

**ENVIRONMENTAL COMPLIANCE
ASSESSMENT OF
TULLY LAKE
ROYALSTON, MASSACHUSETTS**

**PRELIMINARY FINDINGS REPORT
U.S. Army Corps of Engineers
New England Division**

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12a. DISTRIBUTION / AVAILABILITY STATEMENT Approved for public release Distribution is unlimited			12b. DISTRIBUTION CODE	
13. ABSTRACT (Maximum 200 words) The environmental compliance assessment of Tully Lake in Royalston, Massachusetts was conducted as part of the U.S. Army Corps of Engineers Environmental Review Guide for Operations (ERGO) program. The findings at Tully Lake are as follows: There were one Major Deficiencies (Problems that require action and pose a threat to human health, safety or to the environment); twenty-five Minor Deficiencies (Deficiencies that are mostly administrative in nature which requires monitoring or planning for future mitigation); and thirteen Management Practices (Items noted are not specifically covered by laws or regulations; however, they still require management attention). Overall, the project was well maintained as demonstrated by the lack of serious environmental deficiencies.				
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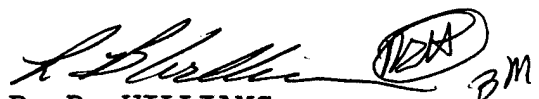
6 October 1992

MEMORANDUM THRU Chief, Project Operations and Readiness Division
FOR Director of Operations

SUBJECT: Environmental Compliance Assessment of Tully Lake


1. Attached please find the Environmental Compliance Assessment of Tully Lake, utilizing the Environmental Review Guide for Operations (ERGO).
2. This compliance assessment was prepared by the NED ERGO Team, Bruce Williams (NED-OD-P), Jim Law (NED-OD-P), Mike Penko (NED-PL-IA), Townsend Barker (NED-ED-WQ), Jim Peck (NED-SO), and Anne Laster (NED-RE).
3. Upon approval of the assessment, the Project Manager, Tully Lake, will develop an action plan to prioritize and correct findings identified in the ERGO assessment. In order that resources are programmed and dedicated to correct these problems, recommend that remediation which can be performed as routine maintenance work be completed within the next 3 years, other work should be programmed in the budget process for completion within 5 years.
4. I recommend your approval for implementation.

Atch


R. B. WILLIAMS
ERGO Program Manager

CMT 2

Environmental Compliance Assessment of Tully Lake
is approved X disapproved _____ for implementation as stated.


J. C. WONG
Director of Operations

**ENVIRONMENTAL COMPLIANCE
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For Inter Corps Office Distribution Only

EXECUTIVE SUMMARY

An environmental compliance assessment of Tully Lake in Royalston and Athol, Massachusetts was conducted by an interdisciplinary team of New England Division environmental professionals from 4-8 May 1992.

The assessment was conducted as part of the U.S. Army Corps of Engineers Environmental Review Guide for Operations (ERGO) program. The ERGO program establishes the use of environmental compliance assessments to ensure compliance with all applicable Federal, state, local, Department of Defense (DoD), and U.S. Army laws and regulations.

An overall ERGO compliance assessment considers 12 major environmental compliance categories. Each category, Federal, state and local laws, DoD and U.S. Army Corps of Engineers regulations, and good management practices are reviewed.

Overall the project was well maintained as demonstrated by the lack of serious environmental deficiencies. The findings at Tully Lake are as follows:

Significant Deficiencies - None

Problems that pose a direct & immediate threat to human health, safety of to the environment.

Major Deficiencies - One (1)

Problems that require action and pose a threat to human health, safety or to the environment.

Minor Deficiencies - 25

Deficiencies that are mostly administrative in nature. These problems require monitoring or planning for future mitigation.

Management Practices - 13

Items noted are not specifically covered by laws or regulations; however, they still require management attention.

* Note A special thanks to Steve Andon of NED Emergency Operations Center for assigning LTC Douglas Outlaw to the ERGO program during LTC Outlaw's two week tour of duty from 27 April to 8 May 1992. LTC Outlaw's professional performance and specific knowledge of federal environmental compliance regulations was very beneficial to the successful completion of the Tully Lake compliance assessment.

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THE ERGO PROGRAM

The U.S. Army Corps of Engineers initiated the Environmental Review Guide for Operations (ERGO) program as a comprehensive self-evaluation and program management system for achieving, maintaining, and monitoring compliance with environmental laws and regulations at Corps of Engineers projects and facilities. Objectives of the ERGO program are to:

- 1) Enhance Corps of Engineers environmental compliance at federal, state, and local levels.
- 2) Improve Corps of Engineers environmental management.
- 3) Build supporting financial programs and budgets.
- 4) Assure supervisors their environmental programs are being implemented effectively in accordance with Corps of Engineer goals and objectives.

Periodic internal environmental compliance assessments have been deemed necessary. These evaluations are designed to assess environmental compliance and to provide necessary feedback to supervisors for organizing, directing, and controlling environmental compliance and protection activities.

The Corps of Engineers ERGO program began with the creation of a steering committee. Arrangements were made with the U.S Army Construction Engineering Research Laboratory (USACERL) to compile all relevant federal, Department of Defense, Army, Corps of Engineer and state and local laws and regulations to produce the draft manual.

The ERGO manual of environmental compliance assessments was pilot tested at various facilities in the Nashville District in May 1990. The program was field tested at several projects during FY 1991 and the manual was distributed as a final draft.

In January 1991, the Chief, Operations, Construction and Readiness Division (USACE), directed division and district operations offices to formally designate Environmental Compliance Coordinators (ECC's). Because it is responsible for the majority of USACE facilities, Operations Directorate was tasked with the development and maintenance of the ERGO program.

New England Division's ERGO program became operational in August 1991. An ERGO review team was established by the ECC in October 1991. The ERGO program manager scheduled 8 projects, including Tully Lake, for completion of environmental compliance evaluations in FY-92.

EVALUATION PROCEDURES

The ERGO evaluation of Tully Lake was conducted by a 6 person team comprised of NED personnel. The team followed a three phase approach. The first phase was to obtain pre-assessment information (see Appendix A) from the site concerning on-site activities and review applicable state or local environmental regulations.

The second phase involved the on-site portion of the assessment. This involved a briefing of project, district and/or regional management and staff, followed by a facility tour to obtain a general overview of facility operations. Typically, the team member would interview project staff responsible for a particular functional area, visually inspect the project/facility, and verify that required written documentation was in place. When possible, all deficiencies were reported to facility personnel. The team concluded the on-site portion of the assessment by briefing the project manager and staff to apprise them of the review team's findings.

