PHASE 2 TRANSPORTATION AND DISPOSAL PLAN FOR 2013

Appendix C

to

Remedial Action Work Plan for Phase 2 Dredging and Facility Operations in 2013

HUDSON RIVER PCBs SUPERFUND SITE

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ACRONYMS AND ABBREVIATIONS

ARARs	Applicable or relevant and appropriate requirements
CD	Consent Decree
CFR	Code of Federal Regulations
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (Superfund)
CM	Construction Manager
CMSA	Coarse Material Staging Area
CPR	Delaware & Hudson Railway Company d/b/a Canadian Pacific Railway
CU	Certification Unit
cy	cubic yards
DoC	Depth of Contamination
DOT	U. S. Department of Transportation
DQAP	Dredging Construction Quality Control/Quality Assurance Plan
EDI	Electronic Data Interchange
EPA	United States Environmental Protection Agency
EZ	Exclusion Zone
Facility O&M Plan	Facility Operations and Maintenance Plan
FCSE	Filter Cake Staging Enclosures
GE	General Electric Company
HASP	Health and Safety Plan
NYCRR	New York Codes, Rules and Regulations
NYSDEC	New York State Department of Environmental Conservation
PCB	polychlorinated biphenyls
PFOC	Processing Facility Operations Contractor
POL	petroleum, oils, and lubricants
PPE	personal protective equipment
ppm	parts per million
QEA	Quantitative Environmental Analysis, LLC (now Anchor QEA, LLC)
OSHA	Occupational Safety and Health Administration
R&D	receiving/departure
RA	Remedial Action

ACRONYMS AND ABBREVIATIONS (CONTINUED)

RA HASP	Remedial Action Health and Safety Plan
RAWP	Remedial Action Work Plan
RCRA	Resource Conservation and Recovery Act
ROD	Record of Decision
RYOC	Rail Yard Operations Contractor
SEDC	Supplemental Engineering Data Collection
SOW	Statement of Work
SPCC	spill prevention control and countermeasures
SSAP	Sediment Sampling and Analysis Program
SWPPP	Storm Water Pollution Prevention Plan
TCLP	Toxicity Characteristic Leaching Procedure
TDP	Transportation and Disposal Plan
TSCA	Toxic Substances Control Act
UHW Manifest	Uniform Hazardous Waste Manifest, EPA Form 8700-22

SECTION 1

INTRODUCTION

In 2005, the General Electric Company (GE) and the United States Environmental Protection Agency (EPA) executed a Consent Decree (CD) relating to the performance of the Remedial Action (RA) selected by EPA to address polychlorinated biphenyls (PCBs) in sediments of the Upper Hudson River, located in New York State, through dredging, as described in EPA's February 2002 Record of Decision (ROD) for the Hudson River PCBs Superfund Site (EPA, 2002). The CD was filed in federal district court on October 6, 2005 (EPA/GE, 2005) and was approved and entered by the court as a final judgment on November 2, 2006, when it went into effect.

In accordance with the ROD and the CD, the RA was to be conducted in two phases. Phase 1 was defined as the first year of dredging and was conducted by GE in 2009. Phase 2 consists of the remainder of the dredging project. The CD provided an option to GE, following EPA's decision regarding the Performance Standards and scope of Phase 2, as to whether to elect to perform Phase 2 under the CD. In December 2010, EPA issued its decision regarding the Performance Standards and scope of Phase 2, and GE elected to perform Phase 2 under the CD.

The CD includes, as Appendix B, a Statement of Work (SOW) for Remedial Action and Operations, Maintenance and Monitoring, which sets forth a number of general requirements for the RA and includes several attachments specifying requirements for various aspects of the RA. EPA issued revised versions of the SOW and its attachments for Phase 2 in December 2010. For the work to be performed in each construction year of Phase 2, Section 3.1 of the revised SOW requires GE to submit a Remedial Action Work Plan (RAWP) for Phase 2 Dredging and Facility Operations for such year; and it specifies a number of specific plans to be included in that RAWP, including a Phase 2 Transportation and Disposal Plan.

In the spring of 2011 and 2012, GE submitted the RAWPs and other required work plans for, respectively, the first year of Phase 2 of the RA (known as Phase 2 Year 1) and the second year of Phase 2 of the RA (known as Phase 2 Year 2). GE conducted Phase 2 Year 1 dredging and associated activities in 2011 and Phase 2 Year 2 dredging and associated activities in 2012.

This *Phase 2 Transportation and Disposal Plan for 2013* (2013 TDP) has been developed, in accordance with the revised SOW, to apply to the third year of Phase 2 of the RA, to be conducted in 2013. This 2013 TDP is an appendix to and part of the *Remedial Action Work Plan for Phase 2 Dredging and Facility Operations in 2013* (2013 RAWP; Parsons, 2013a). The 2013 TDP describes the procedures to be followed in characterizing and handling the sediments and debris to be removed from the Upper Hudson River in 2013 for purposes of transport and disposal, and in transporting those materials, following dewatering, from the selected processing facility to the selected final disposal facilities.

EPA previously selected the Energy Park/Longe/New York State Canal Corporation site in Fort Edward, NY, as the location of the land-based sediment processing facility (referred to as the "processing facility site"). GE constructed the processing facility on that site prior to the start of Phase 1 dredging. The site is located along the shore of the Champlain Canal land cut between Locks 7 and 8. The site address is 446 Lock 8 Way, Hudson Falls, New York 12839. The dewatered sediments and debris will be transported from the processing facility site, via a combination of rail carriers, to the disposal sites selected by GE.

This 2013 TDP addresses matters relating to the transport and disposal of the dewatered sediments beginning at the processing facility site and ending at the disposal facilities. Specifically, it describes (a) the characterization and management of the sediments and debris subject to removal for purposes of transport and disposal; and (b) GE's responsibilities related to the transfer of dewatered sediments and debris from the processing facility site under the care and custody of the rail carriers to the selected disposal facilities for final disposal. This 2013 TDP is based on the 2012 TDP submitted by GE in October 2012 as Addendum #8 to the 2012 RAWP, approved by EPA on November 14, 2012, with appropriate updates for the 2013 season.

The on-site activities described herein at the processing facility site include the management of the excavated materials for purposes of transport and disposal, the loading of such materials by the Processing Facility Operations Contractor (PFOC) under Contract 30, and preparation of rail cars for loading and transport by the Rail Yard Operations Contractor (RYOC) under Contract 60. The other on-site activities at the processing facility will be conducted primarily by the PFOC under Contract 30, and are described in detail in the *Phase 2 Facility Operations and Maintenance Plan for 2013* (2013 Facility O&M Plan; Parsons, 2013b), which is Appendix B to the 2013 RAWP.

1.1 PLAN ORGANIZATION

This 2013 TDP is organized into nine sections, as follows:

Section 1 – Introduction: provides an introduction and the plan's organization, purpose, and applicable regulatory framework.

Section 2 – Characterization and Management of Waste/Material To Be Transported: describes the categories of the dredged sediments and debris and the characterization, segregation, management, and confirmation testing of such materials for purposes of transport and disposal.

Section 3 – Waste Destinations: describes the commercial disposal facilities authorized by EPA to receive the dewatered sediments and debris containing PCBs from the project.

Section 4 – Transportation: describes the means of transport of the dewatered sediments and debris from the processing facility site to the authorized disposal facilities.

Section 5 – On-Site Traffic Control and Loading Procedures: describes the on-site transport and loading of dewatered sediments and debris at the processing facility site.

Section 6 – Recordkeeping: presents the approach for recordkeeping and tracking of waste transport and disposal activities.

Section 7 – Health and Safety: provides an overview of the health and safety plans applicable to the transportation and disposal process.

Section 8 – Contingency Plans for Spills that Occur in Work Area: describes contingency plans for spills that may occur in the processing facility area during on-site handling and loading activities related to the transport.

Section 9 – References: lists references for documents cited in this plan.

Table 1-1 provides a cross-reference of the revised SOW requirements to the portions of this 2013 TDP where those requirements are addressed.

Table 1-1 Consent Decree SOW / 2013 TDP Cross-Reference Table

Description of Requirement	Citation	TDP Section
Characteristics of waste/water/ material to be transported.	SOW Section 3.1.1 (page 3-17), cross-referencing Section 2.3.2.2.4 of the SOW	Section 2
Destinations	Same as above	Section 3
Transportation modes	Same as above	Section 4
Routes	Same as above	Section 4
On-site traffic control and loading procedures	Same as above	Section 5
Recordkeeping	Same as above	Section 6
Health and Safety	Same as above	Section 7
Contingency plans for spills that occur in the Work Area	Same as above	Section 8

This 2013 TDP will apply to the characterization, handling, transport, and disposal of sediments dredged during the 2013 season. It will be revised and updated as appropriate for subsequent years of Phase 2.

1.2 REGULATORY FRAMEWORK

As the RA is being performed in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the activities described herein that will be conducted at the Hudson River PCBs Superfund Site (including the processing facility site) are exempt from federal, state, and local permitting requirements, and will be conducted in accordance with the substantive provisions of the pertinent federal and state laws and regulations

that have been identified as applicable or relevant and appropriate requirements (ARARs). Once the materials have left the site, the transport and disposal activities will be subject to applicable federal, state, and local laws and regulations, compliance with which will be the responsibility of the rail carriers (during transport) and the disposal facility operator (for disposal).

The laws and regulations pertinent to transportation and disposal activities include:

- The federal Toxic Substances Control Act (TSCA) and EPA's implementing regulations (40 Code of Federal Regulations [CFR] Part 761), which generally govern materials with PCB concentrations at or above 50 parts per million (ppm);
- The federal Resource Conservation and Recovery Act (RCRA) and EPA's implementing regulations (40 CFR Parts 260-270), which regulate material that constitutes "hazardous waste";
- The U.S. Department of Transportation (DOT) regulations relating to the transportation by railroad of hazardous materials (49 CFR Parts 171-174);
- The New York State Department of Environmental Conservation (NYSDEC) regulations governing the transport of regulated waste (6 New York Codes, Rules and Regulations [NYCRR] Part 364) and the management of hazardous waste (6 NYCRR Parts 370-372); and
- The applicable regulations of host states of authorized commercial disposal facilities selected by GE to manage dewatered Hudson River material from the Phase 2 dredging project in 2013 (further described in Section 3).

The materials dredged during Phase 1 in 2009 (shipped off-site in 2009 and 2010) and the materials dredged during Phase 2 Year 1 in 2011 were all transported to facilities authorized to receive TSCA-regulated waste, irrespective of PCB concentrations. During the 2011 dredging season, GE conducted a pilot study to evaluate the PCB concentrations of dewatered sediments and the practicality of managing TSCA-regulated and non-TSCA sediments separately. The pilot study demonstrated the practicality of handling these sediments separately (see Anchor QEA, 2012). Therefore, in 2012, GE proposed and EPA approved an approach involving the separate dredging, handling, transport, and disposal of (a) materials to be disposed of at TSCA-authorized facilities (referred to herein as TSCA materials) and (b) materials that contain PCBs less than 50 ppm and are appropriate for disposal at a non-TSCA solid waste landfill (referred to herein as non-TSCA materials). EPA's regulations specifically authorize the disposal of dewatered bulk PCB remediation waste containing PCBs at concentrations less than 50 ppm at a permitted municipal solid waste landfill or non-municipal non-hazardous industrial waste facility subject to the regulations under Subtitle D of RCRA (see 40 CFR §§ 761.61(a)(5)(i)(B)(*2*)(*ii*) & (a)(5)(v)(A)). GE embodied this approach in the 2012 TDP and utilized it throughout most of the 2012 dredging season.

For the 2013 dredging season, GE will continue to segregate dredged materials into TSCA materials and non-TSCA materials. The methodology for characterizing dredged materials as TSCA or non-TSCA materials is described in Section 2.2. As also described below, these materials will be handled separately throughout the sediment processing facility and will be transported off-site to separate disposal facilities, with the TSCA materials being sent to a TSCA-authorized facility and the non-TSCA materials being sent to a non-TSCA landfill.

Testing of the Upper Hudson River sediments using the Toxicity Characteristic Leaching Procedure (TCLP) indicates that the sediments to be dredged would not exhibit the characteristics of hazardous waste under RCRA (QEA, 2004). Accordingly, it is not anticipated that the RCRA regulations would apply. It should be noted, however, that under NYSDEC's hazardous waste regulations, materials containing PCBs at concentrations of 50 ppm or greater are considered state hazardous waste (6 NYCRR § 371.4(e)). Thus, the dredged sediments that are determined or assumed to contain PCBs at concentrations of 50 ppm or greater will be considered to constitute such hazardous waste under the NYSDEC regulations (based on their assumed PCB concentration, but not on any other basis), and will be transported to TSCA-authorized disposal facilities.

SECTION 2

CHARACTERIZATION AND MANAGEMENT OF WASTE/MATERIAL TO BE TRANSPORTED

This section describes the categories of the dredged sediments and debris that will be transported for disposal, and the procedures for characterization, segregation, management, and confirmation testing of such materials for purposes of transport and disposal.

2.1 WASTE STREAM CATEGORIES AND CHARACTERISTICS

The dredged material subject to off-site transport after dewatering will generally be composed of the following five categories:

- Debris – dredged material that is either too large to pass through the grizzly screen at the head end of the size separation equipment, as described in Sections 2.3.1 and 2.3.2 of the 2013 Facility O&M Plan. This oversized debris will be managed and disposed of as TSCA material. This category also includes incidental non-hazardous wastes from the project that are assumed to be contaminated with PCB-containing sediment, such as used personal protective equipment (PPE), used silt curtains, metal materials, and waste packaging and handling materials. Oversized debris is generally reduced in size at the debris staging area as necessary to facilitate handling and to meet disposal facility requirements.
- Coarse TSCA material – generally sand and gravel material, as well as small debris-type litter,[1] that comes from sediments characterized *in situ* (as described in Section 2.2) as containing PCBs at concentrations of 50 ppm or greater or is shown by post-processing sampling (as described in Section 2.3.3) to have PCB concentrations of 50 ppm or greater. This material will be managed and disposed of as TSCA material.
- Coarse non-TSCA material – generally sand and gravel material, as well as small debris-type litter, that comes from sediments characterized *in situ* (as described in Section 2.2) as containing PCBs at concentrations less than 50 ppm and is confirmed by post-processing sampling (as described in Section 2.3.3) to have PCB concentrations less than 50 ppm. This material will be managed and disposed of as non-TSCA material.
- Fine TSCA material – fine material (silts and clays)/filter cake that is generated from sediments characterized *in situ* (as described in Section 2.2) as containing PCBs at concentrations of 50 ppm or greater or is shown by post-processing sampling (as

[1] Although coarse material may contain some such small debris, the term "debris," as used in this TDP, generally refers to the oversized material described above.

described in Section 2.3.3) to have PCB concentrations of 50 ppm or greater. This material will be managed and disposed of as TSCA material.

