New York State Department of Environmental Conservation
6274 East Avon-Lima Road, Avon, NY 14414

Thomas C. Jorling
Commissioner

CERTIFIED MAIL RETURN RECEIPT REQUESTED

October 19, 1993

20 OCT REC'D

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

Dear Mr. Battaglia:

Re: **Hazardous Waste Compliance Inspection Date: September 23, 1993**
Location of Handler: Same as Above

EPA Identification Number: NY0213820830

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(a)(2) requires a person who generates a solid waste, to determine if that waste is a hazardous waste. You have not made this determination and, therefore, are in violation of 6NYCRR Part 372.2(a)(2).

6NYCRR Part 373-1.1(d)(1)(iii) requires a generator who accumulates any hazardous waste on-site for a period of 90 days or less, or in quantities less than 8,800 gallons in containers or 20,000 gallons in tanks, to meet the following requirements in order to not be subject to the regulations applicable to hazardous waste treatment, storage and disposal facilities (other than the storage of liquid hazardous wastes in the counties of Kings, Nassau, Queens and Suffolk):

- the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container.

- a label or sign stating "Hazardous Waste" must identify all areas, tanks, and containers used to accumulate hazardous waste. In addition, tanks and containers must be marked with other words to identify their contents.

- if the generator accumulates more than 1,000 kilograms of hazardous waste or 1 kilogram of acute hazardous waste, all hazardous wastes stored in areas not excluded from contributing to the above amounts must be transported off-site or reclaimed, treated, or disposed of on-site within 90 days of then placement in the storage areas.

You have not met the requirement(s) identified above and, therefore, are in violation of 6NYCRR Part 373-1.1(d)(1)(iii).

6NYCRR Part 373-3.9(b) requires that if a container holding hazardous waste is not in good condition, or begins to leak, the owner or operator must transfer the hazardous waste from this container to a container that is in good condition, or manage the waste in some other way that complies with the requirements of this Part. You have failed to meet this requirement and, therefore, are in violation of 6NYCRR part 373-3.9(b).

6NYCRR Part 373-3.2(g)(1),(2),(3) requires that facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this Subpart. In addition, the owner or operator must ensure that:

- facility personnel take part in an annual review of the initial training required.

You have not met the above requirement(s) and, therefore, are in violation of 6NYCRR Part 373-3.2(g)(1),(2),(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(s) and, therefore, are in violation of 6NYCRR Part 373-3.5(c).

6NYCRR Part 376.5(a)(1)(i) permits a generator to store restricted wastes provided the following condition is met:

stores all restricted for 90 days or less.

You have not met this requirement and, therefore, are in violation of 6NYCRR Part 376.5 (a)(1)(i).

6NYCRR Part 376.5(1)(1)(ii) permits the owner or operator of a hazardous waste treatment, storage or disposal facility to store restricted wastes in tanks or containers up to one year solely for the purpose of the accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment, or disposal. You have not met this requirement and, therefore, are in violation of 6NYCRR Part 376.5(a)(1)(ii).

Violations regarding waste reduction plans will be handled by our Albany office under separate cover.

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.
Regional Hazardous Substances Engineer
NYS Department of Environmental Conservation
Division of Hazardous Substances Regulation
6274 East Avon-Lima Road
Avon, NY 14414
(716)226-2466
Attention: Mr. Clifford Richmond, Inspector

New York State Department of Environmental Conservation
6274 East Avon-Lima Road, Avon, NY 14414

Thomas C. Jorling
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6274 East Avon-Lima Road
Avon, NY 14414
(716)226-2466
Attention: Mr. Clifford Richmond, Inspector

SDSTO-SEI-PE

19 NOV 1993

MEMORANDUM THRU CHIEF, INSTALLATION MANAGEMENT DIVISION

FOR SUPERVISORS OF HAZARDOUS WASTE GENERATION AREAS

SUBJECT: Responsibilities of supervisors of hazardous waste generators

1. References:

a. SEDA regulation 420-2, Hazardous Waste Management dated 19 May 1993.

b. New York State Dept. of Environmental Conservation Hazardous Waste Compliance Inspection Notice of Violation letter dated 19 October 1993.

2. This memorandum will serve as a official reminder that you are responsible to ensure that the policies stated in the above referenced regulation are carefully and completely observed, to include the proper labeling of hazardous waste containers. Failure to comply with any part of this regulation could result in disciplinary action being taken against you.

Stephen M Absolom

STEPHEN M. ABSOLOM
C, Public Works

29 Nov 93

Copies sent to PWB
IMB
SECURITY
CAB

Hand delivered 19 Nov 93
1400 hrs

SDSTO-SEI-FE

19 NOV 1993

MEMORANDUM FOR CHIEF, MISSIONS OPERATIONS DIVISION

SUBJECT: Responsibilities of the Manager of the Mixed Wastes Conforming Storage located in building 803.

1. References:

a. SEDA regulation 420-2, Hazardous Waste Management dated 19 May 1993.

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Stephen M Absolom

STEPHEN M. ABSOLOM
C, Public Works Center

Hand delivered 19 Nov 93
1700 hrs

SDSTO-SEI-PE

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SDSTO-SEI-PE

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C, Public Works

New York State Department of Environmental Conservation
6274 East Avon-Lima Road, Avon, NY 14414

Thomas C. Jorling
Commissioner

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Attention: Mr. Clifford Richmond, Inspector

2 DEC 1993

SDSTO-SEI-PE

MEMORANDUM FOR CHIEF, INSTALLATION MANAGEMENT DIVISION

SUBJECT: Hazardous Waste Supervisors and Handlers

1. References:

a. SEDA regulation 420-2, Hazardous Waste Management dated 19 May 1993.

2. IAW the referenced regulation section 5 (b) (5) request you provide to this office a list of all the personnel in your division who are required to supervise anyone who handles/generates hazardous waste. List shall include name and job title of those individuals.

3. IAW the referenced regulation section 5 (f) (4) request you provide to this office a list of all personnel in your division who are required to handle hazardous waste. List shall include name and job title of those individuals.

4. IAW the referenced regulation section 6 (m) (2) request you provide to this office documentation that all the hazardous waste handlers identified under paragraph 3 have had their annual review of hazardous waste handler training for 1993.

5. IAW the referenced regulation section 5 (b) (2) request you provide to this office a list of all operations which generate hazardous wastes. List shall include building #, area location and type of wastes being generated.

6. Those individuals identified under paragraph 3 who have not received their annual review training for 1993 shall be scheduled to receive such training within the next 10 working days.

7. Those supervisors identified under paragraph 2 who are in need of their annual review of hazardous waste handler training should be scheduled to attend the next SEDA Hazardous Waste Handling Review Workshop scheduled for 8 December 1993 in buildings 103 training room at 0800 hrs.

STEPHEN M. ABSOLOM
C, Public Works

Hand delivered 2Dec93
distributed to Public Works, Security + Community Act 2Dec93

SDSTO-SEI-PE

19 NOV 1993

MEMORANDUM THRU CHIEF, INSTALLATION MANAGEMENT DIVISION

FOR SUPERVISORS OF HAZARDOUS WASTE GENERATION AREAS

SUBJECT: Responsibilities of supervisors of hazardous waste generators

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C, Public Works

29 Nov 93

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Hand delivered 19 Nov 93
1400 hrs

SDSTO-SEI-FE

19 NOV 1993

MEMORANDUM FOR CHIEF, MISSIONS OPERATIONS DIVISION

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Hand delivered 19 Nov 93
1400 hrs

SDSTO-SEI-PE

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Stephen M Absolom

STEPHEN M. ABSOLOM
C, Public Works

ATT: [illegible]

Upstate Laboratories, Inc.
Analysis Results
Quote Number:
Client I.D.: SENECA ARMY DEPOT

APPROVAL: [illegible]
QC: [illegible]
Lab-I[illegible]-18170
Samples by: ULI

DRAFT

ID:27993069 Mat:Solid SPECIAL LAB CONTRACT OIL SWITCH 100393A 10/5/93 1230H G

PARAMETERS	RESULTS	DATE ANAL.	KEY	FILE#
Percent Solids	54%	10/07/93	41	WA0274
PCB (Aroclors) by EPA Method 8080				
Aroclor 1016		10/18/93	34	PA0073
Aroclor 1221		10/18/93	34	PA0073
Aroclor 1232		10/18/93	34	PA0073
Aroclor 1242		10/18/93	34	PA0073
Aroclor 1248		10/18/93	34	PA0073
Aroclor 1254		10/18/93	34	PA0073
Aroclor 1260		10/18/93	34	PA0073
Total PCB	<2mg/kg	10/18/93		PA0073

ID:27993070 Mat:Solid SPECIAL LAB CONTRACT MOTOR CONTROLLER 1003938 10/5/93 1235H G

PARAMETERS	RESULTS	DATE ANAL.	KEY	FILE#
Percent Solids	95%	10/07/93	41	WA0274
PCB (Aroclors) by EPA Method 8080				
Aroclor 1016		10/18/93	34	PA0073
Aroclor 1221		10/18/93	34	PA0073
Aroclor 1232		10/18/93	34	PA0073
Aroclor 1242		10/18/93	34	PA0073
Aroclor 1248		10/18/93	34	PA0073
Aroclor 1254		10/18/93	34	PA0073
Aroclor 1260		10/18/93	34	PA0073
Total PCB	<2mg/kg	10/18/93		PA0073

ID:27993071 Mat:Oil SPECIAL LAB CONTRACT TRANSFORMER 70036 10/5/93 1245H G

PARAMETERS	RESULTS	DATE ANAL.	KEY	FILE#
PCB (Aroclors) by EPA Method 8080				
Aroclor 1016		10/20/93	34	PA0076
Aroclor 1221		10/20/93	34	PA0076
Aroclor 1232		10/20/93	34	PA0076
Aroclor 1242		10/20/93	34	PA0076
Aroclor 1248		10/20/93	34	PA0076
Aroclor 1254		10/20/93	34	PA0076
Aroclor 1260		10/20/93	34	PA0076
Total PCB	<2mg/kg	10/20/93		PA0076

Tom - Rest of metals will be available tomorrow.

Post-it™ brand fax transmittal memo 7671 | # of pages ▸ 2

To Tom Grasek	From Millick
Co. Seneca Army Depot	Co. TTI-SYR
Dept. 11-4-93	Phone # 315-437-0253
Fax # 607-869-1367	Fax #

ENCLOSURE 1

DEFENSE LOGISTICS AGENCY
DEFENSE REUTILIZATION AND MARKETING SERVICE
926 TAYLOR STATION ROAD
BLACKLICK, OHIO 43004-9615

07 JUL RECD

DRMS-DEH (DEHO, D. Kantner/(DSN)850-4285/kal) 30 JUN 1993

SUBJECT: Dioxin Data Call

TO: Chiefs/Site Managers of DRMOs

1. Reference: DRMS-DEH letter to DRMOs dated 28 Jan 93, subject: Disposal of dioxin wastes.

2. The moment we have all been waiting for has finally arrived. An incinerator has been approved to dispose of dioxin contaminated wastes in a commercial operation. In order to put together a disposal contract for dioxin wastes (EPA Waste Codes F020-F023 and F026-F028), we need to get a handle on the total dioxin waste load we will have to deal with.

3. In the reference letter, we asked for information on dioxin wastes that the DRMOs had custody of or had accountability for. Enclosure 1 are the results of that data call. This is the information we now have on our dioxin waste load in DPS East.

4. We now need to obtain information on all possible dioxin contaminated wastes that will need to be disposed of by a DRMS disposal contract. We will use the information to write a disposal contract to dispose of the following categories of dioxin contaminated wastes:

a. Items for which the DRMO now has physical custody.

b. Items on accountable record that the DRMO now has received in-place at generator sites.

c. Items that were picked up as a result of the two recent transportation/storage contracts that are being stored at a commercial storage facility.

d. Items the generators have on-hand, but have not turned-in yet.

e. Items the generators anticipate generating over the next 30 months.

5. This is your chance to get rid of those items that have been such a problem for so long. We will assume that the information contained in enclosure 1 is still correct. If there are any changes to this information (lines a. through c. in paragraph 4), let us know. Specifically, check the "Amount/Container" column of enclosure 1. If you did not provide the weight of your dioxin wastes in the original data call, please provide that information now.

ENCLOSURE 2

6. Poll your generators to find out if they have or anticipate generating any items as described in lines d. and e. in paragraph 4. If they do, supply us with the information listed below:

a. Name of facility where dioxin is stored.

b. Address of facility.

c. POC and phone number.

d. Description of item (chemical/brand name/manufacturer/NSN/etc.).

e. EPA Waste Codes applicable.

f. Quantity (lbs/gals) and container (description/condition).

g. Storage location (where at the facility is it stored).

h. Any factor that makes removal timeframes critical, e.g. 90 day storage, etc.

i. An MSDS, HMIS printout or HW Profile Sheet (and supporting laboratory test results).

7. If you have any questions or need assistance, contact your DEHO environmental monitor. Please send your information to DRMS-DEHO, ATTN: Rosalie Brockway by FAX [(DSN)850-1138 or (614)692-1138] or letter by 17 Jul 93. Negative replies are required. Negative replies can be done by phone to Rosalie at (DSN)850-2275.

1 Encl

GREG CLIFFEL
Chief
Environmental Division

ENCLOSURE ONE

RESULTS OF 28 Jan 93 DATA-CALL

OPS-EAST - REPORTED DIOXIN-CONTAMINATED INVENTORY
Dioxins Received In-place or Physical Custody

DRMO /	Location	Item Description	Amount/ Container	Storage Accommodations
ANNISTON	none			
BENNING	none			
CHARLESTON	none			
CHERRY POINT	DRMO II Goldsboro, NC	PCP wood preservative	55 gl dr	Part B
COLUMBUS	DRMO, OH	PCP wood preservative	(36) 55 gl dr	former Part A, now 90 day
CRANE	none			
DEVENS	none			
HOMESTEAD	none			
JACKSONVILLE	none			
KNOX	DRMO II Campbell, KY	2,4,5 T & water	(2) 7 gl cn (1 full, 1 empty)	Part A
LAKEHURST	none			
MEADE	none			
NORFOLK	SDA 215, VA	PCP	(2) containers	Part A
	NAD, VA	PCP wood preservative	(5) 55 gl dr	Part A
	NWSY, VA	" " "	(10) 55 gl dr	Part A
PANAMA	none			
PATRICK	Andros Island	PCP wood preservative	55 gl dr	outside RCRA purview
PENSACOLA	none			
ROME	Seneca [redacted]	[redacted]	??	Part A
	DRMO Plattsburgh, NY	PCP	??	Part A
ROOSEVELT ROADS	*(one item - more information coming)*			
SPARTA	DRMO, WI	PCP	550 lb	Part B
WARNER-ROBINS	none			

9ea-1gl cn in 55gl dn 306 lbs → per lbs to L. Kartner 11Sep92

1-5gl cn (18lbs) per lbs to L Kartner 23Sep92

SENECA ARMY DEPOT ACTIVITY

BLDG 123

ROMULUS, N.Y.

14541

DIRECTORATE of ENGINEERING and HOUSING

DATE: 18 Nov 93 TIME: 0830 # of PAGES W/ COVER SHT: 10

TO: DIANA MICHAELS

OFFICE/CO.: DESCOM
ENVIR

FAX# 570-8264

FROM: TOM GRASER
SENECA ARMY DEPOT
FAX# (607) 869-1362
PHONE# (607) 869-1532

COMMENTS: This response will be hand delivered to AVON New York today

Tom Graser

SENECA ARMY DEPOT ACTIVITY

BLDG 123

ROMULUS, N.Y.

14541

DIRECTORATE of ENGINEERING and HOUSING

DATE: 12 Nov 93 TIME: 1430 # of PAGES W/ COVER SHT: 5

TO: DIANN MICHAELS

OFFICE/CO.: DESCOM ENVIR.

FAX# 570-8264

FROM: TOM GRASEK

SENECA ARMY DEPOT

FAX# (607) 869-1362

PHONE# (607) 869-1532

COMMENTS: COPY OF LETTER SEDA RECEIVED FROM OUR LATEST HAZARDOUS WASTE COMPLIANCE INSPECTION.

She called and we discussed the letter in detail, she thinks the state will defiantly fine us.

Do AXIS immediatly —

****
*** ACTIVITY REPORT ***
****

TRANSMISSION OK

TX/RX NO.	5874
CONNECTION TEL	85708264
CONNECTION ID	
START TIME	11/12 15:28
USAGE TIME	02'25
PAGES	5
RESULT	OK

****
*** ACTIVITY REPORT ***
****

TRANSMISSION OK

TX/RX NO.	5907
CONNECTION TEL	667178947005
CONNECTION ID	TOAD EVIR MGMT
START TIME	11/18 10:59
USAGE TIME	05'23
PAGES	10
RESULT	OK

SENECA ARMY DEPOT Activity

BLDG 123

ROMULUS, N.Y.

14541

DIRECTORATE of ENGINEERING and HOUSING

DATE: 18 Nov 93 TIME: 0835 # of PAGES W/ COVER SHT: 10

TO: Joe Maciejewski

OFFICE/CO.: Toby Hanna
Environment Off

FAX# 795 7005
717 894 7005

FROM: Tom Grasek
SENECA ARMY DEPOT
FAX# (607) 869-1362
PHONE# (607) 869-1532

COMMENTS: This response will be hand delivered to Avon New York today

Tom Grasek

****
*** ACTIVITY REPORT ***
****

TRANSMISSION OK

TX/RX NO.	5677
CONNECTION TEL	716 226 2466 335
CONNECTION ID	
START TIME	10/13 10:19
USAGE TIME	01'41
PAGES	3
RESULT	OK

****
*** ACTIVITY REPORT ***
****

TRANSMISSION OK

TX/RX NO.	5674
CONNECTION TEL	665184570629
CONNECTION ID	
START TIME	10/13 10:03
USAGE TIME	01'51
PAGES	3
RESULT	OK

SENECA ARMY DEPOT ACTIVITY

BLDG 123

ROMULUS, N.Y.

14541

DIRECTORATE of ENGINEERING and HOUSING

DATE: 13 OcT 93 TIME: 0945 # of PAGES W/ COVER SHT: 3

TO: DENISE STEVENS

OFFICE/CO.: HAZARDOUS WASTE ALBANY N.Y.S.D.E.C.

FAX# 518-457-0629

FROM: TOM GRASEK

SENECA ARMY DEPOT
FAX# (607) 869-1362
PHONE# (607) 869-1532

COMMENTS: Here what you requested

SENECA ARMY DEPOT ACTIVITY

BLDG 123

ROMULUS, N.Y.

14541

DIRECTORATE of ENGINEERING and HOUSING

DATE: 13 OCT 93 TIME: 1000 # of PAGES W/ COVER SHT: 3

TO: CLIFF RICHMOND

OFFICE/CO.: N.Y.S.D.E.C.

FAX# 716 226-2466

FROM: TOM GRASEK

SENECA ARMY DEPOT
FAX# (607) 869-1362
PHONE# (607) 869-1532

COMMENTS: Denise Stevens told me to Fax this to you. I will be mailing you the original today. I found it in my inventory book of Hazardous waste

Bldg 803

Mixed

ROOM 1
HOT ROOM WASTE

CNTR	SERNO		ISOTOPE	CONTENTS	INT PKG	
6-89	F002		U235	SOLID	14	
1-87	F002		U238	SOLID	19	
~~7-89~~	~~F002~~		~~U235~~	~~SOLID~~	~~9~~	
8-89	F002		U235	SOLID	7	
9-89	F002		U235	SOLID	15	
10-88	F002		U238	SOLID	21	
6-87	F002		U235	SOLID	10	
2-90	F002		U238	SOLID	UNK	
8-90	D001		U238\U235	SOLID	UNK	U238 W/ALCOHOL U238 W/FREON
7-90	D001		U235	SOLID	6	
10-89	F002		U235	SOLID	8	
5-88	F002		U235	SOLID	10	
8-88	F002		U235	SOLID	16	
7-85	F002					

* Inventory should show all appropriate waste codes

7-90
7-89
6-89
} Corrosion Beginning at bases — Puddled Condensation on cement floor

---

Bldg 815

Mixed

6-91	Trichlor	Rad Waste w/ "	} No haz waste Labels	
6-91	Alcohol	Rad Waste w/ "		
Haz Only	Acetone	F003, D001	(No date)	Not full
	Alodine	D002/D007	6 May 91	} Accum date
	Acetone	F003/D001	18 Jan 91	
	Freon	F002	18 Jan 91	
	Toluene	F005/D001	18 Jan 91	

No haz waste Signs on these two storage areas

Bldg 301 Suspected PCB wastes storage area

1 motor in overpack

1 transformer

1 giant capacitor 586 ± in open metal overpack

1 oil switch (drummed)

Bishop, Cleary, Reynolds } No Update of training

workers in Bldg 815

Hand delivered 19 Nov 93
1400 hrs

SDSTO-SEI-PE

19 NOV 1993

MEMORANDUM THRU CHIEF, INSTALLATION MANAGEMENT DIVISION

FOR SUPERVISORS OF HAZARDOUS WASTE GENERATION AREAS

SUBJECT: Responsibilities of supervisors of hazardous waste generators

1. References:

a. SEDA regulation 420-2, Hazardous Waste Management dated 19 May 1993.

b. New York State Dept. of Environmental Conservation Hazardous Waste Compliance Inspection Notice of Violation letter dated 19 October 1993.

2. This memorandum will serve as a official reminder that you are responsible to ensure that the policies stated in the above referenced regulation are carefully and completely observed, to include the proper labeling of hazardous waste containers. Failure to comply with any part of this regulation could result in disciplinary action being taken against you.

Stephen M Absolom

STEPHEN M. ABSOLOM
C, Public Works

I, Clifford O. Richmond, received a response to the hazardous waste inspection notice of violation, hand-delivered by Tom Grasek on November 18, 1993 at approximately 1:30 pm.

Clifford O. Richmond
11-18-93

registered mail sent return receipt requested 11-18-93 2 o'clock mail

with a copy to:

Janakrai Desai
NYS Department of Environmental Conservation
Division of Hazardous Substances Regulation
Hazardous Waste Regulatory Unit
50 Wolf Road - Room 208/204
Albany, NY 12233-7252
(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

Dixon Rollins, P. E.
Regional Hazardous Substances Engineer
Division of Hazardous Substances Regulation

db
Enclosure

cc: J. Desai, Reviewer
S. Carlomagno
Mr. Parag Amin, Reviewer
Seneca County Health Department

SDSTO-SEI-PE

JUN 1993

MEMORANDUM THRU CHIEF, INSTALLATION MANAGEMENT DIVISION

FOR SUPERVISORS OF HAZARDOUS WASTE GENERATION AREAS

SUBJECT: Responsibilities of supervisors of hazardous waste generators

1. References:

a. SEDA regulation 420-2, Hazardous Waste Management dated 19 May 1993.

b. New York State Dept. of Environmental Conservation Hazardous Waste Compliance Inspection Notice of Violation letter dated 19 October 1993.

2. This memorandum will serve as a official reminder that you are responsible to ensure that the policies stated in the above referenced regulation are carefully and completely observed, to include the proper labeling of hazardous waste containers. Failure to comply with any part of this regulation could result in disciplinary action being taken against you.

Stephen M Absolom

STEPHEN M. ABSOLOM
C, Public Works

29 Nov 93

Copies sent to PWB
IMB
SECURITY
CAB

Hand delivered 19 Nov 93
1900hrs

SDSTO-SEI-FE

19 NOV 1993

MEMORANDUM FOR CHIEF, MISSIONS OPERATIONS DIVISION

SUBJECT: Responsibilities of the Manager of the Mixed Wastes Conforming Storage located in building 803.

1. References:

a. SEDA regulation 420-2, Hazardous Waste Management dated 19 May 1993.

b. New York State Dept. of Environmental Conservation Hazardous Waste Compliance Inspection Notice of Violation letter dated 19 October 1993.

2. This memorandum will serve as a official reminder, that you are responsible to ensure that the policies stated in the above referenced regulation are carefully and completely observed, to include the proper management of the mixed wastes conforming storage facility located in building 803. Failure to comply with any part of this regulation could result in disciplinary action being taken against you.

Stephen M Absolom

STEPHEN M. ABSOLOM
C, Public Works Center

Hand delivered 19 Nov 93
1700 hrs

SDSTO-SEI-PE

19 NOV 1993

MEMORANDUM THRU CHIEF, MISSIONS OPERATIONS DIVISION

FOR SUPERVISORS OF HAZARDOUS WASTE GENERATION AREAS

SUBJECT: Responsibilities of supervisors of hazardous waste generators

1. References:

a. SEDA regulation 420-2, Hazardous Waste Management dated 19 May 1993.

b. New York State Dept. of Environmental Conservation Hazardous Waste Compliance Inspection Notice of Violation letter dated 19 October 1993.

2. This memorandum will serve as a official reminder that you are responsible to ensure that the policies stated in the above referenced regulation are carefully and completely observed, to include the proper labeling of hazardous waste containers. Failure to comply with any part of this regulation could result in disciplinary action being taken against you.

Stephen M Absolom

STEPHEN M. ABSOLOM
C, Public Works

DEPARTMENT OF THE ARMY
SENECA ARMY DEPOT ACTIVITY
ROMULUS, NEW YORK 14541-5001

REPLY TO ATTENTION OF

November 17,1993

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 is in reference to the hazardous waste compliance inspection on September 23, 1993 of Seneca Army Depot Activity (SEDA), EPA Identification Number NY0213820830.

In reference to your letter dated October 19,1993 regarding the compliance inspection noted above, please note the following information and corrective actions:

6NYCRR Part 372.2(a)(2) requires a person who generates a solid waste, to determine if that waste is a hazardous waste.

According to the inspection SEDA had not made this determination on a motor controller in a timely manner. This controller had been taken out of service on 11-9-90 and was being stored in building 301, SEDA's conforming storage facility for PCB contaminated electrical equipment.

SEDA's management practices were reviewed with respect to this controller. SEDA's priority is to place all electrical equipment, when removed from service, into conforming storage (building 301) as a "suspect" PCB item(i.e., suspected of being contaminated with PCB's). Subsequent testing and appropriate disposal occurs after storage in building 301. Previous test results for this controller could not be found. To insure future determinations are made in a timely manner, SEDA will have monthly hazardous waste analyses preformed for items in storage which have not been tested. Results of these analyses will be maintained under a file for hazardous waste determinations. The test results will be filed on a monthly basis.

The motor controller was tested during the October testing and is less then 2 ppm PCB's and as a result this motor controller is not a hazardous waste. A copy of the laboratory analysis is attached (enclosure 1).

6NYCRR Part 373-1.1(d)(1)(iii) requires a generator who accumulates any hazardous waste on-site for a period of 90 days

or less, or in quantities less than 8,800 gallons in containers or 20,000 gallons in tanks, to meet the following requirements in order to not be subject to the regulations applicable to hazardous waste treatment, storage and disposal facilities:

- the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container.

This involved one 55 gallon drum of acetone swipes, which was located in building 815. This drum did not have an accumulation start date on it. As soon as this violation was noted the accumulation start date was printed onto this drum, in the presence of New York State Department of Environmental Conservation (NYSDEC) Hazardous Waste Compliance Inspector Denise Stephens the day of the inspection. All hazardous waste managers have received a written reminder that they are personally responsible for all hazardous waste generated by their activity to include proper labeling of drums.

- a label or sign stating "Hazardous Waste" must identify all areas, tanks, and containers used to accumulate hazardous waste. In addition, tanks and containers must be marked with other words to identify their contents.

This involved two 55 gallon drums of mixed waste which were located in building 815. Both of these drums were marked as radioactive waste but did not indicate that they were mixed waste. As soon as this violation was noted a properly completed hazardous waste label was placed on each drum, in the presence of NYSDEC Hazardous Waste Inspector Denise Stephens the day of the inspection. All hazardous waste managers have received a written reminder that they are personally responsible for hazardous waste generated by their activity to include proper labeling of drums.

