



# Wilcox & Barton INC.

ENVIRONMENTAL AND ENGINEERING SERVICES

## **SUMMARY REPORT**

### **ADMINISTRATIVE ORDER ON CONSENT VERMONT MILL PROPERTIES SITE BENNINGTON, VERMONT**

#### **Prepared for:**

Mace Security International, Inc.  
And  
Benmont Mill Properties, Inc.  
160 Benmont Avenue  
Bennington, Vermont 05201

#### **Prepared by:**

Wilcox & Barton, Inc.  
1115 Route 100B, Suite 200  
Moretown, Vermont 05660  
Contact: William R. Wilcox, (802) 496-4747

**October 24, 2008**

**Wilcox & Barton, Inc. Project No.: MACE0005**

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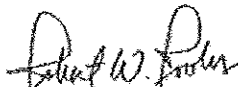
**October 24, 2008**

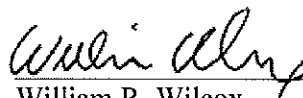
## CERTIFICATION

The following personnel have prepared and/or reviewed this report for accuracy, content, and quality of presentation.

**Document Title:** Summary Report  
Administrative Order on Consent  
Vermont Mill Properties Site  
Bennington, Vermont

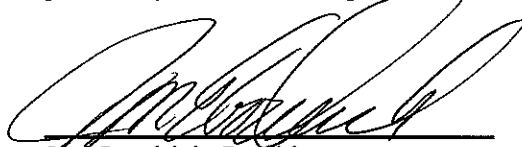
**Date/Version:** October 24, 2008

  
Robert W. Rooks, PE  
Principal Engineer

  
William R. Wilcox  
Principal Geologist  
Project Coordinator

### Respondent Certification – Benmont Mill Properties, Inc.

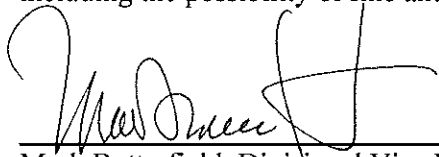
Under penalty of law, I certify that to the best of my knowledge, after appropriate inquiries of all relevant persons involved in the preparation of the report for Benmont Mill Properties, Inc., the information submitted on behalf of Benmont Mill Properties, Inc. is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

  
Jon Goodrich, President  
Benmont Mill Properties, Inc.

10/24/08  
Date

### Respondent Certification – Mace Security International, Inc.

Under penalty of law, I certify that to the best of my knowledge, after appropriate inquiries of all relevant persons involved in the preparation of the report for Mace Security International, Inc., the information submitted on behalf of Mace Security International, Inc. is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

  
Mark Butterfield, Divisional Vice President  
Mace Security International, Inc.

October 24, 2008  
Date

## TABLE OF CONTENTS

<b>1.0</b>	<b>INTRODUCTION.....</b>	<b>1</b>
1.1	Background .....	1
1.2	Property History and Environmental Background.....	1
1.3	Site Description and Location.....	2
1.4	Current Environmental Efforts .....	2
1.5	Action Memorandum .....	3
1.6	Parties and Relationships .....	3
1.7	Costs/Resources .....	4
<b>2.0</b>	<b>INITIAL &amp; SUPPORTING RESPONSE ACTIONS.....</b>	<b>4</b>
2.1	Office/Command Post set up .....	4
2.2	Initial Inventory .....	5
2.3	Safety Planning and Site Control.....	5
2.4	Structural Evaluation and Improvements.....	6
2.5	General Work Plan.....	6
2.6	Status Reports .....	6
<b>3.0</b>	<b>PYROTECHNIC MATERIALS – MACE SECURITY INTERNATIONAL, INC....</b>	<b>7</b>
3.1	Work Planning .....	7
3.2	Summary of Origin and Use .....	7
3.3	Storage Bunker.....	7
3.4	Facility Approval .....	7
<b>4.0</b>	<b>SANDBLAST GRIT/LEAD - BENMONT MILL PROPERTIES, INC.....</b>	<b>8</b>
4.1	Overview and History .....	8
4.2	Approach.....	8
4.3	Work Plan Implementation .....	8
4.3.1	Roll-off Characterization .....	8
4.3.2	Surface Soil Evaluation.....	9
4.3.3	Groundwater Characterization .....	10
4.3.4	Subsurface Soil Evaluation .....	10
4.4	Stockpile Characterization .....	11
4.5	Transportation and Disposal .....	11
4.5.1	Hazardous Soil and Demolition Debris .....	11
4.5.2	Non-Hazardous Soil.....	11
<b>5.0</b>	<b>HAZARDOUS WASTES - MACE SECURITY INTERNATIONAL, INC. AND BENMONT MILL PROPERTIES, INC. ....</b>	<b>11</b>
5.1	Work Planning .....	12
5.2	Inventory and Waste Stream Segregation.....	12
5.3	Sampling and Laboratory Analysis.....	12
5.4	Consolidation and Staging .....	13
5.4.1	Waste Ammunition .....	13
5.4.2	Containerized Waste .....	13
5.5	Waste Profiling and Assignment of Waste Codes .....	14
5.6	Transportation and Disposal .....	14
5.6.1	Waste Ammunition .....	14
5.6.2	Containerized Waste .....	14

**TABLE OF CONTENTS**  
**(continued)**

<b>6.0</b>	<b>BULK CS-1 TEAR GAS AGENT - MACE SECURITY INTERNATIONAL, INC.</b>	<b>14</b>
6.1	Alternatives Evaluation.....	14
6.2	Work Planning .....	15
6.3	Labeling/DOT Certification.....	15
6.4	Facility Approval .....	15
6.5	Transportation and Disposal .....	16
<b>7.0</b>	<b>OTHER ISSUES .....</b>	<b>16</b>
7.1	Storage Tanks - Benmont Mill Properties, Inc. ....	16
7.2	Asbestos Inspection Reports - Benmont Mill Properties, Inc.....	16

**APPENDICES**

Appendix A	Invoices and Cost Records
Appendix B	OSC Status Reports
Appendix C	Manifests & Profiles – Hazardous Soil and Demolition Debris
Appendix D	Manifests & Profiles – Non-Hazardous Soil
Appendix E	Manifests & Profiles – Waste Ammunition
Appendix F	Manifests & Profiles – Hazardous Containerized Waste
Appendix G	Manifests & Profiles – Non-Hazardous Containerized Waste
Appendix H	Manifests & Profiles – Bulk CS-1

## **1.0 INTRODUCTION**

This report provides a 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. (the Respondents.)

Clause 34 of the AOC requires submittal of a Final Report within 60 days after completion of all work required by the Settlement Agreement. The final waste shipments were transported from the site on August 28, 2008. Therefore, this report is due to EPA on or before October 27, 2008.

