General Electric Company

Final Completion Report for 2013 and 2014 Remedial Activities - Altitude Test Facility (ATF)

GE Aviation, Cincinnati, Ohio

April 2015

Table of Contents

1. Introduction **1**

2. Background & Overview **1**

2.1 History 1

2.1.1 Short-Term and Interim Plan for Select Testing Operations 1

2.2 Long-Term Remediation Plan and Consent Agreement and Final Order 2

3. Remedial Actions **2**

3.1 Introduction 2

3.2 Characterization Sampling 3

3.2.1 PCB Air Sampling 3

3.2.2 Asbestos Containing Material (ACM) Paint Chip Sampling and Analyses 4

3.3 Pipe Removal/Replacement 4

3.4 Phase 1 - Paint Removal from the Interior of Pipe 5

3.5 Phase 2 - Paint Removal from the Exterior of Pipe/Appurtenances 6

3.6 Operation & Maintenance of Pipe with ACM Insulation and Barrier 6

3.7 Inspections & Other Required Actions 7

4. Remaining Work **7**

4.1 Future Pipe Removal (If Any) 7

4.2 Remaining Paint Remedial Activities 8

5. Waste Management **8**

6. Conclusion **9**

Attachments

A Long-Term Remediation Plan (without Attachments)

B Consent Agreement & Final Order

C GE Aviation Short-Term Section 761.62(c) Submission (November 16, 2012)

D USEPA Region 5 December 19, 2012 Conditional Approval Letter

E Indoor Ambient Air PCB Monitoring Plan

1. Air Monitoring Results (2013-2014)

F PCB Awareness Training

G GE Aviation Evendale, Ohio Facility: Request for Amendment to December 19, 2012 EPA Approval Pursuant to 40 CFR § 761.62(c) (December 18, 2013)

H USEPA Region 5 January 16, 2014 Amendment Approval Letter

I Asbestos-Containing Material Paint Sampling and Analyses

J PCB M_L Marker Inspection Logs

K Waste Disposal Records

1. Scrap Metal Recycling Records
2. PCB Bulk Waste
3. PCB-ACM Waste

1. Introduction

This Final Completion Report (Report) has been prepared to summarize the 2013 and 2014 remedial activities, associated analytical data, and waste management records for the Altitude Test Facility (ATF) as outlined in the Long-Term Remediation Plan (Long-Term Plan) (ARCADIS, 2013) (Attachment A) and the Consent Order and Final Agreement (CAFO) filed by the United States Environmental Protection Agency – Region 5 (USEPA) on April 28, 2014 (Attachment B). This report also summarizes additional remedial activities completed in 2014 that were not required to be completed within this timeframe under the Long-Term Plan and CAFO. ARCADIS was contracted by GE Aviation to complete the ATF Remedial activities described herein. All work was performed under the direction and oversight of a licensed Professional Engineer.

2. Background & Overview

2.1 History

On November 1, 2012, GE informed USEPA Region 5 that sampling data received on October 26, 2012 for ATF air induction piping network indicated that paint used by the manufacturer contained greater than 50 milligrams/kilogram (mg/kg) or parts per million (ppm) polychlorinated biphenyls (PCBs). GE collected wipe and paint chip samples from paint on both the interior and exterior of the piping network. GE also conducted air sampling within the piping network during non-test conditions and within the ATF building. A summary of the PCB sampling data was provided to USEPA on November 6, 2012. The sampling and analytical work was conducted in accordance with USEPA-approved protocols.

2.1.1 Short-Term and Interim Plan for Select Testing Operations

On November 16, 2012, the “GE Aviation Short-Term Section 761.62(c) Submission” was submitted to the USEPA (“GE 2012 Submission;” Attachment C). In the 2012 Submission, GE proposed to use the ATF for jet engine testing until July 31, 2013, based on the implementation of an interim risk-based alternative cleanup solution. On December 19, 2012, USEPA approved the use of the ATF, subject to the interim cleanup proposed by GE and certain other conditions (“2012 Approval”; Attachment D). Pursuant to Condition 13 of the 2012 Approval, GE submitted an Air Monitoring Plan for interim engine testing operations on January 8, 2013 (Attachment E). The interim remedial solution, proposed by GE and approved by USEPA, was completed in early January 2013 and included:

- Double wash, double rinse and double paint of the interior of the inlet air induction piping.

- PCB awareness training of GE employees and contractors working in the vicinity of the ATF (Attachment F).
- Installation of PCB M_L markers at appropriate locations, including entrance points to the ATF.

Additional measures were implemented by GE to ensure continuing compliance with the interim solution during January – July 2013 testing operations, including:

- Protection and maintenance of the multi-layered insulation barrier and aluminum sheathing (pipe insulation) used as an effective barrier to PCB-containing paint exposure (further detailed in Section 3.6).
- Prevent damage to and any contact with exposed paint on any valves, fittings and appurtenances.

GE completed a total of four jet engine tests between January and July 2013 under the USEPA interim measures approval.

On December 18, 2013, GE requested an Amendment to the USEPA "2012 Approval" to conduct additional interim jet engine testing between January 1 and April 30, 2014 (Attachment G). USEPA amended the "2012 Approval" on January 16, 2014 to permit GE to conduct jet engine testing during this period (Attachment H). GE completed a total of five jet engine tests between January and April 2014.

2.2 Long-Term Remediation Plan and Consent Agreement and Final Order

In December 2013, GE submitted the Long-Term Plan that describes the measures to remove and dispose of paint containing > 50 ppm PCBs from the interior and portions of the exterior of the ATF air induction piping system; maintain the aluminum clad insulation on the exterior of the piping; and test, inspect and maintain measures that provide protection of GE personnel associated with ATF during jet engine testing operations. The Long-Term Plan was approved by USEPA on February 5, 2014, and was the basis for development of the CAFO that was fully executed by USEPA and GE on April 28, 2014.

3. Remedial Actions

3.1 Introduction

ARCADIS was contracted by GE to complete remedial activities in two "phases" of work in 2013 and 2014 respectively. Work activities were completed as follows:

Phase 1 - 2013 Activities

1. Removal and replacement of approximately 180 linear feet of air induction system piping.
2. Removal of paint containing ≥ 50 ppm PCBs located on the interior of the ATF's air induction system piping (approximately 1,800 feet of pipe).

Phase 1 activities were completed by December 31, 2013.

Phase 2 - 2014 Activities

1. Removal of paint containing ≥ 50 ppm PCBs on the portions of the exterior of the ATF's air induction system (including appurtenances) that were not sheathed in the pipe insulation.

Phase 2 activities were completed by December 31, 2014.

In addition to the above 2013 and 2014 activities, GE and its contractors continue to:

- Maintain (and not disturb) the pipe insulation, which forms a barrier to exposure to any paint that may contain > 50 ppm PCBs that might remain on the exterior of the pipe.
- Maintain the PCB M_L mark placed in appropriate locations, as well as the procedures regarding employee awareness, protection and the management and disposal of PCB-containing waste.

3.2 Characterization Sampling

3.2.1 PCB Air Sampling

USEPA's conditional approval of December 19, 2012 required PCB indoor air monitoring at two locations (within the Test Chamber and Building 518 Compressor Room) during each engine test for a total of four monitoring events. The Long-Term Plan and the CAFO, which were in effect for 2014 jet engine testing, required additional air monitoring pre-, during- and post- engine testing at the same locations identified above. A total of 18 monitoring events were performed during the 2014 calendar year in accordance with the Indoor Ambient Air PCB Monitoring Plan during Engine Testing at the Altitude Test Facility (ARCADIS, 2013). These PCB air monitoring events were conducted over an eight hour interval. Results from these monitoring events were reported to the USEPA; no results exceeded the Recommended Exposure Level (REL) of 1.0 µg/m3. Air testing reports were submitted to

USEPA within 10 business days of receipt of laboratory analyses. Copies of the submitted reports are included in Attachment E.

3.2.2 Asbestos Containing Material (ACM) Paint Chip Sampling and Analyses

At the request of USEPA, paint chip samples were collected from painted surfaces at various locations of the ATF piping network for asbestos-containing material (ACM) analysis in May 2013. The sample locations corresponded with paint samples collected for PCB analyses which included painted piping and associated appurtenances and structural supports that would likely be disturbed during implementation of the Long-Term Plan. The analytical results for the samples, which were all non-detect (ND) for ACM, were summarized in reports to USEPA on May 8, 2013 and June 17, 2013 (included in Attachment I).

3.3 Pipe Removal/Replacement

As referenced in the Long-Term Plan, a portion of elevated pipe along the western side of the ATF was removed and replaced with new stainless steel pipe. A total of 180 linear feet of six foot diameter pipe was removed and replaced.

The original section of piping (scheduled for removal) was encapsulated with the pipe insulation. Because of the presence of ACM within the pipe insulation, a State of Ohio Department of Health (ODH) Notification of an Asbestos Abatement Project was submitted prior to the removal activities, as required under State of Ohio Administrative Code (OAC), Chapter 3701-34.

The pipe insulation removal was performed by an ODH licensed Asbestos Hazard Abatement Contractor (AHAC – C&H Technical Services as a subcontractor to ARCADIS) in accordance with all local, state, and federal regulations. An Ohio Asbestos Hazard Evaluation Specialist (AHES) was on-site during ACM removal activities to perform inspections of each asbestos regulated work area prior to and following abatement activities to ensure that work area preparations and removal activities were in compliance with federal and state regulations and project specific requirements. After final visual inspection of the regulated area, the AHES collected clearance air samples in accordance with OAC § 3701-34-1 prior to allowing the negative pressure enclosures (NPEs) to be dismantled.

Removal activities were conducted in asbestos regulated work areas using NPEs around the piping with scaffolding units. Pipe insulation was removed from the elevated locations at varying intervals, based on field conditions, while the pipe remained in-place. Once the appropriate portion of pipe was exposed, it was cut and removed. The metal jacketing covering the ACM pipe insulation remained in place where the pipe insulation was not

removed. The edges of exposed ACM pipe insulation were encapsulated and sealed with wet amendable cloth to prevent asbestos fiber release.

When ACM remained on the pipe as part of the dismantlement operations, those pipe sections were cut using mechanical means and lowered by crane to the ground onto polyethylene sheeting inside an asbestos regulated work area. Once the section of pipe was secured in-place on the polyethylene sheeting, an NPE was constructed around the sections of pipe and the remaining ACM pipe insulation was abated. When “hot work” was used for pipe removal, the paint was first removed from the interior and exterior of the pipe to prevent any separation of paint during cutting activities.

As the pipe insulation (encapsulating barrier) was removed, pipe segments were sized and then processed (i.e., garnet blasted for paint removal) in accordance with Section 4 of the Long-Term Plan. Removed ACM was managed as PCB-containing TSCA/ACM waste.

3.4 Phase 1 - Paint Removal from the Interior of Pipe

As part of the 2013 remedial activities, PCB-containing paint > 50 ppm was removed from all of the internal surfaces of the duct piping network (1,800 linear feet). Mechanical and/or chemical means were used for removing paint from the interior of pipe. Paint removal was performed utilizing items such as wire wheel tools, hand scrapers, media blasting and chemical agents. The primary method of paint removal was abrasives, using garnet blasting at 125 pounds per square inch (psi) in containment. In the few instances that chemical strippers were used, a product that did not create exothermic reactions (which would affect the chemical stability of the PCBs) was selected (e.g., Citristrip®).

Paint removal operations were completed in a contained environment which ensured PCB-containing paint did not leave the work zone inside the pipe. Confined space entry teams rotated in and out of the pipe to ensure appropriate rest between work efforts. Confined space rescue teams, with required PPE (i.e., helmeted supplied air or half/full face respirator as required, disposable Tyvek suits, gloves, and boot covers), were present and standing by for all permit-required confined space work.

Sections of the ATF piping network designated for paint removal were sealed off to reduce the possibility of paint scrapings and residual paint leaving the work area. Each work area was placed under negative air with high-efficiency particulate arrestance (HEPA) filtration. Paint removed from the steel pipe was collected using dedicated shop vacuums with HEPA filters. Containment areas were placed under negative pressure and equipped with HEPA air filtration units. Following paint removal, exposed surfaces were cleaned. All materials collected from the cleaning efforts inside the air piping were containerized into PCB marked drums and prepared for off-site disposal as PCB TSCA waste.

The paint was removed to meet the Visual Standard No 2, Near-White Blast cleaned surface finish, of the National Association of Corrosion Engineers (NACE) referred to in 40 CFR 761.79 (b)(3)(B). Areas were inspected by a licensed professional engineer (PE) to determine compliance with the visual standard.

3.5 Phase 2 - Paint Removal from the Exterior of Pipe/Appurtenances

PCB-containing paint > 50 ppm on exposed portions of the exterior pipe and appurtenances (i.e., not encapsulated by the pipe insulation) was removed utilizing the same mechanical and chemical removal methods described above. Containment structures were utilized for all activities to reduce the possibility of paint scrapings and residual paint leaving the area. The containment structure included a decontamination chamber attached to the entrance/exit for the removal and disposal of PPE during personnel egress following removal activities. These containment structures were under negative air pressure. After paint removal, exposed surfaces were cleaned prior to removing the containment structures. All cleaning materials collected from the containment structure were containerized in PCB marked drums and prepared for off-site disposal as PCB TSCA Waste.

For elevated portions of this work, crews constructed scaffolding to perform paint removal activities. The scaffolding followed OSHA regulations and site-specific policies for fall protection and working at elevated heights.

The paint was removed to meet the Visual Standard No 2, Near-White Blast cleaned surface finish, of the National Association of Corrosion Engineers (NACE) referred to in 40 CFR 761.79 (b)(3)(B). Areas were inspected by a licensed professional engineer (PE) to determine compliance with the visual standard.

3.6 Operation & Maintenance of Pipe with ACM Insulation and Barrier

While the 180 linear foot section of pipe was removed and replaced, there is approximately 1,320 linear feet of piping encapsulated with the pipe insulation that was not yet removed nor remediated as part of the 2013-2014 efforts. This piping encapsulated with the pipe insulation is being maintained until the exterior portion is remediated (note that all interior portions of piping were remediated in 2013).

The existing pipe insulation prevents any worker exposure to possible PCB-containing paint that is on the surface of the pipe. An Operation & Maintenance (O&M) Plan (Attachment F to the Long-Term Plan) was prepared to serve as the framework for replacing the pipe over time, which would result in the removal of any PCB-containing paint on its surface.

A summary description of the piping that remains encapsulated with the insulation is as follows:

- Approximately 1,500 feet of piping (including 18-inch, 36-inch, 6-foot and 11-foot diameter).
- Approximately 310 feet of this piping is located exterior to the ATF at elevated heights (20-25 feet above grade).
- Approximately 160 feet of piping is semi-enclosed. It runs between the air inlet concrete structures and the main building wall of the ATF. This piping is located beneath elevated steel piping and the infrastructure used to support that elevated piping.
- The balance of the remaining piping, approximately 1,030 feet, is located inside the ATF.

This multi-layered, metal-sheathed insulation on the pipes provides a fixed and rigid encapsulating barrier that prevents exposure to any PCB-containing paint that may be present on the exterior of the pipe. GE continues to inspect and maintain the existing insulation and barrier found on portions of the inlet air pipe to ensure it remains in good condition. Long-term maintenance procedures are outlined in Section F of the Long-Term Plan.

3.7 Inspections & Other Required Actions

GE currently conducts and documents monthly inspections of the air induction piping network in addition to the ongoing monthly PCB M_L marker inspections. The ATF piping network inspection includes a visual inspection of the encapsulating barrier to verify that it is free from damage, including but not limited to, corrosion, water damage, cracks, and/or breakage. These inspections are performed along all accessible portions of the approximate 1,500-foot length of the encapsulated piping. Any damage will be identified on an inspection log and either will be repaired promptly or addressed as part of a pipe or barrier replacement project, as described in the Long-Term Plan. PCB M_L Marker inspection logs are contained in Attachment J.

4. Remaining Work

4.1 Future Pipe Removal (If Any)

Per the requirements outlined in the CAFO, any future pipe removal operations either scheduled or resulting from inspections and recommendations, will require that work be conducted under the following conditions:

1. USEPA notification at least 60 days prior to project commencement;
2. USEPA notification within at least 1-2 business days in the event of an emergency condition requiring a major repair or replacement of pipe;
3. Dispose of removed PCB-containing paint or debris in accordance with Sections 4.3 and 5 of the Long-Term Plan for the ATF;
4. Conduct three indoor ambient air PCB monitoring events per jet engine test at two locations lasting eight hours for at least two engine tests upon completion of each pipe replacement event consistent with Section 3 of the Indoor Air Monitoring Plan (Attachment E). In the event PCB concentrations exceed the NIOSH REL:
   - USEPA shall be notified within 24 hours of receipt of analytical results,
   - Investigate and mitigate the source of the exceedance,
   - Undertake an evaluation of worker safety protections and implement any changes to reduce the potential for exposure;
   - Conduct follow-up air monitoring events to demonstrate air concentrations have been reduced below the REL and provide follow-up in writing to report the monitoring results and actions taken to USEPA within ten business days from receipt of the air monitoring results.
5. All work shall be overseen by GE Environmental Health & Safety personnel for all pipe replacement or repair events.

4.2 Remaining Paint Remedial Activities

GE has elected to commence additional remedial activities associated with the removal of the PCB-containing paint from areas beneath the aluminum clad insulation in 2015. Remedial efforts are identical to those performed in Phases 1 and 2 as described in Section 3. These additional efforts will be referenced as “Phase 3”. Areas remediated in 2015 under Phase 3 will be included in the next annual report submittal to USEPA in April 2016.

5. Waste Management

A total of four waste streams were generated as part of the Phase 1 and 2 remedial efforts as follows:

1. PCB-containing paint chips with garnet from the removal activities
2. ACM from the removal of the aluminum clad pipe insulation layer from portions of the piping network

3. Used PPE
4. Scrap metal steel

Waste streams were managed as follows:

1. TCSA Transport and Disposal (Clean Harbors transportation to EQ in Bellevue, Michigan) – PCB-containing paint chips, ACM and used PPE
2. Scrap Metal Steel (Omnisource transport and recycle at their Lima, OH facility)

Waste documentation records, segregated by waste stream and disposal location, are included in Attachment K.

6. Conclusion

GE Aviation contracted with ARCADIS to complete the Phase 1 and 2 Remedial Activities in accordance with the procedures and deadlines outlined in the CAFO and the Long-Term Plan. GE Aviation is continuing to complete additional remedial activities (referred to herein as Phase 3) in accordance with the terms of the CAFO. As remedial efforts are completed, GE will provide updates to USEPA Region 5 as part of annual report updates.

Attachments

Attachment A

Long-Term Remediation Plan
(without Attachments)

ARCADIS
Infrastructure · Water · Environment · Buildings

General Electric Company

Long-Term Remediation Plan for the Altitude Test Facility (ATF)

GE Aviation, Cincinnati, Ohio

December 2013

Long-Term Remediation Plan for the Altitude Test Facility (ATF)

GE Aviation
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Table of Contents

1. Introduction **1**

2. Background & Overview **4**

2.1 ATF Operations 4

2.2 Interim Plan for Current Testing Operations 4

3. Paint Removal Efforts **6**

3.1 Introduction 6

3.2 Paint Removal from the Interior of Pipe 6

3.3 Paint Removal from the Exterior of Pipe/Appurtenances 7

4. Pipe with ACM Insulation and Barrier **8**

4.1 Introduction 8

4.2 Description of the Insulating Barrier 8

4.3 Pipe Replacement Plans (Including ACM Management Procedures) 9

4.4 Operation and Maintenance Plan For Pipe Encapsulated By The Insulating Barrier 11

4.4.1 Introduction 11

4.4.2 Piping Network Inspections 14

4.4.3 Pipe / Barrier Repair and Replacement 15

5. Waste Management **17**

6. Work Schedule **18**

7. PCB Awareness **19**

8. Maintenance Record Keeping **20**

9. Reporting **21**

9.1 Final Completion Report 21

9.2 Annual Report / Condition Assessment Report 21

Attachments

A GE Aviation Short-Term Section 761.62(c) Submission (November 16, 2012)

B USEPA Region 5 December 19, 2012 Conditional Approval Letter

C Indoor Ambient Air PCB Monitoring Plan

D Asbestos-Containing Material (ACM) Paint Sampling and Analyses

E Multi-Layered Barrier Photos

F O&M Plan

1. Introduction

This Long-Term Remediation Plan (Plan), developed by ARCADIS, U.S., Inc. (ARCADIS) on behalf of the General Electric Company (GE), describes the long-term solution to address the presence of paint containing $\geq$ 50 parts per million (ppm) polychlorinated biphenyls (PCBs) that was discovered on the air induction system at the Altitude Test Facility (ATF) at GE's jet engine manufacturing facility in Cincinnati, Ohio. This Plan abates the risk of potential exposure to PCB-containing paint while also controlling risks associated with potential exposure to asbestos and challenging occupational safety conditions (e.g., working at heights, confined spaces). Ultimately, when managed in accordance with this Plan, the paint in the ATF that contains > 50 ppm PCBs will not pose an unreasonable risk of injury to health or the environment.

The ATF tests jet engines for military and commercial customers. The purpose of the ATF is to test jet engines in conditions that simulate the use of engines at a wide range of altitudes (up to 30,000 feet) and speeds (over 2,000 mph). The ATF is one of only two facilities that exist in the US that has these capabilities (the other is owned and operated by the US Air Force).

On November 16, 2012, the "GE Aviation Short-Term Section 761.62(c) Submission" was submitted to the United States Environmental Protection Agency (USEPA) Region 5 ("GE 2012 Submission;" provided herein as **Attachment A**). In the 2012 Submission, GE proposed to use the ATF for jet engine testing until July 31, 2013, based on the implementation of an interim risk-based alternative solution. On December 19, 2012, USEPA approved the use of the ATF, subject to the interim proposal by GE and certain other conditions ("2012 Approval"; provided as **Attachment B**). Pursuant to Condition 13 of the 2012 Approval, GE submitted an Air Monitoring Plan for interim engine testing operations on January 8, 2013 (provided as **Attachment C**).

The submission of this Plan is in accordance with Condition 17 of the 2012 Approval. The central elements of this Plan are:

- Remove and replace up to 300 feet of air induction system piping.
- Remove paint containing $\geq$ 50 ppm PCBs located on the interior of the remaining portions of the ATF's air induction system piping (approximately 1,500 feet of pipe).

- Remove paint containing ≥ 50 ppm PCBs on the portions of the exterior of the ATF's air induction system, including appurtenances (e.g., valves, flanges, fittings, etc.) that are not sheathed in the aluminum clad/asbestos-containing material (ACM) insulation.

- Maintain (and not disturb) the aluminum cladding and insulation, which forms a barrier to exposure to any PCB-containing paint that might remain on the exterior of the pipe.

- Implement an operation and maintenance plan (O&M plan – **Attachment F**) to periodically assess the condition of the piping for the purpose of determining replacement needs over time (refer to Section 4.4). As the piping is replaced, any PCB-containing paint associated with such piping shall be managed properly and disposed of as PCB Bulk Product Waste.

- Maintain the PCB M_L marker in appropriate locations, as well as the procedures regarding employee awareness and protection, and the management and disposal of PCB Bulk Product Waste. These elements are already in the 2012 Approval.

Essentially, all paint containing ≥ 50 ppm PCBs will be removed from the interior of the piping, and from any portions of the exterior of the piping system and appurtenances not covered by the aluminum clad/ACM insulation. Upon implementation of this Plan, the risk of exposure to any remaining paint on the piping system that might contain ≥ 50 ppm PCBs will have been abated.

GE believes that this Plan is the best risk management strategy. There will be no exposure to PCBs from the interior of the piping and PCB-containing paint on the exterior of the piping to which there may be a current potential for exposure, because such paint will be removed. The multi-layered, metal-sheathed insulation on the pipe, described in more detail in Section 4.2, will continue to provide a several inch thick fixed and rigid encapsulating barrier that prevents exposure to any PCB-containing paint that may remain on the exterior of the pipe.

This rigid encapsulating barrier exceeds the protection provided by the "double wash/rinse/paint" option authorized by USEPA for painted surfaces upon which ≥ 50 ppm liquid PCBs have been spilled [40 CFR § 761.30(p)]. GE recognizes that § 761.30(p) does not apply to the management of non-liquid PCBs embedded in the matrix of paint, and GE is not relying on § 761.30(p) as a legal basis for this plan. Rather, it is being referred to as a technical example to help support the conclusion that

the PCBs in the dried paint matrix that are covered by the several inch thick rigid encapsulating barrier do not pose an unreasonable risk (a barrier more robust than the double layers of contrasting paint set forth in § 761.30(p)).

Additionally, this plan avoids certain known risks related to removal and disposal of ACM insulation and PCB-containing paint as well as the associated technical and safety challenges posed by the size, location and design of the piping network (including a significant amount of work at elevated heights).

2. Background & Overview

2.1 ATF Operations

The ATF is a free-standing facility that contains two engine test cell compartments (referred to as Cells 43 and 44) where engines are mounted in closed cells during the testing phase. Cells 43 and 44 can be used either in a sea-level static mode or in an altitude/speed simulation mode. Through the use of a complex air induction piping network, compressed air may be introduced into the jet engine during testing to simulate speed. By adjusting the flow of compressed air within the test chamber, altitude conditions also can be simulated. The exhaust from the test compartments is routed through two stacks (one for each test cell compartment). The length of any particular test is dependent on the requirements set by the customer, and ranges from a few days to several months. It is important to note that the engine is not operated continuously during the test period. The engine may be operated for different lengths of time under different conditions and subject to periods of downtime while test data is analyzed by the project team.

The piping network consists of a series of primarily six-foot and eleven-foot diameter pipes constructed of 1/4-inch thick, and 3/8-inch thick specialty steel, respectively, that were pre-finished with paint on both the exterior and interior surfaces by the manufacturer/supplier of the piping network. The piping network, which spans a total length of approximately 1,800 linear feet, is encapsulated with a multi-layered insulation barrier consisting of a metal mesh base layer, rigid ACM millboard, and mineral wool, all covered by an aluminum jacket held in place with steel bands. This barrier is described in more detail in Section 4.2 of this Plan. Appurtenances on the piping network are painted, but are not covered with the encapsulating insulation barrier.

2.2 Interim Plan for Current Testing Operations

The interim remedial solution, proposed by GE and approved by USEPA, has been completed. The completed measures are as follows:

- The interior of the air induction piping has been double washed, double rinsed and double painted with contrasting colors of paint.

- GE employees and contractors working in the vicinity of the ATF have been notified of the presence of PCB-containing paint, and adjustments have been made to work practices. Employees have received PCB awareness training,

as well as training specific to new policies on personal protective equipment (PPE) requirements (e.g., Tyvek suits, hand, face, and respiratory protection) when working inside the air pipe.

- PCB M_L markers have been installed at appropriate locations, including all entrance points to the ATF.

- Indoor air testing has been conducted in accordance with the Air Monitoring Plan, and the results of such testing have been provided to USEPA.

- Additional measures were implemented to ensure continued compliance with the interim solution during current testing operations, including:

  - Protection and maintenance of piping insulation as an effective barrier to PCB-containing paint exposure.

  - Care taken to prevent damage to and contact with exposed paint on appurtenances.

3. Paint Removal Efforts

3.1 Introduction

This portion of the Plan describes the means and methods of removal for all exposed (i.e., not covered by the barrier described in Section 4.2 of this Plan) surfaces of the air induction pipe and associated appurtenances coated with PCB-containing paint. PCB-containing paint $\geq$ 50 ppm will be removed from all the internal surfaces of piping and all exposed exterior surfaces of the air induction pipe and appurtenances.

On May 8, 2013, ARCADIS submitted the "Asbestos-Containing Material (ACM) Paint Sampling and Analysis" report to USEPA Region 5. The report summarizes ACM sampling and analyses of the paint from the ATF, which indicated the paint does not contain ACM. A copy of that report (as amended on June 18, 2013) is included as **Attachment D**. To the extent that any of the paint removal activities described in this section have the potential to disturb any ACM, the protective measures described in Section 4.3 will be implemented.

3.2 Paint Removal from the Interior of Pipe

Mechanical and/or chemical means will be used for removing paint from the interior of pipe. These efforts will consist of paint removal items such as wire wheel tools, hand scrapers, media blasting and/or chemical agents. The primary method of paint removal will be abrasives. However, to the extent that chemical strippers are used, only products that will not create exothermic reactions that would affect the chemical stability of the PCBs will be selected. The ingredients of the stripper that might be used have been reviewed (by reviewing the Material Safety Data Sheet and confirming with the manufacturer) and they do not pose a risk of creating an exothermic reaction (e.g., the stripper does not contain methylene chloride).

Paint removal operations will be completed in a contained environment ensuring PCB-containing paint does not leave the work zone inside the air pipe. Confined space entry teams will rotate in and out of the air pipe to ensure appropriate rest between work efforts. Confined space rescue teams, with required PPE (i.e., helmeted supplied air or half/full face respirator as required; disposable Tyvek suits, gloves, and booties), will be present and standing by for all permit-required confined space work.

Sections of the ATF piping network where paint removal is anticipated to occur will be sealed off to reduce the possibility of paint scrapings and residual paint leaving the work area. Paint removed from the steel pipe will be collected using dedicated shop

vacuums with high-efficiency particulate air (HEPA) filters. Containment areas will be placed under negative pressure and equipped with HEPA air filtration units. Following paint removal, exposed surfaces will be cleaned. Any materials collected from the cleaning efforts inside the air piping will be containerized into PCB marked drums and prepared for off-site disposal as PCB Bulk Product Waste.

The paint will be removed to meet the Visual Standard No 2, Near-White Blast cleaned surface finish, of the National Association of Corrosion Engineers (NACE) referred to in 40 CFR 761.79 (b)(3)(B).

3.3 Paint Removal from the Exterior of Pipe/Appurtenances

Removal of exposed (i.e., not encapsulated by the insulating barrier) paint on the exterior of the pipe and appurtenances will utilize the same mechanical and chemical removal methods described in Section 3.2. Containment structures will be utilized for all activities in order to reduce the possibility of paint scrapings and residual paint leaving the area. The containment structure will include a decontamination chamber attached to the entrance/exit for the removal and disposal of PPE during personnel egress following removal activities. These containment structures will be under negative air pressure. Following paint removal, exposed surfaces will be cleaned prior to removal of the containment structures. Any cleaning materials collected from the containment structure will be containerized in PCB marked drums and prepared for off-site disposal as PCB Bulk Product Waste. To the extent that these activities involve the disturbance of ACM, the applicable Federal and State asbestos regulations will be complied with, as discussed in more detail in Section 4.3 of this Plan.

For elevated portions of the pipe and appurtenances, work crews will construct and utilize elevated structures (i.e., scaffolding) to perform paint removal activities. These structures will follow OSHA regulations and site-specific policies for fall protection and working at elevated heights.

4. Pipe with ACM Insulation and Barrier

4.1 Introduction

This portion of the Plan describes provisions for removing specific portions of air induction pipe, and the operation and maintenance plan for the pipe that will remain in place.

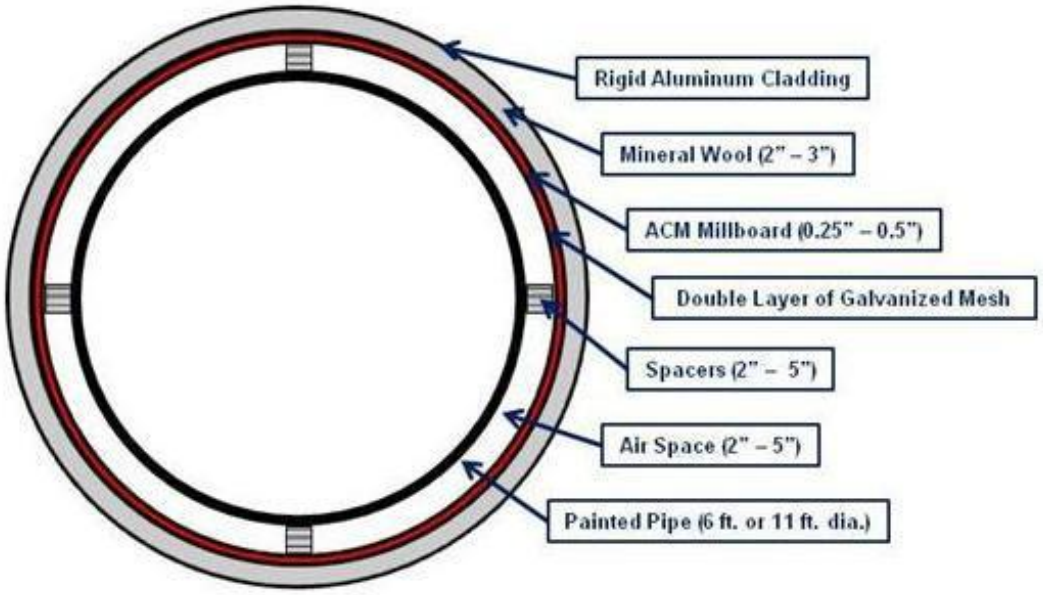
4.2 Description of the Insulating Barrier

Approximately 1,500 feet of the ATF piping network is protected and covered by a multi-layered insulation barrier and aluminum sheathing, effectively encapsulating any PCB-containing paint on the exterior surface of the pipe. This encapsulation provides a barrier preventing any potential contact with the PCB-containing surface, thus preventing any risk to human health or the environment.

This barrier, depicted in Figure 1, consists of the following (interior to exterior):

- “High chairs” or “Spacers” of reinforced steel support the insulating barrier and create 2-5 inches of air space between the exterior of the pipe and the first layer of the barrier.
- The first component of the barrier, 2-5 inches from the pipe, is a double layer of galvanized metal mesh.
- The second layer is comprised of rigid asbestos-containing millboard that is 0.25 to 0.5 inches thick.
- The third layer is mineral wool 2-3 inches thick.
- The final layer is rigid aluminum cladding.

Figure 1 - ATF Multi-Layered Barrier - Detail



Pictures illustrating the barrier are provided in **Attachment E**. This multi-layered, metal-sheathed insulation on the pipe provides a fixed and rigid encapsulating barrier that prevents exposure to any PCB-containing paint that may be present on the exterior of the pipe. GE will inspect and maintain the existing insulation and barrier found on portions of the air pipe to ensure it remains in good condition. The O&M Plan is outlined in Section 4.4 and included in Attachment F.

4.3 Pipe Replacement Plans (Including ACM Management Procedures)

Selected elevated portions of the six foot diameter pipe will be replaced with new steel piping. The piping scheduled for removal and replacement is up to 300 feet in length and located on the western side of the ATF.

The general procedure for pipe removal is as follows:

- Prior to conducting removal activities, GE's designated contractor will submit a State of Ohio Department of Health (ODH) Notification of an Asbestos Abatement Project, as required under State of Ohio Administrative Code

(OAC), Chapter 3701-34, due to the presence of ACM in the encapsulating barrier.

- Pipe insulation will be removed from elevated locations at varying intervals (dependent on field conditions) while the pipe remains in-place. The purpose of this step is to expose the portion of the pipe that will be cut in order to remove it. The metal jacketing covering the ACM pipe insulation will remain in place where the pipe insulation is not removed. Removal activities will be conducted in asbestos regulated work areas by constructing negative pressure enclosures (NPEs) around the piping using scaffolding units. The remaining edges of exposed ACM pipe insulation will be encapsulated and sealed with wet amendable cloth to prevent asbestos fiber release. Alternatively, ACM pipe insulation will be abated along an entire section of piping (in place) using the NPE procedures described above, followed by mechanical cutting and lowering the pipe to the ground via crane (following the ACM abatement).

- In the event any "hot work" is required for pipe removal, paint will be removed from the interior and exterior of the pipe to prevent any separation of paint during cutting activities.

- In general, where ACM remains on the pipe as part of the dismantlement operations, pipe sections will be cut using mechanical means and lowered by crane to the ground onto polyethylene sheeting inside an asbestos regulated work area. Once the section of pipe is secured in-place on the polyethylene sheeting, an NPE will be constructed around the sections of pipe for stripping the remaining ACM pipe insulation.

- Once the encapsulating barrier has been removed, the pipe segments will be sized and processed for disposal as PCB Bulk Product Waste in accordance with Section 5, with the option of managing as scrap metal sections of pipe (or appurtenances) from which the paint has been removed. Waste generated as part of ACM removal activities will be disposed of as PCB-containing ACM waste in accordance with Section 5.

Since the encapsulating barrier contains ACM, additional considerations must be addressed as part of these work activities. Specifically:

- ACM insulation removal will be performed by a ODH licensed Asbestos Hazard Abatement Contractor (AHAC) in accordance with all local, state, and federal regulations, including but not limited to, 40 CFR 61 Subpart M, 29

CFR 1926.1101, and the ODH OAC § 3701-34 and State of Ohio Environmental Protection Agency OAC § 3745-20.

- An Ohio Asbestos Hazard Evaluation Specialist (AHES) will be on-site during ACM removal activities to perform inspections of each asbestos regulated work area prior to and following abatement activities to ensure that work area preparations and removal activities are in compliance with federal and state regulations and project specific requirements. Following final visual inspection of the regulated area, the AHES will collect clearance air samples in accordance with OAC § 3701-34-1 prior to allowing the NPE to be dismantled.

- All persons entering the asbestos regulated work areas shall adhere to the PPE requirements as established by OSHA 29 CFR 1926.1101; specifically Class I operations. The AHAC will be responsible for conducting its own personnel exposure monitoring to demonstrate that they are using the appropriate level of PPE to comply with the OSHA Permissible Exposure Limits (PELs).

4.4 Operation and Maintenance Plan For Pipe Encapsulated By The Insulating Barrier

4.4.1 Introduction

With the exception of the pipe removal project described above, GE plans to maintain the balance of the piping that is encapsulated with the insulating barrier. This will prevent any exposure to possible PCB-containing paint that is on the surface of the pipe, and will abate the risks associated with a wholesale removal of all of the pipe and the ACM-containing insulation. In addition, the O&M Plan (Attachment F) will serve as the framework for replacing the pipe over time, which necessarily will result in the removal of any PCB-containing paint on its surface.

A summary description of the piping that will continue to remain encapsulated with the insulation is as follows:

- Approximately 1,500 feet of piping (including 18-inch, 36-inch, 6-foot and 11-foot diameter).

- Approximately 310 feet of this piping is located exterior to the ATF at elevated heights (20-25 feet above grade).

- Approximately 160 feet of piping is semi-enclosed. It runs between the air inlet concrete structures and the main building wall of the ATF. This piping is located beneath elevated steel piping and the infrastructure used to support that elevated piping.

- The balance of the remaining piping, approximately 1,030 feet, is located inside the ATF.

As described in detail in Section 4.2 above, the insulating barrier completely prevents any exposure to PCB-containing paint that may be on the surface of the pipe underneath the barrier. This rigid encapsulating barrier far exceeds the protection provided by the "double wash/rinse/paint" option authorized by USEPA for painted surfaces upon which > 50 ppm liquid PCBs have been spilled [40 CFR § 761.30(p)] (as noted above, the reference to § 761.30(p) is for technical comparison purposes only, and is not being cited in this Plan as legal authority for the continued use of the encapsulated pipe). Since USEPA already has found that liquid PCBs on the surface of painted surfaces do not pose an unreasonable risk if covered by two layers of paint, then it is reasonable to conclude that non-liquid PCBs contained in a matrix of dried paint, and covered by a several inches thick rigid and metal-clad barrier, do not pose an unreasonable risk. On the other hand, for the reasons described below, removing all of the PCB-containing paint from the exterior of all of the piping does create risks.

The ATF piping network is a very complex system, with much of the system at significant heights and characterized by various turns and angles as it snakes its way through the ATF. Indeed, the ATF roofing systems and building walls were manufactured around the piping system, and the system is intertwined with the infrastructure of the ATF. The pictures in Attachment E are a few examples that illustrate the complexity of the system.

As described above, approximately 310 feet of piping is exterior to the ATF, but at a height of 20-25 feet from the ground. Any substantive work at these heights will require scaffolding and the use of cranes, along with the measures necessary to manage ACM (including enclosing the work areas at height). In addition, paint removal (via media blast) at these heights poses significant safety management challenges due to the force required by media blasting to remove the paint from the pipe; it is the equivalent pressure and force of holding a fire hose with blasting pressures exceeding 100-120 pounds per square inch, while wearing protective clothing and a helmet tethered to breathing hoses, all on a scaffold.

The remaining semi-enclosed piping (160 feet) is comprised of 11-foot diameter pipe fabricated within the concrete walls of the two inlet stacks and the concrete walls of the engine test cells. In addition, an elevated piping network and structural supports above the 11-foot piping (exterior to the building) would require partial building demolition in order to remove or replace the pipe.

Approximately 1,030 feet of piping located within the ATF (enclosed within walls, under roof) is in tight confines, "weaving" through the building (at elevation and at grade) before exiting the building to transfer air to the headworks (or inlet) of the two engine test cells. Based on the duct layout, it appears that the piping network was constructed prior to the construction and installation of the walls and roof of the ATF. Although there are two fairly straight sections of piping within the ATF building (55 feet of 3-foot diameter pipe; 55 feet of 6-foot diameter pipe), one is elevated and both would require partial building demolition and relocating the electrical panel system for the building in order to gain access for pipe replacement. All interior piping currently is protected by the building's walls and roof.

Therefore, determining the presence and extent of any PCB-containing paint on the exterior of these portions of the encapsulated piping, and removing any such paint, should it be detected, effectively would require the demolition of portions of the ATF structure followed by piecemeal dismantling of the entire piping system since many of the pipe surfaces are not accessible in-place (e.g., covered by other piping or building infrastructure). Demolition of the structure and dismantling the piping system poses the following risks:

- Managing ACM removal in a much more complex setting than is presented with the removal of up to 300 feet of pipe described in Section 4.3 (which is itself not a simple project).

- Much of the work would have to be conducted at significant elevations, creating occupational safety risks that would have to be managed carefully.

- The risks posed by working at elevation are compounded by the complexity of the piping system and how it is intertwined with the infrastructure of the ATF.

- Access to significant portions of piping within the ATF structure will require demolition of roof and walls to gain access to the piping network.

Therefore, removing the protective barrier and any PCB-containing paint that may be beneath that barrier will pose immediate known risks. This is in sharp contrast to maintaining the barrier, which not only poses no additional risks, but actually prevents exposure to any PCB-containing paint, and thus eliminates risk. In addition, dismantling certain portions of the piping would require the removal and subsequent replacement of the infrastructure of the ATF, which further would reduce the availability of the ATF for testing jet engines, including jet engines used for purposes of national defense.

4.4.2 Piping Network Inspections

GE will conduct monthly inspections of the air induction piping network in addition to the monthly PCB M_L marker inspections. The ATF piping network inspection will include a visual inspection of the encapsulating barrier to verify that it is free from damage, including but not limited to, corrosion, water damage, cracks, and/or breakage. These inspections will be performed along all accessible portions of the approximate 1,500-foot length of the encapsulated piping. Where necessary, due to elevated piping and/or tight confines, GE will use alternate means (including, but not limited to, man lifts, confined space entry permit, etc.) to gain limited access to the pipe network in order to complete the monthly pipe inspection. Any damage will be identified on an inspection log and either will be repaired promptly or addressed as part of a pipe or barrier replacement project, described in Section 4.4.3.

In addition, prior to conducting an engine test (but no less than monthly), GE conducts a Foreign Object Debris (FOD) inspection of the entire interior of the piping network. In the event that any pipe damage is identified, GE will follow the same procedures as outlined above (i.e., complete an inspection log; promptly repair or address per Section 4.4.3).

In addition to routine monthly visual inspections, the ATF piping network, including the encapsulating barrier, will be subject to a condition assessment by a third-party engineering firm every five years.[1] This assessment will include the following elements:

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[1] American Petroleum Institute – API 570 – "Piping Inspection Code: Inspection, Repair, Alteration, and Rerating of In-service Piping Systems" – 3rd Ed., November 2009, Class 4 rated pipe (non-flammable, non-toxic), which is the class of pipe used at the ATF, requires no inspection interval. However, as a conservative approach, inspections will be conducted on a 5-year interval consistent with Class 1 rated pipe (flammable or pressurized systems).

- A comparison of current conditions to the design parameters of the piping network, including material specifications, design diameters, and wall thickness.

- An evaluation of the operating parameters of the piping network, including design temperature and pressures.

- A description of any modifications, repairs, or significant visual inspection findings since the last assessment.

- An assessment of the piping network's fitness for continued use (e.g., greater than 50% of the pipe wall thickness remains – continued use of the pipe is satisfactory).

- Any recommendations regarding the repair or replacement of portions of the piping system.

The findings from the third-party condition assessment will be summarized in a final report that will be maintained pursuant to Section 8, and be available for USEPA review. The need for any maintenance, repair, or replacement activities identified as a result of the condition assessment will be addressed as a pipe or barrier replacement project as described in Section 4.4.3.

4.4.3 Pipe / Barrier Repair and Replacement

In the event that the existing encapsulating barrier is damaged and must be replaced, appropriate GE Environmental Health and Safety (EHS) personnel will oversee the replacement operations. In general, the repair or replacement of the encapsulating barrier will be performed by an ODH licensed AHAC, with appropriately certified personnel, to perform the abatement work. Work will be conducted in accordance with Section 4.3. Under no circumstances will torch cutting or flame emitting devices be used when removing or repairing the insulating barrier. Waste generated by the barrier or PCB painted pipe repair or removal activities will be managed in accordance with Section 5.

Future pipe replacement efforts, including those arising from the inspections and recommendations described in Section 4.4, will be coordinated and overseen by GE EHS personnel. USEPA will be notified of any pipe replacement project at least 60 days prior to the commencement of such project. Such a notification will identify the portions of the pipe intended to be replaced and the process for removing such pipe,

including applicable measures to protect human health and the environment. In the event of an emergency condition requiring a major repair or replacement of pipe, the work will be conducted immediately; USEPA will be notified of the work within 1-2 business days. Minor repairs to the pipe will be completed per GE's on-site standard operating procedures (SOPs) with no USEPA notification. Prior to disconnecting the pipe from the network, the encapsulating barrier surrounding the disconnection point will be abated per the procedure outlined in Section 4.3. All waste generated as a part of pipe replacement activities will be managed in accordance with Section 5. Documentation (e.g., waste manifests, bills of lading and/or certificates of disposal) will be maintained by GE as part of the record keeping program described in Section 8.

The overall condition of the ATF building is good and the building is regularly maintained. There are no additional renovations, retooling or demolition plans at the ATF building beyond the pipe replacement project currently being conducted.

5. Waste Management

Wastes generated from the activities subject to this Plan will be treated as PCB Bulk Product Waste, and disposed of in accordance with Toxic Substances Control Act (TSCA) requirements, with the option that metal from which paint has been removed may be managed as scrap metal. In addition, any asbestos waste generated will be handled and disposed of in accordance with ACM regulations, as well as TSCA requirements.

Maintenance of all records and documents will be kept in one centralized location as required by 40 CFR § 761, including, but not limited to, the records required under Subparts J and K. All records will be available for inspection by authorized representatives of the USEPA.

6. Work Schedule

The interim jet engine testing being conducted in accordance with the 2012 Approval will be completed by July 31, 2013. This Long-Term Plan will be completed by December 31, 2014 pursuant to the following schedule:

- The removal and replacement of up to 300 feet of the air induction system piping will be completed by February 1, 2014.

- The removal of paint containing > 50 ppm PCBs located on the interior of the remaining portions of the air induction system piping (approximately 1,100 feet of pipe) will be completed by February 1, 2014.

- The removal of paint containing > 50 ppm PCBs on the portions of the exterior of the ATF's air induction system piping and appurtenances that are not sheathed in the aluminum clad/ACM insulation will be completed by no later than December 31, 2014.

  - Jet engine testing will re-commence only when paint removal from the interior of the piping is completed. This currently is anticipated to occur ahead of the scheduled February 1, 2014 date, which will allow engine testing to re-commence in January, 2014. No jet engine testing will occur until the remediation of the interior surfaces, and the removal and replacement of the 300-foot section of the air induction system piping is completed. Air monitoring will be conducted in accordance with Attachment C before jet engine testing re-commences. In the event that the work on the exterior of the piping and appurtenances is not completed by the time jet engine testing re-commences, the remainder of the work will be completed no later than December 31, 2014. Any engine testing occurring between the time that the work on the interior of the pipe is completed and December 31, 2014 will be conducted in accordance with the conditions in the 2012 Approval.

7. PCB Awareness

Pursuant to the 2012 Approval, GE installed more than forty PCB M_L markers at appropriate locations throughout the ATF. The markers serve to inform personnel entering and/or performing work in the facility that there are PCBs present that require special handling and disposal in accordance with 40 CFR § 761. The markers are posted at exterior entrances, access points, and exterior pipe locations (e.g., elevated stairways, catwalks, overhead doors, entrances, ductwork, etc.). PCB M_L markers will be maintained throughout the execution of the Plan. Following the completion of the paint removal activities of the Plan, the location and quantity of PCB M_L markers will be updated. Where PCB M_L markers are to remain, GE will continue to conduct monthly inspections of the markers to verify that each marker is intact, in good condition, and that all information, including contact name and phone number, is visible.

In addition to installing PCB M_L markers throughout the ATF, GE has implemented a PCB awareness program for GE employees and contractors working in the vicinity of the ATF. This program consists of notifying personnel of the presence of PCB-containing paint on the ATF air induction system piping and includes a training session for targeted personnel who perform work activities in and around the ATF (e.g., maintenance, inspections, etc.). Approximately twenty two (22) people (Test Operations, Engineers, Maintenance, etc.) work at different times within the ATF buildings, with each worker totaling approximately 400 hours annually. Most of those work activities involve monitoring engine test runs from control rooms, while work within the engine test cells includes test preparation, equipment inspection and maintenance, and test shutdown. The training session includes an overview of PCBs, the regulatory considerations surrounding their use, and the nature and extent of PCB concentrations detected in the ATF. Furthermore, the training covers the PPE SOP and waste management SOP for the ATF.

Although the implementation of the Plan will eliminate the risk of exposure to any PCB-containing paint, GE will continue its PCB awareness program as a preventative measure and for any future pipe maintenance and/or replacement with the potential to expose personnel to PCB-containing paint. Training sessions will be held for new employees and annual refresher training will be provided to existing workers who work within and in the vicinity of the ATF.

8. Maintenance Record Keeping

GE shall maintain records relating to the maintenance of the ATF air induction system described above. These records will include, but will not be limited to, the following:

- PCB M_L marker inspection logs.
- PCB awareness training records.
- Pipe inspection logs.
- Reports of piping system assessments conducted by the third-party engineering firm.
- Updated as-built drawing of the ATF system, revised as pipe changes/replacements occur over time.
- Copies of manifests, bills of lading and/or certificates of destruction for pipe removal/replacement, as applicable.

9. Reporting

9.1 Final Completion Report

GE will submit a single Final Completion Report to the USEPA Region 5 PCB Coordinator within 120 days of the completion of activities subject to this Plan (with the exception of on-going operation and maintenance activities described in Section 4.4), which also will include the information required by Condition 22 of the 2012 Approval (GE believes that it may simplify USEPA's review to receive one report rather than two). At a minimum, the Report will include the following:

- Summary package of data tables, figures, and laboratory analytical documentation for sampling that has been conducted at the ATF for the purpose of PCB-containing paint remediation.

- Indoor air sampling analytical results, including copies of accompanying analytical chains of custody and field and laboratory quality control/quality assurance checks.

- A brief narrative describing the activities performed, including any deviations from the Plan or GE 2012 Submission and Approval. This narrative will include the method employed during interim cleanup, paint removal, and pipe removal/replacement activities; the location, quantity, and extent of paint removal; the location of pipe removal; quantity of waste generated; waste disposal documentation; PPE worn; methods and devices for ensuring health and safety during all work activities; and decontamination procedures.

- Copies of all waste manifests, bills of lading, and/or certificates of disposal, with an associated summary table broken down by waste type.

9.2 Annual Report / Condition Assessment Report

GE will submit an annual letter report to the USEPA Region 5 PCB Coordinator, summarizing pipe removal and replacement projects from the previous year, if any (report to be submitted by March 15th of the subsequent year). Annual reports will continue to be submitted to USEPA until the remaining piping network has been replaced or the ATF facility undergoes decommissioning/demolition (whichever occurs first). In addition, the third party pipe condition assessment reports will be submitted to USEPA as an attachment to the annual report (every 5 years).

Attachment B

Consent Agreement & Final Order

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

APR 28 2014

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Chris Bell
Greenberg Traurig, LLP
1000 Louisiana Street, Suite 1700
Houston, Texas 77002

Re: Consent Agreement and Final Order
General Electric Company
Docket No: **TSCA-05-2014-0008**

Dear Mr. Bell:

Enclosed please find an original signed fully-executed Consent Agreement and Final Order (CAFO) in resolution of the above case. The original was filed on April 28, 2014, with the Regional Hearing Clerk (RHC).

Please pay the civil penalty in the amount of $52,495 in the manner prescribed in paragraph(s) 44-49 of the CAFO, and reference all checks with the docket number **TSCA-05-2014-0008**. Your payment is due within 30 calendar days of the effective date of the CAFO. Also, enclosed is a *Notice of Securities and Exchange Commission Registrant's Duty to Disclose Environmental Legal Proceedings*. Thank you for your cooperation in resolving this matter.

Sincerely,

Jose G. Cisneros, Chief
Remediation and Reuse Branch

Enclosures

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on 100% Recycled Paper (100% Post-Consumer)

NOTICE OF SECURITIES AND EXCHANGE COMMISSION REGISTRANTS' DUTY TO DISCLOSE ENVIRONMENTAL LEGAL PROCEEDINGS

Securities and Exchange Commission regulations require companies registered with the SEC (e.g., publicly traded companies) to disclose, on at least a quarterly basis, the existence of certain administrative or judicial proceedings taken against them arising under Federal, State or local provisions that have the primary purpose of protecting the environment. Instruction 5 to Item 103 of the SEC's Regulation S-K (17 CFR 229.103) requires disclosure of these environmental legal proceedings. For those SEC registrants that use the SEC's "small business issuer" reporting system, Instructions 1-4 to Item 103 of the SEC's Regulation S-B (17 CFR 228.103) requires disclosure of these environmental legal proceedings.

If you are an SEC registrant, you have a duty to disclose the existence of pending or known to be contemplated environmental legal proceedings that meet any of the following criteria (17 CFR 229.103(5)(A)-(C)):

A. Such proceeding is material to the business or financial condition of the registrant;
B. Such proceeding involves primarily a claim for damages, or involves potential monetary sanctions, capital expenditures, deferred charges or charges to income and the amount involved, exclusive of interest and costs, exceeds 10 percent of the current assets of the registrant and its subsidiaries on a consolidated basis; or
C. A governmental authority is a party to such proceeding and such proceeding involves potential monetary sanctions, unless the registrant reasonably believes that such proceeding will result in no monetary sanctions, or in monetary sanctions, exclusive of interest and costs, of less than $100,000; provided, however, that such proceedings which are similar in nature may be grouped and described generically.

Specific information regarding the environmental legal proceedings that must be disclosed is set forth in Item 103 of Regulation S-K or, for registrants using the "small business issuer" reporting system, Item 103(a)-(b) of Regulation S-B. If disclosure is required, it must briefly describe the proceeding, "including the name of the court or agency in which the proceedings are pending, the date instituted, the principal parties thereto, a description of the factual basis alleged to underlie the proceedings and the relief sought."

You have been identified as a party to an environmental legal proceeding to which the United States government is, or was, a party. If you are an SEC registrant, this environmental legal proceeding may trigger, or may already have triggered, the disclosure obligation under the SEC regulations described above.

This notice is being provided to inform you of SEC registrants' duty to disclose any relevant environmental legal proceedings to the SEC. This notice does not create, modify or interpret any existing legal obligations, it is not intended to be an exhaustive description of the legally applicable requirements and it is not a substitute for regulations published in the Code of Federal Regulations. This notice has been issued to you for information purposes only. No determination of the applicability of this reporting requirement to your company has been made by any governmental entity. You should seek competent counsel in determining the applicability of these and other SEC requirements to the environmental legal proceeding at issue, as well as any other proceedings known to be contemplated by governmental authorities.

If you have any questions about the SEC's environmental disclosure requirements, please contact the SEC Office of the Special Senior Counsel for Disclosure Operations at (202) 942-1888.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

IN THE MATTER OF:	)	Docket No. TSCA-05-2014-0008
	)	
GENERAL ELECTRIC COMPANY	)	Proceeding to Assess a Civil Penalty
EVENDALE, OHIO	)	Under Section 16 (a) of the Toxic
	)	Substance Control Act
	)	15 U.S.C. § *1361(a)*
Respondent.	)	
	)	

REGIONAL HEARING CLERK
RECEIVED
APR 28 2014
U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 5

CONSENT AGREEMENT AND FINAL ORDER
COMMENCING AND CONCLUDING A PROCEEDING

I. PRELIMINARY STATEMENT

1. This is an administrative proceeding commenced and concluded under Section 16(a) of the Toxic Substances Control Act (TSCA), 15 United States Code (U.S.C.) § 2615(a), and Sections 22.1(a)(5), 22.13(b), and 22.18(b)(2) and (3) of the *Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination of Suspension of Permits* (Consolidated Rules), as codified at 40 Code of Federal Regulations (C.F.R.) Part 22.

2. The Complainant is, by lawful delegation, the Director of the Land and Chemicals Division, United States Environmental Protection Agency (EPA), Region 5.

3. The Respondent is General Electric Company (Respondent or GE), a corporation doing business in the State of Ohio.

4. The parties agree that settling this action without the filing of a complaint or the adjudication of any issue of fact or law is in their interest and in the public interest.

5. Respondent consents to the assessment of the civil penalty specified in this Consent Agreement and Final Order (CAFO), and to the terms of this CAFO.

II. JURISDICTION AND WAIVER OF RIGHT TO HEARING

6. Respondent admits the jurisdictional allegation in this CAFO and neither admits nor denies the factual allegations in the CAFO.

7. Respondent waives its right to request a hearing as provided at 40 C.F.R. § 22.15(c), any right to contest the allegation in this CAFO, and its rights to appeal this CAFO.

III. ALLEGED VIOLATION

A. Background

8. Respondent is the owner and operator of the GE Aviation Facility in Evendale, Ohio that designs, develops, manufactures, and tests jet engines for military and commercial customers.

9. Respondent operates an engine test facility known as the Altitude Test Facility (ATF) located at the GE Aviation Facility. The purpose of the ATF is to test jet engines in conditions that simulate the use of the engines at a wide range of altitudes.

10. The ATF is a free-standing building that contains two engine test cell compartments. Through the use of an air induction piping network, compressed air is introduced into the test compartments where the jet engines are mounted during testing to simulate speed or altitude conditions.

11. The air induction piping network consists of a series of primarily six-foot and eleven foot diameter piping constructed of ¼-inch thick and 3/8-inch thick specialty steel, including appurtenances (e.g., valves, flanges, fittings, etc.), that were pre-finished with paint on both the interior and exterior and installed in the late 1960s. The piping network spans a

total length of approximately 1,800 linear feet and is encapsulated with a multi-layered insulation barrier consisting of a metal mesh base layer, rigid asbestos-containing material (ACM) millboard and mineral wool, all that is covered by an aluminum jacket held in place with steel bands ("aluminum clad insulation").

12. On November 1, 2012, Respondent voluntarily disclosed to EPA that paint coating the piping network contained more than 50 milligrams per kilogram ("mg/kg") Polychlorinated Biphenyls ("PCB"). This disclosure was based on sampling data received by Respondent on October 26, 2012. Respondent stopped operational activities relating to testing jet engines at the ATF on October 26, and on November 16, 2012 petitioned EPA for an interim risk-based alternative cleanup solution to address the PCB-containing paint.

13. In response to Respondent's petition for an interim risk-based alternative clean-up solution to address the presence of PCB containing paint discovered in Respondent's air induction system, on December 19, 2012 EPA issued an Approval to Respondent to address the PCB contamination under 40 C.F.R. § 761.62 (c) for the limited purpose of conducting four engine tests in the ATF on behalf of the Department of the Navy. This Approval included a number of corrective measures to be completed by Respondent before testing could resume, including double washing, rinsing and painting the interior of the piping system, conducting indoor air testing, placing PCB M_L markers in appropriate locations throughout the ATF, and conducting training and awareness sessions for ATF personnel.

14. After receipt of this Approval and completion of the corrective measures required by the Approval, Respondent resumed testing activities at the ATF in accordance with the Approval, including the condition that such testing must be completed by July 31, 2013. After the jet engine testing was completed, Respondent then began implementing additional

remedial and corrective measures at the ATF. The Approval was amended on January 16, 2014 in order to allow GE to resume jet engine testing between January 1 and April 30, 2014 and to provide the parties opportunity to finalize negotiation of this CAFO.

15. Condition 17 of the attachment to EPA's December 19, 2012 Approval required Respondent to propose a long-term solution to EPA for the removal and disposal of the PCB containing paint in the air induction system. In December 2013, Respondent submitted a proposal (Attachment A) that EPA considered and that forms, in part, the basis for the long term measures addressed in Section IV of this CAFO.

B. General Allegations

16. The PCB Disposal and Marking regulations were lawfully promulgated pursuant to Section 6(e) of TSCA, 15 U.S.C. § 2605(e), on February 17, 1978 (43 Fed. Reg. 7150). The PCB Manufacturing, Processing, Distribution in Commerce and Use Regulations (PCB Rule) were lawfully promulgated on May 31, 1979 (44 Fed. Reg. 31514) and incorporated the disposal and marking regulations. The PCB rule was subsequently amended and partially recodified at 40 C.F.R. Part 761.

17. The air induction piping in Respondent's ATF is not a "PCB Container," as defined at 40 C.F.R. § 761.3, because it is not a package, can, bottle, bag, barrel, drum, tank or other device that contains the PCBs or PCB Articles and whose surface(s) has been in direct contact with PCBs.

18. The air induction piping in Respondent's ATF is a "PCB Article," as defined at 40 C.F.R. § 761.3, because it is a manufactured article, other than a PCB Container, that contains PCBs and whose surface(s) has been in direct contact with PCBs.

19. The air induction piping in Respondent's ATF is a "PCB Item," as defined at 40 C.F.R. § 761.3, because it is a PCB Article that deliberately or unintentionally contains or has as a part of it any PCB or PCBs.

20. On November 1, 2012, GE informed EPA that it had received sampling data indicating that the paint originally applied on the ATF air induction piping network by the manufacturer of the network before the enactment of TSCA contained greater than 50 mg/kg PCBs. The summary of the PCB sampling data GE provided to EPA on November 6, 2012 revealed the following concentrations of PCBs:

Interior Pipe Surfaces

- 53 wipe samples – results ranging from non-detectable (ND) to 10.0 micrograms per 100 square centimeters (μg/100 cm^2)
- 30 paint chip samples – results ranging from ND to 42,000 mg/kg.

Exterior Pipe Surfaces

- 42 wipe samples – results ranging from ND to 2,900 μg/100 cm^2.
- 29 paint chip samples – results ranging from ND to 100,000 mg/kg.

Air Monitoring

- 2 locations inside the pipe – ND and 125 nanograms per cubic meter (ng/cm^3)
- 2 locations in the ATF – ND and 83.3 ng/cm^3.

21. Respondent is not using the air induction piping in its ATF in a "totally enclosed manner," as defined at 40 C.F.R. § 761.3 because the air induction piping is not being used in a manner that will ensure no exposure of human beings or the environment to any concentration of PCBs.

C. Specific Allegation: Unauthorized Use of PCBs

22. The General allegations above are incorporated by reference as though set forth here in full.

23. 40 C.F.R. § 761.20(a) provides that no person may use any PCB, or any PCB Item regardless of concentration, in any manner other than in a totally enclosed manner within the United States unless authorized under 40 C.F.R. § 761.30.

24. 40 C.F.R. § 761.30 does not authorize the use of paint that contains $\geq$ 50 mg/kg PCB, and thus Respondent is not authorized to use the air induction piping coated with paint containing $\geq$ 50 mg/kg in the ATF.

IV. Conditional Long Term Use of the Air Induction System

A. General

25. Respondent has contracted with, and expects to be asked to contract with, various governmental defense agencies and corporate entities to test aircraft engines at Respondent's ATF. This CAFO prescribes the manner in which Respondent may use the ATF to conduct aircraft engine testing. Accordingly, Complainant has determined that activities in the ATF related to engine testing must be conducted in accordance with the following conditions, which are established to ensure there is no unreasonable risk of PCB exposure to the environment or to any personnel in the ATF during its use for aircraft engine testing.

26. EPA has determined that there will be no unreasonable risk of PCB exposure to the environment or to any personnel in the ATF during these activities, based on the following activities:

a. The results of air sampling data submitted prior to and in accordance with the December 19, 2012 TSCA Approval.

b. The removal and replacement of up to 300 linear feet of air induction system piping.

c. The removal of paint containing ≥ 50 mg/kg PCBs located on the interior of the remaining portions of the ATF's air induction system piping (approximately 1,500 linear feet of pipe).

d. The removal by December 31, 2014 of paint containing ≥ 50 mg/kg PCBs on the portions of the exterior of the ATF's air induction system, including appurtenances (e.g., valves, flanges, fittings, etc.) that are not sheathed in the aluminum clad insulation.

e. The existence of the aluminum clad insulation, which forms a barrier to exposure to any PCB-containing paint that might remain on the exterior of the pipe.

f. The implementation of an operation and maintenance plan to periodically assess the condition of the piping including the aluminum clad insulation for the purpose of determining replacement needs over time. As this piping and/or aluminum clad insulation are replaced, any PCB-containing paint associated with the piping shall be managed properly and disposed of as PCB Bulk Product Waste in accordance with Paragraph 38.

g. The inspection and maintenance of the PCB M_L markers pursuant to 40 C.F.R. §761.30(p)(1)(iii)(B) and as identified in Sections 4.4.2 and 7 of Attachment A.

h. The procedures regarding employee awareness and protection, and the management and disposal of PCB Bulk Product Waste as identified in Sections 5 and 7 of Attachment A.

i. The use of the ATF is: 1) limited to specific activities; 2) public access is restricted; and 3) the amount of time any person spends in the open internal space of the ATF is limited.

j. The additional conditions below will limit exposure further, and generate monitoring data and information for the ATF.

27. The conditions in Section B. through H, below, may be amended by written agreement between the Chief of EPA, Region 5, Remediation and Reuse Branch and Respondent under the authority of this Consent Agreement upon receipt and consideration of additional information.

B. Applicability

28. The conditions in this Consent Agreement apply to the use of the ATF for the testing of aircraft engines. The conditions do not apply to Respondent's use of facilities other than the ATF located at GE's Evendale, Ohio, plant.

C. Access to the ATF for Engine Testing Purposes

29. Access to the ATF shall be limited to authorized personnel only.

30. Access to the ATF shall be controlled and limited typically to: (a) personnel planning, executing and evaluating aircraft engine tests and (b) personnel conducting inspections, air sampling, remediation and/or maintenance. Authorized visitors, including government officials, vendors and others with a business purpose at the ATF, may be authorized to visit the ATF for short periods of time when accompanied by authorized

personnel, as long as indoor air sampling conducted under paragraph 34 demonstrate that PCB concentrations are below 1 $\mu g/m^3$.

31. Respondent has installed PCB M_L markers at appropriate locations throughout the ATF, including all entrance points, which shall be maintained in place throughout the useful life of the ATF as long as PCBs remain present in the ATF as described below. The markers serve to inform personnel entering and/or performing work in the facility that there are PCBs present that require special handling and disposal in accordance with 40 C.F.R. Part 761. The M_L markers are posted at exterior entrances, access points, and exterior pipe locations (e.g., elevated stairways, catwalks, overhead doors, entrances, ductwork, etc.). M_L Marks will be used to designate ATF induction piping material that has yet to be decontaminated. Following the completion of any paint removal activities, the location and quantity of PCB M_L markers will be updated. Where PCB M_L markers are to remain, GE will continue to conduct monthly inspections of the markers to verify that each marker is intact, in good condition, and that all information, including contact name and phone number, is visible as described in Sections 4.4.2 and 7 of Attachment A. No later than February 9, 2015, Respondent shall provide to the PCB Coordinator, at the address provided in paragraph 36.c. a map identifying the location of M_L markers in the ATF as of January 15, 2015.

D. Health and Safety

32. Respondent will implement the PCB awareness program as described in Section 7 of Attachment A for GE employees and contractors working at the ATF. This program consists of notifying personnel of the presence of PCB-containing paint on the ATF air induction system piping and includes a training session for targeted personnel who perform work activities in and around the ATF (e.g., maintenance, inspections, etc.). The training

session includes an overview of PCBs, the regulatory considerations surrounding their use, and the nature and extent of PCB concentrations detected in the ATF. Furthermore, the training covers the Personal Protective Equipment (PPE) Standard Operating Procedure (SOP) and waste management SOP for the ATF. GE will continue its PCB awareness program as a preventative measure and for any future pipe maintenance and/or replacement with the potential to expose personnel to PCB-containing paint. Training sessions will be held for new employees and annual refresher training will be provided to existing workers who work within and in the vicinity of the ATF. GE will notify EPA of any updates or changes to this training.

33. This CAFO is not intended to relieve GE of its obligation to comply with all applicable regulations and requirements for health and safety administered by the Occupational Safety and Health Administration.

E. Monitoring During Engine Tests

34. Indoor Air (stationary) Monitoring: Respondent will conduct stationary air monitoring as described in the Air Monitoring Plan of the Long-Term Remediation Plan (Attachment A) during calendar year 2014.

35. Sample Collection and Analysis: All stationary air monitoring required by this CAFO must be conducted using USEPA Compendium Method TO-10A and as described in Section 3 of the Air Monitoring Plan of Attachment A. In particular, Respondent shall determine a sample volume by adjusting the flow rate and sampling time that will result in measurements in the operating range of the analytical instrument to be used.

36. Reporting Results of Monitoring:

a. Respondent shall report the results of the indoor air monitoring for PCBs to EPA via letter report within ten (10) business days from receipt by GE of the report from the laboratory as described in Section 6 of the Air Monitoring Plan of Attachment A. The letter report must include the sampling time, the flow rate, the volume of air sampled, any sample breakthrough, the final extract volume, the injection volume, and the operating parameters of the analytical instruments used. In addition, Respondent must report the location of the monitors, the type of activity being conducted during monitoring, and the proximity of the monitors to the activity.

b. Should any air monitoring event result show that air concentration of total PCB exceeds the NIOSH Recommended Exposure Limit (REL; 1 microgram per cubic meter (1 $\mu g/m^3$) Time Weighted Average (TWA); 1000 nanograms per cubic meter TWA), GE will notify EPA within 24 hours of receipt of analytical results, investigate the circumstances, and, where possible, identify and mitigate the source of the exceedance. GE also will undertake an evaluation of worker safety protections including the need for respirator protection, and implement any feasible changes in procedures or environmental controls necessary to reduce the potential for exposure at or above the NIOSH REL. In addition, GE will conduct follow-up monitoring events to demonstrate that air concentrations have been reduced below the REL, and report the results and actions taken to EPA in a follow-up letter report within ten (10) business days from receipt by GE of the results of such follow-up monitoring from the laboratory in accordance with Paragraph 36.a. Until such time

as air concentrations of PCBs have been demonstrated to be below the REL, personnel conducting activities in the ATF, including engine testing, must wear the personal protective equipment described in Paragraph 37. Outcomes of corrective actions, including the results of any air re-sampling, must also be included in the Annual Report developed per Attachment A.

c. Respondent must submit its reports to the PCB Coordinator, U.S. EPA, Region 5, mailstop LU-9J, 77 West Jackson Boulevard, Chicago, Illinois 60604. The reports of sampling events above 1 $\mu g/m^3$ should be reported to the PCB Coordinator within 24 hours. Complainant may designate another contact and will notify Respondent within 7 working days if such designation occurs.

F. Personal Protection Equipment

37. If there is any finding under Paragraph 36(b) that airborne PCB concentrations over 1 $\mu g/m^3$ are present in the air, personnel, involved in subsequent workshift activity of a kind that resulted in that finding, shall wear a half-face air purifying respirator (OSHA/NIOSH approved) with combination organic vapor and HEPA cartridges until it is demonstrated, through air testing, that airborne concentrations over 1 $\mu g/m^3$ are not present.

G. Pipe Removal and Disposal

38. The estimated 300 feet of piping identified for removal and replacement is located on the western side of the ATF and will be managed as per Sections 4.3 and 5 of the Long Term Remediation Plan for the ATF located in Attachment A.

39. All removed PCB containing paint or debris will be managed as described in Sections 4.3 and 5 of Attachment A.

40. All metal surfaces coated with PCB paint will be decontaminated to meet the Visual Standard No. 2 Near-White Blast cleaned surface finish of the National Association of Corrosion Engineers (NACE) referred to in 40 C.F.R. §761.79(b)(3)(B) prior to management as scrap metal.

H. Schedule For Future ATF Activities

41. Future pipe replacement efforts, including those arising from the inspections and recommendations described in Section 4.4.2 of Attachment A, will be overseen by GE Environmental Health & Safety personnel. GE will notify EPA of any pipe replacement project at least 60 days prior to the commencement of such project. Such a notification will identify the portions of the pipe intended to be replaced and the process for removing such pipe, including applicable measures to protect human health and the environment. In the event of an emergency condition requiring a major repair or replacement of pipe, the work will be conducted immediately; EPA will be notified of the work within 1-2 business days. All removed PCB-containing paint or debris will be disposed of in accordance with Paragraph 39. GE shall conduct indoor ambient air PCB monitoring upon the completion of each pipe replacement event for at least two engine tests, consistent with all the program elements set forth in Section 3 of Attachment C (Air Monitoring Plan) of GE's Long-Term Remediation Plan for the ATF (Attachment A of this CAFO), to confirm that ambient air levels of PCBs within the ATF do not exceed the NIOSH REL specified in Paragraph 36.b., above. Consistent with Section 3 of the Air Monitoring Plan, GE shall conduct three sampling events per jet engine test at two locations, and each sampling event will last eight hours. In addition, GE shall use the sampling methods and analytical methods prescribed in Section 3 of the Air Monitoring Plan. If any air monitoring event result demonstrates that air

concentrations of total PCBs exceed the NIOSH REL, GE will comply with the requirements set forth in Paragraph 36.b., above.

V. Civil Penalty

42. Section 16 (a)(2)(B) of TSCA, 15 U.S.C. § 2615 (a)(2)(B), requires the Administrator to consider the nature, circumstances, extent and gravity of the violation(s) and, with respect to the violator, ability to pay, effect on ability to continue in business, any history of such prior violations, the degree of culpability and such other matters as justice may require.

43. Based on an evaluation of the facts alleged in this CAFO and the factors in Section 16(a)(2)(B) of TSCA, Respondent's cooperation and willingness to promptly return to compliance, Complainant has determined that an appropriate civil penalty to settle this action is $52,495.

44. Within 30 days of the effective date of this CAFO, Respondent must pay the $52,495 civil penalty for the TSCA violation. Respondent must pay the penalty by sending a check, payable to the "Treasurer, United States of America," to:

U.S. EPA
Fines and Penalties
Cincinnati Finance Center
P.O. Box 979077
St. Louis, MO 63197-9000

45. The check must note "In the Matter of General Electric Company" and the docket number of this CAFO.

46. A transmittal letter stating Respondent's name, complete address, the case title, the case docket number and the billing document number must accompany the payment. Respondent must send a copy of the check and the transmittal letter to:

Regional Hearing Clerk (E-19J)
U.S. EPA, Region 5
77 W. Jackson Blvd.
Chicago, IL 60604

Kendall Moore (LC-8J)
Pesticides and Toxics Compliance Section
U.S. EPA, Region 5
77 W. Jackson Blvd.
Chicago, IL 60604

Susan Perdomo (C-14J)
Office or Regional Counsel
U.S. EPA, Region 5
77 W. Jackson Blvd.
Chicago, IL 60604

47. This civil penalty is not deductible for federal tax purposes.

48. If Respondent does not pay timely the civil penalty, EPA may refer the matter to the Attorney General who will recover such amount (plus interest at currently prevailing rates) by action in the appropriate United States District Court and in such an action, the validity, amount and appropriateness of the civil penalty are not reviewable, Section 16(a)(4)(B) of the TSCA, 15 U.S.C. § 2615(a)(4)(B).

49. Pursuant to 31 C.F.R. § 901.9, Respondent must pay the following on any amount overdue under this CAFO. Interest will accrue on any amount overdue from the day payment was due at a rate established by the Secretary of the Treasury. Respondent must pay a $15 handling charge each month that any portion of the penalty is more than 30 days past due. In addition, Respondent must pay a 6 percent per year penalty on any principle amount 90 days past due.

