NATURAL RESOURCE TECHNOLOGY
ENVIRONMENTAL CONSULTANTS

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Mr. Peter Ramanauskas
USEPA Region 5 PCB Staff
77 W. Jackson Blvd
Chicago, IL 60604

February 11, 2014
(2095)

RE: **Cleanup Completion Report – Building Concrete Walls, Pits and TSCA Level Concrete**
Former Wabash Alloys Facility
9100 S. Fifth Avenue, Oak Creek, Wisconsin

Dear Mr. Ramanauskas,

On behalf of Connell Aluminum Properties, LLC (CAP), Natural Resource Technology, Inc. (NRT) is submitting this Cleanup Completion Report for the former Wabash Alloys facility in Oak Creek, Wisconsin (Figure 1) under the Self-Implementing Procedure for polychlorinated biphenyl (PCB) remediation waste in accordance with 40 CFR 761.61(a)(3). This report addresses the cleanup of the building concrete walls, pits, and concrete characterized as having Toxic Substance Control Act (TSCA) levels in accordance with the Self-Implementing Procedure Notification and Certification Plan submitted on April 30, 2013 and the approval letter dated May 9, 2013.

CAP has completed the demolition of the building, which had an area of approximately 256,000 square feet (Figure 2). Demolition included removal of poured concrete and concrete block walls that divided the building into work areas, bin walls (8-10 feet high) that were used for sorting materials, and pits (process, machine, and scale) within the manufacturing areas of the building. Table 1 documents disposal of this concrete. A photo log of concrete removal activities is provided in Attachment A.

DEMOLITION METHODS

Prior to removal of the concrete, the walls and TSCA concrete floor areas were marked with spray paint. A color scheme was utilized to assist the demolition contractor in segregating the concrete based on PCB concentrations determined during the sampling plan. The following color scheme was used to mark the floors and walls:

- Red – contained PCB concentrations greater than/equal to 50 mg/kg (TSCA material)
- Pink – contained PCB concentrations less than 50 mg/kg but greater than 5 mg/kg
- Green – contained PCB concentrations equal to/less than 5 mg/kg and greater than/equal to 1 mg/kg
- Blue – contained PCB concentrations less than or equal to 1 mg/kg
- Orange – concrete with PCB containing paint (painted concrete)

A separate category for concrete containing 1 to 5 mg/kg total PCBs was used because the landfill had a price reduction for this category. Figure 3 documents the wall, pit, and floor concrete removal and disposal per the sampling results. Attachment B contains a detailed tracking spreadsheet for each category of concrete.

The contractor used two main pieces of equipment to break up the concrete floor, walls, bins, and pits: a backhoe fitted with a concrete breaker attachment and a concrete processor (hydraulic jaw), also known as a “muncher”. The breaker was mostly used on the floor and pits. The muncher was used on walls, bins and for size reduction and rebar removal.

The contractor began the concrete demolition by removing all TSCA level material in May 2013 and was completed by June 4, 2013. They then proceeded to sort the remaining concrete based on the aforementioned color scheme from June to the end of August. Pit removal also began in June and was completed in August. The total amount of concrete disposed was approximately 5,541 tons.

CONCRETE WALLS & FLOOR (GREATER THAN OR EQUAL TO 50 MG/KG)

Concrete containing total PCB concentrations greater than or equal to 50 mg/kg was disposed at the TSCA waste disposal facility EQ Wayne Disposal in Belleville, Michigan. The concrete floor slab areas that contained TSCA levels are shown on Figure 3 in the Furnace and Crusher Rooms. The concrete wall area that contained TSCA levels is also shown on Figure 3. The TSCA concrete was broken down into 4-feet by 4-feet pieces and smaller and loaded on trucks over several days. Jack Gray and Beelman trucking were contracted by EQ to haul the TSCA material to Wayne Disposal. Since discrete concrete samples for PCBs were previously collected at the boundary of the TSCA material limits, no further verification sampling was conducted on the concrete. However, soil samples were collected below the TSCA concrete floor slab to determine concentration levels in the top 6-inch soil layer. All soil samples were below 1 mg/kg total PCBs (Table 2).

Approximately 307 tons of concrete containing PCB concentrations greater than 50 mg/kg was removed from the site and disposed at the EQ Wayne Disposal Facility.

PAINTED CONCRETE WALLS

White and gray painted solid walls and any adhered painted wall with PCB concentrations greater than 1 mg/kg was disposed as PCB bulk product waste at the Subtitle D landfill, Advanced Disposal's Emerald Park Landfill in Muskego, Wisconsin. Figure 3 shows which walls were disposed of as painted concrete.

Approximately 1,081 tons of painted concrete was removed from the site and disposed at the Emerald Park Landfill.

CONCRETE WALLS & FLOOR (LESS THAN 50 MG/KG TO GREATER THAN 1 MG/KG)

Concrete walls containing total PCBs less than 50 mg/kg and greater than 1 mg/kg, as shown on Figure 3, were disposed of at the Emerald Park local Subtitle D landfill as special waste for beneficial reuse material. The concrete was segregated per the color scheme working from the front of the building to the rear. Segregated piles were then loaded on trucks and hauled to the landfill. The landfill beneficially reused this concrete for haul roads and other approved purposes within the lined portion of the landfill. As stated above, this material was sorted between 1 to 5 mg/kg and 5 to 50 mg/kg total PCBs.

Approximately 3,014 tons of concrete containing PCB concentrations of greater than 1 mg/kg to 5 mg/kg was removed from the site and disposed at the Emerald Park Landfill.

Approximately 1,139 tons of concrete containing PCB concentrations of greater than 5 mg/kg to less than 50 mg/kg was removed from the site and disposed at the Emerald Park Landfill.

CONCRETE WALLS (LESS THAN OR EQUAL TO 1 MG/KG)

Concrete walls that contained total PCB concentrations less than 1 mg/kg were crushed down to less than a foot in diameter using the muncher and stockpiled on the concrete slab on the south end of the Furnace Room. This material may be used as general fill material below final grades, and be covered with pavement, topsoil or other

surface material proposed for the high-occupancy redevelopment if approved by the Wisconsin Department of Natural Resources (WDNR) under a low hazard waste exemption. If not approved, the material will be hauled to the landfill for disposal when work begins on removal of the remaining floor slab.

PIT REMOVAL

A total of 13 process, machine, and scale pits were excavated from below the floor slab and two additional pits were removed from outside the building slab. Pit excavation areas are shown on Figure 3. The following pits were removed:

- Ladle Pits 1 through 7 – process pits in Furnace Room
- Ingot Room Scale Pit – small scale in Ingot Storage Room
- Crusher Scale Pit – small scale in Crusher Room
- Scrap Scale Pit – small scale in Scrap Storage Room
- Rear Pit – former rail track in Scrap Storage Room
- Crusher Pit – scrap metal crushing unit pit in Crusher Room
- Chlorine Pit – pit inside Chlorine Room
- Truck Scale Pit – truck scale on west side of building
- Back Pit – former water treatment plant foundation and pits on east side of the building

The contractor removed each pit by excavating (approximately 1 to 3 feet wide) around each pit wall to reduce mixing of concrete and soil. The concrete breaker broke the walls and floor into manageable pieces except for the crusher pit. The crusher pit's depth required additional excavation around the perimeter of the pit. Soil confirmation samples below the concrete floors of each pit were collected as specified in a work plan submitted to the WDNR, dated February 4, 2013 (Table 2). Excavated soil was stockpiled next to the pit and placed back into the excavation area once all the concrete was removed. After placement of the excavated soils was completed, additional WDNR-approved general fill (Attachment C) was placed in the excavation. The general fill source was native clay material from the Emerald Park Landfill.

PIT LIQUID DISPOSAL

Prior to removal of the process, machine, and scale pits, the pits had to be emptied due to water that had collected in the pits since the plant shutdown. The water appeared to be a mixture of stormwater from leaks in the building roof and potentially groundwater that seeped through cracks in the pit walls. The liquid was sampled and analytical results were provided to Milwaukee Metropolitan Sewage District (MMSD) along with a Notice of Intent to Discharge Wastewater (NOI) form for all pit liquids except for the chlorine pit. MMSD approved the NOI in a letter, dated May 1, 2013 (Attachment D). As a requirement of the NOI, a treatment system was set-up on the site to treat the water prior to discharge into the sanitary sewer due to the potential for PCB contamination. The treatment system consisted of two bag filter units and two 1,000 pound carbon vessels. Approximately 323,160 gallons of treated pit water was discharged to the sanitary sewer (Table 3).

The chlorine pit was managed separately from the other pits as its contents consisted of an oil layer, water and sludge. Attachment B contains detailed tracking spreadsheet for disposal of materials from the chlorine pit. The oil

layer (180 gallons) was vacuumed off the surface and disposed of by North Shore Environmental (North Shore) at Badger Disposal (Table 3). Approximately 20,000 gallons of water was then removed via vacuum trucks and disposed at Emerald Park Landfill via solidification (Table 3). The remaining sludge at the bottom of the pit was treated with sodium hypochlorite (bleach) in the pit to reduce the reactive sulfide concentration from a hazardous characterization to acceptable local landfill levels. Communication with WDNR occurred and a bench study was performed prior to initiating the treatment. Following confirmation of acceptable reactive sulfide level, the treated sludge was then solidified with investigative soil cuttings and saw dust in the pit prior to disposal at Emerald Park Landfill. Approximately 16 tons of sludge was disposed at Emerald Park Landfill (Table 3).

INTERM EROSION CONTROL MEASURES

After removal and backfill of the pits and removal of the above slab concrete, the building slab was cleaned with a sweeper to remove any remaining concrete dust from the demolition process. During the removal of the exterior walls, the contractor attempted to leave approximately 3 to 6 inches of concrete above the floor slab to provide a stormwater containment curb. Where no curb remained, the contractor placed erosion eels to filter storm water as it runs off the slab. The erosion eels will remain in place until the slab is removed (schedule dependent on completion and approvals of the soil remediation plan). The erosion eels are inspected every 2 to 3 weeks by a field engineer to verify that the eels are still in place and are not damaged.

DEVIATIONS FROM REMEDIATION PLAN

The following is a list of deviations from the approved *Self-Implementing Procedure Notification and Certification Plan – Building Concrete Walls, Pits and TSCA Level Concrete*:

- As part of the sampling procedure for the concrete walls, each sample location had the paint removed to collect the sample; however the Ingot and Maintenance rooms and a few interior walls ultimately did not have their paint removed due to time constraints. These walls were field marked and managed as painted concrete rather than based on the analytical data in the submitted plan.
- The samples of the north concrete wall in the furnace room indicated total PCBs less than 1 mg/kg; however, the steel wall above it contained a galbestos coating. Due to the potential PCB cross contamination of galbestos, the wall was disposed at Emerald Park Landfill rather than kept on site for potential reuse as backfill.
- The crusher pit walls were proposed to be removed to the sub-floor (approximately 10 feet below the building slab). Instead, the contractor was able to remove the entire crusher pit (walls, sub-floor and lower floor) which extended as deep as approximately 28 feet below the slab. Entire removal of the pit increased the area of building slab that needed to be removed to provide safe excavation conditions.

Please do not hesitate to contact us should you have any questions or comments regarding this plan.

Sincerely,

NATURAL RESOURCE TECHNOLOGY, INC.

Ricky J. Guenther Jr., PE
Environmental Engineer

Julie A. Zimdars, PE
Senior Engineer

Figures:

Figure 1	Property Location Map
Figure 2	Property Boundary Map
Figure 3	Concrete Wall, Pit and Floor Removal and Disposal

Tables:

Table 1	Concrete Disposal Summary
Table 2	PCB Soil Confirmation Analytical Results
Table 3	Pit Liquids and Waste Disposal Summary

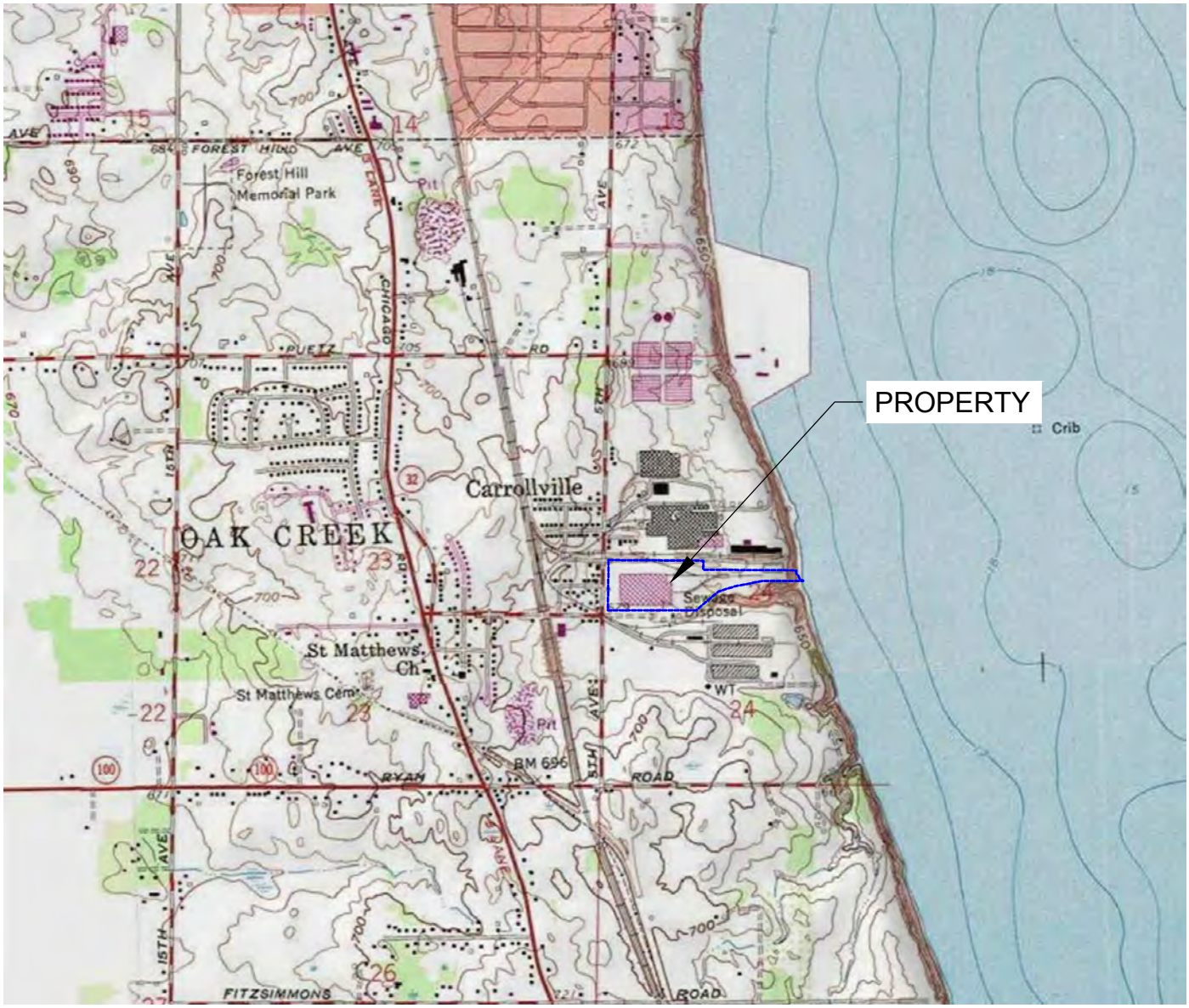
Attachments:

Attachment A	Photo Log
Attachment B	Disposal Tracking Spreadsheets
	B1 – Concrete Disposal
	B2 – Water and Waste Disposal
Attachment C	General Fill Approval Letter
Attachment D	NOI 13.009 & Discharge Summary

cc: Mr. Mike Kellogg, Connell Aluminum Properties, LLC (electronic copy only)
Mr. Eric Amadi, Wisconsin Department of Natural Resources (electronic copy only)

[2095/Reports/EPA 761 Plan Documentation/2095 Cleanup Completion Letter Report]

FIGURES



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0 2000 4000

SCALE IN FEET

CONTOUR INTERVAL 10 FEET

SOURCE:
USA Topo Maps. Copyright:© 2011 National Geographic Society, i-cubed

PROPERTY LOCATION MAP

NATURAL RESOURCE TECHNOLOGY

CLEANUP COMPLETION REPORT
FORMER WABASH ALLOYS
9100 SOUTH 5TH AVENUE
OAK CREEK, WISCONSIN

PROJECT NO.
2095/6.1A

DRAWING NO.
2095-61a-A02C

FIGURE NO.
1

DRAWN: RLH DATE: 01/20/14 CHK'D: RJG DATE: 01/20/14 APP'D: JAZ DATE: 01/20/14

Jan 20, 2014 10:50am PLOTTED BY: rhopkins SAVED BY: rhopkins
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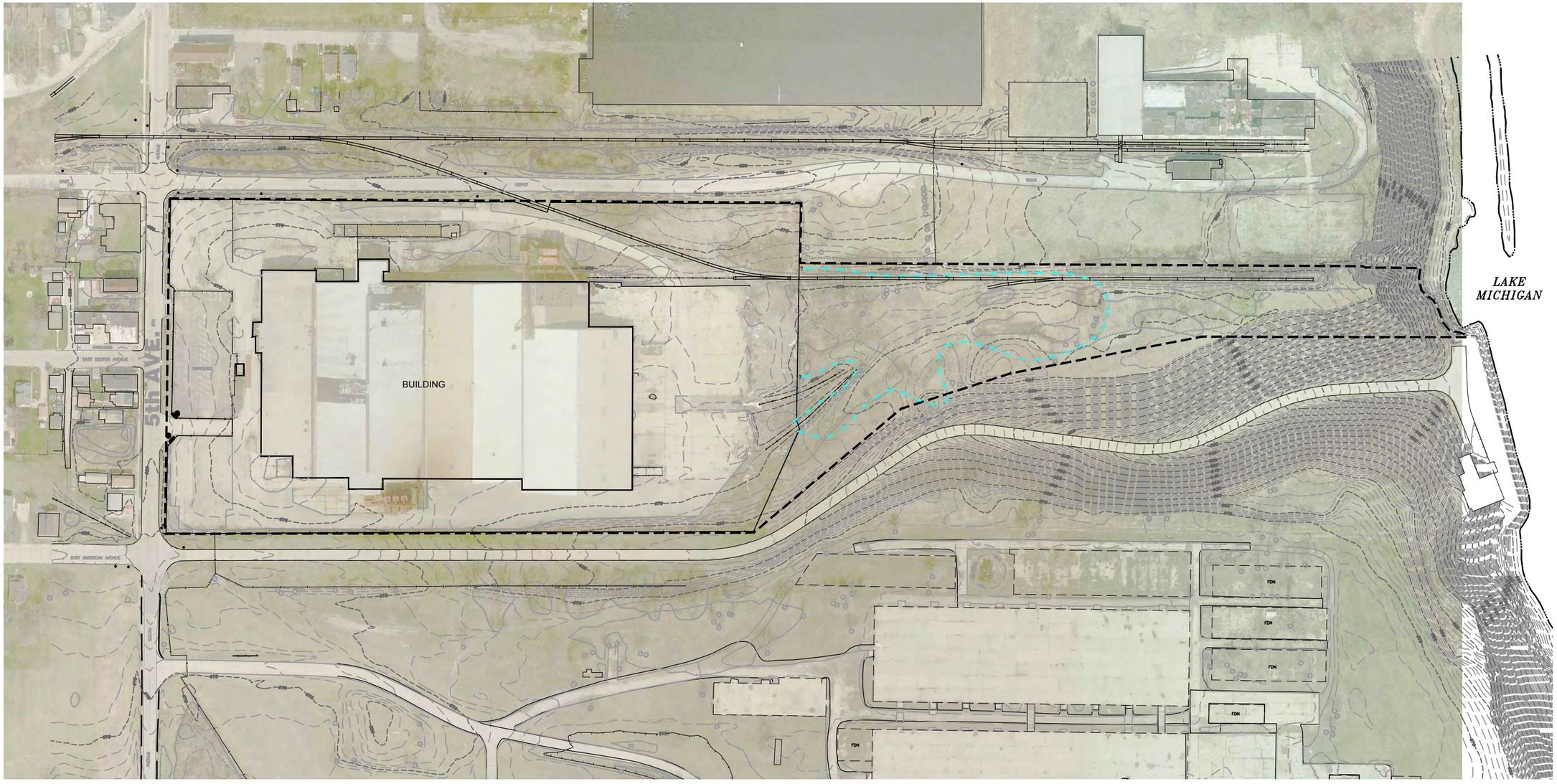

SOURCE NOTES:

1. AERIAL PHOTO FROM MCAMLIS, 2010 HIGH RESOLUTION IMAGERY.
2. TETRA TECH FIGURE 14, EXTENT OF SOIL EXCEEDING INDUSTRIAL DIRECT CONTACT RCL, DATED 2/16/12, 4436D-REVISED-OAK CREEK.DWG.
3. WETLAND BOUNDARY OBTAINED FROM WISCONSIN WETLANDS INVENTORY, DIGITIZED FROM 2005 AERIAL PHOTOGRAPHY.

PROPERTY BOUNDARY MAP

CLEANUP COMPLETION REPORT
FORMER WABASH ALLOYS
9100 SOUTH 5TH AVENUE
OAK CREEK, WISCONSIN

DRAWN BY:	RLH	DATE:	01/20/14
CHECKED BY:	RJG	DATE:	01/20/14
APPROVED BY:	JAZ	DATE:	01/20/14

DRAWING NO: 2095-61a-B02C

REFERENCE: SEE INFO BLOCK

NATURAL RESOURCE TECHNOLOGY

PROJECT NO.
2095/6.1A

FIGURE NO.
2

Jan 20, 2014 10:59am PLOTTED BY: rhopkins SAVED BY: rhopkins
X:\ACAD\Projects\2095\61a-2095-61a-B02C.dwg Layout1
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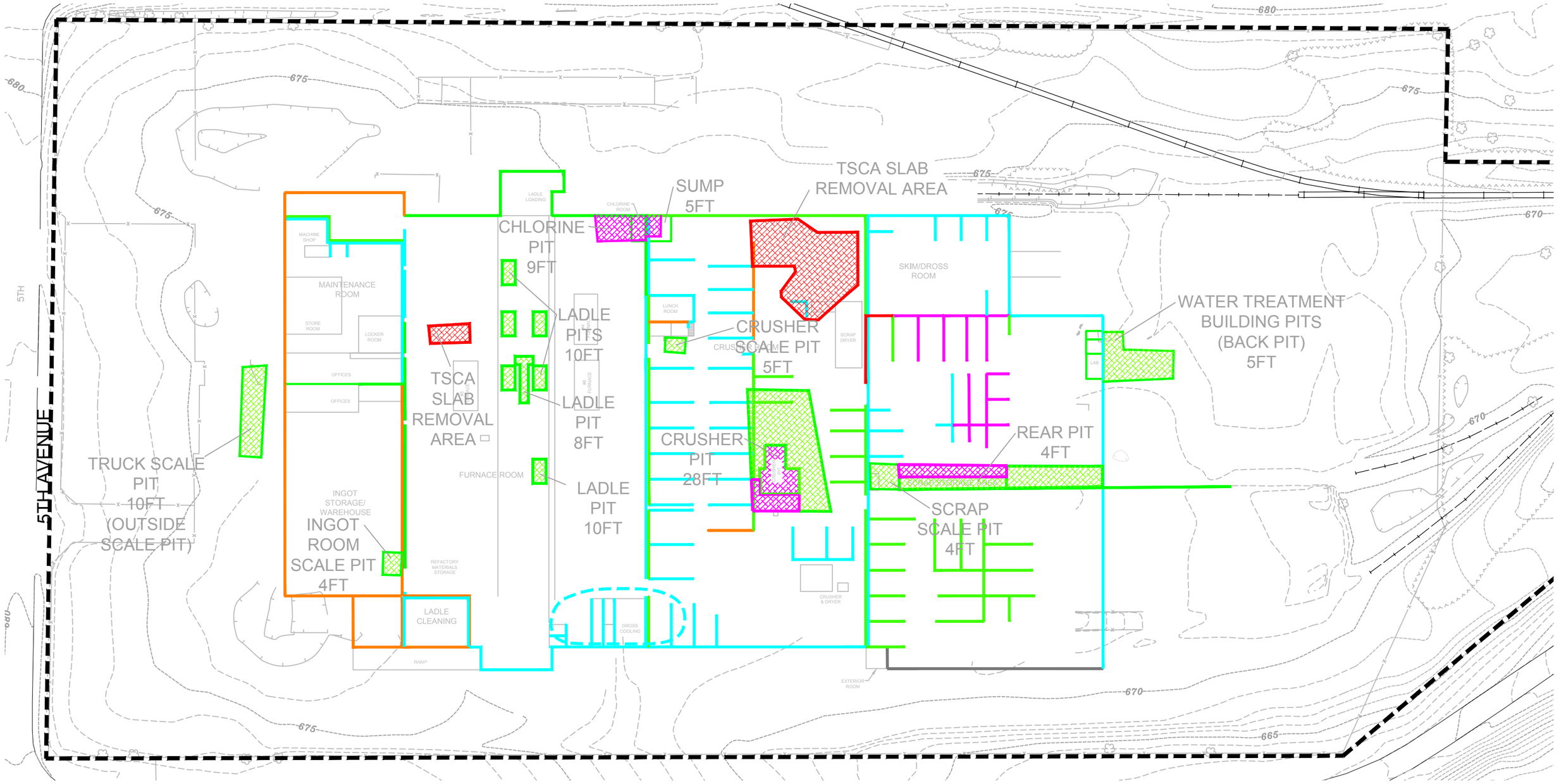

- APPROXIMATE PROPERTY BOUNDARY
- CONCRETE WALL/BIN WALL OR BLOCK WALL ≤ 1 mg/kg PCB (STOCKPILED)
- CONCRETE WALL/BIN WALL (DISPOSED AS 1-5 mg/kg PCB)
- CONCRETE STOCKPILE (≤ 1 mg/kg PCB) (SEE NOTE 3)
- CONCRETE WALL/BIN WALL (DISPOSED AS 5-50 mg/kg PCB)
- CONCRETE WALL (DISPOSED AS TSCA MATERIAL, > 50mg/kg PCB)
- WALL/BIN WALL/BLOCK (DISPOSED AS PAINTED CONCRETE)
- NON-CONCRETE WALL
- CONCRETE FLOOR OR PIT (DISPOSED AS 1-5 mg/kg PCB)
- CONCRETE FLOOR OR PIT (DISPOSED AS 5-50 mg/kg PCB)
- CRUSHER PIT (SEE NOTE 4)
- CONCRETE FLOOR (DISPOSED AS TSCA MATERIAL, > 50mg/kg PCB))

N

0 40 80

SCALE IN FEET

SOURCE NOTES:
1. TETRA TEC FIGURE 14, EXTENT OF SOIL EXCEEDING INDUSTRIAL DIRECT CONTACT RCL, DATED 2/16/12, 4436D-REVISED-OAK CREEK.DWG.
2. RMT FIGURE 4, INTERIOR FLOOR, PAINT, AND WIPE SAMPLING, DATED 8/2/2010, FROM SEGMENT 001 OF PHASE II SITE INVESTIGATION REPORT.
3. TRC FIGURE 3, INTERIOR FLOOR, PAINT, WIPE, AND GRAB SAMPLING, DATED FEBRUARY 2012, FROM REMEDIATION PLAN_FORMER WABASH FACILITY_DRAFT REPORT.

NOTES:

1. PAINTED CONCRETE, 1-5 mg/kg PCB, 5-50 mg/kg PCB CONTAINING CONCRETE WAS DISPOSED OF AT ADVANCED DISPOSAL EMERALD PARK LANDFILL.
2. TSCA CONCRETE DISPOSED OF AT EQ WAYNE DISPOSAL LANDFILL.
3. CONCRETE LESS THAN OR EQUAL TO 1.0 mg/kg PCB IS STOCKPILED ON BUILDING SLAB WITH EROSION EELS ALONG THE PERIMETER OF THE BUILDING SLAB.
4. CRUSHER PIT WALLS ABOVE SUB FLOOR DISPOSED AS 1-5 mg/kg PCB. SUB FLOOR, WALLS BELOW SUB FLOOR, AND BASE DISPOSED OF AS 5-50 mg/kg PCB.

