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Site Name (Subject): SED, INC. RADAR ROAD

Site ID (Document ID): NCD980600449

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Report Segment:

Description: General Correspondence, 1982 - 1992

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Access Level: PUBLIC

Division: WASTE MANAGEMENT

Section: SUPERFUND

Program (Document Group): SERB (SERB)

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*BOUND REPORTS ASSOCIATED WITH*  
**SED INC. [Radar Rd.]**

**Report List:**

1. **Phase I Screening Site Investigation: August 1991**
2. **Phase I Screening Site Inspection — Vol. I: January 1991**
3. **Phase I Screening Site Inspection — Vol. II: January 1991**
4. **Final Closeout Report: September 1987**
5. **SED Sites Cleanup Project Final/Close-Out Report: December 1986**



State of North Carolina  
Department of Environment, Health, and Natural Resources  
Division of Solid Waste Management  
P.O. Box 27687 · Raleigh, North Carolina 27611-7687

James G. Martin, Governor  
William W. Cobey, Jr., Secretary

William L. Meyer  
Director

January 7, 1992

Mr. Craig Benedikt  
EPA NC CERCLA Project Officer  
EPA Region IV Waste Division  
345 Courtland Street, NE  
Atlanta, Georgia 30365

RE: Confirmatory Sampling SED, Inc., Radar Road Site  
Greensboro, Guilford County, North Carolina  
NCD 980 600 449

Dear Mr. Benedikt:

As stated in my letter of August 16, 1991, the North Carolina Superfund Section visited the site to collect samples from the ditch which received effluent from the sewer line break. As can be seen from the sampling data, no residual contamination was detected, therefore, a disposition of NFRAP is still deemed appropriate

If you have any questions, please contact me at 919-733-2801.

Sincerely,

A handwritten signature in cursive script that reads "Harvey H. Allen".

Harvey H. Allen, PE  
Environmental Engineer

Enclosures

SOLID WASTE MANAGEMENT DIVISION  
SUPERFUND SECTION

RECEIVED  
DEC 9 1991  
CERCLA  
SUPERFUND SECTION

Chain of Custody Record

Hazardous Waste Materials

Location of Sampling: Generator Transporter  
 Treatment Facility Storage Facility  
Disposal Facility Landfill  
Other: \_\_\_\_\_

Company's Name NCD 980 600 449  
SED, INC, RADAR RD. SITE Telephone: \_\_\_\_\_

Address GREENSBORO, GUILFORD COUNTY

Collector's Name \_\_\_\_\_ Telephone: 919 733-2801  
signature

Date Sampled 9-11-91 Time Sampled \_\_\_\_\_

Type of Process Generating Waste \_\_\_\_\_

Field Information: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Field Sample No. 016380, 016381, 016382

Chain of Possession:

Harvey Allen Env. Engineer 9/11/91 - 9/12/91  
signature title inclusive dates

Joyce Davis Gen. Sec. III 12 Sept 91  
signature title inclusive dates

signature title inclusive dates

Results Reported:

McWalker Chemist 5 Dec 91  
signature title date

Instructions: Complete all applicable information including signatures, and submit with analysis request forms.





**SAMPLE ANALYSIS REQUEST**

CERCLA

DEC 9 1991

Site Number 41D 980 600 449 Field Sample Number 016381

Name of Site SED, INC. RADAR RD. SITE Site Location GREENSBORO, GUILFORD CO.

Collected By HARVEY ALLEN ID# 76 Date Collected 9/11/91 Time 13:40

Agency:  Hazardous Waste  Solid Waste  Superfund

**Sample Type**

<u>Environmental</u>	<u>Concentrate</u>	<u>Comments</u>
<input type="checkbox"/> Ground water (1)	<input type="checkbox"/> Solid (5)	<u>SED-02 (upstream)</u>
<input type="checkbox"/> Surface water (2)	<input type="checkbox"/> Liquid (6)	<u>250 mL</u>
<input type="checkbox"/> Soil (3)	<input type="checkbox"/> Sludge (7)	
<input checked="" type="checkbox"/> Other (4) <u>SEDIMENT</u>	<input type="checkbox"/> Other (8)	

**TCLP Compounds**

Inorganic Compounds	Results(mg/l)
<input checked="" type="checkbox"/> Arsenic	<u>&lt;0.01</u>
<input checked="" type="checkbox"/> Barium	<u>0.70</u>
<input checked="" type="checkbox"/> Cadmium	<u>&lt;0.08</u>
<input checked="" type="checkbox"/> Chromium	<u>&lt;0.10</u>
<input checked="" type="checkbox"/> Lead	<u>&lt;0.50</u>
<input checked="" type="checkbox"/> Mercury	<u>&lt;0.02</u>
<input checked="" type="checkbox"/> Selenium	<u>&lt;0.005</u>
<input checked="" type="checkbox"/> Silver	<u>&lt;0.10</u>

Organic Chemistry		Inorganic Chemistry	
Parameter	Results(mg/l)	Parameter	Results(mg/l) (mg/kg)
P&T:GC/MS		<input checked="" type="checkbox"/> Arsenic	<u>&lt;1.8</u>
Acid:B/N Ext.		<input checked="" type="checkbox"/> Barium	<u>60</u>
MTBE		<input checked="" type="checkbox"/> Cadmium	<u>&lt;16</u>
		Chloride	
		<input checked="" type="checkbox"/> Chromium	<u>&lt;19</u>
		Copper	
		Fluoride	
		Iron	
		<input checked="" type="checkbox"/> Lead	<u>24</u>
		Manganese	
		<input checked="" type="checkbox"/> Mercury	<u>&lt;0.1</u>
		Nitrate	
		<input checked="" type="checkbox"/> Selenium	<u>&lt;47</u>
		<input checked="" type="checkbox"/> Silver	<u>&lt;19</u>
		Sulfates	
		Zinc	
		pH	
		Conductivity	
		TDS	
		TOC	

Radiochemistry	
Parameter	Results (PCI/l)
Gross Alpha	
Gross Beta	

Microbiology	
Parameter	Results (Col/100ml)

Organic Compounds	Results(mg/l)
benzene	
carbon tetrachloride	
chlordane	
chlorobenzene	
chloroform	
o-cresol	
m-cresol	
p-cresol	
cresol	
1,4-dichlorobenzene	
1,2-dichloroethane	
1,1-dichloroethylene	
2,4-dinitrotoluene	
heptachlor	
hexachlorobenzene	
hexachlorobutadiene	
hexachloroethane	
methyl ethyl ketone	
nitrobenzene	
pentachlorophenol	
pyridine	
tetrachloroethylene	
trichloroethylene	
2,4,5-trichlorophenol	
2,4,6-trichlorophenol	
vinyl chloride	
endrin	
lindane	
methoxychlor	
toxaphene	
2,4-D	
2,4,5-TP (Silvex)	

Date Received \_\_\_\_\_ Reported by \_\_\_\_\_

Date Extracted \_\_\_\_\_ Date Reported \_\_\_\_\_

Date Analyzed \_\_\_\_\_ Lab Number \_\_\_\_\_

**SAMPLE ANALYSIS REQUEST**

CERCLA

REC'D 9 1991  
SUPERFUND SECTION

Site Number 41D 980 600 449 Field Sample Number 016382

Name of Site SED, INC. RADAR RD. SITE Site Location GREENSBORO, GUILFORD CO.

Collected By HARVEY ALLEN ID# 76 Date Collected 9/11/91 Time 13:59

Agency:  Hazardous Waste  Solid Waste  Superfund

Sample Type		Comments
Environmental	Concentrate	
<input type="checkbox"/> Ground water (1)	<input type="checkbox"/> Solid (5)	<u>SED-03 (downstream)</u>
<input type="checkbox"/> Surface water (2)	<input type="checkbox"/> Liquid (6)	<u>250 mL</u>
<input type="checkbox"/> Soil (3)	<input type="checkbox"/> Sludge (7)	
<input checked="" type="checkbox"/> Other (4) <u>SEDIMENT</u>	<input type="checkbox"/> Other (8)	

**TCLP Compounds**

Inorganic Compounds	Results(mg/l)
<input checked="" type="checkbox"/> Arsenic	<u>&lt;0.01</u>
<input checked="" type="checkbox"/> Barium	<u>0.99</u>
<input checked="" type="checkbox"/> Cadmium	<u>&lt;0.08</u>
<input checked="" type="checkbox"/> Chromium	<u>&lt;0.10</u>
<input checked="" type="checkbox"/> Lead	<u>&lt;0.50</u>
<input checked="" type="checkbox"/> Mercury	<u>&lt;0.02</u>
<input checked="" type="checkbox"/> Selenium	<u>&lt;0.005</u>
<input checked="" type="checkbox"/> Silver	<u>&lt;0.10</u>

Organic Chemistry		Inorganic Chemistry	
Parameter	Results(mg/l)	Parameter	Results(mg/l)(mg/kg)
<input type="checkbox"/> P&T:GC/MS		<input checked="" type="checkbox"/> Arsenic	<u>&lt;1.8</u>
<input type="checkbox"/> Acid:B/N Ext.		<input checked="" type="checkbox"/> Barium	<u>38</u>
<input type="checkbox"/> MTBE		<input checked="" type="checkbox"/> Cadmium	<u>&lt;16</u>
		<input type="checkbox"/> Chloride	
		<input checked="" type="checkbox"/> Chromium	<u>&lt;19</u>
		<input type="checkbox"/> Copper	
		<input type="checkbox"/> Fluoride	
		<input type="checkbox"/> Iron	
		<input checked="" type="checkbox"/> Lead	<u>19</u>
		<input type="checkbox"/> Manganese	
		<input checked="" type="checkbox"/> Mercury	<u>&lt;0.1</u>
		<input type="checkbox"/> Nitrate	
		<input checked="" type="checkbox"/> Selenium	<u>&lt;47</u>
		<input checked="" type="checkbox"/> Silver	<u>&lt;19</u>
		<input type="checkbox"/> Sulfates	
		<input type="checkbox"/> Zinc	
		<input type="checkbox"/> pH	
		<input type="checkbox"/> Conductivity	
		<input type="checkbox"/> TDS	
		<input type="checkbox"/> TOC	

Radiochemistry	
Parameter	Results (PCI/l)
<input type="checkbox"/> Gross Alpha	
<input type="checkbox"/> Gross Beta	

Microbiology	
Parameter	Results (Col/100ml)

Organic Compounds	Results(mg/l)
<input type="checkbox"/> benzene	
<input type="checkbox"/> carbon tetrachloride	
<input type="checkbox"/> chlordane	
<input type="checkbox"/> chlorobenzene	
<input type="checkbox"/> chloroform	
<input type="checkbox"/> o-cresol	
<input type="checkbox"/> m-cresol	
<input type="checkbox"/> p-cresol	
<input type="checkbox"/> cresol	
<input type="checkbox"/> 1,4-dichlorobenzene	
<input type="checkbox"/> 1,2-dichloroethane	
<input type="checkbox"/> 1,1-dichloroethylene	
<input type="checkbox"/> 2,4-dinitrotoluene	
<input type="checkbox"/> heptachlor	
<input type="checkbox"/> hexachlorobenzene	
<input type="checkbox"/> hexachlorobutadiene	
<input type="checkbox"/> hexachloroethane	
<input type="checkbox"/> methyl ethyl ketone	
<input type="checkbox"/> nitrobenzene	
<input type="checkbox"/> pentachlorophenol	
<input type="checkbox"/> pyridine	
<input type="checkbox"/> tetrachloroethylene	
<input type="checkbox"/> trichloroethylene	
<input type="checkbox"/> 2,4,5-trichlorophenol	
<input type="checkbox"/> 2,4,6-trichlorophenol	
<input type="checkbox"/> vinyl chloride	
<input type="checkbox"/> endrin	
<input type="checkbox"/> lindane	
<input type="checkbox"/> methoxychlor	
<input type="checkbox"/> toxaphene	
<input type="checkbox"/> 2,4-D	
<input type="checkbox"/> 2,4,5-TP (Silvex)	

Date Received \_\_\_\_\_ Reported by \_\_\_\_\_

Date Extracted \_\_\_\_\_ Date Reported \_\_\_\_\_

Date Analyzed \_\_\_\_\_ Lab Number \_\_\_\_\_



**Purpose:** Enforcement and compliance with the N.C. Solid and Hazardous Waste Management Rules.

**Preparation:** A sample analysis request form must be completed for each type of evaluation requested (e.g., inorganic, organic, microbiology, radiochemistry). For sampling conditions which require more than one (1) container (i.e., ground or surface water) a sample label must be affixed to one of the containers. The collector must then write the site and sample number on the duplicate container.

Do not submit an analysis request form without any parameters indicated.

Equivalent measurements:      ppm =  $\mu\text{g/ml}$  =  $\text{mg/l}$  =  $\mu\text{g/g}$  =  $\text{mg/kg}$   
ppb =  $\mu\text{g/l}$  =  $\mu\text{g/1000g}$  =  $\mu\text{g/kg}$

### DEFINITIONS/INSTRUCTIONS

**Site Number** - A unique twelve-digit site/location identifier (i.e., the EPA identification number).

**Field Sample Number** - A unique six-digit sample identifier which is pre-printed on the sample label.

**Name of Site** - Name of facility, landfill, etc.

**Site Location** - City and county.

**Collected By** - Name and staff identification number of collector.

**Date and Time Collected** - Self-explanatory.

**Environmental** - A sample of a naturally occurring substance such as ground water, surface water, or soils which may be contaminated.

**Concentrate** - A sample of a waste, including but not limited to, sludges, resins, treatment effluents, or drummed wastes.

**Comments** - Lists details regarding sample or sample point (e.g., sample location, well number, phase separation, and/or odors).

**Inorganic Chemistry** - Check (✓) the desired parameters to be analyzed. If not listed, enter the element/compound in the space provided.

**Organic Chemistry** - Check (✓) the desired parameters to be analyzed. If not listed, enter the element/compound in the space provided.

**TCLP Compounds** - Check (✓) the desired parameters to be analyzed. If not listed, enter the element/compound in the space provided. TCLP can only be performed on solid or semi-solid samples. For totals of the inorganic parameters, check (✓) the corresponding parameter under Inorganic Chemistry.

**Microbiology and Radiochemistry** - Contact the Raleigh office prior to sampling either of these.

**Distribution:**

1. Send or deliver the original to the State Laboratory of Public Health.
2. The Lab then sends a copy (with results) to the Solid Waste Management Division.
3. The Solid Waste Management Division sends a copy to the field person or collector.

**Disposition:** This form may be destroyed in accordance with the Environmental Health, Solid and Hazardous Waste Section of the Records Disposition Schedule as published by the North Carolina Division of Archives and History

Additional forms may be ordered from: Solid Waste Management Division  
Hazardous Waste Section  
P.O. Box 27687  
Raleigh, NC 27611

**SAMPLE ANALYSIS REQUEST**

CERCLA

Site Number 41D 980 600 449 Field Sample Number 015151

Name of Site SED, INC. RADAR RD. SITE Site Location GREENSBORO, GUILFORD CO.

Collected By HARVEY ALLEN ID# 76 Date Collected 9/11/91 Time 13:20

Agency:  Hazardous Waste  Solid Waste  Superfund

Sample Type		
Environmental	Concentrate	Comments
<input type="checkbox"/> Ground water (1)	<input type="checkbox"/> Solid (5)	<u>SED-01 (SOURCE)</u>
<input type="checkbox"/> Surface water (2)	<input type="checkbox"/> Liquid (6)	<u>BNA'S</u>
<input type="checkbox"/> Soil (3)	<input type="checkbox"/> Sludge (7)	
<input checked="" type="checkbox"/> Other (4) <u>SEDIMENT</u>	<input type="checkbox"/> Other (8)	

TCLP Compounds	
Inorganic Compounds	Results(mg/l)
<input type="checkbox"/> Arsenic	
<input type="checkbox"/> Barium	
<input type="checkbox"/> Cadmium	
<input type="checkbox"/> Chromium	
<input type="checkbox"/> Lead	
<input type="checkbox"/> Mercury	
<input type="checkbox"/> Selenium	
<input type="checkbox"/> Silver	

Organic Compounds	Results(mg/l)
<input type="checkbox"/> benzene	
<input type="checkbox"/> carbon tetrachloride	
<input type="checkbox"/> chlordane	
<input type="checkbox"/> chlorobenzene	
<input type="checkbox"/> chloroform	
<input type="checkbox"/> o-cresol	
<input type="checkbox"/> m-cresol	
<input type="checkbox"/> p-cresol	
<input type="checkbox"/> cresol	
<input type="checkbox"/> 1,4-dichlorobenzene	
<input type="checkbox"/> 1,2-dichloroethane	
<input type="checkbox"/> 1,1-dichloroethylene	
<input type="checkbox"/> 2,4-dinitrotoluene	
<input type="checkbox"/> heptachlor	
<input type="checkbox"/> hexachlorobenzene	
<input type="checkbox"/> hexachlorobutadiene	
<input type="checkbox"/> hexachloroethane	
<input type="checkbox"/> methyl ethyl ketone	
<input type="checkbox"/> nitrobenzene	
<input type="checkbox"/> pentachlorophenol	
<input type="checkbox"/> pyridine	
<input type="checkbox"/> tetrachloroethylene	
<input type="checkbox"/> trichloroethylene	
<input type="checkbox"/> 2,4,5-trichlorophenol	
<input type="checkbox"/> 2,4,6-trichlorophenol	
<input type="checkbox"/> vinyl chloride	
<input type="checkbox"/> endrin	
<input type="checkbox"/> lindane	
<input type="checkbox"/> methoxychlor	
<input type="checkbox"/> toxaphene	
<input type="checkbox"/> 2,4-D	
<input type="checkbox"/> 2,4,5-TP (Silvex)	

Organic Chemistry		Inorganic Chemistry	
Parameter	Results(mg/l)	Parameter	Results(mg/l)(mg/kg)
<input type="checkbox"/> P&T:GC/MS		<input type="checkbox"/> Arsenic	
<input checked="" type="checkbox"/> Acid:B/N Ext.		<input type="checkbox"/> Barium	
<input type="checkbox"/> MTBE		<input type="checkbox"/> Cadmium	
<input checked="" type="checkbox"/> PCB's	<u>&lt; 0.10 ppm</u>	<input type="checkbox"/> Chloride	
		<input type="checkbox"/> Chromium	
		<input type="checkbox"/> Copper	
		<input type="checkbox"/> Fluoride	
		<input type="checkbox"/> Iron	
		<input type="checkbox"/> Lead	
		<input type="checkbox"/> Manganese	
		<input type="checkbox"/> Mercury	
		<input type="checkbox"/> Nitrate	
		<input type="checkbox"/> Selenium	
		<input type="checkbox"/> Silver	
		<input type="checkbox"/> Sulfates	
		<input type="checkbox"/> Zinc	
		<input type="checkbox"/> pH	
		<input type="checkbox"/> Conductivity	
		<input type="checkbox"/> TDS	
		<input type="checkbox"/> TOC	

Radiochemistry	
Parameter	Results (PCI/l)
<input type="checkbox"/> Gross Alpha	
<input type="checkbox"/> Gross Beta	

Microbiology	
Parameter	Results (Col/100ml)

Date Received 9/12/91 Reported by \_\_\_\_\_

Date Extracted 9-19-91 Date Reported \_\_\_\_\_

Date Analyzed 9-23-91 Lab Number 913430

**RECEIVED**  
NOV 1 1991  
**SUPERFUND SECTION**

BNA  
VP  
BIO

**SAMPLE ANALYSIS REQUEST**

CERCLA

Site Number 41D 980 600 449 Field Sample Number 015152

Name of Site SED, INC. RADAR RD. SITE Site Location GREENSBORO, GUILFORD CO.

Collected By HARVEY ALLEN ID# 76 Date Collected 9/11/91 Time 13:40

Agency:  Hazardous Waste  Solid Waste  Superfund

**Sample Type**

Environmental	Concentrate	Comments
<input type="checkbox"/> Ground water (1)	<input type="checkbox"/> Solid (5)	<u>SED-02 (up-stream)</u>
<input type="checkbox"/> Surface water (2)	<input type="checkbox"/> Liquid (6)	<u>VOA</u>
<input type="checkbox"/> Soil (3)	<input type="checkbox"/> Sludge (7)	
<input checked="" type="checkbox"/> Other (4) <u>SEDIMENT</u>	<input type="checkbox"/> Other (8)	

**TCLP Compounds**

Inorganic Compounds	Results(mg/l)
<input type="checkbox"/> Arsenic	
<input type="checkbox"/> Barium	
<input type="checkbox"/> Cadmium	
<input type="checkbox"/> Chromium	
<input type="checkbox"/> Lead	
<input type="checkbox"/> Mercury	<u>NOV 7 1991</u>
<input type="checkbox"/> Selenium	
<input type="checkbox"/> Silver	

**RECEIVED**  
**SUPERFUND SECTION**

Organic Chemistry		Inorganic Chemistry	
Parameter	Results(mg/l)	Parameter	Results(mg/l)(mg/kg)
<input checked="" type="checkbox"/> P&T:GC/MS		<input type="checkbox"/> Arsenic	
<input type="checkbox"/> Acid:B/N Ext.		<input type="checkbox"/> Barium	
<input type="checkbox"/> MTBE		<input type="checkbox"/> Cadmium	
		<input type="checkbox"/> Chloride	
		<input type="checkbox"/> Chromium	
		<input type="checkbox"/> Copper	
		<input type="checkbox"/> Fluoride	
		<input type="checkbox"/> Iron	
		<input type="checkbox"/> Lead	
		<input type="checkbox"/> Manganese	
		<input type="checkbox"/> Mercury	
		<input type="checkbox"/> Nitrate	
		<input type="checkbox"/> Selenium	
		<input type="checkbox"/> Silver	
		<input type="checkbox"/> Sulfates	
		<input type="checkbox"/> Zinc	
		<input type="checkbox"/> pH	
		<input type="checkbox"/> Conductivity	
		<input type="checkbox"/> TDS	
		<input type="checkbox"/> TOC	

Radiochemistry	
Parameter	Results (PCI/l)
<input type="checkbox"/> Gross Alpha	
<input type="checkbox"/> Gross Beta	

Microbiology	
Parameter	Results (Col/100ml)

Organic Compounds	Results(mg/l)
<input type="checkbox"/> benzene	
<input type="checkbox"/> carbon tetrachloride	
<input type="checkbox"/> chlordane	
<input type="checkbox"/> chlorobenzene	
<input type="checkbox"/> chloroform	
<input type="checkbox"/> o-cresol	
<input type="checkbox"/> m-cresol	
<input type="checkbox"/> p-cresol	
<input type="checkbox"/> cresol	
<input type="checkbox"/> 1,4-dichlorobenzene	
<input type="checkbox"/> 1,2-dichloroethane	
<input type="checkbox"/> 1,1-dichloroethylene	
<input type="checkbox"/> 2,4-dinitrotoluene	
<input type="checkbox"/> heptachlor	
<input type="checkbox"/> hexachlorobenzene	
<input type="checkbox"/> hexachlorobutadiene	
<input type="checkbox"/> hexachloroethane	
<input type="checkbox"/> methyl ethyl ketone	
<input type="checkbox"/> nitrobenzene	
<input type="checkbox"/> pentachlorophenol	
<input type="checkbox"/> pyridine	
<input type="checkbox"/> tetrachloroethylene	
<input type="checkbox"/> trichloroethylene	
<input type="checkbox"/> 2,4,5-trichlorophenol	
<input type="checkbox"/> 2,4,6-trichlorophenol	
<input type="checkbox"/> vinyl chloride	
<input type="checkbox"/> endrin	
<input type="checkbox"/> lindane	
<input type="checkbox"/> methoxychlor	
<input type="checkbox"/> toxaphene	
<input type="checkbox"/> 2,4-D	
<input type="checkbox"/> 2,4,5-TP (Silvex)	

Date Received 9/12/91 NW Reported by \_\_\_\_\_

Date Extracted \_\_\_\_\_ Date Reported \_\_\_\_\_

Date Analyzed 10-29-91 NW Lab Number 913431



**SAMPLE ANALYSIS REQUEST**

CERCLA

Site Number 41D 980 600 449 Field Sample Number 015 L54

Name of Site SED, INC - RADAR RD. SITE Site Location GREENSBORO, GUILFORD CO.

Collected By HARVEY ALLEN ID# 76 Date Collected 9/11/91 Time 13:59

Agency:  Hazardous Waste  Solid Waste  Superfund

Sample Type		Comments
Environmental	Concentrate	
<input type="checkbox"/> Ground water (1)	<input type="checkbox"/> Solid (5)	<u>SED - 03 (downstream)</u>
<input type="checkbox"/> Surface water (2)	<input type="checkbox"/> Liquid (6)	<u>VDA</u>
<input type="checkbox"/> Soil (3)	<input type="checkbox"/> Sludge (7)	
<input checked="" type="checkbox"/> Other (4) <u>SEDIMENT</u>	<input type="checkbox"/> Other (8)	

TCLP Compounds	
Inorganic Compounds	Results(mg/l)
<input type="checkbox"/> Arsenic	
<input type="checkbox"/> Barium	
<input type="checkbox"/> Cadmium	
<input type="checkbox"/> Chromium	
<input type="checkbox"/> Lead	
<input type="checkbox"/> Mercury	
<input type="checkbox"/> Selenium	
<input type="checkbox"/> Silver	

**RECEIVED**  
NOV 1 1991  
**SUPERFUND SECTION**

Organic Chemistry		Inorganic Chemistry	
Parameter	Results(mg/l)	Parameter	Results(mg/l)(mg/kg)
<input checked="" type="checkbox"/> P&T:GC/MS		<input type="checkbox"/> Arsenic	
<input type="checkbox"/> Acid:B/N Ext.		<input type="checkbox"/> Barium	
<input type="checkbox"/> MTBE		<input type="checkbox"/> Cadmium	
		<input type="checkbox"/> Chloride	
		<input type="checkbox"/> Chromium	
		<input type="checkbox"/> Copper	
		<input type="checkbox"/> Fluoride	
		<input type="checkbox"/> Iron	
		<input type="checkbox"/> Lead	
		<input type="checkbox"/> Manganese	
		<input type="checkbox"/> Mercury	
		<input type="checkbox"/> Nitrate	
		<input type="checkbox"/> Selenium	
		<input type="checkbox"/> Silver	
		<input type="checkbox"/> Sulfates	
		<input type="checkbox"/> Zinc	
		<input type="checkbox"/> pH	
		<input type="checkbox"/> Conductivity	
		<input type="checkbox"/> TDS	
		<input type="checkbox"/> TOC	

Radiochemistry	
Parameter	Results (PCI/l)
<input type="checkbox"/> Gross Alpha	
<input type="checkbox"/> Gross Beta	

Microbiology	
Parameter	Results (Col/100ml)

Organic Compounds	Results(mg/l)
<input type="checkbox"/> benzene	
<input type="checkbox"/> carbon tetrachloride	
<input type="checkbox"/> chlordane	
<input type="checkbox"/> chlorobenzene	
<input type="checkbox"/> chloroform	
<input type="checkbox"/> o-cresol	
<input type="checkbox"/> m-cresol	
<input type="checkbox"/> p-cresol	
<input type="checkbox"/> cresol	
<input type="checkbox"/> 1,4-dichlorobenzene	
<input type="checkbox"/> 1,2-dichloroethane	
<input type="checkbox"/> 1,1-dichloroethylene	
<input type="checkbox"/> 2,4-dinitrotoluene	
<input type="checkbox"/> heptachlor	
<input type="checkbox"/> hexachlorobenzene	
<input type="checkbox"/> hexachlorobutadiene	
<input type="checkbox"/> hexachloroethane	
<input type="checkbox"/> methyl ethyl ketone	
<input type="checkbox"/> nitrobenzene	
<input type="checkbox"/> pentachlorophenol	
<input type="checkbox"/> pyridine	
<input type="checkbox"/> tetrachloroethylene	
<input type="checkbox"/> trichloroethylene	
<input type="checkbox"/> 2,4,5-trichlorophenol	
<input type="checkbox"/> 2,4,6-trichlorophenol	
<input type="checkbox"/> vinyl chloride	
<input type="checkbox"/> endrin	
<input type="checkbox"/> lindane	
<input type="checkbox"/> methoxychlor	
<input type="checkbox"/> toxaphene	
<input type="checkbox"/> 2,4-D	
<input type="checkbox"/> 2,4,5-TP (Silvex)	

Date Received 9/12/91 NB Reported by \_\_\_\_\_

Date Extracted \_\_\_\_\_ Date Reported \_\_\_\_\_

Date Analyzed 10-29-91 NW Lab Number 913433



SAMPLE ANALYSES REQUEST

Site Number 41D 980 600 449 Field Sample Number 015156  
 Name of Site SES, Inc., Radaw Road Site Site Location Greensboro, Guilford Co.  
 Collected By Harvey Allen ID# 76 Date Collected 9/10/91 Time 8:45

Type of Sample:

Environmental Concentrate  
 Groundwater (1)  Solid (5)  
 Surface Water (2)  Liquid (6)  
 Soil (3)  Sludge (7)  
 Other (4) Water  Other (8)

Comments Trip Blank (VOA)  
**RECEIVED**  
 NOV 1 1991

INORGANIC CHEMISTRY

**SUPERFUND SECTION**

Extractables		Total			
Parameter	Results mg/l	Parameter	Results mg/l	Parameter	Results mg/l
_____ Arsenic	_____	_____ Arsenic	_____	_____ Silver	_____
_____ Barium	_____	_____ Barium	_____	_____ Sulfates	_____
_____ Cadmium	_____	_____ Cadmium	_____	_____ Zinc	_____
_____ Chromium	_____	_____ Chloride	_____	_____ Ph	_____
_____ Lead	_____	_____ Chromium	_____	_____ Conductivity	_____
_____ Mercury	_____	_____ Copper	_____	_____ TDS	_____
_____ Selenium	_____	_____ Fluoride	_____	_____ TOC	_____
_____ Silver	_____	_____ Iron	_____		
_____		_____ Lead	_____		
_____		_____ Manganese	_____		
_____		_____ Mercury	_____		
_____		_____ Nitrate	_____		
_____		_____ Selenium	_____		

ORGANIC CHEMISTRY

Parameter	Results mg/l	Parameter	Results mg/l	Parameter	Results mg/l
<input checked="" type="checkbox"/> P&T:GC/MS	_____	_____ EDB	_____	_____ Methoxychlor	_____
_____ Acid:B/N Ext.	_____	_____ PCB's	_____	_____ Toxaphene	_____
_____ TOX	_____	_____ Petroleum	_____	_____ 2,4-D	_____
_____		_____ Endrin	_____	_____ 2,4,5-TP (silvex)	_____
_____		_____ Lindane	_____		

MICROBIOLOGY

RADIOCHEMISTRY

Parameter	Parameter	Results PCi/l
_____ (MF) Coliform Colonies/100mls	_____ Gross Alpha	_____
_____ (MPN) Coliform Colonies/100mls	_____ Gross Beta	_____
_____		
_____		

Date Received 9-12-91 mw Date Reported \_\_\_\_\_  
 Date Extracted \_\_\_\_\_ Date Analyzed 10-29-91 mw  
 Reported By \_\_\_\_\_ Lab Number 913135

SOLID WASTE MANAGEMENT DIVISION  
SUPERFUND SECTION

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CERCLA

NOV 1 1991

SUPERFUND SECTION

Chain of Custody Record

Hazardous Waste Materials

Location of Sampling:  Generator  Transporter  
 Treatment Facility  Storage Facility  
 Disposal Facility  Landfill  
 Other: \_\_\_\_\_

Company's Name SED INC. RADAR RD. SITE Telephone: \_\_\_\_\_

Address GREENSBORO, GUILFORD COUNTY

Collector's Name \_\_\_\_\_ Telephone: 919 733-2801  
signature

Date Sampled 9-11-91 Time Sampled \_\_\_\_\_

Type of Process Generating Waste \_\_\_\_\_

Field Information: \_\_\_\_\_

Field Sample No. 015150, 015151, 015152, 015153, 015154, 015155, 015156

Chain of Possession:

<u>Harvey Allen</u> signature	<u>Env. Engineer</u> title	<u>9/11/91 - 9/12/91</u> inclusive dates
<u>MC [Signature]</u> signature	<u>Chemistry Tech.</u> title	<u>9/12/91</u> inclusive dates
_____ signature	_____ title	_____ inclusive dates

Results Reported:

<u>John L. Neal</u> signature	<u>Chemist</u> title	<u>10-30-91</u> date
----------------------------------	-------------------------	-------------------------

Instructions: Complete all applicable information including signatures, and submit with analysis request forms.



STATE LABORATORY OF PUBLIC HEALTH  
 DIVISION OF HEALTH SERVICES, N.C. DEPARTMENT OF HUMAN RESOURCES  
 P.O. BOX 28047 - 306 N. WILMINGTON, ST., RALEIGH, N.C. 27611

ORGANIC CHEMICAL ANALYSIS

BASE/NEUTRAL AND ACID EXTRACTABLES	LAB NO	913430	913432	913434			
	FIELD #	15151	15153	15155			
COMPOUND	TYPE	(4)	(4)	(4)	( )	( )	( )
	UNITS	µg/l µg/kg					
N-nitrosodimethylamine	10/330	u	u	u			
bis(2-chloroethyl)ether							
2-chlorophenol							
phenol							
1,3-dichlorobenzene							
1,4-dichlorobenzene							
1,2-dichlorobenzene							
bis(2-chloroisopropyl)ether							
hexachloroethane							
N-nitroso-di-n-propylamine							
nitrobenzene							
isophorone							
2-nitrophenol							
2,4-dimethylphenol							
bis(2-chloroethoxy)methane							
2,4-dichlorophenol							
1,2,4-trichlorobenzene							
naphthalene							
hexachlorobutadiene							
4-chloro-m-cresol							
hexachlorocyclopentadiene							
2,4,6-trichlorophenol							
2-chloronaphthalene							
acenaphthylene							
dimethyl phthalate							
2,6-dinitrotoluene							
acenaphthene	↓						
2,4-dinitrophenol	50/1650						
2,4-dinitrotoluene	10/330						
4-nitrophenol	50/1650						
fluorene	10/330						
4-chlorophenylphenylether	↓						
diethyl phthalate	↓						
4,6-dinitro-o-cresol	50/1650						
diphenylamine	↓						
azobenzene	↓						
4-bromophenylphenylether	10/330						
hexachlorobenzene	10/330						
pentachlorophenol	50/1650						
phenanthrene	10/330						
anthracene	↓						
dibutyl phthalate	↓						
fluoranthene	↓						

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 JUL 1 1991  
 SUPERFUND SECTION

MDL  
 H<sub>2</sub>O/SOIL

- J - Estimated value.
- K - Actual value is known to be less than value given.
- L - Actual value is known to be greater than value given.
- U - Material was analyzed for but not detected. The number is the Minimum Detection Limit. MDL
- NA - Not analyzed.
- 1/ - Tentative identification.
- 2/ - On NRDC List of Priority Pollutants.

STATE LABORATORY OF PUBLIC HEALTH  
 DIVISION OF HEALTH SERVICES, N.C. DEPARTMENT OF HUMAN RESOURCES  
 P.O. BOX 28047 - 306 N. WILMINGTON, ST., RALEIGH, N.C. 27611

ORGANIC CHEMICAL ANALYSIS

BASE/NEUTRAL AND ACID EXTRACTABLES COMPOUND	LAB NO	913430	913432	913434			
	FIELD #	15151	15153	15155			
	TYPE	(4)	(4)	(4)	( )	( )	( )
	UNITS	$\mu\text{g/l}$ $\mu\text{g/kg}$					
pyrene	10/330	u	u	u			
benzidine	50/1650	↓	↓	↓			
butyl benzyl phthalate	10/330	↓	↓	↓			
benz(a)anthracene	↓	↓	↓	↓			
chrysene	↓	↓	↓	↓			
3,3-dichlorobenzidine	50/1650	↓	↓	↓			
bis(2-ethylhexyl)phthalate	10/330	↓	↓	↓			
di-n-octyl phthalate	10/330	↓	↓	↓			
benzo(b)fluoranthene	50/1650	↓	↓	↓			
benzo(k)fluoranthene	↓	↓	↓	↓			
benzo(a)pyrene	↓	↓	↓	↓			
indeno(1,2,3-cd)pyrene	↓	↓	↓	↓			
dibenzo(a,h)anthracene	↓	↓	↓	↓			
benzo(g,h,i)perylene	↓	↓	↓	↓			
aniline	50/1650	u	u	u			
benzoic acid	↓	↓	↓	↓			
benzyl alcohol	↓	↓	↓	↓			
4-chloroaniline	↓	↓	↓	↓			
dibenzofuran	10/330	↓	↓	↓			
2-methylnaphthalene	↓	↓	↓	↓			
2-methylphenol	↓	↓	↓	↓			
4-methylphenol	↓	↓	↓	↓			
2-nitroaniline	50/1650	↓	↓	↓			
3-nitroaniline	↓	↓	↓	↓			
4-nitroaniline	↓	↓	↓	↓			
2,4,5-trichlorophenol	↓	↓	↓	↓			

RECEIVED  
 NOV 1 1981  
 SUPERFUND SECTION

MDL  
 H<sub>2</sub>O/SOIL

- J - Estimated value.
- K - Actual value is known to be less than value given.
- L - Actual value is known to be greater than value given.
- U - Material was analyzed for but not detected. The number is the Minimum Detection Limit. MDL
- NA - Not analyzed.
- 1/ - Tentative identification.
- 2/ - On NRDC List of Priority Pollutants.





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.  
ATLANTA, GEORGIA 30365

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SEP 17 1991  
SUPERFUND SECTION

SEP 12 1991

4WD-WPB

Ms. Pat DeRosa  
Superfund Section  
Division of Solid Waste  
North Carolina Department of Environment,  
Health and Natural Resources  
P.O. Box 27687  
Raleigh, North Carolina 27611

Dear Ms. DeRosa:

The U.S. Environmental Protection Agency, Region IV has reviewed the reports prepared by your office for the following sites:

SED, Inc., Radar Road Site, Greensboro (NCD980600449)  
SED, Inc., Swing Court Site, Greensboro (NCD980712038);  
Laurel Springs Site, Laurel Springs (NCD982119638); and  
Froehling & Robertson, Charlotte (NCD024473423).

The Region concurs with the State recommendations for no further remedial action under Superfund at this time.

If you or your staff have any questions, please contact me at (404) 347-5065.

Sincerely yours,

Deborah A. Vaughn-Wright  
Project Manager

file



FILE COPY

State of North Carolina  
Department of Environment, Health, and Natural Resources  
Division of Solid Waste Management  
P.O. Box 27687 · Raleigh, North Carolina 27611-7687

James G. Martin, Governor  
William W. Cobey, Jr., Secretary

William L. Meyer  
Director

August 19, 1991

Mr. Earl Tysinger  
Assistant Director of Environmental Health  
Guilford County Health Department  
Post Office Box 3508  
Greensboro, NC 27401-3508

RE: Screening Site Investigation Follow-Up Sampling  
SED, Inc., Radar Road Site  
NCD 980 600 449

Dear Mr. Tysinger:

David Lilley of the North Carolina Superfund Section spoke with you today to notify you that the North Carolina Superfund Section will collect environmental samples from the subject site located in Guilford County, North Carolina. The investigation will be conducted on September 11, 1991 by Harvey Allen of the North Carolina Superfund Section.

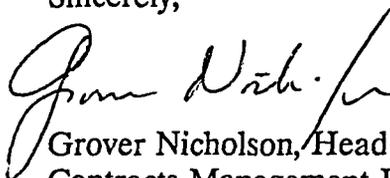
The purpose of the investigation is to determine if the site poses a hazard to public health or the environment because of releases of contaminants to soil, surface water, groundwater, or air. The investigation team will take samples on and around the site to determine if a hazardous condition exists.

This investigation is not an emergency situation but is a normal step in the evaluation of all uncontrolled and unregulated potential hazardous waste sites in North Carolina. You may want to have your representative meet the investigation team at the site. If so, please contact Harvey Allen at (919) 733-2801 and he will coordinate a meeting. I am enclosing background data on the site for your information.

Mr. Tysinger  
8-19-91  
Page 2

If the investigation indicates the need for future study of the site, we will contact your office to advise. If you have any questions, please don't hesitate to call David Lilley or me at (919) 733-2801.

Sincerely,



Grover Nicholson, Head  
Contracts Management Branch  
Superfund Section

Enclosures

cc: Dexter Matthews  
Doug Holyfield  
• Don Follmer  
Patricia Bowden  
Ann Rudd  
David Lilley  
File

Federal  
Trip Notification & Authorization

Prepared by: Harvey Allen

Today's Date: 8/16/91

\*Use Black Ink or Typewriter only-Staff to fill out first 2 blocks only.

Site Trip

Date of Trip: September 11, 1991

If trip date changed or cancelled note below:

Trip Date Changed To: \_\_\_\_\_ Cancelled: \_\_\_\_\_

NCD#: 980 600 449 Site Name: SED, Inc., Radar Road Site.  
City: Greensboro County: Guilford

Reason for Trip: Screening site in <sup>inversion</sup> following  
Post Phase I, SSI, Sampling

Name of Hotel (Overnight Trip): \_\_\_\_\_ Hotel Telephone Number: ( ) \_\_\_\_\_

Authorized by: David B. Alby  
Industrial Hygienist

Project Team Leader: Harvey Allen

Assistants: Grover Nicholson, \_\_\_\_\_

Attach To Notification Form: 1 copy each: Preliminary Assessment Form (First page only)  
Submit to the Site Map  
Industrial Hygienist PA Transmittal Letter

(Please list appropriate County Health Department contact person to call to advise of trip)  
Environmental Supervisor or Health Director to call: Earl Tysinger Title: Assistant Dir. of Env. Health  
(Note if Dr., M.P., etc.)  
Telephone Number: (919) 373-7613

Notes: Health Department Official Contacted: Edna McGuire/Earl Tysinger  
Back Up Letter Required: Yes  No   
Notified Ms. McGuire on 8-19-91 (DBL)  
Notified Mr. Tysinger on 8-19-91 (DBL)



FILE COPY

State of North Carolina  
Department of Environment, Health, and Natural Resources  
Division of Solid Waste Management  
P.O. Box 27687 · Raleigh, North Carolina 27611-7687

James G. Martin, Governor  
William W. Cobey, Jr., Secretary

William L. Meyer  
Director

August 16, 1991

Mr. Dan Pierce  
Bissell Co.  
4602 Dundas Drive  
Greensboro, NC 27407

RE: SED, Inc., Radar Road Site  
Greensboro, Guilford County, North Carolina  
EPA ID No. NCD 980 600 449

Dear Mr. Pierce:

As per our telephone conversation of August 16, 1991, I will be at the referenced site on September 11, 1991, to perform verification sampling of the ditch leading to Horsepen Creek and Horsepen Creek.

If you have any questions, please contact me at 919-733-2801.

Sincerely,

A handwritten signature in blue ink that reads "Harvey H. Allen".

