July 3, 2000
MIR 000 022 400
Review of Document Titled, "SRS Environmental QA/QC Program"
(Received on March 28, 2000)
Prepared by Sue Rodenbeck Brauer, Region 5 RCRA Used Oil Expert

Comparison of SRS Environmental QA/QC Program with 40 CFR 279.55, Analysis Plan

Analytical requirements of 40 CFR 279.53 and 40 CFR 279.72.

(a) Rebuttable presumption for used oil in 40 CFR 279.53.
(1) Whether samples analyses or knowledge will be used:
•**generator waste characterization report for knowledge (p. 5-1);**
•approval process annually (p. 5-2) does not include total halogens and sets maximum for PCBs as 50 ppm (should be less than 2 ppm to avoid TSCA regulation);
•Figure 5.C does not list total halogens as a required analysis for approval;
•Figure 5.D does not specify total halogens or any other analyte;
•**Figure 5.G lists % chlorine (without an identified analytical method) as an analysis performed on each in-bound shipment.**
•Figure 5.H does not specify whether quantitative results are recorded (it's a blank form).

(2) (i) sampling method: Figure 5.E gives sample method as "SW-846" and sample equipment as "coliwasa/tube sampler, weighted bottle, bomb, or tank sampling ports."
(ii) frequency of sampling: Figure 5.G lists % chlorine as an analysis performed on each in-bound shipment.
(iii) methods used to analyze used oil for parameters specified in 40 CFR 279.53 (halogenated hazardous constituents listed in App. VIII of Part 261):
•From Figure 5.C (pre-approval) for waste oils, TCLP Semivolatiles 3510 & 8270, TCLP Volatiles Method 8240, PCBs 8080;
•From Figure 5.C (pre-approval) for process & ground waters, PCBs 8080, TCLP Semivolatiles 3510 & 8270, TCLP Volatiles 8240, Herbicides 8150, Pesticides 3510 & 8080; and,
•From Figure 5.C (pre-approval) for sludges, PCBs 8080, TCLP Semivolatiles 3510 & 8270; TCLP Volatiles 8240.
[Does this cover all the halogenated hazardous constituents in App. VIII to Part 261? NO, pages 5-3 and 5-4 list "semi-

volatiles/volatiles-defined under 40 CFR Section 261.21, the characteristic of ignitability, but the organic constituents for the characteristic of toxicity from 40 CFR 261.24 are listed with the exceptions of benzene, hexachlorobutadiene, and hexachloroethane. It's not a complete list of halogenated constituents from App. VIII of Part 261.]

(3) The type of information that will be used to determine the halogen content of the used oil. It may be inferred that waste profile forms completed by generators and % chlorine by analysis will be used, but the "rebuttable presumption" is not addressed per se in the QA/QC Program.

(b) On-specification used oil fuel in 40 CFR 279.72
A processor/re-refiner may determine that used oil that is to be burned for energy recovery meets the fuel specifications of 40 CFR 279.11 by performing analyses or obtaining copies of analyses or other information documenting that the used oil fuel meets the specifications.
The plan must specify the following if 40 CFR 279.72 is applicable (section 5.6.2 on page 5-21 suggests that SRS Environmental ships on-specification used oil fuel)

(1) whether sample analyses or other information will be used to make this determination (section 5.6.3 suggests that analyses are relied upon to make the determination)

(2) If sample analyses are used to make this determination, then
(i) The sampling method used to obtain representative samples to be analyzed: **Not provided in section 5.6.2 and 5.6.6.**
(ii) whether used oil will be sampled and analyzed after any processing/re-refining. Section 5.6.3 states that on-spec oil will be analyzed for BS&W, Corrosivity, Sulfur Test, Ignitability, toxicity characteristics metals, total halogens (TX), and PCBs.) As summarized in section 5.6.2, RCRA regulations require analysis for As, Cd, Cr, Pb, flash point, and TX. Figure 5.N does not include any metals. Why are there three different representations (5.6.3, 5.6.2, and 5.N) of what metals are analyzed?
(iii) The frequency of sampling to be performed, and whether analyses will be conducted on- or off-site. In Section 5.6.2 on page 5-22, it is not clear who (on- or off-site) performs monthly analyses on each holding tank. In Section 5.6.4 on page 5-22, it

is not clear whether the independent laboratory analyses are conducted on- or off-site.
(iv) the methods used to conduct the analyses. Section 5.6.3 and Figure 5.N are not consistent with respect to flash point determination (ignitability by method 1010 and method 1010 or 1020, respectively).

(3) The information to be used to make the on-spec used oil fuel determination. SRS apparently relies exclusively on analyses.

F:\user\sbrauer\usedoil\sybill\Used Oil Analysis Plan regulatory review.wpd

RTI LABORATORIES, INC.
Chemical, Metallurgical & Environmental Testing

ACCREDITED

REPORT OF ANALYTICAL SERVICES

TO:
SRS Environmental
3345 Greenfield Road
Melvindale, MI 48122

Report Date: 01/13/00

Lab Number: 00-0015A

Customer P.O. #:

Customer #:

RTI Quote #:

Attn:
Gary Berndt

PART / SAMPLE IDENTIFICATION:

Monthly Oil Sampling - Dec/Jan 2000
1 Oil Sample

Received: 01/05/00 Tests Completed: 01/13/00 Reported: 01/13/00

WORK REQUESTED / PERFORMED:

TCLP METALS, F-SCAN, FLASHPOINT, TOTAL HALOGENS
BTU, SULFUR CONTENT, ASH CONTENT, BS&W, PCB

THE RESULTS OF ALL TESTS and/or ANALYSES REQUESTED ARE REPORTED ON THE PAGES WHICH FOLLOW.

Number of pages including this page 7

APPROVED BY: _____ REPORTED BY: _____

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RTI LABORATORIES, INC.
Chemical, Metallurgical & Environmental Testing

CONFIDENTIAL REPORT OF EVALUATION

Submitted by : Gary Berndt

Lab. No. : 00-0015A

Client : SRS Environmental
Melvindale, MI

Report Date : 01/13/00

Sample ID :

Monthly Oil Sampling - Dec/Jan 2000
1 Oil Sample

Object :

TCLP METALS, F-SCAN, FLASHPOINT, TOTAL HALOGENS
BTU, SULFUR CONTENT, ASH CONTENT, BS&W, PCB

Results and Discussion :

SAMPLE IDENTIFICATION	SAMPLE MATRIX
1 - Dec/Jan 2000 1/4/00	Oil

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Object: TCLP METALS, F-SCAN, FLASHPOINT, TOTAL HALOGENS
BTU, SULFUR CONTENT, ASH CONTENT, BS&W, PCB

Report Date: 01/13/00
Lab. No. : 00-0015A

Sample ID: Monthly Oil Sampling - Dec/Jan 2000 1/4/00

PARAMETERS	METHOD	MDL (ppm)	LOD-S (ppm)	Results (ppm)
F-SCAN (F001-F002)				
Tetrachloroethylene	8260	0.001	1.0	ND
Trichloroethylene	8260	0.001	1.0	ND
Methylene chloride	8260	0.001	1.0	ND
1,1,1-trichloroethane	8260	0.001	1.0	ND
Carbon tetrachloride	8260	0.001	1.0	ND
Chlorinated Fluorocarbons	8260	0.001	1.0	ND
Chlorobenzene	8260	0.001	1.0	ND
1,1,2-trichloro-1,2,2-trifluoroethane	8260	0.001	1.0	ND
1,2-Dichlorobenzene	8260	0.001	1.0	ND
1,3-Dichlorobenzene	8260	0.001	1.0	ND
1,4-Dichlorobenzene	8260	0.001	1.0	ND
Trichlorofluoromethane	8260	0.001	1.0	ND
1,1,2-trichloroethane	8260	0.001	1.0	ND

PARAMETERS	METHOD	MDL (ppm)	LOD-S (ppm)	Results (ppm)
F-SCAN (F003)				
Xylenes	8260	0.003	1.0	7.4
Acetone	8260	0.001	1.0	ND
Ethyl acetate	8260	0.001	1.0	ND
Ethyl benzene	8260	0.001	1.0	1.4
Ethyl ether	8260	0.001	1.0	ND
Methyl isobutyl ketone	8260	0.001	1.0	ND
n-butyl alcohol	8260	0.001	1.0	ND
Cyclohexanone	8270	0.001	1.0	ND
Methanol	8015	0.100	1.0	ND

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CONFIDENTIAL REPORT OF EVALUATION

Submitted by: Gary Berndt
Client: SRS Environmental
Object: TCLP METALS, F-SCAN, FLASHPOINT, TOTAL HALOGENS
BTU, SULFUR CONTENT, ASH CONTENT, BS&W, PCB

Report Date: 01/13/00
Lab. No. : 00-0015A

Sample ID: Monthly Oil Sampling - Dec/Jan 2000 1/4/00

PARAMETERS	METHOD	MDL (ppm)	LOD-S (ppm)	Results (ppm)
F-SCAN (F004)				
o-Cresol	8270	0.001	1.0	ND
m-Cresol	8270	0.001	1.0	ND
p-Cresol	8270	0.001	1.0	ND
Nitrobenzene	8270	0.001	1.0	ND

PARAMETERS	METHOD	MDL (ppm)	LOD-S (ppm)	Results (ppm)
F-SCAN (F005)				
Toluene	8260	0.001	1.0	1.8
Methyl ethyl ketone	8260	0.001	1.0	27
Carbon disulfide	8260	0.001	1.0	ND
Isobutanol	8260	0.001	1.0	ND
Pyridine	8270	0.001	1.0	ND
Benzene	8260	0.001	1.0	ND
2-ethoxyethanol	8260	0.001	1.0	ND
2-nitropropane	8260	0.001	1.0	ND

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Submitted by: Gary Berndt
Client: SRS Environmental
Object: TCLP METALS, F-SCAN, FLASHPOINT, TOTAL HALOGENS
BTU, SULFUR CONTENT, ASH CONTENT, BS&W, PCB

Report Date: 01/13/00
Lab. No. : 00-0015A

Sample ID: Monthly Oil Sampling - Dec/Jan 2000 1/4/00

PARAMETER	RESULTS
Ignitability (Flash point, deg. F)	>200
Total Halogens (ppm)	1331
Total Sulfur (percent)	0.25
BS&W (percent)	1.0
Ash Content (percent)	0.18
BTU (BTU/lb)	19117

TCLP METALS PORTION

PARAMETERS	METHOD	MDL (ppm)	LOD-S (ppm)	Results (ppm)	Regulatory Limit (ppm)
METALS	3020A (Sample Preparation)				
Arsenic	6010	0.20	1.00	ND	5
Barium	6010	0.01	0.25	3.75	100
Cadmium	6010	0.01	0.25	ND	1
Chromium	6010	0.02	0.50	1.15	5
Lead	6010	0.05	1.25	ND	5
Mercury	7470A	0.01	0.01	ND	0.2
Selenium	6010	0.20	1.00	ND	1
Silver	6010	0.01	0.50	ND	5

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Submitted by: Gary Berndt
Client: SRS Environmental
Object: TCLP METALS, F-SCAN, FLASHPOINT, TOTAL HALOGENS
BTU, SULFUR CONTENT, ASH CONTENT, BS&W, PCB

Report Date: 01/13/00
Lab. No. : 00-0015A

Sample ID: Monthly Oil Sampling - Dec/Jan 2000 1/4/00

Parameter	MDL (ppm)	LOD-S (ppm)	Results (ppm)
PCB's (Method EPA 3580A, 3665, 3620A, 8080)			
Arochlor 1016	1.0	1.0	ND
Arochlor 1221	1.0	1.0	ND
Arochlor 1232	1.0	1.0	ND
Arochlor 1242	1.0	1.0	ND
Arochlor 1248	1.0	1.0	ND
Arochlor 1254	1.0	1.0	ND
Arochlor 1260	1.0	1.0	ND

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Object: TCLP METALS, F-SCAN, FLASHPOINT, TOTAL HALOGENS
BTU, SULFUR CONTENT, ASH CONTENT, BS&W, PCB

Report Date: 01/13/00
Lab. No. : 00-0015A

QA/QC DATA

1. SURROGATE % RECOVERY

VOLATILE COMPOUNDS

	Results(%) 1	Limits(%)
1,2 Dichloroethane-d4-----	105	80 - 120
Toluene-d8----------	100	82 - 118
4-Bromofluorobenzene------	95	80 - 120

2. METHOD BLANKS (ORGANICS):

FILE ID	FRACTION	COMPOUND	RESULT
HPB76092	PCB	All Compounds	ND
HPD11108	F-SCAN	All Compounds	ND

SAMPLE PROCESSING DATA

	METALS	F-SCAN	PCB
Date Extracted/Digested:-	01/08/00	NA	01/05/00
Extracted/Digested by:---	JSI	NA	MS
Date Analyzed:----------	01/08/00	01/13/00	01/06/00
Analyzed by:----------	JSI	LK	AB2
File ID:----------	NA	HPD11127	HPB76097
Batch #:----------	010800	011300	010600

ND = Not Detected or less than MDL
NA = Not Applicable or Not Analyzed
LOD-S = Limit of Detection for the reported sample(s)
MDL = Method Detection Limit or Contract Required Detection Limit.
Trip/Field Blank Submitted: No
Test Parameters Subcontracted: None
Results are reported in ppm unless otherwise specified.
Results are reported on a dryweight basis where appropriate.
Issuing of this report certifies that all cited method control criteria have been met unless otherwise indicated or qualified in the quality control section.

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ACCREDITED

REPORT OF ANALYTICAL SERVICES

TO:
SRS Environmental
3345 Greenfield Road
Melvindale, MI 48122

Report Date: 02/11/00

Lab Number: 00-0321A

Customer P.O. #:

Customer #:

RTI Quote #:

Attn:
Nick Ciantar

PART / SAMPLE IDENTIFICATION:

Monthly Oil Sampling - Jan/Feb 2000
1 Oil Sample

Received: 02/02/00 Tests Completed: 02/10/00 Reported: 02/11/00

WORK REQUESTED / PERFORMED:

TCLP METALS, F-SCAN, FLASHPOINT, TOTAL HALOGENS
BTU, SULFUR CONTENT, ASH CONTENT, BS&W, PCB

THE RESULTS OF ALL TESTS and/or ANALYSES REQUESTED ARE REPORTED ON THE PAGES WHICH FOLLOW.