VI. Stipulated Penalties

50. If Respondent fails to comply with any requirement of the CAFO, excluding the requirements under Section V (Penalty), Complainant may impose stipulated penalties as follows:

a. Reports of Monitoring Results. For failure to submit to Complainant in a timely manner the results and reports required under paragraphs 36.a. through c. inclusive, above, Complainant may require Respondent to pay:

Period of Noncompliance	Penalty per day
i. Days 1-15 of noncompliance	$500
ii. Days 16-30 of noncompliance	$1,000
iii. Each day after day 30	$5,000

b. All other CAFO Requirements: For any other failure to comply with the requirements of Paragraphs 29 through 35, inclusive, above, and Paragraphs 37 through 41, inclusive, above, Complainant may require Respondent to pay:

Period of Noncompliance	Penalty per day
i. Days 1-15 of noncompliance	$2,500
ii. Days 16-30 of noncompliance	$5,000
iii. Each day after day 30	$10,000

51. All penalties shall begin to accrue on the date that performance is due or a violation occurs, and shall continue to accrue through the final day of correction of the non-compliance.

52. Respondent shall pay stipulated penalties in the amounts set forth in this Section upon demand by the Complainant if Respondent fails to comply with the requirements of the

CAFO specified above. All penalties to Complainant under this Section VI (Stipulated Penalties) shall be due within thirty (30) days of receipt of a demand letter from Complainant. Interest at the current rate published by the United States Treasury, as described at 40 C.F.R. § 13.11, shall begin to accrue on the unpaid balance at the end of the thirty-day period.

53. All stipulated penalties shall be made payable by check to "Treasurer, the United States of America," and shall be remitted to:

U.S. EPA
Fines and Penalties
Cincinnati Finance Center
P.O. Box 979077
St. Louis, MO 63197-9000

54. Respondent shall provide a transmittal letter, stating Respondent's name, complete address and the case docket number with the stipulated penalty payment. Respondent must write the case docket number on the face of the check.

55. Respondent must also provide a copy of the check and the transmittal letter to:

Regional Hearing Clerk (E-19J)
U.S. EPA – Region 5
77 West Jackson Boulevard
Chicago, IL 60604 – 3590

Kendall Moore (LC-8J)
U.S. EPA – Region 5
77 West Jackson Boulevard
Chicago, IL 60604 – 3590

Susan Perdomo (C-14J)
U.S. EPA – Region 5
77 West Jackson Boulevard
Chicago, IL 60604 – 3590

56. The payment of stipulated penalties shall not alter in any way Respondent's obligation to complete the performance required hereunder.

57. Payment of stipulated penalties as set forth above shall be in addition to any other rights or remedies that may be available to the United States or its agencies by reason of Respondent's failure to comply with requirements of this CAFO, or all applicable federal, state, or local laws, regulations and permits. The payment of such stipulated penalties shall not be construed to relieve Respondent from specific compliance with this CAFO, nor shall it limit Complainant's authority to require compliance with such laws.

VII. Dispute Resolution

58. The dispute resolution provision will not apply in the event of an imminent threat to human health or the environment as determined by Complainant. For all other disputes, the parties agree to use their best efforts to informally and in good faith resolve all disputes relating to this CAFO.

59. Any dispute that arises with respect to the meaning, application, implementation, amendment or modification of this CAFO, or with respect to Respondent's compliance herewith or any delay hereunder, the resolution of which is not expressly provided for in this CAFO, shall in the first instance be the subject of informal negotiations. If Respondent believes it has a dispute with Complainant, it shall notify Chief, RCRA Corrective Action Section 1 at the address identified in Paragraph 36.c. of the matter(s) in dispute. Respondent's project coordinator and Chief, RCRA Corrective Action Section 1 shall attempt to resolve the dispute informally. Such period of informal negotiations shall not exceed 30 days from the date the Respondent provided notice of dispute, unless the Parties

agree otherwise. At the end of this time period, Chief, RCRA Corrective Action Section 1 shall provide an informal written decision to Respondent's project coordinator.

60. If the informal dispute resolution negotiations are unsuccessful, Respondent may request formal dispute resolution by submitting written objections to Complainant's counsel. The written objection(s) must be sent to Complainant within 20 days of receipt of the communication from Chief, RCRA Corrective Action Section 1. The written objection shall describe the nature of the dispute and the proposal for its resolution.

61. The parties shall attempt to resolve Respondent's formal request for dispute resolution within 30 days from the date Complainant receives Respondent's written request. During this time period, Respondent may request to meet with the Director of the Land and Chemicals Division, EPA Region 5 to discuss Respondent's dispute and/or objections.

62. Within 30 days of the conclusion of the formal discussion under Paragraphs 60 and 61, the Director of the Land and Chemicals Division shall provide to Respondent in writing Complainant's decision of the pending dispute, which will constitute the Agency's final decision under the dispute resolution provisions of this CAFO. The written decision shall be sent to Respondent by facsimile transmission and by certified mail.

63. Stipulated penalties with respect to any disputed matter (and interest thereon) shall accrue in accordance with Paragraphs 50 and 51; however, payment of stipulated penalties shall be stayed pending resolution of the dispute. When the dispute is resolved, either formally or informally, accrued penalties (and interest), if any, determined to be owing shall be paid within 60 days of receipt of Complainant's informal or formal position in writing.

64. Complainant and Respondent may, upon mutual written agreement, extend any of the time periods provided for the dispute resolution process.

VIII. Settlement of Claims/Reservation of Rights

65. Complainant and Respondent, having sought to informally settle this matter, have agreed to the terms of this Consent Agreement in order to resolve this action without trial or other litigation. 40 C.F.R. §§ 22.18 (b) and (c).

66. Respondent neither admits nor denies the factual allegations contained in this CAFO, 40 C.F.R. § 22.18 (b), and nothing herein shall be construed as an admission of liability by Respondent.

67. The terms of this CAFO constitute a settlement by Complainant for all claims for civil penalties to Section 16 of TSCA, 15 U.S.C. § 2615, for the alleged violations of TSCA specified in Section III of this CAFO.

68. This CAFO shall become effective on the date that it is filed with Regional Hearing Clerk.

Except as it relates to those matters resolved by this Consent Agreement and attached Final Order:

69. Compliance with this CAFO shall not be a defense to any other actions commenced pursuant to Federal, state and local environmental laws and it is the responsibility of Respondent to comply with all applicable provisions of TSCA and any other Federal, state or local laws and regulations.

70. Nothing is this CAFO is intended to nor shall be construed to operate in any way to resolve any criminal liability.

71. Complainant hereby reserves all of its statutory and regulatory powers, authorities, rights and remedies, both legal and equitable, including the right to require that Respondent perform tasks in addition to those required by this CAFO at Section IV. This CAFO shall not be construed as a covenant not to sue, release, waiver or limitation of any rights, remedies, powers or authorities, which Complainant has under TSCA or any other statutory, regulatory or common law enforcement authority of the United States.

72. Respondent reserves all rights it may have under Federal, state or local statute, regulation or common law, except those rights they have expressly waived under Paragraph 5 through 7 of this CAFO.

73. The entry of this CAFO and Respondent's consent to comply shall not limit or otherwise preclude Complainant from taking additional enforcement action should Complainant determine that such actions are warranted, except as it relates to those matters resolved by this CAFO.

74. This CAFO is not intended to be nor shall it be construed as a permit. This CAFO does not relieve Respondent of any obligation to obtain and comply with any Federal, state or local permits.

75. Nothing in this CAFO shall constitute or be construed as a release from any other claim, cause of action or demand on law or equity by or against any person, firm, partnership, entity or corporation for any liability it may have arising out of the relating in any way to the generation, storage, treatment, handling, transportation, release or disposal of any hazardous constituents, hazardous substances, hazardous waste, pollutants, or contaminants found at, taken to, or taken from the ATF.

76. Each party agrees to bear its own costs and attorneys' fees in the action resolved by this CAFO.

77. The headings in this CAFO are for convenience of reference only and shall not affect interpretation of this CAFO.

78. This CAFO constitutes the entire agreement between Complainant and Respondent.

IX. Termination

79. This CAFO shall terminate when the paint containing PCBs > 50 mg/kg is removed from the ATF, or ten years from its effective date of this CAFO, whichever comes earlier. No earlier than two years prior to termination, Respondent may petition EPA to amend this CAFO to extend the termination date. Respondent shall provide a detailed explanation to EPA describing why the extension is necessary, including the projected future military and commercial customer needs for the testing capability that the ATF provides. It shall be within EPA's sole discretion to grant such extension. EPA's decision whether or not to grant an extension is not subject to Dispute Resolution under Section VII of this CAFO.

IN THE MATTER OF:

General Electric Company
Evendale, Ohio

GENERAL ELECTRIC COMPANY, RESPONDENT

27-MAR-2014
Date

Tony Aiello
Vice President & General Manager
Assembly, Test & MRO

IN THE MATTER OF:

General Electric Company
Evendale, Ohio

UNITED STATES ENVIRONMENTAL PROCTECTION AGENCY, COMPLAINANT

4/24/2014
Date

Margaret M. Guerriero
Director
Land and Chemicals Division

IN THE MATTER OF:

General Electric Company
Evendale, Ohio
Docket No. **TSCA-05-2014-0008**

FINAL ORDER

This Consent Agreement and Final Order, as agreed to by the parties, shall become effective immediately upon filing with the Regional Hearing Clerk. This Final Order concludes this proceeding pursuant to 40 C.F.R. §§ 22.18 and 22.3. IT IS SO ORDERED.

4-25-2014
Date

Susan Hedman
Regional Administrator
United States Environmental Protection Agency
Region 5

CASE NAME: General Electric
DOCKET NO: TSCA-05-2014-0008

CERTIFICATE OF SERVICE

I hereby certify that the original signed copy of the **Consent Agreement and Final Order** and this **Certificate of Service** was filed with the office of the Regional Hearing Clerk (E-19J), U.S. Environmental Protection Agency Region 5, 77 West Jackson Boulevard, Chicago, Illinois 60604-3590 on April 28, 2014.

I further certify that I then caused true and correct copies of the filed document to be mailed via Certified Mail, Return Receipt Requested to the following:

Mr. Chris Bell
Greenberg Traurig, LLP
1000 Louisiana Street, Suite 1700
Houston, Texas 77002

Return Receipt # **70091680000076638074**

And forwarded copies (intra-Agency) to:

Ann Coyle, Regional Judicial Officer, ORC/C-14J
Susan Perdomo, ORC/C-14J
Kendall Moore LCD/CMB/LC-8J
Peter Ramanauskas LCD/RRB/LU-9J

Dated: April 28, 2014

Angela Jackson
Administrative Program Assistant
United States Environmental Protection Agency
Land and Chemicals Division-RRB
77 West Jackson Boulevard
Chicago, Illinois 60604-3590
(312) 353-8973

Attachment C

GE Aviation Short-Term Section 761.62(c) Submission (November 16, 2012)

GE Aviation

Tony Aiello
Vice President & General Manager
Assembly, Test & Overhaul CoE

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USA

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F +1 513 672 0912
tony.aiello1@ge.com

November 16, 2012

VIA FEDERAL EXPRESS AND E-MAIL

Susan Hedman
Regional Administrator
U.S. EPA Region 5
77 W. Jackson Blvd
Chicago, IL 60604

RE: GE Aviation Short-Term Section 761.62(c) Submission

Dear Administrator Hedman:

This is a petition, made pursuant to 40 C.F.R. § 761.62(c), by GE Aviation, an operating division of the General Electric Company ("GE"), for an interim risk-based alternative cleanup solution to address the presence of PCB-containing paint that was recently discovered on the inlet air induction system at the Altitude Test Facility ("ATF") at GE's jet engine manufacturing facility in Cincinnati, Ohio.

These interim measures will allow GE to conduct four currently scheduled jet engine tests in a manner that does not pose an unreasonable risk to human health and the environment. Upon completion of these four tests, and in any event no later than July 31, 2013, any further operations at the ATF will be in accordance with an agreement with U.S. EPA with respect to a permanent plan to address the PCB-containing paint in the ATF.

This interim solution will also allow GE to meet short-term commitments to conduct jet engine tests for the U.S. Navy that are part of a program to resolve reliability issues that are impairing the operational capability of certain military aircraft currently in service. These commitments include a test scheduled for early December 2012. A letter from the Navy indicating the importance of these tests will be forwarded under separate cover. For this reason, GE seeks approval from U.S. EPA in time to be able to initiate the first of these tests by December 3, 2012.

The central elements of this proposed interim solution are:

- The interior of the inlet air induction piping network will be double washed, double rinsed and double painted, consistent 40 C.F.R. § 761.30(p).

General Electric Company

- PCB M_L signs will be installed at appropriate locations, including entrance points to the ATF.
- The exterior of the inlet air induction pipes are, with the exception of certain fittings and appurtenances, covered with a multi-layered protective barrier, completed with an aluminum sheathing. This covering will be maintained and the piping marked appropriately.
- GE employees and contractors have been made aware of the presence of PCB-containing paint on the inlet air induction pipes, and work practices are in place to limit their exposure to such paint.
- GE has implemented an operations plan for the management of wastes (e.g. PPE, etc.) as potentially PCB-containing for storage and disposal.

The period during which this interim solution would be authorized would end on July 31, 2013.

1. Description of the ATF

The GE Aviation facility in Cincinnati, Ohio designs, develops, manufactures and tests jet engines for military and commercial customers. The facility operates an engine test facility known as the Altitude Test Facility (ATF). The purpose of the ATF is to test jet engines in conditions that simulate the use of the engines at a wide range of altitudes (up to 30,000 feet) and speeds (over 2,000 mph). The ATF is one of only two facilities that exist in the US that has these capabilities (the other is owned and operated by the US Air Force).

The ATF is a free-standing building that contains two engine test cell compartments. Engines are mounted in these compartments, which are closed during the testing phase. Through the use of a complex air induction piping network, compressed air is introduced into the jet engine during testing to simulate speed. By manipulating the flow of compressed air within the test chamber, altitude conditions also are simulated. The exhaust from the test compartments is routed through two stacks (one for each test cell compartment). The length of any particular test is dependent on the requirements set by the customer, and can range from a few days to several months. It is important to note that the engine is not operated continuously during the test period. It is operated for different lengths of time under different conditions and subject to periods of downtime while analysis is conducted by the project team.

The air induction piping network consists of a series of primarily six-foot diameter piping constructed of ½-inch thick specialty steel that was pre-finished with paint on both the exterior and interior surfaces by the manufacturer/supplier of the piping network. The piping network, which spans a total length of approximately 1,000 linear feet, is encapsulated with a multi-layered insulation consisting of metal mesh, mineral wool, and an asbestos-containing material, all covered by an aluminum jacket held in place with steel bands. Valves, certain pipe joints, and other appurtenances on the piping network are not covered with the insulation.

To avoid the ingestion of foreign objects or debris ("FOD") by the jet engines during testing, portions of the air induction piping network are periodically inspected to verify that there is no peeling paint or other material in the pipes that might be drawn into the engines when the compressed air is pushed through the system. These FOD inspections are typically conducted once or twice a week during a testing cycle, and take approximately 1 – 2 hours to complete.

2. PCB Sampling Data

On October 26, 2012, GE received sampling data indicating that the paint originally used on the ATF air induction piping network by the manufacturer of the network contained $\geq$ 50 milligrams per kilogram (mg/kg) PCBs. GE informed U.S. EPA of this issue on November 1, 2012, and provided U.S. EPA with a summary of the PCB sampling data on November 6, 2012.

GE sampled paint on both the interior and exterior of the piping, taking both wipe and bulk (i.e., paint chip) samples. In addition, air sampling was conducted within the piping (during static conditions) and the ATF building. The sampling and analytical work was conducted in accordance with U.S. EPA-approved protocols. The results of the sampling, including the QA/QC documentation, are included in Attachment A to this submission.

The results of the PCB data are summarized as follows:

Interior Pipe Surfaces

- 53 wipe samples - results ranging from non-detectable (ND) to 10.0 micrograms per 100 square centimeters (µg/100 cm^2).
- 30 paint chip samples - results ranging from ND to 42,000 mg/kg.

Exterior Pipe Surfaces

- 42 wipe samples - results ranging from ND to 2,900 µg/100 cm^2.
- 29 paint chip samples - results ranging from ND to 100,000 mg/kg.

Air Monitoring

- 2 locations inside the pipe – ND and 125 nanograms per cubic meter (ng/cm^3).
- 2 locations in the ATF - ND and 83.3 ng/cm^3.

The concentration of PCBs in the paint and the nature of the operations in the ATF indicate that these are so-called "non-liquid" PCBs that were present in the paint at the time of manufacture, not PCBs spilled or released onto the paint.

3. Interim Plan For Operations And Managing The PCB-Containing Paint

GE is taking the following actions to prevent or reduce exposures to the PCB-containing paint on the ATF air induction piping:

- The interior of the air induction piping network is being double washed, double rinsed, and double painted (with contrasting colors of paint).
- The aluminum-clad exterior insulation on the piping system will be maintained.
- The PCB M_L mark will be placed at appropriate locations on the piping system and at entrance points to the ATF.
- GE employees have already been made aware of the presence of PCBs in the paint.
- Work practices have been adopted to minimize the potential for exposure to PCBs, including training and the use of PPE (e.g., Tyvek suits and respiratory protection) for employees who conduct the periodic FOD inspections the maintenance activities related to the piping system.
- Any waste generated by the double wash/double rinse/double paint process, as well as any waste generated by FOD inspections or maintenance activities involving the piping, will be managed and disposed of as either PCB Remediation Waste or PCB Bulk Product Waste, as appropriate.
- The engine testing operations GE anticipates conducting in accordance with this interim solution will involve four jet engine altitude tests (i.e., tests where the various flight altitudes will be simulated during the test):

Engine	Purpose	Estimated Duration	Required Completion Date
F414	Collect data to support design improvements to prevent engine stalls that have been the second leading cause of unscheduled engine removals in the F-18 fleet.	2.5 months (approx. 75 hours of test run time)	1/15/2013
F414	Assurance testing to validate solutions to the fourth leading cause of unscheduled engine removals in the F-18 fleet.	1 month (approx. 25 hours of test run time)	3/9/2013
LEAP Core	Testing required to optimize the performance, operability and aero-dynamics of engine operation to ensure durability and reliability for entry into service application.	2.5 months (approx. 100 hours of test run time)	6/15/2013
F414	Test technology that will eliminate a failure mode for the engine, and also support planned engine design enhancement to improve F-18 mission capability.	3 months (approx. 487 hours of test run time)	7/15/2013

The first test is particularly sensitive and time-critical, since it is part of an important effort to determine the cause of, and prevent, engine stalls on the F-18 fleet.

GE is proposing an end date of July 31, 2013 to allow for the possibility of some schedule slippage on these tests, which in our experience frequently occurs due to the highly complex nature of these engines during research, development and analysis, as well as changing customer requirements.

4. The Interim Plan Will Not Pose An Unreasonable Risk

GE believes that the measures described above will prevent any unreasonable risk associated with the PCB-containing paint on the air induction piping network during the four jet engine altitude tests that will be conducted between December 3, 2012 and July 31, 2013.

- There is very low likelihood of exposure to the PCB-containing paint on the exterior of the piping because it is covered with the aluminum-clad insulation.
- Any maintenance associated on the pipes will be conducted pursuant to defined work procedures that will protect against exposure to PCBs and require the proper management and disposal of waste.
- Any PCB-containing paint on the interior of the piping will not pose an unreasonable risk because:
  - The surface will have been cleaned and then coated with two layers of paint. Therefore, there should not be any exposure of concern to PCBs on the surface of the pipe. Further, even before the washing and painting, the highest level PCB level detected on the interior surface of the pipe was 10 μg/100 cm^2, which is consistent with the decontamination standard for unpainted non-porous surfaces that U.S. EPA has already found does not pose an unreasonable risk. The cleaning and painting of the piping surface should provide more protection than what is already allowed under the PCB regulations pursuant to 40 C.F.R. § 761.30(p), since the situation at the ATF involves non-liquid PCBs.
  - Exposure to the interior of the piping will be very limited, with trained GE employees, using PPE, entering the piping system for approximately 2 – 4 hours/week during any particular testing regime, ending in July 2013.
- GE employees have already been made aware of the presence of PCB-containing paint on the air induction system piping, PCB M_L marks will be a regular reminder of that fact, and they will also be trained to take proper precautions when working around or on the piping system.
- The air sampling demonstrated that the PCB concentrations in the air, both inside the piping and in the ATF generally, are well below any standard considered by U.S. EPA in the context of regular occupational exposures (e.g., 40 hour/week exposure over several years). For example, U.S. EPA has suggested a standard of 450 ng/cm^3 for school teachers exposed 40 hours/week, 9 months/year. The highest level measured in the ATF itself is 83.3 ng/cm^3, with 125 ng/cm^3 measured inside the piping network (where the exposure might be only 2 – 4 hours/week, to trained workers wearing PPE, and only then during periods when tests are being run).
- The engine tests themselves will not disturb the PCB-containing paint in or on the air induction piping system. The engines are mounted in the test cell compartments, a process that does not involve working on the piping system. Further, the periodic

FOD inspections of the piping are intended to identify, among other things, any peeling paint to avoid it being ingested by the engines during the tests. Given that the piping will have just been painted with two coats of paint that does not contain PCBs, GE does not anticipate that there will be any peeling paint between now and July 31, 2013 and, if there is any, it will not be PCB-containing paint.

- Limiting the operations to four altitude tests, with an end date of July 31, 2013, will also serve to avoid any significant exposure to PCBs.
- Any PCB Bulk Product Waste generated at the ATF will be properly managed and disposed of in accordance with TSCA requirements.

5. Conclusion

GE believes that conducting four altitude engine tests at the ATF between now and July 31, 2013, in accordance with the conditions proposed in this submission, will not pose an unreasonable risk to human health or the environment. Accordingly, GE requests that U.S. EPA grant this petition for an interim solution, if at all possible by December 3, 2012. GE also looks forward to promptly initiating discussions with U.S. EPA regarding the longer-term solutions for the PCB-containing paint at the ATF.

Please do not hesitate to contact John Rumpf, Executive Counsel for Environmental Affairs at GE Aviation, at (513) 243-4256 or Christopher Bell at Sidley Austin LLP at (713) 315-9008 if you have any questions.

Sincerely,

Tony Aiello
Vice President, Assembly, Test & Overhaul

Enclosure

cc: Peter Ramanauskas, Regional PCB Coordinator, U.S. EPA Region 5
Susan Perdomo, Counsel, U.S. EPA Region 5
John Rumpf, Executive Counsel for Environmental Affairs, GE Aviation
Christopher Bell, Sidley Austin LLP

Tables

Table 1

Interior Duct Data Results

Table 1
Data Summary - Interior to Duct Piping

GE Aviation - Cincinnati Ohio
Altitude Test Facility
ATF Ductwork Evaluation

Date Collected	Sample ID	Sample Type	Total PCB Results	Impacted Aroclor
Interior Duct Sampling [1]				
9/12/2012	ATF-DUCT-3C	Wipe	ND	--
9/12/2012	ATF-DUCT-3W	Wipe	ND	--
9/12/2012	ATF-DUCT-3F	Wipe	ND	--
9/12/2012	ATF-DUCT-4C	Wipe	ND	--
9/12/2012	ATF-DUCT-4W	Wipe	ND	--
9/12/2012	ATF-DUCT-4F	Wipe	3.6 µg/100cm^2	1268
9/12/2012	ATF-DUCT-5C	Wipe	ND	--
9/12/2012	ATF-DUCT-5W	Wipe	ND	--
9/12/2012	ATF-DUCT-5F	Wipe	1.7 µg/100cm^2	1268
9/12/2012	ATF-DUCT-6C	Wipe	ND	--
9/12/2012	ATF-DUCT-6W	Wipe	ND	--
9/12/2012	ATF-DUCT-6F	Wipe	ND	--
9/12/2012	ATF-DUCT-7C	Wipe	ND	--
9/12/2012	ATF-DUCT-7W	Wipe	ND	--
9/12/2012	ATF-DUCT-7F	Wipe	9.8 µg/100cm^2	1268
9/12/2012	ATF-DUCT-8C	Wipe	ND	--
9/12/2012	ATF-DUCT-8W	Wipe	ND	--
9/12/2012	ATF-DUCT-8F	Wipe	1.5 µg/100cm^2	1268
9/12/2012	ATF-DUCT-9C	Wipe	ND	--
9/12/2012	ATF-DUCT-9W	Wipe	ND	--
9/12/2012	ATF-DUCT-9F	Wipe	10 µg/100cm^2	1268
PCB Air Sampling Locations				
10/20/2012	ATF-AR-N3-04	Air Sample	83.3 ng/m^3	1262
10/20/2012	ATF-AR-N11-02	Air Sample	ND	--
6-Foot Duct Sample Section 1				
10/19/2012	ATF-WP-N1-01	Wipe	ND	--
10/19/2012	ATF-WP-N1-02	Wipe	ND	--
10/19/2012	ATF-PC-N1-03	Bulk	6.5 mg/kg	1260 (4.0 J) 1268 (2.5 J)
--	ATF-PC-N1-04	[Not able to collect a bulk paint sample]		
6-Foot Duct Sample Section 2				
10/19/2012	ATF-WP-N2-01	Wipe	ND	--
10/19/2012	ATF-WP-N2-02	Wipe	ND	--
10/19/2012	ATF-PC-N2-03	Bulk	ND	--
--	ATF-PC-N2-04	[Not able to collect a bulk paint sample]		
6-Foot Duct Sample Section 3				
10/20/2012	ATF-WP-N3-01	Wipe	ND	--
10/20/2012	ATF-WP-N3-02	Wipe	ND	--
10/20/2012	ATF-PC-N3-03	Bulk	ND	--
10/20/2012	ATF-PC-N3-04	Bulk	ND	--
Coen Unit				
11/8/2012	ATF-WP-CHN-01	Wipe	ND	--
11/8/2012	ATF-PC-CHN-02	Bulk	2000 mg/kg	1260 (76) 1268 (1900)
11/8/2012	ATF-WP-CHN-03	Wipe	ND	--
11/8/2012	ATF-PC-CHN-04	Bulk	680 mg/kg	1260 (29) 1268 (650)
6-Foot Duct Sample Section 4				
10/20/2012	ATF-WP-N4-01	Wipe	0.69 µg/100cm^2	1268
10/20/2012	ATF-WP-N4-02	Wipe	9.0 µg/100cm^2	1262 (2.0) 1268 (7.0)
10/20/2012	ATF-PC-N4-03	Bulk	2000 mg/kg	1260 (700) 1268 (1300)
10/21/2012	ATF-PC-N4-04	Bulk	41000 mg/kg	1260 (17000) 1268 (24000)

Table 1
Data Summary - Interior to Duct Piping

GE Aviation - Cincinnati Ohio
Altitude Test Facility
ATF Ductwork Evaluation

Date Collected	Sample ID	Sample Type	Total PCB Results	Impacted Aroclor
6-Foot Duct Sample Section 5				
10/20/2012	ATF-WP-N5-01	Wipe	0.45 µg/100cm^2	1268
10/20/2012	ATF-WP-N5-02	Wipe	0.92 µg/100cm^2	1268
10/20/2012	ATF-PC-N5-03	Bulk	8200 mg/kg	1260 (2500) 1268 (5700)
10/21/2012	ATF-PC-N5-04	Bulk	1800 J mg/kg	1268
6-Foot Duct Sample Section 6				
10/20/2012	ATF-WP-N6-01	Wipe	1.2 µg/100cm^2	1262 (0.34 J) 1268 (0.89)
10/20/2012	ATF-WP-N6-02	Wipe	3.4 µg/100cm^2	1262 (0.99) 1268 (2.4)
10/20/2012	ATF-PC-N6-03	Bulk	3800 mg/kg	1260 (1200) 1268 (2600)
10/21/2012	ATF-PC-N6-04	Bulk	6100 mg/kg	1260 (2400) 1268 (3700)
6-Foot Duct Sample Section 7				
10/20/2012	ATF-WP-N7-01	Wipe	5.7 µg/100cm^2	1262 (1.3) 1268 (4.4)
10/20/2012	ATF-WP-N7-02	Wipe	3.6 µg/100cm^2	1268
10/20/2012	ATF-PC-N7-03	Bulk	3700 mg/kg	1260 (1400) 1268 (2300)
10/21/2012	ATF-PC-N7-04	Bulk	14000 mg/kg	1254 (370) 1260 (5500) 1268 (7900)
6-Foot Duct Sample Section 8				
10/20/2012	ATF-WP-N8-01	Wipe	0.49 µg/100cm^2	1268
10/20/2012	ATF-WP-N8-02	Wipe	0.47 µg/100cm^2	1268
10/20/2012	ATF-PC-N8-03	Bulk	42000 mg/kg	1268
10/21/2012	ATF-PC-N8-04	Bulk	14000 mg/kg	1268 (9000)
6-Foot Duct Sample Section 9				
10/20/2012	ATF-WP-N9-01	Wipe	0.14 J µg/100cm^2	1268
10/20/2012	ATF-WP-N9-02	Wipe	2.7 µg/100cm^2	1262 (0.98) 1268 (1.7)
10/20/2012	ATF-PC-N9-03	Bulk	12000 mg/kg	1268 (7300)
10/21/2012	ATF-PC-N9-04	Bulk	14000 mg/kg	1260 (6300) 1268 (8100)
6-Foot Duct Sample Section 10				
10/20/2012	ATF-WP-N10-01	Wipe	2.2 µg/100cm^2	1262 (0.99) 1268 (1.2)
10/20/2012	ATF-WP-N10-02	Wipe	0.14 J µg/100cm^2	1268
10/20/2012	ATF-PC-N10-03	Bulk	8.2 mg/kg	1262 (5.3) 1268 (2.9)
10/20/2012	ATF-PC-N10-04	Bulk	35 mg/kg	1262 (9.3) 1268 (26)
6-Foot Duct Sample Section 11				
10/20/2012	ATF-WP-N11-01	Wipe	3.1 µg/100cm^2	1262 (1.2) 1268 (1.9)
10/20/2012	ATF-WP-N11-02	Wipe	0.39 J µg/100cm^2	1262 (0.22 J) 1268 (0.17 J)
10/20/2012	ATF-PC-N11-03	Bulk	2.1 mg/kg	1262 (0.88) 1268 (1.2)
10/20/2012	ATF-PC-N11-04	Bulk	40 mg/kg	1262 (8.4) 1268 (32)

Table 1
Data Summary - Interior to Duct Piping

GE Aviation - Cincinnati Ohio
Altitude Test Facility
ATF Ductwork Evaluation

Date Collected	Sample ID	Sample Type	Total PCB Results	Impacted Aroclor
10-Foot Duct Sample Section 12				
10/19/2012	ATF-WP-N12-01	Wipe	ND	--
10/19/2012	ATF-WP-N12-02	Wipe	ND	--
10/19/2012	ATF-PC-N12-03	Bulk	0.91 mg/kg	1260 (0.42) 1268 (0.49)
10/19/2012	ATF-PC-N12-04	Bulk	0.45 mg/kg	1260 (0.27) 1268 (0.18 J)
10-Foot Duct Sample Section 13				
10/19/2012	ATF-WP-N13-01	Wipe	ND	--
10/19/2012	ATF-WP-N13-02	Wipe	ND	--
10/19/2012	ATF-PC-N13-03	Bulk	ND	--
10/19/2012	ATF-PC-N13-04	Bulk	ND	--
6-Foot Duct Sample Section 14				
10/19/2012	ATF-WP-N14-01	Wipe	ND	--
10/19/2012	ATF-WP-N14-02	Wipe	ND	--
10/19/2012	ATF-PC-N14-03	Bulk	0.96 mg/kg	1260 (0.45) 1268 (0.50)
10/19/2012	ATF-PC-N14-04	Bulk	0.93 mg/kg	1260 (0.33) 1268 (0.60)
6-Foot Duct Sample Section 15				
10/19/2012	ATF-WP-N15-01	Wipe	ND	--
10/19/2012	ATF-WP-N15-02	Wipe	ND	--
10/19/2012	ATF-PC-N15-03	Bulk	8.2 mg/kg	1260 (4.0) 1268 (4.2)
10/19/2012	ATF-PC-N15-04	Bulk	4.4 mg/kg	1260 (2.1) 1268 (2.3)

Notes:
1. ND - No Detection
2. ng/m^3 - nanograms/cubic meter
3. mg/kg - micrograms/kilogram (ppm)
4. µg/100cm^2 - micrograms/100 square-centimeters
5. ATF-PC-T6-02 was labeled incorrectly and is a wipe sample and not a paint chip sample.
6. Duct Section numbers based on Arcadis sampling plan.
7. [Not able to collect a bulk paint sample] - Second bulk sample will not be attemped due to insufficent paint.

Sample ID Nomenclature:
C - Ceiling sample.
W - Wall sample.
F - Floor Sample
WP - Wipe Sample.
PC - Bulk Paint Chip Sample.
N - Interior sample
T - Exterior sample.
T4FT - Exterior Sample, Located on 42inch Duct in Building 518.
AR - PCB Air Sample

Table 2

Exterior Duct Data Results

Table 2
Data Summary - Exterior to Duct Piping

GE Aviation - Cincinnati Ohio
Altitude Test Facility
ATF Ductwork Evaluation

Date Collected	Sample ID	Sample Type	Total PCB Results	Impacted Aroclor
PCB Air Sampling Locations				
10/20/2012	ATF-AR-T6-05	Air Sample	ND	--
10/20/2012	ATF-AR-T15-03	Air Sample	125 ng/m^3	1262
6-Foot Duct Sample Section 1				
10/20/2012	ATF-WP-T1-01	Wipe	ND	--
10/20/2012	ATF-WP-T1-02	Wipe	ND	--
10/20/2012	ATF-PC-T1-03	Bulk	1300 mg/kg	1262 (130) 1268 (1200)
--	ATF-PC-T1-04	[Not able to collect a bulk paint sample]		
6-Foot Duct Sample Section 2				
10/20/2012	ATF-WP-T2-01	Wipe	ND	--
10/20/2012	ATF-WP-T2-02	Wipe	29 µg/100cm^2	1260 (15) 1268 (14)
10/20/2012	ATF-PC-T2-03	Bulk	530 mg/kg	1260 (240) 1268 (290)
10/20/2012	ATF-PC-T2-04	Bulk	77000 mg/kg	1254 (5500 J) 1260 (36000) 1268 (35000)
6-Foot Duct Sample Section 3				
10/20/2012	ATF-WP-T3-01	Wipe	0.87 µg/100cm^2	1268
10/20/2012	ATF-WP-T3-02	Wipe	ND	--
10/20/2012	ATF-PC-T3-03	Bulk	14 mg/kg	1262 (4.8) 1268 (9.5)
--	ATF-PC-T3-04	[Not able to collect a bulk paint sample]		
Coen Unit				
11/8/2012	ATF-WP-CHN-01	Wipe	ND	--
11/8/2012	ATF-PC-CHN-02	Bulk	40000 mg/kg	1260 (6200) 1268 (34000)
11/8/2012	ATF-WP-CHN-03	Wipe	ND	--
11/8/2012	ATF-PC-CHN-04	Bulk	32000 mg/kg	1260 (5600) 1268 (26000)
6-Foot Duct Sample Section 4				
10/19/2012	ATF-WP-T4-01	Wipe	180 µg/100cm^2	1254 (8.1) 1260 (80) 1268 (89)
10/20/2012	ATF-WP-T4-02	Wipe	36 µg/100cm^2	1268
10/19/2012	ATF-PC-T4-03	Bulk	23000 mg/kg	1260 (11000) 1268 (12000)
--	ATF-PC-T4-04	[Not able to collect a bulk paint sample]		
6-Foot Duct Sample Section 5				
--	ATF-WP-T5-01	[Not able to collect a bulk paint sample, covered by ACM wrap]		
--	ATF-WP-T5-02	[Not able to collect a bulk paint sample, covered by ACM wrap]		
--	ATF-PC-T5-03	[Not able to collect a bulk paint sample, covered by ACM wrap]		
--	ATF-PC-T5-04	[Not able to collect a bulk paint sample, covered by ACM wrap]		
6-Foot Duct Sample Section 6				
10/20/2012	ATF-WP-T6-01	Wipe	2.4 µg/100cm^2	1268
10/20/2012	ATF-PC-T6-02*	Wipe	4.7 µg/100cm^2	1268
10/20/2012	ATF-PC-T6-03	Bulk	40000 mg/kg	1262 (14000) 1268 (26000)
10/20/2012	ATF-PC-T6-04	Bulk	47 mg/kg	1262 (25) 1268 (22)

Table 2
Data Summary - Exterior to Duct Piping

GE Aviation - Cincinnati Ohio
Altitude Test Facility
ATF Ductwork Evaluation

Date Collected	Sample ID	Sample Type	Total PCB Results	Impacted Aroclor
6-Foot Duct Sample Section 7				
10/21/2012	ATF-WP-T7-01	Wipe	810 µg/100cm^2	1260 (390) 1268 (420)
10/21/2012	ATF-WP-T7-02	Wipe	590 µg/100cm^2	1260 (230) 1268 (360)
10/21/2012	ATF-PC-T7-03	Bulk	ND	--
10/21/2012	ATF-PC-T7-04	Bulk	69000 mg/kg	1260 (36000) 1268 (33000)
6-Foot Duct Sample Section 8				
10/21/2012	ATF-WP-T8-01	Wipe	2600 µg/100cm^2	1260 (1200) 1268 (1400)
10/21/2012	ATF-WP-T8-02	Wipe	1500 µg/100cm^2	1260 (680) 1268 (770)
10/21/2012	ATF-PC-T8-03	Bulk	30000 mg/kg	1268 (12000)
--	ATF-PC-T8-04	[Not able to collect a bulk paint sample]		
6-Foot Duct Sample Section 9				
10/21/2012	ATF-WP-T9-01	Wipe	140 µg/100cm^2	1268
10/21/2012	ATF-WP-T9-02	Wipe	2900 µg/100cm^2	1260 (1600) 1268 (1300)
10/21/2012	ATF-PC-T9-03	Bulk	28000 mg/kg	1260 (13000) 1268 (13000)
10/21/2012	ATF-PC-T9-04	Bulk	45000 mg/kg	1260 (22000) 1268 (17000)
6-Foot Duct Sample Section 10				
10/19/2012	ATF-WP-T10-01	Wipe	37 µg/100cm^2	1260 (22) 1268 (15)
10/20/2012	ATF-WP-T10-02	Wipe	ND	--
10/19/2012	ATF-PC-T10-03	Bulk	95000 J mg/kg	1254 (8700 J) 1260 (44000) 1268 (42000)
10/20/2012	ATF-PC-T10-04	Bulk	46000 mg/kg	1262 (29000) 1268 (17000)
6-Foot Duct Sample Section 11				
10/19/2012	ATF-WP-T11-01	Wipe	440 µg/100cm^2	1260 (190) 1268 (250)
10/19/2012	ATF-WP-T11-02	Wipe	760 µg/100cm^2	1260 (340) 1238 (420)
10/19/2012	ATF-PC-T11-03	Bulk	100000 mg/kg	1260 (50000) 1268 (51000)
10/19/2012	ATF-PC-T11-04	Bulk	80000 mg/kg	1260 (41000) 1268 (39000)
10-Foot Duct Sample Section 12				
10/19/2012	ATF-WP-T12-01	Wipe	1.0 µg/100cm^2	1268
10/19/2012	ATF-WP-T12-02	Wipe	43 µg/100cm^2	1254 (1.4) 1260 (19) 1268 (23)
10/19/2012	ATF-PC-T12-03	Bulk	640 mg/kg	1254 (120) 1260 (260) 1268 (260)
--	ATF-PC-T12-04	[Not able to collect a bulk paint sample]		
10-Foot Duct Sample Section 13				
10/18/2012	ATF-WP-T13-01	Wipe	ND	--
10/18/2012	ATF-WP-T13-02	Wipe	ND	--
10/18/2012	ATF-PC-T13-03	Bulk	ND	--
--	ATF-PC-T13-04	[Not able to collect a bulk paint sample]		

Table 2
Data Summary - Exterior to Duct Piping

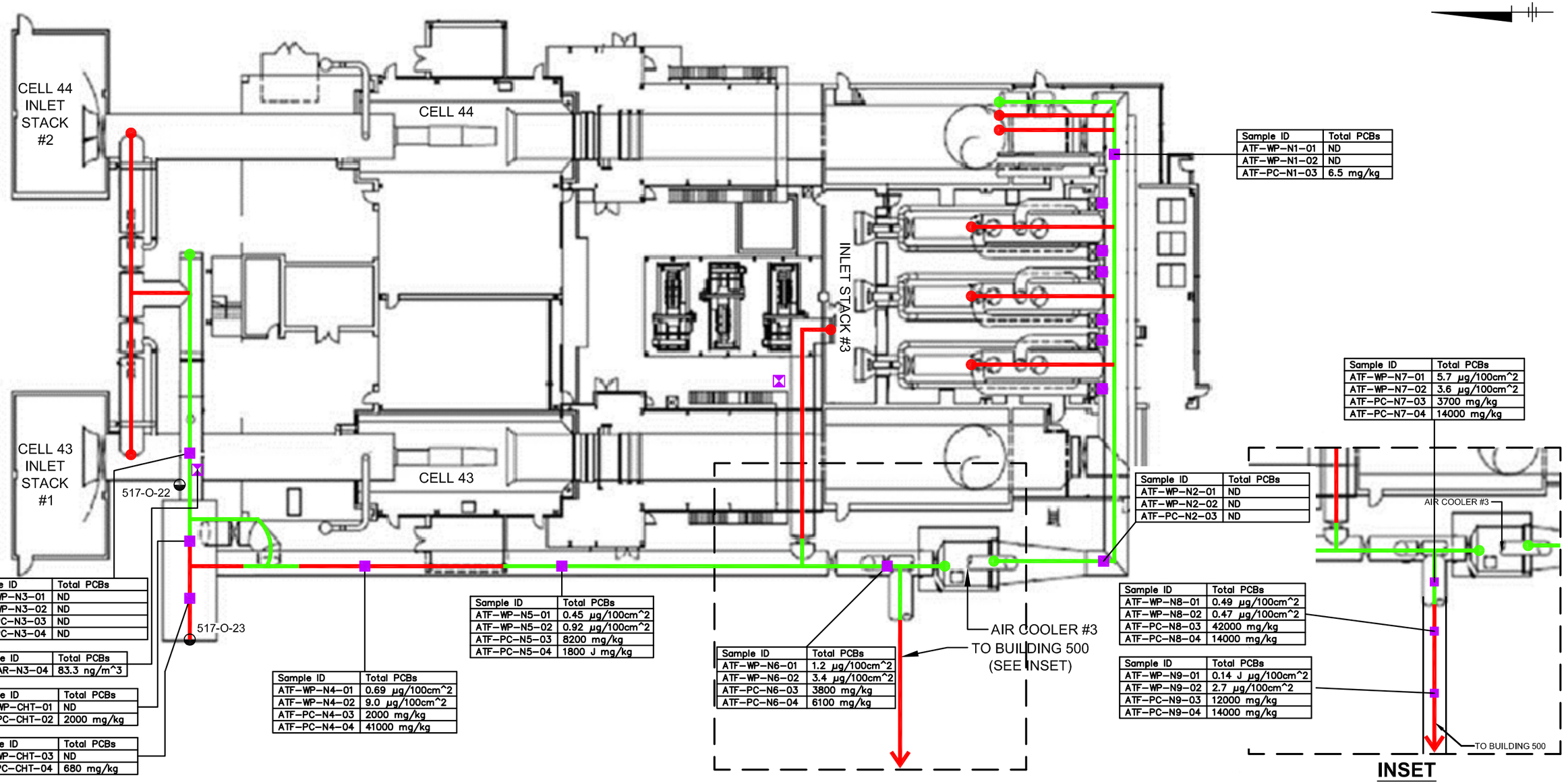
GE Aviation - Cincinnati Ohio
Altitude Test Facility
ATF Ductwork Evaluation

Date Collected	Sample ID	Sample Type	Total PCB Results	Impacted Aroclor
6-Foot Duct Sample Section 14				
10/18/2012	ATF-WP-T14-01	Wipe	ND	--
10/18/2012	ATF-WP-T14-02	Wipe	ND	--
10/18/2012	ATF-PC-T14-03	Bulk	4.1 mg/kg	1254 (.75) 1260 (3.3)
--	ATF-PC-T14-04	[Not able to collect a bulk paint sample]		
6-Foot Duct Sample Section 15				
10/19/2012	ATF-WP-T15-01	Wipe	ND	--
10/19/2012	ATF-WP-T15-02	Wipe	23 µg/100cm^2	1260 (10) 1268 (13)
10/19/2012	ATF-PC-T15-03	Bulk	ND	--
10/19/2012	ATF-PC-T15-04	Bulk	9200 mg/kg	1260 (3400) 1268 (5800)
42-Inch Diameter Duct Samples				
10/20/2012	ATF-WP-T4FT-01	Wipe	ND	--
10/20/2012	ATF-WP-T4FT-02	Wipe	0.28 J µg/100cm^2	1260
10/20/2012	ATF-WP-T4FT-03	Wipe	0.24 J µg/100cm^2	1260
10/20/2012	ATF-WP-T4FT-04	Wipe	0..67 µg/100cm^2	1260
10/20/2012	ATF-WP-T4FT-05	Wipe	4.0 µg/100cm^2	1260 (0.67) 1268 (3.3)
10/20/2012	ATF-WP-T4FT-06	Wipe	1.1 µg/100cm^2	1260
10/20/2012	ATF-WP-T4FT-07	Wipe	ND	--
10/20/2012	ATF-WP-T4FT-08	Wipe	0.32 J µg/100cm^2	1260
10/20/2012	ATF-WP-T4FT-09	Wipe	0.17 J µg/100cm^2	1260
10/20/2012	ATF-WP-T4FT-10	Wipe	1.4 µg/100cm^2	1260
10/20/2012	ATF-WP-T4FT-11	Wipe	0.25 J µg/100cm^2	1260
10/20/2012	ATF-WP-T4FT-12	Wipe	0.30 J µg/100cm^2	1260
10/21/2012	ATF-PC-T4FT-13	Bulk	27 mg/kg	1260 (11 J) 1268 (16 J)
10/21/2012	ATF-PC-T4FT-14	Bulk	6.2 J mg/kg	1268 (6.2 J)
10/21/2012	ATF-PC-T4FT-15	Bulk	14 mg/kg	1260 (6.1 J) 1268 (7.6 J)
10/21/2012	ATF-PC-T4FT-16	Bulk	8.9 mg/kg	1254 (1.3) 1260 (4.0) 1268 (3.6)
10/21/2012	ATF-PC-T4FT-17	Bulk	ND	--
10/21/2012	ATF-PC-T4FT-18	Bulk	5.4 mg/kg	1260 (2.4) 1268 (3.0)

Notes:
1. ND - No Detection
2. ng/m^3 - nanograms/cubic meter
3. mg/kg - milogram/kilogram
4. * - ATF-PC-T6-02 was labeled incorrectly and is a wipe sample and not a paint chip sample.
5. µg/100cm^2 - micrograms/100 square-centimeters
6. Duct Section numbers based on Arcadis sampling plan.
7. [Not able to collect a bulk paint sample] - Second bulk sample will not be attemped due to insufficent paint.

Sample ID Nomenclature:
C - Ceiling sample
W - Wall sample
F - Floor Sample
WP - Wipe Sample
PC - Bulk Paint Chip Sample
N - Interior sample
T - Exterior sample
T4FT - Exterior Sample, Located on 42-inch Duct in Building 518
AR - PCB Air Sample

Figures



Sample ID	Total PCBs
ATF-WP-N1-01	ND
ATF-WP-N1-02	ND
ATF-PC-N1-03	6.5 mg/kg

Sample ID	Total PCBs
ATF-WP-N7-01	5.7 µg/100cm^2
ATF-WP-N7-02	3.6 µg/100cm^2
ATF-PC-N7-03	3700 mg/kg
ATF-PC-N7-04	14000 mg/kg

Sample ID	Total PCBs
ATF-WP-N2-01	ND
ATF-WP-N2-02	ND
ATF-PC-N2-03	ND

Sample ID	Total PCBs
ATF-WP-N3-01	ND
ATF-WP-N3-02	ND
ATF-PC-N3-03	ND
ATF-PC-N3-04	ND

Sample ID	Total PCBs
ATF-AR-N3-04	83.3 ng/m^3

Sample ID	Total PCBs
ATF-WP-CHT-01	ND
ATF-PC-CHT-02	2000 mg/kg

Sample ID	Total PCBs
ATF-WP-CHT-03	ND
ATF-PC-CHT-04	680 mg/kg

Sample ID	Total PCBs
ATF-WP-N4-01	0.69 µg/100cm^2
ATF-WP-N4-02	9.0 µg/100cm^2
ATF-PC-N4-03	2000 mg/kg
ATF-PC-N4-04	41000 mg/kg

Sample ID	Total PCBs
ATF-WP-N5-01	0.45 µg/100cm^2
ATF-WP-N5-02	0.92 µg/100cm^2
ATF-PC-N5-03	8200 mg/kg
ATF-PC-N5-04	1800 J mg/kg

Sample ID	Total PCBs
ATF-WP-N6-01	1.2 µg/100cm^2
ATF-WP-N6-02	3.4 µg/100cm^2
ATF-PC-N6-03	3800 mg/kg
ATF-PC-N6-04	6100 mg/kg

Sample ID	Total PCBs
ATF-WP-N8-01	0.49 µg/100cm^2
ATF-WP-N8-02	0.47 µg/100cm^2
ATF-PC-N8-03	42000 mg/kg
ATF-PC-N8-04	14000 mg/kg

Sample ID	Total PCBs
ATF-WP-N9-01	0.14 J µg/100cm^2
ATF-WP-N9-02	2.7 µg/100cm^2
ATF-PC-N9-03	12000 mg/kg
ATF-PC-N9-04	14000 mg/kg

LEGEND:

- CONFINED SPACE ENTRY HATCH
- AIR SAMPLING LOCATION
- PCB PAINT CHIP/WIPE SAMPLING LOCATION (OCTOBER 2012)
- FULLY SCRAPED AND PAINTED
- ONLY BOTTOM SECTIONS SCRAPED AND PAINTED
- ONLY PAINTED – NEVER SCRAPED

SAMPLING NOMENCLATURE:

AR – AIR SAMPLE
ATF – ALTITUDE TEST FACILITY
C – CEILING OF DUCT PIPE (SEPTEMBER 2012)
F – FLOOR OF DUCT PIPE (SEPTEMBER 2012)
N – INTERIOR TO AIR DUCT
PC – PAINT CHIP SAMPLE
T – EXTERIOR TO AIR DUCT
W – WALL OF DUCT PIPE (SEPTEMBER 2012)
WP – WIPE SAMPLE

NOTE:

1. SAMPLING LOCATIONS APPROXIMATE.

NOT TO SCALE

GE-AVIATION
CINCINNATI, OHIO

ATF DUCTS - UPPER LEVEL INTERIOR SAMPLING LOCATIONS AND DATA RESULTS

ARCADIS

FIGURE
1A

CITY: SYRACUSE, NY DIV/GROUP: ENVCAD DB: L.POSENAUER LD:(Opt) PIC:(Opt) PM: C.AVERILL TM:(Opt) LYR:(Opt)ON=*;OFF=*REF*
V:\ENVCAD\SYRACUSE\ACT\CB003123\1000\00001\DWG\31231C07.dwg LAYOUT: 1A SAVED: 11/15/2012 8:36 AM ACADVER: 18.1S (LMS TECH) PAGESETUP: ---- PLOTSTYLETABLE: PLTFULL.CTB PLOTTED: 11/16/2012 8:33 AM BY: POSENAUER, LISA
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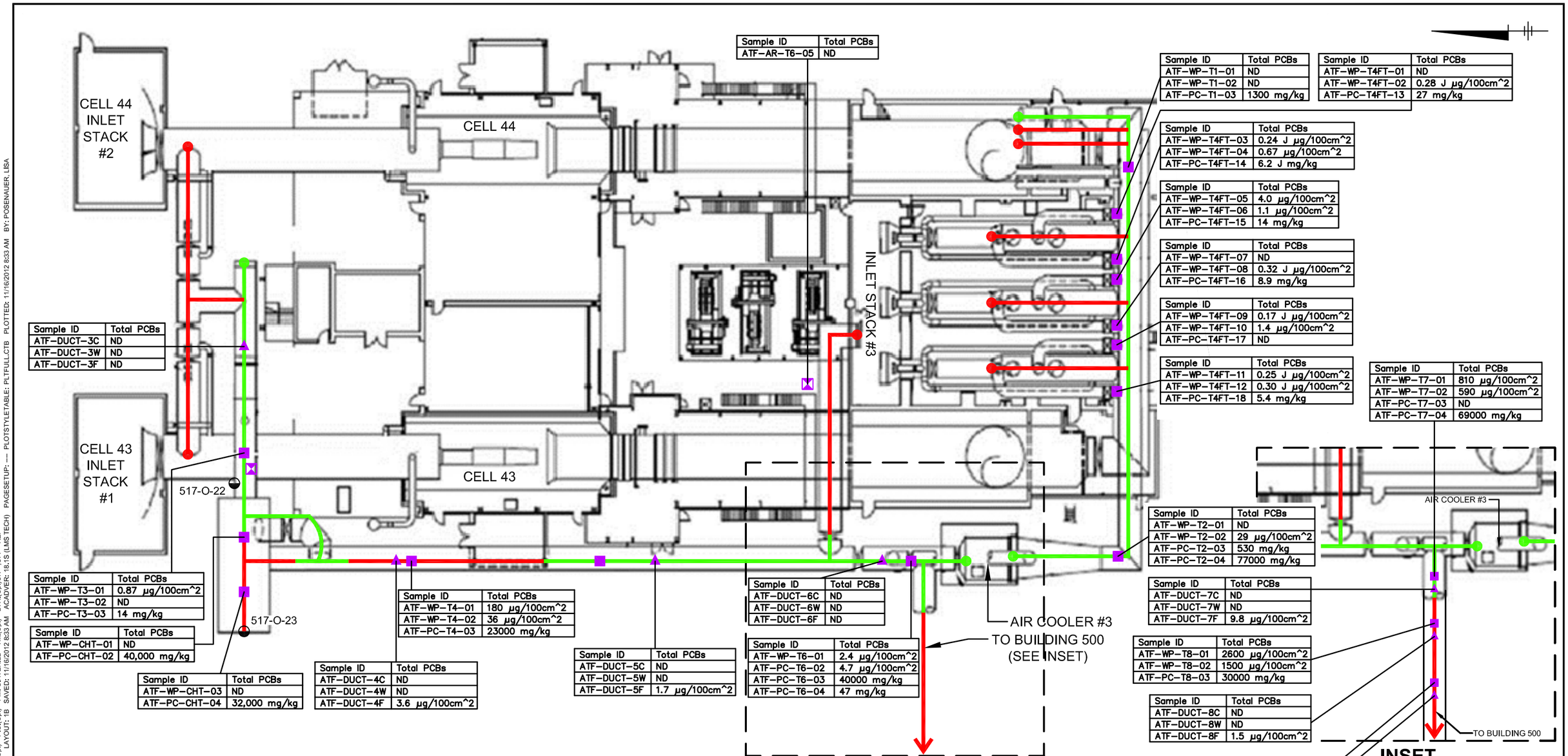

Sample ID	Total PCBs
ATF-AR-T6-05	ND

Sample ID	Total PCBs
ATF-WP-T1-01	ND
ATF-WP-T1-02	ND
ATF-PC-T1-03	1300 mg/kg

Sample ID	Total PCBs
ATF-WP-T4FT-01	ND
ATF-WP-T4FT-02	0.28 J µg/100cm^2
ATF-PC-T4FT-13	27 mg/kg

Sample ID	Total PCBs
ATF-WP-T4FT-03	0.24 J µg/100cm^2
ATF-WP-T4FT-04	0.67 µg/100cm^2
ATF-PC-T4FT-14	6.2 J mg/kg

Sample ID	Total PCBs
ATF-WP-T4FT-05	4.0 µg/100cm^2
ATF-WP-T4FT-06	1.1 µg/100cm^2
ATF-PC-T4FT-15	14 mg/kg

Sample ID	Total PCBs
ATF-WP-T4FT-07	ND
ATF-WP-T4FT-08	0.32 J µg/100cm^2
ATF-PC-T4FT-16	8.9 mg/kg

Sample ID	Total PCBs
ATF-WP-T4FT-09	0.17 J µg/100cm^2
ATF-WP-T4FT-10	1.4 µg/100cm^2
ATF-PC-T4FT-17	ND

Sample ID	Total PCBs
ATF-WP-T4FT-11	0.25 J µg/100cm^2
ATF-WP-T4FT-12	0.30 J µg/100cm^2
ATF-PC-T4FT-18	5.4 mg/kg

Sample ID	Total PCBs
ATF-DUCT-3C	ND
ATF-DUCT-3W	ND
ATF-DUCT-3F	ND

Sample ID	Total PCBs
ATF-WP-T7-01	810 µg/100cm^2
ATF-WP-T7-02	590 µg/100cm^2
ATF-PC-T7-03	ND
ATF-PC-T7-04	69000 mg/kg

Sample ID	Total PCBs
ATF-WP-T2-01	ND
ATF-WP-T2-02	29 µg/100cm^2
ATF-PC-T2-03	530 mg/kg
ATF-PC-T2-04	77000 mg/kg

Sample ID	Total PCBs
ATF-WP-T3-01	0.87 µg/100cm^2
ATF-WP-T3-02	ND
ATF-PC-T3-03	14 mg/kg

Sample ID	Total PCBs
ATF-WP-CHT-01	ND
ATF-PC-CHT-02	40,000 mg/kg

Sample ID	Total PCBs
ATF-WP-CHT-03	ND
ATF-PC-CHT-04	32,000 mg/kg

Sample ID	Total PCBs
ATF-WP-T4-01	180 µg/100cm^2
ATF-WP-T4-02	36 µg/100cm^2
ATF-PC-T4-03	23000 mg/kg

Sample ID	Total PCBs
ATF-DUCT-4C	ND
ATF-DUCT-4W	ND
ATF-DUCT-4F	3.6 µg/100cm^2

Sample ID	Total PCBs
ATF-DUCT-5C	ND
ATF-DUCT-5W	ND
ATF-DUCT-5F	1.7 µg/100cm^2

Sample ID	Total PCBs
ATF-DUCT-6C	ND
ATF-DUCT-6W	ND
ATF-DUCT-6F	ND

Sample ID	Total PCBs
ATF-WP-T6-01	2.4 µg/100cm^2
ATF-PC-T6-02	4.7 µg/100cm^2
ATF-PC-T6-03	40000 mg/kg
ATF-PC-T6-04	47 mg/kg

Sample ID	Total PCBs
ATF-DUCT-7C	ND
ATF-DUCT-7W	ND
ATF-DUCT-7F	9.8 µg/100cm^2

Sample ID	Total PCBs
ATF-WP-T8-01	2600 µg/100cm^2
ATF-WP-T8-02	1500 µg/100cm^2
ATF-PC-T8-03	30000 mg/kg

Sample ID	Total PCBs
ATF-DUCT-8C	ND
ATF-DUCT-8W	ND
ATF-DUCT-8F	1.5 µg/100cm^2

Sample ID	Total PCBs
ATF-WP-T9-01	140 µg/100cm^2
ATF-WP-T9-02	2900 µg/100cm^2
ATF-PC-T9-03	28000 mg/kg
ATF-PC-T9-04	45000 mg/kg

Sample ID	Total PCBs
ATF-DUCT-9C	ND
ATF-DUCT-9W	ND
ATF-DUCT-9F	10 µg/100cm^2

NOT TO SCALE

LEGEND:

- CONFINED SPACE ENTRY HATCH
- AIR SAMPLING LOCATION
- PCB PAINT CHIP/WIPE SAMPLING LOCATION (OCTOBER 2012)
- PCB WIPE SAMPLING LOCATION (SEPTEMBER 2012)
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NOTE:

1. SAMPLING LOCATIONS APPROXIMATE.

GE-AVIATION
CINCINNATI, OHIO

ATF DUCTS - UPPER LEVEL EXTERIOR SAMPLING LOCATIONS AND DATA RESULTS

ARCADIS

FIGURE
1B

CITY: SYRACUSE, NY DIV/GROUP: ENVCAD DB: L.POSENAUER LD:(Opt) PIC:(Opt) PM: C.AVERILL TM:(Opt) LYR:(Opt)On=*;Off=*REF*
V:\ENVCAD\SYRACUSE\ACT\C\B0031231\0000\00001\DWG\31231C08.dwg LAYOUT: 1B SAVED: 11/16/2012 8:33 AM ACADVER: 18.1S (LMS TECH) PAGESETUP: ---- PLOTSTYLETABLE: PLTFULL.CTB PLOTTED: 11/16/2012 8:33 AM BY: POSENAUER, LISA
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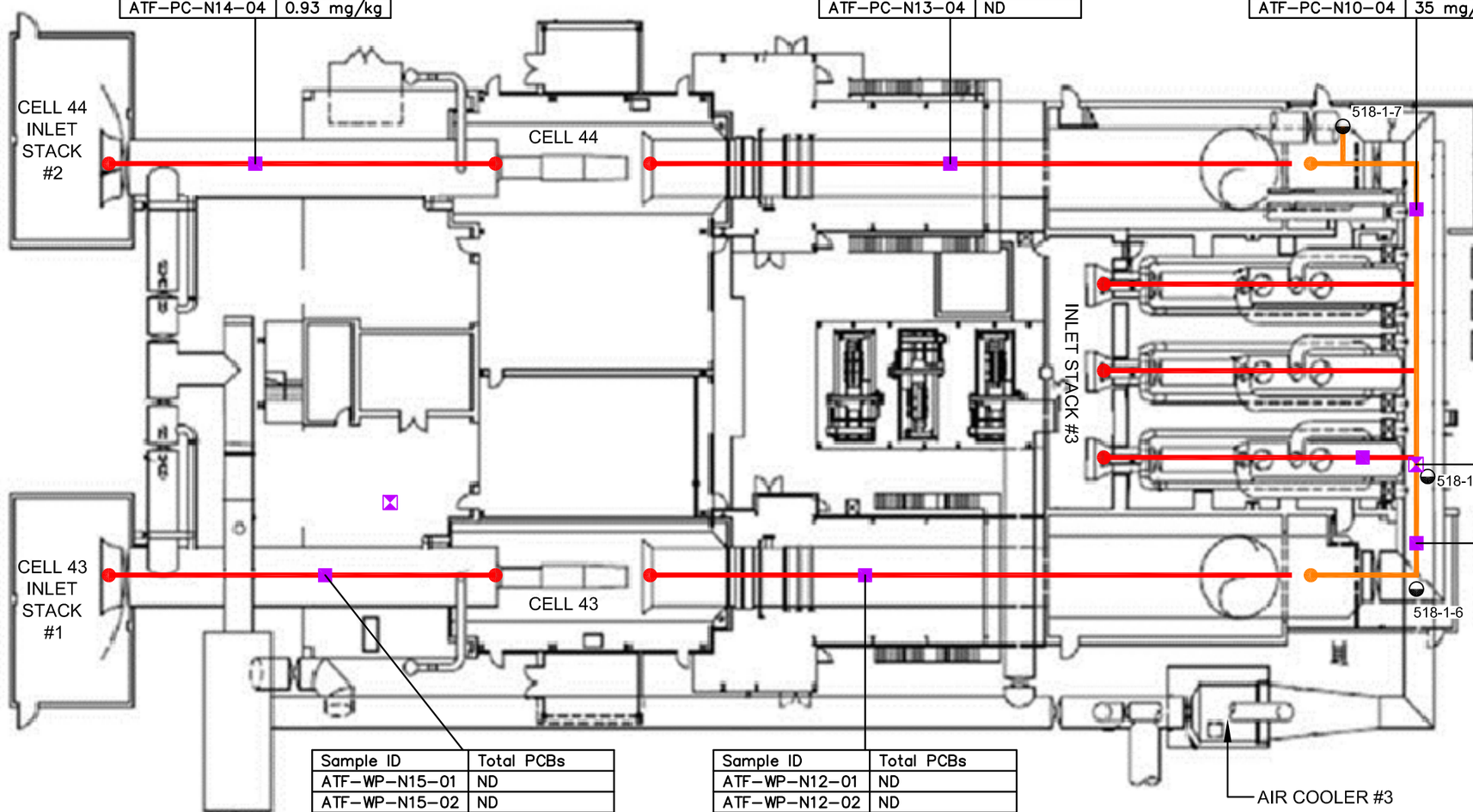

Sample ID	Total PCBs
ATF–WP–N14–01	ND
ATF–WP–N14–02	ND
ATF–PC–N14–03	0.96 mg/kg
ATF–PC–N14–04	0.93 mg/kg

Sample ID	Total PCBs
ATF–WP–N13–01	ND
ATF–WP–N13–02	ND
ATF–PC–N13–03	ND
ATF–PC–N13–04	ND

Sample ID	Total PCBs
ATF–WP–N10–01	2.2 µg/100cm^2
ATF–WP–N10–02	0.14 J µg/100cm^2
ATF–PC–N10–03	8.2 mg/kg
ATF–PC–N10–04	35 mg/kg

Sample ID	Total PCBs
ATF–AR–N11–02	ND

Sample ID	Total PCBs
ATF–WP–N11–01	3.1 µg/100cm^2
ATF–WP–N11–02	0.39 J µg/100cm^2
ATF–PC–N11–03	2.1 mg/kg
ATF–PC–N11–04	40 mg/kg

Sample ID	Total PCBs
ATF–WP–N15–01	ND
ATF–WP–N15–02	ND
ATF–PC–N15–03	8.2 mg/kg
ATF–PC–N15–04	4.4 mg/kg

Sample ID	Total PCBs
ATF–WP–N12–01	ND
ATF–WP–N12–02	ND
ATF–PC–N12–03	0.91 mg/kg
ATF–PC–N12–04	0.45 mg/kg

LEGEND:

- CONFINED SPACE ENTRY HATCH
- AIR SAMPLING LOCATION
- PCB PAINT CHIP/WIPE SAMPLING LOCATION (OCTOBER 2012)
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- ONLY BOTTOM SECTIONS SCRAPED AND PAINTED
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SAMPLING NOMENCLATURE:

AR – AIR SAMPLE

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PC – PAINT CHIP SAMPLE

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WP – WIPE SAMPLE

NOTE:

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NOT TO SCALE

GE-AVIATION
CINCINNATI, OHIO

ATF DUCTS - LOWER LEVEL INTERIOR SAMPLING LOCATIONS AND DATA RESULTS

ARCADIS

FIGURE
2A

CITY: SYRACUSE, NY DIV/GROUP: ENVCAD DB: L.POSENAUER LD:(Opt) PIC:(Opt) PM: C.AVERILL TM:(Opt) LYR:(Opt)ON=*;OFF=*REF*
V:\ENVCAD\SYRACUSE\ACT\CIB\0031231\0000\00001\DWG\31231C05.dwg LAYOUT: 2A SAVED: 11/16/2012 8:32 AM ACADVER: 18.1S (LMS TECH) PAGESETUP: ---- PLOTSTYLETABLE: PLTFULL.CTB PLOTTED: 11/16/2012 8:32 AM BY: POSENAUER, LISA
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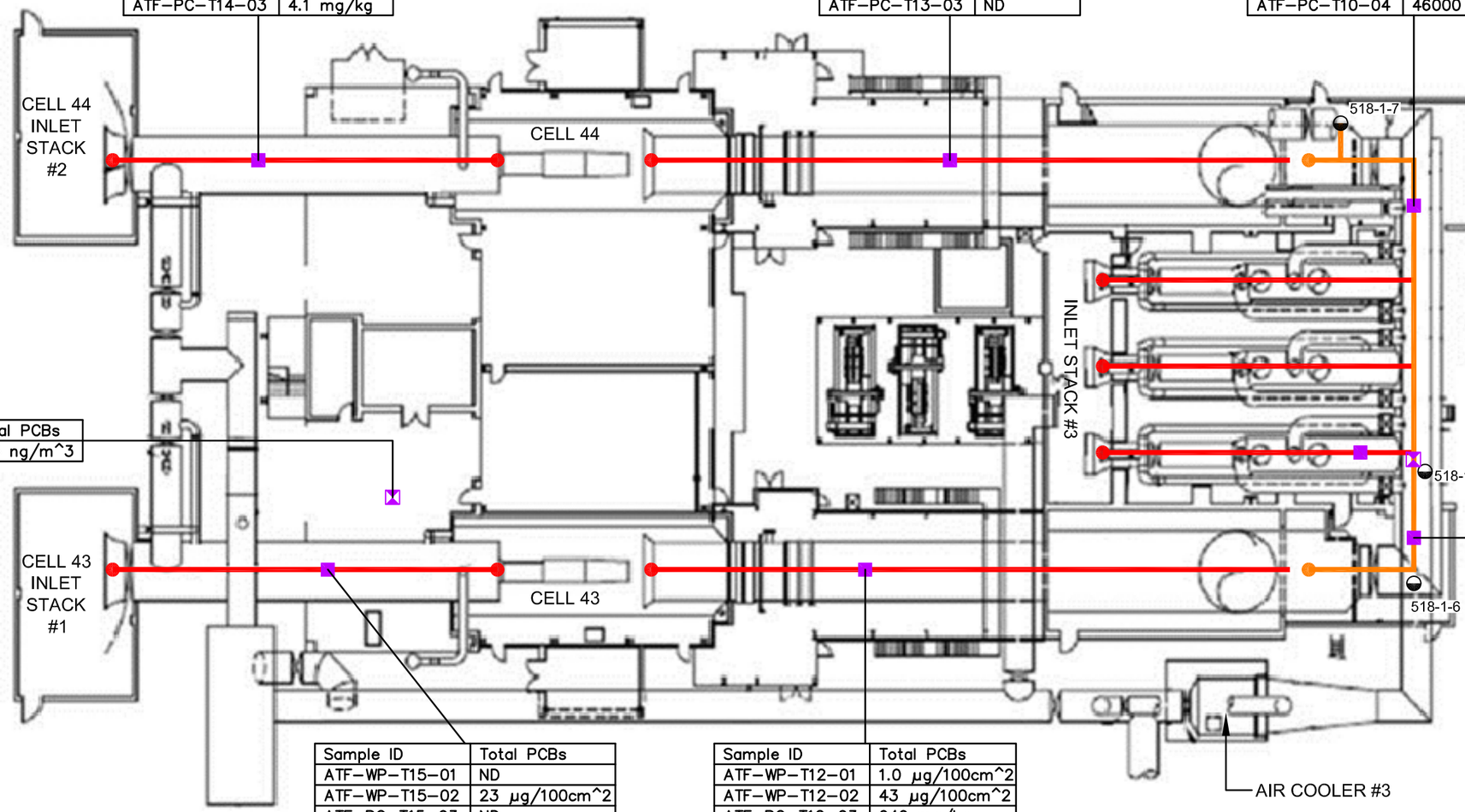

Sample ID	Total PCBs
ATF–WP–T14–01	ND
ATF–WP–T14–02	ND
ATF–PC–T14–03	4.1 mg/kg

Sample ID	Total PCBs
ATF–WP–T13–01	ND
ATF–WP–T13–02	ND
ATF–PC–T13–03	ND

Sample ID	Total PCBs
ATF–WP–T10–01	37 µg/100cm^2
ATF–WP–T10–02	ND
ATF–PC–T10–03	95000 J mg/kg
ATF–PC–T10–04	46000 mg/kg

Sample ID	Total PCBs
ATF–AR–T15–03	125 ng/m^3

Sample ID	Total PCBs
ATF–WP–T11–01	440 µg/100cm^2
ATF–WP–T11–02	760 µg/100cm^2
ATF–PC–T11–03	100000 mg/kg
ATF–PC–T11–04	80000 mg/kg

Sample ID	Total PCBs
ATF–WP–T15–01	ND
ATF–WP–T15–02	23 µg/100cm^2
ATF–PC–T15–03	ND
ATF–PC–T15–04	9200 mg/kg

Sample ID	Total PCBs
ATF–WP–T12–01	1.0 µg/100cm^2
ATF–WP–T12–02	43 µg/100cm^2
ATF–PC–T12–03	640 mg/kg

LEGEND:

- CONFINED SPACE ENTRY HATCH
- AIR SAMPLING LOCATION
- PCB PAINT CHIP/WIPE SAMPLING LOCATION (OCTOBER 2012)
- FULLY SCRAPED AND PAINTED
- ONLY BOTTOM SECTIONS SCRAPED AND PAINTED
- ONLY PAINTED – NEVER SCRAPED

SAMPLING NOMENCLATURE:

AR – AIR SAMPLE

ATF – ALTITUDE TEST FACILITY

N – INTERIOR TO AIR DUCT

PC – PAINT CHIP SAMPLE

T – EXTERIOR TO AIR DUCT

WP – WIPE SAMPLE

NOTE:

1. SAMPLING LOCATIONS APPROXIMATE.

NOT TO SCALE

GE-AVIATION
CINCINNATI, OHIO

ATF DUCTS - LOWER LEVEL EXTERIOR SAMPLING LOCATIONS AND DATA RESULTS

ARCADIS

FIGURE
2B

CITY: SYRACUSE, NY DIV/GROUP: ENVCAD DB: L.POSENAUER LD:(Opt) PIC:(Opt) PM: C.AVERILL TM:(Opt) LYR:(Opt)ON=*;OFF=*REF*
V:\ENVCAD\SYRACUSE\ACT\CIB\0031231\0000\00001\DWG\31231C06.dwg LAYOUT: 2B SAVED: 11/16/2012 8:34 AM ACADVER: 18.1S (LMS TECH) PAGESETUP: ---- PLOTSTYLETABLE: PLTFULL.CTB PLOTTED: 11/16/2012 8:34 AM BY: POSENAUER, LISA
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Attachment D

USEPA Region 5 December 19, 2012 Conditional Approval Letter

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:
L-8J

DEC 19 2012

Mr. Tony Aiello
Vice President, Assembly, Test & Overhaul
GE Aviation
One Neumann Way
Mail Drop G101
Cincinnati, Ohio 45215

Re: GE Aviation Short-Term Section 761.62(c) Submission

Dear Mr. Aiello:

This is in response to the General Electric (GE) petition (Submission) dated, November 16, 2012, for an interim risk-based alternative cleanup solution to address the presence of Polychlorinated Biphenyl (PCB) containing paint discovered on the inlet air induction system at the Altitude Test Facility (ATF) at GE's jet engine manufacturing facility in Cincinnati, Ohio.

Under TSCA §6(e), use of PCBs is banned unless specifically authorized or excepted by regulation. Authorizations are provided for under 40 CFR §761.30 and exceptions appear at §761.20. Use of any PCBs not authorized or excepted under these rules is prohibited in the United States. The ATF site contains PCB paint that exceeds the allowable levels under the federal PCB regulations at 40 Code of Federal Regulations (CFR) §761.20(a) and §761.62. Therefore, use of the PCB paint at the ATF is not permitted as it is not an authorized or excepted use under 40 CFR §§761.20 and 761.30.

GE requests an approval to address PCB contamination at the ATF under 40 CFR §761.62(c) for the limited purpose of conducting a small number of engine tests. In support of this request for approval, the submission provides characterization data the company previously collected at the site and presents a proposal for interim measures allowing GE to temporarily conduct four scheduled jet engine tests on behalf of the Department of the Navy in a manner that will not pose an unreasonable risk to human health and the environment during the duration of the tests, and until such time that GE can permanently remove the PCB containing paint from the inlet air induction system. Furthermore, GE provided documentation prepared by the Department of the Navy, dated November 21, 2012, requesting that GE expeditiously resume the scheduled engine tests to address safety of flight and engine reliability issues and promote the operational readiness for certain Navy aircraft. The United States Environmental Protection Agency considered the Navy's flight safety and operational readiness needs in reviewing GE's submission.

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GE specifically proposes the following activities under this interim action:

- The interior of the inlet air induction piping network will be double washed, double rinsed and double painted, consistent with 40 CFR §761.30(p).

- PCB M_L signs will be installed at appropriate locations, including entrance points to the ATF.

- The exterior of the inlet air induction pipes are, with the exception of certain fittings and appurtenances, covered with a multi-layer protective barrier, completed with aluminum sheathing. This covering will be maintained and the piping marked appropriately.

- GE employees and contractors have been made aware of the presence of PCB containing paint on the inlet air induction pipes and work practices are in place to limit their exposure to such paint.

- GE has implemented an operations plan for the management of wastes (e.g., PPE, etc.) as potentially PCB-containing for storage and disposal purposes.

