ENGINEERING REPORT

Approved 1/9/023 w/ 1/6/03 letter

Remaining Phase 1 and Phase 2 Facility Cleaning Interim Remedial Measures Former Inland Fisher Guide Facility Syracuse, NY

General Motors Corporation Syracuse, NY

April 2002



New York State Department of Environmental Conservation

Division of Environmental Remediation Bureau of Central Remedial Action, 12th Floor 625 Broadway, Albany, New York 12233-7016 Phone: (518) 402-9768 • FAX: (518) 402-9020 Vebsite: www.dec.state.ny.us



January 9, 2003

James Hartnett General Motors Corporation Remediation Project Office Rte 37, Box 460 Massena, NY 13662-0460

Re: General Motors- Former Inland Fisher Guide Facility/ Ley Creek Deferred Media Site Administrative Order on Consent Index # D-7-0001-97-06 Remaining Phase 1 and Phase 2 Facility Cleaning Engineering Report

Dear Mr. Hartnett:

The New York State Department of Environmental Conservation has reviewed the above-named report dated April 2002 and the subsequent response dated January 6, 2003 (Report Addendum) to the Department's August 13, 2002 comments.

The Remaining Phase 1 and Phase 2 Facility Cleaning Engineering Report, as addended by GM's January 6, 2003 letter regarding this topic submitted pursuant to Paragraph II.B of the Consent Order Addendum, and Paragraph VI.C of the Consent Order, is approved, by the New York State Department of Environmental Conservation (NYSDEC). This Report, Addendum (including the O & M plan for the coated floors) and approval are hereby incorporated into the Consent Order Addendum executed under the above-referenced Index number.

As GM is aware, redevelopment IRM approvals under the Consent Order Addendum are subject to the remedial program that GM has agreed to implement at the Site. All IRMs are subject to modification or removal if necessary in order to prevent interference with the remedial program. However, as is expressed in the Consent Order Addendum, the NYSDEC has agreed to endeavor to avoid such determinations wherever possible.

Sincerely,

Susant Benjamn Susan L. Benjamin

bc:

ec:

Project Manager

D. Hesler/file (734057) S. Benjamin Daybook

C. Conyers J. Burke M. Cruden H. Hamel R. Nunes

L. Fitzpatrick B. Kogut C. Leary

cc:

To be putal Faulity Cleaning Phase 1 & 2 completion Report,

James F. Hartnett



Worldwide Facilities Group Environmental Services Remediation Team

Program Manager

April 25, 2002

Ms. Susan Benjamin, P.E. Bureau of Central Remedial Action Division of Environmental Remediation New York State Department of Environmental Conservation 50 Wolf Road, Room 228 Albany, New York 12233-7010

C E APR 2 6 2002 BUREAU OF CENTRAL **REMEDIAL ACTION**

Re: Former IFG Facility (Registry # 7-34-057) and Ley Creek Deferred Media <u>NYSDEC Order on Consent Index # D-7-0001-97-06</u> <u>Redevelopment Addendum – Certification of completion of Facility IRM Work in Syracuse Glass</u> <u>Company, Inc. Leasehold Space</u>

Dear Ms. Benjamin:

As described in my letter of February 28, 2002, General Motors has identified a new tenant (Syracuse Glass Company, Inc.) for a portion of the Syracuse main plant facility. My letter of February 28, 2002 provided a Tenant Use Notice for the space, and was provided to satisfy paragraph III.A of the November 23, 1999 Consent Order Addendum. At that time, the Facility Cleaning IRM activities were complete, with the exception of repairs to coated flooring that was damaged during demolition of mezzanines in this area. The repairs to the coated flooring have been completed.

O'Brien & Gere Engineers, Inc. has provided a certification of completion of the IRM cleaning activities in the Leasehold Space (with the exception of the floor coating in Bays J11, J13A and portions of bays H11, H12, and H13A), and a copy of that certification is attached. The Engineering report for the Remaining Phase 1 and Phase 2 Facility Cleaning IRMs dated April 5, 2002 documented that Bays J11, J13A and portions of Bays H11, H12 and H13A were coated, though it was noted that some damage to these floors had occurred since the coating had been applied. Attached is an original copy of the certification of completion of repairs to floor coating in Bays H3 through and including H12 and J3 through and including J12. Together, these certify that Facility Cleaning IRM activities are completed in the Syracuse Glass Company, Inc. Leasehold Space.

Please call me or Clare Leary at O'Brien & Gere (315-437-6100) with any questions.

Sincerely,

James F. Hentnet/ CP2

James F. Hartnett Remedial Program Manager

I:\DIV71\Projects\4966\30472\2_corres\2002\agencies\sbltr42502syrglass floor certification.doc Attachments cc: Distribution List

ENGINEER'S CERTIFICATION

Owner: General Motors Corporation

Site: Former Inland Fisher Guide (IFG) Facility Registry Site # 7-34-057

Project: Phase 2 IRM – Syracuse Glass Company, Inc. Leasehold Space

Engineer: O'Brien & Gere Engineers, Inc.

Contractor: Royal Environmental, Inc.

Recitals

1. General Motors Corporation (GM) and the New York State Department of Environmental Conservation (NYSDEC) entered into an Order on Consent (Index # D-7-0001-97-06) that became effective upon the execution of the Order by the NYSDEC on September 25, 1997 (the "Order"). The Order requires GM, among other things, to perform a Remedial Investigation/Feasibility Study at the Former IFG Facility (the "Site"). Paragraph VI of the Order provides for the performance of Interim Remedial Measures ("IRMs") at the Site.

2. The NYSDEC has reviewed the following documents (the "Phase 2 IRM Work Plan"), which make up the specifications for this work:

- Work Plan "Cleaning of the Syracuse Facility" prepared by Royal Environmental, Inc. May 1999;
- Sampling and Analysis Plan, Cleaning Program Verification Former Inland Fisher Guide Facility, Syracuse, New York, prepared by O'Brien & Gere Engineers, Inc., May 1999; and
- James F. Hartnett's (GM) letters to Susan Benjamin, P.E. (NYSDEC), dated August 26, 1999, September 28, 1999, November 5, 1999, and August 8, 2000.
- 3. NYSDEC approved the Phase 2 IRM Work Plan in its letters dated September 9, 1999, October 19, 1999, November 15, 1999, and September 12, 2000 to James F. Hartnett (GM).
- 4. As set forth in its Tenant Use Notice, dated February 28, 2002, GM proposes to lease a portion of the Site to Syracuse Glass Company, Inc. The proposed leasehold space is identified in the attached Figure 1.

Certification

The on-site observation of the Phase 2 IRM work in the Syracuse Glass Leasehold Space was performed under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, I hereby certify that the floor coating in Bays J3 through and including J12 and in Bays H3 through and including H12 has been repaired.

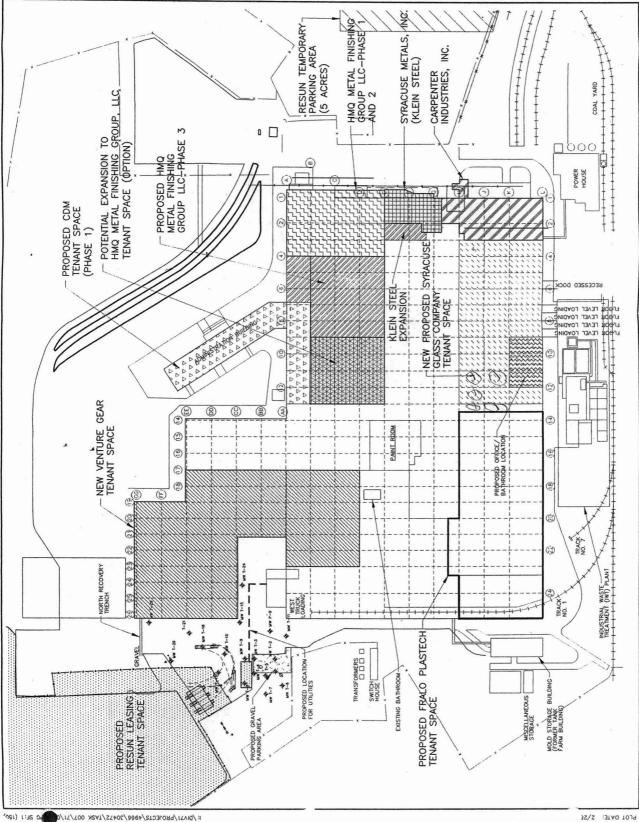
By: James R. Heckathorne, P.E.

Date: 4/25/02



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FIGURE 1 FIGURE 1 FIGURE 1



ENGINEER'S CERTIFICATION

Owner: General Motors Corporation

Site: Former Inland Fisher Guide (IFG) Facility Registry Site # 7-34-057

Project: Phase 2 IRM – Mitten Manufacturing, Inc. Leasehold Space

Engineer: O'Brien & Gere Engineers, Inc.

Contractor: Royal Environmental, Inc.

1.

2.

Recitals

General Motors Corporation (GM) and the New York State Department of Environmental Conservation (NYSDEC) entered into an Order on Consent (Index # D-7-0001-97-06) that became effective upon the execution of the Order by the NYSDEC on September 25, 1997 (the "Order"). The Order requires GM, among other things, to perform a Remedial Investigation/Feasibility Study at the Former IFG Facility (the "Site"). Paragraph VI of the Order provides for the performance of Interim Remedial Measures ("IRMs") at the Site.

The NYSDEC has reviewed the following documents (the "Phase 2 IRM Work Plan"), which make up the specifications for this work:

- Work Plan "Cleaning of the Syracuse Facility" prepared by Royal Environmental, Inc. May 1999;
- Sampling and Analysis Plan, Cleaning Program Verification Former Inland Fisher Guide Facility, Syracuse, New York, prepared by O'Brien & Gere Engineers, Inc., May 1999; and
 - James F. Hartnett's (GM) letters to Susan Benjamin, P.E. (NYSDEC), dated August 26, 1999, September 28, 1999, November 5, 1999, and August 8, 2000.
- 3. NYSDEC approved the Phase 2 IRM Work Plan in its letters dated September 9, 1999, October 19, 1999, November 15, 1999, and September 12, 2000 to James F. Hartnett (GM).
- 4. As set forth in its Tenant Use Notice, dated February 20, 2001, GM proposes to lease a portion of the Site to Mitten Manufacturing, Inc. The proposed leasehold space is identified in the attached Figure 1.

Certification

The on-site observation of the Phase 2 IRM work in the Mitten Manufacturing, Inc. Leasehold Space was performed under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, I hereby certify that, with the exception of floor coating in Bays J11, J13A and portions of

bays H11, H12, and H13A the Phase 2 IRM work in the Mitten Manufacturing, Inc. Leasehold Space has been completed in accordance with the Phase 2 IRM Work Plan and the Order.

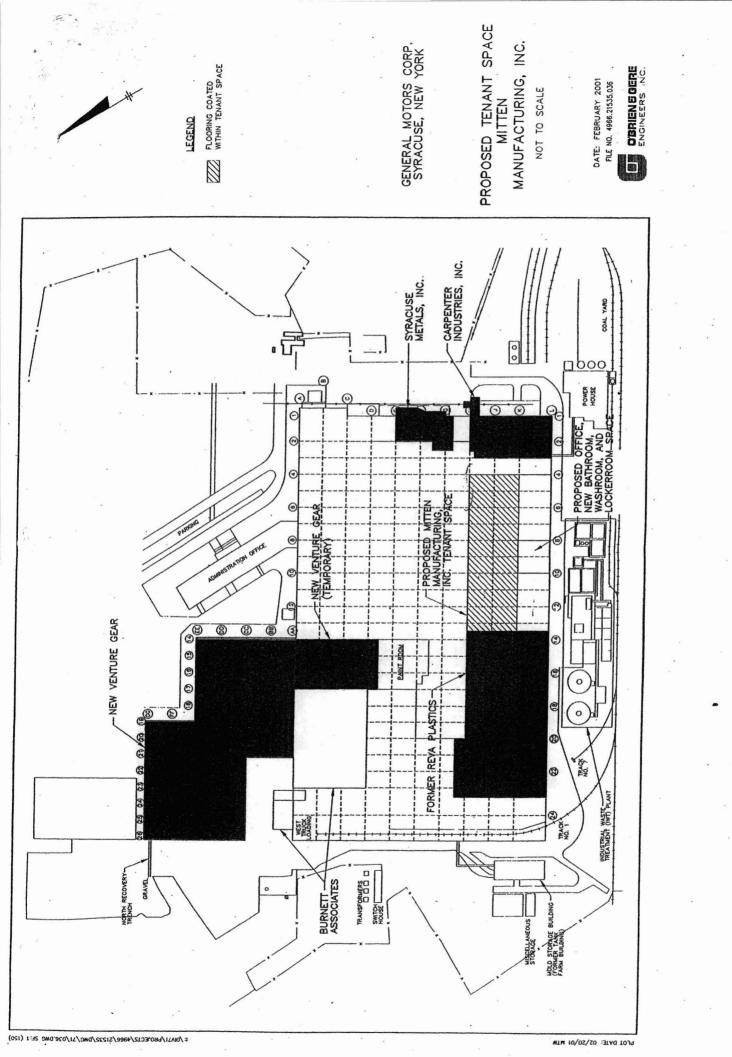
By:

James R. Heckathorne, P.E. Vice President O'Brien & Gere Engineers, Inc.



6.

Date: 2/20/01



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ENGINEERING REPORT

Phase 1 and Initial Phase 2 Facility Cleaning IRM Report Former IFG Facility (Site No. 7-34-057)

General Motors Corporation Syracuse, NY



James R. Heckathorne, P.E. Vice President

April 2002



Contents

List of Tablesii
List of Figuresii
List of Exhibitsii
1. Introduction 1
1.1. Overview
1.2. Site description
1.3. Site history
1.4. Phase 1 and Phase 2 IRM Work Plans 4
1.5. IRM scope summary 5
1.5.1. Remaining Phase 1 IRM 5
1.5.2. Phase 2 IRM
2. IRM implementation
2.1. Remaining Phase 1 IRM9
2.1.1. Floor surfaces
2.1.3. Pipe removal/decontamination
2.1.4. Miscellaneous cleaning tasks 10
2.2. Phase 2 IRM 10
2.2.1. Floor surface cleaning 10
2.2.2. Floor decontamination for reuse 11
2.2.3. Aboveground surface cleaning 12
2.2.4. IWTP oil reclamation system 12
2.2.5. Emulsion system, diesel fuel and sludge storage tanks 13
2.2.6. Fly ash hopper
2.2.7. Miscellaneous cleaning and demolition tasks
3. Material management 15
3.1. Cleaning water 15
3.2. Piping and equipment15
3.3. Pipe/equipment and sump/trench contents
3.4. Miscellaneous wastes
4. Engineer's certification17
References 19

O'Brien & Gere Engineers, Inc. Cleaning IRM\Ph1-2GM-

List of Tables

- 2-1 Floor and aboveground surfaces Verification Wipe Sample Data
- 2-2 Pipe and equipment Verification Wipe Sample Data
- 3-1 Remaining Phase 1 and Phase 2 IRM Material Characterization/Disposal
- 3-2 Facility Cleaning IRM Disposal Characterization Data

List of Figures

- 1-1 Site location map
- 1-2 Site plan
- 1-3 Floor cleaning
- 1-4 Aboveground surface cleaning
- 1-5 Process piping plan
- 2-1 Paint room emulsion system
- 2-2 Mold storage building
- 2-3 IWTP oil reclamation system and emulsion system
- 2-4 IWTP oil reclamation system and storage tanks
- 2-5 Fly ash hopper
- 2-6 Demolished structures

List of Exhibits

- A Manifest copies
- B NYSDEC approval letters for facility cleaning IRM work in leasehold spaces

1. Introduction

1.1. Overview

General Motors Corporation (GM) and the New York State Department of Environmental Conservation (the Department) entered into an Order on Consent (the "Order," Index # D-7-0001-97-06) that became effective upon the execution of the Order by NYSDEC on September 25, 1997. The Order requires GM, among other things, to perform a Remedial Investigation/Feasibility Study at the Former IFG Facility (the "site"). Paragraph VI of the Order provides for the performance of Interim Remedial Measures (IRMs) at the site.

The Phase 1 and Phase 2 IRMs comprise a portion of the facility cleaning IRM program conducted by GM to prepare the facility for redevelopment. Completion of most of the Phase 1 IRM activities and the Initial Phase 2 IRM activities was documented in the March 2000 engineering report (O'Brien & Gere 2000). The March 2000 completion report was approved by the Department in a letter dated July 28, 2000 (Benjamin 2000a).

This report documents implementation of the following:

- 1. Remaining Phase 1 facility cleaning IRM tasks not documented in the March 2000 certification report
- 2. Phase 2 facility cleaning IRM

These IRMs were conducted in accordance with the Phase 1 and Phase 2 IRM Work Plans, as described below, and the Order (including the Redevelopment Addendum, effective November 23, 1999). The Phase 1 and Phase 2 IRM Work Plans consist of a series of documents and correspondence between GM and NYSDEC, as described in Section 1.4 of this report. The specific scopes of the Phase 1 and Phase 2 facility cleaning IRMs are described in Section 1.5. Generally, the IRMs consisted of cleaning floors and aboveground surfaces, cleaning and dismantling various process systems, and removing residue from various facility sumps and drains. Floor and aboveground surface cleaning activities were performed to address the presence of polychlorinated biphenyls (PCBs) on these surfaces. For a period of time during facility operations, hydraulic fluids used in the injection molding operations contained PCBs. Portions of the aboveground surfaces and floors were cleaned to a wipe standard of 10 μ g/100 cm² during a partial facility cleaning program in 1997.

Phase 1 IRM surface cleaning activities addressed areas of the manufacturing building outside injection molding areas, with the exception of the 700 series and 800 series molder areas. The 700 series and 800 series molders were operated after 1976 and did not contain PCBs at concentrations greater than 50 parts per million (ppm). PCBs in dust on aboveground surfaces and on floors likely accumulated in these areas as a result of the facility air handling system and floor traffic, and are not attributable to spills of liquid PCBs greater than 50 ppm. Aboveground surfaces addressed by Phase 1 IRM surface cleaning activities in these areas were those that were not cleaned to the 10 μ g/100 cm² cleanup criterion during the partial facility cleaning program conducted in 1997.

Certain Phase I IRM activities related to miscellaneous cleaning were not completed for documentation in the March 2000 certification report. Certification of completion for these activities is documented in this report. These activities include:

- Cleaning of floors in Bays A1 through A4
- Removal and containerization of residuals from the paint room sump and emulsion sump
- Draining and powerwashing of the piping and pre-heater from boiler #4 and the remaining powerhouse boiler piping
- Draining, powerwashing, and dismantling of glycol piping (not performed because this piping is still useful)
- Draining, powerwashing, and dismantling of process piping in the mold storage building and between the mold storage building and the manufacturing building

Initial Phase 2 IRM activities addressed one area of the manufacturing building within the injection molding areas, which was identified for a potential tenant. Specifically, the Initial Phase 2 IRM covered Bays G20-23 (south of wall), H13-22, 23 (east of wall), J13-22, 23 (east of wall), and K13-22, 23 (east of wall).

Phase 2 IRM activities addressed cleaning activities required in the manufacturing building injection molder areas and the mold storage building. Cleaning and deactivation of various pieces of equipment located in the former fire pump house, powerhouse, industrial waste treatment plant (IWTP), and outside the manufacturing building adjacent

to the paint storage room were also included in the Phase 2 IRM activities. In addition to surface cleaning and equipment cleaning and deactivation, asbestos abatement was included in the Phase 2 IRM for the asbestos-containing material identified in the plant warehouse cooling towers, IWTP, guard shack, primary switch house, diesel pump house, mold storage building, powerhouse, and administration building. Paint sludge removal from the manufacturing building rooftop, the cleaning and disposal of the fly ash hopper and support structure, demolition of the mezzanines in the H Bays and the K Bays, and dismantling of a pipe along the H Bays related to former cooling processes were also included as Phase 2 IRM activities.

1.2. Site description

The Former IFG Facility is an approximate 65-acre facility located at 1 General Motors Drive in Syracuse, New York. A site location map is included as Figure 1-1, and a site map is included as Figure 1-2. Plant structures include the approximate 800,000 sq ft manufacturing building, as well as the powerhouse, IWTP, mold storage building, rail car building, and other miscellaneous structures and parking lots. The facility is bounded to the south by Conrail railroad tracks and a wood pallet recycling facility, to the east and northeast by GM Circle and Townline Road, to the west by a Niagara Mohawk Power Corporation (NMPC) electrical transfer station, and to the north by Factory Avenue and an undeveloped area adjacent to Ley Creek. The facility is located in an area zoned for industrial use in the Town of Salina; a small portion of the facility (entrance gate area and a portion of the parking lot) is located in the Town of Dewitt.

1.3. Site history

The plant began operations in 1952 as Brown-Lipe-Chapin, a division of GM. Operations conducted at the plant included metal die casting; nickel, chromium, and copper cyanide electroplating; stamping; polishing; buffing; painting; and machining. In 1961, Brown-Lipe-Chapin merged with another GM division, Ternstedt, and subsequently became part of the Fisher Body Division in 1968. During the early 1960's, injection molding operations were added to the existing operations, and metal finishing and die casting were completely replaced by injection molding by the early 1970's. The facility operated as the Fisher Guide Division of GM from 1984 to 1989. The plant then operated as the Inland Fisher Guide division from 1989 until cessation of production operations in 1993, the facility was reassigned to GM's North American Operations Property Management Group, which was later redesignated the Worldwide Facilities Group.

The facility is currently being redeveloped for tenant use. To date, Carpenter Industries, Inc., New Venture Gear, HMQ Metal Finishing Group, LLC, Klein Steel, Syracuse Glass Company, Camp, Dresser, McKee (CDM), and Fralo Plastech occupy space or are preparing to occupy space in the building. Of these tenant spaces, the spaces for HMQ Metal Finishing, CDM, and Syracuse Glass are located in areas of the facility cleaned under the Phase 2 Facility Cleaning IRM. Certifications for completion of Phase 2 Facility Cleaning IRM activities for portions of the facility to be occupied by these tenants were submitted to NYSDEC (Hartnett 2001a, and 2001b). NYSDEC approved certification for HMQ in its letter dated April 30, 2001 (Benjamin 2001b and 2001c). A Copy of the approval letter is included in Exhibit B. Certifications for CDM and Syracuse Glass have not yet been approved. The remaining spaces were in locations cleaned prior to completion of Phase 2 cleaning IRM activities.