Number of pages including this page 7

APPROVED BY: _____ REPORTED BY: _____

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RTI LABORATORIES, INC.
Chemical, Metallurgical & Environmental Testing

CONFIDENTIAL REPORT OF EVALUATION

Submitted by : Nick Ciantar

Lab. No. : 00-0321A

Client : SRS Environmental
Melvindale, MI

Report Date : 02/11/00

Sample ID :

Monthly Oil Sampling - Jan/Feb 2000
1 Oil Sample

Object :

TCLP METALS, F-SCAN, FLASHPOINT, TOTAL HALOGENS
BTU, SULFUR CONTENT, ASH CONTENT, BS&W, PCB

Results and Discussion :

SAMPLE IDENTIFICATION	SAMPLE MATRIX
1 - Jan/Feb 2000 2/2/00	Oil

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BTU, SULFUR CONTENT, ASH CONTENT, BS&W, PCB

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Lab. No. : 00-0321A

Sample ID: Monthly Oil Sampling - Jan/Feb 2000 2/2/00

PARAMETERS	METHOD	MDL (ppm)	LOD-S (ppm)	Results (ppm)
F-SCAN (F001-F002)				
Tetrachloroethylene	8260	0.001	1.0	ND
Trichloroethylene	8260	0.001	1.0	ND
Methylene chloride	8260	0.001	1.0	ND
1,1,1-trichloroethane	8260	0.001	1.0	ND
Carbon tetrachloride	8260	0.001	1.0	ND
Chlorinated Fluorocarbons	8260	0.001	1.0	ND
Chlorobenzene	8260	0.001	1.0	ND
1,1,2-trichloro-1,2,2-trifluoroethane	8260	0.001	1.0	ND
1,2-Dichlorobenzene	8260	0.001	1.0	ND
1,3-Dichlorobenzene	8260	0.001	1.0	ND
1,4-Dichlorobenzene	8260	0.001	1.0	ND
Trichlorofluoromethane	8260	0.001	1.0	ND
1,1,2-trichloroethane	8260	0.001	1.0	ND

PARAMETERS	METHOD	MDL (ppm)	LOD-S (ppm)	Results (ppm)
F-SCAN (F003)				
Xylenes	8260	0.003	3.0	7.1
Acetone	8260	0.001	1.0	ND
Ethyl acetate	8260	0.001	1.0	ND
Ethyl benzene	8260	0.001	1.0	1.2
Ethyl ether	8260	0.001	1.0	ND
Methyl isobutyl ketone	8260	0.001	1.0	ND
n-butyl alcohol	8260	0.001	1.0	ND
Cyclohexanone	8270	0.001	1.0	ND
Methanol	8015	0.100	1.0	ND

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BTU, SULFUR CONTENT, ASH CONTENT, BS&W, PCB

Report Date: 02/11/00
Lab. No. : 00-0321A

Sample ID: Monthly Oil Sampling - Jan/Feb 2000 2/2/00

PARAMETERS	METHOD	MDL (ppm)	LOD-S (ppm)	Results (ppm)
F-SCAN (F004)				
o-Cresol	8270	0.001	1.0	ND
m-Cresol	8270	0.001	1.0	ND
p-Cresol	8270	0.001	1.0	ND
Nitrobenzene	8270	0.001	1.0	ND

PARAMETERS	METHOD	MDL (ppm)	LOD-S (ppm)	Results (ppm)
F-SCAN (F005)				
Toluene	8260	0.001	1.0	3.2
Methyl ethyl ketone	8260	0.001	1.0	22
Carbon disulfide	8260	0.001	1.0	ND
Isobutanol	8260	0.001	1.0	ND
Pyridine	8270	0.001	1.0	ND
Benzene	8260	0.001	1.0	ND
2-ethoxyethanol	8260	0.001	1.0	ND
2-nitropropane	8260	0.001	1.0	ND

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BTU, SULFUR CONTENT, ASH CONTENT, BS&W, PCB

Report Date: 02/11/00
Lab. No. : 00-0321A

Sample ID: Monthly Oil Sampling - Jan/Feb 2000 2/2/00

PARAMETER	RESULTS
Ignitability (Flash point, deg. F)	>200
Total Halogens (ppm)	1818
Total Sulfur (percent)	0.38
BS&W (percent)	1.8
Ash Content (percent)	0.13
BTU (BTU/lb)	19400

TCLP METALS PORTION

PARAMETERS	METHOD	MDL (ppm)	LOD-S (ppm)	Results (ppm)	Regulatory Limit (ppm)
METALS	3020A (Sample Preparation)				
Arsenic	6010	0.20	1.00	ND	5
Barium	6010	0.01	0.25	1.35	100
Cadmium	6010	0.01	0.25	ND	1
Chromium	6010	0.02	0.50	0.95	5
Lead	6010	0.05	1.25	ND	5
Mercury	7470A	0.01	0.01	ND	0.2
Selenium	6010	0.20	1.00	ND	1
Silver	6010	0.01	0.50	ND	5

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Parameter	MDL (ppm)	LOD-S (ppm)	Results (ppm)
PCB's (Method EPA 3580A, 3665, 3620A, 8080)			
Arochlor 1016	1.0	1.0	ND
Arochlor 1221	1.0	1.0	ND
Arochlor 1232	1.0	1.0	ND
Arochlor 1242	1.0	1.0	ND
Arochlor 1248	1.0	1.0	ND
Arochlor 1254	1.0	1.0	ND
Arochlor 1260	1.0	1.0	ND

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BTU, SULFUR CONTENT, ASH CONTENT, BS&W, PCB

Report Date: 02/11/00
Lab. No. : 00-0321A

QA/QC DATA

1. SURROGATE % RECOVERY

VOLATILE COMPOUNDS

	Results(%) 1	Limits(%)
1,2 Dichloroethane-d4-----	114	80 - 120
Toluene-d8----------	103	82 - 118
4-Bromofluorobenzene------	103	80 - 120

2. METHOD BLANKS (ORGANICS):

FILE ID	FRACTION	COMPOUND	RESULT
HPB76510	PCB	All Compounds	ND
HPD12008	F-SCAN	All Compounds	ND

SAMPLE PROCESSING DATA

	METALS	F-SCAN	PCB
Date Extracted/Digested:-	02/05/00	NA	02/04/00
Extracted/Digested by:---	JSI	NA	MS
Date Analyzed:----------	02/05/00	02/08/00	02/07/00
Analyzed by:----------	JSI	LK	AB2
File ID:----------	NA	HPD12016	HPB76513
Batch #:----------	020500	020800	020700

ND = Not Detected or less than MDL
NA = Not Applicable or Not Analyzed
LOD-S = Limit of Detection for the reported sample(s)
MDL = Method Detection Limit or Contract Required Detection Limit.
Trip/Field Blank Submitted: No
Test Parameters Subcontracted: None
Results are reported in ppm unless otherwise specified.
Results are reported on a dryweight basis where appropriate.
Issuing of this report certifies that all cited method control criteria have been met unless otherwise indicated or qualified in the quality control section.

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Paragon
Laboratories, Inc.

12649 Richfield Court
Livonia, Michigan 48150

(734) 462-3900 • Fax (734) 462-3911

Fax

Date: 4/17/00

To: Sherryll Miller **Fax:** (313) 382-9764

Company: SRS

From: **Eric Turner**
Phone: **734-462-3900**
Fax: **734-462-3911**

Pages: 3

Subject: Other Two Metals

Comments:

Paragon
Laboratories, Inc.

LABORATORY TESTS RESULTS
04/13/000

JOB NUMBER: 122132 CUSTOMER: SRS Environmental ATTN: Sherryll Miller

CLIENT I.D.....: Monthly Oil-April 2000
DATE SAMPLED.....: 04/03/00014:30
TIME SAMPLED.....: 14:30
WORK DESCRIPTION...: Monthly Oil-Plant-April 2000

LABORATORY I.D...: 122132-0001
DATE RECEIVED....: 04/05/00009:52
TIME RECEIVED....: 09:52
REMARKS.....:

TEST DESCRIPTION	FINAL RESULT	LIMITS/*DILUTION	UNITS OF MEASURE	TEST METHOD	DATE	TECHN
PCBs in Liquid		*10		SW 846 8082	04/12/00	BND
PCB Aroclor 1016	ND	10	mg/kg			
PCB Aroclor 1221	ND	10	mg/kg			
PCB Aroclor 1232	ND	10	mg/kg			
PCB Aroclor 1242	ND	10	mg/kg			
PCB Aroclor 1248	ND	10	mg/kg			
PCB Aroclor 1260	ND	10	mg/kg			
F001-F005 Volatiles		*10		SW 846 8260B	04/11/00	BND
Acetone	ND	500	mg/kg			
Benzene	ND	10	mg/kg			
Carbon disulfide	ND	50	mg/kg			
Carbon tetrachloride	ND	10	mg/kg			
Chlorobenzene	ND	10	mg/kg			
1,2-Dichlorobenzene	ND	10	mg/kg			
Ethyl acetate	ND	500	mg/kg			
Ethyl ether	ND	500	mg/kg			
Ethylbenzene	ND	10	mg/kg			
Methyl ethyl ketone	ND	500	mg/kg			
Methyl isobutyl ketone	ND	500	mg/kg			
Tetrachloroethene	ND	10	mg/kg			
Toluene	ND	10	mg/kg			
1,1,1-Trichloroethane	ND	10	mg/kg			
1,1,2-Trichloroethane	ND	10	mg/kg			
Trichloroethene	ND	10	mg/kg			
Trichlorofluoromethane	ND	20	mg/kg			
Xylenes, total	14.1	10	mg/kg			
Trichloro-trifluoroethane	ND	10	mg/kg			
Dichloromethane	ND	50	mg/kg			
F001-F005 Semi-Volatiles		*1		8270C	04/10/00	BND
2-Methylphenol	ND	50	mg/kg			
3&4 Methylphenol	ND	100	mg/kg			
Cyclohexanone	ND	50	mg/kg			
Nitrobenzene	ND	50	mg/kg			
Pyridine	ND	50	mg/kg			
2-Ethoxyethanol	ND	500	mg/kg			
2-Nitropropane	ND	500	mg/kg			
TCLP RCRA Metals		*1		6000-7000 Series	04/11/00	AKL
Barium (TCLP)	non detect	0.1	mg/L	6010B		

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Laboratories, Inc.

LABORATORY TESTS RESULTS
04/13/000

JOB NUMBER: 122132 CUSTOMER: SRS Environmental ATTN: Sherryll Miller

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DATE SAMPLED.....: 04/03/00014:30
TIME SAMPLED.....: 14:30
WORK DESCRIPTION...: Monthly Oil-Plant-April 2000

LABORATORY I.D...: 122132-0001
DATE RECEIVED....: 04/05/00009:52
TIME RECEIVED....: 09:52
REMARKS.....:

TEST DESCRIPTION	FINAL RESULT	LIMITS/*DILUTION	UNITS OF MEASURE	TEST METHOD	DATE	TECHN
Cadmium (TCLP)	non detect	0.1	mg/L	6010B		
Chromium (TCLP)	non detect	0.5	mg/L	6010B		
Lead (TCLP)	non detect	0.5	mg/L	6010B		
Mercury (TCLP)	non detect	0.05	mg/L	7470A		
Silver (TCLP)	non detect	0.5	mg/L	6010B		
Arsenic (TCLP)	non detect	0.1	mg/L	6010B		
Selenium (TCLP)	non detect	0.5	mg/L	6010B		
Copper (TCLP)	non detect	0.01	mg/L	6010B		
Zinc (TCLP)	0.018	0.01	mg/L	6010B		
Ignitability, (Flash Point)	>200	1	Deg F	EPA 1010	04/07/00	ACW
Total Halogens	1300	100	mg/kg	9077	04/07/00	DTM
Ash Content	0.031	0.001	wt. %	ASTM D482	04/12/00	DHN
B. S. and Water, by centrifuge	0.1	0	vol. %	ASTM D1796	04/07/00	DHN
X-Ray Sulfur in Fuel Oils	0.391	0.005	wt %	ASTM D4294	04/10/00	DHN

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July 3, 2000
MIR 000 022 400
Review of Document Titled, "SRS Environmental QA/QC Program"
(Received on March 28, 2000)
Prepared by Sue Rodenbeck Brauer, Region 5 RCRA Used Oil Expert

Comparison of SRS Environmental QA/QC Program with 40 CFR 279.55, Analysis Plan

Analytical requirements of 40 CFR 279.53 and 40 CFR 279.72.

(a) Rebuttable presumption for used oil in 40 CFR 279.53.
(1) Whether samples analyses or knowledge will be used:
•generator waste characterization report for knowledge (p. 5-1);
•approval process annually (p. 5-2) does not include total halogens and sets maximum for PCBs as 50 ppm (should be less than 2 ppm to avoid TSCA regulation);
•Figure 5.C does not list total halogens as a required analysis for approval;
•Figure 5.D does not specify total halogens or any other analyte;
•Figure 5.G lists % chlorine (without an identified analytical method) as an analysis performed on each in-bound shipment.
•Figure 5.H does not specify whether quantitative results are recorded (it's a blank form).

(2) (i) sampling method: Figure 5.E gives sample method as "SW-846" and sample equipment as "coliwasa/tube sampler, weighted bottle, bomb, or tank sampling ports."
(ii) frequency of sampling: Figure 5.G lists % chlorine as an analysis performed on each in-bound shipment.
(iii) methods used to analyze used oil for parameters specified in 40 CFR 279.53 (halogenated hazardous constituents listed in App. VIII of Part 261):
•From Figure 5.C (pre-approval) for waste oils, TCLP Semivolatiles 3510 & 8270, TCLP Volatiles Method 8240, PCBs 8080;
•From Figure 5.C (pre-approval) for process & ground waters, PCBs 8080, TCLP Semivolatiles 3510 & 8270, TCLP Volatiles 8240, Herbicides 8150, Pesticides 3510 & 8080; and,
•From Figure 5.C (pre-approval) for sludges, PCBs 8080, TCLP Semivolatiles 3510 & 8270; TCLP Volatiles 8240.
[Does this cover all the halogenated hazardous constituents in App. VIII to Part 261? NO, pages 5-3 and 5-4 list "semi-volatiles/volatiles-defined under 40 CFR Section 261.21, the characteristic of ignitability, but the organic constituents for the characteristic of toxicity from 40 CFR 261.24 are listed with the exceptions of benzene, hexachlorobutadiene, and hexachloroethane. It's not a complete list of halogenated constituents from App. VIII of Part 261.]

(3) The type of information that will be used to determine the halogen content of the used oil. It may be inferred that waste profile forms completed by generators and % chlorine by analysis will be used, but the "rebuttable presumption" is not addressed per se in the QA/QC Program.

(b) On-specification used oil fuel in 40 CFR 279.72
A processor/re-refiner may determine that used oil that is to be burned for energy recovery meets the fuel specifications of 40 CFR 279.11 by performing analyses or obtaining copies of analyses or other information documenting that the used oil fuel meets the specifications.
The plan must specify the following if 40 CFR 279.72 is applicable (section 5.6.2 on page 5-21 suggests that SRS Environmental ships on-specification used oil fuel)

(1) whether sample analyses or other information will be used to make this determination (section 5.6.3 suggests that analyses are relied upon to make the determination)

(2) If sample analyses are used to make this determination, then
(i) The sampling method used to obtain representative samples to be analyzed: **Not provided in section 5.6.2 and 5.6.6.**
(ii) whether used oil will be sampled and analyzed after any processing/re-refining. Section 5.6.3 states that on-spec oil will be analyzed for BS&W, Corrosivity, Sulfur Test, Ignitability, toxicity characteristics metals, total halogens (TX), and PCBs.) As summarized in section 5.6.2, RCRA regulations require analysis for As, Cd, Cr, Pb, flash point, and TX. Figure 5.N does not include any metals. Why are there three different representations (5.6.3, 5.6.2, and 5.N) of what metals are analyzed?
(iii) The frequency of sampling to be performed, and whether analyses will be conducted on- or off-site. In Section 5.6.2 on page 5-22, it is not clear who (on- or off-site) performs monthly analyses on each holding tank. In Section 5.6.4 on page 5-22, it is not clear whether the independent laboratory analyses are conducted on- or off-site.
(iv) the methods used to conduct the analyses. Section 5.6.3 and Figure 5.N are not consistent with respect to flash point determination (ignitability by method 1010 and method 1010 or 1020, respectively).

(3) The information to be used to make the on-spec used oil fuel determination. SRS apparently relies exclusively on analyses.

F:\user\sbrauer\usedoil\sybill\Used Oil Analysis Plan regulatory review.wpd, 7/3/2000srb

3-28-00

9 ¼ PSI - Drop water water drop
10 ¼
11 Cooling good oil move to 15+17
12 ↓½ oil treated at 800 gpm ACID 170° good oil move to 15+17
13 —
14 filling + heating (need to treat with w/c.) treated w/c water drop 180°
15 Good oil (need to blend)
16 11 or 12
17 Good oil
18 floor
19 —
20 Bottom ↑ 3/4
MT 21 ~~A-water~~ ↓ ¼ oil
22 ↑ ½ bottoms
23 ↓ ½ 11 or 12 ↑ 3/4
24 Some A-water into ↓
25 MT
26 11 or 12
27 MT
28 3/4 bottoms
29 T-3
30 T-3

* NEED to start cleaning all Tanks From Top To Bottom Every Tank in Plant (39)

3-28-00 AFT.

