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

Henry G. Williams
Commissioner

April 2, 1985

Mr. Robert C. Zittel
Purchasing Agent
Hasbrouck Plastics, Inc.
P.O. Box 504
Hamburg, NY 14075

Dear Mr. Zittel:

Re: Reclassification of Facility, EPA Identification No. NYD002100469

This confirms receipt by this office of closure plan revisions, dated March 20, 1985, with respect to reclassification of the above referenced facility. The revisions will be attached to your January 4, 1985 submission as an addendum.

Upon review, the closure plan, with addendum, is deemed adequate and reclassification of the facility to generator-only status, as of this date, is approved, pending any further inspection. You should note that as a generator-only, hazardous wastes at the facility should never, in the future, be stored for more than 90 days. Please note also that this approval in no way precludes your responsibility to submit a closure certification as noted in the closure plan when the facility closes in the future.

C1106-6
Corr 09
5/16/85
CP

Further, to terminate your facility's interim status, an official formal request to withdraw the Part A application submitted for the subject facility should be made, in writing, to the United States Environmental Protection Agency (USEPA). Upon receipt of this request, the USEPA will then publish a Notice of Intent to deny the RCRA Part B application for your facility. Following the required comment period for this notice, you will be notified by the USEPA insofaras termination of your facility's interim status.

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

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

with carbon copies to:

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

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

Mr. Robert Mitrey
Regional Solid Waste Engineer
600 Delware Avenue
Buffalo, NY 14202

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

Sincerely,

John L. Middelkoop P.E.

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

cc: R. Baker
J. Reidy
R. Mitrey

HASBROUCK
PLASTICS, INC.
P.O. BOX ~~504~~ 120
HAMBURG, N.Y. 14075

(716) 627-2371

April 8, 1985

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

REF: Reclassification of Facility,
EPA Identification #NYD002100469

Dear Mr. Baker:

As per instructions from Mr. John L. Middlekoop, P.E., I am hereby formally requesting that your department withdraw the Part A application submitted, thereby terminating our interm status for our facility.

Corr 05 5/16/85 LD

Please contact me @ 716-627-2371 should you or your staff require any further information.

We are looking forward to having this subject settled and thank you in advance for your attention concerning this matter.

Very truly yours,

HASBROUCK PLASTICS, INC.

Robert C. Zittel

Robert C. Zittel
Purchasing Agent

RCZ/bc
cc: Mr. James Reidy
Mr. John Middlekoop
Mr. Robert Mitrey

HASBROUCK
PLASTICS, INC.
P.O. BOX 504
HAMBURG, N.Y. 14075

(716) 627-2371

October 27, 1983

New York State
Department of Environmental Conservation
Regulatory Fee Determination Unit
Room 109
50 Wolf Road
Albany, New York 12233-0001

Ref: EPA ID No. NYD0002100469

Gentlemen:

In accordance with your instructions, we hereby formally request a Declassification in the Status of our Company.

Attached is Fee Recalculation Request Form, along with copies of all pertinent forms and correspondence to document our request for this Declassification.

If you require any further information, please advise.

Very truly yours,

HASBROUCK PLASTICS, INC.

James R. Pfeffer

James R. Pfeffer
Plant Superintendent

/rom
Enclosures

cc - U.S. EPA - Ernest A. Regna, Chief, Solid Waste Branch
Richard A. Baker, Chief, Permits Admn. Branch

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
REGULATORY FEE DETERMINATION UNIT
ROOM 109, WOLF ROAD, ALBANY, NEW YORK 12233-0001

FEE RECALCULATION REQUEST FORM

Part I - Program Fee Category Information

I believe the following Environmental Regulatory Program Fee is incorrect.

_____	Air Quality Control Program Fee	- Complete Parts II and VI
XXX	Hazardous Waste Program Fee	- Complete Parts III and VI
_____	Waste Transporter Program Fee	- Complete Parts IV and VI
_____	SPDES Program Fee	- Complete Parts V and VI

Company Name: HASBROUCK PLASTICS, INC.

Address: P. O. BOX 120

HAMBURG, NEW YORK 14075

Invoice Number: 276114320000
(From Bill)

Part II - Air Quality Control Information

1. The Department's fee assessment of $_____ is incorrect. My records indicate the correct amount should be $_____.

2. Please list the Source I.D. number(s) for which you believe you have been incorrectly billed and briefly state your reasons.

_____

_____

_____

_____

Part III - Hazardous Waste Program Fee

NOTE: This is only a challenge of the estimated bill. At the end of the fiscal year, the generator/facility must file a certification of the actual quantities and activities generated, handled or utilized during the fiscal year. This certification will be an automatic request for redetermination of the amount owed by the facility.

1. The Department's fee assessment of $ 6,000.00 is incorrect. My records indicate the correct amount should be $ -0-.

2. Please fill in the following sections as you believe your fee liability exists.

A. Generator Fee (For all generators of hazardous waste)

Fee Schedule - Based on the estimated total quantity of hazardous waste projected to be generated during the State fiscal year (April 1, 1983 - March 31, 1984)

_____	From 15 tons to 100 tons per fiscal year	$ 500.00
_____	From greater than 100 tons to 500 tons per fiscal year	3000.00
_____	From greater than 500 tons to 1000 tons per fiscal year	10000.00
_____	Greater than 1000 tons per fiscal year	20000.00

TOTAL ESTIMATED GENERATOR FEE $ -0- **

** Approximately 2500 lbs. of Acetone Sludge is generated per year which is disposed of at Cecos International, Inc., Niagara Falls, New York.

B. Treatment, Storage and Disposal Facility Fee (For facilities subject to permitting under [Part 360])

Amount

i. Base Facility Fees
(Calculated on the estimated total quantity of hazardous waste to be handled [treated, stored or disposed] in facilities subject to permitting)

_____	0 to 100 tons per fiscal year	$ 6000.00	_____
_____	1000 + tons per fiscal year	15000.00	_____

ii. Special Facility Fees

1. Landfills (per facility)

_____	Not Generator Owned	$100,000.00	_____
_____	Generator Owned	50,000.00	_____

2. Incinerators

_____	Incinerator Units at $5000 per unit	_____

3. Energy Recovery Facilities

_____	Energy Recovery Units burning any listed hazardous waste at $5000 per unit	_____

4. Surface Impoundments (Per facility)

_____	Surface Impoundment used for treatment storage, or disposal at $12,000	_____

TOTAL ESTIMATED FACILITY FEE $ -0-

TOTAL ESTIMATED HAZARDOUS WASTE REGULATORY PROGRAM FEE -0-
(add Total Estimated Generator and Facility Fees from 2A and 2B)

3. Please attach documentary evidence in support of this claim and describe its content below.

Attached are copies of all reports, letters, etc., from our Mr. Robert C. Zittel pertaining to this permit. At the time we originally applied for this permit, we felt it would be cheaper for us to transport this sludge material to the disposal site rather than have Cecos come out to our plant to pick it up. However, we found that our industrial waste amounted to such a small amount that on 9-28-82, our Mr. Zittel notified the NYS EPA office that we would not be renewing our permit and Cecos would pick up at our facility. As can be readily seen, we are clearly a small generator and as such we are not subject to this liability assessment.

Part IV - Waste Transporter Program

1. My waste Transporter Permit is for a (check one):

   ☐ industrial-commercial ☐ other

2. The Department's fee assessment of $_____ is incorrect. My records indicate the correct amount should be $_____.

3. Please list the license plate numbers of the vehicles for which you believe you should be billed.

   _____

   _____

   _____

4. Please attach documentary evidence in support of this claim and describe its content below.

   _____

   _____

   _____

Part V - State Pollutant Discharge Elimination System Program Permit Information

1. My SPDES permit is for a (check one):

   _____P/C/I Facility _____Industrial facility

   _____Municipal facility _____Power Plant

2. The Department's fee assessment of $_____ is incorrect. My records indicate the correct amount should be $_____.

3. The daily discharge, as determined by the Department is _____g.p.d.

4. I believe it should be _____ g.p.d. for the following reasons:

   _____

   _____

   _____

5. Please attach documentary evidence in support of this claim and describe its content below.

   _____

   _____

   _____

Part VI - Submittal Instructions

- This request must be received by the Department within 30 business days of the Department's invoice.

- Unless you have already remitted payment to the Department, include your billing invoice along with payment as follows:

  1. $ 6,000.00 Total Fee Assessed (From Billing Invoice)
  2. $ 6,000.00 Total Fee Disputed
  3. $ -0- Undisputed Amount (Subtract line 2 from line 1)
  4. Divide line 3 by 3, record the amount here $ -0- , and include payment for this amount.

- If the final resolution of the dispute results in your still being liable for the disputed amount or portion of this amount, interest and penalty will be assessed as provided in the statute and Department regulations. To avoid penalties and interest, remit payment as indicated on the billing invoice.

- This request should be sent to:

  NYS Department of Environmental Conservation
  Regulatory Fee Determination Unit
  Room 109
  50 Wolf Road
  Albany, New York 12233-0001

Certification

I hereby affirm under penalty of perjury that the information provided in this form and attached statements and exhibits is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

Signature *	Date 10-27-83
Type or Print Name James R. Pfeffer	
Title Plant Superintendent	Phone 716-627-2371

* This request must be signed by the facility operator or his/her designated representative. The designated representative shall be the plant manager, plant superintendent, or a person of an equivalent level of responsibility.

HASBROUCK
PLASTICS, INC.
P.O. BOX 504 /210
HAMBURG, N.Y. 14075

(716) 627-2371

February 10, 1983

Mr. Joseph Cvinar
Grants Administration Branch
Office of Policy and Management
U.S. Environmental Protection Agency
26 Federal Plaza
New York, NY 10278

Dear Mr. Cvinar:

This is in regards to Mr. Conrad Simon's letter dated January 31, 1983 stating Hasbrouck Plastics is in violation of 40CFR-265.143. and 40CFR-265.147..

I believe there has been a mistake made regarding the classification which under Hasbrouck Plastics should be put.

We are not an operator of a hazaradous waste facility, but that of a small generator, manufacturing Fiberglass Reinforced Plastic equipment for the corrosion-control industry employing 21 Production workers.

At the time I filed a Generator's Report in August of 1980, we did have in our storage area 15 - 55 gallon drums of Acetone Wash, a by-product generated from our manufacturing process. This had been collected and stored at our site over a two/three year period. When enough of it was accumulated, it was then taken to Newco Chemical Waste Systems for proper disposal.

With manufacturing and disposal costs increasing each year, an acetone recovery machine was purchased at the end of August, 1980 to reclaim and recycle this acetone wash for reuse in our plant. The machine performed so well that another recovery machine was purchased in November of the same year.

Eighty percent of the acetone recycled from the machines is reused in our plant, leaving a twenty percent acetone sludge residue, which comes out of the machines in a liquid and hardens into a solid state. Because it would take more than 90 days to reclaim and recycle these drums of acetone wash, in addition to what we were using in the plant, a Part A permit application was filed for on November 17, 1980 for storage of these drums at our plant. At present we have accumulated a few drums of this hardened residue since 1980 for future off-site disposal.

With regards to our insurance, we feel we have a sufficient amount. Our liability insurance covers up to One Million dollars for damages incurred by the two small machines.

I have attempted to show that Hasbrouck Plastics is not in violation as we have tried to follow every possible step for State and Federal complience. Should you or your staff have any questions, please contact me at (716) 627-2371. Thank you for your attention to this matter.

Very truly yours,

HASBROUCK PLASTICS, INC.

Robert C. Zittel

Robert C. Zittel
Purchasing Agent

RCZ/

HASBROUCK
PLASTICS, INC.
P. O. BOX 504
HAMBURG, N. Y. 14075

OMB#: 2050-0005 Expires: 1-31-83

1981 STATUS SHEET FOR NON-REGULATED GENERATORS

INSTRUCTIONS: THIS SHEET MUST BE COMPLETED ONLY BY INSTALLATIONS THAT NOTIFIED EPA OF HAZARDOUS WASTE ACTIVITY UNDER SECTION 3010 OF RCRA BUT DID NOT HANDLE REGULATED QUANTITIES OF HAZARDOUS WASTE AT ANY TIME DURING 1981 AND ARE NOT REQUIRED TO COMPLETE THE 1981 GENERATOR ANNUAL REPORT. If you received a preprinted label attached to the envelope in which this form was enclosed, affix it in the space provided, circle the appropriate code in section S-IV, sign the certification at the bottom of this page and return it to your EPA Regional Office by January 10, 1983 in the return envelope provided. If any of the information on the label is incorrect, draw a line through it and provide the correct information in the appropriate section below. If you did not receive a preprinted label, complete all sections.