The third phase involves developing the draft report and developing an action plan for addressing outstanding deficiencies. The evaluation of Tully Lake followed the above procedures and covered the elements set forth in the 12 ERGO compliance categories.

The assessment was conducted in accordance with the best professional judgement of the ERGO team members. It should be understood that the assessment consisted of reported and sample observations taken over a short span of time relative to the period under review. Efforts were directed toward reviewing major facets of environmental performance in the period covered, and therefore, it is important to recognize that this assessment may not necessarily identify all potential problems.

Successful completion of the site-specific environmental evaluation of Tully Lake was reliant on complete foreclosure of all information regarding the operation and maintenance activities at the project.

It should be noted that failure of a manager to provide complete or adequate information to the review team does not relieve the manager of the responsibility for compliance with environmental regulations.

ERGO MANUAL OBJECTIVES

The Environmental Review Guide for Operations (ERGO) manual is intended to serve as the primary tool for conducting environmental compliance evaluations at Corps of Engineer projects and facilities. The objectives of the program are to:

- 1) Compile applicable Federal laws and regulations associated with Corps of Engineers operations and activities.
- 2) Synthesize environmental regulations, good management practices, and risk management issues into consistent and easy to use checklists.
- 3) Serve as a reference document for daily operations.
- 4) Serve as a standard for evaluation of environmental compliance.

DESCRIPTION OF REGULATORY COMPLIANCE

This section of the report presents a summary of findings in those categories that are governed by engineering regulations, engineering manuals, federal regulations, and state regulations. Non-regulatory items, which are referred to in this report as a management practices, are of a lower priority but require attention to correct.

Deficiencies noted in this evaluation will include the following information:

SIGNIFICANT DEFICIENCY (SIG.):

A problem categorized as significant requires immediate attention. It poses, or has high likelihood of posing, a direct and immediate threat to human health, safety, the environment, or the installation mission.

MAJOR DEFICIENCY (MAJ.):

A problem categorized as major requires action, but not necessarily immediate attention. It has the potential to result in a notice of violation from regulatory agencies. A major deficiency may pose a threat to human health, safety or the environment.

MINOR DEFICIENCY (MIN.):

A minor deficiency is mostly administrative in nature, even though it might result in a notice of violation. It may also be a temporary or occasional instance of noncompliance.

MANAGEMENT PRACTICE (MGT.):

A management practice is not considered a deficiency because it is not based on a specific regulatory requirement. Although items noted may not be specifically covered by regulation, and are not assigned severity ratings, they still require management attention.

REGULATORY COMPLIANCE TABLE
for
TULLY LAKE

COMPLIANCE CATEGORY	FINDINGS			
	SIG.	MAJ.	MIN.	MGT.
Air Emissions			1	1
Cultural and Historic Resources Management			1	
Hazardous Material Management		1	5	3
Hazardous Waste Management			1	3
Natural Resources Management			7	1
Pesticide Management			1	
Petroleum Oil and Lubricant (POL) Management				2
Solid Waste Management			5	1
Special Pollutants Management (Radon, Asbestos, PCB's, Noise)			2	2
Underground Storage Tanks (UST) Management				
Wastewater Management				
Water Quality Management			2	
Totals	0	1	25	13

AIR EMISSIONS MANAGEMENT

FINDING: Minor Deficiency

CONDITION: Corps owned vehicles have not been inspected for air pollutant emissions.

CRITERIA: State of Massachusetts regulations (310 CMR 7.20) require yearly testing of motor vehicles for hydrocarbons and carbon monoxide emissions. Section 118 of the federal Clean Air Act and ER 56-2-1 requires full federal compliance with state and local air quality regulations.

EFFECT: Unlawful levels of air pollutants may be released from project vehicles.

SOLUTION: Corps vehicles should be inspected yearly for emissions and necessary measures taken to correct any deficiencies.

FINDING: Management Practice

CONDITION: It is unknown if air conditioners in Corps owned vehicles are serviced at facilities which properly recycle refrigerant containing chlorofluorocarbons.

CRITERIA: The 1990 Clean Air Act requires all persons servicing motor vehicle air conditioners to properly use approved CFC recycling equipment by 1 January 1993.

EFFECT: CFC's could be released from Corps owned vehicles during servicing. CFC's contribute to atmospheric ozone depletion and such releases should be avoided.

SOLUTION: Project Manager should assure that air conditioners in Corps vehicles are serviced at only facilities which properly recycle CFC's.

CULTURAL AND HISTORIC RESOURCES MANAGEMENT

FINDING: Minor Deficiency

CONDITION: Project lacks an adequate cultural resources inventory. The existing inventory does not adequately survey the project for prehistoric sites or properly assess the significance of known sites.

CRITERIA: Corps facilities are required to locate, inventory, and nominate all properties that appear to qualify for listing on the National Register of Historic Places (16 USC 470, 36 CFR 800, ER 1130-2-438).

EFFECT: 1) Project is not in compliance with Section 106 of the National Historic Preservation Act.
2) Cultural resources may be at risk.

SOLUTION: Program funding to upgrade the existing cultural resources inventory and update the Historic Properties Management Plan.

HAZARDOUS MATERIAL MANAGEMENT

FINDING: Management Practice

CONDITION: Relevant regulations, directives and guidance documents on hazardous materials are not maintained at the project.

CRITERIA: The following documents shall be maintained and kept current at the dam:

29 CFR 1910, Occupational Safety and Health Standards

40 CFR 302, Reportable Quantities of Hazardous Materials (Table 302.4)

49 CFR 172, 173, 178 and 179, Research and Special Programs Administration.

NFPA, Fire Protection Guide of Hazardous Materials.

ER 500-1-1, Natural Disaster Procedures Ch.1.

EM 385-1-1, Safety and Health Requirements Manual.

SOLUTION: 1) Project Operations will obtain copies of relevant regulations and distribute to Tully Lake.
2) Project Manager will assure that regulations are reviewed periodically and kept current.

COMMENT: With incomplete or outdated regulatory file, project personnel may be unaware of proper hazardous materials management practices which may result in regulatory violations an/or environmental harm.

FINDING: Minor Deficiency

CONDITION: Facility does not have a written Oil and Hazardous Substance Contingency Plan for spill events.

