

Interoffice Communication

To Distribution
 From M. G. Hayes
 Date December 12, 1980
 Subject Compliance with Hazardous Waste Regulations

The Resource Conservation and Recovery Act (RCRA) regulations of May 19, 1980, establish guidelines and requirements for all phases of hazardous waste handling. These "cradle to grave" regulations place requirements on generation, treatment, storage, transportation, and disposal of hazardous wastes.

The program which must be implemented to comply with the regulations for the LCCP is divided into three sections:

- Part I - Key of Hazardous Wastes and Handling Practices
- Part II - Hazardous Waste Drum Storage Program
- Part III - Inspection, Reporting, and Records

These parts are attached. They apply to any operation which generates a hazardous waste or has a potential for spillage of product which constitutes a hazard.

In compliance with the requirements of the law, we provided notification to EPA on August 19, 1980 of our hazardous waste activities. This essentially notified EPA that we did generate and handle hazardous wastes, and that LCCC would be a part of the waste management system. On November 19, we provided the required permit application, which gave specific information on the hazardous wastes which were generated on site and our means of handling them. The hazardous wastes that we reported were listed according to EPA criteria or because the waste was on the EPA list of hazardous wastes. Sampling and analysis was performed to verify our listing of a waste according to the EPA criteria. The requirements of Parts I, II, and III are based upon the specific regulations which apply to the waste or waste handling facility.

The manifest program and requirements, per M. G. Hayes' memo of November 14, 1980, must continue to be used for all wastes shipped offsite using approved haulers (see Mike Hayes memo of November 18). Although this Hazardous Waste Management Program is directly aimed at hazardous wastes, all wastes generated may be handled in a consistent manner. The object is to institute a hazardous waste management system which provides all necessary waste tracking and reporting in a consistent program in such a way that operations time and cost are minimized.

The Act provides both civil and criminal penalties for noncompliance. The civil penalties may reach up to \$25,000 per day of noncompliance,

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criminal penalties may also reach \$25,000 per day with possible imprisonment upon conviction. Civil penalties would be assessed against the company, criminal penalties apply to the person convicted.

All phases of the program which are attached must be implemented and operating by December 31, including return of all information which I need. This will include the location of the hazardous waste drum storage areas, the facility inspection reports developed, and locations of the recordkeeping. This program, however, is by no means the final word in hazardous waste management. If you have ideas, or problems, which may lead to better handling, or a better system of waste management, please contact Jack Neeld or myself and we will be happy to discuss and incorporate these ideas.

M. G. Hayes

M. G. Hayes

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Attachments

Distribution

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CWH 000009239

I. HAZARDOUS WASTES AND THEIR HANDLING

Attachment I-1 is a list of those wastes, by operating unit, which were reported as hazardous. The letters in the Handling Code column opposite the waste identify the proper handling options available, which are listed on the key which follows the list. The instructions for each option must be followed explicitly. Any deviance or omissions could affect our compliance position.

Certain of the hazardous wastes are raw materials or products which become hazardous wastes only due to a spill. The list shows in what form or under what circumstances the substance listed is a hazardous waste.

A number of these situations are covered under separate procedures; i.e., the Spill Control and Countermeasure Plan (SPCC). These instructions follow those procedures; the hazardous waste instructions provide additional guidance to complete whatever is necessary to comply under RCRA, in addition to any other requirements.

For spills, the quantities of hazardous wastes spilled into the wastewater system must be reported using the spill report. These procedures are spelled out in the Pollution Control Manual. This is also to include those discharges to the wastewater system of materials which are collected and then dumped to the system (for example, a kerosene spill emptied into the API separator serving the slop oil system). The spill reports filed for the hazardous wastes named will form the basis of records which show treatment of hazardous wastes.

Do not deviate from these handling procedures for a hazardous waste without first checking with the Director of Environmental Control. If you feel a waste should be handled differently than listed, please work out the differences prior to disposing of the material.