NYD002100469 02 GF

HASBROUCK PLASTICS, INC.
ATTN: ZITTEL ROBERT PURCHASING AGT.
~~PO BOX 504~~ -1975 LAKEVIEW RD.
HAMBURG NY 14075

S-I. GENERATOR'S EPA I.D. NUMBER

T/A C

F 1

1 2 13 14 15

S-II. NAME OF FACILITY

30 69

S-III. FACILITY MAILING ADDRESS

3 PO BOX 1120

15 16 45

Street or P.O. Box

4

15 16 41 42 47 51

City or Town State Zip Code

S-IV. 1981 STATUS (Circle the code at right which best describes your installation's 1981 status. Circle only one code)

a. NON-HANDLER—did not handle hazardous waste in any quantity in 1981 1

b. SMALL QUANTITY GENERATOR—did not generate more than 1000 kg. of hazardous waste (or 1 kg. of acutely hazardous waste) in any single month or accumulate more than 1000 kg. of hazardous waste (or 1 kg. of acutely hazardous waste) on-site at any time during 1981 (40 CFR §261.5) 2

c. EXEMPT—all wastes generated in farming operations (40 CFR §262.51) or exempt pursuant to 40 CFR §261.4 4

d. BENEFICIAL USE—All hazardous waste generated was beneficially used, reused, or recycled in accordance with 40 CFR §261.2 and 40 CFR §261.6 5

e. CLOSED—installation was closed prior to 1981 9

S-V. CERTIFICATION

I certify under penalty of law that the installation identified above did not handle regulated quantities of hazardous waste during 1981 and that to the best of my knowledge this installation is not subject to the RCRA Annual Reporting requirement.

Robert C. Zittel, Purchasing Agent, Robert C. Zittel 1/6/83

Print/Type Name Title Signature of Authorized Representative Date Signed

Do not make entries in shaded areas

OMB#: 2050-0005 Expires: 1-31-83

ENVIRONMENTAL PROTECTION AGENCY

FACILITY ANNUAL HAZARDOUS WASTE REPORT

This report is for the calendar year ending December 31, 1982

PEEL HERE

NYD002100469

HASBROUCK PLASTICS INC
~~PO BOX 504~~
HAMBURG NY 14075

Please print/type with elite type (12 characters per inch)

GENERAL INSTRUCTIONS: If you received a preprinted label attached to the mailing envelope in which this form was enclosed, affix it in the space provided. If any of the information on the label is incorrect, draw a line through it and provide the correct information in the appropriate section below. If the information is correct and complete, leave Sections I, II, and III below blank. If you did not receive a preprinted label, complete all sections. REFER TO THE SPECIFIC INSTRUCTIONS CONTAINED IN THIS BOOKLET BEFORE COMPLETING THIS FORM. The information requested in this report is required by law (Section 3004 of the Resource Conservation Recovery Act).

MAIL TO:

NYS-DEC
TSD Annual Report
P.O. Box 15628
Albany, New York 12212

I. FACILITY EPA I.D. NUMBER

T/A C

F 1 (1–2, 13–15)

II. NAME OF FACILITY

(30–69)

III. FACILITY MAILING ADDRESS

3 PO BOX 120 1975 LAKEVIEW ROAD (15–45)

Street or P.O. Box

4 (15–16)

City or Town

State (41–42) Zip Code (47–51)

IV. LOCATION OF FACILITY (if different than section III above)

5 (15–45)

Street or Route number

6 (15–16)

City or Town

State (41–42) Zip Code (47–51)

V. FACILITY CONTACT

2 ROBERT C. ZITTEL (15–45)

Name (last and first)

716-627-2371 (46–55)

Phone No. (area code & no.)

VI. COST ESTIMATES FOR FACILITIES

$ (16), (19), (22)

Cost Estimate for Facility Closure

$ (25), (28), (31)

Cost Estimate for Post Closure Monitoring and Maintenance (disposal facilities only)

VII. 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.

Print/Type Name	Title	Signature of Authorized Representative	Date Signed
Robert C. Zittel	Purchasing Agent	Robert C Zittel	February 25, 1983.

EPA Form 8700-13B(5-80) (Revised 10-82)

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Facility Annual Hazardous Waste Report (cont.)

This report is for the calendar year ending December 31, 1982

VIII. FACILITY'S EPA I.D. NO.

F (1–2) … (13–14) 1 (15) T/A C

Date received: _____

Received by: _____

IX. GENERATOR'S EPA I.D. NO.

G (16–28)

X. GENERATOR NAME (specify generator from whom all wastes on this page were received)

XI. GENERATOR ADDRESS

XII. WASTE IDENTIFICATION

Sequence # (29–32)	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions) (33–36, 37–40, 41–44, 45–48)	C. Handling Method (49–51)	D. Amount of Waste (52–60)	E. Unit of Measure (61)
	1					
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XIII. COMMENTS (enter information by section number—see instructions)

Hasbrouck Plastics, Inc. did not generate more than 1000 kg. of hazardous waste (or 1 kg. of acutely hazardous waste) in any single month or accumulate more than 1000 kg. of hazardous waste (or 1 kg. of acutely hazardous waste) on-site at any time during 1982.

September 28, 1982

Mr. David L. Archibald
Sanitary Engineer
New York State Department of
Environmental Conservation
50 Wolf Road
Albany, New York 12233

RE: Renewal of Industrial Waste Collector Permit

Dear Mr. Archibald:

As Hasbrouck Plastics, Inc. has not engaged in the hauling of quantities of industrial waste during the two (2) year period in which we have had our permit, number 9A-116, we have decided ~~and~~ not to renew it.

Very truly yours,

HASBROUCK PLASTICS, INC.

Robert C. Zittel
Purchasing Agent

RCZ/bc

Permit #9A-116 will expire on October 31, 1982.

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

SEPTIC TANK CLEANER & INDUSTRIAL WASTE COLLECTOR PERMIT

Permit No. 9A-116

Vehicle License No. GT-3161

THIS IS TO CERTIFY THAT:

Name of Permittee: Hasbrouck Plastics, Inc.

Name of Business:

Address: P.O. Box 120 1975 Lakeview Rd. City: Hamburg State: NY Zip Code: 14075

having complied with the provisions of Environmental Conservation Law, §27-0301, is hereby authorized to engage in septic tank cleaning or waste collecting within the State of New York in the manner described hereon.

This permit will expire on October 31, 1982 and is subject to revocation.
Permits are not transferable.

LANDS AND RECEIVING STATIONS APPROVED FOR DISPOSAL

Type of Waste	Location and Manner of Disposal
acetone still bottoms and ~~resin residue~~	CECOS International, Inc. Niagara Falls, NY

CONDITIONS: Additional sheet attached: ☐ Yes ☒ No

Receiving stations must comply with all State and local regulations.

In witness whereof, the Department of Environmental Conservation has caused this permit to be executed on this 26 day of October, 1981

By [signature]
New York State Department of Environmental Conservation Representative

47-20-3 (1/80)
Formerly 47-06-1

APPLICATION FOR SEPTIC TANK CLEANER AND INDUSTRIAL WASTE COLLECTOR PERMIT

Submit in TRIPLICATE

1. NAME OF BUSINESS	2. LOCATION WHERE VEHICLES ARE GARAGED	3. NO. OF VEHICLE
Hasbrouck Plastics, Inc.	1975 Lakeview Road, Hamburg, NY 14075	ONE

4. BUSINESS ADDRESS Street	City & State	Zip Code	Telephone No.	PERMIT NO.
PO Box 120 1975 Lakeview Road	Hamburg, New York	14075	627- *(716)2371	9A-116

5. VEHICLES	VEHICLE NO. 1	2	3	4	5	6
a. MAKE	FORD					
b. YEAR	1972					
c. COLOR	Blue					
d. LICENSE PLATE NO.	GT-3161					
e. STATE OF REGISTRATION	New York					
f. TYPE (Tank, open, etc.)	Stake Truck					
g. TANK CAPACITY	NA					

NOTE: For additional vehicles and/or information, please attach a supplemental sheet and check here ☐

6. PHYSICAL AND CHEMICAL CHARACTER OF WASTES HANDLED NOTE: If Industrial Wastes are handled, form SW-14 must also be completed.

Industrial Sludge - Waste Acetone Still Bottoms left over from our Acetone Recovery Machines.

Polyester Resin Residue - left over or generated from our Fiberglass Reinforced Plastic manufacturing process.

Less than 500 Gallons for the above.

7. LOCATION AND MANNER OF DISPOSAL

Cecos International, Inc.
PO Box 619
Niagara Falls Blvd. & Walmore Road
Niagara Falls, New York 14302

Sanitary Landfill

8. PLACE OR COMMUNITIES SERVED

Hasbrouck Plastics, Inc., 1975 Lakeview Road, Hamburg, New York 14075

9. Attach a map or sketch showing the disposal area of receiving station

10. Annual Permit Fee Attached ☐ Yes ☐ No

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

11. SIGNATURE OF APPLICANT	12. PRINTED OR TYPED NAME	13. DATE
	Robert C. Zittel	

STATEMENT OF OWNERS OR OPERATORS OF DISPOSAL AREAS OR RECEIVING STATIONS

Permission is hereby granted to the above named applicant to dump the material stated in this application at site(s) listed below subject to the Rules and Regulations of the Department of Environmental Conservation governing disposal of such material at the designated area.

NAME OF DISPOSAL SITE OR RECEIVING STATION (1)		NAME OF DISPOSAL SITE OR RECEIVING STATION (2)	
SIGNATURE	DATE	SIGNATURE	DATE

47-15-2 (11/79)

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

SEPTIC TANK CLEANER AND INDUSTRIAL WASTE COLLECTOR ANNUAL REPORT

PERMITTEE (Business Name): Hasbrouck Plastics, Inc.

PERMIT NO.: 9A-116

BUSINESS ADDRESS: PO Box 120, 1975 Lakeview Road, Hamburg, New York 14075

NUMBER OF INSTALLATIONS EMPTIED OR CLEANED DURING THE LAST CALENDAR YEAR: None

Fill in boxes below with the appropriate number of gallons of waste handled.

None

METHOD OF DISPOSAL

TYPE OF WASTE	A. Sewage Treatment Plant	B. Land Spreading	C. Sanitary Landfill	D. Lagooning	E. Incineration	F. Special Process	TOTAL
1. Septic tank or cesspool							
2. Marina holding tank or portable toilet							
3. Oil							
4. Sewage Treatment Plant Sludge							
5. Spent Chemicals							
6. Industrial Sludges			less than 500 Gal.				
7. Solvents							
8. Acids							
9. Animal Wastes							
10. Other (Specify)							
11. TOTAL							

12. IF SEPTIC TANK WASTES ARE DISPOSED OF AT A SEWAGE TREATMENT PLANT, IS THE WASTE INTRODUCED AT:

☐ trunk line ☐ plant influent ☐ sludge digester

13. IF SPECIAL PROCESSES (F.) ARE INDICATED, BRIEFLY DESCRIBE EACH PROCESS USED:

"I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

DATE	SIGNATURE

NOTE:
READ ALL INSTRUCTIONS BEFORE COMPLETING.

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

(Section 3010(a), Resource Conservation and Recovery Act of 1976, 42 USC 6930

EPA USE ONLY

NUMBER

COMPLETE ☐ YES ☐ NO

IDENTIFICATION

1. (a) Name of organization and place of operation Hasbrouck Plastics, Inc. Hamburg, New York 14075

(b) Mailing address and location of place of operation P.O. Box 504, 1975 Lakeview Road Hamburg, New York 14075

(c) Principal activity of person *(4-digit SIC number or written description)* Manufacturer of Fiberglass Reinforced Plastic Equipment for the Corrosion-Control Industry.

(d) Identification number NYD002100469 Source of identification number EPA ID Number

PRINCIPAL TECHNICAL CONTACT(S)

2. (a) Name(s) and telephone number(s) Charles E. Pfeffer - Sales Manager (716)627-2371 & (716)942-3781, Robert C. Zittel - Purchasing Agent (716)627-2371 & (716)-648-1971

(b) Address(es) *(Same order as names.)* 103 Depot Street, West Valley, NY 14171, 6469 Willow Drive, Hamburg, NY 14075

CERTIFICATION

I hereby certify that the information provided herein is complete and correct to the best of my knowledge. I understand that all information on this form may be made available to the public unless otherwise noted under item number 3. I am authorized to sign official documents for my organization.

3. (a) Robert C. Zittel (SIGNATURE) (b) Robert C. Zittel-P.A. (NAME AND TITLE *(Print or type)*) (c) 8-15-80 (DATE)

WASTE INFORMATION

4. Types of hazardous waste activities *(Check all applicable boxes and circle made of transport in part (b).)*

(a) XX Generate

(b) ☒ Transport-mode *(air, barge, rail, truck, other)*

(c) ☐ Treat/store/dispose *(at site of waste generation)*

(d) ☐ Treat/store/dispose *(other than at site of waste generation)*

5. Types of hazardous wastes handled, as identified by criteria under Section 3001 regulations. Does the place of operation generate, transport, treat, store or dispose of any hazardous wastes of the following types? *(Place an "X" in each appropriate box.)*

WASTE TYPE	YES	NO	WASTE TYPE	YES	NO	UNDETERMINED
(a) Ignitable	XX		(d) Radioactive			
(b) Reactive			(e) Corrosive			
(c) Infectious			(f) Toxic			

6. Description of hazardous waste handled as identified by listing under Section 3001 regulations, or by general type and specific contents using the best available information *(e.g., "wastewater treatment sludge containing lead compounds")*. Continue in the *"Additional Information"* section on page 2 if necessary.