1.4. Phase 1 and Phase 2 IRM Work Plans

The NYSDEC has reviewed the following documents (the "Phase 1 IRM Work Plan and Phase 2 IRM Work Plan"), which make up the specifications for this work:

- Work Plan, Cleaning of the Syracuse Facility, prepared by Royal Environmental, Inc., May 1999 (Royal Environmental 1999)
- Sampling and Analysis Plan, Cleaning Program Verification, Former Inland Fisher Guide Facility, Syracuse, New York, prepared by O'Brien & Gere Engineers, Inc., May 1999 (O'Brien & Gere 1999)
- Phase 1 statement of work as described in James F. Hartnett's (GM) letters to Susan Benjamin, P.E. (NYSDEC), dated April 30, 1999, May 5, 1999, May 13, 1999, May 18, 1999, and June 15, 1999
- Initial Phase 2 statement of work as described in James F. Hartnett's (GM) letter of August 5, 1999
- Phase 2 statement of work as described in James F. Hartnett's (GM) letters of August 26, 1999, September 8, 1999, September 28, 1999, November 5, 1999, March 2, 2000, August 8, 2000, and March 2, 2001.

NYSDEC approved the Phase 1 IRM Work Plan in its letters dated May 13, 1999, May 28, 1999, and June 17, 1999 to James F. Hartnett (GM) (Benjamin 1999a, 1999b and 1999c). USEPA approved the Phase 1 cleaning IRM approach in its letter dated May 14, 1999 (Stoller 1999a).

NYSDEC approved the Phase 2 IRM Work Plan in its letters dated July 22, 1999, August 11, 1999, October 19, 1999, November 15, 1999, September 12, 2000 and March 21, 2001 to Mr. Hartnett (Benjamin 1999d, 1999e, 1999f, 1999g, and 2000b). USEPA approved the Phase 2 IRM approach in its letters dated July 23, 1999, August 13, 1999, and April 4, 2000 (Stoller 1999b and 1999c; Greenlaw 2000).

1.5. IRM scope summary

1.5.1. Remaining Phase 1 IRM

As described in the March 2000 engineering report (O'Brien & Gere 2000), several Phase 1 activities remained to be completed as of March, 2000. These included cleaning the floors in Bays A1 through A4 and addressing the paint room and emulsion sumps, glycol piping, the piping and pre-heater for boiler #4 and remaining piping in the powerhouse, and process piping between the mold storage building and the manufacturing building.

The following cleaning procedures, which were demonstrated to be effective during the 1997 cleaning program, were identified to be used for floor cleaning for the remaining Phase 1 IRM areas (floors in Bays A1 through A4):

- Pressure washing of surfaces to remove visible dust and grime with wash waters to be treated at GM's IWTP and discharged in accordance with the State Pollutant Discharge Elimination System (SPDES) permit for the facility, which allows for treatment and discharge of remediation wastewaters.
- Visual inspection for clean surfaces.
- Wipe sampling (one sample per four bays, depending on configuration) to confirm attainment of the $<10 \ \mu g/100 \ cm^2$ surface PCB cleanup criterion.
- Additional pressure washing as needed to attain the visually clean standard or PCB surface cleanup criterion.
- Because confirmatory wipe data showed concentrations greater than the 10 μ g/100 cm² criterion, decontamination for re-use in accordance with 40 CFR 761.30(p) was also performed (*i.e.*, floors were coated). Decontamination for reuse is described in Section 1.5.2.

Other activities that were conducted related to the remaining Phase 1 IRM tasks were:

- Removal and containerization of residuals from the paint room sump and emulsion sump.
- Draining and powerwashing of the piping and pre-heater from boiler #4 and the remaining powerhouse boiler piping.
- Removal and containerization of residuals from the sumps in the mold storage building, powerwashing of the sumps, and filling of the sumps with concrete.
- Draining, powerwashing, and dismantling process piping in the mold storage building and between the mold storage building and the manufacturing building.

1.5.2. Phase 2 IRM

The Phase 2 IRM covered surface cleaning in Bays A5-A16, B2-B16, C2-C16, D2-D16, E2-E16, F2 (west of the wall) to F19, G2 (west of wall) to G19, H2 (west and north of wall) to H13A, J3-J13A, and K3-K13A, and in the mold storage building.

The overhead steel and walls in the injection molding areas of the manufacturing building that were not previously cleaned to $<10 \ \mu g$ PCBs/100 cm² were cleaned to attain a visually clean standard and the cleanup criterion of $<10 \ \mu g$ PCBs/100 cm², as verified by one wipe sample per type of surface (*e.g.*, overhead steel, wall) per four bays.

With the exception of the floor in the vicinity of injection molder series 300, 400 and 500 (Bays F3-F9, G3-G5, H3-H12 and J4-J12), the following surface cleaning approach was identified for the floors in the Phase 2 IRM area, based on floor characterization data:

- Pressure washing of surfaces to remove visible dust and grime with wash waters to be treated at GM's IWTP and discharged in accordance with the SPDES permit in place for the facility, which allows for treatment and discharge of remediation wastewaters.
- Visual inspection for clean surfaces.
- Wipe sampling (one sample per four bays, depending on configuration) to confirm attainment of the $<10 \ \mu g/100 \ cm^2$ surface PCB cleanup criterion.
- Additional pressure washing as needed to attain the visually clean standard or PCB surface cleanup criterion.

The Phase 2 IRM work plans also called for surface cleaning for floors in the vicinity of injection molder series 300, 400 and 500 (Bays F3-F9, G3-G5, H3-H12 and J4-J12) in accordance with TSCA regulations in 40 CFR 761.30(p). As required by these regulations the double wash rinse procedure followed by a 24-hour drying period and covering of the surfaces to prevent release of PCBs with two solvent resistant and water repellant coatings of contrasting colors was implemented in these areas. Also as required by these regulations a sign was placed in the area to indicate the presence of PCBs.

For Bays F-G/13-19 a combination of surface cleaning and decontamination for reuse in accordance with TSCA was performed. The areas addressed during the Phase 2 IRM are depicted on Figures 1-3 and 1-4.

Other activities conducted as part of the Phase 2 IRM include:

- Decommissioning of the oil reclamation system in the IWTP including draining, flushing and cleaning of the oil reclamation system piping and equipment.
- Draining, cleaning and removal of oil reclamation storage tanks.
- Deactivation of the emulsion system and equipment located in the IWTP.
- Draining, cleaning and dismantling of the 275-gallon diesel fuel tank from the former fire house pump.
- Draining, cleaning and dismantling of the three aboveground sludge storage tanks, outside the manufacturing building, associated with the paint storage room.
- Cleaning and disposing of the fly ash hopper and support structure located south of the powerhouse.
- Removal and containerization of paint sludge located on the roof of the manufacturing building.
- Demolition of mezzanines in Bays G, H and K.
- Dismantling of cooling water piping along column H.

The following sampling procedure was identified for dismantled piping and equipment (Hesler 1999):

• For PCB-related equipment (equipment and piping that potentially conveyed and/or contained PCB contaminated material), the first three roll-off containers of equipment required internal sampling (wipe tests for PCBs) of three different pieces in three different areas

(for pipe, one sample on each end and one midlength) and one external sample from any piece of equipment. Upon the wipe tests meeting the criterion of $<100 \ \mu g/100 \ cm^2$, the remaining roll-off containers which contained PCB-related equipment required three internal samples taken from one piece of PCB-related equipment and one external sample from any piece.

• Roll-off containers containing non-PCB related equipment required one external wipe sample from any piece of equipment.

Asbestos abatement activities performed at the site are not included in this report consistent with a letter from the NYSDEC dated December 22, 1998 (Benjamin, 1998) stating that asbestos abatement procedures are addressed by regulatory programs other than those enforced by the NYSDEC.

2. IRM implementation

2.1. Remaining Phase 1 IRM

2.1.1. Floor surfaces

Floor surface cleaning work in Bays A1 through A4 was completed between November 1999 and March 2000 in accordance with the Phase 1 IRM Work Plan. Verification sampling of the floor surfaces during the implementation of the Phase 1 IRM was completed in March 2000 in accordance with the O'Brien and Gere Engineers May 1999 Sampling and Analysis Plan (O'Brien & Gere 1999). If a surface failed a visual inspection, the contractor was required to reclean the surface. Following attainment of the visually clean standard, verification floor wipe samples were collected at a frequency of one sample per four decontaminated bays. Wipe samples were analyzed for PCBs using USEPA Method 8082. Quality control field blank samples were collected at a frequency of one per twenty environmental wipe samples.

Floors in Bays A1 through A4 did not attain the cleanup criterion of <10 μ g/100 cm² and were subsequently re-washed. Floors in this bay grouping did not attain the criterion after three washings. The floors in these bays were coated and marked in accordance with 40 CFR 761.30 (p). Floor coating was completed in May 2000. The floor coating methodology is described in Section 2.2.2. A sign depicting the area encapsulated, as well as the required TSCA PCB mark was placed on the floor, in accordance with 40 CFR 761.30(p).

Figure 1-3 depicts the sample locations and areas cleaned as part of the Remaining Phase 1 IRM. Table 2-1 contains a summary of verification wipe sample data. Laboratory analytical data reports for the verification sampling were submitted to NYSDEC on a monthly basis.

2.1.3. Pipe removal/decontamination

Piping remaining to be removed for the Phase 1 IRM included the glycol piping. As part of the Phase 1 IRM, draining, powerwashing, and dismantling of glycol piping was to be performed. The glycol piping was drained in August 1999. Since this piping is still useful it has not

been dismantled and is not planned to be dismantled. Figure 1-5 shows the location of the glycol piping.

2.1.4. Miscellaneous cleaning tasks

Other remaining Phase 1 IRM tasks discussed in Section 1.5.1 were completed between June and December 2000 in accordance with the Phase 1 IRM Work Plan. This work included:

- Removal and containerization of residuals from the paint room sump and emulsion sump (completed in December 2000), closure of the emulsion sump by filling with concrete (January 2001), and closure of the paint room sump by filling with approved fill and concrete (completed in July 2001). Figure 2-1 depicts the locations of the emulsion and paint room sumps.
- Draining and powerwashing of the piping and pre-heater associated with boiler #4 and the remaining powerhouse boiler piping (completed in June 2000).
- Removal and containerization of sludges, and powerwashing of the mold storage building sumps (completed in September 1999), and closure of the mold storage building sumps by filling with concrete (completed in September 1999). Figure 2-2 shows the location of the mold storage building sumps. The floor of the mold storage building was cleaned and sampled in April 2000.
- Draining, powerwashing, and dismantling of process piping in the mold storage building and between the mold storage building and the manufacturing building (completed between June 2000 and July 2000). The piping that was removed was located in the trestle shown on Figure 2-2.

2.2. Phase 2 IRM

2.2.1. Floor surface cleaning

Floor surface cleaning in the bays identified in Section 1.5.2 was completed between January 2000 and January 2001, in accordance with the Phase 2 IRM Work Plan. Verification sampling was conducted between January 2000 and January 2001, in accordance with the O'Brien and Gere Engineers May 1999 Sampling and Analysis Plan (O'Brien & Gere, 1999). If a surface failed a visual inspection, the contractor was required to re-clean the surface. Following attainment of the visually clean standard, verification floor wipe samples were collected at a frequency of one sample per four decontaminated bays. Wipe samples were analyzed for PCBs using USEPA Method 8082. Quality control field blank samples were collected at a frequency of one per twenty environmental wipe samples.

Areas that did not attain the cleanup criterion of 10 μ g/100 cm² were rewashed until subsequent verification wipe samples indicated that the cleanup criterion was achieved. For Bays E2-E8, F2, F10-F19; G2; G6-G19, H13A, and J3-J13A the floor surface did not attain the criterion after two washings. These bays were decontaminated for reuse in accordance with 40 CFR Part 761.30(p) regulations in November 2000, as described in Section 2.2.2.

Figure 1-3 depicts the sample locations and areas where surfaces were cleaned during the Phase 2 IRM. Figure 1-3 also depicts the areas where floors were decontaminated for reuse in accordance with TSCA. Table 2-1 contains a summary of verification wipe sample data. Laboratory analytical data reports were submitted to NYSDEC on a monthly basis for the verification sampling.

2.2.2. Floor decontamination for reuse

The floors in Bays F3-F9, G3-G5, H3-H12, F3-F12, G3-G5, H3-H12, and J4-J12 were decontaminated for reuse in accordance with 40 CFR 761.30(p), as described in the September 28, 1999 letter to Ms. Susan Benjamin from James Hartnett. In addition, as discussed above, Bays E2-E8, F2, F10-F19, G2, G6-G19, H13A, and J3-J13A were also decontaminated in accordance with TSCA regulations in 40 CFR 761.30 (p), as the cleanup criterion of <10 μ g/100 cm² was not attained in these bays following multiple cleaning attempts.

The decontamination process involved application of a double wash and double rinse procedure to accessible surfaces, 24-hour drying, and coating of the surface to prevent release of PCBs with two solvent and water repellant coatings of contrasting colors. The coatings applied were Shelby Epoxy Coatings in contrasting shades of grey. Specifically, the Shelby 700 Series Coating was applied as the primer, and the 400 Series Coating was applied as the top coat. Shelby Epoxy Coating product information was submitted to NYSDEC by GM in a letter dated August 8, 2000 (Hartnett 2000b).

The floor coating was completed April, 2001. Since April 2001, certain areas of the floors in Bays E3 to E8, F2 to F16, G3 to G9, G13, G14, G16, G18, G19, H3, H4, and J3 to J12 required resurfacing. As of April 5, 2002, resurfacing has been completed in Bays H5 to H13 in preparation for tenant occupancy. Signs depicting the areas coated as well as the required TSCA PCB mark, were developed for placement on walls or floors in the vicinity of the encapsulated areas. Additional signs will be developed throughout the encapsulated area once tenants are identified for this area. Figure 1-3 depicts the floor area that was decontaminated for reuse in accordance with 40 CFR 761.30(p).

2.2.3. Aboveground surface cleaning

The overhead steel cleaning of the bays associated with the Phase 2 IRM was completed in January 2001, using the procedures described in the Phase 2 IRM Work Plan. Verification sampling of the overhead steel was conducted between January 2000 and January 2001, in accordance with the May 1999 Sampling and Analysis Plan (O'Brien & Gere 1999). The collected wipe samples were analyzed for PCBs using USEPA Method 8082, and confirmed attainment of the <10 μ g/100 cm² criterion.

Some areas requiring overhead cleaning were congested with electrical wiring, air ducts and piping, limiting accessibility for the cleaning crews. Specifically, due to safety concerns related to electrical equipment, certain areas in Bays D6, D7, D8, D10, and D11 were not accessible, and thus cleaning of overhead surfaces was not performed in these areas. These areas are noted on Figure 1-4. In Bays K3 – 12, the presence of piping and ductwork made cleaning efforts difficult, however accessible surfaces were cleaned and found to meet the cleanup criterion of < 10 μ g/100cm².

The sample locations are indicated on Figure 1-4, and the sample data are presented in Table 2-1. Laboratory analytical data for the verification sampling were submitted to NYSDEC on a monthly basis.

2.2.4. IWTP oil reclamation system

The oil reclamation system located in the IWTP was decommissioned. This system consisted of an absolute filter, two recycle filters, two oil filters, two oil reclaimers, several pumps, a sump, process piping and fittings, and other associated equipment. Piping and equipment associated with this system was drained, flushed, cleaned and dismantled. The locations of equipment and piping removed during this effort are depicted on Figure 2-3.

The oil reclamation storage tanks were deactivated in November 2000. The oil reclamation system consisted of two 5,000 gallon oil reclamation tanks, one 10,000 gallon oil reclamation tank, one 5,000 gallon waste oil tank, pump stations, sump, stairs, and associated piping, as shown on Figure 2-4. Each of the aforementioned tanks, which were located in the containment area of the IWTP, were drained, cleaned and removed. Piping shown on Figure 2-4 was drained, flushed and dismantled as described in Section 1.5.2. The base plate for the IWTP basement and oil storage containment area was removed. Piping between these areas was drained, flushed, cleaned, and dismantled. Verification sampling of the equipment and piping was completed in April 2001.

Approximately 165 gallons of oil were removed during the cleaning activities. The oil was characterized and shipped off-site for disposal as TSCA waste in February 2000.

The floor of the containment area was pressure washed and verification samples confirming the area was cleaned to the cleanup criterion of $< 10 \ \mu g/100 \text{cm}^2$ were collected in December 2000.

2.2.5. Emulsion system, diesel fuel and sludge storage tanks

The emulsion system and associated equipment including the emulsion storage tank and mix tank located in the basement of the IWTP, were dismantled. Approximately 2,805 gallons of emulsion oil were removed from the tanks and shipped off-site for disposal on October 5, 2000. Piping and equipment associated with the system as depicted on Figure 2-3, were drained, cleaned, flushed, and dismantled. Sludge from the emulsion system was collected and shipped off-site in December 2000. The emulsion system was dismantled in February 2001.

The 275-gallon diesel fuel tank from the former fire house pump was drained, flushed, cleaned and dismantled prior to March 22, 2000. It is O'Brien & Gere's understanding that the tank and associated equipment has been scraped and disposed of appropriately.

The four aboveground stainless steel sludge storage tanks, outside the manufacturing building associated with the paint storage room, were drained, cleaned and dismantled in June 2000. The tanks were cleaned to a visually clean appearance. Materials removed from the tanks were mostly water, and were thus discharged to the IWTP clarifiers for treatment.

2.2.6. Fly ash hopper

The fly ash hopper and support structure, located south of the powerhouse, were cleaned to a visually clean standard and dismantled in January 2001. Remaining ash in the hopper and ancillary piping and equipment (including dried buildup) was removed, containerized, characterized, and shipped off-site for disposal in accordance with appropriate local, state, and federal regulations between November 2000 and December 2000. Related duct, piping, and ancillary equipment was cleaned as shown on Figure 2-5. The fly ash hopper was demolished between November 2000 and January 2001. Brick debris generated was staged for reuse on-site, following NYDEC approval (Benjamin 2001e).

2.2.7. Miscellaneous cleaning and demolition tasks

Paint sludge located on the roof of the manufacturing building, above the paint room, was removed, containerized, and characterized for disposal on November 17, 2000. Based on characterization data, the paint sludge was disposed off-site as TSCA waste.

The mezzanines in Bays G3-5, H4-13A, and K3-K13 were demolished in accordance with the work plan for additional Phase 2 tasks submitted to NYDEC on March 2, 2001 and approved by NYDEC on March 21, 2001. In addition, as provided in these letters, cooling tower piping located along the H Bay column line Bays H3-8 was dismantled. The mezzanines were demolished between March 2001 and April 2001 and the piping was dismantled in July 2001.

Cleaning

3. Material management

3.1. Cleaning water

Cleaning waters generated during the remaining Phase 1 IRM and Phase 2 IRM were collected using vacuum equipment and transferred to the onsite IWTP for treatment. Solids contained in the construction waters were allowed to settle out in an IWTP clarifier before further water treatment. These solids will be removed, stabilized and disposed off site as part of the IWTP decommissioning. Manifest documentation is presented as Exhibit A.

3.2. Piping and equipment

Decontaminated piping and equipment generated during the remaining Phase 1 IRM and Phase 2 IRM were collected in roll-offs on-site. Piping equipment that was used in a PCB-related process was segregated from other piping/equipment. Following verification of attainment of the 100 μ g/100 cm² criterion, roll-offs containing piping/equipment were transported off-site to be recycled. Manifest documentation is presented as Exhibit A.

3.3. Pipe/equipment and sump/trench contents

Residuals generated from draining of process equipment and removal of materials from sumps, as well as sludge generated from the piping/equipment decontamination process, were segregated by waste stream and containerized in 55-gallon drums. Each type of material was characterized for disposal based on disposal facility requirements, profiled for disposal, and disposed of in accordance with applicable regulations. A summary of materials generated for disposal during the remaining Phase 1 and Phase 2 IRMs is presented in Table 3-1. A summary of disposal characterization data is presented in Table 3-2. Manifest documentation is presented as Exhibit A.

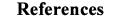
3.4. Miscellaneous wastes

Contents of the fly ash hopper, paint sludge removed from the manufacturing building roof, and other roof debris removed from the manufacturing building roof were transported by railcar in November and December 2000, for off-site disposal as non-hazardous waste. Details regarding disposal of these materials are contained in Table 3-1. A summary of disposal characterization data is presented in Table 3-2. Manifest documentation is presented as Exhibit A.

Cleaning

4. Engineer's certification

The on-site observation of the remaining Phase 1 and Phase 2 IRM work was performed under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, I hereby certify that, with the exception of the dismantling of the glycol piping and the resurfacing of certain areas of floors as described in Section 2.2.2, and certain inaccessible areas as described in Section 2.2.3, the remaining Phase 1 and Phase 2 IRM work has been completed in accordance with the Phase 1 IRM Work Plan, the Phase 2 IRM Work Plan, the Order, applicable statutes and regulations, and generally accepted technical and scientific principles.



- Benjamin, 1998. Letter to James Hartnett of GM from Susan Benjamin approving 1998 GM Bid Documents and Cleaning Specifications. December 22, 1998.
- Benjamin, 1999a. Letter to James Hartnett of GM Susan Benjamin of NYSDEC approving April 30, 1999 cleaning approach letter. May 13, 1999.
- Benjamin, 1999b. Letter to James Hartnett of GM Susan Benjamin of NYSDEC approving work plans submitted in May 13, 1999 and amended in letter of May 18, 1999 from James Hartnett. May 28, 1999.
- Benjamin, 1999c. Letter to James Hartnett of GM Susan Benjamin of NYSDEC approving Phase 1 IRM based on clarifications in June 15, 1999 letter from James Hartnett. June 17, 1999.
- Benjamin, 1999d. Letter to James Hartnett of GM from Susan Benjamin of NYSDEC approving GM's July 6, 1999 letter regarding the characterization plan for the facility cleaning in injection molder areas.
- Benjamin, 1999e. Letter to James Hartnett of GM from Susan Benjamin of NYSDEC approving initial Phase 2 IRM scope defined in GM's August 5, 1999 letter. August 11, 1999.
- Benjamin, 1999f. Letter to James Hartnett of GM from Susan Benjamin of NYSDEC approving Phase 2 IRM scope provided in the September 28, 1999 letter from James Hartnett. October 19, 1999.
- Benjamin, 1999g. Letter to James Hartnett of GM from Susan Benjamin of NYSDEC approving cleaning of floors described in the November 5, 1999 letter from James Hartnett. November 15, 1999.
- Benjamin, 2000a. Letter to James Hartnett of GM from Susan Benjamin of NYSDEC approving March 2000 Phase 1 Initial Phase 2 Engineering Report. July 28, 2000.
- Benjamin, 2000b. Letter to James Hartnett of GM from Susan Benjamin of NYSDEC approving floor coating procedures. September 12, 2000.

