

September 7, 2009

Ms. Catherine Young  
On-Scene Coordinator  
U.S. Environmental Protection Agency Region 1  
1 Congress Street  
Boston, Massachusetts 02114

**RE: Final Consolidated Summary Report  
Administrative Order On Consent  
Docket Number 01-2008-0036  
Vermont Mill Properties Site, Bennington, Vermont**

Dear Ms. Young:

This letter report provides a final consolidated summary of the actions taken to comply with the Administrative Settlement Agreement and Order on Consent (AOC) effective March 29, 2008, between the U.S. Environmental Protection Agency (EPA) and Benmont Mill Properties, Inc. and Mace Security International, Inc. (MSI) (collectively, the Respondents). This report provides specific responses to the AOC-required actions as enumerated in Clause 28 of the AOC.

Two detailed summary reports have been submitted previously. The first, entitled *Summary Report – Administrative Order on Consent, Vermont Mill Properties Site, Bennington, Vermont*, was submitted to EPA on October 24, 2008, and detailed completion of the majority of the AOC-required actions. That report is referred to herein as Summary Report #1. The second, entitled *Aboveground Storage Tank Abatement and Removal Summary Report – Administrative Order on Consent, Vermont Mill Properties Site, Bennington, Vermont*, was submitted to EPA on July 24, 2009. It detailed the proper closure and removal of two aboveground storage tanks (ASTs) that were identified for removal by EPA subsequent to the effective date of the AOC. The second report is referred to herein as Summary Report #2.

Both reports were designed to satisfy the requirements of Clause 34 (Final Report) of the AOC. Both reports included a good faith estimate of costs, a listing of quantities and types of materials removed or handled, a discussion of disposal decisions, analytical results, and the required certification statement signed by the appropriate representative of the Respondents. The identities and relationships of all parties participating in the work were identified, and supporting documentation was included in the form of appendices. Where information was not available in time for the submission, that information has been provided herein.

This Final Consolidated Summary Report summarizes the key elements of the prior reports and is intended to satisfy the final conditions of the AOC. Prior reports are referenced extensively herein.

**VT CORPORATE**  
1115 RT 100B, Suite 200  
P.O. Box 750  
Moretown, VT 05660  
**Ph:** (802) 496-4747  
**Fax:** (802) 496-4748

**NH CORPORATE**  
57 Hoit Road  
Concord, NH 03301  
**Ph:** (603) 715-1643  
**Fax:** (603) 715-1647

## **1.0 Background**

On January 8, 2008, the EPA Region 1 Regional Response Center received a call from a concerned local citizen who reported specific activities conducted by the Respondents at the site. The caller stated that site occupants had transferred pallets and drums of material from trailers located behind the mill into a wing of the warehouse, and that the materials may be hazardous.

EPA On-Scene Coordinator (OSC) Catherine Young notified the Vermont Department of Environmental Conservation (VTDEC), which dispatched a responder who confirmed the transfer of the material. Ms. Young performed a site investigation on January 24 and 25, 2008, with representatives from the EPA Resource Conservation and Recovery Act (RCRA) program, the Emergency Planning and Community Right-to-Know program, VTDEC, and Weston Solutions, Inc., an EPA Emergency Planning and Response Branch contractor. Based upon the findings of the investigation, the Respondents and EPA entered into the Settlement Agreement to perform waste removal activities at the site.

Initial waste removal activities were performed from March through August 2008, as described in Summary Report #1. During the course of the 2008 waste removal actions, the OSC noted the presence of two 10,000-gallon ASTs inside an enclosed loading dock ("AST Shed") on the northern side of the building, and required removal or proper closure of the tanks. The tanks had previously stored #6 fuel oil for facility heating, but had been out of service since acquisition of the property by the current owners. This requirement, though not specifically detailed in the AOC, was mandated pursuant to the OSC's authority under the Settlement Agreement. The AST removal activities were performed in May and June 2009, as described in Summary Report #2.

As of the date of this report, all AOC-required waste removal actions at the site have been completed. A final site inspection was performed by representatives of EPA and VTDEC on August 26, 2009.

## **2.0 AOC Work to Be Performed**

Response actions at the facility were grouped as follows for execution as distinct tasks:

- Management and disposal of pyrotechnic materials.
- Characterization and disposal of containers labeled flammable, toxic, reactive, corrosive, or explosive, or that were unlabeled or otherwise of unknown contents.
- Management and disposal of waste ammunition.
- Disposal of 2-chlorobenzalmalononitrile (CS-1 tear gas agent).
- Disposal of oil and oily materials in drums and other containers.
- Disposal of metals-contaminated soil and debris in bulk roll-off containers.
- Cleanup of sandblast grit and metals-contaminated soil that had been stockpiled on the property, including characterization of soil and groundwater in the affected areas.
- Management and disposal of lead-contaminated demolition debris.

In addition to the actions specifically stipulated by the AOC, the Respondents also completed the following tasks in response to OSC direction and EPA requests:

- Abatement, removal, and proper closure of two out-of-service aboveground storage tanks, along with inventory, characterization, and disposal of miscellaneous containers that were discovered during tank removal.
- Decontamination of an area used to manufacture tear gas pellets (Pellet Room), including cleaning and removal of associated ductwork and ventilation systems.
- Preparation and implementation of a Spill Prevention, Control, and Countermeasure (SPCC) Plan covering MSI operations and oil storage areas at the facility.
- Establishment of hazardous waste and hazardous materials storage areas at the site.
- Detailed response to EPA inquiry regarding RCRA and Clean Air Act compliance.

As outlined in Clause 28 (a) through (q) of the AOC, the Respondents performed the following actions to implement the Scope of Work. Each item is referenced by its original number, in sequential order.

*a. Provide to the OSC an inventory of all hazardous waste and materials stored at the Site, including its size, container type, condition, volume contained (if known), detail of any labeling and dates. (If containers were not labeled or dated, indicate "not labeled" or "not dated").*

From March 17 through March 25, 2008, a comprehensive inventory of all chemical containers in the MSI-occupied and leased spaces was compiled. Upon completion, the list was reviewed by facility personnel to segregate the list into the following subsets:

- General Inventory – raw materials used in production, finished product, and maintenance items.
- Laboratory Inventory – small containers of chemicals used in product formulation research.
- Product & Formulation Inventory – finished product packaged for shipment.
- Non-Laboratory Wastes – Empty containers, waste chemicals, items no longer needed.
- Laboratory Wastes – small containers no longer needed in laboratory.
- Non-MSI Wastes – oily wastes and maintenance products left behind by a previous tenant.

During the inventory, all unlabeled containers, containers with partial labels, and waste containers were assigned a unique identification number. All inventoried items were transcribed from field notes onto a spreadsheet. Any additional data that could be discerned from the label or container was also recorded, along with the condition of the container and any other pertinent details.

To account for product inventory (e.g., packaged cases containing individual cans of Mace pepper spray), Wilcox & Barton, Inc. relied upon facility inventory records. A physical hand

count of all products had been completed in December 2007, and computer shipping and sales records were used to bring the quantities up to date.

The completed initial inventory was submitted to EPA via email on March 26, 2008. Following approval of the inventory on April 11, 2008, Wilcox & Barton, Inc. proceeded with preparation of a Work Plan for management, characterization, packaging, and disposal of hazardous wastes at the facility.

During abatement and removal of the 10,000-gallon ASTs, numerous small containers of miscellaneous industrial products were discovered in, on, and around the ASTs. Items were listed on an inventory and documented by photograph. The completed inventory was submitted to EPA on June 9, 2009, and was included as an attachment to Summary Report #2.

*b. Secure the services of a licensed structural engineer to assess the structural integrity of the Cold Storage and the 1924 Building and perform any necessary shoring operations, as recommended and documented in the engineering report, to ensure a safe working environment during removal activities.*

On March 21 and April 14, 2008, DuBois & King, Inc. performed a comprehensive structural evaluation of the MSI-occupied portions of the Mill Complex. The results of the inspections were presented in two documents: 1) *Mill Storage Buildings Second Floor Evaluation* dated April 7, 2008, and 2) *Main Mill Building - EPA Information Request* dated April 24, 2008.

Evaluation of the 2<sup>nd</sup> floors of the Cold Storage and 1924 Buildings indicated that the existing floor framing was not adequate to support the load of the waste drums and bulk CS-1 wooden crates that were present at the time of the evaluation. The report recommended installation of wood posts under support beams and staircases, replacement of unsound and rotten floor decking, installation of plywood over the entire bridge connector, and placement of steel plates along travel pathways for pallets prior to moving wastes. The recommended structural improvements were completed by Benmont Mill Properties, Inc. on April 22, 2008, and approved by EPA prior to commencement of work in those spaces. The structural engineer inspected the improvements and verified proper completion on May 2, 2008.

In addition to the storage buildings, Dubois & King, Inc. also performed a structural evaluation of the Main Mill Building. The study revealed that the then-present uses of the 2<sup>nd</sup>, 4<sup>th</sup>, and 5<sup>th</sup> floors were safely supported by the existing structure; however, the structural capacity of the 2<sup>nd</sup> and 5<sup>th</sup> floors was less than required by the current Vermont Fire and Safety Code and the International Building Code. Therefore, it was recommended that placards be prominently posted stating that the floor load must be limited to 50 pounds per square foot uniform live load.

*c. Establish and maintain a command post at the Site.*

On March 14, 2008, the Incident Command Post was established in an office on the 4<sup>th</sup> floor of the main mill building at the site. The office was equipped with telephone and internet connections, and working space was provided for the EPA On-Scene Coordinator to conduct business.

*d. If necessary, install runoff control measures for containment during removal activities.*

During the removal activities, care was taken to prevent the release of contaminants. Waste containers were secured prior to movement into containment structures and storage areas or loading into trucks for transportation. Methods included securing lids to drums, tightly closing container bungs, and wrapping in plastic sheeting, as necessary. Containers that were in poor condition or otherwise unsuitable for over-the-road transport were over-packed or consolidated into new containers prior to movement. In addition, spill pads and booms were kept on hand in the event of a spill.

For outdoor work that disturbed the ground surface, erosion and sediment controls were established prior to initiation of the work. A hay bale and silt fence barrier was established along the bank of the Walloomsac River where sand blast grit and soil removal were performed.

No releases to the environment (soil, groundwater, surface water, or air) were detected during execution of the work. No spills occurred and there were no human exposure excursions beyond the action levels established for the project.

*e. Delineate the work zones and decontamination area in compliance with Occupational Safety and Health Administration ("OSHA") regulations.*

In support of all work that involved opening containers or other potential chemical exposures, negative pressure containments were constructed by Cyn Environmental Services and designated as Exclusion Zones requiring Level C or better personal protective equipment (PPE) in accordance with the requirements of the Health and Safety Plan (HASP). The containments were constructed of wood framing and polyethylene sheeting and were ventilated using a negative air blower equipped with High Efficiency Particulate Air and organic vapor (carbon) filtration.

Decontamination and Support Zones were established outside each containment or Exclusion Zone. Air and worker exposure monitoring was conducted in all areas in accordance with the HASP, as discussed below. Compliance was monitored by the contractor and by a full-time representative of Wilcox & Barton, Inc. The Certified Industrial Hygienist for the project performed periodic inspections and verified implementation of all required procedures.

*f. Develop a site-specific Health and Safety Plan ("HASP"), in accordance with OSHA regulations 29 CFR Parts 1910, 1926 and 1904, that addresses all stages of removal activities.*

Cashins & Associates prepared a comprehensive HASP that covered all of the planned activities for the removal action. The HASP encompassed all of the general requirements of 29 CFR §1910 (Occupational Safety and Health) and §1926 (Construction). A draft HASP was submitted to EPA on April 2, 2008.

EPA approved the lead-contaminated soil and debris-related portions of the HASP on April 4, 2008. Following incorporation of EPA comments concerning the hazardous waste portions of the plan, the revised HASP was submitted on April 23, 2008 and approved via email on April 25, 2008.

The approved HASP was also implemented for the abatement, cleaning, and removal of two 10,000-gallon ASTs. During all phases of the work, the HASP was supplemented by contractor-specific corporate safety policies and standardized work procedures.

There were no occupational injuries, illnesses, incidents, or accidents requiring reporting under the provisions of 29 CFR §1904.

*g. Implement measures to ensure safe egress and access to containers and materials during characterization, disposal and restaging operations.*

Site controls were implemented in accordance with both the HASP and the EPA-approved task-specific Work Plans. Such measures included providing clear access for equipment (dollies, lifts, etc.), structural enhancements, and appropriate fall protection. Compliance was assessed and enforced through proper supervision and independent inspection.

*h. Prepare an air monitoring plan and perform air monitoring, as required, to ensure worker safety during removal activities;*

Air monitoring was conducted throughout the project in accordance with the HASP, with special emphasis during times when tear gas products and unknown materials were handled. No exceedances of project action levels were detected outside of the containment structures. In addition, no irritant odors were detected outside of containment structures.

During abatement of asbestos-containing coating materials inside the AST Shed, air monitoring and asbestos clearance sampling were performed in accordance with the Vermont Regulations for Asbestos Control. Final air clearance samples were below the applicable standard, as detailed in Summary Report #2.



- i. *Develop task specific Work Plans which include Quality Assurance/Quality Control (QA/QC) procedures.*

Separate Work Plans were developed for each distinct phase of work as response actions progressed. Initially, a General Work Plan was submitted in order to meet the response deadline provided in the AOC. Task-specific Work Plans were then developed and submitted as sufficient information became available concerning the scope of work to be performed, the methods to be employed, and the identification of appropriate subcontractors and their preferred procedures.

#### General Work Plan

The Respondents submitted a General Work Plan dated March 21, 2008, to EPA. The plan provided a conceptual outline of the management approach, the commitment of Respondent resources, and the general approach to the specific tasks required under the Administrative Order of Consent. The Work Plan was approved by EPA with minor comments on April 2, 2008.

