PHASE 2 TRANSPORTATION AND DISPOSAL PLAN for 2011

Appendix C

to

Remedial Action Work Plan for Phase 2 Dredging and Facility Operations in 2011

HUDSON RIVER PCBs SUPERFUND SITE

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TABLE OF CONTENTS

TABLE OF CONTENTS
(CONTINUED)

Page

LIST OF TABLES

LIST OF FIGURES

TABLE OF CONTENTS
(CONTINUED)

LIST OF ATTACHMENTS

ACRONYMS AND ABBREVIATIONS

ARARs	Applicable or relevant and appropriate requirements
BLM	Bureau of Land Management
CD	Consent Decree
CFR	Code of Federal Regulations
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (Superfund)
CM	Construction Manager
CPR	Delaware & Hudson Railway Company d/b/a Canadian Pacific Railway
cy	cubic yards
DOT	U. S. Department of Transportation
EDI	Electronic Data Interchange
EPA	United States Environmental Protection Agency
EZ	Exclusion Zone
Facility O&M Plan	Facility Operations and Maintenance Plan
GE	General Electric Company
HASP	Health and Safety Plan
IDEQ	Idaho Department of Environmental Quality
MDEQ	Michigan Department of Environmental Quality
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
RA HASP	Remedial Action Health and Safety Plan

ACRONYMS AND ABBREVIATIONS (CONTINUED)

RAWP	Remedial Action Work Plan
RCRA	Resource Conservation and Recovery Act
ROD	Record of Decision
RYOC	Rail Yard Operations Contractor
SOW	Statement of Work
SPCC	spill prevention control and countermeasures
SWPPP	Storm Water Pollution Prevention Plan
TCLP	Toxicity Characteristic Leaching Procedure
TDP	Transportation and Disposal Plan
TSCA	Toxic Substances Control Act
UDEQ	Utah Department of Environmental Quality
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. EPA issued its decision regarding the Performance Standards and scope of Phase 2 in December 2010; and GE has 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.

This *Phase 2 Transportation and Disposal Plan for 2011* (2011 TDP) has been developed in accordance with the revised SOW. This 2011 TDP is an appendix to and part of the *Remedial Action Work Plan for Phase 2 Dredging and Facility Operations in 2011* (2011 RAWP; Parsons 2011). The 2011 TDP describes the procedures to be followed in transporting the sediments and debris removed from the Upper Hudson River during the 2011 season of Phase 2 of the RA, following dewatering, from the selected processing facility to the selected final disposal facility(ies).

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 remaining dewatered sediments and debris will be transported from the processing facility site, via a combination of rail carriers, to the disposal site(s) selected by GE. This 2011 TDP addresses the transport and disposal of the dewatered sediments beginning at the processing facility site and ending at the disposal facilities. Specifically, it addresses 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.

The on-site activities described herein at the processing facility site include the loading of 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 2011* (2011 Facility O&M Plan; Parsons, 2011a), which is Appendix B to the 2011 RAWP.

1.1 PLAN ORGANIZATION

This 2011 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 – Characteristics of Waste/Material to be Transported: describes the characteristics of the dewatered sediments and debris.

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 and the general rail routing.

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 2011 TDP where those requirements are addressed.

Table 1-1 Consent Decree SOW / 2011 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 2011 TDP will apply to transport and disposal of sediments dredged during the 2011 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 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: (a) 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); (b) 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"; (c) the U.S. Department of Transportation (DOT) regulations

relating to the transportation by railroad of hazardous materials (49 CFR Parts 171-174); (d) 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); (e) 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 2011 (further described in Section 3).

Since all sediments dredged in 2011 will be transported to disposal facilities, which are authorized to dispose of TSCA-regulated PCB waste, it will be assumed that all dredged sediments contain PCB $\geq$ 50 ppm and are subject to the TSCA regulations. On the other hand, 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 will be considered to constitute such hazardous waste under the NYSDEC regulations, based on an assumed PCB concentration $\geq$ 50 ppm (but not on any other basis). By contrast, the hazardous waste regulations of states where selected disposal facilities are located do not define materials containing PCBs $\geq$ 50 ppm as a hazardous waste. Thus, at the point of disposal, based on existing sediment characterization data, the dredged sediments will not constitute a hazardous waste under either federal or state regulations. Accordingly, it is anticipated that they will be disposed of at the disposal facility as non-hazardous industrial wastes.

