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GENERAL ELECTRIC

Buffalo Service Shop

NEW YORK STATE

DEPT. OF ENVIRONMENTAL CONSERVATION

6 NYC RR Part 360

HAZARDOUS WASTE STORAGE

PERMIT APPLICATION

Submitted by: GENERAL ELECTRIC COMPANY

175 Milens Road

Tonawanda, New York 14150

Mr. P.J. Desmarais, Manager

Prepared by: A. Hejmanowski, Electrical Planning Specialist

General Electric

Tonawanda, New York

B. York, Environmental Engineering

General Electric

Schenectady, New York

Revised: March 24, 1984

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EAF

A. ENVIRONMENTAL ASSESSMENT FORM

GENERAL ELECTRIC COMPANY
175 Milens Road
Tonawanda, New York 14150

APPENDIX A

EAF

ENVIRONMENTAL ASSESSMENT - PART I

Project Information

NOTICE: This document is designed to assist in determining whether the action proposed may have a significant effect on the environment. Please complete the entire Data Sheet. Answers to these questions will be considered as part of the application for approval and may be subject to further verification and public review. Provide any additional information you believe will be needed to complete PARTS 2 and 3.

It is expected that completion of the EAF will be dependent on information currently available and will not involve new studies, research or investigation. If information requiring such additional work is unavailable, so indicate and specify each instance.

NAME OF PROJECT:

Hazardous Waste Storage

NAME AND ADDRESS OF OWNER (If Different)

(Name)

(Street)

(P.O.) (State) (Zip)

BUSINESS PHONE:

ADDRESS AND NAME OF APPLICANT:

General Electric
(Name)

175 Milens Road
(Street)

Tonawanda, N.Y. 14150
(P.O.) (State) (Zip)

DESCRIPTION OF PROJECT: (Briefly describe type of project or action)

Storage of RCRA hazardous wastes and PCB's,
DEC hazardous wastes B001 thru B011.

(PLEASE COMPLETE EACH QUESTION - Indicate N.A. if not applicable)

A. SITE DESCRIPTION

(Physical setting of overall project, both developed and undeveloped areas)

1. General character of the land: Generally uniform slope ✓ Generally uneven and rolling or irregular ____.

2. Present land use: Urban ____, Industrial ✓, Commercial ____, Suburban ____, Rural ____, Forest ____, Agriculture ____, Other ____.

3. Total acreage of project area: 5.3 acres.

Approximate acreage:	Presently	After Completion		Presently	After Completion
Meadow or Brushland	____acres	____acres	Water Surface Area	____acres	____acres
Forested	____acres	____acres	Unvegetated (rock, earth or fill)	____acres	____acres
Agricultural	____acres	____acres	Roads, buildings and other paved surfaces	4.3 acres	4.3 acres
Wetland (Freshwater or Tidal as per Articles 24, 25 or F.C.L.)	____acres	____acres	Other (indicate type)	1 acres	1 acres

4. What is predominant soil type(s) on project site? GRASS COMPACT CLAYEY SILT

5. a. Are there bedrock outcroppings on project site? ____ Yes ✓ No

b. What is depth to bedrock? UNKNOWN (In feet)

Test borings to 56 ft did not encounter refusal.

6. Approximate percentage of proposed project site with slopes: 0-10% ✓ %; 10-15% ____%; 15% or greater ____%.

7. Is project contiguous to, or contain a building or site listed on the National Register of Historic Places? ____Yes ✓No

8. What is the depth to the water table? 22 feet

9. Do hunting or fishing opportunities presently exist in the project area? ____Yes ✓No

10. Does project site contain any species of plant or animal life that is identified as threatened or endangered - ____Yes ✓No, according to - Identify each species _____

_____

11. Are there any unique or unusual land forms on the project site? (i.e. cliffs, dunes, other geological formations - ____Yes ✓No. (Describe _____)

12. Is the project site presently used by the community or neighborhood as an open space or recreation area - ____Yes ✓No.

13. Does the present site offer or include scenic views or vistas known to be important to the community? ____Yes ✓No

14. Streams within or contiguous to project area: NONE

a. Name of stream and name of river to which it is tributary _____

_____

15. Lakes, Ponds, Wetland areas within or contiguous to project area: NONE

a. Name _____; b. Size (in acres) _____

16. What is the dominant land use and zoning classification within a 1/4 mile radius of the project (e.g. single family residential, R-2) and the scale of development (e.g. 2 story). Industrial

. PROJECT DESCRIPTION

1. Physical dimensions and scale of project (fill in dimensions as appropriate) 2,000 square feet

a. Total contiguous acreage owned by project sponsor 5.3 acres.

b. Project acreage developed: 0.05 acres initially; 0.05 acres ultimately.

c. Project acreage to remain undeveloped _____.

d. Length of project, in miles: _____(if appropriate)

e. If project is an expansion of existing, indicate percent of expansion proposed: building square footage _____; developed acreage _____.

f. Number of off-street parking spaces existing 150; proposed 150.

g. Maximum vehicular trips generated per hour N/A (upon completion of project)

h. If residential: Number and type of housing units:

	One Family	Two Family	Multiple Family	Condominium
Initial				
Ultimate				

i. If:

	Orientation Neighborhood-City-Regional	Estimated Employment
Commercial		
Industrial		

j. Total height of tallest proposed structure N/A feet.

2. How much natural material (i.e. rock, earth, etc.) will be removed from the site - NONE tons

_____ cubic yards.

3. How many acres of vegetation (trees, shrubs, ground covers) will be removed from site - NONE acres.

4. Will any mature forest (over 100 years old) or other locally-important vegetation be removed by this project? ____Yes ✓No

5. Are there any plans for re-vegetation to replace that removed during construction? ____Yes ____No

6. If single phase project: Anticipated period of construction ____months, (including demolition). N/A

7. If multi-phased project: a. Total number of phases anticipated ____No. N/A

b. Anticipated date of commencement phase 1 ____month ____year (including demolition)

c. Approximate completion date final phase _____month ____year.

d. Is phase 1 financially dependent on subsequent phases? ____Yes ____No

8. Will blasting occur during construction? ____Yes ____No

9. Number of jobs generated: during construction ____; after project is complete ____.

10. Number of jobs eliminated by this project ____.

11. Will project require relocation of any projects or facilities? ____Yes ✓No. If yes, explain:

_____.

12. a. Is surface or subsurface liquid waste disposal involved? ____Yes ✓No.

b. If yes, indicate type of waste (sewage, industrial, etc.) _____.

c. If surface disposal name of stream into which effluent will be discharged _____.

13. Will surface area of existing lakes, ponds, streams, bays or other surface waterways be increased or decreased by proposal? ____Yes ✓No.

14. Is project or any portion of project located in the 100 year flood plain? ____Yes ✓No

15. a. Does project involve disposal of solid waste? ✓Yes ____No

b. If yes, will an existing solid waste disposal facility be used? ✓Yes ____No

c. If yes, give name: CECOS ; location NIAGARA FALLS, NY.

d. Will any wastes not go into a sewage disposal system or into a sanitary landfill? ✓Yes ____No

16. Will project use herbicides or pesticides? ____Yes ✓No

17. Will project routinely produce odors (more than one hour per day)? ____Yes ✓No

18. Will project produce operating noise exceeding the local ambience noise levels? ____Yes ✓No

19. Will project result in an increase in energy use? ____Yes ✓No. If yes, indicate type(s) _____

_____.

20. If water supply is from wells indicate pumping capacity _____ gals/minute.

21. Total anticipated water usage per day _____gals/day.

22. Zoning: a. What is dominant zoning classification of site? INDUSTRIAL.

b. Current specific zoning classification of site INDUSTRIAL.

c. Is proposed use consistent with present zoning? YES.

d. If no, indicate desired zoning _____.

26. Approvals: a. Is any Federal permit required? ____Yes ✓ No

b. Does project involve State or Federal funding or financing? ___Yes ✓ No

c. Local and Regional approvals:

	Approval Required (Yes, No)	(Type)	Submittal (Date)	Approval (Date)
City, Town, Village Board	NO			
City, Town, Village Planning Board	NO			
City, Town, Zoning Board	NO			
City, County Health Department	NO			
Other local agencies	NO			
Other regional agencies	NO			
State Agencies	YES			
Federal Agencies			11/80	11/80

C. INFORMATIONAL DETAILS

Attach any additional information as may be needed to clarify your project. If there are or may be any adverse impacts associated with the proposal, please discuss such impacts and the measures which can be taken to mitigate or avoid them.

PREPARER'S SIGNATURE: Barry N. York

TITLE: Environmental Engineering

REPRESENTING: General Electric

DATE: 8-26-83

ENVIRONMENTAL ASSESSMENT - PART II

Project Impacts and Their Magnitude

General Information (Read Carefully)

- In completing the form the reviewer should be guided by the question: Have my decisions and determinations been reasonable? The reviewer is not expected to be an expert environmental analyst.
- Identifying that an effect will be potentially large (column 2) does not mean that it is also necessarily significant. Any large effect must be evaluated in PART 3 to determine significance. By identifying an effect in column 2 simply asks that it be looked at further.
- The Examples provided are to assist the reviewer by showing types of effects and wherever possible the threshold of magnitude that would trigger a response in column 2. The examples are generally applicable throughout the State and for most situations. But, for any specific project or site other examples and/or lower thresholds may be more appropriate for a Potential Large Impact rating.
- Each project, on each site, in each locality, will vary. Therefore, the examples have been offered as guidance. They do not constitute an exhaustive list of impacts and thresholds to answer each question.
- The number of examples per question does not indicate the importance of each question.

INSTRUCTIONS (Read Carefully)

a. Answer each of the 18 questions in PART 2. Answer Yes if there will be any effect.

b. Maybe answers should be considered as Yes answers.

c. If answering Yes to a question then check the appropriate box (column 1 or 2) to indicate the potential size of the impact. If impact threshold equals or exceeds any example provided, check column 2. If impact will occur but threshold is lower than example, check column 1.

d. If reviewer has doubt about the size of the impact then consider the impact as potentially large and proceed to PART 3.

e. If a potentially large impact or effect can be reduced by a change in the project to a less than large magnitude, place a Yes in column 3. A No response indicates that such a reduction is not possible.

	NO	YES	1. SMALL TO MODERATE IMPACT	2. POTENTIAL LARGE IMPACT	3. CAN IMPACT BE REDUCED BY PROJECT CHANGE
IMPACT ON LAND					
1. WILL THERE BE AN EFFECT AS A RESULT OF A PHYSICAL CHANGE TO PROJECT SITE?	⊗	○			
Examples that Would Apply to Column 2					
___ Any construction on slopes of 15% or greater, (15 foot rise per 100 foot of length), or where the general slopes in the project area exceed 10%.			___	___	___
___ Construction on Land where the depth to the water table is less than 3 feet.			___	___	___
___ Construction of paved parking area for 1,000 or more vehicles.			___	___	___
___ Construction on land where bedrock is exposed or generally within 3 feet of existing ground surface.			___	___	___
___ Construction that will continue for more than 1 year or involve more than one phase or stage.			___	___	___
___ Excavation for mining purposes that would remove more than 1,000 tons of natural material (i.e. rock or soil) per year.			___	___	___
___ Construction of any new sanitary landfill.			___	___	___

		1. SMALL TO MODERATE IMPACT	2. POTENTIAL LARGE IMPACT	3. CAN IMPACT BE REDUCED BY PROJECT CHANGE
___	Construction in a designated floodway.	___	___	___
___	Other impacts: _____	___	___	___
	_____	___	___	___
2.	WILL THERE BE AN EFFECT TO ANY UNIQUE OR UNUSUAL LAND FORMS FOUND ON THE SITE? (i.e. cliffs, dunes, geological formations, etc.) NO ⊗ YES ○			
___	Specific land forms: _____	___	___	___
	_____	___	___	___
	IMPACT ON WATER			
3.	WILL PROJECT AFFECT ANY WATER BODY DESIGNATED AS ..... PROTECTED? (Under Articles 15, 24, 25 of the Environmental Conservation Law, E.C.L.) NO ⊗ YES ○			
	Examples that Would Apply to Column 2			
___	Dredging more than 100 cubic yards of material from channel of a protected stream.	___	___	___
___	Construction in a designated freshwater or tidal wetland.	___	___	___
___	Other impacts: _____	___	___	___
	_____	___	___	___
4.	WILL PROJECT AFFECT ANY NON-PROTECTED EXISTING OR NFH BODY OF WATER? ..... NO ⊗ YES ○			
	Examples that Would Apply to Column 2			
___	A 10% increase or decrease in the surface area of any body of water or more than a 10 acre increase or decrease.	___	___	___
___	Construction of a body of water that exceeds 10 acres of surface area.	___	___	___
___	Other impacts: _____	___	___	___
	_____	___	___	___
5.	WILL PROJECT AFFECT SURFACE OR GROUNDWATER QUALITY? NO ○ YES ⊗			
	Examples that Would Apply to Column 2			
___	Project will require a discharge permit.	___	___	___
___	Project requires use of a source of water that does not have approval to serve proposed project.	___	___	___
___	Project requires water supply from wells with greater than 45 gallons per minute pumping capacity.	___	___	___
✓	Construction or operation causing any contamination of a public water supply system.	✓	___	___
✓	Project will adversely affect groundwater.	✓	___	___
___	Liquid effluent will be conveyed off the site to facilities which presently do not exist or have inadequate capacity.	___	___	___
___	Project requiring a facility that would use water in excess of 20,000 gallons per day.	___	___	___
___	Project will likely cause siltation or other discharge into an existing body of water to the extent that there will be an obvious visual contrast to natural conditions.	___	___	___

	1. SMALL TO MODERATE IMPACT	2. POTENTIAL LARGE IMPACT	3. CAN IMPACT BE REDUCED BY PROJECT CHANGE
___ Other Impacts: _____	___	___	___
_____	___	___	___
6. WILL PROJECT ALTER DRAINAGE FLOW, PATTERNS OR SURFACE WATER RUNOFF? ..... NO ⊗ YES ○			
Example that Would Apply to Column 2			
___ Project would impede flood water flows.	___	___	___
___ Project is likely to cause substantial erosion.	___	___	___
___ Project is incompatible with existing drainage patterns.	___	___	___
___ Other impacts: _____	___	___	___
IMPACT ON AIR			
7. WILL PROJECT AFFECT AIR QUALITY?..... NO ⊗ YES ○			
Examples that Would Apply to Column 2			
___ Project will induce 1,000 or more vehicle trips in any given hour.	___	___	___
___ Project will result in the incineration of more than 1 ton of refuse per hour.	___	___	___
___ Project emission rate of all contaminants will exceed 5 lbs. per hour or a heat source producing more than 10 million BTU's per hour.	___	___	___
___ Other impacts: _____	___	___	___
_____	___	___	___
IMPACT ON PLANTS AND ANIMALS			
8. WILL PROJECT AFFECT ANY THREATENED OR ENDANGERED SPECIES? NO ⊗ YES ○			
Examples that Would Apply to Column 2			
___ Reduction of one or more species listed on the New York or Federal list, using the site, over or near site or found on the site.	___	___	___
___ Removal of any portion of a critical or significant wildlife habitat.	___	___	___
___ Application of Pesticide or herbicide over more than twice a year other than for agricultural purposes.	___	___	___
___ Other impacts: _____	___	___	___
_____	___	___	___
9. WILL PROJECT SUBSTANTIALLY AFFECT NON-THREATENED OR ENDANGERED SPECIES? ..... NO ⊗ YES ○			
Example that Would Apply to Column 2			
___ Project would substantially interfere with any resident or migratory fish or wildlife species.	___	___	___
___ Project requires the removal of more than 10 acres of mature forest (over 100 years in age) or other locally important vegetation.	___	___	___

			1. SMALL TO MODERATE IMPACT	2. POTENTIAL LARGE IMPACT	3. CAN IMPACT BE REDUCED BY PROJECT CHANGE
	IMPACT ON VISUAL RESOURCE				
10.	WILL THE PROJECT AFFECT VIEWS, VISTAS OR THE VISUAL CHARACTER OF THE NEIGHBORHOOD OR COMMUNITY?	NO ⊗ YES ○			
	Examples that Would Apply to Column 2				
___	An incompatible visual affect caused by the introduction of new materials, colors and/or forms in contrast to the surrounding landscape.		___	___	___
___	A project easily visible, not easily screened, that is obviously different from others around it.		___	___	___
___	Project will result in the elimination or major screening of scenic views or vistas known to be important to the area.		___	___	___
___	Other impacts: _____		___	___	___
	_____		___	___	___
	IMPACT ON HISTORIC RESOURCES				
11.	WILL PROJECT IMPACT ANY SITE OR STRUCTURE OF HISTORIC, PRE-HISTORIC OR PALEONTOGICAL IMPORTANCE?	NO ⊗ YES ○			
	Examples that Would Apply to Column 2				
___	Project occuring wholly or partially within or contiguous to any facility or site listed on the National Register of historic places.		___	___	___
___	Any impact to an archeological site or fossil bed located within the project site.		___	___	___
___	Other impacts: _____		___	___	___
	_____		___	___	___
	IMPACT ON OPEN SPACE & RECREATION				
12.	WILL THE PROJECT AFFECT THE QUANTITY OR QUALITY OF EXISTING OR FUTURE OPEN SPACES OR RECREATIONAL OPPORTUNITIES?.....	NO ⊗ YES ○			
	Examples that Would Apply to Column 2				
___	The permanent foreclosure of a future recreational opportunity.		___	___	___
___	A major reduction of an open space important to the community.		___	___	___
___	Other impacts: _____		___	___	___
	_____		___	___	___
	IMPACT ON TRANSPORTATION				
13.	WILL THERE BE AN EFFECT TO EXISTING TRANSPORTATION SYSTEMS?	NO ⊗ YES ○			
	Examples that Would Apply to Column 2				
___	Alteration of present patterns of movement of people and/or goods.		___	___	___
___	Project will result in severe traffic problems.		___	___	___
___	Other impacts: _____		___	___	___
	_____		___	___	___

		NO	YES	1 SMALL TO MODERATE IMPACT	2 POTENTIAL LARGE IMPACT	3 CAN IMPACT BE REDUCED BY PROJECT CHANGE
	IMPACT ON ENERGY					
14.	WILL PROJECT AFFECT THE COMMUNITIES SOURCES OF FUEL OR ENERGY SUPPLY?	⊗	○			
	Examples that Would Apply to Column 2					
___	Project causing greater than 5% increase in any form of energy used in municipality.			___	___	___
___	Project requiring the creation or extension of an energy transmission or supply system to serve more than 50 single or two family residences.			___	___	___
___	Other impacts: _____			___	___	___
	_____			___	___	___
	IMPACT ON NOISE					
15.	WILL THERE BE OBJECTIONABLE ODORS, NOISE, GLARE, VIBRATION or ELECTRICAL DISTURBANCE AS A RESULT OF THIS PROJECT?	⊗	○			
	Examples that Would Apply to Column 2					
___	Blasting within 1,500 feet of a hospital, school or other sensitive facility.			___	___	___
___	Odors will occur routinely (more than one hour per day).			___	___	___
___	Project will produce operating noise exceeding the local ambient noise levels for noise outside of structures.			___	___	___
___	Project will remove natural barriers that would act as a noise screen.			___	___	___
___	Other impacts: _____			___	___	___
	_____			___	___	___
	IMPACT ON HEALTH & HAZARDS					
16.	WILL PROJECT AFFECT PUBLIC HEALTH AND SAFETY?	○	⊗			
	Examples that Would Apply to Column 2					
✓	Project will cause a risk of explosion or release of hazardous substances (i.e. oil, pesticides, chemicals, radiation, etc.) in the event of accident or upset conditions, or there will be a chronic low level discharge or emission.			✓	___	___
___	Project that will result in the burial of "hazardous wastes" (i.e. toxic, poisonous, highly reactive, radioactive, irritating, infectious, etc., including wastes that are solid, semi-solid, liquid or contain gases.)			___	___	___
___	Storage facilities for one million or more gallons of liquified natural gas or other liquids.			___	___	___
___	Other impacts: _____			___	___	___
	_____			___	___	___

	NO	YES	SMALL TO MODERATE IMPACT	POTENTIAL LARGE IMPACT	CAN IMPACT BE REDUCED BY PROJECT CHANGE
IMPACT ON GROWTH AND CHARACTER OF COMMUNITY OR NEIGHBORHOOD					
17. WILL PROJECT AFFECT THE CHARACTER OF THE EXISTING COMMUNITY?	⊗	○			
Example that Would Apply to Column 2					
___ The population of the City, Town or Village in which the project is located is likely to grow by more than 5% of resident human population.			___	___	___
___ The municipal budgets for capital expenditures or operating services will increase by more than 5% per year as a result of this project.			___	___	___
___ Will involve any permanent facility of a non-agricultural use in an agricultural district or remove prime agricultural lands from cultivation.			___	___	___
___ The project will replace or eliminate existing facilities, structures or areas of historic importance to the community.			___	___	___
___ Development will induce an influx of a particular age group with special needs.			___	___	___
___ Project will set an important precedent for future projects.			___	___	___
___ Project will relocate 15 or more employees in one or more businesses.			___	___	___
___ Other impacts: _____			___	___	___
_____			___	___	___
18. IS THERE PUBLIC CONTROVERSY CONCERNING THE PROJECT?	⊗	○			
Examples that Would Apply to Column 2					
___ Either government or citizens of adjacent communities have expressed opposition or rejected the project or have not been contacted.			___	___	___
___ Objections to the project from within the community.			___	___	___

IF ANY ACTION IN PART 2 IS IDENTIFIED AS A POTENTIAL LARGE IMPACT OR IF YOU CANNOT DETERMINE THE MAGNITUDE OF IMPACT, PROCEED TO PART 3.

