ALCO

Alco Power Inc.

100 Orchard Street, Auburn, N.Y. U.S.A. 13021
315/253-3241, Telex 937-300, Cable ALCO AUBURN

June 28, 1984

Mr. Ernest A. Regna
United States Environmental Polution Agency
Region 11
26 Federal Plaza
New York, New York 10278

Dear Mr. Regna: Subject: RCRA Inspection Violations at Alco Power Inc. - NYD 000368423

In response to your certified letter dated May 2, 1984, Alco Power has made some progress toward the correction of the violations on our last RCRA inspection. We have been faced with three very critical events - all of which are high priority and have consumed enormous numbers of hours. We have been faced with a severe downturn in business, our company purchased by Bombardier of Canada in the Spring, and we are in the thirteenth week of a United Steelworkers' strike.

We, at Alco, are very proud of our record of cooperation with all aspects of governmental policies and mandates concerning the environment. We are equally pleased with the cooperation and assistance we have received from these government agencies. It is not our intent to disregard the findings of the inspection relative to these polution problems.

Mr. Obara is no longer with Alco, therefore, all future correspondence should be directed to myself or to Mr. Robert Lustenader. Mr. Obara's leaving has caused a temporary break in continuity between Alco and EPA Agencies.

Our progress to date is as follows:

I spoke with Ms. Catherine Massimino on several occasions in an effort to further define the nature of the violations. We agreed that three major areas must be addressed: (1) the tank overflow system, (2) personnel training and records, and (3) a contingency plan and emergency procedures.

(1) Tank Overflow System

Kevin Hanifin, who performed the inspection, further defined the problem with the tank overflow system. This problem does not involve our primary waste holding tank as Ms. Massimino and I originally thought. It pertains to the chip drainage area where coolant is drained from our chip hoppers and into a holding sump by way of a cement slab tapered toward the sump from all sides. This cement slap and sump are not "under roof," therefore, it is conceivable that a very violent rainstorm could flood the sump and overflow into a

NEW YORK
ENVIRONMENTAL
JUN 7
REGIONAL HEARING CLERK
REGION II

(1) Tank Overflow System (Continued)

nearby storm sewer. The storm sewer would then flow into the Owasco Outlet and contaminate it with cutting oil and hydraulic oil. This is our most serious problem and we are presently evaluating the following option:

a. Close off the nearby storm sewer inlet. This seems not to be desirable because it does not address the problem. The flooding would cause a spill which must be controlled and a "clean-up" must occur. However, it would eliminate the contamination of the Owasco Outlet.

b. A more attractive solution would be to build a roof or enclose the chip drain area. This option will eliminate the problem, however, it would involve a considerable capital investment.

c. We are also considering moving the chip drainage to an inside location where it would be "under roof." We are presently doing some downsizing operations which may free up some inside square footage. This is an attractive solution because of low capital investment.

This evaluation is continuing and we hope to reach a decision in the near future. This is a very critical problem and will be addressed and corrected as soon as possible.

(2) Personnel Training and Records

I am presently defining a training schedule that fulfills the needs of Alco as well as conforms to requirements of RCRA. At the urging of Catherine Massimino, I am using "A Guide for Preparing RCRA Storage Permit Applications," as a reference for this training schedule.

(3) Contingency Plan and Emergency Procedures

Mr. Lustenader has outlined the contingency plan and emergency procedures. He has spoken with local water and sewer officials on this subject. We expect to complete the details in the near future. Again, we are using "A Guide for Preparing RCRA Storage Permit Applications" as a reference. We are tailoring the contingency plan to Alco's requirements and its hazardous waste.

As you can see, we are making some progress toward correcting the reported violations cited on the inspection checklist. We are asking for an extension of time to finalize our evaluations. Facilities and capital investments can then be committed to the project. Our new owners have not defined which product lines will be manufactured at the Auburn Plant, therefore, our needs are only historically based. It is possible that the new owners' product lines may require even more elaborate hazardous waste facilities.

We are therefore asking for an extension until the late Fall of 1984.

Very truly yours,

R. W. Summerville

RWS:MK

cc: Catherine Massimino
Richard Baker
Steven Lackey

PAB

R

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Richard O'Bara
Laboratory Manager
Alco Power, Inc.
100 Orchard Street
Auburn, NY 13021

Re: EPA Identification Number: NYD000360423
Facility Location: Same
Inspection Date: September 9, 1983

Dear Mr. O'Bara:

The Environmental Protection Agency (EPA) is charged with the responsibility for implementing the Resource Conservation and Recovery Act (RCRA) and its associated regulations: Title 40 of the Code of Federal Regulations (40 CFR) Parts 260-267, and 270-271.