### **1.1 Background**

On January 8, 2008, the EPA Region I Regional Response Center received a call from a concerned local citizen who reported specific activities conducted by Mace Security International, Inc. (MSI) at 160-180 Benmont Avenue in Bennington, Vermont. The caller stated that MSI 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 (VT DEC), which dispatched a responder, who confirmed the transfer of the material as reported by the caller. 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, VT DEC, and two members from 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.

### **1.2 Property History and Environmental Background**

The mill was erected in 1865 and was used to manufacture wool products and other textiles. Known at the time as the Bennington Woolen Mills, it employed hundreds of people and operated over 100 looms and 12,000 spindles to produce in excess of one-half million yards of heavy overcoating during the late 1800s. The mill also produced material for military uniforms during World War I and, by 1920, employed approximately 800 people.

Several changes in ownership of the textile company ended with the mill closing in 1949. In 1951, Ben-Mont Papers, Inc. purchased a section of the property for the manufacture of waxed and wrapping paper. In 2000, Vermont Mill Properties, Inc. (Vermont Mill Properties) purchased the south wing of the mill and Benmont Mill Properties, Inc. (Benmont Mill Properties) purchased the center section and north wing of the mill. Both Vermont Mill Properties and Benmont Mill Properties are private companies. Benmont Mill Properties acts as Property Manager for the entire facility.

During the mid-1980s through mid-1990s, prior to current ownership, the property was the subject of investigations by EPA and the State of Vermont for environmental conditions related

to Catamount Dyers, which occupied the property from 1971 until its liquidation under bankruptcy in 1984. The site was entered into the Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) on January 1, 1984. Information regarding those investigations is summarized in a *Final Site Investigation Prioritization Report* prepared by CDM Federal Programs Corporation and dated October 31, 1994.

On November 5, 1999, VT DEC issued a *Site Management Activity Completed* letter to the Vermont Economic Development Authority (the owner at the time) indicating that no further work was required with respect to VT DEC Site #77-133. The letter was in response to a *Completion of Remedial Action Report* dated September 10, 1999, by Griffin International describing site characterization and encapsulation of risk-sensitive areas.

### **1.3 Site Description and Location**

The site is located at latitude 42° 53' 5.8" North and longitude 73° 12' 11.2" West. It occupies approximately 12.2 acres, and is located in a mixed residential and commercial use area, with the closest residences located several hundred feet away. The site is bound to the north, south, and east by residential properties and several businesses and to the west by the Walloomsac River, a tributary of the Hoosic River.

The buildings on the property are part of the former Holden-Leonard Mill complex, which is listed on the National Register of Historic Places. According to the EPA Region 1 Environmental Justice Mapping Tool, the site is located in a low income environmental justice area. According to the VT DEC Environmental Interest Locator (online Geographical Information System), the site is not located within a groundwater Source Protection Area.

The former mill has been extensively rehabilitated, and is now used as commercial space for several businesses, including a health club, medical offices, and a social services office. The mill also houses MSI, a public company that manufactures and distributes Mace® and pepper spray products, along with other items sold to consumers, law enforcement agencies, banks, and others in the security and safety business.

### **1.4 Current Environmental Efforts**

During the January 2008 site investigation, EPA reported that MSI was storing “hundreds of containers” of chemicals used in the manufacturing process, stored as inventory, or stored on site as waste material. As reported by EPA, hazardous substances that posed a threat of release included, but were not limited to, the following:

- Containers labeled flammable, toxic, reactive, corrosive, or explosive.
- 2-chlorobenzalmalononitrile (CS tear gas agent).
- Oil and oily material.
- Metals-contaminated soil and debris in bulk roll-off containers.

Some of the drums and containers of waste had reportedly been stored in trailers for several years before being moved into the mill during the week of January 8, 2008. EPA reported the

drums to be in fair to poor condition. EPA also raised concerns about the structural adequacy of the second floor storage spaces of the so-called Cold Storage and 1924 Buildings.

## 1.5 Action Memorandum

An Action Memorandum dated February 20, 2008, and amended February 28, 2008, outlined the justification for a Time-Critical Removal Action at the site. Completion of the proposed actions outlined therein is documented in this report and in prior submittals to EPA by the Respondents and/or their consultants.

## 1.6 Parties and Relationships

The following individuals have been involved in the project as representatives of the indicated organizations and in the roles shown:

Individual	Organization	Role/Scope of Services
<b>Regulatory Agencies and Oversight Personnel</b>		
Catherine Young	US EPA	<b>On-scene Coordinator</b>
Mike Nalipinski	US EPA	Backup OSC
Aaron Benoit	Weston Solutions, Inc.	EPA START Contractor
Christine Dupree	Weston Solutions, Inc.	EPA START Contractor
<b>Respondents</b>		
Mark Butterfield	Mace Security International, Inc.	Divisional Vice President
Bernie Graney	Mace Security International, Inc.	Purchasing Manager
Jon Goodrich	Benmont Mill Properties, Inc.	President
Dan Walton	Benmont Mill Properties, Inc.	Facility Manager
<b>Consultants and Attorneys</b>		
Alan B. George, Esq.		Legal Counsel-Mace Security International, Inc.
Robert Woolmington, Esq.	Witten, et. al, P.C.	Legal Counsel-Benmont Mill Properties, Inc.
William R. Wilcox	Wilcox & Barton, Inc.	<b>Project Coordinator</b>
Robert W. Rooks, PE	Wilcox & Barton, Inc.	Technical Lead
Paul J. Plagge, EIT	Wilcox & Barton, Inc.	Project Engineer
Lawrence F. Mach	Wilcox & Barton, Inc.	Project Scientist
Mike Cashins, CIH	Cashins & Associates, Inc.	Health & Safety Planning / Oversight
Scott Herzog	OccuHealth, Inc.	Process Hazard Analysis (HAZOP), Emergency Evacuation Planning
David MacGregor, PE	Dubois & King, Inc.	Structural Evaluation and Engineering
<b>Contractors</b>		
Cyn Environmental Services, Inc.		Field services, oily waste disposal
Northland Environmental, Inc.		Hazardous waste disposal
Cyn Oil Corporation		Disposal of non-hazardous oily wastes, recycling
Veolia Environmental Services		Tear gas and explosives packaging & handling, disposal
21 <sup>st</sup> Century Environmental Management Inc. of RI		Hazardous waste transportation
SJ Transportation Company		Tear gas transportation
Freehold Cartage, Inc.		Tear gas transportation
Con-Test Analytical Laboratory, Inc.		Laboratory analysis
Expedition Drilling, Inc.		Geoprobe, drilling, and soil sampling services
Waste USA Coventry Landfill		Disposal of non-RCRA, non-DOT soil
Stablex Canada Inc.		Disposal of RCRA hazardous soil and debris
TAM's Transportation		Transportation of non-RCRA, non-DOT soil
New England Disposal Technologies		Transportation of RCRA hazardous soil and debris



## **2.2 Initial Inventory**

From March 17, 2008 through March 25, 2008, a comprehensive inventory of all chemical containers in the MSI-occupied and leased spaces were 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 the Work Plan for management, characterization, packaging, and disposal of hazardous wastes at the facility.

