UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2

DATE: October 30, 2015

SUBJECT: PCB Inspections: Public School 199M
270 West 70th Street
New York, New York 10023

Public School 183Q
245 Beach 79 Street
Queens, New York 11693

FROM: James S. Haklar, Ph.D.
Environmental Engineer, Toxics Section

TO: Susan Schulz, Chief
Toxics Section

On October 2, 2015 and October 16, 2015, Toxic Substances Control Act (TSCA) polychlorinated biphenyl (PCB) inspections were performed at Public School (P.S.) 199M and P.S. 183Q, respectively. The purpose of the inspections was to observe environmental sampling in specific classrooms and areas of the school buildings. The United States Environmental Protection Agency (EPA) began both inspections by holding an opening conference with Anthony J. Sigona, Senior Project Manager, TRC; TRC is the New York City School Construction Authority's (SCA's) consultant. The following TRC sampling staff were also present at the time of the inspection:

At P.S. 199M:

- Jeremy Oestreicher
- Mikhail Kuznetsov
- Dimitriy Khmich

At P.S. 183Q:

- Jeremy Oestreicher

The EPA inspector presented credentials and issued a Notice of Inspection for each school (see Attachment 1).

Background

PS 199M is situated in a three-story brick building that was built in 1962. The school serves children from kindergarten through 5th grade and special education. The mechanical ventilation system consists of an exhaust system with perimeter heating units. The gymnasium and auditorium use supplied air.

P.S. 183Q is situated in a three-story brick building that was constructed in 1961. The school serves children from pre-kindergarten through 8th grade as well as special education. A mechanical system provides heating and ventilation to the classrooms and bathrooms, while air conditioning is provided through window units (there is a separate mechanical system for the gymnasium).

Both schools are considered to be "Pilot Schools" under the January 19, 2010 Consent Agreement and Final Order (Docket Number TSCA-02-2010-9201) between EPA, the City of New York, New York, and the SCA.

Prior to the inspections the SCA provided EPA with sampling plans for each school (see Attachment 2).

Inspection Details

P.S. 199M

At P.S. 199M EPA observed the collection of air samples as presented in the following table.

Classroom or Area	Doors Opened?	Number of Windows Opened	Carbon Filters Running?[1]
Ambient[2]	N/A	N/A	N/A
108	Yes	2	No
118	Yes	2	No
120	Yes	2	No
204	Yes	2	No
308	Yes	2	No
314	Yes	2	No
322	Yes	2	No
336	Yes	2	No
Gymnasium	1 Door	6	No
Library	Yes	4	No

EPA discussed the status of the carbon filters with TRC and became aware that the carbon had been replaced. Subsequent to the inspection EPA requested the sampling data for the used carbon and SCA provided this information (see Attachment 3).

The following deviation from the TRC sampling plan was observed during the inspection:

[1] Samples were collected without the carbon filters running to determine if the filters are still needed.
[2] The ambient sample location was outside of Room 108.

- The number of windows actually opened in most locations differed from that proposed in the sampling plan.

P.S. 183Q

During this inspection EPA observed the collection of wipe and bulk (caulk) samples from the following locations.

Location[3]	**Sample Type**	**Caulk Type**
Stairwell B, 1st Floor	Wipe [4]	Firestop Penetration Caulk
3rd Floor Northeast Corner	Bulk	Display Frame Caulk
Stairwell C, 3rd Floor	Bulk	Door Frame caulk
Classroom 309	Bulk	Door Frame Caulk
Stairwell D, 3rd Floor	Bulk	Door Frame Caulk
Classroom 245	Bulk	Door Frame Caulk
2nd Floor Northwest Corner[5]	Bulk	Display Frame Caulk
Classroom 207	Bulk	Door Frame Caulk
Stairwell B, 2nd Floor	Bulk	Door Frame Caulk
1st Floor North Corridor	Bulk	Expansion Seam Caulk
1st Floor South Corridor	Bulk	Expansion Seam Caulk
Stairwell A, 1st Floor	Bulk	Door Frame Caulk

The following deviations from TRC sampling plan were observed during the inspection:

- TRC did not use stainless steel scalpels for cutting the caulk. Caulk was cut using a box cutter with a retractable blade. The blade ends were reversed from one sample location to the next and the blade retracted into the handle between locations. This procedure increases the chances of cross contamination occurring within the box cutter handle.

