State of Wisconsin Substance Release Notification Form
Department of Natural Resources Form 4400-91 (Rev. 12-04, e-form)
24-Hour Emergency Hotline Number: 1-800-943-0003

04-71-548006

Date & Military Time of Incident: 04/11/06 hrs	**Date & Military Time Reported:** 04/11/06 1100hrs	**Spill File #** **BRRTS #**
Person Reporting: Shari Klika	**Representing:** Alcan Packaging	**Phone #** 920-727-6021 Office (O) **Fax #**
Responsible Party (RP) / Spiller: Alcan Packaging	**RP Decision Based On:**	**Phone #** **Fax #**
RP Address: 271 River St.		**City** Menasha **State** WI **Zip Code**
RP Contact Name & Title: Shari Klika		**Phone #** **Fax #**
Substance Involved: Mercury	**Amount & Units Released:** 1 tabelspoon	**Amount & Units Recovered:** all

☐ Solid ☐ Semisolid ☒ Liquid ☐ Gas Color: Odor:

Exact Location Of Incident: (including street name, bldg. #, mileage, etc.) 271 River St. in the Red Label Building	**Facility Name / Property Owner:** Alcan Packaging

☒ **City** ☐ **Village** ☐ **Township** Menasha	**County** Winnebago	**Latitude/Longitude** deg. ' '', deg. ' ''
DNR Region: NER	**1/4 1/4 Sec T N R** ☐ **E** ☐ **W**	**Weather Conditions:**

Cause of Incident:
Faulty Mercury gauges leaked

Spilled Substance Impact To: (check X all that apply)
- ☐ Air ☐ Potential
- ☒ Concrete/Asphalt ☐ Potential
- ☐ Contained/Recovered
- ☐ Groundwater ☐ Potential
- ☐ Private Well ☐ Potential
- ☐ Sanitary Sewer ☐ Potential
- ☐ Soil ☐ Potential
- ☐ Storm Sewer ☐ Potential
- ☐ Surface Water ☐ Potential
  Name:
- ☒ Other: Contained Inside the Building

Spill Cause and/or Site:
- ☐ Ag Coop/Food Factory
- ☐ Airport Facility ☐ Railroad Facility
- ☐ Construction, Excavation, Wrecking, Quarry, Mine
- ☐ Gas/Service Station/Garage/Auto Dealer/Repair Shop
- ☐ Hydraulic Line Break
- ☒ Industrial Facility ☐ Paper Mill ☐ Chemical Co.
- ☐ Pipeline/Terminal/Tank Farm/Oil Jobber/Wholesaler
- ☐ Private Property (home/farm)
- ☐ Public Property (city, state, church, school, etc.)
- ☐ Transportation Accident, Fuel Tank Spill
- ☐ Transportation Accident, Load Spill
- ☐ Utility Co. Power Generating/Transfer Facility
- ☐ Other:

Action Taken By Spiller:
- ☐ Cleanup Method:
  - ☒ Absorbent
  - ☐ Excavation
  - ☒ HgX
- ☐ Containment
- ☒ Contractor Hired
  Name: Onyx Special Services
- ☐ Monitor
- ☐ No Action Needed
- ☐ No Action Taken
- ☒ Waste Destination: Onyx
- ☐ Other:

Injuries? ☐Yes ☒No If yes how many? **Has An Evacuation Occurred?** ☐Yes ☒No **Potential?** ☐Yes ☒ No

Are There Any Resource Damages? ☐Yes ☒No ☐ Potential **What Kind?**

Other Agencies Notified: (check first column, if notified; check both columns, if on the scene)

☐ ☐ Fire Department	☒ ☐ Local DNR	☐ ☐ EPA
☐ ☐ Local Law Enforcement	☐ ☐ Div. Emerg. Mgt.	☐ ☐ Nat'l Resp Ctr 800-442-8802
☐ ☐ LEPC or Local Emer. Mgt.	☐ ☐ Coast Guard	☐ ☐ Chemtrec 800-424-9300
☐ ☐ Level A/Level B Team	☐ ☐ DHFS 608-258-0099	☐ ☐ Other:

Incident Commander:

Phone #

Prepared By: Jason Moeller	Phone # 920-662-5492	Date: 04/11/06	Rpt'd To DATCP? ☐Yes ☒No Date: Tnsfed. To DATCP ☐Yes ☒No Date:
Person Notified: Jason Moeller	Phone # 920-662-5492	Date: 04/11/06 Time: 1100	Spill Packet Sent? ☒Yes ☐No Date: 04/11/06 To: shari.klika@alcan.com
Investigated By:	Sign:	Date:	Transferred to ERP ☐Yes ☒No Date: Case #
Spill Coordinator Signoff: Jason W Moeller		Date: 09/05/06	NFA Letter Sent? ☐Yes ☒No Date: Incident Closed? ☒Yes ☐No Date: 09/05/06

☒ See Additional Comments On Reverse (Please, print page 2 of 2)

State of Wisconsin Substance Release Report (Cont'd)
Form 4400-91 (Rev 12-04, e-form)

Date and Military Time Of Incident: 04/11/06 hrs	**Responsible Party:** Alcan Packaging

Additional Comments : The spill occurred in the Red Label Building, an outbuilding behind the main plant. The mercury was contained in a small room in the building. Some old gauges in the room leaked mercury onto the concrete floor. There are also 3 small containers with elementary mercury in them, that will be properly disposed of by Onyx. Eric Raduenz (Onyx project manager) is on site cleaning up the spilled mercury. The cleanup material and mercury will be properly containerized and disposed of by Onyx.

Klika will send final report to Moeller.

08/31/06, Moeller received clean up report.

Case Activity Report: ☐ Yes ☒ No CAR#: (Please, attach copy of all CAR and other documentation).

Enforcement Action: ☐ Yes ☒ No (Explain Below)

Moeller, Jason W - DNR

From: shari.klika@alcan.com
Sent: Thursday, August 31, 2006 3:23 PM
To: Moeller, Jason W - DNR
Subject: Report

Attachments: 490157B.06.039 Alcan Packaging.pdf

490157B.06.039
Alcan Packaging...

Jason,

Attached please find a copy of the remediation report for our April 2006 mercury spill. Any questions, give me a call. Thanks.

Shari Klika
EHS Manager, Menasha Plant
office: (920) 727-6021
fax: 727-6383

----- Forwarded by Shari Klika/Alcan on 08/31/2006 03:21 PM -----

Eric C Raduenz <ECRADUENZ@onyxsp.com>	To:	shari.klika@alcan.com
	cc:	
	Subject:	Report
05/08/2006 04:06 PM		

I will be sending the profiles, shortly. Thanks Eric Raduenz Project Manager ONYX Special Services, Inc
Work: (920) 830-5511
Cell: (920) 960-3952
Fax: (920) 749-8110
In 2006, ONYX becomes Veolia Environmental Services (See attached file: 490157B.06.039 Alcan Packaging.pdf)

Notice:
This message and any attachments are the property of Alcan and are intended solely for the named recipients or entity to whom this message is addressed. If you have received this message in error please inform the sender via e-mail and destroy the message. If you are not the intended recipient you are not allowed to use, copy or disclose the contents or attachments in whole or in part.

INCIDENT RESPONSE REPORT

Prepared for

ALCAN Packaging

ONYX JOB # 490157B.06.039

RESPONSE DATE: 04-11-06

Prepared by

Eric Raduenz
Project Manager

Onyx Special Services, Inc.
Emergency Service Group
Tel: 800-688-4005
www.onyxsp.com

ONYX

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Appendix E Disposal Documentation

ONYX

INCIDENT SUMMARY

NOTIFICATION DATE:	04-11-2006
TIME NOTIFIED:	0900
NOTIFIED BY:	Shari Klika EHS, Menasha Plant
INCIDENT LOCATION:	271 River Street Menasha, WI 54952
CONTACT:	Shari Klika
INCIDENT TYPE:	Spill
SUBSTANCE:	Mercury
SOURCE:	Vacuum Gauges
WASTE GENERATED:	(1) One 55 gallon steel drum of mercury debris (1) One 5 gallon DOT pail containing elemental mercury

ONYX

INCIDENT NARRATIVE

On April 11th, 2006 Onyx Special Services (Onyx) Emergency Dispatch was called by Shari Klika of Alcan Packaging regarding a mercury spill. The spill occurred at Alcan Packaging, 271 River Street in the City of Menasha, Winnebago Wisconsin. It was requested that Onyx respond, mitigate and dispose of the contaminated waste.