9 Moven to 11 ↓1/4 almost MT
10 1/4
11 Filling + heat ✓ level
12 MT
13 —
14 treated with Acid 200am 180°
15 good oil Full mixed
16 11 or 12
17 good oil ↑1/2
18 Floor
19 —
20 ↑3/4 Bottoms
21 MT
22 11 or 12
23 MT
24 ↑1/4 oil
25 MT
26 11 or 12
27 MT
28 3/4 Bottoms
29 T-3
30 T-3

Notes:

* NEED ACCESS TO PARTS TO FIX HOSES.
* 9003 9004 9005 ready For LTV
* ✓3 befor you use it
* ↓1/2 A water ↑1/2 good oil
* SL Trench will be in

3-29-00 mid

9 mt
10 Nelson
11 full Heating?
12 filling
13 —
14 ~~[illegible]~~ mt
15 good oil mix full
16 11 or 12
17 good oil ↑ 1/2
18 floor
19 —
20 ↑ 3/4 Bottoms
21 mt
22 ~~[illegible]~~ 12 Mt
23 mt
24 ↑ 1/4 oil 11 or 12
25 mt Full ~ Good oil
26 ~~[illegible]~~ ~~[illegible]~~ MT
27 mt
28 ↓ 3/4 Bottoms
29 T3 ↓ 3/4
30 T3 ↓ 3/4

x Hoses.

2 ypsi ~~1 Buick~~ 1 warren LTV 6000 6000
~~3500 Hot Strip~~ 6000 Parma Nelsons 10,000 10,000
2 Rouge 10,000 35,00 Rouge

20 26 28 29 30 24
all the line to the tank are done

Spiked on top of #12 ~~[illegible]~~ pluged

6

3-29-00

9 Full - Ready for Acid + heating
~~10 1/4 water filling NELSON~~ DOWN TO OIL
11 full - Ready for Acid } Cooling treated at 1:15 pm ACID
12 full - Ready for Acid Temp 185°
13 —
14 ↓1/2 (A-treat) filling from 29 / FULL 180°
15 Good oil
16 11 or 12 ↓1/2
17 1/2 Good oil
18 floor
19 —
20 ↑3/4 Bottoms
21 YPSI - treated Water drop 170° w/Caustic 11 AM
22 MT YPSI treated water drop 180° C/T 1:00 p
23 MT LTV Full
24 T-3 full
25 Full Good oil
26 ~~1/4 Good oil~~ Buick
27 ~~YPSI~~ WARREN treated Water drop 1 AM Caustic
28 ↓3/4 Bottoms + T-3 full
29 ~~↓3/4~~ T-3 full / Bottoms ↓
30 ~~↓3/4 T-3~~ MT DO NOT use
(Down for Repairs)

* DO NOT USE Tank 30 it is Leaking
use 9+14+11+12 for ACID Treats
use 20-30 for Caustic Treats

59

*use 26 for Buick (not finished unloading)
*MOVE T-29 to 14
*use T-22 for YPSI Treat with Caustic
*T-29 is moving to 14
* T-9005 is Full of Good oil it Has to much Trash in it need to unload and Reload with Screen for Tomorrow

3-29-00 AFT

9 treated at 1045pm w/ACID 175°
10 Rouge
11
12 treated at 100am w/ACID 180°
13 —
14 treated at 1130pm w/Caustic 175°
15 MT
16 11012
17 MT
18 Floor
19 —
20 ↑3/4 Bottoms
21 MT
22 MT
23 Full LTV Moventoll 23 Mt
24 T-3 Full
25 Full good oil
26 Buick
27 MT
28 T-3 Full
29 T-3 Full
30 MT

Notes

* 9003 9004 9005 ready For LTV
* 3 is Full
* 9002 MT need to be loaded with good oil

1:15pm
80°
Austic 11
5° C/T 1:00p
1AM Caustic
eaking
ts
ding)
Caustic
s to
and Reload

3-30-00 mid

9 treated at 1045pm ✓ w/caustic 180°
10 Rouge
11 treated at 7:45 AM ✓ w/ACID 175°
12 treated at 1:00 AM ✓ w/ACID 180°
13 —
14 treated at 11:30pm ✓ w/caustic 180°
15 mt
16 Ilar 12
17 mt
18 floor
19 —
20 ↑ ¾ Bottoms
21 ~~mt~~ 1xYPSP
22 ~~mt~~ filling YPSP
23 mt
24 T-3 full
25 ↓ ¾ good oil
26 Buick
27 mt
28 T3 full
29 T3 full
30 mt

Notes
9002 loaded ~~[illegible]~~ readed
for LTV
3is full

3-30-00 DAY

tic 180°

ED 175°
ED 180°

tic 180°

9 Cooling
10 Rouge
11 Cooling Bottoms moved to 27 good oil
12 MT treated at 1130 pm w/ACID 180°
13 —
14 Cooling water drop moved to 20
15 full Good oil
16 full bottom from 12
17 ↓1/2 bottom
18 floor
19 —
20 ↑3/4 bottoms
21 YPSI - treated water drop 8am 170°
22 YPSI - treated water drop 10am 160°
23 YPSI - treated water drop 12pm 180°
24 T-3 full
25 full Good oil
26 Buick full
27 A-water Water drop
28 T-3 full
29 T-3 full
30 MT (Down for repairs)

aded

Bill + Lawyer will be in first thing in the morning so have plant clean by 7AM → Pass note on (Keep up the house cleaning)

3-30-2000 AFT

9 Cooling
10 Down to oil
11 Filling ✓level
12 treated at 1130pm w/ACID 180°
13 —
14 MT
15 LTV move to 11 MT
16 Full Bottoms
17 ↓1/2 Bottoms
18 Floor
19 —
20 ↑1/4 A water
21 MT
22 ~~move to 11~~ MT
* 23 ↑1/4 11 or 12
24 T-3 Full (everclear)
* 25 ↑3/4 good oil
* 26 Back 11 or 12
27 ↑3/4 Bottoms ~~(everclear)~~
28 T-3 Full (everclear)
29 T-3 Full (everclear)
30 MT

Notes
* 9000 9006 ready for everclear
* 9003 9004 9005 ready for LTV
9002 need to be unloaded
* 3 is Full

* Bill + lawyer will be in at 700am so have plant looking good

midnight

9 Cooling
10 ~~[illegible]~~ Nelson
11 Heating
12 Cooling
13 —
14 MT
15 MT
16 Full Bottoms
17 1/2 Bottoms
18 Floor
19 —
20 a-water 1/4
21 ~~[illegible]~~ 1x YPSP
22 ~~MT~~ WARREN
23 move to 12
24 T-3 everclear
25 3/4 Good oil
26 ~~[illegible]~~ moven to 14
27 3/4 Bottoms
28 Full T-3 everclear
29 Full T-3 everclear
30 —

I need Samples of 27, 16, 17, Bottom, middle, Top. 30

9000 – Sludge for Monday T-3 oil
9001 – MT
9002 – NEED TO MT
9003 – 6 250 good oil
9004 – 6 250 good oil
9005 – 6 250 good oil
9006 – Sludge for Monday T-3 oil

Start wrighting the Temp of The Tank you Treat

3-31-00

9 Top off and treat w Acid + heating 180°
10 Nelson Down to oil
11 Ready for Acid treated at 100am 170
12 Cooling Filling
13 —
14 Ready for Acid + heating treated 1045 170 w/ACID
15 Warren
16 Full bottoms
17 ~~1/2 bottoms~~ MT
18 floor
19 —
20 1/4 A-water
21 VPSI treated w/c MT 170° 10:30
22 Warren treated w/c MT 180° 11:40
23 11 or 12
24 T-3
25 3/4 Good oil MT
26 Buick
27 3/4 bottoms
28 T-3
29 T-3
30 —

+ meeting mon 8am in LeB

3-31-00 AFT

√9 need to be treated with ACID
10 Down to oil
11 treated 100am temp 170 w/ACID
12 Filling
13 — —
14 √1/4 good oil
15 Warren
16 Full bottoms
17 MT
18 Floor
19 —
20 1/4 Awater
21 ~~MT~~ 1xYPSP
22 MT VPSI
23 MT
24 T-3
25 MT
26 Buick √1/2
27 3/4 bottoms
28 T-3
29 T-3
30 —

Notes
* 9003 9004 9005 Ready For LTV
* 9007 need to be unloaded move to 12
* √3 before you use it
* 9000 MT
* 9006 MT

ing 180°
am 170
45
ated 170 w/ACID
10:30
11:40

4/-1-00 DAY

9 Ready for Acid
10 Down to oil
11 Cooling treated At 3pm w/ACID 180°
12 Down to Good oil
13 —
14 ↓ 1/4 Good oil
15 WATTEN
16 full bottoms
17 MT
18 floor
19 —
20 1/4 A-water
21 YPSI treated WK 175° 9am
22 YPSI treated W/C 180° 10 AM
23 MT
24 MT
25 Romulus
26 Buick + LTV
27 3/4 bottoms
28 Rouge
~~29 MT~~ Rouge
30 —

Notes:

✓ 3 before use
Rouge may be running later

4-1-00 AFT.

9 Ready For Acid treating 10pm 180° w/ACID
10 Down to oil
11 Filling heat V level
12 good oil
13 —
14 MT
15 Warren
16 Full bottoms
17 MT
18 Floor
19 —
20 Full A water
21 ~~YPSI Water drop move to 11~~ MT
22 YPSI move water to 23 move oil
23 C-Water
24 MT
25 Romulus
26 MT
27 3/4 Bottoms
28 Rouse
29 Rouse
30 —

Notes
* 9002 MT
* 9004 9005 9003 ready for LTU
* V3 before you use it

* case move 21 to 11
* move 22 water to 23 oil to 11

AM

MID 4/2/00

9 READY for ACID TREAT MOVE TO 11
M. OIL 10 DOWN TO OIL (HEATING)
~~Cooling~~ 11 ~~Filling NEED TO TOP OFF~~ / FULL READY TO TREAT
12 [redacted] Filling YPSI — MOVE TO 9
13 —
14 [redacted] YPSI X 2 FULL - treated 175° 3am
15 WARREN
16 ~~Full Bottoms~~ LTV FULL
17 [redacted] Good oil check LEVEL
18 Floor
19 —
20 Full A-WATER ✓
21 [redacted] Filling from TANK-3 · Full
22 oil Ready 11+12
23 C-WATER ✓
24 [redacted] Filling from T-3 FULL
25 Romulus
26 ~~MT~~ T-3
~~27 3/4 Bottoms~~ LTV
28 ROUGE ✓
29 ROUGE ✓
30 —

* MOVE 9 to

* NOTES
9000 9002 9006 ARE EMPTY
TANK 1 HAS 10 FEET of AIR
CHECK 3 BEFORE USING

9003, 9004, 9005) Good oil

9000 - Sludge or Bottoms
9006 - Sludge or Bottoms

1. Fill 21 + 24 from 3 oil and 1 more
2. move water out to 3 after 23, 28, 29
3. Treat 9

Darry + Mike Call me 304-6854 Stan

= TO 11
TING
DY TO TREAT
MOVE TO 9
° 3am

9 need to treat with acid
10 floor
11 filling
12 Heating Caustic treat 10:00 Treated 180°
13 ——
14 need to drop water
15 warren
16 LTV FULL move to 14
17 MT
18 floor
19 —
20 full a water
21 full T3
22 water + oil
23 C-water
24 full T3
25 Romulus
26 full T3
27 ~~LTV x2 FULL mover to #11~~ MT ~~[illegible]~~ XPSI
28 ~~Rouge next move to #10~~ MT 1x YPSI
29 Rouge
30 ——

NOTES: #9000 READY (6250 SLUDGE)
#9005 DONE & GONE
#9003 HAS 18.5" #9004 is EMPTY
#5000 IS FULL
TANK 3 is FULL DISCHARGE LINE ON #5 LEAKING

003
004) Goodoil
005

Drop water 14 T-3
Drop water 12 T-3
put Last YPSI in 28+29
move 16 to 12
Drop 23 water T-3

1 more
,28,29
NF

MTD + Days

9 need to Treat
10 Water
11 Treated at 11:20am + ACID 175°
12 Water Dropping treated at 800pm 178°
13 ——
14 Need to Drop C-Water Top off ACID Treat
15 Warren
1/2 16 Full LTV move to 12
17 MT
18 Floor
19 ——
20 Full C-Water good oil ✓ For Bottoms
MT 21 1/4 T-3
22 Drop water move oil 11+12
23 1/4 good oil ✓ for Bottoms Bottom drop
24 Full T-3
25 Romulus
MT 26 T-3 Full oil
27 YPSI
28 Warren
MT 29 Rouge move to T-3
30 Down for Repairs

Heating treated W/C 1pm 180° need to Treat Caustic treated W/C

(59)

9000 = Sludge
9001 =
9002 = Sludge
9003 = Good oil Has 18" on now
9004 = Good oil
9005 = Good oil

Keep ✓ing on T-1 Level 10' air
4-3-00

4-3-00 AFT

9 treated at 1230 am 170° w/ACID
10 Down to oil move to 11 or 12
11 MT
12 MT
13 —
14 treated at 130 am 170° w/Caustic
15 Washed
16 ↓ 1/2 LTV move to 11 or 12
17 MT
18 Floor
19 —
20 good oil ✓ For bottom ↑ 1/4
21 MT
22 Drop water move oil 11 + 12
23 good oil bottoms drop
24 T-3 Full ↑ 1/4 water
25 Romulus
26 MT
27 ↓ 1/2 YPST water drop 11 or 12 > move to 11 or 12
28 Washed ↓ 1/2 water drop 11 or 12
29 MT
30 Down For Repairs

Notes
* 9000 9002 Ready For Every
* 9003 9004 9005 Ready For LTV
* Scale need to be pump down
* ✓3 be For you use it

* 27 + 28 moved to 12

4-4-00 mid

9 Cooling
10 mt
11 mt filling 1XYPS9
12 filling treated at 11:45 AM 175° w/ACID
13 —
14 Cooling
15 warren
16 ½ LTV moven to 12
17 mt
18 floor
19 —
20 good oil 1/4 full
21 mt
22 ~~good oil~~ mt
23 good oil
24 T3 full
25 Romulus and scale
26 mt
27 mt
28 ~~mt~~ T-3
29 mt filling T3
30 Down for Repairs

Notes:
9003 + 5 + 6 Good oil
9004 Down for repair (if loaded then unload)
9000 + 9002 sludge
use front middle pump for floor
9406 - Buick

4-4-00 DAY

175° w/ACID

9 Cooling - Dropped ~~[illegible]~~ water A-TREATED w/ACID good oil 180° ↓1/4
10 Rouge Down to oil
11 ↓1/2 YPSI
12 ~~Cooling A-treated~~ Dropping WATER good oil/ATR
13 —
14 filling YPSI treated W/C ↓1/2 170° 11:30am
15 MT
16 ↓1/2 LTV
17 MT
18 floor
19 —
20 full Good oil
21 YPSI
22 MT
23 Good oil ✓ level
24 full T-3
25 Romulus + Scale
26 floor into
27 MT
28 full T-3
29 full T-3
30 Not in use

Notes:
SEE pg. 20

...d then unload)

...or

4-4-00 AFT

9 ↓1/4 good oil
10 Down to oil
11 treated at 320am 175° w/ACID
12 Filling ✓level + heat
13 —
14 ↓1/2 ready for Acid move to 12
15 MT
16 ↓1/2 LTV
17 MT
18 Floor
19 —
20 Full good oil
21 4PST
22 MT
23 good oil ✓level ↓1/4
24 Full T-3 ↑1/4 water
25 Romulus
26 Floor into
27 MT
28 MT
29 T-3 Full
30 Down for repair
Notes

* 9003 9005 9006 ready for LTV
* 9002 9000 ready for every clear

* Buick move to 12

* ✓3 to make sure you have room

4-5-00

9 2xYPSP full + Heating
10 Down to oil
11 ~~Cooling~~ droping water to 3
12 filling Buick full treated w/ 9.45 180°
13 —
14 ~~[illegible]~~ ½ of YPSP
15 mt
16 ½ LTV filling Buick full
17 ~~mt~~ Buick full
18 floor
19 —
20 full good oil
21 ~~[illegible]~~ mt
22 mt
23 good oil ✓ level
24 Full T-3
25 Romulus
26 ~~floor into~~ ~~mt~~ floor
27 ~~mt~~ 3500 Rouge
28 mt
29 T3
30 Down to fix open
Notes
5 feet in #3

Stop using 3" air Pumps to to move ACID use the ACID Pump it will push it to 9 or 14. The Pump are almost Shot! * (SA)

9000
9002 } Sludge
9003
9005 } Good oil

4-5-00 DAY

9 YPSI - water dropped
10 Down to oil
11 ↓1/4 refill & treat Filling
12 Cooling - water moving to 3 good oil
13 —
14 YPSI ~~moving to 3~~ water - Done
15 MT
16 full 11 or 12
17 full 11 or 12
18 floor
19 —
20 full Good oil
21 MT
22 MT
23 Good oil ↓1/4
24 T-3 - 1/4 water
25 Romulus
26 floor
27 YPSI + 3500 Rouge
28 ↓1/4 T-3 MT
29 full T-3 Drop water
30 Open * Do not use

9000
9002 > SLUDGE

9003
9005 > 6250 Good oil
9006

4-5-00 AFT.