PORTIONS OF EAF COMPLETED FOR THIS PROJECT:

PART I ____ PART II ____ PART 3 ____

DETERMINATION

Upon review of the information recorded on this EAF (Parts 1, 2 and 3) and considering both the magnitude and importance of each impact, it is reasonably determined that:

A. The project will result in no major impacts and, therefore, is one which may not cause significant damage to the environment. — PREPARE A NEGATIVE DECLARATION ○

B. Although the project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures described in PART 3 have been included as part of the proposed project. — PREPARE A NEGATIVE DECLARATION ○

C. The project will result in one or more major adverse impacts that cannot be reduced and may cause significant damage to the environment. — PREPARE POSITIVE DECLARATION PROCEED WITH EIS ○

8-26-83
Date

Barry N. Gale
Signature of Preparer (if different from responsible officer)

Signature of Responsible Official in Lead Agency

Print or type name of responsible official in Lead Agency

ENVIRONMENTAL ASSESSMENT - PART III

EVALUATION OF THE IMPORTANCE OF IMPACTS

INFORMATION

- Part 3 is prepared if one or more impact or effect is considered to be potentially large.
- The amount of writing necessary to answer Part 3 may be determined by answering the question: In briefly completing the instructions below have I placed in this record sufficient information to indicate the reasonableness of my decisions?

INSTRUCTIONS

Complete the following for each impact or effect identified in Column 2 of Part 2:

1. Briefly describe the impact.
2. Describe (if applicable) how the impact might be mitigated or reduced to a less than large impact by a project change.
3. Based on the information available, decide if it is reasonable to conclude that this impact is important to the minicipality (city, town or village) in which the project is located.

   To answer the question of importance, consider:

   - The probability of the impact or effect occurring
   - The duration of the impact or effect
   - Its irreversibility, including permanently lost resources or values
   - Whether the impact or effect can be controlled
   - The regional consequence of the impact or effect
   - Its potential divergence from local needs and goals
   - Whether known objections to the project apply to this impact or effect.

DETERMINATION OF SIGNIFICANCE

An action is considered to be significant if:

One (or more) impact is determined to both large and its (their) consequence, based on the review above, is important.

PART III STATEMENTS

(Continue on Attachments, as needed)

APPENDIX B

SHORT ENVIRONMENTAL ASSESSMENT FORM

INSTRUCTIONS:

(a) In order to answer the questions in this short EAF is is assumed that the preparer will use currently available information concerning the project and the likely impacts of the action. It is not expected that additional studies, research or other investigations will be undertaken.

(b) If any question has been answered Yes the project may be significant and a completed Environmental Assessment Form is necessary.

(c) If all questions have been answered No it is likely that this project is not significant.

(d) Environmental Assessment

1. Will project result in a large physical change to the project site or physically alter more than 10 acres of land? . . . . . ___ Yes ___ No

2. Will there be a major change to any unique or unusual land form found on the site? . . . . . ___ Yes ___ No

3. Will project alter or have a large effect on an existing body of water? . . . . . ___ Yes ___ No

4. Will project have a potentially large impact on groundwater quality? . . . . . ___ Yes ___ No

5. Will project significantly effect drainage flow on adjacent sites? . . . . . ___ Yes ___ No

6. Will project affect any threatened or endangered plant or animal species? . . . . . ___ Yes ___ No

7. Will project result in a major adverse effect on air quality? . . . . . ___ Yes ___ No

8. Will project have a major effect on visual character of the community or scenic views or vistas known to be important to the community? . . . ___ Yes ___ No

9. Will project adversely impact any site or structure of historic, pre-historic, or paleontological importance or any site designated as a critical environmental area by a local agency? . . . ___ Yes ___ No

10. Will project have a major effect on existing or future recreational opportunities? . . . ___ Yes ___ No

11. Will project result in major traffic problems or cause a major effect to existing transportation systems? . . . . . ___ Yes ___ No

12. Will project regularly cause objectionable odors, noise, glare, vibration, or electrical disturbance as a result of the project's operation? . ___ Yes ___ No

13. Will project have any impact on public health or safety? . . . . . ___ Yes ___ No

14. Will project affect the existing community by directly causing a growth in permanent population of more than 5 percent over a one-year period or have a major negative effect on the character of the community or neighborhood? . . ___ Yes ___ No

15. Is there public controversy concerning the project? ___ Yes ___ No

PREPARER'S SIGNATURE: _____ TITLE: _____

REPRESENTING: _____ DATE: _____

9/1/78

ENVIRONMENTAL ASSESSMENT FORM

Purpose: The EAF is designed to help applicants and agencies determine, in an orderly manner, whether a project or action is likely to be significant. The question of whether an action is significant is not always easy to answer. Frequently, there are aspects of a project that are subjective or unmeasurable. It is also understood that those who will need to determine significance will range from those with little or no formal knowledge of the environment to those who are technically expert in environmental analysis. In addition, many who have knowledge in one particular area may not be aware of the broader concerns affecting the question of significance.

The EAF is intended to provide a method whereby the preparer can be assured that the determination process has been orderly, comprehensive in nature, and yet flexible to allow the introduction of information to fit a project or action.

EAF COMPONENTS: The EAF is comprised of three parts:

Part 1: Provides objective data and information about a given project and its site. By identifying basic project data, it assists a reviewer in the analysis that takes place in Parts 2 and 3.

Part 2: This phase of the evaluation focuses on identifying the range of possible impacts that may occur from a project or action. It provides guidance as to whether an impact is likely to be considered small to moderate or whether it is a potentially-large impact. The form also identifies whether an impact can be mitigated or reduced.

Part 3: Only if any impact in Part 2 is identified as potentially-large, then Part 3 is used to evaluate whether or not the impact is actually important to the municipality in which the project is located.

Determination of Significance

If you find that one (or more) impact is both large and its consequence is important, then the project is likely to be significant, and a draft environmental impact statement should be prepared.

Scoping

If a draft EIS is needed, the Environmental Assessment Form will be a valuable tool in determining the scope of the issues to be covered by the draft EIS.

DESCRIPTION OF SERVICES AND HAZARDOUS WASTE ACTIVITIES

The General Electric Buffalo Service Shop is involved in the repair of industrial equipment including electric motors, transformers, turbines, pumps, compressors, etc.

In the performance of these repair activities, the facility generates hazardous wastes as defined in 40CFR261. A RCRA Permit Application, Part A, was submitted to the United States Environmental Protection Agency in November 1980 to obtain interim status for the storage of hazardous wastes. It has since been determined that a storage permit is not required for RCRA hazardous wastes generated at this facility and that the facility can operate as a generator with storage less than ninety days. Therefore, the General Electric Buffalo Service Shop is requesting withdrawal of its RCRA Part A Application.

The Buffalo Service Shop also receives PCB liquids, solids, and articles (New York DEC Hazardous Waste Numbers B001 through B011) from customers and other General Electric repair facilities for storage prior to shipment to qualified disposal sites. As PCB wastes are received from off site and are

included in New York hazardous management regulations, a 6 NYCRR Part 360 Permit for the storage of NYDEC hazardous waste numbers, B001 through B011, is requested.

The Buffalo Service Shop customers include industries, utilities, governmental agencies, commercial and service institutions. A representative listing of customers from whom PCB liquids, solids, and articles have been received is as follows:

Alcan
Oswego, New York

Anheuser Busch
Baldwinsville, New York

Childrens Hospital
Buffalo, New York

Columbus McKinnon
Buffalo, New York

Comstock Foods
Red Creek, New York

Conrail
Buffalo, New York

Freezer Queen
Buffalo, New York

General Electric
Bridgeport, CT
Pittsfield, MA
Schenectady, NY

National Forge
Irvine, PA

New York State (OGS)
Binghamton, New York

N.Y.S.E. & G.
Binghamton, New York

Nestles Company
Fulton, New York

PASNY
Gilboa, New York

St. Jeromes Hospital
Batavia, New York

St. Bonaventure University
Olean, New York

SUNY
Delhi, New York

Union Central School
Endicott, New York

VA Hospitals
Bedford, MA
Canandaigua, New York

The geographical area serviced by the Buffalo Service Shop for PCB storage activities is primarily New York State, Western Pennsylvania, Northeastern New Jersey, and the New England States.

Transporters used to deliver PCB liquids, solids, and articles to the Buffalo Service Shop and for shipment to disposal sites are:

CECOS International
Niagara Falls, New York
N.Y. Transporter Permit No. 9A091

S.J. Transportation
Woodstock, NY
N.Y. Transporter Permit No. NYJA044

Tonawanda Tank Transport
Buffalo, New York
N.Y. Transporter Permit No. 9A80

The Buffalo Service Shop is permitted to transport from the facility to the CECOS disposal site at Niagara Falls. The Permit Number is 9A105.

FACILITY AND OPERATION PLAN

Facility Description

The General Electric Buffalo Service Shop is a 69,000 sq. ft. single building located on 5.3 acres of land at 175 Milens Road, Tonawanda, New York (Exhibit 1). The site location is above the 100 year flood water elevation. The facility consists of approximately 63,000 sq. ft. of one story manufacturing/service area and 6,000 sq. ft. of office are. Located within the building's manufacturing/service area are the following designated PCB work and storage areas (Exhibit 2):

PCB Work Area - An interior area 37 ft. 3 in. x 13 ft. 10 in. with a 6 inch thick concrete floor enclosed by a 8 inch high x 9 inch thick concrete curb providing secondary containment for 2500 gallons. The PCB work area is used for storage during receiving of PCB items at the facility, in-process storage of PCB items during repair operations, and storage of PCB items used for repair operations. Three portable 275 gallon capacity tanks used for the transportation of PCB oil (B001) from

off-site are also stored in this area. The 275 gallon tanks are of welded low carbon steel construction with an oval configuration 44 inches x 27 inches x 60 inches in length with a 14 gauge wall thickness.

PCB Storage Area - An interior area 24 ft. 6 in. x 21 ft. 6 in. with a 6 inch concrete floor enclosed by a 16 inch high x 9 inch thick concrete curb providing secondary containment for 5,200 gallons. The PCB storage area has separate secured access only from the exterior of the facility and is used for PCB items prior to shipment to qualified disposal sites.

In addition to the PCB work and storage areas other areas are designated for RCRA Hazardous Wastes and waste oil (less than 50 ppm PCB concentrations).

Waste Oil Tank Storage Area - An interior area 17 ft. 4 in. x 14 ft. 10 in. with a 6 inch thick concrete floor enclosed by a 24 inch high x 10 inch thick concrete curb providing secondary containment for 3800 gallons. The waste oil tank storage area contains a 2,000 gallon capacity storage tank . The 2000 gallon tank has a locked top fill point and is used for storage of waste transformer oil with PCB concentrations less than 50 ppm.

RCRA Hazardous Waste Storage Area - An exterior 16 ft. x 30 ft. fenced area on a concrete pad for RCRA hazardous waste drum storage. Upon approval of the withdrawal request of the RCRA Part A Application, the exterior RCRA drum storage area will be closed and space designated inside the building for accumulation of RCRA hazardous wastes for less than 90 days.

PCB Operation Plan

All service operations at the Buffalo Service Shop which involve PCB liquids, solids, and articles are conducted in accordance with Federal EPA Regulations 40CFR761, New York State Hazardous Waste Regulations 6NYCRR Parts 360 through 366, and the General Electric Apparatus and Engineering Services Procedures EP-HS-30.2 (Appendix).

The Buffalo Service Shop receives PCB liquids, solids, and articles for storage prior to disposal. These materials are also generated by the Buffalo Service Shop from service and repair activities at the facility and at customers' locations. PCB items received by the Buffalo Service Shop consist of drummed liquids and solids, and PCB articles. Upon arrival of the transporter, the Shipping-Receiving Clerk completes a PCB Unloading

Authorization Form (Exhibit 3). Unloading of the transporter must then be authorized by Shop Management Personnel. Upon obtaining unloading authorization, the Shipping-Receiving Clerk receives the PCB item and signs the appropriate copies of the hazardous waste manifest. The manifest copies are sent to the Electrical Planning Specialist for review and distribution and the material is moved to the PCB work area. If the item is a PCB article (e.g. transformer) too large for the PCB work area, it is placed in the immediate vicinity with drip pans provided. The PCB item is marked by the Shipping/Receiving Clerk with the date of receipt. The Electrical Planning Specialist issues instructions for marking, labeling, quantity verification, identification and decontamination procedures as required. Upon completion of the operation specified in the planning, the Electrical Specialist records the material received, and generated by decontamination, into the PCB Inventory Log. The PCB item is then placed in the PCB Storage Area or shipped to a qualified disposal site.

All items shipped for disposal are manifested as PCB items unless tests are obtained to verify that PCB concentrations are below 50 ppm. The Electrical Planning Specialist is responsible for obtaining PCB Test Analysis and maintaining test reports. The manifests are prepared and distributed by

the Electrical Planning Specialist who also arranges for shipment and disposal with qualified transporters and disposal sites. The electrical Planning Specialist maintains records of PCB materials received, shipped, and in inventory. These records are maintained in the facility's files for five years.

The 2000 gallon storage container is used only for the storage of scrap transformer oil certified to be less than 50 PPM PCB. To maintain required levels below 50 ppm PCB concentration, the following procedure is strictly adhered to.

The 2000 gallon tank fill point is securely padlocked. The Electrical Planning Specialist has control of the lock key. To obtain the key to utilize the tank, a certified test report of PCB level of liquid must be available. Written planning is then issued to advise which transformer or drums of liquid can be emptied into the 2000 gallon tank. The Electrical Planner maintains an inventory log indiating PCB concentration, gallons added, weight of liquid, date added, and work order number

PCB UNLOADING AUTHORIZATION

Customer _____ Location _____

RO _____ Quote _____

Carrier _____ Date Expected _____

EQUIPMENT DUE		INSPECTION CHECK			INSPECTED BY
Drums - Liquid	_____	17E Drums	Yes ___	No ___	_____
Recovery Drums	_____	Leaking	Yes ___	No ___	_____
Drums - Solids	_____	17H Drums	Yes ___	No ___	_____
Capacitors	_____	Leaking	Yes ___	No ___	_____
Transformer	_____ KVA	Drip Pan	Yes ___	No ___	_____
	_____ KVA	Leaking	Yes ___	No ___	_____
	_____ KVA	Manifest	Yes ___	No ___	_____
Other	_____	Hauler Permit	Yes ___	No ___	_____

Comments/Notes:

Install PCB Label on Equipment.
Mark Equipment with Date Received.

Unloading Authorized by _____

Date _____

HAZARDOUS WASTE ANALYSIS PLAN

The Buffalo Service Shop is responsible for identifying those materials which upon disposal are defined as hazardous wastes under RCRA and/or by the hazardous waste management regulations of the State of New York. These materials include all stock materials that could result in hazardous waste when discarded and hazardous wastes produced or received by the Shop including PCB items.

A. Stock Materials

1. All stock materials used in the Buffalo Service Shop will be reviewed annually to determine if they exhibit hazardous characteristics or are included in the hazardous waste substance listings specified in 6NYCRR Part 366. Identification of materials will be accomplished through the use of data established by the Domestic Apparatus and Engineering Programs Deptartment on commonly used Service Shop materials, material safety data sheets and vendor information.

2. New materials added to stock will be reviewed by the Electrical Planner to determine if they will require control or disposal as hazardous wastes when discarded.

3. The identification of stock materials as potential hazardous wastes will be in accordance with the procedures defined in the "Hazardous Waste Analysis" section of the ASBD Hazardous Waste Management System manual.

4. A current listing of materials maintained in stock which require control or disposal as hazardous wastes will be maintained in the Buffalo Service Shop's Hazardous Waste Analysis File.

B. Shop Process Wastes

1. Materials produced by shop processes will require periodic chemical and physical analysis to determine if they exhibit hazardous characteristics. Analyses for hazardous waste characteristics will be performed in accordance with EPA procedures specified in 40CFR Part 261.

If the analysis shows no hazardous characteristics, then the analysis will be repeated annually or whenever a significant process change occurs (e.g. change of cleaning agent). If hazardous characteristics are identified, then analysis is required each time the material is removed for disposal.

2. Materials generated by the Buffalo Service Shop which require analysis are as follows:

Material	Location	Type of Analysis
Sludge	Oil Water Separator	Ignitability (D001) Corrosity (D002)
	Cleaning Area Sumps	EP Toxicity (D004-D011) PCB Concentration (B005)
Abrasive Blasting Fines	Abrasive Blast Dust Collectors	EP Toxicity (D004-011)
Waste Oil		PCB Concentration B002, B003)

C. PCB Items and Wastes

Test analysis reports for PCB concentration must be received with all shipments of PCB contaminated liquids into the Buffalo Service Shop. All electrical equipment containing insulating liquids must be assumed to be PCB contaminated until a sample is obtained by the Buffalo Service Shop and analyzed for PCB concentrations. All waste oil must be sampled and analyzed to determine PCB concentrations prior to shipment to disposal. All solvents used for decontamination of PCB

items must be sampled and analyzed for PCB concentrations prior to shipment to disposal All analyses for PCB concentration will be performed by electron capture gas chromotography in accordance with the accepted EPA methods.

D. Waste Analysis Reponsibility and Record Keeping

The Electrical Planning Specialist is responsibile for obtaining samples and analysis of all hazardous wastes generated and shipped from the Buffalo Service Shop. The Electrical Planning Specialist is also responsible for insuring that analysis reports are obtained for PCB items received by the Buffalo Service Shop.

Laboratory facilities utilized for hazardous waste analysis include:

General Electric Insulation Test Laboratories
Denver Colorado
Philadelphia, Pa.
Pittsfield, Mass.