CWH 000009240

ATTACHMENT I-1

ETHYLENE, STEAM PLANT, AND OFFSITES

<u>HAZARDOUS WASTE</u>	<u>HANDLING CODE</u>
1. Nalco 354 (spills)	(a) (d)
2. Nalco 5202 (spills)	(a) (d)
3. Nalco 7105 (spills)	(a) (d)
4. Betz 242 (spills)	(a) (d)
5. Betz 45 (spills)	(a) (d)
6. Betz 419 (spills)	(a) (d)
7. Caustic (spent and spills)	(b) (d)
8. Alum (spills)	(b) (d)
9. Phosphoric Acid (spills)	(b) (d)
10. Asbestos Insulation	(h)
11. Stormwater Diversion Pond Solids	(c)
12. Holding Pond Inlet Box Solids	(c) (1)
13. Ethylene-Alcohol API Separator Solids	(c) (1)
14. Charge Gas Dryer Sieves (spent)	(d) (e)
15. Oil Emulsion Solids	(c) (f)
16. Light Aromatic Distillate (spills)	(a) (d)
17. Merox (spills)	(a) (d)
18. Sulfuric Acid (spills)	(b) (d)
19. Ammonium Hydroxide (spills)	(b) (d)
20. Butadiene (spills)	(i)
21. Ethylene Flare Drum Liquid	(g)
22. Wastewater (Abnormal)	(c) (f)
23. Debutanizer/Depropanizer Solids	(d) (e)
24. Dewatering Press Solids	(c)

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ATTACHMENT I-1

CDR™, ETHOXYLATION, METHYL CHLORIDE, NORMAL PARAFFIN

<u>HAZARDOUS WASTE</u>	<u>HANDLING CODE</u>
1. Asbestos Insulation	(h)
2. Charcoal Filters (spent)	(d) (e)
3. Spent Limestone	(j)
4. $TiCl_3$ (spills)	(e)
5. CDR™ Sieves (spent)	(d) (e)
6. Molex Filters (spent)	(d) (e)
7. Used Dessicant	(d) (e)
8. Molex Sieves (spent)	(c) (d) (e)
9. Caustic (spills)	(b) (f)
10. Phosphoric Acid (spills)	(b) (f)
11. Sulphuric Acid (spills)	(b) (f)
12. N-Pentane (spills)	(a) (f)
13. Iso-Octane (spills)	(a) (f)
14. Methanol (spills)	(a) (f)
15. NPU API Separator Solids	(c) (l)
16. 1-Octene (spills)	(a) (f)
17. Methyl Chloride (spills)	(i)
18. 1-Decene (spills)	(a) (f)
19. Kerosene (spills)	(a) (f)
20. Ethylene Oxide (release)	(i)
21. Acetic Acid (spills)	(b) (f)
22. Aqua Ammonia (spills)	(b) (f)
23. Conoco 350 (spills)	(a) (f)
24. Wastewater (Abnormal)	(c) (f)

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ATTACHMENT I-1

ALCOHOL PLANT

<u>HAZARDOUS WASTE</u>	<u>HANDLING CODE</u>
1. Aluminum Powder (spills)	(k)
2. Slop Alcohols	(c) (f)
3. Cooling Tower Water	(g)
4. Alcohol Cooling Tower Sludge	(c) (l)
5. Barometric Cooling Tower Solids	(c) (l)
6. Asbestos Insulation	(h)
7. Sulfuric Acid (spills)	(b) (f)
8. Aqua Ammonia (spills)	(b) (f)
9. Iso-Pentane (spills)	(a) (f)
10. N-Hexane (spills)	(a) (f)
11. TPT (spills)	(k)
12. ATE (spills)	(k)
13. N-Pentane (spills)	(a) (f)
14. Alum (spills)	(b) (d)
15. Wastewater (Abnormal)	(c) (f)