Waste Acetone Wash

(CONTINUED ON PAGE 2)

7. Optional: Estimated amount of hazardous waste handled annually *(volume/year or weight/year, based on calendar year 1977)*.

CONFIDENTIALITY CLAIM

8. If you claim any information contained in items 5, 6 and 7 as confidential business information, indicate that below by putting an "X" in the appropriate box(es). Any information reported to EPA that is claimed as confidential will be treated in accordance with the confidentiality regulations in 40 CFR Part 2, Subject B.

NOTE: If you fail to assert a confidentiality claim, EPA may make this information available to the public without further notice to you.

☒ ITEM 5 ☒ ITEM 6 ☐ ITEM 7

WARNING

No hazardous waste, as defined under Section 3001 regulations, 42 USC 6921, may be transported, stored, treated, or disposed of unless notification of hazardous waste activity has been submitted to the EPA or authorized State authorities according to regulations promulgated under Section 3010, P.L. 94-580. Failure to comply with this regulation can result in civil and/or criminal penalties of as much as $25,000 a day for each day of violation. Any person who knowingly makes a false statement or representation in filing notification of hazardous waste activity shall, upon conviction, be subject to a fine of not more than $25,000, or to imprisonment not to exceed one year, or both.

ADDITIONAL INFORMATION

Please indicate the number of the item being referred to.

Item #6: Besides waste acetone wash, there is also solidified polyester, vinylester, and furan resin, cut-off scrap trimmings, fiberglass and mylar scraps. Except for the waste acetone wash, everything is non-toxic and non-biodegradable. It remains as permanent landfill.

RESPONDENT CONTACT RECORD (RCR)

FACILITY ID NUMBER	COMPANY NAME
NYD002100469	HASBROUCK PLASTICS INC.

COMPANY ADDRESS	CITY	STATE ABBREV.	ZIP CODE
	HAMBURG	NY	

CONTACT PERSON'S NAME/TITLE	TELEPHONE NUMBER (INCLUDE AREA CODE)
ROBERT ZITTEL	716 627-2371

CONTACT RECORD

DATE	CONTRACTOR'S INITIALS	ITEMS DISCUSSED/RESOLUTION
		lat/long, MAP, PHOTO, SIC
7/10/91	V.C.	will mail in. Mailed back early.
		Amendments made 7/24/91 VC

HASBROUCK PLASTICS

DATE RETURNED _____

REASON _____

|__| ACKNOWLEDGEMENT SENT

INTERNAL CHECKLIST ID #NYD002100469

Comp

Tat/Long SK

1. Interim Regulatory Requirements

A. (1) FORM 1 MISSING |__|

(2) FORM 3 MISSING |__|

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

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

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

D. (1) NON-NOTIFIER |X|

(2) NOTIFIED after AUGUST 18, 1980 |__| Valid |__|

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

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

2. A. HANDLER |__|

B. NONREGULATED |__|

C. UNSURE |__|

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

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

F. CORE ITEM(S) MISSING |__|

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

H. OTHER |__|

MISSING:

MAP |X|

DRAWING |__|

PHOTO |X|

AOK

HASBROUCK
PLASTICS, INC.
P.O. BOX 504
HAMBURG, N.Y. 14075

(716) 627-2371

US Environmental Protect. Agency/General Information
EPA Form 3510-1 [6-80]

In reference to Section XI which requires a topographic map of the area extending one mile beyond the property boundaries:

Please find attached a map showing our only production facility which is located at 1975 Lakeview Road in Hamburg, New York. Presently, we employ [24] production workers.

On the property is located one small area for storing our hazardous waste material in 55-gallon drums. This material is in a liquid - a gelled - and in a hardened state. When enough has accumulated, it is taken to "CECOS" International, Inc., located in Niagara Falls, New York - where it is properly disposed of.

We are not a large Company, but that of a small one. We have no injection wells, landfills, existing or proposed intake or discharge structures or disposal facilities on our property. Hasbrouck Plastics, Inc. does generate a hazardous material known as "Waste acetone wash" in a liquid form - but at the same time, we do treat the waste acetone by putting it through two acetone recovery machines, recently purchased; thus greatly reducing our hazardous waste to be disposed of.

We feel the map enclosed should be sufficient enough for the purposes intended.

SW-14 (1/76)

INDUSTRIAL WASTE COLLECTOR DETAIL FORM CONTINUATION

Name of Permittee	Date	Permit No.
Hasbrouck Plastics, Inc.		9A-116

Company Producing Waste (Name and Address)	Waste Type Code	Components	Physical State	Quantity per Year (Gallons)	Treatment or Disposal Facilit (Name and Address of Site)
Hasbrouck Plastics, Inc. 1975 Lakeview Road, Hamburg, New York 14075	4 & 6	Waste Acetone Still Bottoms	Sludge	less than 500 Gal.	Cecos International, Inc. PO Box 619, Niagara Falls, New York 14302
Hasbrouck Plastics, Inc. 1975 Lakeview Road, Hamburg, New York 14075	26	Polyester Resin Residues	Solid	less than 500 Gal.	Cecos International, Inc. PO Box 619, Niagara Falls, New York 14302

Eighty percent of the acetone recycled from the machines is reused in our plant, leaving a twenty percent acetone sludge residue, which comes out of the machines in a liquid and hardens into a solid state. Because it would take more than 90 days to reclaim and recycle these drums of acetone wash, in addition to what we were using in the plant, a Part A permit application was filed for on November 17, 1980 for storage of these drums at our plant. At present we have accumulated a few drums of this hardened residue since 1980 for future off-site disposal.

With regards to our insurance, we feel we have a sufficient amount. Our liability insurance covers up to One Million dollars for damages incurred by the two small machines.

I have attempted to show that Hasbrouck Plastics is not in violation as we have tried to follow every possible step for State and Federal complience. Should you or your staff have any questions, please contact me at (716) 627-2371. Thank you for your attention to this matter.

Very truly yours,

HASBROUCK PLASTICS, INC.

Robert C. Zittel

Robert C. Zittel
Purchasing Agent

RCZ/

HASBROUCK
PLASTICS, INC.
P. O. BOX ~~504~~ 120
HAMBURG, N. Y. 14075

HASBROUCK
PLASTICS, INC.
P.O. BOX 584 /120
HAMBURG, N.Y. 14075

NYD00210469

(716) 627-2371

February 10, 1983

Mr. Joseph Cvinar
Grants Administration Branch
Office of Policy and Management
U.S. Environmental Protection Agency
26 Federal Plaza
New York, NY 10278

Dear Mr. Cvinar:

This is in regards to Mr. Conrad Simon's letter dated January 31, 1983 stating Hasbrouck Plastics is in violation of 40CFR-265.143. and 40CFR-265.147..

I believe there has been a mistake made regarding the classification which under Hasbrouck Plastics should be put.

We are not an operator of a hazaradous waste facility, but that of a small generator, manufacturing Fiberglass Reinforced Plastic equipment for the corrosion-control industry employing 21 Production workers.

At the time I filed a Generator's Report in August of 1980, we did have in our storage area 15 - 55 gallon drums of Acetone Wash, a by-product generated from our manufacturing process. This had been collected and stored at our site over a two/three year period. When enough of it was accumulated, it was then taken to Newco Chemical Waste Systems for proper disposal.

With manufacturing and disposal costs increasing each year, an acetone recovery machine was purchased at the end of August, 1980 to reclaim and recycle this acetone wash for reuse in our plant. The machine performed so well that another recovery machine was purchased in November of the same year.

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

Form Approved OMB No. 158-R0175

04.

FORM 1 GENERAL

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

S F NYD002100469 T/A 3 C D

LABEL ITEMS	
I. EPA I.D. NUMBER	~~NYD002100469~~
III. FACILITY NAME	~~HASBROUCK PLASTICS INC~~
V. FACILITY MAILING ADDRESS	~~PO BOX 504~~ ~~HAMBURG, NY 14075~~
VI. FACILITY LOCATION	~~1975 LAKEVIEW RD~~ ~~HAMBURG, NY 14075~~

GENERAL INSTRUCTIONS

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

II. POLLUTANT CHARACTERISTICS

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

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

III. NAME OF FACILITY

1 SKIP HASBROUCK PLASTICS, INC.

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*		
2 ZITTEL ROBERT PURCHASING AGT.	716	627	2371

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

3 PO BOX 504 - 1975 LAKEVIEW RD.

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 HAMBURG	NY	14075

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

5 1975 LAKEVIEW ROAD

B. COUNTY NAME

ERIE COUNTY

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE *(if known)*
6 HAMBURG	NY	14075	

CONTINUED FROM THE FRONT

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

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

VIII. OPERATOR INFORMATION

A. NAME: C 8 MARY ELLEN HASBROUCK

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

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)
F = FEDERAL
S = STATE
P = PRIVATE
M = PUBLIC (other than federal or state)
O = OTHER (specify)

P (56) (specify)

D. PHONE (area code & no.): C A (15) 716 (16-18) 627 (19-21) 2371 (22-25)

E. STREET OR P.O. BOX: P.O. BOX 504

F. CITY OR TOWN: C B HAMBURG

G. STATE: NY

H. ZIP CODE: 14075

IX. INDIAN LAND

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

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water): C T I 9 N	D. PSD (Air Emissions from Proposed Sources): C T I 9 P
B. UIC (Underground Injection of Fluids): C T I 9 U	E. OTHER (specify): C T I 9 (specify)
C. RCRA (Hazardous Wastes): C T I 9 R 8700-12 6-80	E. OTHER (specify): C T I 9 (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements. ~~See Attached Sheet.~~ — F9:N/50

XII. NATURE OF BUSINESS (provide a brief description)

Small manufacturer of fiberglass reinforced plastic equipment for the corrosion-control industry.

F9:A/51

XIII. CERTIFICATION (see instructions)

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

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
Robert C. Zittel - Purchasing Agt.	Robert C. Zittel	November 14, 1980

COMMENTS FOR OFFICIAL USE ONLY: C

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

Form Approved OMB No. 158-S80004

FORM 3 RCRA

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

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

I. EPA I.D. NUMBER

S F NYD002100469 T/A 3 C 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.)*

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

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

C 8 — YR. 62 — MO. 02 — DAY 01

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

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

S C DUP T/A C 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S02	600	G		5				
X-2	T03	20	E		6				
1	S01	55000	G		7				
2	T01	10000	U		8				
3					9				
4					10				

CONTINUE ON REVERSE

Continued from the front.

III. PROCESSES *(continued)*

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

IV. DESCRIPTION OF HAZARDOUS WASTES

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

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

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

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

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

D. PROCESSES

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

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

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

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

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

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

 CONTINUE ON PAGE 3

Continued from page 2.

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

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)	FOR OFFICIAL USE ONLY
S W NYD0021004 69 T/A 3 C 1	S W DUP T/A 3 C 2 DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)				D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	F003	6500000	P	T01	S01			
2								
3								
4								
5								
6								
7								
8								
9								
10								
11								
12								
13								
14								
15								
16								
17								
18								
19								
20								
21								
22								
23								
24								
25								
26								

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTES *(continued)*

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

F6 : A/55 F6 : N/56

EPA I.D. NO. *(enter from page 1)*														
S	N	Y	D	0	0	2	1	0	0	4	6	9	T/A 3	C 6
1	2											13	14	15

V. FACILITY DRAWING

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

VI. PHOTOGRAPHS

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

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE *(degrees, minutes, & seconds)*	LONGITUDE *(degrees, minutes, & seconds)*
~~NA~~ (65–66) (67–68) (69–71)	~~NA~~ (72–74) (75–76) (77–79)

VIII. FACILITY OWNER

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

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

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

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

IX. OWNER CERTIFICATION

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

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
MARY ELLEN HASBROUCK	M. E. Hasbrouck, Pres.	11/17/80

X. OPERATOR CERTIFICATION

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

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
Robert C. Zittel	Robert C. Zittel	November 14, 1980.