By notification you informed EPA that you conduct activities involving hazardous waste subject to RCRA at the above referenced facility. In accordance with EPA's responsibility, an inspection was performed at this facility by a duly authorized representative of EPA. This inspection revealed that the following regulatory violations existed at the time of the inspection:

1. 40 CFR §262.34(a) allows a generator to accumulate hazardous waste in containers and tanks for a period of no more than 90 days provided the accumulation conforms to certain regulations. At the time of the inspection, it was revealed that your facility did not meet the requirements of:

- 40 CFR 262.34(a)(1) which requires a generator to comply with the requirements in 40 CFR 265 Subparts I (Containers) and J (Tanks). At the time of the inspection, containers and/or tanks were observed which failed to comply fully with these Subparts. You were therefore in violation of 40 CFR 262.34(a)(1).

- 40 CFR §262.34(a)(4) which requires a generator to comply with the requirements in 40 CFR 265 Subpart C (Preparedness and Prevention) and 40 CFR 265 Subpart D (Contingency Plan and Emergency Procedures) and with §265.16 (Personnel Training). You were therefore in violation of 40 CFR 262.34(a)(4).

It is requested that, within sixty (60) days of your receipt of this letter, you send a letter to this office outlining the remedial actions taken or to be taken to correct these deficiencies. Also, you should be aware that these violations have resulted in your facility being designated as a high priority site for reinspection during 1984.

Please address response to:

- Ernest A. Regna
  Chief, Solid Waste Branch
  Air and Waste Management Division
  U. S. Environmental Protection Agency, Region II
  26 Federal Plaza
  New York, NY 10278

with copies to:

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

and

- Steven Lackey
  Regional Solid Waste Engineer, Region 7
  New York State Department of Environmental Conservation
  7481 Henry Clay Boulevard
  Liverpool, NY 13088

<u>You must include your EPA Identification number on all correspondence.</u>

Your failure to respond to this letter may cause this matter to be forwarded to our attorneys for further enforcement action.

Should you have questions about this Notice or should you wish to discuss this matter further, please contact Catherine Massimino of my staff at (212) 264-1317. A copy of the inspection report is enclosed.

Sincerely yours,

Ernest A. Regna
Chief
Solid Waste Branch

Enclosure

cc: David Mafrici, Chief
Bureau of Hazardous Waste Operations, NYSDEC, w/o encl.

Steven Lackey
Regional Solid Waste Engineer, Region 7, NYSDEC, w/o encl.

bcc: Catherine Massimino, 2AWM-SW w/encl.
Richard A. Baker, 2PM-PA w/o encl.
Roberty Garrity, 2AWM-SW w/o encl.

[illegible]-15(7/82)

RCRA INSPECTION FORM

1

Report Prepared for:

Generator ☒

Transporter ☐

HWM (TSD) facility ☐

Copy of report sent to the facility ☐

Facility Information

Name: Alco Power Inc

Address: 100 Orchard Street
Auburn, N.Y. 13021

EPA ID#: NYD000368423

Date of Inspection: 9/9/83

Participating Personnel

State or EPA Personnel: Kevin Hanifin
NYS DEC

Facility Personnel: Richard O'Brien
Laboratory Manager

Report Prepared by Name:

Agency:

Telephone #:

Approved for the Director by:

[illegible]ED

[illegible] 1983

HAZARDOUS [illegible] DIVISION [illegible] SOLID WASTE

Summary of Findings

Facility Description and Operations

Manufacturing of Diesel Engines.

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

(1) Chromic Acid - Used in Salvage of Parts. for bringing parts up to Specifications

(2) Savasol (Product Name) Used to clean parts and waste is introduced into same tank as the hydraulic and cutting oils for shipment to Frontier Chemical Company. Oil + Solvent mixture is treated as a waste.

chlorinated Cutting Oil

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

I Kerosene (Savasol) - Ignitability - 10 gallons approximate amt which is mixed with the oils, also rarely known

C No Chromic Acid Waste on Site. - Centrac N.Y. Industrial Services

U220 Toulene. - None on Site (Paint Thinner)

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:

- [x] Company admits that its waste is hazardous during the inspection.
- [x] 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)
- [x] 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)

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? Did not have any test results available	X		
Is the waste hazardous?	X		
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. 36 - 2500 gallon shipments			
262.21 Does each manifest (or representative sample) have the following information? Please circle the missing elements.			
— a manifest document number?	✓		
— the generators name, mailing address, telephone number and EPA I.D. Number?	✓		
— the transporters name and EPA I.D. Number?	✓		
— the name, address and EPA ID Number of the designated facility?	✓		
— a description of the wastes (DOT)?	✓		
— 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?	✓		
— 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?	✓		
(obtain a copy of the incomplete manifests)	✓		

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) No waste analysis	✓		
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?	✓		
If not, have Exception Reports been submitted to EPA covering any of these shipments made more than 45 days ago?			