- Instead of stainless steel scalpels, sample gloves (dedicated to each sample location) were used to remove the caulk and place it in the sample jar.

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[3] Samples were collected from the specified locations in the order presented in the table.
[4] TRC had performed most of the wipe sampling prior to the start of the inspection.
[5] Erroneously identified in the sampling plan as the 2nd floor northeast corner.

Conclusion

Field activities should be consistent with those presented in the sampling plans. The EPA inspector will follow up with the SCA regarding this issue.

Attachments

1. Notices of Inspection
2. Sampling Plans
3. P.S. 199M PCB Carbon Filter Sampling and Replacement Report

ATTACHMENT 1

Notices of Inspection

United States Environmental Protection Agency
Washington, D.C. 20460
Toxic Substances Control Act

EPA

Form Approved
OMB No. 2070-0007
Approval Expires 10-31-92

NOTICE OF INSPECTION

The public reporting burden for this collection of information is estimated to average 5 minutes per response. This estimate includes time for reviewing instructions, searching existing data sources, gathering and maintaining the needed data, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information to the Chief, Information Policy Branch (PM-223), US Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460, and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503, marked ATTENTION: Desk Officer for EPA.

1. Investigation Identification			2. Time	3. Firm Name
Date: 10-2-15	Inspector No.: F16426	Daily Seq. No.: 1	9:00	PUBLIC SCHOOL 199M
4. Inspector Address: U.S. EPA REGION 2, 2890 WOODBRIDGE AVE. EDISON, NJ 08837-3679				5. Firm Address: 270 WEST 170TH STREET NEW YORK, NY 10023

REASON FOR INSPECTION

Under the authority of Section 11 of the Toxic Substances Control Act:

☒ For the purpose of inspecting (including taking samples, photographs, statements, and other inspection activities) an establishment, facility, or other premises in which chemical substances or mixtures or articles containing same are manufactured, processed or stored, or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) and any conveyance being used to transport chemical substances, mixtures, or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls, and facilities) bearing on whether the requirements of the Act applicable to the chemical substances, mixtures, or articles within or associated with such premises or conveyance have been complied with.

☐ In addition, this inspection extends to *(Check appropriate blocks):*

- ☐ A. Financial data
- ☐ B. Sales data
- ☐ C. Pricing data
- ☐ D. Personnel data
- ☐ E. Research data

The nature and extent of inspection of such data specified in A through E above is as follows:

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Inspector Signature		Recipient Signature	
Name: JAMES S. HAKLAR		Name: Anthony Sigona	
Title: ENVI. ENGR.	Date Signed: 10-2-15	Title: Senior Proj. Mgmt	Date Signed: 10-2-15

EPA 7740-3 Rev (8-91)

Inspection File

US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

NOTICE OF INSPECTION

1. INVESTIGATION IDENTIFICATION			3. FACILITY NAME
DATE	INSPECTION NO.	DAILY SEQ. NO.	P.S. 183 DR. RICHARD R. GREEN
10-16-15	F16426	1	

2. INSPECTOR'S ADDRESS

U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION II
PESTICIDES & TOXIC SUBSTANCES BRANCH-MS-105
2890 WOODBRIDGE AVE. - BLDG 10
EDISON, NEW JERSEY 08837-3679

4. FACILITY ADDRESS

2-45 BEACH 79 STREET
QUEENS, NY 11693

For Internal EPA Use. Copies may be provided to recipient as acknowledgment of this notice.