#### Pyrotechnic Material

On March 14, 2008, the Respondents submitted to EPA a letter outlining a plan for the proposed temporary relocation of one 6-gallon and three 30-gallon containers of flammable solid “Standard Fuel Mix” from the 1924 Building to an outdoor storage bunker. In addition, the letter indicated that efforts to identify an outlet for sale, disposal, or re-use of the material would continue, with a goal of permanently moving the containers from the property as quickly as possible. EPA approved the proposed relocation on March 17, 2008.

#### Lead-contaminated Sand Blast Grit and Soil

The Respondents submitted a document entitled *Work Plan, Characterization and Removal of Sandblasting Grit and Soil, Vermont Mill Properties Site, 160-180 Benmont Avenue, Bennington Vermont* on March 31, 2008. The Work Plan was prepared to address, specifically, the soil and debris located in roll-off containers on the subject property, as well as any residual debris that was located in former stockpile areas. Following incorporation of EPA comments, a revised plan was submitted and approved by EPA on April 4, 2008.

#### Hazardous Wastes

The Respondents submitted a draft *Work Plan for the Characterization and Disposal of Hazardous Wastes* to EPA on April 18, 2008. The work plan was prepared to address the proper characterization, management, handling, and disposal of wastes from the spaces that are occupied and/or leased by MSI. On April 25, 2008, EPA provided comments on the Work Plan, and requested additional clarification of the specific methodology for drum segregation and characterization. A Standard Operating Procedure for container opening, sampling, and management was discussed with EPA on April 28, 2008, and implemented in the days thereafter.

### Bulk CS-1 Tear Agent

On May 12, 2008, the Respondents submitted to EPA a Work Plan for the disposal of bulk CS-1 product. The work plan was prepared to address the proper management, handling, and disposal of the material.

*j. Develop task specific sampling and analysis plans ("SAP") for sampling, identification and hazard characterization of all waste and materials located at the Site which has been designated by the OSC as requiring disposal or restaging (e.g., sampling will include, but not be limited to, all drums and containers of waste material located in the 1924 and Cold Storage building, 2-chlorobenzalmalononitrile material, debris material stored in roll-off containers stored at the site, soil samples).*

Task specific sampling and analysis plans were included in the individual Work Plans described above.

For closure of the ASTs, the methods described in the *Work Plan for the Characterization and Disposal of Hazardous Wastes* were used to characterize the tank contents and miscellaneous containers. A separate Work Plan or SAP was not prepared for this phase of the work.

*k. Based on the results of the sampling, perform consolidation, appropriate segregation, staging and offsite disposal of materials at an EPA approved disposal facility.*

Separate staging areas were established for the various waste streams based on handling and safety requirements. Waste ammunition was segregated in the first floor shipping area of the main mill building. Pyrotechnic material was moved to an outdoor storage bunker pending sale and shipping to a customer. Containerized wastes were moved to the first floor of the 1924 building and organized in accordance with chemical compatibility and planned order of shipping. All other wastes were moved directly from the location of discovery into transport vehicles for off-site disposal.

### Waste Ammunition

Waste ammunition, consisting of various style projectiles (e.g., wood rounds, rubber batons, foam batons), each with a charge of black powder or pistol primer (i.e., live rounds), was staged in the first floor shipping area following classification and repackaging. Veolia Technical Solutions, Inc. (Veolia) performed all handling, including transfer into over-pack drums or other appropriate shipping containers, labeling, loading, transport, and disposal. On April 30, 2008, a memo was submitted to EPA documenting the completed packaging as well as the suitability of the temporary staging area for storage.



### Containerized Waste

All waste containers were moved from the separate containment structures to an available space on the first floor of the 1924 Building. The staging area was cordoned off as an Exclusion Zone in accordance with the Health and Safety Plan for the project.

Waste containers were appropriately packaged, decontaminated, and labeled for off-site disposal prior to relocation. Containers inside the buildings on the second floor were moved on pallets with a pallet jack to a forklift-accessible window in the Cold Storage Building. A rubber-tired telescoping forklift was then used to move palletized containers to ground level. Pallets and containers were carefully rigged and secured under the supervision of a properly-trained safety professional. Containers on the first floor level were moved on pallets via pallet jack or forklift directly to the staging area.

Once inside the staging area, containers were segregated into the appropriate waste streams and arranged with suitable access aisles. Consolidation to the staging area was completed on May 6, 2008. Containers remained inside the staging area for approximately 16 weeks pending resolution of waste codes and proper shipping names, follow-up sampling, profile revisions, disposal facility acceptance, and vendor scheduling. During this period, the storage area was kept locked and was inspected periodically to observe for leaks or other changed conditions.

<p><i>1. Per the direction of the OSC, assess and characterize any additional hazardous materials discovered during the course of this action.</i></p>
--

### Aboveground Storage Tanks

During the course of the 2008 waste removal actions, the OSC noted the presence of two 10,000-gallon ASTs inside an enclosed loading dock (AST Shed) on the northern side of the building. The tanks had previously stored #6 fuel oil for facility heating, but had been out of service since acquisition of the property by the current owners. One of the tanks was found to be covered with an asbestos-containing tank wrap. The OSC mandated removal or proper closure of the tanks.

During May and June 2009, the ASTs were removed from the site as described in Summary Report #2.

### Asbestos Inspection Reports - Benmont Mill Properties, Inc.

EPA requested copies of all asbestos inspection reports, studies, and surveys that had been completed for the Mill property. Copies of all available reports were submitted to EPA on May 5, 2008.

*m. Due to being stored outside for an extended period of time and being exposed to extremes of temperature, random sampling of approximately 10% of 2-chlorobenzalmalononitrile containers located within the Cold Storage and 1924 buildings is required to determine the present condition of the materials for identification and hazard categorization for threat analysis. OSC to determine the containers requiring sampling;*

Initial efforts to assess the condition of the CS-1 tear gas agent in response to this requirement revealed that only a very limited number of specialty laboratories were equipped to handle the material. Further, various experts indicated that the material would likely be effective as tear gas even if it did not meet the original military specification under which it was manufactured. Therefore, it was concluded, and EPA concurred, that sampling and analysis was unlikely to produce meaningful information.

MSI explored several options for management and disposition of approximately 54,000 pounds of CS-1 tear gas agent that was stored in wooden crates on the second floors of the Cold Storage and 1924 Buildings. After evaluating the options, and in consideration of EPA requirements for proper storage of this material, MSI elected to dispose of the majority of the material as waste. Alternatives included construction of a suitable storage area on site, relocation to an alternate site, bulk sale to one or more customers in the US and abroad, and disposal.

Of the 54,400 pounds of material originally on site, 6,720 pounds (168 crates on 21 pallets) were sold to existing customers (following EPA approval), 40 pounds (one crate) were retained on hand for use in product formulations, and the balance (47,640 pounds, or 149 pallets) was shipped for disposal. Further details and disposal documentation were provided in Summary Report #1.

*n. Arrange for disposal of all waste streams, including decontamination waste and spent PPE (e.g., including, but not be limited to, all drums and containers of waste material located in the 1924 and Cold Storage building, debris material stored in roll-off containers stored at the site, contaminated soils),*

#### Pyrotechnic Materials

On March 26, 2008, the Respondents requested, by letter, EPA approval for the sale of the flammable solid “Standard Fuel Mix” that had been moved from the 1924 Building to an outdoor storage bunker. On the same day, EPA approved the sale of 308 pounds of the material to Combined Systems, Inc.

#### Hazardous Soil and Demolition Debris

On May 22, 2008, EPA approved Stabllex Canada for end disposal of two roll-offs containing soil and demolition debris that had failed Toxicity Characteristic Leaching Procedure (TCLP) testing for lead. Upon review of additional submittals, EPA also approved New England Disposal Technologies, Inc. (NEDT) for transportation of the roll-off containers to Stabllex Canada.

### Non-Hazardous Soil

Upon commencement of response actions at the site, eight roll-off containers were present on the property and had been partially filled with soil generated during initial cleanup of stockpiled sandblast grit. An additional 20 cubic yards were generated as part of the AOC-driven response actions.

On May 22, 2008, EPA concurred with the Wilcox & Barton, Inc. recommendation to place the 20-cubic yard stockpile of non-hazardous soil and grit into the existing roll-offs. On this same date, EPA approved transportation of this material for disposal to the Waste USA landfill in Coventry, Vermont.

### Waste Ammunition

The proposed waste profile, waste codes, and manifest for ammunition disposal were approved by EPA via email on May 20, 2008. Veolia was approved for transportation and disposal of this waste stream by EPA on April 25, 2008.

### Hazardous Wastes (Containerized)

A proposed disposal inventory with waste code assignments was initially submitted to EPA on May 12, 2008. EPA, in consultation with VTDEC, provided several rounds of comments on the proposed waste codes and proper shipping names. EPA also required additional sampling and analysis of certain containers. On July 28, 2008, EPA concurred with the final inventory, the proposed waste characterization, disposal profiles, and manifests, and issued approval to transport the wastes from the site.

### Non-Hazardous Waste (Containerized)

On April 25, 2008, EPA approved Cyn Oil Corporation (Stoughton, Massachusetts) for disposal of non-RCRA, non-DOT regulated wastes and empty containers. Manifests and disposal profiles were approved by EPA on July 28, 2008.

### Bulk CS-1 Tear Gas Agent

On May 19, 2008, EPA approved disposal of the bulk CS-1 product at the Veolia facility in Port Arthur, Texas, in accordance with the Work Plan and based upon the manifest documents provided. As described in Summary Report #1, a DOT waiver was received on May 16, 2008, authorizing one-way shipment of the material in its original containers for disposal purposes.

### Asbestos-Containing Tank Coating Waste

On June 10, 2009, EPA approved Modern Trash Removal of York, Inc. for end disposal of asbestos containing wastes from the site.

#### Oily Debris and Floor Rinsate – AST Shed

On June 17, 2009, the Respondents submitted proposed manifests and profiles for disposal of oily debris containing asbestos fibers generated during cleanup of the AST shed. EPA approved the shipping documents and end-disposal facility (Republic/Pine Grove Landfill) on June 23, 2009. The proposed profile and manifest for transport of the floor rinsate to Enpro Services of Vermont, Inc. (EVI) in Williston, Vermont was approved by EPA on June 25, 2009.

#### Tank Contents and Cleaning Waste

Shipment of residual #6 fuel oil to Cyn Oil Corporation for energy recovery was approved by EPA on June 10, 2009. The proposed manifest and profile for shipment of tank sludge and cleaning waste to EVI was approved by EPA via email on June 16, 2009.

#### Miscellaneous Containers – AST Shed

On June 23, July 13, and July 23, 2009, EPA approved the proposed shipping documents and disposal facility (EVI, Williston, Vermont) for RCRA Empties, unknown product, and consolidated oily waste generated from containers discovered in the AST Shed.

#### Construction and Demolition Debris

On June 17, 2009, the Respondents submitted proposed manifests and profiles for general non-contaminated construction and demolition debris generated during AST closure and other activities at the site. EPA approved the shipping documents and disposal facility on June 23, 2009.

#### Elevator Soil Stockpile

EPA approved disposal of the elevator soil stockpile at Environmental Soil Management, Inc. in Loudon, New Hampshire via email on June 6, 2009. Proposed shipping documents (manifest and profile) were approved by EPA on June 23, 2009.

#### Pellet Room Decontamination Waste

On June 19, 2009, EPA approved the proposed manifest and profile for shipment of chloroacetophenone (CN) - and CS-contaminated ductwork to EVI in Williston, Vermont. On June 25, 2009, EPA approved the proposed manifest and profile for shipment of lead-based paint chips to EVI. Asbestos waste generated during pellet room decontamination and ductwork/exhaust vent disassembly was consolidated with asbestos wastes from AST abatement.

*o. Removal of hazardous materials being stored on site for use or sale to appropriate storage locations on or off site to ensure safety of the public and the environment;*

Following completion of the inventory and waste removal, MSI established a Hazardous Material Storage Room for the storage of raw materials, and a Hazardous Waste Storage Room for the storage of raw materials and drums of chemical waste. One 55-gallon drum is utilized for the accumulation of hazardous waste. The drum receives waste generated during testing of the products in the second floor Production Room.

These rooms are the sole locations for storage of hazardous materials and hazardous wastes generated by MSI. MSI has hired a full time Safety, Health, and Environmental Manager to monitor compliance with these requirements. The rooms are locked at all times when not being actively accessed, and the containers are stored on pallets and labeled in accordance with RCRA and Vermont Hazardous Waste Management Regulations (VHMR).

All other materials identified in the original inventory and during subsequent work at the site have been removed and disposed of at approved facilities.

*p. Disposal of materials in accordance with 40 CFR Part 300.440 Procedures/or Planning and Implementing OJJ-Site Response Actions. Determine that all disposal facilities are in compliance with the CERCLA Off Site Rule (40 CFR Part 300.440) or are deemed to be more appropriate facilities as approved in writing by the OSC; and*

#### Pyrotechnic Materials

A total of 308 pound of “Standard Fuel Mix” was shipped to Combined Systems, Inc. on April 11, 2008. Copies of the shipping papers were submitted to EPA on April 16, 2008. Additional discussion is provided in Summary Report #1.

#### Hazardous Soil and Demolition Debris

On May 28 and 29, 2008, NEDT transported two roll-off containers of RCRA hazardous lead-contaminated soil and debris to the Stablax Canada facility in Blainville, Quebec. Disposal documentation, including signed manifests and Disposal Certificates, was provided in Appendix C of Summary Report #1.

#### Non-Hazardous Soil

In May and June 2008, TAMS Transportation transported 10 roll-off containers of non-hazardous lead-contaminated soil to the Waste USA landfill in Coventry, Vermont. Disposal documentation was provided in Appendix D of Summary Report #1.

