



Environment

Prepared for:
National Grid
Brooklyn, NY

Prepared by:
AECOM
Manhattan, NY
60137362
August, 2015

Annual Report Interim Remedial Measure for NAPL Recovery

**Former Equity Works MGP Site
Brooklyn, New York
NYSDEC Site No.: 224050
Order on Consent Index #: A2-0552-0606**



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Prepared by Mark McCabe, Program Manager

Reviewed by Peter S. Cox, Project Manager

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List of Acronyms

°F	Degrees Fahrenheit
BUG	Brooklyn Union Gas Company
DNAPL	Dense Non-aqueous Phase Liquid
ft	Feet
gpd	Gallons per day
gpm	Gallons per minute
IRM	Interim Remedial Measure
MGP	Manufactured Gas Plant
NAPL	Non-aqueous Phase Liquid
NYSDEC	New York State Department of Environmental Conservation
NYSDOH	New York State Department of Health
O.D.	Outside Diameter
PDI	Pre-Design Investigation
PVC	Polyvinyl chloride
TOC	Top of Casing

Executive Summary

National Grid's consultant, AECOM, has prepared this Interim Remedial Measure (IRM) Annual Report to document the operation of the non-aqueous phase liquid (NAPL) recovery system within the footprint of the former Equity Manufactured Gas Plant (MGP) site (the Site) located at 254 Maspeth Avenue in Brooklyn, New York during the period of July 2014 to May 2015. The IRM is being conducted pursuant to a Multi-site Order on Consent and Administrative Settlement, Index # A2-0552-0606, between The Brooklyn Union Gas Company (BUG), now d/b/a National Grid NY, and the New York State Department of Environmental Conservation (NYSDEC). Details regarding the construction of the NAPL IRM remedy are included in the IRM for NAPL Recovery Completion Report, submitted to the NYSDEC in May 2015 (AECOM, 2015).

The Site is located in a historically industrialized area and operated as a MGP from approximately 1893 to 1929. BUG transferred ownership of the Site in 1951. The Site currently consists of three adjoining properties – 222 Maspeth Avenue, 252 Maspeth Avenue, and 254 Maspeth Avenue. The 222 Maspeth Avenue property is used by Cooper Tank as a solid waste recycling facility, with the 252 and 254 parcels used to support Cooper Tank's recycling operations.

The IRM activities included the following:

- installation of 5 recovery wells at appropriate locations within the central areas of the Site to reduce the quantity of NAPL, and at 18 selected perimeter locations to control the potential for off-site migration.
- on-going measurement and recovery of NAPL that collects in the recovery wells.

Data collected to date indicated that NAPL collection rates at 12 of the 23 recovery well locations (2 on-site and 10 perimeter) warrant the operation of pumps to support automated recovery. The well pumps are controlled with timers that are adjusted, as required, to contain the NAPL within the sump of each well, but at a level above the inlet to the pump to minimize the collection of groundwater. The remaining 11 wells are managed using manual recovery techniques on a quarterly basis.

The system has operated with an on-line factor of greater than 95% and there have not been any incidents or unplanned releases from the system. Approximately 2,270 gallons of mixed fluids have been collected from the system from July 14, 2014 to June 1, 2015 and managed as an alternative fuel at the Tradebe Facility in Cohoes, N.Y. Observations of the collected material indicate an approximate 80:20 ratio of NAPL to water, providing for an average NAPL collection rate of approximately 6 gallons per day.

The focus of operations during the initial monitoring period was to regulate the pumping rates to control NAPL levels within the well sumps at each location. Near term operations will focus on the performance of frequent gauging events to confirm NAPL levels and make minor adjustments in pumping rates to ensure NAPL levels are within sump intervals. Proposed system upgrades will include: the continued replacement of pumps with a more reliable design from a different manufacturer; installation of additional insulation of the system to improve operation during winter months; addition of instrumentation to identify electrical issues with individual locations in a timely manner and restoration/replacement of a well vault at an on-site location that has been damaged by Cooper Tank operations.

1.0 Introduction

National Grid's consultant, AECOM, is submitting this Annual Report outlining the Interim Remedial Measure (IRM) for NAPL Recovery progress during the first year of operation. The NAPL recovery system is located within the footprint of the former Equity Works Manufactured Gas Plant (MGP) site (the Site). The Site consists of three adjoining properties – 222 Maspeth Avenue, 252 Maspeth Avenue, and 254 Maspeth Avenue located in Brooklyn, New York. The location of the Site and the orientation of the individual properties are illustrated in Figures 1-1 and 1-2, respectively.

The IRM is being implemented pursuant to a Multi-site Order on Consent and Administrative Settlement, Index # A2-0552-0606, between The Brooklyn Union Gas Company (BUG), now d/b/a National Grid NY, and the New York State Department of Environmental Conservation (NYSDEC), in accordance with applicable guidelines of the NYSDEC and the New York State Department of Health (NYSDOH).

This document is organized in the following manner: a summary of activities associated with the installation and operation of the recovery wells is presented in Section 2; the results from the monitoring activities are documented in Section 3 and proposed revisions to the system's operation are discussed in Section 4.

2.0 Recovery Well Installation and Operation

National Grid conducted the IRM to collect recoverable NAPL while site-wide investigation and remedial alternative and design activities are completed. The design of the NAPL recovery system included the installation of 23 recovery wells at locations that were determined to have the potential to collect mobile NAPL and be compatible with Cooper Tank's construction and long-term operational activities. Consistent with the NYSDEC approved work-plan (AECOM, 2013), recovery wells were installed in the following areas of the Site:

- **On-Site**—5 recovery wells (RW-1 through 5) were installed at locations within the 252 Maspeth Avenue property.
- **Site Perimeter**—18 recovery wells (RW-16 through 23) were installed along the perimeter of the Site on the 222, 252 and 254 Maspeth Avenue properties.

An illustration of well locations is provided on Figure 2-1. The perimeter locations are spaced at approximately 18 ft on center, with the exception of the area along the driveway of 254 Maspeth Avenue where the presence of a subsurface structure has required spacing of approximately 30 feet between the three proposed recovery wells (RW-6, -7 and -8). All locations were equipped with the infrastructure, i.e., conduits for electrical service and tubing, for the subsequent automation of NAPL recovery activities, if needed.

2.1 Recovery Well Designs

Recovery wells were designed to accommodate the uncertainty of long-term NAPL recovery rates. All well risers were constructed of 6-inch diameter schedule 40 polyvinyl chloride (PVC). Recovery well screens were constructed of 6-inch diameter 0.020-inch slot wire wrap stainless steel. Five (5) and ten (10 foot lengths of screen were used, as required, to address soil intervals where NAPL (i.e., saturated thickness greater than 1-inch) have been observed. Centralizers were installed at the top and bottom of each screen. The screen size was selected based on the grain-size information obtained during the Pre-Design Investigation (PDI). Each well was equipped with a 5-foot long, 6-inch diameter, stainless steel sump to collect NAPL. The annular space above the filter pack was filled with a bentonite seal (minimum of 3 to 4 feet thick). Note that additional bentonite seals were used at locations where multiple screen intervals were installed. The annular space above the bentonite seal was filled with a grout mixture from the bentonite seal to approximately one to two feet below the top of casing (TOC). Each recovery well was completed in a 4-foot by 4-foot traffic rated well vault. Illustrations of an in-place recovery well and completed well location are provided in Figure 2-2.

2.2 Initial Monitoring and NAPL Recovery

The NAPL recovery system is intended to operate in a manner that contains the NAPL levels at the locations within the well sumps (5 ft. in length). As part of the installation of the system, initial monitoring activities were conducted during 11 events during the period from May 2013 to February 2014 to provide a preliminary estimate of potential collection rates. The results were used to determine which locations would require automation for the cost-effective recovery of NAPL. The monitoring activities provided the ability to group the locations into three categories based on the observed recharge rates. They were grouped as follows: Primary Recovery Wells (produce

approximately 1 gallon per day (gpd) of NAPL recovered; Secondary Recovery Wells (approximately 0.1 to 0.5 gpd of NAPL recovered) and Gauging Wells (< 0.1 gpd of NAPL recovered). The distribution of wells within these categories is provided on Table 2-1.