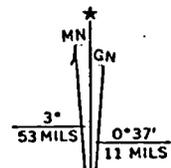
Harvey H. Allen, PE  
Environmental Engineer

# GUILFORD, N. C.

N3600-W7952.5/7.5

1951  
PHOTOREVISED 1968  
AMS 5056 III SW-SERIES V842

UTM GRID AND 1968 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET

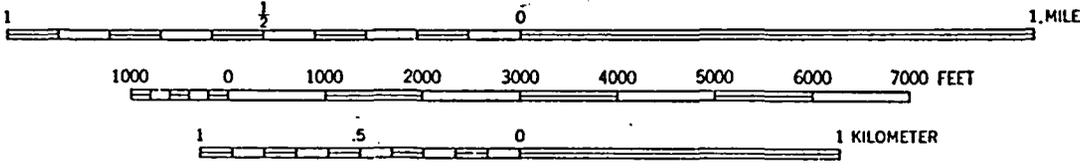


GREENSBORO HIGH POINT  
WINSTON-SALEM  
AIRPORT

SED, INC.  
500 RADAR RD  
GREENSBORO NC  
NCD 980 600 449

SED, INC.  
6219 SWING CT.  
GREENSBORO NC  
NCD 980 712 038

SCALE 1:24000



CONTOUR INTERVAL 10 FEET  
DATUM IS MEAN SEA LEVEL

RCRA/NPL POLICY QUESTIONNAIRE FOR INITIAL SCREENING

Site Name SED INC

City Greensboro State NC

Facility I.D. Number NE1980600449

Type of Facility: Generator  Transporter  TSD

I. RCRA APPLICABILITY	yes	no
Does the facility have RCRA interim status?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Did the facility ever have RCRA interim status?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Does the facility have a final or post-closure permit? If so, date issued _____	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Is the facility a non-notifier that has been identified by States or EPA?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Is the facility a known or possible protective filer?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

STOP HERE IF ALL ANSWERS TO QUESTIONS IN SECTION I ARE NO

II. FINANCIAL STATUS

Is the facility owned by an entity that has filed for bankruptcy under federal laws (Chapter 7 or 11) or State laws?

If yes, what has it filed under?  
Chapter 7  Chapter 11  Other

III. ENFORCEMENT

RCRA Status

Has the facility lost authorization to operate via LOIS, 3005(c) permit denial, 3008(h) IS termination, 3005(d) permit revocation?

Has the facility's Interim Status been terminated via another mechanism (i.e. administrative termination)?

*This company was a recycler of PCB oil.  
The company has had a clean-up done.*

CERCLA Status

What CERCLA financed remedial or removal activities have been initiated at the site? (RI/FS, RD/RA, O&M, forward planning, and removal; does not include enforcement or PA/SI activities)

Enforcement Status

YES NO

In general, would you characterize the facility as demonstrating an unwillingness to undertake corrective action based on prior State, CERCLA or RCRA actions?

\_\_\_\_\_

If yes, please describe and cite the authorities exercised.

Is the owner/operator a party to any enforcement action at the site? \_\_\_\_\_

If not, why not?

Are any PRPs (including owner/operators) undertaking remedial studies or action in response to CERCLA enforcement authorities? What is the extent/type of work that has been completed (RI/FS, etc.) and who (generators, owner/operator, etc.) is conducting the work?

May 8, 1990

To: SED, Inc. Site File

From: Bruce Nicholson **BN**

Subj: Telecon with R. Kelly Bowles [2109 N. Elm St., Greensboro, NC, (919)275-0501], Partner in the Airport Warehouse Limited Partnership and owner of the Warehouse at 6219 Swing Court.

I spoke with Mr. Bowles today concerning the cleanup of the SED, Inc. operation at his warehouse. He was aware that the cleanup had taken place but knew nothing more. I asked him for permission to visit the site and take samples from on site for our site investigation. He gave his permission for us to enter the site at any time. He said there are tenants in the warehouse and asked us not to disturb there operations, if possible. I told him that the investigation may take place later this month or not until August depending on when we obtained permission for a related warehouse owned by a separate company. He said that either time would be fine and he would not have to be on site. He requested a copy of the lab results when they were completed.

# Inside EPA's Environmental Policy Alert

An exclusive bi-weekly report tracking environmental legislation, regulation and litigation

Vol. VII No. 8 — April 18, 1990

**AIR ..... 8**

**Regulation**

**EPA formaldehyde rule may control other pollutants:** A recent EPA decision to regulate sources of formaldehyde emissions may assist the agency in making regulatory decisions about other emissions.

**Litigation**

**Recent court ruling may limit EPA enforcement authority:** A federal court has granted more leeway to states in deciding what control measures constitute Clean Air Act compliance, but EPA's enforcement powers have been expanded under a new penalty policy for CFC violations.

**HAZARDOUS WASTE ..... 13**

**Regulation**

**EPA wins tighter incinerator controls over OMB objections:** EPA has surmounted OMB cost objections to propose tough new controls on waste incinerators. The agency has also proposed for the first time a no-migration variance to the land ban.

**Litigation**

**Judge rebuffs EPA, rules state may retain RCRA authority:** An administrative law judge has decided that North Carolina may run its own hazardous waste program, rejecting EPA attempts to yank that power from the state.

**WATER ..... 18**

**Legislation**

**House panel clears oil/gas leasing bill:** State power to regulate the sale of oil and gas leases would be boosted under a bill passed by a House subcommittee. At a recent Clean Water Act hearing, state and local officials voiced their concerns that, without increased federal funding, they will fail to meet EPA requirements.

**Regulation**

**EPA rejects Georgia dioxin standard:** EPA has announced that it will reject for the first time a proposed state water quality standard for dioxin, instead setting a federal level. The agency has recently launched a nationwide effort to promote pollution prevention at city water treatment plants.

**Litigation**

**EPA settles with environmentalists over offshore drilling:** EPA will issue by 1993 final controls on offshore oil and gas drilling, settling a lengthy suit brought by environmentalists against the agency.

**TOXICS/PESTICIDES ..... 23**

**Bush Administration, Kennedy reach tentative food safety deal:** White House and Senate labor committee negotiators have reached a tentative agreement on allowable risks posed by pesticide residues on food. The manufacturer of aldicarb has voluntarily withdrawn the use of the pesticide on potatoes after tests showed that some residue levels were nine times the level permitted.

**CROSS-MEDIA ..... 30**

**Tougher sentencing guidelines delayed:** A federal policy to toughen sentences for environmental and other crimes committed by organizations has been delayed until 1991.

**CLEAN AIR ACTION ..... 2**

**House committee clears bill, action shifts to floor**

The House is now poised for floor action on the clean air bill after the Energy & Commerce Committee April 5 reported a package that includes hard compromises on acid rain and air toxics, but leaves unresolved questions on such crucial areas as permits and enforcement. A six-page *Environmental Policy Alert* Special Report analyzes the key acid rain provisions and offers a title-by-title review of the House bill's major components.

Agreement on acid rain, long the sticking point in committee clean air deliberations, removed the last obstacle to full floor consideration. This Special Report takes apart the compromise that allowed both cost-sharing advocates and opponents to claim victory and sign off on the landmark agreement. The plan gives extra allowance credits to facilities that reduce emissions of acid rain precursors through scrubbing but also lowers the emission rate that these dirty plants must meet.

Each title of the emerging House bill would require EPA to issue new regulations and require industry to dramatically alter business practices. From tighter nonattainment standards to new controls on mobile sources, *Environmental Policy Alert* examines the changes likely to result from the reauthorized Clean Air Act.

ould determine if the new policy would result in lower proposed penalties, and if so, the complaint may be amended to assess the lower penalties. The new policy is to apply to all cases issued on or after April 9, regardless of the date of the violation.

To determine the gravity based penalty, the following factors are considered: the nature of the violation; the extent of potential or actual environmental harm from a given violation; and the circumstances of the violation. Once the first stage is established, upward or downward adjustments may be made in consideration of the following factors, either before issuance of a civil administrative complaint or during settlement negotiations: culpability; history of such violations; ability to pay; ability to continue in business; and "other matters as justice may require, such as environmentally beneficial expenditures."

The new policy is designed to incorporate the "enforcement-related provisions" of all PCB rules and policy revisions to date, and all future applicable rules. Since developing the 1980 interim guidance, numerous PCB regulations have been

promulgated by EPA, including regulations for use in closed and controlled waste manufacturing processes, various use authorizations, incidental generation, and, most recently, the notification and manifesting of PCB waste activities, explained the new policy. Amendments, interpretations and revisions to the interim guidance have also been developed.

Considered a "major undertaking" by EPA officials, revision of the 1980 policy involved regional offices in New York and Seattle, WA and intervention by headquarters officials Assistant Administrator Linda Fisher and Deputy Assistant Administrator Vic Kimm, according to a letter sent to the concerned parties.

Information about the new policy will be available through the TSCA Hotline at (202) 554-1404.

### **PENALTIES — EPA judicial officer cuts fine in first use of individual income limit**

A \$35,000 fine for the illegal disposal and storage of polychlorinated biphenyls has been reduced to \$1,465 by the EPA Judicial Officer on a first-time finding that EPA's PCB penalty policy, which establishes a 4-percent limit of revenues of existing businesses for establishing penalty amounts, could apply to individuals.

EPA's Region IV had sought a fine of \$2-million from S.E.D. Inc. and its owner James Caldwell, as an individual, for the illegal disposal of over 1-million pounds of liquid PCBs. The fine, set at \$35,000 by the presiding administrative law judge, was reduced in appeal to the significantly smaller amount equal to 4 percent of Caldwell's annual income. Caldwell claimed that he no longer owned any of the funds collected by S.E.D.

S.E.D. and Caldwell had abandoned a storage warehouse full of the toxic substance in North Carolina in 1985, according to the agency. EPA negotiated with the opposing parties for voluntary disposal of the PCBs and then sought a fine under TSCA for the violations.

## Federal Alert— new regulations

*This listing highlights regulations as published in the Federal Register from Nov. 4, 1985, to Dec. 31, 1985. Complete information is available on the appropriate page number.*

### PROPOSED

**Environmental Protection Agency**—Recommends maximum containment levels in water for variety of synthetic organic chemicals, inorganic chemicals, and microorganisms; comments by March 13 (Nov. 13, 1985, page 46936).

**Food & Drug Administration**—Requires warning statement on all prescription drugs for human use that contain sulfites; comments by Jan. 21 (Nov. 19, 1985, page 47558).

Requires warning label on aspirin products detailing possible connection of aspirin to Reye's syndrome; comments by Jan. 15 (Dec. 17, 1985, page 51400).

**Nuclear Regulatory Commission**—Revises rules for protection of individuals exposed to ionizing radiation at NRC-licensed facilities; comments by April 21 (Dec. 20, 1985, page 51992).

**Occupational Safety & Health Administration**—Restricts work place exposure to formaldehyde to as low as 1 ppm averaged over eight hours; comments by March 10 (Dec. 10, 1985, page 50412).

Reduces worker exposure limits for benzene from current 10 ppm to 1 ppm averaged over eight hours; comments by Feb. 14 (Dec. 10, 1985, page 50512).

### FINAL

**Environmental Protection Agency**—Raises permitted level of fluoride in drinking water to 4 mg per L; effective Dec. 16, 1985 (Nov. 14, 1985, page 47142).

Amends Resource Conservation & Recovery Act hazardous waste definition to include mixtures in which solvent concentration is 10% or greater; effective Jan. 30 (Dec. 31, 1985, page 53315).

### NOTICES

**Environmental Protection Agency**—Approves experimental use permits for field tests of genetically altered bacteria on strawberry blossoms (Dec. 4, 1985, page 49760).

Announces availability of plan for developing strategies for emergency handling of accidental releases of acutely toxic chemicals; comments by March 17 (Dec. 17, 1985, page 51451).

**National Science Foundation**—Solicits proposals from universities for grants to develop programs to strengthen math and science teaching in middle schools; proposals by May 2 (Nov. 5, 1985, page 45952).

ment for the National Center for Chemical Research at Columbia University.

- \$8.5 million for the second installment on the Supercomputer Center at Florida State University.

- \$8.5 million for the second installment on the Advanced Science Center at the University of Oregon.

In addition, DOE's energy conservation budget provides \$10.3 million for the basic industries research facility at Northwestern University.

In the Department of Agriculture's research programs, Congress really gets down to the nitty gritty and has done so for years. Among the numerous add-ons and earmarks in those budgets are \$50,000 for sunflower germplasm research at South Dakota State University; \$50,000 for a feasibility study of an agricultural science and industry facility at Pennsylvania State University; \$100,000 for maple research at the University of Vermont; \$200,000 for potato research at North Dakota State Uni-

versity; \$250,000 for water conservation research at Texas Tech University; \$300,000 for milk consumption research at Penn State; \$340,000 for tri-fly research at the University of Hawaii; and \$500,000 for planning of a critical agricultural materials research facility by the Polymer Institute of the University of Southern Mississippi.

The list goes on. Specifically mentioned in the Department of Interior's fiscal 1986 budget is \$2.2 million for respirable dust research at Massachusetts Institute of Technology, Penn State, University of Minnesota, and West Virginia University; \$750,000 for groundwater research at the Oregon Graduate Center; and \$300,000 for a coal mine injury analysis study at Penn State. And the National Institutes of Health's budget contains \$4.5 million for construction of the Mary Babb Randolph Cancer Center at West Virginia University.

*Janice Long, Washington*

## Hazardous waste cleanup firm makes progress

**Clean Sites Inc. (CSI)**, the privately supported organization that is trying to help expedite cleanup of hazardous waste sites, has made some strong progress in the past few months, including what may be record fast action on a site in North Carolina.

An update of CSI's activities was recently presented by its president, Charles W. Powers, and other officers of the company in conjunction with the first full cleanup contract the organization arranged. That was at the SED Inc. waste site in Greensboro, N.C., where SED's owner had been collecting transformers and capacitors from utility companies, draining the polychlorinated biphenyls from them, and selling the containers as scrap. According to Powers, SED's owner told state and federal officials last year that he would not be able to continue and that the PCBs in his warehouse would be abandoned.

CSI apparently was called in soon after, and Powers says that it has taken only six months for the organization to bring together nearly 185 responsible parties and get them

to agree on paying for cleanup of the more than 6 million lb of PCBs left at the site. Powers notes that the site was not on the Superfund national priority list, but, because of its size, it was a prime candidate for the list. The quick action prevented what could have become a serious problem, he says.

At this time, Powers says, CSI is working on 36 hazardous waste sites in 20 locations. It has been instrumental in completing three site agreements and has five more pending. As CSI builds a reputation of independence and competence in negotiations, Powers expects the company to become even more active.

Financing at CSI has been a worry. However, two private foundations—the William & Flora Hewlett Foundation and the Andrew W. Mellon Foundation—are making grants for more than \$1.3 million over the next three years, Powers says. He hopes that this will help convince more private groups to fund CSI. Current spending is about \$2.4 million a year.

*David Hanson, Washington*



**THE PCB FULL SERVICE COMPANY**

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## PCB HANDLING

The extra measures of safety built into our methods of PCB handling are important to us. We will NOT ship or accept shipment of liquid PCBs in bulk or in loose drums. We will NOT store PCBs in bulk or in drums in a large diked area which will only hold the required 25 percent of the liquid stored. We will only store PCB's in drums in diked modular units which will hold the entire contents of all drums. Our record to date is that we have NEVER had a spill. We want to keep it that way!

### a. on site

The SARASPAC PCB portable warehouse holds four 55 gallon drums and meets all of the criteria for a PCB storage area except for the requirement that PCBs be stored above the 100 year flood elevation. It is a diked, non-drained area with an impervious floor. It has a roof and walls to protect the contents from the elements. It has the added advantage of having two battery powered liquid sensing alarms to provide warning if there is free liquid within the base of the SARASPAC and external to the drums.

This concept permits a PCB owner to create needed storage space on a modular basis as required. It also permits the transfer of PCBs from one part of a facility to another with maximum safety.

Several types of SARASPACs are available, including the SARASPAC-E emergency environmental protection kit, which contains the materials and storage capability commonly needed in the event of a PCB spill or leak.

b. in transit

The potential for a major PCB spill, with all of its environmental hazard, cleanup cost, and adverse publicity, makes shipping PCBs in bulk unthinkable to many companies. Even shipment of liquid PCBs in proper DOT drums poses some environmental risk because of the very real possibility of an occasional drum leak spreading PCBs across the highways as the truck rolls.

The SARASPAC system virtually eliminates these risks by adding the extra measure of safety inherent in shipping material in its own diked warehouse.

The SARASPAC design requires that drums be offset from a square configuration, providing additional impact protection in the event of an accident.

c. in storage

Storage at SED facilities is indoors in storage bases which contain a maximum of four 55 gallon drums. Each base will contain all of the liquid in all four drums if they should develop simultaneous leaks. The effect is the same as having a series of small modular warehouses, each containing a maximum of four drums. All movement of drums within the facility is in SARASPACs or storage bases.

Each storage base contains two separate liquid sensing switches which are connected in series to an electronic security system, which monitors three separate circuits 24 hours per day, seven days per week, on a year round basis. The three circuits are the leak detection circuit mentioned above, an intrusion detection system, and a fire detection system. When the facility is not manned, the alarm system is monitored by a company specializing in 24 hour surveillance.

In order to assure fulfillment of our obligations to our customers and the environment, we have structured a system which guarantees our financial responsibility. For every pound of PCB material placed into storage by us (including drum weight), we place

\$0.26 in a bank administered escrow fund. That money cannot be released until proper disposition of the material has occurred. A copy of our escrow agreement is attached. This voluntary assurance of financial responsibility is further evidence of our sincere concern for proper management of the environment.

## PCB DISPOSITION

Since its formation, SED, Inc. has maintained development and engineering activities to ensure the creation of recycling and recovery processes for the PCB contaminated materials which we are acquiring in inventory. Each of the subsystems is designed to perform a specific separation, treatment, or processing function required of it. Each is required to first meet the dual criteria of inherent safety and risk limitation which are basic to our corporation. Meeting these criteria is assured by faithful adherence to the following design constraints:

1. The total process stream shall be broken into independent (batch) segments with limited fluid quantity in each segment.
2. Operation shall result in zero effluents escaping from the system.
3. Failure modes and off-specification operation shall be constrained to eliminate significant effluents from being released in the event of such adversities.
4. All systems and processes shall be integrated to provide the maximum recovery of material resources and a minimum expenditure of energy.

5. All processes shall be conducted at temperatures and pressures as near ambient as practicable, to maximize process stability process and minimize need for sophisticated (unreliable) controls. No combustion or other irreversible reactions shall be utilized.
6. Only proven technology shall be applied; although no requirement shall be imposed that the technology be proven in the context of PCB processing.
7. No water discharge shall be required for cooling of any process or product.
8. Each sub-system shall be installed in a non-drained container, sized to hold the entire contents of the batch being processed in the event of equipment failure. This criterion also applies to the holding tanks associated with each of the various sub-systems.
9. The result (product) of each stage, including the final processing steps, shall be held separately in until analysis can verify the adequacy of the processing for the needs of the next process stage or the sale of the product as PCB free material.

The attention to safety, reliability, and physical responsibility, which we believe characterizes our corporation, can be seen in the design constraints

outlined above. Our attention to the regulatory requirements of the federal and state governments, and the reflection of that attention in the engineering and processing plans, is not so obvious.

Each of our processing systems is designed to produce a product, or interim product, which can be sold or converted into a saleable product. Each is designed to prevent effluents. In the strictest sense, no net dilution of PCB occurs.

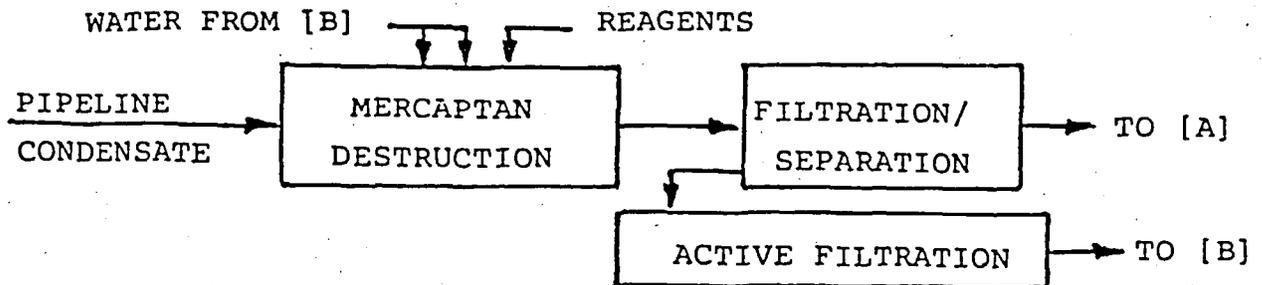
The separation processes are physical - chemical concentration processes in which non-PCB materials are separated from PCB materials. There are two instances where non-PCB materials are temporarily added to PCB contaminated materials, neither of which violates the letter or spirit of the EPA prohibition of dilution to obtain reclassification of the PCB materials or the PCB contaminated materials. The first example is the use of liquid/liquid extraction techniques which depend upon the continuous recirculation of a solvent which is undergoing a continuous contamination-cleanup cycle. The second example is the use of solvent in the extraction of PCBs from shredded capacitor pieces. This solvent is also continuously cycled to remove the PCBs from it, and then reused.

The processes are outlined below in a form which identifies the separation of stages and equipment in compliance with the constraints discussed above. Each diagram represents one or more sets of equipment used for a single starting composition.

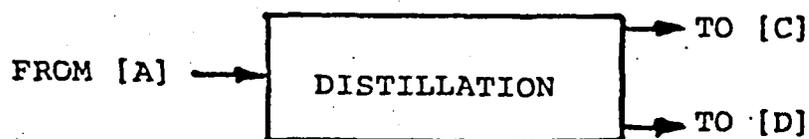
RECYCLING

SEPARATION

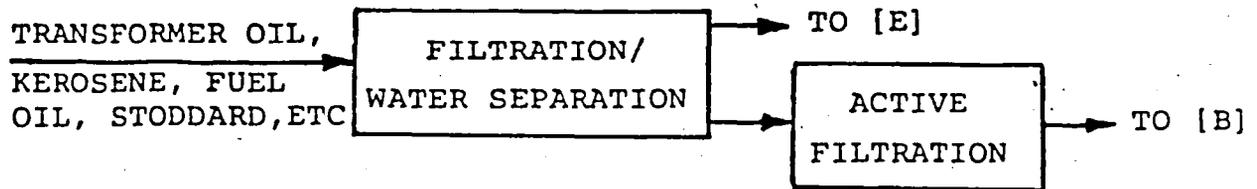
1. Natural gas pipeline concentrate is typically accompanied by quantities of dirt and water. It always contains significant concentrations of methyl mercaptan. First, these are removed/reacted to prevent interference with separation first. PCB contaminated light oil ( $C_8$  to  $C_{19}$ ) is stored in [A]. Clean water is stored in [B].



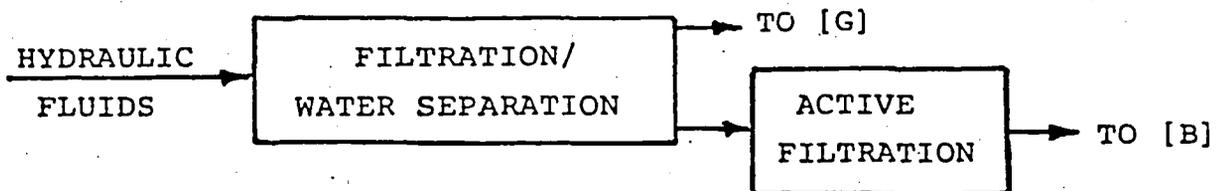
2. The light oil in [A] is separated into a PCB-free fraction, containing virtually all of the material with less than fourteen carbon atoms per molecule, ( $C_{14}$ ) and a residual which contains the degradation products of the mercaptan destruction and the concentrated PCBs. The light ends, about eighty-five percent of the total, are stored for later use and sale in [C]. The "bottoms" are stored for further processing in [D].



3. Contaminated oils from transformers and transformer disposal (such as kerosene and fuel oil) are dried before separation. The dry oils are stored in [E]. Clean water is stored after testing in [B].

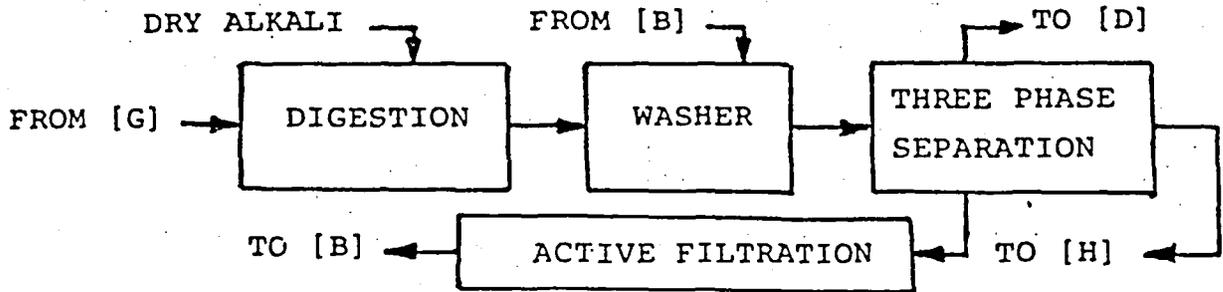


4. PCB contaminated hydraulic fluids typically contain much water and sludge. These interfere with further processing and prevent proper classification, and are removed. The clean water is tested and stored in [B].

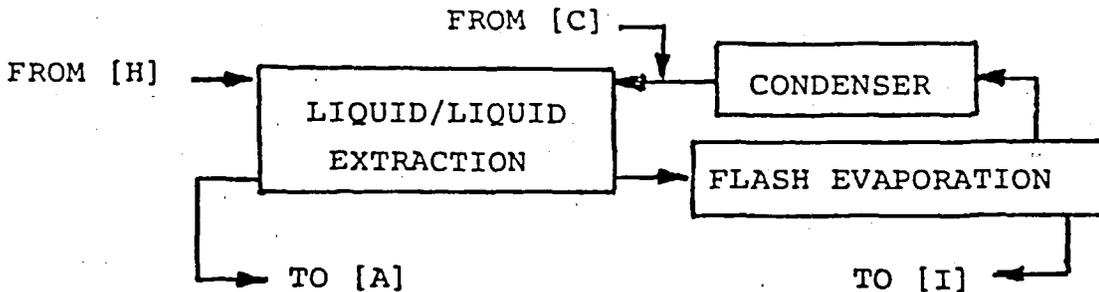


5. The dry, dirt-free hydraulic fluids, stored in [G], are treated with dry alkali to digest the coupling agents used to keep the oil and ester fluids in solution. After rinsing with water, three phases are separated; PCB-contaminated oil, water-emulsion, and PCB-contaminated ester. The water is filtered, cleaned and returned to [B].

The contaminated oil and ester fluids are stored for testing and further processing in [D] and [H], respectively.

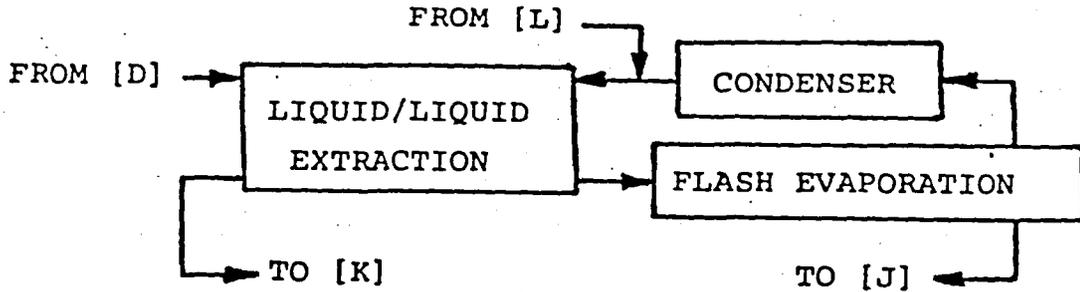


6. The PCB-contaminated ester fluid, no longer miscible with hydrocarbon oil, is subjected to clean light oils in a liquid-liquid extraction system. Here the PCBs and TCBS are transferred to the light oil for later removal in the second sub-system described. The clean esters are stored for test and sale in [I].

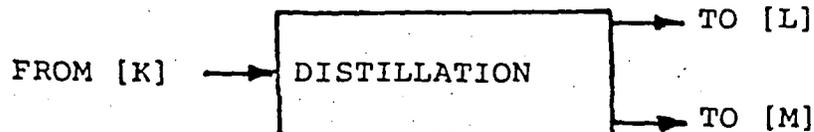


7. The hydrocarbon fraction obtained in sub-system five and the "bottoms" obtained in sub-system two have been stored in [D]. This sub-system is used to extract PCB and TCB from these oils and those stored in [E], at separate times. These PCB-contaminated oils are exposed to dry methanol in a liquid-liquid extractor. Methanol flow rate

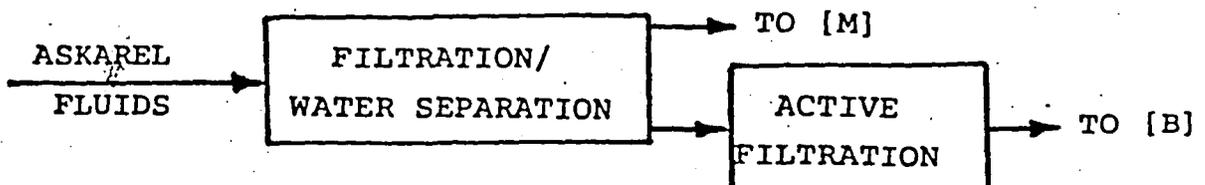
is five times the oil flow rate in this reactor. Entrained and dissolved methanol is flashed from the clean oil before storing for sale in [J].



8. Methanol is distilled from the PCB and TCB which it has acquired from the oils in sub-system seven. It is expected that little methanol will remain with the chlorinated materials which are stored in [M]. If necessary, water can be used to reduce the solubility of methanol in these materials while reducing their effective vapor pressures.



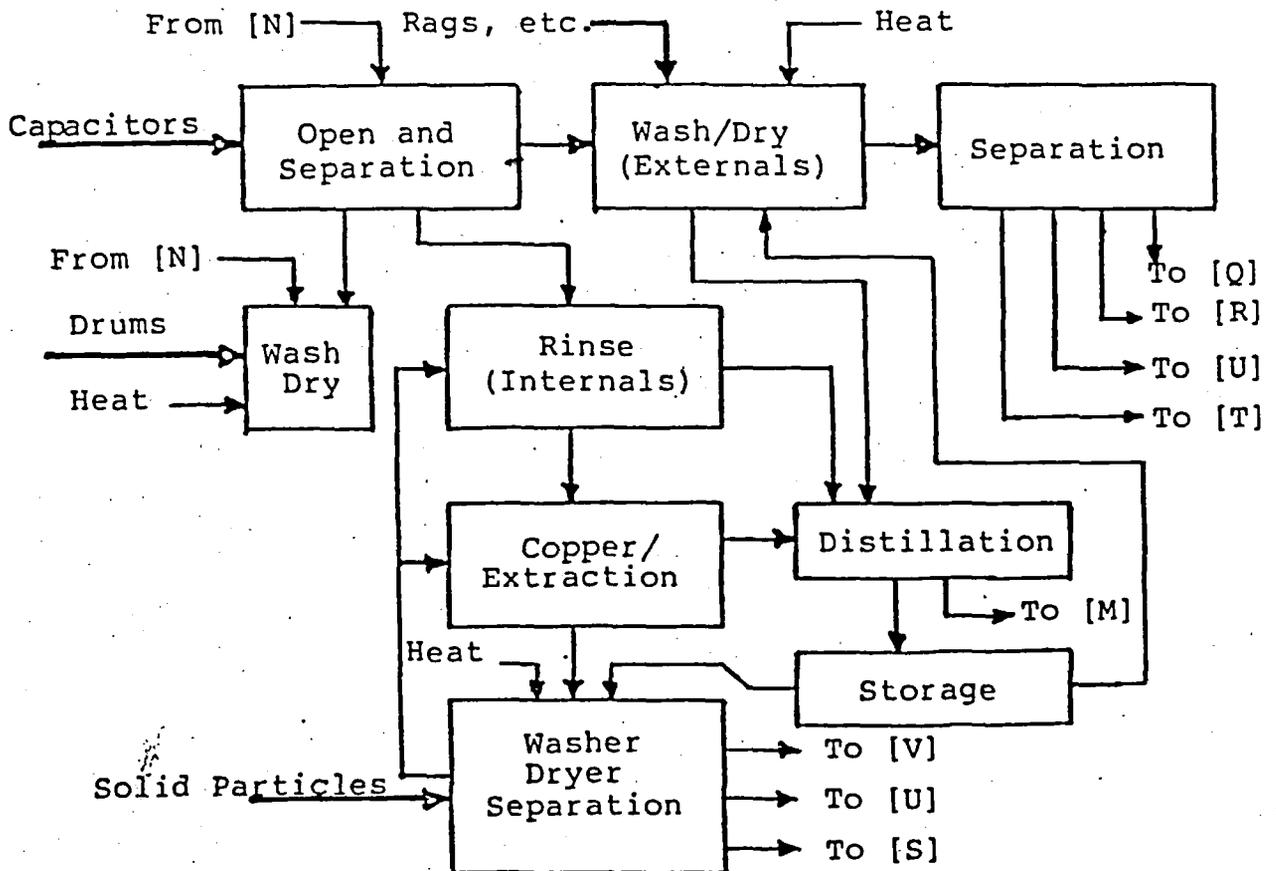
9. Typical transformer Askarels contain 30-40 percent chlorinated benzene and an epoxide scavenger. As we receive them, water and sludge is often present. The first step is to clean and dry the Askarels. They then are stored with those obtained in sub-system eight in [M].



10. The cleaned PCB-TCB solution is distilled. Most of the trichlorobenzene is recovered by distillation and stored in [N] for testing, reuse, and sale. The remaining TCB and PCB materials are stored for dechlorination in [P].



11. PCB capacitors provide a major disposition problem to our customers, as do other PCB-contaminated solids (such as rags and oil-dry) created in clean-up and removal operations. PCB solid waste, such as filters, created in



the above sub-systems are, processed here.

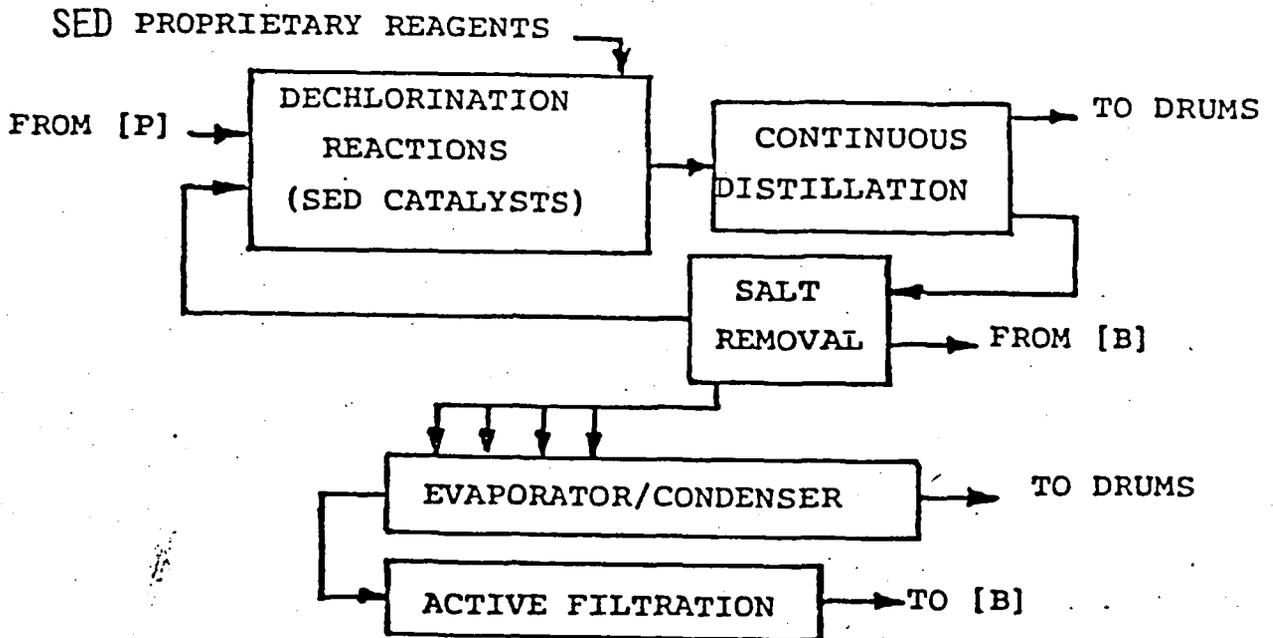
Capacitors are opened, separated, and chopped as needed to assure complete exposure clean solvent with minimal diffusion resistance. PCBs are then removed (along with TCB) in a series of washes and solvent extractions, using "SED solvent". The solvent is continuously reclaimed.

PCB liquids (syrup) are rinsed from the pieces with trichlorobenzene before entering the extractor, and stored in [M]. Steel, copper, aluminum, ceramics, plastics and other non-metals are separated and stored for test and final disposition as non-PCB materials in [Q], [R], [S], [T], [U] and [V] respectively.

These eleven systems provide a concentrated PCB feedstock for dechlorination and an array of non-PCB products for use and sale.

DECHLORINATION

12. Alkali-metal reactions on chlorinated hydrocarbons have been used since before the invention of PCB in the quantitative analysis of degree-of-chlorination. It is not unexpected that this "old art" would be considered for PCB destruction. The key to commercial application of this technology is the avoidance of polymerization, thus enabling the recycling of materials which are not fully dechlorinated. We must apologize for not revealing the reagents which accomplish this; we have not satisfactorily secured our legal position at this time. Therefore, it must suffice that these materials will be converted to liquid specialty chemicals for sale, with purified salts as a by-product.



## RECORD KEEPING

While PCBs are exclusively regulated by TSCA, the RCRA record keeping systems are becoming better understood by generators. For this reason, we voluntarily have adopted the basics of the RCRA system, in addition to meeting the TSCA PCB record keeping requirements.

We started using a manifest system on the first shipment of PCBs ever received by SED, Inc., well before the publication of RCRA proposed rules. Every shipment ever received by SED at a storage facility has been manifested. All transportation of PCBs has been done either by our own trucks or by other licensed hazardous waste haulers.

On receipt at a storage facility, each SARASPAC is opened, the individual drums and their contents weighed, and the drums inspected to assure that they are the proper DOT type. The drums are then placed into storage in units of four, in storage bases. The SED order number on which the SARASPACs were originally shipped is noted in the facility log book along with the date received, the date weighed, and the specific

weights per drum. In addition, a label is placed on each drum showing the weight and the date placed into storage.

An annual report is made available to the U.S. EPA, as required by TSCA, showing each receipt, each transfer, and a summary showing totals for the year, both in and out.

All log books and manifests are kept as permanent records.

## HISTORY OF PCBs

Polychlorinated biphenyls (PCBs) were first synthesized in 1881. They were not manufactured on a commercial scale until 1929.

PCBs are man-made chemical compounds composed of carbon, hydrogen and chlorine. In commercial use PCBs are a clear, viscous substance similar in appearance to baby oil. PCB are non-corroding, non-flammable, have a low vapor pressure and low water solubility. These and other characteristics such as excellent insulating and thermal properties have contributed to their widespread use. Many of the same characteristics which made PCBs ideal in a universal way makes them potentially undesirable from an environmental standpoint.

Most of the PCBs in the U.S. were manufactured by Monsanto Industrial Chemical Company. PCBs were not generally recognized as an environmental problem until about 1968.

In 1972 Monsanto voluntarily restricted the sale of PCBs to manufacturers of electrical transformers. Monsanto ceased manufacturing PCBs in mid 1977 and shipped the last remaining inventory by October 31, 1977.

Following Monsanto's action in 1972, the only U.S. production of PCBs for "open" systems use was Geneva Industries which manufactured about one million pounds of PCB based heat transfer liquid between 1972 and 1974. PCBs were also imported after 1972 for use in maintaining electric motors in certain coal mining machines, and for use in some types of casting waxes.

Small quantities of PCBs are being produced, currently, as unintentional byproducts of other chemical processes. Similarly, chlorination of water which contains appreciable concentrations of biphenyl can result in the unintentional formation of PCBs.

In 1973, the U.S. Food and Drug Administration (FDA) established temporary tolerances for PCBs in food. By 1973 there was significant evidence of PCBs in industrial effluents and in the environment, and reports of PCB contamination were being featured in the non-technical press.

Prior to the enactment of the Toxic Substances Control Act (TSCA), the authority of the EPA, with respect to PCBs, was limited to the regulation of contaminated water from point sources. EPA promulgated a rule under Section 307(a) of the Clean Water Act on February 2, 1977 (42 FR 6532-6556), which banned the discharge of PCBs into navigable waters by electrical transformer and capacitor manufacturers.

On March 26, 1976, Senator Gaylord Nelson of Wisconsin introduced into the Senate an amendment to the Toxic Substance Control Act (TSCA) that required the eventual elimination of the use of PCBs in the United States. This amendment was the basis of Section 6(e) of TSCA, and the eventual ban on the manufacture of PCBs became a legislated requirement on October 11, 1976, when TSCA was signed into law.

Section 6(e) of this law requires EPA to establish rules to: (1) govern the disposal and marking of PCBs; and (2) prohibit, with certain exceptions, the manufacture, processing, distribution in commerce, and non-totally enclosed use of PCBs.

Final Marking and Disposal Rules appeared in the Federal Register on February 17, 1978 (clarifying amendments to this Rule appeared in the August 2, 1978 Federal Register).

On June 7, 1978, the Proposed PCB Ban Rule was published in the Federal Register. The Final PCB Ban Rule appeared in the Federal Register on May 31, 1979; this Rule supersedes the February 17, 1978 PCB regulation and took effect on July 2, 1979.

May 9, 1980 EPA proposed to amend the Final PCB Regulation to prohibit the use of PCB Items in facilities manufacturing, processing, or storing fertilizers or agricultural pesticides. FDA and USDA has published similar proposals to cover the entire food and feed chain.

## PCB DEFINITIONS

### Chemical Definition

The term PCBs is short for Polychlorinated Biphenyls. PCBs belong to a broad family of organic chemicals known as chlorinated hydrocarbons, appearing as heavy oil-like materials and ranging from clear to almost black in color. PCBs are produced by attaching two or more chlorine atoms to a biphenyl molecule.

PCBs are a man-made chemical compound composed primarily of carbon, hydrogen and chlorine. In commercial use PCBs are a clear, viscous substance similar in appearance to baby oil. PCBs are non-corroding, non-flammable and have a low vapor pressure oil and low water solubility.

Regulators Definition. TSCA 44 FR 31544 761.2 (s)

"PCB" and "PCBs" means any chemical substance that is limited to the biphenyl molecule that has been chlorinated to varying degrees or any combination of substances which contains such substance.

USE (OR APPLICATIONS)

The primary uses of PCBs have been in electrical transformers, capacitors, heat transfer systems and hydraulic systems. PCBs were not manufactured on a commercial scale until 1929. Since that time, however, many applications have been developed. These include use in:

waxes	Caulking compounds
printing inks	adhesives
paints	sealants
heat exchange	dedusting agents
pesticides	fluids
vacuum pump	specialized lubricants
cutting oils	oil
carbonless copy paper	

and electrical transformers, capacitors, and switchgear.