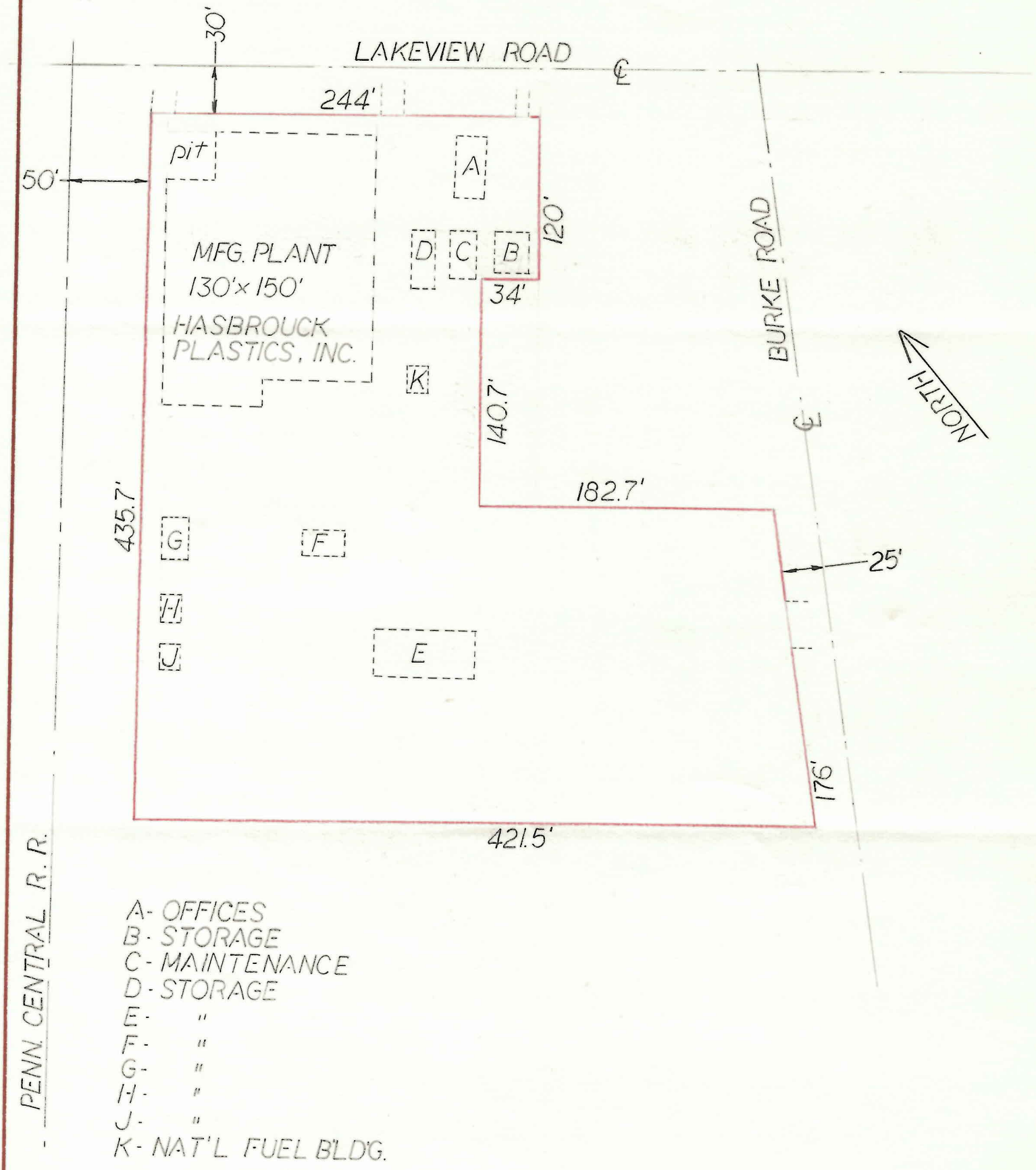
CONTINUE ON PAGE 5

NYD002100469 HASBROUK PLASTICS.

Continued from page 4.

Form Approved OMB No. 158-S80004

V. FACILITY DRAWING *(see page 4)*

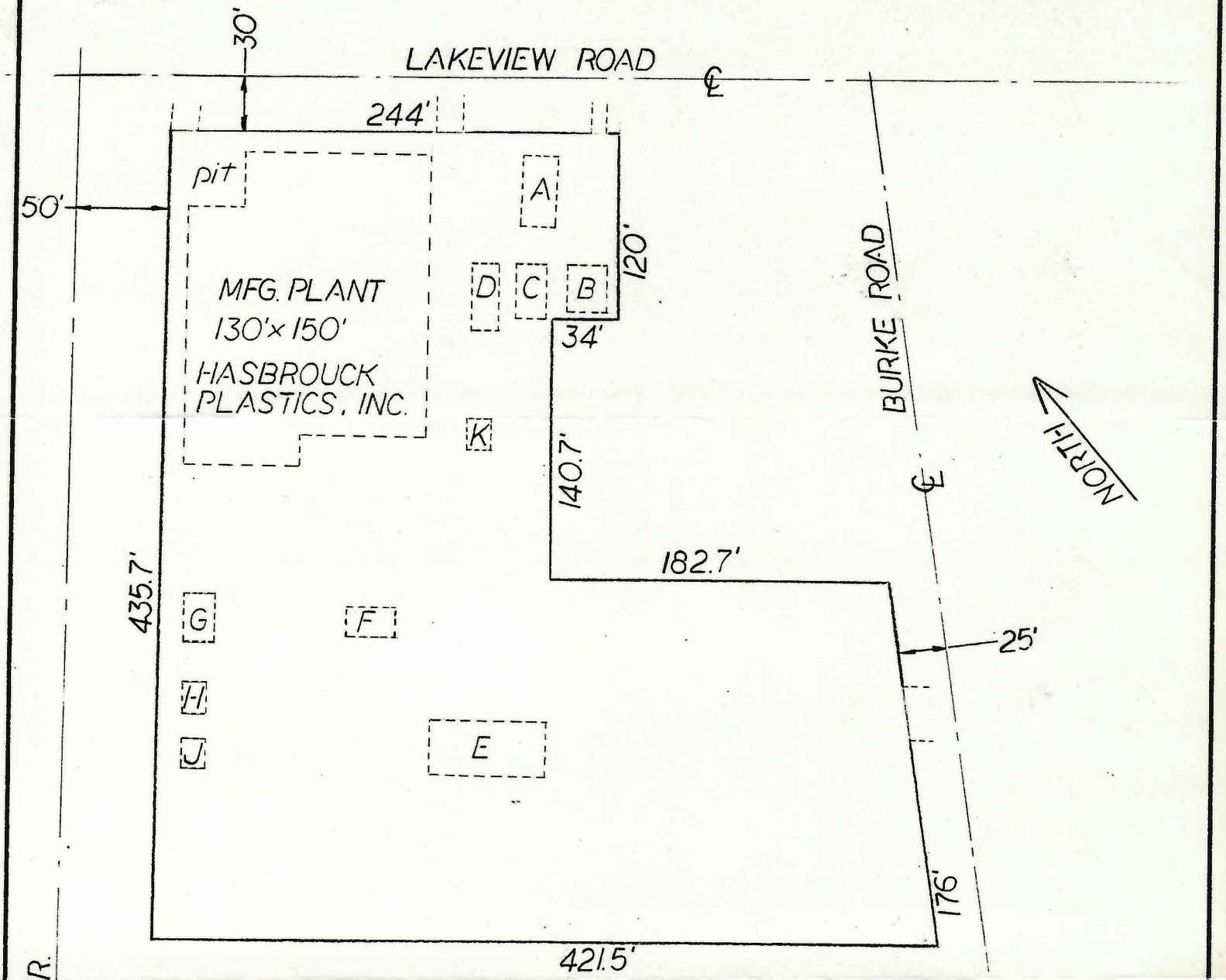


Ref. Twn. of Hamburg Lot 44-T.9, R.8 ℄ 11-14-80

Continued from page 4.

Form Approved OMB No. 158-S80004

V. FACILITY DRAWING *(see page 4)*



A- OFFICES
B- STORAGE
C- MAINTENANCE
D- STORAGE
E- "
F- "
G- "
H- "
J- "
K- NAT'L FUEL B'LD'G.

Ref. Twn. of Hamburg Lot 44-T.9, R.8

℗ 11-14-80

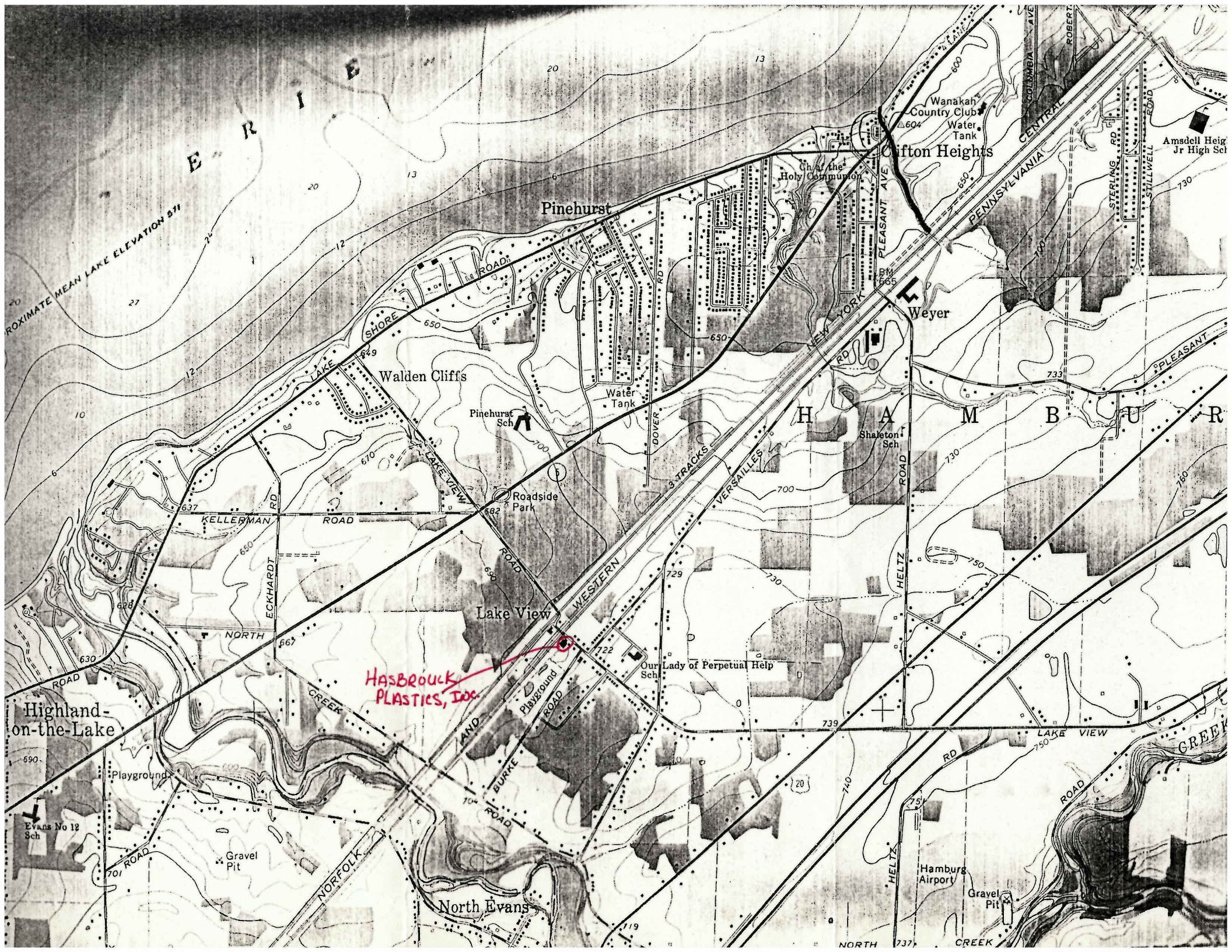
Latitude: 42° 42' 42"

Longitude: 78° 56' 15"

Standard Industrial Classification Code #: 3079

Topographic Map and picture showing where drums are stored is attached.

HASBROUCK
PLASTICS, INC.
P. O. BOX 504
HAMBURG, N. Y. 14075


E R I E
ROXIMATE MEAN LAKE ELEVATION 571
Pinehurst
Walden Cliffs
Pinehurst Sch
Water Tank
Roadside Park
Lake View
Highland-on-the-Lake
Playground
Evans No 12 Sch
Gravel Pit
North Evans
Wanakah Country Club
Water Tank
Clifton Heights
Ch of the Holy Communion
Weyer
Shaleton Sch
H A M B U R
Our Lady of Perpetual Help Sch
Hamburg Airport
Gravel Pit
Amsdell Heig Jr High Sch
HASBROUCK PLASTICS, INC.
LAKE SHORE ROAD
KELLERMAN RD
ROAD
ECKHARDT RD
NORTH ROAD
CREEK
BURKE ROAD
AND
NORFOLK
WESTERN
3 TRACKS
VERSAILLES
DOVER RD
PLEASANT AVE
NEW YORK
PENNSYLVANIA
CENTRAL
HELTZ RD
LAKE VIEW ROAD
PLEASANT
STERLING RD
STILWELL ROAD
COLUMBIA AVE
ROBERT
BM 665

L. Livingston

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

Thomas C. Jorling
Commissioner

file

JAN 20 1988

PF done 1/26/88 ✓
✓ C119=$ ✓ CMT 10:
✓ C1105=5
✓ C1103=$
✓ C305=$

Mrs. Mary Ellen Hasbrouck
President
Hasbrouck Plastics, Inc.
P.O. Box 120
Hamburg, NY 14075

Dear Mrs. Hasbrouck:

Re: Reclassification of Hasbrouck Plastics
EPA I.D. No. NYD002100469

The New York State Department of Environmental Conservation (DEC) is now fully responsible for administration of the Resource Conservation and Recovery Act (RCRA) regulatory program for hazardous waste facilities operating under interim status with Part A RCRA Permits.