SECTION 2

CHARACTERISTICS OF WASTE/MATERIAL TO BE TRANSPORTED

This section describes the characteristics of the dewatered sediments produced at the processing facility site that will be transported for disposal.

2.1 WASTE STREAM CATEGORIES AND CHARACTERISTICS

The dredged material will be processed by physical separation into three categories. This separation is to support various subsequent steps of further processing and dewatering. The dredged material is generally composed of the following three categories:

- Debris – dredged material that is either too large to place into the trommel or be separated by the trommel. 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, wood, rock, and metal materials, waste packaging and handling materials, etc. Oversized debris is generally reduced in size at the debris staging area as necessary to facilitate handling and to meet disposal facility requirements.
- Coarse material – generally sand and gravel material smaller than debris and amenable to gravity dewatering.
- Fine material – fine sand, silts and clays requiring mechanical dewatering to produce filter cake.

Each of these categories of material contains PCBs and will be managed accordingly. As detailed in Section 4 of the RAWP document, the total quantity of *in situ* sediment targeted for removal from the river during 2011 is approximately 275,000 cy. When volumes associated with over cuts and additional dredge passes are included, this volume may approach 350,000 cy, although the actual volume may be larger or smaller depending on circumstances encountered in the field. A total in situ volume of 350,000 cy is estimated to constitute approximately 400,000 tons of dewatered material requiring transportation and disposal.

The processing of the sediment is limited to physical/chemical dewatering. Thus, the characteristics of the dewatered sediment conform to the characteristics of dredged sediment, except for the reduction in water content and addition of flocculation agents. The flocculation agents are polymers used to promote settlement of the fine-grained materials. The PCB content does not change as a result of the processing activities.

Dredged sediment has been characterized prior to dredging based on investigations conducted in support of the Phase 2 design for 2011 and Phase 1 experience. The key

characteristics applicable to transportation and disposal are summarized in Table 2-1 below. Generally, debris and coarse material will exhibit lower PCB concentrations (toward the lower end of the range indicated).

Table 2-1 Sediment Characteristics (*in situ* measurements)

Parameter	Low	High
PCB concentration (mg/kg)	Non-detect	18,100
% Solids (dewatered)	55.0	86.0
% Fines (<0.074 mm; No. 200)	4.8	80.7
Bulk Density (ton/cy, approximate)	1.14	1.76

2.2 WASTE CHARACTERIZATION

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 to EPA and NYSDEC. Determination of waste characteristics may be based on waste analysis, knowledge of the waste generating process, or both.

Based on analytical data from sampling of the sediments prior to dredging, the chemical characteristics of the sediments are well established. These data, together with the fact that in 2011 sediments will be transported to disposal facilities authorized to dispose of PCB-containing materials, will simplify the waste characterization process. As previously described, in 2011 GE will assume that all dredged sediments contain PCBs at or above 50 ppm. Further, based on existing analytical data, those sediments will not be classified as a hazardous waste under RCRA criteria.

The liquid content of the dewatered sediments is monitored and controlled prior to transport. EPA's TSCA regulations do not allow the disposal of liquid waste with PCBs $\geq$ 50 ppm in a chemical waste landfill (with certain exceptions for PCB liquids $\geq$ 50 ppm and < 500 ppm). In this situation, to preclude the possibility of disposing of sediment containing free liquid in a chemical waste landfill, the dewatered sediment will be monitored by the PFOC for the presence of free liquid as needed 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. The goal of the mechanical dewatering process for fine-grained sediments is solids content of 55% or greater as necessary to enable the resulting "filter cake" material to meet the paint filter test. Although solids content varies among dewatered sediment categories, all three 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 2.8 of the 2011 Facility O&M Plan. If waste is found 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 in accordance with its RCRA/TSCA permit.

Based on the above information, GE has characterized the dewatered sediments for transport. Information for waste profiles for dewatered sediment material is presented for information purposes in Attachment A. Waste profiles will be prepared in the form required by the selected disposal facility, maintained by the Construction Manager (CM), and revised as necessary.