- Fine non-TSCA material – fine material (silts and clays)/filter cake that is generated from sediments characterized *in situ* (as described in Section 2.2) as containing PCBs at concentrations less than 50 ppm and is confirmed by post-processing sampling (as described in Section 2.3.3) to have PCB concentrations less than 50 ppm. This material will be managed and disposed of as non-TSCA material.

The processing of the sediment is limited to physical/chemical dewatering. Thus, the characteristics of the dewatered sediment conforms to the characteristics of dredged sediment, except for the reduction in water content. Generally, coarse material will exhibit lower PCB concentrations than filter cake material. A broad range of physical characteristics has been encountered to date and will continue to be encountered in 2013, including organics and silts in backwater areas, medium to fine sands in much of the river, and gravel, cobbles, and wood debris in some areas of the river. These different sediment types become blended during unloading and material processing. In addition, polymers are used to promote settlement of the fine-grained materials.

2.2 WASTE CHARACTERIZATION

This section describes the approach that GE will follow in 2013 to characterize the dredged sediments and other waste material for transport and disposal. For the waste staged prior to disposal at the processing facility, GE (as the waste generator) or its representatives will identify the waste material's characteristics for transport and disposal, label and mark the material for transport, and report the shipments, as required, to EPA and NYSDEC.

For the 2013 dredging season, the sediments to be dredged will be characterized *in situ* as TSCA or non-TSCA materials based on sediment core data within the dredge areas. Specifically, the areas subject to dredging will be delineated *in situ* as TSCA and non-TSCA areas using sediment core data from the Sediment Sampling and Analysis Program (SSAP) and the Supplemental Engineering Data Collection (SEDC) program for the design dredge pass and using residual core data for subsequent dredge passes.

The delineation of dredge areas as TSCA or non-TSCA areas will be made using an approach initially proposed by GE in a February 2012 *Work Plan for In-Situ Sediment Characterization for Disposal* (Anchor QEA, 2012) and approved by EPA in a letter dated May 10, 2012, and subsequently incorporated into the EPA-approved 2012 TDP. Under this approach, using the available sediment core data, an average Total PCB concentration will be calculated for each core, based on averaging the PCB concentration data from the core down to the depth of contamination (DoC). Cores will then be assigned an area of influence (and acreage) using Thiessen polygons (an approach under which each Thiessen polygon contains only one core and any location within the polygon is closer to that core than to any other core).

Each Thiessen polygon will be assigned a volume based on the average depth of the dredge (or re-dredge) prism within the polygon, and will then be assigned the average PCB concentration from its associated core. Maps of the Thiessen polygons within the CUs will then be reviewed, and the polygons or portions of polygons are aggregated consistent with planned dredge lanes to create areas that are either above or below 50 ppm. These areas, conforming to dredge lanes, account for the resolution at which dredging operations can be efficiently managed. Although each aggregated non-TSCA area will have an average PCB concentration below 50 ppm, the area may contain polygons or portions of polygons associated with individual cores that have average PCB concentrations above 50 ppm. Materials dredged from such areas that were assigned a PCB concentration below 50 ppm will be considered non-TSCA materials, and those from areas that were assigned a PCB concentration at or above 50 ppm will be considered TSCA materials.

Under this *in situ* characterization approach, TSCA and non-TSCA materials will be segregated throughout the process of dredging, barge transport, and barge unloading, as well as handling, transfer, and staging of the materials at the processing facility, as discussed in Section 2.3. Confirmation sampling will then be performed (as described in Section 2.3.3) on the coarse materials and filter cake designated as non-TSCA to ensure that those materials have PCB concentrations less than 50 ppm and thus can be disposed of at a non-TSCA facility. TSCA and non-TSCA materials will then be separately transported to the respective disposal facilities authorized to receive and dispose of such materials, as also discussed below.

In addition, to preclude the possibility of disposing of sediment containing free liquid, the dewatered sediment will be monitored by the PFOC prior to transport to confirm that the material passes the Paint Filter Liquids Test, per EPA Method 9095 of "Test Methods for Evaluating Solid Waste" – Publication SW-846. Although solids content varies among dewatered sediment categories, all five categories of waste will be monitored via observation and/or testing by the PFOC to assure absence of free liquid before transfer to the staging area. Additional information on monitoring and testing for free liquid content is provided in Section 2.3.2. Occasionally, the coarse material may need to be stabilized with lime at the processing facility in order to load and transport the material or to pass the paint filter test. The mass of lime used and the coarse material staging area pile into which the stabilized material is placed will be recorded. If waste is observed to contain free liquids due to separation of liquid during shipping, the receiving waste disposal facility will remix or stabilize the material to remove free-liquid content.

Information for waste profiles for dewatered sediment material is presented for information purposes in Attachment A for TSCA material and Attachment B for non-TSCA material. Waste profiles will be prepared in the form required by the selected disposal facility, maintained by the Construction Manager (CM), and revised as necessary.

2.3 DEWATERED MATERIAL MANAGEMENT AND TESTING

Dredged TSCA and non-TSCA sediments (as determined based on the above *in situ* characterization approach) will be loaded into and transported in separate barges, and will be off-loaded and moved to separate areas at the processing facility size separation area. Non-TSCA material will be tracked by the CM from the non-TSCA dredge area, during barge transport, and to the pertinent size separation area. At the processing facility, non-TSCA sediments will be segregated from TSCA sediments during barge unloading and size separation. The resulting coarse non-TSCA material from the size separation process will remain segregated from the coarse TSCA material during on-site truck transport to the staging areas and by staging in separate designated coarse material staging areas (CMSAs). The CMSAs are shown on Figure 2-1. Similarly, filter cake (fine material) generated from sediments as determined based on the above *in-situ* characterization approach to contain PCB concentrations less than 50 ppm (non-TSCA sediments) will be segregated and handled separately from filter cake derived from sediments with ≥ 50 ppm PCBs (TSCA sediments), and will be staged separately in the Filter Cake Staging Enclosures (FCSEs), as described further below. The separate areas in the CMSAs and FCSEs will be designated either for TSCA or for non-TSCA material at all times. Transition of CMSAs and FCSEs from TSCA status to non-TSCA status is discussed in Section 2.3.1 below. As previously noted, oversize debris (i.e., material too large to go through the size separation equipment) emerging from the process will be considered as TSCA-regulated material for purposes of transport and disposal.

The CM will also track and record all segregation, handling, and staging of non-TSCA materials at the processing facility. The material from dredge areas which have been delineated (*in situ*) as containing PCB concentrations less than 50 ppm (non-TSCA areas) will be unloaded at an unloading wharf and handled at a size separation area designated for non-TSCA material. Since the fine materials from the north and south size separation areas feed into separate gravity thickeners and filter presses using separate piping, the dewatering system enables material segregation throughout the process. Each size separation area (north, south), gravity thickener (north, south) and filter press group (1-6, 7-12) can be operated in series separately from the other. Fine material and resultant filter cake originating from either unloading wharf can thus be segregated from the material originating from the other unloading wharf. The fine materials from the non-TSCA areas will thus be pumped to a gravity thickener and filter press group designated for non-TSCA material. The filter cake from these presses will be staged in a FCSE designated for non-TSCA material, where confirmatory sampling will be conducted (see Section 2.3.3 below).

During the period when filter cake from non-TSCA areas is being generated separately, the parallel size separation, gravity thickener, and filter presses may be used to dewater the fine materials from TSCA dredge areas. Filter cake from these presses will be staged in a FCSE designated for TSCA material and disposed of in a TSCA-authorized facility, regardless of its PCB concentration.

During periods when dredging is primarily from non-TSCA areas such that the capacity of the designated non-TSCA unloading wharf and associated dewatering equipment is surpassed and additional non-TSCA material needs to be unloaded, the other unloading area and size separation area will be similarly designated for non-TSCA service. This service will not begin until the system has been transitioned as described in Section 2.3.1.

Transition of dewatering system units and FCSEs from TSCA status to non-TSCA status is discussed in Section 2.3.1 below. The staging area operations for the various types of materials are discussed further in Section 2.3.2.

2.3.1 Cleaning Process

Equipment clean-out procedures will be implemented between handling of TSCA and non-TSCA materials to ensure that cross-contamination does not occur. The cleaning process will utilize water to rinse equipment surfaces that have previously been in contact with TSCA material until visually confirmed to be free of sediment. These will include equipment surfaces of on-river dredge buckets, processing facility sediment unloader buckets, and the equipment and pipelines in the size separation area. Dredge buckets will be rinsed with river water prior to exiting the dredge area. The unloader buckets and on-shore equipment will be rinsed with recycle process water. The interior of haul truck dump boxes will also be rinsed with recycle process water.

During the routine unloading process, barges will be emptied of material until the barge drafts two feet or less, leaving a residual amount of material when the barge is released from the unloading wharf for another load. To the extent practical, barges will be dedicated to non-TSCA service. Should a barge need to transition from TSCA to non-TSCA service, the empty barge used for TSCA material will be subjected to a second bucket cleaning of the barge such that only a *de minimis* quantity of TSCA material remains. The standard for changing a barge from TSCA service to non-TSCA service will be removal of all sediments practically accessible with the level-cut bucket mounted on the barge unloader, which is designed to close over a flat plane rather than making scallop-shaped bucket cuts. Once in non-TSCA service, the non-TSCA barges will only be off-loaded until they draft approximately two feet, which will leave a residual amount of non-TSCA material, thus essentially isolating any underlying *de minimis* TSCA material residue and preventing cross-contamination. Each time a barge is being cleaned to transition from TSCA service to non-TSCA service, EPA will be notified of this transition cleaning process and the estimated PCB concentration of material in the barge prior to transition, and will be provided the opportunity for inspection of the barge before it is released to the river. Empty barges cleaned at the end of the prior season for winter storage, which have not been used in TSCA service during the current dredging season, may also be used for non-TSCA service without any further actions prior to use.

Rinse water from cleaning the processing facility will either be used for recycle process water or will be treated and discharged. The size separation equipment and associated vessels

will be flushed with process water to remove solids from the equipment before initiating dewatering of non-TSCA material. Flushing will be deemed complete when solid material is no longer being discharged from the stacking conveyors for the size separation equipment. In addition, all TSCA material stockpiles in the size separation area will be transported to the designated TSCA CMSA and the pavement under the stacking conveyors in the size separation area will be rinsed before initiating dewatering of non-TSCA dredged materials in that area.

Before dedicating an unloading wharf/size separation area and its associated piping, gravity thickener tank, and filter press group for use in handling non-TSCA material, one barge containing non-TSCA material will be offloaded and processed to purge the system and the resulting filter cake will be transported to the designated TSCA FSCE. Before a FCSE is designated and used for filter cake generated from non-TSCA areas, the TSCA filter cake present in that staging enclosure will be loaded into rail cars to empty the enclosure. The pavement will be cleaned to the extent practical with a loader bucket, and will then be washed with water, prior to staging filter cake generated from dredged materials from the non-TSCA areas.

2.3.2 Staging Area Operations

The PFOC will monitor all dewatered material prior to conveying it to the respective TSCA and non-TSCA CMSAs and FCSEs and/or prior to rail car loading to confirm that the material does not contain any free liquids. Production of dewatered materials without free liquid by the PFOC is a quality control aspect and, as such, is addressed in Attachment 2 to the *Phase 2 Dredging Construction Quality Control/Quality Assurance Plan for 2013* (2013 DQAP; Parsons 2013c). In accordance with the 2013 DQAP, the paint filter liquids test (EPA Method 9095B) will be performed on initial batches of filter cake until consistency is achieved, then periodically thereafter if visual observation indicates free liquid. Testing of coarse material will be performed as needed to confirm visual observation that the material does not contain free liquids. Monitoring for free liquid will also be performed, as necessary, prior to loading material from the CMSA and FCSE staging piles.

The trucks hauling material from the size separation areas will unload the debris and the coarse TSCA and non-TSCA materials onto the asphalt pads in one of the designated staging areas (Figure 2-1). Debris and TSCA/non-TSCA coarse materials will be consolidated with a front-end loader into manageable piles. If necessary, oversized material will be reduced in size at the debris staging area to dimensions required by the disposal facility and staged separately from the other coarse materials. Filter cake will be conveyed to the FCSEs, dumped, and graded into the pile by the PFOC; as described above, filter cake from non-TSCA areas will be handled separately from all other filter cake. The CM will provide quality assurance during transport, staging, and loading to ensure that the TSCA and non-TSCA waste streams remain segregated.

2.3.3 Confirmation Testing of Non-TSCA Material

After the coarse non-TSCA materials have been dewatered and transported to the non-TSCA CMSA, the piles will be sampled to confirm, prior to shipping, that the PCB content is below

50 ppm. Similarly, the non-TSCA filter cake will be sampled in the FCSE to confirm that it contains PCB concentrations less than 50 ppm. The sampling procedures are described below.

Non-TSCA piles at the CMSA will be managed so they each contain approximately 5,000 to 8,000 cy of dewatered sediments, or roughly the amount of dewatered sediment that is contained in a unit train shipment. Non-TSCA material staging in the CMSAs will be managed and demarcated by the PFOC and sampled such that one composite sample for every 500 cy will be collected and analyzed for PCBs by Method GEHR8082. This approach will produce from 10 to 16 samples per unit-train shipment, depending on size of the unit train and density of material. Each 500 cy composite sample will consist of five grab samples from the working face of the pile. Filter cake generated from dredged material from non-TSCA areas will be managed and demarcated in the FCSE by the PFOC and sampled such that one composite sample for every 300 cy will be collected and analyzed for PCBs by Method GEHR8082. PCB results will generally be received from the laboratory within 24 to 72 hours. The 500 cy and 300 cy material lots will be demarcated until sample results are known. EPA will be notified of any lots exhibiting PCB levels $\geq$ 40 ppm prior to any re-sampling or movement of material. These lots will be further reviewed in the context of the sample results from the other lots in the non-TSCA pile. Such lots may be either:

- Re-sampled and the results re-evaluated, or
- Removed from non-TSCA material staging and loaded out with TSCA material for disposal.