In order to qualify as an interim status hazardous waste treatment, storage or disposal (TSD) facility pursuant to Section 3005(e) of RCRA and 6NYCRR Part 373, a facility was required to be in existence on November 19, 1980, and to be conducting a hazardous waste activity requiring a RCRA and/or Part 373 Permit. Based on information submitted by your company, it appears that your facility has never qualified for interim status pursuant to Section 3005(e) of RCRA and/or 6 NYCRR Part 373, insofar as it never conducted a RCRA or 373 permittable activity. Therefore, DEC considers your facility to never have operated with interim status under a Part A Permit.

If you have any information which would otherwise indicate that your facility had or does qualify for interim status under RCRA or Part 373, it must be submitted within 14 calendar days of the date of this letter. If you do not respond to this letter within the time provided, your facility will be removed from the list of active TSD facilities.

Please be advised that withdrawal of your Part A Permit application terminates your privilege to operate with interim status in the future. Should you decide to conduct any activity not exempt from the permit requirements of 6 NYCRR Part 373 and/or 40 CFR Parts 264, 265 and 270, you must first obtain full Part 373 and RCRA Permits. Failure to obtain the proper permits will subject you to enforcement actions pursuant to Section 3008 of RCRA and Article 27, Titles 7 and 9 of the Environmental Conservation Law.

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

Sincerely,

James Sibbald Moran, P.E.
Supervisor
Facility Closure Section
Bureau of Hazardous Waste Operations
Division of Hazardous Substances Regulation

cc: R. Zittel; Hasbrouck Plastics
L. Oppenheimer; Cohen, Swados, Wright, Hanifin, Bradford & Brett
L. Livingston (EPA Region II - Permits Administration Branch)
H. Mulholland (EPA Region II - Hazardous Waste Compliance Branch)
J. Middelkoop (NYSDEC - Bureau of Hazardous Waste Operations)
R. Mitrey (Regional Hazardous Waste Engineer, NYSDEC, Region 9)
R. Henning (Region 9)

HASBROUCK PLASTICS, INC.
1975 LAKEVIEW ROAD ■ LAKE VIEW, NY 14085 ■ (716) 627-2371 ■ FACSIMILE (716) 627-3147

April 19, 1988

U.S. EPA Region II
Permits Administration Branch
26 Federal Plaza
New York, NY 10278

NYD002100469

Ref: Change of ownership

Gentlemen:

This letter is to notify you that, effective January 25, 1988, the ownership of Hasbrouck Plastics, Inc. (EPA ID ~~#NYD0021469~~) changed. Our new owners are:

Mr. Lewis E. Casolini - President - CEO
Mr. Kenneth W. Geiser - Secretary
Mr. Donald P Grenier - Vice President

owner change ✓
done 4/25/88

Our physical location of Hasbrouck Plastics, Inc. remains the same as before - 1975 Lakeview Road, Lakeview, NY 14085, which is located in the Town of Hamburg, NY 14075.

As our physical location of our plant did not change we anticipate that our Federal EPA ID Number will remain the same as it was under the old ownership of Mary Ellen Hasbrouck.

Should you require a new Notification of Hazardous Waste Activity Form to be filled out then please so advise.

We trust this information is sufficient for your files.

Very truly yours,

HASBROUCK PLASTICS, INC.

Robert C. Zittel

Robert C. Zittel
Financial Manager

RCZ/

47-15-16 (12/82)

(1)

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 82

Page No. 1 of 1

(2) ☐ GENERATOR EPA ID NUMBER NYD002100469 OR ☑ SMALL GENERATOR Less than 100 Kilograms generated per month

NAME HASBROUCK PLASTICS, INC.

STREET 1975 LAKEVIEW ROAD

CITY HAMBURG STATE New York ZIP CODE 14075

(3) ☐ TRANSPORTER EPA ID NUMBER NYSDEC Part 364 Permit No.

NAME NA

STREET

CITY STATE ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)

EPA ID NUMBER NYSDEC Facility I.D. No.

NAME NA.

STREET

CITY STATE ZIP CODE

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
NA.						

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME Robert C. Zittel TITLE Purchasing Agent

SIGNATURE Robert C. Zittel DATE March 11, 1983

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
REGULATORY FEE DETERMINATION UNIT
P. O. BOX 12879, ALBANY, NEW YORK 12212

Henry G. Williams
Commissioner

INVOICE NUMBER: 276114320000

INVOICE DATE: 10/03/83

BILL TO: HASBROUCK PLASTICS INC
1975 LAKEVIEW RD
HAMBURG, NY 14075

PAGE: 1

BILLING PERIOD: 04/01/83-03/31/84

>>>> HAZARDOUS WASTE PROGRAM FEE

	FEE AMOUNT
EPA ID NUMBER: NYD002100469	
TREATMENT, STORAGE AND DISPOSAL FACILITY FEE	
A. Base Facility Fee for 1000 tons or less per year	$ 6,000.00
TOTAL HAZARDOUS WASTE PROGRAM FEE:	$ 6,000.00

TOTAL FEE ASSESSED	PAYMENTS/CREDITS TO DATE	BALANCE OWED
$ 6,000.00	$ 0.00	$ 6,000.00

AMOUNT DUE THIS STATEMENT	PAST DUE AMOUNT	PENALTIES	INTEREST	TOTAL AMOUNT DUE
$ 2,000.00	$ 0.00	$ 0.00	$ 0.00	$ 2,000.00

PAY THIS AMOUNT
BY 11/02/83

RETURN ONE COPY of this invoice with your check made payable to "NYS Environmental Conservation" to the following address:

NYS Department of Environmental Conservation
Regulatory Fee Determination Unit
P.O. Box 12879
Albany, New York 12212

You may pay the amount due as shown or you may pay the total balance owed and avoid additional invoices.

If you have any questions reguarding this bill, you may call the Regulatory Fee Determination Unit at the following TOLL FREE NUMBER (1-800-225-2566) between 9:00 a.m. and 4:00 p.m. Monday through Friday.

Forms for disputing the Department's Environmental Regulatory Fee may be obtained in person at any of the Department's Regional Offices, or by telephoning the Department's 24-hour TOLL FREE NUMBER for Dispute Forms (1-800-544-5252). This number is reserved for requesting dispute forms only.

* If you receive more than one bill from DEC, their total amount exceeds $500, and you wish to pay in more than one installment, contact the Department at the toll free number to request a new consolidated bill. If a bill is consolidated, one-third of the total fee assessed will be due on the original payment due date.

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

ENVIRONMENTAL REGULATORY FEE SCHEDULE

WASTE TRANSPORTER PROGRAM FEE

Industrial-Commercial Waste Transporters	Annual Fee
First Vehicle	$250
Each Additional Vehicle	100

Exemptions or Variances

Some persons have a temporary variance or exemption from the requirement of listing license plate numbers of vehicles on their permit. These persons will receive a bill based upon the total number of vehicles for which the variance or exemption applies or $5,000, whichever is less.

Any Other Transporters	
First Vehicle	$125
Each Additional Vehicle	50

Fee Calculation

Waste transporters will generally receive two invoices during 1983-84. The first will cover a billing period which runs from April 1, 1983 through the expiration date of the permit that was in effect on April 1. The second invoice will be for the transporter permit issued or renewed subsequent to April 1, 1983. The second invoice will cover a full year. For the first invoice the fee will be based on the number of days in the billing period. For example an industrial transporter with five vehicles whose permit expires on July 31, 1983 will be invoiced as follows:

Days in the billing period 4/1/83-7/31/83 = 122		
Annual fee for first vehicle	$250	
Annual fee for 4 additional vehicles	400	
	$650	Part year fee (122 / 365) x (650) = $217.26

Permit Modifications

Changes in license plate numbers or other similar changes that do not result in an increase in the number of vehicles will not require an additional fee, but must be reported to the Department.

AIR QUALITY CONTROL PROGRAM FEE SCHEDULE

Process Sources	Annual Fee
Emissions of specific Contaminant less than 25 tons per year	$ 20
Emissions of specific Contaminant equal to or exceeding 25 tons per year	175
Stationary Combustion Installations	
Heat input less than 50 million BTU's per hour	$ 20
Heat input equal to or exceeding 50 million BTU's per hour	175
Incinerators	
Charging Rate less than 2000 pounds per hour	$ 20
Charging Rate equal to or exceeding 2000 pounds per hour	175

Fee Determination for each Facility

The annual program fee for an existing emission point is determined from information contained on the certificate to operate.

HAZ..DOUS WASTE PROGRAM FEE SCHEDULE

I. For All Generators of Hazardous Waste (Total quantity of hazardous waste generated)	Annual Fee
From 15 tons to 100 tons per year	$ 500.00
From greater than 100 tons to 500 tons per year	$ 3,000.00
From greater than 500 tons to 1,000 tons per year	$ 10,000.00
Greater than 1,000 tons per year	$ 20,000.00

II. Treatment, Storage And Disposal Facilities
(For facilities subject to Part 360,

A. Base Facility Fee
(Total quantity of hazardous waste treated, stored or disposed in facilities subject to permitting)

0 to 1,000 tons per year	$ 6,000.00
greater than 1,000 tons per year	$ 15,000.00

B. Additional Facility Fees

1. Landfills (per facility)
   - Not Generator Owned $100,000.00
   - Generator Owned $ 50,000.00
2. Incinerators (per unit) $ 5,000.00
3. Energy Recovery Units (per unit) $ 5,000.00
4. Surface Impoundments used for treatment or disposal (per facility) $12,000.00

Fee Determination

New Reporting Requirement

Part 482 of the Environmental Regulatory Fee Regulations requires every hazardous waste generator and treatment, storage or disposal facility operator to submit a certification to the Department on or before April 30 of each year beginning April 30, 1984. The certification must state the actual amount of hazardous waste generated and/or handled in the State fiscal year (April 1 through March 31) just concluded. The Department will provide forms for certification in a separate mailing.

Redetermination of hazardous waste program fees

The 1983-84 fee is based on reports filed for the preceding calendar year. In determining the annual fee for generators, the Department relied on the Annual Reports required from generators by 6 NYCRR Part 365, The Regulation For Generators, Transporters And Facilities Dealing With Hazardous Waste. In determining the annual fee for existing treatment, storage or disposal facilities, the Department relied on the Annual Reports required from facilities by 6 NYCRR Part 360, Solid Waste Management Facilities. After April 30, 1984, when the certification of actual waste volumes for the current state fiscal year is received, it may be necessary for the Department to redetermine the fee based on the actual amounts. Any underpayment or overpayment of the 1983-84 fee will be reflected in invoices for the 1984-85 fee.

HASBROUCK
PLASTICS, INC.
P.O. BOX 504
HAMBURG, N.Y. 14075

(716) 627-2371

July 15, 1981

Information Service Center
EPA Region II
26 Federal Plaza
New York, New York 10278

Ref: EPA I.D. Number NYD002100469

Attn: Mrs. Cooper

Dear Mrs. Cooper:

As per our telecon on Friday, July 10, 1981 please find attached the following information you requested to continue processing our Application for a Hazardous Waste Permit (EPA Form 3510-1 (6-80)).

Should you have any questions or need further assistance please call me @ (716) 627-2371. Thank you.

Very truly yours,

HASBROUCK PLASTICS, INC.

Robert C. Zittel

Robert C. Zittel
Purchasing Agent

/rcz
Enclosure

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

Henry G. Williams
Commissioner

TO: Recipients of Environmental Regulatory Fee Invoices

As part of this year's State Budget, the Legislature enacted a new law, effective April 1, that establishes new fees to help offset costs of the State's Environmental Regulatory Programs. The fees are applicable to all persons who require a permit or approval pursuant to the State's air and water pollution control programs, waste transporter program and the hazardous waste control programs. The fee schedule embodied in the new law is enclosed.

The enclosed invoice requires payment of fees due on facilities which you own that are subject to the Environmental Regulatory Fee. The invoice is based on the Department's records of regulated activities in which you were engaged when the law became effective April 1. In the case of waste transporters, invoices are based on the effective date of permits. The law provides that even if the activities you were engaged in on April 1 have been discontinued, you are subject to the full annual amount of the fee. Fees for new activities that commenced subsequent to April 1 will be covered by a separate invoice and payment procedure.

