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September 12, 2005

184202.PP.02.01

Tom Williams
Work Assignment Manager (SR-6J)
U.S. Environmental Protection Agency
77 West Jackson Blvd.
Chicago, IL 60604-3507

Subject: Waste Handling Plan and 2004 Annual Report
Penta Wood Products Site, Siren, WI
WA No. 201-RALR-05WE, Contract No. 68-W6-0025

Dear Mr. Williams:

Per your request, in lieu of issuing final documents, enclosed please find new title pages for the Waste Handling Plan and the 2004 Annual Report for the Penta Wood Products Site in Siren, Wisconsin. New title pages have also been sent to the Wisconsin Department of Natural Resources (WDNR) Project Manager, Bill Schultz.

If you have any questions, please feel free to call me at 414-847-0341.

Sincerely,

CH2M HILL

William M. Andrae

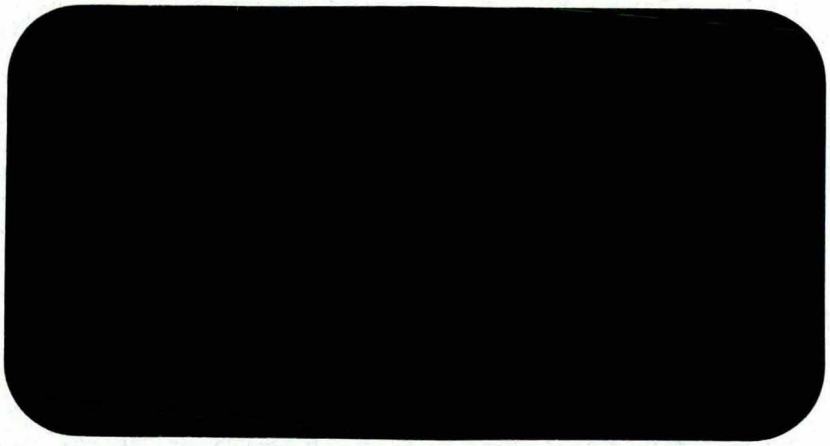
Bill Andrae
Site Manager

Enclosures
c: Stephen Nathan, PO/U.S. EPA, Region 5 (w/o enclosure)
Dave Alberts, CO/U.S. EPA, Region 5 (w/o enclosure)
Bill Schultz/WDNR, Rhinelander
Ike Johnson, PM/CH2M HILL, Milwaukee
Dan Plomb, DPM/CH2M HILL, Milwaukee
Regina Bayer, QAM/CH2M HILL, Milwaukee
Keli McKenna, ASM/CH2M HILL, Milwaukee
Cherie Wilson, AA/CH2M HILL, Milwaukee

RAC V

RESPONSE ACTION CONTRACT FOR

Remedial, Enforcement Oversight, and
Non-Time Critical Removal Activities at Sites of Release
or Threatened Release of Hazardous Substances in Region V



PREPARED FOR

U.S. Environmental Protection Agency

PREPARED BY

CH2M HILL
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TN & Associates, Inc.
Tucker, Young, Jackson, Tull, Inc.

WASTE HANDLING PLAN

Penta Wood Products Site
Town of Daniels, Wisconsin
WA No. 201-RALR-05WE/ Contract No. 68-W6-0025

September 2005

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Abbreviations and Acronyms

ACZA	ammonia, copper II oxide, zinc, arsenate
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CESQG	Conditionally Exempt Small Quantity Generator
CFR	Code of Federal Regulations
DAF	dissolved air flotation
DOT	Department of Transportation
HAZMAT	hazardous materials
HAZWOPER	Hazardous Waste Operations and Emergency Response
IDW	investigation-derived wastes
LGAC	liquid-phase granular activated carbon
LNAPL	light nonaqueous phase liquid
LQG	Large Quantity Generator
MSDS	Material Safety Data Sheet
NAPL	nonaqueous phase liquid
NFPA	National Fire Protection Association
NR	Natural Resources
O&M	Operation and Maintenance
OSHA	Occupational Safety and Health Administration
OWS	oil/water separator
PCP	pentachlorophenol
PPE	personnel protective equipment
PWP	Penta Wood Products
RCRA	Resource Conservation and Recovery Act
RDVF	rotary drum vacuum filter
ROD	Record of Decision
SQG	Small Quantity Generator
TSD	treatment, storage, and disposal
WDNR	Wisconsin Department of Natural Resources
WPDES	Wisconsin Pollutant Discharge Elimination System
USEPA	U.S. Environmental Protection Agency

1 Introduction

The Penta Wood Products (PWP) Site is an inactive wood-treating facility located on Daniels 70 (former State Route 70) in Siren, Burnett County, Wisconsin. PWP operated from 1953 to 1992. Raw timber was cut into posts and telephone poles and treated with either a 5- to 7-percent pentachlorophenol (PCP) solution in a No. 2 fuel oil carrier, or with a waterborne salt treatment called Chemonite consisting of ammonia, copper II oxide, zinc, and arsenate (ACZA).

A dissolved-phase PCP plume exists in the groundwater and appears to be stable. The No. 2 fuel oil carrier is present on the water table as a light nonaqueous phase liquid (LNAPL). A treatment system has been designed and installed to extract groundwater and LNAPL and to treat the dissolved PCP and other organic contaminants to the required discharge standards.

The PWP Site is undergoing a remedial action pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). Soil contaminated with PCP and No. 2 fuel oil was addressed under a U.S. Environmental Protection Agency (USEPA) Region 5 emergency removal action. Groundwater treatment, which includes the extraction of LNAPL and dissolved PCP plume using extraction and bioventing, is currently being conducted at the site. Proper handling, documentation, and disposal of waste products during the long-term groundwater remediation activities at this site are extremely important. The purpose of this document is to describe the handling and disposal procedures to be followed for waste generated during the site remediation activities including operation and maintenance of the groundwater treatment system and sampling activities. If a waste generated onsite is not addressed in this document, contact Bill Andrae/CH2M HILL at 414-847-0341 to determine the proper handling, management, and disposal of the waste.

1.1 Document Organization

The following sections provide detailed information in the proper handling and management of waste streams generated at the PWP Site:

- Section 2—Regulatory requirements for the generator classifications
- Section 3—General guidelines for accumulation standards and the storage of waste
- Section 4—Guidelines for documenting the generation, storage, and disposal of waste
- Section 5—Detailed instructions for the management of waste streams currently identified for the site
- Section 6—Regulatory requirements and guidelines for personnel involved with the handling and management of hazardous waste

- Section 7—Regulatory requirements for preparedness and prevention in case of an emergency involving hazardous waste
- Section 8—General response guidelines for personnel in case of an emergency involving hazardous waste

The appendixes provide example manifests, profiles, and other documentation required for the waste streams currently identified for the site.

1.2 Modifications to System

Modifications or improvements to the system or changes in operating procedures may require revisions to selected portions of this Waste Handling Plan. Sections, tables, drawings or appendixes in which changes are made will be revised and reissued for insertion into the existing document. The revisions will be numbered sequentially, with the original document numbered as Revision 0. The revision number will be indicated in the header on each page. The section, table, drawing, or appendix being revised and the revision number will be described in the Master Revision Index and Summary (Table 1-1).

TABLE 1-1
Master Revision Index and Summary
Penta Wood Products Site

Revision Number	Date	Applicable Sections, Tables, Drawings or Appendices
0	June 2005	Original Document

2 Generator Status Classifications

Per 40 Code of Federal Regulations (CFR) 262.11, any person who produces or generates a waste must determine if that waste is hazardous. This regulation also provides the outline of the hazardous waste determination process. The extent of regulations to which hazardous waste generators are subject depends on the volume of hazardous waste produced.

Generators fall into one of three general groups according to the amount of waste generated in a calendar month. The three classifications are described in Table 2-1.

TABLE 2-1
Definition of Generator Classifications
Penta Wood Products Site

Generator	Quantity	Applicable Regulations[a]
Large Quantity Generator (LQG)	> 1,000 kg/month (approx. 2,200 lb) > 1 kg/month acute[b] (approx. 2.2 lb) > 100 kg acute[b] residue or contaminated soil	All 40 CFR Part 262 Regulations
Small Quantity Generator (SQG)	Between 100–1,000 kg/month (approx. 220–2,200 lb)	40 CFR Part 262 Subparts A, B, C (40 CFR 262.34(d) is specific to SQGs); and portions of Subpart D as specified in 40 CFR 262.44
Conditionally Exempt Small Quantity Generator(CESQG)	≤ 100 kg/month ≤ 1 kg acute[b] ≤ 100 kg acute[b] residue or contaminated soil	40 CFR 261.5

[a] 40 CFR Subparts E–H are applicable to specific circumstances (i.e., exports, imports, and farmers).
[b] Acute hazardous wastes are those listed wastes identified in 40 CFR 261.31 261.32 or 261.33(e) with (H).

Generators must count the quantity of hazardous waste generated each month in order to determine their generator status. The regulations stating which hazardous wastes are counted in a generator's monthly quantity determination are found in 40 CFR 261.5(c) and (d). Of the wastes generated onsite to date, the following wastes do not need to be counted:

- The volume of groundwater treated in the onsite treatment system and discharged to the onsite infiltration basin are not counted per 40 CFR 261.5 (c)(2), which states hazardous waste managed immediately upon generation in a wastewater treatment unit is not included in the quantity of hazardous waste. Owners/operators of wastewater treatment units are exempt from the requirements of 40 CFR 264.1 for generators of hazardous waste.

- The volume of material collected for samples that are sent to the laboratory for analysis (Natural Resources [NR] 605.05[7])

The operation of the PWP groundwater treatment system is expected to generate various hazardous waste streams. The volume of hazardous waste to be generated is anticipated to be greater than 1,000 kg/month; therefore, PWP will be considered a large-quantity generator. The various waste streams and estimated amount to be generated is provided in Section 5.

LQGs and SQGs are subject to regulations contained in 40 CFR Part 262 as outlined in Table 2-2. The summary is based on the July 2004 edition of 40 CFR Part 262.