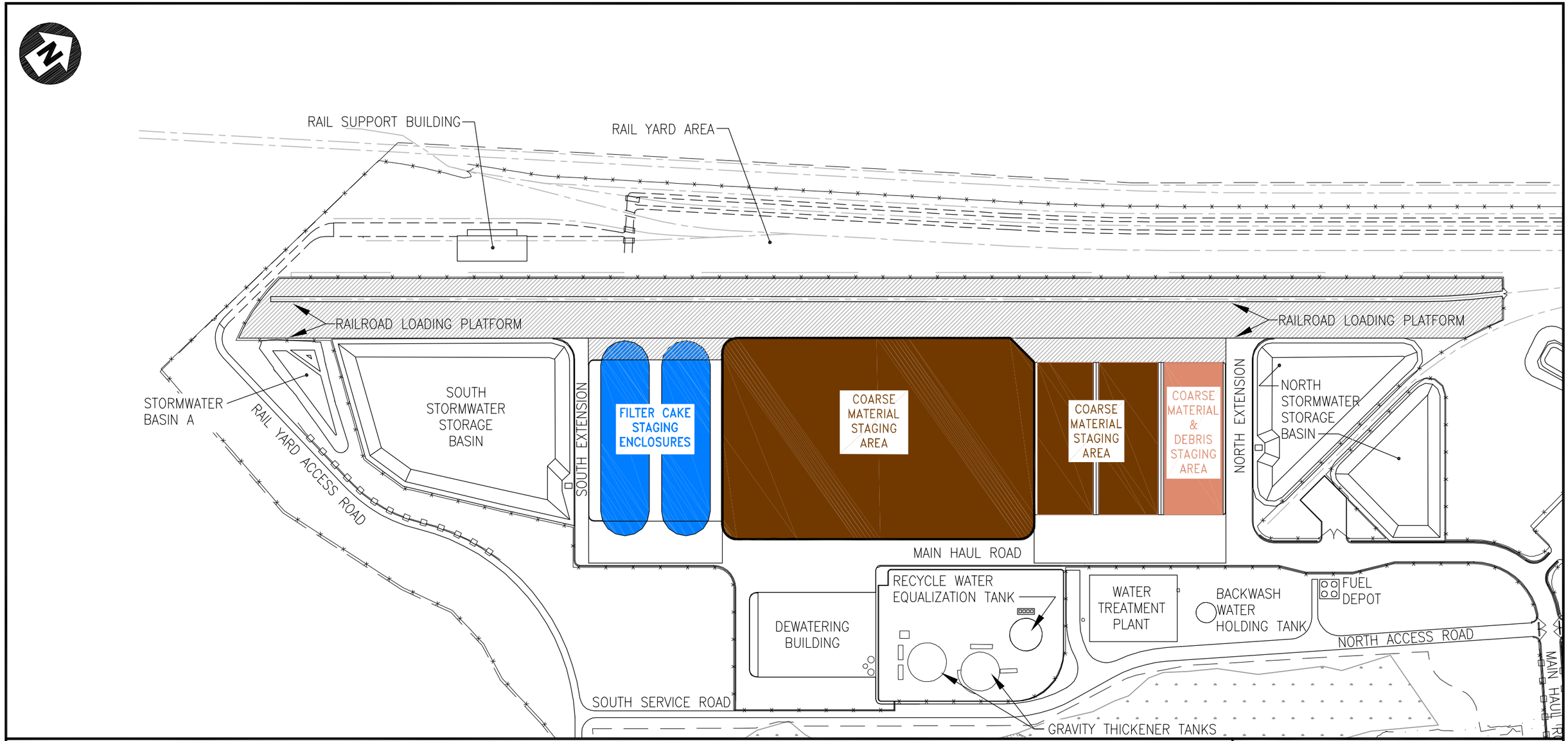
Once test data have proven that process controls are effective, and with the concurrence of the non-TSCA disposal facility and approval of EPA, the frequency of confirmation testing may be reduced. Once sample results confirm that PCB concentrations are less than 50 ppm, the material will be loaded into rail cars for shipment to a non-TSCA disposal facility. All sampling results will be made available to EPA.

Should any testing results from this re-sampling indicate that the PCB concentration in the dewatered sediments is 50 ppm or greater, the tested materials will be removed from non-TSCA staging and shipped to a TSCA-authorized landfill. The pavement under and around that portion of the pile will be cleaned, as described in Section 2.3.2, before staging additional non-TSCA materials in that area. Any material lots that initially exhibit PCB concentrations $\geq$ 50 ppm will not be re-sampled and will be disposed of as TSCA-regulated material.

2.4 AGENCY COORDINATION AND OVERSIGHT

GE will meet with EPA field representatives on a daily basis (unless EPA personnel are unavailable to meet) to review the dredging operation, including whether dredges are working in TSCA or non-TSCA areas. The proposed delineation of TSCA and/or non-TSCA dredge areas will be reviewed and approved by EPA field representatives prior to initiation of dredging in non-TSCA areas. It is also anticipated that EPA will inspect all dredging and processing

operations on a daily basis, including the segregation and management of TSCA and non-TSCA sediments staged for disposal and the testing of stockpiled sediments prior to shipment. EPA field representatives will be notified in advance of flushing of size separation equipment between handling of TSCA and non-TSCA materials, so that they can observe that cleaning prior to use of the equipment for non-TSCA materials. Further, GE will provide EPA with post-processing sediment PCB results as they are received from the analytical laboratory.



NOTES:

1. BASE MAP INFORMATION SUPPLIED BY ARCADIS AND SHAW.
2. ADDITIONAL COARSE MATERIAL STAGING AREA AND SECOND GRAVITY THICKENER TANK (NORTH) WERE CONSTRUCTED IN 2011.
3. FILTER CAKE STAGING ENCLOSURES AND COARSE MATERIAL STAGING AREAS ARE MANAGED AS BOTH TSCA AND NON-TSCA AREAS. REFER TO SECTION 2.1.

COARSE MATERIAL STAGING AREA

COARSE MATERIAL & DEBRIS STAGING AREA

FILTER CAKE STAGING ENCLOSURES

200 75 0 200

SCALE: 1" = 200'

LEGEND:

GUIDE RAIL

SITE PERIMETER FENCE

FORESTED AREA

EMERGENT WETLANDS

SITE ACCESS ROAD FROM ROUTE 196

RAILROAD LOADING PLATFORM

FIGURE 2-1

GENERAL ELECTRIC COMPANY
HUDSON RIVER PCBs SUPERFUND SITE
TRANSPORTATION AND DISPOSAL PLAN

MATERIAL MANAGEMENT AREAS

PARSONS

GE COMPANY - PARSONS PROJECT OFFICE, BUILDING 40-2, 381 BROADWAY FT. EDWARD, NY 12828

FILE NAME: P:\GE HUDSON RIVER\442209 PHASE 2\09.0 REFERENCE DOCUMENTS\9.6 RAWP-2 CAD DWGS\442209-PFSP-FIGURES-2-1(10-24-12).DWG
PLOT DATE: 1/15/2013 2:10 PM PLOTTED BY: GOLDTHWAIT, JAMES

SECTION 3

WASTE DESTINATIONS

Consistent with the approach of separately managing TSCA and non-TSCA materials for disposal during the 2013 season, GE has selected separate commercial disposal facilities to receive and dispose of the TSCA and non-TSCA waste materials during 2013. These include two TSCA-authorized disposal facilities and one non-TSCA facility. Each of the TSCA-authorized facilities holds a currently effective permit from EPA for PCB waste management pursuant to TSCA and appropriate other permits from EPA and/or its host state to receive, handle, and dispose of the GE Hudson River material. The non-TSCA facility is authorized by the host state in accordance with RCRA Subtitle D standards, and thus holds the necessary permits to receive, handle, and dispose of the GE Hudson River non-TSCA material.

A summary description of each disposal facility selected by GE to receive dewatered sediment is provided in Attachment C. That attachment provides key information on each facility, including name and location, applicable waste management methods, and a list of relevant permits. The 2013 dredged and dewatered material will be transported to one or more of these facilities for disposal.

GE may from time to time add or change selected disposal facilities. Prior to shipping waste to new facilities not listed in Attachment C, GE will issue an updated Attachment C to EPA. In addition, prior to commencing waste shipments to a disposal facility, GE will:

- Obtain EPA clearance for the new disposal facility(ies) in accordance with CD Paragraph 23.c (unless already received); and
- Notify receiving state regulators of impending shipments in accordance with CD Paragraph 23.a.

SECTION 4

TRANSPORTATION

All of the dewatered sediments and debris produced during the 2013 season will be transported by railroad from the processing facility site to one or more of the commercial disposal facilities identified and described in Attachment C. As stated in Section 5.3 of the *Phase 2 Performance Standards Compliance Plan for 2013* (Appendix D to the 2013 RAWP), all materials dredged in 2013 will be dewatered and shipped off-site for disposal by the end of that calendar year (rather than being stockpiled for disposal the following dredging season) unless doing so is prevented by delays attributable to disposal facility(ies) and/or rail carriers.

4.1 RAIL PROCEDURES

To transport the waste from the processing facility site to the disposal facilities, the project will utilize unit trains, which will be dedicated to the project. The rail cars making up the dedicated unit trains will be leased to GE. It is anticipated that unit trains containing between 56 and 98 rail cars will generally be utilized, depending on the disposal location, with additional rail cars reserved as spares. The railroads will provide locomotive power for the unit trains.

Dewatered TSCA and non-TSCA sediments, as well as debris (to be managed as TSCA material), will be loaded into rail cars from staging areas along the processing facility site rail yard. Rail yard operations consist of activities required to set up outbound loaded trains and receive inbound empty trains. Before being loaded at the processing facility, each rail car will be fitted by the PFOC with the container which is a waste enveloping liner system or "packaging" pursuant to the applicable DOT regulatory requirements in 49 CFR 173.240 for "sift-proof packaging." Non-TSCA materials will be managed and packaged for rail shipment using the same waste enveloping liner system and strict procedures that EPA has approved for TSCA-regulated materials and will be subject to EPA oversight. The rail car loading and cleaning procedures, including packaging, and unit train assembly procedures, are described in Section 5.

Once a train is loaded, it will travel from the processing facility site to the disposal facility(ies) via the trackage of the railroads involved in the movement. As noted above, there will be separate unit trains, with different destinations, for transporting TSCA and non-TSCA materials. On average, one unit train of loaded rail cars should depart the rail yard, and one unit train of empty cars should arrive at the rail yard, every two to five days during the shipment period. The actual frequency of train movement will vary based on railroad scheduling, rate of loading, rate of unloading, and other factors. A round-trip cycle of a loaded unit train to the disposal facility for unloading and return to the processing facility site is estimated to require approximately 1.5 to 2 weeks. However, actual times are expected to vary due to railroad scheduling factors and travel time required to and from the selected disposal facility.

It is also possible that, at the beginning and/or end of the shipment period or under other conditions, project materials may be transported to the disposal site in less than unit train service. In such cases, rail cars with project materials will be added to the originating railroad's trains carrying rail cars with other commodities, based on the existing agreement with the railroads. This arrangement is called "manifest service" in the railroad industry.

4.2 RAIL CARRIERS AND ROUTES

Railroad companies operating under confidential railroad transportation agreements with GE will be responsible for transporting the dewatered sediment from the processing facility site to the disposal site(s).

Transportation of rail cars loaded with project materials will be under the care and custody of the railroads and will be routed pursuant to the rail transportation agreements and applicable laws and regulations. The routing of project unit trains will be selected by the Class 1 railroads.

SECTION 5

ON-SITE TRAFFIC CONTROL AND LOADING PROCEDURES

This section describes the transfer of dewatered TSCA and non-TSCA sediments, as well as debris, from the staging areas to the unit-train rail cars. Preparation of rail cars and transfer of material from staging areas and loading into rail cars will be handled by the PFOC. On-site transfer activities will involve handling of the five categories of material described in Section 2: (1) debris (managed as TSCA-regulated material); (2) coarse material with PCB concentrations of 50 ppm or greater (managed as TSCA-regulated material); (3) coarse material with PCB concentrations less than 50 ppm (managed as non-TSCA material); (4) fine material/filter cake with PCB concentrations of 50 ppm or greater (managed as TSCA-regulated material); and (5) fine material/filter cake with PCB concentrations less than 50 ppm (managed as non-TSCA material). (Materials in categories 1, 2, and 4 are referred to below as TSCA materials, and materials in categories 3 and 5 are referred to below as non-TSCA materials.) The RYOC will position rail cars for loading and perform final tests and inspections prior to releasing rail cars to the initial rail carrier, Canadian Pacific Railway (CPR).

5.1 RAIL CAR LOADING PROCEDURES

Dewatered dredged material will be loaded from staging areas into rail cars. From the staging areas, the TSCA and non-TSCA coarse materials and the debris will be loaded into rail cars via front-end loaders. Front-end loaders will also work the stockpiles of TSCA and non-TSCA filter cake and convey those materials to rail cars positioned along the loading platform. There will be separate rail cars and unit trains for the non-TSCA materials and for the TSCA materials (including debris). Front-end loaders will be cleaned and visually inspected between transport of TSCA and non-TSCA materials, as described in Section 2.3.1.

5.1.1 Packaging, Rail Car Preparation, and Loading

Dewatered sediments and debris will be packaged in accordance with applicable DOT standards. Packaging, rail car preparation, and loading procedures will be the same for both TSCA and non-TSCA materials.

Packaging will be accomplished by the PFOC using a US DOT certified IP-1 waste-enveloping rail car liner fitted to an open-top gondola rail car with open weep holes.

For TSCA materials, packaging will be marked as containing PCBs in accordance with EPA's TSCA regulations (40 CFR Part 761, Subpart C). Specifically, PCB ML labels will be affixed to the liner after closure in two locations so as to be readily visible. Those rail cars will also be marked on both sides with a PCB ML label. Rail cars will also be placarded with the UN3432 placard in accordance with DOT requirements.