They are found in air conditioning units, television sets, microwave ovens, fluorescent lighting fixtures and a wide variety of other open systems. Since their development in 1929, hundreds of millions of pounds of PCBs have been used. Most of the PCBs marketed in the United States are still in service, primarily in electrical equipment.

TRADE NAMES PCB'S SOLD UNDER

PCB liquid used in electrical equipment is referred to as "askarel", which is a mixture of PCB's, chlorinated benzenes and trace contaminants. (Askarel is the generic name used for nonflammable insulating liquid transformers and capacitors). PCBs were sold by manufacturerers under a variety of trade names, including:

Arochlor	Clorphen	Hyvol	Pyralene
Arochlor	Diachlor	Inerteen	Pyranol
Arochlor B	Dykanol	Kennechlor	Pyrochlor
Chlorextol	Elemex	No-Flamol	Saf-T-Kuhl
Clophen	Eucarel	Phenochlor	Santotherm
Clorinol	Fenchlor	Pydraul	Therminol

The most common names you will see are Inerteen and Pyranol.

## SCIENTISTS FIRST

SED, Inc. was founded by researchers and engineers from the transformer and dielectric fluids industries who were, and still are, committed to innovative application of proven technologies to the polychlorinated biphenyl (PCB) problem.

Conventional approaches to PCB disposal such as landfill and incineration were rejected in favor of closed physical and chemical processes which permit the recycling and reuse of all contaminated materials with no discharge of PCBs into the environment.

Since its incorporation in 1979, all of SED's activities have been dedicated to these principles.

At SED, Inc. we constantly strive to increase safety by employing:

- Best business practices.
- Best available technology through sound scientific and engineering principles.
- Concentrated efforts to upgrade existing technology.
- Innovation in technological development.

## FINANCIAL RESPONSIBILITY

From its very beginning, before the existence of adequate legal safeguards to assure the financial responsibility of companies dealing with PCBs, SED structured a system which guarantees financial responsibility. Funds are placed in a bank-administered escrow account for each pound of PCB and PCB contaminated material placed into storage. This money cannot be released, except to the US EPA, until proper disposition of the material has occurred. In addition, SED carries not only normal business liability insurance, but also special environmental impairment liability insurance. This insurance covers all storage, treatment and transportation operations of the company, with limits that substantially exceed all proposed insurance requirements.

## THE PCB FULL SERVICE COMPANY

SED is a Wisconsin chartered corporation and is licensed as a "PCB Full Service Contractor" under Wisconsin Law (NR 157.05). This permits SED to "accept ownership and responsibility for PCBs, from a generator for transportation, servicing, or processing of PCBs or products containing PCBs for disposal." With our "cradle to cradle" concept we accept ownership and responsibility for the PCBs on your premises, transport them in a safe manner to one of our regional storage depots, store and classify them in a manner exceeding all Federal and State requirements, and ultimately separate, detoxify, and recycle all of the materials.

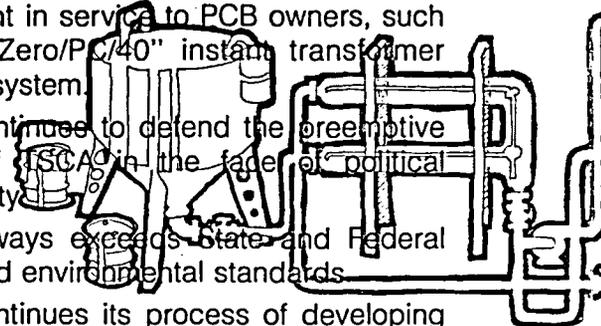
## REGULATIONS

The founders of SED have been directly involved in the development of State and Federal PCB regulations since 1976. The company is dedicated to meeting and exceeding all existing regulatory requirements and technical safety standards relating to the transportation, storage, processing and recycling of PCBs.

Our Regulatory Affairs Department continually interfaces with the regulatory community to assure not only our continuing legal and safe operations but also our ability to meet or exceed proposed future regulations.

## A LITTLE EXTRA

- SED consults and advises government and industry on PCB problems, excepting only the area of legal advice.
- SED actively supports rational PCB regulations as it and its founders have since 1976.
- SED develops and licenses technology and equipment in service to PCB owners, such as the "Zero/PC/40" instant transformer cleanup system.
- SED continues to defend the preemptive power of RSCAG in the face of political uncertainty.
- SED always exceeds State and Federal safety and environmental standards.
- SED continues its process of developing regional service facilities with sites in three more states to be announced.
- SED depends upon science, not luck, to perform its services and fulfill its obligations.



## SAFE AND LEGAL PCB STORAGE

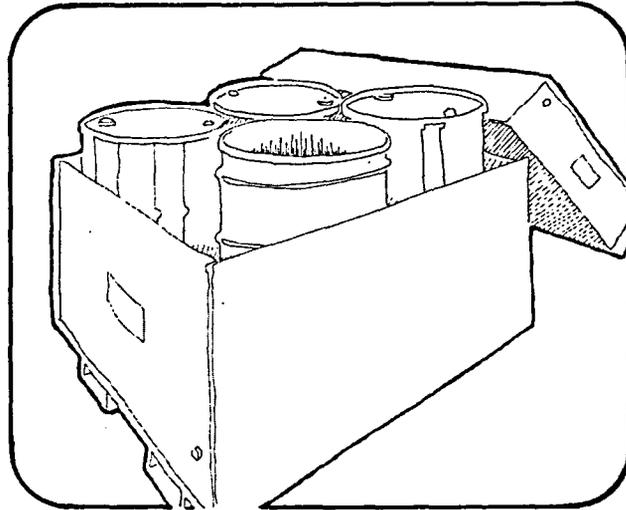
The unique Safe Askarel Removal And Storage PACKAGE, SARASPAC (patent pending), is a palletized steel container which, by itself, meets all the US EPA requirements for a diked and covered PCB warehouse, provided the stored material is in proper DOT drums and the unit is located above the 100 year flood elevation. Each SARASPAC contains two float actuated, battery powered alarms to warn of any free liquid within. Each SARASPAC will hold four 55 gallon drums.

### SARASPAC TYPES

SARASPAC warehouses are manufactured only by SED. They are supplied with or without drums. They are available with drums in all combinations of closed top "liquid" and open top "solid" drums. All drums supplied in SARASPACs are EPA and DOT approved for PCBs. They are sealed and have EPA required PCB labels.

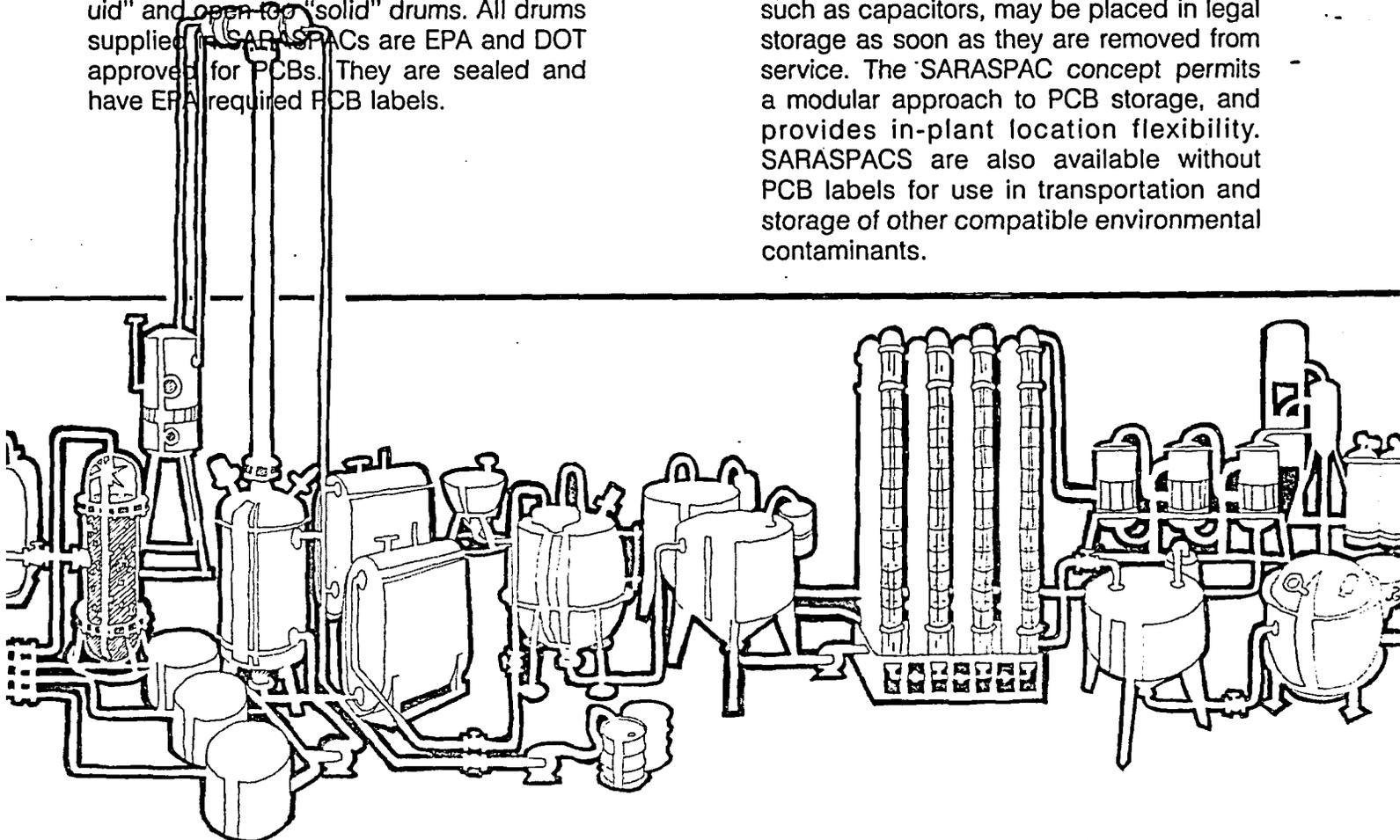
## IN TRANSIT

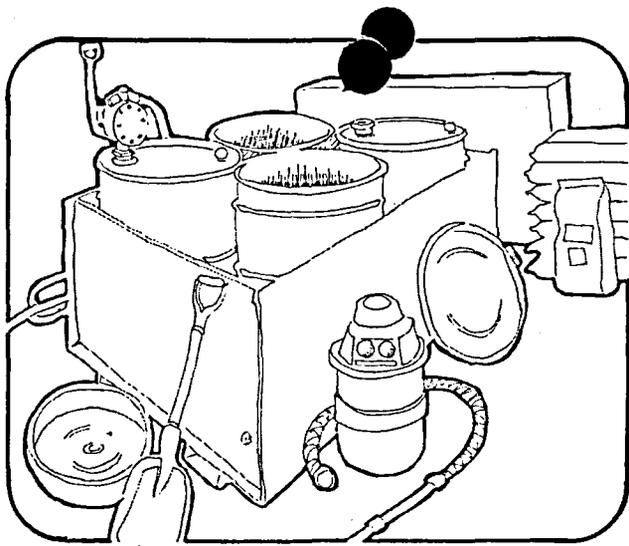
The potential for a major PCB spill, with all of its cleanup cost and adverse publicity, makes shipping PCBs in bulk unthinkable to many companies. Shipment of liquid PCBs in proper DOT drums does not eliminate the risk of drum failure. The SARASPAC system virtually eliminates these risks by adding extra measures of safety. The design even requires that drums be offset from a square configuration to provide additional impact protection in the event of an accident.



### IN YOUR PLANT

A SARASPAC warehouse provides immediate safe and legal storage for PCBs. Both liquids and solids, such as capacitors, may be placed in legal storage as soon as they are removed from service. The SARASPAC concept permits a modular approach to PCB storage, and provides in-plant location flexibility. SARASPACs are also available without PCB labels for use in transportation and storage of other compatible environmental contaminants.





### SARASPAC-E

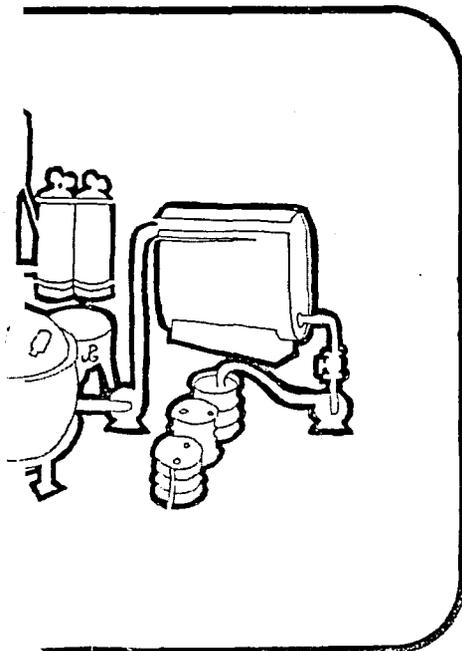
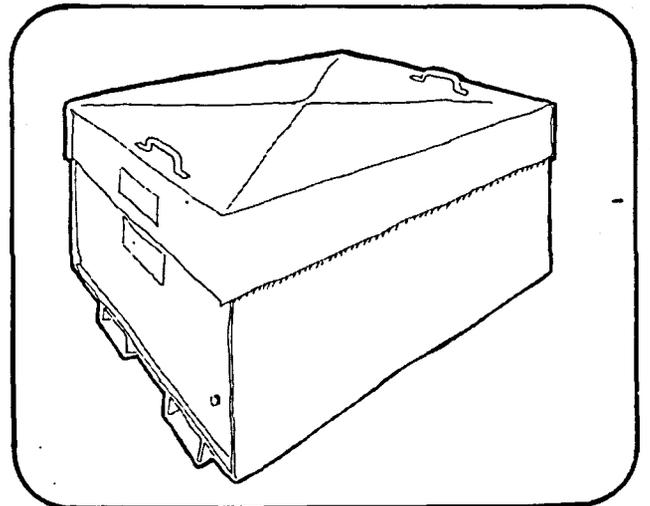
For Quick Emergency Response: The SARASPAC-E Emergency Environmental Protection Kit is designed to enable you to respond quickly to PCB spills or leaks. A strategically placed SARASPAC-E can be rushed to any trouble spot by fork lift truck and contains the material and equipment needed to properly handle PCB or similar spill emergencies.

### SED TRANSPORTATION

SED arranges pickup at your site of all PCB materials, utilizing either an SED truck or another licensed hazardous waste hauler, and transports the materials to one of our regional facilities. Liquid PCBs must be in proper drums in SARASPAC units, virtually eliminating the risk of a PCB spill in transit. Solid PCBs must be in proper containers.

### SED STORAGE

PCB materials are temporarily stored and classified for recycling at SED regional facilities. This storage is in modular diked units holding four 55 gallon drums each. Our security system continually monitors for potential leaks, intrusion and fire. The modular storage system eliminates the possibility of a catastrophic release of PCBs into the environment.



For additional information call our Marketing Department at: (414) 784-3740 or

Come see us at:

SED, Inc.  
Marketing Dept.  
2323-K Bluemound Road  
Waukesha, Wisconsin 53186

or Write to us at:

SED, Inc.  
Marketing Dept.  
P.O. Box 1306  
Waukesha, Wisconsin 53186

## PCB LIQUIDS

PCB liquids recycled by SED may contain chlorinated benzenes or may be PCB-contaminated hydrocarbon solvents, transformer oil, hydraulic fluid, or heat transfer fluid. PCB liquids containing other hazardous chemicals may be handled by SED with specific authorization.

## INHERENTLY SAFE TREATMENT

SED requires that its recycling systems be designed for maximum inherent safety by segregating the processes into independent stages. Each stage operates on small batches of known material at low temperatures and pressures. No material is permitted to be discharged into the environment. Each stage is installed in a non-drained container, sized to hold the entire batch. All operations are carefully monitored and all batches are tested between treatment stages.

## PCB SOLIDS

SED will recycle capacitors and other PCB solids such as rags, oil dry, etc. Except for large PCB capacitors, most of this material may be buried in chemical waste landfills. However, SED recognizes that some generators may prefer to have this material totally recycled and, therefore, as an accommodation to those customers, will handle any type of PCB solid material.

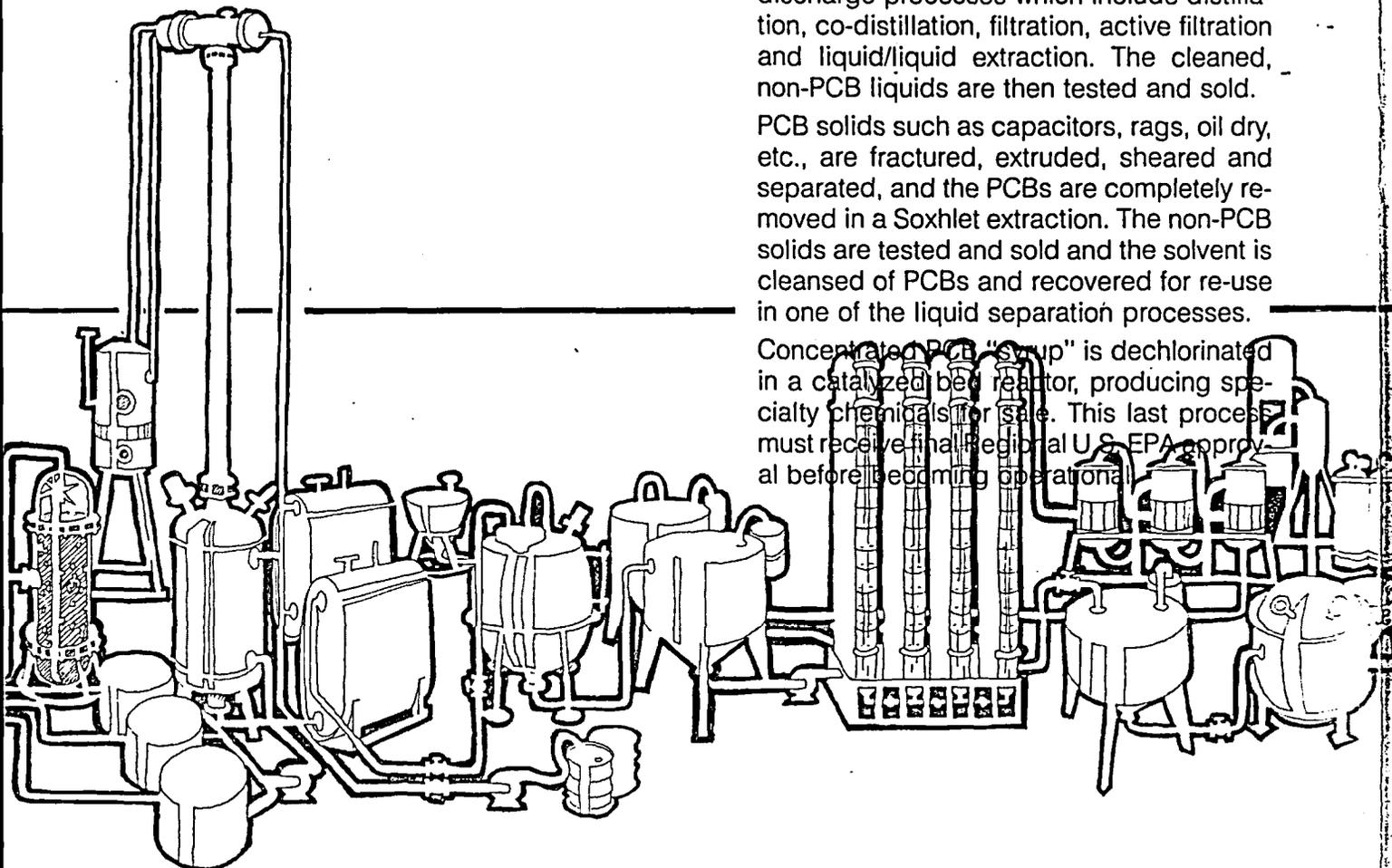
## RECYCLING

A series of separation/concentration processes remove PCBs from the materials which they have contaminated, leaving PCB-clean solvents, oils, hydraulic fluids, paper, metal, etc., which are completely recoverable and saleable. The U.S. EPA has granted SED permission to operate these separation/concentration processes under 40 CFR 761.30 (c)(2).

PCB liquids pass through a series of zero-discharge processes which include distillation, co-distillation, filtration, active filtration and liquid/liquid extraction. The cleaned, non-PCB liquids are then tested and sold.

PCB solids such as capacitors, rags, oil dry, etc., are fractured, extruded, sheared and separated, and the PCBs are completely removed in a Soxhlet extraction. The non-PCB solids are tested and sold and the solvent is cleansed of PCBs and recovered for re-use in one of the liquid separation processes.

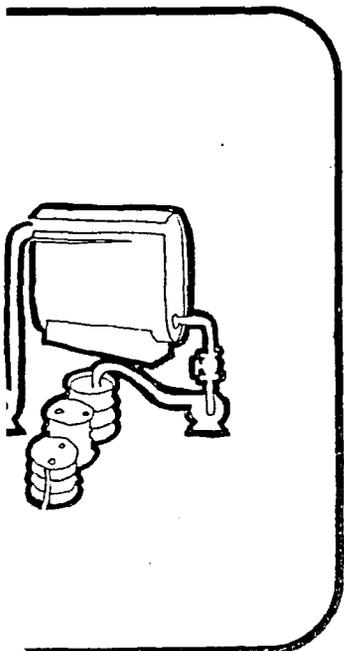
Concentrated PCB "syrup" is dechlorinated in a catalyzed bed reactor, producing specialty chemicals for sale. This last process must receive final Regional U.S. EPA approval before becoming operational.



**SED RECYCLES:**

- Transformer Askarels
- PCB contaminated transformer oils
- PCB contaminated hydraulic fluids
- PCB contaminated heat transfer fluids
- PCB capacitors
- PCB contaminated solvents
- PCB contaminated rags, oil dry, dirt

**SED, INC.**  
**PCB Full Service Co.**  
**2323-K Bluemound Road**  
**Waukesha, Wisconsin 53186**  
**(414) 784-3740**





North Carolina Department of Human Resources  
Division of Health Services  
P.O. Box 2091 • Raleigh, North Carolina 27602-2091

James G. Martin, Governor  
David T. Flaherty, Secretary

Ronald H. Levine, M.D., M.P.H.  
State Health Director

3 September 1987

Ms. Denise Smith  
EPA NC CERCLA Project Officer  
EPA Region IV Waste Division  
345 Courtland Street, N.E.  
Atlanta, GA 30365

Dear Ms. Smith:

SUBJECT: Preliminary Assessment Report  
SED, Inc. NC D980600449  
Greensboro, NC 27409

Submitted herewith is the Preliminary Assessment Report for the subject site. The priority for inspection is based on our review of the available data.

SED, Inc. was a PCB service company from Waukesha, Wisconsin that reclaimed oils and other materials from transformers and capacitors and from other PCB debris and waste. In 1981 the company rented two warehouses in Greensboro, NC and began receiving PCB contaminated materials. One warehouse, located at 500 Radar Road, is the subject of this assessment. The other warehouse, located on Swing Court, was similar in operation but is not presently on the ERRIS list.

In 1985 it became apparent that the company was insolvent and on 24 April 1985 an inspection of both warehouses was conducted by state and federal officials. Both warehouses were found to be filled with drums of PCB, old transformers, and old capacitors. In the latter part of 1985, US EPA conducted a clean-up of both sites using CERCLA authorization.

Although the site has been cleaned-up, there is no documentation of the process or of any post clean-up sampling. This information has been requested from US EPA, Region IV. The site has been assigned a LOW priority for inspection.

Ms. Denise Smith  
3 September 1987  
Page 2

On 3 September 1987, this Preliminary Assessment was reviewed by Glenn Ross of the NC Division of Environmental Management, Air Quality Section; by Vince Schneider of the NC Division of Environmental Management, Water Quality Section; and by other members of the NC CERCLA Unit.

If you have any questions, please call me at (919) 733-2801.

Sincerely,



Grover Nicholson, Geologist  
CERCLA Unit

Solid and Hazardous Waste Management Branch  
Environmental Health Section

GN/gn/0400b

PRELIMINARY ASSESSMENT DOCUMENTATION SHEET

SITE NAME SED INC  
 ID# NCD 980 600 449

Hours worked by GROVER NICHOLSON (Staff member)

Date Preliminary Assessment Completed 3 Sep 87 (Date mailed to EPA)

	DATE/YR	HRS./TA
<u>I. GATHERING SITE INFORMATION</u>		
	7/30	4
	7/31	8
<u>II. REVIEW &amp; EVALUATE DATA</u>		
	8/3	5 <sup>15</sup>
	8/6	2 <sup>30</sup>
	8/7	6 <sup>30</sup>
	8/10	2 <sup>30</sup>
<u>III. DRAFT PA REPORT</u>		
	9/2	1
	9/3	1
	9/4	2
	9/8	5
	9/9	0 <sup>45</sup>
<u>IV. SITE REVIEW MEETING</u>		
<u>V. SUPERVISOR REVIEW AND CONCURRENCE</u>		

Round off to nearest hour

TOTAL HOURS ON PA: 39

SITE NAME SED, Inc

ID# NCD 980 600 449

TELEPHONE CALLS (FOR PA OR SI DOCUMENTATION)

DATE TO/FROM (COMPANY) PERSON CONTACTED

7/30/87 Clean Sites Inc. Philip Laughton

## **Board of Directors**

The Clean Sites commitment to independence and quality is best exemplified by its Board of Directors:

**Russell E. Train**, Chairman of the Board  
President, World Wildlife Fund-U.S.  
Washington, D.C.

**Douglas M. Castle**  
Counsel to Wald, Harkrader & Ross  
Washington, D.C.

**Louis Fernandez**  
Chairman, Monsanto Company  
St. Louis, Missouri

**Sandra S. Gardebring**  
Chairwoman, Metropolitan Council  
St. Paul, Minnesota

**Edwin A. Gee**  
Chairman, International Paper Company  
New York, New York,

**Dr. Kennedy**  
Professor, Stanford University  
Stanford, California

**Joshua Lederberg**  
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New York, New York

**Charles W. Powers**  
President, Clean Sites, Incorporated  
Alexandria, Virginia

**William K. Reilly**  
President, The Conservation Foundation  
Washington, D.C.

**Henry B. Schacht**  
Chairman, Cummins Engine Company  
Columbus, Indiana

## **For more information, call or write:**

Robert SanGeorge  
Member, Office of Public Accountability  
Clean Sites, Incorporated  
1199 North Fairfax Street, Suite 400  
Alexandria, Virginia 22314

Telephone:  
703-683-8522

Business hours:  
Monday through Friday  
9:00 a.m. to 5:30 p.m., eastern time  
Recorded messages may be left at other times.

**CLEAN SITES INC**  
1199 NORTH FAIRFAX STREET  
ALEXANDRIA VIRGINIA 22314

# **CLEAN SITES INC**

**A non-profit, non-partisan  
organization to accelerate  
the cleanup of hazardous  
waste sites in America**



**C**lean Sites, Incorporated is an independent, non-profit corporation established to help accelerate the cleanup of abandoned hazardous waste sites that pose a potential threat to public health and the environment in every region of the United States.

This new organization is the product of 10 months of research and debate in 1983-84 by a diverse group of business and environmental leaders and concerned officials. They came together out of a common belief that the United States needs to find ways of accelerating the cleanup of waste sites that mar the national landscape. The group, with the active support of EPA Administrator William Ruckelshaus, drew up a plan for a non-partisan institution to act as a catalyst as part of the negotiation and cleanup process involving specific disposal sites.

Allocating liability for waste site cleanup is often an extraordinarily difficult and complicated task, with scores of parties responsible for the substances at just one site. Multiply that by thousands of potential problem sites, and America's hazardous waste problem appears far more challenging than many people believed when news about Love Canal and other sites first made national headlines in the late 1970s.

Superfund, the nation's hazardous waste cleanup law, creates specific roles for the Environmental Protection Agency, other governmental organizations, and the parties responsible for pollution at a site. The negotiated settlements, in order to pave the way for cleanups, must be consistent with that law. But getting the relevant parties to agree simultaneously on hundreds of issues makes each settlement a major achievement.

What the business-environmental panel proposed was an organization carefully crafted to encourage private party involvement in the negotiation and cleanup process. In Clean Sites a mechanism was created for encouraging collaboration among the responsible parties and facilitating cooperation among all those affected by waste sites—large and small companies, local communities and their citizens, and government at all levels.

**B**ecause any new institution that proposes to play an active role in such a complex process can be misunderstood, it is essential to understand what Clean Sites is and is not:

- CSI IS NOT a replacement for a strong Superfund law. In fact, the success of Clean sites will depend on an amply funded Superfund, backed by strong and consistent federal enforcement activities that are essential incentives to voluntary cleanup.

- CSI IS a complement to the activities of the EPA. Sites at which CSI will be involved will be subject to the same standards that apply to all remedial cleanup actions.
- CSI IS a non-profit organization funded primarily by corporate and foundation contributions. It also depends on businesses, public interest groups, and academic institutions for expert advice and personnel on loan.

**T**he business-environmental panel unveiled the Clean Sites concept at a news conference that drew nationwide attention on May 31, 1984. The group identified a mission for the organization that includes:

- Cleaning up significantly more sites in the near term.
- Reducing the time from initial problem identification at a site to startup of remedial cleanup action, so that significant pollution problems are averted and ground water contamination is minimized.
- Accomplishing cleanup in a way that ensures satisfactory health and environmental protection.
- Encouraging development and use of the best public and private management resources that can be brought to bear on the problem.
- Meeting public and private expectations of accountability.

**C**lean Sites hopes to achieve its mission as an independent third party that brings together those the law defines as responsible for the waste at a site, to negotiate a settlement that allocates liability for costs of a governmentally approved plan for cleanup.

CSI can provide secure conference facilities at its Alexandria, Virginia headquarters on the Potomac shore, just across the river from Washington, D.C., and just four minutes from National Airport. But a major part of CSI's activity will, of course, find its personnel working at the sites and in the communities that surround them.

Once a negotiated settlement is reached, Clean Sites can provide guidance and support to facilitate planning and execution of remedial cleanup work. At the root of CSI is the assumption that the private sector has developed experience in carrying out complex projects in a well-managed and cost-effective manner. Industry has many resources that may well permit it to accomplish projects at less cost but with the same quality as the public sector. Through agreements with affiliated volunteer companies, CSI can harness private resources and channel them into government-approved cleanups.

But a waste site cleanup project cannot be successful without the support of the local community and its elected officials. Public fear about the possibility of cancer, genetic damage and birth defects from exposure to hazardous substances makes the issue an emotional and volatile one that must be handled openly and with great sensitivity.

Clean Sites will develop a community relations program that provides for a two-way flow of communications between affected citizens and CSI personnel. Through regular and frequent face-to-face contact, CSI will ensure that the public is informed AND that citizen concerns are heard and have influence on the decision-making process. CSI views public participation as essential to the successful cleanup of a waste site.

**C**SI will concentrate on sites listed on the final and proposed National Priority Lists of the Superfund program. CSI thus will be able to help clean up the nation's top priority sites and will not divert the EPA's other responsibilities. Sites come to CSI's attention from a variety of sources:

- The EPA and its regional offices, as well as state agencies, suggest sites where they believe CSI's involvement might be a key factor.
- Potentially responsible parties—individually and in groups—contact CSI to explore the possibility of working together.
- Citizen and public interest groups request CSI involvement at sites in their communities.

**C**lean Sites is designed to undertake a small but significant number of the total site cleanups that will eventually be accomplished nationwide. The EPA has identified 18,000 potential problem sites in the United States and estimates it may cost \$8 billion to \$16 billion to clean up 1,400 to 2,200 of them. CSI hopes to be involved at about 20 sites by the end of its first year of operation, and at about 60 sites by its third year.

CSI, however, hopes to provide benefits to society beyond the eventual cleanup of these sites—by developing specific models of settlements and remedial cleanup activities and by showing the way toward a consensus-based environmental policy for the 1980s that is less adversarial and more cooperative in nature.

Sincerely,

**Dr. Charles W. Powers, President**  
**Dr. John A. Klacsmann, Executive Vice-President**





## CLEAN SITES INC

1199 NORTH FAIRFAX STREET / ALEXANDRIA VIRGINIA 22314 / 703-683-8522

### FACT SHEET ON THE SED SITE

#### History

Two warehouses in the Greensboro area containing PCB-contaminated capacitors -- at 6219 Swing Court and at 500 E. Radar Road -- were abandoned earlier this year by a disposal contractor, SED Inc. Shortly after they were informed of the problem, a steering committee of companies and municipalities that sent the capacitors to SED for disposal began working on a plan to clean up the warehouses.

#### Current status

U.S. Environmental Protection Agency inspectors visited the SED site and determined it is stable, with no immediate threat of contamination outside of the warehouses and some trucks parked adjacent to one of them.

With the assistance of Clean Sites Inc., of Alexandria, Va. -- a non-profit organization dedicated to encouraging voluntary private party cleanups of waste sites -- preliminary work on the site starts this month (September 1985). Removal of the contamination is scheduled to begin later this year.

Clean Sites and the steering committee of parties involved at the SED site are cooperating with local, state and federal officials to assure this cleanup is accomplished in a manner that fully protects public health and the environment.

#### Preliminary work

The preliminary work at the site will be done by Ecoflo, Inc., of Greensboro. Ecoflo personnel, who will be wearing some protective equipment, will clean debris inside the warehouses, install additional security equipment, provide 24-hour surveillance of site conditions and take interim measures necessary until cleanup begins.

**PEOPLE WORKING IN BUSINESSES AROUND THE SED SITE WILL NOT BE EXPOSED TO PCB CONTAMINATION FROM ANY ACTIVITIES AT THE SITE.**

#### Cleanup

The cleanup will involve the safe removal of PCB-contaminated capacitors from the site, as well as removal of related materials such as shipping boxes, packing material, etc. All capacitors and related material will be taken from the SED site and disposed in a government-approved, environmentally-sound manner. After this has been completed, the warehouses themselves will be cleaned of remaining contamination in accordance with government standards, before the warehouses are returned to service.

#### PCBs and Capacitors

PCBs, or polychlorinated biphenyls, have been used as an insulating material in electrical equipment because PCBs help prevent the buildup of heat and fire. Capacitors are electrical devices that were used to increase voltage in power lines and to improve the efficiency of electrical systems.

POTENTIAL HAZARDOUS WASTE SITE  
PRELIMINARY ASSESSMENT  
PART I - INFORMATION AND ASSESSMENT

IDENTIFICATION NUMBER  
01 STATE 02 SITE NUMBER  
NC D 980 600 449

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site) SED, Inc. 02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER 900 Radar Road

03 CITY Greensboro 04 STATE NC 05 ZIP CODE 27409 06 COUNTY Guilford 07 COUNTY CODE 41 08 CONG DIST 08

09 COORDINATES: LATITUDE 36° 05' 14" LONGITUDE 079° 55' 57"

10 DIRECTIONS TO SITE (Starting from nearest public road) From Greensboro, take Friendly Road west toward the airport. Keep right onto Old Friendly Road and turn right onto Radar Road. The warehouse is on Radar Road.

Note: Location of Swing Court Site NCD 980 712 038 is: Lat: 36° 04' 15" Long: 079° 54' 34"

III RESPONSIBLE PARTIES

01 OWNER (If known) SED, Inc. 02 STREET (Business, mailing, residential) PO Box 1306

03 CITY Waukesha 04 STATE WI 05 ZIP CODE 53187 06 TELEPHONE NUMBER (414) 784-3740

07 OPERATOR (If known and different from owner) 08 STREET (Business, mailing, residential)

09 CITY 10 STATE 11 ZIP CODE 12 TELEPHONE NUMBER

13 TYPE OF OWNERSHIP (Check one)

A. PRIVATE  B. FEDERAL: \_\_\_\_\_ (Agency)  C. STATE  D. COUNTY  E. MUNICIPAL  F. OTHER: \_\_\_\_\_ (Specify)  G. UNKNOWN

14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply) (CERCLA 103c)

A. RCRA 3001 DATE RECEIVED: \_\_\_\_\_  B. UNCONTROLLED WASTE SITE DATE RECEIVED 11/4/81  C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION BY (Check all that apply)  
 YES DATE  A. EPA  B. EPA CONTRACTOR  C. STATE  D. OTHER CONTRACTOR  
 E. LOCAL HEALTH OFFICIAL  F. OTHER: \_\_\_\_\_

NO CONTRACTOR NAME(S): \_\_\_\_\_

02 SITE STATUS (Check one)

A. ACTIVE  B. INACTIVE  C. UNKNOWN

03 YEARS OF OPERATION

1981 | 1985 |  UNKNOWN  
BEGINNING YEAR | ENDING YEAR

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT. KNOWN, OR ALLEGED Transformers and capacitors containing PCB laden oil. PCB debris. PCB liquids. Asbestos. Paint wastes. Laboratory reagents. Low boiling hydrocarbons. 1,1,1 - trichloroethane.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

Drums of the materials listed above were stacked inside a warehouse on this site (and inside a warehouse on another site on Swing Road in Greensboro). A cleanup of both sites was conducted in 1985 under CERCLA.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents)

A. HIGH (Inspection required promptly)  B. MEDIUM (Inspection required)  C. LOW (Inspection on time available basis)  D. NONE (No further action needed, complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT Joe Deakins, Waste Management Specialist 02 OF (Agency/Organization) NC Solid and Hazardous Waste Mgt. Branch 03 TELEPHONE NUMBER (919) 563-1818

02 PERSON RESPONSIBLE FOR ASSESSMENT Grover Nicholson, Geologist 05 AGENCY NC DHR ORGANIZATION SHWMB 03 TELEPHONE NUMBER (919) 733-2801 08 DATE 8/10/87



POTENTIAL HAZARDOUS WASTE SITE  
PRELIMINARY ASSESSMENT

II. IDENTIFICATION

PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

01 STATE NC	02 SITE NUMBER D 980 600 449
----------------	---------------------------------

II. HAZARDOUS CONDITIONS AND INCIDENTS

01  A. GROUNDWATER CONTAMINATION      02  OBSERVED (DATE: \_\_\_\_\_)       POTENTIAL       ALLEGED  
03 POPULATION POTENTIALLY AFFECTED \_\_\_\_\_      04 NARRATIVE DESCRIPTION

01  B. SURFACE WATER CONTAMINATION      02  OBSERVED (DATE: \_\_\_\_\_)       POTENTIAL       ALLEGED  
03 POPULATION POTENTIALLY AFFECTED \_\_\_\_\_      04 NARRATIVE DESCRIPTION      The warehouse is 500 feet from Horsepen Creek, a tributary to Lake Brandt. Lake Brandt is a water supply reservoir for the city of Greensboro.

01  C. CONTAMINATION OF AIR      02  OBSERVED (DATE: \_\_\_\_\_)       POTENTIAL       ALLEGED  
03 POPULATION POTENTIALLY AFFECTED \_\_\_\_\_      04 NARRATIVE DESCRIPTION

01  D. FIRE/EXPLOSIVE CONDITIONS      02  OBSERVED (DATE: \_\_\_\_\_)       POTENTIAL       ALLEGED  
03 POPULATION POTENTIALLY AFFECTED \_\_\_\_\_      04 NARRATIVE DESCRIPTION  
Some drum contents are flammable.

01  E. DIRECT CONTACT      02  OBSERVED (DATE: \_\_\_\_\_)       POTENTIAL       ALLEGED  
03 POPULATION POTENTIALLY AFFECTED \_\_\_\_\_      04 NARRATIVE DESCRIPTION

01  F. CONTAMINATION OF SOIL      02  OBSERVED (DATE: \_\_\_\_\_)       POTENTIAL       ALLEGED  
03 AREA POTENTIALLY AFFECTED \_\_\_\_\_      04 NARRATIVE DESCRIPTION  
(Acres)

01  G. DRINKING WATER CONTAMINATION      02  OBSERVED (DATE: \_\_\_\_\_)       POTENTIAL       ALLEGED  
03 POPULATION POTENTIALLY AFFECTED \_\_\_\_\_      04 NARRATIVE DESCRIPTION  
See surface water contamination.

01  H. WORKER EXPOSURE/INJURY      02  OBSERVED (DATE: \_\_\_\_\_)       POTENTIAL       ALLEGED  
03 POPULATION POTENTIALLY AFFECTED \_\_\_\_\_      04 NARRATIVE DESCRIPTION

01  I. POPULATION EXPOSURE/INJURY      02  OBSERVED (DATE: \_\_\_\_\_)       POTENTIAL       ALLEGED  
03 POPULATION POTENTIALLY AFFECTED \_\_\_\_\_      04 NARRATIVE DESCRIPTION



GAO

United States General Accounting Office

Report to the Chairman, Subcommittee on  
Environment, Energy, and Natural  
Resources, Committee on Government  
Operations, House of Representatives

May 1987

# TOXIC SUBSTANCES

## Abandonment of PCBs Demonstrates Need for Program Improvements



# Overview of SED Involvement With PCBs and EPA Oversight of SED

SED, INC. (SED), went out of business in April 1985, abandoning a total of about 7 million pounds of PCB materials and equipment at its storage facility in Hillsboro, Ohio, and its storage and disposal facilities in Greensboro, North Carolina. From late 1979 until April 1985, SED attempted to widely expand its intermediate storage and permitted disposal operations. SED operated at least three intermediate storage facilities at Tempe, Arizona; Dayton, Ohio; and Hillsboro, Ohio. Both the Tempe and Dayton facilities were closed in the early 1980s and the PCBs transferred. SED also attempted to establish an intermediate facility in Big Bend, Wisconsin. SED's disposal operations were located at its permitted facility in Greensboro, North Carolina. In addition, SED attempted to locate a disposal and processing site in Maquoketa, Iowa, and sought approval from each of EPA's 10 regions for a portable capacitor decontamination process.

A major factor in the abandonment of almost 7 million pounds of PCB contaminants was that EPA did not act to prevent SED from acquiring large amounts of PCB materials while it only disposed of a small portion of these materials. EPA inspections of SED operations were not frequent or forceful enough to keep this situation from worsening. Furthermore, when inspections were made, the emphasis was apparently placed on assessing a penalty, and inadequate attention was directed toward correcting the problems that were found and/or suspected.

## SED Activities Between 1979 and 1981

Incorporated on November 13, 1979, with headquarters in Waukesha, Wisconsin, SED had two owners (50/50 shareholders) who served as president and vice president. SED offered its services to PCB equipment owners/generators of liquid PCB waste taken out of service. From 1979 to mid-1980, SED operated under its original corporate name, Safety Engineered Disposal, Inc., and was registered and licensed in Wisconsin as a PCB "collection and transporting service." In its advertising literature, the company said it would assume ownership and responsibility for the PCB waste, transport it to one of its PCB storage facilities, and provide for its ultimate disposition. SED also said that PCBs would be properly disposed of using either incineration or alternative destruction and disposal methods it would develop.

