental ignition or reaction of ignitable or reactive waste by separating and protecting such waste from sources of ignition or reaction - 373-3.2(h)(1). N/A
- (3) ___ Generator has placed "No Smoking" signs conspicuously wherever there is a hazard from ignitable or reactive waste - 373-3.2(h)(1). N/A
- (j) ___ The generator complies with the following special requirements related to incompatible wastes - 373-3.9(g): N/A
- (1) ___ Incompatible wastes, or incompatible wastes and materials, are not placed in the same container, or in an unwashed container that previously held an incompatible waste or material unless the placement is conducted to prevent the following - 373-3.9(g)(1) & (2): N/A
- (a) ___ the generation of extreme heat or pressure, fire or explosion, or violent reaction - 373-3.2(h)(2)(i); N/A
- (b) ___ production of uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to pose a risk of fire or explosions - 373-3.2(h)(2)(ii); N/A
- (c) ___ production of uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions - 373-3.2(h)(2)(iii); N/A
- (d) ___ damage to the structural integrity of the device or facility containing the waste - 373-3.2(h)(2)(iv); or N/A
- (e) ___ a threat to human health or the environment - 373-3.2(h)(2)(v). N/A
- (2) ___ Containers holding a hazardous waste that is incompatible with any waste or other materials stored nearby in other containers, piles, open tanks, or surface impoundments must be separated from the other materials or protected from them by means of a dike, berm, wall, or other device - 373-3.9(g)(3). N/A
- (k) ___ Special requirements for generators of liquid hazardous waste over sole source aquifers or generators that store more than 8,800 gallons of liquid Zazardous waste - 373-1.1(d)(1)(iii), 373-1.1(d)(1)(iv). N/A

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

- (1) ___ The container storage areas are within a secondary containment system designed and operated in accordance with the following* - 373-1.1.(d)(1)(iv)(f): N/A
- (a) ___ The base under the containers must be free of cracks or gaps and sufficiently impervious to contain collected material until it is removed - 373-2.9(f)(1)(i). N/A
- (b) ___ The base must be sloped or the containment system otherwise designed and operated to drain and remove liquid unless the containers are elevated or protected from contact with accumulated liquids - 373-2.9(f)(1)(ii). N/A
- (c) ___ The containment system must have sufficient capacity to contain 10 percent of the volume of containers or the volume of the largest container, whichever is greater. Containers that do not contain free liquids are not considered in this determination - 373-2.9(f)(1)(iii). N/A
- (d) ___ Run-on is prevented unless the system has sufficient excess capacity over that required in (3) - 373-2.9(f)(1)(iv). N/A
- (e) ___ Accumulated waste and precipitation must be removed as necessary to prevent overflow - 373-2.9(f)(1)(v). N/A

* This requirement does not apply to generators of liquid hazardous waste over a sole source aquifer if the container storage volume does not exceed 185 gallons.

- (2) ___ The generator of liquid hazardous waste over a sole source aquifer has a written closure plan - 373-3.7(c)(1). N/A
- (3) ___ The closure plan identifies the steps necessary to perform partial and/or final closure of the facility at any point during its active life. The closure plan must contain the information required by 373-3.7(c)(2)(i) - (vii)** - 373-3.7(2)(c). N/A

** If a violation is checked, please attach a sheet listing the deficiencies in the closure plan.

4. Tank Storage Requirements - 373-3.10

1. ___ Generators must complete Appendix E*, except for 373-3.10(h)(3) Items 11C1 through 5. In addition, 373-3.7 and 3.8 which are cross-referenced do not apply except for 373-3.7(b) and (e).
2. ___ Generators over sole-source aquifers complete Appendix E, except for 373-3.10(h)(3), Items 11C1 through 5 and 373-3.8 (financial requirements).

* Note: Generators storing less than 185 gal of liquid hazardous waste in tanks, do not have to comply with secondary containment requirements given in Appendix E (Pages E-7 to E-10).

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

5. Manifest, Reporting and Recordkeeping Requirements

(a) Hazardous waste is shipped off-site with an accompanying manifest - 372.2(b)(5)(i). X

If "violation" is checked, please elaborate.

N/A

(b) List the frequency of shipments and the amount of waste per shipment.

VARIES

(c) The transporter has a valid Part 364 permit or is otherwise authorized to transport the waste to the designated facility - 372.2(b)(5)(ii). X

List transporter and permit number.

NORTHEAST ENVIRONMENTAL SERVICES, INC. 7A215
SAFETY-KLEEN CORP. IL027

(d) The generator offers for shipment or ships hazardous waste to an authorized facility. - 372.2(b)(5)(iii). X
If violation, list names of any unauthorized facilities.

N/A

(e) Each manifest is completed in accordance with the instructions found in Appendix 30 of Part 372 - 372.2(b)(1). [Indicate items in violation]

	Generator	Trans 1	Trans 2	TSDf	
(1) <input type="checkbox"/> Name of	<u>X</u>	<u>X</u>	<u> </u>	<u>X</u>	<u>X</u>
(2) <input type="checkbox"/> EPA ID No. of	<u>X</u>	<u>X</u>	<u> </u>	<u>X</u>	<u>X</u>
(3) <input type="checkbox"/> Mailing Address of	<u>X</u>	<u> </u>	<u> </u>	<u>X</u>	<u>X</u>
(4) <input type="checkbox"/> Telephone No. of	<u>X</u>	<u>X</u>	<u> </u>	<u>X</u>	<u>X</u>
(5) <input type="checkbox"/> Manifest Document #	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u>X</u>
(6) <input type="checkbox"/> The proper USDOT description.	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u>N/A</u>

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

- (7) The appropriate: X quantity, X container number, X container type, and X waste type by units of weight or volume. X
- (8) Signed certification that the materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation under regulations of the USDOT and NYSDEC. X
- (f) The generator has received signed copies (from the TSD facility) of all manifests for wastes shipped off-site more than 35 days ago: X
- If not, exception reports have been submitted covering these shipments - 372.2(c)(3). N/A
- (g) The generator must distribute copies of the manifest as specified on the manifest form, postmarked within five (5) business days of the shipment date - 372.2(b)(3). X
- (h) For international shipments the generator has done the following - 372.2(b)(4)(i):
- (1) The EPA and the Department have been notified 60 days prior to shipment of the hazardous waste destined for treatment, storage or disposal outside the United States - 372.5(c)(1). N/A
- (2) Delivery of the wastes has been confirmed by the consignee within 90 days of acceptance by initial transporter - 372.5(e)(2). N/A
- (3) Primary exporters of hazardous waste must file with the Administrator and the Department no later than March 1 of each year, a report summarizing the types, quantities, frequency, and ultimate destination of all hazardous waste exported during the previous calendar year - 372.5(f)(1). N/A
- (i) The generator has complied with the requirements of Section 372.6 for interstate shipments - 372.2(b)(4)(ii). X
- (j) The generator has complied with the requirements for shipping by rail or water (bulk) found in Section 372.7 - 372.2(b)(4)(iii). N/A
- (k) A copy of each manifest has been kept for at least three years from the date the waste was accepted by the initial transporter - 372.2(c)(1)(i). X
- (l) A copy of each Annual Report and Exception Report must be kept for a period of at least three years from the due date of the report - 372.2(c)(1)(ii). X

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

- (m) ___ A generator must keep records of any test results, waste analyses, or other determinations made in accordance with Part 372.2(a)(2) for at least three years - 372.2(c)(1)(iii). X
- (n) ___ All records required under subdivision 372.2(c) were furnished upon request, or made available at a reasonable time for inspection - 372.2(c)(1)(iv). X
- (o) ___ There is written communication that the designated treatment, storage or disposal facility is an authorized treatment, storage or disposal facility for the particular wastes being offered for shipment and has capacity to accept the hazardous waste set forth on the manifest and will assure the ultimate disposal method is followed - 372.2(b)(2)(i). X
- (p) ___ There is written communication that the designated transporter is authorized to deliver the waste to the facility on the manifest - 372.2(b)(2)(ii). X
- (q) ___ A generator who ships hazardous waste off-site to a treatment, storage or disposal facility located within the United States must submit an Annual Report on forms specified by the Commissioner - 372.2(c)(2). X

6. Personnel Training - 373-3.2(g)

- (a) ___ The following documents and records are maintained at the facility - 373-3.2(g)(4): X
- (1) ___ the job title for each position at the facility related to hazardous waste management and name of the employee filling each job - 373-3.2(g)(4)(i); X
- (2) ___ a written job description for each position - 373-3.2(g)(4)(ii); X
- (3) ___ a written description of the type and amount of both introductory and continuing training that will be given to each person related to hazardous waste management - 373-3.2(g)(4)(iii); and X
- (4) ___ records that document that the training or job experience required has been given to and completed by facility personnel - 373-3.2(g)(4)(iv). X
- (b) ___ The training program is directed by a person trained in hazardous waste management procedures and must include instruction which teaches facility personnel hazardous waste management procedures (including _____) X

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

contingency plan implementation) relevant to the positions in which they are employed. The components are - 373-3.2(g)(1)(i), (ii) and (iii):

- (1) Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment; X
- (2) Key parameters for automated waste feed cutoff systems; N/A
- (3) Communications or alarm systems; X
- (4) Response to fires and explosions; X
- (5) Response to groundwater contamination incidents; and N/A
- (6) Shutdown of operations. X
- (c) Facility personnel have successfully completed the program by the effective date of these regulations or six months after the date of their employment - 373-3.2(g)(2). X
- (d) Facility personnel have taken part in an annual review of the initial training required - 373-3.2(g)(3). X
- (e) Training records on current personnel have been kept permanently at the facility (until closure) - 373-3.2(g)(5). X
- (f) Training records on former employees have been kept for at least three years from the date the employee last worked at the facility - 373-3.2(g)(5). X

7. Preparedness and Prevention - 373-3.3

- (a) The facility is maintained and operated to minimize the possibility of a fire or explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water - 373-3.3(b). X
- (b) The facility must be equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment specified below - 373-3.3(c): X
 - (1) An internal communication or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel - 373-3.3(c)(1); X

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

- (2) ___ A device, such as a telephone (immediately available at the scene of operations) or a hand-held, two-way radio capable of summoning emergency assistance from local police departments, fire departments, or State or local emergency response teams - 373-3.3(c)(2); X
- (3) ___ Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment - 373-3.3(c)(3); and X
- (4) ___ Water at adequate volume and pressure to supply water hose streams, or foam-producing equipment, or automatic sprinklers, or water spray systems - 373-3.3(c)(4). X
- (c) ___ Facility communications or alarm systems, fire protection equipment, and spill control equipment are tested and maintained as necessary to assure their proper operation in time of emergency - 373-3.3(d). X
- (d) ___ Personnel involved in hazardous waste operations have immediate access to an internal alarm or emergency communication device - 373-3.3(e). X
- (e) ___ The owner or operator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency unless aisle space is not needed for any of these purposes - 373-3.3(f). X
- (f) ___ The facility owner or operator has attempted to make the following arrangements as appropriate with local authorities for the type of waste handled at the facility and the potential need for the services of these organizations - 373-3.3(g)(1): N/A*
- (1) ___ Arrangements to familiarize police, fire departments and emergency response teams with the functions and layout of the facility - 373-3.3(g)(1)(i); N/A
- (2) ___ Where more than one police and fire department might respond to an emergency, an agreement designating primary emergency authority to a specific police and a specific fire department, and agreements with any others to provide support to primary emergency authority - 373-3.3(g)(1)(ii); N/A
- (3) ___ Agreements with State emergency response teams, emergency response contractors, and equipment suppliers - 373-3.3(g)(1)(iii); and N/A
- (4) ___ Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could N/A

*Facility responds with own emergency/spill/fire teams.

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

result from fires, explosions or releases at the facility - 373-3.3(g)(1)(iv).

(g) Where state or local authorities decline to enter into such arrangements, the owner or operator has documented the refusal in the operating record - 373-3.3(g)(2). N/A

8. Contingency Plan - 373-3.4

(a) The facility has a contingency plan or some other emergency plan which incorporates hazardous waste management - 373-3.4(b)(1). X

(b) If the facility has a Spill Prevention, Control, and Countermeasure Plan (SPCC) or some other emergency plan, that plan need only be modified to incorporate hazardous waste management provisions that are sufficient to comply with the Contingency plan requirements - 373-3.4(c)(2). X

(c) The following are included in the contingency plan - 373-3.4(c): X

(1) A description of the actions facility personnel must take in response to fires, explosions or any unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil or surface water; 373-3.4(c)(1). X

(2) A description of arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services; 373-3.4(c)(3). X

(3) Names, addresses and office and home phone numbers of all persons qualified to act as emergency coordinator; 373-3.4(c)(4). X

(4) An up-to-date list of all emergency equipment at the facility, and decontamination equipment, where this equipment is required; 373-3.4(c)(5). X

(5) The location and a physical description of each item on the list, and a brief outline of its capabilities; 373-3.4(c)(5). X

(6) An evacuation plan for facility personnel, where there is a possibility that evacuation could be necessary - 373-3.4(c)(6). X

(c) Copies of the contingency plan are maintained at the facility - 373-3.4(d)(1). X

(d) Copies of the contingency plan have been submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams N/A

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

that may be called upon to provide emergency services - 373.3.4(d)(2).

(e) ___ The contingency plan has been amended, as necessary, when applicable regulations were revised, the plan failed in an emergency, the facility changes or the list of emergency coordinators or equipment changes - 373-3.4(e). X

(f) ___ There is at least one employee either on the facility premises or on call with the responsibility and authority for coordinating all emergency response measures. This emergency coordinator must be thoroughly familiar with all aspects of the contingency plan, all operations and activities, the facility layout, the location and characteristics of all wastes handled and the location of all records - 373-3.4(f). X

9. Emergency Procedures - 373-3.4(g)

(a) ___ During a past emergency situation the emergency coordinator (or his designee when the emergency coordinator is not on call) immediately activated emergency procedures - 373-3.4(g).* N/A

*Do not go back further than the previous inspection date.

(b) ___ The following was done:

(1) ___ Activated internal facility alarms or communication systems; N/A

(2) ___ Notified appropriate state or local agencies; N/A

(3) ___ Immediately identified the character, exact source, amount and areal extent of any released materials; N/A

(4) ___ The emergency coordinator assessed possible hazards to human health and the environment; N/A

(5) ___ The emergency coordinator, after determining that the facility had a release, fire or explosion which could threaten human health or the environment outside the facility, reported his findings; N/A

(6) ___ During the emergency, the emergency coordinator took all reasonable measures necessary to ensure that fire, explosions and releases do not occur, recur or spread to other hazardous waste; N/A

(7) ___ The emergency coordinator monitored for leaks, pressure buildup, gas generation or ruptures in valves, pipes or other equipment, where appropriate during the facility's response to the emergency; N/A

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

- (8) ___ The emergency coordinator provided for treating, storing or disposing of recovered waste, contaminated soil or surface water, or any other material that resulted from a release, fire or explosion at the facility; N/A
- (9) ___ The emergency coordinator ensured that in the affected area no waste that may be incompatible with the released material was treated, stored or disposed of until cleanup procedures were completed; N/A
- (10)___ The emergency coordinator ensured that all emergency equipment listed in the contingency plan was cleaned and fitted for its intended use before operations were resumed; N/A
- (11)___ The owner or operator notified the Commissioner that the facility is in compliance with Part 373-3.4(g)(8) before operations were resumed in the affected areas of the facility; N/A
- (12)___ The owner or operator noted in the operating record the time, date and details of the incident that required implementation of the contingency plan; N/A
- (13)___ The owner or operator submitted a complete written report on the incident within 15 days after the incident occurred. N/A

Part VI

Interim Status Treatment, Storage and Disposal Facility (TSDF)

(This Part does not apply to permitted facilities. For permitted facilities, complete Appendix C.)

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

1. Required Notices - 373-3.2(c)

- A. The owner or operator of a facility that has arranged to receive hazardous waste from a foreign source has complied with section 372.5 of this Title - 373-3.2(c)(1). N/A
- B. Before transferring ownership or operation of a facility during its operating life, or of a disposal facility during the post-closure care period, the owner or operator notified the new owner or operator in writing of the requirements - 373-3.2(c)(2). N/A

2. General Waste Analysis - 373-3.2(d)

- A. Before treatment, storage, or disposal of any hazardous waste, the owner or operator obtained a detailed chemical and physical analysis of a representative sample of the waste. At a minimum, this analysis must contain all the information which must be known to treat, store, or dispose of the waste in accordance with the requirements of this Subpart and 6NYCRR Part 376 - 373-3.2(d)(1)(i). X
- B. The analysis included data developed under 6NYCRR Part 371 and existing published or documented data on the hazardous waste or on waste generated from similar processes - 373-3.2(d)(1)(ii). X
- C. The analysis has been repeated as necessary to ensure that it is accurate and up-to-date - 373-3.2(d)(1)(iii). X
- D. The owner or operator of an off-site facility must inspect and, if necessary, analyze each hazardous waste movement received at the facility to determine whether it matches the identity of the waste specified on the accompanying manifest or shipping paper - 373-3.2(d)(1)(iv). N/A
- E. The owner or operator has developed and followed a written waste analysis plan - 373-3.2(d)(2). X
- F. The owner or operator keeps this plan at the facility - 373-3.2(d)(2). X

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

G. ___ The plan specifies, at a minimum:

1. ___ The parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters - 373-3.2(d)(2)(i). X
2. ___ The test methods which will be used to test for these parameters - 373-3.2(d)(2)(ii). X
3. ___ The sampling method which will be used to obtain a representative sample of the waste to be analyzed - 373-3.2(d)(2)(iii). X
4. ___ The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date - 373-3.2(d)(2)(iv). X
5. ___ For off-site facilities, the waste analyses that hazardous waste generators have agreed to supply - 373-3.2(d)(2)(v). N/A
6. ___ Where applicable, the methods which will be used to meet the additional waste analysis requirements for specific waste management methods as specified in Part 373-3 and 376.1(g) - 373-3.2(d)(2)(vi). X
7. ___ For surface impoundments exempted from land disposal restrictions under 376.1(d)(1), the procedures and schedule for:
 - (a) ___ the sampling of impoundment contents 373-3.2(d)(2)(vii)(a). N/A
 - (b) ___ the analysis of test data - 373-3.2(d)(2)(vii)(b). N/A
 - (c) ___ the annual removal of residues which are not delisted and exhibit a characteristic of hazardous waste or which do not meet the treatment standards in 376.4 of this title - 373-3.2(d)(2)(vii)(c). N/A
8. ___ For off-site facilities the waste analysis plan required must also specify the procedures which will be used to inspect and, if necessary, analyze each movement of hazardous waste received at the facility to ensure that it matches the identity of the waste designated on the accompanying N/A

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

manifest or shipping paper. The plan describes, at a minimum:

- (a) The procedures which will be used to determine the identity of each movement of waste managed at the facility - 373-3.2(d)(3)(i); and N/A
- (b) The sampling method which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling - 373-3.2(d)(3)(ii). N/A
- (c) The procedures that the owner or operator of an off-site landfill receiving containerized hazardous waste will use to determine whether a hazardous waste generator or treater has added a biodegradable sorbent to the waste in the container - 373-3.2(d)(3)(iii). N/A

3. Security - 373-3.2(e)

A. The owner or operator must prevent the unknowing entry, and minimize the possibility for the unauthorized entry, of persons or livestock onto the active portion of his facility, because:

- 1. physical contact with the waste, structures or equipment within the active portion of the facility will injure unknowing or unauthorized persons or livestock which may enter the active portion of a facility - 373-3.2(e)(1)(i) AND YES NO
- 2. disturbance of the waste or equipment, by the unknowing or unauthorized entry of persons or livestock onto the active portion of a facility, will cause a violation of the requirements - 373-3.2(e)(1)(ii). YES NO

B. If yes is checked under A1 and A2 above, the facility must have the following:

- 1. A 24-hour surveillance system which continuously monitors and controls entry onto the active portion of the facility - 373-3.2(e)(2)(i) OR
- 2. An artificial or natural barrier which completely surrounds the active portion of the facility - 373-3.2(e)(2)(iii)(a); AND

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

3. ___ A means to control entry, at all times, through the gates or other entrances to the active portion of the facility - 373-3.2(e)(2)(ii)(b). X
4. ___ A sign with the legend, "Danger - Unauthorized Personnel Keep Out" posted at each entrance to the active portion of the facility, and at other locations, in sufficient numbers to be seen from any approach to the active portion (not needed if owner or operator is exempt under A1 and A2 above) - 373-3.2(e)(3). X
5. General Inspection Requirements - 373-3.2(f)
- A. ___ The owner or operator has inspected the facility for malfunctions and deterioration, operator errors, and discharges which may be causing or may lead to release of hazardous waste constituents to the environment, or a threat to human health hazards - 373-3.2(f)(1). X
- B. 1. ___ The owner or operator has developed and followed a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment (such as dikes and sump pumps) that are important to preventing, detecting, or responding to environmental or human health hazards - 373-3.2(f)(2)(i). X
2. ___ The written inspection schedule is kept at the facility - 373-3.2(f)(2)(ii). X
3. ___ The schedule identifies the type of problems which are to be looked for during the inspection - 373-3.2(f)(2)(iii). X
4. ___ The frequency of inspection is based on the rate of possible deterioration of the equipment and the probability of an environmental or human health incident, if the deterioration, or malfunction, or any operator error goes undetected between inspections. Areas subject to spills, such as loading and unloading areas, must be inspected daily when in use. At a minimum, the inspection schedule must include the items and frequencies called for in other sections of Part 373 dealing with treatment, storage and disposal activities - 373-3.2(f)(2)(iv). X
- C. ___ The owner or operator has remediated any deterioration or malfunction of equipment or structures which the inspection has revealed - 373-3.2(f)(3). X
- D. ___ The owner or operator has recorded inspections in an inspection log or summary - 373-3.2(f)(4). X

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

- E. The inspection log or summary has been kept for at least three years from the date of inspection - 373-3.2(f)(4). X
- F. The records, at a minimum, include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or remedial actions - 373-3.2(f)(4). X
6. Container Storage Requirements - Complete Part V, Items 3(c) thru 3(j). (pgs. V-2 and V-3), as applicable.
7. Personnel Training - Complete Part V, Item 6 (pgs. V-7 and V-8).
8. Preparedness and Prevention - Complete Part V, Item 7 (pgs. V-8 through V-10).
9. Contingency Plan and Emergency Procedures - Complete Part V, Items 8 and 9 (pgs. V-10 through V-12).
10. Manifest, Recordkeeping and Reporting - Complete Part V, Item 5 (pgs. V-5 through V-7). NOTE: These questions apply only to TSD's that ship hazardous waste off-site.
11. Operating Record - 373-3.5(c)
- A. The owner or operator has kept a written operating record at his facility - 373-3.5(c)(1). X
- B. The following information is included in the operating record, as it becomes available, and maintained in the operating record until closure of the facility - 373-3.5(c)(2):
1. A description and the quantity of each hazardous waste received, and the method(s) and date(s) of its treatment, storage or disposal at the facility - 373-3.5(c)(2)(i); X
2. The location of each hazardous waste within the facility and the quantity at each location - 373-3.5(c)(2)(ii); X
3. (For disposal facilities). The location and quantity of each hazardous waste must be recorded on a map or diagram of each cell or disposal area - 373-3.5(c)(2)(ii); N/A
4. Information must include cross references to specific manifest document numbers, if the waste was accompanied by a manifest - 373-3.5(c)(2)(ii); N/A

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

- | | | |
|---------|---|------------|
| 5. ___ | Records and results of waste analyses and trial tests performed - 373-3.5(c)(2)(iii); | <u>X</u> |
| 6. ___ | Summary reports and details of all incidents that require implementing the contingency plan - 373-3.5(c)(2)(iv); | <u>N/A</u> |
| 7. ___ | Records and results of inspections as required by 373-3.2(f) - 373-3.5(c)(2)(v); | <u>X</u> |
| 8. ___ | Monitoring, testing or analytical data where required - 373-3.5(c)(2)(vi); | <u>X</u> |
| 9. ___ | All closure cost estimates. (Does not apply to generators over sole source aquifer and State or Federal facilities) - 373-3.5(c)(2)(vii); | <u>X</u> |
| 10. ___ | (For disposal facilities). All post-closure cost estimates - 373-3.5(c)(2)(vii); | <u>N/A</u> |
| 11. ___ | Records of the quantities (and date of placement) for each shipment of hazardous waste placed in land disposal units under an extension to the effective date of any land disposal restriction granted by the Commissioner - 373-3.5(c)(2)(viii); | <u>N/A</u> |
| 12. ___ | Monitoring data required pursuant to a petition; 373-3.5(c)(2)(viii); | <u>N/A</u> |
| 13. ___ | The applicable notice required by a generator under 376.1(g), [waste analysis and recordkeeping] - 373-3.5(c)(2)(viii); | <u>X</u> |
| 14. ___ | For an off-site treatment facility, a copy of the notice, and the certification and demonstration if applicable, required by the generator or the owner or operator under 376.1(g) - 373-3.5(c)(2)(ix); | <u>X</u> |
| 15. ___ | For an on-site treatment facility, the information contained in the notice (except the manifest number), and the certification and demonstration if applicable, required by the generator or the owner or operator under 376.1(g) - 373-3.5(c)(2)(x); | <u>X</u> |
| 16. ___ | For an off-site land disposal facility, a copy of the notice, and the certification and demonstration, if applicable, required by the generator or the owner or operator of a treatment facility under 376.1(g) - 373-3.5(c)(2)(xi); | <u>X</u> |

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

17. ___ For an on-site land disposal facility, the information contained in the notice (except the manifest number), and the certification and demonstration if applicable, required by the generator or the owner or operator of a treatment facility under 376.1(g) - 373-3.5(c)(2)(xii); N/A
18. ___ For an off-site storage facility, a copy of the notice and the certification and demonstration if applicable, required by the generator or the owner or operator under 376.1(g) - 373-3.5(c)(2)(xiii); and N/A
19. ___ For an on-site storage facility, the information contained in the notice (except the manifest number), and the certification and demonstration if applicable, required by the generator or the owner or operator of a treatment facility under 376.1(g) - 373-3.5(c)(2)(xiv). N/A
12. Manifest - 373-3.5(b) (NOTE: This section applies only to TSD operations that receive hazardous waste from off-site.)
- A. Upon receipt of manifested shipment of hazardous waste the owner or operator:
1. ___ checked for significant discrepancies in quantities from those stated on the manifest - 373-3.5(b)(1)(i)(a). N/A
2. ___ determined that all portions of the manifest have been completed - 373-3.5(b)(1)(i)(b). N/A
3. ___ distributed copies of the manifest according to the instructions with the manifest form - 373-3.5(b)(1)(iv). N/A
- B. Upon receipt of an unmanifested shipment of hazardous waste the owner or operator:
1. ___ determined the reason why the shipment was not accompanied by a manifest - 373-3.5(b)(2)(i). N/A
2. ___ filed an unmanifested waste report after accepting the waste transported by a rail or water transporter and manifest is not received within seven days of the shipment - 373-3.5(b)(2)(iii). N/A
- C. ___ Facility accepted a particular hazardous waste without an authorized permit to do so - 373-3.5(b)(5)(i). N/A
- D. ___ Facility accepted a hazardous waste without having adequate treatment, storage or disposal capacity available - 373-3.5(b)(5)(ii). N/A

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

13. Availability, Retention and Disposition of Records

- A. All records, including plans, required under Part 373-3 are kept at the facility and furnished upon request, and made available at all reasonable times for inspection - 373-3.5(d)(1). X
- B. All reports and records required under subdivision 373-3.5(b)(3) were retained for three years from the date of submittal - 373-3.5(b)(3)(iii)(a). X
- C. Upon closure of the facility, a copy of records of waste disposal locations and quantities was submitted to the Commissioner and local Land Authority - 373-3.5(d)(3). N/A