WASTE HANDLING KEY

- (a) Contain spill and pick up free liquid. Place any contaminated soil in hazardous waste drum storage. Contact Ethylene Offsites operations supervisor for disposal of collected materials. File a spill report.
- (b) Contain spill. Neutralize free liquid (for example use soda ash to neutralize sulfuric acid) using appropriate operating procedure. Pick up contaminated materials, place in drum storage area. Contact Ethylene Offsites operations supervisor for disposal of collected material. File a spill report.
- (c) Remove by tank truck or other approved means to hazardous waste landfill. Manifest as required if shipped offsite.
- (d) Place directly in hazardous waste dumpster south of Methyl Chloride, after contacting Ethylene Offsites operations supervisor.
- (e) Place in drum storage until such time as material may be placed in hazardous waste dumpster, under normal drum waste disposal procedure.
- (f) Feed to wastewater system and inform Ethylene Offsites operations supervisor for proper recordkeeping of date and quantity placed in system.
- (g) Discharge to wastewater system.
- (h) Asbestos is typically removed from service by contractors. It is to be wetted during removal, placed in plastic bags and labeled as Asbestos. The material is to be manifested and disposed in a hazardous waste landfill. Personal protective equipment is to be used during handling as specified in Safety Department Procedures, and the Director of Environmental Control is to be notified of the quantity removed, to comply with EPA reporting.
- (i) No cleanup procedure, reference Pollution Control Manual for Guidelines for Reporting Air Pollution incidents.
- (j) Place in waste limestone rock weathering pile which is located northwest of the Alumina Unit silos.
- (k) Allow reaction to complete. Recover any resulting solids and place in hazardous waste drum storage area for later disposal.
- (l) Place in thickening tanks for processing through dewatering press. Contact Ethylene operations supervisor for information.

II. HAZARDOUS WASTE DRUM STORAGE PROGRAM

The particular hazardous wastes for each process/unit area are listed. Falling under the EPA system for identifying hazardous wastes, these outfalls, streams, and spilled materials must be handled in accordance with EPA requirements for identifying and tracking the wastes. The methods for handling for disposal named in Part I may be typical of current procedures, however, the following requirements must be added to the program so that the overall system may be in compliance.

1. Each unit or process area must establish a drum storage area for hazardous wastes that are generated on an occasional basis, in small quantities, or must be stored prior to disposal. This area must be designated within two weeks of distribution of this memo.
2. Once per week, the drummed wastes will be transferred to the BFI Dumpster (south of Methyl Chloride) for landfilling. The operations supervisor for Ethylene Offsites (currently G. L. Satterfield) will accept transfer of the wastes and keep record of the number of drums delivered from each unit, assuming the material is acceptable to this process. To guarantee the proper use of the dumpster, it will be padlocked upon distribution of this memo.
3. Each unit will be responsible for its wastes until accepted by the Ethylene Offsites operations supervisor. Each unit should have an individual who has responsibility for proper operation of the drum storage area.
4. Criteria for the drum storage area:
 - A. Siting
 - (1) Must be located in an area which drains to the wastewater treatment system.
 - (2) Must be in an area where possible storage of volatile materials would not present a fire or ignition hazard.
 - (3) Must provide adequate access space for handling of drums. The area should not be located such that unit operations are impaired.
 - (4) Boundaries of the area must be set and clearly marked.
 - (5) Upon designation of the area, and any time there are to be changes in boundaries or location, notify Jack Neeld or myself, for both recordkeeping, and review of the proposal.
 - B. Storage
 - (1) Containers should be kept on pallets for ease of handling.
 - (2) Containers must be closed except when filling or emptying.
 - (3) Containers must be clearly marked as containing hazardous waste, either by painting "Contains Hazardous Waste" on the drum, or by using a label stating such.

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- (4) The storage area must also be identified as a hazardous waste area, with signs visible from all approaches.
- (5) Containers for similar wastes should be reused, with all residues removed if the drum is to be used for a different type of waste.
- (6) Liquids and solids are not to be mixed in the same drum.
- (7) Leaking containers must be eliminated, with the contents placed in a non-leaking container. Containers with obvious deterioration should not be used or reused.
- (8) The quantity of material transferred to the BFI Dumpster (south of Methyl Chloride) is to be recorded by the Ethylene Offsites operations supervisor. This dumpster is designated as the disposal site for all hazardous wastes stored in drums. Hazardous wastes must not be placed in any of the other dumpsters, unless otherwise instructed.
- (9) Drums of hazardous wastes are not to be shipped offsite at any time.
- (10) Drums storing hazardous waste must be kept in the designated storage area unless in transit to be emptied at the hazardous waste dumpster. Unattended drums left in areas which are not designated storage areas would constitute improper hazardous waste management and so be considered noncompliance.

