



DEPARTMENT OF THE ARMY  
HEADQUARTERS, U.S. ARMY GARRISON FORT MONMOUTH  
FORT MONMOUTH, NEW JERSEY 07703-5000

PLEASE RESPOND TO

Directorate of Public Works  
IMNE-MON-PWE

September 30, 2005

U.S. Environmental Protection Agency, Region 2  
ATTN: Alan J. Steinberg, Administrator  
290 Broadway  
New York, NY 10007-1866

**RE: Unmanifested Waste Report**

Dear Mr. Steinberg:

This correspondence is sent to supplement the Amended Unmanifested Waste Report submitted to USEPA Region 5 (attached) by Onyx Environmental Services, Inc. (OES) dated August 23, 2005. A description of the occurrence and subsequent action follows below.

On June 27, 2005, a 5-gallon drum containing expired laboratory standards and solvent reagent vials was shipped from Fort Monmouth to OES, Flanders, NJ. It was then transported to OES-Trade Waste Incineration (TWI), Sauget, IL, arriving there on July 13. Upon inspection of the contents at TWI, one vial containing an expired PCB standard (~200 ppm) used to calibrate analytical equipment was discovered among the 500+ vials. The volume of PCB containing material is less than 2 ml. TWI is not authorized to accept PCB waste nor did the manifest list PCB waste as one of the items shipped. The Fort Monmouth Environmental Branch was notified of this on July 14. OES initiated internal measures to reroute the container to an authorized facility (OES, Port Arthur TX) and reported that intent in an initial notification to USEPA Region 5 on August 1. However, prior to the shipment Fort Monmouth staff concluded it would be prudent to inspect the contents of the container in order to conduct a thorough quality control assessment. The container was returned to Fort Monmouth from TWI on September 8 (see attached manifest NJA5012191-B). It was received at Fort Monmouth on September 16, 2005.

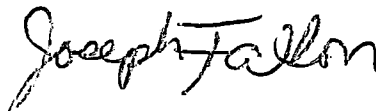
Upon inspection of the contents, it was confirmed that only one PCB-containing vial was present. Our review of laboratory and purchasing records and employee interviews determined that the vial was inadvertently placed in a container used to collect non-PCB containing laboratory standards. The cause is attributed to human error by laboratory personnel.

In order to ensure that this error does not occur again, one-on-one retraining of lab personnel has been presented by the Laboratory Manager in cooperation with DPW Environmental Branch staff. The training session reinforced established inventory accounting and waste handling procedures.

After removal of the PCB vial, the 5-gallon drum was relabeled, manifested and shipped on September 19 (see attached manifest NJA5306918). The PCB vial was retained in order to complete our assessment of the incident. It is now stored in the PCB storage locker at the Main Post 90-day storage facility. It will be shipped as part of the next 90-day disposal action.

Fort Monmouth has an excellent environmental compliance record achieved through diligence, training and continuous improvement. This event provided an opportunity for management to improve practices that will better assure compliance in the future. I trust this explanation provides sufficient detail. If more information is needed please contact Kevin Gashlin of my staff at the letterhead address or at 732-532-7068.

Sincerely,

A handwritten signature in cursive script that reads "Joseph Fallon".

Joseph Fallon  
Environmental Team Leader

Cc: Kathleen Malone, Federal Facilities Coordinator, USEPA Region 2  
Ferdinand Scaccetti, Supervisor, Manifest Unit, NJDEP  
Daniel Wright, Laboratory Manager, TECOM-Vinnell Services  
Kevin Gashlin, Environmental Specialist, DPW

### Amended Unmanifested Waste Report

This form provides the information required in 40 CFR 761.211(c) for reporting unmanifested TSCA waste.

Report Date: August 1, 2005; Amended August 23, 2005

Unmanifested TSCA Regulated PCB Waste Report No. 0506 Amended

- 1) EPA Identification number, name and address of receiving facility:

ILD098642424  
ONYX-Trade Waste Incineration  
7 Mobile Avenue  
Sauget, IL 62201

- 2) Date the facility received the unmanifested TSCA regulated PCB waste: 7/13/05

Receiver number: 27-5887    Container number: Drum number: PP0480613000-25-1

- 3) EPA identification number, name and address of the generator and transporter:

Generator ID: NJ3210020597  
Name: U.S. Army Com. Elec.  
Main Post – J. Fallon  
Attn: IMNE-MON-PWE  
Fort Monmouth, NJ 07703

Transporter ID#: NJD000692061  
Name: Environmental Transport Group

- 4) Description of the type and quantity of the unmanifested PCB waste as received at Onyx:  
Shipping Description: Waste Dichloromethane, 6.1, UN1593, III.

