RCRA INSPECTION FORM

Report Prepared for:

Generator ☒

Transporter ☐

HWM (TSD) facility ☒

Copy of report sent to the facility ☒

Facility Information

Name: American Bank Note Co

Address: Tiffany St & Garrison Ave
Bronx, NY 10474

EPA ID#: NYD091214718

Date of Inspection: July 8, 1982

Participating Personnel

~~State or~~ EPA Personnel: Janet DeBiasio, SWB
Evan Liblit, SWB

Facility Personnel: Tony LaCapria, Director of Research
John Volpe, Assist. Mgr Engraving Div.
John Camp, Superintendent of Ink Dept.

Report Prepared by Name: Janet G DeBiasio

Agency: US EPA, Solid Waste Branch

Telephone #: 212/264-1828

Approved for the Director by: [signature]

Is there reason to believe that the facility has hazardous waste on-site?

a. If yes, what leads you to believe it is hazardous waste? Check appropriate boxes:

☒ Company admits that its waste is hazardous during the inspection.

☒ Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application.

☐ The waste material is listed in the regulations as a hazardous waste from a nonspecific source (§261.31)

☐ The waste material is listed in the regulations as a hazardous waste from a specific source (§261.32)

☐ The material or product is listed in the regulations as a discarded commercial chemical product (§261.33)

☐ Testing has shown characteristics of ignitability, corrosivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report)

☒ Company is unsure but there is reason to believe that waste materials are hazardous. (Explain)

The non-empty pails of ink maybe hazardous because of the lead concentration.

Am. Bank
7/8/82

GENERATOR INSPECTION CHECKLIST

40 CFR 262 Subpart A-General

	YES	NO	N/A
262.11 - Hazardous waste determination			
1) Did the generator test its waste to determine whether it is hazardous?			
Is the waste hazardous?			
2) Is the generator determining that its waste exhibits a hazardous waste characteristic(s) based on its knowledge of the material(s) or processes used?	X		

40 CFR 262 Subpart B-The Manifest

Has hazardous waste been shipped off-site since November 19, 1980?	X		

If yes, approximately how many shipments, off-site, have been made and describe the approximate size of an average shipment made on a monthly basis. If facility is a small quantity generator, please explain. K086 is shipped offsite via municiple trashe every 2 months. The quantity varies but the average is 1/3 drum.

262.21 Does each manifest (or representative sample) have the following information? Please circle the missing elements. No Cyanide waste has been shipped offsite.

No manifests have ever been used.

— a manifest document number?		X	
— the generators name, mailing address, telephone number and EPA I.D. Number?		X	
— the transporters name and EPA I.D. Number?		X	
— the name, address and EPA ID Number of the designated facility?		X	
— a description of the wastes (DOT)?		X	
— the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle?		X	
— a certification that the materials are properly classified, described, package, marked and labeled, and are in proper condition for transportation under regulations of the DOT and EPA?		X	
(obtain a copy of the incomplete manifests)		X	

40 CFR 262 - Subpart D - Recordkeeping and Reporting

262.40 Has the generator maintained facility records since Nov. 19, 1980? (manifest, exception report and waste analysis)		X	
262.42 Has the generator received signed copies (from the TSD facility) of all the manifests for waste shipped off-site more than 35 days ago?			X
If not, have Exception Reports been submitted to EPA covering any of these shipments made more than 45 days ago?			

	YES	NO	N/A
40 CFR 262 - Subpart C - Pretransportation Requirements			
262.30-33 Before transporting or offering hazardous waste for transportation off-site does the generator:			
1) Package the waste in accordance with applicable DOT regulations (i.e., 49 CFR Parts 173, 178 & 179)		X	
2) Label each package according to DOT (i.e., 49 CFR 172)		X	
3) Mark each package according to DOT (i.e., 49 CFR 172)		X	
4) Mark each container of 110 gallons or less with the words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. EPA," and include the generators name, address and manifest document number. (i.e., 49 CFR 172.304)		X	
262.34 Accumulation Time			
1) How is waste accumulated on-site?			
☒ Containers			
☐ Tanks			
☐ Surface impoundments (complete HWMF checklist)			
☐ Piles (complete HWMF checklist)			
2) Is waste accumulated for more than 90 days?	X		
If yes, complete HWMF checklist			
3) Is each container clearly dated with each period of accumulation so as to be visible for inspection?		X	
4) Is each container or tank marked or labeled with the words "hazardous waste" or in compliance with the DOT labeling requirements?		X	

However the waste cyanide is locked in a fenced in area with a sign on the fence indicated what the waste is.

STOP HERE IF THE HAZARDOUS WASTE MGT FACILITY (TSD) CHECKLIST IS FILLED OUT

for [redacted] non empty containers of waste ink.

262.34 - SHORT TERM ACCUMULATION STANDARDS

(For generators who accumulate waste in tanks or containers for 90 days or less)

40 CFR 265 - Subpart I Containers	YES	NO	N/A
265.170 - What type of containers are used for storage. Describe the size, type and quantity and nature of waste (e.g., 12 fifty-five gallon drums of waste acetone). 50 plus pails with more than one inch of waste ink in them. Pails are 1gallon size.			
265.171 - Do the containers appear to be in good condition, not in danger of leaking?	X		
If not, please describe the type, condition and number of leaking or corroded containers. Be detailed and specific.			
265.172 - Are hazardous waste stored in containers made of compatible materials?	X		
If not, please explain.			
265.173(a) - Are all containers closed except those in use?		X	
265.173(b) - Do containers appear to be properly opened, handled or stored in a manner which will minimize the risk of the container rupturing or leaking?		X	
265.174 - Is the storage area inspected at least weekly?		X	
265.176 - Are containers holding ignitable and reactive waste located at least 50 feet (15 meters) away from the facility's property line?	X		
265.177 - Are incompatible wasts stored separate from each other?	X		

Am Bank

HAZARDOUS WASTE MANAGEMENT FACILITY CHECK LIST
(Facilities Subject to 40 CFR 265 Standards)

	YES	NO	N/A
40 CFR Part 265 Subpart B General Facility Standards			
265.13-General Waste Analysis			
1) Is there a detailed chemical and physical anaylsis of a representative sample of the waste or each waste? (At a minimum this analysis must contain all the information necessary for proper management of the waste) The CN waste has been analyzed but not the K086 waste		X	
2) Does the character of the waste handled at the facility change from day to day, week to week, etc., thus requiring frequent testing? You may check only one			
Waste characteristics vary ____			
All waste are basically the same X			
Company treats all waste as hazardous ____			
3) Is there a written waste analysis plan at the facility?		X	
Does it contain the following:			
a) Parameters for each waste to be analyzed and the rationale for the selection of these parameters.			
b) Test methods used to test these parameters.			
c) Sampling methods to obtain a representative sample of the waste to be analyzed.			
d) Frequency of repeated analysis to ensure accurate and current information.			
4) Does hazardous waste come to this facility from an outside source? e.g. another generator.		X	
5) If waste comes from an outside source, are there procedures in the plan to insure that waste received conforms to the accompanying manifest?			X
265.14-Security			
1) Is there: a) a 24-hour surveillance system? or, b) a suitable barrier which completely surrounds the active portion of this facility?	X		
2) Are there "Danger-Unauthorized Personnel Keep Out" signs posted at each entrance to the facility?	X		
If no, explain what measures are taken for security.			
265.15 - General Inspections Requirements			
1) Does the facility have a written inspection schedule?		X	
2) Does the schedule identify the types of problems to be looked for and the frequency of inspections?		X	
3) Does the owner/operator record inspections in a log?		X	
4) Is there evidence that problems reported in the inspection log have been remedied?		X	
If no, please explain.			

When the CN treatment system is in place they will have a waste analysis plan

265.16 - Personnel Training	YES	NO	N/A
1) Have facility personnel successfully completed a program of classroom instruction or on-the-job training within 6 months of having been employed?	X		
If yes, have facility personnel taken part in an annual review of training?	X		
2) Is there written documentation of the following:			
—job title for each position at the facility related to hazardous waste management and the name of the employee filling each job?	X		
—type and amount of training to be given to personnel in jobs related to hazardous waste management?	X		
—actual training or experience received by personnel?	X		
3) Are training records kept on all employees for at least 3 years?	X		

265.17-General Requirements for Ignitable, Reactive or Incompatible Wastes			
1) Are there ignitable, reactive or incompatible waste on site?		X	
If yes, what are the approximate types and quantities and location of the waste.			
2) Have precautions been taken to prevent accidental ignition or reaction of ignitable or reactive waste?			
If no, please explain.			
3) In your opinion, are proper precautions taken so that these wastes do not:			
— generate extreme heat or pressure, fire or explosion, or violent reaction?			
— produce uncontrolled toxic mist, fumes, dusts or gases in sufficient quantities to pose a risk of fire or explosions?			
— damage the structural integrity of the device or facility containing the waste?			
— threaten human health or the environment?			

40 CFR 265 - Subpart C - Preparedness and Prevention

	YES	NO	N/A
265.32 Does the facility comply with preparedness and prevention requirements including maintaining:			
-- an internal communications or alarm system?	X		
-- a telephone or other device to summon emergency assistance from local authorities?	X		
-- portable fire equipment?	X		
-- water at adequate volume and pressure to supply water hose streams, foam producing equipment, etc.	X		
265.33 Is equipment tested and maintained?	X		
265.34 Is there immediate access to communications or alarm systems during handling of hazardous waste?	X		
265.35 Adequate aisle space?	X		
If no, please explain storage pattern.			
In your opinion, do the types of waste on-site require all of the above procedures, or are some not needed: Explain.	X		

40 CFR 265 - Subpart D - Contingency Plan and Emergency Procedures

Not a contingency plan per se. Rather, an emergency evacuation & shutdown plan plan

	YES	NO	N/A
Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions or any unplanned release of hazardous waste?			
1) Does the plan describe arrangements made with the local authorities?			X
2) Has the contingency plan been submitted to the local authorities?			X
3) Does the plan list names, addresses and phone numbers of Emergency Coordinators?	X		
4) Does the plan have a list of what emergency equipment is available?	X		
5) Is there a provision for evacuating facility personnel?	X		
6) Was there an emergency coordinator present or on call at the time of the inspection?	X		

→ no indication that local authorities have existing arrangements w/ facility

40 CFR 265 Subpart E-Manifest System, Recordkeeping and Reporting

265.71 - Use of the Manifest

	YES	NO	N/A
1) Has the facility received hazardous waste from an off-site source since November 19, 1980?			X
If no, skip to 265.73 - Operating Record			
2) If yes, does it appear that the facility has a copy of a manifest for each hazardous waste load received?			X
If not, please explain.			

	YES	NO	N/A
3) How many post-November 19 manifests does the facility have? (Estimate if the number is large)			
4) Does each manifest have the following information? (circle missing information)			
-- a manifest document number?			X
-- the generators name, mailing address, telephone number and EPA I.D. #?			X
-- the transporters name and EPA I.D. Number?			X
-- the TSD name, address, telephone number & EPA I.D. Number?			X
-- a description of the waste (DOT)?			X
-- the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded; into or onto the transport vehicle?			X
-- a certification that the materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation under regulations of the DOT and EPA?			X
(Obtain a copy of the incomplete manifests)			

265.72 - Manifest Discrepancies

	YES	NO	N/A
Have there been significant discrepancies between the quantity and type of waste received and the waste identified on the manifest?			X
Describe unreconciled descrepancies.			

265.73 - Operating Record

	YES	NO	N/A
1) Does the facility keep an operating record?		X	
2) Does the record contain the following information:			
a) Description and quantity of waste on-site and the method(s) and date(s) of its Treatments, Storage & Disposal?			
b) The location and quantity of each hazardous waste at each location?			
c) Records and results of waste analysis and trial tests performed and identified in the waste analysis plan?			
d) Summary reports and details of all incidents that require implementing the contingency plan.			
e) Records and results of inspections for the past 3 years or November 19, 1980 which ever is less?			
f) Monitoring, testing or analytical data where required for:			
Groundwater, Land Treatment, Incinerators, and Thermal Treatment?			

265.76 - Unmanifested Waste Report

	YES	NO	N/A
Has the facility accepted hazardous waste from off-site sources without a manifest?			X
If yes, has the facility submitted an unmanifested waste report?			X

40 CFR 265 Subpart F - Groundwater Monitoring	YES	NO	N/A
(Applies only to surface impoundments, landfills and/or land treatment facilities.)			
Is a groundwater monitoring plan available at the facility?			X
If yes, please fill out the appropriate Groundwater Monitoring Questionaire and attach to this report.			

40 CFR 265 Subpart G - Closure and Post-Closure

265.111 Closure Performance Standard

Have any portions of the facility been closed since November 19, 1980?		X	
If yes, please explain			

265.112 - Closure Plan

Does the facility have a written closure plan? (Applies to all types of TSD facilities)		X	
If yes, does the written plan include:			
1. A description of how and when the facility will be partially (if applicable) and ultimately closed?			
2. An estimate of the maximum inventory of wastes in storage or treatment at any time during the life of the facility?			
3. A description of the steps necessary to decontaminate facility equipment during closure?			
4. A schedule for final closure including the anticipated date when waste will no longer be received and when final closure will be completed?			
5. Does the owner/operator have a written estimate of of the cost of closing the facility?			
If yes, what is it? ($)			

265.118 - Post Closure Plan

Does the facility have a written post-closure plan? (Applies only to disposal facilities)			X
If yes, Does the Plan:			
1. Identify the activities which will be carried on after closure and the frequency of these activities?			
2. Include a description of planned groundwater monitoring activities and their frequency during post-closure?			
3. Include a description of planned maintenance activities and frequency to insure integrity of final cover during post-closure?			
4. Include the name, address and phone number of a person or office to contact during post-closure?			
5. Does the owner/operator have a written estimate of the cost of post-closure for the facility?			
If yes, what is it? ($)			

Please circle all appprcpriate activities and answer questions on indicated pages for all activities circled.

Storage	Treatment	Disposal
Container - pg 6	Tank - pg 7	Landfill - pg 11
Tank, above ground-pg 7	Surface Impoundment-pg 8	Land Treatment - pg 10
Tank, below ground-pg 7	Incineration - pg 12	Surface Impoundments - pg 8
Surface Impoundments-pg 8	Thermal Treatment- pg 12	Other_____
Waste Piles - pg 9	Land Treatment - pg 10	
Other_____	Chemical, Physical and Biological Treatment - pg 13	
	Other_____	

For drums of NaCN + Carbon

	YES	NO	N/A
40 CFR 265 - Subpart I - Containers			
1) - What type of containers are used for storage. Describe the size, type, quantity and nature of waste (e.g. 12 fifty-five gallon drums of waste acetone) 25, 50 gallon drums + 9, 10gal drums of NaCN with Carbon.			
2) - Is there a containment system for spills, leaks and precipitation? If yes, describe.		X	
265.171 - Do the containers appear to be in good condition, not in danger of leaking? If not, please describe the type, condition and number of leaking or corroded containers. Be detailed and specific.	X		
265.172 - Are hazardous waste stored in containers made of compatible materials? If not, please explain.	X		
265.173(a) - Are all containers closed except those in use?	X		
265.173(b) - Do containers appear to be properly opened, handled or stored in a manner which will minimize the risk of the container rupturing or leaking?	X		
265.174 - Is the storage area inspected at least weekly?	X		
265.176 - Are containers holding ignitable and reactive waste located at least 50 feet (15 meters) away from the facility's property line?	X		
265.177 - Are incompatible wastes stored separate from each other? If no, explain	X		

7/28. C12

RECEIVED

ENVIRONMENTAL PROTECTION AGENCY, REGION II NEW YORK, N.Y.

1986 JUL 30 PM 1:49

PERMITS ADMINISTRATION BRANCH

Orig: Andy B. your move.

Cc: Ray S. FYI and update HAORS?

American Bank Note Company
1241 Lafayette Avenue
Bronx, N.Y. 10474

Not in RDS

NYD 091214718

July 25, 1986

P32 = AR
P33 = FC
C12 - 6/26/86
C1105 = 6

Mr. Richard A. Baker
Chief
Permits Administration Branch
U. S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, New York 10278

Dear Mr. Baker:

This letter constitutes a formal request to deny the Part B Permit for the hazardous waste storage facility which we had been operating under the interim status and which now has been closed and the Engineering Certification for the closure has been accepted by the New York State Department of Environmental Conservation.

A copy of the NYSDEC letter of acceptance of the Engineering Certification is attached.

Sincerely,

S.W. Paul Wyszkowski

S.W. Paul Wyszkowski
Senior Director of Research

/lv

attachment

Mr. Richard A. Baker

copies to: Mr. Stanley Siegel ✓ (no attachment!)
Chief
Compliance and Enforcement Section
U.S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, N. Y. 10278

Mr. John L. Middelkoop, P.E.
Supervisor
Permit Section
Division of Solid and Hazardous Waste
Room 401
New York State Department of Environmental Conservation
50 Wolf Road
Albany, N. Y. 12233

Mr. Sudhir Jagirdar
Regional Hazardous Waste Engineer
New York State Department of Environmental Conservation
2 World Trade Center
33rd Floor
New York, N. Y. 10047

Rec. 9/30

~~RAY~~ ↓ PAB

Stan

New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233-0001

Henry G. Williams
Commissioner

September 26, 1985

Mr. S.W. Paul Wyszkowski
Director
Research and Product Development
American Bank Note Company
Garrison Avenue & Tiffany Street
New York, NY 10474

Dear Mr. Wyszkowski:

Re: Bronx Plant Facility, EPA I.D. No. NYD091214718

This letter is to inform you that, upon review of our records, it is deemed that the applicable regulatory requirements in conjunction with closure of the above-referenced facility have been met, and hereby, approval of the closure plan dated March 29, 1985, with addendum dated April 29, 1985 is granted.

Please note that this approval in no way precludes your responsibility to submit closure certification to this office as noted in the closure plan. It is deemed that closure of the referenced facility is not complete, and hence, your firm remains subject to all applicable regulatory fees until such time that the engineering and owner/operator certification is received by this office.

Should you have any questions regarding this notice, please contact Ms. Michelle Taylor at (518) 457-3274.

Sincerely,

Randy S. McDermott, P.E.

Randy S. McDermott, P.E.
Senior Sanitary Engineer
Permit Section
Bureau of Hazardous Waste Technology
Division of Solid and Hazardous Waste

cc: S. Siegel, EPA Region II
S. Jagirdar, Region 2
J. Riordan, Region 2
G. Rider, Region 2

New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233-0001

Henry G. Williams
Commissioner

file

JUN 26 1986

no permitting record

C1105=6 ✓
C1103=$ ✓ 12/4/87 ✓
C119=3 ✓
C305=$ ✓

Mr. S.W. Paul Wyszkowski
Director, Research & Product Development
American Bank Note Company
Garrison Avenue & Tiffany Street
Bronx, New York 10474

Dear Mr. Wyszkowski:

Re: Bronx, New York Facility
EPA I.D. No. NYD091214718

This confirms receipt by this office of Owner/Operator and Engineering Certification for closure of the referenced facility. Upon review of our records, it is deemed that all applicable regulatory requirements in conjunction with closure of the RCRA-permitted portions of the referenced facility have been met.

In order to terminate the facility's interim status, an official formal request to deny the Part B Permit for the subject facility should be made, in writing, to the U.S. Environmental Protection Agency (USEPA). Upon receipt of this request, the USEPA will then publish a Notice of Intent to deny the RCRA Part B application for your facility. Following the required comment period for this notice, you will be notified by the USEPA insofar as termination of your facility's interim status. Please note that this step is legally required in order to have the facility's interim status withdrawn.

The aforementioned request should be forwarded, within 30 days from the date of this letter to:

Mr. Richard A. Baker
Chief
Permits Administration Branch
U.S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, NY 10278

with copies to:

Mr. Stanley Siegel
Chief
Compliance and Enforcement Section
U.S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, NY 10278

Mr. John L. Middelkoop, P.E.
Supervisor
Permit Section
Division of Solid and Hazardous Waste
Room 401
New York State Department of
Environmental Conservation
50 Wolf Road
Albany, NY 12233

Mr. Sudhir Jagirdar
Regional Hazardous Waste Engineer
New York State Department of
Environmental Conservation
2 World Trade Center
33rd Floor
New York, NY 10047

Please note that this approval in no way precludes your responsibility to ensure that hazardous wastes or residues not associated with the hazardous waste container storage area are removed. Region 2 will be in contact if additional testing is required.

If you should have any questions or comments regarding the above, please contact Ms. Michelle Taylor at (518) 457-3274.

Sincerely

Randy S. McDermott, P.E.
Senior Sanitary Engineer
Permit Section
Bureau of Hazardous Waste Technology
Division of Solid and Hazardous Waste

cc: R. Baker, USEPA Region II
S. Siegel, USEPA Region II
J. Middelkoop
S. Jagirdar, Region 2

New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233-0001

Henry G. Williams
Commissioner

JUN 26 1986

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Director, Research & Product Development
American Bank Note Company
Garrison Avenue & Tiffany Street
Bronx, New York 10474

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U.S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, NY 10278

with copies to:

Mr. Stanley Siegel
Chief
Compliance and Enforcement Section
U.S. Environmental Protection Agency
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If you should have any questions or comments regarding the above, please contact Ms. Michelle Taylor at (518) 457-3274.

Sincerely

Randy S. McDermott, P.E.
Senior Sanitary Engineer
Permit Section
Bureau of Hazardous Waste Technology
Division of Solid and Hazardous Waste

cc: R. Baker, USEPA Region II
S. Siegel, USEPA Region II
J. Middelkoop
S. Jagirdar, Region 2

OFFICE COPY

rec'd 4-21-86

New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233-0001

Henry G. Williams
Commissioner

February 12, 1986

Mr. S.W. Paul Wyszkowski
Director
Research and Product Development
American Bank Note Company
Garrison Avenue & Tiffany Street
New York, NY 10474

Dear Mr. Wyszkowski:

Re: Bronx Plant Facility, EPA I.D. No. NYD091214718

On September 26, 1985 this office gave final approval of the RCRA closure plan for the referenced facility. Please note that 6 NYCRR Part 373-3.7 requires that, upon completion of closure, both the facility owner or operator and an independent, registered professional engineer must certify that the facility has been closed in accordance with the specifications contained in the approved closure plan. If all closure activities are complete, please submit the closure certification to this office within 30 days of the date of this letter. If closure is not yet complete, such certification should be submitted within 30 days of completion of closure.

Please note that the facility is not considered to have satisified all of the requirements for a change of status until the required certifications have been received by this office. Additionally, a post-closure inspection by this Division may be required.

If you have any questions regarding this notice, please contact Ms. Michelle Taylor at (518) 457-3274.

Sincerely,

John L. Middelkoop, P.E.
Supervisor
Permit Section
Bureau of Hazardous Waste Technology
Division of Solid and Hazardous Waste

cc: S. Jagirdar
J. Riordan
G. Rider

ENCLOSURE

An acceptable closure plan for a container storage area and/or tank storage facility should include the following sections with the required information as noted below.

I. FACILITY CONDITION

A. General information: This should describe the activities which normally take place in handling hazardous waste at your facility. In addition, this subsection should include:

1. Layout of the facility: site plan of the facility showing paved lots and contours (i.e. indicate depression, flow of local drainage)

2. Location of the areas within the facility where hazardous waste is managed;

3. The size of the facility;

4. The number of tanks with their corresponding capacities, indicating whether they are above or below ground;

5. Waste description (to be filled out for each type of waste in inventory including physical and chemical characteristics of the waste; and

6. Maximum inventory of waste expected to be accumulated prior to disposal.

B. Inventory of equipment involved in daily activities of handling hazardous waste (e.g. waste feed system, conveyors, fork lifts, etc.)

C. Schedule of closure: This subsection should report the time required for completion of closure. This time period should not exceed 180 days. Indicate time frame by which all wastes will be removed, time by which decontamination will be completed, time by which all residues will be removed, and the anticipated date of closure.

II. REMOVING ALL INVENTORY

A. Quantity of waste; including containers, equipment, and accumulated inventory, requiring disposal or treatment.

B. Method of disposal or treatment.

C. Approximate distance to an approved off-site treatment, storage or disposal (TSD) facility.

III. FACILITY DECONTAMINATION

A. List areas with potential soil contamination.

B. Criteria for determining contamination (e.g., number of soil samples, integrity tests, spill history, etc.)

C. List of contaminated equipment.

D. Estimated amount of contaminated soil to be removed for disposal. The amount of displaced soil which must be replaced to grade with clean soil.

E. Method of equipment and storage area cleaning (e.g. steam cleaning, hydro-blasting, etc.) How will you know when equipment and storage areas are totally decontaminated?