2.2.1 Primary Recovery Wells

The majority of NAPL (approximately 85 percent of total) was collected from the eight primary locations. The manual management of NAPL at these locations would require that recovery activities be conducted on a weekly basis to ensure that the storage capacity of the well sumps (approximately 7.5 gal.) not be exceeded. This frequency of monitoring/collection was not thought to be cost-effective or practical given site access issues and the level of activity on the Cooper Tank facility. As a result, the wells at these eight locations were automated by setting NAPL recovery pumps in the wells.

2.2.2 Secondary Recovery Wells

Fifteen percent of the NAPL was collected from five secondary wells. The manual management of NAPL at these locations would require that recovery activities be conducted on a monthly basis to ensure that the storage capacity of the well sumps is not exceeded. Long-term manual monitoring/recovery at this frequency was not thought to be cost effective, and these locations were also automated by setting NAPL recovery pumps in the wells.

2.2.3 Gauging Wells

NAPL levels at the 10 remaining wells were consistently observed to be within the wells sumps at each location. It was believed that NAPL at these locations could be effectively managed on a quarterly basis using manual recovery techniques.

2.3 Automated System Operation

The Primary and Secondary recovery well locations (Figure 2-3) are equipped with fixed speed pumps manufactured by Pump Works and/or Linear Pumps. Note that the equipment designed by Linear Pumps has been determined to be better suited to site conditions and will be used to replace the Pump Works equipment over time. The well pumps are controlled with timers that are adjusted, as required, to contain the NAPL within the sump of each well, but at a level above the inlet to the pump to minimize the collection of groundwater.

Collected NAPL is accumulated in a 500 gallon capacity double-walled polyethylene tank located above ground in the system's control trailer on the 254 parcel (Figure 2-4). The accumulation tank is equipped with a high liquid level detector to prevent over-filling, as well as secondary containment. The system is equipped with additional alarms and communication equipment to ensure its safe operation.

The Gauging Wells are monitored during quarterly inspection activities and accumulated NAPL is recovered using an air lift system that consists of an air compressor and sample line (1 in O.D. black iron pipe) that runs from the bottom of the well sump to a closed 55 gallon drum and is operated in the following manner:

- A small stream of compressed air is introduced into the bottom of the sample line through a "T" connection.
- The upward movement of the air "bubble" creates a vacuum that draws NAPL upward from the sump and into the drum.

- The consistency of the stream is observed until the fluid being removed appears to be clear (i.e., NAPL is no longer being removed). At that point, the air flow is discontinued and the volume of collected NAPL is measured and recorded.

The collected NAPL is stored in sealed drums and collected with the NAPL from the accumulation tank at regular intervals by a certified waste hauler.

3.0 System Performance

The following discussion provides summaries of NAPL recovery and waste management observations during the initial year of system operation (July 2014 to June 2015), as well as a discussion of the associated maintenance and response activities.

3.1 NAPL Recovery

Monitoring and recovery activities were conducted upon system start up (July 14, 2014) and on an approximate quarterly basis through June 3, 2015. The results from the monitoring of the automated and gauging wells are discussed below.

3.1.1 Automated Wells

The observed NAPL thickness during the 11 initial gauging events (Section 2.2) generally ranged from 5 ft. to approximately 14 ft. The initial pumping rates were set as follows based upon the results from the initial gauging events:

- Primary Recovery Wells – 0.2 gallons per minute (gpm) for approximately 5 minutes per day to achieve a recovery rate of approximately 1 gpd.
- Secondary Recovery Wells - 0.01 to 0.05 gpm for approximately 10 minutes per day to achieve a recovery rate of 0.1 to 0.5 gpd.

The initial rates were intended to be adjusted during subsequent quarterly events to maintain the NAPL thickness at a point within the well sump, but above the pump inlet at each location.

The results from the gauging activities during the initial period of system operation are summarized in Table 3-1. Adjustments to the pumping rates through early January 2015 were not sufficient to contain NAPL within the sumps at all locations and the effort was complicated by maintenance issues during January and February 2015 (Section 3.3). A regulatory issue related to waste characterization also complicated the optimization of pumping rates. In late March 2015, Tradebe notified National Grid that a routine analysis of the drums containing NAPL from the gauging wells indicated the presence of concentrations of methylene chloride (290 ppm) and perchloroethylene (10,000 ppm). The level of perchloroethylene was sufficient to classify the NAPL as a Toxicity Characteristic Waste. The NAPL recovery system was shut down by National Grid on March 28, 2015 and no additional material was shipped for disposal pending a resolution of the issue. National Grid conducted several rounds of sampling of the NAPL in individual recovery wells and the accumulation tank. The results determined that none of the NAPL in the wells or in the accumulation tank contained detectable levels of chlorinated constituents. The results suggest that the perchloroethylene and methylene chloride in the drums likely originated from the disposal of a small quantity of waste solvent by unknown persons into the existing drums. To limit this from potentially happening in the future, locking bungs were added to all drums and a locked fence with a jersey barrier base was installed around the perimeter of the treatment system. The system was restarted in early May (May 5, 2015) and documentation of the revision to the waste manifest is included in Appendix A.

The April shut down resulted in NAPL thicknesses generally returning to their initial levels (see April 30, 2015 results). In response, the frequency of gauging events was increased to allow for finer

adjustments of the pumping rates. The results from a monitoring event conducted on June 3, 2015 demonstrated that pumping rates are appropriate to contain NAPL levels within the sumps. Approximately 2,270 gallons of mixed fluids have been collected from the system during the initial operating period. An illustration of the cumulative volume of mixed fluids collected over time is provided in Figure 3-1. Observations of the collected material indicate an approximate 80:20 ratio of organic to water, providing for a NAPL collection rate of approximately 6 gallons per day.

3.1.2 Gauging Wells

The results from the monitoring and recovery events are summarized in Table 3-2. As indicated, the NAPL collection rates are relatively low for the locations, with the average thickness in the sumps ranging from less than 1 ft. to 4.7 ft. The results demonstrate that manual gauging on a quarterly basis is appropriate for these locations.

Approximately 130 gallons of mixed fluids have been recovered during the first year of manual recovery. Note that the gauging wells were not pumped during the June 3 event due to schedule limitations. The collected NAPL was transferred to the accumulation tank for subsequent management. The cumulative collection rates for these locations averages 0.4 gpd over the monitoring period. Note that the greater quantity of NAPL collected during the July event is due to the extended period between the prior event and recovery, i.e. 5 months vs. 3 months for the two subsequent events.

3.2 Waste Management

The collected NAPL is managed as an alternative fuel at the Tradebe Facility in Cohoes, N.Y. The results from constituent analyses demonstrate that the collected NAPL meets the criteria to be managed as a non-hazardous waste in accordance with NYSDEC Guidance DER-4, "Management of Coal Tar Waste and Coal Tar Contaminated Soils and Sediment". The data from the analysis to determine flashpoint indicate that the result is subject to sampling variability due to the stratification of water and organic layers in the tank. Generally, the results are greater than 200° F supporting the classification of the collected product as a Class III B Combustible Liquid. However, in several instances, the initial result has been less than 140° F, suggesting the potential for the collected product to be classified as an Ignitable Waste. In these instances, resampling that ensured that the proper ratio of water/organic were incorporated into the sample resulted in a flashpoint result that was greater than 200° F.

The accumulation tank has been emptied on the following dates:

- 9/24/2014 – 266 gallons
- 11/12/2014 – 606 gallons
- 1/21/2015 – 485 gallons
- 2/12/2015 – 110 gallons
- 4/24/2015 – 548 gallons
- 5/8/2015 – 478 gallons

Documentation of the shipments is provided in Appendix A.

3.3 System Maintenance

As of June 1, 2015, the system has been on-line 287 days with 10 days off-line during the periods of January 7 to January 13 and February 20 to February 25 due to ice formation in the NAPL lines at the location where they enter the trailer. This reflects an on-line factor of greater than 95%.

The following incidental maintenance issues were addressed during the monitoring period:

- October 2014 – Pump at RW-22 failed and was replaced with the pump from RW-11, pump at RW-3 was replaced.
- January 2015 – Pump at RW-3 was replaced.
- April 2015 – The Pump Works equipment at locations RW-3 RW-10 and RW-12, were not working properly and were replaced with equipment from Linear Pumps.
- June 2015 – There was an apparent power surge requiring fuses to be replaced at RW-2, RW-10, RW-18 and RW-22.
- June 2015 – The Pump Works equipment at locations RW-2, RW-3, RW-8 and RW-10 were not working properly and were replaced with equipment from Linear Pumps.