III. INSPECTIONS AND RECORDS

The RCRA regulations require inspection of all facilities in hazardous waste service, specifying intervals and what is to be looked for. The definition of a facility is all drums, tanks, pits, ponds, lagoons, or any other equipment in which hazardous waste is handled. The object of these inspections is to be certain all equipment is operated properly, all equipment will operate properly, there is no deterioration of the structure of the equipment, and there is no leakage or sign of leakage. The objective is to minimize the possibility of release of hazardous wastes due to equipment failure or operator error.

Attached is a listing of the requirements for inspection (see Attachment III-1) of all hazardous waste handling facility types at the LCCP. Attachment III-2 is a list of the facilities in each operating unit which is in hazardous waste service, and so must be inspected. Please develop a method for performing the inspections and implement the program no later than two weeks after this memo date. The inspection reports will become a part of the recordkeeping required, they must be retained for three years. Please return to me a copy of your inspection format and written notice of the location of your recordkeeping. Be certain that when a problem is noted on an inspection report, that a followup note stating remedial and final action to correct the problem, is included in your recordkeeping. These records are subject to EPA review. They must be complete.

Certain of these requirements may present unforeseen operating problems. If this is the case, please present the problem and alternatives to Jack Neeld or myself, so we may determine what our alternatives are from the regulatory standpoint. Now is the time to make whatever changes are needed. The example inspection format (Attachment III-3) is given as a guide for forming the particular unit inspection procedure. Feel free to use this format or to change it as you feel appropriate. Please return to me copies of your final format by January 2 so that I can include in the necessary recordkeeping. If you would like to discuss or like assistance in developing your inspection procedure, let me know. The format for Chemical, Physical, and Biological treatment will be developed when the dewatering press is installed.

CWH 000009247

Facility Inspection Requirements

A. Container Storage

Containers must be inspected weekly to determine that:

1. Containers holding hazardous wastes are closed.
2. Containers are not leaking or have not deteriorated to the point of being unsafe.

B. Tank - Treatment or Storage of Hazardous Wastes

Tanks will be inspected daily to determine:

1. The discharge control equipment is in good working order (eg. feed cutoff systems, bypass systems, drainage systems).
2. The data from monitoring equipment shows the tank is being operated according to design.
3. For undiked, uncovered tanks, the level in the tank is to be checked to ensure there is at least two feet of freeboard.

Tanks will be inspected at least once weekly to determine:

1. The tank materials have not significantly corroded and there are no visible leaks.
2. The construction materials of containment structures have not deteriorated or leaked and the area immediately surrounding the structures show no signs of leaks (eg. wet spots).

C. Surface Impoundments

1. Daily inspection to ensure there is at least two feet of free board.
2. Weekly inspection to determine that materials of construction have not leaked, deteriorated or failed.

D. Chemical, Physical, or Biological Treatment

Daily inspections to ensure:

1. Discharge control and safety equipment (eg. bypass, drainage, or pressure relief system) are in proper working order.
2. Monitoring data indicates proper process operation.

Weekly inspection of:

1. Equipment of the treatment process to detect significant corrosion or leaks.
2. Containment structures to detect physical deterioration or leaks.

STEAM PLANT, ETHYLENE AND OFFSITES HAZARDOUS WASTE FACILITIES

Containers

1. Hazardous waste drum storage area
2. Miscellaneous solids dumpster

Tanks

1. T6-227 Black Tank
2. FB-926 Sludge Storage Tank
3. FB-927 Sludge Storage Tank
4. White Crinkle Tank
5. East Tank
6. West Tank
7. Recovered Solvent Tank
8. Ethylene Spent Caustic Tank
9. Sludge Tank (to be installed)

Surface Impoundments

1. Holding Pond Inlet Boxes
2. Ethylene-Alcohol API Separator
3. Holding Pond
4. North Lagoon
5. South Lagoon
6. Storm Water Diversion Pond
7. Sandfilter (North and South)