#### Waste Ammunition

On May 21, 2008, Veolia transported the waste ammunition to their facility in Sauget, Illinois for disposal by incineration. Signed manifests were provided in Appendix E of Summary Report #1. Copies of final Certificates of Destruction were not available in time for production of that report, but are included herein as Attachment A for the record.

#### Hazardous Waste (Containerized)

On August 27 and 28, 2008, 21<sup>st</sup> Century Environmental Management, Inc. of Rhode Island transported the containers of hazardous waste to the Northland Environmental, Inc. facility in Providence, Rhode Island for disposal. Disposal documentation was provided in Appendix F of Summary Report #1.

#### Non-Hazardous Waste (Containerized)

On August 28, 2008, Cyn Environmental Services transported the remaining non-RCRA, non-DOT regulated wastes and empty containers to the Cyn Oil Corporation facility in Stoughton, Massachusetts for recycling. Disposal documentation, including signed manifests and profiles, was provided in Appendix G of Summary Report #1.

#### Bulk CS-1 Tear Gas Agent

On May 22, 2008, Freehold Cartage Inc. transported 14,080 pounds of CS-1 product to the Veolia facility in Port Arthur, Texas for disposal. The total shipment weight, including packaging, was 33,088 pounds.

On May 23 and 29, and June 3, 2008, SJ Transportation Company transported shipments of 15,360, 12,800, and 5,440 pounds of CS-1 product, respectively, to Veolia in Port Arthur, Texas for disposal. The total shipment weight, including packaging, was 78,412 pounds. Disposal was by incineration.

Disposal documentation, including signed manifests and Certificates of Destruction, were provided in Appendix H of Summary Report #1.

#### Asbestos-Containing Tank Coating Waste

Asbestos-containing waste generated during AST abatement was transported to the Alderson, Inc. (Alderson) facility in Burlington, Vermont on June 5 and 24, 2009. The wastes are stored there in accordance with facility permits pending transportation to the end disposal facility, as described in Summary Report #2. Documentation of this shipment was provided as Appendix E of that report.



### Oily Debris and Floor Rinsate

Asbestos-containing oily debris generated during cleanup of the AST Shed was placed into nine 55-gallon drums. Rinsate from floor cleaning was also containerized in a 55-gallon drum.

On June 25, 2009, Enpro Services, Inc. (Enpro) transported the wastes to EVI in Williston, Vermont for temporary storage pending consolidation and transport to end disposal facilities. Transportation and documentation of receipt at an EPA-permitted Treatment, Storage, and Disposal Facility (TSDF) was provided in Appendices F and G of Summary Report #2.

### Tank Contents and Cleaning Wastes

On June 10, 2009, Enpro transported approximately 4,000 gallons of #6 fuel oil to Cyn Oil Corporation in Stoughton, Massachusetts for recycling/energy recovery. A copy of the facility-signed manifest is provided in Attachment B.

On June 17, 2009, Enpro transported four 55-gallon drums of #6 fuel oil and eight 55-gallon drums of #6 fuel oil sludge to EVI in Williston, Vermont, for temporary storage pending consolidation and shipping to approved end-disposal facilities. A copy of the facility signed manifest is provided in Attachment B.

### Aboveground Storage Tanks and Piping

On June 18 and 25, 2009, the cleaned and abated 10,000-gallon ASTs and metal piping were transported to TAM, Inc. in Shaftsbury, Vermont for reclamation as scrap metal. Tank disposal documentation was provided in Appendix O of Summary Report #2.

### Miscellaneous Containers - AST Shed

On July 15, 2009, Enpro transported miscellaneous containers of oil, oily solids, unknown product, and "RCRA Empty" containers to EVI in Williston, Vermont for temporary storage pending consolidation and transportation to approved end-disposal facilities. EPA-approved manifests and profiles were provided in Appendices I through L of Summary Report #2. Facility-signed manifests are included in Attachment B.

### Construction and Demolition Debris

The construction and demolition debris waste stream consisted of general waste with origins outside of contaminated areas which had not come into contact with project-related contaminants. Materials were placed into a dumpster near the point of generation and transported by TAM, Inc. to the Moretown Landfill in Moretown, Vermont on July 15, 2009. A copy of the EPA-reviewed manifest and profile were provided in Appendix P of Summary Report #2.

### Elevator Soil Stockpile

A soil pile of approximately 5 cubic yards was generated during non-waste removal action-related renovation of an elevator shaft inside the main mill building. Analytical testing revealed a low concentration of petroleum hydrocarbons, but the material was not characterized as hazardous waste.

On June 25, 2009, Enpro transported the soil to Environmental Soil Management, Inc. in Loudon, New Hampshire for disposal. Documentation of facility receipt was provided in Appendix Q of Summary Report #2.

### Pellet Room Decontamination Wastes

A total of 12 one-yard, lined fiberboard boxes (T-packs) containing CN- and CS-contaminated materials, disassembled ventilation system components, and used PPE were generated during the Pellet Room cleanup. A 5-gallon pail of paint chips generated during wall scraping was found to be RCRA hazardous for lead based on TCLP testing. On June 25, 2009, CN- and CS-contaminated and lead-based paint wastes generated during Pellet Room cleaning were transported to EVI in Williston, Vermont for temporary storage pending consolidation and transport to approved end-disposal facilities.

Asbestos containing material was abated by Alderson during removal of the exhaust vent for the Pellet Room. The material was consolidated with the tank coating material removed from the AST (discussed above). On June 5, 2009, asbestos-containing waste was transported to Alderson's Burlington, Vermont, facility for storage pending end disposal.

<p><i>q. Provide and affix all appropriate labels in accordance with state and federal regulations for storage, transportation, and/or disposal of waste streams, as appropriate</i></p>
--

### Hazardous Waste

Each container was labeled with the appropriate waste codes and other required information [per RCRA and VHMR) and stored in the staging areas until the containers were loaded for off-site disposal.

### Hazardous Material and Waste Storage

Each container maintained on the site is appropriately labeled in accordance with RCRA and VHMR. The current storage areas are maintained in compliance with applicable RCRA and VHMR requirements.

### **3.0 Other Tasks Completed**

#### Pellet Room

From May 28 through June 24, 2009, Enpro decontaminated a former manufacturing area (Pellet Room) where residual tear gas agent was present. In addition, Enpro and Alderson removed and disposed of miscellaneous ductwork and ventilation conduits with residual CN and CS tear gas agent and associated asbestos-containing materials.

On June 5, 2009, asbestos-containing wastes were transported to Alderson's Burlington, Vermont, facility for storage pending end disposal. On June 25, 2009, CN- and CS-contaminated and lead-based paint wastes generated during Pellet Room cleaning were transported to EVI in Williston, Vermont for temporary storage pending consolidation and transport to approved end-disposal facilities.

These activities were documented in a report entitled *Summary Report, Pellet Room Decontamination, Mace Security International, Inc., 160 Benmont Avenue, Bennington, Vermont* dated July 24, 2009. Hard copies of the report were submitted to EPA on August 4, 2009. Documentation for the transportation and disposal of wastes, including profiles and facility-signed manifests, was provided in Appendix D of the report.

#### Spill Prevention, Control, and Countermeasure Plan

Wilcox & Barton, Inc. prepared a Spill Prevention, Control, and Countermeasure Plan covering all MSI operations at the facility. The plan was implemented at the facility in December 2008. A copy is available to EPA upon request.

#### RCRA and Clean Air Act Inquiry

On March 14, 2008, the Respondents received a *Request for Information Issued Pursuant to Section 3007 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6927, Section 104(e)(2) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), 42 U.S.C. § 9604, and Section 114(a)(1) of the Clean Air Act (CAA) 42 U.S.C. § 7414(a)(1)* dated April 12, 2008. The request demanded responses to 40 multi-part questions concerning RCRA compliance and 21 questions concerning Clean Air Act compliance at the facility. The inquiry encompassed the operations of the landlord(s) and all tenants at the site.

On April 28, 2008, the Respondents submitted a comprehensive response to the request. Many of the questions had been rendered moot by AOC-required response actions. Others required completion of additional studies or preparation of additional plans. The response included a new Evacuation Plan for the facility as well as a complete Hazardous Operations review of MSI operations.

As of the date of this Final Consolidated Summary Report, no response or further inquiry has been received from EPA.

### Site Characterization Work

Following cleanup of residual lead-contaminated soil and sandblast grit from the former stockpile areas at the rear portion of the property in April and May of 2008, the Respondents conducted a program of surface and subsurface investigation. The results of the investigation were documented in three letter reports submitted to EPA:

- *Results of Sandblast Grit Stockpile Area Evaluation, Vermont Mill Properties Site, May 7, 2008.*
- *Results of Additional Evaluation of Sandblast Grit Stockpile Area SP-3, Vermont Mill Properties Site, May 19, 2008.*
- *Results of Subsurface Evaluation, Stockpile Area SP1, Vermont Mill Properties Site, Bennington, Vermont, May 8, 2008.*

Concerning shallow soil, Wilcox & Barton, Inc. concluded that the concentrations of arsenic detected in shallow soil were statistically equivalent to background conditions. Follow-up removal and investigation were recommended and completed at one location where elevated lead was detected (SP-3). PCB concentrations were below risk-based benchmark concentrations, but documentation of the exposure assumptions and completion of a Stage I Ecological Risk Assessment were recommended, followed by placement of a clean soil cap and management using institutional controls.

Temporary groundwater monitoring wells were installed within each of the former stockpile areas to evaluate potential impacts to groundwater from leaching of metals in shallow soil. The measured concentrations of naphthalene in both the primary and duplicate samples from well MW-1 exceeded the VTDEC groundwater enforcement standard of 20.0 micrograms per liter. The detected concentrations of benzo(a)pyrene were only slightly above the standard. No other exceedances of Vermont Groundwater Enforcement Standards (VGES) were detected in any stockpile area, indicating that groundwater did not appear to have been impacted by the storage of sandblast grit on the site.

On April 8, 2008, during installation of a temporary groundwater monitoring well in the area of former stockpile SP-1, Wilcox & Barton, Inc. encountered stained soil exhibiting a creosote-like odor at and below the water table depth. Pursuant to direction from the EPA OSC present on that day, Wilcox & Barton, Inc. returned to the site on April 17, 2008 to collect a soil sample.

Benzo(a)anthracene and benzo(a)pyrene were detected at concentrations above both EPA Region 3 Risk-based Concentrations and EPA Region 9 Preliminary Remediation Goals for industrial land use. The subsurface findings in both soil and groundwater at this location were presumed to be related to a former tail race beneath the mill, and possibly associated with historical conditions that had been previously investigated by VTDEC.

As of the date of this Final Consolidated Summary Report, a response from EPA or VTDEC concerning these findings and recommendations has not been received.

#### 4.0 Activities Remaining

Several of the waste streams described in the preceding sections are temporarily stored at permitted off-site TSD facilities pending consolidation and transfer to approved end-disposal facilities. The following end-disposal facility approvals have been received from EPA:

Waste Stream	Currently Stored at:	Approved Facility
Asbestos-containing tank coating - AST Shed	Alderson	Modern Trash Removal of York, Inc., York, PA
Oily debris w/asbestos - AST Shed	EVI	Republic/Pine Grove Landfill, Amanda, OH
Floor rinsate - AST Shed	EVI	Norlite, Cohoes, NY
Tank sludge and cleaning fluids – AST Shed	EVI	Norlite, Cohoes, NY
Oily solids and RCRA Empties – AST Shed	EVI	Republic/Pine Grove Landfill, Amanda, OH
Consolidated oil and unknown product – AST Shed	EVI	Norlite, Cohoes, NY
T-Packs - Pellet Room	EVI	Rineco Chemical Industries, Benton, AR
Paint chips - Pellet Room	EVI	Stablex Canada, Blainville, Quebec

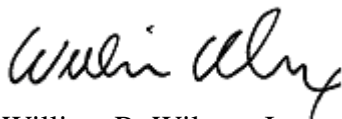
Asbestos waste stored at Alderson's Burlington, Vermont, facility is expected to be shipped to Modern Landfill in York, Pennsylvania upon generation of a full load of material.

Shipment of all other waste streams to the approved end-disposal facilities is anticipated to occur in early September 2009.

#### 5.0 Summary

As detailed above, all AOC-required response actions at the site proper have been completed. EPA provided input and approval for all key steps of this response action, including approval of proposed contractors, waste characterization and shipping determinations, and selection of storage and disposal facilities. All efforts have been pursued with careful planning and diligence, subject to constraints imposed by facility operations, technical considerations, contractor availability, and available funding. No further actions are required to comply with the terms of the AOC, aside from shipment of waste streams to ultimate end-disposal facilities.

Respectfully submitted,



William R. Wilcox, Jr.  
Project Coordinator

Attachment A  
Attachment B

Certificate of Destruction – Waste Ammunition  
Completed Disposal Documentation – AST Shed Wastes

**Attachment A**  
**Certificate of Destruction – Waste Ammunition**







# Fax Coversheet

TO: *Eren*

COMPANY: *781-341-8867*

FAX NUMBER:

FROM: *Marin*

DATE: *8/27/09*

**THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED, AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED OR CONFIDENTIAL.**

If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, you are notified that any dissemination or distribution of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone, and return the original message to us by mail. Thank You.

Number of Total Pages Including Cover: *13*

Special Comments / Instructions:

Veolia ES Technical Solution LLC  
Federal EPA ID: ILD098642424  
State EPA ID: 1631210009  
7 Mobile Avenue  
Saugat, IL 62201-1069  
(618)271-2804

MACE SECURITY INTERNATIONAL  
ATTN: MANIFEST SECTION  
VTD998376580  
160 BENMONT AVE  
BENNINGTON, VT 05201

Certificate of Destruction

Trade Waste Incineration has received waste material from  
MACE SECURITY INTERNATIONAL on 06/05/2008  
as described on [State Manifest or Uniform] Hazardous Waste Manifest number(s)  
000199710VES

Profile Number:	950583
OES Tracking ID:	326909
Process:	Rotary Kiln Incineration
Treatment Date:	04/01/2009
Total Pieces Destroyed:	25

I certify, on behalf of the above listed treatment facility  
that to the best of my knowledge, the above-described waste  
was managed in compliance with all applicable laws,  
regulations, permits, and licenses on the date listed above.