Marking, labeling and placarding requirements are not applicable to non-TSCA material. Thus, for non-TSCA materials, in-transit material identification will be accomplished by use of the rail bill of lading provided to the railroad. Packaging will be not be marked and rail cars will not be marked or placarded. The bill of lading will include the shipping name indicating that the material is contaminated.

The liners will be disposed of along with received waste at the disposal site. Under this approach, returning empty rail cars will arrive at the rail yard uncovered and without liners. The RYOC will position the empty rail cars on the loading track within the "Exclusion Zone" (EZ) (described below in Section 8) and inspect the interior and exterior condition of each rail car. After inspection and removal of incidental materials and/or water accumulated from the road or from previous shipments, if any, the PFOC will carefully install the rail car liner into each rail car that is to be loaded by first placing the folded package into the rail car with a lull loader. The liner will then be unfolded to each end of the car and the hems placed over each side of the car and the flaps over the ends of the cars. After inspecting for a uniform fit and integrity of the liner, the car will be loaded with dredged sediment, debris and/or filter cake.

Front-end loaders equipped with Loadrite Bucket scales (or equivalent) will be used to remove materials from the TSCA and non-TSCA FCSEs, the TSCA and non-TSCA CMSAs, and the debris staging area, as applicable. The loaders will transport the material along the block of lined rail cars and load the material directly into the rail cars until the weight reaches between 103 and 108 net tons of material, depending on the tare weight of the rail car. The PFOC will control the loaded weight using loader bucket scales confirmed by the rail yard weigh-in-motion scale (further described below). The PFOC will periodically field calibrate the bucket scales to assure accuracy. Once the rail car is loaded, the PFOC will fold the liner inside of the rail car on top of the load. End and side flaps will be secured in accordance with the liner-specific procedures. Securing the flaps with manufacturer-provided ropes and bungee cords effectively creates a complete envelope surrounding the loaded material.

5.1.2 Loading Inspection

The PFOC will inspect the rail cars prior to the completion of work in the loading zone; this inspection will be verified by the RYOC. This inspection will include, but not be limited to, visually ensuring that:

- Rail cars have not been knocked off center in the loading process;
- All liners are properly secured;
- No safety appliances have been damaged; and
- No material being loaded into rail cars is loose on the outside of the rail equipment.

The RYOC will further confirm by visual inspection that all equipment is sufficiently clear to allow safe rail car movement.

5.2 RAIL YARD PROCEDURES AND ASSEMBLY OF UNIT TRAINS

The RYOC will switch empty and loaded rail cars on and off the loading track. Rail cars to be switched on and off this track will typically consist of 40- to 41-car blocks to be assembled into unit trains. The RYOC will also weigh outbound loaded rail cars to confirm that weights are within allowable ranges for transport, meets the required load balance on the trucks, and will assemble, inspect, and make necessary repairs to outbound loaded rail cars. In accordance with specifications, the RYOC will confirm the empty weights of the rail cars at the beginning of the 2013 season to enable determination of net loaded weight. After a rail car block has been loaded and secured for transport, the RYOC will move the train across the weigh-in-motion scale and position it on a receiving/departure (R&D) track. It will then be combined with other blocks of rail cars containing the same type of materials (i.e., TSCA or non-TSCA) to make up a full unit train.

Once the unit train has been assembled and tracks properly secured, an initial terminal air test will be administered in accordance with 49 CFR § 232.217 (train brake tests using yard air). Additionally, inspection of end-of-train devices in accordance with 49 CFR § 232.409 will be completed by CPR as part of the initial terminal test.

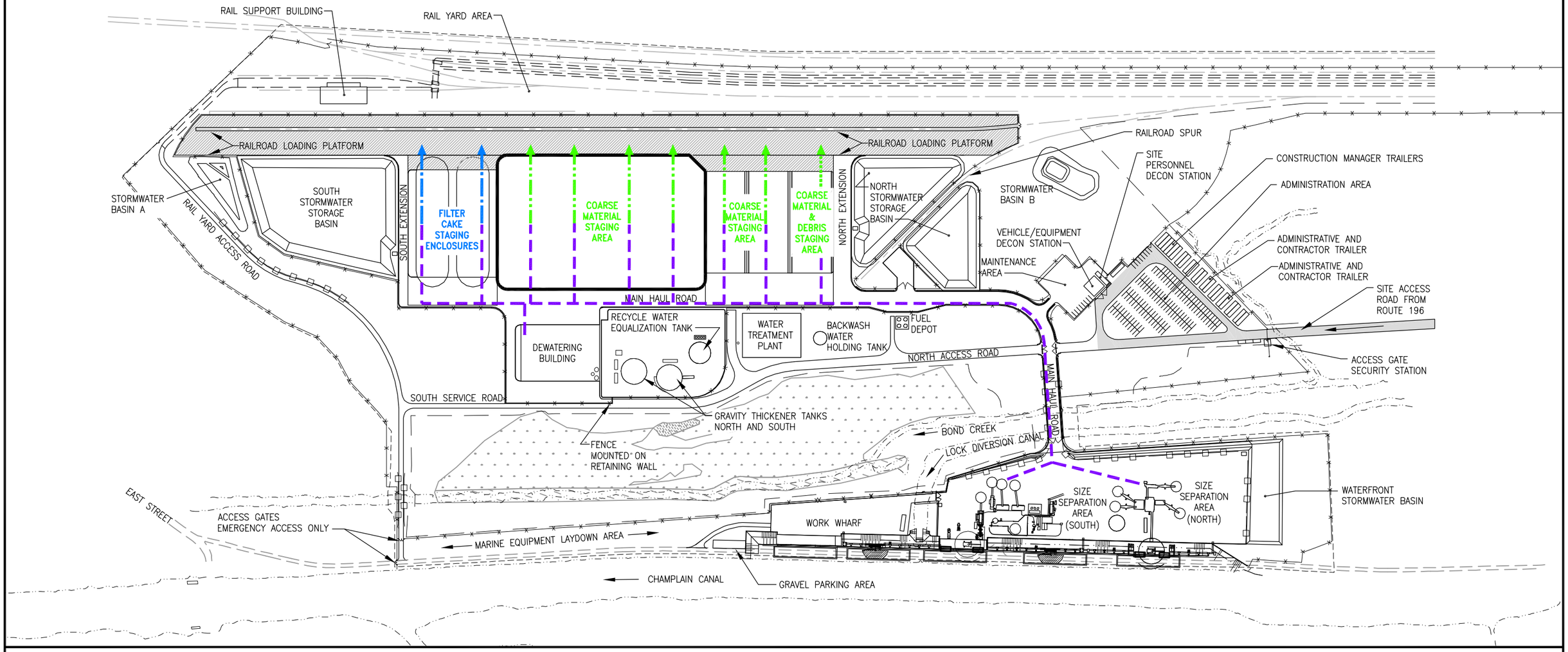
The RYOC will prepare necessary documentation of the above-described weighing and inspections, including rail manifests (bills of lading). Information for rail and waste manifests and other necessary documentation will be provided to the CM for review and approval. Authorized representatives for GE and CPR will sign the manifests, enabling the assembled unit train to be released for transportation to the designated disposal facility.

An electronic copy of rail and waste manifests will be transmitted to CPR through an electronic data interchange (EDI) protocol and via email, as established with CPR. After these steps have been completed, the outbound unit train will be picked up by CPR in accordance with the project operating schedule.

5.3 INSPECTION AND RELEASE OF RAIL CARS USED FOR SHIPMENTS

Rail cars in service for transporting material for disposal will be routinely cleaned after unloading at the disposal site(s). Cleaning of the rail car will be conducted by scraping and sweeping the interior of the rail cars, vacuuming the interior of the rail cars if required, and cleaning out foot holes and weep holes. The exterior of the rail car will be inspected and any visible sediment will be swept off and, if necessary, the area rinsed. This cleaning procedure at the disposal facility will be adequate to ensure that a rail car can be used for transport of either TSCA or non-TSCA material.

Prior to release from the project, rail cars will be inspected and sampled pursuant to the *Empty Rail Car Inspection and Release Procedure* provided in Attachment D. This procedure is specifically applicable to the GE Hudson River Project and was used during Phase 1 and Phase 2 Years 1 and 2.



NOTES:

1. BASE MAP INFORMATION SUPPLIED BY ARCADIS AND SHAW.
2. ADDITIONAL COARSE MATERIAL STAGING AREA AND SECOND GRAVITY THICKENER TANK (NORTH) WERE CONSTRUCTED IN 2011.
3. SIZE SEPARATION AREA (NORTH) WAS CONSTRUCTED IN 2012.
4. FILTER CAKE STAGING ENCLOSURES AND COARSE MATERIAL STAGING AREAS ARE MANAGED AS BOTH TSCA AND NON-TSCA AREAS. REFER TO SECTION 2.1.

- MATERIAL TRANSPORT TO STAGING AREAS & FILTER CAKE STAGING ENCLOSURES
- COARSE MATERIAL LOADING TO RAIL YARD PLATFORM
- COARSE MATERIAL & DEBRIS LOADING TO RAIL YARD PLATFORM
- FILTER CAKE LOADING TO RAIL YARD PLATFORM

LEGEND:

- GUIDE RAIL
- SITE PERIMETER FENCE
- FORESTED AREA
- EMERGENT WETLANDS
- SITE ACCESS ROAD FROM ROUTE 196
- RAILROAD LOADING PLATFORM

300 150 0 300

SCALE: 1" = 300'

FIGURE 5-1

GENERAL ELECTRIC COMPANY
HUDSON RIVER PCBs SUPERFUND SITE
TRANSPORTATION AND DISPOSAL PLAN

ON-SITE MATERIAL TRANSPORT ROUTES (PROCESSING & RAIL YARD FACILITY)

PARSONS

GE COMPANY - PARSONS PROJECT OFFICE, BUILDING 40-2, 381 BROADWAY FT. EDWARD, NY 12828

FILE NAME: P:\GE HUDSON RIVER\442209 PHASE 2\09.0 REFERENCE DOCUMENTS\9.6 RAWP-2 CAD DWGS\442209-PFSP-FIGURES-2013.DWG
PLOT DATE: 3/19/2013 11:01 AM PLOTTED BY: GOLDTHWAIT, JAMES

SECTION 6

RECORDKEEPING

This section describes pre-shipment notifications, recordkeeping, and tracking of waste transport and disposal activities.

6.1 PRE-SHIPMENT NOTIFICATIONS

In accordance with Paragraph 23.c of the CD, GE has obtained EPA's determination that each selected disposal facility is acceptable under CERCLA for disposal of material from the processing facility. As further required by Paragraph 23 of the CD, prior to any shipments of waste materials from the processing facility site to a disposal site, GE will provide written notification to the state where the selected disposal facility is located, as well as to EPA and NYSDEC, of the anticipated shipments of waste material to that facility during the upcoming year. Such notification will include the information specified in Paragraph 23.a of the CD – i.e., the name and location of the disposal facility, the type and quantity of waste material to be shipped, the expected schedule for shipment (to the extent available), and the method of transportation.

6.2 OVERVIEW OF RECORDKEEPING PROCESS

6.2.1 TSCA Waste

EPA, NYSDEC, and receiving states have regulations and procedures for manifesting and tracking shipments of regulated PCB waste through the transport and disposal process. In accordance with those requirements, the following procedures will be utilized for the tracking of TSCA materials from the processing facility to the disposal facility(ies).

EPA's regulations under TSCA require that generators, transporters, and disposers of PCB wastes subject to those regulations possess EPA identification numbers (40 CFR § 761.202). GE has submitted EPA Form 7710-53 to EPA and obtained EPA ID number NYD980763841. As the waste generator, GE will use this EPA ID number for PCB waste reporting and shipping control for TSCA materials, as further discussed below.

Pursuant to EPA's TSCA regulations (40 CFR § 761.207) and NYSDEC's regulations for generators of hazardous waste (including wastes containing PCBs $\geq$ 50 ppm) (6 NYCRR § 372.2(b)), GE as generator of PCB wastes that are determined to constitute TSCA materials will use the EPA "Uniform Hazardous Waste Manifest" (UHW Manifest) form (EPA Form 8700-22 and, if necessary, continuation sheet Form 8700-22A) to track shipments from the point of generation (the processing facility site, as described above) to the authorized waste disposal site. The associated TSCA regulations relating to the manifesting procedures (40 CFR §§ 761.207-.215) will also be followed. GE, the receiving and delivering transporters, and the disposal facility operator(s) or their representatives will be required to sign the manifest, retain a

copy for themselves, and ensure that sufficient copies accompany the waste shipment. More detailed information on the manifesting procedures for this waste is provided in Section 6.3 below.

6.2.2 Non-TSCA Waste

Non-TSCA waste materials will be shipped to a facility permitted by the host state in conformance with state and RCRA Subtitle D standards. The manifesting procedures to be followed for this waste are described in Section 6.4. GE, the receiving and delivering transporters, and the disposal facility operator(s) or their representatives will be required to sign the manifest and thus document proper disposition of the material.

6.3 WASTE MANIFESTING PROCEDURES FOR TSCA MATERIALS

Both EPA's TSCA regulations and NYSDEC's hazardous waste management regulations require tracking of PCB waste subject to those regulations from "cradle to grave" – from when it leaves the point of generation until it arrives at the disposal site. The UHW Manifest form is used by waste generators to designate the disposal facility. The manifest accompanies the waste and must be signed by the generator (GE) or its representative, the transporter(s) (railroads), and the receiving facility. To track each shipment, the NYSDEC regulations require the generator to mail a copy of the manifest form to NYSDEC within ten days of shipment (6 NYCRR § 372.2(b)(3)(iii)). For the TSCA wastes shipped from the processing facility site, GE will send copies of the generator manifests to EPA and NYSDEC. The waste disposal facility will be responsible for reporting to its respective agency in accordance with applicable state requirements.

A sample of the UHW Manifest form, EPA Form 8700-22 and 8700-22A (continuation sheet), and detailed instructions regarding these forms are provided in Attachment E.