9 MT
10 Down to oil
11 treated at 10pm AND 170° water drop good oil ✓ for bottoms
12 treate at 11 15 175° A water moven to 3
13 —
14 ~~MT~~ 1X YPSI
15 MT
16 Full 11 or 12
17 Full 11 or 12
18 Floor
19 —
20 ↓1/4 good oil
21 MT
22 MT
23 good oil ↓ 1/4
24 T-3 - 1/4 water
25 Romulus
26 Floor
27 YPSI + Rouge moven to 14 MT
28 MT
29 ↓1/4 T-3
30 open * Do not use

Notes

* 9003 9005 9006 Ready For LTV
* 9002 9000 Ready For every clear
* Buick in back pad loaded called at 10pm SAM
So I could unloaded it Dennise took keys
T.5 FULL / SKIMMED / #5000 FULL
T.3 3½ FEET OF AIR

Carlo

* 11 good oil ✓ For bottoms
* 12 A Water Moven to 3
* ✓ 3 For room

3-4-6-00 Mid

9 ~~mt~~ 1 x YPSP
10 Down to oil
11 down to Bottom good oil Next
12 mover to 20
13 —
14 2-YPSP Treated w/C Cooling 180° 2am
15 mt
16 ~~full~~ 11 or 12
17 full 11 or 12
18 floor
19 —
20 good oil
21 ~~mt~~ good oil
22 mt
23 good oil
24 T3-1M water
25 ~~Romotus~~ MT
26 floor
27 Brick
28 mt
29 ~~M~~ T3 full
30 Down to Be fix

Car Bin tank down and
Scrubber tank down until
4:00 PM do not Heat 11 and 12
Call Stan for it (see Jim)

id

~~35~~ 4-6-00

9 Cooling
10 Down to oil Need to MT + Clean out Box
11 filling) ✓ /EVEI
12 filling
13 —
14 Cooling
15 MT
16 Full) 11+12
17 Full
18 Floor
19 —
20 Full good oil MT
21 ↑ 1/2 good oil
22 MT
23 YPSI into
24 T-3 Drop water then send to everclear
25 MT
26 Need to MT for Repairs Tomarrow
27 Buick
28 ↓ 1/4 MT
29 T-3 Full
30 Down

180° 2am

1) all ACID + Caustic water will Be moved to the middle Tanks, ajust the P.H. to a 6ph. then water can Be moved to 3 after P.H. Changed must Be Done

2) afternoons must start Being Cleaner out side, on unloading Area

3) Start wiping Down Tanks + Door (every shift)

4) 9003 Trailer is the Last Traile Load to go into T-1 after MT. we will need

and
wn until
t 11 and 12
Jim)

4600AFT

9 ↓1/2 llor12
10 need to MT + clean out box
11 treated at 130am 170° w/ACID
12 ~~treated at 100am 180° w/ACID~~
13 —
14 ↓1/2 llor12
15 MT
16 MT
17 Full llor12
18 Floor
19 —
20 MT
21 good oil ↓1/4
22 MT
23 4PSI
24 T-3 Drop Water For clearyclear
25 MT
26 Need to MT For repairs tomorrow
27 Buick
28 MT
29
30 Down For repairs

NOTES: NEED MORE BUCKETS
WATER IN T.3 TOO DIRTY TO MOVE
T.5 EMPTY

9004 9000 Ready For clearyclear
9003 9005 9006 Ready For LTV
Acid hoc got a hoc in it that why it not hook to pump

9 ~~½ Hand 12~~ ACPD treat
10 Down to oil
11 ~~treated at 180~~ w/ACID need to top off treated 180° 11:45 AM
12 ~~moved [illegible] 20~~ w/ACID need to top off treat 11:45 AM 175°
13 —
14 ~~½ Hand 12~~ ACPD treat
15 mt
16 mt
17 full 11 or 12
18 floor
19 —
20 A-water ~~Caustic~~ treated
21 good oil ↑¼
22 ~~mt~~ YPSI - treated
23 YPSP - treated
24 T3 Drop water for Ever Cleary water Drop Down to oil
25 mt
26 MT
27 Buick
28 mt
29 T-3
30 Down for Repair

1 MT 27
2 MT 26
3 Drop water on 24 + 11 + 12
Treat 20 with Caustic to a P.h. of 6

box
w/ACID
/ACID ~~Moven~~ +

y clear
es tomorrow

STS
ARTY TO MOVE

ar
For LTV
that why it

4-7-00

9 Ready for Acid (heating) treated 6 45 pm 178°
10 Down to ~~[illegible]~~ oil
11 Cooling treat 180° w/ACID 1pm
12 Cooling Waterdrop good oil
13 —
14 Ready for Acid (heating) w/caustic treated 720 165°
15 MT
16 MT
17 ~~MT~~ GM Engine
18 floor
19 —
20 A-water treated ↓1/4 oil
21 ↑1/4 good oil
22 YPSI - treated w/c Water drop moven to 12 170°
23 YPSI - treated w/c Water drop moven to 12 170°
24 T-3 (water dropped)
25 ~~MT~~ WARTEN
26 MT
27 Buick
28 MT
29 T-3
30 Down for repair

4-7-00 AFT,

9 MT
10 Down to oil
11 cooling
12 Filling ✓ level treated at 330 am 175° w/ACID
13 —
14 MT ~~Buick moved into ↓ 1/4~~
15 Full 11 or 12
16 Full 11 or 12
17 Full or 12
18 Floor
19 —
20 ~~↓ 1/4 oil~~ MT
21 Full good oil
22 ~~MT~~ YPSP Heating
23 ~~MT~~ A-water
24 T-3
25 ~~Warren~~ Good oil Heating
26 ~~MT~~ 11 or 12
27 ~~Buick~~ MT
28 ~~[illegible]~~ 1/4 good oil
29 T-3
30 Down for repair
Notes

* 9003 9005 ready for LTV
* 9006 need to be unloaded and load with good oil
* ✓3 before you use it
* 9006 moven it to 14

5 pm 176°
165°
178°
170°

4-8-00

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30

4-8-60 DAY

9 YPSI - treated w/caustic 9am 180°
10 Rouge - full
11 Cooling - moving A water to 20
12 Cooling treated at 4:15pm Temp 180° w/ACID
13 —
14 MT
15
16 } full 11 or 12
17
18 floor
19 —
20 A-water (treated)
21 Good oil
22 YPSI - treated
23 A-water (treated)
24 T-3
25 Good oil
26 11 or 12
27 MT
28 1/4 oil
29 T-3
30 Open (for Repair)

(59)

Ernest CALL ME STAN when you get in about moving 3 to 5 water only 304-6854
* Andy will be in LATER did not come in Tyrone

(1) all Tanks that are treated must Have Time and temp Sample

Tank 11 Treated 1:00p 180°

4-8-00 AFT.

9 MT
10 Down to oil
11 treated at 130am 180° w/ACID
12 Filling ✓level + heat
13 —
14 MT
15
16 Full 11 or 12
17
18 Floor
19 —
20 A Water treated
21 good oil Full
22 4PSI treated w/caustic 8pm 180°
23 A Water treated
24 T-3
25 good oil full
26 11 or 12 moven to 12 MT
27 MT
28 ✓4/9 oil 11 or 12 move to 12 MT
29 T-3
30 Open down for repairs

Notes
* 9000 loaded 6000 To everyclear
* 9003 9005 ready for LTU
* 9004 MT
* 9006 need to be unloaded and bad with good oil

Mike
* Fill 12 up
* move 20 + 23 water to 3
* only water to 3 ✓ For oil

4/9/00 MID

9 MT
10 DOWN TO oil
11 Cooling WAS TREATED AT 1:30AM 180° w/ACID
12 Full Treated at 3:00 180° w/ACID
13 —
14 MT 17 filling so you can acid treat
15
16 Full 11 or 12
17
18 Floor
19 —
20 LTV CHECK LEVEL
21 Good oil
22 YPSI TREATED 180° w/caustic 11pm
23 MT
24 T-3
25 Good oil Full
26 ~~MT~~ good oil from #11 filling
27 MT
28 MT
29 T-3
30 Down for repairs

* NOTES
Will NOT BE IN ~~Tomorrow~~ MONDAY going TO DENTIST!
MIKE G.
* PAD NEEDS TO BE SPRAYED DOWN
* 9006 LOADED 6,250 good oil
* Daryl CALL STAN ASAP upon ARRIVAL 304#

4-9-00 Daya

9 mt
10 Down to Oil
11 ~~Droping water to 23~~ MT
12 treated at 3:00 pm w/ Cooling
13 —
14 filling from ~~[illegible]~~ acid treat Full
15 > move to 9 & 14
16
17 mt
18 floor
19 —
~~20 LTU~~ MT
VK 21 good oil GTG
~~22 YPSP treated~~ WID. MT
8:48 23 A-Water
~~24 T3~~ MT
25 good oil full WAIT ΔW
*26 filling good oil GTG
27 > mt
28
~~29 T3~~ 1/4
30 Down to FBX

Note's
12 put A-Water #23 good oil
26 + 21

9001 SLUDGE

9004 DONE 5:15
9005 DONE 5:45
9006 MIA

Danya

4-9-00 Aft

9 FULL
10 NELSON
11 FILLING LTV x 1 6000
12 MT
13 —
14 FULL
15 mt
16
17 MT
18 FLOOR
19 —
20 mt
21 GOOD OIL - FULL
A 22 A WATER ↑ 1/2
S 23 A WATER FULL
24 MT
25 ~~GOOD OIL~~ MT
26 GOOD OIL - BOTTOM DROPPED
27 mt
28 mt
29 ↓ 1/4 T-3
30 N.I.V.

NOTES: TANK 24 WAS MT, TANK 29 WAS ↓ 1/4

DONE 9000 > LOADED 6250 SLUDGE ON LOWER ~~PAD~~
DONE 9001 >
9002 — N.I.V. #5000 IS EMPTY
9003 MT
DONE 9004 LOADED 6250 GOOD OIL *DOWN TO OIL ON T-1
DONE 9005 " " " "
DONE 9006 " " " " 9401 > MT
DONE 9405

good oil

4-10-00 mid

9 Full Treated at 9:30am 175° w/caustic
10 Nelson
11 filling
12 ~~mt~~ 1× warren
13 —
14 full Treated at 10:30 180° w/caustic
15 mt
16 mt
17 mt
18 floor
19 —
20 ~~20 mt~~ 1×YPSP Done need to dr
21 full good oil
22 a-water ↑½
23 full a-water
24 ~~mt~~ 1×YPSP Done Drop water
25 mt
26 good oil
27 mt
28 mt
29 mt
30 N.I.U

Note's

9006, is loaded for LTU
good Oil but not ~~[illegible]~~ in
right spot

id

175° w/caustic

180° w/caustic

ed to drop

water

r LTV

in

Afternoon 4-10-00

9 good oil moven to 26 MT
10 Nelson
11 treated at 900gm 170° w/ACID
12 treated at 730gm 180° good oil drop bottoms w/ACID
13 —
14 good oil ~~drop bottoms~~ MT
15 LTV+Buick Full
16 LTV
17 LTV Full
18 Floor
19 —
20 YPSI water drop + LTV
21 ~~YPSI water drop good oil level~~ full good
22 ~~[illegible]~~ oil 11 and 12
23 Full A water
24 YPSI Water drop 11 or 12
25 MT ~~good oil move into~~ MT
26 MT good oil moven into full
27 MT
28 T-3
29 T-3 Full
30 NIU

9006 moven into 20

1. Fill 28+29 with T-3 oil Done
2. Keep cleaning Tank + Plant
3. One Sludge Trailer is already Loaded
4. make Sure all Samples are Taken even to ever clear
5. 9000 - sludge
   9001 - sludge Done
   9002 - MT
   9003 - MT
   9004 - Good oil Done
   9005 - Good oil Done
   9006 - Good oil

9 mt
10 Nelson
11 ~~need to drop water~~ mt
12 ~~moven good oil to 21~~ mt
13 —
14 mt
15 full LTV + Buick
16 LTV
17 full LTV
18 floor
19 —
20 ~~YPSP treatable LTK~~ mt
21 good oil Full
22 oil 11+12
23 full A-water
24 YPSP 11+12
~~25 mt~~ good oil
26 good OPI full
27 mt
28 T3
29 T3 full
30 N.P.U

mt
mt

9 1x Buick Full treated at 130 am 170° w/caustic
10 Nelson
11 filling Full
12 filling Full treated at 1230 am 170° w/ACID
13 —
14 Ready for Caustic 8pm Treated W/C needheat
15 mt
16 > full LTV
17
18 floor
19 —
20 ~~mt~~ 1xYPSO
21 good oil full mix Det Diesel
22 mt Rouge + Grand Basic Full
23 full a. water ↓1/4
24 ↓1/4
25 good oil full mix Det Diesel
26 ~~good oil full mix Det Diesel~~ MT
27 mt
28 > T3
29 — full
30 N.P.U

Notes
9000 mt

1 only Discharge 5:00pm

2 only Load good oil from 25+26

3 ✓ T-3 Level

4 Skim T-5 if you can

4-11-00AFT

9 treated at 130am 170° with Caustic
10 ↓1/4 Water
11 Full theating
12 treated at 1230am 170
13
14 ↑3/4 theating
15 MT
16 11or12
17 11or12
18 Floor
19 —
20 YPST
21 good oil Full
22 ~~good oil~~ 11or12 Full LTV+Grand Blanc
23 LTV X1
24 ↓1/4
25 good oil Full
26 ~~MT~~ good oil
27 MT
28 T-3
29 T-3 Full
30 Dont ~~use~~ down for repairs

Notes
* 9000 MT
* ~~9006 is load in bay~~ 9006 need to be unloaded
* 9403 MT
* 9004 9005 load for LTV
* V3 be for you use it
* 9001 move to 23

* Stan I can not get any thing done if
[illegible]

C stic

9 ~~Moven to #3~~ mt fillied with Half of 14
10 mt
11 ~~[illegible]~~ treated at 10:30 Am at 190° w/ACID
12 mt filling LTU + Buick + 23 Full
13 —
14 ~~Cooling~~ Split Between 9+14 treated w/c 150
15 mt
16 11 and 12
17 11 and 12
18 floor
19 —
20 YPSP treated 180 w/caustic need to drop water drop water
21 full good oil
22 full 11 or 12
23 LTU + 1 Full
24 mt
25 full good oil ~~MT~~
26 full good oil
27 floor water
28 T3 full
29 T3 full
30 ~~[illegible]~~ N.P.U

Blanic

[Notes]

to be unloaded

9+14 are half top off with Buick then Hit whit acid

ng done E
and T

4-12-00AFT

✓ 9 treated at 1230am 170° good oil w/c ✓ For Bottom
10 MT
11 treated at 1030am 190 w/ACID good oil moven to 25+26
12 treated at 600pm 170° w/ACID good oil Moven to 25 MT
13 —
14 treated at 10pm 180 good oil moven to 26 MT.
15 MT
16 11 or 12
17 MT
18 Floor
19 —
✓ 20 LTV
21 good oil
22 11 or 12
23 11 or 12
24 MT
25 good oil moven into
26 good oil moven into full
27 Floor water
28 T-3
29 T-3
30 Do not use

Notes
* 9005 9004 9006 ready For LTV
* 9001 9000 ready For every clear

* ✓ 9 For bottoms

4-13-00 DAY

9 YPSI - Drop water
10 Rouge 1/4
11 Cooling (water dropped)
12 Cooling " "
13 —
14 YPSI (~~water dropped~~)
15 MT
16 ↓1/4
17 Buick
18 floor
19 —
20 11 or 12
21 Good oil
22 MT
23 A-water MT LTV
24 C+A water
25 Good oil → must ✓ for bottoms before using
26 Good oil
27 floor
28 T-3
29 T-3
30 N.I.U

Notes:

DAY

4-13-00 AFT.

