RCRA PRIORITIZATION SYSTEM SCORING SUMMARY

FOR

BENDIX CORPORATION

EPA SITE NUMBER: NJD07~~8~~7144 33 NJD 0787144 33

TETERBORO, NJ

SCORED BY: ROB SAVILL

OF CDM FEDERAL

ORIGINAL RANKING: 11/12/93 LAST RANKING: 11/12/93

GROUNDWATER SCORE	:	65.38
SURFACE WATER SCORE	:	57.77
AIR ROUTE SCORE	:	27.45
ONSITE SCORE	:	28.57
---		---
MIGRATION SCORE	:	47.91

medium
11/93 in RCRIS

EPA ID NO. : NJD07841443
BENDIX CORPORATION

WS-1 GROUNDWATER ROUTE

IS THERE AN OBSERVED RELEASE? Y

ROUTE CHARACTERISTICS

DEPTH TO AQUIFER (FT.) : NA

NET PRECIPITATION (IN.) : NA

PHYSICAL STATE: NA

CONTAINMENT:

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: VINYL CHLORIDE

TOXICITY/PERSISTANCE VALUE: 15

QUANTITY KNOWN? YES

CUBIC YARDS OR TONS: 0
DRUMS : 145

TARGETS

GROUNDWATER USE: DRINKING WATER

DISTANCE TO WELL (MILES): 0.4

EPA ID NO. : NJD07841443
BENDIX CORPORATION

WS-2 SURFACE WATER ROUTE

RELEASES

IS THERE AN OBSERVED RELEASE? N

IS THERE A PERMITTED OUTFALL? Y

HAVE THERE BEEN PERMIT VIOLATIONS? N

ROUTE CHARACTERISTICS

FACILITY LOCATION: 100-YEAR FLOOD PLAIN

24-HOUR RAINFALL: 2.5

DISTANCE TO SURFACE WATER (MILES): 0.20

PHYSICAL STATE: LIQUID, GAS, SLUDGE

CONTAINMENT: POOR

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: COPPER

TOXICITY/PERSISTANCE VALUE: 18

QUANTITY KNOWN? NO

CUBIC YARDS OR TONS: 0
DRUMS : 0

AMOUNT IS LIKELY TO BE SMALL

TARGETS

SURFACE WATER USE: POSSIBLE DRINKING WATER OR RECREATION

DISTANCE TO INTAKE OR CONTACT POINT (MILES): 0.4

DISTANCE TO SENSITIVE ENVIRONMENT (MILES): 0.4

EPA ID NO. : NJD07841443
BENDIX CORPORATION

WS-3 AIR ROUTE

RELEASES

IS THERE AN OBSERVED, UNPERMITTED, ON-GOING RELEASE? N

DOES THE FACILITY HAVE AN AIR OPERATING PERMIT(S)? Y

HAVE THERE BEEN ANY PERMIT VIOLATIONS OR ODOR COMPLAINTS BY RESIDENTS? Y

CAN CONTAMINANTS MIGRATE INTO AIR? Y

CONTAINMENT: FAIR

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: PERCHLOROETHANE

TOXICITY/PERSISTANCE VALUE: 3

QUANTITY KNOWN? NO

CUBIC YARDS OR TONS: 0
DRUMS : 0

AMOUNT IS LIKELY TO BE SMALL

TARGETS

POPULAYION: RESIDENCES ARE LOCATED WITHIN FOUR MILES

DISTANCE TO SENSITIVE ENVIRONMENT (MILES): 0.4

EPA ID NO. : NJD07841443
BENDIX CORPORATION

WS-4 ON SITE CONTAMINATION

ACCESS TO SITE: LIMITED ACCESS

IS THERE AN OBSERVED SURFACE SOIL CONTAMINATION? Y

CONTAINMENT: FAIR

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: MERCURY

TOXICITY/PERSISTANCE VALUE: 3

TARGETS

DISTANCE TO RESIDENTIAL AREAS (MILES): 0.50

IS THERE AN ON-SITE SENSITIVE ENVIRONMENT: N

RCRA PRIORITIZATION SYSTEM SCORING SUMMARY

FOR
BENDIX CORPORATION
TETERBORO, NJ

EPA SITE NUMBER: NJD078411443

SCORED BY: NICOLA BIRD
OF CONFEDERAL PROGRAMS CORP.
ON 11/11/93

GROUNDWATER SCORE :

SURFACE WATER SCORE:

AIR ROUTE SCORE :

ONSITE SCORE :

MIGRATION SCORE :

Ref: Draft Environmental Priority Initiative -- Preliminary Assessment, by CEM Federal Programs Corp, September 18, 1993.

EPA ID NO. :

WS-1 GROUNDWATER ROUTE

IS THERE AN OBSERVED RELEASE? YES

Ref: Part II, Summ # 6, # 5, P.24

ROUTE CHARACTERISTICS

DEPTH TO AQUIFER (FT.) : < 20' Ref: Part III, # 3, p.29

NET PRECIPITATION (IN.) : 5-15" Ref: Part III, # 5, P.30

PHYSICAL STATE: LIQUID Ref: Part II, Summ #6 # 3, p. 23

CONTAINMENT: POOR (UST; no 2nd containment; documented soil + GW contamination)

Ref: Part II, Summ # 6, P.23

WASTE CHARACTERISTICS

NOTE: Vinyl Chloride is found in GW @ Summ 6, but was not listed as being stored in the UST. (Assume it was stored in 8000 gallon UST at one time).

CHEMICAL NAME OR WASTE CODE NUMBER: VINYL CHLORIDE

Ref: Part II Summ # 6, # 5, p.24

TOXICITY/PERSISTANCE VALUE: 15 Ref: Toxicity Table

QUANTITY KNOWN: YES

CUBIC YARDS OR TONS:

DRUMS : 8000 gallons

Ref: Part II, Summ # 6, # 2, p. 23

TARGETS

GROUNDWATER USE: DRINKING Ref: Part III, # 6, p.30

DISTANCE TO WELL (MILES): < 1/2 MILE

Ref: Part III, # 7, p 30

EPA ID NO. : NJD075444

WS-2 SURFACE WATER ROUTE

RELEASES

IS THERE AN OBSERVED RELEASE? NO (Note: contamination has been detected in drainage ditches, but is alleged to originate from off site)

Ref: Ref #1 of COM Federal EPI (12/9/91 Site Inspection, p.8) & Ref #27 of COM Federal EPI (Chemical Characterization Report, Ap. I 91)

IS THERE A PERMITTED OUTFALL? YES

HAVE THERE BEEN PERMIT VIOLATIONS? NO

ROUTE CHARACTERISTICS

FACILITY LOCATION: W/IN 100 YEAR FLOODPLAIN

Ref: Part III, # 9, p.31

24-HOUR RAINFALL: 2.1-3" Ref: Part III, # 14, P.32

DISTANCE TO SURFACE WATER (MILES): <1/4 MILE

Ref: Part III, #11, p.31

PHYSICAL STATE: LIQUID

CONTAINMENT: POOR (Open drainage ditches which collect surface water runoff & treated plating wastes)

Ref: Ref #1 of COM EPI (12/9/91 Site Inspection, p8)

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: COPPER

(Note: Copper has been found in sediments in ditch & is discharged @ 0.04 MGD)

Ref: Ref #1 of COM Federal EPI (12/9/91 Site Inspection, p8)

TOXICITY/PERSISTANCE VALUE: 18

Ref: Toxicity Table

QUANTITY KNOWN? NO

CUBIC YARDS OR TONS:

DRUMS : LIKELY SMALL

Ref: Ref #1 of COM Federal EPI (p.8 of Site Inspection)

(Discharge only occurs in the event of an emergency, but may be as much as 0.04 MGD in such a case.)

TARGETS

SURFACE WATER USE: RECREATION

Ref: Part III, #15, P.32

DISTANCE TO INTAKE OR CONTACT POINT (MILES): <1/2 MILE

Ref: Part III, # 11, P.31

DISTANCE TO SENSITIVE ENVIRONMENT (MILES): <1/2 MILE

Ref: Part III, #18 & 22

EPA ID NO. : NJD078441443

WS-3 AIR ROUTE

RELEASES

IS THERE AN OBSERVED, UNPERMITTED, ON-GOING RELEASE? NO

(All present ~~[illegible]~~ sources well contained, possible air contamin. from soil.)

DOES THE FACILITY HAVE AN AIR OPERATING PERMIT(S)? YES

Ref: Part I, #9, P.2

HAVE THERE BEEN ANY PERMIT VIOLATIONS OR ODOR COMPLAINTS BY RESIDENTS?

YES Ref: Part I, #12, Violations, P.5

CAN CONTAMINANTS MIGRATE INTO AIR?

(Solvents) YES Ref: Part II, Source #4, #4, P.18

CONTAINMENT:

FAIR (Previous to present Bldg, Outside drum rack)

Ref: Part II, Source #4, #4, P.18

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: PERCHLOROETHANE Ref: Part II, Source #4, #4, P.18

(potential releases from drums + contaminated soil)

TOXICITY/PERSISTANCE VALUE: 3 Ref: Toxicity Table

QUANTITY KNOWN?

CUBIC YARDS OR TONS:

DRUMS : Unknown. Likely Small

TARGETS

POPULATION: RESIDENCES WITHIN 4 MILES Ref: Part III #22, P.33

DISTANCE TO SENSITIVE ENVIRONMENT (MILES):

<1/2 MILE Ref: Part III, #18, P.33

EPA ID NO. : NJD078441443

WS-4 ON SITE CONTAMINATION

ACCESS TO SITE: LIMITED Ref: Figure 2, Site Map -- Does not explicitly show fence or gate, but most sources except surface water bodies are inaccessible

IS THERE AN OBSERVED SURFACE SOIL CONTAMINATION? YES

Ref: Part II, Source #4, #4, + #6, p. 18+19

CONTAINMENT:

FAIR (Previously, drums outside). Ref: Part II, Source #4, #4, p. 18

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: ~~[illegible]~~ MERCURY

Ref: Part II Source #4, #7, p. 19

TOXICITY/PERSISTANCE VALUE: 3 Ref: Toxicity Table

TARGETS

DISTANCE TO RESIDENTIAL AREAS (MILES): 1/2 - 1 MILE

Ref: Part III, #22, p33

IS THERE AN ON-SITE SENSITIVE ENVIRONMENT:

NO Ref: Part III, #18

Let's protect our earth

State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
Lance R. Miller, Acting Director
CN 028
Trenton, N.J. 08625-0028
(609) 633-1408
Fax # (609) 633-1454

ENVIRONMENTAL PROTECTION AGENCY
REGION II

90 MAR 20 AM 8:34

HAZARDOUS WASTE FACILITIES BRANCH

MAR 15 1990

NJD078714433

Matthew D. Watson
Environmental Engineer
Allied-Signal Aerospace Company
Guidance Systems Division
Teterboro, New Jersey 07608

RE: Less Than Ninety (90) Day Accumulation of Hazardous Waste in Above-Ground Tank, Allied-Signal Aerospace Company, Guidance Systems Division, Teterboro, EPA ID No. 078 714 433, TS-90-2

Dear Mr. Watson:

The Bureau of Hazardous Waste Engineering (the Bureau) acknowledges the receipt of your letter dated February 23, 1990, requesting a thirty (30) day extension needed to prepare and submit the engineering drawing as required by the Bureau's letter dated February 2, 1990.

The Bureau hereby grants the extension. The new due date for the above submittal is March 24, 1990.

If you have any questions concerning this matter, please contact Mr. Yefim Kantor of my staff at (609) 292-9880.

Very truly yours,

Thomas Sherman

Thomas Sherman, Chief
Bureau of Hazardous Waste Engineering

EP11/cfd
c: Barry Tornick, USEPA, Region II
Yacoub Yacoub, BME

DOCUMENT: ALLIED3
FOLDER: CFDMOB

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

02/28/00

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	→	**NJD078714433**
INSTALLATION NAME	→	**HONEYWELL INTL DEFENSE & AVONICS**
INSTALLATION ADDRESS	→	**699 RTE 46 E** **TETERBORO, NJ 07608**
MAILING ADDRESS	→	**699 RTE 46 E** **TETERBORO, NJ 07608**

EPA Form 8700-12AB (4-80)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY, 22nd Floor
NEW YORK, NEW YORK 10007-1866

ATTN: DIV OF ENVIRON PLANNING & PROTECTION
RCRA PROGRAMS BRANCH

TO: DUFLER, LOU
HS&E MGR
699 RTE 46 E
TETERBORO, NJ 07608

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

Form Approved, OMB No. 2050-0028 Expires 10/31/99
GSA No. 0246-EPA-OT

Notification of Regulated Waste Activity

EPA United States Environmental Protection Agency

Date Received (For Official Use Only)
U.S. EPA AGENCY RO II
00 FEB 1

Name Change

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

A. Initial Notification [ ] B. Subsequent Notification [X] (Complete item C)

C. Installation's EPA ID Number: N J D 0 0 8 8 1 4 4 4 5

II. Name of Installation (Include company and specific site name)

HONEYWELL INT. DEFENSE & AVONICS

III. Location of Installation (Physical address; not P.O. Box or Route Number)

Street: 699 ROUTE 46 EAST

Street (Continued):

City or Town: TETERBORO State: NJ Zip Code: 07608

County Code: County Name: BERGEN

IV. Installation Mailing Address (See instructions)

Street or P.O. Box: 699 ROUTE 46 EAST

City or Town: TETERBORO State: NJ Zip Code: 07608

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (Last): DUFLER (First): LOU

Job Title: MANAGER HS&E Phone Number (Area Code and Number): 201-393-3810

VI. Installation Contact Address (See instructions)

A. Contact Address: Location [X] Mailing [ ] B. Street or P.O. Box:

City or Town: State: Zip Code:

VII. Ownership (See instructions)

A. Name of Installation's Legal Owner: HONEYWELL INT. DEFENSE & AVONICS

Street, P.O. Box, or Route Number: 699 ROUTE 46 EAST

City or Town: TETERBORO State: NJ Zip Code: 07608

Phone Number (Area Code and Number): 201-393-2900

B. Land Type: P

C. Owner Type: P

D. Change of Owner Indicator: Yes [ ] No [X]

(Date Changed) Month Day Year

[redacted]

[redacted]

[redacted]

[redacted]

Honeywell

United States Environmental Protection Agency
Region II
Air and Waste Management Division
290 Broadway, 21st Floor
New York, New York 10007-1866

February 8, 2000

Attn: Air and Waste Management Division

Re: Notification of Regulated Waste Activity

Dear Sir or Madam:

Attached for your review and/or action is a Notification of Regulated Waste Activity for the Honeywell International site located at 699 Route 46, Teterboro, New Jersey.

Please be advised, that this form reflects name change only as AlliedSignal Inc. and Honeywell International have merged and the new Corporation now has taken the name of Honeywell International.

Honeywell International thanks the Agency for it's cooperation in this matter and if you have any questions, please do not hesitate to contact the undersigned at (201) 393-3810.

Sincerely,

Lou Dulfer

Mr. Lou Dulfer
Manager of Health, Safety and Environmental

Cc: NJDEP

CERTIFIED MAIL R.R.R.
7099 3400 0010 6251 1941

699 Route 46
Teterboro, NJ 07608

Honeywell

NJD078714433

U.S. EPA REGION II
01 JUN 12 PM 12:00
PROGRAMS BRANCH

June 6, 2001

United States Environmental Protection Agency
Region 2
Air & Water Management Division
290 Broadway, 21st Floor
New York, NY 10007-1866

Clean closed process units.

Attn: RCRA Notification

Re: Proposed General Electric/Honeywell International Transaction

Dear Sir or Madam:

As you are aware, this facility holds the permits and licenses identified below in this letter. Under an agreement that is currently being reviewed by regulatory authorities, all of the stock of the ultimate parent company of this facility, Honeywell International Inc., would be acquired by the General Electric Company. Although those authorities have not yet approved this proposed transaction, we wish to provide you with some background information on the proposed transaction as it relates to environmental permits and licenses.

First, the proposed transaction is structured such that Honeywell International (and its various subsidiaries) would continue as corporate entities in full legal force and effect after the merger. After the transaction is completed, Honeywell International would be a subsidiary of General Electric Company. To further explain, upon the closing of the transaction, a wholly-owned subsidiary of General Electric Company will merge with and into Honeywell International Inc with Honeywell International Inc. remaining as the surviving corporation and a wholly-owned subsidiary of General Electric Company. All of the shareholders of Honeywell International Inc. will receive General Electric stock and General Electric will receive all of the stock of Honeywell International Inc. Thus, while ownership of Honeywell International's stock will have changed as a consequence of the closing, ownership of Honeywell International's permits will be unaffected, as such permits will remain with their current owner, Honeywell International Inc., or their subsidiaries.

From the standpoint of existing environmental permits, there will be no legal change in the entity holding this facility's permits. In addition, there will be no change in ownership or control of the actual permit holder in those cases where the permit holder is a subsidiary of Honeywell International. Consequently, we would not anticipate that there would be a need to

CERTIFIED MAIL R.R.R.
7099 3400 0010 8251 1941

699 Route 46
Teterboro, NJ 07608

Honeywell

engage in efforts to transfer the permits below to a new legal entity, either before or after the completion of the proposed transaction. Should your review of the proposed transaction lead you to a different conclusion, however, please contact Louis Dulfer to further discuss this matter.

Through this notice both Honeywell International and General Electric hope to avoid confusion about the nature of the proposed transaction by providing you with this advance notice and specific information as to its form. This way, we hope to eliminate any concern over the continued accuracy of all existing permits. Pending necessary regulatory approvals, the proposed transaction is currently anticipated to close in mid -July. After the transaction has closed, the name of the operating entity associated with this facility may, in some instances, change. If and when there is a name change, we will send a follow-up notice.

This facility holds the following permits:

Permit Type:	Permit Number:
Hazardous Waste Identification Number	NJD078714433

If you have any questions or comments on the proposed merger, or if you wish to discuss the applicability of permit transfer requirements, please contact Louis Dulfer at (201)393-3810.

Sincerely,

Marc Szczerba
Vice President of Teterboro Operations

cc: Louis Dulfer, Honeywell International

A:\Permit Transfer Letter_USEPA.DOC

EPA

Handler Information

HONEYWELL INTL DEFENSE & AVONICS — **TETERBORO** — **NJD078714433**

Select the information to process:

Basic Handler Information

Handler Id	Handler Name	Facility Identifier	Extract Flag	Region	State	Universes
NJD078714433	HONEYWELL INTL DEFENSE & AVONICS		X	02	NJ	SUBJCA

Previous Name Information

Act Loc	Receive Date	Handler Name

Location Address Information

Act Loc	Street No.	Street	City	County	State	Zip	Land Type	State District
NJ	699	RTE 46 E	TETERBORO	BERGEN	NJ	07608	P	METRO

Mailing Address Information

Act Loc	Street No.	Street	City	State	Zip
NJ	699	RTE 46 E	TETERBORO	NJ	07608

Contact Information

Act Loc	Type	Title	First Name	Last Name	Phone	Street	City	State	Zip
NJ	A	MGR PLANT ENGR	WILLIAM	HOOPER	201-288-2000	RTE 46	TETERBORO	NJ	07608
NJ	N	HS&E MGR	LOU	DUFLER	201-393-3810	699 RTE 46 E	TETERBORO	NJ	07608

Owner Information

Act Loc	Seq	Indicator	Type	Change Date	Owner/Operator Name	Phone	Street	City	State	Zip
NJ	1	PO	P	6/11/1986	THE BENDIX CORP	201-288-2000	RTE 46	TETERBORO	NJ	07608
NJ	2	CO	P		HONEYWELL INTL DEFENSE & AVONICS	201-393-2900	699 RTE 46 E	TETERBORO	NJ	07608

Operator Information

Act Loc	Seq	Indicator	Type	Change Date	Owner/Operator Name	Phone	Street	City	State	Zip
NJ	2	CP	P		THE BENDIX CORP	201-288-2000	RTE 46	OPERCITY	NJ	99999

Miscellaneous Information

Act Loc	Previous Id	Second Id	Act Flag	Act Date	Rhrr Basin	TSD Date	Non-notifier	Off-site receipt	Accessibility
NJ				2/28/2000		7/23/1990			

Location Coordinates

Act Loc	Source	Latitude Measure	Longitude Measure
NJ	A	40 51 38.4	074 03 49.8

Environmental Priority Ranking

Act Loc	EPR Date	EPR Status	EPR Notes

SIC Information

Act Loc	Seq	Source	Code	Primary
NJ	0001	R	3761	P
NJ	0002	R	3811	S
NJ	0003	R	3728	S
NJ	0004	R	3862	S

Other Permit Information

Act Loc	Number	Type	Permit Description
NJ	31090000005	O	
NJ	31090027002	O	
NJ	NE7310900004	P	
NJ	NJ-00-5002	V	
NJ	NJ0002297	N	
NJ	NJCFD0004	S	
NJ	NJCFG0339	S	
NJ	NJD078714433	R	
NJ	RCRA-CHJ00157	E	

Activity Summary Information

Act Loc	Source	Seq	Receipt Date	Gen - Fed Reg	Trans - Fed Reg	TSD - Fed Reg	HW Fuel - Fed Reg	Used Oil - Fed Reg	LDC	Recy
NJ	A	1	11/19/1980	-	-	N - N	-	-		
NJ	E	1	12/31/1979	LOG - R	-	-	-	-		
NJ	N	1	2/17/2000	LOG - R	-	-	-	-		

Hazardous Waste Stream Information

Act Loc	Sequence	Source	Date	Amount	Unit of Measure/Desc
NJ	0001	A	11/19/1980	1498.678	F
NJ	0002	A	11/19/1980	24.494	M
NJ	0003	A	11/19/1980	8.934	M
NJ	0004	A	11/19/1980	4.535	M
NJ	0005	A	11/19/1980	4.535	M
NJ	0006	A	11/19/1980	54.432	M
NJ	0007	A	11/19/1980	2.268	M
NJ	0008	A	11/19/1980	999.112	P
NJ	0009	A	11/19/1980	181.44	M
NJ	0010	A	11/19/1980	17.974	P
NJ	0011	A	11/19/1980	149.868	P
NJ	0004	M	2/17/2000	C	

Go To

State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
Lance R. Miller, Acting Director
CN 028
Trenton, N.J. 08625-0028
(609) 633-1408

ENVIRONMENTAL PROTECTION AGENCY REGION II
90 JAN 31 AM 11:55
HAZARDOUS WASTE FACILITIES BRANCH

JAN 29 1990

Mark S. Schwind
Environmental Engineer
Allied-Signal Aerospace Company
Guidance Systems Division
Teterboro, New Jersey 07608

RE: Less Than Ninety (90) Day Accumulation of Hazardous Waste in Above-Ground Tanks, Allied-Signal Aerospace Company, Guidance Systems Division, Teterboro, EPA ID No. 078 714 433, TS-90-2

Dear Mr. Schwind:

The Bureau of Hazardous Waste Engineering (Bureau) is in receipt of your letter dated January 15, 1990, requesting approval for less than ninety (90) day accumulation of hazardous waste in a five thousand (5,000) gallon above-ground fiberglass tank. Your submittal is deficient and the following information in accordance with N.J.A.C. 7:26-9.3(b) must be submitted to the Bureau prior to approval:

1. Tank Shell Thicknes:

   Provide information about integrity assessment method used for shell thickness. Also, explain how the shell thickness data was obtained.

2. All engineering drawings and calculations must be signed and sealed by a New Jersey Licensed Professional Engineer.

Enclosed with this letter is a guidance document TG-5 to help you to prepare the submittal for a less than 90 day accumulation tank approval. Please submit the required information to the Bureau within thirty (30) days from the date of this letter.

JAN 29 1990

If you have any further questions, please call Mr. Yefim Kantor of my staff at (609) 292-9880.

Very truly yours,

Thomas Sherman

Thomas Sherman, Chief
Bureau of Hazardous Waste Engineering

EP11/cfd
Attachments

c: Barry Tornick, USEPA (without attachments)
Yacoub Yacoub, BME (without attachments)

DOCUMENT: ALLIED
FOLDER: CFDMOB

AETC
ADVANCED ENVIRONMENTAL® TECHNOLOGY CORPORATION

PACKING SLIP

©1985 AETC

NJ 14677 #1
CONTAINER #

DATE SHIPPED: 3/2/89
DATE ACCUMULATED:

GENERATOR: ALLIED SIGNAL AEROSPACE
DOT PROPER SHIPPING NAME: WASTE SODIUM AZIDE

ADDRESS: LT UG MAILSTOP 1/2U
HAZARD CLASS: POISON B
UN/NA: 1687

CITY/STATE: TETERBORO, NJ. 07608
DISPOSAL CODE: B.D.T.
GROUP:

EPA ID#: NJD078714433
MANIFEST#: NJA0480657
EPA CODE: 11/D105
CONTAINER TYPE: 5GAL DM 17-C

MANIFEST PAGE NO. 1 LINE ITEM NO. A
COMMON 1 DRUMS

UNIT	CONTAINER SIZE	NET WEIGHT	CHEMICAL NAME (page 1 of 1)	WASTE TYPE
1	500gm	2.0	SODIUM AZIDE	
			D	
		2.0 (g)		

TOTAL NET WEIGHT 12.0

TECHNICAL SUPERVISOR: Ced

INITIAL

W/16S

PHASE I UNKNOWN)

AETC
ADVANCED ENVIRONMENTAL TECHNOLOGY CORPORATION

Reactive Chemical Group

Shipping/Receiving

Worksheet # NJ 14967
P.O. #
Date 3/2/89

Company: Allied Signal Aerospace
Address: Rt. 46 Mailstop 1/24
City/State: Teterboro, NJ 07608

Destination: A.E.T.C.
Transporter: E.T.C.
Placard: None

CONTAINER SIZE	NET WEIGHT	GROSS WEIGHT	DISPOSAL CODE	AETC PRODUCT CODE	DESCRIPTION
					Crew finished Phase I of Unknowns
					Sampled a total of 89 Unknowns.

	TOTAL PALLETS / TOTAL PIECES	TOTAL GROSS WEIGHT SUBJECT TO CHANGE BY SCALE

DATE	TIME IN	TIME OUT	LUNCH
R.	1:30	1:45	No
R.	"	"	"
Jeff St.	"	"	"

TRAVEL TIME ROUND TRIP: 2½ ART
MILEAGE ROUND TRIP: 80 ART
OVERNIGHT TRAVEL:

REGION	NUMBER OF NIGHTS
NEW ENGLAND	
OTHER	
TEMPERATURE SENSITIVE	

MATERIALS		
VERMICULITE	10936	
17-C 55 GALLON PAIL	11004	
21-C 30 GALLON FIBER	10919	
17-H 55 GALLON DRUM	10900	
17-E 55 GALLON DRUM	10903	
15A WOOD	10926	2
12A50 FIBER	10923	3
12A60 FIBER	10922	
12A80 FIBER	10921	
12B15 FIBER	10928	
1.5 GAL METAL O.P.	11006	
1 GAL POLY O.P.	11010	
1 LITER POLY O.P.	11008	
1 QT. POLY	11009	
1 PT. POLY O.P.	11007	
1 GAL GLASS JUG	11014	
21-C 12 GALLON FIBER	11028	

MANIFEST NUMBER: None PAGE(S)

TYPE OF WORK PERFORMED

		CASE NUMBER
EMERGENCY RESPONSE		
MOBILIZATION		
NEUTRALIZATION		
EQUIPMENT LEVEL A B C D		HOURS
SPECIAL EVENT		

MATERIALS / EQUIPMENT

TRAUZL BLOCK	10714

COMMENTS

I the undersigned having full authority to execute this document on behalf of said company (Generator), confirm that Advanced Environmental Technology Corporation (A.E.T.C.) has been contracted to perform waste packaging and or waste removal services and has satisfactorily documented and completed these services for which they were hired. Therefore as the authorized representative of the contracting company (Generator) I guarantee full and prompt payment to A.E.T.C. for services rendered.

Company (Generator) Authorized Representative

A.E.T.C. Authorized Representative

WBL-1

CUSTOMER COPY

FOR HELP IN CHEMICAL EMERGENCIES INVOLVING SPILL, LEAK, FIRE OR EXPOSURE CALL TOLL-FREE 1-800-424-9300 DAY OR NIGHT

THIS MEMORANDUM

is an acknowledgement that a bill of lading has been issued and is not the Original Bill of Lading, nor a copy or duplicate, covering the property named herein, and is intended solely for filing or record.

Shipper's No. NJ14697

Carrier's No.

Environmental Transfer Corp. (NAME OF CARRIER) SCAC Date 3/2/89

TO: Consignee Advanced Environmental Technology Corp.
Street Cold mine Rd.
Destination Flanders, N.J. Zip 07836

FROM: Shipper Allied Signal Aerospace
Street Rt. 46 mail stop 1/24
Origin Teterboro, N.J. Zip 07608

Route: Direct via AETC

Vehicle Number XL80DK

No. Pkgs	HM	Kind of Packaging, Description of Articles (Hazardous Materials Proper Shipping Name)	Hazard Class	ID Number	Weight	Rate	Prepaid Collect
1		Flammable liquid, n.o.s.	Flammable liq	UN1993	10.0		Flammable liq
1		Corrosive liquid, n.o.s.	Corrosive material	UN1760	10.0		Corrosive
1		Hazardous substance liquid, n.o.s.	ORM-E	NA9188	10.0		ORM-E
1		Alkaline (corrosive) liquid, n.o.s.	Corrosive material	NA1719	10.0		Corrosive
3		Hazardous substance solid, n.o.s.	ORM-E	NA9188	30.0		ORM-E

Remit C.O.D. to:
Address:
City: State: Zip:

COD Amt: $

C.O.D. FEE: Prepaid ☐ Collect ☐ $

NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding

$ _____ Per _____

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

Signature of Consignor

FREIGHT CHARGES PREPAID ☐ COLLECT ☐

RECEIVED, subject to the classifications and tariffs in effect on the date of issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.
Per _____

PLACARDS REQUIRED

SPECIAL INSTRUCTIONS:

PLACARDS SUPPLIED ☐ YES ☐ NO — FURNISHED BY CARRIER
DRIVERS SIGNATURE: TRANSFER

SHIPPER: Allied Signal Aerospace
PER:
DATE: 3/2/89

CARRIER: Environmental Transfer Corp
PER: [illegible]
DATE: 3/2/89

FORM # S-BLS-C (4 PLY) REV. 10/86

CONTAINS HAZARDOUS MATERIALS

FOR HELP IN CHEMICAL EMERGENCIES INVOLVING SPILL, LEAK, FIRE OR EXPOSURE CALL TOLL-FREE 1-800-424-9300 DAY OR NIGHT

STATE OF CONNECTICUT

DEPARTMENT OF ENVIRONMENTAL PROTECTION

Hazardous Waste MANIFEST SECTION, State Office Building, Hartford, CT 06106

203-566-4869

PLEASE PRINT OR TYPE (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. N.J.D.0.7.8.7.1.4.4.3.3 — Manifest Document No. 0.0.0.2.6

2. Page 1 of 1

Information in the shaded areas is not required by Federal law, but may be required by State law

3. GENERATOR'S Name and Mailing Address
ALLIED-BENDIX AEROSPACE - TETERBORO FACILITY
ROUTE 46, TETERBORO, N.J. 07608

4. GENERATOR'S Phone (201) 393-2724 CTD000636498

A. State Manifest Document Number: CT B 0075809

B. State Gen. ID: SAME

5. TRANSPORTER 1 Company Name: [redacted] TRI-S., Inc.

6. US EPA ID Number: [redacted]

C. State Tran. ID: [redacted]

D. Tran. Phone: 203 [redacted] 875-2110

7. TRANSPORTER 2 Company Name

8. US EPA ID Number

E. State Tran. ID

F. Tran. Phone

9. DESIGNATED FACILITY Name and Site Address
ENVIRITE CORPORATION
OLD WATERBURY ROAD
THOMASTON, CT 06787

10. US EPA ID Number: CTD093616613

G. State Facility's ID: SAME

H. Facility's Phone: [redacted]

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	[illegible]
a. HAZARDOUS WASTE LIQUID, N.O.S. (CH04) ORM-E NA 9189	0.0.1	T.T	0.0.1.7.6	G	[illegible]
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above
- L/T WATER 97%
- SODIUM HYDROXIDE,
- PHOSPHORIC ACID & FORMALDEHYDE

K. Handling Codes for Wastes Listed Above
a. S02-T01
b.

15. SPECIAL HANDLING Instructions and Additional Information

N.J. HAZARDOUS WASTE TRANSPORTER # NJ 26441

TOTAL DRUMS PUMPED OUT: 5

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and all applicable State laws and regulations.

Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.

Printed/Typed Name: JOHN J. LONERGAN — Signature: [signature] — Date (Month Day Year): 10-8-87

17. TRANSPORTER 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: JIM VEILLETTE — Signature: Jim Veillette — Date (Month Day Year): 10-8-87

18. TRANSPORTER 2 Acknowledgement of Receipt of Materials

Printed/Typed Name — Signature — Date (Month Day Year)

19. DISCREPANCY Indication Space

20. FACILITY OWNER OR OPERATOR: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19

Printed/Typed Name: Daniel P. Fleming — Signature: Daniel P. Fleming — Date (Month Day Year): 10-8-87

GENERATOR — TRANSPORTER — FACILITY

IN THE EVENT OF A SPILL CONTACT THE NATIONAL RESPONSE CENTER, U.S. COAST GUARD 1-800-424-8802. FOR SPILLS WITHIN CONNECTICUT, CONTACT CT DEP - OIL AND CHEMICAL SPILLS AT (203) 566-3338

EPA Form 8700-22 Rev. 3-86 — Form Approved. OMB No. 2050-0039 Expires 9-30-88. Previous edition is obsolete.

COPY 3: GENERATOR COMPLETED COPY

NONHAZARDOUS CERTIFICATION

This is to certify that metal hydroxide sludge *waste received* August 12, 1987 *from* Bendix Corporation *on manifest # CTB 0075809 has been rendered nonhazardous in full compliance with the terms of Envirite Corporation's delisting petition granted by the U.S. EPA November 6, 1986.*

Having changed this hazardous waste into a nonhazardous material, Envirite Corporation has eliminated all Bendix Corporation *future hazardous waste liability for this material under RCRA (Resource Conservation and Recovery Act of 1976).*

Geoffrey Stengel, Jr.
President

Operations Manager

ENVIRITE

Corporate Headquarters
Plymouth Meeting, Pennsylvania 19462

... requirements of Consolidated Freight Classification. Lading approved by the Interstate Commerce Commission

STRAIGHT BILL OF LADING - SHORT FORM

Shipper's B/L No. F 509174

Carrier: *(RECEIVED, subject to the classification and tariffs in effect on the date of the issue of this Bill of Lading).*

Carrier's No.

At Teterboro, N.J. 8-12 19 87 From: ALLIED CORPORATION • BENDIX AEROSPACE BENDIX FLIGHT SYSTEMS DIVISION • TETERBORO, N.J. 07608

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated below, which said company (the word company being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own road or its own water line, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the conditions not prohibited by law, whether printed or written herein contained, including the conditions on back hereof, which are hereby agreed to be the shipper and accepted for himself and his assigns.

Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to be the shipper and accepted for himself and his assigns.

Consigned to
ENVIRITE

Destination: Thomaston CT | State | County

Delivery Address (To be filled in only when shipper desires and governing tariffs provide for delivery thereat)

Route

Delivering Carrier: Tri-S | Car or Vehicle Initials | No.

Boxes	Cartons	Drums	Description of Articles	★ Weight
			ELECTRICAL INSTRUMENTS-NOIBN, In Innercontainers	
			MOTORS OR MOTOR PARTS-Electric, NOIBN	
			MACHINE PARTS-NOIBN Iron & Steel	
			MACHINERY, NOIBN	
			Hazardous Waste Liquid	
			NOS (Pyro + Electroless	
			Copper)	
			Total Gallons: 176	

Subject to Section 7 of Conditions of applicable bill of lading, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.
(Signature of consignor)

If charges are to be prepaid, write or stamp here, "To be Prepaid."

Received $ to apply in prepayment of the charges on the property described hereon.

Agent or Cashier

Per
(The signature here acknowledges only the amount prepaid.)

Charges Advanced $

Shipper Number(s): | Sales Order Number(s): | Case Number(s): | Customer Order Number(s):

★ If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight. NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.

The agreed or declared value of the property specifically stated by the shipper to be not exceeding _____ per _____

Permanent post-office address of shipper: | Per | Agent | Per

Please show our Bill of Lading Number on your freight bills. Send PREPAID freight bills in DUPLICATE.

Allied Corporation • Bendix Aerospace
Bendix Flight Systems Division, Teterboro, N.J. 07608

1 - Original - Not Negotiable

Form 10324/4

BARON BLAKESLEE

49 CENTRAL AVENUE

KEARNY, NEW JERSEY 07032

PACKING LIST

ALLIED BENDIX AEROSPACE
TETERBORO FACILITY 07608

[redacted]

13 [~~10~~] USED TRICHLOROETHANE x 55 gallon

[2] USED FREON x 55 gallon

[1] methylene chloride x 55 gallon

Total 16 x 55 gallon Drums

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: May 6, 1982

SUBJECT: RCRA Inspection Forms

FROM: Richard D. Spear, Chief
Surveillance and Monitoring Branch

TO: Richard A. Baker, Chief
Permits Administration Branch

THRU: Barbara Metzger, Director
Environmental Services Division

The enclosed RCRA Inspection Forms have been completed by the Edison Office of the U.S. Environmental Protection Agency:

New Jersey

Inmont Corp.
P.O. Box 328
Belvidere, N.J.
NJD082988056

Bendix Corp.
Route 46
Teterboro, N.J.
NJD078714433

2 Enclosures

EPA Form 1320-6 (Rev. 3-76)

NJ 0018714433

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II
26 FEDERAL PLAZA
NEW YORK, NEW YORK 10278

cc GAD

JUL 7 1982

Kenneth A. Wallach
Regional Counsel
Aerospace Electronics Group
The Bendix Corporation
Teterboro, New Jersey 07608

Dear Mr. Wallach:

I am writing to confirm the terms of our telephone conversation. As we agreed, the date by which you must respond to the letter of June 15, 1982 is hereby extended to September 10. Should you have any questions before that time please feel free to contact me.

Sincerely yours,

Bruce R. Adler
Attorney
General Enforcement Branch
Enforcement Division

Financial [illegible]

Form Dist FILE

New Jersey Department of Environmental Protection
Bureau of Water and Hazardous Waste Enforcement
RCRIS NOTIFICATION DATA DISCREPANCY FORM

Information from RCRIS	New Information (make change to "S" record only)
Facility Name: Allied Signal Aerospace	Facility Name: Allied Signal Defense & Space Systems
Facility EPA ID Number: NJD 078 714 433	Facility EPA ID Number: Same
Facility Address: Route 46	Facility Address:
City: Teterboro St: NJ Zip: 07608	City: Same St: Same Zip: Same
Mailing Address: Same	Mailing Address:
City: St: Zip:	City: St: Zip:
Facility Contact: Phone:	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) Same

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

General Generator Information:

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

Add/Change Generator Status Codes:

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

C	#	
	6	No longer Generates HW;
	7	No longer Generates HW;
	8	Never Generated Hazardous Waste
	9	ID Number to Transport
	1	Regulated Under Another ID Number(s)

Contact: Phone:

Effective Date of Change:

4/28/98

RCRA Supervisor — Date

Bureau of Water & HW Enforcement

TOTAL P.04

71

AlliedSignal
AEROSPACE

AlliedSignal Inc.
Guidance & Control Systems
Teterboro, NJ 07608-1173

201 288 2000

5/17

United States Environmental Protection Agency
Hazardous Waste Compliance Branch
Region II
290 Broadway
22nd Floor
New York, New York 10007-1866

May 15, 1995

Attn: Ms Jessica Gottlieb

Re: AlliedSignal Aerospace
EPA ID. No: NJD078714433
Request for AlliedSignal Aerospace Response Letter to EPA dated, March 8, 1995

Dear Ms Gottlieb:

Please find enclosed a copy of AlliedSignal Aerospace's response letter to the Environmental Protections Agencies letter, dated February 21, 1995, concerning the missing LandBan Disposal Notifications.

I apologize for the delay in responding to your request, however due to business realignment, I was unable to respond sooner.

Please be advised, that as part of AlliedSignal Aerospace Manifest program it will be the responsibility of the person signing the Manifest to ensure that all the proper paper has been obtained for the file. It is believed, that upon photocopying the manifest that the person signing did not ensure that he had obtained all the necessary file documentation.

AlliedSignal Aerospace thanks the Agency for it's cooperation in this matter and if there are any questions, please do not hesitate to contact the undersigned at 201-393-2452.

Sincerely,

Mark S. Schwind
Staff Environmental Engineer

AlliedSignal
AEROSPACE

AlliedSignal Inc.
Guidance & Control Systems
Teterboro, NJ 07608-1173

201 288 2000

U.S. EPA, Region II
290 Broadway
New York, NY 10007-1866

8 March 1995

Dear Sirs:

AlliedSignal Aerospace, EPA ID # NJD078714433, regrets that it neglected to include copies of four land disposal restrictions in its Hazardous Waste Manifest files for 1992, as noted in an EPA letter dated 21 February 1995.

In order to correct this error, we have procurred these LDR's and incorporated them into our files. Attached are copies of manifests NJA 0996947, NJA 0996961, NJA 0996964, and ILO 3412239, and the LDR for each.

We hope that this action satisfies the Agency in regard to the noted violation of 40 C.F.R. Part 268. If you have any further questions or comments, please contact the undersigned. Thank you.

Sincerely,

Daniel P. White

Daniel P. White
Environmental Scientist

AlliedSignal
AEROSPACE

FACSIMILE COVER SHEET

PLEASE DELIVER THE FOLLOWING PAGE(S) TO:

NAME: Ms Jessica Gottlieb

FIRM: Environmental Protection Agency

FAX NO: (212) 637-4437

FROM:

NAME: MARK SCHWIND

DEPT: ALLIEDSIGNAL ENVIRONMENTAL

EXT: 201-393-2452

FAX: 201-393-6553

MESSAGE: Hardcopy will follow

TOTAL NO. OF PAGE(S) 14 **INCLUDING COVER SHEET.**

TRANSMITTED BY (INITIALS): MS **DATE:** 7/7/95

NOTE: IF ALL PAGES HAVE NOT BEEN PROPERLY RECEIVED, PLEASE CALL 201-393-2452 - MARK

7/7 received JS

AlliedSignal
AEROSPACE

AlliedSignal Inc.
Guidance & Control Systems
Teterboro, NJ 07608-1173

201 288 2000

United States Environmental Protection Agency
Hazardous Waste Compliance Branch
Region II
290 Broadway
22nd Floor
New York, New York 10007-1866

July 7, 1995

Attn: Ms Jessica Gottlieb

Re: AlliedSignal Aerospace
EPA Id No: NJD078714433
EPA Letter dated June 15, 1995

Dear Ms Gottlieb:

AlliedSignal Aerospace is in receipt of and has reviewed your letter dated June 15, 1995, concerning the LandBan Disposal Notifications (LDRs). Please be advised, that these are the LDR notices that were attached to the Manifests that were sent with the hazardous waste shipments. It is noted, that these LDRs were obtained from the Treatment Storage Disposal Facilities to where the waste was shipped and received, in order to complete AlliedSignal Aerospace files.

Accordingly, attached for your review are the fax cover sheets from the TSDFs as they were faxed to AlliedSignal Aerospace in order to comply with EPA's retention policy. In addition, it is noted that the Environmental Protection Agency may contact the TSDFs to confirm these were the LDRs that were sent with the shipment. To facilitate in the ability to contact these facilities the following information is provided:

Facility: Phibrotech, Inc.
10 Industry Avenue
Joliet, Illinois 60435

Phone: (815) 727-3010
Fax: (815) 727-3010

Contact: Carolyn

Facility: Marisol Inc.
125 Factory Lane
Middlesex, New Jersey

Phone: (908) 469-5100
Fax: (908) 469-2761

Contact: Joann Kohl

In addition, the following explanation is provided to EPA why the Manifest Number was crossed out and initialed on the LDR:

1. For manifest number IL3412239 - Originally a New Jersey manifest was going to be used to ship the hazardous waste to Illinois. However, a Illinois manifest was provided by the facility to be used in this shipment. The LDR was changed to reflect this manifest change.

2. For manifest number NJA0996961 and NJA0996964 - Since AlliedSignal Aerospace did not have continuation sheets a separate manifest was used to facilitate in the shipment of one additional drum to the disposal site. For manifest number NJA0996964 the numbers were reversed 46 instead of 64, which was changed and initialed to reflect the appropriate manifest number and for manifest number NJA0996961 a photocopy was made of NJA0996964 LDR, prior to signature, the manifest number was changed and initialed to reflect the appropriate manifest number.

Allied Signal Aerospace trusts this explanation meets with Environmental Protection Agencies approval and if there are any questions, please do not hesitate to contact the undersigned at (201) 393-2452.

Sincerely,

Mark S. Schwind
Staff Environmental Engineer

Attachments

PHIBRO-TECH, INC.

FACSIMILE COVER PAGE

TO: Jeff
Allied - Signal Aerospace Co

FACSIMILE: 201-393-6553

TELEPHONE:

FROM: Carolyn

FACSIMILE: (815)727-7545

TELEPHONE: (815)727-3010 OR (815)727-4445

DATE: 5-17-93

NO. OF PAGES (INCL. COVER): 2

[✓] As you requested
[ ] For your information
[ ] Please call when received
[ ] Reply requested

COMMENTS:
Here Bill for Manufacturer # 341-2239

10 INDUSTRY AVENUE · JOLIET, ILLINOIS 60435 · (815) 727-3010 · FAX (815) 727-7545

State of New Jersey
Department of Environmental Protection
Division of Hazardous Waste Management
Manifest Section
CN 028, Trenton, NJ 08625

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039 Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. NJD071441933 — Manifest Document No.

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

A. State Manifest Document Number: NJA 0996961

B. State Generator's ID: SAME

C. State Trans. ID: NJDEPS-[illegible]

D. Transporter's Phone: (908) 469-5100

E. State Trans. ID:

F. Transporter's Phone ( )

G. State Facility's ID

H. Facility's Phone: (908) 669-5100

3. Generator's Name and Mailing Address
ALLIED-SIGNAL AEROSPACE COMPANY
ROUTE 46 TETERBORO, NJ 07608

4. Generator's Phone (201) 393-2724

5. Transporter 1 Company Name: MARISOL INCORPORATED — 6. US EPA ID Number: NJD099345444

7. Transporter 2 Company Name — 8. US EPA ID Number:

9. Designated Facility Name and Site Address
MARISOL INCORPORATED
125 FACTORY LANE
MIDDLESEX, NJ 08846 — 10. US EPA ID Number: NJD099345444

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt./Vol.	I. Waste No.
a. RQ WASTE 1-1-1 TRICHLOROETHANE, ORM-A, F-001, UN 2831	X	012	DM		G	F001
b. RQ WASTE METHYLENE CHLORIDE, ORM-A, F-001, UN 1593	X	001	DM		G	F001
c. HAZARDOUS WASTE LIQUID, N.O.S., (TRIFLUORO-TRICHLOROETHANE), ORM-E, NA 9189	X	002	DM		G	F001
d. RQ TRICHLOROETHYLENE, ORM-A, F-001, UN 1710	X	002	DM		G	F001

J. Additional Descriptions for Materials Listed Above
a. L/T: 1,1,1 TRICHLOROETHANE 100%
b. L/T: METHYLENE CHLORIDE 100%
c. L/T: TRIFLUOROTRICHLOROETHANE 100%
d. L/T: TRICHLOROETHYLENE 100%

K. Handling Codes for Wastes Listed Above
a. T04 c. T04
b. T04 d. T04

15. Special Handling Instructions and Additional Information
MATERIAL TO BE BENEFICIALLY RECLAIMED ACCORDING TO ASAC WASTE MINIMIZATION PLAN. IN CASE OF EMERGENCY, THE 24 HOUR RESPONSE INFORMATION TELEPHONE IS CHEMTREC 1-800-424-9300, AND REFER TO ATTACHED DOT RESPONSE GUIDE.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: MARK SCHWIED — Signature — Month Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name — Signature — Month Day Year

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name — Signature — Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name — Signature — Month Day Year

GENERATOR — TRANSPORTER — FACILITY

NJA 0996961

EPA Form 8700-22 (Rev. 6/86) Previous editions are obsolete.

SIGNATURE AND INFORMATION MUST BE LEGIBLE ON ALL COPIES

6 — GENERATOR COPY

State of New Jersey
Department of Environmental Protection
Division of Hazardous Waste Management
Manifest Section
CN 028, Trenton, NJ 08625

Use type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. NJD077831443312012 — Manifest Document No.

2. Page 1 of 1 — Information in the shaded areas is not required by Federal law.

A. State Manifest Document Number: NJA 0996964

3. Generator's Name and Mailing Address
ALLIED-SIGNAL AEROSPACE COMPANY
ROUTE 46 TETERBORO, NJ 07608

B. State Generator's ID: SAME

4. Generator's Phone (201) 393-2724

5. Transporter 1 Company Name: MARISOL INCORPORATED — 6. US EPA ID Number: NJD012455454

C. State Trans. ID: NJDEPS-[illegible]

7. Transporter 2 Company Name — 8. US EPA ID Number

D. Transporter's Phone (908) 469-5300

E. State Trans. ID

9. Designated Facility Name and Site Address
MARISOL INCORPORATED
125 FACTORY LANE
MIDDLESEX, NJ 08846 — 10. US EPA ID Number: NJD012455454

F. Transporter's Phone ( )

G. State Facility's ID

H. Facility's Phone (908) 469-5300

	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	X	RQ HAZARDOUS WASTE LIQUID, N.O.S., (TRICHLOROETHANE), ORM-E, F-001, UN 2831	01	DM	00055	G	F001
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above
L/T: WATER 99%
a. TRICHLOROETHANE 1%
b.
c.
d.

K. Handling Codes for Wastes Listed Above
a. T04
b.
c.
d.

15. Special Handling Instructions and Additional Information
IN CASE OF EMERGENCY, THE 24 HOUR RESPONSE INFORMATION TELEPHONE IS CHEMTREC 1-800-424-9300, AND REFER TO ATTACHED DOT RESPONSE GUIDE.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: MARK SCHMIND — Signature — Month Day Year: 11 16 92

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name — Signature — Month Day Year

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name — Signature — Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name — Signature — Month Day Year

NJA 0996964

EPA Form 8700-22 (Rev. 9/88) Previous editions are obsolete.

SIGNATURE AND INFORMATION MUST BE LEGIBLE ON ALL COPIES

MARISOL INC.
SOLVENT RECYCLING

TELECOPIER COVER LETTER

Date: 5-17-94

PLEASE DELIVER THE FOLLOWING PAGES TO:

Name: JeFF ELLS
Firm: Allied Signal Aerospace
Address:
Fax: 201-393-6553
Telephone:

FROM:

Name: JOANN KOHL
Firm: Marisol Incorporated
Department: Environmental / Data Processing
Address: 125 Factory Lane
Middlesex, New Jersey 08846
Telephone: (908) 469 - 5100
Fax: (908) 469 - 2761

We sent 5 pages including the cover letter. Thank you!

Ret your request Please Find LDR's For both manifest No.'s NJA0996964 + NJA099696 received by Marisol on 06/08/ I have mailed you hard co

Joann Kohl.

c:\messages\ccs-lrs\ldrsent.sls

Marisol Incorporate
125 Factory Lane
Middlesex, N.J. 08846

This notice is being sent to you in accordance with 40 CFR 268.7 to inform you that this shipment contains the solvents identified below which are restricted from landfill. You should be aware that the residues from the treatment of these materials may not be landfilled unless the concentration is below the applicable non-wastewater treatment standard(s).

Manifest contains the following EPA Hazardous Waste Numbers: (check box[es])

F001-> [X] F002-> [ ] F003-> [ ] F004-> [ ] F005-> [ ]

The following materials are contained in the waste stream:

	MATERIAL	NON-WASTEWATER TREATMENT STANDARD (mg/l)
	Acetone	0.590
	Benzene	3.700 (total)
	n-Butyl Alcohol	5.000
	Carbon Disulfide	4.810
	Carbon Tetrachloride	0.960
	Chlorobenzene	0.050
	Cresols (and Cresylic Acid)	0.750
	Cyclohexanone	0.750
	1,2 Dichlorobenzene	0.125
	2-Ethoxyethanol	Incineration
	Ethyl Acetate	0.750
	Ethyl Benzene	0.053
	Ethyl Ether	0.750
	Isobutanol	5.000
	Methanol	0.750
X	Methylene Chloride	0.960
	Methyl Ethyl Ketone	0.750
	Methyl Isobutyl Ketone	0.330
	Nitrobenzene	0.125
	2-Nitropropane	Incineration
	Pyridine	0.330
	Tetrachloroethylene	0.050
	Toluene	0.330
X	1,1,1-Trichloroethane	0.410
	1,1,2-Trichloroethane	7.600 (total)
X	1,1,2-Trichloro-1,2,2-Trifluoroethane	0.960
X	Trichloroethylene	0.091
	Trichlorofluoromethane	0.960
	Xylene	0.150

[illegible] [illegible] **PLEASE REVIEW BOTH SIDES!**

LAND DISPOSAL RESTRICTION NOTICE

In accordance with 40 CFR 268.7 this notice is to inform you that these wastes are restricted from land disposal unless they are treated: 1.) to below the treatment standards specified in 268.41 or 2.) in accordance with the technology-based standard defined in 268.42, namely, FSUBS (Fuel substitution), INCIN (Incineration) and/or RORGS (Recovery of organics).

The wastes are:

	D001		U080		U196
	D002		U083		U203
	U001		U084		U208
	U002		U085		U209
	U003		U088		U210
	U004		U092		U211
	U008		U102		U213
	U009		U107		U220
	U012		U108		U225
	U019		U110		U226
	U028		U112		U227
	U031		U113		U228
	U037		U117		U239
	U043		U118		U328
	U044		U121		U353
	U051		U122		U359
	U052		U124	X	D040
	U053		U125		
	U054		U140		
	U055		U152		
	U056		U154		
	U057		U159		
	U069		U161		
	U070		U162		
	U071		U169		
	U072		U171		
	U076		U186		
	U077		U188		
	U078		U191		
	U079		U194		

GENERATOR NOTIFIED

GENERATOR Allied Signal Aerospace MANIFEST No. MS [redacted] 996961

SIGNATURE [signature] DATE 6/9/92

Marisol Incorporate
125 Factory Lane
Middlesex, N.J. 08846

This notice is being sent to you in accordance with 40 CFR 268.7 to inform you that this shipment contains the solvents identified below which are restricted from landfill. You should be aware that the residues from the treatment of these materials may not be landfilled unless the concentration is below the applicable non-wastewater treatment standard(s).

Manifest contains the following EPA Hazardous Waste Numbers: (check box(es))

F001-> [X] F002-> [ ] F003-> [ ] F004-> [ ] F005-> [ ]

The following materials are contained in the waste stream:

	MATERIAL	NON-WASTEWATER TREATMENT STANDARD (mg/l)
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	Benzene	3.700 (total)
	n-Butyl Alcohol	5.000
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	Carbon Tetrachloride	0.960
	Chlorobenzene	0.050
	Cresols (and Cresylic Acid)	0.750
	Cyclohexanone	0.750
	1,2 Dichlorobenzene	0.125
	2-Ethoxyethanol	Incineration
	Ethyl Acetate	0.750
	Ethyl Benzene	0.053
	Ethyl Ether	0.750
	Isobutanol	5.000
	Methanol	0.750
	Methylene Chloride	0.960
	Methyl Ethyl Ketone	0.750
	Methyl Isobutyl Ketone	0.330
	Nitrobenzene	0.125
	2-Nitropropane	Incineration
	Pyridine	0.330
	Tetrachloroethylene	0.050
	Toluene	0.330
X	1,1,1-Trichloroethane	0.410
	1,1,2-Trichloroethane	7.600 (total)
	1,1,2-Trichloro-1,2,2-Trifluoroethane	0.960
	Trichloroethylene	0.091
	Trichlorofluoromethane	0.960
	Xylene	0.150

LAND DISPOSAL RESTRICTION NOTICE

In accordance with 40 CFR 268.7 this notice is to inform you that these wastes are restricted from land disposal unless they are treated: 1.) to below the treatment standards specified in 268.41 or 2.) in accordance with the technology-based standards defined in 268.42, namely, FSUBS (Fuel substitution), INCIN (Incineration) and/or RORGS (Recovery of organics).

The wastes are:

_____ D001	_____ U080	_____ U196
_____ D002	_____ U083	_____ U203
_____ U001	_____ U084	_____ U208
_____ U002	_____ U085	_____ U209
_____ U003	_____ U088	_____ U210
_____ U004	_____ U092	_____ U211
_____ U008	_____ U102	_____ U213
_____ U009	_____ U107	_____ U220
_____ U012	_____ U108	_____ U225
_____ U019	_____ U110	_____ U226
_____ U028	_____ U112	_____ U227
_____ U031	_____ U113	_____ U228
_____ U037	_____ U117	_____ U239
_____ U043	_____ U118	_____ U328
_____ U044	_____ U121	_____ U353
_____ U051	_____ U122	_____ U359
_____ U052	_____ U124	_____
_____ U053	_____ U125	_____
_____ U054	_____ U140	_____
_____ U055	_____ U152	_____
_____ U056	_____ U154	_____
_____ U057	_____ U159	_____
_____ U069	_____ U161	_____
_____ U070	_____ U162	_____
_____ U071	_____ U169	_____
_____ U072	_____ U171	_____
_____ U076	_____ U186	_____
_____ U077	_____ U188	_____
_____ U078	_____ U191	_____
_____ U079	_____ U194	_____

GENERATOR Allied Signal Aerospace MANIFEST No. MD ~~JA 9996966~~ 096964

SIGNATURE [signature] DATE 6/8/92

LAND DISPOSAL RESTRICTION NOTICE

In accordance with 40 CFR 268.7 this notice is to inform you that these wastes are restricted from land disposal unless they are treated: 1.) to below the treatment standards specified in 268.41 or 2.) in accordance with the technology-based standards defined in 268.42, namely, FSUBS (Fuel substitution), INCIN (Incineration) and/or RORGS (Recovery of organics).

The wastes are:

	D001		U080		U196
X	D002		U083		U203
	U001		U084		U208
	U002		U085		U209
	U003		U088		U210
	U004		U092		U211
	U008		U102		U213
	U009		U107		U220
	U012		U108		U225
	U019		U110		U226
	U028		U112		U227
	U031		U113		U228
	U037		U117		U239
	U043		U118		U328
	U044		U121		U353
	U051		U122		U359
	U052		U124		
	U053		U125		
	U054		U140		
	U055		U152		
	U056		U154		
	U057		U159		
	U069		U161		
	U070		U162		
	U071		U169		
	U072		U171		
	U076		U186		
	U077		U188		
	U078		U191		
	U079		U194		

GENERATOR Allied Signal Aerospace MANIFEST No. [redacted] IL 3412239 WGB

SIGNATURE William A Hooper DATE 6-22-92

STATE OF ILLINOIS

ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL

P.O. BOX 19276 SPRINGFIELD, ILLINOIS 62794-9276 (217) 782-6761

FOR SHIPMENT OF HAZARDOUS, INFECTIOUS AND SPECIAL WASTE.

PLEASE TYPE (Form designed for use on elite (12-pitch) typewriter.) State Form LPC 62 6/81 IL532-0810 EPA Form 8700-22 (Rev. 9-88) Form Approved. OMB No. 2050-0039, Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. NJD078714433 Manifest Document No. 10993

2. Page 1 of 1

Information in the shaded areas is not required by Federal law, but is required by Illinois law.

3. Generator's Name and Mailing Address: Allied-Signal Aerospace Company, Route 46 Teterboro, NJ 07608

Location if Different:

4. Generator's Phone: 201 393-2724

A. Illinois Manifest Document Number: 3412239 MANIFEST FOR SHIPMENT

B. Illinois Generator's ID: 9340035417

C. Illinois Transporter's ID: 1540

D. Illinois Transporter's Phone: 312-100

E. Illinois Transporter's ID:

F. Illinois Transporter's Phone:

G. Illinois Facility's ID: 1970250002

H. Facility's Phone: 815-464-5

5. Transporter 1 Company Name: Freehold Carriage, Inc. 6. US EPA ID Number: NJD054176164

7. Transporter 2 Company Name 8. US EPA ID Number

9. Designated Facility Name and Site Address: CD Inorganics, 10 Industrial Ave., Joliet, IL 60436 10. US EPA ID Number: ILD062480850

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	Waste No.
a. RQ Waste Corrosive Liquid, N.O.S. (Cupric Chloride) (D002, D008) UN 1760, DOTE 9164	002	DF	0105	1	X D002
b. (RQ=100#) Waste Ammonium Hydroxide Solution Corrosive Liquid (D002) NA 2672	008	DF	0420	1	X D002
c.					
d.					

J. Additional Description for Materials Listed Above: A. Waste Cupric Chloride Solution per Response Order No. 60 which is part of our Program of Waste Minimization. B. 65% Ammonium Hydroxide 35% Water

K. Handling Codes for Wastes Listed Above: 1 = Gallons 2 = Cubic Yards

See Item 1.

15. Special Handling Instructions and Additional Information: In case of spill, Refer to attached DOT Response Guide No. 60, contact 24 hr. emergency response telephone # Chemtrec 1-800-424-9300.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: William A. Hooper Signature: William A. Hooper Date: Month Day Year 06 12 92

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: BOB SOMMERS Signature: Bob Sommers Date: Month Day Year 06 22 92

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name Signature Date: Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name: S. SAKOWSKI Signature: Date: Month Day Year 6 25 92

GENERATOR TRANSPORTER FACILITY

This Agency is authorized to require, pursuant to Illinois Revised Statutes, Chapter 111½ Section 21, that this information be submitted to the Agency. Failure to provide the information may result in a civil penalty against the owner or operator of not to exceed $25,000 per day of violation. Falsification of this information may result in a fine up to $50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

COPY 1. TSD MAIL TO GENERATOR

JUN 25 '92

TRANSMITTAL AND/OR MEMORANDUM			PHONE MESSAGE	
Comments	File	Approve and release	Wants you to call	Wants to see you
Note	Approved return	Return	Return your call	
To: Mr Tarconi		Phone message taken by	Time	Date: Nov 24, 1980
From: Bill Hooper		Phone No. (Include area code if necessary)		Extension(s)
Company Name or Dept. No.				

Message or Memorandum: Per our telecon. of today, Our Hazardous Waste Permit Application Part "A", forms 1 and 3 were mailed to Mr Ruisi in error. Please destroy cover letter Nov 12, attached to application and attach new cover letter dated Nov 19, 1980, along with the duplicate copy of our initial notification form enclosed herewith. Thank you

Sincerely Bill Hooper.

Form 1117/8 — The Bendix Corporation — IBM Z17739

COPY FOR YOUR INFORMATION

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

JUL 20 1995

Mr. Mark Schwind, Principal Environmental Engineer
Allied Signal Aerospace (Bendex)
Route 46
Teterboro, New Jersey 07608

Re: Allied Signal Aerospace (Bendex)
EPA I.D. No. NJD078714433

Dear Mr. Schwind:

Your submittal in response to the U.S. Environmental Protection Agency's (EPA) Notice of Violation dated February 21, 1995, has been deemed satisfactory. Your facility has been entered in our Data Management System as having achieved physical compliance with the violation cited in the above referenced letter. This matter can now be considered concluded and the enforcement action resolved.

Please be advised your facility is under the continuing obligation to comply with all the applicable state and federal regulations regarding the management of hazardous waste. Subsequently, if your facility should be found in violation of the regulation in the future, you may be subject to escalated enforcement action, including monetary penalties. If you have any questions, direct them to Ms. Jessica Gottlieb, at (212) 637-4148.