TABLE 2-2
Federal Requirements for Hazardous Waste Generators
Penta Wood Products Site

Requirement	SQG	LQG
Receive a USEPA Identification Number	Required [40 CFR 262.12]	Required [40 CFR 262.12]
Storage Requirements	Basic requirements with technical standards for tanks or containers [40 CFR 262.34(d)(2) and (3)]	Full compliance for management of tanks, containers, drip pads, or containment buildings [40 CFR 262.34(a)]
Packaging hazardous waste according to U.S. Department of Transportation (DOT) standards	Required [40 CFR 262.30]	Required [40 CFR 262.30]
Labeling hazardous waste according to DOT standards	Required [40 CFR 262.31]	Required [40 CFR 262.31]
Marking each package with the words "Hazardous Waste," with the date accumulation begins, and marked with verbiage in 40 CFR 262.32(b)[a]	Required [40 CFR 262.32 and 40 CFR 262.34(a)(2-3) and (d)(4)]	Required [40 CFR 262.32 and 40 CFR 262.34(a)(2-3)]
Appropriate placards for transportation vehicles according to DOT standards	Required [40 CFR 262.33]	Required [40 CFR 262.33]
Preparing hazardous waste manifests	Required[b] [40 CFR 262.20-262.23]	Required [40 CFR 262.20-262.23]
Record keeping and reporting	Required—except biennial reports and manifest exception reports are not required; required to provide copies of open manifests[c] to USEPA within 60 days of the date the waste was shipped [40 CFR 262.40(a) and (c-d), 262.42(b), 262.43, and 262.44]	Required [40 CFR 262.40, 262.41, 262.42(a) and 262.43]
Comply with preparedness and prevention requirements according to Part 265, Subpart C	Required [40 CFR 262.34(d)(4)]	Required [40 CFR 262.34(a)(4)]

TABLE 2-2
Federal Requirements for Hazardous Waste Generators
Penta Wood Products Site

Requirement	SQG	LQG
Comply with contingency plan and emergency procedure requirements according to Part 265, Subpart D	Exempt[d] [40 CFR 262.34(d)(5)(i) and (ii)]	Required [40 CFR 262.34(a)(4)]
Comply with the personnel training requirements of 40 CFR 265.16	Exempt[e] [40 CFR 262.34(d)(5)(iii)]	Required [40 CFR 262.34(a)(4)]
Comply with closure requirements for the accumulation units per 40 CFR 265.111 and 40 CFR 265.114	Exempt [40 CFR 262.34(d)]	Required [40 CFR 262.34(a)(1)]

[a] The verbiage found in 40 CFR 262.32(b) is generally included on a "Hazardous Waste Label."
[b] EPA allows an exception to the manifest requirements when SQGs ship hazardous waste offsite for recycling pursuant to a contractual recycling (tolling) agreement with a recycling firm. In such a situation, a manifest is not required so long as the following criteria are met: (1) the contractual agreement specifies the type of waste and frequency of recycling shipments, (2) the waste is transported to the recycling facility and the regenerated product is returned to the SQG in a vehicle that is owned and operated by the recycling facility, (3) the SQG retains a copy of the recycling agreement on file for at least 3 years following termination of the agreement [see 40 CFR 262.20(e)].
[c] An open manifest is one for which the generator has not received a signed copy of the manifest from the owner/operator of the designated facility.
[d] Although SQG are exempt from the requirements of 40 CFR 265 Subpart D, the emergency response and contingency plan requirements in 40 CFR 262.34(d)(5)(i) and (ii) must be met.
[e] Although SQG are exempt from the requirements of 40 CFR 265.16, the minimal training requirements in 40 CFR 262.34(d)(5)(iii) must be met.

3 Accumulation Standards

Storage of hazardous waste generally requires a permit under the Resource Conservation and Recovery Act (RCRA) regulations. There are provisions, however, that allow a generator to "accumulate" hazardous waste onsite without a permit as long as the accumulation units and the facility comply with specific regulations as described below. Generators accumulating hazardous waste must comply with the regulations applicable to the accumulation unit (containers, tanks, etc.) based on the generator status classification. The length of time that a generator is allowed to accumulate waste onsite without a permit will vary depending on the generator classification, as shown in Table 3-1. The regulations pertaining to accumulation of hazardous wastes onsite are found in 40 CFR 262.34 for LQG and SQG.

TABLE 3-1
Accumulation Time Based upon Generator Type (40 CFR 262)
Penta Wood Products Site

Generator	Onsite Accumulation Time	Onsite Quantity Limit
LQG	90 days	No Limit
SQG	180 days	6,000 kg
CESQG	N/A	1,000 kg 1 kg acute 100 kg acute spill residue

An SQG may accumulate up to 6,000 kg of hazardous waste in the central accumulation area for 180 days or less without a storage permit or interim status, if the SQG complies with the modified standard on 40 CFR 262.34(d-f). Per 40 CFR 262.349(e), if the treatment, storage, and disposal (TSD) facility is 200 miles or more away, the generator may accumulate hazardous waste for 270 days or less. If the generator exceeds the 6,000 kg limit or the applicable accumulation time limit, it becomes subject to all applicable requirements of Parts 264/265 for a LQG. Note that these extended time limits only apply to SQGs accumulating waste in tanks or containers.

For a LQG, accumulated hazardous waste is allowed to accumulate onsite for up to 90 days in a central accumulation area without obtaining a storage permit or interim status, provided the LQG is in compliance with 40 CFR 262.34(a-b).

Generators may receive a 30-day extension to their 90-day, 180-day, or 270-day accumulation period if uncontrollable and unforeseen circumstances cause them to accumulate waste onsite for longer than the allowed time period. Such an extension may be granted by a Regional Administrator or authorized state on a case-by-case basis (40 CFR 262.34(b) and 262.34(f)).

The PWP Site has four designated central accumulation areas as shown in Figure 1. The first central accumulation area (Area 1) is located in the treatment building adjacent to the

carbon vessels and is used for the storage of bag filters. The second central accumulation area is the concrete pad outside the Rotary Drum Vacuum Filter (RDVF) room (Area 2) and is used to store filter cake containers. The third central accumulation area for carbon supersacks (Area 3) is located outside the pretreatment building along the driveway. The fourth central accumulation area for LNAPL (see Figure 1, Area 5) is located outside the pretreatment and treatment buildings.

3.1 Satellite Accumulation Area

Generators are allowed to accumulate up to 55 gallons of hazardous waste or 1 quart of acutely hazardous waste at or near the point where it is initially generated and collected during daily operations.

Per 40 CFR 262.34(c), satellite accumulation areas do not require a permit or interim status, provided the following:

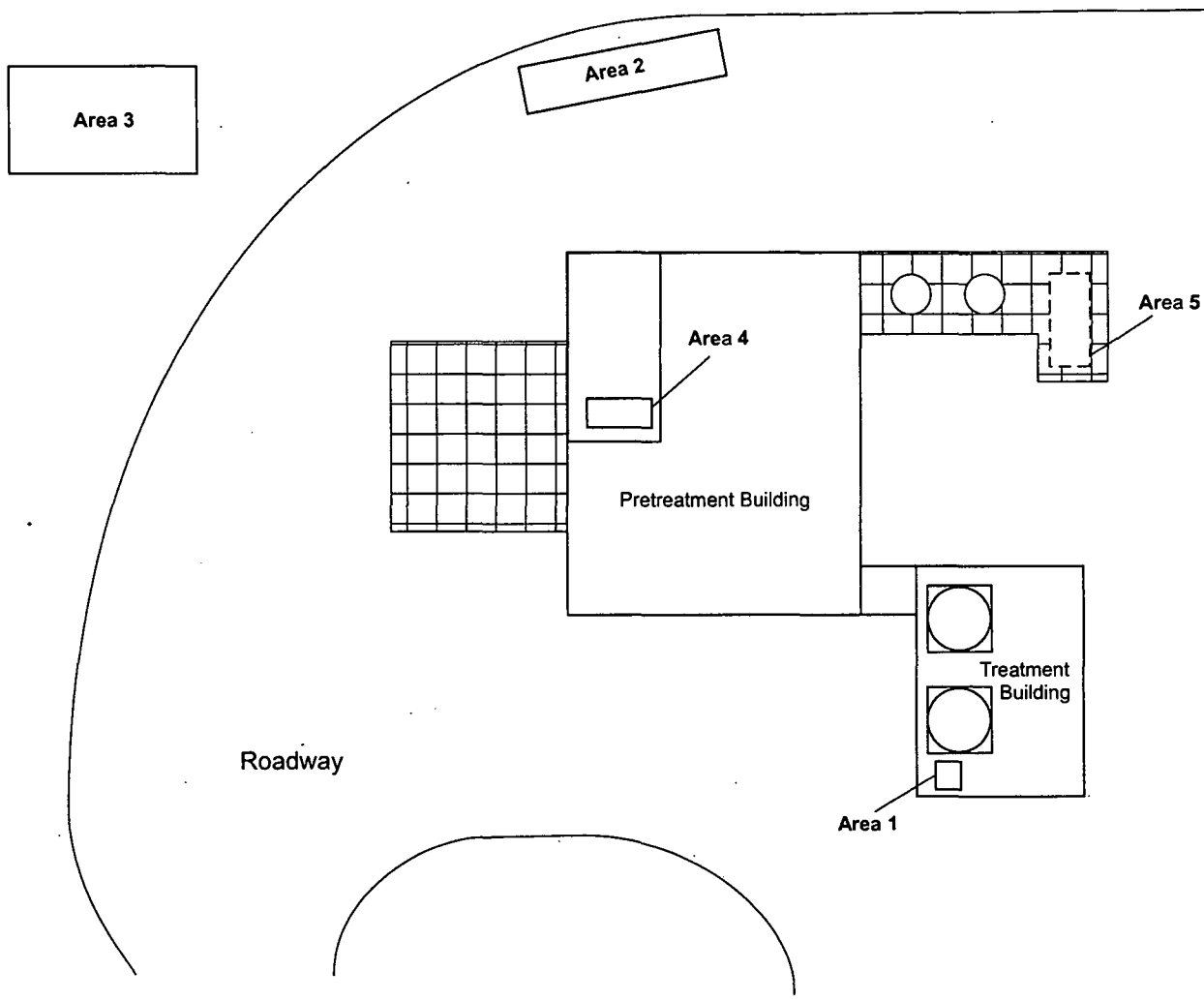
- The container holding the hazardous waste is in good condition and does not leak. If the container holding the hazardous waste is not in good condition, or if it begins to leak, the owner or operator must transfer the hazardous waste from this container to a container that is in good condition, or manage the waste in some other way that complies with 40 CFR Subpart I.
- The owner or operator must utilize a container made of or lined with materials that will not react with and are otherwise compatible with the hazardous waste to be stored, so the ability of the container to contain the waste is not limited.
- The container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste. The container must not be opened, handled, or stored in a manner that may rupture the container or cause it to leak.
- The container must be marked with the words "Hazardous Waste" or with other words that identify the contents of the container.

There are no time limits on filling the satellite accumulation area. Once the 55-gallon or 1-quart limit is reached in the satellite area, the 55-gallon drum must be sealed, labeled, and moved within 3 days to the central accumulation area.

The PWP Site has two satellite accumulation areas as shown in Figure 1. The first satellite area (Area 1) for bag filter and investigation-derived waste accumulation, is located in the treatment building adjacent to the carbon vessels and is equipped with a spill pad for four 55 gallon drums. The second satellite area (Area 4) for cake accumulation is located in the pretreatment building.

3.2 Accumulation Start Date

The Accumulation Start Date is considered to be the day when material is moved to the central accumulation area. The accumulation start date is not added to a satellite accumulation unit until it is full or removed and taken out of service and placed in the central accumulation area.



LEGEND

Area 1 - Satellite and Central Accumulation Area for Bag Filters
Area 2 - Central Accumulation Area for Filter Cake
Area 3 - Central Accumulation Area for Carbon Supersacks
Area 4 - Satellite Accumulation Area for Filter Cake
Area 5 - Central Accumulation Area for LNAPL

FIGURE 1
Satellite and Central Accumulation Areas
Waste Handling Plan
Penta Wood Products Site

4 Documentation

Providing and maintaining the necessary records are essential to properly manage the waste streams generated onsite. The following provide guidelines for documenting the generation and storage of hazardous waste. Additional information may be required to complete the documentation necessary for properly handling and managing of various waste streams.