- Benjamin, 2001a. Letter to James Hartnett of GM from Susan Benjamin of NYSDEC approving Phase 1 initial Phase 2 Cleaning IRM report. July 28, 2001.
- Benjamin, 2001c. Letter to James Hartnett of GM from Susan Benjamin of NYSDEC approving certification of completion of Phase 2 IRM activities in future HMQ Metal Finishing, LLC. tenant space. April 30, 2001.
- Benjamin, 2001d. Letter to James Hartnett of GM from Susan Benjamin of NYSDEC approving additional scope for Phase 2 Facility Cleaning IRM. March 21, 2001.
- Benjamin, 2001e. Letter to James Hartnett of GM from Susan Benjamin of NYSDEC approving use as on-site fill for debris generated from the demolition of the fly ash silo.
- GM, 1998. Bid Documents and Cleaning Specifications, 1998.
- Greenlaw, 2000. Letter to James Hartnett of GM from David Eric Greenlaw of USEPA approving Phase 2 IRM approach. April 4, 2000.
- Hartnett, 1999a. Letter to Susan Benjamin of NYSDEC from James Hartnett of GM proposing surface cleaning approach. April 30, 1999.
- Hartnett, 1999b. Letter to Susan Benjamin of NYSDEC from James Hartnett of GM submitting Royal Environmental Work Plan and O'Brien & Gere Engineers, Inc. Sampling and Analysis Plan. May 5, 1999.
- Hartnett, 1999c. Letter to Susan Benjamin of NYSDEC from James Hartnett of GM discussing revisions to the IRM Plans. May 13, 1999.
- Hartnett, 1999d. Letter to Susan Benjamin of NYSDEC from James Hartnett of GM providing responses to the NYSDEC May 17, 1999 fax. May 18, 1999.
- Hartnett, 1999e. Letter to Donald Hessler of NYSDEC from James Hartnett of GM providing responses to comments in NYSDEC letter dated May 28, 1999. June 15, 1999.
- Hartnett, 1999f. Letter to Susan Benjamin of NYSDEC from James Hartnett of GM proposing Initial Phase 2 IRM work. August 5, 1999.
- Hartnett, 1999g. Letter to Susan Benjamin of NYSDEC from James Hartnett of GM proposing Initial Phase 2 IRM work. August 26, 1999.

- Hartnett 1999h. Letter to Susan Benjamin of NYSDEC from James Hartnett of GM discussing Initial Phase 2 IRM work. September 8, 1999.
- Hartnett, 1999i. Letter to Susan Benjamin of NYSDEC from James Hartnett of GM discussing Initial Phase 2 IRM work. September 28, 1999.
- Hartnett, 1999j. Letter to Susan Benjamin of NYSDEC from James Hartnett of GM discussing floor coating. November 5, 1999.
- Hartnett, 2000a. Letter to Susan Benjamin of NYSDEC from James Hartnett of GM regarding additional Phase 2 Facility Cleaning IRM Task Work Plan (Paint room sump closure). March 2, 2000.
- Hartnett, 2000b. Letter to Susan Benjamin of NYSDEC from James Hartnett of GM regarding Phase 2 Facility Cleaning IRM floor cleaning. August 8, 2000.
- Hartnett, 2001a. Letter to Susan Benjamin of NYSDEC from James Hartnett of GM providing certification for Phase 2 IRM activities in the proposed Mitten Manufacturing lease space. February 20, 2001.
- Hartnett, 2001b. Letter to Susan Benjamin of NYSDEC from James Hartnett of GM providing certification for Phase 2 IRM activities in the proposed HMQ Metal Finishing Group, LLC. lease space. March 29, 2001.
- Hartnett, 2001c. Letter to Susan Benjamin of NYSDEC from James Hartnett of GM regarding additional Phase 2 Facility Cleaning IRM Task Work Plan (Mezzanines and overhead piping). March 2, 2001.
- Hesler, 1999a. Letter to James Hartnett of GM from Donald Hesler of NYSDEC approving Phase 1 IRM plans. May 28, 1999.
- Hesler, 1999b. Letter to James Hartnett of GM from Donald Hesler of NYSDEC approving Phase 1 IRM plans. June 17, 1999.
- O'Brien & Gere, 1999. Cleaning Program Verification Sampling and Analysis Plan. May 1999.
- O'Brien & Gere, 2000. Phase 1 and Initial Phase 2 Facility Cleaning IRM Report. March 2000.
- Royal Environmental, 1999. Cleaning of the Syracuse Facility Work Plan. May 1999.

- Stoller, 1999a. Letter to James Hartnett of GM from Kenneth Stoller of USEPA approving April 30, 1999 cleaning approach letter. May 14, 1999.
- Stoller, 1999b. Letter to James Hartnett of GM from Kenneth Stoller of USEPA approving proposed sampling for PCB contamination of floors to be cleaned during Phase 2 IRM work. July 23, 1999.
- Stoller, 1999c. Letter to James Hartnett of GM from Kenneth Stoller of USEPA approving August 5, 1999 letter proposing Initial Phase 2 IRM work. August 13, 1999.

Table 2-1Former IFG FacilityFacility Cleaning IRMFloor and Aboveground SurfacesVerification Wipe Sample Data

		Surface	Bays or Materials	Detected Aroclor Conc.*	Aroclor
Date	Sample ID	Sampled	Represented by Sample	(ug/100 sq. cm)	Identified
9/8/99	H13-AS1	overhead steel	H13	ND	
9/29/99	F18-W1	walls	F16,F17,F18,F19	ND	
9/29/99	F17-AS1	overhead steel	F16,F17,F18,F19	ND	
10/13/99	B16-AS1	overhead steel	A16,B16,C16,D16	ND	
10/13/99	C16-W1	walls	A16,B16,C16,D16	ND	
10/13/99	C2-AS1	overhead steel		ND	
10/13/99	B2-W1	walis	B2,C2,D2	ND	
10/25/99	C15-AS1	overhead steel	A15,B15,C15,D15	ND	
10/25/99	D15-W1	walls	D15,D14	ND	
10/26/99	G2-W1	walls	E2,F2,G2	ND	
10/26/99	F2-AS1	overhead steel	E2,F2,G2,G3	ND	
11/2/99		overhead steel	H3,J3,K3	ND	1
11/2/99	K3-W1	walls	H3,J3,K3	ND	
11/3/99	B14-AS1	overhead steel	A13,A14,B13,B14	ND	1
11/8/99	C13-AS1	overhead steel	C13,C14,D13,D14	ND	
11/18/99	C12-AS1	overhead steel	B11,B12,C11,C12	ND	
12/9/99	C5-AS1	overhead steel	B5, B6, C5, C6	ND	
12/9/99	B4-AS1	overhead steel	B3, B4, C3, C4	ND	
12/15/99	E6-AS1	overhead steel	D5,D6,E5,E6	ND	
12/15/99	E4-AS1	overhead steel	D3,D4,E3,E4	2	1248
12/21/99	E8-AS1	overhead steel	D7,D8,E7,E8	7.8	1248
12/21/99	E4-AS1	overhead steel	D3,D4,E3,E4	ND	
12/22/99	C15-F1	floor	C15,C16,D15,D16	ND	
12/28/99	D12-AS1	overhead steel	D11, D12, E11, E12	5.3	1248
12/28/99	E10-AS1	overhead steel	D9, D10, E9, E10	ND	
12/28/99	C9-AS1	overhead steel	B9,B10,C9,C10	ND	
12/28/99	B8-AS1	overhead steel	B7, B8, C7, C8	42	
12/29/99	B14-F1	floor	A13,A14,B13,B14	ND	
1/4/00	A10-AS1	overhead steel	A9,A10,A11,A12	ND	
1/7/00	A10-F1	floor	A9,A10,A11,A12	6.1	1248
1/7/00	A11-W1	walls	A9,A10,A11,A12	ND	
1/10/00	A7-F1	floor	A5, A6,A7,A8	7.5	1248
1/11/00	C14-F1	floor	C13,C14,D14	ND	1248
1/12/00	B10-F1	floor	B9,B10,B11,B12	8.8	1248
1/12/00	C8-AS1	overhead steel	B7, B8, C7, C8	30	1248

Table 2-1Former IFG FacilityFacility Cleaning IRMFloor and Aboveground SurfacesVerification Wipe Sample Data

		Surface	Bays or Materials	Detected Aroclor Conc.*	Aroclor Identified
Date	Sample ID	mple ID Sampled Represented by Sample			
1/14/00	C7-AS1	overhead steel	B7, B8, C7, C8	6	1248
1/17/00	C10-F1	floor	C9, C10, C11, C12	6	1248
1/18/00	F4-AS1	overhead steel	F3, F4, G4	28	1248**
1/19/00	B8-F1	floor	B7, B8, C7, C8	5	1248**
1/20/00	C6-F1	floor	B5, B6, C5, C6	ND	
1/20/00	C3-F1	floor	B3, B4, C3, C4	7	1248**
1/21/00	Field Blank-10	blank		ND	
1/21/00	E11-F1	floor	D11, D12, E11, E12	12	1248
1/25/00		floor	D7, D8, E7, E8	23	1248**
1/26/00	D11-F1 (Resample of E11-F1)	floor	D11, D12, E11, E12	14	1248**
1/26/00	D9-F1	floor	D9, D10, E9, E10	17	1248**
1/26/00	E6-F1	floor	D5, D6, E5, E6	27	1248**
1/28/00	A2-F3 (Resample of A2-F2)	floor	A1, A2, A3, A4	27	1248**
2/2/00	D12-F1 (Resample of D11-F1)	floor	D11, D12, E11, E12	ND	
2/2/00	D10-F1 (Resample of D9-F1)	floor	D9, D10, E9, E10	ND	
2/7/00	E7-F1 (Resample of E8-F1)	floor	D7, D8, E7, E8	24	1248**
2/7/00	E5-F1 (Resample of E6-F1)	floor	D5, D6, E5, E6	27	1248**
2/7/00		floor	D3, D4, E3, E4	48	1248**
2/8/00	A2-F4 (Resample of A2-F3)	floor	A1, A2, A3, A4	33	1248**
2/9/00	F4-AS2 (Resample of F4-AS1)	overhead steel	F3, F4, G4	7.4	1248**
2/9/00	G6-AS1	overhead steel	F5, F6, G5, G6	ND	
2/9/00	F8-AS1	overhead steel	F7, F8, G7, G8	5.2	1248**
2/10/00		wall	D7, D8	ND	
2/10/00		wall	D6	ND	
2/10/00		wall	D3	6.3	1248
2/10/00		blank		ND	
2/11/00	G10-AS1	overhead steel	F9, F10, G9, G10	5.8	1248**
2/11/00	F12-AS1	overhead steel	F11, F12, G11, G12 (excluding area over offices)	26	1248
2/11/00		floor	D3, D4	8.3	1248**
2/11/00		floor	D5, D6	15	1248**
2/11/00		floor	D7, D8	9.8	1248**
2/15/00		overhead steel	E12, F13, F14, F15	ND	
2/15/00		floor	D13, E13	8.4	1248**
2/15/00		floor	A1	660	1248**
2/17/00	A1-F2	floor	A1	37	1248**

Table 2-1Former IFG FacilityFacility Cleaning IRMFloor and Aboveground SurfacesVerification Wipe Sample Data

		Surface	Bays or Materials	Detected Aroclor Conc.* (ug/100 sq. cm)	Aroclor Identified
Date	Sample ID				
2/22/00	F10-F1	floor	F9, F10, F11, F12	12	1248**
2/23/00	F11-AS1 (Resample of F12-AS1)	overhead steel	F11, F12, G11, G12 (excluding area over offices)	8.7	1248
2/23/00		floor	G16, G17, G18, G19	110	1248
2/28/00	A3-F1	floor	A3, A4	280	1248**
2/29/00	F11-F1 (Resample of F10-F1)	floor	F9, F10, F11, F12	18	1254**
3/1/00	D5-F1 (Resample of D6-F1)	floor	D5, D6	ND	
3/1/00	Field Blank-12	blank		ND	
3/6/00	F2-F2 (Resample of F2-F1)	floor	E2, F2, G2, H2	31	1248**
3/8/00	H5-AS1	overhead steel	H4, H5, H6	ND	
3/8/00	H4-W1	wall	H3, H4, H5, H6	ND	
3/8/00		overhead steel	H7, H8, H9, H10	17	1248**
3/8/00	H8-W1	wall	H7, H8, H9, H10	ND	
3/16/00	H7-AS1 (Resample of H9-AS1)	overhead steel	H7, H8, H9, H10	ND	
3/20/00	G9-F1	floor	G6, G7, G8, G9	570	1248**
3/27/00	A1-F3	floor	A1	24	1248**
3/27/00		floor	A2, A3, A4	220	1248**
3/27/00		floor	G6, G7, G8	850	1248**
3/27/00		floor	G9, G10, G11	34	1248**
3/27/00		floor	G12, G13, G14, G15	28	1248**
3/27/00	G17-F2 (Resample of G17-F1)	floor	G16, G17, G18, G19	120	1248**
3/30/00	J9-AS1	overhead steel	J7, J8,J9,J10	8.1	1248**
4/6/00	J5-AS1	overhead steel	J4, J5, J6	17	1248
4/12/00		overhead steel	J4, J5, J6	8.6	1248
4/12/00		floor	J10, J11, J12, 1/2 J13	12	1248
4/12/00		blank		ND	
4/13/00		floor	Mold Storage Building	ND	
4/17/00		floor	J6, J7, J8, J9	19	1248
4/27/00		overhead steel	K10, K11, K12	ND	
4/27/00		wall	K9, K10, K11, K12	ND	
5/2/00		floor	K10, K11, K12, 1/2 K13	7.7	1248 **
5/2/00		blank		ND	
5/8/00		overhead steel	A5, A6, A7, A8	ND	
6/8/00		floor	F16, F17, F18, F19	15	1248**
6/8/00	F13-F1	floor	F13, F14, F15	32	1248**
6/27/00	F17-F1 (Resample F18-F1)	floor	F16, F17, F18, F19	18	1248**

Table 2-1Former IFG FacilityFacility Cleaning IRMFloor and Aboveground SurfacesVerification Wipe Sample Data

		Surface	Bays or Materials	Detected Aroclor Conc.*	Aroclor
Date	Sample ID	(ug/100 sq. cm)	Identified		
6/27/00	G17-F3 (Resample G17-F2)	G16, G17, G18, G19	26	1248**	
6/27/00	G18-F1 (Alternate for G17-F3)	120	1248**		
6/27/00	Paint Room Wall***	wall	Paint Room Wall	12	1248**
6/27/00	Paint Room Stack***	steel	Paint Room Stack	35	1248**
6/29/00	G14-F2 (Resample of G14-F1)	floor	G13, G14, G15	60	1248**
7/6/00	J8-F1 (Resample of J7-F1)	floor		25	1248**
7/6/00	J11-F2 (Resample of J11-F1)	floor	J10, J11, J12, half J13	17	1248**
7/6/00	Field Blank - 15	blank		ND	
7/11/00	K4-W1	wall	K3, K4, K5	ND	
7/11/00	K4-AS1	7.8	1248**		
7/11/00	00 K7-AS1 overhead steel K6, K7, K8		32	1248**	
7/11/00	K8-W1			ND	
7/20/00	K8-F1	floor	K6, K7, K8, K9	11	1248**
7/20/00	J4-F1	floor	J3, J4, J5	36	1248**
7/21/00	K5-F1	floor	K3, K4, K5	8.6	1248**
8/2/00	K7-AS2 (resample K7-AS1)	overhead steel	K6, K7, K8	ND	
8/4/00	K7-F1 (Resample K8-F1)	Floor	K6, K7, K8, K9	6.2	1248
8/21/00	Field Blank-16	Blank		ND ND	
11/30/00	E15-AS1	overhead steel	E14, E15, F14, F15	ND	
11/30/00	E14-W1	Wall	E14, E15, F14, F15	ND	
12/5/00			7.7	1248**	
12/5/00	IWTP Tank Pit-F1*** Floor ITWP Oil Tank Pit		5.8	1248	
12/5/00	IWTP Tank Pit-W1***			5.5	1248**
1/9/01	D16-AS1	AS1 overhead steel D14, D15, D16, E16, F16 ND		ND	
1/9/01	E16-W1	Wall	D14, D15, D16, E16, F16	ND	
1/9/01	D16-F1	Floor	D14, D15, D16, E16, F16	20	1248
1/30/01	D16-F2	Floor	D14, D15, D16, E16, F16	ND	

Notes:

* Other Aroclors less than detectable

** Altered Aroclor

*** Sample collected prior to cleaning

ND - Not detected; detection limits 5.0 ug/100 sq cm for each Aroclor.

Table 2-2 Former IFG Facility Facility Cleaning IRM Pipe & Equipment Verification Wipe Sample Data

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		Surface	Materials	Detected Aroclor Conc.*	Aroclor
Date	Sample ID	Sampled	Represented by Sample	(ug/100 sq.cm)	Identified
1/14/00	Metal-15	Roll-Off	30th Roll-off	67	1248**
1/20/00	Metal-16	Roll-Off	33rd Roll-off	ND	
1/21/00	Metal-17	Roll-Off	Roll-off (still on-site)	180	1248
1/26/00	Metal-18	Roll-Off	34th Roll-off	12	1248**
1/27/00	Metal-19 (Resample of Metal-17)	Roll-Off	Roll-off (still on-site)	130	1248
· 2/2/00	Metal-20 (Resample of Metal-19)	Roll-Off	35th Roll-off	13	1248**
2/28/00	Light Fixture-2	Light fixture	36th Roll-off	ND	
4/3/00	IWTP-E-1	Roll-Off	Roll-Off DSR-74	49	1248
4/3/00	IWTP-I-1	Roll-Off	Roll-Off DSR-74	9	1248
4/3/00	IWTP-I-2	Roll-Off	Roll-Off DSR-74	ND	
4/3/00	IWTP-I-3	Roll-Off	Roll-Off DSR-74	ND	
4/3/00	IWTP-I-4	Roll-Off	Roll-Off DSR-74	ND	
4/3/00	IWTP-I-5	Roll-Off	Roll-Off DSR-74	ND	
4/3/00	IWTP-I-6	IWTP-I-6 Roll-Off Roll-Off DSR-74 ND		ND	
4/3/00	IWTP-I-7	Roll-Off	Roll-Off DSR-74 ND		
4/3/00	IWTP-I-8	Roll-Off	Roll-Off DSR-74	6.4	1248
4/3/00	IWTP-I-9	Roll-Off	Roll-Off DSR-74	ND	
4/14/00	IWTP-E-2	Roll-Off	Roll-Off DSR-90	ND	
4/14/00	IWTP-I-10	Roll-Off	Roll-Off DSR 90	ND	
4/14/00	IWTP-I-11	Roll-Off	Roll-Off DSR 90	ND	
4/14/00	IWTP-I-12	Roll-Off	Roll-Off DSR 91	ND	
4/14/00	IWTP-I-13	Roll-Off	Roll-Off DSR 92	ND	
4/14/00	IWTP-I-14	Roll-Off	Roll-Off DSR 93	ND	
4/14/00	IWTP-I-15	Roll-Off	Roll-Off DSR 94	ND	
4/14/00	IWTP-I-16	Roll-Off	Roll-Off DSR 95	ND	
4/14/00	IWTP-I-17	Roll-Off	Roll-Off DSR 96	ND	
4/14/00	IWTP-I-18	Roll-Off	Roll-Off DSR 97	ND	
5/10/00	I-Beam-2	Roll-Off	Roll-Off DSR-90	21	1248 **
5/10/00	I-Beam-3	Roll-Off	Roll-Off DSR-81	9.9	1248
7/31/00	Metal-21	Roll-Off	Roll-Off DSR-81	ND	

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Table 2-2 Former IFG Facility Facility Cleaning IRM Pipe & Equipment Verification Wipe Sample Data

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		Surface	Materials	Detected Aroclor Conc.*	Aroclor
Date	Sample ID	Sampled	Represented by Sample	(ug/100 sq.cm)	Identified
7/31/00	Metal-22	Roll-Off	Roll-Off DSR -4	20	1248
8/2/00	Metal-23	Roll-Off	Roll-Off DSR -87	13	1248**
8/2/00	Metal-24	Roll-Off	Roll-Off DSR-81	11	1248**
8/3/00	Metal-25	Roll-Off	Roll-Off DSR 92	22	1248
8/4/00	Metal-26	Roll-Off	Roll-Off DSR-84	45	1248
8/7/00	Metal-27	Roll-Off	Roll-Off DSR-81	8.8	1248
8/10/00	Metal-28	Roll-Off	Roll-Off DSR-62	7.8	1248**
8/15/00	Metal-29	Roll-Off	Roll-Off DSR-62	ND	
8/17/00	Metal-30	Roll-Off	Roll-Off DSR-75	ND	
8/21/00	Metal-31	Roll-Off	Roll-Off DSR 76	ND	
8/21/00	Metal-32	Roll-Off	Roll-Off DSR-62	15	1248
11/8/00	IWTP Oil Tank - 1	Roll-Off	Roll-Off DSR-92	37	1248
11/8/00	IWTP Oil Tank - 2	Roll-Off	Roll-OffDSR-95	350	1248
11/29/00	IWTP Oil Tank - 3	Roll-Off	Roll-OffDSR-95	ND	
11/29/00	IWTP Oil Tank - 4	Roll-Off	Roll-Off DSR-62	ND	

Notes:

* Other Aroclors less than detectable

** Altered Aroclor

ND - Not detected; detection limits 5.0 ug/100 sq. cm for each Aroclor.