- if the generator accumulates more than 1,000 kilograms of hazardous waste or 1 kilogram of acute hazardous waste, all hazardous wastes stored in areas not excluded from contributing to the above amounts must be transported off-site or reclaimed, treated, or disposed of on-site within 90 days of their placement in the storage areas.

This involved the same two drums of mixed waste identified above. Both of these drums have been moved into building 803, SEDA's conforming storage facility for mixed waste. It should be noted that neither drum was full.

The distinction between a "90-day accumulation area" and time frames for a satellite accumulation area at the point of generation needs to be addressed. This situation is described in SEDA's Part 373 permit application, Section D, paragraph 1.3, Container Management Practices. Point-of-generation accumulation areas are "satellites" of the respective conforming storage areas. The container, when full, is transferred to the conforming

storage area. This accumulation is performed under 6NYCRR Part 372.2(a)(8)(i)(a), where a generator may accumulate "up to 55 gallons of hazardous waste" at the point of generation. The 90-day clock starts when the container is full, not the start of filling the container.

6NYCRR Part 373-3.9(b) requires that if a container holding hazardous waste is not in good condition, or begins to leak, the owner or operator must transfer the hazardous waste from this container to a container that is in good condition, or manage the waste in some other way that complies with the requirements of this Part.

This involved three drums in building 803, SEDA's conforming storage facility for mixed waste. These drums were experiencing some corrosion at the bottom, from sitting on a moist surface. The moisture they were sitting in was condensation (water). In the judgement of the facility manager, the corrosion noted was superficial, on the bottom rim only. Management practices have been reviewed and all the drums in this facility have been raised up off the floor, to prevent them from sitting in the condensation and to facilitate inspection. The three drums that showed signs of rust have had the rust removed and have been coated with a rust preventive compound.

6NYCRR Part 373-3.2(g)(1),(2),(3) requires that facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this Subpart. In addition, the owner or operator must ensure that:

- Facility personnel take part in an annual review of the initial training required.

Seneca's Part 373 application describes SEDA's training organization; SEDA trains the supervisors responsible for operations which generate hazardous wastes. Other personnel directly involved with hazardous waste handling are then trained by their trained supervisors, this training is site specific for the task at hand and is preformed at the actual job site (i.e., not in a classroom).

The three employees identified during the inspection as not having been trained, were recently transferred to their present positions. Unfortunately proper documentation of their hazardous waste training did not exist. They have now been trained in hazardous waste handling as it relates to their specific job duties. This training has been documented and is on file at SEDA's Environmental office.

SEDA in an effort to ensure that all supervisors who manage hazardous waste activities were properly trained,

conducted two hazardous waste handling review workshops this year with a total attendance of 30 supervisors. The next hazardous waste handling review workshop is scheduled for 8 December 1993.

6NYCRR Part 373-3.5(c) requires the owner or operator of a hazardous waste facility to keep 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.

This involved the inventory list for building 803, SEDA's conforming storage facility for mixed waste, which did not identify the hazardous waste that was mixed with radioactive waste. The inventory has been updated and now includes radioactive waste name, hazardous waste name and EPA waste codes, date placed in storage and quantity of waste. The manager of this facility has received a written reminder of his responsibility to insure the inventory is complete.

6NYCRR Part 376.5(a)(1)(i) permits a generator to store restricted wastes provided the following condition is met:

- stores all restricted for 90 days or less.

This involved two 55 gallon drums of acetone swipes, one 55 gallon drum of Toluene swipes, one 55 gallon drum of Freon swipes and one 55 gallon drum of Alodine which were located in Building 815. It should be noted that none of these drums were full. All of these drums have been moved to building 307 SEDA's conforming storage facility for hazardous waste.

The distinction between a "90-day accumulation area" and time frames for a satellite accumulation area at the point of generation needs to be addressed. This situation is described in SEDA's Part 373 permit application, Section D, paragraph 1.3, Container Management Practices. Point-of-generation accumulation areas are "satellites" of the respective conforming storage areas. The container, when full, is transferred to the conforming storage area. This accumulation is performed under 6NYCRR Part 372.2(a)(8)(i)(a), where a generator may accumulate "up to 55 gallons of hazardous waste" at the point of generation. The 90-day clock starts when the container is full, not the start of filling the container.

6NYCRR Part 376.5(1)(1)(ii) permits the owner or operator of hazardous waste treatment, storage or disposal facility to store restricted wastes in tanks or containers up to one year solely for the purpose of the accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment, or disposal.

This involved wastes stored in building 307 SEDA's conforming storage facility for hazardous waste and building 803 SEDA's conforming storage facility for mixed waste.

Building 307 contains the following containers which have accumulation start dates of over one year ago.

four - 55 gallon DS-2 wastes D002
one - 6 gallon container Nicad batteries D006
one - 85 gallon overpack pesticide rinse water (lindane) D013
one - 55 gallon drum pentachlorophenol D037

All the containers, except the pentachlorophenol, are scheduled for disposal and will be transported off site within the next 90 days. The pentachlorophenol is awaiting a Department of Defense one time contract to dispose of this waste. The effort to locate a facility with the ability to properly dispose of dioxin type wastes has been ongoing for quite some time now. However according to the latest correspondence dated 30 Jun 93 (enclosure 2) an incinerator has been approved to dispose of dioxin contaminated wastes. The Defense Logistics Agency is awaiting finalization of a contract for the disposal of all the Department of Army's pentachlorophenol to include the one drum in building 307. Because of national capacity of dioxin containing wastes, a waiver to store the pentachlorophenol over one year will be requested under separate cover.

In the case of building 803, which stores mixed wastes, the Federal Facility Compliance Act of 1992 placed a three year variance on disposal of mixed wastes due to national capacity.

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,

Roy E. Johnson

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

Enclosures
Copies furnished:
Janakrai Desai, Reviewer, NYSDEC (Albany)
Mr. Parag Amin, Reviewer, NYSDEC (Albany)

New York State Department of Environmental Conservation
6274 East Avon-Lima Road, Avon, NY 14414

Thomas C. Jorling
Commissioner

12-22-93 MET 12-22-93
Tom Mack
Steve mtg

December 13, 1993

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

Dear Mr. Battaglia:

Re: Hazardous Waste Compliance Inspection Date:
September 23, 1993
Location of Handler: Same as Above

EPA Identification Number: NY0213820830

Your submittals in response to the warning letter dated November 17, 1993 have been deemed satisfactory. This matter can now be considered concluded and the enforcement action resolved.

Within 30 days from the receipt of this letter, please inform the Department, in writing, of your progress in disposing of the drum of pentachlorophenol.

This letter does not address the violation regarding Land Disposal Restrictions on the storage of your mixed wastes. The Albany office is currently handling that aspect of the inspection. If you have any questions regarding this matter, feel free to contact Clifford Richmond at (716) 226-2466.

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. If your facility should be found in violation of the regulations in the future, you may be subject to escalated enforcement action, including monetary penalties.

Please note that this letter in no way addresses any liability you may have for any regulatory fees and hazardous waste special assessment fees.

Very truly,

Dixon Rollins

Dixon Rollins, P.E.
Regional Hazardous
Substances Engineer
Division of Hazardous
Substances Regulation

db

cc: J. Desai
C. Richmond
P. Amin

SENECA ARMY DEPOT
ACTIVITY

BLDG 123
ROMULUS, N.Y.
14541

FACILITY ENGINEERING BRANCH

DATE: 21 Dec 93 TIME: 1350 # of PAGES W/ COVER SHT: 2

TO: See Distribution

OFFICE/CO.: _____

_____

FAX# _____

FROM: [signature]
SENECA ARMY DEPOT ACTIVITY
FAX# (607) 869-1362
PHONE# (607) 869-1532

COMMENTS: Distribution: TOAD-ENV (GMACIEJEWSKI)
DESCOM-ENV (DMICHAELS)

FYI

****
*** ACTIVITY REPORT ***
****

TRANSMISSION OK

TX/RX NO.	6101
CONNECTION TEL	667172678264
CONNECTION ID	DESCOM-ENV
START TIME	12/21 13:44
USAGE TIME	00'57
PAGES	2
RESULT	OK

****
*** ACTIVITY REPORT ***
****

TRANSMISSION OK

TX/RX NO.	6100
CONNECTION TEL	667178947005
CONNECTION ID	TOAD-ENV
START TIME	12/21 13:42
USAGE TIME	00'58
PAGES	2
RESULT	OK

conducted two hazardous waste handling review workshops this year with a total attendance of 30 supervisors. The next hazardous waste handling review workshop is scheduled for 8 December 1993.

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Sincerely,

Roy E. Johnson

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

Enclosures
Copies furnished:
Janakrai Desai, Reviewer, NYSDEC (Albany)
Mr. Parag Amin, Reviewer, NYSDEC (Albany)

New York State Department of Environmental Conservation
6274 East Avon-Lima Road, Avon, NY 14414

Thomas C. Jorling
Commissioner

12.22.93 MET 12.22.93

December 13, 1993

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

Dear Mr. Battaglia:

Re: Hazardous Waste Compliance Inspection Date:
September 23, 1993
Location of Handler: Same as Above

EPA Identification Number: NY0213820830

Your submittals in response to the warning letter dated November 17, 1993 have been deemed satisfactory. This matter can now be considered concluded and the enforcement action resolved.

Within 30 days from the receipt of this letter, please inform the Department, in writing, of your progress in disposing of the drum of pentachlorophenol.

This letter does not address the violation regarding Land Disposal Restrictions on the storage of your mixed wastes. The Albany office is currently handling that aspect of the inspection. If you have any questions regarding this matter, feel free to contact Clifford Richmond at (716) 226-2466.

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. If your facility should be found in violation of the regulations in the future, you may be subject to escalated enforcement action, including monetary penalties.

Please note that this letter in no way addresses any liability you may have for any regulatory fees and hazardous waste special assessment fees.

Very truly,

Dixon Rollins

Dixon Rollins, P.E.
Regional Hazardous
Substances Engineer
Division of Hazardous
Substances Regulation

db

cc: J. Desai
C. Richmond
P. Amin

SENECA ARMY DEPOT ACTIVITY

BLDG 123
ROMULUS, N.Y.
14541

MISSION FIRST
PEOPLE ALWAYS

FACILITY ENGINEERING BRANCH

DATE: 4 JAN 94 TIME: 0930 # of PAGES W/ COVER SHT: 2

TO: DENISE BORRUSO
OFFICE/CO.: DRMO
GRIFFISS AFB, NY
FAX# 587-7736

FROM: TOM GRASEK
SENECA ARMY DEPOT ACTIVITY
FAX# (607) 869-1362
PHONE# (607) 869-1532

COMMENTS: HERE IS A COPY OF NYSDEC'S HAZARDOUS WASTE COMPLIANCE INSPECTION RESPONSE LETTER WHICH REQUEST THAT SEDA PROVIDE THEM WITH A UPDATE ON THE PROGRESS OF DISPOSING OF THE DRUM OF PENTACHLOROPHENOL IN STORAGE HERE. PLEASE PROVIDE ANY INFORMATION YOU CAN ON THIS.

THANKS
TOM GRASEK

New York State Department of Environmental Conservation
6274 East Avon-Lima Road, Avon, NY 14414

Thomas C. Jorling
Commissioner

December 29, 1993

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

Dear Mr. Battaglia:

Re: **Distinction between "90-Day Storage Area" and "Satellite Accumulation Area"**
EPA ID #NY0213820830

In your November 17, 1993 letter to the Department you asked for a distinction between a "90-day accumulation area" and a "satellite accumulation area". Any fully regulated generator (generates in a calendar month, or has on site at any time, greater than 1000 kg [2200 lb] of hazardous waste or greater than 1 kg [2.2 lb] of an accutely hazardous waste [a "P-code" waste]) may store any waste(s) for up to 90 days without a Part 373 Permit or Interim Status under the following conditions [detailed in Part 373-1.1(d)(1)(iii)]. A generator may not store more than 8,800 gallons of waste in containers or 20,000 gallons in tanks and must meet the applicable sections of Parts 370, 371, and 372, 374, 373-3, and 376. The 90-day time limit starts when the generator initially accumulates more than 1000 kg and applies to all waste containers and tanks that are not permitted or exempted (such as the provision described below).

Although the term "satellite accumulation area" is commonly used for the provision defined below, the term has no regulatory definition in our regulations or the federal regulations. Title 6 NYCRR Part 372.2(a)(8)(i)(a) states that a generator may accumulate up to 55 gallons of hazardous waste or one quart of acutely hazardous waste listed in Section 371.4(b), (c), and (d)(5) of this Title in containers at or near any point of generation where wastes **initially accumulate**, which is **under the control of the operator of the process generating the waste**, without a permit or interim status and without complying with subparagraph (ii) of this paragraph provided he:

(1) complies with Section 373-3.9(b)-(d) of this Title; and

(2) marks his container with the words "Hazardous Waste" and with other words that identify the contents of the containers.

Based upon a review of the procedures leading to the generation of the wastes associated with the drums in question, the sections (above) which appear in bold text have not been satisfied. As was explained to the inspectors, several different workers first deposit materials e.g., "swipes", in a smaller intermediate container before the waste is deposited into the drums. It is in these smaller containers where the waste **initially accumulates**. Further, because these small containers are where the wastes initially accumulate, each operator actually looses control of the waste that he generated when he puts it into a drum which is also being added to by other workers. Although your permit application states that shop supervisors are responsible for insuring that these areas comply with the above referenced provision, the shop supervisor would not be viewed as a process operator in control of the waste under these operating practices.

If you have further questions regarding this matter, feel free to contact Clifford Richmond of my staff at (716)226-2466.

Sincerely,

Dixon Rollins

Dixon Rollins, P. E.
Regional Hazardous
Substances Engineer
Division of Hazardous
Substances Regulation

db

cc: J. Desai
P. Amin

JTING AND TRANSMITTAL SLIP Date 11/2/93

(Name, office symbol, room number, building, Agency/Post)	Initials	Date
1. Tom G	TG	11-2-93
2. Mark P	MRP	11-8-93
3.		
4. Tom G		
5.		

	Action		File		Note and Return
	Approval		For Clearance		Per Conversation
	As Requested		For Correction		Prepare Reply
	Circulate		For Your Information		See Me
	Comment		Investigate		Signature
	Coordination		Justify		

REMARKS

We'll need to responde with the correct answers prior to the 19th. Tom you'll have the lead task Please come see me with proposed responses.

NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

(Name, org. symbol, Agency/Post)	Room No.—Bldg.
M Absolom	Phone No.

0 - 192-783

OPTIONAL FORM 41 (Rev. 7-76)
Prescribed by GSA
FPMR (41 CFR) 101-11.206

ROUTING AND TRANSMITTAL SLIP

Date: 27 OCT 93

TO: (Name, office symbol, room number, building, Agency/Post)	Initials	Date
1. Steve		
2.		
3.		
4.		
5.		

	Action		File		Note and Return
	Approval		For Clearance		Per Conversation
	As Requested		For Correction		Prepare Reply
	Circulate		For Your Information		See Me
	Comment		Investigate		Signature
	Coordination		Justify		

REMARKS

ENCL IS THE STATE'S INSPECTION LETTER - 5:19 NOV 93.

I HAVE NO CONTROL OVER ANY OF THESE VIOLATIONS

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)

RANDY

Room No.—Bldg.

Phone No.

5041-102

GPO : 1987 O - 192-783

OPTIONAL FORM 41 (Rev. 7-76)
Prescribed by GSA
FPMR (41 CFR) 101-11.206

New York State Department of Environmental Conservation
6274 East Avon-Lima Road, Avon, NY 14414

Thomas C. Jorling
Commissioner

CERTIFIED MAIL RETURN RECEIPT REQUESTED

October 19, 1993

20 OCT REC'D

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

Dear Mr. Battaglia:

Re: **Hazardous Waste Compliance Inspection Date: September 23, 1993**
Location of Handler: Same as Above

EPA Identification Number: NY0213820830

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(a)(2) requires a person who generates a solid waste, to determine if that waste is a hazardous waste. You have not made this determination and, therefore, are in violation of 6NYCRR Part 372.2(a)(2).

6NYCRR Part 373-1.1(d)(1)(iii) requires a generator who accumulates any hazardous waste on-site for a period of 90 days or less, or in quantities less than 8,800 gallons in containers or 20,000 gallons in tanks, to meet the following requirements in order to not be subject to the regulations applicable to hazardous waste treatment, storage and disposal facilities (other than the storage of liquid hazardous wastes in the counties of Kings, Nassau, Queens and Suffolk):

- the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container.

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

6NYCRR Part 376.5(a)(1)(i) permits a generator to store restricted wastes provided the following condition is met:

stores all restricted for 90 days or less.

You have not met this requirement and, therefore, are in violation of 6NYCRR Part 376.5 (a)(1)(i).

6NYCRR Part 376.5(1)(1)(ii) permits the owner or operator of a hazardous waste treatment, storage or disposal facility to store restricted wastes in tanks or containers up to one year solely for the purpose of the accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment, or disposal. You have not met this requirement and, therefore, are in violation of 6NYCRR Part 376.5(a)(1)(ii).

Violations regarding waste reduction plans will be handled by our Albany office under separate cover.

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.
Regional Hazardous Substances Engineer
NYS Department of Environmental Conservation
Division of Hazardous Substances Regulation
6274 East Avon-Lima Road
Avon, NY 14414
(716)226-2466
Attention: Mr. Clifford Richmond, Inspector

with a copy to:

Janakrai Desai
NYS Department of Environmental Conservation
Division of Hazardous Substances Regulation
Hazardous Waste Regulatory Unit
50 Wolf Road - Room 208/204
Albany, NY 12233-7252
(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

Dixon Rollins, P. E.
Regional Hazardous Substances
Engineer
Division of Hazardous
Substances Regulation

db
Enclosure

cc: J. Desai, Reviewer
S. Carlomagno
Mr. Parag Amin, Reviewer
Seneca County Health Department

INSPECTION FORM

Region: 8
LAND BASED TSDF
COMMERCIAL TSDF
OTHER TSDF X
GENERATOR X
OTHER

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: Division of Hazardous Substances Regulation
Compliance Inspection Section
~~50 Wolf Road Room 208~~
Albany, New York 12233-7252

EPA I.D. NUMBER: NY0213820830

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.) (Ms.) Randy Battaglia/Tom Graser

TITLE OF COMPANY CONTACT: Environmental Engineer

INSPECTION DATE: 9/23/1993 TIME OF INSPECTION: ___(a.m.) ___(p.m.)

INSPECTOR'S NAME: Clifford D. Richmond

TITLE: Engineering Geologist

NAME: Denise Stephens

TITLE: _____

REPORT PREPARED BY: Clifford D. Richmond DATE: 10/15/93

REPORT APPROVED BY: Gilson Collins DATE: 10/18/93

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APPENDICES

(Need Not Attach If Not Required - Circle Attached 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. — ✓ / ___

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

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

(3) ✓ Testing has shown characteristics of:

(✓) Ignitability (D001) - 371.3(b)
(✓) Corrosivity (D002) - 371.3(c)
( ) Reactivity (D003) - 371.3(d)
(✓) EP Toxicity (D004 - 017) - 371.3(e)

(4) ✓ 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) ✓ 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) ✓ The material is listed in the regulations as a waste containing PCBs. 371.4(e).

B. Is there reason, other than those above, for you to believe that there is hazardous waste on site? (Explain) _____

No

3/92

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).

B. TSD Exemptions

1. TSD exemptions

(a) N/A Recycling of Hazardous Wastes: 373-1.1(d)(1)(viii). Parts 373-2.2(c), 372.4(b), 372.4(d)(1) must be complied with (Storage of wastes prior to recycling is not exempt under this subparagraph.) In addition:

- This exemption does not apply to commercial facilities which recycle listed hazardous wastes or hazardous waste sludges received from off-site or burn these wastes for energy recovery;

- Commercial facilities that reclaim precious metals from hazardous wastes do qualify;

- This exemption does not apply to boiler and industrial furnaces that burn hazardous wastes for energy recovery if the waste stream has a heat value of less than 8,000 BTU/lb.

- Mobile or transportable commercial facilities which operate on the generator's site, if a containment area which meets the requirements of subdivision 373-2.9(f) is provided for the reclaiming facility and any associated temporary container holding or storage area.

(b) N/A The storage of the following hazardous wastes is exempt from permitting provided that Part 374 of this Title is complied with: 373-1.1(d)(1)(vii).

- hazardous wastes that are recycled in a manner constituting disposal;

- hazardous waste burned for energy recovery in boilers and industrial furnaces that are not regulated under section 373-2.15 or 373-3.15 of this Part. This exemption is not available if the hazardous waste stream has individual hazardous waste components with little or no heat value (less than 8,000 BTU/lb);

3. Hazardous Waste Special Assessment Fees - Article 27-0923 ECL

Is the company aware that a Quarterly Hazardous Waste Special Assessment Return (Form TP 550) is required for any quarter in which hazardous waste is generated and disposed of in any quantity and method that would produce an assessment of at least $27 for that quarter?* Yes ___ No ___ N/A *

* The review of Form TP 550 or the failure to submit a form when required will be the subject of a separate action by the Department.

4. Status Identification:

A. ___ Transporter - complete Appendix B

B. Generator Status Identification

1. ___ Category 1 - Conditionally Exempt Generator - generates less than 100 kg/mo and stores less than 100 kg. - 372.1(e)(1)(vii)(a) Complete Part II, 1A.

2. ___ Category 2 - Small Quantity Generator - generates less than 100 kg/mo and stores more than 100 kg but less than 1,000 kg. - 372.2(a)(8)(vi) - Complete Part II, 1B.

3. ___ Category 3 - Generator Subject to Reduced Requirements - generates more than 100 kg/mo but less than 1,000 kg/mo and stores less than 1,000 kg. - 372.2(a)(8)(iii) - Complete Part II, 1C.

4. ✓ Category 4 - Generator - generates and/or stores 1,000 kilograms or more per month or generates acute hazardous waste in quantities greater than 1 kg per month. Complete Part II, Questions 2-7. (Generators over sole source aquifers also complete Appendix A.)

C. Treatment, Storage or Disposal Facility Status

1. Hazardous waste is generated and stored on-site. If so:

(a) ✓ Is hazardous waste stored on-site longer than 90 days? 373-1.1(d)(1)(iii) - If yes, complete Appendix A.*

(b) ___ Is more than 8,800 gallons of hazardous waste stored in containers? 373-1.1(d)(1)(iii)(a) - If yes, complete Appendix A.*

* Fed. Govt exempt.

Container Storage Areas for Cat. 1-4 generators*

See * Summary

(2) 55 gallon drums waste-paint-related (D001)

Bldg 815

(1) 55 gallon drum Acetone (F003/D001) [No date]
(1) 55 gallon drum Aldrine (D002/D004) [6 May 1991]
(1) 55 gallon drum Acetone (F003/D001) [18 Jan 1991]
(1) 55 gallon drum Freon (F002) [18 Jan 1991]
(1) 55 gallon drum Toluene (F005/D001) [18 Jan 1991]

Interim Status/Permitted Storage Areas for containers:

Bldg. 307

1 gallon plastic pail amyl acetate (D001)
5 gallon pail (plastic) Naptha (D001)
5 gallon pail (steel) toluene (F005)

(1) 5 gallon plastic pail formalin (U122)
(2) boxes (wooden) w/approx. 24 Nicad batteries in each (D006)
8-18-92 → (2) 55 gallon drums of DS2 (D002)
(1) 5 gallon plastic pail overpack of lime-scale remover (D002)
5-20-92 → (1) 6 gallon plastic container of Nicad batteries (D006)
(4) 10 gallon container Flux (D002)
(1) 5 gallon overpack of mercury batteries (D009)
(4) 55 gallon drum of waste oil w/lead (D008)
11/90 → (4) 55 gallon overpack of rinsewaters w/spp lindane (D013)
(2) 55 gallon drums w/paint waste (D001)
(2) 55 gallon drums of Burn tray residue
(1) 5 gallon steel pail mineral spirits (D001)
(1) 55 gallon overpack of oil (D001)
6/88 → (1) 55 gallon drum pentachlorenbenol (D037)

Mixed Waste

Bldg 815

(1) 55 gallon drum Trichlon
(1) 55 gallon drum Alcohol

Building 803

(1) F002 U235 (55-gallon drum) [6/89]
(1) F002/U238 (55-gallon drum) [1/87]
(1) F002/U235 (55-gallon drum) [7/89]
(1) 55-gallon drum (F002/U235) [8/89]
(1) 55-gallon drum (F002/U235) [9/89]
(1) 55-gallon drum (F002/U238) [10/88]
(1) 55-gallon drum (F002/U235) [6/87]
(1) 55-gallon drum (F002/U235) [2/90]
(1) 55-gallon drum (D001/U238/U235) [8/90]
(1) 55-gallon drum (D001/U235) [7/90]
(1) 55-gallon drum (F002/U235) [10/89]
(1) 55-gallon drum (F002/U235) [5/88]
(1) 55-gallon drum (F002/U235) [8/88]
(1) 55-gallon drum (F002/U238) [7/85]

Part II

Generator Inspection Section

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

1. Requirements for Exempt and Small Quantity Generator (Category 1-3 Generators)

A. Category 1 - The conditionally exempt generator has:

1. ___ made a hazardous waste determination - 372.1(e)(1)(vii)(a). N|A

2. ___ accumulated no more than 100 kg of hazardous waste on-site - 372.1(e)(1)(vii)(b).

3. ___ disposed of hazardous waste in an authorized, permitted or licensed on-site or off-site facility - 372.1(e)(1)(vii)(c).

4. ___ ensured delivery to an off-site facility by a transporter authorized under Part 364 or by the generator himself - 372.1(e)(1)(vii)(d).

B. Category 2 - The generator who generates less than 100 kg/month and stores between 100-1000 kg has complied with the following:

General Requirement - Items 2A-E (pg. II-5)
Manifest & Reporting - Item 4A-P, except for Item G
(pgs. II-10, 11, 12)

1. ___ uses tanks that are properly sheltered and protected to prevent spillage, seepage or any discharge - 372.2(a)(8)(vi)(a).

2. ___ keeps containers and tanks holding hazardous waste closed during storage except to add or remove wastes. Containers and tanks must not be opened, handled or stored in a manner which may rupture the tank or containers or cause them to leak. Tanks and containers must be inspected at least quarterly for leaks or damage - 372.2(a)(8)(vi)(b).

3. ___ uses tanks that are designed, constructed or operated in accordance with whichever of the following requirements are in effect in the municipality where the facility is located: 372.2(a)(8)(vi)(c).

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

8. ___ ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures - 372.2(a)(8)(iii)(e)(3). NA

9. ___ the emergency coordinator or a designee have responded appropriately to any emergencies that have arisen - 372-2(a)(8)(iii)(e)(4).

Tank Storage Requirements: 373-3.10(1)
(Complete the following section)

General operating requirements:

10. ___ hazardous wastes or treatment reagents must not be placed in a tank if they could cause the tank or its inner liner to fail - 373-3.10(1)(2)(ii).

11. ___ uncovered tanks must be operated to ensure at least 60 centimeters (2 feet) of freeboard, unless there is adequate containment - 373-3.10(1)(2)(iii).

12. ___ where hazardous waste is continuously fed into a tank, the tank must be equipped with a means to stop this inflow - 373-3.10(1)(2)(iv).

13. ___ the owner or operator must mark all tanks with the words "Hazardous Waste" and with other words that identify the contents of the tanks. For underground tanks, the markings must be placed on a sign in the area above the tank - 373-3.10(1)(2)(v).

Tank(s) are inspected each operating day for:

14. ___ discharge control equipment (e.g. waste feed cutoff systems, bypass systems and drainage systems) - 373-3.10(1)(3)(i).

15. ___ monitoring equipment (e.g. pressure and temperature gauges) - 373-3.10(1)(3)(ii).

16. ___ level of waste in tank to ensure proper freeboard - 373-3.10(1)(3)(iii).

Tank(s) are inspected weekly for:

17. ___ corrosion or leaking of fixtures or seams - 373-3.10(1)(3)(iv).