Original Manifest:	NJA5012191	Page: 2	Line: b
Illinois Manifest:	IL10684807	Page: 4	Line: b

Type of container: Poly    Number of containers: 1    Size: 5 gal.

- 5) Brief Explanation of why the waste was unmanifested: The generator was unaware that PCBs were included in their load.

- 6) The disposition of the unmanifested waste by the facility, was waste rejected and manifest supplied? ~~The waste will be sent to Onyx Environmental Services' TSCA permitted incineration facility located in Port Arthur, Texas. Onyx will prepare the reject manifest.~~ The generator changed the reject location subsequent to the initial report being filed on August 1, 2005. The waste was instead shipped to the Onyx Flanders, New Jersey facility on August 17<sup>th</sup>. From Flanders, the waste will be returned to the original generator. Onyx – Trade Waste Incineration prepared the manifest rejecting the waste to the Onyx Flanders facility.

Distribution: PCB Log  
USEPA Region V  
U.S. Army  
Mary Gaskill, ONYX, Flanders



State of New Jersey  
Department of Environmental Protection  
Hazardous Waste Regulation Program  
Manifest Section



5012191

P.O. Box 414, Trenton, NJ 08625-0414

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved.

OMB No. 2050-0039.

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. NJ 3210020597		Manifest Document No. 12191		2. Page 1 of 3		Information in the shaded areas is not required by Federal law.		
3. Generator's Name and Mailing Address US ARMY COM ELEC COMD MAIN POST-J. FALLON ATTN:IMNE-MON-PWE FORT MONMOUTH, NJ 07703						A. State Manifest Document Number <b>NJA 5012191-B</b>				
4. Generator's Phone ( 732 ) 532-1122						B. State Generator's ID-(Gen. Site Address) SAME				
5. Transporter 1 Company Name ONYX ENVIRONMENTAL SVCS L.L.C.				6. US EPA ID Number NJ D 0180631389		C. State Trans. ID-NJDEP 5 D 1 6 0 Decal No. 8 4 0 0 2				
7. Transporter 2 Company Name <i>Environmental Transport Group Inc</i>				8. US EPA ID Number <i>ND 000692061</i>		D. Transporter's Phone ( 973 ) 347-7111				
9. Designated Facility Name and Site Address ONYX ENVIRONMENTAL SERVICES L.L.C. 1 EDEN LANE FLANDERS, NJ 07836						E. State Trans. ID-NJDEP 7107 Decal No. 80631				
10. US EPA ID Number NJ D 980536593						F. Transporter's Phone (973) 347-8200				
11. US DOT Description (Including Proper Shipping Name, Hazard Class or Division, ID Number and Packing Group) HM						12. Containers		13. Total Quantity	14. Unit Wt/Vol	1. Waste No.
a. <del>WASTE PBT MIXED BODIES, H.O.S., C, UN1000, H</del>						<del>1</del>		<del>1</del>	<del>1</del>	<del>1</del>
b. <del>WASTE POTASSIUM PERCHLORATE, SOLUTION, O.T., UN1065, H</del>						<del>1</del>		<del>1</del>	<del>1</del>	<del>1</del>
c. <del>WASTE CRYSTALLINE SOLS, H.O.S., S.A., UN173, H</del>						<del>1</del>		<del>1</del>	<del>1</del>	<del>1</del>
d. <del>WASTE POTASSIUM PERCHLORATE, SOLUTION, O.T., UN1065, H</del>						<del>1</del>		<del>1</del>	<del>1</del>	<del>1</del>
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above				
a. <del>WASTE</del>						a. <del>So1</del>				
b. <del>WASTE</del>						b. <del>So1</del>				
c. <del>WASTE</del>						c. <del>So1</del>				
d. <del>WASTE</del>						d. <del>So1</del>				
15. Special Handling Instructions and Additional Information PACKING SLIPS ATTACHED FOR CLARIFICATION - EMERGENCY NUMBER-INFOTRAC: 1-800-535-5053										
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 government regulations. If I am a large quantity generator, I 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 that 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 Joseph M. Fallon				Signature Joseph M. Fallon				Month Day Year 06 27 05		
17. Transporter 1 Acknowledgement of Receipt of Materials										
Printed/Typed Name Thomas R. Smolka				Signature Thomas R. Smolka				Month Day Year 06 27 05		
18. Transporter 2 Acknowledgement of Receipt of Materials										
Printed/Typed Name Frank Pinto				Signature Frank Pinto				Month Day Year 06 30 05		
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 Anthony Callaremi Jr				Signature Anthony Callaremi Jr				Month Day Year 06 30 05		

EPA Form 1700-22

SIGNATURE AND INFORMATION MUST BE LEGIBLY ON ALL COPIES

1. TO BE MAILED TO THE STATE

In case of an emergency call the State Air Quality Emergency Response Team at 1-800-535-5053