REASON FOR INSPECTION

Under the authority of Section 11 of the Toxic Substances Control Act:

☒ For the purpose of inspecting (including taking samples, photographs, statements, and other inspection activities) an establishment, facility, or other premises in which chemical substances or mixtures, articles containing same are manufactured, processed, stored or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) and any conveyances being used to transport chemical substances, mixtures, or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls, and facilities) bearing on whether the requirements of the Act are applicable to the chemical substances, mixtures, or articles within, or associated with, such premise or conveyance have been complied with.

☐ In addition, this inspection extends to (check appropriate blocks):

- ☐ A. Financial data
- ☐ B. Sales data
- ☐ C. Pricing data
- ☐ D. Personnel data
- ☐ E. Research data

The nature and extent of inspection of such data specified in A through E above is as follows:

INSPECTOR'S SIGNATURE		RECIPIENT'S SIGNATURE	
NAME JAMES S. HAKLAR		NAME Anthony Sigma	
TITLE ENVIRONMENTAL ENGINEER	DATE SIGNED 10/16/15	TITLE Senior Project manager	DATE SIGNED 10/16/2015

EPA FORM 7740-3 (REVISED JULY 1997) CORE TSCA --- PREVIOUS VERSIONS ARE OBSOLETE FACILITY COPY

*U.S. GPO: 2000-468-422/45055

ATTACHMENT 2

Sampling Plans

PCB PILOT PROGRAM LONG-TERM MONITORING
P.S. 199M OCTOBER 2015 AIR SAMPLING PLAN

OBJECTIVE

Conduct PCB air sampling in specific classrooms and areas of the building to determine airborne PCB concentrations without the carbon air filtration units running. All carbon air filtration units will be shut down for two weeks prior to the air sampling.

AIR SAMPLING LOCATIONS

Air samples will be collected from the following targeted locations to represent PCB air concentrations at the School:

- Classrooms 108, 118, 120, 204, 308, 314, 322 and 336.
- Gymnasium and Library.
- Outdoors (ambient air)

Quality Assurance Samples – one duplicate sample, one front/back samples to evaluate apparent collection efficiency (ACE), one field spike and one field blank.

Sampling will be performed with either 4 windows in each classroom partially opened (approx. 6 inches) or with the air conditioning units turned on with fresh air vent open, classroom doors open (as per school policy), and supply and exhaust ventilation equipment operating normally. Exhaust ventilation rates will be measured in the locations indicated above during sampling activities. Temperature readings will also be collected and data logged throughout the sampling period in the referenced sampling locations.

ANALYTICAL METHOD

Air samples will be analyzed by Pace Analytical Laboratory in accordance with EPA Method TO-10A to achieve a detection limit of approximately 50 nanograms per cubic meter of air (ng/m^3). Samples will be analyzed using standard turnaround time. Data acceptability will be based upon less than 10% flow rate drift during sample collection and review of blank and surrogate sample results. Data not meeting these criteria will be voided.

TASKS & TENTATIVE SCHEDULE

Air sampling will be performed on Friday, October 2, 2015 in the locations listed above. Mobilization of equipment and sampling materials for air sampling will begin at approximately 8:00 pm. Upon completion of the air sampling, equipment and materials will be demobilized and removed from the building. All carbon air filtration units will be shut down and kept turned off for two weeks prior to the air sampling. Upon completion of the air sampling, all of the units will be turned back on.

PCB PILOT PROGRAM LONG-TERM MONITORING
P.S. 183Q SEPTEMBER 2015 AIR, WIPE, & BULK SAMPLING PLAN

1.0 OBJECTIVES

Conduct PCB air sampling in three (3) locations to confirm that conditions are consistent with those found in the last round of testing and that airborne PCB concentrations are still below applicable EPA guidance values.