Chemical, Physical or Biological Treatment

1. Dewatering Press

ATTACHMENT III-2

ALCOHOL HAZARDOUS WASTE FACILITIES

Containers

1. Hazardous waste drum storage area

Tanks

1. Barometric Cooling Tower

CWH 000009250

ATTACHMENT III-2

METHYL CHLORIDE, NORMAL PARAFFIN, CDRTM, ETHOXYLATION HAZARDOUS WASTE FACILITIES

Containers

1. Unit Hazardous Waste Drum Storage Facility

Surface Impoundments

1. NPU API Separator
2. Acid Neutralization Pit
3. E.O. Blowdown Pit

Other

1. Rock Weathering Facility

EXAMPLE INSPECTION FORMATDrum Storage Area -

1. Are all drums covered? Yes _____ No _____
 2. Are any drums leaking? Yes _____ No _____
 3. Do any drums show evidence of severe corrosion? Yes _____ No _____
- (If yes, describe action to be taken)

Tanks -Daily

1. Is all discharge control equipment in working order? List equipment checked, list corrective actions to be taken.
2. From daily operating data (if applicable)
 - Is proper pressure maintained?
 - Is proper level maintained?
 - Is proper temperature maintained?

(If not, list corrective actions taken or notifications given)
3. For open, undiked tanks, is two feet of free board maintained?

Weekly

1. Does tank show corrosion, leaking seams, or leaking fixtures?

(If yes, list corrective actions taken or notifications given)
2. Does containment structure (dike, etc) show signs of erosion or deterioration? Is there evidence of leaks of material, wet spots caused by material, or other evidence such as dead vegetation?

(If so, list actions taken or notifications given)