Cecos International
Niagara Falls, New York

Acts Testing Laboratory
Cheektowaga, New York

Recra Research Inc.
Tonawanda, New York
Cheektowaga, New York

Copies of test analysis reports will be maintained in the Buffalo Service Shop's Hazardous Waste Analysis File.

SECURITY

The General Electric Buffalo Service Shop is completely surrounded by a fence which is locked when operations are not being conducted at the facility. All PCB work and storage areas are within the building which is also secured when operations are not being conducted. The PCB storage area has separately secured access with keys assigned to the Electrical Planning Specialist and Shop Foreman.

The PCB storage area and the RCRA hazardous waste storage area are marked with the signs "Danger - Unauthorized Personnel Keep Out".

Normal operation of the facility is two shifts, five days a week.

HAZARDOUS WASTE INSPECTION PLAN

The PCB work area, the waste oil storage area, and the PCB storage area will be inspected weekly by the Electrical Planning Specialist. Containment curbs will be checked visually for cracking or other deterioration. All PCB containers and PCB articles will be inspected for leakage. The concrete floor inside of the curb will also be inspected for signs of leakage. All PCB containers and PCB articles will be checked for proper labeling and dating. The inspection will verify the integrity of containers and articles and the orderly arrangement of the areas. Any PCB articles adjacent to the PCB work area will be inspected to insure that drip pans are provided and that there is no visible signs of leakage. Inspection results will be recorded and maintained on file for three years.

The RCRA hazardous waste storage area will be inspected by F.B. Steirheim, Shop Maintenance. The inspection will verify that the containers are in good condition, that there is no visible leakage, and that there is orderly

arrangment of containers. Containers will also be checked for proper labeling and dating. Inspection results will be recorded and maintained on file for three years.

Personal safety equipment including protective gloves, boots, face shields, respirators, and disposable coveralls are maintained in the Stock Room and will be checked weekly by F.B. Steirheim, Shop Maintenance.

Spill control equipment including absorbent material, plastic sheeting, brooms, shovels, and empty drums are maintained in the Stock Room and will be checked weekly by F.B. Steirheim, Shop Maintenance.

Emergency response equipment consisting of portable fire extinguishers, shop sprinkler system, and the shop public address system will be checked weekly by F.B. Steirheim, Shop Maintenance.

Any faulty hazardous waste equipment, structures, or evidence of leakage identified during inspection will be corrected immediately.

HAZARDOUS WASTE MANAGEMENT INSPECTION -- FORM 2

DATE _____ TIME _____ INSPECTOR _____ PAGE ____ of ____

STORAGE CONTAINERS

SHOP LOCATION	CONTAINER NUMBER	CONTAINER TYPE	EPA HAZARDOUS WASTE NO.	CONDITION STATUS (✓ IF O.K.)			CORRECTIVE ACTION REQUIRED
				LABELED	COVERS	NO SPILLAGE	

RECORDS OF INSPECTION

Tank	Date	Inspection Method	Conditions Noted	Recommended Repair Work	Inspector's Name

STORAGE INSPECTION RECORDS

PCB AND PCB ITEMS

Permanent Storage

Date	Location	Status	Comments

HAZARDOUS WASTE MANAGEMENT INSPECTION -- FORM 1

This Form must be completed weekly and filed in the RCRA Operating File for three years.

_____ Service Shop

EPA Identification Number _____

Date _____ Time _____ Inspector _____

REQUIRED EQUIPMENT	QTY.	EQUIPMENT AVAILABLE AND IN GOOD CONDITION	CORRECTIVE ACTION REQUIRED
PERSONAL SAFETY:			
Rubber Gloves			
Rubber Boots			
Disposable Coveralls			
Face Shields			
Respirators			
SPILL CONTROL:			
Absorbent Material			
Plastic Sheeting			
Brooms			
Shovels			
Empty Drums			
EMERGENCY RESPONSE:			
Fire Extinguishers			
Internal Communication			
External Communication			

WASTE STORAGE AREA

Storage Facilities Are Properly Segregated _____

Storage Facilities Are Accessible for Inspection _____

PERSONNEL TRAINING PLAN

Annual classroom training will be conducted for all Shop Personnel. This training will include hazardous waste identification, hazardous waste shop floor control, and shop emergency and contingency plans. Specialized on-the-job training utilizing information and consultation provided by General Electric Apparatus & Engineering Services Environmental Engineering Operation will be provided to individuals with specific hazardous waste responsibilities. Shop personnel involved with PCB servicing activities attend 2 day training sessions on procedures and regulations for handling PCB's The Buffalo Service Shop maintains copies of the General Electric Service Shop Hazardous Waste Management System Manual and Apparatus and Engineering Services Engineering Procedure, "PCB Servicing - Procedures and Control".

Tony Hajmanowski, Electrical Planning Specialist, is familiar with the Service Shop Hazardous Waste Manual and PCB procedures and is responsible for

conducting in-shop training on hazardous wastes. Tony Hejmanowski has also attended a two day Seminar on "Industrial Waste Management Strategies" conducted by the CECOS company in 1983.

0049Y

PREPAREDNESS
&
PREVENTION

H. PREPARDNESS AND PREVENTION PLAN

1. SPCC Plan

GENERAL ELECTRIC

175 Milens Road

Tonawanda, New York

Spill Prevention Control
and
Countermeasures Plan

Prepared for:

General Electric Company
Apparatus Service Division
175 Milens Road
Tonawanda, New York 14150

Prepared by:

R. B. MacMullin Associates
826 Pine Avenue
Niagara Falls, New York 14301

RBMA Job Number 8254

April 24, 1981

Rev. 1: December 1, 1982

R. B. MACMULLIN ASSOCIATES
Job No. 8254

APPROVAL PAGE

MANAGEMENT APPROVAL - General Electric Company Apparatus Service Division.

This SPCC Plan will be implemented as herein described.

Signature: Howard Drews

Name: Howard Drews
Title: ~~Production~~ Manager Mfg. Eng.
Date: 12/6/82

CERTIFICATION - R. B. MacMullin Associates

I hereby certify that I have examined this facility, and am familiar with the provisions of 40CFR112, and attest that the Spill Prevention Control and Countermeasures Plan for this facility has been prepared in accordance with good engineering practices.

Signature: Peter M. Petrone

Name: Peter M. Petrone, P.E.
Title: Partner
Date: DEC 6, 1982

N. Y. State P.E. Registration No. 57570

R. B. MACMULLIN ASSOCIATES
Job No. 8254

SPILL NOTIFICATION PROCEDURES

1.0 Internal

1.1 Reporting

Any person observing a spill on the shop site will report this occurrence immediately to:

1.1.1 Emergency Coordinator

Name: Howard Drews

Home Address: 2595 Parker, Tonawanda, N.Y. 14150
Home Phone: 692-8491
Work Phone: 876-1200 x 241

1.1.2 First Alternate Emergency Coordinator

Name: Anthony Hejmanowski
Home Address: 39 Chateau Ct., Depew, N.Y. 14043
Home Phone: 683-4245
Work Phone: 876-1200 x 284

1.1.3 Shop Manager

Name: Paul J. Desmarais
Home Address: 166 Brandywine, Williamsville, N.Y.
Home Phone: 689-7239
Work Phone: 876-1200 x 231

1.2 Spill Information Required

1.2.1 Time observed.
1.2.2 Location
1.2.3 Shop sewer or other drain involved.
1.2.4 Water bodies or storm sewers involved.
1.2.5 Material released.
1.2.6 Probable source.
1.2.7 Volume and duration.

2.0 External

2.1 Reporting

In the event of a spill into a waterway or sewer, it is the responsibility of the Emergency Coordinator or his Alternate to immediately notify, by telephone, the following:

2.1.1 Local

Town of Tonawanda WWTP
Two Mile Creek Road
Town of Tonawanda, New York
Phone: 716/693-4900

2.1.2 State

Department of Environmental Conservation
600 Delaware Avenue
Buffalo, New York
Phone: 716/842-5041 or 24 hr. Oil & Hazardous Material Spill Notification No. 518/457-7362

Also -

Department of Transportation
Regional Oil Spill Engineer
General W. J. Donovan State Office Building
Buffalo, New York
Phone: 716/842-5048 or 24 hr. Oil & Hazardous Material Spill Notification No. 518/457-7362

2.1.3 Federal EPA Regional Administrator

Mr. Bruce Adler
U.S. Environmental Protection Agency, Region II
26 Federal Plaza, Room 437
New York, New York 10278
Phone: 212/264-9898

2.1.4 Coast Guard

North End of Fuhrman Boulevard
Buffalo, New York
Phone: Days - 716/846-5820
Nights, Weekends & Holidays - 716/846-4153

2.1.5 National Response Center

Phone: 800/424-8802

2.0 External - continued

2.2 Spill Information Required

2.2.1 Name and telephone number of reporter.

2.2.2 Name and address of facility.

2.2.3 Exact location of spill in plant.

2.2.4 Material spilled.

2.2.5 Volume and duration of spill.

2.2.6 Time observed.

2.2.7 Extent of injuries, if any.

2.2.8 The possible hazards to human health, or the environment outside the facility.

2.2.9 Actions taken for containment and cleanup.

2.2.10 Person to contact on scene.

3.0 Duties of Emergency Coordinator

3.1 At all times there must be at least one employee either on the facility premises or on call with the responsibility for coordinating all emergency response measures.

3.2 In addition to the notification of government agencies specified in Section 2.1, the duties of the Emergency Coordinator are defined in 45CFR265.55 and 265.56 (see Appendix C).

3.3 It is required that the Emergency Coordinator and his alternates be thoroughly familiar with the content of 45CFR265.55 and 265.56 and the Spill Plan.

4.0 Spill Prevention Control

4.1 Inground Tank Storage

There is one 2,000 gallon carbon steel tank east of the PCB area, containing water contaminated with PCB'S. This tank had previously been used to catch wash water from the PCB work area, and to catch drainage from a sink in the area. The inlets have been plugged and this tank is no longer in use. It is scheduled to be emptied and removed in 1983. See plot plan (Appendix B).

4.1.1 Inspection

The inground storage tank will be tested to insure its integrity once a year. The testing procedure will be one of the following or equivalent:

4.1.1.1 Pressure Test - All vents, outlets and inlets of a tank are sealed with one fitting (usually a vent) fitted with a pressure gauge. The tank will then be pressurized to about 10 psi; after allowing for an initial loss of pressure, the tank will be allowed to equalize and then be examined daily for about four days with a record kept of pressure drop. The tank should maintain pressure throughout this period.

4.1.1.2 Level Testing - The tank will be placed in no-use status for a period of four days and accurate level readings will be taken with a marked dip stick at the same point over the time period. The tank should show no loss over this time period.

4.1.2 Spill Potential

In the event of leakage from the tank, PCBs would reach ground water.

4.1.3 Weekly Control

4.1.3.1 The inground storage tank will be inspected once per week for:

4.1.3.1.1 High-level alarm operable.

4.1.3.1.2 Liquid level (stick measure minimal).

4.1.3.1.3 Records available and up to date.

4.1.3.1.4 Spill clean-up kit available near pump-out transfer area.

4.0 Spill Prevention Control - continued

4.1.4 Decommissioning of Inground Tank

This tank is scheduled to be removed during 1983.

4.2 Above Ground Tank Storage (Oil tanks greater than 660 gallons and any PCB tanks).

Tank Capacity	Material	Location	Fill Point	Secondary Containment
6000 Gal.	10CA Oil	East Side	Tank Fitting	Dyke
6000 Gal.	10CA Oil	East Side	Tank Fitting	Dyke
2000 Gal.	Scrap Oil	In-shop South End Hi Bay	Top	Dyke

4.2.1 Control Measures

In order to prevent oil spills, the following measures have been implemented:

4.2.1.1 All storage tanks are contained by dykes.

4.2.1.2 Outside tanks are equipped with level gauges.

4.2.1.3 All piping will be inspected for corrosion and/or leaks weekly.

4.2.1.4 Storage tanks and dykes will be visually inspected weekly for signs of deterioration or leaks. Inspection will include foundations and support of the tanks.

4.2.2 Spill Potential

The possibility of an uncontrolled spill is minimal since the tanks are dyked. Should a tank leak and a dyke failure occur simultaneously, oil could flow into storm drains located in the parking lot. Oil entering the storm drains would flow into Two Mile Creek.

4.3 Drum Storage

(Oil storage exceeding 1320 gallons and all PCB drums).

Number of Drums	Material	Location
234 (Max.) Capacity	PCB or PCB-Contaminated Liquid	South End of Bldg. (See Attached Plot Plan - Appendix B).

4.0 Spill Prevention Control - continued

4.3 Drum Storage - cont'd.

4.3.1 Control Measures

To prevent spills the following measures have been implemented:

4.3.1.1 Storage area is dyked. Stored volume will not exceed capacity of dyke.

4.3.1.2 Area is enclosed and locked. Only authorized personnel allowed in storage room.

4.3.1.3 Special drum lifting device used when moving drums.

4.3.1.4 There are inspection aisles.

4.3.1.5 Spill kits are available.

4.3.1.6 Records are available and up to date.

4.3.1.7 Area will be inspected on weekly basis for:

4.3.1.7.1 Leaks.

4.3.1.7.2 Lids and bungs in place.

4.3.1.7.3 Markings are proper.

4.3.2 Spill Potential

The possibility of an uncontrolled spill is minimal since the storage area is dyked. In the event of a dyke failure or vandalism, spilled material could reach the storm drains located in the parking lot and from this point, flow into Two Mile Creek.

4.0 4.4 Temporary Container Storage

The facility has three (3) 275 gallon storage tanks which are normally used for field servicing of equipment. On occasion, one or more of these tanks are used at the facility to store PCB's from equipment undergoing repair. Storage time is normally less than 30 days. When not in field use these containers are stored in the PCB work area. (See attached Plot Plan - Appendix B).

4.4.1 Control Measures

In order to prevent oil spills, the following measures have been implemented:

4.4.1.1 The PCB work area is dyked. Stored volume will not exceed capacity of dyke.

4.4.1.2 The PCB work area is surrounded by a trench which had been used to drain the work area to the underground tank. The drains to the tank have been blocked off.

4.4.1.3 The containers have been fitted with a lifting lug for use when moving containers.

4.4.1.4 There are inspection aisles.

4.4.1.5 Spill kits are available.

4.4.1.6 Records are available and up to date.

4.4.1.7 Area will be inspected on a weekly basis for:

4.4.1.7.1 Leaks.

4.4.1.7.2 Proper Markings.

4.4.1.7.3 Buildup of liquids in dyke.

4.4.2 Spill Potential

The possibility of an uncontrolled spill is minimal since the storage area is dyked. In the event of a simultaneous spill and dyke failure, the trench surrounding the PCB work area is capable of containing 650 gallons. Given the small quantities of PCB's stored in the area, and the location of the area, it is highly unlikely that spilled materials could reach the storm drains located in the parking lot. In the event that spilled material did reach the storm drains, it would flow into Two Mile Creek.

5.0 Security

In order to prevent spills that would result from vandalism on the Shop site, the following measures will be taken to prevent such occurrences:

5.1 The master flow and drain valves and any other valves that will permit direct outward flow of a tank's contents to the surface will be securely locked in the closed position when in non-operating or non-standby status.

5.2 The starter control on all oil/PCB pumps will be locked in the "off" position or located at a site accessible only to authorized personnel when the pumps are in a non-operating or non-standby status.

5.3 The loading-unloading connections of oil/PCB pipelines will be securely capped or blank-flanged when not in service or on standby service for an extended time.

5.4 Facility lighting will be commensurate with the type and location of the facility. Consideration will be given to:

5.4.1 Discovery of spills occurring during hours of darkness, and

5.4.2 Prevention of spills occurring through acts of vandalism.

6.0 Spill Response Action

6.1 Small Spills

6.1.1 A spill is considered small if shop personnel can contain and control the material and providing no oil/PCBs reach a waterway or sewer system.

6.1.2 Sufficient quantities of absorbent material shall be kept in the Shop to be used in the event of a small spill. When a spill occurs, steps will be taken to prevent spillage from entering a sewer or storm drain. Absorbent material shall be spread over the spilled oil/PCB in sufficient quantity to absorb the material.

6.1.3 The absorbent will be collected and disposed of in a qualified chemical waste landfill.

6.1.4 At no time will oil or PCBs be washed down any drain.

6.2 Larger Spills

In the event of an oil or PCB spill into a waterway or sewer system, action shall be taken to remove or control the material, if possible. Such action should occur after notification of the responsible agencies (Section 2.0) and with their full concurrence.

6.2.1 In the event of such a spill:

6.2.1.1 An examination of the affected waterway should be made by Shop personnel to determine what steps are necessary. If the spill is into a sewer system, the operators of that system should be notified.

6.2.1.2 If a spill should occur into a waterway that requires cleanup action beyond the capabilities of the Shop personnel, then the services of a reputable spill removal contractor will be engaged.

6.0 Spill Response Action - continued

6.2.1.2 - continued

Contractors in the Eastern United States area include:

	Contractor No. 1	Alternate
Name of Firm:	CECOS INTERNATIONAL Special Services Div.	NEW ENGLAND POLLUTION Control Services
Address:	Niagara Falls Blvd. @ Walmore Road Niagara Falls, N.Y.	7 Edgewater Place E. Norwalk, Connecticut
Telephone:	716/284-7113	203/853-1990

7.0 Inspection and Records

In addition to keeping records of all discharges from dyked areas, records will also be kept of maintenance inspections.

Maintenance inspections will be made by a competent person and will be more comprehensive than observations made by operators in their routine activities.

7.1 The following inspections will be performed at least once per week using format of (Appendix A, Exhibit 1, Weekly Inspection Records,) and will include, but not be limited to, the following.

7.1.1 Drainage - Drainage ditches, dyked areas and storage areas will be inspected for accumulation of oil/PCBs that may have escaped from small leaks.

Any escaped oil/PCBs will be collected and returned to waste storage tanks or drums.

7.1.2 Inspection of Inground Storage Tanks - The high-level alarm will be inspected to see that it is operable. The liquid level will be measured and any net losses, allowing for additions and withdrawals, will be noted in the record. Records will be available and up to date. Spill clean-up kit will be available near the pump-out transfer area.

7.1.3 Inspection of Bulk Storage Tanks - Storage tanks will be visually inspected for signs of deterioration or leaks which might cause a spill. Such inspection will include the foundations and support of tanks that are above the surface of the ground.

7.1.4 Inspection of Drum Storage Areas - Drum storage areas will be visually inspected for signs of leakage. Inspection will verify the integrity of the drums (no ruptures or leaking bungs) and an orderly arrangement of the area to prevent accidents in handling.

7.0 Inspection and Records - continued

7.1.5 Inspection of Temporary Container Storage - Temporary Container Storage area will be visually inspected for signs of leakage. Inspections will verify the integrity of the containers and any PCB containing equipment in the area.

7.1.6 Facility Transfer Operations - In all areas of oil/PCB transfer, including but not limited to tank fill points and transformer fill points, waste oil/PCB drainage areas will be inspected to insure the integrity of all above ground valves, pipelines, flange points, drip pans, pipe supports, etc.

7.2 The following inspections will be performed at least once per year using format of (Appendix A, Exhibit 2, Record of Tank Inspection) and will include the following:

7.2.1 Inground Storage Tanks - All inground storage tanks will be tested to insure their integrity once a year. The testing procedure should be one of the following, or equivalent:

7.2.1.1. Pressure Test - All vents, outlets and inlets of a tank are sealed with one fitting (usually a vent) fitted with a pressure gauge. The tank will then be pressurized to about 10 psi; after allowing for an initial loss of pressure, the tank will be allowed to equalize and then be examined daily for about four days with a record kept of pressure drop. The tank should maintain pressure throughout this period.