Gary F. Brehe

Certificate #: 157914  
08/27/2009

Invoice Customer:  
City:

VEOLIA ES TECHNICAL SOLUTIONS  
MARLBORO

Veolia ES Technical Solution LLC  
Federal EPA ID: ILD098642424  
State EPA ID: 1631210009  
7 Mobile Avenue  
Sauget, IL 62201-1089  
(618)271-2804

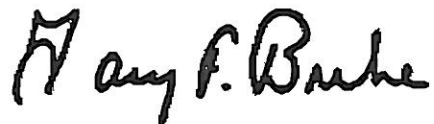
MACE SECURITY INTERNATIONAL  
ATTN: MANIFEST SECTION  
VTD988375580  
160 BENMONT AVE  
BENNINGTON, VT 05201

Certificate of Destruction

Trade Waste Incineration has received waste material from  
MACE SECURITY INTERNATIONAL on 06/05/2008  
as described on [State Manifest or Uniform] Hazardous Waste Manifest number(s)  
000199710VES

Profile Number:	950584
OES Tracking ID:	326810
Process:	Rotary Kiln Incineration
Treatment Date:	11/06/2008
Total Pieces Destroyed:	4

I certify, on behalf of the above listed treatment facility  
that to the best of my knowledge, the above-described waste  
was managed in compliance with all applicable laws,  
regulations, permits, and licenses on the date listed above.



Gary F. Brehe

Certificate #: 157915  
08/27/2009

Invoice Customer:  
City:

VEOLIA ES TECHNICAL SOLUTIONS  
MARLBORO

Veolia ES Technical Solution LLC  
Federal EPA ID: ILD068642424  
State EPA ID: 1631210009  
7 Mobile Avenue  
Sauget, IL 62201-1069  
(618)271-2904

MACE SECURITY INTERNATIONAL  
ATTN: MANIFEST SECTION  
VTD069375690  
160 BENMONT AVE  
BENNINGTON, VT 05201

Certificate of Destruction

Trade Waste Incineration has received waste material from  
MACE SECURITY INTERNATIONAL on 08/06/2008  
as described on [State Manifest or Uniform] Hazardous Waste Manifest number(s)  
000199710VES

Profile Number:	950585
OES Tracking ID:	326911
Process:	Rotary Kiln Incineration
Treatment Date:	11/06/2008
Total Pieces Destroyed:	6

I certify, on behalf of the above listed treatment facility  
that to the best of my knowledge, the above-described waste  
was managed in compliance with all applicable laws,  
regulations, permits, and licenses on the date listed above.



Gary F. Brehe

Certificate #: 157916  
08/27/2009

Invoice Customer:  
City:

VEOLIA ES TECHNICAL SOLUTIONS  
MARLBORO

Veolia ES Technical Solution LLC  
Federal EPA ID: ILD098642424  
State EPA ID: 1631210009  
7 Mobile Avenue  
Sauget, IL 62201-1069  
(618)271-2804

MACE SECURITY INTERNATIONAL  
ATTN: MANIFEST SECTION  
VTD986375580  
180 BENMONT AVE  
BENNINGTON, VT 05201

Certificate of Destruction

Trade Waste Incineration has received waste material from  
MACE SECURITY INTERNATIONAL on 06/05/2008  
as described on [State Manifest or Uniform] Hazardous Waste Manifest number(s)  
000189710VES

Profile Number:	950586
OES Tracking ID:	326912
Process:	Rotary Kiln Incineration
Treatment Date:	02/12/2009
Total Pieces Destroyed:	1

I certify, on behalf of the above listed treatment facility  
that to the best of my knowledge, the above-described waste  
was managed in compliance with all applicable laws,  
regulations, permits, and licenses on the date listed above.



Gary F. Brehe

Certificate #: 167917  
08/27/2009

Invoice Customer:  
City:

VEOLIA ES TECHNICAL SOLUTIONS  
MARLBORO

Veolia ES Technical Solution LLC  
Federal EPA ID: ILD098642424  
State EPA ID: 1631210009  
7 Mobile Avenue  
Sauget, IL 62201-1069  
(618)271-2804

MACE SECURITY INTERNATIONAL  
ATTN: MANIFEST SECTION  
VTD988375580  
160 BENMONT AVE  
BENNINGTON, VT 05201

Certificate of Destruction

Trade Waste Incineration has received waste material from  
MACE SECURITY INTERNATIONAL on 08/05/2008  
as described on [State Manifest or Uniform] Hazardous Waste Manifest number(s)  
000199710VES

Profile Number:	960687
OES Tracking ID:	326913
Process:	Rotary Kiln Incineration
Treatment Date:	11/06/2008
Total Pieces Destroyed:	3

I certify, on behalf of the above listed treatment facility  
that to the best of my knowledge, the above-described waste  
was managed in compliance with all applicable laws,  
regulations, permits, and licenses on the date listed above.



Gary F. Brehe

Certificate #: 157919  
08/27/2009

Invoice Customer:  
City:

VEOLIA ES TECHNICAL SOLUTIONS  
MARLBORO



Veolia ES Technical Solution LLC  
Federal EPA ID: ILD098842424  
State EPA ID: 1631210009  
7 Mobile Avenue  
Sauget, IL 62201-1089  
(618)271-2804

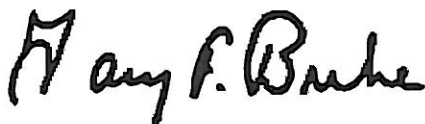
MACE SECURITY INTERNATIONAL  
ATTN: MANIFEST SECTION  
VTD988375580  
160 BENMONT AVE  
BENNINGTON, VT 05201

Certificate of Destruction

Trade Waste Incineration has received waste material from  
MACE SECURITY INTERNATIONAL on 06/05/2008  
as described on [State Manifest or Uniform] Hazardous Waste Manifest number(s)  
000199710VES

Profile Number:	950588
OES Tracking ID:	326914
Process:	Rotary Kiln Incineration
Treatment Date:	11/06/2008
Total Pieces Destroyed:	12

I certify, on behalf of the above listed treatment facility  
that to the best of my knowledge, the above-described waste  
was managed in compliance with all applicable laws,  
regulations, permits, and licenses on the date listed above.



Gary F. Brehe

Certificate #: 157919  
08/27/2009

Invoice Customer:  
City:

VEOLIA ES TECHNICAL SOLUTIONS  
MARLBORO

Veolia ES Technical Solution LLC  
Federal EPA ID: ILD098642424  
State EPA ID: 1631210009  
7 Mobile Avenue  
Sauget, IL 62201-1069  
(618)271-2804

MACE SECURITY INTERNATIONAL  
ATTN: MANIFEST SECTION  
VTD988375580  
160 BENMONT AVE  
BENNINGTON, VT 05201

---

Certificate of Destruction

---

Trade Waste Incineration has received waste material from  
MACE SECURITY INTERNATIONAL on 06/06/2008  
as described on [State Manifest or Uniform] Hazardous Waste Manifest number(s)  
000199710VES

Profile Number:	950589
OES Tracking ID:	326916
Process:	Rotary Kiln Incineration
Treatment Date:	01/06/2009
Total Places Destroyed:	3

I certify, on behalf of the above listed treatment facility  
that to the best of my knowledge, the above-described waste  
was managed in compliance with all applicable laws,  
regulations, permits, and licenses on the date listed above.



Gary F. Brehe

Certificate #: 157920  
08/27/2009

Invoice Customer:  
City:

VEOLIA ES TECHNICAL SOLUTIONS  
MARLBORO

Veolia ES Technical Solution LLC  
Federal EPA ID: ILD098642424  
State EPA ID: 1631210009  
7 Mobile Avenue  
Sauget, IL 62201-1069  
(618)271-2804

MACE SECURITY INTERNATIONAL  
ATTN: MANIFEST SECTION  
VTD988375580  
160 BENMONT AVE  
BENNINGTON, VT 05201

Certificate of Destruction

Trade Waste Incineration has received waste material from  
MACE SECURITY INTERNATIONAL on 08/05/2008  
as described on [State Manifest or Uniform] Hazardous Waste Manifest number(s)  
000199710VES

Profile Number:	950590
OES Tracking ID:	326916
Process:	Rotary Kiln Incineration
Treatment Date:	04/27/2009
Total Pieces Destroyed:	1

I certify, on behalf of the above listed treatment facility  
that to the best of my knowledge, the above-described waste  
was managed in compliance with all applicable laws,  
regulations, permits, and licenses on the date listed above.



Gary F. Brehe

Certificate #: 157921  
08/27/2009

Invoice Customer:  
City:

VEOLIA ES TECHNICAL SOLUTIONS  
MARLBORO

Veolia ES Technical Solution LLC  
Federal EPA ID: ILD088642424  
State EPA ID: 1631210009  
7 Mobile Avenue  
Sauget, IL 62201-1069  
(618)271-2804

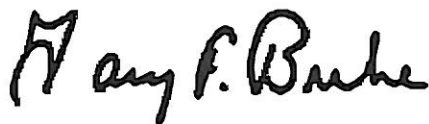
MACE SECURITY INTERNATIONAL  
ATTN: MANIFEST SECTION  
VTD68375580  
160 BENMONT AVE  
BENNINGTON, VT 05201

Certificate of Destruction

Trade Waste Incineration has received waste material from  
MACE SECURITY INTERNATIONAL on 08/05/2008  
as described on [State Manifest or Uniform] Hazardous Waste Manifest number(s)  
000199710VES

Profile Number:	950591
OES Tracking ID:	326917
Process:	Rotary Kiln Incineration
Treatment Date:	01/09/2009
Total Pieces Destroyed:	1

I certify, on behalf of the above listed treatment facility  
that to the best of my knowledge, the above-described waste  
was managed in compliance with all applicable laws,  
regulations, permits, and licenses on the date listed above.



Gary F. Brsbe

Certificate #: 157922  
08/27/2009

Invoice Customer:  
City:

VEOLIA ES TECHNICAL SOLUTIONS  
MARLBORO

Veolia ES Technical Solution LLC  
Federal EPA ID: ILD098842424  
State EPA ID: 1631210009  
7 Mobile Avenue  
Sauget, IL 62201-1069  
(618)271-2804

MACE SECURITY INTERNATIONAL  
ATTN: MANIFEST SECTION  
VTD988375580  
160 BENMONT AVE  
BENNINGTON, VT 05201

Certificate of Destruction

Trade Waste Incineration has received waste material from  
MACE SECURITY INTERNATIONAL on 06/05/2008  
as described on [State Manifest or Uniform] Hazardous Waste Manifest number(s)  
000199710VES

Profile Number:	950592
OES Tracking ID:	326916
Process:	Rotary Kiln Incineration
Treatment Date:	02/12/2009
Total Pieces Destroyed:	5

I certify, on behalf of the above listed treatment facility  
that to the best of my knowledge, the above-described waste  
was managed in compliance with all applicable laws,  
regulations, permits, and licenses on the date listed above.



Gary F. Brehe

Certificate #: 157923  
08/27/2009

Invoice Customer:  
City:

VEOLIA ES TECHNICAL SOLUTIONS  
MARLBORO

Veolia ES Technical Solution LLC  
Federal EPA ID: ILD098642424  
State EPA ID: 1631210009  
7 Mobile Avenue  
Sauget, IL 62201-1069  
(618)271-2804

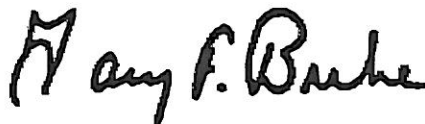
MACE SECURITY INTERNATIONAL  
ATTN: MANIFEST SECTION  
VTD988375580  
160 BENMONT AVE  
BENNINGTON, VT 05201

Certificate of Destruction

Trade Waste Incineration has received waste material from  
MACE SECURITY INTERNATIONAL on 06/05/2008  
as described on [State Manifest or Uniform] Hazardous Waste Manifest number(s)  
000199710VES

Profile Number:	950593
OES Tracking ID:	326919
Process:	Rotary Kiln Incineration
Treatment Date:	01/08/2009
Total Pieces Destroyed:	1

I certify, on behalf of the above listed treatment facility  
that to the best of my knowledge, the above-described waste  
was managed in compliance with all applicable laws,  
regulations, permits, and licenses on the date listed above.



Gary F. Brehe

Certificate #: 157924  
08/27/2009

Invoice Customer:  
City:

VEOLIA ES TECHNICAL SOLUTIONS  
MARLBORO



Veolia ES Technical Solution LLC  
Federal EPA ID: ILD098642424  
State EPA ID: 1631210009  
7 Mobile Avenue  
Sauget, IL 62201-1069  
(818)271-2804

MACE SECURITY INTERNATIONAL  
ATTN: MANIFEST SECTION  
VTD989375580  
160 BENMONT AVE  
BENNINGTON, VT 05201

Certificate of Destruction

Trade Waste Incineration has received waste material from  
MACE SECURITY INTERNATIONAL on 06/05/2008  
as described on [State Manifest or Uniform] Hazardous Waste Manifest number(s)  
000199710VES

Profile Number:	950694
OES Tracking ID:	326920
Process:	Rotary Kiln Incineration
Treatment Date:	01/08/2009
Total Pieces Destroyed:	1

I certify, on behalf of the above listed treatment facility  
that to the best of my knowledge, the above-described waste  
was managed in compliance with all applicable laws,  
regulations, permits, and licenses on the date listed above.