Access to RW-3 continues to be an issue. The anticipated paving of the 252 parcel by Cooper Tank has been delayed due to permitting issues. Since the final grade on the 252 Parcel has not been established, the top of the vault for RW-3 continues to be exposed to excessive wear/damage from Cooper Tank operations. A temporary solution has involved temporary grading of the area around the vault and the replacement of the vault lid with steel road plate. Routine access to gauge the NAPL level has not been possible, and the vault routinely fills with soil/debris from the Cooper Tank activities.

3.4 Incidents/Unplanned Releases

There were no incidents or unplanned releases during the reporting period.

4.0 Recommendations for Future Operation

The principal focus for system operation will be to ensure that NAPL levels continue to be stabilized within the sumps at all locations. AECOM continue weekly/bi-weekly gauging event in the near term to confirm that pumping rates are appropriate to maintain NAPL levels in the approximate middle of the sumps. The following additional activities were completed or are proposed:

- A locked drum storage unit has been constructed and will be used to store containerized NAPL recovered from the Gauging Wells pending transport.
- An additional heater was placed in the transition duct between the ground surface and the trailer to address the problem of lines freezing in extreme weather. The addition of insulation to the interior walls of the trailer will be conducted during the summer of 2015.
- The vault at RW-3 will be rehabilitated or replaced during the summer of 2015.
- Additional instrumentation/telemetry will be installed to identify problems associated with power surges, e.g. blown fuses or potential pump operation issues in a timely manner.

5.0 References

AECOM, 2011. Equity Former MGP Site 254 Maspeth Avenue Property Interim Remedial Measure Work Plan. December 16, 2011.

AECOM, 2012. Interim Site Management Plan, Equity Works Former Manufactured Gas Plant Site, Brooklyn, New York, NYSDEC Site No.: 224050, Order on Consent Index #: A2-0552-0606. November 28, 2012.

AECOM, 2015. Completion Report Interim Remedial Measure for NAPL Recovery, Equity Works Former Manufactured Gas Plant Site, Brooklyn, New York, NYSDEC Site No.: 224050, Order on Consent Index #: A2-0552-0606. May 20, 2015.

National Grid, 2012. National Grid Environmental Procedure 2-A, Aboveground Storage Tank Management. December 2012.

New York State Department of Environmental Conservation (NYSDEC), 2002. Management of Coal Tar Waste and Coal Tar Contaminated Soils and Sediment (DER-4). January 11, 2002.

Tables

**Table 2-1
Categories of Recovery Wells
Former Equity Works MGP Site, Brooklyn, New York**

Primary Recovery Wells (collection rate < 1 gpd)

Well	Location	
RW-2	252 Parcel	on-site
RW-3	252 Parcel	on-site
RW-10	254 Parcel	perimeter
RW-12	254 Parcel	perimeter
RW-13	254 Parcel	perimeter
RW-18	254 Parcel	perimeter
RW-19	254 Parcel	perimeter
RW-20	254 Parcel	perimeter

Secondary Recovery Wells (collection rates 0.1 to 0.5 gpd)

Well	Location	
RW-8	254 Parcel	perimeter
RW-9	254 Parcel	perimeter
RW-11	254 Parcel	perimeter
RW-21	254 Parcel	perimeter
RW-22	222 Parcel	perimeter

Gauging Wells (collection rate < 0.1 gpd)

Well	Location	
RW-1	252 Parcel	on-site
RW-4	252 Parcel	on-site
RW-5	252 Parcel	on-site
RW-6	254 Parcel	perimeter
RW-7	254 Parcel	perimeter
RW-11	254 Parcel	perimeter
RW-14	254 Parcel	perimeter
RW-15	254 Parcel	perimeter
RW-16	254 Parcel	perimeter
RW-17	254 Parcel	perimeter
RW-23	222 Parcel	perimeter

Note:

¹ Based on data from initial gauging events - May 2013 through February 2014

**Table 3-1
Product Monitoring and Recovery Automated Wells
Former Equity Works MGP Site, Brooklyn, New York**

Location		Depth of Well (ft.)		Typical Pre-Recovery NAPL Thickness (ft.)	Active Recovery NAPL Thickness (ft.)					
Parcel	Well ID	Design	Measured ^u		7/14/2014	10/3/2014	1/14/2015	4/30/2015	6/3/2015	
On-Site	252	RW- 2	51.00	49.70	12	9.97	2.43	4.55	12.00	4.41
		RW- 3	51.00	50.40	14	No Access	14.41	15.00	15.50	3.11
Perimeter	254	RW- 8	48.00	46.72	3	2.50	2.05	5.05	8.50	1.48
		RW- 9	50.00	48.87	6	9.80	5.80	5.71	6.55	0.65
		RW- 10	46.00	45.30	11	7.22	trace	6.93	12.01	3.41
		RW- 11	46.00	45.73	8	4.10	---	---	---	---
		RW- 12	46.00	45.48	13	4.12	1.05	11.22	11.40	3.20
		RW- 13	46.00	45.53	12	2.75	trace	NM	10.90	trace
	252	RW- 18	50.00	47.50	10	10.00	6.60	7.45	7.70	3.21
		RW- 19	52.00	50.18	12	10.55	6.41	8.23	11.09	trace
		RW- 20	52.00	50.75	11	11.46	11.65	11.58	11.23	trace
		RW- 21	50.00	49.80	5	6.70	trace	0.74	3.95	trace
	222	RW- 22	46.00	42.95	8	No Access	8.74	No Access	8.68	No Access
Product Recovered Gallons (cumulative)						---	666	1345	1650	2272
Gallons per Day						---	6.2	6.4	5.2	7.0

Notes:

Bold Primary Recovery Wells

--- Pump from RW-11 transferred to RW-22 during 10/3/14 event

RW-11 converted to a Gauging Well

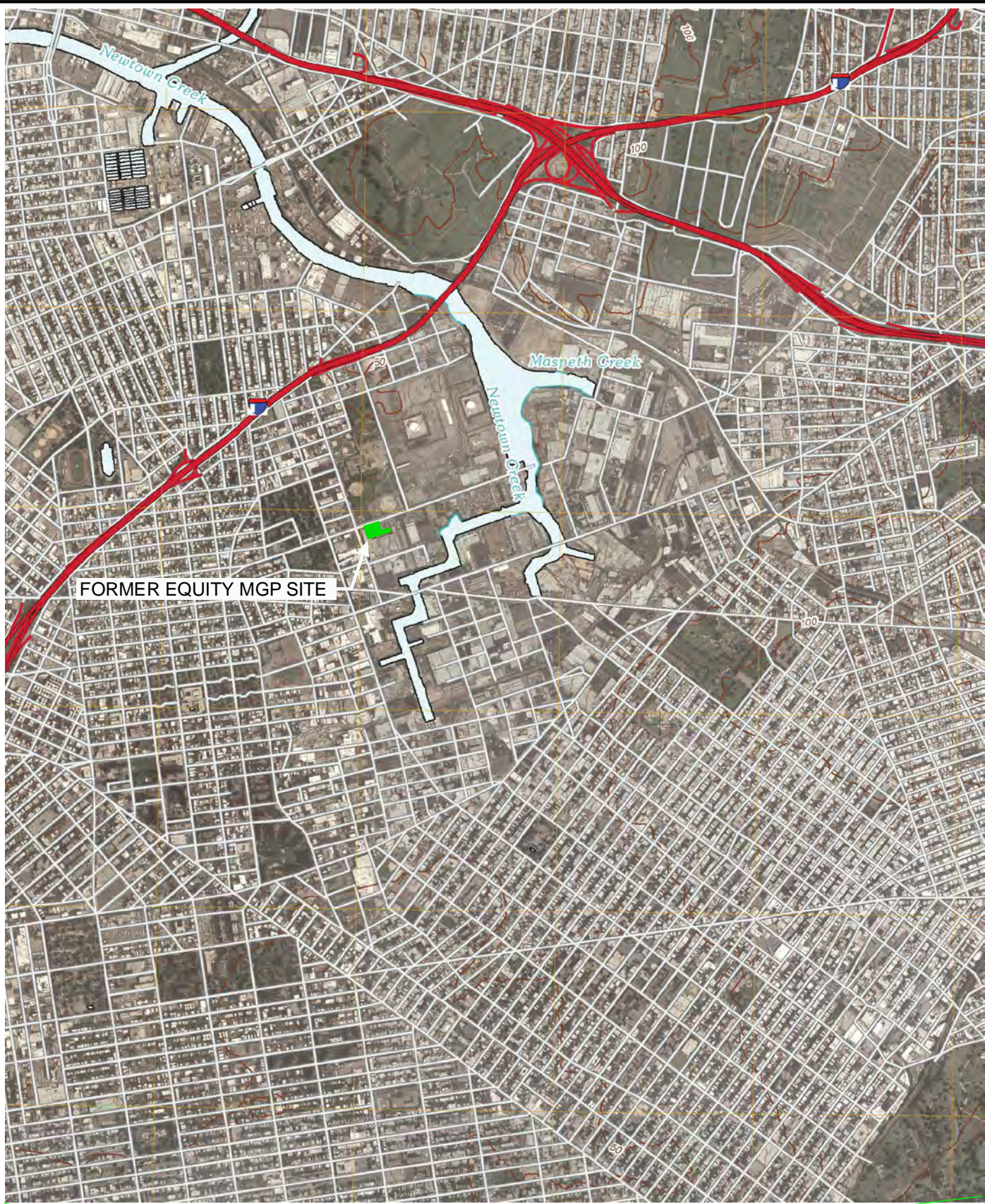
**Table 3-2
Product Monitoring and Recovery Gauging Wells
Former Equity Works MGP Site, Brooklyn, New York**