6.3.1 TSCA Manifesting Procedures for Unit Train Shipments

Because virtually all shipments of TSCA materials are expected to be via unit trains composed solely of project rail cars, a single manifest will be utilized to manage each shipment. A UHW Manifest form will be prepared and completed for each loaded train. Since each rail car will be weighed individually at the generating site and in the trucks trans-loading the material at the disposal site, a listing of rail cars in each unit train will be prepared, noted on the manifest, and attached to the manifest. This listing will include rail car serial numbers and loaded net weight for each car. The listing will enable the disposal site to confirm loaded weights on a car-by-car basis and thus overall receipt of the shipment.

The GE-designated personnel will complete the generator portion of the waste manifest in accordance with manifest instructions and NYSDEC procedures for issuance to the railroad. NYSDEC waste code "B007" for "Other PCB Wastes…including dredge material" will be used for all categories of dewatered TSCA materials (i.e., debris, coarse TSCA material, and TSCA

filter cake). Following rail car weighing, the RYOC will document the proper weight of waste in kilograms (net weight of waste, not the gross weight including rail car). The CM will complete the waste manifest for review, approval, and signature by GE or its representative and CPR as the originating rail carrier. The CM will then process the retained manifest copies on behalf of GE as described below.

After copying for records, the CM will send the signed waste manifest to the disposal site, with copies to EPA and NYSDEC within ten days of the date of shipment. The signed manifest copy will include the listing of rail cars, their serial numbers, and net weight of contained sediment.

The railroad companies are responsible for ensuring that the rail manifest or shipping paper (bill of lading) containing the waste manifest information (except for EPA ID numbers, generator certification, and signatures) accompanies the PCB waste at all times. The originating railroad will sign the waste manifest to document acceptance for delivery. The selected waste disposal facility will confirm receipt of all waste (after weighing and inspection pursuant to disposal site procedures), sign the waste manifest, and return a signed copy of the manifest to GE to confirm receipt. The selected waste disposal facility will also report to the state regulatory agency in accordance with its permit and state requirements. The CM will match this confirming manifest with the original retained copy to document completion of the shipment.

6.3.2 TSCA Manifesting Procedures for Train Shipments in Less Than Unit Train Service

As noted in Section 4.1, it is possible that, under some conditions, project materials may be transported to the disposal site in less than unit train service. In such cases, rail cars of project materials will be added to trains containing rail cars of other commodities. This arrangement is called “manifest service” in the railroad industry (although that name is not related to the UHW Manifests discussed herein). In this situation, for rail cars containing TSCA materials, GE will issue a UHW Manifest form for each individual rail car. Other aspects of the UHW Manifest procedures will be the same as described in Section 6.3.1.

6.4 WASTE MANIFESTING PROCEDURES FOR NON-TSCA MATERIALS

Non-TSCA materials are not subject to federal or New York State hazardous waste manifesting requirements. In addition, the host state of the selected non-TSCA disposal facility has no manifesting requirements for non-hazardous material. However, to ensure controlled disposition of material, GE will use a non-hazardous waste manifest form consistent with the form contained in Attachment F.

6.5 RECORDS MANAGEMENT AND RETENTION

A hard copy file of all the waste manifests and rail manifests as well as a scanned copy will be retained. GE and its contractors and agents will retain waste generation, transportation, and disposal records in accordance with the records retention requirement stated in Paragraph 121.a

of the CD to preserve and retain all non-identical copies of such records and documents until 10 years after receipt of EPA's Certification of Completion of the Work. In addition, at the conclusion of the document retention period, GE will notify the EPA at least 90 days prior to the destruction of any such records or documents, as provided in Paragraph 122 of the CD, and will, upon request, deliver such documents to EPA.

6.6 REQUIRED REPORTING

6.6.1 TSCA Waste Shipments

GE will mail or hand deliver all UHW Manifest copies and related correspondence to:

Director, Hudson River Field Office
U.S. Environmental Protection Agency
412 Lower Main Street
Hudson Falls, NY 12839

and to:

New York State Department of Environmental Conservation
Division of Environmental Remediation
625 Broadway
Albany, NY 12233-7252

Manifest Section Contact Information
Phone: (518) 402-8730
Fax: (518) 402- 8654
E-Mail: manifest@gw.dec.state.ny.us

Significant differences between the manifest information and what the transporter or disposal facility finds with the waste shipment will be documented in the discrepancy indication space on the manifest form. Discrepancies will be managed by the CM in accordance with the procedures set forth in 40 CFR § 761.210. For potential rejected loads, the waste disposal facility will notify GE before any loads are rejected. If a shipment must be returned to GE, the appropriate portion of the same manifest will be completed accordingly.

Exception reporting will be managed in accordance with 40 CFR § 761.215. All shipment receipts must be confirmed via signed manifest copy within 35 days of shipment. If, within 35 days of the date of shipment, GE has not received a signed copy of the manifest from the waste disposal facility, GE will contact the railroad and the disposal facility and determine the status of the shipment and related documentation. If, within 45 days of the date of shipment, GE has not received the completed manifest copy, GE will notify EPA and outline the efforts being taken to confirm the shipment completion.

In accordance with 40 CFR § 761.218, the waste disposal facility will issue a Certificate of Disposal to GE within 30 calendar days of the date on which the disposal of PCB waste identified on the manifest was completed. This certificate will include:

- The identity of the disposal facility, by name, address, and EPA identification number;
- The identity of PCB waste referenced by the manifest number for the shipment;
- A statement certifying the fact of disposal of the identified PCB waste, including the date(s) of disposal, and identifying the disposal process used; and
- A certification as defined in 40 CFR § 761.3.

NYSDEC regulations include a requirement for the generator of any hazardous waste shipped off-site to submit an annual report on such shipments by March 1 of the following year (6 NYCRR § 372.2(c)(2)). To address this annual reporting requirement for the off-site hazardous waste shipments during the 2013 season, GE will prepare a report covering the total quantity of hazardous waste (as defined under these regulations) transported and disposed of in 2013, and will submit the report to NYSDEC, with copy to EPA, by March 1, 2014. For purposes of this reporting, given the New York regulatory definition of hazardous waste as including materials containing PCB concentrations of 50 ppm or greater (6 NYCRR § 371.4(e)), the hazardous waste subject to these requirements will consist of those dredged materials that are determined to contain PCBs at concentrations of 50 ppm or greater based on post-processing, pre-shipment sampling (or, for debris and other materials that are not sampled after processing, that are assumed to contained PCB concentrations at or above 50 ppm).

6.6.2 Non-TSCA Waste Shipments

Although there are no applicable federal or state manifesting requirements related to non-TSCA waste shipments, GE will follow similar procedures for manifest utilization identified for TSCA materials. Manifest information will be tracked and reviewed to ensure that there are no discrepancies between the transporter and the disposal facility. GE will follow up with the facility to confirm receipt of all waste. Non-TSCA waste shipment information will be included in the annual report to EPA required under the CD.

In addition, although certification of disposal is not required by regulations for non-TSCA material, GE will obtain a Certificate of Disposal from the commercial disposal facility within 30 calendar days of the date on which the disposal of the non-TSCA waste identified on the manifest was completed. This certificate will include:

- The identity of the disposal facility, by name, address, and EPA identification number;
- The identity of non-TSCA waste referenced by the manifest number for the shipment; and
- A statement signed by the authorized disposal facility representative, documenting the fact of disposal of the identified waste, including the date(s) of disposal, and identifying the disposal process used.

SECTION 7

HEALTH AND SAFETY

This section provides an overview of the health and safety plans in effect at the processing facility site, including the rail yard. Health and safety oversight at the processing facility site is the responsibility of the CM. Once a unit train departs from the processing facility site, health and safety oversight during transport to the disposal site is the responsibility of the railroad companies. Upon receipt of dewatered sediment and debris shipments at the disposal facility, health and safety oversight becomes the responsibility of the disposal site owner/operator.

7.1 RA HASP

A *Phase 2 Remedial Action Health and Safety Plan for 2013* (2013 RA HASP; Parsons, 2013d) defines minimum safety and health requirements, guidelines, and practices applicable to the overall 2013 RA project, including the processing facility and rail yard operations. For complete details on the project health and safety program, please refer to that 2013 RA HASP.

The 2013 RA HASP reflects the corporate policy of both GE and the CM. It uses the zero incident management approach and defines the safety goal for this project as *zero incidents and zero injuries.*

The 2013 RA HASP provides a general description of anticipated types of field activities. Specific field activities are described in more detail in the Contractor Health and Safety Plans (HASPs) (see Section 7.2). The objectives of the 2013 RA HASP are to:

- Establish minimum health and safety requirements;
- Identify the physical, chemical, and biological hazards potentially present during field work associated with the 2013 RAWP;
- Prescribe the protective measures necessary to control those hazards;
- Define emergency procedures; and
- Prescribe training and medical qualification criteria for site personnel.

The 2013 RA HASP must be reviewed by all contractor and subcontractor managers, supervisors, foremen, and safety personnel. All project personnel performing field activities will receive a site-specific project orientation summarizing the content of the 2013 RA HASP.

The 2013 RA HASP was written to comply with the requirements of the Occupational Safety and Health Administration (OSHA) Hazardous Waste Operations and Emergency Response Standard (29 CFR § 1910.120). All activities covered by the 2013 RA HASP will be conducted in compliance with applicable federal, state, and local health and safety regulations,

including 29 CFR § 1910.120 and, for rail yard operations, applicable Federal Railroad Administration safety regulations (49 CFR Part 214, Subpart C).

7.2 CONTRACTOR HASP

Under the 2013 RA HASP and project specifications, each contractor is required to prepare a "worker HASP" (referred to herein as Contractor HASP). Each Contractor HASP is required to discuss tasks and provide detailed procedures and activity hazard analyses specific to its scope of work. Each Contractor HASP is required to conform to the 2013 RA HASP.

The PFOC's HASP and the RYOC's HASP cover on-site transport of dewatered sediment, and associated activities, specifically including:

- Traffic safety during on-site transport of materials to staging areas and the loading track – addressing how loaders, ground personnel, rail yard personnel, and other contractor personnel will interact safely in the loading and staging areas;
- Preparation of rail cars for loading, including the removal and replacement of rail car lids (if utilized), lining of cars, and securing of packaging in preparation for transport;
- Handling and loading of coarse material, debris, and filter cake into rail cars;
- Applicable personnel training for rail yard operations;
- Inspection of cars, as well as procedures for identifying "bad-order" rail cars, to assure that only safe cars are deployed for unit train make-up;
- Movement of cars within the rail yard and on and off of the rail yard's passing siding within the CPR safety zone, including coordination with the railroad company for this purpose; and
- Track, facility, and equipment inspection, maintenance and repair.

SECTION 8

CONTINGENCY PLANS FOR SPILLS THAT OCCUR IN THE WORK AREA

This section describes the approach for response to spills that may potentially occur in the work area from the point in the process that dewatered sediment is transported from staging areas to rail cars.

A key design feature of the processing facility is the EZ, which is a segregated and controlled area of the site in which all PCB material management will occur. A chain-link fence separates the EZ from other areas. The EZ is further described in Section 5.1 of the 2013 Facility O&M Plan. In addition to other areas where PCB-containing material will be handled, the EZ includes the FCSEs, the CMSAs, the debris staging area, and the rail loading platform. Loaded rail cars will be closed and secured within the EZ. Drainage from the EZ is considered Type I storm water and will be controlled such that storm water runoff is collected and treated before discharge. After loaded rail cars are closed, secured, and inspected, they may be moved outside the EZ into the rail yard pending final train assembly. The rail yard is outside the EZ. Drainage from the rail yard is considered Type II storm water, which will be collected and conveyed to on-site detention basins prior to discharge to Bond Creek.

Potential for spills in the work area will be managed by engineered controls (containment and treatment for Type I and Type II storm water) and management plans with specific contingent measures for prevention and response. These plans are Storm Water Pollution Prevention Plans (SWPPP) and Spill Prevention, Control and Countermeasure (SPCC) Plans. Since all processing and handling of dredged materials before transport will occur in the EZ of the work area, which is designed and constructed with engineered controls, spillage of dredged sediment within this area will not be considered a spill or release to the environment prompting planned response or reporting. Response to spillage of dredged materials that may occur outside the EZ will be managed in accordance with the contractors' SPCC Plans, which are further discussed below.

8.1 STORM WATER POLLUTION PREVENTION

As described above, the on-site work area is engineered for Type I or Type II storm water control. The Type I storm water collection and conveyance system provides containment of potentially PCB-contaminated storm water and prevents off-site PCB migration. Type I storm water is collected in retention basins, pumped to the water treatment building, and treated in parallel with process water removed during sediment dewatering operations. Type II storm water is collected and conveyed to on-site retention basins prior to discharge.

The storm water system has been and will continue to be maintained by the respective project contractors. The PFOC and RYOC will perform this maintenance during 2013 facility operations in accordance with project operating plans required by technical specifications of Contract 30 and Contract 60, respectively. In accordance with the technical specifications, the RYOC will implement a site-specific SWPPP meeting the substantive provisions of the New York State Pollution Discharge Elimination System General Permit for Storm Water Discharges. This SWPPP provides storm water system inspection and maintenance procedures for the work area and also addresses pollution prevention measures that the RYOC will follow to prevent spillage and releases from becoming pollutant sources in storm water. The RYOC's SWPPP is maintained on-site and will be available for EPA review. The storm water management system is also discussed in Section 5.3.2 of the 2013 Facility O&M Plan.

8.2 SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLANS

8.2.1 Site-wide SPCC Plan

As discussed in Section 5.3.1 of the 2013 Facility O&M Plan, GE has prepared and implemented a Site-wide SPCC Plan governing storage and management of petroleum, oils, and lubricants (POL) and response to POL spills at the processing facility. This SPCC Plan meets the applicable requirements of 6 NYCRR Parts 611 through 614 and 40 CFR Parts 110 and 112. It establishes overall spill prevention and contingency measures for various potential types of POL spills resulting from all site contractor activities. The Site-wide SPCC Plan was certified by a registered professional engineer in the State of New York, and is maintained at the site and is available for inspection by EPA upon request.