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Table 3-1GM Syracuse - Facility Cleaning ProgramRemaining Phase 1 and Phase 2 IRM - Material Characterization/Disposal

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Material	Container	Quantity	Characterization required	Characterization status	Results	Profile Status
		PCB wipe samples	In Progress	Roll-offs generated to date – non-TSCA	NA	
Oil Transfer Station Sludge	Drums Accumulation start date: 3/27/00 90 day limit: 6/25/00	2 drums	1 representative sample – PCBs, RCRA characteristics*	Sampled 2/18/99	TSCA waste B007 (PCBs 13 mg/kg) RCRA haz: D008 (Lead 7.2 mg/kg)	Approved profile AP2330005. Picked up for disposal 6/21/00.
Pipe cleaning decon sludge (paint chips and soil)	Drums Accumulation start date: 4/3/00 90 day limit: 7/2/00	5 drums	l representative sample – VOCs, PCBs, RCRA characteristics*	Sampled 3/09/00	TSCA waste/B007 haz waste (PCBs 100 mg/kg) RCRA non-haz (characteristic)	Dewatered and placed in TSCA roll-off (GB92- 0408) 6/15/00.
Emulsion Tank #1 contents A	In tank	~1400 gal	1 representative sample – VOCs, PCBs, RCRA characteristics*	Sampled 2/18/00	Non-TSCA (PCBs- ND) RCRA non-haz (characteristic)	Contents treated at IWT plant.
Emulsion Tank #1 contents B	In tank; shipped off-site in vac- tanker.	~1000 gal	1 representative sample – VOCs, PCBs, RCRA characteristics*	Sampled 3/28/00	Non-TSCA (PCBs-ND) RCRA haz: D010 (selenium 2.2 mg/L)	Approved profile WPS55630. Picked up by Ross Incineration for disposal on 10/5/00.
Emulsion Tank #2 contents	In tank; shipped off-site in vac- tanker	~2000 gal	1 representative sample – VOCs, PCBs, RCRA characteristics*	Sampled 2/18/00	Non-TSCA (PCBs-ND) RCRA haz: D039 (total tetrachloroethene 84 mg/kg)	Approved profile WPS55630. Picked up by Ross Incineration for disposal 10/5/00.
Emulsion Tank Sludge	Drums Accumulation state date: 10/18/00 90-day limit: 1/16/01	2 drums	None required; used data obtained from Emulsion tank #1 and #2 contents	Sampled 2/18/00 and 3/28/00	Non-TSCA (PCBs ND) RCRA haz D010 (selenium 2.2 mg/L) and D039 (tetrachloroethene 47 mg/kg)	Approved profile AP2330023. Picked up for disposal 12/13/00.

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Table 3-1GM Syracuse - Facility Cleaning ProgramRemaining Phase 1 and Phase 2 IRM - Material Characterization/Disposal

Material	Container	Quantity	Characterization required	Characterization status	Results	Profile Status
Fuel Oil	Drums	1 drum	1 representative sample – PCBs, RCRA characteristics*	Sampled 4/6/00	Non-TSCA (PCBs ND) RCRA-non-haz (characteristic)	Approved profile AP2329928. Picked up for disposal 7/26/00
Trench Fly Ash	Drums	l drum	1 representative sample – PCBs, RCRA characteristics*	Sampled 10/25/99	Non-TSCA (PCBs 1.7 mg/kg) RCRA non-haz (characteristic)	Approved profile LM99- 0766. Picked up for disposal 5/16/00.
Roof paint sludge	Pile; placed in railcar	~ 4 cy	1 representative sample – PCBs, RCRA characteristics*	Sampled 5/22/00	Non-TSCA (PCBs 0.60 mg/kg) RCRA non-haz (characteristic)	Approved profile 982520- 1025. Shipped off-site 11/17/00.
Boiler #4 Pipe Waste	Drum Accumulation start date: 7/12/00 90-day limit: 10/10/00	l drum	1 representative sample – PCBs, RCRA characteristics	Sampled 6/26/00	Non-TSCA (PCBs 0.94 mg/kg) RCRA-haz: D018 (Benzene 27 mg/kg)	Approved profile AP2330017. Picked up for disposal 9/19/00.
Fiberglass piping (Mold Storage Building)	Boxes	3 cy boxes	None	Could not obtain samples. Disposed as haz. Piping historically contained TCE, cyanide, chrome solution and sulfuric acid	NA	Approved profile LM00- 0743. Picked up for disposal 12/13/00.
Hopper fly ash	In hopper; placed in railcars.	~ 46cy	None required; used trench fly ash data.	Sampled 10/25/99	Non-TSCA (PCBs 1.7 mg/kg) RCRA non-haz (characteristic)	Approved profile 982520- 1026. One railcar shipped off-site 11/17/00. Second railcar shipped off-site 12/22/00 (partially filled with fly ash).

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Table 3-1 GM Syracuse - Facility Cleaning Program Remaining Phase 1 and Phase 2 IRM - Material Characterization/Disposal

Material	Container	Quantity	Characterization required	Characterization status	Results	Profile Status
IWTP Oil	Drums	27 drums	1 representative sample – PCBs, RCRA characteristics*	Sampled 10/25/99, 3/28/00	TSCA waste/B001 haz (PCBs 2400 mg/kg, PCBs 2200 mg/kg) RCRA non-haz (characteristic)	Approved profile AP2219334. 3 drums picked up for disposal 2/16/00. 8 drums picked up for disposal 6/21/00. 8 drums picked up for disposal 7/26/00. 4 drums picked up for disposal 8/16/00. 4 drums picked up for disposal 1/25/01.
IWTP Oil Pit Debris	Drums Accumulation start date: 4/24/01 90-day limit: 6/13/01	l drum	l representative sample – PCBs, RCRA characteristics*	Sampled 1/5/01	TSCA waste/B007 haz (PCBs 28 mg/kg) RCRA non-haz (characteristic)	Approved Profile CS 9430. Picked up for disposal by Waste Management on 4/25/01.
Paint Room Sump Debris	Drums	3 drums	1 representative sample – PCBs, RCRA characteristics*	Sampled 1/5/01	Non-TSCA (PCBs 7.9 mg.kg) RCRA non-haz (characteristic)	Approved profile CS 9431 Picked up for disposal by Management on 4/25/01.

* excluding TCLP pesticides/herbicides

N/A- Not Applicable

Table 3-1GM Syracuse - Facility Cleaning ProgramRemaining Phase 1 and Phase 2 IRM - Material Characterization/Disposal

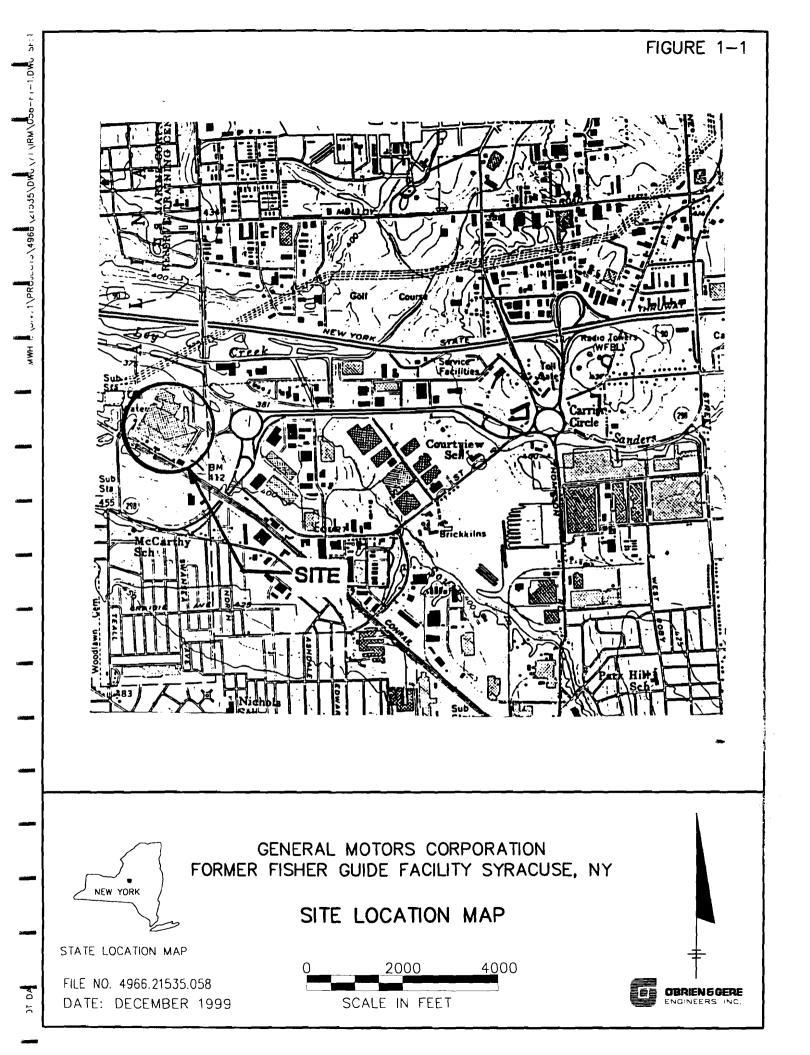
TSCA Rolloff status Profile GB-92-0408 (unless otherwise noted)

Roll-off ID	Size	Accumulation start date	90-day limit	Pick-up date
UPCU 410775	23 cy	1/19/00	4/17/00	3/1/00
UPCU 410370	23 cy	1/12/00	4/10/00	3/1/00
UPCU 410656	23 cy	4/6/00	7/6/00	4/17/00
UPCU 410613	23 cy	3/7/00	6/5/00	4/5/00
UPCU 410333	23 cy	5/11/00	8/9/00	7/28/00
UPCU 411055	30 cy	7/31/00	10/29/00	10/11/00
UPCU 410301	23 cy	10/5/00	1/4/01	10/05/00
UPCU 410862	23 cy	10/11/00	1/10/01	11/17/00
UPCU 411700	23 cy	11/17/00	2/15/00	12/1/00
UPCU 410419	23 cy	12/1/00	3/1/01	2/19/01
(Profile GB-01-0001)]		l	

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	% Total	Solida	70.2	¥	¥	¥	66.1	¥	₹2	e z	6.06	¥.	78	72.5
- Maria	Flashpoint	(Celcius) >60	1	09^	×60	99 ^	AN	<u>8</u>	09	09 ^	AN N	09	¥	¥
	Ha	(STD units) 3.8	7.5	1.1	5.9	9 9	7.5	ž	м М		5.7	e vi	79	2.4
	Total Releasable	HCN (mg/Kg) ND	ł	9	Ð	ę	Ð	£	2	Ê	Q	£	QN	Q
Xeeper	v Total Releasable	-	P	9	R	9	50	9	8	9	QN	2	Q	QN
-	Ignitability		+	ž	¥.	¥	NBR	ž	AN 88	≨ 	4.8 NBR	£	NBR NBR	NBR
-		Metals (mg/L) Barium 25	Lead 1 3.5	Bantum 7.7 Lead 7.2	Ð	Bartum 1.3	ą	Barium 36 Cadmium 0.71 Lead 4.2 Selenium 2.2	Banium 36 Cadmium 0.59 Lead 3.3 Mercury 0.061		Barium 4.	Bartum 2.9 Bartum 2.9 Controntum 0.25 Lead 3 Stver 7	Banum 0.62 Mercury 0.000	Barium 0.91 Mercury 0.0004
	TCLP	SVOCs" (mg/L) ND	Q	AN	QN	¥Z	QN	AN A	AN	ž	QN	ž	Q	Q.
Table Former 165 Factivy Factifity Cleaning IRM Disposal Characterization Data		VOCS* (mg/L) ND	Q	47 2	Tetrachloroethene 0.47	ź	QN	ž	AN N	ž	9	ž	<u>Q</u>	Q.
Former IFG Former IFG Facility Clea		Metals* (mg/kg) NA	AA	¥	¥2	ž	NA	ž		ž	¥	ž	AN	¥z
	Total	SVOCs* (ug/kg) NA	NA	9	AN	Ŋ	NA	2	<u> </u>	40000 24000 Materia 400000 240000 240000 240000 2100000 Prenanthrete 2100000 Prenanthrete 250000 920000 4100000 450000 1500000 1500000	ĀN	Q	AA	¥
		VOCs* (ug/Kg) NA		1,1,1,1,1,1,1,1,1,1,1,1,1,1,1,1,1,1,1,	AN	Toluene 55000 Tetrahorethene 55000 Tetrahorethene 34000 Tetrahorethene 84000 Tetrahorethene 84000 Xytene (rota) 22000 1.3.5 Trimethythenzene 60000 1.3.5 Trimethythenzene 60000 1.3.5 Trimethythenzene 60000 1.2.4 Trimethythenzene 63000 Plagopytiloutene 53000 Plagopytiloutene 22000	[]	15000 17000 17000 16000 16000 16000 16000 16000				Benzere 2000 Elenzere 27000 Elyubenzere 380000 Elyubenzere 320000 Syperopybenzere 230000 Poppopybenzere 280000 I-Propybenzere 280000 I-S Trimethybenzere 200000 I-S Frimethybenzere 200000 Secoprophilouene 10000 Pisoprophilouene 100000		Ę
	Total	PCBs (mg/Kg)* 2400	1.7 - Arocior 1254		Ð		<u>1</u> 00		_	8	0.6 Aroctor 1254			2.9
10 110¹¹¹	Sample	Date 10/25/99	10/25/99	2/18/00	2/18/00	2/18/00	3/9/00	3/28/00	3/28/00	4/8/00	5/22/00	6/26/00	1/5/01	1/5/01
	Material	WTP Tank Oil	Trench Fly Ash	Oil Transfer Station Sludge	Emulsion Tarik #1 Contents A	Emulsion Tank #2	Pipe Cleaning Decon Sludge	Emulsion Tent #1 Contents B**	IWTP Waste Oil #		Roof Paint Studge	Boiter No. 4 Pipe Wasto	IWTP Oil Pit Debris	Paint Room Sump

O'Brien Gere Engineers, inc. t:/DIV71/PROJECTSW966130472\Table 3-2.xls



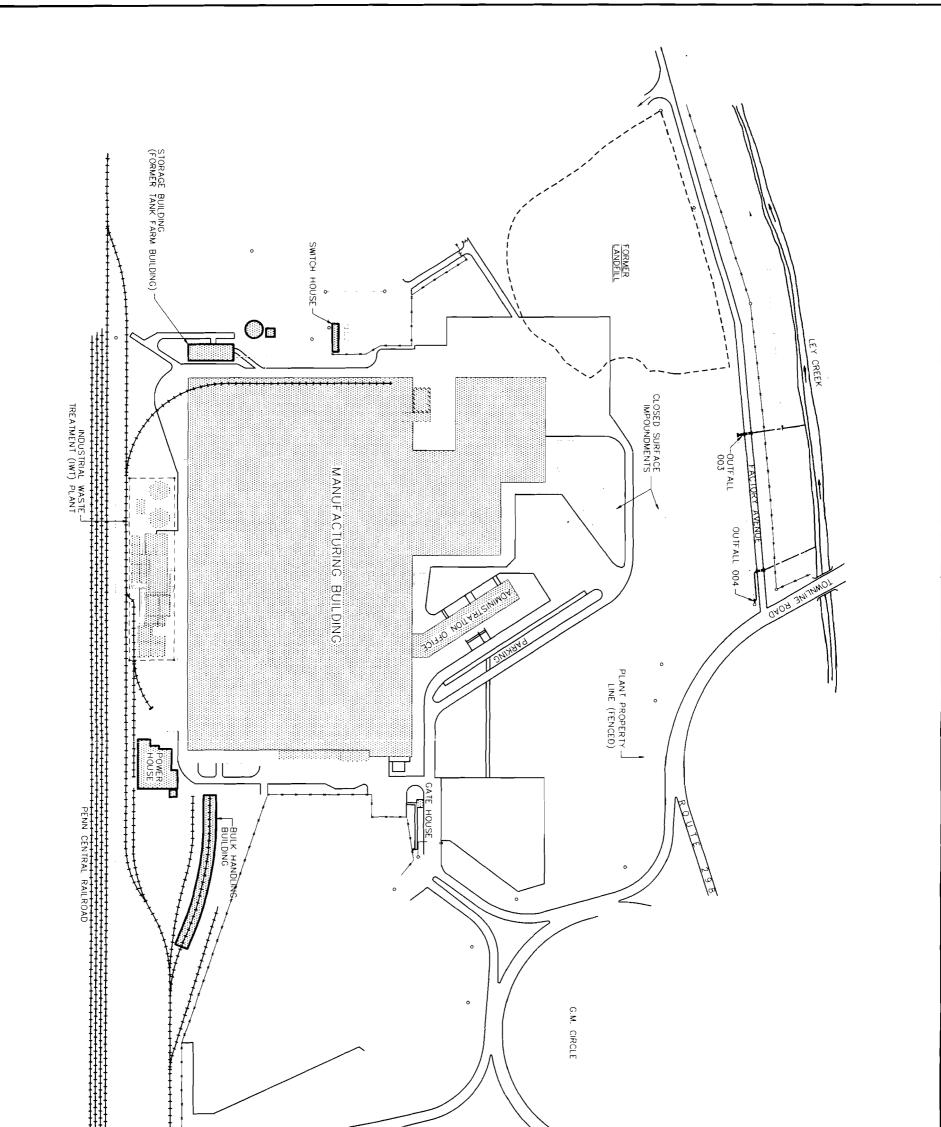


FIGURE 1-2





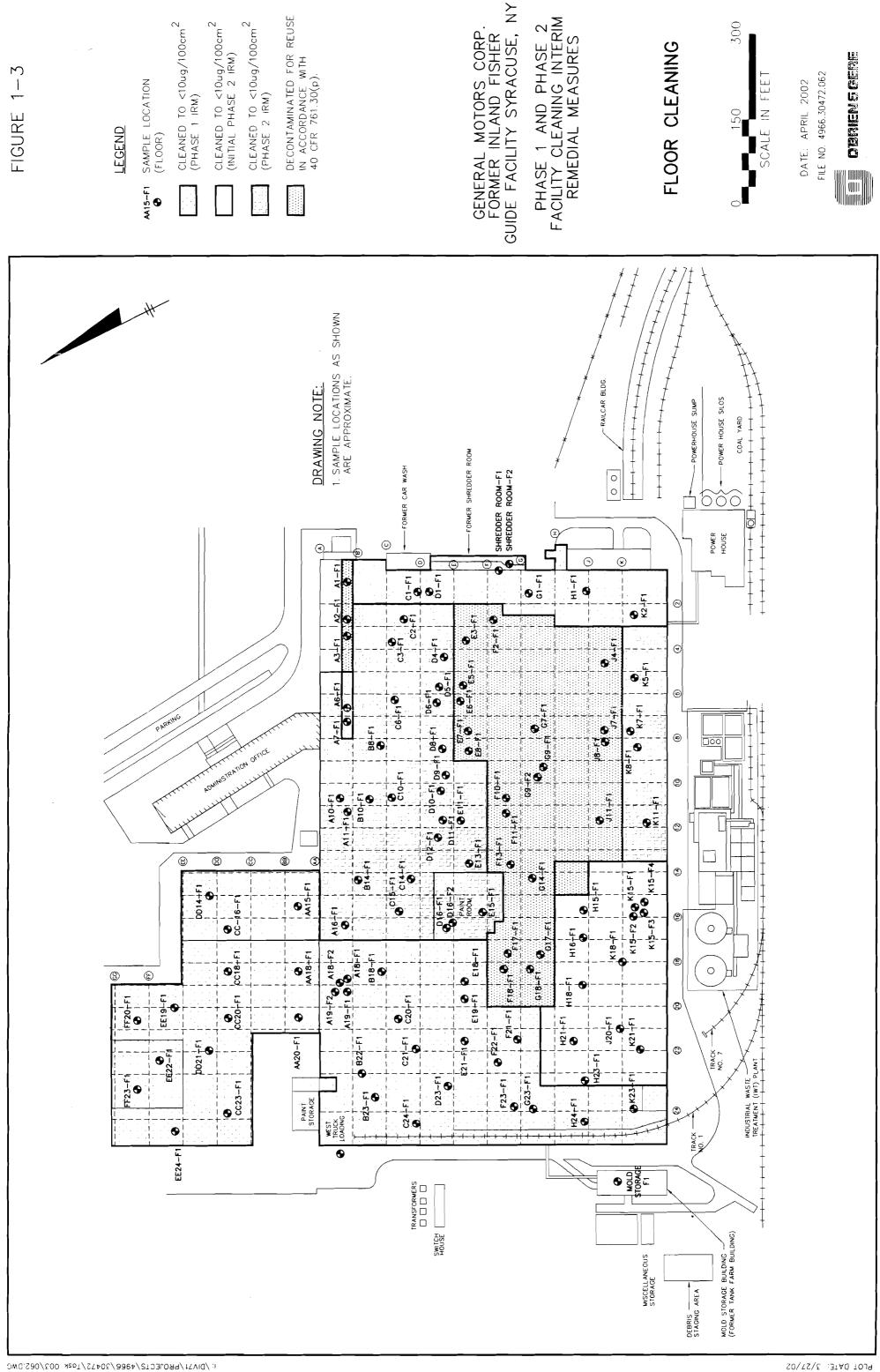
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NOT TO SCALE