F. Quantity of residue expected to accumulate as part of cleaning.

G. Method of disposal for all contaminated soil, equipment and cleaning residue.

IV. CLOSURE CERTIFICATION

A. This section must state that upon completion of closure activities, the closure will be certified, by both the owner or operator of the facility and an independent, registered professional engineer, that the facility will have been closed in accordance with the specifications contained in the approved Closure Plan. In addition, an estimate of the number of periodic inspections to be made by the certifying engineer should be included in this section.

V. CLOSURE COST ESTIMATE

A. A cost estimate covering all the activities as delineated above. In addition this section should include the following:

1. Source of labor
2. Cost of labor
3. Cost of equipment (if to be rented)
4. Cost of closure certification
5. Contingent cost (20 percent of the total cost)
6. Administrative cost (15 Percent of the total cost)

EPA HWCB

RCRIS NOTIFICATION DATA DISCREPANCY FORM

Information from RCRIS	New Information (make change to "E" record only)
Facility Name: American Bank Note Comp.	Facility Name:
Facility EPA ID Number: NYD091214718	Facility EPA ID Number:
Facility Address: Tiffany St. + Garrison Ave	Facility Address:
City: BRONX St: NY Zip: 10474	City: St: Zip:
Mailing Address:	Mailing Address:
City: St: Zip:	City: St: Zip:
Facility Contact: Anthony Lapana Phone: 718-542-9200	Facility Contact: Phone: - -
Owner/Operator:	Owner/Operator:
SIC Code(s):	SIC Code(s):
Waste Codes:	Waste Codes:
Generator Status (LQG/SQG) LQG	Generator Status (LQG/SQG)
Other:	Other:

In response to this request, please modify RCRIS Handler Notification Data for the following:

General Generator Information:

	Facility Name		EPA ID Number
	Facility Address		Mailing Address
	Facility Contact		Phone
	SIC Code(s)		Waste Code(s)
	Other		

Contact: Phone:

Effective Date of Change:

Add/Change Generator Status Codes:

C	#	
	1	conditionally exempt Small Quantity Generator.
	2	Definitionally Excluded Wastes
	3	Delisted Wastes
	4	One-time Hazardous Waste Generator
	5	Periodic Hazardous Waste Generator

C	#	
	6	No longer Generates HW; Still in Business
X	7	No longer Generates HW; Out of Business
	8	Never Generated Hazardous Waste
	9	ID Number to Transport Non-Hazardous Waste
	10	Regulated Under Another ID Number(s) (list below)

Ron Lockwood

John German, Chief, NYCS

Date

Gen 1 = INT

AMERICAN BANK NOTE CO.

DATE RETURNED _____

REASON _____

|__| ACKNOWLEDGEMENT SENT

INTERNAL CHECKLIST ID # NYD091214718

1. Interim Regulatory Requirements

A. (1) FORM 1 MISSING |__|

(2) FORM 3 MISSING |__|

B. POSTMARK after NOVEMBER 19, 1980 |__| Valid |__|

C. (1) DATE of OPERATION MISSING |__|

(2) DATE of OPERATION after NOVEMBER 19, 1980 |__|

D. (1) NON-NOTIFIER |__|

(2) NOTIFIED after AUGUST 18, 1980 11/13. |X| Valid |__|

E. (1) FORM 1, ~~X~~III B SIGNATURE MISSING |__|

(2) FORM 3, IX B SIGNATURE MISSING |__|

2. A. HANDLER |__|

B. NONREGULATED |__|

C. UNSURE |__|

D. UNKNOWN FACILITY (missing name and address on Form 3) |__|

E. NEW FACILITY > NOV. 19, 1980 |__|

F. CORE ITEM(S) MISSING |__|

G. NON-CORE ITEM(S) MISSING |__|

H. OTHER |__|

MISSING:

MAP |X|

DRAWING |__|

PHOTO |__|

Please print or type in the unshaded areas only
(fill-in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175

FORM 1 GENERAL

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program
(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

S		F/A	C
F	NYD091214718	3	D
1	2 - 13	14	15

LABEL ITEMS

- I. EPA I.D. NUMBER
- III. FACILITY NAME
- V. FACILITY MAILING ADDRESS
- VI. FACILITY LOCATION

late attach 1/13

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill—in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill—in area*(s)* below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of **bold—faced terms.**

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED	SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge** to **waters of the U.S.**? (FORM 2A)	16	X 17	18	B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge** to **waters of the U.S.**? (FORM 2B)	19	X 20	21
C. Is this a facility which currently results in **discharges** to **waters of the U.S.** other than those described in A or B above? (FORM 2C)	22	X 23	24	D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge** to **waters of the U.S.**? (FORM 2D)	25	X 26	27
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X 28	29	30	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)	31	X 32	33
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)	34	X 35	36	H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)	37	X 38	39
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)	40	X 41	42	J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)	43	X 44	45

III. NAME OF FACILITY

1 SKIP AMERICAN BANK NOTE COMPANY BRONX PLANT

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*		
2 LACAPRIA ANTHONY RESEARCH DIR.	212	542	9200

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

3 TIFFANY ST. & GARRISON AVE.

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 BRONX NEW YORK	NY	10474

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

5 TIFFANY ST. & GARRISON AVE.

B. COUNTY NAME

BRONX

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE *(if known)*
6 NEW YORK	NY	10474	

CONTINUE ON REVERSE

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
2753 (specify) Engraving and plate printing	(specify)
C. THIRD	**D. FOURTH**
(specify)	(specify)

VIII. OPERATOR INFORMATION

A. NAME: AMERICAN BANK NOTE COMPANY

B. Is the name listed in Item VIII-A also the owner? [X] YES [ ] NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)

F = FEDERAL
S = STATE
P = PRIVATE
M = PUBLIC (other than federal or state)
O = OTHER (specify)

Answer: P (specify)

D. PHONE (area code & no.): A 212 542 9200

E. STREET OR P.O. BOX: TIFFANY ST. & GARRISON AVE.

F. CITY OR TOWN: BRONX, NEW YORK

G. STATE: NY

H. ZIP CODE: 10474

IX. INDIAN LAND

Is the facility located on Indian lands? [ ] YES [X] NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water): 9 N	**D. PSD** (Air Emissions from Proposed Sources): 9 P
B. UIC (Underground Injection of Fluids): 9 U	**E. OTHER** (specify): 9 (specify)
C. RCRA (Hazardous Wastes): 9 R	**E. OTHER** (specify): 9 (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements. FQ: N/50

XII. NATURE OF BUSINESS (provide a brief description)

American Bank Note Company is a security printer, printing foreign currency, Traveler's Checks, securities and other forms of monetary instruments.

FQ: A/51

PERMITS ADMIN. BRANCH REGION II
JUL 6 12 25 PM '81
ENVIRONMENTAL PROTECTION AGENCY
NEW YORK, N.Y. 10007

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
Robert F. Ivey Vice President & Secretary		7/2/81

COMMENTS FOR OFFICIAL USE ONLY

C

Please print or type in the unshaded areas only
(fill-in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

FORM 3 RCRA

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

S													T/A	C
F	N	Y	D	0	9	1	2	1	4	7	1	8	3	1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

C	YR.	MO.	DAY
8	08	01	01

[ ] 2. NEW FACILITY *(Complete item below.)*

FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 1. FACILITY HAS INTERIM STATUS

[ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code*(s)* in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY – For each code entered in column A enter the capacity of the process.

1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S		T/A	C
C	DUP		1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S02	600	G		5				
X-2	T03	20	E		6				
1	S01	1000000	G		7				
2					8				
3					9				
4					10				

Continued from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY – For each **listed waste** entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:
   For listed hazardous waste: For each **listed** hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate **all** the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				*included with above*

 CONTINUE ON PAGE 3

Continued from page 2.
NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)		FOR OFFICIAL USE ONLY	
S: W N Y D 0 9 1 2 1 4 7 1 8 T/A: 3 C: 1		S: W DUP T/A: 3 C: 2 DUP	

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	P 1 0 6	1200 000 ~~(0.8% active)~~	P	S 0 1	
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

F6: A/55 F6: A/56

JUL 6 12 25 PM '81
ENVIRONMENTAL PROTECTION AGENCY
NEW YORK, N.Y. 10007

EPA I.D. NO. (enter from page 1)														
S	N	Y	D	0	9	1	2	1	4	7	1	8	T/A 3	C 6

V. FACILITY DRAWING

All **existing** facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).*

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground—level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).*

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)			LONGITUDE (degrees, minutes, & seconds)		
40	45	000	073	45	000

VIII. FACILITY OWNER

[X] A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. (area code & no.)
E AMERICAN BANK NOTE COMPANY	212-542-9200

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F 70 BROAD STREET	G NEW YORK	NY	10004

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
Robert F. Ivey	[signature]	7/2/81

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
Robert F. Ivey	[signature]	7/2/81

 CONTINUE ON PAGE 5

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175

FORM 1 GENERAL

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program
(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

F D

LABEL ITEMS

I. EPA I.D. NUMBER

III. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

NYD091214718

AMERICAN BANKNOTE CO
GARRISON & TIFFANY ST
BRONX, N.Y. 10474

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill—in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill—in area*(s)* below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of **bold—faced terms.**

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge** to **waters of the U.S.**? (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge** to **waters of the U.S.**? (FORM 2B)		X	
C. Is this a facility which currently results in **discharges** to **waters of the U.S.** other than those described in A or B above? (FORM 2C)		X	
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge** to **waters of the U.S.**? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X		
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	
J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP AMERICAN BANK NOTE COMPANY BRONX PLANT

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*
2 LACAPRIA ANTHONY VP RES & DEV	212 542 9200

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

3 TIFFANY ST & GARRISON AVE

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 BRONX	NY	10474

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

5 TIFFANY ST & GARRISON AVE

B. COUNTY NAME

BRONX

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE *(if known)*
6 NEW YORK	NY	10474	

JUN 7 ENVIRONMENTAL NEW Y

AIR '83 PROTECTION CY N.Y. 10007

CONTINUE ON REVERSE

CONTINUED FROM THE FRONT

VII. SIC CODES *(4-digit, in order of priority)*

A. FIRST	B. SECOND
C 7 *(specify)*	C 7 *(specify)*
C. THIRD	**D. FOURTH**
C 7 *(specify)*	C 7 *(specify)*

VIII. OPERATOR INFORMATION

A. NAME: C 8

B. Is the name listed in Item VIII-A also the owner? [X] YES [ ] NO (66)

C. STATUS OF OPERATOR *(Enter the appropriate letter into the answer box; if "Other", specify.)*

F = FEDERAL
S = STATE
P = PRIVATE
M = PUBLIC *(other than federal or state)*
O = OTHER *(specify)*

P (56) *(specify)*

D. PHONE *(area code & no.)*: C A (15) 212 (16-18) 542 (19-21) 9200 (22-25)

E. STREET OR P.O. BOX

F. CITY OR TOWN: C B

G. STATE

H. ZIP CODE

IX. INDIAN LAND

Is the facility located on Indian lands? [ ] YES [ ] NO (52)

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES *(Discharges to Surface Water)*: C 9 T N I	D. PSD *(Air Emissions from Proposed Sources)*: C 9 T P I
B. UIC *(Underground Injection of Fluids)*: C 9 T U I	E. OTHER *(specify)*: C 9 T I *(specify)*
C. RCRA *(Hazardous Wastes)*: C 9 T R I	E. OTHER *(specify)*: C 9 T I *(specify)*

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS *(provide a brief description)*

ABNCo. is a security printer, printing foreign currency, traveler's checks, securities and other forms of monetary instruments.

XIII. CERTIFICATION *(see instructions)*

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE *(type or print)*	B. SIGNATURE	C. DATE SIGNED

COMMENTS FOR OFFICIAL USE ONLY

C: C

Please print or type in the unshaded areas only
(fill-in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

FORM 3 RCRA

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

S													T/A	C
F	N	Y	D	0	9	1	2	1	4	7	1	8		1

1 2 - 13 14 15

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS
23	24 - 29	

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

☐ 71 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

C 8 15 — YR. 73 74 — MO. 75 76 — DAY 77 78 — FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

☐ 71 2. NEW FACILITY *(Complete item below.)*

YR. 73 74 — MO. 75 76 — DAY 77 78 — FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

☒ 72 1. FACILITY HAS INTERIM STATUS

☐ 72 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES — CODES AND DESIGN CAPACITIES

A. PROCESS CODE — Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code*(s)* in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY — For each code entered in column A enter the capacity of the process.
1. AMOUNT — Enter the amount.
2. UNIT OF MEASURE — For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below):* A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S													T/A	C
C	D	U	P											1

1 2 - 13 14 15

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
	16 - 18	19 - 27	28	29 - 32		16 - 18	19 - 27	28	29 - 32
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1					7				
2	T 0 1	250	U		8				
3		(Intermittent operation;			9				
4		approx. 25 days/year)			10				

CONTINUE ON REVERSE

Continued from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. **EPA HAZARDOUS WASTE NUMBER** — Enter the four—digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four—digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. **ESTIMATED ANNUAL QUANTITY** — For each **listed waste** entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non—listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. **UNIT OF MEASURE** — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. **PROCESSES**

1. PROCESS CODES:
   For listed hazardous waste: For each **listed** hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non—listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate **all** the processes that will be used to store, treat, and/or dispose of all the non—listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non—listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K054	900	P	T03 D80	
X-2	D002	400	P	T03 D80	
X-3	D001	100	P	T03 D80	
X-4	D002				included with above

CONTINUE ON PAGE 3

Continued from page 2.

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)	FOR OFFICIAL USE ONLY
S W N Y D 0 9 1 2 1 4 7 1 8 T/A C 1	S W DUP T/A C 2 DUP

IV. DESCRIPTION OF HAZARDOUS WASTES *(continued)*

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1					
2	P106	1200	P	S01 T01	Cyanide Destruction
3		(Approximately			
4		8% NaCN)			
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

EPA Form 3510-3 (6-80)

CONTINUE ON REVERSE

(enter "A", "B", "C", etc. behind the "3" to identify photocopied pages)

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTES *(continued)*

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. *(enter from page 1)*

S													T/A	C
F	N	Y	D	0	9	1	2	1	4	7	1	8		6

1 2 - 13 14 15

V. FACILITY DRAWING

All **existing** facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).*

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground—level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).*

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE *(degrees, minutes, & seconds)*	LONGITUDE *(degrees, minutes, & seconds)*
40 45 (65 66 67 68 69 - 71)	73 45 (72 - 74 75 76 77 - 79)

VIII. FACILITY OWNER

[X] A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. *(area code & no.)*
C E (15 16 - 55)	(56 - 58) - (59 - 61) - (62 - 65)

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
C F (15 16 - 45)	C G (15 16 - 40)	(41 42)	(47 - 51)

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
A. LaCapria	Anthony LaCapria	May 31, 1983

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

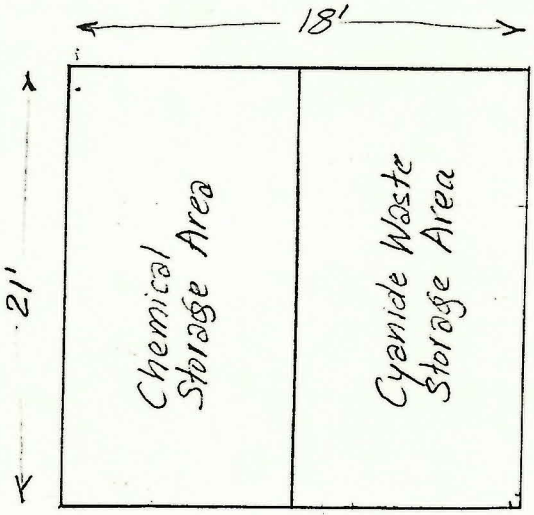
A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
A. LaCapria	Anthony LaCapria	May 31, 1983

 CONTINUE ON PAGE 5

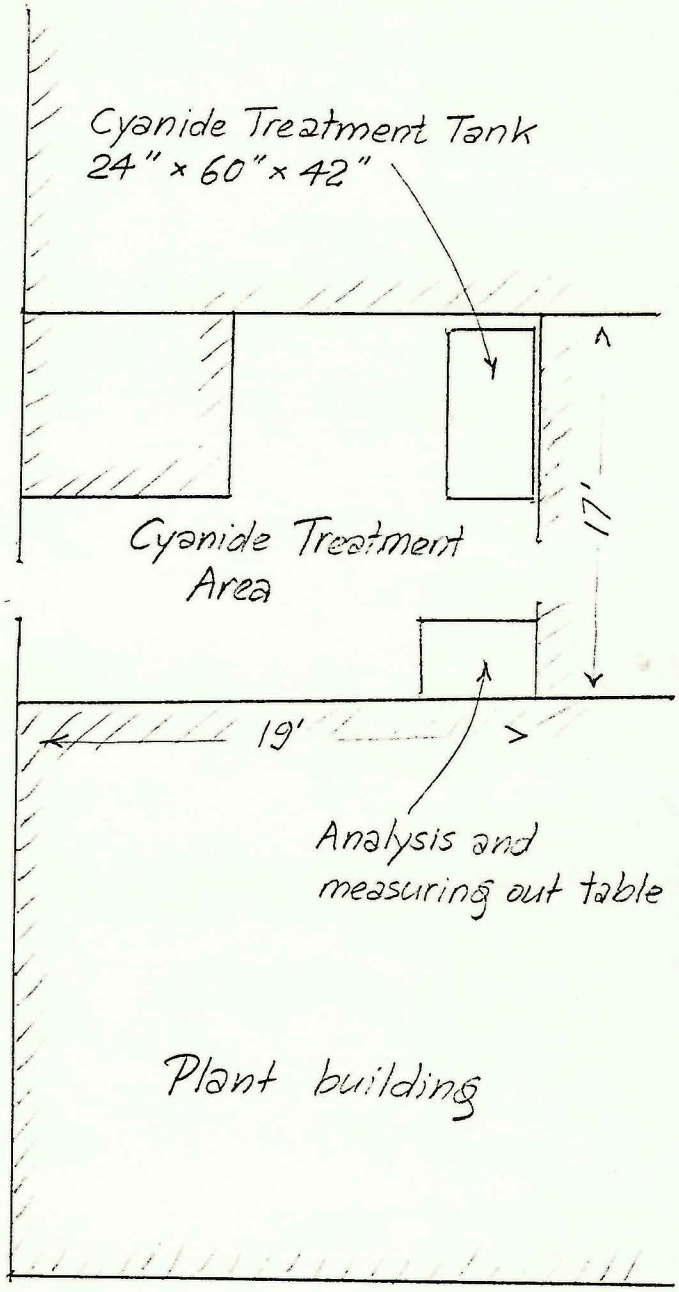
Continued from page 4.

Form Approved OMB No. 158-S80004

V. FACILITY DRAWING (see page 4)



Storage building



Interior court of the ABNCo buildings complex (walled-in and gated) at Tiffany and Garrison, Bronx, NY.

APPROX. SCALE: 1.5 INCH = 10 FEET

AMERICAN BANK NOTE COMPANY
70 BROAD STREET, NEW YORK, N.Y. 10004
ADDRESS CORRECTION REQUESTED

Permit Contact
Permits Administration Branch
Room 432
U. S. Environmental Protection Agency
26 Federal Plaza
New York, New York 10007

FIRST CLASS MAIL

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER → NYD091210710

AMERICAN BANK NOTE COMPANY BRONX PLANT
TIFFANY ST & GARRISON AVE
BRONX NEW YORK NY 10474

INSTALLATION ADDRESS → GARRISON & TIFFANY ST
BRONX, NY 10474

EPA Form 8700-12B (4-80) 12/08/80

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175

FORM 1 GENERAL

EPA

ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program
(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

S		T/A	C
F			D
1	2 - 13	14	15

LABEL ITEMS

I. EPA I.D. NUMBER
III. FACILITY NAME
V. FACILITY MAILING ADDRESS
VI. FACILITY LOCATION

NYD091214718

AMERICAN BANKNOTE CO
GARRISON & TIFFANY ST
BRONX, N.Y. 10474

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill—in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill—in area*(s)* below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of **bold—faced terms.**

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED	SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge** to **waters of the U.S.**? (FORM 2A)		X		B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge** to **waters of the U.S.**? (FORM 2B)		X	
	16	17	18		19	20	21
C. Is this a facility which currently results in **discharges** to **waters of the U.S.** other than those described in A or B above? (FORM 2C)		X		D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge** to **waters of the U.S.**? (FORM 2D)		X	
	22	23	24		25	26	27
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X			F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
	28	29	30		31	32	33
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
	34	35	36		37	38	39
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X		J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	
	40	41	42		43	44	45

III. NAME OF FACILITY

C 1 SKIP AMERICAN BANK NOTE COMPANY BRONX PLANT (15 – 16 - 29 – 30 – 69)

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*		
C 2 LACAPRIA ANTHONY VP RES & DEV (15 – 16 – 45)	212 (46 – 48)	542 (49 – 51)	9200 (52 – 55)

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

C 3 TIFFANY ST & GARRISON AVE (15 – 16 – 45)

B. CITY OR TOWN	C. STATE	D. ZIP CODE
C 4 BRONX (15 – 16 – 40)	NY (41 – 42)	10474 (47 – 51)

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

C 5 TIFFANY ST & GARRISON AVE (15 – 16 – 45)

B. COUNTY NAME

BRONX (46 – 70)

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE *(if known)*
C 6 NEW YORK (15 – 16 – 40)	NY (41 – 42)	10474 (47 – 51)	(52 – 54)

CONTINUED FROM THE FRONT

VII. SIC CODES *(4-digit, in order of priority)*

A. FIRST	B. SECOND
C 7 *(specify)*	C 7 *(specify)*
C. THIRD	**D. FOURTH**
C 7 *(specify)*	C 7 *(specify)*

VIII. OPERATOR INFORMATION

A. NAME

C 8

B. Is the name listed in Item VIII-A also the owner? [X] YES [ ] NO (66)

C. STATUS OF OPERATOR *(Enter the appropriate letter into the answer box; if "Other", specify.)*

F = FEDERAL
S = STATE
P = PRIVATE
M = PUBLIC *(other than federal or state)*
O = OTHER *(specify)*

P (56) *(specify)*

D. PHONE *(area code & no.)*

C A (15) 2.1.2 (16 - 18) 5.4.2 (19 - 21) 9.2.0.0 (22 - 25)

E. STREET OR P.O. BOX

F. CITY OR TOWN

C B

G. STATE

H. ZIP CODE

IX. INDIAN LAND

Is the facility located on Indian lands?

[ ] YES [ ] NO (52)

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES *(Discharges to Surface Water)* C T I: 9 N	**D. PSD** *(Air Emissions from Proposed Sources)* C T I: 9 P
B. UIC *(Underground Injection of Fluids)* C T I: 9 U	**E. OTHER** *(specify)* C T I: 9 *(specify)*
C. RCRA *(Hazardous Wastes)* C T I: 9 R	**E. OTHER** *(specify)* C T I: 9 *(specify)*

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS *(provide a brief description)*

ABNCo. is a security printer, printing foreign currency, traveler's checks, securities and other forms of monetary instruments.