Sincerely yours,

Joel Golnmbek, Chief
NJ/Caribbean Compliance Section

cc: James K. Hamilton, Assistant Director
Office of Enforcement Policy
New Jersey Department of Environmental
Protection and Energy

bcc: Jessica Gottlieb

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JUL 21 12 47 PM '81
ENVIRONMENTAL PROTECTION AGENCY
NEW YORK, N.Y. 10007

Bendix

file

Guidance Systems Division

Teterboro, N.J. 07608
Tel (201) 288-2000
The Bendix Corporation

United States Environmental Protection Agency
Region II
26 Federal Plaza
New York, N.Y. 10278

Attn: Dr. Richard A. Baker

July 15, 1981

TT
26-WFB
8-WEB
7/27/81

RE: Status Report - Bendix Wastewater Treatment Works
NPDES Permit No. N.J. 0002097
EPA I.D. No. NJD078714433

Dear Mr. Baker:

This letter is to formally notify the U.S. Environmental Protection Agency, that the Bendix Corporation has completed construction of its new waste water treatment works, and the facility is now operational.

The effective date in which treatment of the effluent began, was April 21, 1981. At this time, our waste rinse water streams from the plating and printed circuit board manufacturing processes, comprising the 002 outfall, on our NPDES permit, were diverted from their previous method of treatment to the new system.

Bendix has found operation of the new system to date, to be most effective and flexible in its management. This was particulary noticeable in the system efficient disbursement in the addition of chemical feed, as compared to the effluent treatment need. Coupled with this, is its ease in permitting for numerous daily spot testing of constituent concentration in the effluent waste streams being treated. This flexibility in providing for continued fine tuning of the system plays an important role, both in the daily maintaining of parameters setforth by our NPDES permit, and in the required 24 hour composite samplings and analysis of the final effluent outflow for the bi-monthly DMR report.

The results from the daily spot testing and the 24 hour composite samplings have been most gratifying. Compliance with the EPA,

NPDES permit standards have been consistent. Enclosed is a copy of the April-May, DMR report documenting findings for that period.

Also enclosed is a recent analysis of the treated waste effluent just prior to its final PH adjustment. The analysis was performed by Aqua Survey Inc., in conjunction with Bendix's water conservation program, to determine the feasibility in recycling this effluent as rinse water for non-critical plating operations.

Based on the excellent results of this initial analysis, it is anticipated that with the possible addition of some suitable filtration, 60-70% of the final effluent may be recycled for rinse water usage.

Sludge disposal - this last remaining major concern in proving the system, has progressed very smothly. As part of the waste treatment system design; the liquid sludge from the sludge thickening tanks is pumped to a high pressure filter press. Here again, the results were very good, the press produced an extremely dry cake. and met the design criteria of 30 to 40% solids. It is this filter cake, comprising of heavy metal hydroxides which we will be disposing.

The first filter cake from the system was produced on June 3rd, 1981. Samples of the cake were forwarded to ECR/Lancy Laboratories for a complete analysis, to document contents for proper disposal in a recognized secured landfill area. (See attached analysis of sludge, ECR/Lancy report dated June 18, 1981).

ECR/Lancy report, evidenced that the sludge material met EPA's disposal criteria for secured landfill areas. Bendix, then solicited SCA Chemical Services, of Newark N.J., for its disposal. In this process, Bendix made formal application to the state of South Carolina, Department of Health and Environmental Control, Solid and Hazardous Waste Management Division, for permission to use and dispose of this material in SCA's secured landfill facility located at Pinewood S.C.. We are presently waiting approval of our application.

Bendix

Bendix thanks you again for your past cooperation and consideration during our construction phase, and extend their invitation to you and your staff to visit our waste treatment facility in the near future.

Very truly yours,

William A. Hooper

W. A. Hooper
Manager Plant Facilities

WAH/cam

cc: Thomas De Gaetano, EPA
D.W. Gabrielsen, Bendix
Dr. Paul Deroo, ERC/Lancy
G. George, Bendix

TROUT SURVEY, INC.

p. o. box 46 • the cane farm

rosemont, new jersey 08556

(609) 397-0666

Environmental Analysts

June 23, 1981

CLIENT:
Mr. G. Ritacco
Bendix Corp.
Route 46
Teterboro, N.J. 07608

DATE: 6/23/81
RECEIVED: 6/12/81
JOB NO: 1-417-81

JUL 21 12 18 PM '81
ENVIRONMENTAL PROTECTION AGENCY
NEW YORK, N.Y. 10007

LABORATORY ANALYSIS:

Parameter (ppm)		Re-Use Water	
Nitrate	1.0	Chromium	<.001
Phosphate, Ortho	.009	Copper	.04
Phosphate, Total	.013	Iron	.04
MBAS	.05	Lead	.005
Sulfate	34	Magnesium	7.5
Fluoride	.05	Mercury	<.002
Conductivity	510	Potassium	4.5
Suspended Solids	1	Silver	<.001
Volatile Solids	97	Sodium	35
Total Solids	289	Zinc	.02
Dissolved Oxygen	8.5		
Aluminum	.02		
Arsenic	<.001		
Barium	0.1		
Cadmium	<.01		
Calcium	51		

Omar Baturay
Laboratory Supervisor

OB/jk

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II
26 FEDERAL PLAZA
NEW YORK NEW YORK 10278

JUN 25 1982

Mr. William Hooper
Bendix Corporation
Route 46
Teterboro, NJ 07608

Re: Bendix Corporation
EPA Identification number: NJD078714433
Facility located at : Teterboro, New Jersey

Inspection performed on : April 8, 1982

Dear Sir or Madam:

The Environmental Protection Agency ("EPA") is charged with responsibility for implementing 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 ("RCRA"), 90 Stat. 2795, P.L. 94-580 (1976).]

In accordance with this responsibility, an inspection was performed at the above-referenced facility ('the facility") by a duly authorized representative of the EPA pursuant to Section 3007 of the Act. On the basis of this inspection, the Director of the Enforcement Division of the EPA Region II office has determined that you have violated Section 3005 of the Act, 42 U.S.C. §6925 and the regulations promulgated thereunder, as specified by the checked boxes on the following pages.

1. By notification you informed EPA that you conduct activities at the facility involving "hazardous waste," as that term is defined in Section 1004(5) of the Act 42 U.S.C. §6904(5) and in 40 CFR §261.3. By the submittal of a Part A application pursuant to the requirements of 40 CFR Part 122, you requested a permit to conduct such hazardous waste activities.

2. The above-referenced inspection revealed that your facility was being used for the treatment, storage, or disposal of hazardous waste.

3. 40 CFR Part 265 sets interim status standards for treatment, storage and disposal facilities for hazardous wastes. These interim status standards apply until final administrative disposition of permit applications submitted by the owners of 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 to the facility.

4. The above-referenced inspection revealed that your facility was in violation of certain provisions of the Part 265 interim status standards. The following checked paragraphs indicate the regulatory provisions that have been violated:

NJD076

Bendix

U. S. Environmental Protection Agency
September 7, 1982
3.

Pursuant to your discussions with Mr. K. A. Wallach on September 3, 1982, EPA has granted an additional 60 day extension in order to permit the environmental consultants adequate time to conduct their survey, review and prepare the formalized written waste analysis plan.

Bendix trusts the foregoing comments and action meet with your approval and thanks you for your cooperation in this matter.

Very truly yours,

W. A. Hooper

W. A. Hooper
Manager, Plant Engineering

cc: Tom Taccone, Permits Administration Branch
D. W. Gabrielsen
K. A. Wallach
A. P. Tumminello
J. R. Weber

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II
26 FEDERAL PLAZA
NEW YORK, NEW YORK 10278

JUN 2 0 1982

Mr. William Hooper
Dandix Corporation
Route 46
Teterboro, NJ 07608

Re: Dandix Corporation
EPA Identification number: NJD078714433
Facility located at : Teterboro, New Jersey

Inspection performed on : April 8, 1982

Dear Sir or Madam:

The Environmental Protection Agency ("EPA") is charged with responsibility for implementing 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 ("RCRA"), 90 Stat. 2795, P.L. 94-580 (1976).]

OH
Thomas
9/30/82

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2. The above-referenced inspection revealed that your facility was being use the treatment, storage, or disposal of hazardous waste.

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T. Taccone

SEP 10 2 06 PM '82
ENVIRONMENTAL PROTECTION AGENCY
NEW YORK, N.Y. 10007

Bendix

Guidance Systems Division

Teterboro, N J 07608
Tel (201) 288-2000
The Bendix Corporation

Final letter
Need US input

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

September 7, 1982

Attention: Mr. Andrew Praschak
Attorney, General Enforcement Branch

Re: The Bendix Corporation EPA ID #NJD078714433
RCRA-Site Inspection - April 8, 1982
EPA - Enforcement Branch Letter Dated
June 29, 1982, Copy Attached.

Dear Mr. Praschak:

Pursuant to the subject EPA letter of June 29, 1982, please be advised that the items noted under paragraphs 5, 6, 7, 9, 10, 11 and 13 have been corrected as follows:

6). 40 CFR 265.14 Security - Missing Sign.

Bendix notes that the missing sign, "Authorized Personnel Only", was replaced on April 9, 1982.

Bendix also notes that its former outside storage area was relocated to its new 3,000 sq. ft. secured, hazardous waste storage building, completed in August at a cost of $35,000.

7). 40 CFR 265.15 Scheduled Inspections.

Bendix notes that its daily scheduled inspections of the hazardous waste storage facility are being logged and documented.

9). 40 CFR 265 - Parts 51-52-53 Contingency Plan

At the time of the RCRA site inspection, Bendix was in the process of engaging the services of Management Resources International Inc., an environmental consulting firm, to review, update and formalize its existing contingency plan.

This effort was completed in August.

10). 40 CFR 265.73 Documentation - Waste Storage Accumulative Data.

Bendix records reflecting the daily day-to-day accumulative hazardous waste in storage have been brought up to date and are being maintained.

11). 40 CRF 265.112 Written Closure Plan

Bendix notes that it has reviewed its facility closure plan, updated same and all steps are complete.

13). 40 CFR 265.142 Closure Plan - Estimated Cost

The estimated cost to comply with the revised facility closure plan has been updated by current cost and liability coverage submitted.

5). 40 CFR 265.13(b) General Waste Analysis - Written Plan

Bendix notes that as part of its comprehensive Waste Management Operational Review, it is presently in the process of engaging an environmental consulting firm to study certain aspects of its operation. As part of this study they will prepare and formalize our general waste analysis procedures.

Bendix

Pursuant to your discussions with Mr. K. A. Wallach on September 3, 1982, EPA has granted an additional 60 day extension in order to permit the environmental consultants adequate time to conduct their survey, review and prepare the formalized written waste analysis plan.

Bendix trusts the foregoing comments and action meet with your approval and thanks you for your cooperation in this matter.

Very truly yours,

W. A. Hooper

W. A. Hooper
Manager, Plant Engineering

cc: Tom Taccone, Permits Administration Branch
D. W. Gabrielsen
K. A. Wallach
A. P. Tumminello
J. R. Weber

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II
26 FEDERAL PLAZA
NEW YORK NEW YORK 10278

JUN 25 1982

SEP 10 2 09 PM '82
ENVIRONMENTAL PROTECTION AGENCY
NEW YORK, N.Y. 10007

Mr. William Hooper
Bendix Corporation
Route 46
Teterboro, NJ 07608

Re: Bendix Corporation
EPA Identification number: NJD078714433
Facility located at : Teterboro, New Jersey

Inspection performed on : April 8, 1982

Dear Sir or Madam:

The Environmental Protection Agency ("EPA") is charged with responsibility for implementing 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 ("RCRA"), 90 Stat. 2795, P.L. 94-580 (1976).]

In accordance with this responsibility, an inspection was performed at the above-referenced facility ("the facility") by a duly authorized representative of the EPA pursuant to Section 3007 of the Act. On the basis of this inspection, the Director of the Enforcement Division of the EPA Region II office has determined that you have violated Section 3005 of the Act, 42 U.S.C. §6925 and the regulations promulgated thereunder, as specified by the checked boxes on the following pages.

1. By notification you informed EPA that you conduct activities at the facility involving "hazardous waste," as that term is defined in Section 1004(5) of the Act, 42 U.S.C. §6904(5) and in 40 CFR §261.3. By the submittal of a Part A application pursuant to the requirements of 40 CFR Part 122, you requested a permit to conduct such hazardous waste activities.

2. The above-referenced inspection revealed that your facility was being used for the treatment, storage, or disposal of hazardous waste.

3. 40 CFR Part 265 sets interim status standards for treatment, storage and disposal facilities for hazardous wastes. These interim status standards apply until final administrative disposition of permit applications submitted by the owners of 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 to the facility.

4. The above-referenced inspection revealed that your facility was in violation of certain provisions of the Part 265 interim status standards. The following checked paragraphs indicate the regulatory provisions that have been violated:

/X/ 5. 40 CFR §265.13(b) requires that the owner or operator of a hazardous waste treatment, storage or disposal facility must develop and follow a written waste analysis plan. At the time of the above-referenced inspection, information present at your facility was insufficient to meet the requirements of this sectio You were therefore in violation of 40 CFR §265.13(b).

/X/ 6. 40 CFR §265.14 requires that the owner or operator of a hazardous waste facility must prevent the unknowing entry, and minimize the possibility of unauthorized entry of persons or livestock onto the active portion of the facility. At the time of the above-referenced inspection, site security at the facility was insufficient to meet all the requirements of this section. You were therefore in violation of 40 CFR §265.14.

/X/ 7. 40 CFR §265.15 requires that the owner or operator of a hazardous waste facility must develop and follow a written schedule of inspections for certain specified portions of its facility. The owner or operator must also retain a record of these inspections in a log or summary. At the time of the above-refere inspection documents available at your facility were insufficient to meet the requirements of this section. You were therefore in violation of 40 CFR §265.15.

/ / 8. 40 CFR §265.16(d) requires that the owner or operator of a hazardous waste facility must maintain written documentation of personnel, jobs, and job-related training conducted at the facility. Documentation which existed at the facility at the time of the above-referenced inspection did not contain all of the required information. You were therefore in violation of 40 CFR §265.16(d).

/X/ 9. 40 CFR §265.51 requires that the owner or operator of a hazardous waste facility must have a written contingency plan for the facility designed to minimize hazards to human health or the environment from any unplanned release of hazardous waste constituents.

/X/ a. 40 CFR §265.52 describes the required contents of the plan. At the time of the above-referenced inspection, your plan did not contain all of the required elements. You were therefore in violation of 40 CFR §265.52.

/X/ b. 40 CFR §265.53 requires that copies of the plan be maintained at the facility and be submitted to local police and fire departments, hospitals and other official agencies who might be called upon in an emergency. At the time of the above-referenced inspection, copies of the plan had not been distributed in compliance with this section. You were therefore in violation of 40 CFR §265.53.

/ / c. 40 CFR §265.55 requires that a facility employee responsible for coordinating emergency measures be either at the facility or on call at all times. At the time of the above-referenced inspection, no emergency coordinator was at the facility or on call. You were therefore in violation of 40 CFR §265.55.

/X/ 10. 40 CFR §265.73 requires that the owner or operator of a hazardous waste facility must maintain an operating record at the facility containing certain required information, including a description of the type, quantity, and location of all wastes held at the facilcy. At the time of the above-referenced inspection

documents available at the facility were insufficient to meet the requirements of this section. You were therefore in violation of 40 CFR §265.73.

/ X/ 11. 40 CFR §265.112 requires that the owner or operator of a hazardous waste facility must develop and maintain at the facility a written closure plan which describes the steps necessary to close all or part of the facility. At the time of the above-referenced inspection, documents available at the facility were insufficient to meet the requirements of this section. You were therefore in violation of 40 CFR §265.112.

/ / 12. 40 CFR §265.118 requires that the owner or operator of a hazardous waste facility must develop and maintain at the facility a post-closure plan which describes the steps necessary to maintain the facility after closure. At the time of the above-referenced inspection, documents available at the facility were insufficient to meet the requirements of this section. You were therefore in violation of 40 CFR §265.118.

/ X/ 13. 40 CFR §265.142 requires that the owner or operator of a hazardous waste facility must, by May 19, 1981, have at the facility a written estimate of the costs of closing the facility. At the time of the above-referenced inspection, documents available at the facility were insufficient to meet the requirements of this section. You were therefore in violation of 40 CFR §265.142.

Section 3008 of the Act authorizes the assessment of a civil penalty of up to $25,000 per day for violations of statutory provisions or relevant regulations. The determination of whether a penalty is to be imposed is based upon the nature and seriousness of the violation and any good faith efforts to comply with the applicable requirements. It has been determined in this case that no penalty will be imposed for the violations cited above.

It is the company's responsibility to correct all violations cited herein as expeditiously as possible. Should the cited violations be discovered at the company's facility during future inspections, it is likely that an action for the assessment of a civil penalty will be initiated. Furthermore, please be advised that this letter in no way precludes future enforcement actions for any other violations discovered as a result of this or any other inspection.

Please confirm in writing within sixty (60) days of your receipt of this letter that the above-cited violations have been corrected. This confirmation should be addressed to Andrew Praschak, Attorney, General Enforcement Branch, Enforcement Division, 26 Federal Plaza, New York, New York 10278. Also, please send a copy of this confirmation to Tom Taccone, Permits Administration Branch, at the same address. You must include your EPA identification number in any correspondence. Should you have any questions about this Notice or should you wish to discuss this matter further, please contact Mr. Praschak at (212) 264-2645.

Dated: New York, New York
6/26, 1982

MICHAEL P. BONCHONSKY
Acting Director, Enforcement Divisio
U.S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, New York 10278

File NJD078714433

needs # not in position on NJ list

Bendix

Guidance Systems Division

Teterboro, N.J. 07608
Tel (201) 288-2000
The Bendix Corporation

Mr. Harry Ruisi
Environmental Protection Agency
Region II
26 Federal Plaza
New York, N.Y. 10278

Subject: Notification of Hazardous Waste Activity

Dear Mr. Ruisi:

On August 18, 1980, we submitted our Notification of Hazardous Waste Activity form. To date we have not received our Installation E.P.A. I.D. No.. As you are aware, this number is required to complete our form A to be filed in November.

Your cooperation in getting this information to us as soon as possible will be greatly appreciated.

Thanking you in advance, I remain.

Very truly yours,

William A. Hooper

William A. Hooper, Manager
Plant Engineering

WAH/cam
cc: D.W. Gabrielsen

PE... ...ANCH
Oct 30 1 57 PM '80
ENVIRONMENTAL PROTECTION AGENCY
NEW YORK, N.Y. 10007

An Equal Opportunity Employer M/F

PS Form 3811, Jan. 1979

RETURN RECEIPT REGISTERED, INSURED, CERTIFIED MAIL

SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)
- ☒ Show to whom and date delivered ..... ___ ¢
- ☐ Show to whom, date and address of delivery ..... ___ ¢
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered ..... ___ ¢
- ☐ RESTRICTED DELIVERY
  Show to whom, date, and address of delivery $ ___

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
E.P.A. Region II
Information Res. Center
26 Federal Plaza
N.Y.

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
788		

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

J. Harrison

4. DATE OF DELIVERY
8-19-80

POSTMARK
NY CHURCH ST. STA.
AUG 20 1980

5. ADDRESS (Complete only if required)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

GPO 1979-289-848

OCT 30 1 57 PM '80
ENVIRONMENTAL PROTECTION AGENCY
NEW YORK, N.Y. 10007

ERC/LANCY
Division Dart Environment and Services Company
525 WEST NEW CASTLE STREET
ZELIENOPLE, PENNSYLVANIA 16063
(412) 452-9360 TELEX 86-6259

June 18, 1981
Ref. 1091506

JUL 21 12 48 PM '81
ENVIRONMENTAL PROTECTION AGENCY
NEW YORK, N.Y. 10007

Mr. William A. Hooper
Bendix Corporation
Flight Systems Division
Teterboro, New Jersey 07608

Metal Hydroxide Sludge Dated 6/03/81 Received 6/10/81

Parameter	Sludge (mg/kg)	EP Leachate (mg/L)
pH (SU)	----	6.65
Arsenic	3.9	0.02
Barium	136.	4.8
Cadmium	134.	1.54
Chromium, hexavalent	----	<0.01
Chromium, total	407.	0.01
Lead	662.	<0.01
Mercury	0.0846	0.0034
Selenium	<2.	<0.01
Silver	<2.	0.02
Nickel	716.	12.1
Cyanide	12.	0.01
Solids (%)	29.7	----

The sludge sample was tested according to 40 CFR 261.24, Appendix II and analyses performed according to procedures found in "Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods," SW-846.

ERC/Lancy
Division of Dart Environment and Services Company

W. Fred Stevens

W. Fred Stevens
Vice President

cc: P.W. Deroo, Dynatrol, Inc.
I.E. Wittmann, ERC/Lancy
T. Whalen, ERC/Lancy
C. J. Ritzert, ERC/Lancy

NOV 25 2 50 PM '80
ENVIRONMENTAL PROTECTION AGENCY
NEW YORK, N.Y. 10007

File
NJD 078714433

Amend

OK

Bendix

Guidance Systems Division

Teterboro, N J 07608
Tel (201) 288 2000
The Bendix Corporation

Environmental Protection Agency, Region II
26 Federal Plaza
New York, N.Y. 10278
Attn: Mr. Thomas Taccone
Permits Administration Branch Rm. 432

November 19, 1980

Re: Hazardous Waste Permit Application
The Bendix Corporation, EPA I.D.# (N.J.D. 042 797 274)

Dear Mr. Taconne:

The Bendix Corporation of Teterboro, New Jersey, hereby submits its Hazardous Waste Permit Application - Part "A", Form 1 and 3 as required by the Resource Conservation Recovery Act of 1976.

Pursuant to your telephone conversation with our Mr. Ken Wallack and myself on November 18, 1980 relative to Bendix' obtaining its EPA I.D. No.; the following will serve to confirm that conversation and your verbal approval for Bendix's use of the above referenced identification number.

This I.D. No. had been assigned to The Bendix Corporation of Teterboro, but unfortunately under an obsolete address. The Bendix Corporation hereby formally request that your records be changed to indicate our proper mailing address of Route 46, Teterboro, N.J. 07608 instead of 43 William Ave. Hasbrouck Heights, N.J.

Further you also noted your office was unable to locate our initial Hazardous Waste Activity Notification form of August 18, 1980. Per your request we are enclosing a duplicate copy of this notification form and the registered receipt of same.

Thanking you again for your cooperation and assistance in this matter. We remain.

Very truly yours,

William A. Hooper

William A. Hooper, Manager
Plant Engineering

WAH/cam
Encl. (2) Hazardous Waste Permit Application Form 143 Original
Hazardous Waste Activity Notification Duplicate Copy

cc: Dr. Richard Baker-EPA
D.W. Gabrielsen
K. Wallack, Esq.
W. Graham
G. George

An Equal Opportunity Employer M/F

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

GSA No. 0245-EPA-OT

EPA — U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.	NJD 042797274
I. NAME OF INSTALLATION	THE BENDIX CORPORATION
II. INSTALLATION MAILING ADDRESS	ROUTE 46 TETERBORO, NEW JERSEY 07608
III. LOCATION OF INSTALLATION	ROUTE 46 TETERBORO, NEW JERSEY 07608

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	APPROVED	DATE RECEIVED (yr., mo., & day)
F NJD042797274 T/A C 1		

I. NAME OF INSTALLATION

THE BENDIX CORP. TETERBORO FACILITY

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3 ROUTE 46

CITY OR TOWN	ST.	ZIP CODE
4 TETERBORO NEW JERSEY		07608

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 5 ROUTE 46

CITY OR TOWN	ST.	ZIP CODE
6 TETERBORO NEW JERSEY		07608

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)	PHONE NO. (area code & no.)
2 HOOPER WILLIAM MGR PLANT ENGR	201-288-2000

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 THE BENDIX CORPORATION

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.

I.D. – FOR OFFICIAL USE ONLY

W

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 F001	2 F003	3 F005	4 F006	5 F007	6 F008
7 F009	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
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 P015	32 U151	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.)*

- [X] 1. IGNITABLE (D001)
- [X] 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
D. W. Gabrielsen	Douglas W. Gabrielsen, Director of Operations	8/15/80

EPA Form 8700-12 (6-80) REVERSE

ATTACH A

ATTACH A

NEW YORK, N.Y. 10007
ENVIRONMENTAL PROTECTION AGENCY
NOV 25 '80 08:48

INSPECTION SUMMARY REPORT

Project Number:	R02025
Project Name:	Waste Minimization Audit
Facility Name:	Allied Signal Aerospace
Facility ID #:	NJD078714433
Facility Address:	Route 46 Teterboro, NJ 07608 Bergen County
Facility Phone Number:	(201) 393-2452
Inspector(s):	Joseph J. Cerise
Date of Inspection:	February 28, 1995
Arrival/Departure:	9:30 AM/12:35 PM
Facility Representative(s):	Mark Schwind Principal Environmental Engineer
Exterior Observations:	
• **Weather:**	Rain, Freezing Rain, 29-31 degrees F, Overcast, Cloudy, Windy and Breezy
• **Land Use:**	The surrounding area is industrial and some businesses. The facility is adjacent to the Teterboro Airport.
• **Sensitive Areas/ Surface Waters:**	According to the facility, based on the New Jersey regulations the ditch traversing the site is considered a wetlands.

Operations and Process Description:

Allied Signal Aerospace assembles parts for the Department of Defense. Four activities take place at the Teterboro facility: Research and Development, Engineering, Accounting, and Government Offices. Machining and Maintenance support the R&D and Engineering functions.

Each Allied Signal facility is given an annual goal of waste generation separated between air and solid waste. The Teterboro facility has reportedly been meeting its goals.

Allied Signal participates in an informational exchange with AT&T, Martin Marietta, and Lockheed. Waste minimization options that are identified are reviewed to see if the end product would still meet the DOD standards. The economics of the proposal are then reviewed. The companies then see if anyone else has tried it. The companies may perform testing if no other information can be gathered.

Allied Signal has a Reward and Recognition Program for employees who come up with ways to reduce waste and improve the company.

Allied Signal is a participant in the EPA's 33/50 and Greenlights program.

Implementation of Waste Minimization Plan:

When asked if the Hazardous Waste Minimization Plan had been implemented, the facility representative said that because of the staff layoffs the Waste Minimization Plan had not been fully implemented. Employment at the facility has been reduced from 4,500 employees to 1,100.

The CEO has set the goal of being out of Chlorofluorocarbons (CFCs) by 1995. Allied Signal has eliminated all except for one process line which they have not found an alternative which works effectively.

Allied Signal switched from Trichloroethylene to 1,1,1-Trichloroethane to reduce the toxicity of the solvent used at the facility.

They have eliminated an electroplating process and have switched to an aqueous plating line eliminating the generation of F006 waste.

On one process line, the facility has replaced a solvent cleaning step with an aqueous alkaline rinse. They have not seen a decrease in quality of the end product. Prior to implementing the change, Allied Signal had to prove that Department of Defense Mill Standards could be met.

The machine shop has switched to biodegradable water based oils.

Photographs: None Taken.

ATTACHMENT I

Hazardous Waste Generated in 1994

Wastestreams by Waste Code	Description	Volume
D001, D006, D008, D018, D035	Petroleum Naptha from Parts Cleaning Operations	12,410 lbs.
D001, D002, D009, F002	Labpacks - R&D and Production	109,000 lbs.
D001	Paint Thinner	11,600 lbs.
F002	Spill Clean-up debris 1,1,1-Trichloroethane (1-10%)	4,000 lbs.
D002	Degreasing Operation	24,000 lbs.
D009	Mercury from dicarded thermometers	600 lbs.
P030	Discarded laboratory chemical	100 lbs.
F003	Flammable Liquids 5% Methyl Ethyl Ketone 5% Acetone	43,260 lbs.
F001	Degreaser 1,1,1-Trichloroethane	160,090 lbs.
D001	Compressed Hydrogen	400 lbs.
F001	1,1,1-Trichloroethane (1%) and Rags	4,000 lbs.
D002		4,000 lbs.
D002	Hydrochloric Acid (10%)	1,200 lbs.
D002, U134	Hydrofluoric Acid Soln.	400 lbs.
D001, P015		2,250 lbs.
F001	Trichlorotrifluoroethane from Vapor degreasing operations.	9,880 lbs.

D040, U228, U080	Trichloroethylene, Methylene Chloride	1,200 lbs.
D004	500 ppm Arsenic	7,000 lbs.
U228	Trichloroethylene	6,410 lbs.
F001	Trichloroethylene (90%) 1,1,1-Trichloroethane (10%)	6,353 lbs.
D009	Mercury	1,260 lbs.
F003	Isopropanol (5%), Acetone (5%), Xylene (5%), Methyl Ethyl Ketone (5%), Thinner (10%), Petroleum product (70%)	24,310 lbs.

United States Environmental Protection Agency
Air and Waste Management Division - Region 2

Waste Minimization Audit
Facility Information

Date 2-28-95 Time 9:45

Facility Name Allied Signal Aerospace

EPA ID# NJD078714433

Street Address Rte 46,
Teterboro, NJ 07608

Mailing Address Same

Point of Contact (Name/Title) Mark Schwind
Staff Environmental Eng.

Telephone (201) 393-2462

Fax # (201) 393-6553

Inspector (Name/Title) Joseph J Cerise
Consultant

Inspector's Telephone (212) 425-5470

Waste Minimization Audit

A. Facility Overview

1. Describe Facility Operation

See notes

2. SIC code(s) 3011

3. List Waste Generated (Waste Code, Amount/Month, Discharge)

Waste Code	Amount	Air Emission/Waste Water/Haz Waste
D001, D002, D009 F002	10,900 lbs	R&D lab; lab Packs
See Notes		

4. Describe how each waste stream is generated

See notes

5. Describe Disposal Management Practices
(Onsite/Offsite/TSDF/Treatment/Recycle)

	Safety Kleen
	Bethlehem Apparatus
	Mansol
	AETC

B. Waste Minimization Program

1. Waste Minimization Plan

Describe Overall Plan (✓ Written ____ Verbal)
(Obtain copy of written plan)

Could not obtain a copy of plan; see notes for summary

2. Waste Minimization Options Implemented for waste codes described (Project Outline/Waste Stream Reduction Goals/Date?Method of Implementation Resources/Accomplishments/Reduction Calculations)

See notes -

Labwastes

- Minimum Buy

Paints

- Have to meet Military Standards

Cutting Oils

Eliminated replaced w/ aqueous, biodegradable oils

Plating Eliminated

3. For each Waste Minimization Project Implemented Describe Benefits, (i.e., Financial, Facility Operations, Product, Waste Management)

Driving force behind Waste Minimization Efforts is Quality

4. Waste Minimization Options Explored for waste codes (Describe actual steps taken to implement options, provide documentation), (i.e., phone correspondence, journal reviews, etc.)

See notes

Joint Program - AT&T, Martin Marietta, Lockheed

No information given for facility waste minimization efforts

C. Company's Commitment

1. What role do the following individuals play in the waste minimization program, (i.e., Support, Suggestions, Incentives)

Upper Manager

Chairman - decided on solvent elimination; give direction many factors.

Departmental (Engineering, Quality Control, Accounting, Purchasing, Legal)

see notes on departments' roles -

Engineering - direct involvement; very supportive (Quality Control - same)

Accting - little role (NA) Purchasing - supportive - know what can be bought, etc. Legal - very little involvement

Operations Personnel (i.e., Equipment Operators, Line Workers, etc.)

aware of what is going on - i.e what standard they have to meet; TQM - people encouraged to suggest

D. Regulatory Requirements

1. Which of the following concerns the facility:
   - ✓ Ozone (Clean Air)
   - _ Thermal (Waste Minimization - Combustion Strategy)
   - _ Waste Minimization State/Federal Requirements

Ozone Depletion

2. Did the facility eliminate the use of ozone Depleting Chemicals?

YES ____ Date/Method

_____

NO ✓ Planned Date/Method

Goal to be out in 1995 - They know of one exception
no substitute

Thermal Unit

3. Does the facility treat waste using combustion management units? _____ YES _____ NO

Manifest

4. Does the facility sign and understand manifest certification requiring waste minimization efforts?

✓ YES _____ NO

E. Compliance Assistance

1. Does company want addition information or guidance an any of the following: Waste Minimization Program Development, Technical Assistance materials, Clean Air Act, Ozone Depleting Chemicals, Combustion Initiative, Recycling?

_____ NO ✓ YES (Specific Requests)

F. Multi-Media Checklist
(Complete Checklist Attached)

ID NO. NJD0787144433 DATE [illegible]

NAME OF FACILITY [illegible]

LOCATION OF [illegible]

7410)4vc

AETC
ADVANCED ENVIRONMENTAL
TECHNOLOGY CORPORATION

1 ROCKLAND, FLANDERS, NEW JERSEY 07836 (201-347-7111

December 7, 1989

Department of Environmental Protection
Division of Waste Management
Bureau of Manifest and Information Systems
CN028
Trenton, NJ 08625

Gentlemen:

This notice is being sent to your office to inform you of a manifest discrepancy that has been identified.

Attached is a discrepancy notification form. This form identifies the information that is incorrect and gives the correct information so that you may make the necessary changes in your records. Also attached is a copy of this manifest.

We regret any inconvenience this error may have caused. If you should have any questions or comments, please contact me at (201) 347-1909.

Very truly yours,

ADVANCED ENVIRONMENTAL
TECHNOLOGY CORPORATION

Gerald Schlomer
Manager, Facility

GS/lg
Encl.
pc:Allied Signal Aerospace
Teterboro, NJ

DISCREPANCY NOTIFICATION FORM

Manifest Number: NJA00+80657

Generator: Allied Signal Aerospace

Date Shipped: 3/02/89

The item(s) checked below have been determined to be incorrect on the above referenced manifest. The information that should appear on the manifest is shown next to the applicable section.

Section

___ GENERATOR'S ID _____

___ TRANSPORTER 1 ID # _____

___ DOT DESCRIPTION
Page ___ Section ___ _____

Line Number ___ _____

___ NUMBER OF CONTAINERS
Page ___ Section ___ _____

Line Number ___ _____

___ TYPE OF CONTAINER
Page ___ Section ___ _____

Line Number ___ _____

___ TOTAL QUANTITY
Page ___ Section ___ _____

Line Number ___ _____

___ UNITS
Page ___ Section ___ _____

Line Number ___ _____

___ WASTE NUMBER
Page ___ Section ___ _____

Line Number ___ _____

___ HANDLING CODES
Page ___ Section ___ _____

Line Number _____

OTHER Section 10. US EPA ID Number should read: NJD060631369

State of New Jersey
Department of Environmental Protection
Division of Hazardous Waste Management
Manifest Section
CN 028, Trenton, NJ 08625

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's Name and Mailing Address
ALTER SIGNAL RELEASE
ST [illegible] AVENUE
TEANECK, NJ 07666
4. Generator's Phone (201) 393-2452

5. Transporter 1 Company Name — 6. US EPA ID Number
ENVIRONMENTAL TRANSFER CORP. [illegible]

7. Transporter 2 Company Name — 8. US EPA ID Number

9. Designated Facility Name and Site Address — 10. US EPA ID Number
[illegible] ENVIRONMENTAL TECHNOLOGY CORP
[illegible] RD
FLANDERS, NJ. 07836

A. State Manifest Document Number: NJA 0480657
B. State Generator's ID: [illegible]
C. State Transporter's ID: [illegible]
D. Transporter's Phone: [illegible]
E. State Disposal Facility ID: [illegible]
F. Facility's Phone: [illegible]

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt./Vol.
a. X WASTE, SODIUM METHOXIDE, TOXICS, [illegible]	01	DM	010	P
b.				
c.				
d.				

J. Additional Descriptions for Materials Listed Above
PACKLAB CHEMICALS

K. Handling Codes for Wastes Listed Above
a. [illegible]
b. c. d.

15. Special Handling Instructions and Additional Information
TRANSPORTER [illegible]
PACKING SLIPS ATTACHED FOR CLASSIFICATION OF MATERIALS

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: [illegible] — Signature: [illegible] — Month Day Year: 03 [illegible]

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: [illegible] — Signature: [illegible] — Month Day Year: [illegible]

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name — Signature — Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: [illegible] — Signature: [illegible] — Month Day Year: 03 [illegible]

EPA Form 8700-22 (Rev. 3/88) Previous editions are obsolete.

SIGNATURE AND INFORMATION MUST BE LEGIBLE ON ALL COPIES

[illegible] 0480657

State of New Jersey
Department of Environmental Protection
Division of Hazardous Waste Management
Manifest Section
CN 028, Trenton, NJ 08625

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No: NJD078714433
Manifest Document No: N770499
2. Page 1 of 1
Information in the shaded areas is not required by Federal Law

3. Generator's Name and Mailing Address
ALLIED SIGNAL AEROSPACE
RT 46 MANSTON 1/2
TEETERCO NJ 07608
4. Generator's Phone (201) 393-2452

A. State Manifest Document Number: **NJA 0480657**
B. State Generator's ID: SAME
C. State Transporter's ID: NJDEPS6321-23607
D. Transporter's Phone: (201) 347-2215
E. Year Trans. ID:
F. Transporter's Phone:
G. State Facility's ID: N/A
H. Facility's Phone: (201) 317-1909

5. Transporter 1 Company Name: ENVIRONMENTAL TRANSFER CORP.
6. US EPA ID Number: NJD991291584
7. Transporter 2 Company Name:
8. US EPA ID Number:

9. Designated Facility Name and Site Address
ADVANCED ENVIRONMENTAL TECHNOLOGY CORP.
GOLDMINE RD.
FLANDERS, NJ 07836
10. US EPA ID Number

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM		12. Containers No	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. X WASTE, SODIUM AZIDE, POISON B, UN1687		01	DM	012	P	P105
b.						
c.						
d.						

NO EPA ID

J. Additional Descriptions for Materials
PACK LAB CHEMICALS

K. Handling Codes for Wastes Listed Above
a. S01
b.
c.
d.

15. Special Handling Instructions and Additional Information
(TRANSPORTATION ONLY)
PACKING SLIP ATTACHED FOR CLASSIFICATION OF MATERIALS

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: MATTHEW D. WATSON
Signature: M D Watson
Month Day Year: 03 02 89

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: CEDRIC ELLINESMITH
Signature: Cedric Ellinesmith
Month Day Year: 03 02 89

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Month Day Year:

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: [illegible]
Signature:
Month Day Year: 03 02 89

GENERATOR — TRANSPORTER — FACILITY

In case of an emergency or spill immediately call the state the emergency occurred in and the N.J. Dept. of Environmental Protection. (609) 292-6900 (Day) (800) 292-7172 (Night)

EPA Form 8700-22 (Rev. 3/88) Previous editions are obsolete

3 — TSD MAIL TO GENERATOR

SIGNATURE AND INFORMATION MUST BE LEGIBLE ON ALL COPIES

Generator ALLIED SIGNAL AEROSPACE Manifest Number [illegible]

II. The following restricted materials are on this manifest:

____ P001
____ P004
____ P005
____ P010
____ P011
____ P012
____ P015
____ P016
____ P018
____ P020
____ P030
____ P036
____ P037
____ P039
____ P041
____ P048
____ P050
____ P058
____ P059
____ P063

____ P068
____ P069
____ P070
____ P071
____ P081
____ P082
____ P084
____ P087
____ P089
____ P092
____ P094
____ P097
____ P102
X P105
____ P108
____ P110
____ P115
____ P120
____ P122 (when present at concentrations greater than 10%)
____ P123

____ U007
____ U009
____ U010
____ U012
____ U016
____ U018
____ U019
____ U022
____ U029
____ U031
____ U036
____ U037
____ U041
____ U043
____ U044
____ U046
____ U050
____ U051
____ U053
____ U061
____ U063
____ U064
____ U066
____ U067
____ U074
____ U077
____ U078
____ U086
____ U089
____ U103
____ U105
____ U108
____ U115

____ U122
____ U124
____ U129
____ U130
____ U133
____ U134
____ U137
____ U151
____ U154
____ U155
____ U157
____ U158
____ U159
____ U171
____ U177
____ U180
____ U185
____ U188
____ U192
____ U200
____ U209
____ U210
____ U211
____ U219
____ U220
____ U221
____ U223
____ U226
____ U227
____ U228
____ U237
____ U238
____ U248(when present at concentrations 0.3% or less)
____ U249(when present at concentrations 10% or less)

____ F006(Wastewater)
____ F007
____ F008
____ F009
____ F019
____ K004(Wastewater)
____ K008(Wastewater)
____ K011
____ K013
____ K014
____ K017
____ K021(Wastewater)
____ K022(Wastewater
____ K031
____ K035
____ K036(Wastewater)
____ K046(Explosive non-wastewaters)
____ K060(Wastewater)
____ K061(Wastewater)
____ K069(Calcium sulfate subcategory)
____ K069(Wastewater)

____ K073
____ K083(Except no ash subcategory)
____ K084
____ K085
____ K086(Solvent sludge, caustic water wash and sludge subcategory)
____ K101(High arsenic subcategory greater than 1%)
____ K102(High arsenic subcategory greater than 1%)
____ K106

III.

I certify under penalty of law that the requirements of 40 CFR 268.8(a)(1) have been met and that I have contract to treat my waste (or will otherwise provide treatment) by the practically available technology which yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted is tr accurate, and complete. I am aware that there are significant penalties for submitting false information, includ the possibility of fine and imprisonment.

IV. Waste analysis data is/is not attached. (circle one)

V. Signature [signature]

Printed Name MATT WATSON

Title ENV. ENGINEER Date 3/2/89

Allied-Signal Aerospace Company

Guidance Systems Division
Teterboro, New Jersey 07608
Telephone (201) 288-2000

Allied Signal

New Jersey Department of Environmental Protection
Division of Hazardous Waste Management
2 Babcock Place
West Orange, New Jersey 07052

JAN 19 1990

January 10, 1990

Attention: Ms. Jodie Stein

Subject: Notice of Violation of the Solid Waste Management Act

Dear Ms. Stein:

Allied Signal Aerospace Company, Teterboro facility is in receipt of and has reviewed the notice of violation dated December 15, 1989, concerning the violations of NJAC 7:26-7.4(a)4viii, NJAC 7:26-7.4(a)vi and NJAC 7:26-9.3(b).

The following corrective action noted below, to attain regulatory compliance, has been undertaken and/or provides the rationale why additional action is not warranted for the alledged violation:

1. NJAC 7:26-7.4(a)4viii - Use of Improper Waste Code on Manifest Number CT B 0075809 dated August 12, 1987.

   Allied Signal notes that the waste codes used for the subject manifest were proper and in compliance with the receiving state, Connecticut, manifesting regulatory code requirements. It is also in concert with the NJAC regulatory code 7:26-8.16, Hazardous Constituents, which covers N.J. requirements for a waste stream with hazardous constituents. i.e., The subject waste containing a hazardous constituent, formaldehyde, was classified as a hazardous waste by Allied Signal, the generator, pursuant to NJAC 7:26-8.6 and 8.7. However, the State of Connecticut in accordance with 40 CFR Part 261, its controlling document, does not recognize the subject material as a hazardous waste. Per Connecticut regulatory code, specialize waste streams/material under which this would be classified - control cognizance falls under "List of Non-Hazardous, Connecticut Regulatory Wastes", copy enclosed.

   Abiding by this regulation, the proper classification under Connecticut regulation and its codes is CR04. This also conforms to the manifesting requirements for NJ State manifest form under reference instruction (I).

2. NJAC 7:26-7.4(a)4vi - No TSD EPA ID Number for Manifest Number NJA 048657.

   Allied Signal Aerospace Company's lab pack contractor, Advanced Environmental Technology Corporation, forwarded a letter of manifest discrepancy to the Bureau of Manifest and Information Systems on December 7, 1989, correcting this discrepancy. Copy enclosed.

3. NJAC 7:26-9.3(b) - Failure to Obtain Written Approval from the Department to Store Hazardous Waste in an Above Ground Tank for 90 Days or Less.

   This was apparently overlooked at the time the facility status as a TSDF under its Part "A" was withdrawn and reclassified to that of a generator status only. This subsequent approval apparently led to the misconception that the subject tank, per se was included in the approval.

   Correcting this misconception, ASAC has filed with the Bureau of Hazardous Waste Engineering, the proper documentation requesting the Bureau's approval for the subject tank and secondary containment area. Copy enclosed.

Allied Signal Aerospace Company trusts that this meets with the Department's approval, and if there are any questions, please do not hesitate to contact the undersigned at 201-393-2452.

Sincerely,

Mark S. Schwind
Environmental Engineer
MSS/sk
Enclosures (3)

cc: W. Hooper
D. Leak

Rev./9/23/86

LIST OF NON-HAZARDOUS, CONNECTICUT REGULATED WASTES

(NOTE:) These are wastes which are neither characteristically nor listed Hazardous Wastes as per 40 CFR 261, but a facility permit is required by Section 22a-454 of the Connecticut General Statutes for a person engaged in the business of storage, treating, disposing or transporting* them.

Waste #	Waste Name	Description
CR01	Waste PCBs	are any waste material containing or contaminated by PCBs (Polychlorinated Biphenyls) in concentrations at or above 50 ppm (parts per million). These include, but are not limited to, PCB oils, items and equipment.
CR02	Waste Oil	is oil or petroleum that is no longer suitable for the services for which it was manufactured due to the presence of impurities or a loss of original properties, and is not miscible in water. These include, but are not limited to, crude oil, fuel oil, lubricating oil, kerosene, diesel fuel, motor oil, non-halogenated oil, and oils that are recovered from oil separators, oil spills, or tank bottoms.
CR03	Waste Water Soluble Oil	is oil or petroleum that is no longer suitable for the services for which it was manufactured due to the presence of impurities or a loss of original properties, and is miscible in water. These include, but are not limited to, cutting oil emulsions or coolants.
CR04	Waste Chemical Liquids	are any wastes that are liquid, free flowing and/or contains free draining liquids and are toxic, hazardous to handle and/or may cause contamination of ground and/or surface water if improperly managed. These wastes may include, but are not limited to paint wastes, grinding wastes, and waste sludges.
CR05*	Waste Chemical Solid	means any chemical solid or semi-solid from a commercial, industrial, agricultural, or community activity.

* The Connecticut General Statutes do not require the transporter to be licensed to transport CR05 (Waste Chemical Solid)

Check T.A. -
D.B. has 15,000 Gals
SOI
- If the three (3) tanks are the only TSD activity then change the notifiers list accordingly

Bendix Corp.

State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF WASTE MANAGEMENT
32 E. Hanover St., CN 028, Trenton, N.J. 08625

DR. MARWAN M. SADAT, P.F.
DIRECTOR

RICHARD C. SALKIE, P.E.
ASSOCIATE DIRECTOR

APR 2 1986

(Matin PDS) - 12/22/86

Mr. William Hooper, Manager
Plant Engineering
Allied Bendix Corporation
Teterboro, New Jersey 07860

RE: Approval of Hazardous Waste Storage Tanks Closure Plans for Allied Bendix Corporation, Teterboro, EPA ID No. NJD 078 714 433, NJ Facility No. CP-84-21

Dear Mr. Hooper:

The Bureau of Hazardous Waste Engineering (the Bureau) has completed a review of the closure plans for hazardous waste tank storage for the above referenced facility dated July 24, 1985. The New Jersey Department of Environmental Protection (NJDEP) finds the plans in compliance with the criteria set forth in Subchapter 9 of N.J.A.C. 7:26.

Allied Bendix Corporation is hereby authorized to close the subject three (3) hazardous waste storage tanks according to the approved closure plans and as follows:

1. Remove all hazardous waste from the storage tanks and manifest off-site to an authorized hazardous waste facility.

2. The tanks and any associated equipment shall be thoroughly washed with clean solvent.

3. The tank surface and any surrounding surface which may have come in contact with hazardous waste shall be cleaned, by sandblasting or equivalent means to remove all residues of hazardous waste.

4. All sandblasting residues as well as any waste wash solvents from the above operations shall be collected and manifested off-site to an authorized hazardous waste facility.

5. Allied Bendix Corporation shall sample and analyze the soil in accordance with the approved soil sampling and analysis plan. The company shall notify the Bureau at least two (2) weeks prior to sampling to arrange to have an auditor present during field sampling.

9-3(b)

Allied-Signal Aerospace Company
Guidance Systems Division
Teterboro, New Jersey 07608
Telephone (201) 288-2000

Allied Signal

New Jersey Department of Environmental Protection
Bureau of Hazardous Waste Engineering
Division of Hazardous Waste Management
33 Arctic Parkway
Trenton, New Jersey 08625

January 15, 1990

Attention: Mr. Tom Sherman

Reference: NJAC 7.26-9.3(b) Department's Approval of Hazardous Waste On-Site Accumulation in Above-Ground Tank for 90 Days or Less

Dear Mr. Sherman:

In accordance with the above reference, Allied Signal Aerospace Company, Teterboro facility hereby requests the Department's approval for the use of a 5,000 gallon above-ground storage tank for the accumulation of spent cupric chloride etchant.

Pursuant to this, the following information is being supplied to the Department to facilitate in the approval process:

1. The shell thickness of the tank walls is .3125 inches with the dishes being .250 inches, with the structural layers being fabricated from Iaophthalic. In addition to this, an inner surface liner and 100 mil back-up layer fabricated wth Atlac 382 being reinforced with one-ply of 10mil "C" glass surface veil, is provided.

2. The controls to prevent overfilling of the tank, in accordance with NJAC 7:26-10.5(c), is a high liquid level alarm system, comprised of visual and audible alarms which is activated upon the tank reaching three quarters capacity, at which time, the system generating the material would be turned off by the operator until such time the material can be shipped offsite.

   In addition, Allied Signal Aerospace Company notes that the operational characteristics of this specific manufacturing operation is such that in complying with NJAC 7:26-9.3, "Accumulation of Hazardous Waste for 90 Days or Less", approximately 2,500 gallons of waste is generated within the allotted timeframe.

3. Secondary containment is provided in accordance with NJAC 7:26-10.5(d) as verified by the enclosed blueprints. Although the containment area is designed to provide capacity in excess of the tank volume, (128%), a tank rain skirt is also provided to eliminate the accumulation of precipitation within the containment area.

4. The tank is designed in such a manner which permits over 99% of the tank volume to be removed upon disposal of the spent etchant.

5. The tank is rendered empty as defined in NJAC 7:26-1.4, upon disposal of spent etchant.

6. All waste removed from the tank is shipped as a hazardous waste to an EPA approved facility, as defined in NJAC 7:26-1.4.

7. Allied Signal Aerospace Company is in compliance with the personnel training and preparedness and prevention, contingency plans and emergency procedures which is demonstrated by Allied's Spill Prevention, Control and Countermeasure Plan (copy enclosed).

8. The tank is not below grade.

9. The tank is appropriately labeled as hazardous waste.

Allied Signal Aerospace Company trusts this meets with the Department's approval, and if there are any questions, and/or additional information is required, please do not hesitate to contact the undersigned at 201-393-2452.

Sincerely,

Mark S. Schwind
Environmental Engineer
MSS/sk
Enclosures

cc: D. Leak
W. Hooper

State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
John J. Trela, Ph.D., Acting Director
401 East State St.
CN 028
Trenton, N.J. 08625
609 - 633 - 1408

JUN 24 1987

Mr. William Hooper, Manager
Plant Engineering
Allied Bendix Aerospace
Teterboro, NJ 07860

Dear Mr. Hooper:

RE: Reclassification of Allied Bendix Aerospace, Teterboro, EPA ID No. NJD 078 714 433

The Bureau of Hazardous Waste Engineering (the Bureau) has reviewed the closure certification for the hazardous waste storage tanks submitted by Allied Bendix Aerospace dated July 18, 1986. The Division of Hazardous Waste Management inspected the subject facility on October 21, 1986. The Department has determined that the subject three hazardous waste storage tanks have been closed in accordance with the approved closure plan dated April 2, 1986 and N.J.A.C. 7:26-9.8.

The Bureau has reviewed the Part A application submitted by Allied Bendix Aerospace, Teterboro plant, to the USEPA and finds that the following activities are included in the subject facility's Part A application.

1. Hazardous Waste Storage in Containers (S01)-3,300 gallons.

2. Hazardous Waste Treatment in Tanks (T01)-220,000 gallons per day.

3. Hazardous Waste Storage in Tanks (S02)-26,300 gallons.

The S01 activities at this location were classified solely as generator of hazardous waste and T01 activities were classified as Industrial Waste Management Facility (IWMF) by the Department on November 18, 1983. As indicated above the S02 activity at the subject facility has been closed and certified by Allied Bendix Aerospace.

However, please be advised that submission of a ground water monitoring plan in accordance with N.J.A.C. 7:14A-6 for the underground hazardous waste storage tanks may be required. The Bureau is sending this information to:

Robert Berg, Chief
Bureau of Ground Water Quality Management
Division of Water Resources

JUN 24 1987

New Jersey Department of Environmental Protection
401 East State Street
Trenton, New Jersey 08625
Telephone: (609) 292-0424

Please contact the above Bureau to ensure compliance with the Division of Water Resources's regulations for the underground tanks used to store hazardous waste in the past.

Your company's hazardous waste facility above is no longer included in DEP's list of "existing facilities" (see N.J.A.C. 7:26-1.4 and 12.3) and therefore does not need to conform with the interim operating requirements of N.J.A.C. 7:26-1 et seq. for "existing facilities". To operate a hazardous waste facility without prior approval from the DEP is a violation of the Solid Waste Management Act. N.J.S.A. 13:1E-1 et seq.

This written acknowledgement of the exclusion of the subject company from TSD facility requirements under N.J.A.C. 7:26-1 et seq. is based expressly on the review of the aforementioned correspondence. This letter makes no claim as to the extent and physical condition of the actual hazardous waste activities not occurring at the site mentioned above.

The issuance of this delisting letter by the Department does not indicate, or imply, and should not be construed as a waiver of any requirements pursuant to the New Jersey Water Pollution Control Act, N.J.S.A. 58:10A-1 et seq. and regulations promulgated thereunder concerning the New Jersey Pollutant Discharge Elimination System, N.J.A.C. 7:14-1 et seq. If your facility is in any of the regulated categories identified in the above cited regulations, you are hereby directed to apply for any and all permits necessary within ninety (or 180 days - at the option of DWR) to the Bureau of Ground Water Discharge Permits, CN 029, Trenton, NJ 08625. Applications may be obtained by calling (609) 292-0424.

If you have any questions on this matter, please feel free to contact Ali Chaudbry at (609) 292-9880.

Very truly yours,

Ernest J. Kuhlwein Jr.

Ernest J. Kuhlwein, Jr., Acting Chief
Bureau of Hazardous Waste Engineering

EP11/vb
cc: [redacted]
Robert Berg, DWR
Karl Delaney, BCTS
Tom Sherman, BHWE

let's protect our earth

log

ENVIRONMENTAL PROTECTION AGENCY REGION II

90 FEB -9 PM 1:36

HAZARDOUS WASTE FACILITIES BRANCH

NJD078714433

State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF HAZARDOUS WASTE MANAGEMENT

Lance R. Miller, Acting Director

CN 028

Trenton, N.J. 08625-0028

(609) 633-1408

Fax # (609) 633-1454

FEB 02 1990

2/28/90

CMT 10: 502 LN 90 days approved

Mark S. Schwind
Environmental Engineer
Allied-Signal Aerospace Company
Guidance Systems Division
Teterboro, New Jersey 07608

RE: Less Than Ninety (90) Day Accumulation of Hazardous Waste in an Above-Ground Tank, Allied-Signal Aerospace Company, Guidance Systems Division, Teterboro EPA ID No. 078 714 433, TS-90-2

Dear Mr. Schwind:

The Bureau of Hazardous Waste Engineering (Bureau) has reviewed your January 15, 1990, submittal concerning less than ninety (90) day accumulation of hazardous waste in an above-ground horizontal five thousand (5000) gallon iaophthalic tank (Tank). The Bureau has found the submittal to be in compliance with N.J.A.C. 7:26-9.3(b). Therefore, the Bureau hereby approves accumulation of hazardous waste spent cupric chloride etchant in the Tank for less than ninety (90) days provided the following conditions are maintained:

1. The Tank shall have sufficient shell thickness to prevent rupture or collapse. Visual inspection of iaophthalic plastic tank shall be conducted to determine if any significant deterioration evidenced by obvious wall thinning, discoloration, disintegration, crazing, softening, swelling, indentations or delamination has occurred. In case of any significant deterioration observed during the visual inspection, the facility shall immediately notify the Bureau and discontinue use.

2. The controls to prevent overfilling shall be maintained in accordance with N.J.A.C. 7:26-10.5(c);

3. The Tank secondary containment area shall be maintained as specified in the aforementioned submittal and shall meet all the requirements specified under N.J.A.C. 7:26-10.5(d);

4. The tank shall be maintained so that at least ninety nine (99) percent of the volume of the tank can be emptied by direct pumping or drainage;

5. The Tank is rendered empty every ninety (90) days or less as defined by N.J.A.C. 7:26-1.4;

FEB 02 1990

6. All waste removed from the Tank shall be shipped off-site to an authorized facility as defined in N.J.A.C. 7:26-1.4;

7. Allied-Signal Aerospace Company shall comply with the requirements for owners or operators of hazardous waste facilities under N.J.A.C. 7:26-9.4(g), 9.6 and 9.7 concerning personnel training, preparedness and prevention, contingency plans and emergency procedures.

8. The Tank shall be clearly labeled or marked with the words "Hazardous Waste".

The facility must submit to the Bureau an engineering drawing of the Tank and the secondary containment system, signed and sealed by a New Jersey Licensed Professional Engineer within thirty (30) days from the date of this letter.

If you have any further questions, please call Mr. Yefim Kantor of my staff at (609) 292-9880.

Very truly yours,

Thomas Sherman

Thomas Sherman, Chief
Bureau of Hazardous Waste Engineering

EP11/cfd

c: Barry Tornick, USEPA, Region II
Yacoub Yacoub, BME

DOCUMENT: ALLIED2
FOLDER: CFDMOB

AlliedSignal
AEROSPACE

AlliedSignal Inc.
Guidance & Control Systems
Teterboro, NJ 07608-1173

201 288 2000

U.S. EPA, Region II
290 Broadway
New York, NY 10007-1866

8 March 1995

Dear Sirs:

AlliedSignal Aerospace, EPA ID # NJD078714433, regrets that it neglected to include copies of four land disposal restrictions in its Hazardous Waste Manifest files for 1992, as noted in an EPA letter dated 21 February 1995.

In order to correct this error, we have procurred these LDR's and incorporated them into our files. Attached are copies of manifests NJA 0996947, NJA 0996961, NJA 0996964, and ILO 3412239, and the LDR for each.

We hope that this action satisfies the Agency in regard to the noted violation of 40 C.F.R. Part 268. If you have any further questions or comments, please contact the undersigned. Thank you.

Sincerely,

Daniel P. White

Daniel P. White
Environmental Scientist

VHN-001 (REV. 9/88)

8

Please type or print in block letters. (Form designed for use ...)

Approved OMB No. 2050-0039, Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

2. Generator's US EPA ID No. N J D 0 7 8 9 1 4 4 3 3 1 Document No. Page 1 of 1 — Information in the shaded areas is not required by Federal law

3. Generator's Name and Mailing Address
Allied Signal Aerospace Company- Teterboro Facility
Route 46, Teterboro, N.J. 07608

4. Generator's Phone (201) 393-2714

A. State Manifest Document Number NJA 0996947

B. State Generator's ID Same

5. Transporter 1 Company Name: Chemical Waste Management, Inc.
6. US EPA ID Number: I L D 0 9 9 2 0 1 6 9 1
C. State Trans. ID NJHP 51 03 31
D. Transporter's Phone (201) 465-2121

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Trans. ID

9. Designated Facility Name and Site Address
Chemical Waste Management of New Jersey, Inc.
100 Lister Avenue
Newark, N.J. 07105
10. US EPA ID Number: N J D 0 8 9 2 1 6 7 9 0
F. Transporter's Phone ( )
G. State Facility's ID
H. Facility's Phone (201) 465-9100

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ Hazardous Waste Liquid, N06 Metal Hydroxide Salts, ORM-E F006, NA 9189	X	0 0 1	T T	X 4 5 0 0	G	F 0 0 6
b.						
c.						
d.						

J. Additional Descriptions for Materials Listed Above
L/T: Metal Hydroxide Salts 15%
Trace Heavy Metals, Water 85%
a. b. c. d.

K. Handling Codes for Wastes Listed Above
a. b. c. d.

15. Special Handling Instructions and Additional Information
In case of spill or accident, contact CWM 24-Hour emergency response telephone number (205) 652-9721, and refer to attached DOT Guide number 31.
CWM WO #A 33558 Decal 8/08 58 Profile # K33625

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Gary Bedrosian — Signature: Gary Bedrosian — Month Day Year: 0 3 1 9 2

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: [illegible] — Signature — Month Day Year: 3 5 1 9 2

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name — Signature — Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name — Signature — Month Day Year

GENERATOR — TRANSPORTER — FACILITY

In case of an emergency or spill immediately call the state the emergency occurred in and the N.J. Dept. of Environmental Protection. (609) 292-5365 (Day) (609) 292-7172 (Night)

NJA 0996947

EPA Form 8700-22 (Rev. 9/88) Previous editions are obsolete.

Manifest Section
CN 028, Trenton, NJ 08625

Type or print in block letters. (Form designed for use on elite (12 pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30

UNIFORM HAZARDOUS WASTE MANIFEST

N J D 0 7 8 7 1 4 4 3 3 1 000108

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

Generator's Name and Mailing Address
Allied Signal Aerospace Company- Teterboro Facility
Route 46, Teterboro, N.J. 07608
Generator's Phone 201 393-2724

A. State Manifest Document Number
NJA 0996947

B. State Generator's ID
Same

Transporter 1 Company Name
Chemical Waste Management, Inc. I L D 0 9 9 2 0 2 6 8 1

C. State Transporter's ID
NJDEP 57033

Transporter's Phone 201 465-2121

Chemical Waste Manggement of New Jersey, Inc.
100 Lister Avenue
Newark, N.J. 07105 N J D 0 8 9 2 1 6 7 9 0 201 465-9100

X RQ Hazardous Waste Liquid, NOS
Metal Hydroxide Salts, ORM-E F006, NA 9189 0 0 1 T T X 4800 G F 0 0 6

L/T: Metal Hydroxide Salts 15%
Trace Heavy Metals, Water 85%

S09 H01

15. Special Handling Instructions and Additional Information

In case of spill or accident, contact CWM 24-Hour emergency response telephone number (205) 652-9721, and refer to attached DOT Guide number 31.
CWM WO #43358 Decal #20258 Profile # K33625

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled/placarded, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Gary Bedrosian
Signature: Gary Bedrosian
Month Day Year: 03 19 92

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: LUKE PATTERSON
Signature: Luke Patterson
Month Day Year: 03 19 92

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Timothy J McElroy
Signature: Timothy J McElroy
Month Day Year: 03 19 92

EPA Form 8700-22 (Rev. 9/88) Previous editions are obsolete.

SIGNATURE AND INFORMATION MUST BE LEGIBLE ON ALL COPIES

1 — TSD MAIL TO - TSD'S STATE

...lied Signal Aerospace Company

Manifest Doc. No.: 1 0 0 0 -

...ite Number: 3 3 6 2 5

State Manifest No.: NJA 0996947

...s this waste a non-wastewater or a wastewater? (See 40 CFR 268.2) Check ONE: ☒ Non-Wastewater ☐ Wastewater

2. If this waste is subject to any California List restrictions enter the letter from below (either A, B1, or B2) next to each restriction that is applicable: _____HOCs, _____PCBs, _____Acid, _____Metals, _____Cyanides.

3. Identify ALL USEPA hazardous waste codes that apply to this waste shipment, as defined by 40 CFR 261. For each waste code, identify the corresponding subcategory, or check NONE if the waste code has no subcategory. Also check which treatment standards apply. Spent solvent and California List treatment standards are listed on the back of this form. If F039, multi-source leachate applies, those standards must be attached by the generator.