Collect bulk samples of replacement caulking where PCB-containing caulk had been removed and replaced in the spring of 2015.

Conduct PCB wipe sampling on the surface of PCB-containing caulking that had been encapsulated in the spring of 2015.

2.0 AIR SAMPLING

Air samples will be collected from the following locations:

- 3rd Floor – South corridor and Stair B
- 2nd Floor – Stair D
- Outside – Ambient
- Quality Assurance Samples - one duplicate sample, one front/back sample to evaluate apparent collection efficiency (ACE), one field spike and one field blank.

Sampling will be performed with four (4) windows in each classroom partially opened, doors closed (as per school policy), and supply and exhaust ventilation operating normally. The 2nd and 3rd floor exit doors at each of the stairwells will be opened for 5 to 10 minutes per hour of sampling to be more representative of normal air flow that occurs between the corridors and the stairwells during a typical school day. Temperature readings will also be collected and data logged throughout the sampling period in the referenced sampling locations.

2.1 Analysis Method

Air samples will be analyzed by Pace Analytical Laboratory in accordance with EPA Method TO-10A to achieve a detection limit of approximately 50 nanograms per cubic meter of air (ng/m^3). Samples will be analyzed using a standard turnaround time. Data acceptability will be based upon less than 10% flow rate drift during sample collection and review of blank and surrogate sample results. Data not meeting these criteria will be voided.

3.0 BULK SAMPLING

A total of eleven (11) composite bulk samples will be collected. One (1) composite bulk sample of replacement caulk will be collected from each of the following locations:

- 1st floor north corridor - expansion seam caulk [a]

- 1st floor south corridor - expansion seam caulk [b]
- Display Frame Caulk, 2nd Floor northeast corner [a]
- Classroom 207 - door frame caulk [b]
- Classroom 245 – door frame caulk [c]
- Display Frame Caulk, 3rd Floor northeast corner [a]
- Classroom 309 - door frame caulk [b]
- Stairwell A, 1st floor - door frame caulk [b]
- Stairwell B, 2nd floor - door frame caulk [a]
- Stairwell C, 3rd floor - door frame caulk [a]
- Stairwell D, 3rd floor - door frame caulk [b]

[a] – substrate encapsulated using Macropoxy 646
[b] – substrate encapsulated using Sikagard 62
[c] – substrate not encapsulated with any product

Caulk samples shall be collected by physically removing sections of caulk using stainless steel scalpels and tweezers. Sampling equipment shall be dedicated for each sample collected. Three (3) sub-samples (each approximately 10 grams in weight) of each homogeneous material were collected to form a composite sample. Each sub-sample was placed in a separate, pre-cleaned glass jar with a Teflon-lined cap for submission to the laboratory. All sample locations will be repaired using Dow Corning® 790 Silicone Building Sealant.

3.1 Analysis Method

Bulk samples will be analyzed by Pace Analytical Laboratory using gas chromatography (GC) in accordance with USEPA SW846 Method 8082 with five peak match following Soxhlet Extraction (SW846 Method 3540C). Samples will be analyzed using a standard turnaround time.

4.0 WIPE SAMPLING

A total of six (6) wipe samples shall be collected. One (1) wipe sample shall be collected from the surface of encapsulated caulk in each of the following locations:

- Cafeteria - window frame caulk, north side [a]
- Cafeteria - window frame caulk, south side [b]
- Stairwell B - firestop penetration caulk, 1st floor [a]
- Stairwell C - firestop junction box caulk, 2nd floor [a]
- Stairwell D - firestop junction box caulk, 2nd floor [b]
- 3rd floor south corridor – firestop junction box caulk [b]

[a] – caulk encapsulated using Macropoxy 646
[b] – caulk encapsulated using Sikagard 62

Samples shall be collected utilizing PCB-free gauze wipes wetted with hexane. In each sample location, an approximately 100 square centimeter (cm^2) size area will be wiped, in accordance with American Society for Testing and Materials (ASTM) D6661-10, *Standard Practice for Field Collection of Organic Compounds from Surfaces Using Wipe Sampling*. Samples shall be collected

only from the encapsulated caulk material surfaces, using customized sampling templates, utilizing Scotch-Blue™ Painter's Tape to mask the non-encapsulated surfaces.