## **2.3 Safety Planning and Site Control**

Cashins & Associates prepared a comprehensive Health & Safety Plan (HASP) that covered all of the activities planned for the removal action. The HASP covered 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 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.

In support of all work that involved opening containers or other potential worker exposures, containments were constructed by Cyn Environmental Services and designated as exclusion zones requiring Level C or better personal protective equipment in accordance with the requirements of the 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.

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.

## **2.4 Structural Evaluation and Improvements**

On March 21, 2008, DuBois & King, Inc. performed a comprehensive structural evaluation of the 2<sup>nd</sup> floors of the Cold Storage and 1924 Buildings. The results of the inspection were presented in a letter report entitled *Mill Storage Buildings Second Floor Evaluation*, dated April 7, 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. As part of the evaluation, cores were advanced through the lower-level concrete floor slabs to determine the thickness of the slab. 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 plates along travel pathways for pallets prior to moving wastes. The recommended structural improvements were completed by Benmont Mill Properties on April 22, 2008, and approved by EPA prior to commencement of work in those spaces. On April 29, 2008, the structural engineer's certification that the improvements were completed in accordance with the plan was submitted to EPA.

## **2.5 General Work Plan**

Wilcox & Barton, Inc. 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 on Consent. The Work Plan was submitted to EPA on March 19, 2008, and was approved with minor comments on April 2, 2008.

The General Work Plan provided an overall concept for completion of the various tasks. Task-specific work plans were later submitted for concurrence, and are discussed in the applicable sections below.

## **2.6 Status Reports**

Status reports were provided weekly or bi-weekly during all periods of active response work at the site. During delays associated with reviews and approvals, the OSC was kept informed by regular communications, though formal status reports were not submitted.

Detailed status reports were completed up to and including May 18, 2008, at which time the only remaining physical task was the loading and transportation of hazardous waste containers. The status reports provide a detailed chronology of the tasks, events, and approvals during the course of the project. Copies are provided in Appendix B.

### **3.0 PYROTECHNIC MATERIALS – MACE SECURITY INTERNATIONAL, INC.**

#### **3.1 Work Planning**

On March 14, 2008, Wilcox & Barton, Inc. 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.

#### **3.2 Summary of Origin and Use**

“Standard Fuel Mix” is a flammable solid that was used as a pyrotechnic in the production of tear gas grenades for use by the military and police departments in riot control applications. This material was manufactured by New England Ordnance, which has ceased operations, and was acquired as existing inventory when MSI acquired Federal Laboratories in 1994. Prior to the removal action, small quantities of the material were used periodically at the facility during manufacture of special order products.

#### **3.3 Storage Bunker**

Technical information concerning the bunker was provided to EPA, and EPA subsequently approved relocation of the materials on March 17, 2008. Immediately following EPA approval, three 30-gallon drums and one 6-gallon container of “Standard Fuel Mix” were moved from inside the facility to the outdoor bunker.

#### **3.4 Facility Approval**

MSI requested approval to sell and ship the 6-gallon and three 30-gallon containers of “Standard Fuel Mix” to Combined Systems, Inc., in Jamestown, Pennsylvania. EPA approved the request on March 26, 2008.

#### **3.5 Disposal**

A total of 308 pounds of “Standard Fuel Mix” was shipped to Combined Systems, Inc. on April 11, 2008. The materials were re-packaged into a single 55-gallon drum to meet DOT packaging requirements. Copies of the shipping papers were submitted to EPA on April 16, 2008.

## **4.0 SANDBLAST GRIT/LEAD - BENMONT MILL PROPERTIES, INC.**

### **4.1 Overview and History**

The mill property is a historic structure that has undergone extensive renovation to reach its current restored state. Portions of the renovation involved removal of paint from interior brick and timber surfaces by sandblasting. Sandblast grit, thought to be Black Beauty, and paint residuals were initially stockpiled in an area outside the building, and subsequently loaded into roll-off containers prior to initiation of the removal action.

The following waste streams were handled under this portion of the removal action:

- Soil and sandblast grit located in roll-off containers
- Soil and sandblast grit remaining on the ground in former stockpile areas
- Lead-contaminated demolition debris generated during ongoing renovation activities while the removal action was underway.

### **4.2 Approach**

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

### **4.3 Work Plan Implementation**

Initial work on this task was initiated on April 7, 2008, under the oversight of EPA and a representative from the EPA START contractor.

#### **4.3.1 Roll-off Characterization**

Composite soil samples were collected from nine roll-off containers on April 7, 2008 and submitted for laboratory analysis. One sample contained a Toxicity Characteristic Leaching Procedure (TCLP) lead concentration of 5.2 milligrams per liter, exceeding the toxicity characteristic threshold. Eight of the roll-off containers were therefore characterized as non-hazardous, and one was characterized as RCRA hazardous. Additional samples were collected for volatiles analysis in order to meet profiling requirements.

Concurrent with the removal actions, Benmont Mill Properties was performing renovation work on an elevator within the Mill Complex, and the demolition debris was placed in a roll-off container. To adequately characterize the construction debris for disposal, samples were collected from the painted demolition debris and analyzed for TCLP lead. The samples failed for

the toxicity characteristic, and the container was therefore characterized as RCRA hazardous for lead. It was determined that the container would be disposed of as hazardous waste along with the single roll-off containing RCRA hazardous soil.

#### 4.3.2 Surface Soil Evaluation

In accordance with the Work Plan, discrete soil samples were collected on a 5-foot grid spacing following removal of the shallow surface layer across the former stockpile areas. After removal of the top 6 inches, it was apparent that not all of the sandblast grit had been removed. Therefore, the sample frequency was modified slightly from that which was presented in the work plan to provide better vertical characterization. At all grid intersections, a sample was collected from the 0 to 6-inch interval. At a representative number of random locations, samples were also collected from the 6 to 12-inch interval, the 12 to 18-inch interval, and/or the 18 to 24-inch interval.

Samples were analyzed for polychlorinated biphenyls (PCBs) and RCRA 8 total metals. In addition, soil sample TCLP extracts were analyzed for the RCRA 8 metals.