CRITERIA: The Contingency Plans should contain the following: Hazardous Substance Storage area, Designated individual to initiate spill response, periodic drills, schedule emergency equipment list, emergency medical procedures, key phone numbers, decontamination procedures. (ER 1130-2-434)

EFFECT: Lack of or unfamiliarity with plan can result in inappropriate or delayed emergency response exacerbating damage or injury.

SOLUTION: Emergency Operations Center is developing Oil and Hazardous Substance contingency Plan for spill events. Plan will be distributed to Tully Lake when complete.

COMMENT: Draft information on spill contingency plans was prepared and submitted to Project Operations in January 1988.

FINDING: Management Practice

CONDITION: 1) Facility has not coordinated with local fire department concerning types of hazardous chemicals used at the facility, the areas where they are used, what they are used for, and quantities in a given operation.
2) Coordination with local fire department was accomplished for underground storage tanks in 1988 and again in 1991.

CRITERIA: Review coordination efforts with local fire department determine whether the department is aware of areas that are at high risk for chemical incidents.

EFFECT: Chemicals reacting to heat or flame could pose a serious threat to fire fighting personnel aware of their presence or location.

SOLUTION: Facility staff should initiate coordination efforts with the fire department.

FINDING: Minor Deficiency

CONDITION: Facility does not have a MSDS for each hazardous chemical stored and used at the facility.

CRITERIA: MSDS must be on file and readily accessible to workers for each hazardous material stored or used. (40 CFR 1910.1200(g)(1) 910.1200(g)(8))

EFFECT: In the absence of MSDS project personnel may be unaware of hazards associated with certain chemicals or unable to take appropriate emergency action.

SOLUTION: Division office is in process of reviewing chemical list provided by the facility. MSDS sheets will be obtained for all hazardous chemicals listed.

FINDING: Minor Deficiency

CONDITION: Inside flammable/ combustible storage room does not meet certain specifications. (Photo 1 & 2)

CRITERIA: Storage facilities should meet the following criteria:
1) Fire resistant walls, sill or ramp separating adjacent rooms
2) Liquid tight floor/wall joints
3) Self closing fire doors
4) NEPA approved electrical wiring
5) Suitable capacity exhaust system
6) Clear isles. (29 CFR 1910.106 (d)(4))

EFFECT: Without sill spills could migrate to basement drain and subsequently into the soil. Poor ventilation in the paint room creates an unhealthful environment.

SOLUTION: Provide adequate ventilation system and construct sill at doorway to confine spills.

FINDING: Minor Deficiency

CONDITION: Hazardous materials were found stored in many locations. While storage areas are designated as storage areas at Tully Lake, these other areas have not all been documented as legitimate storage areas. (Photo 3,4,5,6,7,8 & 22)

CRITERIA: A master listing of all hazardous materials storage sites should be maintained at the facility and at the Division Office.

SOLUTION: 1) Move all materials to designated storage area and set up a policy listing that all materials will be stored in them.
2) Reduce the amount of materials stored so that they can all fit into existing storage.

FINDING: Management Practice
CONDITION: A periodic drill or contingency demonstration has not been conducted as part of the emergency response spill plan.
CRITERIA: Facilities must have a written Oil and Hazardous Material Substance Contingency Plan for spill events.
SOLUTION: Set up a mock situation and run through a drill or demonstration.

FINDING: Minor Deficiency
CONDITION: Fire extinguisher and signs are not properly provided.
29 CFR 1910.106 (d)(7)
CRITERIA: Areas where flammable/combustibles are stored (both inside the utility building in the paint locker and at the storage building) must meet certain fire protection standards.
SOLUTION: Locate a 12B rated fire extinguisher outside door openings not to exceed 10 ft away. Place "No open flame spark within 50 ft" sign.

FINDING: Major Deficiency
CONDITION: Materials were found leaking in the storage area.
Housekeeping of hazardous material storage containers was poor.
29 CFR 1910.(e)(z), DoD 4145.19-R-1 (Photo 10,11,12,13 & 14)
CRITERIA: Incidental storage of flammable/combustible liquids in industrial areas must conform to certain requirements and certain storage and handling criteria are to be observed.
SOLUTION: Review and improve material handling and storage procedures and follow good housekeeping standards.

HAZARDOUS WASTE MANAGEMENT

FINDING: Management Practice

CONDITION: Project lacks a contingency plan for responding to discovery of potential HTW contaminated sites.

CRITERIA: A contingency plan outlining steps to follow upon discovery of potential HTW contaminated sites should be in place.

EFFECT: If proper steps are not taken to investigate potential HTW sites, project personnel or the public could be unnecessarily exposed to hazardous/toxic wastes.

SOLUTION: A contingency plan for investigating potential HTW contaminated sites should be developed. Project manager should have training necessary to implement the plan (i.e. the EPA 40 hour Hazardous Materials Incident Response course taught in accordance with 29 CFR 1910.120).

FINDING: Potential Minor Deficiency

CONDITION: A 55 gallon drum present in a materials storage area near the dam spillway appears to be full or partially full. Contents are unknown, but may be rainfall that has leaked into the drum over time (project manager believes that all drums were empty when brought to site). The drum is labeled as containing freon. (Photo 7,19, also Photo's 18,20, & 21)

CRITERIA: Hazardous wastes should be properly stored, handled, and disposed of (40 CFR 262, 310 CMR 30).

EFFECT: The drum may contain hazardous substances and pose a risk to the environment and human health.

SOLUTION: Contents of the drum should be tested and properly disposed of.

FINDING: Management Practice

CONDITION: Not all hazardous waste containers were properly labeled or stored in designated area. (Photo 3,4, 5,6,7, & 8)

CRITERIA: Separate covered nonflammable/nonreactive labeled containers shall be provided for the collection of garbage, oils, flammable and hazardous wastes. Containers shall be stored in appropriate, designated storage areas. (EM 385-1-1;11.V.07)

EFFECT: Non-labeled wastes can not easily be identified, especially after staff turnover. This may lead to incorrect storage and handling practices and may require costly testing prior to disposal. Wastes not stored in designated area are more prone to accidental spillage and introduction to the environment. Waste inventory determination becomes more difficult.

SOLUTION: All hazardous wastes containers shall be properly labeled and stored.

FINDING: Management Practice

CONDITION: In the past, the hazardous waste storage building was being utilized as a collection and storage point for hazardous waste products imported from other projects/facilities. Tully Lake is not properly permitted as a collection and storage facility for hazardous waste products. (Photo 10)

CRITERIA:

- 1) Facilities are required to abide by state and local regulations. ER 200-2-2 para. 20
- 2) Tully Lake's EPA Very Small Quantity Generator license ID #MA2960009817 (20 July 1987) does not authorize the importation or hazardous wastes from other projects/facilities.