REF #	4. US EPA HAZARDOUS WASTE CODE(S)	5. SUBCATEGORY ENTER THE SUBCATEGORY DESCRIPTION IF NOT APPLICABLE SIMPLY CHECK NONE		6. APPLICABLE TREATMENT STANDARDS		7. HOW MUST THE WASTE BE MANAGED ENTER THE LETTER FROM BELOW
				6.a - PERFORMANCE-BASED: CHECK AS APPLICABLE	6.b - SPECIFIED TECHNOLOGY: IF APPLICABLE ENTER THE 40 CFR 268.42-TABLE 1 TREATMENT CODE(S)	
		DESCRIPTION	NONE	268.41(a) 268.43(a)	268.42(a)	
1	F 006		X	X X		A
2						
3						
4						
5						
6						
7						
8						
9						
10						

To list additional USEPA waste code(s) and subcategory(s), use the supplemental sheet provided (CWM-2001-B) and check here: ☐

HOW MUST THE WASTE BE MANAGED? In column 7 above, enter the letter (A, B1, B2, B3, C, or D) below that describes how the waste must be managed to comply with the land disposal regulations (40 CFR 268.7). Please understand that if you enter the letter B1, B2, B3, or D, you are making the appropriate certification as provided below.

A. RESTRICTED WASTE REQUIRES TREATMENT

This waste must be treated to the applicable treatment standards set forth in 40 CFR Part 268 Subpart D, 268.32, or RCRA Section 3004(d).

B.1 RESTRICTED WASTE TREATED TO PERFORMANCE STANDARDS

"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based upon my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the performance levels specified in 40 CFR part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d) without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."

B.2 RESTRICTED WASTES FOR WHICH THE TREATMENT STANDARD IS EXPRESSED AS A SPECIFIED TECHNOLOGY (AND THE WASTE HAS BEEN TREATED BY THAT TECHNOLOGY)

"I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.42. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

B.3 GOOD FAITH ANALYTICAL CERTIFICATION - FOR INCINERATED ORGANICS

"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the nonwastewater organic constituents have been treated by incineration in units operated in accordance with 40 CFR Part 264 Subpart O or Part 265 Subpart O, or by combustion in fuel substitution units operating in accordance with applicable technical requirements, and I have been unable to detect the nonwastewater organic constituents despite having used best good faith efforts to analyze for such constituents. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

C. RESTRICTED WASTE SUBJECT TO A VARIANCE

This waste is subject to a national capacity variance, a treatability variance, or a case-by-case extension. Enter the effective date of prohibition in column 7 above.

D. RESTRICTED WASTE CAN BE LAND DISPOSED WITHOUT FURTHER TREATMENT

"I have determined that this waste meets all applicable treatment standards set forth in 40 CFR Part 268 Subpart D and all applicable prohibition levels set forth in Section 268.32 or RCRA Section 3004(d), and therefore, can be land disposed without further treatment. A copy of all applicable treatment standards and specified treatment methods is maintained at the treatment, storage and disposal facility named above. "I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d). I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting false certification, including the possibility of a fine and imprisonment."

I hereby certify that all information submitted in this and all associated documents is complete and accurate, to the best of my knowledge and information.

Sign: [illegible] Print: [illegible] Date: 3-8-95

State of Nc Jersey
Department of Enviro nental Protection
Division of Hazardous aste Management
Manifest Section
CN 028, Trento NJ 08625

Use type or print in block letters. (Form design for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. N J D 0 7 8 7 1 4 3 3 1 0 0 0
Manifest Document No.
Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
ALLIED SIGNAL AEROSPACE COMPANY
ROUTE 46 TETERBOR NJ 07608

4. Generator's Phone (201) 39 272

A. State Manifest Document Number
NJA 0996961

B. State Generator's ID
SAME

5. Transporter 1 Company Name
MARISOL INCORPORATED

6. US EPA ID Number
N J D 0 2 4 5 4 5 4 4

C. State Trans. ID NJDEPS-

7. Transporter 2 Company Name

8. US EPA ID Number

D. Transporter's Phone (908) 469-5100

E. State Trans. ID

9. Designated Facility Name and Site Address
MARISOL INCORPORATED
125 PAGE FACTORY LANE
MIDDLESEX, NJ 08846

10. US EPA ID Number
N J D 0 2 4 5 4 5 4 4

F. Transporter's Phone ( )

G. State Facility's ID

H. Facility's Phone (908) 469-3100

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

	HM		12. Containers No	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	X	RQ WASTE 1-1-1 TRICHLOROETHANE, ORM-A, F-001, UN 2631	012	M	00630	L	F001
b.	X	RQ WASTE METHYLENE CHLORIDE, ORM-A, F-001, UN 1593	001	M	00053	L	F001
c.	X	HAZARDOUS WASTE LIQUID, N.O.S., (TRIFLUORO-TRICHLOROETHANE), ORM-E, NA 9189	002	M	00105	L	F001
d.	X	RQ TRICHLOROETHYLENE ORM-A, F-001, UN 1710	002	M	00105	L	F001

J. Additional Descriptions for Materials Listed Above
a. L/T: TRICHLOROETHANE 100%
b. L/T: METHYLENE CHLORIDE 100%
c. L/T: TRIFLUOROTRICHLOROETHANE 100%
d. L/T: TRICHLOROETHYLENE 100%

K. Handling Codes for Wastes Listed Above
a. T04
b. T04
c. T04
d. T04

15. Special Handling Instructions and Additional Information
MATERIAL TO BE BENEFICIALLY RECLAIMED ACCORDING TO ABAC WASTE MINIMIZATION PLAN. IN CASE OF EMERGENCY, THE 24 HOUR RESPONSE RESPONSE INFORMATION TELEPHONE IS CHEMTREC 1-800-424-9300, AND REFER TO ATTACHED DOT RESPONSE GUIDE

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

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Printed/Typed Name: MARK SCHWING
Signature
Month Day Year: 06 10 92

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: M. Lavantin
Signature
Month Day Year: 06 10 92

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name
Signature
Month Day Year

GENERATOR
TRANSPORTER
FACILITY

In case of an emergency or spill immediately call the state the emergency occurred in and the N.J. Dept. of Environmental Protection. (609) 292-5960 (Day) (609) 292-7172 (Night)

EPA Form 8700-22 (Rev. 9/88) Previous editions are obsolete.

SIGNATURE AND INFORMATION MUST BE LEGIBLE ON ALL COPIES

State of New Jersey
Department of Environmental Protection
Division of Hazardous Waste Management
Manifest Section
CN 028, Trenton, NJ 08625

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. NJD078714433 | Manifest Document No. 10009 | 2. Page 1 of 1 | Information in the shaded areas is not required by federal law.

3. Generator's Name and Mailing Address
ALLIED-SIGNAL AEROSPACE COMPANY
ROUTE 46 TETERBORO, NJ 07608

4. Generator's Phone (201) 393-2724

A. State Manifest Document Number NJA 0996961

B. State Generator's ID SAME

5. Transporter 1 Company Name: MARISOL INCORPORATED | 6. US EPA ID Number: NJD002454544

C. State Trans. ID NJDEPS-B-15-8

7. Transporter 2 Company Name | 8. US EPA ID Number

D. Transporter's Phone (908) 469-5100

E. State Trans. ID

9. Designated Facility Name and Site Address
MARISOL INCORPORATED
125 PAGE FACTORY LANE
MIDDLESEX, NJ 08846 | 10. US EPA ID Number: NJD003454544

F. Transporter's Phone ( )

G. State Facility's ID

H. Facility's Phone (908) 469-5100

GENERATOR

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM		12. Container No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. X	RQ WASTE 1-1-1 TRICHLOROETHANE, ORM-A, F 001, UN 2831	012	DM		G	F001
b. X	RQ WASTE METHYLENE CHLORIDE, ORM-A, F-00 , UN 1593	001	DM		G	F001
c. X	HAZARDOUS WASTE LIQUID, N.O.S., (TRIFLUORO-TRICHLOROETHANE), ORM-E, NA 9189	002	DM		G	F001
d. X	RQ TRICHLOROETHYLENE, ORM-A, F-001, UN 17 0	002	DM		G	F001

J. Additional Descriptions for Materials Listed Above
a. L/T: 1,1,1 TRICHLOROETHANE 100%
b. L/T: METHYLENE CHLORIDE 100%
c. L/T: TRIFLUOROTRICHLOROETHANE 100%
d. L/T: TRICHLOROETHYLENE 100%

K. Handling Codes for Wastes Listed Above
a. T04 c. T04
b. T04 d. T04

15. Special Handling Instructions and Additional Information
MATERIAL TO BE BENEFICIALLY RECLAIMED ACCORDING TO ASAC WASTE MINIMIZATION PLAN. IN CASE OF EMERGENCY, THE 24 HOUR RESPONSE INFORMATION TELEPHONE IS CHEMTREC 1-800-424-9300, AND REFER TO ATTACHED DOT RESPONSE GUIDE.

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Printed/Typed Name: MARK SCHNITZ | Signature | Month Day Year 04 14 91

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name | Signature | Month Day Year

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name | Signature | Month Day Year

19. Discrepancy Indication Space

FACILITY

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name | Signature | Month Day Year

In case of an emergency or spill immediately call the state the emergency occurred in and the N.J. Dept. of Environmental Protection, (609) 292-5550 (Day); (609) 292-7172 (Night)

NJA 0996961

EPA Form 8700-22 (Rev. 9/88) Previous editions are obsolete.

SIGNATURE AND INFORMATION MUST BE LEGIBLE ON ALL COPIES

Marisol Incorporate
125 Factory Lane
Middlesex, N.J. 08846

This notice is being sent to you in accordance with 40 CFR 268.7 to inform you that this shipment contains the solvents identified below which are restricted from landfill. You should be aware that the residues from the treatment of these materials may not be landfilled unless the concentration is below the applicable non-wastewater treatment standard(s).

Manifest contains the following EPA Hazardous Waste Numbers: (check box[es])

F001-> [X] F002-> [ ] F003-> [ ] F004-> [ ] F005-> [ ]

The following materials are contained in the waste stream ...

	MATERIAL	NON-WASTEWATER TREATMENT STANDARD (mg/l)
	Acetone	0.590
	Benzene	3.700 (total)
	n-Butyl Alcohol	5.000
	Carbon Disulfide	4.810
	Carbon Tetrachloride	0.960
	Chlorobenzene	0.050
	Cresols (and Cresylic Acid)	0.750
	Cyclohexanone	0.750
	1,2 Dichlorobenzene	0.125
	2-Ethoxyethanol	Incineration
	Ethyl Acetate	0.750
	Ethyl Benzene	0.053
	Ethyl Ether	0.750
	Isobutanol	5.000
	Methanol	0.750
X	Methylene Chloride	0.960
	Methyl Ethyl Ketone	0.750
	Methyl Isobutyl Ketone	0.330
	Nitrobenzene	0.125
	2-Nitropropane	Incineration
	Pyridine	0.330
	Tetrachloroethylene	0.050
	Toluene	0.330
X	1,1,1-Trichloroethane	0.410
	1,1,2-Trichloroethane	7.600 (total)
X	1,1,2-Trichloro-1,2,2-Trifluoroethane	0.960
X	Trichloroethylene	0.091
	Trichlorofluoromethane	0.960
	Xylene	0.150

State of New Jersey
Department of Environmental Protection
Division of Hazardous Waste Management
Manifest Section
CN 028, Trenton, NJ 08625

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. S J D 0 7 0 7 1 4 4 5 3 — Manifest Document No. 1 0 0 1 1

2. Page 1 of 1 — Information in the shaded areas is not required by Federal law

3. Generator's Name and Mailing Address
ALLIED-SIGNAL AEROSPACE COMPA
ROUTE 46 TETERBORO, NJ 07608

4. Generator's Phone (201) 393-2724

5. Transporter 1 Company Name: MARISOL INCORPORATED — 6. US EPA ID Number: N J D 0 0 2 4 5 4 5 4 4

7. Transporter 2 Company Name — 8. US EPA ID Number

9. Designated Facility Name and Site Address
MARISOL INCORPORATED
125 FACTORY LANE
MIDDLESEX, NJ 08846 — 10. US EPA ID Number: N J D 0 0 2 4 5 4 5 4 4

A. State Manifest Document Number: NJA 0996964
B. State Generator's ID: SAME
C. State Trans. ID: NJDEPS
D. Transporter's Phone ( ) 908 469-3100
E. State Trans. ID
F. Transporter's Phone ( )
G. State Facility's ID
H. Facility's Phone ( ) 908 469-3100

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	Waste No.
a.	X RQ HAZARDOUS WASTE LIQUID, N.O.S. (Trichloroethane), ORM-E, F-001, NA 1993	0 0 1	DM	0 0 0 5 3 6	P	F 0 0 1
b.						
c.						
d.						

J. Additional Descriptions for Materials Listed Above
J/K: WASTE 09X
a. TRICHLOROETHANE — c.
b. — d.

K. Handling Codes for Wastes Listed Above
a. T 0 4 — c.
b. — d.

15. Special Handling Instructions and Additional Information
IN CASE OF EMERGENCY, THE 24 HOUR RESPONSE INFORMATION TELEPHONE IS CHEMTREC 1-800-424-9300, AND REFER TO ATTACHED DOT RESPONSE GUIDE

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Printed/Typed Name: JOE S. HUYND — Signature — Month Day Year: 10 10 92

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: M. Lamont — Signature — Month Day Year: 10 10 92

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name — Signature — Month Day Year

19. Discrepancy Indication Space

FACILITY

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Angelo Donelson — Signature — Month Day Year: 10 10 92

EPA Form 8700-22 (Rev. 9/88) Previous editions are obsolete — SIGNATURE AND INFORMATION MUST BE LEGIBLE ON ALL COPIES

In case of an emergency or spill immediately call the state fire emergency occurred in and the N.J. Dept. of Environmental Protection (609) 292-7172 (Night) (609) 292-9380 (Day)

State of New Jersey
Department of Environmental Protection
Division of Hazardous Waste Management
Manifest Section
CN 028, Trenton, NJ 08625

Use type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. N J D 0 7 8 7 1 4 4 3 1 0 0 1 1 — Manifest Document No.

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

A. State Manifest Document Number: NJA C996964

B. State Generator's ID: SAME

3. Generator's Name and Mailing Address
ALLIED-SIGNAL AEROSPACE COMPANY
ROUTE 46 [illegible]STERBORO, NJ 07600

4. Generator's Phone (201) 393-2724

5. Transporter 1 Company Name: MARISOL INCORPORATED — 6. US EPA ID Number: N J D 0 0 1 4 5 4 5 4 4

C. State Trans. ID: NJDEPS-[illegible]

7. Transporter 2 Company Name — 8. US EPA ID Number

D. Transporter's Phone: (908) 469-3100

E. State Trans. ID

9. Designated Facility Name and Site Address
MARISOL INCORPORATED
125 FACTORY LANE
MIDDLESEX, NJ 08846

10. US EPA ID Number: N J D 0 0 1 4 5 4 5 4 4

F. Transporter's Phone ( )

G. State Facility's ID

H. Facility's Phone (908) 469-3100

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	X RQ HAZARDOUS WASTE LIQUID, N.O.S., (TRI[illegible]ORO-ethane), ORM-E, F-001, UN 2831	0 1	DM	009536		F 0 0 1
b.						
c.						
d.						

J. Additional Descriptions for Materials Listed Above
L/T: WATER 5 [illegible]
a. TRICHLOROETHANE 14
b.

K. Handling Codes for Wastes Listed Above
a. T 0 4 c.
b. d.

15. Special Handling Instructions and Additional Information
IN CASE OF EMERGENCY, THE 24 HR RESPONSE INFORMATION TELEPHONE IS CHEMTREC 1-800-424-9300, AND REFER TO ATTACHED DOT RESPONSE GUIDE.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: MARK SCHWIND — Signature — Month Day Year 1 2 6 1 9 1

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name — Signature — Month Day Year

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name — Signature — Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name — Signature — Month Day Year

GENERATOR — TRANSPORTER — FACILITY

NJA 0996964

EPA Form 8700-22 (Rev. 9/88) Previous editions are obsolete.

SIGNATURE AND INFO[illegible] MUST BE LEGIBLE ON ALL COPIES

State of New Jersey
Department of Environmental Protection
Division of Hazardous Waste Management
Manifest Section
CN 028, Trenton, NJ 08625

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. N J D 0 2 8 7 1 4 4 3 3 | Manifest Document No. 1 0 0 9
2. Page 1 of 1
Information in the shaded area is not required by Federal law

A. State Manifest Document Number **NJA 0996961**

B. State Generator's ID: SAME

3. Generator's Name and Mailing Address
ALLIED-SIGNAL AEROSPACE COMPANY
ROUTE 46 TETERBORO, NJ 07608

4. Generator's Phone (201) 393-2724

5. Transporter 1 Company Name: MARISOL INCORPORATED
6. US EPA ID Number: N J D 0 0 2 4 5 4 5 4 4

C. State Trans. ID: NJDEPE-[illegible]
D. Transporter's Phone (908) 469-5100

7. Transporter 2 Company Name
8. US EPA ID Number

E. State Trans. ID

9. Designated Facility Name and Site Address
MARISOL INCORPORATED
125 WEST FACTORY LANE
MIDDLESEX, NJ 08846

10. US EPA ID Number: N J D 0 0 2 4 5 4 5 4 4

F. Transporter's Phone ( )
State Facility's ID
Facility's Phone (908) 469-5100

	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	Waste No.
a.	X RQ WASTE 1-1-1 TRICHLOROETHANE, ORM-A, F-001, UN 2831	012	DM	00630	G	F001
b.	X RQ WASTE METHYLENE CHLORIDE, ORM-A, F-001, UN 1593	001	DM	00053	G	F001
c.	X HAZARDOUS WASTE LIQUID, N.O.S., (TRIFLUOROTRICHLOROETHANE), ORM-E, NA 9189	002	DM	00105	G	F001
d.	X RQ TRICHLOROETHYLENE ORM-A, F-001, UN 1710	002	DM	00105	G	F001

J. Additional Descriptions for Materials Listed Above
a. L/T: 1,1,1 TRICHLOROETHANE 1[illegible]%
c. L/T: TRIFLUOROTRICHLOROETHANE 100%
b. L/T: METHYLENE CHLORIDE 1[illegible]
d. L/T: TRICHLOROETHYLENE 00[illegible]%

K. Handling Codes for Wastes Listed Above
a. T04 c. T04
b. T04 d. T04

15. Special Handling Instructions and Additional Information
MATERIAL TO BE BENEFICIALLY [illegible]LAIMED ACCORDING TO ASAC WASTE MINIMIZATION PLAN. IN CASE OF EMERGENCY, THE 24 HOUR [illegible] RESPONSE INFORMATION TELEPHONE IS CHEMTREC 1-800-424-9300, AND REFER TO ATTACHED [illegible] RESPONSE GUIDE.

16. GENERATOR'S CERTIFICATION: I hereby d[illegible] that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, pac[illegible]marked, and labeled, and [illegible]e in all respects in proper condition for transport by highway according to applicable international and na[illegible] government regulations.

If I am a large quantity generator, I certify that I have a program in place to redu[illegible]e volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of trea[illegible], storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is [illegible]ilable to me and that I can afford.

Printed/Typed Name: MARK SCHWIND | Signature | Month Day Year 06 08 92

17. Transporter 1 Acknowledgement of Receipt [illegible]aterials
Printed/Typed Name: M Tavantin | Signature | Month Day Year 06 08 92

18. Transporter 2 Acknowledgement of Receipt [illegible]aterials
Printed/Typed Name | Signature | Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of [illegible] hazardous materials cov[illegible] by this manifest except as noted in Item 19.
Printed/Typed Name | Signature | Month Day Year

GENERATOR
TRANSPORTER
FACILITY

In case of an emergency or spill immediately call the State the emergency occurred in and the N.J. Dept. of Environmental Protection. (609) 292-5560 (Day) (609) 292-7172 (Night)

MARISOL, INC.
125 FACTORY LANE
MIDDLESEX, NJ 08846
908-469-5100
FAX 908-469-1957

BROKER / DIRECT
MATERIAL PROFILE

No.

Generator Name: ALLIED-SIGNAL AEROSPACE COMPA

Generator EPA ID No.: NJD078714433

Mailing Address: ROUTE 46
TETERBORO, NJ 07608

Generator Contact: MARK SCHWIND

Title: ENVIRONMENTAL ENGINEER

Facility Address (If different from above):

Phone: (201) 393-2724

Description of Material: water and trichloroethane

Process Which Generates This Material (Be Specific): DEGREASER CLEANOUT

Volume: 55 GALLONS

Frequency: 1 TIME/3 MONTHS

Packing: (Drums) Bulk

ENTER ALL COMPOSITIONAL DATA IN WEIGHT PERCENT

Physical State @ 70° F: Solid | (Liquid) | Semi-Solid

Viscosity: Value: N/A Units:

Layering: (None) | Bilayered | Multilayered

Material is Not Compatible With The Following:

Suspended or Dissolved Solids By Volume: Minimum: Maximum: Total:

Settleable Solids by Volume: Minimum: N/A Maximum: Total:

Specific Gravity: Standard Units @ 60°F: 1.0

Flash Point: Temperature: N/A Method:

Thousands of BTU's per Pound: <1 | 1 - 5 | 5 - 9 | 9 - 12 | 12 - 16 | 16 - 20

pH: Standard Units: N/A

Organically Bound Chlorine by weight: Value: Method:

Odor: None Mild Strong
Describe:

Organically Bound Sulfur by Weight: Value: Method:

PLEASE IDENTIFY AND QUANTIFY ALL KNOWN COMPONENTS AND/OR CONTAMINANTS. IF ANALYSIS WAS PERFORMED OTHER THAN REQUESTED, PLEASE AMEND ACCORDINGLY.

CHEMICAL COMPOSITION (Attach Appropriate MSDS's)

SUBSTANCE (Totals must add to 100%)	Min.	Max.	Avg.
1,1,1 TRICHLOROETHANE			1
WATER			99

METALS AND OTHER SUBSTANCES ☐ Total ppm ☐ TCLP ☐ none

Arsenic (As)	Beryllium (Be)
Barium (Ba)	Cobalt (Co)
Cadmium (Cd)	Copper (Cu)
Chromium (Cr)	Manganese (Mn)
Lead (Pb)	Zinc (Zn)
Mercury (Hg)	Antimony (Sb)
Selenium (Se)	Other
Silver (Ag)	PCB's (ppb)
Nickel (Ni)	Cyanides
Thallium (Th)	Pesticides

PLEASE ATTACH ANY ADDITIONAL HAZARD AND HANDLING INFORMATION TO THIS SHEET

EPA Waste No.: F 001

DOT Proper Shipping Name: HAZARDOUS WASTE LIQUID, N.O.S., F 001

New Jersey Waste No.: N/A

DOT Hazard Class: ORM-E

UN/NA ID No.: UN 2831

TO THE BEST OF MY KNOWLEDGE AND ABILITY TO DETERMINE, THIS IS A COMPLETE AND ACCURATE DESCRIPTION OF THIS MATERIAL

Signature: N Schwind

Date: JUN 05 1989

Marisol Incorporate
125 Factory Lane
Middlesex, N.J. 08846

This notice is being sent to you in accordance with 40 CFR 268.7 to inform you that this shipment contains the solvents identified below which are restricted on landfill. You should be aware that the residues from the treatment of these materials may not be landfilled unless the concentration is below the applicable non-wastewater treatment standard(s).

Manifest contains the following EPA Hazardous Waste Numbers: (check box[es])

F001-> [X] F002-> [ ] F003-> [ ] F004-> [ ] F005-> [ ]

The following materials are contained in the waste stream:

	MATERIAL	NON-WASTEWATER TREATMENT STANDARD (mg/l)
	Acetone	0.590
	Benzene	0.700 (total)
	n-Butyl Alcohol	5.000
	Carbon Disulfide	4.810
	Carbon Tetrachloride	0.960
	Chlorobenzene	0.050
	Cresols (and Cresylic Acid)	0.750
	Cyclohexanone	0.750
	1,2 Dichlorobenzene	0.125
	2-Ethoxyethanol	Incineration
	Ethyl Acetate	0.750
	Ethyl Benzene	0.053
	Ethyl Ether	0.750
	Isobutanol	5.000
	Methanol	0.750
	Methylene Chloride	0.960
	Methyl Ethyl Ketone	0.750
	Methyl Isobutyl Ketone	0.330
	Nitrobenzene	0.125
	2-Nitropropane	Incineration
	Pyridine	0.330
	Tetrachloroethylene	0.050
	Toluene	0.330
X	1,1,1-Trichloroethane	0.410
	1,1,2-Trichloroethane	7.600 (total)
	1,1,2-Trichloro-1,2,2-Trifluoroethane	0.960
	Trichloroethylene	0.091
	Trichlorofluoromethane	0.960
	Xylene	0.150

P.O. BOX 19506 SPRINGFIELD, ILLINOIS 62794-9276 (217) 782-6761

State Form: LPC 62.8/1 IL532-0610

EPA Form 8700-22 (Rev. 9-88)

FOR SHIPMENT OF HAZARDOUS, INFECTIOUS AND SPECIAL WASTE.

PLEASE TYPE (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039, Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: NJD078714433
Manifest Document No.: 099 3
2. Page 1 of 1
Information in the shaded areas is not required by Federal law, but is required by Illinois law.

3. Generator's Name and Mailing Address: Allied-Signal Aerospace Company, Route 46, Teterboro, NJ 7608
Location If Different:
4. Generator's Phone: (201) 393-7247

A. Illinois Manifest Document No.: IL 3412239 MANIFEST SEPTEMBER
B. Illinois Generator's ID: 9340035417
C. Illinois Transporter's ID: 1540
D. Transporter 1 Company Name / Transporter 1 Phone
E. Illinois Transporter's ID
F. Transporter 2 Company Name / Transporter 2 Phone
G. Illinois Transporter's ID
H. Facility Name / Facility Phone: 8702500022

5. Transporter 1 Company Name: Freehold Cartage, Inc.
6. US EPA ID Number: NJD054126164
7. Transporter 2 Company Name
8. US EPA ID Number

9. Designated Facility Name and Site Address: CP Inorganics, 10 Industrial Ave., Joliet, IL 60436
10. US EPA ID Number: ILD062480850

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	Waste No.
a. RQ Waste Corrosive Liquid, N.O.S. (Cupric Chloride) (D002, D008) UN 1760, DOTE 9164	002	DF	00105	1	D002
b. (RQ=100#) Waste Ammonium Hydroxide Solution Corrosive Liquid (D002) NA 2672	008	DF	00420	1	D002
c.					
d.					

J. Additional Descriptions for Materials Listed Above: Ammonium Chloride Solution from Brass Chemical cleaning bath. Reason - disposal of waste. Bath (Sol) Ammonium Hydroxide 35%

K. Handling Codes for Wastes Listed Above: 1 = Gallons 2 = Cubic Yards

15. Special Handling Instructions and Additional Information
In case of spill, Refer to attached DOT Response Guide No 60, Contact 24 hr. emergency Response telephone # Chemtrec 1-800-424-9300.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: William A. Hoope
Signature: William A. Hoope
Date: Month 06 Day 22 Year 92

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Bob Sommers
Signature: Bob Sommers
Date: Month 06 Day 22 Year 92

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: S. Sakowski
Signature
Date: Month 6 Day 25 Year 92

This Agency is authorized to require, pursuant to Illinois Revised Statutes, Chapter 111½ Section 21, that this information be submitted to the Agency. Failure to provide the information may result in a civil penalty against the owner or operator of not to exceed $25,000 per day of violation. Falsification of this information may result in a fine up to $50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

COPY 1. TSD MAIL TO GENERATOR

JUN 25 '92

In case of a spill call the Illinois Office of Emergency Response at 217/782-3637 and the National Response Center at 800/424-8802.

LAND DISPOSAL RESTRICTION NOTICE

In accordance with 40 CFR 268.7 this notice is to inform you that these wastes are restricted from land disposal unless they are treated: 1.) to below the treatment standards specified in 268.41 or 2.) in accordance with the technology-based standard defined in 268.42, namely, FSUBS (Fuel substitution), INCIN (Incineration) and/or RORGS (Recovery of organics).

The wastes are:

	D001		U080		U196
X	D002		U083		U203
	U001		U084		U208
	U002		U085		U209
	U003		U088		U210
	U004		U092		U211
	U008		U102		U213
	U009		U107		U220
	U012		U108		U225
	U019		U110		U226
	U028		U112		U227
	U031		U113		U228
	U037		U117		U239
	U043		U118		U328
	U044		U121		U353
	U051		U122		U359
	U052		U124		
	U053		U125		
	U054		U140		
	U055		U152		
	U056		U154		
	U057		U159		
	U069		U161		
	U070		U162		
	U071		U169		
	U072		U171		
	U073		U186		
	U074		U188		
	U076		U191		
	U079		U194		

GENERATOR Allied Signal Aerospace MANIFEST No. [redacted] IL 3412239 WAB

SIGNATURE William A. Hooper DATE 5-22-92

RCRA INSPECTION FORM

Report Prepared for:

Generator [X]

Transporter [ ]

TSD facility [X]

Copy of report ~~[illegible]~~ sent to the facility [ ]

Facility Information

Name: Bendix Corp.

Address: Route 46
Teterboro, NJ

EPA ID#: NJD078714433

Date of Inspection: 4/8/82

Participating Personnel

State or EPA Personnel: Angela Morales

Facility Personnel: William Hooper
(Plant Manager)

Report Prepared by Name: Angela Morales

Agency: U.S. EPA E.S.D.O.

Telephone #: (201) 321-6623

Approved for the Director by: _____

Facility Description

The Bendix Corp., Guidance System Division, located in Teterboro, N.J. manufactures guidance equipment for missiles. Part of this manufacturing process involves plating operations which generate waste rinse waters and a concentrated plating bath. These wastes are put through Bendix's waste water treatment plant where the metals are precipitated and a metal hydroxide sludge is generated. The treated waste rinse water is discharged in accordance with their NPDES permit. The waste sludge which according to a company official, is hazardous, is sent to the SCA secure land fill in South Carolina.

There are instances when the concentrate plating baths are not put through the waste-water treatment plant (the latter not being able to handle the load), and are drummed and shipped out as hazardous.

The following is a summary of all the wastes that Bendix informed the EPA inspectors that they generated:

1) Metal Hydroxide Sludge - generated as a precipitate from Bendix's waste water treatmen plant. Approximately 55 fifty-five gallon

RCRA INSPECTION FORM

Report Prepared for:

Generator ☒

Transporter ☐

TSD facility ☒

Copy of report sent to the facility ☐

Facility Information

Name: Bendix Corp.

Address: Route 46
Teterboro, NJ

EPA ID#: NJD078714433

Date of Inspection: 4/8/82

Participating Personnel

State or EPA Personnel: Angela Morales

Facility Personnel: William Hooper
(Plant Manager)

Report Prepared by Name: Angela Morales

Agency: U.S. EPA E.S. Div.

Telephone #: (201) 321-6623

Approved for the Director by: _____

drums of this metallic sludge is generated every 6 months. None of this waste was on site during the time of the inspection.

2) Concentrated Plating Bath Solutions - generated when solution can no longer be regenerated. In other words, when the solution becomes contaminated and plating produces lumps on the circuit boards. There is no set schedule for disposal of this solution since contamination depends on product demand and use of the plating bath. Most of this waste goes through the treatment plant. Whatever cannot be handled through the wastewater treatment plant is drummed and sent out for disposal. There was no waste which was drummed for outside disposal during the time of the inspection.

3) Waste Solvents (1,1,1 Trichloroethane, ethylene and Freon) - generated from the degreasing and painting operations in the assembly works department. Solvents are used to clean all machine parts, printed circuit boards and any thing that requires degreasing. Approximately 2 fifty-five gallon drums of

1,1,1 trichloroethane, - ethylene is generated every 2 weeks. The freon waste on site was a one time occurrence.
During the site inspection, there were approximately 3 fifty-five gallon drums of 1,1,1-trichloroethylene, 10 fifty-five gallon drums of 1,1,1-trichloroethane and 4 fifty-five gallon drums of freon.

4) Poisonous Beryllium Waste Dust - generated from the machining of beryllium parts. A vacuum is placed on these machines which accumulates beryllium, metal chips and a fine oil residue. According to the company official, 90% of this waste dust consists of steel chips. Approximately 1-2 lbs of the beryllium waste dust is generated /month. But, in 1981 a total of 236 lbs of this waste was generated. A company official stated that Bendix was trying to do away with the beryllium machining. None of this waste was on site during the time of the inspection.

5) Waste Oils - generated from the lubrication of parts and replacement of the cooling oils in the sump pumps. In lubricating the parts, oil is pumped on the part and collected and reused. This oil is contaminated with metal chips. These waste oils are stored in an underground tank which also contains contaminated material from the paint department. The tank capacity is 10,000 gallons and approximately 5,000 gallons of this waste is generated/year. Approximately 3,300 gallons of waste was being stored in the tank during the time of the inspection.

6) Remove Resist Cleaner (1112A Stripper) - A maximum of 3 fifty-five gallon drums are generated/week. Bendix waits for 24 drums to accumulate and then calls SCA who pumps it into their own tank truck and transports it to a disposal site. During the time of the inspection, approximately 12 drums were on site.

7) Electroless Copper (Developer) - generated from the plating operation. Electroless Copper is a chemical plating solution that allows you to plate on plastic without a current. It also removes the Resist material from the patterns of the circuit boards. Approximately 2 - fifty-five gallon drums of waste are generated /week. Approximately 10 drums of this waste were on site.

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

Yes

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.

[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)

[X] The material or product is listed in the regulations as a discarded commercial chemical product (§261.33) 1,1,1 Trichloroethane, -ethylene

[ ] 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	N/A
Part 262			
Subpart A-General			
262.11 - Hazardous waste determination			
a) Did the generator test its waste to determine whether it is hazardous?		✓	
1) Is the waste hazardous? Listed under one of the sources	✓		
b) Is the generator determining that its waste exhibits a hazardous waste characteristic(s) based on its knowledge of the material(s) or processes used?	✓		
Subpart B-The Manifest			
Has hazardous waste been shipped off-site since November 19, 1980?	✓		

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. 26 shipments in 1981. 0 Shipments in 1980. 4 shipments in 1982. Total Shipments = 30 shipments

262.21 Does each manifest (or representative sample) have the following information? Please circle the missing elements.

	YES	NO	N/A
-- a manifest document number	✓		
-- the generators name, mailing address, telephone number and EPA I.D. #	✓		
-- the name, address and EPA ID# 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.	✓		
Subpart C - Pre-Transport Requirements			
262.30 - Is hazardous waste properly packaged according to DOT regulations? (49 CFR Part 172)	✓		
262.31 - Is hazardous waste properly labeled according to DOT regulations? (49 CFR Part 172)	✓		

	YES	NO	N/A
262.33 - Does the facility placard or offer the initial transporter appropriate placards according to the DOT regulations? (49 CFR Part 172)	✓		

262.34 - Accumulation Time

1) How is waste accumulated on-site? Greater than 90 days

containers [✓] (complete container questions below) surface impoundments [ ] (complete TSD form also)

tanks [✓] (complete tank questions on page 4) piles [ ] (complete TSD form also)

(waste cooling oil underground)

	YES	NO	N/A
2) Is waste accumulated for less than 90 days?		✓	

CONTAINER

	YES	NO	N/A
1) Is each container clearly dated with each period of accumulation so as to be visible for inspection?	✓		
2) Is each container marked or labeled with the words "hazardous waste" or in compliance with the DOT labeling requirements?	✓		

265.170 - What type of containers are used for storage. Describe the size, type and quantity.(e.g. 12 fifty-five gallon drums)

55 gallon drums (Please see report for exact quantities for each waste)

	YES	NO	N/A
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.

	YES	NO	N/A
265.172 - Are hazardous waste stored in containers made of compatible materials? Waste is stored in new metal 55 gallon drums	✓		

If not, please explain.

	YES	NO	N/A
265.173(a) - Are all containers closed except those in use?	✓		
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?	✓		

265.174 - How often is the storage area inspected?

Waste supervisor Charlie DeMartino inspects it daily. Not documented

	Yes	No	N/A
265.176 - Are containers holding ignitable and reactive waste located at least 50 feet (15 meters) away from the facility's property line?	✓		

Tanks

1) What is the approximate number and size of tanks containing hazardous waste? 10,000 gallon tank containing waste cooling oil.

	Yes	No	N/A
2) Are tanks maintained so that there is no evidence of present, past, or risk of future leaks? Please circle appropriate elements. Please explain.	✓		
3) Are there leaking tanks?		✓	
262.34 (a)(3) Is each tank marked or labeled with the words hazardous waste or with the DOT labeling requirements?		✓	
265.192(a) Does it appear that incompatible waste are being stored seperate from each other?	✓		
265.192(a) Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction?	✓		

If not, please explain.

	Yes	No	N/A
265.192(b) - Are all waste 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?	✓		

If not, please explain.

	Yes	No	N/A
265.192(c) Do uncovered tanks have at least 2 feet of freeboard or an adequate containment structure? Underground storage tank.			✓

265.194 - How often is the tank storage area inspected?

Waste Supervisor, Charles De Martino, inspects it daily - not documented

	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 the regulations or having been employed?	✓		
a) If yes, have facility personnel taken part in an annual review of training? Supervisors receive the training (documented) and claim to give on-the-job training to subordinates.		✓	
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?	✓		

265 – Subpart C – Preparedness and Prevention

265.32-Required Equipment

Does the facility comply with preparedness and prevention requirements including maintaining:

	YES	NO	N/A
-- 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.	✓		
-- adequate aisle space?	✓		

If not, please explain storage pattern.

	YES	NO	N/A
-- in your opinion, do the types of waste on-site require all of the above procedures, or are some not needed? Explain.	✓		

	YES	NO	N/A
265.34 Access to Communications or Alarm Systems			
a) Is there immediate access to communications or alarm systems during handling of hazardous waste? Sometimes- It depends on whether the doors to the building containing the phone are open. The doors are open during the day and closed during the night			
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? Bendix has local fire department meetings and inspections. a) How do you know?		✓	
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?	✓		
7) Have changes occurred that would require amendments to the contingency plan?			✓
262 - Subpart- D-Recordkeeping and Reporting			
262.40-Recordkeeping			
1) Does the generator maintain facility records since Nov. 19, 1980? (manifest, exception report and waste analysis)	✓		
262.42- Exception Reporting			
1) Has the generator received signed copies (from the TSD facility) of all the manifests for waste shipped off-site more than 35 days ago?	✓		
a) If not, have Exception Reports been submitted to EPA covering any of these shipments made more than 45 days ago?			✓

RCRA TREATMENT, STORAGE AND DISPOSAL FACILITY INSPECTION FORM
FOR CSD FACILITIES ONLY

COMPANY NAME: Bendix Corp

EPA I.D. Number: NJD078714433

COMPANY ADDRESS: Route 46 Peterboro, NJ.

COMPANY CONTACT OR OFFICIAL: William Harper

TITLE: Plant Manager.

OTHER ENVIRONMENTAL PERMITS HELD BY FACILITY: ☑ NPDES ☐ AIR ☐ OTHER

INSPECTOR'S NAME: Angela Morales

DATE OF INSPECTION: 4/8/82

BRANCH/ORGANIZATION: E.S. Division

TIME OF DAY INSPECTION TOOK PLACE: 1:30 p.m.

(1) Is there reason to believe that the facility has hazardous waste on site? Yes

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

☑ 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)

☐ 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
b. Is there reason to believe that there are hazardous wastes on-site which the company claims are merely products or raw materials?		✓	

Please explain:

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

Please see report.

(2) Does the facility generate hazardous waste?	✓		
(3) Does the facility transport hazardous waste?		✓	
(4) Does the facility treat, store or dispose of hazardous waste?	✓		

VISUAL OBSERVATIONS

	YES	NO	DON'T KNOW
(5) SITE SECURITY (§265.14)			
a. Is there a 24-hour surveillance system?	✓		
b. Is there a suitable barrier which completely surrounds the active portion of the facility?	✓		
c. Are there "Danger-Unauthorized Personnel Keep Out" signs posted at each entrance to the facility?		✓	
(6) Are there ignitable, reactive or incompatible wastes on site? (§265.27)	✓		
a. If "YES", what are the approximate quantities?			
b. If "YES", have precautions been taken to prevent accidential ignition or reaction of ignitable or reactive waste?	✓		
c. If "YES", explain Solvent waste is kept separate from source of ignition			
d. 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 mists, fumes, dusts, or gases in sufficant quantities to threaten human health?	✓		
- produce uncontrolled flammable fumes 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?	✓		

Please explain your answers, and comment if necessary.

e. Are there any additional precautions which you would recommend to improve hazardous waste handling procedures at the facility?

Please see report

(7) Does the facility comply with preparedness and prevention requirements including maintaining: (§265.32)

	YES	NO	DON'T KNOW
- an internal communications or alarm system?		✓	
- a telephone or other device to summon emergency assistance from local authorities?	✓		
- portable fire equipment?	✓		
- adequate aisle space?	✓		
- in your opinion, do the types of wastes on site require all of the above procedures, or are some not needed? Explain.	✓		

~~In your opinion, do the types of wastes on site require all of the above procedures, or are some not needed? Explain.~~

*(8) Have you inspected to verify that the groundwater monitoring wells (if any) mentioned in the facility's groundwater monitoring plan (see no. 19 below) are properly installed? N/A			
If you have, please comment, as appropriate. N/A			
(9) a. Is there any reason to believe that groundwater contamination already exists from this facility? If "YES", explain. N/A			
b. Do you believe that operation of this facility may affect groundwater quality?			
c. If "YES", explain.			

RECORDS INSPECTION

(10) Has the facility received hazardous waste from an off-site source since Nov. 19, 1980 (effective date of the regulations)?		✓	
a. If "YES", does it appear that the facility has a copy of a manifest for each hazardous waste load received? N/A			
b. How many post-November 19 manifests does it have? If the number is large, you may estimate. N/A			
c. Does each manifest (or a representative sample) have the following information? N/A			
- a manifest document number			

	YES	NO	DON'T KNOW
- the generator's name, mailing address, telephone number, and EPA identification number			
- the name, and EPA identification number of each transporter			
- the name, address and EPA identification number of the designated facility and an alternate facility, if any;			
- a DOT description of the wastes			
- 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, packaged, marked, and labeled, and are in proper condition for transportation under regulations of the Department of Transportation and the EPA			
d. Are there any indications that unmanifested hazardous wastes have been received since November 19, 1980? If YES, explain.		✓	
(11) Does the facility have a written waste analysis plan specifying test methods, sampling methods and sampling frequency? (§265.13)		✓	
a. Does the character of wastes handled at the facility change from day to day, week to week, etc., thus requiring frequent testing? (You may check more than one) Waste characteristics vary ____ All wastes are basically the same ✓ Company treats all waste as hazardous ____ Don't know ____			
b. Does hazardous waste come to this facility from off-site sources?		✓	
c. If waste comes from an off-site source, are there procedures in the plan to insure that wastes received conform to the accompanying manifest?	N/A		
(11) INSPECTIONS (§265.15)			
a. Does the facility have a written inspection schedule?		✓	
b. Does the schedule identify the types of problems to be looked for and the frequency for inspections?		✓	
c. Does the owner/operator record inspections in a log?		✓	
d. Is there evidence that problems reported in the inspection log have not been remedied? If "YES," please explain.		✓	

	YES	NO	DON'T KNOW
(13) PERSONNEL TRAINING (§265.16)			
a. 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?	✓		
(14) Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosion or any unplanned release of hazardous waste? (§265.51)	✓		
a. Does the plan describe arrangements made with local authorities?		✓	
b. Has the contingency plan been submitted to local authorities?		✓	
How do you know?			
c. Does the plan list names, addresses, and phone numbers of Emergency Coordinators?	✓		
d. Does the plan have a list of what emergency equipment is available?		✓	
e. Is there a provision for evacuating facility personnel?	✓		
f. Was an Emergency Coordinator present or on call at the time of the inspection?	✓		
(15) Does the owner/operator keep a written operating record with: (§265.73)			
- a description of wastes received with methods and dates of treatment, storage or disposal? N/A		✓	
- location and quantity of each waste?		✓	
- detailed records and results of waste analysis and treatability tests performed on wastes coming into the facility? N/A			
- detailed operating summary reports and description of all emergency incidents that required the implementation of the facility contingency plan?		✓	
*(16) Does the facility have written closure and post-closure plans? (§265.110)	✓		
a. Does the written closure plan include:			
- a description of how and when the facility will be partially (if applicable) and ultimately closed?		✓	

	YES	NO	DON'T KNOW
- an estimate of the maximum inventory of wastes in storage or treatment at any time during the life of the facility?		✓	
- a description of the steps necessary to decontaminate facility equipment during closure?		✓	
- a schedule for final closure including the anticipated date when wastes will no longer be received and when final closure will be completed?		✓	
b. What is the anticipated date for final closure?		✓	
*c. Does the owner/operator have a written post-closure plan identifying the activities which will be carried on after closure and the frequency of these activities?			
d. Does the written post-closure plan include:			
- a description of planned groundwater monitoring activities and their frequencies during post-closure?			
- a description of planned maintenance activities and frequencies to ensure integrity of final cover during post-closure?			
- the name, address and phone number of a person or office to contact during post-closure?			
*(17) Does the owner/operator have a written estimate of the cost of closing the facility? (§265.142) What is it?		✓	
*(18) Does the owner/operator have a written estimate of the cost for post-closure monitoring and maintenance? What is it? (§265.144)			
*(19) Has a groundwater monitoring plan been submitted to the Regional Administrator for facilities containing a surface impoundment, landfill or land treatment process? (This requirement does not apply to recycling facilities.) (§265.90)			
a. Does the plan indicate that at least one monitoring well has been installed hydraulically upgradient from the limit of the waste management area?			
b. Does the plan indicate that there are at least three monitoring wells installed hydraulically downgradient at the limit of the waste management area?			

* This section applies only to disposal facilities.

* Effective date for this requirement is May 19, 1981.

SITE-SPECIFIC

Please circle all appropriate activities and answer questions on indicated pages for all activities circled. When you submit your report, include only those site-specific pages that you have used.

STORAGE	TREATMENT	DISPOSAL
Waste Pile p. 9	Tank p. 8	Landfill pp. 10-11
Surface Impoundment p. 8	Surface Impoundment pp. 8-9	Land Treatment pp. 9, 10
Container p. 7	Incineration pp. 12-13	Surface Impoundment p. 8
Tank, above ground p. 8	Thermal Treatment pp. 12-13	Other _____
Tank, below ground p. 8	Land Treatment pp. 9-10	
Other _____	Chemical, Physical p. 13 and Biological Treatment (other than in tanks, surface impoundment or land treatment facilities)	
	Other _____	

CONTAINERS (§265.170)

	YES	NO	DON'T KNOW
1. Are there any leaking containers? If "YES", explain.		✓	
2. Are there any containers which appear in danger of leaking? If "YES", explain.		✓	
3. Do wastes appear compatible with container materials?	✓		
4. Are all containers closed except those in use?	✓		
5. Do containers appear to be opened, handled or stored in a manner which may rupture the containers or cause them to leak?		✓	
6. How often does the plant manager claim to inspect container storage areas? Daily but there is no documentation of such.			
7. Does it appear that incompatible wastes are being stored in close proximity to one another? If "YES", explain.		✓	
8. Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line?	✓		
9. What is the approximate number and size of containers with hazardous wastes?			

TANKS (§265.190)	YES	NO	DON'T KNOW
1. Are there any leaking tanks? If "YES", explain. Underground tank, difficult to determine if it is leaking.			✓
2. Are there any tanks which appear in danger of leaking. If "YES", explain. Same reason as above.			✓
3. Are wastes or treatment reagents being placed in tanks which could cause them to rupture, leak, corrode or otherwise fail? If "YES", explain.		✓	
4. Do uncovered tanks have at least 2 feet of freeboard or an adequate containment structure? Not Applicable			
5. Where hazardous waste is continuously fed into a tank, is the tank equipped with a means to stop this inflow? Not Applicable			
6. Does it appear that incompatible wastes are being stored in close proximity to one another, or in the same tank? If "YES", explain.		✓	
7. How often does the plant manager claim to inspect container storage areas? Daily but this is not documented.			
8. Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction? If "YES", explain.	✓		
9. What is the approximate number and size of tanks containing hazardous wastes? One 10,000 gallon tank			

SURFACE IMPOUNDMENTS (§265.220)			
1. Is there at least 2 feet of freeboard in the impoundment?			
2. Do all earthen dikes have a protective cover to preserve their structural integrity? If "YES", specify type of covering.			
3. Is there reason to believe that incompatible wastes are being placed in the same surface impoundment? If "YES", explain.			

	YES	NO	DON'T KNOW
4. Are ignitable or reactive wastes being placed in surface impoundments without being treated to remove these characteristics? If "YES", explain.	___	___	___
5. Are there any leaks, failures or is there any deteriorization in the impoundments? If "YES", explain.	___	___	___
6. Give the approximate size of surface impoundments (gallons or cubic feet).			

WASTE PILES (§265.250)

1. Is the waste pile protected from wind erosion?	___	___	___
a. Does it appear to need such protection?	___	___	___
b. Explain what type of protection exists.			
2. Does it appear that incompatible wastes are being stored in the same waste pile? If "YES", explain.	___	___	___
3. Is leachate run-off from a pile a hazardous waste? If "YES", explain this determination and answer (a) and (b) below.	___	___	___
a. Is the pile placed on an impermeable base that is compatible with the waste?	___	___	___
b. Is the pile protected from precipitation and run-on?	___	___	___
4. In your judgment, are ignitable or reactive wastes managed in such a way that they are protected from any material or conditions which may cause them to ignite? Please explain or indicate if no such wastes are present.	___	___	___
Are they placed on an existing pile so that they no longer meet the definition of ignitable or reactive waste? Please explain.	___	___	___

5. How many waste piles are on site, and approximately how large are they?

LAND TREATMENT (§265.270)

1. Can the facility operator demonstrate that the hazardous waste has been made less or

	YES	NO	DON'T KNOW
*2. Is run-on diverted away from the active portions of the land treatment facility?	___	___	___
*3. Is run-off collected?	___	___	___
4. Are food chain crops being grown on the facility property?	___	___	___
a. If "YES", can the facility operator document that arsenic, lead and mercury:			
- will not be transferred to the crop or ingested by food chain animals or	___	___	___
- will not occur in greater concentrations in the crops grown on the land treatment facility than in the same crops grown on untreated soils.	___	___	___
b. Has notification of the growing of the food chain crops been made to the Regional Administrator?	___	___	___
5. Is there a written and implemented plan for unsaturated zone monitoring?	___	___	___
6. Are there records of the application dates, application rates, quantities and location of each hazardous waste placed in the facility?	___	___	___
7. Do the closure and post-closure plans address:			
a. control of migration of hazardous wastes into the ground-water?	___	___	___
b. control of run-off, release of airborne particulate contaminants?	___	___	___
c. compliance with requirements for the growth of food-chain crops (if they are present)?	___	___	___
8. Is ignitable or reactive waste immediately incorporated into the soil so the resulting waste no longer meets that definition? If "YES", explain.	___	___	___
9. Are incompatible wastes placed in the same land treatment area? If "YES", explain.	___	___	___
10. What is the area of the land receiving hazardous waste treatment?	___	___	___

LANDFILLS (§265.300)

*1. Is run-on diverted away from the active portions of the landfill?	___	___	___
*2. Is run-off from active portions of the landfill collected?	___	___	___

* Effective date for these requirements is May 19, 1981.

	YES	NO	DON'T KNOW
3.. Is waste which is subject to wind dispersal controlled? Explain.	___	___	___
4.. Does the owner/operator maintain a map with:			
- the exact location and dimensions of each cell	___	___	___
- the contents of each cell and approximate location of each hazardous waste type	___	___	___
5.. Do the closure and post-closure plans address:			
- control of pollutant migration via ground water?	___	___	___
- control of surface water infiltration?	___	___	___
- prevention of erosion?	___	___	___
6.. Is ignitable or reactive waste treated before being placed in the landfill? Explain how you know.	___	___	___
7.. Are precautions taken to insure that incompatible wastes are not placed in the same landfill cell? If "NO", explain.	___	___	___
8.. Are bulk or non-containerized wastes containing free liquids placed in the landfill? If "YES",	___	___	___
a. Does the landfill have a liner which is chemically and physically resistant to the added liquid?	___	___	___
b. Is the waste treated and stabilized so that free liquids are no longer present?	___	___	___
*9. Are containers holding liquid waste or waste containing free liquids placed in the landfill?	___	___	___
10. Are empty containers (e.g. those containing less than 1/2 inch of liquid) placed in the landfills?	___	___	___
If so, are they crushed flat, shredded or similarly reduced in volume before they are buried?	___	___	___

11. What is the approximate area of the hazardous waste landfill?

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* Effective date for this requirement is November 19, 1981.

INCINERATORS AND THERMAL TREATMENT
(§§265.340 and 265.379)

	YES	NO	DON'T KNOW
1. What type of incinerator or thermal treatment is at the site (e.g. waterwall incinerator, boiler, fluidized bed, etc.)?			
2. Was hazardous waste being incinerated or thermally treated during your inspection? If "YES", answer all following questions. If "NO", answer only questions 3 and 7.	___	___	___
3. Has waste analysis been performed (and written records kept) to include:			
- heating value of the waste	___	___	___
- halogen content	___	___	___
- sulfur content	___	___	___
- concentration of lead	___	___	___
- concentration of mercury	___	___	___

NOTE: Waste analysis need not be performed on each waste load if if there are documented data available to show waste characteristics that do not vary. If there are such documented data available, check here [ ].

4. Does it appear that the owner/operator brings his thermal treatment process to steady state (normal) conditions of operation before introducing hazardous wastes?	___	___	___
5. Did it appear during your inspection that there was adequate monitoring and inspection by owner/operator every 15 minutes during hazardous waste incineration for:			
- waste feed	___	___	___
- auxiliary fuel feed	___	___	___
- air flow	___	___	___
- incinerator temperature	___	___	___
- scrubber flow	___	___	___
- scrubber pH	___	___	___
- relevant level controls	___	___	___
Every hour for:			
- stack plume (color and opacity)	___	___	___
6. Is there open burning of hazardous waste?	___	___	___

a. If "YES", what is being burned? (only burning or detonation of explosives is permitted)

b. If open burning or detonation of explosives is taking place, approximately what is the distance from the open burning or detonation to the property of others?

	YES	NO	DON'T KNOW
6. Does the incinerator appear to be operating properly? (Do emergency shutdown controls and system alarms seem to be in good working order?) Please explain.	___	___	___
a. Is there any evidence of fugitive emissions?	___	___	___
7. Is the residue from the incinerator treated by the owner as a hazardous waste? Please explain.	___	___	___
8. What types of air pollution control devices (if any) are installed on the incinerator?			

CHEMICAL, PHYSICAL AND BIOLOGICAL TREATMENT (§265.400)

1. Does the treatment process system show any signs of ruptures, leaks, or corrosion? Please explain.	___	___	___
2. Is there a means to stop the inflow of continuously-fed hazardous wastes?	___	___	___
3. Is there ignitable or reactive waste fed into the treatment system?	___	___	___
If "YES", has it been treated or protected from any material or conditions which may cause it to ignite or react? If so, explain how.	___	___	___
Are the incompatible wastes placed in the same treatment process? If "YES", explain.	___	___	___

5. Describe the treatment system at this facility.

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

06/22/98

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 ->	NJD078714433
FACILITY NAME ->	ALLIED SIGNAL DEFENSE & SPACE
MAILING ADDRESS ->	699 RTE 46 E TETERBORO, NJ 07608
INSTALLATION ADDRESS ->	699 RTE 46 E TETERBORO, NJ 07608

EPA Form 6700-12AB (4-80)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NEW YORK 10007-1866

ATTN: DIV OF ENVIRON PLANNING & PROTECTION
RCRA PROGRAMS BRANCH
RCRA NOTIFICATIONS

TO: SHOVAN, ROBERT
HS & E ENGINEER
ALLIED SIGNAL DEFENSE & SPACE
699 RTE 46 E
TETERBORO, NJ 07608

NJD078714433
ALLIED SIGNAL DEFENSE & SPACE
TETERBORO NJ

NJD078714433
ALLIED SIGNAL DEFENSE & SPACE
TETERBORO NJ

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

Form Approved, OMB No. 2050-0034 Expires 10/31/98

Notification of Regulated Waste Activity

EPA — United States Environmental Protection Agency

Date Received (For Official Use Only): RO II

Change (owner name)

NJD078714433

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

A. Initial Notification [ ] B. Subsequent Notification [X] (Complete Item C)

C. Installation's EPA ID Number: N J D 0 7 8 7 1 4 4 3 3

II. Name of Installation (Include company and specific site name): ALLIED SIGNAL DEFENSE & SPACE

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street: 699 ROUTE 46 EAST

Street (Continued):

City or Town: TETERBORO State: NJ Zip Code: 07608 –

County Code: County Name: BERGEN

IV. Installation Mailing Address (See Instructions)

Street or P.O. Box: 699 ROUTE 46 EAST

City or Town: TETERBORO State: NJ Zip Code: 07608 –

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (Last): SHOVAN (First): ROBERT

Job Title: HS&E ENGINEER Phone Number (Area Code and Number): 201 – 393 – 2900

VI. Installation Contact Address (See Instructions)

A. Contact Address Location: [ ] Street [X] Mailing B. Street or P.O. Box:

City or Town: State: Zip Code: –

VII. Ownership (See Instructions)

A. Name of Installation's Legal Owner: ALLIED SIGNAL DEFENSE & SPACE

Street, P.O. Box, or Route Number: 699 ROUTE 46 EAST

City or Town: State: Zip Code:

TETERBORO NJ 07608 –

Phone Number (Area Code and Number): 201 – 393 – 2900

B. Land Type: P C. Owner Type: P D. Change of Owner Indicator: Yes [ ] No [X] (Date Changed) Month Day Year

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

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

Form Approved, OMB No. 2050-0028 Expires 10/31/99
GSA No. 0246-EPA-01T

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
HAZARDOUS WASTE INSPECTION REPORT

EPA

DWM-225

GENERATOR INSPECTION REPORT

FACILITY INFORMATION

FACILITY NAME: Allied Signal / Bendix

FILE NUMBER: 02-62-04

VHT FACILITY FILE NUMBER:

PERMIT #:

REGION: MFO

INSPECTION DATE: 12-6-89 / 12-7-89

INCIDENT/CASE NUMBER:

JAN 03 REC'D

INSPECTION TYPE: Generator

RESPONSIBLE AGENCY CODE: MFO

INSPECTOR'S NAME: Jodie M. Stein

INSPECTOR'S AGENCY: State

INSPECTOR'S BUREAU: DHWM

EPA ID NUMBER: NJD078714433

ADDRESS: Rt 46
Teterboro, NJ 07608

1+2 - 4

LOT: 1+2 BLOCK: 4

COUNTY: Bergen

FACILITY PERSONNEL: MARK Schwing
Matt Watson

TELEPHONE #:

OTHER STATE/EPA PERSONNEL:

REPORT PREPARED BY: Jodie Stein

REVIEWED BY: A Sterling

DATE OF REVIEW: 2/6/90

REVISION: 3
01/88

TIME IN: 8:30 / 8:42

TIME OUT: 4:00 / 4:50

PHOTOS TAKEN (__) YES (✓) NO IF YES, HOW MANY? _____

SAMPLE TAKEN (__) YES (✓) NO NO. OF SAMPLES _____

NJDEP SAMPLE ID#: _____

MANIFESTS REVIEWED (✓) YES (__) NO

Number of manifests in compliance 274

Number of manifests not in compliance 1

List manifest document numbers of those manifests not in compliance.

CT B 007 5809 * ← rescinded

NJ A 0480657

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS:

On 12/6/89 + 12/7/89 I conducted a RCRA inspection of Allied Signal/Bendix Aerospace Co (hereafter Bendix). The facility personnel I spoke to on 12-6-89 was Mark Schwind, + on 12-7-89 was Matt Watson, both Environmental Engineers.

Bendix is a large facility composed of 3 divisions: ① Flight Systems - this area manufactures materials for military airplanes, such as F16, F15, DC3 (civil +) planes, missiles, etc. ② Test Stand Systems - this area makes + assembles test stands. Printed circuit boards come from Plant 2 after they're manufactured, go to Plant 4, get wired, assembled and then go to Plant 5 for testing. How it works is basically simple. A plane gets pulled in, connected to the stand, + the test stand tells what may or may not be wrong with the plane. ③ Guidance Systems - This is the major area of the facility, although

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS (continued):

Bendix also has a printed circuit board drilling area if the boards need precision drilling, but no haz. waste is generated here. Printed circuit boards also go into the Potting rooms (see layout diagram where they were put into machines and dipped into xylol, and then drip-dried The xylol formed a hard rubber-like coating. Excess Xylol, or "spent" xylol goes into either a 55 gal. drum or lab packs, and gets shipped out via manifest The machine uses approx. 5 gal. per machine (2), per month. These machines have hoods, permit #00004. After these boards are dry, they go under an U.V. light to check for imperfection. + get baked in electrically induced ovens. After they're baked, they get washed in a "board washer" machine which uses mild detergents + H_2O. The H_2O gets reused because once the board is baked nothing comes off of it.

(PLANT I)

Also located in Plant I is a highly Classified area where Mr. Schwind said

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS (continued):

(4) Chromium Batch
↓
Chromium reduction
↓
neutralization (general)
↓
Flocculation
↓
sedimentation (sludge)
↓
neutralization
↓
discharge into sanitation

(5) General rinse batc
↓
Sedimentation (if any
↓
discharge into sanita

The tanks are as follows:
2 sludge (metal hydroxide, waste stream #9) - 5000gal.
1 Alkaline - 3000gal.
1 Acid - 3000 gal
1 Sulfuric Acid - 200 gal
1 Caustic Soda - 200gal
1 Clarifier tank - 9500gal
1 Flocculation - 350 gal
1 Chromium - 200gal
1 Cyanide - 200 gal
1 Neutralization - 3000 gal

70,000 gallons are discharged into sanitation system daily. The sludge, when one 5000gal. tank is full, it gets tested by Enviro Corp. & pumped out into tanker trucks. Approximately 4000gal. are pumped out every 2-4 months.

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS (continued):

From here the tank H_2O gets pumped through pipes into the waste water treatment facility (herein w.w.t.f.) and goes to 5 different treatment areas:

① Chelated batch

1st stage

↓

deepfreeze w/ ferrous sulfate

↓

decreasing PH below 4

2nd stage

↓

increase PH w/ lyme to 9.5

↓

polysulfide

↓

flocculation

↓

sedimentation (sludge) ← lined tank

↓

neutralization

↓

discharge into sanitation

② Alkaline batch

↓

Treatment

↓

Sludge

↓

pumped out w/ truc

③ Cyanide Batch

↓

Cyanide distruction → increase PH to 11.5 w/ caustic s

↓

decrease PH with sulfuric ac

↓

cyanate

↓

nitrogen

↓

neutral

↓

Flocculation

↓

Sedimentation (sludge)

↓

neutralization

↓

discharge into sanitation.

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS (continued):

Once the board is finished, it may go to the plating house to be plated. General plating goes thru sulfuric anodizing → clean → Patlin (forms black coating on cast iron + steel + is caustic) → SEALed (emerge board to be treated in a tank with vacuum pressure. Then introduce impregnating materials, pressurize, + then reverse pressure to become air + H_2O tight. Then the resin gets cured to remain in the board. H_2O + alkali detergents are used, + are discharged into the lift station pretreatment facility.)

80-90 percent of Bendix's waste H_2O come from the Printed Circuit board area and the plating house. This waste H_2O goes into the lift station pre-treatment facility into 4 tanks:

Chelated tank (500 gal.) - where metals are forced to stay in suspension.

General rinse H_2O tank (500 gal.)

Chrome rinse H_2O tank (100 gal.)

Cyanide rinse H_2O tank (100 gal.)

-A. 4

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS (continued):

all H_2O rinses go into the lift station pretreatment facility (to be discussed later.) Everything else is recycled until it is spent + then shipped out as Haz. waste. Once this process is finished, the silicon boards with copper coating go into a permanganate bath to remove epoxy smears. Then the boards go into the electroless copper, (which builds up the copper coating = waste stream #5) → electrolytic copper → "D lead" plating (which forms a mass + removes backing) → reflow area (infra-red system melts 10 lead to seal mass on copper board.) These boards went to each bath down an assembly line. The liquids were all in rectangular tanks of various sizes. The material in each tank was reused for several months until it was spent or evaporated. No specific amount of each was given because it all depended on how much + how many times it was used, etc. However, when it was spent, it got shipped out as haz. waste.