18. ___ erosion or obvious signs of leakage (e.g. wet spots or dead vegetation) of the construction materials of, and the area immediately surrounding discharge confinement structures (e.g. dikes) - 373-3.10(1)(3)(v).

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

3. On-site Accumulation of Hazardous Waste Prior to Shipment

A. ___ Accumulation areas - 372.2(a)(8)(i)(a).

(1) ___ The containers appear to be in good condition and are not in danger of leaking - 373-3.9(b). N/A

(2) ___ Hazardous waste is stored in containers made of compatible materials - 373-3.9(c).

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

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

(5) ___ Containers are marked either with the words "Hazardous Waste" and with other words that identify the contents of the containers - 372.2(a)(8)(i)(a)(2).

(6) ___ Hazardous waste may be accumulated in excess of 55 gallons or 1 quart of acutely hazardous waste at 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 must be marked with the date the excess amount began accumulating - 372.2(a)(8)(i)(b).

90 Day Storage Area/Permitted Storage Area (complete as applicable and be specific)

B. ✓ All such wastes are shipped off-site to an authorized treatment, storage or disposal (TSD) facility in 90 days or less - 372.2(a)(8)(ii). ___

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

D. Standards for management of containers - 372.2(a)(8)(ii); 373-3.9 (This section will also be completed for TSD's as referred to from Appendix A.)

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

2. ✓ The containers appear to be in good condition and are not in danger of leaking. (If containers are ___

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

leaking, describe the type, condition, contents and number that are leaking or corroded. Be detailed and specific) - 373-3.9(b).

3 drums experiencing some corrosion at the bottom from sitting on a moist service (Bldg. 803 [mixed waste]) [drums dated 7-90/7-89/6-89]

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

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

5. ___ Containers holding hazardous waste must not be opened, handled or stored in a manner which may rupture the container or cause it to leak - 373-3.9(d)(2). ✓

6. ___ The storage area is inspected at least weekly - 373-3.9(e). ✓

7. The generator complies with the following special requirements related to storage of ignitable or reactive wastes. 373-3.9(f):

   (a) ___ Containers holding ignitable or reactive waste are located at least 15 meters (50 feet) from the facility property line - 373-3.9(f). ✓

   (b) ___ 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). ✓

   (c) ___ Generator has placed "No Smoking" signs conspicuously wherever there is a hazard from ignitable or reactive waste - 373-3.2(h)(1). ✓

8. The generator complies with the following special requirements related to incompatible wastes: 373-3.9(g).

   (a) ___ Incompatible wastes, or incompatible wastes and materials, are not placed in the same container,

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

(2) ___ 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

(3) ___ 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).

(4) ___ Run-on is prevented unless the system has sufficient excess capacity over that required in (3) - 373-2.9(f)(1)(iv).

(5) ___ Accumulated waste and precipitation must be removed as necessary to prevent overflow 373-2.9(f)(1)(v).

E. Standards for management of tanks: 373-3.10

1. ___ Generators complete Appendix O except for Section 373-3.10(h)(3); Items 7C1-5 (pages O-14 to O-15). [In addition, sections 373-3.7 and 3.8 which are cross-referenced do not apply except for section 373-3.7(b) and (e)].

2. ___ Generators over sole-source aquifers complete Appendix O except for Section 373-3.10(h)(3), Items 7C1-5 (pages O-14 to O-15). [Requirements of section 373-3.8 do not apply.]

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

D. Each manifest (a representative sample) has the following information: 372.2(b)(1); Appendix 30.

		Generator	Transporter 1	Transporter 2	TSDF	
1. ___	Name of	✓	✓	✓	✓	✓
2. ___	EPA ID No. of	✓	✓	✓	✓	✓
3. ___	Mailing Address of	✓	✓	✓	✓	✓
4. ___	Telephone No. of	✓	✓	✓	✓	✓
5. ___	Manifest Document #					✓
6. ___	The proper USDOT description.					✓
7. ___ ___	The appropriate: ✓ quantity, ✓ container number, container type, and ✓ waste type by units of weight or volume.					✓
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 - 372.2(a)(4) and 372.2(a)(5) and 372.2(a)(6).					✓
9. ___	Signed copies of the manifest records have been retained for at least three years - 372.2(c)(1)(i).					✓

E. ___ The generator must distribute copies of the manifest as specified on the manifest form - 372.2(b)(3). ✓

F. ___ The generator has received signed copies (from the TSD facility) of all manifests for wastes shipped off-site more than 20 days ago: ✓

___ If not, exception reports have been submitted covering these shipments - 372.2(c)(3). ✓

G. ___ A generator who ships hazardous waste <u>off-site</u> to a treatment, storage or disposal facility located within the United States must submit Annual Reports on Forms specified by the Commissioner. 372.2(c)(2). ✓

Indicate:		Indicate:	
X	Violations	X NA	Satisfactory Not Applicable

5. Personnel Training - 373-3.2(g)

A. There is a:

1. ___ written description of 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). ✓

2. ___ written job description for each position - 373-3.2(g)(4)(ii). ✓

3. ___ 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). ✓

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). ✓

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

1. ___ Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment; ✓

2. ___ Key parameters for automated waste feed cutoff systems; N/A

3. ___ Communications or alarm systems; ✓

4. ___ Response to fires and explosions; ✓

5. ___ Response to groundwater contamination incidents; and N/A

6. ___ Shutdown of operations. ✓

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). ✓

9/5 D. ✓ Facility personnel have taken part in an annual review of the initial training required - 373-3.2(g)(3). ___

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

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). ✓

F. The facility owner or operator has made an attempt in good faith to make the following arrangements with local authorities, as appropriate for the type of waste handled at the facility and the potential need for the services of these organizations - 373-3.3(g)(1):

1. ___ Arrangements to familiarize police, fire departments and emergency response teams with the functions and layout of the facility; NA

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;

3. ___ Agreements with government emergency response teams, emergency response contractors, and equipment suppliers;

4. ___ Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illness which could result from fires, explosions or releases at the facility; and

5. ___ Where state or local authorities decline to enter into such arrangements, the owner or operator has documented the refusal in the operating record. ✓

7. Contingency Plan and Emergency Procedures - 373-3.4

A. ___ The facility has a contingency plan or some other emergency plan which incorporates hazardous waste management. ✓

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

1. ___ A description of 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; ✓

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

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

3. ___ Immediately identified the character, exact source, amount and areal extent of any released materials;

4. ___ The emergency coordinator assessed possible hazards to human health and the environment;

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

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;

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;

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;

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;

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;

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;

Company Name: Seneca Army Depot
EPA ID NO: NY0213820830

WASTE REDUCTION CHECKLIST

A. Does the generator use manifests to transport the hazardous waste? Yes ✓ No ___

If No, Explain:

_____
_____
_____

B. Do the manifests contain the certification that the generator has a program in place to reduce the volume and toxicity of waste generated to the degree determined by the generator to be economically practicable? (ECL 27-0907) Yes ✓ No ___

C. Is the certification portion of the manifest crossed out or marked in any way to indicate that a program to reduce the volume and toxicity of the waste is not in place? Yes ___ No ✓

If Yes, Explain:

_____
_____
_____

D. Is the generator required to have a written Hazardous Waste Reduction Plan. (ECL 27-0908) Yes ✓ No ___

If No, Explain:

_____
_____
_____

E. Does the generator have a written Hazardous Waste Reduction Plan? (ECL 27-0908) Yes ✓ No ___

If No, Explain:

_____
_____
_____

F. If the generator does not have a written Hazardous Waste Reduction Plan, is the generator aware of the requirement to have a program in place to reduce the volume and toxicity of waste generated to the degree determined by the generator to be economically practicable? Yes ___ No ___ N/A

(12/91)

If the Hazardous Waste Reduction Plan is not a written Plan, can the generator describe orally the waste reduction program in place? Yes ___ No ___ N/A

If No, Explain:

_____

_____

_____

H. Did the generator submit a Biennial update of the Hazardous Waste Reduction Plan by July 1 of the year it is due? (The update must be submitted every two years, with the first update due two years after the Hazardous Waste Reduction Plan is submitted.) (ECL 27-0908) Yes ___ No ✓ NA ___

If No/NA Explain:

_____

_____

_____

I. Did the generator submit a Annual status report of the Hazardous Waste Reduction Plan by July 1 of the year it is due? (The status report must be submitted for each year that a Hazardous Waste Reduction Plan Biennial update is not submitted.) (ECL 27-0908) Yes ✓ No ___ NA ___

If No/NA Explain:

_____

_____

_____

Items #J thru L is applicable only to the permitted facilities.

J. Is the generator permitted for TSD activities? Yes ✓ No ___

K. Does the permit contain a condition requiring the permittee to certify annually that the generator (i.e. the permittee) of the hazardous waste has a Hazardous Waste Reduction program in place to reduce the volume or quantity and toxicity of such waste to the degree determined by the generator to be economically practicable? Yes ✓ No ___ NA ___

L. Did the permittee submit the annual certification? Yes ___ No ✓ NA ___

WASTE REDUCTION CHECKLIST
SUPPLEMENTAL INFORMATION SHEET

• The schedule for generators of hazardous waste to submit a Hazardous Waste Reduction Plan is as follows:

1. Any generator of equal to or greater than one-thousand (1000) tons of hazardous waste in the calendar year 1990 or any subsequent calendar year as reported in the Generator Annual Report shall prepare, implement and submit to DEC a written HWRP on or before July 1 of the following year.

2. Any generator of equal to or greater than five-hundred (500) tons of hazardous waste in the calendar year 1991 or any subsequent calendar year as reported in the Annual Generator Report shall prepare, implement and submit to DEC a written HWRP on or before July 1 of the following year.

3. Any generator of equal to or greater than fifty (50) tons of hazardous waste in the calendar year 1992 or any subsequent calendar year as reported in the Annual Generator Report shall prepare, implement and submit to DEC a written HWRP on or before July 1 of the following year.

4. Any generator of equal to or greater than twenty-five (25) tons of hazardous waste in the calendar year 1995 or any subsequent calendar year as reported in the Annual Generator Report shall prepare, implement and submit to DEC a written HWRP on or before July 1 of the following year.

5. Any generator required to hold a hazardous waste storage, treatment or disposal Part 373 permit for the on-site management of hazardous waste shall prepare and submit to DEC a written HWRP on or before July 1, 1991 or as part of any new permit application, and shall thereafter implement the plan.

NOTES: If the generator has any questions regarding Hazardous Waste Reduction Plan or needs literature, they should call 1-800-462-6553/518-457-6072/518-485-8400 or write to:

Bureau of Pollution Prevention
Division of Hazardous Substances Regulation
NYSDEC
50 Wolf Road
Albany, NY 12233-7253

(12/91)

WRC/mm/51

TAbL 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	FREQUENCY OF ANALYSIS MINIMUM ANNUAL TESTS
MIXED WASTES (11) (F001-F005, R001)									
Paper wipes contaminated with toluene and low level radioactive waste	1	radioactive, toxic	wipes toluene	98-100 % 0-1 %					
Paper wipes contaminated with acetone and low level radioactive waste	1	radioactive, toxic	wipes acetone	98-100 % 0-1 %					
Paper wipes contaminated with freon and low level radioactive waste	1	radioactive, toxic	wipes freon	98-100 % 0-1 %					
Paper wipes contaminated with isopropanol and low level radioactive waste	1	radioactive, toxic	wipes isopropanol	98-100 % 0-1 %					
Paper wipes contaminated with trichloroethylene and low level radioactive waste	1	radioactive, toxic	wipes trichloroethylene	98-100 % 0-1 %					

NOTES:

(1) Samples - C = Coliwasa
- T = Trier
- G = Grab

Container - GT = Glass, teflon lined lid
- P = Polyurethane

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 compatability, "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 unsaleable, it needs to be properly managed as a hazardous waste.

Company Name Seneca Army Depot

EPA ID No. NY0213820830

Appendix A

Treatment, Storage and Disposal (TSDF) Inspection Section

Also complete for generators over sole source aquifer areas.

Indicate:		Indicate:	
X	Violations	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(j) 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).

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). ✓

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). ✓

C. ___ The analysis has been repeated as necessary to ensure that it is accurate and up-to-date - 373-3.2(d)(1)(iii). ✓

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

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

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 identify of the waste designated on the accompanying manifest or shipping paper. The plan describes, at a minimum: N/A

(a) ___ The procedures which will be used to determine the identify of each movement of waste managed at the facility - 373-3.2(d)(3)(i); and

(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). ✓

3. Security - 373-3.2(e)

A. The owner or operator has prevented the unknowing entry, and minimized 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). YES OR 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 OR NO

B. If the owner or operator has not made a successful demonstration A1 and A2 above 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)(ii)(a) AND ✓

Indicate:		Indicate:
X	Violations	X Satisfactory NA Not Applicable

D. ___ The owner or operator has recorded inspections in an inspection log or summary - 373-3.2(f)(4). ✓

E. ___ The inspection log or summary has been kept for at least three years from the date of inspection - 373-3.2(f)(4). ✓

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). ✓

6. Ignitable Reactive Wastes or Incompatible Wastes - Complete Part II, Items 3.D.7 and 8; (pgs II-7 and 8). NOTE: this is for container storage only.

7. Personnel Training - Complete Part II, Item 5 (pgs. II-13 and 14).

8. Preparedness and Prevention - Complete Part II, Item 6 (pgs. II-14 and 15).

9. Contingency Plan and Emergency Procedures - Complete Part II, Item 7 (pgs. II-15 thru 18).

10. Manifest System, Recordkeeping and Reporting - Complete part II, Item 4 (pgs. II-10 thru 12). 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). ✓

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:

Put in safety 803

1. ✓ A description and the quantity of each hazardous waste received; ___

2. ___ The method(s) and date(s) of its treatment, storage or disposal at the facility; N/A

3. ___ The location of each hazardous waste within the facility and the quantity at each location; ✓

4. ___ (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; N/A

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

18. ___ 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); ✓

19. ___ For an off-site storage facility, a copy of the notice, and the certification and demonstration if applicable, required by the generator or the ownr or operator under 376.1(g); and ✓

20. ___ 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). ✓

NOTE: Items #12 -~~20~~ 17 apply only to hazardous waste that is land disposal pursuant to an extension of the effective date of any land disposal restriction pursuant to Part 376.1(e).

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. ___ determined significant discrepancies from those stated on the manifest - 372.4(b)(1)(i).

2. ___ determined that all portions of the manifest have been completed - 372.4(b)(1)(ii).
Explain: _____

_____

_____

3. ___ distribute copies of the manifest according to the instructions with the manifest form - 372.4(b)(4).

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 - 372.4(c)(1).

2. ___ filed an unmanifested waste report after accepting the waste - 372.4(c)(3).

N/A

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

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). ✓

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).

Handler Name Seneca Army Depot
EPA I.D. No. NY9213820893

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

APPENDIX H

Incinerators and Energy Recovery Units

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)): N/A

(1) ___ enable him to establish steady (normal) operating conditions - 373-3.15(b);

(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);

(b) ___ halogen content and sulfur content in the waste - 373-3.15(b)(2), and

(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).

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;

(2) ___ appropriate corrections to maintain steady state combustion conditions are made immediately, either automatically or by the operator. EXPLAIN:

(3) ___ The complete incinerator or energy recovery facility and associated equipment are inspected at least daily for leaks, spills, and fugitive emissions.

(4) ___ All emergency shut-down controls and system alarms are checked to assure proper operation.

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). ✓

Handler Name Seneca Army Dept
EPA I.D. No. NY0213820830

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

APPENDIX I

Thermal Treatment

N/A

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)

B. In addition to the waste analyses required by subdivision 373-3.16(c), 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-continous process) operating conditions (including waste and auxiliary fuel feed) - 373-3.16(c)

(2) ___ To determine the type of air contaminants which might be emitted - 373-3.16(c)

(3) ___ Heating value of the waste - 373-3.16(c)(1)

(4) ___ Halogen content and sulfur content in the waste - 373-3.16(c)(2)

(5) ___ 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)

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)

(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)

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

(3) ____ The stack plume (emmissions), where present, are observed visually at least hourly for normal appearance (color and opacity) - 373-3.16(d)(1)(ii)

(4) ____ The operator must immediately make any indicated operating corrections necessary to return any visable emissions to their normal appearance - 373-3.16(d)(1)(ii)

(5) ____ The complete thermal treatment process and associated equipment (pumps, valves, conveyors, pipes, etc.) are not 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. ____ Open burning of hazardous waste is prohibited except for the open burning and detonation of waste explosives - 373-3.16(f)

HANDLER NAME Seneca Army Depot

EPA ID# NY 0 2 1 3 8 2 0 8 3 0

APPENDIX R
LAND DISPOSAL RESTRICTIONS CHECKLIST

I. Applicability[5]

A. Unless otherwise specified, the following requirements apply to all persons who generate, transport, treat, store or dispose of hazardous waste (except conditionally exempt generators of less than 100 kg of non-acute or 1 kg of acute hazardous waste per calendar month).

B. The hazardous wastes restricted from land disposal are:

1. The hazardous wastes listed or identified in Part 371 or 376.

2. The wastes identified as hazardous based on characteristic alone (D001-D017).

II. Waste Identification[5]

A. Determine which of the following prohibited* LDR waste categories the facility manages:

	Generate	Transport	Treat	Store	Dispose
F001-F005 Solvents	✓			✓	
F020-F023 and F026-F028 Dioxins	✓			✓	
Wastes found in 376.3(b)(1)**	✓			✓	
Wastes found in 376.3(c)***	✓		✓	✓	

* These wastes are prohibited from land disposal unless the wastes meet or have been treated to meet the treatment standards of 376.4, have been granted an exemption by petition, have been granted an extension, or have been treated to meet alternative treatment standards.

** Liquid hazardous wastes containing PCBs at concentrations greater than or equal to 50 ppm, hazardous wastes containing HOCs in concentrations greater than or equal to 1,000 ppm, that are identified as hazardous by a property that does not involve HOCs, and liquid wastes that are hazardous and also contain over 134 mg/l nickel and/or 130 mg/l of thallium.

*** Formerly the First, Second and Third Thirds

NOTE: Superscript numbers indicate general applicability of sections.

1. Generator 2. Treatment Facility 3. Storage Facility
4. Land Disposal Facility 5. All

B. Waste Specific Prohibitions*. (Formerly National Capacity Variances)

* Case-by-case extentions may be granted to individual facilities for these wastes after expiration of capacity variances.

Does the facility handle the following wastes?	YES	NO
1. Soil and debris contaminated with wastes that had treatment standards set in the Third Third rule based on incineration, mercury retorting, or vitrification. (expires-05/08/92) - 376.3(c)(4).	___	✓
2. The following nonwastewaters-F039,K031,K084,K101,K102, K106,P010,P011,P012,P036,P038,P065,P087,P092,U136,U151. (expires-05/08/92) - 376.3(c)(2).	___	✓
3. The following wastes identified as hazardous based on a characteristic alone: D004 (nonwastewaters), D008 (lead materials stored before secondary smelting), D009 (nonwastewaters) (expires 05/08/92) - 376.3(c)(2).	___	✓
4. Inorganic solid debris*; includes chromium refractory bricks carrying EPA Hazardous Waste Nos. K048-K052 (expires-05/08/92) - 376.3(c)(2).	___	✓

* Inorganic Solid Debris means nonfriable inorganic solids contaminated with D004-D011 hazardous wastes that are incapable of passing through a 9.5 mm standard sieve; and that require cutting, or crushing and grinding in mechanical sizing equipment prior to stabilization, and are limited to metal slags (either dross or scoria); glassified slag; glass; concrete; masonry and refractory bricks; metal cans, containers, drums or tanks; metal nuts, bolts, pipes, pumps, valves, appliances or industrial equipment; and scrap metal as defined in 370.2(c).

5. RCRA hazardous wastes that contain naturally occurring radioactive materials (expires-05/08/92) - 376.3(c)(2).	___	✓
6. Wastes that are mixed radioactive/hazardous wastes, and soil or debris contaminated with mixed radioactive/hazardous wastes (expires-05/08/92) - 376.3(c)(3).	✓	___

If yes to any of 1 through 6 above, identify the waste(s).

_____

_____

_____

III. Prohibitions, Exemptions, Extensions[5]

A. Dilution Prohibited as a Substitute for Treatment.

	YES	NO
1. Does the generator, transporter, handler, or owner or operator of a treatment, storage or disposal facility dilute characteristic hazardous wastes (in a treatment system which treats wastes subsequently discharged to NYS waters) pursuant to a SPDES permit or for purposes of pretreatment under the Clean Water Act? - 376.1(c)(2). (Complete Appendix A or Q, as applicable)	___	✓

	YES	NO
2. Other than as described in 1. above, has the generator, transporter, handler, or owner or operator of a treatment, storage or disposal facility in any way diluted a restricted waste or the residual from treatment of a restricted waste: - 376.1(c)(1).	___	✓
a. As a substitute for adequate treatment to achieve compliance with section 376.4.	___	✓
b. To otherwise avoid a prohibition in section 376.3.	___	✓
c. To circumvent a land disposal prohibition imposed by Article 27.	___	✓

If yes to a, b, or c above, identify the waste and provide a brief description of the dilution process.

_____

_____

_____

B. Surface Impoundment Treatment.[2]

	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).	___	✓

If no, go to C.

* 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.

_____

_____

X Violations

X Satisfactory
NA Not Applicable

N/A

1. ___ Treatment of the prohibited wastes occurs in the impoundments - 376.1(d)(1)(i).

2. ___ The following conditions have been met: 376.1(d)(1)(ii).

   a. ___ The residues from treatment are analyzed to determine if they meet the applicable treatment standards or prohibition levels - 376.1(d)(1)(ii)(a).

   b. ___ 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).

   c. ___ The following treatment residues (including any liquid) are removed at least annually * - 376.1(d)(1)(ii)(b).

      (1) ___ Residues which do not meet the treatment standards promulgated under 376.4.

      (2) ___ Residues which meet or exceed the prohibition levels established under 376.3 or imposed by statute.

      (3) ___ Residues which are from the treatment of wastes prohibited from land disposal under 376.3.

      (4) ___ Residues from managing listed wastes which are not delisted under 370.3(c).

* 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.

   d. ___ Treatment residues have not been placed in any other surface impoundment for subsequent management after original placement - 376.1(d)(1)(ii)(c).

   e. ___ 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).

X Violation

X Satisfactory
NA Not Applicable

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 ground water 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). ✓

C. Case-by-Case Extensions.[5]

	YES	NO
Does the facility handle any wastes subject to a case-by-case extension to an effective date? - 376.1(e).	___	✓

If no, go to D.

Identify the waste(s) subject to extension.

_____

_____

X Violations

X Satisfactory
NA Not Applicable

1. ___ The facility* has submitted an application containing the required demonstration to the Commissioner for an extension of the effective date established under section 376.3 - 376.1(e)(1). N/A

2. ___ The application is signed by an authorized representative and contains the required certification - 376.1(e)(2).

3. ___ Pending a decision on the application for an extension, the applicant has complied with all restrictions on land disposal once the effective date for the waste has been reached - 376.1(e)(9).

4. ___ The person granted** the extension has immediately notified the Commissioner as soon as he has any knowledge of any change in the conditions certified to in the application - 376.1(e)(6).

5. ___ The person granted** the extension has submitted progress reports at the intervals designated by the Commissioner - 376.1(e)(7). ✓

* In this case, facility refers to any person who generates, treats, or disposes of a hazardous waste.

** During the period for which an extension established by the Commissioner is in effect, the storage prohibitions in 376.5 do not apply.

X Violation

X Satisfactory
NA Not Applicable

6. ___ The progress reports must: - 376.1(e)(7) N/A

a. ___ Describe the overall progress made toward constructing or otherwise providing alternative treatment, recovery, or disposal capacity,

b. ___ Identify any event which may cause or has caused a delay in the development of the capacity, and

c. ___ Summarize the steps taken to mitigate the delay.

7. ___ Hazardous waste has been disposed of in an interim status landfill which is in compliance with the technical requirements of 373-3.6 and 373-3.14(j)(1), (3) and (4) - 376.1(e)(8)(ii)(a).*

8. ___ Hazardous waste has been disposed of in a permitted landfill which is in compliance with the technical requirements of 373-2.6 and 373-2.14(c)(3), (4), and (5) - 376.1(e)(8)(ii)(b).*

9. ___ Hazardous waste has been disposed of in an interim status surface impoundment which is in compliance with the technical requirements of 373-3.6 and 373-3.11(i)(1), (3) and (4) - 376.1(e)(8)(ii)(c).*

10. ___ Hazardous waste has been disposed of in a permitted surface impoundment which is in compliance with the technical requirements of 373-2.6 and 373-2.11(b)(3), (4), and (5) - 376.1(e)(8)(ii)(d).*

11. ___ Containerized liquid hazardous wastes containing PCBs at concentrations greater than or equal to 50 ppm but less than 500 ppm have been disposed of in a landfill which is also in compliance with the technical requirements of 40 CFR 761.75 (TOSCA), 371.4(e), 373-2, and 373-3 - 376.1(e)(8)(ii)(e).*

* These requirements apply only when the Commissioner establishes an extension to an effective date under subdivision, and only during the period for which such extension is in effect. In addition the storage restrictions under 376.5 do not apply.

D. **Petitions to Allow Land Disposal.**[4]

	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).

If no, go to IV.

Identify the wastes subject to exemption.

_____

_____

1. ___ The facility has submitted a petition for an exemption from a prohibition of the land disposal of a restricted hazardous waste in a particular unit to the Commissioner demonstrating that there will be no migration of hazardous constituents from the disposal unit for as long as the wastes remain hazardous - 376.1(f)(1). N/A

2. ___ The petition includes the following: -376.1(f)(3)

   a. ___ A monitoring plan that describes the monitoring program installed at and/or around the unit to verify continued compliance with the conditions of the exemption and provides information on the monitoring of the unit and/or the environment around the unit - 376.1(f)(3)(i).

   b. ___ The following specific information is included in the plan - 376.1(f)(3)(i).

      (1) ___ The media monitored in the cases where monitoring of the environment around the unit is required - 376.1(f)(3)(i)(a).

      (2) ___ The type of monitoring conducted at the in the cases where monitoring of the unit is required - 376.1(f)(3)(i)(b).

      (3) ___ The location of the monitoring stations - 376.1(f)(3)(i)(c).

      (4) ___ The monitoring interval (frequency of monitoring at each station) - 376.1(f)(3)(i)(d).

      (5) ___ The specific hazardous constituents to be monitored - 376.1(f)(3)(i)(e).

      (6) ___ The implementation schedule for the monitoring program - 376.1(f)(3)(i)(f).

      (7) ___ The equipment used at the monitoring stations - 376.1(f)(3)(i)(g).

X Violation

X Satisfactory
NA Not Applicable

(8) ___ The sampling and analytical techniques - 376.1(f)(3)(i)(h). NA

(9) ___ The data recording/reporting procedures techniques - 376.1(f)(3)(i)(h).

c. ___ The monitoring data collected according to the monitoring plan has been sent to the Commissioner according to the format and schedule specified and approved in the monitoring plan - 376.1(f)(3)(iii).

d. ___ A copy of the monitoring data collected under the monitoring plan is kept on-site in the operating record at the facility - 376.1(f)(3)(iv).

e. ___ The monitoring program, specified in 2a & b above, meets the following criteria: - 376.1(f)(3)(v).

(1) ___ All sampling, testing, and analytical data must be approved by the Commissioner and must provide data that is accurate and reproducible - 376.1(f)(3)(v)(a).

(2) ___ All estimation and monitoring techniques must be approved by the Commissioner, and - 376.1(f)(3)(v)(b).

(3) ___ A quality assurance and quality control plan must be provided to and approved by the Commissioner - 376.1(f)(3)(v)(c).

3. ___ The petition has been submitted to the Commissioner - 376.1(f)(4).

4. ___ After the petition has been approved, the owner or operator has reported any changes in conditions at the unit and/or the environment around the unit that significantly depart from the conditions described in the exemption and affect the potential for migration of hazardous conditions from the unit -376.1(f)(5).