Gary F. Breha

Certificate #: 157925  
08/27/2009

Invoice Customer:  
City:

VEOLIA ES TECHNICAL SOLUTIONS  
MARLBORO

**Attachment B**  
**Completed Disposal Documentation – AST Shed Wastes**



**Hazardous and Non-Hazardous Waste Manifests  
Work Performed from May to July 2009  
Vermont Mill Properties Site  
Bennington, Vermont**

Manifest No.	Waste Stream	Transportation Date	Receiving Facility
Non Hazardous Waste Manifests			
NHZ001 11843	#6 Fuel Oil	June 10, 2009	Cyn Oil Corp.
NHZ001 11847	#6 Fuel Oil Liquid-AST Cleaning	June 17, 2009	EVI, Inc.
NHZ001 11872	Elevator Soil Stockpile	June 25, 2009	ESMI-New Hampshire
NHZ001 11882	C&D Waste	July 15, 2009	Moretown Landfill
Hazardous Waste Manifests			
000874776 GBF	#6 Fuel Oil Sludge-AST Cleaning	June 17, 2009	EVI, Inc.
000874797 GBF	ACM/Oily Debris	June 25, 2009	EVI, Inc.
	Oily Rinsate-Floor Cleaning		
000874798 GBF	CN/CS Waste	June 25, 2009	EVI, Inc.
	Lead Paint Chips		
001030604 GBF	Consolidated Oil from Containers	July 15, 2009	EVI, Inc.
	Consolidated Oily Solids from Containers		
	Unknown Product in Container in AST-2		
	RCRA Empties		
Asbestos Disposal & Documentation Forms			
144503	Asbestos Waste	June 5, 2009	Alderson Environmental
144509	Asbestos Waste	June 24, 2009	Alderson Environmental





NON HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of
3. Generator's Name and Mailing Address Benmont Mill Properties 160 Benmont Avenue Bennington, VT 05201		VTP0000013338		A. Non-Hazardous Manifest Document Number NHZ001 11843
4. Generator's Phone (802) 753-1203		6. US EPA ID Number MA09806+0004		B. S.G.I. (Gen. Site Address)
5. Transporter 1 Company Name ENPRO Services, Inc.		8. US EPA ID Number		C. S.T.I. (Lic. Plate #) MA 56971
7. Transporter 2 Company Name		10. US EPA ID Number		D. Transporter's Phone
9. Designated Facility Name and Site Address CYN OIL Corporation 1771 Washington Street Stoughton, MA 02072		12. Containers No. Type 001 TT		E. S.T.I. (Lic. Plate #)
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) a. Fuel oil (No. 6), NA 1993, P.G. III		13. Total Quantity 4000 G		F. Transporter's Phone
b.		14. Unit Wt/Vol		G. State Facility's ID
c.		I. Waste No.		H. Facility's Phone
d.				
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above Interim Final Interim Final		
a.		b.		
c.		d.		
15. Special Handling Instructions and Additional Information No. 6 fuel oil for recycling				
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and all applicable state laws and regulations.				
Printed/Typed Name William Wilcox		Signature [Signature]		Month Day Year 06/10/09
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature [Signature]		Date 06/10/09
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature [Signature]		Date
19. Discrepancy Indication Space				
20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.				
Printed/Typed Name		Signature		Month Day Year

GENERATOR'S COPY

www.enpro.com

NHZ00111843



# 

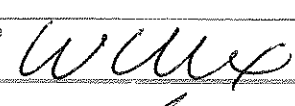
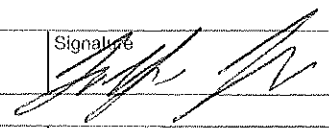
<b>NON HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. VT-P0009613338		Manifest Document No.		2. Page 1 of	
3. Generator's Name and Mailing Address Benmont Mill Properties - MALL 160 Benmont Avenue Bennington, UT 05201 4. Generator's Phone: 802-753-1203						A. Non-Hazardous Manifest Document Number NHZ001 11843	
5. Transporter 1 Company Name ENPRO Services, Inc.						6. US EPA ID Number MA-D480670004	
7. Transporter 2 Company Name						8. US EPA ID Number	
9. Designated Facility Name and Site Address CYN OIL Corporation 1771 Washington Street Stoughton, MA 02072						10. US EPA ID Number MA-D108230377	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) a. Fuel oil CNO. 65, <del>HA</del> NA 1993, P.6 III Virgin Material						12. Containers No.	13. Total Quantity 4000
						Type	14. Unit Wt/Vol 3000 G
b.							Waste No. State
c.							State
d.							State
Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above	
						Interim	Final
15. Special Handling Instructions and Additional Information No. 6 fuel oil for recycling						Point of Departure:	
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and all applicable state laws and regulations.							
Printed/Typed Name William Wilcox AGENT FOR						Signature [Signature]	
						Month Day Year 09/09/99	
17. Transporter 1 Acknowledgement of Receipt of Materials							
Printed/Typed Name Edward J. Conway						Signature [Signature]	
						Month Day Year 06/10/09	
18. Transporter 2 Acknowledgement of Receipt of Materials							
Printed/Typed Name						Signature	
						Month Day Year	
19. Discrepancy Indication Space							
20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.							
Printed/Typed Name Richard Hume						Signature [Signature]	
						Month Day Year 06/11/09	

ORIGINAL-RETURN TO GENERATOR

www.enpro.com

NHZ00111843

# **ENPRO Services, Inc.**

<b>NON HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. <b>VITF101010113B13181</b>		Manifest Document No.		2. Page 1 of 1	
3. Generator's Name and Mailing Address <b>Benmont mill properties 160 Benmont Avenue Bennington VT 05201</b>				A. Non-Hazardous Manifest Document Number <b>NHZ001 11847</b>		B. S.G.I. (Gen. Site Address)	
4. Generator's Phone (802) <b>753-1203</b>				6. US EPA ID Number <b>MAID 9810670004</b>		C. S.T.I. (Lic. Plate #) <b>VT 22809</b>	
5. Transporter 1 Company Name <b>ENPRO Services, Inc.</b>				8. US EPA ID Number		D. Transporter's Phone <b>978-465-1595</b>	
7. Transporter 2 Company Name				10. US EPA ID Number		E. S.T.I. (Lic. Plate #)	
9. Designated Facility Name and Site Address <b>ENPRO Services of Vermont 54 Avenue D Williston VT 05495</b>				10. US EPA ID Number <b>VITR0005117052</b>		G. State Facility's ID <b>SAME</b>	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers		13. Total Quantity	
a. <b>NA 1993, Fuel oil (CNO.C) combustible liquid, P62H</b>				No. Type		14. Unit Wt/Vol	
				01014 DIM		2006	
b.						I. Waste No.	
c.						State <b>NONE</b>	
d.						State <b>VT99</b>	
J. Additional Descriptions for Materials Listed Above				K. Handling Codes for Wastes Listed Above			
a. <b>LD #6 Fuel oil for Recovery, WOP #23741 UT 0609-D ERLHDS</b>				Interim Final Interim Final			
b.				a.			
c.				c.			
15. Special Handling Instructions and Additional Information							
<div style="text-align: right;"> <b>FR contact ENPRO services (800) 766-1162</b> </div>							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and all applicable state laws and regulations.							
Printed/Typed Name <b>William Wilcox Agent for</b>				Signature 		Month Day Year <b>10/11/09</b>	
17. Transporter 1 Acknowledgement of Receipt of Materials				Signature 		Date <b>10/11/09</b>	
18. Transporter 2 Acknowledgement of Receipt of Materials				Signature		Date	
Printed/Typed Name				Signature		Month Day Year	
19. Discrepancy Indication Space							
20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.							
Printed/Typed Name				Signature		Date	
						Month Day Year	

ORIGINAL-RETURN TO GENERATOR

www.enpro.com

NHZ001 11847



<b>NON HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. <b>V11P000013338</b>		Manifest Document No. <b>1144</b>		2. Page 1 of <b>1</b>	
3. Generator's Name and Mailing Address <b>Benmont Mill Properties 160 Benmont Avenue Bellingham, UT 86801</b>				A. Non-Hazardous Manifest Document Number <b>NHZ001 11847</b>			
4. Generator's Phone ( <b>801</b> ) <b>753-1203</b>				B. S.G.I. (Gen. Site Address)			
5. Transporter 1 Company Name <b>ENPRO Services, Inc.</b>		6. US EPA ID Number <b>V11P000013338</b>		C. S.T.I. (Lic. Plate #) <b>UT 9761970</b>		D. Transporter's Phone <b>770-465-155</b>	
7. Transporter 2 Company Name		8. US EPA ID Number		E. S.T.I. (Lic. Plate #)		F. Transporter's Phone	
9. Designated Facility Name and Site Address <b>ENPRO Services, Inc. Cement 54 Avenue D Williston, UT 84455</b>		10. US EPA ID Number <b>V11R0000517052</b>		G. State Facility's ID <b>UT</b>		H. Facility's Phone <b>770-465-155</b>	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers		13. Total Quantity	
a. <b>NA 1992 Fuel Oil (No. 6) combustible liquid, flash</b>				No. <b>004</b> Type <b>DM</b>		14. Unit Wt/Vol <b>200 6</b>	
b.						I. Waste No.	
c.						State <b>UT 97</b>	
d.						State	
J. Additional Descriptions for Materials Listed Above <b>65 lb fuel oil for recovery, WIP # 3374 UT 0609-0, EALDIB 2899</b>				K. Handling Codes for Wastes Listed Above			
a.				Interim		Final	
b.				Interim		Final	
c.				Interim		Final	
d.				Interim		Final	
15. Special Handling Instructions and Additional Information <b>Job # 9318-09</b>							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and all applicable state laws and regulations.							
Printed/Typed Name <b>William Wilcox Agent for</b>				Signature <i>William Wilcox</i>		Month <b>02</b> Day <b>17</b> Year <b>09</b>	
17. Transporter 1 Acknowledgement of Receipt of Materials				Signature <i>Transit</i>		Date	
18. Transporter 2 Acknowledgement of Receipt of Materials				Signature		Date	
19. Discrepancy Indication Space							
20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.							
Printed/Typed Name <b>Jeffrey A. Baker</b>				Signature <i>Jeffrey A. Baker</i>		Month <b>06</b> Day <b>19</b> Year <b>09</b>	

[www.enpro.com](http://www.enpro.com)

7487 NHZOT

GENERATOR'S COPY



# **ENPRO Services, Inc.**

<b>NON HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. <b>VTP0000113338</b>		Manifest Document No.		2. Page 1 of <b>1</b>	
3. Generator's Name and Mailing Address <b>Benmont mill properties 160 Benmont Avenue Bennington, VT 05201</b>				A. Non-Hazardous Manifest Document Number <b>NHZ001 11872</b>			
				B. S.G.I. (Gen. Site Address) <b>Same</b>			
4. Generator's Phone ( <b>802</b> ) <b>753-003</b>				6. US EPA ID Number <b>MA0980670004</b>		C. S.T.I. (Lic. Plate #) <b>NH4564AR</b>	
5. Transporter 1 Company Name <b>ENPRO Services, INC.</b>				8. US EPA ID Number		D. Transporter's Phone <b>978-465-1595</b>	
7. Transporter 2 Company Name				10. US EPA ID Number		E. S.T.I. (Lic. Plate #)	
9. Designated Facility Name and Site Address <b>Environmental Soil Management, Inc of NH 67 International Drive London, NH 03302</b>				12. Containers		F. Transporter's Phone	
				13. Total Quantity		G. State Facility's ID <b>Same</b>	
				14. Unit Wt/Vol		H. Facility's Phone <b>603-783-028</b>	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				No.		I. Waste No.	
a. <b>Non-RCRA, Non DOT</b>				Type		State	
						<b>None</b>	
						<b>None</b>	
J. Additional Descriptions for Materials Listed Above <b>CS) Soils from elevator foundation</b>				K. Handling Codes for Wastes Listed Above			
a.				Interim		Final	
b.				Interim		Final	
c.				Interim		Final	
d.				Interim		Final	
15. Special Handling Instructions and Additional Information <b>1)</b>							
Point of Departure: <b>ER contact ENPRO Services, Inc. 24 hours (800) 966-1162</b>							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and all applicable state laws and regulations.							
Printed/Typed Name <b>William Wilcox Agent for</b>				Signature <b>W Wilcox</b>		Month Day Year <b>10/6/25/09</b>	
17. Transporter 1 Acknowledgement of Receipt of Materials							
Printed/Typed Name <b>Valdemar Estevan</b>				Signature <b>Valdemar</b>		Month Day Year <b>10/6/25/09</b>	
18. Transporter 2 Acknowledgement of Receipt of Materials							
Printed/Typed Name				Signature		Month Day Year	
19. Discrepancy Indication Space							
20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.							
Printed/Typed Name				Signature		Month Day Year	

ORIGINAL-RETURN TO GENERATOR

www.enpro.com

NHZ001 11872



# **ENPRO Services, Inc.**

<b>NON HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. <b>V+P6100113338</b>		Manifest Document No.		2. Page 1 of <b>1</b>	
3. Generator's Name and Mailing Address <b>Beaumont Mill Properties 160 Beaumont Avenue Branford, VT 05601</b>				A. Non-Hazardous Manifest Document Number <b>NHZ001 11872</b>			
				B. S.G.I. (Gen. Site Address) <b>Same</b>			
4. Generator's Phone ( <b>802</b> ) <b>452-1103</b>				C. S.T.I. (Lic. Plate #) <b>NH 4564AR</b>			
5. Transporter 1 Company Name <b>ENPRO Services, INC.</b>				6. US EPA ID Number <b>MA D980670004</b>			
7. Transporter 2 Company Name				8. US EPA ID Number			
9. Designated Facility Name and Site Address <b>Environmental Soil Management, Inc. et al 67 International Drive Lebanon, NH 03302</b>				10. US EPA ID Number <b>MI 1598648555</b>			
				G. State Facility's ID <b>Same</b>			
				H. Facility's Phone <b>(603) 763-028</b>			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers		13. Total Quantity	14. Unit Wt/Vol
				No.	Type		
a. <b>Non-RCRA Non Dot</b>							
							State <b>None</b>
							State <b>None</b>
							State
							State
							State
							State
J. Additional Descriptions for Materials Listed Above <b>(5) Soils from elevator reaction</b>				K. Handling Codes for Wastes Listed Above			
a.				Interim		Final	b.
c.				Interim		Final	d.
15. Special Handling Instructions and Additional Information <b>1) E2 Contact ENPRO Services, Inc. Lebanon (NH) 946-1102</b>							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and all applicable state laws and regulations.							
Printed/Typed Name <b>William Wilcox Agent for</b>				Signature <b>W Wilcox</b>		Month Day Year <b>06 25 09</b>	
17. Transporter 1 Acknowledgement of Receipt of Materials							
Printed/Typed Name <b>Valdovinos Esteve</b>				Signature <b>[Signature]</b>		Month Day Year <b>06 25 09</b>	
18. Transporter 2 Acknowledgement of Receipt of Materials							
Printed/Typed Name				Signature		Month Day Year	
19. Discrepancy Indication Space <b>4.58 tons</b>							
20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.							
Printed/Typed Name <b>Chris Alcega</b>				Signature <b>[Signature]</b>		Month Day Year <b>06 25 09</b>	