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PROJECT NO. 2095/6.1A	CONCRETE WALL ,BLOCK AND FLOOR WASTE DISPOSAL
DRAWN BY: RLH 02/04/14	CLEANUP COMPLETION REPORT FORMER WABASH ALLOYS 9100 SOUTH 5TH AVENUE OAK CREEK, WISCONSIN
CHECKED BY: RJG 02/04/14	
APPROVED BY: JAZ 02/04/14	DRAWING NO: 2095-61a-B03C REFERENCE: .
	FIGURE NO. 3

TABLES

Table 1. Concrete Disposal Summary

Cleanup Completion Report
Former Wabash Alloys Facility
Oak Creek, Wisconsin

Concrete Description	Volume	Units	Disposal Location
Painted Concrete	1080.9	Tons	Advanced Diposal Emerald Park
Concrete 1 - 5 mg/kg PCB	3013.8	Tons	Advanced Diposal Emerald Park
Concrete 5 - 50 mg/kg PCB	1139.1	Tons	Advanced Diposal Emerald Park
> 50 mg/kg PCB Concrete	307.14	Tons	EQ Wayne Disposal
Total Concrete Disposed	5540.94	Tons	

Table 2. PCB Soil Confirmation Analytical Results

Cleanup Completion Report
Former Wabash Alloys Facility
Oak Creek, Wisconsin

Sample Location	Sample Depth (ft)	Sample Date	PCB, Total (mg/kg) [1]	PCB-1016 (mg/kg) [2]	PCB-1221 (mg/kg) [2]	PCB-1232 (mg/kg) [2]	PCB-1242 (mg/kg) [2]	PCB-1248 (mg/kg) [2]	PCB-1254 (mg/kg) [2]	PCB-1260 (mg/kg) [2]
Non-Industrial Direct Contact			*1.0*	*3.93*	*0.159*	*0.159*	*0.222*	*0.222*	*0.222*	*0.222*
TSCA Limit			**50**	--	--	--	--	--	--	--
Pit Removal Soil Confirmation Samples										
Back Pit	5-6	07/11/13	0.43	< 0.0092	< 0.0079	< 0.0087	< 0.0055	< 0.0066	*0.43*	< 0.003
Chlorine Pit East Base	9-10	08/27/13	< 0.0029	< 0.0089	< 0.0075	< 0.0084	< 0.0053	< 0.0063	< 0.0053	< 0.0029
Chlorine Pit West Base	9-10	08/27/13	< 0.0029	< 0.009	< 0.0076	< 0.0085	< 0.0053	< 0.0064	< 0.0053	< 0.0029
Chlorine Pit Side North	5-8	08/27/13	0.023	< 0.0086	< 0.0073	< 0.0081	< 0.0051	< 0.0061	0.023	< 0.0028
Chlorine Pit Side South	6-8	08/27/13	< 0.0028	< 0.0087	< 0.0074	< 0.0082	< 0.0052	< 0.0062	< 0.0052	< 0.0028
Crusher Pit East	25-26	08/02/13	0.77	0.43	< 0.0075	< 0.0083	< 0.0052	< 0.0063	*0.34*	< 0.0028
Crusher Pit North	23-24	08/02/13	< 0.0028	< 0.0087	< 0.0074	< 0.0082	< 0.0052	< 0.0062	< 0.0052	< 0.0028
Crusher Pit West	28-29	08/02/13	< 0.0028	< 0.0088	< 0.0075	< 0.0083	< 0.0052	< 0.0063	< 0.0052	< 0.0028
Crusher Scale Pit	5-6	07/11/13	*2.4*	< 0.0095	< 0.0081	< 0.009	< 0.0056	*0.99*	*1.4*	< 0.0031
Ingot Room Pit	4-5	07/10/13	0.56	< 0.0098	< 0.0083	< 0.0093	< 0.0058	< 0.007	*0.56*	< 0.0032
Rear Pit East	4-5	08/27/13	0.68	< 0.0093	< 0.0079	< 0.0088	< 0.0055	< 0.0066	*0.56*	0.12
Rear Pit Central	4-5	08/27/13	*2.1*	< 0.0093	< 0.0079	< 0.0088	< 0.0055	< 0.0066	*1.7*	*0.47*
Scrap Scale Pit	4-5	07/11/13	0.025	< 0.0087	< 0.0074	< 0.0083	< 0.0052	< 0.0062	0.025	< 0.0028
Ladle Pit 1	10-11	07/08/13	*3.7*	< 0.018	< 0.015	< 0.017	< 0.011	< 0.013	*3.7*	< 0.0058
Ladle Pit 2	10-11	07/08/13	0.11	< 0.0088	< 0.0075	< 0.0083	< 0.0052	< 0.0063	0.11	< 0.0028
Ladle Pit 3	10-11	07/09/13	0.45	< 0.0088	< 0.0075	< 0.0083	< 0.0052	< 0.0063	*0.45*	< 0.0029
Ladle Pit 4	10-11	07/09/13	< 0.0034	< 0.01	< 0.0089	< 0.0099	< 0.0062	< 0.0075	< 0.0062	< 0.0034
Ladle Pit 5	10-11	07/09/13	0.34	< 0.0092	< 0.0078	< 0.0087	< 0.0055	< 0.0066	*0.34*	< 0.003
Ladle Pit 6	10-11	07/09/13	0.11	< 0.011	< 0.0092	< 0.01	< 0.0064	< 0.0077	0.11	< 0.0035
Ladle Pit 7A	8-9	07/09/13	0.054	< 0.0093	< 0.0079	< 0.0088	< 0.0055	< 0.0067	0.054	< 0.003
Ladle Pit 7B	8-9	07/09/13	0.63	< 0.0092	< 0.0079	< 0.0087	< 0.0055	< 0.0066	*0.63*	< 0.003
Outside Scale Pit A	10-11	07/17/13	0.037	< 0.0092	< 0.0079	< 0.0087	< 0.0055	< 0.0066	0.037	< 0.003
Outside Scale Pit B	10-11	07/17/13	0.0087	< 0.0093	< 0.0079	< 0.0088	< 0.0055	< 0.0067	0.0087	< 0.003

Table 2. PCB Soil Confirmation Analytical Results

Cleanup Completion Report
Former Wabash Alloys Facility
Oak Creek, Wisconsin

Sample Location	Sample Depth (ft)	Sample Date	PCB, Total (mg/kg) (1)	PCB-1016 (mg/kg) (2)	PCB-1221 (mg/kg) (2)	PCB-1232 (mg/kg) (2)	PCB-1242 (mg/kg) (2)	PCB-1248 (mg/kg) (2)	PCB-1254 (mg/kg) (2)	PCB-1260 (mg/kg) (2)
Non-Industrial Direct Contact			*1.0*	*3.93*	*0.159*	*0.159*	*0.222*	*0.222*	*0.222*	*0.222*
TSCA Limit			**50**	--	--	--	--	--	--	--
TSCA Floor Slab Soil Confirmation Samples										
PS01 S6	0-0.5	05/30/13	< 0.0027	< 0.0084	< 0.0072	< 0.008	< 0.005	< 0.0061	< 0.005	< 0.0027
PS01 S7	0-0.5	05/30/13	0.48	< 0.0087	< 0.0074	< 0.0082	< 0.0052	< 0.0062	*0.48*	< 0.0028
PS07 S1	0-0.5	05/30/13	0.46	< 0.0087	< 0.0074	< 0.0082	< 0.0052	< 0.0062	*0.46*	< 0.0028
PS07 S2	0-0.5	05/30/13	< 0.0027	< 0.0082	< 0.007	< 0.0078	< 0.0049	< 0.0059	< 0.0049	< 0.0027
PS08 S3	0-0.5	05/30/13	0.082	< 0.0088	< 0.0075	< 0.0083	< 0.0052	< 0.0063	0.082	< 0.0028
PS08 S4	0-0.5	05/30/13	0.095	< 0.0085	< 0.0072	< 0.008	< 0.005	< 0.0061	0.095	< 0.0027
PS09 S5	0-0.5	05/30/13	0.17	< 0.0087	< 0.0074	< 0.0082	< 0.0051	0.072	0.1	< 0.0028

Original by:RJG 9/23/13, Checked by: JAZ 01/31/14

Notes: (1) High Occupancy Cleanup Level (40 CFR 761.61)
(2) WDNR Non-Industrial Direct Contact Residual Contaminant Level (RCL)

Table 3. Pit Liquids and Waste Disposal Summary

Cleanup Completion Report
Former Wabash Alloys
Connell Aluminum Properties, LLC

Waste Description	Volume	Units	Disposal Method/Location
Pit Water	323,160	Gallons	On-site Treatment/MMSD Sanitary Sewer
Chlorine Pit Water	20,000	Gallons	Solidification/Advanced Disposal Emerald Park
Chlorine Pit Oil	180	Gallons	Badger Disposal
Chlorine Pit Sludge(1)	15.8	Tons	On-site Treatment/Advanced Disposal Emerald Park

Notes:

1. Sludge treated on-site with sodium hypochlorite to reduce reactive sulfide to non-hazardous levels. Following reactive sulfide confirmation, soil cuttings (9 drums) and sawdust was mixed with sludge from the chlorine pit for solidification materials prior to disposal. Contractor estimated that 3.5 tons of the 15.8 tons was the soil cuttings.

ATTACHMENT A

PHOTO LOG

Photo Number: 1
Date of Photo: 5/17/13
Description: Concrete Label Marking based on Sample Results
Creator: RJG

Photo Number: 2
Date of Photo: 5/22/13
Description: TSCA Floor Breaking
Creator: RJG

Photo Number: 3
Date of Photo: 5/23/13
Description: Loading of TSCA Concrete for Transport to EQ
Creator: RJG

Photo Number: 4
Date of Photo: 5/29/13
Description: Soil Beneath TSCA Floor Area
Creator: RJG

Photo Number: 5
Date of Photo: 6/6/13
Description: Removal of Pit Water to Treatment System
Creator: RJG

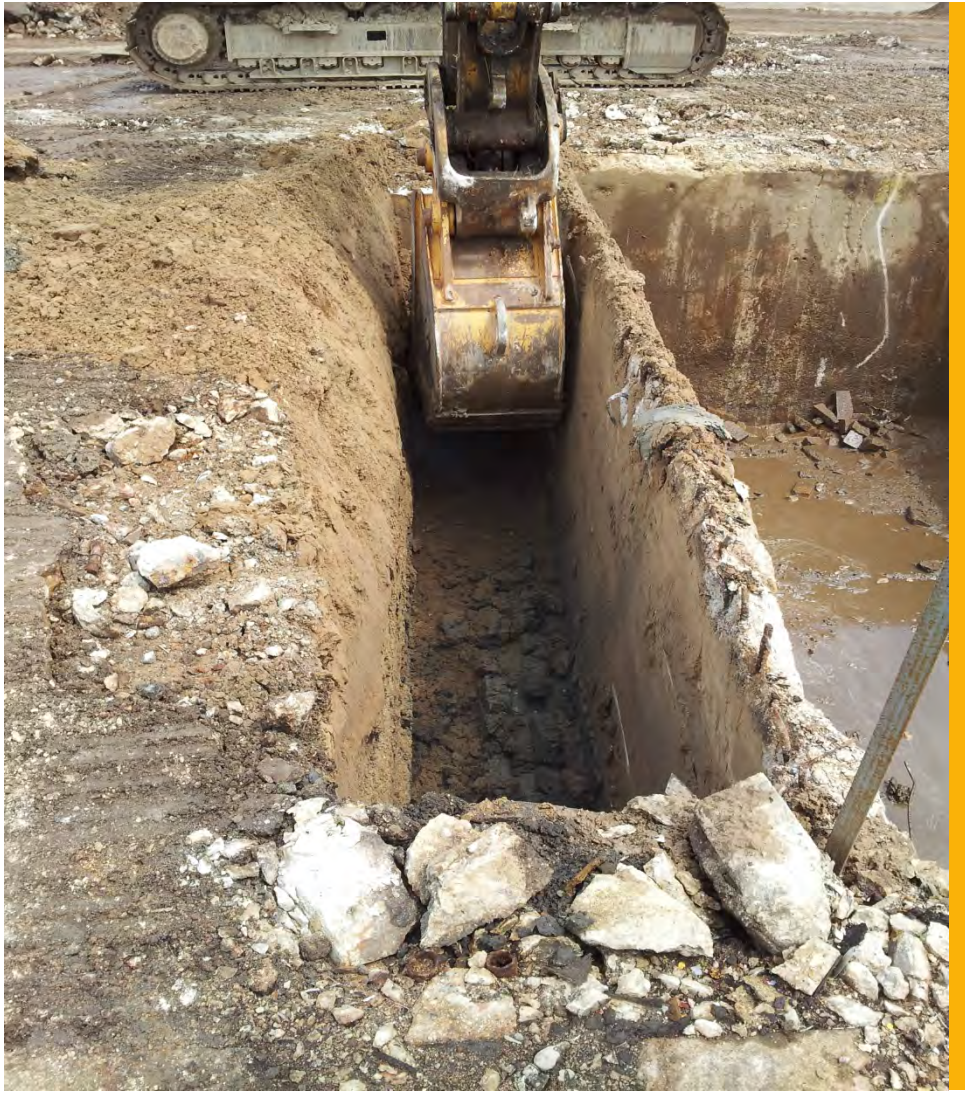

Photo Number: 6
Date of Photo: 7/10/13
Description: Excavation along Pit Wall
Creator: RJG

Photo Number: 7
Date of Photo: 7/10/13
Description: Ladle Pit Removal
Creator: RJG

Photo Number: 8
Date of Photo: 7/10/13
Description: Removed Pit Excavation
Creator: RJG

Photo Number: 9
Date of Photo: 7/15/13
Description: Backfilling Pit Excavations
Creator: RJG

Photo Number: 10
Date of Photo: 7/16/13
Description: Painted Wall “P” Removal
Creator: RJG

Photo Number: 11
Date of Photo: 7/22/13
Description: Muncher Removing Bin Walls
Creator: RJG

Photo Number: 12
Date of Photo: 7/25/13
Description: Floor Removal around Crusher Pit
Creator: RJG

Photo Number: 13
Date of Photo: 8/01/13
Description: Crusher Pit Removal
Creator: RJG

Photo Number: 14
Date of Photo: 9/04/13
Description: Stockpile of less than 1 ppm total PCB Concrete
Creator: RJG

Photo Number: 15
Date of Photo: 9/06/13
Description: Concrete Removal Completion, Erosion Eels (black) shown along edge of building slab
Creator: RJG

ATTACHMENT B

DISPOSAL TRACKING SPREADSHEETS

ATTACHMENT B1

CONCRETE DISPOSAL

Attachment B1. TSCA Building Slab & Wall Concrete Disposal

Former Wabash Alloys
Connell Aluminum Properties, LLC

Waste Stream	Manifest #	Profile #	Qty	Unit	Hauler	Truck #	Disposal Location	Date Shipped	Date Received	Material Description	Material Location
TSCA Level PCB Contaminated Concrete											
TSCA Concrete	010331242JJK	E134083WDI	22.35	TONS	Beelman	3020	Wayne Disposal, Inc.	5/29/2013	5/29/2013	Concrete Floor	Crusher Room
TSCA Concrete	010331243JJK	E134083WDI	22.24	TONS	Jack Gray	647-3	Wayne Disposal, Inc.	5/29/2013	5/29/2013	Concrete Floor	Crusher Room
TSCA Concrete	010331244JJK	E134083WDI	22.68	TONS	Beelman	556	Wayne Disposal, Inc.	5/29/2013	5/29/2013	Concrete Floor	Crusher Room
TSCA Concrete	010331245JJK	E134083WDI	20.37	TONS	Beelman	917	Wayne Disposal, Inc.	5/29/2013	5/29/2013	Concrete Floor	Crusher Room
TSCA Concrete	010331246JJK	E134083WDI	22.05	TONS	Jack Gray	647-20	Wayne Disposal, Inc.	5/29/2013	5/30/2013	Concrete Floor	Crusher Room
TSCA Concrete	010331247JJK	E134083WDI	22.80	TONS	Beelman	3020	Wayne Disposal, Inc.	5/30/2013	5/30/2013	Concrete Floor	Crusher & Furnace Room
TSCA Concrete	010331248JJK	E134083WDI	21.65	TONS	Beelman	556	Wayne Disposal, Inc.	5/30/2013	5/30/2013	Concrete Floor	Crusher & Furnace Room
TSCA Concrete	010331249JJK	E134083WDI	21.98	TONS	Beelman	917	Wayne Disposal, Inc.	5/30/2013	5/30/2013	Concrete Floor	Crusher & Furnace Room
TSCA Concrete	010331250JJK	E134083WDI	23.20	TONS	Beelman	3020	Wayne Disposal, Inc.	5/31/2013	5/31/2013	Concrete Floor	Crusher & Furnace Room
TSCA Concrete	010331251JJK	E134083WDI	21.76	TONS	Beelman	556	Wayne Disposal, Inc.	5/31/2013	5/31/2013	Concrete Floor	Crusher & Furnace Room
TSCA Concrete	010331252JJK	E134083WDI	21.23	TONS	Beelman	917	Wayne Disposal, Inc.	5/31/2013	5/31/2013	Concrete Floor	Crusher & Furnace Room
TSCA Concrete	010331261JJK	E134083WDI	22.51	TONS	Beelman	3020	Wayne Disposal, Inc.	6/4/2013	6/4/2013	Concrete Floor & Wall	Crusher Room
TSCA Concrete	010331262JJK	E134083WDI	22.07	TONS	Beelman	556	Wayne Disposal, Inc.	6/4/2013	6/4/2013	Concrete Floor & Wall	Crusher Room
TSCA Concrete	010331263JJK	E134083WDI	20.25	TONS	Beelman	917	Wayne Disposal, Inc.	6/4/2013	6/4/2013	Concrete Floor & Wall	Crusher Room
	Total Tonnage Disposed:		**307.14**	TONS							