SECTION 3

WASTE DESTINATIONS

Consistent with the selected alternative of handling all project materials as PCB-containing material, GE will select one or more commercial disposal facilities authorized to manage PCB wastes for disposal of dewatered sediment from the 2011 dredging activities. Each of these facilities will hold currently effective permits 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. A summary description of each disposal facility selected by GE to receive dewatered sediment is provided in Attachment B. That attachment provides key information on each facility, including name and location, applicable waste management methods, and relevant permits. The 2011 dredged and processed 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 B, GE will issue an updated Attachment B to EPA. In addition, prior to commencing waste shipments to a disposal facility, GE will:

- Notify receiving state regulators of impending shipments in accordance with CD Paragraph 23.a; and
- Obtain EPA clearance for new disposal facilities in accordance with CD Paragraph 23.c.

SECTION 4

TRANSPORTATION

All of the dewatered sediments and debris produced during the 2011 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 B. As stated in Section 5.1 of the *Phase 2 Performance Standards Compliance Plan for 2011*, all materials dredged in 2011 will be processed 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 facility(ies), 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 by supplier to GE. It is anticipated that up to six train sets, with additional cars reserved as spares, will generally be utilized, depending on the disposal location(s). The railroads will provide locomotive power for the unit trains.

Dewatered sediments and debris 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 a liner system or "packaging" pursuant to the applicable DOT regulatory requirements in 49 CFR 173.240 for "sift-proof packaging." The rail car loading 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. 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 two to three 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 a confidential railroad transportation agreement 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 agreement 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 sediments and 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 three categories of material described above: debris, coarse material, and fine material (filter cake). 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

Prior to the initiation of work on a scheduled shipping day, the RYOC will place a block of approximately 40 or 41 rail cars on the loading track, for loading by the PFOC.

Transport of dewatered sediment and debris will begin upon removal from staging areas for loading into rail cars. From the staging areas, the debris and coarse materials will be loaded into 52-foot mill gondola rail cars via front-end loaders or similar means. Front-end loaders will also work the stockpiles of filter cake and convey that material to rail cars positioned along the loading platform.

5.1.1 Packaging, Rail Car Preparation, and Loading

Dewatered sediments and debris will be packaged in accordance with applicable DOT standards. Packaging will be accomplished by the PFOC using a Type 2 waste-enveloping rail car liner (Type 2 Liner as Liner and Cover) fitted to an open-top gondola rail car with open weep holes.

Woven and/or coated polypropylene fabric (or equivalent) meeting DOT performance standards for such packaging will be used. Type 2 waste-enveloping liners completely cover the material, thus isolating it from the rail car and weather exposure. The Type 2 liner is made of heavier material than a Type 1 liner, so as to withstand direct exposure during transport, thus eliminating the need for a lid or tarpaulin rail-car cover. A more detailed description of the approach is provided below. The packaging will be marked as containing PCBs in accordance with EPA's TSCA regulations (40 CFR Part 761, Subpart C): PCB ML labels will be affixed to the Type 2 liner after closure in two locations so as to be readily visible. The 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.

Using Type 2 Liner as both liner and cover involves the use of a gondola rail car fitted with a Type 2 waste-enveloping liner. 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 residual materials and/or water from previous shipments, if any, the PFOC will carefully install into each rail car that is to be loaded an MHF SLW5310 – "Super Load Wrapper" (or approved equivalent) by first placing it into the rail car with a lull loader. The liner will then be unrolled 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, coarse debris and or filter cake.

Wheel loaders, Komatsu WA500 4-wheel front-end loaders with 7.5 cy buckets equipped with Loadrite Bucket scales (or equivalent), will be used to remove materials from the filter cake enclosure, the coarse material staging area, or the debris staging area. 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 scale 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 release the liner and 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 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 lids, tarpaulins, or Type 2 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 2011 season to enable determination of net loaded weight. After a rail car block has been loaded and the waste is 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 to make up a full unit train.