T/S/D/F COPY

www.enpro.com

NHZ001 11872

# INSTRUCTIONS

**IMPORTANT: READ ALL INSTRUCTIONS BEFORE COMPLETING THIS FORM ALL 5 COPIES MUST BE TOTALLY LEGIBLE**

## COPY DISTRIBUTION

- COPY 1: DESTINATION STATE COMPLETED COPY:** Mailed by HWF: This original starts with the shipment from generation to completion by the HWF. When the manifest is completed the HWF must mail this copy to the State where his facility is located.
- COPY 2: GENERATOR STATE COMPLETED COPY:** Mailed by HWF: When the HWF has completed his section of the manifest, he mails this copy to the State where the waste was generated.
- COPY 3: GENERATOR COMPLETED COPY:** Mailed by HWF: When the HWF has completed his section of the manifest, he mails this copy back to the Generator of the waste, who must retain it on site for his records.
- COPY 4: HWF COPY:** Retained by HWF: When the HWF has completed his portion of the manifest, he keeps this copy for his records.
- COPY 5: TRANSPORTER:** Retained by the Transporter: When the transporter has completed his section of the manifest, and transfers the waste to the HWF, he keeps this copy for his records.

## GENERATOR SECTION

- Item 1: **GENERATOR US EPA ID NO-MANIFEST DOCUMENT NO.** — Enter the US EPA 12 digit identification number. Then enter a UNIQUE 5 digit number you assign to this manifest. Use of serially increasing numbers (eg. 00001, 00002 etc.) is recommended.
- Item 2: **Page 1 OF —** Enter the total number of pages used to complete this manifest, i.e., the first form plus the number of Continuation Sheets, if any.
- Item A: **MANIFEST DOCUMENT NUMBER** — Preprinted number.
- Item 3: **GENERATOR'S NAME AND MAILING ADDRESS** — Enter the name (as notified to EPA) & mailing address of the Generator.
- Item 4: **GENERATOR'S PHONE NUMBER** — Enter a telephone number with the area code where an authorized agent of the Generator can be reached in an emergency.
- Item B: **STATE GENERATOR'S ID (S.G.I.)** — The State Generator ID is the STREET ADDRESS of the Generator's pick-up location. If the mailing address and the street address are the same, enter "same" in this block.
- Item 5: **TRANSPORTER 1 COMPANY NAME** — Enter the company name (as notified by EPA) of the first transporter who will transport the waste.
- Item 6: **US EPA ID NUMBER** — Enter the U.S. EPA ID 12 digit identification number of the first transporter identified in Item 5.
- Item C: **STATE TRANSPORTER'S ID (S.T.I.)** — Enter the State of registration & the license plate number of the waste-carrying portion of the vehicle being used to transport the waste.
- Item D: **TRANSPORTER'S PHONE** — Enter a telephone number with area code where an authorized agent of the transporter can be contacted.
- Item 7: **TRANSPORTER 2 COMPANY NAME** — If applicable, enter the company name (as notified to EPA) of the 2nd transporter who will transport the waste. If more than 2 transporters will be used, use a Maine Manifest Continuation Sheet & list the transporters in the order they will be transporting the waste.
- Item 8: **US EPA ID NUMBER** — If applicable, the U.S. EPA 12 digit identification number of the 2nd transporter identified in item 7.
- Item E: **STATE TRAN ID (S.T.I.)** — If applicable, enter the 2nd transporter's State of registration & license plate number for the waste-carrying portion of the vehicle being used to make the pick-up.
- Item F: **TRANSPORTER'S PHONE** — If applicable, enter the 2nd transporter's telephone number with area code where an authorized agent of the transporter can be contacted.
- Item 9: **DESIGNATED FACILITY NAME & SITE ADDRESS** — Enter the company name (as notified to EPA) of the HWF designated to receive the waste listed on this manifest. The address must be the site address, which may differ from the mailing address.
- Item 10: **US EPA ID NUMBER** — Enter the U.S. EPA 12 digit identification number of the designated HWF identified in Item 9.
- Item G: **STATE FACILITY'S ID** — Enter mailing address if different from site address.
- Item H: **FACILITY PHONE** — Enter a telephone number with area code for the HWF designated to receive the waste listed on the manifest.
- Item 11: **US DOT DESCRIPTION** — ALL of the following information must be entered: The correct US DOT (Dept. of Transportation) name for the waste as identified in 49 CFR Parts 171-177 (usually found in Column 2 of Section 172.101), the assigned DOT Hazard Class (usually in Column 3) & the 4 digit UN/NA ID Number (Column 3A) (Example: Waste Acetone, flammable liquid, UN-1090).
- Item 12: **CONTAINERS (NO & TYPE)** — Enter the number of containers for each waste and the appropriate abbreviations from TABLE 1 (below) for the type of container used.

**TABLE 1 — CONTAINER TYPE**

DM = Metal Drums, barrels, kegs	TP = Tanks, portable	CM = Metal boxes, cartons, cases (incl. roll-offs)
DW = Wooden drums, barrels, kegs	TT = Cargo Tanks (tank trucks)	CW = Wooden boxes, cartons, cases
DF = Fiberboard or plastic drums, barrels, kegs	TC = Tank Cars	CF = Fiber or plastic boxes, cartons, cases
CY = Cylinders	DT = Dump Trucks	BA = Burlap cloth, paper/plastic bags

- Item 13: **TOTAL QUANTITY** — Enter the total quantity of waste described on each line relative to the units used in ITEM 14.
- Item 14: **UNIT (Wt./Vol.)** — Enter the appropriate abbreviation from Table II (below) for the unit of measure used in determining the total quantity of waste described on each line. DO NOT use fractions.

**TABLE II — UNITS OF MEASURE**

G = Gallons (liquids only)	L = Liter (liquids only)	Y = Cubic Yards
P = Pounds	K = Kilograms	N = Cubic Meters
T = Tons	M = Metric Tons (1 000 kg)	

- Item I: **NO.** — Enter the 2 digit State waste code. If both the Destination and Generator States have assigned codes, use the Destination State code. If there is no EPA/State code, enter "NONE" - Do NOT leave blank.)
- Item J: **ADDITIONAL DESCRIPTIONS FOR MATERIALS LISTED ABOVE** — Enter description (chemical names, constituent percentages, etc.) for any waste which has a US DOT shipping name ending in N.O.S. If you entered a STATE-DESIGNATED WASTE CODE in item I, provide description or note any EPA Hazard Codes: Ignitable (I), Corrosive (C), Reactive (R), EP Toxic (E), Acute Hazardous (H), Toxic (T). Enter specific gravity if other than 1.0 and physical state of waste. Any additional desired waste description may be entered here.
- Item 15: **SPECIAL HANDLING INSTRUCTIONS & ADDITIONAL INFORMATION** — Use this space to indicate special transportation; treatment, storage or disposal or Bill of Lading information. If an alternate facility is designated, note it here. For INTERNATIONAL SHIPMENTS, the Generator must enter here the point of departure from the U.S. through which the waste must travel before entering a foreign country (City & State). This space may also be used for emergency response numbers, and other information the Generator wishes to include about the shipment.
- Item K: **HANDLING CODES** — HWF completes this section—see "Designated Facility Section" - (below).
- Item 16: **GENERATORS CERTIFICATION** — The Generator must read, sign (by hand) & date the certification (with date of transfer to transporter). If a mode other than highway is used, the word "highway" should be lined out & the appropriate mode (rail, water or air) inserted in the space below. If another mode in addition to the highway mode is used, enter the appropriate mode (e.g. "and rail") in the space below.

## TRANSPORTER SECTION

- Item 17: **TRANSPORTER 1 ACKNOWLEDGEMENT** — Print or type the name of the person accepting the waste on behalf of the 1st transporter. That person must acknowledge acceptance of the waste described on the manifest by signing & entering the date of receipt.
- Item 18: **TRANSPORTER 2 ACKNOWLEDGEMENT** — If applicable, follow instructions for Item 17 for Transporter 2.

## DESIGNATED FACILITY (HWF) SECTION

- Item K: **HANDLING CODES (HWF COMPLETES)** — Enter the final Handling Code as described in 40 CFR 264 Appendix I, Table 2 for each waste listed in Item 11. For example, DB1-Landfill or T07-Rotary Kilo Incinerator.
- Item 19: **DISCREPANCY INDICATION SPACE** — The authorized representative of the designated facility's owner or operator must note in this space any significant discrepancy between the waste described on the manifest & the waste actually received at the facility. Any rejected materials should be listed here, along with an indication of the disposition of the rejected materials.
- Item 20: **FACILITY OWNER OR OPERATOR CERTIFICATION** — Print or type the name of the person accepting the waste on behalf of the owner or operator of the designated HWF. That person must acknowledge acceptance of the waste described on the manifest by signing (by hand) & entering the date of receipt. The signature of the authorized HWF agent indicates acceptance (except for items specified in Item 14) & agreement with the statements on this manifest.

**NOTE: FOR INTERSTATE SHIPMENTS (between different states) YOU MAY BE REQUIRED TO COMPLY WITH THE MANIFESTING REQUIREMENTS OF BOTH THE DESTINATION & GENERATOR STATES REGARDING THE COMPLETION OF SPECIFIC INFORMATION INCLUDED IN LETTERED ITEMS A-L.** You may wish to contact State agencies for more information on this subject.

**REMINDER: ALL 5 COPIES OF THIS FORM MUST BE LEGIBLE**

ESMT of N.H.  
67 International Drive

(603) 783-0228

Ticket No : 253198  
Date : 8/25/2009

London, NH 03307

Max. Acceptable Soil: 200.00

Customer: ENP40  
Enpro Services  
54 Avenue D

Job No : 6840  
Benmont Mill Property  
160 Benmont Ave.  
Bennington VT  
Running Tonnage: 4.58

Williston, VT 05495

Trucker:  
ENPR907 Enpro #907F

Gross : 24540 Scale 1 In 2:24:33PM  
Tare : 25280 STORED Out

Net : 9160 lb  
4.580

W002 HYDRAULIC OIL

Weigh Master: ANGELA

Material \$  
Delivery \$  
Misc \$  
Tax \$

Driver:

Remarks: Thank You For Your Business

Total \$

# **ENPRO Services, Inc.**

<b>NON HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. <b>VT A010101133181</b>		Manifest Document No.		2. Page 1 of 1	
		3. Generator's Name and Mailing Address <b>Benmont Mill Paper Mills, Inc. 160 Benmont Ave Bennington, VT, 05201</b>		A. Non-Hazardous Manifest Document Number <b>NHZ001 11882</b>		B. S.G.I. (Gen. Site Address) <b>5Ams</b>	
4. Generator's Phone (802) <b>253-1203</b>		5. Transporter 1 Company Name <b>Vermont Hauling</b>		6. US EPA ID Number		C. S.T.I. (Lic. Plate #)	
7. Transporter 2 Company Name		8. US EPA ID Number		9. Designated Facility Name and Site Address <b>Moretown Landfill, Inc. 187 Palisades Park Watkins, VT 05676</b>		D. Transporter's Phone <b>802-244-1100 x1206</b>	
		10. US EPA ID Number		E. S.T.I. (Lic. Plate #)		F. Transporter's Phone	
				G. State Facility's ID <b>187 Palisades Park Watkins VT 05676</b>		H. Facility's Phone <b>802-244-1100 x226</b>	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers		13. Total Quantity	
				No. Type		Unit	
a. <b>NON-RCRA, Non-Dot Construction + Demo Debris</b>				1		2 T	
J. Additional Descriptions for Materials Listed Above				K. Handling Codes for Wastes Listed Above			
a. <b>(5) C+D Debris</b>				a. Interim Final Interim Final			
b.				b.			
c.				c.			
d.				d.			
15. Special Handling Instructions and Additional Information							
Point of Departure:							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and all applicable state laws and regulations.							
Printed/Typed Name <b>Wm. Wilcox Agent Est</b>				Signature <b>Wm Wilcox</b>		Month Day Year <b>10/7/15/09</b>	
17. Transporter 1 Acknowledgement of Receipt of Materials				Signature <b>Edward W Myers</b>		Month Day Year <b>10/7/15/09</b>	
Printed/Typed Name <b>Edward W Myers</b>				Signature		Month Day Year	
18. Transporter 2 Acknowledgement of Receipt of Materials				Signature		Month Day Year	
Printed/Typed Name				Signature		Month Day Year	
19. Discrepancy Indication Space							
20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.							
Printed/Typed Name				Signature		Month Day Year	