Attachment B1. Pit , Floor, and Wall Concrete Disposal Summary

Former Wabash Alloys
Connell Aluminum Properties, LLC

Waste Stream	Manifest #	Profile #	Qty	Unit	Hauler	Truck #	Disposal Location	Date Shipped	Date Received	Material Description	Material Location
PCB Contaminated Concrete (>1 to 5 PPM PCB)											
Concrete 1 - 5 ppm	1116025	EPL2013-054	19.07	TONS	Portland	48	Emerald Park	5/23/2013	5/23/2013	Concrete Blocks	West Furnace Room Wall
Concrete 1 - 5 ppm	1116052	EPL2013-054	17.91	TONS	Portland	48	Emerald Park	5/23/2013	5/23/2013	Concrete Blocks	West Furnace Room Wall
Concrete 1 - 5 ppm	1116076	EPL2013-054	21.06	TONS	Portland	50	Emerald Park	5/23/2013	5/23/2013	Concrete Blocks	West Furnace Room Wall
Concrete 1 - 5 ppm	1116077	EPL2013-054	20.35	TONS	Portland	48	Emerald Park	5/23/2013	5/23/2013	Concrete Blocks	West Furnace Room Wall
Concrete 1 - 5 ppm	1116094	EPL2013-054	18.49	TONS	Portland	50	Emerald Park	5/23/2013	5/23/2013	Concrete Blocks	West Furnace Room Wall
Concrete 1 - 5 ppm	1116099	EPL2013-054	18.52	TONS	Portland	48	Emerald Park	5/23/2013	5/23/2013	Concrete Walls	Ingot Storage/Maintenance/Chlorine/Office Rooms
Concrete 1 - 5 ppm	1116120	EPL2013-054	23.21	TONS	Portland	50	Emerald Park	5/23/2013	5/23/2013	Concrete Walls	Ingot Storage/Maintenance/Chlorine/Office Rooms
Concrete 1 - 5 ppm	1116121	EPL2013-054	21.54	TONS	Portland	48	Emerald Park	5/23/2013	5/23/2013	Concrete Walls	Ingot Storage/Maintenance/Chlorine/Office Rooms
Concrete 1 - 5 ppm	1116138	EPL2013-054	20.2	TONS	Portland	50	Emerald Park	5/23/2013	5/23/2013	Concrete Walls	Ingot Storage/Maintenance/Chlorine/Office Rooms
Concrete 1 - 5 ppm	1116140	EPL2013-054	21.93	TONS	Portland	48	Emerald Park	5/23/2013	5/23/2013	Concrete Walls	Ingot Storage/Maintenance/Chlorine/Office Rooms
Concrete 1 - 5 ppm	1116167	EPL2013-054	23.85	TONS	Portland	50	Emerald Park	5/23/2013	5/23/2013	Concrete Walls	Ingot Storage/Maintenance/Chlorine/Office Rooms
Concrete 1 - 5 ppm	1116169	EPL2013-054	22.79	TONS	Portland	48	Emerald Park	5/23/2013	5/23/2013	Concrete Walls	Ingot Storage/Maintenance/Chlorine/Office Rooms
Concrete 1 - 5 ppm	1121728	EPL2013-054	20.64	TONS	Portland	50	Emerald Park	7/10/2013	7/10/2013	Outside Pile	Ingot Storage/Maintenance/Chlorine/Office Rooms
Concrete 1 - 5 ppm	1121734	EPL2013-054	20.57	TONS	UPC	311	Emerald Park	7/10/2013	7/10/2013	Outside Pile	Ingot Storage/Maintenance/Chlorine/Office Rooms
Concrete 1 - 5 ppm	1121766	EPL2013-054	21.92	TONS	Portland	50	Emerald Park	7/10/2013	7/10/2013	Outside Pile	Ingot Storage/Maintenance/Chlorine/Office Rooms
Concrete 1 - 5 ppm	1121768	EPL2013-054	20.08	TONS	UPC	311	Emerald Park	7/10/2013	7/10/2013	Outside Pile	Ingot Storage/Maintenance/Chlorine/Office Rooms
Concrete 1 - 5 ppm	1121790	EPL2013-054	20.14	TONS	UPC	311	Emerald Park	7/10/2013	7/10/2013	Outside Pile	Ingot Storage/Maintenance/Chlorine/Office Rooms
Concrete 1 - 5 ppm	1121794	EPL2013-054	21.42	TONS	Portland	50	Emerald Park	7/10/2013	7/10/2013	Outside Pile	Ingot Storage/Maintenance/Chlorine/Office Rooms
Concrete 1 - 5 ppm	1121814	EPL2013-054	21.4	TONS	UPC	311	Emerald Park	7/10/2013	7/10/2013	Outside Pile	Ingot Storage/Maintenance/Chlorine/Office Rooms
Concrete 1 - 5 ppm	1121819	EPL2013-054	20.34	TONS	Portland	50	Emerald Park	7/10/2013	7/10/2013	Outside Pile	Ingot Storage/Maintenance/Chlorine/Office Rooms
Concrete 1 - 5 ppm	1121847	EPL2013-054	21.22	TONS	Portland	50	Emerald Park	7/10/2013	7/10/2013	Outside Pile	Ingot Storage/Maintenance/Chlorine/Office Rooms
Concrete 1 - 5 ppm	1121876	EPL2013-054	19.87	TONS	UPC	311	Emerald Park	7/10/2013	7/10/2013	Outside Pile	Ingot Storage/Maintenance/Chlorine/Office Rooms
Concrete 1 - 5 ppm	1121920	EPL2013-054	23.84	TONS	Portland	50	Emerald Park	7/11/2013	7/11/2013	Outside Pile	Ingot Storage/Maintenance/Chlorine/Office Rooms
Concrete 1 - 5 ppm	1121922	EPL2013-054	21.66	TONS	UPC	311	Emerald Park	7/11/2013	7/11/2013	Outside Pile	Ingot Storage/Maintenance/Chlorine/Office Rooms
Concrete 1 - 5 ppm	1121942	EPL2013-054	21.94	TONS	Portland	50	Emerald Park	7/11/2013	7/11/2013	Outside Pile	Ingot Storage/Maintenance/Chlorine/Office Rooms
Concrete 1 - 5 ppm	1121946	EPL2013-054	18.69	TONS	UPC	311	Emerald Park	7/11/2013	7/11/2013	Outside Pile	Ingot Storage/Maintenance/Chlorine/Office Rooms
Concrete 1 - 5 ppm	1121978	EPL2013-054	8.94	TONS	UPC	311	Emerald Park	7/11/2013	7/11/2013	Ladle Pits	Furnace Room
Concrete 1 - 5 ppm	1121980	EPL2013-054	18.28	TONS	Portland	50	Emerald Park	7/11/2013	7/11/2013	Ladle Pits	Furnace Room
Concrete 1 - 5 ppm	1122011	EPL2013-054	21.68	TONS	Portland	50	Emerald Park	7/11/2013	7/11/2013	Ladle Pits	Furnace Room
Concrete 1 - 5 ppm	1122012	EPL2013-054	13.1	TONS	UPC	311	Emerald Park	7/11/2013	7/11/2013	Ladle Pits	Furnace Room
Concrete 1 - 5 ppm	1122045	EPL2013-054	17.4	TONS	UPC	311	Emerald Park	7/11/2013	7/11/2013	Ladle Pits	Furnace Room
Concrete 1 - 5 ppm	1122046	EPL2013-054	19.52	TONS	Portland	50	Emerald Park	7/11/2013	7/11/2013	Ladle Pits	Furnace Room
Concrete 1 - 5 ppm	1122047	EPL2013-054	22.92	TONS	Portland	1027	Emerald Park	7/11/2013	7/11/2013	Ladle Pits	Furnace Room
Concrete 1 - 5 ppm	1122084	EPL2013-054	24.13	TONS	Portland	1027	Emerald Park	7/11/2013	7/11/2013	Ladle Pits	Furnace Room
Concrete 1 - 5 ppm	1122087	EPL2013-054	13.37	TONS	UPC	311	Emerald Park	7/11/2013	7/11/2013	Ladle Pits	Furnace Room
Concrete 1 - 5 ppm	1122116	EPL2013-054	18.97	TONS	Portland	1027	Emerald Park	7/12/2013	7/12/2013	Ladle Pits	Furnace Room
Concrete 1 - 5 ppm	1122118	EPL2013-054	8.22	TONS	UPC	311	Emerald Park	7/12/2013	7/12/2013	Ladle Pits	Furnace Room
Concrete 1 - 5 ppm	1122139	EPL2013-054	21.66	TONS	Portland	1027	Emerald Park	7/12/2013	7/12/2013	Ladle Pits	Furnace Room
Concrete 1 - 5 ppm	1122146	EPL2013-054	16.31	TONS	UPC	311	Emerald Park	7/12/2013	7/12/2013	Ladle Pits	Furnace Room
Concrete 1 - 5 ppm	1122171	EPL2013-054	24.28	TONS	Portland	1027	Emerald Park	7/12/2013	7/12/2013	Ladle Pits	Furnace Room
Concrete 1 - 5 ppm	1122175	EPL2013-054	17.87	TONS	UPC	311	Emerald Park	7/12/2013	7/12/2013	Ladle Pits	Furnace Room
Concrete 1 - 5 ppm	1122198	EPL2013-054	21.19	TONS	Portland	1027	Emerald Park	7/12/2013	7/12/2013	Ladle Pits/Bag House Foundations	Furnace Room/Exterior Bag Houses
Concrete 1 - 5 ppm	1122203	EPL2013-054	15.3	TONS	UPC	311	Emerald Park	7/12/2013	7/12/2013	Ladle Pits	Furnace Room
Concrete 1 - 5 ppm	1122243	EPL2013-054	14.84	TONS	UPC	311	Emerald Park	7/12/2013	7/12/2013	Ladle Pits/Bag House Foundations	Furnace Room/Exterior Bag Houses
Concrete 1 - 5 ppm	1122326	EPL2013-054	18.25	TONS	UPC	311	Emerald Park	7/15/2013	7/15/2013	Ladle Pits/Bag House Foundations	Furnace Room/Exterior Bag Houses
Concrete 1 - 5 ppm	1122328	EPL2013-054	23.56	TONS	UPC	111	Emerald Park	7/15/2013	7/15/2013	Ladle Pits/Bag House Foundations	Furnace Room/Exterior Bag Houses
Concrete 1 - 5 ppm	1122329	EPL2013-054	19.48	TONS	Portland	48	Emerald Park	7/15/2013	7/15/2013	Ladle Pits/Bag House Foundations	Furnace Room/Exterior Bag Houses
Concrete 1 - 5 ppm	1122334	EPL2013-054	22.27	TONS	Portland	50	Emerald Park	7/15/2013	7/15/2013	Ladle Pits/Bag House Foundations	Furnace Room/Exterior Bag Houses
Concrete 1 - 5 ppm	1122353	EPL2013-054	24.03	TONS	UPC	111	Emerald Park	7/15/2013	7/15/2013	Ladle Pits/Bag House Foundations	Furnace Room/Exterior Bag Houses
Concrete 1 - 5 ppm	1122362	EPL2013-054	21.85	TONS	UPC	311	Emerald Park	7/15/2013	7/15/2013	Ladle Pits/Bag House Foundations	Furnace Room/Exterior Bag Houses
Concrete 1 - 5 ppm	1122364	EPL2013-054	18.37	TONS	Portland	48	Emerald Park	7/15/2013	7/15/2013	Ladle Pits/Bag House Foundations	Furnace Room/Exterior Bag Houses
Concrete 1 - 5 ppm	1122369	EPL2013-054	20.69	TONS	Portland	50	Emerald Park	7/15/2013	7/15/2013	Ladle Pits/Bag House Foundations	Furnace Room/Exterior Bag Houses
Concrete 1 - 5 ppm	1122388	EPL2013-054	20.08	TONS	UPC	111	Emerald Park	7/15/2013	7/15/2013	Ladle Pits/Bag House Foundations	Furnace Room/Exterior Bag Houses
Concrete 1 - 5 ppm	1122395	EPL2013-054	26.21	TONS	Portland	1027	Emerald Park	7/15/2013	7/15/2013	Ladle Pits/Bag House Foundations	Furnace Room/Exterior Bag Houses
Concrete 1 - 5 ppm	1122400	EPL2013-054	18.97	TONS	UPC	311	Emerald Park	7/15/2013	7/15/2013	Ladle Pits/Bag House Foundations	Furnace Room/Exterior Bag Houses
Concrete 1 - 5 ppm	1122401	EPL2013-054	20.18	TONS	Portland	48	Emerald Park	7/15/2013	7/15/2013	Ladle Pits/Bag House Foundations	Furnace Room/Exterior Bag Houses
Concrete 1 - 5 ppm	1122414	EPL2013-054	23.5	TONS	UPC	111	Emerald Park	7/15/2013	7/15/2013	Ladle Pits/Bag House Foundations	Furnace Room/Exterior Bag Houses
Concrete 1 - 5 ppm	1122421	EPL2013-054	24.4	TONS	Portland	1027	Emerald Park	7/15/2013	7/15/2013	Bag House Foundations	Exterior Bag Houses
Concrete 1 - 5 ppm	1122432	EPL2013-054	16.92	TONS	UPC	311	Emerald Park	7/15/2013	7/15/2013	Bag House Foundations	Exterior Bag Houses
Concrete 1 - 5 ppm	1122458	EPL2013-054	20.01	TONS	UPC	111	Emerald Park	7/15/2013	7/15/2013	Concrete Pits	Outside Pits in rear of Building
Concrete 1 - 5 ppm	1122492	EPL2013-054	20.6	TONS	UPC	111	Emerald Park	7/15/2013	7/15/2013	Concrete Pits	Outside Pits in rear of Building