Analytical results were compared to the higher of the following:

- EPA Region 3 Risk-Based Concentrations (RBCs) for industrial soil,
- EPA Region 9 Preliminary Remediation Goals (PRGs) for industrial soil,
- the Toxic Substances Control Act (TSCA) PCB soil standard for unrestricted areas<sup>1</sup>,
- the mean background soil concentrations for metals in the eastern United States, and
- RCRA standards for the characteristic of toxicity.

Arsenic was detected at concentrations above the arithmetic mean eastern US soil background concentration of 7.4 milligrams per kilogram (mg/kg) in approximately 40 percent of the samples collected, with detections spread fairly evenly across the five stockpile areas. Based on a statistical evaluation of the data, however, it is concluded that arsenic concentrations in soil are comparable to expected background concentrations.

One soil sample extraction from stockpile area SP3 contained an estimated lead concentration of 5.46 milligrams per liter (mg/L), exceeding the RCRA toxicity characteristic criteria of 5.0 mg/L. As a conservative measure, Wilcox & Barton, Inc. recommended removal of an additional 6 inches of soil from the 5' x 5' area surrounding the sample point, followed by collection of two 5-point composite confirmation soil samples to be analyzed for total and TCLP lead. Excavated soil was placed into the roll-off container that had been characterized as hazardous for lead. For the post-excavation samples, analytical results for total lead were below the EPA Region 9 Preliminary Remediation Goal (PRG) for lead in industrial soil. The lead concentration detected in the soil extract, 0.06 mg/L in both samples, was below the RCRA

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<sup>1</sup> No PCB concentrations were detected at or above, or even approaching, the TSCA regulatory level of 50 milligrams per kilogram (mg/kg), so TSCA regulations do not apply. The industrial exposure RBC of 1.4 mg/kg has been applied as the benchmark concentration.

standard. As a result, Wilcox & Barton, Inc. recommended no further action in the former SP-3 area.

PCBs were detected in eight samples from stockpile area SP-5 at concentrations above the applied benchmark of 1.4 (mg/kg). Despite these results, Wilcox & Barton, Inc. concluded that overall site conditions do not pose a health risk to workers in the industrial exposure scenario.

A detailed report, including data tables, statistical evaluation, and laboratory reports was submitted to EPA on May 7, 2008. Wilcox & Barton, Inc. recommended documentation of exposure assumptions, completion of a Stage I Ecological Risk Screening, and site-specific calculation of human health risks for the record. If supported by the conclusions of these steps, the area should receive a cap of clean soil, be re-vegetated and stabilized, and managed under existing institutional controls. As of the date of this Summary Report, a response from EPA concerning these recommendations had not been received.

#### 4.3.3 Groundwater Characterization

One or more 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. Laboratory analytical results indicated that groundwater does not appear to have been impacted by the storage of sandblast grit on the site. Results were summarized in the May 7, 2008 letter report entitled *Results of Sandblast Grit Stockpile Area Evaluation*.

#### 4.3.4 Subsurface Soil Evaluation

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 from the stained interval.

Primary and duplicate samples were collected from the 13- to 15-foot interval retrieved from boring B-4. The samples were analyzed for PCBs, RCRA 8 total metals, volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), extractable petroleum hydrocarbon (EPH) fractions, and EPH target polycyclic aromatic hydrocarbons (PAHs).

Benzo(a)anthracene and benzo(a)pyrene were detected at concentrations above both EPA Region 3 RBCs and EPA Region 9 PRGs for industrial land use. Several other PAHs were detected in the soil samples, though none were found at concentrations exceeding the applicable risk-based benchmarks for industrial exposure.

Groundwater samples were collected from monitoring well MW-1, situated immediately adjacent to the soil boring. The measured concentrations of naphthalene in both the primary and duplicate samples exceeded the VT DEC groundwater enforcement standard of 20.0 ug/L. The detected concentrations of benzo(a)pyrene were only slightly above the standard. Several

additional volatile and semi-volatile organic compounds were also detected in groundwater, but at concentrations below applicable groundwater standards.

The findings were detailed in a letter report dated May 8, 2008 and entitled *Results of Subsurface Evaluation, Stockpile Area SP1*. The subsurface findings were presumed to be related to a former tail race beneath the mill, and possibly associated with historical conditions that were investigated by VT DEC (see Section 1.2). No further recommendations were provided, as these findings were likely unrelated to current operations at the facility.

#### **4.4 Stockpile Characterization**

Shallow soil with visible sandblast grit was scraped from the former stockpile areas and temporarily placed in a stockpile pending disposal characterization. Samples were collected from the 20-yard stockpile on May 7, 2008 and submitted for laboratory analysis. Results were forwarded to EPA via email on May 19, 2008, along with a recommendation that the material be placed in roll-offs and disposed along with the non-hazardous soil. EPA concurred with the recommendation on May 22, 2008. On May 28, 2008, the soil stockpile was placed into two additional roll-offs, bringing the total number of roll-offs containing non-hazardous soil to ten.

#### **4.5 Transportation and Disposal**

##### **4.5.1 Hazardous Soil and Demolition Debris**

On May 28 and 29, 2008, New England Disposal Technologies, Inc. transported two roll-off containers of hazardous lead-contaminated soil and debris to the Stablex Canada facility in Blainville, Quebec. Copies of the signed Hazardous Waste Manifests, profiles, and Certificate of Disposal are provided in Appendix C.

##### **4.5.2 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. Copies of the Non-Hazardous Waste Manifests and profiles are provided in Appendix D.

#### **5.0 HAZARDOUS WASTES - MACE SECURITY INTERNATIONAL, INC. AND BENMONT MILL PROPERTIES, INC.**

Initial site investigation by EPA, coupled with a comprehensive facility inventory by the Respondents, produced a list of items that were determined to be waste, had been left behind by former tenants, were off-spec and not usable, or were simply no longer needed to support current operations. Each of these items was destined for proper packaging and off-site disposal under this removal action.



## 5.1 Work Planning

Wilcox & Barton, Inc. 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, specifically, the proper characterization, management, handling, and disposal of wastes from the spaces leased by MSI and common areas managed by Benmont Mill Properties. 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.