SOLUTION: In the future, operate the facility in accordance with the EPA license conditions

COMMENTS: Tully Lake is no longer being used as a collection point for hazardous waste from other LCRB and NED Projects.

NATURAL RESOURCES MANAGEMENT

FINDING: Minor Deficiency

CONDITION 1: Master Plan for Tully Lake is dated and approved September 1976. Plan is outdated and does not reflect current development of natural or man-made resources at this project.

CRITERIA: ER 1130-2-435 section (10)(a) requires scheduling of revision of master plans within 5 years of date of the regulation, 30 December 1987.

EFFECT: Operational Management Plans (OMP's) developed in accordance with and for the purpose or implementing the outdated Master Plan will be equally outdated.

SOLUTION: Program resources to update Master Plan within next 5 years.

CONDITION 2: The Fish and Wildlife Management Plan is outdated and does not emphasize the maintenance and restoration of habitat favorable to the production of indigenous fish and wildlife.

CRITERIA: Fish and wildlife plans must address the management of all indigenous species and be based upon the following:

- inventory of fish and game species
- inventory of endangered, threatened and other special interest plant or animal species
- survey of non-game wildlife other than endangered species

Verify that fishing, hunting and trapping are authorized and controlled in conformance with Federal and state laws, local regulations and approved management plans (ER 1105-2-50, para. 2-1).

SOLUTION: Update the current Fish and Wildlife Management plan to include and emphasize items mentioned above.

CONDITION 3: The Forest Management Plan is outdated and does not adequately address the provisions for sustained production of timber and/or be compatible with multiple use resource management objectives.
CRITERIA: The Forest Management Plan must be current and include the following: (ER 1130-20400 para. 11(1)).

- volume inventories and conducted and kept current
- small volume (including firewood) sales are in accordance with regulations
- harvesting and treatment
- sustain yield
- improve vegetation conditions
- control pests
- improve watersheds
- improve wildlife habitat
- complement natural beauty values

SOLUTION: The Forest Plan needs to be revised and updated to include provisions to address the resource management objectives listed above.

FINDING: Minor Deficiency

CONDITION: Project OMP (Operational Management Plan) has not been developed in coordination with the planning, real estate and safety element of the project.

CRITERIA: All Corps facilities are required to develop and maintain a project operational management plan (OMP). (ER 1130-2-400 para.6 and para.9 through 11 Appendix B.)

- SOLUTION:
- 1) Develop an OMP in accordance with ER 1130-2-400 and assure that it addresses all operational projects in the Master Plan (ER 1130-2-435).
 - 2) Verify that the OMP has been approved by the Division Commander.
 - 3) Verify that the OMP is updated as required and when funds are available.

FINDING: Minor Deficiency

CONDITION: Wetlands at the project have not been identified and protected.

CRITERIA: Wetlands should be identified and protected. All activities in the floodplains are to be conducted in accordance with state and federal regulations.

SOLUTION: Wetlands at Tully Lake should be delineated.

FINDING: Minor Deficiency

CONDITION: A field survey to determine if any Federally threatened or endangered species or state listed species of special concern occur in the project area is lacking. Without such a survey, the possibility that normal project operations any harm Federal or state listed species cannot be ruled out.

CRITERIA: The Federal Endangered Species Act (16 USC 1536) prohibits actions which jeopardize the continued existence of threatened or endangered species, or destroy or adversely affect critical habitat of such species. Similar protection is provided by the Connecticut Endangered Species Act (Public Act No. 89-224, Section 9).

SOLUTION: Program funds to conduct a survey of project area to determine if any rare threatened and endangered species are present at the project. If any are found, management plans to protect existing populations should be developed and implemented.

FINDING: Minor Deficiency

CONDITION: The existing Environmental Assessment/FONSI for operation and maintenance activities at Tully Lake was written in 1977 and does not accurately address current conditions at the project or project impacts.

CRITERIA: An up to date Environmental Assessment describing existing project conditions and impacts of project operation on natural and cultural resources should be available.

SOLUTION: Update Environmental Assessment/FONSI.

FINDING: Minor Deficiency

CONDITION: Erosion is occurring along portions of Tully Lake shoreline. No survey of shoreline erosion is available and no measures have been taken to control the erosion.

CRITERIA: Measures shall be provided to control erosion damage to land (ER 1130-2-400 and EM 1110-1-400).

SOLUTION: Survey reservoir shoreline for erosion, and develop and implement a shoreline erosion control plan. Strong consideration should be given to using innovative, low cost, biotechnical shoreline erosion control techniques such as those developed at WES. Planting emergent vegetation may be appropriate to control minor shoreline erosion occurring at the Tully Lake campground.

FINDING: Minor Deficiency

CONDITION: Tully Lake levels were held at a higher than normal levels for several months during the summer of 1985 as part of a drought contingency storage plan study. Numerous trees were killed as a result. An Environmental Assessment was not prepared prior to this action, and no coordination with state and federal resource agencies apparently took place. Potential impacts on threatened and endangered species were not considered (note: the dwarf cow lily, a state listed threatened species may occur in Long Pond and could have been adversely affected by this action).

CRITERIA: Corps of Engineers NEPA regulations (33 CFR 230) recommend preparation of an Environmental Assessment prior to changes in pool level operations. Fish and Wildlife Coordination Act requires consultation with federal and state resources agencies on all water resource projects.

SOLUTION: Future changes in reservoir operation for drought contingency storage or any other reason should not be made without completion of Environmental Assessment and coordination with state and federal resource agencies.

FINDING: Management Practice

CONDITION: Long Pond appears to provide good potential nesting habitat for wood ducks. Nesting boxes may of value.

CRITERIA: Measures should be taken to maintain and enhance fish and wildlife habitat at Corps projects (Fish and Wildlife Coordination Act; ER 1165-2-28).

SOLUTION: Evaluate the potential of the project area to support woods ducks and the need for nesting boxes.

COMMENT: Wood Duck boxes have been placed along the more remote areas of the Tully Lake shoreline.

PESTICIDES MANAGEMENT

FINDING: Minor Deficiency

CONDITION: Project has not developed a Pest Management Program (PMP) and is not fully participating in the Division PMP.