4.1 Analysis Method

Wipe samples will be analyzed by Pace Analytical Laboratory using gas chromatography (GC) in accordance with USEPA SW846 Method 8082 with five peak match following Soxhlet Extraction (SW846 Method 3540C). Samples will be analyzed using a standard turnaround time.

TENTATIVE SCHEDULE

Air sampling is scheduled to be performed on Friday, September 25, 2015, in the locations listed above, and will begin at approximately 5:00 pm. Bulk and wipe sampling is scheduled to performed on Friday, October 16, 2015, beginning at around 5:00 pm. Upon completion of the sampling efforts, all equipment and materials will be demobilized and removed from the building.

ATTACHMENT 3

P.S. 199M PCB Carbon Filter Sampling and Replacement Report

1430 Broadway
10th Floor
New York, NY 10018

212.221.7822 PHONE
212.221.7840 FAX

www.TRCsolutions.com

October 5, 2015

Mr. Alexander Lempert
Director, IEH Division
New York City School Construction Authority
30-30 Thomson Avenue
Long Island City, NY 11101

Re: P.S. 199M PCB Carbon Filter Sampling Results
Draft Summary Report
LLW# 063090; IEH Job# 39272

Dear Mr. Lempert,

At the request of the New York City School Construction Authority (NYCSCA), TRC Engineers, Inc. (TRC) has prepared this Summary Report for PCB carbon filter sampling event on August 7, 2015 and the replacement of carbon filters at P.S. 199M that was performed between August 17 and 19, 2015.

Carbon Filter Sampling Procedures

TRC collected six (6) PCB bulk samples of carbon from representative air filtration units that were analyzed for PCB content. Samples were collected from two air filters on each of the three floors. On each floor, air filters from rooms which historically have had among the highest average airborne PCB concentrations since the carbon filtration units were installed in 2011. Core samples were collected from the approximate mid-height on the filter canisters. Each sample was placed in a separate, pre-cleaned amber glass jar, with a Teflon-lined cap, for submission to the laboratory.

Carbon samples were collected from the air filter units in the following locations:

- 1st Floor – The southeast corner of Classroom 116 and the southwest corner of Classroom 118.
- 2nd Floor – The northeast corner of the gymnasium and the northwest corner of the library.
- 3rd Floor – The southeast corner of Classroom 312 and the northwest corner of Classroom 314.

The laboratory was directed to extract and analyze each sample via EPA Method 8082 and report the following Aroclors: Aroclor 1016, Aroclor 1221, Aroclor 1232, Aroclor 1242, Aroclor 1248, Aroclor 1254 and Aroclor 1260.

All samples were collected and containerized in accordance with USEPA protocols and sample methodology. Each container was properly labeled, preserved, and placed in a cooler for transport via FedEx to Pace Analytical, Inc. a NYSDOH ELAP-certified analytical laboratory for Soxhlet extraction followed by GC/MS. Standard chain-of-custody and sample storage and shipping procedures were followed. Samples were analyzed via USEPA Method 8082.

PCB Sample Results

TRC collected a total of six (6) PCB bulk samples from carbon filters in the gymnasium, the library and in Classrooms 116, 118, 312 and 314. The final validated laboratory results for total PCBs for the carbon filter samples ranged from 10.21 parts per million (ppm) to 47.4 ppm. All six (6) of the sample results were above the EPA PCB Remediation Waste Criteria of 1 ppm, and below the EPA PCB Bulk Product Waste Criteria of 50 ppm. Please refer to Attachment 1 for a summary of the carbon filter sampling results.