9 treated at 230 am 175° w/caustic
10 Down to oil
11 treated at 420 am 170° w/ACID
12 [redacted] Filling + heat
13 —
14 4PSI X1
15 Full Buick 11 or 12 moven to 12
16 ↓1/4 11 or 12 next to 12
17 Moven to 11 MT
18 Floor
19 —
20 MT
21 good oil full
22 good oil full
23 MT
24 ↓1/4 oil Next to 12
25 good oil
26 good oil
27 Floor
28 F3
29 F3
30 Do not use

Before using

Notes

* 9004 9005 Ready for LTV
9001 ~~[illegible]~~ move into 11

* Stan Tyrone will be leaving at 12 am 4-14-00 [redacted] and on 4-22-00 Sat 12 am

* Bill came in at 1030 ~~[illegible]~~ ~~[illegible]~~

4-13-00

9 moven a water
10 Down to opl
11 treated at 420am 120° moven A-Water
12 ~~filling~~ treated At 12pm temp 180° w/ACI
13 —
14 1 YPSP
15 mt
16 mt
17 mt
18 floor
19 —
20 mt
21 full good opl
22 full good opl
23 mt
24 Mt
25 good opl
26 ~~good opl~~ MT
27 floor
28 T3
29 T3
30 N.P.U.

ACIS ENVIRONMENTAL LABORATORIES

2616 CLIFFORD - DETROIT, MI. 48201
(313) FAX (313) 964-1203

SPECIALISTS IN ENVIRONMENTAL TECHNOLOGY

REPORT #: 01297-00593-3
REPORT DATE: 1-15-98

P.O.#: Verbal

SRS/SYBILL, INC.,
111 Military
Detroit, MI 48209

Attn: Mr. Gary Berndt

Sample of: One (1) Oil labeled: [redacted] Three (3) Month Sample.

Services Requested: Perform Analysis per SRS Three (3) Month Analysis Schedule - ASTM - EPA Test Methods.

Results:

METALS (PPM) PARAMETERS	METHOD	ANALYSTS/DATE	RESULTS
Arsenic	6010	CR/ 1-6-98	=1.0 5
Cadmium	6010	CR/ 1-6-97	=0.5 1
Chromium	6010	CR/ 1-6-97	=2.5 5
Lead	6010	CR/ 1-6-97	3.0 5
Beryllium	6010	CR/ 1-6-97	=1.0
Manganese	6010	CR/ 1-6-97	=1.0
Mercury	6010	CR/ 1-6-97	=0.1 .2
Nickel	6010	CR/ 1-6-97	=1.0

Note: = Denotes Less Than.

Results Representative of sample as submitted to Laboratory.

ACIS ENVIRONMENTAL LABORATORIES

Caulton Ray, Jr.,
Manager

CR:rw

Complainant's Exhibit 20

ACIS ENVIRONMENTAL LABORATORIES
2516 CLIFFORD - DETROIT, MI. 48201

Sample I.D.: 01297-00593-3
Sample Date: 12-16-97
Sample Matrix: Oil

Results:(continued)

PARAMETER	METHOD	ANALYSTS/DATE	RESULTS
Sulfur %	D-1552	CR/ 12-19-97	0.70%
Halogens (PPM)	9077	CR/ 12-29-97	2600
Ash %	D-482	DJ/ 12-29-97	=0.1%
API Gravity	---	DJ/ 12-29-97	27.5
Density	---	DJ/ 12-29-97	0.8895
Flash Point (Ig)	1010	DJ/ 12-30-97	300°F
Pour Point	D-97	DJ/ 12-30-97	-15°F
B S & W %	D-96	DJ/ 1-6-98	1.2%
Viscosity @40°C	D-445	DJ/ 1-6-97	28 cs/133 SU
Water	---	CR/ 1-6-97	0.60%
PCB (Total)	8080	CR/ 12-29-97	=1.0
1242	8080	CR/ 12-29-97	=1.0
1260	8080	CR/ 12-29-97	=1.0
Btu/gal.,	D-240	CR/ 1-6-97	140,200

Note: = Denotes Less Than.

ACIS ENVIRONMENTAL LABORATORIES

ACIS ENVIRONMENTAL LABORATORIES

2616 CLIFFORD - DETROIT, MI. 48201
(313) 964-3119 FAX (313) 964-1203

SPECIALISTS IN ENVIRONMENTAL TECHNOLOGY

REPORT #: 0997-00439-3
REPORT DATE: 10-7-97

P.O.#: Verbal

SRS/SYBILL, INC.,
111 Military
Detroit, MI 48209

Attn: Mr. Gary Berndt

Sample of: One (1) Oil labeled: [redacted] Three (3) Month Sample.

Services Requested: Perform Analysis per SRS Three (3) Month Analysis Schedule - ASTM - EPA Test Methods.

Results:

METALS (PPM)	METHOD	ANALYSTS/DATE	RESULTS
Arsenic	6010	CR/ 9-18-97	=1.0 5
Cadmium	6010	CR/ 9-18-97	=0.5 1
Chromium	6010	CR/ 9-18-97	=2.5 5
Lead	6010	CR/ 9-18-97	2.5 5
Beryllium	6010	CR/ 9-18-97	=1.0
Manganese	6010	CR/ 9-18-97	=1.0
Mercury	6010	CR/ 9-18-97	=0.1 .2
Nickel	6010	CR/ 9-18-97	=1.0

Note: = Denotes Less Than.

ACIS ENVIRONMENTAL LABORATORIES

Caulton Ray, Jr.
Manager

CR:rw

Complainant's Exhibit 18

ACIS ENVIRONMENTAL LABORATORIES
2616 CLIFFORD - DETROIT, MI. 48201

Sample I.D.: 0997-00439-3
Sample Date: 9-10-97
Sample Matrix: Oil

Results:(continued)

PARAMETER	METHOD	ANALYSTS/DATE	RESULTS
Sulfur %	D-1552	CR/ 9-15-97	0.60%
Halogens (PPM)	9077	CR/ 9-15-97	2975
Ash %	D-482	DJ/ 9-24-97	=0.1%
API Gravity	---	DJ/ 9-24-97	27.8
Density	---	DJ/ 9-24-97	0.8873
Flash Point (Ig)	1010	DJ/ 9-24-97	260°F
Pour Point	D-97	DJ/ 9-30-97	-25°F
B S & W %	D-96	DJ/ 9-30-97	1.2%
Viscosity @40°C	D-445	DJ/ 9-30-97	25.5 cs/122 SU
Water	---	CR/ 9-30-97	=0.5%
PCB (Total)	8080	CR/ 9-15-97	=1.0
1242	8080	CR/ 9-15-97	=1.0
1260	8080	CR/ 9-15-97	=1.0
Btu/gal.,	D-240	CR/ 9-30-97	140,050

Note: = Denotes Less Than.

ACIS ENVIRONMENTAL LABORATORIES

ACIS ENVIRONMENTAL LABORATORIES

2816 CLIFFORD - DETROIT, MI. 48201
(313) 964-3119 FAX (313) 964-1203

SPECIALISTS IN ENVIRONMENTAL TECHNOLOGY

REPORT #: 0697-00300-2
REPORT DATE: 7-24-97

P.O.#: Verbal

SRS/SYBILL, INC.,
111 Military
Detroit, MI 48209

Attn: Mr. Gary Berndt

Sample of: One (1) Oil sample labeled: [redacted] Three (3) Month Sample.

Services Requested: Perform Analysis per SRS Three (3) Month Analysis Schedule- ASTM - EPA Test Methods.

Results:

METALS (PPM)

PARAMETERS	METHOD	ANALYSTS/DATE	RESULTS
Arsenic	6010	CR/ 6-26-97	=1.0
Cadmium	6010	CR/ 6-26-97	=0.5
Chromium	6010	CR/ 6-26-97	=2.5
Lead	6010	CR/ 6-26-97	3.0
Beryllium	6010	CR/ 6-26-97	=1.0
Manganese	6010	CR/ 6-26-97	=1.0
Mercury	6010	CR/ 6-26-97	=0.1
Nickel	6010	CR/ 6-26-97	=1.0

Note: = Denotes Less Than.
Results Representative of sample as submitted to Laboratory.

ACIS ENVIRONMENTAL LABORATORIES

Caulton Ray, Jr.
Manager

CR:rw

Complainant's Exhibit 19

ACIS ENVIRONMENTAL LABORATORIES
2916 CLIFFORD - DETROIT, MI. 48201

Sample I.D.: 0697-00300-2
Sample Date: 6-20-97
Sample Matrix: Oil

Results:(continued)

PARAMETER	METHOD	ANALYSTS/DATE	RESULTS
Sulfur %	D-1552	CR/ 6-25-97	0.54%
Halogens (PPM)	9077	CR/ 6-25-97	2750
Ash %	D-482	DJ/ 7-10-97	0.14%
API Gravity	---	DJ/ 7-10-97	27.0
Density	---	DJ/ 7-10-97	0.8923
Flash Point (Ig)	1010	DJ/ 7-14-97	260°F
Pour Point	D-97	DJ/ 7-14-97	-20°F
B S & W %	D-96	DJ/ 7-14-97	1.2%
Viscosity @40°C	D-445	DJ/ 7-15-97	30 cs/142 SUS
Water	---	DJ/ 7-10-97	0.4%
PCB (Total)	8080	CR/ 6-25-97	=1.0
1242	8080	CR/ 6-25-97	=1.0
1260	8080	CR/ 6-25-97	=1.0
Btu/gal.,	D-240	CR/ 6-25-97	140,750

Note: = Denotes Less Than.

ACIS ENVIRONMENTAL LABORATORIES

ACIS ENVIRONMENTAL LABORATORIES

2616 CLIFFORD - DETROIT, MI. 48201
(313) 964-3119 FAX (313) 964-1203

SPECIALISTS IN ENVIRONMENTAL TECHNOLOGY

REPORT #: 0397-00199-2
REPORT DATE: 4-10-97

P.O.#: Verbal

SRS/SYBILL, INC.
111Military
Detroit, MI 48209

Attn: Mr. Gary Berndt

Sample of: one (1) oil labeled: 3-12-97 Three (3) Month Sample.

Services Requested: Perform analysis per SRS three (3) month analysis schedule - ASTM- EPA Test Methods.

Results:

METALS (PPM)

PARAMETERS	METHOD	ANALYSTS/DATE	RESULTS
Arsenic	6010	CR/3-17-97	=1.0
Cadmium	6010	CR/3-17-97	=0.5
Chromium	6010	CR/3-17-97	1.5
Lead	6010	CR/3-17-97	3.5
Beryllium	6010	CR/3-17-97	=0.5
Manganese	6010	CR/3-17-97	=0.5
Mercury	6010	CR/3-17-97	=0.1
Nickel	6010	CR/3-17-97	=0.5

ACIS ENVIRONMENTAL LABORATORIES

Caulton Ray, Jr.
Manager

CR:mr

Complainant's Exhibit 22

O.K.

ACIS ENVIRONMENTAL LABORATORIES
3816 CLIFFORD - DETROIT, MI. 48201

Sample I.D.: 0397-00119-2
Sample Date: 3-12-97
Sample Matrix: Oil

Results (continued)

PARAMETER	METHOD	ANALYSTS/DATE	RESULTS
Sulfur %	D-1552	CR/3-19-97	0.63%
Halogens (PPM)	9077	CR/3-19-97	2850
Ash %	D-482	DJ/3-18-97	=0.1%
API Gravity		DJ/3-18-97	27.7
Density		DJ/3-18-97	0.8883
Flash Point (Ig)	1010	DJ/3-18-97	220°F+
Pour Point	D-97	CR/3-19-97	-30°F
B S & W	D-96	DJ/3-18-97	1.0%
Viscosity @40°C	D-445	DJ/3-18-97	26cs/124 SUS
Water		CR/3-19-97	=0.5%
PCB (Total)	8080	CR/3-20-97	=1.0
1242	8080	CR/3-20-9	=1.0
1260	8080	CR/3-20-97	=1.0
BTU/Gal.	D-240	CR/3-19-97	141,500

ACIS ENVIRONMENTAL LABORATORIES

= denotes less than

ACIS LABORATORIES

2600 CLIFFORD - DETROIT, MI. 48201
(313) 964-3119 FAX (313) 964-1203

SPECIALISTS IN PETROLEUM TECHNOLOGY

REPORT #: E-01095-59-1
REPORT DATE: 10-25-95

P.O.#: Verbal

SYBILL, INC.,
111 Military
Detroit, MI 48209

Attn: Mr. Gary Berndt

Sample of: Sludge from Oil Reclamation- Sample #LF 301- 9-29-95.

Services Requested: Perform Analysis to determine:

Total Halogens- ASTM D-808(Digestion)
ASTM D-512 (Chlorine)

Results:

Total Halogens ----------1012 PPM

Dates of Analysis: 10-23-24-95
Analyst: CR

The test results are representative of the sample as submitted to Laboratory.

ACIS LABORATORIES

Caulton Ray, Jr.,
Manager

CR:rw

NCE8

ACIS LABORATORIES

2600 CLIFFORD · DETROIT, MI 48201
(313) 964-3119 FAX (313) 964-1203

SPECIALISTS IN PETROLEUM TECHNOLOGY

REPORT #: 9410-3183
REPORT DATE: 10-19-94

P.O.#: Verbal

SYBILL, INC.,
111 Military
Detroit, MI 48209

Attn: Mr. Gary Berndt

Sample of: Wastewater Treatment Sludge- 10-14-94.

Services Requested: Perform Analysis to determine:

TCLP- SW 846.

Dates of Analysis: 10-14-17-18-94
Analysts: DJ/CR/RR

Results reported on attached pages.

ACIS LABORATORIES

Carlton Ray, Jr.,
Manager

CR:rw

SPECIALIST IN PETROLEUM TECHNOLOGY-CHEMISTRY AND RELATED SUBSTANCES
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ACIS LABORATORIES
2600 CLIFFORD • DETROIT, MI. 48201

Sample I.D.: 9410-3183
Sample Date: 10-14-94
Sample Matrix: Sludge

EPA #:		LIMITS	
	PARAMETERS		
D001	**Ignitability:** Flash Point(T.C. °F)	140°F Min.,	180°F+
D002	**Corrosivity:** pH	2 - 12.5	6.2
D003	**Reactivity:**		
	Cyanide	---	N/D
	Sulfides	---	=10
	TCLP: Mg/l		
D004	Arsenic	5.0	1.5
D005	Barium	100	2.0
D006	Cadmium	1.0	=0.1
D007	Chromium	5.0	1.4
001D	Copper	100	=1.0
D008	Lead	5.0	=1.0
D009	Mercury	0.20	=0.1
	Nickel	---	=1.0
D010	Selenium	1.0	0.12
D011	Silver	5.0	=1.0
003D	Zinc	500	2.0

Note: = denotes less than.