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I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE *(type or print)*	B. SIGNATURE	C. DATE SIGNED

COMMENTS FOR OFFICIAL USE ONLY

C C

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

FORM 3 RCRA

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

S													T/A	C
F	N	Y	D	0	9	1	2	1	4	7	1	8		1

1 2 - 13 14 15

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS
23	24 - 29	

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

☐ 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)* 71

C 8 15 — FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

YR.	MO.	DAY
73 74	75 76	77 78

☐ 2. NEW FACILITY *(Complete item below.)* 71

FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY
73 74	75 76	77 78

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

☒ 1. FACILITY HAS INTERIM STATUS 72

☐ 2. FACILITY HAS A RCRA PERMIT 72

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code*(s)* in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY – For each code entered in column A enter the capacity of the process.
1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below):* A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S														T/A	C
C	D	U	P												1

1 2 - 13 14 15

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
	16 - 18	19 - 27	28	29 - 32		16 - 18	19 - 27	28	29 - 32
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1					7				
2	T 0 1	250	U		8				
3		(Intermittent operation;			9				
4		approx. 25 days/year)			10				
	16 - 18	19 - 27	28	29 - 32		16 - 18	19 - 27	28	29 - 32

CONTINUE ON REVERSE

Continued from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY – For each **listed waste** entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:
   For listed hazardous waste: For each **listed** hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate **all** the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. *(enter code)*	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE *(enter code)*	D. PROCESSES 1. PROCESS CODES *(enter)*	D. PROCESSES 2. PROCESS DESCRIPTION *(if a code is not entered in D(1))*
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				*included with above*

CONTINUE ON PAGE 3

Continued from page 2.
NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)	FOR OFFICIAL USE ONLY
S W N Y D 0 9 1 2 1 4 7 1 8 T/A C 1	S W DUP T/A C 2 DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1					
2	P 1 0 6	1200	P	S 0 1 T 0 1	Cyanide Destruction
3		(Approximately			
4		8% NaCN)			
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

EPA Form 3510-3 (6-80)

CONTINUE ON REVERSE

(enter "A", "B", "C", etc. behind the "3" to identify photocopied pages)

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTES *(continued)*

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. *(enter from page 1)*

S												T/A	C
F	N	Y	D	0	9	1	2	1	4	7	1	8	6

V. FACILITY DRAWING

All **existing** facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).*

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground—level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).*

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE *(degrees, minutes, & seconds)*	LONGITUDE *(degrees, minutes, & seconds)*
40 45	73 45

VIII. FACILITY OWNER

[X] A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. *(area code & no.)*

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
A. LaCapria	Anthony LaCapria	May 31, 1983

X. OPERATOR CERTIFICATION

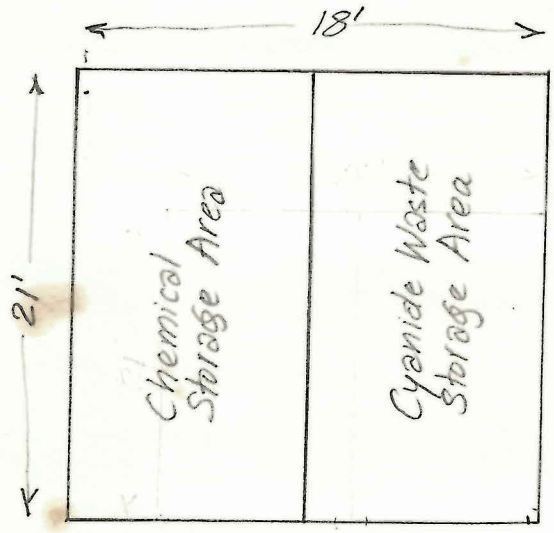
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
A. LaCapria	Anthony LaCapria	May 31, 1983

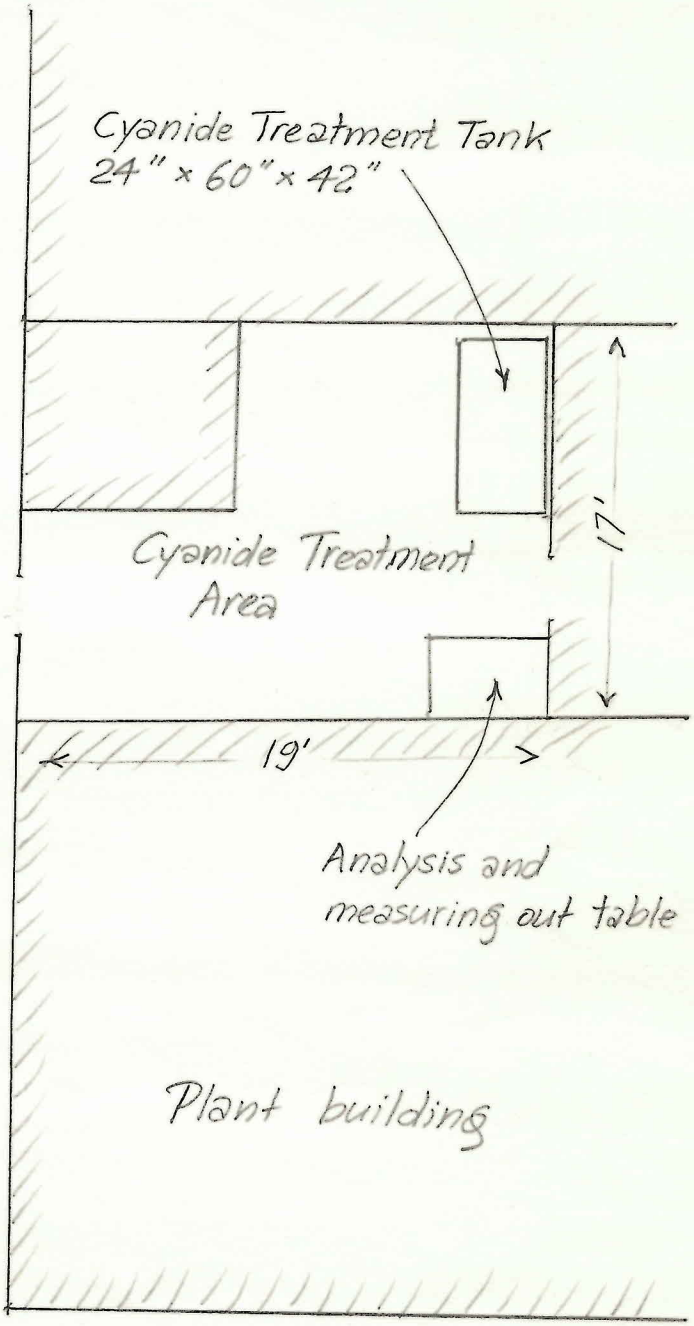
CONTINUE ON PAGE 5

Continued from page 4.

V. FACILITY DRAWING *(see page 4)*



Storage building



Interior court of the ABNCo buildings complex (walled-in and gated) at Tiffany and Garrison, Bronx, NY.

APPROX. SCALE: 1.5 INCH = 10 FEET


CYANOBR
CYANOBR

Please print or type with ELITE type (12 characters/inch) in the unshaded areas only.

Form Approved OMB No. 158-S79016
GSA No. 0246-EPA-OT

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.	NYD091214718
I. NAME OF INSTALLATION	~~AMERICAN BANKNOTE CO~~
II. INSTALLATION MAILING ADDRESS	GARRISON & TIFFANY ST BRONX, N.Y. 10474
III. LOCATION OF INSTALLATION	

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

DETACH

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER: F NYD091214718 3 1 — APPROVED: — DATE RECEIVED (yr., mo., & day): 801113

I. NAME OF INSTALLATION

American Bank Note Company BRONX PLANT

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3 Tiffany St. & Garrison Ave

CITY OR TOWN: 4 Bronx New York — ST.: NY — ZIP CODE: 10474

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 5 ~~SAME~~

CITY OR TOWN: 6 — ST. — ZIP CODE

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title): 2 LaCapria Anthony Research Dir — PHONE NO. (area code & no.): 212-542-9200

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 American Bank Note Company

B. TYPE OF OWNERSHIP (enter the appropriate letter into box)

F = FEDERAL
M = NON–FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

- [X] A. GENERATION
- [ ] B. TRANSPORTATION (complete item VII)
- [X] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only – enter "X" in the appropriate box(es))

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

FOR OFFICIAL USE ONLY

S														T/A	C
W	N	Y	D	0	9	1	2	1	4	7	1	8	2		1
1	2												13	14	15

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
K086	P106				
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

☐ 1. IGNITABLE (D001) ☐ 2. CORROSIVE (D002) ☐ 3. REACTIVE (D003) ☐ 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
S.F. D'Amato	S.F. D'Amato, President	11/12/80

ap

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II

In the Matter of AMERICAN BANK NOTE CO. BRONX PLANT NYD091214718 Bronx, New York 10474 Respondent. Proceeding Under Section 3008 of the Solid Waste Disposal Act, as amended.	COMPLAINT, COMPLIANCE ORDER, AND NOTICE OF OPPORTUNITY FOR HEARING Docket No. II RCRA-83-0234

COMPLAINT

This administrative proceeding is instituted pursuant to Section 3008 of the Solid Waste Disposal Act, as amended, 42 U.S.C. §6901 et seq. ("the Act"). [Note: Among the statutes amending the Act is the Resource Conservation and Recovery Act, 90 Stat. 2795, P.L. 94-580 (1976).]

The Director of Air and Waste Management Division of the U.S. Environmental Protection Agency (EPA), Region II, Complainant in this proceeding, has determined that Respondent, AMERICAN BANK NOTE CO. BRONX PLANT has violated Section 3004 of the Act, 42 U.S.C. §6924, and the regulations promulgated thereunder, as hereinafter specified:

1. Respondent owns and operates a facility located at:

Tiffany St. and Garrison Ave.
Bronx, New York 10474

2. By notification dated November 12, 1980, Respondent informed EPA that it conducts activities at the facility involving "hazardous waste," as that term is defined in Section 1004(5) of the Act, 42 U.S.C. §6903(5) and in 40 CFR §261.3. By application dated July 2, 1981, Respondent requested a permit to conduct its hazardous waste activities.

3. EPA regulations for hazardous waste treatment, storage, and disposal facilities are found at 40 CFR Part 265 (published in 45 Fed. Reg. 33063 et seq., May 19, 1980 and as later amended), promulgated pursuant to Subtitle C of the Act, 42 U.S.C. §6921 et seq.

4. 40 CFR Part 265 sets interim status standards for hazardous waste

treatment, storage, and disposal facilities. These standards apply until final administrative disposition of permit applications with respect to these facilities has been made. No such final disposition has been made with respect to your facility, and thus the standards of Part 265 apply thereto.

5. 40 CFR §265.143 (amended on April 7, 1982) requires that by the effective date of the regulation (July 6, 1982), an owner or operator of a hazardous waste facility must establish financial assurance for closure of the facility, as well as, where appropriate, post-closure monitoring. As of August 12, 1983, information available to EPA indicates that Respondent's facility had not submitted the documents necessary to comply with this requirement. Respondent was therefore in violation of 40 CFR §265.143.

6. 40 CFR §265.147 (amended on April 17, 1982) requires that by the effective date of the regulation (July 17, 1982) an owner or operator of a hazardous waste facility must establish financial responsibility for bodily injury and property damage to third parties caused by sudden accidental occurrences arising from the operation of the facility. As of August 12, 1983, information available to EPA indicates that Respondent's facility had not submitted the documents necessary to comply with this requirement. Respondent was therefore in violation of 40 CFR §265.147.

PROPOSED CIVIL PENALTY

In view of the above-cited violations, and pursuant to the authority of Section 3008 of the Act, Complainant herewith proposes the assessment of a civil penalty in the amount of $15,000.00 against AMERICAN BANK NOTE CO. BRONX PLANT for the violations specified hereinabove as follows:

-for the violation of 40 CFR §265.143:	$ 7,500.00
-for the violation of 40 CFR §265.147:	$ 7,500.00
Total:	$ 15,000.00

COMPLIANCE ORDER

Based upon the foregoing, and pursuant to the authority of Section 3008 of the Act, Complainant herewith issues the following Compliance Order against Respondent herein:

1. Respondent shall, within thirty (30) days of the effective date of this Compliance Order, submit to EPA documents sufficient to establish financial assurance for closure and, where appropriate, post-closure monitoring, as required by 40 CFR §265.143.

2. Respondent shall, within thirty (30) days of the effective date of this Compliance Order, submit to EPA documents sufficient to establish financial responsibility for bodily injury and property damage to third parties caused by sudden accidental occurrences arising from the operation of the facility, as required by 40 CFR §265.147.

NOTICE OF LIABILITY FOR ADDITIONAL CIVIL PENALTIES

Pursuant to the terms of Section 3008(a)(3) of the Act, a violator failing to take corrective action within the time specified in a Final Compliance Order is liable for a civil penalty of up to $25,000 for each day of continued noncompliance. Such continued noncompliance may also result in suspension or revocation of any permits issued to the violator pursuant to the authority of the Act.

NOTICE OF OPPORTUNITY TO REQUEST A HEARING

As provided in Section 3008(b) of the Act, and in accordance with EPA's Consolidated Rules of Practices Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22, 45 Fed. Reg. 24360 (April 9, 1980) (a copy of which accompanies this Complaint, Compliance Order, and Notice of Opportunity for Hearing), you have the right to request a hearing to contest any material fact set out in the Complaint, or to contest the appropriateness of the proposed penalty, or the terms of the Compliance Order. (Consistent with the provisions of Section 3008(b) of the Act, the hearing provided will be noticed and open to the general public, should you specifically request such a public hearing. In the absence of such a specific request, however, public notice of a scheduled hearing will not be published.)

To avoid being found in default, and having the proposed civil penalty assessed and the Compliance Order confirmed without further proceedings, you must file a written answer to the Complaint, which may include a request for a hearing. Your answer (if any) must be addressed to the Regional Hearing Clerk, U.S. Environmental Protection Agency, Region II, 26 Federal Plaza, New York, New York, 10278, and must be filed within thirty (30) days of your receipt of this Complaint, Compliance Order, and Notice of Opportunity for Hearing. Your answer must clearly and directly admit, deny or explain each of the factual allegations contained in the Complaint, and should contain (1) a clear statement of the facts which constitute the grounds of your defense, and (2) a concise statement of the contentions which you intend to place in issue at the hearing.

The denial of any material fact, or the raising of any affirmative defense, will be construed as a request for a hearing. Failure to deny any of the factual allegations in the Complaint will be deemed to constitute an admission of the undenied allegations. Your failure to file a written answer within thirty (30) days of receipt of this instrument will be deemed to represent your admission of all facts alleged in the Complaint, and a waiver of your right to a formal hearing to contest any of the facts alleged by the Complainant. Your default will result in the final issuance of the Compliance Order, and assessment of the proposed civil penalty, without further proceedings.

INFORMAL SETTLEMENT CONFERENCE

Whether or not you request a hearing, the EPA encourages settlement of this proceeding consistent with the provisions of the Act. At an informal conference with a representative of the Complainant you may comment on the charges and provide whatever additional information you feel is relevant to the disposition of this matter, including any actions you have taken to correct the violation, and any other special circumstances you care to raise. The Complainant has the authority to modify the amount of the proposed penalty, where appropriate, to reflect any settlement agreement reached with you in such conference, or to recommend that any or all of the charges be dismissed, if the circumstances so warrant. Your request for an informal conference and other questions that you may have regarding this Complaint, Compliance Order, and Notice of Opportunity for Hearing should be directed to:

James Cleary, (212)264-8929

Please note that a request for an informal settlement conference does not extend the thirty (30) day period during which a written answer and request for a hearing must be submitted. The informal conference procedure may be pursued as an alternative to or simultaneously with the adjudicatory hearing procedure. However, no penalty reduction will be made simply because such a conference is held. Any settlement which may be reached as a result of such conference will be embodied in a written Consent Agreement and Final Compliance Order to be issued by the Regional Administrator of EPA, Region II, and signed by you or your representative. Your signing of such Consent Agreement would constitute a waiver of your right to request a hearing on any matter stipulated to therein.

RESOLUTION OF THIS PROCEEDING WITHOUT HEARING OR CONFERENCE

Instead of filing an answer requesting a hearing or requesting an informal settlement conference, you may choose to sign the attached Consent Agreement and Consent Order, and to comply with the terms and pay the proposed penalty set out therein. The Consent Agreement and penalty constitutes a proposed final settlement of the action instituted by this Complaint. The settlement proposal is contingent upon acceptance by Respondent within a thirty (30) day period after Respondent's receipt of this Complaint. A request for an informal settlement conference, a filing of an Answer, or a request for a Hearing will all constitute a rejection of the proposal. The penalty offer is calculated at a rate of one hundred dollars ($100.00) per month per violation, and represents the minimum settlement which Complainant will accept taking into account the nature of the violation and the good faith efforts of Respondent to settle the manner expeditiously. NOTE: For violations which continue beyond the thirty (30) day period, EPA will offer to settle for no less than five hundred dollars ($500.00) per each additional month per violation. Failure to accept this settlement proposal will constitute a rejection. In the event that the proposal is rejected for any reason, EPA will continue to pursue the action initiated by this Complaint in full

conformance with established Agency policy of settling penalties at no less than sixty percent (60%) of the original assessment.

DATED: New York, New York
September 8, 1983

COMPLAINANT:

CONRAD SIMON
Director
Air and Waste Management Division
Environmental Protection Agency
Region II

TO: Robert I. Ivey, Vice President and Secretary
Tiffany St. and Garrison Ave.
Bronx, New York 10474

cc: Laurens Vernon
Compliance Counsel
New York State Department of Environmental Conservation

cc: David Mafrici
Bureau of Hazardous Waste Operations
New York State Department of Environmental Conservation

CERTIFICATE OF SERVICE

This is to certify that on the 12th day of SEPTEMBER, 1983 I served a true and correct copy of the foregoing Complaint by certified mail to Robert I. Ivey, Tiffany St. and Garrison Ave., Bronx, New York 10474. I handcarried the original foregoing Complaint to the Regional Hearing Clerk.

Marjorie Tassy
Clerk Typist

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II

In the Matter of AMERICAN BANK NOTE CO. BRONX PLANT NYD091214718 Bronx, New York 10474 E8405 30 2000 SWN Respondent. Proceeding Under Section 3008 of the Solid Waste Disposal Act, as amended.	CONSENT AGREEMENT AND CONSENT ORDER Docket No. II RCRA-83-0234

PRELIMINARY STATEMENT

This administrative proceeding was instituted pursuant to Section 3008 of the Solid Waste Disposal Act, as amended, 42 U.S.C. §6901 et seq. (the Act). [Note: Among the statutes amending the Act is the Resource Conservation and Recovery Act, 90 Stat. 2795, P.L. 94-580 (1976).]

The Director of the Air and Waste Management Division of the U.S. Environmental Protection Agency (EPA), Region II, Complainant in this proceeding, issued a Complaint, Compliance Order, and Notice of Opportunity for Hearing to Respondent, AMERICAN BANK NOTE CO. BRONX PLANT. Said document charged Respondent with certain violations of Section 3004 of the Act, 42 U.S.C. §6924, and the regulations promulgated thereunder, as follows:

1. Respondent owns and operates a facility located at:

Tiffany St. and Garrison Ave.

Bronx, New York 10474

2. By notification dated November 12, 1980, Respondent informed EPA that it conducts activities at the facility involving "hazardous waste," as that term is defined in Section 1004(5) of the Act, 42 U.S.C. §6903(5) and in 40 CFR §261.3.

By application dated July 2, 1981, Respondent requested a permit to conduct its hazardous waste activities.

3. EPA regulations for hazardous waste treatment, storage, and disposal facilities are found at 40 CFR Part 265 (published in 45 Fed. Reg. 33063 et seq., May 19, 1980 and as later amended), promulgated pursuant to Subtitle C of the Act, 42 U.S.C. §6921 et seq.

4. 40 CFR Part 265 sets interim status standards for hazardous waste treatment, storage, and disposal facilities. These standards apply until final administrative disposition of permit applications with respect to these facilities has been made. No such final disposition has been made with respect to your facility, and thus the standards of Part 265 apply thereto.

5. 40 CFR §265.143 (amended on April 7, 1982) requires that by the effective date of the regulation, (July 6, 1982) an owner or operator of a hazardous waste facility must establish financial assurance for closure of the facility, as well as, where appropriate, post-closure monitoring. As of August 12, 1983, information available to EPA indicates that Respondent's facility had not submitted the documents necessary to comply with this requirement. Respondent was therefore in violation of 40 CFR §265.143.

6. 40 CFR §265.147 (amended on April 17, 1982) requires that by the effective date of the regulation (July 17, 1982) an owner or operator of a hazardous waste facility must establish financial responsibility for bodily injury and property damage to third parties caused by sudden accidental occurrences arising from the operation of the facility. As of August 12, 1983, information available to EPA indicates that Respondent's facility had not submitted the documents necessary to comply with this requirement. Respondent was therefore in violation of 40 CFR §265.147.

CONSENT AGREEMENT

Based upon the foregoing, and pursuant to Section 3008 of the Act, and Section 22.18 of the Consolidated Rules of Practices Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR §22.18, it is hereby agreed that Respondent shall hereinafter comply with all relevant regulations at 40 CFR Parts 261 through 265 and the following terms:

1. Respondent shall, within thirty (30) days of the effective date of this Compliance Order, submit to EPA documents sufficient to establish financial assurance for closure and, where appropriate, post-closure monitoring, as required by 40 CFR §265.143.

2. Respondent shall, within thirty (30) days of the effective date of this Compliance Order, submit to EPA documents sufficient to establish financial responsibility for bodily injury and property damage to third parties caused by sudden accidental occurences arising from the operation of the facility, as required by 40 CFR §265.147.

Within sixty (60) days of receipt of a signed and executed copy of this Consent Agreement and Final Order, Respondent shall pay by cashier's or certified check a civil penalty for the violations cited herein in the amount of $2,000.00, payable to the Treasurer, United States of America. Such payment shall be remitted to the Regional Hearing Clerk, EPA, Region II, 26 Federal Plaza, New York, New York, 10278. Failure to remit such payment in full will result in the referral of this matter to the United States Attorney for collection. This Consent Agreement is being entered into by the parties in full settlement of all liabilities which might have attached as a result of the proceedings.

Respondent admits the jurisdictional allegations of the Complaint. Furthermore, Respondent has read the Agreement and admits the facts stipulated therein. Respondent consents to the assessment of the civil penalty set forth in the Agreement and explicitly waives its right to request a hearing on the Complaint, this Agreement, or the attached Consent Order.

RESPONDENT:

BY: _____
Vice President & Secretary

DATE: October 11, 1983

COMPLAINANT:

_____
CONRAD SIMON
Director
Air and Waste Management Division

DATE: October 25, 1983

CONSENT ORDER

The Regional Administrator of EPA, Region II, concurs in the foregoing Consent Agreement. The Agreement entered into by the parties is hereby approved and issued, effective immediately.

_____
JACQUELINE E. SCHAFER
Regional Administrator
U.S. Environmental Protection Agency
26 Federal Plaza
New York, New York 10278

DATE: 10/25/83

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II

In the Matter of AMERICAN BANK NOTE CO. BRONX PLANT NYD091214718 Bronx, New York 10474	COMPLAINT, COMPLIANCE ORDER, AND NOTICE OF OPPORTUNITY FOR HEARING
Respondent.	Docket No. II RCRA-83-0234
Proceeding Under Section 3008 of the Solid Waste Disposal Act, as amended.	

COMPLAINT

This administrative proceeding is instituted pursuant to Section 3008 of the Solid Waste Disposal Act, as amended, 42 U.S.C. §6901 et seq. ("the Act"). [Note: Among the statutes amending the Act is the Resource Conservation and Recovery Act, 90 Stat. 2795, P.L. 94-580 (1976).]

The Director of Air and Waste Management Division of the U.S. Environmental Protection Agency (EPA), Region II, Complainant in this proceeding, has determined that Respondent, AMERICAN BANK NOTE CO. BRONX PLANT has violated Section 3004 of the Act, 42 U.S.C. §6924, and the regulations promulgated thereunder, as hereinafter specified:

1. Respondent owns and operates a facility located at:

Tiffany St. and Garrison Ave.
Bronx, New York 10474

2. By notification dated November 12, 1980, Respondent informed EPA that it conducts activities at the facility involving "hazardous waste," as that term is defined in Section 1004(5) of the Act, 42 U.S.C. §6903(5) and in 40 CFR §261.3. By application dated July 2, 1981, Respondent requested a permit to conduct its hazardous waste activities.

3. EPA regulations for hazardous waste treatment, storage, and disposal facilities are found at 40 CFR Part 265 (published in 45 Fed. Reg. 33063 et seq., May 19, 1980 and as later amended), promulgated pursuant to Subtitle C of the Act, 42 U.S.C. §6921 et seq.

4. 40 CFR Part 265 sets interim status standards for hazardous waste

treatment, storage, and disposal facilities. These standards apply until final administrative disposition of permit applications with respect to these facilities has been made. No such final disposition has been made with respect to your facility, and thus the standards of Part 265 apply thereto.

5. 40 CFR §265.143 (amended on April 7, 1982) requires that by the effective date of the regulation (July 6, 1982), an owner or operator of a hazardous waste facility must establish financial assurance for closure of the facility, as well as, where appropriate, post-closure monitoring. As of August 12, 1983, information available to EPA indicates that Respondent's facility had not submitted the documents necessary to comply with this requirement. Respondent was therefore in violation of 40 CFR §265.143.

6. 40 CFR §265.147 (amended on April 17, 1982) requires that by the effective date of the regulation (July 17, 1982) an owner or operator of a hazardous waste facility must establish financial responsibility for bodily injury and property damage to third parties caused by sudden accidental occurrences arising from the operation of the facility. As of August 12, 1983, information available to EPA indicates that Respondent's facility had not submitted the documents necessary to comply with this requirement. Respondent was therefore in violation of 40 CFR §265.147.

PROPOSED CIVIL PENALTY

In view of the above-cited violations, and pursuant to the authority of Section 3008 of the Act, Complainant herewith proposes the assessment of a civil penalty in the amount of $15,000.00 against AMERICAN BANK NOTE CO. BRONX PLANT for the violations specified hereinabove as follows:

-for the violation of 40 CFR §265.143:	$ 7,500.00
-for the violation of 40 CFR §265.147:	$ 7,500.00
Total:	$ 15,000.00

COMPLIANCE ORDER

Based upon the foregoing, and pursuant to the authority of Section 3008 of the Act, Complainant herewith issues the following Compliance Order against Respondent herein:

1. Respondent shall, within thirty (30) days of the effective date of this Compliance Order, submit to EPA documents sufficient to establish financial assurance for closure and, where appropriate, post-closure monitoring, as required by 40 CFR §265.143.