-A 6

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS (continued):

There is a plating House: within this area they use copper, nickel, silver, tin plate, cadmium + gold plating. This area generates waste streams # 6, 9, 10 + 11.

There is also a Printed Circuit board area within the plating house. Basically they purchase silicon boards with copper coating. Then a photograph is instilled upon this board via ultra violate light. Then this board goes into an etching bath (etching machine I) for cleaning etching → conveyor → detergent cleaner → H_2O rinse → sodium persulfate (waste stream # 2b. Approx. 55 gal used every other day.) → H_2O rinse → hot air drying. Once cleaned, the board goes into an etching machine (etching machine II), which uses cupric chloride cleaners (waste stream 2a) → chlorine gas + HCL → chambers → H_2O rinse → air dry. If the board is made of lead tin, it goes into an alkaline etcher (etching machine III) → alkaline etch (ammonium hydroxide) → H_2O rinse → dry.

-A. 5

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS (continued):

freon, acetone, + alcohol/year. The 111, T.C.E gets tested in house via 2-30 gal sumps. If its clean, it stays, + if its spent it gets shipped out. This is waste stream # 7.

If the component need not be degreased or tumbled, it may go to the paint shop, located in Plant 7 (see plant layout diagram.) Components come in dried + get painted according to military specs. Within this room are 3 spray booths, and a few baking ovens. Most of the paints used are either laquer or enamel, and the constituents are as follows: Xylene, pigments, isopropyl alch., nitrocellulose, toluol alkyd resin, xylol, caster oil, M.E.K, butyl acetate + lead. (The flashpt is 45°.) This gets shipped out in 2 way: First unused portions are lab packed*, and second out dated paints get shipped (opened or unopened.) This is waste stream # 8. Once the component is painted, it can go to a variety of places - assembly, plating, to the customer, etc.

* waste stream # 12

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS (continued):

There are other machines in machine Shops throughout [redacted] plant 7 that do milling, grinding etc. & generate the cutting oils and machine oils (approx. 5gal/mo.).

Once the components are done from the machines, they can go to a variety of areas. One area is located in the same room, which is the tumbler. Depending upon military specs, these components get entered into the tumbler machines w/ tumbling stones, and detergent & H_2O. This detergent/H_2O solution gets discharged into sanitation NJPDES # 0002097, after it is filtered out throug a sedimentation basin (cleaned every 3-5 yrs.). From here, components can go to QA/Q.C.; plating; to painting; or just to the degreaser.

There are 6 degreasers throughou plants 1, 4 & 5, all but 7 is vented. They use freon, Isopropyl alcohol, 1,1,1 trichloroethylene, trichloroethane 113 methylene chloride, nitromethane, & acetone. They use approx. 600g. of each

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS (continued):

90% of the Haz. waste generated. The Test Stand division is located in plants 4+5. (See PLANT Layout in report.)

There are several processes that generate haz. waste at this facility: In the machine room; there are 7 cuttin machines called Le Blond Makino MC 65 systems, and 5 CNC lathes. Because these machines are high tech, there is a person standing there pushing buttons. Within these machines, there is a H_2O soluble chemical emulsion K.A trim solve. This material is what runs the machines, and is used as a coolant + lubricant. The trim solve gets recycled in an aboveground reservoir as follows: The trim solve gets entered in the top of the reservoir, centrifuged, reusable oil comes out on the bottom + gets recycled back into the machines. The spent oil gets shipped out as Haz. waste approx. 5 gal / month. This is waste stream #8. These machines do boring, cutting + drilling.

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS (continued):

all 3 divisions are intertwined. In this area, was automated & beryllium machine, gyro & platform assembly, manufacturing of printed circuit boards, hybrid microcircuit production, manufacture & assembly of electrical components, metallurgic & chemical engineering, and acceptance & qualification testing. Within this division, there are also special facilities (Highly Classified areas) that do special tests for the Solid Rocket Booster IEA, for the NASA space shuttle program. Gyroscopic devices, control systems, digital computers, and power supplies are amongst the components used in the Pershing missile. In addition to the components in the Pershing missile, components for submarines are manufactured, & Gyrocompasses for rocket launching systems are also manufactured here. The Flight System division & Guidance System Division are located in plant 7. G.S.D. accounts for

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS (continued):

they use very small quantities of freon & isopropyl alcohol to clean off solderings, (used on rags.) The "spent" or unused portions are shipped out as lab packs.

There are a few Pershing White rooms in PLANT 7 where they assemble gyros, and during this process they use a degreaser (4000 gal. tank) of which 800 gal. are used per month.

There is also a room where they do blue printing, and in this room is a blue line machine which permanently blue prints on material backing. The only haz. waste generated here is ammonia, about 1 gal per month which goes out as a lab pack.

In the engineering annex, components come from plant 7 and get assembled here. For example, application of electrical components, or the need for minor solder cleaning, etc. They use isopropyl alcohol, approx. 2 gal/month kept in a 5 gal. safety can. Any used isopropyl alcohol is accumulated in a 55 gal. drum, or in lab packs (waste stream #12), and sent out.

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS (continued):

Within the engineering annex are also environmental chambers where components are heat, cold, altitude, vibration + electromagnetic tested, but no haz. waste is generated.

In plant 5, the only haz. wastes come from the 2 degreasers, which contain 111 TCE, alcohols, and are changed once a month. 1 degreaser is 10 gal. + 1 is 25 gal. Lab packs of paint thinners, + solder dross are also shipped out. The paint thinners also go out in 55 gal. drums (see "paint shop")

All Haz. wastes are picked up at each dept. by John Sebacht, haz. waste materials handler, + brought outside to the haz waste storage area. This area was labeled properly and was found to be immaculate. All drums were arranged, labeled, dated + in good shape. The Haz. waste storage has 2-way radios, beepers, + phones next door. Daily inspections are done and records are kept.

There are Chemical Storage Buildings across + next to the haz. waste storage area where raw materials

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS (continued):

are stored. In this area explosion proof phones are used.

Also on site is a wood shop & a maintenance machine shop. These shops use degreaser - stoddard solvent. The machine shop also uses small amts. of cutting oils (1 quart/mo) + some motor oil (10 g/yr.) shipped out as Haz. waste.

The Power house, is where the 4 boilers (uses #6 oil) are located, as well as 3 air compressors.

On site there are 5 - 2500 gal. #6 fuel oil underground tanks; 1 - 5000 gal. above ground tank of CO_2 raw material; 2 liquid nitrogen above ground tanks - 4000 gal + 2000 gal raw mat'l; 1 - 750 gal. above ground tank of diesel fuel; a 1 - 4000 gal. above ground Haz. waste storage tank of Cupric chloride.

Bendix itself has been in existance since 1939, + merged with Allied-Signal in 1982. ECRA became involved in 1985 when 6 underground tanks (4 - 250 gal. jet fuel + 2 - 25,000 gal #4 + #6 fuel) were tested + pulled. The ECRA case mgr is Chris Neuffer, who informed me of the activ information. However, this case is still open. There are a few monitoring wells on site also.

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS (continued):

The facility tour found all areas to be in compliance. As previously mentioned, the haz. waste storage area was immaculate. All drums were arranged 18" apart, labeled, & dated.

The required documents were generally in good order, with 3 exceptions (one later found to be adequate): 2 manifests, #NJA0456657 was missing the TSD & EPA ID number, and CTB0075809 which I originally thought had the wrong waste code/or the wrong waste discriptio For these, NOV's were issued. After several conversations with the CT.DEP. H.W.M., and a letter submitted to me by Allied-Signal, I learned that the proper waste code, and the proper haz. waste description was indeed correct. A rescission letter was sent to Mark Schwind, on , with my apology, for manifest # CTB0075809 only. The NOV for the other above mentioned manifest still stands.

The other problem I encountered was the fact that they had no written

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS (continued):

approval from the Dept. to use an above ground storage tank (4000 gal) for cupric chloride (D002). For this, an NOV was issued.

ALL land ban restricted waste forms were available + attached to manifests appropriately. Therefore, no referrals to USEPA is needed. Any waste sent offsite to facilities are either lab packs, or minute amounts (.001%) which, if any, are incinerated.

explain

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

1) Cleaning + degreasing machines - 111, T.C.A., TCE, Freon, 113 methylene Chloride, nitromethane
2) (a) Etching machine #II process - Cupric Chloride HCl,
(b) Etching machine #I - sodium persulfate
(c) Etching machine III - ammonium hydroxide
3) 1112A resist solids - from 1112A resist Liquids removed particles; glycol ethers.

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

4) 1112A resist Liquids - a cleaner stripper which removes particles; glycol ethers
5) Electroless Copper - a chemical plating solution composed of formaldehyde + sodium hydroxide
6) Pyro Copper - H_2O, phosphoric acid, sulfur (copper sulfate), lead, used in plating.
7) Chlorinates - HCl, etc.
8) Oils + Solvents - Acetone, M.E.K. Alcohol, Aromatic HOC, Ethylene cellosolve monoethyl Ether, Methyl isobutyl Ketone, cutting oil, machine oils
9) metal Hydroxide - generated from the waste water treatment facility
10) Nickel - used in plating
11) Chromic Acid - used in Etching
12) Lab Packs - corrosive mat'l., poison B, Iso. Alcohol, chemicals, etc

continued

Continued ↓

-B-I

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

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

9-20-89 2-55 gallon drums of hydrolic acid - lime clean (D002)

10-12-89 2-55 gallon drums of Ammonium nitrate solution (D001)

11-10-89 1-30 gallon cardboard drum of waste chromatic acid clean-up mat'l (D002)

9-28-89 1-55 gallon drum concrete floor clean-up

10/3, 12/5, 12/11, 12/9, 12/15, 12/20 → 10-55 gallon drums of ammonium hydroxide (D002)

11/15, 11/3, 11/17 → 3-55 gallon drums of waste alkaline liquid (D002)

11/13, 11/31 10-55 gallon drums 1,1,1 Trichloroethane (F001)

11/14, 12/4 2-55 gallon drums Freon (F001)

11/3 1-55 gallon drum of methylene chloride (F001)

12/4 1-55 gallon drum of hydrochloric acid soda ash clean-up (D002)

10/25, 10/27, 11/6, 11/13, 11/20, 11/21 → 10-55-gallon drums of waste oil, N.O.S. (X726)

10/25 1-55 gallon drum of waste thinners, N.O.S (F003)

11/17 2-55 gallon drums of waste alcohol, NOS (F003)

* The above are all located in the haz. waste storage area.

GENERAL CHECKLIST

GENERAL		YES	NO	N/A
7:26-7.4(a)1	Does the Generator have an EPA ID number?	✓		
HAZARDOUS WASTE DETERMINATION				
7:26-8.5(a)	Did the generator test its waste to determine whether it is hazardous?	✓		
7:26-8.5(b)	Did the generator determine the hazardous characteristics based upon knowledge of process?	✓		
	Is the waste hazardous?	✓		
7:26-8.5(d)	Were test results, waste analysis, or other determinations made in accordance with this section kept for three years from the date that the waste was last sent to an on-site or off-site TSF?	✓		
MANIFESTS				
7:26-7.4(a)4	Does each manifest have the following information? Please circle the elements missing and obtain a copy of the incomplete manifests. (List those manifests that are deficient on G-1).			
7:26-7.4(a)4i	The generator's name, address and phone number.	✓		
7:26-7.4(a)4ii	The generator's EPA ID number.	✓		
7:26-7.4(a)4iii	The hauler(s) name, address phone number and NJ registration.	✓		
7:26-7.4(a)4iv	The hauler(s) EPA ID number.	✓		
7:26-7.4(a)4v	The name, address and phone number of the designated TSD facility.	✓		
7:26-7.4(a)4vi	The TSF's EPA ID number. NJA048657		✓	
7:26-7.4(a)4v	The name, address and phone number of the designated TSD facility.	✓		
7:26-7.4(a)4vii	The name, type and quantity of hazardous waste being shipped, including such particulars as may be required regarding same?	✓		
7:26-7.4(a)4viii	Special handling instructions and any other information required on the form to be shipped by generator?	✓		

		YES	NO	N/A
7:26-7.4(3)	Did the generator describe all N.O.S. wastes in Section J?	✓		
7:26-7.4(a)ix	When shipping hazardous waste to a waste reuse facility does the generator enter the waste reuse facility I.D. # in the section G of the Uniform Manifest?			✓
7:26-7.4(a)5	Before allowing the manifested waste to leave the generator's property, did the generator:			
7:26-7.4(a)5i	Sign the manifest certification by hand?	✓		
7:26-7.4(a)5ii	Obtain the handwritten signature of the initial transporter and date of acceptance on the manifest?	✓		
7:26-7.4(a)5iii	Retain one copy and forward one copy to the state of origin and one copy to the state of destination?	✓		
7:26-7.4(a)5iv	Provide the required numbers of copies for: generator, each hauler, owner/operator of the designated facility, as well as one copy returned to the generator by the facility owner/operator?	✓		
7:26-7.4(a)5v	Give the remaining copies of the manifest form to the hauler?	✓		
7.26-7.4(f)	Has the generator maintained facility records for three (3) years? (Manifest(s), exception report(s) and waste analysis)	✓		
7:26-7.4(h)1	Has the generator received signed copies of portion B (from the TSD facility) of all manifests for waste shipped off site more than 35 days ago?	✓		
7:26-7.4(h)1	If not: Did the generator contact the hauler and/or the owner or operator of the TSDF and the NJDEP at (609) 292-8341 to inform the NJDEP of the situation?			✓
7:26-7.4(h)2	Have exception reports been submitted to the Department covering any of these shipments made more than 45 days ago?			✓

made copies of state copy + sent to the state

7:26-9.3 **Accumulation Time**

How is waste accumulated on site?

(✓) Containers - 559 drums
(__) Tanks (greater than 90 days)
(complete HWMF (TSD) Facility Checklist)
(__) Tanks (less than 90 days)
(✓) Above ground - Cupric chloride
(__) Below ground
(__) Surface impoundments
(complete HWMF (TSD) Facility Checklist)
(__) Piles (complete HWMF checklist)

		YES	NO	N/A
7:26-9.3(a)1	Is waste accumulated for more than 90 days?	__	✓	__

STOP HERE IF THE HAZARDOUS WASTE MANAGEMENT FACILITY (TSF) CHECKLIST IS FILLED OUT.

Short term accumulation standards for generators who accumulate waste in containers and tanks for 90 days or less:

Containers		YES	NO	N/A
7:26-9.4	What type of containers are used for storage. Describe size, type, quantity, and nature of waste (e.g. 12 fifty-five gallon drums of waste acetone). 44 - 55gal-drums			
7:26-9.4(d)2	Do the containers appear to be in good condition, not in danger of leaking?	✓		
	If no, describe the problem (include number of containers involved.)			
7:26-9.4(d)4i	Are all containers securely closed except those in use?	✓		
7:26-9.4(d)4iii	Do the containers appear to be properly handled or stored in a manner which will minimize the risk of the container rupturing and/or leaking?	✓		
7:26-9.4(d)4iv	Are containarized hazardous wastes segregated in storage by waste type?	✓		
7:26-9.4(d)4v	Is every container arranged so that its identification label is visible?	✓		
7:26-9.4(d)5	Is the container storage area inspected at least daily?	✓		
7:26-9.4(d)6	Are containers holding ignitable and reactive wastes located at least 50 (fifty) feet (15 meters) from the facilities property line?	✓		
7:26-7.2(a)	Did the owner/operator conspicuously label appropriate manifest number on all hazardous waste containers that are intended for shipment?	✓		
7:26-9.3(a)3	Is each container clearly dated with each period of accumulation so as to be visible for inspection?	✓		

		YES	NO	N/A
7:26-7.2(b)	Did the owner/operator insure that all containers used to transport hazardous waste off site are in conformance with applicable DOT regulations? (49CFR 171, 179)	✓		

Tanks (Less than 90 day storage)

7:26-9.3(b)	Does the generator accumulate hazardous waste on-site in an above ground tank?	✓		
	If yes, describe the tank(s): 1) Capacity 4000 gal 2) Shell thickness ← Didn't Know 3) Material Construction Fiberglass 4) Age of tank 8yrs.			
7:26-9.3(b)	Does the generator have written approval from the Department to store hazardous waste(s) in this tank(s) for ninety days or less?		✓ Stores Less than 90 days	
7:26-9.3(b)1	Does each tank(s) have sufficient shell thickness to ensure the tank will not collapse or rupture as specified by the Department?	✓		
7:26-9.3(b)4	Is the tank(s) designed so that at least 99% of the volume of each of the tanks can be emptied by direct pumping or drainage?	✓		
7:26-9.3(b)5	Is each tank(s) rendered empty (1% or less remaining) every 90 days or less?	✓		
7:26-9.3(b)6	Are all wastes removed from the tank(s) shipped off-site to an authorized facility or placed in an on-site, authorized facility?	✓		
7:26-9.3(b)8	If part of the tank is below grade, is it constructed to allow visual inspection of the tank, comparable to a totally above-ground tank and is is secondary containment provided for the below grade part?			✓
7:26-10.5(c)1	Are materials which are incompatible with the material of construction of the tank(s) placed in the tank(s)?		✓	
7:26-10.5(c)2	Does the generator use appropriate controls and practices to prevent overfilling?	✓		

		YES	NO	N/A
7:26-10.5(c)2ii	For uncovered tanks, is there sufficient (two feet or acceptable documentation) freeboard to prevent overtopping by wave or wind action by or precipitation?			✓
7:26-9.3(b)3	Does each tank(s) or storage tank area have secondary containment?	✓		
7:26-10.5(d)1	Is the containment system capable of collecting and holding spills, leaks, and precipitation?	✓		
7:26-10.5(d)1i	Is the base underlying the tank(s) free from cracks, gaps, and sufficiently impervious to contain leaks, spills, and accumulated rainfall until the collected material is detected and removed?	✓		
7.26-10.5(d)ii	Does the containment system consist of material compatible with the wastes being stored?	✓		
7:26010.5(d)iii	Is the containment system sloped or otherwise designed to efficiently drain and remove liquids resulting from leaks, spills and precipitation?			✓
7:26-10.5(d)iii	Is the tank protected from contact with accumulated liquids? covered	✓		
7:26-10.5(d)iv	Does the containment system have sufficient capacity to contain ten percent of the volume of all tanks or the volume of the largest tanks whichever is greater?	✓		
7:26-10.5(d)2	Is run-on into the containment area prevented?	✓		
	If not, explain.			
7:26-10.5(d)3	Is precipitation removed from the pump or collection area in a timely manner to prevent blockage or overflow of the collection system?			✓
7:26-10.5(d)4	Is spilled or leaked waste removed from the pump or collection area daily?			✓

		YES	NO	N/A
7:26-9.7(f)	Does the plan list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator and is this list kept up to date? Where more than one person is listed, one shall be named as primary emergency coordinator and others shall be listed in the order in which they will assume responsibility as alternates?	✓		
7:26-9.7(g)	Does the plan include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external) and decontamination equipment), where this equipment is required? Is the list up-to-date? In addition, does the plan include the location and physical description of each item on the list, and a brief outline of its capabilities?	✓		
7:26-9.7(h)	Does the plan include an evacuation procedure for facility personnel where there is a possibility that evacuation could be necessary? Does this plan describe signal(s) to be used to begin evacuation, evacuation routes, and alternative evacuation routes (in case where the primary routed could be blocked by releases of hazardous waste or fires)?	✓		
7:26-9.7(i)	Is a copy of the contingency plan and all revisions to the plan:			
	1. Maintained at the facility;	✓		
	2. Has the contingency plan been submitted to local authorities (police fire departments, emergency response teams)?	✓		
7:26-9.7(k)	Is there an employee on site or on call at all times with the responsibility of coordinating, all emergency response measures?	✓		

		YES	NO	N/A
7:26-10.5(d)4i	If the collected material is hazardous waste under NJAC 7:26-8, it is managed as a hazardous waste in accordance with all applicable requirements of this chapter?	✓		
7:26-9.4(g)4	<u>Personnel Training</u> Have facility personnel successfully completed a program of classroom instruction or on-the-job training since six months after the date of their employment or assignment to the facility or to a new position at the facility?	✓		
7:26-9.4(g)5	Has facility personnel taken part in an annual review of initial training?	✓		
7:26-9.4(g)2	Is the program directed by a person trained in hazardous waste management procedures and does it include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan to implementation) relevant to the positions in which they are employed?	✓		
	Is there written documentation of the following:			
7:26-9.4(g)6i	Job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job?	✓		
7:26-9.4(g)6ii	A written job description for each position related to hazardous waste management?	✓		
7:26-9.4(g)6iii	A written job description on the type and amount of both introductory and continuing training that has been and will be given to personnel in jobs related to hazardous waste management?	✓		
7:26-9.4(g)6iv	Documentation of actual training or experience received by personnel?	✓		
7:26-9.4(g)7	Are training records kept on all current employees until closure of the facility and training records kept on former employees for three years from their last date of employment?	✓		

		YES	NO	N/A
7:26-9.6	Preparedness and prevention			
	Does the facility comply with preparedness and prevention requirements including maintaining:			
7:26-96(b)1	An internal communications or alarm system?	✓		
7:26-9.6(b)2	A telephone or other device to summon emergency assistance from local authorities?	✓		
7:26-9.6(b)3	Portable fire equipment, spill control equipment, and decontamination equipment?	✓		
7:26-9.6(b)4	Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray system?	✓		
7:26-9.6(c)	Is equipment tested and maintained?	✓		
7:26-9.6(d)1	Is there immediate access to communications or alarm systems during systems during handling of hazardous waste?	✓		
7:26-9.6(e)	Adequate aisle space (18") to allow unobstructed movement of personnel fire protection equipment, spill control equipment and decontamination equipment?	✓		
	If no, please explain.			
	In your opinion, do the types of waste on site require all of the above procedures, or are some not required?	✓		
	Explain.			
7:26-9.6(f)	Has the facility made the following arrangements, as appropriate for the type waste handled on site:	✓		
7:26-9.6(f)1	Familiarize police, fire departments and emergency response teams with the layout of the facility and hazardous waste handled - associated hazardous places where facility personnel would normally be working, entrances and roads inside facility and possible evacuation routes.	✓		

		YES	NO	N/A
7:26-9.6(f)2	Where more than one police and fire department might respond to an emergency, is there an agreement designating primary emergency authority to a specific police or fire department, and agreements with any others to provide support to the primary emergency authority?	✓		
7:26-9.6(f)3	Agreements with emergency response contractors, and equipment supplies?	✓		
7:26-9.6(f)4	Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosion, or discharges at the facility?	✓		
7:26-9.6(f)5	Arrangement with local fire departments to inspect the facility on a regular basis with at least two (2) inspections annually?	✓		
7:26-9.6(f)6	If authorities identified in (f)1 through 5, above decline to enter into such arrangements, has the owner, or operator documented this refusal in the operating record.			✓
7:26-9.4(g)8	Are semi-annual drills conducted involving all employees and appropriate local authorities to test emergency response capabilities at the facility in accordance with the contingency plan and emergency procedures development pursuant to NJAC 7.26-9.7?	✓		
7:26-9.4(g)81	If no, did the owner or operator petition the Department for an exemption from the semi annual drills requirement?			✓
7:26-9.4(g)811	Did the owner or operator petition the Department for an exemption excluding some or all local officials in the semi annual drill requirements?			✓
	If yes, did the owner operator provide those specific local officials with written approval of the exemption?			✓

		YES	NO	N/A
7:26-9.7	Contingency Plan and Emergency Procedures			
7:26-9.7(a)	Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions, hazards to human health or environment, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents into air, soil or surface water?	✓		
7:26-9.7(b)	Are provisions of the plan carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment?	✓		
7:26-9.7(c)	Does the contingency plan describes the actions facility personnel shall take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility?	✓		
7:26-9.7(d)	Did the owner or operator prepare a Spill Prevention, Control, and Countermeasures (SPCC) Plan in accordance with 40 CFR 112 or 300 or a Discharge Prevention Containment and Countermeasure (DPCC) Plan in accordance with N.J.A.C. 7:1E-4.1 et seq.	✓		
	If yes, did the owner or operator amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this section?	✓		
7:26-9.7(e)	Does the plan describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services?	✓		

Allied Signal/Bend,

APPENDIX A

SOLVENT IDENTIFICATION CHECKLIST

1. Does the handler generate any of the following F001 constituents (i.e., spent halogenated solvents used in degreasing) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	___Yes	X No
trichloroethylene	X Yes	___No
methylene chloride	X Yes	___No
1,1,1-trichloroethane	X Yes	___No
carbon tetrachloride	___Yes	X No
chlorinated fluorocarbons	X Yes	___No

2. Does the handler generate any of the following F002 constituents (i.e., spent halogenated solvents) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	___Yes	X No
trichloroethylene	___Yes	X No
methylene chloride	___Yes	X No
1,1,1-trichloroethane	___Yes	X No
chlorobenzene	___Yes	X No
trichlorofluoromethane	___Yes	X No
1,1,2-trichloro-1,2,2-trifluoroethane	___Yes	X No
ortho-dichlorobenzene	___Yes	X No

3. Does the handler generate any of the following F003 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

xylene	X Yes	___No
acetone	X Yes	___No
ethyl acetate	___Yes	X No
ethyl benzene	___Yes	X No
ethyl ether	X Yes	___No
methyl isobutyl ketone	X Yes	___No
n-butyl alcohol	___Yes	X No
cyclohexanone	X Yes	X No
methanol	X Yes	___No

If the F003 waste stream has been mixed with a solid waste, does the resultant mixture exhibit the ignitability characteristic? ___Yes X No

4. Does the handler generate any of the following F004 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

cresols and cresylic acid	___Yes	X No
nitrobenzene	___Yes	X No

5. Does the handler generate any of the following F005 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

toluene	X Yes	___No
methyl ethyl ketone	X Yes	___No
carbon disulfide	___Yes	X No
isobutanol	X Yes	___No
pyridine	___Yes	X No

6. Are any of the constituents listed in questions 1 through 5 used for their "solvent" properties -- that is to solubilize (dissolve) or mobilize other constituents? The following questions will be helpful in confirming this determination.

(a) Are the constituents used as chemical carriers?
___Yes X No

If yes, list the constituents.

_____

_____

(b) Are the constituents used for degreasing/cleaning?
X Yes ___No

If yes, list the constituents.

111 TCA TCE FREON 113 METHYLENE CHLORIDE

(c) Are the constituents used as diluents?
___Yes X No

If yes, list the constituents.

_____

_____

(d) Are the constituents used as extractants?
___Yes X No

If yes, list the constituents.

_____

_____

(e) Are the constituents used for fabric scouring?
___Yes ✓ No

If yes, list the constituents.

_____

_____

(f) Are the constituents used as reaction and synthesis media?
___Yes ✓ No

If yes, list the constituents.

_____

_____

If the responses to questions 1 through 6 led the inspector to believe that the waste may be an F-solvent, answer question 7.

7. Are any of the above constituents spent solvents? (A solvent is considered "spent" when it has been used and is no longer usable without being regenerated, reclaimed, or otherwise reprocessed.) ✓ Yes ___No

8. If the waste is a mixture of constituents as determined in questions 1 through 6, give the concentration before use of <u>all</u> the constituents in the solvent mixture/blend. For example:

5%	methylene chloride
2%	trichloroethylene
25%	1,1,1-trichloroethane
68%	mineral spirits
100%	

If the waste stream is a mixture containing a total of 10% or more (by volume) of one or more of the F001, F002, F004, or F005 listed constituents before use, it is a listed waste.

With respect to the F003 solvent wastes, if, before use, the waste stream is mixed and contains <u>only</u> F003 constituents, it is a listed waste. For example:

33%	acetone
16%	methanol
51%	ethyl ether
100%	

If the waste stream is a mixture containing F003 constituents and a total of 10% or more of one or more of the F001, F002, F004, and F005 listed constituents before use, it is a listed waste. For example:

50%	xylene (F003)
12%	TCE (F001)
38%	mineral spirits
100%	

If in light of the above, the handler appears to be generating F001 - F005 hazardous wastes, refer this facility to the enforcement official for followup actions verifying the use of solvents at the facility.

APPENDIX B
TREATMENT STANDARDS FOR F-SOLVENTS

F001-F005 SPENT SOLVENTS	CONCENTRATION (IN MG/L) WASTEWATERS	OTHER WASTES
Acetone	0.05	0.59
N-butyl	5.0	5.0
Carbon disulfide	1.05	4.81
Carbon tetrachloride	.05	.96
Chlorobenzene	.15	.05
Cresols (and cresylic acid)	2.82	.75
Cycohexanone	.125	.75
1,2-dichlorobenzene	.65	.125
Ethyl acetate	.05	.75
Ethyl benzene	.05	.053
Ethyl ether	.05	.75
Isobutanol	5.0	5.0
Methanol	.25	.75
Methylene chloride	.20	.96
Methylene chloride (from the pharmaceutical industry)	12.7	.96
Methyl ethyl ketone	0.05	0.75
Methyl isobutyl ketone	0.05	.33
Nitrobenzene	0.66	0.125
Pyridine	1.12	0.33
Tetrachloroethylene	0.079	0.05
Toluene	1.12	0.33
1,1,1-Trichloroethane	1.05	0.41
1,2,2-Trichlor 1,2,2-trifluoroethane	1.05	0.96
Trichloroethylene	0.062	0.091
Trichlorofluoromethane	0.05	0.96
Xylene	0.05	0.15

Inspector: Jodie Stein
Address: 2 Babcock Pl
W. ORANGE, NJ
Telephone No: 669-3960

RCRA LAND DISPOSAL RESTRICTION
GENERATOR CHECKLIST

I. HANDLER IDENTIFICATION

A. Handler Name: Allied Signal / Bendix
B. Street (or other identifier): Rt 46
C. City: Teterboro
D. State: NJ
E. Zip Code: 07608
F. County Name: Bergen
G. Nature of Business; Identification of Operations; SIC Code(s): Aerospace
H. EPA ID #: NJD078714443
I. Handler Contact (Name and Phone Number): MARK Schwind / MATT WATSON

II. GENERATOR COMPLIANCE

Comments

A. Waste Identification

1. F-Solvents

a. Does the handler generate the following wastes?

(i) F001, F002, F004, or F005 ✓ Yes ___ No

(ii) F003 ✓ Yes ___ No

If an F003 wastestream (listed solely for ignitability) has been mixed with a non-restricted solid or hazardous waste, does the resultant mixture exhibit the ignitability characteristic? ___ Yes ___ No — N/A

b. Source of the above: Form 8700-12 ___; Part A ___; Part B ___; Biennial/Annual Reports ___ other (specify) ✓ MANIFESTS.

Appendix A is intended to assist the inspector and enforcement official in determining whether the facility is generating F-solvent wastes, if such wastes were not identified by the facility previously. If you are concerned that F-solvent wastes may be misclassified or mislabeled, turn to Appendix A-1. To assist in identifying potentially

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

misclassified F-solvents, Appendix A-2 presents a list of corresponding F and U wastes. Note concerns below: _____

2. Dioxin wastes

a. Does the handler report the generation of the following wastes? (The following industries may generate listed dioxin wastes: organic chemicals, pesticide or formulator.)

(i) F020 - F023, F026 - F027 ___Yes ✓No
(ii) F028 ___Yes ✓No

[F-solvent BDAT standards are presented as Appendix B]

3. California Waste Identification

a. Does the facility handle any of the following wastes?

(i) D002 ✓Yes ___No
(ii) D004 - D011 ✓Yes ___No

b. Does the generator handle any hazardous wastes characterized by high concentrations of halogenated organic constituents (HOCs), metals, or cyanides? ✓Yes ___No

[California waste standards are presented as Appendix C]

c. Is the generator handling any of the F, K, P, or U wastes subject to the "soft hammer" that may qualify as California wastes due to HOC, metals, or cyanide content? See Appendix D for a listing of California constituents likely to be found by waste code. ✓Yes ___No

d. Has the generator conducted the paint filter test (Method 9095) [§268.32(i)]? ✓Yes ___No*

e. Has the generator conducted any testing of these hazardous wastes to determine whether the concentrations qualify the hazardous wastes as California wastes? ✓Yes ___No

If no, has the generator retained records documenting his "applied knowledge" that the hazardous waste is not a California waste? ___Yes ___No

* A potential violation is indicated

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

If "no" is answered to both parts of this question, a violation is indicated. [§268.7(a)]

Describe the nature of the records:

_____

f. Source of the above: Form 8700-12 ___; Part A ___; Part B ___; Biennial/Annual Report ___; other (specify) ✓ WASTE ANALYSIS SHEETS

4. First Third Waste Identification

a. Does the generator handle any of the wastes listed as First Third Wastes in §268.10? See Appendix E for listing. List First Third Wastes handled by the generator here:
F006

b. Does the generator handle any soft-hammer wastes (Appendices D-1, D-2, and F)? If so, list those wastes: → Treat W.W. ON Site
P015, P030, U188, P105, etc
See Attached Copy

c. Are any of the soft-hammered wastes California wastes (see Appendix G)? ✓ Yes ___ No

If yes, the wastes must meet BDAT standards prior to disposal.

d. Has the Regional Administrator received demonstrations/certifications for all soft hammered wastes to be land disposed [§268.8(a)(2)]? ___ Yes ___ No* N/A - ALL Wastes are incinerated except for occasion. Lab Packs which are treated

e. Source of the above: Form 8700-12 ___; Part A ___; Part B ___; Biennial/Annual Report ___; other (specify) ✓ Certification letter

B. **BDAT Treatability Group - Treatment Standards Identification**

1. Does the generator mix restricted wastes with different treatment standards for constituents of concern? ___ Yes ✓ No

2. If yes, did the generator select the most stringent treatment standard for the constituent of concern [§268.41(b)]? ___ Yes ___ No*

* A potential violation is indicated

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

3. F Solvents

   a. Did the generator correctly determine the appropriate treatability group [§268.41] of the waste (e.g., wastewaters containing solvents, nonwastewater (i.e., < 1% TOC), pharmaceutical wastewaters containing spent methylene chloride, all other spent solvent wastes)?
   ✓ Yes ___ No*

4. California Wastes

   a. Did the generator correctly determine the distinction between liquid hazardous wastes and non-liquid hazardous wastes that contain HOCs in concentrations greater than 1,000 mg/kg [§268.32(h)]?
   ___ Yes ___ No* N/A

5. First Third Wastes

   a. Did the generator ascertain whether restricted wastes were appropriately assigned wastewater or nonwastewater designations (nonwastewaters are > 1% TOC and > 1% suspended solids) [§268.7(a)]?
   ✓ Yes ___ No*

   b. Does the facility handle K061 wastes?
   ___ Yes ✓ No

   If yes, were nonwastewaters appropriately classified in either the high or low zinc subcategories (≥15% Zn) [§268.7(a)] [§268.41(a)]?
   ___ Yes ___ No*

   c. Does the facility handle K101 or K102 wastes?
   ___ Yes ✓ No

   If yes, were nonwastewaters appropriately classified in either the high or low arsenic subcategories [§268.7(a)] [§268.41(a)]?
   ___ Yes ___ No*

   d. Is there any reason to believe that the generator may have diluted the waste to change the applicable treatment standard (based on review of process operation, pipe routing, point of sampling)?
   ___ Yes ✓ No

*/ A potential violation is indicated

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

C. Waste Analysis

1. Did the generator determine whether the waste exceeds treatment standards based on §268.7(a):

They do testing but not disposal

a. Knowledge of wastes ___Yes ___No

(i) List wastes for which "applied knowledge" was used:

_____

_____

b. TCLP ___Yes ___No

N/A

(i) List wastes for which "TCLP" was used:

_____

_____

(ii) Appendix D lists wastes for which treatment standards are expressed as concentrations in waste extract. Were any wastes handled by the generator subject to waste extract standards not tested using the TCLP? ___Yes ___No

If yes, list: _____

_____

c. Total waste analysis ___Yes ___No

d. If files were retained, describe content and basis of applied knowledge determination:

_____

_____

_____

If determined by TCLP or total constituent analysis, provide date of last test, frequency of testing, and attach test results.

Dates/frequency: _____

Note which wastes were subjected to which tests:

_____

_____

_____

Note any problems (e.g., inadequate analysis, variation of waste composition/generation for applied knowledge) _____

✓ A potential violation is indicated

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

e. Were wastes tested using TCLP or total constituent analysis when a process or vastestream changed [§264.13(a)(3)(i) or §265.13(a)(3)(i)]? N/A
___Yes ___No*

2. Did the restricted wastes exceed applicable treatability group treatment standards upon generation [§268.7(a)(1)]? NO

List those that exceeded standards: _____

List those that did not exceed standards: _____

3. Did the generator dilute the waste or the treatment residual so as to substitute for adequate treatment [§268.3] ___Yes* ___No

D. Management

1. Onsite management

a. Were restricted wastes managed onsite? ___Yes ✓No

If no, go to "2".

b. For wastes that exceed treatment standards, was treatment in regulated units, storage for greater than 90 days, and/or disposal conducted? ___Yes ___No

If yes, TSDF checklist must be completed.

2. Offsite Management

a. If restricted wastes exceed treatment standards, did generator provide treatment facility notification with each shipment? [268.7(a)(1)]:

(i) EPA Hazardous Waste Number? ✓Yes ___No*

(ii) Corresponding treatment standard? ✓Yes ___No*

(iii) Manifest number? ✓Yes ___No*

(iv) Waste analysis, if available? ✓Yes ___No

* A potential violation is indicated

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

Identify offsite treatment facilities C.W.M, Newark, Enviroite, Conn, AETC, NJ

b. If restricted wastes do not exceed treatment standards, did generator provide the disposal facility with a notice and certification including:

(i) EPA hazardous waste I.D. number? ___Yes ___No*

(ii) Corresponding treatment standard? ___Yes ___No*

(iii) Manifest number ___Yes ___No*

(iii) Certification regarding waste and that it meets treatment standards? ___Yes ___No*

N/A

NOTHING LAND disposed.

Identify land disposal facilities receiving the BDAT certified wastes _____

c. If the generator's waste is subject to a §268.5 case by case exemption, a §268.6 "no migration" exemption, or a nationwide variance (see Appendix E for restricted wastes subject to nationwide variances), does the generator's records indicate that he or she submits with each waste shipment [§268.7(a)(3)]:

(i) EPA Hazardous Waste Number? ___Yes ___No*

(ii) Corresponding Treatment Standards? ___Yes ___No*

(iii) All applicable prohibitions? ___Yes ___No*

(iv) The manifest number? ___Yes ___No*

(v) The date the wastes are subject to prohibitions? ___Yes ___No*

(vi) Does generator keep records of all notifications/certifications send to offsite facilities? ___Yes ___No*

* A potential violation is indicated

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

List all prohibited wastes for which records are not provided per above [§268.7(a)(b)]: N/A

_____

_____

Identify TSDFs receiving any prohibited wastes subject to any exemptions and variances:

_____

_____

d. If handler generates a "soft hammer" waste, does the generator send with each "soft hammer" waste shipment to a TSDF and retain copies of, a notice that includes [268.7(a)(4)]:

The EPA Hazardous Waste Number? ✓ Yes ___ No*

Applicable prohibitions? ✓ Yes ___ No*

The manifest number? ✓ Yes ___ No*

Waste analysis data, where available? ✓ Yes ___ No

(i) Do the generator's records indicate that any soft-hammer wastes are destined for disposed in a landfill or surface impoundment [§268.33(f)]? ___ Yes ✓ No

If yes, list facility of destination and waste of concern [§268.8(a)(2)]

_____

_____

(ii) Has the generator submitted demonstrations and certifications for each "soft-hammered" waste destined to be disposed in landfill or surface impoundment to the Regional Administrator prior to the shipment of waste to the TSDF [§268.7(a)(2)]? ___ Yes ___ No* N/A nothing LANDfilled

(iii) Has the generator retained a copy of the demonstration on site [§268.8(a)(3)-(a)(4)]? ✓ Yes ___ No* They have a copy but not for wastes destined for landfill,

(iv) Has the generator retained copies of all §268.8 certifications sent to the TSDF [§268.7(a)(6)] ✓ Yes ___ No*

* A potential violation is indicatnd

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

N/A

(v) Did the generator submit the demonstration to the receiving facility upon the intial shipment of the waste [§268.8(a)(3)-(a)(4)]? ___Yes ___No*

(vi) If the Regional Administrator has invalidated the certification, has the generator ceased shipment of the waste and do records indicate that the generator has informed all receiving facilities of the invalidation [§268.8(b)(3)]?
___Yes ___No*

E. Storage of Prohibited Waste

1. Were prohibited wastes stored for greater than 90 days? ___Yes ___No

If yes, was facility operating as a TSD under interim status or final permit [§262.34(b)]?
___Yes ___No*

If yes, TSDF Checklist must be completed.

F. Treatment Using RCRA 264/265 Exempt Units or Processes (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, etc.)

1. Were treatment residuals generated from RCRA 264/265 exempt units or processes? ___Yes ___No

If yes, list type of treatment unit and processes

_____
_____
_____

If yes, TSDF checklist must be completed.

*/ A potential violation is indicated

L. B. checklist

4 b

Administrator, USEPA
Region II
Room 900
26 Federal Plaza
New York, N.Y. 10278

March 28, 1989

Dear Sir/Madam,

This letter serves as demonstration and certification required in 40 CFR 268.8(a)1.

Allied-Signal Aerospace Company, Teterboro Facility, ocassionally disposes of small quantities of nonreoccuring chemical wastes from the material and quality assurance laboratories. These chemicals are generally used in metalurgic analysis and have become obsolete due to being out of spec, exceeding shelf life, process change, etc..

Per regulation, wastes of this type are considered to be soft-hammer wastes. The following list of wastes were shipped for incineration to either:

ThermalKEM, Inc.
Route 5
Rock Hill, S.C. 29730

BDT, Inc.
4255 Research Parkway
Clarence, N.Y. 14031

The soft-hammer wastes generated at the Teterboro Facility are as follows:

P010 - ARSENIC ACID

P012 - ARSENIC (III) OXIDE

P030 - CYANIDES (Soluble Cyanide Salts) NOT ELSEWHERE SPECIFIED

P048 - 2,4-DINITROPHENOL

P105 - SODIUM AZIDE

U012 - ANILINE

U019 - BENZENE

U031 - 1-BUTANOL

U037 - CHLOROBENZENE

U044 - TRICHLOROMETHANE

U077 - ETHYLENE DICHLORIDE

U108 - 1,4-DIOXANE

U115 - ETHYLENE OXIDE

U159 - METHYL ETHYL KETONE

U188 - PHENOL

U209 - 1,1,2,2-TETRACHLOROETHANE

U210 - TETRACHLOROETHYLENE

U211 - CARBON TETRACHLORIDE

U219 - THIOUREA

U220 - TOLUENE

U221 - DIAMINOTOLUENE

U226 - 1,1,1-TRICHLOROETHANE

U228 - TRICHLOROETHYLENE

In search for the acceptable treatment facility for these materials, the following facilities have been contacted with the assistance of our environmental service company:

CyanoKEM, Inc.
12381 Shaefer Highway
Detroit, MI 48227

Chemical Waste Management of NJ
100 Lister Ave.
Newark, NJ 17105

I certify under penalty of law that the requirements of 40 CFR 286.8(a)1 have been met and that I have contracted to treat my waste (or will otherwise provide treatment) by the practically available technology which yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Sincerely,

Matthew D. Watson
Environmental Engineer

cc: W. Hooper
T. Russell
J. Bell, AETC
File

Form HWM-004
2/87

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
~~9th Fl., 401 E. State St., Trenton, N.J. 08625~~
2 Babcock Pl. W. Orange, NJ 07052

NOTICE OF VIOLATION

ID NO. NJD078714433 DATE 12-15-89

NAME OF FACILITY Allied Signal/Bendix Aerospace Co.

LOCATION OF FACILITY RT 46 Teterboro, NJ 07608

NAME OF OPERATOR Matt Watson

You are hereby NOTIFIED that during my inspection of your facility on the above date, the following violation(s) of the Solid Waste Management Act, (N.J.S.A. 13:1E-1 et seq.) and Regulations (N.J.A.C. 7:26-1 et seq.) promulgated thereunder and/or the Spill Compensation and Control Act, (N.J.S.A. 58:10-23.11 et seq.) and Regulations (N.J.A.C. 7:1E-1 et seq.) promulgated thereunder were observed. These violation(s) have been recorded as part of the permanent enforcement history of your facility.

DESCRIPTION OF VIOLATION ~~NJAC 7:26-7.4(a)4vii: Failure to use proper EPA ID HAZ waste code number on manifest~~ * NJAC 7:26-7.4(a)4vi: No TSD EPA ID number ** NJAC 7:26-9.3(b): Failure to obtain written approval from the Dept. to store HAZ. waste in an above ground tank for 90 days or less.

Remedial action to correct these violations must be initiated immediately and be completed by JAN. 14, 1990. Within ~~fifteen (15)~~ 30 days of receipt of this Notice of Violation, you shall submit in writing, to the Investigator issuing this notice at the above address, the corrective measures you have taken to attain compliance. The issuance of this document serves as notice to you that a violation has occurred and does not preclude the State of New Jersey, or any of its agencies from initiating further administrative or legal action, or from assessing penalties, with respect to this or other violations. Violations of these regulations are punishable by penalties of $25,000 per violation.

NJ DEP Haz. Waste Advisement
(609) 292-8341
EPA-RCRA Hot Line
1-800-424-9346

Joan M. Stein
Investigator, Division of Waste Management
Department of Environmental Protection

* ~~CT 8 0075889~~ rescinded
** NJA 048657

State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
Metro Regional Office
2 Babcock Place, West Orange, N.J. 07052
(201) 669-3960

John J. Trela, Ph.D., Director

January 23, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
P 088 604 640

Mr. Mark Schwind
Allied - Signal Aerospace Company
Guidance Systems Division
Teterboro, N.J. 07608

Dear Mr. Schwind:

Subject: Rescind N.O.V. NJAC 7:26 - 7.4 (A) 4Viii

Dear Mr. Schwind:

I am sending you this letter to rescind the violation NJAC 7:26 - 7.4 (a) 4iii-, use of improper waste code on manifest CTB0075809, August 12, 1987. Based upon review of Allied - Signal case, and submittal of the information provided by Allied - Signal, it is clear that this violation should be rescinded.

Please accept my apology for any inconvenience this may have caused you.

If you have any further questions, please do not hesitate to contact me at (201) 669-3980.

Sincerely,

Jodie M. Stein

Jodie M. Stein
MFO - Hazardous Waste Management

JMS:pg

New Jersey is an Equal Opportunity Employer
Recycled Paper

Proof of Compliance follows:

9.3(b) - OK
7.4(a)4vi - OK
7.4(a)4vii - Rescinded

Form ADM-012

MEMO

NEW JERSEY STATE DEPARTMENT OF ENVIRONMENTAL PROTECTION

TO Yacoub E. Yacoub DATE 1-30-90

FROM Jodie H. Stein thru. Jeff Sterling (JS)

SUBJECT Allied-Signal Aerospace inc.

On 1-19-90, I received the follow-up information from Mark Schwind concerning the following violations:

NJAC 7:26-7.4(a)4vi: No TSD EPA Id number

NJAC 7:26-9.3(b): Failure to obtain written approval from the Dept. to store Haz. waste in an above ground tank for 90 days or less.

NJAC 7:26-7.4(a)4iii: Failure to use proper EPA Id haz. waste Code number*

All areas were adequately addressed and compliance was achieved. *For the NJAC 7.26-7.4(a)4iii; violation was issued, but upon review of submitted material, the violation was rescinded and a recission letter was sent.

RCRA PRIORITIZATION SYSTEM SCORING SUMMARY

FOR Rona Pearl Division EM Ind.

EPA SITE NUMBER: NJD 080619067

Bayonne, N.J.

SCORED BY: N.R. Thakuria

OF CDM Federal

ON 8/10/93

GROUNDWATER SCORE :

SURFACE WATER SCORE:

AIR ROUTE SCORE :

ONSITE SCORE :

MIGRATION SCORE :

Ref Final Draft
Environmental Priorities Initiative
Preliminary Assessment Report.
Submitted to EPA on March 27, 1992

EPA ID NO. : NJD080619067

WS-1 GROUNDWATER ROUTE

IS THERE AN OBSERVED RELEASE? No Ref Part IV, Item 1

ROUTE CHARACTERISTICS

DEPTH TO AQUIFER (FT.) : < 20' Ref Part IV, Item 2

NET PRECIPITATION (IN.) : 12" Ref NCAPS Manual Fig D-1 (Annual Precipitation); Fig D-2 (Annual lake evaporation)

PHYSICAL STATE: Liquid
Ref Part II, WU 1, 2 & 3, Hazardous substances/physical state

CONTAINMENT: Fair Ref Part II, WU #2 Description
Leaky containers/ Unlined secondary containment. Evidence of historical spills in concrete drum storage pad; NO berming exists.

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: Toluene Ref Part II WU 2; Haz. Substances/physical state.

TOXICITY/PERSISTANCE VALUE: 9

QUANTITY KNOWN? No

CUBIC YARDS OR TONS: Ref Part II, WU 2, 3, Item H Hazardous waste Quantity
DRUMS :
50 drums were observed during the 1992 inspection.
WU 2 did not indicate the actual capacity other than the drums observed during inspection.

Likely to be large (710 Cu. Yards)
Additionally, Waste unit 3 total known tank capacity is in excess of 65,000 gallons.

TARGETS

GROUNDWATER USE: Industrial/Commercial Ref Part IV Item 9

DISTANCE TO WELL (MILES): Ref Part IV Item 6

Residents do not obtain drinking water from within 4 miles of the Site. As per NCAPS guidance, assume greater than 4 miles.

EPA ID NO. : NJD080619067

WS-2 SURFACE WATER ROUTE

RELEASES

IS THERE AN OBSERVED RELEASE? Yes - Ref Part IV, Item 10

IS THERE A PERMITTED OUTFALL? Yes Ref Part I, Item 11

HAVE THERE BEEN PERMIT VIOLATIONS? No Ref Report did not indicate any violation of permit.

ROUTE CHARACTERISTICS

FACILITY LOCATION: other Ref Part IV, Item 13 (outside 500 yr flood zone)

24-HOUR RAINFALL: 2.75" Ref NCAPS Manual, Fig D-3 Rainfall

DISTANCE TO SURFACE WATER (MILES): 550' (0.1 mile) Ref Part IV, Item 12

PHYSICAL STATE: Liquid
Ref Part II, WU 1, 2 & 3, Hazardous substance/physical state

CONTAINMENT: Fair Leaky containers/ unsound secondary containment. Ref Part II WU 3, Description Historical decomposition of tank from tank B and on observed release to Plotty Kill Creek.

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: Nitric Acid Ref Part II WU 3 Hazardous substance/physical state

TOXICITY/PERSISTANCE VALUE: 9

QUANTITY KNOWN? No

CUBIC YARDS OR TONS: Ref Part II, WU 3, Hazardous Waste Quantity Section
DRUMS :

Likely to be Large
Total of known tank capacities is 65,000 gallons. The capacity of the tank pits is not known.

TARGETS

SURFACE WATER USE: Assume Recreation Ref Part IV, Item 14
No surface water intakes within 15 miles downstream.

DISTANCE TO INTAKE OR CONTACT POINT (MILES): 550' (.1 mile) (contact point) Ref Part IV Item 12

DISTANCE TO SENSITIVE ENVIRONMENT (MILES): 5.6 (wetland) Ref Part IV, Item 16 Ref #. 31

EPA ID NO. : NJD080619067

WS-3 AIR ROUTE

Note: The facility has 23 air permits currently in force, however the report does not provide any information on their associated emissions or processes. Therefore, they will not be considered as a potential contaminant source.

RELEASES

IS THERE AN OBSERVED, UNPERMITTED, ON-GOING RELEASE? No Ref Part IV, Item 21

DOES THE FACILITY HAVE AN AIR OPERATING PERMIT(S)? Yes Ref Part I, Item 11

HAVE THERE BEEN ANY PERMIT VIOLATIONS OR ODOR COMPLAINTS BY RESIDENTS? No Ref Part IV, Item 21

CAN CONTAMINANTS MIGRATE INTO AIR? No. The drum storage area appeared sound as observed during a 1992 site reconnaissance. Ref Part II, WU 2, Description Section

CONTAINMENT: good Ref Part II, WU 2. Description
Sealed container/store open area. Drums were outside in an open area

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: Toluene Ref Part II WU 2, Hazardous substance physical state

TOXICITY/PERSISTANCE VALUE: 3
(Toxicity Table for Toluene)

QUANTITY KNOWN?
N

CUBIC YARDS OR TONS:
DRUMS: Ref. Part II, WU 2
Likely to be large (>10 cu yards)
WU 2 did not indicate actual storage facility other than the drums observed during inspection. 50 drums were observed during a 1992 inspection.

TARGETS

POPULATION: There is population within 4 miles Ref Part IV, Item 22

DISTANCE TO SENSITIVE ENVIRONMENT (MILES): 5.6 Part IV, Item 16, & 23

EPA ID NO. : NJ 0080619067

WS-4 ON SITE CONTAMINATION

ACCESS TO SITE: Limited access (Assume barrier/partially open) Ref Fig 2, facility had fence but did not indicate the integrity of the fence.

IS THERE AN OBSERVED SURFACE SOIL CONTAMINATION? No. Ref Report did not indicate any surface soil contamination.

CONTAINMENT: Fair (leaky container/ Unsafe secondary containment) Ref Part II, WU 2, Description, Evidence of historical spills on concrete drum storage pad; no berming exists to prevent spills from migrating to exposed soil.

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: Toluene Ref Part II, WU 2, Haz. Substance/Physical State

TOXICITY/PERSISTANCE VALUE: 3 (Toxicity Table for Toluene)

TARGETS

DISTANCE TO RESIDENTIAL AREAS (MILES): ½ Ref Part IV, Item 22

IS THERE AN ON-SITE SENSITIVE ENVIRONMENT: No. Ref Part IV Item 20, 23

RCRA PRIORITIZATION SYSTEM SCORING SUMMARY

FOR

RONA PEARL DIVISION EM IND.

EPA SITE NUMBER: NJD080619067

BAYONNE, NJ

SCORED BY: ROB SAVILL

OF CDM FEDERAL

ORIGINAL RANKING: 09/27/93 LAST RANKING: 09/27/93

GROUNDWATER SCORE	:	8.78
SURFACE WATER SCORE	:	34.04
AIR ROUTE SCORE	:	10.96
ONSITE SCORE	:	3.43
MIGRATION SCORE	:	18.49

Low
3/9/94 - in RCRIS

EPA ID NO. : NJD080619067
RONA PEARL DIVISION EM IND.

WS-1 GROUNDWATER ROUTE

IS THERE AN OBSERVED RELEASE? P

ROUTE CHARACTERISTICS

DEPTH TO AQUIFER (FT.) : 19

NET PRECIPITATION (IN.) : 12

PHYSICAL STATE: LIQUID, GAS, SLUDGE

CONTAINMENT: FAIR

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: TOLUENE

TOXICITY/PERSISTANCE VALUE: 9

QUANTITY KNOWN? NO

CUBIC YARDS OR TONS: 0
DRUMS : 0

AMOUNT IS LIKELY TO BE LARGE

TARGETS

GROUNDWATER USE: AGRICULTURE OR INDUSTRIAL

DISTANCE TO WELL (MILES): 4.0

EPA ID NO. : NJD080619067
RONA PEARL DIVISION EM IND.

WS-2 SURFACE WATER ROUTE

RELEASES

IS THERE AN OBSERVED RELEASE? Y

IS THERE A PERMITTED OUTFALL?

HAVE THERE BEEN PERMIT VIOLATIONS?

ROUTE CHARACTERISTICS

FACILITY LOCATION: NA

24-HOUR RAINFALL: NA

DISTANCE TO SURFACE WATER (MILES): NA

PHYSICAL STATE: NA

CONTAINMENT: NA

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: NITRIC ACID

TOXICITY/PERSISTANCE VALUE: 9

QUANTITY KNOWN? NO

CUBIC YARDS OR TONS: 0
DRUMS : 0

AMOUNT IS LIKELY TO BE LARGE

TARGETS

SURFACE WATER USE: POSSIBLE DRINKING WATER OR RECREATION

DISTANCE TO INTAKE OR CONTACT POINT (MILES): 0.1

DISTANCE TO SENSITIVE ENVIRONMENT (MILES): 5.6

EPA ID NO. : NJD080619067
RONA PEARL DIVISION EM IND.

WS-3 AIR ROUTE

RELEASES

IS THERE AN OBSERVED, UNPERMITTED, ON-GOING RELEASE? N

DOES THE FACILITY HAVE AN AIR OPERATING PERMIT(S)? Y

HAVE THERE BEEN ANY PERMIT VIOLATIONS OR ODOR COMPLAINTS BY RESIDENTS? N

CAN CONTAMINANTS MIGRATE INTO AIR? Y

CONTAINMENT: GOOD

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: TOLUENE

TOXICITY/PERSISTANCE VALUE: 3

QUANTITY KNOWN? NO

CUBIC TARDS OR TONS: 0
DRUMS : 0

AMOUNT IS LIKELY TO BE LARGE

TARGETS

POPULATION: RESIDENCES ARE LOCATED WITHIN FOUR MILES

DISTANCE TO SENSITIVE ENVIRONMENT (MILES): 5.6

EPA ID NO. : NJD080619067
RONA PEARL DIVISION EM IND.

WS-4 ON SITE CONTAMINATION

ACCESS TO SITE: LIMITED ACCESS

IS THERE AN OBSERVED SURFACE SOIL CONTAMINATION? N

CONTAINMENT: FAIR

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: TOLUENE

TOXICITY/PERSISTANCE VALUE: 3

TARGETS

DISTANCE TO RESIDENTIAL AREAS (MILES): 0.50

IS THERE AN ON-SITE SENSITIVE ENVIRONMENT: N

RCRA PRIORITIZATION SYSTEM SCORING SUMMARY

FOR Rona Pearl Division EM Ind.

EPA SITE NUMBER: NJD 080619067

Bayonne, N.J.

SCORED BY: N.R. Thakuria

OF CDM Federal

ON 8/10/93

GROUNDWATER SCORE :

SURFACE WATER SCORE:

AIR ROUTE SCORE :

ONSITE SCORE :

MIGRATION SCORE :

Ref. Final Draft
Environmental Priorities Initiative
Preliminary Assessment Report.
Submitted to EPA on March 27, 1992

EPA ID NO. : NJD 080619067

WS-1 GROUNDWATER ROUTE

IS THERE AN OBSERVED RELEASE? No Ref Part IV, Item 1
Score Possible

ROUTE CHARACTERISTICS

DEPTH TO AQUIFER (FT.) : <20' Ref Part IV, Item 2

NET PRECIPITATION (IN.) : 12' Ref NCAPS Manual
Fig D-1 Annual Precipitation
Fig D-2 Annual lake evaporation

PHYSICAL STATE: Liquid
Ref Part II, WU 1, 2 & 3, Hazardous substance/physical state

CONTAINMENT: Fair
Leaky containers, Unknown Secondary containment. Ref Part II, WU #2 Description
Evidence of historical spills on concrete drum storage pad; no berming exists.

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: Toluene

TOXICITY/PERSISTANCE VALUE: 9

Ref Part II WU 2, Haz. Substance/physical state.

QUANTITY KNOWN? No

CUBIC YARDS OR TONS:
DRUMS :

Ref Part II, WU 2,3, Item H Hazardous waste Quantity
50 drums were observed during a 1982 inspection.
WU 2 did not indicate the actual capacity other than the drums observed during inspection.

Likely to be large
(710 cu. yards)

Additionally, Waste Unit 3 total known tank capacity is in excess of 65,000 gallons.

TARGETS

GROUNDWATER USE: Industrial/Commercial Ref Part IV Item 9

DISTANCE TO WELL (MILES): Ref Part IV Item 6

Residents do not obtain drinking water from within 4 miles of the Site. As per NCAPS guidance, assume greater than 4 miles.

EPA ID NO. : NJD080619067

WS-2 SURFACE WATER ROUTE

RELEASES

IS THERE AN OBSERVED RELEASE? Yes - Ref Part IV, Item 10

IS THERE A PERMITTED OUTFALL? Yes Ref Part I, Item 11

HAVE THERE BEEN PERMIT VIOLATIONS? No Ref Report did not indicate any violation of permit.

ROUTE CHARACTERISTICS

FACILITY LOCATION: other Ref Part IV, Item 13 (outside 500 yr flood zone)

24-HOUR RAINFALL: 2.75" Ref NCAPS manual, Fig D-3 Rainfall

DISTANCE TO SURFACE WATER (MILES): 550' (0.1 mile) Ref Part IV, Item 12

PHYSICAL STATE: Liquid
Ref Part II, WU 1, 2 & 3, Hazardous substances/physical state

CONTAINMENT: Fair unsound Leaky containers/ secondary containment. Ref Part II, WU 3, Description Historical documentation of leak from tank based on observed release to Pretty Kill Creek.

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: Nitric Acid Ref Part II WU 3 Hazardous substances/physical state

TOXICITY/PERSISTANCE VALUE: 9

QUANTITY KNOWN No

CUBIC YARDS OR TONS: Ref Part II, WU 3, Hazardous Waste Quantity Section
DRUMS :

Likely to be Large
Total of known tank capacities is 65,000 gallons. The capacity of the tank pits is not known.

TARGETS

SURFACE WATER USE: Assume Recreation Ref Part IV, Item 14
No surface water intakes within 15 miles downstream.

DISTANCE TO INTAKE OR CONTACT POINT (MILES): 550' (.1 mile) (contact point) Ref Part IV Item 12

DISTANCE TO SENSITIVE ENVIRONMENT (MILES): 5.6 (Wetland) Ref Part IV, Item 16 Ref #. 31

EPA ID NO. : NJD080619067

WS-3 AIR ROUTE

Note: The facility has 23 air permits currently in force, however the report does not provide any information on their associated emissions or processes. Therefore, they will not be considered as a potential contaminant source.

RELEASES

IS THERE AN OBSERVED, UNPERMITTED, ON-GOING RELEASE? No Ref Part IV, Item

DOES THE FACILITY HAVE AN AIR OPERATING PERMIT(S)? Yes Ref Part I, Item

HAVE THERE BEEN ANY PERMIT VIOLATIONS OR ODOR COMPLAINTS BY RESIDENTS? No Ref Part IV, Item 21

CAN CONTAMINANTS MIGRATE INTO AIR? Yes Ref Part II, WU 2, Hazardous Substance Physical State

CONTAINMENT: good sealed container/store open area Ref Part II, WU 2. Description, Drums were outside in an open area

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: Toluene Ref Part II WU 2, Hazardous substance physical st

TOXICITY/PERSISTANCE VALUE: 3 (Toxicity Table for Toluene)

QUANTITY KNOWN? N

CUBIC YARDS OR TONS:
DRUMS : Ref. Part II, WU 2

Likely to be large. (>100 cu yards)

WU 2 did not indicate actual storage facility other than the drums observed during inspection. 50 drums were observed during a 1992 inspection.

TARGETS

POPULATION: There is population within 4 miles Ref Part IV, Item 22

DISTANCE TO SENSITIVE ENVIRONMENT (MILES): 5.6 Part IV, Item 16, & 23

EPA ID NO. : NJ0080619067

WS-4 ON SITE CONTAMINATION

ACCESS TO SITE: Limited access (Assume barrier/partially open) Ref Fig 2 facility had fence but did not indicate the integrity of the fence.

IS THERE AN OBSERVED SURFACE SOIL CONTAMINATION? No. Ref Report did not indicate any surface soil contamination

CONTAINMENT: Fair (leaky containers/ Unsafe secondary containment) Ref Part II, WU 2, Description, Evidence of historical spills on concrete drum storage pad, no berming exists to prevent spills from migrating to exposed soil.