14. Additional Reports

- A. A TSDF Annual Report has been submitted to the Department by March 1 of each year - 373-3.5(e). X
- B. Releases, fires and explosions as specified in paragraph 373-3.4(g)(10) - 373-3.5(g)(1). N/A
- C. Groundwater contamination and monitoring data as specified in subdivisions 373-3.6(d) and 373-3.6(e) - 373-3.5(g)(2). N/A
- D. Facility closure as specified in subdivision 373-3.7(f) - 373-3.5(g)(3). N/A

15. Groundwater Monitoring - 373-3.6

- A groundwater monitoring program is required for surface impoundments, landfills, or land treatment facilities and has been implemented - 373-3.6(a)(1). N/A

GROUNDWATER MONITORING QUESTIONNAIRE

APPENDIX Q WILL BE COMPLETED BY GEOLOGIST

16. Closure and Post-Closure - 373-3.7

- A. The owner or operator has a written closure plan. Until final closure is completed and certified, a copy of the most current plan must be furnished to the Commissioner upon request. In addition, for facilities without approved plans it must be provided during site inspections, on the day of inspection, to any authorized Department representative - 373-3.7(c)(1). X

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

- B. ___ The owner or operator must amend the closure plan whenever changes in operating plans or facility design affect the closure plan, there is a change in the expected year of closure, or in conducting partial or final closure activities, unexpected events require a modification of the closure plan - 373-3.7(c)(3)(i). N/A
- C. ___ The owner or operator of a hazardous waste disposal unit must have a written post-closure plan - 373-3.7(h)(1). N/A
- D. ___ Within 60 days of completion of final closure of the facility or within 60 days of a partial closure of any hazardous waste management unit, the owner or operator has submitted to the Commissioner, by registered mail, a certification that the unit or facility, as applicable, has been closed in accordance with the specifications in the approved closure plan. The certification has been signed by the owner or operator and by an independent professional engineer registered in NYS - 373.3.7(f)(1). N/A
17. Financial Requirements - 373-3.8 (Generators over a sole source aquifer, and State and Federal Facilities are exempt).
- A. ___ The owner or operator has a detailed written estimate of the cost of closing the facility. The estimate appears to equal the cost of closure at the point in the facility's operating life when the extent and manner of its operation would make closure the most expensive, as indicated by its closure plan. The closure cost are based on the costs of third party closure and do not incorporate any salvage values - 373-3.8(c)(1). N/A
- B. ___ Within 60 days prior to the anniversary date of the establishment of the financial instruments used to provide financial assurance for facility closure, the owner or operator has adjusted the closure cost estimate for inflation. For owners and operators using the financial test or corporate guarantee, the closure cost estimate has been updated for inflation within 30 days after the close of the firm's fiscal year - 373-3.8(c)(2). N/A
- C. ___ The closure cost estimate has subsequently been adjusted for each year of operation - 373-3.8(c)(2). N/A
- D. ___ The owner or operator has revised the new closure cost estimate no later than 30 days after a revision to the closure plan affects the cost of closure - 373-3.8(c)(3). N/A
- E. ___ The owner or operator has kept the first estimate, and all required subsequent estimates at the facility - 373-3.8(c)(4). N/A

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

- F. ___ The owner or operator has established financial assurance for closure of the facility - 373-3.8(d). N/A
- G. ___ The owner or operator of a facility or a group of facilities has demonstrated and maintained financial responsibility for bodily injury and property damage to third parties caused by sudden accidental occurrences arising from operations. This liability coverage is in the amount of at least \$1 million per occurrence with an annual aggregate of at least \$2 million - 373-3.8(h)(1). N/A

(QUESTIONS H THROUGH J ARE FOR OWNERS AND OPERATORS OF DISPOSAL FACILITIES)

- H. ___ The owner or operator of a surface impoundment, landfill, or land treatment facility or a group of such facilities has demonstrated financial responsibility for bodily injury and property damage to third parties caused by nonsudden accidental occurrences arising from operations. This liability coverage is in the amount of at least \$4.5 million per occurrence with an annual aggregate of at least \$9 million for each separate facility in NYS - 373-3.8(h)(2). N/A
- I. ___ The owner or operator of a hazardous waste disposal unit facility has a detailed written estimate of the annual costs of post-closure monitoring and maintenance of the facility - 373-3.8(e)(1). N/A
- J. ___ During the active life of the facility, the owner or operator has adjusted the post-closure cost estimate within 60 days prior to the anniversary date of the establishment of the financial instruments used to provide financial assurance - 373-3.8(e)(2). N/A

18. Tanks - 373-3.10

Complete Appendix E.

Company Name SENECA ARMY DEPOT ACTIVITY

EPA ID# No. N Y 0 2 1 3 8 2 0 8 3 0

Region/Inspector 8/CLIFFORD D. RICHMOND

Inspection Date SEPTEMBER 29, 1995

APPENDIX A
Land Disposal Restrictions

(For small quantity generators, generators and TSD's that are also generators)

I. Waste Identification

- A. List the hazardous wastes generated by the company.
(List by waste code)

SEE ATTACHMENT A

II. Dilution Prohibited as a Substitute for Treatment

- | | YES | NO |
|---|------------|--------------|
| A. Other than as described in B. below, has the generator, in any way diluted a restricted waste or the residual from treatment of a restricted waste: - 376.1(c)(1). | <u> </u> | <u> X </u> |
| 1. As a substitute for adequate treatment to achieve compliance with section 376.4. | <u> </u> | <u> X </u> |
| 2. To otherwise avoid a prohibition in section 376.3. | <u> </u> | <u> X </u> |

3. To circumvent a land disposal prohibition imposed by Article 27. X

If yes to 1, 2, or 3 above, identify the waste and provide a brief description of the dilution process.

N/A

YES NO

- B. Does the generator dilute characteristic hazardous wastes (in a treatment system which treats wastes subsequently discharged to NYS waters) pursuant to SPOES permit or for purposes of pretreatment under the Clean Water Act? [Dilution is permissible unless another method has been specified as the treatment standard in 376.4(c) (Five Letter Technology codes) or unless the waste is a D003 reactive cyanide wastewater or nonwastewater.] X

III. Waste Analysis and Recordkeeping - 376.1(g)

A. Determination of Wastes Restricted from Land Disposal.

1. Except as specified in 376.3(b), the generator has determined if his listed wastes are restricted from land disposal - 376.1(g)(1). X

The determination is based on:

- a. Testing of the wastes or extracts of the wastes using the test method described in Appendix 35 (TCLP), or X
- b. Using knowledge of the wastes X

2. Except as specified in 376.3(b), the generator has determined if his wastes exhibiting one or more characteristics (D001-D043) are restricted from land disposal - 376.1(g)(1). X

The determination is based on:

- a. Testing of extracts using the test method described in Appendix 20 (EP-tox), or X
- b. Using knowledge of the wastes. X

3. For ignitable D001 waste (that is not in the High TDC Ignitable Liquids Subcategory* or is not treated by INCIN, FSUBS or RORGS) or corrosive D002 waste that is X

prohibited under 376.3(e), the generator has determined what underlying hazardous constituents (as defined in 376.1(b)) are reasonably expected to be present in the D001 or D002 waste - 376.1(g)(1).

* High TOC Ignitable Liquids Subcategory - greater than or equal to 10% total organic carbon.

B. Restricted Wastes not Meeting Treatment Standards.

- For restricted wastes that do not meet the applicable treatment standards set forth in 376.4 or that exceed the prohibition levels in 376.3(b), the generator has notified the treatment or storage facility in writing. The notice must contain the following information: - 376.1(g)(1)(i). X
1. EPA Hazardous Waste Number - 376.1(g)(1)(i)(a). X
2. The corresponding treatment standards for wastes F001-F005, F039, wastes prohibited under 376.3(b), and for underlying hazardous constituents in D001 and D002 if these wastes are prohibited under 376.3(e). X
3. For all other restricted wastes not included in 2. above: X
- a. The treatment standard, or X
- b. A reference on the notification that, includes: X
- (1) The applicable wastewater or nonwastewater category. X
- (2) The applicable waste specific criteria within a waste code. X
- (3) The section(s) and paragraph(s) where the applicable treatment standard appears. X
4. For treatment standards expressed as specified technologies, the applicable five-letter treatment code - 376.1(g)(1)(i)(b). X
5. The manifest number of the shipment - 376.1(g)(1)(i)(c). X
6. For hazardous debris, the contaminants subject to treatment as provided by 376.4(g)(2) and the following statement: "This hazardous debris is subject to the alternative treatment standards of 376.4(g)" - 376.1(g)(1)(i)(d). X
7. Waste analysis data, where available - 376.1(g)(1)(i)(e). X

C. Restricted Wastes Meeting Treatment Standards.

- ___ For restricted wastes that can be land disposed of without further treatment, the generator has submitted a notice and a certification to the treatment, storage, or disposal facility stating that the waste meets the applicable treatment standards and prohibition levels - 376.1(g)(1)(ii). N/A
1. ___ The notice includes the following information: N/A
- a. ___ EPA Hazardous Waste Number - 376.1(g)(1)(ii)(a)(1). N/A
- b. ___ For wastes F001-F005, F039, and wastes prohibited in 376.3(b), the corresponding treatment standards - 376.1(g)(1)(ii)(a)(2). N/A
- c. ___ For all other restricted wastes not included in b. above: - 376.1(g)(1)(ii)(a)(2). N/A
- (1) ___ The treatment standard, or N/A
- (2) ___ A reference on the notification that includes. N/A
- (a) ___ The applicable wastewater or nonwastewater category. N/A
- (b) ___ The applicable waste specific criteria within a waste code. N/A
- (c) ___ The section(s) and paragraph(s) where the applicable treatment standard appears. N/A
- d. ___ For treatment standards expressed as specified technologies, the applicable five-letter treatment code - 376.1(g)(1)(ii)(a)(2). N/A
- e. ___ The manifest number for the shipment - 376.1(g)(1)(ii)(a)(3). N/A
- f. ___ Waste analysis data where available - 376.1(g)(1)(ii)(a)(4). N/A
2. ___ The certification is signed by an authorized representative and makes the required statement - 376.1(g)(1)(ii)(b). N/A

D. Wastes Exempted from Land Disposal Prohibitions.

1. ___ For wastes exempted from land disposal prohibitions such as case-by-case extensions, exemptions under 376.1(f), or nationwide capacity variances, with each shipment the generator has submitted a notice to the facility receiving the waste stating that the waste is N/A

not prohibited from land disposal - 376.1(g)(1)(iii).

2. ___ The notice includes the following information. N/A
- a. ___ EPA Hazardous Waste number - 376.1(g)(1)(iii)(a). N/A
- b. ___ For wastes F001-F005, F039, and wastes prohibited in 376.3(b), the corresponding treatment standards - 376.1(g)(1)(iii)(b). N/A
- c. ___ For all other restricted wastes not included in b. above: - 376.1(g)(1)(iii)(b). N/A
- (1) ___ The treatment standard, or N/A
- (2) ___ A reference, including: N/A
- (a) ___ The applicable wastewater or nonwastewater category. N/A
- (b) ___ The applicable waste specific criteria within a waste code. N/A
- (c) ___ The section(s) and paragraph(s) where the applicable treatment standard appears. N/A
- (d) ___ For treatment standards expressed as specified technologies, the applicable five-letter treatment code - 376.1(g)(1)(iii)(b). N/A
- d. ___ The manifest number of the shipment - 376.1(g)(1)(iii)(c). ___ N/A
- e. ___ Waste analysis date, where available - 376.1(g)(1)(iii)(d). N/A
- f. ___ For hazardous debris, the contaminants subject to treatment as provided by paragraph 376.4(g)(2) and the following statement: "This hazardous debris is subject to the alternative treatment standards of 376.4(g)" - 376.1(g)(1)(iii)(e). N/A
- g. ___ The date the waste is subject to the prohibitions - 376.1(g)(1)(iii)(f). N/A

E. Treatment of Prohibited Wastes in Containers or Tanks.

- ___ For generators managing a prohibited waste in tanks, containers, or containment buildings, regulated under Part 373-1 and treating that waste in those tanks or containers to meet applicable treatment standards the generator has: N/A

1. Developed and followed written waste analysis plan which describes the procedures the generator will carry out to comply with the treatment standards - 376.1(g)(1)(iv). N/A
2. Kept the plan on-site in the generator's records - 376.1(g)(1)(iv). N/A
3. The following requirements have been met: N/A
 - a. The waste analysis plan has been based on a detailed chemical and physical analysis of a representative sample of the prohibited waste(s) being treated, and contains all information necessary to treat the waste(s), including the selected testing frequency - 376.1(g)(1)(iv)(a). N/A
 - b. The plan has been filed with the Commissioner to implement Part 376 requirements a minimum of 30 days prior to the treatment activity with delivery verified - 376.1(g)(1)(iv)(b). N/A
 - c. Wastes shipped off-site have complied with the notification requirements for restricted wastes meeting treatment standards - 376.1(g)(1)(iv)(c). [Complete Item III.C., pgs. A-4 and A-5.] N/A

F. Recordkeeping.

1. If a generator has determined whether a waste is restricted based solely on knowledge of the waste, all supporting data used to make this determination has been retained on-site in the generator's files - 376.1(g)(1)(v). X
2. If a generator has determined whether a waste is restricted based on testing of the waste or an extract developed using the test method described in Appendix 35 (TCLP), all waste analysis data has been retained on-site in the generator's files - 376.1(g)(1)(v). X
3. If a generator has determined that he is managing a restricted waste that is excluded from the definition of hazardous or solid waste, or exempt from regulation, under 371, subsequent to the point of generation, the generator has placed in the facility's file a one-time notice stating: - 376.1(g)(1)(vi). N/A
 - a. That the waste is generated, N/A

- b. That the waste is excluded from the definition of hazardous or solid waste or exempted from regulation, and N/A
- c. The disposition of the waste. N/A
- 4. Generators must retain on-site a copy of all notices, certifications, demonstrations, waste analysis data, and other documentation for at least five years from the date that the wastes were last sent to on-site or off-site treatment, storage, or disposal. This requirement applies to solid wastes even when the hazardous characteristic is removed prior to disposal, or when the waste is excluded from the definition of hazardous or solid waste, or exempted from regulation, subsequent to the point of generation - 376.1(g)(1)(vii). N/A

G. Alternate Treatment Standards for Lab Packs.

- 1. For generators managing lab packs containing wastes identified in Appendix 38 (organometallics), who wish to use the alternate treatment standards, with each shipment the generator has: - 376.1(g)(1)(viii). X
 - a. Submitted a notice to the treatment facility in accordance with 376.1(g)(1)(i). [Complete Item III.B., page A-3] X
 - b. Made a waste determination in compliance with 376.1(g)(1)(v) & (vi). [Complete Items III.F.1-3., pgs. A-6 through A-7.] X
 - c. Submitted the certification provided in 376.1(g)(1)(viii), signed by an authorized representative. X
- 2. For generators managing lab packs containing organic wastes specified in Appendix 39, who wish to use the alternate treatment standards, with each shipment the generator has: - 376.1(g)(1)(ix). X
 - a. Submitted a notice to the treatment facility in accordance with 376.1(g)(1)(i). [Complete Item III.B., page A-3] X
 - b. Made a waste determination in compliance with 376.1(g)(1)(v) & (vi). [Complete Items III.F.1-3., page A-6 through A-7.] X
 - c. Submitted the certification provided in 376.1(g)(1)(ix), signed by an authorized representative. X

H. Small Quantity Generators with Tolling Agreements.

- ___ For generators of less than 1,000 kg per calendar month: N/A
376.1(g)(1)(x)
1. ___ The waste is reclaimed under a contractual agreement - 372.2(b)(7)(i). N/A
 2. ___ For the initial shipment of such wastes, the generator has complied with the notification and certification requirements that apply for the wastes subject to the tolling agreement - 376.1(g)(1)(x). [Complete Items III.B, C, or D, pgs A-3 through A-5, as applicable, except for manifest requirements.] N/A
 3. ___ Small quantity generators must retain on-site a copy of the initial notification and certification, together with the tolling agreement, for at least three years after termination or expiration of the agreement - 376.1(g)(1)(x). N/A

I. Hazardous Debris.

- ___ Generators or treaters who first claim that hazardous debris is excluded from the definition of hazardous waste under paragraph 371.1(d)(5) of this Title, (i.e., debris treated by an extraction or destruction technology provided by Table 1, subdivision 376.4(g), and debris that the commissioner has determined does not contain hazardous waste) are subject to the following notification and certification requirements: 376.1(g)(4). N/A
1. ___ A one-time notification must be submitted to the commissioner to include the following information: N/A
376.1(g)(4)(i).
 - a. ___ The name and address of the authorized Part 360 facility receiving the treated debris - N/A
376.1(g)(4)(i)(a).
 - b. ___ A description of the hazardous debris as initially generated, including the applicable EPA or NYS Hazardous Waste Number(s) - N/A
376.1(g)(4)(i)(b).
 - c. ___ For debris excluded under subparagraph 371.1(d)(5)(i) of this Title, the technology from Table 1, subdivision 376.4(g), used to treat the debris - N/A
376.1(g)(i)(c).
 2. ___ The notification must be updated if the debris is shipped to a different facility, and, for debris excluded under subparagraph 371.1(d)(5)(i) of this Title, if a different type of debris is treated or if a different technology is used to treat the debris - 376.1(g)(4)(ii). N/A

IV. Special Rules Regarding Wastes That Exhibit a Characteristic

- A. The generator has determined each waste code applicable to the waste in order to determine the applicable treatment standard under section 376.4. For the purposes of Part 376, the waste must carry the code for a listed waste and also any characteristic code if the waste also exhibits that characteristic, except as specified below in Item B. If the generator determines that the waste displays the characteristic of ignitability (D001)(and is not in the High TOC Ignitable Liquids Subcategory or is not treated by INCIN, FSUBS, or RORGS of subdivision 376.4(c), Table 1), or the characteristic of corrosivity (D002), and is prohibited under subdivision 376.3(e) of this Part, the generator must determine what underlying hazardous constituents (as defined in subdivision 376.1(b) of this Part) - 376.1(h)(1). X
- B. For a prohibited waste that is listed and also exhibits a characteristic, the treatment standard for the listed waste code will operate in lieu of the standard for the characteristic code, provided the treatment standard for the listed waste includes a treatment standard for the constituent that causes the waste to exhibit the characteristic. Otherwise the waste must meet the treatment standards for all applicable listed and characteristic codes - 376.1(h)(2). X
- C. Prior to land disposal, all prohibited wastes which exhibit a characteristic have been treated to the treatment standards provided in 376.4 - 376.1(h)(3). N/A
- D. For characteristic hazardous wastes that have been treated and are no longer hazardous, the initial generator has shipped the wastes to a Part 360 facility and sent the notification and certification to the Commissioner* - 376.1(h)(4). N/A

* Notification is not required to be sent to the Part 360 facility.

1. The notification includes the following information: - 376.1(h)(4)(i). N/A
- a. The name and address of the Part 360 facility receiving the waste - 376.1(h)(4)(i)(a). N/A
- b. A description of the waste as initially generated, including the applicable EPA Hazardous Waste Number(s) and treatability group(s) - 376-1(h)(4)(i)(b). N/A
- c. The treatment standards applicable to the waste at the point of generation - 376.1(h)(4)(i)(c). N/A

2. The certification is signed by an authorized representative and includes the language found in 376.1(g)(2)(v) - 376.1(h)(4)(ii). N/A

V. Prohibitions on Land Disposal

A. Solvent/Dioxin Wastes. - 376.3(a)

1. Does the company generate any of the solvent wastes YES NO F001-F005 or any dioxin wastes F020-F023 and F026-F028 that are prohibited from land disposal?

(If yes, complete Item 2.)

2. These wastes may be land disposed provided that: N/A
376.3(a)(1)
- a. The wastes meet the applicable treatment standards - 376.3(a)(1)(i). YES NO
- b. The company has been granted an exemption from a prohibition pursuant to a petition under 376.1(f) with respect to those wastes covered by the petition - 376.3(a)(1)(ii). YES NO
- c. The company has been granted an extension to the effective date of a prohibition - 376.3(a)(1)(iii). YES NO

B. Prohibited Wastes - 376.3(b)(1).

1. Does the company generate any of the following wastes? (If yes, answer Items 2 through 4 below.)
- a. Liquid hazardous wastes containing PCB's at concentrations of equal to or greater than 50 ppm - 376.3(b)(1)(i). YES NO
- b. Hazardous wastes containing halogenated organic compounds (HOCs) in concentrations greater than or equal to 1,000 ppm, that are identified as hazardous by a property that does not involve HOCs - 376.3(b)(1)(ii). YES NO
- c. Liquid hazardous wastes that contain over 134 mg/l nickel and/or 130 mg/l of thallium - 376.3(b)(1)(iii). YES NO
2. These wastes may be land disposed provided that: N/A
376.3(b)(2).
- a. Persons have been granted an exemption from a prohibitions, or - 376.3(b)(2)(i). YES NO

- b. Persons have been granted an extension to the effective date of a prohibition, or - 376.3(b)(2)(ii). YES NO
- c. They meet the applicable treatment standards, or are in compliance with all prohibitions set forth in Part 376 or RCRA section 3004(d) - 376.3(b)(2)(iii). YES NO
3. The wastes found in 1.(a)-(c) above have been subjected to the Paint Filter Liquids Test to determine if they are liquids - 376.3(b)(3). N/A
4. The initial generator of a liquid hazardous waste containing PCBs or a liquid or nonliquid hazardous waste containing HOCs has tested the waste (not an extract or filtrate) or used knowledge of the waste to determine if the waste equals or exceeds the specified prohibition levels (50 ppm for PCBs, 1,000 ppm for HOCs) - 376.3(b)(4). N/A
- C. Prohibited Waste Found in 376.3(c) [First, Second, and Third Third Wastes].
1. The initial generator has tested a representative sample of the waste extract or the entire waste, depending on whether the treatment standards are expressed as concentration in the waste extract or the waste, or used knowledge of the waste to determine if it exceeds the applicable treatment standards - 376.3(c)(7). X
- D. Waste Specific Prohibitions - Ignitable and Corrosive Characteristic Wastes.
1. The wastes specified in 6 NYCRR 371.3(b) as D001 (and is in not the High TOC Ignitable Liquids Subcategory), and specified in 371.3(c) as D002, that are managed in systems other than those whose discharge is regulated under Titles 7 and 8 of Article 17 of the ECL, the Clean Water Act (CWA) (see subdivision 370.1(e)), or that inject in Class 1 deep wells regulated under the Safe Drinking Water Act (SDWA) (see subdivision 370.1(e)), or that are zero dischargers that engage in Title 7 and 8 or CWA-equivalent treatment before ultimate land disposal, are prohibited from land disposal. Title 7 and 8 and/or CWA-equivalent treatment means biological treatment for organics, alkaline chlorination of ferrous sulfate precipitation for cyanide, precipitation/sedimentation for metals, reduction of hexavalent chromium, or other technology that can be demonstrated to perform equally or greater than these technologies* - 376.3(d). X

* (Note: Deep well injection of hazardous waste is not allowed in New York State.).

E. Variance From a Treatment Standard. - 376.4(e)

1. Has the generator submitted a petition for a variance from a treatment standard where the treatment standard is expressed as a concentration in the waste or waste extract and the waste cannot be treated to the specified level, or where the treatment technology is not appropriate to the waste? YES NO

If yes, complete Items (a) and (b) below. N/A

- (a) A generator that is managing a waste covered by a variance from a treatment standard has complied with the waste analysis requirements for a restricted waste - 376.4(e)(6).
- (b) During the petition review process, the applicant has complied with all restrictions on land disposal - 376.4(e)(7).

2. Has the generator submitted a petition for a site-specific variance from a treatment standard where the treatment standard is expressed as a concentration in the waste or waste extract and the waste which is generated under conditions specific only to one cannot be treated to the specified level, or the treatment technology is not appropriate to the waste? YES NO

If yes, complete Items (a) and (b) below. N/A

- (a) The generator, treatment facility or disposal facility managing a waste covered by a site-specific variance from a treatment standard has complied with the waste analysis requirements for a restricted waste - 376.4(e)(11).
- (b) During the application review process, the applicant has complied with all restrictions on land disposal - 376.4(e)(12).

IX. Prohibition on Storage of Restricted Wastes* - 376.5(a)

- A. The storage of hazardous wastes restricted from land disposal is permitted provided that: - 376.5(a)(1).
- I. The small quantity generator has: N/A
- a. Stored restricted waste in tanks or containers on-site solely for the purpose of the accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment, or disposal - 376.5(a)(1)(i). N/A

- b. Complied with all storage requirements of 372, 373-1, and 373-3 - 376.5(a)(1)(i). N/A
 - c. Stored all restricted wastes for 180/270 days or less - 376.5(a)(1)(i). N/A
2. The generator has:
- a. Stored restricted waste in tanks or containers on-site solely for the purpose of the accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment, or disposal - 376.5(a)(1)(i). X
 - b. Complied with all storage requirements of 372, 373-1, 373-2, and 373-3 - 376.5(a)(1)(i). X
 - c. Stored all restricted wastes for 90 days or less - 376.5(a)(1)(i). X

Company Name SENECA ARMY DEPOT ACTIVITY

EPA ID# No. N Y 0 2 1 3 8 2 0 8 3 0

Region/Inspector 8/CLIFFORD D. RICHMOND

Inspection Date SEPTEMBER 29, 1995

APPENDIX B
Land Disposal Restrictions

(For treatment, storage, and/or disposal facilities)

I. Waste Identification

A. List the hazardous wastes treated, stored and/or disposed of by the company by waste code.

SEE *ATTACHMENT A* FOR LIST OF WASTE GENERATING ACTIVITY.

II. Dilution Prohibited as a Substitute for Treatment - 376.1(c) YES NO

A. Other than as described in B. below, has the TSD, in any way diluted a restricted waste or the residual from treatment of a restricted wastes: - 376.1(c)(1). X

1. As a substitute for adequate treatment to achieve compliance with section 376.4. X

2. To otherwise avoid a prohibition in section 376.3. X

3. To circumvent a land disposal prohibition imposed by Article 27. ___ X

If yes to 1, 2, or 3 above, identify the waste and provide a brief description of the dilution process.

N/A

YES NO

- B. Does the TSD dilute characteristic hazardous wastes (in a treatment system which treats wastes subsequently discharged to NYS waters) pursuant to SPDES permit or for purposes of pretreatment under the Clean Water Act? [Dilution is permissible unless another method has been specified as the treatment standard in 376.4(c) (Five Letter Technology Codes) or unless the waste is a D003 reactive cyanide wastewater or nonwastewater. ___ X

III. Surface Impoundment Treatment - 376.1(d) YES NO

- Does the owner or operator treat* wastes which are prohibited from land disposal in a surface impoundment or series of surface impoundments? - 376.1(d)(1). ___ X

* The evaporation of hazardous constituents as the principal means of treatment in surface impoundment is not considered to be treatment for the purposes of this exemption.

Describe the waste(s) treated.

N/A

- A. ___ Treatment of the prohibited wastes occurs in the impoundments - 376.1(d)(1)(i). N/A
- B. ___ The following conditions have been met: N/A
- 376.1(d)(1)(ii).
1. ___ The residues from treatment are analyzed to determine if they meet the applicable treatment standards or prohibition levels - 376.1(d)(1)(ii)(a). N/A
2. ___ The sampling method, specified in the waste analysis plan, is designed so that representative samples of the sludge and supernatant are tested separately - 376.1(d)(1)(ii)(a). N/A
3. ___ The following treatment residues (including any liquid) are removed at least annually * - 376.1(d)(1)(ii)(b). N/A

X Violations

X Satisfactory
NA Not Applicable

- (a) ___ Residues which do not meet the treatment standards promulgated under 376.4. N/A
- (b) ___ Residues which meet or exceed the prohibition levels established under 376.3 or imposed by statute. N/A
- (c) ___ Residues which are from the treatment of wastes prohibited from land disposal under 376.3. N/A
- (d) ___ Residues from managing listed wastes which are not delisted under 370.3(c). N/A

* If the volume of liquid flowing through the impoundment or series of impoundments annually is greater than the volume of the impoundment or impoundments, this flow through constitutes removal of the supernatant.

