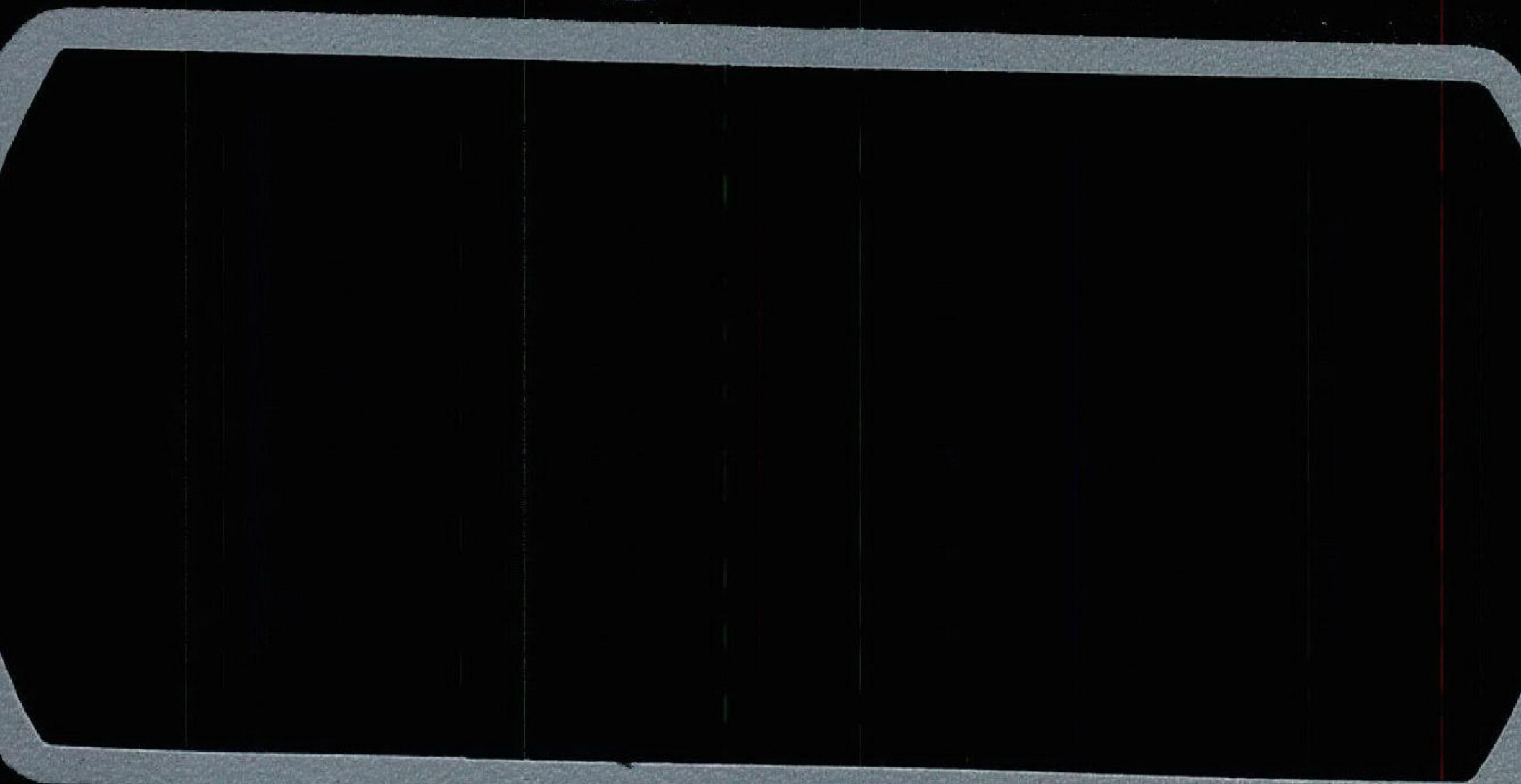


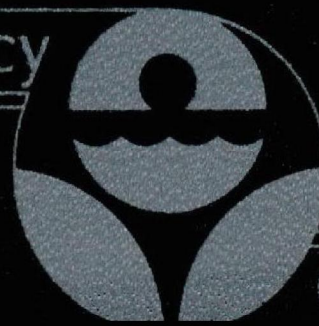
NEIC





National Enforcement Investigations Center, Denver

U.S. Environmental Protection Agency



Office of Enforcement

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
OFFICE OF ENFORCEMENT AND COMPLIANCE MONITORING

*EPA-330/2-89-019*

**ENVIRONMENTAL AUDIT**

AMERECO ENVIRONMENTAL SERVICES, INC.  
Kingsville, Missouri

DEFENSE REUTILIZATION AND MARKETING SERVICE  
Contract Numbers DLA 200-87-0044 and 0048

April 1989

John Ellison

NATIONAL ENFORCEMENT INVESTIGATIONS CENTER  
Denver, Colorado

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US Environmental Protection Agency  
345 Courtland Street  
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## INTRODUCTION

The Department of Defense (DOD), Defense Reutilization and Marketing Service (DRMS) awarded AmerEco Environmental Services, Inc., (AmerEco) four contracts [Appendix A] for PCB/PCB item transport and disposal. AmerEco completed two contracts which included removal and disposal of PCB/PCB items generated at specified DOD installations during each 12-month contract period which ended in 1988. Additionally, the DOD flew PCBs/PCB items from DOD radar installations in Canada to Robins Air Force Base, Warner Robins, Georgia. AmerEco then picked up these PCBs/PCB items at Robins Air Force Base under terms of one of the existing contracts. When sufficient PCBs/PCB items accumulate at one or more DOD storage facilities, DRMS issues a delivery order for their removal. AmerEco transports most PCBs/PCB items to their facility in Kingsville, Missouri [EPA ID No. MOD980962849] for processing and then transports PCB solids for landfill disposal and PCB liquids and large PCB capacitors for treatment by incineration.

Landfill facilities used included :

- Chemical Waste Management, Inc., Emelle, Alabama
- CWM Chemical Services, Inc., Model City, New York
- Envirosafe Services of Idaho, Inc., Grandview, Idaho
- U.S. Ecology, Beatty, Nevada

Incineration facilities used included:

- Rollins Environmental Services, Inc., Deer Park, Texas
- CWM Chemical Services, Inc., Chicago, Illinois.

AmerEco contracts DLA 200-87-D-0044 and 0048 were audited during the week of January 9, 1989, by the EPA National Enforcement Investigations Center (NEIC) and DRMS. The audit evaluated both DOD domestic and Canadian PCB shipments. The audit objectives were to:

- Determine if PCB management practices of AmerEco and their subcontractors complied with Federal and State environmental regulations and with environmental requirements of the DRMS contracts
- Determine if DRMS PCB management practices complied with Federal and applicable State environmental regulations.

The audit included:

- Review of Dun and Bradstreet reports and EPA databases to gather background information and/or compliance history regarding AmerEco and selected subcontractors
- Inspection of selected PCB records and the PCB handling and storage facility at AmerEco
- Inspection of DRMS records and the Robins Air Force Base PCB storage building at Robins Air Force Base, Warner Robins, Georgia
- Inspection of selected PCB records and the PCB handling and disposal facility at Chemical Waste Management, Inc., Emelle, Alabama (CWM-Emelle)
- Tracking DOD PCBs/PCB items manifested to CWM Chemical Services, Inc., Model City, New York (CWM - Model City); EnviroSafe Systems of Idaho, Inc., Grandview, Idaho (ESI); and Rollins Environmental Services, Inc., Deer Park, Texas (RES).

The audit focused on cradle to grave manifest tracking of selected DRMS PCB wastes from contracts DLA 200-87-D-0044 and 0048. AmerEco provided manifests and inventory records confirming receipt of all 149 loads for which records were requested. Fifteen manifested loads were selected for a complete

record check which included weight tickets, unloading logs, chemical analysis, inventory records, loading logs, and disposal manifests. Additionally, the PCB facility was inspected including storage areas, laboratory, loading docks, tank farm, recordkeeping areas, and processing areas. The 1987 Annual Document, as required by 40 CFR 761.180, was also reviewed.



## SUMMARY OF FINDINGS

The environmental audit of PCB management practices associated with the DRMS contracts revealed that AmerEco could not account for all PCBs/PCB items and did not comply with two TSCA/State regulations and four DRMS contract requirements. The audit did not reveal noncompliance by sub-contractor CWM-Emelle and the DRMS office at Robins Air Force Base (DRMO Robins). Although noncompliance was not directly observed at DRMO Robbins, records for dates PCBs/PCB items were placed in storage at other DOD facilities indicate storage for disposal exceeding 1 year. Federal regulations require disposal within 1 year of when PCBs/PCB items are taken out of service and placed in storage for disposal. Specific instances of noncompliance with Federal/State regulations and DRMS contract requirements are discussed below.

### AMERECO ENVIRONMENTAL SERVICES, INC., KINGSVILLE, MISSOURI

AmerEco provides transportation for DRMS PCBs/PCB items but sub-contracts all treatment and disposal. This includes transportation both from the DOD installation to AmerEco and from AmerEco to the treatment or disposal facility. Most wastes are transported to AmerEco's storage and processing facility before shipment to a disposal facility. PCB transformers are drained and flushed and PCBs/PCB items are consolidated/bulked at AmerEco's facility.

The inspection of AmerEco revealed the following:

### PCBs/PCB Items Weight and Volume Discrepancies

Treatment and disposal facilities' measurements of PCB/PCB item weights and volumes often did not agree with AmerEco's manifested weights and volumes. The manifested weights averaged about 14% higher than the weights measured by three landfill disposal facilities and the manifest volumes averaged about 16% higher than those measured by a treatment facility.

### Compliance with Federal/State Regulations

PCBs are regulated in Missouri under hazardous waste regulations found in the Code of State Regulations, Title 10, Department of Natural Resources, Division 25, Chapter 13 (10 CSR 25-13). The State has adopted 40 CFR 761 by reference and also require PCB facilities such as AmerEco to comply with 40 CFR 265 Subparts B through D and F through Q.