Misplaced TSD facility copies for shipments of 5/10/83, 5/9/83, 2/2/83, 11/10/83. Will send to me when

40 CFR 262 - Subpart C - Pretransportation Requirements	YES	NO	N/A
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)			✓
2) Label each package according to DOT (i.e., 49 CFR 172) Pumped directly from Tank to Tanker Truck of Transporter			✓
3) Mark each package according to DOT (i.e., 49 CFR 172)			✓
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)			✓
262.34 Accumulation Time			
1) How is waste accumulated on-site?			
☐ Containers			
☑ Tanks			
☐ Surface impoundments (complete SWF checklist)			
☐ Piles (complete SWF checklist)			
2) Is waste accumulated for more than 90 days? If yes, complete SWF checklist		✓	
3) Is each container clearly dated with each period of accumulation so as to be visible for inspection? Tank is underground			✓
4) Is each container or tank marked or labeled with the words "hazardous waste" or in compliance with the DOT labeling requirements?		✓	

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

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).			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?			X

40 CFR 265 Subpart J - Tanks	YES	NO	N/A
265.190 1) What are the approximate number and size of tanks containing hazardous waste? 1 - 3000 gallon			
2) Identify the waste treated/stored in each tank. Hydraulic Oil, Cutting Oil, Sunsol (Kerosene)			
265.192 - General Operating Requirements			
1) Are the tanks maintained so that there is no evidence of past, present, or risk of future leaks?	✓		
If no, please explain. TANK HAS AN over flow system of which MR. OBARA did not know to much			
2) Are there leaking tanks? About. Over flow goes into storm sewer which leads to the Ouasco creek		✓	
3) Are all hazardous wastes or treatment reagents being placed in tanks compatible with the tank material so that there is no danger of ruptures, corrosion, leaks or other failures?	✓		
4) Do uncovered tanks have at least 2 feet of freeboard or an adequate containment structure?			✓
5) If waste is continuously fed into a tank, is the tank equipped with a means to stop the inflow from the tank? e.g. bypass system to a standby tank		✓	
265.194 - Inspections			
1) Is the tank(s) inspected each operating day for			
a) discharge control equipment		✓	
b) monitoring equipment		✓	
c) level of waste in tank		✓	
2) Are the tanks and surrounding areas (e.g., dike) inspected weekly for leaks, corrosion or other failures?	✓		
3) Are there underground tanks?	✓		
If yes, how many and can they be entered for inspection? 1 - Can be entered if empty			
265.198 - Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction?	✓		
If no, please explain.			
265.199 - Does it appear that incompatible wastes are being stored separate from each other?			✓

	YES	NO	N/A
265.16 - Personnel Training			
1) Have facility personnel successfully completed a program of classroom instruction or on-the-job training within 6 months of having been employed?	✓		
If yes, have facility personnel taken part in an annual review of training?	✓		
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?		✓	
—type and amount of training to be given to personnel in jobs related to hazardous waste management?		✓	
—actual training or experience received by personnel?		✓	
3) Are training records kept on all employees for at least 3 years?		✓	
40 CFR 265 - Subpart C - Preparedness and Prevention			
265.32 Does the facility comply with preparedness and prevention requirements including maintaining:			
— an internal communications or alarm system?	✓		
— a telephone or other device to summon emergency assistance from local authorities?	✓		
— portable fire equipment?	✓		
— water at adequate volume and pressure to supply water hose streams, foam producing equipment, etc.	✓		
265.33 Is equipment tested and maintained?	✓		
265.34 Is there immediate access to communications or alarm systems during handling of hazardous waste?	✓		
265.35 Adequate aisle space?			✓
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.	✓		
40 CFR 265 - Subpart D - Contingency Plan and Emergency Procedures			
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?		✓	
2) Has the contingency plan been submitted to the local authorities?		✓	
3) Does the plan list names, addresses and phone numbers of Emergency Coordinators?		✓	
4) Does the plan have a list of what emergency equipment is available?		✓	
5) Is there a provision for evacuating facility personnel?		✓	
6) Was there an emergency coordinator present or on call at the time of the inspection?		✓	

ALCO

Alco Power Inc.