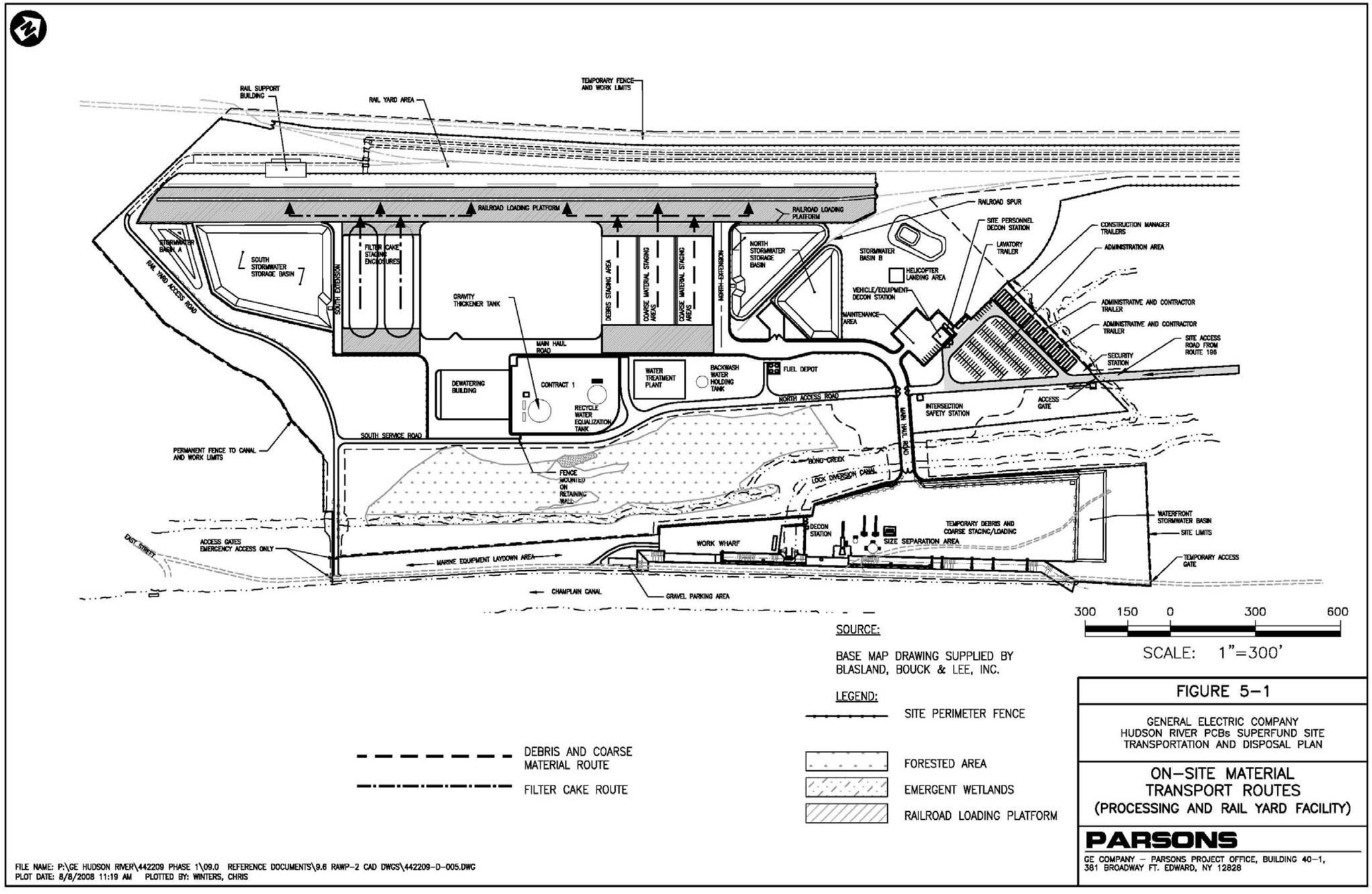
Once the unit train has been assembled and tracks properly secured, an initial terminal air test will be administered in accordance with 49 CFR § 232.217 (train brake tests using yard air). Additionally, inspection of end-of-train devices in accordance with 49 CFR § 232.409 will be completed by CPR as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

The RYOC will prepare necessary documentation of the above-described weighing and inspections, including rail manifests. Information for rail and hazardous 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 selected disposal facility.

The manifests and other documents for the outbound train will be kept in a weatherproof location so that the CPR crew can access the documents when they arrive to pick up the train. An electronic copy will be transmitted to CPR through an electronic data interchange (EDI) protocol 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). At the end of the shipping season, final 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, 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 washed to remove any staining. 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 C. This procedure is specifically applicable to the GE Hudson River Project and was used during Phase 1 after submittal to EPA in October, 2010.