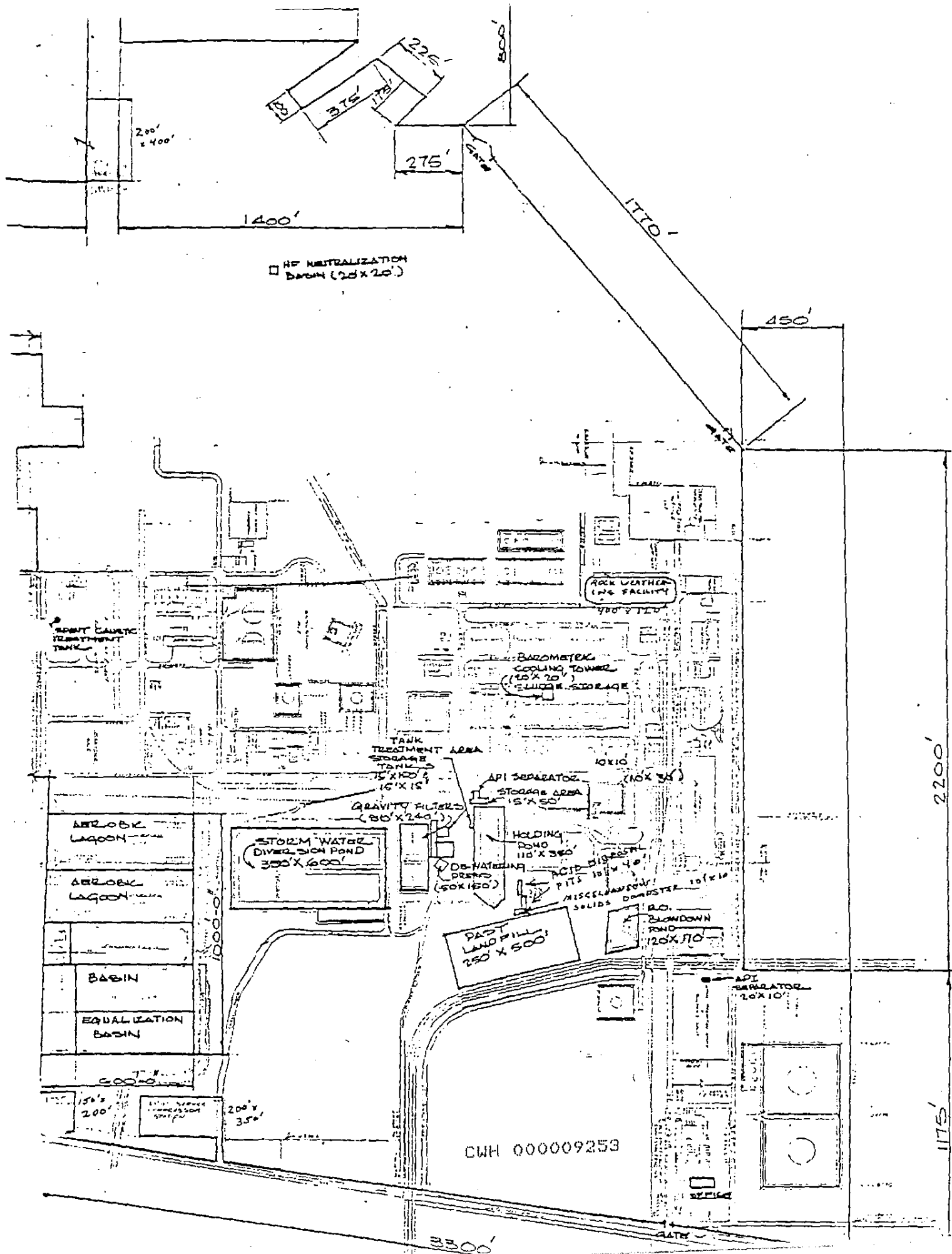
Surface Impoundments -Daily

1. Is two feet of free board maintained?

Weekly

1. Do materials of construction show signs of leakage or deterioration?

(If so, list actions taken or notifications given)



1. MANIFEST NUMBER

STATE OF LOUISIANA
DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE MANAGEMENT

For Dept. Use:

Index.# _____

Date _____

EXAMPLE #16

2. WASTE INFORMATION:					PACKAGING	
HMF	SHIPPING DESCRIPTION	HAZARD CLASS	WASTE NUMBER	WEIGHT (TONS)	QTY	TYPE
X	Hazardous Waste, solid "N.O.S."	Flammable Solid	La. No. 514-02			
	(solids-Alfines/Alcohol Sludge)					

3. GENERATOR EPA I.D. NUMBER _____ GD-514 Telephone: 491-5437
GENERATOR INFORMATION: Identification Number: _____
NAME OF COMPANY: Conoco Chemicals
ADDRESS: P. O. Box 727, Westlake, LA. ZIP: 70669
SHIPPING LOCATION: Lake Charles Chemical Plant - Old Spanish Trail
CERTIFICATION: This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation, and the Louisiana Department of Natural Resources, and the EPA.

Generator Signature _____

Date _____

4. TRANSPORTER EPA I.D. NUMBER _____
TRANSPORTATION INFORMATION: Identification Number: _____ Telephone: _____
NAME OF COMPANY: _____ DATE OF PICK UP: _____ TIME: _____
DATE OF DELIVERY: _____ TIME: _____
CERTIFICATION: This is to certify that the above-named materials were picked up at the date and time above, that the above named materials were delivered without incident to the disposer at the date and time above, and that to the best of the transporter's knowledge, his portion of the manifest is accurately and correctly filled out.

Transporter Signature _____

Date _____

5. DISPOSER EPA I.D. NUMBER _____
DISPOSER INFORMATION: Identification Number: _____ Telephone: _____
NAME OF COMPANY: _____
LOCATION WHERE SHIPMENT RECEIVED: _____
CERTIFICATION: This is to certify acceptance of the hazardous waste, that the waste has been or will be disposed of in accordance with Department of Natural Resources relations, and that to the best of the disposer's knowledge, his portion is accurately and correctly filled out.

Disposer Signature _____

Date _____

6. EMERGENCY INFORMATION:
Immediate Response Information: Contain spills, clean up as necessary.
Telephone: (318) 491-5450
Special Handling Instructions: Wash skin contact area. Contaminated clothing must be washed prior to reuse.
Comments: Report an emergency situation to the above 24 hour number immediately.

CWH 000009254

* If for any reason the disposer does not accept shipment, the transporter must return the shipment to the point of origin.