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: Toluene Ref Part II, WU Haz. Substance/Physical State

TOXICITY/PERSISTANCE VALUE: 3 (Toxicity Table for Toluene)

TARGETS

DISTANCE TO RESIDENTIAL AREAS (MILES): ½ Ref Part IV, Item 2

IS THERE AN ON-SITE SENSITIVE ENVIRONMENT: No. Ref Part IV Item 20

RCRA PRIORITIZATION SYSTEM SCORING SUMMARY

FOR

RONA PEARL DIVISION EM IND.

EPA SITE NUMBER: NJD080619067

BAYONNE, NJ

SCORED BY: ROB SAVILL

OF CDM FEDERAL

ORIGINAL RANKING: 09/27/93 LAST RANKING: 09/27/93

GROUNDWATER SCORE	:	8.78
SURFACE WATER SCORE	:	34.04
AIR ROUTE SCORE	:	10.96
ONSITE SCORE	:	3.43
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MIGRATION SCORE	:	18.49

EPA ID NO. : NJD080619067
RONA PEARL DIVISION EM IND.

WS-1 GROUNDWATER ROUTE

IS THERE AN OBSERVED RELEASE? P

ROUTE CHARACTERISTICS

DEPTH TO AQUIFER (FT.) : 19

NET PRECIPITATION (IN.) : 12

PHYSICAL STATE: LIQUID, GAS, SLUDGE

CONTAINMENT: FAIR

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: TOLUENE

TOXICITY/PERSISTANCE VALUE: 9

QUANTITY KNOWN? NO

CUBIC YARDS OR TONS: 0
DRUMS : 0

AMOUNT IS LIKELY TO BE LARGE

TARGETS

GROUNDWATER USE: AGRICULTURE OR INDUSTRIAL

DISTANCE TO WELL (MILES): 4.0

EPA ID NO. : NJD080619067
RONA PEARL DIVISION EM IND.

WS-2 SURFACE WATER ROUTE

RELEASES

IS THERE AN OBSERVED RELEASE? Y

IS THERE A PERMITTED OUTFALL?

HAVE THERE BEEN PERMIT VIOLATIONS?

ROUTE CHARACTERISTICS

FACILITY LOCATION: NA

24-HOUR RAINFALL: NA

DISTANCE TO SURFACE WATER (MILES): NA

PHYSICAL STATE: NA

CONTAINMENT: NA

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: NITRIC ACID

TOXICITY/PERSISTANCE VALUE: 9

QUANTITY KNOWN? NO

CUBIC YARDS OR TONS: 0
DRUMS : 0

AMOUNT IS LIKELY TO BE LARGE

TARGETS

SURFACE WATER USE: POSSIBLE DRINKING WATER OR RECREATION

DISTANCE TO INTAKE OR CONTACT POINT (MILES): 0.1

DISTANCE TO SENSITIVE ENVIRONMENT (MILES): 5.6

EPA ID NO. : NJD080619067
RONA PEARL DIVISION EM IND.

WS-3 AIR ROUTE

RELEASES

IS THERE AN OBSERVED, UNPERMITTED, ON-GOING RELEASE? N

DOES THE FACILITY HAVE AN AIR OPERATING PERMIT(S)? Y

HAVE THERE BEEN ANY PERMIT VIOLATIONS OR ODOR COMPLAINTS BY RESIDENTS? N

CAN CONTAMINANTS MIGRATE INTO AIR? Y

CONTAINMENT: GOOD

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: TOLUENE

TOXICITY/PERSISTANCE VALUE: 3

QUANTITY KNOWN? NO

CUBIC YARDS OR TONS: 0
DRUMS : 0

AMOUNT IS LIKELY TO BE LARGE

TARGETS

POPULATION: RESIDENCES ARE LOCATED WITHIN FOUR MILES

DISTANCE TO SENSITIVE ENVIRONMENT (MILES): 5.6

WS-4 ON SITE CONTAMINATION

ACCESS TO SITE: LIMITED ACCESS

IS THERE AN OBSERVED SURFACE SOIL CONTAMINATION? N

CONTAINMENT: FAIR

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: TOLUENE

TOXICITY/PERSISTANCE VALUE: 3

TARGETS

DISTANCE TO RESIDENTIAL AREAS (MILES): 0.50

IS THERE AN ON-SITE SENSITIVE ENVIRONMENT: N

RCRA PRIORITIZATION SYSTEM SCORING SUMMARY

FOR Rona Pearl Division EM Ind.

EPA SITE NUMBER: NJD 080619067

Bayonne, N.J.

SCORED BY: N. R. Thakuria

OF CDM Federal

ON 8/10/93

GROUNDWATER SCORE :

SURFACE WATER SCORE:

AIR ROUTE SCORE :

ONSITE SCORE :

.....

MIGRATION SCORE :

Ref Final Draft
Environmental Priorities Initiative
Preliminary Assessment Report.
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WS-1 GROUNDWATER ROUTE

IS THERE AN OBSERVED RELEASE? No Ref Part IV, Item 1
Score Possible

ROUTE CHARACTERISTICS

DEPTH TO AQUIFER (FT.) : <20' Ref Part IV, Item 2

NET PRECIPITATION (IN.) : 12' Ref NCAPS Manual
Fig D-1 Annual Precipitation
Fig D-2 Annual Lake Evaporation

PHYSICAL STATE: Liquid
Ref Part II, WU 1, 2 & 3, Hazardous Substance/physical state

CONTAINMENT: Fair Ref Part II, WU #2 Description
Leaky container/ Unsound secondary containment. Evidence of historical spills on concrete drum storage pad; no berming exists.

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: Toluene Ref Part II WU 2, Haz. Substance/physical State

TOXICITY/PERSISTANCE VALUE: 9

QUANTITY KNOWN? No

CUBIC YARDS OR TONS: Ref Part II, WU 2,3, Item H Hazardous waste Quantity
DRUMS : 50 drums are observed during 1992 inspection.
WU 2 did not indicate the actual capacity other than the drums observed during inspection.

Likely to be large (710 cu. yards)

Additionally, waste unit 3 total known tank capacity is in excess of 65,000 gallons.

TARGETS

GROUNDWATER USE: Industrial/Commercial Ref Part IV Item 9

DISTANCE TO WELL (MILES): Ref Part IV Item 6

Residents do not obtain drinking water from within 4 miles of the Site. As per NCAPS guidance, assume greater than 4 miles.

EPA ID NO. : NJD080619067

WS-2 SURFACE WATER ROUTE

RELEASES

IS THERE AN OBSERVED RELEASE? Yes - Ref Part IV, Item 10

IS THERE A PERMITTED OUTFALL? Yes Ref Part I, Item 11

HAVE THERE BEEN PERMIT VIOLATIONS? No Ref Report did not indicate any violation of permit.

ROUTE CHARACTERISTICS

FACILITY LOCATION: other Ref Part IV, Item 13 (out side 500 yr flood zone)

24-HOUR RAINFALL: 2.75" Ref NCAPS Manual, Fig D-3 Rainfall

DISTANCE TO SURFACE WATER (MILES): 550' (0.1 mile) Ref Part IV, Item 12

PHYSICAL STATE: Liquid
Ref Part II, WU 1,2 & 3, Hazardous substance/physical state

CONTAINMENT: Fair unsound Leaky containers/ secondary containment. Ref Part II, WU 3, Description Historical documentation of leak from tank based on observed release to Pretty Kill Creek.

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: Nitric Acid Ref Part II WU 3 Hazardous substance/physical state

TOXICITY/PERSISTANCE VALUE: 9

QUANTITY KNOWN? No

CUBIC YARDS OR TONS: Ref Part II, WU 3, Hazardous Waste Quantity Section
DRUMS :

Likely to be Large
Total of known tank capacities is 65,000 gallons. The capacity of the tank pits is not known.

TARGETS

SURFACE WATER USE: Assume Recreation Ref Part IV, Item 14
No surface water intakes within 15 miles downstream.

DISTANCE TO INTAKE OR CONTACT POINT (MILES): 550' (.1 mile) (contact point) Ref Part IV Item 12

DISTANCE TO SENSITIVE ENVIRONMENT (MILES): 5.6 (Wetland) Ref Part IV, Item 16 Ref # 31

EPA ID NO. : NJD080619067

WS-3 AIR ROUTE

Note: The facility has 23 air permits currently in force, however the report does not provide any information on their associated emissions or processes. Therefore, they will not be considered as a potential contaminant source.

RELEASES

IS THERE AN OBSERVED, UNPERMITTED, ON-GOING RELEASE? No Ref Part IV, Item 2

DOES THE FACILITY HAVE AN AIR OPERATING PERMIT(S)? Yes Ref Part I, Item 1

HAVE THERE BEEN ANY PERMIT VIOLATIONS OR ODOR COMPLAINTS BY RESIDENTS? No Ref Part IV, Item 21

CAN CONTAMINANTS MIGRATE INTO AIR? Yes Ref Part II, WU 2, Hazardous Substances Physical State

CONTAINMENT: good Ref Part II, WU 2. Description, Drums were sealed container/store open area outside in an open area

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASYE CODE NUMBER: Toluene Ref Part II WU 2, Hazardous Substances physical st

TOXICITY/PERSISTANCE VALUE: 3 (Toxicity Table for Toluene)

QUANTITY KNOWN? N

CUBIC YARDS OR TONS:
DRUMS :

Likely to be large. (>10 cu yards)

Ref. Part II, WU 2
WU 2 did not indicate actual storage facility other than the drums observed during inspection. 50 drums were observed during 1992 inspection

TARGETS

POPULATION: There is population within 4 miles Ref Part IV, Item 22

DISTANCE TO SENSITIVE ENVIRONMENT (MILES): 5.6 Part IV, Item 16, & 23

EPA ID NO. : NJ 0080619067

WS-4 ON SITE CONTAMINATION

ACCESS TO SITE: Limited access (Assume barrier/partially open) Ref Fig 2, facility had fence but did not indicate the integrity of the fence.

IS THERE AN OBSERVED SURFACE SOIL CONTAMINATION? No. Ref Report did not indicate any surface soil contamination

CONTAINMENT: Fair (leaky containers/ Unsound secondary containment) Ref Part II, WU 2, Description, Evidence of historical spills on concrete drum storage pad; no berming exists to prevent spills from migrating to exposed soil.

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: Toluene Ref Part II, WU Haz. Substance/Physical State

TOXICITY/PERSISTANCE VALUE: 3 (Toxicity Table for Toluene)

TARGETS

DISTANCE TO RESIDENTIAL AREAS (MILES): ½ Ref Part IV, Item 2

IS THERE AN ON-SITE SENSITIVE ENVIRONMENT: No. Ref Part IV Item 20

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 ➤ NJD078714433

Bendix Corp - TETERBORO FACILITY
ROUTE 46
TETERBORO NJ 07608
ATTN: W.A. HOOPER, MGR. PLANT ENGR.

INSTALLATION ADDRESS ➤ same

EPA Form 8700-12B (4-80)

Sent 5/20/80

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

Form Approved OMB No. 158-S79016
GSA No. 0245-EPA-OT

U.S. ENVIRONMENTAL PROTECTION AGENCY

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.	
I. NAME OF INSTALLATION	
II. INSTALLATION MAILING ADDRESS	PLEASE PLACE LABEL IN THIS SPACE
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	APPROVED	DATE RECEIVED (yr., mo., & day)
F NJD098714433 TA 21		80 08 18

I. NAME OF INSTALLATION

THE BENDIX CORP. TETERBORO FACILITY

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3 ROUTE 46

CITY OR TOWN	ST.	ZIP CODE
4 TETERBORO ~~NEW JERSEY~~	NJ	07608

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 5 ROUTE 46

CITY OR TOWN	ST.	ZIP CODE
6 TETERBORO ~~NEW JERSEY~~	NJ	07608

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)	PHONE NO. (area code & no.)
2 HOOPER WILLIAM MGR PLANT ENGR	201-288-2000

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 THE BENDIX CORPORATION

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

W	N	J	D	0	7	8	7	1	4	4	3	3	2	1

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 F001	2 F003	3 F005	4 F006	5 F007	6 F008
7 F009	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
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 P015	32 U151	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.)*

- [X] 1. IGNITABLE (D001)
- [X] 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
D. W. Gabrielsen	Douglas W. Gabrielsen, Director of Operations	8/15/80

RP

(Fill-in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175

NJD078714433

	X	
X		
X		X
	X	
	X	

	X	
	X	
	X	
	X	
	X	

BENDIX CORP. TETERBORO FACILITY

HOOPER WILLIAM MGR. PLANT ENGR. 201 288 2000

RTE. 46

TETERBORO NJ 07608

RTE. 46

BERGEN

TETERBORO NJ 07608

EPA Form 3510-1 (6-80)

CONTINUE ON REVERSE

3761	(specify) Guidance & Control Systems Missiles & Space Vehicles	3811	(specify) Navigation & Control Systems Aircraft
3662	(specify) Object Detection Apparatus-Electronic, Aerospace Nav. & Control	3728	(specify) Aircraft Parts & Auliliary Equipment

THE BENDIX CORPORATION

P (specify) 201 288 2000

TE. 46

TETERBORO NJ 07608

NJ0002097

(specify)

(specify)

The Bendix Corporation, Teterboro Facility, Comprises of three (3) intra divisions engaged in the manufacturing of Aerospace Electronic Systems. ie. Guidance and Control Systems for Missiles and Space Vehicles, Navigation and Control Systems for Aircraft, and Automated Electronic Inspection & Testing of Navigation & Control Systems for Commerical and Military Aircraft. Also included is Research and Development Engineering in Aerospace & Electronic Systems.

Manufacturing Operations consist of : Machining, printed circuit board mfg., plating, tumbling, and assembly operations.

F9: A/S1

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
	R. Eck	11/18/80

(Fill—in areas are spaced for elite type, i.e., 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

F U J D 0 7 8 7 1 4 4 3 3 PAGE 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)*

	YR.	MO.	DAY
8	8 0	0 7	2 3

[ ] 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.

C DUP

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 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. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1	S 0 1	3300000	G		7				
2	S 0 2	26300000	G		8				
3	T 0 1	220000000	U		9				
4					10				

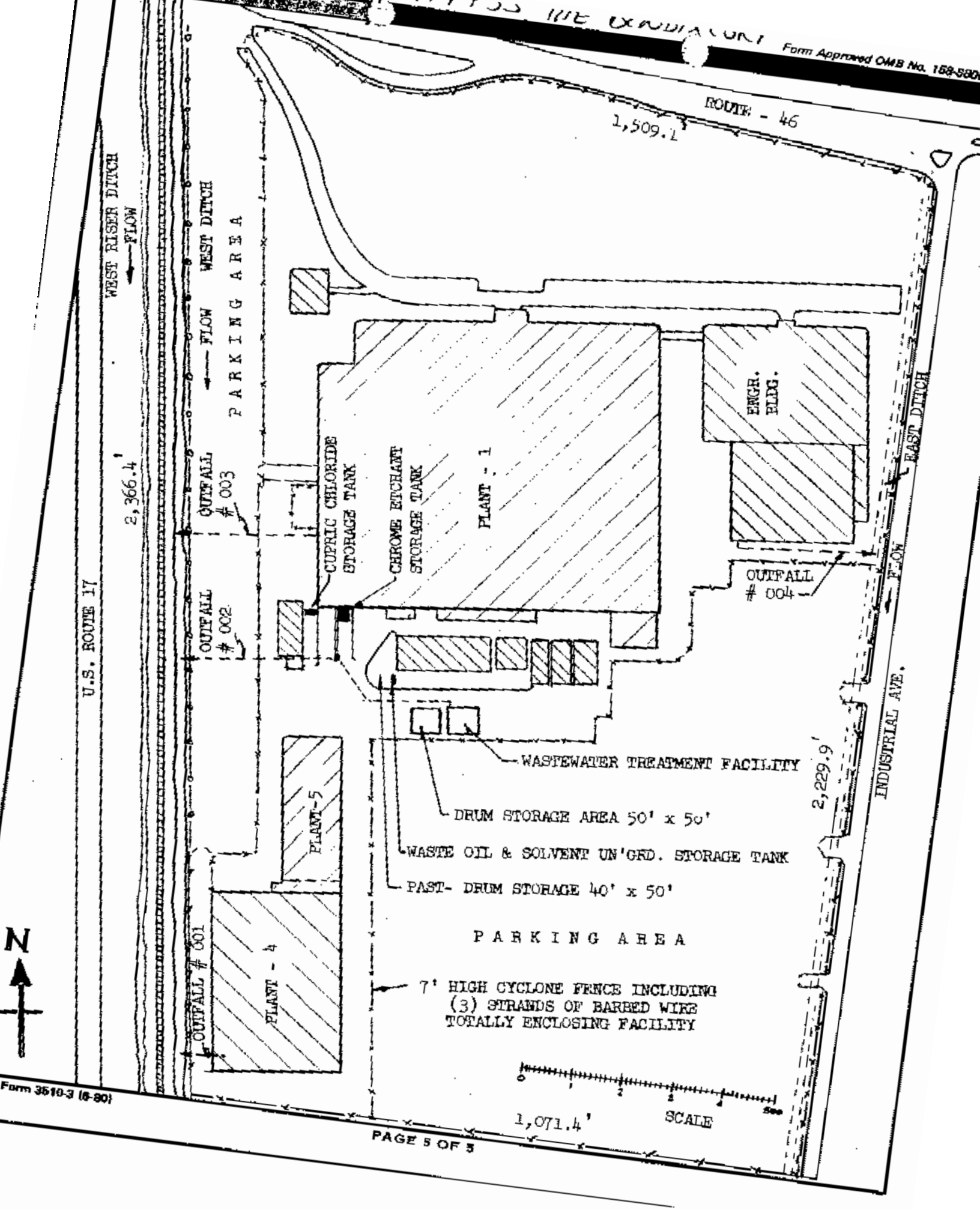
Continued from page 2.
NOTE: Photocopy this page before comp[illegible] if you have more than 26 wastes to list.

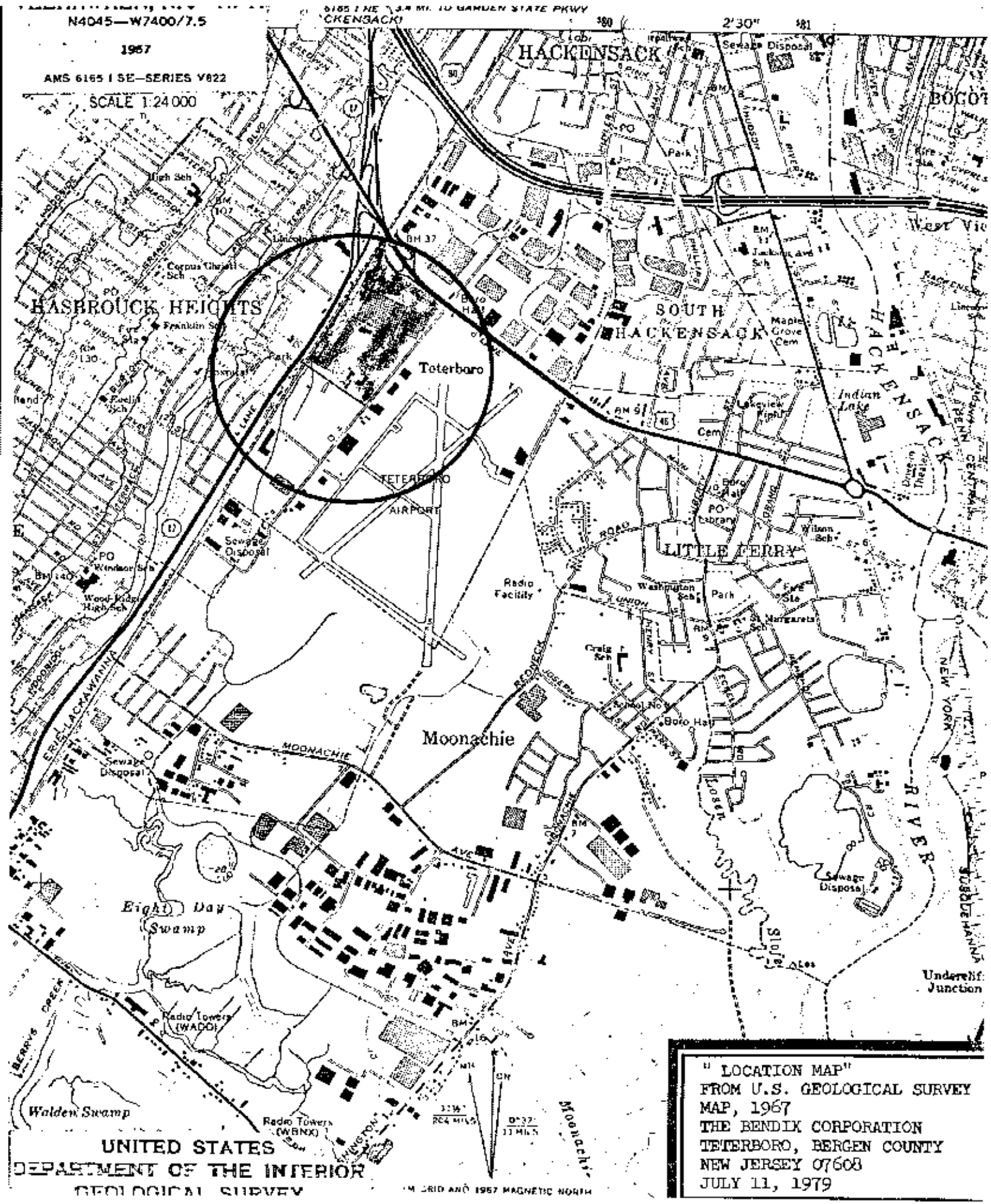
Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)	FOR OFFICIAL USE ONLY
W N J D 0 7 8 7 1 4 4 3 3 — T/A 3, C 1	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	F 0 0 1	9000	T	S 0 1				
2	F 0 0 3	5000	T	S 0 2				
3	F 0 0 5	5000	T	S 0 2				
4	F 0 0 6	60000	T	S 0 1				
5	F 0 0 7	2.500	T	S 0 2	T 0 1			
6	F 0 0 8	1000 000	P	S 0 2	T 0 1			
7	F 0 0 9	200 000	T	S 0 2	T 0 1			
8	P 0 1 5	18 000	P	S 0 1				
9	U 1 5 1	150 000	P	S 0 1				
10	D 0 0 1	1500 000	P	S 0 1				
11	D 0 0 2	27 000	T	S 0 2				
12								
13								
14								
15								
16								
17								
18								
19								
20								
21								
22								
23								
24								
25								
26								

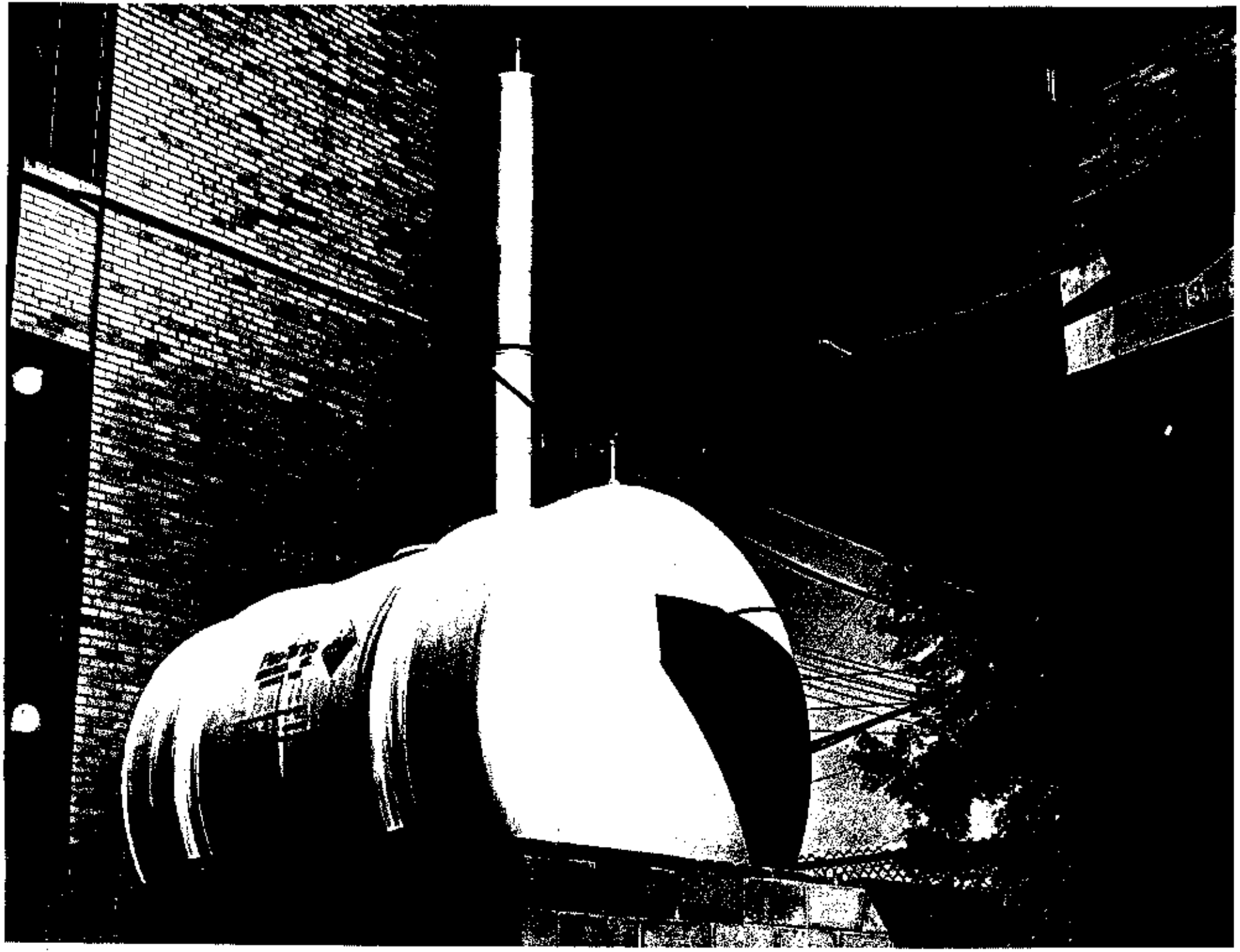

ROUTE - 46
1,509.1'
WEST RISER DITCH
FLOW
WEST DITCH
FLOW
PARKING AREA
2,366.4'
OUTFALL # 003
OUTFALL # 002
U.S. ROUTE 17
CUPRIC CHLORIDE STORAGE TANK
CHROME ETCHANT STORAGE TANK
PLANT - 1
ENGR. BLDG.
EAST DITCH
FLOW
OUTFALL # 004
INDUSTRIAL AVE.
2,229.9'
WASTEWATER TREATMENT FACILITY
DRUM STORAGE AREA 50' x 50'
WASTE OIL & SOLVENT UN'GRD. STORAGE TANK
PAST- DRUM STORAGE 40' x 50'
PARKING AREA
PLANT-5
PLANT - 4
OUTFALL # 001
7' HIGH CYCLONE FENCE INCLUDING (3) STRANDS OF BARBED WIRE TOTALLY ENCLOSING FACILITY
N
1,071.4'
SCALE



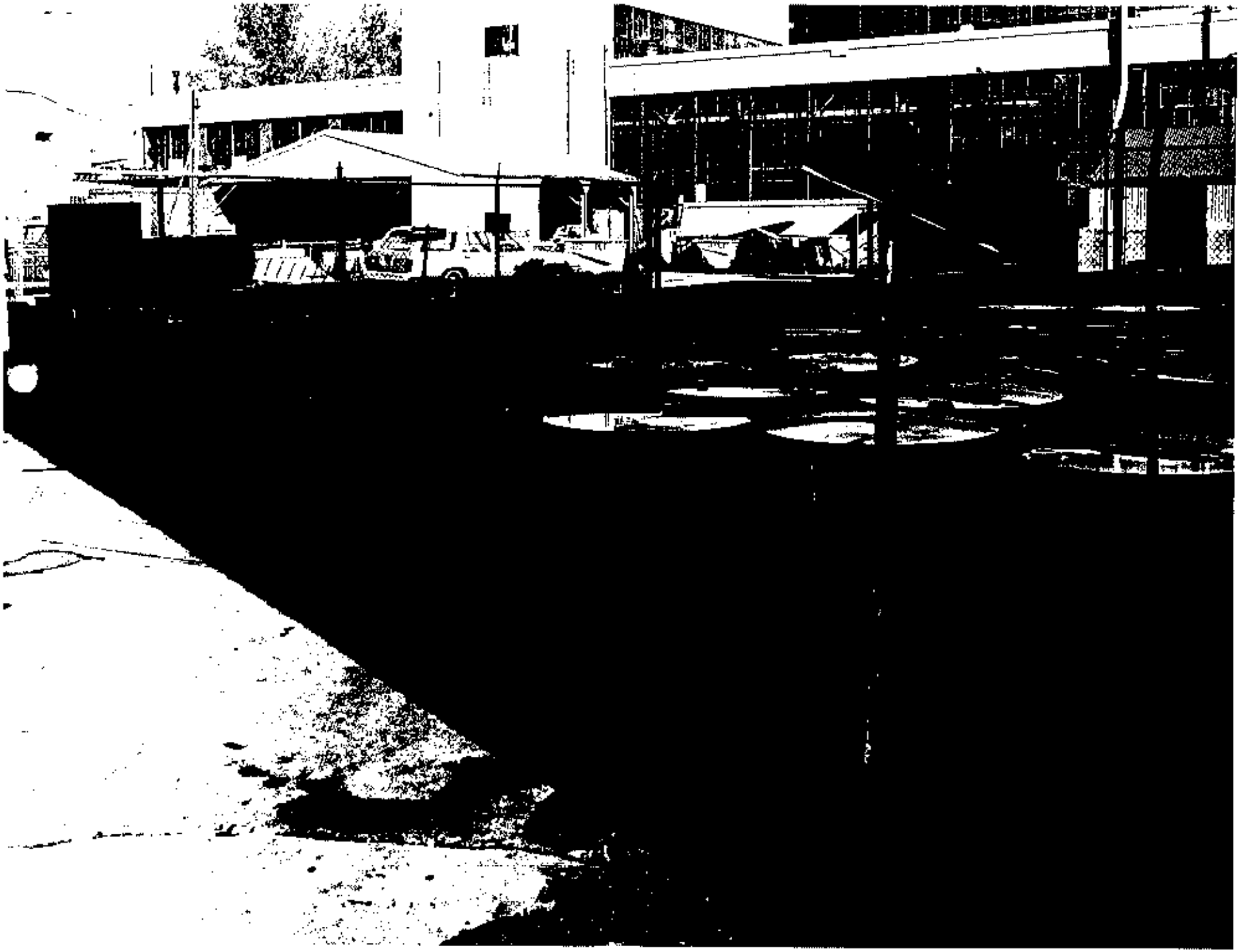
" LOCATION MAP"
FROM U.S. GEOLOGICAL SURVEY
MAP, 1967
THE BENDIX CORPORATION
TETERBORO, BERGEN COUNTY
NEW JERSEY 07608
JULY 11, 1979

WASTEWATER TREATMENT FACILITY

OVER



CUPRIC CHLORIDE STORAGE TANK
WITH SPILL CONTAINMENT WALL



PAST-DRUM STORAGE AREA

Bendix

IN-GROUND CHROME ETCHANT STORAGE TANK

Bendix

Bendix

Guidance Systems Division

Teterboro, N.J. 07608
Tel (201) 288-3200

The Bendix Corporation

Environmental Protection Agency Region II
Hazardous Waste Permit Section
26 Federal Plaza
New York, N.Y. 10007

Attn: Mr. Harry Ruisi

November 17, 1980

Re: Hazardous Waste Permit Application
The Bendix Corporation (NJD 042 797 274)

Dear Mr. Ruisi:

The Bendix Corporation of Teterboro, New Jersey, hereby submits their Hazardous Waste Permit Application - Part "A", Forms 1 and 3 as required by the Resource Conservation Recovery Act of 1976.

Please note that we were unable to complete the EPA I.D. No..Bendix upon filing their initial Hazardous Waste Notification form in August 1980, indicated at that time they had not received their EPA I.D. No. and formally requested same.

We still do not have a confirmed I.D. No. despite a subsequent registered letter, unanswered, and numerous telephone calls which resulted in obtaining information only that, the EPA I.D. No. listed above had been assigned to the Bendix Corporation, 43 William Ave., Hasbrouck Heights, New Jersey. We then stated, although this had not been the legal address for this location in over 35 years, could we use that I.D. No.?. We were informed that, since there was this seemingly incongruity in address, they could not verbally confirm our use of this identification.

Bendix respectfully requests that you correct your records to indicate our legal mailing address (Rte.46, Teterboro, N.J. 07608) and that we receive written confirmation as to our proper EPA I.D. No. to be used by this facility.

An Equal Opportunity Employer M/F

Bendix

An early response to this request will be greatly appreciated.

Thanking you in advance for your cooperation, we remain.

Very truly yours,

William A. Hooper, Manager
Plant Engineering

WAH/cam
cc: D. W. Gabrielsen
W. Graham
K. Wallack, Esq.
G. George

ADM-015
2/94

State of New Jersey
Department of Environmental Protection and Energy

REFERRAL FORM

Date 4/29/96

TO	FROM
Joel Golumbek	Jeff Streeing
EPA Region 2	NJDEPE
HWCB	TELEPHONE EXT. 201-669-3900

For Your ☐ ACTION ☐ APPROVAL ☐ INFORMATION ☑ REVIEW
☐ COMMENTS ☐ SIGNATURE ☐ FILE ☐

Joel,

Please Review this.

file

NJ VEI/RCRIS COMPLIANCE, MONITORING AND ENFORCEMENT LOG (CMEL)

DATE SUBMITTED: 4/6/94 REGION: 02 ADD [✓] CHANGE [ ] DELETE [ ]

EPA ID NUMBER: NJD 078 714 433 IF NON-NOTIFIER CHECK HERE: [ ]

FACILITY NAME: Allied ~~Aviation~~ SIGNAL/Bendix CONTACT: William Hooper

PHONE: (201) 288-2000 STREET: Rt. 46 East

COUNTY/MUNIC. CODE: 0262

CITY: Teterboro STATE: NJ ZIP: 07608

BLOCK: LOT:

CORP. NAME: CORP. STREET:

CORP. CITY: CORP. STATE: CORP. ZIP:

CORP. PHONE: ( ) CORP. CONTACT:

FILE NUMBER: 02-62-04

MAILING NAME: TELEPHONE:

MAILING CONTACT: CONTACT TITLE:

MAILING STREET: ADD'L ADDRESS:

MAILING CITY: MAILING STATE: MAILING ZIP:

INITIAL INSPECTION DATE: 3/30/94 DATE NOV ISSUED: FEE: (Y/N)

FED. REGULATED: (Y/N) SCHED. COMP. DATE

INSPECTOR'S NAME: McQ DATE COMP. ATTAINED:

REG. STATUS CODE: 01 EVAL. TYPE CODE: G1 [ ] [ ] GRANT CODE: 01 [ ] [ ]

RCRIS EVALUATION TYPE: CEI RCRIS REASON CODE: [ ] MULTIMEDIA: (Y/N)

FOLLOWUP INSPECTION DATE: / / INSPECTOR'S NAME:

EVALUATION TYPE CODE: [ ] GRANT CODE: [ ] [ ] FOLLOWUP FEE: (Y/N)

RCRIS EVALUATION TYPE: [ ]

CLASS OF VIOLATION (9 = I*)	GW	CLO	$$$	PTB	SCH	MNF	LDB	OTH	
I*						O		O	X=VIOLATION
I						O	P	O	O=NO VIOLATION
II						O		O	P=PENDING

	EVALUAT	VIOLATION		EVALUAT	VIOLATION		EVALUAT	VIOLATION
GER	E|NE|NA	O|P|9|1|2	TMR	E|NE|NA	O|P|9|1|2	DPB	E|NE|NA	O|P|9|1|2
GMR	E|NE|NA	O|P|9|1|2	TLB	E|NE|NA	O|P|9|1|2	DFR	E|NE|NA	O|P|9|1|2
GLB	E|NE|NA	O|P|9|1|2	DOT	E|NE|NA	O|P|9|1|2	DCL	E|NE|NA	O|P|9|1|2
GSO	E|NE|NA	O|P|9|1|2	DMR	E|NE|NA	O|P|9|1|2	DGW	E|NE|NA	O|P|9|1|2
TFI	E|NE|NA	O|P|9|1|2	DLB	E|NE|NA	O|P|9|1|2	DIN	E|NE|NA	O|P|9|1|2
TRI	E|NE|NA	O|P|9|1|2	COMMENTS:					

FILE #: 02-62-04

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION & ENERGY

DIVISION OF FACILITY WIDE ENFORCEMENT

BUREAU: M

GENERATOR INSPECTION REPORT

FACILITY INFORMATION

FACILITY NAME: Allied Signal Aerospace (Bendix)

EPA ID NUMBER: NJD002174433 CASE NUMBER:

STREET ADDRESS: Route 46

MUNICIPALITY: Teterboro ZIP: 07608 COUNTY: Bergen

MAILING ADDRESS: —
(if different)

BILLING ADDRESS: —
(if different)

TELEPHONE #: 201-288-2000 FAX #:

BLOCK : — LOT : —

FACILITY PERSONNEL: Mark Schwind
(name & title)
William Hooper

INSPECTION DATE: 3/30/94

INSPECTOR'S NAME & TITLE: McGuigan

OTHER STATE/EPA PERSONNEL:

REPORT PREPARED BY: McG

REVIEWED BY: [signature] DATE OF REVIEW: 4/26/94

DFWE 29 REV. 2/22/93

INSPECTION DATE(S): 3/30
TIME IN:
TIME OUT:

PHOTOS TAKEN: YES(____) NO(____) QUANTITY(____) ATTACH PHOTO LOG

SAMPLES TAKEN: YES(____) NO(____) HOW MANY(____) ATTACH SAMPLE LOG

SITE BACKGROUND INFORMATION

EMPLOYEES: 1300 – 1500 SHIFTS/WEEK: 1/5

DATE OPERATIONS BEGUN: 1938 SIC CODE:

ACRES: 70.2 # OF BUILDINGS/SQFT:

PRODUCTS PRODUCED:

PREVIOUS OPERATIONS AT SITE:

WATER SUPPLY- PUBLIC: city PRIVATE WELL: yes, never used

SOLID WASTE DISPOSAL: —

FLOOR DRAINS: —

DRAINS CONNECTED TO- POTW: — SEPTIC SYSTEM:

MONITORING WELLS: ~20-25

NON-HW. TANKS ON SITE : fuel oil tank - 50K

AIR PERMITS: yes

NJPDES PERMITS: —

OTHER PERMITS: —

DFWE 29
REV 02/22/93

New Jersey Department of Environmental Protection & Energy
Division of Enforcement Field Operations
Metro Bureau of Water and Hazardous Waste Enforcement

R E P O R T

File #: 02-62-04 **Date:** 3/30/94

Investigator: William P. McQuiggan Jr.

Location: Allied Signal Aerospace (Bendex) (NJD078714433)

Address: Route 46

Teterboro, NJ 07608

Location Phone #: 201-288-2000

Nature of Visit: RCRA Inspection

OVERVIEW: A RCRA inspection was conducted on 3/30/94 in order to ascertain compliance with RCRA generator requirements. The facility was represented by Mark Schwind, Principal Environmental Engineer, Jeffrey Ells, Environmental Consultant (Ebasco), and Scott Fore, Environmental Engineer.

BACKGROUND: There is an extensive file history on Bendex/Allied. The facility was known as Bendex but was bought out by Allied Signal (AS) several years ago (EPA notification was made). The last RCRA was performed in 1989 with minor violations cited for manifests and no approval for above ground tank storage. The previous RCRA to this was conducted in 1986 with no violations cited. AS delisted from TSDF to generator in 1987.

COMPANY INFORMATION: AS is an R & D facility for guidance control

systems, specializing mainly in military applications. AS has historically divided it's operations into three main areas: first is Flight Systems, second is Test Stands, and third is Guidance Systems. AS has now merged these three divisions into one operating division with a scaling back in overall facility operations. For detailed company information see file for previous RCRA reports.

COMPLIANCE AREAS: A tour of the facility was conducted starting with the multiple laboratories on-site (Plant 1 is the main laboratory building, see Attachment A for site map). As there are too many laboratories to inspect all of them, a spot check of random labs was conducted. The only hazardous waste found during this process was 1 x 55 gallon drum of TCE, with appropriate labeling for a satellite accumulation container. Following Plant 1, was a tour of the outdoor storage areas including Maintenance, Oil House, Raw Stock storage, and the waste water treatment facility. The waste water treatment facility is not operating at full capacity due to the fact that AS is upgrading to start a new discharge to groundwater. In the meantime, their current discharge does not require a permit as verified by a letter from BCUA (see Attachment B).

The Hazardous Waste Storage Shed was inspected next. The following materials were found in storage:

1 x 55 G Unknown

1 x 30 G P015 (Beryllium Compounds)

1 x 55 G P015

1 x 55 G X725

2 x pallets containing batteries

1 storage case containing misc. lab pack material

1 x 5 G F001

2 x 55 G D002

3 x 55 G F001

1 x 55 G Freon (F001)

4 x 55 G X726

3 x 55 G F003

All containers were properly labeled and under the 90 day storage clock.

Plants 4 & 5 were inspected next and were found to be closed down with no occupants or operations.

Lastly, the plant Power House was inspected, with no violations noted.

A review of paperwork was conducted from 1/1/91 through 3/30/94. No violations were cited but the following manifests were found without LDR:

NJA0996947	NJA0996964
NJA0996961	IL03412239

A review of personnel training, Contingency Plan, and preparedness and prevention was conducted with no violations cited (see Attachment C for representative copies).

Following the RCRA inspection, AS personnel were questioned about an adjacent piece of property that has been tied to AS. The site in question is Sumitomo Machine Corp. The following history is told by AS:

The property in question was once owned by AS. In the 70's

the property was sold to Sumitomo. In the late 80's Sumitomo attempted to sell the property, and during an ECRA investigation it was discovered that the property was grossly contaminated with NORM (Naturally Occurring Radioactive Material), and a host of other RCRA Volatile Organics. Sumitomo claimed that the contamination was from AS, and after some legal battling, AS agreed to take over responsibility for the cleanup.

Currently the site is storing 265 x 3 Tons Steel boxes which contain mixed waste contaminated soils removed from the site (with potentially 50,000 cu./ft. of contaiminated soil yet to be removed from the ground). These soils are to be treated on-site in a thermal desorption unit (see Attachment D for information package) to remove the VO's, and the remaining radioactive soil will be sent to Utah for landfilling. It should be noted that the thermal desorption unit has been exempted from hazardous waste facility permitting by the Department (see Attachment E).

During a tour of this site following the RCRA at AS, these stored containers were visually verified. According to site personnel, the thermal desorption unit had broken down, while the facility was waiting for the final go ahead from ECRA (now ISRA) to treat and remove the soil. Site personnel stated that they hoped to be up and running by the following week. During the site tour it was noticed that there were 11 x 3 Ton Boxes located inside the building, separate from the Radioactive Box Storage Area. Personnel stated that these boxes only contained soils contaminated with F-listed waetee, and no Radioactive materials. Personnel stated that this soil had been removed from inside the

building in order to place a vapor extraction unit in the ground as part of the site cleanup. Personnel stated that this soil would also be treated in the thermal desorption unit and then placed back in the ground on-site.

EPA Region II was contacted in order to ascertain if this method of treatment was acceptable in view of the mixture rule. Jim Sullivan of EPA researched the question and stated that EPA contained a new policy for contaminated soils known as "contained-in" policy (see Attachment F for details). Essentially the manner in which the Sumitomo site is being managed with ISRA oversite is acceptable by EPA.

The site is a current ECRA case with Notice # 88737. The case manager, Grace Jacobs, was contacted to ascertain the status of the site. Ms. Jacobs stated that the thermal desorption unit should be up and running soon, and she knew of no other site conflicts.

SUMMARY: A RCRA was conducted at AS on 3/30/94. No violations were cited. Investigation into the adjacent Sumitomo site was conducted revealing no current need for enforcement intervention.

HAZARDOUS WASTE INVENTORY

LOCATION	WASTE CODES	DESCRIPTION	QUANTITY PRESENT
		SEE NARRATIVE	

add additional pages as needed

DFWE 29
REV 02/22/93

MANIFESTS REVIEWED

Manifests reviewed from 1/1/91 through 3/30/94

Number of manifests in compliance: 198

Number of manifests NOT in compliance: 0

Total number of manifests reviewed: 198

According to the manifests, does the facility import or export any waste? YES___ NO ✓

(if yes, complete the import/export section of this report)

List manifest document numbers of those manifests not in compliance and note each deficiency.

Attach copies of manifests which have deficiencies.

Manifest#	DATE	N.J.A.C.7:26-	Comments
NJA0996947			NO LDR
NJA0996964			
NJA0996961			
IL0341223 9			

add additional pages as needed

DFWE 29
REV 02/22/93

GENERATOR INDEX

CHECK THE SECTIONS AND ACTIVITIES OF THIS REPORT WHICH ARE APPLICABLE TO THE FACILITY AND COMPLETE THOSE SECTIONS FOR THIS INSPECTION.

GENERATOR WASTE MANAGEMENT PRACTICES

#	SECTION	PAGE	
1.	WASTE DETERMINATION	7.	_____
2.	GENERATOR STATUS	8.	_____
3.	SATELLITE STORAGE AREAS	9.	_____
4.	< 90 DAY CONTAINER STORAGE AREAS	10.	_____
5.	WASTE OIL USAGE	11.	_____
6.	< 90 DAY ABOVE GROUND TANKS STORAGE AREAS	12.	_____
7.	WASTE MANAGEMENT PRACTICES	13.	_____
8.	GENERATOR MANIFESTS	14.	_____
9.	EXPORTING HAZARDOUS WASTE	16.	_____
10.	CONTINGENCY PLAN & EMERGENCY PROCEDURES	17.	_____
11.	PERSONNEL TRAINING	19.	_____
12.	PREPAREDNESS & PREVENTION	21.	_____
13.	"WASTE WATER TREATMENT UNIT" QUALIFICATION	23.	_____

SECTION 1.

WASTE DETERMINATION:

	YES	NO
DOES the facility generate "solid waste".	/	
DOES the facility generate a "hazardous waste".	/	
IS THE FACILITY CORRECTLY CLASSIFYING ITS WASTES?	/	

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.

8.5(a) Generator failed to determine if its "solid waste" is hazardous? _____

7.4(x) Generator FAILED to properly classify its waste according to the "Hierarchy". _____

COMMENTS

SECTION 2.

GENERATOR STATUS

	YES	NO
Does the generator generate/accumulate >100 kg of hazardous waste (1kg acutely) or greater than 1001 gal of listed waste oil in any calender month? (except x725 - 100 kg rule applies)	/	
IF YES,		
7.4(a)1 Does the Generator have an EPA ID number.	/	
IF THE GENERATOR IS A SQG.,		
Does the generator wish to deactivate his EPA ID. number?		

COMMENTS

DFWE 29
REV 02/22/93

SECTION 3.

SATELLITE ACCUMULATION AREAS

	YES	NO
IS THE FACILITY IN COMPLIANCE WITH THE SATELLITE ACCUMULATION REGULATIONS?	/	

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.

9.3(d)1	Quantity of waste EXCEEDS 55 gal.or 1 qt. of acutely hazardous waste.	_____
9.3(d)2	Containers FAIL to:	
	Meet the standards of 7.2 (Container Requirements).	_____
	Poor or leaking container.	_____
	Container made of incompatable material.	_____
	Container not kept securely closed.	_____
9.3(d)3	Accumulation area is:	
	NOT at or near a point of generation.	_____
	NOT under the control of the operator.	_____
9.3(d)4	Containers are NOT marked "Hazardous waste".	_____
9.3(d)5	Containers NOT marked with date when filled.	_____
9.3(d)6	Containers were NOT moved from satellite area within three days.	_____

COMENTS

_____

_____

_____

_____

_____

SECTION 4.

GENERATOR CONTAINER STORAGE AREAS

	YES	NO
IS THE FACILITY IN COMPLIANCE WITH THE GENERATOR STORAGE REGULATIONS?	/	

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.

7.2(a)	NO manifest number on containers ready for disposal.	
7.2(b)	Containers FAILED to meet DOT regulations. (49 CFR 171,179)	
9.3(a)1	Waste ACCUMULATED OVER 90 DAYS.	
9.3(a)3	Containers NOT marked with accumulation start date or "Hazardous Waste".	
9.4(d)1i	Containers NOT of adequate construction.	
9.4(d)1ii	Closures NOT of sufficient strength.	
9.4(d)2	Containers NOT in good condition.	
9.4(d)3	Containers NOT compatible with waste.	
9.4(d)4i	Containers NOT kept closed.	
9.4(d)4ii	Containers NOT properly handled.	
9.4(d)4iv	Hazardous wastes NOT segregated.	
9.4(d)4v	ID Labels NOT visible.	
9.4(d)5	Accumulation area NOT inspected daily.	
9.4(d)6	Containers of ignitable and reactive wastes are NOT located at least 50 feet from the facility's property line.	
9.6(d)	Access to communication or alarm system is NOT maintained.	
9.6(e)	INADEQUATE aisle space.	

SECTION 5

WASTE OIL

	YES	NO
IS THE FACILITY IN COMPLIANCE WITH THE WASTE OIL STORAGE REGULATIONS?	✓	

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.

The generator ONLY generates or accumulates less than 1001 gals. of waste oil per month and:

7.7(d) Generator FAILED to obtain receipts and retain them for three years. _____

9.2(b) If under ground tanks are used to store waste oil, the generator is NOT a:

1. New commercial service station waste oil tanks of <1001 gal capacity* _____

or does NOT:

2. Use underground tanks in existence and in use for Hazardous Waste storage prior to 1/17/83. _____

NOTE: If the generator accumulates over 100 kg of hazardous waste and <1001 gal of waste oil, he must manifest off the waste oil but does not have to comply with subchapter 9 requirements for waste oil. If the generator accumulates >1001 gal of waste oil in any given month he MUST be in compliance with ALL generator requirements.

COMMENTS:

_____

_____

_____

_____

_____

SECTION 6.

ABOVE GROUND TANKS

NA

	YES	NO
IS THE FACILITY IN COMPLIANCE WITH THE ABOVE GROUND <90 DAY STORAGE TANK REGULATIONS?	___	___

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.

If the generator stores hazardous waste in an above ground tank for <90 days, the generator FAILED to:

9.3(b)	Have a letter of approval?	___
9.3(b)2	Have overfilling controls?	___
9.3(b)3	Have secondary containment?	___
9.3(b)4	Insure that 99% of the tank can be emptied?	___
9.3(b)5	Empty the tank every 90 days?	___
9.3(b)6	All wastes removed from the tank(s) to authorized facility?	___
9.3(b)8	If part of the tank is below grade, all of the tank cannot be visually inspected.	___
9.3(b)9	The tank is not labeled with the words "HAZARDOUS WASTE".	___

COMMENTS

SECTION 7.

WASTE MANAGEMENT

	YES	NO
IS THE FACILITY IN COMPLIANCE WITH THE WASTE MANAGEMENT REGULATIONS?	/	

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.

12.1(a)	Generator IS ACTING as a TSDF by:	
	1. Treating hazardous waste.	
	2. Storing hazardous waste.	
	3. Disposing of hazardous waste on site?	
9.3(a)1	The generator FAILS to ship hazardous waste off site within 90 days.	
9.2(a)2	Hazardous waste IS handled in a manner which causes or may cause a spill.	
N.J.S.A.	58:10-23.11(c)	
	Discharge of a hazardous substance.	
N.J.S.A.	58:10-23.11(e)	
	Failure to report the discharge.	

IF THE FACILITY IS ACTING AS A TSDF, COMPLETE THE TSD REPORT.

COMMENTS:

SECTION B.

GENERATOR MANIFESTS

		YES	NO
IS THE FACILITY IN COMPLIANCE WITH THE GENERATOR MANIFEST REGULATIONS?		✓	
IF NO, CHECK THE ITEMS OF NON COMPLIANCE			
7.4(a)3	Generator FAILED to prepare a Hazardous Waste Manifest.		
7.4(a)4	Each manifest failed to have the following information:		
7.4(a)4i	Generator's name, mailing address (site address if different), and phone number.		
7.4(a)4ii	The generator's EPA ID number.		
7.4(a)4iii	The transporter(s) name, phone number, NJ registration and decal numbers.		
7.4(a)4iv	The transporter(s) EPA ID number.		
7.4(a)4v	The name, address and phone number of the designated TSD facility.		
7.4(a)4vi	The TSDF's EPA ID number.		
7.4(a)4vii	The proper USDOT description.		
	OR		
	Complete NOS information in item J.		
7.4(a)4viii	Special handling instructions.		
7.4(a)5i	The generator signature.		
7.4(a)5ii	Transporter's signature & date.		
7.4(a)5iii	Generator FAILED to retain copy and forward copies to the state of origin & state of destination.		
7.4(a)5v	Generator FAILED to give the remaining copies to hauler.		

7.4(e)2	Generator FAILED to use a registered Transporter.	_____
7.4(e)3	Generator FAILED to designate an authorized TSD or reuse facility.	_____
7.4(e)4	Generator FAILED to utilize an authorized TSD.	_____
7.4(f)	Generator FAILED to maintain the following facility records for three (3) years:	
7.4(f)1	Manifests.	_____
7.4(f)2	Annual and/or exception reports.	_____
7.4(f)3	Generator FAILED to maintain records during the course of unresolved enforcement action or as requested.	_____
7.4(h)1	When the generator has FAILED to receive signed copies of all manifests, he FAILED to notify the TSD or Department within 35 days.	_____
7.4(h)2	Generator FAILED to file exception reports within 45 days.	_____

COMMENTS:

_____

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SECTION 9.

HAZARDOUS WASTES EXPORTATION

NA

	YES	NO
IS THE FACILITY IN COMPLIANCE WITH THE EXPORT REQUIREMENTS OF THE REGULATIONS?	___	___

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.

	Generator **FAILED** to:	
7.4(b)	Notify the EPA of its intent to export.	___
	Obtain acknowledgement of consent from the receiving country.	___
7.4(c)	Provide the information required in N.J.A.C. 7:26-7.4 ET. SEQ.to the EPA.	___
7.4(c)7	Insure that the acknowledgement is attached to each manifest.	___
7.4(c)8	Deliver a copy of the Manifest to Customs at the point of departure?	___
7.4(g)4	Submit an annual report to the EPA?	___

COMMENTS:

DFWE 29
REV 02/22/93

SECTION 10.

CONTINGENCY PLAN AND EMERGENCY PROCEDURES

		YES	NO
IS THE FACILITY IN COMPLIANCE WITH THE CONTINGENCY PLAN & EMERGENCY PROCEEDURES REGULATIONS?			
IF NO, CHECK THE ITEMS OF NON COMPLIANCE.			
9.7(a)	NO written contingency plan.		
9.7(b)	Generator FAILED to implement the plan in an emergency.		
9.7(c)	Plan FAILED to describe the response actions facility personnel and local authorities shall take.		
9.7(d)	Generator has a DPCC or SPCC plan, and FAILED to amend that plan to incorporate hazardous waste management.		
9.7(e)	Plan FAILS to describe arrangements agreed to by local authorities.		
9.7(f)	Plan FAILS to list names, addresses, and phone numbers (office and home) of emergency coordinators.		
9.7(g)	Plan FAILS to include a list, location, AND CAPABILITIES of all emergency equipment.		
9.7(h)	Plan FAILS to describe evacuation procedures, evacuation signal(s) AND routes.		
9.7(i)	Generator FAILED to:		
	1. Keep a copy of the plan at the facility.		
	2. Submit the contingency plan to local authorities.		

9.7(j) Generator FAILED to revise the contingency plan when:

1. Applicable regulations are revised. _____
2. The plan fails. _____
3. The facility changes. _____
4. The Emergency Coordinator changes. _____
5. The emergency equipment changes. _____

9.7(k) Emergency coordinator NOT available. _____

COMMENTS

_____

SECTION 11.

PERSONNEL TRAINING

		YES / NO
	IS THE FACILITY IN COMPLIANCE WITH THE PERSONNEL TRAINING REGULATIONS?	
	IF NO, CHECK THE ITEMS OF NON COMPLIANCE.	
9.4(g)2	Training program **NOT** directed by a person trained in hazardous waste management procedures and, is it **NOT** designed to ensure that facility personnel are able to respond effectively.	
9.4(g)3	Program **FAILS** to include the following response procedures:	
9.4(g)3i	Use of personnel safety equipment.	
9.4(g)3ii	Procedures for using facility emergency and monitoring equipment.	
9.4(g)3iii	Key parameters for automatic waste feed cut-off systems.	
9.4(g)3iv	Procedures for utilizing communications or alarm systems.	
9.4(g)3v	Respondse procedures for fires & explosions.	
9.4(g)3vi	Ground water contamination responds procedures.	
9.4(g)3vii	Shutdown procedures.	
9.4(g)4	Personnel **have NOT** successfully completed training within six months of the date of their employment or assignment to a new position at the facility..	
9.4(g)5	Personnel do **NOT** take part in an annual review of training.	
9.4(g)6	**NO** written documentation of the following:	
9.4(g)6i	Job title for each position and the name of the employee filling each job.	

94(9)6ii	A written job description.	_____
9.4(g)6iii	Description of the training given to personnel.	_____
9.4(g)6iv	Documentation of actual training.	_____
9.4(g)7	Training records are **NOT** kept.	_____
9.4(g)8	Semi-annual drills, involving all employees and local authorities are **NOT** conducted.	_____

AND,

9.4(g)8i	Generator **FAILED** to petition the Department for an exemption from the drill requirement.	_____

OR

9.4(g)8ii	Generator FAILED to petition the Department for an exemption excluding local officials.	_____

COMMENTS

_____

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_____

SECTION 12.

PREPAREDNESS AND PREVENTION

	YES	NO
IS THE FACILITY IN COMPLIANCE WITH THE PREPAREDNESS & PREVENTION REGULATIONS?	✓	

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.

9.6(b)	Facility FAILS to have:	
9.6(b)1	Communications or alarm system.	_____
9.6(b)2	A telephone or device to summon emergency assistance.	_____
9.6(b)3	Portable emergency equipment.	_____
9.6(b)4	Adequate Water supply.	_____
9.6(c)	Generator FAILED to test and maintain emergency equipment.	_____
9.6(f)	Generator FAILED to:	
9.6(f)1	Familiarize Police, fire departments, and emergency response teams with the layout of the facility, & hazardous waste handled.	_____
9.6(f)2	Have an agreement designating primary emergency authority to a specific police and fire department where more than one Police and fire department are involved.	_____
9.6(f)3	Make agreements with emergency response contractors, and equipment supplier.	_____
9.6(f)4	Make arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries result from fires, explosions, or discharges at the facility.	_____
9.6(f)5	Make arrangements with local fire departments to inspect the facility on a regular basis with at least two (2) inspections annually.	_____

9.6(f)6 Document when authorities identified in (f)1 through 5 above declined to enter into such arrangements.

COMMENTS:

SECTION 13.

WASTE WATER TREATMENT PLANT SLUDGE

FACILITY Allied Signal

EPA ID. No. NJD078714433 FILE No. 02-62-04

DOES THE FACILITY OPERATE A SLUDGE DRYING UNIT? NO

IF YES, OBTAIN THE FOLLOWING INFORMATION:

1. "WASTE WATER TREATMENT UNIT" QUALIFICATION PER 7:14A-4.3

Is the drying unit part of a waste water treatment facility which is subject to regulation under sections 402 or 307(b) of the federal Clean Water Act? _____

Note: In order to be considered "part of" the facility, the dryer need not be physically connected to the W.W.T. Facility, but must be located at the same site.

Describe the relationship between the dryer and the W.W.T.Facility.

_____

_____

_____

_____

_____

Describe how the sludge is moved from the W.W.T.Facility to the dryer.

_____

_____

_____

_____

_____

Does the drying unit treat a sludge which is generated on-site by the wastewater treatment facility? _____

DFWI 29
REV 02/22/93

Is the sludge to be treated a regulated hazardous waste as defined at N.J.A.C. 7:26-8? _____

If yes, what is the waste classification code? _____

Does the drying unit meet the definition of a "tank" at N.J.A.C. 7:14A-4.3? _____

Note: "Tank" means a stationary device designed to contain an accumulation of hazardous waste and constructed of non-earthen materials which provide the structural strength to totally contain the waste. Dryers that are integrally equipped with feed or discharge hoppers for treatment of sludge in bulk satisfy the definition of "tank". Others not so designed may still be considered tanks on a case-by-case basis.

Provide a physical description of the drying unit.

_____

_____

_____

_____

_____

2. PRIMARY PURPOSE RESTRICTION

Is the primary purpose of the dryer to dehydrate sludge, AND NOT to destroy sludge in order to produce an ash residue. _____

3. THERMAL INPUT LIMITATION

What is the dryer's maximum volume of sludge that the drying unit can hold? _____

What is the heating capacity of the drying unit in kilowatts or BTU/minute? _____

What is the maximum drying time? _____

What is unit weight of the sludge (lbs/cuft)? _____

THIS INFORMATION SHOULD BE SUBMITTED BY THE INSPECTOR TO BHWE FOR A PERMIT EXEMPTION DETERMINATION.

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. General Information

Facility Name: Allied Signal Aerospace (Bendix)

U.S. EPA ID#: NJD078714433 SIC Code:

Street: Route 46

City: Teterboro State: NJ Zip: 07608

Telephone #: 201-288-2000 Telefax #:

Inspection Date: 3/30/94 Time:

	Name	Agency/Title	Telephone #
Inspectors:	McQuiggan	NJDEPE	201-669-3900
Facility Reps*:	Steward	Allied	201-288-2000
	Hooper	"	"

* - Primary Environmental Contacts

See Appendix B to determine which of the following LDR waste categories the facility manages:

	Generate	Transport	Treat	Store	Dispose
F001-F005	X				
F020-F023 & F026-F028					
California List					
First Third					
Second Third					
Third Third	X				

WJK/NJDEPE/(4/93)

INSPECTION SUMMARY

Processes that Generate LDR Wastes:

LDR Waste Management:

Summary of Potential LDR Violations:

Inspector Name and Title: _____

Signature: _____

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. Waste Code Determination

1. Have all wastes been correctly identified for purposes of compliance with 40 CFR Part 268?

   Yes ✓ No____

   If no, list below:

Assigned Classification	Correct Classification

   Comments:

2. Have both the listed and characteristic waste code been assigned, where a listed waste exhibits a characteristic? (40 CFR 268.9(a))

   Yes ✓ No____ NA____

   Comments:

3. Has multi-source leachate been assigned the F039 waste code [40 CFR 261.31]?

   Yes____ No____ NA ✓

   If yes, was single-source leachate combined to form multi-source leachate [55 FR22623]?

   Yes____ No____

   Comments:

II. GENERATOR REQUIREMENTS

A. Treatability Group/Treatment Standard Identification

1. F001-F005 Spent Solvent Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard (* wastewater vs. non-wastewater) for each F-solvent?

   Yes ✓ No____ NA____

   If No, list below:

Waste Code	Assigned Classification	Correct Classification

   Comments:

* < 1% by weight total organic carbon (TOC), < 1% by weight total F001-F005 solvent constituents listed in 40 C.F.R. Table CCWE [40 C.F.R. 268.2(f)(1)]

2. F020-F023 and F026-F028 Dioxin Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard (* wastewater vs. non-wastewater) for each dioxin waste?

Yes____ No____ NA✓

If no, list below:

Waste Code	Assigned Classification	Correct Classification

Comments:_____

* < 1% TOC by weight and < 1% total suspended solids (TSS) by weight [40 C.F.R. 268.2(f)]

3. First, Second, and Third Third Wastes:

a. Does the generator correctly determine the appropriate treatability group/treatment standard for each waste (i.e. subcategory and *wastewater vs. non-wastewater)?