8.2.2 Contractor SPCC Plans

In addition to the Site-wide SPCC Plan, in accordance with the project technical specifications, the PFOC and the RYOC have each prepared and will implement a comprehensive SPCC Plan. These SPCC Plans provide contingency measures for potential spills resulting from these contractors' activities. These contractor SPCC Plans conform to the Site-wide SPCC Plan as well as project technical specifications. They are maintained on-site and are available for EPA review. In addition to POL storage and management activities, these SPCC Plans address prevention and response to spills, including spills or releases of processed sediments outside the EZ (including, for the RYOC's plan, the rail yard outside that zone). Topics covered include:

- Spill prevention means, methods, and procedures;
- Spill response means, methods, and procedures;
- Materials and equipment maintained on-site for spill response;
- Notification, reporting, and follow-up; and
- Personnel assignments, responsibilities, and training.

Each of these contractors will perform inspections and tests and keep records pursuant to its SPCC Plan. Any stored hazardous materials subject to spill control reporting such as fuel or chemicals are described in the SPCC Plan. Monitoring will be required to ensure that control measures are functioning properly to prevent a spill from reaching navigable waters, and that countermeasures to contain, clean up, and mitigate the effects of a spill are effective. Monitoring for releases of identified materials will be combined with routine inspections. After response to any spill of covered materials, the necessary decontamination and reporting will be undertaken in accordance with the SPCC Plan.

Additional information on control measures for and responses to spills at the processing facility (including the PFOC's and RYOC's SPCC Plans) is provided in Section 5.3.1 of the 2013 Facility O&M Plan, and decontamination of personnel and equipment is described in Section 5.2 of that plan.

SECTION 9

REFERENCES

Anchor QEA, LLC. 2012. *Work Plan for In-Situ Sediment Characterization for Disposal, Hudson River Dredging Project*. Prepared for General Electric Company, Albany, New York. February.

Environmental Protection Agency. 2002. *Hudson River PCBs Site. Record of Decision*. February.

Environmental Protection Agency and General Electric Company. 2005. *Consent Decree in United States v. General Electric Company, Civil Action No. 1:05-cv-1270,* lodged in United States District Court for the Northern District of New York, October 6, 2005; final judgment entered November 2, 2006.

Parsons. 2013a. *Remedial Action Work Plan for Phase 2 Dredging and Facility Operations in 2013 – Hudson River PCBs Superfund Site* (2013 RAWP). Prepared for General Electric Company, Albany, New York. February.

Parsons. 2013b. *Phase 2 Facility Operations and Maintenance Plan for 2013 – Hudson River PCBs Superfund Site* (Appendix B to 2013 RAWP). Prepared for General Electric Company, Albany, New York. February.

Parsons. 2013c. *Phase 2 Dredging Construction Quality Control/Quality Assurance Plan for 2013*. (Appendix A to 2013 RAWP). Prepared for General Electric Company, Albany, New York. February

Parsons. 2013d. *Phase 2 Remedial Action Health and Safety Plan for 2013 – Hudson River PCBs Superfund Site* (RA HASP). Prepared for General Electric Company, Albany, New York. February.

Quantitative Environmental Analysis, LLC (QEA). 2004. *Data Summary Report for Candidate Phase 1 Areas.* September, 2004.

ATTACHMENT A

WASTE PROFILE INFORMATION
(FOR TSCA REGULATED DEWATERED SEDIMENT AND DEBRIS)

2013 Transportation and Disposal Plan

WASTE PROFILE INFORMATION FOR TSCA-REGULATED DEWATERED SEDIMENTS AND DEBRIS

GENERATOR INFORMATION

Generator GE Hudson River Project

Mailing Address 381 Broadway Building 40-2 City/State Fort Edward, NY Zip 12828

Shipping Address 446 Lock 8 Way City/State Hudson Falls, NY Zip 12839

Primary Contact: Jay Snow TEL: 518.746.5678

Email: jay.snow@ge.com

US EPA IDENTIFICATION NUMBER
NYD980763841

STATE IDENTIFICATION NUMBER
D0036

WASTE CHARACTERIZATION

PCB Solids ☒ Dirt-Soil ☒ Debris (PPE, Rags, Etc.) ☒ Mixed Soil/Debris	☒ Non-Liquid dredged materials containing PCB
Transformer ☐ 50-500 ppm ☐ Above 500 ppm ☐ Full ☐ Drained ☐ Drained and Flushed	Transformer less than or equal to 50 ppm ☐ Full ☐ Drained
PCB Liquids ☐ Below 50 ppm ☐ Above 50 ppm	☒ PCB clean up material from area greater than 50 ppm
☐ Capacitors – Large (over 3 lbs of Liquid or 100 cu. in.) All Large Capacitors Are Incinerated.	☐ Capacitors – Small (less than 3 lbs of Liquid or 100 cu. in.) include ballast ☐ Incineration ☒ Landfill
PCB hydraulic machine ☐ Full ☐ Drained of all free flowing liquids	☐ Articles (regulators, switches, conductors) drained of all free liquid
Articles – Liquids Below 50 ppm ☐ Drain ☐ Landfill	Articles – Liquids ☐ 50-500 ppm ☐ Above 500 ppm ☐ Full ☐ Drained ☐ Drained and Flushed

PHYSICAL PROPERTIES & GENERAL INFORMATION

Generator Regulatory Status				State ID#: D0036		EPA ID#: NYD980763841	
☒ Industrial	☐ Municipal	☐ PST Waste	☐ Universal Waste	☐ SQG	☐ CESQG	☐ Oil & Gas Exempt	☐ Oil & Gas Non-Exempt

1. Process generating this waste: CERCLA Remedial Action

2013 Transportation and Disposal Plan

2. Does this material contain radioactive, pyrophoric, shock sensitive or explosive materials? ☐ Yes ☒ No

3. Are any of the materials RCRA regulated? ☐ Yes ☒ No Note: If yes, please submit a RCRA WPQ.

4. Flash Point: 1. ☐ <100°F 2. ☐ 101-140°F 3. ☐ 141-200°F 4. ☒ >200°F Comments: Non-flammable

5. Does this waste pass the EPA-specified Paint Filter Test? ☒ Yes ☐ No Comments: _____

6. Has material been solidified/stabilized: ☐ Yes ☒ No If yes, list additives: _____

SHIPPING AND HANDLING INFORMATION

PCB MATERIALS MUST BE PACKAGED AND SHIPPED IN ACCORDANCE WITH D.O.T. REGULATIONS AS SPECIFIED IN 49 CFR 100-177, AND ALSO PACKAGED IN ACCORDANCE WITH EPA REGULATIONS AS SPECIFIED IN 40 CFR PART 761.

1. D.O.T. Hazardous Material? ☒ Yes ☐ No2. D.O.T. RQ Required: ☒ Yes ☐ No ☐ N/A

3. Proper D.O.T. Shipping Name: RQ, Polychlorinated Biphenyls, solid, mixture

4. D.O.T. Hazard Class: 9

5. D.O.T. ID Number: UN3432. D.O.T. Packing Group: III

7. Additional D.O.T. Description(s): _____

8. Type of Container: ☐ Drum ☐ Bulk Truck

   Other (specify): Standard Rail Gondola with waste-enveloping liner (packaging)

9. Projected Volume: ≤ TBD Tons; _____ Gallons; _____ Cubic Yards; _____ Drum(s); _____ Other (_____)

   Per: ☐ One Time ☐ Week ☐ Month ☐ Quarter ☒ Year

10. Comments/Special Handling: Projected quantity is approximate for 2013.

ATTACHMENT B

WASTE PROFILE INFORMATION
(FOR NON-TSCA DEWATERED SEDIMENT)

2013 Transportation and Disposal Plan

WASTE PROFILE INFORMATION FOR NON-TSCA DEWATERED SEDIMENTS

GENERATOR INFORMATION

Generator GE Hudson River Project

Mailing Address 381 Broadway Building 40-2 City/State Fort Edward, NY Zip 12828

Shipping Address 446 Lock 8 Way City/State Hudson Falls, NY Zip 12839

Primary Contact: Jay Snow TEL: 518.746.5678

Email: jay.snow@ge.com

US EPA IDENTIFICATION NUMBER
NYD980763841

STATE IDENTIFICATION NUMBER
D0036

WASTE CHARACTERIZATION

PCB Solids ☒ Dirt-Soil ☒ Debris (PPE, Rags, Etc.) ☒ Mixed Soil/Debris	☒ Non-Liquid dredged materials containing PCB
Transformer ☐ 50-500 ppm ☐ Above 500 ppm ☐ Full ☐ Drained ☐ Drained and Flushed	Transformer less than or equal to 50 ppm ☐ Full ☐ Drained
PCB Liquids ☐ Below 50 ppm ☐ Above 50 ppm	☐ PCB clean up material from an area greater than 50 ppm
☐ Capacitors – Large (over 3 lbs of Liquid or 100 cu. in.) All Large Capacitors Are Incinerated.	☐ Capacitors – Small (less than 3 lbs of Liquid or 100 cu. in.) include ballast ☐ Incineration ☒ Landfill
PCB hydraulic machine ☐ Full ☐ Drained of all free flowing liquids	☐ Articles (regulators, switches, conductors) drained of all free liquid
Articles – Liquids Below 50 ppm ☐ Drain ☐ Landfill	Articles – Liquids ☐ 50-500 ppm ☐ Above 500 ppm ☐ Full ☐ Drained ☐ Drained and Flushed

Generator Regulatory Status				State ID#: D0036			EPA ID#: NYD980763841
☒ Industrial	☐ Municipal	☐ PST Waste	☐ Universal Waste	☐ SQG	☐ CESQG	☐ Oil & Gas Exempt	☐ Oil & Gas Non-Exempt

2013 Transportation and Disposal Plan

1. Process generating this waste: CERCLA Remedial Action
2. Does this material contain radioactive, pyrophoric, shock sensitive or explosive materials? ☐ Yes ☒ No
3. Are any of the materials RCRA regulated? ☐ Yes ☒ No Note: If yes, please submit a RCRA WPQ.
4. Flash Point: 1. ☐ <100°F 2. ☐ 101-140°F 3. ☐ 141-200°F 4. ☒ >200°F Comments: Non-flammable
5. Does this waste pass the EPA-specified Paint Filter Test? ☒ Yes ☐ No Comments: _____
6. Has material been solidified/stabilized: ☐ Yes ☒ No If yes, list additives: _____

SHIPPING AND HANDLING INFORMATION

MATERIALS MUST BE PACKAGED AND SHIPPED IN ACCORDANCE WITH D.O.T. REGULATIONS AS SPECIFIED IN 49 CFR 100-177

1. D.O.T. Hazardous Material? ☐ Yes ☒ No
2. D.O.T. RQ Required: ☐ Yes ☐ No ☒ N/A
3. Proper D.O.T. Shipping Name: Soil, Chemical Waste, Contaminated, nec, Dry
4. D.O.T. Hazard Class: N/A
5. D.O.T. ID Number: N/A D.O.T. Packing Group: N/A
7. Additional D.O.T. Description(s): Dewatered sediment from CERCLA remediation containing PCB at concentration less that 50 ppm. STCC: 4029101
8. Type of Container: ☐ Drum ☐ Bulk Truck

   Other (specify): Standard Rail Gondola with waste-enveloping liner (packaging)
9. Projected Volume: ≤ TBD Tons; _____ Gallons; _____ Cubic Yards; _____ Drum(s); _____ Other (_____)

   Per: ☐ One Time ☐ Week ☐ Month ☐ Quarter ☒ Year
10. Comments/Special Handling: Projected quantity is approximate for 2013.

ATTACHMENT C

DISPOSAL FACILITY SUMMARIES

DISPOSAL FACILITY SUMMARY

GE Hudson River Phase 2 Year 3

Dewatered TSCA Sediment Disposal

Facility Name	Environmental Quality, Wayne Disposal Inc. Site #2
Physical Address	49350 North I-94 Service Drive Belleville, Michigan 48111 (approximately 30 miles west/southwest of Detroit)
Mailing Address	36255 Michigan Ave. Wayne, Michigan 48184
Telephone	(800) 592-5489
Fax	(800) 595-5329
Permits, Authorized Activities, and Agencies	MID048090633 (RCRA Permit – Hazardous Waste Management Facility Operating License; Waste Disposal Treatment Plant) MI-ROP-M4782-2003a (Michigan Renewable Operating Air Permit) EPA ID# MID048090633 U.S. EPA Region 5 ISO 9001:2008, ISO 14001:2004 and OHSAS 18001:2007 certified.
Storage/Treatment/ Disposal Capabilities	RCRA (hazardous) and TSCA (PCB) wastes as well as solidification and metals fixation for RCRA waste material. RCRA/TSCA Landfill Landfill leachate is treated on-site at a dedicated waste water treatment plant.
Relevant State Shipping & Reporting Requirements	PCB wastes are regulated in Michigan only by the federal government. Thus, EPA's TSCA PCB shipping and reporting rules are the primary requirements.
Other Information	Facility size: 120 acres. A 1,000-ft buffer zone is maintained between the landfill cells and the residential areas.

DISPOSAL FACILITY SUMMARY

GE Hudson River Phase 2 Year 3

Dewatered TSCA Sediment Disposal

Facility Name	Clean Harbors Lone Mountain Landfill
Physical Address	5 Miles East & 1 Mile North of Highway Junction 281 & 412 Waynoka, Oklahoma 73860
Mailing Address	Route 2 Box 170 Waynoka, Oklahoma 73860
Telephone	(580) 697-3500
Fax	(580) 697-3596
Permits, Authorized Activities, and Agencies	RCRA/HSWA Operating Permit No. 3547005 Air Quality Permit No. 96-517-O Oklahoma Department of Environmental Quality (ODEQ) EPA ID# OKD065438376 RCRA Post Closure Permit No.OKD065438376-PC U.S. EPA Region 6
Storage/Treatment/Disposal Capabilities	Rail transfer facility (Avard, OK); PCB management and disposal, on-site wastewater treatment unit for processing landfill leachate and wastewater, secure landfill (Waynoka, OK).
Relevant State Shipping & Reporting Requirements	PCB wastes are regulated in Oklahoma only by the federal government. Thus, EPA's TSCA PCB shipping and reporting rules are the primary requirements.
Other Information	Lone Mountain Facility Size: 3,500 acres (560 acres developed) The nearest residence is 1/4 mile north of the site.