## 5.2 Inventory and Waste Stream Segregation

Using the March 2008 facility inventory as a base, containers were initially segregated using available label information, generator knowledge, and Material Safety Data Sheets. Waste streams were defined as follows:

Waste Stream	Waste Type
1	Grenades, shells, flammable solids
2	Tear gas powders (dry) and associated packaging
3	Non-hazardous liquids, used oil, hydraulic oil, automotive maintenance wastes
4	Pepper oil and tear gas liquids
5	Aerosol canisters with propellants, pepper oil, tear gas agents
6	Miscellaneous solids, sludges, inks, powders
7	Empty containers to be recycled
LP	Laboratory-sized containers repacked into Lab Packs

## 5.3 Sampling and Laboratory Analysis

Materials assigned to waste streams 1, 2, 5, 7, and LP were considered adequately characterized by label information and/or generator knowledge. Waste ammunition was segregated and managed separately from the other waste streams (see discussion below). Waste stream 2 consisted of dry tear gas products that could be identified by physical observation, and were not suitable for shipment to an analytical laboratory because of the perceived health risks. Waste stream 5 included off-spec aerosol canisters that had failed quality control test firing. Contents were known based on the manufacturing process. Waste stream LP consisted of lab packs created based on container labeling and chemical compatibility.

Waste streams 3, 4, and 6 required further characterization for proper handling and disposal. Using procedures described in the Work Plan, containment structures were erected in the areas where these containers were found. Working inside the containment, and under safety supervision and air monitoring protocols, work crews opened each container for visual observation and verification of waste stream assignment.



Representative samples were collected for laboratory analysis. Samples were submitted to the laboratory for analysis for chemical content and for characteristics of ignitability, corrosivity, and toxicity. The analytical suite for most samples included VOCs, SVOCs, PCBs, and metals. On May 13, 2008, all laboratory data supporting the waste characterization were submitted to EPA.

Container handling and sampling work inside the containments was completed on May 2, 2008. The containment structures remained in place, however, pending relocation of all containers to the appropriate staging area (see below). Hazardous waste characterization work, including construction and management of the containment structures, was performed by Cyn Environmental Services, Inc.

## **5.4 Consolidation and Staging**

Separate staging areas were established for the waste ammunition and hazardous waste due to separate handling and safety requirements.

### **5.4.1 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.

### **5.4.2 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 packaged, and decontaminated 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 were moved on pallets via a combination of pallet jacks 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.

On August 27 and 28, 2008, the containers were appropriately labeled prior to transportation,

## **5.5 Waste Profiling and Assignment of Waste Codes**

Following receipt of analytical results for samples from waste streams 3, 4, and 6, some waste stream assignments were changed, and the resulting inventory list was sorted into waste streams with similar disposal characteristics to simplify profiling and manifesting. A proposed disposal inventory with waste code assignments was initially submitted to EPA on May 12, 2008. EPA, in consultation with VT DEC, provided several rounds of comments on the proposed waste codes, shipping name assignments, etc., and 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.

## **5.6 Transportation and Disposal**

### **5.6.1 Waste Ammunition**

The proposed waste profile, waste codes, and manifest for ammunition disposal were approved by EPA via email on May 20, 2008. On May 21, 2008, Veolia Technical Solutions, Inc. transported the waste ammunition to their facility in Sauget, Illinois for disposal by incineration. Completed manifests are provided in Appendix E. Veolia was approved for transportation and disposal of this waste stream by EPA on April 25, 2008. The waste is presently in storage at Veolia's facility and is being managed in accordance with their permit. Certificates of destruction will be forwarded when received.

### **5.6.2 Containerized Waste**

On August 27 and 28, 2008, 21<sup>st</sup> Century Environmental Management, Inc. of Rhode Island transported the remaining hazardous wastes to the Northland Environmental, Inc. facility in Providence, Rhode Island for disposal. Copies of the signed manifests, profiles, and Certificates of Disposal are provided in Appendix F.

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. Copies of the signed manifests, profiles, and Certificates of Recycling are provided in Appendix G.

## **6.0 BULK CS-1 TEAR GAS AGENT - MACE SECURITY INTERNATIONAL, INC.**

### **6.1 Alternatives Evaluation**

MSI explored several options for sale, management, and disposition of approximately 54,000 pounds of ortho-chlorobenzalmalononitrile tear gas agent (CS-1 product) that was stored in

wooden crates on the second floors of the Cold Storage and 1924 Buildings. After evaluating all 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 (168 crates on 21 pallets) pounds were sold to existing customers (following EPA approval), 40 pounds (one crate) were retained on hand for use in product formulations, and the balance (net product weight: 47,640 pounds, gross weight: 111,500 pounds on 149 pallets) was shipped for disposal. [Note: There appears to be a discrepancy in the total quantity of CS-1 pallets on the original inventory. Records indicate that 149 pallets were loaded on trucks and received at the disposal facility, while 21 pallets were sold to others. These numbers indicate a total of 170 pallets, while only 169 pallets appear on the original inventory. This discrepancy likely results from a miscount during the May 2008 facility inventory. Disposal documentation and sales receipts indicate accurate quantities.]

## **6.2 Work Planning**

Wilcox & Barton, Inc. submitted to EPA a Work Plan for the disposal of bulk CS-1 product on May 12, 2008. The work plan was prepared to address, specifically, the proper management, handling, and disposal of the waste.

## **6.3 Labeling/DOT Certification**

Each banded pallet of eight wooden crates was labeled using the following information:

Proper Shipping Name: Tear Gas Substances, Solid, N.O.S.

Chemical Name: ortho-chlorobenzalmalononitrile

Hazard Class: 6.1, Poison

UN/NA Number: UN3448

Packing Group: II

Waste Code: None

Because the original wooden packaging did not meet current DOT packaging specification 4C1, a waiver request was submitted to DOT. On May 16, 2008, DOT issued Permit DOT-SP 14708 authorizing one-way shipment of approximately 55,000 pounds of CS-1 powder for disposal purposes.

## **6.4 Facility Approval**

On May 19, 2008, EPA approved disposal of the bulk CS-1 product at the Veolia Technical Solutions, Inc. facility in Port Arthur, Texas, in accordance with the Work Plan.

## **6.5 Transportation and Disposal**

On May 22, 2008, Freehold Cartage Inc. transported 14,080 pounds of CS-1 product to the Veolia Technical Solutions, Inc. 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 Technical Solutions, Inc. in Port Arthur, Texas for disposal. The total shipment weight, including packaging, was 78,412 pounds. Disposal was by incineration.

Copies of the manifests, profiles, and Certificates of Destruction are provided in Appendix H.

## **7.0 OTHER ISSUES**

During the course of the removal action, the OSC raised additional concerns regarding items not specifically address by the AOC. The following sections provide a brief summary of the status of those items as well as a summary of the work completed.

### **7.1 Storage Tanks - Benmont Mill Properties, Inc.**

There are two aboveground storage tanks located on the property. These appear to have been out of service since acquisition of the property by the current owners. Testing indicates that the asphaltic coating on one of the tanks contains asbestos. EPA has indicated that abatement of the tank coating is required, and that the tanks must either be 1) removed, or 2) taken out of service in accordance with applicable rules.