GE requested and proposed that this interim solution be authorized only for the duration required to complete the scheduled jet engine tests (i.e., ending on July 31, 2013). Based on the EPA's review of the information provided in the Submission and subsequent technical discussion with GE's contractor, Arcadis, EPA finds that the proposed interim encapsulation of PCB-contaminated paint should effectively prevent direct exposure of these PCB surfaces to building users only during the four scheduled jet engine tests requested by GE on behalf of the Department of the Navy and, thus, should be protective of human health and the environment during these limited testing periods. Therefore, EPA approves the proposed interim action in accordance with the federal PCB regulations codified at 40 CFR §761.62(c) authorizing the Regional Administrator to approve a method to dispose of PCB Remediation Waste if it is found that the method will not pose an unreasonable risk of injury to human health or the environment. EPA emphasizes that this approval is for GE to conduct the proposed interim action only and this approval will expire on July 31, 2013. GE shall propose a long-term solution to EPA for the removal and disposal of the PCB Bulk Product waste paint, as described in Condition 17 of Attachment 1. EPA reserves its right to require additional investigation or mitigation measures at the ATF.

GE may proceed with its interim project in accordance with 40 CFR §761.62, the submission, and this approval, subject to the conditions of Attachment 1.

GE is responsible for ensuring continued compliance with all applicable provisions of the Toxic Substances Control Act (TSCA), the federal PCB regulations, and the conditions of this approval. Any departure from the conditions of this Approval or the Submittal must receive prior written authorization from this office. Further, this approval does not relieve GE from compliance with any other federal, State, or local regulatory requirements. This approval does not preclude EPA from initiating any enforcement action, including an action seeking civil penalties, suspension or termination of the approval for any violation, or requiring additional cleanup should GE fail to abide by this approval.

If you have any questions regarding this approval, please do not hesitate to call Peter Ramanauskas, of my staff, at (312) 886-7890.

Sincerely,

Margaret M. Guerriero
Director
Land and Chemicals Division

Enclosure

ATTACHMENT 1: PCB RISK-BASED APPROVAL CONDITIONS
GE AVIATION – ALTITUDE TEST FACILITY

GENERAL CONDITIONS

1) This Approval is granted under the authority of Section 6(e) of the Toxic Substances Control Act (TSCA), 15 U.S.C. §2605(e), and the Federal PCB Regulations at 40 CFR Part 761, and applies solely to the PCB Bulk Product Waste located at the site.

2) GE shall conduct on-site activities in accordance with the conditions of this Approval and the Submission.

3) In the event that the cleanup plan described in the Submission differs from the conditions specified in this Approval, the conditions of this Approval shall govern.

4) The terms and abbreviations used herein shall have the meanings as defined in 40 CFR §761.3 unless otherwise defined in this Approval.

5) All sampling and analysis conducted under this Approval will be performed in accordance with the EPA Region 5 RCRA Quality Assurance Project Plan Policy (April 1998) as appropriate for the site. EPA may audit laboratories selected by GE or require GE to purchase and have analyzed any Performance Evaluation ("PE") samples selected by EPA.

6) GE must comply with all applicable federal, state, and local regulations in the storage, handling, and disposal of all PCB wastes, including PCBs, PCB Items, and decontamination wastes generated under this Approval.

7) GE is responsible for the actions of all officers, employees, agents, contractors, subcontractors, and others who are involved in activities conducted under this Approval. If at any time GE has or receives information indicating that GE has failed, or may have failed, to comply with any provision of this Approval, it must report the information to EPA in writing within 24 hours of having or receiving the information.

8) This Approval does not constitute a determination by EPA that the transporters or disposal facilities selected by GE are authorized to conduct the activities set forth in the Submission. GE is responsible for ensuring that its selected transporters and disposal facilities are authorized to conduct these activities in accordance with all applicable federal, state, and local statutes and regulations.

9) This approval does not: 1) waive or compromise EPA's enforcement and regulatory authority; 2) release GE from compliance with any applicable requirements of federal, state, or local law; or 3) release GE from liability for, or otherwise resolve, any violations of federal, state, or local law.

INTERIM OPERATIONAL CONDITIONS

10) The interior of the inlet air induction piping network will be double washed, double rinsed and double painted, consistent with 40 CFR §761.30(p).

11) PCB M_L signs will be installed at appropriate locations, including entrance points to the ATF.

12) The exterior of the inlet air induction pipes are, with the exception of certain fittings and appurtenances, covered with a multi-layer protective barrier, completed with an aluminum sheathing. This covering will be maintained and the piping marked appropriately.

13) To ensure indoor air PCB concentrations remain protective for occupational exposures during the four engine tests, indoor air sampling shall be conducted during the interim action at locations outside of the control room but within the ATF where there is the potential for maximum exposure time for occupational workers. GE will notify EPA in writing of the location(s), rationales, and chosen methodology of the air sampling at the ATF during the interim action within 10 days of this Approval.

   i) Indoor air sampling shall be conducted in accordance with EPA Method TO-4A or TO-10A. Sufficient sample volumes shall be collected to provide a minimum laboratory reporting limit of $< 0.05\ \mu g/m^3$.

   ii) Analytical results of air sampling shall be submitted to EPA within 5 business days of the GE's receipt of results.

14) To the maximum extent practical, engineering controls, such as barriers, and removal techniques, such as the use of HEPA ventilated tools, shall be used during any removal processes required during the interim operations. In addition, to the maximum extent possible, disposable equipment and materials, including PPE, will be used to reduce the amount of decontamination necessary.

15) Any paints removed from the inlet air induction system shall be disposed off-site as PCB Bulk Product Waste per 40 CFR §761.62.

16) PCB waste at any concentration generated as a result of the activities described in the Submission shall be marked in accordance with 40 CFR §761.40; stored in a manner consistent with 40 CFR §761.65; and disposed of in accordance with 40 CFR §761.61 or §761.62, unless otherwise specified below.

   i) Decontamination wastes and residues shall be disposed of in accordance with 40 CFR § 761.79(g)(6).

   ii) Movable equipment, tools, and sampling equipment shall be decontaminated in accordance with either 40 CFR §761.79(b)(3)(i)(A), §761.79(b)(3)(ii)(A), or §761.79(c)(2).

   iii) PCB contaminated water generated during decontamination or dewatering shall be decontaminated in accordance with 40 CFR §761.79(b)(1) or disposed of under §761.60.

INSPECTION, MONITORING, MODIFICATION AND REVOCATION CONDITIONS

17) Within 45 days of the date of this Approval, GE shall submit for EPA's review and approval, a detailed work plan for the permanent removal of the PCB Bulk Product Waste paints on the inlet air induction system at the ATF.

18) GE shall allow any authorized representative of the Administrator of the EPA to inspect the site, inspect records, and take samples as may be necessary to determine compliance with the PCB

regulations and this Approval. Any refusal by GE to allow such an inspection (as authorized by Section 11 of TSCA) shall be grounds for revocation of this Approval.

19) Any proposed modification in the plan or specifications contained in the Submission or any departure from the conditions of this Approval without prior, written authorization from the EPA may result in revocation, suspension, and/or modification of the Approval, in addition to any other legal or equitable relief or remedy EPA may chose to pursue.

20) Any misrepresentation or omission of any material fact in the Submission or in any records or reports may result in EPA's revocation, suspension, and/or modification of the Approval, in addition to any other legal or equitable relief or remedy the EPA may chose to pursue.

RECORDKEEPING AND REPORTING CONDITIONS

21) GE shall prepare and maintain all records and documents required by 40 CFR Part 761, including, but not limited to, the records required under Subparts J and K in one centralized location. All records shall be made available for inspection to authorized representatives of EPA.

22) GE shall submit a Final Completion Report (Report) to EPA within 120 days of the completion of the activities described under the Submission and this Approval. At a minimum, this Report shall include: a discussion of the interim actions conducted, including any modifications that were made to the plan; indoor air sampling analytical results; copies of the accompanying analytical chains of custody; field and laboratory quality control/quality assurance checks; an estimate of any quantity of PCBs removed and disposed off-site; copies of manifests and/or bills of lading; and copies of certificates of disposal or similar certifications issued by the disposer, if applicable. The report shall also include a certification signed by a GE official verifying that the authorized activities have been implemented in accordance with this Approval and the Submission.

No record, report or communication required under this Approval shall qualify as a self-audit or voluntary disclosure under EPA audit, self-disclosure, or penalty policies.

Attachment E

Indoor Ambient Air PCB Monitoring Plan

1. Air Monitoring Results (2013-2014)

ARCADIS of New York, Inc.
6723 Towpath Road
P O Box 66
Syracuse
New York 13214-0066
Tel 315 446 9120
Fax 315 449 0017
www.arcadis-us.com

ENVIRONMENT

Peter Ramanauskas
U.S. EPA Region 5
77 W. Jackson Blvd
Chicago, IL 60604

Subject:
GE Aviation – Cincinnati/Air Test Facility
Data Summary of Initial Air Sampling Event – January 2013

Date:
February 8, 2013

Dear Mr. Ramanauskas:

On January 31, 2013, GE Aviation, an operating division of the General Electric Company (GE), performed air testing activities at the Altitude Test Facility (ATF) at GE's facility in Cincinnati, Ohio, in accordance with GE's PCB *Indoor Ambient Air Monitoring Plan During Short-Term Engine Testing Plan* (Air Monitoring Plan), submitted to EPA on January 8, 2013.

Air test sample ATF-AR-C43-01, located within the Test Cell #43 room of the ATF, and air test sample ATF-AR-CR2-01, located on the second floor of the compressor room, were both taken over an 8-hour interval. The jet engine being tested was operating for three and a half hours during the 8 hours that the air samples were being collected. For a number of technical reasons, the testing process for this engine has not yet included a period of 8 hours of uninterrupted operations.

Both air pumps were placed in a manner such that the air sample would be collected from the breathing zone. Calibration and preparation of air samples followed Method T0-10A: Compendium of Methods for Toxic Organic Air Pollution. The laboratory analytical results of the sampling event are provided in the Data Summary Table, attached as Table 1 and the sampling locations are provided on the attached Figure 1. As indicated in the attachments, the result for the sample near Test Cell #43 was 68.7 ng/m^3, and non-detect for the other sample (with an analytical detection limit of 41 ng/m^3).

Please do not hesitate to contact Jennifer Shea, Counsel for Environmental Affairs at GE Aviation, at (513) 243-4256 or Christopher Bell at Sidley Austin LLP at (713) 495-4508 if you have any questions.

Sincerely,

ARCADIS of New York, Inc.

John F. Novotny, PE
Senior Engineer

Attachments
Table 1
Figure 1

Copies:
Susan Perdomo, GE
Jennifer Shea, GE
Christopher Bell, Sidley Austin, LLP

Table 1
Data Summary - PCB Air Monitoring - January 2013

GE - Aviation - Altitude Test Facility
Cincinnati, Ohio

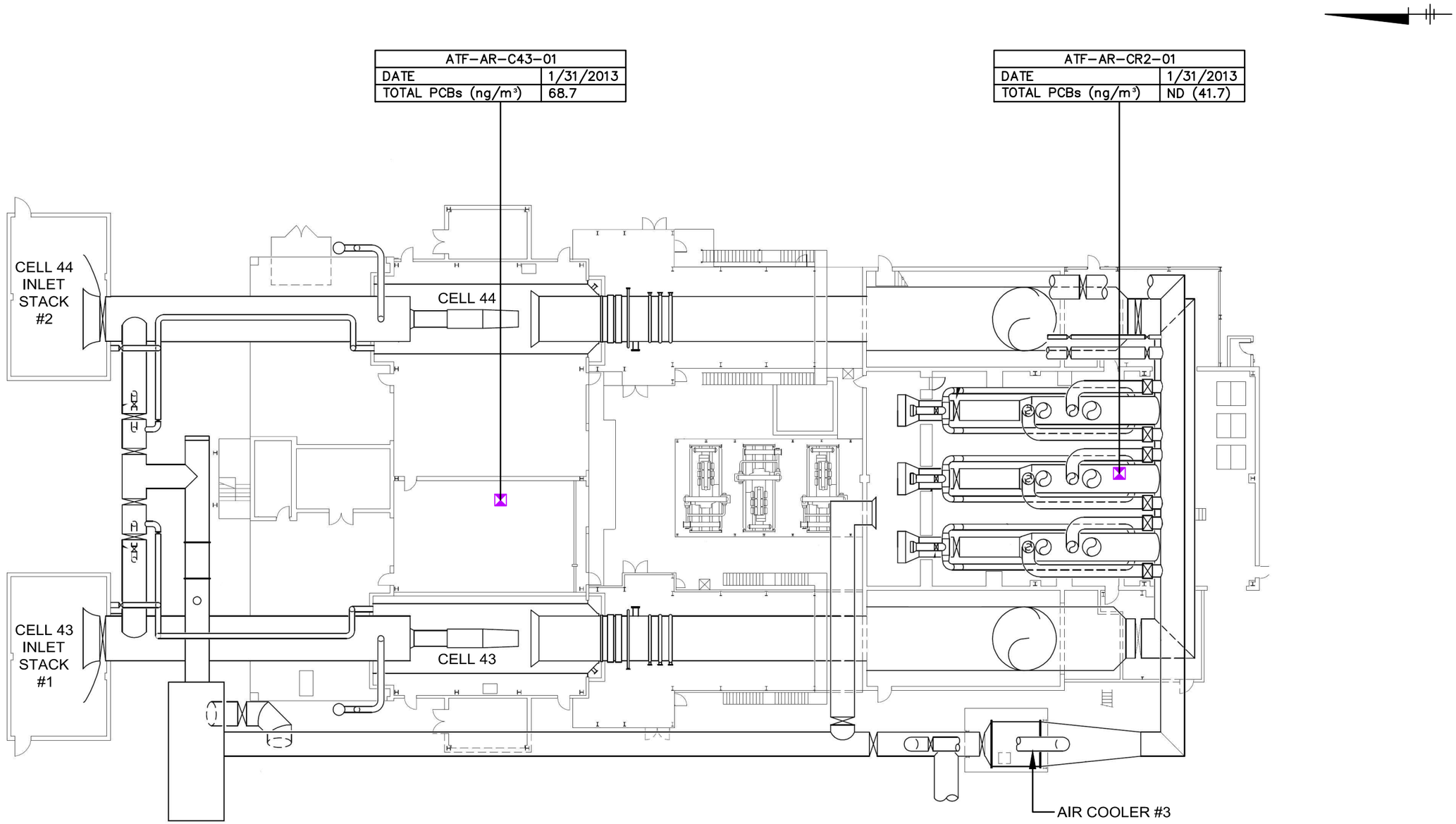
Sampling ID	Date Collected	Sample Type	Total PCBs (ng/m^3)	Location Description
Event 1				
ATF-AR-C43-01	1/31/2013	Air	68.7	Cell 43 open floor area
ATF-AR-CR2-01	1/31/2013	Air	ND (41.7)	Second floor of Compressor Room

Notes:

1. Samples collected by ARCADIS personnel and submitted to Pace Analytical Laboratory for analysis using USEPA Compendium Method TO-10A procedures.
2. Air pumps were set up at breathing zone height and collection was completed over an 8-hour interval at approximately 5 L/min resulting in approximately 2,400 L of air pulled through the puff for each sample.
3. Event 1 took place at the ATF on January 31, 2013.

Abbreviations:

ATF - Altitude Test Facility
AR - PCB air sample
C43 - test cell #43
CR2 - compressor room-second floor
PCBs - polychlorinated biphenyls
ng/m^3 - nanograms per cubic meter
ND - Non-detect (analytical detection limit shown in parenthesis)



NOT TO SCALE

LEGEND:

- AMBIENT PCB AIR MONITORING LOCATION

SAMPLING NOMENCLATURE:

ATF – ALTITUDE TEST FACILITY

AR – PCB AIR SAMPLE

C43 – TEST CELL #43

CR2 – COMPRESSOR ROOM SECOND FLOOR

NOTES:

1. SAMPLING LOCATIONS ARE APPROXIMATE.
2. ng/m³ – NANOGRAMS PER CUBIC METER
3. ND – NON-DETECT (ANALYTICAL DETECTION LIMIT SHOWN IN PARENTHESIS)

GE-AVIATION
CINCINNATI, OHIO

DATA SUMMARY - PCB RESULTS
AMBIENT PCB AIR MONITORING

ARCADIS

FIGURE
1

CITY: SYRACUSE, NY DIV/GROUP: ENVCAD DB: L.POSENAUER LD:(Opt) PIC:(Opt) PM: C.AVERILL TM:(Opt) LYR:(Opt)ON=*;OFF=*REF*
V:\ENVCAD\SYRACUSE\ACT\CIB\0031231\0000\00003\DWG\AIRMON\31231C01.dwg LAYOUT: 1 SAVED: 2/8/2013 9:26 AM ACADVER: 18.1S (LMS TECH) PAGESETUP: C:\LB-PDF-GMS PLOTSTYLETABLE: PLTFULL.CTB PLOTTED: 2/8/2013 9:26 AM BY: POSENAUER, LISA
XREFS: 31231X00 IMAGES: 31231X01.png

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ENVIRONMENT

Peter Ramanauskas
U.S. EPA Region 5
77 W. Jackson Blvd
Chicago, IL 60604

Subject:
GE Aviation – Cincinnati/Air Test Facility
Data Summary of Second Air Sampling Event – April 2013

Date:
April 29, 2013

Dear Mr. Ramanauskas:

On April 9, 2013, GE Aviation, an operating division of the General Electric Company (GE), performed air testing activities at the Altitude Test Facility (ATF) at GE's facility in Cincinnati, Ohio, in accordance with GE's PCB *Indoor Ambient Air Monitoring Plan During Short-Term Engine Testing Plan* (Air Monitoring Plan), submitted to EPA on January 8, 2013.

Air test sample ATF-AR-C44-01, located adjacent to the Test Cell #44 room of the ATF, and air test sample ATF-AR-CR2-02, located on the second floor of the compressor room, were both taken over an 8-hour interval. The jet engine being tested was operating for six and a half hours during the 8 hours that the air samples were being collected. For a number of technical reasons, the testing process for this engine has not yet included a period of 8 hours of uninterrupted operations.

Both air pumps were placed in a manner such that the air sample would be collected from the breathing zone. Calibration and preparation of air samples followed Method T0-10A: Compendium of Methods for Toxic Organic Air Pollution. The laboratory analytical results of the sampling event are provided in the Data Summary Table, attached as Table 1 and the sampling locations are provided on the attached Figure 1. As indicated in the attachments, the result for sample ATF-AR-C44-01 (collected adjacent to Test Cell #44) was 20.1 ng/m^3, and sample ATF-AR-CR2-02 (collected from the ATF compressor room) was 157 ng/m^3.

Please do not hesitate to contact Jennifer Shea, Counsel for Environmental Affairs at GE Aviation, at (513) 243-4256 or Christopher Bell at Sidley Austin LLP at (713) 495-4508 if you have any questions.

Sincerely,

ARCADIS of New York, Inc.

John F. Novotny, PE
Senior Engineer

Attachments
Table 1
Figure 1

Copies:
Susan Perdomo, GE
Jennifer Shea, GE
Christopher Bell, Sidley Austin, LLP

Table 1
Data Summary - PCB Air Monitoring - April 2013

GE - Aviation - Altitude Test Facility
Cincinnati, Ohio

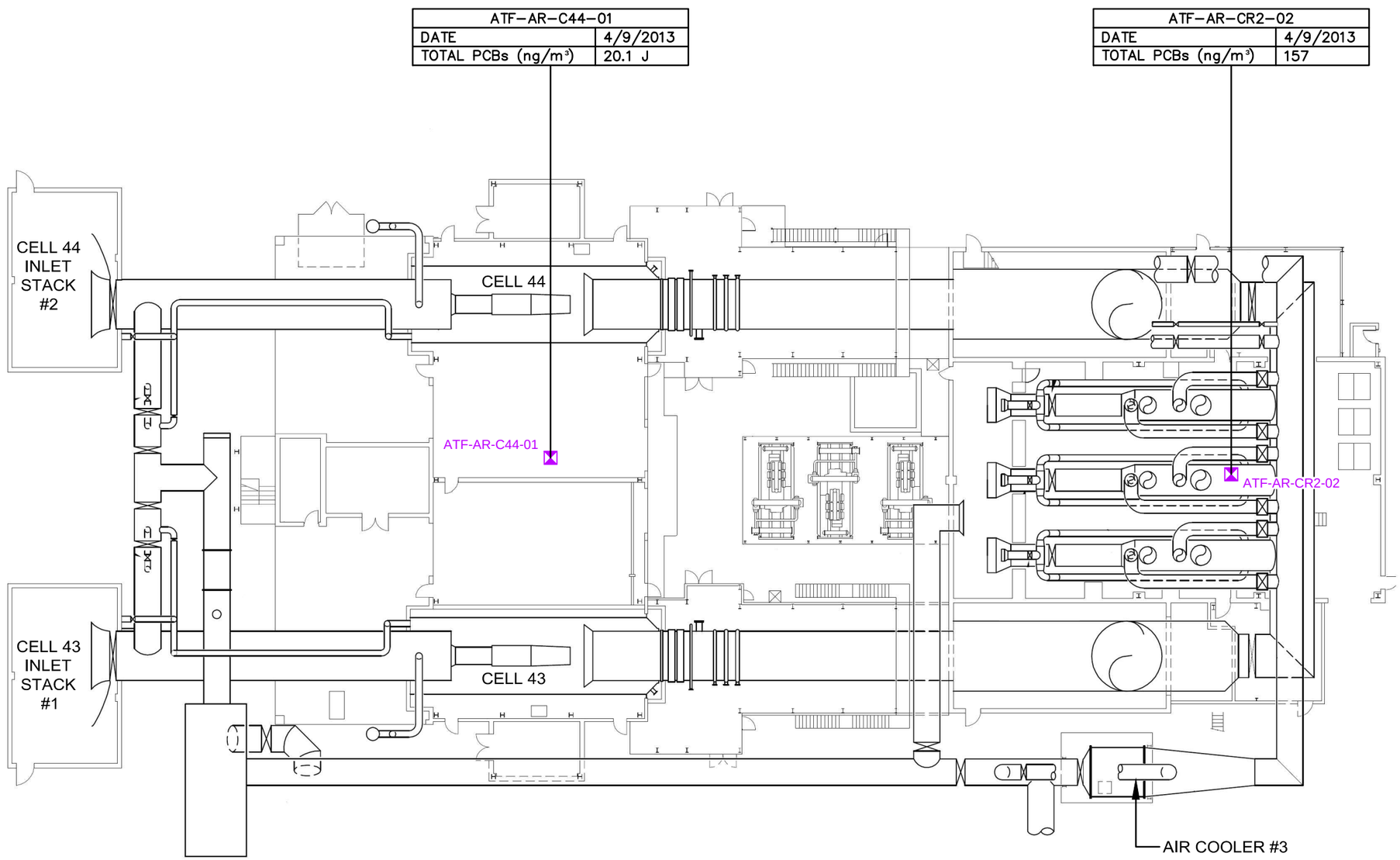
Sampling ID	Date Collected	Sample Type	Total PCBs (ng/m^3)	Location Description
Event 2				
ATF-AR-C44-01	4/9/2013	Air	20.1 J	Test Cell 44 open floor area
ATF-AR-CR2-02	4/9/2013	Air	157	Second floor of ATF Compressor Room

Notes:

1. Samples collected by ARCADIS personnel and submitted to Pace Analytical Laboratory for analysis using USEPA Compendium Method TO-10A procedures.
2. Air pumps were set up at breathing zone height and operated over an 8-hour interval at an air intake rate of approximately 5 L/min, resulting in approximately 2,400 L of air pulled through the puff for each sample.
3. Event 2 took place at the ATF on April 9, 2013.

Abbreviations:

ATF - Altitude Test Facility
AR - PCB air sample
C44 - Test Cell #44
CR2 - compressor room-second floor
PCBs - polychlorinated biphenyls
J - Denotes an estimated concentration. The concentration result is greater than or equal to the Method Detection Limit (MDL) but less than the Practical Quantitation Limit.
ng/m^3 - nanograms per cubic meter



NOT TO SCALE

LEGEND:

- ☒ AMBIENT PCB AIR MONITORING LOCATION

SAMPLING NOMENCLATURE:

ATF – ALTITUDE TEST FACILITY

AR – PCB AIR SAMPLE

C43 – TEST CELL #43

C44 – TEST CELL #44

CR2 – COMPRESSOR ROOM SECOND FLOOR

NOTES:

1. SAMPLING LOCATIONS ARE APPROXIMATE.
2. SAMPLES ATF–AR–CR2–01 AND ATF–AR–CR2–02 WERE COLLECTED FROM THE SAME LOCATION.
3. ng/m³ – NANOGRAMS PER CUBIC METER
4. J – DENOTES AN ESTIMATED CONCENTRATION.

GE-AVIATION
CINCINNATI, OHIO
AIR TEST SUMMARY REPORT

DATA SUMMARY - PCB RESULTS
AMBIENT PCB AIR MONITORING

ARCADIS

FIGURE
1

CITY: SYRACUSE, NY DIV/GROUP: ENVCAD DB: L.POSENAUER LD:(Opt) PIC:(Opt) PM: C.AVERILL TM:(Opt) LYR:(Opt)ON=*;OFF=*REF*
V:\ENVCAD\SYRACUSE\ACT\CB\0031231\0000\00003\DWG\ATSR31231C02.dwg LAYOUT: 1 SAVED: 4/29/2013 12:39 PM ACADVER: 18.1S (LMS TECH) PAGESETUP: C-LB-PDF-GMS PLOTSTYLETABLE: PLTFULL.CTB PLOTTED: 4/29/2013 12:39 PM BY: POSENAUER, LISA
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ENVIRONMENT

Peter Ramanauskas
U.S. EPA Region 5
77 W. Jackson Blvd
Chicago, IL 60604

Subject:
GE Aviation – Altitude Test Facility
Data Summary of Third Air Sampling Event – May 2013

Date:
June 20, 2013

Dear Mr. Ramanauskas:

On May 30, 2013, GE Aviation, an operating division of the General Electric Company (GE), performed air testing activities at the Altitude Test Facility (ATF) at GE's facility in Cincinnati, Ohio, in accordance with GE's PCB *Indoor Ambient Air Monitoring Plan During Short-Term Engine Testing Plan* (Air Monitoring Plan), submitted to EPA on January 8, 2013. GE received the laboratory report containing the analytical results from the evaluation of the samples on June 13, 2013.

Air test sample ATF-AR-C43-02, located adjacent to the Test Cell #43 room of the ATF, and air test sample ATF-AR-CR2-03, located on the second floor of the compressor room, were both taken over an 8-hour interval. The jet engine being tested was in operation for a full 8 hours during which the air samples were collected.

Both air pumps were placed in a manner such that the air sample would be collected from the breathing zone. Calibration and preparation of air samples followed Method T0-10A: Compendium of Methods for Toxic Organic Air Pollution. The laboratory analytical results of the sampling event are provided in the Data Summary Table, attached as Table 1 and the sampling locations are provided on the attached Figure 1. As indicated in the attachments, sample ATF-AR-C43-02 (collected adjacent to Test Cell #43) had no PCBs detected, and sample ATF-AR-CR2-02 (collected from the ATF compressor room) had PCBs detected at 157.3 ng/m^3.

Please do not hesitate to contact John Rumpf, Counsel for Environmental Affairs at GE Aviation, at (513) 243-4256 or Christopher Bell at Sidley Austin LLP at (713) 495-4508 if you have any questions.

Sincerely,

ARCADIS of New York, Inc.

John F. Novotny, PE
Senior Engineer

Attachments
Table 1
Figure 1

Copies:
Susan Perdomo, GE
John Rumpf, GE
Christopher Bell, Sidley Austin, LLP

Table 1
Data Summary - PCB Air Monitoring - May 2013

GE - Aviation - Altitude Test Facility
Cincinnati, Ohio

Sampling ID	Date Collected	Sample Type	Total PCBs (ng/m^3)	Location Description
Event 3				
ATF-AR-C43-02	5/30/2013	Air	ND	Test Cell 43 open floor area
ATF-AR-CR2-03	5/30/2013	Air	157.3	Second floor of ATF Compressor Room

Notes:

1. Samples collected by ARCADIS personnel and submitted to Pace Analytical Laboratory for analysis using USEPA Compendium Method TO-10A procedures.
2. Air pumps were set up at breathing zone height and operated over an 8-hour interval at an air intake rate of approximately 5 L/min, resulting in approximately 2,400 L of air pulled through the puff for each sample.
3. Event 3 took place at the ATF on May 30, 2013.

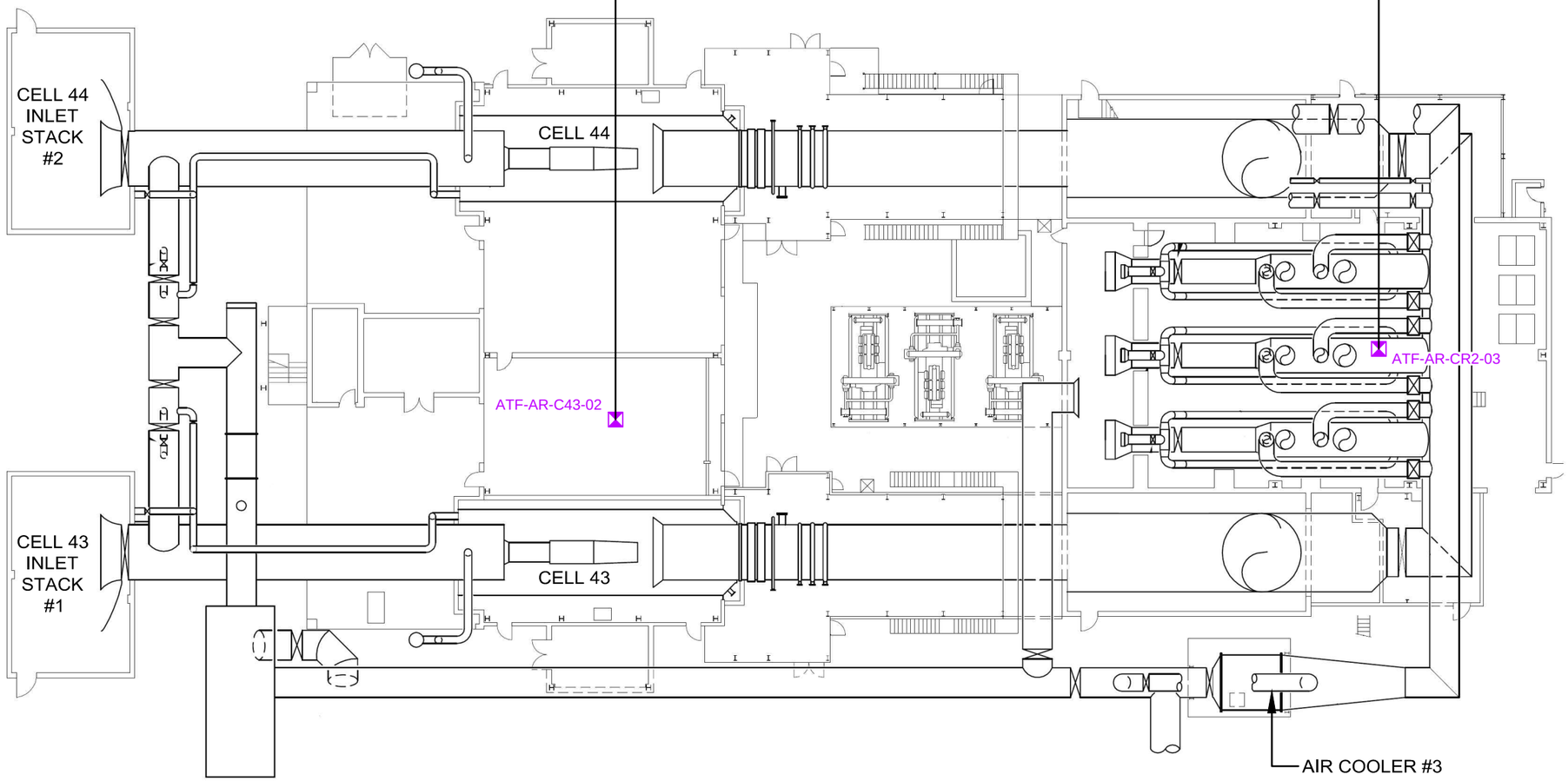
Abbreviations:

ATF - Altitude Test Facility
AR - PCB air sample
C43 - Test Cell #43
CR2 - compressor room-second floor
PCBs - polychlorinated biphenyls
ND - Denotes analyte not detected at concentration greater than or equal to the Reporting Limit (RL).
ng/m^3 - nanograms per cubic meter

RELEASED
DATE 2/15/20
RIN # 2019-00975
INITIALS JW

ATF–AR–C43–02	
DATE	5/30/2013
TOTAL PCBs (ng/m³)	ND

ATF–AR–CR2–03	
DATE	5/30/2013
TOTAL PCBs (ng/m³)	157.3



NOT TO SCALE

LEGEND:

AMBIENT PCB AIR MONITORING LOCATION

SAMPLING NOMENCLATURE:

ATF – ALTITUDE TEST FACILITY

AR – PCB AIR SAMPLE

C43 – TEST CELL #43

C44 – TEST CELL #44

CR2 – COMPRESSOR ROOM SECOND FLOOR

NOTES:

1. SAMPLING LOCATIONS ARE APPROXIMATE.
2. ng/m³ – NANOGRAMS PER CUBIC METER
3. ND = INDICATES PCBs WERE NOT DETECTED.

GE-AVIATION
CINCINNATI, OHIO
AIR TEST SUMMARY REPORT

DATA SUMMARY - PCB RESULTS
AMBIENT PCB AIR MONITORING

ARCADIS

FIGURE
1

CITY: SYRACUSE, NY DIV/GROUP: ENVCAD DB: L.POSENAUER LD:(Opt) PIC:(Opt) PM: C.AVERILL TM:(Opt) LYR:(Opt)ON=*;OFF=*REF*
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ENVIRONMENT

Peter Ramanauskas
U.S. EPA Region 5
77 W. Jackson Blvd
Chicago, IL 60604

Subject:
GE Aviation – Altitude Test Facility
Data Summary of Fourth Air Sampling Event – July 2013

Date:
August 2, 2013

Dear Mr. Ramanauskas:

On July 11, 2013, GE Aviation, an operating division of the General Electric Company (GE), performed air testing activities at the Altitude Test Facility (ATF) at GE's facility in Cincinnati, Ohio, in accordance with GE's PCB *Indoor Ambient Air Monitoring Plan During Short-Term Engine Testing Plan* (Air Monitoring Plan), submitted to EPA on January 8, 2013. GE received the laboratory report containing the analytical results from the evaluation of the samples on July 26, 2013.

Air test sample ATF-AR-C44-02, located adjacent to the Test Cell #44 room of the ATF, and air test sample ATF-AR-CR2-04, located on the second floor of the compressor room, were both taken over an 8-hour interval. The jet engine being tested was in operation for four and a half hours during the 8 hours that the air samples were being collected.

Both air pumps were placed in a manner such that the air sample would be collected from the breathing zone. Calibration and preparation of air samples followed Method T0-10A: Compendium of Methods for Toxic Organic Air Pollution. The laboratory analytical results of the sampling event are provided in the Data Summary Table, attached as Table 1 and the sampling locations are provided on the attached Figure 1. As indicated in the attachments, sample ATF-AR-C44-02 (collected adjacent to Test Cell #44) had PCBs detected at 58.0 ng/m^3, and sample ATF-AR-CR2-04 (collected from the ATF compressor room) had PCBs detected at 219.4 ng/m^3.

Please do not hesitate to contact John Rumpf, Counsel for Environmental Affairs at GE Aviation, at (513) 243-4256 or Christopher Bell at Sidley Austin LLP at (713) 495-4508 if you have any questions.

Sincerely,

ARCADIS of New York, Inc.

John F. Novotny, PE
Senior Engineer

Attachments
Table 1
Figure 1

Copies:
Susan Perdomo, GE
John Rumpf, GE
Christopher Bell, Sidley Austin, LLP

RELEASED
DATE 2/15/20
RIN # 2019-009175
INITIALS SJW

Table 1
Data Summary - PCB Air Monitoring - July 2013

GE - Aviation - Altitude Test Facility
Cincinnati, Ohio

Sampling ID	Date Collected	Sample Type	Total PCBs (ng/m^3)	Location Description
Event 4				
ATF-AR-C44-02	7/11/2013	Air	58.0	Test Cell 44 open floor area
ATF-AR-CR2-04	7/11/2013	Air	219.4	Second floor of ATF Compressor Room

Notes:

1. Samples collected by ARCADIS personnel and submitted to Pace Analytical Laboratory for analysis using USEPA Compendium Method TO-10A procedures.
2. Air pumps were set up at breathing zone height and operated over an 8-hour interval at an air intake rate of approximately 5 L/min, resulting in approximately 2,400 L of air pulled through the puff for each sample.
3. Event 4 took place at the ATF on July 11, 2013.

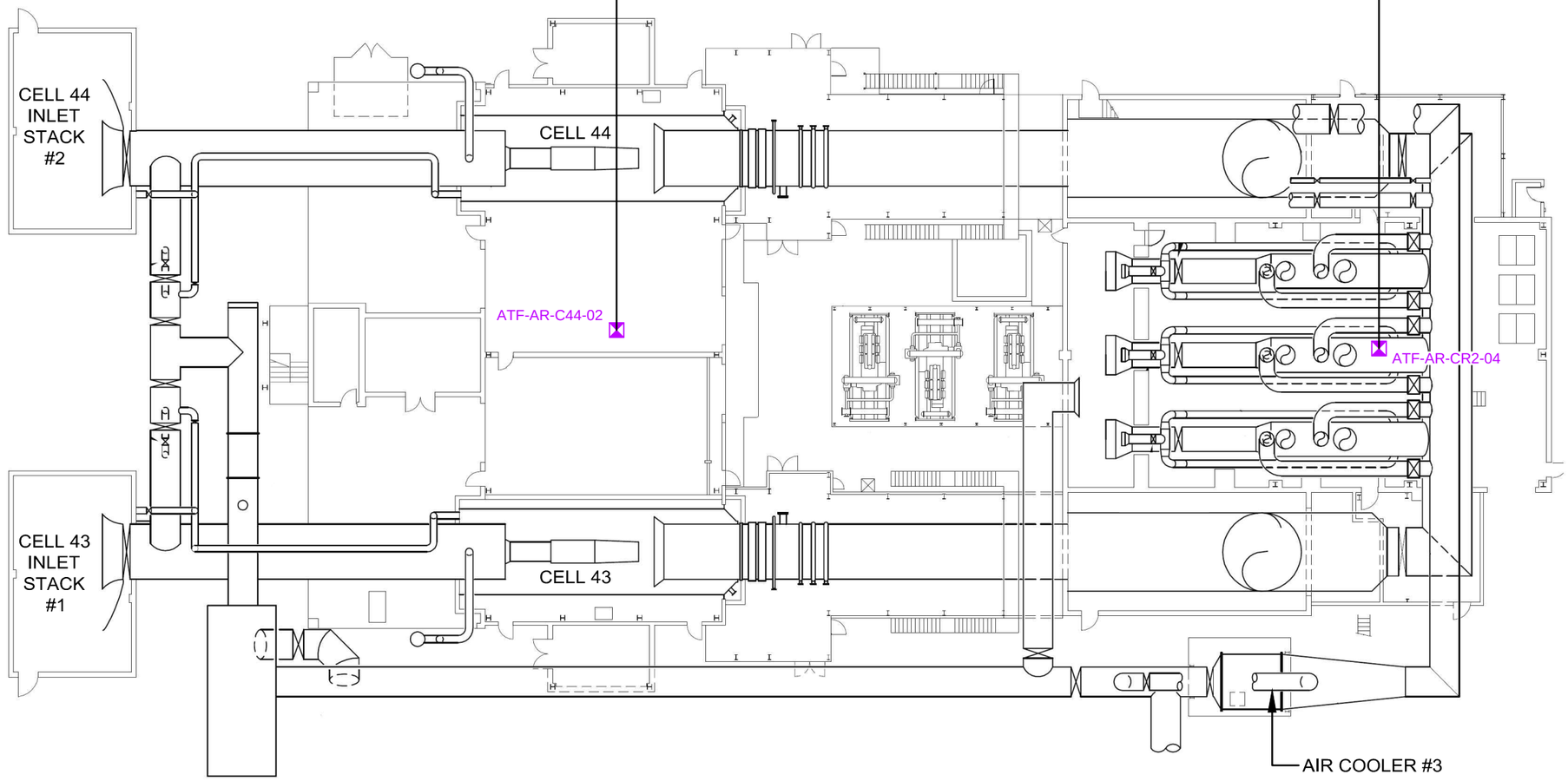
Abbreviations:

ATF - Altitude Test Facility
AR - PCB air sample
C44 - Test Cell #44
CR2 - compressor room-second floor
PCBs - polychlorinated biphenyls
ng/m^3 - nanograms per cubic meter

RELEASED
DATE 2/15/20
RIN # 2019-009175
INITIALS

ATF-AR-C44-02	
DATE	7/11/2013
TOTAL PCBs (ng/m³)	58.0

ATF-AR-CR2-04	
DATE	7/11/2013
TOTAL PCBs (ng/m³)	219.4



NOT TO SCALE

LEGEND:

AMBIENT PCB AIR MONITORING LOCATION

SAMPLING NOMENCLATURE:

ATF – ALTITUDE TEST FACILITY

AR – PCB AIR SAMPLE

C44 – TEST CELL #44

CR2 – COMPRESSOR ROOM SECOND FLOOR

NOTES:

1. SAMPLING LOCATIONS ARE APPROXIMATE.
2. ng/m³ – NANOGRAMS PER CUBIC METER

GE-AVIATION
CINCINNATI, OHIO
AIR TEST SUMMARY REPORT

DATA SUMMARY - PCB RESULTS
AMBIENT PCB AIR MONITORING

ARCADIS

FIGURE
1

CITY: SYRACUSE, NY DIV/GROUP: ENVCAD DB: L.POSENAUER LD:(Opt) PIC:(Opt) PM: C.AVERILL TM:(Opt) LYR:(Opt)ON=*;OFF=*REF*
V:\ENVCAD\SYRACUSE\ACT\C\B0031231\0000\00003\DWG\ATSR\31231C03.dwg LAYOUT: 1 SAVED: 7/29/2013 2:29 PM ACADVER: 18.1S (LMS TECH) PAGESETUP: C-LB-PDF-GMS PLOTSTYLETABLE: PLTFULL.CTB PLOTTED: 7/29/2013 2:30 PM BY: POSENAUER, LISA
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ENVIRONMENT

Peter Ramanauskas
U.S. EPA Region 5
77 W. Jackson Blvd
Chicago, IL 60604

Subject:
GE Aviation – Altitude Test Facility
Data Summary of Fifth Air Sampling Event – January 2014

Date:
January 29, 2014

Dear Mr. Ramanauskas:

On January 8, 2014, GE Aviation, an operating division of the General Electric Company (GE), performed air testing activities at the Altitude Test Facility (ATF) at GE's facility in Evendale, Ohio, in accordance with GE's PCB *Indoor Ambient Air Monitoring Plan During Short-Term Engine Testing Plan* (Air Monitoring Plan), submitted to EPA on January 8, 2013, and *GE Aviation Short-Term Section 761.62(c) Submission* on December 19, 2013. On January 16, 2014 EPA agreed to amend its December 19, 2013 approval, granting an extension to the Short Term Approval, permitting GE additional jet engine testing between January 1 and April 30, 2014. In accordance with this approval, GE conducted an air sample event prior to commencing jet engine testing at the ATF. On January 23, 2014, GE received the laboratory report containing the analytical results from the air samples taken on January 8, 2014.

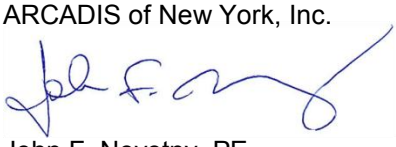
Air test sample ATF-AR-C44-03, located adjacent to the #44 Test Cell Chamber of the ATF, and air test sample ATF-AR-CR2-05, located on the second floor of the compressor room, were both taken over an 8-hour interval. The samples were collected on January 8, 2014, prior to GE resuming engine testing at the ATF in accordance with the Interim Operational Conditions agreed upon. Both air pumps were placed in a manner such that the air sample would be collected from the breathing zone. Calibration and preparation of air samples followed Method T0-10A: Compendium of Methods for Toxic Organic Air Pollution. The laboratory analytical results of the sampling event are provided in the Data Summary Table, attached as Table 1 and the sampling locations are provided on the attached Figure 1. As

indicated in the attachments, sample ATF-AR-C44-03 (collected adjacent to Test Cell #44) had non-detected (ND) PCBs, and sample ATF-AR-CR2-05 (collected from the ATF compressor room) had non-detected (ND) PCBs.

Please do not hesitate to contact John Rumpf, Counsel for Environmental Affairs at GE Aviation, at (513) 243-4256 or Christopher Bell at Greenberg Traurig LLP at (713) 374-3556 if you have any questions.

Sincerely,

ARCADIS of New York, Inc.



John F. Novotny, PE
Senior Engineer

Attachments
Table 1
Figure 1

Copies:
Susan Perdomo, GE
John Rumpf, GE
Christopher Bell, Greenberg Traurig, LLP

Table 1
Data Summary - PCB Air Monitoring - January 2014

GE - Aviation - Altitude Test Facility
Cincinnati, Ohio

Sampling ID	Date Collected	Sample Type	Total PCBs (ng/m^3)	Location Description
Event 4				
ATF-AR-C44-03	1/8/2014	Air	ND	Test Cell 44 open floor area
ATF-AR-CR2-05	1/8/2014	Air	ND	Second floor of ATF Compressor Room

Notes:

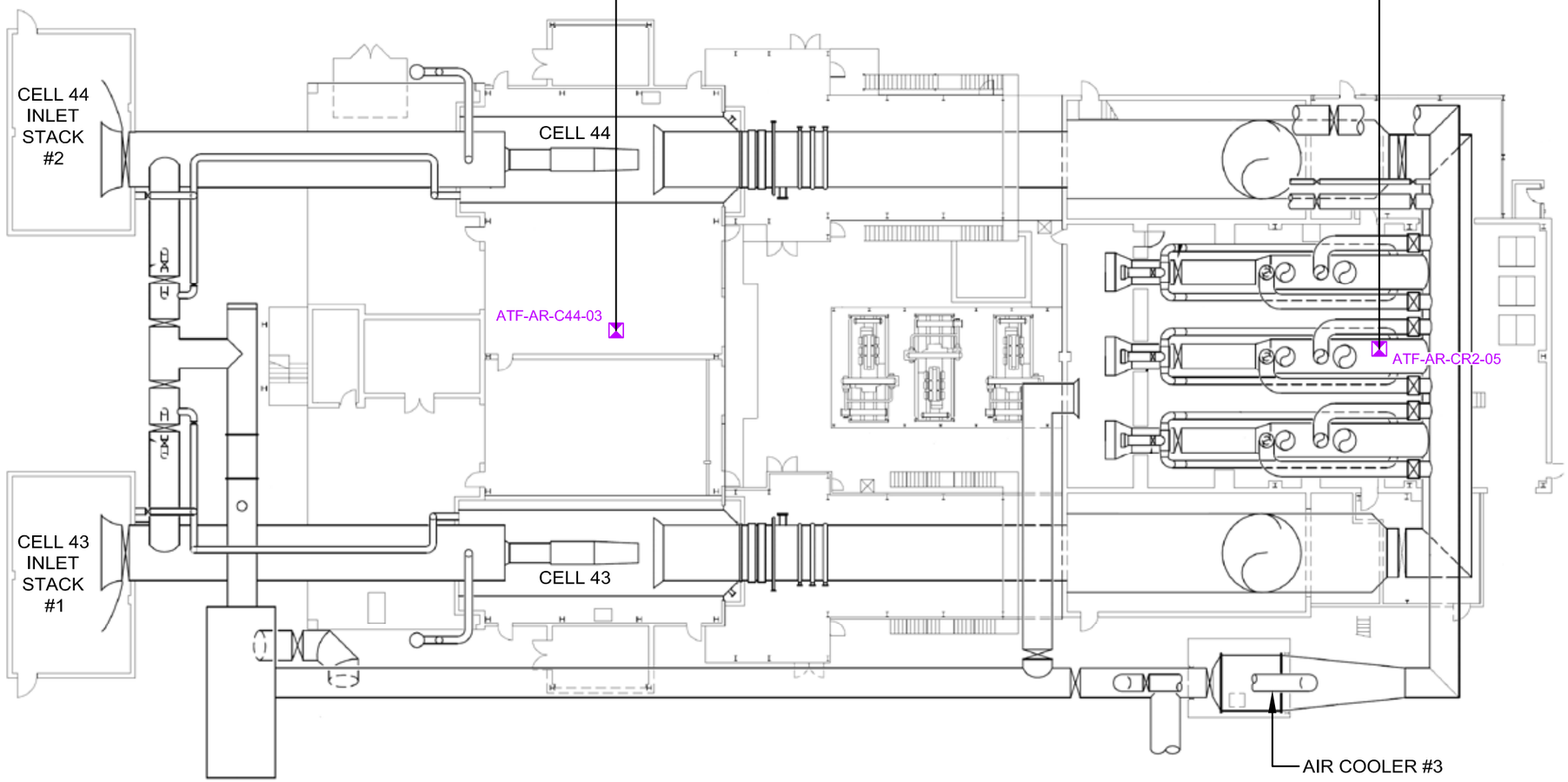
1. Samples collected by ARCADIS personnel and submitted to Pace Analytical Laboratory for analysis using USEPA Compendium Method TO-10A procedures.
2. Air pumps were set up at breathing zone height and operated over an 8-hour interval at an air intake rate of approximately 5 L/min, resulting in approximately 2,400 L of air pulled through the puff for each sample.
3. Event 5 took place at the ATF on January 8, 2014.

Abbreviations:

ATF - Altitude Test Facility
AR - PCB air sample
C44 - Test Cell #44
CR2 - compressor room-second floor
PCBs - polychlorinated biphenyls
ng/m^3 - nanograms per cubic meter

ATF–AR–C44–03	
DATE	1/8/2014
TOTAL PCBs (ng/m³)	ND

ATF–AR–CR2–05	
DATE	1/8/2014
TOTAL PCBs (ng/m³)	ND



NOT TO SCALE

LEGEND:

AMBIENT PCB AIR MONITORING LOCATION

SAMPLING NOMENCLATURE:

ATF – ALTITUDE TEST FACILITY

AR – PCB AIR SAMPLE

C44 – TEST CELL #44

CR2 – COMPRESSOR ROOM SECOND FLOOR

NOTES:

1. SAMPLING LOCATIONS ARE APPROXIMATE.
2. ng/m³ – NANOGRAMS PER CUBIC METER

GE-AVIATION
CINCINNATI, OHIO
AIR TEST SUMMARY REPORT

DATA SUMMARY - PCB RESULTS
AMBIENT PCB AIR MONITORING

ARCADIS

FIGURE
1

CITY: SYRACUSE, NY DIV/GROUP: ENVCAD DB: L.POSENAUER LD:(Opt) PIC:(Opt) PM: CAVERILL TM:(Opt) LYR:(Opt)ON=*;OFF=*REF*
V:\ENVCAD\SYRACUSE\ACTIN\B0031335\2013\00002\DWG\ATSR31335C01.dwg LAYOUT: 1 SAVED: 1/24/2014 9:36 AM ACADVER: 18.1S (LMS TECH) PAGESETUP: ---- PLOTSTYLETABLE: PLTFULL.CTB PLOTTED: 1/24/2014 9:36 AM BY: POSENAUER, LISA
XREFS: 31335X00 IMAGES: 31335X01.png

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Peter Ramanauskas
U.S. EPA Region 5
77 W. Jackson Blvd
Chicago, IL 60604

ENVIRONMENT

Subject:
GE Aviation – Altitude Test Facility
Data Summary of Sixth Air Sampling Event – February 2014

Date:
February 28, 2014

Dear Mr. Ramanauskas:

On February 18, 2014, GE Aviation, an operating division of the General Electric Company (GE), performed air testing activities at the Altitude Test Facility (ATF) at GE's facility in Evendale, Ohio, in accordance with EPA's January 16, 2014 amendment to EPA's December 19, 2012 approval allowing GE to use the ATF for jet engine testing pursuant to 40 CFR § 761.62(c). .

GE collected two air samples during active jet engine testing at the ATF on February 18, 2014, and received the laboratory report containing the results on February 25, 2014. Both samples were "non-detect" for PCBs. Details on the sampling event follow.

Air test sample ATF-AR-C44-03, located adjacent to the #44 Test Cell Chamber of the ATF, and air test sample ATF-AR-CR2-06, located on the second floor of the compressor room, were both taken over an 8-hour interval. The samples were collected on February 18, 2014, during active engine testing conducted by GE at the ATF. Both air pumps were placed in a manner such that the air sample would be collected from the breathing zone. During the eight hour sample period, there was approximately five hours of engine run time. Calibration and preparation of air samples followed Method T0-10A: Compendium of Methods for Toxic Organic Air Pollution. The laboratory analytical results of the sampling event are provided in the Data Summary Table, attached as Table 1 and the sampling locations are provided on the attached Figure 1. As indicated in the attachments, sample ATF-AR-C44-03 (collected adjacent to Test Cell #44) had non-detected (ND) PCBs, and sample ATF-

AR-CR2-06 (collected from the ATF compressor room) had non-detected (ND) PCBs.

Please do not hesitate to contact John Rumpf, Counsel for Environmental Affairs at GE Aviation, at (513) 243-4256 or Christopher Bell at Greenberg Traurig LLP at (713) 374-3556 if you have any questions.

Sincerely,

ARCADIS of New York, Inc.

John F. Novotny, PE
Senior Engineer

Attachments
Table 1
Figure 1

Copies:
Susan Perdomo, USEPA
John Rumpf, GE
Christopher Bell, Greenberg Traurig, LLP

Table 1
Data Summary - PCB Air Monitoring - February 2014

GE - Aviation - Altitude Test Facility
Cincinnati, Ohio

Sampling ID	Date Collected	Sample Type	Total PCBs (ng/m^3)	Location Description
Event 4				
ATF-AR-C44-03	2/18/2014	Air	ND	Test Cell 44 open floor area
ATF-AR-CR2-06	2/18/2014	Air	ND	Second floor of ATF Compressor Room

Notes:

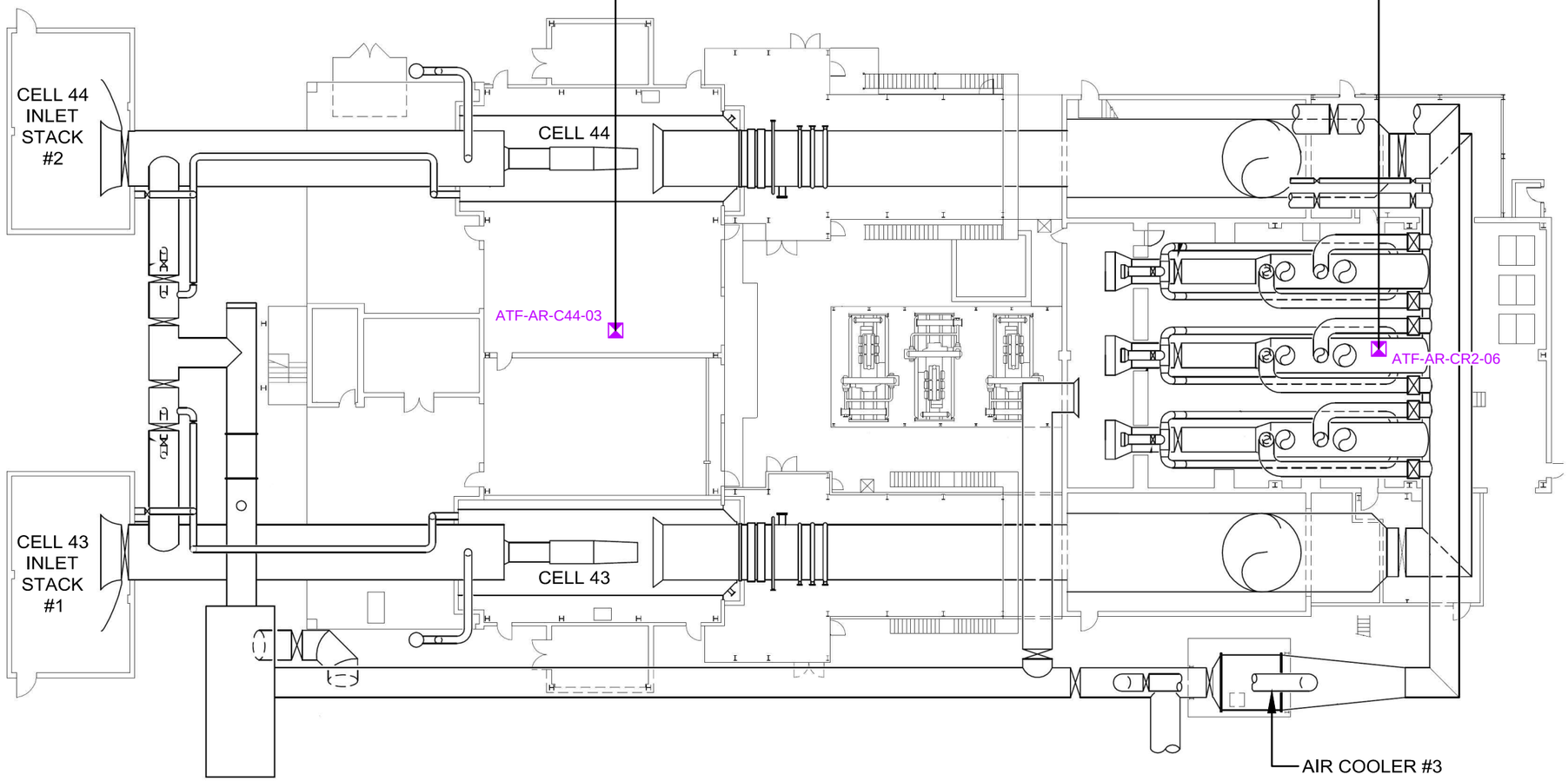
1. Samples collected by ARCADIS personnel and submitted to Pace Analytical Laboratory for analysis using USEPA Compendium Method TO-10A procedures.
2. Air pumps were set up at breathing zone height and operated over an 8-hour interval at an air intake rate of approximately 5 L/min, resulting in approximately 2,400 L of air pulled through the puff for each sample.
3. Event 5 took place at the ATF on February 18, 2014.
4. Total PCBs - The sum of aroclors 1016 through 1268.
5. ND - Non-Detect at Pratical Quantitation Limit of 0.0417 ug/m^3 per aroclor.

Abbreviations:

ATF - Altitude Test Facility
AR - PCB air sample
C44 - Test Cell #44
CR2 - compressor room-second floor
PCBs - polychlorinated biphenyls
ug/m^3 - micrograms per cubic meter

ATF-AR-C44-03	
DATE	2/18/2014
TOTAL PCBs (ug/m³)	ND

ATF-AR-CR2-06	
DATE	2/18/2014
TOTAL PCBs (ug/m³)	ND



NOT TO SCALE

LEGEND:

- ATF-AR-C44-03 — AMBIENT PCB AIR MONITORING LOCATION

SAMPLING NOMENCLATURE:

ATF – ALTITUDE TEST FACILITY

AR – PCB AIR SAMPLE

C44 – TEST CELL #44

CR2 – COMPRESSOR ROOM SECOND FLOOR

NOTES:

1. SAMPLING LOCATIONS ARE APPROXIMATE.
2. ug/m³ – NANOGRAMS PER CUBIC METER
3. TOTAL PCBs – THE SUM OF AROCLORS 1016 THROUGH 1268.

GE-AVIATION
CINCINNATI, OHIO
AIR TEST SUMMARY REPORT

DATA SUMMARY - PCB RESULTS
AMBIENT PCB AIR MONITORING

ARCADIS

FIGURE
1

CITY: SYRACUSE, NY DIV/GROUP: ENVCAD DB: L.POSENAUER LD:(Opt) PIC:(Opt) PM: C.AVERILL TM:(Opt) LYR:(Opt)ON=*;OFF=*REF*
V:\ENVCAD\SYRACUSE\ACTIN\B0031335\2013\00002\DWG\ATSR\31335C02.dwg LAYOUT: 1 SAVED: 2/26/2014 12:57 PM ACADVER: 18.1S (LMS TECH) PAGESETUP: ---- PLOTSTYLETABLE: PLTFULL.CTB PLOTTED: 2/28/2014 8:36 AM BY: POSENAUER, LISA
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Peter Ramanauskas
U.S. EPA Region 5
77 W. Jackson Blvd
Chicago, IL 60604

ENVIRONMENT

Subject:
GE Aviation – Altitude Test Facility
Data Summary of Seventh Air Sampling Event – March 2014

Date:
April 10, 2014

Dear Mr. Ramanauskas:

On March 28, 2014, GE Aviation, an operating division of the General Electric Company (GE), performed air testing activities at the Altitude Test Facility (ATF) at GE's facility in Evendale, Ohio, in accordance with EPA's January 16, 2014 amendment to EPA's December 19, 2012 approval allowing GE to use the ATF for jet engine testing pursuant to 40 CFR § 761.62(c).

GE collected two air samples during active jet engine testing at the ATF on March 28, 2014, and received the laboratory report containing the results on April 3, 2014. Both samples had low, but detectable results for PCBs: 19.4 nanograms per cubic meter (ng/m^3) and 99.5 ng/m^3, well below the NIOSH standard of 1,000 ng/m^3. Details for the sampling event follow.

Air test sample ATF-AR-C43-04, located adjacent to the #43 Test Cell Chamber of the ATF, and air test sample ATF-AR-CR2-07, located on the second floor of the compressor room, were both taken over an 8-hour interval. The samples were collected on March 28, 2014, during which there was no active engine testing. This sampling event preceded active engine testing conducted by GE at the ATF. Both air pumps were placed in a manner such that the air sample would be collected from the breathing zone. Calibration and preparation of air samples followed Method T0-10A: Compendium of Methods for Toxic Organic Air Pollution. The laboratory analytical results of the sampling event are provided in the Data Summary Table, attached as Table 1, and the sampling locations are provided on the attached Figure 1. As indicated in the attachments, sample ATF-AR-C43-04 (collected adjacent to Test Cell #43) had detected PCBs of 19.4 ng/m^3, and sample ATF-AR-CR2-07 (collected from the ATF compressor room) had detected PCBs of 99.5 ng/m^3. The practical quantitation limit for these results was 41.7 ng/m^3.

Please do not hesitate to contact John Rumpf, Counsel for Environmental Affairs at GE Aviation, at (513) 243-4256 or Christopher Bell at Greenberg Traurig LLP at (713) 374-3556 if you have any questions.

Sincerely,

ARCADIS U.S., Inc.

John F. Novotny, PE
Senior Engineer

Attachments
Table 1: Data Summary – PCB Air Monitoring – March 2014
Figure 1: Sampling Locations

Copies:
Susan Perdomo, USEPA
John Rumpf, GE
Christopher Bell, Greenberg Traurig, LLP

Table 1
Data Summary - PCB Air Monitoring - March 2014

GE - Aviation - Altitude Test Facility
Cincinnati, Ohio

Sampling ID	Date Collected	Sample Type	Total PCBs (ng/m^3)	Location Description
Event 4				
ATF-AR-C43-04	3/28/2014	Air	19.4	Test Cell 43 open floor area
ATF-AR-CR2-07	3/28/2014	Air	99.5	Second floor of ATF Compressor Room

Notes:

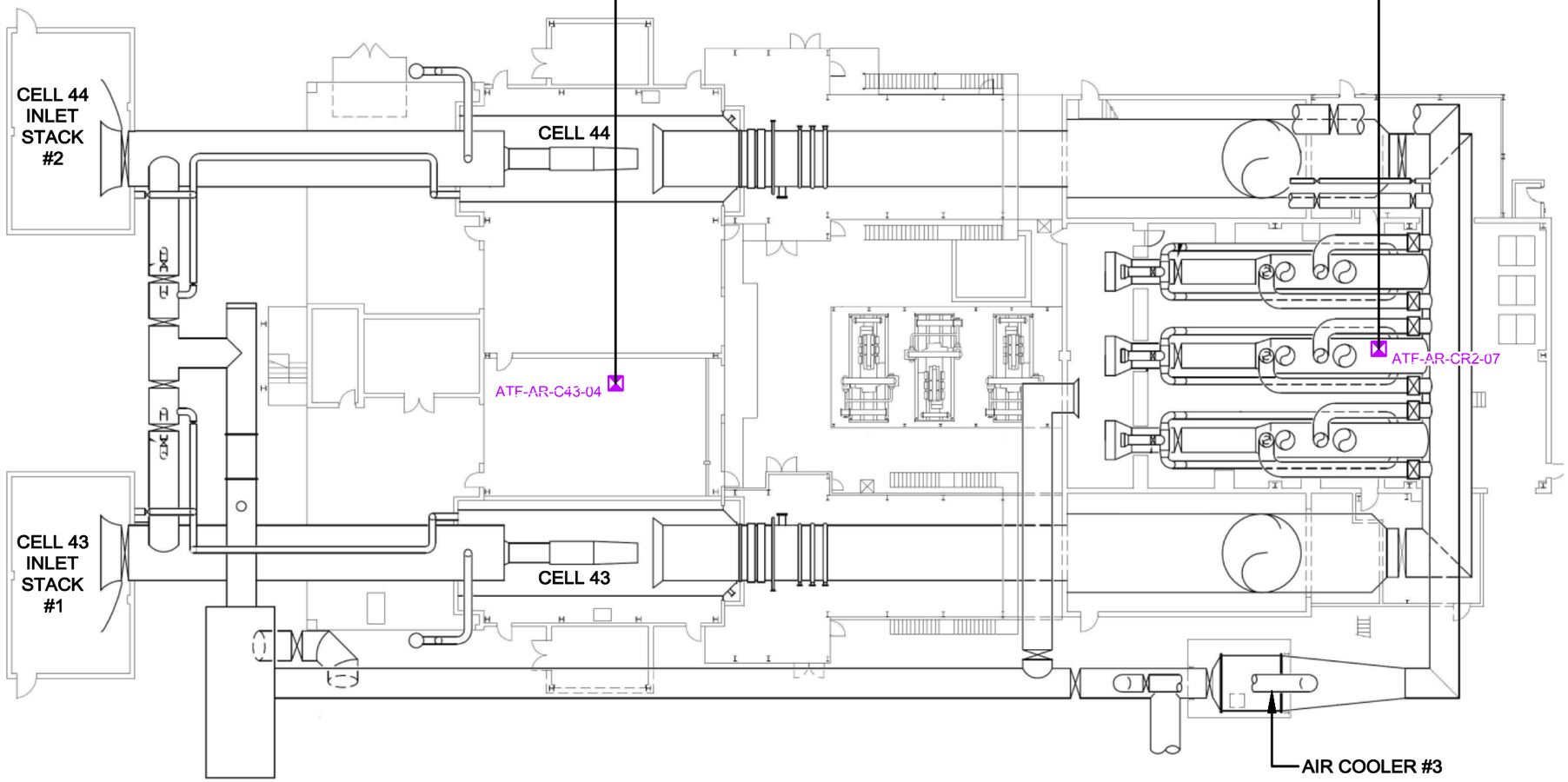
1. Samples collected by ARCADIS personnel and submitted to Pace Analytical Laboratory for analysis using USEPA Compendium Method TO-10A procedures.
2. Air pumps were set up at breathing zone height and operated over an 8-hour interval at an air intake rate of approximately 5 L/min, resulting in approximately 2,400 L of air pulled through the puff for each sample.
3. Event 7 took place at the ATF on March 28, 2014.
4. Total PCBs - The sum of aroclors 1016 through 1268.
5. Pratical Quantitation Limit of 41.7 ng/m^3 per aroclor.

Abbreviations:

ATF - Altitude Test Facility
AR - PCB air sample
C43 - Test Cell #43
CR2 - compressor room-second floor
PCBs - polychlorinated biphenyls
ng/m^3 - nanograms per cubic meter

ATF-AR-C43-04	
DATE	3/28/2014
Total PCBs (ng/m³)	19.4

ATF-AR-CR2-07	
DATE	3/28/2014
Total PCBs (ng/m3)	99.5



NOT TO SCALE

LEGEND:

- AMBIENT PCB AIR MONITORING LOCATION

SAMPLING NOMENCLATURE:

ATF – ALTITUDE TEST FACILITY

AR – PCB AIR SAMPLE

C43 – TEST CELL #43

CR2 – COMPRESSOR ROOM SECOND FLOOR

NOTES:

1. SAMPLING LOCATIONS ARE APPROXIMATE.
2. ug/m³ – NANOGRAMS PER CUBIC METER
3. TOTAL PCBs – THE SUM OF AROCLORS 1016 THROUGH 1268.

GE-AVIATION
CINCINNATI, OHIO
AIR TEST SUMMARY REPORT

DATA SUMMARY - PCB RESULTS AMBIENT PCB AIR MONITORING

ARCADIS

FIGURE
1

CITY: SYRACUSE, NY DIV/GROUP: ENVCAD DB: L.POSENAUER LD:(Opt) PIC:(Opt) PM: C.AVERILL TM:(Opt) LYR:(Opt)ON=*;OFF=*REF*
V:\ENVCAD\SYRACUSE\ACT\NB0031335\2013\RES01\ATSR\31335C03.dwg LAYOUT: 1 SAVED: 4/4/2014 8:55 AM ACADVER: 18.1S (LMS TECH) PAGESETUP: ---- PLOTSTYLETABLE: PLTFULL.CTB PLOTTED: 4/4/2014 9:05 AM BY: POSENAUER, LISA
XREFS: IMAGES:
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Peter Ramanauskas
U.S. EPA Region 5
77 W. Jackson Blvd
Chicago, IL 60604

ENVIRONMENT

Subject:
GE Aviation – Altitude Test Facility
Data Summary of Eighth Air Sampling Event – April 2014

Date:
April 22, 2014

Dear Mr. Ramanauskas:

On April 1, 2014, GE Aviation, an operating division of the General Electric Company (GE), performed indoor air testing activities at the Altitude Test Facility (ATF) at GE's facility in Evendale, Ohio, in accordance with EPA's January 16, 2014 amendment to EPA's December 19, 2012 approval allowing GE to use the ATF for jet engine testing pursuant to 40 CFR § 761.62(c).

GE collected two indoor air samples during active jet engine testing at the ATF on April 1, 2014, and received the laboratory report containing the results on April 15, 2014. One sample was "Non-Detect" for PCBs, and the second sample had low, but detectable results for PCBs: 55.0 nanograms per cubic meter (ng/m^3), well below the NIOSH standard of 1,000 ng/m^3. (Note that Non-Detect denote that analytes were not detected at concentrations greater than the laboratory practical quantitation limit - PQL.) Further details for the sampling event follow in the report and Table 1.

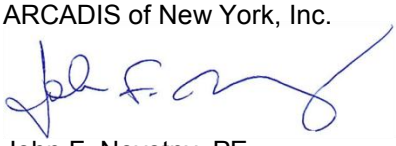
Air test sample ATF-AR-C43-05, located adjacent to the #43 Test Cell Chamber of the ATF and air test sample ATF-AR-CR2-08, located on the second floor of the compressor room, were both collected over an 8-hour interval. The samples were collected on April 1, 2014, during which there was active altitude engine testing. Both air pumps were placed in a manner such that the air sample would be collected from the breathing zone. The two air pumps used for this event were programmed for a flow rate of 5.0 L/minute for a total run time of eight hours. Calibration and preparation of air samples followed Method TO-10A: Compendium of Methods for Toxic Organic Air Pollution. During the sampling event, a total volume of 2,400 Liters

was pumped through each sample media. The laboratory analytical results of the sampling event are provided in the Data Summary Table, attached as Table 1 and the sampling locations are provided on the attached Figure 1. As indicated in the attachments, sample ATF-AR-C43-05 (collected adjacent to Test Cell #43) had "non-detect" levels of PCBs ng/m^3, and sample ATF-AR-CR2-08 (collected from the ATF compressor room) had detected PCBs of 55.0 ng/m^3. The PQL for these results was 41.7 ng/m^3 with a final extraction volume of 5.0 mL.

Please do not hesitate to contact John Rumpf, Counsel for Environmental Affairs at GE Aviation, at (513) 243-4256 or Christopher Bell at Greenberg Traurig LLP at (713) 374-3556 if you have any questions.

Sincerely,

ARCADIS of New York, Inc.



John F. Novotny, PE
Senior Engineer

Attachments
Table 1
Figure 1

Copies:
Susan Perdomo, USEPA
John Rumpf, GE
Christopher Bell, Greenberg Traurig, LLP

Table 1
Data Summary - PCB Air Monitoring - April 2014

GE - Aviation - Altitude Test Facility
Cincinnati, Ohio

Sampling ID	Date Collected	Sample Type	Total PCBs (ng/m^3)	Location Description
Event 8				
ATF-AR-C43-05	4/1/2014	Air	ND	Test Cell 43 open floor area
ATF-AR-CR2-08	4/1/2014	Air	55.0	Second floor of ATF Compressor Room

Notes:

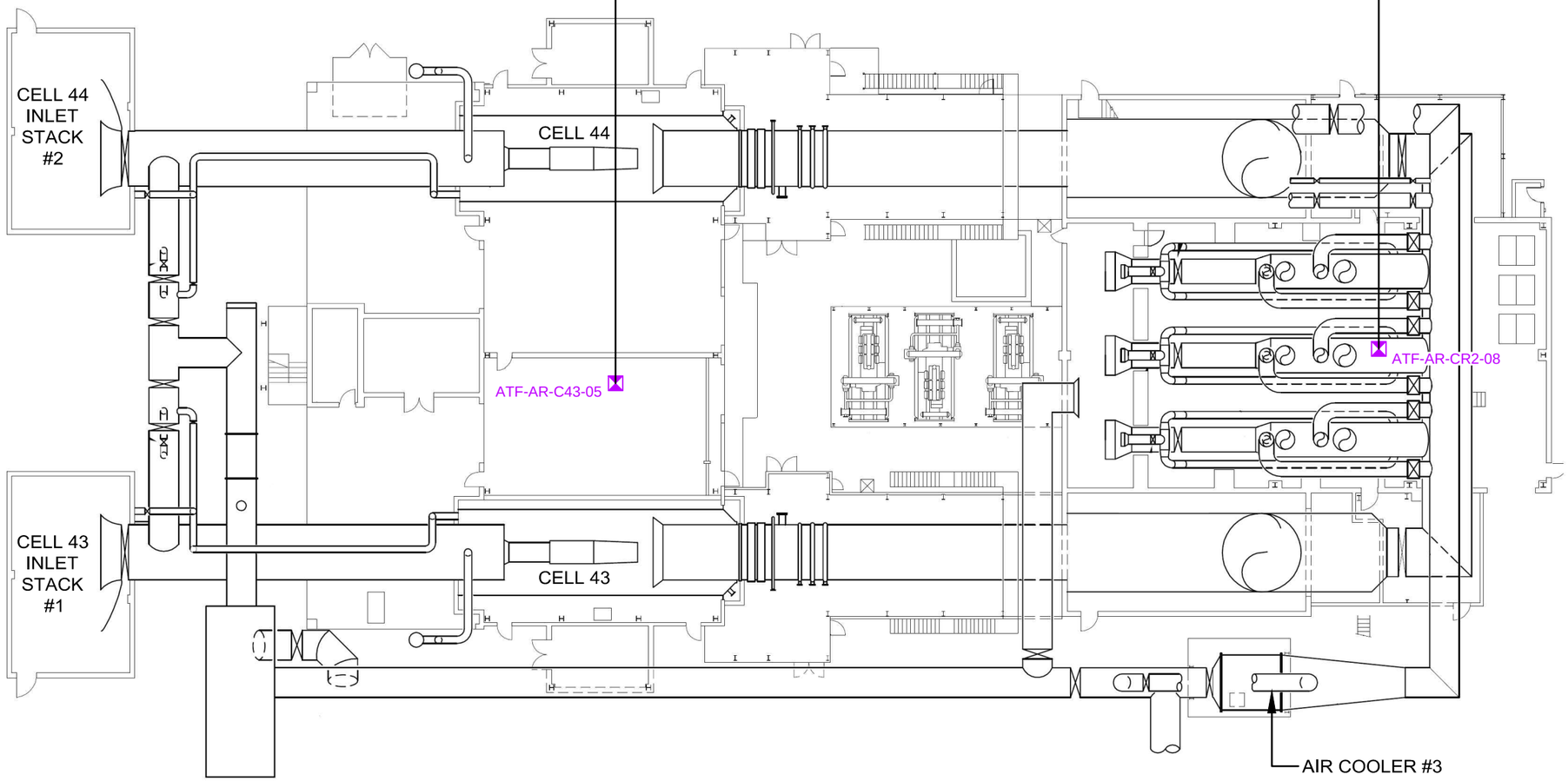
1. Samples collected by ARCADIS personnel and submitted to Pace Analytical Laboratory for analysis using USEPA Compendium Method TO-10A procedures.
2. Air pumps were set up at breathing zone height and operated over an 8-hour interval at an air intake rate of 5 L/min, resulting in 2,400 L pumped through each sample media.
3. Event 8 took place at the ATF on April 1, 2014.
4. Total PCBs - sum of aroclors 1016 through 1268.
5. The final injection volume of 5.0 mL was conducted by the laboratory.
6. ND (Non-Detect) - Denotes analyte not detected at a concentration greater than the PQL.
7. PQL (Practical Quantitation Limit) of 41.7 ng/m^3 per aroclor. Denotes lowest analyte concentration reportable for

Abbreviations:

ATF - Altitude Test Facility
AR - PCB air sample
C43 - Test Cell #43
CR2 - compressor room-second floor
PCBs - polychlorinated biphenyls
ng/m^3 - nanograms per cubic meter

ATF–AR–C43–05	
DATE	4/1/2014
TOTAL PCBs (ng/m³)	ND

ATF–AR–CR2–08	
DATE	4/1/2014
TOTAL PCBs (ng/m³)	55.0



NOT TO SCALE

LEGEND:

AMBIENT PCB AIR MONITORING LOCATION

SAMPLING NOMENCLATURE:

ATF – ALTITUDE TEST FACILITY

AR – PCB AIR SAMPLE

C43 – TEST CELL #43

CR2 – COMPRESSOR ROOM SECOND FLOOR

NOTES:

1. SAMPLING LOCATIONS ARE APPROXIMATE.
2. ng/m³ – NANOGRAMS PER CUBIC METER
3. TOTAL PCBs – THE SUM OF AROCLORS 1016 THROUGH 1268.