Through 1981, SED's operations primarily involved storage of PCB liquids in anticipation of developing an alternative destruction method. During 1980, SED obtained the PCB liquid from customers for a fee, according to EPA officials. SED provided special storage and transportation containers called SARASPACS (Safe Askarel Removal and Storage Package), which

held four 55-gallon drums. SED advertised that these unique containers would warn of any PCB liquid spill or leakage by actuating two battery-powered alarms. Fees for these services included \$1,300 to \$1,600 for each SARASPAC, based on transportation costs for four geographic transportation zones, plus a charge for final disposal of \$0.57 per pound.

During these years, SED operated storage facilities in Tempe, Arizona, and Dayton, Ohio. SED established a PCB storage facility in Tempe in 1980, which according to EPA officials, appears to have been its first permanent storage facility, and by June 1980 opened a second facility in Dayton. SED also sought to open a storage facility in Big Bend, Wisconsin, as early as February 1980 but was unsuccessful.

At each of these sites SED encountered strong state or local opposition, and it was forced to relocate. The citizens in Big Bend, Wisconsin, signed a petition opposing SED's plan and, therefore, SED abandoned its attempt to locate there. At the Tempe site, the Arizona Department of Health Services initiated enforcement action in July 1980 against SED because the storage facility was located below the 100-year flood plain, in violation of federal PCB regulations. In addition, the Arizona officials and an EPA contractor inspected this facility during late July and noted marking and labeling violations. The inspection report stated that PCB barrels and SARASPACS were not properly labeled or dated as required by PCB regulations. Several days later, SED decided to close this facility and told state officials that PCB materials were removed and transported to its Dayton, Ohio, facility. Region IX officials issued a Notice of Noncompliance to SED for the violations 7 months later; however, SED had already relocated to Dayton. According to EPA regional officials, region IX records still maintained on SED do not indicate whether EPA inspected the Tempe site to determine if it was clean after SED left in late July 1980.

SED's Dayton operations faced strong pressure during 1980 and 1981. In November 1980, Dayton passed a municipal ordinance barring the storage of PCBs within city limits after March 1981. During 1981 the city sought civil sanctions against SED in an Ohio court. According to SED's president, the political problems faced in Dayton were very draining financially during these 2 years. Once again, this continued opposition caused SED to move its operation to Hillsboro, Ohio. EPA officials stated that EPA did not make an inspection and they have no records or any recollection of any inspection after SED closed the Dayton site.

SED opened its Hillsboro storage facility in September 1980. In February 1981, questions from a U.S. Senator and a U.S. Congressman prompted

region V (Chicago) to investigate the SED site. Three months later, EPA inspected the Hillsboro site and found some marking and labeling deficiencies. However, region V did not believe that these deficiencies were sufficient to warrant any enforcement action and took no corrective action.

In August 1981, SED announced the development of a recycling and recovery process for PCB capacitors. This "detoxification" technique involved a series of washes and solvent extractions intended to separate PCBs physically from the solid materials. SED advertised that the end products of this process would be "PCB clean" paper, metal, and extraction solvent, as well as concentrated PCB liquid. SED's promotional literature said this process, using a sequence of closed separation processes, would recycle all material except the concentrated liquid PCBs. The company's intent was also to develop an economical dechlorination process for the concentrated liquid PCBs so that all materials could be recovered and reused.

SED's new technology for capacitors offered an alternative to high temperature incineration for PCB-contaminated materials. SED asserted that, through recycling, this technology would permit recovery and reuse of more than 70 percent of the materials in the United States estimated to be contaminated with PCBs. It also said that, if successful, concentrated liquid PCBs would be the only product requiring costly incineration. According to a 1982 SED invoice and discussions with an EPA regional official, SED charged between \$850 and \$1,240 for a special capacitor container called a CAPAC (a modified SARASPAC), and an additional charge of \$0.97 per pound as a recycling fee for the capacitors.

With the development of its capacitor decontamination process, SED activities now broadened from primarily storage of PCBs awaiting disposal to the decontamination of some materials for recycling. In early 1981 SED located a PCB facility in Greensboro, North Carolina, to process and decontaminate PCB capacitors for salvage and to eventually carry out the alternative destruction of PCB liquids through a process of dechlorination that it was researching. From June to December 1981, SED attempted to locate a similar processing site in Maquoketa, Iowa, but the city turned down its proposal.

## SED Activities From 1982 to April 1985

SED's announcement of its new decontamination and recycling process created a dilemma for EPA headquarters during 1982. From 1979 until early 1982, EPA interpreted "disposal" to mean only activities that alter

or destroy PCB molecules, while activities that only physically separate or concentrate PCBs from liquids or solids were judged not to constitute disposal and, therefore, did not require an EPA approval.

After the announcement of its new process in 1981, SED met with EPA headquarters officials to discuss its new separation process and inquired how the PCB regulations would apply to these operations. SED wanted to obtain EPA's informal approval of the various segments of its process because lack of approval was creating problems in the marketplace due to generators' inquiries concerning EPA regulations. In an August 1981 letter to SED, EPA stated that SED's capacitor decontamination process did not require either a permit or approval by EPA and that SED could conduct its solvent extraction operations that physically separated PCBs from other material.

However, in early 1982 EPA reviewed its interpretation of the PCB regulations and their application to these new alternate methods of disposal. Much discussion between headquarters and regional staffs ensued as EPA reexamined its early decisions. In April 1982, EPA reversed its previous interpretation, saying that the original PCB rules did not exempt PCB processing activities (including SED's physical separation technique) from the permit requirements. EPA was also concerned about the need to ensure that the scrap materials being recycled were PCB-free. Therefore, EPA decided that SED's separation process, since it was part of the disposal method, would require specific permit approval by the Regional Administrator or Assistant Administrator for Pesticides and Toxic Substances, EPA headquarters.

SED strongly objected to EPA's decision to require a permit for the capacitor decontamination process. Although it had sought EPA's acknowledgement and informal approval of its process in order to satisfy generator/owner's concerns, SED argued that a requirement for permit approval was inconsistent with the PCB regulations. SED did not plan to end the life of the PCB molecule with its process but rather planned to send the concentrated liquid PCBs that were being removed from the capacitors to an approved incinerator. However, SED applied for a permit for its capacitor decontamination process to region IV in late April.

## EPA Oversight of the Greensboro, North Carolina, Facility

SED located a facility in Greensboro, North Carolina, sometime in early 1981, according to regional EPA officials. Throughout 1982, SED, the North Carolina Department of Human Resources, and EPA Region IV (Atlanta) officials discussed SED's current operations and future plans for its Greensboro facility. Region IV began its oversight of SED in February 1982 with a joint EPA-state inspection of the Greensboro facility. During this informal walk-through, the EPA field inspector expressed concern about the large amounts of PCBs already stored at the facility. He roughly estimated that 200,000 pounds of PCBs and PCB-contaminated materials were already on the site,<sup>1</sup> and SED would need about 230 days of continuous operation with its planned separation and extraction process in order to ready the PCBs for incineration. However, the EPA inspector stated that the extraction system was not yet operational. This inspector told us he was concerned about SED's ability to dispose of the PCBs stored before the 1-year storage requirement date; that is, PCBs stored before January 1, 1983, were to be removed from storage and disposed of before January 1, 1984.

After its February 1982 inspection, region IV's oversight of SED shifted to the discussions between its toxic substances staff, EPA headquarters, and SED concerning whether or not SED's new separation process would require specific permit approval. In April 1982, EPA decided that a permit would be required and SED submitted an application for its capacitor decontamination process to region IV in late April.

PCB permitting was done exclusively by EPA's regional offices with little or no guidance from headquarters. Policy and criteria for permit review and approval were not established by the EPA headquarters program office, and consequently, each regional office was left to develop its own policies and criteria. SED's permit application was the first alternative type of its kind received by region IV and hence the region had little experience in developing criteria for approving alternate PCB destruction methods.

Region IV's review of the SED application was based on the theoretical assessment of the SED process as described in the application package. There were no national EPA requirements for a demonstration test, and the region did not require SED to demonstrate its process. The reviewing officials told us they had no reason to suspect that SED's process would not work, and they granted the permit. Approved on July 29, 1982,

<sup>1</sup>Rough estimates by volume were given by the EPA inspection report; estimates by weight were calculated by GAO using an industry formula.

region IV's permit listed 11 general conditions of authorization. (See appendix I.)

During late 1982 SED continued to expand its operations. In October 1982, the company opened a second warehouse facility in Greensboro and applied to each of EPA's 10 regions for a portable capacitor decontamination permit similar to the stationary process permitted by region IV. According to EPA officials, all applications for the portable process were forwarded to EPA headquarters for consideration of a nationwide permit. (Effective April 29, 1983, an EPA procedural amendment to the 1979 TSCA regulations transferred approval authority from the regional administrators to the Assistant Administrator for Pesticides and Toxic Substances for certain disposal facilities, including mobile processes or those intended to be used in more than one region.) EPA headquarters records do not indicate any subsequent action. EPA officials could only tell us that no permits were issued or approved, but not what exact action was taken on these applications.

In January 1983, EPA inspected the Greensboro sites and found a variety of TSCA violations. The EPA inspector noted TSCA storage, recordkeeping, and disposal violations. Furthermore, the same field inspector from the earlier February 1982 inspection raised continued concerns about the amount of PCBs being stored at both sites, which had increased dramatically from about 200,000 pounds in 1982 to approximately 2 million pounds of PCB liquids and PCB-contaminated materials. The inspection report also stated that only a limited number of capacitors had been processed, and no liquids had been sent to incineration during the past 11 months. SED's process had, therefore, not become fully operational because it was still in the testing or pilot stage. The inspector did not estimate how long it would take to process the 2 million pounds on hand during this inspection. But extrapolating from the earlier estimate of 230 days for 200,000 pounds, it would probably take several years to process the PCBs on hand when the process became fully operational.

During the 18 months following the January 1983 inspection, region IV decided what enforcement action was warranted, pursued a civil administrative penalty, and prepared for a formal hearing. During these 18 months, EPA's actions on SED were limited to pursuing the civil complaint. SED was, therefore, allowed to continue without any further controls or conditions being placed on its operations.

EPA issued its civil administrative complaint against SED in September 1983, calling for penalties of \$37,000 and possible termination of the

permit. The penalties were based on three counts: failure to maintain adequate records, improper storage, and improper disposal. Throughout late 1983 and early 1984, EPA issued two amended complaints and held an informal settlement conference with SED, which did not resolve the issues or reach a settlement.

EPA Region IV's counsel became actively involved in reviewing the evidence for the penalty counts around May 1984. A detailed review of the evidence was not done until a formal hearing was requested and scheduled, according to EPA counsel officials. Until this detailed review, EPA counsel relied on the program office's characterization of the evidence. Since the case had not been assigned special priority, initial reviews examined only language and form.

Consequently, the first time the regional counsel reviewed the evidence was during May 1984 in preparation for a scheduled late July hearing. The counsel found major problems with the complaint: some charges were misinterpretations of PCB regulations and, therefore, did not constitute actual violations; other charges lacked sufficient evidence or were ambiguous. Program officials admitted that the case was not thoroughly prepared and cited strained working relations between the case development officer and EPA counsel. On the basis of the regional counsel's assessment, EPA counsel withdrew the complaint against SED, "without prejudice," in late July 1984, and the case was dismissed.

In spite of the previous problems found at SED and the inspector's considerable concern regarding the large and growing stockpile of PCBs and PCB-contaminated materials, EPA waited for more than 2 years after the January 1983 inspection, until March 1985, before conducting another inspection of SED's Greensboro operation. EPA program officials told us that they did not inspect before then because they did not want to jeopardize the civil complaint.

In these inspections, region IV again found a variety of TSCA violations. The same field inspector cited (1) storage violations—PCB items stored in excess of the now effective 1-year storage requirement, (2) record-keeping violations—records not maintained, and (3) marking violations. Further, there was no evidence that the capacitor materials that had been readied for scrap had been analyzed to determine if they were PCB-free, and none of the PCB-contaminated paper taken from the capacitors had been either decontaminated or properly disposed of. The EPA inspection report stated that this inspection was not completed because of lack of time and that EPA intended to return. Therefore, no immediate

enforcement actions were taken. SED abandoned the site the month following this inspection.

### EPA Oversight of the Hillsboro, Ohio, Facility

A second inspection was conducted at the Hillsboro facility in May 1984, 3 years after the first inspection that had found some deficiencies that, according to EPA, did not warrant enforcement actions. During this 1984 inspection, the EPA inspector noted storage violations, which involved PCB items stored in excess of the 1-year storage requirement. According to an EPA official, EPA was in the process of proposing a civil administrative complaint with a penalty assessment when SED abandoned the facility in April 1985.

### Abandonment of SED Facilities

On April 15, 1985, SED informed both EPA Regions IV and V administrators that the company was unable to continue in business, and it abandoned its facilities in Greensboro, North Carolina, and Hillsboro, Ohio. About 6 million pounds of PCBs and PCB-contaminated materials were abandoned at the Greensboro facilities and approximately 700,000 pounds at Hillsboro, according to the company that coordinated the cleanup efforts. Both EPA regions inspected the abandoned facilities by the end of April; however, the regions varied in how quickly they processed subsequent enforcement actions against SED.

Region IV conducted two inspections before it issued a civil administrative complaint 10 months after the April abandonment. Its first inspection was done in conjunction with state officials. The inspection focused primarily on evaluating and assessing the extent of abandonment. For several months region IV's attention shifted to identifying the potentially responsible parties (PRPs), the owners/generators of the PCBs, who might be liable for any cleanup costs. (According to EPA regulations, the original owners of the PCBs are still held responsible for proper disposal.) Region IV reinspected the site in August 1985 in order to photograph PCB material containers that were stored at the site for over 1 year. Following this inspection the region revoked SED's permit in late August.

Region IV's March, April, and August 1985 inspections served as the basis for the current civil administrative complaint, issued in February 1986. This complaint calls for \$2.424 million in penalty assessments. It describes four major counts against SED:

- Improper disposal. Region IV interpreted the regulations to conclude that abandonment of the facilities constitutes improper disposal and, therefore, violates PCB regulations.
- Improper storage. PCB items had been stored longer than the 1 year allowed by the regulations.
- High PCB concentrations. The capacitor materials that had been readied for scrap were not PCB-free.
- Inadequate records. SED failed to maintain adequate records required by the PCB regulations and disposed of other records at the facility.

Region V also conducted an April 1985 inspection after SED abandoned the Hillsboro site. The inspection revealed continued violations of the 1-year storage requirement. The region reworked the civil administrative complaint being processed as a result of the May 1984 inspection and, in June 1985, issued the current complaint with \$1.035 million in penalty assessments for violations of the 1-year storage requirement.

Both civil administrative complaints against SED, totaling about \$3.5 million, were still current and remained unresolved as of April 1987. Region IV officials estimate that SED may have taken in \$3 to \$15 million in fees. Although both regions have reviewed available financial records related to SED's business activities, regional officials have stated that it is a difficult process to prove that any additional SED assets still remain in order to pay any of the assessed penalties. The two principal owners of SED have stated that they are insolvent and cannot pay any penalty. In addition, SED's bank in Wisconsin has stated that all available assets of the corporation have been liquidated.

## SED Defaults on an SBA Loan

In May 1981, the Small Business Administration (SBA) guaranteed \$400,000 (two-thirds) of a \$600,000 loan made to SED by a Wisconsin bank. The loan was to purchase property, machinery, and equipment needed for SED's PCB operations. According to an SBA finance chief, SED became delinquent on the loan in the spring of 1982, but was able to correct the situation. SED had a good payment record for the next 2-1/2 years. However, in November 1984, SED became delinquent again and could not recover. In March 1985, the Wisconsin bank issued SED a demand for payment. SED responded and liquidated its assets by the fall of 1985, and all the proceeds were applied against the loan. About \$11,000 was applied toward the SBA portion of the loan. In April 1986, having determined that all assets had been disposed of and no further avenues of recovery were available, SBA charged off the loan. SBA lost about \$300,000 in federal funds.

## Cleanup Activities at Greensboro, North Carolina, and Hillsboro, Ohio

Cleanup of both facilities was carried out by the generators and owners of the PCB waste as a private party cleanup, primarily under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA, the Superfund law). These PRPs included the current and former owners/operators who generated the PCBs. Under CERCLA, PRPs may be liable for any costs incurred by the government in taking corrective actions at the site. After SED abandoned the two sites, both EPA regions began the process of identifying and notifying the PRPs to encourage voluntary cleanup activity.

Region IV found it easier than region V to get the PRPs' commitment to finance the cleanup voluntarily. In region IV about 180 PRPs organized a strong steering committee led by executives of a local company that was a major PRP. In July 1985 the PRPs first met with Clean Sites, which was hired by the PRPs to act as facilitator and mediator in the cleanup of both the North Carolina and Ohio sites. (Clean Sites is a private, nonprofit organization contracted by PRPs to provide project management during both the planning and implementation stages of the cleanup.) Preliminary work on the Greensboro facilities, including the removal of flammable substances and site security, took place in September and October 1985. Clean Sites worked with the PRPs to allocate cleanup costs among the PRPs and devise a cleanup plan.

In late December, EPA signed a consent order approving a detailed cleanup plan. The consent order paved the way for speedy cleanup: all PCB waste was removed by the end of March 1986, and decontamination of the site was completed by June 1986. The cleanup was technically straightforward, according to Clean Sites officials, because very little soil and no groundwater were contaminated. The site included 2 warehouses and 11 trailers containing approximately 6 million pounds of PCBs and PCB-contaminated materials. The cleanup cost was approximately \$6.5 million, according to Clean Sites officials.

In region V the process of financing and beginning the cleanup of the Hillsboro facility took longer. In October 1985, EPA notified about 20 major PRPs and requested a December 1985 meeting. Clean Sites attended that meeting and later functioned as a consultant for the PRPs. Through May 1986, according to the regional counsel, region V officials met with the PRPs and notified approximately 50 additional PRPs. At that time the PRPs agreed to clean up the facility, assuming an acceptable consent order could be negotiated. In November 1986, a leaking roof at the Hillsboro facility prompted the PRPs to begin the cleanup while continuing to work on the consent order because of the potential contamination that

could result from rain and snow getting into the facility. By the end of December 1986, the PRPs had completed the removal of approximately 700,000 pounds of PCB materials. Clean Sites estimated the cost for the total cleanup to be about \$650,000. As of March 1987, EPA was evaluating the sample analyses taken after the removal was completed, to determine the adequacy of the work and whether additional cleanup work would be required.

The final cleanup of both the Greensboro and Hillsboro sites has been essentially completed with costs to the PRPs totaling over \$7 million. However, both civil administrative complaints against SED, totaling \$3.5 million, are still current and remain unresolved. EPA does not know whether the Tempe, Arizona, and Dayton, Ohio, sites were inspected after SED transferred its operations out of these two locations. Therefore, we believe that EPA should take action to ensure that these locations are inspected or determine whether a proper cleanup was completed so as to protect future tenants from possible PCB contamination.

## Conclusions

A major factor in SED's abandonment of almost 7 million pounds of PCB contaminants was that EPA did not act to prevent SED from continuing to acquire large amounts of PCB materials while it only disposed of a small portion. There were a number of actions EPA could have taken to prevent or at least significantly limit the quantity of PCBs that was abandoned. EPA's role leading up to the abandonment of PCBs and our recommendations to avert similar abandonments are discussed in chapter 3.

While SED abandoned both the Greensboro and Hillsboro sites, the Hillsboro intermediate site did not require a permit for its storage operations. Due to its processing and disposal activities, SED's Greensboro site had an EPA permit. We believe that in carrying out its permit and enforcement responsibilities for SED, region IV failed to take at least three important actions:

- requiring SED to demonstrate the effectiveness of its process before it was given permit approval;
- reinspecting the Greensboro facility during January 1984 when the TSCA 1-year storage requirement became effective. This reinspection would have provided the evidence necessary to support EPA's complaint that SED had retained large quantities of PCBs after the required disposal date; and

- amending SED's July 1982 disposal permit to include enforceable and specific permit requirements. Such requirements could have placed limits on SED's acquisition of additional PCB materials until it had properly disposed of PCBs it already held.



North Carolina Department of Human Resources  
 Division of Health Services  
 P.O. Box 2091 • Raleigh, North Carolina 27602-2091

James G. Martin, Governor  
 Phillip J. Kirk, Jr., Secretary

Ronald H. Levine, M.D., M.P.H.  
 State Health Director

November 7, 1986

SED, Inc.  
 PO Box 1306  
 Waukesha WI 53187

RE: EPA ID No.: NCD980712038

Dear Sir:

Based on information supplied by you for the site identified with the above EPA ID number, the state has accepted and processed the change RCRA listing or information that you requested.

Deleted As:  
 Small Generator

Listed below is site information contained on our computer files:

COMPANY NAME	<u>SED, Inc.</u>
OWNERSHIP	<u>SED, Inc.</u>
CONTACT	<u>Olmsted John Vice Pres</u>
PHONE NUMBER	<u>(414)784-3740</u>
LOCATION ADDRESS	<u>6219 Swing Court</u>
CITY, STATE & ZIP	<u>Greensboro NC 27409</u>

Please verify that the above computer listing/information is correct by notifying us of any corrections.

We are advising EPA of the change. Please notify us if there is any further change in your operations which would affect your status. Your EPA ID number has been inactivated.

Sincerely,

Margaret Babb, Environmental Chemist  
 Solid & Hazardous Waste Management Branch

CC: JOSEPH H. DEAKINS  
 EPA Region IV



North Carolina Department of Human Resources  
 Division of Health Services  
 P.O. Box 2091 • Raleigh, North Carolina 27602-2091

James G. Martin, Governor  
 Phillip J. Kirk, Jr., Secretary

Ronald H. Levine, M.D., M.P.H.  
 State Health Director

October 30, 1986

SED Inc  
 PO Box 1306  
 Waukesha WI 53187

RE: EPA ID No.: NCD980600449

Dear Sir:

Based on information supplied by you for the site identified with the above EPA ID number, the state has accepted and processed the change RCRA listing or information that you requested.

Deleted As:  
 Transporter

Listed below is site information contained on our computer files:

COMPANY NAME	<u>SED Inc</u>
OWNERSHIP	<u></u>
CONTACT	<u>Olmsted John Vice Presidt</u>
PHONE NUMBER	<u>(414)784-3740</u>
LOCATION ADDRESS	<u>500 Radar Rd</u>
CITY, STATE & ZIP	<u>Greensboro NC 27409</u>

Please verify that the above computer listing/information is correct by notifying us of any corrections.

We are advising EPA of the change. Please notify us if there is any further change in your operations which would affect your status. Your EPA ID number has not been inactivated.

Sincerely,

Margaret Babb, Environmental Chemist  
 Solid & Hazardous Waste Management Branch

CC: JOSEPH H. DEAKINS  
 EPA Region IV



Department of Human Resources  
Division of Health Services  
Solid and Hazardous Waste Management Branch

APPROVED

BY: [Signature]  
DATE: 10/14/86



APPLICATION FOR CHANGE IN CLASSIFICATION UNDER RCRA

Date: 10-10-86

Company Name: SED INC.

Company Address: 500 Rddar Rd.  
Greensboro 27409

EPA ID No: NCD980600449

Mr. William L. Meyer, Head  
Solid & Hazardous Waste Management Branch  
Division of Health Servics  
Post Office Box 2091  
Raleigh, N.C. 27602

Joe Dackins  
Guilford

Dear Mr. Meyer:

Our Company requests the following change in its classification under RCRA (check all that apply):

Add As

Delete As

Generator

Transporter

Treater

Storer

Disposer

Small Generator



The reason for this request is:

Company is out of business. Clean up  
was conducted by EPA in Spring 1986. No  
hazardous waste on site. Cancel ID number

NOTES: 1) Be specific. Give all pertinent information. This may be a change in your process; a change in your handling procedures; new analyses, or the like.

2) This is not a delisting petition with respect to a listed waste.



- 3) If you are requesting deletion as a treater, storer, or disposer, our branch will immediately institute steps to terminate your interim status. The termination process will include a public notice in your local paper to the effect that interim status has been terminated for this plant. Thus, in this case we must insist that your request be signed by a major corporate officer.
- 4) If this request involves small generator status, it must include an accurate statement of your present and anticipated waste generation. This is necessary because changes in the small generator definition are expected. (Attach an additional sheet.)

If your request would remove your plant from the regulated system, but you wish to retain an EPA ID Number, please give your reasons.

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I understand that my company must supply information about any changes in its operations which might change its status again to our office on its own initiative.

I certify that the information supplied is accurate and correct to the best of my knowledge and belief.

I am authorized to make this request on behalf of my company at the location-give. (Refer again to notes 3 and 4 before signing.)

Name (printed or typed): \_\_\_\_\_

Signature: \_\_\_\_\_

Company Title: \_\_\_\_\_

*Cancel ID No. - J. H. Deakin*



G

North Carolina Department of Human Resources  
Division of Health Services  
P.O. Box 2091 • Raleigh, North Carolina 27602-2091

James G. Martin, Governor  
Phillip J. Kirk, Jr., Secretary

Ronald H. Levine, M.D., M.P.H.  
State Health Director

October 30, 1986

SED, Inc.  
PO Box 1306  
Waukesha WI 53187

RE: EPA ID No.: NCD980712038

Dear Sir:

Based on information supplied by you for the site identified with the above EPA ID number, the state has accepted and processed the change RCRA listing or information that you requested.

Deleted As:  
Transporter

Listed below is site information contained on our computer files:

COMPANY NAME	SED, Inc.
OWNERSHIP	SED, Inc.
CONTACT	Olmsted John Vice Pres
PHONE NUMBER	(414)784-3740
LOCATION ADDRESS	6219 Swing Court
CITY, STATE & ZIP	Greensboro NC 27409

Please verify that the above computer listing/information is correct by notifying us of any corrections.

We are advising EPA of the change. Please notify us if there is any further change in your operations which would affect your status. Your EPA ID number has not been inactivated.

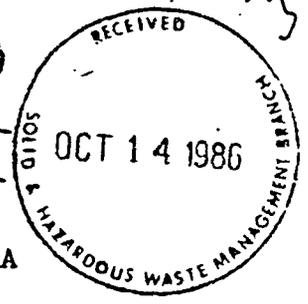
Sincerely,

Margaret Babb, Environmental Chemist  
Solid & Hazardous Waste Management Branch

CC: JOSEPH H. DEAKINS  
EPA Region IV

Department of Human Resources  
Division of Health Services  
Solid and Hazardous Waste Management Branch

APPROVED  
BY: LDG  
DATE: 10/14/86



APPLICATION FOR CHANGE IN CLASSIFICATION UNDER RCRA

Date: 10-10-86

Company Name: SED clne.

Company Address: 6219 Swing Court  
Greensboro 27409

EPA ID No: NC D980712038

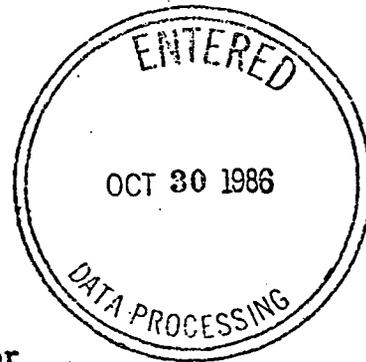
Mr. William L. Meyer, Head  
Solid & Hazardous Waste Management Branch  
Division of Health Service  
Post Office Box 2091  
Raleigh, N.C. 27602

*Joe Deakins*  
*Hullford*

Dear Mr. Meyer:

Our Company requests the following change in its classification under RCRA (check all that apply):

<u>Add As</u>	<u>Delete As</u>	
<input type="checkbox"/>	<input type="checkbox"/>	Generator
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Transporter
<input type="checkbox"/>	<input type="checkbox"/>	Treater
<input type="checkbox"/>	<input type="checkbox"/>	Storer
<input type="checkbox"/>	<input type="checkbox"/>	Disposer
<input type="checkbox"/>	<input type="checkbox"/>	Small Generator



The reason for this request is:

Company is out of business. Clean up was  
conducted by EPA in Spring 1986. No hazardous  
waste on site. Cancel ID number

- NOTES: 1) Be specific. Give all pertinent information. This may be a change in your process; a change in your handling procedures; new analyses, or the like.
- 2) This is not a delisting petition with respect to a listed waste.

- 3) If you are requesting deletion as a treater, storer, or disposer, our branch will immediately institute steps to terminate your interim status. The termination process will include a public notice in your local paper to the effect that interim status has been terminated for this plant. Thus, in this case we must insist that your request be signed by a major corporate officer.
- 4) If this request involves small generator status, it must include an accurate statement of your present and anticipated waste generation. This is necessary because changes in the small generator definition are expected. (Attach an additional sheet.)

If your request would remove your plant from the regulated system, but you wish to retain an EPA ID Number, please give your reasons.

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I understand that my company must supply information about any changes in its operations which might change its status again to our office on its own initiative.

I certify that the information supplied is accurate and correct to the best of my knowledge and belief.

I am authorized to make this request on behalf of my company at the location give. (Refer again to notes 3 and 4 before signing.)

Name (printed or typed): \_\_\_\_\_

Signature: \_\_\_\_\_

Company Title: \_\_\_\_\_

*canal ID number - J. H. Deakin*

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IV

IN THE MATTER OF: )  
 SED, Inc. Site ) DOCKET NO. 86-06-C  
 )  
 6205 Swing Court )  
 6219 Swing Court )  
 500-E Radar Road ) ADMINISTRATIVE ORDER  
 ) ON CONSENT  
 Greensboro, North Carolina )  
 )  
 )

PROCEEDING UNDER SECTION 106(a) OF THE  
COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION  
AND LIABILITY ACT of 1980, 42 U.S.C. §9606(a)

JURISDICTION

This Administrative Order on Consent ("CONSENT ORDER") is entered into by the persons listed on Attachment A hereto (hereinafter referred to as "Respondents"), and the United States Environmental Protection Agency (EPA) pursuant to the authority vested in the President of the United States by Section 106(a) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S.C. §9606(a), and delegated to the Administrator of EPA by Executive Order 12316, August 20, 1981, 46 Fed. Reg. 42237, and further delegated to the Regional Administrator, Region IV. Pursuant to Section 106(a) of CERCLA, 42 U.S.C. §9606(a), the State of North Carolina has previously been notified of this Order. To the limited extent specified herein, the responsible parties listed on Attachment B hereto are also participating in this CONSENT ORDER.

To accomplish the mutual objectives of EPA and the Respondents, and to resolve this matter promptly and constructively without litigation, the Respondents agree to undertake all actions required by the terms and conditions of this CONSENT ORDER.

The Respondents neither admit nor deny findings of fact or conclusions of law or determinations made herein; however, Respondents agree not to challenge these findings or conclusions for purposes of this CONSENT ORDER only. The Respondents reserve all rights they may have to object to, contest, or defend against any allegation of violation of this CONSENT ORDER.

CONCURRENCES

SYMBOL	AWD-ERR	4WD-ERR	4ORC	4RA			
SURNAME	Hitchcock	Smith	Sargent	Ravan			
DATE	12/20/85	G.M. 12/20	JAS 12/20/85				

PARTIES

This CONSENT ORDER shall apply to and be binding upon the following parties:

1. Respondents, their successors, assigns, subsidiaries, and upon all persons, agents, contractors and consultants acting under or for either the Respondents or EPA or both in carrying out the actions required by this CONSENT ORDER.
2. The United States Environmental Protection Agency.
3. To the limited extent specified in paragraphs 1, 8, 23 and 24 of the Consent Order section of this document, the participating responsible parties listed on Attachment B hereto, or listed in any amendments thereto which Respondents in their discretion may submit (hereinafter collectively referred to as Attachment B).

FINDINGS OF FACT

EPA has determined that all findings of fact necessary for the issuance of this CONSENT ORDER pursuant to Section 106(a) of CERCLA have been made as outlined below:

1. The SED, Inc., Site consists of three separate facilities located at 6205 Swing Court, 6219 Swing Court and 500-E Radar Road in Greensboro, North Carolina.
2. Between 1982 and 1985, SED, Inc. was engaged in the storage and processing of polychlorinated biphenyls (PCB's) and PCB contaminated material at the Site. By letter of July 29, 1982, SED, Inc. was granted approval by the Regional Administrator of EPA Region IV to destroy PCB capacitors pursuant to the authority granted to the Regional Administrator pursuant to Section 6(e) of the Toxic Substances Control Act (15 U.S.C. §2605(e)) and 40 C.F.R. §761.10(e). Between 1982 and 1985, the Respondents listed on Attachment A and the participating responsible parties listed on Attachment B, among over 150 entities, in conformity with applicable laws and regulations, caused PCB containing materials to be shipped to the Site for processing. In fact, SED did not destroy all the PCB's or PCB capacitors transported to this Site. SED, Inc., abandoned the Site in April, 1985.
3. The facilities at all locations include warehouses that were used for the storage of PCB's, PCB-contaminated materials or processed materials. At 500-E Radar Road there also are trailers used for storage of such materials. The 6219 Swing Court and 500-E Radar Road facilities contain drums of PCB-containing liquid, PCB capacitors, transformers and PCB-contaminated materials such as soil, debris, rags and the like.

4. Minor leaks or stains of fluid from containers have been observed within the 6219 Swing Court and 500-E Radar Road facilities. Respondents already have taken steps to prevent further leaks or stains.
5. Polychlorinated biphenyls are chlorinated hydrocarbons which are used as dielectric and cooling fluids in electrical equipment.
6. Depending upon level and duration, exposure to PCB's may cause illness, disease or other harmful effects to plant, animal life or humans.
7. The 500-E Radar Road facilities are located in an industrial park located near the regional airport that serves Greensboro, North Carolina and the surrounding area.
8. The 6205 Swing Court and 6219 Swing Court facilities are located in a warehouse complex near Horsepen Creek, Buffalo Creek and a trailer park.
9. Upon being informed that SED, Inc., had abandoned the Site, Respondents acted expeditiously to secure the 6219 Swing Court 500-E Radar Road facilities with locks and to place the facilities under 24-hour surveillance by a security service. Respondents, through their consultant, Clean Sites, Inc., also acted to take samples at the Site and to remove combustible material, while organizing and coordinating a joint effort to properly address the removal and disposal of PCB's and PCB-contaminated materials at the Site, as well as the decontamination of the Site.
10. The continued presence of stored PCB's in bulk at the 6219 Swing Court and 500-E Radar Road facilities presents a threat of release of those hazardous substances to the environment.

#### CONCLUSIONS OF LAW

1. Respondents are "persons" as defined in Section 101(21) of CERCLA, 42 U.S.C. §9601(21).
2. The Site is a "facility" within the meaning of Section 101(9) of CERCLA, 42 U.S.C. §9601(9).
3. The polychlorinated biphenyls stored in bulk at the Site are "hazardous substances" as defined in Section 101(14) of CERCLA, 42 U.S.C. §9601(14).
4. The presence of hazardous substances stored in bulk at the Site constitutes a threat of release to the environment within the meaning of Section 101(22) and 106(a) of CERCLA, 42 U.S.C. §9601(22) and §9606(a).

5. The Respondents are responsible parties pursuant to Section 107(a)(2) or (3) of CERCLA, 42 U.S.C. §9607(a)(2) or (3).

#### DETERMINATIONS

Based on the foregoing Findings of Fact and Conclusions of Law, and the entire record of this proceeding, the Regional Administrator has determined that: (a) The threat of release of hazardous substances stored in bulk from the Site may present an imminent and substantial endangerment to the public health or welfare or the environment; (b) In order to protect public health and welfare or the environment, it is necessary that the action required in this CONSENT ORDER be taken to mitigate the threat of the release of hazardous substances from the Site; and (c) The actions required in this CONSENT ORDER are consistent with the National Contingency Plan.

#### CONSENT ORDER

The parties having reached a resolution of the issues involved in this proceeding, it is therefore AGREED and ORDERED as follows pursuant to CERCLA Sections 106(a) and 104(a), 42 U.S.C §9606(a) and §9604(a):

1. The Respondents listed on Attachment A hereto, on their own behalf and on behalf of the participating responsible parties listed on Attachment B hereto, shall implement the tasks detailed in Attachment C, "Statement of Work, SED Site Cleanup, Greensboro, N.C." (the Cleanup Plan), which is incorporated herein in its entirety by this reference.
2. Respondents shall be permitted to extend the time schedules set forth in Attachment C only to the extent that the delay is caused by reasons beyond the control of Respondents or the control of any entities controlled by or under common control of Respondents. Increased costs will not be considered a reason for delay beyond the control of Respondents. The burden of establishing a basis for an extension shall be exclusively on Respondents.
3. If Respondents fail to achieve any deadline set forth in this CONSENT ORDER, they shall submit a written report by certified mail to EPA. Such report shall be submitted within ten (10) working days following the missed deadline, and shall include:
  - (a) An explanation for the failure to meet the deadline;
  - (b) The measures taken and to be taken by Respondents to minimize the delay;

- (c) The timetable by which those measures will be implemented which will not be beyond the period of time reasonably necessary for completion of those activities on an expedited schedule calculated to minimize the delay.
  - (d) Any documentation relevant to 3(a) through 3(c).
4. EPA will respond promptly in writing to any report by Respondents pursuant to Paragraph 3 of this Section by indicating whether EPA approves Respondents' proposed date or time period for completion of the delayed activities. EPA's written approval will be deemed to be incorporated into this CONSENT ORDER. If EPA does not so approve, EPA will so state in writing the reasons for such disapproval, and also state the date by which, or the time period within which, Respondents shall achieve the tasks as to which the deadline applied. Respondents' failure to comply with the schedule as incorporated may be construed to be a violation of this CONSENT ORDER which may subject Respondents to the penalties provided by Sections 106(b) and 107(c)(3) of CERCLA, 42 U.S.C. §§ 9606(b) and 9607(c)(3).
  5. Upon mutual agreement of the parties, this CONSENT ORDER may be amended or modified, including by amendments or modifications necessary to address such cleanup or decontamination activities as are not currently addressed in the Cleanup Plan but are necessary to protect public health and the environment. Such amendments or modifications shall be in writing and shall have as their effective date, the date on which such amendments are signed by EPA.
  6. Neither the United States nor any agency or agents or employees thereof shall be liable for any injuries or damages to persons or property resulting from acts or omissions of Respondents, their officers, directors, employees, agents, servants, receivers, trustees, successors, or assignees, or of any persons, including but not limited to firms, corporations, subsidiaries, contractors or consultants, in carrying out activities pursuant to this CONSENT ORDER, nor shall the United States or any agency or agents or employees thereof be held out as a party to any contract entered into by the Respondents in carrying out activities pursuant to this CONSENT ORDER. This paragraph does not apply to any agency of the United States that has been identified as a potentially responsible party at this Site.
  7. In the event that Respondents fail to adhere to any requirement of this CONSENT ORDER or, notwithstanding compliance with the terms of this CONSENT ORDER, upon the occurrence of discovery of a situation as to which EPA would be obligated to take any further response action, including but not

limited to an immediate removal, planned removal, and/or interim actions; or in the event of a release or threatened release not addressed by this CONSENT ORDER; or upon the determination that action beyond the terms of this CONSENT ORDER is necessary to abate an imminent and substantial endangerment to the public health or welfare or the environment that may be posed by this Site; EPA, may, after oral notice to Respondents' Executive, institute federally-funded response activities and subsequently pursue cost recovery actions and/or EPA may issue orders to Respondents and/or any non-participating responsible parties pursuant to available statutory authority, or it may take any combination of these actions. Such oral notice shall be reduced to writing within three days. Respondents reserve their right to contest any such actions by EPA.

8. EPA waives its right to bring any action against Respondents or the participating responsible parties listed on Attachment B hereto, pursuant to Section 107 of CERCLA for recovery of its costs incurred in oversight of Respondents' implementation of this CONSENT ORDER, any past costs incurred by EPA in connection with its response activities at the Site and, with regard to the participating responsible parties listed on on Attachment B hereto only, any future costs incurred by EPA in connection with its response activities at the Site, and any other actions or claims pursuant to CERCLA regarding this Site.
9. Respondents are advised that willful violation of, or failure to comply with, this CONSENT ORDER, or any portion thereof, may subject Respondents to a civil penalty of not more than \$5,000 for each day in which such violations occur or in which such failure to comply continues. Failure to comply with this CONSENT ORDER, or any portion thereof, without sufficient cause, may also subject Respondents to liability for damages in the amount of three (3) times the total of all costs incurred by the government as a result of Respondents' failure to take proper action.
10. EPA agrees that the penalties and damages referred to in paragraph 9 above are inoperative in the event the Respondents fully and completely comply with this Consent Order.
11. Respondents shall appoint a Potentially Responsible Party Executive (PRPE) who shall be responsible for implementation of this CONSENT ORDER and the activities required herein. All reports, comments and other correspondence directed to Respondents will be made available to that Executive.
12. EPA shall appoint an On-Scene Coordinator (OSC) who shall have the authority vested by the National Contingency Plan at 40 C.F.R. Part 300. This includes the authority to halt, conduct or direct any tasks required by this CONSENT ORDER

and/or any response actions or portions thereof when conditions present an imminent and substantial endangerment to the public health or welfare or the environment or to assure that such tasks or actions are not inconsistent with the National Contingency Plan. The OSC, or any person designated by the OSC, will have the right to move freely about the Site at all times when work is being carried out pursuant to this CONSENT ORDER.

13. All cleanup work performed pursuant to this CONSENT ORDER shall be under the direction of a qualified person with expertise and experience in hazardous waste site cleanup. Respondents shall notify EPA as to the identity of such person and of any contractors and subcontractors to be used in carrying out the terms of this CONSENT ORDER in advance of their work at the Site.
14. Either party shall submit to the other upon request all sample collection, sample preservation, chain-of-custody, laboratory analysis and quality assurance procedures utilized by either party pursuant or pertaining to this CONSENT ORDER.
15. Upon request by EPA, Respondents shall provide EPA or its designated representatives under this CONSENT ORDER with duplicate and/or split samples of any samples collected in furtherance of work performed in accordance with this CONSENT ORDER. Respondents shall notify EPA at least seven (7) days prior to the time it will conduct any sampling undertaken pursuant to this CONSENT ORDER.
16. Upon request all (1) sampling and monitoring data which has met EPA standards for quality assurance and quality control and (2) other data and information, generated pursuant to this CONSENT ORDER by Respondents or on behalf of Respondents, shall be made available by Respondents to EPA or its designated representative. Upon request, EPA will make available to Respondents all sampling and monitoring data pertaining to this Site which has met EPA standards for quality assurance and quality control, as well as any other data or information pertaining to the Site.
17. All records produced by Respondents and delivered to EPA in the course of implementing this CONSENT ORDER, as well as all other information pertaining to the Site in the possession of EPA, shall be available to the public unless identified as confidential by Respondents or EPA in conformance with 40 C.F.R. Part 2. Records so identified shall be treated as confidential only in accordance with the applicable confidentiality regulations. No sampling and monitoring data or hydrological or geological information shall be considered confidential.