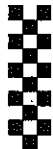
Benmont Mill Properties intends to complete the aforementioned actions by December 29, 2008, pursuant to an extension request submitted to EPA on August 25, 2008.

### **7.2 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.

<b>NON-HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number <b>VTP000013338</b>		2. Page 1 of <b>1</b>	3. Emergency Response Phone <b>(800)999-1038</b>		4. Waste Tracking Number <b>NHM 303162</b>	
5. Generator's Name and Mailing Address <b>BENMONT MILL PROPERTIES INC.</b> Attn: ATTN: JON GOODRICH <b>160 BENMONT AVE</b> <b>BENNINGTON VT 05201</b> Generator's Phone: <b>802 753-1203</b>								
6. Transporter 1 Company Name <b>TAM'S TRANSPORTATION</b>						U.S. EPA ID Number		
7. Transporter 2 Company Name						U.S. EPA ID Number		
8. Designated Facility Name and Site Address <b>WASTE USA</b> <b>403 LANDFILL LANE</b> <b>COVENTRY VT 05825</b> Facility's Phone: <b>802 334-0160</b>						U.S. EPA ID Number		
9. Waste Shipping Name and Description					10. Containers		11. Total Quantity	12. Unit Wt./Vol.
					No.	Type		
1. Non-RCRA, non-DOT						CM		Y
13. Special Handling Instructions and Additional Information <b>NON HAZ SOIL/SAND BLAST MEDIA</b> <i>Container #3 TRK 2B</i>								
14. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for requiring proper disposal of Hazardous Waste.								
Generator's/Officer's Printed/Typed Name <i>William Wilcox</i>					Signature <i>[Signature]</i>		Month Day Year <b>05 14 08</b>	
15. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.					Port of entry/exit: Date leaving U.S.:			
16. Transporter Acknowledgment of Receipt of Materials								
Transporter 1 Printed/Typed Name <i>Len Wadsworth</i>					Signature <i>[Signature]</i>		Month Day Year	
Transporter 2 Printed/Typed Name					Signature		Month Day Year	
17. Discrepancy								
17a. 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								
17b. Alternate Facility (or Generator) Manifest Reference Number: U.S. EPA ID Number								
Facility's Phone:								
17c. Signature of Alternate Facility (or Generator)					Month Day Year			
<b>NEWS of VT, Inc.</b> <b>dba Waste USA</b> <b>P.O. Box 348</b> <b>Newport VT 05855</b>					<i>[Signature]</i>			
18. Designated Facility Owner or Operator: Certification of receipt of materials on this manifest except as noted in item 17a								
Printed/Typed Name <i>Margaret Maxwell</i>					Signature <i>[Signature]</i>		Month Day Year <b>5 15 08</b>	

<b>NON-HAZARDOUS -WASTE MANIFEST</b>		1. Generator ID Number <b>VTP000013338</b>		2. Page 1 of <b>1</b>	3. Emergency Response Phone <b>(800)899-1038</b>		4. Waste Tracking Number <b>NHM 303162</b>	
5. Generator's Name and Mailing Address <b>BENMONT MILL PROPERTIES INC. 160 BENMONT AVE BENNINGTON VT 05201</b>				Att: ATTN: JON GOODRICH Generator's Site Address (if different than mailing address)				
Generator's Phone: <b>802 753-1203</b>								
6. Transporter 1 Company Name <b>TAM'S TRANSPORTATION</b>				U.S. EPA ID Number				
7. Transporter 2 Company Name				U.S. EPA ID Number				
8. Designated Facility Name and Site Address <b>WASTE USA 403 LANDFILL LANE COVENTRY VT 05825</b>				U.S. EPA ID Number				
Facility's Phone: <b>802 334-0160</b>								
9. Waste Shipping Name and Description				10. Containers		11. Total Quantity	12. Unit Wt./Vol.	
				No.	Type			
1. Non-RCRA, non-DOT					CM		Y	NONE
2.								
3.								
4.								
13. Special Handling Instructions and Additional Information <b>NON HAZ SOIL/SAND BLAST MEDIA</b> <i>Container #5 Trk 1 Green Mark</i>								
14. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.								
Generator's/Officer's Printed/Typed Name <b>William Wilcox</b>				Signature <i>[Signature]</i>		Month Day Year <b>05 14 08</b>		
15. 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 export only):								
16. Transporter Acknowledgment of Receipt of Materials								
Transporter 1 Printed/Typed Name <b>TREVOR MANCE</b>				Signature <i>[Signature]</i>		Month Day Year <b>5 14 08</b>		
Transporter 2 Printed/Typed Name <b>X-Lue Harnish</b>				Signature <i>[Signature]</i>		Month Day Year <b>5 14 08</b>		
17. Discrepancy								
17a. 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								
17b. Alternate Facility (or Generator)				Manifest Reference Number: U.S. EPA ID Number				
Facility's Phone:								
17c. Signature of Alternate Facility (or Generator) <b>NEWS of VT, Inc.</b>				Month Day Year				
<b>dba Waste USA</b>								
<b>P.O. Box 345</b>								
<b>Newport, VT 05855</b>								
<b>(802) 334-8300</b>								
18. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 17a								
Printed/Typed Name <b>Margaret Maxwell</b>				Signature <i>[Signature]</i>		Month Day Year <b>5 15 08</b>		



From:

05/19/2008 16:15

#423 P.001/001

<b>NON-HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number VTP000013338	2. Page 1 of 1	3. Emergency Response Phone (800)899-1038	4. Waste Tracking Number NHM 303162
5. Generator's Name and Mailing Address BENMONT MILL PROPERTIES INC. 160 BENMONT AVE BENNINGTON VT 05201 Generator's Phone: 802 753-1203 6. Generator's Site Address (if different than mailing address) ATTN: JON GOODRICH					
6. Transporter 1 Company Name TAM'S TRANSPORTATION				U.S. EPA ID Number	
7. Transporter 2 Company Name				U.S. EPA ID Number	
8. Designated Facility Name and Site Address WASTE USA 403 LANDFILL LANE GOVENTRY VT 05825 Facility's Phone: 802 334-0160				U.S. EPA ID Number	
9. Waste Shipping Name and Description		10. Containers		11. Total Quantity	12. Unit Wt./Vol.
		No.	Type		
1. Non-RORA, non-DOT			CM		Y
2.					
3.					
4.					
13. Special Handling Instructions and Additional Information NON HAZ SOIL/SAND BLAST MEDIA Container # 5					
14. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste. Generator's/Officer's Printed/Typed Name: William Wilcox Signature: [Signature] Month Day Year: 05/19/08					
15. 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):					
16. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name: Lee Harrington Signature: [Signature] Month Day Year: 5/20/08 Transporter 2 Printed/Typed Name: Signature: Month Day Year:					
17. Discrepancy 17a. 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 17b. Alternate Facility (or Generator) NEWS of VT, Inc. dba Waste USA Facility's Phone: P.O. Box 348 17c. Signature of Alternate Facility (or Generator) Newport, VT 05855 [Signature] Month Day Year: 5/20/08					
18. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in item 17a. Printed/Typed Name: Margaret Maxwell Signature: Margaret Maxwell Month Day Year: 5/20/08					