DISPOSAL FACILITY SUMMARY

GE Hudson River Phase 2 Year 3

Dewatered Non-TSCA Sediment Disposal

Facility Name	Tunnel Hill Reclamation Landfill
Physical Address	2500 Township Rd. 205, Rt. 2 New Lexington, Ohio 43764 (60 miles southeast of Columbus)
Mailing Address	P.O. Box 625 New Lexington, Ohio 43764
Telephone	(740) 342-1180
Fax	(740) 342-1331
Permits, Authorized Activities, and Agencies	Solid Waste Facility License – Municipal Solid Waste Landfill Ohio Environmental Protection Agency (OEPA) Licensing Authority – Perry Co MSWL Subtitle D Landfill OEPA CID# 272650 PTI# 06-8443 Permitted to receive waste from CERCLA sites based on an approval received from the EPA on August 6, 2009.
Storage/Treatment/ Disposal Capabilities	The facility accepts a wide range of waste products; from municipal solid waste and construction & demolition debris, to approved special wastes.
Relevant State Shipping & Reporting Requirements	Wastes classified as "specialty wastes" require a waste profile and supporting analytical data that must be submitted in advance. All other wastes do not require any formal reporting requirements.
Other Information	Facility size: 544 acres. Property controlled: 2,731 acres. The landfill was constructed with two protective liners and a leachate collection system, a surface water management system, a ground water monitoring system, explosive gas monitoring system, and a final cap closure system.

ATTACHMENT D

EMPTY RAIL CAR INSPECTION AND RELEASE PROCEDURE

GE Hudson River Sediment Remediation
Empty Rail Car
Inspection and Release Procedure
October 13, 2010

Scope

This procedure applies to inspection, sampling, and release of empty rail cars at the conclusion of waste shipment during Phase 1 of the Hudson River Dredging project. The inspection, sampling, and release procedures described in this document will be performed on rail cars either at the Fort Edward Rail Yard or the landfill(s). Prior to final release of the rail cars from the landfills, the rail cars will be unloaded, cleaned, and certified as visibly clean.

The decontamination procedure used at the landfill is designed to ensure that all visible traces of PCB-contaminated sediment remaining in a gondola rail car after unloading via mechanical excavation have be cleaned by manually shoveling, sweeping, and vacuuming with an industrial strength vacuum. The procedure also provides for careful inspection by an individual that did not take part in the cleaning process to ensure no visible sediment residue remains in the rail cars, and for the completion of decontamination to be certified.

Final cleaning of the railcar will be conducted by scraping and sweeping the interior of the railcars, vacuuming the interior of the railcars and cleaning out foot holes and weep holes. The exterior of the railcar will be inspected and any visible sediment will be swept off and, if necessary, the area washed to remove any staining.

Based upon our experience with the routine railcar cleaning and decontamination procedures in place and rail car wipe testing results to date, no additional decontamination should be necessary. Following completion of the 2009 shipping season, 90 railcars (20 percent of the project fleet) were wipe tested. All wipe test results were non-detect for PCBs. The landfill that received shipments in 2009 also conducted rail car wipe testing with comparable results for PCBs. Prior to releasing railcars from the Hudson River Project in 2010, the same inspection and cleaning procedure will be implemented. Because the inspection and cleaning procedures have been verified to be effective, no additional wipe testing will be required. The inspection will be conducted prior to release of the railcars from the Project, either at the landfill or at the Fort Edward Rail Yard depending on where the rail cars are to be released from the Project.

This inspection and release procedure is specific to the requirement of the GE Hudson River Project and the Project's gondola rail car fleet provided by the rail car lessor.

The inspection will review the following aspects for each rail car:

- Removal of all placards and labels
- Physical or mechanical damage (interior or exterior)
- Condition of weep holes
- Presence of visible dredge sediment residue (interior or exterior)
- Any railcars found to contain visible sediment will be re-cleaned.

This inspection will be performed as a pre-release inspection for cars ready to be released from the Project following unloading of shipments at the landfills. The individual conducting the inspection will complete the inspection report, copy attached, for each railcar inspected and sign the report indicating each railcar meets the release requirements. CM personnel will audit the rail car inspection and sampling activities, as required.

Inspection Procedure

- Inspections will be performed by the railcar lessor personnel.
- Detailed visual inspection will be performed on the interior of each rail car, including inspection of the foot holes.
- The exterior of each car will be inspected for dredge materials. Particular attention will be paid to the knuckle and draw bar, cross over boards and supports, sill and end plates.
- All weep holes will be inspected from the outside to ensure that they are not plugged or otherwise blocked.
- Obvious dredge material in the interior of the cars, other than the normal staining and rust will be noted for removal.
- Removal of all placards and labels will be verified.

GE Hudson River Sediment Remediation
Empty Gondola Rail Car
Inspection and Release Form

DATE _____

Car Number _____

Inspection of the following:

All placards and labels removed
Physical or Mechanical damage (interior or exterior)
Any visible sediment (interior or exterior)
Weep holes open and free of debris
Foot holes clean and free of material

The car meets the Release requirements unless otherwise noted.

Placards/Labels Removed _____

Weep Holes clear and free of materials _____

Interior Visually Clean _____

Foot Holes inspected and clean _____

Exterior Visually Clean _____

Mechanical Inspection _____

Comments:

_____
_____
_____
_____
_____
_____

Signature: _____

ATTACHMENT E

TSCA WASTE MANIFEST FORM AND INSTRUCTIONS

2013 Transportation and Disposal Plan

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number | 2. Page 1 of | 3. Emergency Response Phone | **4. Manifest Tracking Number**

GENERATOR

5. Generator's Name and Mailing Address | Generator's Site Address (if different than mailing address)

Generator's Phone:

6. Transporter 1 Company Name | U.S. EPA ID Number

7. Transporter 2 Company Name | U.S. EPA ID Number

8. Designated Facility Name and Site Address | U.S. EPA ID Number

Facility's Phone:

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1.					
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name | Signature | Month | Day | Year

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:

Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name | Signature | Month | Day | Year

Transporter 2 Printed/Typed Name | Signature | Month | Day | Year

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) | U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) | Month | Day | Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1. | 2. | 3. | 4.

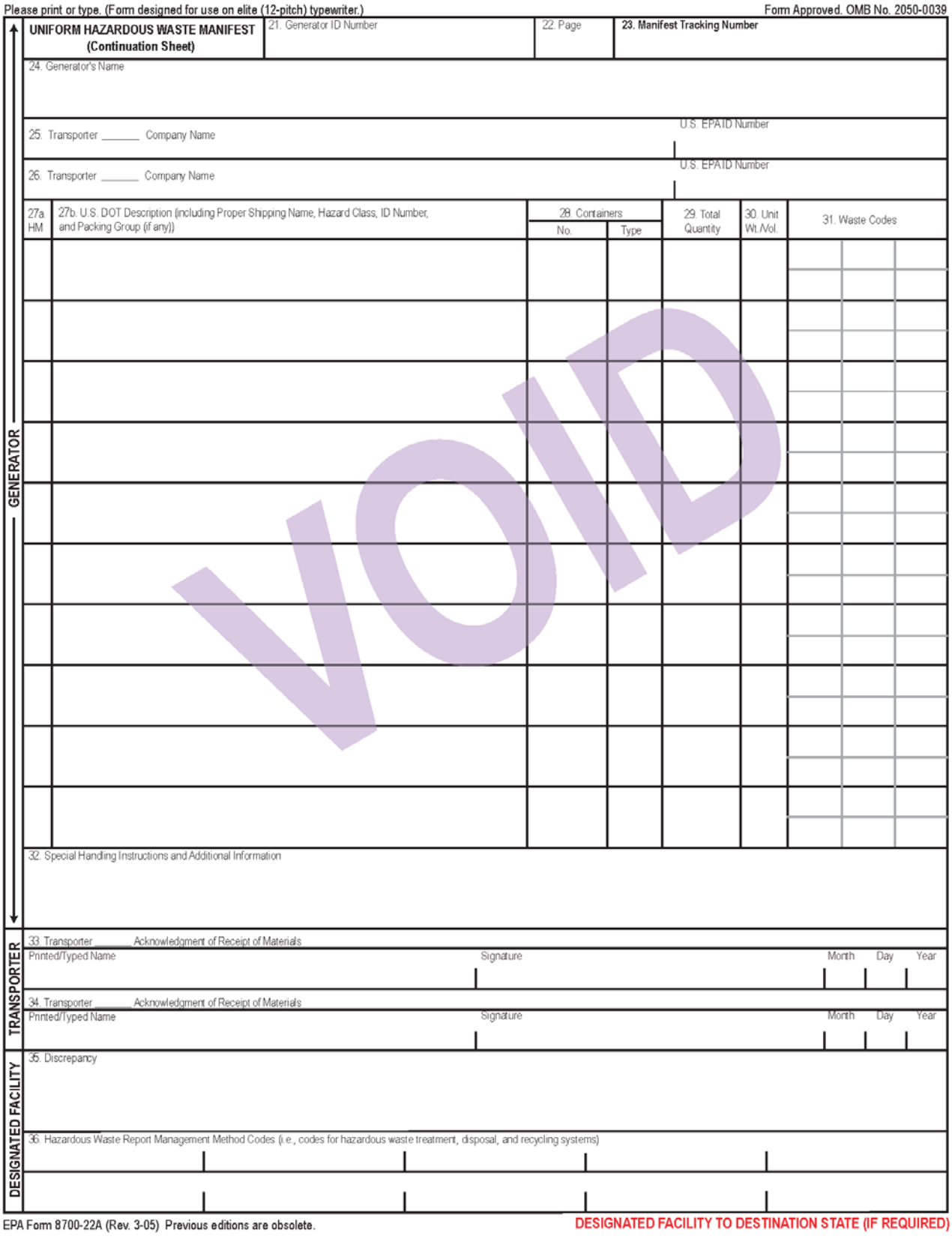
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name | Signature | Month | Day | Year

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

2013 Transportation and Disposal Plan



Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)

21. Generator ID Number | 22. Page | **23. Manifest Tracking Number**

24. Generator's Name

25. Transporter _____ Company Name — U.S. EPA ID Number

26. Transporter _____ Company Name — U.S. EPA ID Number

27a. HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers No.	28. Containers Type	29. Total Quantity	30. Unit Wt./Vol.	31. Waste Codes

VOID

32. Special Handling Instructions and Additional Information

GENERATOR

TRANSPORTER

33. Transporter _____ Acknowledgment of Receipt of Materials
Printed/Typed Name | Signature | Month | Day | Year

34. Transporter _____ Acknowledgment of Receipt of Materials
Printed/Typed Name | Signature | Month | Day | Year

DESIGNATED FACILITY

35. Discrepancy

36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

EPA Form 8700-22A (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Instructions for Completing the Hazardous Waste Manifest

What are the instructions for completing the manifest form (EPA Form 8700-22)?

Read all instructions before completing the form.

1. The form has been designed for use on a 12-pitch (elite) typewriter which is also compatible with standard computer printers; a firm point pen may also be used—press down hard.

2. Federal regulations require generators and transporters of hazardous waste and owners or operators of hazardous waste treatment, storage, and disposal facilities to complete the manifest form (EPA Form 8700–22) and, if necessary, the continuation sheet (EPA Form 8700–22A) for both inter- and intrastate transportation of hazardous waste.

I. Instructions for Generators

Item 1. Generator's U.S. EPA Identification Number

Enter the generator's U.S. EPA twelve-digit identification number, or the state generator identification number if the generator site does not have an EPA identification number.

Item 2. Page 1 of ___

Enter the total number of pages used to complete the manifest (*i.e.*, the first page (EPA Form 8700-22) plus the number of continuation sheets (EPA Form 8700-22A), if any).

Item 3. Emergency Response Phone Number

Enter a phone number for which emergency response information can be obtained in the event of an incident during transportation. The emergency response phone number must:

1. Be the number of the generator or the number of an agency or organization who is capable of and accepts responsibility for providing detailed information about the shipment;

2. Reach a phone that is monitored 24 hours a day at all times the waste is in transportation (including transportation related storage); and

3. Reach someone who is either knowledgeable of the hazardous waste being shipped and has comprehensive emergency response and spill cleanup/incident mitigation information for the material being shipped or has immediate access to a person who has that knowledge and information about the shipment.

Note: Emergency Response phone number information should only be entered in Item 3 when there is one phone number that applies to all the waste materials described in Item 9b. If a situation (*e.g.*, consolidated shipments) arises where more than one Emergency Response phone number applies to the various wastes listed on the manifest, the phone numbers associated with each specific material should be entered after its description in Item 9b.

Item 4. Manifest Tracking Number

This unique tracking number must be pre-printed on the manifest by the forms printer.

Item 5. Generator's Mailing Address, Phone Number and Site Address

Enter the name of the generator, the mailing address to which the completed manifest signed by the designated facility should be mailed, and the generator's telephone number. Note, the telephone number (including area code) should be the normal business number for the generator, or the number where the generator or his authorized agent may be reached to provide instructions in the event the designated and/or alternate (if any) facility rejects some or all of the shipment. Also enter the physical site address from which the shipment originates only if this address is different than the mailing address.

Item 6. Transporter 1 Company Name, and U.S. EPA ID Number

Enter the company name and U.S. EPA ID number of the first transporter who will transport the waste. Vehicle or driver information may not be entered here.

Item 7. Transporter 2 Company Name and U.S. EPA ID Number

If applicable, enter the company name and U.S. EPA ID number of the second transporter who will transport the waste. Vehicle or driver information may not be entered here.

If more than two transporters are needed, use a continuation sheet(s) (EPA Form 8700-22A).

Item 8. Designated Facility Name, Site Address, and U.S. EPA ID Number

Enter the company name and site address of the facility designated to receive the waste listed on the manifest. Also enter the facility's phone number and the U.S. EPA twelve-digit identification number of the facility.

Item 9. U.S. DOT Description (Including Proper Shipping Name, Hazard Class or Division, Identification Number, and Packing Group)

Item 9a. If the wastes identified in Item 9b consist of both hazardous and nonhazardous materials, then identify the hazardous materials by entering an "X" in this Item next to the corresponding hazardous material identified in Item 9b.

Item 9b. Enter the U.S. DOT Proper Shipping Name, Hazard Class or Division,

Identification Number (UN/NA) and Packing Group for each waste as identified in 49 CFR 172. Include technical name(s) and reportable quantity references, if applicable.