Attachment B1. Pit , Floor, and Wall Concrete Disposal Summary

Former Wabash Alloys
Connell Aluminum Properties, LLC

Waste Stream	Manifest #	Profile #	Qty	Unit	Hauler	Truck #	Disposal Location	Date Shipped	Date Received	Material Description	Material Location
Concrete 1 - 5 ppm	1122599	EPL2013-054	24.65	TONS	Portland	1027	Emerald Park	7/16/2013	7/16/2013	Concrete Pits	Outside Pits in rear of Building
Concrete 1 - 5 ppm	1122601	EPL2013-054	18.79	TONS	Portland	48	Emerald Park	7/16/2013	7/16/2013	Concrete Pits	Outside Pits in rear of Building
Concrete 1 - 5 ppm	1122612	EPL2013-054	20.42	TONS	Portland	45	Emerald Park	7/16/2013	7/16/2013	Concrete Pits	Furnace Room/Exterior Bag Houses
Concrete 1 - 5 ppm	1122635	EPL2013-054	24.98	TONS	Portland	1027	Emerald Park	7/16/2013	7/16/2013	Concrete Pits	Outside Pits in rear of Building
Concrete 1 - 5 ppm	1122637	EPL2013-054	21.16	TONS	Portland	48	Emerald Park	7/16/2013	7/16/2013	Concrete Pits	Outside Pits in rear of Building
Concrete 1 - 5 ppm	1123737	EPL2013-054	17.39	TONS	Portland	48	Emerald Park	7/23/2013	7/23/2013	Concrete Walls	Crusher Pit Room
Concrete 1 - 5 ppm	1123738	EPL2013-054	19.09	TONS	Portland	49	Emerald Park	7/23/2013	7/23/2013	Concrete Walls	Crusher Pit Room
Concrete 1 - 5 ppm	1123752	EPL2013-054	18.37	TONS	Portland	50	Emerald Park	7/23/2013	7/23/2013	Concrete Walls	Crusher Pit Room
Concrete 1 - 5 ppm	1123767	EPL2013-054	20	TONS	UPC	311	Emerald Park	7/23/2013	7/23/2013	Concrete Walls	Crusher Pit Room
Concrete 1 - 5 ppm	1123787	EPL2013-054	17.9	TONS	Portland	49	Emerald Park	7/23/2013	7/23/2013	Concrete Walls	Crusher Pit Room
Concrete 1 - 5 ppm	1123791	EPL2013-054	17.29	TONS	Portland	48	Emerald Park	7/23/2013	7/23/2013	Concrete Walls	Crusher Pit Room
Concrete 1 - 5 ppm	1123795	EPL2013-054	17.58	TONS	Portland	50	Emerald Park	7/23/2013	7/23/2013	Concrete Walls	Crusher Pit Room
Concrete 1 - 5 ppm	1123812	EPL2013-054	15.02	TONS	UPC	311	Emerald Park	7/23/2013	7/23/2013	Concrete Walls	Crusher Pit Room
Concrete 1 - 5 ppm	1123832	EPL2013-054	14.75	TONS	Portland	48	Emerald Park	7/23/2013	7/23/2013	Concrete Walls	Crusher Pit Room
Concrete 1 - 5 ppm	1123840	EPL2013-054	16.75	TONS	Portland	50	Emerald Park	7/23/2013	7/23/2013	Concrete Walls	Crusher Pit Room
Concrete 1 - 5 ppm	1123850	EPL2013-054	18.13	TONS	UPC	311	Emerald Park	7/23/2013	7/23/2013	Concrete Walls	Crusher Pit Room
Concrete 1 - 5 ppm	1123875	EPL2013-054	16.07	TONS	Portland	48	Emerald Park	7/23/2013	7/23/2013	Concrete Walls	Crusher Pit Room
Concrete 1 - 5 ppm	1126217	EPL2013-054	18.84	TONS	Portland	48	Emerald Park	8/9/2013	8/9/2013	Concrete Walls	Crusher Pit and Crusher Room Bins
Concrete 1 - 5 ppm	1126247	EPL2013-054	24.01	TONS	Portland	49	Emerald Park	8/9/2013	8/9/2013	Concrete Walls	Crusher Pit and Crusher Room Bins
Concrete 1 - 5 ppm	1126252	EPL2013-054	21.68	TONS	Portland	50	Emerald Park	8/9/2013	8/9/2013	Concrete Walls	Crusher Pit and Crusher Room Bins
Concrete 1 - 5 ppm	1126255	EPL2013-054	21.31	TONS	Portland	48	Emerald Park	8/9/2013	8/9/2013	Concrete Walls	Crusher Pit and Crusher Room Bins
Concrete 1 - 5 ppm	1126276	EPL2013-054	22.66	TONS	MRD	95	Emerald Park	8/9/2013	8/9/2013	Concrete Walls	Crusher Pit and Crusher Room Bins
Concrete 1 - 5 ppm	1126278	EPL2013-054	19.81	TONS	Portland	50	Emerald Park	8/9/2013	8/9/2013	Concrete Walls	Crusher Pit and Crusher Room Bins
Concrete 1 - 5 ppm	1126280	EPL2013-054	19.36	TONS	Portland	48	Emerald Park	8/9/2013	8/9/2013	Concrete Walls	Crusher Pit and Crusher Room Bins
Concrete 1 - 5 ppm	1126306	EPL2013-054	24.88	TONS	MRD	95	Emerald Park	8/9/2013	8/9/2013	Concrete Walls	Crusher Pit and Crusher Room Bins
Concrete 1 - 5 ppm	1126307	EPL2013-054	21.46	TONS	Portland	50	Emerald Park	8/9/2013	8/9/2013	Concrete Walls	Crusher Pit and Crusher Room Bins
Concrete 1 - 5 ppm	1126309	EPL2013-054	20.98	TONS	Portland	48	Emerald Park	8/9/2013	8/9/2013	Concrete Walls	Crusher Pit and Crusher Room Bins
Concrete 1 - 5 ppm	1126318	EPL2013-054	22.7	TONS	Portland	49	Emerald Park	8/9/2013	8/9/2013	Concrete Walls	Crusher Pit and Crusher Room Bins
Concrete 1 - 5 ppm	1126333	EPL2013-054	20.14	TONS	Portland	50	Emerald Park	8/9/2013	8/9/2013	Concrete Walls	Crusher Pit and Crusher Room Bins
Concrete 1 - 5 ppm	1126340	EPL2013-054	24.26	TONS	MRD	95	Emerald Park	8/9/2013	8/9/2013	Concrete Walls	Crusher Pit and Crusher Room Bins
Concrete 1 - 5 ppm	1126342	EPL2013-054	22.01	TONS	Portland	48	Emerald Park	8/9/2013	8/9/2013	Concrete Walls	Crusher Pit and Crusher Room Bins
Concrete 1 - 5 ppm	1126407	EPL2013-054	22.43	TONS	Portland	50	Emerald Park	8/12/2013	8/12/2013	Concrete Walls	Crusher Pit and Crusher Room Bins
Concrete 1 - 5 ppm	1126409	EPL2013-054	24.14	TONS	Portland	49	Emerald Park	8/12/2013	8/12/2013	Concrete Walls	Crusher Pit and Crusher Room Bins
Concrete 1 - 5 ppm	1126412	EPL2013-054	24.59	TONS	Portland	48	Emerald Park	8/12/2013	8/12/2013	Concrete Walls	Crusher Pit and Crusher Room Bins
Concrete 1 - 5 ppm	1126450	EPL2013-054	21.51	TONS	Portland	50	Emerald Park	8/12/2013	8/12/2013	Concrete Walls	Crusher Pit and Crusher Room Bins
Concrete 1 - 5 ppm	1126453	EPL2013-054	23.09	TONS	Portland	49	Emerald Park	8/12/2013	8/12/2013	Concrete Walls	Crusher Pit and Crusher Room Bins
Concrete 1 - 5 ppm	1126460	EPL2013-054	25.05	TONS	Portland	48	Emerald Park	8/12/2013	8/12/2013	Concrete Walls	Crusher Pit and Crusher Room Bins
Concrete 1 - 5 ppm	1126464	EPL2013-054	23.88	TONS	UPC	311	Emerald Park	8/12/2013	8/12/2013	Concrete Walls	Crusher Pit and Crusher Room Bins
Concrete 1 - 5 ppm	1126494	EPL2013-054	22.6	TONS	Portland	50	Emerald Park	8/12/2013	8/12/2013	Concrete Walls	Crusher Pit and Crusher Room Bins
Concrete 1 - 5 ppm	1126498	EPL2013-054	24.71	TONS	Portland	49	Emerald Park	8/12/2013	8/12/2013	Concrete Walls	Crusher Pit and Crusher Room Bins
Concrete 1 - 5 ppm	1126502	EPL2013-054	21.71	TONS	Portland	48	Emerald Park	8/12/2013	8/12/2013	Concrete Walls	Crusher Pit and Crusher Room Bins
Concrete 1 - 5 ppm	1126518	EPL2013-054	17.25	TONS	UPC	311	Emerald Park	8/12/2013	8/12/2013	Concrete Walls	Crusher Pit and Crusher Room Bins
Concrete 1 - 5 ppm	1126534	EPL2013-054	22.01	TONS	Portland	50	Emerald Park	8/12/2013	8/12/2013	Concrete Walls	Crusher Pit and Crusher Room Bins
Concrete 1 - 5 ppm	1126537	EPL2013-054	21.68	TONS	Portland	49	Emerald Park	8/12/2013	8/12/2013	Concrete Walls	Crusher Pit and Crusher Room Bins
Concrete 1 - 5 ppm	1126543	EPL2013-054	17.73	TONS	Portland	48	Emerald Park	8/12/2013	8/12/2013	Concrete Walls	Crusher Pit and Crusher Room Bins
Concrete 1 - 5 ppm	1126548	EPL2013-054	21.19	TONS	UPC	311	Emerald Park	8/12/2013	8/12/2013	Concrete Walls	Crusher Pit and Crusher Room Bins
Concrete 1 - 5 ppm	1126574	EPL2013-054	19.05	TONS	Portland	50	Emerald Park	8/12/2013	8/12/2013	Concrete Walls	Crusher Pit and Crusher Room Bins
Concrete 1 - 5 ppm	1126577	EPL2013-054	22.58	TONS	Portland	49	Emerald Park	8/12/2013	8/12/2013	Concrete Walls	Crusher Pit and Crusher Room Bins
Concrete 1 - 5 ppm	1126579	EPL2013-054	19.31	TONS	Portland	48	Emerald Park	8/12/2013	8/12/2013	Concrete Walls	Crusher Pit and Crusher Room Bins
Concrete 1 - 5 ppm	1126620	EPL2013-054	20.95	TONS	Portland	50	Emerald Park	8/12/2013	8/12/2013	Concrete Walls	Crusher Pit and Crusher Room Bins
Concrete 1 - 5 ppm	1126621	EPL2013-054	21.45	TONS	Portland	49	Emerald Park	8/12/2013	8/12/2013	Concrete Walls	Crusher Pit and Crusher Room Bins
Concrete 1 - 5 ppm	1126630	EPL2013-054	20.04	TONS	Portland	48	Emerald Park	8/12/2013	8/12/2013	Concrete Walls	Crusher Pit and Crusher Room Bins
Concrete 1 - 5 ppm	1126676	EPL2013-054	22.45	TONS	Portland	50	Emerald Park	8/13/2013	8/13/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 1 - 5 ppm	1126678	EPL2013-054	22.21	TONS	Portland	49	Emerald Park	8/13/2013	8/13/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 1 - 5 ppm	1126679	EPL2013-054	23.08	TONS	Portland	48	Emerald Park	8/13/2013	8/13/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 1 - 5 ppm	1126696	EPL2013-054	21.45	TONS	UPC	311	Emerald Park	8/13/2013	8/13/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 1 - 5 ppm	1126698	EPL2013-054	21.36	TONS	Portland	50	Emerald Park	8/13/2013	8/13/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 1 - 5 ppm	1126702	EPL2013-054	23.15	TONS	Portland	49	Emerald Park	8/13/2013	8/13/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 1 - 5 ppm	1126706	EPL2013-054	19.12	TONS	Portland	48	Emerald Park	8/13/2013	8/13/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 1 - 5 ppm	1126734	EPL2013-054	19.49	TONS	UPC	311	Emerald Park	8/13/2013	8/13/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 1 - 5 ppm	1126737	EPL2013-054	19.63	TONS	Portland	50	Emerald Park	8/13/2013	8/13/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins

Attachment B1. Pit , Floor, and Wall Concrete Disposal Summary

Former Wabash Alloys
Connell Aluminum Properties, LLC

Waste Stream	Manifest #	Profile #	Qty	Unit	Hauler	Truck #	Disposal Location	Date Shipped	Date Received	Material Description	Material Location
Concrete 1 - 5 ppm	1126738	EPL2013-054	21.32	TONS	Portland	49	Emerald Park	8/13/2013	8/13/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 1 - 5 ppm	1126743	EPL2013-054	20.09	TONS	Portland	48	Emerald Park	8/13/2013	8/13/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 1 - 5 ppm	1126773	EPL2013-054	22.18	TONS	Portland	50	Emerald Park	8/13/2013	8/13/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 1 - 5 ppm	1126776	EPL2013-054	24.10	TONS	Portland	49	Emerald Park	8/13/2013	8/13/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 1 - 5 ppm	1126778	EPL2013-054	21.46	TONS	Portland	48	Emerald Park	8/13/2013	8/13/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 1 - 5 ppm	1126809	EPL2013-054	17.79	TONS	Portland	50	Emerald Park	8/13/2013	8/13/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 1 - 5 ppm	1126812	EPL2013-054	20.07	TONS	Portland	49	Emerald Park	8/13/2013	8/13/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 1 - 5 ppm	1126850	EPL2013-054	17.42	TONS	Portland	50	Emerald Park	8/13/2013	8/13/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 1 - 5 ppm	1126853	EPL2013-054	18.07	TONS	Portland	49	Emerald Park	8/13/2013	8/13/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 1 - 5 ppm	1126858	EPL2013-054	20.54	TONS	UPC	311	Emerald Park	8/13/2013	8/13/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 1 - 5 ppm	1126859	EPL2013-054	18.47	TONS	Portland	48	Emerald Park	8/13/2013	8/13/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 1 - 5 ppm	1126863	EPL2013-054	21.76	TONS	MRD	95	Emerald Park	8/13/2013	8/13/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 1 - 5 ppm	1126869	EPL2013-054	20.15	TONS	Portland	48	Emerald Park	8/13/2013	8/13/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 1 - 5 ppm	1126912	EPL2013-054	18.61	TONS	Portland	48	Emerald Park	8/14/2013	8/14/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 1 - 5 ppm	1126927	EPL2013-054	19.58	TONS	Portland	48	Emerald Park	8/14/2013	8/14/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 1 - 5 ppm	1126929	EPL2013-054	19.69	TONS	UPC	311	Emerald Park	8/14/2013	8/14/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 1 - 5 ppm	1126950	EPL2013-054	18.72	TONS	Portland	48	Emerald Park	8/14/2013	8/14/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 1 - 5 ppm	1126954	EPL2013-054	18.64	TONS	UPC	311	Emerald Park	8/14/2013	8/14/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 1 - 5 ppm	1126972	EPL2013-054	24	TONS	Portland	48	Emerald Park	8/14/2013	8/14/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 1 - 5 ppm	1126976	EPL2013-054	21.01	TONS	UPC	311	Emerald Park	8/14/2013	8/14/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 1 - 5 ppm	1127001	EPL2013-054	20.33	TONS	Portland	48	Emerald Park	8/14/2013	8/14/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 1 - 5 ppm	1127005	EPL2013-054	17.99	TONS	UPC	311	Emerald Park	8/14/2013	8/14/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 1 - 5 ppm	1127028	EPL2013-054	21.27	TONS	Portland	48	Emerald Park	8/14/2013	8/14/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 1 - 5 ppm	1127033	EPL2013-054	15.15	TONS	UPC	311	Emerald Park	8/14/2013	8/14/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 1 - 5 ppm	1128831	EPL2013-054	15.85	TONS	UPC	311	Emerald Park	8/29/2013	8/29/2013	Concrete	Material from building walls
Concrete 1 - 5 ppm	1128863	EPL2013-054	16.39	TONS	UPC	311	Emerald Park	8/29/2013	8/29/2013	Concrete	Material from building walls
Concrete 1 - 5 ppm	1128882	EPL2013-054	11.84	TONS	UPC	311	Emerald Park	8/29/2013	8/29/2013	Concrete	Material from building walls
	Total Tonnage Disposed:		**3,013.8**	TONS							