The new Environmental Regulatory Fee is separate from the Uniform Procedures Act fee which is assessed at the time of application for permits and certificates to cover the cost of application processing.

The invoice contains instructions for making your payments and for resolution of any questions you may have on the bill. Should you desire a copy of the Environmental Regulatory Fee Legislation or the rules and regulations promulgated by the Department, use the form at the bottom of this letter to make your request.

The law provides substantial penalties and interest for fees that are not paid on time. Avoid penalties and interest by making payments by the due date specified on the invoice.

Sincerely,

Richard R. Lynch
Director of Fiscal Management
Department of Environmental Conservation

LEGISLATION AND REGULATIONS
Request Form

To receive a copy of the Legislation and/or regulations promulgated by the Department, check the box indicating the copy or copies in which you are interested. Send the form, along with a self-addressed, stamped envelope (size 10 x 13) with the postage indicated below affixed to:

Regulatory Fee Determination Unit
NYS Department of Environmental Conservation
50 Wolf Road, Room 109
Albany, New York 12233-0001

Legislation	☐	- - - $ 0.37
Regulations	☐	- - - $ 0.71
Regulations & Legislation	☐	- - - $ 0.88

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: OCT 28 1983

SUBJECT: Determination of Regulatory Status Under RCRA for Site in New York State

FROM: Ernest A. Regna, Chief
Solid Waste Branch (2AWM-SW)

TO: Richard A. Baker, Chief
Permits Administration Branch (2PM-PA)

file

Company Name	Site Location	RCRA I.D. No.
Hasbrouck Plastics, Inc.	Hamburg, NY	NYD002100469

Check into database — kw
C119 = $
C1105 = WD (6) &
C1103 = X

Information regarding the above referenced site has been evaluated by the Solid Waste Branch relative to a change in the site's regulatory status.

1._____Please notify the company of the following status change and the reason for such change:

Please make the appropriate change in our computer data base.

2._____Please notify the company that its regulatory status under RCRA will remain unchanged for the following reason(s):

3.__X__Please develop a notification to the company which indicates that its site could qualify for a status change and that a request with adequate documentation should be submitted to EPA.

no 8 1/28/87.

4._____Please develop a notification to the company which indicates that its request for status change was inadequate and that they must submit additional information. A suggested letter format is attached.

If you have any questions in this matter, please contact Frank Langone of my staff at 264-2073.

F. Langiewicz
x2073

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James Pfeffer
Plant Superintendent
Hasbrouck Plastics, Inc.
1975 Lakeview Road 14075
Hamburg, N.Y.

Re: Change of Status/Declassification under the Resource Conservation and Recovery Act (RCRA)
EPA Identification Number: NYD 002 100 469
Site Location: Same.

Dear Mr. Pfeffer:

By previous notification, you informed the Environmental Protection Agency (EPA) that you conduct activities at the above referenced site involving hazardous wastes, and as such were subject to the requirements of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976 (RCRA), as amended, 42 U.S.C. §6901, et seq. (the Act).

~~either~~

~~Your recent letter, dated _____, in which you request declassification or change of status in the RCRA program, has been reviewed and found to be inadequate in supplying EPA with sufficient information to change the status of your site. Specifically, the deficiencies are:~~

~~or~~

Information which EPA has on file indicates that the above referenced site may qualify for declassification or change in status under the RCRA program. If such is the case, a duly authorized representative for the site should submit a formal request for declassification or status change.

~~(continue)~~

The request must contain specific information concerning your past and future activities in hazardous waste management, including the identity and amount of the hazardous wastes involved, your

activities in managing these wastes, how and when conditions at your site, as they relate to RCRA, have or will change, and what is the basis for the request. Furthermore, the request must be signed by the appropriate, responsible official, duly authorized, as follows:

For a corporation - by a principal executive officer of at least the level of vice president; for a partnership or sole proprietorship - by a general partner or the proprietor, respectively; for a municipality, State, Federal or other public agency - by either a principal executive officer or ranking elected official; or in any case by a duly authorized representative of the aforementioned persons, as specified in the Code of Federal Regulations, 40 CFR §270.11. In addition, a certification should be made, attesting to the truth and accuracy of the information, as specified in 40 CFR §270.11.

Please be aware that the determination of your status will be made solely on the basis of applicable federal regulations. The State of New York also regulates the handling of hazardous waste. Therefore, the New York State Department of Environmental Conservation should be consulted, regarding State compliance responsibilities.

Please be advised that Section 3008 of the Act authorizes the assessment of criminal penalty, including fine and/or imprisonment, for any person who knowingly makes any false statment or representation in any application, record, report, or other document filed, maintained, or used for purpose of compliance with these requirements.

Please respond within 30 days of your receipt of this letter. Please address your response to:

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

with copies to:

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

and Robert Mitrey, ~~NYSDE~~ Engineer - Regional Solid Waste NYSDEC, Reg. 9 600 Delaware Ave. Buffalo, NY 14202

Appropriate NYSDEC
Regional Solid Waste Engineer

You must include your EPA identification number on all correspondence.

Should you wish to discuss this matter further, please contact ~~Staff Engineer~~ Frank A. Langone at (212) 264- 2073.

Sincerely yours,

Richard A. Baker
Chief
Permits Administration Branch

cc: David Mafrici
Chief, Bureau of Hazardous Waste Operations
NYSDEC

NYSDEC Regional Solid Waste Engineer

bcc: ~~Staff Engineer~~, SWB
FRANK A. Langone

HANDUK/TESTA/LANGONE/BAKER

New York State Dept. of Environmental Conservation
600 Delaware Ave.
Buffalo, NY 14202

NYD002100469

HASBROUCK
PLASTICS, INC.
P.O. BOX 504
HAMBURG, N.Y. 14075

(716) 627-2371

change made 8/8/15

August 20, 1980

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

Attn: Mr. Harry Ruisi

Ref: HPI ID# NYD002100469
Notification of
Hazardous Waste Activity

Dear Mr. Ruisi:

In preparing our Notification of Hazardous Waste Activity form to meet the August 18, 1980 deadline - some information was overlooked.

Please refer to Section VI - Type of Hazardous Waste Activity. I checked Box A, as Hasbrouck Plastics is a Generator. I failed to check Box B-Transportation and Box C-Treat/Store/Dispose. Although I did not check Box C, I did send in the postcard requesting a RCRA Permit Application which I have received.

Would you please check both Box B and C under Section VI. I apologize for any inconvience I may have caused due to my oversight. Thank you.

Very truly yours,

HASBROUCK PLASTICS, INC.

Robert C. Zittel

Robert C. Zittel
Purchasing Agent

47-15-15(7/82)

(2)

9

RCRA INSPECTION FORM

Report Prepared for:

Generator ☒

Transporter ☒

HWM (TSD) facility ☒

Copy of report sent to the facility ☐

Facility Information

Name: HASBROUCK PLASTICS, INC.

Address: 1975 LAKEVIEW RD., HAMBURG

EPA ID#: NYD 002 100 469

Date of Inspection: MAY 3, 1983

Participating Personnel

State or EPA Personnel: A.D. McKENZIE

Facility Personnel: JAMES PFEFFER, PLANT SUPT.
ROBERT ZITTEL, PURCH. MGR.

Report Prepared by Name: A.D. McKENZIE

Agency: N.Y.S.D.E.C.

Telephone #: (716) 847-4585

Approved for the Director by:

HASBROUCK
PLASTICS, INC.
P.O. BOX — 120
HAMBURG, N.Y. 14075

(716) 627-2371

February 10, 1983

Mr. Joseph Cvinar
Grants Administration Branch
Office of Policy and Management
U.S. Environmental Protection Agency
26 Federal Plaza
New York, NY 10278

NYD002100469

Dear Mr. Cvinar:

This is in regards to Mr. Conrad Simon's letter dated January 31, 1983 stating Hasbrouck Plastics is in violation of 40CFR-265.143. and 40CFR-265.147..

I believe there has been a mistake made regarding the classification which under Hasbrouck Plastics should be put.

We are not an operator of a hazaradous waste facility, but that of a small generator, manufacturing Fiberglass Reinforced Plastic equipment for the corrosion-control industry employing 21 Production workers.

At the time I filed a Generator's Report in August of 1980, we did have in our storage area 15 - 55 gallon drums of Acetone Wash, a by-product generated from our manufacturing process. This had been collected and stored at our site over a two/three year period. When enough of it was accumulated, it was then taken to Newco Chemical Waste Systems for proper disposal.

With manufacturing and disposal costs increasing each year, an acetone recovery machine was purchased at the end of August, 1980 to reclaim and recycle this acetone wash for reuse in our plant. The machine performed so well that another recovery machine was purchased in November of the same year.

Eighty percent of the acetone recycled from the machines is reused in our plant, leaving a twenty percent acetone sludge residue, which comes out of the machines in a liquid and hardens into a solid state. Because it would take more than 90 days to reclaim and recycle these drums of acetone wash, in addition to what we were using in the plant, a Part A permit application was filed for on November 17, 1980 for storage of these drums at our plant. At present we have accumulated a few drums of this hardened residue since 1980 for future off-site disposal.

How long before recycling?

Waste generated firm as hazardous waste in storage until proven otherwise

With regards to our insurance, we feel we have a sufficient amount. Our liability insurance covers up to One Million dollars for damages incurred by the two small machines.

I have attempted to show that Hasbrouck Plastics is not in violation as we have tried to follow every possible step for State and Federal complience. Should you or your staff have any questions, please contact me at (716) 627-2371. Thank you for your attention to this matter.

Very truly yours,

HASBROUCK PLASTICS, INC.

Robert C. Zittel

Robert C. Zittel
Purchasing Agent

RCZ/

HASBROUCK
PLASTICS, INC.
P. O. BOX ~~504~~ 120
HAMBURG, N. Y. 14075

John Joseph 0546

RECORD OF COMMUNICATION

☒ PHONE CALL ☐ DISCUSSION ☐ FIELD TRIP ☐ CONFERENCE
☐ OTHER (SPECIFY)

(Record of item checked above)

TO: File

FROM: T Tracchio

DATE: 6/7/83

TIME:

SUBJECT: TSD Withdrawal Request (attached letter 2/10/83), NYD002100469

SUMMARY OF COMMUNICATION

Per attached letter of 2/10/83, talked to J Cleary, SWB, on 6/7/83. Company's letter requests that EPA ~~withd~~ withdraw their TSD status. Review of this letter, however, leaves several questions unanswered. (Residue generated from Company's acetone recovery process is hazardous until proven otherwise. Company is storing several drums of residue on site.). J. Cleary will call the NYSDEC and have Hasbrouck Plastics inspected.

CONCLUSIONS, ACTION TAKEN OR REQUIRED

Wait for DEC's inspection finding Code to HWDMS as a State referral

INFORMATION COPIES
TO:

EPA Form 1300-6 (7-72) REPLACES EPA HQ FORM 5300-3 WHICH MAY BE USED UNTIL SUPPLY IS EXHAUSTED.

NYD002100469

HASBROUCK
PLASTICS, INC.
P.O. BOX 504
HAMBURG, N.Y. 14075

(716) 627-2371

July 29, 1980

sent postcard to EPA 7/31/80 aj.

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

Attn: Mr. Harry Ruisi

Dear Mr. Ruisi:

As a generator Hasbrouck Plastics, Inc. may expect to store Hazardous waste at our plant for future disposal. It is my understanding that a permit is required to cover the storage activity of Hazardous waste until disposal arrangements can be made.

Upon completion of the EPA form for Notification of Hazardous Waste Activity, I noticed that the permit application to cover this temporary storage was not enclosed or attached.

Your cooperation in sending this application form to my attention is greatly needed so Hasbrouck Plastics, Inc. can meet the August 18, 1980 filing deadline. Thank you.

Very truly yours,

HASBROUCK PLASTICS, INC.

Robert C. Zittel

Robert C. Zittel
Purchasing Agent

Summary of Findings

Facility Description and Operations

Hasbrouck Plastics is a fabricator of custom built pipe, ductwork, tanks, & containers of all shapes & sizes. These items are made from three kinds of resin (polyester, vinyl ester & furan) reinforced with fiber glass.

A form is used to determine the shape of the object & it is built up with layers of fiber glass saturated with the resin. Just prior to use the resins are mixed with styrene which initiates a chemical reaction that ends with a rigid product.

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

Acetone is used to clean brushes, rollers, gloves & hands. It gradually becomes contaminated with the resins used to bind the fibre-glass

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

2 full plus 2 ea half full 55 gal drums of mixed resins with some acetone (F003). Not more than 4 drums are generated per year of this waste (approx 130#/mo.). Greater care in minimizing waste has caused this reduction when compared to the original 15 drums per year waste (approx 540#/mo.)