GE-AVIATION
CINCINNATI, OHIO
AIR TEST SUMMARY REPORT

DATA SUMMARY - PCB RESULTS
AMBIENT PCB AIR MONITORING

ARCADIS

FIGURE
1

CITY: SYRACUSE, NY DIV/GROUP: ENVCAD DB: L.POSENAUER LD:(Opt) PIC:(Opt) PM: C.AVERILL TM:(Opt) LYR:(Opt)ON=*;OFF=*REF*
V:\ENVCAD\SYRACUSE\ACTIN\B0031335\2013\RES01\ATSR\31335C04.dwg LAYOUT: 1 SAVED: 4/16/2014 9:06 AM ACADVER: 18.1S (LMS TECH) PAGESETUP: ---- PLOTSTYLETABLE: PLTFULL.CTB PLOTTED: 4/16/2014 9:06 AM BY: POSENAUER, LISA
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ENVIRONMENT

PCB Coordinator
U.S. EPA Region 5
Mailstop LU-9J
77 W. Jackson Blvd
Chicago, IL 60604

Subject:
GE Aviation – Altitude Test Facility
Data Summary of Ninth Air Sampling Event – April 2014

Date:
May 8, 2014

Dear PCB Coordinator:

On April 14, 2014, GE Aviation, an operating division of the General Electric Company (GE), performed indoor air testing activities at the Altitude Test Facility (ATF) at GE's facility in Evendale, Ohio, in accordance with EPA's January 16, 2014 amendment to EPA's December 19, 2012 approval allowing GE to use the ATF for jet engine testing pursuant to 40 CFR § 761.62(c). This report is being submitted pursuant to Consent Agreement and Final Order (TSCA-05-2014-0008) filed on April 28, 2014.

GE collected three indoor air samples at the ATF on April 14, 2014, following the conclusion of jet engine testing and received the laboratory report containing the results on April 28, 2014. Two samples were "Non-Detect" for PCBs, and the third sample had low (below the laboratory quantitation limit – PQL), but detectable results for PCBs, estimated at 32.6 nanograms per cubic meter (ng/m^3), well below the NIOSH standard of 1,000 ng/m^3. Further details for the sampling event follow in the report and **Table 1**.

Air test sample ATF-AR-C43-06, located adjacent to the #43 Test Cell Chamber of the ATF, while air test sample ATF-AR-C44-04, located adjacent to the #44 Test Cell Chamber of the ATF, and air test sample ATF-AR-CR2-09, located on the second floor of the compressor room, were all collected over an 8-hour interval. The samples were collected on April 14, 2014 during routine facility maintenance, following the completion of engine testing activities. All three air pumps were placed in a manner such that the air sample would be collected from the breathing zone, in the room where employees were performing work tasks. The three air pumps used for this event were programmed for a flow rate of 5.0 L/minute for a total run time of eight hours. Calibration and preparation of air samples followed Method TO-10A:

Compendium of Methods for Toxic Organic Air Pollution. During the sampling event, a total volume of 2,400 Liters was pumped through each sample collection media.

The laboratory analytical results of the sampling event are provided in the Data Summary Table, attached as Table 1 and the sampling locations are provided on the attached **Figure 1**. As indicated in the attachments, sample ATF-AR-C43-06 (collected adjacent to Test Cell #43) had "non-detect" levels of PCBs ng/m^3, sample ATF-AR-C44-04 (collected adjacent to Test Cell #44) had "non-detect" levels of PCBs ng/m^3, and sample ATF-AR-CR2-09 (collected from the ATF compressor room) had detected PCBs of 32.6 ng/m^3. This result is estimated (noted as "J" in the laboratory report) because the concentration is less than the PQL but greater than the method detection limit - MDL. The PQL for these results was 41.7 ng/m^3, with a final extraction volume of 5.0 mL. The specific operating parameters of the analytical instruments used by PACE Analytical during sample analysis are detailed in **Attachment 1**.

Please do not hesitate to contact John Rumpf, Counsel for Environmental Affairs at GE Aviation, at (513) 243-4256 or Christopher Bell at Greenberg Traurig LLP at (713) 374-3556 if you have any questions.

Sincerely,

ARCADIS U.S., Inc.

John F. Novotny, PE
Senior Engineer

Attachments
Table 1
Figure 1
Attachment 1

Copies:
John Rumpf, GE
Christopher Bell, Greenberg Traurig, LLP

Table 1

Table 1
Data Summary - PCB Air Monitoring - April 2014

GE - Aviation - Altitude Test Facility
Cincinnati, Ohio

Sampling ID	Date Collected	Time Collected	Sample Type	Total PCBs (ng/m^3)	Location Description
Event 9					
ATF-AR-C43-06	4/14/2014	15:20	Air	ND	Test Cell 43 open floor area
ATF-AR-C44-04	4/14/2014	15:25	Air	ND	Test Cell 44 open floor area
ATF-AR-CR2-09	4/14/2014	15:30	Air	32.6	Second Floor of ATF Compressor Room

Notes:

1. Samples collected by ARCADIS personnel and submitted to Pace Analytical Laboratory for analysis using USEPA Compendium Method TO-10A procedures.
2. Air pumps were set up at breathing zone height and operated over an 8-hour interval at an air intake rate of 5 L/min, resulting in 2,400 L pumped through each sample media.
3. Event 9 took place at the ATF on April 14, 2014.
4. Total PCBs - the sum of aroclors 1016 through 1268.
5. The final extraction volume of 5.0 mL was conducted by the laboratory.
6. The initial injection volume of 1uL was conducted by the laboratory.
7. The laboratory determined no sample breakthrough occurred on all sample media.
8. ND (Non-Detect) - Denotes analyte not detected at a concentration greater than the PQL.
9. PQL (Practical Quantitation Limit) of 41.7 ng/m^3 per aroclor. Denotes lowest analyte concentration reportable for the sample.
10. Time Collected, denotes the time which the air pumps completed the 8-hour run interval.

Abbreviations:

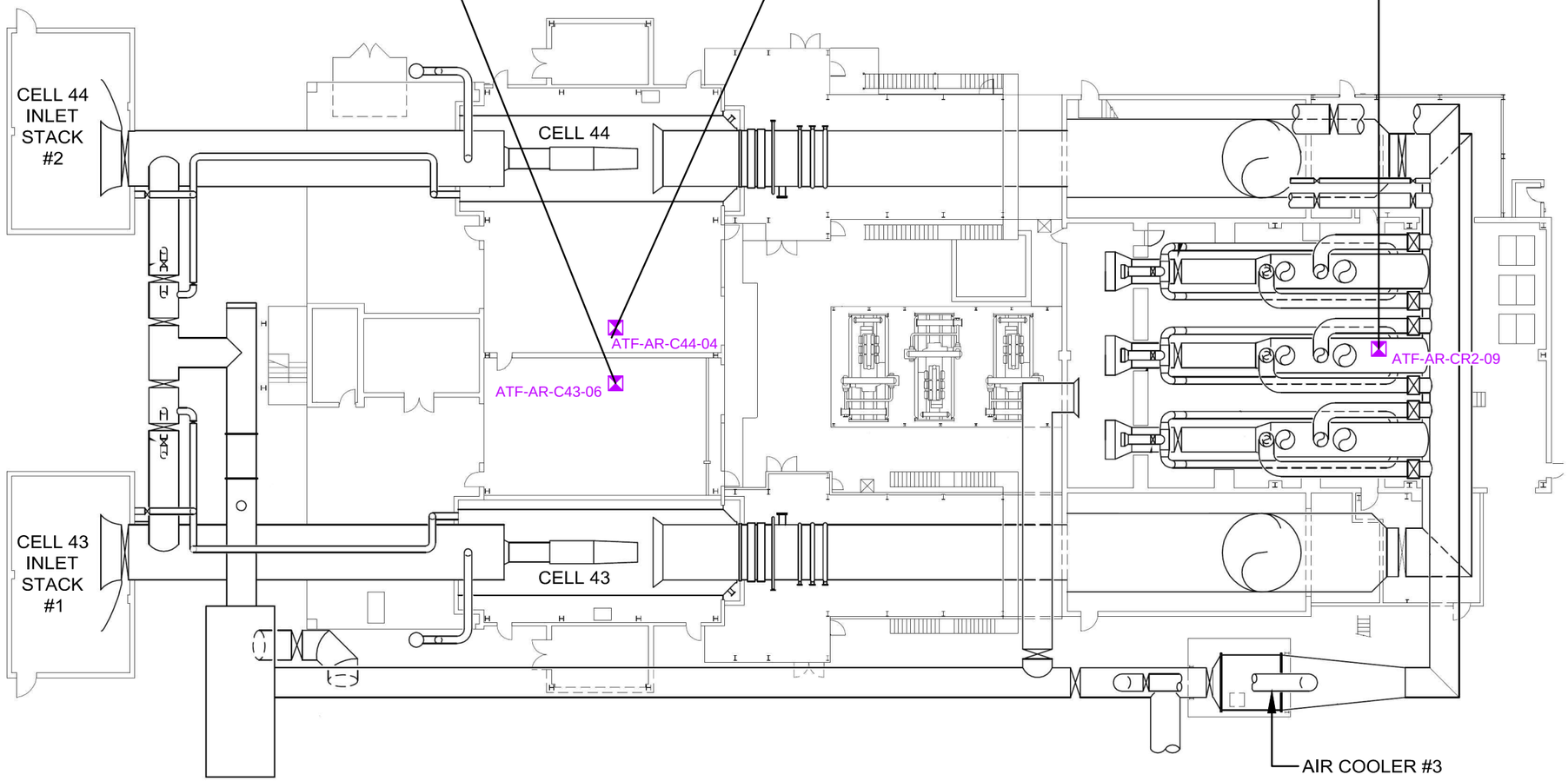
ATF - Altitude Test Facility
AR - PCB air sample
C43 - Test Cell #43
CR2 - compressor room-second floor
PCBs - polychlorinated biphenyls
ng/m^3 - nanograms per cubic meter

Figure 1

ATF–AR–C43–06	
DATE	4/14/2014
TOTAL PCBs (ng/m³)	ND

ATF–AR–C44–04	
DATE	4/14/2014
TOTAL PCBs (ng/m³)	ND

ATF–AR–CR2–09	
DATE	4/14/2014
TOTAL PCBs (ng/m³)	32.6



NOT TO SCALE

LEGEND:

- ☒ AMBIENT PCB AIR MONITORING LOCATION

SAMPLING NOMENCLATURE:

ATF – ALTITUDE TEST FACILITY

AR – PCB AIR SAMPLE

C43 – TEST CELL #43

CR2 – COMPRESSOR ROOM SECOND FLOOR

NOTES:

1. SAMPLING LOCATIONS ARE APPROXIMATE.
2. ng/m³ – NANOGRAMS PER CUBIC METER
3. TOTAL PCBs – THE SUM OF AROCLORS 1016 THROUGH 1268.

GE-AVIATION
CINCINNATI, OHIO
AIR TEST SUMMARY REPORT

DATA SUMMARY - PCB RESULTS
AMBIENT PCB AIR MONITORING

ARCADIS

FIGURE
1

CITY: SYRACUSE, NY DIV/GROUP: ENVCAD DB: L.POSENAUER LD:(Opt) PIC:(Opt) PM: C.AVERILL TM:(Opt) LYR:(Opt)ON=*;OFF=*REF*
V:\ENVCAD\SYRACUSE\ACTIN\B0031335\2013\RES01\ATSR\31335C05.dwg LAYOUT: 1 SAVED: 4/29/2014 9:06 AM ACADVER: 18.1S (LMS TECH) PAGESETUP: ---- PLOTSTYLETABLE: PLTFULL.CTB PLOTTED: 4/29/2014 9:06 AM BY: POSENAUER, LISA
XREFS: 31335X00 IMAGES: 31335X01.png

Attachment 1

GC #: **GC-20 8082 High Level Hydrogen**
Method: **Method 3**
Column: **Front ZB-1MS 20m .18 .18**
Middle ZB-5 20m .18 .18
Date: 2/15/2013
Analyst: MCA
File Name: C:\Documents and Settings\qcarnahan\Local Settings\Temporary Internet Files\Content.Outlook\4WSEMSSD\[GC20_Parameters_1.xls]8082 HL H2

Sample Delivery: SEE LEAP PARAMETERS

Column Oven:

Step	Temp (°C)	Rate (°C/min)	Hold (min)	Total (min)
Initial	150	-------	1.41	1.41
1	290	17.5	0.65	10.06

Stabilization Time (min): 0.5

Injector: Front CP-1177

1177 Oven Power: ON
1177 Temperature (°C) 300

Time	Split State	Split Ratio
Initial	ON	35

Flow/PSI(Front EFC, Type 1):

Step	Pres (psi)	Rate (psi/min)	Hold (min)	Total (min)
Initial	*24.8**	-------	10	10

Constant Flow Mode Enable: NO
Column Flow Rate (ml/min): 1.5

Injector: Middle CP-1177

1177 Oven Power: ON
1177 Temperature (°C) 300

Time	Split State	Split Ratio
Initial	ON	30

Flow/PSI(Front EFC, Type 1):

Step	Pres (psi)	Rate (psi/min)	Hold (min)	Total (min)
Initial	*29*	-------	10	10

Constant Flow Mode Enable: NO
Column Flow Rate (ml/min): 1.5

Detector: **Front ECD**

ECD Oven Power: ON
Temperature (°C) 300
Electronics: ON
Range: 1

Time	Range	Autozero
Initial	1	YES

Front ECD Adjustment
Time Constant: Fast
Cell Current: CAP
Contact Potential (mV):
Date of last adjustment

Middle ECD

ECD Oven Power: ON
Temperature (°C) 300
Electronics: ON
Range: 1

Time	Range	Autozero
Initial	1	YES

Fast
CAP

Front ECD Adjustments
Make-up Flow (mL/min) 35

Middle ECD Adjustments
35

Analog Output

Detectors: Front: ECD
Middle: ECD
Rear: None

*values may change with use

Time	Signal Source	Attenuation
Initial	Front Detector	1
Time	Signal Source	Attenuation
Initial	Middle Detector	1
Time	Signal Source	Attenuation
Initial	Rear Detector	1

r

Valve Table:

Time	1 None	2 None	3 None	4 None	5 None	6 None	7 None
Initial	-----	-----	-----	-----	-----	-----	-----

Initial valve state=Off

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New York 13214-0066
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Fax 315 449 0017
www.arcadis-us.com

ENVIRONMENT

PCB Coordinator
U.S. EPA Region 5
Mailstop LU-9J
77 W. Jackson Blvd
Chicago, IL 60604

Subject:
GE Aviation – Altitude Test Facility
Data Summary of Tenth Air Sampling Event – May 2014

Date:
June 19, 2014

Dear PCB Coordinator:

On May 21, 2014, GE Aviation, an operating division of the General Electric Company (GE), performed indoor air testing activities at the Altitude Test Facility (ATF) at GE's facility in Evendale, Ohio, in accordance with EPA's January 16, 2014 amendment to EPA's December 19, 2012 approval allowing GE to use the ATF for jet engine testing pursuant to 40 CFR § 761.62(c). This report is being submitted pursuant to Consent Agreement and Final Order (TSCA-05-2014-0008) filed on April 28, 2014.

GE collected two indoor air samples at the ATF on May 21, 2014, prior to conducting jet engine testing in June 2014 and received the laboratory report containing the results on June 9, 2014. One sample was "Non-Detect" for PCBs, and the second sample had low but detectable results for PCBs, estimated at 123.9 nanograms per cubic meter (ng/m^3), well below the NIOSH standard of 1,000 ng/m^3. Further details for the sampling event follow in the report and **Table 1**.

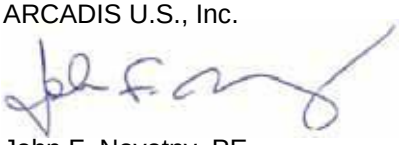
Air test sample ATF-AR-C44-05, located adjacent to the #44 Test Cell Chamber of the ATF, and air test sample ATF-AR-CR2-10, located on the second floor of the compressor room, were both collected over an 8-hour interval. The samples were collected on May 21, 2014, during routine facility maintenance, prior to conducting jet engine testing activities. Both air pumps were placed in a manner such that the air sample would be collected from the breathing zone, in the room where employees were performing work tasks. Both air pumps used for this event were programmed for a flow rate of 5.0 L/minute for a total run time of eight hours. Calibration and preparation of air samples followed Method TO-10A: Compendium of Methods for Toxic Organic Air Pollution. During the sampling event, a total volume of 2,400 Liters was pumped through each sample collection media.

The laboratory analytical results of the sampling event are provided in the Data Summary Table, attached as **Table 1** and the sampling locations are provided on the attached **Figure 1**. As indicated in the attachments, sample ATF-AR-C44-05 (collected adjacent to Test Cell #44) had "non-detect" levels of PCBs ng/m^3, and sample ATF-AR-CR2-10 (collected from the ATF compressor room) had detected PCBs of 123.9 ng/m^3. The laboratory quantitation limit (PQL) for these results was 41.7 ng/m^3, with a final extraction volume of 5.0 mL. The specific operating parameters of the analytical instruments used by PACE Analytical during sample analysis are detailed in **Attachment 1**.

Please do not hesitate to contact John Rumpf, Counsel for Environmental Affairs at GE Aviation, at (513) 243-4256 or Christopher Bell at Greenberg Traurig LLP at (713) 374-3556 if you have any questions.

Sincerely,

ARCADIS U.S., Inc.



John F. Novotny, PE
Senior Engineer

Attachments
Table 1
Figure 1
Attachment 1

Copies:
John Rumpf, GE
Christopher Bell, Greenberg Traurig, LLP

Table 1

Table 1
Data Summary - PCB Air Monitoring - May 2014

GE - Aviation - Altitude Test Facility
Cincinnati, Ohio

Sampling ID	Date Collected	Time Collected	Sample Type	Total PCBs (ng/m^3)	Location Description
Event 10					
ATF-AR-C44-05	5/21/2014	16:05	Air	ND	Test Cell 44 open floor area
ATF-AR-CR2-10	5/24/2014	16:05	Air	123.9	Second floor of ATF Compressor Room

Notes:

1. Samples collected by ARCADIS personnel and submitted to Pace Analytical Laboratory for analysis using USEPA Compendium Method TO-10A procedures.
2. Air pumps were set up at breathing zone height and operated over an 8-hour interval at an air intake rate of approximately 5 L/min, resulting in approximately 2,400 L of air pulled through the puff for each sample.
3. Event 10 took place at the ATF on May 21, 2014 prior to the conducting engine testing in June 2014.
4. Total PCBs - the sum of aroclors 1016 through 1268
5. The final extraction volume of 5.0 mL was conducted by the laboratory.
6. The initial injection volume of 1µL was conducted by the laboratory.
7. the Laboratory determined no sample breakthrough occurred on all sample media.
8. ND (Non-Detect) - Denotes analyte not detected at a concentration greater than the PQL
9. PQL (Practical Quantitation Limit) of 41.7 ng/m^3 per aroclor. Denotes lowest analyte concentration reportable for the sample.
10. Time Collected, denotes the time which the air pumps completed the 8-hour run interval.

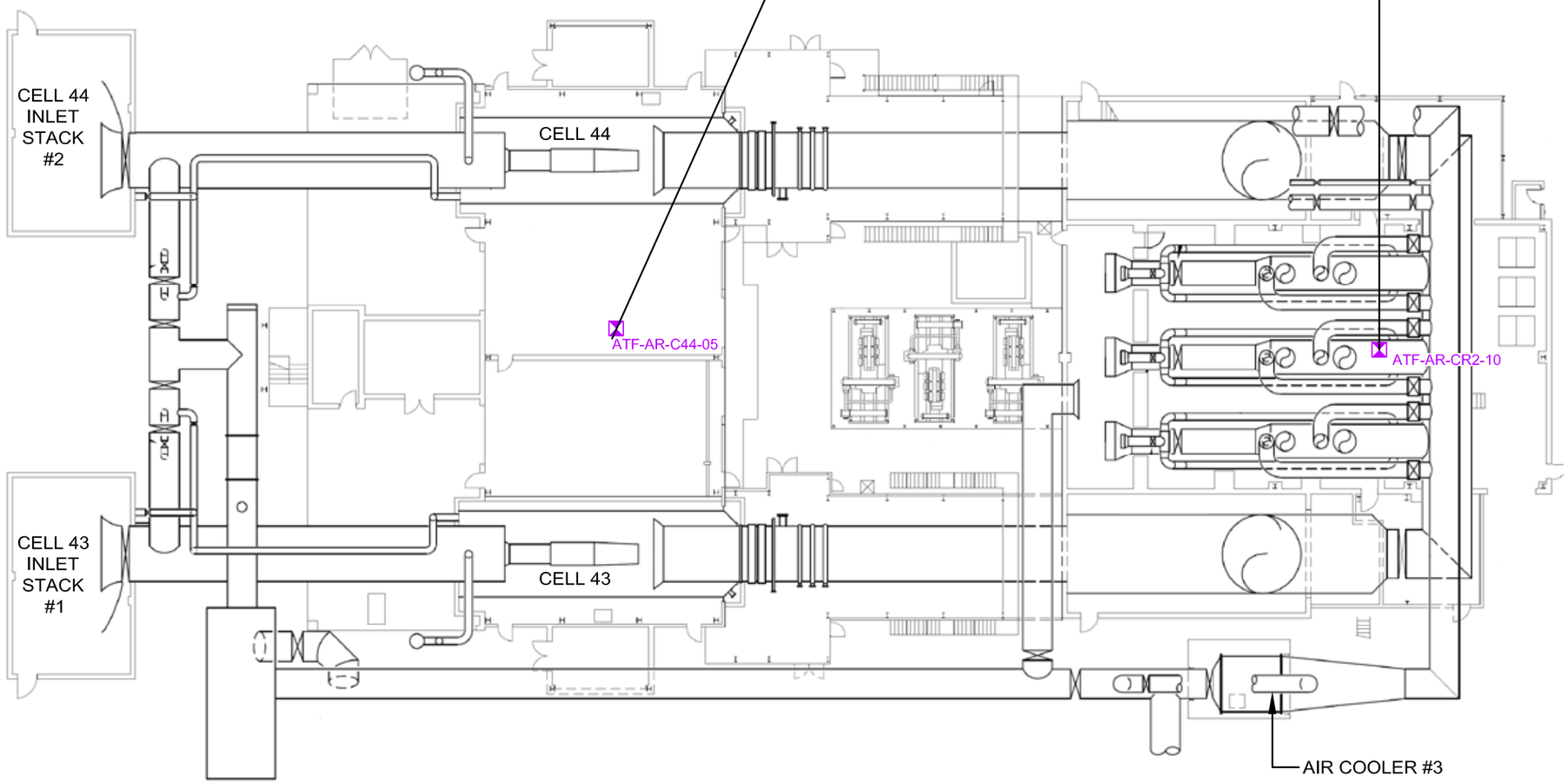
Abbreviations:

ATF - Altitude Test Facility
AR - PCB air sample
C44 - Test Cell #44
CR2 - compressor room-second floor
PCBs - polychlorinated biphenyls
ng/m^3 - nanograms per cubic meter

Figure 1

ATF–AR–C44–05	
DATE	5/21/2014
TOTAL PCBs (ng/m³)	ND

ATF–AR–CR2–10	
DATE	5/21/2014
TOTAL PCBs (ng/m³)	123.9



NOT TO SCALE

LEGEND:

AMBIENT PCB AIR MONITORING LOCATION

SAMPLING NOMENCLATURE:

ATF – ALTITUDE TEST FACILITY

AR – PCB AIR SAMPLE

C44 – TEST CELL #44

CR2 – COMPRESSOR ROOM SECOND FLOOR

NOTES:

1. SAMPLING LOCATIONS ARE APPROXIMATE.
2. ng/m³ – NANOGRAMS PER CUBIC METER
3. TOTAL PCBs – THE SUM OF AROCLORS 1016 THROUGH 1268.

GE-AVIATION
CINCINNATI, OHIO
AIR TEST SUMMARY REPORT

DATA SUMMARY - PCB RESULTS
AMBIENT PCB AIR MONITORING

ARCADIS

FIGURE
1

CITY: SYRACUSE, NY DIV/GROUP: ENVCAD DB: L.POSENAUER LD:(Opt) PIC:(Opt) PM: C.AVERILL TM:(Opt) LYR:(Opt)ON=*;OFF=*REF*
V:\ENVCAD\SYRACUSE\ACTIN\B0031335\2013\RES01\ATSR\31335C06.dwg LAYOUT: 1 SAVED: 6/11/2014 9:42 AM ACADVER: 18.1S (LMS TECH) PAGESETUP: ---- PLOTSTYLETABLE: PLTFULL.CTB PLOTTED: 6/11/2014 9:43 AM BY: POSENAUER, LISA
XREFS: 31335X00 IMAGES: 31335X01.png

Attachment 1

GC #: **GC-21 8082 High Level Method HYDROGEN**
Method: **Method 3**
Column: **GC21F ZB-1MS 20M 0.18mm 0.18um**
GC21B ZB-5 20M 0.18mm 0.18um
Date: 2/15/2013
Analyst: JKA
File Name: S:\Lims Data\1405\14050585\EDD\[GC21_Parameters_1.xls]8082 H2 HL

Sample Delivery: SEE LEAP PARAMETERS

Column Oven:

Step	Temp (°C)	Rate (°C/min)	Hold (min)	Total (min)
Initial	150	-------	1.41	1.41
1	290	17.5	0.65	10.06

Stabilization Time (min): 0.50

Injector: Front CP-1177

1177 Oven Power: ON
1177 Temperature (°C) 300

Time	Split State	Split Ratio
Initial	ON	35

Flow/PSI(Front EFC, Type 1):
Carrier Gas : Helium

Step	Pres (psi)	Rate (psi/min)	Hold (min)	Total (min)
Initial	*	-------	10	10

Constant Flow Mode Enable: NO
Column Flow Rate (ml/min): 2.3

Injector: Middle CP-1177

1177 Oven Power: ON
1177 Temperature (°C) 300

Time	Split State	Split Ratio
Initial	ON	35

Flow/PSI(Front EFC, Type 1):

Step	Pres (psi)	Rate (psi/min)	Hold (min)	Total (min)
Initial	*	-------	10	10

Constant Flow Mode Enable: NO
Column Flow Rate (ml/min): 2.6

Detector: **Front ECD** **Middle ECD**

5

ECD Oven Power: ON
Temperature (°C) 300
Electronics: ON
Range: 1

Time	Range	Autozero
Initial	1	YES

ECD Oven Power: ON
Temperature (°C) 300
Electronics: ON
Range: 1

Time	Range	Autozero
Initial	1	YES

Front ECD Adjustment

Time Constant:	Fast	Fast
Cell Current:	CAP	CAP
Contact Potential (mV):	*	*

*values may change with use

Front ECD Adjustments
Make-up Flow (mL/min) 30

Middle ECD Adjustments
Make-up Flow (mL/min) 35

5

Analog Output

Detectors: Front: ECD Attenuation 1
Middle: ECl Attenuation 1
Rear: None

Time	Signal Source	Attenuation
Initial	Front Detector	1
Time	Signal Source	Attenuation
Initial	Middle Detector	1
Time	Signal Source	Attenuation
Initial	Rear Detector	1

Valve Table:

Time	1 None	2 None	3 None	4 None	5 None	6 None	7 None
Initial	-----	-----	-----	-----	-----	-----	-----

Initial valve state=Off

5

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ENVIRONMENT

PCB Coordinator
U.S. EPA Region 5
Mailstop LU-9J
77 W. Jackson Blvd
Chicago, IL 60604

Subject:
GE Aviation – Altitude Test Facility
Data Summary of Eleventh Air Sampling Event – July 2014

Date:
July 29, 2014

Dear PCB Coordinator:

On July 2, 2014, GE Aviation, an operating division of the General Electric Company (GE), performed indoor air testing activities at the Altitude Test Facility (ATF) at GE's facility in Evendale, Ohio, in accordance with EPA's January 16, 2014 amendment to EPA's December 19, 2012 approval allowing GE to use the ATF for jet engine testing pursuant to 40 CFR § 761.62(c). This report is being submitted pursuant to Consent Agreement and Final Order (TSCA-05-2014-0008) filed on April 28, 2014.

GE collected two indoor air samples at the ATF on July 2, 2014, while conducting jet engine testing on July 2, 2014 and received the laboratory report containing the results on July 21, 2014. One sample was "Non-Detect" for PCBs, and the second sample had low (below the laboratory's practical quantitation limit [PQL], but above the method detection limit [MDL]) but detectable results for PCBs, estimated at 26.8 nanograms per cubic meter (ng/m^3), well below the NIOSH standard of 1,000 ng/m^3. Further details for the sampling event follow in the report and **Table 1**.

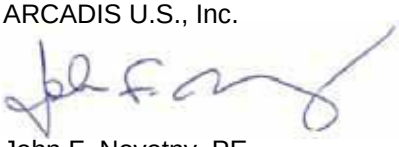
Air test sample ATF-AR-C44-06, located adjacent to the #44 Test Cell Chamber of the ATF, and air test sample ATF-AR-CR2-11, located on the second floor of the compressor room, were both collected over an 8-hour interval. The samples were collected on July 2, 2014, during routine jet engine testing activities. Both air pumps were placed in a manner such that the air sample would be collected from the breathing zone, in the room where equipment was in operation during engine tests. Both air pumps used for this event were programmed for a flow rate of 5.0 L/minute for a total run time of eight hours. Calibration and preparation of air samples followed Method TO-10A: Compendium of Methods for Toxic Organic Air Pollution. During the sampling event, a total volume of 2,400 Liters was pumped through each sample collection media.

The laboratory analytical results of the sampling event are provided in the Data Summary Table, attached as **Table 1** and the sampling locations are provided on the attached **Figure 1**. As indicated in the attachments, sample ATF-AR-CR2-11 (collected from the second floor ATF compressor room) had "non-detect" levels of PCBs ng/m^3, and sample ATF-AR-C44-06 (collected adjacent to Test Cell #44) had an estimated level of PCBs of 26.8 ng/m^3. This result is estimated (noted with a "J" in the report) because it is less than the PQL but greater than the MDL. The laboratory quantitation limit (PQL) for these results was 41.7 ng/m^3, with a final extraction volume of 5.0 mL. The specific operating parameters of the analytical instruments used by PACE Analytical during sample analysis are detailed in **Attachment 1**.

Please do not hesitate to contact John Rumpf, Counsel for Environmental Affairs at GE Aviation, at (513) 243-4256 or Christopher Bell at Greenberg Traurig LLP at (713) 374-3556 if you have any questions.

Sincerely,

ARCADIS U.S., Inc.



John F. Novotny, PE
Senior Engineer

Attachments
Table 1
Figure 1
Attachment 1

Copies:
John Rumpf, GE
Christopher Bell, Greenberg Traurig, LLP

Table 1

Table 1
Data Summary - PCB Air Monitoring - July 2014

GE - Aviation - Altitude Test Facility
Cincinnati, Ohio

Sampling ID	Date Collected	Time Collected	Sample Type	Total PCBs (ng/m^3)	Location Description
Event 11					
ATF-AR-C44-06	7/2/2014	17:10	Air	26.8 J	Test Cell 44 open floor area
ATF-AR-CR2-11	7/2/2014	17:15	Air	ND	Second floor of ATF Compressor Room

Notes:

1. Samples collected by ARCADIS personnel and submitted to Pace Analytical Laboratory for analysis using USEPA Compendium Method TO-10A procedures.
2. Air pumps were set up at breathing zone height and operated over an 8-hour interval at an air intake rate of approximately 5 L/min, resulting in approximately 2,400 L of air pulled through the puff for each sample.
3. Event 11 took place at the ATF on July 2, 2014 conducting during the engine testing in July 2014.
4. Total PCBs - the sum of aroclors 1016 through 1268
5. The final extraction volume of 5.0 mL was conducted by the laboratory.
6. The initial injection volume of 1µL was conducted by the laboratory.
7. the Laboratory determined no sample breakthrough occurred on all sample media.
8. ND (Non-Detect) - Denotes analyte not detected at a concentration greater than the PQL
9. PQL (Practical Quantitation Limit) of 41.7 ng/m^3 per aroclor. Denotes lowest analyte concentration reportable for the sample.
10. Time Collected, denotes the time which the air pumps completed the 8-hour run interval.
11. J - Denotes an estimated concentration. The concentration result is greater than or equal to the Method Detection Limit (MDL) but less than the PQL.

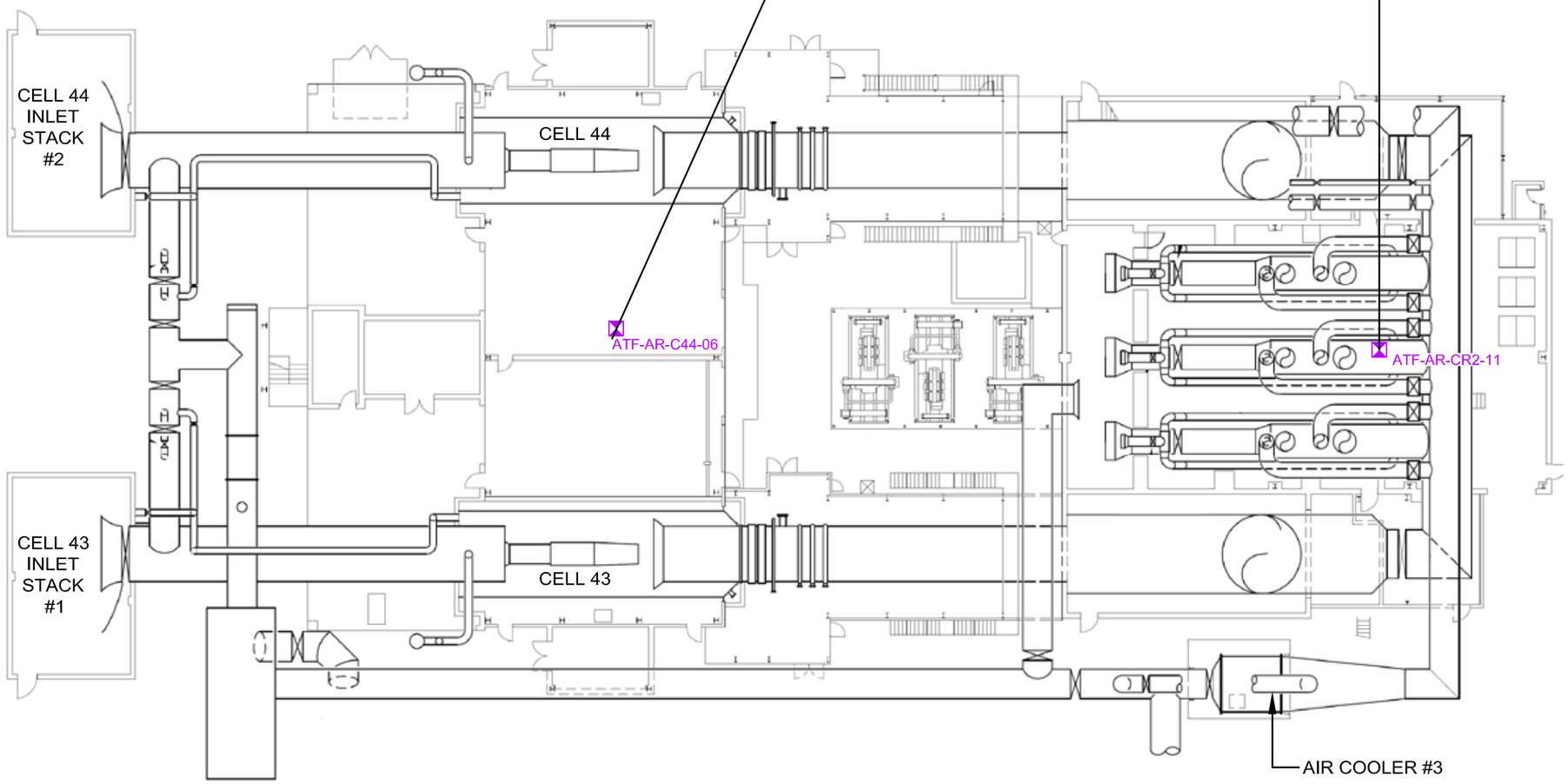
Abbreviations:

ATF - Altitude Test Facility
AR - PCB air sample
C44 - Test Cell #44
CR2 - compressor room-second floor
PCBs - polychlorinated biphenyls
ng/m^3 - nanograms per cubic meter

Figure 1

ATF–AR–C44–06	
DATE	7/2/2014
TOTAL PCBs (ng/m³)	26.8 J

ATF–AR–CR2–11	
DATE	7/2/2014
TOTAL PCBs (ng/m³)	ND



NOT TO SCALE

LEGEND:

AMBIENT PCB AIR MONITORING LOCATION

SAMPLING NOMENCLATURE:

ATF – ALTITUDE TEST FACILITY

AR – PCB AIR SAMPLE

C44 – TEST CELL #44

CR2 – COMPRESSOR ROOM SECOND FLOOR

NOTES:

1. SAMPLING LOCATIONS ARE APPROXIMATE.
2. ng/m³ – NANOGRAMS PER CUBIC METER
3. TOTAL PCBs – THE SUM OF AROCLORS 1016 THROUGH 1268.
4. J – DENOTES AN ESTIMATED CONCENTRATION. THE CONCENTRATION RESULT IS GREATER THAN OR EQUAL TO THE METHOD DETECTION LIMIT (MDL) BUT LESS THAN THE PQL.

GE-AVIATION
CINCINNATI, OHIO
AIR TEST SUMMARY REPORT

DATA SUMMARY - PCB RESULTS
AMBIENT PCB AIR MONITORING

ARCADIS

FIGURE
1

CITY: SYRACUSE, NY DIV/GROUP: ENVCAD DB: L.POSENAUER LD:(Opt) PIC:(Opt) PM: C.AVERILL TM:(Opt) LYR:(Opt)ON=*;OFF=*REF*
V:\ENVCAD\SYRACUSE\ACTIN\B0031335\2013\RES01\ATSR\31335C07.dwg LAYOUT: 1 SAVED: 7/21/2014 2:56 PM ACADVER: 18.1S (LMS TECH) PAGESETUP: ---- PLOTSTYLETABLE: PLTFULL.CTB PLOTTED: 7/29/2014 2:43 PM BY: POSENAUER, LISA
XREFS: 31335X00 IMAGES: 31335X01.png

Attachment 1

GC #: **GC-20 8082 High Level Hydrogen**
Method: **Method 3**
Column: **GC20F ZB-1MS 20M 0.18mm 0.18um**
GC20B ZB-5 20M 0.18mm 0.18um
Date: 7/9/2014
Analyst: JKA
File Name: C:\Users\KELLYH~1.NOR\AppData\Local\Temp\XPgrpwise\[GC20_Parameters_1_1.xls]8082 HL H2

Sample Delivery: SEE LEAP PARAMETERS

Column Oven:

Step	Temp (°C)	Rate (°C/min)	Hold (min)	Total (min)
Initial	150	-------	1.41	1.41
1	290	17.5	0.65	10.06

Stabilization Time (min): 0.5

Injector: Front CP-1177

1177 Oven Power: ON
1177 Temperature (°C) 300

Time	Split State	Split Ratio
Initial	ON	35

Flow/PSI(Front_EFC, Type 1):

Step	Pres (psi)	Rate (psi/min)	Hold (min)	Total (min)
Initial	*	-------	10	10

Constant Flow Mode Enable: NO
Column Flow Rate (ml/min): 1.5

Injector: Middle CP-1177

1177 Oven Power: ON
1177 Temperature (°C) 300

Time	Split State	Split Ratio
Initial	ON	30

Flow/PSI(Front_EFC, Type 1):

Step	Pres (psi)	Rate (psi/min)	Hold (min)	Total (min)
Initial	*	-------	10	10

Constant Flow Mode Enable: NO
Column Flow Rate (ml/min): 1.5

Detector: **Front ECD**

ECD Oven Power: ON
Temperature (°C) 300
Electronics: ON
Range: 1

Time	Range	Autozero
Initial	1	YES

ECD Adjustment
Time Constant: Fast
Cell Current: CAP
Contact Potential (mV): *

Middle ECD

ECD Oven Power: ON
Temperature (°C) 300
Electronics: ON
Range: 1

Time	Range	Autozero
Initial	1	YES

Fast
CAP
*

Front ECD Adjustments
Make-up Flow (mL/min) 35

Middle ECD Adjustments
35

Analog Output

Detectors: Front: ECD
Middle: ECD
Rear: None

*values may change with use

Time	Signal Source	Attenuation
Initial	Front Detector	1
Time	Signal Source	Attenuation
Initial	Middle Detector	1
Time	Signal Source	Attenuation
Initial	Rear Detector	1

Valve Table:

Time	1 None	2 None	3 None	4 None	5 None	6 None	7 None
Initial	-----	-----	-----	-----	-----	-----	-----

Initial valve state=Off

6

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New York 13214-0066
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Fax 315 449 0017
www.arcadis-us.com

ENVIRONMENT

PCB Coordinator
U.S. EPA Region 5
Mailstop LU-9J
77 W. Jackson Blvd
Chicago, IL 60604

Subject:
GE Aviation – Altitude Test Facility
Data Summary of Eleventh Air Sampling Event – July 2014

Date:
July 31, 2014

Dear PCB Coordinator:

On July 2, 2014, GE Aviation, an operating division of the General Electric Company (GE), performed indoor air testing activities at the Altitude Test Facility (ATF) at GE's facility in Evendale, Ohio, in accordance with EPA's January 16, 2014 amendment to EPA's December 19, 2012 approval allowing GE to use the ATF for jet engine testing pursuant to 40 CFR § 761.62(c). This report is being submitted pursuant to Consent Agreement and Final Order (TSCA-05-2014-0008) filed on April 28, 2014.

GE collected two indoor air samples at the ATF on July 2, 2014, while conducting jet engine testing on July 2, 2014 and received the laboratory report containing the results on July 21, 2014. One sample was "Non-Detect" for PCBs, and the second sample had low but detectable results for PCBs, estimated at 26.8 nanograms per cubic meter (ng/m^3), well below the NIOSH standard of 1,000 ng/m^3. (Note that Non-Detect denote that analytes were not detected at concentrations greater than the laboratory practical quantitation limit - PQL.) Further details for the sampling event follow in the report and **Table 1**.

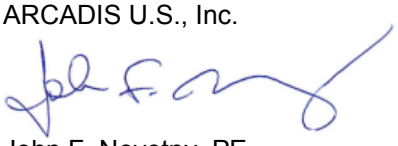
Air test sample ATF-AR-C44-06, located adjacent to the #44 Test Cell Chamber of the ATF, and air test sample ATF-AR-CR2-11, located on the second floor of the compressor room, were both collected over an 8-hour interval. The samples were collected on July 2, 2014, during routine jet engine testing activities. Both air pumps were placed in a manner such that the air sample would be collected from the breathing zone, in the room where equipment was in operation during engine tests. Both air pumps used for this event were programmed for a flow rate of 5.0 L/minute for a total run time of eight hours. Calibration and preparation of air samples followed Method TO-10A: Compendium of Methods for Toxic Organic Air Pollution. During the sampling event, a total volume of 2,400 Liters was pumped through each sample collection media.

The laboratory analytical results of the sampling event are provided in the Data Summary Table, attached as **Table 1** and the sampling locations are provided on the attached **Figure 1**. As indicated in the attachments, sample ATF-AR-C44-06 (collected adjacent to Test Cell #44) had an estimated level of PCBs of 26.8 ng/m^3, and sample ATF-AR-CR2-11 (collected from the second floor ATF compressor room) had "non-detect" levels of PCBs ng/m^3. The laboratory quantitation limit (PQL) for these results was 41.7 ng/m^3, with a final extraction volume of 5.0 mL. The specific operating parameters of the analytical instruments used by PACE Analytical during sample analysis are detailed in **Attachment 1**.

Please do not hesitate to contact John Rumpf, Counsel for Environmental Affairs at GE Aviation, at (513) 243-4256 or Christopher Bell at Greenberg Traurig LLP at (713) 374-3556 if you have any questions.

Sincerely,

ARCADIS U.S., Inc.



John F. Novotny, PE
Senior Engineer

Attachments
Table 1
Figure 1
Attachment 1

Copies:
John Rumpf, GE
Christopher Bell, Greenberg Traurig, LLP

Table 1

Table 1
Data Summary - PCB Air Monitoring - July 2014

GE - Aviation - Altitude Test Facility
Cincinnati, Ohio

Sampling ID	Date Collected	Time Collected	Sample Type	Total PCBs (ng/m^3)	Location Description
Event 11					
ATF-AR-C44-06	7/2/2014	17:10	Air	26.8 J	Test Cell 44 open floor area
ATF-AR-CR2-11	7/2/2014	17:15	Air	ND	Second floor of ATF Compressor Room

Notes:

1. Samples collected by ARCADIS personnel and submitted to Pace Analytical Laboratory for analysis using USEPA Compendium Method TO-10A procedures.
2. Air pumps were set up at breathing zone height and operated over an 8-hour interval at an air intake rate of approximately 5 L/min, resulting in approximately 2,400 L of air pulled through the puff for each sample.
3. Event 11 took place at the ATF on July 2, 2014 conducting during the engine testing in July 2014.
4. Total PCBs - the sum of aroclors 1016 through 1268
5. The final extraction volume of 5.0 mL was conducted by the laboratory.
6. The initial injection volume of 1µL was conducted by the laboratory.
7. the Laboratory determined no sample breakthrough occurred on all sample media.
8. ND (Non-Detect) - Denotes analyte not detected at a concentration above the MDL
9. PQL (Practical Quantitation Limit) of 41.7 ng/m^3 per aroclor. Denotes lowest analyte concentration reportable for the sample.
10. Time Collected, denotes the time which the air pumps completed the 8-hour run interval.
11. J - Denotes an estimated concentration. The concentration result is greater than or equal to the Method Detection Limit (MDL) but less than the PQL.

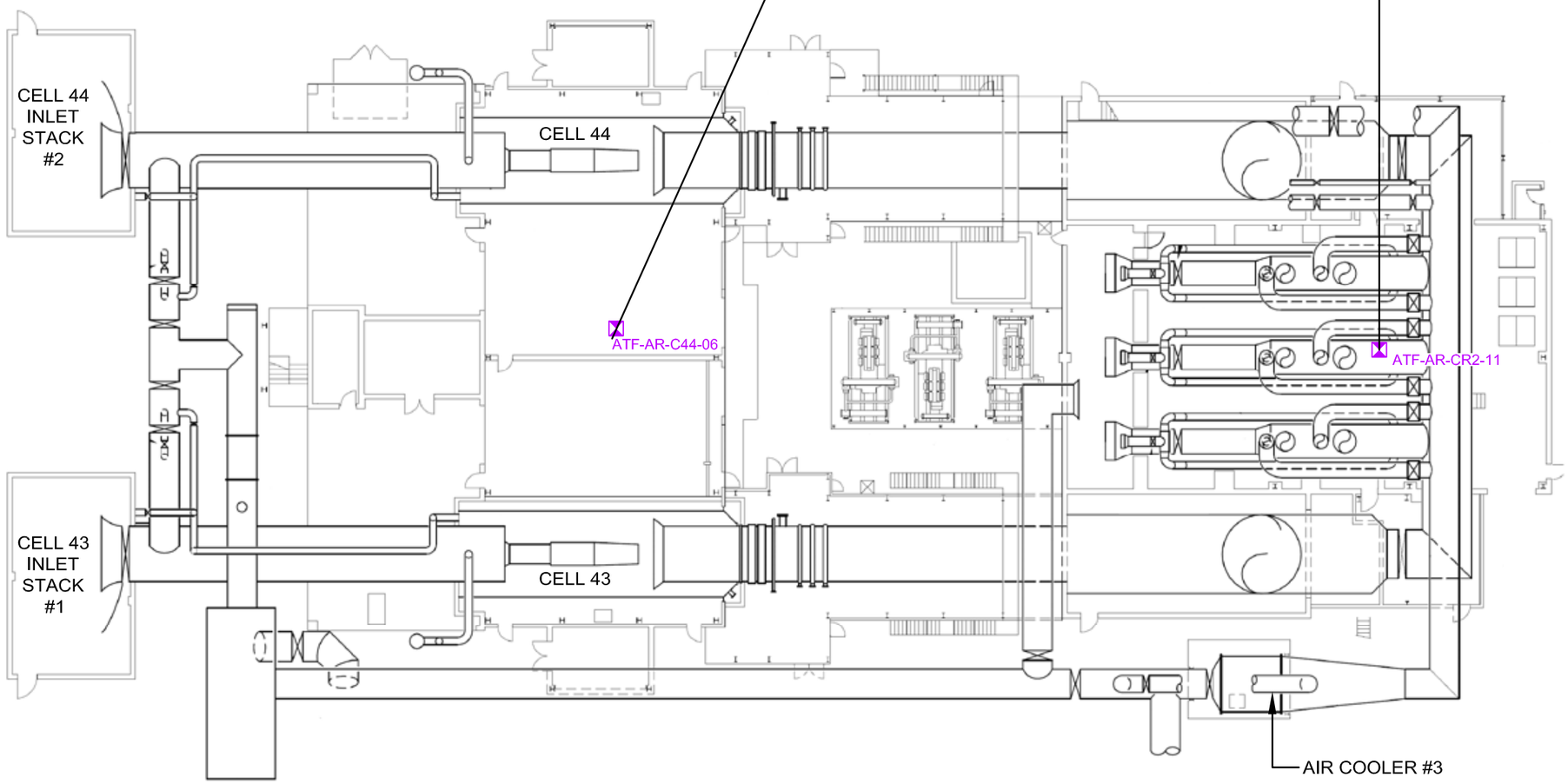
Abbreviations:

ATF - Altitude Test Facility
AR - PCB air sample
C44 - Test Cell #44
CR2 - compressor room-second floor
PCBs - polychlorinated biphenyls
ng/m^3 - nanograms per cubic meter

Figure 1

ATF–AR–C44–06	
DATE	7/2/2014
TOTAL PCBs (ng/m³)	26.8 J

ATF–AR–CR2–11	
DATE	7/2/2014
TOTAL PCBs (ng/m³)	ND



NOT TO SCALE

LEGEND:

AMBIENT PCB AIR MONITORING LOCATION

SAMPLING NOMENCLATURE:

ATF – ALTITUDE TEST FACILITY

AR – PCB AIR SAMPLE

C44 – TEST CELL #44

CR2 – COMPRESSOR ROOM SECOND FLOOR

NOTES:

1. SAMPLING LOCATIONS ARE APPROXIMATE.
2. ng/m³ – NANOGRAMS PER CUBIC METER
3. TOTAL PCBs – THE SUM OF AROCLORS 1016 THROUGH 1268.
4. J – DENOTES AN ESTIMATED CONCENTRATION. THE CONCENTRATION RESULT IS GREATER THAN OR EQUAL TO THE METHOD DETECTION LIMIT (MDL) BUT LESS THAN THE PQL.

GE-AVIATION
CINCINNATI, OHIO
AIR TEST SUMMARY REPORT

DATA SUMMARY - PCB RESULTS
AMBIENT PCB AIR MONITORING

ARCADIS

FIGURE
1

CITY: SYRACUSE, NY DIV/GROUP: ENVCAD DB: L.POSENAUER LD:(Opt) PIC:(Opt) PM: C.AVERILL TM:(Opt) LYR:(Opt)ON=*;OFF=*REF*
V:\ENVCAD\SYRACUSE\ACTIN\B0031335\2013\RES01\ATSR\31335C07.dwg LAYOUT: 1 SAVED: 7/21/2014 2:56 PM ACADVER: 18.1S (LMS TECH) PAGESETUP: ---- PLOTSTYLETABLE: PLTFULL.CTB PLOTTED: 7/29/2014 2:43 PM BY: POSENAUER, LISA
XREFS: 31335X00 IMAGES: 31335X01.png

Attachment 1

GC #: **GC-20 8082 High Level Hydrogen**
Method: **Method 3**
Column: **GC20F ZB-1MS 20M 0.18mm 0.18um**
GC20B ZB-5 20M 0.18mm 0.18um
Date: 7/9/2014
Analyst: JKA
File Name: C:\Users\KELLYH~1.NOR\AppData\Local\Temp\XPgrpwise\[GC20_Parameters_1_1.xls]8082 HL H2

Sample Delivery: SEE LEAP PARAMETERS

Column Oven:

Step	Temp (°C)	Rate (°C/min)	Hold (min)	Total (min)
Initial	150	-------	1.41	1.41
1	290	17.5	0.65	10.06

Stabilization Time (min): 0.5

Injector: Front CP-1177

1177 Oven Power: ON
1177 Temperature (°C) 300

Time	Split State	Split Ratio
Initial	ON	35

Flow/PSI(Front_EFC, Type 1):

Step	Pres (psi)	Rate (psi/min)	Hold (min)	Total (min)
Initial	*	-------	10	10

Constant Flow Mode Enable: NO
Column Flow Rate (ml/min): 1.5

Injector: Middle CP-1177

1177 Oven Power: ON
1177 Temperature (°C) 300

Time	Split State	Split Ratio
Initial	ON	30

Flow/PSI(Front_EFC, Type 1):

Step	Pres (psi)	Rate (psi/min)	Hold (min)	Total (min)
Initial	*	-------	10	10

Constant Flow Mode Enable: NO
Column Flow Rate (ml/min): 1.5

Detector: **Front ECD**

ECD Oven Power: ON
Temperature (°C) 300
Electronics: ON
Range: 1

Time	Range	Autozero
Initial	1	YES

ECD Adjustment
Time Constant: Fast
Cell Current: CAP
Contact Potential (mV): *

Middle ECD

ECD Oven Power: ON
Temperature (°C) 300
Electronics: ON
Range: 1

Time	Range	Autozero
Initial	1	YES

Fast
CAP
*

Front ECD Adjustments
Make-up Flow (mL/min) 35

Middle ECD Adjustments
35

Analog Output

Detectors: Front: ECD
Middle: ECD
Rear: None

*values may change with use

Time	Signal Source	Attenuation
Initial	Front Detector	1
Time	Signal Source	Attenuation
Initial	Middle Detector	1
Time	Signal Source	Attenuation
Initial	Rear Detector	1

Valve Table:

Time	1 None	2 None	3 None	4 None	5 None	6 None	7 None
Initial	-----	-----	-----	-----	-----	-----	-----

Initial valve state=Off

6

ARCADIS of New York, Inc.
6723 Towpath Road
P O Box: 66
Syracuse
New York 13214-0066
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Fax 315 449 0017
www.arcadis-us.com

ENVIRONMENT

PCB Coordinator
U.S. EPA Region 5
Mailstop LU-9J
77 W. Jackson Blvd
Chicago, IL 60604

Subject:
GE Aviation – Altitude Test Facility
Data Summary of Twelfth Air Sampling Event – July 2014

Date:
August 19, 2014

Dear PCB Coordinator:

On July 24, 2014, GE Aviation, an operating division of the General Electric Company (GE), performed indoor air testing activities at the Altitude Test Facility (ATF) at GE's facility in Evendale, Ohio, in accordance with EPA's January 16, 2014 amendment to EPA's December 19, 2012 approval allowing GE to use the ATF for jet engine testing pursuant to 40 CFR § 761.62(c). This report is being submitted pursuant to Consent Agreement and Final Order (TSCA-05-2014-0008) filed on April 28, 2014.

GE collected two indoor air samples at the ATF on July 24, 2014, prior to active jet engine testing in July 2014 and received the laboratory report containing the results on August 8th, 2014. One sample was "Non-Detect" for PCBs, and the second sample had low but detectable results for PCBs, estimated at 158.7 nanograms per cubic meter (ng/m^3), well below the NIOSH standard of 1,000 ng/m^3. (Note that Non-Detect denote that analytes were not detected at concentrations greater than the laboratory practical quantitation limit - PQL.) Further details for the sampling event follow in the report and **Table 1**.

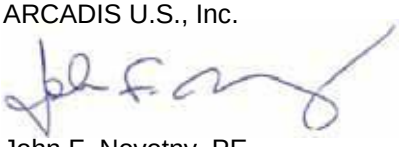
Air test sample ATF-AR-C43-07, located adjacent to the #43 Test Cell Chamber of the ATF, and air test sample ATF-AR-CR2-12, located on the second floor of the compressor room, were both collected over an 8-hour interval. The samples were collected on July 24, 2014, during routine facility maintenance, prior to conducting jet engine testing activities. Both air pumps were placed in a manner such that the air sample would be collected from the breathing zone, in the room where employees were performing work tasks. Both air pumps used for this event were programmed for a flow rate of 5.0 Liters/minute for a total run time of eight hours. Calibration and preparation of air samples followed Method TO-10A: Compendium of Methods for Toxic Organic Air Pollution. During the sampling event, a total volume of 2,400 Liters was pumped through each sample collection media.

The laboratory analytical results of the sampling event are provided in the Data Summary Table, attached as **Table 1** and the sampling locations are provided on the attached **Figure 1**. As indicated in the attachments, sample ATF-AR-C43-07 (collected adjacent to Test Cell #43) had "non-detect" levels of PCBs ng/m^3, and sample ATF-AR-CR2-12 (collected from the second floor ATF compressor room) had a detected level of PCBs of 158.7 ng/m^3. The laboratory quantitation limit (PQL) for these results was 41.7 ng/m^3, with a final extraction volume of 5.0 mL. The specific operating parameters of the analytical instruments used by PACE Analytical during sample analysis are detailed in **Attachment 1**.

Please do not hesitate to contact John Rumpf, Counsel for Environmental Affairs at GE Aviation, at (513) 243-4256 or Christopher Bell at Greenberg Traurig LLP at (713) 374-3556 if you have any questions.

Sincerely,

ARCADIS U.S., Inc.



John F. Novotny, PE
Senior Engineer

Attachments
Table 1
Figure 1
Attachment 1

Copies:
John Rumpf, GE
Christopher Bell, Greenberg Traurig, LLP

Table 1

Table 1
Data Summary - PCB Air Monitoring - July 2014

GE - Aviation - Altitude Test Facility
Cincinnati, Ohio

Sampling ID	Date Collected	Time Collected	Sample Type	Total PCBs (ng/m^3)	Location Description
Event 12					
ATF-AR-C43-07	7/24/2014	17:30	Air	ND	Test Cell 43 open floor area
ATF-AR-CR2-12	7/24/2014	17:35	Air	158.7	Second floor of ATF Compressor Room

Notes:

1. Samples collected by ARCADIS personnel and submitted to Pace Analytical Laboratory for analysis using USEPA Compendium Method TO-10A procedures.
2. Air pumps were set up at breathing zone height and operated over an 8-hour interval at an air intake rate of approximately 5 L/min, resulting in approximately 2,400 L of air pulled through the puff for each sample.
3. Event 12 took place at the ATF on July 24, 2014 conducting prior to jet engine testing in July 2014.
4. Total PCBs - the sum of aroclors 1016 through 1268
5. The final extraction volume of 5.0 mL was conducted by the laboratory.
6. The initial injection volume of 1µL was conducted by the laboratory.
7. the Laboratory determined no sample breakthrough occurred on all sample media.
8. ND (Non-Detect) - Denotes analyte not detected at a concentration greater than the MDL
9. PQL (Practical Quantitation Limit) of 41.7 ng/m^3 per aroclor. Denotes lowest analyte concentration reportable for the sample.
10. Time Collected, denotes the time which the air pumps completed the 8-hour run interval.
11. J - Denotes an estimated concentration. The concentration result is greater than or equal to the Method Detection Limit (MDL) but less than the PQL.

Abbreviations:

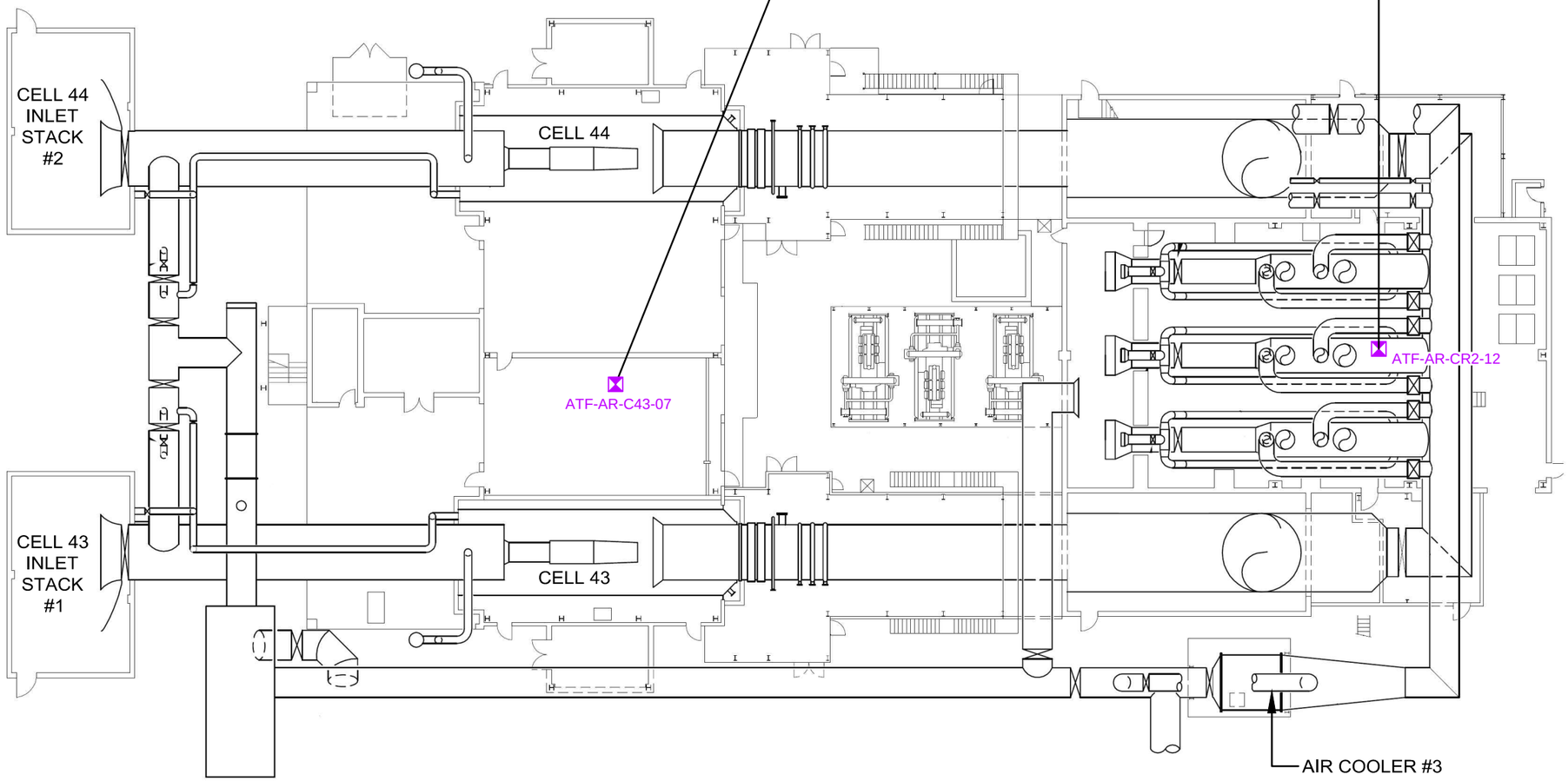
ATF - Altitude Test Facility
AR - PCB air sample
C43 - Test Cell #43
CR2 - compressor room-second floor
PCBs - polychlorinated biphenyls
ng/m^3 - nanograms per cubic meter

ARCADIS

Figure 1

ATF–AR–C43–07	
DATE	7/24/2014
TOTAL PCBs (ng/m³)	ND

ATF–AR–CR2–12	
DATE	7/24/2014
TOTAL PCBs (ng/m³)	158.7



NOT TO SCALE

LEGEND:

AMBIENT PCB AIR MONITORING LOCATION

SAMPLING NOMENCLATURE:

ATF – ALTITUDE TEST FACILITY

AR – PCB AIR SAMPLE

C43 – TEST CELL #43

CR2 – COMPRESSOR ROOM SECOND FLOOR

NOTES:

1. SAMPLING LOCATIONS ARE APPROXIMATE.
2. ng/m³ – NANOGRAMS PER CUBIC METER
3. TOTAL PCBs – THE SUM OF AROCLORS 1016 THROUGH 1268.
4. J – DENOTES AN ESTIMATED CONCENTRATION. THE CONCENTRATION RESULT IS GREATER THAN OR EQUAL TO THE METHOD DETECTION LIMIT (MDL) BUT LESS THAN THE PQL.

GE-AVIATION
CINCINNATI, OHIO
AIR TEST SUMMARY REPORT

DATA SUMMARY - PCB RESULTS
AMBIENT PCB AIR MONITORING

ARCADIS

FIGURE
1

CITY: SYRACUSE, NY DIV/GROUP: ENVCAD DB: L.POSENAUER LD:(Opt) PIC:(Opt) PM: C.AVERILL TM:(Opt) LYR:(Opt)ON=*;OFF=*REF*
V:\ENVCAD\SYRACUSE\ACTIN\B0031335\2013\RES01\ATSR\31335C08.dwg LAYOUT: 1 SAVED: 8/11/2014 2:42 PM ACADVER: 18.1S (LMS TECH) PAGESETUP: ---- PLOTSTYLETABLE: PLTFULL.CTB PLOTTED: 8/11/2014 2:45 PM BY: POSENAUER, LISA
XREFS: 31335X00 IMAGES: 31335X01.png

Attachment 1

GC #: **GC-20 8082 High Level Hydrogen**
Method: **Method 3**
Column: **GC20F ZB-1MS 20M 0.18mm 0.18um**
GC20B ZB-5 20M 0.18mm 0.18um
Date: 7/9/2014
Analyst: JKA
File Name: C:\Users\KELLYH~1.NOR\AppData\Local\Temp\XPgrpwise\[GC20_Parameters_1.xls]8082 HL H2

Sample Delivery: SEE LEAP PARAMETERS

Column Oven:

Step	Temp (°C)	Rate (°C/min)	Hold (min)	Total (min)
Initial	150	-------	1.41	1.41
1	290	17.5	0.65	10.06

Stabilization Time (min): 0.5

Injector: Front CP-1177

1177 Oven Power: ON
1177 Temperature (°C) 300

Time	Split State	Split Ratio
Initial	ON	35

Flow/PSI(Front EFC, Type 1):

Step	Pres (psi)	Rate (psi/min)	Hold (min)	Total (min)
Initial	*	-------	10	10

Constant Flow Mode Enable: NO
Column Flow Rate (ml/min): 1.5

Injector: Middle CP-1177

1177 Oven Power: ON
1177 Temperature (°C) 300

Time	Split State	Split Ratio
Initial	ON	30

Flow/PSI(Front EFC, Type 1):

Step	Pres (psi)	Rate (psi/min)	Hold (min)	Total (min)
Initial	*	-------	10	10

Constant Flow Mode Enable: NO
Column Flow Rate (ml/min): 1.5

Detector: **Front ECD**

ECD Oven Power: ON
Temperature (°C) 300
Electronics: ON
Range: 1

Time	Range	Autozero
Initial	1	YES

ECD Adjustment
Time Constant: Fast
Cell Current: CAP
Contact Potential (mV): *

Middle ECD

ECD Oven Power: ON
Temperature (°C) 300
Electronics: ON
Range: 1

Time	Range	Autozero
Initial	1	YES

Fast
CAP
*

Front ECD Adjustments
Make-up Flow (mL/min) 35

Middle ECD Adjustments
35

Analog Output

Detectors: Front: ECD
Middle: ECD
Rear: None

*values may change with use

Time	Signal Source	Attenuation
Initial	Front Detector	1
Time	Signal Source	Attenuation
Initial	Middle Detector	1
Time	Signal Source	Attenuation
Initial	Rear Detector	1

Valve Table:

Time	1 None	2 None	3 None	4 None	5 None	6 None	7 None
Initial	-----	-----	-----	-----	-----	-----	-----

Initial valve state=Off

6

ARCADIS of New York, Inc.
6723 Towpath Road
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Syracuse
New York 13214-0066
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Fax 315 449 0017
www.arcadis-us.com

ENVIRONMENT

PCB Coordinator
U.S. EPA Region 5
Mailstop LU-9J
77 W. Jackson Blvd
Chicago, IL 60604

Subject:
GE Aviation – Altitude Test Facility
Data Summary of Thirteenth Air Sampling Event – August 2014

Date:
September 10, 2014

Dear PCB Coordinator:

On August 18, 2014, GE Aviation, an operating division of the General Electric Company (GE), performed indoor air testing activities at the Altitude Test Facility (ATF) at GE's facility in Evendale, Ohio, in accordance with EPA's January 16, 2014 amendment to EPA's December 19, 2012 approval allowing GE to use the ATF for jet engine testing pursuant to 40 CFR § 761.62(c). This report is being submitted pursuant to Consent Agreement and Final Order (TSCA-05-2014-0008) filed on April 28, 2014.

GE collected two indoor air samples at the ATF on August 18, 2014, during active jet engine testing in August 2014 and received the laboratory report containing the results on September 3rd, 2014. Both samples were "Non-Detect" for PCBs ng/m^3, well below the NIOSH standard of 1,000 ng/m^3. (Non-Detect means that analytes were not detected at concentrations greater than the laboratory practical quantitation limit – PQL, which was 41.7 ng/m^3.) Further details for the sampling event follow in the report and **Table 1**.

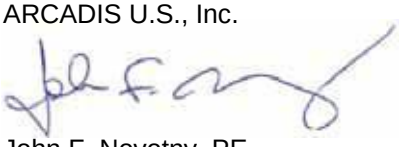
Air test sample ATF-AR-C43-08, located adjacent to the #43 Test Cell Chamber of the ATF, and air test sample ATF-AR-CR2-13, located on the second floor of the compressor room, were both collected over an 8-hour interval. The samples were collected on August 18, 2014, during routine jet engine testing activities. Both air pumps were placed in a manner such that the air sample would be collected from the breathing zone, in the room where equipment was in operation during engine tests. Both air pumps used for this event were programmed for a flow rate of 5.0 L/minute for a total run time of eight hours. Calibration and preparation of air samples followed Method TO-10A: Compendium of Methods for Toxic Organic Air Pollution. During the sampling event, a total volume of 2,400 Liters was pumped through each sample collection media.

The laboratory analytical results of the sampling event are provided in the Data Summary Table, attached as **Table 1** and the sampling locations are provided on the attached **Figure 1**. As indicated in the attachments, sample ATF-AR-C43-08 (collected adjacent to Test Cell #43) had "non-detect" levels of PCBs ng/m^3, and sample ATF-AR-CR2-13 (collected from the second floor ATF compressor room had "non-detect" levels of PCBs ng/m^3. The laboratory quantitation limit (PQL) for these results was 41.7 ng/m^3, with a final extraction volume of 5.0 mL. The specific operating parameters of the analytical instruments used by PACE Analytical during sample analysis are detailed in **Attachment 1**.

Please do not hesitate to contact John Rumpf, Counsel for Environmental Affairs at GE Aviation, at (513) 243-4256 or Christopher Bell at Greenberg Traurig LLP at (713) 374-3556 if you have any questions.

Sincerely,

ARCADIS U.S., Inc.



John F. Novotny, PE
Senior Engineer

Attachments
Table 1
Figure 1
Attachment 1

Copies:
John Rumpf, GE
Christopher Bell, Greenberg Traurig, LLP

Table 1

Table 1
Data Summary - PCB Air Monitoring - August 2014

GE - Aviation - Altitude Test Facility
Cincinnati, Ohio

Sampling ID	Date Collected	Time Collected	Sample Type	Total PCBs (ng/m^3)	Location Description
Event 13					
ATF-AR-C43-07	8/18/2014	15:15	Air	ND	Test Cell 43 open floor area
ATF-AR-CR2-12	8/18/2014	15:20	Air	ND	Second floor of ATF Compressor Room

Notes:

1. Samples collected by ARCADIS personnel and submitted to Pace Analytical Laboratory for analysis using USEPA Compendium Method TO-10A procedures.
2. Air pumps were set up at breathing zone height and operated over an 8-hour interval at an air intake rate of approximately 5 L/min, resulting in approximately 2,400 L of air pulled through the puff for each sample.
3. Event 12 took place at the ATF on August 18, 2014 conducting prior to jet engine testing in July 2014.
4. Total PCBs - the sum of aroclors 1016 through 1268
5. The final extraction volume of 5.0 mL was conducted by the laboratory.
6. The initial injection volume of 1µL was conducted by the laboratory.
7. the Laboratory determined no sample breakthrough occurred on all sample media.
8. ND (Non-Detect) - Denotes analyte not detected at a concentration greater than the MDL
9. PQL (Practical Quantitation Limit) of 41.7 ng/m^3 per aroclor. Denotes lowest analyte concentration reportable for the sample.
10. Time Collected, denotes the time which the air pumps completed the 8-hour run interval.
11. J - Denotes an estimated concentration. The concentration result is greater than or equal to the Method Detection Limit (MDL) but less than the PQL.