- 1. ___ Treatment residues have not been placed in any other surface impoundment for subsequent management after original placement - 376.1(d)(1)(ii)(c). N/A
- 2. ___ The procedures and schedule for the sampling of impoundment contents, the analysis of test data, and the annual removal of land disposal restricted residues has been specified in the facility's waste analysis plan - 376.1(d)(1)(ii)(d). N/A
- 3. ___ Unless exempted or granted a waiver, the impoundment meets the design requirements of 373-2.11(b)(3), 373-3.11(i)(1) and is in compliance with applicable groundwater monitoring requirements - 376.1(d)(1)(iii). N/A
- 4. ___ The owner or operator has sent a written certification and a copy of the waste analysis plan to the Commissioner - 376.1(d)(1)(iv). N/A

IV. Case-by-Case Extensions - 376.1(e) YES NO

Does the owner or operator treat, store and/or dispose of any wastes subject to a a case-by-case extension to an effective date? - 376.1(e). X ___

Identify the waste(s) subject to extension.

FACILITY HAS MIXED WASTE (ORIGINALLY DESIGNATED 0001/F002/F003) STORED

FOR LONGER THAN A YEAR. SEE WASTE INVENTORY AND SUMMARY.

X Violations

X Satisfactory
NA Not Applicable

V. Petitions to Allow Land Disposal - 376.1(f) YES NO
Has the owner or operator applied for or been granted an exemption from a prohibition of the land disposal of a restricted hazardous waste in a particular unit(s) by the Commissioner? - 376.1(f). X

Identify the wastes subject to exemption.

N/A

VI. Waste Analysis and Recordkeeping - 376.1(g)

- A. The treatment facility has tested its waste in accordance with the frequency determined by the Commissioner and based on the criteria included in 373-2.2(e) or 373-3.2(d) - 376.1(g)(2). X
- B. The treatment facility has specified the frequency of testing in its waste analysis plan - 376.1(g)(2). X
- C. The treatment facility has performed the testing as follows: X
1. For wastes with treatment standards expressed as concentrations in the waste extract (376.4(b)), the owner or operator has tested the treatment residues, or an extract of such residues developed using the test method described in Appendix 35 (TCLP), to assure that they meet the applicable treatment standards - 376.1(g)(2)(i). X
2. For wastes that are prohibited (376.3(b)), but not subject to any treatment standards under 376.4, the owner or operator has tested the treatment residues according to generator testing requirements specified in 376.3(b), to assure that the treatment residues comply with the applicable prohibitions - 376.1(g)(2)(ii). X
3. For wastes with treatment standards expressed as concentrations in the waste (376.4(d)), the owner or operator has tested the treatment residues (not an extract) to assure that the treatment residues meet the applicable treatment standards - 376.1(g)(2)(iii). X
4. The treatment facility has sent a notice with each waste shipment to the land disposal facility - 376.1(g)(2)(iv). NA

5. ___ The notice contains the following information: - N/A
376.1(g)(2)(iv).
- a. ___ EPA Hazardous Waste Number - N/A
376.1(g)(2)(iv)(a).
- b. ___ For wastes F001-F005, F039, and wastes N/A
prohibited in 376.3(b), the corresponding
treatment standards - 376.1(g)(2)(iv)(b).
- c. ___ For all other restricted wastes not N/A
included in (b) above:
- (1) ___ The treatment standard or N/A
- (2) ___ A reference on the notification, N/A
including:
- (a) ___ The applicable wastewater N/A
or nonwastewater category.
- (b) ___ The applicable waste specific N/A
criteria within a waste code.
- (c) ___ The section(s) and paragraph(s) N/A
where the applicable treatment
standard appears.
- d. ___ For treatment standards expressed as specified N/A
technologies, the applicable five-letter
treatment code - 376.1(g)(2)(iv)(b).
- e. ___ The manifest number of the shipment - N/A
376.1(g)(2)(iv)(c).
- f. ___ Waste analysis data, where available - N/A
376.1(g)(2)(iv)(d).
- D. ___ The treatment facility has submitted a certification N/A
signed by an authorized representative, with each
shipment of waste or treatment residue to the land
disposal facility, stating that the waste or treatment
residue has been treated in compliance with the
applicable performance standards (376.4) and the
applicable prohibitions (376.3(b)) - 376.1(g)(2)(v).
1. ___ For wastes with treatment standards expressed as N/A
concentrations in the waste extract or in the waste
(376.4(b) or 376.4(d)), or for wastes prohibited
under 376.3(b), which are not subject to any
treatment standards under 376.4, the certification
contains the statement required in 376.1(g)(2)(v)(a).

X Violations

X Satisfactory
NA Not Applicable

2. ___ For wastes with treatment standards expressed as technologies (376.4(c)), the certification contains the statement required in 376.1(g)(2)(v)(b). N/A
3. ___ For wastes with treatment standards expressed as concentrations in the waste (376.4(d)), if compliance with treatment standards is based on non-detectability of organic constituents referred to in 376.4(d)(3), the certification also contains the statement required in 376.1(g)(2)(v)(c). N/A

VII. Restricted Wastes Shipped from one TSD to Another - 376.1(g)(2)(vi)

- A. ___ If the waste or treatment residue will be further managed at a different treatment or storage facility, the treatment, storage or disposal facility sending the waste or treatment residue off-site has complied with the notice and certification requirements that apply to generators - 376.1(g)(2)(vi). N/A

B. **Restricted Wastes not Meeting Treatment Standards.**

- ___ For restricted wastes that do not meet the applicable treatment standards set forth in 376.4 or that exceed the prohibition levels in 376.3(b), the generator has notified the treatment or storage facility in writing. The notice must contain the following information: - 376.1(g)(1)(i). N/A
1. ___ EPA Hazardous Waste Number - 376.1(g)(1)(i)(a). N/A
 2. ___ The corresponding treatment standards for wastes F001-F005, F039, wastes prohibited under 376.3(b), and for underlying hazardous constituents in D001 and D002 if these wastes are prohibited under 376.3(e). N/A
 3. ___ For all other restricted wastes not included in 2. above: N/A
 - a. ___ The treatment standard, or N/A
 - b. ___ A reference on the notification, including: N/A
 - (1) ___ The applicable wastewater or nonwastewater category. N/A
 - (2) ___ The applicable waste specific criteria within a waste code. N/A
 - (3) ___ The section(s) and paragraph(s) where the applicable treatment standard appears. N/A

X Violations

X Satisfactory
 NA Not Applicable

- 4. ___ For treatment standards expressed as specified technologies, the applicable five-letter treatment code - 376.1(g)(1)(i)(b). N/A
- 5. ___ The manifest number of the shipment - 376.1(g)(i)(c). N/A
- 6. ___ For hazardous debris, the contaminants subject to treatment as provided by 376.4(g)(2) and the following statement: "This hazardous debris is subject to the alternative treatment standards of 376.4(g)" - 376.1(g)(1)(i)(d). N/A
- 7. ___ Waste analysis data, where available - 376.1(g)(1)(i)(d). N/A
- C. ___ For restricted wastes or treatment residues that meets the treatment standard the notice contains the following information: N/A
 - 1. ___ EPA Hazardous Waste Number - 376.1(g)(1)(ii)(a)(1). N/A
 - 2. ___ For wastes F001-F005, F039, and wastes prohibited in 376.3(b), the corresponding treatment standards - 376.1(g)(1)(ii)(a)(2). N/A
 - 3. ___ For all other restricted wastes not included in 2. above: - 376.1(g)(1)(ii)(a)(2). N/A
 - a. ___ The treatment standard, or N/A
 - b. ___ A reference on the notification that includes: N/A
 - (1) ___ The applicable wastewater or nonwastewater category. N/A
 - (2) ___ The applicable waste specific criteria within a waste code. N/A
 - (3) ___ The section(s) and paragraph(s) where the applicable treatment standard appears. N/A
 - 4. ___ For treatment standards expressed as specified technologies, the applicable five-letter treatment code - 376.1(g)(1)(ii)(a)(2). N/A
 - 5. ___ The manifest number for the shipment - 376.1(g)(1)(ii)(a)(3). N/A
 - 6. ___ Waste analysis data where available - 376.1(g)(1)(ii)(a)(4). N/A

X Violations

X Satisfactory
NA Not Applicable

7. ___ The certification is signed by an authorized representative and makes the required statement - 376.1(g)(1)(ii)(b). N/A

VIII. Recyclable Materials Used in a Manner Constituting Disposal - 376.1(g)(2)(vii). N/A

A. ___ With each shipment, where the wastes are recyclable materials used in a manner constituting disposal [374.3(a)(2)], the owner or operator of the recycling facility has submitted a certification and a notice to the Commissioner*. The notice must contain the following information: N/A

1. ___ EPA Hazardous Waste Number - 376.1(g)(1)(iv)(a). N/A

2. ___ For wastes F001-F005, F039, and wastes prohibited in 376.3(b), the corresponding treatment standards - 376.1(g)(2)(iv)(b). N/A

3. ___ For all other restricted wastes not included in 2. above: - 376.1(g)(2)(iv)(b). N/A

(a) ___ The treatment standard, or N/A

(b) ___ A reference including: N/A

(1) ___ The applicable wastewater or nonwastewater category. N/A

(2) ___ The applicable waste specific criteria within a waste code. N/A

(3) ___ The section(s) and paragraph(s) where the applicable treatment standard appears. N/A

(4) ___ For treatment standards expressed as specified technologies, the applicable five-letter treatment code - 376.1(g)(2)(iv)(b). N/A

4. ___ Waste analysis date, where available - 376.1(g)(2)(iv)(d). N/A

* The owner or operator of the treatment facility (i.e., the recycler) is not required to notify the receiving facility.

B. ___ The certification must contain the statement found in subparagraph 376.1(g)(2)(v) - 376.1(g)(2)(vii). N/A

X Violations

X Satisfactory
NA Not Applicable

- C. ___ The owner or operator of the treatment facility (i.e., the recycler) has kept records of the name and location of each entity receiving the hazardous waste-derived product - 376.1(g)(2)(vii). N/A

IX. Requirements for Land Disposal Facilities - 376.1(g)(3).

- ___ Except for the disposal of any waste that is a recyclable material used in a manner constituting disposal (374-1.3(a)(2)), the owner or operator of any land disposal facility disposing of any restricted wastes has: - 376.1(g)(3). N/A
- A. ___ Copies of the required notices and certifications - 376.1(g)(3)(i). N/A
- B. ___ Tested the waste, or an extract of the waste or treatment residue developed using the test method described in Appendix 35 (TCLP), or using any methods required by generators under 376.3(b), to assure that applicable treatment standards (376.4) and all applicable prohibitions (376.3(b)) are complied with - 376.1(g)(3)(ii). N/A
- C. ___ Specified the frequency of testing in its waste analysis plan - 376.1(g)(3)(iii). N/A
- D. ___ Tested its waste in accordance with the frequency determined by the Commissioner and based on the criteria included in 373-2.2(e) or 373-3.2(d) - 376.1(g)(3)(ii). N/A

X. Special Rules Regarding Wastes that Exhibit a Characteristic - 376.1(h)

- A. ___ In addition to any applicable standards determined from the initial point of generation, prior to land disposal, all prohibited wastes which exhibit a characteristic have been treated to the treatment standards provided in 376.4 - 376.1(h)(3). N/A
- B. ___ For characteristic hazardous wastes that have been treated and are no longer hazardous, the initial generator has shipped the wastes to a Part 360 facility and sent the notification and certification to the Commissioner* - 376.1(h)(4). N/A

* Notification is not required to be sent to the Part 360 facility.

1. ___ The notification includes the following information: - N/A
376.1(h)(4)(i).
- a. ___ The name and address of the Part 360 facility receiving the waste - 376.1(h)(4)(i)(a). N/A

X Violations

X Satisfactory
NA Not Applicable

- b. A description of the waste as initially generated, including the applicable EPA Hazardous Waste Number(s), and treatability group(s) - 376.1(h)(4)(i)(b). N/A
- c. The treatment standards applicable to the waste at the initial point of generation - 376.1(h)(4)(i)(c). N/A
- 2. The certification is signed by an authorized representative and includes the language found in 376.1(g)(2)(v) - 376.1(h)(4)(ii). N/A

XI. Prohibitions on Land Disposal - 376.3

A. Solvent/Dioxin Wastes - 376.3(a)

1. Does the owner/operator land dispose any of the solvent wastes F001 - F005 or any dioxin wastes F020 - F023 and F026 - F028? ___ YES NO

If yes, complete Item No. 2.

2. The wastes are landfilled because they meet one of the following conditions: 376.3(a)(1).
- a. The wastes meet the applicable treatment standards - 376.3(a)(1)(i). N/A
 - b. The company has been granted an exemption from a prohibition pursuant to a petition under 376.1(f) with respect to those wastes covered by the petition - 376.3(a)(1)(ii). N/A
 - c. The company has been granted an extension to the effective date of a prohibition - 376.3(a)(1)(iii). N/A

B. Prohibited Wastes: California List Wastes - 376.3(b).

1. Does the company have any of the following wastes? (If yes, answer Items 2-3)
- a. Liquid hazardous wastes containing PCB's at concentrations of equal to or greater than 50 ppm. YES ___ NO
 - b. Hazardous wastes containing halogenated organic compounds (HOCs) in concentrations greater than or equal to 1,000 ppm, that are identified as hazardous by a property that does not involve HOCs. ___ YES NO
 - c. Liquid hazardous wastes that contain over 134 mg/l nickel and/or 130 mg/l of thallium. ___ YES NO

- 2. These wastes are land disposed because they meet one of the following conditions: - 376.3(b)(2).
 - a. Persons have been granted an exemption from a prohibition, or - 376.3(b)(2)(i). N/A
 - b. Persons have been granted an extension to the effective date of a prohibition, or - 376.3(b)(2)(ii). N/A
 - c. They meet the applicable treatment standards, or are in compliance with all prohibitions set forth in Part 376 or RCRA section 3004(d) - 376.3(b)(2)(iii). N/A
- 3. The wastes found in 1.(a)-(c) above have been subjected to the Paint Filter Liquids Test to determine if they are liquids - 376.3(b)(3). N/A

C. Ignitable and Corrosive Characteristic Wastes - 376.3(e)

- 1. The wastes specified in 6 NYCRR 371.3(b) as D001 (and is not in the High TOC Ignitable Liquids Subcategory), and specified in 371.3(c) as D002, that are managed in systems other than those whose discharge is regulated under Titles 7 and 8 of Article 17 of the ECL, the Clean Water Act (CWA) (see subdivision 370.1(e)), or that inject in Class 1 deep wells regulated under the Safe Drinking Water Act (SDWA) (see subdivision 370.1(e)), or that are zero dischargers that engage in Title 7 and 8 or CWA-equivalent treatment before ultimate land disposal, are prohibited from land disposal. Title 7 and 8 and/or CWA-equivalent treatment means biological treatment for organics, alkaline chlorination or ferrous sulfate precipitation for cyanide, precipitation/sedimentation for metals, reduction of hexavalent chromium, or other technology that can be demonstrated to perform equally or greater than these technologies - 376.3(e)(1). N/A

(Note: Deep well enjection of hazardous waste is not allowed in New York State.)

Does the company treat any wastes that fall into the above category? YES NO

If yes list wastes and treatment method:

N/A

XII. Treatment Standards - 376.4A. Applicability of Treatment Standards - 376.4(a)

1. ___ A restricted waste identified in 376.4(b) [Table CCWE] may be land disposed only if an extract of the waste or the treatment residue does not exceed the value shown in Table CCWE for any hazardous constituent as determined by TCLP, with the following exceptions: D004, D008, K031, K084, K101, K012, P010, P011, P012, P036, P038 and U136 - 376.4(a)(1). N/A
2. ___ The individual wastes listed in 1. above may be land disposed only if an extract of the waste or the treatment residue as determined by TCLP or EP-Tox does not exceed the value shown in Table CCWE for any hazardous constituent - 376.4(a)(1)(i). N/A
3. ___ A restricted waste that has a specified treatment technology [376.4(c)(1)] or hazardous debris that has a specified technology [376.4(g)], may be land disposed only after treatment using that technology or an equivalent treatment method approved by the Commissioner. - 376.4(a)(2). N/A
4. ___ For waste displaying the characteristic of ignitability (D001) and reactivity (D003), that are diluted to meet the deactivation treatment standard in subdivision 376.4(c) Tables 1 and 2 (DEACT), the treater must comply with the precautionary measures specified in paragraphs 373-2.2(i)(2) and 373-3.2(h)(2) of this Title - 376.4(a)(2). N/A
5. ___ If a treatment standard has been established in subdivisions 376.4(b), (c), or (d) for a hazardous waste that is itself hazardous debris, the waste is subject to those standards rather than the standards for hazardous debris under subdivision 376.4(b) - 376.4(a)(4). N/A
6. ___ A restricted waste identified in 376.4(d) [Table CCW] may be land disposed only if the constituent concentrations in the waste or treatment residue of the waste do not exceed the value shown in Table CCW - 376.4(a)(3). N/A

B. Treatment Standards Expressed as Concentrations in Waste Extract - 376.4(b)

1. ___ Table CCWE identifies the restricted wastes and the concentration of their associated constituents which may not be exceeded by the extract of a waste or waste treatment residual as determined by TCLP - 376.4(b)(1). N/A

2. ___ If wastes with differing treatment standards for a constituent of concern are combined for purposes of treatment, the treatment residue meets the lowest treatment standard for that constituent - 376.4(b)(2). N/A
3. ___ The treatment standards for the constituents in F001-F005 which are listed in Table CCWE only apply to wastes which contain one, two, or all three of these constituents. If the waste contains any of these three constituents along with any of the other 26 constituents found in F001-F005, then only the treatment standards in subdivision 376.4(d) Table CCW are required - 376.4(b)(3). N/A

C. Treatment Standards Expressed as Specified Technologies - 376.4(c).

1. ___ Any wastes identified in a-d below, Table 2* or Table 3** of 376.4(c) have been treated using the technology or technologies specified in a-d below or in Table 1*** - 376.4(c)(1). N/A

* Technology-Based Standards by RCRA Waste Code.

** Technology-Based Standards for Specific Radioactive Hazardous Mixed Waste.

*** Description of Technology-Based Standards and Five-Letter Technology Codes.

- a. ___ Liquid hazardous wastes containing PCBs greater than or equal to 50 ppm and less than 500 ppm have been incinerated in accordance with 40 CFR 761.70, or burned in high efficiency boilers in accordance with 40 CFR 761.60* - 376.4(c)(1)(i). N/A
- b. ___ Liquid hazardous waste containing PCBs greater than 500 ppm have been incinerated in accordance with 40 CFR 761.70* - 376.4(c)(1)(i). N/A

* Thermal treatment is also in compliance with all applicable NYS regulations.

- c. ___ Hazardous wastes containing halogenated organic compounds in concentrations greater than or equal to 1,000 mg/kg that are prohibited under 376.3(b)(1) have been incinerated* - 376.4(c)(2)(ii). N/A

* These treatment standards do not apply where the waste is subject to a treatment standard for a specific HOC (such as a hazardous waste chlorinated solvent for which a treatment standard is established).

- d. ___ A mixture of wastewater (the discharge of which is subject to regulation under ECL Article 17 or the Clean Water Act) and de minimis losses of materials from manufacturing, which meets the criteria of the D001 ignitable liquids containing greater than 10% organic constituents (TOC) subcategory, has been treated using the DEACT treatment standard - 376.4(c)(1)(iii). N/A

2. ___ An alternative treatment method approved by the Commissioner has been used in lieu of a standard established in Parts 376.4(c)(1), (3) and (4) - 376.4(c)(2). N/A
- Specify the waste treated:
-
-
3. ___ As an alternative to the otherwise applicable 376.4 treatment standards, lab packs have been land disposed provided the following requirements are met: - 376.4(c)(3). N/A
- a. ___ Lab packs comply with the applicable provisions of 373-2.14(1) and 373-3.14(i) - 376.4(c)(3)(i). N/A
- b. ___ All hazardous wastes contained in lab packs are specified in Appendix 38 or 39 of this title - 376.4(c)(3)(ii). N/A
- c. ___ The lab packs are incinerated in accordance with the requirements of 373-2.15 and 373-3.15 - 376.4(c)(3)(iii). N/A
- d. ___ Any incinerator residues from lab packs containing D004 - D008, D010 and D011 are treated in compliance with the applicable treatment standards for such wastes - 376.4(c)(3)(iv). N/A
4. ___ Radioactive hazardous mixed wastes with treatment standards specified in Table 3 of this subdivision are not subject to any treatment standards specified in subdivision 376.4(b), 376.4(d), or Table 2 of this subdivision. Radioactive hazardous mixed wastes not subject to treatment standards in Table 3 of this subdivision remain subject to all applicable treatment standards specified in subdivisions 376.4(b), 376.4(d), and Table 2 of this subdivision. Hazardous debris containing radioactive waste is not subject to the treatment standards specified in Table 3 of this subdivision, but is subject to the treatment standards specified in subdivision 376.4(g) - 376.4(c)(4). N/A

D. Treatment Standards Expressed as Waste Concentrations - 376.4(d)

1. ___ Table CCW identified the restricted wastes and the concentrations of their associated constituents of concern which may not be exceeded by the waste or treatment residual (not an extract of either) for allowable land disposal - 376.4(d)(1). N/A
2. ___ When wastes with differing treatment standards for a constituent of concern have been combined for treatment, the treatment residue meets the lowest treatment standard for that constituent - 376.4(d)(2). N/A
3. ___ For organic constituents specified by footnote in Table CCW, the treatment and disposal facility has: - 376.4(d)(3). N/A
 - a. ___ Certified compliance with the treatment standards, and N/A
 - b. ___ Satisfactorily demonstrated the following conditions: N/A
 - (1) ___ The treatment standards for the organic constituents were established based on incineration or based on combustion in fuel substitution units - 376.4(d)(3)(i). N/A
 - (2) ___ The organic constituents have been treated using the methods specified in (1) above - 376.4(d)(3)(i). N/A
 - (3) ___ The treatment or disposal facility has been unable to detect the organic constituents despite its best good-faith efforts as defined by applicable Department guidance or standards - 376.4(d)(3)(iii). N/A

E. Variance From a Treatment Standard - 376.4(e).

1. ___ Each petition for a variance from a treatment standard has been submitted to the Commissioner in accordance with the procedures outlined in 6NYCRR Part 370.3(a) - 376.4(e)(2). N/A
2. ___ Each petition includes the required certification - 376.4(e)(3). N/A
3. ___ A generator, treatment facility or disposal facility that is managing a waste covered by a variance from a treatment standard has complied with the waste analysis requirements for a restricted waste - 376.4(e)(6). N/A

4. — During the petition review process, the applicant has complied with all restrictions on land disposal - 376.4(e)(7). N/A
5. — Applications for a site-specific variance must include the information in 6NYCRR Part 370.3(a)(2) - 376.4(e)(9). N/A
6. — The generator, treatment facility or disposal facility managing a waste covered by a site-specific variance from a treatment standard has complied with the waste analysis requirements for a restricted waste - 376.4(e)(11). N/A
7. — During the application review process, the applicant has complied with all restrictions on land disposal - 376.4(e)(12). N/A
- F. PCB Disposal - 376.4(f).
1. — Except for waste B002, all PCB waste not regulated under 376.3(b) has been disposed of in accordance with 40 CFR 761 (TOSCA) - 376.4(f)(1). N/A
2. — Waste B002, from any source other than a spill, has not been stabilized or mixed with any substance in order to conform with 40 CFR 761 regarding land disposal - 376.4(f)(1)(i). N/A

XIV. Treatment Standards for Hazardous Debris - 376.4(g)

- A. — Hazardous debris has been treated, as follows, prior to land disposal, unless it has been determined that the debris is no longer contaminated with hazardous waste, or that the debris has been treated to the waste - specific treatment standard for the waste contaminating the debris: 376.4(g)(1). N/A
1. — General. Hazardous debris must be treated for each "contaminant subject to treatment" defined in Item B. below using the technology or technologies identified in Table 1 - 376.4(g)(1)(i). N/A
2. — Characteristic debris. Hazardous debris that exhibits the characteristic of ignitability, corrosivity, or reactivity, must be deactivated by treatment using one of the technologies identified in Table 1 - 376.4(g)(1)(ii). N/A
3. — Mixtures of debris types. The treatment standards of Table 1 in this subdivision must be achieved for each type of debris contained in a mixture of debris types. If an immobilization technology is used in a

treatment train, it must be the last treatment technology used - 376.4(g)(1)(iii).