4.1 General

The following general information is needed for filling out most waste handling documentation:

Facility Name and Address:

USEPA
Former Penta Wood Products, Inc.
8682 Daniels 70
Siren, WI 54872
(715) 349-8357

USEPA Identification Number:

WID006176945

Site Operator:

Mary Wicklund

USEPA Work Assignment Manager:

USEPA
Tom Williams
SR-6J
77 West Jackson Blvd.
Chicago, IL 60604-3507
(312) 886-6157

CH2M HILL Site Manager:

Bill Andrae
Project Manager
CH2M HILL
135 South 84th Street, Suite 325
Milwaukee, WI 53214-1456
(414) 847-0341

4.2 Waste Codes

USEPA and the Wisconsin Department of Natural Resources (WDNR) have determined that the PCP-contaminated groundwater is considered a listed hazardous waste carrying the federal waste code of F032. The waste also carries a secondary designation in Wisconsin of F027 as a result of the stricter state listing criteria by the state of Wisconsin.

4.2.1 F027

Discarded, used or unused formulations containing tri-, tetra-, or pentachlorophenol or discarded used or unused formulations containing compounds derived from these chlorophenols. This listing does not include formulations containing hexachlorophene synthesized from prepurified 2,4,5-trichlorophenol as the sole component (definition per NR 605.09).

4.2.2 F032

Wastewaters (except those that have not come in contact with process contaminants), process residuals, preservative drippage, and spent formulations from wood-preserving processes generated at plants that currently use or have previously used chlorophenolic formulations (except potentially cross-contaminated wastes that have had the F032 waste code deleted in accordance with 40 CFR 261.35 or potentially cross-contaminated wastes that are otherwise currently regulated as hazardous wastes [that is, F034 or F035], and where the generator does not resume or initiate use of chlorophenolic formulations). This listing does not include K001 bottom sediment sludge from the treatment of wastewater from wood-preserving processes that use creosote and/or pentachlorophenol (definition per 40 CFR 261.30).

The WDNR requires that F032 be listed on the manifest as the primary hazardous waste code and "F027 in Wisconsin Only" be added to the manifest comment section.

Generally, other wastes derived from the treatment of the groundwater would be considered listed hazard waste under the "derived from" rule and will carry the same waste codes according to NR 605.04(1)(b)4. If a waste generated onsite is not addressed in this document, contact Bill Andrae/CH2M HILL at 414-847-0341 to determine applicable waste codes, proper handling, management, and disposal of the waste.

4.3 Markings and Labels

In accordance with 40 CFR 262 Subpart C, prior to transport of hazardous waste offsite, the Site Operator will properly package, label, and mark each package in accordance with applicable DOT regulations under 49 CFR. A container in the satellite accumulation area will be marked with the following:

- A description of the material identifying the contents of the container (that is, LNAPL, soil cuttings, etc.)
- The general description of the source of the material (that is, from treatment system or oil/water separator (OWS))
- Both the generator and the state manifest document number must be entered on the hazardous waste label

At the time the waste is determined to be hazardous, the container will be clearly marked with the words "Hazardous Waste." All labeling will be done using a paint pen or equivalent indelible ink.

When the container is full and/or sealed for disposal and ready to be placed in the central accumulation area, the proper label will be adhered to the container and the accumulation start date added. The selection of the proper label will be determined based on the characterization of the waste by either analytical testing or generator knowledge. The Site Operator will be instructed as to the type of label to place on the container and the necessary information required to complete the label, since each waste shipment will be different.

Appendix A contains an example of a blank hazardous waste label that must be placed on containers used for the storage and transportation of hazardous waste. Labels must be completed prior to transportation. Appendix B contains an example of a blank nonhazardous waste label that can be placed on containers used for the storage of nonhazardous waste.

4.4 Manifests

Per Wisconsin Administrative Code NR 615, generators of hazardous waste transported to an offsite TSD facility located other than where the waste was generated, will not allow the shipment of hazardous waste unless it is accompanied by a manifest. Hazardous waste is usually handled by three parties: generators, transporters, and the designated TSD facility. All three parties are responsible for completing certain parts of the hazardous waste manifest. The manifest remains with the hazardous waste until it is delivered to the TSD.

A Wisconsin manifest will be used unless the waste is shipped to a state that requires use of its own manifest. Each Wisconsin manifest form contains six copies. The life cycle of the manifest is as follows:

1. When the transporter picks up the waste at the PWP Site, the Site Operator and the transporter will sign the manifest. The Site Operator will send Copy 1 and 2 to the Project Manager.
   - Copy 1—Project Manager sends this copy to the WDNR within 5 working days of the shipment's initiation
   - Copy 2—Project Manager keeps this copy in the project files
2. The remaining copies accompany the waste throughout the transport to the final TSD facility. When the transporter delivers the waste to the facility, the facility signs the manifest.
   - Copy 3—Wisconsin manifest—TSD facility sends this copy to WDNR

     Out-of-state manifests—TSD facility sends this copy to the environmental regulatory agency in the state where the TSD facility is located. In addition, the Wisconsin generator must also send the DNR a copy of the closed manifest within 5 days of receipt from the TSD facility. The copy will be sent by the Site Manager to: Wisconsin DNR, Bureau of Waste Management, P.O. Box 8094, Madison, WI 53708. This must be done even if another state's manifest form is used.
   - Copy 4—TSD facility keeps this copy
   - Copy 5—TSD facility sends this copy to the generator
   - Copy 6—Transporter keeps this copy

As a reference, Appendix C includes an example of a blank State of Wisconsin Uniform Hazardous Waste Manifest; the general instructions for correctly completing the manifest;

and, in the abbreviations for container types needed to complete Item No. 12 on the manifest. In addition, Appendix D contains a manifest log to record manifest information.

4.5 Certificates of Destruction

The TSD will send the Project Manager a Certificate of Destruction for each hazardous waste stream once final destruction or treatment has occurred. The Project Manager will keep the Certificates of Destruction in the project files.

4.6 Waste Minimization

RCRA 3002(b) requires LQGs to establish a waste minimization plan to reduce the volume or quantity and toxicity of generated hazardous waste to the extent economically practicable. Section 1003 (b), 42 U.S.C. 6902 (b) further states:

"The Congress hereby declares it to be the national policy of the United States that, wherever feasible, the generation of hazardous waste is to be reduced or eliminated as expeditiously as possible. Waste that is nevertheless generated should be treated, stored, or disposed of so as to minimize the present and future threat to human health and the environment."

The goal of this remedial action, which is described in the Record of Decision (ROD) dated September 29, 1998, is to reduce contamination of soil and groundwater at the site in order to protect human health and the environment. The waste being generated at the site is remediation waste and is not manufactured onsite or the by-product of any process currently being conducted onsite. The volume of material in the subsurface is finite and does not have a continuing source. Therefore, a Waste Minimization Plan will not be required for the remediation waste generated at the site.

4.7 Inspection

As part of routine operation and maintenance activities, the Site Operator will inspect the hazardous waste containers, tanks, and storage areas weekly and keep a log of these inspections. The accumulation drums and free product tank will be inspected for leaks, deterioration, corrosion, or structural fatigue. The Site Operator's observations will be recorded on the inspection log found in Appendix D. The log will be kept in a binder at the site and maintained on file for a minimum of 3 years.

Any observations requiring corrective action will be brought to the attention of the Project Manager and will be addressed in a timely manner.

4.8 Pretransport Requirements

Shipment of hazardous waste must be performed by a licensed hazardous waste transporter, which will be verified prior to shipping waste.

Per 49 CFR 172.506 and 40 CFR 262.33, the generator is required to offer the licensed hazardous waste transporter the required placards for the material being shipped, unless the vehicle is already properly placarded. Therefore, before the transporter leaves the site

with the hazardous waste for disposal, the vehicle is inspected to ensure the proper placards are displayed. If the proper placards are not present, four of the required placards will be provided to the transporter.

4.9 Reporting

Per Wisconsin Administrative Code NR 615.11 and 610.08, LQG and SQG are required to submit an annual report for summarizing hazardous waste activities for the previous year. The project manager will prepare the report and submit to the WDNR by March 1 of each year. This report is required for both LQGs and SQGs. SQGs are exempt from reporting details of their waste minimization programs.

5 Waste Handling Procedures

5.1 Carbon

The groundwater treatment system utilizes a 2,500-lb and two 10,000-lb liquid granular activated carbon (LGAC) vessels, connected in series, as the primary treatment process for groundwater. In addition, the groundwater treatment system utilizes a smaller vessel partially filled with LGAC to provide filtration of solids. Since the carbon has been in contact with a listed hazardous waste (that is, constituents in the groundwater), the spent carbon is considered to be a listed hazardous waste.

Carbon is considered spent when it no longer serves the purpose for which it was produced without processing (that is, ability to effectively remove organic compounds). Analytical data collected from the primary LGAC vessel effluent determines the need for replacing the treatment system's primary LGAC vessel. The carbon in the LGAC vessels will be handled in the following manner:

1. After an LGAC vessel is taken out of service, it will be drained. The free liquid from the vessel will be gravity-drained, collected in the 2,500-gallon containment tank, and pumped into the groundwater manifold immediately after the treatment system is restarted.
2. The LGAC will be removed and placed in DOT-approved, lined supersacks.
3. The DOT-approved, lined supersacks will be sealed and appropriately labeled and placed in a designated central accumulation area (see Figure 1) until it is shipped offsite.

The DOT-approved lined supersacks will be labeled with a completed hazardous waste label and a Class 9 placard. An example of the proper way to complete the hazardous waste label for LGAC can be found in Appendix E.

The spent carbon that is taken out of service is sent to the appropriate TSD facility for disposal by a licensed hazardous waste transporter within the allowable accumulation time limit. The accumulation time will be dependent upon the facility's generator status. Accumulation times and requirements are listed in the "Accumulation Standards" section of this document. The Accumulation Start Date is considered to be the day when the spent LGAC is placed in the DOT-approved, lined supersacks.

The receiving TSD facility must approve the waste profile prior to the disposal of the spent carbon. The profile information for this waste stream can be found in Appendix E. The profiles are valid through the date on the existing profile, and must be updated or renewed prior to expiration.

In addition, it is required that a completed manifest and a copy of the "Notification of Waste Subject to Land Disposal Restriction" form accompany the shipment to the TSD facility. An example of the proper way to complete a Wisconsin manifest form can be found in Appendix E.

5.2 Bag Filter

Bag filters are used in line prior to the LGAC vessels to collect particulate matter. The bag filters are considered spent and require replacement when there is a reduction of flow indicated by elevated pressure readings. Since the filters have been in contact with a listed hazardous waste (that is, constituents in the groundwater), the spent bag filters are considered to be a listed hazardous waste. The procedure for replacing and disposing of the spent bag filters is described below.

1. Remove the spent bag filter from its housing and carefully pour the free liquid into the Purge Water Drum (55-gallon poly drum installed with a sump pump piped directly to the system influent).
2. Place the spent bag filter into the 55-gallon drainage drum equipped with a lockable open-head funnel screen lid (replaces regular drum lid). The drainage drum is set on a spill containment pad and is labeled with "Drainage Drum" and "Hazardous Waste." The funnel screen lid on the drainage drum will remain closed except while adding or removing bag filters or pumping water to the headworks of the groundwater treatment system.
3. During the next site visit, remove the spent bag filter from the drainage drum with the lockable open-head funnel screen lid and place it in the designated satellite accumulation drum (see Figure 1).
4. The water collected in the drainage drum equipped with the lockable open-head funnel screen lid will be pumped into the groundwater manifold, as needed, using a small submersible pump.