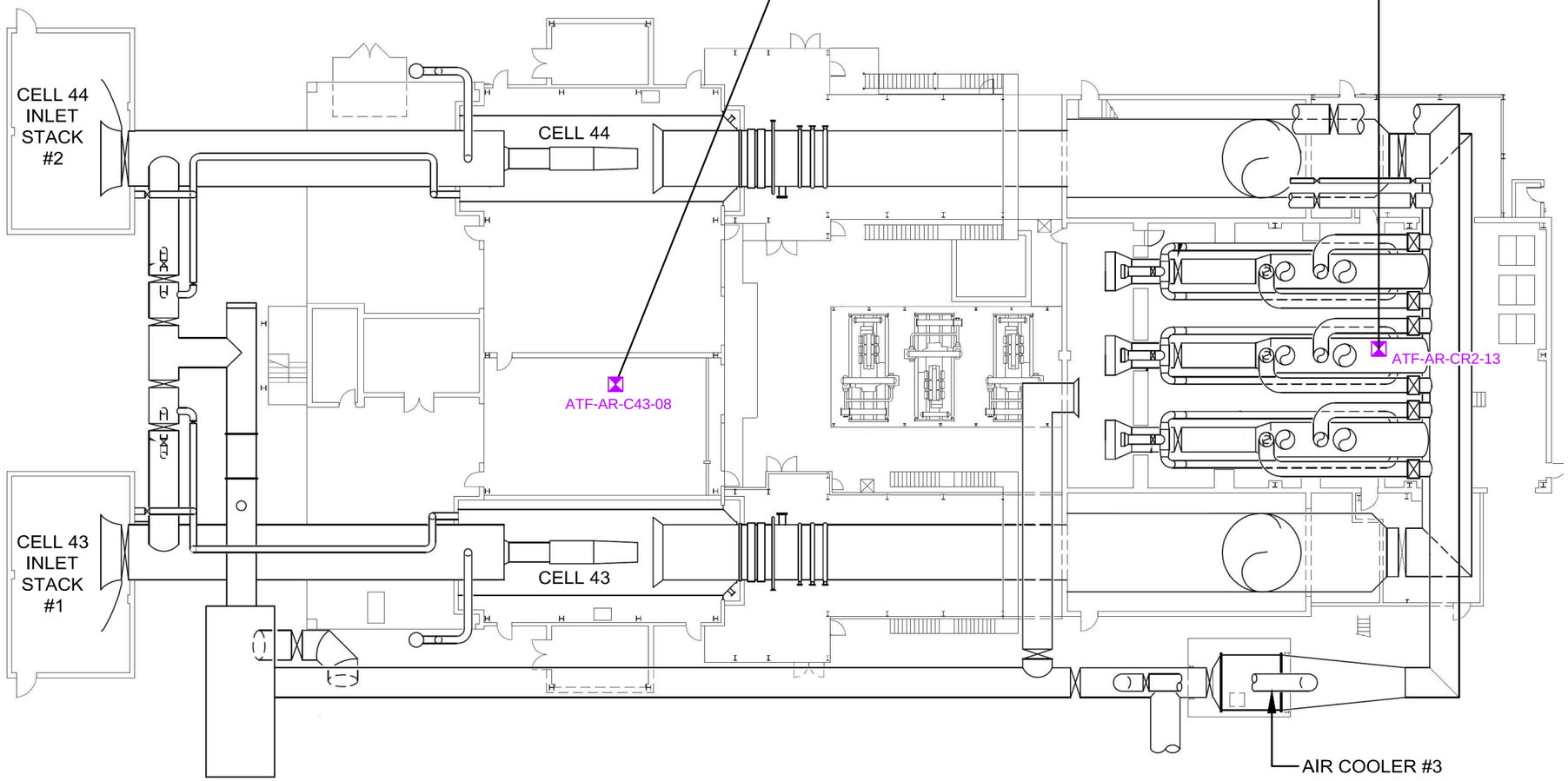
Abbreviations:

ATF - Altitude Test Facility
AR - PCB air sample
C43 - Test Cell #43
CR2 - compressor room-second floor
PCBs - polychlorinated biphenyls
ng/m^3 - nanograms per cubic meter

Figure 1

ATF–AR–C43–08	
DATE	8/18/2014
TOTAL PCBs (ng/m³)	ND

ATF–AR–CR2–13	
DATE	8/18/2014
TOTAL PCBs (ng/m³)	ND



NOT TO SCALE

LEGEND:

AMBIENT PCB AIR MONITORING LOCATION

SAMPLING NOMENCLATURE:

ATF – ALTITUDE TEST FACILITY

AR – PCB AIR SAMPLE

C43 – TEST CELL #43

CR2 – COMPRESSOR ROOM SECOND FLOOR

NOTES:

1. SAMPLING LOCATIONS ARE APPROXIMATE.
2. ng/m³ – NANOGRAMS PER CUBIC METER
3. TOTAL PCBs – THE SUM OF AROCLORS 1016 THROUGH 1268.
4. J – DENOTES AN ESTIMATED CONCENTRATION. THE CONCENTRATION RESULT IS GREATER THAN OR EQUAL TO THE METHOD DETECTION LIMIT (MDL) BUT LESS THAN THE PQL.

GE-AVIATION
CINCINNATI, OHIO
AIR TEST SUMMARY REPORT

DATA SUMMARY - PCB RESULTS
AMBIENT PCB AIR MONITORING

ARCADIS

FIGURE
1

CITY: SYRACUSE, NY DIV/GROUP: ENVCAD DB: L.POSENAUER LD:(Opt) PIC:(Opt) PM: C.AVERILL TM:(Opt) LYR:(Opt)ON=*;OFF=*REF*
V:\ENVCAD\SYRACUSE\ACTIN\B0031335\2013\RES01\ATSR\31335C09.dwg LAYOUT: 1 SAVED: 9/4/2014 1:41 PM ACADVER: 18.1S (LMS TECH) PAGESETUP: ---- PLOTSTYLETABLE: PLTFULL.CTB PLOTTED: 9/4/2014 1:41 PM BY: POSENAUER, LISA
XREFS: 31335X00 IMAGES: 31335X01.png

Attachment 1

GC-10 8082 High Level Method - Hydrogen

GC #:	**10**
Method:	**Hydrogen 8082**
GC Method #:	**2**
Date:	**2/15/2013**
Analyst:	**MCA**
File Name:	
Column:	**Front ZB-1 MS 20m 0.18 0.18**
	Middle ZB-5 20m 0.18 0.18

Sample Delivery: SEE LEAP PARAMETERS

Column Oven:

Step	Temp (°C)	Rate (°C/min)	Hold (min)	Total (min)
Initial	150		1.41	1.41
	290	17.5	0.65	10.06

Stabilization Time (min): 0.5

Injector: Front CP-1177

1177 Oven Power: ON
1177 Temperature (°C) 300

Time	Split State	Split Ratio
Initial	ON	30

Injector: Middle CP-1177

1177 Oven Power: ON
1177 Temperature (°C) 300

Time	Split State	Split Ratio
Initial	ON	30

Flow/PSI(Front EFC, Type 1):
Carrier Gas Hydrogen

Step	Pres (psi)	Rate (psi/min)	Hold (min)	Total (min)
Initial	*		10.00	10.00

Constant Flow Mode Enable: NO
Column Flow Rate (ml/min): 2.1

Flow/PSI(Front EFC, Type 1):

Step	Pres (psi)	Rate (psi/min)	Hold (min)	Total (min)
Initial	*		10.00	10.00

Constant Flow Mode Enable: NO
Column Flow Rate (ml/min): 2.1

Detector:

	Front ECD	Middle ECD
ECD Oven Power:	ON	ON
Temperature (°C)	300	300
Electronics:	ON	ON
Range:	1	1

Time	Range	Autozero
Initial	1	YES

Time	Range	Autozero
Initial	1	YES

Front ECD Adjustment

Time Constant:	Fast	Fast
Cell Current:	CAP	CAP
Contact Potential (mV):	*	*
Make-Up Flow (ml/min):	35.0	35.0

*values may change with use

Analog Output

Detectors: Front: ECD Attenuation 1
Middle: ECD Attenuation 1
Rear: None

Time	Signal Source	Attenuation
Initial	Front Detector	1
Time	Signal Source	Attenuation
Initial	Middle Detector	1
Time	Signal Source	Attenuation
Initial	Rear Detector	1

Valve Table:

Time	1 None	2 None	3 None	4 None	5 None	6 None	7 None
Initial	-----	-----	-----	-----	-----	-----	-----

Initial valve state=Off

Heated Zones

Zone	Type	Temp Limit	Location	Coolant
Col. Oven	Col. Oven	350C	Col. Oven	None
1	1177	350C	Front	None
2	1177	350C	Middle	None
3	None	450C	None	None
4	ECD	350C	Front	None
5	ECD	350C	Middle	None
6	None	450C	None	None

Column Parameters:

Location	Carrier	Length	ID
Front	H	20 m	180
Middle	H	20 m	180

6

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ENVIRONMENT

PCB Coordinator
U.S. EPA Region 5
Mailstop LU-9J
77 W. Jackson Blvd
Chicago, IL 60604

Subject:
GE Aviation – Altitude Test Facility
Data Summary of Fourteenth Air Sampling Event – August 2014

Date:
September 21, 2014

Dear PCB Coordinator:

On August 26, 2014, GE Aviation, an operating division of the General Electric Company (GE), performed indoor air testing activities at the Altitude Test Facility (ATF) at GE's facility in Evendale, Ohio, in accordance with EPA's January 16, 2014 amendment to EPA's December 19, 2012 approval allowing GE to use the ATF for jet engine testing pursuant to 40 CFR § 761.62(c). This report is being submitted pursuant to Consent Agreement and Final Order (TSCA-05-2014-0008) filed on April 28, 2014.

GE collected two indoor air samples at the ATF on August 26, 2014, following the completion of active jet engine testing in August 2014 and received the laboratory report containing the results on September 10th, 2014. One sample was "Non-Detect" for PCBs, and the second sample had estimated low but detectable results for PCBs, estimated at 26.1 nanograms per cubic meter (ng/m^3), well below the NIOSH standard of 1,000 ng/m^3. (Note that Non-Detect denote that analytes were not detected at concentrations greater than the laboratory practical quantitation limit - PQL.) Further details for the sampling event follow in the report and **Table 1**.

Air test sample ATF-AR-C44-07, located adjacent to the #44 Test Cell Chamber of the ATF, and air test sample ATF-AR-CR2-14, located on the second floor of the compressor room, were both collected over an 8-hour interval. The samples were collected on August 26, 2014, following the completion of routine jet engine testing activities. Both air pumps were placed in a manner such that the air sample would be collected from the breathing zone, in the room where equipment was in operation during engine tests. Both air pumps used for this event were programmed for a flow rate of 5.0 L/minute for a total run time of eight hours. Calibration and preparation of air samples followed Method TO-10A: Compendium of Methods for Toxic Organic Air Pollution. During the sampling event, a total volume of 2,400 Liters was pumped through each sample collection media.

The laboratory analytical results of the sampling event are provided in the Data Summary Table, attached as **Table 1** and the sampling locations are provided on the attached **Figure 1**. As indicated in the attachments, sample ATF-AR-C44-07 (collected adjacent to Test Cell #44) had "non-detect" levels of PCBs ng/m^3, and sample ATF-AR-CR2-14 (collected from the second floor ATF compressor room had an estimated detection level of PCBs of 26.1 ng/m^3. The laboratory quantitation limit (PQL) for these results was 41.7 ng/m^3, with a final extraction volume of 5.0 mL. The specific operating parameters of the analytical instruments used by PACE Analytical during sample analysis are detailed in **Attachment 1**.

Please do not hesitate to contact John Rumpf, Counsel for Environmental Affairs at GE Aviation, at (513) 243-4256 or Christopher Bell at Greenberg Traurig LLP at (713) 374-3556 if you have any questions.

Sincerely,

ARCADIS U.S., Inc.

John F. Novotny, PE
Senior Engineer

Attachments
Table 1
Figure 1
Attachment 1

Copies:
John Rumpf, GE
Christopher Bell, Greenberg Traurig, LLP

Table 1
Data Summary - PCB Air Monitoring - August 2014

GE - Aviation - Altitude Test Facility
Cincinnati, Ohio

Sampling ID	Date Collected	Time Collected	Sample Type	Total PCBs (ng/m^3)	Location Description
Event 14					
ATF-AR-C44-07	8/26/2014	15:20	Air	ND	Test Cell 44 open floor area
ATF-AR-CR2-14	8/26/2014	15:30	Air	26.1 J	Second floor of ATF Compressor Room

Notes:

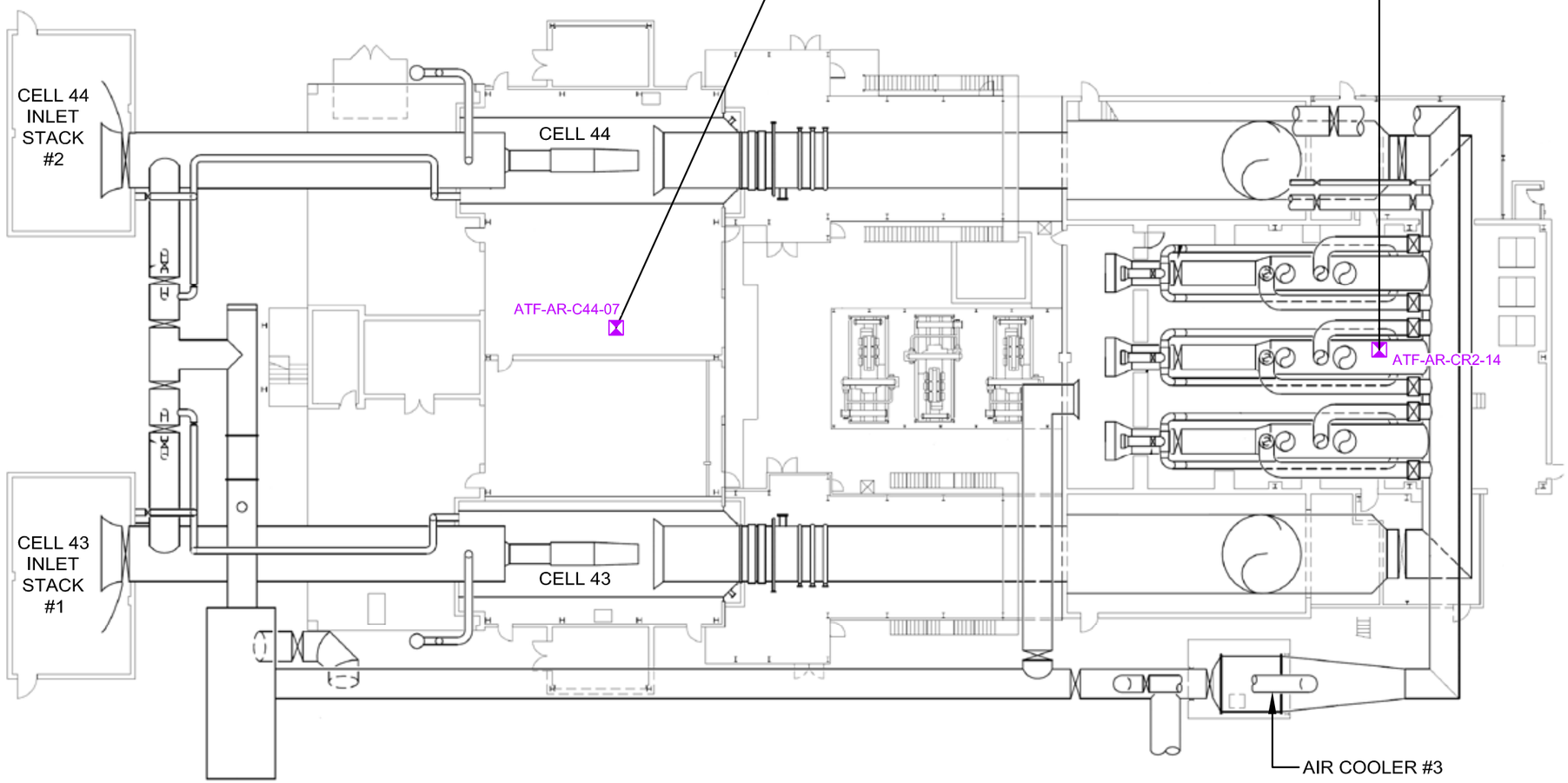
1. Samples collected by ARCADIS personnel and submitted to Pace Analytical Laboratory for analysis using USEPA Compendium Method TO-10A procedures.
2. Air pumps were set up at breathing zone height and operated over an 8-hour interval at an air intake rate of approximately 5 L/min, resulting in approximately 2,400 L of air pulled through the puff for each sample.
3. Event 14 took place at the ATF on August 26, 2014 conducting following to jet engine testing in August 2014.
4. Total PCBs - the sum of aroclors 1016 through 1268
5. The final extraction volume of 5.0 mL was conducted by the laboratory.
6. The initial injection volume of 1µL was conducted by the laboratory.
7. the Laboratory determined no sample breakthrough occurred on all sample media.
8. ND (Non-Detect) - Denotes analyte not detected at a concentration greater than the MDL
9. PQL (Practical Quantitation Limit) of 41.7 ng/m^3 per aroclor. Denotes lowest analyte concentration reportable for the sample.
10. Time Collected, denotes the time which the air pumps completed the 8-hour run interval.
11. J - Denotes an estimated concentration. The concentration result is greater than or equal to the Method Detection Limit (MDL) but less than the PQL.

Abbreviations:

ATF - Altitude Test Facility
AR - PCB air sample
C44 - Test Cell #44
CR2 - compressor room-second floor
PCBs - polychlorinated biphenyls
ng/m^3 - nanograms per cubic meter

ATF–AR–C44–07	
DATE	8/26/2014
TOTAL PCBs (ng/m³)	ND

ATF–AR–CR2–14	
DATE	8/26/2014
TOTAL PCBs (ng/m³)	26.1 J



NOT TO SCALE

LEGEND:

AMBIENT PCB AIR MONITORING LOCATION

SAMPLING NOMENCLATURE:

ATF – ALTITUDE TEST FACILITY

AR – PCB AIR SAMPLE

C44 – TEST CELL #44

CR2 – COMPRESSOR ROOM SECOND FLOOR

NOTES:

1. SAMPLING LOCATIONS ARE APPROXIMATE.
2. ng/m³ – NANOGRAMS PER CUBIC METER
3. TOTAL PCBs – THE SUM OF AROCLORS 1016 THROUGH 1268.
4. J – DENOTES AN ESTIMATED CONCENTRATION. THE CONCENTRATION RESULT IS GREATER THAN OR EQUAL TO THE METHOD DETECTION LIMIT (MDL) BUT LESS THAN THE PQL.

GE-AVIATION
CINCINNATI, OHIO
AIR TEST SUMMARY REPORT

DATA SUMMARY - PCB RESULTS
AMBIENT PCB AIR MONITORING

ARCADIS

FIGURE
1

CITY: SYRACUSE, NY DIV/GROUP: ENVCAD DB: L.POSENAUER LD:(Opt) PIC:(Opt) PM: C.AVERILL TM:(Opt) LYR:(Opt)ON=*;OFF=*REF*
V:\ENVCAD\SYRACUSE\ACTIN\B0031335\2013\RES01\ATSR\31335C10.dwg LAYOUT: 1 SAVED: 9/15/2014 8:50 AM ACADVER: 18.1S (LMS TECH) PAGESETUP: ---- PLOTSTYLETABLE: PLTFULL.CTB PLOTTED: 9/15/2014 8:50 AM BY: POSENAUER, LISA
XREFS: 31335X00 IMAGES: 31335X01.png

GC #: **GC-21 8082 High Level Method HYDROGEN**
Method: **Method 3**
Column: **GC21F ZB-1MS 20M 0.18mm 0.18um**
GC21B ZB-5 20M 0.18mm 0.18um
Date: 2/15/2013
Analyst: JKA
File Name: C:\Users\KELLYH~1.NOR\AppData\Local\Temp\XPgrpwise\[GC21_Parameters_1.xls]8082 H2 HL

Sample Delivery: SEE LEAP PARAMETERS

Column Oven:

Step	Temp (°C)	Rate (°C/min)	Hold (min)	Total (min)
Initial	150	-------	1.41	1.41
1	290	17.5	0.65	10.06

Stabilization Time (min): 0.50

Injector: Front CP-1177

1177 Oven Power: ON
1177 Temperature (°C) 300

Time	Split State	Split Ratio
Initial	ON	35

Flow/PSI(Front_EFC, Type 1):
Carrier Gas : Helium

Step	Pres (psi)	Rate (psi/min)	Hold (min)	Total (min)
Initial	*	-------	10	10

Constant Flow Mode Enable: NO
Column Flow Rate (ml/min): 2.3

Injector: Middle CP-1177

1177 Oven Power: ON
1177 Temperature (°C) 300

Time	Split State	Split Ratio
Initial	ON	35

Flow/PSI(Front_EFC, Type 1):

Step	Pres (psi)	Rate (psi/min)	Hold (min)	Total (min)
Initial	*	-------	10	10

Constant Flow Mode Enable: NO
Column Flow Rate (ml/min): 2.6

Detector: **Front ECD**

ECD Oven Power: ON
Temperature (°C) 300
Electronics: ON
Range: 1

Time	Range	Autozero
Initial	1	YES

Front ECD Adjustment
Time Constant: Fast
Cell Current: CAP
Contact Potential (mV): *

Middle ECD

ECD Oven Power: ON
Temperature (°C) 300
Electronics: ON
Range: 1

Time	Range	Autozero
Initial	1	YES

Fast
CAP
*

*values may change with use

Front ECD Adjustments
Make-up Flow (mL/min) 30

Middle ECD Adjustments
Make-up Flow (mL/min) 35

Analog Output

Detectors: Front: ECD Attenuation 1
Middle: ECD Attenuation 1
Rear: None

Time	Signal Source	Attenuation
Initial	Front Detector	1
Time	Signal Source	Attenuation
Initial	Middle Detector	1
Time	Signal Source	Attenuation
Initial	Rear Detector	1

Valve Table:

Time	1 None	2 None	3 None	4 None	5 None	6 None	7 None
Initial	-----	-----	-----	-----	-----	-----	-----

Initial valve state=Off

6

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ENVIRONMENT

Date:
September 29, 2014

PCB Coordinator
U.S. EPA Region 5
Mailstop LU-9J
77 W. Jackson Blvd
Chicago, IL 60604

Subject:
GE Aviation – Altitude Test Facility
Data Summary of Fifteenth Air Sampling Event – September 2014

Dear PCB Coordinator:

On September 8, 2014, GE Aviation, an operating division of the General Electric Company (GE), performed indoor air testing activities at the Altitude Test Facility (ATF) at GE's facility in Evendale, Ohio, in accordance with EPA's January 16, 2014 amendment to EPA's December 19, 2012 approval allowing GE to use the ATF for jet engine testing pursuant to 40 CFR § 761.62(c). This report is being submitted pursuant to Consent Agreement and Final Order (TSCA-05-2014-0008) filed on April 28, 2014.

GE collected two indoor air samples at the ATF on September 8, 2014, following the completion of active jet engine testing in September 2014 and received the laboratory report containing the results on September 22nd, 2014. One sample was "Non-Detect" for PCBs, and the second sample had low but detectable results for PCBs, estimated at 29.6 nanograms per cubic meter (ng/m^3), well below the NIOSH standard of 1,000 ng/m^3. (Note that Non-Detect denote that analytes were not detected at concentrations greater than the laboratory practical quantitation limit - PQL.) Further details for the sampling event follow in the report and **Table 1**.

Air test sample ATF-AR-C43-09, located adjacent to the #43 Test Cell Chamber of the ATF, and air test sample ATF-AR-CR2-15, located on the second floor of the compressor room, were both collected over an 8-hour interval. The samples were collected on September 8, 2014, following the completion of routine jet engine testing activities. Both air pumps were placed in a manner such that the air sample would be collected from the breathing zone, in the room where employees were performing work tasks. Both air pumps used for this event were programmed for a flow rate of 5.0 L/minute for a total run time of eight hours. Calibration and preparation of air samples followed Method TO-10A: Compendium of Methods for Toxic Organic Air Pollution. During the sampling event, a total volume of 2,400 Liters was pumped through each sample collection media.

The laboratory analytical results of the sampling event are provided in the Data Summary Table, attached as **Table 1** and the sampling locations are provided on the attached **Figure 1**. As indicated in the attachments, sample ATF-AR-C43-09 (collected adjacent to Test Cell #43) had "non-detect" levels of PCBs ng/m^3, and sample ATF-AR-CR2-15 (collected from the second floor ATF compressor room) had an estimated detection level of PCBs of 29.6 ng/m^3. The laboratory quantitation limit (PQL) for these results was 41.7 ng/m^3, with a final extraction volume of 5.0 mL. The specific operating parameters of the analytical instruments used by PACE Analytical during sample analysis are detailed in **Attachment 1**.

Please do not hesitate to contact John Rumpf, Counsel for Environmental Affairs at GE Aviation, at (513) 243-4256 or Christopher Bell at Greenberg Traurig LLP at (713) 374-3556 if you have any questions.

Sincerely,

ARCADIS U.S., Inc.

John F. Novotny, PE
Senior Engineer

Attachments
Table 1
Figure 1
Attachment 1

Copies:
John Rumpf, GE
Christopher Bell, Greenberg Traurig, LLP

Table 1
Data Summary - PCB Air Monitoring - September 2014

GE - Aviation - Altitude Test Facility
Cincinnati, Ohio

Sampling ID	Date Collected	Time Collected	Sample Type	Total PCBs (ng/m^3)	Location Description
Event 15					
ATF-AR-C43-09	9/8/2014	15:15	Air	ND	Test Cell 43 open floor area
ATF-AR-CR2-15	9/8/2014	15:20	Air	29.6 J	Second floor of ATF Compressor Room

Notes:

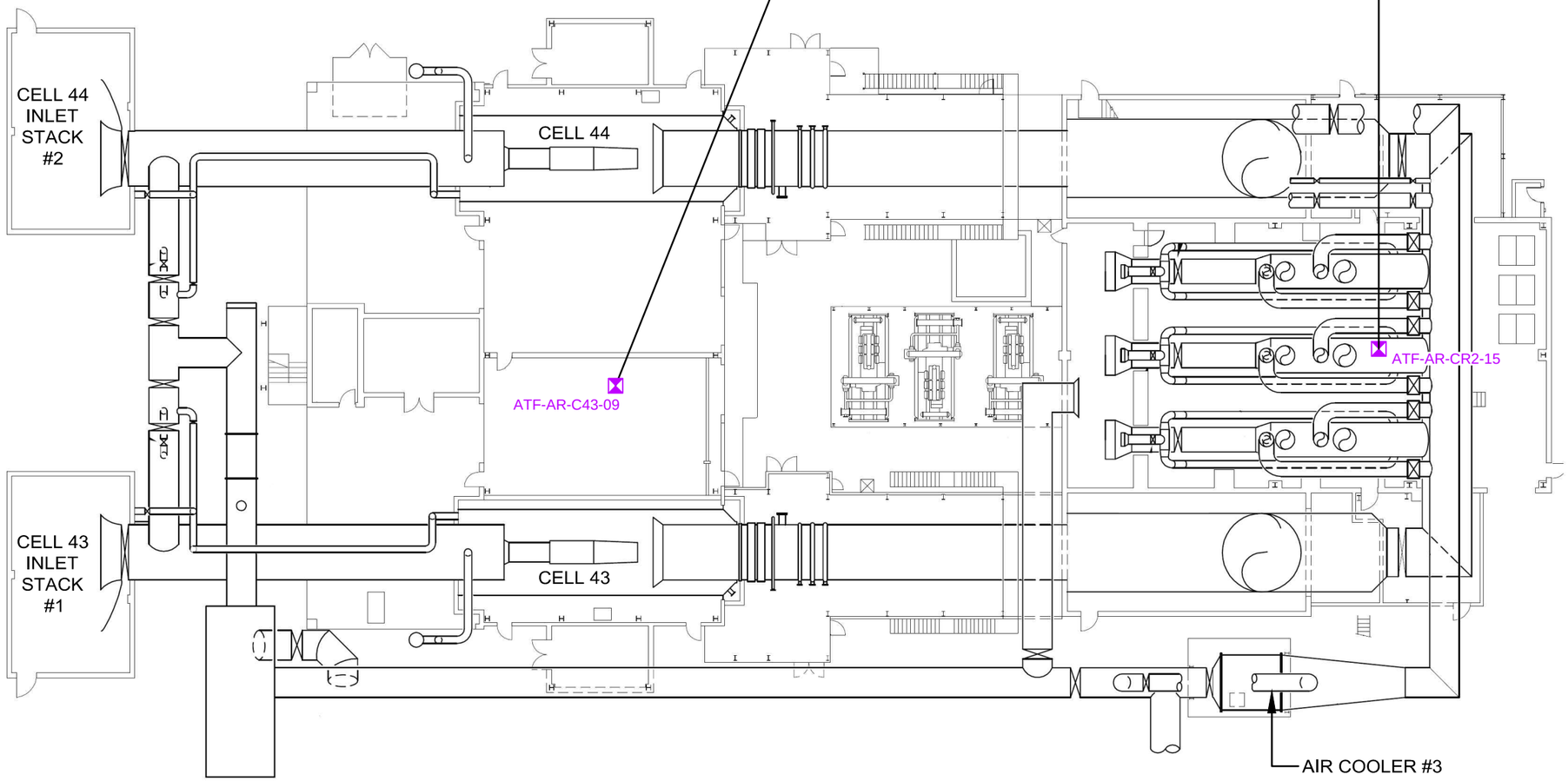
1. Samples collected by ARCADIS personnel and submitted to Pace Analytical Laboratory for analysis using USEPA Compendium Method TO-10A procedures.
2. Air pumps were set up at breathing zone height and operated over an 8-hour interval at an air intake rate of approximately 5 L/min, resulting in approximately 2,400 L of air pulled through the puff for each sample.
3. Event 15 took place at the ATF on September 8, 2014 conducted prior to jet engine testing in September 2014.
4. Total PCBs - the sum of aroclors 1016 through 1268
5. The final extraction volume of 5.0 mL was conducted by the laboratory.
6. The initial injection volume of 1µL was conducted by the laboratory.
7. The Laboratory determined no sample breakthrough occurred on all sample media.
8. ND (Non-Detect) - Denotes analyte not detected at a concentration greater than the MDL
9. PQL (Practical Quantitation Limit) of 41.7 ng/m^3 per aroclor. Denotes lowest analyte concentration reportable for the sample.
10. Time Collected, denotes the time which the air pumps completed the 8-hour run interval.
11. J - Denotes an estimated concentration. The concentration result is greater than or equal to the Method Detection Limit (MDL) but less than the PQL.

Abbreviations:

ATF - Altitude Test Facility
AR - PCB air sample
C43- Test Cell #43
CR2 - compressor room-second floor
PCBs - polychlorinated biphenyls
ng/m^3 - nanograms per cubic meter

ATF–AR–C43–09	
DATE	9/8/2014
TOTAL PCBs (ng/m³)	ND

ATF–AR–CR2–15	
DATE	9/8/2014
TOTAL PCBs (ng/m³)	29.6 J



NOT TO SCALE

LEGEND:

AMBIENT PCB AIR MONITORING LOCATION

SAMPLING NOMENCLATURE:

ATF – ALTITUDE TEST FACILITY

AR – PCB AIR SAMPLE

C43 – TEST CELL #43

CR2 – COMPRESSOR ROOM SECOND FLOOR

NOTES:

1. SAMPLING LOCATIONS ARE APPROXIMATE.
2. ng/m³ – NANOGRAMS PER CUBIC METER
3. TOTAL PCBs – THE SUM OF AROCLORS 1016 THROUGH 1268.
4. J – DENOTES AN ESTIMATED CONCENTRATION. THE CONCENTRATION RESULT IS GREATER THAN OR EQUAL TO THE METHOD DETECTION LIMIT (MDL) BUT LESS THAN THE PQL.

GE-AVIATION
CINCINNATI, OHIO
AIR TEST SUMMARY REPORT

DATA SUMMARY - PCB RESULTS
AMBIENT PCB AIR MONITORING

ARCADIS

FIGURE
1

CITY: SYRACUSE, NY DIV/GROUP: ENVCAD DB: L.POSENAUER LD:(Opt) PIC:(Opt) PM: C.AVERILL TM:(Opt) LYR:(Opt)ON=*;OFF=*REF*
V:\ENVCAD\SYRACUSE\ACTIN\B0031335\2013\RES01\ATSR\31335C11.dwg LAYOUT: 1 SAVED: 9/15/2014 8:51 AM ACADVER: 18.1S (LMS TECH) PAGESETUP: ---- PLOTSTYLETABLE: PLTFULL.CTB PLOTTED: 9/23/2014 12:55 PM BY: POSENAUER, LISA
XREFS: 31335X00 IMAGES: 31335X01.png

GC #: **GC-20 8082 High Level Hydrogen**
Method: **Method 3**
Column: **GC20F ZB-1MS 20M 0.18mm 0.18um**
GC20B ZB-5 20M 0.18mm 0.18um
Date: 7/9/2014
Analyst: JKA
File Name: C:\Users\KELLYH~1.NOR\AppData\Local\Temp\XPgrpwise\[GC20_Parameters_1.xls]8082 HL H2

Sample Delivery: SEE LEAP PARAMETERS

Column Oven:

Step	Temp (°C)	Rate (°C/min)	Hold (min)	Total (min)
Initial	150	-------	1.41	1.41
1	290	17.5	0.65	10.06

Stabilization Time (min): 0.5

Injector: Front CP-1177

1177 Oven Power: ON
1177 Temperature (°C) 300

Time	Split State	Split Ratio
Initial	ON	35

Flow/PSI(Front EFC, Type 1):

Step	Pres (psi)	Rate (psi/min)	Hold (min)	Total (min)
Initial	*	-------	10	10

Constant Flow Mode Enable: NO
Column Flow Rate (ml/min): 1.5

Injector: Middle CP-1177

1177 Oven Power: ON
1177 Temperature (°C) 300

Time	Split State	Split Ratio
Initial	ON	30

Flow/PSI(Front EFC, Type 1):

Step	Pres (psi)	Rate (psi/min)	Hold (min)	Total (min)
Initial	*	-------	10	10

Constant Flow Mode Enable: NO
Column Flow Rate (ml/min): 1.5

Detector: **Front ECD**

ECD Oven Power: ON
Temperature (°C) 300
Electronics: ON
Range: 1

Time	Range	Autozero
Initial	1	YES

ECD Adjustment
Time Constant: Fast
Cell Current: CAP
Contact Potential (mV): *

Middle ECD

ECD Oven Power: ON
Temperature (°C) 300
Electronics: ON
Range: 1

Time	Range	Autozero
Initial	1	YES

Fast
CAP
*

Front ECD Adjustments
Make-up Flow (mL/min) 35

Middle ECD Adjustments
35

Analog Output

Detectors: Front: ECD
Middle: ECD
Rear: None

*values may change with use

Time	Signal Source	Attenuation
Initial	Front Detector	1
Time	Signal Source	Attenuation
Initial	Middle Detector	1
Time	Signal Source	Attenuation
Initial	Rear Detector	1

Valve Table:

Time	1 None	2 None	3 None	4 None	5 None	6 None	7 None
Initial	-----	-----	-----	-----	-----	-----	-----

Initial valve state=Off

6

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ENVIRONMENT

PCB Coordinator
U.S. EPA Region 5
Mailstop LU-9J
77 W. Jackson Blvd
Chicago, IL 60604

Subject:
GE Aviation – Altitude Test Facility
Data Summary of Sixteenth Air Sampling Event – September 2014

Date:
October 7, 2014

Dear PCB Coordinator:

On September 11, 2014, GE Aviation, an operating division of the General Electric Company (GE), performed indoor air testing activities at the Altitude Test Facility (ATF) at GE's facility in Evendale, Ohio, in accordance with EPA's January 16, 2014 amendment to EPA's December 19, 2012 approval allowing GE to use the ATF for jet engine testing pursuant to 40 CFR § 761.62(c). This report is being submitted pursuant to Consent Agreement and Final Order (TSCA-05-2014-0008) filed on April 28, 2014.

GE collected two air samples prior to conducting active jet engine testing at the ATF on September 11, 2014, and received the laboratory report containing the results on September 26, 2014. Both samples were "non-detect" for PCBs. Details on the sampling event follow.

Air test sample ATF-AR-C43-10, located adjacent to the #43 Test Cell Chamber of the ATF, and air test sample ATF-AR-CR2-16, located on the second floor of the compressor room, were both taken over an 8-hour interval. The samples were collected on September 11, 2014, during routine facility maintenance, prior to conducting jet engine testing activities. Calibration and preparation of air samples followed Method T0-10A: Compendium of Methods for Toxic Organic Air Pollution. Both air pumps were placed in a manner such that the air sample would be collected from the breathing zone. During the eight hour sample period, there where employees were performing work tasks near both sample locations. The laboratory analytical results of the sampling event are provided in the Data Summary Table,

attached as **Table 1** and the sampling locations are provided on the attached **Figure 1**. As indicated in the attachments, sample ATF-AR-C43-10 (collected adjacent to Test Cell #43) had non-detected (ND) PCBs, and sample ATF-AR-CR2-16 (collected from the ATF compressor room) had non-detected (ND) PCBs. The laboratory quantitation limit (PQL) for these results was 41.7 ng/m^3, with a final extraction volume of 5.0 mL. The specific operating parameters of the analytical instruments used by PACE Analytical during sample analysis are detailed in **Attachment 1**.

Please do not hesitate to contact John Rumpf, Counsel for Environmental Affairs at GE Aviation, at (513) 243-4256 or Christopher Bell at Greenberg Traurig LLP at (713) 374-3556 if you have any questions.

Sincerely,

ARCADIS of New York, Inc.

John F. Novotny, PE
Senior Engineer

Attachments
Table 1
Figure 1
Attachment 1

Copies:
John Rumpf, GE
Christopher Bell, Greenberg Traurig, LLP

Table 1
Data Summary - PCB Air Monitoring - September 2014

GE - Aviation - Altitude Test Facility
Cincinnati, Ohio

Sampling ID	Date Collected	Time Collected	Sample Type	Total PCBs (ng/m^3)	Location Description
Event 16					
ATF-AR-C43-10	9/11/2014	15:30	Air	ND	Test Cell 43 open floor area
ATF-AR-CR2-16	9/11/2014	15:35	Air	ND	Second floor of ATF Compressor Room

Notes:

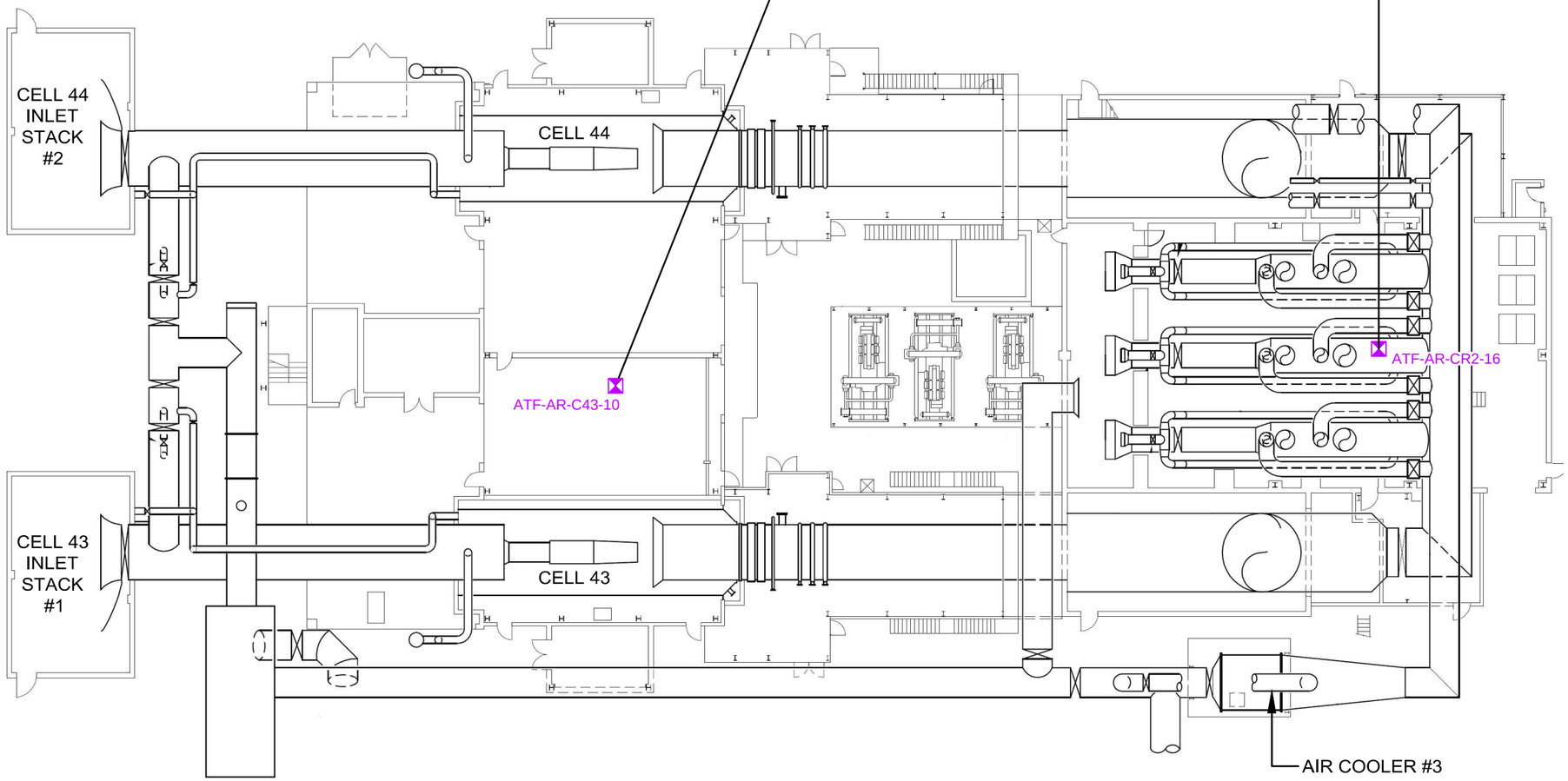
1. Samples collected by ARCADIS personnel and submitted to Pace Analytical Laboratory for analysis using USEPA Compendium Method TO-10A procedures.
2. Air pumps were set up at breathing zone height and operated over an 8-hour interval at an air intake rate of approximately 5 L/min, resulting in approximately 2,400 L of air pulled through the puff for each sample.
3. Event 16 took place at the ATF on September 11, 2014, sampling conducted prior to active jet engine testing in September 2014.
4. Total PCBs - the sum of aroclors 1016 through 1268
5. The final extraction volume of 5.0 mL was conducted by the laboratory.
6. The initial injection volume of 1µL was conducted by the laboratory.
7. The Laboratory determined no sample breakthrough occurred on all sample media.
8. ND (Non-Detect) - Denotes analyte not detected at a concentration greater than the MDL
9. PQL (Practical Quantitation Limit) of 41.7 ng/m^3 per aroclor. Denotes lowest analyte concentration reportable for the sample.
10. Time Collected, denotes the time which the air pumps completed the 8-hour run interval.

Abbreviations:

ATF - Altitude Test Facility
AR - PCB air sample
C43 - Test Cell #43
CR2 - compressor room-second floor
PCBs - polychlorinated biphenyls
ng/m^3 - nanograms per cubic meter

ATF–AR–C43–10	
DATE	9/11/2014
TOTAL PCBs (ng/m³)	ND

ATF–AR–CR2–16	
DATE	9/11/2014
TOTAL PCBs (ng/m³)	ND



NOT TO SCALE

LEGEND:

AMBIENT PCB AIR MONITORING LOCATION

SAMPLING NOMENCLATURE:

ATF – ALTITUDE TEST FACILITY

AR – PCB AIR SAMPLE

C43 – TEST CELL #43

CR2 – COMPRESSOR ROOM SECOND FLOOR

NOTES:

1. SAMPLING LOCATIONS ARE APPROXIMATE.
2. ng/m³ – NANOGRAMS PER CUBIC METER
3. TOTAL PCBs – THE SUM OF AROCLORS 1016 THROUGH 1268.
4. J – DENOTES AN ESTIMATED CONCENTRATION. THE CONCENTRATION RESULT IS GREATER THAN OR EQUAL TO THE METHOD DETECTION LIMIT (MDL) BUT LESS THAN THE PQL.

GE-AVIATION
CINCINNATI, OHIO
AIR TEST SUMMARY REPORT

DATA SUMMARY - PCB RESULTS
AMBIENT PCB AIR MONITORING

ARCADIS

FIGURE
1

CITY: SYRACUSE, NY DIV/GROUP: ENVCAD DB: L.POSENAUER LD:(Opt) PIC:(Opt) PM: C.AVERILL TM:(Opt) LYR:(Opt)ON=*;OFF=*REF*
V:\ENVCAD\SYRACUSE\ACTIN\B0031335\2013\RES01\ATSR\31335C13.dwg LAYOUT: 1 SAVED: 10/2/2014 1:13 PM ACADVER: 18.1S (LMS TECH) PAGESETUP: ---- PLOTSTYLETABLE: PLTFULL.CTB PLOTTED: 10/6/2014 8:38 AM BY: POSENAUER, LISA
XREFS: 31335X00 IMAGES: 31335X01.png

GC #: **GC-20 8082 High Level Hydrogen**
Method: **Method 3**
Column: **GC20F ZB-1MS 20M 0.18mm 0.18um**
GC20B ZB-5 20M 0.18mm 0.18um
Date: 7/9/2014
Analyst: JKA
File Name: C:\Users\KELLYH~1.NOR\AppData\Local\Temp\XPgrpwise\[GC20_Parameters_1.xls]8082 HL H2

Sample Delivery: SEE LEAP PARAMETERS

Column Oven:

Step	Temp (°C)	Rate (°C/min)	Hold (min)	Total (min)
Initial	150	-------	1.41	1.41
1	290	17.5	0.65	10.06

Stabilization Time (min): 0.5

Injector: Front CP-1177

1177 Oven Power: ON
1177 Temperature (°C) 300

Time	Split State	Split Ratio
Initial	ON	35

Flow/PSI(Front EFC, Type 1):

Step	Pres (psi)	Rate (psi/min)	Hold (min)	Total (min)
Initial	*	-------	10	10

Constant Flow Mode Enable: NO
Column Flow Rate (ml/min): 1.5

Injector: Middle CP-1177

1177 Oven Power: ON
1177 Temperature (°C) 300

Time	Split State	Split Ratio
Initial	ON	30

Flow/PSI(Front EFC, Type 1):

Step	Pres (psi)	Rate (psi/min)	Hold (min)	Total (min)
Initial	*	-------	10	10

Constant Flow Mode Enable: NO
Column Flow Rate (ml/min): 1.5

Detector: **Front ECD**

ECD Oven Power: ON
Temperature (°C) 300
Electronics: ON
Range: 1

Time	Range	Autozero
Initial	1	YES

ECD Adjustment
Time Constant: Fast
Cell Current: CAP
Contact Potential (mV): *

Middle ECD

ECD Oven Power: ON
Temperature (°C) 300
Electronics: ON
Range: 1

Time	Range	Autozero
Initial	1	YES

Fast
CAP
*

Front ECD Adjustments
Make-up Flow (mL/min) 35

Middle ECD Adjustments
35

Analog Output

Detectors: Front: ECD
Middle: ECD
Rear: None

*values may change with use

Time	Signal Source	Attenuation
Initial	Front Detector	1
Time	Signal Source	Attenuation
Initial	Middle Detector	1
Time	Signal Source	Attenuation
Initial	Rear Detector	1

Valve Table:

Time	1 None	2 None	3 None	4 None	5 None	6 None	7 None
Initial	-----	-----	-----	-----	-----	-----	-----

Initial valve state=Off

6

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www.arcadis-us.com

ENVIRONMENT

PCB Coordinator
U.S. EPA Region 5
Mailstop LU-9J
77 W. Jackson Blvd
Chicago, IL 60604

Subject:
GE Aviation – Altitude Test Facility
Data Summary of Seventeenth Air Sampling Event – September 2014

Date:
October 8, 2014

Dear PCB Coordinator:

On September 17, 2014, GE Aviation, an operating division of the General Electric Company (GE), performed indoor air testing activities at the Altitude Test Facility (ATF) at GE's facility in Evendale, Ohio, in accordance with EPA's January 16, 2014 amendment to EPA's December 19, 2012 approval allowing GE to use the ATF for jet engine testing pursuant to 40 CFR § 761.62(c). This report is being submitted pursuant to Consent Agreement and Final Order (TSCA-05-2014-0008) filed on April 28, 2014.

GE collected two air samples during active jet engine testing at the ATF on September 17, 2014, and received the laboratory report containing the results on September 26, 2014. Both samples were "non-detect" for PCBs. Details on the sampling event follow.

Air test sample ATF-AR-C43-11, located adjacent to the #43 Test Cell Chamber of the ATF, and air test sample ATF-AR-CR2-17, located on the second floor of the compressor room, were both taken over an 8-hour interval. The samples were collected on September 17, 2014, during active engine testing conducted by GE at the ATF. Calibration and preparation of air samples followed Method T0-10A: Compendium of Methods for Toxic Organic Air Pollution. Both air pumps were placed in a manner such that the air sample would be collected from the breathing zone. During the eight hour sample period, there was approximately five hours of engine run time. The laboratory analytical results of the sampling event are provided in the Data Summary Table, attached as **Table 1** and the sampling locations are provided

on the attached **Figure 1**. As indicated in the attachments, sample ATF-AR-C43-11 (collected adjacent to Test Cell #43) had non-detected (ND) PCBs, and sample ATF-AR-CR2-17 (collected from the ATF compressor room) had non-detected (ND) PCBs. The laboratory quantitation limit (PQL) for these results was 41.7 ng/m^3, with a final extraction volume of 5.0 mL. The specific operating parameters of the analytical instruments used by PACE Analytical during sample analysis are detailed in **Attachment 1**.

Please do not hesitate to contact John Rumpf, Counsel for Environmental Affairs at GE Aviation, at (513) 243-4256 or Christopher Bell at Greenberg Traurig LLP at (713) 374-3556 if you have any questions.

Sincerely,

ARCADIS of New York, Inc.

John F. Novotny, PE
Senior Engineer

Attachments
Table 1
Figure 1
Attachment 1

Copies:
John Rumpf, GE
Christopher Bell, Greenberg Traurig, LLP

Table 1
Data Summary - PCB Air Monitoring - September 2014

GE - Aviation - Altitude Test Facility
Cincinnati, Ohio

Sampling ID	Date Collected	Time Collected	Sample Type	Total PCBs (ng/m^3)	Location Description
Event 17					
ATF-AR-C43-11	9/17/2014	15:15	Air	ND	Test Cell 43 open floor area
ATF-AR-CR2-17	9/17/2014	15:25	Air	ND	Second floor of ATF Compressor Room

Notes:

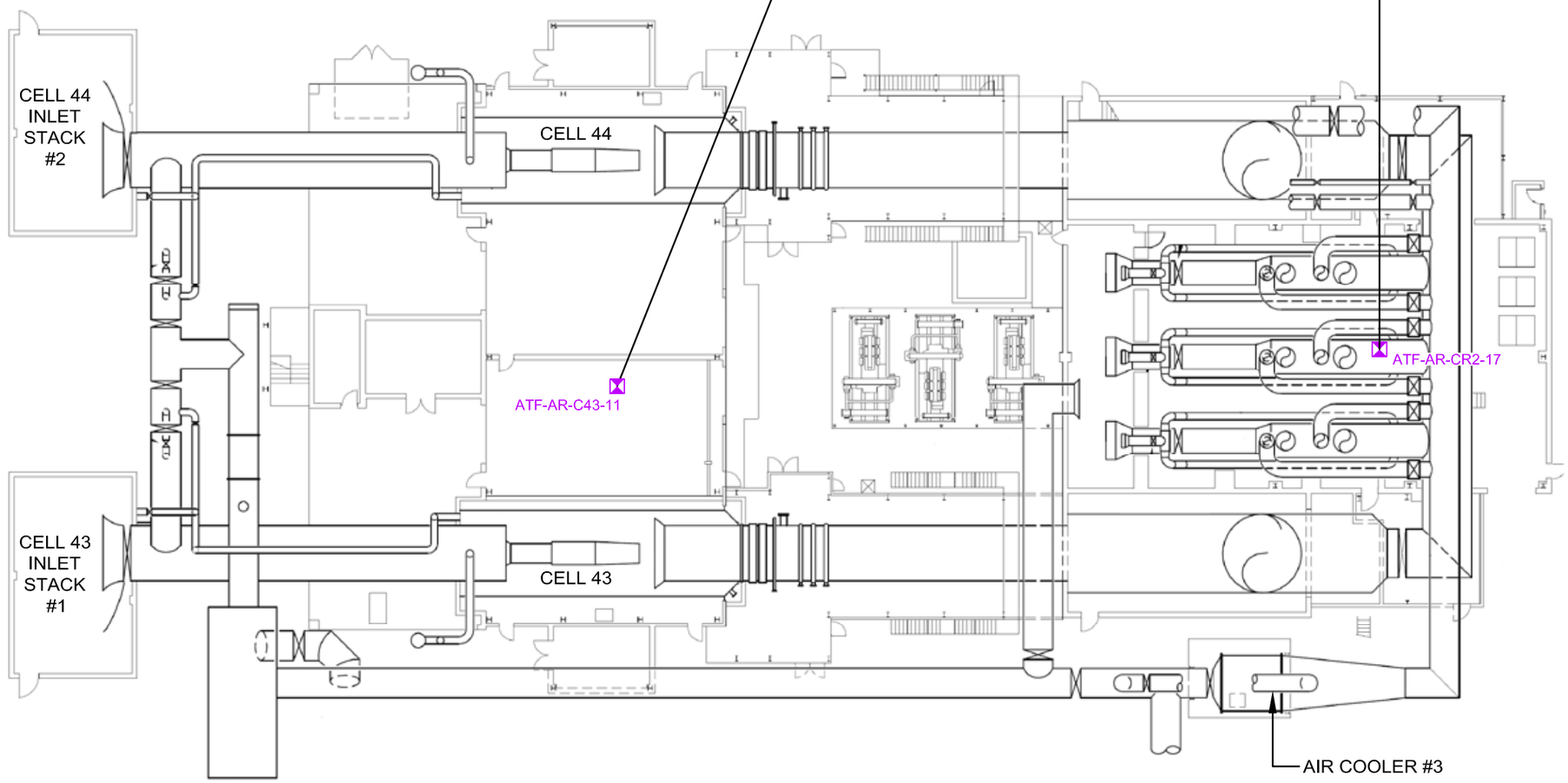
1. Samples collected by ARCADIS personnel and submitted to Pace Analytical Laboratory for analysis using USEPA Compendium Method TO-10A procedures.
2. Air pumps were set up at breathing zone height and operated over an 8-hour interval at an air intake rate of approximately 5 L/min, resulting in approximately 2,400 L of air pulled through the puff for each sample.
3. Event 17 took place at the ATF on September 17, 2014 conducting during active jet engine testing in September 2014.
4. Total PCBs - the sum of aroclors 1016 through 1268
5. The final extraction volume of 5.0 mL was conducted by the laboratory.
6. The initial injection volume of 1µL was conducted by the laboratory.
7. The Laboratory determined no sample breakthrough occurred on all sample media.
8. ND (Non-Detect) - Denotes analyte not detected at a concentration greater than the MDL
9. PQL (Practical Quantitation Limit) of 41.7 ng/m^3 per aroclor. Denotes lowest analyte concentration reportable for the sample.
10. Time Collected, denotes the time which the air pumps completed the 8-hour run interval.

Abbreviations:

ATF - Altitude Test Facility
AR - PCB air sample
C43 - Test Cell #43
CR2 - compressor room-second floor
PCBs - polychlorinated biphenyls
ng/m^3 - nanograms per cubic meter

ATF–AR–C43–11	
DATE	9/17/2014
TOTAL PCBs (ng/m³)	ND

ATF–AR–CR2–17	
DATE	9/17/2014
TOTAL PCBs (ng/m³)	ND



NOT TO SCALE

LEGEND:

AMBIENT PCB AIR MONITORING LOCATION

SAMPLING NOMENCLATURE:

ATF – ALTITUDE TEST FACILITY

AR – PCB AIR SAMPLE

C43 – TEST CELL #43

CR2 – COMPRESSOR ROOM SECOND FLOOR

NOTES:

1. SAMPLING LOCATIONS ARE APPROXIMATE.
2. ng/m³ – NANOGRAMS PER CUBIC METER
3. TOTAL PCBs – THE SUM OF AROCLORS 1016 THROUGH 1268.
4. J – DENOTES AN ESTIMATED CONCENTRATION. THE CONCENTRATION RESULT IS GREATER THAN OR EQUAL TO THE METHOD DETECTION LIMIT (MDL) BUT LESS THAN THE PQL.

GE-AVIATION
CINCINNATI, OHIO
AIR TEST SUMMARY REPORT

DATA SUMMARY - PCB RESULTS
AMBIENT PCB AIR MONITORING

ARCADIS

FIGURE
1

CITY: SYRACUSE, NY DIV/GROUP: ENVCAD DB: L.POSENAUER LD:(Opt) PIC:(Opt) PM: C.AVERILL TM:(Opt) LYR:(Opt)ON=*;OFF=*REF*
V:\ENVCAD\SYRACUSE\ACTIN\B0031335\2013\RES01\ATSR\31335C12.dwg LAYOUT: 1 SAVED: 10/2/2014 1:13 PM ACADVER: 18.1S (LMS TECH) PAGESETUP: ---- PLOTSTYLETABLE: PLTFULL.CTB PLOTTED: 10/2/2014 1:13 PM BY: POSENAUER, LISA
XREFS: 31335X00 IMAGES: 31335X01.png

GC #: **GC-20 8082 High Level Hydrogen**
Method: **Method 3**
Column: **GC20F ZB-1MS 20M 0.18mm 0.18um**
GC20B ZB-5 20M 0.18mm 0.18um
Date: 7/9/2014
Analyst: JKA
File Name: C:\Users\KELLYH~1.NOR\AppData\Local\Temp\XPgrpwise\[GC20_Parameters_1.xls]8082 HL H2

Sample Delivery: SEE LEAP PARAMETERS

Column Oven:

Step	Temp (°C)	Rate (°C/min)	Hold (min)	Total (min)
Initial	150	-------	1.41	1.41
1	290	17.5	0.65	10.06

Stabilization Time (min): 0.5

Injector: Front CP-1177

1177 Oven Power: ON
1177 Temperature (°C) 300

Time	Split State	Split Ratio
Initial	ON	35

Flow/PSI(Front EFC, Type 1):

Step	Pres (psi)	Rate (psi/min)	Hold (min)	Total (min)
Initial	*	-------	10	10

Constant Flow Mode Enable: NO
Column Flow Rate (ml/min): 1.5

Injector: Middle CP-1177

1177 Oven Power: ON
1177 Temperature (°C) 300

Time	Split State	Split Ratio
Initial	ON	30

Flow/PSI(Front EFC, Type 1):

Step	Pres (psi)	Rate (psi/min)	Hold (min)	Total (min)
Initial	*	-------	10	10

Constant Flow Mode Enable: NO
Column Flow Rate (ml/min): 1.5

Detector: **Front ECD**

ECD Oven Power: ON
Temperature (°C) 300
Electronics: ON
Range: 1

Time	Range	Autozero
Initial	1	YES

ECD Adjustment
Time Constant: Fast
Cell Current: CAP
Contact Potential (mV): *

Middle ECD

ECD Oven Power: ON
Temperature (°C) 300
Electronics: ON
Range: 1

Time	Range	Autozero
Initial	1	YES

Fast
CAP
*

Front ECD Adjustments
Make-up Flow (mL/min) 35

Middle ECD Adjustments
35

Analog Output

Detectors: Front: ECD
Middle: ECD
Rear: None

*values may change with use

Time	Signal Source	Attenuation
Initial	Front Detector	1
Time	Signal Source	Attenuation
Initial	Middle Detector	1
Time	Signal Source	Attenuation
Initial	Rear Detector	1

Valve Table:

Time	1 None	2 None	3 None	4 None	5 None	6 None	7 None
Initial	-----	-----	-----	-----	-----	-----	-----

Initial valve state=Off

6

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ENVIRONMENT

PCB Coordinator
U.S. EPA Region 5
Mailstop LU-9J
77 W. Jackson Blvd
Chicago, IL 60604

Subject:
GE Aviation – Altitude Test Facility
Data Summary of Eighteenth Air Sampling Event – September 2014

Date:
October 15, 2014

Dear PCB Coordinator:

On September 24, 2014, GE Aviation, an operating division of the General Electric Company (GE), performed indoor air testing activities at the Altitude Test Facility (ATF) at GE's facility in Evendale, Ohio, in accordance with EPA's January 16, 2014 amendment to EPA's December 19, 2012 approval allowing GE to use the ATF for jet engine testing pursuant to 40 CFR § 761.62(c). This report is being submitted pursuant to Consent Agreement and Final Order (TSCA-05-2014-0008) filed on April 28, 2014.

GE collected two air samples following the completion of active jet engine testing at the ATF on September 24, 2014, and received the laboratory report containing the results on October 9, 2014. Both samples were "non-detect" for PCBs. Details on the sampling event follow.

Air test sample ATF-AR-C43-12, located adjacent to the #43 Test Cell Chamber of the ATF, and air test sample ATF-AR-CR2-18, located on the second floor of the compressor room, were both taken over an 8-hour interval. The samples were collected on September 24, 2014, following the completion of active jet engine testing at the ATF. Calibration and preparation of the air samples followed Method TO-10A: Compendium of Methods for Toxic Organic Air Pollution. Both air pumps were placed in a manner such that the air sample would be collected from the breathing zone. The laboratory analytical results of the sampling event are provided in the Data Summary Table, attached as Table 1 and the sampling locations are provided on the attached Figure 1. As indicated in the attachments, sample ATF-AR-

C43-12 (collected adjacent to Test Cell #43) was non-detected (ND) for PCBs, and sample ATF-AR-CR2-18 (collected from the second floor of the ATF compressor room) had non-detected (ND) PCBs. The laboratory quantitation limit (PQL) for these results was 41.7 ng/m^3, with a final extraction volume of 5.0 mL. The specific operating parameters of the analytical instruments used by PACE Analytical during sample analysis are detailed in Attachment 1.

Please do not hesitate to contact John Rumpf, Counsel for Environmental Affairs at GE Aviation, at (513) 243-4256 or Christopher Bell at Greenberg Traurig LLP at (713) 374-3556 if you have any questions.

Sincerely,

ARCADIS of New York, Inc.

John F. Novotny, PE
Senior Engineer

Attachments
Table 1
Figure 1
Attachment 1

Copies:
John Rumpf, GE
Christopher Bell, Greenberg Traurig, LLP

Table 1
Data Summary - PCB Air Monitoring -September 2014

GE - Aviation - Altitude Test Facility
Cincinnati, Ohio

Sampling ID	Date Collected	Time Collected	Sample Type	Total PCBs (ng/m^3)	Location Description
Event 18					
ATF-AR-C43-12	9/24/2014	15:45	Air	ND	Test Cell 43 open floor area
ATF-AR-CR2-18	9/24/2014	15:40	Air	ND	Second floor of ATF Compressor Room

Notes:

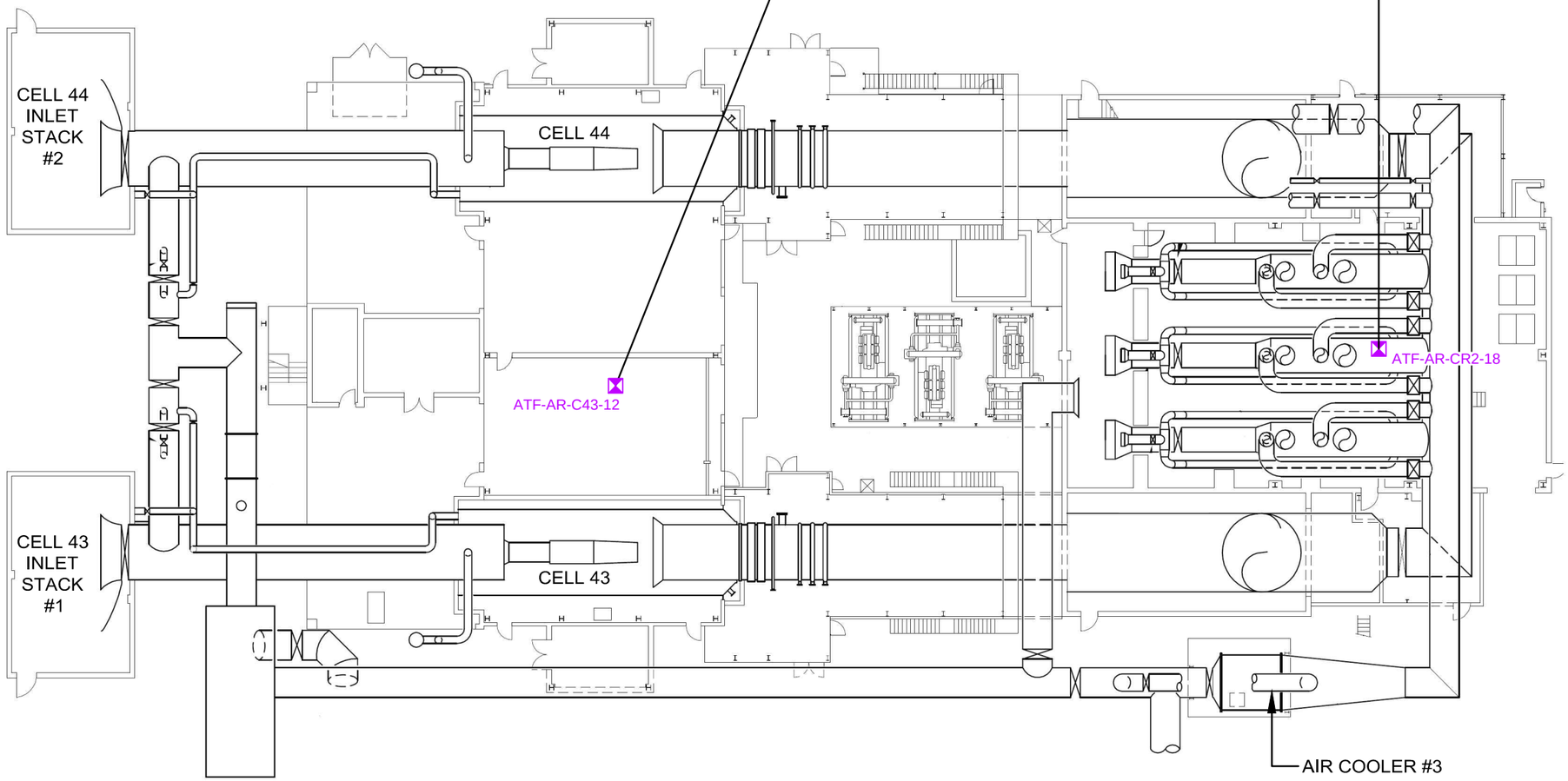
1. Samples collected by ARCADIS personnel and submitted to Pace Analytical Laboratory for analysis using USEPA Compendium Method TO-10A procedures.
2. Air pumps were set up at breathing zone height and operated over an 8-hour interval at an air intake rate of approximately 5 L/min, resulting in approximately 2,400 L of air pulled through the puff for each sample.
3. Event 18 took place at the ATF on September 24, 2014 conducted following active jet engine testing in September 2014.
4. Total PCBs - the sum of aroclors 1016 through 1268
5. The final extraction volume of 5.0 mL was conducted by the laboratory.
6. The initial injection volume of 1µL was conducted by the laboratory.
7. the Laboratory determined no sample breakthrough occurred on all sample media.
8. ND (Non-Detect) - Denotes analyte not detected at a concentration greater than the MDL
9. PQL (Practical Quantitation Limit) of 41.7 ng/m^3 per aroclor. Denotes lowest analyte concentration reportable for the sample.
10. Time Collected, denotes the time which the air pumps completed the 8-hour run interval.

Abbreviations:

ATF - Altitude Test Facility
AR - PCB air sample
C43 - Test Cell #43
CR2 - compressor room-second floor
PCBs - polychlorinated biphenyls
ng/m^3 - nanograms per cubic meter

ATF–AR–C43–12	
DATE	9/24/2014
TOTAL PCBs (ng/m³)	ND

ATF–AR–CR2–18	
DATE	9/24/2014
TOTAL PCBs (ng/m³)	ND



NOT TO SCALE

LEGEND:

AMBIENT PCB AIR MONITORING LOCATION

SAMPLING NOMENCLATURE:

ATF – ALTITUDE TEST FACILITY

AR – PCB AIR SAMPLE

C43 – TEST CELL #43

CR2 – COMPRESSOR ROOM SECOND FLOOR

NOTES:

1. SAMPLING LOCATIONS ARE APPROXIMATE.
2. ng/m³ – NANOGRAMS PER CUBIC METER
3. TOTAL PCBs – THE SUM OF AROCLORS 1016 THROUGH 1268.
4. J – DENOTES AN ESTIMATED CONCENTRATION. THE CONCENTRATION RESULT IS GREATER THAN OR EQUAL TO THE METHOD DETECTION LIMIT (MDL) BUT LESS THAN THE PQL.

GE-AVIATION
CINCINNATI, OHIO
AIR TEST SUMMARY REPORT

DATA SUMMARY - PCB RESULTS
AMBIENT PCB AIR MONITORING

ARCADIS

FIGURE
1

CITY: SYRACUSE, NY DIV/GROUP: ENVCAD DB: L.POSENAUER LD:(Opt) PIC:(Opt) PM: C.AVERILL TM:(Opt) LYR:(Opt)ON=*;OFF=*REF*
V:\ENVCAD\SYRACUSE\ACTIN\B0031335\2013\RES01\ATSR\31335C14.dwg LAYOUT: 1 SAVED: 10/10/2014 8:39 AM ACADVER: 18.1S (LMS TECH) PAGESETUP: ---- PLOTSTYLETABLE: PLTFULL.CTB PLOTTED: 10/10/2014 8:39 AM BY: POSENAUER, LISA
XREFS: 31335X00 IMAGES: 31335X01.png

GC #: **GC-21 8082 High Level Method HYDROGEN**
Method: **Method 3**
Column: **GC21F ZB-1MS 20M 0.18mm 0.18um**
GC21B ZB-5 20M 0.18mm 0.18um
Date: 2/15/2013
Analyst: JKA
File Name: C:\Users\KELLYH~1.NOR\AppData\Local\Temp\XPgrpwise\[GC21_Parameters_1.xls]8082 H2 HL

Sample Delivery: SEE LEAP PARAMETERS

Column Oven:

Step	Temp (°C)	Rate (°C/min)	Hold (min)	Total (min)
Initial	150	-------	1.41	1.41
1	290	17.5	0.65	10.06

Stabilization Time (min): 0.50

Injector: **Front CP-1177**

1177 Oven Power: ON
1177 Temperature (°C) 300

Time	Split State	Split Ratio
Initial	ON	35

Flow/PSI(Front_EFC, Type 1):
Carrier Gas : Helium

Step	Pres (psi)	Rate (psi/min)	Hold (min)	Total (min)
Initial	*	-------	10	10

Constant Flow Mode Enable: NO
Column Flow Rate (ml/min): 2.3

Injector: **Middle CP-1177**

1177 Oven Power: ON
1177 Temperature (°C) 300

Time	Split State	Split Ratio
Initial	ON	35

Flow/PSI(Front_EFC, Type 1):

Step	Pres (psi)	Rate (psi/min)	Hold (min)	Total (min)
Initial	*	-------	10	10

Constant Flow Mode Enable: NO
Column Flow Rate (ml/min): 2.6

Detector: **Front ECD**

ECD Oven Power: ON
Temperature (°C) 300
Electronics: ON
Range: 1

Time	Range	Autozero
Initial	1	YES

Front ECD Adjustment
Time Constant: Fast
Cell Current: CAP
Contact Potential (mV): *

Middle ECD

ECD Oven Power: ON
Temperature (°C) 300
Electronics: ON
Range: 1

Time	Range	Autozero
Initial	1	YES

Fast
CAP
*

*values may change with use

Front ECD Adjustments
Make-up Flow (mL/min) 30

Middle ECD Adjustments
Make-up Flow (mL/min) 35

Analog Output

Detectors: Front: ECD Attenuation 1
Middle: ECD Attenuation 1
Rear: None

Time	Signal Source	Attenuation
Initial	Front Detector	1
Time	Signal Source	Attenuation
Initial	Middle Detector	1
Time	Signal Source	Attenuation
Initial	Rear Detector	1

Valve Table:

Time	1 None	2 None	3 None	4 None	5 None	6 None	7 None
Initial	-----	-----	-----	-----	-----	-----	-----

Initial valve state=Off

6

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Fax 315 449 0017
www.arcadis-us.com

ENVIRONMENT

PCB Coordinator
U.S. EPA Region 5
Mailstop LU-9J
77 W. Jackson Blvd
Chicago, IL 60604

Subject:
GE Aviation – Altitude Test Facility
Data Summary of Nineteenth Air Sampling Event – October 2014

Date:
November 6, 2014

Dear PCB Coordinator:

On October 10, 2014, GE Aviation, an operating division of the General Electric Company (GE), performed indoor air testing activities at the Altitude Test Facility (ATF) at GE's facility in Evendale, Ohio, in accordance with EPA's January 16, 2014 amendment to EPA's December 19, 2012 approval allowing GE to use the ATF for jet engine testing pursuant to 40 CFR § 761.62(c). This report is being submitted pursuant to Consent Agreement and Final Order (TSCA-05-2014-0008) filed on April 28, 2014.

GE collected two air samples prior to conducting active jet engine testing at the ATF on October 10, 2014, and received the laboratory report containing the results on October 27, 2014. Both samples were "non-detect" for PCBs. Details on the sampling event follow.

Air test sample ATF-AR-C43-13, located adjacent to the #43 Test Cell Chamber of the ATF, and air test sample ATF-AR-CR2-19, located on the second floor of the compressor room, were both taken over an 8-hour interval. The samples were collected on October 10, 2014, prior to conducting active jet engine testing at the ATF. Calibration and preparation of the air samples followed Method TO-10A: Compendium of Methods for Toxic Organic Air Pollution. Both air pumps were placed in a manner such that the air sample would be collected from the breathing zone. The laboratory analytical results of the sampling event are provided in the Data Summary Table, attached as Table 1 and the sampling locations are provided on the attached Figure 1. As indicated in the attachments, sample ATF-AR-C43-13

(collected adjacent to Test Cell #43) was non-detected (ND) for PCBs, and sample ATF-AR-CR2-19 (collected from the second floor of the ATF compressor room) had non-detected (ND) PCBs. The laboratory quantitation limit (PQL) for these results was 41.7 ng/m^3, with a final extraction volume of 5.0 mL. The specific operating parameters of the analytical instruments used by PACE Analytical during sample analysis are detailed in Attachment 1.

Please do not hesitate to contact John Rumpf, Counsel for Environmental Affairs at GE Aviation, at (513) 243-4256 or Christopher Bell at Greenberg Traurig LLP at (713) 374-3556 if you have any questions.

Sincerely,

ARCADIS of New York, Inc.

John F. Novotny, PE
Senior Engineer

Attachments
Table 1
Figure 1
Attachment 1

Copies:
John Rumpf, GE
Christopher Bell, Greenberg Traurig, LLP

Table 1
Data Summary - PCB Air Monitoring – October 2014

GE - Aviation - Altitude Test Facility
Cincinnati, Ohio

Sampling ID	Date Collected	Time Collected	Sample Type	Total PCBs (ng/m^3)	Location Description
Event 19					
ATF-AR-C43-13	10/10/2014	14:45	Air	ND	Test Cell 43 open floor area
ATF-AR-CR2-19	10/10/2014	14:50	Air	ND	Second floor of ATF Compressor Room

Notes:

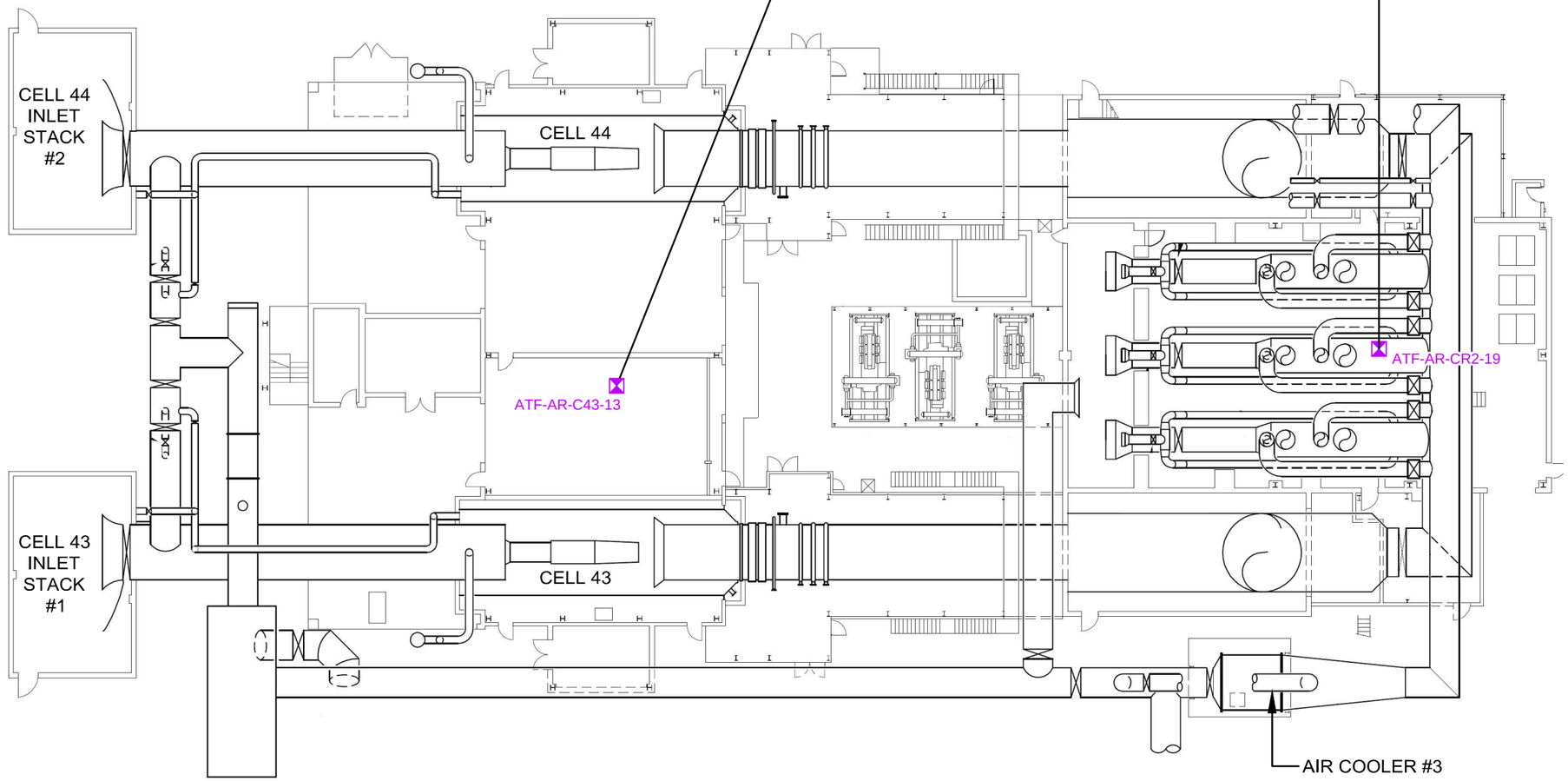
1. Samples collected by ARCADIS personnel and submitted to Pace Analytical Laboratory for analysis using USEPA Compendium Method TO-10A procedures.
2. Air pumps were set up at breathing zone height and operated over an 8-hour interval at an air intake rate of approximately 5 L/min, resulting in approximately 2,400 L of air pulled through the puff for each sample.
3. Event 19 took place at the ATF on October 10, 2014 conducted prior to active jet engine testing in October 2014.
4. Total PCBs - the sum of aroclors 1016 through 1268
5. The final extraction volume of 5.0 mL was conducted by the laboratory.
6. The initial injection volume of 1µL was conducted by the laboratory.
7. the Laboratory determined no sample breakthrough occurred on all sample media.
8. ND (Non-Detect) - Denotes analyte not detected at a concentration greater than the MDL
9. PQL (Practical Quantitation Limit) of 41.7 ng/m^3 per aroclor. Denotes lowest analyte concentration reportable for the sample.
10. Time Collected, denotes the time which the air pumps completed the 8-hour run interval.