100 Orchard Street, Auburn, N.Y. U.S.A. 13021
315/253-3241, Telex: 937-300, Cable: ALCO AUBURN

August 26, 1980

SEP 3 11 26 AM '80
ENVIRONMENTAL PROTECTION AGENCY
NEW YORK, N.Y. 10007
PERMITS ADMINISTRATION BRANCH

Mr. Tom Taccone
Permits Administration Branch
United States Environmental Protection Agency
Region II
26 Federal Plaza
New York, New York 10278

Dear Sir:

Alco Power Inc. has recently received two sets of Notification of Hazardous Waste Activity forms.

One set was supplied using EPA ID #NYD000368423; the second was supplied using EPA ID #NYD051735462. Del'd 9/4

EPA form 8700-12 was completed using EPA ID #NYD000368423.

As this plant is considered to be one facility, I was informed, per a telephone conversation with your department, that the set of forms using EPA ID #NYD051735462 need not be completed.

If this procedure is incorrect, please contact the undersigned.

Very truly yours,

Richard Obara
Manager, Metallurgical & Chemical Laboratories

RO:jh

xc: R. D. Smalley

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 ▶ [illegible]

ALCO POWER INC.
100 ORCHARD STREET
[illegible] NY 13021

INSTALLATION ADDRESS ▶ 100 ORCHARD STREET
[illegible] NY 13021

EPA Form 8700-12B (4-80) 11/07/80

47-15-14(5/81)

OCT 28 1981

RCRA GENERATOR INSPECTION FORM

COMPANY NAME:
Alco Power Inc

EPA I.D. NUMBER:
NYD000368423

COMPANY ADDRESS:
100 Crosfield Street

COMPANY CONTACT OR OFFICIAL:
Paul Gilson
Richard [illegible]

INSPECTOR'S NAME:
Kevin Hanson

TITLE:
Maintenance Foreman
Chemical Lab Manager

BRANCH/ORGANIZATION:
NYS DEC

CHECK IF FACILITY IS ALSO A TSD FACILITY /_/

DATE OF INSPECTION:
9/15/81

	YES	NO	DON'T KNOW
(1) Is there reason to believe that the facility has hazardous waste on site?	X		

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

/X/ Company admits that its waste is hazardous during the inspection.

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

/X/ 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)

/_/ EPA 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)

	YES	NO	DON'T KNOW
c. Does each manifest (or a representative sample) have the following information?			
- a manifest document number	X		
- the generator's name, mailing address, telephone number, and EPA identification number	X		
- the name, and EPA identification number of each transporter	X		
- the name, address and EPA identification number of the designated facility and an alternate facility, if any:	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, packaged, marked, and labeled, and are in proper condition for transportation under regulations of the Department of Transportation and the EPA			
(5) Were there any hazardous wastes stored on site at the time of the inspection?	X		
a. If "yes," do they appear properly packaged (if in containers) or, if in tanks, are the tanks secure?	X		
b. If not properly packaged or in secure tanks, please explain.			
c. Are containers clearly marked and labelled?		X	
d. Do any containers appear to be leaking?		X	
e. If "yes," approximately how many?			

	YES	NO	DON'T KNOW
*(6) Has the generator submitted an annual report to EPA covering the previous calendar year? NA	___	___	___
a. How do you know?			
(7) Has the generator received signed copies (from the TSD facility) of all manifests for wastes shipped off site more than 35 days ago?	___	X	___
a. If "no," have Exception Reports been submitted to EPA covering these shipments?	___	X	___

(8) General comments.

Spent solvents are mixed with waste oil and then shipped as waste oil to Cate Oil Services as [illegible]

* The effective date for this requirement is March 1, 1982.

	YES	NO	DON'T KNOW
b. Is there reason to believe that there are hazardous wastes on-site which the company claims are merely products or raw materials?	___	X	___

Please explain:

c. Identity the hazardous wastes that are on-site, and estimate approximate quantities of each.

2000 gallons of a mixture of waste chlorinated [illegible], [illegible] cutting oils and [illegible] such as perchloroethylene.

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

Metal cleaning
Ceramic acid

(2) Is hazardous waste stored on site?	X	___	___
a. What is the longest period that it has been accumulated?			

1 month

b. Is the date when drums were placed in storage marked on each drum?	___	___	___

[illegible]

(3) Has hazardous waste been shipped from this facility since November 19, 1980?	X	___	___
a. If "yes," approximately how many shipments were made?			

[illegible]

(4) Approximately how many hazardous waste shipments off site have been made since November 19, 1980?			
a. Does it appear from the available information that there is a manifest copy available for each hazardous waste shipment that has been made? [illegible]	___	___	___

b. If "no" or "don't know," please elaborate.