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

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)	21. Generator's US EPA ID No. NJ3210020597	Manifest Document No. 12191	22 Page 2 of 3	Information in the shaded areas is not required by Federal law.
	23. Generator's Name US ARMY COM ELEC COMD MAIN POST-J. FALLON ATTN:IMNE-MON-PWE FORT MONMOUTH, NJ 07703 (732)532-1122			L. State Manifest Document Number NJ A5012191 - 5

24. Transporter 3 Company Name Environ. Transport Group Inc NJ D0000692061	25 US EPA ID Number NJ D0000692061	N. State Trans ID NJ DEP 7107-08685	O. Trans. Phone (973) 347-8200
26. Transporter 4 Company Name Oryx Environmental Services LLC NJ D080631369	27 US EPA ID Number NJ D080631369	P. State Trans ID NJ DEP 7107-08685	Q. Trans. Phone 973 347-8200

HM	28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	29 Containers		30 Total Quantity	31 Unit Wt/Vol	R Waste No.
		No	Type			
a. X	WASTE PHENOL, SOLID, 6.1, UN1505, III					
b. X	WASTE DICHLOROMETHANE, 6.1, UN1593, III	0 0 1	D F	0 0 0 2 9	P	F002
c. X	TOXIC SOLID, INORGANIC, 6.1, UN2888, III					NONE
d. Y	CORROSIVE SOLID, ACIDIC, INORGANIC, 6.1, UN2894, II					
e. Y	WASTE CORROSIVE LIQUID, ACIDIC, INORGANIC, 6.1, UN2804, II (HYDROCHLORIC ACID, SULFURIC ACID)					
f. X	WASTE SODIUM SULFIDE, HYDRATED WITH WATER, 6.1, UN2890, II					
g. Y	WASTE CORROSIVE LIQUID, TOXIC, 6.1, UN2892, II (SULFURIC ACID, HYDROGEN SULFIDE, HYDROGEN CYANIDE)					
h. Y	WASTE CORROSIVE LIQUID, TOXIC, 6.1, UN2893, II (HYDROCHLORIC ACID, METHYLENE CHLORIDE)					
i. X	WASTE CORROSIVE LIQUID, BASIC, INORGANIC, 6.1, UN2891, II (SODIUM HYDROXIDE, POTASSIUM HYDROXIDE)					

Joseph M. Fallon 6/27/05

GENERATOR

TRANSPORTER FACILITY

S. Additional Descriptions for Materials Listed Above A) 55 GALS (208 L) METHYLENE CHLORIDE B) 10 GALS (38 L) METHYLENE CHLORIDE C) 10 GALS (38 L) METHYLENE CHLORIDE D) 10 GALS (38 L) METHYLENE CHLORIDE E) 10 GALS (38 L) METHYLENE CHLORIDE F) 10 GALS (38 L) METHYLENE CHLORIDE G) 10 GALS (38 L) METHYLENE CHLORIDE H) 10 GALS (38 L) METHYLENE CHLORIDE I) 10 GALS (38 L) METHYLENE CHLORIDE J) 10 GALS (38 L) METHYLENE CHLORIDE K) 10 GALS (38 L) METHYLENE CHLORIDE L) 10 GALS (38 L) METHYLENE CHLORIDE M) 10 GALS (38 L) METHYLENE CHLORIDE N) 10 GALS (38 L) METHYLENE CHLORIDE O) 10 GALS (38 L) METHYLENE CHLORIDE P) 10 GALS (38 L) METHYLENE CHLORIDE Q) 10 GALS (38 L) METHYLENE CHLORIDE R) 10 GALS (38 L) METHYLENE CHLORIDE S) 10 GALS (38 L) METHYLENE CHLORIDE T) 10 GALS (38 L) METHYLENE CHLORIDE U) 10 GALS (38 L) METHYLENE CHLORIDE V) 10 GALS (38 L) METHYLENE CHLORIDE W) 10 GALS (38 L) METHYLENE CHLORIDE X) 10 GALS (38 L) METHYLENE CHLORIDE Y) 10 GALS (38 L) METHYLENE CHLORIDE Z) 10 GALS (38 L) METHYLENE CHLORIDE	T. Handling Codes for Wastes Listed Above F002
--	---

32. Special Handling Instructions and Additional Information  
PACKING SLIPS ATTACHED FOR CLARIFICATION - EMERGENCY NUMBER-INFO TRAC: 1-800-535-5053

Rec'd Oryx 3100 Kelly St. Phx PA 19137 on 9/8/05

33. Transporter 3 Acknowledgement of Receipt of Materials Printed/Typed Name: Frank Pinto Signature: Frank Pinto Date: 09/18/05
--

34. Transporter 4 Acknowledgement of Receipt of Materials Printed/Typed Name: Thomas R Swalko Signature: Thomas R Swalko Date: 09/16/05
--