7.2.1.2 Level Testing - The tank will be placed in a no-use status for a period of four days and accurate level readings will be taken with a marked dip stick at the same point over the time period. The tank should show no loss over this time period.

7.2.2 Above Ground Storage Tanks - All above ground tanks will be thoroughly inspected once per year. A detailed inspection should include an examination of the entire tank for signs of corrosion, paint loss, cracking, etc.

7.0 Inspection and Records - continued

7.2.3 Temporary Storage Containers - The storage containers will be thoroughly inspected once per year. A detailed inspection should include an examination of the entire container for signs of corrosion, paint loss, leaking, proper marking, etc.

7.2.4 Records of all yearly inspections shall be made and kept on file with this SPCC Plan for a minimum of three (3) years.

8.0 Personnel Training

8.1 All personnel will receive instruction to familiarize them with the SPCC Plan and the use and location of all relevant equipment.

8.2 This program will be directed by a person trained in hazardous waste management procedures.

9.0 Distribution of SPCC Plan

9.1 A copy of the Plan will be maintained at the facility and be available to the Regional Administrator on demand.

10.0 Review and Amendment - The SPCC Plan must be reviewed and amended, as required, whenever one or more of the following conditions occur:

10.1 Applicable regulations are revised.

10.2 The Plan fails to result in satisfactory response to an emergency.

10.3 The shop changes in a way that increases the potential for an emergency or changes the response necessary in an emergency.

10.4 The list of emergency coordinators changes.

10.5 The list of required emergency equipment changes.

10.6 Three (3) years have elapsed since the previous review. The Plan will be amended as a result of this review to include more effective Prevention and Control technology if (1) such technology will significantly reduce the likelihood of a spill event from the shop, and (2) if such technology has been field-proven at the time of the review.

11.0 Emergency Equipment

The shop should have the following minimum emergency equipment available for protection of the personnel, facilities, and the environment in the event of a hazardous waste emergency.

11.1 Personal Protective Equipment Kit (Designate Location of Equipment).

1. Safety Goggles
2. Face Shields
3. Rubber Gloves
4. Rubber Boots
5. Respirator
6. Disposable Coveralls

11.2 Spill Kit (Designate Location of Equipment).

1. Empty 55 gallon 17H drums (2).
2. Absorbent material - enough to absorb 55 gallons of liquid.
3. Shovels (2).
4. Rags
5. Brooms
6. Plastic Sheets

11.3 Fire Protection

1. Water-type extinguisher (portable).
2. Foam-type extinguisher (portable).

11.4 Portable Pump

12.0 Previous Emergency Incidents (Past 12-Month Period)

12.1 None.

APPENDIX "A"

EXHIBIT 1

WEEKLY INSPECTION RECORDS

Oil & PCB Storage Areas

Location (Shop) _____

Inspected By & Date _____

Permanent Storage

Location	Status	Comments

Temporary Storage (30 day storage of miscellaneous PCB materials)

Location	Status	Comments

Keep this inspection record on file for three (3) years.

EXHIBIT 2

RECORD OF TANK INSPECTION

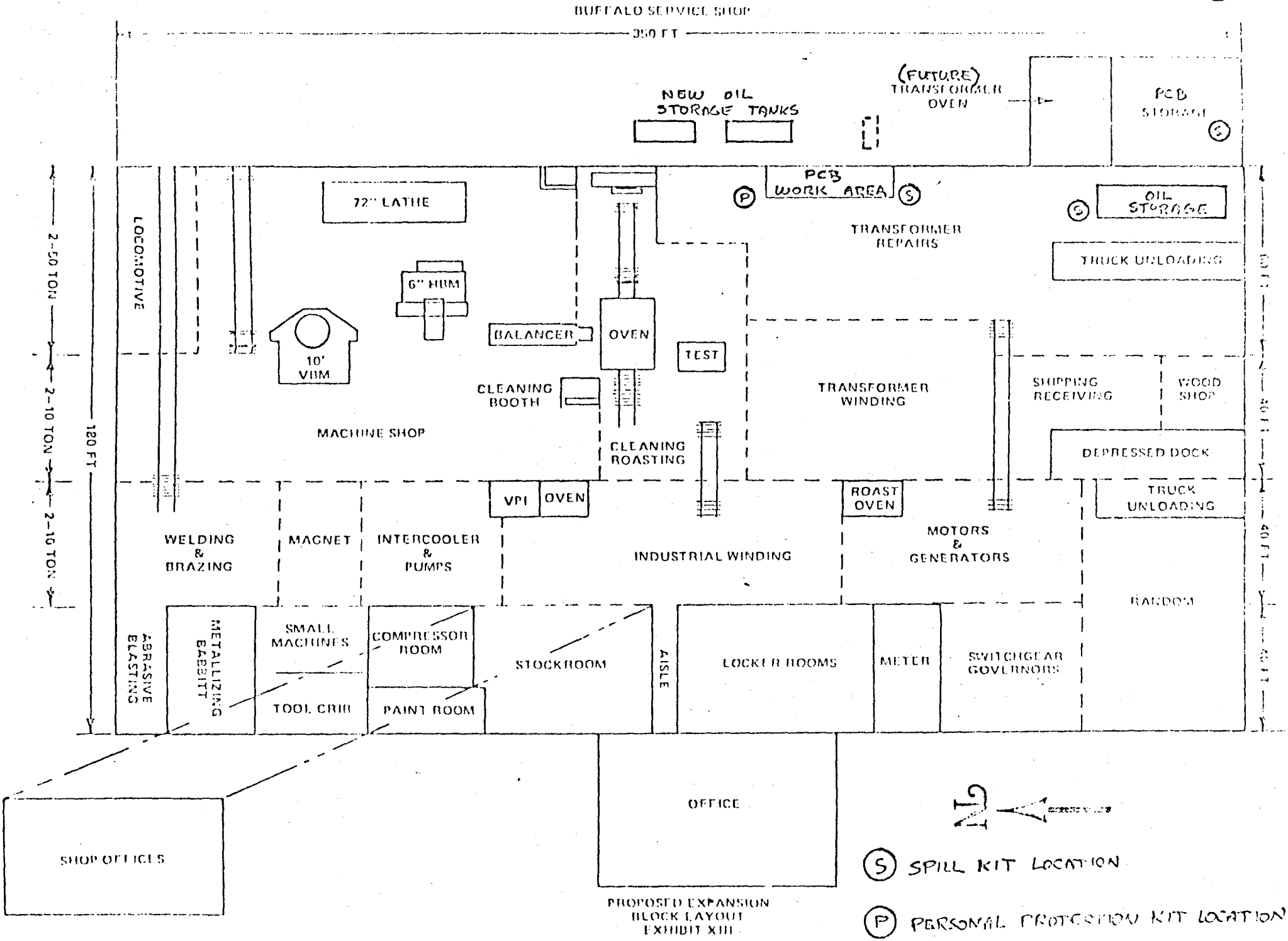
Location (Shop) _____

Inspected By & Date _____

Tank	Inspection Method	Conditions Noted	Recommended Repairs

Keep this inspection record on file for three (3) years.

APPENDIX "B"


BUFFALO SERVICE SHOP
350 FT
NEW OIL STORAGE TANKS
(FUTURE) TRANSFORMER OVEN
PCB STORAGE
PCB WORK AREA
OIL STORAGE
TRANSFORMER REPAIRS
TRUCK UNLOADING
72" LATHE
6" HBM
10' VBM
BALANCER
OVEN
TEST
CLEANING BOOTH
CLEANING ROASTING
MACHINE SHOP
TRANSFORMER WINDING
SHIPPING RECEIVING
WOOD SHOP
DEPRESSED DOCK
TRUCK UNLOADING
VPI
OVEN
ROAST OVEN
WELDING & BRAZING
MAGNET
INTERCOOLER & PUMPS
INDUSTRIAL WINDING
MOTORS & GENERATORS
RANDOM
ABRASIVE BLASTING
METALLIZING BABBITT
SMALL MACHINES
COMPRESSOR ROOM
TOOL CRIB
PAINT ROOM
STOCKROOM
AISLE
LOCKER ROOMS
METER
SWITCHGEAR GOVERNORS
OFFICE
SHOP OFFICES
PROPOSED EXPANSION BLOCK LAYOUT EXHIBIT XIII
LOCOMOTIVE
2-50 TON
2-10 TON
2-10 TON
180 FT
60 FT
40 FT
S SPILL KIT LOCATION
P PERSONAL PROTECTION KIT LOCATION

APPENDIX "C"

§ 265.55 Emergency coordinator.

At all times, there must be at least one employee either on the facility premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures. This emergency coordinator must be thoroughly familiar with all aspects of the facility's contingency plan, all operations and activities at the facility, the location and characteristics of waste handled, the location of all records within the facility, and the facility layout. In addition, this person must have the authority to commit the resources needed to carry out the contingency plan.

[*Comment:* The emergency coordinator's responsibilities are more fully spelled out in § 265.56. Applicable responsibilities for the emergency coordinator vary, depending on factors such as type and variety of waste(s) handled by the facility, and type and complexity of the facility.]

§ 265.56 Emergency procedures.

(a) Whenever there is an imminent or actual emergency situation, the emergency coordinator (or his designee when the emergency coordinator is on call) must immediately:

(1) Activate internal facility alarms or communication systems, where applicable, to notify all facility personnel; and

(2) Notify appropriate State or local agencies with designated response roles if their help is needed.

(b) Whenever there is a release, fire, or explosion, the emergency coordinator must immediately identify the character, exact source, amount, and a real extent of any released materials. He may do this by observation or review of facility records or manifests and, if necessary, by chemical analysis.

(c) Concurrently, the emergency coordinator must assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment must consider both direct and indirect effects of the release, fire, or explosion (e.g., the effects of any toxic, irritating, or asphyxiating gases that are generated, or the effects of any hazardous surface water run-offs from water or chemical agents used to control fire and heat-induced explosions).

(d) If the emergency coordinator determines that the facility has had a release, fire, or explosion which could threaten human health, or the environment, outside the facility, he must report his findings as follows:

(1) If his assessment indicates that evacuation of local areas may be advisable, he must immediately notify appropriate local authorities. He must be available to help appropriate officials decide whether local areas should be evacuated; and

(2) He must immediately notify either the government official designated as the on-scene coordinator for that geographical area (in the applicable regional contingency plan under Part 1510 of this Title), or the National Response Center (using their 24-hour toll free number 800/424-8802). The report must include:

(i) Name and telephone number of reporter;

(ii) Name and address of facility;

(iii) Time and type of incident (e.g., release, fire);

(iv) Name and quantity of material(s) involved, to the extent known;

(v) The extent of injuries, if any; and

(vi) The possible hazards to human health, or the environment, outside the facility.

(e) During an emergency, the emergency coordinator must take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures must include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers.

(f) If the facility stops operations in response to a fire, explosion or release, the emergency coordinator must monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, wherever this is appropriate.

(g) Immediately after an emergency, the emergency coordinator must provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility.

[*Comment:* Unless the owner or operator can demonstrate, in accordance with § 261.3(c) or (d) of this Chapter, that the recovered material is not a hazardous waste, the owner or operator becomes a generator of hazardous waste and must manage it in accordance with all applicable requirements of Parts 262, 263, and 265 of this Chapter.]

(h) The emergency coordinator must ensure that, in the affected area(s) of the facility:

(1) No waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed; and

(2) All emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.

(i) The owner or operator must notify the Regional Administrator, and appropriate State and local authorities, that the facility is in compliance with paragraph (h) of this Section before operations are resumed in the affected area(s) of the facility.

(j) The owner or operator must note in the operating record the time, date, and details of any incident that requires implementing the contingency plan. Within 15 days after the incident, he must submit a written report on the incident to the Regional Administrator. The report must include:

(1) Name, address, and telephone number of the owner or operator;

(2) Name, address, and telephone number of the facility;

(3) Date, time, and type of incident (e.g., fire, explosion);

(4) Name and quantity of material(s) involved;

(5) The extent of injuries, if any;

(6) An assessment of actual or potential hazards to human health or the environment, where this is applicable; and

(7) Estimated quantity and disposition of recovered material that resulted from the incident.

HAZARDOUS WASTE

CONTINGENCY PLAN

AND

EMERGENCY PROCEDURES PLAN

FOR

GENERAL ELECTRIC COMPANY
175 Milens Road
Tonawanda, N.Y.

EPA I.D. NO.: NYD067539940

HAZARDOUS WASTE PERMIT NO.: _____

I. CONTACTS--GENERAL ELECTRIC

A. Emergency Coordinator

Name:	Howard Drews
Home Address:	2595 Parker Avenue
Home Phone:	692-8491
Work Phone:	876-1200 x 241

B. Alternate Emergency Coordinator

Name:	Anthony Hejmanowski
Home Address:	39 Chateau Ct.
Home Phone:	683-4245
Work Phone:	876-1200 x 233

C. Shop Manager

Name:	Paul J. Desmarais
Home Address:	166 Brandywine
Home Phone;	689-7239
Work Phone;	876-1200 x 231

II. EMERGENCY CONTACTS

A.	Police Department	Phone No. 876-5300
B.	Fire Department	Phone No. 876-1212
C.	Ambulance Service	Phone No. 877-5000
D.	Emergency Pollution Response Unit	Phone No. 284-7113

III. REGULATORY AGENCIES

A. Local

Town of Tonawanda WWTP
Two Mile Creek Road
Tonawanda, New York
Phone No. 716-693-4900

B. State — DEC
600 Delaware Avenue
Buffalo, New York
Phone No. 716-842-5041 or 24 Hr.
Oil & Hazardous Material Spill
notification No. 518-457-7362

C. Federal EPA Regional Administrator — U.S. EPA Region II
26 Federal Plaza
N.Y., N.Y. 10007
Phone No. 212-264-9898

D. Coast Guard — North End Fuhrman Blvd.
Buffalo, New York
Phone No. 716-8465820

E. National Response Center — Phone No. 800-424-8802

IV. GENERAL DESCRIPTION OF FACILITIES

A. Type of Manufacturing: Repair of industrial equipment

B. Type of Building: Steel and block construction

C. Number of Buildings: One

D. Location of Plant: 175 Milens Road
Tonawanda, New York 14150

E. Types of Materils Handled: Flammable Liquids, flammable solids, corrosive liquids, corrosive solids, toxic chemicals, PCB's

F. Previous Emergency Incidents: (Describe briefly any Hazardous Waste spills that occured at this location.)

None

G. Potential for Emergency Incidents: (Describe briefly conditions in Hazardous Waste areas that could increase the potential for an incident, e.g., storm severs, heavy truck traffic, waterways adjoining property.)

The possibility of an uncontrolled hazardous waste spill is minimal. All PCB Storage areas are diked and would require a simultaneous tank or container leak and dike failure to allow material to enter storm drains. RCRA hazardous waste is stored in 55 gallon drums and the RCRA hazardous waste storage area is over 200 feet from the nearest storm drain catch basin. All interior facility floor drains discharge through oil water separators into the POTW.

V. EMERGENCY PROCEDURES. The emergency procedures required in the event of a spill, fire, explosion or other incident that could release Hazardous Waste into the air, soil, or surface water are as follows:

A. Area Operator. The Area Operator is the first line of defense in mitigating spills, fires, explosions, etc. The Area Operator is trained to respond to emergencies in his particular area.

In case of an emergency incident, the Area Operator will immediately:

1. Notify the Area Foreman

2. Take action to control or shut down equipment that is contributing to the incident or could possibly contribute to the incident.

3. Contain the emergency incident e.g., use absorbents for spills and portable fire extinguishers for fires.

B. Area Foreman. The Area Foreman will take action to mitigate the incident, evaluate the situation, and call for assistance, if needed. The Area Foreman has been trained to respond to emergency situations in his area.

In case of an emergency incident, the Area Foreman will immediately:

1. Evacuate the area except for personnel performing emergency functions.

2. Notify the Emergency Coordinator.

3. Director other personnel to the emergency as needed.

C. Emergency Coordinator. The Emergency Coordinator is responsible for coordinating plant-wide response to emergency incidents. The Emergency Coordinator or his alternate is available 24 hours a day, 7 days a week. The Emergency Coordinator is responsible for training plant personnel in all aspects of emergency incidents e.g., Hazardous Waste spills, fires, explosions, personal injuries, evacuation procedures, and interfacing with police and fire departments, hospitals, and regional emergency response teams.

In case of an emergency incident, the Emergency Coordinator or his alternate will immediately:

1. Notify the fire and emergency response team.

2. Notify the Show Manager.

3. Notify fire and police departments, hospitals, and regional emergency response teams, if needed.

4. Notify the proper local, state, and federal agencies, if required.

D. Fire and Emergency Response Team. The Fire and Emergency Response Team includes personnel who are trained to cope with Hazardous Waste spills, fires, explosions or other Hazardous Waste incidents. They will have available equipment necessary to contain the emergency; e.g., absorbent material, shovels, fire extinguishers, rubber gloves, face masks, etc.

In case of an emergency incident, the Fire and Emergency Response team will immediately:

1. Proceed to the emergency site.

2. Take the necessary action to mitigate the emergency.

3. Determine if additinal Emergency Services are required.

4. Contain the incident.

5. Clean up the area after the emergency is contained.

VI. AGGREEMENTS WITH LOCAL POLICE, FIRE DEPARTMENTS, HOSPITALS AND EMERGENCY RESPONSE CONTRACTORS.

A. Police. Police are available to direct traffic, handle crowds, and provide security services. Police have a copy of the Contingency Plan and Emergency Procedures Plan.

B. Fire Department. The Fire Department will respond to fires and other emergency incidents providing back-up fire protection and rescue services. The Fire Department has a copy of the Contingency Plan and Emergency Procedures Plan.

C. Hospital. The hospital is available to provide medical service. The hospital has a copy of the Contingency Plan and Emergency Procedures Plan.

D. Emergency Response Contractor. The following contractor is familiar with the plant and is available to provide 28 hours, 7 days a week, back-up service to plant organizations.

Name: CECOS International
Special Services Division

Address: Niagara Falls, New York

Telephone: 716-284-7113

VII. MEASURES TO PREVENT THE ESCAPE OF HAZARDOUS WASTES INTO THE ENVIRONMENT

A. Drum Storage Areas

1. All drums are inspected once a week for:

   a. Leaks
   b. To ensure that lids and bungs are in place
   c. To ensure that markings are proper.

2. The storage area has:

   a. Inspection aisles
   b. A spill kit available
   c. Records available and up-to-date
   d. Security measures in place.

B. Other Hazardous Waste Facilities

1. PCB storage areas have containment.

2. All tanks and PCB articles and curbs are inspected weekly to insure there is no leakage.

VIII. EVACUATION PLAN

All personnel will be thoroughly familiar with the alarm system and the evacuation plan. The evacuation plan is posted conspicuously. The evacuation plan should be a block layout of the facility showing all exits, and preferred exit routes for personnel during any evacuation. (see Exhibit 1)

IX. MINIMUM EMERGENCY EQUIPMENT

In the event of a Hazardous Waste emergency, the shop has the following minimum emergency equipment available for protection of the personnel, facilities, and environment.