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

Form Approved OMB No. 158-R0018
GSA No. 0246-EPA-OT

U.S. ENVIRONMENTAL PROTECTION AGENCY

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO. NYD000368423

I. NAME OF INSTALLATION ALCO POWER INC.

II. INSTALLATION MAILING ADDRESS ~~WHITE INDUSTRIAL POWER INC~~ ~~COLUMBUS & ORCHARD STS~~ ~~AUBURN, NY 13021~~

III. LOCATION OF INSTALLATION ~~COLUMBUS & ORCHARD STS~~ ~~AUBURN NY 13021~~

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)*.

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED (yr., mo., & day)
F NYD000368423 31		800701

I. NAME OF INSTALLATION

ALCO POWER INC.

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX	CITY OR TOWN	ST.	ZIP CODE
3 100 ORCHARD STREET	4 AUBURN	NY	13021

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER	CITY OR TOWN	ST.	ZIP CODE
5 100 ORCHARD STREET	6 AUBURN	NY	13021

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)	PHONE NO. (area code & no.)
2 OBARA RICHARD, MANAGER, LABS.	315.253.3241

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 GENERAL ELECTRIC COMPANY LTD.

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)*
- [ ] 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.

CONTINUE ON REVERSE

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

03/07/2003

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	**NYD000368423**
INSTALLATION NAME	**AUBURN TECHNOLOGY INC**
INSTALLATION ADDRESS	**151 ORCHARD ST AUBURN, NY 13021**
MAILING ADDRESS	**151 ORCHARD ST AUBURN, NY 13021**

EPA Form 8700-12AB (4-90)

USEPA - REGION 2
RCRA Programs Branch
290 Broadway, 22nd Floor
New York, NY 10007-1866

ATTN: RCRA NOTIFICATIONS
Tel : (212) 637-4106
Fax: (212) 637-3056

TO: AUBURN TECHNOLOGY INC
or Current Occupant
ATTN: BRIAN BAY - MGR
151 ORCHARD ST
AUBURN, NY, 13021

Change (address 911)

OMB#: 2050-0175 Expires 12/31/2003

MAIL THE COMPLETED FORM TO: The Appropriate State or EPA Regional Office.	United States Environmental Protection Agency **RCRA SUBTITLE C SITE IDENTIFICATION FORM**	ENVIRONMENTAL PROTECTION AGENCY REGION 2002 NOV 26 AM RCRA PROGRAM

1. Reason for Submittal (See instructions on page 23) MARK CORRECT BOX(ES)	Reason for Submittal: ☐ To provide Initial Notification of Regulated Waste Activity (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities). ☒ To provide Subsequent Notification of Regulated Waste Activity (to update site identification information) ☐ As a component of a First RCRA Hazardous Waste Part A Permit Application. ☐ As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment #_____) ☐ As a component of the Hazardous Waste Report.
2. Site EPA ID Number (See instructions on page 24)	EPA ID Number: NYD 980 368 423
3. Site Name (See instructions on page 24)	Name: AUBURN TECHNOLOGY, INC.
4. Site Location Information (See instructions on page 24)	Street Address: 151 ORCHARD STREET City, Town, or Village: AUBURN — State: NEW YORK County Name: CAYUGA — Zip Code: 13021-3251
5. Site Land Type (See instructions on page 24)	Site Land Type: ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other
6. North American Industry Classification System (NAICS) Code(s) for the Site (See instructions on page 24)	A. 336413 — B. 33651 C. — D.
7. Site Mailing Address (See instructions on page 25) SAME	Street or P. O. Box: City, Town, or Village: State: Country: — Zip Code:
8. Site Contact Person (See instructions on page 25)	First Name: BRIAN — MI: G — Last Name: BAY Phone Number: (315) 255-7777 — Phone Number Extension: N/A
9. Legal Owner and Operator of the Site (See instructions on pages 25 to 26)	A. Name of Site's Legal Owner: — Date Became Owner (mm/dd/yyyy): Owner Type: ☐ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other B. Name of Site's Operator: — Date Became Operator (mm/dd/yyyy): 7/89 Operator Type: ☐ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other

Potentially Waived

EPA ID No. NYD000368423

10. Type of Regulated Waste Activity (Mark the appropriate boxes for activities that apply to your site. See instructions on pages 26 to 30)

A. Hazardous Waste Activities

1. Generator of Hazardous Waste (Choose only one of the following three categories.)

- [X] a. LQG: Greater than 1,000 kg/mo (2,200 lbs./mo.) of non-acute hazardous waste; or
- [ ] b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs./mo.) of non-acute hazardous waste; or
- [ ] c. CESQG: Less than 100 kg/mo (220 lbs./mo.) of non-acute hazardous waste

In addition, indicate other generator activities. (Mark all that apply)

- [ ] d. United States Importer of Hazardous Waste
- [ ] e. Mixed Waste (hazardous and radioactive) Generator

For Items 2 through 6, mark all that apply.