2. Respondent shall, within thirty (30) days of the effective date of this Compliance Order, submit to EPA documents sufficient to establish financial responsibility for bodily injury and property damage to third parties caused by sudden accidental occurrences arising from the operation of the facility, as required by 40 CFR §265.147.

NOTICE OF LIABILITY FOR ADDITIONAL CIVIL PENALTIES

Pursuant to the terms of Section 3008(a)(3) of the Act, a violator failing to take corrective action within the time specified in a Final Compliance Order is liable for a civil penalty of up to $25,000 for each day of continued noncompliance. Such continued noncompliance may also result in suspension or revocation of any permits issued to the violator pursuant to the authority of the Act.

NOTICE OF OPPORTUNITY TO REQUEST A HEARING

As provided in Section 3008(b) of the Act, and in accordance with EPA's Consolidated Rules of Practices Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22, 45 Fed. Reg. 24360 (April 9, 1980) (a copy of which accompanies this Complaint, Compliance Order, and Notice of Opportunity for Hearing), you have the right to request a hearing to contest any material fact set out in the Complaint, or to contest the appropriateness of the proposed penalty, or the terms of the Compliance Order. (Consistent with the provisions of Section 3008(b) of the Act, the hearing provided will be noticed and open to the general public, should you specifically request such a public hearing. In the absence of such a specific request, however, public notice of a scheduled hearing will not be published.)

To avoid being found in default, and having the proposed civil penalty assessed and the Compliance Order confirmed without further proceedings, you must file a written answer to the Complaint, which may include a request for a hearing. Your answer (if any) must be addressed to the Regional Hearing Clerk, U.S. Environmental Protection Agency, Region II, 26 Federal Plaza, New York, New York, 10278, and must be filed within thirty (30) days of your receipt of this Complaint, Compliance Order, and Notice of Opportunity for Hearing. Your answer must clearly and directly admit, deny or explain each of the factual allegations contained in the Complaint, and should contain (1) a clear statement of the facts which constitute the grounds of your defense, and (2) a concise statement of the contentions which you intend to place in issue at the hearing.

The denial of any material fact, or the raising of any affirmative defense, will be construed as a request for a hearing. Failure to deny any of the factual allegations in the Complaint will be deemed to constitute an admission of the undenied allegations. Your failure to file a written answer within thirty (30) days of receipt of this instrument will be deemed to represent your admission of all facts alleged in the Complaint, and a waiver of your right to a formal hearing to contest any of the facts alleged by the Complainant. Your default will result in the final issuance of the Compliance Order, and assessment of the proposed civil penalty, without further proceedings.

INFORMAL SETTLEMENT CONFERENCE

Whether or not you request a hearing, the EPA encourages settlement of this proceeding consistent with the provisions of the Act. At an informal conference with a representative of the Complainant you may comment on the charges and provide whatever additional information you feel is relevant to the disposition of this matter, including any actions you have taken to correct the violation, and any other special circumstances you care to raise. The Complainant has the authority to modify the amount of the proposed penalty, where appropriate, to reflect any settlement agreement reached with you in such conference, or to recommend that any or all of the charges be dismissed, if the circumstances so warrant. Your request for an informal conference and other questions that you may have regarding this Complaint, Compliance Order, and Notice of Opportunity for Hearing should be directed to:

James Cleary, (212)264-8929

Please note that a request for an informal settlement conference does not extend the thirty (30) day period during which a written answer and request for a hearing must be submitted. The informal conference procedure may be pursued as an alternative to or simultaneously with the adjudicatory hearing procedure. However, no penalty reduction will be made simply because such a conference is held. Any settlement which may be reached as a result of such conference will be embodied in a written Consent Agreement and Final Compliance Order to be issued by the Regional Administrator of EPA, Region II, and signed by you or your representative. Your signing of such Consent Agreement would constitute a waiver of your right to request a hearing on any matter stipulated to therein.

RESOLUTION OF THIS PROCEEDING WITHOUT HEARING OR CONFERENCE

Instead of filing an answer requesting a hearing or requesting an informal settlement conference, you may choose to sign the attached Consent Agreement and Consent Order, and to comply with the terms and pay the proposed penalty set out therein. The Consent Agreement and penalty constitutes a proposed final settlement of the action instituted by this Complaint. The settlement proposal is contingent upon acceptance by Respondent within a thirty (30) day period after Respondent's receipt of this Complaint. A request for an informal settlement conference, a filing of an Answer, or a request for a Hearing will all constitute a rejection of the proposal. The penalty offer is calculated at a rate of one hundred dollars ($100.00) per month per violation, and represents the minimum settlement which Complainant will accept taking into account the nature of the violation and the good faith efforts of Respondent to settle the manner expeditiously. NOTE: For violations which continue beyond the thirty (30) day period, EPA will offer to settle for no less than five hundred dollars ($500.00) per each additional month per violation. Failure to accept this settlement proposal will constitute a rejection. In the event that the proposal is rejected for any reason, EPA will continue to pursue the action initiated by this Complaint in full

conformance with established Agency policy of settling penalties at no less than sixty percent (60%) of the original assessment.

DATED: New York, New York
September 8, 1983

COMPLAINANT:

CONRAD SIMON
Director
Air and Waste Management Division
Environmental Protection Agency
Region II

TO: Robert I. Ivey, Vice President and Secretary
Tiffany St. and Garrison Ave.
Bronx, New York 10474

cc: Laurens Vernon
Compliance Counsel
New York State Department of Environmental Conservation

cc: David Mafrici
Bureau of Hazardous Waste Operations
New York State Department of Environmental Conservation

CERTIFICATE OF SERVICE

This is to certify that on the 12th day of SEPTEMBER, 1983 I served a true and correct copy of the foregoing Complaint by certified mail to Robert I. Ivey, Tiffany St. and Garrison Ave., Bronx, New York 10474. I handcarried the original foregoing Complaint to the Regional Hearing Clerk.

Marysel Tassy
Clerk Typist

Sept 20, 1983

Telecon w/ Richard Cohen, atty for American Bank. He admitted receiving Warning Letter in "early 83." Also referred to December '82 as compliance date, which could indicate he received W.L. Then as well.

Admitted that first submittal was March 1983, & that even they did not comply with the regulatory requirements.

I informed him that he could have a settlement conference, but that based on his representations, he would not get a better offer."

[signature]

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II

In the Matter of AMERICAN BANK NOTE CO. BRONX PLANT NYD091214718 Bronx, New York 10474 15000 SWN E0302 Respondent. Proceeding Under Section 3008 of the Solid Waste Disposal Act, as amended.	COMPLAINT, COMPLIANCE ORDER, AND NOTICE OF OPPORTUNITY FOR HEARING Docket No. II RCRA-83-0234

JH Amons 9/28/83

COMPLAINT

This administrative proceeding is instituted pursuant to Section 3008 of the Solid Waste Disposal Act, as amended, 42 U.S.C. §6901 et seq. ("the Act"). [Note: Among the statutes amending the Act is the Resource Conservation and Recovery Act, 90 Stat. 2795, P.L. 94-580 (1976).]

The Director of Air and Waste Management Division of the U.S. Environmental Protection Agency (EPA), Region II, Complainant in this proceeding, has determined that Respondent, AMERICAN BANK NOTE CO. BRONX PLANT has violated Section 3004 of the Act, 42 U.S.C. §6924, and the regulations promulgated thereunder, as hereinafter specified:

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Tiffany St. and Garrison Ave.
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Total:	$ 15,000.00

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James Cleary, (212)264-8929

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RESOLUTION OF THIS PROCEEDING WITHOUT HEARING OR CONFERENCE

Instead of filing an answer requesting a hearing or requesting an informal settlement conference, you may choose to sign the attached Consent Agreement and Consent Order, and to comply with the terms and pay the proposed penalty set out therein. The Consent Agreement and penalty constitutes a proposed final settlement of the action instituted by this Complaint. The settlement proposal is contingent upon acceptance by Respondent within a thirty (30) day period after Respondent's receipt of this Complaint. A request for an informal settlement conference, a filing of an Answer, or a request for a Hearing will all constitute a rejection of the proposal. The penalty offer is calculated at a rate of one hundred dollars ($100.00) per month per violation, and represents the minimum settlement which Complainant will accept taking into account the nature of the violation and the good faith efforts of Respondent to settle the manner expeditiously. NOTE: For violations which continue beyond the thirty (30) day period, EPA will offer to settle for no less than five hundred dollars ($500.00) per each additional month per violation. Failure to accept this settlement proposal will constitute a rejection. In the event that the proposal is rejected for any reason, EPA will continue to pursue the action initiated by this Complaint in full

conformance with established Agency policy of settling penalties at no less than sixty percent (60%) of the original assessment.

DATED: New York, New York
September 8, 1983

COMPLAINANT:

CONRAD SIMON
Director
Air and Waste Management Division
Environmental Protection Agency
Region II

TO: Robert I. Ivey, Vice President and Secretary
Tiffany St. and Garrison Ave.
Bronx, New York 10474

cc: Laurens Vernon
Compliance Counsel
New York State Department of Environmental Conservation

cc: David Mafrici
Bureau of Hazardous Waste Operations
New York State Department of Environmental Conservation

CERTIFICATE OF SERVICE

This is to certify that on the 12th day of SEPTEMBER, 1983 I served a true and correct copy of the foregoing Complaint by certified mail to Robert I. Ivey, Tiffany St. and Garrison Ave., Bronx, New York 10474. I handcarried the original foregoing Complaint to the Regional Hearing Clerk.

Marysol Tassy
Clerk Typist

Mr. Anthony LaCapria
Director of Research
American Bank Note Co.
Tiffany Street and Garrison Avenue
Bronx, New York 10474

Re: American Bank Note Co. NYD091214718

Dear Mr. LaCapria:

As a follow up to the hazardous waste inspection conducted at your company on July 8, 192 by Evan Liblit and myself I have enclosed a copy of the inspection report.

During the inspection, it was observed that numerous ink pails stacked in the driveway near Barretto Street were intended to be disposed in the local landfill. Many of those ink pails may contain high concentrations of lead from the lead based ink and therefore subject to regulation under the Resource Conservation and Recovery Act (RCRA). I recommend that unless these pails are empty as defined in 40 CFR 261.7 then they should be managed as a hazardous waste. In addition the waste generated from the ink making equipment (K086) should be managed as a hazardous waste and disposed by a facility approved by Environmental Protection Agency (not the local landfill).

Other deficiencies noted during the inspection include

1) containers were not labeled or dated (40 CFR 262.34)

2) no closure plan (40 CFR 265.112)

3) no inspection schedule (40 CFR 265.15)

4) no operating record (40 CFR 265.73)

A copy of this inspection report has been forwarded to our enforcement branch. Should you have any questions, do not hesitate to contact me at 264-1828.

Sincerely yours,

Janet DeBiasio
Environmental Scientist
New York Hazardous Waste Section
Solid Waste Branch

Enclosure

American Bank Note Company
Garrison Ave. & Tiffany St.
New York, N.Y. 10474

Check for type of action that required this

Janet
↓
PAB
cc Grants

March 25, 1983

NYD091214718

Mr. Conrad Simon
Director, Air and Waste Management Division
U.S. Enviromental Protection Agency
Region II
26 Federal Plaza
New York, New York 10278

Dear Mr. Simon:

101

As per your letter dated January 31, 1983 we are hereby submitting for your approval our closure plan for the Bronx Plant.

Sincerely,

E.J.Deadrick
Executive Vice President

JH
HUDAS
6/1/83

CLOSURE PLAN FOR AMERICAN BANK NOTE COMPANY

BRONX PLANT FACILITY

(HAZARDOUS WASTE)

EPA # NYD 091214718

In the event the American Bank Note Company ("ABN") Bronx Plant is closed, the following Closure Plan will be placed into operation for the disposal of Hazardous Waste.

Responsibility:

The Bronx Plant Management will be responsible for implementing the Closure Plan for the disposal of hazardous waste in the Bronx Plant, which consists of Sodium Cyanide and K086 waste.

Waste Destruction:

(A) Sodium Cyanide: All sodium cyanide waste on hand will be destroyed in ABN's cyanide destruction area. As of March 1, 1983, approximately 6174 pounds of sodium cyanide waste is on hand. By the end of March, 1983,ABN will commence destroying 250 pounds of sodium cyanide waste per week. Thus, it is anticipated that the entire inventory of such waste will be destroyed within 25 weeks. Since the Plant generates only about 600 pounds of sodium cyanide waste per year, management anticipates no difficulty maintaining complete control over the destruction of such waste.

(B) K086: Any waste water or ink sludge on hand will be transferred to ABN's "Giori" treatment area and processed through the treatment system.

Closure Procedure for Hardening Room

In the event it becomes necessary to close the Hardening Room, the following procedure will be observed:

(1) Both Hardening furnaces will be heated until the sodium cyanide is liquified;

(2) The molten cyanide will be ladled into 20 lbs metal containers. As much of the molten cyanide as possible will be removed;

(3) When the containers are cooled, hazardous waste labels with all necessary information shall be affixed thereto. A record of each container will be made in the Inventory Record - Cyanide Waste Material Log Book;

(4) All contained sodium cyanide material will be destroyed as soon as possible;

(5) Each furnace (Gas and Electric) will be closed down to allow the remaining sodium cyanide waste to cool and harden;

(6) Hardening pots from both furnaces, and the electrodes from the electric furnace, will be removed and placed into the cyanide destruction tank. Each item will be washed thoroughly to remove all sodium cyanide waste. This washing procedure will be done several times to assure safe handling of the equipment;

(7) Additional water will be added to top off the tank and the water will be treated before dumping.

(8) Any new sodium cyanide waste in inventory will be sold back to the supplier.

Financial Responsibility:

ABN has been advised by its insurance broker that a bond is not required by ABN to ensure compliance with the Closure Plan. However, the Company is prepared to obtain such a bond, if so requested by the EPA, in an amount sufficient to ensure that the Closure Plan is Fully implemented.

HAZARDOUS WASTE REVIEW

Since the hazardous waste inspection conducted at our Plant by Ms. Janet De Biasio and Mr. Evan Liblit of the New York Hazardous Waste Section, Solid Waste Branch, American Bank Note Company ("ABN") has taken the following steps to correct the deficiencies noted in Ms. De Biasio's inspection report:

A) Ink: Samples of ABN ink were analyzed for EPA toxcity by the U.S. Testing Lab and the analysis indicated that the lead content of ABN inks was below toxic levels. Nevertheless, ABN had insituted a program to remove the lead compounds from its inks. This program has been very successful and lead-free inks now account for 70% of all inks produced by ABN.

B) Sodium Cyanide: ABN's Research Department has developed a feasible method of destroying sodium cyanide waste. A permanent installation is currently being erected in ABN's pail-washing area located in the back yard outside the Plant. This installation will be completed by the end of March, 1983. Upon completion of this installation, ABN will have the capacity to destroy 250 pounds of sodium cyanide waste per week. Currently there is 6174 pounds of such waste in inventory.

C) K086: The K086 waste is currently being analyzed by the U.S. Testing Lab to determine whether it is toxic under CPA standards. If not, this waste will be neutralized in our effluent treatment plant which has a capacity of 2800 liters per hour.

D) Miscellaneous: All waste drums containing sodium cyanide are now clearly marked and dated in compliance with EPA labelling requirements. ABN's operating record has been updated and inspections are conducted in accordance with a regular schedule. Waste drums have been transferred to a locked storage area in the yard outside of the Plant.

Conclusion:

American Bank Note Company's Bronx Plant is a security printing facility where such highly negotiable documents such as stock certificates, bonds, U.S.Food Coupons, foreign currency, travelers checks, etc. are printed.

In the event it becomes necessary to close the Bronx facility, detailed records of security items on hand would have to be checked and audited; e.g. documents, plates, dies and rolls. Furthermore, the actual transfer or destruction of these security items would take considerable time, during which the destruction and elimination of any hazardous waste on hand could be completed.

At this time, management does not anticipate that the Bronx facility will be closed.

American Bank Note Company
Garrison Ave. & Tiffany St.
New York, N.Y. 10474

April 29, 1985

Mr. John L. Middelkoop, P.E.
Supervisor, Permit Section
Bureau of Hazardous Waste Technology
Division of Solid & Hazardous Waste
New York State Dept. of Environmental
Conservation
50 Wolf Road
Albany, New York 12233-0001

Dear Mr. Middelkoop:

Re: EPA ID No. NYD091214718

In response to your letter of April 16, I submit the following additional information, as requested, to ensure proper closure of our hazardous waste storage facility:

A. Facility Condition

1. Layout of the facility is attached.

2. Waste description:

   Solid slag skimmed off molten sodium cyanide hardening bath. Contains primarily carbon and approximately 5% sodium cyanide (average concentration). Lump form, ranging from lumps several pounds in size to sand like granules.

3. Equipment involved in handling hazardous waste (storage facility only):

   Waste was handled in sealed metal drums, containing on the average 200 lbs. of accumulated waste. These drums were handled manually or with a fork lift. Neither the operators nor the equipment came in contact with the waste. The drums were sealed in the hardening facility prior to storage.

B. Facility Decontamination

1. List of contaminated equipment:

   None

2. Wash down of storage area:

   We have no reason to believe that the storage area has been contaminated with cyanide since only sealed drums were stored and no leakage had occurred. However, we shall wash down a representative area and test the wash water for cyanide. If cyanide is present, we shall wash down the entire area and dispose of the wash water through an authorized disposal facility.

3. Method of determining that the storage area is decontaminated:

   See item B. 2.

4. List of equipment to be used for decontamination:

   Mops and buckets with wringers; steel drum for the wash water

5. Quantity of residue expected to be accumulated:

   Maximum of 25 gallons

6. Residue (wash water) will be disposed of through Chemical Waste Disposal Corp. - Astoria, N. Y. The cleaning equipment will have been decontaminated in the process of decontamination of the area. (Area will be washed until wash water is free of cyanide).

C. Closure Certification

As soon as we have assurance that the storage area is free of cyanide contamination we shall prepare a certification to this effect by an executive officer of the company and an independent professional engineer.

D. Closure Cost Estimate

The revised closure plan involves washing down of the storage area and testing of wash water for cyanide. The estimated cost is:

a.	labor: 5 hours @$10/hr.	$ 50
b.	analysis: 3 samples @$ 50	$150
c.	disposal of residue: 1 drum @$300	$300
	Total	$500

Cost of closure certification and inspection is uncertain as of this date. However, the total closure cost, including contingencies, administrative costs and the engineers fee should not exceed $1,500.

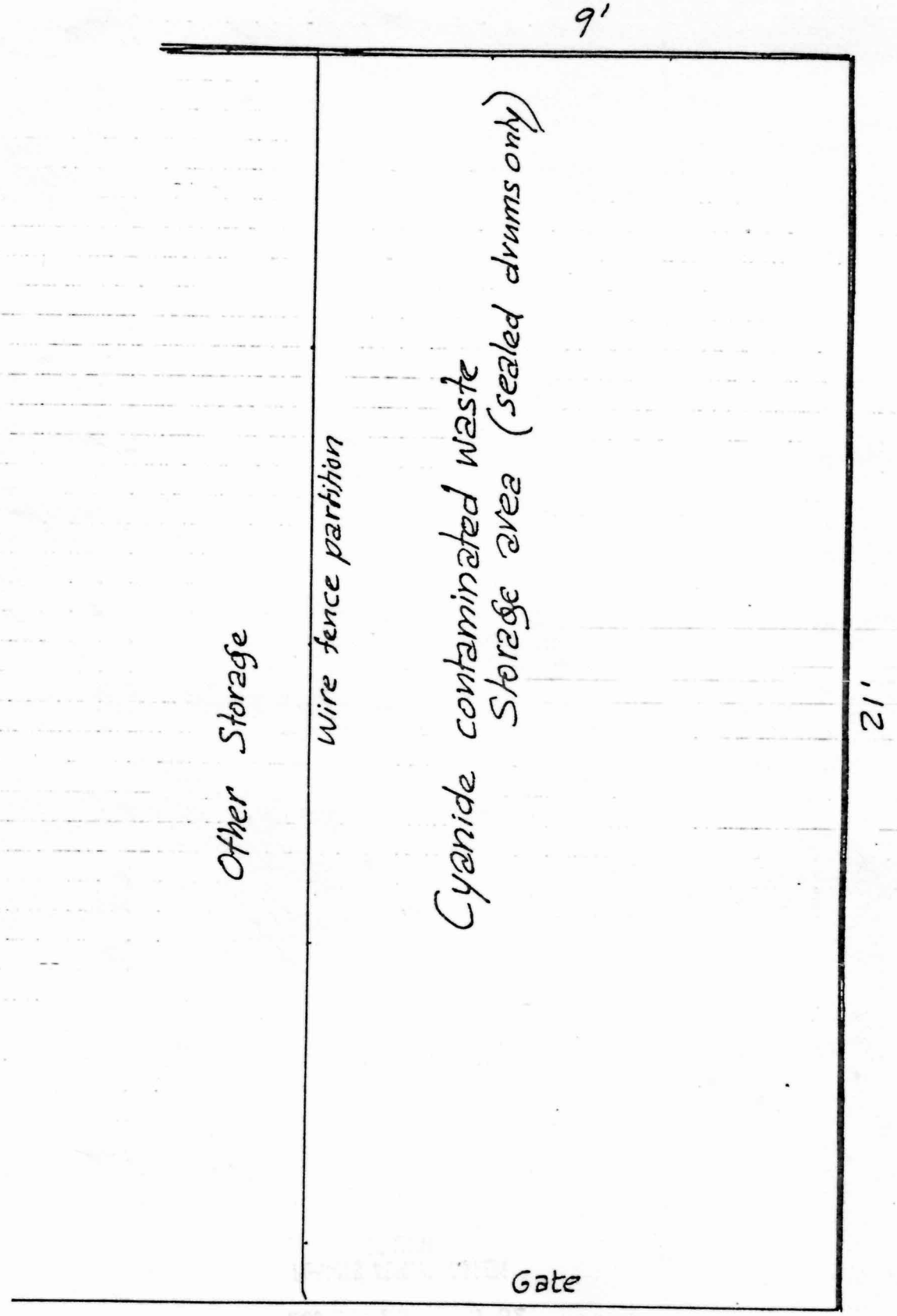
We shall proceed promptly with the test analysis, wash down if required, and will submit a certification of decontamination as soon as we have the required data.

Sincerely,

S. W. Paul Wyszkowski

S. W. Paul Wyszkowski
Director
Research & Product Development

dmg
cc: E. Deadrick
C. Troy
J. Volpe
S. Ervolina - N. Y. Dept. of Environmental Conservation



(?)

9x19'

ABN Hazardous Waste Storage Facility

Lay Out Plan

New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233-0001

Henry G. Williams
Commissioner

JUL 25 1985

PAB

Mr. James M. Reidy, P.E.
Chief
New York Hazardous Waste Section
U.S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, NY 10278

Dear Mr. Reidy:

Re: American Bank Note Company
EPA I.D. No. NYD091214718

Enclosed is a copy of a closure plan for the referenced facility. The closure plan, dated March 29, 1985 with addendum dated April 29, 1985 appear to meet the requirements of RCRA and 6NYCRR Part 373-3, and we have instructed the company to have a public notice put in the New York Times.

If you have any comments on the closure plan, please contact Ms. Michelle Taylor, of my staff, at (518) 457-3274. Pending any public comments, we anticipate that the closure plan might be approved by September 16, 1985.

Sincerely,

John L. Middelkoop P.E.

John L. Middelkoop, P.E.
Supervisor
Permit Section
Bureau of Hazardous Waste Technology
Division of Solid and Hazardous Waste

Enclosures

cc w/encs. - M. Taylor

American Bank Note Company
Garrison Ave. & Tiffany St.
New York, N.Y. 10474

March 29, 1985

Mr. John L. Middelkoop, P.E.
Supervisor, Permits Section
Bureau of Hazardous Waste Technology
New York State Dept. of Environmental
Conservation
50 Wolf Road
Albany, New York 12233-0001

Dear Mr. Middelkoop:

In response to your letter of March 18, 1985, I attach the closure plan for our hazardous waste storage facility, with sincere apologies for not submitting it when requested. I was unable to look after this matter personally as would be the case in the normal course of events and, unfortunately, the person assigned the task did not fully appreciate its import.

The closure plan, as you will note refers to the storage facility only. Actually a closure plan for the generating facility and the storage facility had been submitted in October, 1983 (copy attached).

The cyanide hardening bath facility is currently generating cyanide contaminated waste at the rate of less than 5 kg per month. We expect to close this facility in June, 1985.