160-BLC-O 6 10498 (Rev. 8/06)

Received Time May. 19. 2:13PM

DESIGNATED FACILITY TO GENERATOR

RECEIVED MAY 20 2008



From:

05/19/2008 15:15

#423 P.001/001

<b>NON-HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number VTP000013338	2. Page 1 of 1	3. Emergency Response Phone (800)899-1038	4. Waste Tracking Number NHM 303162
5. Generator's Name and Mailing Address BENMONT MILL PROPERTIES INC. 160 BENMONT AVE BENNINGTON VT 05201 Generator's Phone: 802 753-1203					
6. Transporter 1 Company Name TAM'S TRANSPORTATION U.S. EPA ID Number					
7. Transporter 2 Company Name U.S. EPA ID Number					
8. Designated Facility Name and Site Address WASTE USA 403 LANDFILL LANE COVENTRY VT 05825 Facility's Phone: 802 334-0160 U.S. EPA ID Number					
9. Waste Shipping Name and Description		10. Containers		11. Total Quantity	12. Unit Wt/Vol
1. Non-RCRA, non-DOT		No.	Type		
			CM		Y
2.					
3.					
4.					
13. Special Handling Instructions and Additional Information NON HAZ SOIL/SAND BLAST MEDIA  Container #9					
14. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.					
Generator's/Officer's Printed/Typed Name William Wilcox		Signature <i>[Signature]</i>		Month Day Year 05/19/08	
15. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.		Port of entry/exit: Date leaving U.S.:			
16. Transporter Acknowledgment of Receipt of Materials					
Transporter 1 Printed/Typed Name Len Wanders		Signature <i>[Signature]</i>		Month Day Year 5/20/08	
Transporter 2 Printed/Typed Name		Signature		Month Day Year	
17. Discrepancy					
17a. 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					
17b. Alternate Facility (or Generator)		Manifest Reference Number:		U.S. EPA ID Number	
Facility's Phone: NEWS of VT, Inc. dba Waste USA P.O. Box 348 Newport, VT 05855					
17c. Signature of Alternate Facility (or Generator) <i>[Signature]</i>		Signature <i>[Signature]</i>		Month Day Year 5/20/08	
18. Designated Facility Owner or Operator: Certification of receipt of materials covered by this manifest except as noted in item 17c.					
Printed/Typed Name Margaret Maxwell		Signature <i>[Signature]</i>		Month Day Year 5/20/08	

165-BLC-0 6 10499 (Rev. 8/06)

DESIGNATED FACILITY TO GENERATOR

Received Time May. 19. 2:13PM

RECEIVED MAY 20 2008



<b>NON-HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number <b>VTP000013338</b>		2. Page 1 of <b>1</b>	3. Emergency Response Phone <b>(800)899-1038</b>		4. Waste Tracking Number <b>NHM 303162</b>						
5. Generator's Name and Mailing Address <b>BENMONT MILL PROPERTIES INC. 160 BENMONT AVE BENNINGTON VT 05201</b>					Att: ATTN: JON GOODRICH Generator's Site Address (if different than mailing address)								
Generator's Phone: <b>802 753-1203</b>													
6. Transporter 1 Company Name <b>TAM'S TRANSPORTATION</b>					U.S. EPA ID Number								
7. Transporter 2 Company Name					U.S. EPA ID Number								
8. Designated Facility Name and Site Address <b>WASTE USA 403 LANDFILL LANE COVENTRY VT 05825</b>					U.S. EPA ID Number								
Facility's Phone: <b>802 334-0160</b>													
9. Waste Shipping Name and Description					10. Containers		11. Total Quantity	12. Unit Wt./Vol.					
					No.	Type							
1. Non-RCRA, non-DOT					<b>001</b>	<b>CM</b>	<b>15</b>	<b>Y</b>					
12. Special Handling Instructions and Additional Information <b>NON HAZ SOIL/SAND RI/AST MEDIA</b> <div style="border: 1px solid black; border-radius: 50%; padding: 10px; display: inline-block; margin-top: 10px;"><b>Stockpile 1B</b></div>													
14. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.													
Generator's/Officer's Printed/Typed Name <b>Wm. Wilcox Agent For Generator</b>					Signature <i>Wm. Wilcox</i>		Month Day Year <b>05 29 08</b>						
15. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____													
16. Transporter Acknowledgment of Receipt of Materials													
Transporter 1 Printed/Typed Name <b>TREBOR MAJCE</b>					Signature <i>Trebor Majce</i>		Month Day Year <b>05 24 08</b>						
Transporter 2 Printed/Typed Name <b>per Wandrey</b>					Signature <i>per Wandrey</i>		Month Day Year <b>06 05 08</b>						
17. Discrepancy													
17a. 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: _____													
17b. Alternate Facility (or Generator) <b>NEWS of VT, Inc. dba Waste USA</b>					U.S. EPA ID Number								
Facility's Phone: _____													
17c. Signature of Alternate Facility (or Generator) <b>P.O. Box 348 Newport, VT 05855 (802) 334-6300</b>					Month Day Year ____								
18. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 17a													
Printed/Typed Name <b>Margaret Maxwell</b>					Signature <i>Margaret Maxwell</i>		Month Day Year <b>06 05 08</b>						