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.
- [ ] Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application.
- [x] The waste material is listed in the regulations as a hazardous waste from a nonspecific source (§261.31)
- [ ] The waste material is listed in the regulations as a hazardous waste from a specific source (§261.32)
- [ ] The material or product is listed in the regulations as a discarded commercial chemical product (§261.33)
- [ ] 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)

applied for but never used & never will be

Transporter Inspection Report Form

40 CFR Part 263 Transporter Standards	YES	NO	N/A
263.10 - Does the transporter carry hazardous waste?	___	✓	___
263.12 - Does the transporter store hazardous waste at a transfer facility - if yes, how long? _____10 days or less _____more than 10 days (complete TSD form)	___	___	___
263.20 - Manifest System			
1) Does the transporter have a copy for each manifest shipment of hazardous waste?	___	___	___
2) Does a representative portion of the manifests show the following information (if no, circle the missing information)	___	___	___
o Generator's name, address, telephone and EPA I.D. numbers, signature and date of signature	___	___	___
o Transporter's name, EPA I.D. number, signature and date of signature	___	___	___
o TSDF's name, address and EPA I.D. Number	___	___	___
and either the signature and date of the TSDF or the name, EPA I.D., signature and date of the next transporter.	___	___	___
o Manifest Document number	___	___	___
o Proper DOT shipping description	___	___	___
o Quantity & type of containers	___	___	___
(If no, to any of the above obtain copies of incomplete manifests).			
3) Based on available information, do all manifests conform to the hazardous waste shipments made? If no, explain	___	___	___
262.22 - Have records been kept since November 19, 1980?	___	___	___
263.30 - Has there ever been a spill or discharge of hazardous waste during transportation?	___	___	___
If yes, was the incident report submitted to DOT? (obtain copy of the report)	___	___	___
263.31 - If there was any spill or discharge of hazardous waste, was it cleaned up? If no, explain.	___	___	___

General Comments:

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

	YES	NO	N/A
40 CFR Part 265 Subpart B General Facility Standards			
265.13-General Waste Analysis			
1) Is there a detailed chemical and physical anaylsis of a representative sample of the waste or each waste? (At a minimum this analysis must contain all the information necessary for proper management of the waste)		✓	
2) Does the character of the waste handled at the facility change from day to day, week to week, etc., thus requiring frequent testing? You may check only one			
Waste characteristics vary			
All waste are basically the same	✓		
Company treats all waste as hazardous			
3) Is there a written waste analysis plan at the facility?		✓	
Does it contain the following:			
a) Parameters for each waste to be analyzed and the rationale for the selection of these parameters.			
b) Test methods used to test these parameters.			
c) Sampling methods to obtain a representative sample of the waste to be analyzed.			
d) Frequency of repeated analysis to ensure accurate and current information.			
4) Does hazardous waste come to this facility from an outside source? e.g. another generator.		✓	
5) If waste comes from an outside source, are there procedures in the plan to insure that waste received conforms to the accompanying manifest?			✓
265.14-Security			
1) Is there: a) a 24-hour surveillance system? or,			
b) a suitable barrier which completely surrounds the active portion of this facility?	✓		
2) Are there "Danger-Unauthorized Personnel Keep Out" signs posted at each entrance to the facility?		✓	
If no, explain what measures are taken for security.			
265.15 - General Inspections Requirements			
1) Does the facility have a written inspection schedule?	✓		
2) Does the schedule identify the types of problems to be looked for and the frequency of inspections?	✓		
3) Does the owner/operator record inspections in a log?	✓		
4) Is there evidence that problems reported in the inspection log have been remedied?	✓		
If no, please explain.			

(signs say "unauthorized personnel keep out - report to office")

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

1 hr. verbal instruct each 4 to 5 mo

265.17-General Requirements for Ignitable, Reactive or Incompatible Wastes

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

2 full + 2 half full 55 gal. drums of waste resin from a distillation unit (acetone removed)

the sludge removed from the distillation unit fills & is probably not flammable at that point.

40 CFR 265 - Subpart C - Preparedness and Prevention

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

(however, 3 phones are in the adjoining plant offices)

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

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

(verbal arrangement with local fire dept. - also has emergency ambulance service)

(none designated)

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

265.71 - Use of the Manifest

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

	YES	NO	N/A
3) How many post-November 19 manifests does the facility have? (Estimate if the number is large)			
4) Does each manifest have the following information? (circle missing information)			
— a manifest document number?	—	—	✓
— the generators name, mailing address, telephone number and EPA I.D. #?	—	—	✓
— the transporters name and EPA I.D. Number?	—	—	✓
— the TSD name, address, telephone number & EPA I.D. Number?	—	—	✓
— a description of the waste (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, packaged, marked and labeled, and are in proper condition for transportation under regulations of the DOT and EPA?	—	—	✓
(Obtain a copy of the incomplete manifests)			

265.72 - Manifest Discrepancies

Have there been significant discrepancies between the quantity and type of waste received and the waste identified on the manifest?	—	—	✓
Describe unreconciled descrepancies.			

265.73 - Operating Record

1) Does the facility keep an operating record?	—	✓	✓
2) Does the record contain the following information:			
a) Description and quantity of waste on-site and the method(s) and date(s) of its Treatments, Storage & Disposal?	—	—	—
b) The location and quantity of each hazardous waste at each location?	—	—	—
c) Records and results of waste analysis and trial tests performed and identified in the waste analysis plan?	—	—	—
d) Summary reports and details of all incidents that require implementing the contingency plan.			
e) Records and results of inspections for the past 3 years or November 19, 1980 which ever is less?	—	—	—
f) Monitoring, testing or analytical data where required for:			
Groundwater, Land Treatment, Incinerators, and Thermal Treatment?	—	—	—

265.76 - Unmanifested Waste Report

Has the facility accepted hazardous waste from off-site sources without a manifest?	—	—	✓
If yes, has the facility submitted an unmanifested waste report?	—	—	—

40 CFR 265 Subpart F - Groundwater Monitoring

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

40 CFR 265 Subpart G - Closure and Post-Closure

265.111 Closure Performance Standard

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

only 3 out of 40 people are working now - whole plant is partially shut down

265.112 - Closure Plan

Does the facility have a written closure plan? (Applies to all types of TSD facilities)		✓	
If yes, does the written plan include:			
1. A description of how and when the facility will be partially (if applicable) and ultimately closed?			
2. An estimate of the maximum inventory of wastes in storage or treatment at any time during the life of the facility?			
3. A description of the steps necessary to decontaminate facility equipment during closure?			
4. A schedule for final closure including the anticipated date when waste will no longer be received and when final closure will be completed?			
5. Does the owner/operator have a written estimate of of the cost of closing the facility?			
If yes, what is it? ($) 500 (verbal)			

265.118 - Post Closure Plan

Does the facility have a written post-closure plan? (Applies only to disposal facilities)		✓	
If yes, Does the Plan:			
1. Identify the activities which will be carried on after closure and the frequency of these activities?			
2. Include a description of planned groundwater monitoring activities and their frequency during post-closure?			
3. Include a description of planned maintenance activities and frequency to insure integrity of final cover during post-closure?			
4. Include the name, address and phone number of a person or office to contact during post-closure?			
5. Does the owner/operator have a written estimate of the cost of post-closure for the facility?			
If yes, what is it? ($) 0 verbal			

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

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

	YES	NO	N/A
40 CFR 265 - Subpart I - Containers			
1) - What type of containers are used for storage. Describe the size, type, quantity and nature of waste (e.g. 12 fifty-five gallon drums of waste acetone) 4 – 55 gal. drums			
2) - Is there a containment system for spills, leaks and precipitation? (waste is solid)		✓	
If yes, describe.			
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.			
265.172 - Are hazardous waste stored in containers made of compatible materials?	✓		
If not, please explain.			
265.173(a) - Are all containers closed except those in use?		✓	(1)
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 - Is the storage area inspected at least weekly?	✓		
265.176 - Are containers holding ignitable and reactive waste located at least 50 feet (15 meters) away from the facility's property line?		✓	(2)
265.177 - Are incompatible wastes stored separate from each other?			✓
If no, explain			

(1) Barrel covers were ajar - in the future they will be kept closed

(2) storage shed for waste is against property line - rail road right of way is on the far side

no

40 CFR 265 Subpart J - Tanks	YES	NO	N/A
265.190 1) What are the approximate number and size of tanks containing hazardous waste?	___	___	___
2) Identify the waste treated/stored in each tank.			
265.192 - General Operating Requirements			
1) Are the tanks maintained so that there is no evidence of past, present, or risk of future leaks?	___	___	___
If no, please explain.			
2) Are there leaking tanks?	___	___	___
3) Are all hazardous wastes or treatment reagents being placed in tanks compatible with the tank material so that there is no danger of ruptures, corrosion, leaks or other failures?	___	___	___
4) Do uncovered tanks have at least 2 feet of freeboard or an adequate containment structure?	___	___	___
5) If waste is continuously fed into a tank, is the tank equipped with a means to stop the inflow from the tank? e.g. bypass system to a standby tank	___	___	___
265.194 - Inspections			
1) Is the tank(s) inspected each operating day for			
a) discharge control equipment	___	___	___
b) monitoring equipment	___	___	___
c) level of waste in tank	___	___	___
2) Are the tanks and surrounding areas (e.g., dike) inspected weekly for leaks, corrosion or other failures?	___	___	___
3) Are there underground tanks?	___	___	___
If yes, how many and can they be entered for inspection?	___	___	___
265.198 - Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction?	___	___	___
If no, please explain.			
265.199 - Does it appear that incompatible wastes are being stored separate from each other?	___	___	___

no

40 CFR 265 Subpart K - Surface Impoundments	YES	NO	N/A
Describe the design and operating features of the surface impoundment to prevent ground water contaimination (e.g., liner leachate collection system).			
265.220 - Give the approximate size of surface impoundments (gallons or cubic feet). Please specify the types of wastes stored and treated.			
265.222 - Is there at least 2 feet of freeboard in the impoundment?	___	___	___
265.223 - Do all earthen dikes have a protective cover to preserve their structural integrity?	___	___	___
If yes, please specify the type of covering.			
265.226 - 1) Is the free board level inspected daily?	___	___	___
2) Are the dikes surrounding the surface impoundment inspected for leaks, deterioration or failures inspected weekly?	___	___	___
265.229 - 1) Are any ignitable or reactive wastes placed in the impoundment?	___	___	___
2) If yes, is the waste treated immediately after placement in the impoundment to render the waste non-active and/or non-ignitable?	___	___	___
3) If no, to (2) explain.			
265.230 - Are incompatible wastes placed in the impoundment?	___	___	___
If yes, explain.			

no

40 CFR 265 Subpart L - Waste Piles	YES	NO	N/A
265.250 - How many waste piles are on-site and approximately how large are they? (Please indicate size and height and types of wastes in piles.)			
265.251 - Is the waste pile protected from wind erosion?	___	___	___
a) Does it appear to need such protection?	___	___	___
b) Explain what type of protection does exist.			
265.253 Containment.			
1) Is leachate run-off from the waste piles a hazardous waste? If no, skip down to 265.256.	___	___	___
2) Is the pile placed on an impermeable base?	___	___	___
3) Is run-on diverted away from the pile?	___	___	___
4) Is the leachate and run-off collected and treated?	___	___	___
If no to any of the above questions above then:			
5) Is the pile protected from precipitation and run-on?	___	___	___
6) Are wastes containing free liquids placed in the pile?	___	___	___
265.256 - 1) Are ignitable or reactive wastes placed on the pile? If no, skip to §265.257	___	___	___
2) Is the ignitable or reactive waste added to existing pile resulting in it no longer meeting the definition of ignitable and reactive? If no, explain.	___	___	___
3) Is the waste protected from any materials or condition that may cause it to ignite or react? If no, explain.	___	___	___
265.257 - Does it appear that a pile of incompatible wastes is being stored separate from other wastes or materials, or protected from them by means of a dike, berm, wall or other device? If no, explain.	___	___	___

no

40 CFR 265 Subpart M - Land Treatment

265.270 - Identify the types of waste and the size of the land treatment area?

265.272 - General Operating Requirements

	YES	NO	N/A
1) Can the facility operator demonstrate that the hazardous waste has been made less or non-hazardous by biological degradation or chemical reactions occurring in or on the soil?	___	___	___
Please explain how.			
2) Is run-on diverted from the active portions of the land treatment facility?	___	___	___
3) Is run-off from the active portions of the facility collected?	___	___	___
If yes, is the run-off a hazardous waste?	___	___	___

265.276 - Food Chain Crops

1) Are food chain crops being grown on the facility property?	___	___	___
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 the untreated soils.	___	___	___
2) Has notification of the growing of food chain crops been made to the Regional Administrator?	___	___	___
265.278 - Is there a written and implemented plan for unsaturated zone monitoring?	___	___	___
Make copy for office review.			
265.279 - Are there records of the application dates, application rates, quantities and location of each hazardous waste placed at the facility?	___	___	___
265.281 - Is ignitable or reactive waste immediately incorporated into the soil so that the resulting waste no longer meets that definition?	___	___	___
If not, please explain.			
265.282 - Are incompatible waste placed in separate land treatment areas?	___	___	___
If no, please explain.			

no

40 CFR 265 Subpart N - Landfills

YES NO N/A

265.300 - Identify the types of waste and size of the landfill.