Abbreviations:

ATF - Altitude Test Facility
AR - PCB air sample
C43 - Test Cell #43
CR2 - compressor room-second floor
PCBs - polychlorinated biphenyls
ng/m^3 - nanograms per cubic meter

ATF–AR–C43–13	
DATE	10/10/2014
TOTAL PCBs (ng/m³)	ND

ATF–AR–CR2–19	
DATE	10/10/2014
TOTAL PCBs (ng/m³)	ND



NOT TO SCALE

LEGEND:

AMBIENT PCB AIR MONITORING LOCATION

SAMPLING NOMENCLATURE:

ATF – ALTITUDE TEST FACILITY

AR – PCB AIR SAMPLE

C43 – TEST CELL #43

CR2 – COMPRESSOR ROOM SECOND FLOOR

NOTES:

1. SAMPLING LOCATIONS ARE APPROXIMATE.
2. ng/m³ – NANOGRAMS PER CUBIC METER
3. TOTAL PCBs – THE SUM OF AROCLORS 1016 THROUGH 1268.
4. J – DENOTES AN ESTIMATED CONCENTRATION. THE CONCENTRATION RESULT IS GREATER THAN OR EQUAL TO THE METHOD DETECTION LIMIT (MDL) BUT LESS THAN THE PQL.

GE-AVIATION
CINCINNATI, OHIO
AIR TEST SUMMARY REPORT

DATA SUMMARY - PCB RESULTS
AMBIENT PCB AIR MONITORING

ARCADIS

FIGURE
1

CITY: SYRACUSE, NY DIV/GROUP: ENVCAD DB: L.POSENAUER LD:(Opt) PIC:(Opt) PM: C.AVERILL TM:(Opt) LYR:(Opt)ON=*;OFF=*REF*
V:\ENVCAD\SYRACUSE\ACTIN\B0031335\2013\RES01\ATSR\31335C15.dwg LAYOUT: 1 SAVED: 10/30/2014 10:49 AM ACADVER: 18.1S (LMS TECH) PAGESETUP: ---- PLOTSTYLETABLE: PLTFULL.CTB PLOTTED: 10/30/2014 10:49 AM BY: POSENAUER, LISA
XREFS: 31335X00 IMAGES: 31335X01.png

GC #: **GC-21 8082 High Level Method HYDROGEN**
Method: **Method 3**
Column: **GC21F ZB-1MS 20M 0.18mm 0.18um**
GC21B ZB-5 20M 0.18mm 0.18um
Date: 2/15/2013
Analyst: JKA
File Name: C:\Users\KELLYH~1.NOR\AppData\Local\Temp\XPgrpwise\[GC21_Parameters_1.xls]8082 H2 HL

Sample Delivery: SEE LEAP PARAMETERS

Column Oven:

Step	Temp (°C)	Rate (°C/min)	Hold (min)	Total (min)
Initial	150	-------	1.41	1.41
1	290	17.5	0.65	10.06

Stabilization Time (min): 0.50

Injector: **Front CP-1177**

1177 Oven Power: ON
1177 Temperature (°C) 300

Time	Split State	Split Ratio
Initial	ON	35

Injector: **Middle CP-1177**

1177 Oven Power: ON
1177 Temperature (°C) 300

Time	Split State	Split Ratio
Initial	ON	35

Flow/PSI(Front_EFC, Type 1):
Carrier Gas : Helium

Step	Pres (psi)	Rate (psi/min)	Hold (min)	Total (min)
Initial	*	-------	10	10

Constant Flow Mode Enable: NO
Column Flow Rate (ml/min): 2.3

Flow/PSI(Front_EFC, Type 1):

Step	Pres (psi)	Rate (psi/min)	Hold (min)	Total (min)
Initial	*	-------	10	10

Constant Flow Mode Enable: NO
Column Flow Rate (ml/min): 2.6

Detector: **Front ECD**

ECD Oven Power: ON
Temperature (°C) 300
Electronics: ON
Range: 1

Time	Range	Autozero
Initial	1	YES

Front ECD Adjustment
Time Constant: Fast
Cell Current: CAP
Contact Potential (mV): *

Middle ECD

ECD Oven Power: ON
Temperature (°C) 300
Electronics: ON
Range: 1

Time	Range	Autozero
Initial	1	YES

Fast
CAP
*

*values may change with use

Front ECD Adjustments
Make-up Flow (mL/min) 30

Middle ECD Adjustments
Make-up Flow (mL/min) 35

Analog Output

Detectors: Front: ECD Attenuation 1
Middle: ECD Attenuation 1
Rear: None

Time	Signal Source	Attenuation
Initial	Front Detector	1
Time	Signal Source	Attenuation
Initial	Middle Detector	1
Time	Signal Source	Attenuation
Initial	Rear Detector	1

Valve Table:

Time	1 None	2 None	3 None	4 None	5 None	6 None	7 None
Initial	-----	-----	-----	-----	-----	-----	-----

Initial valve state=Off

6

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P O Box: 66
Syracuse
New York 13214-0066
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www.arcadis-us.com

ENVIRONMENT

PCB Coordinator
U.S. EPA Region 5
Mailstop LU-9J
77 W. Jackson Blvd
Chicago, IL 60604

Subject:
GE Aviation – Altitude Test Facility
Data Summary of Twentieth Air Sampling Event – October 2014

Date:
November 7, 2014

Dear PCB Coordinator:

On October 23, 2014, GE Aviation, an operating division of the General Electric Company (GE), performed indoor air testing activities at the Altitude Test Facility (ATF) at GE's facility in Evendale, Ohio, in accordance with EPA's January 16, 2014 amendment to EPA's December 19, 2012 approval allowing GE to use the ATF for jet engine testing pursuant to 40 CFR § 761.62(c). This report is being submitted pursuant to Consent Agreement and Final Order (TSCA-05-2014-0008) filed on April 28, 2014.

GE collected two air samples during active jet engine testing at the ATF on October 23, 2014, and received the laboratory report containing the results on October 29, 2014. Both samples were "non-detect" for PCBs. Details on the sampling event follow.

Air test sample ATF-AR-C43-14, located adjacent to the #43 Test Cell Chamber of the ATF, and air test sample ATF-AR-CR2-20, located on the second floor of the compressor room, were both taken over an 8-hour interval. The samples were collected on October 23, 2014, prior during active jet engine testing at the ATF. Calibration and preparation of the air samples followed Method TO-10A: Compendium of Methods for Toxic Organic Air Pollution. Both air pumps were placed in a manner such that the air sample would be collected from the breathing zone. The laboratory analytical results of the sampling event are provided in the Data Summary Table, attached as Table 1 and the sampling locations are provided on the attached Figure 1. As indicated in the attachments, sample ATF-AR-C43-14

(collected adjacent to Test Cell #43) was non-detected (ND) for PCBs, and sample ATF-AR-CR2-20 (collected from the second floor of the ATF compressor room) had non-detected (ND) PCBs. The laboratory quantitation limit (PQL) for these results was 41.7 ng/m^3, with a final extraction volume of 5.0 mL. The specific operating parameters of the analytical instruments used by PACE Analytical during sample analysis are detailed in Attachment 1.

Please do not hesitate to contact John Rumpf, Counsel for Environmental Affairs at GE Aviation, at (513) 243-4256 or Christopher Bell at Greenberg Traurig LLP at (713) 374-3556 if you have any questions.

Sincerely,

ARCADIS of New York, Inc.

John F. Novotny, PE
Senior Engineer

Attachments
Table 1
Figure 1
Attachment 1

Copies:
John Rumpf, GE
Christopher Bell, Greenberg Traurig, LLP

Table 1
Data Summary - PCB Air Monitoring -October 2014

GE - Aviation - Altitude Test Facility
Cincinnati, Ohio

Sampling ID	Date Collected	Time Collected	Sample Type	Total PCBs (ng/m^3)	Location Description
Event 20					
ATF-AR-C43-14	10/23/2014	14:55	Air	ND	Test Cell 43 open floor area
ATF-AR-CR2-20	10/23/2014	15:00	Air	ND	Second floor of ATF Compressor Room

Notes:

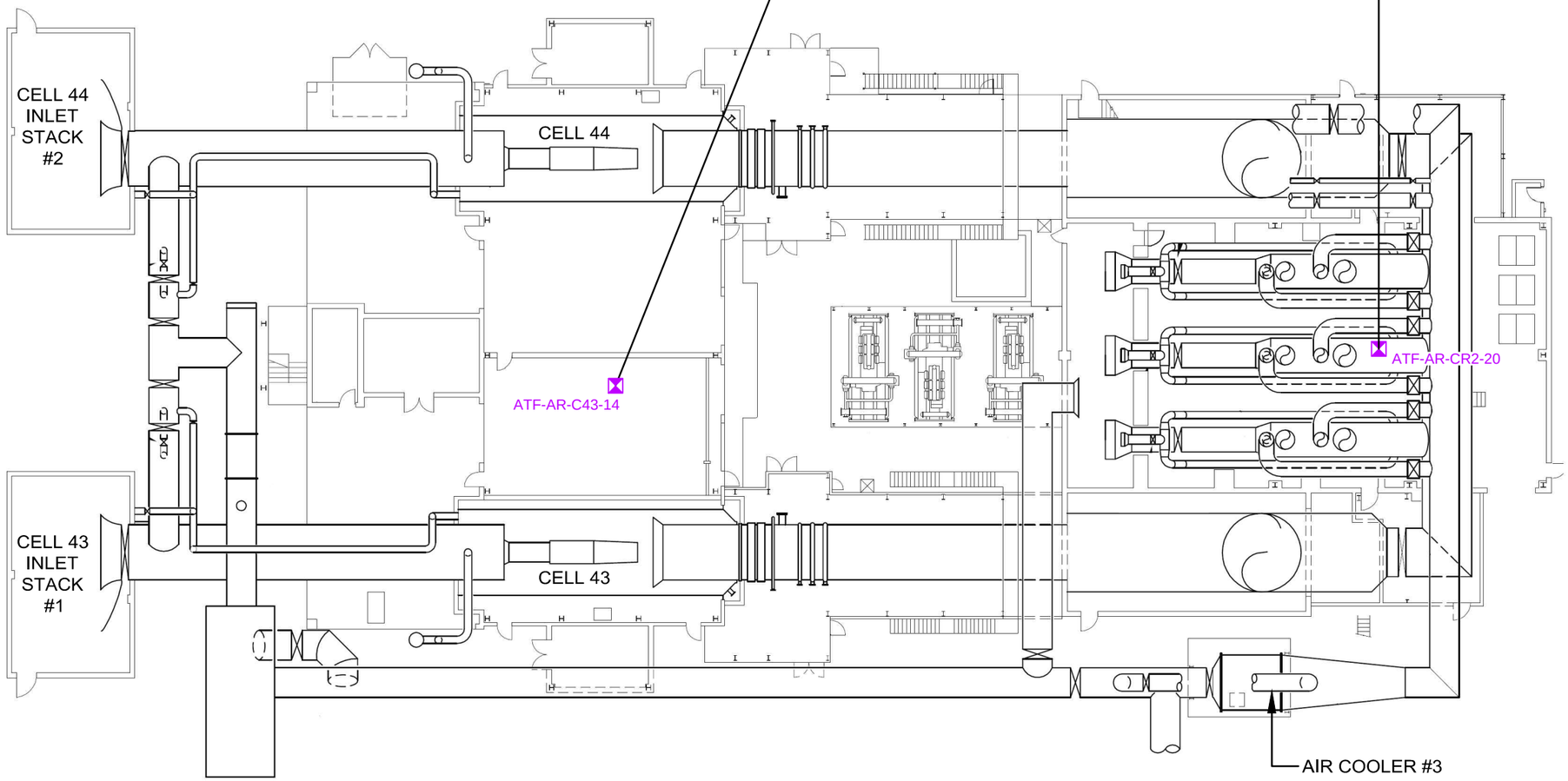
1. Samples collected by ARCADIS personnel and submitted to Pace Analytical Laboratory for analysis using USEPA Compendium Method TO-10A procedures.
2. Air pumps were set up at breathing zone height and operated over an 8-hour interval at an air intake rate of approximately 5 L/min, resulting in approximately 2,400 L of air pulled through the puff for each sample.
3. Event 20 took place at the ATF on October 23, 2014 conducted during active jet engine testing in October 2014.
4. Total PCBs - the sum of aroclors 1016 through 1268
5. The final extraction volume of 5.0 mL was conducted by the laboratory.
6. The initial injection volume of 1µL was conducted by the laboratory.
7. the Laboratory determined no sample breakthrough occurred on all sample media.
8. ND (Non-Detect) - Denotes analyte not detected at a concentration greater than the MDL
9. PQL (Practical Quantitation Limit) of 41.7 ng/m^3 per aroclor. Denotes lowest analyte concentration reportable for the sample.
10. Time Collected, denotes the time which the air pumps completed the 8-hour run interval.

Abbreviations:

ATF - Altitude Test Facility
AR - PCB air sample
C43 - Test Cell #43
CR2 - compressor room-second floor
PCBs - polychlorinated biphenyls
ng/m^3 - nanograms per cubic meter

ATF–AR–C43–14	
DATE	10/23/2014
TOTAL PCBs (ng/m³)	ND

ATF–AR–CR2–20	
DATE	10/23/2014
TOTAL PCBs (ng/m³)	ND



NOT TO SCALE

LEGEND:

- ☒ AMBIENT PCB AIR MONITORING LOCATION

SAMPLING NOMENCLATURE:

ATF – ALTITUDE TEST FACILITY

AR – PCB AIR SAMPLE

C43 – TEST CELL #43

CR2 – COMPRESSOR ROOM SECOND FLOOR

NOTES:

1. SAMPLING LOCATIONS ARE APPROXIMATE.
2. ng/m³ – NANOGRAMS PER CUBIC METER
3. TOTAL PCBs – THE SUM OF AROCLORS 1016 THROUGH 1268.
4. J – DENOTES AN ESTIMATED CONCENTRATION. THE CONCENTRATION RESULT IS GREATER THAN OR EQUAL TO THE METHOD DETECTION LIMIT (MDL) BUT LESS THAN THE PQL.

GE-AVIATION
CINCINNATI, OHIO
AIR TEST SUMMARY REPORT

DATA SUMMARY - PCB RESULTS
AMBIENT PCB AIR MONITORING

ARCADIS

FIGURE
1

CITY: SYRACUSE, NY DIV/GROUP: ENVCAD DB: L.POSENAUER LD:(Opt) PIC:(Opt) PM: C.AVERILL TM:(Opt) LYR:(Opt)ON=*;OFF=*REF*
V:\ENVCAD\SYRACUSE\ACTIN\B0031335\2013\RES01\ATSR\31335C16.dwg LAYOUT: 1 SAVED: 10/30/2014 10:50 AM ACADVER: 18.1S (LMS TECH) PAGESETUP: ---- PLOTSTYLETABLE: PLTFULL.CTB PLOTTED: 10/30/2014 10:50 AM BY: POSENAUER, LISA
XREFS: 31335X00 IMAGES: 31335X01.png

GC #: **GC-21 8082 High Level Method HYDROGEN**
Method: **Method 3**
Column: **GC21F ZB-1MS 20M 0.18mm 0.18um**
GC21B ZB-5 20M 0.18mm 0.18um
Date: 2/15/2013
Analyst: JKA
File Name: C:\Users\KELLYH~1.NOR\AppData\Local\Temp\XPgrpwise\[GC21_Parameters_1.xls]8082 H2 HL

Sample Delivery: SEE LEAP PARAMETERS

Column Oven:

Step	Temp (°C)	Rate (°C/min)	Hold (min)	Total (min)
Initial	150	-------	1.41	1.41
1	290	17.5	0.65	10.06

Stabilization Time (min): 0.50

Injector: **Front CP-1177**

1177 Oven Power: ON
1177 Temperature (°C) 300

Time	Split State	Split Ratio
Initial	ON	35

Flow/PSI(Front_EFC, Type 1):
Carrier Gas : Helium

Step	Pres (psi)	Rate (psi/min)	Hold (min)	Total (min)
Initial	*	-------	10	10

Constant Flow Mode Enable: NO
Column Flow Rate (ml/min): 2.3

Injector: **Middle CP-1177**

1177 Oven Power: ON
1177 Temperature (°C) 300

Time	Split State	Split Ratio
Initial	ON	35

Flow/PSI(Front_EFC, Type 1):

Step	Pres (psi)	Rate (psi/min)	Hold (min)	Total (min)
Initial	*	-------	10	10

Constant Flow Mode Enable: NO
Column Flow Rate (ml/min): 2.6

Detector: **Front ECD**

ECD Oven Power: ON
Temperature (°C) 300
Electronics: ON
Range: 1

Time	Range	Autozero
Initial	1	YES

Front ECD Adjustment
Time Constant: Fast
Cell Current: CAP
Contact Potential (mV): *

Middle ECD

ECD Oven Power: ON
Temperature (°C) 300
Electronics: ON
Range: 1

Time	Range	Autozero
Initial	1	YES

Fast
CAP
*

*values may change with use

Front ECD Adjustments
Make-up Flow (mL/min) 30

Middle ECD Adjustments
Make-up Flow (mL/min) 35

Analog Output

Detectors: Front: ECD Attenuation 1
Middle: ECD Attenuation 1
Rear: None

Time	Signal Source	Attenuation
Initial	Front Detector	1
Time	Signal Source	Attenuation
Initial	Middle Detector	1
Time	Signal Source	Attenuation
Initial	Rear Detector	1

Valve Table:

Time	1 None	2 None	3 None	4 None	5 None	6 None	7 None
Initial	-----	-----	-----	-----	-----	-----	-----

Initial valve state=Off

6

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ENVIRONMENT

PCB Coordinator
U.S. EPA Region 5
Mailstop LU-9J
77 W. Jackson Blvd
Chicago, IL 60604

Subject:
GE Aviation – Altitude Test Facility
Data Summary of Twenty-first Air Sampling Event – October 2014

Date:
November 18, 2014

Dear PCB Coordinator:

On October 30, 2014, GE Aviation, an operating division of the General Electric Company (GE), performed indoor air testing activities at the Altitude Test Facility (ATF) at GE's facility in Evendale, Ohio, in accordance with EPA's January 16, 2014 amendment to EPA's December 19, 2012 approval allowing GE to use the ATF for jet engine testing pursuant to 40 CFR § 761.62(c). This report is being submitted pursuant to Consent Agreement and Final Order (TSCA-05-2014-0008) filed on April 28, 2014.

GE collected two air samples following the completion of active jet engine testing at the ATF on October 30, 2014, and received the laboratory report containing the results on November 10, 2014. Both samples were "non-detect" for PCBs. Details on the sampling event follow.

Air test sample ATF-AR-C43-15, located adjacent to the #43 Test Cell Chamber of the ATF, and air test sample ATF-AR-CR2-21, located on the second floor of the compressor room, were both taken over an 8-hour interval. The samples were collected on October 30, 2014, following the completion of active jet engine testing at the ATF. Calibration and preparation of the air samples followed Method TO-10A: Compendium of Methods for Toxic Organic Air Pollution. Both air pumps were placed in a manner such that the air sample would be collected from the breathing zone. The laboratory analytical results of the sampling event are provided in the Data Summary Table, attached as Table 1 and the sampling locations are provided on the attached Figure 1. As indicated in the attachments, sample ATF-AR-C43-15

(collected adjacent to Test Cell #43) was non-detected (ND) for PCBs, and sample ATF-AR-CR2-21 (collected from the second floor of the ATF compressor room) had non-detected (ND) PCBs. The laboratory quantitation limit (PQL) for these results was 41.7 ng/m^3, with a final extraction volume of 5.0 mL. The specific operating parameters of the analytical instruments used by PACE Analytical during sample analysis are detailed in Attachment 1.

Please do not hesitate to contact John Rumpf, Counsel for Environmental Affairs at GE Aviation, at (513) 243-4256 or Christopher Bell at Greenberg Traurig LLP at (713) 374-3556 if you have any questions.

Sincerely,

ARCADIS of New York, Inc.

John F. Novotny, PE
Senior Engineer

Attachments
Table 1
Figure 1
Attachment 1

Copies:
John Rumpf, GE
Christopher Bell, Greenberg Traurig, LLP

Table 1
Data Summary - PCB Air Monitoring -October 2014

GE - Aviation - Altitude Test Facility
Cincinnati, Ohio

Sampling ID	Date Collected	Time Collected	Sample Type	Total PCBs (ng/m^3)	Location Description
Event 21					
ATF-AR-C43-15	10/30/2014	15:15	Air	ND	Test Cell 43 open floor area
ATF-AR-CR2-21	10/30/2014	15:20	Air	ND	Second floor of ATF Compressor Room

Notes:

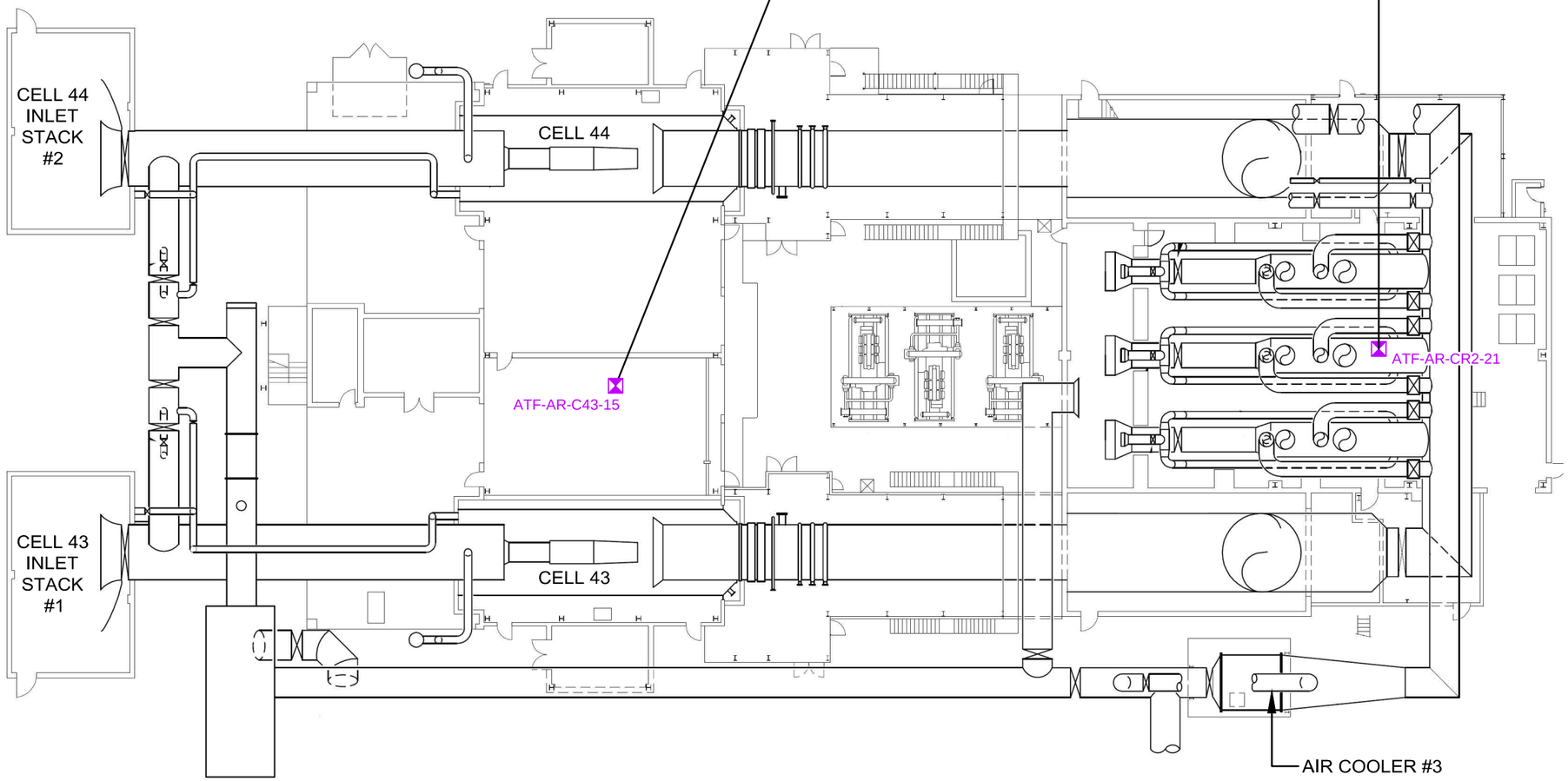
1. Samples collected by ARCADIS personnel and submitted to Pace Analytical Laboratory for analysis using USEPA Compendium Method TO-10A procedures.
2. Air pumps were set up at breathing zone height and operated over an 8-hour interval at an air intake rate of approximately 5 L/min, resulting in approximately 2,400 L of air pulled through the puff for each sample.
3. Event 21 took place at the ATF on October 30, 2014 conducted following active jet engine testing in October 2014.
4. Total PCBs - the sum of aroclors 1016 through 1268
5. The final extraction volume of 5.0 mL was conducted by the laboratory.
6. The initial injection volume of 1µL was conducted by the laboratory.
7. the Laboratory determined no sample breakthrough occurred on all sample media.
8. ND (Non-Detect) - Denotes analyte not detected at a concentration greater than the MDL
9. PQL (Practical Quantitation Limit) of 41.7 ng/m^3 per aroclor. Denotes lowest analyte concentration reportable for the sample.
10. Time Collected, denotes the time which the air pumps completed the 8-hour run interval.

Abbreviations:

ATF - Altitude Test Facility
AR - PCB air sample
C43 - Test Cell #43
CR2 - compressor room-second floor
PCBs - polychlorinated biphenyls
ng/m^3 - nanograms per cubic meter

ATF–AR–C43–15	
DATE	10/30/2014
TOTAL PCBs (ng/m³)	ND

ATF–AR–CR2–21	
DATE	10/30/2014
TOTAL PCBs (ng/m³)	ND



NOT TO SCALE

LEGEND:

AMBIENT PCB AIR MONITORING LOCATION

SAMPLING NOMENCLATURE:

ATF – ALTITUDE TEST FACILITY

AR – PCB AIR SAMPLE

C43 – TEST CELL #43

CR2 – COMPRESSOR ROOM SECOND FLOOR

NOTES:

1. SAMPLING LOCATIONS ARE APPROXIMATE.
2. ng/m³ – NANOGRAMS PER CUBIC METER
3. TOTAL PCBs – THE SUM OF AROCLORS 1016 THROUGH 1268.
4. J – DENOTES AN ESTIMATED CONCENTRATION. THE CONCENTRATION RESULT IS GREATER THAN OR EQUAL TO THE METHOD DETECTION LIMIT (MDL) BUT LESS THAN THE PQL.

GE-AVIATION
CINCINNATI, OHIO
AIR TEST SUMMARY REPORT

DATA SUMMARY - PCB RESULTS
AMBIENT PCB AIR MONITORING

ARCADIS

FIGURE
1

CITY: SYRACUSE, NY DIV/GROUP: ENVCAD DB: L.POSENAUER LD:(Opt) PIC:(Opt) PM: C.AVERILL TM:(Opt) LYR:(Opt)ON=*;OFF=*REF*
V:\ENVCAD\SYRACUSE\ACTIN\B0031335\2013\RES01\ATSR\31335C17.dwg LAYOUT: 1 SAVED: 11/12/2014 9:19 AM ACADVER: 18.1S (LMS TECH) PAGESETUP: ---- PLOTSTYLETABLE: PLTFULL.CTB PLOTTED: 11/12/2014 9:19 AM BY: POSENAUER, LISA
XREFS: 31335X00 IMAGES: 31335X01.png

GC #: **GC-20 8082 High Level Hydrogen**
Method: **Method 3**
Column: **GC20F ZB-1MS 20M 0.18mm 0.18um**
GC20B ZB-5 20M 0.18mm 0.18um
Date: 7/9/2014
Analyst: JKA
File Name: C:\Users\KELLYH~1.NOR\AppData\Local\Temp\XPgrpwise\[GC20_Parameters_1.xls]8082 HL H2

Sample Delivery: SEE LEAP PARAMETERS

Column Oven:

Step	Temp (°C)	Rate (°C/min)	Hold (min)	Total (min)
Initial	150	-------	1.41	1.41
1	290	17.5	0.65	10.06

Stabilization Time (min): 0.5

Injector: Front CP-1177

1177 Oven Power: ON
1177 Temperature (°C) 300

Time	Split State	Split Ratio
Initial	ON	35

Flow/PSI(Front EFC, Type 1):

Step	Pres (psi)	Rate (psi/min)	Hold (min)	Total (min)
Initial	*	-------	10	10

Constant Flow Mode Enable: NO
Column Flow Rate (ml/min): 1.5

Injector: Middle CP-1177

1177 Oven Power: ON
1177 Temperature (°C) 300

Time	Split State	Split Ratio
Initial	ON	30

Flow/PSI(Front EFC, Type 1):

Step	Pres (psi)	Rate (psi/min)	Hold (min)	Total (min)
Initial	*	-------	10	10

Constant Flow Mode Enable: NO
Column Flow Rate (ml/min): 1.5

Detector: **Front ECD**

ECD Oven Power: ON
Temperature (°C) 300
Electronics: ON
Range: 1

Time	Range	Autozero
Initial	1	YES

ECD Adjustment
Time Constant: Fast
Cell Current: CAP
Contact Potential (mV): *

Middle ECD

ECD Oven Power: ON
Temperature (°C) 300
Electronics: ON
Range: 1

Time	Range	Autozero
Initial	1	YES

Fast
CAP
*

Front ECD Adjustments
Make-up Flow (mL/min) 35

Middle ECD Adjustments
35

Analog Output

Detectors: Front: ECD
Middle: ECD
Rear: None

*values may change with use

Time	Signal Source	Attenuation
Initial	Front Detector	1
Time	Signal Source	Attenuation
Initial	Middle Detector	1
Time	Signal Source	Attenuation
Initial	Rear Detector	1

Valve Table:

Time	1 None	2 None	3 None	4 None	5 None	6 None	7 None
Initial	-----	-----	-----	-----	-----	-----	-----

Initial valve state=Off

6

Attachment F

PCB Awareness Training

GE Aviation - Evendale

Toxic Substances Control Act (TSCA)
PCB Awareness Training
Altitude Test Facility (ATF)

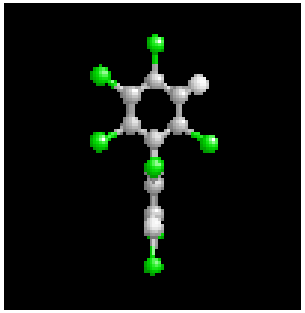
2014 - 15

imagination at work

Outline

- Polychlorinated Biphenyls (PCBs) – What Are They ?
- Overview of TSCA Regulations (40 CFR 761)
- Altitude Test Facility (ATF) – PCBs in Paint
- ATF – Consent Agreement and Final Order (CAFO)
- ATF – Standard Operation Procedures (SOPs)
- Questions?

PCBs – What are they?



- Polychlorinated biphenyls (PCBs) – manufactured chemical produced by Monsanto in the United States (1932 thru 1977).
- PCBs were used due to their heat and fire-resistant qualities (e.g., mandated by government for use in electrical equipment).
- Historical uses include, but not limited to: transformers, capacitors, light ballasts, hydraulic fluids, cutting oils, circuit breakers, **paints**, etc.
- Congress banned the manufacture of PCBs in the late 1970s in the Toxic Substances Control Act ("TSCA") due to health and environmental concerns .

Items manufactured prior to 1979 might have PCBs

TSCA Regulations (40 CFR 761)

- 40 CFR 761.20 - establishes general prohibitions on manufacture, use, processing and distribution in commerce of PCBs.
- Paints and coatings that contain equal to or greater than 50 parts per million ($\geq$ 50 ppm) of PCBs are generally not authorized for use.
- Waste that contains $\geq$ 50 ppm PCBs is regulated by USEPA's PCB regulations (as well as some wastes that contain < 50 ppm PCBs).

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ATF – Short and Long Term Plans; CAFO

- A Short-Term Plan was proposed and approved b y USEPA in late 2012 that allowed four engine tests in 2013.
- A Long-Term Plan was proposed by GE to USEPA , and resulted in a Consent Agreement and Final Order (CAFO) that was signed into effect on April 28, 2014. Key highlights of the CAFO are as follows:
    - Removal of paint from the interior of the duct piping network (Phase 1) - completed December 2013.
    - Removal of exposed paint from the exterior of the duct piping network (Phase 2) not covered by aluminum-clad insulation - completed December 2014.
    - Maintain the aluminum-clad insulation (which includes asbestos containing material) on the exterior of the piping.
    - Place and maintain PCB ML Markers at access points to the ATF.
- NOTE: GE has initiated Phase 3 efforts consisting of removal of all remaining paint (from beneath the aluminum insulation) – targeted completion date within the timeframes allowed under the CAFO.

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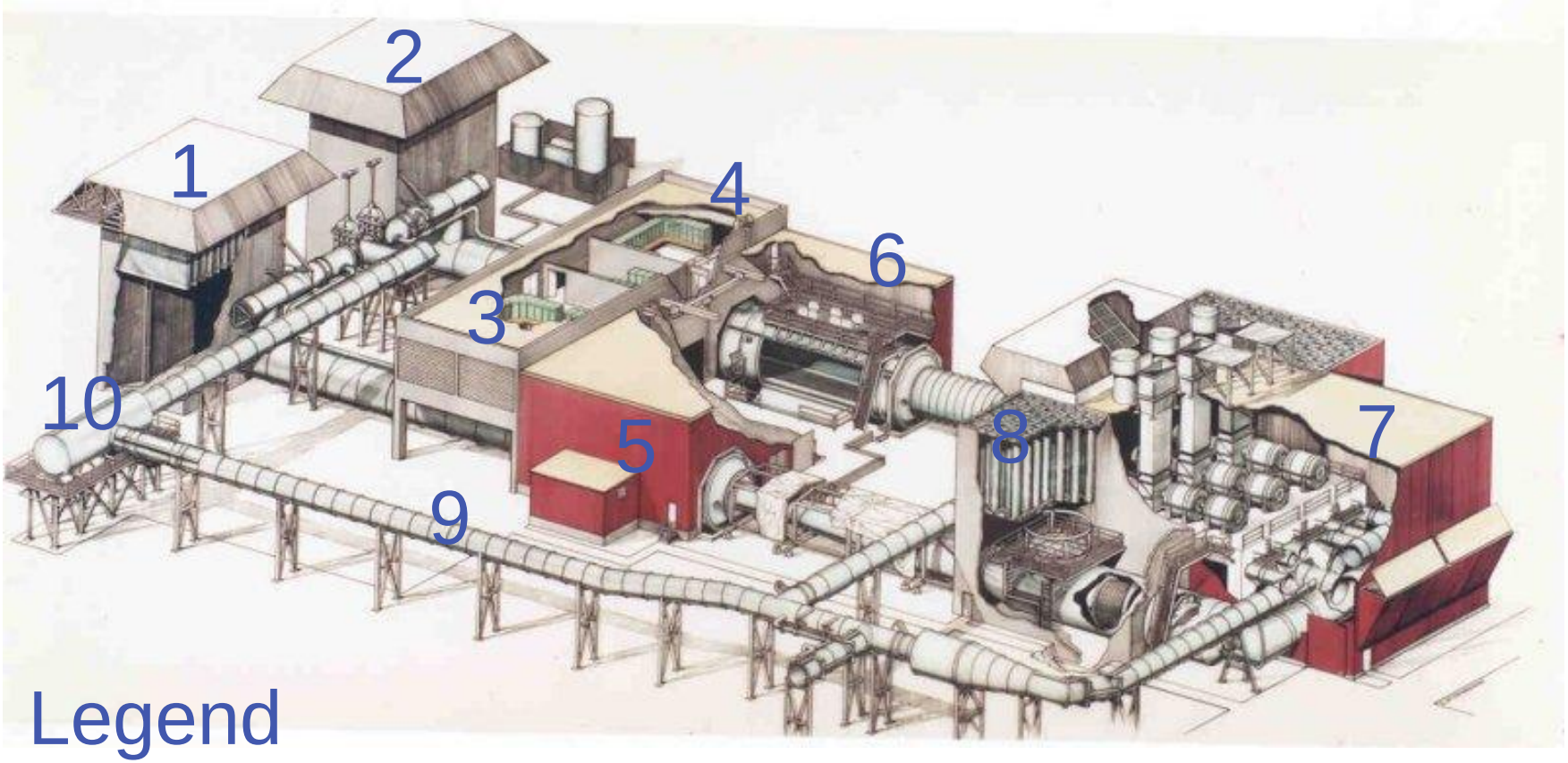
Altitude Test Facility



Legend

1. Cell 43 Sea Level Inlet Stack
2. Cell 44 Sea Level Inlet Stack
3. Cell 43 Control Room
4. Cell 44 Control Room
5. Cell 43 Test Chamber
6. Cell 44 Test Chamber
7. Compressor Facility with 3 LM1500's and 6 FS5 Compressors
8. Exhaust Stack
9. Ducting
10. Coen Unit

imagination at work

ATF – PPE and Waste Standard Operating Procedures (SOPs)

Stripping or Roughening Paint for Recoating; External Maintenance, Painting (until remediation complete)

- Protective Suit - Tyvek suit
- Gloves - nitrile or equivalent
- Respirator – A Powered Air Purifying Respirator (PAPR) with P100 pre-filters and chemical cartridges (if removing paint). If painting only, then a PAPR or half face respirator with the P100 and chemical cartridge will be required. Activities that do not disturb the paint do not require a respirator.
- Waste to be managed by Clean Harbors as PCB-TCSA containing. Manifests to be maintained as part of record keeping.

imagination at work

QUESTIONS ?

Contact EHS:

Jennifer Hardenbrook: (513) 243-9702

Joanne Reinhold: (513) 243-4727

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Attachment G

GE Aviation Evendale, Ohio Facility: Request for Amendment to December 19, 2012 EPA Approval Pursuant to 40 CFR § 761.62(c) (December 18, 2013)

GE
Aviation

Tony Aiello
Vice President & General Manager
Assembly, Test & Overhaul

One Neumann Way
Mail Drop G101
Cincinnati, Ohio 45215
United States of America
513 243 6800

December 18, 2013

Susan Hedman
Regional Administrator
U.S. EPA Region 5
77 W. Jackson Blvd
Chicago, IL 60604

RE: GE Aviation Evendale, Ohio Facility: Request For Amendment To December 19, 2012 EPA Approval Pursuant To 40 CFR § 761.62(c)

Dear Administrator Hedman:

This is a request, made pursuant to 40 C.F.R. § 761.62(c), by GE Aviation, an operating division of the General Electric Company ("GE"), to amend the interim risk-based alternative cleanup approval issued by U.S. EPA on December 19, 2012 ("EPA Approval"). The EPA Approval addresses the presence of PCB-containing paint that was discovered on the inlet air induction system at the Altitude Test Facility ("ATF") at GE's jet engine manufacturing facility in Cincinnati, Ohio.

Current Status

The EPA Approval allowed GE to conduct four jet engine tests in 2013 (including tests for the U.S. military to address potential flight readiness, reliability and safety issues) in a manner that did not pose an unreasonable risk to human health and the environment. Those tests were conducted pursuant to conditions specified in the EPA Approval, including:

- The interior of the inlet air induction piping network was double washed, double rinsed and double painted, consistent with 40 C.F.R. § 761.30(p).
- Air sampling was conducted during each of the engine tests to ensure that PCB concentrations in the air were protective for occupational exposure (that data was submitted to EPA).

- The exterior of the inlet air induction pipes was to remain, with the exception of certain fittings and appurtenances, covered with a multi-layered protective barrier, completed with an aluminum sheathing.
- PCB M_L signs were installed at appropriate locations, including entrance points to the ATF.
- GE employees and contractors were made aware of the presence of PCB-containing paint on the inlet air induction pipes, and work practices were implemented to limit employee exposure to such paint.
- GE implemented an operations plan for the management of wastes as potentially PCB-containing.

Pursuant to Condition 17 of the EPA Approval, GE and EPA have been developing a long-term plan ("Long-Term Plan") to address the PCB-containing paint at the ATF and establish the conditions for future jet engine testing at the facility. Major elements of the remedial portion of the Long-Term Plan are already well underway. For example, as of this date, all of the paint on the interior of the ATF's air ducting system has been removed, and significant progress has been made in removing PCB-containing paint from appurtenances and other portions of the system that are not protected by the multi-layer and aluminum-clad barrier.

EPA and GE are also in the process of negotiating an administrative consent order that, among other matters, will address the enforceability of the Long-Term Plan.

Request For Amendment To EPA Approval

GE requests that the EPA Approval be amended to allow jet engine testing to take place up to and including April 30, 2014, while EPA and GE finalize the details of the Long-Term Plan and the administrative consent order. This will allow GE to meet the requirements of its customers, in particular the military, which has scheduled a jet engine test for early January, 2014.

GE proposes that the amended approval include by reference the conditions set forth in the Long-Term Plan submitted to EPA on December 4, 2013 (including the provisions on air monitoring).

Proceeding in this manner will not result in any unreasonable risk to human health or the environment. Indeed, the conditions for these tests will be even more protective than those conducted pursuant to the EPA Approval, given the remedial work that has been conducted at the ATF (e.g., the removal of all of the legacy paint from the interior of the ducting) and the enhanced conditions of the Long-Term Plan.

Accordingly, GE requests that EPA amend the December 19, 2012 Approval to allow jet engine testing to be conducted at the ATF through April 30, 2014, incorporating by reference the conditions set forth in the Long-Term Plan submitted to EPA on December 4, 2013. Given the requirements of GE's military customers, GE requests that this request be granted before the end of the year.

Please do not hesitate to contact John Rumpf, Executive Counsel for Environmental Affairs at GE Aviation, at (513) 243-4256 or Christopher Bell at Greenberg Traurig at (713) 374-3556 if you have any questions.

Sincerely,

Tony Aiello
Vice President, Assembly, Test & Overhaul

cc: Peter Ramanauskas, Regional PCB Coordinator, U.S. EPA Region 5
Susan Perdomo, Counsel, U.S. EPA Region 5
John Rumpf, Executive Counsel for Environmental Affairs, GE Aviation
Christopher Bell, Greenberg Traurig LLP

Attachment H

USEPA Region 5 January 16, 2014 Amendment Approval Letter

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

JAN 16 2014

Tony Aiello
Vice President, Assembly, Test & Overhaul
GE Aviation
One Neumann Way
Mail Drop G101
Cincinnati, Ohio 45215

Re: GE Aviation Short-Term Section 761.62(c) Submission

Dear Mr. Aiello:

This is in response to the General Electric (GE) request, dated December 19, 2013, to amend the December 19, 2012 U.S. Environmental Protection Agency approval (EPA Approval) issued to GE for the interim risk-based alternative cleanup solution to address the presence of Polychlorinated Biphenyl (PCB) containing paint discovered on the inlet air induction system at GE's Altitude Test Facility (ATF) in Cincinnati, Ohio.

Under TSCA §6(e), use of PCBs is banned unless specifically authorized or excepted by regulation. Authorizations are provided for under 40 CFR §761.30 and exceptions appear at §761.20. Use of any PCBs not authorized or excepted under these rules is prohibited in the United States. The ATF site contains PCB paint that exceeds the allowable levels under the federal PCB regulations at 40 Code of Federal Regulations (CFR) §761.20(a) and §761.62. Therefore, use of the PCB paint at the ATF is not permitted as it is not an authorized or excepted use under 40 CFR §§761.20 and 761.30.

GE requests an Amendment to the EPA Approval in order to conduct jet engine testing between January 1 and April 30, 2014, while EPA and GE finalize the details of the Long-Term Plan required under the EPA Approval and the administrative Consent Agreement and Final Order (CAFO) that will govern the long term use of the air induction system in the ATF. In support of the request to amend the EPA Approval, GE states that it has complied with the majority of the conditions set forth in the EPA Approval. EPA concurs with this assessment.

GE has completed the following activities under the terms of EPA's Approval:

- The interior of the inlet air induction piping network was double washed, double rinsed and double painted, consistent with 40 CFR §761.30(p).

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on 100% Recycled Paper (100% Post-Consumer)

- Air sampling was conducted during each of the engine tests to ensure that PCB concentrations in the air were protective for occupational exposure and results were submitted to EPA.

- The exterior of the inlet air induction pipes are, with the exception of certain fittings and appurtenances, covered with a multi-layer protective barrier, completed with aluminum sheathing. This covering is being maintained and GE is making progress in removing PCB paint from those portions of the exterior piping that are not protected by the multi-layer and aluminum-clad barrier.

- PCB M_L signs were installed at appropriate locations, including entrance points to the ATF.

- GE employees and contractors were made aware of the presence of PCB containing paint on the inlet air induction pipes and work practices are in place to limit their exposure to such paint.

- GE implemented an operations plan for the management of wastes (e.g., PPE, etc.) as potentially PCB-containing for storage and disposal purposes.

In addition, GE and EPA have exchanged numerous drafts of the Long-Term Plan required under Condition 17 of the EPA Approval intended to address the PCB-containing paint at the ATF and to establish the conditions for future jet engine testing at the facility (Long-Term Plan). EPA anticipates approving the final submission in the next month.

Based on EPA's review of both the information provided in the request to amend the EPA Approval and the near final Long-Term Plan and, given the extent of remedial work conducted at the ATF since the EPA Approval was issued in December 2012, EPA finds that GE's request should not result in direct exposure of PCB surfaces to building users during this time period and should be protective of human health and the environment during this limited testing period.

Accordingly, EPA agrees to amend its December 19, 2012 Approval to permit jet engine testing between January 1 and April 30, 2014, subject to the conditions set forth in the Attachment to this Amended Approval.

EPA emphasizes that this Amended Approval is for GE to conduct the limited jet engine testing and will expire on April 30, 2014. EPA expects to have in place by May 1, 2014 an administrative CAFO that, among other matters, will address the enforceability of the Long-Term Plan. EPA reserves its right to require additional investigation or mitigation measures at the ATF.

GE is responsible for ensuring continued compliance with all applicable provisions of the Toxic Substances Control Act, the federal PCB regulations, and the conditions of this Amended Approval. Any departure from the conditions of this Amended Approval or the request for an amendment must receive prior written authorization from this office. Further, this Amended Approval does not relieve GE from compliance with any other federal, State, or local regulatory requirements. This Amended approval does not preclude EPA from initiating any enforcement action, including an action seeking civil penalties, suspension or termination of the approval for any violation, or requiring additional cleanup should GE fail to abide by this Amended Approval.

If you have any questions regarding this approval, please do not hesitate to call Peter Ramanauskas, of my staff, at (312) 886-7890.

Sincerely,

Margaret M. Guerriero
Director
Land and Chemicals Division

Enclosure

PCB RISK-BASED APPROVAL CONDITIONS
GE AVIATION – ALTITUDE TEST FACILITY

GENERAL CONDITIONS

1) This Approval is granted under the authority of Section 6(e) of the Toxic Substances Control Act (TSCA), 15 U.S.C. §2605(e), and the Federal PCB Regulations at 40 CFR Part 761, and applies solely to the PCB Bulk Product Waste located at the site.

2) GE shall conduct on-site activities in accordance with the conditions of this Amended Approval (Approval).

3) The terms and abbreviations used herein shall have the meanings as defined in 40 CFR §761.3 unless otherwise defined in this Approval.

4) All sampling and analysis conducted under this Approval will be performed in accordance with the EPA Region 5 RCRA Quality Assurance Project Plan Policy (April 1998) as appropriate for the site. EPA may audit laboratories selected by GE or require GE to purchase and have analyzed any Performance Evaluation ("PE") samples selected by EPA.

5) GE must comply with all applicable federal, state, and local regulations in the storage, handling, and disposal of all PCB wastes, including PCBs, PCB Items, and decontamination wastes generated under this Approval.

6) GE is responsible for the actions of all officers, employees, agents, contractors, subcontractors, and others who are involved in activities conducted under this Approval. If at any time GE has or receives information indicating that GE has failed, or may have failed, to comply with any provision of this Approval, it must report the information to EPA in writing within 24 hours of having or receiving the information.

7) This Approval does not constitute a determination by EPA that the transporters or disposal facilities selected by GE are authorized to conduct the activities set forth in GE's November 16, 2012 Submission. GE is responsible for ensuring that its selected transporters and disposal facilities are authorized to conduct these activities in accordance with all applicable federal, state, and local statutes and regulations.

8) This approval does not: 1) waive or compromise EPA's enforcement and regulatory authority; 2) release GE from compliance with any applicable requirements of federal, state, or local law; or 3) release GE from liability for, or otherwise resolve, any violations of federal, state, or local law.

INTERIM OPERATIONAL CONDITIONS

9) All PCB contaminated paint from the interior of the inlet air induction piping network will be removed and disposed of off-site in accordance with 40 CFR §761.62.

10) PCB M_L signs will be installed and maintained at appropriate locations, including entrance points to the ATF.

11) The exterior of the inlet air induction pipes are, with the exception of certain fittings and

appurtenances, covered with a multi-layer protective barrier complete with an aluminum sheathing. This covering will be maintained and the piping marked appropriately as follows:

i) GE will conduct monthly inspections of the air induction piping network in addition to monthly PCB M_L marker inspections. The markers will be posted at exterior entrances, access points, and exterior pipe locations (e.g., elevated stairways, catwalks, overhead doors, entrances, ductwork, etc.) The ATF piping network inspection will include a visual inspection of the encapsulating barrier to verify that it is free from damage, including but not limited to, corrosion, water damage, cracks, and/or breakage. These inspections will be performed along all accessible portions of the approximate 1,500-foot length of the encapsulated piping. Where necessary, due to elevated piping and/or tight confines, GE will use alternate means (including, but not limited to, man lifts, confined space entry permit, etc.) to gain limited access to the pipe network in order to complete the monthly pipe inspection. Any damage will be identified on an inspection log and either will be repaired promptly or addressed as part of a pipe or barrier replacement project.

In addition to routine monthly visual inspections, the ATF piping network, including the encapsulating barrier, will be subject to a condition assessment by a third-party engineering firm every five years. This assessment will include the following elements:

- A comparison of current conditions to the design parameters of the piping network, including material specifications, design diameters, and wall thickness.
- An evaluation of the operating parameters of the piping network, including design temperature and pressures.
- A description of any modifications, repairs, or significant visual inspection findings since the last assessment.
- An assessment of the piping network's fitness for continued use (e.g., greater than 50% of the pipe wall thickness remains – continued use of the pipe is satisfactory).
- Any recommendations regarding the repair or replacement of portions of the piping system.

The findings from the third-party condition assessment will be summarized in a final report that will be maintained and be available for EPA review.

12) To ensure indoor air PCB concentrations remain protective for occupational exposures during the engine tests scheduled between January 1 and April 30, 2014, indoor air sampling shall be conducted before, during, and after engine testing at locations outside of the control room but within the ATF where there is the potential for maximum exposure time for occupational workers as follows:

i) One sampling event will be conducted during the test preparation period (i.e., pre-engine operation), one sampling event will be conducted during engine operation, and one sampling event will be conducted during the test shutdown period (i.e., following the completion of

engine test) at two ambient PCB monitoring locations (A and B). Monitoring location A is on the ground floor of the ATF, just outside of the engine test chamber (either chamber # 43 or # 44, at the location of the engine being tested). This is an area from which workers periodically may observe the jet engine testing process. Monitoring location B is on the second floor mezzanine level of the ATF, near the air compressors. This is an area from which workers periodically may monitor the operation of the compressors that are necessary to the jet engine testing process.

ii) Indoor air sampling shall be conducted in accordance with EPA Method TO-4A or TO-10A. Sufficient sample volumes shall be collected to provide a minimum laboratory reporting limit of $< 0.05\ \mu g/m^3$.

iii) Analytical results of air sampling shall be submitted to EPA within 5 business days of the GE's receipt of results.

13) To the maximum extent practical, engineering controls, such as barriers, and removal techniques, such as the use of HEPA ventilated tools, shall be used during any removal processes required during the interim operations. In addition, to the maximum extent possible, disposable equipment and materials, including PPE, will be used to reduce the amount of decontamination necessary.

14) Any paints removed from the inlet air induction system shall be disposed off-site as PCB Bulk Product Waste per 40 CFR §761.62.

15) PCB waste generated at any concentration shall be marked in accordance with 40 CFR §761.40; stored in a manner consistent with 40 CFR §761.65; and disposed of in accordance with 40 CFR §761.61 or §761.62, unless otherwise specified below.

i) Decontamination wastes and residues shall be disposed of in accordance with 40 CFR § 761.79(g)(6).

ii) Movable equipment, tools, and sampling equipment shall be decontaminated in accordance with either 40 CFR §761.79(b)(3)(i)(A), §761.79(b)(3)(ii)(A), or §761.79(c)(2).

iii) PCB contaminated water generated during decontamination or dewatering shall be decontaminated in accordance with 40 CFR §761.79(b)(1) or disposed of under §761.60.

INSPECTION, MONITORING, MODIFICATION AND REVOCATION CONDITIONS

16) GE shall allow any authorized representative of the Administrator of the EPA to inspect the site, inspect records, and take samples as may be necessary to determine compliance with the PCB regulations and this Approval. Any refusal by GE to allow such an inspection (as authorized by Section 11 of TSCA) shall be grounds for revocation of this Approval.

17) Any proposed modification or any departure from the conditions of this Approval without prior, written authorization from the EPA may result in revocation, suspension, and/or modification of the Approval, in addition to any other legal or equitable relief or remedy EPA may chose to pursue.

18) Any misrepresentation or omission of any material fact in the December 18, 2013 Request for

Amendment or in any records or reports may result in EPA's revocation, suspension, and/or modification of the Approval, in addition to any other legal or equitable relief or remedy the EPA may chose to pursue.

RECORDKEEPING AND REPORTING CONDITIONS

19) GE shall prepare and maintain all records and documents required by 40 CFR Part 761, including, but not limited to, the records required under Subparts J and K in one centralized location. All records shall be made available for inspection to authorized representatives of EPA.

20) GE shall report air sampling results to EPA pursuant to Condition 12(iii) of this Approval. GE shall report information on any PCB waste generation, disposal, and decontamination activities conducted under this Approval in a single Final Completion Report to be submitted within 120 days of the completion of activities (with the exception of on-going operation and maintenance activities). At a minimum, the Report will include the following:

- Summary package of data tables, figures, and laboratory analytical documentation for sampling that has been conducted at the ATF for the purpose of PCB-containing paint remediation.

- Indoor air sampling analytical results, including copies of accompanying analytical chains of custody and field and laboratory quality control/quality assurance checks.

- A brief narrative describing the activities performed, including any deviations from the work plans or Approvals. This narrative will include the method employed during interim cleanup, paint removal, and pipe removal/replacement activities; the location, quantity, and extent of paint removal; the location of pipe removal; quantity of waste generated; waste disposal documentation; PPE worn; methods and devices for ensuring health and safety during all work activities; and decontamination procedures.

- Copies of all waste manifests, bills of lading, and/or certificates of disposal, with an associated summary table broken down by waste type.

21) No record, report or communication required under this Approval shall qualify as a self-audit or voluntary disclosure under EPA audit, self-disclosure, or penalty policies.

Attachment I

Asbestos-Containing Material
Paint Sampling and Analyses

ARCADIS of New York, Inc.
6723 Towpath Road
P O Box 66
Syracuse
New York 13214-0066
Tel 315 446 9120
Fax 315 449 0017
www.arcadis-us.com

ENVIRONMENT

Peter Ramanauskas
U.S. EPA Region 5
77 W. Jackson Blvd
Chicago, IL 60604

Subject:
GE Aviation – Cincinnati/Altitude Test Facility
Asbestos-Containing Material (ACM) Paint Sampling and Analyses

Date:
June 18, 2013

Dear Mr. Ramanauskas:

As a follow-up to the April 25, 2013 meeting with US EPA Region 5 at your offices in Chicago, GE Aviation, an operating division of the General Electric Company (GE), recently conducted ACM sampling and analyses of the paint from the Altitude Test Facility at GE's facility in Cincinnati, Ohio.

ARCADIS personnel collected a total of eleven (11) paint ship samples from various locations of the ATF duct piping network from the painted surfaces of exposed steel pipe, associated appurtenances, and structural supports, roughly corresponding to areas from which samples were taken for purposes of PCB analyses. Samples were taken of the two types of paint likely to be disturbed during the implementation of GE's Long-Term Remediation Plan for the ATF.

Sampling was conducted by qualified environmental technicians who collected paint chip samples via pipe scrapping and placement of paint chips in lock-tite plastic baggies. Samples were sent to an Ohio-licensed ACM laboratory (ALS Laboratory Group) for testing in accordance with EPA's "Method for the Determination of Asbestos in Bulk Building Materials" – EPA/600/R-93/116 (July 1993), using Transmission Electron Microscopy (TEM). Samples, described by the lab as "gray crumbly paint" and "metallic gray crumbly paint," consisted of paint chips that were collected in zip lock bags for testing. The analytical results for all eleven paint chip samples were "non-detect" for ACM. Copies of the testing reports are included as an attachment to this letter.

In addition to resolving the question regarding the potential presence of ACM in the paint, ARCADIS looked into the issue of gaskets and “plaster” materials. Some small areas around a few joints in the piping system are protected with a filler material (perhaps plaster), which is covered by a textile or fabric material. Each of these areas appears to be in good condition. The facility manages this material under the assumption that it is potentially ACM, and has places warning labels in appropriate locations. It is also ARCADIS’ understanding that some flanged fittings contain gasket materials (due to the design of the piping system, the gasket material is not readily accessible). Some areas of the facility already contain placards warning that such gaskets may contain asbestos. As part of any future ATF duct piping network removal or repair work, if filler material and/or gaskets are encountered, they will be considered ACM for removal purposes, unless tested otherwise. The revised long-term plan will reflect this approach.

We hope this satisfies ACM questions that were raised during our meeting with US EPA in April (with the exception of the additional detail of the asbestos management procedures GE intends to employ, which will be in the revised long-term plan).

Please do not hesitate to contact me at (716) 525-6113 if you have any questions.

Sincerely,

ARCADIS of New York, Inc.

John F. Novotny, PE
Senior Engineer

Attachments
ALS Reports

Copies:
Susan Perdomo, USEPA
Jeffrey Bratko, USEPA
Brad Grams, USEPA
John Rumpf, GE
Jennifer Hardenbrook, GE
Christopher Bell, Sidley Austin, LL

Attachment A

Analytical Testing Report

ALS Laboratory Group
ANALYTICAL CHEMISTRY & TESTING SERVICES

Submitted To: John Novotny
ARCADIS LEXINGTON
2464 Fortune Drive Siute 100
Lexington KY 40509

REFERENCE DATA	**Asbestos by TEM with Gravimetric Reduction**
Sample Type:	Nonfriable Bulk Material with Organic Binder
Method Reference:	EPA/600/R-93/116, Chatfield Method
Client Sample Nos.:	ATF-PC-T0502-01 through ATF-PC-T0502-10
Sample Location:	GE Aviation; Project No.: B0031231.0000.00002
PO No.:	Not provided
ALS Work Order No.:	1305050
ALS Sample Nos.:	1305050-01 through 1305050-10
Sample Receipt Date:	5/2/2013
Preparation Date:	5/2/2013 through 5/3/2013
Analysis Date:	5/3/2013

We certify that the samples indicated on the following data sheet(s) were analyzed by Transmission Electron Microscopy (TEM) for asbestos using the method, EPA/600/R-93/116, Chatfield Method, for determining the amount and type of asbestos present in bulk building materials.

After an initial examination by stereomicroscope to determine homogeneity, friability, matrix material and other characteristics, we prepared the samples using gravimetric reduction. Coarse, non-asbestos materials that cannot be pulverized, such as pebbles or metal foils, were separated from the portion analyzed. Other non-asbestos material was removed by ashing in a muffle furnace and/or dissolution in decalcifying solution. Sample weights were tracked through each step in the reduction.

Analysis was performed on an FEI Tecnai Spirit Twin TEM and EDAX Genesis System using energy dispersive X-ray analysis (EDXA) spectra and selected area electron diffraction (SAED) patterns to determine fiber species. Asbestos percentages are based on a visual estimate of the asbestos percent by area in the final residue and are listed on the following data sheet(s). Results apply only to portions of samples analyzed. ALS Laboratory Group Environmental Division (Cincinnati) will dispose of all bulk samples after 60 days unless other arrangements are made.

Pamela Johnson
Analyst

Shawn Smythe
Project Manager

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ALS Laboratory Group
4388 Glendale-Milford Road, Cincinnati, Ohio 45242
Phone (513) 733 5336 Fax (513) 733 5347 www.alsenviro.com
A Campbell Brothers Limited Company

CLIENT: ARCADIS LEXINGTON
SAMPLE LOCATION: GE Aviation; Project No.: B0031231.0000.00002

ANALYSIS DATA

EDXA Resolution:	133.66 eV	Magnification:	9,800 X
Accelerating Voltage:	100 keV	Calibration Constant:	1 cm = 1.02 μm
		Camera Constant:	129.25 mm-Å

SAMPLE IDENTIFICATION					
Client Sample No.:	ATF-PC-T0502-01	ATF-PC-T0502-02	ATF-PC-T0502-03	ATF-PC-T0502-04	ATF-PC-T0502-05
ALS Sample No.:	1305050-01	1305050-02	1305050-03	1305050-04	1305050-05
SAMPLE DESCRIPTION					
Homogeneity:	Homogeneous	Homogeneous	Homogeneous	Homogeneous	Homogeneous
Color:	Gray	Gray	Gray	Gray	Gray
Texture:	Crumbly	Crumbly	Crumbly	Crumbly	Crumbly
Description:	Paint	Paint	Paint	Paint	Paint
SAMPLE PREP					
Starting Weight (g):	0.0743	0.1014	0.1082	0.1752	0.2803
Residue Weight (g):	0.0327	0.0564	0.0593	0.0957	0.1505
Weight Percent Residue:	44.01	55.62	54.81	54.62	53.69
PERCENT ASBESTOS DETECTED IN RESIDUE					
Chrysotile:	0	0	0	0	0
Amosite:	0	0	0	0	0
Crocidolite:	0	0	0	0	0
Actinolite-Tremolite:	0	0	0	0	0
Anthophyllite:	0	0	0	0	0
TOTAL IN RESIDUE	ND	ND	ND	ND	ND
ASBESTOS PERCENT IN SAMPLE					
	ND	**ND**	**ND**	**ND**	**ND**

ND = None Detected *TRACE = <1%*

Pamela Johnson
Analyst

Shawn Smythe
Project Manager

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Phone (513) 733 5336 Fax (513) 733 5347 www.alsenviro.com
A Campbell Brothers Limited Company

CLIENT: ARCADIS LEXINGTON
SAMPLE LOCATION: GE Aviation; Project No.: B0031231.0000.00002

ANALYSIS DATA

EDXA Resolution:	133.66 eV	Magnification:	9,800 X
Accelerating Voltage:	100 keV	Calibration Constant:	1 cm = 1.02 μm
		Camera Constant:	129.25 mm-Å

SAMPLE IDENTIFICATION					
Client Sample No.:	ATF-PC-T0502-06	ATF-PC-T0502-07	ATF-PC-T0502-08	ATF-PC-T0502-09	ATF-PC-T0502-10
ALS Sample No.:	1305050-06	1305050-07	1305050-08	1305050-09	1305050-10
SAMPLE DESCRIPTION					
Homogeneity:	Homogeneous	Homogeneous	Homogeneous	Homogeneous	Homogeneous
Color:	Gray	Gray	Gray	Gray	Gray
Texture:	Crumbly	Crumbly	Crumbly	Crumbly	Crumbly
Description:	Paint	Paint	Paint	Paint	Paint
SAMPLE PREP					
Starting Weight (g):	0.1687	0.1465	0.1452	0.1467	0.3760
Residue Weight (g):	0.0602	0.1046	0.0833	0.0678	0.3128
Weight Percent Residue:	35.68	71.40	57.37	46.22	83.19
PERCENT ASBESTOS DETECTED IN RESIDUE					
Chrysotile:	0	0	0	0	0
Amosite:	0	0	0	0	0
Crocidolite:	0	0	0	0	0
Actinolite-Tremolite:	0	0	0	0	0
Anthophyllite:	0	0	0	0	0
TOTAL IN RESIDUE	ND	ND	ND	ND	ND
ASBESTOS PERCENT IN SAMPLE					
	ND	**ND**	**ND**	**ND**	**ND**

ND = None Detected *TRACE = <1%*

Pamela Johnson
Analyst

Shawn Smythe
Project Manager

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Phone (513) 733 5336 Fax (513) 733 5347 www.alsenviro.com
A Campbell Brothers Limited Company

ALS Laboratory Group
ANALYTICAL CHEMISTRY & TESTING SERVICES

Submitted To: John Novotny
ARCADIS LEXINGTON
2464 Fortune Drive Siute 100
Lexington KY 40509

REFERENCE DATA	**Asbestos by TEM with Gravimetric Reduction**
Sample Type:	Nonfriable Bulk Material with Organic Binder
Method Reference:	EPA/600/R-93/116, Chatfield Method
Client Sample Nos.:	ATF-PC-TB4-053113
Sample Location:	GE Aviation; Project No.: B0031231.0000
PO No.:	Not provided
ALS Work Order No.:	1305681
ALS Sample Nos.:	1305681-01
Sample Receipt Date:	5/31/2013
Preparation Date:	5/31/2013
Analysis Date:	5/31/2013

We certify that the samples indicated on the following data sheet(s) were analyzed by Transmission Electron Microscopy (TEM) for asbestos using the method, EPA/600/R-93/116, Chatfield Method, for determining the amount and type of asbestos present in bulk building materials.

After an initial examination by stereomicroscope to determine homogeneity, friability, matrix material and other characteristics, we prepared the samples using gravimetric reduction. Coarse, non-asbestos materials that cannot be pulverized, such as pebbles or metal foils, were separated from the portion analyzed. Other non-asbestos material was removed by ashing in a muffle furnace and/or dissolution in decalcifying solution. Sample weights were tracked through each step in the reduction.

Analysis was performed on an FEI Tecnai Spirit Twin TEM and EDAX Genesis System using energy dispersive X-ray analysis (EDXA) spectra and selected area electron diffraction (SAED) patterns to determine fiber species. Asbestos percentages are based on a visual estimate of the asbestos percent by area in the final residue and are listed on the following data sheet(s). Results apply only to portions of samples analyzed. ALS Laboratory Group Environmental Division (Cincinnati) will dispose of all bulk samples after 60 days unless other arrangements are made.