Sincerely,

S. W. Paul Wyszkowski

S. W. Paul Wyszkowski
Director
Research & Product Development

March 29, 1985

Closure of Storage Facility

The storage area that is set aside to contain contaminated cyanide slag is a 9'x19' secured cage located at our Bronx location and will hold 45 drums of waste. In the event it becomes necessary to close the storage area, which should take approximately 30 days, the company will contact:

Chemical Waste Disposal Corporation
42-17 19th Avenue
Astoria, New York

They are located within ten miles of our facility and will cart the drums of contaminated cyanide slag away.

The storage facility will be broom swept and free from any contaminated cyanide slag. The sweepings will be collected and contained in a drum and disposed of through Chemical Waste Disposal Corp.

March 29, 1985

Closure of the Hazardous Waste Storage Area

As of February 10, 1984, the storage facility which contained 26 drums of contaminated cyanide slag, was closed. The 26 drums of contaminated slag were carted away by:

Chemical Waste Disposal Corporation
42-17 19th Avenue
Astoria, New York

The entire area was broom swept. The sweepings were collected in a drum for disposal to Chemical Waste Corporation.

October 20, 1983

ABNCo. Cyanide Hardening Bath & Waste Cyanide Storage Facility Closure Plan

1. Introduction

American Bank Note Co. operates in its Bronx, N. Y. facility a cyanide hardening bath for steel plates which consists of approximately 200 kg of molten sodium cyanide in a tank heated by carbon electrodes immersed in the cyanide. In course of use, a slag forms on top of the bath which consists primarily of carbon. This slag is removed periodically and is currently being accumulated in the Cyanide Waste Storage Area at the rate of 10-20 kg per month. The slag contains, on the average, 8% sodium cyanide.

Approximately 3000 kg of the slag has been accumulated in the Cyanide Waste Storage Area to date. An application has been filed for a permit to store and treat this material on site. ABNCo. has interim status with respect to storage as an existing facility, but not with respect to treatment.

2. How the facility will be closed

In the event it becomes necessary to close the facility, the following steps will be taken:

a. Molten cyanide in the bath will be ladled into metal containers holding about 10 kg each.

b. When the containers are cooled they will be labelled and recorded and removed to the Cyanide Waste Storage Area.

c. The bath will be shut down. After cooling, the bath tank and the heating electrodes will be thoroughly washed with water to dissolve all remaining sodium cyanide. The wash water will be stored in drums in the Cyanide Waste Storage Area.

d. Unused sodium cyanide in inventory will be returned to the supplier.

e. Assuming ABNCo. will have been granted a permit to treat cyanide waste, the material in the Cyanide Waste Storage Area will be dissolved in water as required and treated using the Kastone process of cyanide destruction. The effluent from the treatment process, containing less than 1 ppm of cyanide, will be drained into a P.O.T.W. Alternatively, if ABNCo. does not at the time of closure have a permit to treat the cyanide waste, the accumulated waste, including the wash water, will be disposed of by an authorized hazardous waste treatment facility, such as Chemical Waste Disposal Corp. of Astoria, N. Y. at the approximate cost of $365 per container (1983 estimate).

The above steps (a through e) will effectively destroy all cyanide waste at the Bronx facility.

3. Maximum inventory of waste in storage during the lifetime of the facility

ABNCo. does not foresee that the hardening bath facility will be closed in the near future. However, its use will continue to decline over the years. The present level of cyanide waste inventory (3000 kg) is close to maximum and is not expected to increase greatly before the permit to treat is granted. After treatment begins, the waste cyanide inventory will be initially reduced by about 100 kg per week. When the accumulated waste has been all treated, the currently generated waste will be treated on a regular basis to maintain the waste inventory below 12 kg (equivalent to 1 kg sodium cyanide).

4. Estimated schedule for closure

From the time of decision to close the facility, the following are the estimated times to carry out the closure procedures:

a.	Removal of molten cyanide	1 week
b.	Wash up of cyanide bath equipment	1 week
c.	Treatment of accumulated cyanide waste and wash water (at maximum inventory)	30 weeks
	Total	32 weeks

5. Postclosure

Since all hazardous material will have been destroyed after completion of closure of the Cyanide Hardening Bath and Cyanide Waste Storage Area, no post-closure care will be required.

S. W. Paul Wyszkowski
Assistant to Vice President
Research & Product Development

Summary of Findings

Facility Description and Operations

American Bank Note Co. is a security printer, printing foreign currency, traveler's checks, securities and other forms of monetary instruments. The company makes their own ink and printing plates. Inks are made from vegetable oil + pigments. Some are lead based.

Plates are made from Nickle plating solutions from steel masters. Cyanide treatment is used to harden steel.

The processes on site include

1) Chrome plating facility of 3 tanks 360 gallons each. There is no waste. The tanks are never cleaned out. Rinse waters are discharged to a POTW. Due to the process & expenses there is little dragout, therefore the chromic acid in the rinse water is very small.

2) Nickle plating process - four tanks. No waste. The tanks have not been cleaned in 20 years. The chemicals used are Ni Sulfanate, Boric Acid and a wetting agent. A carbon treatment process rejuvenates the chemicals.

3) Nickle is shaved off the backs of the nickle plated plates. The shavings are collected and sold as scrap. Not a haz. waste.

4) Incinerator - used for burning paper and energy recovery. It is ~~pry~~ pyrolitic and not used for hazardous waste.

5) Waste water treatment system used for ~~=~~ treating the solution used to clean the printing presses. The solution is mildly caustic and has no lead or chrome in it. The solution is flocculated the particles are removed and drummed, the

1 cont.

Describe the activities that result in the generation of hazardous waste.

the pH is adjusted and the neutralized water is discharged to the sewer. The company does not have a NPDES permit. The caustic solution has a pH ~~greater~~ below 12.5, therefore not a haz. waste.

6) The moulton salt dip emersion process or CN treatment area generates a solid waste of NaCN and carbon. The NaCN accounts for .8% of the waste. This is considered hazardous by the company.

7) The ink making equipment is cleaned and generates a waste considered to be K086. This waste is generated at a rate of 3 to 4 drums a year. It is disposed of in the municipal trash.

Identify the hazardous waste located on-site, and estimate the approximate quantities of each. (Identify Waste Codes)

The Sodium Cyanide waste has previously been generated from electric furnaces where the rate of generation was about one drum per month. Now the waste is generated from a gas furnace at a rate of ½ drum/month. Because the company plans to treat the waste on-site, no wastes have been disposed of since Nov 1980 therefore there are 25, 50 gal drums and 9, 10 gal drums of the NaCN/Carbon waste on site in their H.W. Storage area.

K086 waste is disposed of in small quantities in the municipal trash.

At the time of the inspection it was observed that there were about 50 ~~pale~~ pails that previously contained ink stacked in the driveway awaiting disposal via the company garbage truck to the municapal dump. These pails appeared to have more than one inch of ink left in them. Often there is a high percentage of Lead in the ink.

American Bank Note Company
Garrison Ave. & Tiffany St.
New York, N.Y. 10474

Late notific 80113.

June 23, 1981

NYD091214718

U. S. Environmental Protection Agency
Permits Administration Branch, Room 432
Region 2
26 Federal Plaza
New York, New York 10278

Gentlemen:

We deeply regret the late date of this submission. We have had a great deal of difficulty translating our operations into answers which would appropriately respond to the questions outlined in the Consolidated Permits questionnaire. Our firm is located within the limits of the City of New York, Bronx County and our effluent is treated by a POTW. This, I gather from the instructions supplied with the permit application, excludes our treatment facilities from the RCRA as long as we conform to the CWA.

The only material used in our operations in sufficient quantity to require a permit under the RCRA is sodium cyanide waste generated from our steel hardening process. At the present time we are storing this material until an adequate treatment process is in operation. It is for this temporary period of time that we require a storage permit. It is my understanding, from discussions with our local EPA office, that once we begin treatment and reduce the quantity of stored material that the permit will no longer be required and our conformance to the CWA will, at that time, be required. Please note that the material is 0.8% active.

I am submitting a general building plan of our entire facilities indicating the area used for sodium cyanide storage as well as photographs of the storage area. As I interpret the Consolidated Permits Application form these materials should adequately answer the questions raised. Should you require any further information or materials please contact me.

Very truly yours,

A. LaCapria

A. LaCapria
Research Director

June 22, 1991

U. S. Environmental Protection Agency
Permits Administration Branch, Room 635
Walton S
26 Federal Plaza
New York, New York 10278

Gentlemen:

We thank God a great deal of
We hereby request the face date of this amendment. We have had a great deal of
difficulty transmitting our permitted full-time employees which would appropriately
respond to the questions outlined in the consolidated permit documentation.
Our firm is located midpoint Italy of the city of New York, Bronx County and
our efficient is treated by a POTW. Late, I further time the transactions supplying
with the permit application, excluded our treatment facilities from the RCRA as
long as we comply to the CAP.

The only material used in our operations is sulfuryant dmmxtfy to neutre a
permit under the RCRA is toxic waste since Generated from our area pendentint
process. As the present time we are storing this material until an adequate
treatment process is in operation. It is ten this temporary period of time that
we require a storage permit. If is an understanding, from discussions with our
local EPA office, that once we begin treatment and reduce the quantity of stored
material that the permit will no longer be required but our conformance to the
CAP will, at that time, be required. Please note that the material is 0.25 acrive.

I am submitting a General building plan of our entire facility indicating the
area used for sodium chloride storage as well as photographs of the storage area.
As I interpret the consolidated permits application form these materials should
adequately answer the questions raised. Should you require any further information
or materials please contact me.

Very truly yours,

A. Ingrata
Operation Director

HAZARDOUS WASTE FACILITY
CERTIFICATE OF LIABILITY INSURANCE

1. Name of Insurer: Commerce & Industry
Address of Insurer: 70 Pine St.
New York, N.Y. 10270

hereby certifies that it has issued liability insurance covering bodily injury and property damage to:

Name of Insured: American Bank Note Co.
Address of Insured: 70 Broad St.
New York, N.Y. 10004

in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at (Various Locations - See Below) for "sudden accidental occurrences." The limits of liability are $ 1,000,000. each occurrence and $ 1,000,000. annual aggregate, exclusive of legal defense costs. The coverage is provided under policy number MP6129448 issued on 1/1/83. The effective date of said policy is 1/1/83.

2. The insurer further certifies the following with respect to the insurance described in Paragraph 1:

(a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.

(b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).

(c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.

(d) Cancellation of the insurance, whether by the Insurer or the insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

(e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151(j) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

SCHEDULE

Name of Facility	Address or Location	EPA Identification Number
American Bank Note Co. Bronx Plant	Garrison Ave. and Tiffany St. Bronx New York 10474	NYD091214718

Supervisory underwriter

Authorized Representative & Title

(Type Name) _____

Name of Insurer Commerce & Industry

Address of Insurer 70 Pine St. N.Y. , N.Y.

HAZARDOUS WASTE FACILITY
CERTIFICATE OF LIABILITY INSURANCE

1. Name of Insurer: The Home Insurance Co.
   Address of Insurer:

hereby certifies that it has issued liability insurance covering bodily injury and property damage to:

Name of Insured: American Bank Note Co.
Address of Insured: 70 Broad St.
New York, N.Y. 10004

in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at (Various Locations - See Below) for "sudden accidental occurrences." The limits of liability are $5,000,000. each occurrence and $5,000,000. annual aggregate in excess of the underlying limits of $1,000,000. each occurrence and $1,000,000. annual aggregate exclusive of legal defence costs. The coverage is provided under policy number HEC1413039 issued on 1/1/83. The effective date of said policy is 1/1/83.

2. The insurer further certifies the following with respect to the insurance described in Paragraph 1:

(a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.

(b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).

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I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151(j) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

SCHEDULE

Name of Facility	Address or Location	EPA Identification Number
American Bank Note Co. Bronx Plant	Garrison Ave. and Tiffany St. Bronx New York 10474	NYD091214718

Regina M. Walsh Sr. Underwriter
Authorized Representative & Title

(Type Name _____

Name of Insurer Home Ins. Co.

Address of Insurer 80 Pine St. 10005
N.Y. N.Y

Continued from page 4.

NYD091214718

Form Approved OMB No. 158-S80004

V. FACILITY DRAWING *(see page 4)*

American Bank Note

PLEASE REFER TO BUILDING PLAN.

CLOSURE PLAN

American Bank Note Company - Bronx Plant
I.D. Number NYD091214718

October 20, 1983

ABNCo. Cyanide Hardening Bath & Waste Cyanide Storage Facility Closure Plan

1. Introduction

American Bank Note Co. operates in its Bronx, N. Y. facility a cyanide hardening bath for steel plates which consists of approximately 200 kg of molten sodium cyanide in a tank heated by carbon electrodes immersed in the cyanide. In course of use, a slag forms on top of the bath which consists primarily of carbon. This slag is removed periodically and is currently being accumulated in the Cyanide Waste Storage Area at the rate of 10-20 kg per month. The slag contains, on the average, 8% sodium cyanide.

Approximately 3000 kg of the slag has been accumulated in the Cyanide Waste Storage Area to date. An application has been filed for a permit to store and treat this material on site. ABNCo. has interim status with respect to storage as an existing facility, but not with respect to treatment.

2. How the facility will be closed

In the event it becomes necessary to close the facility, the following steps will be taken:

a. Molten cyanide in the bath will be ladled into metal containers holding about 10 kg each.

b. When the containers are cooled they will be labelled and recorded and removed to the Cyanide Waste Storage Area.

c. The bath will be shut down. After cooling, the bath tank and the heating electrodes will be thoroughly washed with water to dissolve all remaining sodium cyanide. The wash water will be stored in drums in the Cyanide Waste Storage Area.

d. Unused sodium cyanide in inventory will be returned to the supplier.

e. Assuming ABNCo. will have been granted a permit to treat cyanide waste, the material in the Cyanide Waste Storage Area will be dissolved in water as required and treated using the Kastone process of cyanide destruction. The effluent from the treatment process, containing less than 1 ppm of cyanide, will be drained into a P.O.T.W. Alternatively, if ABNCo. does not at the time of closure have a permit to treat the cyanide waste, the accumulated waste, including the wash water, will be disposed of by an authorized hazardous waste treatment facility, such as Chemical Waste Disposal Corp. of Astoria, N. Y. at the approximate cost of $365 per container (1983 estimate).

The above steps (a through e) will effectively destroy all cyanide waste at the Bronx facility.

3. Maximum inventory of waste in storage during the lifetime of the facility

ABNCo. does not foresee that the hardening bath facility will be closed in the near future. However, its use will continue to decline over the years. The present level of cyanide waste inventory (3000 kg) is close to maximum and is not expected to increase greatly before the permit to treat is granted. After treatment begins, the waste cyanide inventory will be initially reduced by about 100 kg per week. When the accumulated waste has been all treated, the currently generated waste will be treated on a regular basis to maintain the waste inventory below 12 kg (equivalent to 1 kg sodium cyanide).

4. Estimated schedule for closure

From the time of decision to close the facility, the following are the estimated times to carry out the closure procedures:

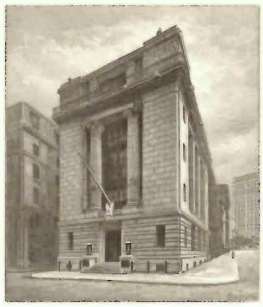
a.	Removal of molten cyanide	1 week
b.	Wash up of cyanide bath equipment	1 week
c.	Treatment of accumulated cyanide waste and wash water (at maximum inventory)	30 weeks
	Total	32 weeks

5. Postclosure

Since all hazardous material will have been destroyed after completion of closure of the Cyanide Hardening Bath and Cyanide Waste Storage Area, no post-closure care will be required.

S. W. Paul Wyszkowski
Assistant to Vice President
Research & Product Development

12/29 Completeness review - o.K. Coded. Ltr.



AMERICAN BANK NOTE COMPANY

70 BROAD STREET, NEW YORK, N.Y. 10004

TELEPHONE: (212) 425-5100

CABLE ADDRESS "BANKNOTE" NEW YORK

Regional Administrator
Region II
U.S. Environmental Protection Agency
26 Federal Plaza
New York, New York 10278

Dear Madam:

I am the chief financial officer of the American Bank Note Company, 70 Broad Street, New York, New York 10004. This letter is in support of this firm's use of the financial test to demonstrate financial assurance, as specified in Subpart H of 40 CFR Parts 264 and 265.

1. This firm is the owner or operator of the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:

   American Bank Note Company - Bronx Plant
   Garrison Avenue and Tiffany Street
   Bronx, New York 10474
   EPA Identification Number NYD091214718

   Current Closure Cost Estimate: $30,000.
   Current Post-Closure Cost Estimate: Not applicable.

2. This firm guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure or post-closure care of the following facilities owned or operated by its subsidiaries. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: None.

3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this firm, as owner or operator or guarantor, is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility: None.

4. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: None.

This firm is not required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on the last Sunday in December. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended December 26, 1982.

ALTERNATIVE I **

1.	Sum of current closure and post-closure cost estimates (total of all cost estimates shown in the four paragraphs above)	$ 30,000.
*2.	Total liabilities (if any portion of the closure or post-closure cost estimates is included in total liabilities, you may deduct the amount of that portion from this line and add that amount to lines 3 and 4)	$23,070,000.
*3.	Tangible net worth	$25,456,000.
*4.	Net worth	$26,089,000.
*5.	Current assets	$22,951,000.
*6.	Current liabilities	$13,463,000.
*7.	Net working capital (line 5 minus line 6)	$ 9,488,000.
*8.	The sum of net income plus depreciation, depletion, and amortization	$ 448,000.
*9.	Total assets in U.S. (required only if less than 90% of firm's assets are located in the U.S.)	$ N/A

AMERICAN BANK NOTE COMPANY
NEW YORK

		Yes	No
10.	Is line 3 at least $10 million?	X	
11.	Is line 3 at least 6 times line 1?	X	
12.	Is line 7 at least 6 times line 1?	X	
*13.	Are at least 90% of assets located in the U.S.? If not, complete line 14	X	
14.	Is line 9 at least 6 times line 1?		
15.	Is line 2 divided by line 4 less than 2.0?	X	
16.	Is line 8 divided by line 2 greater than 0.1?		X
17.	Is line 5 divided by line 6 greater than 1.5?	X	

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(f) as such regulations were constituted on the date shown immediately below.

AMERICAN BANK NOTE COMPANY

By: E. C. Hicks
Ernest C. Hicks
Treasurer

Date: 11/23/83

** The amounts provided in ALTERNATIVE I above are for American Bank Note Company and its domestic (United States) subsidiaries.

Ernst & Whinney

153 East 53rd Street
New York, New York 10022

212/888-9100

November 23, 1983

Mr. Ernest C. Hicks
Treasurer
American Bank Note Company
70 Broad Street
New York, New York 10004

Dear Mr. Hicks:

At your request, we have read your letter to the Regional Administrator of the Environmental Protection Agency, dated November 23, 1983 and compared the data which you have specified as derived from the consolidated financial statements of American Bank Note Company and subsidiary companies ("ABN") as of December 26, 1982, or checked the computation of such specified data using the amounts included in the aforementioned financial statements. Such data represents the domestic (United States) operations of ABN and its domestic subsidiary companies included in the aforementioned consolidated financial statements. We previously made an examination of ABN's consolidated financial statements in accordance with generally accepted auditing standards and, in our report dated March 2, 1983, expressed an unqualified opinion on ABN's consolidated financial statements for the year ended December 26, 1982 from which specified data was derived. Our review was made solely to assist you in complying with the regulations of the Environmental Protection Agency, and this report is not to be used for any other purposes.

Because the above procedures do not constitute an examination made in accordance with generally accepted auditing standards, we do not express an opinion on the specified data mentioned above. In connection with the procedures referred to above, no matters came to our attention that caused us to believe that the specified data, which represents the domestic (United States) operations of ABN and its domestic subsidiary companies, should be adjusted.

Very truly yours,

Ernst & Whinney

ERNST & WHINNEY

AMERICAN BANK NOTE COMPANY

70 BROAD STREET, NEW YORK, N.Y. 10004

TELEPHONE: (212) 425-5100

CABLE ADDRESS "BANKNOTE" NEW YORK

Joe Cuinar

Pls review attached for its adequacy

RICHARD A. COHEN

STAFF ATTORNEY

December 8, 1983

BY HAND

Mr. Ernest A. Regna
Chief
Solid Waste Branch
United States Environmental Protection Agency
Region II
26 Federal Plaza
New York, New York 10278

Re: In the Matter of American Bank Note Company
Bronx Plant, Docket No. II RCRA-83-0234
I.D.Number NYD091214718

Dear Mr. Regna:

In accordance with the terms of the Consent Agreement and Consent Order reached in settlement of the above-referenced proceeding, submitted herewith is all required documentation demonstrating our Company's compliance with the Resource Conservation and Security Act's financial requirements.

Also enclosed is our Company's revised Closure Plan which we would appreciate your filing on our behalf.

Very truly yours,

Richard A. Cohen

Richard A. Cohen

Enclosures

American Bank Note Company
Garrison Ave. & Tiffany St.
New York, N.Y. 10474

September 12, 1984

Mr. John L. Middelkoop, P. E.
Supervisor, Permits Section
Bureau of Hazardous Waste Technology
Division of Solid & Hazardous Waste
New York State Department of
Environmental Conservation
50 Wolf Road, Room 207
Albany, New York 12233

Dear Mr. Middelkoop:

Re: Hazardous Waste Storage Facility at the Bronx Plant

EPA ID No. NYD091214718

C1105:4
FC9
5/15/85
CP

This facility, operated under interim status, consisted of accumulated slag from our case hardening operation, awaiting proper disposal. The slag was contaminated with sodium cyanide, the average content being approximately 8%.

All of the accumulated slag in storage has been shipped off site for treatment by an authorized TSD facility. The Bronx storage facility is, therefore, no longer in existence and may be considered permanently closed.

We are currently a small generator of hazardous waste. Our production of the sodium cyanide contaminated slag (less than 8% Na CN average) amounts to approximately 10 lbs./month. This material is being shipped off site for treatment at an authorized TSD facility without storing.

Sincerely,

S. W. Paul Wyszkowski

S. W. Paul Wyszkowski
Director
Research & Product Development

cc: R. Baker ✓ USEPA
E. Deadrick
A. LaCapria
C. Troy
J. Volpe

AMERICAN BANK NOTE COMPANY

70 BROAD STREET, NEW YORK, N.Y. 10004

TELEPHONE: (212) 425-5100

CABLE ADDRESS "BANKNOTE" NEW YORK

November 12, 1980

EPA Region II
Information Service Center
26 Federal Plaza
New York, New York 10007

Gentlemen:

It is with our deepest regret that we submit Form 8700-12 at such a late date. An earlier response was not made due to an oversight on the part of our personnel. As a South Bronx firm, with a long history of civic and community interest and participation, we will naturally cooperate in any possible way with the regulations set forth by the Environmental Protection Agency.

Sincerely,

abc
enclosure

Anthony LaCapria
Director of Research

NYD 091 214 718

PRELIMINARY
RCRA FACILITY ASSESSMENT
AMERICAN BANK NOTE COMPANY
BRONX, NEW YORK
Work Assignment: R02040
(Ref. No. 1-635-393)

Prepared for:
U.S. Environmental Protection Agency

Contract: 68-W9-0003

TRC

TRC Environmental Corporation

Extra copy for 15th filerooom

TRC formerly Alliance Technologies Corporation
TRC Environmental Corporation

291 Broadway, Suite 1206
New York, NY 10007
☎ (212) 349-4616
Fax (212) 349-4648

November 30, 1993

Elizabeth Van Rabenswaay
Regional Project Officer
U.S. Environmental Protection Agency
Air and Waste Management Division
26 Federal Plaza, Room 1006
New York, New York 10278

Reference: Contract No. 68-W9-0003, TES-6
Work Assignment No. R02040
Multi Sites Preliminary RFAs
(Ref. No. 1-635-393)

Subject: Deliverable: Preliminary RCRA Facility Assessment for American Bank Note Company, EPA ID No. NYD091214718

Dear Liz,

In accordance with the reporting requirements of the subject Work Assignment, enclosed is one copy of the Preliminary RCRA Facility Assessment Report for the American Bank Note Company facility (EPA ID No. NYD091214718). Three bound and one unbound copies have been delivered directly to the WAM, John Nevius.

Questions concerning this submission should be directed to the TRC Project Manager, Michael F. Clark, P.E. or the undersigned at (212) 349-4616.