ORIGINAL-RETURN TO GENERATOR

www.enpro.com

NHZ001 11882





<b>NON HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. <u>VT P 010 010 133 3381</u>		Manifest Document No. <u>1</u>		2. Page 1 of <u>1</u>	
3. Generator's Name and Mailing Address <u>Bennett Mill Properties, Inc.</u> <u>160 Bennett Ave</u> <u>Benniston, VT, 05201</u>				A. Non-Hazardous Manifest Document Number <b>NHZ001 11882</b>			
4. Generator's Phone <u>802 253-1203</u>				B. SGI (Gen. Site Address) <u>Same</u>			
5. Transporter 1 Company Name <u>Ukrainian Hauling</u>		6. US EPA ID Number		C. S.T.I. (Lic. Plate #)		D. Transporter's Phone <u>802 244 1100 x 1206</u>	
7. Transporter 2 Company Name		8. US EPA ID Number		E. S.T.I. (Lic. Plate #)		F. Transporter's Phone	
9. Designated Facility Name and Site Address <u>Moretown Landfill, Inc.</u> <u>187 Palisades Park</u> <u>Wakarusa, VT 05676</u>				G. State Facility's ID <u>187 Palisades Park</u> <u>Wakarusa, VT 05676</u>			
				H. Facility's Phone <u>802 244 1100 x 226</u>			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers		13. Total Quantity	
a. <u>Non-RCRA, Non-Dot (Construction + Demo Debris)</u>				No. Type		14. Unit Wt/Vol	
				1 6M		2 T	
b.						State <u>None</u>	
c.						State <u>None</u>	
d.						State <u>None</u>	
J. Additional Descriptions for Materials Listed Above				K. Handling Codes for Wastes Listed Above			
a. <u>(S) C+D - Debris</u>				Interim Final Interim Final			
b.				a. b. c. d.			
c.				c. d.			
15. Special Handling Instructions and Additional Information							
Point of Departure:							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and all applicable state laws and regulations.							
Printed/Typed Name <u>Wm. Wilcox Agent For</u>				Signature <u>Wm Wilcox</u>		Month Day Year <u>07/15/09</u>	
17. Transporter 1 Acknowledgement of Receipt of Materials							
Printed/Typed Name <u>Edward W Myers</u>				Signature <u>Edward W Myers</u>		Month Day Year <u>07/15/09</u>	
18. Transporter 2 Acknowledgement of Receipt of Materials							
Printed/Typed Name				Signature		Month Day Year	
19. Discrepancy Indication Space							
20. Facility Owner or Operator Certification of receipt of waste materials covered by this manifest except as noted in Item 19							
Printed/Typed Name <u>Thos. Moretown Landfill</u>				Signature <u>Thos. Moretown</u>		Date <u>07/17/09</u>	

www.enpro.com

NHZ001 11882

ORIGINAL-RETURN TO GENERATOR

Moretown Landfill, Inc.  
Interstate Waste Services



19 Kaiser Drive  
Waterbury, VT 05676- PH: (802) 244-1100 FAX: (802) 244-5133

Ticket: 215-10030281

Date: 7/17/2009

Time: 08:06:15 - 08:19:43

Scale

Gross:	36760 lb	In	Scale 1
Tare:	34380 lb	Out	Scale 1
Net:	2380 lb		

Truck: 38D05  
Customer: 2150001178  
ENPRO SERVICES, INC.  
12 MULLIKEN WAY  
NEWBURYPORT, MA 01950-

Grid: 003215/CELL #3

Comment:

Origin	Materials & Services	Quantity	Unit
BENNINGTON	HAUL CHARGE	1.00	each
BENNINGTON	100% of SPECIAL WASTE	1.19	ton

The undersigned hereby certifies that the origin of the waste set forth in this weight ticket is true and accurate, and is non-hazardous materials

Driver:

Deputy Weighmaster: TOM FRENCH



FORM 2

WASTE ID # \_\_\_\_\_

**Interstate Waste Services  
INDUSTRIAL WASTE QUESTIONNAIRE**

MORETOWN LANDFILL

(Please photocopy this form for more than one waste or generating location.)  
PROVIDED BY CSR – CHECKED AND VERIFIED BY WEIGHMASTER

North East Waste Services, Inc. considers it important to closely monitor the waste it receives at its landfills to ensure compliance with current regulatory requirements and minimize future liability concerns. To ensure that only approved wastes are brought to our landfills, we request that the following questionnaire be completed and returned.

**I GENERAL**

1. Generator's Name: Benmont Mill Properties, Inc.  
Generator's Address: 160 Benmont Avenue
2. Bennington, VT 05201
3. Address of facility generating waste: SAME
4. Phone No. ( 802 ) 753-1203 Contact: Jon Goodrich
5. Plant or waste site location: SAME
6. Generator's SIC Code(s): \_\_\_\_\_
7. Process generating waste? Briefly describe process-generating waste. Demolition of wooden walls, concrete wall excess and removal of dry empty paint cans.

**HAZARDOUS WASTE POLICY:** This site does not accept hazardous waste as defined by the state EPA and/or the USLEPA or liquid wastes, paints, solvents, drums, sewage sludge, volatile or reactive materials, or PCB-containing materials. We reserve the right to inspect and reject any waste load partially or in full. Any waste deposited in the landfill that is not clearly labeled as non-hazardous or that is otherwise prohibited will be reloaded on to the customer's truck for removal. If any deposited wastes are found to be hazardous or not acceptable as defined above, the customer shall be liable for any resulting penalties or damages assessed against the landfill. And any and all costs associated with removal of such wastes, remediation of the landfill, monitoring of the landfill or other costs associated with or arising from such waste being sent to the landfill.

**WASTE ACCEPTANCE POLICY:** Waste acceptance at the landfill is based upon the representations of the generator and the waste analysis. If the generator's process has changed or any other physical or chemical changes in the waste occur, a "Special Waste Recertification" form must be submitted by the generator to North East Waste Services, Inc. to determine if additional chemical analyses or evaluation is required.

**II WASTE INFORMATION**

1. Waste's common name? Construction Debris
2. Description of waste: Wood, Nails, Concrete, Plastic, Cinder Blocks, and Empty Paint Cans with Lids Removed
- 2a. Will the waste always appear the same: Color N/A, Density N/A, Odor N/A?
- 2b. Color: Wood – Debris Please supply a color photograph of a representative waste sample. If the waste color is variable, please submit more than one color photo showing the various colors.

3. What is the physical state of waste (at 70°F)? \_\_\_\_\_ Powder, \_\_\_\_\_ Solid, 100%  
Semisolid (sludge), \_\_\_\_\_
4. Waste texture: Granular \_\_\_\_\_, Sandy \_\_\_\_\_, Metal Flakes \_\_\_\_\_, Variable X  
Describe if Variable: Wood, Concrete, Cinder Blocks, Empty Paint Cans
5. What is the minimum % solids of waste? 100% Solids
6. Does the waste contain any freestanding liquids? NO
7. How is the waste currently being disposed? X bulk, \_\_\_\_\_ drums, \_\_\_\_\_ other
8. Is there any odor to waste when wet? NO Dry? NO Is it strong? \_\_\_\_\_ Mild? \_\_\_\_\_
9. What is the density of waste? (range) Solid \_\_\_\_\_
10. Quantity of waste to be disposed:
- 10a. \_\_\_\_\_ total tons; \_\_\_\_\_ maximum tons/day, or,
- 10b. 30 total cubic yards; \_\_\_\_\_ maximum cy/day
11. Has the waste been characterized as hazardous? NO
12. If yes, what characteristics caused the waste to be classified as hazardous?

13. List the major organic or inorganic components of the waste by chemical name. Material Safety Data Sheets may also be included. List each major component as a percent of the total composition by weight. If the waste is the result of more than one process, please complete additional questionnaires for each stream

#### WASTE #1 - Chemical Compounds or Elements

- |    |   |           |             |
|----|---|-----------|-------------|
| 1. | <u>Wood</u>                                 | <u>90</u> | % by weight |
| 2. | <u>Cinder Blocks</u>                        | <u>5</u>  | % by weight |
| 3. | <u>Plastic</u>                              | <u>3</u>  | % by weight |
| 4. | <u>Misc (nails, empty paint cans, etc.)</u> | <u>2</u>  | % by weight |

(Use additional sheet if required)

TOTAL 100%

14. Does this waste contain polychlorinated biphenyl's (PCB's)? Yes/No NO Asbestos? NO  
Dioxin? NO
15. Please complete Attachment A, Chemical Analysis and TCLP (toxicity Characteristic Leaching Procedure).
- 15a. List any protective equipment required by the generator, at his facility, for handling this waste, i.e. respirator, gloves, etc. Standard PPE - Gloves, Hard Hat, Steel Toe Boots, Eye Protection, and Long Sleeve Shirts.

### III

#### HANDLING INFORMATION

1. Transporter name: TAM
2. Transporter address: 639 North Road - Shaftsbury, VT 05262
3. Phone no. ( 802 ) 447-1300 I.D. no. (if applicable) USDQT925409

I hereby certify that the waste identified above does not contain or has not come into contact with any hazardous waste listed in 40 CFR Section 261.30 - 261.33 and is non-hazardous according to 40 CFR 261.1 - 261.20.

The undersigned states that he/she is a duly authorized representative of the generator and that the information and statements included on the questionnaire are true and correct to the best of his/her knowledge.

Signature: W Wilcox Agent for

Title of Generator: Principal Geologist

Print/Type Name: William Wilcox

Company Name: Wilcox & Benton, Inc

Phone No. (802) 496-4747

Please return this form to:

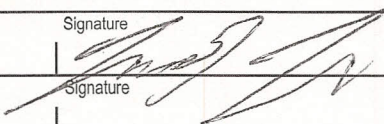
Moretown Landfill, Inc.  
19 Kaiser Drive  
Waterbury, VT 05676

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number <b>V T P 0 0 0 0 1 3 3 3 8</b>		2. Page 1 of <b>1</b>	3. Emergency Response Phone <b>800 966-1102</b>		4. Manifest Tracking Number <b>000874776 GBF</b>		
5. Generator's Name and Mailing Address <b>Benmont Mill Properties, Inc. 160 Benmont Avenue Bennington VT 05201</b>					Generator's Site Address (if different than mailing address) <b>Att: Jon Goodrick</b>				
Generator's Phone: <b>8 0 2 7 5 3 . 1 2 0 3</b>									
6. Transporter 1 Company Name <b>ENPRO SERVICES, INC.</b>					U.S. EPA ID Number <b>M A D 9 8 0 6 7 0 0 0 4</b>				
7. Transporter 2 Company Name					U.S. EPA ID Number				
8. Designated Facility Name and Site Address <b>ENPRO Services of Vermont, Inc. 54 Avenue D Williston VT 05495</b>					U.S. EPA ID Number <b>V T R 0 0 0 5 1 7 0 5 2</b>				
Facility's Phone: <b>802 860-1200</b>									
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))			10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
					No.	Type			
	<b>X</b>	<b>1. Non-RCRA, non-DOT</b>			<b>8</b>	<b>DM</b>	<b>400</b>	<b>G</b>	<b>VT02</b>
		<b>2.</b>							
		<b>3.</b>							
		<b>4.</b>							
14. Special Handling Instructions (Place Additional Information Here) <b>(X) No Fuel oil sudge, WPR 23726, VT-0609-0</b>									
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.									
Generator's/Offor's Printed/Typed Name <b>William Wilcox Agent for</b>					Signature <b>W. Wilcox</b>		Month Day Year <b>06 17 09</b>		
INT'L	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Transporter signature (for exports only): _____ Date leaving U.S.: _____								
	17. Transporter Acknowledgment of Receipt of Materials								
TRANSPORTER	Transporter 1 Printed/Typed Name <b>Timothy Thompson</b>					Signature <b>[Signature]</b>		Month Day Year <b>6 17 09</b>	
	Transporter 2 Printed/Typed Name					Signature		Month Day Year	
DESIGNATED FACILITY	18. Discrepancy								
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection								
	Manifest Reference Number:								
	18b. Alternate Facility (or Generator) U.S. EPA ID Number								
	Facility's Phone:								
	18c. Signature of Alternate Facility (or Generator) Month Day Year								
	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)								
	1. <b>H141</b>		2.		3.		4.		
	20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a								
	Printed/Typed Name <b>Jeffrey A. Baker</b>					Signature <b>[Signature]</b>		Month Day Year <b>06 09 09</b>	

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

**DESIGNATED FACILITY'S COPY**



<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number <b>UTD988375580</b>		2. Page 1 of <b>1</b>		3. Emergency Response Phone <b>800-966-1102</b>		4. Manifest Tracking Number <b>000874798 GBF</b>			
		5. Generator's Name and Mailing Address <b>MAE Security International, Inc.</b> <b>160 Benmont Ave.</b> <b>Bennington, VT 05201</b> Generator's Phone: <b>802-447-1503</b>		Generator's Site Address (if different than mailing address)							
6. Transporter 1 Company Name <b>ENPRO Services, Inc.</b>		U.S. EPA ID Number <b>MAAD980670004</b>									
7. Transporter 2 Company Name		U.S. EPA ID Number									
8. Designated Facility Name and Site Address <b>ENPRO Services of Vermont, Inc.</b> <b>54 Avenue D</b> <b>Williston, VT 05495</b> Facility's Phone: <b>802-860-1200</b>		U.S. EPA ID Number <b>UTR000517052</b>									
<b>GENERATOR</b>	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))				10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
						No.	Type				
	X	1. RQ, UN3288, waste brk solid, inorganic, N.O.S. (lead, chloroacetylphenone), 6.1, P011 (CRQ:0008)				1	DF	9.5	P	D008	
	X	2. UN3448, tear gas substance, solid, N.O.S. (chloroacetylphenone), 6.1, P011				12	CF	2003	P	V199	
		3.									
		4.									
14. Special Handling Instructions and Additional Information <b>D(CSE) lead pink chips ERG#151</b> <b>D(CS) trace tear gas contaminated debris, WIP#23707, VT-C609-ERG#159</b>											
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.											
Generator's/Offor's Printed/Typed Name <b>William Wilcox Agent for</b>						Signature <b>W Wilcox</b>		Month <b>06</b>		Day <b>25</b>	
								Year <b>09</b>			
<b>INT'L</b>	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____										
	Transporter signature (for exports only): _____										
<b>TRANSPORTER</b>	17. Transporter Acknowledgment of Receipt of Materials										
	Transporter 1 Printed/Typed Name <b>Timothy Thompson</b>						Signature 		Month <b>06</b>		Day <b>25</b>
								Year <b>09</b>			
<b>DESIGNATED FACILITY</b>	18. Discrepancy										
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection										
	Manifest Reference Number: _____										
	18b. Alternate Facility (or Generator) U.S. EPA ID Number _____										
	Facility's Phone: _____										
18c. Signature of Alternate Facility (or Generator) _____ Month _____ Day _____ Year _____											
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)											
1. <b>H141</b>		2.		3.		4.					
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a											
Printed/Typed Name _____						Signature _____		Month _____		Day _____	
								Year _____			