ACIC LABORATORIES
2800 CLIFFORD • DETROIT, MI. 48301

Sample I.D.: 9410-3183
Sample Date: 10-14-94
Sample Matrix: Sludge

PARAMETERS	REG., LIMITS	DETECTION LIMIT	RESULTS
TCLP: Mg/l Extract Level			
O-Cresol	200	0.1	=5
M-Cresol	200	0.1	=5
P-Cresol	200	0.1	=5
Cresol	200	0.1	=5
2,4-Dinitrotoluene	0.13	0.1	U
Hexachlorobenzene	0.13	0.1	U
Hexachlorobutadiene	0.5	0.1	U
Hexachloroethane	3.0	0.1	U
Nitrobenzene	2.0	0.1	U
Pentachlorophenol	100	0.5	U
Pyridine	5.0	1	U
2,4,5-Trichlorophenol	400	0.2	U
2,4,6-Trichlorophenol	2.0	0.2	U
Chlordane	0.03	0.005	U
Endrin	0.02	0.002	U
Hepachlor	0.008	0.001	U
Hepachlor epoxide	0.008	0.001	U
Lindane	0.4	0.001	U
Methoxychlor	10	0.005	U
Toxaphene	0.5	0.001	U
2,4-D	10	0.05	U
Silvex	1.0	0.02	U
ZHE: Mg/l Extract Level			
Benzene	0.5	0.004	U
Carbon Tetrachloride	0.5	0.002	U
Chlorobenzene	100	0.002	U
Chloroform	6.0	0.01	U
1,4-Dichlorobenzene	7.5	0.004	U
1,2-Dichloroethane	0.5	0.003	U

U - Analyte not detected at Method Detection Limit.

ACIS ENVIRONMENTAL LABORATORIES

2816 CLIFFORD - DETROIT, MI. 48201
(313) 964-5230 FAX (313) 964-1203

SPECIALISTS IN ENVIRONMENTAL TECHNOLOGY

REPORT #: E-01195-79
REPORT DATE: 11-14-95

P.O.#: 0804

SYBILL, INC.
111 MIlitary
Detroit,MI 48209

Attn: Mr. Nickolas Dibrano

Sample of: Two (2) samples of liquid labeled: Source of Samples
Oil Storage tanks

1. DI-0101
2. SO 0102

Services Requested: Perform analysis to determine the following:

1. PCB EPA 8080
2. Halogens EPA 9077/ASTM D808
3. Metals EPA SW 846

Results reported on attached page.

Dates of Analysis: 11/10-13-14/95
Analysts: CR/DJ

ACIS ENVIRONMENTAL LABORATORIES

Caulton Ray, Jr.
Manager

CR/mr

OIL

AQIS LABORATORIES
2600 CLIFFORD - DETROIT, MI 48201

Sample I.D.: E 01195-79
Sample Date: 11-9-95
Sample Matrix: Liquid

EPA #:	PARAMETERS	LIMITS	RESULTS SO-0102	RESULTS DI 0101
D001	Ignitability:			
	Flash Point (T.C.O.F)	-140°F Min.	180+	180+
D002	Corrosivity			
	pH	2 -12.5	7.8	8.2
D003	Reactivity:			
	Cyanide		=5	=5
	Sulfides		=5	=5
	TCLP: Mg/l			
D004	Arsenic	5.0	=1.0	=1.0
D005	Barium	100	1.2	=1.0
D006	Cadmium	1.0	=0.1	=1.0
D007	Chromium	5.0	=1.0	=1.0
001D	Copper	100	=1.0	=1.0
D008	Lead	5.0	=1.0	=1.0
D009	Mercury	0.20	=0.1	=0.1
	Nickel		=1.0	=1.0
D101	Selenium	1.0	=0.1	=0.1
D011	Silver	5.0	=1.0	=1.0
003D	Zinc	500	4.8	2.0
Total Halogens			130	110
PCB (Total Arochlors)			=1.0	=1.0

NOTE: = denotes less than

ACIS ENVIRONMENTAL LABORATORIES

2616 CLIFFORD - DETROIT, MI. 48201
(313) 964-5230 FAX (313) 964-1203

SPECIALISTS IN ENVIRONMENTAL TECHNOLOGY

REPORT #: E-01095-71
REPORT DATE: 11-8-95

P.O.#: Verbal

SYBILL, INC.,
111 Military
Detroit, MI 48209

Attn: Mr. Gary Berndt

Samples of: Four (4) Samples of Oil labeled: ~~10-23-95.~~ Mixed oil
Storage Tank at Sybill- Outbound Oil.

A-1
B-2
C-3
D-4

Services Requested: Perform Analysis to determine:

1. Total Halogens- EPA 9077
2. EPA- F001 - F002 / 40 CFR - 261.31 / EPA SW 846

Dates of Analysis: 10-27-30 / 11-6-95
Analysts: DJ/CR

The test results are representative of the samples as submitted to Laboratory.

Results reported on attached page.

ACIS ENVIRONMENTAL LABORATORIES

Caulton Ray, Jr.
Manager

CR:rw

SPECIALIST IN ENVIRONMENTAL TECHNOLOGY - RESOURCE RECOVERY
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ACIS ENVIRONMENTAL LABORATORIES
2016 CLIFFORD - DETROIT, MI. 48201

SYBILL, INC.,
REPORT #E-01095-71
Page-2-

PARAMETERS

EPA - 40 CFR 261.31 SUBPART D F001 - F002/EPA SW 846	MDL Ug/Kg/PPB	Results- Ug/Kg/PPB A-1	B-2	C-3	D-4
0.7 Tetrachloroethylene	10	=100	=100	=100	=100
0.5 Trichloroethylene	10	=100	=100	=100	=100
Methylene Chloride	10	=100	=100	=100	=100
1'1'1' - Trichloroethane	10	=100	=100	=100	=100
Carbon Tetrachloride	10	=100	=100	=100	=100
0.5 Chlorobenzene	10	=100	=100	=100	=100
1',1',2- Trichloro 1',1',2- Trifluorethane	---	=100	=100	=100	=100
Ortho-Dichlorobenzene	10	=100	=100	=100	=100
Trichlorofluoromethane	10	=100	=100	=100	=100
1,1,2- Trichloroethane	10	=100	=100	=100	=100
Total Halogens- EPA 9077(PPM)	---	1586	1905	1685	2197

Note: = denotes less than.

ACIS ENVIRONMENTAL LABORATORIES

Caulton Ray, Jr.,
Manager

CR:rw

Midwest Analytical Services, Inc.

"Where industry comes for answers"

Metropolitan Center for High Technology
2727 Second Avenue
Detroit, Michigan 48201

A2LA Accredited Certification # 0381-01
State of Wisconsin Certification #999941580
State of New Jersey Certification #62733
State of North Dakota Certification #R-085

P:1-800-801-4MAS (MI,OH,WI,IN,IL)
: (313) 964-3680
F: (313) 964-2339

Date : 12-Aug-96

Client : Gary Berndt
Sybill Inc.

Mas# : 60726001

PROJECT: : 3 MONTH OIL ANALYSIS SCHEDULE

Sample I.D. : OIL #1 STORAGE 7/25/96 8:00AM

The above mentioned project has been completed in accordance with the quality control and quality assurance criteria specified by the American Association of Laboratory Accreditation/SW 846/MDNR/WDNR and EPA references from 40 CFR part 136 guidelines.

For your convenience the following legend applies to all the following data sheets:
1. Reports shall not be reproduced, except in full, without written approval of Midwest Analytical Services, Inc.
2. N/D=Not detected above Estimated Quantitation Limit, N/A=Not applicable
3. Results relate only to the items tested.
4. mg/l, mg/kg, mg/kg(dry weight) equal ppm(parts per million)
µg/l, µg/kg, µg/kg(dry weight) equal ppb(parts per billion)

If you have any questions regarding this project please feel free to contact me at 1-800-801-4MAS or 1-313-964-3680.

Thanking You,

Sincerely,

Krystyna Czyzo

Krystyna Czyzo
Lab. Quality Manager

Complainant's Exhibit 23

Midwest Analytical Services, Inc.

"Where industry comes for answers"

Metropolitan Center for High Technology
2727 Second Avenue
Detroit, Michigan 48201

A2LA Accredited Certification # 0381-01
State of Wisconsin Certification #999941580
State of New Jersey Certification #62733
State of North Dakota Certification #R-085

P:1-800-801-4MAS (MI,OH,WI,IN,IL)
: (313) 964-3680
F: (313) 964-2339

IN: SMR
PAGE 1 OF 2

TEST REPORT

MAS #:6 0 7 2 6 0 0 1

Gary Berndt
Sybill Inc.
111 Military
Detroit, MI 48209-4102

DATE COMPLETED: 12-Aug-96

PROJECT: 3 MONTH OIL ANALYSIS SCHEDULE
SAMPLE IDENTIFICATION: OIL #1 STORAGE 7/25/96 8:00AM
PHYSICAL DESCRIPTION: OIL

FILE:WASTE\WCTC

METHOD #	PARAMETER	SAMPLE RESULT	UNITS	ESTIMATED QUANT. LIMIT	REGULATORY LIMIT	ANALYST	DATE ANAL.
SW 846 9045C	*pH/CORROSIVITY	7.79	UNITS	N/A	<2 : > 12.5 D002	MB	07/31/96
EPA 160.4	% ASH	N/D	%	1.0	----	CDT	08/01/96
ASTM D96	BOTTOM SEDIMENTS & WATER	0.90	%	0.10	----	CH	08/05/96
ASTM D5057M	DENSITY	7.30	lb/gal	N/A	----	CDT	08/02/96
ASTM D5057M	API GRAVITY	31	---	N/A	----	CDT	08/02/96
SW 846 1010	IGNITIBILITY	> 200	F	N/A	<140 D001	CDT	07/31/96
SW-846 9076	TOTAL HALOGENS	3,000	mg/kg	100	---	MB	08/01/96
ASTM D-97	POUR POINT	-35	F	N/A	----	**	07/30/96
ASTM D-445	VISCOSITY AT 40°C	23.8	cSt	N/A	----	**	07/30/96
ASTM D3792	% WATER	N/D	%	5.0	----	LAF	08/03/96
SW 846 9060M	CARBON	> 111,000	mg/kg	500	----	DJF	08/02/96
SW 846 6010	SULFUR	1,580	mg/kg	5.0	----	KRW	08/01/96
SW-846 8080A	PCB:		mg/kg		---	DGB	07/31/96
	AROCLOR 1016	N/D		1.0			
	AROCLOR 1221	N/D		1.0			
	AROCLOR 1232	N/D		1.0			
	AROCLOR 1242	N/D		1.0			
	AROCLOR 1248	N/D		1.0			
	AROCLOR 1254	N/D		1.0			
	AROCLOR 1260	N/D		1.0			

*SAMPLE pH MEASURED IN WATER AT 20.0°C.
**SUBCONTRACTED TO CLEVELAND TECHNICAL CENTER

Krystyna Czyzo
Lab. Quality Manager

Midwest Analytical Services, Inc.
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2727 Second Avenue
Detroit, Michigan 48201

A2LA Accredited Certification # 0381-01
State of Wisconsin Certification #999941580
State of New Jersey Certification #62733
State of North Dakota Certification #R-085

P:1-800-801-4MAS (MI,OH,WI,IN,IL)
: (313) 964-3680
F: (313) 964-2339

IN: SMR

TEST REPORT
(CONTINUED)

MAS #:60726001

PROJECT: 3 MONTH OIL ANALYSIS SCHEDULE
SAMPLE IDENTIFICATION: OIL #1 STORAGE 7/25/96 8:00AM
PHYSICAL DESCRIPTION: OIL

METHOD #	PARAMETER	SAMPLE RESULT	UNITS	ESTIMATED QUANT. LIMIT	REGULATORY LIMIT	ANALYST	DATE ANAL.
SW-846	TOTAL METALS		mg/kg		----		
6010A	ARSENIC	1.5		1.0		KRW	08/02/96
6010A	CADMIUM	N/D		0.50		KRW	08/02/96
6010A	CHROMIUM	1.1		1.0		KRW	08/02/96
6010A	LEAD	4.1		1.0		KRW	08/02/96

Krystyna Czyzo
Lab. Quality Manager

LABORATORY RESULTS

CLIENT: MARINE POLLUTION CONTROL - Transporter

REPORT NUMBER: 26382 SAMPLE ID: 3070153 DESCRIPTION: MPC JOB #9736 ROUGE STEEL WASTE STREAMS/6900T TANDEM MILL OIL

DATE SAMPLED.....: N/A
TIME SAMPLED.....: N/A

DATE RECEIVED.....: 07/02/93
TIME RECEIVED.....: 11:40

ANALYSES PERFORMED	ANALYTICAL RESULT	UNITS OF MEASURE	REGULATORY LIMIT	ANALYTICAL METHOD	RUN DATE	TECHN
TCLP RCRA**						
Ignitibility	> 200	Degrees F	< 140 F	EPA 1010	07/08/93	BP
Corrosivity	7.8	pH Units	< 2,>12.5	EPA 9040	07/07/93	JM
REACTIVITY						
As Cyanide	< 0.10	mg/l	VARIABLE	EPA 9010	07/07/93	DM
As Sulfide	< 0.50	mg/l	VARIABLE	EPA 9030	07/07/93	DM
Arsenic, TCLP	< 0.40	mg/l	5.0	EPA 6010	07/07/93	CH
Barium, TCLP	0.31	mg/l	100.0	EPA 6010	07/07/93	CH
Cadmium, TCLP	< 0.01	mg/l	1.0	EPA 6010	07/07/93	CH
Chromium, TCLP	< 0.02	mg/l	5.0	EPA 6010	07/07/93	CH
Copper, TCLP	0.11	mg/l	100.0	EPA 6010	07/07/93	CH
Lead, TCLP	< 0.10	mg/l	5.0	EPA 6010	07/07/93	CH
Mercury, TCLP	< 0.0025	mg/l	0.2	EPA 7470	07/07/93	CH
Selenium, TCLP	< 1.0	mg/l	1.0	EPA 6010	07/07/93	CH
Silver, TCLP (Silver)	< 0.03	mg/l	5.0	EPA 6010	07/07/93	CH
Zinc, TCLP (Zinc)	0.05	mg/l	500.0	EPA 6010	07/07/93	CH
TCLP ORGANICS**						
ZHE ORGANICS FOR TCLP RCRA**						
Benzene	< 0.005	mg/l	0.5	8010/8020	07/13/93	KZ
Carbon Tetrachloride	< 0.005	mg/l	0.5			
Chlorobenzene	< 0.005	mg/l	7.5			
Chloroform	< 0.005	mg/l	6.0			
1,2-Dichloroethane	< 0.005	mg/l	0.5			
1,1-Dichloroethene	< 0.005	mg/l	0.7			
Methyl Ethyl Ketone	< 0.05	mg/l	200.0			
Tetrachloroethene	< 0.005	mg/l	0.7			
Trichloroethene	< 0.005	mg/l	0.5			
Vinyl Chloride	< 0.05	mg/l	0.2			
BASE NEUTRALS, TCLP**						
Hexachlorobutadiene	0.89	mg/l	0.5	EPA 8100	07/08/93	LP
Hexachlorobenzene	< 0.10	mg/l	0.13			
2,4-Dinitrotoluene	< 0.10	mg/l	0.13			
Hexachloroethane	< 0.10	mg/l	3.0			
Nitrobenzene	< 0.10	mg/l	2.0			
1,4-Dichlorobenzene	< 0.005	mg/l	7.5			
Pyridine	< 0.10	mg/l	5.0			
ACID EXTRACTS, TCLP**						
M,O,P Cresol	< 0.10	mg/l	200.0	EPA 8040	07/08/93	LP
Pentachlorophenol	< 0.20	mg/l	100.0			
2,4,5-Trichlorophenol	0.47	mg/l	400.0			
2,4,6-Trichlorophenol	0.17	mg/l	2.0			
PESTICIDES, TCLP**						
Chlordane	< 0.01	mg/l	0.03	EPA 8080	07/13/93	MB
Heptachlor Epoxide	< 0.005	mg/l	0.008			

** TCLP results are not spike recovery corrected.

The results shown apply only to the sample analyzed. This report may only be reproduced in full, and may only be submitted to a third party with the written permission of MARINE POLLUTION CONTROL.