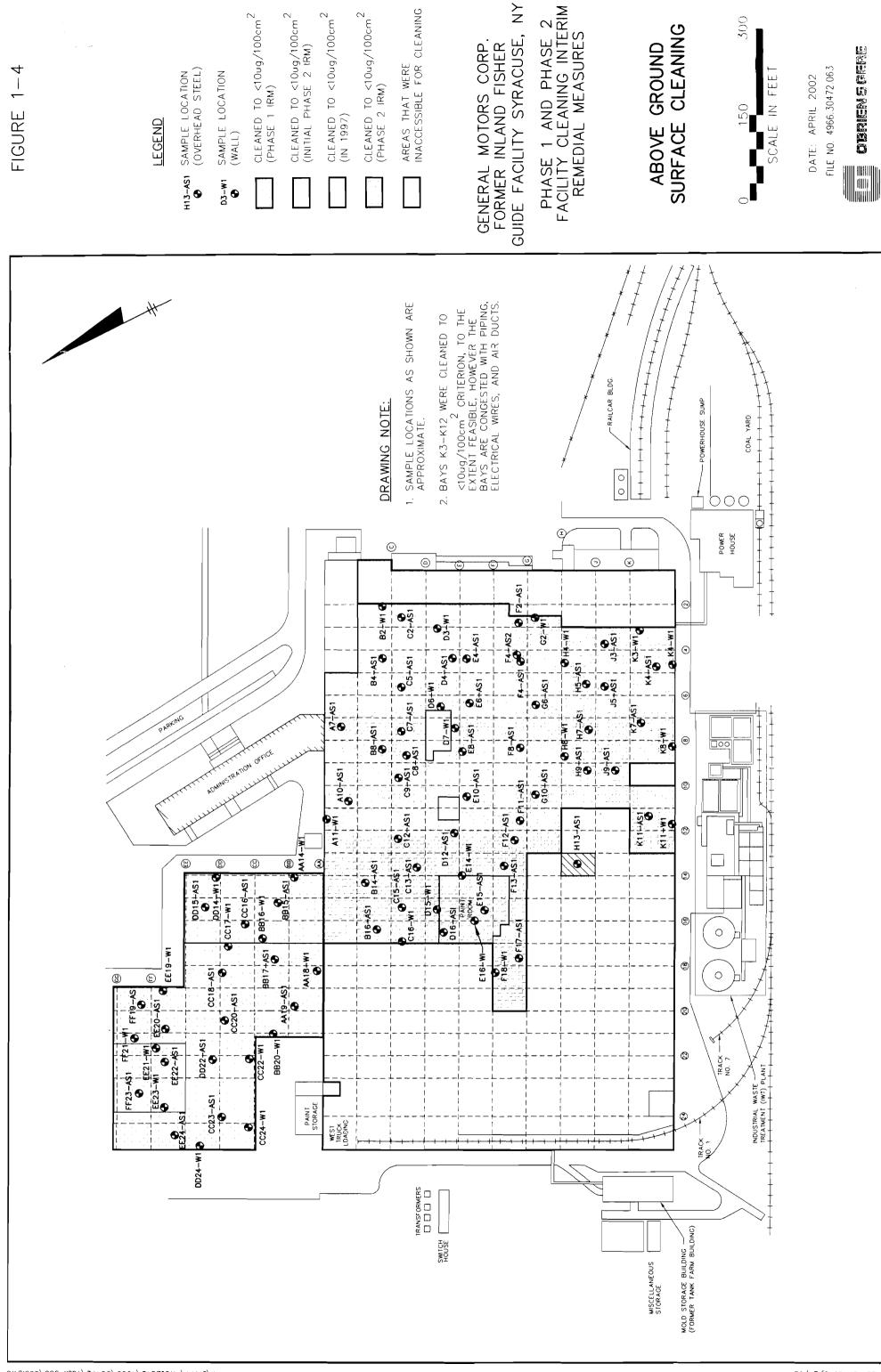
SITE PLAN

PHASE 1 AND PHASE 2 FACILITY CLEANING INTERIM REMEDIAL MEASURES GENERAL MOTORS CORP. FORMER INLAND FISHER GUIDE FACILITY SYRACUSE, NY





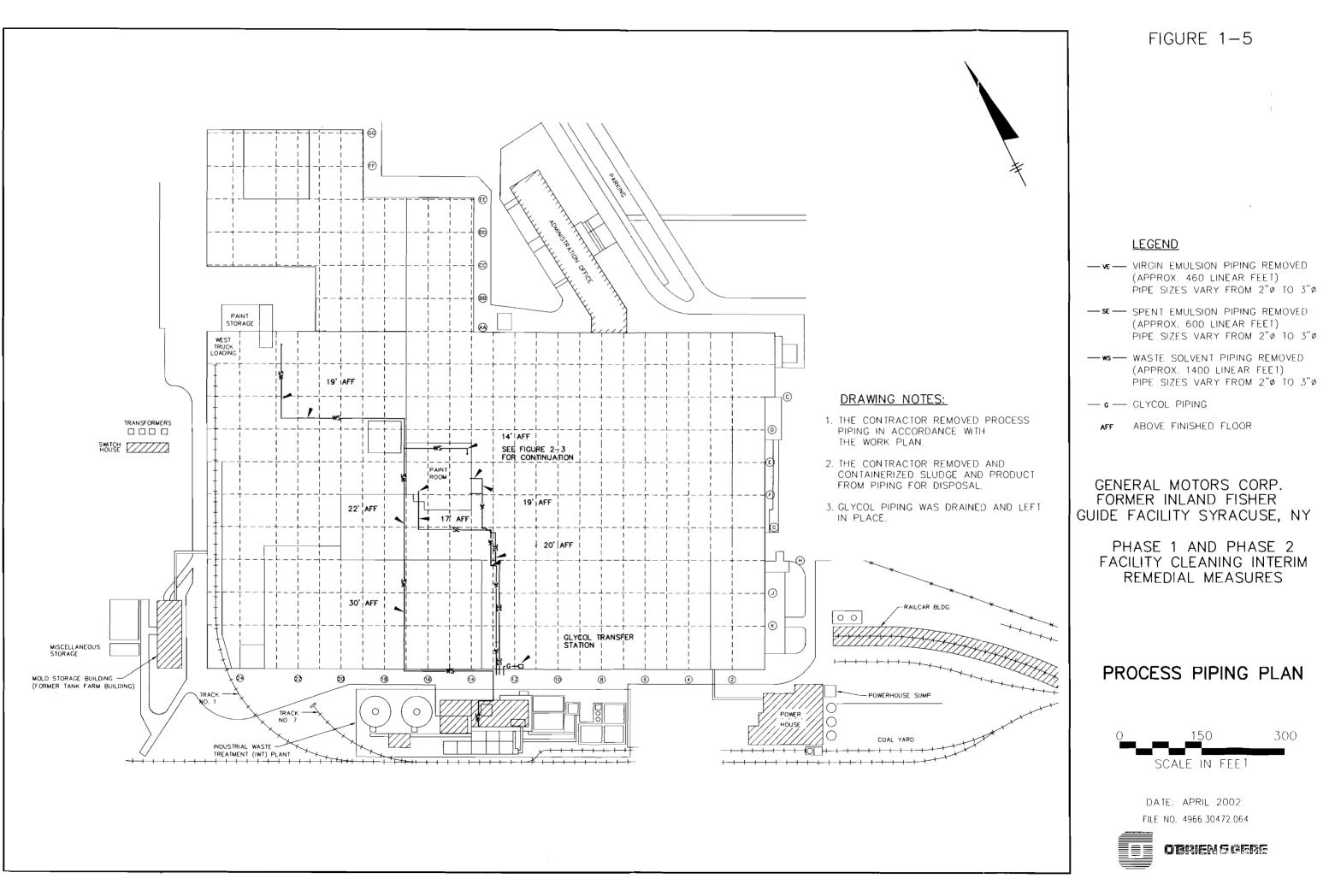
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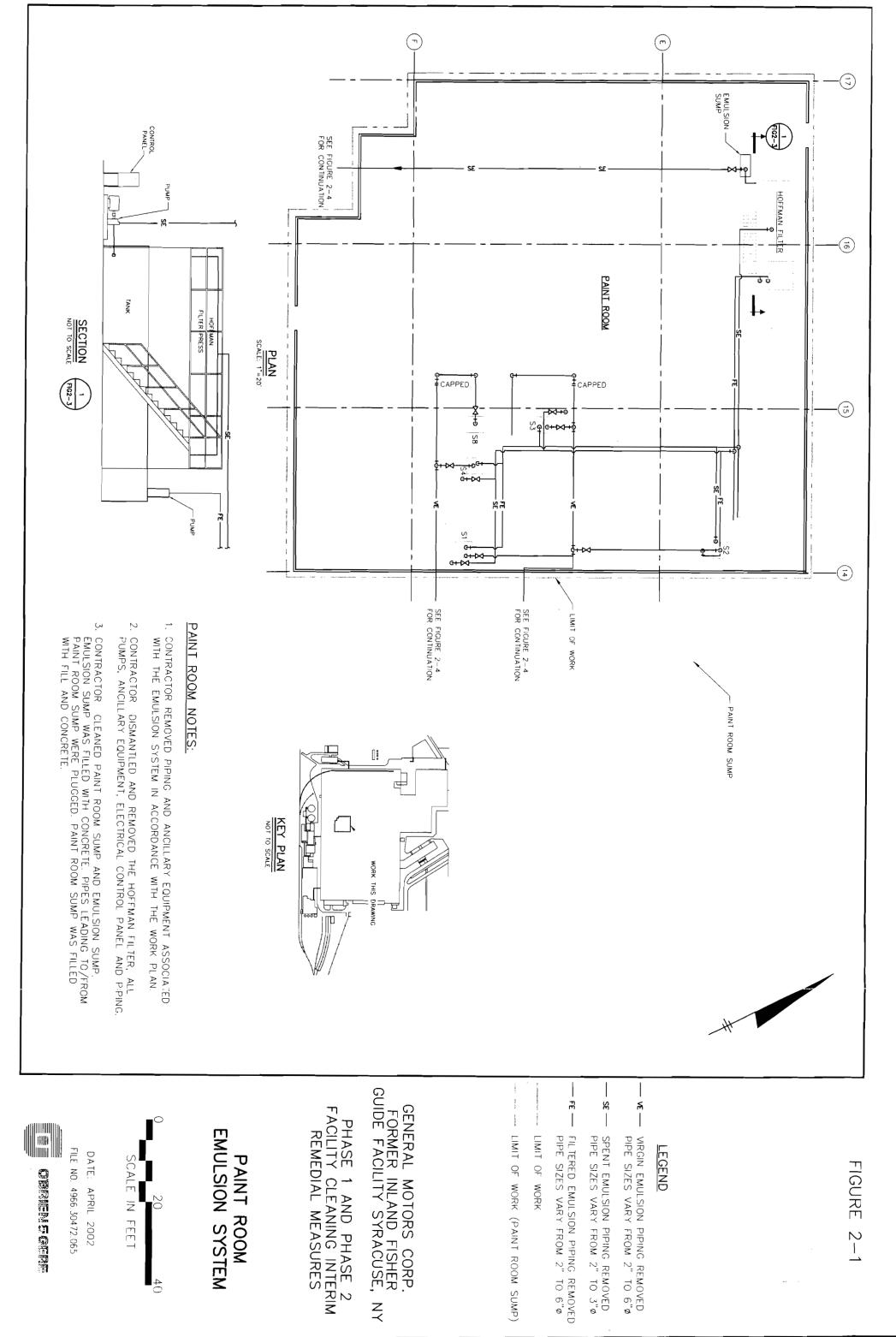


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PLOT DATE: 3/27/02

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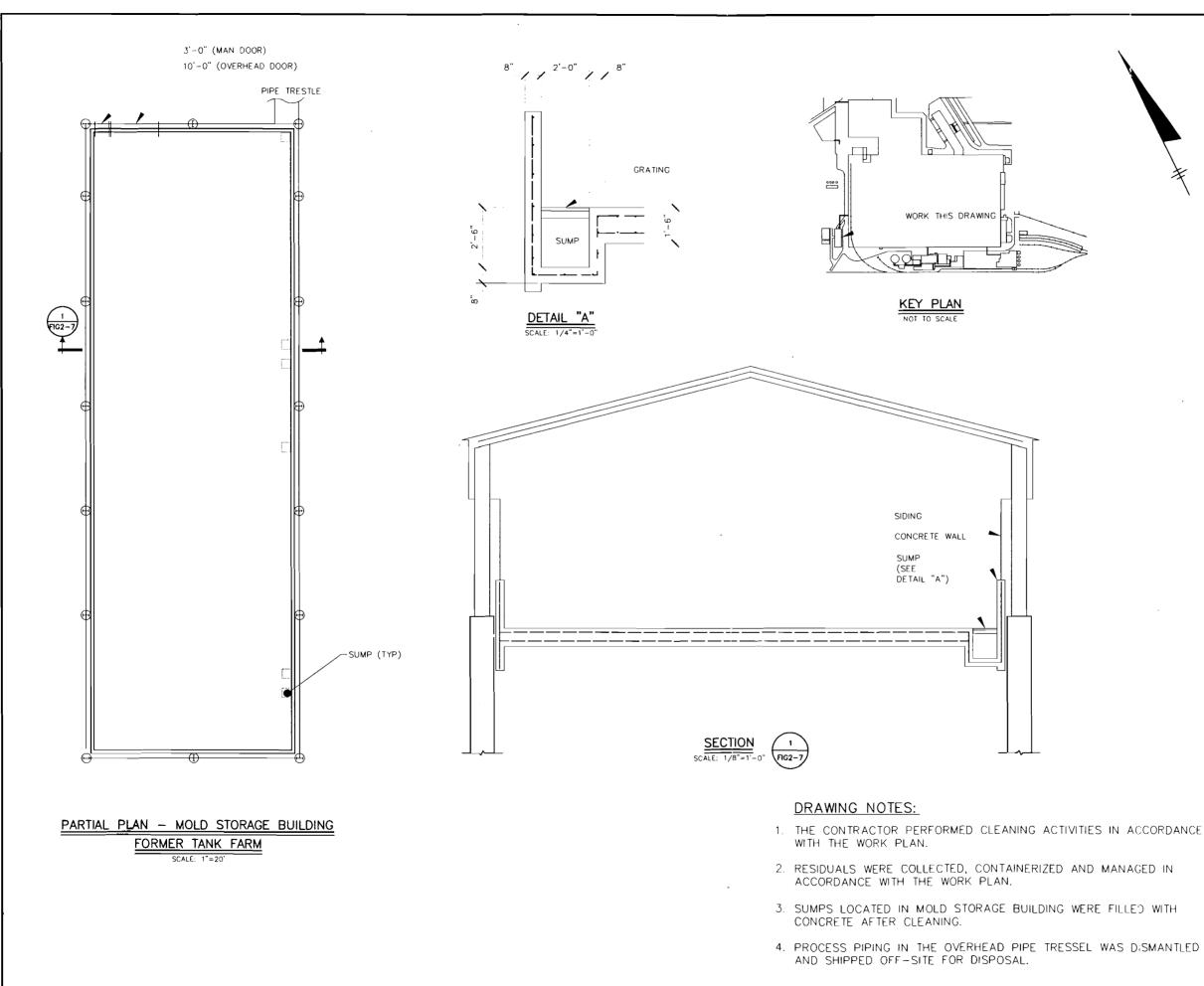


FIGURE 2-2

GENERAL MOTORS CORP. FORMER INLAND FISHER GUIDE FACILITY SYRACUSE, NY

PHASE 1 FACILITY CLEANING INTERIM REMEDIAL MEASURES

MOLD STORAGE BUILDING

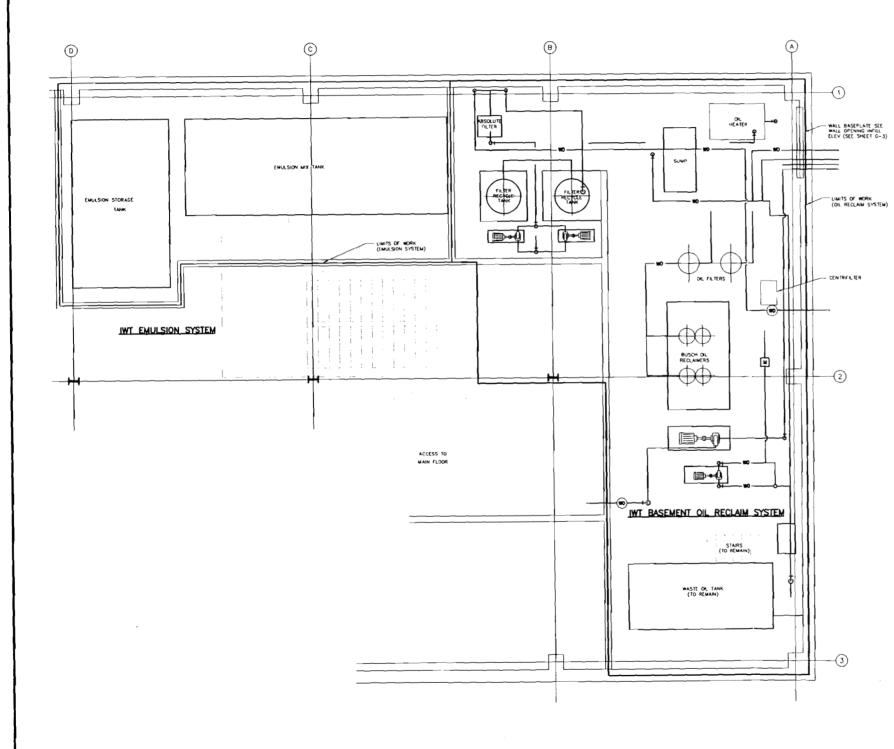
APPROXIMATE SCALE AS NOTED

FILE NO. 4966.30472.066

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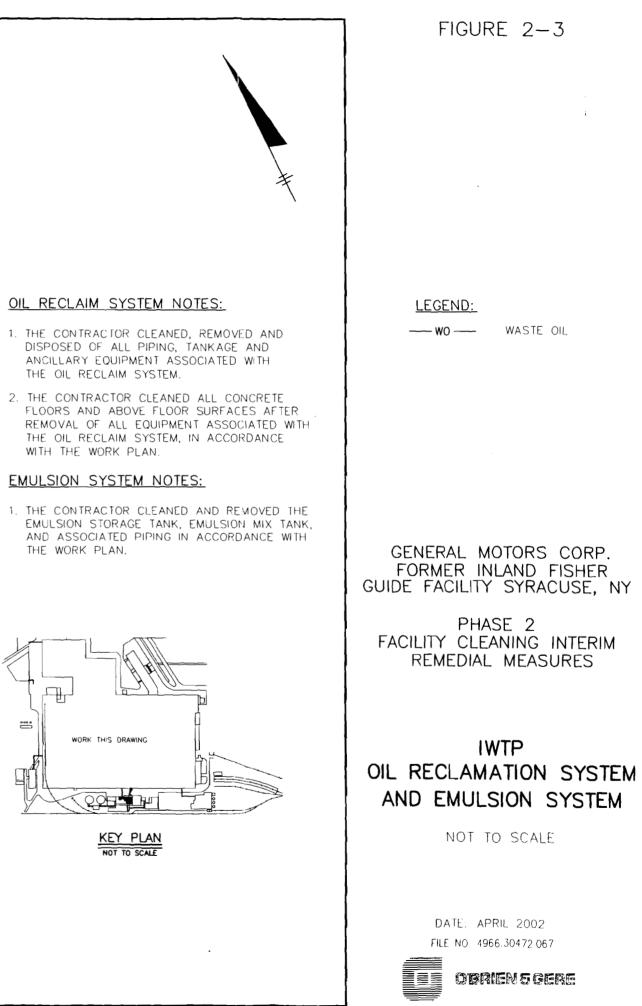
DATE: APRIL 2002

067 003 \PROJECTS\4966\30472\Task VDIV71



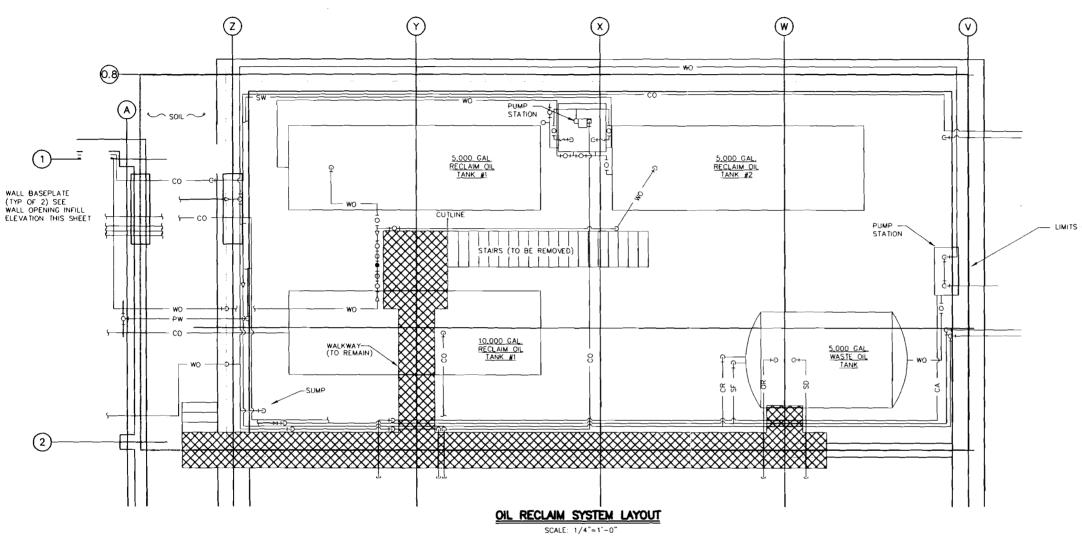
- THE OIL RECLAIM SYSTEM.
- WITH THE WORK PLAN.

THE WORK PLAN.



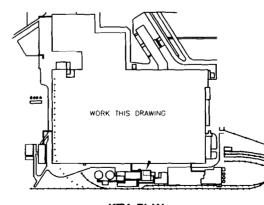
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068. 003 Task 966 \ 30472 \ S/4 â



GENERAL NOTES:

- 1. THE CONTRACTOR CLEANED, REMOVED AND DISPOSED OF ALL PIPING, TANKAGE AND ANCILLARY EQUIPMENT ASSOCIATED WITH THE OIL RECLAIM SYSTEM.
- 2. THE CONTRACTOR CLEANED ALL CONCRETE SURFACES AND STEEL BEAMS OF ALL EQUIPMENT ASSOCIATED WITH THE OIL RECLAIM SYSTEM.
- 3. THE CONTRACTOR PERFORMED EXCAVATION AS NECESSARY TO REMOVE PIPING BETWEEN THE IWTP AND THE OIL RECLAIM CONTAINMENT AREA.