4. ___ Mixtures of contaminant types. Debris that is contaminated with two or more contaminants subject to treatment identified under Item B below must be treated for each contaminant using one or more applicable treatment technologies identified in Table 1 of this subdivision. If an immobilization technology is used in a treatment train, it must be the last treatment technology used - 376.4(g)(1)(iv). N/A
5. ___ PCBs. Hazardous debris that is also a hazardous PCB under Part 371 of this Title or a waste PCB under 40 CFR Part 761 (see subdivision 370.1(e)), is subject to the requirements of subdivision 376.4(f), 40 CFR Part 761 (see subdivision 370.1(e)), or the requirements of this subdivision, whichever are more stringent - 376.4(g)(1)(v). N/A
- B. ___ Hazardous debris must be treated for each "contaminant subject to treatment." The contaminants subject to treatment must be determined as follows: - 376.4(g)(1). N/A
 1. ___ Toxicity characteristic debris. The contaminants subject to treatment for debris that exhibits the Toxicity Characteristic (TC) by subdivision 371.3(e) of this Title are those EP constituents for which the debris exhibits the TC toxicity characteristic - 376.4(g)(1)(i). N/A
 2. ___ Debris contaminated with listed waste. The contaminants subject to treatment for debris that is contaminated with a prohibited listed hazardous waste are those constituents for which BDAT standards are established for the waste under subdivisions 376.4(b) and 376.4(d) - 376.4(g)(2)(ii). N/A
 3. ___ Cyanide reactive debris. Hazardous debris that is reactive due to the presence of cyanide must be treated for cyanide - 376.4(g)(2)(iii). N/A
- C. ___ Hazardous debris which has been treated using one of the specified extraction or destruction technologies in Table 1 of this subdivision and which does not exhibit a characteristic of hazardous waste after treatment is not a hazardous waste and need not be managed in a Part 373 facility. Hazardous debris contaminated with a listed waste that is treated by an immobilization technology specified in Table 1 is a hazardous waste and must be managed in a Part 373 facility - 376.4(g)(3). treatment must be determined as follows: - 376.4(g)(1). N/A
- D. ___ Treatment residuals must meet the following general requirements except as provided in Items 3 and 5 below: - 376.4(g)(4)(i). N/A

X Violations

X Satisfactory
NA Not Applicable

1. Residue from the treatment of hazardous debris must be separated from the treated debris using simple physical or mechanical means; and - 376.4(g)(4)(i)(a). N/A
2. Residue from the treatment of hazardous debris is subject to the waste-specific treatment standards provided by section 376.4 of this Part for the waste contaminating the debris - 376.4(g)(4)(i)(b). N/A
3. Residue from the deactivation of ignitable, corrosive, or reactive characteristic hazardous debris (other than cyanide-reactive) that is not contaminated with a contaminant subject to treatment defined by paragraph (2) of this subdivision, must be deactivated prior to land disposal and is not subject to the waste-specific treatment standards of section 376.4 of this Part - 376.4(g)(4)(ii). N/A
4. Residue from the treatment of debris that is reactive due to the presence of cyanide must meet the standards for D003 under subdivision 376.4(d) - 376.4(g)(4)(iii). N/A
5. Ignitable nonwastewater residue containing equal to or greater than 10 percent total organic carbon is subject to the technology-based standards for D001: "Ignitable Liquids based on subdivision 371.3(b)" under subdivision 376.4(c) - 376.4(g)(4)(iv). N/A
6. Layers of debris removed by spalling are hazardous debris that remain subject to the treatment standards of this section - 376.4(g)(4)(v).
for cyanide - 376.4(g)(2)(iii). N/A

XV. Prohibition on Storage of Restricted Wastes - 376.5(a)

- A. The storage of hazardous wastes restricted from land disposal is permitted provided that: - 376.5(a)(1). ___
1. The owner or operator of a hazardous waste treatment storage, or disposal facility has: ___
 - a. Only stored restricted wastes in tanks or containers for up to one year solely for the purpose of the accumulation of such quantities as necessary to facilitate proper recovery, treatment, or disposal - 376.5(a)(1)(ii). ___
 - b. Clearly marked each container or tank to identify its contents and the date each period of accumulation begins - 376.5(a)(1)(i)(a). X

X Violations

X Satisfactory
NA Not Applicable

- c. Maintained in the operating record the contents and beginning accumulation date for each tank and container - 376.5(a)(1)(ii)(b). X
- d. Complied with all operating record requirements of 373-2.5(c) or 373-3.5(c) - 376.5(a)(1)(ii)(b). X
2. Liquid hazardous wastes containing PCBs at concentrations greater than or equal to 50 ppm have been stored at facilities that meet the requirements of 371 through 376 and 40 CFR 761.65(b), and have been removed from storage and treated or disposed of as required within one year of the date when such wastes were placed in storage - 376.5(a)(6). X
- B. Unless the Department can prove that such storage was not solely for the purpose of accumulation of such quantities as necessary to facilitate proper recovery, treatment or disposal, the owner/operator of a treatment, storage or disposal facility may store restricted waste for up to one year - 376.5(a)(2). X
- C. The owner/operator of a treatment, storage or disposal facility has stored restricted waste beyond one year and has proven that the storage was solely for the purpose of accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment, or disposal - 376.5(a)(3). X

Company Name SENECA ARMY DEPOT ACTIVITY

EPA ID# No. N Y 0 2 1 3 8 2 0 8 3 0

Region/Inspector 8/CLIFFORD D. RICHMONO

Inspection Date SEPTEMBER 29, 1995

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

APPENDIX K

Incinerators and Energy Recovery Units - 373-3.15

- A. The owner or operator has sufficiently analyzed any waste which he has not previously burned in his incinerator or energy recovery unit to (373-3.15(b)):
- (1) enable him to establish steady (normal) operating conditions - 373-3.15(b); N/A
- (2) determine the type of pollutants which might be emitted. At a minimum, the analysis must determine (373-3.15(b)):
- (a) heating value of the waste - 373-3.15(b)(1); N/A
- (b) halogen content and sulfur content in the waste - 373-3.15(b)(2), and N/A
- (c) concentrations in the waste of lead and mercury, unless the owner or operator has written, documented data that shows the element is not present - 373-3.15(b)(3). N/A
- B. The owner or operator has conducted the following monitoring and inspections when incinerating or burning hazardous wastes - 373-3.15(d):
- (1) Existing instruments which relate to combustion and emission control monitored at least every 15 minutes; - 373-3.15(d)(1). N/A
- (2) appropriate corrections to maintain steady state combustion conditions are made immediately, either automatically or by the operator - 373-3.15(d)(1). N/A
- (3) The complete incinerator or energy recovery facility and associated equipment are inspected at least daily for leaks, spills, and fugitive emissions - 373-3.15(d)(2). N/A
- (4) All emergency shut-down controls and system alarms are checked to assure proper operation - 373-3.15(d)(2). N/A
- C. At closure, the owner or operator has removed all hazardous waste and hazardous waste residues from the incinerator or energy recovery unit - 373-3.15(e). N/A

*Facility has not operated incinerator in several years.

Company Name SENECA ARMY DEPOT ACTIVITY

EPA ID# No. N Y 0 2 1 3 8 2 0 8 3 0

Region/Inspector 8/CLIFFORD D. RICHMOND

Inspection Date SEPTEMBER 29, 1995

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

APPENDIX M

Thermal Treatment

- A. Before adding hazardous waste, the owner or operator has brought his thermal treatment process to steady state (normal) conditions of operation - 373-3.16(b). N/A
- B. In addition to the waste analyses required by subdivision 373-3.2(d), the owner or operator has sufficiently analyzed any waste which he has not previously treated in his thermal process to:
- (1) Enable him to establish steady state (normal) or other appropriate (for a non-continuous process) operating conditions (including waste and auxiliary fuel feed) - 373-3.16(c). N/A
- (2) Determine the type of air contaminants which might be emitted - 373-3.16(c). N/A
- (3) Determine the heating value of the waste - 373-3.16(c)(1). N/A
- (4) Determine the halogen content and sulfur content in the waste - 373-3.16(c)(2). N/A
- (5) Determine the concentrations in the waste of lead and mercury, unless the owner or operator has written documented data that show the element is not present - 373.16(c)(3). N/A
- C. The owner and operator has conducted, as a minimum, the following monitoring and inspections when thermally treating hazardous waste:
- (1) Existing instruments which relate to temperature and emission control must be monitored at least every 15 minutes - 373-3.16(d)(1)(i). N/A
- (2) Appropriate corrections to maintain steady state or other appropriate thermal treatment conditions are not made immediately, either automatically or by the operator - 373-3.16(d)(1)(i). N/A

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

- (3) ___ The stack plume (emissions), where present, is observed visually at least hourly for normal appearance (color and opacity) - 373-3.16(d)(1)(ii). N/A
- (4) ___ The operator must immediately make any indicated operating corrections necessary to return any visible emissions to their normal appearance - 373-3.16(d)(1)(ii). N/A
- (5) ___ The complete thermal treatment process and associated equipment (pumps, valves, conveyors, pipes, etc.) are inspected at least daily for leaks, spills and fugitive emissions, and system alarms must be checked to assure proper operation - 373-3.16(d)(1)(iii). N/A
- D. ___ At closure, the owner or operator has removed all hazardous waste and hazardous waste residues from the thermal treatment process or equipment - 373-3.16(e). N/A
- E. ___ Open burning of hazardous waste is prohibited except for the open burning and detonation of waste explosives - 373-3.16(f). X

TABLE C-1
 CHARACTERISTICS OF WASTES GENERATED BY SEAD,
 RATIONALE FOR SAMPLING, AND FREQUENCY OF ANALYSES

WASTE	DRUMS/ YEAR	POTENTIAL HAZARD	TYPICAL % COMP	TEST PARAMETERS	RATIONALE	SAMPLER, CONTAINER, LOCATION (1)	FREQUENCY OF ANALYSIS	
							# OF GENERATION POINTS	MINIMUM ANNUAL TESTS
MACHINE CLEANING WASTES								
Paper filters from paint spray booms (D001, D006, D007, D008)	10	ignitable, toxic	paper filters 1 to 10% paint (dry) 0 to 1% paint thinner < 5 ppm Pb 0 to 1 ppm Cd 0 to 5 ppm Cr 0 to 5 ppm inert filter mat'l 90 to 95% (of waste) inert overpacking mat'l 20% of drum	Pb, Cd, Cr	potentially ignitable; metals are a suspected contaminant	G, GT, S	2	1 (2)
Methylene chloride and stripped paint, absorbent, dirt, etc. (F002, D006, D007, D008) (Vegan mat'l is 75% methylene chloride, 10% methanol, and 15% inert)	15	ignitable, toxic	methylene chloride 7 % methanol 1 % oily solids 0 to 5% paint solids 10 to 20 % inert mat'l's 53 to 68% Pb 0 to 5 ppm Cd 0 to 1 ppm Cr 0 to 5 ppm	Flash point; Fuel value Metals VOCs	potentially ignitable; may be recoverable	C, GT, R	1	1
Spent standard solvent (D001)	10	ignitable toxic	standard solvent 90 % (aliphatic hydrocarbons) contaminated with oil & grease 0 % and dirt 4 %	Flash point	potentially ignitable	C, GT, R	5	5
Solvent booms from recovery of 1,1,1 trichloroethane solvent (F001)	10	ignitable, toxic	liquid solvent; 90 % sludge, dirt, & grease 10 % sludge solvent; 10 % sludge, dirt, & grease 90 % paint chips, Pb, Cd, Cr	% Total solids; Flash point; VOCs Pb Cd Cr	determine mgmt. options; potentially ignitable; known constituent/ personal protection	T, GT, B (grab for liquid layer)	5	5
Sludge from oil/grease separators and drains from engine cleaning operations (D006, D007, D008)	10	toxic	oil/grease 20 % solids 75 % water 5 % Pb 5 to 40 ppm Cd, Cr 0 to 1 ppm	% Total solids; Oil and Grease VOCs	determine mgmt. options; potentially ignitable; known constituent/ personal protection	T, GT, B (grab for liquid layer)	5	5
Mixed recoverable solvents (D001)	10	ignitable, toxic	mixed recoverable solvents 80 to 90 % (aliphatic hydrocarbons) oil/grease 10 % solids 0 to 10 %	Flash point; Fuel value; VOCs	potentially ignitable; may be recoverable; known constituent/ personal protection	C, GT, R	5*	5*

* Includes recoverable and non-recoverable solvents

TABLE C-1
 CHARACTERISTICS OF WASTES GENERATED BY SEAD,
 RATIONALE FOR SAMPLING, AND FREQUENCY OF ANALYSES

WASTE	DRUMS/ YEAR	POTENTIAL HAZARD	TYPICAL % COMP.	TEST PARAMETERS	RATIONALE	SAMPLER, CONTAINER, LOCATION (1)	FREQUENCY OF ANALYSIS	
							# OF GENERATION POINTS	MINIMUM ANNUAL TESTS
Mixed nonrecoverable solvents (D001)	5	ignitable, toxic	solvents 75 to 85 % oil/grease 10 to 15 % solids* 5 to 10 % * wastes containing less than 10% solids residues expressed as "solid" containing free liquids (if applicable)	Flash point; Fuel value; VOCs	potentially ignitable; may be recoverable; known constituent/ personal protection	C,GT,R		
Coth rags contaminated w/ solvents, dry absorbents (F001, F003, F005, D001)	100	ignitable, toxic	rags 20 % absorbent clay 70 % solvents 10 %	(stored as ignitable)	potentially ignitable;	G,GT,S	5	1 (3)
Slud bottoms from 1,1,1 trichloroethane vapor separators (F001, D008, D007, D006)	10	toxic	TYPE I 1,1,1 trichloroethane 80 % solids 10 % oil/grease 10 % Pb,Cd,Cr TYPE II 1,1,1 trichloroethane 20 % solids 20 % oil/grease 60 % Pb,Cd,Cr	% Total solids; Pb,Cd,Cr VOCs	determine mgmt. options	C,GT,R (or T,GT,B if sludge is evident)	2	2 (4)
Steam cleaning wastewater (D004)	10	toxic	water 83-98 % oil 1 to 5 % solids (paint chips, dirt, etc.) 1 to 10 % detergent 2 % Pb 5 to 40 ppm	% Total solids; Pb	determine mgmt. options	G,GT,R	4	4
Wash cleaning compound (D001)	5	ignitable,	solvents (aliphatic HC) 75 to 85 % oil/grease 10 to 15 % solids* 5 to 10 %	pH; Flash point Pb,Cd,Cr	corrosivity determined by pH; known constituents	C,GT,R (or T,GT,B if sludge is evident)	4	4
Laquer thinning liquid (D001)	10	ignitable,	laquer thinner 80 to 90 % laquer 10 to 20 %	Flash point; Fuel value Pb,Cd,Cr	potentially ignitable; may be recoverable	C,GT,R (or T,GT,B if sludge is evident)	4	4
Paint thinning liquid (D001)	10	ignitable,	paint thinner	Flash point; Pb,Cd,Cr	potentially ignitable;	C,GT,R (or T,GT,B if sludge is evident)	4	4
Sludge	1	toxic	solvents 10-20 % oil, grease, and dirt 80-90 %	Pb,Cd,Cr	known constituents	T,GT,B	2	1

TAB. C-1
 CHARACTERISTICS OF WASTES GENERATED BY SEAD.
 RATIONALE FOR SAMPLING, AND FREQUENCY OF ANALYSES

WASTE	DRUMS/ YEAR	POTENTIAL HAZARD	TYPICAL % COMP		TEST PARAMETERS	RATIONALE	SAMPLER, CONTAINER, LOCATION (1)	FREQUENCY OF ANALYSIS	
								# OF GENERATION POINTS	MINIMUM ANNUAL TESTS
PCB WASTES									
Waste PCB hydraulic fluid (B003)	5	toxic	> 500 ppm PCBs (100%)		PCBs	determine management practices	C,G,T,R for liquids	5	5 (5)
Waste PCB hydraulic fluid (B002)	1	toxic	between 50 and 500 ppm PCBs (100%)		PCBs	determine management practices	T,G,T,R for solids		
PCB oil from transformers (B001)	3	toxic	between 50 and 500 ppm PCBs (100%)		PCBs	determine management practices	G,G,T,R for machine systems		
PCB oil from transformers (B001)	1	toxic	> 500 ppm PCBs (100%)		PCBs	determine management practices			
PCB articles electrical equipment	variable	toxic	capacitors, transformer carcasses, other suspected equipment		PCBs				
Residues from decon of IPE cloth rags coveralls, plastic sheets absorbent clay solvent w/residual PCB contamination (B004, B005, B006, B007)	variable	toxic	cloth rags	20 %	assumed > 500 ppm PCBs	determine management practices			
			coveralls, plastic sheets	10 %					
			absorbent clay	60 %					
			solvent w/residual	10 %					
			PCB contamination						
capacitor dielectric fluid (B002) (B003)	variable	toxic	between 50 and 500 ppm > 500 ppm PCBs		PCBs	determine management practices			
OTHER WASTES									
Spent battery acids (D006, D008, D002)	10	TCLP Pb,Cd corrosive	sulfuric acid water Pb,Cd	50-90 % 10-50 % 5-40 ppm	Pb,Cd,Cr pH	toxic conc. may leach; may be corrosive, determine storage options	C,G,T,H G,G,T,S	1	1
Paper wipes with spent acetone (F003)	3	ignitable; toxic	wipes acetone grease men packing mat'l	98 to 100 % 0 to 1 % 0 to 1 % 80 % (of drum)	(stored as ignitable)	potentially ignitable;	G,G,T,R	1*	1
								* for both acetone and toluene wipes	

TABLE C-1
CHARACTERISTICS OF WASTES GENERATED BY SEAD,
RATIONALE FOR SAMPLING, AND FREQUENCY OF ANALYSES

WASTE	DRUMS/ YEAR	POTENTIAL HAZARD	TYPICAL % COMP.	TEST PARAMETERS	RATIONALE	SAMPLER, CONTAINER, LOCATION (1)	FREQUENCY OF ANALYSIS	
							# OF GENERATION POINTS	MINIMUM ANNUAL TESTS
Paper wipes with spent toluene (FOCS)	3	ignitable; toxic	wipes toluene grease man packing mat'l * * waste was formerly overpacked in water to minimize ignitability hazard; presently packed in absorbant clay	98 to 100 % 0 to 1 % 0 to 1 % 80 % (of drum)	(stored as ignitable)	potentially ignitable;	G,GT,R	1
Unidentified liquids found on parts	5	variable	determined by analysis 100 % virgin materials determined by analyses (GC/MS, X-ray diffractive spectrometry, etc. (as appropriate)	pH Flash point Sb,As,Ba,Be,Cd, Cr,Co,Cu,Pb,Mn, Hg,Ni,Os,Se,Ag, Ti,V,Zn Pesticide, Fuel value VOCs and PCBs	may be corrosive; potentially ignitable; may contain toxic levels of metals; may be a stray drum; may be recoverable; known constituent; may contain toxic levels	G C,GT,R	varies (6)	each container
Misc. oil specs, excess, or expired stuff - the hazardous material (NOT MIXTURES FOR INCINERATION) old paint cans, leaking drums, waste primer, expired stock, etc.)	10	variable	variable	variable	variable	variable	variable	variable
INCINERATED WASTES								
Dust collected from APE 1236 as pollution control device (includes fused ash pieces and ash contaminated bags from baghouse)	10 (7)	TCLP Ba Pb corrosive (8)	ash residue Ba Ag, Cr Cd Pb (9)	99.95 % 300-400 ppm 0 to 5 ppm 0 to 1 ppm 0 to 5 ppm	Ba, Pb Ag, Cd, Cr	known constituents; incinerated materials were reactive	T (or Inlet), G	1
								1
Scrap metal (castings) and ash residue	(7)	TCLP	brass steel ash residue heavy metal contaminants	(10)	Sb,As,Ba,Be,Cd, Cr,Co,Cu,Pb,Mn, Hg,Ni,Os,Se,Ag, Ti,V,Zn	determine mgmt. options (i.e. recycleable)		1

Tab. C-1
CHARACTERISTICS OF WASTES GENERATED BY SEAD,
RATIONALE FOR SAMPLING, AND FREQUENCY OF ANALYSES

WASTE	DRUMS/ YEAR	POTENTIAL HAZARD	TYPICAL % COMP	TEST PARAMETERS	RATIONALE	FREQUENCY OF ANALYSIS	
						SAMPLER, CONTAINER, LOCATION (1)	# OF GENERATION POINTS
MIXED WASTES (1) (F001 - F005, R001)							
Paper wipes contaminated with toluene and low level radioactive waste	1	radioactive, toxic	wipes toluene	95-100 % 0-1 %			
Paper wipes contaminated with acetone and low level radioactive waste	1	radioactive, toxic	wipes acetone	95-100 % 0-1 %			
Paper wipes contaminated with krypton and low level radioactive waste	1	radioactive, toxic	wipes krypton	95-100 % 0-1 %			
Paper wipes contaminated with isopropanol and low level radioactive waste	1	radioactive, toxic	wipes isopropanol	95-100 % 0-1 %			
Paper wipes contaminated with trichloroethylene and low level radioactive waste	1	radioactive, toxic	wipes trichloroethylene	95-100 % 0-1 %			

NOTES

(1) Samples - C = Colwasa

- T = Trier

- G = Grab

Container - GT = Glass, teflon lined lid

- P = Polyethylene

Location - B = Bi-layered (Two (2) samples)

- S = Surface

- R = Multilayered, nonhomogeneous random location

- H = Homogeneous

(2) Not all paint booths generate a drum per year; 9 tests minimum
if all location generate a drum per year.

(3) Same as (2) only 5 tests if all locations generate a drum per year.

(4) May generate a drum per year, may be serviced by offsite recycling.

(5) Four shops may generate PCB waste solvents, oils and solids from
decontamination of IPE. Bldg. 301 is included here as a "generation"
point for purposes of frequency of analyses. All electrical
equipment is suspected of containing PCBs and is tested (minimum = 1 test/year).

(6) Seneca discussed management of "unidentified liquids and mystery drums"
in the May 1, 1987 response, specifically comments C-7 and F-12. Given a
prior review of compatibility, "unidentified" materials are stored in conforming
storage pending verification of container markings and/or analytical determination
of contents. Containers which show some damage or corrosion, or have reasonable
doubt with respect to contents are overpacked prior to storage. It should be noted
here that Seneca stores known, changing variety of hazardous materials, which may
be determined wastes due to expired shelf-life, off-specifications materials, or
perhaps an unaccounted for container. If such a material is unusable or unseparable,
it needs to be properly managed as a hazardous waste.

Attachment B

BUILDING 803 - MIXED WASTE LIST

Barrel #	Mixed W/	FDA Waste Code	RAD Waste Code	RAD Isotope	(CFM)
93-2	Alcohol	D001	R001	U-238	600
93-1	Trichlor	U228	R001	U-235	200K
6-07	Unk	F003/D001	R001	U-235	6.4K
10-88	Unk	F003/D001	R001	U-238	1K
9-89	Unk	F003/D001	R001	U-235	120K
0-89	Unk	F003/D001	R001	U-235	240K
7-89	Unk	F003/D001	R001	U-235	35K
1-87	Unk	F003/D001	R001	U-238	1.4K
6-89	Unk	F003/D001	R001	U-235	370K
7-90	Alcohol	D001	R001	U-235	70K
10-89	Unk	F003/D001	R001	U-235	40K
5-88	Unk	F003/D001	R001	U-235	100K
8-80	Unk	F003/D001	R001	U-235	60K
2-90	Unk	F003/D001	R001	U-238	3.5K
8-90	Freon/ Alcohol	F002/D001	R001	U-238	2K
7-85	Paint Stripper	D001	R001	U-235	

↑
accn.
date

1177904

ENVIROCARE OF UTAH, INC.
THE SAFE ALTERNATIVE

August 30, 1995

FAX TRANSMISSION

Mr. Bill Metcalf
HQ, Army IOC
AMSIO-ACE-D
Rock Island, IL 61299-6000

Dear Mr. Metcalf,

Envirocare has received the Profile information for the Seneca Army Depot waste stream. Envirocare has managed similar waste for the Air Force in the past. After a preliminary review of this information, it appears that these materials are acceptable for treatment and disposal at the Clive facility. When a final determination has been made, I will contact you.

I hope this information is helpful to you. Please contact me with any additional questions or concerns.

Best regards,



Kevin G. Fuller
Project Manager

NATURE SAVER™ FAX MEMO 01616		Date	8/30	of pages	1
To	Bill Metcalf	From	Kevin F.		
Co./Dept	TOC	Co.	EC		
Phone #	309-793-2969	Phone #			
Fax #	309-782-2988	Fax #			

2245

46 WEST BROADWAY • SUITE 240 • SALT LAKE CITY, UTAH 84101 • TELEPHONE (801) 532 1330

TOTAL P. 01

SEP-26-95 TUE 13:45

New York State Department of Environmental Conservation

Region 8

6274 East Avon-Lima Road, Avon, NY 14414-9519

Telephone: 716-226-2466



Michael D. Zagata
Commissioner

November 7, 1996

Mr. Thomas Grasek
Environmental Engineer
Seneca Army Depot
Route 96
Romulus, New York 14581

Dear Mr. Grasek:

RE: Hazardous Waste Compliance Inspection Date: 10/10/96
Location of Handler: Same as Above
EPA Identification No.: NYD0213820830

In order to determine compliance with the New York State Hazardous Waste Regulations, an inspection of your facility was conducted on the above-referenced date.

As a result of that inspection, I believe that your facility is operating as a generator and a treater, storer and/or disposer of hazardous waste.

✓ No violations of the New York State Hazardous Waste Regulations were observed on the inspection date referenced above. Please be advised that your facility is under the continuing obligation to comply with all the applicable state and federal regulations regarding the management of hazardous waste including any liability you may have for any regulatory fees and hazardous waste special assessment fees.

Should you have any questions, please contact me at the above telephone number. Your efforts to fully comply with our hazardous waste regulations are appreciated. A copy of the Inspection Report is enclosed for your records.

Sincerely,

Michael Khalil, P.E.
Environmental Engineer
Division of Solid & Hazardous Materials

MK:map

Enclosure

cc: S. Carlomagno - NYSDEC, Albany
B. Knapp - NYSDEC, Albany



INSPECTION FORM

CESQG	---
SOQ	---
GENERATOR	<u>X</u>
TSDf	<u>X</u>
OTHER	---
UNANNOUNCED	---
ANNOUNCED	<u>X</u>

NEW YORK STATE INDUSTRIAL HAZARDOUS WASTE MANAGEMENT ACT
(Chapter 639, Laws of 1978)

Prepared for: Commissioner
NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Send to: NYSDEC
Division of Solid and Hazardous Materials
Compliance Inspection Section
50 Wolf Road - Room 436
Albany, New York 12233-7253

EPA I.D. NUMBER: N Y 0 2 1 3 8 2 0 8 3 0

COMPANY NAME (Corporate): SENECA ARMY DEPOT

(Division): _____

COMPANY MAILING ADDRESS: ROUTE 96

City & State ROMULUS, NY Zip Code 14581

COMPANY LOCATION ADDRESS: _____

(if different than mailing) _____

City & State _____, NY Zip Code _____

COMPANY TELEPHONE NUMBER: (607) 869-1281 Extension _____

FULL NAME OF COMPANY CONTACT: MR. TOM GRASEK

TITLE OF COMPANY CONTACT: ENVIRONMENTAL ENGINEER

INSPECTION DATE: 10/10/1996 TIME OF INSPECTION: 10:00(a.m.) _____ (p.m.)

INSPECTOR'S NAME: MICHAEL KHALIL

NAME: _____

REPORT PREPARED BY: MICHAEL KHALIL, P.E. DATE: 10/11/1996

REPORT APPROVED BY: DIXON ROLLINS, P.E. *Dixon Rollins* DATE: 10/21/96

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APPENDICES

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Part I

General Information and Classification of Facility

1. Identification of Hazardous Waste - 371 Yes No

A. Facility generates and/or stores hazardous waste on-site. Yes X No

(1) X Company filed a RCRA hazardous waste notification and/or Part A of RCRA permit application.

(2) X Company has used knowledge of the hazardous characteristic of the waste to determine if it is hazardous.

(3) X Testing has shown characteristics of:

- (X) Ignitability (D001) - 371.3(b)
- (X) Corrosivity (D002) - 371.3(c)
- (X) Reactivity (D003) - 371.3(d)
- (X) Toxicity (D004 - 043) - 371.3(e)

(4) X The material is listed in the regulations as a hazardous waste from non-specific sources (F-Waste). 371.4(b).

(5) The waste is listed in the regulations as a hazardous waste from specific sources (K-Waste). 371.4(c).

(6) The material is listed in the regulations as an acute hazardous waste (P-Waste). 371.4(d)(5).

(7) X The material or product is listed in the regulations as a discarded commercial chemical product, off-specification species or manufacturing chemical intermediate (U-Waste). 371.4(d)(6).

(8) X The material is listed in the regulations as a waste containing PCBs (B-Waste). 371.4(e).

B. The company notified EPA as a:

GENERATOR & TSDF

Has EPA or DEC officially modified the company's status? Yes No X
If yes, attach correspondence.

C. If the facility is a treatment, storage or disposal facility, have they:

Submitted a Part A application.

Should the Part A be modified by the Company? If so, explain.

Submitted a Part 373 permit application.

Been granted a Part B permit.* expiration date: _____

Been granted a Part 373 permit or operating under SAPA with a Part 360 permit.* expiration date: _____

*Complete Appendix C - indicate compliance status with permit conditions.

D. Is the facility operating under a consent order?**

Have they signed a consent order to resolve violations found during a previous inspection?**

**Complete Appendix D and indicate compliance with each condition of the order.

2. Exemptions

A. Generator Exemptions

(1) Not a regulated handler because:

(a) Never generated any hazardous waste.

(b) No hazardous waste generated within the last 3 years.

(c) Company moved in _____ to _____
(date) (location)

(d) Company out-of-business.

(e) Company sold to _____
(new owner)

(2) Samples collected for testing - 372.1(e)(5).

(3) Residues of hazardous waste in empty containers - 372.1(e)(6).

(4) A hazardous waste which is generated in a product or raw material storage tank, a product or raw material transport vehicle or vessel, a product or raw material pipeline, or in a manufacturing process unit or an associated non-waste treatment manufacturing unit is not subject to regulation until it exits the unit in which it was generated, unless the unit is a surface impoundment.

or unless the hazardous waste remains in the unit more than 90 days after the unit ceases to be operated for manufacturing, or for storage or transportation of product or raw materials - 372.1(e)(7)(i).