Pamela Johnson
Analyst

Shawn Smythe
Project Manager

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A Campbell Brothers Limited Company

CLIENT: ARCADIS LEXINGTON
SAMPLE LOCATION: GE Aviation; Project No.: B0031231.0000

ANALYSIS DATA

EDXA Resolution:	133.66 eV	Magnification:	9,800 X
Accelerating Voltage:	100 keV	Calibration Constant:	1 cm = 1.02 μm

SAMPLE IDENTIFICATION	
Client Sample No.:	ATF-PC-TB4-053113
ALS Sample No.:	1305681-01
SAMPLE DESCRIPTION	
Homogeneity:	Homogeneous
Color:	Metallic Gray
Texture:	Crumbly
Description:	Paint
SAMPLE PREP	
Starting Weight (g):	0.1095
Residue Weight (g):	0.0590
Weight Percent Residue:	53.88
PERCENT ASBESTOS DETECTED IN RESIDUE	
Chrysotile:	0
Amosite:	0
Crocidolite:	0
Actinolite-Tremolite:	0
Anthophyllite:	0
TOTAL IN RESIDUE	ND
ASBESTOS PERCENT IN SAMPLE	
	ND

ND = None Detected *TRACE = <1%*

Pamela Johnson
Analyst

Shawn Smythe
Project Manager

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Phone (513) 733 5336 Fax (513) 733 5347 www.alsenviro.com
A Campbell Brothers Limited Company

Attachment J

PCB M_L Marker Inspection Logs

ATF PCB'S ML MARKERS

	Location	Date	Time	Comment	Inspector
1	Inlet Stack #1 Door	01/10/2013	1530		AE
2	Inlet Stack #2 Door	01/10/2013			AE
3	Cell 44 Inlet Duct East Side	01/10/2013			AE
4	Cell 44 Dark Side North Door	01/10/2013			AE
5	Cell 44 Dark Side South Door	01/10/2013			AE
6	Cell 44 Slave System East Door	01/10/2013			AE
7	Cell 44 Slave System South Door	01/10/2013			AE
8	Cell 44 Aug. Room South Door	01/10/2013			AE
9	Cell 44 Exhaust Stack Door	01/10/2013			AE
10	Cell 44 Southeast Door (V146)	01/10/2013			AE
11	Bldg. 518 Southwest Door	01/10/2013			AE
12	Bldg. 518 Roll Up Door	01/10/2013			AE
13	Cell 43 Southwest Door (V136)	01/10/2013			AE
14	Cell 43 Exhaust Door	01/10/2013			AE
15	Cell 43 Aug. Room Southwest Door	01/10/2013			AE
16	Cell 43 Slave System South Door	01/10/2013			AE
17	Cell 43 Slave System West Door	01/10/2013			AE
18	Cell 43 Dark Side South Door	01/10/2013			AE
19	Cell 43 Dark Side North Door	01/10/2013			AE
20	Coen Heater	01/10/2013			AE
21	Cell 43 North Personnel Door	01/10/2013			AE
22	Cell 43 North Roll Up Door	01/10/2013			AE
23	Cell 43 South Personnel Door	01/10/2013			AE
24	Cell 43 South Roll Up Door	01/10/2013			AE
25	Cell 44 South Roll Up Door	01/10/2013			AE
26	Cell 44 South Personnel Door	01/10/2013			AE
27	Cell 44 Aug. Camera Door	01/10/2013			AE
28	Cell 44 Aug. Room West Door	01/10/2013			AE
29	Cell 44 Aug. Room Southwest Door	01/10/2013			AE
30	Inlet Stack #3 North Door	01/10/2013			AE
31	Cell 43 Aug. Camera Door	01/10/2013			AE
32	Cell 43 Aug. Room East Side Door	01/10/2013			AE
33	Cell 43 Aug. Room Southeast Door	01/10/2013			AE
34	Cell 44 North Personnel Door	01/10/2013			AE
35	Cell 44 North Roll Up Door	01/10/2013			AE
36	Cell 44 Inlet Hatch	01/10/2013			AE
37	Cell 43 Inlet Hatch	01/10/2013			AE
38	Cell 43 Inlet Duct West Side	01/10/2013			AE
39	Bldg. 518 2nd Floor West Door	01/10/2013			AE
40	Bldg. 517 2nd Floor Stairway East Door	01/10/2013			AE
41	Bldg. 517 2nd Floor Stairway West Door	01/10/2013			AE
42	Bldg. 517 Cell 43 Control Room to Cell Door	01/10/2013			AE
43	Bldg. 517 Cell 44 Control Room to Cell Door	01/10/2013			AE
44	ATF Duct, West Leg to RTF	01/10/2013			AE
45	ATF Duct, North/South Leg-South Section	01/10/2013	In between 15 and 16		AE
46	ATF Duct, North/South Leg-North Section	01/10/2013			AE
47	ATF Duct, Inlet "T"-(V131 & V141)	01/10/2013			AE
48	ATF Duct, FS5, FS5 Discharge Duct	01/10/2013	16:15		AE

ATF PCB ML Marker

Verify each marker is fully intact.
Verify EHS Contact number is legible
Verify PCB ML marker is legible

	Location	Date	Time	Comment	Inspector
1	Inlet Stack #1 Door	2/6/13	07:45		MDC
2	Inlet Stack #2 Door				MDC
3	Cell 44 Inlet Duct East Side				MDC
4	Cell 44 Dark Side North Door				MDC
5	Cell 44 Dark Side South Door				MDC
6	Cell 44 Slave System East Door				MDC
7	Cell 44 Slave System South Door				MDC
8	Cell 44 Aug. Room South Door				MDC
9	Cell 44 Exhaust Stack Door				MDC
10	Cell 44 Southeast Door (V146)				MDC
11	Bldg. 518 Southwest Door				MDC
12	Bldg. 518 Roll Up Door				MDC
13	Cell 43 Southwest Door (V136)				MDC
14	Cell 43 Exhaust Door				MDC
15	Cell 43 Aug. Room Southwest Door				MDC
16	Cell 43 Slave System South Door				MDC
17	Cell 43 Slave System West Door				MDC
18	Cell 43 Dark Side South Door				MDC
19	Cell 43 Dark Side North Door				MDC
20	Coen Heater				MDC
21	Cell 43 North Personnel Door				MDC
22	Cell 43 North Roll Up Door				MDC
23	Cell 43 South Personnel Door				MDC
24	Cell 43 South Roll Up Door				MDC
25	Cell 44 South Roll Up Door				MDC
26	Cell 44 South Personnel Door				MDC
27	Cell 44 Aug. Camera Door				MDC
28	Cell 44 Aug. Room West Door				MDC
29	Cell 44 Aug. Room Southwest Door				MDC
30	Inlet Stack #3 North Door				MDC
31	Cell 43 Aug. Camera Door				MDC
32	Cell 43 Aug. Room East Side Door				MDC
33	Cell 43 Aug. Room Southeast Door				MDC
34	Cell 44 North Personnel Door				MDC
35	Cell 44 North Roll Up Door				MDC
36	Cell 44 Inlet Hatch				MDC
37	Cell 43 Inlet Hatch				MDC
38	Cell 43 Inlet Duct West Side				MDC
39	Bldg. 518 2nd Floor West Door				MDC
40	Bldg. 517 2nd Floor Stairway East Door				MDC
41	Bldg. 517 2nd Floor Stairway West Door				MDC
42	Bldg. 517 Cell 43 Control Room to Cell Door				MDC
43	Bldg. 517 Cell 44 Control Room to Cell Door				MDC
44	ATF Duct, West Leg to RTF				MDC
45	ATF Duct, North/South Leg-South Section				MDC
46	ATF Duct, North/South Leg-North Section				MDC
47	ATF Duct, Inlet "T"-(V131 & V141)				MDC
48	ATF Duct, FS5, FS5 Discharge Duct				MDC
49	Coen Heater Hatch. 517-0-22				MDC

ATF PCB'S ML MARKERS

	Location	Date	Time	Comment	Inspector
1	Inlet Stack #1 Door	3/10/13	0830		M. Cawell
2	Inlet Stack #2 Door				MDC
3	Cell 44 Inlet Duct East Side				MDC
4	Cell 44 Dark Side North Door				MDC
5	Cell 44 Dark Side South Door				MDC
6	Cell 44 Slave System East Door				MDC
7	Cell 44 Slave System South Door				MDC
8	Cell 44 Aug. Room South Door				MDC
9	Cell 44 Exhaust Stack Door				MDC
10	Cell 44 Southeast Door (V146)				MDC
11	Bldg. 518 Southwest Door				MDC
12	Bldg. 518 Roll Up Door				MDC
13	Cell 43 Southwest Door (V136)				MDC
14	Cell 43 Exhaust Door				MDC
15	Cell 43 Aug. Room Southwest Door				MDC
16	Cell 43 Slave System South Door				MDC
17	Cell 43 Slave System West Door				MDC
18	Cell 43 Dark Side South Door				MDC
19	Cell 43 Dark Side North Door				MDC
20	Coen Heater				MDC
21	Cell 43 North Personnel Door				MDC
22	Cell 43 North Roll Up Door				MDC
23	Cell 43 South Personnel Door				MDC
24	Cell 43 South Roll Up Door				MDC
25	Cell 44 South Roll Up Door				MDC
26	Cell 44 South Personnel Door				MDC
27	Cell 44 Aug. Camera Door				MDC
28	Cell 44 Aug. Room West Door				MDC
29	Cell 44 Aug. Room Southwest Door				MDC
30	Inlet Stack #3 North Door				MDC
31	Cell 43 Aug. Camera Door				MDC
32	Cell 43 Aug. Room East Side Door				MDC
33	Cell 43 Aug. Room Southeast Door				MDC
34	Cell 44 North Personnel Door				MDC
35	Cell 44 North Roll Up Door				MDC
36	Cell 44 Inlet Hatch				MDC
37	Cell 43 Inlet Hatch				MDC
38	Cell 43 Inlet Duct West Side				MDC
39	Bldg. 518 2nd Floor West Door				MDC
40	Bldg. 517 2nd Floor Stairway East Door				MDC
41	Bldg. 517 2nd Floor Stairway West Door				MDC
42	Bldg. 517 Cell 43 Control Room to Cell Door			✓	MDC
43	Bldg. 517 Cell 44 Control Room to Cell Door			✓	MDC
44	ATF Duct, West Leg to RTF				MDC
45	ATF Duct, North/South Leg-South Section				MDC
46	ATF Duct, North/South Leg-North Section				MDC
47	ATF Duct, Inlet "T"-(V131 & V141)				MDC
48	ATF Duct, FS5, FS5 Discharge Duct				MDC

ATF PCB ML Marker

Verify each marker is fully intact.
Verify EHS Contact number is legible
Verify PCB ML marker is legible

	Location	Date	Time	Comment	Inspector
1	Inlet Stack #1 Door	4/10/13	0720		MDC
2	Inlet Stack #2 Door				MDC
3	Cell 44 Inlet Duct East Side				MDC
4	Cell 44 Dark Side North Door				MDC
5	Cell 44 Dark Side South Door				MDC
6	Cell 44 Slave System East Door				MDC
7	Cell 44 Slave System South Door				MDC
8	Cell 44 Aug. Room South Door				MDC
9	Cell 44 Exhaust Stack Door				MDC
10	Cell 44 Southeast Door (V146)				MDC
11	Bldg. 518 Southwest Door				MDC
12	Bldg. 518 Roll Up Door				MDC
13	Cell 43 Southwest Door (V136)				MDC
14	Cell 43 Exhaust Door				MDC
15	Cell 43 Aug. Room Southwest Door				MDC
16	Cell 43 Slave System South Door				MDC
17	Cell 43 Slave System West Door				MDC
18	Cell 43 Dark Side South Door				MDC
19	Cell 43 Dark Side North Door				MDC
20	Coen Heater				MDC
21	Cell 43 North Personnel Door				MDC
22	Cell 43 North Roll Up Door				MDC
23	Cell 43 South Personnel Door				MDC
24	Cell 43 South Roll Up Door				MDC
25	Cell 44 South Roll Up Door				MDC
26	Cell 44 South Personnel Door				MDC
27	Cell 44 Aug. Camera Door				MDC
28	Cell 44 Aug. Room West Door				MDC
29	Cell 44 Aug. Room Southwest Door				MDC
30	Inlet Stack #3 North Door				MDC
31	Cell 43 Aug. Camera Door				MDC
32	Cell 43 Aug. Room East Side Door				MDC
33	Cell 43 Aug. Room Southeast Door				MDC
34	Cell 44 North Personnel Door				MDC
35	Cell 44 North Roll Up Door				MDC
36	Cell 44 Inlet Hatch				MDC
37	Cell 43 Inlet Hatch				MDC
38	Cell 43 Inlet Duct West Side				MDC
39	Bldg. 518 2nd Floor West Door				MDC
40	Bldg. 517 2nd Floor Stairway East Door				MDC
41	Bldg. 517 2nd Floor Stairway West Door				MDC
42	Bldg. 517 Cell 43 Control Room to Cell Door				MDC
43	Bldg. 517 Cell 44 Control Room to Cell Door				MDC
44	ATF Duct, West Leg to RTF				MDC
45	ATF Duct, North/South Leg-South Section				MDC
46	ATF Duct, North/South Leg-North Section				MDC
47	ATF Duct, Inlet "T"-(V131 & V141)				MDC
48	ATF Duct, FS5, FS5 Discharge Duct				MDC
49	Coen Heater Hatch. 517-0-22				MDC

ATF PCB ML Marker

Verify each marker is fully intact.
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Verify PCB ML marker is legible

	Location	Date	Time	Comment	Inspector
1	Inlet Stack #1 Door	05/10/13	0900	good	RB
2	Inlet Stack #2 Door				RB
3	Cell 44 Inlet Duct East Side				RB
4	Cell 44 Dark Side North Door				RB
5	Cell 44 Dark Side South Door				RB
6	Cell 44 Slave System East Door				RB
7	Cell 44 Slave System South Door				RB
8	Cell 44 Aug. Room South Door				RB
9	Cell 44 Exhaust Stack Door				RB
10	Cell 44 Southeast Door (V146)				RB
11	Bldg. 518 Southwest Door				RB
12	Bldg. 518 Roll Up Door				RB
13	Cell 43 Southwest Door (V136)				RB
14	Cell 43 Exhaust Door				RB
15	Cell 43 Aug. Room Southwest Door				RB
16	Cell 43 Slave System South Door				RB
17	Cell 43 Slave System West Door				RB
18	Cell 43 Dark Side South Door				RB
19	Cell 43 Dark Side North Door				RB
20	Coen Heater				RB
21	Cell 43 North Personnel Door				RB
22	Cell 43 North Roll Up Door				RB
23	Cell 43 South Personnel Door				RB
24	Cell 43 South Roll Up Door				RB
25	Cell 44 South Roll Up Door				RB
26	Cell 44 South Personnel Door				RB
27	Cell 44 Aug. Camera Door				RB
28	Cell 44 Aug. Room West Door				RB
29	Cell 44 Aug. Room Southwest Door				RB
30	Inlet Stack #3 North Door				RB
31	Cell 43 Aug. Camera Door				RB
32	Cell 43 Aug. Room East Side Door				RB
33	Cell 43 Aug. Room Southeast Door				RB
34	Cell 44 North Personnel Door				RB
35	Cell 44 North Roll Up Door				RB
36	Cell 44 Inlet Hatch				RB
37	Cell 43 Inlet Hatch				RB
38	Cell 43 Inlet Duct West Side				RB
39	Bldg. 518 2nd Floor West Door				RB
40	Bldg. 517 2nd Floor Stairway East Door				RB
41	Bldg. 517 2nd Floor Stairway West Door				RB
42	Bldg. 517 Cell 43 Control Room to Cell Door				RB
43	Bldg. 517 Cell 44 Control Room to Cell Door				RB
44	ATF Duct, West Leg to RTF				RB
45	ATF Duct, North/South Leg-South Section				RB
46	ATF Duct, North/South Leg-North Section				RB
47	ATF Duct, Inlet "T"-(V131 & V141)				RB
48	ATF Duct, FS5, FS5 Discharge Duct				RB
49	Coen Heater Hatch. 517-0-22				RB

ATF PCB ML Marker

Verify each marker is fully intact.
Verify EHS Contact number is legible
Verify PCB ML marker is legible

	Location	Date	Time	Comment	Inspector
1	Inlet Stack #1 Door	6/10/13	1300		MDC
2	Inlet Stack #2 Door				MDC
3	Cell 44 Inlet Duct East Side				MDC
4	Cell 44 Dark Side North Door				MDC
5	Cell 44 Dark Side South Door				MDC
6	Cell 44 Slave System East Door				MDC
7	Cell 44 Slave System South Door				MDC
8	Cell 44 Aug. Room South Door				MDC
9	Cell 44 Exhaust Stack Door				MDC
10	Cell 44 Southeast Door (V146)				MDC
11	Bldg. 518 Southwest Door				MDC
12	Bldg. 518 Roll Up Door				MDC
13	Cell 43 Southwest Door (V136)				MDC
14	Cell 43 Exhaust Door				MDC
15	Cell 43 Aug. Room Southwest Door				MDC
16	Cell 43 Slave System South Door				MDC
17	Cell 43 Slave System West Door				MDC
18	Cell 43 Dark Side South Door				MDC
19	Cell 43 Dark Side North Door				MDC
20	Coen Heater				MDC
21	Cell 43 North Personnel Door				MDC
22	Cell 43 North Roll Up Door				MDC
23	Cell 43 South Personnel Door				MDC
24	Cell 43 South Roll Up Door				MDC
25	Cell 44 South Roll Up Door				MDC
26	Cell 44 South Personnel Door				MDC
27	Cell 44 Aug. Camera Door				MDC
28	Cell 44 Aug. Room West Door				MDC
29	Cell 44 Aug. Room Southwest Door				MDC
30	Inlet Stack #3 North Door				MDC
31	Cell 43 Aug. Camera Door				MDC
32	Cell 43 Aug. Room East Side Door				MDC
33	Cell 43 Aug. Room Southeast Door				MDC
34	Cell 44 North Personnel Door				MDC
35	Cell 44 North Roll Up Door				MDC
36	Cell 44 Inlet Hatch				MDC
37	Cell 43 Inlet Hatch				MDC
38	Cell 43 Inlet Duct West Side				MDC
39	Bldg. 518 2nd Floor West Door				MDC
40	Bldg. 517 2nd Floor Stairway East Door				MDC
41	Bldg. 517 2nd Floor Stairway West Door				MDC
42	Bldg. 517 Cell 43 Control Room to Cell Door				MDC
43	Bldg. 517 Cell 44 Control Room to Cell Door				MDC
44	ATF Duct, West Leg to RTF				MDC
45	ATF Duct, North/South Leg-South Section				MDC
46	ATF Duct, North/South Leg-North Section				MDC
47	ATF Duct, Inlet "T"-(V131 & V141)				MDC
48	ATF Duct, FS5, FS5 Discharge Duct				MDC
49	Coen Heater Hatch. 517-0-22				MDC

ATF PCB ML Marker

Verify each marker is fully intact.
Verify EHS Contact number is legible
Verify PCB ML marker is legible

	Location	Date	Time	Comment	Inspector
1	Inlet Stack #1 Door	7/8/13	0832		MDC
2	Inlet Stack #2 Door				MDC
3	Cell 44 Inlet Duct East Side				MDC
4	Cell 44 Dark Side North Door				MDC
5	Cell 44 Dark Side South Door				MDC
6	Cell 44 Slave System East Door				MDC
7	Cell 44 Slave System South Door				MDC
8	Cell 44 Aug. Room South Door				MDC
9	Cell 44 Exhaust Stack Door				MDC
10	Cell 44 Southeast Door (V146)				MDC
11	Bldg. 518 Southwest Door				MDC
12	Bldg. 518 Roll Up Door				MDC
13	Cell 43 Southwest Door (V136)				MDC
14	Cell 43 Exhaust Door				MDC
15	Cell 43 Aug. Room Southwest Door				MDC
16	Cell 43 Slave System South Door				MDC
17	Cell 43 Slave System West Door				MDC
18	Cell 43 Dark Side South Door				MDC
19	Cell 43 Dark Side North Door				MDC
20	Coen Heater				MDC
21	Cell 43 North Personnel Door				MDC
22	Cell 43 North Roll Up Door				MDC
23	Cell 43 South Personnel Door				MDC
24	Cell 43 South Roll Up Door				MDC
25	Cell 44 South Roll Up Door				MDC
26	Cell 44 South Personnel Door				MDC
27	Cell 44 Aug. Camera Door				MDC
28	Cell 44 Aug. Room West Door				MDC
29	Cell 44 Aug. Room Southwest Door				MDC
30	Inlet Stack #3 North Door				MDC
31	Cell 43 Aug. Camera Door				MDC
32	Cell 43 Aug. Room East Side Door				MDC
33	Cell 43 Aug. Room Southeast Door				MDC
34	Cell 44 North Personnel Door				MDC
35	Cell 44 North Roll Up Door				MDC
36	Cell 44 Inlet Hatch				MDC
37	Cell 43 Inlet Hatch				MDC
38	Cell 43 Inlet Duct West Side				MDC
39	Bldg. 518 2nd Floor West Door				MDC
40	Bldg. 517 2nd Floor Stairway East Door				MDC
41	Bldg. 517 2nd Floor Stairway West Door				MDC
42	Bldg. 517 Cell 43 Control Room to Cell Door				MDC
43	Bldg. 517 Cell 44 Control Room to Cell Door				MDC
44	ATF Duct, West Leg to RTF				MDC
45	ATF Duct, North/South Leg-South Section				MDC
46	ATF Duct, North/South Leg-North Section				MDC
47	ATF Duct, Inlet "T"-(V131 & V141)				MDC
48	ATF Duct, FS5, FS5 Discharge Duct				MDC
49	Coen Heater Hatch. 517-0-22	7/8/13	0955		MDC

ATF PCB ML Marker

Verify each marker is fully intact.
Verify EHS Contact number is legible
Verify PCB ML marker is legible

	Location	Date	Time	Comment	Inspector
1	Inlet Stack #1 Door	8-9-13	0843		MDC
2	Inlet Stack #2 Door				MDC
3	Cell 44 Inlet Duct East Side				MDC
4	Cell 44 Dark Side North Door				MDC
5	Cell 44 Dark Side South Door				MDC
6	Cell 44 Slave System East Door				MDC
7	Cell 44 Slave System South Door				MDC
8	Cell 44 Aug. Room South Door				MDC
9	Cell 44 Exhaust Stack Door				MDC
10	Cell 44 Southeast Door (V146)				MDC
11	Bldg. 518 Southwest Door				MDC
12	Bldg. 518 Roll Up Door				MDC
13	Cell 43 Southwest Door (V136)				MDC
14	Cell 43 Exhaust Door				MDC
15	Cell 43 Aug. Room Southwest Door				MDC
16	Cell 43 Slave System South Door				MDC
17	Cell 43 Slave System West Door				MDC
18	Cell 43 Dark Side South Door				MDC
19	Cell 43 Dark Side North Door				MDC
20	Coen Heater				MDC
21	Cell 43 North Personnel Door				MDC
22	Cell 43 North Roll Up Door				MDC
23	Cell 43 South Personnel Door				MDC
24	Cell 43 South Roll Up Door				MDC
25	Cell 44 South Roll Up Door				MDC
26	Cell 44 South Personnel Door				MDC
27	Cell 44 Aug. Camera Door				MDC
28	Cell 44 Aug. Room West Door				MDC
29	Cell 44 Aug. Room Southwest Door				MDC
30	Inlet Stack #3 North Door				MDC
31	Cell 43 Aug. Camera Door				MDC
32	Cell 43 Aug. Room East Side Door				MDC
33	Cell 43 Aug. Room Southeast Door				MDC
34	Cell 44 North Personnel Door				MDC
35	Cell 44 North Roll Up Door				MDC
36	Cell 44 Inlet Hatch				MDC
37	Cell 43 Inlet Hatch				MDC
38	Cell 43 Inlet Duct West Side				MDC
39	Bldg. 518 2nd Floor West Door				MDC
40	Bldg. 517 2nd Floor Stairway East Door				MDC
41	Bldg. 517 2nd Floor Stairway West Door				MDC
42	Bldg. 517 Cell 43 Control Room to Cell Door				MDC
43	Bldg. 517 Cell 44 Control Room to Cell Door				MDC
44	ATF Duct, West Leg to RTF				MDC
45	ATF Duct, North/South Leg-South Section				MDC
46	ATF Duct, North/South Leg-North Section				MDC
47	ATF Duct, Inlet "T"-(V131 & V141)				MDC
48	ATF Duct, FS5, FS5 Discharge Duct				MDC
49	Coen Heater Hatch. 517-0-22	8-9-13	0927		MDC

ATF PCB ML Marker

Verify each marker is fully intact.
Verify EHS Contact number is legible
Verify PCB ML marker is legible

	Location	Date	Time	Comment	Inspector
1	Inlet Stack #1 Door	9-10-13	0755		MDC
2	Inlet Stack #2 Door				MDC
3	Cell 44 Inlet Duct East Side				MDC
4	Cell 44 Dark Side North Door				MDC
5	Cell 44 Dark Side South Door				MDC
6	Cell 44 Slave System East Door				MDC
7	Cell 44 Slave System South Door				MDC
8	Cell 44 Aug. Room South Door				MDC
9	Cell 44 Exhaust Stack Door				MDC
10	Cell 44 Southeast Door (V146)				MDC
11	Bldg. 518 Southwest Door				MDC
12	Bldg. 518 Roll Up Door				MDC
13	Cell 43 Southwest Door (V136)				MDC
14	Cell 43 Exhaust Door				MDC
15	Cell 43 Aug. Room Southwest Door				MDC
16	Cell 43 Slave System South Door				MDC
17	Cell 43 Slave System West Door				MDC
18	Cell 43 Dark Side South Door				MDC
19	Cell 43 Dark Side North Door				MDC
20	Coen Heater				MDC
21	Cell 43 North Personnel Door				MDC
22	Cell 43 North Roll Up Door				MDC
23	Cell 43 South Personnel Door				MDC
24	Cell 43 South Roll Up Door				MDC
25	Cell 44 South Roll Up Door				MDC
26	Cell 44 South Personnel Door				MDC
27	Cell 44 Aug. Camera Door				MDC
28	Cell 44 Aug. Room West Door				MDC
29	Cell 44 Aug. Room Southwest Door				MDC
30	Inlet Stack #3 North Door				MDC
31	Cell 43 Aug. Camera Door				MDC
32	Cell 43 Aug. Room East Side Door				MDC
33	Cell 43 Aug. Room Southeast Door				MDC
34	Cell 44 North Personnel Door				MDC
35	Cell 44 North Roll Up Door				MDC
36	Cell 44 Inlet Hatch				MDC
37	Cell 43 Inlet Hatch				MDC
38	Cell 43 Inlet Duct West Side				MDC
39	Bldg. 518 2nd Floor West Door				MDC
40	Bldg. 517 2nd Floor Stairway East Door				MDC
41	Bldg. 517 2nd Floor Stairway West Door				MDC
42	Bldg. 517 Cell 43 Control Room to Cell Door				MDC
43	Bldg. 517 Cell 44 Control Room to Cell Door				MDC
44	ATF Duct, West Leg to RTF				MDC
45	ATF Duct, North/South Leg-South Section			ACM - Removed - No Sign -	ARCADI
46	ATF Duct, North/South Leg-North Section			ACM - Removed - No Sign -	ARCADI
47	ATF Duct, Inlet "T"-(V131 & V141)				MDC
48	ATF Duct, FS5, FS5 Discharge Duct				MDC
49	Coen Heater Hatch. 517-0-22				MDC

ATF PCB ML Marker

Verify each marker is fully intact
Verify EHS Contact number is legible
Verify PCB ML marker is legible

	Location	Date	Time	Comment	Inspector
1	Inlet Stack #1 Door	10-7-13	0810	good	JG
2	Inlet Stack #2 Door			good	JG
3	Cell 44 Inlet Duct East Side			✓	JG
4	Cell 44 Dark Side North Door			✓	JG
5	Cell 44 Dark Side South Door			✓	JG
6	Cell 44 Slave System East Door			✓	JG
7	Cell 44 Slave System South Door			✓	JG
8	Cell 44 Aug. Room South Door			✓	JG
9	Cell 44 Exhaust Stack Door			✓	JG
10	Cell 44 Southeast Door (V146)			✓	JG
11	Bldg. 518 Southwest Door			✓	JG
12	Bldg. 518 Roll Up Door			✓	JG
13	Cell 43 Southwest Door (V136)			✓	JG
14	Cell 43 Exhaust Door			✓	JG
15	Cell 43 Aug. Room Southwest Door			✓	JG
16	Cell 43 Slave System South Door			✓	JG
17	Cell 43 Slave System West Door			✓	JG
18	Cell 43 Dark Side South Door			✓	JG
19	Cell 43 Dark Side North Door			✓	JG
20	Coen Heater			✓	JG
21	Cell 43 North Personnel Door			good	JG
22	Cell 43 North Roll Up Door			good	JG
23	Cell 43 South Personnel Door			✓	JG
24	Cell 43 South Roll Up Door			✓	JG
25	Cell 44 South Roll Up Door			✓	JG
26	Cell 44 South Personnel Door			good	JG
27	Cell 44 Aug. Camera Door			✓	JG
28	Cell 44 Aug. Room West Door			✓	JG
29	Cell 44 Aug. Room Southwest Door			✓	JG
30	Inlet Stack #3 North Door			good	MC
31	Cell 43 Aug. Camera Door			✓	JG
32	Cell 43 Aug. Room East Side Door			✓	JG
33	Cell 43 Aug. Room Southeast Door			✓	JG
34	Cell 44 North Personnel Door			✓	JG
35	Cell 44 North Roll Up Door			✓	JG
36	Cell 44 Inlet Hatch			✓	JG
37	Cell 43 Inlet Hatch			good	JG
38	Cell 43 Inlet Duct West Side			✓	JG
39	Bldg. 518 2nd Floor West Door			✓	JG
40	Bldg. 517 2nd Floor Stairway East Door			✓	JG
41	Bldg. 517 2nd Floor Stairway West Door			✓	JG
42	Bldg. 517 Cell 43 Control Room to Cell Door			✓	JG
43	Bldg. 517 Cell 44 Control Room to Cell Door			✓	JG
44	ATF Duct, West Leg to RTF			good	MC
45	ATF Duct, North/South Leg-South Section			Duct under repair	JG
46	ATF Duct, North/South Leg-North Section	10-7-13	0810	good	JG
47	ATF Duct, Inlet "T"-(V131 & V141)			good	JG
48	ATF Duct, FS5, FS5 Discharge Duct			✓	JG
49	Coen Heater Hatch. 517-0-22			good	MC

ATF PCB ML Marker

Verify each marker is fully intact.
Verify EHS Contact number is legible
Verify PCB ML marker is legible

	Location	Date	Time	Comment	Inspector
1	Inlet Stack #1 Door	11-11-13	0845		JG
2	Inlet Stack #2 Door				JG
3	Cell 44 Inlet Duct East Side				JG
4	Cell 44 Dark Side North Door				JG
5	Cell 44 Dark Side South Door				JG
6	Cell 44 Slave System East Door				JG
7	Cell 44 Slave System South Door				JG
8	Cell 44 Aug. Room South Door				JG
9	Cell 44 Exhaust Stack Door				JG
10	Cell 44 Southeast Door (V146)				JG
11	Bldg. 518 Southwest Door				JG
12	Bldg. 518 Roll Up Door				JG
13	Cell 43 Southwest Door (V136)				JG
14	Cell 43 Exhaust Door				JG
15	Cell 43 Aug. Room Southwest Door				JG
16	Cell 43 Slave System South Door				JG
17	Cell 43 Slave System West Door				JG
18	Cell 43 Dark Side South Door				JG
19	Cell 43 Dark Side North Door				JG
20	Coen			REMOVED FOR PAINT REMOVAL	JG
21	Cell 43 North Personnel Door				JG
22	Cell 43 North Roll Up Door				JG
23	Cell 43 South Personnel Door				JG
24	Cell 43 South Roll Up Door				JG
25	Cell 44 South Roll Up Door				JG
26	Cell 44 South Personnel Door				JG
27	Cell 44 Aug. Camera Door				JG
28	Cell 44 Aug. Room West Door				JG
29	Cell 44 Aug. Room Southwest Door				JG
30	Inlet Stack #3 North Door				JG
31	Cell 43 Aug. Camera Door				JG
32	Cell 43 Aug. Room East Side Door				JG
33	Cell 43 Aug. Room Southeast Door				JG
34	Cell 44 North Personnel Door				JG
35	Cell 44 North Roll Up Door				JG
36	Cell 44 Inlet Hatch				JG
37	Cell 43 Inlet Hatch				JG
38	Cell 43 Inlet Duct West Side				JG
39	Bldg. 518 2nd Floor West Door				JG
40	Bldg. 517 2nd Floor Stairway East Door				JG
41	Bldg. 517 2nd Floor Stairway West Door				JG
42	Bldg. 517 Cell 43 Control Room to Cell Door				JG
43	Bldg. 517 Cell 44 Control Room to Cell Door				JG
44	ATF Duct, West Leg to RTF				JG
45	ATF Duct, North/South Leg-South Section			DUCT UNDER REPAIR	JG
46	ATF Duct, North/South Leg-North Section				JG
47	ATF Duct, Inlet "T"-(V131 & V141)				JG
48	ATF Duct, FS5, FS5 Discharge Duct				JG
49	Coen Heater Hatch. 517-0-22	11-11-13	0915		JG

ATF PCB'S ML MARKERS

		Location	Date	Time	Comment	Inspector
*	1	Inlet Stack #1 Door	12-2-13	0740		JG
*	2	Inlet Stack #2 Door				JG
	3	Cell 44 Inlet Duct East Side				JG
	4	Cell 44 Dark Side North Door				JG
	5	Cell 44 Dark Side South Door				JG
	6	Cell 44 Slave System East Door				JG
	7	Cell 44 Slave System South Door				JG
	8	Cell 44 Aug. Room South Door				JG
	9	Cell 44 Exhaust Stack Door				JG
	10	Cell 44 Southeast Door (V146)				JG
	11	Bldg. 518 Southwest Door				JG
	12	Bldg. 518 Roll Up Door				JG
	13	Cell 43 Southwest Door (V136)				JG
	14	Cell 43 Exhaust Door				JG
	15	Cell 43 Aug. Room Southwest Door				JG
	16	Cell 43 Slave System South Door				JG
	17	Cell 43 Slave System West Door				JG
	18	Cell 43 Dark Side South Door				JG
	19	Cell 43 Dark Side North Door				JG
	20	Coen Heater			MARKER REMOVED for	MDC
	21	Cell 43 North Personnel Door			PCB - Paint Removal	JG
	22	Cell 43 North Roll Up Door				JG
	23	Cell 43 South Personnel Door				JG
	24	Cell 43 South Roll Up Door				JG
	25	Cell 44 South Roll Up Door				JG
	26	Cell 44 South Personnel Door				JG
	27	Cell 44 Aug. Camera Door				JG
	28	Cell 44 Aug. Room West Door				JG
	29	Cell 44 Aug. Room Southwest Door				JG
*	30	Inlet Stack #3 North Door				JG
	31	Cell 43 Aug. Camera Door				JG
	32	Cell 43 Aug. Room East Side Door				JG
	33	Cell 43 Aug. Room Southeast Door				JG
	34	Cell 44 North Personnel Door				JG
	35	Cell 44 North Roll Up Door				JG
*	36	Cell 44 Inlet Hatch				JG
*	37	Cell 43 Inlet Hatch				JG
	38	Cell 43 Inlet Duct West Side				JG
	39	Bldg. 518 2nd Floor West Door				JG
	40	Bldg. 517 2nd Floor Stairway East Door				JG
	41	Bldg. 517 2nd Floor Stairway West Door				JG
	42	Bldg. 517 Cell 43 Control Room to Cell Door				JG
	43	Bldg. 517 Cell 44 Control Room to Cell Door				JG
	44	ATF Duct, West Leg to RTF			D~~uct being~~ removed	MDC
	45	ATF Duct, North/South Leg-South Section			Duct being replaced w/SS	MDC
	46	ATF Duct, North/South Leg-North Section			Duct being replaced w/SS	MDC
	47	ATF Duct, Inlet "T"-(V131 & V141)				JG
	48	ATF Duct, FS5, FS5 Discharge Duct				JG
*	49	Coen Heater Hatch, 517-0-22	12-2-13	10:15	Duct replaced with SS	MDC

ATF PCB'S ML MARKERS

	Location	Date	Time	Comment	Inspector
1	Inlet Stack #1 Door	1-6-14	0900	Checks OK	JG
2	Inlet Stack #2 Door				JG
3	Cell 44 Inlet Duct East Side				JG
4	Cell 44 Dark Side North Door				JG
5	Cell 44 Dark Side South Door				JG
6	Cell 44 Slave System East Door				JG
7	Cell 44 Slave System South Door				JG
8	Cell 44 Aug. Room South Door				JG
9	Cell 44 Exhaust Stack Door				JG
10	Cell 44 Southeast Door (V146)				JG
11	Bldg. 518 Southwest Door				JG
12	Bldg. 518 Roll Up Door				JG
13	Cell 43 Southwest Door (V136)				JG
14	Cell 43 Exhaust Door				JG
15	Cell 43 Aug. Room Southwest Door				JG
16	Cell 43 Slave System South Door				JG
17	Cell 43 Slave System West Door				JG
18	Cell 43 Dark Side South Door				JG
19	Cell 43 Dark Side North Door				JG
20	Coen Heater			Temp Removed. for Remediation	JG
21	Cell 43 North Personnel Door			Checks OK	JG
22	Cell 43 North Roll Up Door				JG
23	Cell 43 South Personnel Door				JG
24	Cell 43 South Roll Up Door				JG
25	Cell 44 South Roll Up Door				JG
26	Cell 44 South Personnel Door				JG
27	Cell 44 Aug. Camera Door				JG
28	Cell 44 Aug. Room West Door				JG
29	Cell 44 Aug. Room Southwest Door				JG
30	Inlet Stack #3 North Door				JG
31	Cell 43 Aug. Camera Door				JG
32	Cell 43 Aug. Room East Side Door				JG
33	Cell 43 Aug. Room Southeast Door				JG
34	Cell 44 North Personnel Door				JG
35	Cell 44 North Roll Up Door				JG
36	Cell 44 Inlet Hatch				JG
37	Cell 43 Inlet Hatch				JG
38	Cell 43 Inlet Duct West Side				JG
39	Bldg. 518 2nd Floor West Door				JG
40	Bldg. 517 2nd Floor Stairway East Door				JG
41	Bldg. 517 2nd Floor Stairway West Door				JG
42	Bldg. 517 Cell 43 Control Room to Cell Door				JG
43	Bldg. 517 Cell 44 Control Room to Cell Door				JG
44					JG
45					JG
46					JG
47	ATF Duct, Inlet "T"-(V131 & V141)				JG
48	ATF Duct, FS5 Discharge Duct				JG
49					JG

ATF PCB ML Marker

	Location	Date	Time	Comment	Inspector
1	Inlet Stack #1 Door	2-3-14	0800	Checks good	JG
2	Inlet Stack #2 Door				
3	Cell 44 Inlet Duct East Side				
4	Cell 44 Dark Side North Door				
5	Cell 44 Dark Side South Door				
6	Cell 44 Slave System East Door				
7	Cell 44 Slave System South Door				
8	Cell 44 Aug. Room South Door				
9	Cell 44 Exhaust Stack Door				
10	Cell 44 Southeast Door (V146)				
11	Bldg. 518 Southwest Door				
12	Bldg. 518 Roll Up Door				
13	Cell 43 Southwest Door (V136)				
14	Cell 43 Exhaust Door				
15	Cell 43 Aug. Room Southwest Door				
16	Cell 43 Slave System South Door				
17	Cell 43 Slave System West Door				
18	Cell 43 Dark Side South Door				
19	Cell 43 Dark Side North Door				
20	Coen Heater				
21	Cell 43 North Personnel Door				
22	Cell 43 North Roll Up Door				
23	Cell 43 South Personnel Door				
24	Cell 43 South Roll Up Door				
25	Cell 44 South Roll Up Door				
26	Cell 44 South Personnel Door				
27	Cell 44 Aug. Camera Door				
28	Cell 44 Aug. Room West Door				
29	Cell 44 Aug. Room Southwest Door				
30	Inlet Stack #3 North Door				
31	Cell 43 Aug. Camera Door				
32	Cell 43 Aug. Room East Side Door				
33	Cell 43 Aug. Room Southeast Door				
34	Cell 44 North Personnel Door				
35	Cell 44 North Roll Up Door				
36	Cell 44 Inlet Hatch				
37	Cell 43 Inlet Hatch				
38	Cell 43 Inlet Duct West Side				
39	Bldg. 518 2nd Floor West Door				
40	Bldg. 517 2nd Floor Stairway East Door				
41	Bldg. 517 2nd Floor Stairway West Door				
42	Bldg. 517 Cell 43 Control Room to Cell Door				
43	Bldg. 517 Cell 44 Control Room to Cell Door				
44					
45					
46					
47	ATF Duct, Inlet "T"-(V131 & V141)				
48	ATF Duct, FS5 Discharge Duct				

ATF PCB'S ML MARKERS [redacted]

	Location	Date	Time	Comment	Inspector
1	Inlet Stack #1 Door	03/03/14	1300	Check's OK	JAG
2	Inlet Stack #2 Door				JAG
3	Cell 44 Inlet Duct East Side				JAG
4	Cell 44 Dark Side North Door				JAG
5	Cell 44 Dark Side South Door				JAG
6	Cell 44 Slave System East Door				JAG
7	Cell 44 Slave System South Door				JAG
8	Cell 44 Aug. Room South Door				JAG
9	Cell 44 Exhaust Stack Door				JAG
10	Cell 44 Southeast Door (V146)				JAG
11	Bldg. 518 Southwest Door				JAG
12	Bldg. 518 Roll Up Door				JAG
13	Cell 43 Southwest Door (V136)				JAG
14	Cell 43 Exhaust Door				JAG
15	Cell 43 Aug. Room Southwest Door				JAG
16	Cell 43 Slave System South Door				JAG
17	Cell 43 Slave System West Door				JAG
18	Cell 43 Dark Side South Door				JAG
19	Cell 43 Dark Side North Door				JAG
20	Coen Heater				JAG
21	Cell 43 North Personnel Door				JAG
22	Cell 43 North Roll Up Door				JAG
23	Cell 43 South Personnel Door				JAG
24	Cell 43 South Roll Up Door				JAG
25	Cell 44 South Roll Up Door				JAG
26	Cell 44 South Personnel Door				JAG
27	Cell 44 Aug. Camera Door				JAG
28	Cell 44 Aug. Room West Door				JAG
29	Cell 44 Aug. Room Southwest Door				JAG
30	Inlet Stack #3 North Door				JAG
31	Cell 43 Aug. Camera Door				JAG
32	Cell 43 Aug. Room East Side Door				JAG
33	Cell 43 Aug. Room Southeast Door				JAG
34	Cell 44 North Personnel Door				JAG
35	Cell 44 North Roll Up Door				JAG
36	Cell 44 Inlet Hatch				JAG
37	Cell 43 Inlet Hatch				JAG
38	Cell 43 Inlet Duct West Side				JAG
39	Bldg. 518 2nd Floor West Door				JAG
40	Bldg. 517 2nd Floor Stairway East Door				JAG
41	Bldg. 517 2nd Floor Stairway West Door				JAG
42	Bldg. 517 Cell 43 Control Room to Cell Door				JAG
43	Bldg. 517 Cell 44 Control Room to Cell Door				JAG
44					
45					
46					
47	ATF Duct, Inlet "T"-(V131 & V141)				JAG
48	ATF Duct, FS5 Discharge Duct				JAG
49				[redacted]	

ATF PCB ML Marker

Verify each marker is fully intact.
Verify EHS Contact number is legible
Verify PCB ML marker is legible

	Location	Date	Time	Comment	Inspector
1	Inlet Stack #1 Door	4/8/14	1330	Checks Good	JG
2	Inlet Stack #2 Door				JG
3	Cell 44 Inlet Duct East Side				JG
4	Cell 44 Dark Side North Door				JG
5	Cell 44 Dark Side South Door				JG
6	Cell 44 Slave System East Door				JG
7	Cell 44 Slave System South Door				JG
8	Cell 44 Aug. Room South Door				JG
9	Cell 44 Exhaust Stack Door				JG
10	Cell 44 Southeast Door (V146)				JG
11	Bldg. 518 Southwest Door				JG
12	Bldg. 518 Roll Up Door				JG
13	Cell 43 Southwest Door (V136)				JG
14	Cell 43 Exhaust Door				JG
15	Cell 43 Aug. Room Southwest Door				JG
16	Cell 43 Slave System South Door				JG
17	Cell 43 Slave System West Door				JG
18	Cell 43 Dark Side South Door				JG
19	Cell 43 Dark Side North Door				JG
20	Coen Heater				JG
21	Cell 43 North Personnel Door				JG
22	Cell 43 North Roll Up Door				JG
23	Cell 43 South Personnel Door				JG
24	Cell 43 South Roll Up Door				JG
25	Cell 44 South Roll Up Door				JG
26	Cell 44 South Personnel Door				JG
27	Cell 44 Aug. Camera Door				JG
28	Cell 44 Aug. Room West Door				JG
29	Cell 44 Aug. Room Southwest Door				JG
30	Inlet Stack #3 North Door				JG
31	Cell 43 Aug. Camera Door				JG
32	Cell 43 Aug. Room East Side Door				JG
33	Cell 43 Aug. Room Southeast Door				JG
34	Cell 44 North Personnel Door				JG
35	Cell 44 North Roll Up Door				JG
36	Cell 44 Inlet Hatch				JG
37	Cell 43 Inlet Hatch				JG
38	Cell 43 Inlet Duct West Side				JG
39	Bldg. 518 2nd Floor West Door				JG
40	Bldg. 517 2nd Floor Stairway East Door				JG
41	Bldg. 517 2nd Floor Stairway West Door				JG
42	Bldg. 517 Cell 43 Control Room to Cell Door				JG
43	Bldg. 517 Cell 44 Control Room to Cell Door				JG
44	ATF Duct, West Leg to RTF			Duct removed 11/2013	
45	ATF Duct, North/South Leg-South Section			Duct replaced with S.S.	
46	ATF Duct, North/South Leg-North Section			Duct replaced with S.S.	
47	ATF Duct, Inlet "T"-(V131 & V141)				JG
48	ATF Duct, FS5, FS5 Discharge Duct				JG
49	Coen Heater Hatch. 517-0-22			Duct replaced with S.S.	JG

ATF PCB ML Marker

	Location	Date	Time	Comment	Inspector
1	Inlet Stack #1 Door	5/5/14	1230	Checks OK	JG
2	Inlet Stack #2 Door				JG
3	Cell 44 Inlet Duct East Side				JG
4	Cell 44 Dark Side North Door				JG
5	Cell 44 Dark Side South Door				JG
6	Cell 44 Slave System East Door				JG
7	Cell 44 Slave System South Door				JG
8	Cell 44 Aug. Room South Door				JG
9	Cell 44 Exhaust Stack Door				JG
10	Cell 44 Southeast Door (V146)				JG
11	Bldg. 518 Southwest Door				JG
12	Bldg. 518 Roll Up Door				JG
13	Cell 43 Southwest Door (V136)				JG
14	Cell 43 Exhaust Door				JG
15	Cell 43 Aug. Room Southwest Door				JG
16	Cell 43 Slave System South Door				JG
17	Cell 43 Slave System West Door				JG
18	Cell 43 Dark Side South Door				JG
19	Cell 43 Dark Side North Door				JG
20	Coen Heater				JG
21	Cell 43 North Personnel Door				JG
22	Cell 43 North Roll Up Door				JG
23	Cell 43 South Personnel Door				JG
24	Cell 43 South Roll Up Door				JG
25	Cell 44 South Roll Up Door				JG
26	Cell 44 South Personnel Door				JG
27	Cell 44 Aug. Camera Door				JG
28	Cell 44 Aug. Room West Door				JG
29	Cell 44 Aug. Room Southwest Door				JG
30	Inlet Stack #3 North Door				JG
31	Cell 43 Aug. Camera Door				JG
32	Cell 43 Aug. Room East Side Door				JG
33	Cell 43 Aug. Room Southeast Door				JG
34	Cell 44 North Personnel Door				JG
35	Cell 44 North Roll Up Door				JG
36	Cell 44 Inlet Hatch				JG
37	Cell 43 Inlet Hatch				JG
38	Cell 43 Inlet Duct West Side				JG
39	Bldg. 518 2nd Floor West Door				JG
40	Bldg. 517 2nd Floor Stairway East Door				JG
41	Bldg. 517 2nd Floor Stairway West Door				JG
42	Bldg. 517 Cell 43 Control Room to Cell Door				JG
43	Bldg. 517 Cell 44 Control Room to Cell Door				JG
44					
45					
46					
47	ATF Duct, Inlet "T"-(V131 & V141)				JG
48	ATF Duct, FS5 Discharge Duct				JG
49	Coen Heater Entry Hatch				JG

ATF PCB ML Marker

Verify each marker is fully intact.
Verify EHS Contact number is legible
Verify PCB ML marker is legible

	Location	Date	Time	Comment	Inspector
1	Inlet Stack #1 Door	6/2/14	1130	Check OK	JG
2	Inlet Stack #2 Door				JG
3	Cell 44 Inlet Duct East Side				JG
4	Cell 44 Dark Side North Door				JG
5	Cell 44 Dark Side South Door				JG
6	Cell 44 Slave System East Door				JG
7	Cell 44 Slave System South Door				JG
8	Cell 44 Aug. Room South Door				JG
9	Cell 44 Exhaust Stack Door				JG
10	Cell 44 Southeast Door (V146)				JG
11	Bldg. 518 Southwest Door				JG
12	Bldg. 518 Roll Up Door				JG
13	Cell 43 Southwest Door (V136)				JG
14	Cell 43 Exhaust Door				JG
15	Cell 43 Aug. Room Southwest Door				JG
16	Cell 43 Slave System South Door				JG
17	Cell 43 Slave System West Door				JG
18	Cell 43 Dark Side South Door				JG
19	Cell 43 Dark Side North Door				JG
20	Coen Heater				JG
21	Cell 43 North Personnel Door				JG
22	Cell 43 North Roll Up Door				JG
23	Cell 43 South Personnel Door				JG
24	Cell 43 South Roll Up Door				JG
25	Cell 44 South Roll Up Door				JG
26	Cell 44 South Personnel Door				JG
27	Cell 44 Aug. Camera Door				JG
28	Cell 44 Aug. Room West Door				JG
29	Cell 44 Aug. Room Southwest Door				JG
30	Inlet Stack #3 North Door				JG
31	Cell 43 Aug. Camera Door				JG
32	Cell 43 Aug. Room East Side Door				JG
33	Cell 43 Aug. Room Southeast Door				JG
34	Cell 44 North Personnel Door				JG
35	Cell 44 North Roll Up Door				JG
36	Cell 44 Inlet Hatch				JG
37	Cell 43 Inlet Hatch				JG
38	Cell 43 Inlet Duct West Side				JG
39	Bldg. 518 2nd Floor West Door				JG
40	Bldg. 517 2nd Floor Stairway East Door				JG
41	Bldg. 517 2nd Floor Stairway West Door				JG
42	Bldg. 517 Cell 43 Control Room to Cell Door				JG
43	Bldg. 517 Cell 44 Control Room to Cell Door				JG
44	ATF Duct, West Leg to RTF			Duct removed 11/2013	
45	ATF Duct, North/South Leg-South Section			Duct replaced with S.S.	
46	ATF Duct, North/South Leg-North Section			Duct replaced with S.S.	
47	ATF Duct, Inlet "T"-(V131 & V141)				JG
48	ATF Duct, FS5, FS5 Discharge Duct				JG
49	Coen Heater Hatch. 517-0-22			Duct replaced with S.S.	JG

ATF PCB'S ML MARKERS

	Location	Date	Time	Comment	Inspector
1	Inlet Stack #1 Door	7/1/2014	0130	checks O.K.	JG
2	Inlet Stack #2 Door				JG
3	Cell 44 Inlet Duct East Side				JG
4	Cell 44 Dark Side North Door				JG
5	Cell 44 Dark Side South Door				JG
6	Cell 44 Slave System East Door				JG
7	Cell 44 Slave System South Door				JG
8	Cell 44 Aug. Room South Door				JG
9	Cell 44 Exhaust Stack Door				JG
10	Cell 44 Southeast Door (V146)				JG
11	Bldg. 518 Southwest Door				JG
12	Bldg. 518 Roll Up Door				JG
13	Cell 43 Southwest Door (V136)				JG
14	Cell 43 Exhaust Door				JG
15	Cell 43 Aug. Room Southwest Door				JG
16	Cell 43 Slave System South Door				JG
17	Cell 43 Slave System West Door				JG
18	Cell 43 Dark Side South Door				JG
19	Cell 43 Dark Side North Door				JG
20	Coen Heater				JG
21	Cell 43 North Personnel Door				JG
22	Cell 43 North Roll Up Door				JG
23	Cell 43 South Personnel Door				JG
24	Cell 43 South Roll Up Door				JG
25	Cell 44 South Roll Up Door				JG
26	Cell 44 South Personnel Door				JG
27	Cell 44 Aug. Camera Door				JG
28	Cell 44 Aug. Room West Door				JG
29	Cell 44 Aug. Room Southwest Door				JG
30	Inlet Stack #3 North Door				JG
31	Cell 43 Aug. Camera Door				JG
32	Cell 43 Aug. Room East Side Door				JG
33	Cell 43 Aug. Room Southeast Door				JG
34	Cell 44 North Personnel Door				JG
35	Cell 44 North Roll Up Door				JG
36	Cell 44 Inlet Hatch				JG
37	Cell 43 Inlet Hatch				JG
38	Cell 43 Inlet Duct West Side				JG
39	Bldg. 518 2nd Floor West Door				JG
40	Bldg. 517 2nd Floor Stairway East Door				JG
41	Bldg. 517 2nd Floor Stairway West Door				JG
42	Bldg. 517 Cell 43 Control Room to Cell Door				JG
43	Bldg. 517 Cell 44 Control Room to Cell Door				JG
44	ATF Duct, West Leg to RTF			Duct being removed	
45	ATF Duct, North/South Leg-South Section			Duct being replaced w/SS	
46	ATF Duct, North/South Leg-North Section			Duct being replaced w/SS	
47	ATF Duct, Inlet "T"-(V131 & V141)				JG
48	ATF Duct, FS5, FS5 Discharge Duct				JG
49	Coen Heater Hatch, 517-0-22			Duct replaced with SS	JG

ATF PCB ML Marker

Verify each marker is fully intact.
Verify EHS Contact number is legible
Verify PCB ML marker is legible

	Location	Date	Time	Comment	Inspector
1	Inlet Stack #1 Door	8/11/14	0700	Checks Good	J.G.
2	Inlet Stack #2 Door				JG
3	Cell 44 Inlet Duct East Side				JG
4	Cell 44 Dark Side North Door				JG
5	Cell 44 Dark Side South Door				JG
6	Cell 44 Slave System East Door				JG
7	Cell 44 Slave System South Door				JG
8	Cell 44 Aug. Room South Door				JG
9	Cell 44 Exhaust Stack Door				JG
10	Cell 44 Southeast Door (V146)				JG
11	Bldg. 518 Southwest Door				JG
12	Bldg. 518 Roll Up Door				JG
13	Cell 43 Southwest Door (V136)				JG
14	Cell 43 Exhaust Door				JG
15	Cell 43 Aug. Room Southwest Door				JG
16	Cell 43 Slave System South Door				JG
17	Cell 43 Slave System West Door				JG
18	Cell 43 Dark Side South Door				JG
19	Cell 43 Dark Side North Door				JG
20	Coen Heater				JG
21	Cell 43 North Personnel Door				JG
22	Cell 43 North Roll Up Door				JG
23	Cell 43 South Personnel Door				JG
24	Cell 43 South Roll Up Door				JG
25	Cell 44 South Roll Up Door				JG
26	Cell 44 South Personnel Door				JG
27	Cell 44 Aug. Camera Door				JG
28	Cell 44 Aug. Room West Door				JG
29	Cell 44 Aug. Room Southwest Door				JG
30	Inlet Stack #3 North Door				JG
31	Cell 43 Aug. Camera Door				JG
32	Cell 43 Aug. Room East Side Door				JG
33	Cell 43 Aug. Room Southeast Door				JG
34	Cell 44 North Personnel Door				JG
35	Cell 44 North Roll Up Door				JG
36	Cell 44 Inlet Hatch				JG
37	Cell 43 Inlet Hatch				JG
38	Cell 43 Inlet Duct West Side				JG
39	Bldg. 518 2nd Floor West Door				JG
40	Bldg. 517 2nd Floor Stairway East Door				JG
41	Bldg. 517 2nd Floor Stairway West Door				JG
42	Bldg. 517 Cell 43 Control Room to Cell Door				JG
43	Bldg. 517 Cell 44 Control Room to Cell Door				JG
44	ATF Duct, West Leg to RTF			Duct removed 11/2013	
45	ATF Duct, North/South Leg-South Section			Duct replaced with S.S.	
46	ATF Duct, North/South Leg-North Section			Duct replaced with S.S.	
47	ATF Duct, Inlet "T"-(V131 & V141)				JG
48	ATF Duct, FS5, FS5 Discharge Duct				JG
49	Coen Heater Hatch. 517-0-22			Duct replaced with S.S.	JG

ATF PCB ML Marker

Verify each marker is fully intact.
Verify EHS Contact number is legible
Verify PCB ML marker is legible

	Location	Date	Time	Comment	Inspector
1	Inlet Stack #1 Door	9/4/14	1400	Checks OK	JG
2	Inlet Stack #2 Door				JG
3	Cell 44 Inlet Duct East Side				JG
4	Cell 44 Dark Side North Door				JG
5	Cell 44 Dark Side South Door				JG
6	Cell 44 Slave System East Door				JG
7	Cell 44 Slave System South Door				JG
8	Cell 44 Aug. Room South Door				JG
9	Cell 44 Exhaust Stack Door				JG
10	Cell 44 Southeast Door (V146)				JG
11	Bldg. 518 Southwest Door				JG
12	Bldg. 518 Roll Up Door				JG
13	Cell 43 Southwest Door (V136)				JG
14	Cell 43 Exhaust Door				JG
15	Cell 43 Aug. Room Southwest Door				JG
16	Cell 43 Slave System South Door				JG
17	Cell 43 Slave System West Door				JG
18	Cell 43 Dark Side South Door				JG
19	Cell 43 Dark Side North Door				JG
20	Coen Heater				JG
21	Cell 43 North Personnel Door				JG
22	Cell 43 North Roll Up Door				JG
23	Cell 43 South Personnel Door				JG
24	Cell 43 South Roll Up Door				JG
25	Cell 44 South Roll Up Door				JG
26	Cell 44 South Personnel Door				JG
27	Cell 44 Aug. Camera Door				JG
28	Cell 44 Aug. Room West Door				JG
29	Cell 44 Aug. Room Southwest Door				JG
30	Inlet Stack #3 North Door				JG
31	Cell 43 Aug. Camera Door				JG
32	Cell 43 Aug. Room East Side Door				JG
33	Cell 43 Aug. Room Southeast Door				JG
34	Cell 44 North Personnel Door				JG
35	Cell 44 North Roll Up Door				JG
36	Cell 44 Inlet Hatch				JG
37	Cell 43 Inlet Hatch				JG
38	Cell 43 Inlet Duct West Side				JG
39	Bldg. 518 2nd Floor West Door				JG
40	Bldg. 517 2nd Floor Stairway East Door				JG
41	Bldg. 517 2nd Floor Stairway West Door				JG
42	Bldg. 517 Cell 43 Control Room to Cell Door				JG
43	Bldg. 517 Cell 44 Control Room to Cell Door				JG
44	ATF Duct, West Leg to RTF			Duct removed 11/2013	
45	ATF Duct, North/South Leg-South Section			Duct replaced with S.S.	
46	ATF Duct, North/South Leg-North Section			Duct replaced with S.S.	
47	ATF Duct, Inlet "T"-(V131 & V141)				JG
48	ATF Duct, FS5, FS5 Discharge Duct				JG
49	Coen Heater Hatch. 517-0-22			Duct replaced with S.S.	JG

ATF PCB ML Marker

- Verify each marker is fully intact.
Verify EHS Contact number is legible
Verify PCB ML marker is legible

	Location	Date	Time	Comment	Inspector
1	Inlet Stack #1 Door	07OCT14	0855	PLACARDS CHECK OK	BLP
2	Inlet Stack #2 Door				
3	Cell 44 Inlet Duct East Side				
4	Cell 44 Dark Side North Door				
5	Cell 44 Dark Side South Door				
6	Cell 44 Slave System East Door				
7	Cell 44 Slave System South Door				
8	Cell 44 Aug. Room South Door				
9	Cell 44 Exhaust Stack Door				
10	Cell 44 Southeast Door (V146)				
11	Bldg. 518 Southwest Door				
12	Bldg. 518 Roll Up Door				
13	Cell 43 Southwest Door (V136)				
14	Cell 43 Exhaust Door				
15	Cell 43 Aug. Room Southwest Door				
16	Cell 43 Slave System South Door				
17	Cell 43 Slave System West Door				
18	Cell 43 Dark Side South Door				
19	Cell 43 Dark Side North Door				
20	Coen Heater				
21	Cell 43 North Personnel Door				
22	Cell 43 North Roll Up Door				
23	Cell 43 South Personnel Door				
24	Cell 43 South Roll Up Door				
25	Cell 44 South Roll Up Door				
26	Cell 44 South Personnel Door				
27	Cell 44 Aug. Camera Door				
28	Cell 44 Aug. Room West Door				
29	Cell 44 Aug. Room Southwest Door				
30	Inlet Stack #3 North Door				
31	Cell 43 Aug. Camera Door				
32	Cell 43 Aug. Room East Side Door				
33	Cell 43 Aug. Room Southeast Door				
34	Cell 44 North Personnel Door				
35	Cell 44 North Roll Up Door				
36	Cell 44 Inlet Hatch				
37	Cell 43 Inlet Hatch				
38	Cell 43 Inlet Duct West Side				
39	Bldg. 518 2nd Floor West Door				
40	Bldg. 517 2nd Floor Stairway East Door				
41	Bldg. 517 2nd Floor Stairway West Door				
42	Bldg. 517 Cell 43 Control Room to Cell Door				
43	Bldg. 517 Cell 44 Control Room to Cell Door				
44	ATF Duct, West Leg to RTF			Duct removed 11/2013	
45	ATF Duct, North/South Leg-South Section			Duct replaced with S.S.	
46	ATF Duct, North/South Leg-North Section			Duct replaced with S.S.	
47	ATF Duct, Inlet "T"-(V131 & V141)				
48	ATF Duct, FS5, FS5 Discharge Duct				
49	Coen Heater Hatch. 517-0-22			Duct replaced with S.S.	

ATF PCB ML Marker

Verify each marker is fully intact.
Verify EHS Contact number is legible
Verify PCB ML marker is legible

	Location	Date	Time	Comment	Inspector
1	Inlet Stack #1 Door	05 Nov 2014	0702	PLACARDS CHECK OK	BLP
2	Inlet Stack #2 Door				
3	Cell 44 Inlet Duct East Side				
4	Cell 44 Dark Side North Door				
5	Cell 44 Dark Side South Door				
6	Cell 44 Slave System East Door				
7	Cell 44 Slave System South Door				
8	Cell 44 Aug. Room South Door				
9	Cell 44 Exhaust Stack Door				
10	Cell 44 Southeast Door (V146)				
11	Bldg. 518 Southwest Door				
12	Bldg. 518 Roll Up Door				
13	Cell 43 Southwest Door (V136)				
14	Cell 43 Exhaust Door				
15	Cell 43 Aug. Room Southwest Door				
16	Cell 43 Slave System South Door				
17	Cell 43 Slave System West Door				
18	Cell 43 Dark Side South Door				
19	Cell 43 Dark Side North Door				
20	Coen Heater				
21	Cell 43 North Personnel Door				
22	Cell 43 North Roll Up Door				
23	Cell 43 South Personnel Door				
24	Cell 43 South Roll Up Door				
25	Cell 44 South Roll Up Door				
26	Cell 44 South Personnel Door				
27	Cell 44 Aug. Camera Door				
28	Cell 44 Aug. Room West Door				
29	Cell 44 Aug. Room Southwest Door				
30	Inlet Stack #3 North Door				
31	Cell 43 Aug. Camera Door				
32	Cell 43 Aug. Room East Side Door				
33	Cell 43 Aug. Room Southeast Door				
34	Cell 44 North Personnel Door				
35	Cell 44 North Roll Up Door				
36	Cell 44 Inlet Hatch				
37	Cell 43 Inlet Hatch				
38	Cell 43 Inlet Duct West Side				
39	Bldg. 518 2nd Floor West Door				
40	Bldg. 517 2nd Floor Stairway East Door				
41	Bldg. 517 2nd Floor Stairway West Door				
42	Bldg. 517 Cell 43 Control Room to Cell Door				
43	Bldg. 517 Cell 44 Control Room to Cell Door				
44	ATF Duct, West Leg to RTF			Duct removed 11/2013	
45	ATF Duct, North/South Leg-South Section			Duct replaced with S.S.	
46	ATF Duct, North/South Leg-North Section			Duct replaced with S.S.	
47	ATF Duct, Inlet "T"-(V131 & V141)				
48	ATF Duct, FS5, FS5 Discharge Duct			CANNOT VIEW (ARCADIS TENT)	
49	Coen Heater Hatch. 517-0-22	05 Nov 2014	0702	Duct replaced with S.S.	BLP

ATF PCB ML Marker

Verify each marker is fully intact.
Verify EHS Contact number is legible
Verify PCB ML marker is legible

	Location	Date	Time	Comment	Inspector
1	Inlet Stack #1 Door	04DEC14	0800	PLACARDS CHECK OK	BLP
2	Inlet Stack #2 Door				
3	Cell 44 Inlet Duct East Side				
4	Cell 44 Dark Side North Door				
5	Cell 44 Dark Side South Door				
6	Cell 44 Slave System East Door				
7	Cell 44 Slave System South Door				
8	Cell 44 Aug. Room South Door				
9	Cell 44 Exhaust Stack Door				
10	Cell 44 Southeast Door (V146)				
11	Bldg. 518 Southwest Door				
12	Bldg. 518 Roll Up Door				
13	Cell 43 Southwest Door (V136)				
14	Cell 43 Exhaust Door				
15	Cell 43 Aug. Room Southwest Door				
16	Cell 43 Slave System South Door				
17	Cell 43 Slave System West Door				
18	Cell 43 Dark Side South Door				
19	Cell 43 Dark Side North Door				
20	Coen Heater				
21	Cell 43 North Personnel Door				
22	Cell 43 North Roll Up Door				
23	Cell 43 South Personnel Door				
24	Cell 43 South Roll Up Door				
25	Cell 44 South Roll Up Door				
26	Cell 44 South Personnel Door				
27	Cell 44 Aug. Camera Door				
28	Cell 44 Aug. Room West Door				
29	Cell 44 Aug. Room Southwest Door				
30	Inlet Stack #3 North Door				
31	Cell 43 Aug. Camera Door				
32	Cell 43 Aug. Room East Side Door				
33	Cell 43 Aug. Room Southeast Door				
34	Cell 44 North Personnel Door				
35	Cell 44 North Roll Up Door				
36	Cell 44 Inlet Hatch				
37	Cell 43 Inlet Hatch				
38	Cell 43 Inlet Duct West Side				
39	Bldg. 518 2nd Floor West Door				
40	Bldg. 517 2nd Floor Stairway East Door				
41	Bldg. 517 2nd Floor Stairway West Door				
42	Bldg. 517 Cell 43 Control Room to Cell Door				
43	Bldg. 517 Cell 44 Control Room to Cell Door				
44	ATF Duct, West Leg to RTF			Duct removed 11/2013	
45	ATF Duct, North/South Leg-South Section			Duct replaced with S.S.	
46	ATF Duct, North/South Leg-North Section			Duct replaced with S.S.	
47	ATF Duct, Inlet "T"-(V131 & V141)				
48	ATF Duct, FS5, FS5 Discharge Duct				
49	Coen Heater Hatch. 517-0-22	04DEC14	0800	Duct replaced with S.S.	BLP

Attachment K

Waste Disposal Records

1. Scrap Metal Recycling Records
2. PCB Bulk Waste
3. PCB-ACM Waste

1. Scrap Metal Recycling Records

Date: April 10, 2014

BILL OF LADING

SHIP FROM

Name: GE Aviation - c/o ARCADIS
Address: One Neumann Way
City/State/Zip: Evendale, OH 45215
SID#:
FOB: ☐

Bill of Lading Number: 04-10-2014A

BAR CODE SPACE

SHIP TO

Name: Omnisource Corporation
Location #:
Address: 1610 East 4th St
City/State/Zip: Lima, OH 45802
CID#:
FOB: ☐

CARRIER NAME: Piper Trucking
Trailer number: 10329
Seal number(s): —

SCAC:
Pro number:

BAR CODE SPACE

THIRD PARTY FREIGHT CHARGES BILL TO:

Name:
Address:
City/State/Zip:

Freight Charge Terms:
Prepaid _____ Collect _____ 3rd Party _____

☐ (check box) Master Bill of Lading: with attached underlying Bills of Lading

SPECIAL INSTRUCTIONS:

Omnisource Covers Freight Charge

CUSTOMER ORDER INFORMATION

CUSTOMER ORDER NUMBER	# PKGS	WEIGHT	PALLET/SLIP Y	or N	ADDITIONAL SHIPPER INFO
Scrap steel - PCBs< 50ppm	1 60yrd roll-off	TBD			
GRAND TOTAL					

CARRIER INFORMATION

HANDLING UNIT QTY	HANDLING UNIT TYPE	PACKAGE QTY	PACKAGE TYPE	WEIGHT	H.M. (X)	COMMODITY DESCRIPTION (Commodities requiring special or additional care or attention in handling or stowing must be so marked and packaged as to ensure safe transportation with ordinary care. *See Section 2(e) of NMFC Item 360*)	LTL ONLY NMFC #	LTL ONLY CLASS
							RECEIVING	
							STAMP SPACE	
						GRAND TOTAL		

Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property as follows:

"The agreed or declared value of the property is specifically stated by the shipper to be not exceeding _____ per _____."

COD Amount: $_____

Fee Terms: Collect: ☐ Prepaid: ☐
Customer check acceptable: ☐

NOTE Liability Limitation for loss or damage in this shipment may be applicable. See 49 U.S.C. - 14706(c)(1)(A) and (B).

RECEIVED, subject to individually determined rates or contracts that have been agreed upon in writing between the carrier and shipper, if applicable, otherwise to the rates, classifications and rules that have been established by the carrier and are available to the shipper, on request, and to all applicable state and federal regulations.

The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Shipper Signature

SHIPPER SIGNATURE / DATE

This is to certify that the above named materials are properly classified, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the DOT. All cargo tendered for transport is subject to inspection. By tendering cargo to carrier, shipper grants consent to such an inspection.

Trailer Loaded:
☒ By Shipper
☐ By Driver

Freight Counted:
☐ By Shipper
☐ By Driver/pallets said to contain
☒ By Driver/Pieces Omnisource

CARRIER SIGNATURE / PICKUP DATE

Carrier acknowledges receipt of packages and required placards. Carrier certifies emergency response information was made available and/or carrier has the DOT emergency response guidebook or equivalent documentation in the vehicle.

Ticket # TDFQZN

** Classification Ticket **

PURCHASE TICKET

OMNI - ST. MARY'S
4575 CR 33A
ST. MARY'S, OH 45885

Ticket # TDFQZN
Vehicle ID: .1

Date: 04/10/14
Ship Date: 04/10/14

Y: TK .01

Purchased From: ARC129
ARCADIS JS INC
630 PLAZA DR STE 200
HIGHLANDS RANCH, CO 80129-2379

Order # 23915-01 Supplier SO # B0031335.2013

Carrier: ZPIP01 - PIPER TRUCKING & LEA OTM Ref # 20140410-0570

	Gross	Tare	Net	Adj	Pd Wt
WEIGHT:	78260a	51420a	26840	0	26840

RECEIVED AS: 1601 UNPREPARED P&S

INSPECTED AS: _____

MATERIAL CONTAMINATED WITH: _____

INSPECTED BY: _____

Gross Wght Date/Time 04/10/14 13:42
Tare Wght Date/Time 04/10/14 14:03

GROSS TONS
11.9821

Thank You For Choosing OmniSource.

1

Date: April 11, 2014

BILL OF LADING

SHIP FROM

Name: GE Aviation - c/o ARCADIS
Address: One Neumann Way
City/State/Zip: Evendale, OH 45215
SID#:
FOB: ☐

Bill of Lading Number: 04-11-2014A

BAR CODE SPACE

SHIP TO

Name: Omnisource - St. Mary's Division
Location #:
Address: 4575 County Road 33A
City/State/Zip: St, Marys, OH 45885
CID#:
FOB: ☐

CARRIER NAME: Piper Trucking
Trailer number: 10329
Seal number(s):

SCAC:
Pro number:

BAR CODE SPACE

THIRD PARTY FREIGHT CHARGES BILL TO:

Name:
Address:
City/State/Zip:

Freight Charge Terms:
Prepaid _____ Collect _____ 3rd Party _____

☐ (check box) Master Bill of Lading: with attached underlying Bills of Lading

SPECIAL INSTRUCTIONS:

Omnisource covers freight charge

CUSTOMER ORDER INFORMATION

CUSTOMER ORDER NUMBER	# PKGS	WEIGHT	PALLET/SLIP Y	or N	ADDITIONAL SHIPPER INFO
Scrap steel - PCB<50ppm	1	TBD			60 CY roll off
GRAND TOTAL					

CARRIER INFORMATION

HANDLING UNIT QTY	HANDLING UNIT TYPE	PACKAGE QTY	PACKAGE TYPE	WEIGHT	H.M. (X)	COMMODITY DESCRIPTION (Commodities requiring special or additional care or attention in handling or stowing must be so marked and packaged as to ensure safe transportation with ordinary care. *See Section 2(e) of NMFC Item 360*)	LTL ONLY NMFC #	LTL ONLY CLASS
							RECEIVING	
							STAMP SPACE	
						GRAND TOTAL		

Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property as follows:

"The agreed or declared value of the property is specifically stated by the shipper to be not exceeding _____ per _____."

COD Amount: $_____

Fee Terms: Collect: ☐ Prepaid: ☐
Customer check acceptable: ☐

NOTE Liability Limitation for loss or damage in this shipment may be applicable. See 49 U.S.C. - 14706(c)(1)(A) and (B).

RECEIVED, subject to individually determined rates or contracts that have been agreed upon in writing between the carrier and shipper, if applicable, otherwise to the rates, classifications and rules that have been established by the carrier and are available to the shipper, on request, and to all applicable state and federal regulations.

The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Shipper Signature

SHIPPER SIGNATURE / DATE

This is to certify that the above named materials are properly classified, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the DOT. All cargo tendered for transport is subject to inspection. By tendering cargo to carrier, shipper grants consent to such an inspection.

Trailer Loaded:
☑ By Shipper
☐ By Driver

Freight Counted:
☐ By Shipper
☐ By Driver/pallets said to contain
☑ By Driver/Pieces

CARRIER SIGNATURE / PICKUP DATE

Carrier acknowledges receipt of packages and required placards. Carrier certifies emergency response information was made available and/or carrier has the DOT emergency response guidebook or equivalent documentation in the vehicle.

Ticket # TDFUKJ

** Classification Ticket **

PURCHASE TICKET

OMNI - ST. MARY'S
4575 CR 33A
ST. MARY'S, OH 45885

Date: 04/11/14
Ship Date: 04/11/14

Ticket # TDFUKJ
Vehicle ID: 01Piper

Y: TK 1301

Purchased From: ARC129
ARCADIS JS INC
630 PLAZA DR STE 200
HIGHLANDS RANCH, CO 80129-2379

Supplier SO # B0031335.2013

Order # 23915-01

Carrier: ZPIP01 - PIPER TRUCKING & LEA OTM Ref # 20140411-0562

	Gross	Tare	Net	Adj	Pd Wt
WEIGHT:	76500a	51680a	24820	0	24820

RECEIVED AS: 1601 UNPREPARED P&S

INSPECTED AS: _____

MATERIAL CONTAMINATED WITH: _____

INSPECTED BY: _____

Gross Mght Date/Time 04/11/14 11:42
Tare Mght Date/Time 04/11/14 12:01

GROSS TONS
11.0804

Thank You For Choosing OmniSource.

01piper

Date:

BILL OF LADING

SHIP FROM

Name: GE Aviation - c/o ARCADIS
Address: One Neumann Way
City/State/Zip: Evandale, OH 45215
SID#:
FOB: ☐

Bill of Lading Number: 05-07-2014A

BAR CODE SPACE

SHIP TO

Name: Omnisource Corporation
Location #:
Address: 4575 County Road 33A
City/State/Zip: St. Marys, OH 45885
CID#:
FOB: ☐

CARRIER NAME: Piper Trucking
Trailer number: 10323
Seal number(s):

SCAC:
Pro number:

BAR CODE SPACE

THIRD PARTY FREIGHT CHARGES BILL TO:

Name:
Address:
City/State/Zip:

Freight Charge Terms:
Prepaid _____ Collect _____ 3rd Party _____

☐ (check box) Master Bill of Lading: with attached underlying Bills of Lading

SPECIAL INSTRUCTIONS:
Omnisource covers freight charge

CUSTOMER ORDER INFORMATION

CUSTOMER ORDER NUMBER	# PKGS	WEIGHT	PALLET/SLIP Y or N	ADDITIONAL SHIPPER INFO
Scrap steel - PCBs <50ppm	1	~~TBD~~ 79560		60 CY roll off
GRAND TOTAL				

CARRIER INFORMATION

HANDLING UNIT QTY	HANDLING UNIT TYPE	PACKAGE QTY	PACKAGE TYPE	WEIGHT	H.M. (X)	COMMODITY DESCRIPTION (Commodities requiring special or additional care or attention in handling or stowing must be so marked and packaged as to ensure safe transportation with ordinary care. *See Section 2(e) of NMFC Item 360*)	LTL ONLY NMFC #	LTL ONLY CLASS
						GRAND TOTAL		

RECEIVING STAMP SPACE

Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property as follows:

"The agreed or declared value of the property is specifically stated by the shipper to be not exceeding

per .*

COD Amount: $

Fee Terms: Collect: ☐ Prepaid: ☐
Customer check acceptable: ☐

NOTE Liability Limitation for loss or damage in this shipment may be applicable. See 49 U.S.C. - 14706(c)(1)(A) and (B).

RECEIVED, subject to individually determined rates or contracts that have been agreed upon in writing between the carrier and shipper, if applicable, otherwise to the rates, classifications and rules that have been established by the carrier and are available to the shipper, on request, and to all applicable state and federal regulations.

The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Shipper Signature

SHIPPER SIGNATURE / DATE

This is to certify that the above named materials are properly classified, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the DOT. All cargo tendered for transport is subject to inspection. By tendering cargo to carrier, shipper grants consent to such an inspection.

Trailer Loaded:
☑ By Shipper
☐ By Driver

Freight Counted:
☐ By Shipper
☐ By Driver/pallets said to contain
☑ By Driver/Pieces

CARRIER SIGNATURE / PICKUP DATE

Carrier acknowledges receipt of packages and required placards. Carrier certifies emergency response information was made available and/or carrier has the DOT emergency response guidebook or equivalent documentation in the vehicle.

4/7/14

Ticket # TDJJYE

** TICKET REPRINT on 05/08/14 **

PURCHASE TICKET

OMNI - ST. MARY'S
4575 CR 33A
ST. MARY'S, OH 45885

BR 37 TS CNTRL NO.: 37 51632

Ticket # TDJJYE
Vehicle ID: 1 PIPER.

Ship Date: 05/07/14

Y: TK 1

Purchased From: ARC129
ARCADIS JS INC
630 PLAZA DR STE 200
HIGHLANDS RANCH, CO 80129-2379

Order # 23915-01 Supplier SO # B0031335.2013

Carrier: ZPIP01 - PIPER TRUCKING & LEA OTM Ref # 20140507-0423

Itm	Shpmnt	Material	Pounds Gross	Tare	Net	Adj	Pd Wt
1.	181745	UNPREPARED P&S 1601	79480a	53420a	26060	0	26060
Totals					26060	0	26060

Gross Wght Date/Time 05/07/14 15:11
Tare Wght Date/Time 05/07/14 15:29

GROSS TONS
11.6339

All weights are reported in Pounds unless otherwise indicated
"m" Represents a manually entered weight

Seller certifies that, except for those items noted on the inspection ticket, delivered material does not contain any of the following, Prohibited and/or Environmenatally Sensitive materials.

Prohibited Materials:
* Crushed vehicles containing batteries, accessible mercury switches, air conditioning units with Refrigerant, or excessive residual fluids (e.g. motor oil, transmission fluid, radiator coolant, etc.)
* Hazardous Materials, Hazardous Waste, or their containers
* Compressed gas cylinders and propane tanks that have not been properly vented and depressurized.
* Radioactive Material.
* Asbestos-Containing Material.

With respect to any goods that previously contained refrigerant, Seller certifies that prior to delivery of such goods to OmniSource, all Refrigerants that had not leaked previously were removed from the goods in accordance with the procedures described in 40 C.F.R., 82.156(g) or (h), as applicable, and in full compliance with applicable federal, state and local laws and regulations.

The Seller further agrees to indemnify and hold OmniSource Corporation and its subsidiaries harmless from any claim, penalty, fine, costs, attorney fees, or other liability resulting in whole or inpart from Seller's breach of this certification.

As the seller of this scrap metal; by signing this statement I am indicating that either I am the owner of this material, or otherwise authorized to sell this material to this dealer by noting the information below.

I attest to the lack of any criminal convictions involving the theft, conversion, or sale of any materials.

Street:_____
(Where was the material located prior to being brought in for sale)

City:_____State:_____

Date:

BILL OF LADING

SHIP FROM

Name: GE Aviation - c/o ARCADIS
Address: One Neumann Way
City/State/Zip: Evandale, OH 45215
SID#:
FOB: ☐

Bill of Lading Number: 05-13-2014A

BAR CODE SPACE

SHIP TO

Name: Omnisource Corporation
Location #:
Address: 4575 County Road 33A
City/State/Zip: St. Mary's, OH 45885
CID#:
FOB: ☐

CARRIER NAME: Piper Trucking
Trailer number: 10686
Seal number(s):

SCAC:
Pro number:

BAR CODE SPACE

THIRD PARTY FREIGHT CHARGES BILL TO:

Name:
Address:
City/State/Zip:

Freight Charge Terms:
Prepaid _____ Collect _____ 3rd Party _____

☐ (check box) Master Bill of Lading: with attached underlying Bills of Lading

SPECIAL INSTRUCTIONS:
Omnisource covers freight charge

CUSTOMER ORDER INFORMATION

CUSTOMER ORDER NUMBER	# PKGS	WEIGHT	PALLET/SLIP Y or N	ADDITIONAL SHIPPER INFO
Scrap Steel - PCBs <50ppm	1	76,500 Gross	3 pm	40 3 pm CY roll off
GRAND TOTAL				

CARRIER INFORMATION

HANDLING UNIT QTY	HANDLING UNIT TYPE	PACKAGE QTY	PACKAGE TYPE	WEIGHT	H.M. (X)	COMMODITY DESCRIPTION Commodities requiring special or additional care or attention in handling or stowing must be so marked and packaged as to ensure safe transportation with ordinary care. *See Section 2(e) of NMFC Item 360*	LTL ONLY NMFC #	LTL ONLY CLASS
						GRAND TOTAL		

RECEIVING STAMP SPACE

Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property as follows:

"The agreed or declared value of the property is specifically stated by the shipper to be not exceeding _____ per _____."

COD Amount: $_____

Fee Terms: Collect: ☐ Prepaid: ☐
Customer check acceptable: ☐

NOTE Liability Limitation for loss or damage in this shipment may be applicable. See 49 U.S.C. - 14706(c)(1)(A) and (B).

RECEIVED, subject to individually determined rates or contracts that have been agreed upon in writing between the carrier and shipper, if applicable, otherwise to the rates, classifications and rules that have been established by the carrier and are available to the shipper, on request, and to all applicable state and federal regulations.

The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

Timonk **Shipper Signature**

SHIPPER SIGNATURE / DATE
This is to certify that the above named materials are properly classified, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the DOT. All cargo tendered for transport is subject to inspection. By tendering cargo to carrier, shipper grants consent to such an inspection.

Trailer Loaded:
☑ By Shipper
☐ By Driver

Freight Counted:
☐ By Shipper
☐ By Driver/pallets said to contain
☑ By Driver/Pieces

CARRIER SIGNATURE / PICKUP DATE
Carrier acknowledges receipt of packages and required placards. Carrier certifies emergency response information was made available and/or carrier has the DOT emergency response guidebook or equivalent documentation in the vehicle.