The satellite accumulation drum will be properly labeled with "Hazardous Waste" using a paint pen. The satellite accumulation drum may also contain personal protective equipment (PPE) as described below; therefore, the drum will be characterized as "Miscellaneous Debris."

When the satellite accumulation drum is full, it must be sealed, labeled, and moved to the central accumulation area (see Figure 1) within 3 days. The drum must be labeled with a completed hazardous waste label and a Class 9 label prior to transport. An example of the proper way to complete a hazardous waste label for spent bag filters can be found in Appendix F.

The drums will be shipped by a licensed hazardous waste transporter to the TSD facility within the allowable accumulation time limit. The accumulation time will be dependent upon the generator status on the facility. Accumulation times and requirements are listed in the "Accumulation Standards" section of this document. The Accumulation Start Date is considered to be the day when the satellite accumulation drum is filled or a partially full drum is taken out of service.

The receiving TSD facility is required to approve the waste profile prior to disposing of the bag filters. The profile information for this waste stream can be found in Appendix F. The profiles are valid through the date indicated on the existing profile, and must be updated or renewed prior to expiration.

In addition, it is required that a completed manifest and a copy of the "Land Restriction Notification" form accompany the shipment to the TSD facility. An example of the proper way to complete a Wisconsin manifest form can be found in Appendix F.

5.3 Liquid Nonaqueous Phase Liquid

Recovery of LNAPL from the subsurface is one component of the groundwater treatment system. The recovered LNAPL is a No.2 fuel oil with 5- to 7-percent PCP and a flash point greater than 200°F. The National Fire Protection Association (NFPA) defines the recovered free product from the site as Class IIIB combustible liquid.

LNAPL is pumped from the extraction wells using pneumatic pumps directly into an 8,000-gallon, double-walled, aboveground, steel tank. The tank is equipped with an ultrasonic level sensor to monitor the level in the tank and a leak detection system to detect a release of LNAPL from the inner tank (that is, it monitors the interstitial space). In addition, piping to the storage tank has secondary containment (that is, a double-walled pipe). The tank is considered a central accumulation area for LNAPL (see Figure 1). The tank is labeled with a hazardous waste label as shown in Appendix A.

The Accumulation Start Date is considered to be the day when the first drop of LNAPL is placed in the tank. The tank is to be emptied within the allowable accumulation time limit. The accumulation time will be dependent upon the generator status on the facility. Accumulation times and requirements are listed in Section 3—Accumulation Standards section of this document.

Prior to the accumulation time running out, the TSD facility will be contacted to empty the tank. The LNAPL is transferred directly to a vacuum truck by the transporter. Tank transport vehicles shall not be left unattended during loading and unloading of the LNAPL.

The receiving TSD facility is required to approve the waste profile prior to disposing of the LNAPL. The profile information for this waste stream can be found in Appendix G. The profiles are valid through the date indicated on the existing profile, and must be updated or renewed prior to expiration.

In addition, it is required that a completed manifest and a copy of the "Land Restriction Notification" form accompany the shipment to the TSD facility. An example of the proper way to complete a Wisconsin manifest form can be found in Appendix G.

5.4 Groundwater

Extracted groundwater is regulated by the site's draft Substantive Requirements of a Wisconsin Pollutant Discharge Elimination System (WPDES) discharge permit (per s. 289.01(33) Stats.). Draft permit number WI-0061531-01-0 allows the site to discharge treated water to the onsite infiltration basin. Water from the bag filter vessels, organoclay and carbon vessels, drums, buckets, etc., must be managed as a hazardous waste. Water from these sources will be pumped back into the groundwater manifold for treatment.

5.5 Filter Cake

The groundwater treatment system influent (that is, extracted groundwater and subnatant of the OWS) is pretreated to remove emulsified oil prior to treatment with the activated carbon. The pretreatment consists of the addition of a coagulant (ferric sulfate) and flocculent (anionic polymer) prior to treatment with a dissolved air flotation (DAF) unit. The material floated to the water surface in the DAF is skimmed off and dewatered using a RDVF. The drum of the RDVF is coated with filter aid media (that is, diatomaceous earth) and is rotated through the float material. A vacuum is applied to the drum to draw water through the filter aid media and into the drum and solids accumulate on the surface of the diatomaceous earth. A variable-speed knife advances inward to the drum and removes the solids from the drum's surface. The solids (that is, filter cake) fall down a shoot and into a dumpster. The dumpster is labeled with a magnetic hazardous waste label as shown in Appendix A.

The Accumulation Start Date is considered to be the day when the first drop of filter cake is added to the dumpster. The dumpster is to be emptied within the allowable accumulation time limit. The accumulation time will be dependent upon the generator status on the facility. Accumulation times and requirements are listed in Section 3 Accumulation Standards section of this document.

Before the accumulation time runs out, the TSD facility will be contacted to pick the dumpster and replace it with an empty dumpster. A cover will be placed over the dumpster except while operating the RDVF and filter cake is being added to the dumpster.

The receiving TSD facility is required to approve the waste profile prior to disposing of the filter cake. The profile information for this waste stream can be found in Appendix H. The profiles are valid through the date indicated on the existing profile and must be updated or renewed prior to expiration.

In addition, it is required that a completed manifest and a copy of the "Land Restriction Notification" form accompany the shipment to the TSD facility. An example of the proper way to complete a manifest form can be found in Appendix H.

5.6 Investigation-Derived Waste

The waste materials generated during sampling events are referred to as investigation-derived wastes (IDW). IDW results from field activities including sampling and decontamination processes. Some of the waste materials may be classified as hazardous waste and must be properly disposed of in accordance with USEPA regulations.

The handling procedures for the IDW materials generated at the site are described below.

5.6.1 Samples

The proper disposal of unused portions of the samples shall be the responsibility of the laboratory. Unused portions of the sample shall not be returned to the site, USEPA, WDNR, or CH2M HILL.

5.6.2 Personal Protective Equipment and Disposable Equipment

PPE includes disposable coveralls, gloves, booties, respirator canisters, etc. Disposable equipment includes plastic ground and equipment covers, bailers, broken or unused sample containers, sample container boxes, tape, disposable towels, etc. PPE or disposable equipment will require decontamination. Following decontamination, the decontaminated PPE or disposable equipment will be disposed of with the other solid waste from the facility. Handling and storage requirements for decontamination fluids are presented in this document.

Any PPE or disposable equipment that has come in direct contact with the nonaqueous phase liquid (NAPL) and that cannot be adequately decontaminated will be placed in the satellite accumulation drum along with the bag filters.

Any PPE or disposable equipment that has not come in direct contact with the untreated groundwater will be disposed of as solid waste into the facility dumpster.

5.6.3 Decontamination Fluids

Decontamination fluids shall be added to the Purge Water Drum, located in the pretreatment building, to be pumped into the groundwater treatment system.

5.6.4 Purge Water

All purge water will be added to the Purge Water Drum to be pumped into the groundwater treatment system.

All IDW will be contained in the appropriate device (drums, tanks, etc.) and will be segregated according to waste type (solid or liquid, corrosive or flammable, etc.). IDW containers will be labeled for onsite storage and offsite disposal, as appropriate (49 CFR 172).

5.7 Oil

As specified in 40 CFR Part 279 and NR 590, used oil that will be recycled is not subject to the hazardous waste regulatory program. Used oil generated at PWP as part of the routine maintenance procedures must be collected and stored in a portable container until it can be taken to an appropriate recycling facility. In addition, used oil from PWP's system equipment is not considered a hazardous waste since it does not come in contact with any of the constituents considered to be a listed hazardous waste. The words "Used Oil" will be clearly written on the outside of the container.

6 Personnel Training Plan

6.1 Overview and General Requirements

As required by NR 630 and per 40 CFR 262.34(a)(4) and 265.16, this training plan has been developed to provide personnel with the information needed to perform tasks involving the storage, management, and handling of hazardous wastes at the site, and to effectively respond to an emergency situation. This training plan was developed in accordance with the RCRA training requirements for large quantity generators.

This training plan provides:

- The job titles for each position at the facility related to hazardous waste management and the name of the employee filling each job (see Appendix J—Roster)
- A written description of the type and amount of both introductory and continuing training that will be given to each person filling a relevant position
- Records that document that the training or job experience required has been completed by the personnel

Training records must be kept on current personnel until closure of the facility.

All personnel involved in handling or managing hazardous waste at the site will receive training as specified in this plan. All employees with responsibilities for emergency response must be knowledgeable of the procedures detailed in Section 7—Preparedness and Prevention and Section 8—Contingency Plan of this Waste Handling Plan.

6.2 Personnel Responsibilities

This section provides written job descriptions for each position related to hazardous waste management at the site. All personnel should be familiar with Section 7—Preparedness and Prevention and Section 8—Contingency Plan and be able to identify emergency situations and respond properly.

For the purpose of this training plan, the categories of job descriptions and functions of site personnel are as described in the following subsections.

6.2.1 Facility Operator

The facility operator directly handles hazardous waste and is directly involved in hazardous waste management. The facility operator is required to have successfully completed the 40-hour Occupational Safety and Health Administration (OSHA) hazardous waste operations and emergency response (HAZWOPER) training in accordance with 29 CFR 1910.120 and maintained compliance with the 8-hour annual refresher requirement.

Generally, the facility operator is responsible for the following:

- Understanding the RCRA requirements and specific hazardous waste management procedures for the waste onsite as described in this Waste Handling Plan
- Performing and maintaining documentation of the inventory and inspection of waste and containers by completing the operation logs found in Appendix D
- Completing the necessary documentation (i.e., manifesting, labeling, etc.) and packaging of the waste for disposal per the procedures outlined in this Waste Handling Plan
- Selecting and using the appropriate PPE
- Ensuring the proper use, maintenance, and inspection of the emergency response equipment
- Ensuring the proper use, maintenance, and inspection of the spill control equipment
- Ensuring that all training is documented and that documentation is available at the site for review

6.2.2 Owner

The owner or its chosen representative is responsible for the following:

- Reviewing and giving approval of all waste handling activities
- Monitoring compliance of all waste handling activities
- Confirming that the site roster is maintained onsite
- Ensuring that offsite waste handling records are reviewed and maintained
- Ensuring that onsite contractors' training records meet site requirements
- Reviewing and approving the updated information in the Waste Handling Plan, as needed

6.2.3 Project Manager

The Project Manager is responsible for managing the facility operators and is required to have successfully completed the 40-hour OSHA HAZWOPER training in accordance with 29 CFR 1910.120 and maintained compliance with the 8-hour annual refresher requirement. Generally, the Project Manager is responsible for the following:

- Providing the necessary initial and annual training to personnel as outlined in this section
- Ensuring facility operators have completed the personnel training and the necessary documentation is completed
- Reviewing and maintaining offsite operation and maintenance records
- Providing updates to the Waste Handling Plan for the owner's review and approval as needed
- Maintaining site roster for owner's review and approval

6.3 Implementation of the Training Program

All personnel performing activities at the site involving the handling and/or management of hazardous waste will be required to participate in the personnel training, to have successfully completed the 40-hour OSHA HAZWOPER training, and to have maintained compliance with the 8-hour annual refresher requirement. Personnel training at the site consists of an Initial Training and Annual Review Training.