Based on these findings and requirements previously listed, AmerEco did not comply with the following Federal/State regulations:

<u>FEDERAL/STATE REGULATION</u>	<u>DESCRIPTION OF NONCOMPLIANCE</u>
10 CSR 25-13.010(5)(C)2*	<u>Site Security</u> : AmerEco did not have a fence around the active portion of the facility. Access was observed during the inspection when a stray dog walked into the PCB storage area.
40 CFR 761.180(b)(3)/ 10 CSR 25-13.010(3)(E)1 and 2D and F	<u>Recordkeeping Requirements</u> : AmerEco prepared annual documents based mostly on estimates. Weights and volumes of PCBs/PCB items were not always measured at AmerEco. Large weight/ volume discrepancies were not corrected in the annual documents.

### Compliance with DRMS Contract Requirements

Additionally, AmerEco did not comply with the following DRMS contract requirements:

<u>DRMS CONTRACT REQUIREMENT</u>	<u>DESCRIPTION OF NONCOMPLIANCE</u>
Section C.1	<u>Disposal of PCB and PCB Contaminated Material</u> : AmerEco did not comply with 40 CFR 761 and 10 CSR 25.12.020 recordkeeping requirements, as discussed above.

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\* Compliance with 40 CFR 265.14 is required by reference.

## Section C.5

Department of Transportation Requirements: AmerEco manifested PCB shipments listing weights up to 65,043 pounds. Personnel from the Missouri Department of Natural Resources, which has a grant to enforce DOT requirements, indicated a maximum legal load would be 40,000 to 45,000 pounds for the type of trucks used by AmerEco. Fourteen of 72 manifested PCB shipments to CWM-Emelle listed weights greater than 50,000 pounds.

## Section C.10

Permits: AmerEco did not comply with State regulations for site security, as discussed above.

## Section F.9d

Variation in Quantities (Delivery Orders): The contract requires adjustments when actual delivery quantities are more than 3% different than the quantity stated in the delivery order. AmerEco did not notify the government and no adjustment was made in delivery order weights and volumes which exceeded this limit in AmerEco's favor. However, AmerEco often requested changes to receive more money if actual delivery quantities were greater than the stated delivery order quantity.

The following AmerEco management practices probably contributed to the weight and volume discrepancies:

- In most cases, AmerEco did not weigh material received and instead used weights/volumes provided by DRMS (most commonly nameplate weight for PCB transformers).
- AmerEco drained transformers and used nameplate volumes instead of measuring actual volume.
- PCB analysis at AmerEco was limited to screening for concentration. The specific gravity was not measured and factors for PCB weight were assumed, (e.g., mineral oil 7.3 pounds per gallon, >10,000 ppm PCB 13 pounds per gallon).
- In most cases, manifested weights and volumes for PCBs/PCB items shipped to treatment or disposal facilities were based on reported or estimated/calculated weights and volumes, not on actual measurements.

- AmerEco was not maintaining original records for some information entered onto computer inventory records, (e.g., unloading logs, pro-cessing information).

#### DEPARTMENT OF DEFENSE. DEFENSE REUTILIZATION AND MARKETING SERVICE

Department of Defense PCBs/PCB items were picked up by AmerEco at many installations. AmerEco records for dates of when these items were placed in storage for disposal indicate storage periods by DOD/DRMS greater than 1 year. Actual DOD or DRMS records were not observed except at DRMO Robins where no storage periods exceeding 1 year were observed. Federal Regulations require disposal within 1 year of when PCBs/PCB items are taken out of service and placed in storage for disposal.

The DOD airlifted PCBs/PCB items from DOD installations in Canada to Robins Air Force Base. AmerEco picked up eight of the nine shipments of these items from Canada. Although special care was taken in transportation and initial processing at AmerEco, the Canadian PCBs/PCB items were then processed the same as and mixed with domestic shipments. After the processing of Canadian shipments began in the summer of 1988, shipments from AmerEco to disposal facilities usually contained both domestic and Canadian PCBs/PCB items. Weight/volume discrepancies were noted for these shipments also.

## ENVIRONMENTAL AUDIT RESULTS

These findings are based on inspections, record review, and tracking 185 manifests PCB items on 72 manifests were tracked from the DOD facility to final disposal sites. The audit emphasized review of records required by Federal/State regulations and DRMS contract requirements.

### AMERECO ENVIRONMENTAL SERVICES, INC., KINGSVILLE, MISSOURI

AmerEco currently operates under interim status as a PCB facility per Missouri Hazardous Waste Regulations. AmerEco operates as a PCB broker and storage for disposal facility and is not required to have any EPA approvals for these activities. EPA Region VII approvals of proposed transformer decommissioning and PCB oil detoxification operations are pending. AmerEco began operations in June 1983 as "PCB Disposal Systems, Inc.," the name was changed to AmerEco in December 1986.

AmerEco primarily uses Chemical Waste Management, Inc., Emelle, Alabama; SCA Chemical Services, Inc., Model City, New York; Envirosafe Services of Idaho, Inc., Grandview, Idaho; and U.S. Ecology, Beatty, Nevada, for landfilling PCB solids and Rollins Environmental Services, Inc., Deer Park, Texas and SCA Chemical Services, Inc., Chicago, Illinois for incinerating PCB liquids.

AmerEco has had four DRMS PCB contracts [Appendix A] beginning in November 1985 through September 1988. The contracts were originally estimated at \$3,226,784 total; however, \$7,083,204 total was actually obligated. AmerEco currently has no DRMS contracts, but is still submitting contract bids. When the DOD decided to dispose of PCBs/PCB items from 17 radar installations in Canada, an existing AmerEco contract (DLA 200-87-D-0044) was extended and additional delivery orders were issued. Nine weekly shipments of PCBs/PCB items were flown to Robins Air Force base by DOD where the first eight shipments\* were picked up by AmerEco and transported to

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\* The ninth shipment was picked up Aptus, Coffeyville, Kansas which is the current PCB contractor for DRMO Robins.

AmerEco's Missouri facility for processing. DRMS provided extra personnel to monitor these retrograde activities. A DRMS monitor observed the unloading and weighing of each item from the Canadian shipments at AmerEco. At EPA Headquarters' request, EPA Region VII inspected and reported on AmerEco's handling of DOD PCB shipments from Canada.

The NEIC audit evaluated AmerEco's procedures and regulatory compliance for both DOD domestic and Canadian PCB shipments. For example, AmerEco was awarded contract DLA 200-87-D-0044 for six geographic areas including DOD installations in GA, SC, AR, TN, MS, AL, LA, TX, OK, Puerto Rico, and Panama. PCBs/PCB items from selected DOD installations in these areas, retrograde PCBs/PCB items from DOD installations in Canada, and from selected DOD installations from contract DLA 200-87-D-0048 (New England, Central Atlantic, Midwest, and Plains States) were tracked through AmerEco to final treatment and disposal. Processing of Canadian PCBs/PCB items at AmerEco after the initial unloading and weighing was similar to domestic PCB shipments. After processing of Canadian shipments began in the summer of 1988, shipments from AmerEco to disposal facilities usually contained both domestic and Canadian PCBs/PCB items. Weight/volume discrepancies were noted for these shipments also.

#### Compliance with Federal/State Regulations

AmerEco was not in compliance with Federal/State requirements for recordkeeping and State requirements for site security.

Manifested weights and volumes did not always match between AmerEco and treatment/disposal facilities. The volume of PCB liquids manifested to Rollins Environmental Services, Inc., Deer Park, Texas, was often different than the volume actually treated. The volume received was often less than the volume manifested [Table 1, Appendix B]. AmerEco claimed the difference was due to measuring procedures. AmerEco used computer records

Table 1  
VOLUME DISCREPANCIES IN PCB SHIPMENTS  
AMERECO ENVIRONMENTAL AUDIT

January 1989

DRMS Contractor:  
AmerEco Environmental Services, Inc.  
Kingsville, MO  
EPA ID No. MOD980962849

TSDf:  
Rollins Environmental Services, Inc.  
Deer Park, TX  
EPA ID No. TS055141378

Date Manifested	Manifest No.	Manifest Volume	Date Received	Volume* Received	Volume Difference** (Gallons)	Percent Difference***
08/19/87	355361	4,000	08/20/87	4,118	-118	-3
09/09/87	318908	6,001	09/10/87	5,117	884	17
09/10/87	318906	4,000	09/11/87	3,288	712	22
09/23/87	354780	6,230	09/24/87	4,610	1,620	35
02/23/88	485506	5,871	02/25/88	5,357	514	10
03/08/88	488141	5,936	03/09/88	5,565	371	7
06/10/88	461819	4,009	06/11/88	3,514	495	14
07/26/88	488353	4,005	07/27/88	3,640	365	10
08/03/88	472302	4,002	08/04/88	3,454	548	16
08/23/88	472217	4,219	08/24/88	3,668	551	15
08/30/88	472231	4,002	08/31/88	3,600	402	11
09/20/88	472331	5,353	09/21/88	3,972	1,381	35
09/27/88	472306	<u>3,532</u>	09/28/88	<u>2,580</u>	<u>952</u>	<u>36</u>
	Totals	61,160		52,483	8,677	16.5

- \* Based on weight as measured at Rollins and AmerEco Specific Gravity Factor  
 \*\* Difference between manifest volume and volume received  
 \*\*\* Volume difference divided by volume received X100

and reportedly checked truck volumes with a calibrated stick. Rollins reportedly used specific gravity and weight to determine volume. In most cases, AmerEco's computer records were not measured volumes. AmerEco admitted some transformers were not full and some transformers had no liquid inside. For example, a transformer from contract 87-D-0044 delivery order No. 136 listed on manifest F108A was received at AmerEco on June 20, 1988, and was listed as containing 42 gallons of PCB liquid. Laboratory records indicate no sample was collected and operations personnel indicated the transformer was empty. However, the computer inventory report lists 42 gallons of PCB liquid from this transformer was sent for disposal on manifest J1385 on September 18, 1988. DRMS is charged for disposal of this "phantom" volume and the manifested volume is short 42 gallons. AmerEco indicated it was easier "to make the records look good" than to correct DRMS records and get change orders approved. Additionally, AmerEco usually drained transformers without measuring actual volumes. This would account for some differences in PCB liquid volumes.