RAIL SUPPORT BUILDING
RAIL YARD AREA
TEMPORARY FENCE AND WORK LIMITS
RAILROAD LOADING PLATFORM
RAILROAD LOADING PLATFORM
RAILROAD SPUR
SITE PERSONNEL DECON STATION
LAVATORY TRAILER
CONSTRUCTION MANAGER TRAILERS
ADMINISTRATION AREA
ADMINISTRATIVE AND CONTRACTOR TRAILER
ADMINISTRATIVE AND CONTRACTOR TRAILER
SECURITY STATION
SITE ACCESS ROAD FROM ROUTE 186
STORMWATER BASIN A
RAIL YARD ACCESS ROAD
SOUTH STORMWATER STORAGE BASIN
SOUTH EXTENSION
FILTER CAKE STAGING ENCLOSURES
GRAVITY THICKENER TANK
DEBRIS STAGING AREA
COARSE MATERIAL STAGING AREAS
COARSE MATERIAL STAGING AREAS
NORTH EXTENSION
NORTH STORMWATER STORAGE BASIN
STORMWATER BASIN B
HELICOPTER LANDING AREA
VEHICLE/EQUIPMENT DECON STATION
MAINTENANCE AREA
MAIN HAUL ROAD
DEWATERING BUILDING
CONTRACT 1
RECYCLE WATER EQUALIZATION TANK
WATER TREATMENT PLANT
BACKWASH WATER HOLDING TANK
FUEL DEPOT
NORTH ACCESS ROAD
INTERSECTION SAFETY STATION
ACCESS GATE
MAIN HAUL ROAD
SOUTH SERVICE ROAD
PERMANENT FENCE TO CANAL AND WORK LIMITS
FENCE MOUNTED ON RETAINING WALL
BOND CREEK
LOCK DIVERSION CANAL
WATERFRONT STORMWATER BASIN
SITE LIMITS
TEMPORARY ACCESS GATE
DECON STATION
SIZE SEPARATION AREA
TEMPORARY DEBRIS AND COARSE STAGING/LOADING
WORK WHARF
ACCESS GATES EMERGENCY ACCESS ONLY
EAST STREET
MARINE EQUIPMENT LAYDOWN AREA
CHAMPLAIN CANAL
GRAVEL PARKING AREA
300 150 0 300 600
SCALE: 1"=300'
SOURCE:
BASE MAP DRAWING SUPPLIED BY BLASLAND, BOUCK & LEE, INC.
LEGEND:
SITE PERIMETER FENCE
FORESTED AREA
EMERGENT WETLANDS
RAILROAD LOADING PLATFORM
DEBRIS AND COARSE MATERIAL ROUTE
FILTER CAKE ROUTE
FIGURE 5-1
GENERAL ELECTRIC COMPANY
HUDSON RIVER PCBs SUPERFUND SITE
TRANSPORTATION AND DISPOSAL PLAN
ON-SITE MATERIAL TRANSPORT ROUTES
(PROCESSING AND RAIL YARD FACILITY)
PARSONS
GE COMPANY – PARSONS PROJECT OFFICE, BUILDING 40-1,
381 BROADWAY FT. EDWARD, NY 12828
FILE NAME: P:\GE HUDSON RIVER\442209 PHASE 1\09.0 REFERENCE DOCUMENTS\9.6 RAWP-2 CAD DWGS\442209-D-005.DWG
PLOT DATE: 8/8/2008 11:19 AM PLOTTED BY: WINTERS, CHRIS

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 will obtain 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

EPA, NYSDEC, and receiving states have regulations and procedures for manifesting and tracking shipments of PCB waste, such as the dewatered sediments from the Upper Hudson River, through the transport and disposal process. These procedures will be utilized.

EPA's regulations under TSCA require that generators, transporters, and disposers of PCB wastes 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, 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 waste (at concentrations assumed at this site) 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 assure that sufficient copies accompany the waste shipment. More detailed information on the manifesting procedures is provided in Section 6.3 below.

6.3 WASTE MANIFESTING PROCEDURES

Both EPA (under its TSCA regulations) and NYSDEC (under its hazardous waste management regulations) require tracking of PCB waste disposition 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 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 D.

6.3.1 Manifesting Procedures for Unit Train Shipments

Because virtually all shipments 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 both the generating site and 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 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 sediment (i.e., debris, coarse material, and 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 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 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 manifest or shipping paper containing the manifest information (except for EPA ID numbers, generator certification, and signatures) accompanies the PCB waste at all times. The delivering railroad will sign the manifest to document acceptance for delivery. The selected waste disposal facility will also

confirm receipt of all waste (after weighing and inspection pursuant to disposal site procedures), sign the 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 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, 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 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.

6.5 REQUIRED REPORTING

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

Any 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 waste shipments from the 2011 season, GE will prepare a report covering the total quantity of 2011 dewatered sediments transported and disposed of, and will submit the report to NYSDEC, with copy to EPA, by March 1, 2012. In addition, the 2011 amounts will be included in the Remedial Action Report prepared at the end of Phase 2, as required under Paragraph 57.b of the CD.