Attachment B1. Pit , Floor, and Wall Concrete Disposal Summary

Former Wabash Alloys
Connell Aluminum Properties, LLC

Waste Stream	Manifest #	Profile #	Qty	Unit	Hauler	Truck #	Disposal Location	Date Shipped	Date Received	Material Description	Material Location
PCB Contaminated Concrete (>5 to <50 PPM PCB)											
Concrete 5 - 50 ppm	1125140	EPL2013-053	10.48	TONS	--	--	Emerald Park	8/1/2013	8/1/2013		
Concrete 5 - 50 ppm	1125981	EPL2013-053	22.94	TONS	Portland	49	Emerald Park	8/8/2013	8/8/2013	Concrete Floor	Crusher Pit
Concrete 5 - 50 ppm	1125984	EPL2013-053	17.41	TONS	Portland	50	Emerald Park	8/8/2013	8/8/2013	Concrete Floor	Crusher Pit
Concrete 5 - 50 ppm	1125986	EPL2013-053	21.71	TONS	Portland	48	Emerald Park	8/8/2013	8/8/2013	Concrete Floor	Crusher Pit
Concrete 5 - 50 ppm	1126016	EPL2013-053	18.45	TONS	Portland	50	Emerald Park	8/8/2013	8/8/2013	Concrete Floor	Crusher Pit
Concrete 5 - 50 ppm	1126019	EPL2013-053	20.52	TONS	Portland	48	Emerald Park	8/8/2013	8/8/2013	Concrete Floor	Crusher Pit
Concrete 5 - 50 ppm	1126020	EPL2013-053	21.97	TONS	Portland	49	Emerald Park	8/8/2013	8/8/2013	Concrete Floor	Crusher Pit
Concrete 5 - 50 ppm	1126046	EPL2013-053	22.4	TONS	Portland	50	Emerald Park	8/8/2013	8/8/2013	Concrete Floor	Crusher Pit
Concrete 5 - 50 ppm	1126050	EPL2013-053	19.29	TONS	Portland	48	Emerald Park	8/8/2013	8/8/2013	Concrete Floor	Crusher Pit
Concrete 5 - 50 ppm	1126051	EPL2013-053	23.35	TONS	Portland	49	Emerald Park	8/8/2013	8/8/2013	Concrete Floor	Crusher Pit
Concrete 5 - 50 ppm	1126070	EPL2013-053	25.38	TONS	MRD	395	Emerald Park	8/8/2013	8/8/2013	Concrete Floor	Crusher Pit
Concrete 5 - 50 ppm	1126072	EPL2013-053	20.51	TONS	Portland	50	Emerald Park	8/8/2013	8/8/2013	Concrete Floor	Crusher Pit
Concrete 5 - 50 ppm	1126073	EPL2013-053	22.07	TONS	Portland	49	Emerald Park	8/8/2013	8/8/2013	Concrete Floor	Crusher Pit
Concrete 5 - 50 ppm	1126085	EPL2013-053	30.46	TONS	Portland	95	Emerald Park	8/8/2013	8/8/2013	Concrete Floor	Crusher Pit
Concrete 5 - 50 ppm	1126086	EPL2013-053	21.19	TONS	Portland	48	Emerald Park	8/8/2013	8/8/2013	Concrete Floor	Crusher Pit
Concrete 5 - 50 ppm	1126102	EPL2013-053	20.77	TONS	Portland	50	Emerald Park	8/8/2013	8/8/2013	Concrete Floor	Crusher Pit
Concrete 5 - 50 ppm	1126107	EPL2013-053	18.35	TONS	MRD	395	Emerald Park	8/8/2013	8/8/2013	Concrete Floor	Crusher Pit
Concrete 5 - 50 ppm	1126108	EPL2013-053	15.5	TONS	Portland	49	Emerald Park	8/8/2013	8/8/2013	Concrete Floor	Crusher Pit
Concrete 5 - 50 ppm	1126111	EPL2013-053	18.45	TONS	Portland	48	Emerald Park	8/8/2013	8/8/2013	Concrete Floor	Crusher Pit
Concrete 5 - 50 ppm	1126123	EPL2013-053	20.67	TONS	MRD	395	Emerald Park	8/8/2013	8/8/2013	Concrete Floor	Crusher Pit
Concrete 5 - 50 ppm	1126132	EPL2013-053	16.43	TONS	Portland	50	Emerald Park	8/8/2013	8/8/2013	Concrete Floor	Crusher Pit
Concrete 5 - 50 ppm	1126142	EPL2013-053	22.23	TONS	Portland	49	Emerald Park	8/8/2013	8/8/2013	Concrete Floor	Crusher Pit
Concrete 5 - 50 ppm	1126155	EPL2013-053	20.82	TONS	Portland	48	Emerald Park	8/8/2013	8/8/2013	Concrete Floor	Crusher Pit
Concrete 5 - 50 ppm	1126182	EPL2013-053	20.68	TONS	Portland	49	Emerald Park	8/9/2013	8/9/2013	Concrete Floor	Crusher Pit
Concrete 5 - 50 ppm	1126184	EPL2013-053	21.16	TONS	Portland	50	Emerald Park	8/9/2013	8/9/2013	Concrete Floor	Crusher Pit
Concrete 5 - 50 ppm	1126188	EPL2013-053	17.74	TONS	Portland	48	Emerald Park	8/9/2013	8/9/2013	Concrete Floor	Crusher Pit
Concrete 5 - 50 ppm	1126209	EPL2013-053	24.44	TONS	Portland	49	Emerald Park	8/9/2013	8/9/2013	Concrete Floor	Crusher Pit
Concrete 5 - 50 ppm	1126215	EPL2013-053	20.34	TONS	Portland	50	Emerald Park	8/9/2013	8/9/2013	Concrete Floor	Crusher Pit
Concrete 5 - 50 ppm	1127054	EPL2013-053	16.6	TONS	Portland	48	Emerald Park	8/14/2013	8/14/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 5 - 50 ppm	1127092	EPL2013-053	20.17	TONS	Portland	48	Emerald Park	8/15/2013	8/15/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 5 - 50 ppm	1127095	EPL2013-053	18.1	TONS	Portland	49	Emerald Park	8/15/2013	8/15/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 5 - 50 ppm	1127098	EPL2013-053	17.72	TONS	Portland	50	Emerald Park	8/15/2013	8/15/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 5 - 50 ppm	1127100	EPL2013-053	21.19	TONS	UPC	311	Emerald Park	8/15/2013	8/15/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 5 - 50 ppm	1127131	EPL2013-053	19.85	TONS	Portland	48	Emerald Park	8/15/2013	8/15/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 5 - 50 ppm	1127133	EPL2013-053	21.42	TONS	Portland	49	Emerald Park	8/15/2013	8/15/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 5 - 50 ppm	1127135	EPL2013-053	18.61	TONS	Portland	50	Emerald Park	8/15/2013	8/15/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 5 - 50 ppm	1127139	EPL2013-053	20.59	TONS	UPC	311	Emerald Park	8/15/2013	8/15/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 5 - 50 ppm	1127169	EPL2013-053	19.89	TONS	Portland	48	Emerald Park	8/15/2013	8/15/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 5 - 50 ppm	1127170	EPL2013-053	20.4	TONS	Portland	49	Emerald Park	8/15/2013	8/15/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 5 - 50 ppm	1127171	EPL2013-053	20.42	TONS	Portland	50	Emerald Park	8/15/2013	8/15/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 5 - 50 ppm	1127174	EPL2013-053	19.94	TONS	UPC	311	Emerald Park	8/15/2013	8/15/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 5 - 50 ppm	1127199	EPL2013-053	15.76	TONS	Portland	48	Emerald Park	8/15/2013	8/15/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 5 - 50 ppm	1127202	EPL2013-053	15.21	TONS	Portland	49	Emerald Park	8/15/2013	8/15/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 5 - 50 ppm	1127471	EPL2013-053	18.07	TONS	UPC	311	Emerald Park	8/19/2013	8/19/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 5 - 50 ppm	1127495	EPL2013-053	7.35	TONS	UPC	311	Emerald Park	8/19/2013	8/19/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Concrete 5 - 50 ppm	1128621	EPL2013-053	17.37	TONS	Portland	50	Emerald Park	8/28/2013	8/28/2013	Concrete	Chlorine Pit
Concrete 5 - 50 ppm	1128624	EPL2013-053	18.69	TONS	UPC	311	Emerald Park	8/28/2013	8/28/2013	Concrete	Chlorine Pit
Concrete 5 - 50 ppm	1128626	EPL2013-053	21.79	TONS	Portland	48	Emerald Park	8/28/2013	8/28/2013	Concrete	Chlorine Pit
Concrete 5 - 50 ppm	1128627	EPL2013-053	18.02	TONS	Portland	49	Emerald Park	8/28/2013	8/28/2013	Concrete	Chlorine Pit
Concrete 5 - 50 ppm	1128656	EPL2013-053	17.28	TONS	Portland	50	Emerald Park	8/28/2013	8/28/2013	Concrete	Chlorine Pit
Concrete 5 - 50 ppm	1128657	EPL2013-053	19.13	TONS	UPC	311	Emerald Park	8/28/2013	8/28/2013	Concrete	Chlorine Pit
Concrete 5 - 50 ppm	1128659	EPL2013-053	18.86	TONS	Portland	48	Emerald Park	8/28/2013	8/28/2013	Concrete	Chlorine Pit
Concrete 5 - 50 ppm	1128661	EPL2013-053	18.07	TONS	Portland	49	Emerald Park	8/28/2013	8/28/2013	Concrete	Chlorine Pit
Concrete 5 - 50 ppm	1128696	EPL2013-053	19.53	TONS	Portland	50	Emerald Park	8/28/2013	8/28/2013	Concrete	Chlorine Pit
Concrete 5 - 50 ppm	1128698	EPL2013-053	17.44	TONS	UPC	311	Emerald Park	8/28/2013	8/28/2013	Concrete	Chlorine Pit
Concrete 5 - 50 ppm	1128702	EPL2013-053	18.54	TONS	Portland	48	Emerald Park	8/28/2013	8/28/2013	Concrete	Chlorine Pit
Concrete 5 - 50 ppm	1128703	EPL2013-053	17.78	TONS	Portland	49	Emerald Park	8/28/2013	8/28/2013	Concrete	Chlorine Pit
Concrete 5 - 50 ppm	1128722	EPL2013-053	17.34	TONS	Portland	50	Emerald Park	8/28/2013	8/28/2013	Concrete	Chlorine Pit
Concrete 5 - 50 ppm	1128730	EPL2013-053	12.25	TONS	UPC	311	Emerald Park	8/28/2013	8/28/2013	Concrete	Chlorine Pit
	Total Tonnage Disposed:		**1,139.1**	TONS							