Upon arrival to site Onyx was briefed by Shari Klika. A vacuum gauge containing mercury had malfunctioned and dispersed mercury inside of a metal cabinet and surrounding floor. An initial mercury screening was conducted utilizing a VM 3000 meter. A VM 3000 has a detection limit of 0.1 ug/m³ for mercury vapor. Results are located in Appendix D. The cabinet had large mercury beads on the gauges, base of the cabinet, and floor. Pictures were taken and a meeting was held with Shari Klika. Upon completion, Onyx established a decontamination pad and initiated clean up operations. The accepted standard for mercury vapor for occupational and commercial settings where mercury is handled is 25 ug/m³. Please refer to Mercury Action Levels used to determine successful clean up.

Eric Raduenz and two technicians began to clean the main spill area by using a mercury vacuum to collect large beads of mercury. The floor and cabinet was further decontaminated with a mercury amalgamation solution. The amalgamation solution was a mixture of HgX powder and water. HgX is a non-hazardous, water-soluble agent that reacts rapidly, forming a film over nearly invisible beads of mercury and reacting to produce a non-vaporizing sulfide using a chelating agent. Please reference Appendix B for an MSDS for HgX. A VM 3000 mercury vapor analyzer was utilized to monitor the progress. An evacuation fan was utilized to clear mercury vapor from the room. The room was secured and closure monitoring data was obtained. The mercury vapor reading inside of the room was found to be within ASTDR acceptable levels. The bottom seam of the cabinet had an elevated vapor level. Sections of the seam were not caulked resulting in trapped mercury beads. The only way to remove the beads was to dismantle sections of the cabinet. This was briefed to Shari Klika. Due to the amount of gauges in the cabinet, Shari Klika stated she would brief the management of ALCAN Packaging and inform Onyx on a mitigation decision. All waste was contained into one 55 gallon steel drum and one 5 gallon Department of Transportation (DOT) pail. The waste was properly labeled and remained on site pending profiling.

On April 26th, 2006 all waste was transported to Onyx Environmental Services in Port Washington, WI for disposal. This concludes Onyx's activities in regards to this response.

All information presented in this report has been submitted with good intent and to the best of my knowledge.

MERCURY VAPOR ACTION LEVELS

The Occupational Safety and Health Administration (OSHA) has set limits of 0.1 milligram of organic mercury per cubic meter of workplace air (0.1 mg/m³) and 0.05 mg/m³ of metallic mercury vapor for 8-hour shifts and 40-hour work weeks.

The Agency for Toxic Substances and Disease Registry, (ASTDR) "Suggested Action Levels for Indoor Mercury Vapors in Homes or Businesses with Indoor Gas Regulators", recommends 10

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$\mu g/m^3$ (or 0.010 mg/m^3) a proper action level for considering articles of clothing to be contaminated.

Additional information and methodology for the recommended action levels can be found at the ASTDR web site.

http://www.atsdr.cdc.gov/HAC/PHA/resmerc/nic_p1.html#recom

Please note that OSHA standards show mercury levels in mg/m^3 and ASTDR recommendations are shown in ug/m^3.

REPORT COMPLETED BY: Eric Raduenz – Project Manager

DATE: April 27, 2006

REPORT REVIEWED BY: Jon Zielieke – Division Manager

DATE: April 27, 2006

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Emergency Service Group
Tel: 800-688-4005
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VEOLIA ENVIRONNEMENT