B. TSD Exemptions

- (1) Storage of hazardous waste that is generated on-site in containers or tanks for a period not exceeding 90 days. Other than the storage of liquid hazardous waste over the designated sole source aquifers - 373-1.1(d)(1)(iii).
- (2) Storage in containers or tanks of liquid hazardous waste generated on-site over the designated sole source aquifers for a period not exceeding 90 days. These storage areas must comply with the requirements of this exemption whenever any quantity of liquid hazardous waste is stored in tanks, or whenever the total quantity of liquid hazardous waste stored on-site in containers exceeds 185 gallons - 373-1.1(d)(1)(iv).
- (3) The on-site storage and treatment of hazardous waste by generators that generate less than 100 kilograms of hazardous waste in any calendar month and store less than 1,000 kilograms. The conditionally exempt small quantity generator requirements listed in subdivision 371.1(f) of this Title remain applicable. If at any time the amount of hazardous waste exceeds 1,000 kilograms, this exemption does not apply. This exemption applies to the on-site storage and treatment of acute hazardous wastes only if the generator generates and stores in any calendar month such acute hazardous waste in quantities less than those listed in 373-1.1(d)(1)(i)(b) of this paragraph - 373-1.1(d)(1)(v).
- (4) The storage and recycling of the recyclable materials identified in subparagraphs 371.1(g)(1)(iii) and (iv) of this Title - 373-1.1(d)(1)(vi).
- (5) The storage of the following recyclable materials is exempt from permitting provided that Subpart 374-1 is complied with. (NOTE: Subpart 374-1 will require that the facility also complies with selected sections of this Part.) - 373-1.1(d)(1)(vii):
 - (a) recyclable materials used in a manner constituting disposal (see section 374-1.3);
 - (b) hazardous wastes burned for energy recovery in boilers and industrial furnaces that are not regulated under section 373-2.15 or 373-3.15 of this Title (see section 374-1.8);
 - (c) recyclable materials from which precious metals are reclaimed (see section 374-1.6);
 - (d) spent lead-acid batteries that are being reclaimed (see section 374-1.7).
- (6) The recycling of hazardous wastes is exempt from permitting provided 373-2.2(c) (identification number), 372.4(b) (use of manifest system), 372.4(d)(1) (manifest discrepancies) and

Clause 373-1.1(d)(1)(viii)(g) are complied with. (Storage of hazardous waste prior to recycling is not exempt under this subparagraph.) In addition: 373-1.1(d)(1)(viii):

- (a) ___ This exemption is available to:
 - (1) ___ Commercial facilities that reclaim precious metals, as defined in 374-1.6 of this Title;
 - (2) ___ Mobile or transportable commercial facilities which operate on the generator's site, if a containment area, meeting the requirements of 373-2.9(f), is provided for the reclaiming facility and any associated, temporary container holding or storage area.
- (b) ___ This exemption is not available to any units, other than boilers and industrial furnaces, that burn hazardous wastes for energy recovery.
- (c) ___ Exempted processes that recycle the hazardous wastes listed in 2B(5)(a-d) must comply with Part 374 of this Title in lieu of the requirements specified in this subparagraph. (Note: Part 374 will require that the facility also complies with selected sections of this Part.)
- (d) ___ Owners or operators of facilities subject to RCRA permitting requirements with hazardous waste management units that recycle hazardous waste are subject to the requirements of sections 373-2.27, 373-2.28, 373-3.27 and 373-3.28 of this Part.
- (7) ___ The on-site treatment of hazardous waste, by the generator, in the same tanks or containers used for accumulation and storage is exempt provided the generator complies with Part 373-1.1(d)(1)(iii) and (iv) and Part 372.2(c)(4). Any treatment or placement of hazardous waste in a manner that constitutes land disposal, as defined in subdivision 370.2(b), does not qualify for this exemption - 373-1.1(d)(1)(ix).
- (8) ___ Totally enclosed treatment facility - 373-1.1(d)(1)(xi).
- (9) ___ Elementary neutralization units or wastewater treatment units, as defined in Part 370 of this Title, other than units that are part of commercial hazardous waste management facilities as defined in Part 370 of this Title. Elementary neutralization units and wastewater treatment units located at commercial hazardous waste management facilities that are only used to neutralize or treat hazardous waste resulting from the recycling of hazardous wastes or from the reclamation of precious metals from hazardous wastes are also exempt. Elementary neutralization units and wastewater treatment units that are used to commercially neutralize or treat hazardous wastes, generated only at geographically continuous sites, and transported via dedicated pipeline are also exempt - 373-1.1(d)(1)(xii).

(10)___ Accumulation areas are exempt, provided that they are used to accumulate waste in accordance with the requirements of subparagraph 372.2(a)(8)(i) of this Title 373-1.1(d)(1)(xiv).

(11)___ A transporter storing manifested shipments of hazardous waste in containers meeting the requirements of paragraph 372.2(a)(4) of this Title at a transfer facility for a period of ten calendar days or less is exempt, provided that the transfer facility is not located on the site of any commercial hazardous waste treatment, storage or disposal facility subject to permitting under this Part. Complete Part VII - 373-1.1(d)(1)(xi).

3. Hazardous Waste Generation/Treatment/Storage/Disposal

A. Describe only the activities that result in the generation of hazardous waste. Include manufacturing processes that generate hazardous waste. [Do not include hazardous waste treatment processes.]

WASTE STREAMS GENERATED FROM MAINTENANCE OF EQUIPMENT AND
CLEANING & CLOSING OF BUILDINGS AND OPERATIONS. THE BASE IS
IN THE CLOSING MODE AND FULL SHUT DOWN IS EXPECTED IN THE
YEAR 2001.

B. Describe any on-site hazardous waste treatment processes that result in the generation of hazardous waste (exempt and/or nonexempt). Include process diagrams if available.

N/A

C. Identify the hazardous wastes that are on-site, the quantity of each, the storage method, the type and size of containers or tanks used and their location in the storage area. (Be as specific as possible.)

(1) Accumulation Areas [NOTE: Waste in accumulation areas must be included as part of the total quantity of waste on-site]:

N/A

(2) Container Storage Areas for CESQG, SQG or Generator*

N/A

(3) Tank Storage Areas for CESQG, SQG or Generator*

N/A

- * CESQG - unlimited storage time provided less than 1,000 kg is stored on-site.
- SQG - 180 days (or 270 if TSD is over 200 miles away) and less than 6,000 kg is stored on-site.
- Generator - 90 days or less storage.

(4) Interim Status/Permitted Container Storage Areas:

BLDG. 301 PCB STORAGE ROOM EMPTY

BLDG. B03 MIXED WASTE ROOM EMPTY

BLDG. 307 SEE ATTACHMENT 1

(5) Interim Status/Permitted Tank Storage Areas:

N/A

- (6) Any other treatment, storage or disposal units such as lagoons, surface impoundments, landfills, waste piles, incinerators, energy recovery units, or underground injection units:

N/A

4. Status Identification:

A. Generator Status

- (1) ___ Conditionally Exempt Small Quantity Generator (CESQG) - generates less than 100 kg/mo of non-acute hazardous waste or 1 kg/mo of acute hazardous waste. Complete Part III - 372.1(f)(6), 371.1(f)(7).
- (2) ___ Small Quantity Generator (SQG) - generates more than 100 kg/mo but less than 1,000 kg/mo of non-acute hazardous, and accumulates no more than 6,000 kg of non-acute hazardous waste on-site. Complete Part IV - 372.2(a)(8)(iii).
- (3) X Generator - generates more than 1,000 kg/mo of non-acute hazardous waste or generates more than 1 kg of acute hazardous waste in a calendar month. Complete Part V - 372.2(a)(8)(ii).

B. Treatment, Storage or Disposal Facility (TSDF)

- (1) X Hazardous waste is stored greater than 90 days.*,**
- (2) ___ Hazardous waste is received from off-site and not beneficially used, reused or legitimately recycled or stored.*
- (3) X Hazardous waste is treated on-site in non-exempt units.*
- (4) ___ Hazardous waste is disposed of on-site.*

* (If checked Complete Part VI and/or appropriate Appendices)

** (Do not complete for generators only that have exceeded the 90 day storage limit.)

C. Transporter Status

Yes ___ No X Hazardous waste is transported by this company.

If Yes, Complete Part VII

Permit No. _____

Part V

LARGE QUANTITY GENERATOR

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

The generator who generates 1,000 kilograms or more per month of non-acute hazardous waste or generates greater than 1 kg per month of acute hazardous waste has complied with the following:

1. General Requirements

- (a) ___ The generator has made a determination as to whether or not his solid waste is a hazardous waste - 372.2(a)(2). X
- (b) ___ The generator has obtained an EPA identification number - 372.2(a)(3). X
- (c) ___ Before transporting or offering hazardous waste for * transportation off-site the generator has packaged the waste in accordance with the applicable USDOT regulations - 372.2(a)(4). N/A
- (d) ___ Before transporting or offering hazardous waste for * transportation off-site the generator has labeled each package of waste in accordance with the applicable USDOT regulations - 372.2(a)(5). N/A
- (e) ___ Before transporting or offering hazardous waste for * transportation off-site the generator has marked each container or package of waste properly - 372.2(a)(6). N/A

* Note: This does not apply to drums in storage.

2. Accumulation Area Requirements - 372.2(a)(i)

- (a) ___ The containers appear to be in good condition and are not in danger of leaking - 373-3.9(b). N/A
- (b) ___ Hazardous waste is stored in containers made of compatible materials - 373-3.9(c). N/A
- (c) ___ All containers except those in use are closed - 373-3.9(d)(1). N/A
- (d) ___ Containers holding hazardous waste must not be opened, handled or stored in a manner which may rupture the containers or cause them to leak - 373-3.9(d)(2). N/A
- (e) ___ Containers are marked with the words "Hazardous Waste" and with other words that identify the contents of the containers - 372.2(a)(8)(i)(a)(2). N/A

Indicate:

Indicate:

X Violations

X Satisfactory
NA Not Applicable

(f) ___ Hazardous waste may be accumulated in excess of 55 gallons or 1 quart of acutely hazardous waste at or near the point of generation provided that Section 372.2(a)(8)(ii) requirements are met within 3 days, and the container holding the excess accumulation is marked with the date the excess amount began accumulating - 372.2(a)(8)(i)(b). N/A

3. 90 Day Storage - 372.2(a)(8)(ii)

(a) ___ All wastes are shipped off-site to an authorized treatment, storage or disposal facility (TSDF) in 90 days or less - 372.2(a)(8)(ii). N/A

(b) ___ The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container - 372.2(a)(8)(ii), 373-1.1(d)(1)(iii)(c)(2), 373-1.1(d)(1)(iv)(d). X

Container Storage Requirements (This section will also be completed for TSDF's as referred from Part VI.)

(c) ___ The containers appear to be in good condition and are not in danger of leaking. (If containers are leaking, describe the type, condition, contents and number that are leaking or corroded. Be detailed and specific) - 373-3.9(b). X

(d) ___ Hazardous waste is stored in containers made of compatible materials - 373-3.9(c). (If not, please explain.) X

(e) ___ All containers except those in use are closed - 373-3.9(d)(1). X

(f) ___ Containers holding hazardous waste must not be opened, handled or stored in a manner which may rupture the containers or cause them to leak - 373-3.9(d)(2). X

(g) ___ Each container is marked with the words "Hazardous Waste" and with other words to identify the contents 373-3.9(d)(3). X

(h) ___ The containers and storage area are inspected at least weekly - 373-3.9(e). X

X Violations

X Satisfactory
NA Not Applicable

- (i) The generator complies with the following special requirements related to storage of ignitable or reactive wastes - 373-3.9(f): X
 - (1) Containers holding ignitable or reactive waste are located at least 15 meters (50 feet) from the facility property line - 373-3.9(f). X
 - (2) Generator has taken precautions to prevent accidental ignition or reaction of ignitable or reactive waste by separating and protecting such waste from sources of ignition or reaction - 373-3.2(h)(1). X
 - (3) Generator has placed "No Smoking" signs conspicuously wherever there is a hazard from ignitable or reactive waste - 373-3.2(h)(1). X
- (j) The generator complies with the following special requirements related to incompatible wastes - 373-3.9(g): N/A
 - (1) Incompatible wastes, or incompatible wastes and materials, are not placed in the same container, or in an unwashed container that previously held an incompatible waste or material unless the placement is conducted to prevent the following - 373-3.9(g)(1) & (2): N/A
 - (a) the generation of extreme heat or pressure, fire or explosion, or violent reaction - 373-3.2(h)(2)(i); N/A
 - (b) production of uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to pose a risk of fire or explosions - 373-3.2(h)(2)(ii); N/A
 - (c) production of uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions - 373-3.2(h)(2)(iii); N/A
 - (d) damage to the structural integrity of the device or facility containing the waste - 373-3.2(h)(2)(iv); or N/A
 - (e) a threat to human health or the environment - 373-3.2(h)(2)(v). N/A
 - (2) Containers holding a hazardous waste that is incompatible with any waste or other materials stored nearby in other containers, piles, open tanks, or surface impoundments must be separated from the other materials or protected from them by means of a dike, berm, wall, or other device - 373-3.9(g)(3). N/A
- (k) Special requirements for generators of liquid hazardous waste over sole source aquifers or generators that store more than 8,800 gallons of liquid hazardous waste - 373-1.1(d)(1)(iii), 373-1.1(d)(1)(iv). N/A

INDICATE.

INDICATE.

X Violations

X Satisfactory
NA Not Applicable

- (1) The container storage areas are within a secondary containment system designed and operated in accordance with the following* - 373-1.1.(d)(1)(iv)(f): N/A
- (a) The base under the containers must be free of cracks or gaps and sufficiently impervious to contain collected material until it is removed - 373-2.9(f)(1)(i). N/A
- (b) The base must be sloped or the containment system otherwise designed and operated to drain and remove liquid unless the containers are elevated or protected from contact with accumulated liquids - 373-2.9(f)(1)(ii). N/A
- (c) The containment system must have sufficient capacity to contain 10 percent of the volume of containers or the volume of the largest container, whichever is greater. Containers that do not contain free liquids are not considered in this determination - 373-2.9(f)(1)(iii). N/A
- (d) Run-on is prevented unless the system has sufficient excess capacity over that required in (3) - 373-2.9(f)(1)(iv). N/A
- (e) Accumulated waste and precipitation must be removed as necessary to prevent overflow - 373-2.9(f)(1)(v). N/A

* This requirement does not apply to generators of liquid hazardous waste over a sole source aquifer if the container storage volume does not exceed 185 gallons.

- (2) The generator of liquid hazardous waste over a sole source aquifer has a written closure plan - 373-3.7(c)(1). N/A
- (3) The closure plan identifies the steps necessary to perform partial and/or final closure of the facility at any point during its active life. The closure plan must contain the information required by 373-3.7(c)(2)(i) - (vii)** - 373-3.7(2)(c). N/A

** If a violation is checked, please attach a sheet listing the deficiencies in the closure plan.

4. Tank Storage Requirements - 373-3.10

1. N/A Generators must complete Appendix E*, except for 373-3.10(h)(3) Items 11C1 through 5. In addition, 373-3.7 and 3.8 which are cross-referenced do not apply except for 373-3.7(b) and (e).
2. N/A Generators over sole-source aquifers complete Appendix E, except for 373-3.10(h)(3), Items 11C1 through 5 and 373-3.8 (financial requirements).

* Note: Generators storing less than 185 gal of liquid hazardous waste in tanks, do not have to comply with secondary containment requirements given in Appendix E (Pages E-7 to E-10).

INDICATE.

X Violations

INDICATE.

X Satisfactory
NA Not Applicable

5. Manifest, Reporting and Recordkeeping Requirements

- (a) Hazardous waste is shipped off-site with an accompanying manifest - 372.2(b)(5)(i). X

If "violation" is checked, please elaborate.

- (b) List the frequency of shipments and the amount of waste per shipment.

SEE ATTACHMENT 2

- (c) The transporter has a valid Part 364 permit or is otherwise authorized to transport the waste to the designated facility - 372.2(b)(5)(ii). X

List transporter and permit number.

SEE ATTACHMENT 2

- (d) The generator offers for shipment or ships hazardous waste to an authorized facility. - 372.2(b)(5)(iii). X
If violation, list names of any unauthorized facilities.

- (e) Each manifest is completed in accordance with the instructions found in Appendix 30 of Part 372 - 372.2(b)(1). [Indicate items in violation]

	Generator	Trans 1	2	TSDf	
(1) <input type="checkbox"/> Name of	<u>X</u>	<u>X</u>	<u> </u>	<u>X</u>	<u>X</u>
(2) <input type="checkbox"/> EPA ID No. of	<u>X</u>	<u>X</u>	<u> </u>	<u>X</u>	<u>X</u>
(3) <input type="checkbox"/> Mailing Address of	<u>X</u>	<u> </u>	<u> </u>	<u>X</u>	<u>X</u>
(4) <input type="checkbox"/> Telephone No. of	<u>X</u>	<u>X</u>	<u> </u>	<u>X</u>	<u>X</u>
(5) <input type="checkbox"/> Manifest Document #	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u>X</u>
(6) <input type="checkbox"/> The proper USDOT description.	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u>X</u>

INDICATE.

INDICATE.

X Violations

X Satisfactory
NA Not Applicable

- (7) The appropriate: X quantity, X container number, X container type, and X waste type by units of weight or volume. X
- (8) Signed certification that the materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation under regulations of the USDOT and NYSDEC. X
- (f) The generator has received signed copies (from the TSD facility) of all manifests for wastes shipped off-site more than 35 days ago: X
- If not, exception reports have been submitted covering these shipments - 372.2(c)(3). N/A
- (g) The generator must distribute copies of the manifest as specified on the manifest form, postmarked within five (5) business days of the shipment date - 372.2(b)(3). X
- (h) For international shipments the generator has done the following - 372.2(b)(4)(i):
- (1) The EPA and the Department have been notified 60 days prior to shipment of the hazardous waste destined for treatment, storage or disposal outside the United States - 372.5(c)(1). N/A
- (2) Delivery of the wastes has been confirmed by the consignee within 90 days of acceptance by initial transporter - 372.5(e)(2). N/A
- (3) Primary exporters of hazardous waste must file with the Administrator and the Department no later than March 1 of each year, a report summarizing the types, quantities, frequency, and ultimate destination of all hazardous waste exported during the previous calendar year - 372.5(f)(1). N/A
- (i) The generator has complied with the requirements of Section 372.6 for interstate shipments - 372.2(b)(4)(ii) X
- (j) The generator has complied with the requirements for shipping by rail or water (bulk) found in Section 372.7 - 372.2(b)(4)(iii). N/A
- (k) A copy of each manifest has been kept for at least three years from the date the waste was accepted by the initial transporter - 372.2(c)(1)(i) X
- (l) A copy of each Annual Report and Exception Report must be kept for a period of at least three years from the due date of the report - 372.2(c)(1)(ii). X

VIOLATIONS.

COMPLIANCE.

X Violations

X Satisfactory
NA Not Applicable

- (m) ___ A generator must keep records of any test results, waste analyses, or other determinations made in accordance with Part 372.2(a)(2) for at least three years - 372.2(c)(1)(iii). X
- (n) ___ All records required under subdivision 372.2(c) were furnished upon request, or made available at a reasonable time for inspection - 372.2(c)(1)(iv). X
- (o) ___ There is written communication that the designated treatment, storage or disposal facility is an authorized treatment, storage or disposal facility for the particular wastes being offered for shipment and has capacity to accept the hazardous waste set forth on the manifest and will assure the ultimate disposal method is followed - 372.2(b)(2)(i). X
- (p) ___ There is written communication that the designated transporter is authorized to deliver the waste to the facility on the manifest - 372.2(b)(2)(ii). X
- (q) ___ A generator who ships hazardous waste off-site to a treatment, storage or disposal facility located within the United States must submit an Annual Report on forms specified by the Commissioner - 372.2(c)(2). X

6. Personnel Training - 373-3.2(g)

- (a) ___ The following documents and records are maintained at the facility - 373-3.2(g)(4): X
- (1) ___ the job title for each position at the facility related to hazardous waste management and name of the employee filling each job - 373-3.2(g)(4)(i); X
- (2) ___ a written job description for each position - 373-3.2(g)(4)(ii); X
- (3) ___ a written description of the type and amount of both introductory and continuing training that will be given to each person related to hazardous waste management - 373-3.2(g)(4)(iii); and X
- (4) ___ records that document that the training or job experience required has been given to and completed by facility personnel - 373-3.2(g)(4)(iv). X
- (b) ___ The training program is directed by a person trained in hazardous waste management procedures and must include instruction which teaches facility personnel hazardous waste management procedures (including _____). X

X Violations

X Satisfactory
NA Not Applicable

contingency plan implementation) relevant to the positions in which they are employed. The components are - 373-3.2(g)(1)(i), (ii) and (iii):

- (1) Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment; X
- (2) Key parameters for automated waste feed cutoff systems; N/A
- (3) Communications or alarm systems; X
- (4) Response to fires and explosions; X
- (5) Response to groundwater contamination incidents; and N/A
- (6) Shutdown of operations. X
- (c) Facility personnel have successfully completed the program by the effective date of these regulations or six months after the date of their employment - 373-3.2(g)(2). X
- (d) Facility personnel have taken part in an annual review of the initial training required - 373-3.2(g)(3). X
- (e) Training records on current personnel have been kept permanently at the facility (until closure) - 373-3.2(g)(5). X
- (f) Training records on former employees have been kept for at least three years from the date the employee last worked at the facility - 373-3.2(g)(5). X

7. Preparedness and Prevention 373-3.3

- (a) The facility is maintained and operated to minimize the possibility of a fire or explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water - 373-3.3(b). X
- (b) The facility must be equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment specified below - 373-3.3(c): X
 - (1) An internal communication or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel - 373-3.3(c)(1); X

X Violations

X Satisfactory
NA Not Applicable

- (2) A device, such as a telephone (immediately available at the scene of operations) or a hand-held, two-way radio capable of summoning emergency assistance from local police departments, fire departments, or State or local emergency response teams - 373-3.3(c)(2); X
- (3) Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment - 373-3.3(c)(3); and X
- (4) Water at adequate volume and pressure to supply water hose streams, or foam-producing equipment, or automatic sprinklers, or water spray systems - 373-3.3(c)(4). X
- (c) Facility communications or alarm systems, fire protection equipment, and spill control equipment are tested and maintained as necessary to assure their proper operation in time of emergency - 373-3.3(d). X
- (d) Personnel involved in hazardous waste operations have immediate access to an internal alarm or emergency communication device - 373-3.3(e). X
- (e) The owner or operator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency unless aisle space is not needed for any of these purposes - 373-3.3(f). X
- (f) The facility owner or operator has attempted to make the following arrangements as appropriate with local authorities for the type of waste handled at the facility and the potential need for the services of these organizations - 373-3.3(g)(1): N/A
 - (1) Arrangements to familiarize police, fire departments and emergency response teams with the functions and layout of the facility - 373-3.3(g)(1)(i); N/A
 - (2) Where more than one police and fire department might respond to an emergency, an agreement designating primary emergency authority to a specific police and a specific fire department, and agreements with any others to provide support to primary emergency authority - 373-3.3(g)(1)(ii); N/A
 - (3) Agreements with State emergency response teams, emergency response contractors, and equipment suppliers - 373-3.3(g)(1)(iii); and N/A
 - (4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could N/A

X Violations

X Satisfactory
NA Not Applicable

result from fires, explosions or releases at the facility - 373-3.3(g)(1)(iv).

(g) Where state or local authorities decline to enter into such arrangements, the owner or operator has documented the refusal in the operating record - 373-3.3(g)(2). N/A

8. Contingency Plan - 373-3.4

(a) The facility has a contingency plan or some other emergency plan which incorporates hazardous waste management - 373-3.4(b)(1). X

(b) If the facility has a Spill Prevention, Control, and Countermeasure Plan (SPCC) or some other emergency plan, that plan need only be modified to incorporate hazardous waste management provisions that are sufficient to comply with the Contingency plan requirements - 373-3.4(c)(2). X

(c) The following are included in the contingency plan - 373-3.4(c): X

(1) A description of the actions facility personnel must take in response to fires, explosions or any unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil or surface water; 373-3.4(c)(1). X

(2) A description of arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services; 373-3.4(c)(3). X

(3) Names, addresses and office and home phone numbers of all persons qualified to act as emergency coordinator; 373-3.4(c)(4). X

(4) An up-to-date list of all emergency equipment at the facility, and decontamination equipment, where this equipment is required; 373-3.4(c)(5). X

(5) The location and a physical description of each item on the list, and a brief outline of its capabilities; 373-3.4(c)(5). X

(6) An evacuation plan for facility personnel, where there is a possibility that evacuation could be necessary - 373-3.4(c)(6). X

(c) Copies of the contingency plan are maintained at the facility - 373-3.4(d)(1). X

(d) Copies of the contingency plan have been submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams N/A

VIOLATIONS

STATUS

X Violations

X Satisfactory
NA Not Applicable

that may be called upon to provide emergency services - 373.3.4(d)(2).

(e) ___ The contingency plan has been amended, as necessary, when applicable regulations were revised, the plan failed in an emergency, the facility changes or the list of emergency coordinators or equipment changes - 373-3.4(e). X

(f) ___ There is at least one employee either on the facility premises or on call with the responsibility and authority for coordinating all emergency response measures. This emergency coordinator must be thoroughly familiar with all aspects of the contingency plan, all operations and activities, the facility layout, the location and characteristics of all wastes handled and the location of all records - 373-3.4(f). X

9. Emergency Procedures - 373-3.4(g)

(a) ___ During a past emergency situation the emergency coordinator (or his designee when the emergency coordinator is not on call) immediately activated emergency procedures - 373-3.4(g).* N/A

*Do not go back further than the previous inspection date.

(b) ___ The following was done:

(1) ___ Activated internal facility alarms or communication systems; N/A

(2) ___ Notified appropriate state or local agencies; N/A

(3) ___ Immediately identified the character, exact source, amount and areal extent of any released materials; N/A

(4) ___ The emergency coordinator assessed possible hazards to human health and the environment; N/A

(5) ___ The emergency coordinator, after determining that the facility had a release, fire or explosion which could threaten human health or the environment outside the facility, reported his findings; N/A

(6) ___ During the emergency, the emergency coordinator took all reasonable measures necessary to ensure that fire, explosions and releases do not occur, recur or spread to other hazardous waste; N/A

(7) ___ The emergency coordinator monitored for leaks, pressure buildup, gas generation or ruptures in valves, pipes or other equipment, where appropriate during the facility's response to the emergency; N/A

VIOLATIONS

STATUS

X Violations

X Satisfactory
NA Not Applicable

- (8) ___ The emergency coordinator provided for treating, storing or disposing of recovered waste, contaminated soil or surface water, or any other material that resulted from a release, fire or explosion at the facility; N/A

- (9) ___ The emergency coordinator ensured that in the affected area no waste that may be incompatible with the released material was treated, stored or disposed of until cleanup procedures were completed; N/A

- (10) ___ The emergency coordinator ensured that all emergency equipment listed in the contingency plan was cleaned and fitted for its intended use before operations were resumed; N/A

- (11) ___ The owner or operator notified the Commissioner that the facility is in compliance with Part 373-3.4(g)(8) before operations were resumed in the affected areas of the facility; N/A

- (12) ___ The owner or operator noted in the operating record the time, date and details of the incident that required implementation of the contingency plan; N/A

- (13) ___ The owner or operator submitted a complete written report on the incident within 15 days after the incident occurred. N/A

Part VI

Interim Status Treatment, Storage and Disposal Facility (TSDF)

(This Part does not apply to permitted facilities. For permitted facilities, complete Appendix C.)