A. Personal Protective Equipment Kit (located in the stockroom)

1. Safety Goggles
2. Face Shields
3. Rubber Gloves
4. Rubber Boots
5. Respirator
6. Disposable Coveralls

B. Spill Kit (located in the stockroom)

1. Empty 55 gallon 17H drums (2)
2. Absorbent material (enough to absorbe 275 gallons of liquid)
3. Shovels
4. Rags
5. Brooms
6. Plastic Sheets

C. Fire Protection

1. Portable fire extinguishers located at building columns
2. Three fire hoses and connections located at building columns

D. Emergency Alarm System

1. Internal alarm - Public address system, telephones
2. External communication - telephone

Prepared by: Anthony Hejmanowski, Electrical Planning Specialist (Name and Title) Date: 8/30/83

Approved by: Howard Drews (Emergency Coordinator) Date: 8/30/84

Approved by: Paul Desmarais (Shop Manager) Date: 8/30/83

SERVICE SHOP EMERGENCY PROCEDURES

A. Emergency Control

1. In the event of an emergency, where it is feasible to remain on the premises without unduly endangering plant personnel, the following procedure will be followed:

   a. An Emergency Control Center will be established at the Electrical Foremens Office.

   b. The Emergency Coordinator will report immediately to the Emergency Control Center.

   c. The Shop Emergency Team will report immediately to the Emergency Control Center.

   d. Maintenance and engineering personnel will report immediately to the Emergency Control Center.

2. In the event of an emergency where it is necessary to evacuate the shop building, the following procedure will be followed:

   a. An alternate Emergency Control Area will be established at the Main Gate.

   b. The Emergency Coordinator will report immediately to the alternative Emergency Control Area where he will designate individuals to contact the fire department, police department, and ambulance services required.

   c. Each foreman and supervisor will be responsible for ensuring that all personnel have vacated their area of responsibility. Then they will report to the Emergency Coordinator at the Emergency Control Area.

   d. The shop Emergency Team will report immedialty to the Emergency Control Area.

   e. Maintenance and engineering personnel will report immediately to the Emergency Control Area.

B. Fire

1. The foreman whose area requires fire department assistance will perform the following activities:

   a. Activate internal alarms.

   b. Call the fire department

   c. Assign a person to the shop entrance to direct the firemen to the scene of the emergency.

   d. Assign fire-fighting personnel to fight the fire with the use of fire extinguishers and/or fire hoses. Caution should be used.not to over commit shop fire-fighting activities to the extent that shop personnel are endangered. If in doubt, evacuate the area and wait for the fire department.

   e. Notify the Emergency Coordinator of the Emergency.

2. The Emergency Coordinator will perform the following activities:

   a. Notify the Shop Emergency Team and take charge of shop fire-fighting activities.

   b, Notify the fire department, police department, ambulance services, and emergency response teams as required,

   c. Assign personnel to isolate electrical power and shop gas and fuel supplies as required.

   d. Assign personnel to move material away from the path of fire or from possible water damage.

   e. Evacuate personnel from areas of potential danger.

   f. After the fire, direct and assign people to secure the area and perform clean-up activities.

C. Civil Disturbance

In the event of a civil disturbance, the Emergency Coordinator will direct the following activities:

1. Ensure that all personnel have vacated areas with external doors or windows.

2. Close and lock all gates providing access to the shop property.

3. Move as much company/customer equipment as is practical inside the building.

4. Close and lock all exterior building doors and windows.

5. Activate all exterior alarm systems.

6. Alert shop personnel that an emergency condition exists and that emergency procedures are to be immediately followed.

7. Notify the police department.

D. Bomb Threat

In the event that a bomb threat is received, the following action will be taken:

1. The person receiving the threat will attempt to obtain as much information as possible in accordance with the guidelines detailed in Employee Relations Information letter ERIL 68-19D.
2. The person receiving the threat will immediately notify the shop manager or acting manager.

3. The shop manager or acting manager will notify the police department and in accordance with emergency procedures.

E. Evacuation of Premises

In the event that evacuation of the building becomes necessary, the Emergency Coordinator will direct any of the following activities judged necessary by the nature of the emergency.

1. Notify the police department of evacuation activity and obtain their assistance in providing the safest rout for evacuation from the general area.

2. Activate external alarm systems.

3. Assign personnel to direct traffic to leave Company property in an orderly coordinated manner.

4. Utilize all available shop vehicles and personal cars to provide all personnel with transportation away from Compny property.

5. Remove all essential records from the building.

6. Shut down building utilities that will not be required.

7. If caretaker activities are required, select at least two volunteers to remain as plant caretakers.

8. Close and lock all perimeter fence gates.

9. Close and lock all exterior doors and windows.

10. Notify the police department of the condition of the premises.

11. Notify the fire department of the condition of the premises.

12. In the event that access to the shop is not available, predetermine a satellite Emergency Control Center.

F. Service Shop Fire and Emergency Response Teams

(Requires annual review and revision)

The following individuals are assigned to the shop's fire and Emergency Response Team. These individuals are familiar with the shop's Emergency Procedures and have received training in the use of shop fire-fighting equipment and/or Hazardous Waste spill containment and clean up. Designated individuals are familiar with the shop's utilities and with the proper procedures for shop power isolation and the shutdown of fuel supplies.

Howard Drews - Mfg. Engineer - Emergency Coordinator

Paul Desmarais - Shop Manager

Tony Hejmanowski - Electrical Planner - Alternate Emergency Coordinator

Wally Lukas - Electrical Foreman - Area Foreman

Brady Steirheim - Shop Maintenance - Area Operator

Kenneth Berger - Transformer Repair A - Area Operator

Prepared by Howard Drews
Emergency Coordinator

CLOSURE PLAN

NAME AND ADDRESS: General Electric Company
185 Milens Road
Tonawanda, N.Y. 14150

EPA I.D. NO.: NYD067539940

Hazardous Waste Permit No.: _____

Type of Facility: Storage

Facility Description:

1. This facility contains a fenced-in drum storage area and inside diked areas capable of storing the following types of hazardous wastes:

   Flammable solids and liquids
   Corrosive solids and liquids
   Acids
   Oxidizers
   Spent Solvents
   EP Toxicity materials
   Polychlorinated Biphenyls liquids, solids, items.

Closure Plan:

1. All drums of Hazardous Wastes will be removed from storage areas and shipped to the appropriate treatment or disposal facility.

2. All PCB articles in storage will be decontaminated by draining and flushing. Articles will be removed to a secure chemical landfill. All drain and rinse materials will be removed to qualified incineration.

3. All PCB tanks will be triple rinsed with Kerosene. Each rinse will be 10 percent of the total tank volume and each rinse will be tested to insure that it contains less than 50 PPM PCB concentration. All rinse materials will be removed to qualified incineration.

4. All Hazardous Waste residues will be absorbed with absorbent material (speedi-dry) and placed in drums for disposal. The Storage areas will be scrubbed down, rinsed, and rinsings absorbed with absorbent material (speedi-dry) for disposal in drums.

CLOSURE COSTS

RCRA Hazardous Wastes

Testing and Waste Characterization 40 drums x $50/drum	$2,000
Removal and Disposal 40 drums x $100/drum	$4,000
Decontamination of Storage Area	$2,000

PCB WASTES

Liquids

PCB Analysis 100 drums x $40/drum	$4,000
Transportation to Incinerator 2 truck loads x $1000/load	$2,000
Incineration Disposal	
33 drums (50-500ppm PCB) 1815 gals x $1.25/gal	$2,269
33 drums (500-25,000 ppm PCB) 1815 gals x $2.75/gal	$4,991
34 drums (.25,000 ppm PCB) 1870 gals x $5.00/gal	$9,350
3 tanks (.25,000 ppm PCB) 825 gallons x $5.00/gal	$4,125

Solids

Transportation to Landfill 2 truck loads x $300/load	$600
Disposal at Qualified Landfill 26,000 lbs x $1.50/lb	$39,000

Decontamination

PCB Work and Storage Areas	$3,000
PCB Transformers	$2,000
	$79,335

Administrative Costs (10%)	$7,935
Contingency Costs (15%)	$11,900
Total Closure Costs	$99,170

CLOSURE SCHEDULE

Approximately six weeks would be required to remove hazardous waste inventories and decontaminate hazardous waste storage areas.

POST CLOSURE

As this facility is engaged only in the storage of hazardous waste in drums, tanks, or PCB articles, there will be no post closure requirements.

Written by: Barry York Date: 3/20/84
Barry York
Environmental Engineering,
DA&ESO Programs Dept.

Approved by: Paul J. Desmarais Date: 3/20/84
P.J. Desmarais
~~Shop~~ Manager

0051Y

GENERAL ELECTRIC

Regional Administrator
EPA Region II
26 Federal Plaza
New York, New York 10007

I am the chief financial officer of the General Electric Company, 1 River Road, Schenectady, New York 12345. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265.

The owner or operator identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. See Schedule I.

1. The owner or operator identified above owns or operates the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility: See Schedule I.

2. The owner or operator identified above guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure and post-closure care of the following facilities owned or operated by its subsidiaries. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: See Schedule II.

3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this owner or operator is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility: See Schedules I & II.

4. The owner or operator identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially

equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: None.

This owner or operator is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this owner or operator ends on December 31. The figures for the following items marked with an asterisk are derived from this owner's or operator's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1982.

Part B. Closure or Post-Closure Care and Liability Coverage.

Alternative II

	(Dollars in thousands)
1. Sum or current closure and post-closure cost estimates (total of all cost estimates listed above)	$ 52,416
2. Amount of annual aggregate liability coverage to be demonstrated	$ 8,000
3. Sum of lines 1 and 2	$ 60,416
4. Current bond rating of most recent issuance and name of rating service	AAA - Moody's Aaa - Standard & Poor's
5. Date of issuance of bond	May 1974
6. Date of maturity of bond	May 2004
*7. Tangible net worth (if any portion of the closure or post-closure cost estimates is included in "total liabilities" on your financial statements you may add that portion to this line)	$ 9,823,000
*8. Total assets in the U.S. (required only if less then 90% of assets are located in the U.S.)	$16,379,000

Part B. Closure or Post-Closure Care and Liability Coverage. (continued)

	YES	NO
9. Is line 7 at least $10 million?	X	___
10. Is line 7 at least 6 times line 3?	X	___
*11. Are at least 90% of assets located in the U.S.? If not, complete line 12	___	X
12. Is line 8 at least 6 times line 3?	X	___

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(g) as such regulations were constituted on the date shown immediately below.

Thomas O. Thorsen
Senior Vice President-Finance

March 31, 1983

Peat, Marwick, Mitchell & Co.

Certified Public Accountants

Stamford Square
3001 Summer Street
Stamford, Connecticut 06905

March 31, 1983

Mr. Thomas O. Thorsen
Senior Vice President-Finance
General Electric Company
3135 Easton Turnpike
Fairfield, Connecticut 06431

Dear Mr. Thorsen:

At your request, we have performed the procedures enumerated below with respect to Part B of your certificate, dated March 31, 1983, to the Environmental Protection Agency. These procedures were performed solely to assist you in connection with the filing of the above mentioned certificate, and our report is not to be used for any other purpose. The procedures we performed are summarized as follows:

- The dollar amount of tangible net worth included under item 7, Part B, certificate page 2 - We compared the dollar amount of tangible net worth, which represents total shareowners' equity less goodwill and licenses and other intangible costs included in other assets, with the balances of total shareowners' equity, licenses and other intangibles and goodwill included in the Company's "Statement of Financial Position" (or the related notes thereto) on page 34 of the Company's 1982 Annual Report and found them to be in agreement.

- The dollar amount of total assets in the U.S. included under item 8, Part B, certificate page 2 - We compared the dollar amount of total assets in the U.S. with the balance of United States assets included in the Geographic segment information on page 44 of the Company's 1982 Annual Report and found them to be in agreement.

- To determine that the negative response to item 11, Part B, certificate page 3 was correct, we compared the amount of U.S. assets included under item 8, Part B with the product of 90% times total assets as shown on the "Statement of Financial Position" page 34 of the Company's 1982 Annual Report and found that the amount under item 8 was less than the result of the computation described above.

Because the above procedures do not constitute an examination made in accordance with generally accepted auditing standards, we do not express an opinion on any of the items referred to above. In connection with the procedures referred to above, no matters came to our attention that caused us to believe that the specified amounts or items should be adjusted. Had we performed additional procedures, matters might have come to our attention that would have been reported to you. This report relates only to the amounts and items specified above and does not extend to any financial statements of General Electric Company and consolidated affiliates, taken as a whole.

Very truly yours,

PEAT, MARWICK, MITCHELL & CO.

Donald P. Kern

Donald P. Kern, Partner

DPK:mh

ELECTRIC MUTUAL LIABILITY INSURANCE COMPANY
715 LYNNWAY
LYNN, MASSACHUSETTS 01905

AREA CODE: 617 593-4110

CERTIFICATE OF INSURANCE

TO WHOM IT MAY CONCERN:

This is to certify that the Electric Mutual Liability Insurance Company has issued policies of insurance, as described below and identified by a policy number, to the insured named below; and to certify that such policies are in full force and effect at this time. This certificate of insurance does not amend, extend or alter the coverage afforded by the policies designated below.

Name of Insured: General Electric Company

Address: 570 Lexington Avenue, New York, New York 10022

COMPREHENSIVE AUTOMOBILE LIABILITY

(Insert type of coverage)

Policy Number: M.L. 83-2
Limits: B.I. & P.D. $5,000,000 Combined Single Limit Per Occurrence
Effective Date: January 1, 1983
Expiration Date: January 1, 1984
Location Covered: Within the United States of America

Remarks:

ELECTRIC MUTUAL LIABILITY INSURANCE COMPANY

Date December 27, 1982

By: Shawn K. Barnett
Authorized Representative

CERTIFICATE OF INSURANCE

TO WHOM IT MAY CONCERN:

This is to certify that the Electric Mutual Liability Insurance Company has issued policies of insurance, as described below and identified by a policy number, to the insured named below; and to certify that such policies are in full force and effect at this time. This certificate of insurance does not amend, extend or alter the coverage afforded by the policies designated below.

Name of Insured: General Electric Company

Address: 570 Lexington Avenue, New York, New York 10022

COMPREHENSIVE GENERAL LIABILITY

(Insert type of coverage)

Policy Number: G.L. 83-1
Limits: B.I. & P.D. $5,000,000 Combined Single Limit Per Occurrence
Effective Date: January 1, 1983
Expiration Date: January 1, 1984
Location Covered: Within The United States of America

Remarks:

Subject to its terms and conditions, this policy includes coverage for liabilities incurred by General Electric Company as a result of sudden and accidental discharge, dispersal, release or escape of polluting materials.

ENVIRONMENTAL IMPAIRMENT EXPENSE

(Insert type of coverage)

Policy Number: G.L. 82-170
Limits: $5,000,000 per occurrence
Effective Date: October 22, 1982
Expiration Date: October 22, 1983
Location Covered: Within The United States of America

Remarks:

This policy provides coverage for all necessary or reasonable costs or expenses of removing, nullifying, cleaning-up, transporting or rendering ineffective any substance which has caused Environmental Impairment provided, however, that notice of an occurrence be given within one year from the date of said occurrence.

ELECTRIC MUTUAL LIABILITY INSURANCE COMPANY

Date December 14, 1982

By: Eleanor L. Bardsley
Authorized Representative

EXHIBITS

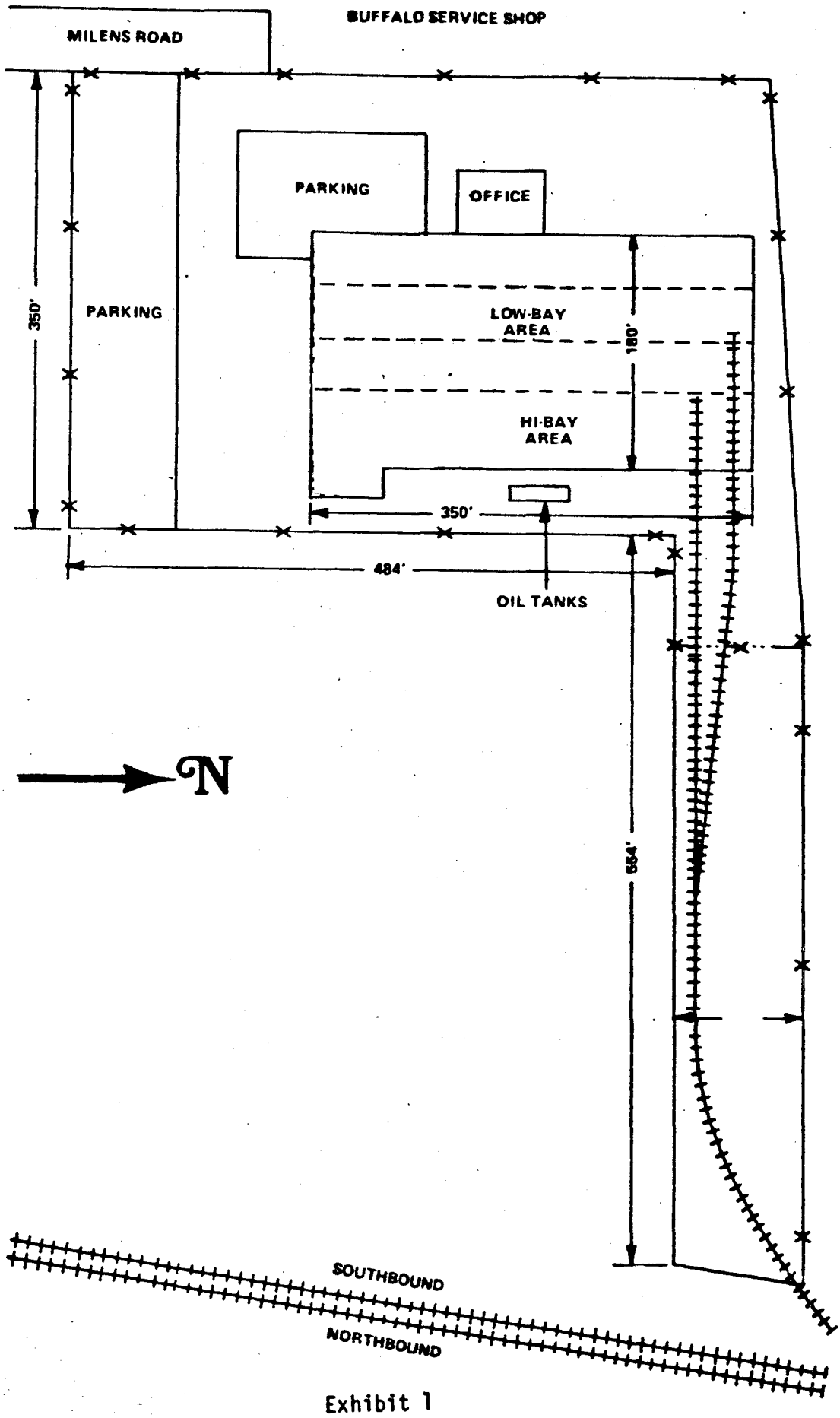

MILENS ROAD
BUFFALO SERVICE SHOP
PARKING
OFFICE
PARKING
350'
LOW-BAY AREA
180'
HI-BAY AREA
350'
484'
OIL TANKS
N
554'
SOUTHBOUND
NORTHBOUND