18. All correspondence, reports, work plans and other writings required under the terms of this CONSENT ORDER to be submitted to EPA shall be sent by Certified Mail, return receipt requested, to the following address:

Mr. Shane Hitchcock  
Emergency and Remedial Response Branch  
U.S.E.P.A. - Region IV  
345 Courtland Street, NE Atlanta,  
GA 30365

19. All correspondence, reports and other writings required under the terms of this CONSENT ORDER to be submitted to Respondents shall be sent by Certified Mail, return receipt requested, to the following:

Mr. Gordon Jolley  
Clean Sites Inc.  
1199 North Fairfax Street  
Alexandria, VA 22314

Mr. Austin Thies  
Duke Power Company  
P.O. Box 33189  
Charlotte, NC 28242

20. In the event that Respondents and EPA are unable to agree on amendments or modifications to the CONSENT ORDER, EPA reserves all rights to take such actions against Respondents and responsible parties not participating in this CONSENT ORDER as it deems necessary, and Respondents reserve all rights to contest such actions.
21. EPA hereby agrees to cooperate to the fullest extent possible in the implementation of this CONSENT ORDER.
22. Respondents shall preserve all records developed pursuant to implementation of this CONSENT ORDER for a period of at least six (6) years following completion of all work conducted by Respondents pursuant to this CONSENT ORDER.
23. Notwithstanding any other provision herein, EPA waives any claims it might have under the Toxic Substances Control Act (15 U.S.C. § 2501 et. seq.) which have arisen or which may arise out of the failure of Respondents and the participating responsible parties listed on Attachment B hereto to dispose of PCBs and PCB-contaminated matter existing on the Site within one year from the date when they were first placed into storage for disposal.

24. Nothing herein is intended to release any claims, causes of action or demands in law or equity against SED, Inc., or any person, firm, partnership, corporation or governmental entity not 1) a signatory to this CONSENT ORDER or 2), a participating responsible party listed on Attachment B hereto, for any liability it may have arising out of or relating in any way to the generation, storage, treatment, handling, transportation, release, or disposal of any hazardous substances, hazardous wastes, pollutants, or contaminants found at, taken to or taken from the Site.
25. To the extent that the loaded trailers located outside the 500-E Radar Road Facility and the empty trailers now located at Greensboro Trailer Sales and Service, Inc. are presently owned by parties other than those bound by this CONSENT ORDER, the Respondents will use their best efforts to obtain access agreements from the present owners within thirty (30) days of the effective date of this CONSENT ORDER. Such agreements shall provide reasonable access to EPA and/or its authorized representatives. In the event such access agreements are not obtained within the time referenced above, Respondents shall notify EPA regarding both the lack of, and the efforts which were made to obtain such agreements.
26. All actions required to be taken pursuant to this CONSENT ORDER shall be undertaken in accordance with the requirements of all applicable local, state and Federal laws and regulations.
27. Respondents by signing this CONSENT ORDER, waive any claims they might have that the defenses set forth in Section 107(b) of CERCLA (42 U.S.C. § 9607(b)) apply to them in connection with actions required by this CONSENT ORDER, including 40 C.F.R. Part 761 Subpart D with respect interim storage and disposal of PCBs and PCB items.
28. This CONSENT ORDER does not constitute preauthorization of funds under Section 111(a)(2) of CERCLA.
29. No informal advice, guidance, suggestions or comments by EPA regarding reports, plans, specifications, schedules or any other writing submitted by the Respondents shall be construed as relieving Respondents of their obligation to obtain such formal approvals as may be required herein.
30. The provisions of this CONSENT ORDER shall be deemed satisfied and the CONSENT ORDER shall be terminated upon the Respondents' receipt of written notice from EPA that the Respondents have demonstrated that all of the terms of this CONSENT ORDER have been completed. EPA shall promptly notify Respondents in writing if the report submitted at the completion of all work set forth in the Cleanup Plan does not

demonstrate that all the terms of this CONSENT ORDER have been completed. EPA shall describe in writing any deficiencies that must be addressed to complete the terms of this CONSENT ORDER.

31. In consideration of the communications between the Respondents and EPA prior to the issuance of this CONSENT ORDER concerning its terms, the Respondents agree that there is no need for a settlement conference prior to the effective date of this CONSENT ORDER. Therefore, the effective date of this CONSENT ORDER shall be the date on which it is signed by EPA.

Entered with the agreement and consent of the parties:

AIRPORT WAREHOUSE PARTNERSHIP

Date:

12/17/85

By:

  
General Partner

Entered with the agreement and consent of the parties:

BCI Property Company No 31

By: ALBUNDI  
General Partner

Date: December 17, 1985

Entered with the agreement and consent of the parties:

By: W. J. Fahrner

Date: 12/18/85

W. J. Fahrner  
Manager-Materials  
Detroit Edison Company

Entered with the agreement and consent of the parties:

By: *A. C. Thies*

Date: 12/18/85

A. C. Thies  
Executive Vice President  
Duke Power Company

Entered with the agreement and consent of the parties:

By: Earl B. Parsons, Jr.

Date: \_\_\_\_\_

12/19/85

Earl B. Parsons, Jr.  
Vice-President-Electric Operations  
Gulf Power Company

Entered with the agreement and consent of the parties:

By:

Bernard Adkins

Date:

12/17/85

for Kansas Gas & Electric

Entered with the agreement and consent of the parties:

By: P. H. Benziger <sup>201</sup> Date: 12/18/85  
Peter H. Benziger  
Senior Vice President - Generation  
Potomac Electric Power Company

Entered with the agreement and consent of the parties:

By: 

D. E. Felsing  
Vice President  
San Diego Gas  
& Electric Company

Date: 12/17/85

Entered with the agreement and consent of the parties:

*Savannah Electric and Power Company*

By: *L. Olin Yealy*

Date: *December 17, 1985*

*Senior Vice President*

Entered with the agreement and consent of the parties:

By: T. C. Nichols, Jr.

T. C. Nichols, Jr.  
South Carolina Electric  
& Gas Company

Date: 12/17/85

Entered with the agreement and consent of the parties:

By: Charles M. Santy

Date: 19 Dec 85

Southern California Edison Company

APPROVED AS TO FORM:  
JOHN R. BURY  
Vice President and General Counsel  
By: Deborah Kubitt Felt  
Secretary  
Dec. 19, 1985

Entered with the agreement and consent of the parties:

By: D.E. Ward

Date: 12/17/85

Vice President  
Engineering and Operations  
Southwestern Electric Power Company

Entered with the agreement and consent of the parties:

By:



D. E. Ellestad  
Director of Electrical  
Engineering & Procurement  
Wisconsin Power &  
Light Company

Date:

Dec 18, 1985

Entered with the agreement and consent of the parties:

By: \_\_\_\_\_

Date: \_\_\_\_\_

By: *John A. Little* Deputy for  
Jack E. Ravan

Date: Dec. 20, 1985

Regional Administrator  
Region IV  
U.S. ENVIRONMENTAL PROTECTION  
AGENCY

RESPONDENTS

Airport Warehouse Partnership  
Greensboro, NC

BCI Property Company #31  
Greensboro, NC

Detroit Edison Company  
Detroit, MI

Duke Power Company  
Charlotte, NC

Gulf Power Company  
Pensacola, FL

Kansas Gas & Electric Company  
Wichita, KS

Mississippi Power & Light Company  
Jackson, MS

Pacific Gas & Electric Company  
San Francisco, CA

Potomac Electric Power Company  
Washington, D.C.

San Diego Gas & Electric Company  
San Diego, CA

Savannah Electric & Power Company  
Savannah, GA

South Carolina Electric & Gas Company  
Columbia, SC

Southern California Edison Company  
Rosemead, CA

Southwestern Electric Power Company  
Shreveport, LA

Wisconsin Power & Light Company  
Madison, WI

Wisconsin Public Service Corporation  
Green Bay, WI

Attachment B  
SED Inc. Site

PARTICIPATING RESPONSIBLE PARTIES

STATEMENT OF WORK  
SED SITE CLEANUP, GREENSBORO, N.C.

The Respondents, through their Contractors (See Footnote), and with the oversight and assistance of Clean Sites, Inc. (CSI), will perform the following activities resulting in the cleanup of the SED, Inc. facilities. The Work consists of:

1. Initial Activities

- a. Posting of warning signs: Contractor will establish a restricted area around the unoccupied SED facility as part of the Health and Safety Plan (described below) and will post warning signs to clearly indicate the boundaries of this area. The warning signs will be printed with the legend "Danger--Keep Out". The signs will be weather resistant and reflective at night.
- b. Review existing data: CSI with assistance of Contractor will assemble all reports, studies, manifests, trip tickets, and other information necessary to initially characterize the SED facility. Contractor will prepare a facility plan showing the location and character of any drains or other conduits of any description that could serve to transport contaminated liquids from the SED facility to the surrounding environment. To the extent possible, CSI with assistance of Contractor will determine the nature and amounts of all contaminated materials within the SED facility boundaries. CSI with assistance of Contractor will evaluate the data and identify any additional information required to effect remedial actions.

2. Develop Project Work Plans:

Plans will be developed by Contractor and will be reviewed by Clean Sites, Inc. These plans will guide all project activities and will include the following:

- a. Health and Safety: before any work is performed at the site Contractor will prepare a site-specific Health and Safety Plan. The plan will include, at a minimum:

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\*/ It is possible that more than one contractor will be involved in the work. The use of the term "Contractor" herein is generic, and refers to the specific contractor for the element of the cleanup.

- i) a designation of areas of contamination, decontamination, and project management
- ii) types of protective clothing
- iii) safe working practices
- iv) contingency planning

This plan will be consistent with any relevant guidance provided by the U.S. EPA documents "Guidance for Remedial Investigations under Superfund", and "The Interim Standard Operating Safety Guides" (September 1982 revision) and with applicable NIOSH/OSHA guidelines.

- b. Quality Assurance/Quality Control (QA/QC): Before any work is performed at the site, Contractor will prepare a plan describing the measures to be taken to assure the quality of any sampling and analysis of materials at the SED site. This plan should be consistent with guidance provided by the Region IV EPA Services Division Standard Operating Procedures Environmental Manual. The QA/QC plan will also describe the measures to be taken to ensure the proper destruction and/or other final disposition of all contaminated materials, including inspections of disposal facilities used, and manifests.
- c. Sampling/Analysis: Contractor will develop a plan describing procedures to be followed in any initial site survey, characterization of the materials at the SED facility (Phase I), and the sampling following decontamination of the SED facility (Phase II). The plan will describe the location of the samples, the reason for selecting this location and type of sample, the methods for obtaining and storing the samples, chain-of-custody procedures and the manner by which the results will be reported.

### 3. Removal and Disposal of Liquids

Contractor will remove and destroy, or otherwise treat, all contaminated liquids within the SED facility boundaries. The liquids include those contained in drums, and any other containers and include free standing liquids that may be present in drains, sumps, floor depressions or any other areas. Contractor will provide for any bulking, overpacking or other measures that ensure safe transport of the materials. Contractor will ensure that the portion of any facility that receives the wastes for treatment and/or destruction is in compliance with all Federal, State and local requirements.

4. Removal and Disposal of Other Contaminated Materials

Contractor will remove and destroy, or otherwise treat, all contaminated materials within the SED facility boundaries. These materials include, but are not limited to, rags, papers, empty drums or other containers, pallets, and any other debris of any description that is not an integral part of the building structure.

5. Decontamination - Scope of Work

Decontamination of the warehouses and trailers identified in the Consent Order shall be accomplished by completing the steps set forth in this Statement of Work. Upon completion of the steps set forth below and the submission of a written report to EPA summarizing the decontamination steps taken, the obligations of Respondents under the Consent Order shall be satisfied, and no further decontamination work shall be required.

6. Decontamination of the Trailers

The eleven trailers (eight loaded trailers outside the Radar Road warehouse; three empty trailers at Greensboro Trailer Sales and Services, Inc.) shall be decontaminated in the following manner:

- a. All wooden materials shall be removed and incinerated in an approved PCB incinerator.
- b. The trailers then shall be disposed of in an approved chemical waste landfill.

7. Decontamination of the Warehouses

The investigation to determine the extent of contamination in the warehouse at 6205 Swing Court shall be completed in accordance with directions from the EPA On-Scene Coordinator (OSC). The EPA OSC will then specify what decontamination activities shall be required, if any. Such decontamination activities, if required, shall be no more extensive than those actions specified for the other two warehouses as provided below in this Section 7.

The warehouses at 500-E Radar Road and 6219 Swing Court shall be decontaminated in the following manner:

- a. The following materials shall be removed and disposed of by incineration at an approved PCB incinerator, in an approved chemical waste landfill, or, if PCB levels fall below 50 ppm or an equivalent standard for surface contamination, in a sanitary landfill:

- (1) All interior walls and structures made of wood, sheetrock or other similar material;
  - (2) All carpet;
  - (3) All removable ceiling tiles; and
  - (4) Furniture and related items.
- b. All ductwork, lighting and heating units inside the warehouse shall be removed. Then they will be triple-rinsed using water and trisodium phosphate and disposed of as scrap in a controlled manner, in an approved chemical waste landfill or, if PCB levels fall below 50 ppm or an equivalent standard for surface contamination, in a sanitary landfill; or, alternatively, they will be incinerated, without cleaning, at an approved PCB incinerator.
- c. Near the back door of the warehouse at 6219 Swing Court, the concrete floor has a chipped-out depression. The depression is approximately two feet long and eight inches wide. At its deepest point, the depression does not penetrate the concrete slab. At the bottom of the depression, there remains about 1 1/2 inches of concrete floor. A crack runs through the depression. Sampling indicated that the dirt, gravel, and grime that had collected in the depression contained high levels of PCBs and that, at much lower levels, PCBs had moved through the crack into the several inches of soil below the depression. The concrete in and around the depression and the contaminated soil beneath it (i.e., soil containing greater than 50 ppm PCB) will be removed. Clean soil will be used as fill beneath the floor and new concrete will be poured to replace the portion that is removed.
- d. Any additional areas of the concrete floors similarly contaminated to that described in Item c. above will be similarly removed and replaced.
- e. During cleaning, the perimeter of the floor at its interface with the walls and openings shall be sealed using a vinyl strip and silicone.
- f. Ceilings, roof supports, walls and floors shall be hydroblasted under pressure of at least 1000 psi using water. The resulting wastewater shall be filtered through a charcoal filter. After PCB levels in the wastewater have been reduced through filtration to levels sufficiently low to allow its discharge to the sanitary sewer system and after the appropriate approvals have been received local wastewater shall be

discharged to the sanitary sewer system. The charcoal filter shall be disposed by incineration at an approved PCB incinerator.

- g. Ceilings, roof supports and walls shall be hydroblasted once under pressure using water and trisodium phosphate in a concentration of 4-9% by weight.
- h. The floors shall then be hydroblasted a second and third time, using water and trisodium phosphate in a concentration of 4-9% by weight.
- i. After steps a. through h., the concrete floors and walls shall be sealed using polyurethane or epoxy sealant.

#### 8. Field Studies

Contractor will perform studies to determine the nature and extent of the problem at the site and to gather all necessary data to determine and support final response activities. Contractor will furnish all personnel, materials, and services necessary for, or incidental to, performing the work. The field studies will be performed in two phases which are described below.

##### Phase I - Initial Studies

Contractor will determine the current character of the SED facility and will evaluate any actual and/or potential problems resulting from the storage, leaking and/or spilling of contaminated materials at the site. This work includes the review of all relevant background materials, as described in paragraph 1 above (Initial Activities) and may include additional sampling and analysis if needed to sufficiently characterize the site to allow effective remedial response. It is expected that there may be a certain amount of waste characterization to be performed before the removal of liquids. If any sampling and analysis are performed they will be done in accordance with the chain-of-custody procedures set forth in QA/QC plan and/or the sampling plan.

##### Phase II - Final Sampling

Following the decontamination of any warehouses (steps 7-a through 7-h above) but prior to the application of any sealants (step 7-i) Contractor will perform a comprehensive evaluation of site conditions to determine the nature and extent of any remaining contamination. Contractor will conduct a program to determine the concentrations of contaminants at various locations in and

around the warehouse. These locations include, but are not limited to, warehouse, including all associated office space, (walls, floor, ceilings, windows, loading dock, etc.), surrounding parking areas, any surface and/or subsurface drains, pipes, grates spillways, or other conduits for the transportation of the contaminants from the warehouse or surrounding areas, and the site entrance and roadway.

9. Reports, Notifications and Inspections

In addition to the plans describing the procedures to be used for site remediation, Contractor will prepare three reports plus periodic status reports. The first report will summarize the results of the Phase I study, above. This report will provide a description of the site including the total area of the site, the general nature of the facility and its contents, and the nature and extent of the problem. The report will include a site map showing all buildings, utilities, drains, paved areas, tanks, and other features. The map should be of sufficient accuracy and detail to locate and report all existing and future work at the site.

The second report will summarize the results of the Phase II sampling. This report will be submitted to the OSC by CSI at least seven days prior to the application of any sealants (step 7-i above).

Respondents shall notify EPA in writing when the decontamination work set forth in this Statement of Work begins. EPA shall have the right to inspect and observe any decontamination work performed in accordance with this Statement of Work. Within fourteen (14) days after completion of all work set forth in this Statement of Work, Respondents shall submit in writing to EPA a report summarizing the steps that were taken to decontaminate the warehouses and trailers, and certifying the completion of this Statement of Work.

During the performance of the work described in this Statement of Work, the Respondents shall provide periodic status reports to the OSC. These reports shall be provided monthly, or as otherwise agreed among the parties, until the completion of the decontamination of the facilities. Thereafter, they shall be provided quarterly until the completion of all work called for by this Statement of Work. These reports shall include descriptions of the work performed during the immediately previous reporting period and of the work planned for the following reporting period, and shall also include summaries of manifests and destruction reports.

**10. Time Schedules**

All containers of PCB-containing liquids, PCB capacitors, PCB transformers and PCB contaminated materials not an integral part of the building shall be removed from the facilities within six (6) months of the effective date of this Consent Order.

All aspects of the work described in this Statement of Work, including but not limited to the removal and disposal of materials and the decontamination of the trailers and warehouses, shall be completed within twenty-four (24) months of the effective date of this Consent Order.

The decontamination steps set forth in this Statement of Work shall begin within twenty (20) days after all containers of PCB-containing liquids, PCB capacitors, PCB transformers and PCB-contaminated materials have been removed from the warehouses and trailers. The decontamination steps set forth in this Statement of Work shall be completed, and a written report shall be submitted to EPA, within 120 days after the decontamination work begins.

**11. Work Accomplished Prior to Consent Order**

It is recognized and acknowledged that portions of the work described by this Statement of Work have been completed prior to the effective date of the Consent Order. Specifically, these include some aspects of work described in Sections 1, 8 and 9 of this Statement of Work.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET  
ATLANTA, GEORGIA 30365

OCT 01 1985

4WD-ER

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED



(See attached list)

Re: SED, Inc. Site  
6219 Swing Court and 500-E Radar Rd.  
Greensboro, NC

Dear Sir:

The United States Environmental Protection Agency (EPA) is considering spending public funds to investigate and take corrective action for the control of releases and threatened releases of hazardous substances at the above-referenced site. This action is being taken pursuant to Section 104 and other provisions of the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.C. §9601 et seq. (CERCLA). This site consists of two separate facilities; the Radar Road facility is an abandoned warehouse that was used for the storage of polychlorinated biphenyls (PCB's) and PCB contaminated material, and the Swing Court facility is an abandoned warehouse used for the storage and processing of PCB's.

Responsible parties under CERCLA include the current and former owners or operators and persons who generated hazardous substances or were involved in the transport, treatment, or disposal of them at the site. Under Section 107(a) of CERCLA and other laws, responsible parties may be liable for any costs incurred by the government in taking corrective actions at the site. Such costs may include, but may not be limited to, expenditures for investigation, planning, cleanup of the site, and enforcement. By this letter, therefore, EPA intends to notify you of your potential liability with regard to this matter and to encourage you, as a potentially responsible party, to undertake voluntary cleanup activities.

EPA has reason to believe that you may be a responsible party. More specifically, the Agency has reason to believe that you are a generator of the waste present on-site.

EPA has determined that there is a threat of release of hazardous substances at the above-referenced site. Both facilities contain drums of PCB-laden liquid (approximately 60 to 70% PCB), PCB capacitors, transformers and PCB-contaminated materials such as soil, debris, rags, etc. The drums are stacked so high that they are beginning to collapse under the continuous pressure. The PCB materials are stored such that they present a fire hazard. As a result of

such a threatened release, Horsepen Creek, Buffalo Creek and the trailer park next to the Swing Court facility may be adversely affected.

This letter is also to notify you that EPA is currently planning to conduct the following activities at the SED, Inc. Site:

1. Removal of all contaminated materials and the transport and disposal of such materials at an approved hazardous waste facility.
2. Decontamination of both warehouses.

Under Section 107(a)(4)(A) and (B) of CERCLA, where the Agency uses public funds to effectuate the cleanup of a hazardous substance, a responsible party may be liable for all costs associated with the removal or remedial action and all other necessary costs incurred in cleaning up the site. You should contact the Agency's representative if you desire more information.

You should notify EPA in writing within five (5) calendar days from the receipt of this letter of your willingness to conduct or participate in the above-mentioned actions. Otherwise, EPA will assume that you decline any involvement, and will proceed with its efforts to have the site cleaned up.

Your letter should indicate the appropriate name, address, and telephone number for further contact with you and include a statement of your desire to perform or participate in the removal actions. Where you are already involved in discussions with state or local authorities, engaged in voluntary action, or involved in a lawsuit regarding this site, you should continue that activity and report the status of those discussions or that action in your letter. Please provide a copy of your letter to any other parties involved in those discussions.

Your letter should be sent to:

Mr. Shane Hitchcock  
Emergency and Remedial Response Branch  
U. S. Environmental Protection Agency  
345 Courtland St., NE  
Atlanta, GA 30365

If you require further information, please contact either Mr. Hitchcock at 404/881-3931 or Mr. Reuben Bussey, Assistant Regional Counsel at 404/881-2641.

EPA would like to encourage good faith negotiations between you and the Agency and between you and the other parties potentially responsible for the SED, Inc. Site. A steering committee has been formed between a number of the other potentially responsible parties. The contact person for this steering committee is Mr. Vance Hughes of Clean Sites, Inc. Mr. Hughes can be reached at (703)688-8522.

In addition, EPA is seeking to obtain certain information from you. Under the provisions of Section 104 of CERCLA, 42 U.S.C. §9604, and Section 3007 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §6927, as amended by the Solid Waste Disposal Act Amendments of 1980, the Administrator of the Environmental Protection Agency has the authority to require any person who generates, stores, treats, transports, disposes of, or otherwise handles or has handled hazardous wastes and substances to furnish information related to such wastes and substances. Pursuant to these statutory provisions, you are hereby requested to provide the following information:

1. A description of the material that your company had stored, disposed of, or processed at the site.
2. For each of such materials, an estimate of the total volume that was transported to the SED, Inc. facilities.
3. Specify which of the two facilities your company utilized.
4. Provide copies of any transactions your company had with the SED, Inc. facility.
5. Identify any party who transported hazardous substances on your behalf to the site.

For the above information, please describe the types of records that you maintained of the disposal activities at, or transportation of hazardous materials to the site including the date of the records, the author of the records, the current location of the records, the current custodian, and all efforts that were taken to identify such records. Pursuant to Section 103 of CERCLA, it is unlawful for any person knowingly to falsify, destroy, mutilate, erase, dispose of, conceal, or otherwise render unavailable or unreadable any records.

In addition to the above information, if you are privately insured against releases of hazardous wastes and substances as a result of the handling of such materials, please inform us of the existence of such insurance and provide us with copies of all insurance policies in effect during the period of activity in question.

Your answers to these questions must be sent to EPA (at the above address) within ten (10) calendar days of your receipt of this letter. In addition, under Section 3008 of RCRA, 42 U.S.C. §6928, failure to comply with this request may result in an order requiring compliance or a civil action for appropriate relief. Section 3008 also provides for civil penalties. Failure to comply with this request under Section 104 of CERCLA may result in a civil enforcement action being brought against you by EPA.

The factual and legal discussions contained in this letter are intended solely for notification and edification purposes. They are not intended to, do not, and may not be relied upon as a final Agency position on any matter set forth herein.

Due to the seriousness of the problem at this site and the attendant legal ramifications, the Agency strongly encourages you to submit a written response within the time frame specified herein.

Sincerely yours,

*George L. Herlow*

*for* Thomas W. Devine, Director  
Waste Management Division

✓ cc: William Meyer  
NC Solid and Hazardous Waste

~~48~~, 1983 - 84

① Chrysler Center  
1200 Chrysler Drive  
Highland Park, MI 48288

Ⓐ Chrysler-Newcastle Plant

- Kokomo Trans.
- Huber Foundry
- Detroit Forge
- Trenton Chemical
- Trenton Engine
- Winfield Foundry
- Indy Foundry
- Mound Engine
- Sterling Hts.
- Toledo Machining
- Electrical
- Eldon Axle
- Proving Grounds
- Warren Truck J+L
- Newcastle
- Outer Drive
- Marysville Parts
- Oakland Center

② Transformer Inspection  
2704 Normandy Rd  
Royal Oak, MI 48073

③ Ind. and Auto Fasteners  
3200 West Fourteen Mile  
Royal Oak, MI 48073

- ④ Tuff Machine Company  
25770 Groesbeck  
Warren, MI 48089
- ⑤ City of Niles, B.P.W.  
P.O. Box 217  
Niles, MI 49120
- ⑥ Quaker Chemical  
14301 Birwood  
Detroit, MI 48238
- ⑦ Pearless Gear  
1020 Clinton - Tecumseh Rd.  
Clinton, MI 49236
- ⑧ Detroit Public Lighting  
9449 Grinnel  
Detroit, MI 48213
- ⑨ Volkswagon of America, Inc.  
P.O. Box 5022  
Strling Hts, MI 48077
- 10) Doublejack Electric  
1211 N. Campbell  
Royal Oak, MI 48067
- ⑪ Waggoner Corporation  
1400 Rochester Rd.  
Troy, MI 48064
- ⑫ Pearless Manufacturing  
2800 Tyler Rd.  
Ypsilanti, MI 48197
- ⑬ Thermofil Corporation  
6150 Whitmore Lake Rd.  
Brighton, MI 48116
- ⑭ U.S. Manufacturing Corp.  
17755 Masonic  
Fraser, MI 48134
- ⑮ Guardian Industries  
14600 Romine Rd.  
Carleton, MI 48117
- ⑯ National Gypsum Co.  
Ford Avenue  
Alpena, MI 49707
- ⑰ Alpena Power Co.  
310 N. Second Av.  
Alpena, MI 49707

(48) Molloy Manufacturing  
18450 15 Mile Road  
Fraser, MI 48026

(49) Lansing Board of Water  
3100 Alpha Street  
Lansing, MI 48901

(50) Great Lakes Steel  
Tecumseh Rd.  
Ecorse, MI 48229

(51) Hydramatic - Willow Run  
Ypsilanti, MI 48197

\* (52) Michigan DNR  
P.O. Box 30028/Mason Bldg.  
Lansing, MI 48909  
517-373-3303

(53) Rieke Corporation  
500 W. 7th St.  
Auburn, IN 46706

(54) Renaissance Ctr. / Tirc  
P.O. Box 1803  
Detroit, MI 48121

(25) Hydra-Matic, Warren Plant  
23500 Mound Rd.  
Warren, MI 48091

(26) Wyandotte Municipal Svcs.  
3605 11th St.  
Wyandotte, MI 48192

(27) State Prison, S. Michigan  
4000 Cooper St.  
Jackson, MI 49201

(28) Presque Isle Corporation  
P.O. Box 426  
Alpena, MI 49707

(29) Fisher Body - Fleetwood  
W. Fort + West End Ave.  
Detroit, MI 48248

(30) Fritz Enterprises / Tirc  
23550 Pennsylvania  
Taylor, MI 48180

(31) Inland Lime + Stone Co.  
Inland Harbor Rd.  
Gulliver, MI 49840

- (32) Ajax Rolled Ring  
36500 Van Born Rd.  
Wayne, MI 48184
- (33) Republic Tool & Die  
45000 Van Born Rd.  
Belleville, MI 48111
- (34) Board of Water & Light  
3100 Alpha St.  
Lansing, MI 48901
- (35) Sun Pipeline Company  
7155 Inkster Rd  
Taylor, MI 48180
- (36) J.D. Phillips Co.  
181 N. Industrial  
Alpena, MI 49707
- (37) Traverse City Lt. & Power  
S. Airport Rd., West  
Traverse City, MI 49684
- (38) Reef Industries, Inc.  
50903 E. Russell Schmidt  
Mt. Clemens, MI 48045
- (39) United Steel Company  
27 Fonda St.  
Battle Cr., MI 49016
- (40) Detroit Diesel - Allison  
36880 Ecorse Rd.  
Romulus, MI 48174
- (41) Hardy Salt Company  
1501 Main St.  
Manistee, MI 49660
- (42) Edwards Brothers, Inc.  
2500 S. State St.  
Ann Arbor, MI 48106
- (43) Eastern Michigan University  
Physical Plant  
Ypsilanti, MI 48197
- (44) General Die Company  
13700 Mt. Elliot  
Detroit, MI 48212

S.F.D.  
GREENSBORO

jenney 8-2-85

CALL FROM JIHANE HITCHCOCK, EPA REGION IV  
(404) 881-3931

THERE ARE 135 GEN. (LETTERS HAVE BEEN SENT TO THESE BY EPA  
TOP 14 GEN, GENERATE 80% OF WASTE  
(6-7 MILLION LBS OF MATERIAL)

THERE IS A STEERING COMMITTEE OF THE GENERATORS

CLEAN SITES, INC. IS WORKING WITH THE  
STEERING COMMITTEE & EPA

IT IS ESTIMATED THAT IT WOULD TAKE 18 MO.  
FOR INCIN. TO DESTROY THE MATERIAL:  
THERE IS ALSO A MOBILE INCIN. WHICH COULD  
POSSIBLY BE USED TO AN ECONOMIC ADVANTAGE  
(NO DECISION ON HOW DISPOSAL WILL BE  
HANDLED)

IT IS EXPECTED THAT A CONCENT  
ORDER WILL BE SIGNED WITHIN THE  
NEXT FEW WEEKS CONCERNING REMOVAL &  
DECONTAMINATION PLAN.

\* CLEAN SITES INC.: A GROUP FUNDED BY THE  
CHEMICAL INDUSTRY THAT NEGOTIATES WITH COS.  
& EPA; ALSO PROVIDE TECHNICAL OVERVIEW  
(THIS GROUP DOES NOT REPRESENT THE CHEM IND)



*Specialists in  
chemical and environmental  
management*

P.O. Box 10383  
Greensboro, North Carolina 27404  
(919) 855-7925

October 10, 1985

Mr. Shane Hitchcock  
Region IV  
U. S. Environmental Protection Agency  
345 Courtland Street, NE  
Atlanta, GA 30365

Dear Mr. Hitchcock:

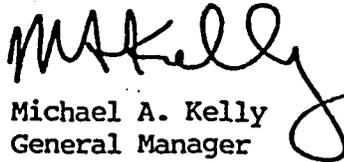
Enclosed please find copies of lab analyses for PCB wipe tests done at the SED warehouses in Greensboro, North Carolina, as well as wipe tests from the floors of the 11 trailers used by SED.

The analyses on the trailers and the Radar Road warehouse were done in May and June of this year. We sampled the Swing Court facility last week.

I have attached a sketch map of the warehouses showing the point of sampling.

Please feel free to call should you have any questions.

Kindest regards,

  
Michael A. Kelly  
General Manager

clb

Enclosure

cc Mr. Gordon Jolly, Clean Sites, Inc.

BROOKS, PIERCE, McLENDON, HUMPHREY & LEONARD

ATTORNEYS AND COUNSELLORS AT LAW  
SUITE 1400 WACHOVIA BUILDING

GREENSBORO, NORTH CAROLINA 27402  
(919) 373-8850

THORNTON H. BROOKS  
CLAUDE C. PIERCE  
L. R. McLENDON, JR.  
HUBERT HUMPHREY  
EDGAR B. FISHER, JR.  
JERRY W. AMOS  
W. ERWIN FULLER, JR.  
JAMES T. WILLIAMS, JR.  
M. DANIEL MCGINN  
MICHAEL D. MECKER  
JOHN L. SARRATT  
WILLIAM G. McNAIRY  
EDWARD C. WINSLOW III  
HOWARD L. WILLIAMS  
GEORGE W. HOUSE  
WILLIAM P. H. CARY

REID L. PHILLIPS  
ROBERT A. SINGER  
JOHN H. SMALL  
RANDALL A. UNDERWOOD  
GERARD M. CHAPMAN  
S. LEIGH RODENBOUGH III  
R. MARSHALL MERRIMAN, JR.  
WILLIAM G. ROSS, JR.  
JILL R. WILSON  
MARC D. BISHOP  
JIM W. PHILLIPS, JR.  
MACK SPERLING  
R. ANDREW FINKLE  
NANCY K. PLANT  
JAMES R. SAINTSING  
MELISSA H. WEAVER

AUBREY L. BROOKS (1872-1958)  
W. H. HOLDERNISS (1904-1965)  
L. R. McLENDON (1890-1968)  
KENNETH M. BRIM (1898-1974)  
C. T. LEONARD, JR. (1929-1983)

OF COUNSEL:  
G. NEIL DANIELS

MAILING ADDRESS  
R. O. DRAWER U

TELEX: 574301

October 8, 1985

Mr. A. Shane Hitchcock  
United States Environmental  
Protection Agency  
345 Courtland Street, N.E.  
Atlanta, GA 30365

Re: SED Sites in Greensboro, N.C. - Results of  
Surface Sampling and Discussion of Solid Surface  
Decontamination

Dear Shane:

Enclosed as promised are the results of the surface sampling  
at the Radar Road and Swing Court warehouses and in the trailers  
at Radar Road. Steve Earp and I will be in touch shortly to  
discuss these with you and to set up the meeting in Greensboro.

Sincerely,

William G. Ross, Jr.

WGR/cb

cc: Mr. Steve Earp

G

BROOKS, PIERCE, McLENDON, HUMPHREY & LEONARD

ATTORNEYS AND COUNSELLORS AT LAW  
SUITE 1400 WACHOVIA BUILDING

GREENSBORO, NORTH CAROLINA 27402

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October 4, 1985

OF COUNSEL  
G. NEILDANIELS

MAILING ADDRESS  
P. O. DRAWER U

TELEX: 574301

Mr. A. Shane Hitchcock  
United States Environmental  
Protection Agency  
345 Courtland Street, N.E.  
Atlanta, GA 30365

Re: SED Sites in Greensboro, N.C. - Results of  
Surface Sampling and Discussion of Solid Surface  
Decontamination

Dear Shane:

Steve Earp and I appreciated your thoughts yesterday on the subject of decontaminating the Swing Court and Radar Road warehouses. In our conversation, you expressed an interest in early receipt of the results of the sampling of the surfaces in the warehouses. Based on what I learned from Ecoflo after we talked, we will be able to provide you those results no later than next Friday, October 11.

Steve and I would like to meet with you here in Greensboro sometime during the following week (i.e., the week of October 14). As the three of us talked about, we can discuss the subject of decontamination most productively when we can actually observe the surfaces we are talking about decontaminating and when we have before us sample results that indicate the areas that are likely to be of most concern. We will call you next week to find a mutually convenient time for the meeting.

You indicated during our conversation that you would like to reach an agreement with the PRP's as to specific areas to be decontaminated and particular methods to be used. At the meeting in Greensboro, we will have ready for you some thoughts from the PRP's on the subject of appropriate techniques for decontaminating the different types of surfaces present in the warehouses. We hope that information will be useful to you and your colleagues.

Mr. Shane Hitchcock  
Page Two  
October 4, 1985

From these various discussions and reviews should come, we hope, consent order provisions on the subject of decontamination that will be acceptable to your agency and to the PRP's as well. We look forward to working with you to resolve this issue.

Sincerely,



William G. Ross, Jr.

WGR/cb

# PIEDMONT RESEARCH LABORATORIES

Division Of

GUILFORD LABORATORIES, INC.

OCTOBER 4, 1985

JOB#: EF51001

CUSTOMER: ECOFLO

SAMPLE: #P1495 2AKG-001 THRU #P1504 2AKG-010  
(area wiped was 10 3/4" x 10 3/4")

REQUEST: CHECK FOR PCB'S

## RESULTS

<u>locations</u>	<u>PCB(total ug)</u>	<u>PCB(ug/square inch)</u>
#P1495 ①	12500	108.2
#P1496 ②	50000	432.7
#P1497 ③	192500	1666
#P1498 ④	27500	238.0
#P1499 ⑤	1850	16.0
#P1500 ⑥	62500	540.8
#P1501 ⑦	6125	53.0
#P1502 ⑧	3175	27.5
#P1503 ⑨	1675000	14490
#P1504 ⑩	35000	302.9

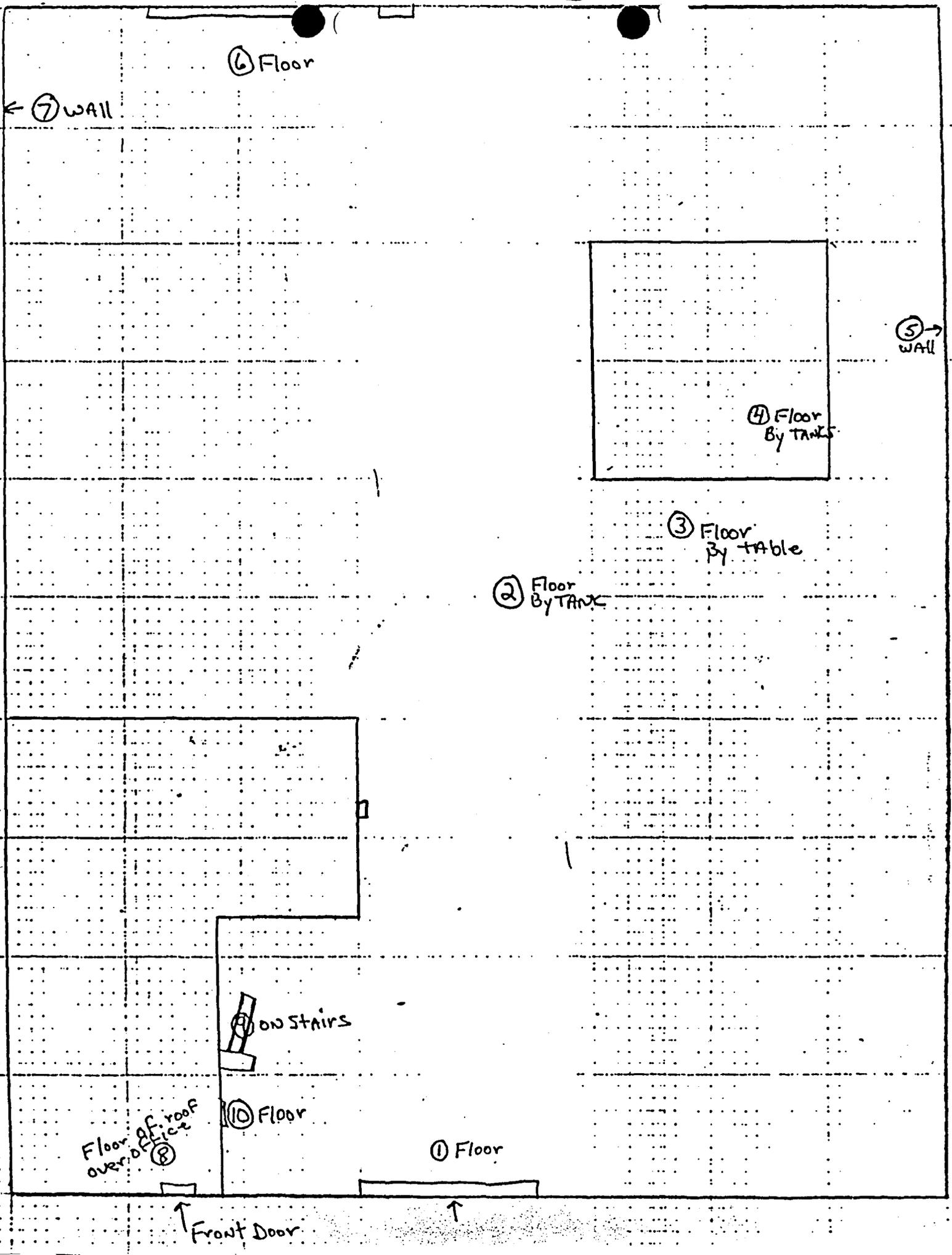
All wipe samples showed a mixture of Aroclor 1242 and 1254.

PIEDMONT RESEARCH LABORATORIES  
DIVISION OF GUILFORD LABORATORIES, INC.



J.A. RAYBURN

Swing Court / Samples





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV  
345 COURTLAND STREET  
ATLANTA, GEORGIA 30365



4WD-ER

AUG 12 1985

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Burlington Testing Company  
Ellis Street  
P. O. Box 459  
Burlington, NJ 08016

Re: SED, Inc. Site  
6219 Swing Court and 500-E Radar Rd.  
Greensboro, NC

Dear Sir:

The United States Environmental Protection Agency (EPA) is considering spending public funds to investigate and take corrective action for the control of releases and threatened releases of hazardous substances at the above-referenced site. This action is being taken pursuant to Section 104 and other provisions of the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.C. §9601 et seq. (CERCLA). This site consists of two separate facilities; the Radar Road facility is an abandoned warehouse that was used for the storage of polychlorinated biphenyls (PCB's) and PCB contaminated material, and the Swing Court facility is an abandoned warehouse used for the storage and processing of PCB's.

Responsible parties under CERCLA include the current and former owners or operators and persons who generated hazardous substances or were involved in the transport, treatment, or disposal of them at the site. Under Section 107(a) of CERCLA and other laws, responsible parties may be liable for any costs incurred by the government in taking corrective actions at the site. Such costs may include, but may not be limited to, expenditures for investigation, planning, cleanup of the site, and enforcement. By this letter, therefore, EPA intends to notify you of your potential liability with regard to this matter and to encourage you, as a potentially responsible party, to undertake voluntary cleanup activities.

EPA has reason to believe that you may be a responsible party. More specifically, the Agency has reason to believe that you are a generator of the waste present on-site.

EPA has determined that there is a threat of release of hazardous substances at the above-referenced site. Both facilities contain drums of PCB-laden liquid (approximately 60 to 70% PCB), PCB capacitors, transformers and PCB-contaminated materials such as soil, debris, rags, etc. The drums are stacked so high that they are beginning to collapse under the continuous pressure. The PCB materials are stored such that they present a fire hazard. As a result of

such a threatened release, Horsepen Creek, Buffalo Creek and the trailer park next to the Swing Court facility may be adversely affected.

This letter is also to notify you that EPA is currently planning to conduct the following activities at the SED, Inc. Site:

1. Removal of all contaminated materials and the transport and disposal of such materials at an approved hazardous waste facility.
2. Decontamination of both warehouses.

Under Section 107(a)(4)(A) and (B) of CERCLA, where the Agency uses public funds to effectuate the cleanup of a hazardous substance, a responsible party may be liable for all costs associated with the removal or remedial action and all other necessary costs incurred in cleaning up the site. You should contact the Agency's representative if you desire more information.