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

1. Required Notices - 373-3.2(c)

- A. The owner or operator of a facility that has arranged to receive hazardous waste from a foreign source has complied with section 372.5 of this Title - 373-3.2(c)(1). N/A
- B. Before transferring ownership or operation of a facility during its operating life, or of a disposal facility during the post-closure care period, the owner or operator notified the new owner or operator in writing of the requirements - 373-3.2(c)(2). N/A

2. General Waste Analysis - 373-3.2(d)

- A. Before treatment, storage, or disposal of any hazardous waste, the owner or operator obtained a detailed chemical and physical analysis of a representative sample of the waste. At a minimum, this analysis must contain all the information which must be known to treat, store, or dispose of the waste in accordance with the requirements of this Subpart and 6NYCRR Part 376 - 373-3.2(d)(1)(i). X
- B. The analysis included data developed under 6NYCRR Part 371 and existing published or documented data on the hazardous waste or on waste generated from similar processes - 373-3.2(d)(1)(ii). X
- C. The analysis has been repeated as necessary to ensure that it is accurate and up-to-date - 373-3.2(d)(1)(iii). X
- D. The owner or operator of an off-site facility must inspect and, if necessary, analyze each hazardous waste movement received at the facility to determine whether it matches the identity of the waste specified on the accompanying manifest or shipping paper - 373-3.2(d)(1)(iv). N/A
- E. The owner or operator has developed and followed a written waste analysis plan - 373-3.2(d)(2). Y
- F. The owner or operator keeps this plan at the facility - 373-3.2(d)(2). X

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

G. The plan specifies, at a minimum:

1. The parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters - 373-3.2(d)(2)(i). X
2. The test methods which will be used to test for these parameters - 373-3.2(d)(2)(ii). X
3. The sampling method which will be used to obtain a representative sample of the waste to be analyzed - 373-3.2(d)(2)(iii). X
4. The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date - 373-3.2(d)(2)(iv). X
5. For off-site facilities, the waste analyses that hazardous waste generators have agreed to supply - 373-3.2(d)(2)(v). N/A
6. Where applicable, the methods which will be used to meet the additional waste analysis requirements for specific waste management methods as specified in Part 373-3 and 376.1(g) - 373-3.2(d)(2)(vi). X
7. For surface impoundments exempted from land disposal restrictions under 376.1(d)(1), the procedures and schedule for:
 - (a) the sampling of impoundment contents 373-3.2(d)(2)(vii)(a). N/A
 - (b) the analysis of test data - 373-3.2(d)(2)(vii)(b). N/A
 - (c) the annual removal of residues which are not delisted and exhibit a characteristic of hazardous waste or which do not meet the treatment standards in 376.4 of this title - 373-3.2(d)(2)(vii)(c). N/A
8. For off-site facilities the waste analysis plan required must also specify the procedures which will be used to inspect and, if necessary, analyze each movement of hazardous waste received at the facility to ensure that it matches the identity of the waste designated on the accompanying N/A

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

manifest or shipping paper. The plan describes, at a minimum:

- (a) The procedures which will be used to determine the identity of each movement of waste managed at the facility - 373-3.2(d)(3)(i); and N/A
- (b) The sampling method which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling - 373-3.2(d)(3)(ii). N/A
- (c) The procedures that the owner or operator of an off-site landfill receiving containerized hazardous waste will use to determine whether a hazardous waste generator or treater has added a biodegradable sorbent to the waste in the container - 373-3.2(d)(3)(iii). N/A

3. Security - 373-3.2(e)

A. The owner or operator must prevent the unknowing entry, and minimize the possibility for the unauthorized entry, of persons or livestock onto the active portion of his facility, because:

- 1. physical contact with the waste, structures or equipment within the active portion of the facility will injure unknowing or unauthorized persons or livestock which may enter the active portion of a facility - 373-3.2(e)(1)(i) AND YES NO
- 2. disturbance of the waste or equipment, by the unknowing or unauthorized entry of persons or livestock onto the active portion of a facility, will cause a violation of the requirements - 373-3.2(e)(1)(ii). YES NO

B. If yes is checked under A1 and A2 above, the facility must have the following:

- 1. A 24-hour surveillance system which continuously monitors and controls entry onto the active portion of the facility - 373-3.2(e)(2)(i) OR X
- 2. An artificial or natural barrier which completely surrounds the active portion of the facility - 373-3.2(e)(2)(iii)(a); AND X

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

- 3. A means to control entry, at all times, through the gates or other entrances to the active portion of the facility - 373-3.2(e)(2)(i)(b). X
- 4. A sign with the legend, "Danger - Unauthorized Personnel Keep Out" posted at each entrance to the active portion of the facility, and at other locations, in sufficient numbers to be seen from any approach to the active portion (not needed if owner or operator is exempt under A1 and A2 above) - 373-3.2(e)(3). X

5. General Inspection Requirements - 373-3.2(f)

- A. The owner or operator has inspected the facility for malfunctions and deterioration, operator errors, and discharges which may be causing or may lead to release of hazardous waste constituents to the environment, or a threat to human health hazards - 373-3.2(f)(1). X
- B.
 - 1. The owner or operator has developed and followed a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment (such as dikes and sump pumps) that are important to preventing, detecting, or responding to environmental or human health hazards - 373-3.2(f)(2)(i). X
 - 2. The written inspection schedule is kept at the facility - 373-3.2(f)(2)(ii). X
 - 3. The schedule identifies the type of problems which are to be looked for during the inspection - 373-3.2(f)(2)(iii). X
 - 4. The frequency of inspection is based on the rate of possible deterioration of the equipment and the probability of an environmental or human health incident, if the deterioration, or malfunction, or any operator error goes undetected between inspections. Areas subject to spills, such as loading and unloading areas, must be inspected daily when in use. At a minimum, the inspection schedule must include the items and frequencies called for in other sections of Part 373 dealing with treatment, storage and disposal activities - 373-3.2(f)(2)(iv). X
- C. The owner or operator has remediated any deterioration or malfunction of equipment or structures which the inspection has revealed - 373-3.2(f)(3). X
- D. The owner or operator has recorded inspections in an inspection log or summary - 373 3.2(f)(4). X

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

- E. The inspection log or summary has been kept for at least three years from the date of inspection - 373-3.2(f)(4). X
- F. The records, at a minimum, include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or remedial actions - 373-3.2(f)(4). X
6. Container Storage Requirements - Complete Part V, Items 3(c) thru 3(j), (pgs. V-2 and V-3), as applicable.
7. Personnel Training - Complete Part V, Item 6 (pgs. V-7 and V-8).
8. Preparedness and Prevention - Complete Part V, Item 7 (pgs. V-8 through V-10).
9. Contingency Plan and Emergency Procedures - Complete Part V, Items 8 and 9 (pgs. V-10 through V-12).
10. Manifest, Recordkeeping and Reporting - Complete Part V, Item 5 (pgs. V-5 through V-7). NOTE: These questions apply only to TSD's that ship hazardous waste off-site.
11. Operating Record - 373-3.5(c)
- A. The owner or operator has kept a written operating record at his facility - 373-3.5(c)(1). X
- B. The following information is included in the operating record, as it becomes available, and maintained in the operating record until closure of the facility - 373-3.5(c)(2):
1. A description and the quantity of each hazardous waste received, and the method(s) and date(s) of its treatment, storage or disposal at the facility - 373-3.5(c)(2)(i): X
2. The location of each hazardous waste within the facility and the quantity at each location - 373-3.5(c)(2)(ii): X
3. (For disposal facilities). The location and quantity of each hazardous waste must be recorded on a map or diagram of each cell or disposal area - 373-3.5(c)(2)(ii): N/A
4. Information must include cross references to specific manifest document numbers, if the waste was accompanied by a manifest - 373-3.5(c)(2)(ii): N/A

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

- | | | |
|-----|--|------------|
| 5. | <input type="checkbox"/> Records and results of waste analyses and trial tests performed - 373-3.5(c)(2)(iii); | <u>X</u> |
| 6. | <input type="checkbox"/> Summary reports and details of all incidents that require implementing the contingency plan - 373-3.5(c)(2)(iv); | <u>N/A</u> |
| 7. | <input type="checkbox"/> Records and results of inspections as required by 373-3.2(f) - 373-3.5(c)(2)(v); | <u>X</u> |
| 8. | <input type="checkbox"/> Monitoring, testing or analytical data where required - 373-3.5(c)(2)(vi); | <u>X</u> |
| 9. | <input type="checkbox"/> All closure cost estimates. (Does not apply to generators over sole source aquifer and State or Federal facilities) - 373-3.5(c)(2)(vii); | <u>X</u> |
| 10. | <input type="checkbox"/> (For disposal facilities). All post-closure cost estimates - 373-3.5(c)(2)(vii); | <u>N/A</u> |
| 11. | <input type="checkbox"/> Records of the quantities (and date of placement) for each shipment of hazardous waste placed in land disposal units under an extension to the effective date of any land disposal restriction granted by the Commissioner - 373-3.5(c)(2)(viii); | <u>N/A</u> |
| 12. | <input type="checkbox"/> Monitoring data required pursuant to a petition; 373-3.5(c)(2)(viii); | <u>N/A</u> |
| 13. | <input type="checkbox"/> The applicable notice required by a generator under 376.1(g), [waste analysis and recordkeeping] - 373-3.5(c)(2)(viii); | <u>X</u> |
| 14. | <input type="checkbox"/> For an off-site treatment facility, a copy of the notice, and the certification and demonstration if applicable, required by the generator or the owner or operator under 376.1(g) - 373-3.5(c)(2)(ix); | <u>X</u> |
| 15. | <input type="checkbox"/> For an on-site treatment facility, the information contained in the notice (except the manifest number), and the certification and demonstration if applicable, required by the generator or the owner or operator under 376.1(g) - 373-3.5(c)(2)(x); | <u>X</u> |
| 16. | <input type="checkbox"/> For an off-site land disposal facility, a copy of the notice, and the certification and demonstration, if applicable, required by the generator or the owner or operator of a treatment facility under 376.1(g) - 373-3.5(c)(2)(xi); | <u>X</u> |

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

17. ___ For an on-site land disposal facility, the information contained in the notice (except the manifest number), and the certification and demonstration if applicable, required by the generator or the owner or operator of a treatment facility under 376.1(g) - 373-3.5(c)(2)(xii); N/A
18. ___ For an off-site storage facility, a copy of the notice and the certification and demonstration if applicable, required by the generator or the owner or operator under 376.1(g) - 373-3.5(c)(2)(xiii); and N/A
19. ___ For an on-site storage facility, the information contained in the notice (except the manifest number), and the certification and demonstration if applicable, required by the generator or the owner or operator of a treatment facility under 376.1(g) - 373-3.5(c)(2)(xiv). N/A

12. Manifest - 373-3.5(b) (NOTE: This section applies only to TSD operations that receive hazardous waste from off-site.)

- A. Upon receipt of manifested shipment of hazardous waste the owner or operator:
1. ___ checked for significant discrepancies in quantities from those stated on the manifest - 373-3.5(b)(1)(i)(a). N/A
2. ___ determined that all portions of the manifest have been completed - 373-3.5(b)(1)(i)(b). N/A
3. ___ distributed copies of the manifest according to the instructions with the manifest form - 373-3.5(b)(1)(iv). N/A
- B. Upon receipt of an unmanifested shipment of hazardous waste the owner or operator:
1. ___ determined the reason why the shipment was not accompanied by a manifest - 373-3.5(b)(2)(i). N/A
2. ___ filed an unmanifested waste report after accepting the waste transported by a rail or water transporter and manifest is not received within seven days of the shipment - 373-3.5(b)(2)(iii). N/A
- C. ___ Facility accepted a particular hazardous waste without an authorized permit to do so - 373-3.5(b)(5)(i). N/A
- D. ___ Facility accepted a hazardous waste without having adequate treatment, storage or disposal capacity available - 373-3.5(b)(5)(ii). N/A

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

13. Availability, Retention and Disposition of Records

- A. ___ All records, including plans, required under Part 373-3 are kept at the facility and furnished upon request, and made available at all reasonable times for inspection - 373-3.5(d)(1). X
- B. ___ All reports and records required under subdivision 373-3.5(b)(3) were retained for three years from the date of submittal - 373-3.5(b)(3)(iii)(a). X
- C. ___ Upon closure of the facility, a copy of records of waste disposal locations and quantities was submitted to the Commissioner and local Land Authority - 373-3.5(d)(3). N/A

14. Additional Reports

- A. ___ A TSDF Annual Report has been submitted to the Department by March 1 of each year - 373-3.5(e). X
- B. ___ Releases, fires and explosions as specified in paragraph 373-3.4(g)(10) - 373-3.5(g)(1). N/A
- C. ___ Groundwater contamination and monitoring data as specified in subdivisions 373-3.6(d) and 373-3.6(e) - 373-3.5(g)(2). N/A
- D. ___ Facility closure as specified in subdivision 373-3.7(f) - 373-3.5(g)(3). N/A

15. Groundwater Monitoring - 373-3.6

- ___ A groundwater monitoring program is required for surface impoundments, landfills, or land treatment facilities and has been implemented - 373-3.6(a)(1). N/A

GROUNDWATER MONITORING QUESTIONNAIRE

APPENDIX Q WILL BE COMPLETED BY GEOLOGIST

16. Closure and Post-Closure - 373-3.7

- A. ___ The owner or operator has a written closure plan. Until final closure is completed and certified, a copy of the most current plan must be furnished to the Commissioner upon request. In addition, for facilities without approved plans it must be provided during site inspections, on the day of inspection, to any authorized Department representative - 373-3.7(c)(1). X

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

- B. The owner or operator must amend the closure plan whenever changes in operating plans or facility design affect the closure plan, there is a change in the expected year of closure, or in conducting partial or final closure activities. unexpected events require a modification of the closure plan - 373-3.7(c)(3)(i). X
- C. The owner or operator of a hazardous waste disposal unit must have a written post-closure plan - 373-3.7(h)(1). N/A
- D. Within 60 days of completion of final closure of the facility or within 60 days of a partial closure of any hazardous waste management unit, the owner or operator has submitted to the Commissioner, by registered mail, a certification that the unit or facility, as applicable, has been closed in accordance with the specifications in the approved closure plan. The certification has been signed by the owner or operator and by an independent professional engineer registered in NYS - 373.3.7(f)(1). N/A

17. Financial Requirements - 373-3.8 (Generators over a sole source aquifer, and State and Federal Facilities are exempt).

- A. The owner or operator has a detailed written estimate of the cost of closing the facility. The estimate appears to equal the cost of closure at the point in the facility's operating life when the extent and manner of its operation would make closure the most expensive, as indicated by its closure plan. The closure cost are based on the costs of third party closure and do not incorporate any salvage values - 373-3.8(c)(1). N/A
- B. Within 60 days prior to the anniversary date of the establishment of the financial instruments used to provide financial assurance for facility closure, the owner or operator has adjusted the closure cost estimate for inflation. For owners and operators using the financial test or corporate guarantee, the closure cost estimate has been updated for inflation within 30 days after the close of the firm's fiscal year - 373-3.8(c)(2). N/A
- C. The closure cost estimate has subsequently been adjusted for each year of operation - 373-3.8(c)(2). N/A
- D. The owner or operator has revised the new closure cost estimate no later than 30 days after a revision to the closure plan affects the cost of closure - 373-3.8(c)(3). N/A
- E. The owner or operator has kept the first estimate, and all required subsequent estimates at the facility - 373-3.8(c)(4). N/A

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

F. ___ The owner or operator has established financial assurance for closure of the facility - 373-3.8(d). N/A

G. ___ The owner or operator of a facility or a group of facilities has demonstrated and maintained financial responsibility for bodily injury and property damage to third parties caused by sudden accidental occurrences arising from operations. This liability coverage is in the amount of at least \$1 million per occurrence with an annual aggregate of at least \$2 million - 373-3.8(h)(1). N/A

(QUESTIONS H THROUGH J ARE FOR OWNERS AND OPERATORS OF DISPOSAL FACILITIES)

H. ___ The owner or operator of a surface impoundment, landfill, or land treatment facility or a group of such facilities has demonstrated financial responsibility for bodily injury and property damage to third parties caused by nonsudden accidental occurrences arising from operations. This liability coverage is in the amount of at least \$4.5 million per occurrence with an annual aggregate of at least \$9 million for each separate facility in NYS - 373-3.8(h)(2). N/A

I. ___ The owner or operator of a hazardous waste disposal unit facility has a detailed written estimate of the annual costs of post-closure monitoring and maintenance of the facility - 373-3.8(e)(1). N/A

J. ___ During the active life of the facility, the owner or operator has adjusted the post-closure cost estimate within 60 days prior to the anniversary date of the establishment of the financial instruments used to provide financial assurance - 373-3.8(e)(2). N/A

18. Tanks - 373-3.10

Complete Appendix E.

Company Name SENECA ARMY DEPOT

EPA ID# No. N Y 0 2 1 3 8 2 0 8 3 0

Region/Inspector 8/MICHAEL KHALIL

Inspection Date 10/10/1996

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

APPENDIX M

Thermal Treatment

- A. Before adding hazardous waste, the owner or operator has brought his thermal treatment process to steady state (normal) conditions of operation - 373-3.16(b). N/A
- B. In addition to the waste analyses required by subdivision 373-3.2(d), the owner or operator has sufficiently analyzed any waste which he has not previously treated in his thermal process to:
- (1) Enable him to establish steady state (normal) or other appropriate (for a non-continuous process) operating conditions (including waste and auxiliary fuel feed) - 373-3.16(c). N/A
- (2) Determine the type of air contaminants which might be emitted - 373-3.16(c). N/A
- (3) Determine the heating value of the waste - 373-3.16(c)(1). N/A
- (4) Determine the halogen content and sulfur content in the waste - 373-3.16(c)(2). N/A
- (5) Determine the concentrations in the waste of lead and mercury, unless the owner or operator has written documented data that show the element is not present - 373.16(c)(3). N/A
- C. The owner and operator has conducted, as a minimum, the following monitoring and inspections when thermally treating hazardous waste:
- (1) Existing instruments which relate to temperature and emission control must be monitored at least every 15 minutes - 373-3.16(d)(1)(i). N/A
- (2) Appropriate corrections to maintain steady state or other appropriate thermal treatment conditions are not made immediately, either automatically or by the operator - 373-3.16(d)(1)(i). N/A

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

- (3) ___ The stack plume (emissions), where present, is observed visually at least hourly for normal appearance (color and opacity) - 373-3.16(d)(1)(ii). N/A
- (4) ___ The operator must immediately make any indicated operating corrections necessary to return any visible emissions to their normal appearance - 373-3.16(d)(1)(ii). N/A
- (5) ___ The complete thermal treatment process and associated equipment (pumps, valves, conveyors, pipes, etc.) are inspected at least daily for leaks, spills and fugitive emissions, and system alarms must be checked to assure proper operation - 373-3.16(d)(1)(iii). N/A
- D. ___ At closure, the owner or operator has removed all hazardous waste and hazardous waste residues from the thermal treatment process or equipment - 373-3.16(e). N/A
- E. ___ Open burning of hazardous waste is prohibited except for the open burning and detonation of waste explosives - 373-3.16(f). X

Company Name SENECA ARMY DEPOT

EPA ID# No. N Y 0 2 1 3 8 2 0 8 3 0

Region/Inspector 8/M. KHALIL

Inspection Date OCTOBER 10, 1996

APPENDIX A
Land Disposal Restrictions

(For small quantity generators, generators and TSD's that are also generators)

I. Waste Identification

- A. List the hazardous wastes generated by the company.
(List by waste code)

D001 D002 D006 D005 D007 D040

U240 U165 U247 U411 U278 U279

P006 P108

F002

B005

II. Dilution Prohibited as a Substitute for Treatment

- | | YES | NO |
|---|-----------|--------------|
| A. Other than as described in B. below, has the generator, in any way diluted a restricted waste or the residual from treatment of a restricted waste: - 376.1(c)(1). | <u> </u> | <u> X </u> |
| 1. As a substitute for adequate treatment to achieve compliance with section 376.4. | <u> </u> | <u> X </u> |
| 2. To otherwise avoid a prohibition in section 376.3. | <u> </u> | <u> X </u> |

3. To circumvent a land disposal prohibition imposed by Article 27. X

If yes to 1, 2, or 3 above, identify the waste and provide a brief description of the dilution process.

YES NO

- B. Does the generator dilute characteristic hazardous wastes (in a treatment system which treats wastes subsequently discharged to NYS waters) pursuant to SPDES permit or for purposes of pretreatment under the Clean Water Act? [Dilution is permissible unless another method has been specified as the treatment standard in 376.4(c) (Five Letter Technology codes) or unless the waste is a D003 reactive cyanide wastewater or nonwastewater.] X

III. Waste Analysis and Recordkeeping - 376.1(g)

A. Determination of Wastes Restricted from Land Disposal.

1. Except as specified in 376.3(b), the generator has determined if his listed wastes are restricted from land disposal - 376.1(g)(1). X

The determination is based on:

- a. Testing of the wastes or extracts of the wastes using the test method described in Appendix 35 (TCLP), or X
- b. Using knowledge of the wastes X

2. Except as specified in 376.3(b), the generator has determined if his wastes exhibiting one or more characteristics (D001-D043) are restricted from land disposal - 376.1(g)(1). X

The determination is based on:

- a. Testing of extracts using the test method described in Appendix 20 (EP-tox), or X
- b. Using knowledge of the wastes. X

3. For ignitable D001 waste (that is not in the High TOC Ignitable Liquids Subcategory* or is not treated by INCIN, FSUBS or RORGS) or corrosive D002 waste that is X

prohibited under 376.3(e), the generator has determined what underlying hazardous constituents (as defined in 376.1(b)) are reasonably expected to be present in the D001 or D002 waste - 376.1(g)(1).

* High TOC Ignitable Liquids Subcategory - greater than or equal to 10% total organic carbon.

B. Restricted Wastes not Meeting Treatment Standards.

- For restricted wastes that do not meet the applicable treatment standards set forth in 376.4 or that exceed the prohibition levels in 376.3(b), the generator has notified the treatment or storage facility in writing. The notice must contain the following information: - 376.1(g)(1)(i). X
- 1. EPA Hazardous Waste Number - 376.1(g)(1)(i)(a). X
- 2. The corresponding treatment standards for wastes F001-F005, F039, wastes prohibited under 376.3(b), and for underlying hazardous constituents in D001 and D002 if these wastes are prohibited under 376.3(e). X
- 3. For all other restricted wastes not included in 2. above: X
 - a. The treatment standard. or X
 - b. A reference on the notification that, includes: X
 - (1) The applicable wastewater or nonwastewater category. X
 - (2) The applicable waste specific criteria within a waste code. X
 - (3) The section(s) and paragraph(s) where the applicable treatment standard appears. X
- 4. For treatment standards expressed as specified technologies, the applicable five-letter treatment code - 376.1(g)(1)(i)(b). X
- 5. The manifest number of the shipment - 376.1(g)(1)(i)(c). X
- 6. For hazardous debris, the contaminants subject to treatment as provided by 376.4(g)(2) and the following statement: "This hazardous debris is subject to the alternative treatment standards of 376.4(g)" - 376.1(g)(1)(i)(d). X
- 7. Waste analysis data, where available - 376.1(g)(1)(i)(e). X

C. Restricted Wastes Meeting Treatment Standards.

- ___ For restricted wastes that can be land disposed of without further treatment, the generator has submitted a notice and a certification to the treatment, storage, or disposal facility stating that the waste meets the applicable treatment standards and prohibition levels - 376.1(g)(1)(ii). N/A
1. ___ The notice includes the following information: N/A
- a. ___ EPA Hazardous Waste Number - 376.1(g)(1)(ii)(a)(1). N/A
- b. ___ For wastes F001-F005, F039, and wastes prohibited in 376.3(b), the corresponding treatment standards - 376.1(g)(1)(ii)(a)(2). N/A
- c. ___ For all other restricted wastes not included in b. above: - 376.1(g)(1)(ii)(a)(2). N/A
- (1) ___ The treatment standard, or N/A
- (2) ___ A reference on the notification that includes. N/A
- (a) ___ The applicable wastewater or nonwastewater category. N/A
- (b) ___ The applicable waste specific criteria within a waste code. N/A
- (c) ___ The section(s) and paragraph(s) where the applicable treatment standard appears. N/A
- d. ___ For treatment standards expressed as specified technologies, the applicable five-letter treatment code - 376.1(g)(1)(ii)(a)(2). N/A
- e. ___ The manifest number for the shipment - 376.1(g)(1)(ii)(a)(3). N/A
- f. ___ Waste analysis data where available - 376.1(g)(1)(ii)(a)(4). N/A
2. ___ The certification is signed by an authorized representative and makes the required statement - 376.1(g)(1)(ii)(b). N/A

D. Wastes Exempted from Land Disposal Prohibitions.

1. ___ For wastes exempted from land disposal prohibitions such as case-by-case extensions, exemptions under 376.1(f), or nationwide capacity variances, with each N/A

shipment the generator has submitted a notice to the facility receiving the waste stating that the waste is not prohibited from land disposal - 376.1(g)(1)(iii).