5. ___ If the owner or operator determines that there is migration of hazardous constituent(s) from the unit, he has done the following: -376.1(f)(6).

a. ___ Immediately suspended receipt of prohibited waste at the unit, and - 376.1(f)(6)(i).

b. ___ Notified the Commissioner, in writing, within 10 days of the determination that a release occurred - 376.1(f)(6)(ii).

X Violation

X Satisfactory
NA Not Applicable

6. ___ The petition contains the required certification - 376.1(f)(7). N/A

7. ___ Prior to the Commissioner's decision on the petition for an exemption, the applicant has complied with all restrictions on land disposal once the effective date for the waste has been reached - 376.1(f)(12).

IV. Waste Analysis and Recordkeeping - 376.1(g)[5]

A. Determination of Wastes Restricted from Land Disposal.

1. ___ Other than the wastes listed in 376.3(b)* or 376.4(d)**, the generator has determined if his F, K, P, U, or B listed wastes are restricted from land disposal - 376.1(g)(1). ✓

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 ✓

b. ___ Using knowledge of the wastes ✓

2. ___ Other than the wastes listed in 376.3(b)*, the generator has determined if his wastes exhibiting one or more characteristics (D001-D017) are restricted from land disposal - 376.1(g)(1). ✓

The determination is based on:

a. ___ Testing of extracts using the test method described in Appendix 20 (EP-tox), or ✓

b. ___ Using knowledge of the wastes. ✓

* Refer to ** on first page.

** Formerly the First, Second and Third Thirds

B. Restricted Wastes not Meeting Treatment Standards.[5]

___ 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). ✓

1. ___ EPA Hazardous Waste Number - 376.1(g)(1)(i)(a). ✓

2. ___ For wastes F001-F005, F039, and wastes prohibited in 376.3(b), the corresponding treatment standards - 376.1(g)(1)(i)(b). ✓

X Violation

X Satisfactory
NA Not Applicable

3. ___ For all other restricted wastes not included in 2. above: ✓

a. ___ The treatment standard, or ✓

b. ___ A reference on the notification, including: ✓

(1) ___ The applicable wastewater or nonwastewater category. ✓

(2) ___ The applicable waste specific criteria within a waste code. ✓

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

4. ___ For treatment standards expressed as specified technologies, the applicable five-letter treatment code - 376.1(g)(1)(i)(b). ✓

5. ___ The manifest number of the shipment - 376.1(g)(i)(c). ✓

6. ___ Waste analysis data - 376.1(g)(1)(i)(d). ✓

C. Restricted Wastes Meeting Treatment Standards.[5]

___ 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:

a. ___ EPA Hazardous Waste Number - 376.1(g)(1)(ii)(a)(1).

b. ___ For wastes F001-F005, F039, and wastes prohibited in 376.3(b), the corresponding treatment standards - 376.1(g)(1)(ii)(a)(2).

c. ___ For all other restricted wastes not included in b. above: - 376.1(g)(1)(ii)(a)(2).

(1) ___ The treatment standard, or

(2) ___ A reference, including:

(a) ___ The applicable wastewater or nonwastewater category.

X Violation

X Satisfactory
NA Not Applicable

(b) ___ The applicable waste specific criteria within a waste code. NA

(c) ___ The section(s) and paragraph(s) where the applicable treatment standard appears.

d. ___ For treatment standards expressed as specified technologies, the applicable five-letter treatment code - 376.1(g)(1)(ii)(a)(2).

e. ___ The manifest number for the shipment - 376.1(g)(1)(ii)(a)(3).

f. ___ Waste analysis data - 376.1(g)(1)(ii)(a)(4).

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

D. **Wastes Exempted from Land Disposal Prohibitions.**[5]

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

2. ___ The notice includes the following information.

a. ___ EPA Hazardous Waste number - 376.1(g)(1)(iii)(a).

b. ___ For wastes F001-F005, F039, and wastes prohibited in 376.3(b), the corresponding treatment standards - 376.1(g)(1)(iii)(b).

c. ___ For all other restricted wastes not included in b. above: - 376.1(g)(1)(iii)(b).

(1) ___ The treatment standard, or

(2) ___ A reference, including:

(a) ___ The applicable wastewater or nonwastewater category.

(b) ___ The applicable waste specific criteria within a waste code.

(c) ___ The section(s) and paragraph(s) where the applicable treatment standard appears.

X Violation

X Satisfactory
NA Not Applicable

d. ___ For treatment standards expressed as specified technologies, the applicable five-letter treatment code - 376.1(g)(1)(iii)(b). N/A

e. ___ The manifest number of the shipment - 376.1(g)(1)(iii)(c).

f. ___ Waste analysis date - 376.1(g)(1)(iii)(d).

g. ___ The date the waste is subject to the prohibitions - 376.1(g)(1)(iii)(e).

E. Treatment of Prohibited Wastes in Containers or Tanks.[1]

___ For generators managing a prohibited waste in tanks or containers regulated under Part 373-1 and treating that waste in those tanks or 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).

2. ___ Kept the plan on-site in the generator's records - 376.1(g)(1)(iv).

3. ___ The following requirements have been met:

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).

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).

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 IV.C.] ✓

F. Recordkeeping.[5]

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).

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). ✓

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,

   b. ___ That the waste is excluded from the definition of hazardous or solid waste or exempted from regulation, and

   c. ___ The disposition of the waste.

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). ✓

G. Alternate Treatment Standards for Lab Packs.[5]

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 IV.E.]

   b. ___ Made a waste determination in compliance with 376.1(g)(1)(v) & (vi). [Complete Items IV.F.1-3.]

   c. ___ Submitted the certification provided in 376.1(g)(1)(viii), signed by an authorized representative.

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 IV.B.]

b. ___ Made a waste determination in compliance with 376.1(g)(1)(v) & (vi). [Complete Items IV.F.1-3.]

c. ___ Submitted the certification provided in ~~376.1(g)(1)(ix), signed by an authorized representative.~~

H. Small Quantity Generators with Tolling Agreements.

___ For generators of less than 1,000 kg per calendar month and who do not store 1,000 kg or more at any time:

1. ___ The waste is reclaimed under a contractual agreement - 372.2(b)(7)(i).

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 IV.B-D. except for manifest requirements.]

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). ✓

I. Treatment Facility Requirements.[2]

1. ___ 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). [Complete Appendix A, Items 2. A-G.] ✓

2. ___ The treatment facility has specified the frequency of testing in its waste analysis plan - 376.1(g)(2). ✓

3. ___ The treatment facility has performed the testing as follows: ✓

a. ___ 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 ✓

X Violation

X Satisfactory
NA Not Applicable

using the test method described in Appendix 35 (TCLP), to assure that they meet the applicable treatment standards - 376.1(g)(2)(i).

b. ___ For wastes that are prohibited (376.3(b)), but not subject to any treatment standards, 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). ✓

c. ___ For wastes with treatment standards expressed as concentration 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). ✓

d. ___ The treatment facility has sent a notice with each waste shipment to the land disposal facility - 376.1(g)(2)(iv). ✓

e. ___ The notice contains the following information: - 376.1(g)(2)(iv). ✓

(1) ___ EPA Hazardous Waste Number - 376.1(g)(2)(iv)(a). ✓

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

(3) ___ For all other restricted wastes not included in (2) above: ✓

(a) ___ The treatment standard, or ✓

(b) ___ A reference on the notification, including: ✓

(i) ___ The applicable wastewater or nonwastewater category. ✓

(ii) ___ The applicable waste specific criteria within a waste code. ✓

(iii) ___ The section(s) and paragraph(s) where the applicable treatment standard appears. ✓

X Violation

X Satisfactory
NA Not Applicable

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

(5) ___ The manifest number of the shipment - 376.1(g)(2)(iv)(c). ✓

(6) ___ Waste analysis data - 376.1(g)(2)(iv)(d). ✓

f. ___ 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).

(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).

(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).

J. Restricted Wastes Shipped from Treatment or Storage Facilities to[2,3] Treatment, Storage, or Disposal Facilities.

___ 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). [Complete Items IV.B-D.] ✓

X Violation

X Satisfactory
NA Not Applicable

K. Recyclable Materials Used in a Manner Constituting Disposal - 376.1.(g)(2)(vii).

1. ___ 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* - 376.1(g)(2)(vii). [Complete Items IV.1.e.(1) - (4) and (6), and Items IV.1.f. (1) - (3).] N/A

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

2. ___ 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).

L. Requirements for Land Disposal Facilities.[4]

___ Except for the disposal of any waste that is a recyclable material used in a manner constituting disposal (374.3(a)(2)), the owner or operator of any land disposal facility disposing of any restricted wastes has: - 376.1(g)(3).

1. ___ 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.

2. ___ Specified the frequency of testing in its waste analysis plan.

3. ___ 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). [Complete Appendix A, Items 2. A-G.]

4. ___ Copies of the required notices and certifications. ✓

V. Special Rules Regarding Wastes that Exhibit a Characteristic[1**]

A. ___ The initial generator has identified each waste with all applicable waste codes provided in 371.4 (listed wastes) and 371.3 (characteristic wastes) - 376.1(h)(1). ✓

B. ___ For each hazardous waste, the initial generator has provided notification of all the treatment standards for any applicable listed and characteristic waste codes - 376.1(h)(2). ✓

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).

D. ___ For characteristic hazardous wastes that have been treated and are no longer hazardous, the initial generator or treatment facility 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** This section would also apply to any TSD that is the initial generator of the waste.

1. ___ The notification includes the following information: - 376.1(h)(4)(i).

a. ___ The name and address of the Part 360 facility receiving the waste - 376.1(h)(4)(i)(a).

b. ___ A description of the waste as initially generated, including the applicable EPA Hazardous Waste Number(s), the applicable wastewater or nonwastewater category, and the subdivisions made within each waste code based on waste-specific criteria - 376.1(h)(4)(i)(b).

c. ___ The treatment standards applicable to the waste at the initial point of generation - 376.1(h)(4)(i)(c).

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

VI. Prohibitions on Land Disposal[5]

A. Solvent/Dioxin Wastes.[5]

___ Unless the wastes meet the treatment standards of 376.4, persons have been granted an exemption from a prohibition pursuant to a petition, or persons have been granted an extension to the effective date of a prohibition, solvent wastes Nos. F001-F005 and dioxin wastes Nos. F020-F023 and F026-F028 (including contaminated soil and debris) are prohibited from land disposal - 376.3(a)(1). ✓

B. Prohibited Wastes Found in 376.3(b)(1).[5]

1. ___ The following wastes are prohibited from land disposal unless they comply with any of the conditions in 2. below: - 376.3(b)(1). ✓

X Violation

X Satisfactory
NA Not Applicable

a. ___ Liquid hazardous wastes containing PCB's at concentrations of equal to or greater than 50 ppm - 376.3(b)(1)(i). ✓

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). N/A

c. ___ Liquid hazardous wastes that contain over 134 mg/l nickel and/or 130 mg/l of thallium - 376.3(b)(1)(iii). ___

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). ___

b. ___ Persons have been granted an extension to the effective date of a prohibition, or - 376.3(b)(2)(ii). ___

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). ✓

3. ___ The wastes found in 1. above have been subjected to the Paint Filter Liquids Test to determine if they are liquids - 376.3(b)(3). ✓

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). ✓

C. **Prohibited Wastes Found in 376.3(c) [First, Second, and Third Third[5] Wastes].**

1. ___ The following wastes are prohibited from land disposal unless they meet any of the conditions of 2. below: - 376.3(c). ✓

a. ___ All hazardous wastes listed or identified in Parts 376 or 371 which have a disposal prohibition or treatment standard - 376.3(c)(1). ✓

X Violation

X Satisfactory
NA Not Applicable

b. ___ Effective 5/8/92, the hazardous wastes identified in Part 376.3(c)(2). ✓

c. ___ Effective 5/8/92, hazardous wastes that are mixed radioactive/hazardous wastes, and soil or debris contaminated with these wastes - 376.3(c)(3). ✓

d. ___ Effective 5/8/92, hazardous wastes having a treatment standard based on incineration, mercury retorting, and vitrification, acid leaching followed by chemical precipitation, or thermal recovery of metals, and which are contaminated soil or debris - 376.3(c)(4). ✓

2. ___ The wastes in 1. above may be land disposed provided that: 376.3(c)(6). N/A

a. ___ The wastes meet the applicable treatment standards, or - 376.3(c)(6)i).

b. ___ Persons have been granted an exemption from a prohibition, or - 376.3(c)(6)(ii).

c. ___ The wastes meet the applicable alternative standards established granted pursuant to a petition, or - 376.3(c)(6)(iii).

d. ___ Persons have been granted an extension to the effective date of a prohibition - 376.3(c)(6)(iv).

3. ___ 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 concentrations 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).

VII. Treatment Standards[5]

A. Applicability of Treatment Standards.[5]

1. ___ A restricted waste identified in 376.4(b) (Table CCWE] has been land disposed only when 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, K102, P010, P011, P012, P036, P038 and U136 - 376.4(a)(1). ✓

X Violation

X Satisfactory
NA Not Applicable

2. ___ The individual wastes listed in 1. above have been land disposed only when 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)] has been land disposed only after treatment using that technology or an equivalent treatment method approved by the EPA Administrator - 376.4(a)(2). ✓

B. Treatment Standards Expressed as Constituent Concentrations in Waste Extract.[5]

1. ___ Table CCWE identified 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 either TCLP or EP-Tox as specified in A.1. & 2 above for allowable land disposal* - 376.4(b)(1). ✓

* Compliance with these concentrations is required based upon grab samples.

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). ✓

C. Treatment Standards Expressed as Specified Technologies.[5]

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). ✓

* 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). ✓

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). ✓

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

X Violation

X Satisfactory
NA Not Applicable

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). ✓

** 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). NA

2. ___ An alternative treatment method approved by the EPA Administrator has been used in lieu of a standard established in Parts 376.4(c)(1), (3) and (4) - 376.4(c)(2). [Complete Items VII.C.1, 3 & 4.]

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).

a. ___ Lab packs comply with the applicable provisions of 373-2.14(l) and 373-3.14(i); 376.4(c)(3)(i).

b. ___ All hazardous wastes contained in lab packs are specified in Appendix 38 or 39 of this title; 376.4(c)(3)(ii).

c. ___ The lab packs are incinerated in accordance with the requirements of 373-2.15 and 373-3.15; 376.4(c)(3)(iii).

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).

X Violation

X Satisfactory
NA Not Applicable

D. Treatment Standards Expressed as Waste Concentrations.[5]

1. ___ Table CCW identifies 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). ✓

* Compliance with these concentrations is required based upon grab samples, unless otherwise noted in Table CCW.

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). ✓

3. ___ For organic constituents specified by footnote in Table CCW, the treatment and disposal facility has: - 376.4(d)(3). ✓

a. ___ Certified compliance with the treatment standards, and ✓

b. ___ Satisfactorily demonstrated the following conditions: ✓

(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). ✓

(2) ___ The organic constituents have been treated using the methods specified in (1) above - 376.4(d)(3)(i). ✓

(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). ✓

E. Variance From a Treatment Standard.[5]

1. ___ Each petition for a variance from a treatment standard has been submitted to the EPA Administrator in accordance with the procedures outlined in 40 CFR 260.20 - 376.4(e)(2). N/A

2. ___ Each petition includes the required certification - 376.4(e)(3). ↓

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).

5. ___ Applications for a site-specific variance must include the information in 40 CFR 260.20(b) - 376.4(e)(9).

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).

7. ___ During the application review process, the applicant has complied with all restrictions on land disposal - 376.4(e)(12). ✓

F. PCB Disposal.[5]

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). ✓

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). ✓

VIII. Prohibition on Storage of Restricted Wastes

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

1. ✓ 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). ___

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b. ✓ Complied with all storage requirements of 372, 373-1, 373-2, and 373-3. [Complete Inspection Report.] - 376.5(a)(1)(i). ___

c. ✓ Stored all restricted wastes for 90 days or less 376.5(a)(1)(i). ___

X Violation

X Satisfactory
NA Not Applicable

2. ✓ The owner or operator of a hazardous waste treatment, storage, or disposal facility has: ___

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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)(ii)(a). ✓

c. ___ Maintained in the operating record the contents and beginning accumulation date for each tank and container - 376.5(a)(1)(ii)(b). ✓

d. ___ Complied with all operating record requirements of 373-2.5(c) or 373-3.5(c) - 376.5(a)(1)(ii)(b). [Complete Appendix A Items 11.B.1-20.] - 376.5(a)(1)(ii)(b). ✓

3. ___ The transporter has stored manifested shipments of restricted wastes at a transfer facility for 5 days or less - 376.5(a)(1)(iii). N/A

4. ___ 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). ___

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). ___

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).

Attachment A

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
920930	2221	K	D007	15	DM	APTUS INC	KSD981506025	R	APTUS INC	NN004
920930	4391	K	D002	24	DM	APTUS INC	KSD981506025	R	APTUS INC	NN004
921001	1496	P	D001	10	DM	SAFETY-KLEEN CORP.	NYD980753784	R	SAFETY KLEEN CORPORATION	IL009
921001	1937	P	D001	23	DM	SAFETY-KLEEN CORP.	NYD980753784	R	SAFETY KLEEN CORPORATION	IL009
921001	36	P	D006	1	DM	SAFETY-KLEEN CORP.	NYD980753784	R	SAFETY KLEEN CORPORATION	IL009
921001	81	P	D001	3	DF	SAFETY-KLEEN CORP.	NYD980753784	R	SAFETY KLEEN CORPORATION	IL009
921008	21	P	D001	1	DF	LAIDLAW ENVIRONMENTAL SERVICES INC	NCD000648451	T	LAIDLAW ENVIRONMENTAL SERVICES (TG) INC	SC004
921008	22	P	D002	1	DF	LAIDLAW ENVIRONMENTAL SERVICES INC	NCD000648451	T	LAIDLAW ENVIRONMENTAL SERVICES (TG) INC	SC004
921008	21	P	D002	1	DF	LAIDLAW ENVIRONMENTAL SERVICES INC	NCD000648451	T	LAIDLAW ENVIRONMENTAL SERVICES (TG) INC	SC004
921008	27	P	D002	1	DF	LAIDLAW ENVIRONMENTAL SERVICES INC	NCD000648451	T	LAIDLAW ENVIRONMENTAL SERVICES (TG) INC	SC004
921008	19092	P	D001	31	DM	LAIDLAW ENVIRONMENTAL SERVICES INC	NCD000648451	R	LAIDLAW ENVIRONMENTAL SERVICES (TG) INC	SC004
921008	1044	P	D002	6	DM	LAIDLAW ENVIRONMENTAL SERVICES INC	NCD000648451	T	LAIDLAW ENVIRONMENTAL SERVICES (TG) INC	SC004
921008	25	P	D008	1	DF	LAIDLAW ENVIRONMENTAL SERVICES INC	NCD000648451	L	LAIDLAW ENVIRONMENTAL SERVICES (TG) INC	SC004
921008	12139	P	D008	26	DM	LAIDLAW ENVIRONMENTAL SERVICES INC	NCD000648451	L	LAIDLAW ENVIRONMENTAL SERVICES (TG) INC	SC004
921008	28	P	D002	1	DF	LAIDLAW ENVIRONMENTAL SERVICES INC	NCD000648451	T	LAIDLAW ENVIRONMENTAL SERVICES (TG) INC	SC004
921008	2322	P	D001	27	DM	SAFETY-KLEEN CORP.	NYD980753784	R	SAFETY KLEEN CORPORATION	IL009
921009	27400	P	D005	54	DM	ENVIRONMENTAL WASTE RESOURCES INC	CTD072138969	T	WEST CENTRAL ENVIRONMENTAL CORP	4A106
921009	904	P	D040	3	DM	ENVIRONMENTAL WASTE RESOURCES INC	CTD072138969	T	WEST CENTRAL ENVIRONMENTAL CORP	4A106
921019	397	P	D002	2	DM	LAIDLAW ENVIRONMENTAL SERVICES INC	NCD000648451	T	LAIDLAW ENVIRONMENTAL SERVICES (TG) INC	SC004
921019	354	P	F002	1	DM	LAIDLAW ENVIRONMENTAL SERVICES INC	NCD000648451	T	LAIDLAW ENVIRONMENTAL SERVICES (TG) INC	SC004
921013	561	P	D008	1	DM	LAIDLAW ENVIRONMENTAL SERVICES INC	NCD000648451	T	LAIDLAW ENVIRONMENTAL SERVICES (TG) INC	SC004
921019	67	P	F002	2	DM	LAIDLAW ENVIRONMENTAL SERVICES INC	NCD000648451	T	LAIDLAW ENVIRONMENTAL SERVICES (TG) INC	SC004
921029	609	P	D001	8	DM	SAFETY-KLEEN CORP.	NYD980753784	R	SAFETY KLEEN CORPORATION	IL009
921029	81	P	D001	3	DF	SAFETY-KLEEN CORP.	NYD980753784	R	SAFETY KLEEN CORPORATION	IL009
921029	36	P	D006	1	DM	SAFETY-KLEEN CORP.	NYD980753784	R	SAFETY KLEEN CORPORATION	IL009
921103	2400	P	D001	28	DM	SAFETY-KLEEN CORP.	NYD980753784	R	SAFETY KLEEN CORPORATION	IL009
921103	27	P	D001	1	DF	SAFETY-KLEEN CORP.	NYD980753784	R	SAFETY KLEEN CORPORATION	IL009
921119	2842	P	D001	34	DM	SAFETY-KLEEN CORP.	NYD980753784	R	SAFETY KLEEN CORPORATION	IL009
921119	36	P	D006	1	DM	SAFETY-KLEEN CORP.	NYD980753784	R	SAFETY KLEEN CORPORATION	IL009
921119	81	P	D001	3	DF	SAFETY-KLEEN CORP.	NYD980753784	R	SAFETY KLEEN CORPORATION	IL009
921124	647	P	D001	8	DM	SAFETY-KLEEN CORP.	NYD980753784	R	SAFETY KLEEN CORPORATION	IL009
921202	662	P	D008	1	DM	LAIDLAW ENVIRONMENTAL SERVICES INC	NCD000648451	T	ENVIRONMENTAL TRANS SERV INC	OK004
921202	2236	P	D001	26	DM	SAFETY-KLEEN CORP.	NYD980753784	R	SAFETY KLEEN CORPORATION	IL009
921215	1300	P	D001	17	DM	SAFETY-KLEEN CORP.	NYD980753784	R	SAFETY KLEEN CORPORATION	IL009
921215	36	P	D006	1	DM	SAFETY-KLEEN CORP.	NYD980753784	R	SAFETY KLEEN CORPORATION	IL009
921215	81	P	D001	3	DF	SAFETY-KLEEN CORP.	NYD980753784	R	SAFETY KLEEN CORPORATION	IL009
921215	2924	P	D001	34	DM	SAFETY-KLEEN CORP.	NYD980753784	R	SAFETY KLEEN CORPORATION	IL009
930120	374	G	D001	24	DM	SAFETY-KLEEN CORP.	NYD980753784	R	SAFETY KLEEN CORPORATION	IL009
930120	5	G	D006	1	DM	SAFETY-KLEEN CORP.	NYD980753784	R	SAFETY KLEEN CORPORATION	IL009
930120	12	G	D001	3	DF	SAFETY-KLEEN CORP.	NYD980753784	R	SAFETY KLEEN CORPORATION	IL009
930127	422	G	D001	26	DM	SAFETY-KLEEN CORP.	NYD980753784	R	SAFETY KLEEN CORPORATION	IL009
930127	4	G	D001	1	DF	SAFETY-KLEEN CORP.	NYD980753784	R	SAFETY KLEEN CORPORATION	IL009
930204	290	G	D001	18	DM	SAFETY-KLEEN CORP.	NYD980753784	R	SAFETY KLEEN CORPORATION	IL009
930217	114	G	D001	8	DM	SAFETY-KLEEN CORP.	NYD980753784	R	SAFETY KLEEN CORPORATION	IL009
930217	5	G	D006	1	DM	SAFETY-KLEEN CORP.	NYD980753784	R	SAFETY KLEEN CORPORATION	IL009
930217	12	G	D001	3	DF	SAFETY-KLEEN CORP.	NYD980753784	R	SAFETY KLEEN CORPORATION	IL009
930225	448	G	D001	28	DM	SAFETY-KLEEN CORP.	NYD980753784	R	SAFETY KLEEN CORPORATION	IL009
930317	364	P	D001	4	DM	LAIDLAW ENVIRONMENTAL SERVICES INC	NCD000648451	T	ENVIRONMENTAL TRANS SERV INC	OK004

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

930317	[illegible]	P	[illegible]	1	DR	LAIDLAW ENVIRONMENTAL SERVICES INC	NCD000648451	T	ENVIRONMENTAL TRANS SERV INC	OK004
930317	12	P	D002	1	DF	LAIDLAW ENVIRONMENTAL SERVICES INC	NCD000648451	T	ENVIRONMENTAL TRANS SERV INC	OK004
930317	565	P	D007	1	DR	LAIDLAW ENVIRONMENTAL SERVICES INC	NCD000648451	T	ENVIRONMENTAL TRANS SERV INC	OK004
930317	6	P	D003	1	DF	LAIDLAW ENVIRONMENTAL SERVICES INC	NCD000648451	T	ENVIRONMENTAL TRANS SERV INC	OK004
930317	455	P	F001	7	DR	LAIDLAW ENVIRONMENTAL SERVICES INC	NCD000648451	T	ENVIRONMENTAL TRANS SERV INC	OK004
930318	236	G	D001	16	DR	SAFETY-KLEEN CORP.	KYD980753784	R	SAFETY KLEEN CORPORATION	IL009
930318	5	G	D006	1	DR	SAFETY-KLEEN CORP.	KYD980753784	R	SAFETY KLEEN CORPORATION	IL009
930318	12	G	D001	3	DF	SAFETY-KLEEN CORP.	KYD980753784	R	SAFETY KLEEN CORPORATION	IL009
930318	413	G	D001	26	DR	SAFETY-KLEEN CORP.	KYD980753784	R	SAFETY KLEEN CORPORATION	IL009
930324	446	G	D001	27	DR	SAFETY-KLEEN CORP.	KYD980753784	R	SAFETY KLEEN CORPORATION	IL009
930414	77	G	D001	5	DR	SAFETY-KLEEN CORP.	KYD980753784	R	SAFETY KLEEN CORPORATION	IL009
930414	8	G	D001	2	DF	SAFETY-KLEEN CORP.	KYD980753784	R	SAFETY KLEEN CORPORATION	IL009
930422	473	G	D001	28	DR	SAFETY-KLEEN CORP.	KYD980753784	R	SAFETY CLEAN	20245
930422	4	G	D001	1	DF	SAFETY-KLEEN CORP.	KYD980753784	R	SAFETY CLEAN	20245
930427	237	G	D001	14	DR	SAFETY-KLEEN CORP.	KYD980753784	R	SAFETY KLEEN CORPORATION	IL009
930427	6	G	D006	1	DR	SAFETY-KLEEN CORP.	KYD980753784	R	SAFETY KLEEN CORPORATION	IL009
930427	4	G	D001	1	DF	SAFETY-KLEEN CORP.	KYD980753784	R	SAFETY KLEEN CORPORATION	IL009
930427	132	G	D001	8	DR	SAFETY-KLEEN CORP.	KYD980753784	R	SAFETY KLEEN CORPORATION	IL009
930511	158	G	D001	11	DR	SAFETY-KLEEN CORP.	KYD980753784	R	SAFETY KLEEN CORPORATION	IL009
930519	136	G	D001	8	DR	SAFETY-KLEEN CORP.	KYD980753784	R	SAFETY KLEEN CORPORATION	IL009
930609	115	G	D001	7	DR	SAFETY-KLEEN CORP.	KYD980753784	R	SAFETY-KLEEN CORP.	IL027
930616	134	G	D001	9	DR	SAFETY-KLEEN CORP.	KYD980753784	R	SAFETY KLEEN CORPORATION	IL009
930628	502	P	D008	1	DR	NORTHEAST ENVIRONMENTAL SERVICES	KYD045777145	L	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
930628	1774	P	D001	5	DR	NORTHEAST ENVIRONMENTAL SERVICES	KYD045777145	B	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
930628	520	P	D001	3	DR	NORTHEAST ENVIRONMENTAL SERVICES	KYD045777145	B	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
930628	548	P	D008	1	DR	NORTHEAST ENVIRONMENTAL SERVICES	KYD045777145	L	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
930628	135	P	D007	1	DR	NORTHEAST ENVIRONMENTAL SERVICES	KYD045777145	L	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
930628	654	P	D001	2	DR	NORTHEAST ENVIRONMENTAL SERVICES	KYD045777145	L	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
930628	150	P	U154	1	DR	NORTHEAST ENVIRONMENTAL SERVICES	KYD045777145	B	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
930628	152	P	D002	1	DR	NORTHEAST ENVIRONMENTAL SERVICES	KYD045777145	T	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
930628	10	P	D002	1	DF	NORTHEAST ENVIRONMENTAL SERVICES	KYD045777145	T	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
930628	14	P	U151	1	DF	NORTHEAST ENVIRONMENTAL SERVICES	KYD045777145	R	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
930707	554	P	D006	2	DR	NORTHEAST ENVIRONMENTAL SERVICES	KYD045777145	B	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
930707	4383	C	D007	24	DR	APTOS INC	ARD981190242	B	NORTHEAST ENVIRONMENTAL SERVICES INC	7A215
930707	144	G	D001	7	DR	SAFETY-KLEEN CORP.	KYD980753784	R	SAFETY KLEEN CORPORATION	IL009
930722	12	G	D001	3	DF	SAFETY-KLEEN CORP.	KYD980753784	R	SAFETY-KLEEN CORP.	IL027
930722	714	G	D001	42	DR	SAFETY-KLEEN CORP.	KYD980753784	R	SAFETY-KLEEN CORP.	IL027
930805	51	G	D001	3	DR	SAFETY-KLEEN CORP.	KYD980753784	R	SAFETY-KLEEN CORP.	IL027
930811	112	G	D001	7	DR	SAFETY-KLEEN CORP.	KYD980753784	R	SAFETY-KLEEN CORP.	IL027