The weight of PCB solids manifested to CWM-Emelle was often different than measured weight at the facility and usually the weight measured by CWM-Emelle was less than the weight manifested [Table 2]. CWM-Emelle personnel indicated AmerEco was not necessarily aware of these discrepancies since the weight difference was not marked on the manifest and CWM-Emelle invoices AmerEco based on cubic feet of waste not weight. CWM-Emelle personnel check each shipment for piece count and serial numbers and no piece count or serial number discrepancies were noted. AmerEco indicated that except for retrograde items, most DRMS transformers were not weighed. DRMS reported weight came from transformer nameplates or actual weight. Currently there is no accounting for differences in manifested versus landfill facility measured weights. If PCBs/PCB items were not incinerated or landfilled then AmerEco was not in compliance with 40 CFR 761.60 disposal requirements.

Similarly, the difference between manifest weight and weight measured at CWM Chemical Services, Inc., Model City, New York and EnviroSafe Services of Idaho, Inc., Grandview, Idaho for AmerEco PCB shipments was checked for 10 and 14 shipments, respectively. The results were similar to those at CWM-Emelle and are presented in Table 3 and 4. PCBs/PCB items



Table 2  
WEIGHT DISCREPANCIES IN PCB SHIPMENTS  
AMERECO ENVIRONMENTAL AUDIT

January 1989

DRMS Contractor:  
AmerEco Environmental Services, Inc.  
Kingsville, MO  
EPA ID No. MOD980962849

Disposal Facility:  
Chemical Waste Management, Inc.  
Emelle, AL  
EPA ID No. ALD000622464

Date Manifested	Manifest No.	Manifest Weight	Date Received	Weight Received	Weight Difference* (Pounds)	Percent Difference**
06/03/87	293611	50,780	06/05/87	41,660	9,120	22
08/07/87	293613	43,940	08/10/87	40,940	3,000	7
09/07/87	293617	42,337	09/08/87	38,340	3,997	10
09/11/87	293620	46,844	09/15/87	32,920	13,924	42
09/11/87	293621	33,800	09/14/87	25,980	7,820	30
09/18/87	293622	44,129	09/22/87	39,980	4,149	10
10/02/87	293623	41,714	10/06/87	40,380	1,334	3
10/12/87	293624	36,924	10/13/87	41,980	-5,055	-12
10/23/87	293627	44,927	10/26/87	37,920	7,007	18
12/04/87	293628	44,192	12/07/87	40,440	3,752	9
12/05/87	293629	59,001	12/07/87	44,700	14,301	32
12/04/87	293630	49,555	12/07/87	39,320	10,235	26
12/24/87	293631	41,130	12/29/87	39,260	1,870	5
01/07/88	293633	51,975	01/11/88	40,960	11,015	27
01/08/88	293634	45,429	01/11/88	40,920	4,509	11
01/08/88	293635	47,893	01/11/88	38,680	9,213	24
01/08/88	293636	50,154	01/12/88	42,380	7,774	18
01/26/88	293637	44,528	02/01/88	40,860	3,668	9
02/04/88	293638	51,542	02/09/88	41,260	10,282	25
02/22/88	293639	44,345	02/24/88	40,980	3,365	8

Table 2 (cont.)

Date Manifested	Manifest No.	Manifest Weight	Date Received	Weight Received	Weight Difference* (Pounds)	Percent Difference**
03/06/88	293640	39,822	03/07/88	40,160	-338	-1
03/10/88	293641	43,486	03/14/88	40,860	2,626	6
03/18/88	293642	43,967	03/21/88	41,060	2,907	7
03/24/88	293643	46,377	03/28/88	35,720	10,657	30
04/08/88	293645	65,043	04/11/88	41,320	23,723	57
05/06/88	293675	50,620	05/09/88	40,940	9,680	24
05/09/88	293676	46,157	05/10/88	33,440	12,717	38
05/12/88	293677	45,869	05/17/88	38,500	7,369	19
04/15/88	293678	51,985	04/18/88	40,940	11,045	27
05/26/88	293679	54,512	06/01/88	40,680	13,832	34
06/09/88	293680	43,099	06/14/88	40,580	2,519	6
06/03/88	293681	56,345	06/07/88	40,460	14,885	39
06/03/88	293682	43,913	06/06/88	40,720	3,193	8
06/17/88	293683	45,857	06/20/88	41,860	3,997	10
06/17/88	293684	43,742	06/20/88	40,860	2,882	7
09/14/88	293685	37,123	09/15/88	34,320	2,803	8
12/30/87	293689	47,748	01/04/88	No Receipt Control Form		
08/07/87	293695	43,928	08/11/87	40,540	3,388	8
07/10/87	293700	38,780	07/13/87	35,320	3,460	10
07/10/87	293712	41,786	07/13/87	40,140	1,646	4
06/15/87	293716	33,400	06/17/87	40,700	-7,300	-18
07/14/87	293717	40,164	07/15/87	37,240	2,924	8
07/17/87	293718	40,360	07/20/87	39,500	860	2
07/17/87	293719	40,732	07/20/87	40,760	-28	0
07/17/87	293722	41,980	07/21/87	39,520	2,460	6
07/17/87	293723	46,629	07/21/87	40,300	6,329	16
07/24/87	293726	40,023	07/29/87	40,660	-637	-2
07/27/87	293728	46,186	07/28/87	41,200	4,986	12
07/27/87	293729	41,265	07/29/87	35,620	5,645	16

Table 2 (cont.)

Date Manifested	Manifest No.	Manifest Weight	Date Received	Weight Received	Weight Difference* (Pounds)	Percent Difference**
06/15/87	293730	43,257	06/17/87	38,260	4,997	13
05/27/87	293731	49,674	06/02/87	38,940	10,734	28
06/24/88	403301	32,217	06/27/88	41,010	-8,803	-21
06/24/88	403302	46,536	06/28/88	41,220	5,316	13
09/22/88	403328	46,076	09/27/88	41,660	4,986	12
08/19/88	403330	47,492	08/23/88	41,360	6,132	15
08/19/88	403331	48,629	08/24/88	41,080	7,549	18
08/12/88	403332	55,679	08/15/88	41,000	14,679	36
08/05/88	403334	62,360	08/08/88	39,580	22,780	58
07/29/88	403335	49,116	08/01/88	41,120	7,996	19
07/29/88	403336	54,757	08/02/88	41,180	13,577	33
07/29/88	403337	46,018	08/01/88	40,920	5,098	12
07/22/88	403338	47,619	07/26/88	39,480	8,139	21
07/22/88	403339	42,401	07/26/88	38,440	3,961	10
07/22/88	403340	48,580	07/27/88	34,200	14,380	42
07/22/88	403342	55,624	07/25/88	39,060	16,564	42
07/15/88	403344	28,791	07/18/88	24,040	5,751	24
07/15/88	403345	50,683	07/18/88	41,960	8,723	21
07/15/88	403346	52,845	07/18/88	40,900	11,945	29
07/08/88	403348	43,399	07/11/88		Truck was not tared	
07/08/88	403349	56,294	07/11/88	40,500	15,794	39
06/09/88	403350	42,262	06/14/88	41,380	882	2
06/03/88	403351	51,146	06/07/88	<u>40,960</u>	<u>10,186</u>	<u>25</u>
			Totals	2,761,810	465,876	16

\* Difference between manifest weight and weight received

\*\* Weight difference divided by weight received X100

Table 3  
WEIGHT DISCREPANCIES IN PCB SHIPMENTS  
AMERECO ENVIRONMENTAL AUDIT

January 1989

DRMS Contractor:  
AmerEco Environmental Services, Inc.  
Kingsville, MO  
EPA ID No. MOD980962849

TSDf:  
CWM Chemical Services, Inc.  
Model City, NY  
EPA ID No. NYD049836679

Date Manifested	Manifest (NY A)	Manifest Weight	Date Received	Weight Received	Weight Difference* (Pounds)	Percent Difference**
10/03/87	3306240	43,585	10/05/87	40,920	2,665	6
10/15/87	3306363	47,520	10/20/87	41,200	6,320	15
11/13/87	3306442	31,696	11/17/87	30,160	1,536	5
11/19/87	3306464	40,595	11/23/87	40,380	215	0.5
12/11/87	5887791	44,605	12/14/87	39,960	4,645	12
01/07/88	5153598	53,993	01/11/88	41,560	12,433	30
01/15/88	5153607	42,682	01/19/88	37,580	5,102	14
01/22/88	5887845	46,426	01/25/88	40,800	5,626	14
02/05/88	5887917	30,944	02/08/88	39,380	-8436	-21
02/19/88	5887962	<u>53,782</u>	02/22/88	<u>40,740</u>	<u>13,042</u>	<u>32</u>
	Totals	435,828		392,680	43,148	11

\* Difference between manifest weight and weight received

\*\* Weight difference divided by weight received X100

Table 4  
WEIGHT DISCREPANCIES IN PCB SHIPMENTS  
AMERECO ENVIRONMENTAL AUDIT

January 1989

DRMS Contractor:  
AmerEco Environmental Services, Inc.  
Kingsville, MO  
EPA ID No. MOD980962849

TSDF:  
Envirosafe Services of Idaho, Inc.  
Grandview, Idaho  
EPA ID No. IDD073114654

Date Manifested	Manifest No.	Manifest Weight	Date Received	Weight Received	Weight Difference (Pounds)	Percent Difference
09/18/87	J187W	39,479	09/23/87	40,000	-521	-1
10/12/87	K097W	46,126	10/14/87	37,460	8,666	23
10/23/87	K237S	39,160	10/27/87	39,460	-300	-1
10/23/87	K237V	42,233	10/27/87	35,310	6,923	19
11/02/87	K307U	36,260	11/04/87	36,580	-220	-1
11/09/87	L067V	50,443	11/11/87	39,320	11,123	28
11/25/87	L137V	40,050	12/01/87	40,840	-790	-2
11/25/87	L277T	48,323	12/01/87	41,020	7,303	18
01/14/88	A158T	39,450	01/18/88	39,880	-430	-1
01/14/88	A158U	36,770	01/18/88	37,240	-470	-1
03/10/88	C118U	40,400	03/14/88	40,780	-380	-1
04/22/88	D228U	38,130	04/28/88	41,060	-2,930	-7
05/13/88	E138W	37,720	05/16/88	38,580	-830	-2
05/13/88	E138X	37,840	05/16/88	<u>38,600</u>	<u>-760</u>	<u>-2</u>
Totals				546,130	26,384	5

from different sources cannot be compared due to mixing when manifested to treatment and disposal facilities. ESI received several loads that contained PCB solids, articles, and capacitors and only small weight differences were noted. However, for loads of transformers, large weight differences similar to CWM-Emelle and CWM-Model City were noted.