35. Discrepancy Indication Space Line 2B (1 DFC @ 29 lbs) is Being Returned To The Generator, Per Their Request as: Waste Toxic Liquids, Organic, n.o.s. (methylene Chloride) (Polychlorinated Biphenyls) 6.1, UN2810, III (m. Blaskill, Oryx, Inc, 9/8/05)  
Generator Signature: Kevin F. Goshkin Date Rec'd: 9-16-05

MGASKILL  
AGANPFR

ONYX Environmental Services  
Outgoing Packing Sum by Disposal

Page 1  
8/12/05 12:15:48

~~Generator: Outgoing Manifest#: IL10684880~~

EPA ID: ILD098642424

ONYX ENVIRONMENTAL SVCS, L.L.C.  
7 MOBILE AVENUE  
SAUGET, IL 62201

Incoming Generator:

US ARMY COM ELEC COMD  
FORT MONMOUTH, NJ 07703  
NJ3210020597

PG: 1 LN: A

Cont#: PP 0480613000 025 01 0

In. Manif: NJA5012191 Shp: 6/27/05

WIP: 596489 Disp Code: REJ001

P/S: L UOM: P Waste#: T F002

Shipping Name: WASTE TOXIC LIQUIDS, ORGANIC, n.o.s. (METHYLENE  
CHLORIDE) (POLYCHLORINATED BIPHENYLS), 6.1,  
UN2810, III

Container Type: 051H1DF Container Weight: 29 Cubic Feet: .68

Units	Container	Net	Chemical Name
1	5 GAL	29.00	WASTE STREAM NOT FOUND

Waste Number: F002 PCB2  
Description.: METHYLENE CHLORIDE (IN GLASS AND PLASTIC VIALS) 0-100%  
AND VIALS CONTAINING POLYCHLORINATED BIPHENYLS  
\*\*ORIGINAL APPROVAL CODE WAS: TWIPELOP6\*\*

In case of an emergency or spill immediately call the state the emergency occurred in and the N.J. Dept. of Environmental Protection and Energy. (609) 292-7172

002069703700

NJA 5306918

2. Generator Name  
ATMOSPHERIC FALLON  
ATMOSPHERIC FALLON  
FORT MONMOUTH NJ 07703

4. Generator Phone (973) 382-1452

5. Transporter Name  
ENVIRONMENTAL SERVICES  
L.L.C.

7. Transporter Phone

9. Generator Facility Name and Site Address  
ENVIRONMENTAL SERVICES  
L.L.C.

10. Generator Facility Address  
ROSELAND  
FLANDERS NJ 07838

11. US DOT Description of Tank, Proper Shipping Name, Hazard Class or Division

12. Quantity

a.  WASTE FLAMMABLE LIQUIDS, TOXIC, n.o.s.,  
(ACETONE, METHYLENE CHLORIDE, 3 (4.1), UN 1992,

0.01 DE 0.0040 P

b.  WASTE FLAMMABLE LIQUIDS, ORGANIC, n.o.s.,  
(METHYLENE CHLORIDE, UN 1992)

0.02 DE 0.0100 P

c.  WASTE CORROSIVE LIQUID, ACID, INORGANIC,  
n.o.s., (HYDROCHLORIC ACID, SULFURIC ACID), 8,  
UN 1825

0.03 DE 0.0100 P

d.  WASTE CORROSIVE LIQUID, ACID, INORGANIC,  
n.o.s., (HYDROCHLORIC ACID, SULFURIC ACID), 8,  
UN 1825

0.01 DE 0.0025 P

13. EPA ID No. (if any)

14. State of origin of waste

15. State of destination of waste

16. Generator Certification: I hereby declare that the information furnished hereon is true and accurate, and that I am a responsible person in charge of the operations of the facility and have the authority to sign this statement.

If I am a large quantity generator, I hereby declare that I have a program in place to reduce the volume and toxicity of waste generated, and that I have selected the most appropriate method of treatment, storage, or disposal of such waste in accordance with the present and future applicable laws and the environment. If I am a small quantity generator, I hereby declare that I have a program in place to reduce the volume and toxicity of waste generated, and that I have selected the most appropriate method of treatment, storage, or disposal of such waste in accordance with the present and future applicable laws and the environment.

Signature \_\_\_\_\_ Date \_\_\_\_\_

17. Transporter Name and Address  
Signature \_\_\_\_\_ Date \_\_\_\_\_

18. Transporter Name and Address  
Signature \_\_\_\_\_ Date \_\_\_\_\_

19. Transporter Name and Address  
Signature \_\_\_\_\_ Date \_\_\_\_\_

20. Transporter Name and Address  
Signature \_\_\_\_\_ Date \_\_\_\_\_