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Attachment B

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	FREQUENCY OF ANALYSIS MINIMUM ANNUAL TESTS
MACHINE CLEANING WASTES									
Paper filters from paint spray booths (D001, D008, D007, D006)	10	ignitable, toxic	paper filters paint(dry) paint thinner Pb Cd Cr inert filler mat'l inert overpacking mat'l	1 to 10% 0 to 1% < 5 ppm 0 to 1 ppm 0 to 5 ppm 0 to 5 ppm 90 to 95% (of waste) 20% of drum	Pb,Cd,Cr	potentially ignitable; metals are a suspected contaminant	G,GT,S	9	1 (2)
Methylene chloride and stripped paint, absorbent, dirt, etc. (F002, D008, D007, D006) (Virgin mat'l is 75% methylene chloride, 10% methanol, and 15% inert)	15	ignitable, toxic	methylene chloride methanol oily solids paint solids inert mat'ls Pb Cd Cr	7 % 1 % 0 to 5% 10 to 20 % 53 to 68 % 0 to 5 ppm 0 to 1 ppm 0 to 5 ppm	Flash point; Fuel value Metals VOCs	potentially ignitable; may be recoverable	C,GT,R	1	1
Spent stoddard solvent (D001)	10	ignitable toxic	stoddard solvent (aliphatic hydrocarbons) contaminated with oil &grease and dirt	90 % 6 % 4 %	Flash point	potentially ignitable	C,GT,R	5	5
Still bottoms from recovery of 1,1,1 trichloroethane solvent (F001)	10	ignitable, toxic	liquid solvent; sludge,dirt, & grease sludge solvent; sludge,dirt, & grease paint chips, Pb, Cd, Cr	 90 % 10 % 10 % 90 %	% 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 (D008, D007, D006)	10	toxic	oil,grease solids water Pb Cd,Cr	20 % 75 % 5 % 5 to 40 ppm 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 (aliphatic hydrocarbons) oil,grease solids	80 to 90 % 10 % 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 nonrecoverable 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	FREQUENCY OF ANALYSIS MINIMUM ANNUAL TESTS
Paper wipes with spent toluene (F005)	3	ignitable; toxic	wipes 98 to 100 % toluene 0 to 1 % grease 0 to 1 % inert packing mat'l * 80 % (of drum) * waste was formerly overpacked in water to minimize ignitability hazard; presently packed in absorbent clay	(stored as ignitable)	potentially ignitable;	G,GT,R		1
Unidentified liquids found on post	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, Tl,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. off spec, excess, or expired shelf-life hazardous material (NOT MUNITIONS FOR INCINERATION) (old paint in cans, leaking drums, waste primer,expired stock, etc.)	10	variable	variable	variable	variable	variable	variable	variable
INCINERATED WASTES								
Dust collected from APE 1236 air pollution control devices (includes fused ash pieces and ash contaminated bags from baghouse)	10 (7)	TCLP Ba Pb corrosive (8)	ash residue 99.95 % Ba 300-400ppm Ag,Cr 0 to 5 ppm Cd 0 to 1 ppm Pb (9) 0 to 5 ppm	Ba,Pb Ag,Cd,Cr	known constituents; incinerated materials were reactive	T (or thief), G	1 1	1 1
Scrap metal (casings) and ash residue	(7)	TCLP	brass (10) steel ash residue heavy metal contaminants	Sb,As,Ba,Be,Cd, Cr,Co,Cu,Pb,Mn, Hg,Ni,Os,Se,Ag, Tl,V,Zn	determine mgmt. options (i.e. recycleable)		1	1

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	FREQUENCY OF ANALYSIS MINIMUM ANNUAL TESTS
Mixed nonrecoverable solvents (D001)	5	ignitable, toxic	solvents oil,grease solids* * wastes containing less than 10% solids residues expressed as 'solid' containing free liquids (if applicable)	75 to 85 % 10 to 15 % 5 to 10%	Flash point; Fuel value; VOCs	potentially ignitable; may be recoverable; known constituent/ personal protection	C,GT,R		
Cloth rags contaminated w/ solvents,clay absorbents (F001,F003,F005,D001)	100	ignitable, toxic	rags absorbent clay solvents	20 % 70 % 10 %	(stored as ignitable)	potentially ignitable;	G,GT,S	5	1 (3)
Still bottoms from 1,1,1 trichloroethane vapor degreasers (F001,D008, D007,D006)	10	toxic	TYPE I 1,1,1 trichloroethane solids oil,grease Pb,Cd,Cr TYPE II 1,1,1 trichloroethane solids oil,grease Pb,Cd,Cr	 80 % 10 % 10 % 20 % 20 % 60 %	% 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 (D008)	10	toxic	water oil solids (paint chips,dirt, etc.) detergent Pb	83-96 % 1 to 5 % 1 to 10 % 2 % 5 to 40 ppm	% Total solids; Pb	determine mgmt. options	G,GT,R	4	4
Waste cleaning compound (D001)	5	ignitable,	solvents (aliphatic HC) oil,grease solids*	75 to 85 % 10 to 15% 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 laquer	80 to 90 % 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 oil, grease, and dirt	10-20 % 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	FREQUENCY OF ANALYSIS MINIMUM ANNUAL TESTS
PCB WASTES								5	5 (5)
Waste PCB hydraulic fluid (B003)	5	toxic	> 500 ppm PCBs (100%)		PCBs	determine management practices	C,GT,R for liquids		
Waste PCB hydraulic fluid (B002)	1	toxic	between 50 and 500 ppm PCBs (100%)		PCBs	determine management practices	T,GT,R for solids		
PCB oil from transformers (B001)	3	toxic	between 50 and 500 ppm PCBs (100%)		PCBs	determine management practices	G,GT,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 overalls,plastic sheets absorbent clay solvent w/residual PCB contamination (B004,B005,B006,B007)	variable	toxic	cloth rags overalls,plastic sheets absorbent clay solvent w/residual PCB contamination	20 % 10 % 60 % 10 %	assumed >500 ppm PCBs	determine management practices			
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,GT,H G,GT,S	1	1
Paper wipes with spent acetone (F003)	3	ignitable; toxic	wipes acetone grease inert packing mat'l	98 to 100 % 0 to 1 % 0 to 1 % 80 % (of drum)	(stored as ignitable)	potentially ignitable;	G,GT,R	1*	1

* for both acetone and toluene wipes

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	FREQUENCY OF ANALYSIS MINIMUM ANNUAL TESTS
MIXED WASTES (11) (F001-F005, R001)									
Paper wipes contaminated with toluene and low level radioactive waste	1	radioactive, toxic	wipes toluene	98-100 % 0-1 %					
Paper wipes contaminated with acetone and low level radioactive waste	1	radioactive, toxic	wipes acetone	98-100 % 0-1 %					
Paper wipes contaminated with freon and low level radioactive waste	1	radioactive, toxic	wipes freon	98-100 % 0-1 %					
Paper wipes contaminated with isopropanol and low level radioactive waste	1	radioactive, toxic	wipes isopropanol	98-100 % 0-1 %					
Paper wipes contaminated with trichloroethylene and low level radioactive waste	1	radioactive, toxic	wipes trichloroethylene	98-100 % 0-1 %					

NOTES:

(1) Samples - C = Coliwasa
- T = Trier
- G = Grab

Container - GT = Glass, teflon lined lid
- P = Polyurethane

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 compatability, "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 unsaleable, it needs to be properly managed as a hazardous waste.

To: Chris Dunn
Elmer Ransom
301/907-3446
703 675-8550

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUL -7 1998

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: EPCRA Section 313 Reporting and the Treatment of Waste at Federal Facilities

FROM: Maria J. Doa, Chief MJD
Toxics Release Inventory Branch

TO: Adam Browning
Region IX

This memorandum responds to an EPCRA section 313 interpretive guidance question regarding activities at a Federal facility. The issue relates to the use of EPCRA section 313 chemicals, such as chlorine, to treat waste. A Department of Defense (DOD) facility has a waste treatment facility to treat the waste from the military personnel based at the facility. The question is whether the facility can claim the personal use exemption (40 CFR § 372.38 (c)(3)) for this activity.

EPA disagrees with the application of the personal use exemption in this situation. The definition of this exemption reads:

> Personal uses by employees or other persons at the facility of foods, drugs, cosmetics, or other personal items containing toxic chemicals, including supplies of such products within the facility such as in a facility operated cafeteria, store, or infirmary. (53 FR 4500; at 4528; February 16, 1988)

The intent is to cover small quantities of substances, which contain EPCRA section 313 chemicals, that are used by or for facility personnel. The materials do not support the operations of the facility. If the products are not owned by the personnel, their function is to provide amenities or assistance to employees. For this discussion, the second half of the definition, which addresses a "facility operated cafeteria, store or infirmary", is the relevant section. The Federal facility is claiming that its waste water treatment plant is similar to the concept of a cafeteria or infirmary and therefore exempt.

EPA established the personal use exemption to provide regulatory relief to industry. At the time, only the manufacturing sector was subject to EPCRA section 313. In addition to being ancillary to the operations of a facility, activities at facility cafeterias or stores were expected to be minor. EPA expected these activities to result in insignificant releases and transfers of EPCRA section 313 chemicals.

Activities at Federal facilities, however, typically are substantially different from the manufacturing sector. Ancillary activities at manufacturing facilities can be large-scale enterprises at Federal facilities. While an infirmary at a manufacturing facility typically is a single room, an infirmary at a DOD facility can be the size of a small hospital. The same logic applies to waste water treatment plants. If a manufacturing facility treats the waste generated by its employees, this activity is expected to be minor. A DOD facility, which can be the size of a small city, can have a stand alone waste water treatment plant. Application of the personal use exemption for a waste water treatment plant is beyond what EPA intended.

As stated, the personal use exemption covers only those activities that are not process-related. A cafeteria or store at a manufacturing facility is not integral to the operations of the facility. For DOD facilities, however, a central function is housing and supporting facility personnel. Training personnel is part of the process at a DOD facility. Operating a waste water treatment plant to service those personnel is process-related. The DOD facility should calculate the use of the TRI chemicals used at its waste water treatment facility towards its otherwise use threshold.

The DOD facility, like all Federal facilities, is subject to EPCRA section 313 reporting by Executive Order 12856. When making determinations about reporting releases and other waste management, it is important to remember the objective of this directive. The intent is to encourage Federal facilities to be proactive about reporting on the releases and other waste management of toxic chemicals. As the preamble states, "the Federal Government should be a good neighbor to local communities by becoming a leader in providing information to the public concerning toxic and hazardous chemicals...at Federal facilities."

If you have any questions on this matter, please feel free to contact John Harman of my staff. He can be reached by telephone at 202 260 6395, by email at "harman.john@epa.gov", or by fax at 202 401 8142. Thank you.

cc: IG Workgroup

New York State Department of Environmental Conservation
Division of Solid and Hazardous Materials, Region 8
6274 East Avon-Lima Road, Avon, New York 14414-9519
Phone: (716) 226-2466 FAX: (716) 226-2909

John P. Cahill
Commissioner

AAZ WASTE INSPECTION

File

November 17, 1998

Mr. Tom Grasek, Environmental Engineer
Seneca Army Deport
Route 96
Romulus, New York 14581

Dear Mr. Grasek:

RE: Hazardous Waste Compliance Inspection Date: 11/13/98
Location of Handler: Same as Above
EPA Identification No.: NY0213820830

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 II
Division of Solid & Hazardous Materials

MK:rp

Enclosure
cc: S. Carlomagno - NYSDEC, Albany
B. Knapp - NYSDEC, Albany
County Health Department

Attachment 2

BUILDING 307 INVENTORY LIST

DATE: 29 October 98

1. Nickel cadnium batteries, EPA # D006, Container # 1 Total 1.

2. Waste Gasoline, EPA # D001, Container # 2. Total 1.

3. Etching solution, EPA # D001/D002, Container # 3. Total 1.

4. Waste paint, EPA # D001, Containers #4, 5, 6, and 7. Total 4.

5. Acetone, EPA # D001, container # 8. Total 1.

6. ~~Lead contaminated debris, EPA # D008, container # 10. Total~~ 1.

Industrial Waste Non RCRA

1. Paint booth coating three containers.

Bldg. 301 PCB Empty

Bldg. 833 mixed waste Room Empty

Attachment 2

BUILDING 307 INVENTORY LIST

DATE: 29 October 98

1. Nickel cadnium batteries, EPA # D006, Container # 1 Total 1.

2. Waste Gasoline, EPA # D001, Container # 2. Total 1.

3. Etching solution, EPA # D001/D002, Container # 3. Total 1.

4. Waste paint, EPA # D001, Containers #4, 5, 6, and 7. Total 4.

5. Acetone, EPA # D001, container # 8. Total 1.

6. Lead contaminated debris, EPA # D008, container # 10. Total 1.

Industrial Waste Non RCRA

1. Paint booth coating three containers.

Bldg. 301 PCB Empty

Bldg. 803 mixed waste Room Empty

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APPENDICES

Appendix A ✓ Land Disposal Restrictions - SQG & Generator
Appendix B ✓ Land Disposal Restrictions - TSDF
Appendix C Permitted Facility Inspection
Appendix D Consent Order Follow-up Inspection
Appendix E Requirements for Tanks
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Appendix Q Groundwater Monitoring

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) 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:

TSD & LQG IN 8/18/80

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:

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 _____ (date) to _____ (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) X 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. Complete Part VII - 373-1.1(d)(1)(xv).

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.]

THE FACILITY IS EXPECTED TO TOTALLY SHUT DOWN IN 2001. HAZARDOUS WASTE IS GENERATED FROM MAINTENANCE AND CLEANUP ACTIVITIES.

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]:

NONE

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

BLDG. 301 PCB STORAGE ROOM EMPTY

BLDG. 803 MIXED WASTE ROOM EMPTY

BLDG. 307 SEE ATTACHMENT 2

(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:

N/A

(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) N/A 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) N/A 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) N/A 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 X Hazardous waste is transported by this company.

If Yes, Complete Part VII Permit No. N/A

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). 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

Indicate:	Indicate:
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:

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. 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 1

(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 1

(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) ___	Name of	X	X	___	X	X
(2) ___	EPA ID No. of	X	X	___	X	X
(3) ___	Mailing Address of	X			X	X
(4) ___	Telephone No. of	X	X	___	X	X
(5) ___	Manifest Document #					X
(6) ___	The proper USDOT description.					X

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

Indicate:		Indicate:
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

Indicate:		Indicate:
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

Indicate:		Indicate:
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

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:		Indicate:
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:		Indicate:	
X	Violations	X NA	Satisfactory 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: N/A

   (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 N/A

identity of the waste designated on the accompanying 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 — X 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). — X 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:		Indicate:
X	Violations	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:		Indicate:
X	Violations	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:		Indicate:
X	Violations	X Satisfactory NA Not Applicable
5. ___	Records and results of waste analyses and trial tests performed - 373-3.5(c)(2)(iii);	X
6. ___	Summary reports and details of all incidents that require implementing the contingency plan - 373-3.5(c)(2)(iv);	N/A
7. ___	Records and results of inspections as required by 373-3.2(f) - 373-3.5(c)(2)(v);	X
8. ___	Monitoring, testing or analytical data where required - 373-3.5(c)(2)(vi);	X
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);	X
10. ___	(For disposal facilities). All post-closure cost estimates - 373-3.5(c)(2)(vii);	N/A
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);	N/A
12. ___	Monitoring data required pursuant to a petition; 373-3.5(c)(2)(viii);	N/A
13. ___	The applicable notice required by a generator under 376.1(g), [waste analysis and recordkeeping] - 373-3.5(c)(2)(viii);	X
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);	X
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);	X
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);	X

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:		Indicate:	
X	Violations	X NA	Satisfactory 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:		Indicate:
X	Violations	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:		Indicate:
X	Violations	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/M. KHALIL

Inspection Date 11/13/1998

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).	___	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 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: 376.1(g)(1)(x) N/A

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 F001-F005 or any dioxin wastes F020-F023 and F026-F028 that are prohibited from land disposal? _X_ YES ___ NO

(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). _X_ 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 _X_ 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 _X_ 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 _X_ 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 _X_ 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 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 11/13/1998

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? [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.

_____

_____

A. ___ Treatment of the prohibited wastes occurs in the impoundments - 376.1(d)(1)(i). N/A

B. ___ The following conditions have been met: 376.1(d)(1)(ii). N/A

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). ___ X

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

X Violations

X Satisfactory
NA Not Applicable

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

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

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

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

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 _X_ 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. _X_ 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 _X_ NO

c. Liquid hazardous wastes that contain over 134 mg/l nickel and/or 130 mg/l of thallium. ___ YES _X_ 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 X NO

If yes list wastes and treatment method:

_____

_____

_____

_____

X Violations

X Satisfactory
NA Not Applicable

XII. Treatment Standards - 376.4

A. 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(l) 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

X Violations

X Satisfactory
NA Not Applicable

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 N/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

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). 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). 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 X

accumulation begins - 376.5(a)(1)(ii)(a).

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

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

Region/Inspector 8/MICHAEL KHALIL

Inspection Date 11/13/1998

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

DEPARTMENT OF THE ARMY
HEADQUARTERS, U.S. ARMY MATERIEL COMMAND
5001 EISENHOWER AVENUE, ALEXANDRIA, VA 22333 - 0001

REPLY TO ATTENTION OF

bx 460

S: 01 November 1993
S: 20 April 1994

AMCEN-A (200-1a) 30 June 1993

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Hazardous Waste Minimization/Pollution Prevention (HAZMIN/PP) Plan

1. Enclosed is the AMC HAZMIN/PP plan. This plan describes the actions AMC will take to reduce the volume and toxicity of the hazardous waste (HW) it produces. Pollution prevention and multimedia pollution reduction are also addressed in this plan.

2. Major Subordinate Commands (MSCs) are to prepare and submit their initial HAZMIN/PP plans, with specified documentation which incorporates the initial installation plans, to HQ AMC (Attn: AMCEN-A) by 1 November 1993. Revisions to MSC and installation HAZMIN/PP plans shall be submitted annually thereafter by 20 April.

3. This HAZMIN/PP plan varies significantly from the previous HAZMIN plans. The significant features of this HAZMIN/PP plan are as follows:

a. Calendar year 1993 (CY 93) is established as the new baseline year and sets a HW reduction goal of 25% by CY 97. Process goals and multimedia pollution reduction goals are also set.

b. Hazardous Material (HAZMAT) control is encouraged by intensive oversight management and through pollution prevention, to reduce or eliminate the generation of HW.

c. MSC reports, which incorporate installation reports, (Pollution Prevention Report, vice: Hazardous Waste Generation Report) are coordinated with the Army Compliance Tracking System version 1.1, and are due at HQ AMC (AMCEN-A) by 20 April 1994 and annually thereafter NLT 20 April.

d. MSCs are asked to identify DMWR/MILSPECs that are identified by their installations as impacting HAZMIN/PP.

e. Technology Transfer opportunities such as CTX, newsletters and the Lessons Learned Conference are identified.

f. MSCs are responsible for the tracking, collection and submission of their subordinate installation's plans and reports.

g. The HAZMIN/PP plan promotes close coordination of production/operations with environmental management staffs.

4. MSCs shall take actions to ensure that their installations are prepared to execute Superfund Amendments and Reauthorization Act (SARA) III/ Emergency Planning and Community Right to Know Act (EPCRA) Section 313 reports requirements.

5. The AMC point of contact is MAJ Jeff Dell'Omo, DSN 284-3890, or commercial 703-274-3890.

6. AMC -- America's Arsenal for the Brave.

Encl

JOHNNIE E. WILSON
Major General, USA
Chief of Staff

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Aberdeen Proving Ground, ATTN: STEAP-SH-E, Aberdeen Proving Ground, MD 21005
Anniston Army Depot, ATTN: SDSAN-DEL-EM, Anniston, AL 36205-5048
(CONT)

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SUBJECT: Hazardous Waste Minimization/Pollution Prevention (HAZMIN/PP) Plan

CF: (CONT)
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Milan Army Ammunition Plant, ATTN: SMCMI-EN, Milan, TN 38358-5000
Mississippi Army Ammunition Plant, ATTN: SMCMS-EN, Stennis Space Center, MS 39529-7000
Pine Bluff Arsenal, ATTN: SMCPB-EM, 10020 Kabrich Circle, Pine Bluff, AR 71602-9500
Radford Army Ammunition Plant, ATTN: SMCRA-EN, CALLER SERVICE 2, Radford, VA 24141-0298
Rock Island Arsenal, ATTN: SMCRI-ISF, Rock Island, IL 61299-5000
Scranton Army Ammunition Plant, ATTN: SMCSC-EN, 156 Cedar Avenue, Scranton, PA 18505-1138
Sunflower Army Ammunition Plant, ATTN: SMCSU-EV, P.O. Box 640, Desoto, KS 66018-0640
St. Louis Army Ammunition Plant, ATTN: SMCSL-COR, 4800 Goodfellow Blvd, St. Louis, MO 63120-1798
Stratford Army Engine Plant, ATTN: DCRB-KCP, c/o Commander, U.S. Army Aviation and Troop Command, 4800 Goodfellow Blvd, St. Louis, MO 63120-1798
(CONT)

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Vint Hill Farms, ATTN: SELVH-CO, Warrenton, VA 22186-5010
Fort Wingate Depot Activity, ATTN: SDSTE-FW-CO, c/o Commander, Tooele Army Depot, Tooele, UT 84074-5008
Letterkenny Army Depot, ATTN: SDSLE-EN, Chambersburg, PA 17201
Blue Grass Army Depot Activity, ATTN: SDSLB-IDE-E, Lexington, KY 40511
Pueblo Depot Activity, ATTN: SDSTE-PU-EE c/o Commander, Tooele Army Depot, Tooele, UT 84074-5008
Red River Army Depot, ATTN: SDSRR-WE, Texarkana, TX 75501-5000
Sacramento Army Depot, ATTN: SDSSA-EL-4, Sacramento, CA 95813-5052
Savanna Army Depot, ATTN: SDSLE-VA, Savanna, IL 61074-9636
Seneca Army Depot, ATTN: SDSSE-HE, Romulus, NY 14541-5001
Sierra Army Depot, ATTN: SDSSI-ENV, Herlong, CA 96113
Tobyhanna Army Depot, ATTN: SDSTO-EM, Tobyhanna, PA 18466-5081
Tooele Army Depot, ATTN: SDSTE-IRE, Tooele, UT 84074-5000
Umatilla Depot Activity, ATTN: SDSTE-UAI, c/o Commander, Tooele Army Depot, Tooele, UT 84074-5008
Watervliet Arsenal, ATTN: SMCWV-EHQ, Watervliet, NY 12189-4050
Redstone Arsenal, ATTN: DRSMI-RA-EH-MP, Redstone Arsenal, AL 35809
Detroit Arsenal Tank Plant, ATTN: DCMDM-TGEE, Van Dyke Road, Warren, MI 48397-5000
Detroit Arsenal, ATTN: AMSTA-XEM, Warren, MI 48397-5000
Lima Army Tank Plant, ATTN: AMSTA-CLPF, 1155 Buckeye Road, Lima, OH 45804-1898
Dugway Proving Ground, ATTN: STEDP-EPO, Dugway, UT 84022-5000
Jefferson Proving Ground, ATTN: STEJP-CT, Madison, IN 47250-5100
White Sands Missile Range, ATTN: STEWS-EL, White Sands, NM 88002-5076
Yuma Proving Ground, ATTN: STEYP-ES, Yuma, AZ 85365-9124
Natick RD&E Center, ATTN: STRNC-DF, Natick, MA 01760-5000
Belvoir RD&E Center, ATTN: STRBE-Q, Fort Belvoir, VA 22060-5606
U.S. Army Armament Research, Development and Engineering Center, ATTN: SMCAR-SEA (D), Picatinny Arsenal, NJ 07806-5000
U.S. Army Chemical Research, Development and Engineering Center, ATTN: SMCCR-CME (A), Aberdeen Proving Ground, MD 21010-5423

DIRECTOR
U.S. Army Edgewood Research Development and Engineering Center, ATTN: SCBRD-OD, Aberdeen Proving Ground, MD 21010-5423
(CONT)

AMCEN-A
SUBJECT: Hazardous Waste Minimization/Pollution Prevention (HAZMIN/PP) Plan

CF: (CONT)
Materials Technology Laboratory, ATTN: AMSRL-MA, Arsenal Street Watertown, MA 02172-0001

COMMANDER'S REPRESENTATIVE
Alabama Army Ammunition Plant, ATTN: SMCAL, 110 Highway No. 235, Childersburg, AL 35044-0368
Badger Army Ammunition Plant, ATTN: SMCBA-CR, Baraboo, WI 53913-5000
Cornhusker Army Ammunition Plant, ATTN: SMCCO, 102 N 60th Road, Rural Route #1, Box 396A Grand Island, NE 68803
Hays Army Ammunition Plant, ATTN: SMCHA-CA, c/o Scranton Army Ammunition Plant, Scranton, PA 18505-1138
Joliet Army Ammunition Plant, ATTN: SMCJO-EN, Joliet, IL 60436-5000
Newport Army Ammunition Plant, ATTN: SMCNE-EN, Newport, IN 47966-0121
Ravenna Army Ammunition Plant, ATTN: SMCRV, 8451 State Route 5, Ravenna, Oh 44266-9297
Riverbank Army Ammunition Plant, ATTN: SMCRE, Riverbank, CA 95367-0678
Twin Cities Army Ammunition Plant, ATTN: SMCTC-EV, New Brighton, MN 55112-5000
Volunteer Army Ammunition Plant, ATTN: SMCVO-CR, P.O. Box 22607, Chattanooga, TN 37422-2607

I&SA, ATTN: AMXEN-U
AMCRD-E
DCSAM
AMCLG-MM

ARMY MATERIEL COMMAND

HAZARDOUS WASTE MINIMIZATION/POLLUTION PREVENTION PLAN

(AMC HAZMIN/PP PLAN)

EXECUTIVE SUMMARY

The U.S. Army Materiel Command (AMC) procures, maintains, repairs, develops and produces the needed military material to ensure the American soldier is the best equipped in the world. As a results of its industrial and maintenance activities, AMC generates many tons per year of hazardous wastes (HW). This HW is released, as "pollution", to the air and water, and as solid waste. Public concern about the potential adverse health effects, or environmental damage, has resulted in the passage of numerous environmental regulations which impact AMC installations. These include the Resource Conservation and Recovery Act (RCRA), the Clean Water Act, the Clean Air Act and its amendments, the Pollution Prevention Act and the Federal Facilities Compliance Act. These acts require profound changes in the way the Army manages its HW and pollution releases, and practices pollution prevention. The AMC Hazardous Waste Minimization/Pollution Prevention (HAZMIN/PP) Plan describes the actions the Major Subordinate Commands (MSCs) and installations will take to reduce the volume and toxicity of their waste and pollutant releases, and the policy to be followed to minimize any threat from HW and multimedia pollution to our health and environment.