AmerEco's recordkeeping includes computer inventories which are based on information not actually measured at AmerEco. AmerEco also entered information onto computer records and did not keep the original operating records. As a result of these procedures, the 1987 Annual Document is inaccurate and does not comply with 40 CFR 761.180(b)(3). According to AmerEco personnel the weight and volume discrepancies were not corrected in the Annual Document for 1987. The regulations allow weight/volume of PCB liquids to be calculated if the internal volume of containers and transformers is known and included in the Annual Document, together with any assumptions on the density of PCBs contained in the containers or transformers. AmerEco indicated they only estimated many volumes. Also, AmerEco did not include assumptions on PCB densities in the Annual Document.

Missouri requires PCB facilities to comply with 40 CFR 265 subparts B through D and F through Q. AmerEco did not have a fence around the active portion of the facility. Thus, AmerEco was not in compliance with 40 CFR 265.14 by reference. During the inspection, a stray dog walked into the PCB storage area.

#### Compliance with DRMS Contract Requirements

AmerEco is responsible for complying with all contract requirements and ensuring similar compliance by all subcontractors. The company did not comply with four provisions of contracts DLA 200-87-D-0044 and 0048, as discussed below.

#### Section C.1 (Disposal of PCB and PCB Contaminated Material)

AmerEco was responsible for complying with 40 CFR 761 regulations. PCBs/PCB items have not been managed in compliance with applicable TSCA regulations, as previously discussed.

#### Section C.5 (Department of Transportation Requirements)

AmerEco manifested PCB shipments listing weights up to 65,043 pounds. Personnel from the Missouri Department of Natural Resources, which enforce DOT requirements in Missouri, indicated a maximum load would be 40,000 to 45,000 pounds for the types of trucks used by AmerEco. Fourteen of 72 manifested PCB shipments to CWM-Emelle [Table 2] listed weights greater than 50,000 pounds.

#### Section C.10 (Permits)

AmerEco was responsible for complying with all local and State requirements. PCBs/PCB items have not been managed in compliance with applicable State site security regulations, as previously discussed.

#### Section F.9d [Variation in Quantities (Delivery Orders)]

The contract requires adjustments to delivery quantities (amount of material actually picked up) more than 3% above or below the quantity stated in the delivery order, AmerEco did not notify the government and no adjustment was made in delivery order weight/volume variances which exceeded this limit in AmerEco's favor. However, AmerEco often requested changes and more money when actual delivery quantities were greater than stated delivery order quantities.

#### CHEMICAL WASTE MANAGEMENT, INC., EMELLE, ALABAMA

As an AmerEco subcontractor, CWM-Emelle has received and landfilled numerous PCB solids (mostly drained and flushed transformer carcasses) from DOD installations. AmerEco processes PCB items and remanifests full loads to

CWM-Emelle. Both DOD and non-DOD PCB items are manifested, but most PCB items were from the DRMS contracts. CWM-Emelle receives PCB items at their PCB processing unit after the truck is weighed. The manifest is checked and appropriate measurements/records made. An example of CWM-Emelle records is in Appendix C. The PCB items are transferred to a CWM truck and usually landfilled the day received. CWM-Emelle issues a certificate of disposal upon request.

The facility is located on a 2,400-acre parcel of land in rural Alabama. The active fenced portion of the site is 400 acres and the landfill cells are dug about 100 feet into a 700- to 900-foot-deep chalk formation. PCB items and hazardous waste are landfilled in the same trench. PCB items are landfilled under approval of EPA Region IV. Each trench's approval from Region IV refers to the facility operating plan and the original 1978 approval. The facility also is subject to the terms of a 1984 consent agreement with EPA.

CWM-Emelle provided 72 "tracking" packages requested. Each package contained the manifest, receipt control form, transformer total sheet, waste transfer log, and waste mapping log. The results of comparing manifest weights and CWM-Emelle weights are presented in Table 2. An example of a CWM-Emelle "tracking" package is in Appendix C. The audit included records review, laboratory, PCB processing unit, receiving area and landfill inspection. The 1987 Annual Document was also reviewed. During this inspection, no noncompliance with TSCA regulations or DRMS contract requirements was noted.

DEPARTMENT OF DEFENSE. DEFENSE REUTILIZATION AND MARKETING  
SERVICE. ROBINS AIR FORCE BASE. WARNER ROBINS. GEORGIA

The DRMO Robins is responsible for PCBs/PCB items manifested from seven locations in Georgia. DRMO Robins has a new permitted (September 29, 1988) hazardous waste storage facility. The base has a new PCB storage building with approval from EPA Region IV. Both areas were inspected. Custody of PCBs/PCB items is transferred to DRMS on a Form 1348-1 Turn-in-Document. Information is taken from nameplates and the base environmental personnel sample any PCBs not indicated as over 500 ppm.



AmerEco made four pickups under contract DLA 200-87-D-0044 of DRMO Robins PCBs/PCB items.

Additionally, the retrograde PCBs/PCB items from DOD radar installations in Canada were picked up at Robins Air Force Base. On nine Tuesdays from June to September, the retrograde PCBs/PCB items were flown to Robins Air Force Base. The PCBs/PCB items were transferred directly to AmerEco trucks for shipment to Kingsville, Missouri with three exceptions. The first shipment arrived and only one of four trucks was loaded that day. The waste (most of it overpacked) sat on the flight line overnight. This happened on one other occasion and only overpacked waste sat overnight. The third occasion was the last shipment which was loaded onto another contractor's vehicles (Aptus). Aptus, Coffeyville, Kansas (formerly known as National Electric) is the current PCB contractor for DRMO Robins.

The AmerEco vehicles were driven to AmerEco's Kingsville facility and unloaded in the presence of a DRMS representative. In contrast to DOD domestic PCB shipments, each item was weighed and the delivery orders modified as necessary. All items had been sent for disposal, both from the regular contracts and from the added retrograde delivery orders at the time of the NEIC inspection. The EPA Region VII inspection revealed that DOD Canadian PCBs/PCB items had been in storage for disposal for more than 1 year.

DRMO Robins provided copies of all manifests to the EPA Region IV inspector who inspected the retrograde project. During the NEIC inspection, there were only a few items in either the PCB or RCRA storage buildings. The PCB items were all in drip pans marked and no noncompliance with TSCA regulations were noted.

Copies of TSCA forms for AmerEco, CWM-Emelle and DRMO Robins are presented in Appendix D.

Although noncompliance was not directly observed at DRMO Robins, AmerEco records for dates PCBs/PCB items were placed in storage at other DOD facilities indicate storage for disposal exceeding 1 year. Federal

regulation requires disposal within 1 year when PCBs/PCB items are taken out of service and placed in storage for disposal.

## APPENDICES

- A AMERECO'S DRMS CONTRACTS
- B MANIFESTS/DOCUMENTS LISTING VOLUME DISCREPANCIES
- C CWM-EMELLE TRACKING PACKAGE
- D TSCA DOCUMENTS FOR AMERECO, DRMO ROBINS, AND CWM-EMELLE

## APPENDIX A

### AMERECO'S DRMS CONTRACTS

## Appendix A

### AMERECO'S DRMS CONTRACTS

Contract No.	Date*	Estimate	Obligated
DLA 200-86-D-0012	14 Nov. 85	\$658,566	\$251,880
DLA-200-86-D-0024	15 Aug. 86	\$392,922	\$1,186,630
DLA-200-87-D-0044	20 Mar. 87	\$1,176,265	\$4,196,663**
DLA 200-87-D-0048	16 Apr. 87	\$999,031	\$1,448,031

\* *Normal contract periods are for 1 year from contract date.*

\*\* *Retrograde PCBs/PCB items from DOD installations in Canada were added onto this contract and it was extended through September 1988.*

## APPENDIX B

### MANIFESTS/DOCUMENTS LISTING VOLUME DISCREPANCIES

01/09/89

# INVENTORY REPORT DEFENSE REUTILIZATION AND MARKETING SERV

D.O. 136

File	Manifest	Account	Date	Date	PCB	Repack	Process	Disposal	Disposal	
			Rec'd	Whse	Site	Stored	Lbs.	Gals.	Cu. Ft.	Level
88-0505 F108A		GV-0044	880620	T001s	B-H	860801	3730	65		+10000
88-0505 F108A		GV-0044	880620	T002s	B-H	860801	3740	65		+10000
88-0505 F108A		GV-0044	880620	T003s	B-H	860801	3020	45		148
88-0505 F108A		GV-0044	880620	T004s	B-H	860801	2800	42		<500
88-0505 F108A		GV-0044	880620	D005s	B-H	860801	13330	0		<500
88-0505 F108A		GV-0044	880620	L006T	BT-X	860801	845	65		+10000
88-0505 F108A		GV-0044	880620	L007T	BT-X	860801	845	65		+10000
88-0505 F108A		GV-0044	880620	L008T	BT-D	860801	360	45		148
88-0505 F108A		GV-0044	880620	Z009T	BT-B	880629	845	65		>500
88-0505 F108A		GV-0044	880620	Z010T	BT-B	880629	845	65		>500
88-0505 F108A		GV-0044	880620	L011T	BT-E	860801	336	42		<500
88-0505 F108A		GV-0044	880620	CD		881109				