- [ ] **2. Transporter of Hazardous Waste**
- [ ] **3. Treater, Storer, or Disposer of Hazardous Waste (at your site)** Note: A hazardous waste permit is required for this activity.
- [ ] **4. Recycler of Hazardous Waste (at your site)** Note: A hazardous waste permit may be required for this activity
- **5. Exempt Boiler and/or Industrial Furnace**
  - [ ] a. Small Quantity On-site Burner Exemption
  - [ ] b. Smelting, Melting, and Refining Furnace Exemption
- [ ] **6. Underground Injection Control**

B. Universal Waste Activities

1. Large Quantity Handler of Universal Waste (accumulate 5,000 kg or more) (refer to your State regulations to determine what is regulated). Indicate types of universal waste generated and/or accumulated at your site. (Mark all boxes that apply):

	Generate	Accumulate
a. Batteries	[X]	[ ]
b. Pesticides	[ ]	[ ]
c. Thermostats	[ ]	[ ]
d. Lamps	[X]	[ ]
e. Other (specify) ____	[ ]	[ ]
f. Other (specify) ____	[ ]	[ ]
g. Other (specify) ____	[ ]	[ ]

- [ ] **2. Destination Facility for Universal Waste** Note: A hazardous waste permit may be required for this activity

C. Used Oil Activities (Mark all boxes that apply.)

1. Used Oil Transporter - Indicate Type(s) of Activity(ies)
- [ ] a. Transporter
- [ ] b. Transfer Facility

2. Used Oil Processor and/or Re-refiner - Indicate Type(s) of Activity(ies)
- [ ] a. Processor
- [ ] b. Re-refiner

- [ ] **3. Off-Specification Used Oil Burner**

4. Used Oil Fuel Marketer - Indicate Type(s) of Activity(ies)
- [ ] a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
- [ ] b. Marketer Who First Claims the Used Oil Meets the Specifications

11. Description of Hazardous Wastes (See instructions on page 31)

A. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

D001	D002	D007	D035	D040	F001	F003
F007						

2002 NOV 26 AM 9:15

OMB#. 2050-0175 Expires 12/31/2003

EPA ID No. N Y D 0 0 0 5 6 8 4 2 3

B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes. Please list the waste codes of the State-regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed for waste codes.

12. Comments (See instructions on page 31)

ITEM #4: NUMERICAL OF FACILITY CHANGED TO 151 FROM 100 AFTER COUNTY 911 WENT ONLINE

ITEM #8: UPDATED CONTACT INFORMATION

ITEM #9: OWNER / OPERATOR DID NOT CHANGE

13. Certification. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. **(See instructions on page 31)**

Signature of owner, operator, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
James P. Tooley	James P. Tooley, General Manager	11/20/2002

2002 NOV 26 AM 9:14

The name was change in 7/89 per Brian Bay

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: May 12, 2014 - 2:56 PM

Version 5.0

User Selection Criteria

Location:	New York, all activities	**Activity Location:**	None Chosen
Handler ID:	NYD000368423	**Group of IDs:**	None Chosen
Handler Name:			
Handler Universe:	All Facilities Regardless of Universe		
Determined Date Range:	From: 10/01/1980 To: 05/12/2014		
Location County Code:	None Chosen	**Evaluation Type:**	
Location City:		**Focus Area:**	
Location Zip Code:		**Violation Type:**	
State District:	None Chosen	**Display Code Descrip.:**	Yes
Sort Order:	Region, State, Handler Name	**Display Universes:**	Yes

Results

Data meeting the criteria you selected follows.

Total Pages: 5 Total Handlers: 1

Report Description

This report presents available information from the Resource Conservation and Recovery Act Information System (RCRAInfo) about compliance evaluations, violations, and enforcement actions meeting the criteria supplied by the user. Evaluations showing no violations does not always indicate that no violations were determined. Violation without enforcement actions does not always mean no enforcement action will be issued. In order to avoid releasing enforcement sensitive information to the public the following information is not shown on the report: pending civil / judicial referrals, criminal actions and referrals, and State to EPA referrals; all other enforcement actions are released.

