EMERALD SERVICES INC

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DEC 06 2011
Office of Air, Waste & Toxics

December 5, 2011

EPA Region 10
Solid Waste and Toxics Unit
1200 Sixth Ave, Suite 900
Seattle WA 98101
Attn: Michele Wright

RE: Unmanifested Waste Report – Wurdinger Recycling
Emerald Services, Inc., 251 Commercial Ave., Pasco WA 99301

Dear Ms. Wright;

The Emerald Services, Inc. facility located at 251 Commercial Ave., Pasco WA 99301 (Emerald) recently received a shipment of PCB-contaminated oil from Wurdinger Recycling, 10300 McAlister Rd., Island City, Oregon 97850. The following information is being provided per the requirements for an unmanifested waste report under 40 CFR Part 761.211.

1) EPA Identification Number, Name and Address of the PCB Commercial Storage or Disposal Facility:

Temporary Storage: Emerald Services, Inc.
251 Commercial Ave.
Pasco WA
WAH000023002

TSDF: Clean Harbors (Aragonite), LLC
11600 N. Aptus Rd, Exit 56
Aragonite UT 84029
UTD 981 552 177

2) Date the commercial storage or disposal facility received the unmanifested PCB waste:

Unmanifested PCB waste was initially received on November 7, 2011 at Emerald. Internal laboratory screening results received on November 23, 2011 indicated the waste was regulated under TSCA. Third party laboratory data reports were received on November 28, 2011 and confirmed that the waste was regulated under TSCA.

3) The EPA Identification Number, Name, and Address of the Generator and Transporter:

Generator: Wurdinger Recycling
10300 McAlister Rd.
Island City OR 97850
EPA ID#: None

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3) The EPA Identification Number, Name, and Address of the Generator and Transporter:

Generator: Wurdinger Recycling
10300 McAlister Rd.
Island City OR 97850
EPA ID#: None

Transporter: Emerald Services, Inc.
7343 East Marginal Way S.
Seattle WA 98108
WAD 058 364 647

4) A description of the Type and Quantity of the Unmanifested PCB Waste Received at the Facility:

   400 gallons of PCB-contaminated used oil contributing to contamination of approximately 23,000 gallons of used oil at the Emerald facility.

5) A Brief Explanation of Why the Waste was Unmanifested:

   The generator was unaware that the used oil was contaminated with PCBs.

6) The Disposition Made of the Unmanifested Waste by the Commercial Storage or Disposal Facility:

   The unmanifested waste is being temporarily stored in two tanks at the Emerald Services, Inc. facility located in Pasco until appropriate disposal arrangements can be made. All shipments coordinated by Emerald will be accompanied by a Uniform Hazardous Waste Manifest.

Emerald will provide a complete report regarding this issue to EPA once all documents pertaining to the issue have been received. The report will include PCB data, demonstration of on-site decontamination of tanks, and copies of manifests and certificates of disposal from the TSDF (Clean Harbors). If you have any questions in the meantime, please feel free to contact me at the numbers below.

Sincerely,

Sheila Smith, Environmental Coordinator
Emerald Services, Inc.
(206) 832-3204 (Office)
(253) 370-7912 (Cell)
(206) 832-3304 (fax)
sheilas@emeraldnw.com

cc: Facility Operating Record
Wurdinger Recycling