① Data Flushing (Processing) completed

A-7  
13

1031  
REQUEST NUMBER

# PCB ANALYSIS REQUEST & LABORATORY REPORT

**AmerEco Environmental Services, Inc.**  
Rt. #1, Box 159, Kingsville, MO 64061  
Phone: (816) 732-5591

**ACCOUNT NUMBER:****GENERATOR INFO:**

86-D-44

00-136

**DATE RECEIVED IN LAB:** 6-21-88

**DATE COMPLETION:** 6-23-88

[illegible]

**APPROVED BY  
LAB MANAGER:**

William T. Deane

DATE: 6-23-88

**SAMPLE CODE:** P = Wipe Test, ~~O~~ = Oil, W = Water, S = Idle



AMERECO QUANTITY VARIANCES IN SHIPMENTS TO ROLLINS,  
DEER PARK, TEXAS

This table was generated using AmerEco's weight estimation factors, as follows:

	PCB ppm.	lbs./gallon
1.	500	8
2.	500	10
3.	10000	13

Sample No.	Manifest No.	Qty Listed	ppm	Qty Recv'd	Gallon Conversion	% Var
R-1	00461819	4009 gal	3	45680 lbs	3514	12
R-2	00471096	40300 lbs	NA	41880 lbs	NA	1
R-3	00472231	4002 gal	3	46800 lbs	3600	10
R-4	00472302	4002 gal	3	44900 lbs	3454	14
R-5	00472217	4219 gal	3	47680 lbs	3668	17
R-6	00472331	5353 gal	2	39720 lbs	3972	36
R-7	00472306	3532 gal	3	33540 lbs	2580	27
R-8	00488353	4005 gal	3	47320 lbs	3640	9
R- 9	00318908	6001 gal	1	40940 lbs	5117	15
R-10	00318906	4000 gal	3	42740 lbs	3288	18
R-11	00355361	4000 gal	2	41180 lbs	4118	3
R-12	00354780	6230 gal	2	46100 lbs	4610	26
R-13	00485506	5871 gal	1	42860 lbs	5357	9
R-14	00488141	5936 gal	1	44520 lbs	5565	6

TEXAS WATER COMMISSION  
P.O. Box 13087, Capitol Station  
Austin, Texas 78711-3087



Please print or type. (Form designed for use on nine (12-pitch) typewriter.)

Form approved OMB No. 2050-0039, expires 9-30-88

R-1

JUN 16 1988

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No M O D 9 8 0 9 6 2 8 4 9		Manifest Document No F 1 0 8 5		2. Page 1 of 1		Information in the shaded areas is not required by Federal law	
3. Generator's Name and Mailing Address AmerEco Environmental Services, Inc. Rt. 1 Box 159, 2 1/2 mi. E. on 58 Hwy. Kingsville, MO 64061 4. Generator's Phone (816) 732-5591						A. State Manifest Document Number MO - No 00461819			
5. Transporter 1 Company Name Custom Environmental Transport.						6. US EPA ID Number D E D 9 8 0 9 1 8 8 5 8		C. State Transporter's ID 40756	
7. Transporter 2 Company Name						8. US EPA ID Number		D. Transporter's Phone 713-479-4801	
9. Designated Facility Name and Site Address Rollins Environmental Services, (TX), Inc. P.O. Box 609, 2027 Battleground Rd. Deer Park, TX 77536						10. US EPA ID Number T X D 0 5 5 1 4 1 3 7 8		E. State Transporter's ID	
								F. Transporter's Phone	
								G. State Facility's ID TX - 01429	
								H. Facility's Phone 713-479-6001	
11A. HM	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)					12. Containers No.	13. Total Quantity	14. Unit Wt/Vol	15. Waste No.
	a. RQ Waste Hazardous Substance, liquid, N.O.S., ORM-E, NA 9188 (Polychlorinated Biphenyls)					0 0 1	T T	0 4 0 0 9	G 116080
	b.								11 (D)
	c.								11 (E)
	d.								11 (F)
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above			
PCB Manifest - Clean up any leaks or spills. In case of an emergency call 816-732-5591 or 816-732-6563. U.S. Coast Guard 1-800-424-8802. Chemtrec 1-800-424-9300.						206			
15. Special Handling Instructions and Additional Information									
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, including applicable state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.									
Printed/Typed Name David Taylor					Signature David Taylor			Month Day Year 06/10/88	
17. Transporter 1 Acknowledgement of Receipt of Materials									
Printed/Typed Name Lawrence Smith					Signature Lawrence Smith			Month Day Year 06/10/88	
18. Transporter 2 Acknowledgement of Receipt of Materials									
Printed/Typed Name					Signature			Month Day Year	
19. Discrepancy Indication Space									
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.									
Printed/Typed Name DeForney					Signature DeForney			Month Day Year 6/11/88	

*Rollins Environmental Services (TX) Inc.*

P. O. Box 609 Deer Park, Texas 77536 (713) 479 6001

JUN 27 1988

R-1



**Rollins**

JUNE 23, 1988

AMERECO ENVIRONMENTAL SERVICES, INC.  
ROUTE #1, BOX 159  
KINGSVILLE, MO 64061

ATTN: Mr. Marv Randolph

Dear Ms. Randolph:

This is to certify the material referenced below was incinerated as of 06/21/88 at our Deer Park facility - Rollins Environmental Services (04) Inc., P. O. Box 609, Deer Park, Texas 77536 in accordance with 40 CFR 761 as it pertains to incineration of PCB solids, liquids, and capacitors.

TOTAL POUNDS	-45680
H. O. NUMBER	-26093-38
DATE RECEIVED	-06/10/88
RES (TX) INC. B/L NUMBER	-111328
RES (TX) INVOICE NUMBER	-161593
TWC MANIFEST NUMBER	-00461819/F108S

SINCERELY,  
RES (TX) INC.

*Velma K. Shaffer /ms*  
VELMA K. SHAFFER  
PCB RECORDS ADMINISTRATOR

cc: Paula Arndt

Please call 713-479-6001 ext. 212 if there are any questions concerning the information on this Certificate of Destruction.

## APPENDIX C

### CWM-EMELLE TRACKING PACKAGE

Basic to R. Stryker  
W. H. H.

ENVIRONMENTAL PROTECTION AGENCY  
OFFICE OF ENFORCEMENT  
NATIONAL ENFORCEMENT INVESTIGATIONS CENTER  
BUILDING 53, BOX 25227, DENVER FEDERAL CENTER  
DENVER, COLORADO 80225

DATE April 17, 1989

MEMORANDUM

SUBJECT: Transmittal of Final NEIC Report, "Environmental Audit, AmerEco Environmental Services, Inc., Defense Reutilization and Marketing Service", Contract Nos. DLA 200-87-D-0044 and 0048

FROM: Charles Aschwanden, Esq., Acting Chief Enforcement Specialist Office

TO: Regional Counsel, Regions IV and VII  
Air and Toxics Division Directors, Regions IV and VII

Attached are copies of the subject report for your use. This report details the findings of our audit of the handling of PCBs/PCB items generated by Department of Defense installations in the United States and Canada by AmerEco Environmental Services, Inc. (AmerEco).

As stated in the report, AmerEco was not in compliance with all TSCA requirements.

This investigation was conducted as part of NEIC's and Department of Defense, Defense Reutilization and Marketing Services' cooperative effort to monitor the performance of hazardous waste/toxic substance disposal contractors. Copies of this report have been sent to the DRMS Headquarters, Battle Creek, Michigan.

If you have any questions regarding this report, please contact John Ellison at (FTS) 776-5139.

Attachments

cc: Carroll G. Wills, Esq., Acting Director, NEIC (w/o att)  
Art Linton, Federal Facilities Coordinator, EPA Region IV (w/att)  
A.E. Conroy II, Director, OCM-OPTS (EN342) (w/att)

RECEIVED  
APR 19 1989  
ASSISTANT ATTORNEY GENERAL

APR 19 2 06 PM '89

EPA REGION IV  
APR 19 1989



6-5-87  
11:00AM

RECEIPT CONTROL FORM

96513

<p>6-5-87 3:30PM</p> <p>Date: <u>6/5/87</u> Time: <u>10:58am</u> Truck #: <u>63610</u> Trailer #: <u>D45104</u></p> <p>Manifest #'s: <u>293611</u></p> <p>Generator(s): <u>AmerEco</u></p> <p>Waste I.D. <u>TRANS</u> Transporter <u>AmerEco</u></p> <p>Sched. Date: <u>6-5-87</u> Type (Circle one) Drums <input type="checkbox"/> Dump <input type="checkbox"/> Tanker <input type="checkbox"/> Roll-off <input checked="" type="checkbox"/> Other: <u>Flatbed</u></p> <p># of Wastestreams: <u>1</u> Approval (Initials): <u>PH</u> Date: <u>6-5-87</u> Time: <u>11:00am</u></p>		<p>WEIGHT</p> <p>Gross <u>55120</u> lb</p> <p>Tare</p> <p>Net <u>24520</u> lb</p> <p><u>41,660</u></p>
BULK LOADS	SPECIAL INSTRUCTIONS	
<p>WPS #: _____</p> <p>Sampler: _____</p> <p>Technician: _____</p> <p>PCB Analy Req? <u>YES</u> <u>NO</u> (CIRCLE ONE)</p> <p>PCB Results: _____</p> <p>CN<sup>-</sup> Req? <u>YES</u> <u>NO</u> (CIRCLE ONE)</p> <p>CN<sup>-</sup> Results: _____</p> <p>S Req? <u>YES</u> <u>NO</u> (CIRCLE ONE)</p> <p>S Results: _____</p> <p>Disposal Method <u>D81 / T45 - D81</u> (CIRCLE ONE)</p> <p>Disposal Method (Other) _____</p> <p>Mix Ratio: _____ (FLUE DUST) (WASTE)</p> <p>Trench: _____</p> <p>Section: _____</p> <p>Density: _____ (TANKER ONLY)</p> <p>Wash Pad Release: _____</p>	<p><del>with drums</del></p> <p>piece OK -</p>	
<p>Released For Disposal By: _____ Signature</p>		



# HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type (Form designed for use on elite (12-pitch) typewriter)

Form Approved OMB No 2000-0404 Expires 7 31 86

UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No.	Manifest Document No.	2 Page 1 of 1	Information in the shaded areas is not required by Federal law	
3. Generator's Name and Mailing Address AmerEco Environmental Services, Inc. Rt 1, Box 159, Kingsville, MO 64061		M 0 0 D 9 8 0 9 6 2 8 4 9 E 1 0 3 7 7 S		A. State Manifest Document Number <b>CWMA-293511</b>		
4. Generator's Phone ( 816 ) 73205591		6 US EPA ID Number		B. State Generator's ID		
5. Transporter 1 Company Name AmerEco Environmental Services, Inc.		M 0 0 D 9 8 0 9 6 2 8 4 9		C. State Transporter's ID		
7. Transporter 2 Company Name		8 US EPA ID Number		D. Transporter's Phone 816-732-5591		
9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT, INC Emelle Facility Alabama Highway 17 at Mile Marker 163 Emelle, Alabama 35459		10 US EPA ID Number A L D 0 0 0 6 2 2 4 6 4		E. State Transporter's ID		
				F. Transporter's Phone		
				G. State Facility's ID		
				H. Facility's Phone <b>205/652-9721</b>		
11 US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12 Containers No.	Type	13 Total Quantity	14 Unit Wt/Vol	15 Waste No.
a. RQ Waste, Polychlorinated Biphenyls ORM-E UN 2315 CWM Profile Number D95950		0 2 0	cm	5 0 7 8 0	p	
b. CWM Profile Number						
c. CWM Profile Number						
d. CWM Profile Number						
J. Additional Descriptions for Materials Listed Above A. Transformers >500 PPM		K. Handling Codes for Wastes Listed Above a. D81				
15 Special Handling Instructions and Additional Information PCB Manifest - Clean up any leaks or spills; call emergency coordinator (816-732-5591/6563) in case of emergencies or questionable developments.						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations  Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment  Printed/Typed Name: David Taylor Signature: David Taylor Month Day Year: 10/6/87						
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name: Gene Crabtree Signature: Gene Crabtree Month Day Year: 10/6/87						
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name: Signature: Month Day Year:						
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name: Signature: Month Day Year: 09/05/87						

DRAINED & FLUSHED TRANSFORMERS  
PROCESSING FORM

Customer Information

Generator Name: AmerEco Services

Generator Location: Kingsville, Mo

Manifest # 293611

Total Transformers on Manifest: 20

Generator # Storage Date: 4-16-87

CRM Received Date: 6-5-87

Page 1 of 1

Transformer Identification Drained + Flushed Only.

Serial #	Manufacturer	Ht. Empty (lbs.)	Dimensions	FT <sup>3</sup>
253466	NA	3685	66, 70, 41	110
6322295		8930	82, 60, 36	103
7144854		250	20, 20, 36	8
B720582		560	30, 26, 48	22
7865648		420	21, 22, 42	11
2146786		240	22, 23, 31	9
F549959-65P		120	15, 16, 21	3
4229118-68P		120	16, 15, 21	3
6618912		300	23, 24, 33	11
H224867-68P		110	15, 15, 20	3
8011553		300	22, 22, 31	9
8003129		210	18, 18, 26	5
7872854		220	18, 18, 26	5
6618916		250	22, 23, 31	9

Transformer Carcass Disposal Record.

Total Cubic Feet. 753

Disposal Date: 6-5-87

Disposal Trench: 21-B

Operator: Lyman Well

Date: 6-5-87

Supervisor: ED Stegfreid

Date: 6-5-87



DRAINED & FLUSHED TRANSFORMERS  
PROCESSING FORM

Customer Information

Generator Name: Amer Eco Services  
 Generator Location: Kingsville, MD  
 Manifest #: 293611  
 Total Transformers on Manifest: 20  
 Generator # Storage Date: 4-16-87

CRM Received Date: 6-5-87  
 Page 1 of 1

Transformer Identification Drained + Flushed Only.

Serial #	Manufacturer	Ht. Empty (lbs.)	Dimensions	FT <sup>3</sup>
7865638	NA	440	20, 22, 42	11
PCV-3299-01		6103	80, 44, 31	63
29070		4682	42, 36, 73	64
6540681		8485	78, 62, 32	90
4081779		12,000	76, 82, 48	173
05678-12B9		3355	28, 60, 42	41

Transformer Carcass Disposal Record.

Total Cubic Feet: 753

Disposal Date: 6-5-87

Disposal Trench: 21-B

Operator: Norman Webb

Date: 6-5-87

Supervisor: ED Siegfried

Date: 6-5-87



# WASTE MAPPING LOG

 DATE 6/5/85

 BY [Signature]

GENERATOR	MANIFEST NUMBER	W P/S NUMBER	QUANTITY	TRENCH	LEVEL	GRID COORDINATES
0.56 W. Goodrich	336518	Cal. 7-07967	dump	21.0	11	m.n 6
at 1 Stand 52430	276488	AIA-A-33685	R/off			6
Unisys T-01	344321	TSS-G-12598	dump			L.m 7
CA 120-T	309378	HA-E-31563				m.n 5.6
137.2	329376					6
rodshaft 9867	335055	ms.A-69582				
Decant T4	87.156 (7)	WTL	60/55 8/85	11.0	11.A.B	L.m 3.4
T.3	87.156 (8)		80/47			
5064 pture water	338034	mar G-12925	R/off		11	H.I 4.5
Per. Barn 19-T	87.156 (9)	WTL	9/Trans			N 7
3036	87.156 (10)		3			
rodshaft 5326	335056	ms.A-69582	dump			m.n 6
Wire Temper R1	338316		R/off			6
2424.014 W. Goodrich	336510	Cal. 7-07967				5.6
Decant T.3	87.156 (11)	WTL	60/55 1/85		11.A.B	L.m 3.4
T.1	87.156 (12)		14/47 2/14 1/30 60/55 1/5			
Incidental Dia 6	345336	AIA-A-09257	R/off		11	m.n 5.6
3083 B. Barn	87.156 (13)	WTL	5/55 6/Trans			N 6.7
132	87.156 (14)		8/Trans			N 7
D45104 5064 A	87.156 (15)		20/Trans			
record, Inc.	278566	ASH-002977	R/off			m.n 5.6
Iron Alum 3097	347652	mar-E-17617	dump		10	D.E 7.8
3094	347653					
3091 513	347654					
Kansas Power PCN	327369	BUD-T-81538				

1 - Lump  
 PCB  
 MPA

1 — File Copy

2 — Permit Copy

3 — Receiving Copy

NUMBER: 871512

BY, [Signature]

[illegible]

## APPENDIX D

TSCA DOCUMENTS FOR AMERECO, DRMO ROBINS, AND CWM-EMELLE



US ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

NOTICE OF INSPECTION

Form Approved  
OMB No. 2070-0007  
Approval expires 8-31-85

1. INVESTIGATION IDENTIFICATION			2. TIME	3. FIRM NAME
DATE 9 Jan 89	INSPECTOR NO. 06772	DAILY SEQ. NO. 01	9:20AM	Amer-Eco Environmental Services
4. INSPECTOR ADDRESS EPA-NESC Bldg 53, Box 25227, DFC Denver, CO 80226			5. FIRM ADDRESS Rte 1 Box 159 Kingsville, MO 64061	

REASON FOR INSPECTION

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

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

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

☐ A. Financial data

☐ D. Personnel data

☐ B. Sales data

☐ E. Research data

☐ C. Pricing data

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

INSPECTOR SIGNATURE 		RECIPIENT SIGNATURE 	
NAME John T. Ellison		NAME Dennis Nix	
TITLE Env. Inv. Spec	DATE SIGNED 9 Jan 89	TITLE PRESIDENT	DATE SIGNED 1/9/89



US ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

TSCA INSPECTION CONFIDENTIALITY NOTICE

Form Approved  
OMB No. 3070-0007  
Approval expires 8-31-85

1. INVESTIGATION IDENTIFICATION			2. FIRM NAME
DATE 9 Jan 89	INSPECTOR NO. 06772	DAILY SEQ. NO. 01	Amer Eco Environmental Services, Inc.
3. INSPECTOR NAME John T. Ellison			4. FIRM ADDRESS Rte. 1, Box 159 Kingsville, Mo. 64061
5. INSPECTOR ADDRESS Bldg 53 Box 25227, DFC Denver, CO 80226			6. CHIEF EXECUTIVE OFFICER NAME Dennis Nix
			7. TITLE President

TO ASSERT A CONFIDENTIAL BUSINESS INFORMATION CLAIM

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 USC 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Toxic Substances Control Act (TSCA), Section 14. EPA is required to make inspection data available in response to FOIA requests unless the Administrator of the Agency determines that the data contain information entitled to confidential treatment or may be withheld from release under other exceptions of FOIA.

Any or all the information collected by EPA during the inspection may be claimed confidential if it relates to trade secrets or commercial or financial matters that you consider to be confidential business information. If you assert a CBI claim, EPA will disclose the information only to the extent, and by means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential business information. Among other things, the regulations require that EPA notify you in advance of publicly disclosing any information you have claimed as confidential business information.

A confidential business information (CBI) claim may be asserted at any time. You may assert a CBI claim prior to, during, or after the information is collected. The declaration form was developed by the Agency to assist you in asserting a CBI claim. If it is more convenient for you to assert a CBI claim on your own stationery or by marking the individual documents or samples "TSCA confidential business information," it is not necessary for you to use this form. The inspector will be glad to answer any questions you may have regarding the Agency's CBI procedures.