Location		Depth of Well (ft.)		Typical Pre-Recovery NAPL Thickness (ft.)	NAPL Thickness (ft.)				Mixed Fluids Quantity Recovered (gal.)				
Parcel	Well ID	Design	Measured ^b		7/14/2014	10/3/2014	1/14/2015	4/30/2015	7/14/2014	10/3/2014	1/14/2015	4/30/2015	
On-Site	252	RW- 1	45.00	43.35	3	4.95	1.93	1.17	2.20	8	4.0	3.0	4
		RW- 4	51.00	49.91	trace	0.0	trace	1.21	trace	0.0	0.0	0.0	0
		RW- 5	47.00	44.45	2	3.93	0.85	0.78	0.70	7	3.0	2.0	0
Perimeter	254	RW- 6	47.00	45.72	3	6.6	2.35	3.34	3.95	10.0	5.0	6.0	7
		RW- 7	48.00	46.05	1	2.50	1.00	0.75	1.55	5	3.0	0.0	4
		RW- 11	46.00	45.73	4	---	1.42	3.42	2.95	7.5	4.0	6.0	6
		RW- 14	45.00	45.13	trace	0.00	0.00	NM	trace	0.0	0.0	0.0	0
		RW- 15	45.00	43.72	trace	0.02	trace	0.00	trace	0.0	0.0	0.0	0
		RW- 16	50.00	49.72	1	0.55	trace	0.80	trace	0.0	0.0	0.0	0
	RW- 17	48.00	49.60	6	3.45	4.91	5.64	5.50	7	8.0	8.0	9.5	
222	RW- 23	44.00	41.69	2	No Access	trace	No Access	trace	---			0	
Total										44.5	27.0	25	30.5
Cumulative Total										44.5	71.5	96.5	127

Notes:

RW-11 converted to a Gauging Well during 10/3/14 event

Figures

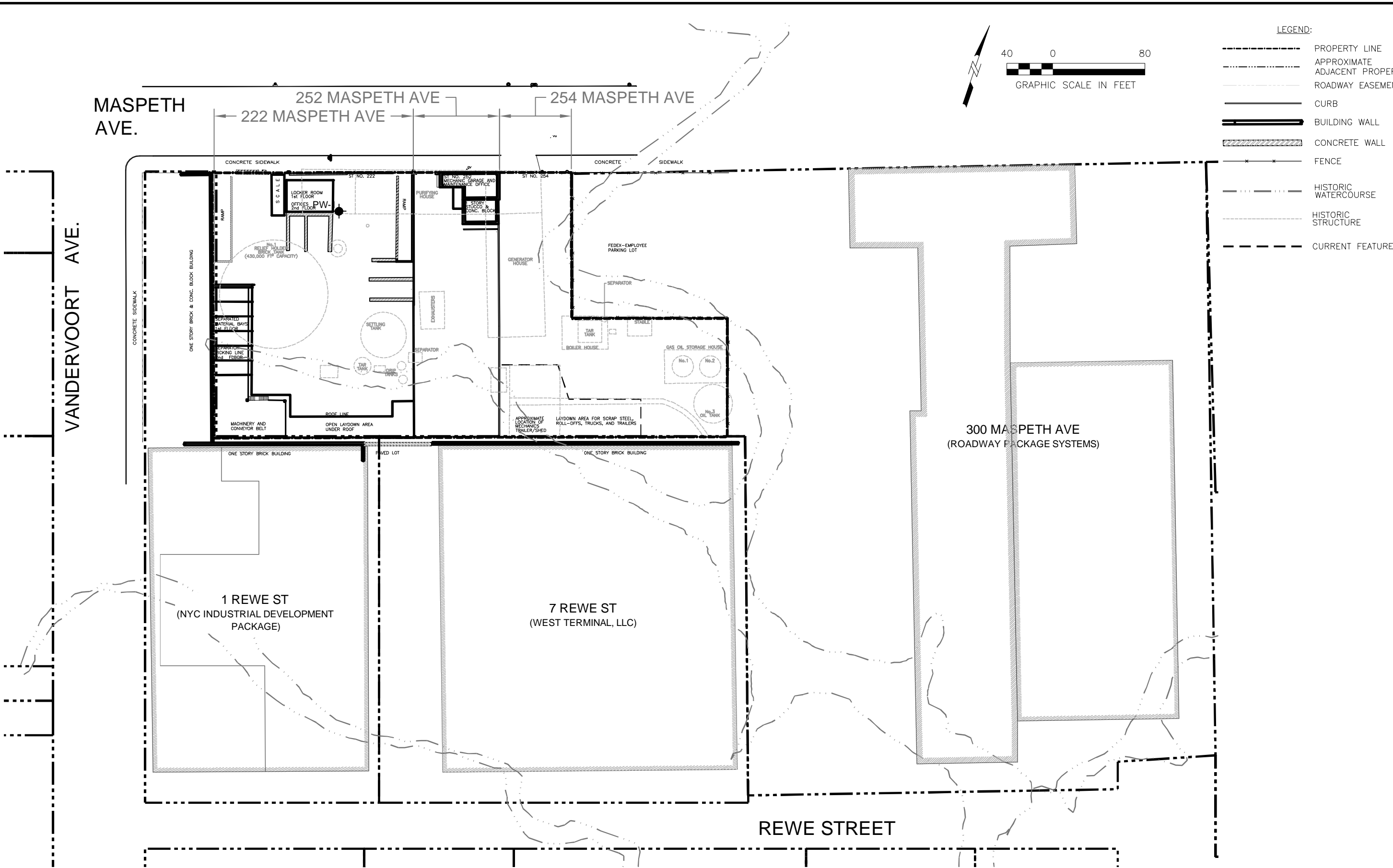


FORMER EQUITY MGP SITE



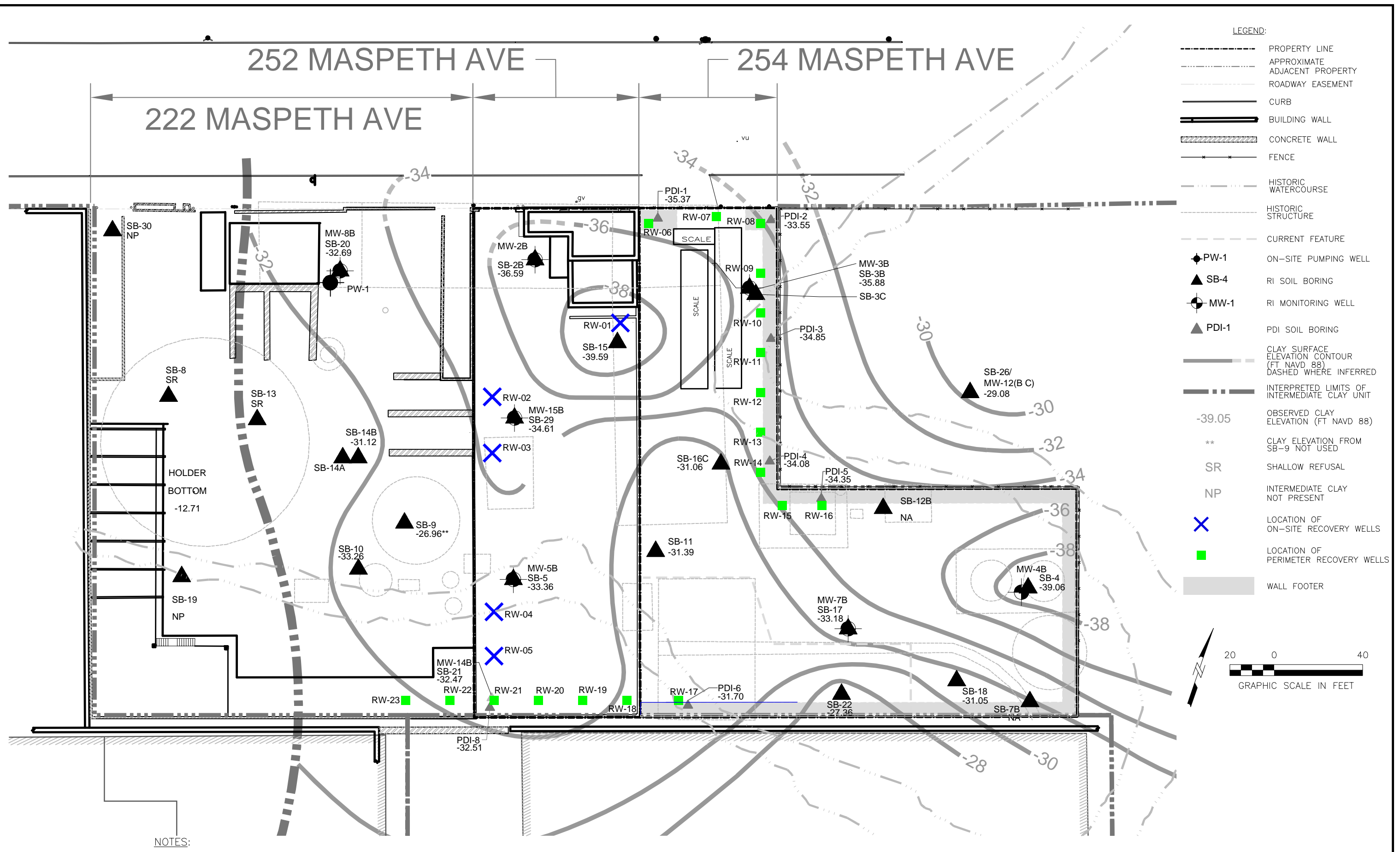
NATIONAL GRID FORMER EQUITY WORKS MGP SITE, BROOKLYN NY	
DATE: 12/2012	DRWN: BcV/C-MA

SITE LOCATION
FIGURE 1-1



NATIONAL GRID FORMER EQUITY WORKS MGP SITE, BROOKLYN NY 60137362-400		SITE PROPERTIES
DATE: 12/2012	DRWN: BcV/C-MA	FIGURE 1-2

File: J:\Rem_Eng\Project Files\National Grid\1765-076 Equity Former MGP 7.2 CADD & GIS\2012-IRM_PRODUCT-RECOVERY\WorkPlan_figures\60137362-660_A5.dwg Layout: Layout1 User: vershobh Plotted: Dec 11, 2012



- LEGEND:**
- PROPERTY LINE
 - - - - - APPROXIMATE ADJACENT PROPERTY
 - ROADWAY EASEMENT
 - ===== CURB
 - ===== BUILDING WALL
 - ===== CONCRETE WALL
 - FENCE
 - HISTORIC WATERCOURSE
 - HISTORIC STRUCTURE
 - CURRENT FEATURE
 - ◆ PW-1 ON-SITE PUMPING WELL
 - ▲ SB-4 RI SOIL BORING
 - MW-1 RI MONITORING WELL
 - ▲ PDI-1 PDI SOIL BORING
 - CLAY SURFACE ELEVATION CONTOUR (FT NAVD 88) DASHED WHERE INFERRED
 - INTERPRETED LIMITS OF INTERMEDIATE CLAY UNIT
 - 39.05 OBSERVED CLAY ELEVATION (FT NAVD 88)
 - ** CLAY ELEVATION FROM SB-9 NOT USED
 - SR SHALLOW REFUSAL
 - NP INTERMEDIATE CLAY NOT PRESENT
 - × LOCATION OF ON-SITE RECOVERY WELLS
 - LOCATION OF PERIMETER RECOVERY WELLS
 - ===== WALL FOOTER



NOTES:
 1. Final locations of proposed recovery wells will be reviewed with COOPER TANK to address facility operations and structures.



NATIONAL GRID FORMER EQUITY WORKS MGP SITE, BROOKLYN NY 60137362-400		LOCATIONS OF ON-SITE AND PERIMETER RECOVERY WELLS
DATE: 12/11/12	DRWN: BcV/C-MA	FIGURE 2-1