Carbon Air Filter Replacement

Between August 17 and 19, 2014, Kiss Construction removed and replaced a total of 62 carbon filters throughout the school. The spent carbon air filters were subsequently sent to Clean Earth of New Jersey for disposal. See Attachment 2 for a copy of the waste profile and manifest.

If you have any questions, please do not hesitate to contact us at (212) 221-7822.

Sincerely,
TRC Engineers, Inc.

John P. Springston, CIH, CSP, FAIHA
Industrial Hygiene Program Manager

Anthony J. Sigona, PE, CSP, LEED AP
Senior Project Manager

Attachments:

Attachment 1 – Carbon Filter PCB Bulk Sample Results
Attachment 2 – Waste Profile and Manifest

ATTACHMENT 1

CARBON FILTER PCB BULK SAMPLE RESULTS

Summary of Analytical Results for Carbon Filter Samples -- August 2015
School 199M
Manhattan, New York

Analysis	Analyte	Action Level		Sample ID:	199-116-CF-POST-1	199-118-CF-POST-2	199-GYM-CF-POST-3	199-LIB-CF-POST-4	199-312-CF-POST-5	199-314-CF-POST-6
				Sample Description:	Carbon Filter	Carbon Filter	Carbon Filter	Carbon Filter	Carbon Filter	Carbon Filter
				Sample Location:	SE Corner of Room 116 on the 1st Floor	SW Corner of Room 118 on the 1st Floor	NE Corner of Gym on the 2nd Floor	NW Corner of Library on the 2nd Floor	SE Corner of Room 312 on the 3rd Floor	NW Corner of Room 314 on the 3rd Floor
				Sample Date:	8/7/2015	8/7/2015	8/7/2015	8/7/2015	8/7/2015	8/7/2015
PCBs (mg/kg)	Aroclor 1016	N/A	N/A		1.00 U	1.00 U	1.00 U	3.00 U	2.96 U	1.00 U
	Aroclor 1221	N/A	N/A		1.00 U	1.00 U	1.00 U	3.00 U	2.96 U	1.00 U
	Aroclor 1232	N/A	N/A		1.00 U	1.00 U	1.00 U	3.00 U	2.96 U	1.00 U
	Aroclor 1242	N/A	N/A		1.00 U	1.00 U	1.00 U	3.00 U	2.96 U	1.00 U
	Aroclor 1248	N/A	N/A		**4.69 J**	**4.60 J**	**8.85 J**	**25.3 J**	**10.7 J**	**7.39 J**
	Aroclor 1254	N/A	N/A		**5.52 J**	**6.05 J**	**13.00 J**	**22.1 J**	**17.9 J**	**11.20 J**
	Aroclor 1260	N/A	N/A		1.00 U	1.00 U	1.00 U	3.00 U	2.96 U	1.00 U
	Aroclor 1262	N/A	N/A		1.00 U	1.00 U	1.00 U	3.00 U	2.96 U	1.00 U
	Aroclor 1268	N/A	N/A		1.00 U	1.00 U	1.00 U	3.00 U	2.96 U	1.00 U
	Total PCBs	1*	50**		**10.21 J**	**10.65 J**	**21.85 J**	**47.4 J**	**28.6 J**	**18.59 J**

Notes:

mg/kg - milligrams per kilogram or parts per million (ppm).

J - Estimated value.

N/A - Not applicable.

U - Compound was not detected at specified quantitation limit.

Values in **Bold** indicate the compound was detected.

Values shown in Bold and shaded type exceed one of more of the listed Criteria.

PCBs - Polychlorinated Biphenyls.

* - EPA PCB Remediation Waste Criteria.