While you may claim any collected information or sample as confidential business information, such claims are unlikely to be upheld if they are challenged unless the information meets the following criteria:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.

2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time, you may make claims that some or all of the information is confidential business information.

If you are not authorized by your company to assert a CBI claim, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials to the Chief Executive Officer of your firm within 2 days of this date. The Chief Executive Officer must return a statement specifying any information which should receive confidential treatment.

The statement from the Chief Executive Officer should be addressed to:

Geraldine Hilden, TSCA DCO  
National Enforcement Investigations Center  
Bldg. 53, Box 25227, Denver Federal Center  
Denver, CO 80225

and mailed by registered, return-receipt requested mail within 7 calendar days of receipt of this Notice. Claims may be made any time after the inspection, but inspection data will not be entered into the special security system for TSCA confidential business information until an official confidentiality claim is made. The data will be handled under the agency's routine security system unless and until a claim is made.

TO BE COMPLETED BY FACILITY OFFICIAL RECEIVING THIS NOTICE:		If there is no one on the premises of the facility who is authorized to make business confidentiality claims for the firm, a copy of this Notice and other inspection materials will be sent to the company's chief executive officer. If there is another company official who should also receive this information, please designate below.
I have received and read the notice		
SIGNATURE 	NAME	
NAME Dennis Nix	TITLE	
TITLE PRESIDENT	DATE SIGNED 1/9/88	ADDRESS



US ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

Form Approved  
OMB No 2070-0007  
Approval expires 8-31 85

DECLARATION OF CONFIDENTIAL BUSINESS INFORMATION

1. INVESTIGATION IDENTIFICATION			2. FIRM NAME
DATE 10 Jan 89	INSPECTOR NO. 06772	DAILY SEQ. NO. 01	Amer-Eco Environmental Services, Inc.
3. INSPECTOR ADDRESS EPA-NEIC 13145. 53, Box 25227, DFC Denver, CO 80228			4. FIRM ADDRESS Rte 1, Box 159 Kingsville, MO 64061

INFORMATION DESIGNATED AS CONFIDENTIAL BUSINESS INFORMATION

NO.	DESCRIPTION
	None Declared as of 1/10/89

ACKNOWLEDGEMENT BY CLAIMANT

The undersigned acknowledges that the information described above is designated as Confidential Business Information under Section 14(c) of the Toxic Substances Control Act. The undersigned further acknowledges that he/she is authorized to make such claims for his/her firm.

The undersigned understands that challenges to confidentiality claims may be made, and that claims are not likely to be upheld unless the information meets the following guidelines: (1) The company has taken measures to protect the confidentiality of the information and it intends to continue to take such measures; (2) The information is not, and has not been reasonably attainable without the company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding); (3) The information is not publicly available elsewhere; and (4) Disclosure of the information would cause substantial harm to the company's competitive position.

INSPECTOR SIGNATURE 		CLAIMANT SIGNATURE 	
NAME John T. Ellison		NAME DENNIS NIX	
TITLE Env. Inv. Spec.	DATE SIGNED 10 Jan 89	TITLE PRESIDENT	DATE SIGNED 1/10/89





US ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

RECEIPT FOR SAMPLES AND DOCUMENTS

Form Approved  
OMB No. 2070-0007  
Approval expires 8-31-85

1. INVESTIGATION IDENTIFICATION			2. FIRM NAME
DATE 16 Jan 89	INSPECTOR NO. 06772	DAILY SEQ. NO. 01	AmerEco Environmental Services, Inc.
3. INSPECTOR ADDRESS EPA-NEIC Bldg. 53, Box 25227, DFC Denver, CO 80226			4. FIRM ADDRESS Rte 1, Box 159 Kingsville, MO 64061

The documents and samples of chemical substances and/or mixtures described below were collected in connection with the administration and enforcement of the Toxic Substances Control Act.

RECEIPT OF THE DOCUMENT(S) AND/OR SAMPLE(S) DESCRIBED IS HEREBY ACKNOWLEDGED:

NO.	DESCRIPTION
~150	Inventory Sheets (see list)
~15	PCB Analysis Request & Laboratory Report (see List)

OPTIONAL:

DUPLICATE OR SPLIT SAMPLES: REQUESTED AND PROVIDED ☐ NOT REQUESTED ☐

INSPECTOR SIGNATURE <i>John T. Ellison</i>		RECIPIENT SIGNATURE <i>Dennis Nix</i>	
NAME John T. Ellison		NAME Dennis Nix	
TITLE Env. Inv. Spec.	DATE SIGNED 10 Jan 89	TITLE PRESIDENT	DATE SIGNED 1/10/89



US ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

NOTICE OF INSPECTION

Form Approved  
OMB No. 2070-0007  
Approval expires 3-31-85

1 INVESTIGATION IDENTIFICATION			2. TIME	3 FIRM NAME
DATE 11 Jan 89	INSPECTOR NO. 06772	DAILY SEQ. NO. 01	0830	DRMO Robins
4 INSPECTOR ADDRESS EPA - NEIC Bldg. 53 Box 25227 DFC Denver, CO 80225				5. FIRM ADDRESS Robins Air Force Base Warner Robins, Georgia

REASON FOR INSPECTION

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

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

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

☐ A. Financial data

☐ D. Personnel data

☐ B. Sales data

☐ E. Research data

☐ C. Pricing data

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

INSPECTOR SIGNATURE <i>John T. Ellison</i>		RECIPIENT SIGNATURE <i>Donna B. McDowell</i>	
NAME John T. Ellison		NAME DONNA B. McDowell	
TITLE Env. Inv. Spec.	DATE SIGNED 11 Jan 89	TITLE Env. Protection Spec.	DATE SIGNED 11 Jan 89



## TOXIC SUBSTANCES CONTROL ACT

## TSCA INSPECTION CONFIDENTIALITY NOTICE

Form Approved  
OMB No. 3070-0007  
Approval expires 8-31-85

1. INVESTIGATION IDENTIFICATION			2. FIRM NAME	
DATE 11 Jan 89	INSPECTOR NO. 06772	DAILY SEQ. NO. 01	DRMO Robins	
3. INSPECTOR NAME John T. Ellison			4. FIRM ADDRESS Robins Air Force Base Warner Robins, Georgia	
5. INSPECTOR ADDRESS EPA-NEIC Bldg 53 Box 25227 DFC Denver, CO 80225			6. CHIEF EXECUTIVE OFFICER NAME Alice C. Rodgers	
			7. TITLE DRMO Chief	

## TO ASSERT A CONFIDENTIAL BUSINESS INFORMATION CLAIM

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 USC 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Toxic Substances Control Act (TSCA), Section 14. EPA is required to make inspection data available in response to FOIA requests unless the Administrator of the Agency determines that the data contain information entitled to confidential treatment or may be withheld from release under other exceptions of FOIA.

Any or all the information collected by EPA during the inspection may be claimed confidential if it relates to trade secrets or commercial or financial matters that you consider to be confidential business information. If you assert a CBI claim, EPA will disclose the information only to the extent, and by means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential business information. Among other things, the regulations require that EPA notify you in advance of publicly disclosing any information you have claimed as confidential business information.

A confidential business information (CBI) claim may be asserted at any time. You may assert a CBI claim prior to, during, or after the information is collected. The declaration form was developed by the Agency to assist you in asserting a CBI claim. If it is more convenient for you to assert a CBI claim on your own stationery or by marking the individual documents or samples "TSCA confidential business information," it is not necessary for you to use this form. The inspector will be glad to answer any questions you may have regarding the Agency's CBI procedures.

While you may claim any collected information or sample as confidential business information, such claims are unlikely to be upheld if they are challenged unless the information meets the following criteria:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.

2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time, you may make claims that some or all of the information is confidential business information.

If you are not authorized by your company to assert a CBI claim, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials to the Chief Executive Officer of your firm within 2 days of this date. The Chief Executive Officer must return a statement specifying any information which should receive confidential treatment.

The statement from the Chief Executive Officer should be addressed to:

Geraldine Hilden, TSCA DCO  
National Enforcement Investigations Center  
Bldg. 53, Box 25227, Denver Federal Center  
Denver, CO 80225

and mailed by registered, return-receipt requested mail within 7 calendar days of receipt of this Notice. Claims may be made any time after the inspection, but inspection data will not be entered into the special security system for TSCA confidential business information until an official confidentiality claim is made. The data will be handled under the agency's routine security system unless and until a claim is made.

## TO BE COMPLETED BY FACILITY OFFICIAL RECEIVING THIS NOTICE:

I have received and read the notice

## SIGNATURE

John T. Ellison

## NAME

John T. Ellison

## TITLE

Env. Inv. Spec.

## DATE SIGNED

11 Jan 89

If there is no one on the premises of the facility who is authorized to make business confidentiality claims for the firm, a copy of this Notice and other inspection materials will be sent to the company's chief executive officer. If there is another company official who should also receive this information, please designate below.

## NAME

Donna B. McDowell

## TITLE

Env. Protection Spec.

## ADDRESS

Bldg 1602  
Robins AFB Ga 31098



US ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

Form Approved  
OMB No. 2070-0007  
Approval expires 8-31-85

DECLARATION OF CONFIDENTIAL BUSINESS INFORMATION

1. INVESTIGATION IDENTIFICATION			2. FIRM NAME
DATE 11 Jan 88	INSPECTOR NO. 06772	DAILY SEQ. NO. 01	DRMO Robins
3. INSPECTOR ADDRESS EPA-NEIC Bldg 53, Box 25227, OFC Denver, CO 80225			4. FIRM ADDRESS <del>Warner</del> Robins AFB Warner Robins, Georgia

INFORMATION DESIGNATED AS CONFIDENTIAL BUSINESS INFORMATION

NO.	DESCRIPTION
	None Declared as of 11 Jan 88

ACKNOWLEDGEMENT BY CLAIMANT

The undersigned acknowledges that the information described above is designated as Confidential Business Information under Section 14(c) of the Toxic Substances Control Act. The undersigned further acknowledges that he/she is authorized to make such claims for his/her firm.