6.3.1 Initial Training

Personnel must complete the initial training within 30 days of starting hazardous waste handling-related activities. As part of the initial training, personnel are required to read, in its entirety, the Waste Handling Plan. The initial training will familiarize personnel with emergency procedures, emergency equipment, and emergency systems. The training will include the following, as appropriate:

- Identify operations that generate hazardous waste and the chemical characteristics of the waste
- Identify location of the emergency response equipment (i.e., fire extinguishers)
- Identify location of the spill control equipment
- Identify location of the map to the hospital
- Identify location of the material safety data sheets (MSDSs)
- Review emergency equipment as presented in Section 7—Preparedness and Prevention
- Review emergency procedures as presented in Section 8—Contingency Plan
- Review procedures for shutdown of the system presented in the Operation and Maintenance (O&M) Manual
- Review proper container packaging, marking, labeling, and documentation for waste as presented in the Waste Handling Plan
- Review procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment
- Review key parameters for automatic waste feed cut-off systems
- Identify communications or alarm systems
- Respond to fires or explosions
- Respond to groundwater contamination incidents
- Shutdown operations

6.3.2 Annual Review Training

Facility personnel must take part in an annual review of the topics covered during the initial training program.

6.3.3 Training Documentation

The most current version of this training plan will be maintained onsite. Updates of this plan may be required as a result of the changes involving regulation, waste type, operations, techniques, equipment, or the facility-specific emergency contingency plan procedures.

The Project Manager is required to document the training upon completion of the initial training and the annual review. The Project Manager will complete the training records in Appendix I, which include the following:

- Job title for each position at the facility related to hazardous waste management, and the name of the employee filling each position
- Written job description for each position at the facility related to hazardous waste management, including requisite skill, education or other qualifications, and duties of facility personnel assigned to each position
- Written description of the type and amount of introductory and continuing training that will be given to each person filling a job related to hazardous waste management
- Records that document the training or job experience has been given to and completed by required personnel

Individuals who are not involved in handling hazardous waste are not required to complete the training outlined in this plan. When such individuals visit the site, these personnel shall not be involved in the handling of hazardous waste unless they have completed the training outlined in this plan.

7 Preparedness and Prevention Plan

Large quantity generators must meet the preparedness and prevention requirements in 40 CFR 265 Subpart C. The facility must be maintained and operated to minimize the possibility of a fire, explosion, and unplanned sudden or non-sudden release of hazardous waste. This plan outlines the available emergency equipment located onsite and management procedures for fire prevention.

Per 40 CFR 264.32(b), a communications device is required to be available for contacting outside agencies for emergency assistance. In addition, 40 CFR 264.34(b), requires that if just one employee is on the premises, the employee must have immediate access to a device capable of summoning outside help. A telephone in the control room has direct dial numbers to contact local emergency assistance from offsite in case of emergencies.

Per 40 CFR 264.35, a facility is required to maintain sufficient aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to areas of the facility during an emergency. Aisle space in each area is sufficient for unobstructed movement of emergency personnel and equipment.

7.1 Prevention Procedures, Structures, and Equipment

Proper management and precautions are necessary to prevent the ignition of waste onsite. Ignitable waste at the facility includes free product recovered from the subsurface. The NFPA defines the recovered free product from the site as shown in Table 7-1.

TABLE 7-1
NFPA Classification of Recovered Free Product
Penta Wood Products Site

Recovery Area	Flashpoint	NFPA Class
Corrective Action Management Unit	>200°F	Class IIIB combustible liquid

Note: Classifications are based upon NFPA 30 Section 1.7.

Additional information on the characteristics of the recovered free product is provided in Section 5.3 of this Waste Handling Plan. The recovered free product is stored outside in a double-walled 8,000-gallon tank. The tank is equipped with heat tracing and insulation to prevent the LNAPL and any water from freezing.

No sources of ignition will be allowed near the storage tank or within the building when ignitable items are stored. Potential sources of ignition to be prohibited include open flames, smoking, cutting and welding, hot surfaces, frictional heat, and sparks (static, electrical, or mechanical). "No Smoking" signs are placed throughout the building.

Free product/water recovered from the subsurface is pumped directly into a closed lid, oil water separator located in the treatment building. Oil is skimmed off, stored in an internal collection chamber and the water flows over a weir and pumped to the equalization tank. Once filled, the oil collection chamber is automatically emptied by a pump which sends the free product to the outside 8,000-gallon storage tank. The free product is pumped out of the storage tank into bulk transport trucks for disposal. All containers holding ignitable wastes will be located at least 50 feet from the facility property line.

To prevent overflow, the process controls for the free-product recovery system are designed and operated to perform shutdown of the free-product recovery pumps when the storage tank is full or there is a high water alarm in the oil water separator tank. If a high-level alarm is triggered, the product recovery pumps are shut down.

7.1.1 Fire Control Equipment

Both the pretreatment and treatment buildings are equipped with 10-lb, Class ABC portable fire extinguishers located at every exit. The fire extinguishers are inspected and maintained per the manufacturer's instructions.

Water is supplied from a well to the building. The primary function of the facility water system is to supply water for process use. The domestic water is available during a fire; however, there are no fire hose connections within the building.

7.1.2 Spill Control Equipment

Spill response equipment including absorbent pads, socks and booms, loose absorbent material, drums and other containers, as well as personal protective equipment, are located in the treatment room.

7.1.3 Personal Protective Equipment

In addition, a supply of PPE including Tyvek coveralls, booties, and gloves, are available in the treatment room.

7.1.4 First Aid

A fully stocked first aid kit is provided in the control room to provide first aid for minor injuries.

8 Contingency Plan

The Contingency Plan, prepared in accordance with the RCRA requirements, describes how site personnel will respond to a fire, explosion, or any unplanned sudden or other release of the hazardous waste stored onsite as well as for incidental releases or spills. This Contingency Plan will be reviewed and amended if changes occur in the design, construction, operation, maintenance, or other areas of the system or building in a way that increases the potential for fires, explosions, or releases of hazardous waste, or changes the response necessary in an emergency.

8.1 Response Personnel

An emergency coordinator is responsible for coordinating emergency response measures and being familiar with the following:

- This Contingency Plan
- The hazardous waste operations and activities at the site
- The location of hazardous waste records within the building
- The facility layout
- The locations of hazardous waste activities and characteristics of hazardous waste handled at the site

In addition, persons qualified to act as the emergency coordinator have the authority to commit the necessary resources to implement this Contingency Plan. Persons qualified to act as the emergency coordinator, as required by 40 CFR 264.55, and contact information are provided in Table 8-1 and posted next to the telephone in the control room.

TABLE 8-1
Emergency Coordinator Contact Information
Penta Wood Products Site

Mary Wicklund/OMI 8682 Daniels 70 Siren, WI 54872 Office: (715) 349-8357 Home: (715) 463-3419	Bill Andrae/CH2M HILL 135 South 84th Street, Suite 325 Milwaukee, WI 53214 Office: (414) 847-0341 Cell: (262) 366-0968

8.2 Implementation

The provisions of this Contingency Plan will be implemented immediately whenever there is an emergency event (e.g., a fire, an explosion, or a natural occurrence that involves or threatens the hazardous waste stored onsite) that could threaten human health or the environment. A description of emergency and spill response equipment in the building is provided in Section 7—Preparedness and Prevention Plan of this Waste Handling Plan.

8.2.1 Fire and Explosions

In the event of a fire or explosion, the first person to become aware of an incident shall assess the incident. Both fire fighting and evacuation are possible options in an emergency situation. If the fire involves an explosion or if the fire is so large that it cannot be extinguished with the equipment at hand, the personnel involved shall evacuate the building through the closest exit and proceed outside immediately to an upwind assembly point.

The local fire department, emergency coordinator, project manager, and owner representative should be summoned immediately. If any emergency appears to involve hazardous materials, the hazardous materials (HAZMAT) response team will be called to the scene. The Webster Fire Department will respond as the HAZMAT response team for Burnett County and can respond, identify, and contain releases. If additional support is needed, the Webster Fire Department will call in the Superior Fire Department.

8.2.2 Spills

In the event of a spill, the first person to become aware of an incident shall assess the incident and contact the emergency coordinator and the project manager.

The following actions will be taken in the event of spills:

1. The immediate area will be evacuated.
2. The number and type of entry team and procedures to be utilized will be based upon the site Health and Safety Plan, with special attention to the following:
   - Buddy system
   - Appropriate PPE
   - Monitoring equipment
   - Exposure time limitations
3. The spill will be contained in the smallest area possible using clay absorbent (or equivalent) and berms.
4. The leak will be repaired or plugged, if possible.
5. The release area will be decontaminated.
6. For container spills, container contents will be removed, if necessary, and material transferred to a new container. Material released to the secondary containment systems will be either pumped out of the containment system into new containers or absorbed using compatible absorbent materials such as pillows, socks, or granules.

7. Equipment and clothing will be decontaminated as directed by the site Health and Safety Plan, as applicable.
8. Decontamination solutions will be containerized and treated in the system.
9. Absorbent material will be placed into DOT-approved containers, labeled appropriately, and stored in the accumulation storage area pending shipment offsite to the proper disposal facility.

8.3 Coordination Agreements

The emergency response agencies that may be contacted for emergency response actions were notified of activities at the Penta Wood site and provided information as appropriate. Site tours were offered and completed, if requested by the agency. The following agencies were contacted:

1. Siren Police Department
2. Siren Volunteer Fire Department
3. Burnett County Sheriff
4. Burnett Medical Center
5. Burnett County Emergency Coordinator
6. North Ambulance
7. WDNR Webster Ranger Station
8. Webster Fire Department
9. Superior Fire Department