Appendix A

Map of Spill Site

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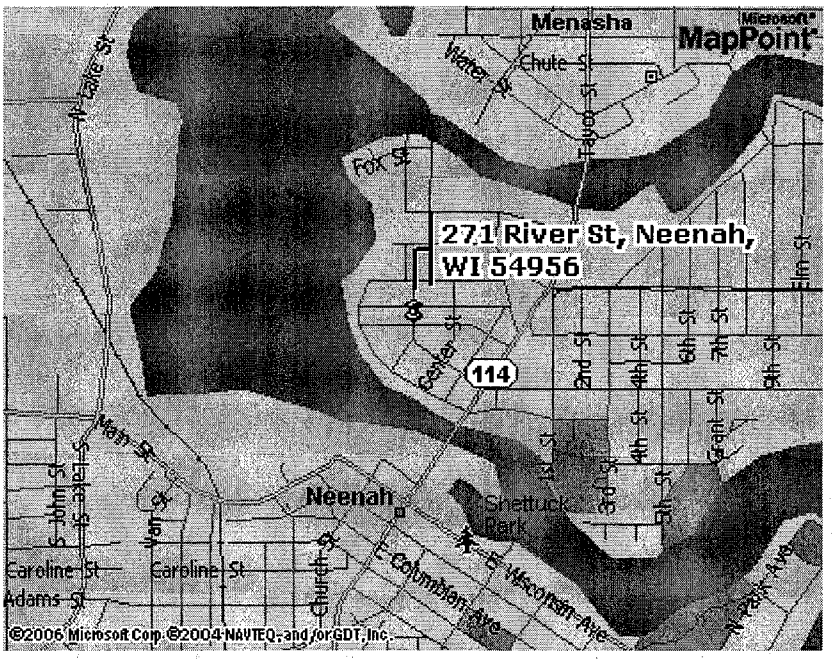
ONYX JOB # 490157B.06.039

RESPONSE DATE: 04-11-06



ALCAN Packaging

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Appendix B

HgX MSDS

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VEOLIA
ENVIRONNEMENT

Appendix C

Photographic Documentation

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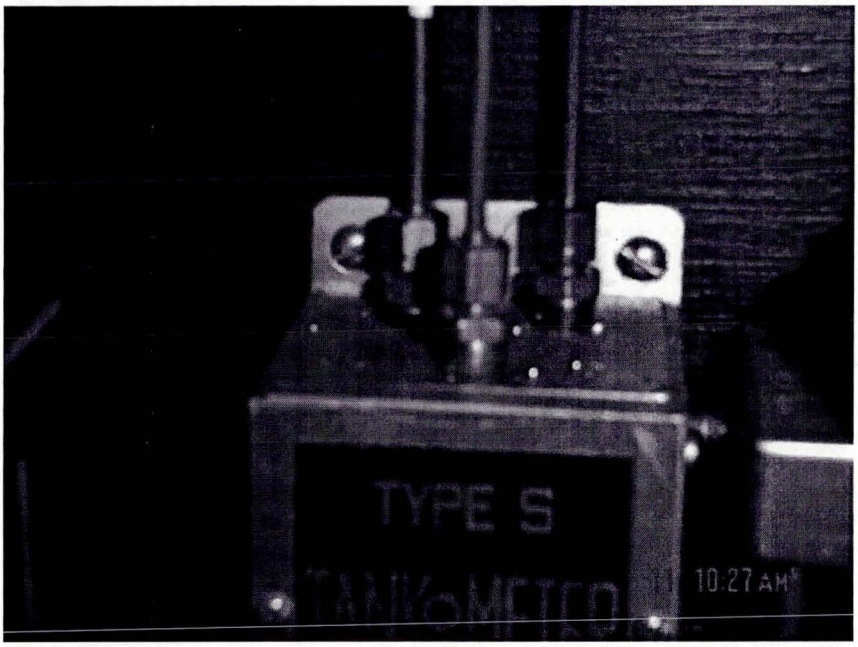

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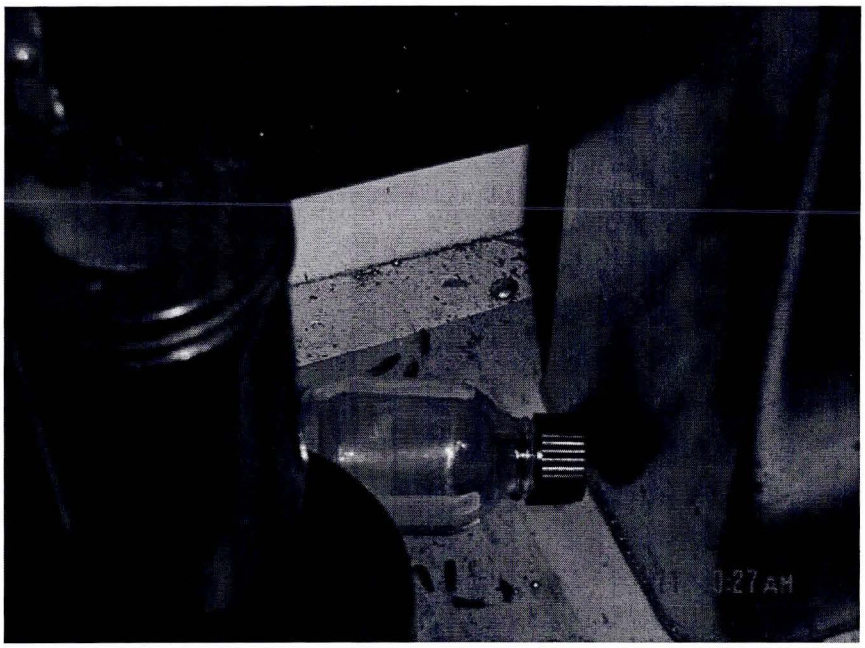