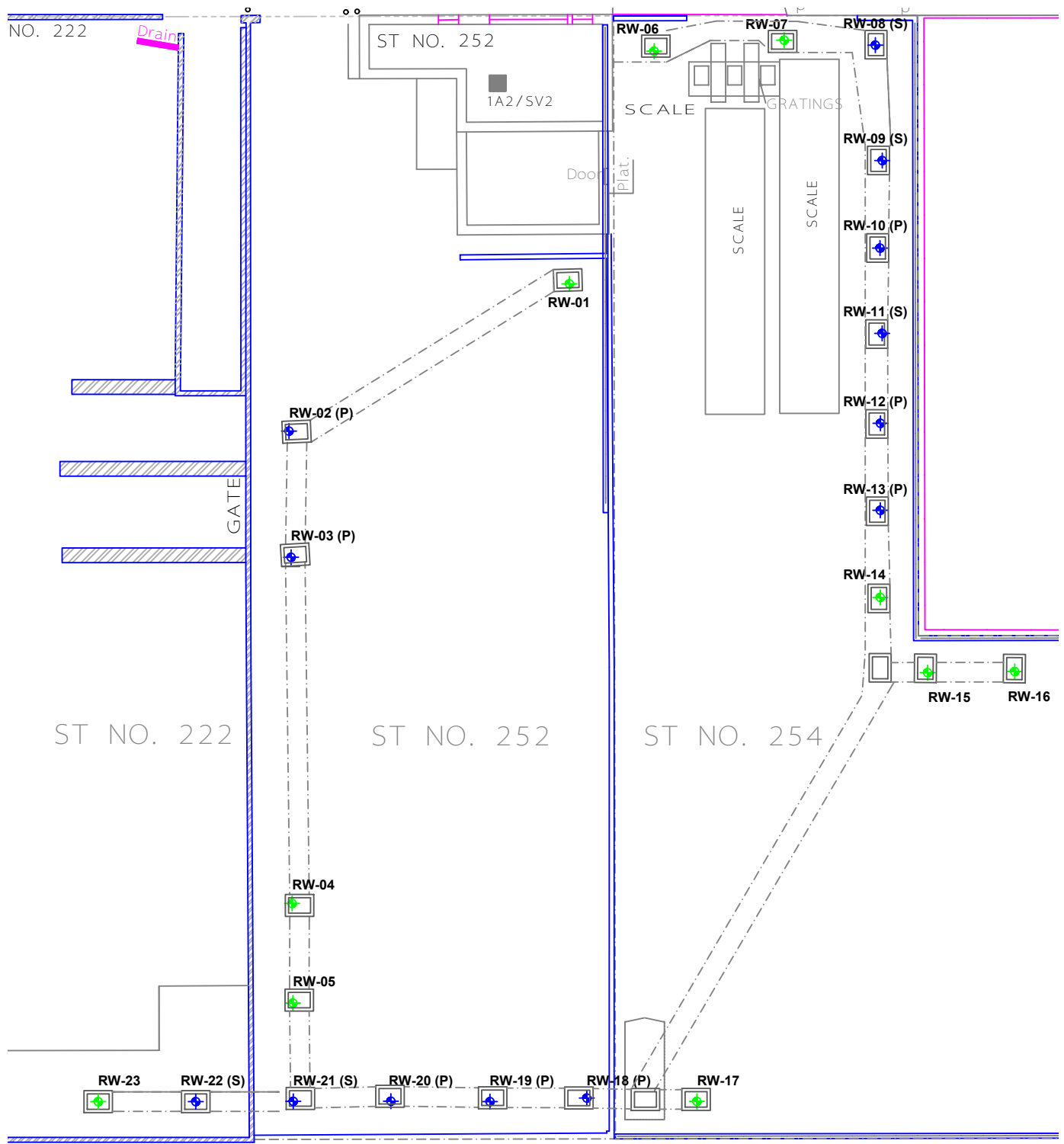


AECOM




NATIONAL GRID
FORMER EQUITY WORKS MGP SITE,
BROOKLYN, NY
60137362.660

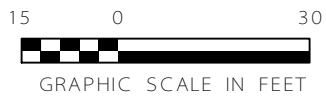
COMPLETED WELL
LOCATION

Figure 2-2



LEGEND

-  RW-02 (P) AUTOMATED WELLS - PRIMARY (APPROX. COLLECTION RATE > 1 GPD)
-  RW-08 (S) AUTOMATED WELLS - SECONDARY (APPROX. COLLECTION RATE 0.5-0.1 GPD)
-  RW-01 GAUGING WELLS (APPROX. COLLECTION RATE < 0.1GPD)



NATIONAL GRID FORMER EQUITY WORKS MGP SITE, BROOKLYN NY 60137362.660		LOCATION OF AUTOMATED WELLS
DATE: 10/30/2013	DRWN: BcV/C-MA	FIGURE 2-3

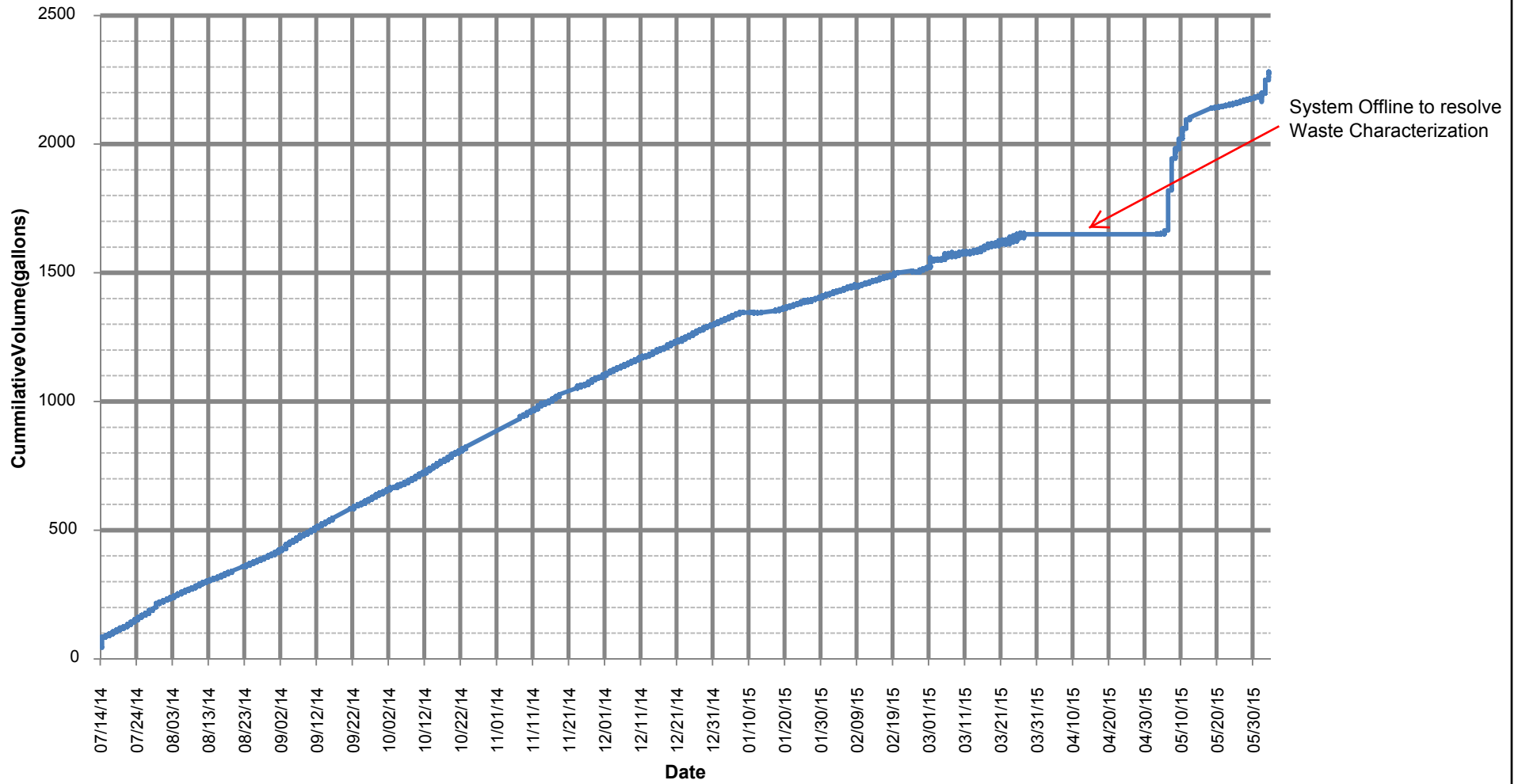


AECOM

NATIONAL GRID
FORMER EQUITY WORKS MGP SITE,
BROOKLYN, NY
60137362.660

CONTROL TRAILER

Figure 2-4



Note: Mixed Fluids are estimated to contain 80% NAPL



NATIONAL GRID
 FORMER EQUITY WORKS MGP SITE,
 BROOKLYN, NY
 60137362.660

Cumulative Volume of Mixed Fluids
 Collected IRM for NAPL Recovery

Figure 3-1

Appendix A

Waste Disposal Documentation

NONHAZARDOUS WASTE MANIFEST

Please type (or print)		1. Generator's US EPA ID No. CESQG	Manifest Document No.	2. Page 1 1 of 1
3. Generator's Name and Mailing Address National Grid-SIR Dept 175 E. Old Country Rd - Hicksville, NY 11801		A. Nonhazardous Waste Manifest Document Number UIS A0401535		
4. Generator's Phone (516) 545-2586 <i>ATT Bill Ryan</i>		B. G.S.I. (Gen. Site Address) Former Equity Works MGP S 254 Maspeth Avenue Brooklyn, NY 11211		
5. Transporter 1 Company Name Tradebe Transportation, LLC	6. US EPA ID Number CTD021816889	C. S.T.I. (Trans. Lic. Plate #) AP1476		
7. Transporter 2 Company Name	8. US EPA ID Number	D. Tran. Phone (203 238-6745		
9. Designated Facility Name and Site Address Tradebe Treatment and Recycling of Bridgeport, LLC 50 CROSS STREET BRIDGEPORT, CT 06610		E. S.T.I. (Trans. Lic. Plate #)		
10. US EPA ID Number CTD002593887		F. Tran. Phone ()		
		G. State Facility's ID (Not Required)		
		H. Facility's Phone 203 3341666		
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)		12. Containers No.	13. Total Quantity	14. Unit Wt/Vol
a. NON DOT / NON RCRA REGULATED MATERIAL NONE,NONE,,NONE		001	TT	266 X-X-357
b. 3370 EQ-32				G
c.				EPA NONE STATE CR02
d.				EPA STATE
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above		
a.	c.	Interim 4141	Final	Interim c.
b.	d.	b.	d.	d.
15. Special Handling Instructions and Additional Information EMERGENCY PH# (203)238-6745 a) ERG# N/A - P082713010NO				
Point of Departure:				
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, and all applicable State laws and regulations.				
Printed/Typed Name E Miller <i>AGENT FOR NATIONAL GRID NY</i>		Signature <i>[Signature]</i>		Month Day Year 29 24 14
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name CHRISTOPHER JACKEN		Signature <i>[Signature]</i>		Month Day Year 29 24 14
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		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 Salve Burgess		Signature <i>[Signature]</i>		Month Day Year 29 24 14

Certificate of Disposal

This is to certify that materials from Natural Phil. Str. on non-hazardous waste manifest number MS# 044535 were received at Tradebe Treatment and Recycling of Bridgeport LLC. The materials were treated at our facility at 50 Cross Street, Bridgeport Connecticut. The petroleum and/or solid phase were blended with other materials and burned for its thermal value. The aqueous phase was treated by ultrafiltration, chemical precipitation and carbon absorption.