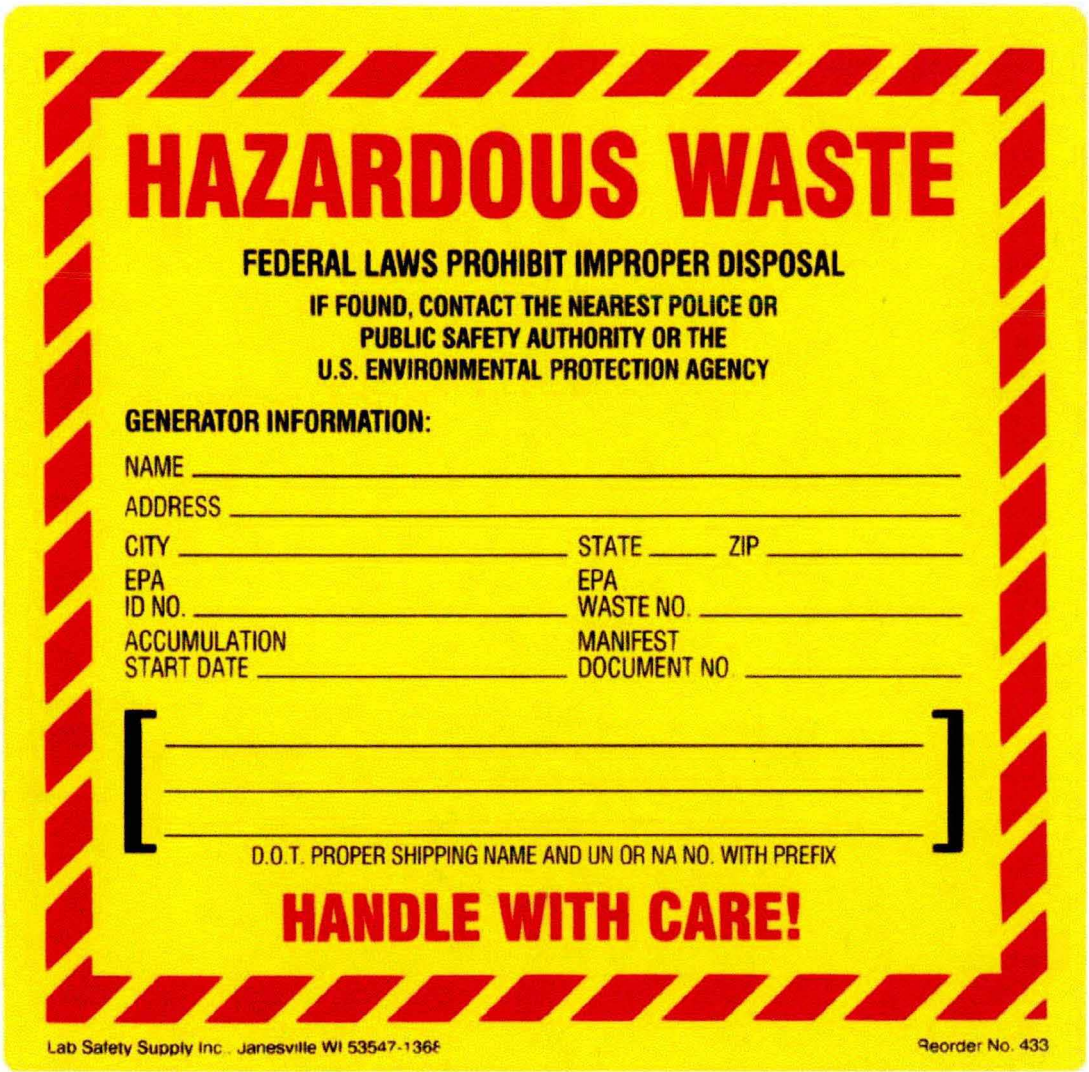
8.4 Reporting Obligations

Within fifteen (15) days after an incident requiring implementation of the contingency plan, the owner or operator must submit a written report on the incident to the WDNR which includes the following:

- Name, address, and telephone number of owner/operator
- Name, address, and telephone number of the facility
- Date, time, and type of incident, such as fire or explosion
- Name and quantity of materials involved
- Extent of injuries, if any
- An assessment of actual or potential hazards to human health or the environment, where this is applicable
- Estimated quantity and disposition of recovered material that resulted from the incident
- A narrative describing the known or suspected causes of the incident and a statement describing the measures taken to investigate the cause. The narrative shall also describe any necessary measures which have been or shall be taken to prevent incidents in the future
- Any amendments to the contingency plan as required by NR 630.22 (1) (b) and (c)

The owner/operator shall notify the department and appropriate local authorities that in the affected areas of the facility, no waste that may be incompatible with the discharged material is treated, stored, or disposed of until cleanup procedures are completed, and all emergency equipment listed in the contingency plan is clean and fit for its intended use before operations are resumed.

Appendix A
Blank Hazardous Waste Label



Example of Blank Hazardous Waste Label

Appendix B
Blank Nonhazardous Waste Label

Example of Non-Hazardous Waste Label

Appendix C

Blank Uniform Hazardous Waste Manifest Forms and Instructions

TABLE C-1
Types of Containers

Abbreviation	Description
DM	Metal drums, barrels, kegs
DW	Wooden drums, barrels, kegs
DF	Fiberboard or plastic drums, barrels, kegs
TP	Tanks portable
TT	Cargo tanks (tank trucks)
TC	Tank cars
DT	Dump truck
CY	Cylinders
CM	Metal boxes, cartons, cases (including roll-offs)
CW	Wooden boxes, cartons, cases
CF	Fiber or plastic boxes, cartons, cases
BA	Burlap, cloth, paper, or plastic bag

SEE INSTRUCTIONS ON REVERSE SIDE OF COPY 6.

STATE OF WISCONSIN
Chapter 291, Wis. Stats.
Form 4400-66P Rev. 1-99

ALL COPIES MUST BE LEGIBLE, PLEASE TYPE

State of Wisconsin
Department of Natural Resources
Bureau of Waste Management
Box 8094
Madison, WI 53708

FOR DNR USE ONLY

Form designed for use on elite (12-pitch) typewriter.

Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.
Manifest Document No.
2. Page 1 of
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Site Location If Different
4. Generator's Phone ( )

A. State Manifest Document Number WI K363452
B. State Generator's ID

5. Transporter 1 Company Name
6. US EPA ID Number
C. State Transporter's ID
D. Transporter's Phone

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
10. US EPA ID Number
G. State Facility's ID
H. Facility's Phone

GENERATOR

11. US DOT Description *(Including Proper Shipping Name, Hazard Class, and ID Number)*	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.					
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above
K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

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 governmental regulations and according to the requirements of the Wisconsin Department of Natural Resources. If I am a large quantity generator, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment;

OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name & Position Title | Signature | Date (Month Day Year)

TRANSPORTER

17. TRANSPORTER 1 Acknowledgement of Receipt of Materials
Printed/Typed Name & Position Title | Signature | Date (Month Day Year)

18. TRANSPORTER 2 Acknowledgement of Receipt of Materials
Printed/Typed Name & Position Title | Signature | Date (Month Day Year)

FACILITY

19. Discrepancy Indication Space

20. FACILITY OWNER OR OPERATOR: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name & Position Title | Signature | Date (Month Day Year)

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

Copy Distribution:
1 — Generator send to Wis. DNR
2 — Generator retain
3 — Facility send to Wis. DNR
4 — Facility retain
5 — Facility send to Generator
6 — Transporter retain
Copies 1 & 3 mail to Wis. DNR at above address.

Emergency 24 Hour Assistance and Spill Reporting
Telephone Number: (800) 943-0003

COPY 1 - GENERATOR SEND TO WI DNR

Example of Blank Wisconsin Uniform Hazardous Waste Manifest

Use of this form is mandatory underss. 291.21, 291.23 and 291.25, Wis.Stats. Penalty for failure to comply: up to $25,000 forfeiture. Penalty for making intentional false statements or representations: up to $25,000 fine or one year in jail, or both. Higher penalties apply to second and subsequent violations. Personally identifiable information requests in this form is not intended to be used for any other purposes other than those for which it is originally collected.

I. INSTRUCTIONS FOR COMPLETION BY GENERATOR (SHIPPER)

A. General Responsibilities

1. Complete items 1-16, as well as D, F, H, and I in Shaded Area. Items J and K are optional.
2. Sign and date item 16 prior to shipment of waste.
3. Remove Copies 1 and 2 after items 15 and 17 are completed by carrier/driver.
4. Mail Copy 1 to address indicated on top of manifest form, within five (5) working days, and retain Copy 2 for company records.

B. Specific Instructions

Item 1 — Enter the company's US EPA (12-digit) ID number and an unique 5-digit number assigned to this manifest (e.g., 00001).

Item 2 — This will always read Page 1 of 1.

Item 3 — Enter company's name and address where manifests will be held/filed. You may also enter location where shipment originated.

Item 4 — Telephone number where an authorized agent of the company may be contacted.

Item 5 — Enter the company name of the first transporter of the waste shipment.

Item 6 — Enter US EPA (12-digit) ID number of first transporter identified in item 5.

Item 7 — If applicable, enter company name of the second transporter of waste. If more than two transporters are used, you must use a second manifest Form 4400-66.

Item 8 — If applicable, enter US EPA (12-digit) ID number of second transporter identified in item 7.

Item 9 — Enter company name and site address of the facility designated to receive the waste listed on this manifest.

Item 10 — Enter US EPA (12-digit) ID number of facility in item 9.

Item 11 — Enter the US DOT Proper Shipping Name, Hazard Class, and ID number (UN/NA) for each waste as identified in 49-CFR 171-177. "Note: If additional space is needed (e.g., more than 4 wastes) you must/shall use another (second) manifest Form 4400-66."

Item 12 — Enter the number of containers for each waste and the appropriate abbreviation from the table (below) for Type of Container.

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

Item 13 — Enter the total quantity of waste described on each line (one per line only).

Item 14 — Enter the appropriate abbreviation from the table (below) for the Unit of Measure. Use only one unit of measure for each waste amount.

G — Gallons (liquids only)	L — Liters (liquids only)
P — Pounds	K — Kilograms
T — Tons (2,000 lbs.)	M — Metric tons (1,000 kg)
Y — Cubic yards	N — Cubic meters

Item I — WASTE NUMBER — Enter the appropriate Hazardous Waste number for each separate waste shipped as identified in EPA regulations 40 CFR Part 261 or Chapter NR 605, Wis. Adm. Code. Additional waste numbers may be listed in Box J.

Item 15 — If applicable, generators must provide Alternate TSD Facility information including: US EPA ID number, company name, address, and provide space for the signature and date of acceptance of the waste.

Item 16 — A generator representative must read, sign and date the Certification Statement.

II. INSTRUCTIONS FOR COMPLETION BY TRANSPORTER/CARRIER

A. General Responsibilities

1. Sign item 17.
2. If the load is to be transferred to another carrier, ensure items 7, 8 and 18 are completed at the time of the transfer.
3. Deliver all manifested waste to the specified destination.
4. Obtain the signature and information required in item 19 and 20, upon delivery to the waste facility.
5. Retain Copy 6 for your records and give Copies 3-5 to the facility operator.

B. Specific Instructions

Item 17 — Enter the name and title of the person accepting the waste on behalf of the first transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 18 — Transporter 2 — If applicable, enter the name and title of the person accepting the waste on behalf of the second transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

III. INSTRUCTIONS FOR COMPLETION BY THE HAZARDOUS WASTE FACILITY

A. General Responsibilities

1. Verify the waste and quantities listed on the manifest.
2. Complete items 19 and 20 upon acceptance of waste shipment and give Copy 6 to carrier.
3. Mail Copy 3 to address indicated on top of manifest form, within five (5) working days.
4. Mail Copy 5 and any attachments to the generator address (Item 3 given on the manifest), within 30 days.
5. Retain Copy 4 for your company records.

B. Specific Instructions

Item 19 — The authorized representative of the designated (or alternative) facility's owner or operator must note in this space any significant discrepancy between the waste described on the manifest and the waste actually received at the facility.

Item 20 — Facility owner or operator must print the name of the person and title accepting the waste on behalf of the facility. That person must acknowledge acceptance of waste described on the manifest by signing and entering the date of receipt.

Example of Instructions For Wisconsin
Uniform Hazardous Waste Manifest

Appendix D
Manifest and Inspection Logs

INSPECTION LOG—FREE PRODUCT STORAGE TANK
Penta Wood Products Site
Siren, Wisconsin
EPA # WID006176945

Date	Time	Inspector	Comments	Correction Action Taken	Date of Corrective Action

Note:

1. Inspect weekly.
2. Items to check for:
   - Check for proper labels, material weight, and storage date
   - Check for leakage or ballooning
   - Check for signs of corrosion on drums
   - Check for sufficient aisle space and clearance
3. Retain this form on file for three years.