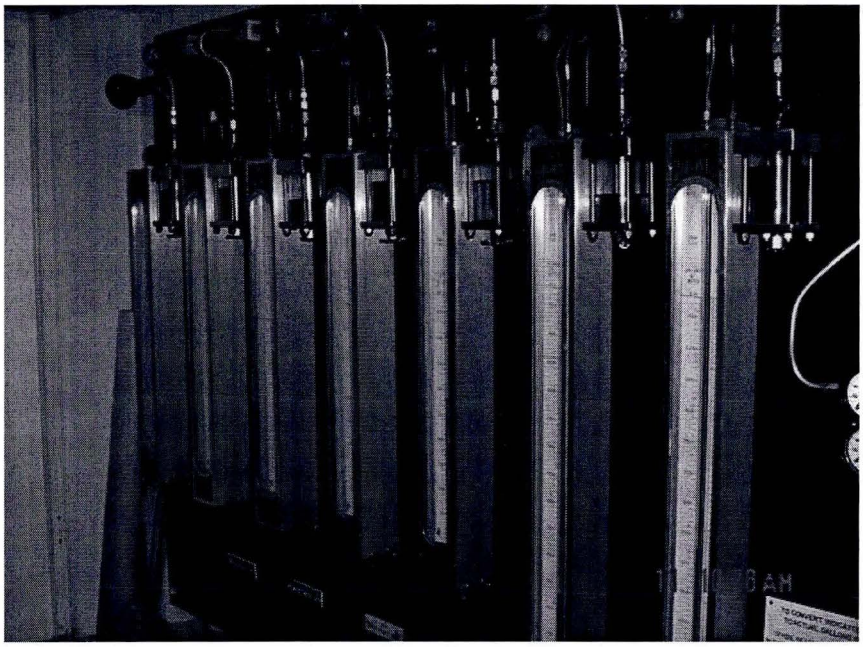

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Appendix D

VM 3000 Monitoring Report

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www.onyxsp.com

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VM 3000 Monitoring Report

Time: 1111 Job No.: B.06.039 Date: 4-11-06

Address: 271 RIVER ST
City: MENASHA, WI
Inspector: RADUENZ
Company: ONYX
VM 3000 Meter Serial Number: 0090/105
Internal Filter Changed : 3-13-06

Reason For Screening:
X Possible Interference
___ Post Cleaning Screen

Are fans shut off? Yes or No If the answer is No, turn the fans off.
Are windows closed in the home? Yes or No If the answer is No, shut the windows
Is the ventilation system turned on in the house? Yes or No If the answer is No, turn the ventilation system on.
Is the temperature in the house above 70 degrees Fahrenheit? If the answer is No, turn the heat up.

Sample number	Location	Reading in micrograms/cubic meter* (ug/m³)	Notes
1	DOOR	2.0	FLOOR
2	ROOM CENTER	3.1	RESPIRATORY
3	ROOM CENTER	4.2	FLOOR
4	CABINET	10.2	MID
5	CABINET	3.7	RESPIRATORY
6	CABINET	9.0	BASE
7	CABINET	2.7	TOP

Note: All VM 3000 readings should be taken in the respiratory zone unless special considerations are required.* A VM 3000 meter reading of 3.0 ug/m³ corresponds to a Jerome meter reading of 0.003 mg/m³. Residential Standard 0.003 mg/m³, Industrial Standard=0.010mg/m³. Reading above 3.0 ug/m³ exceeds Residential standard. Reading above 10 ug/m³ standards exceeds Industrial Standard.

The information provided in this document is privileged and confidential and to be used or released only with written permission from Superior Special Services, Inc.