If you have any questions or would like to visit our facility, please feel free to contact us at (203) 238-6745. Thank you for choosing Tradebe Treatment and Recycling of Bridgeport LLC for your treatment and recovery needs.

Date

9-24-14

Shawn Poling

Shawn Poling
Facility Manager

NON-HAZARDOUS WASTE MANIFEST		1. Generator ID Number 08203 N/A	2. Page 1 of 1	3. Emergency Response Phone 2032386745	4. Waste Tracking Number 794968
5. Generator's Name and Mailing Address BROOKLYN UNION GAS WORKS DISA NATIONAL GRID NY ONE METROTECH CENTER ATTN: ANDREW PROPHETE BROOKLYN, NY 11201 Generator's Phone: 978-764-4257			Generator's Site Address (if different than mailing address) FORMER EQUITY WORKS MGP SITE 264 MASPETH AVENUE BROOKLYN, NY 11211		
6. Transporter 1 Company Name TRADEBE TRANSPORTATION, LLC			U.S. EPA ID Number CTD021616888		
7. Transporter 2 Company Name			U.S. EPA ID Number		
8. Designated Facility Name and Site Address TRADEBE T&R OF BRIDGEPORT, LLC 50 CROSS STREET BRIDGEPORT, CT 06610 Facility's Phone:			U.S. EPA ID Number CTD002593887		
9. Waste Shipping Name and Description		10. Containers		11. Total Quantity	12. Unit WL/Vol.
		No.	Type		
1. NON DOT / NON RCRA REGULATED MATERIAL		1	TT	606	G
2. 3370 EQ-30					
3.					
4.					
13. Special Handling Instructions and Additional Information 01) ERG P082713010NO SO: 794968					
14. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.					
Generator's/Offlor's Printed/Typed Name E Miller NATIONAL GRID NY		Signature <i>[Signature]</i>		Month 11	Day 12
15. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____					
16. Transporter Acknowledgment of Receipt of Materials					
Transporter 1 Printed/Typed Name CHRISTOPHER JACKEN		Signature <i>[Signature]</i>		Month 11	Day 12
Transporter 2 Printed/Typed Name		Signature		Month	Day
17. Discrepancy					
17a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection					
17b. Alternate Facility (or Generator) Manifest Reference Number: _____ U.S. EPA ID Number _____					
17c. Signature of Alternate Facility (or Generator) _____ Month _____ Day _____ Year _____					
18. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 17a					
Printed/Typed Name Solee Burgos		Signature <i>[Signature]</i>		Month 11	Day 12

400 55320

Certificate of Disposal

This is to certify that materials from Berkley, Inc. on non-hazardous waste manifest number 794968 were received at Tradebe Treatment and Recycling of Bridgeport LLC. The materials were treated at our facility at 50 Cross Street, Bridgeport Connecticut. The petroleum and/or solid phase were blended with other materials and burned for its thermal value. The aqueous phase was treated by ultrafiltration, chemical precipitation and carbon absorption.

If you have any questions or would like to visit our facility, please feel free to contact us at (203) 238-6745. Thank you for choosing Tradebe Treatment and Recycling of Bridgeport LLC for your treatment and recovery needs.

11-12-14

Date

Shawn Poling

Shawn Poling
Facility Manager



NON-HAZARDOUS WASTE MANIFEST	1. Generator ID Number 023000 N/A	2. Page 1 of 1	3. Emergency Response Phone 2032386745	4. Waste Tracking Number 838605
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5. Generator's Name and Mailing Address BROOKLYN UNION GAS D/B/A NAT'L GRID NY ONE METRO CENTERATTN: DOANLD CAMPBEL BROOKLYN, NY 11201 Generator's Phone: 718 9635453	Generator's Site Address (if different than mailing address) FORMER EQUITY WORKS MGP SITE 254 MASPETH AVENUE BROOKLYN, NY 11211
---	---

6. Transporter 1 Company Name TRADEBE TRANSPORTATION, LLC	U.S. EPA ID Number CTD021816889
---	---

7. Transporter 2 Company Name	U.S. EPA ID Number
-------------------------------	--------------------

8. Designated Facility Name and Site Address TRADEBE T&R OF BRIDGEPORT, LLC 50 CROSS STREET BRIDGEPORT, CT 06610 Facility's Phone: (203)334-1666	U.S. EPA ID Number CTD002593887
--	---

9. Waste Shipping Name and Description	10. Containers		11. Total Quantity	12. Unit WL/Vol.	13. Special Handling Instructions and Additional Information
	No.	Type			
NON DOT / NON RCRA REGULATED MATERIAL	1	TT	0485	G	CR02 4/00/4/05
2. 3370 EQ-31					
3.					
4.					

13. Special Handling Instructions and Additional Information
001) ERG P082713010ND 50: 838605

14. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.

Generator's/Offoror's Printed/Typed Name ETHEL AUST FOR NATIONAL GRID NY	Signature 	Month Day Year 1 21 15
--	---------------	----------------------------------

15. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.	Port of entry/exit:	Date leaving U.S.:
--	---------------------	--------------------

16. Transporter Acknowledgment of Receipt of Materials	Signature	Month Day Year
Transporter 1 Printed/Typed Name CHRISTOPHER JACKSON		1 21 15
Transporter 2 Printed/Typed Name	Signature	Month Day Year

17. Discrepancy	17a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection
-----------------	--

17b. Alternate Facility (or Generator)	Manifest Reference Number:	U.S. EPA ID Number
--	----------------------------	--------------------

17c. Signature of Alternate Facility (or Generator)	Month Day Year
---	----------------

18. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 17a	Signature 	Month Day Year 1 21 15
Printed/Typed Name Solee Burgos		

90072294

DESIGNATED FACILITY TO GENERATOR

Certificate of Disposal

This is to certify that materials from Brooklyn Union Gas on non-hazardous waste manifest number 838605 were received at Tradebe Treatment and Recycling of Bridgeport LLC. The materials were treated at our facility at 50 Cross Street, Bridgeport Connecticut. The petroleum and/or solid phase were blended with other materials and burned for its thermal value. The aqueous phase was treated by ultrafiltration, chemical precipitation and carbon absorption.

If you have any questions or would like to visit our facility, please feel free to contact us at (203) 238-6745. Thank you for choosing Tradebe Treatment and Recycling of Bridgeport LLC for your treatment and recovery needs.

1-21-15

Date

Shawn Poling
Shawn Poling
Facility Manager



WASTE MANIFEST

N/A

2. Page 1 of 1 3. Emergency Response Phone 2032332745 4. Waste Tracking Number 849632

5. Generator's Name and Mailing Address: BROOKLYN UNION GAS D/B/A NATL GRID ONE METRO CENTER ATTN: DONALD CAMPBELL BROOKLYN, NY 11201 978-764-4227 Generator's Site Address (if different than mailing address): FORMER EQUITY WORKING MGP SITE 254 MASSPETH AVENUE BROOKLYN, NY 11211

6. Transporter 1 Company Name: TRADESS TRANSPORTATION, LLC U.S. EPA ID Number: CTD021616889

7. Transporter 2 Company Name: U.S. EPA ID Number:

8. Designated Facility Name and Site Address: TRADESS TPA OF BRIDGEPORT, LLC 50 CROSS STREET BRIDGEPORT, CT 06610 (203)334-1666 U.S. EPA ID Number: CTD022593887

Table with 5 columns: 9. Waste Shipping Name and Description, 10. Containers (No., Type), 11. Total Quantity, 12. Unit Wt./Vol., and a handwritten column. Row 1: NA1993, waste Combustible liquid, Pe II, (Tetrachloroethylene, Methylene Chloride), 2, 110, G, FOOD DO39, CAC2

13. Special Handling Instructions and Additional Information: P0837130101044 #1000099672 EQUITY (hrz) 3370 EQ-33

14. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.