<b>NON-HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number <b>VTP000013338</b>		2. Page 1 of <b>1</b>	3. Emergency Response Phone <b>(800)899-1038</b>		4. Waste Tracking Number <b>NHM 303162</b>		
		5. Generator's Name and Mailing Address <b>BENMONT MILL PROPERTIES INC. 160 BENMONT AVE BENNINGTON VT 05201</b> Generator's Phone: <b>802 753-1203</b>							
<b>GENERATOR</b>		6. Transporter 1 Company Name <b>TAM'S TRANSPORTATION</b>				U.S. EPA ID Number			
		7. Transporter 2 Company Name				U.S. EPA ID Number			
<b>DESIGNATED FACILITY</b>		8. Designated Facility Name and Site Address <b>WASTE USA 403 LANDFILL LANE COVENTRY VT 05825</b> Facility's Phone: <b>802 334-0160</b>				U.S. EPA ID Number			
		9. Waste Shipping Name and Description		10. Containers		11. Total Quantity	12. Unit Wt./Vol.		
		No.	Type						
1. Non-RCRA, non-DOT		<b>001</b>	<b>CM</b>	<b>6</b>	<b>Y</b>				
2.									
3.									
4.									
<b>TRANSPORTER</b>		13. Special Handling Instructions and Additional Information <b>NON HAZ SOIL/SAND BLAST MEDIA</b>  <b>Roll off #2</b>							
		14. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.							
<b>INTL</b>		Generator's/Officer's Printed/Typed Name <b>Am. Wilcox Agent For Generator</b>				Signature <i>Am. Wilcox</i> Month Day Year <b>05 29 08</b>			
		15. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.				Port of entry/exit: Date leaving U.S.:			
<b>TRANSPORTER</b>		16. Transporter Acknowledgment of Receipt of Materials							
		Transporter 1 Printed/Typed Name <b>TREVOR MANCE</b>				Signature <i>T. Mance</i> Month Day Year <b>05 29 08</b>			
<b>DESIGNATED FACILITY</b>		Transporter 2 Printed/Typed Name				Signature <i>L. Mance</i> Month Day Year			
		17. Discrepancy							
<b>DESIGNATED FACILITY</b>		17a. 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							
		17b. Alternate Facility (or Generator)				Manifest Reference Number:			
<b>DESIGNATED FACILITY</b>		Facility's Phone: <b>NEWS of VT, Inc.</b>				U.S. EPA ID Number			
		17c. Signature of Alternate Facility (or Generator) <b>dba Waste USA P.O. Box 348 Newport, VT 05855 (802) 334-8200</b>				Month Day Year			
<b>DESIGNATED FACILITY</b>		18. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 17a							
		Printed/Typed Name <b>Margaret Maxwell</b>				Signature <i>Margaret Maxwell</i> Month Day Year <b>6 10 08</b>			

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

Form Approved OMB No. 2050-0089

1. Generator ID Number <b>VT P 000013555</b>		2. Page 1 of 1		3. Emergency Response Phone <b>800-888-1055</b>		4. Manifest Tracking Number <b>004134506 JJK</b>	
5. Generator's Name and Mailing Address <b>Bernmont Mill Properties, Inc. 160 Bernmont Avenue Barnington VT 05201</b>							
Generator's Phone: <b>802 447-1503</b>							
6. Transporter 1 Company Name <b>New England Disposal Technologies, Inc.</b>						U.S. EPA ID Number <b>MACS00008059</b>	
7. Transporter 2 Company Name						U.S. EPA ID Number	
8. Designated Facility Name and Site Address <b>Stalex Canada, Inc. 760 Industrial Blvd. Blainville QC J7C 3M4</b>						U.S. EPA ID Number <b>NYD980756415</b>	
Facility's Phone: <b>438 430-9236</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 (kg/Lb)	13. Waste Codes	
		No.	Type				
1	<b>RQ UN3077, WASTE, Environmentally hazardous substances, solid, n.o.s. (lead)</b> <b>9, PGII</b>	<b>001</b>	<b>CM</b>	<b>EST 19</b>	<b>T</b>	<b>D008</b>	
2							
3							
4							
14. Special Handling Instructions and Additional Information <b>1) ERG171</b> <b>Enpro Services of Vermont Inc acting as an intermediary arranging for export</b> <b>Job# 09-8209</b>							
15. GENERATOR'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/Owner's Printed/Typed Name <b>Am. Int'l. Corp. Agent for Generator</b>				Signature <i>Am. Int'l.</i>		Month Day Year <b>12/28/08</b>	
16. International Shipments <input type="checkbox"/> Import to U.S. <input checked="" type="checkbox"/> Export from U.S.				Port of export: <b>Highgate Springs VT</b> Date leaving U.S.: <b>1/5/09</b>			
17. Transporter Acknowledgment of Receipt of Materials							
Transporter 1 Printed/Typed Name <b>William Stoddard</b>				Signature <i>William Stoddard</i>		Month Day Year <b>12/28/08</b>	
Transporter 2 Printed/Typed Name				Signature		Month Day Year	
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 <b>N = 31552 P</b>							
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>H132-T</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>FRANCE TRECAVIER</b>				Signature <i>FRANCE TRECAVIER</i>		Month Day Year <b>12/28/08</b>	

Please print or type. (Form does not fit on site (12-pitch) (generator))

Form Approved OMB No. 2050-0038

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number VT P 000013336		2. Page 1 of 2		3. Generator Telephone Number 802-447-1503		4. Manifest Tracking Number 004134507 JJK		
5. Generator's Name and Mailing Address Berrington Hill Properties, Inc. 160 Berrington Avenue Berrington VT 05201										
6. Generator's Phone: 802 447-1503										
7. Transporter 1 Company Name New England Disposal Technologies, Inc.								U.S. EPA ID Number VT P 00008059		
7. Transporter 2 Company Name								U.S. EPA ID Number		
8. Designated Facility Name and Site Address Standex Canada, Inc. 760 Industrial Blvd. Bainville QC J7C 3V4 Facility's Phone: 450 430-9230								U.S. EPA ID Number NYD 980758415		
GENERATOR	9a. HW	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 Wt./Vol.	13. Waste Codes
	X	1. RG UN3077, WASTE Environmentally hazardous substances, solid, n.o.s. (lead) 9, PGII				001	CM	EST 8	T	3005
14. Special Handling Instructions and Additional Information 1) ERG1171 Expro Services of Vermont Inc acting as an intermediary arranging for export. Job# 09-8209										
15. GENERATOR'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 Officer's Printed/Typed Name Wm. Anderson Agent For										
Signature Wm. Anderson										
Month Day Year 05/29/08										
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input checked="" type="checkbox"/> Export from U.S. Part of consignment: HIGH GATE SPRINGS, VT Date leaving U.S.: 5/30/08									
	Transporter signature (for exports only): William Stoddard									
	17. Transporter Acknowledgment of Receipt of Materials									
Transporter 1 Printed/Typed Name William Stoddard										
Signature William Stoddard										
Month Day Year 05/29/08										
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									
	N = 9967 P.									
	Manifest Reference Number									
	U.S. EPA ID Number									
18b. Alternate Facility (or Generator)										
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. H132-T 2. 3. 4.										
20. Designated Facility Owner or Operator. Certification of receipt of hazardous materials covered by the manifest except as noted in item 19a										
Printed/Typed Name MARCEL DORRIS										
Signature MARCEL DORRIS										
Month Day Year 05/30/08										