Sincerely yours,

Douglas Sullivan

Douglas Sullivan
Regional Manager

cc: John Nevius/EPA Work Assignment Manager
David Boyd/EPA TES-6 Contracting Officer (letter only)
Michael F. Clark/TRC Project Manager
TES ZPMO (letter only)

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PRELIMINARY
RCRA FACILITY ASSESSMENT
AMERICAN BANK NOTE COMPANY
BRONX, NEW YORK

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Air and Waste Management Division
26 Federal Plaza
New York, New York 10278

Work Assignment No.:	R02040
EPA Region:	II
EPA Site/Facility I.D. No.:	NYD091214718
Contract No.:	68-W9-0003 (TES-6)
TRC Document No.:	NY-R40.R25
TRC Project No.:	1-635-393-3-2000-0
TRC Project Manager:	Michael F. Clark P.E.
Telephone No.:	(212) 349-4616
Subcontractor:	N/A
Subcontractor No.:	N/A
Subcontractor Project Manager:	N/A
Telephone No.:	N/A
EPA Work Assignment Manager:	John G. Nevius
Telephone No.:	(212) 264-9578
Date Prepared:	November 24, 1993

TRC ENVIRONMENTAL CORPORATION
291 Broadway, Suite 1206
New York, New York 10007
(212) 349-4616

TRC

TABLE OF CONTENTS

TABLES

FIGURES

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1.0 INTRODUCTION

TRC Environmental Corporation (TRC - formerly Alliance Technologies Corporation) was requested by the U.S. Environmental Protection Agency (EPA) under EPA Contract No. 68-W9-0003 (TES-6), Work Assignment No. R02040, to perform a Preliminary RCRA Facility Assessment (RFA) of the American Bank Note Company (ABN) facility in Bronx, New York (EPA Facility I.D. No. NYD091214718). Tasks were performed in accordance with the Preliminary RFA Scope of Work provided by EPA on June 8, 1993, and TRC's Work Plan, dated July 6, 1993.

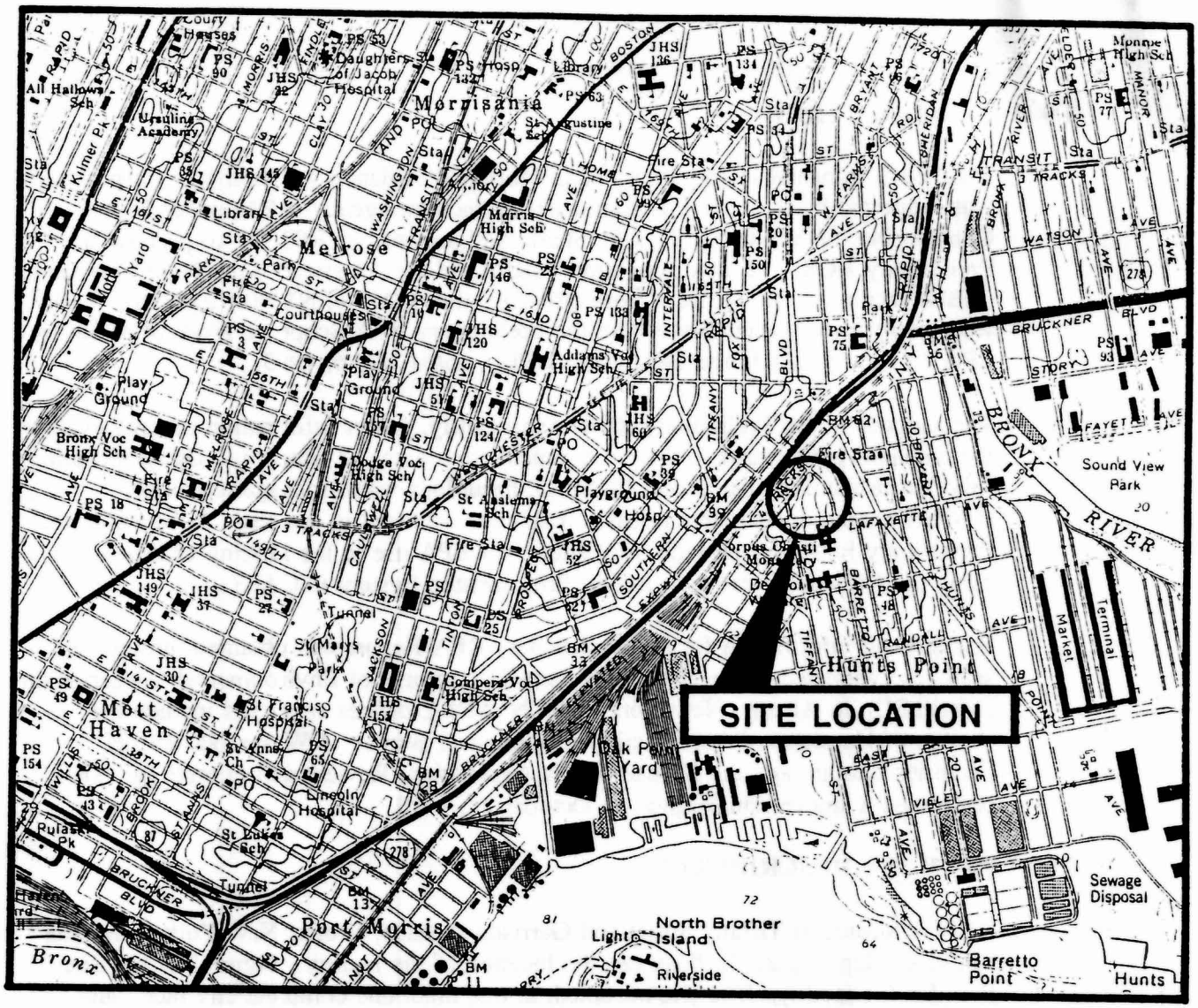
The purpose of the Preliminary RFA is to identify, gather information on, and evaluate the potential for releases to the environment from areas of concern (AOCs), including solid waste management units (SWMUs), hazardous waste management units (HWMUs), and areas where releases may have occurred in the past. In addition, the Preliminary RFA will provide information for EPA use in the ranking of this facility using the National Corrective Action Prioritization System (NCAPS).

Background information for this Preliminary RFA Report was obtained through file searches conducted at the New York State Department of Environmental Conservation (NYSDEC), in Albany, New York. The NYSDEC offices contacted include the Bureau of Hazardous Waste Facility Compliance, Bureau of Waste Wastewater Facilities Design, and the Bureau of Air Application, Review and Permitting. TRC performed a site reconnaissance on October 23, 1993.

2.0 FACILITY DESCRIPTION

ABN is located at Tiffany Street and Garrison Avenue, Bronx, New York. The Site Location Map, Figure 1, illustrates the location of the facility. Figure 2 is the Site Plan for the facility. The site occupied, at one time, one complete city block and portions of several adjacent blocks. The portion of the facility which occupies a complete city block consists of three buildings (with a total areal extent of 110,780 square feet), a small garage, landscaped areas and driveways. The remainder of the facility consists of additional warehouse buildings and a research building which occupy portions of adjacent city blocks. The entire property owned by ABN was (approximately) 6.32 acres (CDM, 1990).

TRC performed a site reconnaissance and observed that the main ABN complex, which occupies a complete city block, is occupied by three (3) buildings (see Figure 2). Building "A" is approximately five (5) stories high and Buildings "B" and "C" are approximately three (3) stories high. A driveway, parking lot and loading dock are located on the west side of the property. Pavement adjacent to the buildings was observed to have been cracked and patched in several places. A



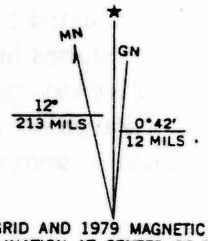
SCALE 1:24 000

1 ½ 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 .5 0 1 KILOMETER

QUADRANGLE LOCATION



UTM GRID AND 1979 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET

1966
PHOTOREVISED 1979

SOURCE: USGS 7.5 MINUTE TOPOGRAPHIC MAP QUADRANGLE, CENTRAL PARK, N.Y. - N.J.

TRC

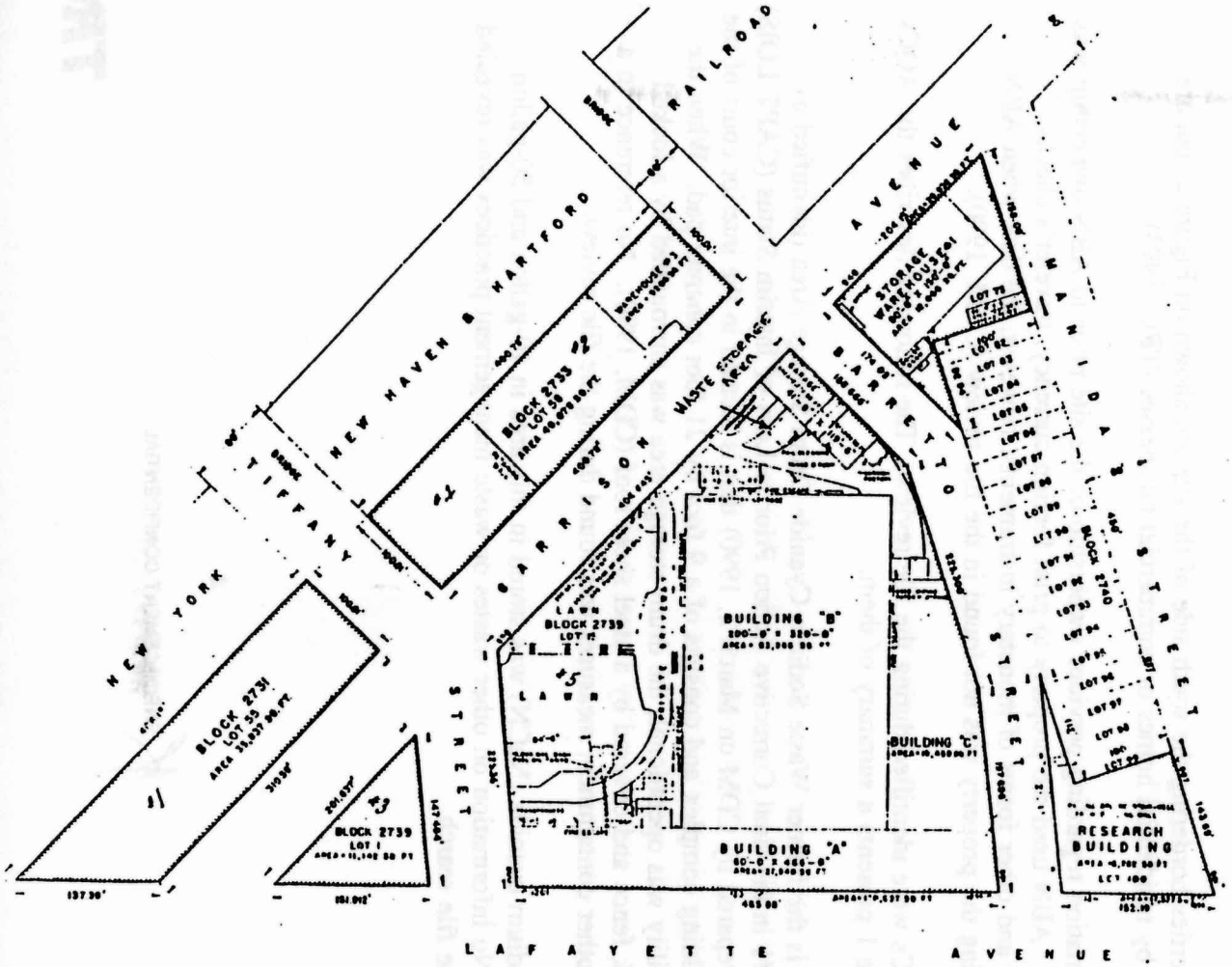
TRC Environmental Corporation
18 Worlds Fair Drive
Somerset, N.J. 08873

AMERICAN BANK NOTE COMPANY
TIFFANY STREET & GARRISON AVENUE
BRONX, NEW YORK

SITE LOCATION MAP

Date: 11•15•93	Proj.# 1635-3933-2	Fig. 1

WORK ASSIGNMENT NO. R02040



SOURCE: BASE MAP CDM FPC (CAPT LOIS REPORT), MARCH 2 1990

AMERICAN BANK NOTE COMPANY
TIFFANY ST. & GARRISON AVE.
BRONX, NEW YORK

SITE PLOT PLAN

TRC Environmental Corporation TRC 18 Worlds Fair Drive Somerset, N.J. 08873	designed by K.P.	scale NONE
	drawn by N.E.	date 11•15•93
	checked by	project no.
TRC PROJECT NO. 01635-3933-20000		sheet no. Fig. 2

garage is located at the north end of the site. The remaining portions of the property are occupied by trees and scrub vegetation (weeds) (TRC, 1993).

The surrounding properties include commercial businesses or residential housing (see Figure 2). A service station is located across Tiffany Street from the main facility (Block 2739, Lot 1). A McDonalds restaurant is located across Garrison Avenue from the service station (Block 2739, Lot 55). To the northeast of the McDonalds is a fenced asphalt parking lot and a warehouse which was once used by ABN (Block 2733, Lot 58). To the north of the warehouse are small stores and vegetable stands (TRC, 1993).

To the north of the ABN garage, across Baretto Street, is a warehouse which was used by ABN. The former ABN research building is located to the east of Building "A" (Block 2748, Lot 100). Residential housing is located northeast of the site between the warehouse and research buildings (Block 2740, Lots 82099) (TRC, 1993).

The properties bordering the south side of the site are shown on Figure 2, but are occupied by residential homes or commercial businesses (TRC, 1993).

No information regarding previous ownership of the site prior to ABN ownership was available. ABN used the property to print foreign currency, traveler's checks, securities and other forms of monetary instruments; however, the date when ABN began using the property was not found in the file review (CDM, 1990).

Five AOCs were identified during the file review. The following describes the AOCs and Table 1 presents a summary of them.

AOC #1 is the former Waste Sodium Cyanide Drum Storage Area (identified as SWMU #1 in the final Corrective Action Prior to Loss of Interim Status (CAPT LOIS) report, prepared by CDM on March 2, 1990) that is located in the interior court of the ABN building complex and consists of a 9 foot by 21 foot concrete pad. When the ABN facility was operational, the drum storage area was surrounded by a locked chain-link fence and covered by a steel sheet roof (CDM, 1990). No reference to a berm or other containment measures was found during the file review.

Waste sodium cyanide (NaCN) was stored in this area in 10-gallon and 50-gallon drums. No information on other wastes or waste management practices was revealed during the file search.

During the inspection by Versar, Inc. (a subcontractor for CDM) in June 1989, Mr. S. W. Paul Wyszkowski, the Director of Research for ABN, stated that he did not know of any spills or releases associated with the drum storage area. However, Versar observed dark staining of the rocks, soil and broken concrete in the vicinity of the drum storage area during the site inspection (CDM, 1990).

AOC #1 was officially certified closed when the entire facility was closed. Mr. Gary Rozmus, P.E., of Eders Associates (Consulting Engineers) certified closure of the "Cyanide Storage Area" on November 27, 1985. A copy of the closure certification is included in Appendix B. After removal of the drums, the concrete pad was swept and mopped. The wastewater from the cleaning was subsequently sampled to determine the cyanide content. In addition, two (2) wipe samples were collected from the pad itself and analyzed for cyanide. The results of the sampling are available and presented in Table 1.

AOC #2 is the former cyanide heat treating area and is located on the fourth floor of the facility (CDM, 1990). No details regarding the exact location of the room or the room construction were found in the information reviewed.

The closure inspection which was performed by the NYSDEC in 1986, revealed that the cyanide heat treating area had been cleaned and a new floor had been installed. No evidence of residue was observed at the time (NYSDEC, 1986).

During the site inspection by Versar, Inc. in June 1989, the floor of this area was observed to be badly stained. In addition, Mr. Wyszkowski of ABN indicated that concrete core samples had been collected in the room; however, he had no further information on the samples (CDM, 1990). No sample analyses or sample location map had been found during the file search.

AOC #3 is the former chrome plating area. The report of the 1986 closure inspection by the NYSDEC noted that there was evidence of residue in this area, and it would have to be cleaned and decontaminated (NYSDEC, 1986). During Versar's site inspection, it was observed that the chrome plating area was being used for the storage of miscellaneous materials. The only evidence that was observed of the former chrome plating activities was the rusted condition of the pipes and lighting fixtures on the ceiling (according to Mr. Wyszkowski, this was attributable to the chrome plating operation) (CDM, 1990).

Versar also contacted Eders Associates, a consulting engineering company, regarding decontamination and sampling of the chrome plating area. Mr. Anders Brunelle told Versar that Eders Associates had collected wipe and core samples in the area, removed equipment and power washed and wet vacuumed the room. Mr. Brunelle also

TABLE 1. AOC SUMMARY

Area of Concern (AOC)	AOC Description	Operation Dates	Release Status	Reference	Medium/ Compounds Detected	Off-Site Migration Potential
#1 Former Waste Sodium Cyanide (NaCN) Drum Storage Area (HWMU)	Storage area located in the interior court of the building; 9'x21' concrete pad, chain-link fence, sheet metal roof	Unknown/1986	Low potential of release	CDM FPC, 1990	Cyanide (CN): A - 104 mg B - 96 mg Sodium Cyanide (NaCN): A - 196 mg B - 182 mg CN/Sq. Ft. (in mg/sq.ft.) A - 0.55; 8 - 0.51	Low
#2 Cyanide Heat Treatment Plate Hardening Area (HWMU)	Fourth floor of the building complex; concrete floor	Unknown/Unknown (presumed 1986)	Low potential of release	NYSDEC, 1986 CDM FPC, 1990	Unknown (no lab results available)	Low
#3 Former Chrome Plating Area (HWMU)	Interior of building complex; concrete floor	Unknown/Unknown (presumed 1986)	Low potential of release	NYSDEC, 1986 CDM FPC, 1990	Unknown (no lab results available)	Low
#4 Former Photographic Silver Sensitizing Area (HWMU)	Interior of building	Unknown/Unknown (presumed 1986)	Low potential of release	NYSDEC, 1986 CDM FPC, 1990	Unknown	Low
#5 Gasoline pump (probably associated with an underground storage tank)	Adjacent to garage at the north end of the site	Unknown/Unknown (presumed 1986)	High - no sampling was conducted	NYSDEC, 1986 CDM FPC, 1990	Unknown	High (if release occurred)

informed Versar that the ceiling tiles and rugs of the room directly beneath the chrome plating area was discovered to be contaminated. The ceiling tiles, rugs and mats beneath the rugs were therefore removed (by another company) (Eders, 1989; CDM, 1990).

No sample analyses or sample location map was found during the file review.

AOC #4 is the former photographic silver sensitizing area. This area was reported in the 1986 closure inspection to show evidence of residue and would have to be decontaminated (NYSDEC, 1986). During Versar's 1989 inspection, Mr. Wyskowski was unable to locate the area due to the fact that the current owners of the site had changed the layout of the building (CDM, 1990).

No information was revealed during the file search to indicate that any sampling and analysis or remediation has been performed to date.

AOC #5 is the gasoline pump that was used at the facility. No mention was made in the files of an underground or aboveground storage tank; however, gasoline pumps are usually associated with underground storage tanks. The pump was located in the garage area which is located on the north side of the property adjacent to the intersection of Garrison Avenue and Barretto Street (see Figure 2). The NYSDEC closure inspection report stated that evidence of oil deposition on the ground was observed and that the area would have to be cleaned. The 1989 Versar inspection also observed evidence of soil staining; however, Mr Wyskowski had no information concerning the gasoline pump (CDM, 1990).

There was no information in the NYSDEC's files indicating that any sampling or remediation has been performed to date in this area.

No information for SPDES permits for the areas described above was found in the files. In addition, air permit information is pending a file review.

3.0 FACILITY ACTIVITY/HISTORY

ABN used the facility to print foreign currency, traveler's checks, securities, and other forms of monetary instruments. The company's operations that generated hazardous waste at the facility included printing plate manufacture and ink formulation (CDM).

The hazardous wastes generated at the facility consisted of cyanide contaminated waste and waste sludges. The cyanide hardening/treating bath, which was used in the manufacture of printing plants, generated the cyanide contaminated waste

(approximately 8 percent sodium cyanide (NaCN) content). The ink manufacturing equipment generated 3 to 4 drums per year of waste sludges (CDM, 1990).

No information was found in the files of the NYSDEC regarding previous ownership of the site. In addition, no information was found regarding ABN's ownership of the site or its operations until 1981 when ABN submitted a RCRA Part A permit application to the EPA for the waste sodium cyanide drum storage area (AOC #1).

On July 8, 1982, the EPA inspected ABN in order to determine its RCRA compliance. The subsequent report of the inspection noted several deficiencies. These deficiencies included: 1) containers that were not labeled or dated; 2) no closure plan for the facility; 3) no inspection schedule; 4) no record of operation; 5) ink pails that were not empty (as defined in 40 CFR 261.7); and 6) waste generated from the ink manufacturing equipment that was not being managed as hazardous waste (CDM, 1990).

On October 11, 1983, ABN signed a Consent Agreement and Consent Order with the EPA's Region II. This established the following: 1) financial assurance for closure (and post closure monitoring where appropriate); and 2) financial responsibility for bodily injury and property damage to third parties caused by sudden accidental occurrences arising from the operation of the facility. In addition to signing the Consent Agreement and Consent Order, ABN paid a civil penalty of $2,000,000 (CDM, 1990).

On September 7, 1984, the NYSDEC inspected ABN to determine its RCRA compliance. The ABN facility had filed as a Treatment, Storage, and Disposal facility (TSDF) under RCRA; however, the NYSDEC inspection revealed that the facility was actually a small quantity generator on the basis of the waste generated (less than 1,000 kilograms per month). The inspection also revealed that the waste generated in the ink formulation process had been tested by the U.S. Testing Company and found to be non-hazardous. However, the NYSDEC inspection found that the facility was in "non-hazardous compliance" with the following requirements: 1) personnel training; 2) contingency plan and emergency procedures; 3) general waste analysis; 4) general inspection procedures; 5) operating record documentation; and 6) closure plan documentation (CDM, 1990).

On March 29, 1985, ABN submitted a closure plan to the NYSDEC. The NYSDEC reviewed the closure plan and requested additional information. In response to the request, a closure plan addendum was submitted on April 29, 1985. NYSDEC reviewed the addendum and gave final approval to the closure plan on September 26, 1986 (CDM, 1990).

The ABN facility was sold on November 22, 1985 (CDM, 1990). TRC's site reconnaissance on October 23, 1993, revealed that the main property is currently occupied by a company which deals with various alarm systems including security alarms, fire alarms and sprinkler systems (TRC, 1993).

The NYSDEC performed a closure inspection on the facility on May 8, 1986. The inspection report stated that the hazardous waste storage area (where the drums of waste sodium cyanide were stored) and the cyanide heat treating area appeared to be in satisfactory condition; no hazardous waste or visible evidence of hazardous waste was observed. The report did, however, identify three areas that required remediation. Both the chrome plating area and the photographic area (which involved the silver sensitizing of printing plates) showed evidence of residues from past operations although no evidence of drums of hazardous waste or hazardous materials was observed. In addition, the NYSDEC inspection also revealed evidence of oil on the ground in the vicinity of the gasoline pump. As a result of this inspection, NYSDEC was going to require ABN to remediate the above described areas (CDM, 1990). No information has been found to indicate that the NYSDEC had conducted other site visits since May 1986.

On June 9, 1989, Versar, Inc. (a subcontractor for CDM) performed a site inspection for the EPA under TES 5, EPA Contract No. 68-W9-0002. Versar observed one SWMU the waste sodium cyanide drum storage area, and four AOCs including the cyanide heat treating/plate hardening area, the chrome plating area, the photographic silver sensitizing area, and the gasoline pump. The waste drum storage area had been certified closed and the cyanide heat treating area was listed as having been cleaned; however, Versar observed both areas to be stained. In addition, Versar did not find any documentation or certification in the NYSDEC's files concerning the cleanup or closure of the chrome plating area, the photographic silver sensitizing area, or the gasoline pump and recommended that these areas be thoroughly investigated.

Since the Versar site inspection of June 1989, more recent site inspections have not been performed according to the information reviewed during the file search. In addition, no information was available concerning the current use of the property.

4.0 ENVIRONMENTAL SETTING

There was no available information obtained from the file search regarding geology, water use, or environmentally sensitive areas in the vicinity of the site. TRC's site reconnaissance revealed however, that the topography in the vicinity of the site slopes to the west. No surface water bodies were observed in the immediate vicinity of the property; however, the East River is located approximately three-quarters of a mile

south of the site and the Bronx River is located approximately one-quarter mile east of the site. No geologic outcroppings were seen in the area of the site.

5.0 PRELIMINARY EVALUATION

Preliminary information regarding the AOCs are summarized in Table 1, and present a description, operation dates, release status, medium/compounds detected, and off-site potential.

Information that was not provided in the file review which should be collected and evaluated include:

- A floor plan of the facility indicating the location of the AOCs.
- Information on the processes that produce the waste and residues at the AOCs.
- Data from the wipe samples and core samples taken from the chrome plating area.
- Information regarding the site history and use prior to ABN's ownership.
- Environmental and geological information.