You should notify EPA in writing within five (5) calendar days from the receipt of this letter of your willingness to conduct or participate in the above-mentioned actions. Otherwise, EPA will assume that you decline any involvement, and will proceed with its efforts to have the site cleaned up.

Your letter should indicate the appropriate name, address, and telephone number for further contact with you and include a statement of your desire to perform or participate in the removal actions. Where you are already involved in discussions with state or local authorities, engaged in voluntary action, or involved in a lawsuit regarding this site, you should continue that activity and report the status of those discussions or that action in your letter. Please provide a copy of your letter to any other parties involved in those discussions.

Your letter should be sent to:

Mr. Shane Hitchcock  
Emergency and Remedial Response Branch  
U. S. Environmental Protection Agency  
345 Courtland St., NE  
Atlanta, GA 30365

If you require further information, please contact either Mr. Hitchcock at 404/881-3931 or Mr. Reuben Bussey, Assistant Regional Counsel at 404/881-2641.

EPA would like to encourage good faith negotiations between you and the Agency and between you and the other parties potentially responsible for the SED, Inc. Site. The names of the other potentially responsible parties (PRP's) may be revealed to you if you specifically request, in written form, such information so that you may schedule meaningful discussions with other PRP's regarding cleanup efforts and quickly organize yourselves into a single representative body to facilitate negotiations with the Agency. The identities of the other PRP's will be released with the understanding that the information provided does not constitute public disclosure under the Freedom of Information Act.

In addition, EPA is seeking to obtain certain information from you. Under the provisions of Section 104 of CERCLA, 42 U.S.C. §9604, and Section 3007 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §6927, as amended by the Solid Waste Disposal Act Amendments of 1980, the Administrator of the Environmental Protection Agency has the authority to require any person who generates, stores, treats, transports, disposes of, or otherwise handles or has handled hazardous wastes and substances to furnish information related to such wastes and substances. Pursuant to these statutory provisions, you are hereby requested to provide the following information:

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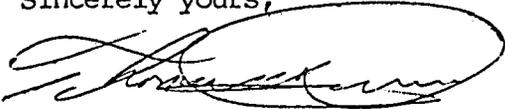
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Due to the seriousness of the problem at this site and the attendant legal ramifications, the Agency strongly encourages you to submit a written response within the time frame specified herein.

Sincerely yours,



Thomas W. Devine, Director  
Waste Management Division

cc: William Meyer  
NC Solid and Hazardous Waste

Vance Hughes  
Senior Consultant, Negotiations  
Clean Sites Inc.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET  
ATLANTA, GEORGIA 30365

4WD-ER

AUG 12 1985

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED



Christian Schmidt Brewing Company  
127 Edwards Street  
Philadelphia, PA 19123

Re: SED, Inc. Site  
6219 Swing Court and 500-E Radar Rd.  
Greensboro, NC

Dear Sir:

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U. S. Environmental Protection Agency  
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Atlanta, GA 30365

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In addition, EPA is seeking to obtain certain information from you. Under the provisions of Section 104 of CERCLA, 42 U.S.C. §9604, and Section 3007 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §6927, as amended by the Solid Waste Disposal Act Amendments of 1980, the Administrator of the Environmental Protection Agency has the authority to require any person who generates, stores, treats, transports, disposes of, or otherwise handles or has handled hazardous wastes and substances to furnish information related to such wastes and substances. Pursuant to these statutory provisions, you are hereby requested to provide the following information:

1. A description of the material that your company had stored, disposed of, or processed at the site.
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In addition to the above information, if you are privately insured against releases of hazardous wastes and substances as a result of the handling of such materials, please inform us of the existence of such insurance and provide us with copies of all insurance policies in effect during the period of activity in question.

Your answers to these questions must be sent to EPA (at the above address) within ten (10) calendar days of your receipt of this letter. In addition, under Section 3008 of RCRA, 42 U.S.C. §6928, failure to comply with this request may result in an order requiring compliance or a civil action for appropriate relief. Section 3008 also provides for civil penalties. Failure to comply with this request under Section 104 of CERCLA may result in a civil enforcement action being brought against you by EPA.

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Sincerely yours,



Thomas W. Devine, Director  
Waste Management Division

cc: William Meyer  
NC Solid and Hazardous Waste

Vance Hughes  
Senior Consultant, Negotiations  
Clean Sites Inc.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET  
ATLANTA, GEORGIA 30365

4WD-ER

AUG 12 1985

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED



Eastern High Voltage  
17A Marlen Drive  
Robbinsville, NJ 08691

Re: SFD, Inc. Site  
6219 Swing Court and 500-E Radar Rd.  
Greensboro, NC

Dear Sir:

The United States Environmental Protection Agency (EPA) is considering spending public funds to investigate and take corrective action for the control of releases and threatened releases of hazardous substances at the above-referenced site. This action is being taken pursuant to Section 104 and other provisions of the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.C. §9601 *et seq.* (CERCLA). This site consists of two separate facilities; the Radar Road facility is an abandoned warehouse that was used for the storage of polychlorinated biphenyls (PCB's) and PCB contaminated material, and the Swing Court facility is an abandoned warehouse used for the storage and processing of PCB's.

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EPA has reason to believe that you may be a responsible party. More specifically, the Agency has reason to believe that you are a generator of the waste present on-site.

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This letter is also to notify you that EPA is currently planning to conduct the following activities at the SED, Inc. Site:

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Mr. Shane Hitchcock  
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U. S. Environmental Protection Agency  
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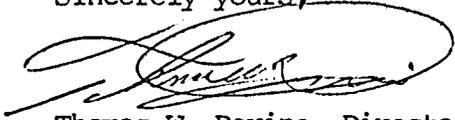
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Waste Management Division

cc: William Meyer  
NC Solid and Hazardous Waste

Vance Hughes  
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Clean Sites Inc.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV  
345 COURTLAND STREET  
ATLANTA, GEORGIA 30365

AUG 12 1985



4WD-ER

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

MET Electrical, 1  
916 West Patapsco Avenue  
Baltimore, MD 21230

Re: SED, Inc. Site  
6219 Swing Court and 500-E Radar Rd.  
Greensboro, NC

Dear Sir:

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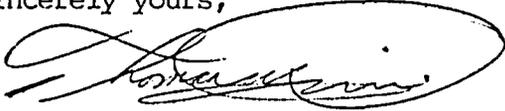
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Sincerely yours,

A handwritten signature in cursive script, enclosed in a hand-drawn oval. The signature appears to read "Thomas W. Devine".

Thomas W. Devine, Director  
Waste Management Division

cc: William Meyer  
NC Solid and Hazardous Waste

Vance Hughes  
Senior Consultant, Negotiations  
Clean Sites Inc.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV  
345 COURTLAND STREET  
ATLANTA, GEORGIA 30365



4WD-ER

AUG 12 1985

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Otis Elevator - United Technologies  
350 East High Street  
London, OH 43140

Re: SED, Inc. Site  
6219 Swing Court and 500-E Radar Rd.  
Greensboro, NC

Dear Sir:

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Vance Hughes  
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET  
ATLANTA, GEORGIA 30365

4WD-ER

JUL 30 1985

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED



United States Mint  
Bureau of the Treasury Department  
15th St. & Pennsylvania Ave., NW  
Washington, DC 20020

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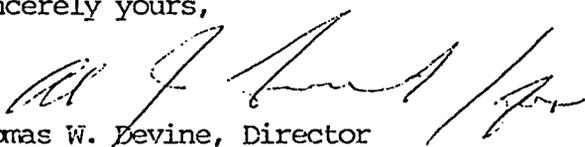
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET  
ATLANTA, GEORGIA 30365

JUL 30 1985

4WD-ER

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Veterans Administration Hospital  
2300 Ramsey Street  
Fayetteville, NC 28301

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Greensboro, NC

Dear Sir:

The United States Environmental Protection Agency (EPA) is considering spending public funds to investigate and take corrective action for the control of releases and threatened releases of hazardous substances at the above-referenced site. This action is being taken pursuant to Section 104 and other provisions of the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.C. §9601 et seq. (CERCLA). This site consists of two separate facilities; the Radar Road facility is an abandoned warehouse that was used for the storage of polychlorinated biphenyls (PCB's) and PCB contaminated material, and the Swing Court facility is an abandoned warehouse used for the storage and processing of PCB's.

Responsible parties under CERCLA include the current and former owners or operators and persons who generated hazardous substances or were involved in the transport, treatment, or disposal of them at the site. Under Section 107(a) of CERCLA and other laws, responsible parties may be liable for any costs incurred by the government in taking corrective actions at the site. Such costs may include, but may not be limited to, expenditures for investigation, planning, cleanup of the site, and enforcement. By this letter, therefore, EPA intends to notify you of your potential liability with regard to this matter and to encourage you, as a potentially responsible party, to undertake voluntary cleanup activities.

EPA has reason to believe that you may be a responsible party. More specifically, the Agency has reason to believe that you are a generator of the waste present on-site.

EPA has determined that there is a threat of release of hazardous substances at the above-referenced site. Both facilities contain drums of PCB-laden liquid (approximately 60 to 70% PCB), PCB capacitors, transformers and PCB-contaminated materials such as soil, debris, rags, etc. The drums are stacked so high that they are beginning to collapse under the continuous pressure. The PCB materials are stored such that they present a fire hazard. As a result of



such a threatened release, Horsepen Creek, Buffalo Creek and the trailer park next to the Swing Court facility may be adversely affected.

This letter is also to notify you that EPA is currently planning to conduct the following activities at the SED, Inc. Site:

1. Removal of all contaminated materials and the transport and disposal of such materials at an approved hazardous waste facility.
2. Decontamination of both warehouses.

You should notify EPA in writing within five (5) calendar days from the receipt of this letter of your willingness to conduct or participate in the above-mentioned actions. Otherwise, EPA will assume that you decline any involvement, and will proceed with its efforts to have the site cleaned up.

Your letter should indicate the appropriate name, address, and telephone number for further contact with you and include a statement of your desire to perform or participate in the removal actions. Where you are already involved in discussions with state or local authorities, engaged in voluntary action, or involved in a lawsuit regarding this site, you should continue that activity and report the status of those discussions or that action in your letter. Please provide a copy of your letter to any other parties involved in those discussions.

Your letter should be sent to:

Mr. Shane Hitchcock  
Emergency and Remedial Response Branch  
U. S. Environmental Protection Agency  
345 Courtland St., NE  
Atlanta, GA 30365

If you require further information, please contact either Mr. Hitchcock at 404/881-3931 or Mr. Reuben Bussey, Assistant Regional Counsel at 404/881-2641.

EPA would like to encourage good faith negotiations between you and the Agency and between you and the other parties potentially responsible for the SED, Inc. Site. The names of the other potentially responsible parties (PRP's) may be revealed to you if you specifically request, in written form, such information so that you may schedule meaningful discussions with other PRP's regarding cleanup efforts and quickly organize yourselves into a single representative body to facilitate negotiations with the Agency. The identities of the other PRP's will be released with the understanding that the information provided does not constitute public disclosure under the Freedom of Information Act.

In addition, EPA is seeking to obtain certain information from you. Under the provisions of Section 104 of CERCLA, 42 U.S.C. §9604, and Section 3007 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §6927, as amended by the Solid Waste Disposal Act Amendments of 1980, the Administrator of the Environmental Protection Agency has the authority to require any person who generates, stores, treats, transports, disposes of, or otherwise handles or has handled hazardous wastes and substances to furnish information related to

such wastes and substances. Pursuant to these statutory provisions, you are hereby requested to provide the following information:

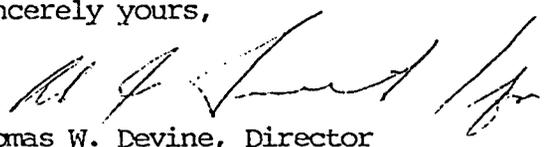
1. A description of the material that your company had stored, disposed of, or processed at the site.
2. For each of such materials, an estimate of the total volume that was transported to the SED, Inc. facilities.
3. Specify which of the two facilities your company utilized.
4. Provide copies of any transactions your company had with the SED, Inc. facility.
5. Identify any party who transported hazardous substances on your behalf to the site.

For the above information, please describe the types of records that you maintained of the disposal activities at, or transportation of hazardous materials to the site including the date of the records, the author of the records, the current location of the records, the current custodian, and all efforts that were taken to identify such records. Pursuant to Section 103 of CERCLA, it is unlawful for any person knowingly to falsify, destroy, mutilate, erase, dispose of, conceal, or otherwise render unavailable or unreadable any records.

The factual and legal discussions contained in this letter are intended solely for notification and edification purposes. They are not intended to, do not, and may not be relied upon as a final Agency position on any matter set forth herein.

Due to the seriousness of the problem at this site and the attendant legal ramifications, the Agency strongly encourages you to submit a written response within the time frame specified herein.

Sincerely yours,



Thomas W. Devine, Director  
Waste Management Division

cc: William Meyer  
NC Solid and Hazardous Waste

# PIEDMONT RESEARCH LABORATORIES

Division Of  
GUILFORD LABORATORIES, INC.

JUNE 25, 1985

Trailers

## REPORT OF ANALYSIS

JOB#: EF50521

CUSTOMER: ECOFLO

SAMPLES: #P1354 - #P1356 (1a - 3a)  
#P1363 - #P1370 (4a - 11a)

## RESULTS

	<u>PCB's (ug/ft<sup>2</sup>)</u>
#P1354 (1a)	1260
#P1355 (2a)	1090
#P1356 (3a)	5100
#P1363 (4a)	2450
#P1364 (5a)	2310
#P1365 (6a)	4870
#P1366 (7a)	600
#P1367 (8a)	1560000
#P1368 (9a)	12100
#P1369 (10a)	88600
#P1370 (11a)	6500

PIEDMONT RESEARCH LABORATORIES  
DIVISION OF GUILFORD LABORATORIES, INC.

*J.A. Rayburn*  
J.A. RAYBURN

# PIEDMONT RESEARCH LABORATORIES

Division Of  
GUILFORD LABORATORIES, INC.

RECEIVED MAY 13 1985

MAY 9, 1985

## REPORT OF ANALYSIS

JOB#: EF50507 A

CUSTOMER: ECOFLO

SAMPLE: WIPES TAKEN AT S.E.D., INC. RADAR ROAD SITE BY STEVE MASON

#P1343 #1 CARPET  
#P1344 #2 DOOR  
#P1345 #3  
#P1346 #4

#P1347 #5  
#P1348 #6  
#P1349 #7 CEILING INSULATION  
#P1350 #8 CEILING INSULATION

## RESULTS

### SAMPLE I.D.

#1  
#2  
#3  
#4  
#5  
#6  
#7  
#8

### PCB'S

PRESENT  
PRESENT (TRACE)  
PRESENT  
PRESENT  
PRESENT (TRACE)  
PRESENT  
PRESENT  
PRESENT

PIEDMONT RESEARCH LABORATORIES  
DIVISION OF GUILFORD LABORATORIES, INC.

*J. A. Rayburn*  
J.A. RAYBURN

# PIEDMONT RESEARCH LABORATORIES

Division Of  
GUILFORD LABORATORIES, INC.

## REPORT OF ANALYSIS

JOB #: EF50507A

CUSTOMER: Ecoflo

SAMPLES: Wipes taken from S.E.D. Radar Rd. site by Steve Mason

#P1343 #1 CARPET  
#P1344 #2 DOOR  
#P1345 #3 FLOOR  
#P1346 #4 FLOOR  
#P1347 #5 WALL  
#P1348 #6 WALL  
#P1349 #7 CEILING INSULATION  
#P1350 #8 CEILING INSULATION

## RESULTS

	<u>PCB'S (micrograms/sq ft)</u>
#P1343	3200000
#P1344	36
#P1345	245
#P1346	2555
#P1347	<1
#P1348	<1
P#1349	20970
#P1350	26600

PIEDMONT RESEARCH LABORATORIES

  
J. A. Rayburn

<u>Sample I.D.</u>	<u>Location</u>	<u>PCB concn</u>	<u>PCB concn</u>
#1	carpet @ entrance to office from warehouse		3200
#2	2 <sup>nd</sup> door into office from warehouse		2357
#3	floor in front of 1 <sup>st</sup> dock door		3645/ft
#4	floor to the right of personnel door in <sup>center</sup> aisle		2454
#5	left wall ~ 5' high		2555
#6	right wall ~ 5' high		4145
#7	plastic from ceiling above 1 <sup>st</sup> loading docks		20970
#8	plastic from ceiling in rear of bldg. above center aisle		454 26600 51

Trailers #

#1a	3462
#2a	2651
#3a	2663
#4a	2897
#5a	4020
#6a	4451
#7a	2695
#8a	1968
#9a	4012
#10a	32765
#11a	4456

BAY

BAY

BAY

(3) Floor

(1) Carpet

(7) ceiling

Front office

Warehouse

Lab Storage Room

Bathroom

(2) Floor

Bathroom

(6) wall

(8) ceiling

(4) Floor

(5) wall

Warehouse



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV  
345 COURTLAND STREET  
ATLANTA, GEORGIA 30365



MAY 06 1985

4WD-ER

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. James B. Caldwell, President  
SED, Inc.  
Box 1306  
Waukesha, Wisconsin 53187

Re: SED, Inc.  
Greensboro, NC

Dear Mr. Caldwell:

The United States Environmental Protection Agency (EPA) is currently investigating the release or potential for release of hazardous substances at the above referenced site. This action is being taken by EPA pursuant to the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA).

However, in order for EPA to fully assess this situation and to determine the potentially responsible parties, all the available information about the site must be reviewed.

Under the provisions of Section 104 of CERCLA, 42 U.S.C. §9604 and Section 3007 of the Resource Conservation and Recovery Act, 42 U.S.C. §6927, as amended by the Solid Waste Disposal Act Amendments of 1980, the Administrator of the EPA has the authority to require any person who generates, stores, treats, transports, disposes of, or otherwise handles or has handled hazardous wastes or substances, to furnish information related to such wastes and substances to EPA.

Pursuant to the above cited statutory authority, EPA hereby requests that you submit the following information pertinent to the above referenced site within ten (10) calendar days from the date of your receipt of this letter.

1. A description of the hazardous substances stored on site.
2. For the above hazardous substances, an estimate of the total volume that was stored at the site.

3. Identify (name and address) any party who (i) stored hazardous substances at the site, (ii) arranged with a transporter for storage of any hazardous substance owned or possessed by such party, or any other party, at the site.
4. Provide any records that you may have of the activities conducted at the site. Include the dates of the records and the author of the records.

Please be advised that Section 103(d)(2) of CERCLA, 42 U.S.C. §9603(d)(2), imposes criminal sanctions for any person who destroys, mutilates, erases, disposes of, conceals, or otherwise renders unavailable or falsifies any such records.

In addition to the above information, if you are privately insured against releases of hazardous wastes and substances as a result of the handling of such materials, please inform us of the existence of such insurance and provide us with copies of all insurance policies in effect during the period of activity in question.

Although all of the information requested herein must be submitted to EPA, you are entitled to assert a business confidentiality claim pursuant to regulations appearing at 40 CFR Part 2, Subpart B, Section 2.203(b). If EPA determines that the information claimed as confidential meets the criteria in 40 CFR Section 2.208, then such information will be disclosed by EPA only to the extent and by means of the procedures specified in 40 CFR Part 2, Subpart B.

Unless a confidentiality claim is asserted at the time the requested information is submitted, EPA may make this information available to the public without further notice to you.

Because of the attendant legal ramifications, EPA urges you to forward your written response within the ten (10) day time span. Your response should be sent to:

Mr. Shane Hitchcock  
Emergency & Remedial Response Branch  
U. S. Environmental Protection Agency  
345 Courtland Street, NE  
Atlanta, GA 30365

If you have any questions or would like to discuss this matter further, please contact Mr. Hitchcock at 404/881-3931 or Ms. Giezelle Bennett of my CERCLA Compliance staff at 404/881-2930.

Thank you for your prompt attention to this matter.

Sincerely yours,

*George L. Harlow*

*fo* Thomas W. Devine, Director  
Waste Management Division

✓ cc: William Myers  
NC Solid & Hazardous Waste

4  
A (please see "a copy for my records")  
G. H. Deakins

To: Bill Meyer, Solid & Hazardous Waste Branch  
Head

From: G. H. Deakins, Waste Management Specialist  
Subject: Investigation of SED Inc., Greensboro

On April 24, 1985, an investigation was made of the SED warehouses located on 6219 Swing Court and 500 Radar Road in Greensboro. The warehouses have been used by SED to store PCB. It came to our attention that the SED company has become insolvent.

Present for the investigation was Shane Hitchcock and Joe Young from EPA. Also present were numerous local officials and attorneys representing the warehouse owners.

Each warehouse is about fifty feet wide and one hundred feet long. Drums of PCB are stacked six high in parts of the buildings along with transformers and capacitors. The Swing Court location seemed to have a smaller amount of waste on hand. There was evidence of a small leak at the Swing Court location. The leak was about three square feet. The drums seem to be in good condition at both locations and are stacked neatly with labels. Both buildings seem to be secure.

Present at the Radar Road site are eight trailer truck loads of PCB parked in the parking lot. There ~~is~~ was no evidence of leakage. The Fire Department has been made aware of the situation in case of a leak to protect storm drains.

Also present at the Radar site in the office are some mixed lab chemicals such as; MEK, sodium metal, magnesium metal, acetone, cobalt nitrate, cadmium nitrate, Tetrahydrofuran, phosphoric acid, toluene, and arsenic trioxide. Some of the solvents are in five gallon cans.

Results and conclusions from the investigation are as follows:

1.) The attorneys representing the building owners are asking Ecoflo of Greensboro to take an inventory of each building and trailers to determine exact numbers of drums, capacitors and transformers. This should take about a week. Ecoflo will also try to find where the material came from if possible. Some containers have the generators name on them.

2.) Once inventory is completed, the attorneys will contact companies which generated PCB to SEP and ask them to reclaim their waste.

3.) The attorney have said that they will notify the FBI and try to seize the financial

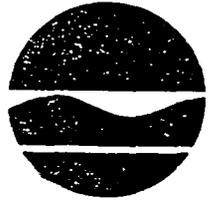
- records from SED. They already have a list of companies that generated to SED.
- 4.) The EPA representatives have stated they will take no action at present and let the attorneys try to work with the situation. If this doesn't work, the superfund will probably be needed.
  - 5.) The attorneys have stated that ~~the~~ SED did have ~~a~~ several insurance policies. One policy has \$5,000,000 / \$10,000,000 ~~environmental~~ environmental protection.
  - 6.) In conclusion, being that our office does not regulate TASCAs waste (PCB), we will concentrate on the mixed lab chemicals at the Radar Rd. site and any other hazardous waste that may be found during the inventory.
  - 7.) Addresses and phone numbers of the contacts for the cleanup.

Attorneys: Swing Court Site  
Stephen Carp  
500 NCRB Building  
P.O. Box 21927  
Greensboro, N.C. 27420  
phone 919-378-1450

Radar Rd. Site  
George House or Bill Ross  
P.O. Drawer 11  
Greensboro, N.C. 27402  
phone 919-373-8850

Enmil

SEP  
FILE



New York State Department of Environmental Conservation  
50 Wolf Road, Albany, New York 12233 -0001

Henry G. Williams  
Commissioner



PCB

NC  
Gentlemen:

In accordance with the New York State Environmental Conservation Law and Part 364 of the rules and regulations, all persons who transport septic or industrial/hazardous wastes in New York State must be permitted by the Department of Environmental Conservation. When our Department receives an application from a person who intends to haul wastes to a facility outside of New York, it is our policy to notify that State or Province before issuing a permit. We therefore request that you take note of the following.

Applicant Bryan Reid Lee, Inc. Date 12-20-84

Address 411 Burton Rd., Lexington, SC 29072

Waste	Destination

See Attachment

If your department has any objections to the above applicant being issued a permit by New York State, or if you have any questions related to the permit application, please notify us within ten (10) days.

Thank you for your cooperation.

Sincerely,

Norman R. Drapeau, P.E.  
Supervisor, Operations Section  
Bureau of Hazardous Waste  
Division of Solid and Hazardous Waste  
(518) 457-3254

NRD:jb

DEC 11 1984

WASTE TRANSPORTER PERMIT APPLICATION—6 NYCRR Part 364  
PART A—Applicant Information

1. APPLICANT BUSINESS NAME B R Y S O N I N D S S E R V S I N C		2. NYSDEC PERMIT NUMBER 5 C - 0 0 1	
3. MAILING ADDRESS STREET 4 1 1 B u r t o n R o a d		CITY L E X I N G T O N	STATE S C
4. LPA ID NUMBER L E X I N G T O N		5. ZIP CODE 2 9 0 7 2	
6. CONTACT PERSON C H A R L E S M K E L L Y		7. PHONE NUMBER 8 0 3 3 5 9 7 0 2 7	
<input type="checkbox"/> New Application <input checked="" type="checkbox"/> Renewal <input checked="" type="checkbox"/> Proof of Insurance Attached			
8. PERMIT FEE ATTACHED		9. Total	
a. Regulatory	b. LPA	c. Other	d. Total
	1 4 0 0 0		1 4 0 0 0

WASTE TRANSPORTER PERMIT APPLICATION—6 NYCRR Part 364  
PART B—Vehicle Information

1. APPLICANT BUSINESS NAME (for Modifications only)		2. NYSDEC PERMIT NUMBER (for Modifications only)	
3. VEHICLE FEE ATTACHED (for modification only)		4. TOTAL NUMBER OF VEHICLES	
a. Regulatory	b. LPA	c. Other	d. Total
5. LOCATION WHERE VEHICLES ARE GARAGED: STREET 4 1 1 B U R T O N R O A D		CITY L E X I N G T O N	STATE S C
6. License Number		7. State	8. Capacity
9. Units		10. Make	11. Type
12. Delete		13. Add	
3 4 7 5 8 2	M E	4 5 0 0 0	0 3
5 6 7 2 4 2	M E	4 5 0 0 0	0 3
3 4 7 5 8 9	M E	4 5 0 0 0	0 3
D 9 1 0 2 5	N C	4 5 0 0 0	0 3
D 9 1 0 2 3	N C	4 5 0 0 0	0 3
B 5 3 4 8 1	M E	4 5 0 0 0	0 3
3 4 4 5 8 6	M E	4 5 0 0 0	0 3
3 3 9 9 5 7	M E	4 5 0 0 0	0 3
T L 3 0 0 7 4	S C	4 5 0 0 0	0 3
T L 3 0 0 7 3	S C	4 5 0 0 0	0 3
3 5 8 2 S T	I L	4 5 0 0 0	0 3
5 0 0 1 8 2	M E	4 5 0 0 0	0 3
0 9 5 2 7 6 2	G A	4 5 0 0 0	0 3
14. I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.			
SIGNATURE <i>Charles M. Kelly</i>		PRINTED OR TYPED NAME Charles M. Kelly	
TITLE Vice President		DATE 11-7-84	

WASTE TRANSPORTER PERMIT APPLICATION—6 NYCRR Part 364

PART A—Applicant Information

1. APPLICANT BUSINESS NAME B R Y S O N I N D S S E R V S I N C						2. NYSDEC PERMIT NUMBER S C — 0 0 1									
3. MAILING ADDRESS STREET 4 1 1 B u r t o n R o a d															
CITY L E X I N G T O N						STATE S C		ZIP CODE 2 9 0 7 2							
COUNTY L E X I N G T O N						4. EPA ID NUMBER S C D 0 0 0 8 2 2 3 1 2									
5. CONTACT PERSON C H A R L E S M K E L L Y						6. PHONE NUMBER 8 0 3 , 3 5 9 7 0 2 7									
7. CHECK <input type="checkbox"/> New Application <input checked="" type="checkbox"/> Renewal <input checked="" type="checkbox"/> Proof of Insurance Attached															
8. PERMIT FEE ATTACHED															
a. Regulatory				b. UPA 1 4 0 0 0				c. Other				d. Total 1 4 0 0 0			

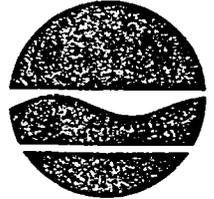
WASTE TRANSPORTER PERMIT APPLICATION—6 NYCRR Part 364

PART B—Vehicle Information

1. APPLICANT BUSINESS NAME (for Modifications only)										2. NYSDEC PERMIT NUMBER (for Modifications only) □□ — □□□□					
3. VEHICLE FEE ATTACHED (for modification only)										4. TOTAL NUMBER OF VEHICLES					
a. Regulatory		b. UPA		c. Other		d. Total									
5. LOCATION WHERE VEHICLES ARE GARAGED:															
STREET 4 1 1 B U R T O N R O A D															
CITY L E X I N G T O N															
STATE S C															
ZIP CODE 2 9 0 7 2															
6. License Number		7. State		8. Capacity		9. Units		10. Make		11. Type		12. Delete		13. Add	
T L 3 2 8 3 1		S C		4 5 0 0 0		0 3		AMER		VAN				✓	
T L 3 2 8 3 0		S C		4 5 0 0 0		0 3		AMER		VAN				✓	
8 8 4 1 2 5		M E		4 5 0 0 0		0 3		DORSEY		VAN				✓	
8 6 0 5 1 1		M E		4 5 0 0 0		0 3		"		VAN				✓	
5 3 2 7 0 2		M A		4 5 0 0 0		0 3		STK		VAN				✓	
T 8 2 7 8 4		T N		4 5 0 0 0		0 3		STK		VAN				✓	
T L 2 3 4 1 7		S C		4 2 0 0		0 1		HEIL		TANK				✓	
T L 2 3 6 0 1		S C		6 0 0 0		0 1		POLAR		TANK				✓	
S 6 1 0 1 5		N C		3 0		0 2		DORSEY		Dump				✓	
S 6 1 0 1 4		N C		3 0		0 2		"		"				✓	
D R 9 0 0 4		G A		8 6 0 0		0 1		FRUH		TANK				✓	
14. I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made hereon are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.															
SIGNATURE <i>Charles M. Kelly</i>								PRINTED OR TYPED NAME Charles M. Kelly							
TITLE Vice President								DATE 11-7-84							



New York State Department of Environmental Conservation  
50 Wolf Road, Albany, New York 12233 -0001



Henry G. Williams  
Commissioner



NC  
Gentlemen:

In accordance with the New York State Environmental Conservation Law and Part 364 of the rules and regulations, all persons who transport septic or industrial/hazardous wastes in New York State must be permitted by the Department of Environmental Conservation. When our Department receives an application from a person who intends to haul wastes to a facility outside of New York, it is our policy to notify that State or Province before issuing a permit. We therefore request that you take note of the following.

Applicant Joncaunda Jack Transport, Inc Date 3-7-84

Address 1140 Military Rd., PO Box H, Buffalo, NY 14217

Waste

Destination

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See Attachment

If your department has any objections to the above applicant being issued a permit by New York State, or if you have any questions related to the permit application, please notify us within ten (10) days.

Thank you for your cooperation.

Sincerely,

Norman R. Drapeau, P.E.  
Supervisor, Operations Section  
Bureau of Hazardous Waste  
Division of Solid and Hazardous Waste  
(518) 457-3254

NRD:jb

NC MAR 5 1984

## WASTE TRANSPORTER PERMIT APPLICATION—6 NYCRR Part 364

## PART A—Applicant Information

1. APPLICANT BUSINESS NAME Tonawanda Tank Transport Service, Inc.		2. NYSDEC PERMIT NUMBER 9A — 080	
3. MAILING ADDRESS STREET 1140 Military Road P. O. Box H			
CITY Buffalo		STATE N Y	ZIP CODE 14217
COUNTY Erie		4. EPA ID NUMBER NYD 097644801	
5. CONTACT PERSON Robert W. Oleszko		6. PHONE NUMBER (716) 873-9703	
7. CHECK <input type="checkbox"/> New Application <input checked="" type="checkbox"/> Renewal <input checked="" type="checkbox"/> Proof of Insurance Attached			
8. PERMIT FEE ATTACHED a. Regulatory      b. UPA      c. Other      d. Total			

## WASTE TRANSPORTER PERMIT APPLICATION—6 NYCRR Part 364

## PART B—Vehicle Information

1. APPLICANT BUSINESS NAME (for Modifications only)		2. NYSDEC PERMIT NUMBER (For Modifications only) 9A — 080	
3. VEHICLE FEE ATTACHED (for modification only) a. Regulatory      b. UPA      c. Other      d. Total		4. TOTAL NUMBER OF VEHICLES	
5. LOCATION WHERE VEHICLES ARE GARAGED: STREET 1140 Military Road			
CITY Buffalo		STATE N Y	ZIP CODE 14217
6. License Number	7. State	8. Capacity	9. Units
S 7 7 7 2 2	N Y	5 0 0 0	0 1
K 6 6 8 3 3	N Y	4 9 0 0	0 1
S 7 7 7 2 3	N Y	5 0 0 0	0 1
K 6 0 7 9 2	N Y	5 5 0 0	0 1
K 5 9 4 0 0	N Y	5 0 0 0	0 1
T 6 2 0 6 6	N Y	5 0 0 0	0 1
U 5 1 5 8 5	N Y	2 5	0 4
U 5 1 5 8 3	N Y	2 5	0 4
S 7 8 4 7 3	N Y	2 5	0 4
S 6 2 7 3 8	N Y	2 5	0 4
S 6 2 7 3 9	N Y	2 5	0 4
S 6 2 7 4 0	N Y	2 5	0 4
U 5 1 7 5 9	N Y	2 5	0 4
10. Make	11. Type	12. Delete	13. Add
Frueh.	Tank		X
Trailm	Tank		X
Arco	Tank		X
Presva	Tank		X
Presva	Tank		X
Presva	Tank		X
Highw	Van		X
Frueh.	Van		X
Freuh.	Van		X
Gindy	Van		X
14. I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.			
SIGNATURE <i>Robert W. Oleszko</i>		PRINTED OR TYPED NAME Robert W. Oleszko	
TITLE Environmental Services Director		DATE March 2, 1984	

MAR 5 1984

**WASTE TRANSPORTER PERMIT APPLICATION—6 NYCRR Part 364**

**PART A—Applicant Information**

1. APPLICANT BUSINESS NAME Tonawanda Tank Transport Service, Inc.				2. NYSDEC PERMIT NUMBER 9 A — 0 8 0			
3. MAILING ADDRESS STREET 1140 Military Road P. O. Box H							
CITY Buffalo				STATE N Y		ZIP CODE 14217	
COUNTY Erie				4. EPA ID NUMBER NYD 097644801			
5. CONTACT PERSON Robert W. Oleszko				6. PHONE NUMBER (716) 873-9703			
7. CHECK <input type="checkbox"/> New Application <input checked="" type="checkbox"/> Renewal <input checked="" type="checkbox"/> Proof of Insurance Attached							
8. PERMIT FEE ATTACHED							
a. Regulatory		b. UPA		c. Other		d. Total	
		2 3 5 . 0 0				2 3 5 . 0 0	

**WASTE TRANSPORTER PERMIT APPLICATION—6 NYCRR Part 364**

**PART B—Vehicle Information**

1. APPLICANT BUSINESS NAME (for Modifications only)						2. NYSDEC PERMIT NUMBER (For Modifications only) 9 A — 0 8 0							
3. VEHICLE FEE ATTACHED (for modification only)						4. TOTAL NUMBER OF VEHICLES							
a. Regulatory		b. UPA		c. Other		d. Total							
		2 3 5 . 0 0				2 3 5 . 0 0				4 3			
5. LOCATION WHERE VEHICLES ARE GARAGED:													
STREET 1140 Military Road													
CITY Buffalo						STATE N Y		ZIP CODE 14217					
6. License Number			7. State		8. Capacity			9. Units		10. Make	11. Type	12. Delete	13. Add
9	4	6 1 1 G C	N	Y				0	4	Ford	S.T.		X
K	6	0 4 7 8	N	Y	5	3	0 0	0	1	Trail	Tank		X
K	9	7 1 8 6	N	Y	5	3	0 0	0	1	Heil	Tank		X
U	5	1 5 8 7	N	Y	6	5	0 0	0	1	Frueh	Tank		X
U	5	1 7 5 2	N	Y	6	4	0 0	0	1	Frueh	Tank		X
U	5	1 5 8 6	N	Y	5	5	0 0	0	1	Butler	Tank		X
U	5	1 7 6 1	N	Y	5	5	0 0	0	1	Cert.	Tank		X
M	5	5 1 2 8	N	Y			2 5	0	4	Benle	Roll		X
P	8	9 5 9 2	N	Y			2 5	0	4	Benle	Roll		X
U	5	1 7 5 7	N	Y			2 5	0	4	Benle	Roll		X
S	7	8 0 3 9	N	Y			2 5	0	4	Benle	Roll		X
U	5	1 7 5 8	N	Y			2 5	0	4	Benle	Roll		X
M	5	5 1 0 2	N	Y			2 5	0	4	Benle	Roll		X
14. I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.													
SIGNATURE <i>Robert W. Oleszko</i>						PRINTED OR TYPED NAME Robert W. Oleszko							
TITLE Environmental Services Director						DATE March 2, 1984							

MAR 5 1984

**WASTE TRANSPORTER PERMIT APPLICATION—6 NYCRR Part 364**

**PART A—Applicant Information**

1. APPLICANT BUSINESS NAME <b>Tonawanda Tank Transport Service, Inc.</b>		2. NYSDEC PERMIT NUMBER <b>9 A — 0 8 0</b>	
3. MAILING ADDRESS STREET <b>1140 Military Road P. O. Box H</b>			
CITY <b>Buffalo</b>		STATE <b>N Y</b>	ZIP CODE <b>14217</b>
COUNTY <b>Erie</b>		4. EPA ID NUMBER <b>NYD 097644801</b>	
5. CONTACT PERSON <b>Robert W. Oleszko</b>		6. PHONE NUMBER <b>(716) 873-9703</b>	
7. CHECK <input type="checkbox"/> New Application <input checked="" type="checkbox"/> Renewal <input checked="" type="checkbox"/> Proof of Insurance Attached			
8. PERMIT FEE ATTACHED a. Regulatory    b. UPA    c. Other    d. Total			

**WASTE TRANSPORTER PERMIT APPLICATION—6 NYCRR Part 364**

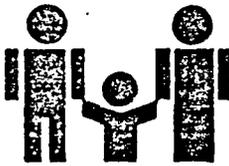
**PART B—Vehicle Information**

1. APPLICANT BUSINESS NAME (for Modifications only)		2. NYSDEC PERMIT NUMBER (For Modifications only) <b>9 A — 0 8 0</b>					
3. VEHICLE FEE ATTACHED (for modification only) a. Regulatory    b. UPA    c. Other    d. Total		4. TOTAL NUMBER OF VEHICLES					
5. LOCATION WHERE VEHICLES ARE GARAGED: STREET <b>1140 Military Road</b>							
CITY <b>Buffalo</b>		STATE <b>N Y</b>	ZIP CODE <b>14217</b>				
6. License Number	7. State	8. Capacity	9. Units	10. Make	11. Type	12. Delete	13. Add
U 5 1 5 8 2	N Y	3 0	0 2	Frueh.	Dump		X
K 6 0 7 8 9	N Y	3 0	0 2	Frueh.	Dump		X
R 5 3 2 9 9	N Y	3 0	0 2	Frueh.	Dump		X
U 5 1 7 5 5	N Y	3 0	0 2	Frueh.	Dump		X
P 9 1 1 0 2	N Y	3 0	0 2	Gilmo	Dump		X
N 7 4 8 4 8	N Y	3 0	0 2	SA/SP	Dump		X
P 9 1 1 0 1	N Y	3 0	0 2	Trailm	Dump		X
N 6 8 2 7 1	N Y	3 0	0 2	Frueh.	Dump		X
P 8 9 5 9 3	N Y	3 0	0 2	Frueh.	Dump		X
K 6 6 7 8 6	N Y	4 0 0 0	0 1	Frueh.	Tank		X
K 6 6 8 6 4	N Y	5 0 0 0	0 1	Pennc	Tank		X
T 6 5 0 7 4	N Y	5 0 0 0	0 1	Frueh.	Tank		X
M 5 4 8 4 7	N Y	2 5	0 4	Trailm	Flat		X
14. I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.							
SIGNATURE <i>Robert W. Oleszko</i>				PRINTED (OR TYPED) NAME <b>Robert W. Oleszko</b>			
TITLE <b>Environmental Services Director</b>				DATE <b>March 2, 1984</b>			









Ronald H. Levine, M.D., M.P.H.  
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES  
P.O. Box 2091  
Raleigh, N.C. 27602-2091

December 6, 1983

Jim Caldwell  
SED Inc  
P O Box 1306  
Waukesha, WI  
EPA NUMBER: NCD980600449

53187

3

Dear Mr. Caldwell:

The United States Environmental Protection Agency has granted the State of North Carolina Interim Authorization for Phase II Components A and B to operate the State's Hazardous Waste Management Program in lieu of the Federal Program under the RCRA.

Section 3007(a) authorizes access to facilities which handle hazardous waste. Access is granted to 'duly designated' officers or employees of the EPA (or State, if that State has a hazardous waste program authorized under section 3006 of the Act.)

Pursuant to section 3006 and N.C.G.S. 130-166.18, an inspection was conducted 11/15/83 by Mr. Joseph H. Deakins, Solid and Hazardous Waste Management Branch. The inspection revealed compliance with the regulations. This office wishes to thank you for your cooperation. Please do not hesitate to contact us if we may be of future assistance.

Sincerely,

O. W. Strickland, Head  
Solid and Hazardous Waste  
Management Branch  
Environmental Health Section

copy: Joseph H. Deakins



*John 12/6/83*

Ronald H. Levine, M.D., M.P.H.  
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES  
P.O. Box 2091  
Raleigh, N.C. 27602-2091

ENTERED  
DEC 6 1983  
DATA PROCESSING

RECEIVED  
NOV 21 1983  
SOLID & HAZARDOUS WASTE MANAGEMENT

Date: 11-15-83

MEMORANDUM

TO: O. W. Strickland, Head  
Solid & Hazardous Waste Management Branch

FROM: J. H. Deakin  
Waste Mgt. Specialist

NAME: SED, Inc.  
6219 Swing Court (City) Greensboro 27409

EPA ID No.: NCD 980712 038  
Contact: Jim Caldwell

A RCRA ( ) Generator, ( Transporter, ~~( )~~ Interim Status, ( ) Final Status,  
compliance inspection was conducted on 11-15-83. The in-  
mo/day/yr

spection can be classified as a ( annual inspection (Gen, Trans.),  
( ) semi-annual inspection (TSD), ( ) follow-up inspection, ( ) other,  
specify \_\_\_\_\_

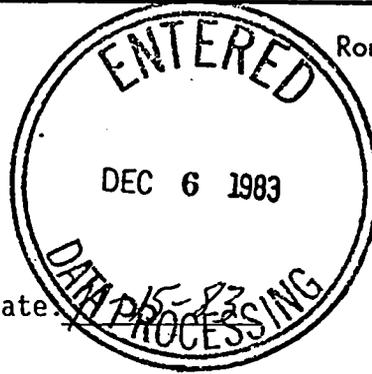
The above subject company was found ( in full compliance ( ) in violation  
( ) all previous violations existing ( ) previous violations existing along  
with additional ones. (Note: You should complete a check sheet to signify  
the additional violations).