CRITERIA:

- 1) Each Division will implement a Pest Management Program. (ER 1130-2-413, para. 6.a.(2))
- 2) The Division Commander must designate a trained single point of contact for management of the Division pest control program.
- 3) The Division Office must maintain a current listing of suspended, canceled and restricted use pesticides.

SOLUTION:

- 1) Designate a trained single point of contact for management of the PMP in the Natural Resource Management Branch.
- 2) POC should develop and keep current a list of suspended, canceled and restricted use pesticides.
- 3) POC will review and approve all Pest Management plans, contracts, purchase orders, etc.

PETROLEUM OIL LUBRICANT (POL) MANAGEMENT

FINDING: Management Practice

CONDITION: The facility does not have access to a current file of applicable Federal, Corps, and state POL regulations.

CRITERIA: The following regulations should be maintained and kept current at the facility: 29 CFR 1910, 33 CFR 153, 40 CFR 110, 112, 40 CFR 266, EM 385-1-1, EP 415-1-261, ER 500-1-1, appropriate state and local regulations.

EFFECT: Lack of or incomplete regulatory files may result in poor POL Management practices.

SOLUTION: Copies of all relevant material will be distributed to the project.

FINDING: Management Practice

CONDITION: Facility has informal plan for recycling waste petroleum products, i.e., waste oil is brought to waste oil recovery facility.

CRITERIA: Management of Recoverable and Waste Liquid Petroleum Plan has been prepared and adopted by Division Engineer.

EFFECT: Formal management plan is needed to assure that all field staff are aware of good management practice.

SOLUTION: Although staff is treating recoverable waste products in accordance with GMP, no formal plan is available. Formal plan is being prepared by Division office and will be distributed to all field offices.

SOLID WASTE MANAGEMENT

FINDING: Possible Minor Deficiency

CONDITION: Numerous car mufflers and other debris have been dumped in a gravel pit that is either on, or adjacent to, fee owned land. (Photo 33 & 34)

CRITERIA: Garbage, rubbish, litter, and other debris should not be brought onto the project for dumping or disposal without permission (40 CFR 327.9(b)). Massachusetts regulations prohibit open dumping (310 CMR 19.04).

EFFECT: Violation of state regulations. Poor aesthetics.

SOLUTION: Project Manager should determine if the mufflers and other debris are present on fee owned land. If so, the material should be removed and properly disposed of at a state licensed landfill. Increase surveillance of project lands for trash, litter and other improperly disposed of debris.

COMMENT: Tully Lake is awaiting Real Estate action to verify project boundaries including resurveying if necessary.

FINDING: Minor Deficiency

CONDITION: Three paint cans containing a viscous petroleum product were found on fee owned land near the old gravel pit adjacent to Route 68.

CRITERIA: Garbage, rubbish, litter, and other debris should not be brought onto the project for dumping or disposal without permission (40 CFR 327.9(b)). Massachusetts regulations prohibit open dumping (310 CMR 19.04).

EFFECT: Minor threat to water quality, public health. Violation of state law.

SOLUTION: Clean up site.

FINDING: Management Practice

CONDITION: An old car body is present along Tully River downstream of dam (Photograph 32).

CRITERIA: Miscellaneous debris on project lands should be removed and properly disposed of.

EFFECT: The old car body is unsightly. Rusted edges pose a safety hazard.

SOLUTION: Remove and properly dispose of the car body after consultation with NED archaeologist.

FINDING: Minor Deficiency

CONDITION: Trash receptacles used in the recreation area do not have covers or handles.

CRITERIA: Trash receptacles should have functioning lids (40 CFR 243.200-1(a) and EM 385-1-1). Those designed to be emptied manually should have handles.

EFFECT: Unsanitary conditions.

SOLUTION: Provide trash receptacles that have lids and otherwise conform to above criteria.

FINDING: Minor Deficiency

CONDITION: Numerous empty 55 gallon drums, steel cable, a ca. 250 gallon aboveground fuel tank (used by project as a water tank), used fence posts and guard rails, creosote treated lumber, and other items are stored haphazardly near the project spillway (see Photograph 17,18,19,20,21,25,28,29 & 30).

CRITERIA: Excess material should be stored in an orderly manner. Items not likely to be of future use should be recycled or properly disposed of. Use of creosote treated lumber should be avoided where possible. Unneeded creosote treated lumber should be disposed of properly at a state licensed landfill. Note: Massachusetts regulations (310 CMR 16) prohibit speculative accumulation of materials unless a reasonable future use for the material can be postulated.

EFFECT: Potential Safety hazard to public (tripping). Potential exposure of project personnel and public to creosote, a known carcinogen. Area is unsightly.

SOLUTION: The need for items stored at the site should be carefully assessed. Items not likely to be of use in the future (e.g. the empty 55 gallon drums) should be recycled or properly disposed of at a state licensed landfill.

FINDING: Minor Deficiency

CONDITION: Miscellaneous debris, including asphalt and concrete rubble, and woody debris are being dumped at an open dump near the spillway (Photograph 3).

CRITERIA: Open dumping of wastes is prohibited by Massachusetts state law (310 CMR 19.014).

EFFECT: Presence of unlicensed open dump violates state laws. Dump is unsightly.

SOLUTION: The open dump should be evaluated according to Massachusetts landfill site assessment criteria. Based on results of the evaluation, the dump should either be capped or removed from the site. Any material removed from the site should be properly disposed of at a state licensed landfill. It may be possible to obtain a local burning permit for woody debris. No additional material should be disposed of at the site unless permitted by the state.

SPECIAL POLLUTANTS - RADON

FINDING: Management Practice

CONDITION: The project has had a radon survey conducted. The Basin Office basement recorded over 4pCi/L in the survey. Continued, on-going, radon measurement is underway.

CRITERIA: Levels of greater than 4pCi/L found indoors is considered dangerous. Lengthy continued exposure is especially dangerous.

SOLUTION: 1) Continue monitoring process and limit individual's time in the Basin Office basement until the hazard is cleared.
2) Less than 80 hours a year should be spent in the basement.

SPECIAL POLLUTANTS MANAGEMENT - PCB'S

FINDING:

The facility has not had a PCB spill, does not use PCB's and does not have PCB transformers, PCB storage, disposal or landfill facilities, or PCB's of any kind.

SPECIAL POLLUTANTS - ASBESTOS

FINDING: Minor Deficiency

CONDITION: An asbestos survey of Corps facilities has not been conducted. Asbestos insulation on heating pipes in the basement of the Basin Office have been identified and properly labeled. Asbestos containing material (ACM) in the exhaust system of the stand-by generator in the gatehouse has been properly sampled by the NED Environmental Lab and removed by a licensed contractor.