Canton Analytical Laboratory, Inc.

QA/QC DB

Complainant's Exhibit 13

LABORATORY RESULTS
CLIENT: MARINE POLLUTION CONTROL

REPORT NUMBER: 26382 SAMPLE ID: 3070153 DESCRIPTION: MPC JOB #9736 ROUGE STEEL WASTE STREAMS/6907 TANDEM MILL OIL

DATE SAMPLED.....: N/A
TIME SAMPLED.....: N/A

DATE RECEIVED.....: 07/02/93
TIME RECEIVED.....: 11:40

ANALYSES PERFORMED	ANALYTICAL RESULT	UNITS OF MEASURE	REGULATORY LIMIT	ANALYTICAL METHOD	RUN DATE	TECHN
Endrin	< 0.005	mg/l	0.02			
Gamma-BHC (Lindane)	< 0.02	mg/l	0.4			
Methoxychlor	< 0.01	mg/l	10.0			
Toxaphene	< 0.1	mg/l	0.5			
Heptachlor	< 0.005	mg/l	0.008			
HERBICIDES, TCLP**				EPA 8150	07/07/93	MS
2,4-D	< 0.02	mg/l	10.0			
2,4,5-TP (Silvex)	< 0.02	mg/l	1.0			

** TCLP results are not spike recovery corrected.

[illegible] MARINE POLLUTION CONTROL

Canton Analytical Laboratory, Inc.

QA/QC DB

ANALYTICAL REPROT FROM MARTIN ENVIRONMENTAL, March 20, 1998

Waste Rolling Solution is the #7C Tandem Mill Oil Wastestream

RO 60 is the Tandem Mill Oil

Martin Environmental Inc.
The Point of Quality

12610 Newburgh Road
Livonia, Michigan 48150
(313)591-1855, Fax (313)591-3331

ANALYTICAL REPORT

March 20, 1998

ECS
200 River Front Drive
Detroit, MI 48226

MEI Report Number: 4604
MEI Sample Number: 013610

Project Name: Rouge Steel Co.
Project Number: n/a

Date Submitted: 03/19/98
Purchase Order: n/a

Sample Description: Waste Rolling Solution - Tandem Mill oil c
Collection Date: 03/19/98

Parameters	Results	Units	MDL	Method	Analysis Date	Analyst
Organo-Chlorine Pesticides/PCBs						
Aldrin	ND	ppm	0.0025	8080	03/20/98	JDM
alpha-BHC	ND	ppm	0.0025	8080	03/20/98	JDM
beta-BHC	ND	ppm	0.0025	8080	03/20/98	JDM
gamma-BHC (Lindane)	ND	ppm	0.0025	8080	03/20/98	JDM
delta-BHC	ND	ppm	0.0025	8080	03/20/98	JDM
Chlordane	ND	ppm	0.02	8080	03/20/98	JDM
4,4'-DDD	ND	ppm	0.0025	8080	03/20/98	JDM
4,4'-DDE	ND	ppm	0.0025	8080	03/20/98	JDM
4,4'-DDT	ND	ppm	0.0025	8080	03/20/98	JDM
Dieldrin	ND	ppm	0.0025	8080	03/20/98	JDM
Endosulfan I	ND	ppm	0.0025	8080	03/20/98	JDM
Endosulfan II	ND	ppm	0.0025	8080	03/20/98	JDM
Endosulfan sulfate	ND	ppm	0.0025	8080	03/20/98	JDM
Endrin	ND	ppm	0.0025	8080	03/20/98	JDM
Endrin aldehyde	ND	ppm	0.0025	8080	03/20/98	JDM
Endrin ketone	ND	ppm	0.0025	8080	03/20/98	JDM
Heptachlor	ND	ppm	0.0025	8080	03/20/98	JDM
Heptachlor epoxide	ND	ppm	0.0025	8080	03/20/98	JDM
Methoxychlor	ND	ppm	0.05	8080	03/20/98	JDM
Toxaphene	ND	ppm	1.50	8080	03/20/98	JDM
PCB -Arochlor 1016	ND	ppm	0.50	8080	03/20/98	JDM
PCB -Arochlor 1221	ND	ppm	0.50	8080	03/20/98	JDM
PCB -Arochlor 1232	ND	ppm	0.50	8080	03/20/98	JDM
PCB -Arochlor 1242	ND	ppm	0.50	8080	03/20/98	JDM
PCB -Arochlor 1248	ND	ppm	0.50	8080	03/20/98	JDM
PCB -Arochlor 1254	ND	ppm	0.50	8080	03/20/98	JDM
PCB -Arochlor 1260	ND	ppm	0.50	8080	03/20/98	JDM
PCB -Arochlor 1262	ND	ppm	0.50	8080	03/20/98	JDM

Date Extracted: 03/20/98 Surrogate Recovery: Tetrachloro-m-xylene 77%

Martin Environmental Inc.
The Point of Clarity

12610 Newburgh Road
Livonia, Michigan 48150
(313)591-1855, Fax (313)591-3331

ANALYTICAL REPORT

March 20, 1998

ECE
200 River Front Drive
Detroit, MI 48226

MEI Report Number: 4604
MEI Sample Number: 013608

Project Name: Rouge Steel Co.
Project Number: n/a

Date Submitted: 03/19/98
Purchase Order: n/a

Sample Description: BO 60
Collection Date: 03/19/98

Parameters	Results	Units	MDL	Method	Analysis Date	Analyst
Organo-Chlorine Pesticides/PCBs in Water						
Aldrin	ND	ppm	0.0025	8080	03/20/98	JDM
alpha-BHC	ND	ppm	0.0025	8080	03/20/98	JDM
beta-BHC	ND	ppm	0.0025	8080	03/20/98	JDM
gamma-BHC (Lindane)	ND	ppm	0.0025	8080	03/20/98	JDM
delta-BHC	ND	ppm	0.0025	8080	03/20/98	JDM
Chlordane	ND	ppm	0.020	8080	03/20/98	JDM
4,4'-DDD	ND	ppm	0.0025	8080	03/20/98	JDM
4,4'-DDE	ND	ppm	0.0025	8080	03/20/98	JDM
4,4'-DDT	ND	ppm	0.0025	8080	03/20/98	JDM
Dieldrin	ND	ppm	0.0025	8080	03/20/98	JDM
Endosulfan I	ND	ppm	0.0025	8080	03/20/98	JDM
Endosulfan II	ND	ppm	0.0025	8080	03/20/98	JDM
Endosulfan sulfate	ND	ppm	0.0025	8080	03/20/98	JDM
Endrin	ND	ppm	0.0025	8080	03/20/98	JDM
Endrin aldehyde	ND	ppm	0.0025	8080	03/20/98	JDM
Endrin ketone	ND	ppm	0.0025	8080	03/20/98	JDM
Heptachlor	ND	ppm	0.0025	8080	03/20/98	JDM
Heptachlor epoxide	ND	ppm	0.0025	8080	03/20/98	JDM
Methoxychlor	ND	ppm	0.0025	8080	03/20/98	JDM
Toxaphene	ND	ppm	1.50	8080	03/20/98	JDM
PCB -Arochlor 1016	ND	ppm	0.50	8080	03/20/98	JDM
PCB -Arochlor 1221	ND	ppm	0.50	8080	03/20/98	JDM
PCB -Arochlor 1232	ND	ppm	0.50	8080	03/20/98	JDM
PCB -Arochlor 1242	ND	ppm	0.50	8080	03/20/98	JDM
PCB -Arochlor 1248	ND	ppm	0.50	8080	03/20/98	JDM
PCB -Arochlor 1254	ND	ppm	0.50	8080	03/20/98	JDM
PCB -Arochlor 1260	ND	ppm	0.50	8080	03/20/98	JDM
PCB -Arochlor 1262	ND	ppm	0.50	8080	03/20/98	JDM

Martin Environmental Inc.
The Pride of Quality

12610 Newburgh Road
Livonia, Michigan 48150
(313)591-1055, Fax (313)591-3331

ANALYTICAL REPORT

March 20, 1998

MEI Report Number: 4604
MEI Sample Number: 013608

RCE
200 River Front Drive
Detroit, MI 48226

Project Name: Rouge Steel Co.
Project Number: n/a

Date Submitted: 03/19/98
Purchase Order: n/a

Sample Description: BO 60
Collection Date: 03/19/98

Parameters	Results	Units	MDL	Method	Analysis Date	Analyst
PCB -Arochlor 1260	ND	ppm	0.05	8080	03/20/98	JDM

Reviewed By: JA

ACIS ENVIRONMENTAL LABORATORIES

2616 CLIFFORD - DETROIT, MI. 48201
(313) 964-3119 FAX (313) 964-1203

SPECIALISTS IN ENVIRONMENTAL TECHNOLOGY

REPORT #: 1198-1102-2
REPORT DATE: 11-25-98

P.O.#: Verbal
PROJECT #: EP TOXICITY
EPA 40 CFR-261.4(b)
Table 1- SW 846
Rouge - Day #28
11-13-98 SP- 1 & 2

CLIENT: SRS ENVIRONMENTAL
111 Military
Detroit, MI 48209

Attn: Mr. Gary Berndt

DATE RECEIVED : 11/13/98 **DATE ANALYZED:** 11/18/19/20/98 **ANALYZED BY:** CR/DJ/RR

PARAMETER EPA#	METHOD	MDL/Mg/1	Reg. Limit Mg/1	Results(Mg/1)
D-004 - Arsenic	7060	0.001	5.0	=1.0
D-005 - Barium	7080	0.10	100	=1.0
D-006 - Cadmium	7130	0.005	1.0	=0.1
D-007 - Chromium	7190	0.05	5.0	=1.0
D-008 - Lead	7420	0.10	5.0	=1.0
D-009 - Mercury	7470	0.0002	0.2	=0.005
D-010 - Selenium	7740	0.002	1.0	=0.2
D-012 - Endrin	7760	0.002	0.02	N/D
D-013 - Lindane	8080	0.001	0.4	N/D
D-014 - Methoxychlor	8080	0.005	0.5	N/D
D-015 - Toxaphene	8080	0.001	10.0	N/D
D-016 - 2,4,D	8151A	0.05	10.0	N/D
D-017 - 2,4,5,-TP (Silvex)	8151A	0.02	1.0	N/D
D-020 - Chlorodane	8080	0.005	0.03	N/D
D-031 - Heptachlor +Epoxides	8080	0.001	0.008	N/D

N/D Not Detected at Method Detection Limit
= Denotes Less Than.

ACIS ENVIRONMENTAL LABORATORIES

Caulton Ray, Jr.,
Manager

CR:rw

SPECIALIST IN ENVIRONMENTAL TECHNOLOGY - RESOURCE RECOVERY
REPORTS ARE SUBMITTED FOR THE EXCLUSIVE USE OF CLIENTS

ACIS ENVIRONMENTAL LABORATORIES

2616 CLIFFORD - DETROIT, MI 48201
(313) 964-3119 FAX (313) 964-1203

SPECIALISTS IN ENVIRONMENTAL TECHNOLOGY

№ #28

Chain of Custody

Analysis Request

1
Consultant: SRB
Serv. Sta#:
Sampler: STAN JENKINS
Phone: 313-841-6445
Location: TANK TRUCK
Phone:

2 Sample Identification	Collection Date	Collection Time	3 Grab	Composite	4 Matrix: Soil	Water	Other	Total # of Containers	5 Analysis Requested: EPA TCLP PROGRAM							Remarks
ROUGE / EPA #28 TANDEM MILL	11-13-98			✓			✓	1	✓							6 OILY WASTE WATER MIX
ROUGE / EPA #28 SKIM PASS 1/2	11-13-98			✓			✓	1	✓							

7
Turnaround time requested, (please circle): Emergency, Routine
(Call to confirm Emergency turnaround time.)

Rush analysis results via:
Fax#: 313-841-6446 -or- Phone: 313-841-6445

8 -This section MUST be signed each time the sample changes hands!-

Relinquished by	Date	Time	Received by	Date	Time
Gary Brunt	11-13-98		[illegible]	11-13-98	

9

Relinquished by	Date	Time	Received by	Date	Time

10
CONDITIONS OF SAMPLES UPON RECEIPT AT ACIS:
Sample Temp: A M 3 Preserved?: Damaged?:
Comments:
1198 01103

In case we have questions when the samples arrive, call:
Name: GARY D. BRUNDT SRB Phone: 313-841-6445
Send report to: 111 MILITARY DETROIT, MI 48209

ACIS ENVIRONMENTAL LABORATORIES

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(313) 964-3119 FAX (313) 964-1203

SPECIALISTS IN ENVIRONMENTAL TECHNOLOGY

REPORT #: 1198-1103
REPORT DATE: 11-25-98

P.O.#: Verbal
PROJECT #: EP TOXICITY
EPA 40 CFR-261.4(b)
Table 1- SW 846
Rouge - Day #29
11-16-98 SP-1 & 2

CLIENT: SRS ENVIRONMENTAL
111 Military
Detroit, MI 48209

Attn: Mr. Gary Berndt

DATE RECEIVED : 11-16-98 DATE ANALYZED: 11/18/19/20/98 ANALYZED BY: CR/DJ/RR

PARAMETER EPA#	METHOD	MDL/Mg/1	Reg. Limit Mg/1	Results(Mg/1)
D-004 - Arsenic	7060	0.001	5.0	=1.0
D-005 - Barium	7080	0.10	100	2.3
D-006 - Cadmium	7130	0.005	1.0	0.12
D-007 - Chromium	7190	0.05	5.0	=1.0
D-008 - Lead	7420	0.10	5.0	=1.0
D-009 - Mercury	7470	0.0002	0.2	=0.005
D-010 - Selenium	7740	0.002	1.0	=0.2
D-012 - Endrin	7760	0.002	0.02	N/D
D-013 - Lindane	8080	0.001	0.4	N/D
D-014 - Methoxychlor	8080	0.005	0.5	N/D
D-015 - Toxaphene	8080	0.001	10.0	N/D
D-016 - 2,4,D	8151A	0.05	10.0	N/D
D-017 - 2,4,5,-TP (Silvex)	8151A	0.02	1.0	N/D
D-020 - Chlorodane	8080	0.005	0.03	N/D
D-031 - Heptachlor +Epoxides	8080	0.001	0.008	N/D

N/D Not Detected at Method Detection Limit
= Denotes Less Than.