INSPECTION LOG—HAZARDOUS WASTE DRUM STORAGE
Penta Wood Products Site
Siren, WI
EPA # WID006176945

Date	Time	Inspector	Comments	Correction Action Taken	Date of Corrective Action

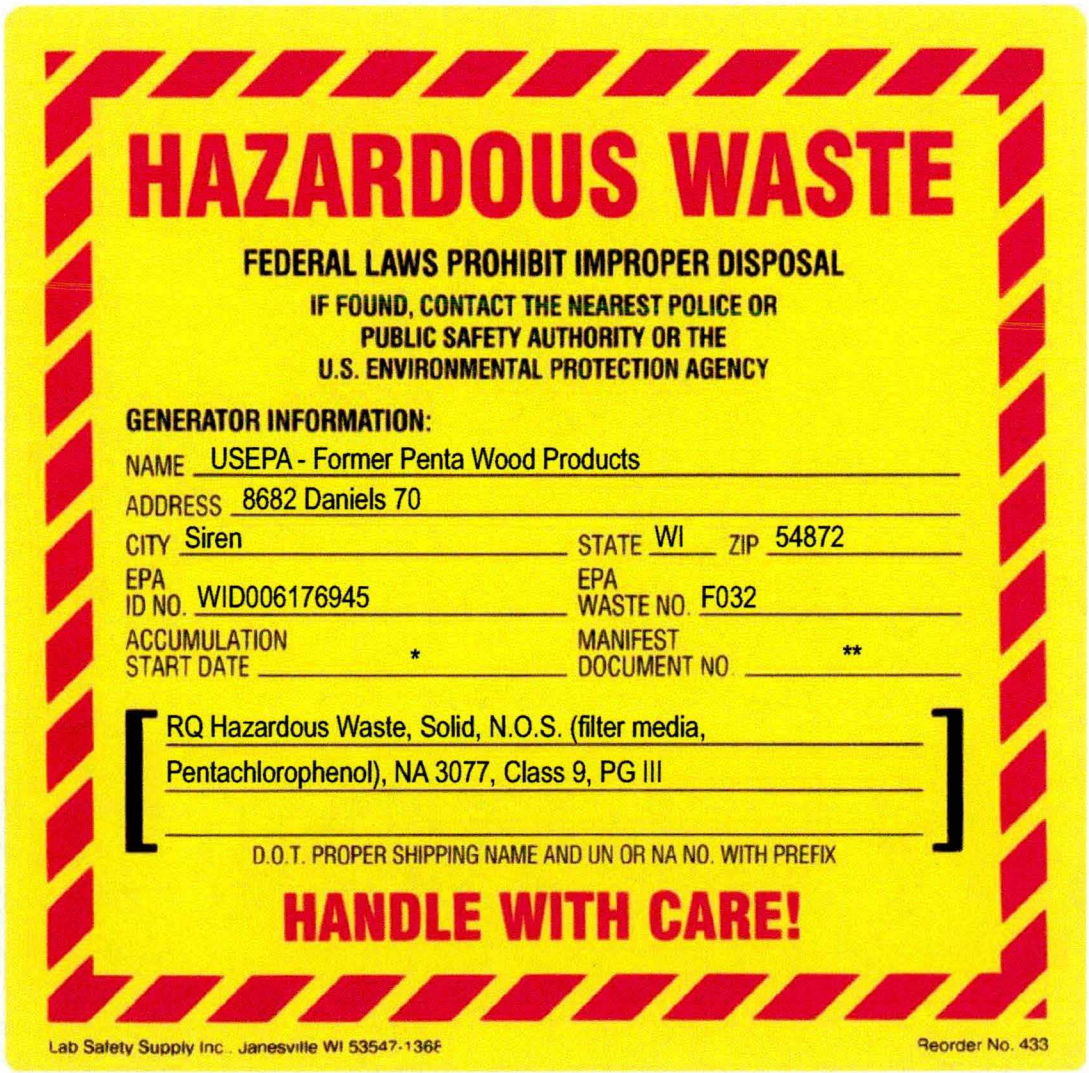
Note:

1. Inspect weekly.
2. Items to check for:
   - Check for proper labels, material weight, and storage date
   - Check for leakage or ballooning
   - Check for signs of corrosion on drums
   - Check for sufficient aisle space and clearance
3. Retain this form on file for three years.

MANIFEST LOG
Penta Wood Products Site
Siren, Wisconsin
EPA # WID006176945

Accumulation Start Date	Shipping Date	Manifest Document Number	State Manifest Document Number	Receipt Date of TSD Signed Manifest	Waste Stream

Appendix E
Label, Profile Information, and Manifest for Carbon



* Accumulation start date is the date the carbon is placed in the super sack.

** Manifest Document No. is found in Item 1 on the corresponding completed manifest.

Example of Hazardous Waste Label for Carbon

APPENDIX E

Carbon Profile Information

Generator Information	USEPA - Former Penta Wood Products Site 8682 Daniels 70 Siren, WI 54872
Generator USEPA/Federal ID #	WID006176945
Name of the Waste	Spent Carbon
Process Generating Waste	Spent carbon from remediation of pentachlorophenol contaminated site
Constituents	Carbon 100% Pentachlorophenol 0 to 5%
Physical State	Solid, no free liquids
Number of Phases	1
Odor	None
Flash Point	
pH	4.0 to 10.0
Specific Gravity	
DOT Shipping Name	Hazardous Waste, Solid, N.O.S.
DOT Hazard Class	9
UN/NA #	NA 3077
Packing Group	III
Container Description	1.6 yard supersack

SEE INSTRUCTIONS ON REVERSE SIDE OF COPY 6.

STATE OF WISCONSIN
Chapter 291, Wis. Stats.
Form 4400-66P Rev. 1-99

ALL COPIES MUST BE LEGIBLE, PLEASE TYPE

State of Wisconsin
Department of Natural Resources
Bureau of Waste Management
Box 8094
Madison, WI 53708

FOR DNR USE ONLY

Form designed for use on elite (12-pitch) typewriter.

Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: WID006176945
Manifest Document No.:
2. Page 1 of
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
USEPA - Former Penta Wood Products c/o CH2M HILL
135 S 84th St, Milwaukee, WI 53214
4. Generator's Phone (414) 272-2426

Site Location If Different
8682 Daniels 70
Siren, WI 54872

A. State Manifest Document Number: WI K363452
B. State Generator's ID: N/A

5. Transporter 1 Company Name
6. US EPA ID Number
C. State Transporter's ID
D. Transporter's Phone

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
10. US EPA ID Number
G. State Facility's ID
H. Facility's Phone

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ Hazardous Waste, Solid, N.O.S. (filter media, Pentachlorophenol) NA 3077, Class 9, PG III, (F032)		BA			F032
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above: F027 in Wisconsin only

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

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 governmental regulations and according to the requirements of the Wisconsin Department of Natural Resources. If I am a large quantity generator, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment;

OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR

Printed/Typed Name & Position Title | Signature | Date (Month Day Year)

TRANSPORTER

17. TRANSPORTER 1 Acknowledgement of Receipt of Materials
Printed/Typed Name & Position Title | Signature | Date (Month Day Year)

18. TRANSPORTER 2 Acknowledgement of Receipt of Materials
Printed/Typed Name & Position Title | Signature | Date (Month Day Year)

FACILITY

19. Discrepancy Indication Space

20. FACILITY OWNER OR OPERATOR: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name & Position Title | Signature | Date (Month Day Year)

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

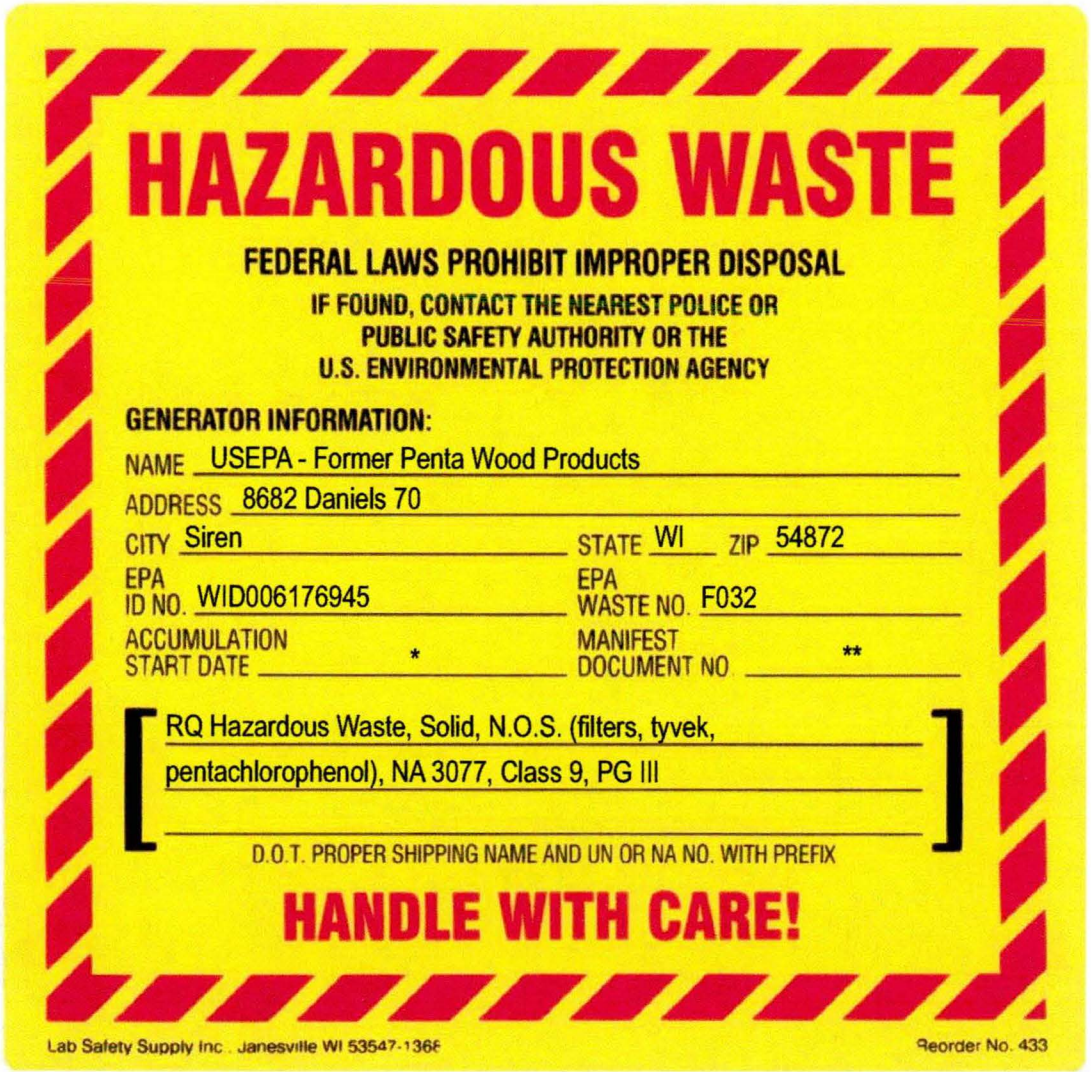
Copy Distribution:
1 — Generator send to Wis. DNR
2 — Generator retain
3 — Facility send to Wis. DNR
4 — Facility retain
5 — Facility send to Generator
6 — Transporter retain
Copies 1 & 3 mail to Wis. DNR at above address.