265.302 - General Operating Requirements

1) Is run-on diverted away from the active portions of the landfill? ___ ___ ___

2) Is run-off from active portions of the landfill collected? ___ ___ ___

3) Is waste which is subject to wind dispersal controlled? ___ ___ ___

Please explain how.

265.309 - Does the owner/operator maintain a map with:

1) The exact location and dimensions of each cell? ___ ___ ___

2) The contents of each cell and approximate location of each hazardous waste type? ___ ___ ___

265.312 - Is ignitable or reactive waste treated so that it is not ignitable or reactive before being place in the landfill? ___ ___ ___

Explain how you know.

265.313 - Are precautions taken to ensure that incompatible waste are not placed in the same landfill cell? ___ ___ ___

If no, please explain.

265.314 Special Requirements for Liquid Waste

1) 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? or ___ ___ ___

b) Is the waste treated and stabilized so that free liquids are no longer present? ___ ___ ___

2) Are containers holding liquid waste or waste containing free liquids placed in the landfill? ___ ___ ___

Please describe the types and contents of such containers placed in the landfill.

265.315 - Are empty containers placed in the landfill crushed flat, shredded or similarly reduced in volume before they are buried ? ___ ___ ___

265.316 - Are small containers of hazardous waste in overpacked drums placed in the landfill? ___ ___ ___

If yes, please describe precautions taken to prevent the release of the waste.

no

40 CFR 265 Subpart O & P - Incinerator and Thermal Treatment

	YES	NO	N/A
1) What type of incinerator or thermal treatment is at the site (e.g waterwall incinerator, boiler, fluidized bed, etc.)			
2) List the types and quantities of HW incinerated or thermally treated.			
3) Is the residue from the incinerator thermal treatment unit a hazardous waste?	___	___	___
4) What types of air pollution control devices (if any) are installed in the incinerator/or thermal treatment unit?			
5) Is energy recovered from the process? If yes, describe.	___	___	___
6) What is the destruction and removal efficiency for the organic hazardous waste constituents?			
265.341 and 265.375 - Does the operating record include additional analysis' to determine types of pollutants which might be emitted including:			
- heating value of the waste?	___	___	___
- halogen and sulfur content?	___	___	___
- concentrations of lead and mercury?	___	___	___
If no to any of the above questions is there justification and documentation?	___	___	___
265.345 and 265.373 If operating, does it appear the incinerator/or thermal treatment unit is operating at steady state for conditions of operation, including temperature and air flow?	___	___	___
265.347 and 265.377 - Monitoring and Inspection			
1) Are existing instruments relating to combustion and emission controls monitored every 15 minutes?	___	___	___
If no, explain			
2) Does the incinerator/thermal treatment have all the following instruments for measuring: wastefeed, auxiliary fuel feed air flow, incinerator temperature scrubber flow, and scrubber pH? (Circle missing instruments)	___	___	___
If no, explain.			
3) Is the stack plume observed visually at least hourly for opacity and color?	___	___	___
4) Are there any signs of leaks, spill and fugitive emissions associated with the pumps, valves, conveyors, pipes etc? If yes, describe.	___	___	___
5) Are all emergency shutdown controls and system alarms checked to assure proper operation?	___	___	___
6) Is there any reason to believe the incinerator is being operated improperly? i.e., steady state conditions are not maintained. If yes, explain.	___	___	___
7) Is the incinerator/thermal treatment inspected daily?			

	YES	NO	N/A
265.382 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?			

40 CFR 265 Subpart Q - Chemical, Physical and Biological Treatment
(other than in tanks, surface impoundments or lant treatment facilities)

1) Describe the treatment system at this facility and the the types of wastes treated.

2 small distillation units are used - "EPAR unit #1" made by Equipment Technologies. 5 gal waste in = 4 gal acetone out in 8 hours.

	YES	NO	N/A
265.401 - Does the treatment process system show any signs of ruptures, leaks or corrosion?		✓	
If yes, describe.			
265.401 - Is there a means to stop the inflow of continuously-fed hazardous wastes?	✓		
265.403 - Inspections			
1) Is the discharge control safety equipment (e.g. waste feed cut-off systems, by-pass systems, drainage systems and pressure relief systems) in good working order?	✓		
Are they inspected at least once each operation day?	✓		
2) Does the data gathered from the monitoring equipment (e.g., pressure and temperature gauges) show treatment process is operating according to design?	✓		
Is data gathered at least once each operating day?	✓		
3) Are construction materials of the treatment process inspected at least weekly to detect corrosion or leaking of fixtures and seams?	✓		
4) Are the discharge confinement structures, (e.g. dikes) immediately surrounding the treatment unit inspected at least weekly to detect erosion or obvious signs of leakage (e.g. wet spots or dead vegatation?			✓ (no secondary con-tainment)
265.405 - Are ignitable or reactive waste fed into the waste treatment system treated or protected from any material or or conditions which may cause it to ignite or react?	✓		
If yes, explain how.			

properly designed equipment is used & proper electrical codes observed

	YES	NO	N/A
265.406 - Are the incompatible wastes placed in the same treatment process?			
If yes, please explain.			

GENERATOR INSPECTION CHECKLIST

	YES	NO	N/A
40 CFR 262 Subpart A-General			
262.11 - Hazardous waste determination			
1) Did the generator test its waste to determine whether it is hazardous?		✓	
Is the waste hazardous? (by definition)	✓		
2) Is the generator determining that its waste exhibits a hazardous waste characteristic(s) based on its knowledge of the material(s) or processes used?	✓		
40 CFR 262 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.			
262.21 Does each manifest (or representative sample) have the following information? Please circle the missing elements.			
— a manifest document number?			
— the generators name, mailing address, telephone number and EPA I.D. Number?			
— the transporters name and EPA I.D. Number?			
— the name, address and EPA ID Number of the designated facility?			
— a description of the wastes (DOT)?			
— the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle?			
— a certification that the materials are properly classified, described, package, marked and labeled, and are in proper condition for transportation under regulations of the DOT and EPA?			
(obtain a copy of the incomplete manifests)			
40 CFR 262 - Subpart D - Recordkeeping and Reporting			
262.40 Has the generator maintained facility records since Nov. 19. 1980? (manifest, exception report and waste analysis)			✓
262.42 Has the generator received signed copies (from the TSD facility) of all the manifests for waste shipped off-site more than 35 days ago?			
If not, have Exception Reports been submitted to EPA covering any of these shipments made more than 45 days ago?			

* - 35 drums of hardened resin (presumed non haz.) to CID Refuse 3/2/81
- previous shipment before RCRA start

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

never done yet (no shipments but will be done)

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

* will be corrected

262.34 - SHORT TERM ACCUMULATION STANDARDS

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

40 CFR 265 - Subpart I Containers	YES	NO	N/A
265.170 - What type of containers are used for storage. Describe the size, type and quantity and nature of waste (e.g., 12 fifty-five gallon drums of waste acetone).			
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.			
265.172 - Are hazardous waste stored in containers made of compatible materials?	___	___	___
If not, please explain.			
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 - Is the storage area inspected at least weekly?	___	___	___
265.176 - Are containers holding ignitable and reactive waste located at least 50 feet (15 meters) away from the facility's property line?	___	___	___
265.177 - Are incompatible wasts stored separate from each other?	___	___	___

40 CFR 265 Subpart J - Tanks	YES	NO	N/A
265.190 1) What are the approximate number and size of tanks containing hazardous waste?	___	___	___
2) Identify the waste treated/stored in each tank.			
265.192 - General Operating Requirements			
1) Are the tanks maintained so that there is no evidence of past, present, or risk of future leaks?	___	___	___
If no, please explain.			
2) Are there leaking tanks?	___	___	___
3) Are all hazardous wastes or treatment reagents being placed in tanks compatible with the tank material so that there is no danger of ruptures, corrosion, leaks or other failures?	___	___	___
4) Do uncovered tanks have at least 2 feet of freeboard or an adequate containment structure?	___	___	___
5) If waste is continuously fed into a tank, is the tank equipped with a means to stop the inflow from the tank? e.g. bypass system to a standby tank	___	___	___
265.194 - Inspections			
1) Is the tank(s) inspected each operating day for			
a) discharge control equipment	___	___	___
b) monitoring equipment	___	___	___
c) level of waste in tank	___	___	___
2) Are the tanks and surrounding areas (e.g., dike) inspected weekly for leaks, corrosion or other failures?	___	___	___
3) Are there underground tanks?	___	___	___
If yes, how many and can they be entered for inspection?	___	___	___
265.198 - Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction?	___	___	___
If no, please explain.			
265.199 - Does it appear that incompatible wastes are being stored separate from each other?	___	___	___

	YES	NO	N/A
265.16 - Personnel Training			
1) Have facility personnel successfully completed a program of classroom instruction or on-the-job training within 6 months of having been employed?	___	___	___
If yes, have facility personnel taken part in an annual review of training?	___	___	___
2) Is there written documentation of the following:			
—job title for each position at the facility related to hazardous waste management and the name of the employee filling each job?	___	___	___
—type and amount of training to be given to personnel in jobs related to hazardous waste management?	___	___	___
—actual training or experience received by personnel?	___	___	___
3) Are training records kept on all employees for at least 3 years?	___	___	___
40 CFR 265 - Subpart C - Preparedness and Prevention			
265.32 Does the facility comply with preparedness and prevention requirements including maintaining:			
— an internal communications or alarm system?	___	___	___
— a telephone or other device to summon emergency assistance from local authorities?	___	___	___
— portable fire equipment?	___	___	___
— water at adequate volume and pressure to supply water hose streams, foam producing equipment, etc.	___	___	___
265.33 Is equipment tested and maintained?	___	___	___
265.34 Is there immediate access to communications or alarm systems during handling of hazardous waste?	___	___	___
265.35 Adequate aisle space?	___	___	___
If no, please explain storage pattern.			
In your opinion, do the types of waste on-site require all of the above procedures, or are some not needed: Explain.	___	___	___
40 CFR 265 - Subpart D - Contingency Plan and Emergency Procedures			
Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions or any unplanned release of hazardous waste?	___	___	___
1) Does the plan describe arrangements made with the local authorities?	___	___	___
2) Has the contingency plan been submitted to the local authorities?	___	___	___
3) Does the plan list names, addresses and phone numbers of Emergency Coordinators?	___	___	___
4) Does the plan have a list of what emergency equipment is available?	___	___	___
5) Is there a provision for evacuating facility personnel?	___	___	___
6) Was there an emergency coordinator present or on call at the time of the inspection?	___	___	___

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 ➤ •NYD002100469

HASBROUCK PLASTICS INC
PO BOX 504
HAMBURG NY 14075

INSTALLATION ADDRESS ➤ 1975 LAKEVIEW ROAD
HAMBURG NY 14075

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

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

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

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.	NYD002100469
I. NAME OF INSTALLATION	~~HASBROUCK PLASTICS INC~~
II. INSTALLATION MAILING ADDRESS	~~PO BOX 504~~ ~~HAMBURG, NY 14075~~
III. LOCATION OF INSTALLATION	~~1975 LAKEVIEW RD~~ ~~HAMBURG, NY 14075~~

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 NYD002100469 T/A 3 C 1		800818

I. NAME OF INSTALLATION

HASBROUCK PLASTICS INC.

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3 PO BOX 504

CITY OR TOWN	ST.	ZIP CODE
4 HAMBURG	NY	14075

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 5 1975 LAKEVIEW ROAD

CITY OR TOWN	ST.	ZIP CODE
6 HAMBURG	NY	14075

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)*	PHONE NO. *(area code & no.)*
2 ZITTEL ROBERT - PURCHASING AGT	716-627-2371

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 MARY ELLEN HASBROUCK

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

F = FEDERAL
M = NON–FEDERAL

m

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

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

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

- [ ] A. AIR
- [ ] B. RAIL
- [X] 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.: NYD002100469

IX. DESCRIPTION OF HAZARDOUS WASTES

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

CONTINUE ON REVERSE

I.D. – FOR OFFICIAL USE ONLY														
S													T/A	C
W	N	Y	D	0	0	2	1	0	0	4	6	9	2	1
1	2											13	14	15

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

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

1	2	3	4	5	6
F003					
7	8	9	10	11	12

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

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

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

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

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

49	50	51	52	53	54

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

- [X] 1. IGNITABLE (D001)
- [ ] 2. CORROSIVE (D002)
- [ ] 3. REACTIVE (D003)
- [ ] 4. TOXIC (D000)

DETACH

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
Robert C. Zittel	Robert C. Zittel - Purchasing Agent & Traffic Manager	8-15-80

DETACH