The AMC HAZMIN/PP Plan lists responsibilities for MSCs and their components. Because HW and pollution is generated, or impacted by the AMC support mission, the plan also provides for the HQ AMC Environmental Management Action Group (EMAG) to advocate and guide AMC HAZMIN/PP actions command-wide.

The AMC HAZMIN/PP goal is to eliminate all untreated releases by 1997. Specific HW and multimedia pollution reduction goals are listed by operation or process because it is the operation or process that must be changed to reduce the HW pollution quantity and toxicity.

Methods to reduce HW, and pollution prevention opportunities, are discussed at length in the plan. Hazardous material (HM) control is identified as the required means to minimize subsequent generation of HW and pollution. Opportunities where HAZMIN/PP methods can be applied are reviewed. HAZMIN/PP is identified as the most desirable management strategy in the production, fabrication or maintenance process (before or during generation) rather than treatment (after generation). Other opportunities, such as reducing storage time and increasing awareness of HAZMIN/PP in material acquisition and development are also discussed. It is significant to note that the new plan includes multimedia waste and is no longer limited to only the substances defined and regulated as HW.

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CHAPTER 1 - INTRODUCTION

1-1 PURPOSE. The purpose of this plan is to provide the information, guidance, and requirements necessary for AMC Major Subordinate Commands (MSCs) and installations to develop and execute a hazardous waste minimization/pollution prevention (HAZMIN/PP) program that is consistent with environmental regulations and requirements.

1-2 POLICY. The AMC HAZMIN/PP policy is to minimize, to the maximum extent economically feasible and practical, the volume and toxicity of the waste generated. Emphasis is on source reduction or elimination. Major thrusts will be eliminating the use of hazardous material (HM) through substitution, process change or modification, or reclamation/recycling. All AMC HAZMIN/PP programs will be consistent with the Department of the Army (DA) and Department of Defense (DoD) HAZMIN/PP policies.

1-3 APPLICABILITY. This plan applies to all MSCs, installations, and activities, as well as AMC government owned, contractor operated (GOCO) activities and facilities. Installations generating less than 1,200 kilograms per year of HW are exempt from the reporting requirements of this plan (this is the deminimus amount for EPA-RCRA manifesting).

1-4 BACKGROUND.

a. Hazardous Waste Minimization.

(1) AMC procures, maintains, repairs, develops and produces military materiel to ensure that the American soldier is the best equipped in the world. Its mission, and ancillary efforts, include many processes and operations which generate HW, such as spent solvents, sludges, unserviceable and obsolete munitions, painting, depainting, and electroplating wastes. As a result of AMC industrial and maintenance operations, AMC generates millions of kilograms of HW each year.

(2) The Commanding General (CG) has recognized the need to closely coordinate the Command's actions to reduce HW and multimedia pollution releases. The CG provides strong support to this vital program and has emphasized that elimination or reduction of HW generation is the most desirable method of management.

(3) AMC initiated an aggressive HAZMIN program in 1985 with the establishment of goals, collection of HW generation data and implementation of corrective/minimization actions. A HAZMIN summary for the years 1985-1989 was published in July 1991. The 1990 and 1991 Progress Reports were distributed in December 1991 and November of 1992 respectively. These reports contained both the annual generations of hazardous waste plus the past and

programmed corrective projects. The 1991 Progress Report documented the success of meeting the goal with a 65% reduction in industrial HW generation against the overall goal of a 50% reduction which was set in 1985 for CY 92!

(4) The number of Federal, State, and local regulations continue to increase and change. Included is the new Toxic Characteristic Leaching Procedure (TCLP) which has changed many wastes previously listed as non-hazardous to hazardous. MSCs and installations must make a conscious effort to keep appraised of the constantly changing rules and regulations.

(5) HQ AMC oversees the progress of the HAZMIN program through the Environmental Management Action Group (EMAG). Prior to 1992, when organized as the HQ HAZMIN Board, it was composed of personnel from the functional areas within AMC headquarters with invitations provided to the MSCs and other selected technical experts as required. Now, the group has been reorganized and expanded its area of oversight across the environmental field. Changes in responsibility and membership will be distributed to the field as they are approved.

b. Pollution Prevention.

(1) The U.S. EPA defines the term **pollution prevention** as, "The use of materials, processes or practices that reduce or eliminate the creation of pollutants or wastes at the source. It includes practices that reduce the use of hazardous materials, energy, water or other resources and practices that protect natural resources through conservation or more efficient use." Pollution prevention is a "multi-media" program that includes actions to reduce the impact of an operation or activity on the total environment (including air, surface water, ground water and soil) through the reduction or elimination of wastes, more efficient use of raw materials or energy, or reduced emissions of toxic materials. In the fall of 1990, the U.S. Congress passed the Pollution Prevention Act of 1990 which established a national policy that:

- Pollution should be prevented or reduced at the source whenever possible.
- Pollution that cannot be prevented should be recycled in an environmentally safe manner whenever possible.
- Pollution that cannot be prevented or recycled should be treated in an environmentally safe manner whenever feasible.
- Disposal or other release into the environment should be employed only as a last resort and should be conducted in an environmentally safe manner.

This EPA policy is shown graphically in Figure 1 below.

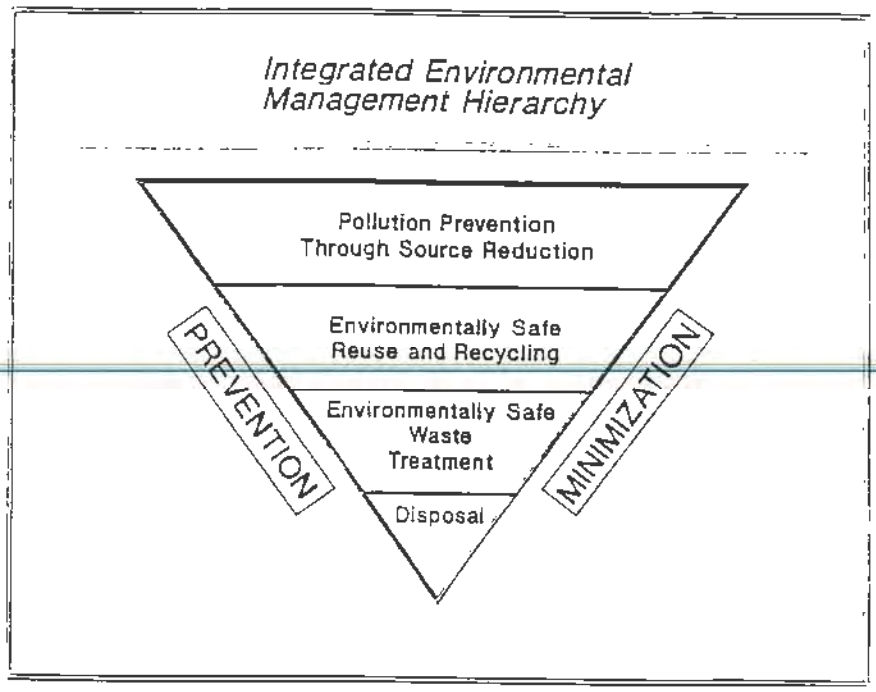


Figure 1. Pollution Prevention National Policy

(2) The Army Environmental Strategy into the 21st Century identifies pollution prevention (PP) as one of the four critical elements of the Army Environmental Management Program (along with compliance, restoration and conservation). Figure 2 on the following page illustrates this strategy. PP is a concept that will save dollars in a period of declining budgets while achieving environmental compliance. Future liability costs should be factored into any equations considering PP alternatives. Environmental laws and regulations are emphasizing PP to offset cross media effects and to establish holistic, integrated environmental programs.

(3) The Assistant Secretary of the Army (Installations, Logistics and Environment (ASA(I,L&E))) exercises oversight and approval over all aspects of the pollution prevention and waste minimization program, including policy development. This ensures consistency with total Environmental Management Program goals.

(4) The Headquarters Army Material Command (HQ AMC):

(a) Advises the Army Staff and Secretariat upon request.

(b) Accomplishes planning, programming, integration and execution of the industrial operation element of the pollution prevention RDT&E program.

(c) Coordinates with other Department of the Army and DoD organizations to provide detailed technical support to the MSCs and installations related to HAZMIN/PP.

(d) Identifies ways to reduce pollution and conducts HAZMIN/PP training.

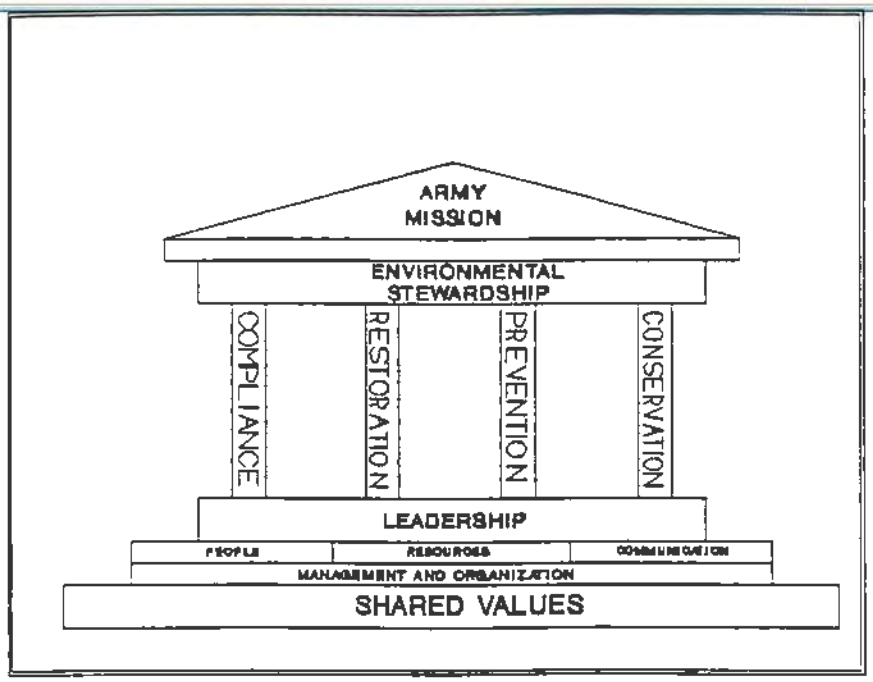


Figure 2. AMC Environmental Quality Programs

1-5 GOALS.

a. The AMC set two goals for the 1985-1992 HAZMIN program. The first goal was to reduce industrial HW generation 50% by 1992, compared to the 1985 regulated industrial HW generation levels. The second goal was to reduce the quantity of HW disposed of 50% by 1992 compared to 1985 HW disposal levels. AMC's HAZMIN policy emphasized reductions in source generations, through PP, as the preferred method to attain these goals.

b. Discussions were conducted with the Department of Defense and AMC to establish follow-on goals in HW generation, disposal and PP. 1993 will become the new baseline year for AMC with a 25% reduction in HW during CYs 1993-1997. This plan sets the goals and policies that the MSCs and installations shall follow.

1-6 UPDATES. The AMC HAZMIN/PP Plan, as well as each MSC and Installation HAZMIN/PP Plan, will be updated each calendar year and will reflect the progress and changes of the previous year. The revised MSC Plan and Installation Plans shall be submitted to HQ AMC (AMCEN-A) NLT 20 April of each year.

CHAPTER 2 - RESPONSIBILITIES

2-1 **HQ AMC** will:

a. Designate a Command HAZMIN/PP focal point. The Chief of Staff, AMC has been so designated.

b. Provide command policy and prioritization of HAZMIN and PP efforts.

c. Develop and promote HAZMIN/PP incentives.

d. Set command-wide HAZMIN reduction and multimedia PP goals.

e. Provide assistance to the MSCs and installations regarding HAZMIN/PP efforts.

f. Prepare and publish the annual AMC HAZMIN/PP Progress Report.

g. Revise and issue the AMC HAZMIN/PP Plan yearly or as required.

h. Promote development of a HW tracking system to monitor, receive, tabulate and summarize the information submitted by the MSCs and installations.

2-2 **HQ AMC ENVIRONMENTAL MANAGEMENT ACTION GROUP (EMAG)** will:

a. Provide oversight and guidance of the HAZMIN/PP program to the HQ staff and to the MSCs.

b. Participate in HAZMIN/PP technology transfer, and lessons learned distribution, within AMC as well as reporting information from the commercial sector.

c. Track HAZMIN/PP progress and report such progress.

2-3 **COMMANDERS OF MSCs** will:

a. Designate a Command HAZMIN/PP focal point at each MSC.

b. Prepare a MSC HAZMIN/PP Plan which includes their installation's HAZMIN/PP Plans as appendices. The initial plans are due at HQ AMC (Attn: AMCEN-A) NLT 1 November 1993. Yearly revisions are due at HQ AMC (AMCEN-A) NLT 20 April of each year.

c. Provide MSC-wide guidance and prioritization of HAZMIN/PP efforts consistent with this plan.

d. Set MSC-wide HAZMIN/PP goals consistent with AMC goals.

e. Execute the tracking system to monitor, receive, tabulate and summarize the information submitted by their installations in answer to the HW Generation/Multimedia Data Report data call.

f. Ensure that each subordinate installation's HAZMIN/PP Plans are consistent with the guidance in this initial plan and that revisions are forwarded to AMCEN-A NLT 20 April each year.

g. Participate in HAZMIN/PP technical transfer and lessons learned, with emphasis on technology and techniques used within the MSCs.

h. Report MSC-wide HAZMIN/PP status or progress in accordance with this plan or as directed by HQ AMC.

i. Program and budget funds for HAZMIN/PP initiatives.

j. Promote an incentive program in accordance with this plan which encourages maximum participation by their installations.

2-4 **COMMANDERS OF AMC INSTALLATIONS (INCLUDING GOCOs) AND ACTIVITIES** will:

a. Designate a Command HAZMIN/PP focal point at each installation.

b. Develop an annual Installation HAZMIN/PP Plan in accordance with guidance contained in this AMC plan and supplemental directives from their MSC.

c. Conduct routine on-site inspection of each HW generating facility and pollution sources. Maintain a current inventory of, and tracking system for, HW generating processes and pollution sources including the quantities of specific hazardous materials used, the HW generated, and the amount and type of pollution released.

d. Implement a hazardous material (HM) control program.

e. Recommend HAZMIN/PP technology or techniques to their MSC which they feel can be beneficially used elsewhere.

f. Report their HAZMIN/PP status or progress in accordance with this plan and as directed by their MSC commanders.

g. Implement HAZMIN/PP incentive programs in accordance with this plan and promote maximum participation.

h. Program and budget funds for HAZMIN/PP initiatives which include equipment, operational changes and RDT&E.

i. Implement Pollution Prevention Opportunity Assessments (PPOAs) with technical support, as appropriate, from AEC, AMCEN-A, their MSC, DESCOM/CTX, EPA and State Agencies.

2-5 **COMMANDER AMC INSTALLATIONS AND SERVICES ACTIVITY (I&SA)** will:

a. Designate a Command HAZMIN/PP focal point.

b. Provide technical assistance upon request to installations and activities regarding HAZMIN/PP efforts.

c. Perform technical review, upon request, of HAZMIN/PP maintenance and construction projects to ensure compliance with standards and benefit/cost considerations.

d. Review installation HAZMIN/PP programs to ensure compliance with the Environmental Compliance Assessment System (ECAS).

e. Maintain information about HAZMIN/PP technology and techniques in coordination with the Army Environmental Center (AEC), Armament Research, Development and Engineering Center (ARDEC) and Chemical Research, Development and Engineering Center (CRDEC).

CHAPTER 3 - HAZARDOUS WASTE MINIMIZATION/POLLUTION PREVENTION GOALS

3-1 PURPOSE.

a. AMC's HAZMIN policy emphasizes PP by reductions in source generations as the preferred method to attain the goals. As previously discussed (1-4.a.(3)) AMC has exceeded their previous goal with a 65.1% reduction in HW generation one year before the deadline.

b. Interim goals have been established by HQ AMC for specific industrial processes for the period CY 93 to CY 97. These goals are contained in Table 3-1. Reduction goals are listed by operation or process because the operation or process must be changed to reduce the quantity of HW generated. Note that in Table 3-1 many of the called for reductions exceed the 25% listed for the follow-on goals (1-5.b.). This is because some processes have not shown as much reduction as others and need additional attention and/or resources. Allowances can be made within process categories to permit flexibility as long as overall goals for the process or operation are met.

TABLE 3-1

AMC PROCESS GOALS FOR HW REDUCTIONS BY CY 1997

PROCESS, OPERATION OR CONDITION	PERCENT HW REDUCTION RELATED TO CY 1993
ELECTROPLATING	30
Etching Substances (acids)	
Dip Baths/Tanks	
Sludges	
Cyanide Wastes	
Rinsewater	
IWTP Regulated Releases	
DEPAINTING	25
Solvents	
Caustics	
Sludges	
Blast Media	
PAINTING	30
Paint Thinners	
Solvents	
Paint Wastes (slops)	
Heavy-Metal Based Paint	
Polyurethanes	
Sludges	
ELECTRICAL MAINTENANCE	15
PCB (Transformer Fluid if State Reg)	
Heavy Metals	

PROCESS, OPERATION OR CONDITION	PERCENT HW REDUCTION RELATED TO CY 1993
METAL WORKING	25
Cutting Oils	
Toxic Metals	
Coolants	
Quenching Oils	
Salt Baths	
Acids	
Bases	
Pickling Liquors	
Caustics	
Spent Cyanide Solvents	
Chromium Wastes	
Other Metal Wastes	
Metal Rinses	
LABORATORY OPERATIONS	40
Ignitable Solvents	
Chlorinated Solvents	
Chemicals (spent, used, expired)	
Contaminated Soils	
Calibration Fluids	
CLEAN/DEGREASE	30
Solvents (trichlor types)	
Solvents (Stoddard Type I)	
Detergents	
Ketones	
VEHICLE MAINTENANCE	30
Waste Oils/Slop	
Hydraulic Fluids	
Battery Acids	
Ethylene Glycols (coolants)	
Paint Wastes	
Solvents	
Fuel Wastes	
Tank Bottom Sediments	
Tank Cleaning Sludges	
Alkaline Battery Fluids	
Heavy Metals	
Wash Rack/Motor Pool Sludge	
Oils	
Lubricants	
Greases	
Alcohols	
Contaminated/Excess POL	

PROCESS, OPERATION OR CONDITION	PERCENT HW REDUCTION RELATED TO CY 1993
ENERGETICS MANUFACTURE & PRODUCTION	30
Load/Assembly/Pack Wastes	
Picric Acids	
Otto Fuels Waste	
Explosives Contaminated Solvents	
Rags	
Demill and Demill Residue	
Pink or Red Water from TNT	
Spent Carbon	
Waste Water Treatment Sludges	
Sodium Sellite	
OB/OD Residues	
Contaminated Soils	
OTHER	30
Art/Photo/X-ray - ink, data processing fluid, perchlor, acids, cyanide, caustics, silver, heavy metals, solvents, used oil, sludges	
Pesticides - rinsed containers, wastes	
Misc. Aircraft Repair - brake lining waste, stress and defect analysis waste, welding waste	
Cooling Towers - bleed off wastes, feedwater chems.	
Boiler Operations - blowdown wastes	
Disaster Preparedness - decontaminating fluids	
Firework Training - aqueous film forming foam	

c. Goals are based on switching the emphasis from waste generation to waste reduction. Goal-waste would be tracked waste with fate codes "D" (Ultimate disposal off-site, not through DRMO) and, "E" (Ultimate disposal off-site through DMRO) (See Appendix A). This would allow installations to get credit for recycling programs that were not credited in the past. The overall objective of the HAZMIN/PP environmental program is to protect the environment and human health. Although not the preferred method of pollution prevention, recycling accomplishes this by not releasing the waste.

3-2 POLLUTION PREVENTION OPPORTUNITIES.

The majority of successful PP programs are evolutionary not revolutionary. Since PP requires a holistic approach, and new concepts, it offers many opportunities to look at what were single media approaches to reduce or eliminate pollution. The holistic approach to PP requires that energy and water usage be considered as important inputs (if applicable) to the systems and

processes of concern. Examples of applying PP program concepts to solve single media problems are shown below:

a. Water Pollution/Waste Water Reduction. For years, installations have used streams of water to clean surfaces covered with grease, oil, sludge, or to wash down fuel spills. The water stream, and the contaminant removed, became a waste to be treated in the installation's industrial waste treatment plant (IWTP). A few pounds of waste resulted in causing several hundreds, or thousands, of gallons of water to become polluted. Any system which would remove the undesirable material from the surface, without contaminating such a large quantity of water, could be considered as a PP alternative even though it might create a cross media problem, such as:

(1) A solid waste problem if a solid blasting material were used to remove the contaminant.

(2) An air pollution problem if a solvent were used as a spray or in a dipping tank.

(3) A greatly reduced water pollution problem if high temperature, high pressure water was used for the spray, then passed through a oil/water separator, and then collected and recirculated through the system.

b. Process Water. Waste water from an industrial process can be an expensive luxury. At many installations, process water is taken from a common water system which distributes treated, potable water. The waste process water is then treated at the IWTP after it has been used in the specific process. PP should be the first consideration when planning any water using process. Examples of such processes are:

(1) Using spray rinsing, with recirculated water, instead of dip rinsing at hard chrome plating facilities.

(2) Use drip collection systems at hard chrome plating facilities so that the small quantities of contaminated process waste are collected at the source rather than passing through the floor drain system.

c. Potable Water. Water conservation should be practiced, just as energy conservation. The PP tie-in is that potable water must be treated and pumped before it can be used, and again before it can be discharged to the environment. This is an expensive and energy intensive process.

(1) Leaky water supply systems should be repaired or replaced.

(2) "Water savers" should be installed in showers, faucets and toilets.

(3) Potable water should not be used for irrigation (lawn and garden watering) if alternate sources of suitable water are available (wells, ponds, streams etc.).

d. Solid Waste. Solid waste can be disposed of in several ways, most of which can comply with all laws and regulations if the waste is of the approved category for the disposal system used. The total cost of all segments of the waste disposal system must be factored into the equation for comparison with the costs of alternate, PP, systems.

(1) The cost of disposal of solid waste is a function of the quantity handled. A plan which reduces waste mass, or volume, by 50% can be expected to reduce the cost of disposal by approximately the same amount. Recycling should be considered as an alternate pollution prevention measure.

(2) A system of solid waste segregation may be the preferred alternative. Combustible refuse can go to an approved incinerator (which may be part of a waste-to-energy system). Hazardous waste (such as building demolition debris painted with lead based paint) must go to a HW treatment facility at a very high cost. The remainder of the non-hazardous demolition waste can go to a municipal landfill, or demolition debris landfill, at a fraction of the cost charged by the HW treatment facility.

(3) Local purchases of small quantities, rather than bulk purchases, and monitoring of material shelf life are other examples of PP. Again, when these systems are analyzed from the cost standpoint, all costs must be considered.

e. Air Pollution. The Clean Air Act Amendments of 1990 (CAAA 90) put tremendous constraints on facilities with air emissions, or potential air emissions. Audits or emission inventories are required. These may then be used by the facility as a basis to analyze PP alternatives to benefit the facility. Examples included:

(1) Conversion of the installation heating system to high efficiency, gas-fired unit heaters. This would be classed as a move toward a clean fuel and it could allow a separation from an outdated central heating plant or a leaky steam distribution system. If the cost of meeting the CAAA90 are factored into the total costs (including the cost of future liability) a favorable payout period may become apparent.

(2) The listing of over 150 "Hazardous Air Pollutants" in CAAA 90 should be considered as a starting point to determine if PP is a viable option for a process or system. The EPA Administrator must promulgate regulations covering emission standards for the Hazardous Air Pollutants. The first two alternatives, listed in CAAA 90, are: "(A) Reduce the volume or eliminate emissions of such pollutants through process changes, substitution of materials or other modifications," and "(B) Enclose systems or processes to eliminate emissions." (PUBLIC LAW 101-549-NOV. 15, 1990, 104 STAT. 2539, (d) Emission Standards)

(3) Voluntary PP programs that significantly reduce air pollutant emissions will be recognized by EPA and the states. This can reduce, or even eliminate, permit fees, facility inspections, required record keeping and reporting, required atmospheric modeling and monitoring, and the possibility of Notices of Violation (NOVs).

f. Chlorofluorocarbons/Hydrochlorofluorocarbons/Ozone Depleting Chemicals (CFC/HCFC/ODC). Because CFC/ODCs will be phased out by 1 December 1995, changes must be made to facilities currently using these chemicals. This includes changes in refrigeration, air conditioning and chilling systems, and processes using Freon as a solvent and for fire suppression and explosion prevention systems. HCFCs will be phased out by CY 2000 and similar plans must be made concerning processes using HCFCs. PP definitely is the method of choice to reduce dependency on these chemicals. Elimination of, or substitution for, these chemicals is therefore one of the PP goals.

3-3 REDUCTION GOALS FOR POLLUTION PREVENTION. Table 3-2 lists the amount of reduction to meet the AMC PP goals for CY 93 to CY 97. If all the reductions for PP goals were the same as the HAZMIN goals (1-5.b.), the values in Table 3-2 would all be 25% and there would be no need for the Table. Process Water goals are only 10% because most of the reductions have been made. CFC/ODC goals are 100% because CFCs and ODCs are being rapidly phased out and probably will not be available after CY 1997 (3-2.f.). A Hazardous waste, reduced or minimized through PP, can be credited to the Table 3-1, AMC PROCESS GOALS and **also** to the Table 3-2, AMC POLLUTION PREVENTION GOALS CY 93 to CY 97.

Table 3-2

AMC POLLUTION PREVENTION GOALS FOR REDUCTIONS BY CY 1997

POLLUTION PROGRAM OF CONCERN	PERCENT REDUCTION RELATED TO CY 1993, %
Water Pollution/Waste Water Reduction	25
Process Water	10
Potable Water	To Be Determined (Based on Energy Act of 1992)
Solid Waste	25
Air Pollution	25
CFC/ODC	100
HCFC	25

CHAPTER 4 - PRINCIPAL ELEMENTS OF HAZARDOUS WASTE/HAZARDOUS MATERIAL MINIMIZATION

4-1 METHODS OF REDUCTION.

a. HAZMIN.

(1) Hazardous Material (HM) Control. Intensive management and reductions in the use of HMs (not wastes) is the preferred way to reduce the generation of HW. Management of hazardous materials requires the efforts of many directorates and offices on any installation, such as supply, transportation, logistics, and maintenance. All installations shall implement a hazardous material control program. The intent of this program shall be to assure that only those hazardous materials, in the proper amounts and at the needed times, that are required for each specific process are procured. This would prevent requisitioning HMs that are not absolutely necessary. It would also reduce the quantities of HMs that become wastes due to shelf life expirations.