OBRIEN 5 GERE

DATE: APRIL 2002 FILE NO. 4966.30472.068

APPROXIMATE SCALE AS NOTED

IWTP OIL RECLAMATION SYSTEM STORAGE TANKS

PHASE 2 FACILITY CLEANING INTERIM REMEDIAL MEASURES

GENERAL MOTORS CORP. FORMER INLAND FISHER GUIDE FACILITY SYRACUSE, NY



WALKWAY





— SW -----

- COMPRESSED AIR

- SS ----- STEAM SUPPLY
- CLEAN/RECLAIM OIL

----- STEAM RETURN

- CO -

- WO ------ WASTE OIL

- OR ----- OIL RETURN

CR -

SR -

- CA -
- SD ---
 - SCUM DISCHARGE
- PW-POTABLE WATER

SEAL WATER

LIMITS OF WORK

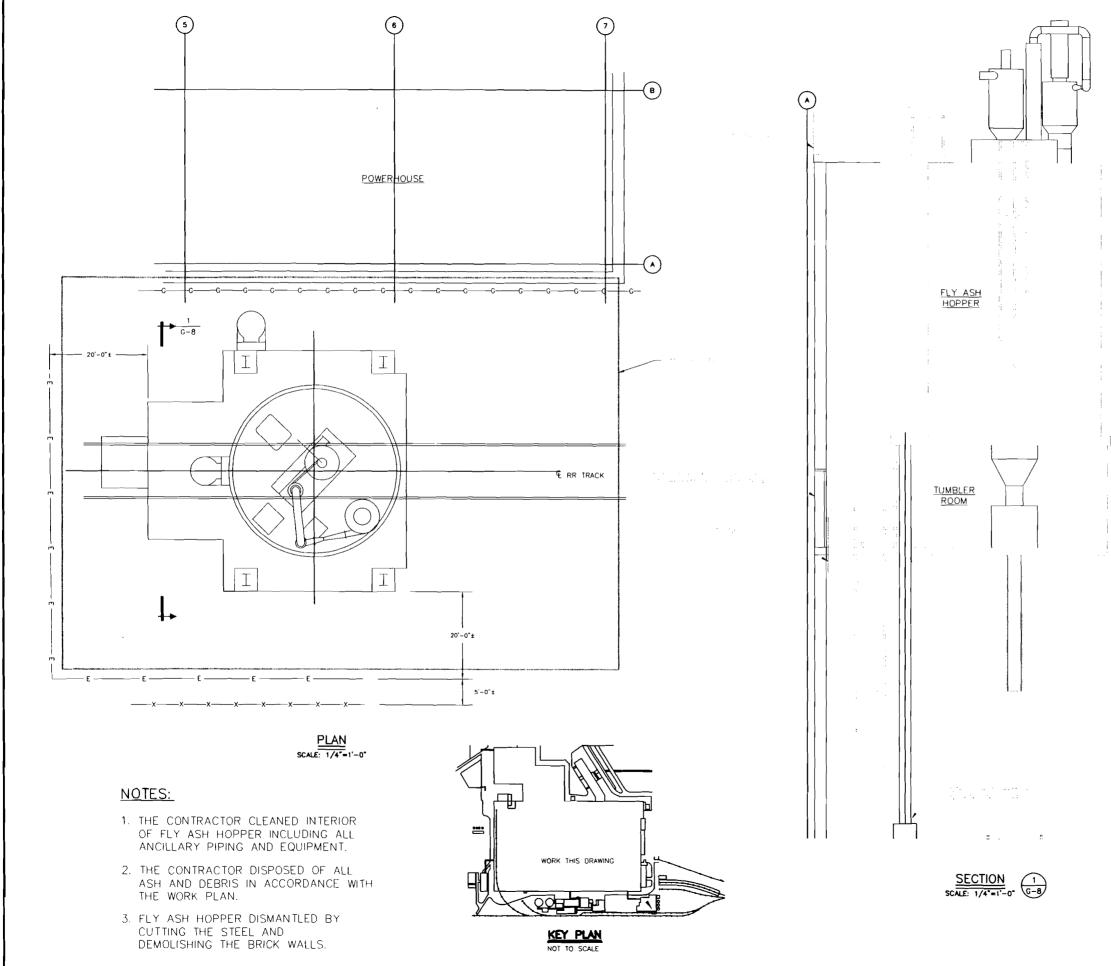
FIGURE 2-4

LEGEND:

CONDENSATE RETURN

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LIMITS OF WORK



0171\PROJECTS\4966\30472\Task 003\069.D

OT DATE: 3/27/02



OBRIEN 5 GERE

DATE: APRIL 2002 FILE NO. 4966.30472.069

APPROXIMATE SCALE AS NOTED

FLY ASH HOPPER

PHASE 2 FACILITY CLEANING INTERIM REMEDIAL MEASURES

GENERAL MOTORS CORP. FORMER INLAND FISHER GUIDE FACILITY SYRACUSE, NY

LIMIT OF WORK

FIGURE 2-5

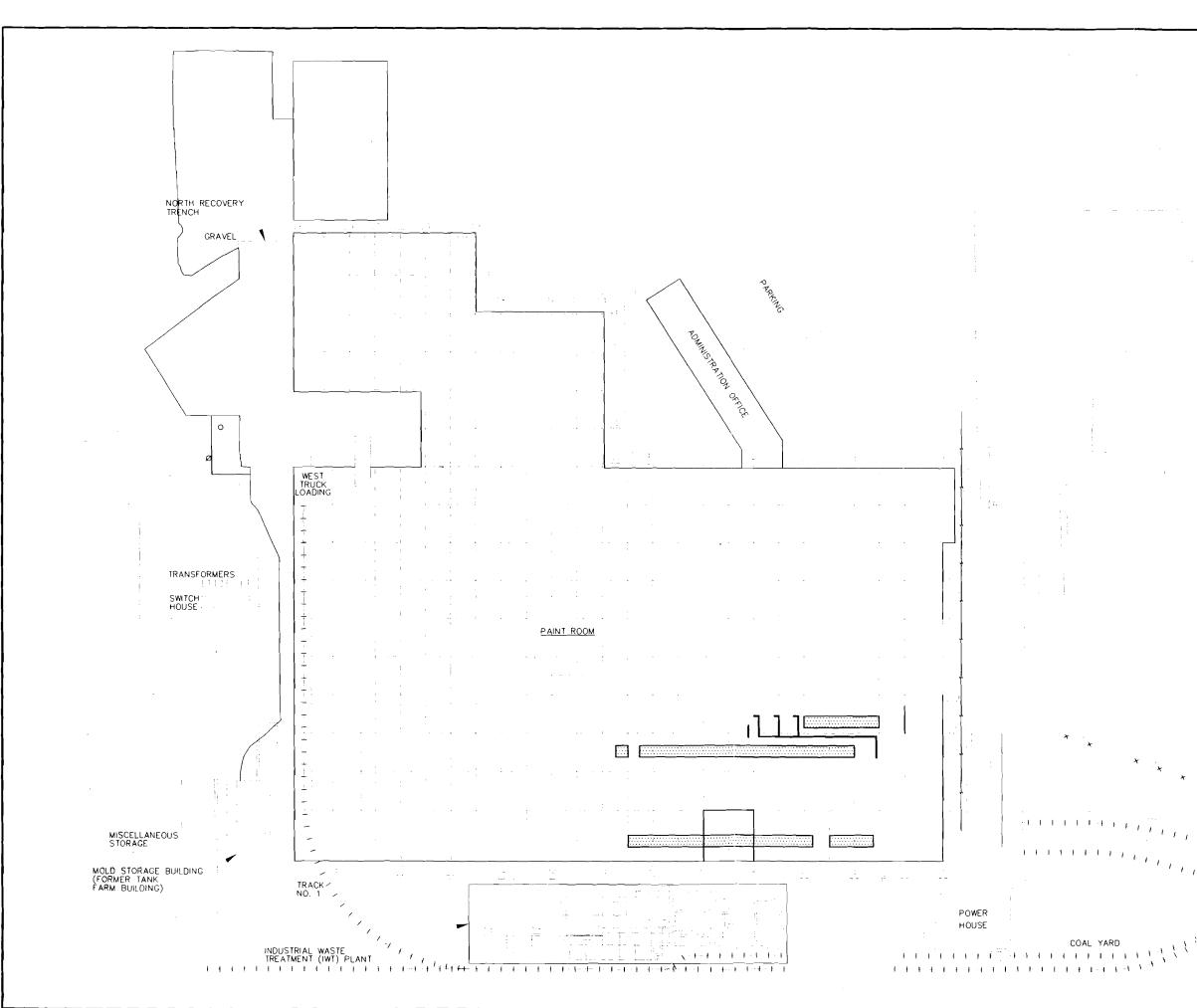


FIGURE 2-6



LEGEND

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MEZZANINES DEMOLISHED

PIPING REMOVED

NOTES;

- 1. CONTRACTOR REMOVED MEZZANINES IN BAYS G3-5, H4-13A AND K3-12.
- CONTRACTOR REMOVED COOLING WATER PIPING ALONG H COLUMN IN BAYS H3-7.

GENERAL MOTORS CORP. SYRACUSE, NEW YORK

DEMOLISHED STRUCTURES



DATE: APRIL 2002 FILE NO. 4966.30472.070



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EXHIBIT A

Manifest copies

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: States	WASTE MANIFEST	T I I I I I I I I I I I I I I I I I I I	345		ulon within neavy bold in squippd by Federal Law.
a l	3. Generator's Marrie and Mailing Address INLAND FISHER GUIDE GM 1 GENERAL MOTORS DR SYRACUSE NY 13206-0486 4. Generator's Telephone Number (315 432-5314		8.	NYB94 Generator's ID SAME	488394 i
610) 467-738	5. Transporter 1 (Company Name) G. USE Frank's Vacuum MY1A	Pa (D'Aumber 9, 8, 1, 7, 9, 3 Pa (D Number	814 a	State Wansporter's Transporter's Telept State Transporter's	one (716 7284-
+rvation (9. Casignated Facility Name and Site Address 1d, US E CWM CHEMICAL SERVICES, LLC.	HILIII. FAID Number		Thansporter's Teleph State Fasility (D	one (
Indial Corre	1550 BALMER RD.	рдэрэр	679	Facility Tetephone (716 754-	8231
invitramme	11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID ² RQ, POLYCHLORINATED BIPHENYLS, LIQU		12. Containers Number Type		14. Liniz WANDI I. Wassen N EPR
mant of E	SOLUTION, 9,UN2315,III		0.0.10 M	1200	K BUNS
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CWM Chemical Services, L.L.C. 1550 Balmer Rd. P.O. Box 200 Model City, N.Y. 14107 716/754-8231

Federal EPA ID: NYD049836679

INLAND FISHER GUIDE, GM ATTN: ENVIRONMENTAL COMPLIANCE NYD002239440 1 GENERAL MOTORS DRIVE SYRACUSE NY 13206-0486

CERTIFICATE OF DISPOSAL

CWM CHEMICAL SERVICES, L.L.C. has received waste material from INLAND FISHER GUIDE, GM on 04/26/01 as described on Hazardous Waste Manifest number NYB9488394 Sequence number 02. CWM CHEMICAL SERVICES, L.L.C. hereby certifies that the above described material was landfilled in accordance with the 40 CFR part 761 as it pertains to the land disposal of polychlorinated biphenyl contaminated materials.

Profile Number: CS9430 ""M Tracking ID: 8154279613 CWM Unit #: 1*0 thru 3*0 " Disposal Date: 04/27/01

Jnder civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C 1001 and 15 U.S.C. 2615) I certify that the information contained in or accompanying this document is true accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I -certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true accurate and complete.

Jonna Ames- Cussick

DONNA AMES-CASSICK COMPLIANCE MANAGER Certificate # 203095 05/01/01 For questions please call our Customer Service Dept. at (800) 843-3604



801 323 8903;.

03/29/01 10:22AN; Jetfax #85B;Page 3/5

STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOUD & HAZARDOUS MATERIALS

35401

NYG	17	41	03	2

HAZARDOUS WASTE MANIFEST

Plec	sse type or print. Do not stople	P.O.	Box 12820, Alb	any, New	York 1	2212		(Haaam	dous Massa hamana 17500;
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CERTIFICATE OF DISPOSAL

Safety-Kleen (Lonc & Grassy Moumath). Iuc. Grassy Mountain Pacifity 3 mi. Bast, 7 mi. North of Exà 41* Cilve UT EPA ID # - UTD991301748 As required by 40 CFR 761.218 (a), we are providing this Certificate of Disposal to IFG FACILTTY - SYRACUSE to confirm that load # 2001001411

WEIGHT KO TYPE DISPOSAL CELL DISPOSED	4253.97 BULK C2 /E17 /7 03/23/01
WASTE NAME	DODI697 SOIL/SLUGGE/PPE/DEBRIG
PROFILE No.	0801-0001
TINE	1/1

slupped on manifest number <u>NYD007239440-00344</u> wast/ware disposed in an EPA approved chemical waste landfill.

Under civil and criminal penalities of law for the making or submission of faise or fraudulant statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615). certly that the information contained in or accompanying this document is true, accumate and complete. As to the identified section(s) of this document for which I cannot pertonally verify truth and accuracy. I certify as the company ofheled having supervisory responsibility for the person who, acting under my direct instructions, made the verification that this function is trac, accurate and complete.

Cert # 016386

Grassy Mountain), Iac., Grassy Mountain Pacificy BPA ID# UTD991301748 Safety-Klean (Lone and

Stand W Wales ļ

Gary Mottor, General Manager

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(۵۱ د)		Syracuse, NY 13206 4. Generator's Telephone Number (5. Transporter 1 (Company Name)	6	(315) 764-2 6. US EPA ID Number	239		B. Generator's ID C. State Transporter's ID						
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COPY 2—Generator State—Mailed by TSD Facility

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		NYG 1048374 DMSION OF SOLID & HAZARDOUS MATERIALS HAZARDOUS WASTE MANIFEST	
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the National		and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state lows and regulations.	
Nat		If i arm a large quantity generator, i certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have datarmined to be economically provicable and that I have selected the practicable method of treatment, storage, or disposal currently evolvable to me which minimizes the	
#re		present and future threat to human bealth and the environment: OR if I am a small quantity generated. I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.	
or split immediately call		Edwin Blaha for James F. Hartrett Edwin Blaha 112/1300	
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cate of entergency	5	And Angel Name Signed Tre Ma. Day Year	
تا ا		Brandy Lucas Knampy LILAD ID1/115011	
		COPY 1—Disposer State Mailed by TSD Facility	
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1 sponse C		11-5; Owner The Case of Emergence CALL 24 11-05 1-800-424-8802 16. GENERATOR'S CERTIFICATION: I hereby declare that the pontents of this consignment are fully and accurately described above by proper shipping name								
ional Re:		and are classified, packed, marked and labeled, and are in all respects in national government regulations and state laws and regulations.	proper condition for	transport	by highv	vay according to a	pplicable	international and		
or spill immediately call the National Response Cen		If I am a large quantity generator, I certify that I have a program in place to be economically practicoble and that I have selected the practicable mo- present and future threat to human health and the environment; OR if I a generation and select the best waste management method that is availab	ethod of treatment, si am a small quantity g	torage, or enerator, l	disposal	currently available	e to me v	which minimizes the		
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COPY 5—Generator—Mailed by TSD Facility



JANUARY 18, 2001

^{*}nvironmental Manager
ENERAL MOTORS CORPORATION
[†]INLAND FISHER GUIDE
¹ GENERAL MOTORS DRIVE
^{*}YRACUSE, NEW YORK 13206

RE: Certificates of Disposal

___ear Environmental Manager:

nclosed please find your Certificate(s) of Disposal and accompanying detailed report(s) for the waste that was shipped to our facility for treatment. Your original manifest number is referenced on both these documents along with a Safety-Kleen Aragonite document number.

Your waste has been properly treated and the residue from this waste 'as been disposed of at an approved and permitted hazardous waste andfill.

Safety-Kleen appreciates you as a valued customer. If you should ave any questions or concerns please do not hesitate to contact one i our customer/facility representatives at (801) 323-8100.

incerely

Facility Sales Manager

lclosures





JANUARY 18, 2001

ENERAL MOTORS CORPORATION INLAND FISHER GUIDE GENERAL MOTORS DRIVE YRACUSE, NEW YORK 13206

EPA ID: NYD 002 239 440

PCB

Certificate of Disposal

No. 145327

Customer Manifest: 00340 Document: K0029 destroyed as of JANUARY 17, 2001

•Ans is to certify that the hazardous material manifested to Safety-Kleen on the above Safety-Kleen Aragonite Document Number was disposed of y incineration in accordance with 40 CFR 761 (and 40 CFR 264 if applicable) ____s of the above certification date.

'ttached is a detailed report which identifies the date(s) of disposal. esidue from this waste has been disposed of at an approved and permitted mazardous Waste Landfill.

nder civil and criminal penalties of law for the making or submission of alse or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying his document is true, accurate, and complete. As to the identified action(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verificaion that this information is true, accurate, and complete.

> Safety-Kleen, Aragonite UT EPA ID # UTD 981 552 177

Facility Sales Manager

Page: 1 Certificate of Disposal - Detail Report 01/18/2001 06:53

merator: 700578 GENERAL MOTORS CORPORATION

 CD # Document #
 Item State #
 Customer #
 Types
 Weight Received
 Destroyed
 Drum Srl Num

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 K0029
 1
 NYG1048365
 00340
 DM
 363
 01/02/2001
 01/17/2001
 001213-001

 145327
 K0029
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 NYG1048365
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ee	ase type or print. Do not staple	HAZARDOUS P.O. Box 12820, A				311	(Hazan	dous Waste Manifest 1/5/99)
-		or's US EPA ID No.	Manifest D	_	2. Page		n within	heavy bold line
	WASTE MANIFEST	0 0 2 2 3 9 4 4	0003	39	2	is not requ	rired by F	ederal Law.
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of Environmental Conservation (518) 457-7362	SAFETY-KLEEN, INC. (GRAYBAC 3 MILES E. 7 MILES N OF EXI		-		H. Facility	Telephone (80)	1) 32	3-8900
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call the National Kesponse Center (800)	national government regulations and stote lows and If I am a large quantity generator, I certify that I has to be economically practicable and that I have sele- present and future threat to human health and the	ve a program in place to re cted the practicable method	l of treatment, s	storage,	or disposa	l currently availabl	e to me v	which minimizes the
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and are classified, packed, marked and labeled, national government regulations and state laws of		per condition for	r transport b	y highwa	by according to a	opplicable	international and
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CERTIFICATE OF DISPOSAL

Safety-Kleen (Lone & Grassy Mountain), Inc. Grassy Mountain Facility 3 mi. East, 7 mi. North of Exit 41* Clive UT EPA ID # - UTD991301748

As required by 40 CFR 761.218 (a), we are providing this Certificate of Disposal to INLAND FISHER GUIDE DIVISION O to confirm that load # 2000006429

LINE	PROFILE No.	WASTE NAME	WEIGHT Kg TYPE	DISPOSAL CELL	DISPOSED
1/A	GB92-0408	130576 PCB DEBRIS, AND/OR RAGS	12934.24 BULK	CZ /G18 /7	12/19/00

shipped on manifest number NYD002239440-00338 was/were disposed in an EPA approved chemical waste landfill.

Under civil and criminal penalties of law for the making or submission of false or fraudulant statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the person who, acting under my direct instructions, made the verification that this information is true, accurate and complete.

Cert. # 015277

Safety-Kleen (Lone and Grassy Mountain), Inc., Grassy Mountain Facility EPA ID# UTD991301748

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Gary Mossor, General Manager

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	STATE OF NEW YORK 30046 DEPARTMENT OF ENVIRONMENTAL CONSERVATION DIVISION OF SOLID & HAZARDOUS MATERIALS											
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	UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's US E	EPA ID No. Manifest Doc. No.			2. Page 1 of Information within heavy bold line is not required by Federal Law.						
			223944		<u>33</u>	2						
	3.Generator's Name and Mailing Ad	LINLAND	FISHER GUID			NYG 1764648						
<u> </u>			SE, NY 1320			B. Genera						
	 Generator's Telephone Number (Transporter 1 (Company Name) 		-5000				1E Transporter's ID	<u>- 1- 7 (</u>	olar ust			
	TONAWANDA TANK		US EPA ID Number	4 4 8	0 1		orter's Telephone		888-8265			
	7 Transporter 2 (Company Name)) ·	US EPA ID Number				iransporter's ID	VVV				
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COPY 1—Disposer/State—Mailed by TSD Facility

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CERTIFICATE OF DISPOSAL

Safety-Kleen (Lone & Grassy Mountain), Inc. Grassy Mountain Facility 3 mi. East, 7 mi. North of Exit 41* Clive UT EPA ID # - UTD991301748

As required by 40 CFR 761.218 (a), we are providing this Certificate of Disposal to INLAND FISHER GUIDE DIVISION O to confirm that load # 2000005440

LINE	PROFILE No.	WASTE NAME	WEIGHT Kg TYPE	DISPOSAL CELL	D I SPOSED
1/A	GB92-0408	130576 PCB DEBRIS, AND/OR RAGS	18240.36 BULK	CZ /G14 /7	11/08/00

shipped on manifest number <u>NYD002239440-00333</u> was/were disposed in an EPA approved chemical waste landfill.

Under civil and criminal penalties of law for the making or submission of false or fraudulant statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the person who, acting under my direct instructions, made the verification that this information is true, accurate and complete.

Cert. # 014662

Safety-Kleen (Lone and Grassy Mountain), Inc., Grassy Mountain Facility EPA ID# UTD991301748

Gary Mossor, General Manager

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	4. Generator's Phone (315) 764-2239	SYRACUSE, N	íY 13206				icnerator's l				
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te de visit la seconda	4 UPS #55530 1 9 Ref NG 19 Le 80 16/2551 15. Special Handling Instructions and Addition a. UPS #55630-ERG #128 D039	gal Hor	94/20			b			đ		
	24 HR EMERGENCY RESPONSE NU 16. GENERATOR'S CERTIFICATION: I he classified, packed, marked and labeled, and an regulations and state laws and regulations. If I am a farge quantity periorstor, I certify that I i practicable and that I have solected the practice health and the orwingment; OR H I am a small g to me and that I dan actoriz. MintedTyped Name	roby declare that th i in all respects in save program in pla bite method treatm enerator, I have may	e contents of this consignme proper schulicos for transpo ce to raduce the volume and r wr, storage, or disposal curr	t by high axialty of why avai lize my w	waste gene lable to me aste and so	ling to erstañ k which t	applicable inte stoe degree I i nimimizes the	national lave deler present a	nd lub	i to be economically ure threat to furmer	У. П
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Response Center (80	15. Special Handling Instructions and Additional Information Accumulation start date: 7/31/00 Finergency Response: 1-800-424-8802 Roll-off ID: UPCU 10.3013 ERR 16. GENERATOR'S CERTIFICATION: Thereby declare that the contents of this consignment are fully and accurately described above by proper shipping nar											
the National	and are classified, packed, marked and labeled, national government regulations and state laws If I am a large quantity generator, I certify that I to be economically practicable and that I have s present and future threat to human health and generation and select the best waste managem	and regulations. I have a program in place to selected the practicable met the environment; OR if I an	a reduce the volur thod of treatment, n a small quantity	me and taxic storage, or generatar, l	ity of wo	aste generated to currently availab	the degree	ee I have determined which minimizes the				
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COPY 1—Disposer State—Mailed by TSD Facility

CERTIFICATE OF DISPOSAL

Safety-Kleen (Lone & Grassy Mountain), Inc. Grassy Mountain Facility 3 mi. East, 7 mi. North of Exit 41* Clive UT EPA ID # - UTD991301748

As required by 40 CFR 761.218 (a), we are providing this Certificate of Disposal to <u>INLAND FISHER GUIDE DIVISION 0</u> to confirm that load # 2000005441

LINE	PROFILE No.	WASTE NAME	WEIGHT Kg TYPE	DISPOSAL CELL	DISPOSED
1/A	GB92-0408	130576 PCB DEBRIS, AND/OR RAGS	11936.51 BULK	CZ /F14 /7	11/08/00

shipped on manifest number NYD002239440-00331 was/were disposed in an EPA approved chemical waste landfill.