Note: If additional space is needed for waste descriptions, enter these additional descriptions in Item 27 on the continuation sheet (EPA Form 8700-22A). Also, if more than one Emergency Response phone number applies to the various wastes described in either Item 9b or Item 27, enter applicable Emergency Response phone numbers immediately following the shipping descriptions for those Items.

Item 10. Containers (Number and Type)

Enter the number of containers for each waste and the appropriate abbreviation from Table I (below) for the type of container.

Table I - Types of Containers

BA = Burlap, cloth, paper, or plastic bags.	DT = Dump truck.
CF = Fiber or plastic boxes, cartons, cases.	DW = Wooden drums, barrels, kegs.
CM = Metal boxes, cartons, cases (including roll-offs).	HG = Hopper or gondola cars.
CW = Wooden boxes, cartons, cases.	TC = Tank cars.
CY = Cylinders.	TP = Portable tanks
DF = Fiberboard or plastic drums, barrels, kegs.	TT = Cargo tanks (tank trucks).
DM = Metal drums, barrels, kegs.	

Item 11. Total Quantity

Enter, in designated boxes, the total quantity of waste. Round partial units to the nearest whole unit, and do not enter decimals or fractions. To the extent practical, report quantities using appropriate units of measure that will allow you to report quantities with precision. Waste quantities entered should be based on actual measurements or reasonably accurate estimates of actual quantities shipped. Container capacities are not acceptable as estimates.

Item 12. Units of Measure (Weight/Volume)

Enter, in designated boxes, the appropriate abbreviation from Table II (below) for the unit of measure.

Table II - Units of Measure

G = Gallons (liquids only)	N = Cubic Meters
K = Kilograms	P = Pounds
L = Liters (liquids only)	T = Tons (2000 Pounds)
M = Metric Tons (1000 Kilograms)	Y = Cubic Yards

Note: Tons, Metric Tons, Cubic Meters, and Cubic Yards should only be reported in connection with very large bulk shipments, such as rail cars, tank trucks, or barges.

Item 13. Waste Codes

Enter up to six federal and state waste codes to describe each waste stream identified in Item 9b. State waste codes that are not redundant with federal codes must be entered here, in addition to the federal waste codes which are most representative of the properties of the waste.

Item 14. Special Handling Instructions and Additional Information

1. Generators may enter any special handling or shipment-specific information necessary for the proper management or tracking of the materials under the generator's or other handler's business processes, such as waste profile numbers, container codes, bar codes, or response guide numbers. Generators also may use this space to enter additional descriptive information about their shipped materials, such as chemical names, constituent percentages, physical state, or specific gravity of wastes identified with volume units in Item 12.

2. This space may be used to record limited types of federally required information for which there is no specific space provided on the manifest, including any alternate facility designations; the manifest tracking number of the original manifest for rejected wastes and residues that are re-shipped under a second manifest; and the specification of PCB waste descriptions and PCB out-of-service dates required under 40 CFR 761.207. Generators, however, cannot be required to enter information in this space to meet state regulatory requirements.

Item 15. Generator's/Offeror's Certifications

1. The generator must read, sign, and date the waste minimization certification statement. In signing the waste minimization certification statement, those generators who have not been exempted by statute or regulation from the duty to make a waste minimization certification under section 3002(b) of RCRA are also certifying that they have complied with the waste minimization requirements. The Generator's Certification also contains the required attestation that the shipment has been properly prepared and is in proper condition for transportation (the shipper's certification). The content of the shipper's certification statement is as follows: "I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked, and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent." When a party other than the generator prepares the shipment for transportation, this party may also sign the shipper's certification statement as the offeror of the shipment.

2. Generator or Offeror personnel may preprint the words, ''On behalf of'' in the signature block or may hand write this statement in the signature block prior to signing the generator/offeror certification, to indicate that the individual signs as the employee or agent of the named principal.

Note: All of the above information except the handwritten signature required in Item 15 may be pre-printed.

II. Instructions for International Shipment Block

Item 16. International Shipments

For export shipments, the primary exporter must check the export box, and enter the point of exit (city and state) from the United States. For import shipments, the importer must check the import box and enter the point of entry (city and state) into the United States. For exports, the transporter must sign and date the manifest to indicate the day the shipment left the United States. Transporters of hazardous waste shipments must deliver a copy of the manifest to the U.S. Customs when exporting the waste across U.S. borders.

III. Instructions for Transporters

Item 17. Transporters' Acknowledgments of Receipt

Enter the name of the person accepting the waste on behalf of the first transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt. Only one signature per transportation company is required. Signatures are not required to track the movement of wastes in and out of transfer facilities, unless there is a change of custody between transporters.

If applicable, enter the name of the person accepting the waste on behalf of the second transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Note: Transporters carrying imports, who are acting as importers, may have responsibilities to enter information in the International Shipments Block. Transporters carrying exports may also have responsibilities to enter information in the International Shipments Block. See above instructions for Item 16.

IV. Instructions for Owners and Operators of Treatment, Storage, and Disposal Facilities

Item 18. Discrepancy

Item 18a. Discrepancy Indication Space

1. The authorized representative of the designated (or alternate) facility's owner or operator must note in this space any discrepancies between the waste described on the manifest and the waste actually received at the facility. Manifest discrepancies are: significant differences (as defined by §§ 264.72(b) and 265.72(b)) between the quantity or type of hazardous waste designated on the manifest or shipping paper, and the quantity and type of hazardous waste a facility actually receives, rejected wastes, which may be a full or partial shipment of hazardous waste that the TSDF cannot accept, or container residues, which are residues that exceed the quantity limits for "empty" containers set forth in 40 CFR 261.7(b).

2. For rejected loads and residues (40 CFR 264.72(d), (e), and (f), or 40 CFR 265.72(d), (e), or (f)), check the appropriate box if the shipment is a rejected load (*i.e.*, rejected by the designated and/or alternate facility and is sent to an alternate facility or returned to the generator) or a regulated residue that cannot be removed from a container. Enter the reason for the rejection or the inability to remove the residue and a description of the waste. Also, reference the manifest tracking number for any additional manifests being used to track the rejected waste or residue shipment on the original manifest. Indicate the original manifest tracking number in Item 14, the Special Handling Block and Additional Information Block of the additional manifests.

3. Owners or operators of facilities located in unauthorized states (*i.e.*, states in which the U.S. EPA administers the hazardous waste management program) who cannot resolve significant differences in quantity or type within 15 days of receiving the waste must submit to their Regional Administrator a letter with a copy of the manifest at issue describing the discrepancy and attempts to reconcile it (40 CFR 264.72(c) and 265.72(c)).

4. Owners or operators of facilities located in authorized states (*i.e.*, those states that have received authorization from the U.S. EPA to administer the hazardous waste management program) should contact their state agency for information on where to report discrepancies involving "significant differences" to state officials.

Item 18b. Alternate Facility (or Generator) for Receipt of Full Load Rejections

Enter the name, address, phone number, and EPA Identification Number of the Alternate Facility which the rejecting TSDF has designated, after consulting with the generator, to receive a fully rejected waste shipment. In the event that a fully rejected shipment is being returned to the generator, the rejecting TSDF may enter the generator's site information in this space. This field is not to be used to forward partially rejected loads or residue waste shipments.

Item 18c. Alternate Facility (or Generator) Signature

The authorized representative of the alternate facility (or the generator in the event of a returned shipment) must sign and date this field of the form to acknowledge receipt of the fully rejected wastes or residues identified by the initial TSDF.

Item 19. Hazardous Waste Report Management Method Codes

Enter the most appropriate Hazardous Waste Report Management Method code for each waste listed in Item 9. The Hazardous Waste Report Management Method code is to be entered by the first treatment, storage, or disposal facility (TSDF) that receives the waste and is the code that best describes the way in which the waste is to be managed when received by the TSDF.

Item 20. Designated Facility Owner or Operator Certification of Receipt (Except As Noted in Item 18a)

Enter the name of the person receiving the waste on behalf of the owner or operator of the facility. That person must acknowledge receipt or rejection of the waste described on the manifest by signing and entering the date of receipt or rejection where indicated. Since the Facility Certification acknowledges receipt of the waste except as noted in the Discrepancy Space in Item 18a, the certification should be signed for both waste receipt and waste rejection, with the rejection being noted and described in the space provided in Item 18a. Fully rejected wastes may be forwarded or returned using Item 18b after consultation with the generator. Enter the name of the person accepting the waste on behalf of the owner or operator of the alternate facility or the original generator. That person must acknowledge receipt or rejection of the waste

described
on the manifest by signing and entering the date they received or rejected the waste in Item 18c. Partially rejected wastes and residues must be re-shipped under a new manifest, to be initiated and signed by the rejecting TSDF as offeror of the shipment.

What are the instructions for completing the continuation sheet (EPA Form 8700-22A)?

Read all instructions before completing the form.

The form has been designed for use on a 12-pitch (elite) typewriter; a firm point pen may also be used—press down hard.

The form must be used as a continuation sheet to U.S. EPA Form 8700-22 if:

- More than two transporters are to be used to transport the waste; or
- More space is required for the U.S. DOT descriptions and related information in Item 9 of U.S. EPA Form 8700-22.

Federal regulations require generators and transporters of hazardous waste and owners or operators of hazardous waste treatment, storage, or disposal facilities to use the uniform hazardous waste manifest (EPA Form 8700-22) and, if necessary, the continuation sheet (EPA Form 8700-22A) for both interstate and intrastate transportation.

I. Generators

Item 21. Generator's ID Number

Enter the generator's U.S. EPA twelve-digit identification number or, the state generator identification number if the generator site does not have an EPA identification number.

Item 22. Page ___

Enter the page number of the continuation sheet.

Item 23. Manifest Tracking Number

Enter the Manifest Tracking Number from Item 4 of the manifest form to which the continuation sheet is attached.

Item 24. Generator's Name—

Enter the generator's name as it appears in Item 5 on the first page of the manifest.

Item 25. Transporter—Company Name

If additional transporters are used to transport the waste described on the manifest, enter the company name of each additional transporter in the order in which they will transport the waste. Enter after the word "Transporter" the order of the transporter. For example, Transporter 3 Company Name. Also enter the U.S. EPA twelve-digit identification number of the transporter described in Item 25.

Item 26. Transporter—Company Name

If additional transporters are used to transport the waste described on the manifest, enter the company name of each additional transporter in the order in which they will transport the waste. Enter after the word "Transporter" the order of the transporter. For example, Transporter 4 Company Name. Each continuation sheet can record the names of two additional transporters. Also enter the U.S. EPA twelve-digit identification number of the transporter named in Item 26.

Item 27. U.S. D.O.T. Description Including Proper Shipping Name, Hazardous Class, and ID Number (UN/NA)

For each row enter a sequential number under Item 27b that corresponds to the order of waste codes from one continuation sheet to the next, to reflect the total number of wastes being shipped. Refer to instructions for Item 9 of the manifest for the information to be entered.

Item 28. Containers (No. And Type)

Refer to the instructions for Item 10 of the manifest for information to be entered.

Item 29. Total Quantity

Refer to the instructions for Item 11 of the manifest form.

Item 30. Units of Measure (Weight/Volume)

Refer to the instructions for Item 12 of the manifest form.

Item 31. Waste Codes

Refer to the instructions for Item 13 of the manifest form.

Item 32. Special Handling Instructions and Additional Information

Refer to the instructions for Item 14 of the manifest form.

II. Transporters

Item 33. Transporter—Acknowledgment of Receipt of Materials

Enter the same number of the Transporter as identified in Item 25. Enter also the name of the person accepting the waste on behalf of the Transporter (Company Name) identified in Item 25. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 34. Transporter—Acknowledgment of Receipt of Materials

Enter the same number of the Transporter as identified in Item 26. Enter also the name of the person accepting the waste on behalf of the Transporter (Company Name) identified in Item 26. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

III. Owner and Operators of Treatment, Storage, or Disposal Facilities

Item 35. Discrepancy Indication Space

Refer to Item 18. This space may be used to more fully describe information on discrepancies identified in Item 18a of the manifest form.

Item 36. Hazardous Waste Report Management Method Codes

For each field in Item 36, enter the sequential number that corresponds to the waste materials described under Item 27, and enter the appropriate process code that describes how the materials will be processed when received. If additional continuation sheets are attached, continue numbering the waste materials and process code fields sequentially, and enter on each sheet the process codes corresponding to the waste materials identified on that sheet.

What is the public reporting burden associated with the manifest?

Public reporting burden for this collection of information is estimated to average: 30 minutes for generators, 10 minutes for transporters, and 25 minutes for owners or operators of treatment, storage, and disposal facilities. This includes time for reviewing instructions, gathering data, completing, reviewing and transmitting the form. Any correspondence regarding the Paperwork Reduction Act burden statement for the manifest must be sent to the Director of the Collection Strategies Division in EPA's Office of Information Collection at the following address: U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW., Washington, DC 20460. Do not send the completed form to this address.

ATTACHMENT F

NON-HAZARDOUS WASTE MANIFEST FORM

NON-HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Waste Tracking Number

GENERATOR

5. Generator's Name and Mailing Address

Generator's Site Address (if different than mailing address)

Generator's Phone:

6. Transporter 1 Company Name — U.S. EPA ID Number

7. Transporter 2 Company Name — U.S. EPA ID Number

8. Designated Facility Name and Site Address — U.S. EPA ID Number

Facility's Phone:

	9. Waste Shipping Name and Description	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	
	1.					
	2.					
	3.					
	4.					

13. Special Handling Instructions and Additional Information

14. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.

Generator's/Offeror's Printed/Typed Name — Signature — Month Day Year

INT'L

15. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:

Transporter Signature (for exports only): Date leaving U.S.:

TRANSPORTER

16. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name — Signature — Month Day Year

Transporter 2 Printed/Typed Name — Signature — Month Day Year

DESIGNATED FACILITY

17. Discrepancy

17a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

17b. Alternate Facility (or Generator) — U.S. EPA ID Number

Facility's Phone:

17c. Signature of Alternate Facility (or Generator) — Month Day Year

18. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 17a

Printed/Typed Name — Signature — Month Day Year

169-BLC-O 5 11977 (Rev. 9/09)

DESIGNATED FACILITY TO GENERATOR