Generator's/Offor's Printed/Typed Name: W F Miller & Genl Educationl Grid NY Signature: [Signature] Month Day Year: 12/12/15

15. International Shipments: [] Import to U.S. [] Export from U.S. Port of entry/exit: Date leaving U.S.:

16. Transporter Acknowledgment of Receipt of Materials: Transporter 1 Printed/Typed Name: Roy Laudate Signature: [Signature] Month Day Year: 02/12/15

Transporter 2 Printed/Typed Name: Signature: Month Day Year:

17. Discrepancy: 17a. Discrepancy Indication Space: [] Quantity [X] Type [] Residue [] Partial Rejection [] Full Rejection

17b. Alternate Facility (or Generator): U.S. EPA ID Number:

Facility's Phone:

17c. Signature of Alternate Facility (or Generator): Month Day Year:

18. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 17a

Printed/Typed Name: Deborah Duquette Signature: [Signature] Month Day Year: 02/12/15



TRADEBE
Environmental Services™

Unmanifested Waste Report

3-6-15

Dept. of Energy & Environmental Protection
State Office Building
79 Elm Street
Hartford CT 06106-0127
DEEP.Manifests@ct.gov

Dear Sir or Madam:

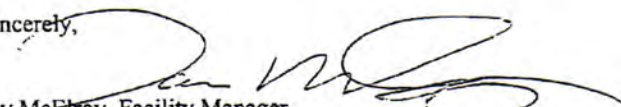
This letter is being sent to report an unmanifested shipment into our facility, Tradebe Treatment and Recycling of Bpt., Ct. LLC. Located at 50 Cross Street., Bridgeport, Ct., EPA ID#CTD002593887, as required under 40 CFR 264.76. The material was originally thought to be non-hazardous and was received on a non-hazardous waste manifest number 849632 on 2-12-15. Upon receiving and testing the 2-drums, 2 out of the 2 drums was found to contain Methylene Chloride and Tetrachloroethylene.

The transporter is Tradebe Transportation, LLC Services, 136 Gracey Ave., Meriden CT; CTD021816889
The correct DOT shipping name should be: NA1993, Waste Combustible Liquid, PGI (Tetrachloroethylene, Methylene Chloride)
The correct waste codes are: F002, D039

The material is fuel blended as a Hazardous Waste Fuel for an affiliated offsite facility. The generator of the material, Brooklyn Union Gas, D/B/A Natl. Grid., has been informed. Their site address is 254 Maspeth Avenue, Brooklyn, NY. 11211. I have also enclosed a copy of the original non-hazardous manifest, which was initially used for the shipment. Please make the necessary changes to your record. If you have any questions, please feel free to contact me at (203) 334-1666.

I certify under penalty of law I have personally examined and am familiar with the information submitted in this document and all attachments and that based on my inquiry of those individuals directly responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including possible fines and imprisonment.

Sincerely,


Jay McElroy, Facility Manager
Tradebe Treatment and Recycling Northeast, LLC

Cc: Brooklyn Union Gas D/B/A Natl. Grid
Tradebe Transportation LLC

NON-HAZARDOUS WASTE MANIFEST	1. Generator ID Number 6ES945 N/A	2. Page 1 of 1	3. Emergency Response Phone 2032386745	4. Waste Tracking Number 916910
5. Generator's Name and Mailing Address BROOKLYN UNION GAS DBA NAT'L GRID N.Y. ONE METRO CENTER BROOKLYN, NY 11201 978-764-4257		Generator's Site Address (if different than mailing address) FORMER EQUITY WORKS HEP SITE 254 MASPETH AVENUE BROOKLYN, NY 11211		
6. Transporter 1 Company Name TRADEBE TRANSPORTATION, LLC		U.S. EPA ID Number CTD021816489		
7. Transporter 2 Company Name		U.S. EPA ID Number		
8. Designated Facility Name and Site Address TRADEBE TR of BRIDGEPORT, LLC 50 CROSS STREET BRIDGEPORT, CT 06610 (203)334-1666		U.S. EPA ID Number CTD002593387		
9. Waste Shipping Name and Description		10. Containers		11. Total Quantity
		No.	Type	12. Unit Wt./Vol.
NON DOT / NON RCRA REGULATED MATERIAL		1	TT	548
G		CR03		
13. Special Handling Instructions and Additional Information NON DOT / NON RCRA REGULATED MATERIAL 916910				
14. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.				
Generator's/Offeor's Printed/Typed Name		Signature		Month Day Year
15. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____				
16. Transporter Acknowledgment of Receipt of Materials				
Transporter 1 Printed/Typed Name		Signature		Month Day Year
Transporter 2 Printed/Typed Name		Signature		Month Day Year
17. Discrepancy				
17a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection				
17b. Alternate Facility (or Generator) Manifest Reference Number: U.S. EPA ID Number				
4-24-15				
17c. Signature of Alternate Facility (or Generator)		Month Day Year		
18. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 17a				
Printed/Typed Name		Signature		Month Day Year



NON-HAZARDOUS
WASTE MANIFEST

1. Generator ID Number

N/A

2. Page 1 of 1

3. Emergency Response Phone
2032386745

4. Waste Tracking Number
929449

5. Generator's Name and Mailing Address
BROOKLYN UNION GAS D/B/A NAT'L GRID
ONE METRO CENTER
BROOKLYN, NY 11201
Generator's Phone: **978-764-4257**

Generator's Site Address (if different than mailing address)
FORMER EQUITY WORKS MGP SITE
254 MASPETH AVENUE
BROOKLYN, NY 11211

6. Transporter 1 Company Name
TRADEBE TRANSPORTATION, LLC

U.S. EPA ID Number
CTD021816889

7. Transporter 2 Company Name

U.S. EPA ID Number

8. Designated Facility Name and Site Address
TRADEBE T&R OF BRIDGEPORT, LLC
50 CROSS STREET
BRIDGEPORT, CT 06610
Facility's Phone: **(203)334-1666**

U.S. EPA ID Number
CTD002593887

9. Waste Shipping Name and Description

10. Containers

No. Type

11. Total Quantity

12. Unit Wt./Vol.

NON DOT / NON RCRA REGULATED MATERIAL

1

TT

478

G

CR02

H/BS

13. Special Handling Instructions and Additional Information
001) ERG P082713010NO SO: 929449

3370 EQ-35

14. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.

Generator's/Offero Printed/Typed Name **AGENT FOR EMILLER NATIONAL GRID NY**

Signature

Month Day Year
5 8 15

15. International Shipments Import to U.S.

Export from U.S.

Port of entry/exit:

Date leaving U.S.:

Transporter Signature (for exports only):

16. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name

Signature

Christopher Jensen

Month Day Year
5 8 15

Transporter 2 Printed/Typed Name

Signature

Month Day Year

17. Discrepancy

17a. Discrepancy Indication Space Quantity

Type

Residue

Partial Rejection

Full Rejection

Manifest Reference Number:

U.S. EPA ID Number

17b. Alternate Facility (or Generator)

Facility's Phone:

17c. Signature of Alternate Facility (or Generator)

Month Day Year

18. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 17a

Printed/Typed Name

Signature

Annette Garcia

Month Day Year
05 08 15

Certificate of Disposal

This is to certify that materials from Brookline Union Ave on non-hazardous waste manifest number 929149 were received at Tradebe Treatment and Recycling of Bridgeport LLC. The materials were treated at our facility at 50 Cross Street, Bridgeport Connecticut. The petroleum and/or solid phase were blended with other materials and burned for its thermal value. The aqueous phase was treated by ultrafiltration, chemical precipitation and carbon absorption.

If you have any questions or would like to visit our facility, please feel free to contact us at (203) 238-6745. Thank you for choosing Tradebe Treatment and Recycling of Bridgeport LLC for your treatment and recovery needs.

5-8-15

Date

Jason McElroy

Jason McElroy
Facility Manager