Report Information

Name:	cme_foia.rdf
Developed by:	EPA Headquarters, Office of Enforcement and Compliance Assurance
Deployed:	June 2006
Last Updated:	May 2012
Contact:	rcrainfo.help@epa.gov
Tables Used:	cmecomp3, ocitation3, hreport_univ5, lu_citation, lu_state, hid_groups
Libraries:	none

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: May 12, 2014 - 2:56 PM

AUBURN TECHNOLOGY, INC. County Name / Code: CAYUGA / NY011 **NYD000368423**

Location: ORCHARD STREET; AUBURN, NY 13021 **REGION 02**

Mailing: ORCHARD STREET; AUBURN, NY 13021

Activity Location: NY | State District: NYSDEC R7 | Accessibility: | Non-Notifier: | Extract Flag: Y | Active Site: Y

Generator: LQG | Transporter: N | Operating TSDF: —— | IC In Place: N | EI Indicator (HE / GW): N / N
Short-Term Gen: N | Transfer Facility: N | Offsite Receiver: N | HSM: N | Subpart K: —
Full Enforcement: —— | Converter: —— | State Unaddressed SNC: N | EPA Unaddressed SNC: N
CA Wild: N | State TSDF: —— | State Addressed SNC: N | EPA Addressed SNC: N
Active State Gen: N | State SNC w/Comp Sched: N | EPA SNC w/Comp Sched: N

Violation: Activity Location: NY | Type: 262.A | Determined Date: 08/28/2002 | Determined by Agency: State | Responsible Agency: State
Scheduled Compliance Date: | Actual Compliance Date: 09/11/2002 | RTC Qualifier: DOCUMENTED | Sequence Number: 4
Former Citation - SR - 373-3.4(c)(*)

CEI Evaluation 08/28/2002 | Activity Location: NY | By: State | Identifier: 001 | Person: NYBRS | Branch: R7 | Found Violation: YES
Citizen Complaint: NO | Multimedia Inspection: NO | Sampling: NO | Not Subtitle C: NO | Day Zero: | Focus Area:

Enforcement: Activity Location: NY | Type: 120 | Action Date: 08/30/2002 | Identifier: 001
Docket: | Agency: State | Responsible Person: NYBRS | Branch: R7
CA Component: N | Disposition Status: | Appeal Initiated: | Appeal Resolved:

Violation: Activity Location: NY | Type: 262.A | Determined Date: 01/27/1995 | Determined by Agency: State | Responsible Agency: State
Scheduled Compliance Date: 02/27/1995 | Actual Compliance Date: 02/21/1995 | RTC Qualifier: OBSERVED | Sequence Number: 3

CEI Evaluation 12/19/1994 | Activity Location: NY | By: State | Identifier: 000 | Person: NYBRS | Branch: R7 | Found Violation: YES
Citizen Complaint: NO | Multimedia Inspection: NO | Sampling: NO | Not Subtitle C: NO | Day Zero: | Focus Area:

Enforcement: Activity Location: NY | Type: 120 | Action Date: 01/27/1995 | Identifier: 000
Docket: | Agency: State | Responsible Person: NYBRS | Branch: R7
CA Component: N | Disposition Status: | Appeal Initiated: | Appeal Resolved:

Violation: Activity Location: NY | Type: 262.A | Determined Date: 11/19/1986 | Determined by Agency: State | Responsible Agency: State
Scheduled Compliance Date: 04/07/1987 | Actual Compliance Date: 04/27/1987 | RTC Qualifier: OBSERVED | Sequence Number: 2

CEI Evaluation 11/19/1986 | Activity Location: NY | By: State | Identifier: 003 | Person: NYDEC | Branch: | Found Violation: YES
Citizen Complaint: NO | Multimedia Inspection: NO | Sampling: NO | Not Subtitle C: NO | Day Zero: | Focus Area:

Enforcement: Activity Location: NY | Type: 120 | Action Date: 01/14/1987 | Identifier: 002
Docket: | Agency: State | Responsible Person: NYDEC | Branch:
CA Component: N | Disposition Status: | Appeal Initiated: | Appeal Resolved:

Violation: Activity Location: NY | Type: 262.A | Determined Date: 09/09/1983 | Determined by Agency: State | Responsible Agency: State
Scheduled Compliance Date: | Actual Compliance Date: 04/27/1987 | RTC Qualifier: OBSERVED | Sequence Number: 1

CEI Evaluation 09/09/1983 | Activity Location: NY | By: State | Identifier: 001 | Person: | Branch: | Found Violation: YES
Citizen Complaint: NO | Multimedia Inspection: NO | Sampling: NO | Not Subtitle C: NO | Day Zero: | Focus Area:

* Note: Penalty amount may not reflect all violations cited.