Yes✓ No____ NA____

If no, list below:

Waste Code	Assigned Subcategory	Correct Subcategory	Assigned wastewater vs. nonwastewater designation	Correct wastewater vs. nonwastewater designation

* < 1% TOC by weight and < 1% TSS with the following exceptions: K011, K013, and K014 wastewaters - less than 5% by weight TOC and less than 1% by weight TSS; K103 and K104 wastewaters - less than 4% by weight TOC and less than 1% by weight TSS. [40 C.F.R. 268.2(f)(2) and (3)]

Comments:_____

b. Do the assigned treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? [40 CFR 268.9(b)]

Yes✓ No____ NA____

c. Does the generator specify alternative treatment standards for lab packs?

Yes✓ No____ NA____

If yes, do lab packs only contain the following wastes* ? [40 CFR 268.42(c)(2)]

___✓___ Organometallics: 40 Part 268, Appendix IV constituents
___✓___ Organics: 40 Part 268, Appendix V constituents

* Unregulated wastes and hazardous wastes which meet treatment standards may be commingled in the appropriate Appendix IV and V lab pack. [55 FR 22629]

d. Does the generator specify alternative treatment standards for F039 multi-source leachate?

Yes____ No____ NA___✓___

4. California List Wastes: Has the generator correctly identified the treatability group and treatment standard/prohibition level for the following wastes [55 FR 22675] ?

a. Liquid hazardous wastes containing PCB's ≥ 50 ppm

Yes___✓___ No____ NA____

If yes, check the appropriate treatability group:

___✓___ 50 to 500 ppm PCB's

____ ≥ 500 ppm PCB's

b. Listed or characteristic wastes containing ≥ 1,000 mg/l (liquids) or mg/kg (non-liquids) HOC's, which are not listed or characterized by the HOC content.

Yes____ No____ NA___✓___

If yes, check the appropriate treatability group:

____ Dilute HOC wastewater (1,000 mg/l-10,000mg/l HOCs)

____ All other HOC's greater than or equal to the prohibition level of 1,000 mg/l (liquids) or mg/kg (non liquids)

c. Liquid hazardous wastes that exhibit a characteristic and also contain ≥ 134 mg/l nickel and/or ≥ 130 mg/l thallium.

Yes____ No____ NA___✓___

5. Treatment standards expressed as required technologies: Has the generator specified an alternative method to that required in 40 CFR 268.42?

Yes____ No____ NA___✓___

If yes, list the waste code, the technology specified in 40 CFR 268.42, the alternative method and documentation of approval [40 CFR 268.42(b)].

Waste Code	Required Technology	Alternative Method	Approval

Comments: _____

6. Does the generator mix restricted wastes with different treatment standards for a constituent of concern?

Yes ____ No ✓

If yes, did the generator select the most stringent treatment standards? [40 CFR 268.41(b) and 268.43(b)]

Yes ____ No ____

Comments: _____

B. Waste Analysis

1. Does the generator determine whether restricted wastes exceed treatment standards/prohibition levels at the point of generation? [268.7(a)]

Yes ✓ No ____

If no, does the generator ship all restricted wastes as not meeting treatment standards?

Yes ____ No ____

Comments: _____

2. Which of the following analytical methods does the generator employ?

a. Knowledge of waste:

Yes ✓ No ____

If yes, list the wastes for which applied knowledge was used and describe the basis of determination. Attach documentation. [40 CFR 268.7(a)(5)]

_____

_____

b. TCLP: Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using TCLP? (BDAT=stabilization/immobilization technology) Examples: D004-D011, and F001-F009, etc.

Yes ✓ No ____ NA ____

If yes, list the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach sample of typical test results [40 CFR 268.7(a)(5)].

_____

_____

c. Total constituent analysis: Are wastes with treatment standards specified in 268.43 analyzed using total constituent analysis? (BDAT=destruction/removal technology) Examples: D001-D003, majority of P and U wastes, etc.

Yes ____ No ____ NA ✓

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach sample of typical test results [40 CFR 268.7(a)(5)].

_____

_____

d. PFLT* : Was PFLT used to determine if California List constituents were contained in *liquid* hazardous waste?

Yes_____ No_____ NA___✓___

* PFLT = Paint Filter Liquids Test [Test Method 9095, EPA Publication No. SW-846]

If yes, list the wastes for which PFLT was used and provide the date of last test, the frequency of testing, and note any problems. Attach sample of typical test results. [40 C.F.R. 268.7(a)(5)]

_____

_____

3. Does the generator treat restricted wastes in < 90 day tanks or containers regulated under 40 CFR 262.34? (Examples: elementary neutralization, etc)

Yes_____ No___✓___ (If No, go to 4)

Does the generator treat the wastes to meet appropriate treatment standards/prohibition levels?

Yes_____ No_____

If yes, has the generator prepared a waste analysis plan detailing the frequency of testing to be conducted? [40 CFR 268.7(a)(4)]

Yes_____ No_____ (If No, go to 4)

Does the plan fulfill the following? [40 CFR 268.7(a)(4)(i)]

_____ Based on a detailed chemical and physical analysis of a representative sample.

_____ Contains information necessary to treat the wastes in accordance with 40 CFR Part 268 requirements.

Has the plan been filed with the Regional Administrator (Receipt required for verification)? [40 CFR 268.7(a)(4)(ii)]

Yes_____ No_____

Comments:_____

4. Dilution Prohibition [40 CFR 268.3]:

a. Does the generator mix prohibited* wastes with different treatment standards?

Yes_____ No___✓___ (If No, go to b)

List the wastes: _____

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes_____ No_____

* Prohibited wastes must be treated to established treatment standard prior to land disposal.

Comments: _____

b. Does the generator dilute prohibited wastes to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes_____ No_✓_ (If No, go to c)

Check appropriate category:

_____ Dilutes to meet treatment standards

_____ Dilutes to render waste non-hazardous

Do the wastes fall into the following categories? [40 CFR 268.3(b)]

_____ Managed in treatment systems regulated under the Clean Water Act

_____ Non-Toxic* characteristic wastes

_____ Treatment standard specified in 40 CFR 268.41 or 268.43

* Non-toxic = D001 (except high TOC nonwastewaters), D002, and D003 (except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted:

_____

c. Based on an assessment of points a. and b. and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes_____ No_✓_

Comments: _____

5. F039 Multi-source leachate: Has the generator run an initial analysis for all constituents of concern in 40 CFR 268.41 and 268.43? [55 FR 22620]

Yes_____ No_____ NA_✓_

C. Management

1. On-Site Management

a. Are restricted wastes treated (other than in a RCRA exempt unit), stored for greater than 90 days, or disposed on site?

Yes_____ No_✓_ (If yes, complete TSD Checklist)

Comments: _____

b. If the generator treats characteristic wastes in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to a NJPDES permit are not prohibited (if applicable)? [55FR 22662]

Yes____ No____ NA✓

c. If the generator treats characteristic wastes in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR 268 treatment standards are met*? [40 CFR 268.9(d)]

Yes____ No____ NA✓

* This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 C.F.R. 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

2. Off Site Management: Waste Exceeds Treatment Standards

a. Does the generator ship any waste that exceeds treatment standards/prohibition levels to an off-site treatment or storage facility?

Yes✓ No____ (If No, go to 3)

Does the generator provide a notification to the treatment or storage facility? [40 CFR 268.7(a)(1)]

Yes✓ No____ (If No, go to 3)

If the generator specifies alterrative treatment standards for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes____ No____ NA____

b. Is a notification sent with each waste shipment?

Yes____ No✓ ← 4 manifests missing LDR

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) [SQG only]* ?

Yes____ No____ (If No, go to 3)

* Small quantity generator = generator of greater than or equal to 100 kg/month but less than 1,000 kg/month hazardous waste, or less than 1 kg/month of acutely hazardous waste. (NJ criteria = <100 kg/month of hazardous waste or <1 kg/month of acutely hazardous waste)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler	Waste Code	Subsequent Handler

Did the SQG provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement [40 CFR 268.7(a)(9)]?

Yes_____ No_____

3. Off-Site Management: Waste Meets Treatment Standards

a. Does the generator ship waste that meets treatment standards/prohibition levels to an off-site disposal facility?

Yes_____ No_____ (If No, go to 4)

Identify waste code(s) and off-site disposal facilities:

Waste Code	Receiving Facility
_____	_____
_____	_____

Note: Include documentation supporting the generator's determination that the waste meets applicable treatment standards/prohibition levels.

Does the generator provide a notification and certification to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]

Yes_____ No_____ (If No, go to D)

b. Are a notification and certification sent with each waste shipment?

Yes_____ No_____

If no, is the waste subject to a tolling agreement pursuant to 262.20(e)? (SQG only)

Yes_____ No_____ (If No, go to c)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler	Waste Code	Subsequent Handler
_____	_____	_____	_____

Did the SQG provide a notification and certification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes_____ No_____

c. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes_____ No_____ NA_____ (If No or NA, go to 4)

Complete the following table:

Waste Code	Receiving Facility	Waste Code	Receiving Facility
_____	_____	_____	_____

Are a notification and certification for each shipment sent to the Regional Administrator or authorized State? (40 CFR 268.9(d)(1) and 268.7(b)(5))

Yes_____ No_____

4. Records Retention

Does the generator retain on site copies of all notifications, certifications, and other relevant documents for a period of 5 years? (40 CFR 268.7(a)(6))

Yes_____ No_____ * no LDR for 4 manifests

Are copies of relevant tolling agreements, along with the LDR notification and/or certification, kept on site for at least 3 years after expiration or termination of the agreement? (40 CFR 268.9)

Yes_____ No_____ NA_____

Do LDR documents reflect proper management of wastes previously covere under case by case extensions?

Yes_____ No_____ NA_____

Comments:_____

D. Treatment Using RCRA 40 CFR Parts 264 and 265 Exempt Units or Processes

1. Are restricted wastes treated in RCRA exempt units (distillation unit wastewater treatment tanks, elementary neutralization, etc.)?

Yes_____ No_____ (If No, do not complete this section)

List types of waste treatment units and processes:

Waste Code	Type of Treatment	Treatment units and proces

2. Are treatment residuals generated from these units?

Yes_____ No_____

Comments:_____

3. Are residuals further treated, stored for greater than 90 days, or disposed on site?

Yes_____ No_____ NA_____

(If yes, the TSD checklist must be completed)

Waste Minimization Checklist

GENERATOR CHECKLIST

MANIFEST

GENERAL 262.20

	YES	NO	N/A
Does the generator, offer for tranportation, hazardous waste for off-site treatment/disposal? If yes, proceed to next question. If no, proceed to 264.75/265.75.	/		
262.23			
Does the generator sign the manifest certification which states:	/		
" If I am a large quantity generator, I have a program in place to reduce the volume and toxicity of the waste generated to the degree I have determined to be economically practical and that I have selected the practical method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the enviroment; OR, if I am a small quantity generator, I have made a good effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford."			
Does the generator have a written Waste Minimization Plan?		/	
If no, is the generator able to describe his plan orally.	* /		

COMMENTS:
(Explain in this space the areas that visually show evidence that a program is in place and is being implemented)

* Plant is phasing out large portions of their operations, hence waste generation is decreasing dramatically.

ANNUAL/BIENNIAL REPORT

262.41	YES	NO	N/A
- Has the generator submitted Annual (AR) or Biennial reports (BER) to the appropiate regulatory agency?	/		

The inspector should review these reports prior to the inspection (see above), and should try to verify the information in the report during his/her site inspection. The following questions should be addressed during the inspection.

262.56(a)(5)			
Does the BER or AR include the efforts undertaken during the year to reduce the volume of toxicity of the wastes generated?	/		
Does the BER or AR include a description of the changes in volume and toxicity of the wastes actually achieved during the year in comparison to previous years?	/		
Do these efforts match the information contained in the generator's written or verbally described waste minimization program.	/		
Is the BER or AR certification signed by the generator or authorized representatives?	/		

Attachment D

SAREX®

PROCESS SYSTEM

(MX-2000 THERMAL PROCESSOR)

SRS®

SEPARATION AND RECOVERY SYSTEMS, INC.

SRS PD-00020-1991

COMMERCIAL PUBLICATION
PROCESS DESCRIPTION AND OPERATION

MX-2000
THERMAL PROCESSOR

SRS TECHNOLOGICAL DOCUMENT
DECEMBER 1991

THIS DOCUMENT IS AN ORIGINAL ISSUE PUBLICATION

PREPARED BY

SEPARATION AND RECOVERY SYSTEMS, INC.

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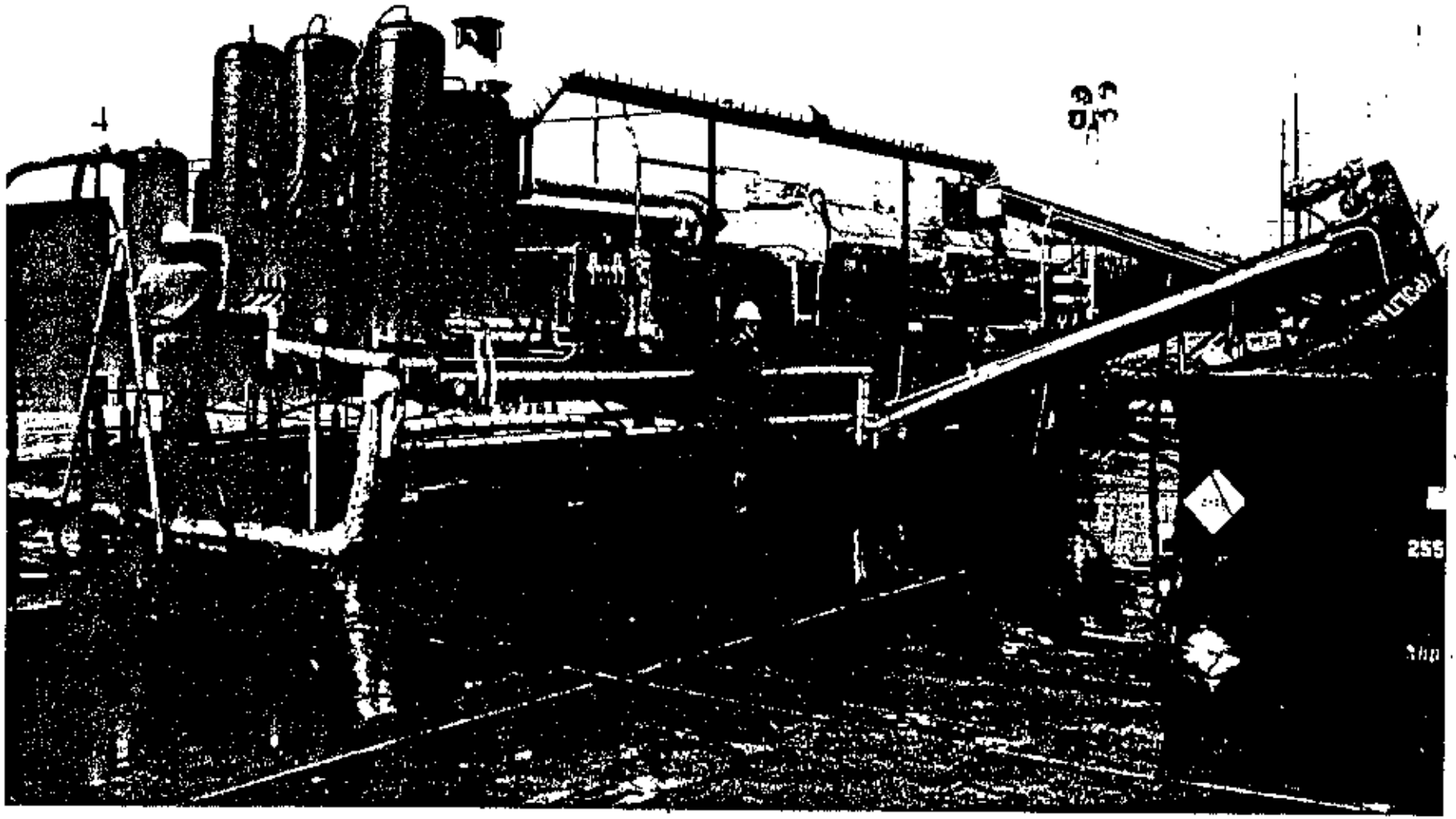


SRS SAREX® MX–2000 THERMAL PROCESSOR

TABLE OF CONTENTS

Paragraph	Title	Page
ABSTRACT		iii
	SECTION I - INTRODUCTION	
1.0	SCOPE OF MANUAL	1-1
2.0	GENERAL DESCRIPTION OF SYSTEM	1-1
3.0	PROCESS BACKGROUND	1-4
	SECTION II - DESCRIPTION AND OPERATION	
4.0	FUNCTIONAL DESCRIPTION	2-1
5.0	OPERATION	2-4
5.1	Waste Minimization	2-4
5.2	Site Remediation	2-7
6.0	OFF-GAS PROCESSING	2-9
	SECTION III - OPERATIONS DATA	
7.0	TYPES OF MATERIALS	3-1
8.0	PROCESSED MATERIALS	3-1
9.0	PERMITTING	3-2
10.0	DEMONSTRATION OF OPERATIONS	3-2
10.1	Example of Site Remediation Data	3-3
11.0	COST OF OPERATIONS	3-3
	SECTION IV - COMPANY PERSPECTIVE	
12.0	LEADING PARTICULARS	4-1
13.0	STATEMENT OF QUALIFICATIONS SUMMARY	4-3
13.1	Company Profile	4-3
13.2	Projects and Installations	4-4

LIST OF ILLUSTRATIONS

Figure	Title	Page
1-1	MX-2000 THERMAL PROCESSOR	1-2
2-1	TYPICAL STEAM CONFIGURATION	2-2
2-2	TYPICAL HOT OIL CONFIGURATION	2-3
2-3	TYPICAL STEAM INSTALLATION	2-5
2-4	TYPICAL HOT OIL INSTALLATION	2-6
2-5	PLOT PLAN - SITE REMEDIATION MODE	2-8
2-6	MX-2000 VAPOR RECOVERY SYSTEM	2-10

LIST OF TABLES

Table	Title	Page
1-1	PROCESS ANALYSIS	1-3
3-1	SITE REMEDIATION PROJECT	3-4
3-2	INCINERATION COSTS	3-5
3-3	TRANSPORTATION AND DISPOSAL COSTS	3-6

SAREX MX-2000 THERMAL PROCESSOR

ABSTRACT

Separation and Recovery Systems, Inc. (SRS) of Irvine, California (SRS), in response to the EPA "Land Ban" requirements (effective November 08, 1990) developed the **SAREX MX-2000 Thermal Processor (MX-2000)** to process hazardous wastes to conform to the EPA's new B.D.A.T. standards. It was designed with a conceptual goal of providing cost-effective, alternative environmental remediation solutions to the hazardous waste problems faced by many of **SRS'** clients. Its design goal is providing a technological treatment service to manage hazardous wastes generated by refining/manufacturing processes and soils contaminated by petroleum distillates or other compounds.

The set of events that led to the development of the **MX-2000** resulted from a study conducted by an **SRS** research team into current thermal desorption technologies. Through research and investigation, a set of design parameters were engineered to address the contamination problems in petroleum industry wastes and other materials. The objective was the introduction of a waste minimization system that met regulatory treatment and discharge standards. The result is a state-of-the-art, environmentally sound, field-proven remediation system.

Volume reduction and waste minimization are the principle methods of remediating/mitigating the environmental problems associated with contaminated residual materials. Volume reduction is achieved by dewatering (drying) of the waste materials; it can be accomplished by a variety of processes. Dewatering separates the liquid phases (oil and water) from the solids. The oil is reclaimed and recovered and the water is sent for pre-treatment and reuse. Waste minimization is accomplished by thermal processing, which desorbs the dewatered solids of its hazardous constituents. The two methods, supplemented by in-situ vapor extraction and treatment, result in the mitigation of the hazardous material and remediation of the accompanying liabilities, while providing the benefits of resource recovery

Since 1987, when the **MX-2000** was first marketed, **SRS** has successfully applied, on numerous occasions, the combination of dewatering and thermal processing to treat waste material containing EPA listed hazardous compounds. Utilizing the low to medium temperature indirect heating (non-contacting) technology of the **MX-2000**, the waste material is desorbed of its hazardous compounds.

The system effectively reduces the concentrations of Volatile Organic Compounds (VOC) and semi-Volatile Organic Compounds (SVOC) in the waste materials to below EPA B.D.A.T. and state agencies standards. The residual solids can then be transported for disposal or treated for additional removal of problem hazardous constituents.

The **SAREX MX-2000 Thermal Processor** is a cost-effective, practical, efficient, mobile processing system that provides for complete on-site treatment of hazardous waste materials. It is practical because it provides on-site processing which minimizes the risks inherent in transportation of hazardous materials, allows flexibility in scheduling, and eliminates the delays often associated with off-site processing. The **MX-2000** is efficient because it allows better disposition of the processed solids and on-site recovery of the reclaimable resources (oil and water). It has proved cost-effective due to reduced transportation times and costs, lower disposal costs and taxes, and efficiency of operation. The **MX-2000** has proved effective and efficient in projects ranging from 600 tons up to 1,200 tons per month.

The **SAREX MX-2000** is an excellent technological example of **SRS'** commitment to providing its clients with the most efficient, cost-effective solutions to their environmental remediation liabilities. The technology employed in the **MX-2000** will assure the clients of compliance with the applicable regulations and standards, while providing the benefits of significant reductions in the costs associated with treatment of their environmental problems. Therefore, interested and qualified clients should contact **SRS** for system particulars.

SECTION I

INTRODUCTION

INTRODUCTION

1.0 SCOPE OF MANUAL

This manual contains a complete description and operation of the **SAREX MX-2000 Thermal Processor (MX-2000)**. It includes general and functional descriptions of the equipment, system development, operations data, and information about **SRS**. Section I contains introductory and general descriptive information, as well as information about the development of the **MX-2000** system. Section II provides a functional description and detailed operational information. Section III contains supplemental operational information, permitting, and cost information. Section IV summarizes SRS' products, services, and qualifications.

2.0 GENERAL DESCRIPTION OF SYSTEM

The **SAREX MX-2000 Thermal Processor** (Figure 1-1) was designed and developed as a thermal desorption and waste minimization system to treat refinery process generated wastes and contaminated problem soils. It is a mobile, trailer or skid-mounted system providing on-site remediation services. It utilizes non-contacting, hollow-screw, thermal treatment technology to desorb the waste materials of the Volatile Organic Compounds (VOC) and Semi-Volatile Organic Compounds (SVOC).

The design of the **MX-2000** provides the necessary controlled environment to treat the waste materials to B.D.A.T. standards (Table 1-1) mandated by the EPA and state environmental agencies. The waste stream enters the unit either by direct feed by a belt or screw conveyor from a sludge dewatering device, or through a feed hopper. The waste material is heated in the processor by indirect heating from the dual-screw and jacket assembly. The treated material exits the processor into a 9-inch, sealed screw conveyor which directs it through a Roto-Lok rotary valve and gravity discharge into approved transport containers.

Vapors generated within the **MX-2000** during waste material processing are recovered by a specially designed SAREX Vapor Recovery System (VRS). The VRS collects the vapors, removes particulate matter, forms condensates, separates the condensates into water and hydrocarbon phases, and polishes the vapors with carbon. The hydrocarbon (oil) phase can be reclaimed and recycled, or transported for disposal. The water phase can be re-used as a coolant, used to reconstitute treated soil, or pumped to a wastewater treatment facility.

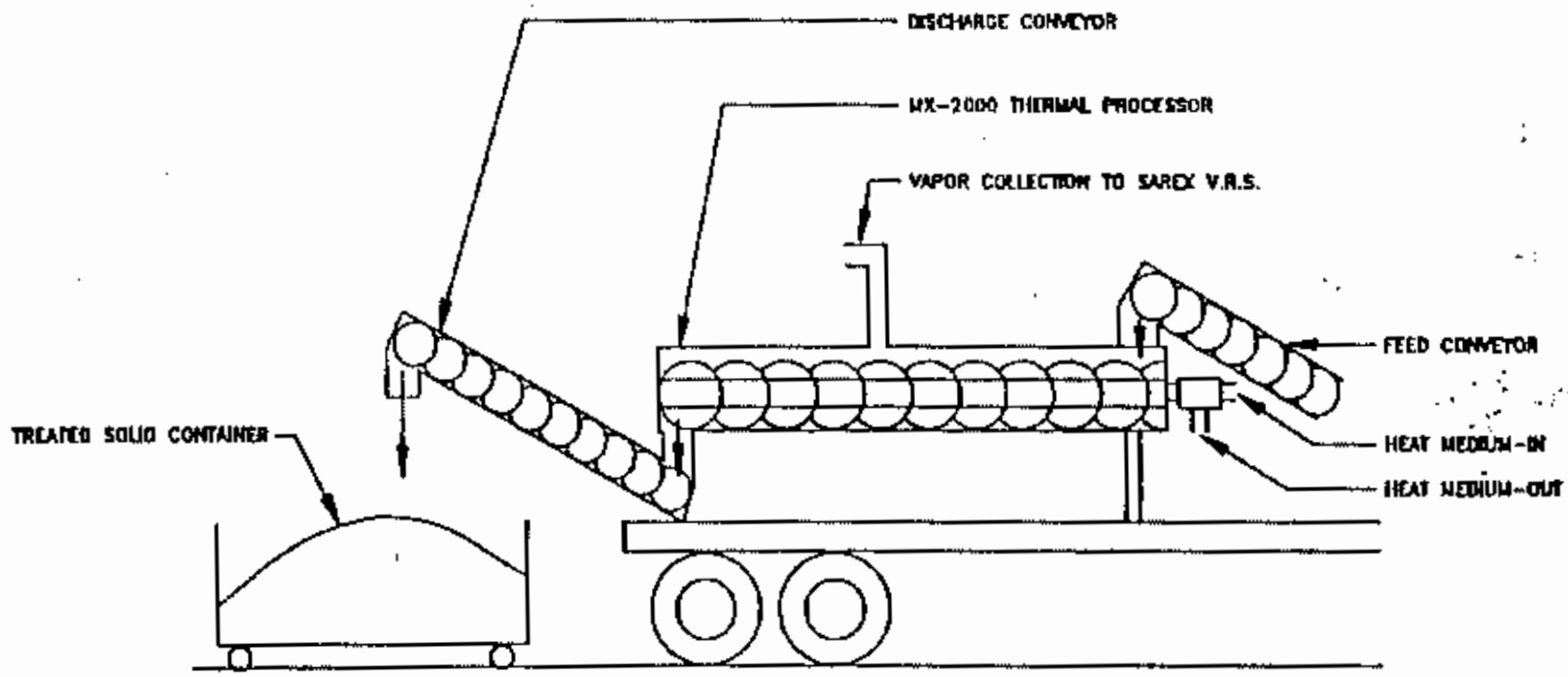


Figure 1-1

SRS SEPARATION & RECOVERY SYSTEMS, INC.

SAREX MX-2000
THERMAL PROCESSOR

PROCESS ANALYSIS
K051 WASTES PROCESSED TO BDAT "LAND BAN" STANDARDS

BASES OF ANALYSIS

- Refinery API sludge K051
- SRS centrifuged solids cake derived from API sludge K051
- Processed solids analyzed at 98% dry weight

CONSTITUENT	LIMIT	RAW FEED	TREATED
	VALUES IN MG/KG		
EPA 8240 TEST			
Benzene	14	35	0.2
Ethylbenzene	14	73	2.1
Toluene	14	140	2.0
Total Xylene Isomers	22	450	17
EPA 8270 TEST			
Anthracene (1)	28	4	<2
Benzo-S Anthracene (J)	20	13	<2
Benzo-A Pyrene (H)	12	No Value	<2
Bis(2-ethylhexyl) Phthalate	7.3	20	<2
Chrysene (E)	15	25	2.4
Di-n-butyl Phthalate	3.6	20	<10
Naphthalene	42	32	7.3
Phenanthrene (D)	34	61	15
Phenol (H)	3.6	20	<2
Pyrene (E)	36	27	<2
Total Cyanides (H)	1.8	0.51	<0.5
TCLP			
Total Chromium (H)	1.7	Not Detect	<0.04
Nickel (H)	0.2	Trace	0.07

TABLE 1 - 1

3.0 PROCESS BACKGROUND

In 1986 at the request of several major oil companies, SRS began developing a technically efficient and cost responsive waste minimization program. The development goal was an effective technology that would result in environmental restoration of contaminated problem soils. A study, which was an extension of ongoing research into thermal desorption technologies currently operating in the commercial market, was undertaken to address the contamination problems in difficult soils and geologic materials. The targeted materials were classified as wet to saturated, fine texture, with low permeability contaminated by variable mixtures of organic and inorganic compounds.

The result of the study was the technology currently employed in the SAREX MX-2000. It was engineered with the design parameters, defined by the developmental goals, which were removal of VOC and most SVOC, and significant reduction of base neutral extractables. The current MX-2000 design produces desorbed solids that conform to the regulatory treatment and discharge standards established by the EPA and state agencies. It has obtained air quality permits from the EPA, and state and local Air Quality Management Districts in California, Kansas, Texas, Louisiana, and New Jersey.

SECTION II

DESCRIPTION AND OPERATION

DESCRIPTION AND OPERATION

4.0 FUNCTIONAL DESCRIPTION

The **SAREX MX-2000 Thermal Processor** (Figure 1-1) is a mobile processing unit designed to remove moisture, as water, VOC, and semi-VOC, from waste materials containing up to 85% moisture. It is a non-contacting system that treats the waste materials by indirect heat processing, which means the source of the heat does not come in contact with the waste material. This process reduces waste material volume and weight, and significantly reduces the concentration levels of VOC and most SVOC. The **MX-2000** consists of the following components:

- Feed conveyor or belt, or five (5) feet^3 feed hopper
- Multiple screw and jacket thermal processor
- 9-inch, sealed screw discharge conveyor
- Roto-Lok rotary discharge valve

The **MX-2000** unit uses a heated rotary, Holo-Flite, multiple screw and jacket assembly to heat the waste as it progresses through the unit. The screw and jacket assembly is heated by a heating medium which is pumped through the hollow shafts of the screws. The heating medium can be steam (Figure 2-1) or an organic heat transfer fluid (Figure 2-2). The organic heat transfer fluid is heated by #2 fuel oil, natural gas, propane, or electricity, whereas the heated steam is piped in from the client's facility. This non-contacting method allows removal of moisture and organic compounds at rates up to 3,000 pounds per hour.

The **MX-2000** operates primarily in two (2) modes: waste minimization and site remediation. During waste minimization the moisture and light hydrocarbons are stripped from the waste, condensed, and separated into water and hydrocarbon phases. During site remediation the hydrocarbons are removed, condensed, and recycled. The remaining solids or soils, usually have TPH levels below regulated standards and can be returned to the site of their excavation.

A SAREX Vapor Recovery System (VRS) is utilized to collect and process the vapors generated by heating of the waste material during system operation. The VRS consists of a pre-cooler, multiple water scrubbers, centrifugal separator, demister columns, positive displacement blower, brine chiller, caustic soda scrubber, and carbon paks. The VRS cools the vapors to

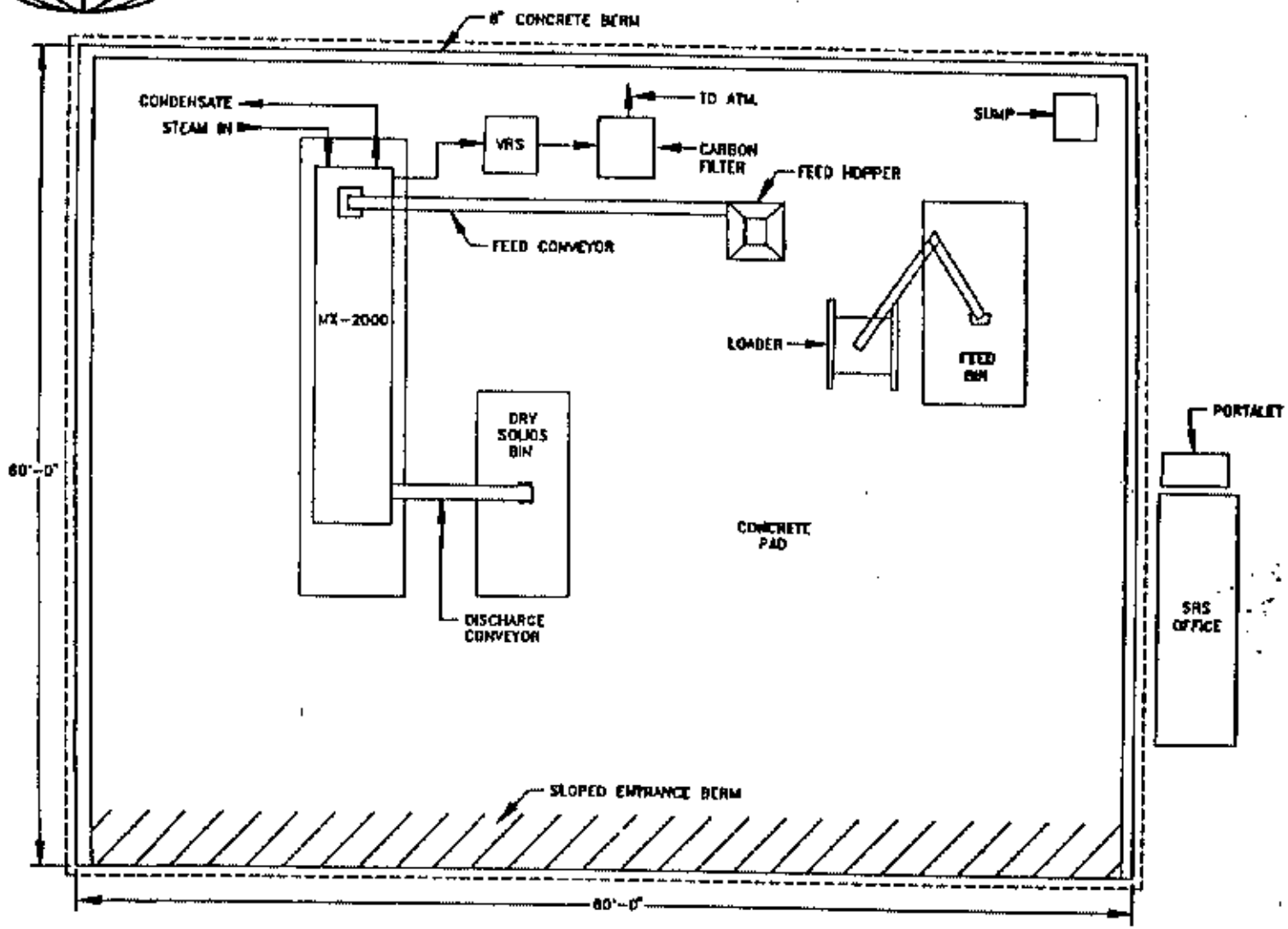


Figure 2 - 1

SRS SEPARATION & RECOVERY SYSTEMS, INC.

SAREX MX-2000
THERMAL PROCESSOR
TYPICAL STEAM CONFIGURATION

SRS Irvine, California U.S.A

SAREX

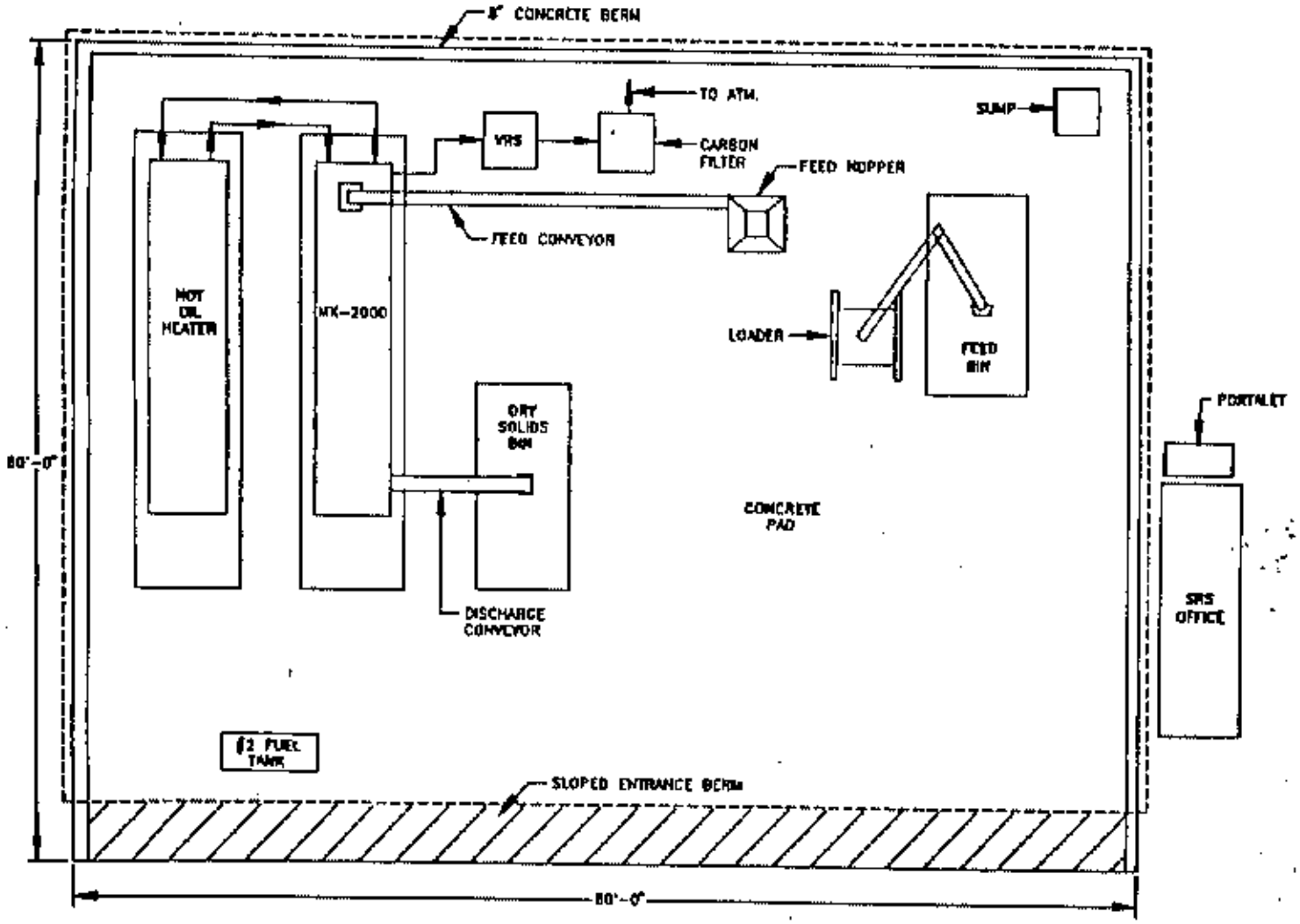


Figure 2 - 2

SRS SEPARATION & RECOVERY SYSTEMS, INC.

SAREX MX-2000
THERMAL PROCESSOR
TYPICAL HOT OIL CONFIGURATION

induce condensation and provide separation of the water and oil phases. The condensates are routed to storage tanks for treatment, recycling, or disposal. The remaining vapors are polished to remove the uncondensed volatiles prior to vapor emission into the atmosphere.

5.0 OPERATION

The **SAREX MX-2000** receives the waste materials by direct feed from a dewatering device via a belt or screw conveyor which deposits the material into a five (5) yard^3 feed hopper. A feed auger at the bottom of the feed hopper meters the waste materials onto the feed conveyor, which advances the waste materials into the processor. The wet, waste materials, as they enter the **MX-2000** processor, are heated up to 280°F using steam (Figure 2-3), or up to 650°F using an organic heat transfer fluid (Figure 2-4). A 7.5 HP vari-drive motor turns the screw assembly at one (1) rpm to move the waste material laterally through the unit. During a residence time of 60 to 90 minutes the waste material has up to 98% of its moisture removed. At this point the VOC and most of the SVOC are desorbed. The dry, processed material discharges from the unit into a 9-inch sealed screw conveyor which passes the material through the Roto-Lok rotary valve (prevents air from entering the system), and into approved transport containers.

Note

> Residence time to meet acceptable "Land Ban" B.D.A.T. discharge standards (Table 1-1) is determined by the characteristics of the waste feed stream. Discharged solids meeting these standards allows the client to dispose of them at secure Class I landfills. This gives the customer substantial cost savings over more costly methods of disposal.

The MX-2000 operates primarily in two (2) modes: waste minimization and site remediation.

5.1 WASTE MINIMIZATION

The waste minimization mode is designed to process both RCRA wastes (K048 - K052) and non-RCRA wastes. Hot oil heated up to 650°F is normally the heat transfer medium. This allows removal of moisture, VOC, and semi-VOC at a throughput rate of up to 3,000 pounds per operating hour. The moisture and organics stripped from the waste material are condensed, separated into phases, and recycled back to the client's facility for recovery or disposal. In some cases *SRS* will provide downstream wastewater treatment to acceptable standards.

SAREX

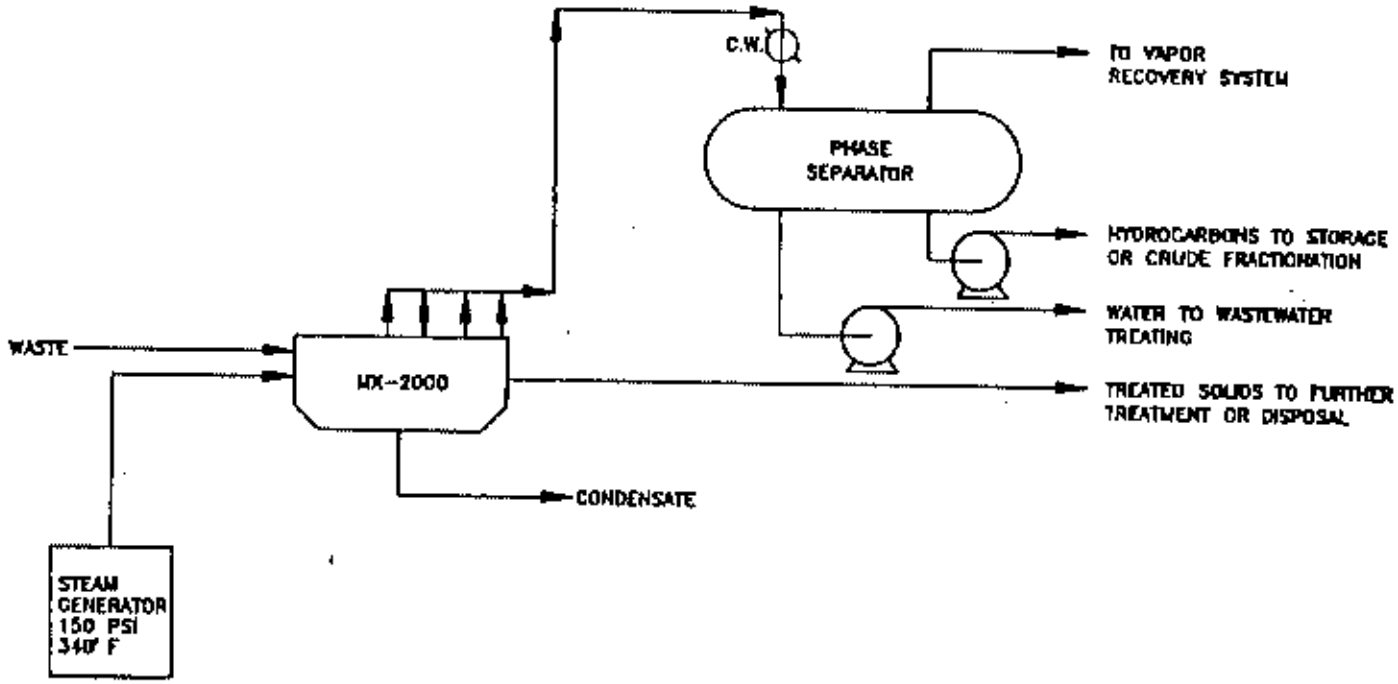


Figure 2 - 3

SRS SEPARATION & RECOVERY SYSTEMS, INC.

SAREX MX-2000
THERMAL PROCESSOR
TYPICAL STEAM INSTALLATION

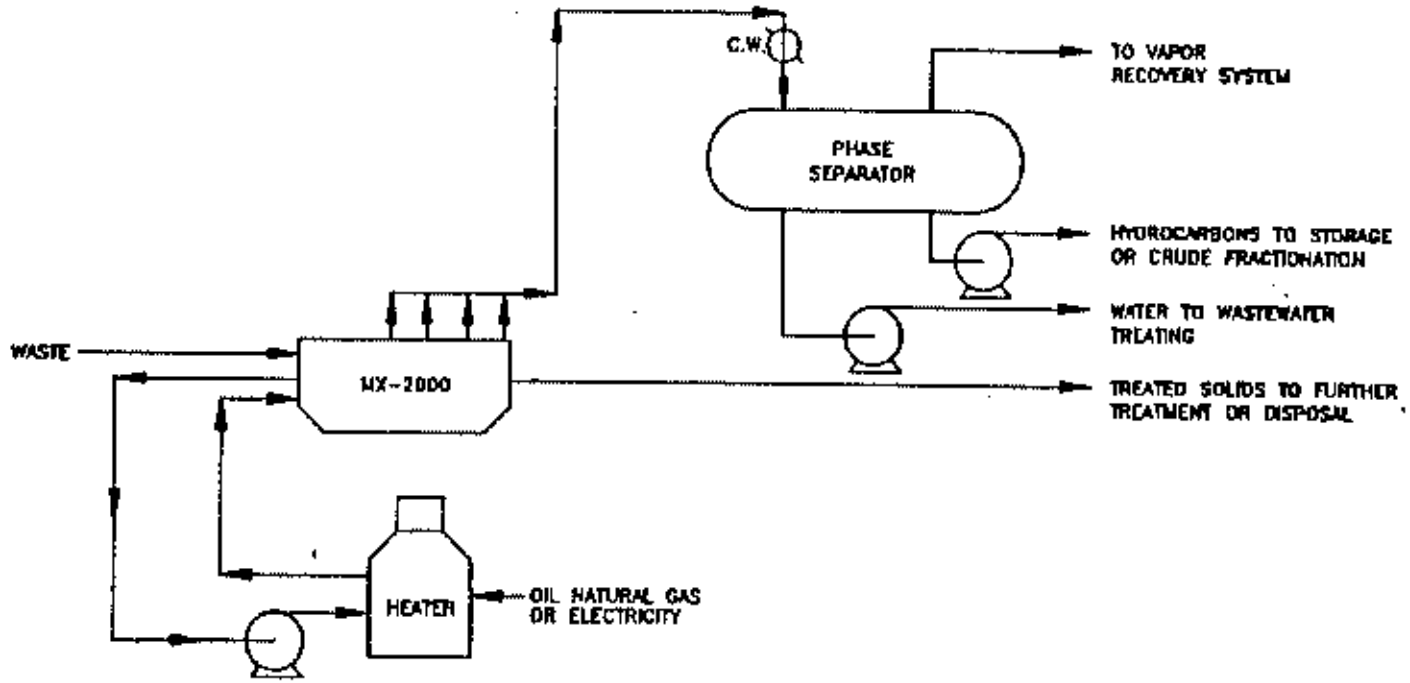


Figure 2 - 4

SRS SEPARATION & RECOVERY SYSTEMS, INC.

SAREX MX-2000
THERMAL PROCESSOR
TYPICAL HOT OIL INSTALLATION

The material balance characteristics of the treated materials exiting the **MX-2000** depend upon the characteristics of the feed waste materials entering the system. These in turn determine the throughput rate, residence time, and processing temperature, which effects the amount of moisture and organics remaining in, as well as the weight and volume of, the treated material requiring disposal.

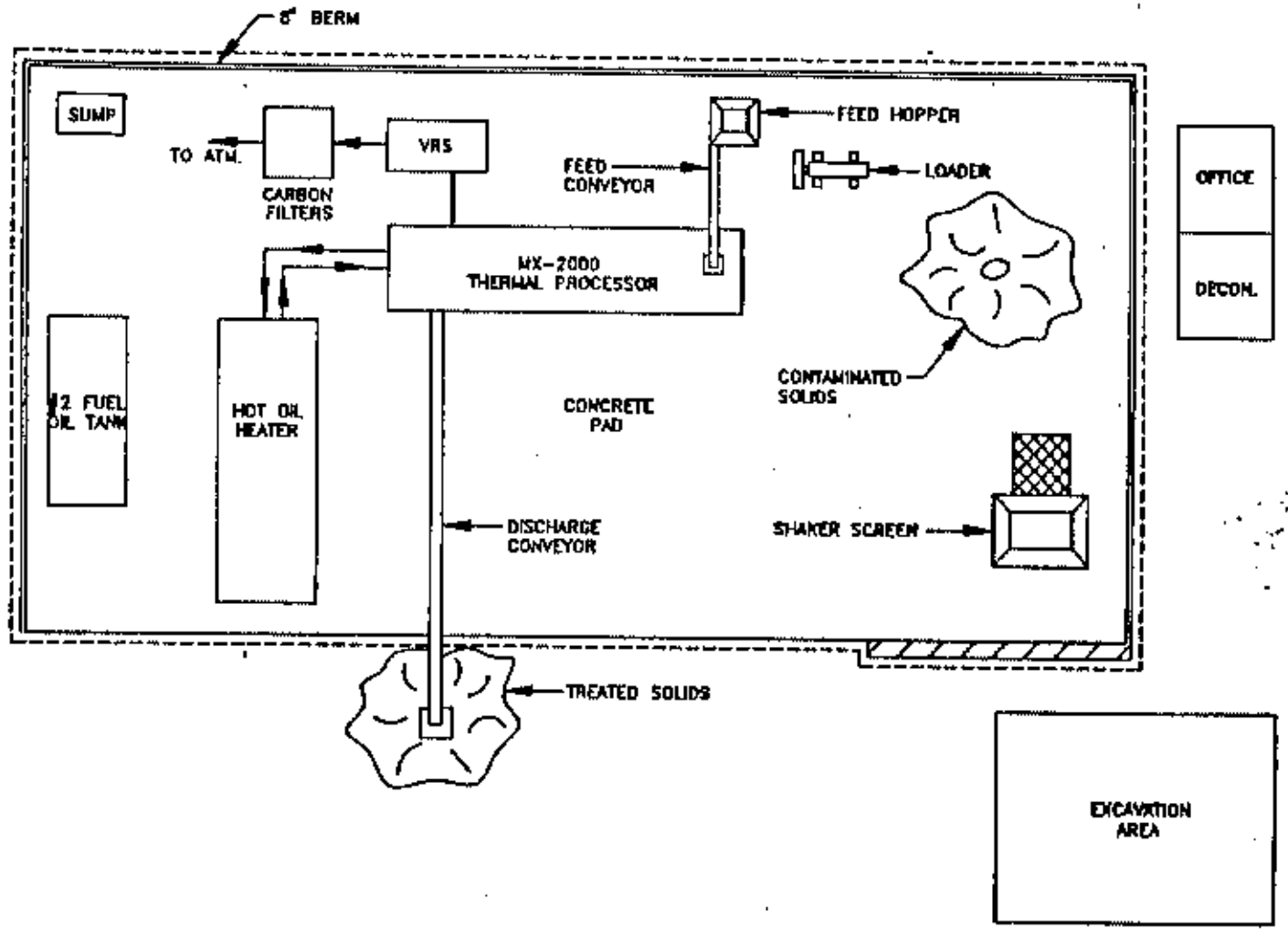
5.2 SITE REMEDIATION

The **MX-2000** is an EPA accepted method of remediating soils at sites contaminated by fuels (gasoline, Jet-A, diesel etc.) or other petroleum based propellants, distillates, or compounds. In the site remediation mode (Figure 2-5) the system is designed to remove hydrocarbon contaminants which can then be condensed and recycled. The treated solids, which normally have TPH levels below regulation standards, can then be returned to their site of excavation in preparation for environmental restoration, if required.

In this configuration the **MX-2000** is normally heated by circulated hot oil at temperatures up to 650°F. The soil for processing has been removed by standard excavation equipment, transported to the processing site, and offloaded for mechanical screening to remove large debris and rocks. The soil is then stockpiled and covered until it can be processed.

The soil is removed from the stockpile by a front end loader which dumps it into the five (5) yard^3 feeder. A feed auger in the bottom of the feeder meters the soil onto the inclined belt conveyor which feeds the soil into the processor. The soil moves laterally through the system at a rate that determines its residence time. During that time the soil is heated from 500°F to 550°F. The treated soil is gravity fed into a discharge auger and conveyed by an inclined belt conveyor for discharge.

The discharge auger is sealed and equipped with water spray nozzles to spray water onto the treated soil. This not only cools the soil, it helps eliminate dust and reconstitutes the soil with the proper percentage of moisture to prepare it for return to its place of excavation. The water used for spraying can be fresh, filtered, or treated condensate from the **MX-2000**.



SRS SEPARATION & RECOVERY SYSTEMS, INC.

SAREX MX-2000
PLOT PLAN
SITE REMEDIATION MODE

Figure 2 - 5

SRS Irvine, California U.S.A.

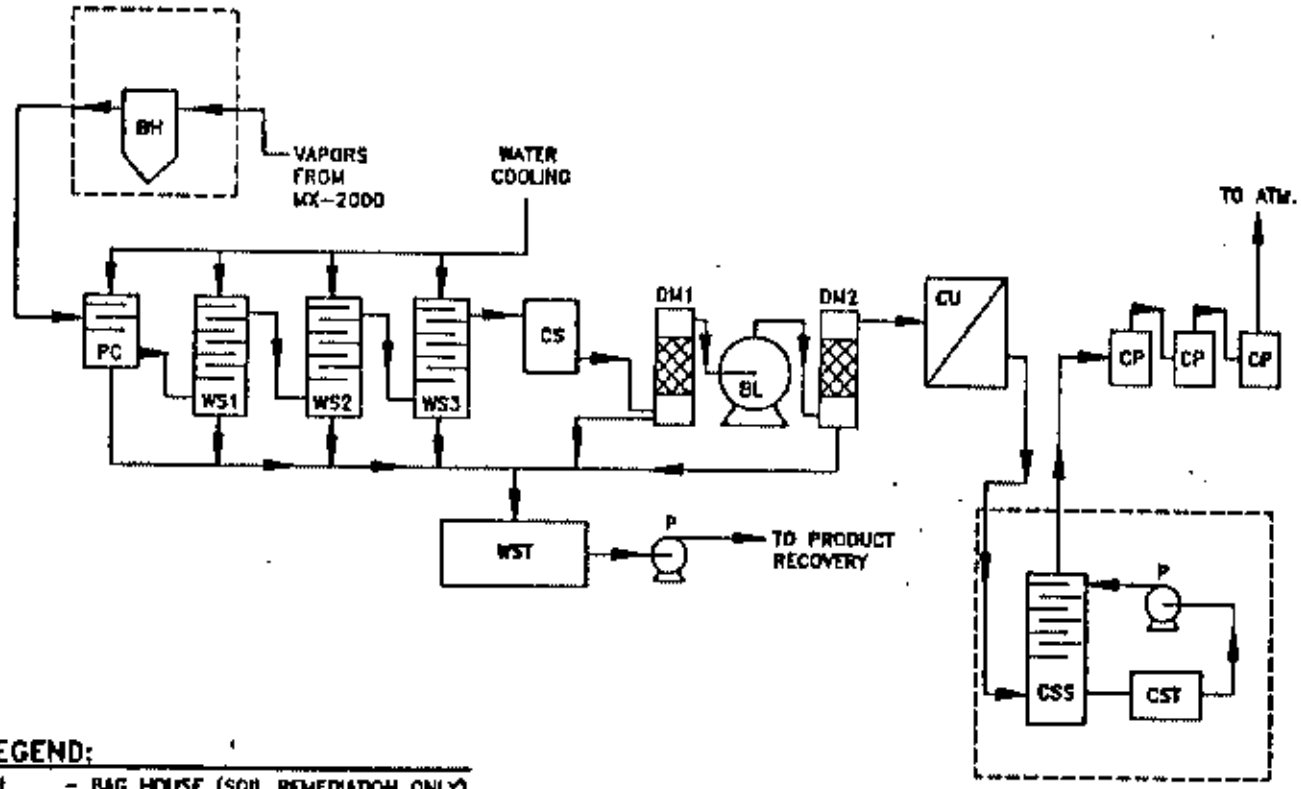
The VRS is used when the MX-2000 is operating in the site remediation mode. The vapors pass through a baghouse, which is only utilized during soil remediation projects, for dust collection. The vapors, after discharge from the baghouse, enter the precooler and the VRS.

6.0 OFF-GAS PROCESSING

Vapors generated during processing in the MX-2000 are collected and treated by a specially designed SAREX Vapor Recovery System (VRS) (Figure 2-6). They are collected in a vapor dome on the discharge end of the processor and drawn by negative pressure through two (2) 6-inch vapor lines into a water-cooled precooler for initial temperature reduction. The negative pressure, created by the VRS' positive displacement blower, draws the vapors through multiple contact water scrubbers in series and a centrifugal separator, which "knocks down" (separates) some of the oil as the vapors are cooled to 120°F. Condensates from the water scrubbers flow into a storage tank, and the remaining vapors pass through a demister column, positive displacement blower, and a second demister column. The condensates discharge into a collection tank.

The uncondensed vapors flow from the demister column to a 37°F brine chilling unit (0° second chilling unit is available) for additional condensation. The condensates flow into a condensate tank and on into a storage tank. If hydrogen sulfide (H_2S) is detected the vapors are treated in a caustic scrubber with continuous caustic circulation. Final vapor stream polishing is accomplished by carbon bed adsorption through two (2) banks of multiple carbon vapor paks. Polished vapors are discharged to the atmosphere through a 4-inch stack.

SAREX



LEGEND:

BH	- BAG HOUSE (SOIL REMEDIATION ONLY)
PC	- PRE COOLER
WS1	- WATER SCRUBBER 1
WS2	- WATER SCRUBBER 2
WS3	- WATER SCRUBBER 3
CS	- CENTRIFUGAL SEPARATOR
DM1,2	- DEMISTER
BL	- BLOWER
CU	- CHILLER UNIT
CP	- CARBON POLISHER
CSS	- CAUSTIC SODA SCRUBBER
CST	- CAUSTIC STORAGE TANK
WST	- WATER STORAGE TANK
P	- PUMP

FIGURE 2 - 6

SRS SEPARATION & RECOVERY SYSTEMS, INC.

SAREX MX-2000
THERMAL PROCESSOR
VAPOR RECOVERY SYSTEM

SECTION III

OPERATIONS DATA

OPERATIONS DATA

7.0 TYPES OF MATERIALS

The **MX-2000** was designed to process a variety of contaminated sludges, soils, and wastes containing high concentrations of hazardous compounds. It is specifically suited for refinery wastes (KO = specific sources/FO = non-specific sources), but can efficiently and completely process other types of waste materials. The waste materials include:

- KO48 - Dissolved air floatation (DAF) float
- KO49 - Slop oil emulsion solids
- KO50 - Heat exchanger bundle cleaning sludge
- KO51 - API separator sludge
- KO52 - Tank bottoms (leaded)
- FO37 - Petroleum refinery primary oil/water/solids separation sludge
- FO38 - Petroleum refinery secondary (emulsified) oil/water/solids separation sludge
- VOC - Volatile organic compounds
- SVOC - Semi-Volatile organic compounds
- Soils contaminated by refinery distillates or other hazardous compounds

8.0 PROCESSED MATERIALS

The **MX-2000** discharged solids will consistently have hazardous constituent concentration levels that are below the EPA's B.D.A.T. standards, which qualifies them for disposal at non-hazardous landfills. When treated by the **MX-2000** and handled, managed, transported, and disposed of by an approved means, they will not pose a present or potential threat to human health or the environment. Nonetheless, the processed material are dried solids which are classified as RCRA solid wastes (40 CFR 261.2). As such, they must be analyzed according to the TC Rule defined in 40 CFR 261.4, Subparts B and C to determine if they are hazardous or non-hazardous. If the TC requirements are satisfied they are considered non-hazardous and may be disposed of in a non-hazardous landfill.

If they fail the TC requirements they are classified as characteristic wastes, and they will be handled by SRS in accordance with all applicable regulations.

9.0 PERMITTING

The MX-2000 can be exempt from permitting by qualifying as a totally enclosed loop recycling system that processes "secondary materials" [40 CFR 261.4 (a) (8)] that contain "recyclable materials" that are not subject to regulation [40 CFR 261.6 (a) (3) (vi)]. These oil-bearing materials are not classified as RCRA solid wastes because the oil can be "...reclaimed and returned to the original process or processes in which they were generated where they are reused in the production process...". Essentially, the MX-2000 processes materials that are not subject to regulation with a system that qualifies for an exclusion. Therefore, SRS can offer the MX-2000 as an exempt method of processing hazardous materials to B.D.A.T. standards, and attain maximum recovery of recyclable resources.

10.0 DEMONSTRATION OF OPERATIONS

The MX-2000 is a self-contained, easily set up, field-proven technology. In the past two years it has treated over 100,000 tons of RCRA and non-RCRA refinery wastes and contaminated soils to specific end-use requirements. It has offered SRS' clients a treatment process that reduces waste volume and disposal tonnage to provide an excellent economy of operation. The MX-2000 is technologically effective and operationally efficient thus assuring the client of obtaining regulatory compliance, which eases their environmental liabilities. It provides for complete processing of wastes that include:

- Moisture removal from refinery sludges to reduce tonnage transported to disposal
- Removal of Volatile Organic Compounds (VOC) and base neutrals from contaminated soils
- Moisture removal from RCRA wastes prior to incineration (weight reduction)
- Processing of organic and inorganic soils
- Biological aeration pond bottoms (dredged sludge) desorption of solids recycling to concrete or asphalt
- Processing of RCRA wastes to B.D.A.T. standards for disposal at Class I permitted facilities

SRS is currently operating six (6) MX-2000 units, processing both RCRA and non-RCRA wastes, at petroleum refineries within the continental U.S.. Four (4) of the units in operation are using plant steam as the heating medium, while the remaining two (2) units are operating in the hot oil configuration.

10.1 EXAMPLE OF SITE REMEDIATION DATA

The data in Table 3-1 represents a recent site remediation project that processed 20,000 yards^3 of soils contaminated by gasoline, Jet-A turbine fuel, and diesel fuel. The project site was a major RCRA remediation project in New Jersey. The level of remediation was established by the New Jersey Department of Environmental Protection (NJDEP) as 500 ppm TPH, 10 ppm base neutral extractables, and 1 ppm VOC.

TPH (EPA Method 418.1) remaining in the treated soil had a maximum of 380 ppm, however, the average TPH was 140 ppm (23 samples), which was well below the NJDEP mandated level. The MX-2000 can reduce TPH to below 100 ppm if required. Base neutral extractables by EPA Method 8270 averaged 3.6 ppm which was also well below the mandated level, as were VOC for all samples.

11.0 COST OF OPERATIONS

The MX-2000 is a cost-effective, competitively priced means for on-site processing of refinery and other wastes and contaminated soils. Its technology and design offers an method of operation that provides important reductions in material weight and volume, thereby incurring substantial cost savings in transportation, processing, and disposal (Tables 3-2 and 3-3). Cost savings can also be realized through use of the client's on-site utilities.

The MX-2000 is cost-effective because it incorporates up-to-date technology that is responsive to the client's needs. Through utilization of excellent design technology, the MX-2000 exhibits superior process efficiency and reliability which results in lower operational costs. This results in processing that provides effective remediation that can lead to complete environmental restoration and the easing of economic liability and responsibility.