** - NYS PCB Hazardous Waste Criteria.

ATTACHMENT 2

WASTE PROFILE AND MANIFEST

Waste Profile Renewal

Broker:
BROOKSIDE ENVIRONMENTAL INC
22 OCEAN AVE
COPIAGUE, NY 11726
Dick Taylor 516.377.6300

Generator:
PS 199M
270 W 70th St.
New York, NY 10023

Dear Generator / Customer:

This notification is required by 40 CFR part 264.13 / 265.13 and the Waste Analysis Plan of the above named TSDF and must be repeated annually for each waste stream managed by the named TSDF.

Wastestream Identification

Profile Number: 133082920
Approval Number:
Description:
Waste Codes: 27

Entry Date: 28-MAY-13
Expiration Date: 29-MAY-15

Sign and date this original to:

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

Certified By	Title	Date
	Senior Director	8/18/15

Please check the appropriate box below:

☐ **RENEW WITHOUT CHANGE** If profile entry date is prior to 1999, a new profile (including UST form, if applicable) must be completed and returned with this renewal. Sign and Return.

☒ **RENEW WITH CHANGE** Complete new profile and indicate changes in waste generating process and/or wastestream that are different from information last submitted. Sign and Return. - Revised PCB concentration.

☐ **CANCEL** this wastestream approval. Sign and Return.

If you should have any questions, please call your broker or Sales Representative.

TSDF Management: (TSDF LAB USE ONLY)
Notes:

Form Code
Inbound Code
Unit Cost
3rd Auth.

Cons. Code
Approval #
Class Code
Unit Charge

Approved ☐ Rejected ☐ Authorized By: _____ Date: 2nd Auth: :

Global Job # _____

Sales Rep _____

C. Waste Composition/Characteristics (continued)

11. The waste represented in this profile is generated as a result of the corrective response taken under the Federal Underground Storage Tank Regulation 40 CFR 280. ☐ Yes ☒ No
12. Is the waste a dioxin bearing waste? ☐ Yes ☒ No
13. Is the waste a treatment residue from a previously listed or characteristic hazardous waste? ☐ Yes ☒ No
14. Is there a nuisance level of odor associated with this waste? ☐ Yes ☒ No
15. Are there any special handling instructions for management of this waste? ☐ Yes ☒ No
16. Have any odor suppressing foams or absorbents been added to the waste? ☐ Yes ☒ No
17. If yes to any of the above questions, please explain (attach an additional sheet if necessary):

_____

_____

D. Generator Certification

1. I certify that the waste represented by this profile is not a listed hazardous waste, nor does it contain a listed hazardous waste, nor does it exhibit any characteristics of a hazardous waste as defined by 40 CFR 261. ☒ Yes ☐ No
2. I certify that this waste profile and all attachments contain true and accurate descriptions of the waste material. ☒ Yes ☐ No
3. I certify that all relevant information in possession of the Generator pertaining to known or suspected hazards with regard to the waste has been disclosed to Clean Earth. ☒ Yes ☐ No
4. I certify that all changes that occur in the characteristics of the waste will be identified by the Generator and disclosed to Clean Earth prior to providing the waste to Clean Earth. ☒ Yes ☐ No
5. I certify that the analytical data attached hereto are derived from testing representative sample(s) as referenced in 40 CFR 261.20 or an equivalent state regulatory provision. ☒ Yes ☐ No ☐ N/A
6. For sites that contain "clean fill," the undersigned certifies that a site investigation was conducted and that the soil was characterized according to the proposed Clean Earth facility(s) acceptance criteria for soil classification as "clean fill" and where applicable in accordance with the Pennsylvania Management of Fill Policy. ☐ Yes ☐ No ☒ N/A
7. The undersigned has determined the non-hazardous status of the said waste is in accordance with 40 CFR 262.11. Should, at any time after delivery, the material accepted by Clean Earth be found to be non-conforming to the information certified in this profile and represented by documentation attached hereto, it becomes the responsibility of the Generator/Agent to remove the waste from the designated Clean Earth facility within five (5) days of notification. Notification is to be verbal followed by written notification, overnight receipted. It is the Generator's/Agent's responsibility to abide by all Federal, State and Local regulations associated with the removal of their waste. If the waste is not removed within the specified time period, said disposal shall be arranged by a Clean Earth representative and billed to the Generator/Agent at cost plus basis. Furthermore, the Generator/Agent will be responsible for any and all costs for decontamination required by the Clean Earth facility that is related to the Generator's/Agent's material and all liability for such nonconforming waste shall revert to Generator/Agent. ☒ Yes ☐ No