(2) HM Tracking. An automated tracking system is being developed by the Defense Environmental Corporate Information Management (DECIM) Program Office to facilitate the monitoring and tracking of HM and HW over their life-cycle on an installation. This system should be available by FY 94.

(3) Procurement. Procurement or acquisition specifications frequently do not specify material composition based on a hazardous/non-hazardous classification. HM control can be accomplished by specifying, wherever possible, the use of a non-hazardous material or compound. At a minimum, the use of a less hazardous material should be considered. Chapter 9, DMWR/MILSPEC, covers this subject in greater depth.

(4) Delisting. It is obvious that a non-hazardous waste should not be reported as hazardous. EPA specifies waste streams from many types of industrial processes as hazardous waste based on the generic and historic characteristics of the process. AMC's actual wastes may differ significantly from the "typical" waste streams referenced by the EPA. The EPA regulations allow for petitioning to delist the waste. It must be noted that the burden of proof is on the petitioner who would also be responsible for all necessary analytical testing to support their claim. To be successful the petitioner must demonstrate that the waste does not meet any of the criteria for which it was listed as a HW. Regulatory authorities may consider additional factors, other than those for which the waste was initially listed as a HW. Details are found in 40 CFR 260.22.

(5) Material substitution. As stated, the optimum solution is to replace a HM with a non-hazardous material that performs to the same specification. It may be applicable to replace the HM with one that is less hazardous or easier to treat. An example is substituting a biodegradable citric based solvent for a hydrocarbon based solvent. Material substitution is perhaps the most expedient method of reducing HW if a suitable substitute can be found.

(6) Process change. This refers to process modifications that get the job done but produce less or no HW. Paint stripping by plastic media blasting, instead of using solvents, produces much less HW volume, plus less toxic and more manageable wastes. Filtration of plating baths reduces the frequency of bath dumps, thus reducing the volume of contaminated waste water over time. These measures are already being taken at many AMC installations and are only two of many examples that can be cited. It is significant to note that process changes which are successful do more than simply reduce the volume or toxicity of HW. They have historically improved the production rate and quality, reduced overall operation costs, and decreased manpower requirements. Process change also includes inexpensive and straight-forward

changes such as segregation and concentration of HW to preclude formation of complex, difficult-to-treat mixtures, and to prevent intermixing with nonhazardous wastes.

(7) Recycle/reuse/resale. The ultimate purpose here is to eliminate the disposal of any recyclable/reusable material. This would include on-site regeneration of waste solvents, using spent or contaminated solvents by mixing with fuel in boiler plants, or reclaiming valuable material for sale. There are industrial material exchange services that act as facilitators and publish, without charge, lists of potentially marketable material from one industry to other interested industries. Such exchange services should be considered if the HW or HM are not managed by the Defense Reutilization and Marketing Service (DRMS).

(8) Treatment. If all of the previous actions have been considered and the process still generates HW (although significantly reduced), treatment may be required to meet AMC's commitment to protect human health and the environment, and, to comply with laws and regulations. Treatment can include, but is not limited to, neutralization, solidification, volume reduction, or biological detoxification. Wastes, such as acids and bases, can be neutralized. Heavy metal sludges can be bound in a non-leachable matrix and disposed of as solid (nonhazardous) waste.

(9) Destruction. In this plan, destruction is actually a sub-set of treatment but is applied to the destruction and demilitarization of propellants, explosives, and pyrotechnics (PEP). This is a requirement at many of the AMC installations. This destruction is typically accomplished through open burning/open detonation (OB/OD), incineration, and thermal treatment. These operations are receiving attention from the regulatory agencies due to the visible air emissions as well as the hazardous residue often left on the burning/detonation pad.

4-2 OPPORTUNITIES FOR REDUCTION.

a. Administrative Reporting. This plan applies only to those materials and wastes defined under RCRA or State equivalent regulations. The only exception to this applies to used oil. The inclusion of used oil is an AMC decision based on the future possibility that it may be regulated by RCRA.

b. HWs that are specified by EPA, or State equivalent regulations, or that otherwise meet the criteria contained in Subpart C, 40 CFR 261 will be turned in to the DRMO for disposal. HM, however, **should not** be classified as HW when turned in to the DRMO unless otherwise directed by that office. The DRMO will attempt to reutilize, transfer, donate, or sell this material. If it cannot be disposed of in this way, the DRMO will then classify it as a HW. Only then should it be managed under RCRA regulations and inventoried as HW.

c. Require direct vendor delivery of HM shelf-life items such as chemicals. This practice reduces storage time and the possibility that such materials remain unused and become wastes because their expiration date has passed.

4-3 TECHNOLOGY TRANSFER.

a. Centers of Technical Excellence (CTX). The DESCOM has established six CTX installations. Each CTX has the responsibility to concentrate their HAZMIN efforts on a specific process. These 10 processes are: chemical paint stripping; painting waste; metal plating wastes; petroleum degreasing solvents; waste treatment plant hazardous sludges; aluminum conversion coating; chlorinated solvents; chlorofluorocarbons; halons; and blast dust residues. The results of these efforts are provided through the annual Lessons Learned Workshop and other media throughout the year.

b. Annual Environmental Lessons Learned Workshop. This workshop is hosted by AMC and is intended to bring the principals from AMC Headquarters, MSCs, installations and supporting technical agencies together for detailed and interactive transfer of problems, solutions and other lessons learned. HAZMIN/PP will be major issues at these workshops. It is the intent of AMC that this annual meeting will be supplemented through the use of video conferences. The dates and locations for these workshops will be announced by HQ AMC.

c. Joint Depot Environmental Panel (JDEP). This is a joint service body responsible for overseeing the environmental programs at the respective service's maintenance activities. The JDEP provides the forum for transfer of ideas, technologies, and successes between services.

d. Joint Ordnance Commanders Group (JOCG). This is a joint service body concentrating on environmental issues relating to the production, treatment, and disposal of energetic material. The JOCG provides the forum for transfer of technologies and lessons learned in the munitions's area.

e. HAZMIN Board Technology Transfer Working Group. This working group, of the Environmental Management Action Group (EMAG), is tasked to enhance technology transfer and distribution of lessons learned throughout the command. A Lessons Learned Notebook summarizes the many R&D efforts completed as well as HAZMIN projects that have been implemented at the installations. This notebook provides the MSCs and installations with data on cost, effectiveness, degree of HW minimization, and any process specific guidance. This notebook will be updated periodically.

f. Worker-identified changes may result in low cost reduction of HW generation. The previously listed groups and meetings are not the total answer to technology transfer/lessons learned. MSCs and Installations should actively solicit ideas and solutions from the production people "on the lines."

CHAPTER 5 - MSC HAZARDOUS WASTE MINIMIZATION/POLLUTION PREVENTION PLAN

5-1 GENERAL. Each MSC has individual, unique functions so each needs to adapt this AMC HAZMIN/PP Plan to their own specific Command. The MSC Plan shall emphasize the oversight and action functions that the MSC will direct toward its installations. The MSC Plan shall be compatible with this AMC Plan. The MSC Plan should be adaptable to any future HAZMIN/PP Plans or HM/PP/HW Plans that may be instituted by the Army Environmental Center (AEC) or the Office of the Deputy Undersecretary of Defense for Environmental Security (DUSD(ES)). The initial copy of the MSC Plan is due at HQ AMCEN-A by 1 November 1993. Subsequent copies of the MSC Plan are due at HQ AMCEN-A by 20 April of each year thereafter.

5-2 FUNCTION.

a. The MSC Plan shall provide the guidance and oversight to direct its installations toward acceptable HAZMIN/PP.

b. The MSC Plan shall be an action plan with a viable tracking system built in.

c. The MSC Plan shall promote the other AEC "pillars": compliance, restoration and conservation.

5-3 REPORTING.

a. The updated MSC and installation plans will be forwarded to HQ AMCEN-A, along with the tabulated information from their installation's HW Generation/Multimedia Data Report, NLT 20 April.

b. Narrative information, received from the installations, that would benefit other MSCs and installations should be forwarded to HQ AMCEN-A as it is received and reviewed.

CHAPTER 6 - INSTALLATION HAZARDOUS WASTE MINIMIZATION/ POLLUTION PREVENTION PLAN AND REPORT

6-1 GENERAL.

a. Each installation shall have an Installation HAZMIN/ PP Plan which provides a specific plan of action to reduce the quantity and toxicity of HW generated at the installation. This plan will be a part of the Installation Hazardous Waste Management Plan as prescribed and discussed in AR 420-47 and AR 200-1. The plan must be designed to satisfy the Federal EPA, or state equivalent, requirements for HAZMIN as well as the specific requirements contained in this AMC Plan and the subsequent MSC Plan. The Installation HAZMIN/PP Plan is an important document and will be used to implement a proactive, forward looking HAZMIN/PP program. It will be updated as required but not less than annually. The annual plan will be forwarded to the MSC, along with the required Hazardous Waste Generation/PP/Multimedia Data Report, by the deadline date set by the MSC.

b. Installation HAZMIN/PP Plans will follow the standard format prescribed below.

6-2 INSTALLATION HAZMIN/POLLUTION PREVENTION PLAN FORMAT.

a. Purpose. The purpose of the Installation HAZMIN/PP Plan is to provide a specific plan of action to reduce the generation of HW and pollution releases at the specific installation.

b. Scope. The plan shall cover all HW regulated under RCRA (or state equivalent legislation) which is generated, and the multimedia pollution releases, at the installation. The plan will also cover used oils not destined for recycling.

c. Background. This section will be used to briefly discuss the history and mission of the specific installation. An overview of industrial operations, processes, major hazardous wastes generated, treatment systems and multimedia pollution release sources shall be provided. Any changes that have occurred in the installations mission or workload since the last report shall be stated and discussed in this paragraph.

d. Goals. The overall installation HAZMIN goal must at least meet the AMC HAZMIN goal; a 25% reduction of HW by CY 1997 using CY 1993 rates as a baseline. Specific process reduction goals shall be at least equal to those in this plan (Table 3-1). PP goals shall be at least equal to those in this plan (Table 3-2). The projected ability of the installation to meet the 1997 goal of a 25% reduction shall be discussed. If it is anticipated that an installation will not achieve these goals, provide an explanation and state any near term assistance that could promote the HW generation/reduction.

e. Program management. The HAZMIN Program will be managed in accordance with AR 420-47, AR 200-1, and this Plan. This section of the plan will list the membership of the Installation Hazardous Waste Management Board. State the number of personnel actively involved in HAZMIN activities, and cross reference the Installation Hazardous Waste Management Plan.

f. Training. This paragraph will outline classroom instruction and on-the-job training provided or planned for all individuals involved in the handling or management of HM and HW as required by Army, Federal or state HW management regulations. 40 CFR 264.16 gives Federal EPA requirements and a useful training program outline. A pollution prevention training program shall be developed for all personnel. If a formal training plan has been separately developed for the installation, it should be referenced in the HAZMIN/PP Plan.

g. Process inventory. This paragraph shall contain an updated industrial process/operation inventory of all processes/operations that use HM and/or generate HW, and all multimedia pollution release sources. At a minimum, the inventory shall contain: process/operation name, facility DODAAC code, building number, specific process/operation identification code (installation generated), and type of HM in the process/operation. This section will also emphasize those wastes that have been recently characterized as hazardous(by process) due to either new State requirements or the TCLP.

h. HAZMIN/PP Actions.

(1) General. The HAZMIN/PP Actions portion of the Plan is of major importance. This summary of projects/actions initiated or planned by installations is used by both AMC and the MSC to compile lessons learned for potential Army wide application. It must be stressed that "negative" results are also important to document. This documentation prevents other installations from expending resources or duplicating efforts that have already been tried and found unsatisfactory.

(2) Past HAZMIN/PP projects. The status of past HAZMIN/PP projects and initiatives shall be discussed. Each initiative/project will be briefly described to include actual implementation costs, funding sources, HW and pollution release reductions realized, cost savings/cost avoidance, and any difficulties that may impact continued operations. If reductions were less than expected/projected, a brief explanation with planned corrective actions or changes shall be provided. All initiatives/projects, investigations, or implementations since 1993 shall be included. This detailed narrative is only required for a projects first inclusion in the HAZMIN Plan. All future plans need only list the HAZMIN/PP project and the year it was

implemented/included in the first HAZMIN/PP Plan. Any additional updates on previous projects may be included by the installations.

(3) Current HAZMIN/PP Projects. This section describes ongoing and funded HAZMIN/PP projects. Subject areas may cover descriptions, implementation schedules, milestones and status reports. The HW pollution release reduction expected from the project should be discussed. Cost and/or manpower impacts should be noted.

(4) Future HAZMIN/PP Projects. This section contains projects or actions that are envisioned for future implementation or evaluation. It will contain a short description of the project, estimated cost, an installation/MSC priority ranking, and the projected implementation date. Benefit/costs should be emphasized and the expected HW and pollution reduction discussed. State if these projects have been submitted on a 1383 project exhibit.

6-3 HAZMIN GENERATION/PP REPORT. The HAZMIN Generation/PP Report is formatted by the Installation's HAZMIN/ PP Plan and is the summation of the data for the year's generations. These data are used throughout AMC, and higher headquarters, to review and monitor the HAZMIN/PP program in its effectiveness toward achieving HAZMIN/PP goals. Some of these data are required by, and available through, the Army Compliance Tracking System (ACTS). Exceptions are for the multimedia pollution components such as air pollution, potable water and stormwater runoff which ACTS only touches on for the permitting process. The data for all multimedia/PP projects shall be reported on the HAZMIN/multimedia/PP Data Report (see Appendix A). The HAZMIN/PP report is due at HQ AMC NLT 20 April. The narrative section of the report should include, if appropriate, any difficulties encountered that interfered with the successful completion of any HAZMIN or PP projects.

CHAPTER 7 - HAZMIN/POLLUTION PREVENTION PROJECT FUNDING

7-1 GENERAL.

a. Since 1985, AMC has made significant strides in reducing HW generations and disposal. Many of these reductions were made using PP concepts even though the PP concepts were not specified. Immediate results were achieved through command emphasis at all levels, increased awareness of HW control by all personnel, and aggressively improved housekeeping at all facilities. The Command must continue its progress and future reductions will require continued research and development as well as extensive

capital investments. Several avenues exist, and are available to the installations and the MSCs, to obtain funding for HAZMIN/PP projects.

b. Funding for HAZMIN/PP projects is not different than other programs; there are insufficient funds to immediately execute all desired projects. A recent change in Army policy that will help these efforts has been announced: Class III environmental projects (HAZMIN/PP), that have an economic payback of less than two years, will be a "MUST FUND" project during FY 94. All other projects will be prioritized by the MSCs and HQ AMC based on the degree of waste reduction, level of increased protection to human health and environment, capital cost and economic payback.

7-2 DEFENSE ENVIRONMENTAL RESTORATION ACCOUNT (DERA) FUNDING.

a. Until the end of CY 94, a portion of the DERA is set aside for HAZMIN/PP projects, studies, and research and development efforts. This money is managed, via command channels, by the Army Environmental Center (AEC).

b. All Projects competing for DERA funding must be submitted through AMC, AMCEN-A, to AEC, via RCS DD-P&L 1383 Report Project Exhibits. The narrative section of this document must start with the word "Minimization". The narrative must contain the expected percent of waste reduction, identify specific waste streams to be reduced, and describe the equipment or process modification that will result in the reduction of the waste. The estimated economic payback period shall be included. If money will continue to be saved after amortization, include the estimated annual monetary savings. Additional guidance on DERA funding requests is contained in Paragraph 6-6, AR 200-1, Environmental Protection and Enhancement.

c. Within DESCOM, WMCA funds are available for HAZMIN/PP projects. These funds are limited to DESCOM installations as they are derived from the Army Industrial Fund (AIF). This funding line is currently expected to exist through FY 94 and will not be less than one half of one percent of the 1988 AIF (approximately $5.1M). Requests for WMCA funding of HAZMIN/PP projects shall be submitted to HQ, DESCOM, AMSDS-IN-E, with copy furnished to AMC, AMCEN-A.

CHAPTER 8 - INCENTIVE AWARDS PROGRAM

8-1 ARMY HAZMIN INCENTIVE AWARDS PROGRAM.

a. Background. The Secretary of the Army's Hazardous Waste Minimization Incentive Awards Program was approved 28 November

1991 for immediate implementation. The program provides significant monetary awards to both installations and personnel to recognize and reward efforts in the minimization of hazardous waste.

b. Program Overview.

(1) The Secretary of the Army's Incentive Plan is attached as Appendix C and contains the information and procedures to nominate candidates for the rewards. This program allocates $500,000 per year for installation awards and $100,000 per year for individual awards. AMC is allowed to forward four installations and four individuals each year NLT the 15 March suspense date established by the Secretary. All award nominations must be received by HQ, AMC, AMCEN-A NLT 28 February of each year. These nominations are reviewed by an awards review committee and approved by AMC EMAG prior to submittal to HQDA.

(2) Although not required, installation winners are strongly encouraged to use the award funds to support other environmental projects at the installation.

(3) This program provides the opportunity to recognize and reward those installations and individuals who have accomplished so much, encourage additional efforts in this critical area, and provides an additional funding source for environmental projects. All AMC installations, activities, and MSCs shall support this program.

8-2 POLLUTION PREVENTION AWARDS.

a. Background. The Army has established a Pollution Prevention and Recycling Award Program. Teams of 5 or more military and civilian employees, contractor employees, and non-appropriated fund employees may apply. Appendix D is a copy of the cover letter and format for submitting an application for this award.

b. Purpose. The purpose of these awards is to recognize efforts to prevent pollution at the source, including practices that reduce or eliminate the creation of pollutants through increased efficiency in the use of raw materials, energy, water, or other resources. Also eligible are efforts to divert materials from the waste stream for recycling.

CHAPTER 9 - DMWR/MILSPEC

9-1 GENERAL. All AMC elements need to identify DMWRs and MILSPECs that are causing the installations environmental problems because of the constraints they put on HAZMIN and PP. Requests for assistance in facilitating changes or "fixes" to the DMWRs and MILSPECs should be forwarded through command channels to HQ AMC. Requests should include information concerning the environmental/quality control problems and attempts to influence the acquisition/logistic community for action. By passing any information back to HQ AMC, as a narrative on the HAZMIN/PP Data Call Report, the facility/installation personnel can be a valuable resource in the solution of the problem.

9-2 INCENTIVES. The main incentive for all personnel to work toward changing DMWRs and MILSPECs, that are environmentally restrictive, is to produce a better product while reducing, or eliminating, a pollution problem. Of equal interest is the opportunity to achieve both recognition and reward through the Army's Hazardous Waste Minimization Incentive Awards Program and Pollution Prevention and Recycling Awards Program (see Chapter 8).

APPENDIX A HAZARDOUS WASTE GENERATIONS REPORT INSTRUCTIONS

A-1 GENERAL.

a. The Hazardous Waste Generations Report is the major element of the Installation HAZMIN Plan as it provides the previous years generations, reductions, and disposals of HW. This is the means through which the effectiveness of the AMC, MSC, and installation's HAZMIN programs and achievement of goals will be measured. This report will track HW from the point of generation to ultimate disposal. Information will be reported on the Army Compliance Tracking System (ACTS) version 1.1.

b. In order to minimize effort, the annual data shall be entered in the specified format contained in the ACTS. Only the current reporting period data must be entered. This format will not be altered without prior concurrence of HQ AMC (AMCEN-A).

A-2 DATA ITEMS. The following are explanations of each of the required data items of the HW Generations Report:

a. Process or Generation. The specific unit operation/process that is the source of the HW, e.g. electroplating rinse, electroplating spent bath (cad), paint blast media, etc. The specific unit operation is a mandatory identification field in the ACTS. These process names can be identified by using the "information key" [F4] while viewing the ACTS, HAZMIN spreadsheet screen. The specific process is listed first with the type of waste generated from the process listed below. As an example, the first process listed on the spreadsheet is electroplating. Wastes generated from electroplating include rinse water, bath sludges, etc. Note that electroplating also has an electroplating subset. This can be used to document those HWs generated from these processes that cannot be more specifically identified. New HWs can be added in the spaces provided between the listed waste types. It is important to keep the names and titles of processes and waste types consistent from one reporting year to the next.

b. EPA type. In this data column, the EPA hazardous waste code, e.g. F006, K046 must be indicated. If a waste has a state code but not an EPA code, list the state code. In those cases where a waste generated from a specific process contains two codes, enter each separately. If a specific waste has both a state code and an EPA code, list only the EPA code. If the waste is regulated by the state but does not have a specific code, or, the state code is too long for the space provided, use code Z000.

c. Baseline. Refers to the quantities of regulated HW generations generated in 1993. The 1993 generations are the baseline against which all other year generations are compared for goal purposes. One time generated waste is also reported but these will not be included in the industrial HW goal calculation. This data has already been entered on the report. Requests for any changes of the baseline generations figures must be made under separate cover through the appropriate MSC to AMC, AMCEN-A.

d. Last period. Refers to the previous year report period. This data has already been entered in the report from the installations last submittal of their plan. This data can not be adjusted without the prior approval from the appropriate MSC and HQ AMCEN-A.

e. Current period. Refers to the current calendar year report period, 1 January to 31 December. As an example, the Plan and Generation Report received by HQ, AMC by 20 April 1994 will cover operations during calendar year 1993.

f. Fate. Quantity of both source and regulated HWs generated by process or operation. In those cases where multiple minimization actions have been performed on a single wastestream, separately list and quantify the waste for each action with the appropriate minimization fate code. If no minimization actions were taken, state the quantity and enter the disposal fate code.

g. Fate codes. Fate codes are single digit alpha codes that describe the minimization action and/or disposal done to the quantity of HW listed in the fate column. The fate codes are contained in the following paragraphs.

(1) "R" Applies only to that HW that is recycled/reclaimed on the installation but performed separately from the generating process. Wastes that are recycled/reclaimed within the process as defined by EPA are not reported as they never leave the process as a waste. It must be remembered that in any distillation of solvents, the resulting bottom sludges may be hazardous and, as such, must be reported as a HW generation.

(2) "U" Reused without reclamation but not in the originating process, e.g. spent acids or acid waste stream used for pH adjustment at the IWTP. For HW used as fuel supplements, use fate code "B". Fuel supplements are exempt from RCRA and are not a regulated generation.

(3) "O" Recycled/reclaimed by off-post contractors and returned to the installation for use in the originating or a different process. Include such actions as solvent service or carbon reactivation contractors.

(4) "G" Recycled/reclaimed/sold to an off-post contractor or organization by the installation, not through DRMO, and a like product not returned to the installation. An example is the sale or donation of redwater to a paper mill directly by the installation. If a like product is provided to the installation by the receiving contractor, use fate code "O".

(5) "M" Recycled/reclaimed/sold through DRMO and a like product not returned to the installation. If a like product is returned to the installation through DRMO, use fate code "O". This code indicates that the installation HW generation was put to some beneficial use as opposed to disposal to the environment.

(6) "T" Treated at an industrial treatment plant or pretreatment plant where the treatment resultant wastestream is discharged to the environment via NPDES permit or to the sanitary sewer system. A HW product may be also be produced as part of the treatment process. If so, it shall be reported as a HW generation.

(7) "I" Incinerated or thermally treated. Examples would include open burning/open detonation and thermally treated granular activated carbon. If the regenerated activated carbon is reused, use a fate code "R" or "O", depending if the treatment was performed on or off the installation.

(8) "B" Burned as a fuel supplement. A form of reuse but identified as a separate category.

(9) "S" Storage. Placed in permanent conforming storage as there is no available disposal technique. Do not use this category for temporary storage such as wastes that are awaiting a HAZMIN action or disposal. For temporary stored wastes awaiting disposal, recycling, or treatment/reclamation action at the time of the report due date, assume that the action has been completed.

(10) "D" Disposal. Ultimate disposal off-site not through DRMO.

(11) "E" Disposal. Ultimate disposal off-site through DRMO.

(12) "F" Disposal. Ultimate disposal on-site.

(13) User Fate Code. In some cases, a specific HW generation may not fit into one of the established fate codes. In this case, installations may define a new specific fate code for that waste. This should only be done if absolutely necessary and must be defined by footnote and in the narrative of the report. HQ AMC will review any newly defined installation fate codes for possible incorporation in the next AMC HAZMIN Plan.

A-3 GENERATION.

a. Definitions.

(1) Source generation. Those hazardous wastes that are a direct result of an industrial process, operation, and/or maintenance activity. Usually measured at the end point of the specific process or operation. A source generation may be a regulated generation (see below).

(2) Regulated generation. Those hazardous wastes produced by an industrial process, operation, and/or maintenance activity at the point where it is first defined as a regulated hazardous waste by RCRA and/or States with EPA approved RCRA programs. A regulated hazardous waste generation may be a source generation or resulting byproducts from treatment.

(3) Hazardous waste disposal. Those hazardous wastes that are buried or placed in a permanent location on the installation without any further intent of minimization actions on the waste and those hazardous wastes that are removed from the physical boundaries and/or custody/accountability of the installation or facility for ultimate disposal.

b. The quantity of all source and regulated generations shall be expressed in kilograms. All HW process streams that result in a regulated hazardous waste along the life cycle of that stream must be reported. The generations must be identified as specifically as possible, e.g. pink/redwater, electroplating rinse water, paint stripping sludge, IWTP sludge, etc. Hazardous waste sludges, and other treatment resultant wastes must be included as a separate line item from the process wastestream. If an IWTP sludge is primarily a result of a single process/operation then so indicate, e.g. IWTP (LAP) sludge. Include those waste streams that are labeled hazardous material for the purpose of transferring custody or accountability to DRMO and are normally "waste-like" (see fate code "M"). All EPA listed, or characteristic HWs and State regulated HWs, should be turned in to DRMO as a waste and not as a material. Do not include hazardous materials that are not "waste-like" (i.e. out of spec paint) and are sold or given away; this material never became a waste. List this material, quantity, and fate on a separate page or include in the narrative of the Installation HAZMIN Plan if pertinent to only a few items. The presence or absence of the appropriate EPA or state HW code (D001, etc.) will be used to differentiate between a regulated HW generation and a non-regulated source generation/process waste. For example, waste oil must be reported annually. If there is no code attached in the appropriate column, it will indicate that the

waste oil is not regulated as a HW by either EPA or the State. Do not include HW generations that are a result of CERCLA/SARA actions, Installation Restoration actions, or building demolition actions. Spills and wastes generated due to "one time" occurrences, such as laboratory cleanouts, must still be reported.

c. Some source generations may be difficult to quantify. In such cases, source generation estimates must be made based on sound engineering judgement. If estimates are used, include a footnote to that effect and the rationale used.

A-4 ADDITIONAL GUIDANCE.

a. Include solvent quantities that are recycled under service contracts. These are still regulated generations.

b. Include demil bodies as well as ash if appropriate (non-goal).

c. Include waste oil as a separate entity. Indicate if waste oil is a regulated waste in your state or is regulated by characteristic by showing the appropriate EPA/state HW code. Regulated waste oil is included in the goal-tracked wastes, unregulated waste oil is shown as a complete separate item but no code will be listed under the "EPA Type" category.

d. Do not include PCBs or asbestos as a HW in the report unless it is specifically regulated in your state. PCBs and asbestos will be considered a one-time generated waste.

e. Do not use a category "other". List all HW separately.

A-5 NARRATIVE.

a. The 20 April submittal of the Installation Hazardous Waste Minimization Plan and the included Generation Report will consist of the narrative portion of the Plan, and the input of HAZMIN information reported to the ACTS.

b. The narrative portion of the Generation Report will be limited to footnotes on the hard copy print out from the floppy disk. These footnotes will be used to clarify data entry items where necessary. Examples would include further defining a "one time" generation and detailing any large difference in a process' HW generation rates. Any additional data or comments desired by the installation may be included.

APPENDIX B GUIDANCE FOR MULTIMEDIA/POLLUTION PREVENTION DATA REPORT

B-1 GENERAL. The HAZMIN Program is being expanded into a comprehensive, multimedia pollution reduction program. In order to facilitate this effort, additional media data is requested. The information called for in this report should be obtained from other installation reports, particularly ACTS, and does not require additional surveys or inventories. Do not initiate a study or other intensive effort to obtain data for this report.