Under civil and criminal penalties of law for the making or submission of false or fraudulant statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the person who, acting under my direct instructions, made the verification that this information is true, accurate and complete.

Cert. # 014664

Safety-Kleen (Lone and Grassy Mountain), Inc., Grassy Mountain Facility EPA ID# UTD991301748

Gary Mossor, General Manager

l			NYG 1048212	STATE DEPARTMENT OF ENV DIVISION OF SOLI						
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ļ	ţ		present and future threat to human health and the generation and select the best waste management r	enviranment; OR if I am	a small quantity	generator	, I have n	nade a good faith	effort to i	minimize my waste
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COPY 5—Generator—Mailed by TSD Facility



NOVEMBER 01, 2000

Environmental Manager GENERAL MOTORS CORPORATION INLAND FISHER GUIDE ACG IFG 1000 TOWNLINE ROAD SYRACUSE, NEW YORK 13206

RE: Certificates of Disposal

Dear Environmental Manager:

Enclosed please find your Certificate(s) of Disposal and accompanying detailed report(s) for the waste that was shipped to our facility for treatment. Your original manifest number is referenced on both of these documents along with a Safety-Kleen Aragonite document number.

Four waste has been properly treated and the residue from this waste has been disposed of at an approved and permitted hazardous waste landfill.

Safety-Kleen appreciates you as a valued customer. If you should have any questions or concerns please do not hesitate to contact one of our customer/facility representatives at (801) 323-8100.

Sincerely,

Facility Sales Manager

Enclosures

RECEIVED 1/2/01 EBR



___ NOVEMBER 01, 2000

GENERAL MOTORS CORPORATION INLAND FISHER GUIDE ACG IFG 1000 TOWNLINE ROAD SYRACUSE, NEW YORK 13206

EPA ID: NYD 002 239 440

Certificate of Disposal

No. 140965

Customer Manifest: 00326 Document: J5285 destroyed as of OCTOBER 31, 2000

- This is to certify that the hazardous material manifested to Safety-Kleen on the above Safety-Kleen Aragonite Document Number was disposed of 'y incineration in accordance with 40 CFR 761 (and 40 CFR 264 if applicable) as of the above certification date.
- Attached is a detailed report which identifies the date(s) of disposal. Residue from this waste has been disposed of at an approved and permitted Hazardous Waste Landfill.
- Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

Safety-Kleen, Aragonite UT EPA ID # 1552 177

Facility Sales Manager

P.O. BOX 22890

SAFETY-KLEEN (ARAGONITE), INC. SALT LAKE CITY, UT 84122-0890 801.323.8100 FAX 801.323.8877 Page: 1 Certificate of Disposal - Detail Report 11/01/2000 06:51

Generator: 700578 GENERAL MOTORS CORPORATION

CD # Document # Item State # Customer # Types Weight Received Destroyed Drum Srl Num 140965 J5285 1 NYG1048212 00326 DM 390 09/27/2000 10/31/2000

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COPY 5—Generator—Mailed by TSD Facility

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OCTOBER 10, 2000

GENERAL MOTORS CORPORATION INLAND FISHER GUIDE ACG IFG 1000 TOWNLINE ROAD SYRACUSE, NEW YORK 13206

EPA ID: NYD 002 239 440

PCB

Certificate of Disposal

No. 140121

Customer Manifest: 00322 Document: J4693 destroyed as of OCTOBER 06, 2000

- This is to certify that the hazardous material manifested to Safety-Kleen on the above Safety-Kleen Aragonite Document Number was disposed of by incineration in accordance with 40 CFR 761 (and 40 CFR 264 if applicable) as of the above certification date.
- Attached is a detailed report which identifies the date(s) of disposal. Residue from this waste has been disposed of at an approved and permitted Hazardous Waste Landfill.
- Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

Safety-Kleen, Aragonite UT EPA ID # UTD 981 552 177

Sales Manager Facility

SAFETT-KLEEN CORP. 11600 N. APTUS ROAD ARAGONITE, UT 84029

OCT 20 2000 16:38

821 323 8877

801/\$23-8100

PAGE.02

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OCTOBER 09, 2000

- Environmental Manager GENERAL MOTORS CORPORATION INLAND FISHER GUIDE ACG IFG 1000 TOWNLINE ROAD SYRACUSE, NEW YORK 13206
- ·
- RE: Certificates of Disposal

Dear Environmental Manager:

Enclosed please find your Certificate(s) of Disposal and accompanying detailed report(s) for the waste that was shipped to our facility for treatment. Your original manifest number is referenced on both of these documents along with a Safety-Kleen Aragonite document number.

- Your waste has been properly treated and the residue from this waste has been disposed of at an approved and permitted hazardous waste landfill.
- Safety-Kleen appreciates you as a valued customer. If you should have any questions or concerns please do not hesitate to contact one of our customer/facility representatives at (801) 323-8100.

Sincerely,

Facility Sales Manager

Enclosures



OCTOBER 09, 2000

GENERAL MOTORS CORPORATION INLAND FISHER GUIDE ACG IFG 1000 TOWNLINE ROAD SYRACUSE, NEW YORK 13206

EPA ID: NYD 002 239 440

PCB

Certificate of Disposal

No. 140007

Customer Manifest: 00322 Document: J4693 destroyed as of OCTOBER 05, 2000

- his is to certify that the hazardous material manifested to Safety-Kleen on the above Safety-Kleen Aragonite Document Number was disposed of by incineration in accordance with 40 CFR 761 (and 40 CFR 264 if applicable) as of the above certification date.
- Attached is a detailed report which identifies the date(s) of disposal. Residue from this waste has been disposed of at an approved and permitted Hazardous Waste Landfill.
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- this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility
- for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

Safety-Kleen, Aragonite UT EPA ID # UTD 981 552 177

Facility Sales Manager

SAFETY-KLEEN (ARAGONITE), INC.

P.O. BOX 22890

SALT LAKE CITY, UT 84122-0890 801.323.8100 FAX 801.323.8877

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Page: 1 Certificate of Disposal - Detail Report 10/09/2000 05:51

Generator: 700578 GENERAL MOTORS CORPORATION

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	CD #	Document	# Item	State #	Customer #	Types	Weight	Received	Destroyed	Drum Srl Num
	140007	J4693	1	NYG1048239	00322	DM	432	08/23/2000	10/05/2000	IFG-1
	140007	J4693	2	NYG1048239	00322	DM	424	08/23/2000	10/05/2000	1FG-2
-	140007	J4693	3	NYG1048239	00322	DM	432	08/23/2000	10/05/2000	IFG-3
		J4693	4	NYG1048239	00322	DM	465	08/23/2000		IFG-4
	1,753 165									
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OCTOBER 10, 2000

GENERAL MOTORS CORPORATION — INLAND FISHER GUIDE ACG IFG 1000 TOWNLINE ROAD SYRACUSE, NEW YORK 13206

EPA ID: NYD 002 239 440

PCB

Certificate of Disposal

No. 140121

Customer Manifest: 00322 Document: J4693 destroyed as of OCTOBER 06, 2000

- his is to certify that the hazardous material manifested to Safety-Kleen on the above Safety-Kleen Aragonite Document Number was disposed of by incineration in accordance with 40 CFR 761 (and 40 CFR 264 if applicable) as of the above certification date.
- Attached is a detailed report which identifies the date(s) of disposal. Residue from this waste has been disposed of at an approved and permitted Hazardous Waste Landfill.
- Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

Safety-Kleen, Aragonite UT EPA ID # UTD 981 552 177

Facility Sales Manager

SAFETY-KLEEN CORP. 11600 N. APTUS ROAD ARAGONITE, UT 84029 801/323-8100 Page: 1 Certificate of Disposal - Detail Report 10/10/2000 05:57

Generator: 700578 GENERAL MOTORS CORPORATION

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140007	J4693	2	NYG1048239	00322	DM	424	08/23/2000	10/05/2000	IFG-2
140007	J4693	3	NYG1048239	00322	DM	432	08/23/2000	10/05/2000	IFG-3
 140121	J4693	4	NYG1048239	00322	DM	465	08/23/2000	10/06/2000	IFG-4

NYG1764612 • •

STATE OF NEW YORK DEPARTMENT OF ENVIRONMENTAL CONSERVATION DIVISION OF SOLID & HAZARDOUS MATERIALS



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	ACCUMULATION START DATE: 5/11/00 EMERGENCY RESPONSE: 1-800-424-8802 ROLL-OFF ID: UPCU 410333 LOCAL RESPONSE: 315-432-5000												
Ì	16. GENERATOR'S CERTIFICATION: and are classified, packed, marked or	nd labeled, and ar	e in all respect	ts of this cost in prope	onsignment r condition f	ore fully or trans	y and port b	accura w high	tely describe way accordin	d above i g to appl	by proj icable	per shippir internatio	ng nom noi and
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CERTIFICATE OF DISPOSAL

Safety-Kleen (Lone & Grassy Mountain), Inc. Grassy Mountain Facility 3 mi. East, 7 mi. North of Exit 41* Clive UT EPA ID # - UTD991301748

As required by 40 CFR 761.218 (a), we are providing this Certificate of Disposal to <u>INLAND FISHER GUIDE DIVISION O</u> to confirm that load # 2000004007

LINE	PROFILE No.	WASTE NAME	WEIGHT Kg TYPE	DISPOSAL CELL	DISPOSED
1/A	G892-0408	130576 PCB DEBRIS, AND/OR RAGS	6530.61 BULK	CZ /F11 /7	08/18/00

shipped on manifest number NYD002239440-00321 was/were disposed in an EPA approved chemical waste landfill.

Under civil and criminal penalties of law for the making or submission of false or fraudulant statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the person who, acting under my direct instructions, made the verification that this information is true, accurate and complete.

Cert. # 013013

Safety-Kleen (Lone and Grassy Mountain), Inc., Grassy Mountain Facility EPA ID# UTD991301748

Hory & Moson

Gary Mossor, General Manager

	NYG 1048293 HAZARDOUS WASTE	CONSERVAT	5	2015		9
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	5. Transporter : (Company Norma) 2. US BA10 Number TTZ: SHATE Motor TRANS; + CO MIO: D10:95:03:89			iransporter's ID	(47)	624-31
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	Arrison Ac, UT 84122 UTTDA 811515121	177				- 3 8100
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SEPTEMBER 12, 2000

Environmental Manager GENERAL MOTORS CORPORATION INLAND FISHER GUIDE ACG IFG 1000 TOWNLINE ROAD SYRACUSE, NEW YORK 13206

RE: Certificates of Disposal

Dear Environmental Manager:

Enclosed please find your Certificate(s) of Disposal and accompanying detailed report(s) for the waste that was shipped to our facility for treatment. Your original manifest number is referenced on both these documents along with a Safety-Kleen Aragonite document number.

 Your waste has been properly treated and the residue from this waste has been disposed of at an approved and permitted hazardous waste landfill.

Safety-Kleen appreciates you as a valued customer. If you should have any questions or concerns please do not hesitate to contact one of our customer/facility representatives at (801) 323-8100.

Sincerely,

ager Enclosures



Page: 1 Certificate of Disposal - Detail Report 09/12/2000 05:40

nerator: 700578 GENERAL MOTORS CORPORATION

in mit	CD #	Document #	Item	State #	Customer #	Types	Weight	Received	Destroyed	Drum Srl Num
		J4327	1	NYG1048293	00319	DM	497	08/08/2000		GMA-1
		J4327	2	NYG1048293	00319	DM	486	08/08/2000		GMA-2
		J4327	3	NYG1048293	00319	DM	469	08/08/2000		GMA-3
		J4327	4	NYG1048293	00319	DM	469	08/08/2000		GMA-4
		J4327	5	NYG1048293	00319	DM	458	08/08/2000		GMA-5
		J4327	6	NYG1048293	00319	DM	486	08/08/2000		GMA-6
		J4327	7	NYG1048293	00319	DM	476	08/08/2000		GMA-7
		J4327	8	NYG1048293	00319	DM	476	08/08/2000		GMA-8
	138629	J4327	9	NYG1048293	00319	DM	450	08/08/2000	09/09/2000	
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							4,267	7		



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- SEPTEMBER 12, 2000

GENERAL MOTORS CORPORATION INLAND FISHER GUIDE ACG IFG 1000 TOWNLINE ROAD SYRACUSE, NEW YORK 13206

EPA ID: NYD 002 239 440

PCB

Certificate of Disposal

No. 138629

- Customer Manifest: 00319 Document: J4327 destroyed as of SEPTEMBER 09, 2000
- Inis is to certify that the hazardous material manifested to Safety-Kleen on the above Safety-Kleen Aragonite Document Number was disposed of by incineration in accordance with 40 CFR 761 (and 40 CFR 264 if applicable) as of the above certification date.
- Attached is a detailed report which identifies the date(s) of disposal. Residue from this waste has been disposed of at an approved and permitted Hazardous Waste Landfill.
- Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

Safety-Kleen, Aragonite/UT EPA ID # UTD 981 552 177

Facility Sales Manager

P.O. BOX 22890

SALT LAKE CITY, UT 84122-0890 801-323-8100

SAFETY-KLEEN (ARAGONITE), INC.

FAX 801-323-8877



SEPTEMBER 19, 2000

Environmental Manager GENERAL MOTORS CORPORATION INLAND FISHER GUIDE ACG IFG 1000 TOWNLINE ROAD SYRACUSE, NEW YORK 13206

RE: Certificates of Disposal

Dear Environmental Manager:

Enclosed please find your Certificate(s) of Disposal and accompanying detailed report(s) for the waste that was shipped to our facility for treatment. Your original manifest number is referenced on both these documents along with a Safety-Kleen Aragonite document number.

Your waste has been properly treated and the residue from this waste has been disposed of at an approved and permitted hazardous waste landfill.

Safety-Kleen appreciates you as a valued customer. If you should have any questions or concerns please do not hesitate to contact one of our customer/facility representatives at (801) 323-8100.

Sincerely,

Sales Manager Enclosures



SEPTEMBER 19, 2000

GENERAL MOTORS CORPORATION INLAND FISHER GUIDE ACG IFG 1000 TOWNLINE ROAD SYRACUSE, NEW YORK 13206

EPA ID: NYD 002 239 440

PCB

Certificate of Disposal

No. 138983

- Customer Manifest: 00319 Document: J4327 destroyed as of SEPTEMBER 17, 2000

This is to certify that the hazardous material manifested to Safety-Kleen on the above Safety-Kleen Aragonite Document Number was disposed of by incineration in accordance with 40 CFR 761 (and 40 CFR 264 if applicable) as of the above certification date.

Attached is a detailed report which identifies the date(s) of disposal. Residue from this waste has been disposed of at an approved and permitted ______ Hazardous Waste Landfill.

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

Safety-Kleen, Aragonite UT EPA ID # UTD 98<u>1 5</u>52/177

Facility Sales Manager

SAFETY-KLEEN (ARAGONITE), INC. P.O. BOX 22890 SALT LAKE CITY, UT 84122-0890 801-323-8100 FAX 801-323-8877 Page: 1 Certificate of Disposal - Detail Report 09/19/2000 05:47

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enerator: 700578 GENERAL MOTORS CORPORATION

	CD #	Document #	Item	State #	Customer #	Types	Weight	Received	Destroyed	Drum Srl Num
							• • • • • • •			
	138983	J4327	1	NYG1048293	00319	DM	497	08/08/2000	09/17/2000	GMA-1
	138983	J4327	2	NYG1048293	00319	DM	486	08/08/2000	09/15/2000	GMA-2
-	138983	J4327	3	NYG1048293	00319	DM	469	08/08/2000	09/15/2000	GMA-3
	138983	J4327	4	NYG1048293	00319	DM	469	08/08/2000	09/15/2000	GMA-4
	138983	J4327	5	NYG1048293	00319	DM	458	08/08/2000	09/17/2000	GMA-5
-	138983	J4327	6	NYG1048293	00319	DM	486	08/08/2000	09/15/2000	GMA-6
	138983	J4327	7	NYG1048293	00319	DM	476	08/08/2000	09/16/2000	GMA-7
	138983	J4327	8	NYG1048293	00319	DM	476	08/08/2000	09/17/2000	GMA-8
	138629	J4327	9	NYG1048293	00319	DM	450	08/08/2000	09/09/2000	
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	4. Generator's Telephone Number (5. Transporter 1 (Company Name)	315) 764-2	<u> 239</u>	MASSENA	., HT	136							
	HAROLD MARCUS		6. US EPA II M. I. T.	2 7 0	012	32			•	orter's ID		9) 695	-3734
	7 Transporter 2 (Company Name)		B. US EPA II				Ε.			orter's ID		7 912	
	9. Desighted Facility Home and Site SAFETY KLEEN, INC.		TO. US EPA	1D Number)838	51		Transp . State		Telephone ID	· (Z	024	3-4752
	11600 N. APTUS RD ARAGONITE, UT 8412	-	UT D	981	552	17	. 7 ^н	.• Facilit	y Tele;	ohone (501 ⁾	323-81	.00
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	J. Additional Descriptions for Materia	als listed Above	-			•				ng Codes f	or Wast	STAT	E
). Additional Descriptions for Materia a AP2219334; IVTP02	als listed Above	c 🛦 d 🦉			•				ng Codes f	or Wast	STAT STAT	E
	 Additional Descriptions for Materia <u>AP2219334; IWTP026</u> <u>AP2330005</u> 	ols listed Above	c A d S)4	•			landlir	ng Codes f	or Wast	STAT STAT	E
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COPY 5—Generator—Mailed by TSD Facility

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SEPTEMBER 12, 2000

Environmental Manager GENERAL MOTORS CORPORATION INLAND FISHER GUIDE ACG IFG 1000 TOWNLINE ROAD SYRACUSE, NEW YORK 13206

RE: Certificates of Disposal

_ Dear Environmental Manager:

Enclosed please find your Certificate(s) of Disposal and accompanying detailed report(s) for the waste that was shipped to our facility for treatment. Your original manifest number is referenced on both f these documents along with a Safety-Kleen Aragonite document number.

Your waste has been properly treated and the residue from this waste has been disposed of at an approved and permitted hazardous waste landfill.

Safety-Kleen appreciates you as a valued customer. If you should have any questions or concerns please do not hesitate to contact one of our customer/facility representatives at (801) 323-8100.

Sincerely

🛶 Facility Sales Manager

Enclosures



Page: 1 Certificate of Disposal - Detail Report 09/12/2000 05:40

enerator: 700578 GENERAL MOTORS CORPORATION

	CD #	Document #	Item	State #	Customer #	Types	Weight	Received	Destroyed	Drum Srl Num
	136153	J3673	1	NYG1764594	00316	DM	655	06/30/2000	07/25/2000	GMY1
-	138606	J3673	2	NYG1764594	00316	DM	614	06/30/2000	09/07/2000	GMY2
	136829	J3673	3	NYG1764594	00316	DM	463	06/30/2000	08/06/2000	GMY3
	136829	J3673	4	NYG1764594	00316	DM	437	06/30/2000	08/06/2000	GMY4
	136829	J3673	5	NYG1764594	00316	DM	437	06/30/2000	08/06/2000	GMY 5
	136829	J3673	6	NYG1764594	00316	DM	482	06/30/2000	08/06/2000	GMY 6
	138606	J3673	7	NYG1764594	00316	DM	536	06/30/2000	09/07/2000	GMY7
	136829	J3673	8	NYG1764594	00316	DM	563	06/30/2000	08/06/2000	GMY 8
مريعه	137731	J3673	9	NYG1764594	00316	DM	536	06/30/2000	08/27/2000	
	137731	J3673 .	10	NYG1764594	00316	DM	536	06/30/2000	08/27/2000	
	137308	J3673	11	NYG1764594	00316	DM	635	06/30/2000	08/13/2000	SYG1
	137308	J3673	12	NYG1764594	00316	DM	635	06/30/2000	08/13/2000	SYG2
	137308	J3673	13	NYG1764594	00316	DM	635	06/30/2000	08/13/2000	SYG3
	137308	J3673	14	NYG1764594	00316	DM	655	06/30/2000	08/12/2000	SYG4
	137308	J3673	15	NYG1764594	00316	DM	614	06/30/2000	08/12/2000	SYG5
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8,433 pds



SEPTEMBER 12, 2000

GENERAL MOTORS CORPORATION INLAND FISHER GUIDE ACG IFG 1000 TOWNLINE ROAD SYRACUSE, NEW YORK 13206

EPA ID: NYD 002 239 440

PCB

Certificate of Disposal

No. 138606

- Customer Manifest: 00316 Document: J3673 destroyed as of SEPTEMBER 07, 2000
- Lois is to certify that the hazardous material manifested to Safety-Kleen on the above Safety-Kleen Aragonite Document Number was disposed of by incineration in accordance with 40 CFR 761 (and 40 CFR 264 if applicable) as of the above certification date.

Attached is a detailed report which identifies the date(s) of disposal. Residue from this waste has been disposed of at an approved and permitted Hazardous Waste Landfill.

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

> Safety-Kleen, Aragonite UT EPA ID # UTD 981 552 177

SAFETY-KLEEN (ARAGONITE), INC.

Facility Salés Manager

RECEIVED 17/20/00 Eff

P.O. BOX 22890

SALT LAKE CITY, UT 84122-0890 801-323-8100 FAX

FAX 801-323-8877



AUGUST 28, 2000

- Environmental Manager GENERAL MOTORS CORPORATION INLAND FISHER GUIDE ACG IFG 1000 TOWNLINE ROAD SYRACUSE, NEW YORK 13206
- RE: Certificates of Disposal

Dear Environmental Manager:

- Enclosed please find your Certificate(s) of Disposal and accompanying detailed report(s) for the waste that was shipped to our facility for treatment. Your original manifest number is referenced on both of these documents along with a Safety-Kleen Aragonite document number.
- Your waste has been properly treated and the residue from this waste has been disposed of at an approved and permitted hazardous waste landfill.
- Safety-Kleen appreciates you as a valued customer. If you should have any questions or concerns please do not hesitate to contact one of our customer/facility representatives at (801) 323-8100.