Based on the absence of documentation that any NYSDEC site visits have been conducted since 1989, the lack of complete information on the closure of several of the AOCs noted by Versar Inc., it appears that a visual site inspection at this facility is warranted.

6.0 SUMMARY

No information was available concerning previous ownership of the property. In addition, the date at which ABN began using the property was not found during the review of the NYSDEC files. The file review did, however, indicate that ABN used the property between 1981 and 1985 to print foreign currency, traveler's checks, securities, and other monetary instruments.

In May 1981, ABN submitted a RCRA Part A permit application to the U.S. EPA for the hazardous waste drum storage area. The EPA performed an inspection of ABN in July 1982 to determine the facility's RCRA compliance and found several deficiencies. ABN signed a Consent Agreement/Consent Order with the EPA in October 1983 in order to establish financial assurance for closure and financial responsibility for injury and/or property damage to third parties as a result of the facility's operations.

The NYSDEC inspected ABN in September 1984 in order to determine ABN's compliance with RCRA. The NYSDEC report indicated several non-compliance items, including the lack of a closure plan. ABN submitted a closure plan to the NYSDEC on March 29, 1985 and, in response to the NYSDEC's request, submitted an addendum on April 29, 1985. NYSDEC reviewed the closure plan and gave final approval on September 26, 1985.

The ABN facility was sold on November 22, 1985. As a result, the NYSDEC conducted a closure inspection on May 8, 1986. The hazardous waste drum storage area and the cyanide heat treating area were both found to be satisfactory. However, the chrome plating area and the photographic silver sensitizing area both showed evidence of residues from past operations and the gasoline pump showed evidence of oil deposition on the ground. NYSDEC required ABN to clean up these areas.

Versar, Inc. performed a site inspection for the EPA in June 1989. Since that time, no information has been found to indicate that other more recent inspections have been conducted. The review of the NYSDEC's files also did not indicate that any remediation has been performed or indicate the current use of the property.

REFERENCES

CDM, 1990. CDM Federal Programs Corporation, 1990. final Report Corrective Action Prior to Loss of Interim Status, American Bank Note Company, March 2, 1990.

Eder, 1986. Letter with attached Closure Certification from Anders N. Brunelle, Eder Associates-Consulting Engineers, P.C., to Michelle Taylor, NYSDEC, June 3, 1986.

NYSDEC, 1986. Memorandum with attached New York State Industrial Hazardous Waste Management Act Inspection List, from Jerome J. Riordan, NYSDEC, Region II, S&H Unit, to John Middlekoop, NYSDEC, Bureau of Hazardous Waste Technology, June 4, 1986.

TRC, 1993. Telecon between Kevin J. Phelan, TRC Environmental Corporation and Michael Miner, TRC Environmental Corporation, November 19, 1993.

APPENDIX A

CLOSURE DOCUMENTS

eder associates
consulting engineers, p.c.

June 3, 1986
File #524-1

Ms. Michelle Taylor
Assistant Sanitary Engineer
New York Department of
Environmental Conservation
50 Wolf Road
Albany, New York 12233

Dear Ms. Taylor:

Enclosed is the "Cyanide Storage Area Closure Certification" for American Bank Note Company (ABN), located in the Bronx, New York. The Cyanide Storage Area of this facility was closed in accordance with the approved closure plan on November 27, 1985.

If you have any questions, please call our office.

Very truly yours,

EDER ASSOCIATES CONSULTING ENGINEERS, P.C.

Anders N Brunelle

Anders N. Brunelle

ANB/td
Enc.

cc: J. Riordan

85 FOREST AVENUE • LOCUST VALLEY, NEW YORK 11560 • (516) 671-8440
LEONARD J. EDER, P. E. • FREDERICK H. INYARD, P. E. • STEPHEN J. OSMUNDSEN, P. E. • GARY A. ROZMUS, P. E.
JOHN McGUIRE, P. E. • JORGE MOLINA, ING. • WILLIAM J. CUNNINGHAM, P. E. • JOSEPH B. HELLMANN, P. E.

AMERICAN BANK NOTE COMPANY
BRONX, NEW YORK

CYANIDE STORAGE AREA
CLOSURE CERTIFICATION

PROJECT #524-1
JUNE 1986

EDER ASSOCIATES
CONSULTING ENGINEERS, P.C.
85 Forest Avenue
Locust Valley, New York 11560

SUMMARY OF ACTIVITIES

On March 29, 1985 American Bank Note Company (ABN) submitted a closure plan to the New York State Department of Environmental Conservation (DEC). Pursuant to the DEC request, a closure plan addendum was submitted April 29, 1985. DEC gave final approval of the closure plan on September 26, 1985.

The ABN cyanide storage pad is an outdoor 189 square feet (9'x21') concrete pad protected by a sheet steel shed roof and enclosed by a chain link locked fence. ABN was storing, under interim status, approximately three tons of cyanide contaminated waste (approximately 8% NaCN content). This material was a hard solid (slag) and was contained in closed steel drums. As part of the closure plan all the waste was removed to an off-site authorized treatment facility.

In accordance with the closure plan, the empty storage area was broom swept and mopped with water. The water from the mopping operation was collected (approximately 15 gallons) and tested for cyanide content. The results of this test yielded a cyanide concentration (CN^-) of less than 2 ppm or less than 4 ppm of sodium cyanide (NaCN). On February 8, 1985, the New York City Department of Environmental Protection (DEP) sent ABN a letter stating that the applicable sections in 40 CFR 413 must be met before discharge. 40 CFR 413.14(b) states that the PSES maximum 1-day discharge standard for a common metals facility discharging less than 38,000 liters per day is 5 ppm for amenable cyanide. As stated above, the wastewater generated from cleaning the storage area satisfied the 5 ppm standard.

As part of the ABN closure program, the concrete pad was wipe sampled after cleaning. The wipe samples were split with two independent laboratories for analysis.

The following table presents the results of the analyses:

Lab	CN/sf (mg/sf)	Total For 9'x21' Area CN (mg)	NaCN (mg)
A	0.55	104	196
B	0.51	96	182

NIOSH has reported that ingestion by humans of 50 to 100 mg of sodium cyanide (NaCN) may be fatal. Ingestion should not pose a hazard since it is implausible that a person could even purposely remove from the floor and ingest the 25 percent of the total amount present which might cause permanent harm. Dermal contact should not pose a risk since cyanide would have to be removed from the concrete and would have to adhere to an individual's skin before it could possibly penetrate the skin surface. This unlikely scenario indicates that residual cyanide should not present a health hazard from a dermal exposure route.

OSHA has set an airborne cyanide standard of 5 mg/m^3 averaged over an 8-hour work shift. Assuming, as a worst case scenario, that all the cyanide on the concrete pad was transmitted to the air to a height of 3 meters (height of roof) and that none of the air was circulated, the resulting cyanide concentration in the air would be 1.97 mg/m^3. This unlikely worst case occurrence would not violate the OSHA standard and indicates that the residual cyanide would not present a hazard from an atmospheric exposure route.

The enclosed certification indicates that the approved ABN closure plan for the cyanide storage area has been performed in accordance with the plan.

CERTIFICATION

Owner - Operator Certification

I, Anthony La Capria, of
owner or operator

American Bank Note Company, Tiffany St, Bronx
name and address of hazardous waste facility

hereby state and certify that, to the best of my knowledge and belief, that the Cyanide Storage Area of the above-named hazardous waste facility has been closed in accordance with the approved closure plan, and that the closure was completed on the 27th day of November, 1985.

Anthony La Capria
signature

May 27, 1986
date

Professional Engineer Closure Certification

I, Gary A. Rymer, a registered professional engineer, hereby certify that based on information supplied to me by an engineer working under my direction who examined the site, and on results of testing as described on this report, the ABN cyanide storage area has been closed in accordance with the approved closure plan addendum submitted April 29, 1985.

New York State Department of Environmental Conservation

MEMORANDUM

TO: Mr. John Middlekoop, Associate Sanitary Eng., Permit Section
FROM: Mr. Jerome J. Riordan, Ass't San. Eng., Region 2 S & H Unit
SUBJECT: American Bank Note Company - Garrison Avenue & Tiffany Street, Bronx, New York 10474 - (E.P.A.I.D. No. NYD091214718).
DATE: June 4, 1986

Enclosed is a Copy of Appendix L - Closure/Post Closure Inspection consisting (Pages L-1, L-2, L-3, L-4, and L-5). The Closure Inspection was requested by Michelle Taylor of the Permits Section and Region Two Solid Waste was requested to contact the American Bank Note Company and arrange a mutually agreeable date for this Closure Inspection conducted on May 8, 1986 at which Central Office personnel Michelle Taylor, Ass't. Sanitary Engineer, and John T. Spellman, Junior Engineer, Compliance Section were participants.

The Inspection revealed that the principal facility building had been sold and is currently in use by another concern, while the research building which also had been sold is currently in use as a rental site by American Bank Note Co., until December 31, 1986. Consequently complete closure of the total site has not been effected to date.

cc: file
S. Jagirdar
M. Taylor
J. Spellman

47-15-14(12/85)

REGION: TWO
Major:
Non-Major:

NEW YORK STATE INDUSTRIAL HAZARDOUS WASTE MANAGEMENT ACT

(Chapter 639, Laws of 1978)

Prepared for:

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
Henry G. Williams, Commissioner

Division of Solid and Hazardous Waste
Norman H. Nosenchuck, Director

(CLOSURE INSPECTION)

Send to: Compliance Inspection Section
50 Wolf Road - Room 207/415
Albany, New York 12233-0001

EPA I.D. NUMBER: NYD091214718

*HANDLER'S NAME (Corporate): AMERICAN BANK NOTE COMPANY
(Division):

*HANDLER'S MAILING ADDRESS: GARRISON AVENUE & TIFFANY STREET

City & State BRONX, New York, New York Zip Code 10474

*HANDLER'S LOCATION ADDRESS:
(if different than mailing)

City & State , Zip Code

*HANDLER'S TELEPHONE NUMBER: 212 542-9200 Extension

*FULL NAME OF HANDLER'S CONTACT: (Mr.) (Mrs.) DR. PAUL WYSZKOWSKI

*SIGNATURE OF HANDLER'S CONTACT:

(This signature is not an admittance to any violations cited herein. It merely acknowledges that an inspection took place.)

*TITLE OF HANDLER'S CONTACT: DIRECTOR, RESEARCH & PRODUCT DEVELOPMENT

INSPECTION DATE: TUESDAY, MAY 8, 1986 TIME OF INSPECTION: 10:45 a.m.
COUNTY: BRONX E/A NUMBER: 6 0 0 0 0 0

INSPECTOR'S NAME: (1) MS. MICHELLE TAYLOR, (2) JEROME J. RIORDAN, (3) JOHN T. SPELLMAN
TITLE: ASST. SAN. ENGINEER, ASST. SAN. ENGINEER, JUNIOR ENGINEER
NAME: PERMITS SECTION, REGION 2 - NEW YORK CITY, COMPLIANCE INSPECTION SECTION
TITLE: BUREAU OF HAZARDOUS WASTE TECHNOLOGY, CENTRAL OFFICE - ALBANY, BUREAU OF HAZARDOUS WASTE OPERATIONS, CENTRAL OFFICE - ALBANY

CHECK ONE: Copy of THIS report ( ) has (✓) has not) been given to the Handler.

REPORT PREPARED BY: JEROME J. RIORDAN DATE: MAY 10, 1986
REPORT APPROVED BY: DATE: 5/28/86

AMERICAN BANK NOTE COMPANY
E.P.A. I.D. No. NYD 091214718

Handler Name AMERICAN BANK NOTE COMPANY
EPA I.D. No. NYD091214718

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

APPENDIX L

Closure/Post Closure Inspection

1. For all facilities.

A. The owner or operator has closed the facility in a manner that:

(1) ___ Minimizes the need for further maintenance - 373-3.7(b)(1). — No Test Results Incomplete

(2) ___ Controls, minimizes or eliminates post-closure escape of hazardous waste, hazardous waste constituents, leachate, contaminated rainfall, or waste decomposition products to the groundwater, or surface waters, or to the atmosphere - 373-3.7(b)(2). — No Test Results Incomplete

B. ___ The owner or operator has completed closure in accordance with the approved closure plan - 373-3.7(d)(2) and — Yes (Form Hazardous Waste Location)

___ Within 180 days after receiving the final volume of waste - 373-3.7(d)(2). — X

C. ___ All facility equipment and structures have been properly disposed of, or decontaminated by removing all hazardous waste and residues - 373-3.7(e). — No Test Res. Incomplete

D. ___ The owner or operator has submitted, to the Commissioner, certification both by the owner or operator and by an independent, registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan - 373-3.7(f). — (Not Submitted To D.E.C.)

2. For Disposal Facilities Only.

A. ___ The owner or operator of a disposal facility has submitted his post-closure plan to the Commissioner at least 180 days before the date he expects to begin closure - 373-3.7(h)(3). — NA

4. What were you able to see at the facility?

(1) HAZARDOUS WASTE STORAGE AREA - THIS AREA WAS THE AREA THAT WAS LISTED IN THE CLOSURE PLAN THAT WAS SUBMITTED BY THIS FACILITY. THERE WAS NO EVIDENCE OF HAZARDOUS WASTE AT THIS LOCATION SINCE THERE WERE NO DRUMS OR CONTAINERS OF HAZARDOUS WASTE IN EVIDENCE DURING THIS CLOSURE INSPECTION VISIT. ACCORDING TO INFORMATION FROM CENTRAL OFFICE REPRESENTATIVE, MS. MICHELLE TAYLOR, WHO WAS PRESENT AT THIS SITE VISIT, TEST RESULTS HAVE NOT BEEN RECEIVED FROM CONSULT AND THUS THE CLOSURE CANNOT BE REGARDED AS COMPLETE. IN MARCH 29, 1985 LETTER FROM S.W. PAUL WYSZKOWSKI, DIRECTOR, RESEARCH & PRODUCT DEVELOPMENT SENT TO MR. JOHN L. MIDDELKOOP, P.E., SUPERVISOR, PERMITS SECTION - BUREAU OF HAZARDOUS WASTE TECHNOLOGY OF NYS DEC, MR. S.W. PAUL WYSZKOWSKI INFORMED DEC THAT AS OF FEBRUARY 10, 1984 THE STORAGE AREA HAD CONTAINED 26 DRUMS OF CONTAMINATED SLAG WAS CLOSED AND THE DRUMS OF CONTAMINATED SLAG HAD BEEN CARTED AWAY BY CHEMICAL WASTE DISPOSAL CORPORATION OF 4217 - 19TH AVENUE, ASTORIA, NEW YORK AFTER THE AREA HAD BEEN BROOM SWEPT AND THE SWEEPINGS COLLECTED IN A DRUM FOR DISPOSAL BY CHEMICAL WASTE DISPOSAL CORPORATION.

(2) AN INSPECTION WAS MADE OF THE 4TH FLOOR TO THE FORMER LOCATION OF THE CHROMIUM PLATING AREA. THIS AREA WAS NOT A HAZARDOUS WASTE STORAGE AREA LOCATION, BUT WAS AN OPERATIONAL PROCESS PLATING AREA HANDLING AND DEALING WITH HAZARDOUS TYPE MATERIALS IN DAILY OPERATIONS. IT WAS OBSERVED DURING THIS SITE VISIT THAT THERE WAS EVIDENCE OF RESIDUE IN THIS AREA AS A RESULT OF THE STRIPPING & STRIKE OPERATION (GREENISH COLORED RESIDUE APPARENT ON FLOOR). THERE WAS ALSO A BROWNISH COLOR STAIN OR RESIDUE ON THE FLOOR BY THE DRAIN WHICH PROBABLY MAY HAVE RESULTED FROM A BACKUP OF THE DRAIN. THIS MAY OR MAY NOT BE HAZARDOUS. HOWEVER, AS A RESULT OF THIS INSPECTION THIS AREA WILL HAVE TO BE CLEANED AND DECONTAMINATED.

AMERICAN BANK NOTE COMPANY
E.P.A. I.D. No. NYD 091214718

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

B. ___ Within 90 days after closure is completed, the owner or operator of a disposal facility has submitted to the County Clerk and to the Commissioner a survey plat indicating the location and dimensions of landfill cells or other disposal areas with respect to permanently surveyed benchmarks - 373-3.7(i). NA

C. ___ The owner or operator has submitted to the Commissioner and to the County Clerk a record of the type, location and quantity of hazardous wastes disposed of within each cell or area of the facility - 373-3.7(i). NA

D. ___ The owner of the property on which a disposal facility is located has recorded a notation on the deed to the facility property - or on some other instrument which is normally examined during title search - that will inperpetuity notify any potential purchaser of the property that: (1) the land has been used to manage hazardous waste, and (2) its use is restricted under paragraph 373-3.7(g)(3). 373-3.7(j). NA

3. If access to the facility is not possible, what has been done to try and contact the company? Be explicit and give names, addresses and telephone numbers.

Not Applicable

4. What were you able to see at the facility? (CONTINUED).

(B) In the Vicinity of the Garage Area where the Gasoline Pump was Located, it was observed that there was evidence that oil had been deposited on the ground which had soaked in and the soil had appearance characteristic of soil that oil residues soaked into the soil structure. According to Mr. Paul Wyszkowski, this could be machine oil with metal cuttings and fine colloidal metallic particles that had been collected in this oil during machine operations. This area in addition to the above areas will be required to be cleaned up and this was pointed out to the American Bank Note Company mentioned in this report.

(C) At the conclusion of this inspection of site for closure we returned to the Research Building at 1241 Tiffany Street and discussed the observations and conclusions and recommendations as a result of this facility closure site inspection visit.

(D) During the discussion it was learned that the manufacturing facility that was now closed had been sold November 22, 1985 and that the research facility also had been sold but leased back to American Bank Note Company who would have to vacate the research building by December 31, 1986. The research facility is in use for its printing room until the new facility in Rockland County currently built comes into full operational capacity. The closure site inspection terminated at 12:30 p.m. Besides Ms. Michele Taylor of Permits Section, of Bureau of Hazardous Waste Technology, John T. Spellman, Junior Engineer of Compliance Inspection Section of Bureau of Hazardous Waste Operations from Central Office was also present. The facility site closure inspection had been arranged by the Region 2 Office of DEC at the request of L-3 the Permits Section, Bureau of Hazardous Waste Technology and [illegible] Michele Taylor) of the Central Office [illegible]

American Bank Note Company
E.P.A. I.D. No. NYD091314718

Page L-4

4. What were you able to see at the facility? (continued)

And it was pointed out to Mr. S.W. Paul Wyszkowski and Mr. John Volpe of American Bank Note Company.

(3) Also on the Fourth Floor, the Location Area where Photographic Activities were conducted involving Resin Coating of Printing Plates and Photosensitizing Operations were conducted was visited. It was observed that an area of one portion of the wall had a black color residue adhering to the wall which may have been residue of gelatin base coating and may possibly be hazardous. This area was pointed out to the American Bank Note. People would have to be cleaned, and evidence of the residue removed.

(4) The former Cyanide Heating Treating Area located on the Fourth Floor was also inspected during this site visit, and there was no evidence of drums of spent sodium cyanide carbon waste, and it was observed that the area had been cleaned and a new floor put in at this location, and the area exhibited no evidence of residue, which included the walls.

Summary (A) The Hazardous Waste Storage Area and Cyanide Heat Treating Area appear to be satisfactory since no hazardous waste and no evidence of hazardous waste was noted during the site visit.

(B) The Chrome Plating Area and the former Photographic Area involving (Ag) Silver Sensitizing of Printing Plates did show evidence of residues from past operations although no evidence of drums of hazardous waste or hazardous materials was found. These areas will have to be cleaned and residues of hazardous waste removed. This was pointed out to Mr. Paul Wyszkowski and Mr. John Volpe.

New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233-0001

Henry G. Williams
Commissioner

JUN 26 1986

Mr. S.W. Paul Wyszkowski
Director, Research & Product Development
American Bank Note Company
Garrison Avenue & Tiffany Street
Bronx, New York 10474

Dear Mr. Wyszkowski:

Re: Bronx, New York Facility
EPA I.D. No. NYD091214718

This confirms receipt by this office of Owner/Operator and Engineering Certification for closure of the referenced facility. Upon review of our records, it is deemed that all applicable regulatory requirements in conjunction with closure of the RCRA-permitted portions of the referenced facility have been met.

In order to terminate the facility's interim status, an official formal request to deny the Part B Permit for the subject facility should be made, in writing, to the U.S. Environmental Protection Agency (USEPA). Upon receipt of this request, the USEPA will then publish a Notice of Intent to deny the RCRA Part B application for your facility. Following the required comment period for this notice, you will be notified by the USEPA insofar as termination of your facility's interim status. Please note that this step is legally required in order to have the facility's interim status withdrawn.

The aforementioned request should be forwarded, within 30 days from the date of this letter to:

Mr. Richard A. Baker
Chief
Permits Administration Branch
U.S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, NY 10278

with copies to:

Mr. Stanley Siegel
Chief
Compliance and Enforcement Section
U.S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, NY 10278

Mr. John L. Middelkoop, P.E.
Supervisor
Permit Section
Division of Solid and Hazardous Waste
Room 401
New York State Department of
Environmental Conservation
50 Wolf Road
Albany, NY 12233

Mr. Sudhir Jagirdar
Regional Hazardous Waste Engineer
New York State Department of
Environmental Conservation
2 World Trade Center
33rd Floor
New York, NY 10047

Please note that this approval in no way precludes your responsibility to ensure that hazardous wastes or residues not associated with the hazardous waste container storage area are removed. Region 2 will be in contact if additional testing is required.

If you should have any questions or comments regarding the above, please contact Ms. Michelle Taylor at (518) 457-3274.

Sincerely

Randy S. McDermott, P.E.
Senior Sanitary Engineer
Permit Section
Bureau of Hazardous Waste Technology
Division of Solid and Hazardous Waste

cc: R. Baker, USEPA Region II
S. Siegel, USEPA Region II
J. Middelkoop
S. Jagirdar, Region 2

American Bank Note Company
1241 Lafayette Avenue
Bronx, N.Y. 10474

July 25, 1986

Mr. Richard A. Baker
Chief
Permits Administration Branch
U. S. Environmental Protection
Agency
Region II
26 Federal Plaza
New York, New York 10278

Dear Mr. Baker:

This letter constitutes a formal request to deny the Part B Permit for the hazardous waste storage facility which we had been operating under the interim status and which now has been closed and the Engineering Certification for the closure has been accepted by the New York State Department of Environmental Conservation.

A copy of the NYSDEC letter of acceptance of the Engineering Certification is attached.

Sincerely,

S.W. Paul Wyszkowski

S.W. Paul Wyszkowski
Senior Director of
Research

/lv

attachment

Mr. Richard A. Baker

copies to: Mr. Stanley Siegel
Chief
Compliance and Enforcement Section
U.S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, N. Y. 10278

Mr. John L. Middelkoop, P.E.
Supervisor
Permit Section
Division of Solid and Hazardous Waste
Room 401
New York State Department of Environmental Conservation
50 Wolf Road
Albany, N. Y. 12233

Mr. Sudhir Jagirdar
Regional Hazardous Waste Engineer
New York State Department of Environmental Conservation
2 World Trade Center
33rd Floor
New York, N. Y. 10047

APPENDIX B

PRELIMINARY REVIEW CHECKLIST

PRELIMINARY RCRA FACILTY ASSESSMENT

PRELIMINARY REVIEW CHECKLIST

WORK ASSIGNMENT NO. R02040

FACILITY: American Bank Note
Tiffany St. and Garrison Ave.
Bronx, NY

EPA ID #: NYD0912147 18

FACILITY CONTACT: ( )

KEY

P	PROVIDED
NP	NOT PROVIDED
A	ACCEPTABLE
NA	NOT ACCEPTABLE
Y	YES
N	NO
OR	OBSERVED RELEASE (DIRECT EVIDENCE)
SR	SUSPECTED RELEASE (INDIRECT EVIDENCE)
PoR	POTENTIAL RELEASE (POSSIBLE FOR A RELEASE TO OCCUR)
NR	NO RELEASE HAS OCCURRED (DIRECT EVIDENCE)
SWMU	SOLID WASTE MANAGEMENT UNIT
AOC	AREA OF CONCERN

RFA COMPONENT 1: PRELIMINARY REVIEW (PR)

A. General Manufacturing process description: ✓ P ___ NP ✓ A ___ NA

Comments: Manufacturer of foreign currency, travelers checks, securities, and other forms of monetary instruments.

B. General Facility waste generation description: ✓ P ___ NP ✓ A ___ NA

Comments: Cyanide wastes and sludges generated during hardening and treating processes, and ink manufacturing.