CRITERIA: All corps facilities are required to conduct an asbestos survey of all their facilities. (ER 200-2-2)

SOLUTION: Have an asbestos survey conducted at all Tully Lake facilities. Where asbestos containing material (ACM) is suspected, limited personal activity should take place until results of survey is completed.

COMMENT: Positive steps have been taken to remove or mitigate effects of ACM when located at Tully Lake. An asbestos survey will assure that all ACM has been located. (Photo 15)

SPECIAL POLLUTANTS - NOISE

FINDING: Management Practice

CONDITION: A log is not maintained to log complaints on noise produced by Corps of Engineer activities and Operations.

CRITERIA: A single point of contact be identified to address noise complaint. This POC shall keep a written log of complaints on noises produced by Corps of Engineer activities and operations.

SOLUTION: Establish a Noise Complaint log and identify a POC.

FINDING: Minor Deficiency

CONDITION: A noise survey has not been conducted to identify potential noise hazards and to determine adequate personnel protection. (Photo 16)

CRITERIA: Personnel shall not be exposed to 85 dB(a) or 140 dB impulse where engineering or administrative controls are not instituted. (EM 385-1-40, Occupational Health, EM 385-1-1, Safety Manual)

SOLUTION: Conduct noise survey - Institute controls where needed.
(1) Gate House Generator should be evaluated.
(2) Heavy Equipment should be evaluated.

UNDERGROUND STORAGE TANKS (UST's) MANAGEMENT

FINDING:

All UST's at Tully Lake have been recently replaced (FY-92) with tanks that meet or exceed all containment and monitoring regulations. (Photo 24)

WASTEWATER MANAGEMENT

Wastewater is disposed of in septic tanks and leaching fields. No problems have been experienced with the septic tanks or leaching fields. A single system serves both the basin office and the utility building. The septic tank was last pumped in 1980. A second system, comprised of a 6,000 gallon septic tank, siphon chamber, distribution box and leaching field, serves the campground. This septic tank was pumped out annually by the State. In addition, port-a-johns are brought in during the summer to serve the boat ramp parking and recreation area immediately above the dam; these are cleaned out weekly.

WATER QUALITY MANAGEMENT

There are two water supply wells at Tully Lake. Well TM-DW-1 is approximately 1,500 feet southwest of the basin office. It supplies the basin office and the utility building. It was drilled in 1948 to a depth of 316 feet. Reports on file in the utility building indicate that this well collapsed partially in subsequent years. In 1988, when a replacement pump was installed at depth of 200 feet, the depth of the well was reported as 252 feet. This well serves fewer than 25 people and has fewer than 15 service connections; therefore, it is not a public water supply. Although NED regularly monitors water quality at all well sites, federal and state regulations only require monitoring of public water supplies.

Well TM-DW-2, the second well, is located off Doane Hill Road at the recreational facility. The well is operated from May to September when the campground is open. Visitors' stays are limited to two weeks. This well is a public water supply because it serves more than 25 people. Furthermore, it is a transient noncommunity well as it does not serve the same population for six months or more. The Massachusetts Dept. of Environmental Management's (MA-DEM) Division of Forests and Parks operated the recreational facility from the time of completion of the project circa 1977, until the spring of 1992, when it terminated its lease. The well was installed by the Corps under a separate contract in 1976. Specification for supply contract DACW33-76-M-1764 called for drilling to an initial depth of 60 feet to obtain a minimum yield of 10 gallons per minute when pumped continuously for 8 hours daily. The drilling log is no longer on file with either Operations Directorate or the project office. In a telephone conversation June 2, 1992, Mr. Kirke Henshaw, proprietor of Henshaw Well Drilling and Pumping Systems of West Chesterfield, Massachusetts, recalled having drilled the well to a depth of 140 feet.

NED uses its Barre Falls Environmental Laboratory to collect samples and test for bacteria in drinking water samples. Sampling frequency is tied to usage. All wells are monitored at least quarterly during the months they are in operation. Monitoring for nitrates is required once per three year period. MA-DEM may require baseline sampling of organics and inorganics as part of the well registration and certification process.

FINDING: Minor Deficiency

CONDITION: The well at Tully Campground was turned over to NED from the Commonwealth of Massachusetts in 1992. In a telephone conversation May 21, 1992, Mr. Rodney Whipple of MA-DEM's Division of Forests and Parks Otter River State Forest, indicated his agency had not registered the recreational facility well with Massachusetts Department of Environmental Protection's (MA-DEP) Division of Water Supply.

CRITERIA: Under 40 CFR 142.10 (adopted under provisions of the Safe Drinking Water Act — Public Law 93-523), a State has primary enforcement responsibility for public water systems in the State including certification of laboratories. Applicable Massachusetts monitoring requirements are codified in CMR 310-22. See also MA-DEP document entitled "Guidelines and Policies for Water Systems", dated October 1991. In order to comply with federal regulation 40 CFR 142.10 and state regulation 310 CMR 22, the Corps should register the well with MA-DEP.

SOLUTION: Register well.

COMMENT: Mr. Joseph Faloretti, Basin Manager, is coordinating with Mr. Stan Szczurko of MA-DEP's Division of Water Supply, Source Approval Branch, to register the Tully Lake recreational facility well.

NOTE: The well will probably be permanently closed prior to being registered by the Corps.

FINDING: Minor Deficiency.

CONDITION: Recreation facility well was turned over to NED in spring of 1992. NED will report results after well has been registered, because proper reporting requires an EPA identification number which can only be obtained by registering the well.

CRITERIA: Prompt reporting of result of potable water monitoring is required under provisions of the Safe Drinking Water Act — Public Law 93-523.

SOLUTION: Results of routine monitoring of public water supplies should be promptly reported to the appropriate state agency by WCD or Laboratory, depending on turnaround time allowed by state regulations.

RESERVOIR WATER QUALITY PROGRAM

The NED reservoir water quality control management program at Tully Lake has multiple goals: Its primary purpose is to protect public health and safety, but additional goals include meeting State water quality standards, maintaining water quality suitable for all project purposes, and understanding the effects of project operations on water quality. NED's Water Quality Team meets as needed during the year to determine water quality needs at each project, including Tully Lake, and carry out the annual program.