*Certification

Signature: _____ Date: 8/18/15

Name (type or print): Alexander Lempert Company: NYC School Construction Authority

*If someone other than the Generator is signing this profile or intends to sign any paperwork (which includes, but is not limited to, additional certifications, manifests, etc.) pertaining to this waste profile, authorization from the Generator, on the Generator's letterhead, must be supplied to Clean Earth prior to acceptance of waste material.

E. Clean Earth Waste Approval Decision

1. Treatment Option(s) _____
2. Proposed Treatment Facility(s) _____
3. Supplemental information (special handling, hours of acceptance, etc.): _____

_____

_____

4. Approval decision: ☐ Approved ☐ Denied Approved tonnages: _____

4a. If denied, please indicate the reason in the space provided: _____

_____

5. Approval Signature: _____ Date: _____
6. Facility Manager's Signature: _____ Date: _____

PCB CERTIFICATION

I, Alexander Lempert (generator/title), certify to Clean Earth North Jersey (CE Facility) that within my company, I have knowledge concerning the accuracy of the following representations and that the following representations are correct to the best of my knowledge.

1. Customer has historic PCB contamination, and cannot attribute the contamination to any particular source. (Check applicable box below.)

   ☐ I am unable to locate any information which indicate that a spill of PCBs occurred subsequent to February 17, 1978, which could have contaminated the waste covered by this certification, and the actual PCB concentration of the waste is less than 50 ppm.

   ☐ Any PCBs detected in the waste covered by this certification resulted from a spill of PCBs that occurred prior to February 17, 1978, and the actual PCB concentration of the waste is less than 50 ppm.

2. Spill of PCB material occurred after February 17, 1978, and records or generator knowledge indicate that the contaminant source had concentrations less than 50 ppm. Pertinent sampling data to this certification must be attached. (Check applicable box below.)

   ☐ The waste covered by this certification has an actual concentration of PCBs less than 50 ppm per generator knowledge or analytical results.

   ☐ The source of the PCB contamination analyzed and found to have a PCB concentration less than 50 ppm.

3. Remediation Waste (40CFR 761.61)

   ☐ The waste covered by this certification is remediation waste, as defined by §761.3, from a cleanup managed under the self-implementing approach, §761.61 (a), with a PCB concentration less than 50 ppm.

   ☒ The waste covered by this certification is cleanup waste regulated under §761.61 (a)(5)(v). The waste may contain PCBs at any concentration and was generated during the cleanup of PCB remediation waste under the self-implementing approach.

   ☒ Generator to attach copy of self-implementing notification submitted under §761.61 (a)(3)(i) and copy of approval of the notification.

PPMW	Less Than	Actual Level
4,000		
4,000		
21,400		
80,000		
80		
800		
80,000		
400		
400		
960		
~~56,000~~		
4,800		
880		
800		
1,360		
1,360		
400		
560		
480		
1,200		

Constituent
Arsenic
Cadmium
Chromium +6
Lead
Mercury
Beryllium
Nickel
Benzene
Chlorobenzene
Cumene
Ethylene Glycol
Methanol
Methylene Chloride
Methyl Ethyl Ketone
Methyl Isobutyl Ketone
Phenol
Tetrachloroethylene
Toluene
Trichloroethylene
Xylene

*mg/Kg

arth of North Jersey is complete and is an accurate representation

Certification

I certify that the information provided to Clean E
of the waste.