C. Environmental/hydrogeologic setting description: ___ P ✓ NP ___ A ___ NA

Comments:

D. SWMU identification list: ✓ P ___ NP ___ A ___ NA

Comments: 5 SWMUs were identified.

E. Was the SWMU subset of RCRA regulated units denoted? ___ Y ✓ N ___ A ___ NA

Comments:

F. Were other AOC's (e.g. spills, leaks) listed? ___ Y ✓ N ___ A ___ NA

Comments:

G. Were potential off-site exposure pathways identified? (e.g. drinking water wells, irrigated farmland, swamps) ___ Y ✓ N ___ A ___ NA

Comments:

H. Detailed SWMU and AOC information:

SWMU # 1 or AOC Former waste sodium cyanide drum storage area

1. Is unit located on a facility map? __Y ✓N __A __NA

Comments: Located in the interior court of the main building

2. Unit characteristics (e.g. design, liners, age, construction):
✓P __NP ✓A __NA

Comments: 9'x21' concrete pad with chain-linked fence and a sheet metal roof.

3. Waste characteristics (e.g. types, volumes, classification):
✓P __NP ✓A __NA

Comments: Waste sodium cyanid (NaCN) stored in 1D and 55 gallon drums. The quantity was not specified.

4. Waste Migration pathways:

a. Air: __CR __SR __PoR ✓NR

i. Is documentation provided? ✓Y __N

ii. Does the documentation provide acceptable support for the determination (CR, SR, PoR, NR)? ✓Y __N

Comments: Drum storage area. Covered location. The potential for a significant release is negligible.

b. Soil: ✓CR __SR __PoR __NR

i. Is documentation provided? ✓Y __N

ii. Does the documentation provide acceptable support for the determination (CR, SR, PoR, NR)? ✓Y __N

Comments: Dark staining observed on rocks, soil, and broken concrete.

c. Ground Water: __CR __SR ✓PoR __NR

i. Is documentation provided? ✓Y __N

ii. Does the documentation provide acceptable support for the determination (CR, SR, PoR, NR)? __Y ✓N

Comments: Refer to 4b. The environmental setting is not known.

d. Surface Water: __CR __SR ✓PoR __NR

i. Is documentation provided? ✓Y __N

ii. Does the documentation provide acceptable support for the determination (CR, SR, PoR, NR)? ✓Y __N

Comments: It is not known if drains exist near this location.

e. Subsurface gas: __CR __SR ✓PoR __NR

i. Is documentation provided? ✓Y __N

ii. Does the documentation provide acceptable support for the determination (CR, SR, PoR, NR)? ✓Y __N

Comments: NaCN has the potential to produce HCN gas. Refer to 4b.

5. Conclusions/ Recommendations:

a. ___ No conclusion or recommendation provided.

___ Recommended no further action.

___ Recommended a sampling visit.

i. Was sampling performed as part of this RFA? __Y __N

ii. Will the sampling be conducted in an RFI? __Y __N

___ Recommended interim measures.

___ Recommended an RFI.

Comments: Recommend a VSI.

b. Is the recommendation acceptable? ✓Y __N

Comments: No evidence to conclude that a subsurface investigation has taken place. Quantities of CN detected on the concrete. The concrete was broken and soil and rock was exposed. Officially closed in 1985.

H. Detailed SWMU and AOC information:

SWMU # 2 or AOC Cyanide heat treatment plate hardening area

1. Is unit located on a facility map? __Y ✓N __A __NA

Comments: Located on the fourth floor of the main building complex. Concrete floor. Exact location unknown.

2. Unit characteristics (e.g. design, liners, age, construction):
__P ✓NP __A __NA

Comments:

3. Waste characteristics (e.g. types, volumes, classification):
✓P __NP __A ✓NA

Comments: Cyanide wastes

4. Waste Migration pathways:

a. Air: __CR __SR ✓PoR __NR

i. Is documentation provided? __Y ✓N

ii. Does the documentation provide acceptable support for the determination (CR, SR, PoR, NR)? __Y __N

Comments: The potential for HCN gas exists. Details of this area are not provided in the files.

b. Soil: __CR __SR __PoR ✓NR

i. Is documentation provided? ✓Y __N

ii. Does the documentation provide acceptable support for the determination (CR, SR, PoR, NR)? ✓Y __N

Comments: Located on the 4th floor. Release potential is negligible.

c. Ground Water: __CR __SR __PoR ✓NR

i. Is documentation provided? ✓Y __N

ii. Does the documentation provide acceptable support for the determination (CR, SR, PoR, NR)? ✓Y __N

Comments: See 4b.

d. Surface Water: __CR __SR ✓PoR __NR

i. Is documentation provided? ✓Y __N

ii. Does the documentation provide acceptable support for the determination (CR, SR, PoR, NR)? __Y ✓N

Comments: The drainage system was not described in the files reviewed. Dark staining was observed on the concrete.

e. Subsurface gas: __CR __SR __PoR ✓NR

i. Is documentation provided? ✓Y __N

ii. Does the documentation provide acceptable support for the determination (CR, SR, PoR, NR)? ✓Y __N

Comments: See 4b.

5. Conclusions/ Recommendations:

a. ✓ No conclusion or recommendation provided.

___ Recommended no further action.

___ Recommended a sampling visit.

i. Was sampling performed as part of this RFA? __Y __N

ii. Will the sampling be conducted in an RFI? __Y __N

___ Recommended interim measures.

___ Recommended an RFI.

Comments: Recommend investigating the plumbing layout.

b. Is the recommendation acceptable? ✓Y __N

Comments:

H. Detailed SWMU and AOC information:

SWMU # 3 or AOC Former Chrome plating area

1. Is unit located on a facility map? __Y ✓N __A __NA

Comments:

2. Unit characteristics (e.g. design, liners, age, construction):
✓P __NP __A ✓NA

Comments: Interior of the building complex. Concrete floors

3. Waste characteristics (e.g. types, volumes, classification):
✓P __NP __A ✓NA

Comments: Chromium containing waste.

4. Waste Migration pathways:

a. Air: __CR ✓SR __PoR __NR

i. Is documentation provided? ✓Y __N

ii. Does the documentation provide acceptable support for the determination (CR, SR, PoR, NR)? __Y ✓N

Comments: Pipes and light fixtures rusted on the ceiling. Acidic gases were likely released. (CDM, 1990)

b. Soil: __CR __SR ✓PoR __NR

i. Is documentation provided? ✓Y __N

ii. Does the documentation provide acceptable support for the determination (CR, SR, PoR, NR)? __Y ✓N

Comments: Interior location & concrete floor, however, structural conditions and location of this area not documented in the files.

c. Ground Water: __CR __SR ✓PoR __NR

i. Is documentation provided? ✓Y __N

ii. Does the documentation provide acceptable support for the determination (CR, SR, PoR, NR)? __Y ✓N

Comments: Environmental setting not known. Refer to 4b.

d. Surface Water: __CR __SR ✓PoR __NR

i. Is documentation provided? ✓Y __N

ii. Does the documentation provide acceptable support for the determination (CR, SR, PoR, NR)? __Y ✓N

Comments: Details of the plumming not known. Refer to 4b.

e. Subsurface gas: __CR __SR ✓PoR __NR

i. Is documentation provided? ✓Y __N

ii. Does the documentation provide acceptable support for the determination (CR, SR, PoR, NR)? __Y ✓N

Comments: Based on 4a, gases are emmitted. Refer to 4b.

5. Conclusions/ Recommendations:

a. ✓ No conclusion or recommendation provided.

__ Recommended no further action.

__ Recommended a sampling visit.

i. Was sampling performed as part of this RFA? __Y __N

ii. Will the sampling be conducted in an RFI? __Y __N

__ Recommended interim measures.

__ Recommended an RFI.

Comments: Recommend a VSI

b. Is the recommendation acceptable? ✓Y __N

Comments: Officially closed in 1985.

H. Detailed SWMU and AOC information:

SWMU # 4 or AOC Former Photographic Silver Sensitizing Area.

1. Is unit located on a facility map? __Y ✓N __A __NA

Comments: Interior of building. Versar was unable to identify the location in 1989 because the layout of the facility was changed.

2. Unit characteristics (e.g. design, liners, age, construction):
__P ✓NP __A __NA

Comments:

3. Waste characteristics (e.g. types, volumes, classification):
__P ✓NP __A __NA

Comments:

4. Waste Migration pathways:

a. Air: __OR __SR ✓PoR __NR

i. Is documentation provided? __Y ✓N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? __Y __N

Comments: insufficient information

b. Soil: __OR __SR ✓PoR __NR

i. Is documentation provided? __Y ✓N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? __Y __N

Comments: insufficient information

c. Ground Water: __OR __SR ✓PoR __NR

i. Is documentation provided? __Y ✓N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? __Y __N

Comments: insufficient information

d. Surface Water: __CR __SR ✓PoR __NR

i. Is documentation provided? __Y ✓N

ii. Does the documentation provide acceptable support for the determination (CR, SR, PoR, NR)? __Y __N

Comments: Insufficient information

e. Subsurface gas: __CR __SR ✓PoR __NR

i. Is documentation provided? __Y ✓N

ii. Does the documentation provide acceptable support for the determination (CR, SR, PoR, NR)? __Y __N

Comments: Insufficient information

5. Conclusions/ Recommendations:

a. ✓ No conclusion or recommendation provided.

___ Recommended no further action.

___ Recommended a sampling visit.

i. Was sampling performed as part of this RFA? __Y __N

ii. Will the sampling be conducted in an RFI? __Y __N

___ Recommended interim measures.

___ Recommended an RFI.

Comments: Recommend reviewing the former layout of the facility at city Hall to document the structure at this location.

b. Is the recommendation acceptable? ✓Y __N

Comments: The location is not known and may have been altered. A VSI would be useless.

H. Detailed SWMU and AOC information:

SWMU # 5 or AOC Gasoline pump

1. Is unit located on a facility map? __Y ✓N __A __NA

Comments: Garage area adjacent to the main building complex.

2. Unit characteristics (e.g. design, liners, age, construction):
__P ✓NP __A __NA

Comments: Suspect a UST is at this location.

3. Waste characteristics (e.g. types, volumes, classification):
__P ✓NP ✓A __NA

Comments: Gasoline and other petrolium products assumably.

4. Waste Migration pathways:

a. Air: __OR __SR __PoR ✓NR

i. Is documentation provided? __Y ✓N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? __Y __N

Comments: Whether an AST or UST, the potential for a significant release is negligible.

b. Soil: ✓OR __SR __PoR __NR

i. Is documentation provided? ✓Y __N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ✓Y __N

Comments: Oil staining on the ground and soil was observed.

c. Ground Water: __OR __SR ✓PoR __NR

i. Is documentation provided? ✓Y __N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? __Y ✓N

Comments: Refer to 4b. The environmental setting is not known.

d. Surface Water: __CR __SR ✓PoR __NR

i. Is documentation provided? __Y ✓N

ii. Does the documentation provide acceptable support for the determination (CR, SR, PoR, NR)? __Y __N

Comments: It is not known if drums exist at this location.

e. Subsurface gas: __CR __SR ✓PoR __NR

i. Is documentation provided? ✓Y __N

ii. Does the documentation provide acceptable support for the determination (CR, SR, PoR, NR)? ✓Y __N

Comments: Refer to 4b. Gasoline is volatile.

5. Conclusions/ Recommendations:

a. ✓ No conclusion or recommendation provided.

___ Recommended no further action.

___ Recommended a sampling visit.

i. Was sampling performed as part of this RFA? __Y __N

ii. Will the sampling be conducted in an RFI? __Y __N

___ Recommended interim measures.

___ Recommended an RFI.

Comments: Recommend a RSI

b. Is the recommendation acceptable? ✓Y __N

Comments: No evidence indicating that subsurface investigation or remediation has occurred.

I. Did the PR identify any data gaps? ✓ Y ___ N ___ A ___ NA

a. If "Y", list the data gaps: air permit details, discharge permit details, AOC locations, a general plumbing scheme, the environmental setting.

Comments: _____

J. Other comments on the PR: _____

Facility was sold in 1985.

Audited Consolidated Financial Statements

American Bank Note Company and Subsidiary Companies

December 26, 1982

Ernst & Whinney

AUDITED CONSOLIDATED FINANCIAL STATEMENTS

AMERICAN BANK NOTE COMPANY
AND SUBSIDIARY COMPANIES

DECEMBER 26, 1982

Audited Consolidated Financial Statements

AMERICAN BANK NOTE COMPANY AND SUBSIDIARY COMPANIES

December 26, 1982

Ernst & Whinney

153 East 53rd Street
New York, New York 10022

212/888-9100

Board of Directors
American Bank Note Company
New York, New York

We have examined the consolidated balance sheet of American Bank Note Company (a wholly owned subsidiary of International Banknote Company, Inc.) and subsidiary companies as of December 26, 1982 and December 27, 1981, and the related consolidated statements of operations and retained earnings and changes in financial position for the fiscal years then ended. Our examinations were made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

In our opinion, the financial statements referred to above present fairly the consolidated financial position of American Bank Note Company and subsidiary companies at December 26, 1982 and December 27, 1981, and the consolidated results of their operations and changes in their financial position for the fiscal years then ended, in conformity with generally accepted accounting principles applied on a consistent basis.

Ernst & Whinney

New York, New York
March 2, 1983

AMERICAN BANK NOTE COMPANY AND S

CONSOLIDATED BALANCE SHEET

	December 26, 1982	December 27, 1981
	(In Thousands)	
ASSETS		
CURRENT ASSETS		
Cash	$ 1,835	$ 92
Temporary cash investments	12,399	17,037
Trade and other receivables	15,329	11,018
Inventories, at lower of avera	1,359	1,831
cost or estimated market:		2,339
Work in process	8,655	13,433
Semi-finished stock	680	692
Raw materials and supplies ABILITIES	40,257	46,442
Tota		
Deferred income taxes	12,251	8,773
Prepaid expenses		
TOTA		
	9,263	15,859
	2,582	2,099
PROPERTY, PLANT AND EQUIPMENT	11,845	17,958
Land		
Buildings, less allowances for depreciation ($5,997 and $5,	2,901	3,676
Machinery and equipment, less depreciation ($26,348 and $2authorized,		
Dies and rolls	1	1
Capitalized leased property-le for amortization	7,602	7,602
	47,107	51,389
	54,710	58,992
ents	(8,340)	(4,317)
INTANGIBLE AND SUNDRY ASSETS	46,370	54,675
	$113,624	$131,524

ements

AMERICAN BANK NOTE COMPANY AND SUBSIDIARY COMPANIES

CONSOLIDATED STATEMENTS OF OPERATIONS AND RETAINED EARNINGS

For Fiscal Years

	1982	1981
	(In Thousands)	
REVENUES		
Sales	$147,524	$177,303
Interest income	498	534
	148,022	177,837
COSTS AND EXPENSES		
Cost of goods sold	129,214	131,875
Selling and administrative	21,434	23,272
Interest expense	2,575	2,557
Foreign exchange adjustments	(424)	(751)
Restructuring costs--Note C	4,376	-
	157,175	156,953
INCOME (LOSS) BEFORE INCOME TAXES	(9,153)	20,884
INCOME TAXES (CREDITS)	(6,231)	9,103
NET INCOME (LOSS)	$ (2,922)	$ 11,781
RETAINED EARNINGS		
Balance at beginning of year	$ 51,389	$ 40,968
Net income (loss) for year	(2,922)	11,781
Dividends	(1,360)	(1,360)
BALANCE AT END OF YEAR	$ 47,107	$ 51,389

See notes to consolidated financial statements

AMERICAN BANK NOTE COMPANY AND SUBSIDIARY COMPANIES

CONSOLIDATED STATEMENT OF CHANGES IN FINANCIAL POSITION

For Fiscal Years

	1982	1981
	(In Thousands)	
SOURCES OF WORKING CAPITAL FROM OPERATIONS:		
Net income (loss)	$ (2,922)	$ 11,781
Items not affecting working capital:		
Depreciation and capital lease amortization	5,806	4,721
Amortization of intangibles	77	80
Deferred income taxes - noncurrent	(4,109)	4,135
Sundry-net	389	459
WORKING CAPITAL PROVIDED FROM (USED IN) OPERATIONS	(759)	21,176
Increase in long-term debt	12,355	5,813
Disposals of equipment	373	301
Sundry-net	36	505
TOTAL SOURCES OF WORKING CAPITAL	12,005	27,795
USES OF WORKING CAPITAL		
Dividends	1,360	1,360
Additions to property, plant and equipment	8,715	14,272
Payments and transfers of current portion of long-term debt and capital lease obligations	8,603	9,239
Effect of translation adjustment	2,112	3,496
Sundry	18	
TOTAL USES OF WORKING CAPITAL	20,808	28,367
DECREASE IN WORKING CAPITAL	$ (8,803)	$ (572)
CHANGES IN COMPONENTS OF WORKING CAPITAL		
Increase (decrease) in current assets:		
Cash and temporary cash investments	$ (3,923)	$ 3,954
Trade and other receivables	(9,920)	(7,194)
Inventories	(2,053)	(4,619)
Deferred income taxes	945	(751)
Prepaid expenses	(37)	(254)
DECREASE IN CURRENT ASSETS	(14,988)	(8,864)
Increase (decrease) in current liabilities:		
Short-term loans	1,743	(8,938)
Accounts payable and accrued expenses	(327)	(4,370)
Income taxes	(472)	683
Payable to affiliates	(2,339)	797
Customers' advances	(4,778)	3,533
Current portion of long-term debt	(12)	3
DECREASE IN CURRENT LIABILITIES	(6,185)	(8,292)
DECREASE IN WORKING CAPITAL	$ (8,803)	$ (572)

See notes to consolidated financial statements

AMERICAN BANK NOTE COMPANY AND SUBSIDIARY COMPANIES

NOTES TO CONSOLIDATED FINANCIAL STATEMENTS

NOTE A--SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Principles of Consolidation: The consolidated financial statements include the accounts of the Company and its subsidiaries. All significant intercompany items have been eliminated. The Company follows the 52/53 week method in determining its fiscal year and is a wholly owned subsidiary of International Banknote Company, Inc. ("Parent"). The Parent contributed to the Company, in 1981, the capital stock of a subsidiary valued at $250,000.

Profit Recognition on Long-Term Contracts: Contracts with certain customers for the printing of security documents over a period longer than one year are on either a fixed price or price escalation basis. Profits on such sales are recognized proportionately as these documents are delivered.

Property and Depreciation: Land, buildings and equipment, as well as improvements which appreciably extend the useful lives of such assets, are carried at cost. Depreciation is provided over the estimated useful lives of the depreciable assets by the use of the straight-line and certain accelerated methods. Costs of additions to dies and rolls are charged to expense as incurred.

Other Accounting Policies: Research and development costs are expensed as incurred (1982--$1,811,000; 1981--$1,267,000). The Company and its subsidiaries fund their pension plans on a current basis.

NOTE B--FOREIGN CURRENCY TRANSLATION AND FOREIGN OPERATIONS

Gains and losses resulting from translation are reflected as a separate component of shareholder's equity. The separate component of shareholders' equity of cumulative foreign translation adjustments changed as follows:

	1982	1981
	(In Thousands)	
Balance - beginning of year	$(4,317)	$ 1,683
Annual translation adjustment	(4,023)	(6,000)
Balance - end of year	$(8,340)	$(4,317)

Net income (loss) of foreign subsidiaries amounted to ($1,095,000) in 1982 and $7,050,000 in 1981. Total assets applicable to these subsidiaries were $66,167,000 at December 26, 1982 and $83,880,000 at December 27, 1981. Total liabilities applicable to these subsidaries were $46,904,000 at December 26, 1982 and $57,173,000 at December 27, 1981.

NOTE C--RESTRUCTURING COSTS

Restructuring costs result from a one-time charge for organizational restructuring and employee terminations principally in the United Kingdom, incurred in order to reduce costs.

NOTE D--DEBT

	1982	1981
	(In Thousands)	
Short-term debt (a)	$ 1,835	$ 92
Current portion of long-term debt	$ 680	$ 692
Long-term debt:		
Bank loans payable in various amounts through 1986 (b)	$ 2,207	$ 3,367
9-3/4% to 12-1/2% mortgage notes payable through 1999	928	974
Payable to parent company (c)	9,522	4,806
Other	274	318
	12,931	9,465
Less current portion	680	692
	$ 12,251	$ 8,773
Total debt	$ 14,766	$ 9,557

(a)--The Company's foreign subsidiaries have arrangements with certain banks whereby they may borrow up to $21,000,000, subject to restrictions imposed by the Parent's bank loan agreement.

(b)--Bank loans consist principally of borrowings by a foreign subsidiary of $2,098,000 at December 26, 1982 ($3,038,000 at December 27, 1981) at an 11% rate of interest. The loan agreement provides for a restriction on the payment of dividends in excess of 50% of the subsidiary's net income.

(c)--The amount payable to the Parent, unless it is extended, matures in 18 months and bears interest at the prime rate.

NOTE D--DEBT--CONTINUED

Long-term debt at December 26, 1982, other than that payable to the parent company, matures as follows: 1983--$680,000; 1984--$729,000; 1985--$780,000; 1986--$361,000; 1987--$16,000; and thereafter--$843,000.

NOTE E--INCOME TAXES

The provision for income taxes (credits) is based on income reported for financial statement purposes. The amounts by which such provision differs from taxes currently payable result from timing differences in the recognition of certain items, principally depreciation expense, restructuring costs and operating losses. The tax effects related to these differences are deferred to future years.

In accordance with a tax allocation agreement, the Company is included in the consolidated U.S. income tax returns of its Parent and makes payments to its Parent based, in general, on the amount which would be payable as U.S. income taxes if consolidated returns were not filed.

Investment credits are reflected as a reduction of income tax expense on the flow-through method in the year in which the related assets are placed in service (1982--$323,000; 1981--$79,000).

The provision for income taxes (credits) is comprised as follows:

	1982	1981
	(In Thousands)	
Current:		
Federal	$ (667)	$ 2,731
Foreign	(558)	886
State and local	48	600
	(1,177)	4,217
Deferred:		
Federal	(1,551)	986
Foreign	(3,503)	3,900
	(5,054)	4,886
	$ (6,231)	$ 9,103

NOTE E--INCOME TAXES--CONTINUED

The effective tax rate varied from the U.S. statutory tax rate principally because of investment and foreign export tax credits, stock relief benefits, higher effective foreign tax rates, inclusion of state and local taxes, and in 1982, the utilization of a net operating loss carryforward of a foreign subsidiary of $494,000.

At December 26, 1982, there were cumulative undistributed earnings of foreign subsidiaries of approximately $21,150,000 on which no deferred income taxes have been provided since it is intended that the subsidiaries will either reinvest these earnings or foreign tax credits and other provisions will be available to offset any U.S. income taxes due.

NOTE F--COMMITMENTS AND CONTINGENCIES

Capital Assets: The Company and a foreign subsidiary have firm commitments amounting to approximately $5,752,000 for the acquisition of equipment.

Leases: The Company's operating leases for buildings expire at various dates through 2006 and have aggregate future rentals of $26,942,000 (approximately $1,568,000 per annum for the next five years). The Company's operating leases for equipment expire at various dates through 1992 and have aggregate future rentals of $12,257,000 (approximately $1,664,000 per annum for the next five years). Total rental expense was $4,077,000 for 1982 and $3,007,000 for 1981, which included $471,000 for 1982 and $79,000 for 1981 paid to an affiliated company.

The Company has capital leases for a printing facility and certain equipment. At December 26, 1982, the minimum payments for these capital leases were as follows (in thousands):

1983	$ 841
1984	473
1985	473
1986	473
1987	473
1988 and thereafter	6,862
Total minimum lease payments	9,595
Less amount representing interest	6,315
Present value of net minimum lease payments	3,280
Less obligations due within one year	379
Long-term capital lease obligations	$ 2,901

NOTE F--COMMITMENTS AND CONTINGENCIES--CONTINUED

Pension Plans: The Company and its subsidiaries have formal trusteed pension plans which cover substantially all employees except those included under separate union plans and which, in the case of the subsidiaries, are contributory. The annual provision for pension costs (1982--$4,584,000; 1981--$5,103,000) includes current costs and amortization of prior service costs over forty years.

Accumulated plan benefit information, as estimated by consulting actuaries, and plan net assets were as follows at January 1:

	1982	1981
	(In Thousands)	
Actuarial present value of accumulated plan benefits		
Vested	$ 34,305	$ 33,622
Nonvested	963	808
	$ 35,268	$ 34,430
Net assets available for benefits	$ 43,096	$ 44,918

The average rate of return assumed in determining the actuarial present value of accumulated plan benefits was approximately 7.5%.

Several claims are pending against the Company; however, in the opinion of management the ultimate liability, if any, will not have a material adverse effect on the Company's financial position.