2. ___ The notice includes the following information. N/A
- a. ___ EPA Hazardous Waste number - 376.1(g)(1)(iii)(a). N/A
 - b. ___ For wastes F001-F005, F039, and wastes prohibited in 376.3(b), the corresponding treatment standards - 376.1(g)(1)(iii)(b). N/A
 - c. ___ For all other restricted wastes not included in b. above: - 376.1(g)(1)(iii)(b). N/A
 - (1) ___ The treatment standard, or N/A
 - (2) ___ A reference, including: N/A
 - (a) ___ The applicable wastewater or nonwastewater category. N/A
 - (b) ___ The applicable waste specific criteria within a waste code. N/A
 - (c) ___ The section(s) and paragraph(s) where the applicable treatment standard appears. N/A
 - (d) ___ For treatment standards expressed as specified technologies, the applicable five-letter treatment code - 376.1(g)(1)(iii)(b). N/A
 - d. ___ The manifest number of the shipment - 376.1(g)(1)(iii)(c). ___ N/A
 - e. ___ Waste analysis date, where available - 376.1(g)(1)(iii)(d). N/A
 - f. ___ For hazardous debris, the contaminants subject to treatment as provided by paragraph 376.4(g)(2) and the following statement: "This hazardous debris is subject to the alternative treatment standards of 376.4(g)" - 376.1(g)(1)(iii)(e). N/A
 - g. ___ The date the waste is subject to the prohibitions - 376.1(g)(1)(iii)(f). N/A

E. Treatment of Prohibited Wastes in Containers or Tanks.

- ___ For generators managing a prohibited waste in tanks, containers, or containment buildings, regulated under Part 373-1 and treating that waste in those tanks or N/A

containers to meet applicable treatment standards
the generator has:

1. Developed and followed written waste analysis plan which describes the procedures the generator will carry out to comply with the treatment standards - 376.1(g)(1)(iv). N/A
2. Kept the plan on-site in the generator's records - 376.1(g)(1)(iv). N/A
3. The following requirements have been met: N/A
 - a. The waste analysis plan has been based on a detailed chemical and physical analysis of a representative sample of the prohibited waste(s) being treated, and contains all information necessary to treat the waste(s), including the selected testing frequency - 376.1(g)(1)(iv)(a). N/A
 - b. The plan has been filed with the Commissioner to implement Part 376 requirements a minimum of 30 days prior to the treatment activity with delivery verified - 376.1(g)(1)(iv)(b). N/A
 - c. Wastes shipped off-site have complied with the notification requirements for restricted wastes meeting treatment standards - 376.1(g)(1)(iv)(c). [Complete Item III.C., pgs. A-4 and A-5.] N/A

F. Recordkeeping.

1. If a generator has determined whether a waste is restricted based solely on knowledge of the waste, all supporting data used to make this determination has been retained on-site in the generator's files - 376.1(g)(1)(v). X
2. If a generator has determined whether a waste is restricted based on testing of the waste or an extract developed using the test method described in Appendix 35 (TCLP), all waste analysis data has been retained on-site in the generator's files - 376.1(g)(1)(v). X
3. If a generator has determined that he is managing a restricted waste that is excluded from the definition of hazardous or solid waste, or exempt from regulation, under 371, subsequent to the point of generation, the generator has placed in the facility's file a one-time notice stating: - 376.1(g)(1)(vi). N/A
 - a. That the waste is generated. N/A

- b. That the waste is excluded from the definition of hazardous or solid waste or exempted from regulation, and N/A
- c. The disposition of the waste. N/A
- 4. Generators must retain on-site a copy of all notices, certifications, demonstrations, waste analysis data, and other documentation for at least five years from the date that the wastes were last sent to on-site or off-site treatment, storage, or disposal. This requirement applies to solid wastes even when the hazardous characteristic is removed prior to disposal, or when the waste is excluded from the definition of hazardous or solid waste, or exempted from regulation, subsequent to the point of generation - 376.1(g)(1)(vii). X

G. Alternate Treatment Standards for Lab Packs.

- 1. For generators managing lab packs containing wastes identified in Appendix 38 (organometallics), who wish to use the alternate treatment standards, with each shipment the generator has: - 376.1(g)(1)(viii). N/A
 - a. Submitted a notice to the treatment facility in accordance with 376.1(g)(1)(i). [Complete Item III.B., page A-3] N/A
 - b. Made a waste determination in compliance with 376.1(g)(1)(v) & (vi). [Complete Items III.F.1-3., pgs. A-6 through A-7.] N/A
 - c. Submitted the certification provided in 376.1(g)(1)(viii), signed by an authorized representative. N/A
- 2. For generators managing lab packs containing organic wastes specified in Appendix 39, who wish to use the alternate treatment standards, with each shipment the generator has: - 376.1(g)(1)(ix). N/A
 - a. Submitted a notice to the treatment facility in accordance with 376.1(g)(1)(i). [Complete Item III.B., page A-3] N/A
 - b. Made a waste determination in compliance with 376.1(g)(1)(v) & (vi). [Complete Items III.F.1-3., page A-6 through A-7.] N/A
 - c. Submitted the certification provided in 376.1(g)(1)(ix), signed by an authorized representative. N/A

H. Small Quantity Generators with Tolling Agreements.

- ___ For generators of less than 1,000 kg per calendar month: N/A
376.1(g)(1)(x)
1. ___ The waste is reclaimed under a contractual agreement - 372.2(b)(7)(i). N/A
 2. ___ For the initial shipment of such wastes, the generator has complied with the notification and certification requirements that apply for the wastes subject to the tolling agreement - 376.1(g)(1)(x). [Complete Items III.B, C, or D, pgs A-3 through A-5, as applicable, except for manifest requirements.] N/A
 3. ___ Small quantity generators must retain on-site a copy of the initial notification and certification, together with the tolling agreement, for at least three years after termination or expiration of the agreement - 376.1(g)(1)(x). N/A

I. Hazardous Debris.

- ___ Generators or treaters who first claim that hazardous debris is excluded from the definition of hazardous waste under paragraph 371.1(d)(5) of this Title, (i.e., debris treated by an extraction or destruction technology provided by Table 1, subdivision 376.4(g), and debris that the commissioner has determined does not contain hazardous waste) are subject to the following notification and certification requirements: 376.1(g)(4). N/A
1. ___ A one-time notification must be submitted to the commissioner to include the following information: 376.1(g)(4)(i). N/A
 - a. ___ The name and address of the authorized Part 360 facility receiving the treated debris - 376.1(g)(4)(i)(a). N/A
 - b. ___ A description of the hazardous debris as initially generated, including the applicable EPA or NYS Hazardous Waste Number(s) - 376.1(g)(4)(i)(b). N/A
 - c. ___ For debris excluded under subparagraph 371.1(d)(5)(i) of this Title, the technology from Table 1, subdivision 376.4(g), used to treat the debris - 376.1(g)(i)(c). N/A
 2. ___ The notification must be updated if the debris is shipped to a different facility, and, for debris excluded under subparagraph 371.1(d)(5)(i) of this Title, if a different type of debris is treated or if a different technology is used to treat the debris - 376.1(g)(4)(ii). N/A

IV. Special Rules Regarding Wastes That Exhibit a Characteristic

- A. The generator has determined each waste code applicable to the waste in order to determine the applicable treatment standard under section 376.4. For the purposes of Part 376, the waste must carry the code for a listed waste and also any characteristic code if the waste also exhibits that characteristic, except as specified below in Item B. If the generator determines that the waste displays the characteristic of ignitability (D001)(and is not in the High TOC Ignitable Liquids Subcategory or is not treated by INCIN, FSUBS, or RORGS of subdivision 376.4(c), Table 1), or the characteristic of corrosivity (D002), and is prohibited under subdivision 376.3(e) of this Part, the generator must determine what underlying hazardous constituents (as defined in subdivision 376.1(b) of this Part) - 376.1(h)(1). X
- B. For a prohibited waste that is listed and also exhibits a characteristic, the treatment standard for the listed waste code will operate in lieu of the standard for the characteristic code, provided the treatment standard for the listed waste includes a treatment standard for the constituent that causes the waste to exhibit the characteristic. Otherwise the waste must meet the treatment standards for all applicable listed and characteristic codes - 376.1(h)(2). X
- C. Prior to land disposal, all prohibited wastes which exhibit a characteristic have been treated to the treatment standards provided in 376.4 - 376.1(h)(3). N/A
- D. For characteristic hazardous wastes that have been treated and are no longer hazardous, the initial generator has shipped the wastes to a Part 360 facility and sent the notification and certification to the Commissioner* - 376.1(h)(4). N/A

* Notification is not required to be sent to the Part 360 facility.

1. The notification includes the following information: - 376.1(h)(4)(i). N/A
- a. The name and address of the Part 360 facility receiving the waste - 376.1(h)(4)(i)(a). N/A
- b. A description of the waste as initially generated, including the applicable EPA Hazardous Waste Number(s) and treatability group(s) - 376-1(h)(4)(i)(b). N/A
- c. The treatment standards applicable to the waste at the point of generation - 376.1(h)(4)(i)(c). N/A

2. The certification is signed by an authorized representative and includes the language found in 376.1(g)(2)(v) - 376.1(h)(4)(ii). N/A

V. Prohibitions on Land Disposal

A. Solvent/Dioxin Wastes. - 376.3(a)

1. Does the company generate any of the solvent wastes YES NO F001-F005 or any dioxin wastes F020-F023 and F026-F028 that are prohibited from land disposal?

(If yes, complete Item 2.)

2. These wastes may be land disposed provided that:
376.3(a)(1)
- a. The wastes meet the applicable treatment standards - 376.3(a)(1)(i). YES N/A NO
- b. The company has been granted an exemption from a prohibition pursuant to a petition under 376.1(f) with respect to those wastes covered by the petition - 376.3(a)(1)(ii). YES N/A NO
- c. The company has been granted an extension to the effective date of a prohibition - 376.3(a)(1)(iii). YES N/A NO

B. Prohibited Wastes - 376.3(b)(1).

1. Does the company generate any of the following wastes?
(If yes, answer Items 2 through 4 below.)
- a. Liquid hazardous wastes containing PCB's at concentrations of equal to or greater than 50 ppm - 376.3(b)(1)(i). YES NO
- b. Hazardous wastes containing halogenated organic compounds (HOCs) in concentrations greater than or equal to 1,000 ppm, that are identified as hazardous by a property that does not involve HOCs - 376.3(b)(1)(ii). YES NO
- c. Liquid hazardous wastes that contain over 134 mg/l nickel and/or 130 mg/l of thallium - 376.3(b)(1)(iii). YES NO
2. These wastes may be land disposed provided that:
376.3(b)(2).
- a. Persons have been granted an exemption from a prohibitions, or - 376.3(b)(2)(i). YES N/A NO

- b. Persons have been granted an extension to the effective date of a prohibition, or - 376.3(b)(2)(ii) YES N/A NO
- c. They meet the applicable treatment standards, or are in compliance with all prohibitions set forth in Part 376 or RCRA section 3004(d) - 376.3(b)(2)(iii). YES N/A NO
3. The wastes found in 1.(a)-(c) above have been subjected to the Paint Filter Liquids Test to determine if they are liquids - 376.3(b)(3). N/A
4. The initial generator of a liquid hazardous waste containing PCBs or a liquid or nonliquid hazardous waste containing HOCs has tested the waste (not an extract or filtrate) or used knowledge of the waste to determine if the waste equals or exceeds the specified prohibition levels (50 ppm for PCBs 1,000 ppm for HOCs) - 376.3(b)(4). N/A
- C. Prohibited Waste Found in 376.3(c) [First, Second, and Third Wastes].
1. The initial generator has tested a representative sample of the waste extract or the entire waste, depending on whether the treatment standards are expressed as concentration in the waste extract or the waste, or used knowledge of the waste to determine if it exceeds the applicable treatment standards - 376.3(c)(7). X
- D. Waste Specific Prohibitions - Ignitable and Corrosive Characteristic Wastes.
1. The wastes specified in 6 NYCRR 371.3(b) as D001 (and is in not the High TOC Ignitable Liquids Subcategory), and specified in 371.3(c) as D002, that are managed in systems other than those whose discharge is regulated under Titles 7 and 8 of Article 17 of the ECL, the Clean Water Act (CWA) (see subdivision 370.1(e)), or that inject in Class 1 deep wells regulated under the Safe Drinking Water Act (SDWA) (see subdivision 370.1(e)), or that are zero dischargers that engage in Title 7 and 8 or CWA-equivalent treatment before ultimate land disposal, are prohibited from land disposal. Title 7 and 8 and/or CWA-equivalent treatment means biological treatment for organics, alkaline chlorination of ferrous sulfate precipitation for cyanide, precipitation/sedimentation for metals, reduction of hexavalent chromium, or other technology that can be demonstrated to perform equally or greater than these technologies* - 376.3(d). X

* (Note: Deep well injection of hazardous waste is not allowed in New York State.).

E. Variance From a Treatment Standard. - 376.4(e)

1. Has the generator submitted a petition for a variance from a treatment standard where the treatment standard is expressed as a concentration in the waste or waste extract and the waste cannot be treated to the specified level, or where the treatment technology is not appropriate to the waste? YES NO

If yes, complete Items (a) and (b) below.

- (a) A generator that is managing a waste covered by a variance from a treatment standard has complied with the waste analysis requirements for a restricted waste - 376.4(e)(6). N/A

- (b) During the petition review process, the applicant has complied with all restrictions on land disposal - 376.4(e)(7). N/A

2. Has the generator submitted a petition for a site-specific variance from a treatment standard where the treatment standard is expressed as a concentration in the waste or waste extract and the waste which is generated under conditions specific only to one cannot be treated to the specified level, or the treatment technology is not appropriate to the waste? YES NO

If yes, complete Items (a) and (b) below.

- (a) The generator, treatment facility or disposal facility managing a waste covered by a site-specific variance from a treatment standard has complied with the waste analysis requirements for a restricted waste - 376.4(e)(11). N/A

- (b) During the application review process, the applicant has complied with all restrictions on land disposal - 376.4(e)(12). N/A

IX. Prohibition on Storage of Restricted Wastes* - 376.5(a)

- A. The storage of hazardous wastes restricted from land disposal is permitted provided that: - 376.5(a)(1). X

1. The small quantity generator has: N/A

- a. Stored restricted waste in tanks or containers on-site solely for the purpose of the accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment, or disposal - 376.5(a)(1)(i). N/A

- b. Complied with all storage requirements of 372, 373-1, and 373-3 - 376.5(a)(1)(i). N/A
- c. Stored all restricted wastes for 180/270 days or less - 376.5(a)(1)(i). N/A
2. The generator has:
- a. Stored restricted waste in tanks or containers on-site solely for the purpose of the accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment, or disposal - 376.5(a)(1)(i). X
- b. Complied with all storage requirements of 372, 373-1, 373-2, and 373-3 - 376.5(a)(1)(i). X
- c. Stored all restricted wastes for 90 days or less - 376.5(a)(1)(i). X

Company Name SFNECA ARMY DEPOT

EPA ID# No. N Y 0 2 1 3 8 2 0 8 3 0

Region/Inspector 8/M. KHALIL

Inspection Date OCTOBER 10, 1996

APPENDIX B
Land Disposal Restrictions

(For treatment, storage, and/or disposal facilities)

I. Waste Identification

- A. List the hazardous wastes treated, stored and/or disposed of by the company by waste code.

SEE APPENDIX A

II. Dilution Prohibited as a Substitute for Treatment - 376.1(c) YES NO

- A. Other than as described in B. below, has the TSD, in any way diluted a restricted waste or the residual from treatment of a restricted wastes: - 376.1(c)(1). X
1. As a substitute for adequate treatment to achieve compliance with section 376.4. X
2. To otherwise avoid a prohibition in section 376.3. X

3. To circumvent a land disposal prohibition imposed by Article 27. ___ X

If yes to 1, 2, or 3 above, identify the waste and provide a brief description of the dilution process.

YES NO

- B. Does the TSD dilute characteristic hazardous wastes (in a treatment system which treats wastes subsequently discharged to NYS waters) pursuant to SPDES permit or for purposes of pretreatment under the Clean Water Act? ___ X
 [Dilution is permissible unless another method has been specified as the treatment standard in 376.4(c) (Five Letter Technology Codes) or unless the waste is a D003 reactive cyanide wastewater or nonwastewater.]

III. Surface Impoundment Treatment - 376.1(d) YES NO

- Does the owner or operator treat* wastes which are prohibited from land disposal in a surface impoundment or series of surface impoundments? - 376.1(d)(1). ___ X

* The evaporation of hazardous constituents as the principal means of treatment in surface impoundment is not considered to be treatment for the purposes of this exemption.

Describe the waste(s) treated.

- A. ___ Treatment of the prohibited wastes occurs in the impoundments - 376.1(d)(1)(i). N/A
- B. ___ The following conditions have been met: N/A
- 376.1(d)(1)(ii).
1. ___ The residues from treatment are analyzed to determine if they meet the applicable treatment standards or prohibition levels - 376.1(d)(1)(ii)(a). N/A
2. ___ The sampling method, specified in the waste analysis plan, is designed so that representative samples of the sludge and supernatant are tested separately - 376.1(d)(1)(ii)(a). N/A
3. ___ The following treatment residues (including any liquid) are removed at least annually * - 376.1(d)(1)(ii)(b). N/A

X Violations

X Satisfactory
NA Not Applicable

- (a) Residues which do not meet the treatment standards promulgated under 376.4. N/A
- (b) Residues which meet or exceed the prohibition levels established under 376.3 or imposed by statute. N/A
- (c) Residues which are from the treatment of wastes prohibited from land disposal under 376.3. N/A
- (d) Residues from managing listed wastes which are not delisted under 370.3(c). N/A

* If the volume of liquid flowing through the impoundment or series of impoundments annually is greater than the volume of the impoundment or impoundments, this flow through constitutes removal of the supernatant.

- 1. Treatment residues have not been placed in any other surface impoundment for subsequent management after original placement - 376.1(d)(1)(ii)(c). N/A
- 2. The procedures and schedule for the sampling of impoundment contents, the analysis of test data, and the annual removal of land disposal restricted residues has been specified in the facility's waste analysis plan - 376.1(d)(1)(ii)(d). N/A
- 3. Unless exempted or granted a waiver, the impoundment meets the design requirements of 373-2.11(b)(3), 373-3.11(i)(1) and is in compliance with applicable groundwater monitoring requirements - 376.1(d)(1)(iii). N/A
- 4. The owner or operator has sent a written certification and a copy of the waste analysis plan to the Commissioner - 376.1(d)(1)(iv). N/A

IV. Case-by-Case Extensions - 376.1(e) YES NO

Does the owner or operator treat, store and/or dispose of any wastes subject to a a case-by-case extension to an effective date? - 376.1(e) X

Identify the waste(s) subject to extension.

X Violations

X Satisfactory
NA Not Applicable

V. Petitions to Allow Land Disposal - 376.1(f) YES NO

Has the owner or operator applied for or been granted an exemption from a prohibition of the land disposal of a restricted hazardous waste in a particular unit(s) by the Commissioner? - 376.1(f) YES NO

Identify the wastes subject to exemption.

VI. Waste Analysis and Recordkeeping - 376.1(g)

- A. The treatment facility has tested its waste in accordance with the frequency determined by the Commissioner and based on the criteria included in 373-2.2(e) or 373-3.2(d) - 376.1(g)(2). X
- B. The treatment facility has specified the frequency of testing in its waste analysis plan - 376.1(g)(2). X
- C. The treatment facility has performed the testing as follows: X
 - 1. For wastes with treatment standards expressed as concentrations in the waste extract (376.4(b)), the owner or operator has tested the treatment residues, or an extract of such residues developed using the test method described in Appendix 35 (TCLP), to assure that they meet the applicable treatment standards - 376.1(g)(2)(i). X
 - 2. For wastes that are prohibited (376.3(b)), but not subject to any treatment standards under 376.4, the owner or operator has tested the treatment residues according to generator testing requirements specified in 376.3(b), to assure that the treatment residues comply with the applicable prohibitions - 376.1(g)(2)(ii). X
 - 3. For wastes with treatment standards expressed as concentrations in the waste (376.4(d)), the owner or operator has tested the treatment residues (not an extract) to assure that the treatment residues meet the applicable treatment standards - 376.1(g)(2)(iii). X
 - 4. The treatment facility has sent a notice with each waste shipment to the land disposal facility - 376.1(g)(2)(iv). N/A

- 5. ___ The notice contains the following information: - 376.1(g)(2)(iv). N/A
 - a. ___ EPA Hazardous Waste Number - 376.1(g)(2)(iv)(a). N/A
 - b. ___ For wastes F001-F005, F039, and wastes prohibited in 376.3(b), the corresponding treatment standards - 376.1(g)(2)(iv)(b). N/A
 - c. ___ For all other restricted wastes not included in (b) above: N/A
 - (1) ___ The treatment standard or N/A
 - (2) ___ A reference on the notification, including: N/A
 - (a) ___ The applicable wastewater or nonwastewater category. N/A
 - (b) ___ The applicable waste specific criteria within a waste code. N/A
 - (c) ___ The section(s) and paragraph(s) where the applicable treatment standard appears. N/A
 - d. ___ For treatment standards expressed as specified technologies, the applicable five-letter treatment code - 376.1(g)(2)(iv)(b). N/A
 - e. ___ The manifest number of the shipment - 376.1(g)(2)(iv)(c). N/A
 - f. ___ Waste analysis data, where available - 376.1(g)(2)(iv)(d). N/A
- D. ___ The treatment facility has submitted a certification signed by an authorized representative, with each shipment of waste or treatment residue to the land disposal facility, stating that the waste or treatment residue has been treated in compliance with the applicable performance standards (376.4) and the applicable prohibitions (376.3(b)) - 376.1(g)(2)(v). N/A
 - 1. ___ For wastes with treatment standards expressed as concentrations in the waste extract or in the waste (376.4(b) or 376.4(d)), or for wastes prohibited under 376.3(b), which are not subject to any treatment standards under 376.4, the certification contains the statement required in 376.1(g)(2)(v)(a). N/A

X Violations

X Satisfactory
NA Not Applicable

2. For wastes with treatment standards expressed as technologies (376.4(c)), the certification contains the statement required in 376.1(g)(2)(v)(b). N/A
3. For wastes with treatment standards expressed as concentrations in the waste (376.4(d)), if compliance with treatment standards is based on non-detectability of organic constituents referred to in 376.4(d)(3), the certification also contains the statement required in 376.1(g)(2)(v)(c). N/A

VII. Restricted Wastes Shipped from one TSD to Another - 376.1(g)(2)(vi)

- A. If the waste or treatment residue will be further managed at a different treatment or storage facility, the treatment, storage or disposal facility sending the waste or treatment residue off-site has complied with the notice and certification requirements that apply to generators - 376.1(g)(2)(vi). N/A

B. **Restricted Wastes not Meeting Treatment Standards.**

- For restricted wastes that do not meet the applicable treatment standards set forth in 376.4 or that exceed the prohibition levels in 376.3(b), the generator has notified the treatment or storage facility in writing. The notice must contain the following information: - 376.1(g)(1)(i). X
1. EPA Hazardous Waste Number - 376.1(g)(1)(i)(a). X
2. The corresponding treatment standards for wastes F001-F005, F039, wastes prohibited under 376.3(b), and for underlying hazardous constituents in D001 and D002 if these wastes are prohibited under 376.3(e). X
3. For all other restricted wastes not included in 2. above: X
- a. The treatment standard, or X
- b. A reference on the notification, including: X
- (1) The applicable wastewater or nonwastewater category. X
- (2) The applicable waste specific criteria within a waste code. X
- (3) The section(s) and paragraph(s) where the applicable treatment standard appears. X

X Violations

X Satisfactory
 NA Not Applicable

- 4. For treatment standards expressed as specified technologies, the applicable five-letter treatment code - 376.1(g)(1)(i)(b). X
- 5. The manifest number of the shipment - 376.1(g)(i)(c). X
- 6. For hazardous debris, the contaminants subject to treatment as provided by 376.4(g)(2) and the following statement: "This hazardous debris is subject to the alternative treatment standards of 376.4(g)" - 376.1(g)(1)(i)(d). X
- 7. Waste analysis data, where available - 376.1(g)(1)(i)(d). X
- C. For restricted wastes or treatment residues that meets the treatment standard the notice contains the following information: N/A
 - 1. EPA Hazardous Waste Number - 376.1(g)(1)(ii)(a)(1). N/A
 - 2. For wastes F001-F005, F039, and wastes prohibited in 376.3(b), the corresponding treatment standards - 376.1(g)(1)(ii)(a)(2). N/A
 - 3. For all other restricted wastes not included in 2. above: - 376.1(g)(1)(ii)(a)(2). N/A
 - a. The treatment standard, or N/A
 - b. A reference on the notification that includes: N/A
 - (1) The applicable wastewater nonwastewater category. N/A
 - (2) The applicable waste specific criteria within a waste code. N/A
 - (3) The section(s) and paragraph(s) where the applicable treatment standard appears. N/A
 - 4. For treatment standards expressed as specified technologies, the applicable five-letter treatment code - 376.1(g)(1)(ii)(a)(2). N/A
 - 5. The manifest number for the shipment - 376.1(g)(1)(ii)(a)(3). N/A
 - 6. Waste analysis data where available 376.1(g)(1)(ii)(a)(4). N/A

X Violations

X Satisfactory
NA Not Applicable

7. ___ The certification is signed by an authorized representative and makes the required statement - 376.1(g)(1)(ii)(b). N/A

VIII. Recyclable Materials Used in a Manner Constituting Disposal - 376.1(g)(2)(vii). N/A

A. ___ With each shipment, where the wastes are recyclable materials used in a manner constituting disposal [374.3(a)(2)], the owner or operator of the recycling facility has submitted a certification and a notice to the Commissioner*. The notice must contain the following information: N/A

1. ___ EPA Hazardous Waste Number - 376.1(g)(1)(iv)(a). N/A

2. ___ For wastes F001-F005, F039, and wastes prohibited in 376.3(b), the corresponding treatment standards - 376.1(g)(2)(iv)(b). N/A

3. ___ For all other restricted wastes not included in 2. above: - 376.1(g)(2)(iv)(b). N/A

(a) ___ The treatment standard, or N/A

(b) ___ A reference including: N/A

(1) ___ The applicable wastewater or nonwastewater category. N/A

(2) ___ The applicable waste specific criteria within a waste code. N/A

(3) ___ The section(s) and paragraph(s) where the applicable treatment standard appears. N/A

(4) ___ For treatment standards expressed as specified technologies, the applicable five-letter treatment code - 376.1(g)(2)(iv)(b). N/A

4. ___ Waste analysis date, where available - 376.1(g)(2)(iv)(d). N/A

* The owner or operator of the treatment facility (i.e., the recycler) is not required to notify the receiving facility.

B. ___ The certification must contain the statement found in subparagraph 376.1(g)(2)(v) - 376.1(g)(2)(vii). N/A

X Violations

X Satisfactory
NA Not Applicable

- C. ___ The owner or operator of the treatment facility (i.e., the recycler) has kept records of the name and location of each entity receiving the hazardous waste-derived product - 376.1(g)(2)(vii). N/A

IX. Requirements for Land Disposal Facilities - 376.1(g)(3).

- ___ Except for the disposal of any waste that is a recyclable material used in a manner constituting disposal (374-1.3(a)(2)), the owner or operator of any land disposal facility disposing of any restricted wastes has: - 376.1(g)(3). N/A
- A. ___ Copies of the required notices and certifications - 376.1(g)(3)(i). N/A
- B. ___ Tested the waste, or an extract of the waste or treatment residue developed using the test method described in Appendix 35 (TCLP), or using any methods required by generators under 376.3(b), to assure that applicable treatment standards (376.4) and all applicable prohibitions (376.3(b)) are complied with - 376.1(g)(3)(ii). N/A
- C. ___ Specified the frequency of testing in its waste analysis plan - 376.1(g)(3)(iii). N/A
- D. ___ Tested its waste in accordance with the frequency determined by the Commissioner and based on the criteria included in 373-2.2(e) or 373-3.2(d) - 376.1(g)(3)(ii). N/A

X. Special Rules Regarding Wastes that Exhibit a Characteristic - 376.1(h)

- A. ___ In addition to any applicable standards determined from the initial point of generation, prior to land disposal, all prohibited wastes which exhibit a characteristic have been treated to the treatment standards provided in 376.4 - 376.1(h)(3). N/A
- B. ___ For characteristic hazardous wastes that have been treated and are no longer hazardous, the initial generator has shipped the wastes to a Part 360 facility and sent the notification and certification to the Commissioner* - 376.1(h)(4). N/A

* Notification is not required to be sent to the Part 360 facility.

1. ___ The notification includes the following information: - 376.1(h)(4)(i). N/A
- a. ___ The name and address of the Part 360 facility receiving the waste - 376.1(h)(4)(i)(a). N/A

X Violations

X Satisfactory
NA Not Applicable

- b. A description of the waste as initially generated, including the applicable EPA Hazardous Waste Number(s), and treatability group(s) - 376.1(h)(4)(i)(b). N/A
- c. The treatment standards applicable to the waste at the initial point of generation - 376.1(h)(4)(i)(c). N/A
- 2. The certification is signed by an authorized representative and includes the language found in 376.1(g)(2)(v) - 376.1(h)(4)(ii). N/A

XI. Prohibitions on Land Disposal - 376.3

A. Solvent/Dioxin Wastes - 376.3(a)

- 1. Does the owner/operator land dispose any of the solvent wastes F001 - F005 or any dioxin wastes F020 - F023 and F026 - F028? YES NO
If yes, complete Item No. 2.
- 2. The wastes are landfilled because they meet one of the following conditions: 376.3(a)(1).
 - a. The wastes meet the applicable treatment standards - 376.3(a)(1)(i). N/A
 - b. The company has been granted an exemption from a prohibition pursuant to a petition under 376.1(f) with respect to those wastes covered by the petition - 376.3(a)(1)(ii). N/A
 - c. The company has been granted an extension to the effective date of a prohibition - 376.3(a)(1)(iii). N/A

B. Prohibited Wastes: California List Wastes - 376.3(b).

- 1. Does the company have any of the following wastes? (If yes, answer Items 2-3)
 - a. Liquid hazardous wastes containing PCB's at concentrations of equal to or greater than 50 ppm. YES NO
 - b. Hazardous wastes containing halogenated organic compounds (HOCs) in concentrations greater than or equal to 1,000 ppm, that are identified as hazardous by a property that does not involve HOCs. YES NO
 - c. Liquid hazardous wastes that contain over 134 mg/l nickel and/or 130 mg/l of thallium. YES NO

X Violations

X Satisfactory
NA Not Applicable

- 2. These wastes are land disposed because they meet one of the following conditions: - 376.3(b)(2).
 - a. Persons have been granted an exemption from a prohibition, or - 376.3(b)(2)(i). N/A
 - b. Persons have been granted an extension to the effective date of a prohibition, or - 376.3(b)(2)(ii). N/A
 - c. They meet the applicable treatment standards, or are in compliance with all prohibitions set forth in Part 376 or RCRA section 3004(d) - 376.3(b)(2)(iii). N/A
- 3. The wastes found in 1.(a)-(c) above have been subjected to the Paint Filter Liquids Test to determine if they are liquids - 376.3(b)(3). N/A

C. Ignitable and Corrosive Characteristic Wastes - 376.3(e)

- 1. The wastes specified in 6 NYCRR 371.3(b) as D001 (and is not in the High TOC Ignitable Liquids Subcategory), and specified in 371.3(c) as D002, that are managed in systems other than those whose discharge is regulated under Titles 7 and 8 of Article 17 of the ECL, the Clean Water Act (CWA) (see subdivision 370.1(e)), or that inject in Class 1 deep wells regulated under the Safe Drinking Water Act (SDWA) (see subdivision 370.1(e)), or that are zero dischargers that engage in Title 7 and 8 or CWA-equivalent treatment before ultimate land disposal, are prohibited from land disposal. Title 7 and 8 and/or CWA-equivalent treatment means biological treatment for organics, alkaline chlorination or ferrous sulfate precipitation for cyanide, precipitation/sedimentation for metals, reduction of hexavalent chromium, or other technology that can be demonstrated to perform equally or greater than these technologies - 376.3(e)(1). X

(Note: Deep well injection of hazardous waste is not allowed in New York State.)