1. MANIFEST NUMBER

STATE OF LOUISIANA
DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE MANAGEMENT

For Dept. Use

Index # _____

Date _____

Example #12

2. WASTE INFORMATION:					PACKAGING	
HM	SHIPPING DESCRIPTION	HAZARD CLASS	WASTE NUMBER	WEIGHT (TONS)	QTY	TYPE
X	Hazardous Waste, solid "N.O.S."	Flammable Solid	La. No. 514-33			
	(T-2 Pit Sludge)					

Generator EPA ID No. LAD086478047
 3. GENERATOR INFORMATION: Identification Number: GD-514 Telephone: 491-5437
 NAME OF COMPANY: Conoco Chemicals
 ADDRESS: P.O. Box 605, Westlake, La ZIP: 70669
 SHIPPING LOCATION: VCM Plant - VCM Road
 CERTIFICATION: This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation, and the Louisiana Department of Natural Resources.

 Generator Signature Date

Transporter EPA ID No.
 4. TRANSPORTATION INFORMATION: Identification Number: _____ Telephone: _____
 NAME OF COMPANY: _____ DATE OF PICK UP: _____ TIME: _____
 DATE OF DELIVERY: _____ TIME: _____
 CERTIFICATION: This is to certify that the above-named materials were picked up at the date and time above, that the above named materials were delivered without incident to the disposer at the date and time above, and that to the best of the transporter's knowledge, his portion of the manifest is accurately and correctly filled out.

 Transporter Signature Date

Disposer EPA ID No.
 5. DISPOSER INFORMATION: Identification Number: _____ Telephone: _____
 NAME OF COMPANY: _____
 LOCATION WHERE SHIPMENT RECEIVED: _____
 CERTIFICATION: This is to certify acceptance of the hazardous waste, that the waste has been or will be disposed of in accordance with Department of Natural Resources relations; and that to the best of the disposer's knowledge, his portion is accurately and correctly filled out.

 Disposer Signature Date

6. EMERGENCY INFORMATION:
 Immediate Response Information: _____ Telephone: _____
 Special Handling Instructions: _____
 Comments: _____

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Note: If for any reason the disposer does not accept shipment, the transporter must return the shipment to the point of origin

1. MANIFEST NUMBER

STATE OF LOUISIANA
DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE MANAGEMENT

For Dept. Use

Index # _____

Date _____

Example # 13

2. WASTE INFORMATION:

HM	SHIPPING DESCRIPTION	HAZARD CLASS	WASTE NUMBER	WEIGHT (TONS)	QTY	PACKAGING TYPE
X	Hazardous Waste, Solid, "N.O.S."	O.R.M.E.	514-31			
	(EDX cake Residue)					

3. Generator EPA ID No. LAD 086478047
GENERATOR INFORMATION: Identification Number: 62-514 Telephone: 491-5437

NAME OF COMPANY: Conoco Chemicals

ADDRESS: P.O. Box 605, Westlake, La ZIP: 70669

SHIPPING LOCATION: VCM Plant - VCM Road

CERTIFICATION: This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation, and the Louisiana Department of Natural Resources.

Generator Signature _____

Date _____

4. TRANSPORTER EPA ID No. _____
TRANSPORTATION INFORMATION: Identification Number: _____ Telephone: _____

NAME OF COMPANY: _____ DATE OF PICK UP: _____ TIME: _____

DATE OF DELIVERY: _____ TIME: _____

CERTIFICATION: This is to certify that the above-named materials were picked up at the date and time above, that the above named materials were delivered without incident to the disposer at the date and time above, and that to the best of the transporter's knowledge, his portion of the manifest is accurately and correctly filled out.

Transporter Signature _____

Date _____

5. DISPOSER EPA ID No. _____
DISPOSER INFORMATION: Identification Number: _____ Telephone: _____

NAME OF COMPANY: _____

LOCATION WHERE SHIPMENT RECEIVED: _____

CERTIFICATION: This is to certify acceptance of the hazardous waste, that the waste has been or will be disposed of in accordance with Department of Natural Resources relations, and that to the best of the disposer's knowledge, his portion is accurately and correctly filled out.

Disposer Signature _____

Date _____

6. EMERGENCY INFORMATION:

Immediate Response Information: _____ Telephone: _____

Special Handling Instructions: _____

Comments: _____

CWH 000009256

NOTE: If for any reason the disposer does not accept shipment,
the transporter must return the shipment to the point of origin