DHS Form 3010 (Rev. 10-83)  
Solid & Hazardous Waste





DIVISION OF HEALTH SERVICES  
 P.O. Box 2091  
 Raleigh, N.C. 27602-2091



*Nov 21/6/83*

Ronald H. Levine, M.D., M.P.H.  
 STATE HEALTH DIRECTOR



Date: *11-15-83*

MEMORANDUM

TO: O. W. Strickland, Head  
 Solid & Hazardous Waste Management Branch

FROM: *J. H. Deakins*  
*Waste Mgt. Spec.*

2

NAME: *SED, Inc.*  
*500 Radar Rd. (City) Greensboro 27409*

EPA ID No.: *NC D 980600449*  
*Contact: Jim Caldwell*

A RCRA ( ) Generator, () Transporter, (~~Interim~~) Interim Status, ( ) Final Status,  
 compliance inspection was conducted on *11-15-83*. The in-  
 mo/day/yr

spection can be classified as a () annual inspection (Gen, Trans.),  
 ( ) semi-annual inspection (TSD), ( ) follow-up inspection, ( ) other,  
 specify \_\_\_\_\_

The above subject company was found () in full compliance ( ) in violation  
 ( ) all previous violations existing ( ) previous violations existing along  
 with additional ones. (Note: You should complete a check sheet to signify  
 the additional violations).

DHS Form 3010 (Rev. 10-83)  
 Solid & Hazardous Waste





RDH

RECEIVED  
11-13-86  
NOV 12 1986  
DATA PROCESSING  
ENTERED

NORTH CAROLINA DEPARTMENT OF HUMAN RESOURCES  
SOLID AND HAZARDOUS WASTE MANAGEMENT BRANCH  
P.O. BOX 2091 RALEIGH, NORTH CAROLINA 27602-2091

3

306 N. WILMINGTON ST.  
INSPECTION REPORT

EPA ID.# : NCD980712038 FACILITY NAME : SED Inc.  
ADDRESS: 6219 Swing Court CITY: Greensboro 27409  
DATE OF INITIAL INSPECTION: 10 30 86 STAFF ID #: 03 DOCKET #:  
RESPONSIBLE AGENCY: (S) = STATE: E = EPA: X = OVERSIGHT:  
B = STATE CONTRACTOR: E = EPA CONTRACTOR:

TYPE OF EVALUATION: 9  
1=CEI 8=WITHDRAWAL CANDIDATE  
2=SAMPLING 9=CLOSED FACILITY  
3=RECORD REVIEW 10=GENERAL (LOIS FOR EPA)  
4=CME 11=CASE DEVELOPMENT  
5=FOLLOW UP 12=CORRECTIVE ACTION  
6=CITIZEN COMPLAINT  
7=PART B. 80=INFORMAL MEETING

ENTERED  
NOV 14 1987

DATE OF INSPECTION: 10 30 86

CLASS	AREA OF EVALUATION							
	GW:	C/CP	FIN:	PART B:	CMPL.SCH:	MA:	OT:	CA:
I							0	
II								

ENTER O, X, or Z IN THE CLASS I ROW.  
MAKE ENTRY IN CLASS II ROW ONLY IF CLASS II VIOLATIONS EXIST.

ENFORCEMENT ACTIONS:										
CLASS	VIOLATION	CODE	DATE ACTION TAKEN		COMPLIANCES DATE		PENALTY		RESPONSIBLE	
			SCHED.	ACTUAL	SCHED.	ACTUAL	ASSESSED	COLLECTED	AGENCY	ID

02=3007 INFO REQUEST 05=FINAL ADMIN. ORDER  
03=NOV WARNING LETTER 10=INFORMAL  
04=ADMIN. COMPLAINT

STATUS OF HANDLER: IN COMPLIANCE WITH SCHEDULE IN ORDER: YES: NO:

DATE STATUS EVALUATED: \_\_\_\_\_  
COMMENTS: transporter generators - closed EPA cleanup at both sites under TOSCA. EPA # being handled by M. Bobb.



Keith

Ronald H. Levine, M.D., M.P.H.  
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES  
P.O. Box 2091  
Raleigh, N.C. 27602-2091

Date: August 3, 1983

Mr. John H. Olmsted  
SED, Inc.  
P.O. Box 1306  
Waukesha, Wisconsin 53187

Re: Facility ID No. NCD980600449

Dear Mr. Olmsted:

Based on information supplied by you we have processed and accepted at the State level your request for the facility identified with the above ID number to receive the indicated change in classification under RCRA:

<u>Add As</u>	<u>Delete As</u>	
<input type="checkbox"/>	<input type="checkbox"/>	generator
<input checked="" type="checkbox"/>	<input type="checkbox"/>	transporter
<input type="checkbox"/>	<input type="checkbox"/>	treater
<input type="checkbox"/>	<input type="checkbox"/>	storer
<input type="checkbox"/>	<input type="checkbox"/>	disposer
<input type="checkbox"/>	<input type="checkbox"/>	small generator

We are advising EPA of the change in your status. Please notify us if there is any further change in your operations which would again affect your status. Your EPA ID NO. is  is not  being cancelled.

Cordially,

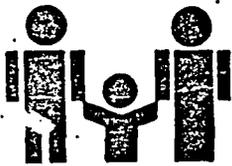
  
O. W. Strickland, Head  
Solid & Hazardous Waste Management Branch  
Environmental Health Section

OWS

cc: Doug McCurry  
EPA Region IV  
Emil Breckling  
Joe Deakins

DHS Form 3048 3/82  
Solid & Haz. Waste Mgt. Branch





*Keith*

Ronald H. Levine, M.D., M.P.H.  
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES  
P.O. Box 2091  
Raleigh, N.C. 27602-2091

Date: August 3, 1983

Mr. John H. Olmsted  
SED, Inc.  
P.O. Box 1306  
Waukesha, Wisconsin 53187

Re: Facility ID No. NCD980712038

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<u>Add As</u>	<u>Delete As</u>	
<input type="checkbox"/>	<input type="checkbox"/>	generator
<input checked="" type="checkbox"/>	<input type="checkbox"/>	transporter
<input type="checkbox"/>	<input type="checkbox"/>	treater
<input type="checkbox"/>	<input type="checkbox"/>	storer
<input type="checkbox"/>	<input type="checkbox"/>	disposer
<input type="checkbox"/>	<input type="checkbox"/>	small generator

We are advising EPA of the change in your status. Please notify us if there is any further change in your operations which would again affect your status. Your EPA ID NO. is  is not  being cancelled.

Cordially,

*O.W. Strickland*  
O. W. Strickland, Head  
Solid & Hazardous Waste Management Branch  
Environmental Health Section

OWS

cc: Doug McCurry  
EPA Region IV  
Emil Breckling  
Joe Deakins

DHS Form 3048 3/82  
Solid & Haz. Waste Mgt. Branch



Ronald H. Levine, M.D., M.P.H.  
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES  
P.O. Box 2091  
Raleigh, N.C. 27602-2091

Date: July 21, 1983

Mr. John H. Olmsted  
SED, Inc.  
P.O. Box 1306  
Waukesha, Wisconsin 53187

Re: Facility ID No. NCD980600449

Dear Mr. Olmsted:

Based on information supplied by you we have processed and accepted at the State level your request for the facility identified with the above ID number to receive the indicated change in classification under RCRA:

<u>Add As</u>	<u>Delete As</u>	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	generator
<input type="checkbox"/>	<input checked="" type="checkbox"/>	transporter
<input type="checkbox"/>	<input checked="" type="checkbox"/>	treater
<input type="checkbox"/>	<input checked="" type="checkbox"/>	storer
<input type="checkbox"/>	<input checked="" type="checkbox"/>	disposer
<input checked="" type="checkbox"/>	<input type="checkbox"/>	small generator

We are advising EPA of the change in your status. Please notify us if there is any further change in your operations which would again affect your status. Your EPA ID NO. is  is not  being cancelled.

Cordially,

O. W. Strickland, Head  
Solid & Hazardous Waste Management Branch  
Environmental Health Section

OWS

This action is taken because this company is concerned only with PCB-containing waste and is not properly a part of the RCRA system.

cc: Doug McCurry  
EPA Region IV  
Emil Breckling  
Joe Deakins  
Marilyn Braun

DHS Form 3048 3/82  
Solid & Haz. Waste Mgt. Branch



Ronald H. Levine, M.D., M.P.H.  
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES  
P.O. Box 2091  
Raleigh, N.C. 27602-2091

Date: July 21, 1983

Mr. John H. Olmsted  
SED, Inc.  
P.O. Box 1306  
Waukesha, Wisconsin 53187

Re: Facility ID No. NCD980712038

Dear Mr. Olmsted:

Based on information supplied by you we have processed and accepted at the State level your request for the facility identified with the above ID number to receive the indicated change in classification under RCRA:

<u>Add As</u>	<u>Delete As</u>	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	generator
<input type="checkbox"/>	<input checked="" type="checkbox"/>	transporter
<input type="checkbox"/>	<input checked="" type="checkbox"/>	treater
<input type="checkbox"/>	<input checked="" type="checkbox"/>	storer
<input type="checkbox"/>	<input checked="" type="checkbox"/>	disposer
<input checked="" type="checkbox"/>	<input type="checkbox"/>	small generator

We are advising EPA of the change in your status. Please notify us if there is any further change in your operations which would again affect your status. Your EPA ID NO. is  is not  being cancelled.

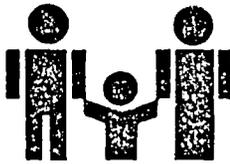
Cordially,

O. W. Strickland, Head  
Solid & Hazardous Waste Management Branch  
Environmental Health Section

OWS

cc: Doug McCurry  
EPA Region IV  
Emil Breckling  
Joe Deakins  
Marilyn Braun  
Nell Keever  
DHS Form 3048 3/82  
Solid & Haz. Waste Mgt. Branch

This action is taken because this company is concerned only with PCB-containing waste and is not properly a part of the RCRA system.



*Keith*

Ronald H. Levine, M.D., M.P.H.  
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES  
P.O. Box 2091  
Raleigh, N.C. 27602-2091

July 21, 1983

Mr. John H. Olmsted  
SED, Inc.  
P.O. Box 1306  
Waukesha, Wisconsin 53187

Dear Mr. Olmsted:

After thorough consideration of SED's operations, our branch has concluded that your need for an EPA ID number can be satisfied by small generator status on our records, and we are therefore sending you forms which indicate this.

Your facilities are not RCRA TSD installations, and must not receive RCRA hazardous waste from others.

As you know, the accumulation limit for small generators is 2,200 lbs. In the normal course of events you should not exceed this. However, if either of your sites ever does, please contact us at once.

We hope this arrangement will be satisfactory to you.

Very truly yours,

*Keith Lawson*

Keith Lawson, Environmental Chemist  
Solid & Hazardous Waste Management Branch  
Environmental Health Section

KL:ct

Enclosures

# SED

INC.

BOX 1306 • WAUKESHA, WISCONSIN 53187  
414-784-3740

July 18, 1983

Mr. John Morelli  
Environmental Engineer  
Bureau of Hazardous Waste Operations  
Division of Solid Waste  
New York State Department of  
Environmental Conservation  
50 Wolf Road  
Albany, NY 12233-0001



Dear Mr. Morelli:

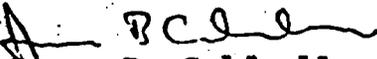
Attached is a copy of our EPA approval issued by the EPA, Region IV, for the destruction of PCB capacitors at our facility in North Carolina. This approval was issued under rules promulgated under the Toxic Substances Control Act. Our facility is inspected and our activities are monitored by the US EPA, Region IV.

The state of North Carolina, under its administration of RCRA, has taken the position that PCBs are exclusively regulated under the Toxic Substances Control Act and are therefore not covered in their administration of RCRA within their state. While they are aware of our operations, have visited our facility, and maintain lines of communication with us, they have no regulatory responsibility for our operations and are referring inquiries to the US EPA, Region IV. Since they do not regulate PCBs, they cannot take a position, either negative or positive, on this type of issue.

I hope that the above will clarify our position for you. If it does not, please give me a call.

Very truly yours,

SED, INC.

  
James B. Caldwell  
President

JBC/slb

cc: O.W. Strickland  
Head Solid and Hazardous  
Waste Management Branch  
Environmental Health Section  
Department of Human Resources  
P.O. 2091  
Raleigh, NC 27602



PCB's  
cc: State Tx  
State of N.C.



PERMIT NUMBER 2-4488  
Date of Issue 05-23-83

**CALIFORNIA EXTREMELY HAZARDOUS WASTE DISPOSAL PERMIT**

California Department of Health Services  
Hazardous Waste Management Branch

CC: Gerry Gavin, EPA/SF

Pursuant to Section 66595, Title 22, Division 4, California Administrative Code, approval is granted to:

Mr. H.M. Howe, Chief Siting Engineer  
PACIFIC GAS & ELECTRIC COMPANY  
77 Beale Street  
San Francisco, CA 94106

Telephone No. 415-781-4211

County San Francisco

Energy Systems Company (ENSCO)  
Old American Oil Road  
P.O. Box 1975  
El Dorado, ARKANSAS 71730

to dispose of the wastes listed below subject to acceptance by:

Tri-State Motor Transit Co. E.L. Murphy Trucking Co.  
P.O. Box 113 P.O. Box 43010  
Joplin, MO 64801 St. Paul, MN 55164

Disposal Site (Name and Address)  
Rollins Environmental Services (TX) Inc.  
P.O. Box 609  
Deer Park, TEXAS, 77536

SED Inc.  
500 East Radar Rd., Greensboro, N.C. 27411  
Alternate Disposal Site (Name and Address)

Registered Hazardous Waste Hauler (Name and Address)

All handlers must be instructed in safety precautions for handling the materials to ensure worker and public safety.

Description of Waste:

(Including Composition with  
Upper and Lower Concentration  
of Hazardous Components)

Waste Component(s)

Upper Lower % ppm

QUANTITY  
On One Time Basis:  
Number: Units:

PCB capacitors (40,000 lbs.  
per disp./2,400,000 lbs per yr.)

pure 500

WASTE  
1

PCB liquid wastes (1400 gal/  
per disp./15,000 gal. per yr.)

pure 500

On Year's Permit:  
Per Disposal (est'd) \_\_\_\_\_  
Per Year (est'd) \_\_\_\_\_

Description of Packaging, Containerization and Transport:  Drums  Cartons  Bottles  Tank Truck

Other 4'x4'x4' plywood boxes designed and

constructed to meet U.S. DOT specifications.

PROPOSED METHOD

OF DISPOSAL

Burial  Ponding  Storage\*\*  Incineration  Other (Specify): 5, 5B and 17c.  
 Treatment (Specify): Chemical processing (SED, Inc.)  
 Recycling (Specify method of reuse): \_\_\_\_\_

Packaging, containerization, and transport of the material shall be in accordance with Title 49, Code of Federal Regulations for hazardous materials, and with regulations of the California Highway Patrol, Title 13, California Administrative Code, for intrastate transport of hazardous materials and, for PCB-containing wastes, in accordance with U.S.E.P.A. regulations set forth in Title 40 CFR Part 761.

Permit to be used on a one time basis \_\_\_\_\_

Permit to be used for a period of one year from date of issue until (expiration date) May 31, 1984

For renewal, send a copy of existing permit with cover letter requesting any additional amendments.

The producer shall be responsible for renewing permit before expiration date and for recording the Extremely Hazardous Waste Permit Number in the lower right corner of the California Liquid Waste Hauler Record accompanying the waste. If there are any questions, please contact:

*Sonia L. Low*  
Authorized Signature

\*\*Storage means holding at an off-site facility for greater than 72 hours. (Section 66192, Title 22, CAC)

**SED**

INC.

BOX 1306 • WAUKESHA, WISCONSIN 53187  
414-784-3740



April 19, 1983

Mr. O. W. Strickland, Head Solid  
and Hazardous Waste Management Branch  
Environmental Health Section  
Department of Human Resources  
P.O. Box 2091  
Raleigh, NC 27602

Re: SED registration and regulation under the State of North  
Carolina Hazardous Waste Management program.

Dear Mr. Strickland:

I greatly appreciate the understanding provided by Mr. Jerry Rhodes of your office in discussing the issues related to SED's registration in this program with me, on April 13. We concur with the position of the state of North Carolina, as we understand it. We believe that it is inappropriate to fabricate a position under which it would appear that SED was regulated by the State of North Carolina if such regulation was to be at our option. That was not, and is not, our intent. However, as I have stated in previous correspondence, it is our corporate position that the interests of all parties are best served by the legitimate regulation and registration of recycling activities such as those conducted by SED. It is unfortunate that there is much confusion elsewhere which adversely impacts our ability to achieve this goal.

For example, Mr. Rhodes pointed out that it is the position of your agency that any materials which might otherwise be considered to be hazardous waste under regulation by the state of North Carolina that also contain PCBs in concentration greater than 50 ppm, are excluded from regulation by the state of North Carolina. We believe that your position is correct and is fully supported by the letter and spirit of 40 CFR 260-265 and 40 CFR 761. At the same time, officials of the US EPA in Washington DC and in several of the regional offices around the country publicly stated that such materials would be subject to dual regulation under both. That leads directly to a requirement that SED be a RCRA facility if we are to conduct business with companies that are regulated from these other offices.

May I assure you that it is not our intent to request that you compromise your position or grant us special license on this matter.

I propose the following:

1. That SED maintain a segregation of solvent-contaminated cleaning solvent (1,1,1,-trichloroethane) which is also PCB contaminated from that which is not. This change in our operating procedure will immediately result in our being able to dispose of more than half of the cleaning waste generated at our Swing Court facility as non-PCB.
2. SED commit itself to the disposal of the petroleum distillates separated from PCBs at its Radar Road facility, rather than continuing our attempt to find a buyer for this relatively small quantity of non-standard material. This will result in our sending several tons of this material to a regulated hazardous waste incinerator.
3. By this letter, SED recognizes, and requests that your records be changed to reflect, that it has not and is not operating either facility as a hazardous waste treatment, storage, disposal facility.
4. SED should, and will, in the immediate future apply to the Regional Administrator of US EPA Region IV for registration as a TSD facility restricted to PCB contaminated material. If your office sees a problem with this particular action, we would greatly appreciate your advise and counsel. This would have the effect of providing an accommodation to other US EPA regions and state regulatory authorities, without incumbering the state of North Carolina with any artificial postures.
5. As a reflection of anticipated changes in the recycling activities of SED in the future, we will move at the earliest date to explore the possibility of applying as a TSD facility operating under North Carolina's hazardous waste management program. This would, following successful approval of such an application, allow us to expand the scope of our separation and recycling activities to include storage and recycling of non-PCB items and materials. We will not commence such activities until after receiving such an approval from your office.

I believe that this multifaceted approach will preserve the positions and integrity of all parties while allowing for a smooth and orderly transition of our scope and regulatory control.

We do request that you instruct your people to include in each explanation of your noninvolvement under the present conditions, whether in response to inquiry or self-initiated disclosure, that

April 19, 1983 - Mr. Strickland - Page 3

we are approved and regulated by the Region IV office under the rules which you and they have agreed upon. Your comments on this approach are earnestly sought and eagerly awaited.

Sincerely,

SED, INC.

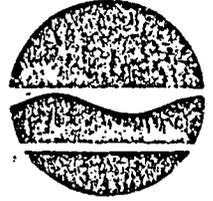


John H. Olmsted  
Vice President - Technical

JHO/slb

cc: Jerry Rhodes - Solid Hazardous Waste Management Branch  
Jacquie MacDonald - Regulations Coordinator

New York State Department of Environmental Conservation  
50 Wolf Road, Albany, New York 12233 -0001



NC  
Gentlemen:

In accordance with the New York State Environmental Conservation Law and Part 364 of the rules and regulations, all persons who transport septic or industrial/hazardous wastes in New York State must be permitted by the Department of Environmental Conservation. When our Department receives an application from a person who intends to transport wastes to a facility outside of New York, it is our policy to notify that State or Province before issuing a permit. We therefore request that you take note of the following.

Applicant A.H. Environment, Inc Date 4-7-83

Address 19 Emerson Plaza East, Emerson, N.J. 07630

Waste	Destination

See Attachment

If your department has any objections to the above applicant being issued a permit by New York State, or if you have any questions related to the permit application, please notify us within ten (10) days.

Thank you for your cooperation.

Sincerely,

Norman R. Drapeau, P.E.  
Supervisor, Operations Section  
Bureau of Hazardous Waste  
Division of Solid Waste  
(518) 457-3254

NRD:jb

APR 5 1983

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

APPLICATION FOR SEPTIC TANK CLEANER AND INDUSTRIAL WASTE COLLECTOR PERMIT

*North Carolina*

submit in TRIPLICATE

1. NAME OF BUSINESS A. H. ENVIRONMENT, INC.		2. LOCATION WHERE VEHICLES ARE GARAGED 19 Emerson Plaza East		3. NO. OF VEHICLES 1
BUSINESS ADDRESS Street 19 Emerson Plaza East, Emerson, New Jersey		City & State	Zip Code 07630	Telephone No. (201) 967-7411
				PERMIT NO. JA-100

VEHICLES	VEHICLE NO.					
	1	2	3	4	5	6
a. MAKE	GMC					
b. YEAR	1981					
c. COLOR	White					
d. LICENSE PLATE NO.	XA22AX					
e. STATE OF REGISTRATION	N.J.					
f. TYPE (Tank, open, etc.)	Van					
g. TANK CAPACITY	--					

NOTE: For additional vehicles and/or information, please attach a supplemental sheet and check here

6. PHYSICAL AND CHEMICAL CHARACTER OF WASTES HANDLED NOTE: If Industrial Wastes are handled, form SW-14 must also be completed.

Solid toxic waste: i.e.: PCB TRANSFORMERS  
 PCB capacitors  
 PCB debris  
 Asbestos

Liquid hazardous & toxic: PCB liquids - all concentrations.

Chemical Wastes: Paint wastes, laboratory reagents, low boiling hydrocarbons.

7. LOCATION AND MANNER OF DISPOSAL

Chemical Waste Management, Emelle, AL.

SED, Inc.'s, Greensboro, North Carolina

8. PLACE OR COMMUNITIES SERVED

any

9. Attach a map or sketch showing the disposal area of receiving station 10. Annual Permit Fee Attached  Yes  No

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

11. SIGNATURE OF APPLICANT 	12. PRINTED OR TYPED NAME Douglas R. Fuhrman	13. DATE 3/25/83
--------------------------------	---	---------------------

STATEMENT OF OWNERS OR OPERATORS OF DISPOSAL AREAS OR RECEIVING STATIONS

Permission is hereby granted to the above named applicant to dump the material stated in this application at site(s) listed below subject to the Rules and Regulations of the Department of Environmental Conservation governing disposal of such material at the designated area.

NAME OF DISPOSAL SITE OR RECEIVING STATION (1) Chemical Waste Management, Emelle, Ala. DATE 35459 (see letter attached)		NAME OF DISPOSAL SITE OR RECEIVING STATION (2) SED, Inc., Greensboro, N.C. 22420 SIGNATURE (see letter attached) DATE	
--	--	---	--

APR 5 1983

# CERTIFICATE OF INSURANCE

This certificate is issued as a matter of information only and confers no rights upon the certificate holder. This certificate does not amend, extend or alter the coverage afforded by the policy(ies) listed below.

Name and Address of Insured:

**A.H. ENVIRONMENT, INC.**  
**19 Emerson Plaza East**  
**Emerson, NJ 07630**

This is to certify that the policy(ies) of insurance listed below have been issued to the insured named above and are in force at this time.

TYPE OF INSURANCE: **Comprehensive General Liability including Products/**  
 and operations/locations **Completed Operations Liability, Independent**  
 covered thereunder **Contractors Liability**

NAME OF INSURER: **Evanston Insurance Company**

POLICY NUMBER: **MC11091**

POLICY PERIOD: **February 16, 1983 to February 16, 1984**

LIMITS OF LIABILITY AND DEDUCTIBLE:

**\$1,000,000 Combined Single Limit Bodily Injury and Property Damage**  
**Liability**

**\$1,000,000 Annual Aggregate**  
**\$ 5,000 Deductible each occurrence**

Should the described policy(ies) be cancelled before its(their) expiration date, the undersigned will endeavor to give 10 days written notice to the certificate holder, but failure to give such notice shall impose no obligation or liability of any kind upon the undersigned or upon the insurer.

Name and Address of Certificate Holder:

\_\_\_\_\_

Date: SM 102-9 6/78



SHAND, MORAHAN & COMPANY, INC.  
One American Plaza, Evanston, Illinois 60201

*W. D. Beaman*

APR 5 1983



**Chemical Waste Management, inc.**  
Southeast Area Sales Office  
2110 Newmarket Parkway, Suite 111  
Marietta, Georgia 30067  
404/952-0444

March 4, 1983

Mr. Doug Fhurman  
A.H. Environment  
19 Emerson Plaza  
Emerson, New Jersey 07630

Dear Mr. Fhurman:

This letter will certify that Chemical Waste Management, Inc. will accept for disposal, PCB and/or approved hazardous waste materials submitted by A.H. Environment of Emerson, New Jersey.

If you should have any questions, please do not hesitate to call me.

Very truly yours,

CHEMICAL WASTE MANAGEMENT, INC.

A handwritten signature in cursive script that reads "James E. Campbell".

James E. Campbell  
Product Line Specialist

JEC/dch

2-3-1983



PCBs

cc: State of Arkansas  
State of North Carolina ✓

MIT NUMBER

2-170

Date of Issue

01 24 83

### CALIFORNIA EXTREMELY HAZARDOUS WASTE DISPOSAL PERMIT

California Department of Health Services  
Hazardous Waste Management Branch

cc: Gerry Gevin, EPA/EF

Pursuant to Section 66595, Title 22, Division 4, California Administrative Code, approval is granted to:

Pacific Gas & Electric Company  
ATTN: Harry M. Howe, Chief, Siting Eng.  
77 Beale Street  
San Francisco, CA 94107

Telephone No. 413 781-4211

County San Francisco

Pick Up Address: 1100 Decoto Road  
Union City, CA

ENSCO  
American Road  
El Dorado, ARKANSAS 71730

to dispose of the wastes listed below subject to acceptance by:

Tri-State Motor Transit Company  
P.O. Box 113  
Joplin, MISSOURI

OR: and

Disposal Site (Name and Address)

SED Inc.  
500 East Redar Road  
Greensboro, N.C. 27410

E.L. Murphy Trucking Company, P.O. Box 43010,  
St. Paul, Minn 55164  
Registered Hazardous Waste Hauler (Name and Address)

Alternate Disposal Site (Name and Address)

All handlers must be instructed in safety precautions for handling the materials to ensure worker and public safety.

Description of Waste:

(including Composition with  
Upper and Lower Concentration  
of Hazardous Components)

Waste Component(s)

Upper

Lower

%

ppm

QUANTITY  
On One Time Basis:  
Number: Units:

PCB Capacitors

560

ppm

Estimated quantity  
per disposal:  
40,000 lbs.

WASTE  
1

On Year's Permit:  
Per Disposal (est'd) 40,000 lbs.  
Per Year (est'd) 2,400,000 lbs.

Description of Packaging, Containerization and Transport:  Drums  Cartons  Bottles  Tank Truck  
 Other 4'x4'x6' special waste transport containers

#### PROPOSED METHOD

OF DISPOSAL  Burial  Ponding  Storage\*\*  Incineration  Other (Specify):  
 Treatment (Specify):  
 Recycling (Specify method of reuse):

Packaging, containerization, and transport of the material shall be in accordance with Title 49, Code of Federal Regulations for hazardous materials, and with regulations of the California Highway Patrol, Title 13, California Administrative Code, for intrastate transport of hazardous materials and, for PCB-containing wastes, in accordance with U.S.E.P.A. regulations set forth in Title 40 CFR Part 761.

Permit to be used on a one time basis .....   
Permit to be used for a period of one year from date of issue until (expiration date) January 31, 1984   
For renewal, send a copy of existing permit with cover letter requesting any additional amendments.

The producer shall be responsible for renewing permit before expiration date and for recording the Extremely Hazardous Waste Permit Number in the lower right corner of the California Liquid Waste Hauler Record accompanying the waste. If there are any questions, please contact: California Dept. of Health Services  
Hazardous Waste Management Branch  
2151 Berkeley Way, Room 119  
Berkeley, CA 94704  
Authorized Signature





U.S. ENVIRONMENTAL PROTECTION AGENCY  
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a pre-printed label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a pre-printed label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

12-7-82

INSTALLATION'S EPA I.D. NO.
1. NAME OF INSTALLATION
II. INSTALLATION MAILING ADDRESS
III. LOCATION OF INSTALLATION

SED, Inc.  
P.O. Box 1306  
Waukesha, Wisconsin 53187  
PLEASE PLACE LABEL IN THIS SPACE  
  
6219 Swing Court  
Greensboro, North Carolina 27409

FOR OFFICIAL USE ONLY

COMMENTS

Grid for comments with columns 13-16 and 17-22.

INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED (yr., mo., & day)
FWCNDG80712038	A	821103

I. NAME OF INSTALLATION  
S E D , I n c .

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX  
3 P . O . 1 3 0 6

CITY OR TOWN  
4 W a u k e s h a

ST. ZIP CODE  
W I 5 3 1 8 7

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER  
5 6 2 1 9 S w i n g C o u r t

CITY OR TOWN  
6 G r e e n s b o r o

ST. ZIP CODE  
N C 2 7 4 0 9

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)  
2 O l m s t e d J o h n V i c e P r e s i d e n t

PHONE NO. (area code & no.)  
4 1 4 - 7 8 4 - 3 7 4 0

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER  
8 S E D , I n c .

B. TYPE OF OWNERSHIP (enter the appropriate letter into box)  
F - FEDERAL  
M - NON-FEDERAL

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))  
 A. GENERATION  
 B. TRANSPORTATION (complete Item VII)  
 C. TREAT/STORE/DISPOSE  
 D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))  
 A. AIR  
 B. RAIL  
 C. HIGHWAY  
 D. WATER  
 E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

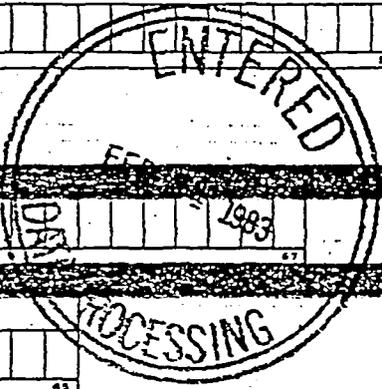
Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

A. FIRST NOTIFICATION  
 B. SUBSEQUENT NOTIFICATION (complete Item C)

C. INSTALLATION'S EPA I.D. NO.

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.



DETACH

**IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)**

**A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES.** Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

**E. HAZARDOUS WASTES FROM SPECIFIC SOURCES.** Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

**C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES.** Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

**D. LISTED INFECTIOUS WASTES.** Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
----	----	----	----	----	----

**E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES:** Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

1. IGNITABLE (D001)    
  2. CORROSIVE (D002)    
  3. REACTIVE (D003)    
  4. TOXIC (D004)

**X. CERTIFICATION**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE <i>John H. Olmsted</i>	NAME & OFFICIAL TITLE (type or print) John H. Olmsted Vice President	DATE SIGNED Oct. 29, 1982
-------------------------------------	--	------------------------------

EPA Form 8700-12 (6-80) REVERSE

**NOTE:** All activities relate to transportation, analysis, and separation of PCB's from contaminated materials (oils, hydraulic fluids, capacitors, etc.).

SOLID WASTE MANAGEMENT  
 NOV 03 1982

DETACH A

DETACH A



OFFICE OF THE SUPERINTENDENT

THE DEPARTMENT OF THE TREASURY

UNITED STATES MINT

PHILADELPHIA, PA. 19106

*Please:  
Send copy to  
Bob Stryker  
EPII - RTP  
wdm*



August 10, 1982

State of North Carolina  
Department of Human Resources  
Division of Health Services  
Environmental Health Section  
Raleigh, North Carolina 27611

Gentlemen:

Attached are documents manifest concerning shipment of PCB capacitors removed from this facility for disposal at Greensboro, North Carolina. Date of removal was August 4, 1982.

Sincerely yours,

*Floyd W. Bassie*

Floyd W. Bassie  
Safety Manager

FWB/AB



Keep Freedom in Your Future With U.S. Savings Bonds

**THIS MEMORANDUM** a copy or duplicate, covering the property named herein, and is intended solely for filing or record.

RECEIVED, subject to the classifications and tariffs in effect on

of the receipt by the carrier of the property described in the Origin

Lading.

FREIGHT BILL NUMBER

511424

SHIPPER'S NUMBER

From *U.S. Mint*

DATE SHIPPED

*8/4/82*

At *Philadelphia PA*

ORIGINATING CARRIER *TRI-STATE*

EXECUTIVE OFFICES  
P.O. BOX 113, JOPLIN, MO. 64801

CONSIGNEE TO (Mail or street address of consignee - For purposes of notification only.)

Subject to Section 7 of conditions of applicable bill of lading, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:  
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

DESTINATION STATE COUNTY

*Greensboro, N.C.*

DELIVERY ADDRESS (To be filled in only when shipper desires and governing tariffs provide for delivery thereat.)

CONNECTING CARRIER(S) DELIVERING CARRIER TRACTOR NO. TRAILER NO.  
*TRI-STATE 2639 440666*

NUMBER PACKAGES	KIND OF PACKAGE, DESCRIPTION OF ARTICLES, SPECIAL MARKS, AND EXCEPTIONS	*WEIGHT (Subject to Correction)	CLASS OR RATE	CK. COL.
<i>13 drums</i>	<i>PCB (contaminated waste) in 13 Paper Drums with 1</i>			

(Signature of consignor.)  
If charges are to be prepaid write or stamp here, "To be Prepaid."

Rec'd \$ \_\_\_\_\_ to apply in prepayment of the charges on the property described hereon.

Agent or Cashier.  
Per \_\_\_\_\_

(The signature here acknowledges only the amount prepaid.)

Charges advanced: \$ \_\_\_\_\_

DIMENSIONS OF CARGO BEFORE LOADED	LENGTH	WIDTH	HEIGHT	TOTAL FEET OF TRAILER SPACE OCCUPIED
	<i>40 FT.</i>	<i>8 FT.</i>	<i>12 FT. 6 IN.</i>	<i>400 FT. IN.</i>

UNLESS A GREATER VALUE IS DECLARED, THE SHIPPER HEREBY RELEASES THE VALUE TO \$5000.00 PER TON OF 2000 POUNDS FOR EACH ARTICLE.

THIS IS TO CERTIFY THAT THE ABOVE NAMED MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED, AND ARE IN PROPER CONDITION FOR TRANSPORTATION, ACCORDING TO THE APPLICABLE REGULATION OF THE DEPARTMENT OF TRANSPORTATION.

UNLESS OTHERWISE NOTED VEHICLE CONTAINS HAZARDOUS MATERIALS PROPERLY PLACARDED IN ACCORDANCE WITH 49CFR172.506.

ARRIVED AT SHIPPER	DATE <i>8/4/82</i>	TIME <i>12:35 P.M.</i>	PREARRANGED SCHEDULE	<input checked="" type="checkbox"/> YES	DATE <i>8/4/82</i>	TIME <i>1:00 P.M.</i>	LOADING STARTED	DATE <i>8/4/82</i>	TIME <i>2:00 P.M.</i>
LOADING COMPLETED	DATE <i>8/4/82</i>	TIME <i>2:55 P.M.</i>	VEHICLE RELEASED	<input type="checkbox"/> NO	DATE <i>8/4/82</i>	TIME <i>3:30 P.M.</i>	SHIPPER'S SIGNATURE <i>[Signature]</i>		
IF THIRD PARTY BILLING, BILL TO:					SHIPPER, PER		AGENT, PER		

SIGNATURE TALLY RECEIPT — Must be filled out and signed at origin and each time the shipment changes custody.

DATE SHIPMENT RECEIVED FROM CONSIGNOR			2ND TIME CARGO CHANGED CUSTODY			4TH TIME CARGO CHANGED CUSTODY		
DATE	TIME	TRACTOR NO.	DATE	TIME	TRACTOR NO.	DATE	TIME	TRACTOR NO.
<i>8/4/82</i>	<i>2:30 P.M.</i>	<i>2639</i>						
DRIVER'S SIGNATURE <i>[Signature]</i>		HOME TERMINAL <i>[Signature]</i>	DRIVER'S SIGNATURE		HOME TERMINAL	DRIVER'S SIGNATURE		HOME TERMINAL
DRIVER'S SIGNATURE <i>[Signature]</i>		HOME TERMINAL <i>[Signature]</i>	DRIVER'S SIGNATURE		HOME TERMINAL	DRIVER'S SIGNATURE		HOME TERMINAL
DRIVER'S SIGNATURE <i>[Signature]</i>		HOME TERMINAL <i>[Signature]</i>	DRIVER'S SIGNATURE		HOME TERMINAL	DRIVER'S SIGNATURE		HOME TERMINAL
1ST TIME CARGO CHANGED CUSTODY			3RD TIME CARGO CHANGED CUSTODY			5TH TIME CARGO CHANGED CUSTODY		
DATE	TIME	TRACTOR NO.	DATE	TIME	TRACTOR NO.	DATE	TIME	TRACTOR NO.
DRIVER'S SIGNATURE		HOME TERMINAL	DRIVER'S SIGNATURE		HOME TERMINAL	DRIVER'S SIGNATURE		HOME TERMINAL
DRIVER'S SIGNATURE		HOME TERMINAL	DRIVER'S SIGNATURE		HOME TERMINAL	DRIVER'S SIGNATURE		HOME TERMINAL

ARRIVED AT CONSIGNEE	DATE	TIME <i>A.M. P.M.</i>	PREARRANGED SCHEDULE	<input type="checkbox"/> YES	DATE	TIME <i>A.M. P.M.</i>	UNLOADING STARTED	DATE	TIME <i>A.M. P.M.</i>
UNLOADING COMPLETE	DATE	TIME <i>A.M. P.M.</i>	VEHICLE RELEASED	<input type="checkbox"/> NO	DATE	TIME <i>A.M. P.M.</i>	CONSIGNEE'S SIGNATURE		
RECEIVED THE ABOVE DESCRIBED PROPERTY IN GOOD CONDITION EXCEPT AS NOTED							X		

ER-SWM-51  
 See cover sheet for instructions  
 Please TYPE or PRINT clearly using  
 a ball point pen—PRESS HARD  
 PART A:

COMMONWEALTH OF PENNSYLVANIA  
 DEPARTMENT OF ENVIRONMENTAL RESOURCES

HAZARDOUS WASTE MANIFEST

DOCUMENT NO. PA A 4762601

GENERATOR NAME A.H.M. F. Bassie U.S. Mint (AHE rep) Fifth & Arch St. Phila, Pa.	SITE ADDRESS	PHONE NO. 215 597-4435	EPA I.D. NO. PA 112013322413
TRANSPORTER NO 1 Tri-State Motor Transit	Joplin, Missouri	800- 641-7580	MO, D, O, 9, 5, 0, 3, 8, 9, 9, 8
TRANSPORTER NO 2 (IF ANY)			
TREATMENT, STORAGE OR DISPOSAL (TSD) FACILITY SED	Waukesha, Wisc.	414 784-3740	NC, D, 9, 8, 0, 6, 0, 0, 4, 4, 9

IF MORE THAN TWO TRANSPORTERS ARE TO BE UTILIZED, FILL OUT THE FOLLOWING AS APPROPRIATE

THIS FORM IS NO. \_\_\_\_\_ OUT OF A TOTAL OF \_\_\_\_\_ THE FIRST MANIFEST DOCUMENT NO IS PA

--	--	--	--	--	--	--	--

PROPER US DOT SHIPPING NAME	US DOT HAZARD CLASS	UN NUMBER	FORM			QUANTITY	UNITS				CONTAINERS NO TYPE	EPA HAZ CODE	EPA WASTE TYPE	
			SOLID	LIQUID	GAS		GALLONS	CU YDS	POUNDS	TONS				
1 PCB-Capacitors Waste Polychlorinated Biphenyls	ORM-E	N/A	X			1950					X	13 55 Gal.		
3														
4														

SPECIAL HANDLING INSTRUCTIONS INCLUDING CONTAINER EXEMPTION (i.e. IDENTIFICATION OF ADDITIONAL WASTES OF A NON-HAZARDOUS NATURE INCLUDED IN SHIPMENT WHICH DO NOT HAVE TO BE MANIFESTED)

GENERATOR'S CERTIFICATION. This is to certify that the above named materials are properly classified, described, packaged, marked and labelled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation, U S EPA, and the State. The wastes described above were consigned to the transporter named. The TSD Facility can and will accept the shipment of hazardous waste, and has a valid permit to do so. I certify that the foregoing is true and correct to the best of my knowledge.

GENERATOR'S SIGNATURE Elizabeth W. Bassie	TITLE SAFETY MANAGER	DATE SHIPPED 8/4/82	EXPECTED ARRIVAL DATE MONTH 8 DAY 5 YEAR 82
DATE RECEIVED MONTH DAY YEAR	TRANSPORTER NO 1 SIGNATURE AND CERTIFICATION OF RECEIPT OF SHIPMENT Frances Ball	TRANSPORTER/ NO. 1 H.W.T. ID (License) No. PA	NUMBER

COPY 1 Disposer State - Mailed By Generator.

TO BE FILLED OUT BY GENERATOR

BY



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET  
ATLANTA, GEORGIA 30365

JUL 29 1982

REF: 4A&VMD

SED Inc.  
500 E. Redox Road  
Greensboro, North Carolina 27405

Gentlemen:

I hereby grant approval to SED, Inc., and its agents, to destroy polychlorinated biphenyl (PCBs) capacitors by using the SED, Inc., system described in application of April 22, 1982. This approval, which is subject to the conditions contained in the enclosure to this letter, is granted pursuant to section 6(e) of the Toxic Substances Control Act (TSCA) and 40 CFR section 761.10(e). The approval is based upon the ability of the wash and distillation system to remove PCBs to a level below detectability on the metal residue or paper residue to be offered into commerce without resulting in the emission of any PCBs into air or water.

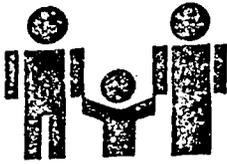
This approval is effective upon receipt of this letter. This approval may be withdrawn, or further conditions may be added to it, at any time EPA has reason to believe that operation of the SED, Inc., system presents an unreasonable risk of injury to health or the environment. Withdrawal of the approval or the imposition of further conditions may also result from future consideration by the Regional Administrator or future EPA rulemaking with respect to PCBs. Moreover, violation of any condition included as part of this approval may subject SED Inc., to enforcement action and/or termination of the approval.

If you have any questions regarding this matter, please contact Ralph Jennings of my staff at: 404/881-3864.