Does the company treat any wastes that fall into the above category? YES NO

If yes list wastes and treatment method:

XII. Treatment Standards - 376.4A. Applicability of Treatment Standards - 376.4(a)

1. ___ A restricted waste identified in 376.4(b) [Table CCWE] may be land disposed only if an extract of the waste or the treatment residue does not exceed the value shown in Table CCWE for any hazardous constituent as determined by TCLP, with the following exceptions: D004, D008, K031, K084, K101, K012, P010, P011, P012, P036, P038 and U136 - 376.4(a)(1). N/A
2. ___ The individual wastes listed in 1. above may be land disposed only if an extract of the waste or the treatment residue as determined by TCLP or EP-Tox does not exceed the value shown in Table CCWE for any hazardous constituent - 376.4(a)(1)(i). N/A
3. ___ A restricted waste that has a specified treatment technology [376.4(c)(1)] or hazardous debris that has a specified technology [376.4(g)], may be land disposed only after treatment using that technology or an equivalent treatment method approved by the Commissioner. - 376.4(a)(2). N/A
4. ___ For waste displaying the characteristic of ignitability (D001) and reactivity (D003), that are diluted to meet the deactivation treatment standard in subdivision 376.4(c) Tables 1 and 2 (DEACT), the treater must comply with the precautionary measures specified in paragraphs 373-2.2(i)(2) and 373-3.2(h)(2) of this Title - 376.4(a)(2). N/A
5. ___ If a treatment standard has been established in subdivisions 376.4(b), (c), or (d) for a hazardous waste that is itself hazardous debris, the waste is subject to those standards rather than the standards for hazardous debris under subdivision 376.4(b) - 376.4(a)(4). N/A
6. ___ A restricted waste identified in 376.4(d) [Table CCW] may be land disposed only if the constituent concentrations in the waste or treatment residue of the waste do not exceed the value shown in Table CCW - 376.4(a)(3). N/A

B. Treatment Standards Expressed as Concentrations in Waste Extract - 376.4(b)

1. ___ Table CCWE identifies the restricted wastes and the concentration of their associated constituents which may not be exceeded by the extract of a waste or waste treatment residual as determined by TCLP - 376.4(b)(1). N/A

X Violations

X Satisfactory
NA Not Applicable

2. ___ If wastes with differing treatment standards for a constituent of concern are combined for purposes of treatment, the treatment residue meets the lowest treatment standard for that constituent - 376.4(b)(2). N/A
3. ___ The treatment standards for the constituents in F001-F005 which are listed in Table CCWE only apply to wastes which contain one, two, or all three of these constituents. If the waste contains any of these three constituents along with any of the other 26 constituents found in F001-F005, then only the treatment standards in subdivision 376.4(d) Table CCW are required - 376.4(b)(3). N/A

C. Treatment Standards Expressed as Specified Technologies - 376.4(c).

1. ___ Any wastes identified in a-d below, Table 2* or Table 3** of 376.4(c) have been treated using the technology or technologies specified in a-d below or in Table 1*** - 376.4(c)(1). N/A

* Technology-Based Standards by RCRA Waste Code.

** Technology-Based Standards for Specific Radioactive Hazardous Mixed Waste.

*** Description of Technology-Based Standards and Five-Letter Technology Codes.

- a. ___ Liquid hazardous wastes containing PCBs greater than or equal to 50 ppm and less than 500 ppm have been incinerated in accordance with 40 CFR 761.70, or burned in high efficiency boilers in accordance with 40 CFR 761.60* - 376.4(c)(1)(i). N/A
- b. ___ Liquid hazardous waste containing PCBs greater than 500 ppm have been incinerated in accordance with 40 CFR 761.70* - 376.4(c)(1)(i). N/A

* Thermal treatment is also in compliance with all applicable NYS regulations.

- c. ___ Hazardous wastes containing halogenated organic compounds in concentrations greater than or equal to 1,000 mg/kg that are prohibited under 376.3(b)(1) have been incinerated* - 376.4(c)(2)(ii). N/A

* These treatment standards do not apply where the waste is subject to a treatment standard for a specific HOC (such as a hazardous waste chlorinated solvent for which a treatment standard is established).

- d. ___ A mixture of wastewater (the discharge of which is subject to regulation under ECL Article 17 or the Clean Water Act) and de minimis losses of materials from manufacturing, which meets the criteria of the D001 ignitable liquids containing greater than 10% organic constituents (TOC) subcategory, has been treated using the DEACT treatment standard - 376.4(c)(1)(iii). N/A

2. An alternative treatment method approved by the Commissioner has been used in lieu of a standard established in Parts 376.4(c)(1), (3) and (4) - 376.4(c)(2). N/A
- Specify the waste treated:
-
-
3. As an alternative to the otherwise applicable 376.4 treatment standards, lab packs have been land disposed provided the following requirements are met: - 376.4(c)(3). N/A
- a. Lab packs comply with the applicable provisions of 373-2.14(1) and 373-3.14(i) - 376.4(c)(3)(i). N/A
- b. All hazardous wastes contained in lab packs are specified in Appendix 38 or 39 of this title - 376.4(c)(3)(ii). N/A
- c. The lab packs are incinerated in accordance with the requirements of 373-2.15 and 373-3.15 - 376.4(c)(3)(iii). N/A
- d. Any incinerator residues from lab packs containing D004 - D008, D010 and D011 are treated in compliance with the applicable treatment standards for such wastes - 376.4(c)(3)(iv). N/A
4. Radioactive hazardous mixed wastes with treatment standards specified in Table 3 of this subdivision are not subject to any treatment standards specified in subdivision 376.4(b), 376.4(d), or Table 2 of this subdivision. Radioactive hazardous mixed wastes not subject to treatment standards in Table 3 of this subdivision remain subject to all applicable treatment standards specified in subdivisions 376.4(b), 376.4(d), and Table 2 of this subdivision. Hazardous debris containing radioactive waste is not subject to the treatment standards specified in Table 3 of this subdivision, but is subject to the treatment standards specified in subdivision 376.4(g) - 376.4(c)(4) N/A

D. Treatment Standards Expressed as Waste Concentrations - 376.4(d)

1. Table CCW identified the restricted wastes and the concentrations of their associated constituents of concern which may not be exceeded by the waste or treatment residual (not an extract of either) for allowable land disposal - 376.4(d)(1). N/A
2. When wastes with differing treatment standards for a constituent of concern have been combined for treatment, the treatment residue meets the lowest treatment standard for that constituent - 376.4(d)(2). N/A
3. For organic constituents specified by footnote in Table CCW, the treatment and disposal facility has: - 376.4(d)(3). N/A
 - a. Certified compliance with the treatment standards, and N/A
 - b. Satisfactorily demonstrated the following conditions: N/A
 - (1) The treatment standards for the organic constituents were established based on incineration or based on combustion in fuel substitution units - 376.4(d)(3)(i). N/A
 - (2) The organic constituents have been treated using the methods specified in (1) above - 376.4(d)(3)(i). N/A
 - (3) The treatment or disposal facility has been unable to detect the organic constituents despite its best good-faith efforts as defined by applicable Department guidance or standards - 376.4(d)(3)(iii). N/A

E. Variance From a Treatment Standard - 376.4(e).

1. Each petition for a variance from a treatment standard has been submitted to the Commissioner in accordance with the procedures outlined in 6NYCRR Part 370.3(a) - 376.4(e)(2). N/A
2. Each petition includes the required certification - 376.4(e)(3). N/A
3. A generator, treatment facility or disposal facility that is managing a waste covered by a variance from a treatment standard has complied with the waste analysis requirements for a restricted waste - 376.4(e)(6). N/A

X Violations

X Satisfactory
NA Not Applicable

4. ___ During the petition review process, the applicant has complied with all restrictions on land disposal - 376.4(e)(7). N/A
5. ___ Applications for a site-specific variance must include the information in 6NYCRR Part 370.3(a)(2) - 376.4(e)(9). N/A
6. ___ The generator, treatment facility or disposal facility managing a waste covered by a site-specific variance from a treatment standard has complied with the waste analysis requirements for a restricted waste - 376.4(e)(11). N/A
7. ___ During the application review process, the applicant has complied with all restrictions on land disposal - 376.4(e)(12). N/A

F. PCB Disposal - 376.4(f).

1. ___ Except for waste B002, all PCB waste not regulated under 376.3(b) has been disposed of in accordance with 40 CFR 761 (TOSCA) - 376.4(f)(1). N/A
2. ___ Waste B002, from any source other than a spill, has not been stabilized or mixed with any substance in order to conform with 40 CFR 761 regarding land disposal - 376.4(f)(1)(i). N/A

XIV. Treatment Standards for Hazardous Debris - 376.4(g)

- A. ___ Hazardous debris has been treated, as follows, prior to land disposal, unless it has been determined that the debris is no longer contaminated with hazardous waste, or that the debris has been treated to the waste - specific treatment standard for the waste contaminating the debris: 376.4(g)(1). N/A
 1. ___ General. Hazardous debris must be treated for each "contaminant subject to treatment" defined in Item B, below using the technology or technologies identified in Table 1 - 376.4(g)(1)(i). N/A
 2. ___ Characteristic debris. Hazardous debris that exhibits the characteristic of ignitability, corrosivity, or reactivity, must be deactivated by treatment using one of the technologies identified in Table 1 - 376.4(g)(1)(ii). N/A
 3. ___ Mixtures of debris types. The treatment standards of Table 1 in this subdivision must be achieved for each type of debris contained in a mixture of debris types. If an immobilization technology is used in a

treatment train, it must be the last treatment technology used - 376.4(g)(1)(iii).

4. ___ Mixtures of contaminant types. Debris that is contaminated with two or more contaminants subject to treatment identified under Item B below must be treated for each contaminant using one or more applicable treatment technologies identified in Table 1 of this subdivision. If an immobilization technology is used in a treatment train, it must be the last treatment technology used - 376.4(g)(1)(iv). N/A
5. ___ PCBs. Hazardous debris that is also a hazardous PCB under Part 371 of this Title or a waste PCB under 40 CFR Part 761 (see subdivision 370.1(e)), is subject to the requirements of subdivision 376.4(f), 40 CFR Part 761 (see subdivision 370.1(e)), or the requirements of this subdivision, whichever are more stringent - 376.4(g)(1)(v). N/A
- B. ___ Hazardous debris must be treated for each "contaminant subject to treatment." The contaminants subject to treatment must be determined as follows: - 376.4(g)(1). N/A
1. ___ Toxicity characteristic debris. The contaminants subject to treatment for debris that exhibits the Toxicity Characteristic (TC) by subdivision 371.3(e) of this Title are those EP constituents for which the debris exhibits the TC toxicity characteristic - 376.4(g)(1)(i). N/A
2. ___ Debris contaminated with listed waste. The contaminants subject to treatment for debris that is contaminated with a prohibited listed hazardous waste are those constituents for which BDAT standards are established for the waste under subdivisions 376.4(b) and 376.4(d) - 376.4(g)(2)(ii). N/A
3. ___ Cyanide reactive debris. Hazardous debris that is reactive due to the presence of cyanide must be treated for cyanide - 376.4(g)(2)(iii). N/A
- C. ___ Hazardous debris which has been treated using one of the specified extraction or destruction technologies in Table 1 of this subdivision and which does not exhibit a characteristic of hazardous waste after treatment is not a hazardous waste and need not be managed in a Part 373 facility. Hazardous debris contaminated with a listed waste that is treated by an immobilization technology specified in Table 1 is a hazardous waste and must be managed in a Part 373 facility - 376.4(g)(3). treatment must be determined as follows: - 376.4(g)(1). N/A
- D. ___ Treatment residuals must meet the following general requirements except as provided in Items 3 and 5 below. - 376.4(g)(4)(i). N/A

X Violations

X Satisfactory
 NA Not Applicable

1. Residue from the treatment of hazardous debris must be separated from the treated debris using simple physical or mechanical means; and - 376.4(g)(4)(i)(a). N/A
2. Residue from the treatment of hazardous debris is subject to the waste-specific treatment standards provided by section 376.4 of this Part for the waste contaminating the debris - 376.4(g)(4)(i)9(b). N/A
3. Residue from the deactivation of ignitable, corrosive, or reactive characteristic hazardous debris (other than cyanide-reactive) that is not contaminated with a contaminant subject to treatment defined by paragraph (2) of this subdivision, must be deactivated prior to land disposal and is not subject to the waste-specific treatment standards of section 376.4 of this Part - 376.4(g)(4)(ii). N/A
4. Residue from the treatment of debris that is reactive due to the presence of cyanide must meet the standards for D003 under subdivision 376.4(d) - 376.4(g)(4)(iii). N/A
5. Ignitable nonwastewater residue containing equal to or greater than 10 percent total organic carbon is subject to the technology-based standards for D001: "Ignitable Liquids based on subdivision 371.3(b)" under subdivision 376.4(c) - 376.4(g)(4)(iv). N/A
6. Layers of debris removed by spalling are hazardous debris that remain subject to the treatment standards of this section - 376.4(g)(4)(v). N/A
 for cyanide - 376.4(g)(2)(iii).

XV. Prohibition on Storage of Restricted Wastes - 376.5(a)

- A. The storage of hazardous wastes restricted from land disposal is permitted provided that: - 376.5(a)(1). X
 1. The owner or operator of a hazardous waste treatment storage, or disposal facility has: X
 - a. Only stored restricted wastes in tanks or containers for up to one year solely for the purpose of the accumulation of such quantities as necessary to facilitate proper recovery, treatment, or disposal - 376.5(a)(1)(ii). X
 - b. Clearly marked each container or tank to identify its contents and the date each period of accumulation begins - 376.5(a)(1)(ii)(a). X

X Violations

X Satisfactory
NA Not Applicable

- c. Maintained in the operating record the contents and beginning accumulation date for each tank and container - 376.5(a)(1)(ii)(b). X
- d. Complied with all operating record requirements of 373-2.5(c) or 373-3.5(c) - 376.5(a)(1)(ii)(b). X
- 2. Liquid hazardous wastes containing PCBs at concentrations greater than or equal to 50 ppm have been stored at facilities that meet the requirements of 371 through 376 and 40 CFR 761.65(b), and have been removed from storage and treated or disposed of as required within one year of the date when such wastes were placed in storage - 376.5(a)(6). X
- B. Unless the Department can prove that such storage was not solely for the purpose of accumulation of such quantities as necessary to facilitate proper recovery, treatment or disposal, the owner/operator of a treatment, storage or disposal facility may store restricted waste for up to one year - 376.5(a)(2). X
- C. The owner/operator of a treatment, storage or disposal facility has stored restricted waste beyond one year and has proven that the storage was solely for the purpose of accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment, or disposal - 376.5(a)(3). X

WORKSHEET II
HAZARD ASSESSMENT
At Non-Department Owned Facilities

Facility Seneeca Army Depot
Controlling Employer Tom Grasek
Address Route 96
Contact Person Tom Grasek Phone _____

Personal Protective Equipment Needs Assessment:
(As required under 29 CFR 1910.132)

The information to complete this form may be collected over the phone from an identified contact person, may be extracted from the work place hazard assessment performed by the controlling employer, or in the case of facilities subject to OSHA standard 1910.120, may be extracted from the site health and safety plan. For facilities with no such information available, use Worksheet I.

I. Head Protection

Hard Hat yes___ no
If yes, type:

- ___ Type A (Impact and Penetration Resistance, plus low-voltage electrical insulation)
___ Type B (Impact and Penetration Resistance, plus high-voltage electrical insulation)
___ Type C (Impact and Penetration Resistance)

II. Eye Protection

Safety Glasses or Goggles yes no___

III. Hand Protection

Gloves yes__ no
If yes, type:

- Chemical Resistant
- Temperature Resistant
- Abrasion Resistant
- Other (Explain)

IV. Foot Protection

Safety Shoes yes no
If yes, Type(s):

- Toe Protection
- Metatarsal Protection
- Puncture Resistance
- Electrical Insulation

V. Additional Personal Protective Equipment Needs:

Hearing Protection yes__ no__

Respirator yes__ no__
If yes, Cartridge Type _____

Other Identified Safety and/or Health Hazards:

HAZARD

RECOMMENDED PROTECTION

Prepared By: _____ Date: _____

Attachment 1

BUILDING 307 INVENTORY LIST

DATE: 9 Oct 96

1. Waste paint, aerosol, EPA # D001. Container # 1. Total 1.
2. Nickel cadmium batteries, EPA # D006, Container # 6. Total 1.
3. Lead contaminated debris, solid, EPA # D008. Container # 18. Total 1.
4. PCB contaminated oil and debris, NYS # B002 and B007, containers # 17, 19, 20, and 26. Total 4.
5. Waste Paint EPA D001, Containers # 24, 25, and 30. Total 3.
6. Titanium Tetrachloride, EPA # D002, Container 35. Total 1.
7. M17 filter elements, EPA # D007, Container # 2. Total 1.
8. Calcium Hypochlorite, EPA # D003, Container # 3. Total 1.

INDUSTRIAL WASTE STORED IN BUILDING 307

1. Transmission oil spill debris, Containers # 34. Total 1.

40'-0"

13'-4"

13'-4"

10'

10'

50'



2 - SKID MOUNTED
4 - WHEEL MOUNTED
HAZAR BAIL
FIRE SUPPRESSION SYSTEMS
4 - HAZAR
FIRE EXTINGUISHER



1 55-gal. open head metal container

curtain work
1/2 cur. yd.



1 55-gal. open head metal container



55-gal. P. Plastic container



skid drum
lead drum
non-pac



Open head 55-gal metal drum

55-gal. open head metal drum

55-gal. metal open head drum



Attachment 2

UNITED STATES MILITARY-SENECA ARMY DEPOT

DATE	QUAN TITY	UNITS	WASTE CODE	CON TAIN ERS	TYPE	TSDF	TSDF ID NO.	DISP. METH.	NAME OF TRANSPORTER	TRANS PERMIT
951002	8	P	D002	1	DM	NORTHEAST ENVIRONMENTAL SERVICES	NYD057770109	R	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
951002	5521	P	D002	29	DM	NORTHEAST ENVIRONMENTAL SERVICES	NYD057770109	L	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
951002	464	P	D002	1	CW	NORTHEAST ENVIRONMENTAL SERVICES	NYD057770109	T	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
951002	550	P	D006	6	DM	NORTHEAST ENVIRONMENTAL SERVICES	NYD057770109	L	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
951002	2219	P	D001	7	DM	NORTHEAST ENVIRONMENTAL SERVICES	NYD057770109	B	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
951002	2334	P	D006	6	DM	NORTHEAST ENVIRONMENTAL SERVICES	NYD057770109	B	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
951002	4314	P	F002	13	DM	NORTHEAST ENVIRONMENTAL SERVICES	NYD057770109	B	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
951002	340	P	D005	1	DM	NORTHEAST ENVIRONMENTAL SERVICES	NYD057770109	L	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
951006	207	P	D001	1	DM	ENVIRONMENTAL SERV OF AMER INC	IND980590947	B	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
951006	28	P	F002	1	DM	NORTHEAST ENVIRONMENTAL SERVICES	NYD057770109	B	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
951006	6	P	D001	1	DF	NORTHEAST ENVIRONMENTAL SERVICES	NYD057770109	B	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
951006	467	P	D001	2	DM	NORTHEAST ENVIRONMENTAL SERVICES	NYD057770109	B	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
951006	183	P	D001	1	DM	NORTHEAST ENVIRONMENTAL SERVICES	NYD057770109	B	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
951006	216	P	D001	1	DM	NORTHEAST ENVIRONMENTAL SERVICES	NYD057770109	B	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
951006	140	P	D007	1	DM	NORTHEAST ENVIRONMENTAL SERVICES	NYD057770109	B	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
951006	18	P	P108	1	DM	NORTHEAST ENVIRONMENTAL SERVICES	NYD057770109	B	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
951006	703	P	D002	4	DM	NORTHEAST ENVIRONMENTAL SERVICES	NYD057770109	L	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
951006	4896	P	U240	3	DF	NORTHEAST ENVIRONMENTAL SERVICES	NYD057770109	B	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
951006	1	P	D002	1	DF	NORTHEAST ENVIRONMENTAL SERVICES	NYD057770109	L	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
951006	169	G	D001	11	DM	SAFETY-KLEEN CORP.	NYD980753784	R	SAFETY-KLEEN CORP	IL027
951011	4	G	D001	1	DF	SAFETY-KLEEN CORP.	NYD980753784	R	SAFETY-KLEEN CORP	IL027
951011	100	G	D001	6	DM	SAFETY-KLEEN CORP.	NYD980753784	R	SAFETY-KLEEN CORP	IL027
951120	85	P	D002	1	DM	NORTHEAST ENVIRONMENTAL SERVICES	NYD057770109	B	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
951120	60	P	D007	1	DF	NORTHEAST ENVIRONMENTAL SERVICES	NYD057770109	T	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
951120	80	P	D002	1	DF	NORTHEAST ENVIRONMENTAL SERVICES	NYD057770109	B	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
951120	10	P	D001	1	DF	NORTHEAST ENVIRONMENTAL SERVICES	NYD057770109	T	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
951129	299	G	D001	18	DM	SAFETY-KLEEN CORP.	NYD980753784	R	SAFETY-KLEEN CORP	IL027
951129	4	G	D001	1	DF	SAFETY-KLEEN CORP.	NYD980753784	R	SAFETY-KLEEN CORP	IL027
951213	26	K	D005	1	DM	PPM INC d/b/a USPCI	OH0986975399	B	QART TRUCKING INC	OH047
960111	5046	P	D002	10	DM	NORTHEAST ENVIRONMENTAL SERVICES	NYD057770109	R	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
960117	197	G	D001	13	DM	SAFETY-KLEEN CORP.	NYD980753784	R	SAFETY-KLEEN CORP	IL027
960126	30	P	U279	1	DF	ENSCO INC	ARD069748192	B	TRI STATE MOTOR TRANSIT	MO001
960126	3	P	U278	1	DF	ENSCO INC	ARD069748192	B	TRI STATE MOTOR TRANSIT	MO001
960126	3	P	U411	1	DF	ENSCO INC	ARD069748192	B	TRI STATE MOTOR TRANSIT	MO001
960131	43	P	D001	1	DF	NORTHEAST ENVIRONMENTAL SERVICES	NYD057770109	B	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
960131	120	P	U247	1	DM	NORTHEAST ENVIRONMENTAL SERVICES	NYD057770109	B	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
960131	850	P	D001	3	DM	NORTHEAST ENVIRONMENTAL SERVICES	NYD057770109	B	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
960131	33	P	U226	1	DF	NORTHEAST ENVIRONMENTAL SERVICES	NYD057770109	B	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
960131	20	P	P108	1	DF	NORTHEAST ENVIRONMENTAL SERVICES	NYD057770109	B	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
960131	30	P	U165	1	DF	NORTHEAST ENVIRONMENTAL SERVICES	NYD057770109	B	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
960131	7	P	P006	1	DF	NORTHEAST ENVIRONMENTAL SERVICES	NYD057770109	B	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
960131	438	P	D001	2	DM	NORTHEAST ENVIRONMENTAL SERVICES	NYD057770109	B	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
960131	339	P	U240	1	DM	NORTHEAST ENVIRONMENTAL SERVICES	NYD057770109	B	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
960131	361	P	D001	1	DM	NORTHEAST ENVIRONMENTAL SERVICES	NYD057770109	B	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
960131	134	P	D001	1	DM	NORTHEAST ENVIRONMENTAL SERVICES	NYD057770109	B	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
960131	2	P	D001	1	DF	NORTHEAST ENVIRONMENTAL SERVICES	NYD057770109	B	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
960209	825	G	D040	15	DM	ENVIRONMENTAL WASTE RESOURCES INC	CTD072138969	T	ENVIRONMENTAL WASTE RESOURCES INC	CT010
960209	16000	P	D005	32	DM	ENVIRONMENTAL WASTE RESOURCES INC	CTD072138969	T	ENVIRONMENTAL WASTE RESOURCES INC	CT010

Enter (CR) to continue or Q to quit:

UNITED STATES MILITARY-SENECA ARMY DEPOT

DATE	QUAN TITY	UNITS	WASTE CODE	CON TAIN ERS	TYPE	TSDF	TSDF ID NO.	DISP. METH.	NAME OF TRANSPORTER	TRANS PERMIT
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960214	4	G	0001	1	DF	SAFETY-KLEEN CORP.	NYD980753784	R	SAFETY-KLEEN CORP.	11027
960214	33	G	0019	2	DM	SAFETY-KLEEN CORP.	NYD980753784	R	SAFETY-KLEEN CORP.	11027
960313	144	G	0001	9	DM	SAFETY-KLEEN CORP.	NYD980753784	R	SAFETY-KLEEN CORP.	11027
960318	81	P	0001	1	DM	NORTHEAST ENVIRONMENTAL SERVICES	NYD057770109	R	NORTHEAST ENVIRONMENTAL SERVICES, INC	7A215
960509	237	G	0001	15	DM	SAFETY-KLEEN CORP.	NYD980753784	R	SAFETY-KLEEN CORP.	11027
960509	4	G	0001	1	DF	SAFETY-KLEEN CORP.	NYD980753784	R	SAFETY-KLEEN CORP.	11027
960509	47	G	0008	3	DM	SAFETY-KLEEN CORP.	NYD980753784	R	SAFETY-KLEEN CORP.	11027
960710	123	G	0001	8	DM	SAFETY-KLEEN CORP.	NYD980753784	R	SAFETY-KLEEN CORP.	11027
960723	192	P	0001	1	DM	HERITAGE ENVIRONMENTAL SERVICES INC	IND093219012	B	HAZMAT ENVIRONMENTAL GROUP INC	9A278
960723	371	P	0001	1	DM	HERITAGE ENVIRONMENTAL SERVICES INC	IND093219012	B	HAZMAT ENVIRONMENTAL GROUP INC	9A278
960723	3	P	0009	1	DF	HERITAGE ENVIRONMENTAL SERVICES INC	IND093219012	L	HAZMAT ENVIRONMENTAL GROUP INC	9A278
960723	71	P	0002	1	DM	HERITAGE ENVIRONMENTAL SERVICES INC	IND093219012	T	HAZMAT ENVIRONMENTAL GROUP INC	9A278
960723	99	P	0002	1	DF	HERITAGE ENVIRONMENTAL SERVICES INC	IND093219012	T	HAZMAT ENVIRONMENTAL GROUP INC	9A278
960723	287	P	0006	1	DF	HERITAGE ENVIRONMENTAL SERVICES INC	IND093219012	L	HAZMAT ENVIRONMENTAL GROUP INC	9A278
960805	110	G	0001	7	DM	SAFETY-KLEEN CORP.	NYD980753784	R	SAFETY-KLEEN CORP.	11027