ACIS ENVIRONMENTAL LABORATORIES

Caulton Ray, Jr.,
Manager

CR:rw

ACIS ENVIRONMENTAL LABORATORIES

2616 CLIFFORD - DETROIT, MI 48201
(313) 964-3119 FAX (313) 964-1203

SPECIALISTS IN ENVIRONMENTAL TECHNOLOGY

No #29

Chain of Custody

Analysis Request

1
Consultant: SRS
Serv. Sta#:
Sampler: STAN JENKINS
Phone: 313-841-6445
Location: TANK TRUCK
Phone:

2

Sample Identification	Collection Date	Collection Time	Grab	Composite	Soil	Water	Other	Total # of Containers	EPA TEST PROGRAM							Remarks
(ROUGE/EPA #29 SKIMPASS 1/0)	11-16-98			✓			✓	1	✓							OILY WASTE WATER MIX

3 **4** Matrix **5** Analysis Requested **6**

7
Turnaround time requested, (please circle): Emergency, Routine
(Call to confirm Emergency turnaround time.)

Rush analysis results via:
Fax#: 313-841-6446 -or- Phone: 313-841-6445

8 -This section MUST be signed each time the sample changes hands!-

Relinquished by	Date	Time	Received by	Date	Time
[signature]	11-16-98		[signature]	11-16-98	

9

Relinquished by	Date	Time	Received by	Date	Time

10
CONDITIONS OF SAMPLES UPON RECEIPT AT ACIS:
Sample Temp: AMP. Preserved?: Damaged?:
Comments:

1198 01103

In case we have questions when the samples arrive, call:
Name: GARY D. BERNDT SRS Phone: 313-841-6445
Send report to: 111 MILITARY DETROIT, MI 48209

ACIS ENVIRONMENTAL LABORATORIES

2616 CLIFFORD - DETROIT, MI. 48201
(313) 964-3119 FAX (313) 964-1203

SPECIALISTS IN ENVIRONMENTAL TECHNOLOGY

REPORT #: 1198-1104-1
REPORT DATE: 11/25/98

P.O.#:Verbal
PROJECT #:EP TOXICITY
EPA 40 CFR-261.4(b)
Table 1- SW 846
Rouge - Day #30
11/17/98
SP - 1 & 2 3500 Gal.

CLIENT: SRS ENVIRONMENTAL
111 Military
Detroit, MI 48209

Attn: Mr. Gary Berndt

DATE RECEIVED : 11/17/98 **DATE ANALYZED:**11/18/19/20/98 **ANALYZED BY:**CR/DJ/RR

PARAMETER EPA#	METHOD	MDL/Mg/l	Reg. Limit Mg/l	Results(Mg/l)
D-004 - Arsenic	7060	0.001	5.0	=1.0
D-005 - Barium	7080	0.10	100	=1.0
D-006 - Cadmium	7130	0.005	1.0	=0.1
D-007 - Chromium	7190	0.05	5.0	=1.0
D-008 - Lead	7420	0.10	5.0	=1.0
D-009 - Mercury	7470	0.0002	0.2	=0.005
D-010 - Selenium	7740	0.002	1.0	=0.2
D-012 - Endrin	7760	0.002	0.02	N/D
D-013 - Lindane	8080	0.001	0.4	N/D
D-014 - Methoxychlor	8080	0.005	0.5	N/D
D-015 - Toxaphene	8080	0.001	10.0	N/D
D-016 - 2,4,D	8151A	0.05	10.0	N/D
D-017 - 2,4,5,-TP (Silvex)	8151A	0.02	1.0	N/D
D-020 - Chlorodane	8080	0.005	0.03	N/D
D-031 - Heptachlor +Epoxides	8080	0.001	0.008	N/D

N/D Not Detected at Method Detection Limit
= Denotes Less Than.

ACIS ENVIRONMENTAL LABORATORIES

Caulton Ray, Jr.,
Manager

CR:rw

received 3/28/2000 SRB

The extent of the chemical and/or materials composition, concentration and possible reactions of mixtures is quite large in volume and is contained in SYBILL's MSDS file located at the facility.

C. Quantities

Total volumes (maximum) and units on a monthly basis are shown in the table below.

Material	Maximum Capacity	Anticipated Volume Usage
Caustic Soda	6,000 gallons	> 5,000 gallons
Polymer	N/A	< 380 gallons
Weak Sulfuric	5,000 gallons	> 2,500 gallons
Conc. Sulfuric	500 gallons	> 100 gallons
Lime	10 tons	< 5 tons
Waste Water	24,750,000 gal	< 3,250,000 gal
Recycled Oil	500,000 gallons	<250,000 gallons

D. Site plan or diagram of material storage
(including storage and use areas, underground storage tanks, floor drains, loading docks, sump pumps, on-site water supply, secondary containment, etc.)

Reference Appendix " D ".

III. Storage Tanks 40 CFR 112.7 (e)(2)

A. Above ground storage tanks

1. Tank construction details.

The following matrix is a summary of the tank particulars.

	Tanks 1 & 2	Tanks 3 & 4	Tank 5	Tanks 11 & 12
Construction:	Steel Closed top	Steel Covered	Steel Open top	Steel Closed
Date of Construction:	1972	1967	1967	1994
Manufacturer:	Caldwell Tanks	Chicago B & I	Chicago B & I	G & M
Size:	35'W 40'H	64'W 15'H	44'W 15'H	30'L 10'H
Volume:	250,000 gallons	36,000 gallons	17,000 gallons	30,000 gallons
Coating: Exterior: Interior:	Paint	Paint Fiberglass	Paint Fiberglass	Paint
Loading/Unloading Procedures:	4" trash pump	4" trash pump	4" trash pump	4" trash pump

Special Devices:	Heat Coils	Stirring blades	Stirring blades	Heat Coils
Overfill protection:	Mechanical	Mechanical	Mechanical	Mechanical
Air Control:	Carbon Cans	Carbon Cans	N/A	A/C System
Secondary Containment:	Concrete wall Concrete and fiberglass floor	Same	Same	Pitch/Grade Sump

	Tanks 9 & 14	Tank 10	Tanks 15-17	Tanks 20-25
Construction:	Steel Closed	Steel Closed	Steel Closed	Steel Closed
Date of Construction:	1994	1994	1994	1994
Manufacturer:	G & M	G & M	G & M	Unknown
Size:	20'L 15'H	10'W 20' H	12'W 20'H	10'W 20'H
Volume:	25,000 gallons	10,000 gallons	15,000 gallons	20,000 gallons
Coating: Exterior: Interior:	Paint	Paint	Paint	Paint
Loading/Unloading Procedures:	4" trash pump	4" trash pump	4" trash pump	4" trash pump
Special Devices:	Heat Coils		Heat Coils	
Overfill protection:	Mechanical	Mechanical	Mechanical	Mechanical
Air Control:	A/C System	A/C System	A/C System	A/C System
Secondary Containment:	Pitch/Grade Sump	Pitch/Grade Sump	Pitch/Grade Sump	Pitch/Grade Sump

	Tank 18	Tank 19	Tanks S3-S4	
Construction:	Steel Closed	Steel Closed	Steel Closed	
Date of Construction:	1994	1994	1994	
Manufacturer:	Unknown	Unknown	Unknown	
Size:	15'W 205'H	18"L 12'H	10'W 10'H	
Volume:	18,000 gallons	18,000 gallons	8,000 gallons	
Coating: Exterior: Interior:	Paint	Paint Glass Lined	Paint	
Loading/Unloading Procedures:	4" trash pumps	4" trash pumps	4" trash pumps	
Special Devices:				
Overfill protection:	Mechanical	Mechanical	Mechanical	
Air Control:	A/C System	A/C System		
Secondary Containment:	Pitch/Grade Sump	N/A	Pitch/Grade Sump	

40 CFR 112.7.(VIII)(A)

Overfill protection for each tank includes, mechanical, and or audio/visual signal devices. All pumps or tankers must be shut down if visual signal devices are released. Signal devices are float type units which must be inspected daily. Non-functioning units will be repaired and recorded in the operators log book.

2. Secondary containment (b)

All tanks in the facility are contained. Exterior tanks have retaining wall containments and tanks within the processing facility are contained by the building and the "tipping floor" as described below.

Tanks 3,4 & 5

Containment for this area of the facility is accomplish by an 8' high 9" thick reinforced concrete wall. In addition splash guards have been installed on the concrete wall. Total containment volume exceeds 550,000 gallons and surpasses regulation of one and one-half times the volume of the largest tank (360,000 gals).

All drains have been back filled with concrete to preclude their use. The flooring of the containment area is concrete reinforced with fiberglass. The perimeter of the containment area is 77.5'X75' + 10'X75' + 59.5' X 127.5' or 14,148 square feet.

Tanks 1&2
Containment for this area of the facility is accomplished by an 6' high 10" thick reinforced concrete wall. The perimeter of each storage area is 85'X80' and containment volume exceeds 305,000 gallons. There are no drains within this containment. The containment area flooring is concrete reinforced with fiberglass.

Tanks 9, 14, 10, 11, 12, 15-17, 20-30, 18

These tanks are inside the Processing Building. The ground floor has a 5' concrete block wall which turns to sheet metal on iron framework. This building has a concrete "tipping" floor. All drainage is contained in an isolated sump hole in the center of the "tipping" floor and our pumps discharge any spillage into the treatment tanks.

Piping and valves

(1) Piping and valves shall be inspected daily/weekly for damage or corrosion. Heat trace and insulated lines need to be repaired as soon as any damage is found, to avoid freezing of lines. Pipe lines at this facility do not require to be cataodically protected, also no piping systems are located below grade/underground.

(2) Pipelines which have been removed from service for extended periods must be capped and or blank-flanged. All pipelines within the facility must be marked i.e., oil, gas, water.

(3) All pipe supports within the facility are permanent type hard welds expansion/contraction is limited on lines. Abrasion is not a concern with this type of support. Lines are inspected daily/weekly.

Pipelines and valves in the facility do not require pressure testing. Each pipeline and valve will be tested/examined daily and weekly. Testing and examination will include all flange joints, expansion joints, valve glands, and supports.

3. Maintenance

Daily inspections are conducted to verify that the containment areas are in tact and that no spillage is occurring. Rain water and snow melt water will be monitored daily and pumped into treatment tanks. The topography of the facility precludes flooding.

B. Underground storage tanks

There are no underground storage tanks at this facility.

C. Effluent Water 40 CFR 112.7 (ix)

SRS does not discharge pretreated wastewater effluent into navigable waters. All effluent waters are discharged to the local POTW for additional treatment (City of Detroit system).

IV. Storage Buildings, Warehouses, Production Buildings, Loading Docks

A. Description
(construction materials)

1. Powerhouse building

This building is a 17,000 square foot five story powerhouse building constructed in 1952 of block and brick over a steel girder frame. This building is not in use for processing or storage.

Lab Building

This is a 4,000 square foot building constructed in 1966 of block and brick over a steel girder frame. All potential spill pathways within the entire complex are tied into a self contained drainage and pump system which can pump any liquids into tanks 3 and 4. As noted above, former storm drains within tanks 3, 4 and 5 were back-filled with concrete to preclude accidental discharge. This building currently houses our analytical laboratory on the second floor plus an employee break area. Other than normal laboratory and cleaning supplies, chemicals are not contained within this structure and thus spillage is precluded.

Processing Building

This is a 16,000 square foot, 3 story building built in 1984. This former incinerator building is constructed with "knee" walls of concrete, six feet tall, upon which a steel girder framing system is attached. The walls and ceiling are fabricated from corrugated steel sheets. This building encloses a reinforced concrete "tipping" floor. The floor tilts from all angles to a 10 foot deep sump hole located in the center of the floor. No other drains exist. The sump hole is used to catch any spilled liquids. The in-plant pumps are then used to pump these spills back into the process tanks located within this building.

RCRA Used Oil Specific

1. For the shipment to Edwards Oil Service on MI manifest 7766184, provide arsenic, cadmium, chromium, lead, total halogens, and flash point analyses for batch 41694. Also, provide the total halogen analyses and rebuttal information for incoming waste streams that were treated to yield this shipment.

2. For the following customers, jobs, and work orders, describe the waste characterization process employed by Sybill prior to placement of the waste in tanks at Sybill. Support your answer with representative waste characterization documents for each customer (used oil generator). Specifically, why was BSW not determined and/or not reported for each shipment during the period from June 1, 1999 to March 27, 2000? (Reference tracking reports provided to U.S. EPA inspectors on March 28, 2000.)

115 Nelson Metal Products
413 Nelson Metals-Waste Water Pump Out
2645 Standing Work Order

351 City of Detroit
all jobs and work orders

439 Alpha Stamping
170 pump out pits and totes
3202 Pump out pits and totes

439 Alpha Stamping
170 pump out pits and totes
3226 Standing Work Order

442 Oscar W. Larson Company
174 Drop-off for Disposal - Wastewater and waste oil
1274 standing work order for waste water and waste oil

501 Metal Working Lubricants
346 GMC Blanket - GM PTG Livonia
2926 Inland Waters to Drop 20 Yd Vacuum sludge box at plant for processing - sta

501 Metal Working Lubricants
349 GMC Blanket - Lansing (LAD)
2366 Standing Work Order for GMC-LAD Plant 6 Drums Dropped off by Inland Wat

501 Metal Working Lubricants
409 Oily Waste Pickup from Lake Orion Plant
2639 Oily Waste Pickup - Standing Work Order

529 Waste Management Industrial Services
321 Oil/Water Pickup
1997 Standing Work Order - "Water from SRS into SRS" (2000) (somewhat different for 1999)

529 Waste Management Industrial Services
322 Mineral Oil Wastes
1980 Standing work order - pump out used oil frm various sites at complex

554 North American Environmental Corp.
443 Transport and Disposal of Rinse Water
3469 5K Vac Truck with 100 Feet of Hose

569 Steel Technologies
446 trans. and dispose of waste oil
3382 See Dan Rubino or Rich Meddy First, they will show you the inside pit they w

572 LTV Steel - Cleveland Works
439 LTV-Recycled Oil In and Used Out
3036 Standing Work Order - Used Oil Out of LTV

577 Michigan Recovery Systems, Inc.
454 Transport and Disposal of Oily Sludge from Warren
3173 Transport and Disposal of Oily Sludge

580 Manfredi Motor Transit Co.
462 Disposal of Waste Water
3317

584 Capital Environmental
465 transp. and disposal of non-haz. waste oil and water
3422 10,000 gallon tanker to pump out waste oil

585 Waste Management, Inc.
468 Pump out drums of used oil/coolant
3461 Standing Work Order Pump Out 40 or More drums of used oil and coolant

586 Everclear
470 Deliver/Receive Used Oil
3516 Standing Work Order for receipt/delivery of used oil from/to Ohio plant

589 American Ultra Specialties
471 disposal of liquid waste
3612

98 Rouge Steel

1 Wastewater Removal and Disposal
37 Tandem Mill Water - Large Tanker - Standing Work Order

3) To the extent that the total halogen concentration is available for incoming waste streams, identify all incoming wastestreams with total halogen concentrations above 1,000 ppm.

4) For all concentrations of total halogens over 1,000 ppm in incoming wastestreams, rebut the presumption that the used oil was mixed with a halogenated hazardous waste.

5) For all outbound shipments of used oil fuel, for the period from June 1, 1999 to March 27, 2000, cross-reference the record of used oil analysis or other information used to make the determination that the oil meets the specifications for arsenic, cadmium, chromium, lead, total halogens, and flash point. (Records of used oil fuel analysis have been provided, but the method of cross-referencing with tank-specific analyses and shipments from specific tanks was not demonstrated to U.S. EPA RCRA inspectors on March 27 and 28, 2000.) A photocopy of pages from an operating log book listing the tank & sampling date, tank from which shipped, analysis number, shipper/bill of lading/manifest number, transporter, and used oil fuel recipient would suffice, if it exists. Alternatively, if this information is included in the tracking report provided on March 28, 2000, please direct our attention to the appropriate fields.

TSCA Waste Oil Specific (see 40 CFR 761.3 and 761.20)

6) For all concentrations of total halogens over 1,000 ppm in incoming wastestreams and outbound fuel shipments, provide your determination that PCBs are not present at levels above 2 ppm. (Documents submitted in response to previous questions may be referenced.)

F:\user\sbrauer\usedoil\sybill\info request questions.wpd, 07/19/00SRB