The MX-2000 is competitively priced because SRS will typically invoice costs for waste minimization and site remediation projects on a fixed rate per ton. This is achievable because of SRS' significant field operations experience, pre-operational planning, bench testing of the targeted material prior to commencement of operations, and the extensive pro-

SITE REMEDIATION PROJECT
DAYTON, NEW JERSEY
LABORATORY TEST RESULTS MAY 10, 1989

NJDEP Mandated Requirements:

- TPH below 500 ppm
- Base neutral extractables below 10 ppm
- VOC below 1 ppm

NUMBER	SAMPLE	OPERATING TEMP °F	RETENTION TIME	MATERIAL	TPH (PPM)
1	PST - 7 DIESEL			UNTREATED	1900
				TREATED	380
		550	30 MINS		
	RETEST			UNTREATED	3000
				TREATED	270
LABORATORY REQUIREMENTS ONLY					
2	PST - 4 KEROSENE			UNTREATED	6500
				TREATED	270
		540	40 MINS		
3	PST - 1 GASOLINE			UNTREATED	1900
				TREATED	89
		545	40 MINS		
4	MANIFOLD GAS & DIESEL			UNTREATED	1200
				TREATED	<50
		550	40 MINS		
5	PST - 7 DIESEL			UNTREATED	1600
				TREATED	<50
		600	75 MINS		

TABLE 3 - 1

fessional experience of their personnel. Subsequently, many commercial-size projects were completed within budget at costs that are competitive and reasonable.

Typical projects utilizing the **MX-2000** for thermal processing offer the client substantial cost savings over treatment methods such as incineration (Table 3-2). Table 3-3 offers a cost comparison between monthly costs of transportation and disposal of untreated waste materials versus costs of transportation and disposal of waste material thermally treated by the **MX-2000**.

INCINERATION COSTS
NON-THERMAL VS THERMALLY TREATED WASTE MATERIALS

COMPARISON BASES:

- 1,200 tons per month of API/DAF filter cake (50% weight solids)
- Transportation not included
- **MX-2000** treatment cost of $180,000 per month
- $800 per ton for incineration

COST ITEM	TREATMENT PARAMETERS and COSTS	
	NON-THERMAL	THERMAL
Incineration (1,200 Tons)	$960,000	$0.00
Incineration (600 Tons)	$0.00	$480,000
MX-2000 Process	$0.00	$180,000
TOTAL COST	$960,000	$660,000
MX-2000 Savings	$0.00 (0.0%)	$300,000 (31.2%)

TABLE 3 - 2

TRANSPORTATION AND DISPOSAL COSTS
NON-THERMAL VS THERMALLY TREATED WASTE MATERIALS

COMPARISON BASES:

- 1,200 tons per month of API/DAF filter cake
- 73% weight reduction of treated waste material
- 60% volume reduction of treated waste material
- $285.00 per ton for transportation to Class I disposal site

COST ITEM	TREATMENT PARAMETERS and COSTS	
	NON-THERMAL	THERMAL
Standard Transportation and Disposal at Class I site. (1,200 Tons)	$342,000	$0.00
Standard Transportation and Disposal at Class I site. (325 Tons)	$0.00	$92,625
MX-2000 Process	$0.00	$110,000
Total Cost	$342,000	$202,625
MX-2000 Savings	$0.00 (0%)	$139,375 (40.8%)

TABLE 3 - 3

The experience gained from extensive operations experience allows SRS to provide a fixed-rate quote for most projects. The SRS quoted rate will typically include provisions for:

- Cost of labor and supervision for a 12-hour day, six day work week
- All equipment including repair and cleaning
- All materials, chemicals, provisions, and utilities if required

- All transportation of equipment and supplies
- Health and safety monitoring
- Completion report

Typical commercial sized projects involving tens of thousands of yards^3 of raw wastes have been proposed at costs that may depend upon local conditions and the type of material requiring processing. However, to offer a fixed price quote ORS must visit the proposed site and obtain samples of the raw waste for laboratory bench testing.

SECTION IV

COMPANY PERSPECTIVE

COMPANY PERSPECTIVE

12.0 LEADING PARTICULARS

Separation and Recovery Systems, Inc (**SRS**) of Irvine, California is a leading environmental remediation company that develops and manufactures processes and services designed for on-line separation and on-site dewatering and thermal processing of oil\water\solids matrix materials. In 1974 they began developing an efficient method for separating oil and water from solids. This led to the commercial marketing of the **SAREX** line of separators, which filter solids from the oil/water mixture, and then separate the filtrate into oil and water effluents. The current **SRS** inventory of **SAREX** separators includes the **OWS** (oil/water separator), **VGS** (vacuum gravity separators), **FFS** (fuel filter separators), and **LOP** (lube oil purifiers) units. **SRS** also manufactures on-line discharge analyzers that measure the ppm of the oil discharged from the separators. All the separators are coalescing-type units that come in 1, 2, or 3-stage models with capacities ranging from 1 gpm to 1000 gpm.

The **SAREX** oil-water separators have been approved and accepted by the American Bureau of Shipping, U.S. Navy, U.S. Coast Guard, and U.S. Army. Manufactured in various configurations, they are currently operating on approximately 90% of the world's oil tankers. They are internationally approved and accepted by shipping authorities in Australia, Denmark, Finland, Germany, Greece, Holland, Italy, Japan, Norway, Panama, Republic of China, Romania, Russia, Sweden, United Kingdom, and Yugoslavia.

In 1985 **SRS** introduced the **SAREX MX-1500 Mobile Treatment Unit** (**MX-1500**) for dewatering and desludging of oily sludge materials. It is a mobile, trailer-mounted unit designed for on-site waste minimization of sludges or slop oils found in refinery tank bottoms, sumps, pits, impoundments etc. The system separates the material, containing up to 85% BS&W, into three (3) distinct phases of oil, water, and solids. The oil (with less than 2% BS&W) and water can be recycled; the solids contain no free liquids and are compliant with the provisions of the Hazardous Waste Act 40 CFR Parts, 260, 264, 265, and 270 (Paint Filter Test). The **MX-1500**, with a processing capacity of up to 1500 barrels/day, contains supporting utility services and a specially designed **SAREX Vapor Recovery System** (**VRS**) for processing system generated vapors.

The **SAREX MX-1500** has been approved by the EPA (40 CFR Part 264.1), and the State of California Department of Health Services (Section 25143.2). It has received permits from the State of California South Coast and Bay Area Air Quality Management Districts, State of Texas Water Commission, and the State of Louisiana Department of Environmental Quality.

In 1987 SRS introduced the **SAREX MX-2000 Thermal Processor** as a mobile, trailer-mounted, cost-effective technology designed for on-site waste minimization and environmental restoration. It is a non-contacting, thermal desorption system that uses indirect heating to significantly reduce the concentration levels of Volatile Organic Compounds (VOC) and Semi-Volatile Organic Compounds (SVOC) in a variety of sludge materials and problem soils exhibiting a wide range of contaminating characteristics and moisture content levels. A **SAREX Vapor Recovery System (VRS)** may be used with the **MX-2000** to collect and process noxious vapors generated during system operation. The discharge materials and emissions meet established EPA and state regulatory agencies air quality and treatment standards. The **MX-2000** system can remove up to 3,000 pounds of moisture and organics per operating hour.

The **SAREX MX-2000 Thermal Processor** has been approved by the EPA (40 CFR Part 264.1), and the State of California Department of Health Services. It has received permits from the State of California South Coast and Bay Area Air Quality Management Districts, State of Kansas Department of Health and Environment, State of Louisiana Department of Environmental Quality, State of New Jersey Department of Environmental Protection, and the State of Texas Water Commission.

The **SAREX MX-2500 B.D.A.T. Thermal Processor (MX-2500)** is a mobile, trailer-mounted, non-contacting, thermal desorption system designed to reduce the concentration levels of problem SVOC in dewatered, contaminated refinery residual materials or problem soils. The **MX-2500**, which was first marketed in 1991, utilizes medium to high (600°F to 1200°F) temperatures to process the materials to EPA B.D.A.T. standards for disposal at non-hazardous landfills. It consists of a feed hopper connected by a flexible bellows and rotary valve to the thermal processing assembly which employs electrically heated screws to process the material. The material is fed through a bellows into the product cooler (heat exchanger) and discharged through a rotary valve into an approved container. The **MX-2500** can operate as a stand-alone processing unit, in succession with a **MX-2000**, or in series with another **MX-2500**. It can accommodate a **SAREX VRS** to procewss the vapors generated during processing.

The **SAREX Chemical Fixation Process (CFP)** was developed for on-site remediation of refinery sludge materials or contaminated soils. The process utilizes thermal desorption and chemical reactions to stabilize the material's constituents in a chemically neutral (non-toxic) matrix that limits constituent solubility, permeability, and mobility. The **CFP** utilizes a mixture of lime and non-toxic chemicals (reagent blend) to induce chemical reactions with the material's constituents. The process produces a product with a soil-like consistency that can be returned to its place of origin. When compacted (up to 95% of its maximum density) it is an environmentally safer end-form that is isolated from ambient influences, and exhibits superior structural integrity.

The **SAREX CFP** is marketed in either an open or a closed system. The "open" system processing is conducted in open tanks/pits in ambient conditions. All movement, mixing/blending, curing, and storage is done by common, readily available equipment in an open environment. The "closed" system processing is conducted in completely enclosed equipment, which include feed conveyor with reagent silo, rotary-screw homogenizer, thermal processor, and discharge conveyor. Vapors generated during processing are routed to the **VRS**. The discharged solids are returned to the site of excavation.

13.0 STATEMENT OF QUALIFICATIONS SUMMARY

13.1 COMPANY PROFILE

Separation and Recovery Systems, Inc. (SRS) provides innovative, alternative solutions for their client's environmental remediation challenges and compliance liabilities. The solutions **SRS** offers are on the technological leading edge of environmental remediation by applying a thorough knowledge of currently available technologies, and an appreciation of their applicability and economies. Through an in-depth understanding of the entire range of project related activities, **SRS** offers technically efficient, cost-effective products, systems, and processes designed to answer the challenges of an increasingly complex environmental climate.

SRS is committed to meeting their client's needs and requirements by providing the equipment, guidance, and leadership to complete each project within its scope, schedule, and budget. They assess each project's goals and initiate a timely response to the project's demands, which promotes success in attaining those goals. They approach each project in a pragmatic and professional

manner; meeting each challenge with a focus towards possible solutions, the alternatives, and potential impacts. They ensure that each project conforms to the scope of the work to be accomplished, and that its manufactured equipment conforms to the highest standards of performance and reliability. In each project, SRS pays close attention to detail, employs the proper skills and experience, understands the logistics, and utilizes its extensive operations background for successful project completion.

The source of a company's success is its personnel. SRS relies upon the qualifications and experience of its operations, technical, management, and support staff which represents over 75 collective years of environmental experience supported by a variety of educational backgrounds. SRS' personnel provide a resource matrix that has the capability to respond to a client's requirements in a practical and expeditious manner. Their extensive knowledge, expertise, and operations experience ensures that each client will receive the best solution for its set of problems. This begins with an investigation of the problem, definition of the extent of the problem, an analysis to determine possible solutions, and selection of the best solution.

13.2 PROJECTS AND INSTALLATIONS

SRS adapts their resources to accomplishing the specific goals of each project or equipment request. Its products, systems, and processes address a wide spectrum of environmental remediation services. Although each project and equipment installation is unique, they do exhibit many similarities. This allows most of them to be classified under several generic headings that reflect SRS' areas of specialization.

The following list reflects the types of work accepted by SRS. Because each project and installation retains its site-specific nature, the following can not encompass the entire scope of SRS' involvement in the environmental remediation market. Therefore, the list was limited for the sake of brevity.

- Technology demonstrations
- Waste minimization and desorption
- Site remediation and cleanup
- Impoundment closure
- Environmental compliance
- Process equipment manufacturing

State of New Jersey
Department of Environmental Protection and Energy
Division of Responsible Party Site Remediation
CN 028
Trenton, NJ 08625-0028

Jeanne M. Fox
Acting Commissioner

Karl J. Delaney
Director

JAN 05 1994

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
Mark S. Schwind
Allied-Signal Aerospace Co.
Rt. 46 & Industrial Avenue
Teterboro, NJ 07608

RE: Sumitomo Machinery Corp.
Teterboro Boro, Bergen County
ISRA Case #88737

Dear Mr. Schwind:

New Jersey Department of Environmental Protection and Energy (NJDEPE) has reviewed Sumitomo's plan dated April 28, 1993 to use a low temperature thermal process to separate the naturally occurring radioactive material (NORM) waste contaminated with a RCRA listed hazardous waste to determine the classification of the separated soils.

Provided that the soils exiting the separation process contain residual volatile organic compounds (VOCs) which do not exceed the NJDEPE residential soil cleanup criteria or the impact to groundwater soil cleanup criteria, the soil is not classified as a hazardous waste under the Site Remediation Program guidelines. It is the responsibility of Sumitomo and AlliedSignal to ensure that the soil is not a RCRA hazardous waste, due to the presence of constituents other than VOCs. Should the soil be contaminated with NORM or any other constituents that do not meet the NJDEPE residential direct contact soil cleanup criteria or impact to groundwater soil cleanup criteria it should be handled and disposed of in accordance with the applicable regulations.

Please be advised that once the soil is delivered to Envirocare in Utah, a letter from the facility or a bill of lading stating the date and amount of soil received shall be sent to this office.

Should any questions arise concerning the material addressed herein, please contact Grace Jacob, the Case Manager, at (609) 633-7141.

Sincerely,

Carol Lynn J. Wolcott for

Maurice H. Migliarino, Section Supervisor
Bureau of Environmental Evaluation and
Cleanup Responsibility Assessment

c: R. Pennifil, EBASCO

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Attachment E

File

RECEIVED
DIVISION OF FACILITY
WIDE ENFORCEMENT

State of New Jersey
Department of Environmental Protection and Energy
Environmental Regulation
Hazardous Waste Regulation Program
CN 421
Trenton, NJ 08625-0421
Phone# 609-633-1418

Scott A. Weiner
Commissioner

Frank Coolick
Administrator

APR 8 11 AM '93

WATER & HAZARDOUS
WASTE ENFORCEMENT
METRO BUREAU

APR 02 1993

Mark S. Schwind, Environmental Engineer
Allied-Signal Aerospace Company
Bendix Guidance & Control Systems
Teterboro, NJ 07608-1173

RE: Hazardous Waste Facility (HWF) Permit Exemption Qualification Determination for the Proposed Thermal Volatilization/Separation Technology for Remediation of Contaminated Soil at Sumitomo Machinery of America, 7 Malcom Avenue, Teterboro, Bergen County, NJ, EPA ID No. NJD 986 622 439

Dear Mr. Schwind:

The Bureau of Hazardous Waste Engineering (Bureau) acknowledges receipt of your submittal dated March 19, 1993. The submittal includes information on SAREX MX-2000 Thermal Processor (MX-2000 System) which Allied-Signal Aerospace Company proposes to use for contaminated soil remediation at the Sumitomo Machinery of America's (facility) above referenced ECRA remediation site (ECRA Case No. 88-737). The submittal requests a Permit Exemption Qualification Determination from the Bureau for the above process involving the MX-2000 System.

Upon review of the submittal, the Bureau determines that the process involving the MX-2000 System for the separation of the hazardous waste contaminants from the contaminated soil at the referenced site shall not require a HWF permit from the Department. This determination of the Bureau is based on the USEPA's "contained-in" interpretation to the mixture rule which deals with the remediation of contaminated media, and the following understanding of the process:

1. The MX-2000 System does not treat any hazardous waste, rather it separates and recovers the hazardous waste constituents from the contaminated media (soil) prior to returning the soil to its place of excavation;

2. The separation process will not accomplish a change in the physical, chemical, or biological character or composition of the hazardous waste contaminants;

3. During the process of separation, the hazardous waste contaminants will not be rendered non-hazardous or less hazardous or safer to transport, store or dispose of;

4. The total volume of the hazardous waste contaminants will not be reduced; and

5. The above process will be conducted on-site.

Please note that this exemption is for the separation process involving MX-2000 System as applicable to the referenced site remediation project only. The management of the contaminated soil and the recovered hazardous waste contaminants shall comply with all applicable hazardous waste regulations as detailed below:

1. The contaminated soil shall be managed as if the soil is a hazardous waste. Stockpiling of excavated soil prior to processing, as suggested on page 2-7 of the submittal, shall only be conducted within the area of concern (AOC) as agreed by the ECRA case manager for the site, or else, the management of excavated soil shall comply with the generator's accumulation provisions of N.J.A.C. 7:26-9.3(a) or 9.3(b);

2. The hazardous constituents of the contaminated soil must be reduced to a "de minimus" level prior to putting back to its place of excavation. The Department's Site Remediation Program establishes this health or risk based "de minimus" levels which are site specific. For more information on these levels, Grace Jacob, the ECRA case manager for the site may be contacted at (609) 633-7141; and

3. Any recovered hazardous waste contaminant or treated soil with contamination above the "de minimus" level shall be also be managed as hazardous waste in compliance with generator's accumulation provisions of N.J.A.C. 7:26-9.3(a) and/or 9.3(b).

Please be advised that this exemption from HWF permit requirements shall not be construed as a waiver from obtaining any permits or authorizations from other Federal, State or local agencies, which may be applicable for the operation of MX-2000 System at the above site.

Should you have any questions on this matter, please call Zafar Billah of my staff at (609) 292-9880.

Very truly yours

Thomas Sherman

Thomas Sherman, Chief
Bureau of Hazardous Waste Engineering

EP4/ZMB

c: Michael Poetzsch, USEPA Region II
Peter T. Lynch, MBWIWEFO
Grace Jacob, BEECRA

John Cali, Assistant Vice President
Sumitomo Machinery of America
4200 Holland Boulevard
P.O. Box 6628
Chesapeake, VA 23323

DOCUMENT: ALLIED1
FOLDER: CFDMOB

Attachment F

AlliedSignal
AEROSPACE

AlliedSignal Inc.
Guidance & Control Systems
Teterboro, NJ 07608-1173

201 288 2000

State of New Jersey
Department of Environmental Protection and Energy
Division of Enforcement Field Operations
Metro Bureau of Water & Hazardous Waste
2 Babcock Place
West Orange, New Jersey 07052

RECEIVED
DIVISION OF ENFORCEMENT
APR 11 12 04 PM '94
WASTE MGMT. BUREAU

April 5, 1994

Attn: Mr. William P. McQuiggan Jr.

Topic: RCRA Classification of Site Soils

Dear Mr. McQuiggan:

Pursuant to the Department's and AlliedSignal Inc. telecommunication of April 4, 1994, concerning the above referenced. Please find attached for your review the requested information.

AlliedSignal Inc. trusts that this meets with your approval and if there are any questions, please do not hesitate to contact the undersigned at 201-393-2452.

Sincerely,

Mark S. Schwind
Staff Environmental Engineer

cc: B. Hansen AlliedSignal Inc.
J. Cali Sumitomo Machinery Corporation of America
M. Malone Stier, Anderson and Malone

EBASCO

July 2, 1993

Ms. Norine Binder, Chief
New Jersey Department of Environmental
Protection and Energy
Hazardous Waste Regulation
Bureau of Advisement & Manifest
CN 421
Trenton, New Jersey 08625-0421

SUBJECT: ALLIED SIGNAL SUMITOMO PROJECT: CONFIRMATORY RESEARCH ON RCRA CLASSIFICATION OF SITE SOILS

Dear Ms. Binder:

1.0 INTRODUCTION

This letter is to advise you of the results of AlliedSignal Sumitomo Project confirmatory research on RCRA classification of site soils. It is being sent in accordance with a July 1, 1993 telephone conversation with Scott Weizel of your Bureau.

As you know AlliedSignal developed submissions for NJDEPE consideration regarding our approach to RCRA classification of site soils. These were transmitted to David Schrier of your Bureau on December 17, 1992 and to you on January 4, 1993 (Attachments A and B). Copies of these submissions have also been provided to Grace Jacob, the ECRA Case Manager. Several discussions occurred between AlliedSignal Sumitomo project participants and NJDEPE officials beginning in December 1992, to determine when, and under what circumstances, the NJDEPE would act upon the project submissions.

NJDEPE substantive reaction to date was in the form of a telephone call on May 10, 1993 from Charles Damico of your Bureau to Bernadette Doyle of Ebasco. Mr. Damico indicated that his understanding of the regulatory setting differed from the project submissions. Following the Damico conversation the project team decided to confirm our previous research prior to further NJDEPE discussions. The purpose of the confirmatory research was to determine if any relevant USEPA guidance had been overlooked, or if USEPA's position had changed since development of the project submissions.

This letter documents the results of these confirmatory research efforts. These results confirm the RCRA classification approach presented in the prior AlliedSignal Sumitomo project submissions to the NJDEPE. Further appropriate actions by concerned NJDEPE program elements and AlliedSignal can now be discussed, based on the regulatory review described in Section 2 of this letter.

EBASCO ENVIRONMENTAL *A Division of Ebasco Services Incorporated*
160 CHUBB AVENUE • LYNDHURST, N.J. 07071-3586 • (201) 460-6500

2.0 CONFIRMATORY RESEARCH

2.1 Contact with EPA RCRA/Superfund Hotline

The RCRA/Superfund Hotline was contacted regarding off-site application of the RCRA contained-in policy. The Hotline confirmed to Ebasco that the contained-in policy applies both on-site and off-site.

2.2 Contact with U.S. EPA Headquarters, Office of Solid Waste

The current application of the RCRA contained-in policy to environmental media was discussed with David Fagan, Branch Chief, Permits and State Programs Division, Corrective Action Group. David Fagan apparently is the person in charge of administering the contained-in policy.

He confirmed that the key elements of Ebasco's understanding were correct and had not changed since our original research. He advised that there is no on-site/off-site distinction, and that once EPA or the RCRA authorized state determines the soil no longer "contains" RCRA waste the soil is out of RCRA Subtitle C jurisdiction. David Fagan stated that there was no Federal number or Federal mechanism to make such a determination in a RCRA authorized state, and indicated that appropriate officials in NJDEPE should act upon the project submissions.

He also sent a file of materials which confirmed that the project has the most recent EPA Headquarters policy guidance on the contained-in policy. This is the March 1991 Sylvia Lowrance (Director, Office of Solid Waste) letter which has already been submitted to NJDEPE.

2.3 Electronic Database Search

An electronic database search was conducted to identify any regulatory changes or overlooked materials relating to the RCRA contained-in policy. In particular the search focused on references to the Federal court case which first upheld EPA's development of the "contained-in" policy, Chemical Waste Management, Inc. v. U.S. EPA, 869 F.2d 1526 (D.C. Cir. 1989). The database search did not identify any overlooked materials or subsequent court decisions which affected the validity of the U.S. EPA "contained-in" policy or the original project research.

2.4 Analysis of U.S. EPA's Likely Approach to Development of RCRA Land Disposal Restriction (LDR) Treatment Standards For Contaminated Soil

U.S.EPA has issued two Federal Register documents which address the likely approach to development of RCRA LDR treatment standards for contaminated soil. These documents provide additional support for the AlliedSignal approach, and are summarized here for NJDEPE officials. The first document (October 24, 1991 Federal Register) is an Advance Notice of Proposed Rulemaking for contaminated soil LDRs. The second document (October 20, 1992 Federal Register) is an approval of a hazardous soil case-by-case capacity variance from the RCRA LDRs.

The relevant language in these Federal Register documents indicates that U.S.EPA will likely move from the current risk-based soil concentration approach in the 1991 Sylvia Lowrance letter to a technology-based approach to excluding contaminated soils from RCRA jurisdiction. Specifically, EPA is considering a rulemaking approach whereby application of the treatment technology proposed by AlliedSignal for Sumitomo site soils - thermal desorption - would result in removal of treated soil from RCRA Subtitle C jurisdiction

"The Agency is considering codifying the contained-in policy when LDRs are promulgated for contaminated soils by determining that once a contaminated soil meets the applicable BDAT treatment standards, it no longer contains the hazardous waste, and therefore, is no longer subject to Subtitle C requirements."

56 Fed Reg. 55173, October 24, 1991

"... EPA is currently developing a separate set of treatment standards for hazardous soils. These standards will be based on the use of alternative technologies, including the use of technologies such as soil washing, thermal desorption, and biodegradation. These standards have not been proposed to date, but EPA announced its intention to issue such standards in an Advance Notice of Proposed Rulemaking, see 56 FR 55160; 55172-77 (October 24, 1991)."

57 Fed. Reg. 47773, October 20, 1992
(underlining added)

The most recent EPA Regulatory Agenda (April 26, 1993) does not set a schedule for issuance of a proposed or final rule.

3.0 PROPOSED COURSE OF ACTION

The results of this research confirm the AlliedSignal Sumitomo project's approach to RCRA classification of site soils which was first presented to the Bureau in December 1992. We will be contacting you in the near future to discuss further appropriate actions by concerned NJDEPE program elements and AlliedSignal.

Please feel free to contact me at (201) 460-6288 if you have any questions on this letter.

Very truly yours,

Walter P. Stepien for

Roger Pennifill
Project Manager

cc: G. Jacob (NJDEPE)
C. Damico (NJDEPE)
M. Schwind (AlliedSignal)
B. Hansen (AlliedSignal)
W. Stepien (Ebasco)
B. Doyle (Ebasco)

A0076.SAM

Allied-Signal Aerospace Company

Bendix Guidance & Control Systems
Teterboro, New Jersey 07608-1173
Telephone (201) 288-2000

New Jersey Department of Environmental
Protection & Energy
Bureau of Advisement & Manifest
Hazardous Waste Regulation Program
Environmental Regulation
CN 028
Trenton, New Jersey 08625-0028

January 4, 1993

Attention: Norine Binder, Acting Chief

Reference: AlliedSignal/Sumitomo Site
(Teterboro, NJ)
Remediation - Request for Regulatory
Applicability Determination for
NORM/RCRA Remediation Waste

Dear Ms. Binder:

This letter is to request a regulatory applicability determination for Naturally Occurring Radioactive Material (NORM)/RCRA remediation waste from remediation activities pursuant to the Environmental Cleanup Responsibility Act (ECRA). AlliedSignal, Inc. (AlliedSignal) is undertaking these remediation activities on behalf of Sumitomo Machinery Corporation of America (Sumitomo), in accordance with an agreement between the two companies regarding ECRA compliance activities at a Sumitomo facility in Teterboro, NJ. AlliedSignal is submitting this request to you in accordance with understands reached at a December 22, 1992 meeting with Mr. David Schrier of the NJDEPE. Briefly stated, AlliedSignal is requesting a regulatory applicability determination that site soils which have been processed with a thermal desorption unit to separate RCRA F001 wastes from the soil to a specified level no longer "contain" RCRA wastes, and can be managed as NORM waste for disposal at a properly licensed facility.

An information package describing NJDEPE involvement at the site, the waste in questions, and AlliedSignal's evaluation of the regulatory setting has been provided to Mr. Schrier. The specific regulatory issue presented is when, or at what level, environmental media (such as soil) which contain a RCRA listed waste (in this case F001 spent solvents) are no longer considered to "contain" those hazardous wastes. AlliedSignal's regulatory evaluation provided to Mr. Schrier indicates that the U.S. Environmental Protection Agency's policy on this issue has evolved from a "complete removal" (detection level) standard to a risk-based approach set by the regulatory agency overseeing the cleanup.

AlliedSignal respectfully requests that the NJDEPE issue a regulatory applicability determination that separation of the F001 waste from site soil, to the NJDEPE "below regulatory concern" Category 3 soil level (1 ppm for VOAs) means that the soil is no longer considered to contain F001 waste. Based upon our evaluation, it is submitted that this level is consistent with the current USEPA position on this issue. AlliedSignal thanks the Department for its cooperation in this matter and if you wish to discuss this further or need additional information beyond that which AlliedSignal has provided to Mr. Schrier, please do not hesitate to contact the undersigned at 201-393-2452.

Sincerely,

Mark S. Schwind
Environmental Engineer
MSS/sk

cc: B. Hansen (AlliedSignal)
J. Maher (AlliedSignal)
R. Pennifill (EBASCO)
W. Stepien (EBASCO)

Allied-Signal Aerospace Comp.

Bendix Guidance & Control Systems
Teterboro, New Jersey 07608-1173
Telephone (201) 288-2000

Allied Signal

Mr. David Schrier
NJDEPE - Division of Hazardous Waste Management
Bureau of Regulation, Classification and
Technical Assistance
401 E. State St.
CN-028
Trenton, New Jersey 08625

December 17, 1992

Dear Mr. Schrier:

I'd like to take this opportunity to introduce myself. I am the environmental engineer who is managing the present Sumitomo Machinery Corporation of America (Sumitomo) site project. I work for AlliedSignal Aerospace (AlliedSignal) in Teterboro. AlliedSignal is managing this project on behalf of Sumitomo in accordance with a currently existing agreement between the two companies.

As per your recent telephone conversation with EBASCO Environmental, we are providing you with some information about the contaminated soils which presently exist at the Sumitomo site in order to facilitate discussion about the means to classify the site soils as non-hazardous. The following presents a brief discussion of New Jersey Department of Environmental Protection and Energy (NJDEPE or the Department) involvement at the site, Section 1.0. It also includes an explanation of contamination at the site, Section 2.0, and the current regulatory setting for the project, Section 3.0. Section 4.0 provides a discussion of the methodology we propose to use to classify the site soils as non-hazardous.

1.0 NJDEPE Involvement at the Site

The Sumitomo facility in Teterboro is subject to the Environmental Clean-up Responsibility Act (ECRA). A case manager has been assigned to the site from the Responsible Party Clean-up Element. The case manager for the Sumitomo site is Ms. Grace Jacob. Numerous reports have been submitted to NJDEPE regarding site contamination. The Department has been involved in the pilot scale study of a thermal desorption technology to separate the volatile organic compounds (VOC's) from the soil. There have also been numerous discussions with the Department regarding the radiological contamination at the site.

2.0 Description of the Waste

The waste at the Sumitomo site consists of soil contaminated with radioactive and hazardous material. The soil is contaminated with Naturally Occurring Radioactive Material (NORM) and hazardous waste subject to the Resource Conservation and Recovery Act (RCRA). The NORM material consists of radium and thorium decay chains, assumed average activity level of 50 pCi/gm. The hazardous waste is F001 spent solvents, primarily trichloroethylene (TCE) and tetrachloroethylene (PCE). There is approximately 25,000-40,000 cubic feet of soil at the site.

3.0 Current Regulatory Setting

This section is divided into two parts; radiological and Federal RCRA. New Jersey regulatory requirements expected to affect application of the RCRA "contained in" policy are discussed with that policy.

3.1 Radiological

There have been substantial interactions with the NJDEPE during ongoing activities at the Sumitomo site, to distinguish between NORM materials at levels below regulatory concern and material which must be managed in recognition of its radiological nature. No near-term "Below Regulatory Concern" (BRC) legislative or regulatory developments are anticipated which might allow commercial disposal of excavated, NORM contaminated soils as "nonradioactive" or BRC material.

3.2 Federal RCRA

The Federal RCRA regulatory provisions expected to affect further disposition of Sumitomo site soils can be divided into three categories: 1) RCRA Land Disposal Restrictions; 2) Separation Issues - Evolution of the RCRA "Contain-In" Policy, Proposed Application in New Jersey. These provisions will now be briefly discussed.

It should be noted that the RCRA regulations also provided so-called "no migration" petition and "treatability" variances, which under appropriate circumstances offer relief from certain RCRA requirements. The methods do not appear relevant to the Sumitomo site circumstances. With respect to treatability variances, EPA has stated that they are inappropriate as the means to develop treatment standards for hazardous soils (57 Fed. Reg. 4773, October 20, 1992). It is also unlikely that a no migration petition could be obtained, since it is specific to a disposal facility.

3.2.1 <u>RCRA Land Disposal Restriction (LDRs)</u>

The EPA has taken the position that NORM materials containing RCRA listed or characteristic waste do not fall under the definition of mixed RCRA/radioactive wastes, since the NORM material "is not regulated by the Atomic Energy Act" (55 Fed Reg. 22645, June 1, 1990). However, EPA recognized the lack of alternative treatment capacity and granted a two year national capacity variance (until May 8, 1992) from the RCRA LDRs to "hazardous wastes that contain NORM" (40 CFR 268.35(c)), separate and distinct from LDR provisions addressing soils contaminated with "radioactive mixed waste" (40 CFR 268.35(d)).

EPA recently extended the national capacity variance for most soils contaminated with "radioactive mixed waste" for an additional one year period (until May 8, 1993), but did not issue a corresponding extension for the NORM LDR provision (see 57 Fed. Reg. 4772, October 20, 1992). However, even if the Sumitomo soil were classified as "LLRW" rather than NORM, the LDR extension does not apply to soil contaminated with F001 spent solvents, since these were covered by the RCRA Section 3004(e) prohibition and further extension is not possible for these wastes.

The RCRA Land Disposal Restriction concentration based treatment standard for F001-F005 spent solvents (non wastewater) is 5.6 ppm (total concentration) for both trichloroethylene and tetrachloroethylene (40 CFR 268.43 TABLE CCW). This represents a recent revision to the F001-F005 spent solvents treatment standards (57 Fed. Reg. 37194, August 18, 1992). Sumitomo site soil must at a minimum meet these LDR Standards prior to land disposal.

3.2.2 Evolution of the RCRA "Contained-In" Policy, Proposed Application in New Jersey

EPA in recent years has developed the so-called RCRA "contained-in" policy. the "contained in" policy states that environmental media (such as soil) which contains a RCRA listed waste must be managed as if the media were a hazardous waste, unless and until it no longer "contains" the listed waste (i.e. until decontaminated), or is delisted. EPA recently codified the "contained-in" policy as it applies to so called "debris", defined under RCRA regulations to include cobbles and boulders exceeding 60 mm particle size. The Sumitomo site soil is comprised primarily of smaller soil particles and pebbles rather than cobbles, so it is not governed by the "Debris Rule" (see 57 Fed. Reg. 37222, August 18, 1992).

In the absence of a RCRA regulation on the application of the "contain-in" policy to environmental media such as the Sumitomo site soil, EPA policy is identified from Agency documents such as official communications and Federal Register preamble language. A review of EPA documents obtained by EBASCO through Freedom of Information Act requests and Federal Register searches indicates that the Agency's policy has evolved since 1989 from a so-called "complete removal" standard to a so-called "risk assessment" approach (see attached EPA letters issued by Jonathan Cannon, Acting assistance Administrator, and Sylvia Lowrence, director, Office of Solid Waste). The most recent operative language found by EBASCO is in the preamble to the proposed "Debris Rule".

"The Agency has not issued any general rules as to when, or at what levels, environmental media or debris contaminated with hazardous wastes are no longer considered to "contain" those hazardous wastes. EPA believes that such levels for media are most appropriately determined on a site-specific basis by the EPA region (or authorized State) overseeing the cleanup of such materials, such as a Superfund or Corrective action remediation. Such levels for media are generally determined according to risk". 57 Fed. Rev. 986, January 9, 1992 (underlining added).

As noted above, EPA has since issued a final "Debris Rule" which states that; 1) material normally considered to be soil should be subject to the Agency planned LDRs for contaminated soil rather than the Debris Rule (see 57 Fed. Reg. 37223-27224, August 18, 1992); 2) EPA regional Administrator, on a case-by-case basis, will determine upon request whether or not debris contains hazardous waste at "significant levels, taking into consideration such factors as site hydrogeology and potential exposure pathways, but excluding management practices "(57 Fed. Reg. 37226, August 18, 1992) new 40 CFR 261.3(f)(2)). In separate but related rulemakings, EPA has; 1) formally withdrawn the proposed Hazardous Waste Identification Rule (WHIR) which addressed issues related to regulation of contaminated media (57 Fed. Reg. 49280, October 30, 1992); and 2) restated its intention to develop a separate set of treatment standards for hazardous soils (57 Fed. Reg. 47772, October 20, 1992). In the October 20 Federal Register document (also discussed in Section 1.2.2.1 regarding ECRA LDRs) EPA stated that it is constrained with respect to F001 soils by the RCRA Section 3004(e) statutory prohibition on land disposal.

Based upon this evaluation, the operative EPA RCRA guidance on the contamination levels below which environmental media are no longer considered to "contain" listed hazardous wastes is the Federal Register preamble language quoted above, and repeated in part here;

> "EPA believes that such levels for media are most appropriately determined on a site specific basis by the EPA region (or authorized State) overseeing the clean-up of such materials, such as a Superfund or Corrective action remediation. Such levels for media are generally determined according to risk." 57 Fed. Reg. 986, January 9, 1992 (underlining added).

The proposed application of this EPA position to NJDEPE's Waste Classification Process is as follows. NJDEPE offers a waste classification service to New Jersey waste generators, through which "letters of classification" are issued after receipt of a completed "Waste Classification Request Form" (HWM-009). With regard to the "contained in" policy for contaminated environmental media, the NJDEPE guidance which appears to best meet the EPA intent quoted above are the guidelines for so-called "Category 3 soils". This is derived from NJDEPE guidance documents on management of excavated soils. Briefly stated, NJDEPE classifies soils by concentration of contaminants. The most contaminated category are those soils which NJDEPE deems must be managed as hazardous waste. the next category (in decreasing concentration of contaminants) are those soils which must be managed as dry industrial waste termed "ID 27 soils" under NJDEPE's solid waste classification system. Excavated soils which exhibit contaminant concentrations "below regulatory concern" thus are termed "Category 3" soils. The Category 3 soil limit maximum allowable level for priority pollutant volatile organics (such as TCE and PCE) is 1 ppm (mg/kg).

4.0 Methodology to Classify as Non-Hazardous

Since the Sumitomo site soils contain F001 wastes in excess of 5.6 ppm (total concentration) the VOC's will have to be separated from the soils to obtain at least this level prior to land disposal. The soil will be processed through a thermal desorption system to separate the VOC's from the soil. If the soil exiting the thermal desorption unit consistently meets the Category 3 standard of 1 ppm for priority pollutant VOC's (such as TCE and PCE) we propose that the soils be deemed to "no longer contain" hazardous waste. They would still be managed as NORM waste and be disposed of at a properly licensed facility, but since they consistently met levels which the Department has established as "Below Regulatory Concern", they would be considered non-hazardous.

Using the Category 3 soils standard as the level at which to deem soils to "no longer contain" hazardous waste is consistent with the EPA approach both as was stated in the January 9, 1992 Federal Register and in Sylvia Lowrence's letter. Since the Department has designated these levels as below regulatory concern, they pose no significant risk to human health or the environment.

We would like to meet with you to discuss this methodology and to develop a processing protocol which would satisfy any concerns the Department may have. We look forward to meeting with you next week.

Sincerely,

Mark Schwind
Environmental Engineer
MS/sk

cc: B. Hansen
J. Maher
D. Leak
W. Hooper

HWEP-0038LE

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

MAR 26 1991

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

John E. Ely
Enforcement Director
Virginia Department of Waste Management
101 North 14th Street
Richmond, Virginia 23219

Dear Mr. Ely:

At the request of Carlyle C. Ring, Vice President and General Counsel of Atlantic Research Corporation, I am sending this letter to summarize the Agency's current position on the "contained-in" interpretative policy. It is my understanding, based upon Mr. Ring's letter, that there was some question as to whether the "contained-in" interpretative policy applies to all environmental media or only to ground water. Mr. Ring's letter also suggested that a letter from my Office would help resolve this matter. I hope this letter will answer this question and further clarify the policy. I have also enclosed, for your information, a memorandum from Jonathan Cannon to Thomas Jorling dated June 19, 1989. I hope that you will find these helpful.

The "contained-in" interpretation addresses environmental media (i.e., ground water, soil, and sediment) contaminated with RCRA listed hazardous waste. Our federal regulations at 40 CFR Part 261.3 identify hazardous wastes. Among other things, these regulations state that a solid waste mixed with a hazardous waste is a hazardous waste. However, these regulations generally do not specifically address environmental media, which are not solid wastes, mixed with listed hazardous waste. The Agency's position continues to be that mixtures of environmental media and listed hazardous waste (i.e., contaminated ground water, contaminated soil, and contaminated sediments) must be managed as if they were hazardous waste. This position is known as the "contained-in" policy. EPA's application of the "contained-in" policy to contaminated media was upheld by the D.C. Circuit Court of Appeals in Chemical Waste Management, Inc. v. U.S. EPA, 869 F.2d 1526 (D.C. Cir. 1989).

Consistent with this approach, the Agency further interprets the regulations to mean that environmental media contaminated with listed hazardous waste must be managed as if they were hazardous waste until the media no longer contain the listed hazardous waste (i.e., until decontaminated), or are delisted. To date, the Agency has not issued any definitive guidance as to

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when, or at what levels, environmental media contaminated with listed hazardous waste no longer contain that hazardous waste. Until such guidance is issued, the Regions or authorized States may determine these levels on a case-specific basis. However, as you know, States that are authorized to implement the RCRA hazardous waste program, as Virginia is, are not bound by EPA's interpretation of the Federal regulations. Although they usually follow Federal interpretations, authorized States may interpret their own regulations more strictly than EPA interprets the Federal regulations.

Related to making a determination as to when contaminated media no longer contains listed hazardous waste, we suggest that a risk assessment approach be used that addresses the public health and environmental impacts of hazardous constituents remaining in the treated soils. And as stated above, the authorized State could apply more stringent standards or criteria for contaminated environmental media than those recommended by the Federal EPA if the authorized state determined it to be appropriate. [Note: However, this approach does not apply to residuals from the treatment of listed hazardous waste or mixtures of solid waste with listed hazardous waste under our current regulations, which must be delisted.]

I hope that this letter will be helpful to you in establishing and implementing Virginia's hazardous waste policies on related issues. Should you have any questions concerning EPA's "contained-in" interpretative policy, please contact Steve Cochran, Acting Chief of the Waste Identification Branch, at (202) 382-4770.

Sincerely yours,

Sylvia K. Lowrance
Director
Office of Solid Waste

cc: C. Ring
D. Freedman

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

JUN 19 1989

Mr. Thomas C. Jorling
Commissioner
Department of Environmental Conservation
State of New York
Albany, New York 12233-1010

Dear Mr. Jorling:

I am writing in response to your letter of May 5, 1989, in which you ask numerous questions concerning the regulatory status, under the Resource Conservation and Recovery Act (RCRA), of environmental media (ground water, soil, and sediment) contaminated with RCRA-listed hazardous waste.

As you point out in your letter, it is correct that the Agency's "contained-in" interpretation is that contaminated environmental media must be managed as if they were hazardous wastes until they no longer contain the listed waste, or are delisted. This leads to the critical question of when an environmental medium contaminated by listed hazardous waste ceases to be a listed hazardous waste. In your letter, you discuss three possible answers (based on previous EPA positions and documents) which you believe address this question, and request the Agency to clarify its interpretation. Each of these is discussed below.

The first possible answer you cite would be that the contaminated media would be a hazardous waste unless and until it is delisted, based on the "mixture" and "derived-from" rules. As you correctly state in your letter, a waste that meets a listing description due to the application of either of these rules remains a listed hazardous waste until it is delisted. However, these two rules do not pertain to contaminated environmental media. Under our regulations, contaminated media are not considered solid wastes in the sense of being abandoned, recycled, or inherently waste-like as those terms are defined in the regulations. Therefore, contaminated environmental media cannot be considered a hazardous waste via the "mixture" rule (i.e., to have a hazardous waste mixture, a hazardous waste must be mixed with a solid waste per 40 CFR 261.3(a)(2)(iv)). Similarly, the "derived-from" rule does not apply to contaminated media. Our basis for stating that contaminated environmental media must be managed as hazardous wastes is that they "contain"

listed hazardous waste. These environmental media must be managed as hazardous waste because, and only as long as, they "contain" a listed hazardous waste, (i.e., until decontaminated).

The second possibility you mention is that environmental media contaminated with a RCRA listed waste no longer have to be managed as a hazardous waste if the hazardous constituents are completely removed by treatment. This is consistent with the Agency's "contained-in" interpretation and represents the Agency's current policy.

The third possibility you discuss comes from Sylvia Lowrance's January 24, 1989, memorandum that you cited in your letter. This memorandum indicates that OSW has not issued any definitive guidance as to when, or at what levels, environmental media contaminated with listed hazardous waste are no longer considered to contain that hazardous waste. It also states that until such definitive guidance is issued, the Regions may determine these levels on a case-specific basis. Where this determination involves an authorized State, such as New York, our policy is that the State may also make such a determination.

Related to such a determination, you ask whether a risk assessment approach that addressed the public health and environmental impacts of hazardous constituents remaining in treatment residuals would be acceptable. This approach would be acceptable for contaminated media provided you assumed a direct exposure scenario, but would not be acceptable for "derived-from" wastes under our current rules. Additionally, consistent with the statute, you could substitute more stringent standards or criteria for contaminated environmental media than those recommended by the Federal EPA if you determined it to be appropriate.

The Agency is currently involved in a rulemaking effort directed at setting de minimis levels for hazardous constituents below which eligible listed wastes, treatment residuals from those wastes, and environmental media contaminated with those listed wastes would no longer have to be managed as hazardous wastes. The approach being contemplated in the De Minimis program would be similar to that used in the proposed RCRA Clean Closure Guidance in terms of the exposure scenario (direct ingestion), the management scenario (not in a waste management unit), and the levels (primarily health-based).

Your final question related to whether the "remove and decontaminate" procedure set forth in the March 19, 1987 Federal Register preamble to the conforming regulations on closing surface impoundments applies when making complete removal determinations for soil. These procedures do apply when one

chooses to clean close a hazardous waste surface impoundment by removing the waste. The preamble language states that the Agency interprets the term "remove" and "decontaminate" to mean removal of all wastes, liners, and/or leachate (including ground water) that pose a substantial present or potential threat to human health or the environment (52 FR 8706). Further discussion of these requirements is provided in a clarification notice published on March 28, 1988, (53 FR 1144) and in OSWER Policy Directive # 9476.00-18 on demonstrating equivalence of Part 265 clean closure with Part 264 requirements (copy enclosed).

I hope that this response will be helpful to you in establishing and implementing New York's hazardous waste policies on related issues. Should you have additional questions, please contact Bob Dellinger, Chief of the Waste Characterization Branch at (202) 475-8551.

Sincerely yours,

Jonathan Z. Cannon
Acting Assistant Administrator

State of New Jersey
Department of Environmental Protection and Energy
Environmental Regulation
Hazardous Waste Regulation Program
CN 421
Trenton, NJ 08625-0421
Phone# 609-633-1418

Scott A. Weiner
Commissioner

Frank Coolick
Administrator

APR 29 1993

Mark S. Schwind, Environmental Engineer
Allied-Signal Aerospace Company
Bendix Guidance & Control Systems
Teterboro, NJ 07608-1173

RE: Hazardous Waste Facility (HWF) Permit Exemption Qualification Determination for the Proposed Thermal Volatilization/Separation Technology for Remediation of Contaminated Soil at Sumitomo Machinery of America, 7 Malcom Avenue, Teterboro, Bergen County, NJ, EPA ID No. MJD 986 622 439

Dear Mr. Schwind:

The Bureau of Hazardous Waste Engineering (Bureau) acknowledges receipt of your letter dated April 12, 1993, which documents Allied Signal Aerospace Company's (Allied) understanding of the telephone conversation between yourself and Zafar Billah of my staff dated April 8, 1993. The telephone conversation was intended to clarify whether the Bureau's April 2, 1993 letter to Allied exempting the operation of SAREX MX-2000 Thermal Processor (MX-2000 System) for contaminated soil remediation at the Sumitomo Machinery of America's (facility) above referenced ECRA remediation site would still hold if after the separation and recovery of the hazardous waste constituents from the soil, the soil containing very low level of naturally occurring radioactive material (NORM) is disposed off-site, rather than returned to the place of excavation.

Please be advised that since NORM is not a hazardous waste, the disposal of the processed soil containing very low level of NORM, whether on-site or off-site, would not have any impact on the Bureau's determination of a hazardous waste facility permit exemption outlined in the letter dated April 2, 1993.

Should you have any questions on this matter, please call Zafar Billah of my staff at (609) 292-9880.

Very truly yours

Thomas Sherman, Chief
Bureau of Hazardous Waste Engineering

EP4/ZMB

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c: Michael Poetzsch, USEPA Region II
Peter T. Lynch, MEWHWEFO
Grace Jacob, BEECRA

John Cali, Assistant Vice President
Sumitomo Machinery of America
4200 Holland Boulevard
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Chesapeake, VA 23323

DOCUMENT: ALLIED1
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Bendix Guidance & Control Systems
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Telephone (201) 229-2000

Allied Signal

State of New Jersey
Department of Environmental Protection and Energy
Environmental Regulation
Hazardous Waste Regulation Program
CN421
Trenton, New Jersey 08625-0421

April 12, 1993

Attn: Mr. Zafar Billah

Reference: Hazardous Waste Facility (HWF) Permit Exemption Qualification Determination for the Proposed Thermal Volatilization/Separation Technology for Remediation of Contaminated Soil at Sumitomo Machinery Corporation of America, 7 Malcolm Avenue, Teterboro, Bergen County, NJ, EPA ID No: NJD 986 622 439

Dear Mr. Billah:

Pursuant to AlliedSignal Inc. and the Department's telecommunication of April 8, 1993, seeking clarification of the Department's RCRA Exemption approval letter of April 2, 1993, concerning the above referenced. It is AlliedSignal Inc. understanding that NORM contaminated soils may be shipped off-site to an approved disposal facility in lieu of returning the soil to its place of excavation.

AlliedSignal Inc. thanks the Department for it's cooperation in this matter and if there are any questions concerning this letter, please do not hesitate to contact the undersigned at 201-393-2452.

Sincerely,

Mark S. Schwind
Environmental Engineer

cc: B. Hansen - AlliedSignal Inc.
J. Cali - Sumitomo Machinery Corporation of America
M. Malone - Stier, Anderson & Malone Law Offices

State of New Jersey
Department of Environmental Protection and Energy
Environmental Regulation
Hazardous Waste Regulation Program
CN 421
Trenton, NJ 08625-0421
Phone# 609-633-1418

Scott A. Weiner
Commissioner

Frank Coolick
Administrator

APR 02 1993

Mark S. Schwind, Environmental Engineer
Allied-Signal Aerospace Company
Bendix Guidance & Control Systems
Teterboro, NJ 07608-1173

RE: Hazardous Waste Facility (HWF) Permit Exemption Qualification Determination for the Proposed Thermal Volatilization/Separation Technology for Remediation of Contaminated Soil at Sumitomo Machinery of America, 7 Malcom Avenue, Teterboro, Bergen County, NJ, EPA ID No. NJD 986 622 439

Dear Mr. Schwind:

The Bureau of Hazardous Waste Engineering (Bureau) acknowledges receipt of your submittal dated March 19, 1993. The submittal includes information on SAREX MX-2000 Thermal Processor (MX-2000 System) which Allied-Signal Aerospace Company proposes to use for contaminated soil remediation at the Sumitomo Machinery of America's (facility) above referenced ECRA remediation site (ECRA Case No. 88-737). The submittal requests a Permit Exemption Qualification Determination from the Bureau for the above process involving the MX-2000 System.

Upon review of the submittal, the Bureau determines that the process involving the MX-2000 System for the separation of the hazardous waste contaminants from the contaminated soil at the referenced site shall not require a HWF permit from the Department. This determination of the Bureau is based on the USEPA's "contained-in" interpretation to the mixture rule which deals with the remediation of contaminated media, and the following understanding of the process:

1. The MX-2000 System does not treat any hazardous waste, rather it separates and recovers the hazardous waste constituents from the contaminated media (soil) prior to returning the soil to its place of excavation;

2. The separation process will not accomplish a change in the physical, chemical, or biological character or composition of the hazardous waste contaminants;

3. During the process of separation, the hazardous waste contaminants will not be rendered non-hazardous or less hazardous or safer to transport, store or dispose of;

4. The total volume of the hazardous waste contaminants will not be reduced; and

5. The above process will be conducted on-site.

Please note that this exemption is for the separation process involving MX-2000 System as applicable to the referenced site remediation project only. The management of the contaminated soil and the recovered hazardous waste contaminants shall comply with all applicable hazardous waste regulations as detailed below:

1. The contaminated soil shall be managed as if the soil is a hazardous waste. Stockpiling of excavated soil prior to processing, as suggested on page 2-7 of the submittal, shall only be conducted within the area of concern (AOC) as agreed by the ECRA case manager for the site, or else, the management of excavated soil shall comply with the generator's accumulation provisions of N.J.A.C. 7:26-9.3(a) or 9.3(b);

2. The hazardous constituents of the contaminated soil must be reduced to a "de minimus" level prior to putting back to its place of excavation. The Department's Site Remediation Program establishes this health or risk based "de minimus" levels which are site specific. For more information on these levels, Grace Jacob, the ECRA case manager for the site may be contacted at (609) 633-7141; and

3. Any recovered hazardous waste contaminant or treated soil with contamination above the "de minimus" level shall be also be managed as hazardous waste in compliance with generator's accumulation provisions of N.J.A.C. 7:26-9.3(a) and/or 9.3(b).

Please be advised that this exemption from HWF permit requirements shall not be construed as a waiver from obtaining any permits or authorizations from other Federal, State or local agencies, which may be applicable for the operation of MX-2000 System at the above site.

Should you have any questions on this matter, please call Zafar Billah of my staff at (609) 292-9880.

Very truly yours

Thomas Sherman, Chief
Bureau of Hazardous Waste Engineering

EP4/ZMB

c: Michael Poetzsch, USEPA Region II
Peter T. Lynch, MBWHWEFO
Grace Jacob, BEECRA

John Cali, Assistant Vice President
Sumitomo Machinery of America
4200 Holland Boulevard
P.O. Box 6628
Chesapeake, VA 23323

DOCUMENT: ALLIED1
FOLDER: CFDMOB

Allied-Signal Aerospace Company

Bendix Guidance & Control Systems
Teterboro, New Jersey 07608-1173
Telephone (201) 288-2000

Allied Signal

New Jersey Department of Environmental Protection
and Energy
Division of Hazardous Waste Management
Bureau of Hazardous Waste Engineering
CN-028
Trenton, New Jersey 08625-0028

March 19, 1993

Attention: Mr. Tom Sherman

Reference: Enhanced Thermal Volatization/Separation Technology

Dear Mr. Sherman:

Confirming AlliedSignal Inc. and the Department's telecommunication of March 19, 1993, concerning the above referenced. It is AlliedSignal Inc.s' understanding that the use of enhanced thermal volatization/separation technology is a RCRA exempt technology. This is based on the fact that the separation of RCRA wastes, listed of characteristic wastes from soils, is not considered treatment and thereby is not regulated under RCRA.

Furthermore, it is AlliedSignal Inc.s' understanding that the Department, at this time, will confirm this RCRA exemption in writing upon submittal of a technology briefing and $600.00 RCRA exemption review fee.

Based on the above, attached for the Department's review and approval of this RCRA exemption is the required $600.00 RCRA exemption review fee and a technology briefing of the enhanced thermal volatization separation unit to be employed at the Sumitomo ECRA remdiation site.

AlliedSignal thanks the Department for it's cooperation in this matter and would appreciate an expeditious review of this RCRA exemption application. In addition, if there are any questions concerning this letter, please do not hesitate to contact the undersigned at 201-393-2452.

Sincerely,

Mark S. Schweind
Environmental Engineer

cc: B. Hansen(AlliedSigual)
J. Cali(Sumitomo Machinery)
J. Dette(Dames & Moore)
M. Malone(Stier, Anderson & Malone)
G. Jacobs(NJDEPE)

AlliedSignal
AEROSPACE

AlliedSignal Inc.
Guidance & Control Systems
Teterboro, NJ 07608-1173

201 288 2000

7/13 received

United States Environmental Protection Agency
Hazardous Waste Compliance Branch
Region II
290 Broadway
22nd Floor
New York, New York 10007-1866

July 7, 1995

Attn: Ms Jessica Gottlieb

Re: AlliedSignal Aerospace
EPA Id No: NJD078714433
EPA Letter dated June 15, 1995

Dear Ms Gottlieb:

AlliedSignal Aerospace is in receipt of and has reviewed your letter dated June 15, 1995, concerning the LandBan Disposal Notifications (LDRs). Please be advised, that these are the LDR notices that were attached to the Manifests that were sent with the hazardous waste shipments. It is noted, that these LDRs were obtained from the Treatment Storage Disposal Facilities to where the waste was shipped and received, in order to complete AlliedSignal Aerospace files.

Accordingly, attached for your review are the fax cover sheets from the TSDFs as they were faxed to AlliedSignal Aerospace in order to comply with EPA's retention policy. In addition, it is noted that the Environmental Protection Agency may contact the TSDFs to confirm these were the LDRs that were sent with the shipment. To facilitate in the ability to contact these facilities the following information is provided:

Facility: Phibrotech, Inc.
10 Industry Avenue
Joliet, Illinois 60435

Phone: (815) 727-3010
Fax: (815) 727-3010

Contact: Carolyn

Facility: Marisol Inc.
125 Factory Lane
Middlesex, New Jersey

Phone: (908) 469-5100
Fax: (908) 469-2761

Contact: Joann Kohl

In addition, the following explanation is provided to EPA why the Manifest Number was crossed out and initialed on the LDR:

1. For manifest number IL3412239 - Originally a New Jersey manifest was going to be used to ship the hazardous waste to Illinois. However, a Illinois manifest was provided by the facility to be used in this shipment. The LDR was changed to reflect this manifest change.

2. For manifest number NJA0996961 and NJA0996964 - Since AlliedSignal Aerospace did not have continuation sheets a separate manifest was used to facilitate in the shipment of one additional drum to the disposal site. For manifest number NJA0996964 the numbers were reversed 46 instead of 64, which was changed and initialed to reflect the appropriate manifest number and for manifest number NJA0996961 a photocopy was made of NJA0996964 LDR, prior to signature, the manifest number was changed and initialed to reflect the appropriate manifest number.

Allied Signal Aerospace trusts this explanation meets with Environmental Protection Agencies approval and if there are any questions, please do not hesitate to contact the undersigned at (201) 393-2452.

Sincerely,

Mark S Schwind
Staff Environmental Engineer

Attachments

P.O. BOX 19276 SPRINGFIELD, ILLINOIS 62794-9276 (217) 782-6761

State Form LPC 62 9/91 IL532-0610

FOR SHIPMENT OF HAZARDOUS, INFECTIOUS AND SPECIAL WASTE.

PLEASE TYPE (Form designed for use on elite (12-pitch) typewriter.)

EPA Form 8700-22 (Rev. 9-88)

Form Approved. OMB No. 2050-0039, Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. NSD078714433 | Manifest Document No. 0993

2. Page 1 of 1

Information in the shaded areas is not required by Federal law, but is required by Illinois law.

3. Generator's Name and Mailing Address / Location If Different:
Allied-Signal Aerospace Company
Route 46 Teterboro, NJ 07608

4. Generator's Phone (201) 393-2724

A. Illinois Manifest Document Number: IL 3412239 MANIFEST FEE EXEMPT

B. Illinois Generator's ID: 9340035417

C. Illinois Transporter's ID: 1540

D. (201) 462-1001 Transporter's Phone

5. Transporter 1 Company Name: Freehold Cartage, Inc. | 6. US EPA ID Number: NJD054126164

7. Transporter 2 Company Name | 8. US EPA ID Number

E. Illinois Transporter's ID

F. ( ) Transporter's Phone

9. Designated Facility Name and Site Address
CP Inorganics
10 Industrial Ave.
Joliet, IL 60435

10. US EPA ID Number: ILD062480850

G. Illinois Facility's ID: 1970250002

H. Facility's Phone: 815-727-4465

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	Waste No.
a. RQ Waste Corrosive Liquid, N.O.S. (Cupric Chloride) (D002, D008) UN 1760, DOTE 9166	002	DF	0105	1	EPA HW Number XXD002; Authorization Number 000965
b. (RQ=100#) Waste Ammonium Hydroxide Solution Corrosive Liquid (D002) NA 2672	008	DF	0420	1	EPA HW Number XXD002; Authorization Number 000059
c.					EPA HW Number XX; Authorization Number
d.					EPA HW Number XX; Authorization Number

J. Additional Description for Materials Listed Above
A. Waste Cupric Chloride Solution for Resource Recovery which is part of our Program of waste minimization.
B. 1/2 Gal. Ammonium Hydroxide 35%, water 65%

K. Handling Codes for Wastes Listed Above in Item #14
1 = Gallons 2 = Cubic Yards

15. Special Handling Instructions and Additional Information
In case of spill, refer to attached DOT Response Guide No. 60, contact 24 hr. emergency response telephone # Chemtrec 1-800-424-9300.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: William A. Hooper | Signature: William A. Hooper | Date (Month Day Year): 06 22 92

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Bob Sommers | Signature: Bob Sommers | Date (Month Day Year): 06 22 92

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name | Signature | Date (Month Day Year)

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: S. Salnowski | Signature | Date (Month Day Year): 6-25-92

This Agency is authorized to require, pursuant to Illinois Revised Statutes, Chapter 111½ Section 21, that this information be submitted to the Agency. Failure to provide the information may result in a civil penalty against the owner or operator of not to exceed $25,000 per day of violation. Falsification of this information may result in a fine up to $50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center

COPY 1. TSD MAIL TO GENERATOR

JUN 25 '92

PHIBRO-TECH, INC.

FACSIMILE COVER PAGE

TO: Jeff
Allied - Signal Aerospace Co

FACSIMILE: 201-393-6553

TELEPHONE:

FROM: Carolyn

FACSIMILE: (815)727-7545

TELEPHONE: (815)727-3010 OR (815)727-4465

DATE: 5-17-93

NO. OF PAGES (INCL. COVER): 2

[✓] As you requested
[ ] For your information
[ ] Please call when received
[ ] Reply requested

COMMENTS:
Land Bank for Morristown NJ 3412239

10 INDUSTRY AVENUE · JOLIET, ILLINOIS 60435 · (815) 727-3010 · FAX (815) 727-7545

PLEASE RECYCLE

LANI ISPOSAL RESTRIC. ON NOTICE

In accordance with 40 CFR 268.7 this notice is to inform you that these wastes are restricted from land disposal unless they are treated: 1.) to below the treatment standards specified in 268.41 or 2.) in accordance with the technology-based standards defined in 268.42, namely, FSUBS (Fuel substitution), INCIN (Incineration) and/or RORGS (Recovery of organics).