Emergency 24 Hour Assistance
and Spill Reporting
Telephone Number: (800) 943-0003

COPY 1 - GENERATOR SEND TO WI DNR

Example of Wisconsin Manifest for Carbon

Appendix F
Label, Profile Information, and Manifest for Miscellaneous Debris



* Accumulation start date is the date when the satellite accumulation drum is full or sealed and taken out of service.

** Manifest Document No. is found in Item 1 on the corresponding completed manifest.

Example of Hazardous Waste Label
for Miscellaneous Debris

APPENDIX F

Miscellaneous Debris Profile Information

Generator Information	USEPA - Former Penta Wood Products Site 8682 Daniels 70 Siren, WI 54872
Generator USEPA/Federal ID #	WID006176945
Name of the Waste	Debris
Process Generating Waste	PPE, tape, wood and debris generated during remediation of pentachlorophenol contaminated site
Constituents	PPE, gloves, tape, wood, debris (100%)
Physical State	Solid, no free liquids
Number of Phases	1
Odor	None
Flash Point	
pH	
Specific Gravity	
DOT Shipping Name	Hazardous Waste, Solid, N.O.S.
DOT Hazard Class	9
UN/NA #	NA 3077
Packing Group	III
Container Description	55-gallon steel drum

SEE INSTRUCTIONS ON REVERSE SIDE OF COPY 6.

STATE OF WISCONSIN
Chapter 291, Wis. Stats.
Form 4400-66P Rev. 1-99

ALL COPIES MUST BE LEGIBLE, PLEASE TYPE

State of Wisconsin
Department of Natural Resources
Bureau of Waste Management
Box 8094
Madison, WI 53708

FOR DNR USE ONLY

Form designed for use on elite (12-pitch) typewriter.

Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. WID006176945
Manifest Document No.
2. Page 1 of
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
USEPA - Former Penta Wood Products c/o CH2M HILL
135 S 84th St, Milwaukee, WI 53214
4. Generator's Phone (414) 272-2426

Site Location If Different
8682 Daniels 70
Siren, WI 54872

A. State Manifest Document Number WI K363452
B. State Generator's ID N/A

5. Transporter 1 Company Name
6. US EPA ID Number
C. State Transporter's ID
D. Transporter's Phone

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
10. US EPA ID Number
G. State Facility's ID
H. Facility's Phone

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ Hazardous Waste Solid, N.O.S. (filters, tyvek, Pentachlorophenol) NA 3077, Class 9, PG III		DM			F032
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above
F027 in Wisconsin only

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

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 governmental regulations and according to the requirements of the Wisconsin Department of Natural Resources. If I am a large quantity generator, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment;

OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR

Printed/Typed Name & Position Title | Signature | Date (Month Day Year)

TRANSPORTER

17. TRANSPORTER 1 Acknowledgement of Receipt of Materials
Printed/Typed Name & Position Title | Signature | Date (Month Day Year)

18. TRANSPORTER 2 Acknowledgement of Receipt of Materials
Printed/Typed Name & Position Title | Signature | Date (Month Day Year)

FACILITY

19. Discrepancy Indication Space

20. FACILITY OWNER OR OPERATOR: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name & Position Title | Signature | Date (Month Day Year)

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

Copy Distribution:
1 — Generator send to Wis. DNR
2 — Generator retain
3 — Facility send to Wis. DNR
4 — Facility retain
5 — Facility send to Generator
6 — Transporter retain
Copies 1 & 3 mail to Wis. DNR at above address.

Emergency 24 Hour Assistance and Spill Reporting
Telephone Number: (800) 943-0003

COPY 1 - GENERATOR SEND TO WI DNR

Example of Wisconsin Manifest for Miscelleanous Debris

Appendix G

Profile Information and Manifest for LNAPL

APPENDIX G

LNAPL Profile Information

Generator Information	USEPA - Former Penta Wood Products Site 8682 Daniels 70 Siren, WI 54872
Generator USEPA/Federal ID #	WID006176945
Name of the Waste	Recovered LNAPL
Process Generating Waste	Recovered No. 2 fuel oil recovered from remediation of pentachlorophenol contaminated site
Constituents	#2 Fuel Oil 90 to 95% Pentachlorophenol 5 to 7% Water 0 to 2%
Physical State	Liquids, no solids
Number of Phases	2
Odor	Mild
Flash Point	>200° F
pH	4.0 to 10.0
Specific Gravity	0.8 – 1.0
DOT Shipping Name	Hazardous Waste, Liquid, N.O.S.
DOT Hazard Class	9
UN/NA #	NA 3082
Packing Group	III
Container Description	Bulk liquid in vacuum truck from storage tank onsite

SEE INSTRUCTIONS ON REVERSE SIDE OF COPY 6.

STATE OF WISCONSIN
Chapter 291, Wis. Stats.
Form 4400-66P Rev. 1-99

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State of Wisconsin
Department of Natural Resources
Bureau of Waste Management
Box 8094
Madison, WI 53708

FOR DNR USE ONLY

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Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: WID006176945
Manifest Document No.:
2. Page 1 of
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
USEPA - Former Penta Wood Products c/o CH2M HILL
135 S 84th St, Milwaukee, WI 53214
4. Generator's Phone (414) 272-2426

Site Location If Different
8682 Daniels 70
Siren, WI 54872

A. State Manifest Document Number: WI K363452
B. State Generator's ID: N/A

5. Transporter 1 Company Name
6. US EPA ID Number
C. State Transporter's ID
D. Transporter's Phone

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
10. US EPA ID Number
G. State Facility's ID
H. Facility's Phone

GENERATOR

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ Hazardous Waste, Liquid, N.O.S. (Fuel Oil, pentachlorophenol) NA 3082, Class 9, PG III (F032)					F032
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above: F027 in Wisconsin only
K. Handling Codes for Wastes Listed Above:

15. Special Handling Instructions and Additional Information

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 governmental regulations and according to the requirements of the Wisconsin Department of Natural Resources. If I am a large quantity generator, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment;

OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name & Position Title | Signature | Date (Month Day Year)

TRANSPORTER

17. TRANSPORTER 1 Acknowledgement of Receipt of Materials
Printed/Typed Name & Position Title | Signature | Date (Month Day Year)

18. TRANSPORTER 2 Acknowledgement of Receipt of Materials
Printed/Typed Name & Position Title | Signature | Date (Month Day Year)

FACILITY

19. Discrepancy Indication Space

20. FACILITY OWNER OR OPERATOR: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name & Position Title | Signature | Date (Month Day Year)

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

Copy Distribution:
1 — Generator send to Wis. DNR
2 — Generator retain
3 — Facility send to Wis. DNR
4 — Facility retain
5 — Facility send to Generator
6 — Transporter retain
Copies 1 & 3 mail to Wis. DNR at above address.

Emergency 24 Hour Assistance and Spill Reporting
Telephone Number: (800) 943-0003

COPY 1 - GENERATOR SEND TO WI DNR

Example of Wisconsin Manifest for LNAPL

Appendix H

Profile Information and Manifest for Filter Cake

APPENDIX H

Filter Cake Profile Information

Generator Information	USEPA - Former Penta Wood Products Site 8682 Daniels 70 Siren, WI 54872
Generator USEPA/Federal ID #	WID006176945
Name of the Waste	Filter Cake
Process Generating Waste	Dewatered sludge from wastewater treatment system for remediation of pentachlorophenol contaminated site
Constituents	Water 60 - 65% Sludge with up to 5% pentachlorophenol 35 to 40%
Physical State	Sludge
Number of Phases	1
Odor	Mild
Flash Point	None
pH	4.0 to 10.0
Specific Gravity	
DOT Shipping Name	Hazardous Waste, Solid, N.O.S.
DOT Hazard Class	9
UN/NA #	NA 3077
Packing Group	III
Container Description	Cubic yard or modified roll-off boxes

SEE INSTRUCTIONS ON REVERSE SIDE OF COPY 6.

STATE OF WISCONSIN
Chapter 291, Wis. Stats.
Form 4400-66P Rev. 1-99

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Department of Natural Resources
Bureau of Waste Management
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UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: WID006176945
Manifest Document No.:
2. Page 1 of
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
USEPA - Former Penta Wood Products c/o CH2M HILL
135 S 84th St, Milwaukee, WI 53214
4. Generator's Phone (414) 272-2426

Site Location If Different
8682 Daniels 70
Siren, WI 54872

A. State Manifest Document Number: WI K363452
B. State Generator's ID: N/A

5. Transporter 1 Company Name
6. US EPA ID Number
C. State Transporter's ID
D. Transporter's Phone

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
10. US EPA ID Number
G. State Facility's ID
H. Facility's Phone

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ Hazardous Waste Solid, N.O.S. (Diatomaceous Earth, Pentachlorophenol) NA 3077, Class 9, PG III (F032)					F032
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above
F027 in Wisconsin only

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

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 governmental regulations and according to the requirements of the Wisconsin Department of Natural Resources. If I am a large quantity generator, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment;

OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR

Printed/Typed Name & Position Title | Signature | Date (Month Day Year)

TRANSPORTER

17. TRANSPORTER 1 Acknowledgement of Receipt of Materials
Printed/Typed Name & Position Title | Signature | Date (Month Day Year)

18. TRANSPORTER 2 Acknowledgement of Receipt of Materials
Printed/Typed Name & Position Title | Signature | Date (Month Day Year)

FACILITY

19. Discrepancy Indication Space

20. FACILITY OWNER OR OPERATOR: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name & Position Title | Signature | Date (Month Day Year)

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

Copy Distribution:
1 — Generator send to Wis. DNR
2 — Generator retain
3 — Facility send to Wis. DNR
Copies 1 & 3 mail to Wis. DNR at above address.
4 — Facility retain
5 — Facility send to Generator
6 — Transporter retain

Emergency 24 Hour Assistance
and Spill Reporting
Telephone Number: (800) 943-0003

COPY 1 - GENERATOR SEND TO WI DNR

Example of Wisconsin Manifest for Filter Cake

Appendix I
Training Records

Initial Training
Facility Personnel Signoff Form

- Facility personnel listed below have received the Initial Training.
- Facility personnel were provided with a copy of this *Waste Handling Plan,* have read and understood it, and agree to abide by its provisions.

Project Name: Penta Woods Products Site **Project Number:** 184202

PERSONNEL NAME (Please print)	PERSONNEL SIGNATURE	COMPANY	INITIAL TRAINING COMPLETION DATE

Annual Review Training
Facility Personnel Signoff Form

- Facility personnel listed below have completed the Annual Review Training
- Facility personnel were provided with a copy of this *Waste Handling Plan,* have read and understood it, and agree to abide by its provisions.

Project Name: Penta Woods Products Site **Project Number:** 184202

PERSONNEL NAME (Please print)	PERSONNEL SIGNATURE	COMPANY	ANNUAL REVIEW COMPLETION DATE

Appendix J
Roster

APPENDIX J

Roster

Position	Name	Address
Owner's Representative	Tom Williams	U.S. EPA Region 5 SR-6J 77 West Jackson Blvd. Chicago, IL 60604-3507 (312) 886-6157
Project Manager	Bill Andrae	CH2M HILL 135 South 84th Street, Suite 325 Milwaukee, WI 53214-1456 (414)847-0341
Facility Operator	Mary Wicklund	CH2M HILL 8682 Daniels 70 Siren, WI 54872 (715) 349-8357