Exhibit 1

BUFFALO SERVICE SHOP

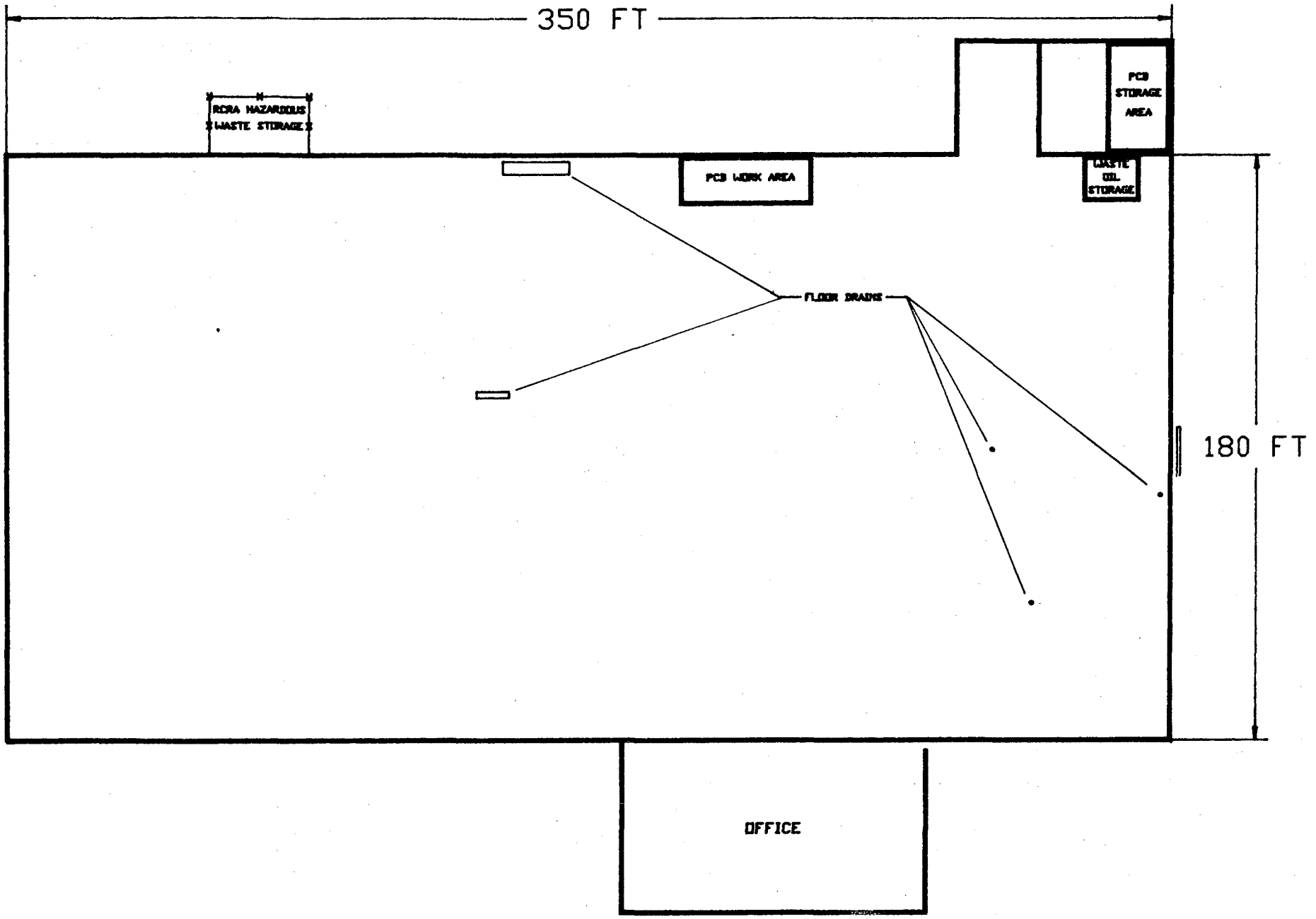


Exhibit 2

EXHIBIT 3

Apparatus & Engineering Services

Engineering Procedure

PCB Servicing — Procedures and Control

This Document Assigned To:

EP-HS-30.2

Apparatus & Engineering Services

Engineering Procedure

PCB Servicing — Procedures and Control

This Document Assigned To:

EP-HS-30.2

Apparatus & Engineering Services

PCB SERVICING — PROCEDURES AND CONTROL

Notice of Intent

This document is assigned to selected Apparatus & Engineering Services (A&ES) personnel for their use in the proper performance of assigned service work activities, and is not intended for use as general industry information. The employee to which this document is assigned will be held personally responsible for safeguarding and controlling the use of the document's contents.

All pages of this document are marked "Company Proprietary Information" and are restricted to use by A&ES personnel only. These pages shall not be read by, copied for, or released to non-A&ES personnel.

This document is the property of A&ES and must be returned to the Company upon request, or when it is no longer needed to support A&ES service work activities, or when its custodian leaves A&ES employment.

IF THIS DOCUMENT IS LOST, PLEASE RETURN IT TO:

A&ES Communication Services
General Electric Company
One River Road
Bldg. 23 — 221
Schenectady, New York 12345

FOREWORD

These instructions interpret PCB regulations as they apply to A&ES and are presented in two main parts:

Part	Covers
EP-HS-30.2	Marking, Storage, Recordkeeping, Disposal, and Business Procedures in PCB Servicing
EP 79-2	Spill Prevention & Control Countermeasure Plan (SPCC)

Other A&ES Engineering Procedures Sections should be utilized as technical references for Polychlorinated Biphenyls as follows:

Section No.	Title/Description
EP-HS-10.1	Control of Polychlorinated Biphenyls
EP-HS-30.1	Spill Plans

The Environmental Protection Agency (EPA) regulations on PCBs are:

- o 5/31/79 Volume 44, No. 106 - PCB Ban, Final Rule
- o 5/6/82 Volume 47, No. 88 - Recodification
- o 8/25/82 Volume 47, No. 165 - Use in Electrical Equipment (Ammendment)

INDEX

PCB SERVICING - PROCEDURES AND CONTROL

I. DEFINITIONS

A. PCB - Any chemical substance or combination of substances that contains 50 parts per million (ppm) or more of the biphenyl molecule that has been chlorinated to varying degrees. Unless otherwise specified, the term PCB is used in these procedures to refer to substances that contain 50 ppm and above of PCBs.

B. Engineering Service Locations/Components - Permanent A&ES Engineering Service facilities and office locations. Does not include A&ES Service Shops or job sites.

C. Job Site - The customer location, away from the A&ES Shop, office, or other A&ES facility. Also referred to as "On-Site."

D. On-Site - See "Job Site."

E. Other - For further definitions, refer to Appendix "F".

NOTE: All mineral oil dielectric filled transformers must be assumed to be PCB contaminated unless the dielectric is tested and found to contain less than 50 ppm or greater than 499 ppm of PCBs.

II. APPLICABILITY

A. PCB Facilities

Buffalo	Cincinnati
Philadelphia	Chicago
Charlotte	San Francisco
Houston	Denver

The above A&ES Service Shops are the only facilities permitted to service PCB Transformers (500 ppm and above) in-shop or to store high concentration PCB liquids (500 ppm and above) and PCB equipment for disposal.

B. Non-PCB Facilities - Facilities such as Service Shops and Engineering Service locations, other than the above PCB facilities are permitted only to perform servicing of PCB-contaminated electrical equipment (50-499 ppm) and Non-PCB Transformers except as noted in paragraph IX. B.2. These facilities can store low concentration PCB liquids (50-499 ppm) in approved drums up to 30 days as explained in paragraph IV. C.

II. APPLICABILITY (Cont.)

Storage of low concentration PCB liquids beyond 30 days is permitted only for bulk storage in approved tank facilities which meet OSHA standards and are covered by a current SPCC Plan.

C. Engineering Service Locations - No storage of PCBs or PCB contaminated electrical equipment is allowed in Engineering Service locations. (See paragraph II. H. for in-use equipment).

D. Substances Covered - includes but is not limited to any of the following materials which contain or are suspected of containing PCBs:

Dielectric Fluids	Slurries
Contaminated Solvents	Asphalt Paving
Transformer Oil, Good	Soil (earth)
Transformer Oil, Waste	Paints
Heat Transfer Fluids	Sludges
Spill Contaminated Materials	Capacitors

E. Untanking Prohibited - There will be no untanking of PCB transformers (500 ppm and above). The Philadelphia Shop, however, can untank railroad transformers.

F. Steam Cleaning Prohibited - With the exception of the Philadelphia Service Shop there shall be no steam cleaning of any PCB transformers or other PCB articles (such as switchgear, circuit breakers, capacitors, oil filled electromagnets, voltage regulators, motors, generators, etc.).

(Steam cleaning of PCB and PCB contaminated transformers is not necessary or approved except in the Philadelphia Shop for repairs to railroad transformers, in which case the discharge must be captured in the PCB waste storage tank.)

G. Containment Requirements - Containment must be provided for the servicing of PCB Articles. This includes all articles which have been in contact with untested transformer oil. Containment must consist of one of the following:

- All servicing performed in a dedicated work area enclosed by a curb or collection trench without external drains unless the drains are connected to a PCB storage tank.

- or Suitable containment provided for all in-process PCB Articles. Containment must be constructed of continuous smooth and impervious materials with a containment lip sufficient to prevent penetration and/or overflow of collected liquids.

II. APPLICABILITY (Cont.)

The presence of free standing liquids resulting from the servicing of PCB Articles should be minimized by the immediate application and collection of absorbent materials such as "oil-sorb" or "floor-dri" to any spills or drips. Collection pans and servicing equipment must be decontaminated by solvent rinsing or placed in the PCB storage area when not in use.

H. In-Use (Installed) Equipment - PCB transformers and capacitors providing power to A&ES facilities require special marking as explained in Section III and annual inventorying. PCB transformers also require periodic inspections as described in Section V.

J. Miscellaneous PCB Equipment - Equipment like PCB capacitors on motors and controls must be handled in our facilities as follows:

1. Non-leaking PCB equipment which is a part of the customer's unit but not being repaired, must be stored in a non-leaking container and returned with his equipment upon completion of the repair.

2. Leaking capacitors or similar equipment must be properly containerized in a DOT 17E or 17C drum and returned to the customer or shipped to a PCB facility within 30 days.

3. Any other equipment which contains PCBs should be referred to the Department Designee (see paragraph IX. A.) for advice and counsel. Procedures for special requirements will be established on an individual job basis.

III. MARKING

A. General - The following PCB containers/items shall be marked with the EPA approved "CAUTION - contains PCBs" label illustrated in Appendix "A".

1. PCB containers
2. PCB storage areas
3. PCB transport vehicles
4. Articles or systems that either contain PCBs or a part that contains PCBs, for example:
   a. PCB transformers
   b. Large capacitors (see definition)
   c. Electric motors
   d. Hydraulic systems

B. In-Use (Installed) Equipment - PCB transformers and large capacitors (containing more than 3 lbs. PCBs) that are in-use in A&ES facilities shall be marked with the EPA/PCB label illustrated in Appendix "A".

C. Shipping - The Department of Transportation label ORM-E illustrated in Appendix "A" as well as the EPA/PCB label shall be affixed to all PCB containers/articles/transformers prepared for shipment.

IV. STORAGE

A. Maximum Storage Time Allowed - Any PCB article, PCB container, PCB liquid, or PCB solid stored for disposal must be properly disposed of within one year from the date it is placed in storage.

B. Storage Over 30 Days - Facilities used for storage of PCB's over 30 days shall meet the following requirements:

1. PCB Container and PCB Article storage
   a. Adequate roof and walls to prevent rainwater from reaching stored materials.
   b. Curbed liquid tight enclosure. Minimum curb 6" high capable of containing the greater of:
      - double the volume of largest stored container
      - 25% of the total volume of stored containers
   c. Curb and flooring to be of impervious material
   d. Site to be above the 100 year flood water elevation (flood plain)
   e. Conforms to requirements of the Spill Prevention & Control Countermeasure Plan including the weekly inspection. Refer to EP 79-2.
   f. Contents (containers) must be marked with a PCB label indicating date material entered storage
   g. Storage area must be clearly marked with PCB labels.

2. PCB Bulk Storage

   a. Storage tank must be designed, constructed and operated in accordance with OSHA standards 1910.106
   b. Design of new tanks and evaluation of existing tanks must ensure that sufficient structural strength is provided to accommodate the high specific gravity of PCB liquids

IV. STORAGE (Cont.)

2. PCB Bulk Storage (Cont.)

c. Secondary containment must be provided with sufficient volume for the contents of the largest single tank plus freeboard for precipitation
d. Storage tank must conform to requirements of the Spill Prevention & Control Countermeasure Plan including weekly and annual inspections. Refer to EP 79-2.
e. Each storage tank containing PCB's must be marked with a PCB label.

C. Storage Up to 30 Days - For up to 30 days, the following PCB items may be stored in areas not complying with Permanent Storage requirements as described in IV. B. above:

1. Non-leaking PCB articles, containers, equipment
2. Leaking PCB articles placed in non-leaking receptacles containing absorbent material
3. PCB containers holding PCB contaminated solids
4. Liquids contaminated to 50-500 ppm PCBs either held for disposal or for return to a transformer.

Contents (containers) must be marked with a PCB label indicating date material entered storage. The above items should be transferred to Permanent Storage as soon as practical. Temporary storage areas shall be identified in the Shop Spill Plan (SPCC) and inspected weekly (refer to EP 79-2).

D. General:

1. Moveable items (e.g. filter presses, containers, material handling devices) that have come in contact with PCBs shall be decontaminated by solvent cleaning when they are removed from a dedicated PCB area. This work shall be performed only in a PCB work or storage area
2. Storage containers shall meet DOT specifications 17C (solids) or 17E (liquids)
3. Stored items must be arranged so that the PCB label marked to indicate the date material entered storage can be readily seen

V. PCB TRANSFORMER INSPECTION PROGRAM

A. Inspection Frequency

1. PCB transformers in use or stored for reuse must be given a documented visual inspection at least once every calendar quarter as follows:

Calendar Quarter	Months
1	January - March
2	April - June
3	July - September
4	October - December

There must be a minimum of 30 days between quarterly inspections.

2. If the PCB transformer in use or stored for reuse poses an exposure risk to food or feed, the visual inspection must be made at least once very week.

B. Visual Inspection

An investigation for any leaks of dielectric fluid on or around the transformer must be included in the visual inspection.

C. Leak Procedures

1. Any PCBs on the exterior of the PCB transformer tank shall be considered to be a leak and must be cleaned and recorded on the inspection record.

2. In the event a PCB transformer leak is found which is running off or about to run off the external surface of the transformer, the transformer must be repaired and cleaned or replaced to eliminate the leak.

3. Leaking material must be cleaned up and properly disposed of according to the disposal requirements given in VIII. The cleanup of any leaking PCB material must be initiated as soon as possible but not more than 48 hours after its discovery.

V. PCB TRANSFORMER INSPECTION PROGRAM (Cont.)

C. Leak Procedures (Cont.)

4. Until repair and cleanup action is completed, any active PCB leak must be contained by measures such as trenches, dikes, buckets, and pans to prevent human or environmental exposure and must be inspected daily to verify that the leak is being contained.

D. Inspection Records - Records of PCB transformer inspections and maintenance history must be kept for at least 3 years after disposing of the transformer and must be kept readily available for inspection by EPA.

The inspection records must contain all the information shown on APPENDIX "B" Form 1 "PCB Transformer Inspection Record," for each PCB transformer.

A copy of the "PCB Transformer Inspection Record" or equivalent must be sent to A&ES Manufacturing - Environmental.

VI. RECORDKEEPING

A. All A&ESO Facilities - Shall maintain periodic inventory and disposal records regarding PCBs as follows:

1. Annually by July 1, prepare a summary of PCB activity during the previous calendar year. Summary can be derived from a continuously maintained log or from receiving records, shipping manifests and physical inventory. It must include the following:
   a. Received Material - (Use Appendix B, Form 2)
      - Date, quantity, weight (KG-kilograms) of PCBs/PCB Items/PCB Transformers received
      - Identify from whom received
      - Total the weight (KG) received for the calendar year
   b. Shipped Material - (Use Appendix B, Form 3)
      - Date, quantity, weight (KG) of PCBs/PCB Items/PCB Transformers shipped
      - Identify to whom shipped
      - Shipping manifest number
      - Total weight (KG) shipped during the calendar year
   c. Material On Hand At Year-End - (Use Appendix B, Form 4)
      - Type, quantity and weight (KG) of PCBs/PCB Items/PCB Transformers retained in facility. (If material is PCB large capacitors, show only number of capacitors, not weight in KG.)

VI. RECORDKEEPING (Cont.)

A. All A&ESO Facilities (Cont.)

2. The above records shall be retained at the A&ES facility permanently or for a period of 5 years after the A&ES facility ceases all PCB activities. These records will be shown upon request to EPA inspection teams.
3. A copy of Appendix B, Form 4 shall be sent to A&ES Manufacturing-Environmental by July 1 of each year.

B. A&ESO Facilities With In-Use (Installed) Equipment - Any A&ES facility which has PCB transformer(s) and/or 50 or more large PCB capacitors electrically in-use (energized) in the facility, shall record these on Form 4. Disposal of any "in-use" transformer or capacitor shall be recorded on Form 3.

VII. TESTING REQUIREMENT FOR PCB CONTAMINATION IN A&ESO FACILITIES

To help ensure the detection and proper disposal of any PCB contaminated materials from A&ES industrial waste drainage systems, the following action is required of all A&ES facilities:

A. Analysis - PCB analysis is required and analysis results must be obtained prior to the removal of any materials from drainage systems used for industrial wastes. This includes oil water separators, holding tanks, sumps, floordrains, cleaning pits, and trench drains. A sample must be obtained from the sludge phase of the material, as well as the liquid phase. This can be accomplished by scooping accumulated material from shallow sumps such as steam cleaning pits or floor drains, or by driving a sampling pipe into the settled materials at the bottom of tanks and oil water separators. If an oil phase exists, such as the oil layer in the inlet side of an oil water separator or the material collected in an oil scavanger tank, then a sample and analysis of that oil is also required.

B. Results - If the results of the sample analyses are 50 ppm PCB or above, then:

1. Any material removed from the tested area will require disposal in accordance with the procedures detailed in Section VIII below, and
2. Decontamination of the service shop's drainage system will be necessary - the Programs Department Manufacturing and Engineering Support Subsection, must be immediately notified of test results so that appropriate decontamination procedures can be established.

C. Waste Oil - All waste oil, except those known specifically to be lubricating, fuel, cutting, or hydraulic oils used in the shop, must also be tested for PCB concentration prior to disposal. If PCB's are 50 ppm or above, Section VIII disposal procedures must be followed.

VIII. DISPOSAL

At the present time, PCBs and PCB contaminated materials/articles can only be disposed of to incinerators or landfill operations that have been awarded a permit by the EPA.

A. Methods - Following is a summary of the methods/alternatives available for PCB disposal:

PCB Item	Description	Disposal Method (See Appendix "D")
PCB Liquids-High Concentration	500 ppm and above of PCB	Qualified Incinerator
PCB Liquids-Low Concentration	50 to 499 ppm PCB	Qualified Incinerator
PCB Transformer or other PCB Articles, except Capacitors	500 ppm PCB or greater	Drain & Decontaminate*, a. Initial drained liquid to Qualified Incinerator b. PCB transformer or Article to Qualified Chemical Waste Landfill c. Solvents to Qualified Incinerator
PCB Contaminated Electrical Equipment (Transformers, Breakers, Reclosers, Regulators, Switches, Electromagnets and Cable)	50 to 499 ppm PCB	a. Drained liquids to Qualified Incinerator b. Drained elec. equipment-normal scrap
Small Capacitors	Less than 3 Lbs. PCBs	Qualified Chemical Waste Landfill

*Equipment can be shipped to qualified Chemical Waste Landfill after it is drained of all free flowing PCB liquid, filled with a solvent in which PCBs are readily soluble, allowed to stand for 18 hours, then drained of all free flowing solvent.

VIII. DISPOSAL (Cont.)

A. Methods (Cont.)

PCB Item	Description	Disposal Method (See Appendix "D")
Large Capacitors	3 Lbs. or more PCBs	Qualified Incinerator
PCB Containers:	- Held liquids 500 ppm PCB and above	Qualified Chemical Waste Landfill when disposed*
	- Held liquids 50 to 499 ppm PCB	Treat as normal Scrap
Solid Wastes	Soil, Rags, Insulation, Solidified Sludge, etc.	Qualified Chemical Waste landfill

B. Disposal Sites - Approved PCB Disposal Sites are summarized in Appendix "D".

*Container can be reused or treated as normal scrap if internal surfaces are flushed three (3) times with a solvent containing less than 50 ppm PCB's. Quantity of solvent for each rinse shall be 10% of PCB container capacity.