The wastes are:

	D001		U080		U196
X	D002		U083		U203
	U001		U084		U208
	U002		U085		U209
	U003		U088		U210
	U004		U092		U211
	U008		U102		U213
	U009		U107		U220
	U012		U108		U225
	U019		U110		U226
	U028		U112		U227
	U031		U113		U228
	U037		U117		U239
	U043		U118		U328
	U044		U121		U353
	U051		U122		U359
	U052		U124		
	U053		U125		
	U054		U140		
	U055		U152		
	U056		U154		
	U057		U159		
	U069		U161		
	U070		U162		
	U071		U169		
	U072		U171		
	U076		U186		
	U077		U188		
	U078		U191		
	U079		U194		

GENERATOR Allied Signal Aerospace MANIFEST No. [redacted] IL 3412239 WAG

SIGNATURE William A Hooper DATE 6-22-92

State of New Jersey
Department of Environmental Protection
Division of Hazardous Waste Management
Manifest Section
CN 028, Trenton, NJ 08625

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. N J D 0 7 8 7 1 4 4 3 3 Manifest Document No. 1 0 0 0 5

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

A. State Manifest Document Number: NJA 0996961

B. State Generator's ID: SAME

3. Generator's Name and Mailing Address
ALLIED-SIGNAL AEROSPACE COMPANY
ROUTE 46 TETERBORO, NJ 07608

4. Generator's Phone (201) 393-2724

5. Transporter 1 Company Name: MARISOL INCORPORATED

6. US EPA ID Number: N J D 0 0 2 4 5 4 5 4 4

C. State Trans. ID: NJDEPS- 1-5-8

7. Transporter 2 Company Name

8. US EPA ID Number

D. Transporter's Phone (908) 469-5100

E. State Trans. ID

9. Designated Facility Name and Site Address
MARISOL INCORPORATED
125 FACTORY LANE
MIDDLESEX, NJ 08846

10. US EPA ID Number: N J D 0 0 2 4 5 4 5 4 4

F. Transporter's Phone ( )

G. State Facility's ID

H. Facility's Phone (908) 469-5100

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	Waste No
a. RQ WASTE 1-1-1 TRICHLOROETHANE, ORM-A, F-001, UN 2831	X	0 1	DM			F 0 0 1
b. RQ WASTE METHYLENE CHLORIDE, ORM-A, F-001, UN 1593	X	0 1	DM		L	F 0 0 1
c. HAZARDOUS WASTE LIQUID, N.O.S., (TRIFLUORO-TRICHLOROETHANE), ORM-E, NA 9189	X	0 2	DM		L	F 0 0 1
d. RQ TRICHLOROETHYLENE, ORM-A, F-001, UN 1710	X	0 2	DM		L	F 0 0 1

J. Additional Descriptions for Materials Listed Above

a. L/T: TRICHLOROETHANE 100%

b. L/T: METHYLENE CHLORIDE 100%

c. L/T: TRIFLUOROTRICHLOROETHANE 100%

d. L/T: TRICHLOROETHYLENE 100%

K. Handling Codes for Wastes Listed Above

a. T 0 4 c. T 0 4

b. T 0 4 d. T 0 4

15. Special Handling Instructions and Additional Information
MATERIAL TO BE BENEFICIALLY RECLAIMED ACCORDING TO AEAC WASTE MINIMIZATION PLAN. IN CASE OF EMERGENCY, THE 24 HOUR RESPONSE INFORMATION TELEPHONE IS CHEMTREC 1-800-424-9300, AND REFER TO ATTACHED DOT RESPONSE GUIDE.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: MARK SCIENZO Signature Month Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name Signature Month Day Year

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name Signature Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name Signature Month Day Year

NJA 0996961

EPA Form 8700-22 (Rev. 9/88) Previous editions are obsolete

State of New Jersey
Department of Environmental Protection
Division of Hazardous Waste Management
Manifest Section
CN 028, Trenton, NJ 08625

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 8-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No: N J D 0 7 8 7 1 4 4 3 3 1 0 0 1 1 — Manifest Document No

2. Page 1 of 1 — Information in the shaded areas is not required by Federal law

A. State Manifest Document Number: NJA 0996964

B. State Generator's ID: SAME

3. Generator's Name and Mailing Address
ALLIED-SIGNAL AEROSPACE COMPANY
ROUTE 46 TETERBORO, NJ 07608

4. Generator's Phone: (201) 393-2724

5. Transporter 1 Company Name: MARISOL INCORPORATED — 6. US EPA ID Number: N J D 0 0 2 4 5 4 5 4 4

C. State Trans. ID: NJDEPS-[illegible]

7. Transporter 2 Company Name — 8. US EPA ID Number

D. Transporter's Phone: 908 469-5100

E. State Trans. ID

9. Designated Facility Name and Site Address
MARISOL INCORPORATED
125 FACTORY LANE
MIDDLESEX, NJ 08846

10. US EPA ID Number: N J D 0 0 2 4 5 4 5 4 4

F. Transporter's Phone:

G. State Facility's ID

H. Facility's Phone: 908 469-5100

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	X RQ HAZARDOUS WASTE LIQUID, N.O.S., (TRICHLOROethane), ORM-E, F-001, UN 2831	01	DM	00934		F 0 0 1
b.						
c.						
d.						

J. Additional Descriptions for Materials Listed Above
L/T: WATER 99%
TRICHLOROETHANE 1%

K. Handling Codes for Wastes Listed Above: a. T 0 4

15. Special Handling Instructions and Additional Information
IN CASE OF EMERGENCY, THE 24 HOUR RESPONSE INFORMATION TELEPHONE IS CHEMTREC 1-800-424-9300, AND REFER TO ATTACHED DOT RESPONSE GUIDE.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

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Printed/Typed Name: MARK SCHWIND — Signature — Month Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name — Signature — Month Day Year

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name — Signature — Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name — Signature — Month Day Year

GENERATOR — TRANSPORTER — FACILITY

In Case of an emergency or spill immediately call the state the emergency occurred in and the N.J. Dept. of Environmental Protection. (609) 292-5568 (Day) (609) 392-7172 (Night)

NJA0996964

EPA Form 8700-22 (Rev. 3/88) Previous editions are obsolete.

MARISOL INC.
SOLVENT RECYCLING

TELECOPIER COVER LETTER

Date: 5-17-94

PLEASE DELIVER THE FOLLOWING PAGES TO:

Name: JEFF ELLS
Firm: Allied Signal Aerospace
Address:

Fax: 201-393-6553
Telephone:

FROM:

Name: JOANN KOHL
Firm: Marisol Incorporated
Department: Environmental / Data Processing
Address: 125 Factory Lane
Middlesex, New Jersey 08846
Telephone: (908) 469 - 5100
Fax: (908) 469 - 2761

We sent 5 pages including the cover letter.

Thank you!

Per your request please find LDR's for both manifest No.'s NJA0996964 + NJA09969 received by Marisol on 06/08
I have mailed you hard co

Joann Kohl.

a:\storage\envirec\fxcovlt.xls

125 Factory Lane
Middlesex, N.J. 08846

This notice is being sent to you in accordance with 40 CFR 268.7 to inform you that this shipment contains the solvents identified below which are restricted from landfill. You should be aware that the residues from the treatment of these materials may not be landfilled unless the concentration is below the applicable non-wastewater treatment standard(s).

Manifest contains the following EPA Hazardous Waste Numbers: (check box(es))

F001-> [X] F002-> [ ] F003-> [ ] F004-> [ ] F005-> [ ]

The following materials are contained in the waste stream:

	MATERIAL	NON-WASTEWATER TREATMENT STANDARD (mg/l)
	Acetone	0.590
	Benzene	3.700 (total)
	n-Butyl Alcohol	5.000
	Carbon Disulfide	4.810
	Carbon Tetrachloride	0.960
	Chlorobenzene	0.050
	Cresols (and Cresylic Acid)	0.750
	Cyclohexanone	0.750
	1,2 Dichlorobenzene	0.125
	2-Ethoxyethanol	Incineration
	Ethyl Acetate	0.750
	Ethyl Benzene	0.053
	Ethyl Ether	0.750
	Isobutanol	5.000
	Methanol	0.750
X	Methylene Chloride	0.960
	Methyl Ethyl Ketone	0.750
	Methyl Isobutyl Ketone	0.330
	Nitrobenzene	0.125
	2-Nitropropane	Incineration
	Pyridine	0.330
	Tetrachloroethylene	0.050
	Toluene	0.330
X	1,1,1-Trichloroethane	0.410
	1,1,2-Trichloroethane	7.600 (total)
X	1,1,2-Trichloro-1,2,2-Trifluoroethane	0.960
X	Trichloroethylene	0.091
	Trichlorofluoromethane	0.960
	Xylene	0.150

LAND DISPOSAL RESTRICTION NOTICE

In accordance with 40 CFR 268.7 this notice is to inform you that these wastes are restricted from land disposal unless they are treated: 1.) to below the treatment standards specified in 268.41 or 2.) in accordance with the technology-based standards defined in 268.42, namely, FSUBS (Fuel substitution), INCIN (Incineration) and/or RORGS (Recovery of organics).

The wastes are:

	D001		U080		U196
	D002		U083		U203
	U001		U084		U208
	U002		U085		U209
	U003		U088		U210
	U004		U092		U211
	U008		U102		U213
	U009		U107		U220
	U012		U108		U225
	U019		U110		U226
	U028		U112		U227
	U031		U113		U228
	U037		U117		U239
	U043		U118		U328
	U044		U121		U353
	U051		U122		U359
	U052		U124	X	D040
	U053		U125		
	U054		U140		
	U055		U152		
	U056		U154		
	U057		U159		
	U069		U161		
	U070		U162		
	U071		U169		
	U072		U171		
	U076		U186		
	U077		U188		
	U078		U191		
	U079		U194		

GENERATOR NOTIFIED

GENERATOR Allied Signal Aerospace MANIFEST No. NJA [redacted] 996961

SIGNATURE [signature] DATE 6/9/92

Marisol Incorporated
125 Factory Lane
Middlesex, N.J. 08846

This notice is being sent to you in accordance with 40 CFR 268.7 to inform you that this shipment contains the solvents identified below which are restricted from landfill. You should be aware that the residues from the treatment of these materials may not be landfilled unless the concentration is below the applicable non-wastewater treatment standard(s).

Manifest contains the following EPA Hazardous Waste Numbers: (check box(es))

F001-> [X] F002-> [ ] F003-> [ ] F004-> [ ] F005-> [ ]

The following materials are contained in the waste stream:

	MATERIAL	NON-WASTEWATER TREATMENT STANDARD (mg/l)
	Acetone	0.590
	Benzene	3.700 (total)
	n-Butyl Alcohol	5.000
	Carbon Disulfide	4.810
	Carbon Tetrachloride	0.960
	Chlorobenzene	0.050
	Cresols (and Cresylic Acid)	0.750
	Cyclohexanone	0.750
	1,2 Dichlorobenzene	0.125
	2-Ethoxyethanol	Incineration
	Ethyl Acetate	0.750
	Ethyl Benzene	0.053
	Ethyl Ether	0.750
	Isobutanol	5.000
	Methanol	0.750
	Methylene Chloride	0.960
	Methyl Ethyl Ketone	0.750
	Methyl Isobutyl Ketone	0.330
	Nitrobenzene	0.125
	2-Nitropropane	Incineration
	Pyridine	0.330
	Tetrachloroethylene	0.050
	Toluene	0.330
X	1,1,1-Trichloroethane	0.410
	1,1,2-Trichloroethane	7.600 (total)
	1,1,2-Trichloro-1,2,2-Trifluoroethane	0.960
	Trichloroethylene	0.091
	Trichlorofluoromethane	0.960
	Xylene	0.150

LAND DISPOSAL RESTRICTION NOTICE

In accordance with 40 CFR 268.7 this notice is to inform you that these wastes are restricted from land disposal unless they are treated: 1.) to below the treatment standards specified in 268.41 or 2.) in accordance with the technology-based standards defined in 268.42, namely, FSUBS (Fuel substitution), INCIN (Incineration) and/or RORGS (Recovery of organics).

The wastes are:

_____ D001	_____ U080	_____ U196
_____ D002	_____ U083	_____ U203
_____ U001	_____ U084	_____ U208
_____ U002	_____ U085	_____ U209
_____ U003	_____ U088	_____ U210
_____ U004	_____ U092	_____ U211
_____ U008	_____ U102	_____ U213
_____ U009	_____ U107	_____ U220
_____ U012	_____ U108	_____ U225
_____ U019	_____ U110	_____ U226
_____ U028	_____ U112	_____ U227
_____ U031	_____ U113	_____ U228
_____ U037	_____ U117	_____ U239
_____ U043	_____ U118	_____ U328
_____ U044	_____ U121	_____ U353
_____ U051	_____ U122	_____ U359
_____ U052	_____ U124	_____ _____
_____ U053	_____ U125	_____ _____
_____ U054	_____ U140	_____ _____
_____ U055	_____ U152	_____ _____
_____ U056	_____ U154	_____ _____
_____ U057	_____ U159	_____ _____
_____ U069	_____ U161	_____ _____
_____ U070	_____ U162	_____ _____
_____ U071	_____ U169	_____ _____
_____ U072	_____ U171	_____ _____
_____ U076	_____ U186	_____ _____
_____ U077	_____ U188	_____ _____
_____ U078	_____ U191	_____ _____
_____ U079	_____ U194	_____ _____

GENERATOR Allied Signal Aerospace MANIFEST No. MS NJA ~~0996946~~ 0996964

SIGNATURE [signature] DATE 6/8/92

AlliedSignal
AEROSPACE

FACSIMILE COVER SHEET

PLEASE DELIVER THE FOLLOWING PAGE(S) TO:

NAME: Jessica Gottlieb

FIRM: EPA

FAX NO: (212) 637-4437

FROM:

NAME: MARK SCHWIND

DEPT: ALLIEDSIGNAL ENVIRONMENTAL

EXT: 201-393-2452

FAX: 201-393-6553

MESSAGE: Here's the UDR's thanks Mark

TOTAL NO. OF PAGE(S) 7 **INCLUDING COVER SHEET.**

TRANSMITTED BY (INITIALS): MS **DATE:** 5/19/95

NOTE: IF ALL PAGES HAVE NOT BEEN PROPERLY RECEIVED, PLEASE CALL 201-393-2452 - MARK

LAND DISPOSAL RESTRICTION NOTICE

In accordance with 40 CFR 268.7 this notice is to inform you that these wastes are restricted from land disposal unless they are treated: 1.) to below the treatment standards specified in 268.41 or 2.) in accordance with the technology-based standards defined in 268.42, namely, FSUBS (Fuel substitution), INCIN (Incineration) and/or RORGS (Recovery of organics).

The wastes are:

	D001		U080		U196
X	D002		U083		U203
	U001		U084		U208
	U002		U085		U209
	U003		U088		U210
	U004		U092		U211
	U008		U102		U213
	U009		U107		U220
	U012		U108		U225
	U019		U110		U226
	U028		U112		U227
	U031		U113		U228
	U037		U117		U239
	U043		U118		U328
	U044		U121		U353
	U051		U122		U359
	U052		U124		
	U053		U125		
	U054		U140		
	U055		U152		
	U056		U154		
	U057		U159		
	U069		U161		
	U070		U162		
	U071		U169		
	U072		U171		
	U076		U186		
	U077		U188		
	U078		U191		
	U079		U194		

GENERATOR Allied Signal Aerospace MANIFEST No. [redacted] IL 3412239 wab

SIGNATURE William A Hooper DATE 6-22-92

Marisol Incorporated
125 Factory Lane
Middlesex, N.J. 08846

This notice is being sent to you in accordance with 40 CFR 268.7 to inform you that this shipment contains the solvents identified below which are restricted from landfill. You should be aware that the residues from the treatment of these materials may not be landfilled unless the concentration is below the applicable non-wastewater treatment standard(s).

Manifest contains the following EPA Hazardous Waste Numbers: (check box[es])

F001-> [X] F002-> [ ] F003-> [ ] F004-> [ ] F005-> [ ]

The following materials are contained in the waste stream:

	MATERIAL	NON-WASTEWATER TREATMENT STANDARD (mg/l)
	Acetone	0.590
	Benzene	3.700 (total)
	n-Butyl Alcohol	5.000
	Carbon Disulfide	4.810
	Carbon Tetrachloride	0.960
	Chlorobenzene	0.050
	Cresols (and Cresylic Acid)	0.750
	Cyclohexanone	0.750
	1,2 Dichlorobenzene	0.125
	2-Ethoxyethanol	Incineration
	Ethyl Acetate	0.750
	Ethyl Benzene	0.053
	Ethyl Ether	0.750
	Isobutanol	5.000
	Methanol	0.750
X	Methylene Chloride	0.960
	Methyl Ethyl Ketone	0.750
	Methyl Isobutyl Ketone	0.330
	Nitrobenzene	0.125
	2-Nitropropane	Incineration
	Pyridine	0.330
	Tetrachloroethylene	0.050
	Toluene	0.330
X	1,1,1-Trichloroethane	0.410
	1,1,2-Trichloroethane	7.600 (total)
X	1,1,2-Trichloro-1,2,2-Trifluoroethane	0.960
X	Trichloroethylene	0.091
	Trichlorofluoromethane	0.960
	Xylene	0.150

[illegible] Revised [illegible]

PLEASE REVIEW BOTH SIDES!

LAND DISPOSAL RESTRICTION NOTICE

In accordance with 40 CFR 268.7 this notice is to inform you that these wastes are restricted from land disposal unless they are treated: 1.) to below the treatment standards specified in 268.41 or 2.) in accordance with the technology-based standard defined in 268.42, namely, FSUBS (Fuel substitution), INCIN (Incineration) and/or RORGS (Recovery of organics).

The wastes are:

	D001		U080		U196
	D002		U083		U203
	U001		U084		U208
	U002		U085		U209
	U003		U088		U210
	U004		U092		U211
	U008		U102		U213
	U009		U107		U220
	U012		U108		U225
	U019		U110		U226
	U028		U112		U227
	U031		U113		U228
	U037		U117		U239
	U043		U118		U328
	U044		U121		U353
	U051		U122		U359
	U052		U124	X	D040
	U053		U125		
	U054		U140		
	U055		U152		
	U056		U154		
	U057		U159		
	U069		U161		
	U070		U162		
	U071		U169		
	U072		U171		
	U076		U186		
	U077		U188		
	U078		U191		
	U079		U194		

GENERATOR NOTIFIED

GENERATOR Allied Signal Aerospace MANIFEST No. NJA [redacted] 996961

SIGNATURE [signature] DATE 6/8/92

Marisol Incorporate
125 Factory Lane
Middlesex, N.J. 08846

This notice is being sent to you in accordance with 40 CFR 268.7 to inform you that this shipment contains the solvents identified below which are restricted from landfill. You should be aware that the residues from the treatment of these materials may not be landfilled unless the concentration is below the applicable non-wastewater treatment standard(s).

Manifest contains the following EPA Hazardous Waste Numbers: (check box(es))

F001-> [X] F002-> [ ] F003-> [ ] F004-> [ ] F005-> [ ]

The following materials are contained in the waste stream:

	MATERIAL	NON-WASTEWATER TREATMENT STANDARD (mg/l)
	Acetone	0.590
	Benzene	3.700 (total)
	n-Butyl Alcohol	5.000
	Carbon Disulfide	4.810
	Carbon Tetrachloride	0.960
	Chlorobenzene	0.050
	Cresols (and Cresylic Acid)	0.750
	Cyclohexanone	0.750
	1,2 Dichlorobenzene	0.125
	2-Ethoxyethanol	Incineration
	Ethyl Acetate	0.750
	Ethyl Benzene	0.053
	Ethyl Ether	0.750
	Isobutanol	5.000
	Methanol	0.750
	Methylene Chloride	0.960
	Methyl Ethyl Ketone	0.750
	Methyl Isobutyl Ketone	0.330
	Nitrobenzene	0.125
	2-Nitropropane	Incineration
	Pyridine	0.330
	Tetrachloroethylene	0.050
	Toluene	0.330
X	1,1,1-Trichloroethane	0.410
	1,1,2-Trichloroethane	7.800 (total)
	1,1,2-Trichloro-1,2,2-Trifluoroethane	0.960
	Trichloroethylene	0.091
	Trichlorofluoromethane	0.960
	Xylene	0.150

[illegible] NOTICE

In accordance with 40 CFR 268.7 this notice is to inform you that these wastes are restricted from land disposal unless they are treated: 1.) to below the treatment standards specified in 268.41 or 2.) in accordance with the technology-based standards defined in 268.42, namely, FSUBS (Fuel substitution), INCIN (Incineration) and/or RORGS (Recovery of organics).

The wastes are:

_____ D001	_____ U080	_____ U196
_____ D002	_____ U083	_____ U203
_____ U001	_____ U084	_____ U208
_____ U002	_____ U085	_____ U209
_____ U003	_____ U088	_____ U210
_____ U004	_____ U092	_____ U211
_____ U008	_____ U102	_____ U213
_____ U009	_____ U107	_____ U220
_____ U012	_____ U108	_____ U225
_____ U019	_____ U110	_____ U226
_____ U028	_____ U112	_____ U227
_____ U031	_____ U113	_____ U228
_____ U037	_____ U117	_____ U239
_____ U043	_____ U118	_____ U328
_____ U044	_____ U121	_____ U353
_____ U051	_____ U122	_____ U359
_____ U052	_____ U124	_____ _____
_____ U053	_____ U125	_____ _____
_____ U054	_____ U140	_____ _____
_____ U055	_____ U152	_____ _____
_____ U056	_____ U154	_____ _____
_____ U057	_____ U159	_____ _____
_____ U069	_____ U161	_____ _____
_____ U070	_____ U162	_____ _____
_____ U071	_____ U169	_____ _____
_____ U072	_____ U171	_____ _____
_____ U076	_____ U186	_____ _____
_____ U077	_____ U188	_____ _____
_____ U078	_____ U191	_____ _____
_____ U079	_____ U194	_____ _____

GENERATOR Allied Signal Aerospace MANIFEST No. MA ~~0996996~~ 096964

SIGNATURE [signature] DATE 6/8/92

Allied Signal Aerospace Company

Manifest Doc No.: 1 0 0 0 9

Site Number: 3 3 6 2 5

State Manifest No.: NJA 0996947

1. Is this waste a non-wastewater or a wastewater? (See 40 CFR 268.2) Check ONE: ☒ Non-Wastewater ☐ Wastewater

2. If this waste is subject to any California List restrictions enter the letter from below (either A, B1, or B2) next to each restriction that is applicable: _____HOCs, _____PCBs, _____Acid, _____Metals, _____Cyanides.

3. Identify ALL USEPA hazardous waste codes that apply to this waste shipment, as defined by 40 CFR 261. For each waste code, identify the corresponding subcategory, or check NONE if the waste code has no subcategory. Also check which treatment standards apply. Spent solvent and California List treatment standards are listed on the back of this form. If F039, multi-source leachate applies, these standards must be attached by the generator.

REF #	4. US EPA HAZARDOUS WASTE CODE(S)	5. SUBCATEGORY ENTER THE SUBCATEGORY DESCRIPTION IF NOT APPLICABLE SIMPLY CHECK NONE		6. APPLICABLE TREATMENT STANDARDS		7. HOW MUST THE WASTE BE MANAGED ENTER THE LETTER FROM BELOW
				6.a - PERFORMANCE-BASED: CHECK AS APPLICABLE	6.b - SPECIFIED TECHNOLOGY: IF APPLICABLE ENTER THE 40 CFR 268.42 TABLE 1 TREATMENT CODE(s)	
		DESCRIPTION	NONE	268.41(a) 268.43(a)	268.42(a)	
1	F-006		X	X X		A
2						
3						
4						
5						
6						
7						
8						
9						
10						

To list additional USEPA waste code(s) and subcategory(s), use the supplemental sheet provided (CWM-2008-B) and check here: ☐

HOW MUST THE WASTE BE MANAGED? In column 7 above, enter the letter (A, B1, B2, B3, C, or D) below that describes how the waste must be managed to comply with the land disposal regulations (40 CFR 268.7). Please understand that if you enter the letter B1, B2, B3, or D, you are making the appropriate certification as provided below.

A. RESTRICTED WASTE REQUIRES TREATMENT

This waste must be treated to the applicable treatment standards set forth in 40 CFR Part 268 Subpart D, 268.32, or RCRA Section 3004(d).

B.1 RESTRICTED WASTE TREATED TO PERFORMANCE STANDARDS

"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based upon my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the performance levels specified in 40 CFR part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d) without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."

B.2 RESTRICTED WASTES FOR WHICH THE TREATMENT STANDARD IS EXPRESSED AS A SPECIFIED TECHNOLOGY (AND THE WASTE HAS BEEN TREATED BY THAT TECHNOLOGY)

"I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.42. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

B.3 GOOD FAITH ANALYTICAL CERTIFICATION - FOR INCINERATED ORGANICS

"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the nonwastewater organic constituents have been treated by incineration in units operated in accordance with 40 CFR Part 264 Subpart O or Part 265 Subpart O, or by combustion in fuel substitution units operating in accordance with applicable technical requirements, and I have been unable to detect the nonwastewater organic constituents despite having used best good faith efforts to analyze for such constituents. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

C. RESTRICTED WASTE SUBJECT TO A VARIANCE

This waste is subject to a national capacity variance, a treatability variance, or a case-by-case extension. Enter the effective date of prohibition in column 7 above.

D. RESTRICTED WASTE CAN BE LAND DISPOSED WITHOUT FURTHER TREATMENT

"I have determined that this waste meets all applicable treatment standards set forth in 40 CFR Part 268 Subpart D, and all applicable prohibition levels set forth in Section 268.32 or RCRA Section 3004(d), and therefore, can be land disposed without further treatment. A copy of all applicable treatment standards and specified treatment methods is maintained at the treatment, storage and disposal facility named above. "I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d). I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting false certification, including the possibility of a fine and imprisonment."

I hereby certify that all information submitted in this and all associated documents is complete and accurate, to the best of my knowledge and information.

Signature Mary Bellanca Title ENV. ENGINEER Date 3-18-92

5/15 (98)

AlliedSignal
AEROSPACE

FACSIMILE COVER SHEET

PLEASE DELIVER THE FOLLOWING PAGE(S) TO:

NAME: Ms Jessica Gottlieb

FIRM: USEPA

FAX NO: (212) 637-4437

FROM:

NAME: MARK SCHWIND

DEPT: ALLIEDSIGNAL ENVIRONMENTAL

EXT: 201-393-2452

FAX: 201-393-6553

MESSAGE:

TOTAL NO. OF PAGE(S) 3 INCLUDING COVER SHEET.

TRANSMITTED BY (INITIALS): DATE:

NOTE: IF ALL PAGES HAVE NOT BEEN PROPERLY RECEIVED, PLEASE CALL 201-393-2452 - MARK

AlliedSignal
AEROSPACE

AlliedSignal Inc.
Guidance & Control Systems
Teterboro, NJ 07608-1173

201 288 2000

United States Environmental Protection Agency
Hazardous Waste Compliance Branch
Region II
290 Broadway
22nd Floor
New York, New York 10007-1866

May 15, 1995

Attn: Ms Jessica Gottlieb

Re: AlliedSignal Aerospace
EPA ID. No: NJD078714433
Request for AlliedSignal Aerospace Response Letter to EPA dated, March 8, 1995

Dear Ms Gottlieb:

Please find enclosed a copy of AlliedSignal Aerospace's response letter to the Environmental Protections Agencies letter, dated February 21, 1995, concerning the missing LandBan Disposal Notifications.

I apologize for the delay in responding to your request, however due to business realignment, I was unable to respond sooner.

Please be advised, that as part of AlliedSignal Aerospace Manifest program it will be the responsibility of the person signing the Manifest to ensure that all the proper paper has been obtained for the file. It is believed, that upon photocopying the manifest that the person signing did not ensure that he had obtained all the necessary file documentation.

AlliedSignal Aerospace thanks the Agency for it's cooperation in this matter and if there are any questions, please do not hesitate to contact the undersigned at 201-393-2452.

Sincerely,

Mark S. Schwind
Staff Environmental Engineer

AlliedSignal
AEROSPACE

AlliedSignal Inc.
Guidance & Control Systems
Teterboro, NJ 07608-1173

201 288 2000

U.S. EPA, Region II
290 Broadway
New York, NY 10007-1866

8 March 1995

Dear Sirs:

AlliedSignal Aerospace, EPA ID # NJD078714433, regrets that it neglected to include copies of four land disposal restrictions in its Hazardous Waste Manifest files for 1992, as noted in an EPA letter dated 21 February 1995.

In order to correct this error, we have procurred these LDR's and incorporated them into our files. Attached are copies of manifests NJA 0996947, NJA 0996961, NJA 0996964, and ILO 3412239, and the LDR for each.

We hope that this action satisfies the Agency in regard to the noted violation of 40 C.F.R. Part 268. If you have any further questions or comments, please contact the undersigned. Thank you.

Sincerely,

Daniel P. White
Environmental Scientist

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: September 10, 2013 - 1:36 PM

Version 5.0

User Selection Criteria

Location:	New Jersey, all activities	**Activity Location:**	None Chosen
Handler ID:	NJD078714433	**Group of IDs:**	None Chosen
Handler Name:			
Handler Universe:	All Facilities Regardless of Universe		
Determined Date Range:	From: 10/01/1980 To: 09/10/2013		
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:9 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, ccitation3, hreport_univ5, lu_citation, lu_state, hid_groups
Libraries:	none

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: September 10, 2013 - 1:36 PM

TETERBORO LANDING LLC County Name / Code: BERGEN / NJ003 **NJD078714433**

Location: 699 RTE 46 EAST; TETERBORO, NJ 07608 **REGION 02**

Mailing: 301 RTE 17 NORTH SUITE 204; RUTHERFORD, NJ 07070

Activity Location: NJ State District: NORTHERN 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 Wrkld: 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

[redacted] Activity Location: NJ Type: 262.A Determined Date: 04/28/1998 Determined by Agency: State Responsible Agency: State
Scheduled Compliance Date: 05/05/1998 Actual Compliance Date: 05/11/1998 RTC Qualifier: OBSERVED Sequence Number: 4

CSE Evaluation 05/11/1998 Activity Location: NJ By: State Identifier: 000 Person: NJFA Branch: N Found Violation: YES
Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:

CEI Evaluation 04/28/1998 Activity Location: NJ By: State Identifier: 000 Person: NJFA Branch: N Found Violation: YES
Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:

Enforcement: Activity Location: NJ Type: 310 Action Date: 08/03/1999 Identifier: 000
Docket: Agency: State Responsible Person: NJFA Branch: N
Penalty Information: Proposed: Final Monetary: $4,500 Collected: $4,500 Total Final: $4,500
CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

Enforcement: Activity Location: NJ Type: 210 Action Date: 05/22/1998 Identifier: 000
Docket: Agency: State Responsible Person: NJFA Branch: N
Penalty Information: Proposed: $4,500 Final Monetary: Collected: Total Final:
CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

Enforcement: Activity Location: NJ Type: 120 Action Date: 04/28/1998 Identifier: 000
Docket: Agency: State Responsible Person: NJFA Branch: N
CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

[redacted] Activity Location: NJ Type: 262.A Determined Date: 04/28/1998 Determined by Agency: State Responsible Agency: State
Scheduled Compliance Date: 05/05/1998 Actual Compliance Date: 05/11/1998 RTC Qualifier: OBSERVED Sequence Number: 5

CSE Evaluation 05/11/1998 Activity Location: NJ By: State Identifier: 000 Person: NJFA Branch: N Found Violation: YES
Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:

CEI Evaluation 04/28/1998 Activity Location: NJ By: State Identifier: 000 Person: NJFA Branch: N Found Violation: YES
Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:

Enforcement: Activity Location: NJ Type: 310 Action Date: 08/03/1999 Identifier: 000
Docket: Agency: State Responsible Person: NJFA Branch: N
Penalty Information: Penalty Information Printed Above
CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

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

TETERBORO LANDING LLC, NJD078714433, TETERBORO, NJ, continued -

Enforcement: Activity Location: NJ Type: 210 Action Date: 05/22/1998 Identifier: 000
Docket: Agency: State Responsible Person: NJFA Branch: N
Penalty Information: Penalty Informatipe Printed Above
CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

Enforcement: Activity Location: NJ Type: 120 Action Date: 04/28/1998 Identifier: 000
Docket: Agency: State Responsible Person: NJFA Branch: N
CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

[redacted] Activity Location: NJ Type: 262.A Determined Date: 04/28/1998 Determined by Agency: State Responsible Agency: State
Scheduled Compliance Date: 05/05/1998 Actual Compliance Date: 05/11/1998 RTC Qualifier: OBSERVED Sequence Number: 6

CSE Evaluation 05/11/1998 Activity Location: NJ By: State Identifier: 000 Person: NJFA Branch: N Found Violation: YES
Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:

CEI Evaluation 04/28/1998 Activity Location: NJ By: State Identifier: 000 Person: NJFA Branch: N Found Violation: YES
Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:

Enforcement: Activity Location: NJ Type: 310 Action Date: 08/03/1999 Identifier: 000
Docket: Agency: State Responsible Person: NJFA Branch: N
Penalty Information: Penalty Information Printed Above
CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

Enforcement: Activity Location: NJ Type: 210 Action Date: 05/22/1998 Identifier: 000
Docket: Agency: State Responsible Person: NJFA Branch: N
Penalty Information: Penalty Information Printed Above
CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

Enforcement: Activity Location: NJ Type: 120 Action Date: 04/28/1998 Identifier: 000
Docket: Agency: State Responsible Person: NJFA Branch: N
CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

[redacted] Activity Location: NJ Type: 262.A Determined Date: 12/07/1989 Determined by Agency: State Responsible Agency: State
Scheduled Compliance Date: 01/14/1990 Actual Compliance Date: 01/30/1990 RTC Qualifier: OBSERVED Sequence Number: 2

CEI Evaluation 12/07/1989 Activity Location: NJ By: State Identifier: 017 Person: R2DEP Branch: Found Violation: YES
Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:

Enforcement: Activity Location: NJ Type: 120 Action Date: 12/15/1989 Identifier: 002
Docket: Agency: State Responsible Person: R2DEP Branch:
CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

[redacted] Activity Location: NJ Type: 262.A Determined Date: 12/07/1989 Determined by Agency: State Responsible Agency: State
Scheduled Compliance Date: 01/14/1990 Actual Compliance Date: 01/30/1990 RTC Qualifier: OBSERVED Sequence Number: 3

CEI Evaluation 12/07/1989 Activity Location: NJ By: State Identifier: 017 Person: R2DEP 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.

TETERBORO LANDING LLC, NJD078714433, TETERBORO, NJ, continued -

Enforcement: Activity Location: NJ | Type: 120 | Action Date: 12/15/1989 | Identifier: 002
Docket: | Agency: State | Responsible Person: R2DEP | Branch:
CA Component: N | Disposition Status: | Appeal Initiated: | Appeal Resolved:

[redacted] Activity Location: NJ | Type: 262.A | Determined Date: 07/19/1985 | Determined by Agency: State | Responsible Agency: State
Scheduled Compliance Date: 09/23/1985 | Actual Compliance Date: 02/25/1986 | RTC Qualifier: OBSERVED | Sequence Number: 1

NRR Evaluation 07/19/1985 | Activity Location: NJ | By: State | Identifier: 008 | Person: | Branch: | Found Violation: YES
Citizen Complaint: NO | Multimedia Inspection: NO | Sampling: NO | Not Subtitle C: NO | Day Zero: | Focus Area:

Enforcement: Activity Location: NJ | Type: 120 | Action Date: 09/09/1985 | Identifier: 001
Docket: | Agency: State | Responsible Person: R2DEP | Branch:
Penalty Information: Proposed: $1,500 | Final Monetary: $1,500 | Collected: | Total Final: $1,500
CA Component: N | Disposition Status: | Appeal Initiated: | Appeal Resolved:

Evaluations With No Violations:

CDI Evaluation 01/12/2010 | Activity Location: NJ | By: State | Identifier: 001 | Person: COMES | Branch: N | Found Violation: NO
Citizen Complaint: NO | Multimedia Inspection: NO | Sampling: NO | Not Subtitle C: NO | Day Zero: 01/12/2010 | Focus Area:

CEI Evaluation 09/15/2008 | Activity Location: NJ | By: State | Identifier: 001 | Person: NOMM | Branch: N | Found Violation: NO
Citizen Complaint: NO | Multimedia Inspection: NO | Sampling: NO | Not Subtitle C: NO | Day Zero: 09/15/2008 | Focus Area:

CEI Evaluation 06/21/2006 | Activity Location: NJ | By: State | Identifier: 001 | Person: NOSDS | Branch: N | Found Violation: NO
Citizen Complaint: NO | Multimedia Inspection: NO | Sampling: NO | Not Subtitle C: NO | Day Zero: 06/21/2006 | Focus Area:

CEI Evaluation 07/30/2003 | Activity Location: NJ | By: State | Identifier: 001 | Person: NOJAD | Branch: N | Found Violation: NO
Citizen Complaint: NO | Multimedia Inspection: NO | Sampling: NO | Not Subtitle C: NO | Day Zero: | Focus Area:

CEI Evaluation 06/27/2001 | Activity Location: NJ | By: State | Identifier: 001 | Person: NOMM | Branch: N | Found Violation: NO
Citizen Complaint: NO | Multimedia Inspection: NO | Sampling: NO | Not Subtitle C: NO | Day Zero: | Focus Area:

SNN Evaluation 05/12/1998 | Activity Location: NJ | By: State | Identifier: 001 | Person: NOFA | Branch: N | Found Violation: NO
Citizen Complaint: NO | Multimedia Inspection: NO | Sampling: NO | Not Subtitle C: NO | Day Zero: | Focus Area:

SNN Evaluation 05/11/1998 | Activity Location: NJ | By: State | Identifier: CV3 | Person: | Branch: | Found Violation: NO
Citizen Complaint: NO | Multimedia Inspection: NO | Sampling: NO | Not Subtitle C: NO | Day Zero: | Focus Area:

SNY Evaluation 04/29/1998 | Activity Location: NJ | By: State | Identifier: 000 | Person: NJFA | Branch: N | Found Violation: N/A
Citizen Complaint: NO | Multimedia Inspection: NO | Sampling: NO | Not Subtitle C: NO | Day Zero: | Focus Area:

SNY Evaluation 04/28/1998 | Activity Location: NJ | By: State | Identifier: CNV | Person: | Branch: | Found Violation: N/A
Citizen Complaint: NO | Multimedia Inspection: NO | Sampling: NO | Not Subtitle C: NO | Day Zero: | Focus Area:

CEI Evaluation 03/20/1996 | Activity Location: NJ | By: State | Identifier: 000 | Person: NJML | Branch: M | Found Violation: NO
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.

TETERBORO LANDING LLC, NJD078714433, TETERBORO, NJ, continued -

CDI Evaluation	02/28/1995	Activity Location: NJ	By: EPA	Identifier: 000	Person: R2KB	Branch: RCB	Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
CEI Evaluation	03/30/1994	Activity Location: NJ	By: State	Identifier: 000	Person: NJBM	Branch: M	Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
NRR Evaluation	01/30/1990	Activity Location: NJ	By: State	Identifier: 018	Person: R2DEP	Branch:	Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
NRR Evaluation	01/13/1987	Activity Location: NJ	By: State	Identifier: 015	Person: R2DEP	Branch:	Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
FCI Evaluation	10/21/1986	Activity Location: NJ	By: State	Identifier: 016	Person: R2DEP	Branch:	Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area: V3
FRR Evaluation	07/28/1986	Activity Location: NJ	By: State	Identifier: 014	Person: R2DEP	Branch:	Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
NRR Evaluation	06/09/1986	Activity Location: NJ	By: State	Identifier: 012	Person: R2DEP	Branch:	Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
NRR Evaluation	04/17/1986	Activity Location: NJ	By: State	Identifier: 011	Person: R2DEP	Branch:	Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
FRR Evaluation	04/04/1986	Activity Location: NJ	By: State	Identifier: 013	Person: R2DEP	Branch:	Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
CEI Evaluation	02/28/1986	Activity Location: NJ	By: State	Identifier: 010	Person: R2DEP	Branch:	Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
NRR Evaluation	11/07/1985	Activity Location: NJ	By: State	Identifier: 009	Person: R2DEP	Branch:	Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
NRR Evaluation	11/20/1984	Activity Location: NJ	By: State	Identifier: 007	Person:	Branch:	Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
NRR Evaluation	09/02/1984	Activity Location: NJ	By: State	Identifier: 006	Person:	Branch:	Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
NRR Evaluation	03/28/1984	Activity Location: NJ	By: State	Identifier: 004	Person:	Branch:	Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
NRR Evaluation	03/08/1984	Activity Location: NJ	By: State	Identifier: 003	Person:	Branch:	Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
NRR Evaluation	03/05/1984	Activity Location: NJ	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:

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

TETERBORO LANDING LLC, NJD078714433, TETERBORO, NJ, continued -

NRR Evaluation 03/02/1984 Activity Location: NJ By: State Identifier: 001 Person: Branch: Found Violation: NO
Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:

NRR Evaluation 01/17/1984 Activity Location: NJ By: State Identifier: 005 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: NJ Type: 120 Action Date: 02/24/1995 Identifier: 000
Docket: Agency: EPA Responsible Person: R2JWG Branch: RCB
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 opted 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 flee 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
CDI	CASE DEVELOPMENT INSPECTION
CEI	COMPLIANCE EVALUATION INSPECTION ON-SITE
CSE	COMPLIANCE SCHEDULE EVALUATION
FCI	FOCUSED COMPLIANCE INSPECTION
FRR	FINANCIAL RECORD REVIEW
NRR	NON-FINANCIAL RECORD REVIEW
SNN	NOT A SIGNIFICANT NON-COMPLIER
SNY	SIGNIFICANT NON-COMPLIER

Focus Area	Description

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

Description of codes used on the report:

V3	CONVERTED FROM V2 RCRAINFO

Enforcement Type	Enforcement Description
120	WRITTEN INFORMAL
210	INITIAL 3008(A) COMPLIANCE
310	FINAL 3008(A) COMPLIANCE ORDER

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

Sites Teterboro Bergen County NJ

RCRARep Handler List - 3 liner

Report run on: September 4, 2013 4:03 PM

Name/ID/Dist	Location Address	Contact Information	Receipt Date	Regulated Activities	
430 INDUSTRIAL AVENUE		**A IACHETTA (201)438-5110**	**01/01/07-Imp**		
NJD089749279	430 INDUSTRIAL AVE	430 INDUSTRIAL AVE	03/30/82-Not		
NORTHERN	TETERBORO NJ 07608	TETERBORO NJ 07608			
711 CODI CORP		**CARL KRAJEWSKI (201)288-7645**	**08/07/12-Imp**		
NJN986633378	233 INDUSTRIAL AVE	233 INDUSTRIAL AVE	07/31/12-Not		
NORTHERN	TETERBORO NJ 07608	TETERBORO NJ 07608			
AGFA CORPORATION		**CHARLENE T GRAFF (201)373-4613**	**01/01/07-Imp**	CG	------
NJD002171189	195 NORTH STREET	195 NORTH STREET	01/04/99-Not		
NORTHERN	TETERBORO NJ 07608	TETERBORO NJ 07608			
AIRWICK INDUSTRIES INC			**01/01/07-Imp**		
NJD070951256	380 NORTH ST	111 COMMERCE RD	10/11/84-Not		
NORTHERN	TETERBORO NJ 07608-1204	CARLSTADT NJ 07072			
ALLIED SIGNAL AEROSPACE CO			**01/01/07-Imp**		
NJD986622439	7 MALCOLM DR	RTE 46 M C 3 19B	12/04/91-Not		
NORTHERN	TETERBORO NJ 07608	TETERBORO NJ 07608			
AMERICAN BUSINESS AVIATION			**01/01/07-Imp**		
NJD982729998	200 FRED WHERAN DR	200 FRED WHERAN DR	04/12/89-Not		
NORTHERN	TETERBORO NJ 07608-1112	TETERBORO NJ 07608			
ASHLAND CHEMICAL CO		**TERRI WECKENBROCK (614)889-3826**	**01/01/07-Imp**		
NJD981185622	120 NORTH ST	PO BOX 2219	11/14/94-Not		
NORTHERN	TETERBORO NJ 07608	COLUMBUS OH 43216-2219			
ATLANTIC AVIATION CORP		**BILL MULLEN 2012881740 3877**	**10/10/12-Not**	**LG**	------
NJD012308988	233 INDUSTRIAL AVE	233 INDUSTRIAL AVE	11/24/80-Not		
NORTHERN	TETERBORO NJ 07608	TETERBORO NJ 07608	03/01/81-PtA		
AVIALL			**01/01/07-Imp**		
NJD986600633	500A INDUSTRIAL AVE	500A INDUSTRIAL AVE	01/18/91-Not		
NORTHERN	TETERBORO NJ 07608	TETERBORO NJ 07608			
BECTON DICKINSON CORP AIRCRAFT			**01/01/07-Imp**		
NJD986590090	150 FRED WEHRAN DR	150 FRED WEHRAN DR	05/18/90-Not		
NORTHERN	TETERBORO NJ 07608	TETERBORO NJ 07608			
BERGEN COUNTY VOCATIONAL TECH SCHOOL			**01/01/07-Imp**	CG	------
NJD013445267	RTE 46 & CENTRAL AVE	200 HACKENSACK AVE	11/04/85-Not		
NORTHERN	TETERBORO NJ 07608	HACKENSACK NJ 07601			
BOMBARDIER AEROSPACE		**KIM J CLARK (972)720-2668**	**01/01/07-Imp**		
NJR000034553	150 FRED WEHRAN DR.	401 INDUSTRIAL AVENUE HANGER 15	04/16/01-Not		
NORTHERN	TETERBORO NJ 07608	TETERBORO NJ 07608			
BOMBARDIER AEROSPACE		**KIM CLACK (972)720-2668**	**01/01/07-Imp**		
NJR000061333	401 INDUSTRIAL AVE HANGER 15	401 INDUSTRIAL AVE HANGER 15	03/16/06-Not		
NORTHERN	TETERBORO NJ 07608	TETERBORO NJ 07608			

RCRARep Handler List - 3 liner

Report run on: September 4, 2013 4:03 PM

Name/ID/Dist	Location Address	Contact Information	Receipt Date	Regulated Activities
CHEVRON TEXACO FUEL STORAGE FACILITY		**JOSEPH FAZIO 2012881740 1902**	**01/01/07-Imp**	
NJD986566511	MALCOM & INDUSTRIAL AVE	233 INDUSTRIAL AVE	11/13/06-Not	
NORTHERN	TETERBORO NJ 07608	TETERBORO NJ 07608		
CONTRACT APPLICATIONS INC		**LINDA FHROUS (612)541-8783**	**01/01/07-Imp**	
NJD986596500	107 CHARLES A LINDBERGH DR	1111 DOUGLAS DR N	11/09/90-Not	
NORTHERN	TETERBORO NJ 07608	MINNEAPOLIS NJ 55422		
CRANE CARRIER CO			**01/01/07-Imp**	
NJD076684984	150 CENTRAL AVE	150 CENTRAL AVE	01/04/85-Not	
NORTHERN	TETERBORO NJ 07608-1192	TETERBORO NJ 07608		
CROLL REYNOLDS CO INC			**01/01/07-Imp**	
NJD986568822	90 HOLISTER RD	PO BOX 668 751 CENTRAL AVE	10/25/88-Not	
NORTHERN	TETERBORO NJ 07608-1119	WESTFIELD NJ 07091		
CUBIC PRECISION			**01/01/07-Imp**	
NJD981177173	25 CENTRAL AVE	25 CENTRAL AVE	12/06/85-Not	
NORTHERN	TETERBORO NJ 07608	TETERBORO NJ 07608		
CUSTOM AIRCRAFT INTERIORS INC		**ROBERT VARVERS (201)288-9050**	**01/01/07-Imp**	
NJD011309192	333 INDUSTRIAL AVE	333 INDUSTRIAL AVE	08/18/88-Not	
NORTHERN	TETERBORO NJ 07608	TETERBORO NJ 07608		
CYANAMID AIR TRANSPORT DIVISION		**JOHN LANGSCHULTZ (201)288-3895**	**01/01/07-Imp**	
NJ0000003210	455 INDUSTRIAL AVE	455 INDUSTRIAL AVE	09/27/93-Not	
NORTHERN	TETERBORO NJ 07608-1043	TETERBORO NJ 07608-1043		
DREW INDUSTRIAL DIV			**01/01/07-Imp**	
NJR000035447	120 NORTH ST NE COR	1 DREW PLZ	07/17/95-Not	
NORTHERN	TETERBORO NJ 07608	BOONTON NJ 07005		
EXECUTIVE JET		**TOM POMPA (201)807-0035**	**01/01/07-Imp**	
NJ0000136523	121A BILLY DIEHL RD	121A BILLY DIEHL RD	03/04/94-Not	
NORTHERN	TETERBORO NJ 07608	TETERBORO NJ 07608		
EXECUTIVE JET MGMT			**01/01/07-Imp**	
NJD986573004	199 INDUSTRIAL AVE	199 INDUSTRIAL AVE	02/02/90-Not	
NORTHERN	TETERBORO NJ 07608-1050	TETERBORO NJ 07608		
EXXON CO USA 32007			**01/01/07-Imp**	
NJD986607745	RTE 46 E & INDUSTRIAL AVE	PO BOX 4415	10/29/90-Not	
NORTHERN	TETERBORO NJ 07608	HOUSTON NJ 77210		
EXXON STORAGE FACILITY			**01/01/07-Imp**	CG ------
NJD981131675	MALCOLM AVE	PO BOX 66	08/26/85-Not	
NORTHERN	TETERBORO NJ 07608	LINDEN NJ 07036		
FALCON JET CORP			**01/01/07-Imp**	
NJD981491509	113 BILLY DIEHL RD	TETERBORO ARPRT	07/22/86-Not	
NORTHERN	TETERBORO NJ 07608	TETERBORO NJ 07608		

RCRARep Handler List - 3 liner

Report run on: September 4, 2013 4:03 PM

Name/ID/Dist	Location Address	Contact Information	Receipt Date	Regulated Activities	
FIRST AVIATION SERVICES		**ROBERT DESTEFANO (201)288-3555**	**01/01/07-Imp**		
NJD981564743	111 INDUSTRIAL AVE	111 INDUSTRIAL AVE	12/30/98-Not		
NORTHERN	TETERBORO NJ 07608-1050	TETERBORO NJ 07608			
FLIGHT OPTIONS LLC		**PAUL ALEXANDER 2014402890 18**	**07/16/07-Imp**	**SG**	------
NJR000066555	119 BILLY DIEHL RD	119 BILLY DIEHL RD	07/17/07-Not		
NORTHERN	TETERBORO NJ 07608	TETERBORO NJ 07608			
FLIGHTPATH SERVICES INC		**EARL L LIGHTMAN (856)428-9850**	**01/01/07-Imp**	**CG**	------
NJR000047308	500 HOLLISTER RD	500 HOLLISTER RD	09/24/03-Not		
NORTHERN	TETERBORO NJ 07608	TETERBORO NJ 07608			
FORD MOTOR CO NEW YORK PARTS D C		**W E STEWART (609)395-6501**	**01/01/07-Imp**		
NJD000729639	US HWY 46	280 PROSPECT PLAINS ROAD	08/18/80-Not		
NORTHERN	TETERBORO NJ 07608	CRANBURY NJ 08512			
G T E PRODUCTS CORP			**01/01/07-Imp**		
NJD039657903	1000 HULYER ST	1000 HULYER ST	02/25/86-Not		
NORTHERN	TETERBORO NJ 07608-1142	TETERBORO NJ 07608			
GRAPHIC ARTS BUILDING CO			**01/01/07-Imp**		
NJD076684869	375 NORTH ST	375 NORTH ST	03/19/93-Not		
NORTHERN	TETERBORO NJ 07608	TETERBORO NJ 07608			
GREAT BEAR SPRING CO			**01/01/07-Imp**		
NJD981075476	RTE 46 & HOLLISTER RD	RTE 46 & HOLLISTER RD	03/29/85-Not		
NORTHERN	TETERBORO NJ 07608	TETERBORO NJ 07608			
GREAT BEAR SPRINGS CO			**01/01/07-Imp**		
NJD068205295	RTE 46 & HOLLISTER RD	RTE 46 & HOLLISTER RD	08/20/93-Not		
NORTHERN	TETERBORO NJ 07608	TETERBORO NJ 07608			
GREIF BROS CORP		**LEROY HUBLER (201)288-1600**	**01/01/07-Imp**	**CG**	------
NJD980208136	MALCOLM AVE	MALCOLM AVE	02/03/87-Not		
NORTHERN	TETERBORO NJ 07608	TETERBORO NJ 07608			
HARCO INDUSTRIES INC			**01/01/07-Imp**		
NJD986631323	350 NORTH ST	350 NORTH ST	10/22/93-Not		
NORTHERN	TETERBORO NJ 07608	TETERBORO NJ 07608			
HARNISCHFEGER CORP			**01/01/07-Imp**		
NJD069289726	100 NORTH ST	PO BOX 1788	10/29/84-Not		
NORTHERN	TETERBORO NJ 07608-1202	TETERBORO NJ 07608			
HEATHER HILL SPORTSWEAR CO INC			**01/01/07-Imp**		
NJD072799463	200 GREEN ST	200 GREEN ST PO BOX 2284	11/30/89-Not		
NORTHERN	TETERBORO NJ 07608-1208	TETERBORO NJ 07608			
HENRY I SIEGEL CO INC		**NICK FERN (201)288-4029**	**01/01/07-Imp**		
NJ0000044560	333 INDUSTRIAL AVE	333 INDUSTRIAL AVE	11/03/93-Not		
NORTHERN	TETERBORO NJ 07608-1022	TETERBORO NJ 07608-1022			

RCRARep Handler List - 3 liner

Report run on: September 4, 2013 4:03 PM

Name/ID/Dist	Location Address	Contact Information	Receipt Date	Regulated Activities	
JET AVIATION BUSINESS PORT AUTH NY & NJ			**01/01/07-Imp**		
NJD981177181	HANGER 118	90 MOONACHIE AVE	12/09/85-Not		
NORTHERN	TETERBORO NJ 07608	TETERBORO NJ 07608			
JET AVIATION TETERBORO/PORT AUTH NY & NJ		**ROBERT HOEHNE (201)288-8400**	**01/01/07-Imp**	CG	------
NJD982743197	HANGERS 111 & 109 & 17	111 LINDBERGH DR	06/23/89-Not		
NORTHERN	TETERBORO NJ 07608	TETERBORO NJ 07608			
JOHN S SWIFT CO OF NJ INC			**01/01/07-Imp**		
NJD986634046	RTE 46 W	RTE 46 W	06/01/92-Not		
NORTHERN	TETERBORO NJ 07608	TETERBORO NJ 07608			
KERRY INGREDIENTS		**JOHN MANTONE (732)882-0202**	**05/02/12-Not**		
NJR000019786	546 RT 46	546 RT 46	05/29/97-Not		
NORTHERN	TETERBORO NJ 07608	TETERBORO NJ 07608			
KEUFFEL & ESSER CO			**01/01/07-Imp**		
NJD000729814	25 CENTRAL AVE	BOX 800 FORD RD	08/18/80-Not		
NORTHERN	TETERBORO NJ 07608-1116	ROCKAWAY NJ 07866			
KLATSKIN CHARLES			**01/01/07-Imp**		
NJD982736589	150 NORTH ST	400 HOLLISTER RD	05/05/89-Not		
NORTHERN	TETERBORO NJ 07608-1202	TETERBORO NJ 07608			
L-3 COMMUNICATIONS SPACE & NAV		**ROBERT SHANNON (973)446-4070**	**01/01/07-Imp**		
NJR000035113	699 RTE 46 E	699 RTE 46 E	08/30/01-Not		
NORTHERN	TETERBORO NJ 07608-1173	TETERBORO NJ 07608-1173			
LABORATORY RESOURCES			**01/01/07-Imp**	CG	------
NJD982185407	100 HOLLISTER RD	100 HOLLISTER RD	12/14/92-Not		
NORTHERN	TETERBORO NJ 07608	TETERBORO NJ 07608			
MEDLINK IMAGING LLC		**KELVIN MENA 8004567800 120**	**06/27/13-Not**	LQ	------
NJR986637205	295 NORTH ST	295 NORTH ST			
NORTHERN	TETERBORO NJ 07608	TETERBORO NJ 07608			
MERCK SHARP & DOHME - NY BRANCH		**JAMES MCGINNIS (201)288-2275**	**01/01/07-Imp**		
NJD000632265	111 CENTRAL AVE	111 CENTRAL AVE	08/12/80-Not		
NORTHERN	TETERBORO NJ 07608	TETERBORO NJ 07608			
MERCK SHARP & DOHME DIV OF MERCK			**01/01/07-Imp**		
NJD005903463	111 CENTRAL AVE	PO BOX 2000	08/18/80-Not		
NORTHERN	TETERBORO NJ 07608-1123	RAHWAY NJ 07065	11/19/80-PtA		
MILLION AIR			**01/01/07-Imp**		
NJD986572113	485 INDUSTRIAL AVE	485 INDUSTRIAL AVE	12/11/89-Not		
NORTHERN	TETERBORO NJ 07608-1044	TETERBORO NJ 07608			
NATIONAL DISTILLERS & CHEMICAL CORP			**01/01/07-Imp**		
NJD982716623	TETERBORO AIRPORT HANGAR 16	233 INDUSTRIAL AVE HANGAR 4	10/25/88-Not		
NORTHERN	TETERBORO NJ 07608	TETERBORO NJ 07608			

RCRARep Handler List - 3 liner

Report run on: September 4, 2013 4:03 PM

Name/ID/Dist	Location Address	Contact Information	Receipt Date	Regulated Activities	
NATIONAL DISTILLERS&CHEM.CORP			**01/01/07-Imp**		
NJD010952562	HANGAR 16 RISER RD	BOX 1747	08/24/84-Not		
NORTHERN	TETERBORO NJ 07608	SOUTH HACKENSACK NJ 07628			
NAZ DAR - KC EAST INC			**01/01/07-Imp**		
NJD986644649	20 HENRY ST	20 HENRY ST	12/30/92-Not		
NORTHERN	TETERBORO NJ 07608-1102	TETERBORO NJ 07608-1102			
NAZ-DAR/KC EAST INC			**01/01/07-Imp**		
NJD986583482	430 INDUSTRIAL AVE	430 INDUSTRIAL AVE	06/04/90-Not		
NORTHERN	TETERBORO NJ 07608	TETERBORO NJ 07608			
P N A AVIATION CORP			**01/01/07-Imp**		
NJD070952882	120 BILLY DIEHL RD	120 BILLY DIEHL RD	08/18/83-Not		
NORTHERN	TETERBORO NJ 07608-1001	TETERBORO NJ 07608			
PARTY RENTAL LTD		**RON F FROST (201)727-4754**	**03/06/08-Imp**	**SG**	------
NJD081696129	275 NORTH ST	275 NORTH ST	03/07/08-Not		
NORTHERN	TETERBORO NJ 07608	TETERBORO NJ 07608			
PARTY RENTAL LTD.			**01/01/07-Imp**		
NJD075429241	400 NORTH ST	400 NORTH ST	12/19/88-Not		
NORTHERN	TETERBORO NJ 07608-1215	TETERBORO NJ 07608			
PORT AUTH OF NY & NJ HELI MAINT FAC			**01/01/07-Imp**	**CG**	------
NJD982181992	121B BILLY DIEHL RD	121B BILLY DIEHL RD	04/30/87-Not		
NORTHERN	TETERBORO NJ 07608-1001	TETERBORO NJ 07608			
POTDEVIN MACHINE CO		**DAVID CALVERT (732)747-9111**	**01/01/07-Imp**		
NJD001270560	200 NORTH ST	26 FAIRFIELD PL	05/21/01-Not		
NORTHERN	TETERBORO NJ 07608	WEST CALDWELL NJ 07006			
PRIME ENVELOPE CORP		**DAVID MARTINEZ (201)329-6200**	**01/01/07-Imp**	**CG**	------
NJR000030595	526 RTE 46 W	526 RTE 46 W	09/10/99-Not		
NORTHERN	TETERBORO NJ 07608	TETERBORO NJ 07608			
PROFESSIONAL AIRCRAFT COMPLETION CO		**FREDDIE SANTIAGO (201)931-0400**	**01/01/07-Imp**	**CG**	------
NJR000055665	90 MOONACHIE AVE	90 MOONACHIE AVE	01/19/06-Not		
NORTHERN	TETERBORO NJ 07608	TETERBORO NJ 07608			
QUEST DIAGNOSTICS		**GEORGE M GARDE (201)393-5669**	**05/31/13-Not**	**LG**	------
NJD093843258	1 MALCOLM AVE	1 MALCOLM AVE	10/02/81-Not		
NORTHERN	TETERBORO NJ 07608	TETERBORO NJ 07608			
REICHHOLD CHEMICALS INC			**01/01/07-Imp**		
NJD986616738	120 NORTH ST	PO BOX 13582	10/01/91-Not		
NORTHERN	TETERBORO NJ 07608	RESEARCH TRIANGLE PARK NJ 27709			
RICHARD CATENA AUTO WHOLESALERS INC		**RICHARD CATENA (201)329-6262**	**09/18/12-Not**	**LG**	------
NJR986634343	430 INDUSTRIAL AVE	430 INDUSTRIAL AVE			
NORTHERN	TETERBORO NJ 07608	TETERBORO NJ 07608			

RCRARep Handler List - 3 liner

Report run on: September 4, 2013 4:03 PM

Name/ID/Dist	Location Address	Contact Information	Receipt Date	Regulated Activities
SENTIENT CO NJR000071456 NORTHERN	200 FRED WEHRAN DR TETERBORO NJ 07608	**MYRNA C PEREZ (201)298-2731** 200 FRED WEHRAN DR TETERBORO NJ 07608	**05/27/08-Imp** 05/28/08-Not	SG ------
SIGNATURE FLIGHT SUPPORT NJD011310083 NORTHERN	401 INDUSTRIAL AVE TETERBORO NJ 07608-1006	**ALFRED M RABASCA 2012881880 4056** 401 INDUSTRIAL AVE TETERBORO NJ 07608-1006	**12/09/07-Imp** 12/10/07-Not	CG ------
SMURFIT-STONE CONTAINER CORPORATION NJD123731345	200 HOLLISTER ROAD TETERBORO NJ 07608-0000	**ROBERT T WOOD (770)570-1606**	**08/22/08-BRS** 11/25/85-Not	LG ------
SONY AVIATION INC NJR986636991 NORTHERN	177 INDUSTRIAL AVE TETERBORO NJ 07608	**MAURO MANZI (201)288-5021** 90 MOONACHIE AVE TETERBORO NJ 07608	**06/04/13-Not**	CG ------
SUMITOMO MACHINERY CORP OF AMERICAN NJD002994507 NORTHERN	7 MALCOLM AVE TETERBORO NJ 07608-1011	7 MALCOLM AVE TETERBORO NJ 07608	**01/01/07-Imp** 01/19/83-Not	
SUN CHEMICAL CORP-KOHL & MADDEN DIVISION NCD000632299 NORTHERN	500 INDUSTRIAL AVE TETERBORO NJ 07608	**MICHAEL N DECLARIO 2012889505 7101** 500 INDUSTRIAL AVE TETERBORO NJ 07608	**01/01/07-Imp** 05/30/06-Not 11/19/80-PtA	SG ------
SUPERIOR PRINTING INK CO INC NJR986634087 NORTHERN	100 NORTH ST TETERBORO NJ 07608	**PETER MIZEREK (201)478-5600** 100 NORTH ST TETERBORO NJ 07608	**08/29/12-Not**	CG ------
SYMRISE NJD070570122 NORTHERN	300 NORTH ST TETERBORO NJ 07608	**SALVATORE M CASCONE (800)422-1559** 300 NORTH ST TETERBORO NJ 07608	**04/26/12-Not** 10/31/85-Not	LG ------
TAKASAGO INTERNATIONAL CORP NJD103729125 NORTHERN	100 GREEN ST TETERBORO NJ 07608	**CURTIS W CRUMHOLT (201)750-6348** 4 VOLVO DR ROCKLEIGH NJ 07647	**04/18/12-Not** 12/05/86-Not	LG ------
TETERBORO LANDING LLC NJD078714433 NORTHERN	699 RTE 46 EAST TETERBORO NJ 07608	**ANDY KOLB (609)409-2122** 1 CAPITAL DR SUITE 103 CRANBURY NJ 08512	**05/26/10-Not** 06/18/80-Not 11/19/80-PtA	LG ------
TEXACO INC AVIATION DIVISION NJD084015452 NORTHERN	177 INDUSTRIAL AVE TETERBORO NJ 07608	**BILL MULLA 201-288-1740** 233 INDUSTRIAL AVENUE TETERBORO NJ 07608	**04/07/08-Imp** 07/21/80-Not	
TOYODA MACHINERY USA INC NJD981486448 NORTHERN	30-32 HENRY ST TETERBORO NJ 07608-1102	30-32 HENRY ST TETERBORO NJ 07608	**01/01/07-Imp** 06/06/86-Not	
USPS - NNJ METRO MAINTENANCE SUPPORT NJR000052829 NORTHERN	200 INDUSTRIAL AVE TETERBORO NJ 07699-9998	**WALTER J BOUDREAUX (201)375-4166** 200 INDUSTRIAL AVE TETERBORO NJ 07699-9998	**01/01/07-Imp** 03/18/05-Not	CG ------

RCRARep Handler List - 3 liner

Report run on: September 4, 2013 4:03 PM

Name/ID/Dist	Location Address	Contact Information	Receipt Date	Regulated Activities
VAN DUSEN AIRCRAFT SUPPLIES			**01/01/07-Imp**	
NJD084017078	TETERBORO AIRPORT	TETERBORO AIRPORT	12/22/86-Not	
NORTHERN	TETERBORO NJ 07608	TETERBORO NJ 07608		
WALLACE MACHINE TOOL			**01/01/07-Imp**	
NJD001666973	600 HOLLISTER RD	600 HOLLISTER RD	10/15/84-Not	
NORTHERN	TETERBORO NJ 07608-1184	TETERBORO NJ 07608		
WELLA CORP			**01/01/07-Imp**	
NJD982538027	125 NORTH ST	524 GRAND AVE	06/06/88-Not	
NORTHERN	TETERBORO NJ 07608	ENGLEWOOD NJ 07631		