5/13/14

Ticket # TDKEKO

** TICKET REPRINT on 05/14/14 **

PURCHASE TICKET

OMNI - ST. MARY'S
4575 CR 33A
ST. MARY'S, OH 45885

BR 37 TS CNTRL NO.: 37 52099

Ticket # TDKEKO
Vehicle ID: 01

Ship Date: 05/13/14

Vehicle No: TK TDKEKO

Purchased From: ARC129
ARCADIS JS INC
630 PLAZA DR STE 200
HIGHLANDS RANCH, CO 80129-2379

Order # 23915-01 Supplier SO # B0031335.2013

Carrier: ZPIP01 - PIPER TRUCKING & LEA OTM Ref # 20140512-1089

Itm	Shpmnt	Material	Pounds Gross	Tare	Net	Adj	Pd Wt
1.	1S9913	UNPREPARED P&S 1601	76080a	50860a	25220	0	25220
Totals					25220	0	25220

Gross Wght Date/Time 05/13/14 13:01
Tare Wght Date/Time 05/13/14 13:25

All weights are reported in Pounds unless otherwise indicated
"m" Represents a manually entered weight

Seller certifies that, except for those items noted on the Inspection ticket, delivered material does not contain any of the following, Prohibited and/or Environmenatally Sensitive materials.

Prohibited Materials:
* Crushed vehicles containing batteries, accessible mercury switches, air conditioning units with Refrigerant, or excessive residual fluids (e.g. motor oil, transmission fluid, radiator coolant, etc.)
* Hazardous Materials, Hazardous Waste, or their containers
* Compressed gas cylinders and propane tanks that have not been properly vented and depressurized.
* Radioactive Material.
* Asbestos-Containing Material.

With respect to any goods that previously contained refrigerant, Seller certifies that prior to delivery of such goods to OmniSource, all Refrigerants that had not leaked previously were removed from the goods in accordance with the procedures described in 40 C.F.R., 82.156(g) or (h), as applicable, and in full compliance with applicable federal, state and local laws and regulations.

The Seller further agrees to indemnify and hold OmniSource Corporation and its subsidiaries harmless from any claim, penalty, fine, costs, attorney fees, or other liability resulting in whole or inpart from Seller's breach of this certification.

As the seller of this scrap metal; by signing this statement I am indicating that either I am the owner of this material, or otherwise authorized to sell this material to this dealer by noting the information below.

I attest to the lack of any criminal convictions involving the theft, conversion, or sale of any materials.

Street:_____
(Where was the material located prior to being brought in for sale)

City:_____State:_____

Driver Name:

Date: 5-15-2014

BILL OF LADING

SHIP FROM

Name: GE Aviation - c/o ARCADIS
Address: One Neumann Way
City/State/Zip: Evandale, OH 45215
SID#:
FOB: ☐

Bill of Lading Number: 05-15-2014A

BAR CODE SPACE

SHIP TO

Name: Omnisource Corporation
Location #:
Address: 4575 County Road 33A
City/State/Zip: St. Mary's, OH 45885
CID#:
FOB: ☐

CARRIER NAME: Piper Trucking
Trailer number: 10347
Seal number(s):

SCAC:
Pro number:

BAR CODE SPACE

THIRD PARTY FREIGHT CHARGES BILL TO:

Name:
Address:
City/State/Zip:

Freight Charge Terms:
Prepaid _____ Collect _____ 3rd Party _____

☐ (check box) Master Bill of Lading: with attached underlying Bills of Lading

SPECIAL INSTRUCTIONS:
Omnisource covers freight charge

CUSTOMER ORDER INFORMATION

CUSTOMER ORDER NUMBER	# PKGS	WEIGHT	PALLET/SLIP Y	or N	ADDITIONAL SHIPPER INFO
Scrap Steel - PCB <50ppm	1	76400			40 CY roll off
GRAND TOTAL					

CARRIER INFORMATION

HANDLING UNIT QTY	HANDLING UNIT TYPE	PACKAGE QTY	PACKAGE TYPE	WEIGHT	H.M. (X)	COMMODITY DESCRIPTION (Commodities requiring special or additional care or attention in handling or stowing must be so marked and packaged as to ensure safe transportation with ordinary care. See Section 2(e) of NMFC Item 360)	LTL ONLY NMFC #	LTL ONLY CLASS
						GRAND TOTAL		

RECEIVING STAMP SPACE

Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property as follows:

"The agreed or declared value of the property is specifically stated by the shipper to be not exceeding

per

COD Amount: $

Fee Terms: Collect: ☐ Prepaid: ☐
Customer check acceptable: ☐

NOTE Liability Limitation for loss or damage in this shipment may be applicable. See 49 U.S.C. - 14706(c)(1)(A) and (B).

RECEIVED, subject to individually determined rates or contracts that have been agreed upon in writing between the carrier and shipper, if applicable, otherwise to the rates, classifications and rules that have been established by the carrier and are available to the shipper, on request, and to all applicable state and federal regulations.

The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

Shipper Signature

SHIPPER SIGNATURE / DATE

This is to certify that the above named materials are properly classified, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the DOT. All cargo tendered for transport is subject to inspection. By tendering cargo to carrier, shipper grants consent to such an inspection.

Trailer Loaded:
☑ By Shipper
☐ By Driver

Freight Counted:
☐ By Shipper
☐ By Driver/pallets said to contain
☑ By Driver/Pieces

CARRIER SIGNATURE / PICKUP DATE

Carrier acknowledges receipt of packages and required placards. Carrier certifies emergency response information was made available and/or carrier has the DOT emergency response guidebook or equivalent documentation in the vehicle.

5/15/14

Ticket # TDKNOD

** TICKET REPRINT on 05/16/14 **

PURCHASE TICKET

OMNI - ST. MARY'S
4575 CR 33A
ST. MARY'S, OH 45885

DR 37 TS CNTRL NO.: 37 52328

DKNOD
: 1 PIPER

Ship Date: 05/15/14

: TK 1

From: ARC129
S INC
DR STE 200
RANCH, CO 80129-2379

915-01

Supplier SO # B0031335.2013

PIP01 - PIPER TRUCKING & LEA

OTM Ref # 20140515-0409

	Pounds				
: Material	Gross	Tare	Net	Adj	Pd Wt
' UNPREPARED P&S 1601	75920a	48940a	26980	0	26980
			26980	0	26980

ight Date/Time 05/15/14 14:19
ight Date/Time 05/15/14 14:49

ts are reported in Pounds unless otherwise indicated
sents a manually entered weight

rtifies that, except for those items noted on the
ticket, delivered material does not contain any of
wing, Prohibited and/or Environmenatally Sensitive
.

d Materials:
d vehicles containing batteries, accessible mercury
es, air conditioning units with Refrigerant, or
ive residual fluids (e.g. motor oil, transmission
radiator coolant, etc.)
ous Materials, Hazardous Waste, or their containers
ssed gas cylinders and propane tanks that have not been
ly vented and depressurized.
otive Material.
cs-Containing Material.

act to any goods that previously contained refrigerant,
rtifies that prior to delivery of such goods to
e, all Refrigerants that had not leaked previously
ved from the goods in accordance with the procedures
in 40 C.F.R., 82.156(g) or (h), as applicable, and in

Date: 7-22-14

BILL OF LADING

SHIP FROM

Name: GE AVIATION
Address: 1 Neumann Way
City/State/Zip: Cincinnati, OH 45214
SID#:
FOB: ☐

Bill of Lading Number: 07-22-2014A

BAR CODE SPACE

SHIP TO

Name: Omnisource
Location #:
Address: 4575 County Road 33A
City/State/Zip: St. Mary's, OH 45885
CID#:
FOB: ☐

CARRIER NAME: Piper Trucking
Trailer number:
Seal number(s):

SCAC:
Pro number:

BAR CODE SPACE

THIRD PARTY FREIGHT CHARGES BILL TO:

Name:
Address:
City/State/Zip:

SPECIAL INSTRUCTIONS:
Omniscource covers freight charge

Freight Charge Terms:
Prepaid _____ Collect _____ 3rd Party _____

☐ (check box) Master Bill of Lading: with attached underlying Bills of Lading

CUSTOMER ORDER INFORMATION

CUSTOMER ORDER NUMBER	# PKGS	WEIGHT	PALLET/SLIP Y or N	ADDITIONAL SHIPPER INFO
	1	67480		60 CY roll off
GRAND TOTAL				

CARRIER INFORMATION

HANDLING UNIT QTY	HANDLING UNIT TYPE	PACKAGE QTY	PACKAGE TYPE	WEIGHT	H.M. (X)	COMMODITY DESCRIPTION (Commodities requiring special or additional care or attention in handling or stowing must be so marked and packaged as to ensure safe transportation with ordinary care. See Section 2(e) of NMFC Item 360)	LTL ONLY NMFC #	LTL ONLY CLASS
						GRAND TOTAL		

RECEIVING STAMP SPACE

Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property as follows:

"The agreed or declared value of the property is specifically stated by the shipper to be not exceeding _____ per _____"

COD Amount: $

Fee Terms: Collect: ☐ Prepaid: ☐
Customer check acceptable: ☐

NOTE Liability Limitation for loss or damage in this shipment may be applicable. See 49 U.S.C. - 14706(c)(1)(A) and (B).

RECEIVED, subject to individually determined rates or contracts that have been agreed upon in writing between the carrier and shipper, if applicable, otherwise to the rates, classifications and rules that have been established by the carrier and are available to the shipper, on request, and to all applicable state and federal regulations.

The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

X ARCADIS

Shipper Signature

SHIPPER SIGNATURE / DATE

This is to certify that the above named materials are properly classified, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the DOT. All cargo tendered for transport is subject to inspection. By tendering cargo to carrier, shipper grants consent to such an inspection.

Trailer Loaded:
☐ By Shipper
☐ By Driver

Freight Counted:
☐ By Shipper
☐ By Driver/pallets said to contain
☐ By Driver/Pieces

CARRIER SIGNATURE / PICKUP DATE

Carrier acknowledges receipt of packages and required placards. Carrier certifies emergency response information was made available and/or carrier has the DOT emergency response guidebook or equivalent documentation in the vehicle.

John Iker on Behalf of GE
7-22-14

Ticket # TDTYIX

PURCHASE TICKET

OMNI - ST. MARY'S
4575 CR 33A
ST. MARY'S, OH 45885

BR 37 TS CNTRL NO.: 37 58087
Date: 07/22/14
Ship Date: 07/22/14

Ticket # TDTYIX
Vehicle ID: 1 PIPER

Vehicle No: TK 1

Purchased From: ARC129
ARCADIS US INC
630 PLAZA DR STE 200
HIGHLANDS RANCH, CO 80129-2379

Order # 23915-01 Supplier SO # B0031335.2013

Carrier: ZPIP01 - PIPER TRUCKING & LEA OTM Ref # 20140722-0336

Itm	Shpmnt	Material	Pounds Gross	Tare	Net	Adj	Pd Wt
1.	2D3054	UNPREPARED P&S 1601	67340a	50440a	16900	0	16900
Totals					16900	0	16900

Gross Wght Date/Time 07/22/14 14:44
Tare Wght Date/Time 07/22/14 15:16

GROSS TONS
7.5446

All weights are reported in Pounds unless otherwise indicated
"m" Represents a manually entered weight

Seller certifies that, except for those items noted on the inspection ticket, delivered material does not contain any of the following, Prohibited and/or Environmenatally Sensitive materials.

Prohibited Materials:
* Crushed vehicles containing batteries, accessible mercury switches, air conditioning units with Refrigerant, or excessive residual fluids (e.g. motor oil, transmission fluid, radiator coolant, etc.)
* Hazardous Materials, Hazardous Waste, or their containers
* Compressed gas cylinders and propane tanks that have not been properly vented and depressurized.
* Radioactive Material.
* Asbestos-Containing Material.

With respect to any goods that previously contained refrigerant, Seller certifies that prior to delivery of such goods to OmniSource, all Refrigerants that had not leaked previously were removed from the goods in accordance with the procedures described in 40 C.F.R., 82.156(g) or (h), as applicable, and in full compliance with applicable federal, state and local laws and regulations.

The Seller further agrees to indemnify and hold OmniSource

2. PCB Bulk Waste

007035730FLE

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) CN7633229-002 SC PPW 8/8/2013

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: OHD000817312
2. Page 1 of 1
3. Emergency Response Phone: (800) 483-8718
4. Manifest Tracking Number: 007035730 FLE

5. Generator's Name and Mailing Address
General Electric Engine
One Neumann Way, Mail Drop N123
Cincinnati, OH 45215
Generator's Phone: (513) 243-5887 ATTN: Jeff Gatt

Generator's Site Address (if different than mailing address)
One Neumann Way MD N123
Cincinnati, OH 45215

6. Transporter 1 Company Name: EQ Industrial Services Inc — U.S. EPA ID Number: MID000263871

7. Transporter 2 Company Name — U.S. EPA ID Number:

8. Designated Facility Name and Site Address
Wayne Disposal Inc
49350 North I-94 Service Drive
Belleville, MI 48111
Facility's Phone: (800) 592-5489
U.S. EPA ID Number: MID048090633

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
x	1. RQ, UN3432, POLYCHLORINATED BIPHENYLS, SOLID, 9, PG II	1	CM	11,400	K	PCB
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
1.J135111WDI ERG#171
PO# W130398590 OSD: 10/25/13 ID#: CHRT26257-1025

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: [signature] — Signature: [signature] — Month 10 Day 25 Year 13

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Sam Cook — Signature: [signature] — Month 10 Day 25 Year 13
Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Actual weight 8636 kg ok per Glenn ropping w/ EQ SC 10/30/13
Manifest Reference Number:
18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. PCB 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Charles Swore — Signature: [signature] — Month 10 Day 25 Year 13

GENERATOR / INT'L / TRANSPORTER / DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR

Wayne Disposal, Inc.

49350 North I-94 Service Drive, Belleville, Michigan 48111

Receipt Preview

EQ NORTHEAST
185 INDUSTRIAL ROAD
PO BOX 617
WRENTHAM, MA 02093

Receipt ID: 1234756
EQ Account #: 1125
Manifest / BOL: 007035730FLE
Transporter: EQISYPSI
Date: 10/25/2013
Time In: 3:45 PM
Time Out: 5:09 PM

Line	Description Generator	Qty. Unit
1 - 1	J135111WDI - PCB contaminated garnet	9.500 TONS
	Hazardous Surcharge Ton	9.500 TONS
	OHD000817312 GE AIRCRAFT ENGINES	
	Gross: 65,180 **Tare:** 46,180 **Net:** 19,000	
4	Wayne Disposal Host Community Agreement Royalty Fee	9.500 TONS
	OHD000817312 GE AIRCRAFT ENGINES	
	Gross: 65,180 **Tare:** 46,180 **Net:** 19,000	

NO SALVAGING ON PREMISES

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) CN7633229-002 SC PPW 8/6/2013 Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: OHD000817312
2. Page 1 of: 1
3. Emergency Response Phone: (800) 483-3718
4. Manifest Tracking Number: 007035758 FLE

5. Generator's Name and Mailing Address
GE Aircraft Engines
One Neumann Way, Mail Drop N123
Cincinnati, OH 45215
Generator's Phone: (513) 243-5997 ATTN:Jeff Gati

Generator's Site Address (if different than mailing address)
One Neumann Way MD N123
Cincinnati,OH 45215

6. Transporter 1 Company Name: EQ Industrial Services Inc
U.S. EPA ID Number: MID000263871

7. Transporter 2 Company Name:
U.S. EPA ID Number:

8. Designated Facility Name and Site Address
Wayne Disposal Inc
49350 North I-94 Service Drive
Belleville, MI 48111
Facility's Phone: (800) 592-5489
U.S. EPA ID Number: MID048090633

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
x	1. RQ, UN3432, POLYCHLORINATED BIPHENYLS, SOLID, 9, PG II ()	1	CM	10,600	K	PCB1
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
1.J135111WDI ERG#171
Disposal PO# W140420874
Transportation PO# W140420875 OSD: 10/21/13 ID# CHRT24002-1015

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Tim Oakes
Signature:
Month 01 Day 15 Year 14

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Sam Cook
Signature:
Month 1 Day 15 Year 14
Transporter 2 Printed/Typed Name:
Signature:
Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. PCB 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name
Signature
Month Day Year

GENERATOR / INT'L / TRANSPORTER / DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) CN7633229-002 SC PPW 8/6/2013 Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
	OHD000817312	1	(800) 483-3718	007035759 FLE

5. Generator's Name and Mailing Address
GE Aircraft Engines
One Neumann Way, Mail Drop N123
Cincinnati, OH 45215
Generator's Phone: (513) 243-5997 ATTN: Jeff Gati

Generator's Site Address (if different than mailing address)
One Neumann Way MD N123
Cincinnati, OH 45215

6. Transporter 1 Company Name: EQ Industrial Services Inc — U.S. EPA ID Number: MID000263871

7. Transporter 2 Company Name: — U.S. EPA ID Number:

8. Designated Facility Name and Site Address
Wayne Disposal Inc
49350 North I-94 Service Drive
Belleville, MI 48111
Facility's Phone: (800) 592-5489
U.S. EPA ID Number: MID048090633

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
x	1. RQ, UN3432, POLYCHLORINATED BIPHENYLS, SOLID, 9, PG II ()	1	CM	10,000	K	PCB1
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
1. J135111WDI ERG#171
Disposal PO# W140420874
Transportation PO# W140420875 OSD: 10/28/13 ID# CHRT24122-115

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Tim Oakes — Signature: [signature] — Month 01 Day 15 Year 14

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: MATT Rice — Signature: [signature] — Month 1 Day 15 Year 14
Transporter 2 Printed/Typed Name: / — Signature: — Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. PCB 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name — Signature — Month Day Year

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

GENERATOR — INT'L — TRANSPORTER — DESIGNATED FACILITY

Ulans are obsolete.

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) CN7633229-002 SC PPW 8/6/2013 Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: OHD000817312
2. Page 1 of 1
3. Emergency Response Phone: (800) 483-3718
4. Manifest Tracking Number: 007035760 FLE

5. Generator's Name and Mailing Address
GE Aircraft Engines
One Neumann Way, Mail Drop N123
Cincinnati, OH 45215
Generator's Phone: (513) 243-5997 ATTN: Jeff Gati

Generator's Site Address (if different than mailing address)
One Neumann Way MD N123
Cincinnati, OH 45215

6. Transporter 1 Company Name: EQ Industrial Services Inc — U.S. EPA ID Number: MID000263871

7. Transporter 2 Company Name — U.S. EPA ID Number:

8. Designated Facility Name and Site Address
Wayne Disposal Inc
49350 North I-94 Service Drive
Belleville, MI 48111
Facility's Phone: (800) 592-5489
U.S. EPA ID Number: MID048090633

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
x	1 RQ, UN3432, POLYCHLORINATED BIPHENYLS, SOLID, 9, PG II ()	1	CM	6,000	K	PCB1		
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information
1. J135111WDI ERG#171
Disposal PO# W1404208 74
Transportation PO# W1404208 75 OSD: 12/12/13 ID# CHRT25232-0115

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Jim Oakes — Signature: — Month Day Year: 01 15 14

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: DONALD Thompson — Signature: — Month Day Year: 01 15 14
Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. PCB 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name — Signature — Month Day Year

GENERATOR — INT'L — TRANSPORTER — DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete. DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) CN7633229-002 SC PPW 8/8/2013 Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: OHD000817312
2. Page 1 of 1
3. Emergency Response Phone: (800) 483-3718
4. Manifest Tracking Number: 007035761 FLE

5. Generator's Name and Mailing Address
GE Aircraft Engines
One Neumann Way, Mail Drop N123
Cincinnati, OH 45215
Generator's Phone: (513) 243-5997 ATTN: Jeff Gati

Generator's Site Address (if different than mailing address)
One Neumann Way MD N123
Cincinnati, OH 45215

6. Transporter 1 Company Name: EQ Industrial Services Inc
U.S. EPA ID Number: MID000263871

7. Transporter 2 Company Name:
U.S. EPA ID Number:

8. Designated Facility Name and Site Address
Wayne Disposal Inc
49350 North I-94 Service Drive
Belleville, MI 48111
Facility's Phone: (800) 592-5489
U.S. EPA ID Number: MID048090633

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
x	1 RQ, UN3432, POLYCHLORINATED BIPHENYLS, SOLID, 9, PG II ()	1	CM	7,000	K	PCB1		
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information
1. J135111WDI ERG#171
Disposal PO# W1460420874
Transportation PO# W1404720875 OSD: 12/03/13 ID# CHI2563-D115

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Jim Oakes Signature: Month 10 Day 15 Year 14

GENERATOR

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER INT'L

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: John Oban Signature: Month 10 Day 15 Year 14
Transporter 2 Printed/Typed Name: Signature: Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator) U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) Month Day Year

DESIGNATED FACILITY

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. PCB 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name Signature Month Day Year

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) CN7033220-002 SC PPW 12/11/2013

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: OHD000817312
2. Page 1 of: 1
3. Emergency Response Phone: (800) 483-8718
4. Manifest Tracking Number: 007035747 FLE

GENERATOR

5. Generator's Name and Mailing Address: GE Aircraft Engines, One Neumann Way, Mail Drop M123, Cincinnati, OH 45215
Generator's Phone: (513) 243-5997 ATTN: Jeff Gall
Generator's Site Address (if different than mailing address): One Neumann Way MD M123, Cincinnati, OH 45215

6. Transporter 1 Company Name: Clean Harbors Environmental Services Inc EQ Industrial Services
U.S. EPA ID Number: MAD000203811 ~~MAD980822250~~

7. Transporter 2 Company Name:
U.S. EPA ID Number:

8. Designated Facility Name and Site Address: Wayne Disposal Inc, 49055 North I-94 Service Drive, Belleville, MI 48111
Facility's Phone: (800) 592-8440
U.S. EPA ID Number: MID048090633

9a. HM	9b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
x	1. RQ, UN3432, POLYCHLORINATED BIPHENYLS, SOLID, 9, PG II ()	1	CM	8550	K	PCB1
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
1.J135111MDI ERG#171
Disposal Po# Transportation PO#
W140442833 W140442838 OSD: 01/28/14 ID#: CHRT24560-32414

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Jim Oakes Signature: Month 3 Day 24 Year 14

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Jonathon Stephens Signature: Month 3 Day 24 Year 14
Transporter 2 Printed/Typed Name: Signature: Month Day Year

DESIGNATED FACILITY

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type 03/27/14 ☐ Residue ☐ Partial Rejection ☐ Full Rejection
OK TO CORRECT PER JOHN IKERW/ Clean Harbors 03/27/14
ACTUAL WEIGHT: 04,555K OK PER JOHN IKERW/ Clean Harbors 03/27/14
Manifest Reference Number:
18b. Alternate Facility (or Generator) U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. PCB 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a
Printed/Typed Name: Jessica Potter Signature: Month 3 Day 24 Year 14

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete. DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Line 7

Wayne Disposal, Inc.
49350 North I-94 Service Drive, Belleville, Michigan 48111

Receipt Preview

EQ NORTHEAST
185 INDUSTRIAL ROAD
PO BOX 617
WRENTHAM, MA 02093

Receipt ID: 1237648
EQ Account #: 1125
Manifest / BOL: 007035747FLE
Transporter: CHES
Date: 03/24/2014
Time In: 1:50 PM
Time Out: 3:05 PM

Line	Description Generator	Qty. Unit
1 - 1	J135111WDI - PCB contaminated garnet	7.100 TONS
	Hazardous Surcharge Ton	7.100 TONS
	OHD000817312 GE AIRCRAFT ENGINES	
	Gross: 60,540 **Tare:** 46,340 **Net:** 14,200	
4	Wayne Disposal Host Community Agreement Royalty Fee	7.100 TONS
	OHD000817312 GE AIRCRAFT ENGINES	
	Gross: 60,540 **Tare:** 46,340 **Net:** 14,200	

Haz charge
10.00/ton

Royalty 1.65/ton

NO SALVAGING ON PREMISES

CN7633229-002 SC PPW 12/11/2013

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

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: OHD000817312
2. Page 1 of: 1
3. Emergency Response Phone: (800) 483-8713
4. Manifest Tracking Number: 007035748 FLE

5. Generator's Name and Mailing Address:
GE Aircraft Engines
One Neumann Way, Mail Drop N123
Cincinnati, OH 45215
Generator's Phone: (513) 243-5007 ATTN: Jeff Gall

Generator's Site Address (if different than mailing address):
One Neumann Way MD N123
Cincinnati, OH 45215

6. Transporter 1 Company Name: ~~Clean Harbors Environmental Services Inc~~ EQ Industrial Services
U.S. EPA ID Number: MID 000 263 871 ~~MAD039322250~~

7. Transporter 2 Company Name:
U.S. EPA ID Number:

8. Designated Facility Name and Site Address:
Wayne Disposal Inc
49350 North I-94 Service Drive
Belleville, MI 48111
Facility's Phone: (800) 592-5489
U.S. EPA ID Number: MID048090633

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. RQ, UN3432, POLYCHLORINATED BIPHENYLS, SOLID, 9, PG II ()	1	CM	5,600	K	PCB1
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
1.J135111WDI ERG#171
Disposal PO# Transportation PO#
W140442832 W140442836 OSD: 01/11/14 ID#: CHRT25619-324

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Jim Oakes
Signature:
Month Day Year: 3 24 14

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: John Osborn
Signature:
Month Day Year: 03 24 14
Transporter 2 Printed/Typed Name:
Signature:
Month Day Year:

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type 03/27/14 ☐ Residue ☐ Partial Rejection ☐ Full Rejection
ok to correct per John Iker w/ Clean Harbors. 03/27/14 ott
actual weight: 2,945kg ok per John Iker w/ Clean Harbors. 03/27/14 ott
Manifest Reference Number:
18b. Alternate Facility (or Generator)
U.S. EPA ID Number:
Facility's Phone:
18c. Signature of Alternate Facility (or Generator)
Month Day Year:

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. PCB 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Tanya Cowgar
Signature:
Month Day Year: 03 24 14

GENERATOR / INT'L / TRANSPORTER / DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Line 6

Wayne Disposal, Inc.
49350 North I-94 Service Drive, Belleville, Michigan 48111

Receipt Preview

EQ NORTHEAST
185 INDUSTRIAL ROAD
PO BOX 617
WRENTHAM, MA 02093

Receipt ID: 1237649
EQ Account #: 1125
Manifest / BOL: 007035748FLE
Transporter: CHES
Date: 03/24/2014
Time In: 2:04 PM
Time Out: 3:37 PM

Line	Description Generator	Qty. Unit
1 - 1	J135111WDI - PCB contaminated garnet	3.240 TONS
	Hazardous Surcharge Ton	3.240 TONS
	OHD000817312 GE AIRCRAFT ENGINES	
	Gross: 51,760 **Tare:** 45,280 **Net:** 6,480	
4	Wayne Disposal Host Community Agreement Royalty Fee	3.240 TONS
	OHD000817312 GE AIRCRAFT ENGINES	
	Gross: 51,760 **Tare:** 45,280 **Net:** 6,480	

Added handling fee to this
2400.00
W 140442832

Haz Surcharge
10.00 ton
Royalty
1.65 ton -

Added return trans to
W140442836

NO SALVAGING ON PREMISES

TR0084

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) CN7033229-002 SC PPW 12/11/2013 Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
	OHD000817312	1	(800) 483-3718	007035774 FLE

5. Generator's Name and Mailing Address
GE Aircraft Engines
One Neumann Way, Mail Drop N123
Cincinnati, OH 45215
Generator's Phone: (513) 243-3697 ATTN:Jeff Gati

Generator's Site Address (if different than mailing address)
One Neumann Way MD N123
Cincinnati,OH 45215

6. Transporter 1 Company Name
~~Clean Harbors Environmental Services Inc~~ EQIS
U.S. EPA ID Number MID000263871 ~~[illegible]~~

7. Transporter 2 Company Name
U.S. EPA ID Number

8. Designated Facility Name and Site Address
Wayne Disposal Inc
49350 North I-94 Service Drive
Belleville, MI 48111
Facility's Phone: (800) 592-5489
U.S. EPA ID Number MID048090633

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
x	1. RQ, UN3432, POLYCHLORINATED BIPHENYLS, SOLID, 9, PG II ()	1	CM	3,600	K	PCB1
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
1.J135111WDI ERG#171
Disposal PO# Transportation PO#
W140442834 W140442841 ID#CHRT 26540-32614 OSD: 02/13/14

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: TIM OAKES
Signature: [signature]
Month 3 Day 26 Year 14

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Bennett Smith
Signature: [signature]
Month 3 Day 26 Year 14
Transporter 2 Printed/Typed Name
Signature
Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. PCB 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: [signature]
Signature: [signature]
Month 3 Day 27 Year 14

GENERATOR / INT'L / TRANSPORTER / DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete. DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Line 8

Wayne Disposal, Inc.
49350 North I-94 Service Drive, Belleville, Michigan 48111

Receipt Preview

EQ NORTHEAST
185 INDUSTRIAL ROAD
PO BOX 617
WRENTHAM, MA 02093

Receipt ID: 1237758
EQ Account #: 1125
Manifest / BOL: 007035774FLE
Transporter: EQISYPSI
Date: 03/27/2014
Time In: 3:17 PM
Time Out: 5:17 PM

Line	Description Generator	Qty. Unit
1 - 1	J135111WDI - PCB contaminated garnet	1.110 TONS
	Hazardous Surcharge Ton	1.110 TONS
	OHD000817312 GE AIRCRAFT ENGINES	
	Gross: 40,040 **Tare:** 37,820 **Net:** 2,220	
4	Wayne Disposal Host Community Agreement Royalty Fee	1.110 TONS
	OHD000817312 GE AIRCRAFT ENGINES	
	Gross: 40,040 **Tare:** 37,820 **Net:** 2,220	

NO SALVAGING ON PREMISES

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) CN7633229-002 SC PPW 12/11/2013 Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
	OHD000817312	1	(800) 483-3718	007035776 FLE

5. Generator's Name and Mailing Address
GE Aircraft Engines
One Neumann Way, Mail Drop N123
Cincinnati, OH 45215
Generator's Phone: (513) 243-5997 ATTN: Jeff Gati

Generator's Site Address (if different than mailing address)
One Neumann Way MD N123
Cincinnati, OH 45215

6. Transporter 1 Company Name: EQ Industrial Services Inc — U.S. EPA ID Number: MID000263871

7. Transporter 2 Company Name — U.S. EPA ID Number:

8. Designated Facility Name and Site Address
Wayne Disposal Inc
49350 North I-94 Service Drive
Belleville, MI 48111
Facility's Phone: (800) 592-5489
U.S. EPA ID Number: MID048090633

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
x	1. RQ, UN3432, POLYCHLORINATED BIPHENYLS, SOLID, 9, PG II ()	1	CM	9,400	K	PCB1
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
1.J135111WDI ERG#171
Disposal PO# W140442835
Transportation PO# W140442843
OSD: 3/04/14
ID# CHRT262270-082714

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: JEFF GATI — Signature: [signature] — Month 03 Day 27 Year 14

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: JON STEPHENS — Signature: [signature] — Month 03 Day 27 Year 14
Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. PCB 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Dan Stiller — Signature: [signature] — Month 3 Day 27 Year 14

GENERATOR / INT'L / TRANSPORTER / DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete. DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Line 9

Wayne Disposal, Inc.
49350 North I-94 Service Drive, Belleville, Michigan 48111

Receipt Preview

EQ NORTHEAST
185 INDUSTRIAL ROAD
PO BOX 617
WRENTHAM, MA 02093

Receipt ID: 1237757
EQ Account #: 1125
Manifest / BOL: 007035776FLE
Transporter: EQISYPSI
Date: 03/27/2014
Time In: 2:39 PM
Time Out: 5:14 PM

Line	Description Generator	Qty. Unit
1 - 1	313511TWDI - PCB contaminated gamet	7.770 TONS
	Hazardous Surcharge Ton	7.770 TONS
	OHD000817312 GE AIRCRAFT ENGINES	
	Gross: 61,660 **Tare:** 46,120 **Net:** 15,540	
4	Wayne Disposal Host Community Agreement Royalty Fee	7.770 TONS
	OHD000817312 GE AIRCRAFT ENGINES	
	Gross: 61,660 **Tare:** 46,120 **Net:** 15,540	

Add handling fee 2400.00
W140442835

Add return tran 1500.00
W140442843

Haz Surcharge 10/ton
Royalty Fee 1.45/ton

NO SALVAGING ON PREMISES

007035778FLE

CN7033229-002 SC PPW 12/11/2013

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: OHD000817312
2. Page 1 of: 1
3. Emergency Response Phone: (800) 489-3718
4. Manifest Tracking Number: 007035778 FLE

5. Generator's Name and Mailing Address: GE Aircraft Engines, One Neumann Way, Mail Drop N123, Cincinnati, OH 45215
Generator's Phone: (513) 243-5007 ATTN:Jeff Gall
Generator's Site Address (if different than mailing address): One Neumann Way MD N123, Cincinnati,OH 45215

6. Transporter 1 Company Name: EQ Industrial Services Inc — U.S. EPA ID Number: MID000263871

7. Transporter 2 Company Name — U.S. EPA ID Number:

8. Designated Facility Name and Site Address: Wayne Disposal Inc, 49350 North I-94 Service Drive, Belleville, MI 48111
Facility's Phone: (800) 592-5489 — U.S. EPA ID Number: MID048090633

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. RQ, UN3432, POLYCHLORINATED BIPHENYLS, SOLID, 9, PG II ()	1	CM	1224	K	PCB		
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information
1.J135111WDI ERG#171
Disposal PO# W14045103 OSD: 03/03/14
Transportation PO# W14045103 7 ID# CHRT 26543-42214

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Jim Osler — Signature: — Month 4 Day 22 Year 14

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Frank Hart — Signature: — Month 04 Day 22 Year 14
Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. PCB 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a
Printed/Typed Name: Zack Listman — Signature: — Month 04 Day 22 Year 14

GENERATOR — INT'L — TRANSPORTER — DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete. DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Line 10

Wayne Disposal, Inc.

49350 North I-94 Service Drive, Belleville, Michigan 48111

Receipt

EQ NORTHEAST
185 INDUSTRIAL ROAD
PO BOX 617
WRENTHAM, MA 02093

Receipt ID: 1238024
EQ Account #: 1125
Manifest / BOL: 007035778FLE
Transporter: EQISYPSI
Date: 04/22/2014
Time In: 2:24 PM
Time Out: 4:37 PM

Line	Description Generator	Qty. Unit
1 - 1	J135111WDI - PCB contaminated garnet	1.330 TQNS
	Hazardous Surcharge Ton	1.330 TONS
	OHD000817312 GE AIRCRAFT ENGINES	
	Gross: 49,220 **Tare:** 46,560 **Net:** 2,660	
2	Roll-Off/ Hand-Off Fee per Day Multiple	1.000 EACH
	OHD000817312 GE AIRCRAFT ENGINES	
	Gross: 49,220 **Tare:** 46,560 **Net:** 2,660	
4	Wayne Disposal Host Community Agreement Royalty Fee	1.330 TONS
	OHD000817312 GE AIRCRAFT ENGINES	
	Gross: 49,220 **Tare:** 46,560 **Net:** 2,660	

NO SALVAGING ON PREMISES

007035779FLE

CN7033220-002 SC PPW 12/11/2013

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: OHD000817312
2. Page 1 of: 1
3. Emergency Response Phone: (800) 483-3713
4. Manifest Tracking Number: 007035779 FLE

5. Generator's Name and Mailing Address: GE Aircraft Engines, One Neumann Way, Mail Drop N122, Cincinnati, OH 45215
Generator's Site Address (if different than mailing address): One Neumann Way MD N122, Cincinnati,OH 45215
Generator's Phone: (513) 243-6897 ATTN:Jeff Gatt

6. Transporter 1 Company Name: EQ Industrial Services Inc — U.S. EPA ID Number: MID000263871

7. Transporter 2 Company Name — U.S. EPA ID Number:

8. Designated Facility Name and Site Address: Wayne Disposal Inc, 49350 North I-94 Service Drive, Belleville, MI 48111 — U.S. EPA ID Number: MID048090633
Facility's Phone: (800) 592-5489

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. RQ, UN3432, POLYCHLORINATED BIPHENYLS, SOLID, 9, PG II ()	1	CM	3909	K	PCB1		
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information
1.J135111WDI ERG#171
Disposal PO# W140451031 OSD: 03/18/14
Transportation PO# W140451038 ID#: CHRT 24560-42214

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Jim Onk — Signature: — Month 4 Day 22 Year 14

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: DAN GIRAUD — Signature: — Month 4 Day 22 Year 14
Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. PCB 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Jessica Kistler — Signature: — Month 4 Day 22 Year 14

GENERATOR — INT'L — TRANSPORTER — DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete. **DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)**

Line 11

Wayne Disposal, Inc.
49350 North I-94 Service Drive, Belleville, Michigan 48111

Receipt

EO NORTHEAST
185 INDUSTRIAL ROAD
PO BOX 617
WRENTHAM, MA 02093

Receipt ID: 1238023
EQ Account #: 1125
Manifest / BOL: 007035779FLE
Transporter: EOISYPSI
Date: 04/22/2014
Time In: 2:20 PM
Time Out: 4:27 PM

Line	Description Generator	Qty. Unit
1 - 1	J135111WDI - PCB contaminated garnet	4.130 TONS
	Hazardous Surcharge Ton	4.130 TONS
	OHD000817312 GE AIRCRAFT ENGINES	
	Gross: 54,860 **Tare:** 46,600 **Net:** 8,260	
4	Wayne Disposal Host Community Agreement Royalty Fee	4.130 TONS
	OHD000817312 GE AIRCRAFT ENGINES	
	Gross: 54,860 **Tare:** 46,600 **Net:** 8,260	

NO SALVAGING ON PREMISES

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) CM7655220-002 SC PPW 12/11/2013 Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: OHD000817312
2. Page 1 of 1
3. Emergency Response Phone: (800) 483-3718
4. Manifest Tracking Number: 007035780 FLE

5. Generator's Name and Mailing Address
GE Aircraft Engines
One Neumann Way, Mail Drop N123
Cincinnati, OH 45215
Generator's Phone: (513) 243-5897 ATTN:Jeff Gatti

Generator's Site Address (if different than mailing address)
One Neumann Way MD N123
Cincinnati,OH 45215

6. Transporter 1 Company Name: EQ Industrial Services Inc — U.S. EPA ID Number: MID000263871

7. Transporter 2 Company Name — U.S. EPA ID Number:

8. Designated Facility Name and Site Address
Wayne Disposal Inc
49350 North I-94 Service Drive
Belleville, MI 48111
Facility's Phone: (800)592-5489
U.S. EPA ID Number: MID048090633

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. RQ, UN3432, POLYCHLORINATED BIPHENYLS, SOLID, 9, PG II ()	1	CM	3,700	K	PCB1
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
1.J135111WDI ERG#171
Disposal PO# W140459078
Transportation PO# W140459080 OSD: 5/1/14 ID#CHRT26280-05-1514

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Jeffrey D. Gatti — Signature: [signature] — Month 05 Day 14 Year 14

INT'L
16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER
17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: DAN GITAUA — Signature: [signature] — Month 05 Day 15 Year 14
Transporter 2 Printed/Typed Name — Signature — Month Day Year

DESIGNATED FACILITY
18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. PCB 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name — Signature — Month Day Year

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete. DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

[redacted]

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UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
OHD000817312	1	(800) 483-3718	007035781 FLE

5. Generator's Name and Mailing Address
GE Aircraft Engines
One Neumann Way, Mail Drop N123
Cincinnati, OH 45215
Generator's Phone: (513) 243-5097 ATTN:Jeff Gatt

Generator's Site Address (if different than mailing address)
One Neumann Way MD N123
Cincinnati,OH 45215

6. Transporter 1 Company Name
EQ Industrial Services Inc
U.S. EPA ID Number: MID000263871

7. Transporter 2 Company Name
U.S. EPA ID Number:

8. Designated Facility Name and Site Address
Wayne Disposal Inc
49350 North I-94 Service Drive
Belleville, MI 48111
Facility's Phone: (800) 592-5489
U.S. EPA ID Number: MID048090633

9a. HM	9b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
x	1. RQ, UN3432, POLYCHLORINATED BIPHENYLS, SOLID, 9, PG II ()	1	CM	1,760	K	PCB1
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
1.J135111WDI ERG#171
Disposal PO# W1404590 79
Transportation PO# W14045908 1
OSD: 5/1/14 ID# 40499-5-14/14

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: JEFFREY D. GATT
Signature:
Month 05 Day 14 Year 14

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: MATT RICE
Signature:
Month 5 Day 15 Year 14
Transporter 2 Printed/Typed Name:
Signature:
Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator) U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator) Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. PCB 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name Signature Month Day Year

GENERATOR — INT'L — TRANSPORTER — DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) CN CN7633229-002 SC PPW 5/22/2014 Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
OHD000817312	1	(800) 483-3718	007035782 FLE

5. Generator's Name and Mailing Address
GE Aircraft Engines
One Neumann Way, Mail Drop N123
Cincinnati, OH 45215
Generator's Phone: (513) 243-5997 ATTN:Jeff Gati

Generator's Site Address (if different than mailing address)
One Neumann Way MD N123
Cincinnati,OH 45215

6. Transporter 1 Company Name: EQ Industrial Services Inc — U.S. EPA ID Number: MID000263871

7. Transporter 2 Company Name — U.S. EPA ID Number:

8. Designated Facility Name and Site Address
Wayne Disposal Inc
49350 North I-94 Service Drive
Belleville, MI 48111
Facility's Phone: (800) 592-5489
U.S. EPA ID Number: MID048090633

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. RQ, UN3432, POLYCHLORINATED BIPHENYLS, SOLID, 9, PG II ()	1	CM	5,450	K	PCB1
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
ID# CHRT26559-6914 OSD: 05-21-14
1.J135111WDI ERG#171
Disposal PO # W140465706
Transportation PO# W140465709 Handling fee PO# W140465706

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: JEFF GATI — Signature: [signature] — Month 08 Day 08 Year 14

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Daniel Myers — Signature: [signature] — Month 08 Day 08 Year 14
Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. PCB 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name — Signature — Month Day Year

GENERATOR — INT'L — TRANSPORTER — DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete. DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

CN CN7633229-002 SC PPW 5/22/2014

Form Approved. OMB No. 2050-0039

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

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: OHD000817312
2. Page 1 of: 1
3. Emergency Response Phone: (800) 483-3718
4. Manifest Tracking Number: 007035784 FLE

5. Generator's Name and Mailing Address
GE Aircraft Engines
One Neumann Way, Mail Drop N123
Cincinnati, OH 45215
Generator's Phone: (513) 243-5897 ATTN:Jeff Gati

Generator's Site Address (if different than mailing address)
One Neumann Way MD N123
Cincinnati,OH 45215

U.S. EPA ID Number: MID000263871

6. Transporter 1 Company Name: EQ Industrial Services Inc
U.S. EPA ID Number:

7. Transporter 2 Company Name
U.S. EPA ID Number:

8. Designated Facility Name and Site Address
Wayne Disposal Inc
49350 North I-94 Service Drive
Belleville, MI 48111
Facility's Phone: (800) 592-5489
U.S. EPA ID Number: MID048090633

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
x	1. RQ, UN3432, POLYCHLORINATED BIPHENYLS, SOLID, 9, PG II ()	1	CM	9,750	K	PCB
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
1.J135111WDI ERG#171
PO# W140484313
ID: CHRT26542 - 81214
OSD: 6/25/14

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: JEFF GATI
Signature:
Month Day Year: 8 12 14

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: DAN GIRARD
Signature:
Month Day Year: 8 12 14

Transporter 2 Printed/Typed Name
Signature:
Month Day Year:

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number:
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month Day Year:

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. PCB 1 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name
Signature
Month Day Year

GENERATOR | INT'L | TRANSPORTER | DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

CN CN7033229-002 SC PPW 5/22/2014

Form Approved. OMB No. 2050-0039

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

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: OHD000817312
2. Page 1 of: 1
3. Emergency Response Phone: (800) 483-3718
4. Manifest Tracking Number: 007035785 FLE

5. Generator's Name and Mailing Address
GE Aircraft Engines
One Neumann Way, Mail Drop N123
Cincinnati, OH 45215
Generator's Phone: (513) 243-5997 ATTN:Jeff Gati

Generator's Site Address (if different than mailing address)
One Neumann Way MD N123
Cincinnati,OH 45215

6. Transporter 1 Company Name: EQ Industrial Services Inc
U.S. EPA ID Number: MID000263871

7. Transporter 2 Company Name:
U.S. EPA ID Number:

8. Designated Facility Name and Site Address
Wayne Disposal Inc
49350 North I-94 Service Drive
Belleville, MI 48111
Facility's Phone: (800) 592-5489
U.S. EPA ID Number: MID048090633

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
x	1. RQ, UN3432, POLYCHLORINATED BIPHENYLS, SOLID, 9, PG II ()	1	CM	8,890	K	PCB1
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
1.J135111WDI ERG#171
PO# W140484314
ID#: CHRT26538 - 81214
OSD: 7/15/14

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: JEFF GATI
Signature: [signature]
Month 8 Day 12 Year 14

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: ANTHONY WESTER
Signature: [signature]
Month 8 Day 12 Year 14

Transporter 2 Printed/Typed Name:
Signature:
Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. PCB 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name
Signature
Month Day Year

GENERATOR | INT'L | TRANSPORTER | DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) CN CN 533229-004 SC PPW 12/1/2008 Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
OHD000817312	1	(800) 483-3718	008078455 FLE

5. Generator's Name and Mailing Address
GE Aircraft Engines
One Neumann Way, Mail Drop N123
Cincinnati, OH 45215
Generator's Phone: (513) 243-5997 ATTN: Jeff Gati

Generator's Site Address (if different than mailing address)
One Neumann Way MD N123
Cincinnati, OH 45215

6. Transporter 1 Company Name: EQ Industrial Services Inc — U.S. EPA ID Number: MID000263871

7. Transporter 2 Company Name — U.S. EPA ID Number:

8. Designated Facility Name and Site Address
Wayne Disposal Inc
49350 North I-94 Service Drive
Belleville, MI 48111
Facility's Phone: (800) 592-5489
U.S. EPA ID Number: MID048090633

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
x	RQ, UN3432, POLYCHLORINATED BIPHENYLS, SOLID, 9, PG II ()	1	CM	11,062	K	PCB1		
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information
PO# W140526046
OSD: 11/7/14 ID: CHRT 27052-1222

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Tim Oakes — Signature: — Month 12 Day 22 Year 14

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Daniel Myers — Signature: — Month 12 Day 22 Year 14
Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
PCB			

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name — Signature — Month Day Year

GENERATOR — INT'L — TRANSPORTER — DESIGNATED FACILITY

Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

008078455FLE

0098

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) CN CN7633229-004 SC PPW 12/1/2008

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: OHD000817312
2. Page 1 of: 1
3. Emergency Response Phone: (800) 483-3718
4. Manifest Tracking Number: 008078455 FLE

5. Generator's Name and Mailing Address
GE Aircraft Engines
One Neumann Way, Mail Drop N123
Cincinnati, OH 45215
Generator's Phone: (513) 243-5997 ATTN:Jeff Gati

Generator's Site Address (if different than mailing address)
One Neumann Way MD N123
Cincinnati,OH 45215

6. Transporter 1 Company Name: EQ Industrial Services Inc
U.S. EPA ID Number: MID000263871

7. Transporter 2 Company Name:
U.S. EPA ID Number:

8. Designated Facility Name and Site Address
Wayne Disposal Inc
49350 North I-94 Service Drive
Belleville, MI 48111
Facility's Phone: (800) 592-5489
U.S. EPA ID Number: MID048090633

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
x	RQ, UN3432, POLYCHLORINATED BIPHENYLS, SOLID, 9, PG II ()	1	CM	11,062	K	PCB1
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
1.J135111WDI ERG#171 PO# W140526046
OSD: 11/7/14 ID: CHRT 27052-1222

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: [signature] Signature: [signature] Month 12 Day 22 Year 14

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Daniel Myers Signature: [signature] Month 12 Day 22 Year 14
Transporter 2 Printed/Typed Name: Signature: Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator) U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator) Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. PCB 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Ian Brian Signature: [signature] Month 12 Day 22 Year 14

GENERATOR / INT'L / TRANSPORTER / DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR

Wayne Disposal, Inc.
49350 North I-94 Service Drive, Belleville, Michigan 48111

Receipt

CLEAN HARBORS OF BRAINTREE
42 LONGWATER DRIVE PO Box 9149
ATTN: CENTRAL LOGISTIC DEPT
NORWELL , MA 02061-9149

Receipt ID: 1246553
EQ Account #: 2540
Manifest / BOL: 008078455FLE
Transporter: EQISYPSI
Date: 12/22/2014
Time In: 3:30 PM
Time Out: 5:48 PM

Line	Description Generator	Qty. Unit
1 - 1	J135111WDI - PCB contaminated garnet	12.250 TONS
	Hazardous Surcharge Ton	12.250 TONS
	OHD000817312 GE AIRCRAFT ENGINES	
	Gross: 69,340 **Tare:** 44,840 **Net:** 24,500	
3	Roll-Off/Hand-off, Only 1 Load Per Day	1.000 EACH
	OHD000817312 GE AIRCRAFT ENGINES	
	Gross: 69,340 **Tare:** 44,840 **Net:** 24,500	
4	Wayne Disposal Host Community Agreement Royalty Fee	12.250 TONS
	OHD000817312 GE AIRCRAFT ENGINES	
	Gross: 69,340 **Tare:** 44,840 **Net:** 24,500	

NO SALVAGING ON PREMISES

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) CN CN7833229-004 SC PTW 12/1/2008

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: OH0000817312
2. Page 1 of: 1
3. Emergency Response Phone: (800) 483-3718
4. Manifest Tracking Number: 008078456 FLE

5. Generator's Name and Mailing Address
GE Aircraft Engines
One Neumann Way, Mail Drop N123
Cincinnati, OH 45215
Generator's Phone: (513) 243 5997 ATTN Jeff Gati

Generator's Site Address (if different than mailing address)
One Neumann Way MD N123
Cincinnati, OH 45215

6. Transporter 1 Company Name: EQ Industrial Services Inc
U.S. EPA ID Number: MID000263871

7. Transporter 2 Company Name:
U.S. EPA ID Number:

8. Designated Facility Name and Site Address
Wayne Disposal Inc
49350 North I-94 Service Drive
Belleville, MI 48111
Facility's Phone: (800) 592 5489
U.S. EPA ID Number: MID048090633

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. RQ, UN3432, POLYCHLORINATED BIPHENYLS, SOLID, 9, PG II ()	1	CM	9,750	K	PCB1		
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information
PO # W140526046
QSD: 11/17/14 ID# CHRT26877-1223

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Tim Oakes
Signature:
Month Day Year: 12 23 14

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Daniel Myers
Signature:
Month Day Year: 12 23 14
Transporter 2 Printed/Typed Name:
Signature:
Month Day Year:

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator)
U.S. EPA ID Number:
Facility's Phone:
18c. Signature of Alternate Facility (or Generator)
Month Day Year:

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. PCB 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name:
Signature:
Month Day Year:

GENERATOR | INT'L | TRANSPORTER | DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

008078456FLE

TR 0 1 5

CN CN7633229-004 SC PPW 12/1/2008

Form Approved. OMB No. 2050-0039

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

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: OHD000817312
2. Page 1 of: 1
3. Emergency Response Phone: (800) 483-3718
4. Manifest Tracking Number: 008078456 FLE

5. Generator's Name and Mailing Address
GE Aircraft Engines
One Neumann Way, Mail Drop N123
Cincinnati, OH 45215
Generator's Phone: (513) 243-5997 ATTN:Jeff Gatt

Generator's Site Address (if different than mailing address)
One Neumann Way MD N123
Cincinnati,OH 45215

6. Transporter 1 Company Name: EQ Industrial Services Inc — U.S. EPA ID Number: MID000263871

7. Transporter 2 Company Name — U.S. EPA ID Number:

8. Designated Facility Name and Site Address
Wayne Disposal Inc
49350 North I-94 Service Drive
Belleville, MI 48111
Facility's Phone: (800) 592-5489
U.S. EPA ID Number: MID048090633

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. RQ, UN3432, POLYCHLORINATED BIPHENYLS, SOLID, 9, PG II ()	1	CM	9,750	K	PCB1
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
1.J135111WDI ERG#171
PO# W140526046
OSD: 11/17/14 ID# CHRT26877-1223

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: [signature] Signature: [signature] Month 12 Day 23 Year 14

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: Date leaving U.S.:
Transporter signature (for exports only):

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Daniel Myers Signature: [signature] Month 12 Day 23 Year 14
Transporter 2 Printed/Typed Name: Signature: Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator) U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. PCB 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Ian Bruce Signature: [signature] Month 12 Day 23 Year 14

GENERATOR — INT'L — TRANSPORTER — DESIGNATED FACILITY

DESIGNATED FACILITY TO GENERATOR

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

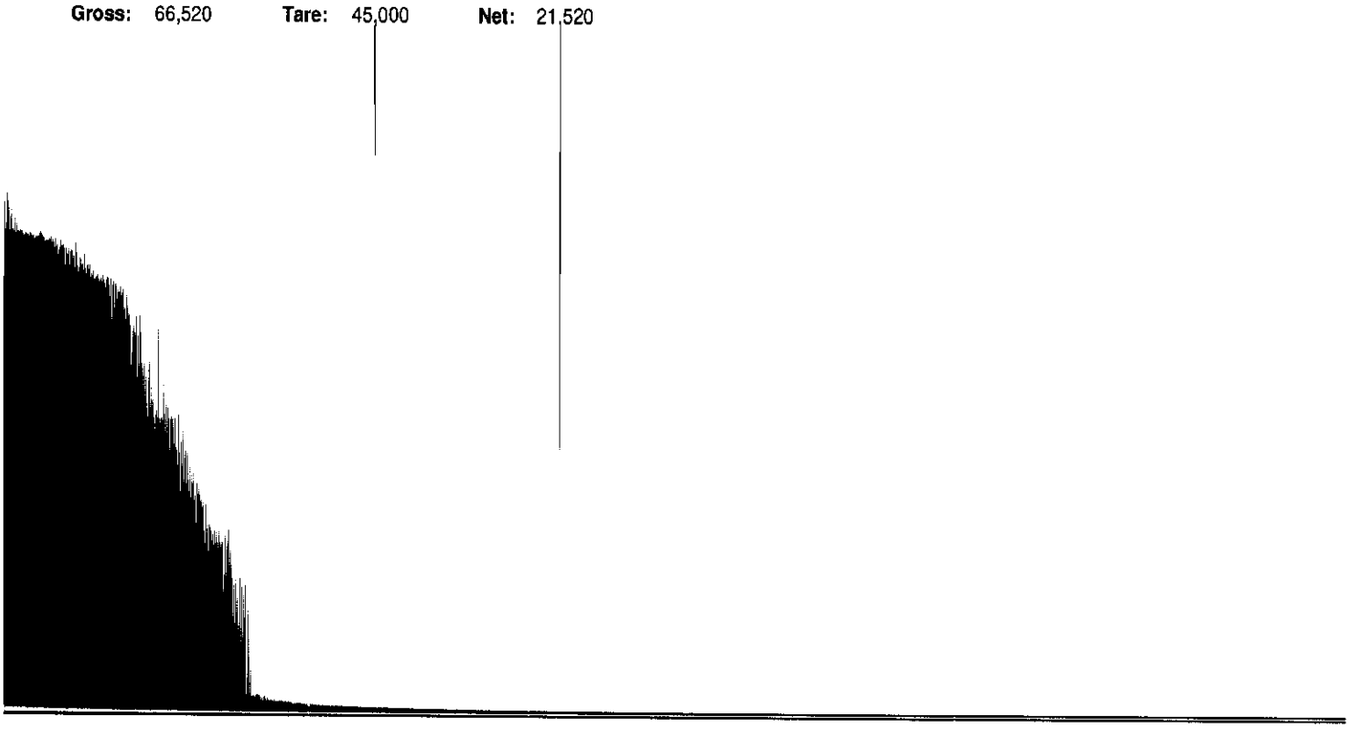
Wayne Disposal, Inc.
49350 North I-94 Service Drive, Belleville, Michigan 48111

Receipt

CLEAN HARBORS OF BRAINTREE
42 LONGWATER DRIVE PO Box 9149
ATTN: CENTRAL LOGISTIC DEPT
NORWELL , MA 02061-9149

Receipt ID: 1246594
EQ Account #: 2540
Manifest / BOL: 008078456FLE
Transporter: EQISYPSI
Date: 12/23/2014
Time In: 2:25 PM
Time Out: 4:26 PM

Line	Description Generator	Qty. Unit
1 - 1	J135111WDI - PCB contaminated garnet	10.760 TONS
	Hazardous Surcharge Ton	10.760 TONS
	OHD000817312 GE AIRCRAFT ENGINES	
	Gross: 66,520 **Tare:** 45,000 **Net:** 21,520	
2	J135111WDI-TONS Additional charge due to load minimum	1.240 TONS
	OHD000817312 GE AIRCRAFT ENGINES	
	Gross: 66,520 **Tare:** 45,000 **Net:** 21,520	
3	Roll-Off/ Hand-Off Fee per Day, Up to 6 Loads	1.000 EACH
	OHD000817312 GE AIRCRAFT ENGINES	
	Gross: 66,520 **Tare:** 45,000 **Net:** 21,520	
5	Wayne Disposal Host Community Agreement Royalty Fee	10.760 TONS
	OHD000817312 GE AIRCRAFT ENGINES	
	Gross: 66,520 **Tare:** 45,000 **Net:** 21,520	



CN CN783329-001 SC PPW 12/1/2008

Form Approved. OMB No. 2050-0039

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

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: OHD000317312
2. Page 1 of 1
3. Emergency Response Phone: (800) 483-3713
4. Manifest Tracking Number: 008078457 FLE

5. Generator's Name and Mailing Address: GE Aircraft Engines, One Neumann Way, Mail Drop N123, Cincinnati, OH 45215, (513) 243-5997, ATTN: Jeff Gati

Generator's Site Address (if different than mailing address): One Neumann Way MD N123, Cincinnati, OH 45215

Generator's Phone:

6. Transporter 1 Company Name: EQ Industrial Services Inc — U.S. EPA ID Number: MID000263871

7. Transporter 2 Company Name — U.S. EPA ID Number:

8. Designated Facility Name and Site Address: Wayne Disposal Inc, 49350 North I-94 Service Drive, Belleville, MI 48111 — U.S. EPA ID Number: MID048090633

Facility's Phone: (800) 592-5489

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. RQ, UN3432, POLYCHLORINATED BIPHENYLS, SOLID, 9, PG II	1	CM	7,205	K	PCB
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information: PO# W140526046

LOT NUMBER: 4P5417L

OSD: 12/2/14 ID# CHRT26280-1233

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Tim Oates — Signature: [signature] — Month 12 Day 23 Year 14

16. International Shipments: ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: Date leaving U.S.:

Transporter signature (for exports only):

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: ANTHONY OWESTER — Signature: [signature] — Month 12 Day 23 Year 14

Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy

18a. Discrepancy Indication Space: ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number: U.S. EPA ID Number

18b. Alternate Facility (or Generator)

Facility's Phone: Month Day Year

18c. Signature of Alternate Facility (or Generator)

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1. PCB 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name — Signature — Month Day Year

GENERATOR — INT'L — TRANSPORTER — DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

008078457FLE

CN CN7633229-004 SC PPW 12/1/2008

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

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: OHD000817312
2. Page 1 of 1
3. Emergency Response Phone: (800) 483-3715
4. Manifest Tracking Number: 008078457 FLE

5. Generator's Name and Mailing Address: GE Aircraft Engines, One Neumann Way, Mail Drop N123, Cincinnati, OH 45215

Generator's Site Address (if different than mailing address): One Neumann Way MD N4-RR, Cincinnati, OH 45215

Generator's Phone: (513) 243-5997 ATTN: Jeff Gatl

6. Transporter 1 Company Name: EQ Industrial Services Inc — U.S. EPA ID Number: MID000268671 MIR 000029711

7. Transporter 2 Company Name — U.S. EPA ID Number:

8. Designated Facility Name and Site Address: Wayne Disposal Inc, 49350 North I-94 Service Drive, Belleville, MI 48111 — U.S. EPA ID Number: MID048090633

Facility's Phone: (800) 592-5489

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. RQ, UN3432, POLYCHLORINATED BIPHENYLS, SOLID, 9, PG II ()	1	CM	7205	K	PCB
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
1. J135111WDI ERG#171 PO# 0140526076
SD: 12/2/14 ID# CHB726280-1223

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: [illegible] — Signature: [signature] — Month 12 Day 23 Year 14

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: ANTHONY WESTON — Signature: [signature] — Month 12 Day 23 Year 14
Transporter 2 Printed/Typed Name: — Signature: — Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. PCB 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Dan Shelton — Signature: [signature] — Month 12 Day 23 Year 14

GENERATOR — INT'L — TRANSPORTER — DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR

Wayne Disposal, Inc.

49350 North I-94 Service Drive, Belleville, Michigan 48111

Receipt

CLEAN HARBORS OF BRAINTREE
42 LONGWATER DRIVE PO Box 9149
ATTN: CENTRAL LOGISTIC DEPT
NORWELL , MA 02061-9149

Receipt ID: 1246596
EQ Account #: 2540
Manifest / BOL: 008078457FLE
Transporter: EQISYPSI
Date: 12/23/2014
Time In: 2:55 PM
Time Out: 5:10 PM

Line	Description Generator	Qty. Unit
1 - 1	J135111WDI - PCB contaminated garnet	8.120 TONS
	Hazardous Surcharge Ton	8.120 TONS
	OHD000817312 GE AIRCRAFT ENGINES	
	Gross: 62,700 **Tare:** 46,460 **Net:** 16,240	
2	J135111WDI-TONS Additional charge due to load minimum	3.880 TONS
	OHD000817312 GE AIRCRAFT ENGINES	
	Gross: 62,700 **Tare:** 46,460 **Net:** 16,240	
5	Wayne Disposal Host Community Agreement Royalty Fee	8.120 TONS
	OHD000817312 GE AIRCRAFT ENGINES	
	Gross: 62,700 **Tare:** 46,460 **Net:** 16,240	

NO SALVAGING ON PREMISES

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) CN CN7633229-004 SC PPW 12/1/2008 Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
OHD000817312	1	(800) 483-3718	008078458 FLE

5. Generator's Name and Mailing Address
GE Aircraft Engines
One Neumann Way, Mail Drop N123
Cincinnati, OH 45215
Generator's Phone: (513) 243-3997 ATTN: Jeff Gati

Generator's Site Address (if different than mailing address)
One Neumann Way MD N123
Cincinnati, OH 45215

6. Transporter 1 Company Name: EQ Industrial Services Inc — U.S. EPA ID Number: MID000263871

7. Transporter 2 Company Name — U.S. EPA ID Number:

8. Designated Facility Name and Site Address
Wayne Disposal Inc
49350 North I-94 Service Drive
Belleville, MI 48111
Facility's Phone: (800) 592 5489
U.S. EPA ID Number: MID048090633

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
x	1. RQ, UN3432, POLYCHLORINATED BIPHENYLS, SOLID, 9, PG II ()	1	CM	11,300	K	PCB1		
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information
PO # W140526046
OSD: 12/2/14 ID Box # 26543-1229

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Jim Oakes — Signature: — Month 12 Day 29 Year 14

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: DAN GIRAUD — Signature: — Month 12 Day 29 Year 14
Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. PCB 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name — Signature — Month Day Year

GENERATOR — INT'L — TRANSPORTER — DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Wayne Disposal, Inc.

49350 North I-94 Service Drive, Belleville, Michigan 48111

Receipt Preview

CLEAN HARBORS OF BRAINTREE
42 LONGWATER DRIVE PO Box 9149
ATTN: CENTRAL LOGISTIC DEPT
NORWELL , MA 02061-9149

Receipt ID: 1246650
EQ Account #: 2540
Manifest / BOL: 008078458FLE
Transporter: EQISYPSI
Date: 12/29/2014
Time In: 2:40 PM
Time Out: 4:59 PM

Line	Description	Qty. Unit
	Generator	
1 - 1	J135111WDI - PCB contaminated garnet	11.680 TONS
	Hazardous Surcharge Ton	11.680 TONS
	OHD000817312 GE AIRCRAFT ENGINES	
	Gross: 67,700 **Tare:** 44,340 **Net:** 23,360	
2	J135111WDI-TONS Additional charge due to load minimum	0.320 TONS
	OHD000817312 GE AIRCRAFT ENGINES	
	Gross: 67,700 **Tare:** 44,340 **Net:** 23,360	
5	Wayne Disposal Host Community Agreement Royalty Fee	11.680 TONS
	OHD000817312 GE AIRCRAFT ENGINES	
	Gross: 67,700 **Tare:** 44,340 **Net:** 23,360	

NO SALVAGING ON PREMISES

3. PCB-ACM Waste

CN7633229-003 SC PPW 8/6/2013

Form Approved. OMB No. 2050-0039

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

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: OHD000817312

2. Page 1 of 1

3. Emergency Response Phone: (800) 483-3718

4. Manifest Tracking Number: 007035732 FLE

5. Generator's Name and Mailing Address
General Electric Engine
One Neumann Way, Mail Drop N123
Cincinnati, OH 45215
Generator's Phone: (513) 243-5997 ATTN:Jeff Gati

Generator's Site Address (if different than mailing address)
One Neumann Way MD N123
Cincinnati,OH 45215

6. Transporter 1 Company Name: EQ Industrial Services Inc
U.S. EPA ID Number: MID000263871

7. Transporter 2 Company Name
U.S. EPA ID Number:

8. Designated Facility Name and Site Address
Wayne Disposal Inc
49350 North I-94 Service Drive
Belleville, MI 48111
Facility's Phone: (800) 592-5489
U.S. EPA ID Number: MID048090633

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. RQ, NA2212, ASBESTOS, 9, PG III	1	CM	3,300	K	PCB1		
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information
1.J137110WDI ERG#171

PO# W130398596 OSD: 10/24/13 ID# CHRT25259-1024

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Jim Oakes
Signature
Month Day Year: 10 24 13

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Date leaving U.S.:
Transporter signature (for exports only):

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: ANTHONY WESTER
Signature
Month Day Year: 10 24 13

Transporter 2 Printed/Typed Name
Signature
Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:
U.S. EPA ID Number

18b. Alternate Facility (or Generator)

Facility's Phone:
Month Day Year

18c. Signature of Alternate Facility (or Generator)

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. PCB 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name
Signature
Month Day Year

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

GENERATOR — INT'L — TRANSPORTER — DESIGNATED FACILITY

Previous editions are obsolete.

007035733FLE

CN7633229 Line 2

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) CN7633229-003 SC FPW 8/6/2013 Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: OHD000817312
2. Page 1 of 1
3. Emergency Response Phone: (800) 483-3718
4. Manifest Tracking Number: 007035733 FLE

5. Generator's Name and Mailing Address
General Electric Engine
One Neumann Way, Mail Drop N123
Cincinnati, OH 45215
Generator's Phone: (513) 243-5987 ATTN: Jeff Gall

Generator's Site Address (if different than mailing address)
One Neumann Way MD N123
Cincinnati, OH 45215

6. Transporter 1 Company Name: EQ Industrial Services Inc — U.S. EPA ID Number: MID000263871

7. Transporter 2 Company Name — U.S. EPA ID Number:

8. Designated Facility Name and Site Address
Wayne Disposal Inc
49350 North I-94 Service Drive
Belleville, MI 48111
Facility's Phone: (800) 592-5489
U.S. EPA ID Number: MID048080633

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. RQ, NA2212, ASBESTOS, 9, PG III ()	1	CM	7,000	K	PCB1
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
1.J137110WDI ERG#171
PO: W10403586 OSD: 11/08/13 ID: CHI2563-1108

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: [signature] Signature: [signature] Month 11 Day 8 Year 13

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Anthony Wester Signature: [signature] Month 11 Day 8 Year 13
Transporter 2 Printed/Typed Name: Signature: Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Actual weight 4018 kg ok per Glenn topping w/ EQ Northeast SC 11/11/13
Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator) Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. PCB 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: [signature] Signature: [signature] Month 11 Day 8 Year 13

GENERATOR / INT'L / TRANSPORTER / DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR

Wayne Disposal, Inc.
49350 North I-94 Service Drive, Belleville, Michigan 48111

Receipt

EO NORTHEAST
185 INDUSTRIAL ROAD
PO BOX 617
WRENTHAM, MA 02093

Receipt ID: 1235212
EQ Account #: 1125
Manifest / BOL: 007035733FLE
Transporter: EQISYPSI
Date: 11/08/2013
Time In: 1:52 PM
Time Out: 3:44 PM

Line	Description Generator	Qty. Unit
1 - 1	J137110WDI - PCB contaminated ACM	25.000 YARD
	Hazardous Surcharge Cubic Yard-Bulk	25.000 YARD
	OHD000817312 GE AIRCRAFT ENGINES	
	Gross: 55,060 **Tare:** 46,220 **Net:** 8,840	
4	Wayne Disposal Host Community Agreement Royalty Fee	25.000 YARD
	OHD000817312 GE AIRCRAFT ENGINES	
	Gross: 55,060 **Tare:** 46,220 **Net:** 8,840	

Line 2

NO SALVAGING ON PREMISES

CN7633229-003 SC PPW 8/6/2013

Form Approved. OMB No. 2050-0039

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

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: OHD000817312
2. Page 1 of 1
3. Emergency Response Phone: (800) 483-3718
4. Manifest Tracking Number: 007035734 FLE

GENERATOR

5. Generator's Name and Mailing Address
General Electric Engine
One Neumann Way, Mail Drop N123
Cincinnati, OH 45215
(513) 243-5997 ATTN:Jeff Gati

Generator's Site Address (if different than mailing address)
One Neumann Way MD N123
Cincinnati,OH 45215

Generator's Phone:

6. Transporter 1 Company Name: EQ Industrial Services Inc
U.S. EPA ID Number: MID000263871

7. Transporter 2 Company Name
U.S. EPA ID Number

8. Designated Facility Name and Site Address
Wayne Disposal Inc
49350 North I-94 Service Drive
Belleville, MI 48111
Facility's Phone: (800) 592-5489
U.S. EPA ID Number: MID048090633

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. RQ, NA2212, ASBESTOS, 9, PG III ( )	1	CM	7,750	K	PCB1		
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information
1.J137110WDI ERG#171

PO: W10403586 OSD: 11/08/13 ID: CHRT25148-1108

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Tim Oakes
Signature
Month 11 Day 08 Year 13

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Sam Cook
Signature
Month 11 Day 8 Year 13
Transporter 2 Printed/Typed Name
Signature
Month Day Year

DESIGNATED FACILITY

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1. PCB	2.	3.	4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name
Signature
Month Day Year

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) CN7633229-003 SC PPW 8/6/2013 Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: OHD000817312
2. Page 1 of 1
3. Emergency Response Phone: (800) 483-3718
4. Manifest Tracking Number: 006833749 FLE

5. Generator's Name and Mailing Address
GE Aircraft Engines
One Neumann Way, Mail Drop N123
Cincinnati, OH 45215
Generator's Phone: (513) 243-5997 ATTN:Jeff Gati

Generator's Site Address (if different than mailing address)
One Neumann Way MD N123
Cincinnati,OH 45215

6. Transporter 1 Company Name: EQ Industrial Services Inc — U.S. EPA ID Number: MID000263871

7. Transporter 2 Company Name — U.S. EPA ID Number:

8. Designated Facility Name and Site Address
Wayne Disposal Inc
49350 North I-94 Service Drive
Belleville, MI 48111
Facility's Phone: (800)592-5489
U.S. EPA ID Number: MID048090633

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. RQ, NA2212, ASBESTOS, 9, PG III ( )	1	CM	7,500	K	PCB1
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
1.J137110WDI ERG#171
Transportation# W1404208 76
Disposal# W1404208 77 OSD: 11/08/13 ID# CHRT 24560-0109

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Jim Cole — Signature: — Month 01 Day 09 Year 14

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Anthony Weston — Signature: — Month 01 Day 09 Year 14
Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. PCB 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name — Signature — Month Day Year

GENERATOR — INT'L — TRANSPORTER — DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete. DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) CN7633229-003 ~~CC RPW~~ 8/6/2013 Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: OHD000817312
2. Page 1 of 1
3. Emergency Response Phone: (800) 483-3718
4. Manifest Tracking Number: 007035762 FLE

5. Generator's Name and Mailing Address
GE Aircraft Engines
One Neumann Way, Mail Drop N123
Cincinnati, OH 45215
Generator's Phone: ~~(513) 243-5907~~ ~~ATTN:Jeff Gati~~

Generator's Site Address (if different than mailing address)
One Neumann Way MD N123
Cincinnati,OH 45215

6. Transporter 1 Company Name: EQ Industrial Services Inc — U.S. EPA ID Number: MID000263871
7. Transporter 2 Company Name — U.S. EPA ID Number:
8. Designated Facility Name and Site Address
Wayne Disposal Inc
49350 North I-94 Service Drive
Belleville, MI 48111
Facility's Phone: ~~(800) 592-5489~~
U.S. EPA ID Number: MID048090633

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. RQ, NA2212, ASBESTOS, 9, PG III ( )	1	CM	8,000	K	PCB1
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
1. J137110WDI ERG#171
Transportation PO # W140420877
Disposal PO # W140420876 OSD: 10/25/13 ID# CHRT2514R-0109

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Jim Eckes — Signature: — Month 01 Day 09 Year 14

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: MATT Rice — Signature: — Month 01 Day 09 Year 14
Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. PCB 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name — Signature — Month Day Year

GENERATOR — INT'L — TRANSPORTER — DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete. DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) CN7633229-003 SC PPW 8/6/2013 Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: OHD000817312
2. Page 1 of: 1
3. Emergency Response Phone: (800) 483-3718
4. Manifest Tracking Number: 007035763 FLE

5. Generator's Name and Mailing Address
GE Aircraft Engines
One Neumann Way, Mail Drop N123
Cincinnati, OH 45215
Generator's Phone: (513) 243-5997 ATTN: Jeff Gati

Generator's Site Address (if different than mailing address)
One Neumann Way MD N123
Cincinnati, OH 45215

6. Transporter 1 Company Name: EQ Industrial Services Inc — U.S. EPA ID Number: MID000263871

7. Transporter 2 Company Name — U.S. EPA ID Number:

8. Designated Facility Name and Site Address
Wayne Disposal Inc
49350 North I-94 Service Drive
Belleville, MI 48111
Facility's Phone: (800) 592-5489
U.S. EPA ID Number: MID048090633

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. RQ, NA2212, ASBESTOS, 9, PG III ( )	1	CM	5,000	K	PCB1
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
1. J137110WDI ERG#171
PO# Disposal - W140420876 Transportation - W140420872
OSD: 11/15/13 ID#CHRT26359-0109

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Tim Oakes — Signature: [signature] — Month 01 Day 09 Year 14

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Date leaving U.S.:
Transporter signature (for exports only):

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Dan Girard — Signature: [signature] — Month 01 Day 09 Year 14
Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. PCB 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name — Signature — Month Day Year

GENERATOR — INT'L — TRANSPORTER — DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) CN CN7633229-003 SC PPW 5/22/2014 Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: OHD000817312
2. Page 1 of: 1
3. Emergency Response Phone: (800) 483-3718
4. Manifest Tracking Number: 007035783 FLE

5. Generator's Name and Mailing Address
GE Aircraft Engines
One Neumann Way, Mail Drop N123
Cincinnati, OH 45215
Generator's Phone: (513) 243-5997 ATTN:Jeff Gati

Generator's Site Address (if different than mailing address)
One Neumann Way MD N123
Cincinnati,OH 45215

6. Transporter 1 Company Name: EQ Industrial Services Inc — U.S. EPA ID Number: MID000263871

7. Transporter 2 Company Name — U.S. EPA ID Number:

8. Designated Facility Name and Site Address
Wayne Disposal Inc
49350 North I-94 Service Drive
Belleville, MI 48111
Facility's Phone: (800) 592-5489
U.S. EPA ID Number: MID048090633

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. RQ, NA2212, ASBESTOS, 9, PG III ()	1	CM	2,800	K	PCB1
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
ID# CHRT26542 OSD: 05-08-14
1.J137110WDI ERG#171
Disposal PO# W140465709
Transportation PO# W140465728

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: JEFF GATI — Signature: [signature] — Month 06 Day 09 Year 14

INT'L
16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER
17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: DAN GIRUD — Signature: [signature] — Month 06 Day 09 Year 14
Transporter 2 Printed/Typed Name — Signature — Month Day Year

DESIGNATED FACILITY
18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) — Month Day Year
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. PCB 2. 3. 4.
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name — Signature — Month Day Year

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete. DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)