The undersigned understands that challenges to confidentiality claims may be made, and that claims are not likely to be upheld unless the information meets the following guidelines: (1) The company has taken measures to protect the confidentiality of the information and it intends to continue to take such measures; (2) The information is not, and has not been reasonably attainable without the company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding); (3) The information is not publicly available elsewhere; and (4) Disclosure of the information would cause substantial harm to the company's competitive position.

INSPECTOR SIGNATURE <i>John T. Ellison</i>		CLAIMANT SIGNATURE <i>Donna B. McDowell</i>	
NAME John T. Ellison		NAME DONNA B. McDowell	
TITLE Env. Inv. Spec.	DATE SIGNED 11 Jan 88	TITLE Env. Protection Spec	DATE SIGNED 11 Jan 89



US ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT  
RECEIPT FOR SAMPLES AND DOCUMENTS

Form Approved  
OMB No. 2070-0007  
Approval expires 8-31-85

1. INVESTIGATION IDENTIFICATION			2. FIRM NAME
DATE 11 Jan 88	INSPECTOR NO. 06772	DAILY SEQ. NO. 01	DRMO Robins
3. INSPECTOR ADDRESS EPA - NEIC Bldg. 53, Box 25227, DFC Denver, CO 80225			4. FIRM ADDRESS Robins AFB Warner Robins, Georgia

The documents and samples of chemical substances and/or mixtures described below were collected in connection with the administration and enforcement of the Toxic Substances Control Act.

RECEIPT OF THE DOCUMENT(S) AND/OR SAMPLE(S) DESCRIBED IS HEREBY ACKNOWLEDGED:

NO.	DESCRIPTION
1	manifest from CAOM Pinetree last shipment 00357/062FM picked up 9/13/88 delivered 10/3/88

OPTIONAL:

DUPLICATE OR SPLIT SAMPLES: REQUESTED AND PROVIDED ☐ NOT REQUESTED ☐

INSPECTOR SIGNATURE <i>John T. Ellison</i>		RECIPIENT SIGNATURE <i>Donna B. McDowell</i>	
NAME John T. Ellison		NAME DONNA B. McDowell	
TITLE Env. Inv. Spec.	DATE SIGNED 11 Jan 89	TITLE Env. Protection Spec.	DATE SIGNED 11 Jan 89



US ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

NOTICE OF INSPECTION

Form Approved  
OMB No. 2070-0007  
Expires 3-31-88

1. INVESTIGATION IDENTIFICATION			2. TIME	3. FIRM NAME
DATE 12 Jan 89	INSPECTOR NO. 06772	DAILY SEQ. NO. 01	0830	Chemical Waste Management, Inc
4. INSPECTOR ADDRESS EPA - NEIC Bldg. 53, Box 25227, OFC Denver, CO 80225				5. FIRM ADDRESS Hwy 17 mile marker 163 Emelle, AL

REASON FOR INSPECTION

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

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

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

☐ A. Financial data

☐ D. Personnel data

☐ B. Sales data

☐ E. Research data

☐ C. Pricing data

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

A42-16

INSPECTOR SIGNATURE <i>John T. Ellison</i>		RECIPIENT SIGNATURE <i>Rodger Henson</i>	
NAME John T. Ellison		NAME Rodger Henson	
TITLE Env. Inv. Spec.	DATE SIGNED 12 Jan 89	TITLE General Manager	DATE SIGNED 1/12/89



US ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

TSCA INSPECTION CONFIDENTIALITY NOTICE

Form Approved  
OMB No. 2070-0007  
Expires 3-31-88

1. INVESTIGATION IDENTIFICATION			2. FIRM NAME
DATE 12 Jan 89	INSPECTOR NO. 06772	DAILY SEQ. NO. 01	Chemical Waste Management, Inc
3. INSPECTOR NAME John T. Ellison			4. FIRM ADDRESS Hwy 17 Mile Marker 163 Emelle, AL
5. INSPECTOR ADDRESS EPA - NEIC Bldg. 53, Box 25227, DFC Denver, CO 80225			6. CHIEF EXECUTIVE OFFICER NAME Rodger Henson
			7. TITLE General Manager

TO ASSERT A CONFIDENTIAL BUSINESS INFORMATION CLAIM

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 USC 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Toxic Substances Control Act (TSCA), Section 14. EPA is required to make inspection data available in response to FOIA requests unless the Administrator of the Agency determines that the data contain information entitled to confidential treatment or may be withheld from release under other exceptions of FOIA.

Any or all the information collected by EPA during the inspection may be claimed confidential if it relates to trade secrets or commercial or financial matters that you consider to be confidential business information. If you assert a CBI claim, EPA will disclose the information only to the extent, and by means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential business information. Among other things, the regulations require that EPA notify you in advance of publicly disclosing any information you have claimed as confidential business information.

A confidential business information (CBI) claim may be asserted at any time. You may assert a CBI claim prior to, during, or after the information is collected. The declaration form was developed by the Agency to assist you in asserting a CBI claim. If it is more convenient for you to assert a CBI claim on your own stationery or by marking the individual documents or samples "TSCA confidential business information," it is not necessary for you to use this form. The inspector will be glad to answer any questions you may have regarding the Agency's CBI procedures.

While you may claim any collected information or sample as confidential business information, such claims are unlikely to be upheld if they are challenged unless the information meets the following criteria:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.

2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time, you may make claims that some or all of the information is confidential business information.

If you are not authorized by your company to assert a CBI claim, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials to the Chief Executive Officer of your firm within 2 days of this date. The Chief Executive Officer must return a statement specifying any information which should receive confidential treatment.

The statement from the Chief Executive Officer should be addressed to:

and mailed by registered, return-receipt requested mail within 7 calendar days of receipt of this Notice. Claims may be made any time after the inspection, but inspection data will not be entered into the special security system for TSCA confidential business information until an official confidentiality claim is made. The data will be handled under the agency's routine security system unless and until a claim is made.

A42-16

TO BE COMPLETED BY FACILITY OFFICIAL RECEIVING THIS NOTICE:		If there is no one on the premises of the facility who is authorized to make business confidentiality claims for the firm, a copy of this Notice and other inspection materials will be sent to the company's chief executive officer. If there is another company official who should also receive this information, please designate below.
I have received and read the notice		
SIGNATURE 	NAME John T. Ellison	NAME 
TITLE Env. Inv. Spec.	DATE SIGNED 12 Jan 89	TITLE General Manager
		ADDRESS P.O. Box 55 Emelle AL 35459

A42-16


 US ENVIRONMENTAL PROTECTION AGENCY  
 WASHINGTON, DC 20460

## TOXIC SUBSTANCES CONTROL ACT

 Form Approved  
 OMB No. 2070-0007  
 Expires 3 31 88

## DECLARATION OF CONFIDENTIAL BUSINESS INFORMATION

1. INVESTIGATION IDENTIFICATION			2. FIRM NAME
DATE 12 Jan 89	INSPECTOR NO. 06772	DAILY SEQ. NO. 01	Chemical Waste Management, Inc.
3. INSPECTOR ADDRESS			4. FIRM ADDRESS
EPA-NEIC Bldg 53, Box 25227, OFC Denver, CO 80225			Hwy 17 Mile Marker 163 Emelle, AL

## INFORMATION DESIGNATED AS CONFIDENTIAL BUSINESS INFORMATION

NO.	DESCRIPTION
	None Declared as of 12 Jan 89

## ACKNOWLEDGEMENT BY CLAIMANT

The undersigned acknowledges that the information described above is designated as Confidential Business Information under Section 14(c) of the Toxic Substances Control Act. The undersigned further acknowledges that he/she is authorized to make such claims for his/her firm.

The undersigned understands that challenges to confidentiality claims may be made, and that claims are not likely to be upheld unless the information meets the following guidelines: (1) The company has taken measures to protect the confidentiality of the information and it intends to continue to take such measures; (2) The information is not, and has not been reasonably attainable without the company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding); (3) The information is not publicly available elsewhere; and (4) Disclosure of the information would cause substantial harm to the company's competitive position.

INSPECTOR SIGNATURE		CLAIMANT SIGNATURE	
<i>John T. Ellison</i>		<i>Rodger Henson</i>	
NAME		NAME	
John T. Ellison		Rodger Henson General Manager	
TITLE	DATE SIGNED	TITLE	DATE SIGNED
Env. Inv. Spec.	12 Jan 89	Gen. Mgr.	1/12/89





US ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT  
RECEIPT FOR SAMPLES AND DOCUMENTS

Form Approved  
OMB No 2070-0007  
Approval expires 3-31-88

1. INVESTIGATION IDENTIFICATION			2. FIRM NAME
DATE 12 Jan 89	INSPECTOR NO. 06772	DAILY SEQ. NO. 01	Chemical Waste Management, Inc.
3. INSPECTOR ADDRESS EPA - NEIC Bldg. 53, Box 25227, DFC Denver, CO 80225			4. FIRM ADDRESS Hwy 17, mile Marker 163 Emelle, AL

The documents and samples of chemical substances and/or mixtures described below were collected in connection with the administration and enforcement of the Toxic Substances Control Act.

RECEIPT OF THE DOCUMENT(S) AND/OR SAMPLE(S) DESCRIBED IS HEREBY ACKNOWLEDGED:

NO.	DESCRIPTION
72	PCB Tracking Records (See telefaxed list + supplemental list)

OPTIONAL:

DUPLICATE OR SPLIT SAMPLES: REQUESTED AND PROVIDED ☒ NOT REQUESTED ☐

A42-16

INSPECTOR SIGNATURE <i>John T. Ellison</i>		RECIPIENT SIGNATURE <i>Rodger Henson</i>	
NAME John T. Ellison		NAME Rodger Henson General Manager	
TITLE Env. Inv. Spec	DATE SIGNED 12 Jan 89	TITLE Gen. Mgr.	DATE SIGNED 1/12/89