Although water quality management is not a defined project purpose at any project operated and maintained by NED, the Corps has a strong interest in water quality. Executive Order 11752, "Prevention, Control, and Abatement of Environmental Pollution at Federal Facilities," 19 December 1973, makes it a stated national policy that the Federal Government, in the design, construction, management, operation, and maintenance of its facilities, shall provide leadership in the nationwide effort resources. Section 102b of the Federal Water Pollution Control Act Amendments of 1972 places responsibility with EPA for determination of the need for, the value of, and the impact of storage for water quality control in any reservoir project not in a construction status as of 18 October 1972. The responsibility for water quality at Corps projects, however, clearly rests with the Corps since it is an integral part of our water control management activities (reference ER 1130-2-334 Apr 86 and ER 1130-2-415 Oct 76).

NEW ENGLAND DIVISION
ERGO TEAM

Bruce Williams Program Manager
Operations Directorate
Project Operations and Readiness Division
Environmental Compliance Coordinator - NED
Coordinator, Radon Reduction Program - NED

Jim Law
Operations Directorate
Project Operations and Readiness Division

Mike Penko
Planning Directorate
Impact Analysis Division
Endangered Species Coordinator - NED

Townsend Barker
Engineering Directorate
Water Control Division
Chairman, NED's Water Quality Team

Vicki Volz
Engineering Directorate
Water Control Division

Jim Peck
Safety and Occupational Health Office
Safety Manager - NED

Anne Laster
Real Estate Directorate
Conveyancing Division

LTC Douglas Outlaw - TDY
EN, (IND. MOB. AUG.) New England Division
Professional Engineer I
Hazardous Waste Regulation Section
State of Florida
Department of Environmental Regulation

Appendix A

ERGO

Environmental Review Guide for Operations

PRE-ASSESSMENT ENVIRONMENTAL MANAGEMENT QUESTIONNAIRE

This questionnaire will provide background information necessary to plan and conduct an environmental compliance assessment.

Name of Facility: TULLY LAKE

QUESTION/DESCRIPTION	RESPONSE	REFERENCE
SECTION 1, Air Emissions Management:		
1. Does facility operate a fuel burner (central steam plant, or hot water or hot water steam boiler)?	<u>NO</u>	If YES see ERGO items 1-4 through 1-15.
2. Does facility operate an incinerator?	<u>NO</u>	If YES see ERGO items 1-16 through 1-18.
3. Does facility dispense, store, or transfer gasoline? THE ONLY GASOLINE STORED AT THE PROJECT IS IN VEHICLES AND 5 GALLON CONTAINERS. (STORED IN FIREPROOF ROOM)	<u>NO</u>	If YES see ERGO items 1-19 through 1-23.
4. Does facility have volatile organic compounds (VOCs) (generally, but not exclusively, found in solvents)? SMALL QUANTITIES (LESS THAN 5 GALLONS) MAY BE ON HAND IN THE FIRE PROOF ROOM.	<u>NO</u>	If YES see ERGO items 1-24 through 1-28.
5. Does facility have fugitive emissions from volatile hazardous air pollutant (VHAP) equipment?	<u>NO</u>	If YES see ERGO items 1-29 through 1-35.
6. Does facility use VOC-based solvent degreasers? WE USE SOL-VEX. IT IS A SOLVENT BASED EMULSIFIABLE DEGREASER THAT RINSES READILY WITH WATER. THE MANUFACTURER RECOMMENDED USE AS AN ENGINE DEGREASER AND PARTS CLEANER. IT IS A PETROLEUM DISTILLATE BASE PRODUCT. MANUFACTURER: METRA CHEM CORP. 792 HARTFORD PIKE SHREWSBURY, MA 01545 TEL. 617-845-1193	<u>NO</u>	If YES see ERGO item 1-36.

QUESTION/DESCRIPTION

RESPONSE REFERENCE

SECTION 2, Cultural and Historic Resources Management:

1. Does the facility have any properties under its jurisdiction?
NO SIGNIFICANT CULTURAL OR HISTORIC RESOURCES HAVE BEEN IDENTIFIED AT THE PROJECT TO DATE. IT IS LIKELY THAT SOME MAY EXIST ON THE PROJECT.

YES

If YES see ERGO items 2-4 through 2-10.

2. Does the facility have cultural resources? List the facility's cultural resources below:
NONE HAVE BEEN IDENTIFIED AT THIS TIME.

NO

If YES see ERGO items 2-11 through 2-14.

a. Are the facility's master plan or operational management plan (OMP) public documents?

THE PROJECT MASTER PLAN IS A PUBLIC DOCUMENT, OR THE OMP WILL BE WHEN COMPLETED.

YES

If YES see ERGO item 2-13.

3. Does the facility have an operational project?

YES

If YES see ERGO item 2-15.

4. Does the facility have any Native American graves or artifacts, or have any been discovered during an operation?

CULTURAL RESOURCES INVENTORY HAS NOT BEEN COMPLETED.

NO

If YES see ERGO item 2-16.

5. Does the facility have an archeological or historical collection?

NO

If YES see ERGO items 2-17 through 2-28.

QUESTION/DESCRIPTION

RESPONSE REFERENCE

SECTION 3, Hazardous Materials Management:

1. Does the facility store any hazardous materials?
NO
NO MSDS ARE ON HAND FOR HAZARDOUS MATERIALS. FACILITY INSPECTED BY SAFETY OFFICER SUMMER OF 1991
If YES see ERGO items 3-5 through 3-8.
2. Have there been any releases of hazardous substances at the facility?
NO
If YES see ERGO items 3-9 through 3-11.
3. Are there any extremely hazardous substances at the facility?
NO
If YES see ERGO item 3-12 and 3-13.
4. Does the facility: Have extremely hazardous substances in excess of 500 lbs or the threshold planning quantity (see appendix III-1); have hazardous chemicals in excess of 10,000 lbs; or fall under Standard Industrial Classification Codes 20 to 39?
NO
If YES see ERGO item 3-12 and 3-13.
5. Does the facility store compressed gases, flammable/combustibles, or acids?
YES
WELDING TANKS. FLAMMABLE LIQUIDS STORED IN FIREPROOF ROOM.
If YES see ERGO items 3-14 through 3-27.
6. Does the facility transport hazardous material, or offer such materials for transport?
YES
PACKING, MARKING AND SHIPPING IS DONE BY LICENSED CONTRACTOR.
EPA I.D. NO. (MA 29600009817)
A COPY OF THE LETTER FROM EPA TO TULLY LAKE DATED JULY 20, 1987 ENCLOSED.
If YES see ERGO items 3-28 through 3-31.