Sincerely,

Facility Sales Manager Enclosures



• AUGUST 28, 2000

GENERAL MOTORS CORPORATION INLAND FISHER GUIDE ACG IFG 1000 TOWNLINE ROAD SYRACUSE, NEW YORK 13206

EPA ID: NYD 002 239 440

PCB

Certificate of Disposal

No. 137731

- Customer Manifest: 00316 Document: J3673 destroyed as of AUGUST 27, 2000
- 'his is to certify that the hazardous material manifested to Safety Kleen on the above Safety-Kleen Aragonite Document Number was disposed of by incineration in accordance with 40 CFR 761 (and 40 CFR 264 if applicable) as of the above certification date.
- Attached is a detailed report which identifies the date(s) of disposal. Residue from this waste has been disposed of at an approved and permitted Hazardous Waste Landfill.
- Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

Safety-Kleen, Aragonite UT EPA 10 # UTD 981 552 177

P.O. BOX 22890

SALT LAKE CITY, UT 84122-0890 801-323-8100

SAFETY-KLEEN (ARAGONITE), INC.

0 FAX 801-323-8877

Page: 1 Certificate of Disposal - Detail Report 08/28/2000 06:03

'enerator: 700578 GENERAL MOTORS CORPORATION

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	CD #	Document #	Item	State #	Customer #	Types	Weight	Received	Destroyed	Drum Srl Num
	136153	J3673	1	NYG1764594	00316	DM	655	06/30/2000	07/25/2000	GMY1
		J3673	2	NYG1764594	00316	DM	614	06/30/2000		GMY2
	136829	J3673	3	NYG1764594	00316	DM	463	06/30/2000	08/06/2000	GMY3
	136829	J3673	4	NYG1764594	00316	DM	437	06/30/2000	08/06/2000	GMY4
	136829	J3673	5	NYG1764594	00316	DM	437	06/30/2000	08/06/2000	GMY5
-	136829	J3673	6	NYG1764594	00316	DM	482	06/30/2000	08/06/2000	GMY 6
		J3673	7	NYG1764594	00316	DM	536	06/30/2000		GMY7
	136829	J3673	8	NYG1764594	00316	DM	563	06/30/2000	08/06/2000	GMY8
	137731	J3673	9	NYG1764594	00316	DM	536	06/30/2000	08/27/2000	
	137731	J3673	10	NYG1764594	00316	DM	536	06/30/2000	08/27/2000	
	137308	J3673	11	NYG1764594	00316	DM	635	06/30/2000	08/13/2000	SYG1
	137308	J3673	12	NYG1764594	00316	DM	635	06/30/2000	08/13/2000	SYG2
	137308	J3673	13	NYG1764594	00316	DM	635	06/30/2000	08/13/2000	SYG3
	137308	J3673	14	NYG1764594	00316	DM	655	06/30/2000	08/12/2000	SYG4
	137308	J3673	15	NYG1764594	00316	DM	614	06/30/2000	08/12/2000	SYG5
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AUGUST 16, 2000

Environmental Manager GENERAL MOTORS CORPORATION INLAND FISHER GUIDE ACG IFG 1000 TOWNLINE ROAD SYRACUSE, NEW YORK 13206

RE: Certificates of Disposal

Dear Environmental Manager:

Enclosed please find your Certificate(s) of Disposal and accompanying detailed report(s) for the waste that was shipped to our facility for treatment. Your original manifest number is referenced on both of these documents along with a Safety-Kleen Aragonite document number.

- Four waste has been properly treated and the residue from this waste has been disposed of at an approved and permitted hazardous waste landfill.
- Safety-Kleen appreciates you as a valued customer. If you should have any questions or concerns please do not hesitate to contact one of our customer/facility representatives at (801) 323-8100.

Sincerely,

Facilíty Sales Manager

Enclosures



- AUGUST 16, 2000

GENERAL MOTORS CORPORATION INLAND FISHER GUIDE ACG IFG 1000 TOWNLINE ROAD SYRACUSE, NEW YORK 13206

EPA ID: NYD 002 239 440

Ţ. 1 CD

PCB

Certificate of Disposal

No. 137308

- Customer Manifest: 00316 Document: J3673 destroyed as of AUGUST 13, 2000

his is to certify that the hazardous material manifested to Safety-Kleen on the above Safety-Kleen Aragonite Document Number was disposed of by incineration in accordance with 40 CFR 761 (and 40 CFR 264 if applicable) as of the above certification date.

Attached is a detailed report which identifies the date(s) of disposal. Residue from this waste has been disposed of at an approved and permitted Hazardous Waste Landfill.

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

Safety-Kleen, Aragonite UT EPA ID # UTD 981 552 177

Facility Sales Manager

SAFETY-KLEEN (ARAGONITE), INC. P.O. BOX 22890 SALT LAKE CITY, UT 84122-0890 801-323-8100 FAX 801-323-8877 Page: 1 Certificate of Disposal - Detail Report 08/16/2000 05:57

Generator: 700578 GENERAL MOTORS CORPORATION

-	CD #	Document #	t Item	State #	Customer #	Types	Weight	Received	Destroyed	Drum Srl Num
-	136153	J3673	1	NYG1764594	00316	DM	655	06/30/2000	07/25/2000	GMY1
		J3673	2	NYG1764594	00316	DM	614	06/30/2000		GMY2
	136829	J3673	3	NYG1764594	00316	DM	463	06/30/2000	08/06/2000	GMY3
	136829	J3673	- 4	NYG1764594	00316	DM	437	06/30/2000	08/06/2000	GMY 4
	136829	J3673	5	NYG1764594	00316	DM	437	06/30/2000	08/06/2000	GMY5
مدين .	136829	J3673	6	NYG1764594	00316	DM	482	06/30/2000	08/06/2000	GMY6
		J3673	7	NYG1764594	00316	DM	536	06/30/2000		GMY7
	136829	J3673	8	NYG1764594	00316	DM	563	06/30/2000	08/06/2000	GMY8
		J3673	9	NYG1764594	00316	DM	536	06/30/2000		
كبكي:		J3673	10	NYG1764594	00316	DM	536	06/30/2000		
	137308	J3673	11	NYG1764594	00316	DM	635	06/30/2000	08/13/2000	SYG1
	137308	J3673	12	NYG1764594	00316	DM	635	06/30/2000	08/13/2000	SYG2
	137308	J3673	13	NYG1764594	00316	DM	635	06/30/2000	08/13/2000	SYG3
	137308	J3673	14	NYG1764594	00316	DM	655	06/30/2000	08/12/2000	SYG4
	137308	J3673	15	NYG1764594	00316	DM	614	06/30/2000	08/12/2000	SYG5
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AUGUST 08, 2000

GENERAL MOTORS CORPORATION INLAND FISHER GUIDE ACG IFG 1000 TOWNLINE ROAD SYRACUSE, NEW YORK 13206

EPA ID: NYD 002 239 440

PCB

Certificate of Disposal

No. 136829

- Customer Manifest: 00316 Document: J3673 destroyed as of AUGUST 06, 2000
- his is to certify that the hazardous material manifested to Safety-Kleen on the above Safety-Kleen Aragonite Document Number was disposed of by incineration in accordance with 40 CFR 761 (and 40 CFR 264 if applicable) as of the above certification date.
- Attached is a detailed report which identifies the date(s) of disposal. Residue from this waste has been disposed of at an approved and permitted Hazardous Waste Landfill.
- Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

Safety-Kleen, Aragonite UT EPA/ID # UTD 981 552 177

Facility Sales Manager

SAFETY-KLEEN (ARAGONITE), INC.

P.O. BOX 22890 SALT LAKE CITY, UT 84122-0890 801.323.8100 FAX 801.323.8877

Page: 1 Certificate of Disposal - Detail Report 08/08/2000 12:02

Generator: 700578 GENERAL MOTORS CORPORATION

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-	CD #	Document #	Item	State #	Customer #	Types	Weight	Received	Destroyed	Drum Srl Num
	136153	J3673	1	NYG1764594	00316	 DM	655	06/30/2000	07/25/2000	GMY1
		J3673	2	NYG1764594	00316	DM	614	06/30/2000		GMY2
	136829	J3673	3	NYG1764594	00316	DM	463	06/30/2000	08/06/2000	GMY3
	136829	J3673	4	NYG1764594	00316	DM	437	06/30/2000	08/06/2000	GMY4
	136829	J3673	5	NYG1764594	00316	DM	437	06/30/2000	08/06/2000	GMY5
-	136829	J3673	6	NYG1764594	00316	DM	482	06/30/2000	08/06/2000	GMY6
		J3673	7	NYG1764594	00316	DM	536	06/30/2000		GMY7
	136829	J3673	8	NYG1764594	00316	DM	563	06/30/2000	08/06/2000	GMY8
		J3673	9	NYG1764594	00316	DM	536	06/30/2000		
		J3673	10	NYG1764594	00316	DM	536	06/30/2000		
		J3673	11	NYG1764594	00316	DM	635	06/30/2000		SYG1
		J3673	12	NYG1764594	00316	DM	635	06/30/2000		SYG2
-		J3673	13	NYG1764594	00316	DM	635	06/30/2000		SYG3
		J3673	14	NYG1764594	00316	DM	655	06/30/2000		SYG4
		J3673	15	NYG1764594	00316	DM	614	06/30/2000		SYG5
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AZARDOUS WASTE MANIFEST D. Box 12820, Albany, New York 12212

DEPARTMENT OF ENVIRONMENTAL CONSERVATION DIVISION OF SOLID & HAZARDOUS MATERIALS

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T	UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's L		Manifest Da		Page 1 of	Information is not requir		eavy bold line deral Law.		
		H T D O O	223944	4 9 9 9 1	7.4	2					
-:	3.Generator's Name and Mailing Add	1 GI	ND FISHER G	S DR	۸.		G 176	458	15		
	4. Generator's Telephone Number (licuse, ny 1. - <u>5000</u>	•	8.	Generator's					
1	5. Transporter 1 (Company Name)		6. US EPA ID Numbe			State Transp		27-	24ANY		
	TOBANARDA TARK TRAR	SPORT	ATD09				s Telephone (606)	888-8265/		
	7 Transporter 2 (Company Name)		8. US EPA ID Numbe			State Transp					
	BORPGLK-SOUTHERE		VADOO		<u>v a</u>	<u> </u>	Telephone (800	635-5768		
	 Designated Facility Name and Site SAFETY-KLEEN, IFC. MILES E. 7 MILES 1 	(GRAYBACK	10 US EPA ID Numi	ber		State Facilit					
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	15. Special Handling Instructions and Additional Information										
	ACCURULATION START DATE: 4/6/00 DEFERGENCY RESPONSE: 1-800-424-8802 BOLL-OFF ID: UPCH 410656 LOCAL RESPONSE: 315-432-5000										
	16. GENERATOR'S CERTIFICATION and are classified, packed, marked a natianal government regulations and If I am a large quantity generator, I to be economically practicoble and the table of the second se	ind labeled, and a I state laws and re certify that I have	are in all respects in p egulations. a program in place to	roper condition for reduce the volue	or transport	t by highway icity of waste	according to	applicable	e internatianal and ee I have determine		
	present and future threat to human h generation and select the best waste	health and the en	vironment; OR if I am	a small quantity	generator,	l have made	a good faith	effort ta	minimize my waste		
	Printed/Typed Name BRADILY & KUBIAK		Signature/	Ry A.K.	Jul .	[Jan	THE A	1.4	Day J Sil		
IKANSPUKIEK	17. Transporter 1 Acknowledgement Printed/Typed Name	ten	Signature	lan,	Eni	tin	l	Mo.	Day Yea		
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-	19. Discrepancy Indication Space	1	i		ECEI	第 D			2.112		
FACILITY	20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.										
Ŭ ¥Ŭ		minication of receip		ials covered by t	nis manifes	r except as n			Day Yea		
-	Printed/Typed Name		Signature	$\left(- \lambda \right)$	11	- _	I	Mo.			
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COPY 5---Generator---Mailed by TSD Facility

l	UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)	N Y D O O 2 2 3 9 4	Manifest Documer 4 0 0 0 1 7 4		22. Pa 2	are law	as is no	•	ed by Federal
	23. Generator's Name	INLAND FISHER GUIDE 1 GENERAL MOTORS DR SYRACUSE, NY 13206				e Manifest <u>NYG17</u> te Genera	<u>6458</u>	5	nber
ĺ	24. Transporter <u>3</u> Company Narr BURLINCTON NORTHERN 26. Transporter <u>4</u> Company Narr	UPRR MMINI	D 200 / 2 9 2 5 / 0 25. US EPA ID Number D 0 4 8 3 4 4 27. US EPA ID Number	-7-81	O. Tra	nsporter's	Phone	80074	-27/-4 69-2673 (0 -872-0
	MP ENVIRONMENTAL MC	CNHOC MCA!		247	Q. Tra	nsporter's	Phone	8886	37-8009 A
	28.US DOT Description (Including Pr	oper Shipping Name, Hazard Class an	JIDNumber) 74	29. Cont No.	ainers Type	30 Tot Quar	al ntitv	31. Unit Wt/Vol	R. Waste N
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	S. Additional Descriptions for Material ROLL-OFF_TD-U	PCV 410656			T. Ha	ndling Co	des for	Wastes	Listed Above
	32. Special Handing Instructions and	Additional Information							Date
RANSPORTER	Printed/Typed Name UPILL 34. Transporter <u>4</u> Acknowledger	nent of Receipt of Materials	Signature						Month Day
ATER F	Printed Typed Name NEAL & DYW 35. Discrepancy Indication Space		Signature	1.0	2				Month Day
Ĉ				\bigcirc					

Safety-Kleen (Lone & Grassy Mountain), Inc. Grassy Mountain Facility 3 mi. East, 7 mi. North of Exit 41* Clive UT EPA ID # - UTD991301748

As required by 40 CFR 761.218 (a), we are providing this Certificate of Disposal to INLAND FISHER GUIDE DIVISION O to confirm that load # 2000002472

LINE	PROFILE No.	WASTE NAME	WEIGHT Kg TYPE	DISPOSAL CELL	D I SPOSED
1/A	GB92-0408	130576 PCB DEBRIS, AND/OR RAGS	7129.25 BULK	CZ /F8 /7	05/15/00

shipped on manifest number NYD002239440-00174 was/were disposed in an EPA approved chemical waste landfill.

Under civil and criminal penalties of law for the making or submission of false or fraudulant statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the person who, acting under my direct instructions, made the verification that this information is true, accurate and complete.

Cert. # 011875

Safety-Kleen (Lone and Grassy Mountain), Inc., Grassy Mountain Facility EPA ID# UTD991301748

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Gary Mossor, General Manager

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			SYRACUS	e, NY 13206	i		B. Genero			
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ij		7 Transporter 2 (Company Name)		US EPA ID Number	0440			ransporter's ID	716	873-9703
Ser		McForland & Hulling	1	LTD 680	د <i>د</i> ی ک			•	420 10	382-0103
8	F	9. Designated Facility Name and Site	A				G. State I		<u>רי כבי </u>	552-0105
		SAFETY-KLEEN, INC.								
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- To		OFE I-80 CLIVE, UT		птр 9 9 1	3017	4 8				
Environmental Conservation (518)	Γ	11. US DOT Description (Including Pr	oper Shipping Name	, Hozard Class and I	D Number)		ntainers	13. Total	14. Unit	
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424-8802		J. Additional Descriptions for Materia PCB_DEB					КН	londling Codes for	r Wastes L	isted Above
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er 🤅		ь		d		i	ь		Ь	
Center		15. Special Handling Instructions and	Additional Informa	tion						
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call the National Response	ļļ	14 GENERATORS CERTIFICATION	I have here the stars of			killer		-taba described ab		
		 GENERATOR'S CERTIFICATION: and are classified, packed, marked and 	nd labeled, and are i	in all respects in prop						
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.=	200	DAVID ATTE 18. Transporter 2 Acknowledgement		1 Dans	200	Da	<u> </u>	L	04	0 5 0 0
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20. Facility Owner or Operator: Certification of receipt of hazardous roateries covered by this manifest except as noted in Item 19.
Printed/Types Name In case of emerg Printed/Typed Nan Signature

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COPY 1-Disposer State-Mailed by TSD Facility

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Day

Year

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Safety-Kleen (Lone & Grassy Mountain), Inc. Grassy Mountain Facility 3 mi. East, 7 mi. North of Exit 41* Clive UT EPA ID # - UTD991301748

As required by 40 CFR 761.218 (a), we are providing this Certificate of Disposal to INLAND FISHER GUIDE DIVISION O to confirm that load # 2000002040

LINE	PROFILE No.	WASTE NAME	WEIGHT Kg TYPE	DISPOSAL CELL	D I SPOSED
1/A	GB92-0408	130576 PCB DEBRIS, AND/OR RAGS	8344.67 BULK	CB /D8 /1	04/26/00

shipped on manifest number NYD002239440-00171 was/were disposed in an EPA approved chemical waste landfill.

Under civil and criminal penalties of law for the making or submission of false or fraudulant statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the person who, acting under my direct instructions, made the verification that this information is true, accurate and complete.

Cert. # 011781

Safety-Kleen (Lone and Grassy Mountain), Inc., Grassy Mountain Facility EPA ID# UTD991301748

mond 0 0

Gary Mossor, General Manager

, Please type or print. Do not staple

STATE OF NEW YORK DEPARTMENT OF ENVIRONMENTAL CONSERVATION DIVISION OF SOLID & HAZARDOUS MATERIALS

HAZARDOUS WASTE MANIFEST P.O. Box 12820, Albany, New York 12212



		WASTE MANIFEST	 Generator's US I 		Manifest D		2. Poge			neavy bold line ederal Law.		
162	$\left \right $	3.Generator's Name and Mailing Add		2 3 9 4 4 0 FISHER GUID		5 1	2					
457-7362		5. Generator 3 realize and Maning Add	I GENE	ľ		NYG 176	6455	58				
45			SYRACI	8	B. Generator's ID							
18		4. Generator's Telephone Number (315) 432-500			SAME						
<u>u</u>		5. Transporter 1 (Company Name)	6.		C. State Transporter's ID / 3374/14 NY							
iti	╞	BUFFALO FUEL CORP 7 Transporter 2 (Company Name)		<u>IYR0000</u> USEPAID Number	457		D. Transporter's Telephone 800) 677–8008 E. State Transporter's ID					
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STATE OF NEW YORK DEPARTMENT OF ENVIRONMENTAL CONSERVATION DIVISION OF SOLID & HAZARDOUS MATERIALS

HAZARDOUS WASTE MANIFEST P.O. Box 12820, Albany, New York 12212



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Safety-Kleen (Lone & Grassy Mountain), Inc. Grassy Mountain Facility 3 mi. East, 7 mi. North of Exit 41* Clive UT EPA ID # - UTD991301748

As required by 40 CFR 761.218 (a), we are providing this Certificate of Disposal to <u>INLAND FISHER GUIDE DIVISION O</u> to confirm that load # 2000001302

LINE	PROFILE No.	WASTE NAME	WEIGHT Kg TYPE	DISPOSAL CELL	DISPOSED
1/A	GB92-0408	130576 PCB DEBRIS, AND/OR RAGS	9768.71 BULK	CB /F10 /1	03/16/00

shipped on manifest number NYD002239440-00151 was/were disposed in an EPA approved chemical waste landfill.

Under civil and criminal penalties of law for the making or submission of false or fraudulant statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the person who, acting under my direct instructions, made the verification that this information is true, accurate and complete.

Cert. # 011278

Safety-Kleen (Lone and Grassy Mountain), Inc., Grassy Mountain Facility EPA ID# UTD991301748

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Gary Mossor, General Manager

STATE OF NEW YORK DEPARTMENT OF ENVIRONMENTAL CONSERVATION DIVISION OF SOLID & HAZARDOUS MATERIALS

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Safety-Kleen (Lone & Grassy Mountain), Inc. Grassy Mountain Facility 3 mi. East, 7 mi. North of Exit 41* Clive UT EPA ID # - UTD991301748 As required by 40 CFR 761.218 (a), we are providing this Certificate of Disposal to INLAND FISHER GUIDE DIVISION O to confirm that load # 2000001346

LINE	LINE PROFILE No. W	WASTE NAME	AME		WEIGHT Kg	TYPE	WEIGHT Kg TYPE DISPOSAL CELL	DISPOSED
1/A	GB92-0408	130576	PCB DEBRIS	130576 PCB DEBRIS, AND/OR RAGS	9768.71	BULK	9768.71 BULK CB /F10 /1	03/21/00

shipped on manifest number <u>NYD002239440-00150</u> was/were disposed in an EPA approved chemical waste landfill.

Under civil and criminal penalties of law for the making or submission of false or fraudulant statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the person who, acting under my direct instructions, made the verification that this information is true, accurate and complete.

Cert. # 011409

Safety-Kleen (Lone and Grassy Mountain), Inc., Grassy Mountain Facility EPA ID# UTD991301748

rest in Present

Gary Mossor, General Manager

EXHIBIT B

NYSDEC approval letters for facility cleaning IRM work in leasehold spaces

New York State Department of Environmental Conservation

Division of Environmental Remediation Jureau of Central Remedial Action, Room 228 50 Wolf Road, Albany, New York 12233-7010 Phone: (518) 457-1741 • FAX: (518) 457-7925 Website: www.dec.state.ny.us



April 30, 2001

James Hartnett General Motors Corporation Remediation Project Office Rte 37, Box 460 Massena, NY 13662-0460

Re: General Motors- Former Inland Fisher Guide Facility/ Ley Creek Deferred Media Site Administrative Order on Consent Index # D-7-0001-97-06 Redevelopment Notice for Restricted Activity within the Manufacturing Building HMQ Metal Finishing Sanitary Sewer Connection and Sump Installation (Notice # 22)

Dear Mr. Hartnett:

The Department has reviewed the Redevelopment Notice #22 submitted on March 29, 2001 for the proposed HMQ Metal Finishing area. This restricted activity is approved as an Interim Remedial Measure (IRM) in accordance with Paragraph II.B of the Consent Order Addendum. The Redevelopment Notice is hereby incorporated into the Consent Order Addendum executed under the above-referenced Index number.

This sewer connection and sump installation is now an IRM Remedial Measure and such activity must be performed in accordance with the IRM provisions in the Consent Order. The Generic Work Plan will constitute the environmental work plan for this activity, thus an additional IRM work plan will not be necessary to cover the described scope of work.

The Certification of Completion provided for this area which confirms that the area to be used was cleaned either under the 1997 cleaning program or in accordance with the Facility Cleaning IRM Work Plans and to the cleanup requirement or sealing requirements specified for the IRM work, is approved. However, as bay D7 and portions of bays D6, D8, D10 and D11 were not accessible for cleaning, as indicated by GM, these uncleaned or sealedareas must be restricted from access by HMQ personnel.

Sincerely,

Susan L. Benjamin Project Manager

cc: L. Fitzpatrick N. Tupiak B. Kogut C. Leary