IX. BUSINESS PROCEDURES - PCB SERVICING

A. Department Responsibilities

Each domestic Department General Manager is responsible for assuring that facilities reporting to him are in compliance with EPA regulations and are adhering to the procedures established by A&ES relating to PCBs.

It is required that each Department General Manager designate the Manager-Manufacturing/Engineering and Project Support as Department Designee to follow the administration of these procedures, including the recommending of changes to the procedures or to A&ES facilities certified to perform on-site work.

Broadening of the numbers of management people knowledgeable in the EPA regulations should further reduce our risk.

B. Facility Authorization/Work Scope

1. PCB Facilities - Only the A&ES PCB facilities listed in II A. (page 1) are authorized and fully qualified to perform total PCB servicing. PCB facilities are equipped with the necessary manpower, equipment, facilities and storage areas to perform work within the limitations of the current regulations. Their work scope includes all aspects of servicing, both on-site and in-shop. Service offerings include: maintenance, testing, minor repairs, retrofilling, topping off of transformers, storage and/or disposal of PCB equipment (example - transformers and capacitors) and storage and/or disposal of PCB liquids and solids. Untanking of PCB transformers is not permitted under the EPA regulations, except for railroad transformers which will be untanked only in the Philadelphia Service Shop.

2. Non-PCB Facilities

   a. Non-PCB facilities of A&ES may do maintenance and repair and testing of PCB contaminated (50-499 ppm) or non-PCB transformers both on-site or in-shop.

      Engineering Service components may quote, plan and supervise installation, maintenance, repair and testing of PCB contaminated electrical equipment and PCB transformers at customer sites provided certified on-site supervisors are used.

IX. BUSINESS PROCEDURES - PCB SERVICING (Cont.)

B. Facility Authorization/Work Scope (Cont.)

2. b. Non-PCB facilities of A&ES are not permitted to perform work on PCB Transformers (500 ppm and above) with the following exceptions which require specific certification:

i. On-site servicing work (Paragraph IX, B.4.a.)

ii. On-site disposal work (Paragraph IX, B.4.b.)

3. Certification - The following requirements must be met to obtain certification for on-site PCB work:

a. Facility nominates candidate. (Direct labor personnel may be certified.)

b. Department Designee reviews and approves nominee's credentials and need for certified PCB supervisor at that facility.

c. Nominee must satisfactorily complete an A&ES Programs Department approved course covering the procedures and regulations for handling of PCBs, including the latest EPA regulations and A&ES procedures.

The only exception to this certification requirement is that any facility may offer liquid sampling service on-site (Paragraph IX. B.4.a.)

d. See Appendix E for list of certified on-site supervisors.

4. On-Site Work

a. Servicing

i. Scope - The scope of on-site work is limited to sampling, fixing leaks, changing bushings, topping off, retrofilling and similar repairs. (EPA regulations prohibit untanking of PCB transformers.)

ii. Quotations - All jobs must be planned and quoted in writing by a person who is certified and approved by the Department Designee.

IX. BUSINESS PROCEDURES - PCB SERVICING (Cont.)

B. Facility Authorization/Work Scope (Cont.)

4. On-Site Work (Cont.)

a. iii. Supervision - All work must be performed under the supervision of a certified person.

iv. Equipment For Units 500 ppm and Over - All necessary equipment for servicing of units 500 ppm of PCBs and over such as filter presses, hoses, etc., must be obtained from a PCB facility, used on-site and returned directly to the originating facility, or disposed of as PCB waste without entering the non-PCB facility which has performed the work.

v. Equipment For Units 50 to 499 ppm PCB - All necessary equipment for servicing of units less than 500 ppm of PCBs must be either obtained from a PCB facility, used on-site, and returned directly to the originating shop or disposed of as PCB waste without entering the non-PCB facility; or decontaminated immediately after use.

vi. Waste - No PCB materials over 500 ppm of PCBs, solids or liquids, are to be brought into any non-PCB facility. See Paragraph IX. B.4.b. for disposal.

vii. Samples - All test samples from PCB transformers will be properly labelled, packaged and sent directly to the Test Laboratory without bringing them into a non-PCB facility.

viii. Safety - All employees with on-site work assignments will be fully instructed in the applicable on-site safety procedures, in the A&ES Safety Manual.

ix. EPA regulations prohibit the untanking of PCB transformers except for railroad transformers.

IX. BUSINESS PROCEDURES - PCB SERVICING (Cont.)

B. Facility Authorization/Work Scope (Cont.)

4. On-Site Work (Cont.)

b. Disposal

Participation in PCB disposal work will require the transportation of PCB liquids, which is a high-risk undertaking. Only certified on-site supervisors may arrange for disposal from the site in accordance with the following.

i. Scope - The scope of disposal work encompasses the draining, decontamination and disposal of PCB transformers with their fluids, decontamination solvent, capacitors and disposal of all PCB contaminated equipment. Decontamination procedures can either be conducted on-site or the transformer can be shipped to a PCB facility for decontamination and disposal.

ii. Quotations - All jobs must be planned and quoted in writing by a person who is certified and approved by the Department Designee.

iii. Supervision - All work must be performed under the supervision of a certified person. See Paragraph IX. B.3. for certification procedure.

iv. Equipment for Units 500 ppm and Over - All necessary equipment such as filter presses, hoses, etc. to be used for disposal of PCBs 500 ppm or greater must be obtained from a PCB facility, used on-site and returned directly to the originating PCB facility, or dispose of as PCB waste without entering any non-PCB facility.

v. Equipment for Units 50 to 499 ppm PCB - All necessary equipment for servicing of units less than 500 ppm of PCBs must be either obtained from a PCB Facility, used on-site, and returned directly to the originating shop or disposed of as PCB waste without entering the non-PCB Facility; or decontaminated immediately after use.

IX. BUSINESS PROCEDURES - PCB SERVICING (Cont.)

B. Facility Authorization/Work Scope (Cont.)

4. On-Site Work (Cont.)

b. Disposal (Cont.)

vi. Solid Waste - No PCB materials, including containers, are to be brought into any non-PCB facility. Waste will be sealed in EPA DOT approved drums at the customer's site, properly labelled and shipped:

- o To the designated PCB facility for accumulation and ultimate disposal, or
- o Directly to EPA approved sites, reference Paragraph VIII or,
- o Left at the customer's site as customer-owned material.

vii. Liquids - Liquids 50 ppm PCB and above must be properly prepared for shipment and shipped by an approved transporter (includes GE facilities with appropriate licenses):

- o To the designated PCB facility for accumulation and ultimate disposal,
- o Directly to EPA approved PCB waste disposal vendor (see Appendix "C") with specific authorization for liquids, or,
- o Left at the customer's site as a customer-owned material.

viii. Samples - All test samples from PCB transformers will be properly labelled, packaged and sent directly to the Test Laboratory without bringing them into a non-PCB facility.

ix. Safety - All employees with on-site work assignments will be fully instructed in the on-site safety procedures in the A&ES Safety Manual.

IX. BUSINESS PROCEDURES - PCB SERVICING (Cont.)

C. Testing Electrical Equipment For PCBs (Transformers, Regulators, Switches, and Electromagnets) - CUSTOMER OPTIONS

Prior to bringing electrical equipment into A&ES facilities for repair, customers must be advised of their testing options. Unless he advises us not to test, our policy is to test all equipment except Distribution Transformers rated 167 KVA single phase or 500 KVA three phase and below upon receipt, for PCB concentration.

1. Test - If the customer elects to conduct his own test, we must retest to confirm his results upon receipt of the unit at our A&ES facility and prior to starting any work. After agreeing on the PCB level in the oil, all work and procedures will be in strict accordance with EPA regulations and A&ES procedures for that transformer category.

2. Non-Test - If the customer elects not to test (and assumes under the regulation that the electrical equipment is in the PCB-contaminated electrical equipment category), we must advise him of his options as to how we will handle the repair.

   a. If he sends us the electrical equipment without fluids, there is no problem or price adder.
   b. If the oil, as received, is functionally acceptable and can be reused in his unit, we will hold it in a separate container and upon completion of repair, return it to his electrical equipment. An appropriate adder will be charged for special handling.
   c. If the oil is not functionally reusable, we can:

      i. Return the waste oil to the customer for his disposal with an appropriate charge for handling and containerizing, or,
      ii. Dispose of his waste oil at the apropriate surcharge of (See Appendix "G" for pricing guidelines).

3. Terms and Conditions - See Section IX. F. for required terms and conditions.

D. TRANSPORTATION

The highest environmental risk occurs during transport of PCBs. Every effort must be made to ensure that this aspect of the business is planned thoroughly and is under complete control.

1. General

a. All PCB liquids 50 ppm and above and PCB contaminated solids must be containerized before shipment in EPA approved drums properly labeled and dated (17E or 17C), or tankers properly labelled.

b. PCB articles such as transformers and capacitors will be shipped in containers which provide secondary containment such as trays, pans or drums.

c. Transportation plan for each job must be a part of the approved quotation process.

2. Carrier

a. Customer - Wherever possible, the customer should be requested to ship items directly to the PCB facility and assume responsiblity in transit or transfer that responsibility to a commercial carrier. Under these conditions, A&ES does not assume responsibility until the material is received at the A&ES facility.

b. A&ESO

In order to transport PCB items, A&ES facilities must must comply with the following:

i. The facility must have all appropriate state licenses for transportation,
ii. The facility truck, including leased trucks, must be equipped with emergency spill kit and emergency spill instructions,
iii. The driver must be appropriately trained in handling PCBs and control measures and accompanied by a helper (or a second vehicle). When the distance is more than 300 miles one-way, a second driver is required and a change-off plan for driving.
iv. The truck must be marked on each end and both sides with the required PCB label,

IX. BUSINESS PROCEDURES - PCB SERVICING (Cont.)

D. TRANSPORTATION (Cont.)

2. Carrier (Cont.)

b. A&ESO (Cont.)

v. The truck must carry the drums or articles (e.g. transformers) in containers which provide secondary containment such as trays or pans, and
vi. All applicable manifest requirements must be complied with.

Rental Trucks - Since A&ES has no control over rental trucks after they are returned to the owner, rental trucks must never be used for transporting PCB items.

c. Commercial Carriers - If A&ES arranges for commercial carrier transportation, we assume responsibility at the customer's facility.

Appendix "C" contains a list of A&ES approved commercial carriers. In order for other commercial carriers to transport PCB items, they must comply with the following:

i. Carrier fully understands the nature of the materials being shipped.
ii. Carrier fully understands their responsibility for any spill other than spill resulting from A&ES negligence.
iii. Carrier is a major company with resources (financial) to bear the responsibility.
iv. The carrier has the appropriate minimum insurance coverage which has been reviewed with A&ES legal counsel prior to consummating any agreement.
v. The carrier is licensed to transport PCBs in the required states. Documentation of all the above is required, including written approval to use the carrier by A&ES legal counsel prior to quoting the job.

IX. BUSINESS PROCEDURES - PCB SERVICING (Cont.)

E. QUOTATIONS AND PRICING

1. Quotation Approval

Quotations (scope, pricing, and transportation plan) must be prepared in writing by the authorized or certified PCB facility and approved by that facility manager. Jobs above $50,000 must be approved by the Department Designee.

2. Pricing Approval

It is recommended that firm pricing be used wherever possible. Any deviations from the Appendix "G" pricing guidelines must have the approval of the Department Designee.

F. TERMS AND CONDITIONS

1. Electrical Equipment Repairs and Servicing

The following terms and conditions must be included in all quotations for all electrical equipment repairs or servicing other than dry-type transformers or disbribution transformers rated 167 kVA single-phase or 500 kVA three-phase and below.

a. "All electrical equipment is subject to test (except as specified in Paragraph c below) before any work is performed thereon to determine the level of PCB concentration, if any, in the dielectric fluid. Electrical equipment will be classifed in one of four classifications by reference to the level of PCB concentrations as follows:

i. No detectable PCBs
ii. Detectable levels less than 50 ppm
iii. Levels of 50 or more ppm but less than 500 ppm
iv. Levels of 500 pm or more.

F. TERMS AND CONDITIONS (Cont.)

1. Electrical Equipment Repairs and Servicing (Cont.)

a. (Cont'd)

"The Company's normal practice in refilling electrical equipment will be to use good dielectric fluids having the same PCB concentration classification as the electrical equipment received and the Company shall not be liable to the customer for any increse in PCB concentration which does not amount to a change in classification.

b. "At the customer's request and an additional handling charge, the Company will segregate, store and reintroduce the liquids removed from his electrical equipment. Any additional liquids required to fill the unit will be from the Company's stock and shall be of the same classification as the unit, or at the customer's request and expense, liquids which have never previously been used in electrical equipment.

c. "At the customer's request the Company will refrain from testing the liquid for PCB concentrations. In such a case, the customer may, at his option:

i. Ship the unit to the Company with its liquid contents drained, and retained at the customer's site
ii. Pay an extra charge for special handling including segregation, storage and reshipment to the customer, all under the applicable EPA rules
iii. Pay an extra charge for special handling including segregation, storage and disposal, all under applicable EPA rules.

The Company shall not be liable to the Customer for any PCB concentration determined by any subsequent test."

2. Disposal

a. The following wording must be used in quotations to describe our disposal service. Representations differing from this must receive legal review.

F. TERMS AND CONDITIONS (Cont.)

2. Disposal (Cont.)

a. "When you want to dispose of PCBs, your purpose should be to accomplish complete disposal, both physically and legally. For your maximum protection from any environmental incident associated with PCB disposal, General Electric offers a firm price contract wherein:

i. We are familiar with the EPA regulations and continually monitor developments in that area
ii. We make reasonable efforts to maintain our procedures and storage facilities such as to be in compliance with the Federal EPA regulations
iii. Our prices are firm and not subject to future escalation and/or retroactive storage charges
iv. GE takes title to your material."

b. If the customer requires an in-depth discussion of terms and conditions use the following:

i. Except as specifically provided hereinafter the Company's (GE) standard terms and conditions of service (FN-872) or form ISE-5 (C) apply to the extent applicable.

ii. As used herein the word "Material" shall mean the material containing or contaminated with polychlorinated biphenyls (PCB), described in our proposal. Where concentrations of PCBs below 500 ppm are stated, attach certificates of analysis. Where certificates of analysis are not available, material will be considered to be contaminated at more than 499 ppm and disposal charges will be made based on the costs of disposing of such material.

iii. Company (GE) represents that it has knowledge of the hazards associated with the handling, storage and disposal of the PCBs and PCB contaminated materials, that it has experience in such handling, storage and disposal; and that it shall have instructed its personnel, (and to the extent necessary) subcontractors and agents (if any) in the proper safety procedures to be used in such handling, storage and disposal.

F. TERMS AND CONDITIONS (Cont.)

2. Disposal (Cont.)

b. iv. Customer warrants that it has full legal title to and the power and right to transfer title to the material and to arrange for disposal of the material (including, without limitation, all licenses or permits required by law or regulation to be obtained by the owner and/or generator of the material), that the material is as described in paragraph "ii" above, and that any containers provided by the customer are suitable containers for transportation and storage of the material under all applicable law (including, without limitation, regulations issued by the Environmental Protection Agency and the Department of Transportation).

v. Company (GE) will perform the services set forth in the quotation in accordance with all applicable laws and regulations. Company warrants that it will have obtained all licenses and permits required by law to engage in the activities required in connection with this transaction. Company represents and warrants that any storage site and any disposal facility to which the materials may be moved are in compliance with any and all federal, state and local laws and regulations pertaining thereto, including but not limited to, the regulations contained in 40 CFR Chapter 1, Part 761, and that they are suitable to receive and/or dispose of and may lawfully receive and/or dispose of the materials.

vi. Title to the material will pass to the Company (GE) when the material is loaded on a vehicle provided by the Company (if Company provides transportation) or when the material is off-loaded at a facility designated by Company (if customer provides transportation). In the event that the material is later determined to be of a nature or character different than that described in our quotation, title shall pass back to the customer and, unless otherwise agreed, Company may return the material to customer at customer's expense and customer shall be liable for

F. TERMS AND CONDITIONS (Cont.)

2. Disposal (Cont.)

b. vi. (cont'd)

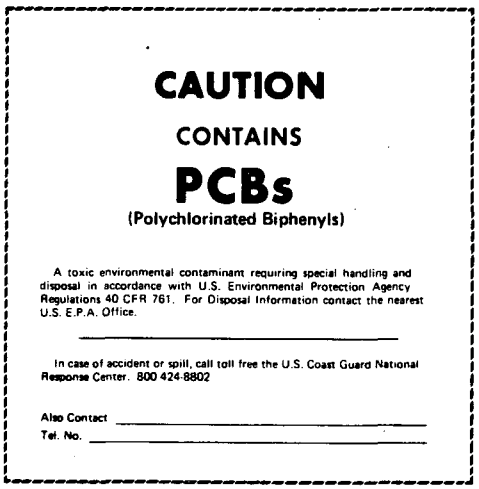
and shall indemnify Company against all losses, damages and claims caused by the material including any damage to the environment except if such losses, damages or claims are the result of the negligent or other tortious act or omission of Company.

vii. Company (GE) agrees to indemnify, defend and save customer (including its officers, directors, employees and agents) harmless from and against any liability, expense or loss resulting from the failure by Company, its agents or subcontractors to comply fully with every federal, state or local law, statute, regulation, rule, ordinance or government directive which directly or indirectly regulates or affects the collection, handling, storage, transportation or disposal of the materials to be disposed of by Company, hereunder and from and against any and all claims, suits and liabilities, directly or indirectly based upon damage to, or destruction of, any property (including the property of Company) or injury (including death) to any person arising out of or attributable to any negligent or willful act of the Company, its agents or subcontractors in the collection, handling, storage, transportation or disposal of the materials to be disposed of by Company hereunder. In the event of any liability arising out of the joint negligence of Customer and Company, each shall be liable to the other and any damaged third party in proportion to its relative degree of fault.

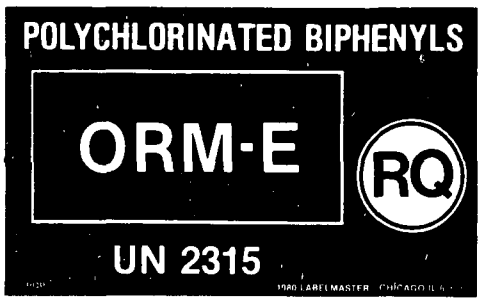
Paragraphs 8.(b) and 8.(c) of Company's Standard Terms and Conditions of service (FN-872), and paragraphs (a) and (b) of "Limitations of Liability" of Standard Conditions for Services - Form ISE-5 (C), shall not apply to claims under the indemnity of this paragraph except that in no event shall Company be liable to Customer for loss of use of property belonging to Customer or in Customer's case, custody or control.

APPENDIX "A"
MARKING-LABELS

EPA PCB Label (required for PCB containers, PCB articles, storage areas, and transport vehicles):



DOT Hazardous Substance Label (required for shipping containers and PCB articles only):



Order Information:

EPA PCB Caution Label Style PC-6
DOT Hazardous Substance Label Style RQP

Supplier:

Seton Name Plate Corporation
592 Boulevard
New Haven, Connecticut 06505
Phone: (203) 772-2520

Labelmaster
7525 N. Wolcott Avenue
Chicago, IL 60626
Phone: 8*(312) 973-5100

Ready Made Signs Company, Inc.
12-07 44th Avenue
Long Island City, N.Y. 11101
Phone: (212) 784-7000

W.H. Brady Co.
Signmark Division
727 W. Glendale Ave.,
P.O. Box 571
Phone: (414) 961-2233

PCB TRANSFORMER INSPECTION RECORD

SHOP/FACILITY LOCATION _____

PCB TRANSFORMER LOCATION _____

PCB TRANSFORMER SERIAL NUMBER _____

QUARTERLY INSPECTION							INSPECTION OF UNCORRECTED ACTIVE LEAKS * (DAILY)		
			If Leak(s) Found:						
Inspection Date	Person Performing Inspection	Any Leaks Found?	Location of Leak	Est. Amt. of Dielectric Fluid Released	Date of Cleanup, Containment, Repair or Replacement	Description of Corrective Action Taken	Inspection Date	Person Performing Inspection	Results of Containment and Daily Inspection

* Cleanup of released PCBs must be initiated as soon as possible but in no case later than 48 hours after its discovery.