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VEOLIA ENVIRONNEMENT

ONYX

VM 3000 Monitoring Report

Time: 1415 Job No.: B.06.039 Date: 4-11-06

Address: 271 RIVER ST
City: MENASHA, WI
Inspector: RADVIONZ
Company: ONYX
VM 3000 Meter Serial Number: 0090/105
Internal Filter Changed : 3-13-06

Reason For Screening:

___ Possible Interference

X Post Cleaning Screen

Are fans shut off? Yes or No If the answer is No, turn the fans off.
Are windows closed in the home? Yes or No If the answer is No, shut the windows
Is the ventilation system turned on in the house? Yes or No If the answer is No, turn the ventilation system on.
Is the temperature in the house above 70 degrees Fahrenheit? If the answer is No, turn the heat up.

Sample number	Location	Reading in micrograms/cubic meter* (ug/m³)	Notes
1	DOOR	0	FLOOR
2	CENTER	.4	ROOM — FLOOR
3	CENTER	.7	ROOM — RESPIRATORY
4	CABINET	2.6	FLOOR
5	CABINET	2.3	RESPIRATORY
6	INSIDE CABINET	8.0	BASE
7	INSIDE CABINET	1.3	RESPIRATORY
8	INSIDE CABINET	93	STEAM

Note: All VM 3000 readings should be taken in the respiratory zone unless special considerations are required.* A VM 3000 meter reading of 3.0 ug/m³ corresponds to a Jerome meter reading of 0.003 mg/m³. Residential Standard 0.003 mg/m³, Industrial Standard=0.010mg/m³. Reading above 3.0 ug/m³ exceeds Residential standard. Reading above 10 ug/m³ standards exceeds Industrial Standard.

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Appendix E

Disposal Documentation

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SEE INSTRUCTIONS ON REVERSE SIDE OF COPY 6.

STATE OF WISCONSIN
Chapter 144, Wis. Stats.
Form 4400-66P Rev. 3-97

ALL COPIES MUST BE LEGIBLE, PLEASE TYPE

State of Wisconsin
Department of Natural Resources
Bureau of Solid and Hazardous Waste Mgt.
Box 8094
Madison, Wisconsin 53708

FOR DNR USE ONLY

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

Form Approved. OMB No. 2050-0039. Expires 9-30-99

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: WID006119978
Manifest Document No.: 777793
2. Page 1 of
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
ALCAN PACKAGING
271 RIVER ST
MENASHA, WI
4. Generator's Phone (920) 727-6021

Site Location If Different

A. State Manifest Document Number: WI 1799795
B. State Generator's ID
C. State Transporter's ID
D. Transporter's Phone (262) 512-1000
E. State Transporter's ID
F. Transporter's Phone
G. State Facility's ID
H. Facility's Phone (262) 283-5700

5. Transporter 1 Company Name: ONYX SPECIAL SERVICES
6. US EPA ID Number: WIR000120592
7. Transporter 2 Company Name
8. US EPA ID Number

9. Designated Facility Name and Site Address
ONYX ENVIRONMENTAL SERVICES
1275 MINERAL SPRINGS DRIVE
PORT WASHINGTON, WI 53074
10. US EPA ID Number: WID988566543

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. HAZARDOUS WASTE SOLID, NOS, 7, NA3077, PG III	001	DM	010110	P	
b. MERCURY, 8, UN2809, PG III	001	DF	010015	P	
c.					
d.					

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

15. Special Handling Instructions and Additional Information
EMERGENCY CONTACT (800) 688-4005
JOB # 490157 B 06039
ERG # 171
ELEMENTAL MERCURY 302074
MERCURY DEBRIS 302075
SALES # 287407
PO# 75702

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: [illegible]
Signature: [illegible]
Date: Month Day Year

17. TRANSPORTER 1 Acknowledgement of Receipt of Materials
Printed/Typed Name & Position Title: EL RAMIREZ DM
Signature: [illegible]
Date: Month Day Year 11/21/01

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

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 Telephone Number
In Wisconsin (608) 266-3232
Outside Wisconsin (800) 424-8802

COPY 3-
FACILITY SEND TO WIS. DNR

Onyx Special Services, Inc.
Emergency Service Group
Tel: 800-688-4005
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VEOLIA ENVIRONNEMENT