B-2 DATA ITEMS. The following are explanations of each of the required data items and attached is an example of a LOTUS spread sheet for the submissions. Any required clarifications or additional information shall be annotated as a footnote on the hard copy print out.

a. Wastewater. Information can be obtained from utility operations and treatment plant records, such as discharge reports for wastewater. Data is to be reported in million gallons (MG) of total wastewater treated/discharged. The following discharge codes are to be used for this report:

NPDES - Wastewater directly discharged after treatment per National Pollutant Discharge Elimination System (NPDES) permit.

POTW - Wastewater discharged after treatment to a publicly owned treatment works (POTW) per treatment permit.

STP - Wastewater discharged to on-post sewage treatment plant after treatment.

DIRECT - Wastewater discharged directly to receiving water, without treatment per NPDES permit.

INDIRECT - Wastewater discharged to POTW without treatment.

b. Water supply. Information can be obtained from utility operations and treatment plant records. Data is to be reported in million gallons (MG) of total water purchased or treated. The following treatment codes are to be used for this report:

TREATED - Water treated by the installation.

PURCHASED - Water purchased from outside the installation.

c. Air Emissions. Information will be obtained from state air pollution operating permits and is to be reported in maximum permitted emission levels in tons per year. Emission information from inventories other than operating permits may be used if

available. Do not perform or contract services for an in-depth air emission inventory to complete this portion of the data call. Submission for these data fields are not required from installations not having air pollution operating permits. The following permit codes are to be used for this report:

PERMIT - Emission level based on permitted emission.

INVENTORY - Emission level based on inventoried emission.

NO PERMIT - No permit or inventory on this emission is available.

d. Recycling/Reuse. Information is to be obtained from installation utility/solid waste operations and/or the Recycling Coordinator. The emphasis in this section is on capturing data on the non-hazardous solid waste being generated or recycled at the installation. If the installation is conducting a recycling program under state and/or local regulations and the program meets all requirements laid down in AR 420-47; answer yes to the recycling program question. Answer yes for those non-hazardous items that are recycled. Enter the quantity of material recycled in thousand pounds and enter the proceeds in dollars for the value of the items recycled. Definitions/Codes for this section are as follows:

DEFINITIONS

RECYCLE - The conversion of solid waste (materials no longer needed) into new product or energy by using the resources contained in the discarded materials. Materials classified as reused are not counted as recycled. Reused materials are those materials reintroduced into the economic stream without any chemical or physical change.

PAPER PRODUCTS - Any type of paper material that the installation recycles such as: newspapers, correspondence, memos, cardboard, wrapping paper, computer paper, and fax paper. Do not include paper collected for re-use (paper used only on one side, to be used for printing on the other side), or paper saved by conservation measures.

NON-PRECIOUS METALS - Metals such as steel, stainless steel, aluminum, cast iron, lead, copper, and brass collected for recycling. Do not include salvaged and reused items such as copper pipe and fittings for reuse.

SOLVENTS - Solvents recycled which do not meet the definition of a hazardous material by Federal, state, local or Army definition. May include detergent based, or petroleum based products, with a flash point above 150 degrees F.

PLASTICS - Any type of recyclable plastic material such as wrappings, food and beverage containers, and packaging materials.

OTHER - Any other material recycled by the installation such as glass, tires, used oil, etc., if it is not considered a hazardous material or hazardous waste in the state.

QUANTITY - Report in thousand pounds the amount recycled.

PROCEEDS - Report the amount of money (in dollars) generated. If the installation lost money on recycling, enter the amount as a negative number.

CODES

Y = Yes
N = No
Leave the field blank if the information is not available.

e. Pollution Prevention. To complete the spreadsheet, additional information can be obtained from industrial, logistics and energy usage records. Also, for each pollution prevention program submit a brief narrative of the previous system and the revised system. Include the any side benefits (moral, public relations, appearance, etc.).

(Lotus Spreadsheet)

MULTIMEDIA

Wastewater	CY Quantity, MG	Discharge Code
Industrial		
Domestic		
Non Contact		

Water Supply	CY Quantity, MG	Treatment Code
Potable		
Industrial/Fire		

Air Emission	CY Quantity, tons/yr	Air Permit Code
CO		
NOx		
SOx		
VOCs		
Particulates		

Pollution Prevention Process or Material	CY Quantity W/Units	Dollars Saved (Increases)	Personnel Reductions (Increases)

APPENDIX C SECRETARY OF THE ARMY HAZARDOUS WASTE (HW) MINIMIZATION INCENTIVES AWARD PROGRAM

REPLY TO
ATTENTION OF

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: The Secretary of the Army Hazardous Waste (HW) Minimization Incentive Awards Program

As part of the "U.S. Army Environmental Strategy Into the 21st Century" all of us must demonstrate progress in each pillar category in order to have a successful environmental program. With this in mind, the annual Secretary of the Army Hazardous Waste (HW) Minimization Awards Program highlights accomplishments within the prevention pillar. Participation in this awards program is evidence that the pollution prevention ethic is spreading throughout the entire Army community and all mission areas.

The competition involves installations and individuals from all MACOMs, the National Guard Bureau and the Army Reserve. Participation is encouraged from all Army activities. The program recognizes outstanding installations and individuals with monetary awards for significant achievements resulting in reducation of hazardous waste. Enclosed is the award program guidance, which has been revised for calender year 1993.

Nomination packages for the period ending 31 Dec 92 should be submitted to MACOMs in accordance with the guidance distributed previously for calender year 1992 submissions. Further, the award nominations are then required at Department of the Army by Thursday, 15 Apr 93. Award nominations for the period ending 31 Dec 93 should be submitted to the DA by Wednesday, 1 Dec 93. We have moved the nomination suspense forward so we can make the award presentations more timely on the following Earth Day.

Michael W. Owen
Acting Assistant Secretary of the Army
(Installations, Logistics & Environment)

Enclosure

Secretary of the Army
Hazardous Waste Minimization
Incentive Awards Program

1. REFERENCES.

a. Memorandum, ASA(I,L&E), 14 Sep 88, subject: Hazardous Waste Reduction Award.

b. Memorandum, ASA(I,L&E), 20 Jul 87, subject: Hazardous Waste Minimization.

c. AR 200-1, 23 Apr 90, Paragraph 6-6(f), "Environmental Protection and Enhancement."

2. PURPOSE. To establish and provide guidance for the Secretary of the Army Hazardous Waste Minimization Awards Program.

a. This program provides incentives for major commands (MACOMs), installations and individuals to advance and support directly the Department of Defense (DoD) and Army hazardous waste minimization goals.

b. It does so by rewarding and recognizing achievements leading to reduced volume or quantity and toxicity of hazardous waste generated by Army operations and activities.

3. SCOPE. This guidance applies to Department of the Army (DA) Active and Reserve components, including Army National Guard and Army Reserves. Its provisions encompass:

a. An Installation Award Program applying to all military installations and separate activities located both CONUS and OCONUS.

b. An Individual Award Program applying worldwide to all DA personnel (civilian and military).

4. POLICY. Hazardous waste minimization is concerned with reducing risk to human health and the environment, while also conserving resources.

a. It is Army policy (AR 200-1, paragraph 6-6) to implement environmentally necessary and economically practicable actions reducing the quantity or volume and toxicity of hazardous waste generated by Army operations and activities.

hazardous waste generation from Army activities, it is Army policy to recognize, through an awards program, outstanding achievements in support of this goal.

c. This awards program is intended to foster creative thinking related to hazardous waste minimization and improve management efficiency.

5. RESPONSIBILITIES.

a. The Deputy Assistant Secretary of the Army for Environment, Safety and Occupational Health (DASA(ESOH)) will:

(1) Issue policy for and monitor the Secretary of the Army Hazardous Waste Minimization Incentive Awards Program.

(2) Designate members and chair a committee of judges (composed of members of the HQDA Hazardous Waste Minimization Working Group and other activities/agencies deemed appropriate) that will select the most outstanding candidates.

(3) Issue notification of award presentation by the Secretary of the Army.

b. The Director of Environmental Programs (DEP) will:

(1) Act as the Executive Agent for the DASA(ESOH) in implementing the awards program.

(2) Issue Army guidance on the operation and execution of the awards program.

(3) Develop rating criteria and internal operating procedures for the committee of judges.

(4) Recommend committee members to the DASA(ESOH).

(5) Develop nominations and awards selection criteria.

(6) Administer the distribution of awards to the MACOM level.

c. The Chief of Public Affairs will support the awards program with appropriate internal and external communications and ensure that the award criteria for selected winners receive wide publication each year. These criteria should provide insight and encouragement for application by other installations, activities, and individuals.

17 February 1993

(1) Evaluate all submissions from their installations or separate reporting activities, provide a recommended ranking, and forward nominations to Director, Environmental Programs, ATTN: ENVR-EH, Chief of Engineers, 2600 Army Pentagon, Washington, D.C. 20310-2600 by 1 December of each year.

(2) Ensure representatives of nominated installations or separate reporting activities and nominated individuals are available to make presentations to the HQDA judging committee, if requested. HQDA will provide funding for TDY of said individuals.

(3) Supplement this program with a MACOM Hazardous Waste Minimization Incentive Awards Program, if desired.

(4) Administer the distribution of awards to the winning installation or separate reporting activity civilian personnel offices.

e. Installation or separate reporting activity commanders will:

(1) Nominate individual personnel for their efforts in reducing the generation of hazardous waste from installation activities.

(2) Nominate the installation activity where the collective efforts of installation personnel contributed to reducing the generation of hazardous waste from the installation.

(3) Where appropriate, combine separate hazardous waste minimization projects to portray accurately the total picture of hazardous waste minimization at an installation.

(4) Encourage interdisciplinary participation through local publicity and by affording all personnel equal opportunity to receive awards.

(5) For awards not presented at higher headquarters, present awards and issue monetary benefits to winning personnel and activities.

f. The U.S. Army Environmental Center (USAEC) will:

(1) Upon request from either the HQDA judging committee or MACOM commander, evaluate submissions to confirm actual hazardous waste minimization based on reduction of quantity and/or toxicity.

required.

(3) Program and budget award money under MDEP VENC.

6. PROGRAM.

a. General. The awards program consists of monetary and recognition awards to be given annually to both installations or separate reporting activities as well as to individuals making the greatest contribution to hazardous waste minimization.

(1) Installations and/or separate reporting activities will receive monetary awards. Enough funding will be programmed so that both "large" and "small" installations can be recognized annually. Both civilian and military personnel are eligible for individual monetary awards. Winning installations are eligible to compete in subsequent competitions. In normal circumstances, individuals are eligible for monetary awards in consecutive years. However, the program will be most effective in terms of enhanced and widespread participation if as many individuals as possible are recognized over time.

(2) In the initial year, awards can be based on cumulative achievements over the period starting FY 87. Subsequently, awards can be based either on cumulative accomplishments which show significant improvement over a multiyear period, or solely on preceding year accomplishments. When cumulative efforts are recognized, installations should not receive awards covering overlapping or duplicative timeframes.

b. Uses for Monetary Awards. Using award money to support the environmental program is strongly encouraged. In addition to personnel recognition, installations or activities can use monetary awards for a variety of projects at the commander's discretion. These include new or continuing waste minimization efforts (to include local or MACOM testing of suggestions), environmental enhancement projects. Morale, recreation and welfare activities can also be funded.

c. Waste Minimization Goals. Reduced hazardous waste generation can be realized through a wide variety of methods. Attachment 1 outlines a generalized--but not exclusive--approach to techniques that can be considered for purposes of this award. In accordance with national, DoD and Army HAZMIN priorities, emphasis should be placed on:

(1) Source reduction methods such as alternative (non-hazardous) material substitution, materials recovery, and process change.

1/ February 1993

(2) Source [illegible]
source segregation of waste.

(3) On-site treatment to reduce the quantity and/or toxicity of hazardous waste.

d. Awards.

(1) General. Awards will be given based on quantity of hazardous waste reduction, percent of hazardous waste reduction, and significant accomplishments in toxicity reduction or cost saving. A total of up to $600,000 will be programmed annually to be available for monetary awards.

(2) Installation Awards. From the total program amount, up to $550,000 will be allocated as Installation Awards. Provided enough nominations are made, a minimum of five and maximum of ten awards will be made. At least ten percent of each award should go to personnel most responsible for the success of the program. This can be on either a group or individual basis, with a maximum of $5,000 may go to the key person, and the remainder going to persons who contribute materially to program success. Based on the number of awards and available funds in a given year, the following range of Installation Award amounts is anticipated:

- First Place: $150,000 to $250,000
- Second Place: $50,000 to $150,000
- Third Place: $25,000 to $50,000
- Fourth Place: $10,000 to $25,000
- Remaining Places: $10,000 to $25,000

(3) Individual Awards. From the total program amount, up to $50,000 will be allocated for separate Individual Awards in addition to individual recognition under the Installation Awards. Since hazardous waste minimization is a total Army team effort, deserving individuals at any installation or separate activity may be nominated, irrespective of whether that installation or activity participates in the Installation Award program. Provided enough individuals are nominated, a minimum of five and maximum of ten awards in amounts ranging from $2,500 to $5,000 will be made.

(4) Any portion of monetary benefits not awarded in a given year will be used at the selection committee's discretion.

(5) Names of personnel receiving monetary recognition at the Installation Award level will be reported to the MACOM Environmental Office.

e. Review Criteria. Submissions will be judged on the following criteria:

(1) Type and toxicity of hazardous waste reduced.

(2) Process or procedures used for minimizing hazardous waste generation (i.e. recycling, process change, material substitution, alternate technology).

(3) Cost savings.

(4) Total weight reduction based on overall reduction for the installation and reduction within an individual project.

(5) Total percent reduction of hazardous waste based on overall reduction for the installation and reduction within an individual project.

(6) Compliance with restrictions on newly identified hazardous wastes, given the dynamic and increasingly stringent nature of hazardous waste regulatory requirements.

7. PROCEDURES.

a. General. Nominations for each year must be received at HQDA, Director, Army Environmental Programs, ATTN: ENVR-EH, no later than 1 December of that year. Each award will be given in the form of cash, plaques and certificates to winning installations and individuals.

(1) For this awards program, the National Guard Bureau (NGB) is defined as a MACOM. The Army National Guard of each State/Territory is defined as an installation of the NGB MACOM.

(2) All Army activities and personnel, to include HQ elements as well as Research, Development and Engineering Centers, Laboratories, and Acquisition PEO/PM may be nominated.

b. Installation Awards. As noted at paragraph 6a(2), these awards are based on either cumulative multiyear or single preceding calendar year achievements at an installation or separate reporting activity of any size. A separate reporting activity is defined as a subordinate command, agency or activity with a specific mission which cannot be otherwise considered as an installation.

(1) Each MACOM, to include the NGB and USAR, may submit up to four nominations no later than 1 December for that calander year. Six copies of each nomination package are required. Nominations will be in narrative style and include the applicable items noted in attachment 2. They shall be typewritten or printed and fastened or bound in folders not to exceed 9 by 11 inches.

(2) Nominations will be judged on substantive content. They should be prepared for possible use in public information and education. The nominations should be concise and describe the program and accomplishments accurately. Graphic summaries, highlights, explanatory captions, tables, charts or other formats that clarify the content are encouraged. Installation/Activity Commanders must endorse the nomination.

c. Individual Awards. Based on individual achievements, each MACOM may nominate up to four personnel for recognition by the Secretary of the Army. Nominees can be involved in any aspect of hazardous waste minimization, including management levels such as the MACOM or Installation Environmental Office.

(1) Nominees may be civilian or military personnel having made significant contributions to the hazardous waste minimization program. With the initial award year exception, only the individual's efforts that occurred during the preceding calendar year are to be included in the nomination submission.

(2) Individuals should only receive monetary awards from one part of the program in any given year. If also eligible for recognition under the Installation Award program, individuals should only receive a monetary award from the program providing the best financial benefit. Winners of Individual Awards are otherwise ineligible for monetary awards in the same year under the Installation Award program. The award citation will be included in the official personnel file of individuals selected for these awards.

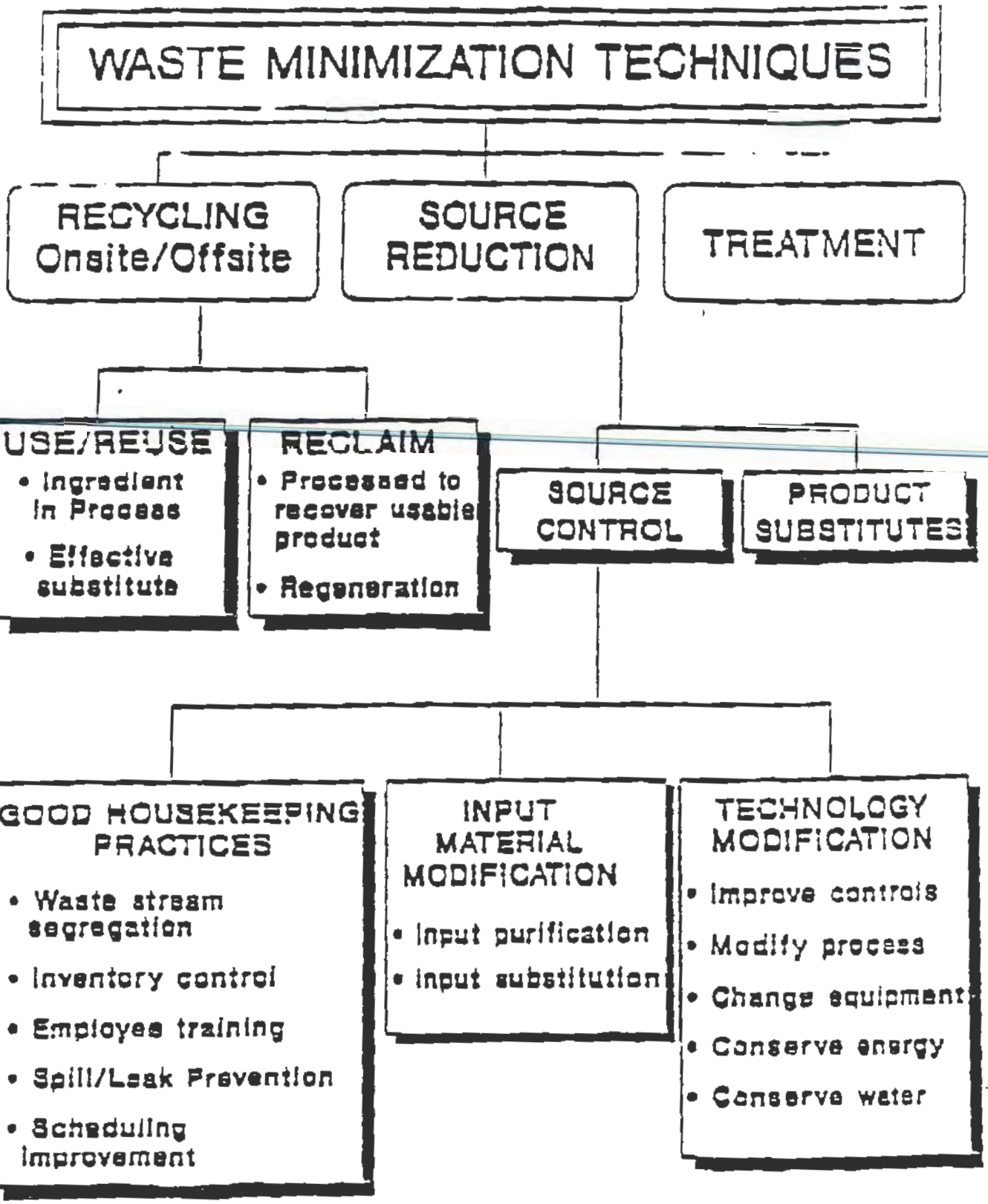
d. Nomination Content. Award nominations will focus on specific contributions in each program. Initiatives, progress, and achievements shall be clearly described.

(1) Installation Award nomination will be made in the format described at Attachment 2.

(2) Individual Award nominations should be in narrative style and not exceed four typewritten pages in length, including special achievements or contributions. Submission through the supervisory chain of command is required. If the nominee is a supervisor, the package should identify what was done directly by the individual or resulted from supervisory capabilities and leadership.

8. EFFECTIVE DATE AND IMPLEMENTATION. This program is effective immediately.

17 February 1993


WASTE MINIMIZATION TECHNIQUES
RECYCLING Onsite/Offsite
SOURCE REDUCTION
TREATMENT
USE/REUSE
• Ingredient in Process
• Effective substitute
RECLAIM
• Processed to recover usable product
• Regeneration
SOURCE CONTROL
PRODUCT SUBSTITUTES
GOOD HOUSEKEEPING PRACTICES
• Waste stream segregation
• Inventory control
• Employee training
• Spill/Leak Prevention
• Scheduling improvement
INPUT MATERIAL MODIFICATION
• Input purification
• Input substitution
TECHNOLOGY MODIFICATION
• Improve controls
• Modify process
• Change equipment
• Conserve energy
• Conserve water

Attachment 2

Installation Award Nomination Format for the Secretary of the Army Hazardous Waste Minimization Incentive Awards Program

1. Introduction.

a. Mission, approximate civilian and military population of the installation or activity.

b. Any change in mission and how mission has ihcreased or decreased hazardous waste generation in the past calendar year.

c. Describe organization and staffing of the environmental management program. Enclose an installation organizational chart including the environmental staff.

2. Background. (should not exceed two pages)

a. Describe objectives of the hazardous waste minimization program and degree of prior attainment.

b. Describe the most outstanding program features and accomplishments of the past two years.

c. Summarize hazardous waste minimization achievements during the award period.

3. Accomplishments. Describe activities and achievements during the past calendar year and/or the years over which significant accomplishments were made in the following areas:

a. Weight reduction in hazardous waste generation calculated in thousands of pounds compared to previous year.

b. Percent reduction in waste generated from previous year.

c. Techniques employed to achieve reduction/minimization.

d. Cost/benefit economic analysis.

e. Copy of applicable Installation Annual Hazardous Waste Report for the past calendar year.

f. Waste generation /disposal data for previous five years.

g. Hazardous waste generated from installation restoration activity must be identified separately. This will be excluded from the consideration unless the specific basis of significant accomplishments on which nomination focuses is the quantity and/or toxicity of such waste.

h. When appropriate, and to show good relations and support by the regulatory agencies and other federal agencies, the nomination package may reference letters of endorsement or commendation from those agencies.

APPENDIX D SECRETARY OF THE ARMY

POLLUTION PREVENTION AND RECYCLING AWARD PROGRAM

OFFICE OF THE CHIEF OF ENGINEERS
WASHINGTON, D.C. 20310-2600

REPLY TO
ATTENTION OF

ENVR-EP (200-1)

5 NOV 1992

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: 1992 Secretary of the Army Environmental Awards

1. It is Department of the Army policy to protect and enhance environmental quality, and to recognize through an annual awards program the outstanding achievements in support of this policy.

2. The environmental awards program for FY 92 has been revised and expanded by OSD, and includes a new award category, Pollution Prevention and Recycling. This category includes awards for team and individual effort.

3. Enclosures 1 through 3 give detailed explanations of award format and considerations. This year's Environmental Quality Award is for industrial installations, but the Pollution Prevention and Recycling Award is open to teams assigned to any type and size of installation. Awards do not apply to Corps of Engineers Civil Works installations or functions.

4. The winners of the Secretary of the Army awards will be the Army's nominees for the Secretary of Defense Environmental Awards; this OSD awards ceremony is scheduled for Earth Day, 21 Apr 93.

5. Nomination packages should be sent through command channels in time to arrive at the Army Environmental Office by 1 Feb 93. The number of nominations per award, per MACOM should be consistent with Table 12-1, AR 200-1. MACOMs should screen all submissions, and submit a copy of the latest ECAS report for installations if available.

FOR THE CHIEF OF ENGINEERS:

Encls

JOHN D. GLASS
Colonel, EN
Chief, Army Environmental Office

POLLUTION PREVENTION AND RECYCLING AWARD

AWARD CONSIDERATIONS AND FORMAT

Purpose: To recognize efforts to prevent pollution at the source, including practices that reduce or eliminate the creation of pollutants through increased efficiency in the use of raw materials, energy, water, and other resources; efforts to divert materials from the waste stream for recycling.

Teams rather than installations are eligible for this award. A team must be five or more individuals; size or type of activity for which the team works does not matter. Teams may consist of military and civilian employees, employees of operating contractors, and non-appropriated fund employees. Team nomination should not exceed 50 pages, and must be printed on recycled paper and on both sides. Format for team nominations follows.

1. Introduction

   a. Mission of the activity or installation nominating the team.
   b. Approximate civilian and military population (unclassified) of the activity or installation nominating the team.

2. Background

   a. Summarize the environmental challenges at the activity or installation.
   b. Describe the organization and staffing of the team, including the functional offices represented and the management approach used.
   c. Describe any installation and community committees or boards that influence the team's pollution prevention program or project.

3. Program Summary

   a. Describe the objectives of the pollution prevention program and the degree of attainment of each objective during the past two calendar years.
   b. Describe the most outstanding program features and accomplishments of the past two years.

4. Accomplishments

Describe activities and accomplishments during the past two years in the following areas (where applicable):

a. Acquisition
   (1) System design and evaluation.
   (2) System test and evaluation.
   (3) System manufacturing.
   (4) Life-cycle impacts.
   (5) Reviews of systems for pollution prevention and source reductions.
   (6) Involvement of program managers and program executive officers.
   (7) Impacts on logistics support.

b. Material Substitution
   (1) Military specifications.
   (2) Military standards.
   (3) Depot Maintenance Work Requests, Maintenance Cards, Technical Orders.
   (4) Impacts of substitutes.
   (5) Environmental problem(s) eliminated.
   (6) Activities impacted by the substitution, including ability to transfer to other installations, activities, and Military Services.

c. Process Modification or Improvement
   (1) Original process, including cost to operate, length, efficiency, and environmental impacts.
   (2) Changes to the process, including cost to operate, length, efficiency, and environmental impacts.
   (3) Reductions (risk, cost, emissions, hazardous materials use) achieved.
   (4) Ability to transfer to other installations, activities, and Military Services.

d. Improved Material Management
   (1) Supply management changes.
   (2) Savings achieved (risks, costs, hazardous materials).

e. Recycling Programs
   (1) Type of recycling program.
   (2) Size of program.
   (3) Activities or communities impacted.
   (4) Reductions in waste streams achieved.
   (5) Purchases of recycled content goods and materials.
   (6) Close loop recycling projects.
   (7) Source reduction projects.
   (8) Materials removed from the waste stream.

f. Education and Outreach
   (1) Programs to enhance pollution prevention or recycling awareness at any level or any functional area of the Army or outside the Army.
   (2) Community involvement, activities, and affiliation of team members with civic and environmental organizations.

(3) Cooperation with Federal, state, and local agencies, organizations, and academic institutions.

g. Research and Development
   (1) Relationship to user needs.
   (2) Demonstration of results.
   (3) Plans for implementation.

h. Reductions Achieved (a key criterion)
   (1) Starting and ending point.
   (2) Method of measurement.
   (3) Cost saving.
   (4) Life-cycle implications.
   (5) Risk reductions.

APPENDIX E REFERENCES, GUIDANCE DOCUMENTS AND REGULATIONS

AR 70-1, Directs Environmental Activities of the Acquisition Community

AR 200-1, Environmental Protection and Enhancement

AR 420-47, Solid and Hazardous Waste Management

DoD Directive 4210.15, HW Pollution Prevention

DoD Directive 5000.1, Defense Acquisition

DoD Directive 6050.9, Elimination of CFCs and Halons

Executive Order 12088, Military Compliance with all Environmental Laws

Executive Order 12780, Federal Agency Recycling

21st Century Strategy

DoD Instructions/Guidance

EPA Clean Air Act Amendments of 1990

EPA Pollution Prevention Act of 1990

EPA Regulations

CFR