Attachment B1. Pit , Floor, and Wall Concrete Disposal Summary

Former Wabash Alloys
Connell Aluminum Properties, LLC

Waste Stream	Manifest #	Profile #	Qty	Unit	Hauler	Truck #	Disposal Location	Date Shipped	Date Received	Material Description	Material Location
PCB Bulk Product Waste (Painted Concrete)											
Painted Concrete	1115850	EPL2013-055	12.34	TONS	Portland	45	Emerald Park	5/22/2013	5/22/2013	Painted Concrete Walls & Blocks	Ingot Storage/Maintenance Room
Painted Concrete	1115854	EPL2013-055	13.80	TONS	Portland	48	Emerald Park	5/22/2013	5/22/2013	Painted Concrete Walls & Blocks	Ingot Storage/Maintenance Room
Painted Concrete	1115867	EPL2013-055	12.43	TONS	Portland	45	Emerald Park	5/22/2013	5/22/2013	Painted Concrete Walls & Blocks	Ingot Storage/Maintenance Room
Painted Concrete	1115870	EPL2013-055	12.64	TONS	Portland	48	Emerald Park	5/22/2013	5/22/2013	Painted Concrete Walls & Blocks	Ingot Storage/Maintenance Room
Painted Concrete	1115895	EPL2013-055	14.46	TONS	Portland	45	Emerald Park	5/22/2013	5/22/2013	Painted Concrete Walls & Blocks	Ingot Storage/Maintenance Room
Painted Concrete	1115897	EPL2013-055	14.27	TONS	Portland	48	Emerald Park	5/22/2013	5/22/2013	Painted Concrete Walls & Blocks	Ingot Storage/Maintenance Room
Painted Concrete	1115915	EPL2013-055	14.83	TONS	Portland	45	Emerald Park	5/22/2013	5/22/2013	Painted Concrete Walls & Blocks	Ingot Storage/Maintenance Room
Painted Concrete	1115916	EPL2013-055	17.26	TONS	Portland	48	Emerald Park	5/22/2013	5/22/2013	Painted Concrete Walls & Blocks	Ingot Storage/Maintenance Room
Painted Concrete	1115937	EPL2013-055	14.55	TONS	Portland	45	Emerald Park	5/22/2013	5/22/2013	Painted Concrete Walls & Blocks	Ingot Storage/Maintenance Room
Painted Concrete	1115942	EPL2013-055	14.68	TONS	Portland	48	Emerald Park	5/22/2013	5/22/2013	Painted Concrete Walls & Blocks	Ingot Storage/Maintenance Room
Painted Concrete	1115963	EPL2013-055	15.86	TONS	Portland	45	Emerald Park	5/22/2013	5/22/2013	Painted Concrete Walls & Blocks	Ingot Storage/Maintenance Room
Painted Concrete	1115967	EPL2013-055	14.25	TONS	Portland	48	Emerald Park	5/22/2013	5/22/2013	Painted Concrete Walls & Blocks	Ingot Storage/Maintenance Room
Painted Concrete	1115999	EPL2013-055	16.81	TONS	Portland	48	Emerald Park	5/22/2013	5/22/2013	Painted Concrete Walls & Blocks	Ingot Storage/Maintenance Room
Painted Concrete	1116000	EPL2013-055	15.71	TONS	Portland	45	Emerald Park	5/22/2013	5/22/2013	Painted Concrete Walls & Blocks	Ingot Storage/Maintenance Room
Painted Concrete	1116024	EPL2013-055	18.61	TONS	Portland	45	Emerald Park	5/23/2013	5/23/2013	Painted Concrete Walls & Blocks	Ingot Storage/Maintenance Room
Painted Concrete	1122531	EPL2013-055	19.29	TONS	Portland	48	Emerald Park	7/16/2013	7/16/2013	Concrete Walls	Ingot Storage Room West Wall
Painted Concrete	1122535	EPL2013-055	19.84	TONS	Portland	45	Emerald Park	7/16/2013	7/16/2013	Concrete Walls/ Equip. Foundations	Ingot Storage Room West Wall/Crusher Room Foundations
Painted Concrete	1122560	EPL2013-055	25.98	TONS	Portland	48	Emerald Park	7/16/2013	7/16/2013	Concrete Walls	Ingot Storage Room West Wall
Painted Concrete	1122576	EPL2013-055	18.5	TONS	Portland	45	Emerald Park	7/16/2013	7/16/2013	Concrete Walls	Ingot Storage Room West Wall
Painted Concrete	1122662	EPL2013-055	18.55	TONS	UPC	311	Emerald Park	7/16/2013	7/16/2013	Concrete Pits	Ingot Storage Room West Wall
Painted Concrete	1122719	EPL2013-055	18.21	TONS	Portland	48	Emerald Park	7/17/2013	7/17/2013	Concrete Walls	Ingot Storage Room East Wall
Painted Concrete	1122725	EPL2013-055	19.88	TONS	UPC	311	Emerald Park	7/17/2013	7/17/2013	Concrete Walls	Ingot Storage Room East Wall
Painted Concrete	1122747	EPL2013-055	20.73	TONS	Portland	48	Emerald Park	7/17/2013	7/17/2013	Concrete Walls	Ingot Storage Room East Wall
Painted Concrete	1122752	EPL2013-055	19.4	TONS	UPC	311	Emerald Park	7/17/2013	7/17/2013	Concrete Walls	Ingot Storage Room East Wall
Painted Concrete	1122788	EPL2013-055	19.3	TONS	UPC	311	Emerald Park	7/17/2013	7/17/2013	Concrete Walls	Ingot Storage Room South Wall
Painted Concrete	1123024	EPL2013-055	24.67	TONS	Portland	1027	Emerald Park	7/18/2013	7/18/2013	Concrete Walls	Ingot Storage Room South Wall
Painted Concrete	1123055	EPL2013-055	25.58	TONS	Portland	1027	Emerald Park	7/18/2013	7/18/2013	Concrete Walls	Ingot Storage Room South Wall
Painted Concrete	1122873	EPL2013-055	21.79	TONS	UPC	311	Emerald Park	7/22/2013	7/22/2013	Concrete Walls	Ingot Storage Room South Wall/Crusher Pit Room
Painted Concrete	1123407	EPL2013-055	23.7	TONS	UPC	311	Emerald Park	7/22/2013	7/22/2013	Concrete Walls	Ingot Storage Room South Wall/Crusher Pit Room
Painted Concrete	1123415	EPL2013-055	20.11	TONS	Portland	45	Emerald Park	7/22/2013	7/22/2013	Concrete Walls	Ingot Storage Room South Wall/Crusher Pit Room
Painted Concrete	1123417	EPL2013-055	19.46	TONS	Portland	48	Emerald Park	7/22/2013	7/22/2013	Concrete Walls	Ingot Storage Room South Wall/Crusher Pit Room
Painted Concrete	1123437	EPL2013-055	18.54	TONS	UPC	311	Emerald Park	7/22/2013	7/22/2013	Concrete Walls	Ingot Storage Room South Wall/Crusher Pit Room
Painted Concrete	1123447	EPL2013-055	22.19	TONS	Portland	45	Emerald Park	7/22/2013	7/22/2013	Concrete Walls	Ingot Storage Room South Wall/Crusher Pit Room
Painted Concrete	1123452	EPL2013-055	21.41	TONS	Portland	48	Emerald Park	7/22/2013	7/22/2013	Concrete Walls	Ingot Storage Room South Wall/Crusher Pit Room
Painted Concrete	1123453	EPL2013-055	20.86	TONS	Portland	49	Emerald Park	7/22/2013	7/22/2013	Concrete Walls	Ingot Storage Room South Wall/Crusher Pit Room
Painted Concrete	1123454	EPL2013-055	20.66	TONS	Portland	49	Emerald Park	7/22/2013	7/22/2013	Concrete Walls	Ingot Storage Room South Wall/Crusher Pit Room
Painted Concrete	1123486	EPL2013-055	20.8	TONS	UPC	311	Emerald Park	7/22/2013	7/22/2013	Concrete Walls	Ingot Storage Room South Wall/Crusher Pit Room
Painted Concrete	1123490	EPL2013-055	18.44	TONS	Portland	45	Emerald Park	7/22/2013	7/22/2013	Concrete Walls	Ingot Storage Room South Wall/Crusher Pit Room
Painted Concrete	1123491	EPL2013-055	19.87	TONS	Portland	49	Emerald Park	7/22/2013	7/22/2013	Concrete Walls	Ingot Storage Room South Wall/Crusher Pit Room
Painted Concrete	1123500	EPL2013-055	19.81	TONS	Portland	48	Emerald Park	7/22/2013	7/22/2013	Concrete Walls	Ingot Storage Room South Wall/Crusher Pit Room
Painted Concrete	1123526	EPL2013-055	21.89	TONS	UPC	311	Emerald Park	7/22/2013	7/22/2013	Concrete Walls	Ingot Storage Room South Wall/Crusher Pit Room
Painted Concrete	1123530	EPL2013-055	23.16	TONS	Portland	45	Emerald Park	7/22/2013	7/22/2013	Concrete Walls	Ingot Storage Room South Wall/Crusher Pit Room
Painted Concrete	1123531	EPL2013-055	16.84	TONS	Portland	49	Emerald Park	7/22/2013	7/22/2013	Concrete Walls	Ingot Storage Room South Wall/Crusher Pit Room
Painted Concrete	1123536	EPL2013-055	23.89	TONS	Portland	48	Emerald Park	7/22/2013	7/22/2013	Concrete Walls	Ingot Storage Room South Wall/Crusher Pit Room
Painted Concrete	1123569	EPL2013-055	24.84	TONS	UPC	311	Emerald Park	7/22/2013	7/22/2013	Concrete Walls	Ingot Storage Room South Wall/Crusher Pit Room
Painted Concrete	1123576	EPL2013-055	20.23	TONS	Portland	45	Emerald Park	7/22/2013	7/22/2013	Concrete Walls	Ingot Storage Room South Wall/Crusher Pit Room
Painted Concrete	1123577	EPL2013-055	14.99	TONS	Portland	49	Emerald Park	7/22/2013	7/22/2013	Concrete Walls	Ingot Storage Room South Wall/Crusher Pit Room
Painted Concrete	1123578	EPL2013-055	16.81	TONS	Portland	48	Emerald Park	7/22/2013	7/22/2013	Concrete Walls	Ingot Storage Room South Wall/Crusher Pit Room
Painted Concrete	1123662	EPL2013-055	18.7	TONS	Portland	50	Emerald Park	7/23/2013	7/23/2013	Concrete Walls	Ingot Storage Room South Wall/Crusher Pit Room
Painted Concrete	1123667	EPL2013-055	16.66	TONS	Portland	48	Emerald Park	7/23/2013	7/23/2013	Concrete Walls	Ingot Storage Room South Wall/Crusher Pit Room
Painted Concrete	1123684	EPL2013-055	18.92	TONS	UPC	311	Emerald Park	7/23/2013	7/23/2013	Concrete Walls	Ingot Storage Room South Wall/Crusher Pit Room
Painted Concrete	1123686	EPL2013-055	15.46	TONS	Portland	49	Emerald Park	7/23/2013	7/23/2013	Concrete Walls	Ingot Storage Room South Wall/Crusher Pit Room
Painted Concrete	1127205	EPL2013-055	18.12	TONS	Portland	50	Emerald Park	8/15/2013	8/15/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Painted Concrete	1127210	EPL2013-055	15.32	TONS	UPC	311	Emerald Park	8/15/2013	8/15/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Painted Concrete	1127234	EPL2013-055	17.36	TONS	Portland	48	Emerald Park	8/15/2013	8/15/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Painted Concrete	1127235	EPL2013-055	19.44	TONS	Portland	49	Emerald Park	8/15/2013	8/15/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Painted Concrete	1127236	EPL2013-055	19.75	TONS	Portland	50	Emerald Park	8/15/2013	8/15/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
Painted Concrete	1127242	EPL2013-055	18.49	TONS	UPC	311	Emerald Park	8/15/2013	8/15/2013	Concrete Walls	Crusher Room, Dross Room Storage Room Walls and Bins
	Total Tonnage Disposed:		**1,080.9**	TONS							

ATTACHMENT B2

WATER AND WASTE DISPOSAL

Attachment B2. Chlorine Pit Oil, Water & Sludge Disposal

Former Wabash Alloys
Connell Aluminum Properties, LLC

Waste Stream	Manifest #	Profile #	Qty	Unit	Hauler	Truck #	Disposal Location	Date Shipped	Date Received	Material Description
Chlorine Pit Oil										
Non-Hazardous Waste Oil	13N03	WS033536	180	GALS	North Shore Environmental	--	Badger Disposal	8/23/2013	8/23/2013	Oil
	Total Gallons Disposed:		**180**	GALS						
Chlorine Pit Water										
Non-Hazardous Water	1124770	EPL2013-114	3,000	GALS	NorthShore	--	Emerald Park	7/30/2013	7/30/2013	Liquid
Non-Hazardous Water	1124796	EPL2013-114	3,000	GALS	NorthShore	--	Emerald Park	7/30/2013	7/30/2013	Liquid
Non-Hazardous Water	1124821	EPL2013-114	3,000	GALS	NorthShore	--	Emerald Park	7/30/2013	7/30/2013	Liquid
Non-Hazardous Water	1124832	EPL2013-114	3,000	GALS	NorthShore	--	Emerald Park	7/30/2013	7/30/2013	Liquid
Non-Hazardous Water	1127732	EPL2013-114	3,000	GALS	NorthShore	--	Emerald Park	8/20/2013	8/20/2013	Liquid
Non-Hazardous Water	1127739	EPL2013-114	1,800	GALS	NorthShore	357	Emerald Park	8/20/2013	8/20/2013	Liquid
Non-Hazardous Water	1128132	EPL2013-114	3,200	GALS	NorthShore	357	Emerald Park	8/23/2013	8/23/2013	Liquid
	Total Gallons Disposed:		**20,000**	GALS						
Chlorine Pit Sludge [(1)]										
Non-Hazardous Soil	1128844	EPL2013-125	15.8	TONS	Advanced Disposal	--	Emerald Park	8/29/2013	8/29/2013	Sludge and non TSCA soil cuttings
	Total Tonnage Disposed:		**15.8**	TONS						

Notes:
1. Sludge treated on-site with sodium hypochlorite to reduce reactive sulfide to non-hazardous levels. Following reactive sulfide confirmation, soil cuttings (9 drums) and sawdust was mixed with sludge from the chlorine pit for solidification materials prior to disposal. Contractor estimated that 3.5 tons of the 15.8 tons was the soil cuttings.

Attachment B2. Waste Water Disposal Summary

Former Wabash Alloys
Connell Aluminum Properties, LLC

Waste Stream	Manifest #	Profile #		Start	End	Qty	Unit	Hauler	Truck #	Disposal Location	Date Shipped / Discharged	Date Received	Material Description	Material Location
Pit Water	--	NOI 13.009	Pump 1[(1)]	574,362	574452	900	Gallons	--	--	MMSD Sanitary Sewer	5/24/2013	5/24/2013	Storm water	Crusher Pit
Pit Water	--	NOI 13.009	Pump 1[(1)]	574,452	577,220	27,680	Gallons	--	--	MMSD Sanitary Sewer	5/30/2013	5/30/2013	Storm water	Crusher Pit
Pit Water	--	NOI 13.009	Pump 1[(1)]	577,220	578,593	13,730	Gallons	--	--	MMSD Sanitary Sewer	5/31/2013	5/31/2013	Storm water	Crusher Pit
Pit Water	--	NOI 13.009	Pump 1[(1)]	578,593	581,964	33,710	Gallons	--	--	MMSD Sanitary Sewer	6/3/2013	6/3/2013	Storm water	Crusher Pit
Pit Water	--	NOI 13.009	Pump 1[(1)]	581,964	585,791	38,270	Gallons	--	--	MMSD Sanitary Sewer	6/4/2013	6/4/2013	Storm water	Crusher Pit
Pit Water	--	NOI 13.009	Pump 1[(1)]	585,791	586,676	8,850	Gallons	--	--	MMSD Sanitary Sewer	6/5/2013	6/5/2013	Storm water	Crusher Pit/Ladle Pit
Pit Water	--	NOI 13.009	Pump 1[(1)]	586,676	588,605	19,290	Gallons	--	--	MMSD Sanitary Sewer	6/11/2013	6/11/2013	Storm water	Ladle Pit
Pit Water	--	NOI 13.009	Pump 1[(1)]	588,605	589,505	9,000	Gallons	--	--	MMSD Sanitary Sewer	6/12/2013	6/12/2013	Storm water	Ladle Pit
Pit Water	--	NOI 13.009	Pump 1[(1)]	589,505	591,806	23,010	Gallons	--	--	MMSD Sanitary Sewer	6/17/2013	6/17/2013	Storm water	Ladle Pit
Pit Water	--	NOI 13.009	Pump 1[(1)]	591,806	592,782	9,760	Gallons	--	--	MMSD Sanitary Sewer	6/18/2013	6/18/2013	Storm water	Ladle Pit/Crusher Pit
Pit Water	--	NOI 13.009	Pump 1[(1)]	592,782	595,056	22,740	Gallons	--	--	MMSD Sanitary Sewer	6/19/2013	6/19/2013	Storm water	Crusher Pit
Pit Water	--	NOI 13.009	Pump 1[(1)]	595,056	595,293	2,370	Gallons	--	--	MMSD Sanitary Sewer	7/8/2013	7/8/2013	Storm water	Ladle Pit
Pit Water	--	NOI 13.009	Pump 1[(1)]	595,293	596,290	9,970	Gallons	--	--	MMSD Sanitary Sewer	7/9/2013	7/9/2013	Storm water	Ladle /Scale Pit
Pit Water	--	NOI 13.009	Pump 1[(1)]	596,290	596,764	4,740	Gallons	--	--	MMSD Sanitary Sewer	7/10/2013	7/10/2013	Storm water	Ladle/Scale Pits
Pit Water	--	NOI 13.009	Pump 1[(1)]	596,764	598,181	14,170	Gallons	--	--	MMSD Sanitary Sewer	7/11/2013	7/11/2013	Storm water	Ladle/Scale Pits
Pit Water	--	NOI 13.009	Pump 2	569,500	570,600	1,100	Gallons	--	--	MMSD Sanitary Sewer	7/11/2013	7/11/2013	Storm water	Ladle/Scale Pits
Pit Water	--	NOI 13.009	Pump 1[(1)]	598,181	600,433	22,520	Gallons	--	--	MMSD Sanitary Sewer	7/12/2013	7/12/2013	Storm water	Crusher Pit
Pit Water	--	NOI 13.009	Pump 2	570,600	602,200	31,600	Gallons	--	--	MMSD Sanitary Sewer	7/12/2013	7/12/2013	Storm water	Crusher Pit
Pit Water	--	NOI 13.009	Pump 1[(1)]	600,433	600,955	5,220	Gallons	--	--	MMSD Sanitary Sewer	7/15/2013	7/15/2013	Storm water	Crusher Pit
Pit Water	--	NOI 13.009	Pump 2	602,200	617,600	15,400	Gallons	--	--	MMSD Sanitary Sewer	7/15/2013	7/15/2013	Storm water	Crusher Pit
Pit Water	--	NOI 13.009	Pump 1[(1)]	600,955	601,868	9,130	Gallons	--	--	MMSD Sanitary Sewer	7/16/2013	7/16/2013	Storm water	Outside Scale Pit
Pit Water	--	NOI 13.009	Pump 2	617,600	617,600	0	Gallons	--	--	MMSD Sanitary Sewer	7/16/2013	7/16/2013	Storm water	Front Outside Scale Pit
					Total Volume Discharged:	**323,285**								

Notes:
1. Pump 1 flow meter readings were multiplied by 10 based on meter requirements.
2. Purge water from site monitoring wells. Drums were tested prior to discharge.