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 2011* (2011 RA HASP; Parsons, 2011b**)** defines minimum safety and health requirements, guidelines, and practices applicable to the overall 2011 RA project, including the processing facility and rail yard operations. For complete details on the project health and safety program, please refer to that 2011 RA HASP.

The 2011 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 2011 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 2011 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 2011 RAWP;
- Prescribe the protective measures necessary to control those hazards;
- Define emergency procedures; and
- Prescribe training and medical qualification criteria for site personnel.

The 2011 RA HASP must be reviewed by all contractor and subcontract managers, supervisors, foremen, and safety personnel. All project personnel performing field activities will receive a site-specific project orientation summarizing the content of the 2011 RA HASP. All personnel will be required to sign the appropriate documentation acknowledging an understanding of the 2011 RA HASP requirements.

The 2011 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 2011 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 2011 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 2011 RA HASP.

The PFOC's HASP and the RYOC's HASP will be appended to the 2011 RA HASP. These contractor HASPs cover on-site transport of dewatered sediment, specifically including:

- Traffic safety during on-site transport of materials to 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 pursuant to 49 CFR §§ 214-240;
- 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 2011 Facility O&M Plan. In addition to other areas where PCB-containing material will be handled, the EZ includes the Filter Cake Staging Enclosures, Debris and Coarse Material Staging Areas, 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. These areas include the rail-yard loading platform and loading track. 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 2011 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 prepare and 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 will provide storm water system inspection and maintenance procedures for the work area and will also address pollution prevention measures that the RYOC will follow to prevent spillage and releases from becoming pollutant sources in storm water. The RYOC's SWPPP will be maintained on-site available for EPA review. The storm water management system is also discussed in Section 5.3.2 of the 2011 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 2011 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 will each prepare and implement a comprehensive SPCC Plan. These SPCC Plans will provide contingency measures for potential spills resulting from these contractors' activities. These contractor SPCC Plans will conform to the Site-wide SPCC Plan as well as project technical specifications. They will be maintained on-site and will be available for EPA review. In addition to POL storage and management activities, these SPCC Plans will 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 will 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 will be 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 2011 Facility O&M Plan, and decontamination of personnel and equipment is described in Section 5.2 of that plan.

SECTION 9

REFERENCES

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. 2011. *Remedial Action Work Plan for Phase 2 Dredging and Facility Operations in 2011 – Hudson River PCBs Superfund Site.* April.

Parsons. 2011a. *Phase 2 Facility Operations and Maintenance Plan for 2011 – Hudson River PCBs Superfund Site.* (Appendix B to 2011 RAWP). April.

Parsons. 2011b. *Phase 2 Remedial Action Health and Safety Plan for 2011 – Hudson River PCBs Superfund Site.* (RA HASP). April.

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

ATTACHMENT A

WASTE PROFILE INFORMATION
(FOR DEWATERED SEDIMENT AND DEBRIS)

WASTE PROFILE INFORMATION

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: Carl Jakob TEL: 518.746.6071 X 210 FAX: 518.747.4108

24 Hr.-7 Day/Week Contact: Carl Jakob TEL: 518.705.3145 FAX: 518.747.4108

Email: Carl.Jakob@Parsons.com

US EPA IDENTIFICATION NUMBER NYD980763841

STATE IDENTIFICATION NUMBER D0036

Billing Contact (Invoicing): Karen Diel

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

TEL: 518.746.5311 FAX: 518.746.5703 Email: Karen.Diel@Parsons.com

Billing Contact (Accounts Payable): Seth Denning TEL: 518.862.2721

Email: David.Denning@GE.com

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 spill clean up material from a source 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
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 ☐ No
2. 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: 400,000 Tons; _____ Gallons; _____ Cubic Yards; _____ Drum(s); _____ Other (_____)

   Per: ☐ One Time ☐ Week ☐ Month ☐ Quarter ☒ Year
10. Comments/Special Handling: Projected quantity is approximate for 2011.

ATTACHMENT B

DISPOSAL FACILITY SUMMARIES

[Note: this attachment will be provided in an Addendum after receiving 2011 disposal facility input]

ATTACHMENT C

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 D

WASTE MANIFEST FORM AND INSTRUCTIONS

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)

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

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.