AUBURN TECHNOLOGY, INC., NYD000368423, AUBURN, NY, continued -

No Linked Enforcements

Evaluations With No Violations:

CEI Evaluation	03/26/1990	Activity Location: NY	By: State	Identifier: 005	Person: NYDEC	Branch:	Found Violation: NO	
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:	
CEI Evaluation	06/20/1988	Activity Location: NY	By: State	Identifier: 004	Person: NYDEC	Branch:	Found Violation: NO	
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:	
CEI Evaluation	10/19/1984	Activity Location: NY	By: State	Identifier: 002	Person:	Branch:	Found Violation: NO	
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:	

Orphan Enforcement Actions:

Enforcement: Activity Location: NY	Type: 120	Action Date: 05/02/1984	Identifier: 001	
Docket:	Agency: EPA	Responsible Person: R2CM	Branch:	
CA Component: N	Disposition Status:	Appeal Initiated:	Appeal Resolved:	

Total Number of Handlers: 1

Total Number of Activity Locations: 1

* End of Report *

* Note: Penalty amount may not reflect all violations cited.

Description of codes used on the report:

Universes	Description of Universes
Generator	Indicates that the facility is a Large Quantity Generator (LQG), Small Quantity Generator (SQG), Conditionally Exempt Small Quantity Generator (CEG), or not a generator (N).
Transporter	Indicates that the facility Transports waste subject to RCRA regulations. ('Y' indicates that the facility is in this universe).
Operating TSDF	Indicates that the facility is a Treatment, Storage or Disposal facility subject to any type of enforcement. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
IC in Place	Indicates that the facility has Institutional Controls in place. ('Y' indicates that the facility is in this universe).
EI Indicator (HE / GW)	Indicates that the facility has controls in place for Environmental Indicators. HE - Human Exposures ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist) GW - Groundwater Release ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist)
Short-Term Gen	Indicates that the facility is a short term or one time event generator and not generating from ongoing processes.
Transfer Facility	Indicates that the facility transfers hazardous waste.
Offsite Receiver	Indicates that the facility, whether public or private, currently accepts hazardous waste from another site (site identified by a different EPA ID).
HSM	Indicates that the facility manages hazardous secondary material(s) (e.g. spent material, by-product or sludge) that when discarded, would be identified as hazardous waste.
Subpart K	Indicates that the facility has optec into the subpart K laboratory rule. It then specifies the type of facility (C - College or University; H - Teaching Hospital; N - Non-profit Research Institute; W - withdrawal from the rule)
Full Enforcement	Indicates that the facility is a Treatment, Storage or Disposal facility which is part of the Full Enforcement universe. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
CA Workload	Indicates that the facility is part of the Corrective Action Workload universe. ('Y' indicates that the facility is in this universe).
Active State Gen	Indicates that the facility is an Active State Generator. ('Y' indicates that the facility is in this universe).
Converter	Indicates that the facility is a Converter Treatment, Storage or Disposal facility. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
State TSDF	Indicates that the facility is a State Treatment, Storage or Disposal facility. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
State Unaddressed SNC	Indicates that the facility is a State Unaddressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
State Addressed SNC	Indicates that the facility is a State Addressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
State SNC w/ Compl. Sched	Indicates that the facility is a State Significant Non-Complier with a Compliance Schedule. ('Y' indicates that the facility is in this universe).
EPA Unaddressed SNC	Indicates that the facility is an EPA Unaddressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
EPA Addressed SNC	Indicates that the facility is an EPA Addressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
EPA SNC w/ Compl. Sched	Indicates that the facility is a EPA Significant Non-Complier with a Compliance Schedule. ('Y' indicates that the facility is in this universe).

* Note: Penalty amount may not reflect all violations cited.

Description of codes used on the report:

ACCESSIBILITY - indicates the reason why the handler is not accessible for normal RCRA tracking and processing (previously called Bankrupt Indicator):

Code	Description
B	indicates that the handler has filed for bankruptcy and bankruptcy litigation is in process.
C	indicates that all RCRA responsibilities for permitting/closure, corrective action, and compliance monitoring and enforcement at the facility have been formally transferred to the CERCLA program or state equivalent.
F	indicates that all responsible parties (owners/operators) for the handler have fled the country or are otherwise not available for prosecution.
L	indicates that the handler's case is tied up in litigation to the extent that further progress in achieving RCRA compliance through normal enforcement is not possible.

NON-NOTIFIER - Indicates that the handler has been identified through a source other than Notification and is suspected of conducting RCRA-regulated activities without proper authority.

Code	Description
E	indicates that the handler was initially a non-notifier, subsequently determined to be exempt from requirements to notify.
O	indicates that the handler is a former non-notifier.
X	indicates that the handler is a non-notifier.

Violation Type	Description
262.A	GENERATORS - GENERAL

Evaluation Type	Type Description
CEI	COMPLIANCE EVALUATION INSPECTION ON-SITE

Enforcement Type	Enforcement Description
120	WRITTEN INFORMAL

* Note: Penalty amount may not reflect all violations cited.