APPENDIX "B" FORM 2

RECORD OF PCB MATERIAL RECEIVED
(50 ppm and above)

Location (Facility) _____

Prepared by _____

Date	Description	Quantity	Weight* (KG)	Received From	Job No.

* Annually (by July 1st) show total weight received during previous calendar year. PCB dielectric fluids (askarel, Pyranol) weigh 5.9 KG per gallon. Transformer oils (10c) weigh 3.4 KG per gallon.

APPENDIX "B" FORM 3

RECORD OF PCB MATERIAL SHIPPED
(50 ppm and above)

Location (Facility) _____

Prepared by _____

Date	Description	Quantity	Weight* (KG)	Transferred To	Manifest No.

* Annually (by July 1st) show total weight shipped during previous calendar year. PCBs dielectric fluids (Askarel, Pyranol) weigh 5.9 KG per gallon. Transformer oils (10c) weigh 3.4 KG per gallon.

APPENDIX "B" FORM 4
YEAR-END PCB MATERIAL ON HAND REPORT
(50 ppm and above)

Location (Facility) _____

Inventory Date _____

Prepared by & Date _____

Description	Quantity	Weight (KG)*
Containers		
New or reusable liquids		
Waste liquids		
Articles (Including transformers)		
Transformers		
Capacitors		
In-Use Equipment		
PCB Solids (not included above)		

* Weight of PCB liquids only. PCB contents of transformers may be estimated. PCB dielectric fluids (Askarel, Pyranol) weigh 5.9 KG per gallon. Transformer oils (10c) weigh 3.4 KG per gallon.

Compile by July 1st for the previous calendar year. Mail copy to:
A&ES Programs Department
Manufacturing and Engineering Support
Building 6, Room 233
Schenectady, NY 12345

APPENDIX "C"

APPROVED COMMERCIAL CARRIERS

A-1 Disposal Corp.
P.O. Box 301
400 Broad Street
Plainwell, MI 49080
(616) 685-9801

Sea Bright Environmental Co., Inc.
106 North Street
Wilder, KY 47101
(606) 581-0220

Tri-State Motor Transit Company
P.O. Box 113
Joplin, Missouri 64801
(800) 641-7591

APPROVED PCB DISPOSAL SITES

Facility	Capacitors	Properly Drained PCB Electrical Equipment	Contaminated Soil, Rags, and Other Debris	Properly Drained Containers	Asphalt (Contaminated)	Liquid 50 to 499 ppm PCBs	Liquid 500 ppm PCB or greater
Waste Management of Alabama Rt. 17 at Marker 630, PO Box 55 Emelle, AL 35459 (205) 652-9531 Toll Free # (800) 241-7829		X	X	X	X		
Casmalia Disposal 539 Ysidro Road PO Box 5275 Santa Barbara, CA 93108 (805) 969-5897		X	X	X			
Envirosafe Services of Idaho, Inc. PO Box 936 Mountain Home, ID 83647 (208) 587-8434		X	X	X	X		
US Ecology, Inc. 9200 Shelbyville Rd. Suite 526, PO Box 7246 Louisville, KY 40207 (502) 426-7160		X	X	X	(Landfill site is at Beatty, Nevada)		
CECOS International PO Box 619 Niagara Falls, NY 14302 (716) 282-2676		X	X	X			
SCA Chemical Services, Inc. 1550 Balmer Road Model City, NY 14107 (716) 754-8231		X	X	X			
CECOS International Of Ohio, Inc. 5092 Aber Road Williamsburg, OH 45176 (513) 681-5731		X	X	X	X		
Chem-Nuclear Systems, Inc. PO Box 1269 Portland, OR 97207 (503) 223-1912		X	X	X	X		
General Electric Co. Large Transformer Business Div. 100 Woodlawn Avenue Pittsfield, MA 01201 (413) 494-1110 extx 3378						X	X
Energy System Co. (ENSCO) P.O. Box 1975 El Dorado, Arkansas 71730 (501) 863-7173	X					X	X
Rollins Envionmental Services (TX) Inc. P.O. Box 609 Deer Park, TX 77536 (713) 479-6001	X					X	X

APPENDIX "E"

CERTIFIED ON-SITE SUPERVISORS FROM NON-PCB FACILITIES*

NAME	FACILITY	TELEPHONE NO.
Abele, D.C.	Charlotte, NC	8*287-3317
Aubrey, S.E.	San Francisco, CA	8*422-9666
Baisden, J.C.	Oak Brook, IL	8*383-3505
Bowers, James	Seattle, WA	8*443-2903/4/5
Burkhart, R.B.	New Orleans, LA	8*287-5148
Ceccato, J.S.	Southfield, MI	8*363-3235
Childress, G.F.	Norcross, GA	8*287-7725
Colvin, Thayne	Salt Lake, UT	8*454-4955
Cooper, J.	Chattanooga, TN	8*281-9311
Cranston, James	Portland, OR	8*444-5100
Diehsner, Thomas	Kansas City, KS	8*232-0290/91/92
Dinkel, D.	Birmingham, ALA	8*283-8153
Elke, M.E.	Seattle, WA	8*443-2956
Galarneau, D.T.	Portland, OR	8*444-5059
Hegarty, D.M.	Syracuse, NY	8*256-7214
Howell, K.J.	Portland, OR	8*444-5178
Ievins, Eriks	Cleveland, OH	8*343-3244
Lengyel, G.J.	Columbia, MD	8*275-5931
Malkowski, J.A.	Milwaukee, WI	8*386-1646
May, P.	Dallas, TX	8*352-6315
Merriott, Timothy	Oakland, CA	8*423-3011
Norman, L.I.	Long Beach, CA	8*433-5497
Pando, Debra	Oakland, CA	8*423-3217
Patterson, G.A.	Youngstown, OH	8*345-4305
Pawlowski, J.C.	King of Prussia, PA	8*243-6134
Pederson, Barry	Oakland, CA	8*423-3011
Phillips, J.M.	El Monte, CA	8*433-5181
Reagan, James	Los Angeles, CA	8*434-5011
Rutledge, William	Kansas City, MO	8*323-0290/91/92
Schafer, E.L.	Honolulu, Hawaii	8*808-833-2708
Siewierski, A.L.	Waltham, MA	8*266-7298
Vethe, C.W.	Minneapolis, MN	8*326-0368
West, Herb	Seattle, WA	8*443-2903/4/5
Willey, Francis	Kansas City, MO	8*323-0290/91/92

* NOTE: 1. The above on-site supervisors have provisional certification and must be re-trained and re-certified by December 31, 1983.

2. All supervisors from PCB Facilities must be re-trained and re-certified by December 31, 1983 and will be listed at that time.

APPENDIX "F"

DEFINITIONS

A familiarity with EPA's technical use of terms is essential to an understanding of the PCB rules. (Reference: Federal Register 5/31/79, page 31543, section 761.2 and 40 CFR Part 761 revisions of 8/25/82.) Definitions of major significance to this procedure include the following:

o Barrels/Drums	Approved DOT containers. DOT 17E for liquids and 17C for solids
o Burial Site	Approved EPA chemical waste landfill site.
o Distribute in Commerce	To sell (transfer of title); to introduce or deliver for introduction into commerce or to hold thereafter
o Manufacture (PCBs)	To produce, manufacture or import the PCB chemical substance or other substances with PCB impurities of 50 ppm or more. Does not include manufacture of PCB equipment.
o PCB	A PCB chemical substance or combination of substances that contains 50 ppm or greater of PCBs
o PCB Article	Any manufactured article other than a PCB container that contains PCBs and whose surface(s) have been in direct contact with PCBs. Includes capacitors, transformers, motors, pumps and pipes.
o PCB Article Container	Any package, can, bottle, bag, barrel, drum, tank or other device used to contain PCB articles or PCB equipment, and whose surface(s) has not been in direct contact with PCBs

APPENDIX "F" (Cont.)

DEFINITIONS

o PCB Capacitors	Classified as 3 types
Small	Contains less than 3 lbs. of dielectric fluid
Large high voltage	Contains 3 lbs. or more and operates at 2000 volts (AC or DC or above)
Large low voltage	Contains 3 lbs. or more and operates below 2000 volts (AC or DC)
o PCB Container	Any package, can, bottle, bag, barrel, drum, tank, or other device that contains PCBs or PCB articles and whose surface(s) has been in direct contact with PCBs
o PCB Contaminated Electrical Equipment	Any electrical equipment, including but not limited to transformers (including those used in railway locomotives and self propelled cars), capacitors, circuit breakers, reclosers, voltage regulators, switches, electromagnets, and cable, that contain 50 ppm or greater PCB but less than 500 ppm PCB
o PCB Equipment	Any manufactured item other than containers which contains a PCB article or other PCB equipment. Includes appliances, electronic equipment and lighting fixtures.
o PCB Item	Any PCB article, container or equipment that has as a part of it any PCBs at a concentration of 50 ppm or greater
o PCB Liquids	High concentration (500 ppm and above of PCBs) Low concentration (50 ppm to 499 ppm of PCBs)
o PCB Solids	Rags, disposable coveralls, other protective clothing, speedy dry, plastic covers, felt, etc. that have been in contact with liquid PCBs of 50 ppm and above

APPENDIX "F" (Cont.)

DEFINITIONS

o Posing an Exposure Risk to Food or Feed	Means being in any location where human food or or animal feed products could be exposed to PCBs released from a PCB item
o Processing	Preparation of PCBs, after their manufacture, for distribution in commerce in the same or different physical form from that in which they were received, or as a part of an article. Includes incorporation of a PCB article into equipment.
o Transformers	Four categories are:
PCB Transformers	Any transformers that contain 500 ppm PCB or greater
PCB-Contaminated Transformers	Contains 50 ppm PCB or greater but less than 500 ppm
Non-PCB Transformers	Contains less than 50 ppm PCB
Railroad Transformers	Used in locomotives or self-propelled cars

EXHIBIT 4

FULL CEIL. HT

8"

MASONRY (CONCRETE) CURB
8" HIGH x 9" THICK CONTINUOUS

ELEVATION 1/4"=1'

MAIN BUILDING EXTERIOR EAST WALL - FULL HEIGHT

BLOCK WALL

POSTED EMERGENCY INSTRUCTIONS

OIL METER

O.S.H.A. POSTING

SPILL NOTIFICATION PROCEDURE - POSTED

1A

MAIN 12"x12" H BEAM BLD. SUPPORT (TYP)
CRANE 12"x12" H BEAM SUPPORT (TYP)

4'

15'-4"

13'-10" INSIDE

6"

275 GAL TANK

6" CONC. FLOOR

TRANSFORMERS

55 GAL DRUMS

9"

38'-9"

9"

PLAN 1/4" = 1'

PCB WORK AREA

STORAGE UTILIZATION VARIES

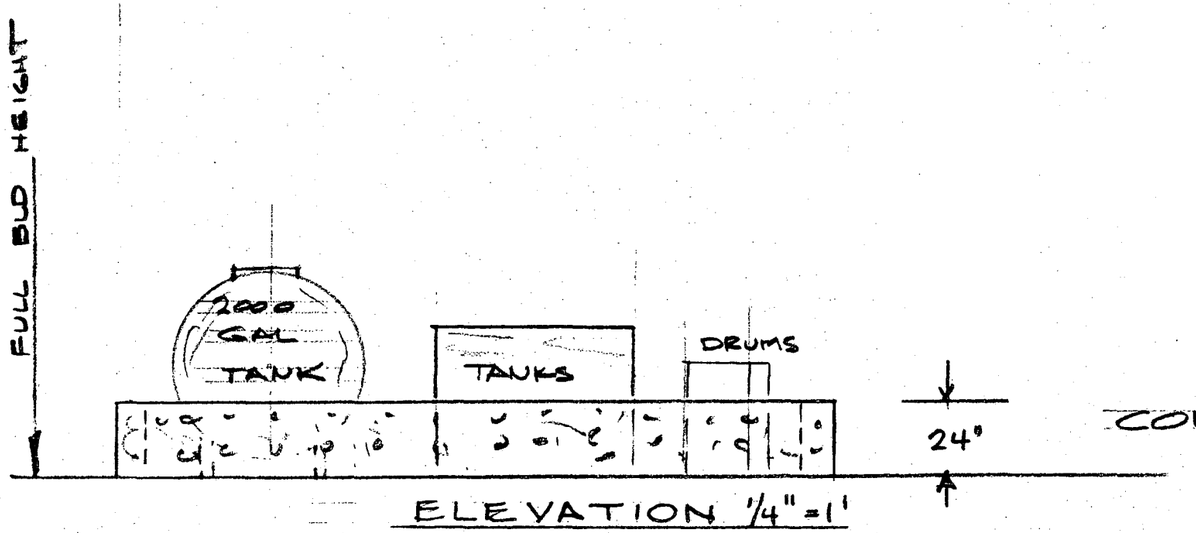
VOLUME OF CONCRETE CURBING
0% STORAGE - 343 CU. FT
50% STORAGE 171.5 CU. FT

PCB WORK AREA

SCALE 1/4"=1'	DR. G.H.E.
DATE 3-9-84	

GENERAL ELECTRIC APPARATUS SHOP
175 MILENS RD. TONAWANDA N.Y. 14150

GORDON H. ELWELL M.E. U.B. 1990 | DRAW # PCB # 101



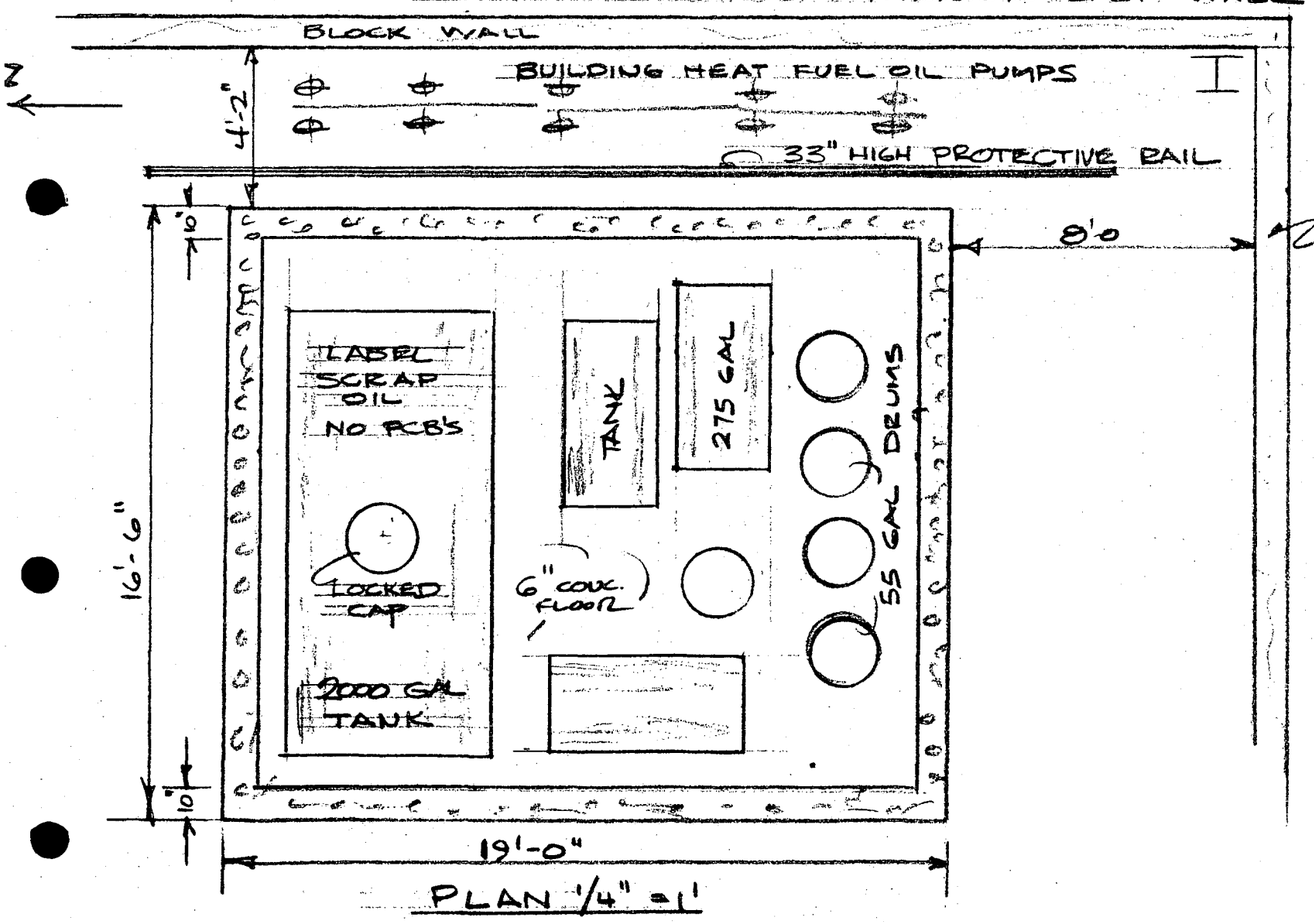
ELEVATION 1/4"=1'

CONCRETE CURB 24" HIGH 10" THICK

NOTE

STORAGE UTILIZATION VARIES
VOLUME OF CONCRETE CURB
0% STORAGE- 514 CU. FT
50% STORAGE- 257 CU. FT

MAIN BUILDING EXTERIOR EAST WALL



PLAN 1/4" = 1'

WASTE OIL STORAGE AREA

WASTE OIL STORAGE AREA		
SCALE 1/4"=1'		DRW. G.H.E
DATE: 3-9-84		
GENERAL ELECTRIC APPARATUS SHOP 175 MILENS RD. TONAWANDA, N.Y. 14150		
GORDON H. ELWELL M.E. UB 1950 Gordon H Elwell		DRAW # PCB #102

N

MISC. STORAGE

26'-0

9"

CURBING 16" HIGH x 9" THICK

9"

MAIN BLD. WALL

FLOURESCENT LITE

55 GAL. DRUMS

6" CONC. FLOOR

LOCKED 8'0x8'0 O.H. DOOR

PLAN 1/4"=1'

NOTE
STORAGE UTILIZATION VARIES
VOLUME OF CONCRETE CURB
0% STORAGE — 526 CU.FT
50% STORAGE — 263 CU.FT.

PAN ROOFING

TRUSS (METAL) ROOF SYSTEM

23'0"

BLDG. WALL

10'-8"

FLOOR LINE

ELEVATION 1/4"=1'

NOTE:
ACCESS TO PCB STORAGE BY
8'0x8'0 O.H. DOOR

PCB STORAGE AREA LOCKED SEPARATE BLD.
ATTACHED TO MAIN BLD. - SOUTH EAST CORNER

PCB STORAGE AREA

SCALE 1/4"=1'		DRW. CHE
DATE: 3-9-84		

GENERAL ELECTRIC APPARATUS SHOP
175 MILEUS RD. TONAWANDA, N.Y. 14150

GORDON H. ELWELL M.E. UB 1950
Gordon H. Elwell

DRAWING # PCB # 103