Sincerely yours,

  
Charles R. Jeter  
Regional Administrator

Enclosure



Ronald H. Levine, M.D., M.P.H.  
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES  
P.O. Box 2091  
Raleigh, N.C. 27602-2091

May 18, 1982

Mr. Norman R. Drapeau, P.E.  
Supervisor, Operations Section  
Bureau of Hazardous Waste  
Division of Solid Waste  
New York State Department of  
Environmental Conservation  
50 Wolf Road  
Albany, New York 12233-0001

Dear Mr. Drapeau:

I appreciate your notification of the enclosed activity. Please be advised that SED, Inc. of 500 Radar Road, Greensboro, North Carolina is not an approved facility to receive solid or hazardous waste for storage, treatment or disposal. SED, Inc. does have a State and EPA ID number for transportation of hazardous waste. This agency will inspect SED, Inc. to ensure that no treatment, storage or disposal activity is occurring.

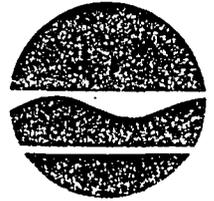
Respectfully,

William L. Meyer, Environmental Engineer  
Solid & Hazardous Waste Management Branch  
Environmental Health Section

WLM:nlc

cc: Mr. Steve Phibbs  
Mr. Julian Foscue

New York State Department of Environmental Conservation  
50 Wolf Road, Albany, New York 12233 -0001



Robert F. Flacke  
Commissioner



NC  
Gentlemen:

In accordance with the New York State Environmental Conservation Law and Part 364 of the rules and regulations, all persons who transport septic or industrial/hazardous wastes in New York State must be permitted by the Department of Environmental Conservation. When our Department receives an application from a person who intends to haul wastes to a facility outside of New York, it is our policy to notify that State or Province before issuing a permit. We therefore request that you take note of the following.

Applicant A. H. Environment, Inc. Date 4-28-82

Address 19 Emerson Plaza E., Emerson, N.J. 07630

Waste

Destination

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---

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See Attachment

If your department has any objections to the above applicant being issued a permit by New York State, or if you have any questions related to the permit application, please notify us within ten (10) days.

Thank you for your cooperation.

Sincerely,

Norman R. Drapeau, P.E.  
Supervisor, Operations Section  
Bureau of Hazardous Waste  
Division of Solid Waste  
(518) 457-3254

NRD:jb

APR 27 1982

APPLICATION FOR SEPTIC TANK CLEANER AND INDUSTRIAL WASTE COLLECTOR PERMIT

No. Carolina

Submit in TRIPLICATE

1. NAME OF BUSINESS A. H. ENVIRONMENT, INC.	2. LOCATION WHERE VEHICLES ARE GARAGED	3. NO. OF VEHICLES
--	--	--------------------

BUSINESS ADDRESS Street 19 Emerson Plaza E.	City & State Emerson, New Jersey	Zip Code 07630	Telephone No. (201) 967-7411	PERMIT NO.
---	-------------------------------------	-------------------	---------------------------------	------------

VEHICLES	VEHICLE NO.					
	1	2	3	4	5	6
a. MAKE						
b. YEAR						
c. COLOR						
d. LICENSE PLATE NO.						
e. STATE OF REGISTRATION						
f. TYPE (Tank, open, etc.)						
g. TANK CAPACITY						

NOTE: For additional vehicles and/or information, please attach a supplemental sheet and check here

PHYSICAL AND CHEMICAL CHARACTER OF WASTES HANDLED NOTE: If Industrial Wastes are handled, form SW-14 must also be completed.

Solid toxic waste: i.e.: PCB transformers  
 PCB capacitors  
 PCB debris  
 Asbestos

Liquid hazardous & toxic: PCB liquids - all concentrations

Chemical wastes: paint wastes, laboratory reagents,  
low boiling hydrocarbons

LOCATION AND MANNER OF DISPOSAL

SED Inc.'s addresses:	3. 925 E. 1st Street Dayton, Ohio 45402
1. 500 Radar Road Greensboro, North Carolina	4. 2323 K Bluemound Road Waukesha, Wisconsin 53186
2. 2336 State Street Route 131 Hillsboro, Ohio 45133	

PLACE OR COMMUNITIES-SERVED

Attach a map or sketch showing the disposal area of receiving station	10. Annual Permit Fee Attached <input type="checkbox"/> Yes <input type="checkbox"/> No
---	---

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

SIGNATURE OF APPLICANT	12. PRINTED OR TYPED NAME	13. DATE
------------------------	---------------------------	----------

STATEMENT OF OWNERS OR OPERATORS OF DISPOSAL AREAS OR RECEIVING STATIONS

Permission is hereby granted to the above named applicant to dump the material stated in this application at site(s) listed below subject to the Rules and Regulations of the Department of Environmental Conservation governing disposal of such material at the designated area.

NAME OF DISPOSAL SITE OR RECEIVING STATION (1)		NAME OF DISPOSAL SITE OR RECEIVING STATION (2)	
NATURE	DATE	SIGNATURE	DATE



Ronald H. Levine, M.D., M.P.H.  
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES  
NORTH CENTRAL REGIONAL OFFICE  
720 Coliseum Drive-Plaza West  
Winston-Salem, N.C. 27106  
(919) 761-2390

April 19, 1982



7

MEMORANDUM

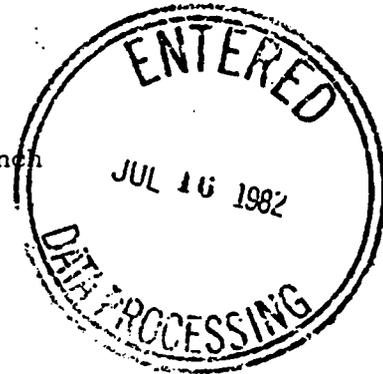
TO: O. W. Strickland, Head  
Solid and Hazardous Waste Management Branch

FROM: Steve Phibbs, District Sanitarian  
North Central Regional Office

SUBJECT: Interim Status Inspection

COMPANY: S.E.D., Inc.  
500 Radar Road (off Friendly Avenue)  
Greensboro, NC  
E.P.A. ID# NCD980600449

CONTACT: Ed Witman



On April 15, 1982, a RCRA interim status inspection was conducted at the S.E.D. plant in Greensboro, NC. S.E.D. reprocess PCB contaminated oil and capacitors. No violations were noted.

SP/mrw

RCRA Inspection Report

1) Facility Description

S.E.D., Inc.  
500 Radar Road  
Greensboro, NC  
E.P.A. ID# NCD980600499  
Guilford County

2) Facility Contact

Ed Witman, Manager

3) Survey Participants

Ed Witman, S.E.D., Inc.  
Robert Shiflet, Guilford County Health Department  
Steve Phibbs, District Sanitarian, Division of Health Services

4) Date of Inspection

April 15, 1982

5) Applicable Regulations

Toxic Substances Control Act

6) Scope of Survey

RCRA interim status inspection was conducted by the N. C. Solid and Hazardous Waste Management Branch. The scope of the survey covered record review and site survey.

7) Facility Description

S.E.D., Inc. is a PCB reprocessing company. They receive wastes oils and capacitors which are drained and run through a distillation operation. The PCB's are distilled off and will be taken to an E.P.A. approved incinerator for disposal. The other materials, solvents and byproducts will either be reclaimed or disposed of at an approved site.

Since PCB's are covered under the Toxic Substance Control Act, our office really has no regulations to apply to this facility at this point. The company listed as a generator solely to obtain an identification number for business purposes.

We should retain S.E.D.'s listing as a small quantity generator in case E.P.A. should adopt any new regulations concerning PCB's.

INSPECTION FOR INTERIM STATUS STANDARDS  
 OWNER/OPERATOR OF HAZARDOUS WASTE MANAGEMENT FACILITIES

Name of Site: S.E.D. Inc. EPA I.D.: NC198060049 County: Gulford  
 Location: 500 Radar Rd, Greensboro Signature of Facility Contact: Arvin B. Witman  
 Date: 9/15/82 Signature of Inspector(s): Steve Phillips Robert K. Kelly

INSTRUCTIONS: Place a check to indicate Compliance (C), NonCompliance (NC) or Not Applicable (NA). Cite specific violation by Section No.

	<u>C</u>	<u>NC</u>	<u>NA</u>	<u>Violation(s)</u>
1. GENERAL	—	—	✓	—
2. GENERAL FACILITY STANDARDS	—	—	✓	—
3. PREPAREDNESS AND PREVENTION	—	—	✓	—
4. CONTINGENCY PLAN AND EMERGENCY PROCEDURES	—	—	✓	—
5. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING	—	—	✓	—
6. GROUND-WATER MONITORING	—	—	✓	—
7. CLOSURE AND POST-CLOSURE	—	—	✓	—
8. FINANCIAL REQUIREMENTS	—	—	✓	—
9. USE AND MANAGEMENT OF CONTAINERS	—	—	✓	—
10. TANKS	—	—	✓	—
11. SURFACE IMPOUNDMENTS	—	—	✓	—
12. WASTE PILES	—	—	✓	—
13. LAND TREATMENT	—	—	✓	—
14. LANDFILLS	—	—	✓	—
15. INCINERATORS	—	—	✓	—
16. THERMAL TREATMENT	—	—	✓	—
17. CHEMICAL, PHYSICAL, AND BIOLOGICAL TREATMENT	—	—	✓	—
18. UNDERGROUND INJECTION	—	—	✓	—

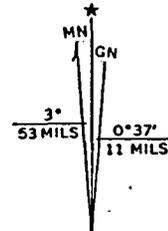
PCB reprocessing company  
Wish to retain facility number.  
 Imminent hazard YES ( ) NO (✓)

**GUILFORD, N. C.**

N3600-W7952.5/7.5

1951

PHOTOREVISED 1968  
AMS 5056 III SW-SERIES V842



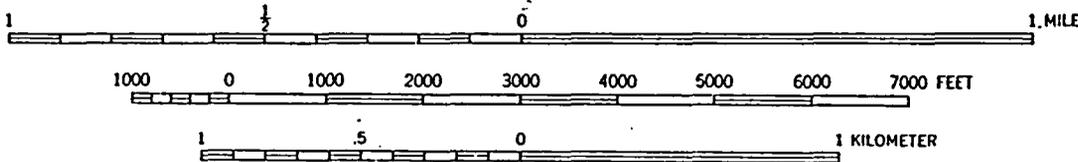
UTM GRID AND 1968 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET

GREENSBORO HIGH POINT  
WINSTON-SALEM  
AIRPORT

**SED, INC.**  
500 RADAR RD  
GREENSBORO NC  
NCD 980 600 449

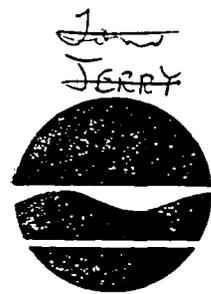
**SED, INC.**  
6219 SWING CT.  
GREENSBORO NC  
NCD 980 712 038

SCALE 1:24000



CONTOUR INTERVAL 10 FEET  
DATUM IS MEAN SEA LEVEL

New York State Department of Environmental Conservation  
50 Wolf Road, Albany, New York 12233 -0001



Henry G. Williams  
Commissioner

SED File



NC  
Gentlemen:

In accordance with the New York State Environmental Conservation Law and Part 364 of the rules and regulations, all persons who transport septic or industrial/hazardous wastes in New York State must be permitted by the Department of Environmental Conservation. When our Department receives an application from a person who intends to haul wastes to a facility outside of New York, it is our policy to notify that State or Province before issuing a permit. We therefore request that you take note of the following.

Applicant Jonawanda Tank Transport Service Date 3-15-85

Address P.O. Box H, 1140 Military Rd., Buffalo, NY

Waste

Destination

14217

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

See Attachment

If your department has any objections to the above applicant being issued a permit by New York State, or if you have any questions related to the permit application, please notify us within ten (10) days.

Thank you for your cooperation.

Sincerely,

Norman R. Drapeau, P.E.  
Supervisor, Operations Section  
Bureau of Hazardous Waste  
Division of Solid and Hazardous Waste  
(518) 457-3254

NRD:jb

NC  
MAR 4 1985

WASTE TRANSPORTER PERMIT APPLICATION—6 NYCRR Part 364

PART A—Applicant Information

1. APPLICANT BUSINESS NAME TONAWANDA TANK TRANSPORT SERVICE, INC.		2. NYSDEC PERMIT NUMBER 9 A — 0 8 0	
1. MAILING ADDRESS STREET P O B O X H 1 1 4 0 M I L I T A R Y R D			
CITY B U F F A L O		STATE N Y	ZIP CODE 1 4 2 1 7
COUNTY E R I E		4. EPA ID NUMBER N Y D 0 9 7 6 4 4 8 0 1	
5. CONTACT PERSON D E N N I S G R E L L		6. PHONE NUMBER 7 1 6 8 7 3 9 7 0 3	
7. CHECK <input type="checkbox"/> New Application <input checked="" type="checkbox"/> Renewal <input type="checkbox"/> Proof of Insurance Attached			
8. PERMIT FEE ATTACHED			
a. Regulatory	b. UPA	c. Other	d. Total

WASTE TRANSPORTER PERMIT APPLICATION—6 NYCRR Part 364

PART B—Vehicle Information

1. APPLICANT BUSINESS NAME (for Modifications only) TONAWANDA TANK TRANSPORT SERVICE, INC.		2. NYSDEC PERMIT NUMBER (For Modifications only) □ □ — □ □ □					
3. VEHICLE FEE ATTACHED (for modification only)		4. TOTAL NUMBER OF VEHICLES					
a. Regulatory	b. UPA	c. Other	d. Total				
5. LOCATION WHERE VEHICLES ARE GARAGED: STREET 1 1 4 0 M I L I T A R Y R O A D							
CITY B U F F A L O		STATE N Y	ZIP CODE 1 4 2 1 7				
6. License Number	7. State	8. Capacity	9. Units	10. Make	11. Type	12. Delete	13. Add
N - 6 8 2 0 1	N Y	3 0	0 2	Frueh	Dump		X
U - 5 1 7 6 0	N Y	3 0	0 2	Frueh	Dump		X
U - 5 1 7 5 4	N Y	3 0	0 2	Frueh	Dump		X
P - 8 9 5 9 3	N Y	3 0	0 2	Frueh	Dump		X
U - 5 1 5 8 1	N Y	3 0	0 2	Trailco	Dump		X
U - 5 1 7 5 3	N Y	3 0	0 2	Frueh	Dump		X
V - 4 4 2 7 7	N Y	3 0	0 2	Gilmo	Dump		X
V - 4 4 2 7 8	N Y	3 0	0 2	Gilmo	Dump		X
K - 6 6 7 8 6	N Y	4 5 0 0	0 1	Frueh	Tank		X
K - 6 6 8 6 4	N Y	5 0 0 0	0 1	Pennco	Tank		X
T - 6 5 0 7 4	N Y	5 0 0 0	0 1	Frueh	Tank		X
14. I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.							
SIGNATURE <i>Dennis J. Grell</i>				PRINTED (OR TYPED) NAME DENNIS J. GRELL			
TITLE TRANSPORTATION SUPERVISOR				DATE FEBRUARY 28, 1985			



WASTE TRANSPORTER PERMIT APPLICATION—6 NYCRR Part 364

MAR 4 1985

PART A—Applicant Information

1. APPLICANT BUSINESS NAME <b>TONAWANDA TANK TRANSPORT SERVICE, INC.</b>		2. NYSDEC PERMIT NUMBER <b>9 A — 0 8 0</b>	
1. MAILING ADDRESS STREET <b>P O B O X H 1 1 4 0 M I L I T A R Y R D</b>			
CITY <b>B U F F A L O</b>		STATE <b>N Y</b>	ZIP CODE <b>1 4 2 1 7</b>
COUNTY <b>E R I E</b>		4. EPA ID NUMBER <b>N Y D 0 9 7 6 4 4 8 0 1</b>	
5. CONTACT PERSON <b>D E N N I S G R E L L</b>		6. PHONE NUMBER <b>7 1 6 8 7 3 9 7 0 3</b>	
7. CHECK <input type="checkbox"/> New Application <input checked="" type="checkbox"/> Renewal <input type="checkbox"/> Proof of Insurance Attached			
8. PERMIT FEE ATTACHED			
a. Regulatory	b. UPA	c. Other	d. Total

WASTE TRANSPORTER PERMIT APPLICATION—6 NYCRR Part 364

PART B—Vehicle Information

1. APPLICANT BUSINESS NAME (for Modifications only) <b>TONAWANDA TANK TRANSPORT SERVICE, INC.</b>		2. NYSDEC PERMIT NUMBER (for Modifications only) <b>□ □ — □ □ □</b>	
3. VEHICLE FEE ATTACHED (for modification only)		4. TOTAL NUMBER OF VEHICLES	
a. Regulatory	b. UPA	c. Other	d. Total
5. LOCATION WHERE VEHICLES ARE GARAGED:			
STREET <b>1 1 4 0 M I L I T A R Y R O A D</b>			
CITY <b>B U F F A L O</b>		STATE <b>N Y</b>	ZIP CODE <b>1 4 2 1 7</b>

6. License Number	7. State	8. Capacity	9. Units	10. Make	11. Type	12. Delete	13. Add
S - 6 2 7 3 8	N Y	2 5	0 4	Gindy	Van		X
S - 6 2 7 3 9	N Y	2 5	0 4	Gindy	Van		X
S - 6 2 7 4 0	N Y	2 5	0 4	Gindy	Van		X
U - 5 1 7 5 9	N Y	2 5	0 4	Gindy	Van		X
U - 5 1 5 8 2	N Y	3 0	0 2	Frueh	Dump		X
K - 6 0 7 8 9	N Y	3 0	0 2	Frueh	Dump		X
R - 5 3 2 9 9	N Y	3 0	0 2	Frueh	Dump		X
U - 5 1 7 5 6	N Y	3 0	0 2	Frueh	Dump		X
U - 5 1 7 5 5	N Y	3 0	0 2	Frueh	Dump		X
P - 9 1 1 0 2	N Y	3 0	0 2	Gilmor	Dump		X
N - 7 4 8 4 8	N Y	3 0	0 2	SA/SP	Dump		X
P - 9 1 1 0 1	N Y	3 0	0 2	Trailm	Dump		X
N - 6 8 2 7 1	N Y	3 0	0 2	Frueh	Dump		X

14. I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

SIGNATURE <i>Dennis J. Grell</i>	PRINTED (OR TYPED) NAME <b>DENNIS J. GRELL</b>
TITLE <b>TRANSPORTATION SUPERVISOR</b>	DATE <b>FEBRUARY 28, 1985</b>

MAR 4 1985

# WASTE TRANSPORTER PERMIT APPLICATION—6 NYCRR Part 364

## PART A—Applicant Information

1. APPLICANT BUSINESS NAME <b>TONAWANDA TANK TRANSPORT SERVICE, INC.</b>		2. NYSDEC PERMIT NUMBER <b>9 A — 0 8 0</b>	
1. MAILING ADDRESS STREET <b>P O B O X H I 1 4 0 M I L I T A R Y R D</b>			
CITY <b>B U F F A L O</b>		STATE <b>N Y</b>	ZIP CODE <b>1 4 2 1 7</b>
COUNTY <b>E R I E</b>		4. EPA ID NUMBER <b>N Y D 0 9 7 6 4 4 8 0 1</b>	
5. CONTACT PERSON <b>D E N N I S G R E L L</b>		6. PHONE NUMBER <b>7 1 6 8 7 3 9 7 0 3</b>	
7. CHECK <input type="checkbox"/> New Application <input checked="" type="checkbox"/> Renewal <input type="checkbox"/> Proof of Insurance Attached			
8. PERMIT FEE ATTACHED			
a. Regulatory	b. UPA	c. Other	d. Total

# WASTE TRANSPORTER PERMIT APPLICATION—6 NYCRR Part 364

## PART B—Vehicle Information

1. APPLICANT BUSINESS NAME (for Modifications only) <b>TONAWANDA TANK TRANSPORT SERVICE, INC.</b>		2. NYSDEC PERMIT NUMBER (For Modifications only) <b>□□ — □□□</b>					
3. VEHICLE FEE ATTACHED (for modification only)		4. TOTAL NUMBER OF VEHICLES					
a. Regulatory	b. UPA	c. Other	d. Total <b>52</b>				
5. LOCATION WHERE VEHICLES ARE GARAGED:							
STREET <b>I 1 4 0 M I L I T A R Y R O A D</b>							
CITY <b>B U F F A L O</b>		STATE <b>N Y</b>	ZIP CODE <b>1 4 2 1 7</b>				
6. License Number	7. State	8. Capacity	9. Units	10. Make	11. Type	12. Delete	13. Add
M - 5 5 1 2 8	N Y	2 5	0 4	Benlee	Roll-off		X
P - 8 9 5 9 2	N Y	2 5	0 4	Benlee	Roll-off		X
U - 5 1 7 5 7	N Y	2 5	0 4	Benlee	Roll-off		X
S - 7 7 7 2 3	N Y	5 0 0 0	0 1	Arco	R/L		X
K - 6 0 7 9 2	N Y	5 5 0 0	0 1	PresVa	Vac		X
K - 5 9 4 0 0	N Y	5 0 0 0	0 1	Presva	Vac		X
T - 6 2 0 6 6	N Y	5 0 0 0	0 1	Presva	Vac		X
T - 7 9 2 3 1	N Y	5 5 0 0	0 1	Presva	Vac		X
U - 5 1 6 3 8	N Y	5 0 0 0	0 1	Presva	Vac		X
V - 4 4 2 9 4	N Y	5 0 0 0	0 1	Presva	Vac		X
U - 5 1 5 8 5	N Y	2 5	0 4	Highwa	Van		X
U - 5 1 5 8 3	N Y	2 5	0 4	Frueh	Van		X
S - 7 8 4 7 3	N Y	2 5	0 4	Frueh	Van		X
14. I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.							
SIGNATURE <i>Dennis J. Grell</i>				PRINTED (OR TYPED) NAME <b>DENNIS J. GRELL</b>			
TITLE <b>TRANSPORTATION SUPERVISOR</b>				DATE <b>FEBRUARY 28, 1985</b>			

MAR 4 1985

WASTE TRANSPORTER PERMIT APPLICATION—6 NYCRR Part 364

PART A—Applicant Information

1. APPLICANT BUSINESS NAME <b>TONAWANDA TANK TRANSPORT SERVICE, INC.</b>		2. NYSDEC PERMIT NUMBER <b>9A — 080</b>	
1. MAILING ADDRESS STREET <b>P O B O X H 1 1 4 0 M I L I T A R Y R D</b>			
CITY <b>B U F F A L O</b>		STATE <b>NY</b>	ZIP CODE <b>1 4 2 1 7</b>
COUNTY <b>ERIE</b>		4. EPA ID NUMBER <b>NY D 0 9 7 6 4 4 8 0 1</b>	
5. CONTACT PERSON <b>D E N N I S G R E L L</b>		6. PHONE NUMBER <b>7 1 6 8 7 3 9 7 0 3</b>	
7. CHECK <input type="checkbox"/> New Application <input checked="" type="checkbox"/> Renewal <input type="checkbox"/> Proof of Insurance Attached			
8. PERMIT FEE ATTACHED			
a. Regulatory	b. UPA	c. Other	d. Total

WASTE TRANSPORTER PERMIT APPLICATION—6 NYCRR Part 364

PART B—Vehicle Information

1. APPLICANT BUSINESS NAME (for Modifications only) <b>TONAWANDA TANK TRANSPORT SERVICE, INC.</b>		2. NYSDEC PERMIT NUMBER (For Modifications only) <b>□□ — □□□</b>					
3. VEHICLE FEE ATTACHED (for modification only)		4. TOTAL NUMBER OF VEHICLES					
a. Regulatory	b. UPA	c. Other	d. Total				
5. LOCATION WHERE VEHICLES ARE GARAGED:							
STREET <b>I 1 4 0 M I L I T A R Y R O A D</b>							
CITY <b>B U F F A L O</b>		STATE <b>NY</b>	ZIP CODE <b>1 4 2 1 7</b>				
6. License Number		7. State	8. Capacity				
9. Units		10. Make	11. Type				
12. Delete	13. Add						
<b>T - 7 8 0 7 5</b>	<b>NY</b>	<b>3 0</b>	<b>0 2</b>	<b>City</b>	<b>Dump</b>		<b>X</b>
<b>9 4 6 1 1 G C</b>	<b>NY</b>	<b>1 6</b>	<b>0 4</b>	<b>Ford</b>	<b>St.Tk.</b>		<b>X</b>
<b>K - 6 0 4 7 8</b>	<b>NY</b>	<b>5 3 0 0</b>	<b>0 1</b>	<b>Trailm</b>	<b>Tank</b>		<b>X</b>
<b>U - 5 1 5 8 7</b>	<b>NY</b>	<b>6 5 0 0</b>	<b>0 1</b>	<b>Frueh</b>	<b>Tank</b>		<b>X</b>
<b>U - 5 1 7 5 2</b>	<b>NY</b>	<b>6 4 0 0</b>	<b>0 1</b>	<b>Frueh</b>	<b>Tank</b>		<b>X</b>
<b>U - 5 1 7 6 1</b>	<b>NY</b>	<b>5 5 0 0</b>	<b>0 1</b>	<b>Certif</b>	<b>Tank</b>		<b>X</b>
<b>U - 5 1 8 0 7</b>	<b>NY</b>	<b>5 5 5 0</b>	<b>0 1</b>	<b>Frueh</b>	<b>Tank</b>		<b>X</b>
<b>U - 6 4 5 1 5</b>	<b>NY</b>	<b>5 5 0 0</b>	<b>0 1</b>	<b>Kari</b>	<b>Tank</b>		<b>X</b>
<b>U - 6 4 5 1 6</b>	<b>NY</b>	<b>5 5 0 0</b>	<b>0 1</b>	<b>Kari</b>	<b>Tank</b>		<b>X</b>
<b>U - 5 5 8 3 4</b>	<b>NY</b>	<b>7 0 0 0</b>	<b>0 1</b>	<b>Polar</b>	<b>Tank</b>		<b>X</b>
<b>U - 5 5 8 3 3</b>	<b>NY</b>	<b>7 0 0 0</b>	<b>0 1</b>	<b>Polar</b>	<b>Tank</b>		<b>X</b>
<b>U - 5 5 8 3 5</b>	<b>NY</b>	<b>7 0 0 0</b>	<b>0 1</b>	<b>Polar</b>	<b>Tank</b>		<b>X</b>
<b>U - 5 5 8 3 6</b>	<b>NY</b>	<b>7 0 0 0</b>	<b>0 1</b>	<b>Polar</b>	<b>Tank</b>		<b>X</b>
14. I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.							
SIGNATURE <i>Dennis J. Grell</i>				PRINTED (OR TYPED) NAME <b>DENNIS J. GRELL</b>			
TITLE <b>TRANSPORTATION SUPERVISOR</b>				DATE <b>FEBRUARY 28, 1985</b>			

**WASTE TRANSPORTER PERMIT APPLICATION—6NYCRR Part 364**  
**PART C—Waste Information**

MAR 4 1985

1. APPLICANT BUSINESS NAME <b>Tonawanda Tank Transport Service, Inc.</b>		2. NYSDEC PERMIT NUMBER <b>9A — 080</b>	
3. TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSD) INFORMATION <input type="checkbox"/> Delete <input checked="" type="checkbox"/> Add			
NCD 980712038		N/A	
EPA ID Number		NYSDEC Facility ID Number	
NAME <b>SED, Inc.</b>			
STREET <b>6219 Swing Court</b>			
CITY <b>Greensboro</b>		STATE <b>NC</b>	ZIP CODE <b>27049</b>
CONTACT PERSON <b>James Caldwell</b>		PHONE NUMBER <b>414-784-3740</b>	

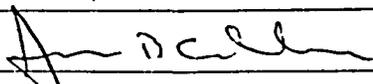
**WASTE INFORMATION**

4. Waste Description	5. Waste Code	6. Form	7. Handling Method	8. Delete	9. Add
PCB Oil	B 0 0 1	0 1	S 0 1		X
PCB contaminated oil <500 ppm	B 0 0 2	0 1	S 0 1		X
PCB contaminated oil >500 ppm	B 0 0 3	0 1	S 0 1		X
PCB contaminated soil	B 0 0 4	0 2	S 0 1		X
PCB solids	B 0 0 5	0 2	S 0 1		X
PCB contaminated clothing, rags and debris	B 0 0 6	0 2	S 0 1		X
PCB capacitors	B 0 0 7	0 2	T 4 7		X
PCB contaminated transformers <500 ppm	B 0 1 0	0 2	T 4 7		X
PCB contaminated transformers >500 ppm	B 0 1 1	0 2	T 4 7		X
SED operates a PCB capacitor processing facility in NC and has approval from the U.S. E.P.A., Region 4 to destroy PCB capacitors and recycle materials which are no longer classified as PCB. The liquid PCB's are sent to an E.P.A. approved incinerator.					

10. COMMENTS

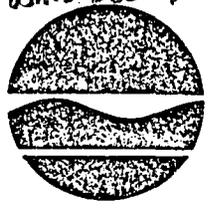
11. STATEMENT OF OWNER OR OPERATOR OF TREATMENT, STORAGE OR DISPOSAL FACILITY

Permission is hereby granted to the above named applicant to deliver waste stated in this application to the T.S.D.F. listed above, subject to the Rules and Regulations of the Department of Environmental Conservation

SIGNATURE 	PRINTED OR TYPED NAME <b>James B. Caldwell</b>
TITLE <b>President</b>	DATE <b>February 21, 1985</b>

with log of discharges as wms (see file.)  
to who does what - wfm

New York State Department of Environmental Conservation  
50 Wolf Road, Albany, New York 12233 -0001



Robert F. Flacke  
Commissioner



NC  
Gentlemen:

In accordance with the New York State Environmental Conservation Law and Part 364 of the rules and regulations, all persons who transport septic or industrial/hazardous wastes in New York State must be permitted by the Department of Environmental Conservation. When our Department receives an application from a person who intends to haul wastes to a facility outside of New York, it is our policy to notify that State or Province before issuing a permit. We therefore request that you take note of the following.

Applicant Tonawanda Tank Transport Service, Inc. Date 3-10-82

Address 1140 Military Road, Buffalo, N.Y. 14217

Waste	Destination
_____	_____
_____	_____
_____	_____
_____	_____

See Attachment

If your department has any objections to the above applicant being issued a permit by New York State, or if you have any questions related to the permit application, please notify us within ten (10) days.

Thank you for your cooperation.

Sincerely,

Norman R. Drapeau, P.E.  
Supervisor, Operations Section  
Bureau of Hazardous Waste  
Division of Solid Waste  
(518) 457-3254

NRD:jb

APPLICATION FOR SEPTIC TANK CLEANER AND INDUSTRIAL WASTE COLLECTOR PERMIT

North Carolina

Submit in TRIPLICATE

1. NAME OF BUSINESS: Tonawanda Tank Transport Service, Inc. 2. LOCATION WHERE VEHICLES ARE GARAGED: 1140 Military Road Buffalo, NY 3. NO. OF VEHICLES: 64

BUSINESS ADDRESS: 1140 Military Road Buffalo New York 14217 Telephone No. 716-873-9703 PERMIT NO. 9A-080

Table with 7 columns (VEHICLES 1-6) and 8 rows (a. MAKE, b. YEAR, c. COLOR, d. LICENSE PLATE NO., e. STATE OF REGISTRATION, f. TYPE, g. TANK CAPACITY). Includes vehicle details like Trailmobile, Fruehauf, Joplin, and capacities like 5300, 6700, 30 Yds.

NOTE: For additional vehicles and/or information, please attach a supplemental sheet and check here [ ]

PHYSICAL AND CHEMICAL CHARACTER OF WASTES HANDLED NOTE: If Industrial Wastes are handled, form SW-14 must also be completed.

Industrial waste only as permitted by the waste disposal companies we contract with per I.C.C. regulations. MC-152173

500-E Radar Rd., Greensboro, NC 27420

LOCATION AND MANNER OF DISPOSAL

See attached.

PCB and PCB-contaminated materials for separation and recycling in accordance with Federal and State regulations.

PLACE OR COMMUNITIES SERVED

New York and all points per our Federal Authority.

Attach a map or sketch showing the disposal area of receiving station

10. Annual Permit Fee Attached [ ] Yes [ ] No

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

SIGNATURE OF APPLICANT [Signature]

12. PRINTED OR TYPED NAME: Leonard J. Lorber

13. DATE: 3/1/82

STATEMENT OF OWNERS OR OPERATORS OF DISPOSAL AREAS OR RECEIVING STATIONS

Permission is hereby granted to the above named applicant to dump the material stated in this application at site(s) listed below subject to the Rules and Regulations of the Department of Environmental Conservation governing disposal of such material at the designated area.

NAME OF DISPOSAL SITE OR RECEIVING STATION (1): SED, Inc.

NAME OF DISPOSAL SITE OR RECEIVING STATION (2):

SIGNATURE: David [Signature] DATE: 2/1/82

SIGNATURE: DATE:



DIVISION OF HEALTH SERVICES  
P.O. Box 2091  
Raleigh, N.C. 27602-2091

March 2, 1982

MEMORANDUM

TO: James F. Stamey, Chief  
Environmental Health Section

FROM: Wm. Larry Elmore *WLE*  
Environmental Engineer  
Water Supply Branch  
Environmental Health Section

Thomas C. Karnoski *JCK*  
Environmental Engineer  
Solid & Hazardous Waste Management Branch  
Environmental Health Section

SUBJECT: Meeting with SED, Incorporated  
Greensboro, North Carolina

On February 17, 1982, the following individuals met at SED, Incorporated:

Wm. Larry Elmore	Department of Human Resources
Thomas C. Karnoski	Department of Human Resources
Stephen Phibbs	Department of Human Resources
Russell Radford	Department of Natural Resources and Community Development
Bob Stryker	Environmental Protection Agency
John H. Olmstead	SED, Incorporated
Edwin G. Witman	SED, Incorporated
Kenneth R. Frank	SED, Incorporated

The purpose of this meeting was to: 1) gain an understanding of the specific nature of SED, Inc. operations from a business and technical standpoint; 2) determine if SED, Inc. activities pose a threat to the environment or public health due to its nature of business and/or location; and 3) what regulatory authority exists among the represented agencies.

SED, Inc. is a polychlorinated biphenol (PCB) full service contractor that either purchases or is paid to handle PCB waste. SED's office, storage, and processing equipment are located in a warehouse at 500 E. Radar Road, Greensboro, North Carolina, 27409. SED has leased approximately 12,000 square feet of warehouse and office space from the Bissell Companies, Incorporated. SED shares this warehouse with other businesses. The businesses are separated by partitions constructed of sheetrock thus affording little protection in the event of a fire.



March 2, 1982

The warehouse in which SED is housed is approximately 500 feet from Horsepen Creek, A-II water which discharges into Lake Brandt, also A-II water. Lake Brandt is one of three lakes utilized by the City of Greensboro as a water supply reservoir.

SED claims that they will not ship, accept shipment, nor store PCB's in bulk, loose drums, or in a large diked area. SED claims that they will receive shipments of PCB waste only if it is packaged in a Safe Askarel Removal and Storage Package (SARAPAC), manufactured exclusively by SED. (See attachments A & B for full description of a SARAPAC.) SED arranges pickup at the site of all PCB materials, utilizing either an SED truck or another licensed hazardous waste hauler.

Some doubt as to the effectiveness of SED's operation and maintenance of its SARAPAC's was raised during the meeting. This is based on the fact that Mr. Olmstead could activate only one of the free liquid alarms in the three (3) SARAPAC's he used to demonstrate the alarm system.

Storage of liquid PCB waste at this facility is indoors in storage bases which contain a maximum of four (4) 55 gallon drums. Each storage base will contain all the liquid in all four drums if they should develop simultaneous leaks. All movement of drums within the facility is in either SARAPAC's or storage bases. Presently, SED has about 10-15,000 gallons of PCB waste stored in the Greensboro warehouse.

Also, SED utilizes a surveillance company to monitor a three circuit electronic security system after work hours. The three circuits are leak detection system, intrusion detection system, and a fire detection system.

Upon receipt, each SARAPAC is opened, the individual drums and their contents weighed, and the drums inspected to assure that they are the proper DOT type. The drums are then placed into storage bases. (No information was given as to company procedures if the drum is not the appropriate DOT type.)

It is the intent of SED, Inc. to utilize atmosphere distillation to separate the carriers (solvents and lighter oils) from the PCB-fluid complex and to sell the carriers as a new product. (See attachment B for process description.) The remaining concentrated PCB waste would be disposed at appropriate facilities outside of North Carolina. Presently, the distillation process is not operational.

SED has adopted the basics of the Resource Conservation and Recovery Act (RCRA) manifest system in addition to meeting the Toxic Substance Control Act (TSCA) PCB record keeping requirements. An annual report is made available to EPA showing each receipt, each transfer, and a summary showing totals for the year, both in and out.

James F. Stamey, Chief

Page 3

March 2, 1982

During this meeting, Mr. Olmstead informed us that for each pound of PCE material stored, SED places \$0.26 in a bank-administered escrow fund. Very little detail was given about the administration and mechanics of this escrow fund nor was any documentation of the fund presented.

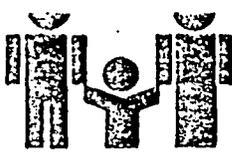
SED, Inc. appears to be a well maintained PCB waste reclamation operation that is temporarily located in a very sensitive area. (According to Mr. Olmstead, SED, Inc. intends to move its operation from its present site due to a lack of space for anticipated expansion.) While the accidental release of small amounts of PCB contaminated substances into Horsepen Creek is a possibility, no large release could occur save for the results of willful intent or an act of God.

Based upon present North Carolina General Statutes, the Environmental Health Section of the Department of Human Resources does not have any regulatory authority pertaining to SED, Inc. However, EPA will be able to regulate SED, Inc. as a PCB storage facility, while the North Carolina Department of Natural Resources and Community Development, Division of Environmental Management will be able to address any type of discharge - be it deliberate or accidental.

WLE:spm

Attachments

cc: Charles E. Rundgren  
✓ O. W. Strickland  
John H. Olmstead



ald H. Levine, M.D., M.P.H.  
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES  
P.O. Box 2091  
Raleigh, N.C. 27602-2091

February 11, 1982

SED, INC.  
PO Box 1306  
Waukesha, WI 53187

RE:  
NCD980600449

Dear Sir:

Attached is a copy of your RCRA Notification Application with the ID Number as assigned by EPA. You should use this ID number on shipping manifests and correspondence.

Cordially,

*O. W. Strickland*

O. W. Strickland, Head  
Environmental Health Section  
Solid & Hazardous Waste Management Branch

EB/yar

Attachment

cc: file

919 454 1682

ED WITMAN



<b>EPA</b>		ENVIRONMENTAL PROTECTION AGENCY	
<b>NOTIFICATION OF HAZARDOUS WASTE ACTIVITY</b>			
INSTALLATION'S EPA I.D. NO.	SED, Inc. 1/27/82 JL		
I. NAME OF INSTALLATION	P.O. Box 1306 000309		
II. INSTALLATION MAILING ADDRESS	WAUKESHA, WI. 53187		
III. LOCATION OF INSTALLATION	500 RADAR RD. GREENSBORO, N.C. 27409		

**INSTRUCTIONS:** If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the **INSTRUCTIONS FOR FILING NOTIFICATION** before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

DETACH

**FOR OFFICIAL USE ONLY**

COMMENTS

C	
C	

INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED (yr., mo., & day)
FNCN980600449 21		8/1/85

**I. NAME OF INSTALLATION**

SED, INC.

**II. INSTALLATION MAILING ADDRESS**

STREET OR P.O. BOX

3 P.O. Box 1306

CITY OR TOWN

WAUKESHA

ST.

WI

ZIP CODE

53187

**III. LOCATION OF INSTALLATION**

STREET OR ROUTE NUMBER

500 RADAR ROAD

CITY OR TOWN

GREENSBORO

ST.

NC

ZIP CODE

27409

**IV. INSTALLATION CONTACT**

NAME AND TITLE (last, first, & job title)

2 OLMSTED, JOHN VICE PRESIDENT

PHONE NO. (area code & no.)

414-784-3740

**V. OWNERSHIP**

**A. NAME OF INSTALLATION'S LEGAL OWNER**

8 SED, INC.

**B. TYPE OF OWNERSHIP** (enter the appropriate letter into box)

F - FEDERAL  
M - NON-FEDERAL

M

**VI. TYPE OF HAZARDOUS WASTE ACTIVITY** (enter "X" in the appropriate box(es))

A. GENERATION  B. TRANSPORTATION (complete Item VII)

C. TREAT/STORE/DISPOSE  D. UNDERGROUND INJECTION

**VII. MODE OF TRANSPORTATION** (transporters only - enter "X" in the appropriate box(es))

A. AIR  B. RAIL  C. HIGHWAY  D. WATER  E. OTHER (specify):

**VIII. FIRST OR SUBSEQUENT NOTIFICATION**

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

A. FIRST NOTIFICATION  B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

**IX. DESCRIPTION OF HAZARDOUS WASTES**

Please go to the reverse of this form and provide the requested information.

W N C D 9 8 0 6 0 0 4 4 5 2 1

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your Installation handles. Use additional sheets if necessary.

Table with 6 columns (1-6) and 2 rows of boxes for waste identification numbers.

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your Installation handles. Use additional sheets if necessary.

Table with 6 columns (13-18, 19-24, 25-30) and 2 rows of boxes for waste identification numbers.

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

Table with 6 columns (31-36, 37-42, 43-48) and 2 rows of boxes for waste identification numbers.

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

Table with 6 columns (49-54) and 2 rows of boxes for waste identification numbers.

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

- 1. IGNITABLE (D001) [ ] 2. CORROSIVE (D002) [ ] 3. REACTIVE (D003) [ ] 4. TOXIC (D000) [X]

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE: John H. Olmsted; NAME & OFFICIAL TITLE: JOHN H. OLMSTED VICE PRESIDENT; DATE SIGNED: Nov. 4, 1981

EPA Form 8700-12 (6-80) REVERSE

NOTE: ALL ACTIVITIES RELATE TO TRANSPORTATION, ANALYSIS, AND SEPARATION OF PCB'S FROM CONTAMINATED MATERIALS (OILS, HYDRAULIC FLUIDS, CAPACITORS, ETC.).

John H. Olmsted

JAN 29 RECD

APR 5 1983

**SED**

INC.  
BOX 1306 • WAUKESHA, WISCONSIN 53187.  
414-784-3740



A.H. ENVIRONMENT, INC.  
19 Emerson Plaza East  
Emerson, NJ 07630

January 27, 1982

Note: A March 1983 letter from  
SED, Inc. will be forwarded  
as soon as received.

Ms Linda Gorman  
Technical Sales  
A. H. Environment, Inc.  
19 Emerson Plaza East  
Emerson NJ 07630

*S. Voorhis*  
AHE

Dear Ms Gorman:

Enclosed is your copy of the signed contract between A. H.  
Environment, Inc. and SED, Inc.

We appreciate your order and are looking forward to doing further  
business with you. Please be assured of our continued  
cooperation.

Sincerely,

SED, Inc.

*Lucille Lawless*

Lucille M. Lawless  
Customer Service

LML/pab

enclosure