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number <b>UTD9883755EC</b>		2. Page 1 of <b>1</b>		3. Emergency Response Phone <b>800-966-1102</b>		4. Manifest Tracking Number <b>000874798 GBF</b>			
		5. Generator's Name and Mailing Address <b>MALE SECURITY INTERNATIONAL, INC.</b> <b>160 RICHMONT AVE.</b> <b>PORTLAND, UT 84050</b>		Generator's Site Address (if different than mailing address)							
6. Transporter 1 Company Name <b>ENPRO SERVICES, INC.</b>		U.S. EPA ID Number <b>MA0980670004</b>									
7. Transporter 2 Company Name		U.S. EPA ID Number									
8. Designated Facility Name and Site Address <b>ENPRO SERVICES OF UTAH, INC.</b> <b>541 AVENUE D</b> <b>WILLISDALE, UT 84405</b>		U.S. EPA ID Number <b>UTR000517052</b>									
9a. HM		9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		10. Containers		11. Total Quantity		12. Unit Wt./Vol.		13. Waste Codes	
				No. Type							
X		1. RQ UN3288, waste brk shd, inorganic, acid, chd, chlorides (phenolic), 6.1, PBT (RQ 2005)		1		0.5		P		2005	
X		2. UN3449, waste brk shd, inorganic, acid, chd, chlorides (phenolic), 6.1, PBT		12		2003		P		2003	
		3.									
		4.									
14. Special Handling Instructions and Additional Information <b>10 (SE) low amt chd, ERG 151</b>											
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.											
Generator's/Offeror's Printed/Typed Name <b>William Wilcox Agent for</b>				Signature <b>W Wilcox</b>				Month Day Year <b>06 25 09</b>			
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____											
17. Transporter Acknowledgment of Receipt of Materials											
Transporter 1 Printed/Typed Name <b>Timothy Thompson</b>				Signature <b>[Signature]</b>				Month Day Year <b>06 25 09</b>			
Transporter 2 Printed/Typed Name				Signature				Month Day Year			
18. Discrepancy											
18a. Discrepancy Indication Space <input checked="" type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection											
<b>Section 11(1) should read 9</b>											
18b. Alternate Facility (or Generator) Manifest Reference Number: _____ U.S. EPA ID Number: _____											
Facility's Phone: _____											
18c. Signature of Alternate Facility (or Generator) _____ Month Day Year _____											
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)											
1. <b>H141</b>		2. <b>H141</b>		3.		4.					
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a											
Printed/Typed Name <b>Jeffrey A. Baker</b>				Signature <b>[Signature]</b>				Month Day Year <b>06 26 09</b>			

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number <b>V T P 0 0 0 0 1 3 3 3 8</b>		2. Page 1 of 3 <b>1 2</b>		Emergency Response Phone <b>800 966-1102</b>		4. Manifest Tracking Number <b>001030604 GBF</b>					
		5. Generator's Name and Mailing Address <b>Benmont Mill Properties, Inc. 160 Benmont Avenue Bennington VT 05201</b>		Att: Jon Goodrich Generator's Site Address (if different than mailing address)									
Generator's Phone: <b>8 0 2 7 5 3 . 1 2 0 3</b>													
6. Transporter 1 Company Name <b>ENPRO SERVICES, INC.</b>		U.S. EPA ID Number <b>M A D 9 8 0 6 7 0 0 0 4</b>											
7. Transporter 2 Company Name		U.S. EPA ID Number											
8. Designated Facility Name and Site Address <b>ENPRO Services of Vermont, Inc. 54 Avenue D Williston VT 05495</b>		U.S. EPA ID Number <b>V T R 0 0 0 5 1 7 0 5 2</b>											
Facility's Phone: <b>802 860-1200</b>													
<b>GENERATOR</b>	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))			10. Containers No. Type		11. Total Quantity	12. Unit WL/Vol.	13. Waste Codes				
		1. Non-RCRA, non-DOT (Consolidation Oily Solids)			<b>1</b> DM		<b>70</b>	P	VT02				
	<b>X</b>	2. NA3082, Hazardous waste, liquid, n.o.s. (Lead) 9, PGIII			<b>1</b> DM		<b>70</b>	P	D008				
	<b>X</b>	3. NA1993, Combustible liquid, n.o.s. (Petroleum Distillates) Combustible Liquid, PGIII			<b>1</b> DF		<b>7</b>	P	VT02				
		4. Non-RCRA, non-DOT (Empty Drums/Pails)			<b>4</b> DM		<b>278</b>	P	VT99				
14. Special Handling Instructions and Additional Information <b>1)(S) WIP# 23756, VT-0709- 2)(L,E) Consolidated oil, WIP# 23745, VT-0609-0 ERG#171 3)(L) unknown oil, WIP# 23800, VT-0709-0 ERG#128 4)(S) Empty Drums/Pails, WIP# 23755, VT-0609-0</b> <b>JOB# 9318-09</b>													
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.													
Generator's/Offor's Printed/Typed Name: <b>Wm. Wilcox</b> Signature: <b>Wm. Wilcox</b> Month: <b>07</b> Day: <b>15</b> Year: <b>09</b>													
<b>INT'L</b>	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:												
	17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name: <b>Timothy Thompson</b> Signature: <b>Timothy Thompson</b> Month: <b>07</b> Day: <b>15</b> Year: <b>09</b> Transporter 2 Printed/Typed Name: Signature: Month: Day: Year:												
<b>TRANSPORTER</b>	18. Discrepancy												
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection												
	18b. Alternate Facility (or Generator) Manifest Reference Number: U.S. EPA ID Number												
	18c. Signature of Alternate Facility (or Generator) Month: Day: Year:												
	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)												
<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:25%;">1. <b>H141</b></td> <td style="width:25%;">2. <b>H141</b></td> <td style="width:25%;">3. <b>H141</b></td> <td style="width:25%;">4. <b>H141</b></td> </tr> </table>										1. <b>H141</b>	2. <b>H141</b>	3. <b>H141</b>	4. <b>H141</b>
1. <b>H141</b>	2. <b>H141</b>	3. <b>H141</b>	4. <b>H141</b>										
<b>DESIGNATED FACILITY</b>	20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a												
	Printed/Typed Name: <b>Jeffrey A Baker</b> Signature: <b>Jeffrey A Baker</b> Month: <b>07</b> Day: <b>15</b> Year: <b>09</b>												





3 Barker Drive • Wallingford, CT 06492  
(203) 269-8300 • Fax: (203) 269-8600

CT, MA, RI, VT, NH, ME  
GENERATORS

EPA New England  
1 Congress Street  
Boston, MA 02114-2023  
(617) 918-1111

## E.P.A. AGENCY

NY GENERATORS

EPA Region 2  
290 Broadway, 26th Floor  
New York, NY 10007-1866  
(212) 637-3000

#144503

EMERGENCY RESPONSE  
TELEPHONE  
#1-800-750-3460

### TK# ASBESTOS DISPOSAL & DOCUMENTATION FORM

Job Number 09VT002/5090810 P.O. # \_\_\_\_\_  
Contractor Alderson, Inc.  
Address 2142 Pine St.  
City Dartington State VT Zip 05401  
Telephone Number 802-660-8899  
Date Container Del. \_\_\_\_\_ Date of Pickup \_\_\_\_\_  
Type of Container Trailer  
**VOLUME** 6 **CY** Friable ☒ Non-Friable ☒  
MUST BE IN CUBIC YARDS  
Bag ☒ 118 Drum ☐ Wrapped ☐ Other ☐  
**RQ, ASBESTOS, 9, NA2212, PG III**

#### GENERATOR/BUILDING OWNER

Vermont Mill Properties  
Address 1100 Benmont Ave.  
City Dartington, VT State \_\_\_\_\_ Zip 05201  
Phone Number 802-447-1503

#### GENERATING LOCATION

Yace Plant  
Address 1100 Benmont Ave.  
City Dartington, VT State \_\_\_\_\_ Zip 05201  
Phone Number \_\_\_\_\_

I certify the above named material does not contain free liquid as defined by 40 CFR part 260.10 or any applicable state law, is not a hazardous waste as defined by 40 CFR part 26 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to NESHAP standards for asbestos waste disposal found in 40 CFR part 61.150.

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

**AUTHORIZED SIGNATURE** Chloe Catelet

**Transporter 1:** Alderson 2142 Pine St Dartington, VT 05401 802-660-8899  
Name Address Telephone #

Driver: Chloe Catelet Registration #: BHR841 / VT Date: 6-5-9  
Signature State / #  
Acknowledgement of receipt of materials.

**Transporter 2:** TransWaste, Inc., 3 Barker Drive, Wallingford, CT 06492 (203) 269-8300

Driver: \_\_\_\_\_ Registration #: \_\_\_\_\_ Date: \_\_\_\_\_  
Signature Acknowledgement of receipt of materials. State / #

**Transporter 3:** TransWaste, Inc., 3 Barker Drive, Wallingford, CT 06492 (203) 269-8300

Name Address Telephone #  
Driver: \_\_\_\_\_ Registration #: \_\_\_\_\_ Date: \_\_\_\_\_  
Signature Acknowledgement of receipt of materials. State / #

Site ☐ **Modern Landfill** Site ☐ **BFI Imperial Landfill** Site ☐ \_\_\_\_\_  
Address: 4400 Mount Pisgah Road Address: 11 Boggs Road Address: \_\_\_\_\_  
York, PA 17402 Imperial, PA 15126  
Phone: 717-246-4615 Phone: 724-695-0900/L15Y75028 Phone: \_\_\_\_\_

Certification of receipt of materials covered by this manifest.

I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.

Name of Authorized Agent

Signature

Receipt Date



3 Barker Drive • Wallingford, CT 06492  
(203) 269-8300 • Fax: (203) 269-8600

CT, MA, RI, VT, NH, ME  
GENERATORS

EPA New England  
1 Congress Street  
Boston, MA 02114-2023  
(617) 918-1111

# E.P.A. AGENCY

NY GENERATORS

EPA Region 2  
290 Broadway, 26th Floor  
New York, NY 10007-1866  
(212) 637-3000

#144509

EMERGENCY RESPONSE  
TELEPHONE  
#1-800-750-3460

## TK# ASBESTOS DISPOSAL & DOCUMENTATION FORM

Job Number 09VT075/5090810 P.O. # \_\_\_\_\_  
Contractor Alderson, Inc.  
Address 2146 Pine St.  
City Dunbarton State VT Zip 05401  
Telephone Number 802-660-8899  
Date Container Del. \_\_\_\_\_ Date of Pickup \_\_\_\_\_  
Type of Container Trailer  
**VOLUME** 2.5 **CY** Friable ☒ Non-Friable ☐  
MUST BE IN CUBIC YARDS 16 - BAGS  
Bag ☒ Drum ☐ Wrapped ☐ Other ☐  
**RQ, ASBESTOS, 9, NA2212, PG III**

### GENERATOR/BUILDING OWNER

Vermont Mill Properties  
Address \_\_\_\_\_  
City 1100 Dunbarton Ave State \_\_\_\_\_ Zip \_\_\_\_\_  
Dunbarton, VT 05201  
Phone Number 802-447-1503

### GENERATING LOCATION

Mill Plant  
Address \_\_\_\_\_  
City 1100 Dunbarton Ave State \_\_\_\_\_ Zip \_\_\_\_\_  
Dunbarton, VT 05201  
Phone Number \_\_\_\_\_

I certify the above named material does not contain free liquid as defined by 40 CFR part 260.10 or any applicable state law, is not a hazardous waste as defined by 40 CFR part 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to NESHAP standards for asbestos waste disposal found in 40 CFR part 61.150.

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

### AUTHORIZED SIGNATURE

[Signature]

Transporter 1: Alderson 2146 Pine St Dunbarton, VT 05401 802-660-8899  
Name Address Telephone #  
Driver: [Signature] Registration #: BCE 825 Date: 6-24-9  
Signature State / #  
Acknowledgement of receipt of materials.

Transporter 2: TransWaste, Inc., 3 Barker Drive, Wallingford, CT 06492 (203) 269-8300

Driver: \_\_\_\_\_ Registration #: \_\_\_\_\_ Date: \_\_\_\_\_  
Signature State / #  
Acknowledgement of receipt of materials.

Transporter 3: TransWaste, Inc., 3 Barker Drive, Wallingford, CT 06492 (203) 269-8300

Name Address Telephone #  
Driver: \_\_\_\_\_ Registration #: \_\_\_\_\_ Date: \_\_\_\_\_  
Signature State / #  
Acknowledgement of receipt of materials.

Site ☐ **Modern Landfill** Site ☐ **BFI Imperial Landfill** Site ☐ \_\_\_\_\_  
Address: 4400 Mount Pisgah Road Address: 11 Boggs Road Address: \_\_\_\_\_  
York, PA 17402 Imperial, PA 15126  
Phone: 717-246-4615 Phone: 724-695-0900/L15Y75028 Phone: \_\_\_\_\_

Certification of receipt of materials covered by this manifest.