ATTACHMENT C

GENERAL FILL APPROVAL LETTER

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
2300 N. Dr. Martin Luther King, Jr. Drive
Milwaukee WI 53212-3128

Scott Walker, Governor
Cathy Stepp, Secretary
Telephone 608-266-2621
Toll Free 1-888-936-7463
TTY Access via relay - 711

July 19, 2013

Mr. Michael Kellogg
Connell Aluminum Properties
One International Place
Boston, MA 02110

Subject: Request for Approval of Emerald Park Landfill Soil Burrow Source Fill Material Use
Additional Soil Sampling Results
Connell Aluminum Properties, LLC (a.k.a. Former Wabash Alloys Facility)
9100 South 5th Avenue, Oak Creek, WI 53154
FID #: 241379050; BRRTS #: 06-41-560068 & 02-41-553761

Dear Mr. Kellogg:

The Department of Natural Resources (Department) has reviewed the additional information presented in the submittal, *Request for Approval of Emerald Park Landfill Soil Burrow Source Fill Material Use, Additional Soil Sampling Results, Former Wabash Alloys Facility, Oak Creek, WI,* dated July 8, 2013, prepared by Natural Resource Technology (NRT). The submittal was prepared in response to the letter to you from the Department, dated June 26, 2013. In the referenced letter, dated June 26, 2013, the Department requested at least two additional representative soil samples for analytical testing (i.e. one soil sample per 1,000 cubic yards of soil to satisfy the sampling frequency) based on the 2,000 to 3,000 cubic yards of soil being planned to be brought onto the subject site.

The analytical results previously provided for the soils sampled on June 17, 2013, and the results of the current soil samples conducted on June 26, 2013, from the same source area, appear to exhibit similar laboratory analytical results. These results indicated no exceedances of residual contaminant levels (RCLs) other than for arsenic (although the arsenic concentrations are below the Department's background threshold value of 8 mg/kg).

Based on the information provided, the Department approves your request to bring as much as 3,000 cubic yards of soil from the proposed burrow source onto the subject site.

The Department appreciates the efforts you are taking to restore the environment at the subject site. If you have any questions regarding this letter, please contact me at 414.263.8639.

Sincerely,

Eric Amadi

Eric Amadi - Hydrogeologist
Remediation & Redevelopment Program
SER - Milwaukee Service Center

cc: Julie Zimdars - NRT (electronic)
Kathryn Huibregtse - Environ Corporation (electronic)
SER Case File #: 06-41-560068 & 02-41-553761

ATTACHMENT D

NOI 13.009 & DISCHARGE SUMMARY

Preserving The Environment •
Improving Water Quality

May 1, 2013

Mr. Mike Kellogg
Connell Aluminum Properties LLC
One International Place
Boston, MA 02110

Subject: Notice of Intent to Discharge Wastewater 13.009

Dear Mr. Kellogg:

The Milwaukee Metropolitan Sewerage District (MMSD or District) received your Notice of Intent (NOI) for the discharge of stormwater from your facility at 9100 South 5th Avenue, Oak Creek, Wisconsin. A leaking roof has allowed approximately 200,000 gallons of stormwater to accumulate inside the building.

The proposed discharge is approved, according to the following conditions:

(1) All wastewater discharged must comply with the prohibitions and limits established by secs. 11.202 and 11.203, MMSD Rules, which are enclosed. In addition, the total concentration of volatile and semi-volatile organic compounds may not exceed 5 mg/L at any time and the concentration of total suspended solids may not exceed 100 mg/L at any time.

(2) You must use the bag filter and carbon vessel described in the NOI. The rate of discharge must be slow enough to ensure effective treatment. You must sample treated wastewater for PCBs. Discharges may commence only after results are obtained showing compliance. You must provide these results to the District before the commencement of discharge.

(3) **Discharge is prohibited during rain** and within 24 hours after the site receives one-half inch or more of rain.

(4) You must determine the total volume discharged. For this purpose, you may use either a totalizing meter or calculations using pump capacity and operating time. You must report the total volume discharged within 5 days after the conclusion of discharges.

(5) The District must receive $250 for reviewing the NOI, according to the District's *Cost Recovery Procedures Manual*, page 11-2. In addition, if the total volume discharged exceeds 50,000 gallons, then the District must receive sewer user charges at a rate

of $2.50 per thousand gallons, according to the *Cost Recovery Procedures Manual*, page 11-5. The District will issue a bill after receiving the report required by Condition (4) above.

(6) At any time when wastewater treatment or discharge is occurring, the District must have access to the site for inspection or sampling.

(7) Mr. David Wozniak of the District's sampling staff must receive notice of the commencement of discharge. Contact Mr. Wozniak at 414-325-5136 or dwozniak@mmsd.com.

If you have questions, please contact Harvey Matyas at 414-225-2164 or hmatyas@mmsd.com. Thank you for your cooperation.

Sincerely,

Peter R. Topczewski
Director of Water Quality Protection

Enclosure

c: Oak Creek

Subchapter II – Discharge Regulations

11.201 General Prohibitions

(1) Compliance with Rules

Users may not discharge to the sewerage system except in compliance with this chapter.

(2) Interference

Users may not discharge any pollutant to the sewerage system in a quantity or concentration that, alone or in conjunction with other discharges:

(a) inhibits or disrupts the sewerage system or its sludge processes; and

(b) 1. causes a violation of the District's WPDES permits or air pollution control permits;

2. increases the magnitude or duration of a violation;

3. prevents the use or disposal of sewage sludge in compliance with any applicable local, state or federal statutes, ordinances regulations, permits, or other requirements; or

4. inhibits the marketing of treated sewage sludge.

(3) Pass Through

Users may not discharge to the sewerage system any pollutant in a quantity or concentration that, alone or in conjunction with other discharges, is a cause of a discharge from the sewerage system to waters of the state that violates the District's WPDES permits or increases the magnitude or duration of a violation.

11.202 Prohibited Discharges

Users may not discharge to the sewerage system:

(1) pollutants that create a fire or explosion hazard in the sewerage system, including but not limited to pollutants that result in wastewater with a closed cup flashpoint of less than 140 F or 60C;

(2) pollutants that will cause corrosive structural damage to the sewerage system, including but not limited to discharges with a pH lower than 5.0 s.u.;

(3) solid or viscous pollutants that will obstruct the flow in the sewerage system;

(4) heat in amounts that will cause interference by inhibiting the biological activity in the treatment plant, including but not limited to heat in an amount that causes the influent of the treatment plant to exceed 40 C (104 F);

(5) used motor vehicle anti-freeze, motor oil, brake fluid, transmission fluid, hydraulic fluid, oil-based paint, and paint thinners if the material is in a collectable and recyclable quantity or if the discharge would result in a violation of the oil and grease limit set forth in sec. 11.203(1);

(6) pollutants that result in the presence of toxic gases, vapors, or fumes within the sewerage system in a quantity that may cause acute worker health and safety problems;

(7) hauled waste, except for hauled waste that:

(a) consists only of domestic wastewater, and

(b) is discharged at a point designated by the District;

(8) any substance that will cause the sewerage system's treatment residues, sludge's, or scum's to be unsuitable for reclamation and reuse, that causes interference with the reclamation process, or that inhibits the marketing of treated sewage sludge;

(9) any wastewater that contains radioactivity in amounts greater than a drinking water standard established by the U.S. Environmental Protection Agency or the Department;

(10) at any site that is either served by a separate storm water conveyance system or riparian to waters of the state:

(a) storm water, surface water, or groundwater, except when a remedial action undertaken according to the requirements of the Department or the U.S. Environmental Protection Agency requires the removal of this type of water and a direct discharge to waters of the state would impose unreasonable costs or delays;

(b) roof runoff;

(c) subsurface drainage;

(d) single-pass cooling water, cooling tower blowdown, or reverse osmosis concentrate, except as provided in subpar 1 and 2:

1. If a storm sewer is not available, then a user may discharge cooling tower blowdown and reverse osmosis concentrate from December 1 to March 31 and any other period when necessary to protect the public health, welfare, or safety.

2. Users may discharge single-pass cooling water from small-scale bench-top condensers, except as provided in par. (e)(2).

(e) from sources constructed after May 1, 2005:

1. condensate from compressed air or process steam systems, and

2. single-pass cooling water from small-scale bench-top condensers; or

(f) any other wastewater for which the Department has issued a general WPDES permit;

(11) any non-domestic wastewater before the District has approved a *Notice of Intent* submitted according to sec. 11.401;

(12) any mass, concentration, or volume of a substance in excess of the amount allowed in the user's Wastewater Discharge Permit; and

(13) The following pollutants, except as provided in pars. (b), (c), and (d):

Acrolein	Furans
Alkylated lead	Heptachlor
Benzo(a)Pyrene	Hexachlorobenzene
Chlordane	Lindane (BHC)
Dieldrin	Mirex
Dioxins	Pentachlorobenzene
3,3'-Dichlorobenzidine	Polybrominated biphenyl ethers
4,4'-Dichlorodiphenyltrichloroethane (DDT)	Polychlorinated biphenyls (PCBs)
Endosulfan	1,2,4,5-Tetrachlorobenzene
Endrin	Toxaphene
Fluoranthene	2,4,6-Trichlorophenol

(b) amounts allowed by an applicable categorical pretreatment standard;

(c) amounts occurring in landfill leachate after implementation of the best available treatment technology economically achievable, according to a limit established in a wastewater discharge permit;

(d) amounts caused by sources beyond the reasonable control of the user, such as contamination in the water supply, air deposition, or raw materials

11.203 Local Limits

(1) (a) Users may not discharge into the sewerage system any process wastewater containing concentrations of pollutants greater than the following limits, except as provided in sec. 11.213 and sec. 11.214(12):

Pollutant	**Limit (mg/L)**
Ammonia	224[1]
Arsenic, total	0.6
Cadmium, total	1.5
Chromium, total	64
Copper, total	6.0
Lead, total	2.0
Mercury, total	0.0026
Molybdenum, total	12
Nickel, total	4.0
Silver, total	5.8
Zinc, total	8.0
Cyanide, total	2.9
Hexane extractable materials[2]	300

(1) This limit applies only to discharges normally tributary to the South Shore Wastewater Treatment Facility.

(2) This limit applies to results obtained using Method 1664, as established by 40 CFR 136.

Table N1. 2013 Waste Water Summary

Former Wabash Alloys
Connell Aluminum Properties, LLC

Waste Stream	Manifest #	Profile #		Start	End	Qty	Unit	Hauler	Truck #	Disposal Location	Date Shipped / Discharged	Date Received	Material Description	Material Location
Pit Water	--	NOI 13.009	Pump 1	574,362	574452	900	Gallons	--	--	MMSD Sanitary Sewer	5/24/2013	5/24/2013	Storm water	Crusher Pit
Pit Water	--	NOI 13.009	Pump 1	574,452	577,220	27,680	Gallons	--	--	MMSD Sanitary Sewer	5/30/2013	5/30/2013	Storm water	Crusher Pit
Pit Water	--	NOI 13.009	Pump 1	577,220	578,593	13,730	Gallons	--	--	MMSD Sanitary Sewer	5/31/2013	5/31/2013	Storm water	Crusher Pit
Pit Water	--	NOI 13.009	Pump 1	578,593	581,964	33,710	Gallons	--	--	MMSD Sanitary Sewer	6/3/2013	6/3/2013	Storm water	Crusher Pit
Pit Water	--	NOI 13.009	Pump 1	581,964	585,791	38,270	Gallons	--	--	MMSD Sanitary Sewer	6/4/2013	6/4/2013	Storm water	Crusher Pit
Pit Water	--	NOI 13.009	Pump 1	585,791	586,676	8,850	Gallons	--	--	MMSD Sanitary Sewer	6/5/2013	6/5/2013	Storm water	Crusher Pit/Ladle Pit
Pit Water	--	NOI 13.009	Pump 1	586,676	588,605	19,290	Gallons	--	--	MMSD Sanitary Sewer	6/11/2013	6/11/2013	Storm water	Ladle Pit
Pit Water	--	NOI 13.009	Pump 1	588,605	589,505	9,000	Gallons	--	--	MMSD Sanitary Sewer	6/12/2013	6/12/2013	Storm water	Ladle Pit
Pit Water	--	NOI 13.009	Pump 1	589,505	591,806	23,010	Gallons	--	--	MMSD Sanitary Sewer	6/17/2013	6/17/2013	Storm water	Ladle Pit
Pit Water	--	NOI 13.009	Pump 1	591,806	592,782	9,760	Gallons	--	--	MMSD Sanitary Sewer	6/18/2013	6/18/2013	Storm water	Ladle Pit/Crusher Pit
Pit Water	--	NOI 13.009	Pump 1	592,782	595,056	22,740	Gallons	--	--	MMSD Sanitary Sewer	6/19/2013	6/19/2013	Storm water	Crusher Pit
Pit Water	--	NOI 13.009	Pump 1	595,056	595,293	2,370	Gallons	--	--	MMSD Sanitary Sewer	7/8/2013	7/8/2013	Storm water	Ladle Pit
Pit Water	--	NOI 13.009	Pump 1	595,293	596,290	9,970	Gallons	--	--	MMSD Sanitary Sewer	7/9/2013	7/9/2013	Storm water	Ladle /Scale Pit
Pit Water	--	NOI 13.009	Pump 1	596,290	596,764	4,740	Gallons	--	--	MMSD Sanitary Sewer	7/10/2013	7/10/2013	Storm water	Ladle/Scale Pits
Pit Water	--	NOI 13.009	Pump 1	596,764	598,181	14,170	Gallons	--	--	MMSD Sanitary Sewer	7/11/2013	7/11/2013	Storm water	Ladle/Scale Pits
Pit Water	--	NOI 13.009	Pump 2	569,500	570,600	1,100	Gallons	--	--	MMSD Sanitary Sewer	7/11/2013	7/11/2013	Storm water	Ladle/Scale Pits
Pit Water	--	NOI 13.009	Pump 1	598,181	600,433	22,520	Gallons	--	--	MMSD Sanitary Sewer	7/12/2013	7/12/2013	Storm water	Crusher Pit
Pit Water	--	NOI 13.009	Pump 2	570,600	602,200	31,600	Gallons	--	--	MMSD Sanitary Sewer	7/12/2013	7/12/2013	Storm water	Crusher Pit
Pit Water	--	NOI 13.009	Pump 1	600,433	600,955	5,220	Gallons	--	--	MMSD Sanitary Sewer	7/15/2013	7/15/2013	Storm water	Crusher Pit
Pit Water	--	NOI 13.009	Pump 2	602,200	617,600	15,400	Gallons	--	--	MMSD Sanitary Sewer	7/15/2013	7/15/2013	Storm water	Crusher Pit
Pit Water	--	NOI 13.009	Pump 1	600,955	601,868	9,130	Gallons	--	--	MMSD Sanitary Sewer	7/16/2013	7/16/2013	Storm water	Outside Scale Pit
Pit Water	--	NOI 13.009	Pump 2	617,600	617,600	0	Gallons	--	--	MMSD Sanitary Sewer	7/16/2013	7/16/2013	Storm water	Front Outside Scale Pit
Purge Water	--	NOI 13.009	Pump 1	no reading	no reading	125	Gallons	--	--	MMSD Sanitary Sewer	8/6/2013	8/6/2013	Storm water	Purge Water
					Total Volume Discharged:	**323,285**								

Notes:
1. Flow meter readings were multiplied by 10 based on meter requirements.
2. Purge water from site monitoring wells. Drums were tested prior to discharge.