QUESTION/DESCRIPTION

RESPONSE REFERENCE

SECTION 4, Hazardous Waste Management:

1. Is facility a generator of hazardous waste?

PRINTING INK, INK SOLVENTS AND CLEANERS ARE USED AT THE PROJECT.

YES

If YES see ERGO items 4-8 through 4-15.

a. Is facility a small quantity generator?

NO

If YES see ERGO items 4-16 through 4-18.

b. Is facility a very small quantity generator?

WE ARE WITHIN THE REGULATORY REQUIREMENTS FOR A VERY SMALL QUANTITY GENERATOR. IN THE PAST FULLY RECEIVED HAZARDOUS WASTE FROM OTHER LCRB PROJECTS FOR DISPOSAL BY CONTRACTOR. ATTACHED MANIFEST, SHIPPING DOCUMENTS, ETC.
Complete this section before proceeding.

YES

If YES see ERGO item 4-19.

Any waste which is not excepted, which is listed in 40 CFR 261, or which exhibits the following characteristics is a hazardous waste:

- Ignitability (flash point <140 F)
- or Corrosivity (pH <2 or >12.5)
- or TCLP Toxicity (for As, Ba, Cd, Cr, Pb, Hg, Se, Ag, and selected pesticides.
- or Reactive. (or CN)

The following are hazardous wastes that may typically be found at a Corps facility:

	CHECK IF USED AT THIS FACILITY	Vol Gen/mo		Vol Accum	
		lb.	Kg.	lb.	Kg.
<input type="checkbox"/>	* Solvents	—	—	—	—
<input checked="" type="checkbox"/>	Liquid Paint	—	—	—	—
<input checked="" type="checkbox"/>	Paint stripper, remover, or thinner	—	—	—	—
<input type="checkbox"/>	Spray paint booth air filters	—	—	—	—
<input checked="" type="checkbox"/>	Pesticides, Insecticides, Herbicides, etc.	—	—	—	—
<input type="checkbox"/>	NBC filters and test kits	—	—	—	—
<input type="checkbox"/>	DS2 (diethylene triamine)	—	—	—	—
<input type="checkbox"/>	STB (super topical bleach)	—	—	—	—

SEE ATTACHED REPORT.

<input type="checkbox"/>	Ordnance, ammunition, explosives & residues	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	Battery acid & Caustics (in unserviceable batteries)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	Some pharmaceuticals	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	POL Tank Farm fuel system filters	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	De-icing solution	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	Printing ink, ink solvents and cleaners	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	Absorbant materials and soil contaminated with hazardous waste	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	Other _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	Other _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	Other _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	TOTAL	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

* e.g., Trichlorethane, Methylene, chloride, Tetrachloroethylene, 1,1,1 Trichloroethane, Carbon Tetrachloride, Chlorinated Fluorocarbons, Toluene, MEK, Break-free in liquid form, Mineral Spirits, Xylene

USEPA Generator Designation: Unregulated Small Qty Large Qty

QUESTION/DESCRIPTION

RESPONSE REFERENCE

2. Does facility export/import hazardous waste from/to the United States?

NO If YES see ERGO items 4-23 through 4-31.

3. Does facility transport hazardous waste?

NO If YES see ERGO items 4-32 through 4-37.

4. Does facility have a treatment, storage, or disposal facility (TSDF)?

NO If YES see ERGO items 4-38 through 4-74.

QUESTION/DESCRIPTION	RESPONSE	REFERENCE
a. Does the TSD facility receive waste from a foreign source?	<u>NO</u>	If YES see ERGO item 4-42.
b. Does facility receive waste from off-site sources? WE COMPLY WITH MANIFEST REQUIREMENTS. IN THE PAST WE RECEIVED MATERIAL FROM OTHER DAMS, PRIOR TO SHIPMENT BY LICENSED HAZARDOUS DISPOSAL COMPANIES.	<u>YES</u>	If YES see ERGO items 4-46 and 4-47.
c. Does facility handle ignitable, reactive, or incompatible wastes? WASTES ARE PROTECTED FROM SOURCES OF IGNITION. WASTE MOTOR OIL, THINNERS.	<u>YES</u>	If YES see ERGO item 4-65 and 4-67.
5. Does facility have hazardous waste containers? CONTAINERS ARE KEPT IN DESIGNATED STORAGE AREAS. CONTAINERS ARE IN GOOD CONDITION AND NOT LEAKING.	<u>YES</u>	If YES see ERGO items 4-75 through 4-86.
6. Does facility store hazardous wastes in tanks?	<u>NO</u>	If YES see ERGO items 4-87 through 4-101.
7. Does facility use surface impoundment as a means of treatment, storage, or disposal of hazardous wastes?	<u>NO</u>	If YES see ERGO items 4-102 through 4-110.
8. Does facility have waste piles?	<u>NO</u>	If YES see ERGO items 4-111 through 4-118.
9. Does facility have land treatment of hazardous waste?	<u>NO</u>	If YES see ERGO items 4-119 through 4-126.
10. Does facility have hazardous waste in landfills? WE HAVE A STORAGE AREA/DUMP NEAR THE SPILLWAY. SEE ATTACHED MAP.	<u>YES</u>	If YES see ERGO items 4-127 through 4-137.

QUESTION/DESCRIPTION

RESPONSE REFERENCE

11. Does facility incinerate hazardous waste?

NO

If YES see ERGO items 4-138 through 4-147.

12. Does facility dispose of hazardous waste in miscellaneous units?

NO

If YES see ERGO items 4-148 and 4-149.

13. Does facility have thermal treatment facilities?

NO

If YES see ERGO items 4-150 through 4-152.

14. Does facility have chemical, physical, or biological treatment facilities?

NO

If YES see ERGO items 4-153 through 4-155.

15. Does facility have restricted wastes?

NO

If YES see ERGO items 4-156 through 4-168.

SECTION 5, Natural Resources Management:

1. Does facility have any construction projects?

DMP IS UNDER DEVELOPMENT AND MASTER PLAN REQUIRES UPDATE.

NO

If YES see ERGO item 5-4.

2. Does facility have land management responsibilities?

EROSION IS NOT A PROBLEM WITH THE EXCEPTION OF THE ISLANDS.

YES

If YES see ERGO items 5-7 and 5-8.

3. Does facility have floodplains or wetlands?

FLOODPLAINS & WETLANDS HAVE BEEN IDENTIFIED. MAPS ENCLOSED.

YES

If YES see ERGO item 5-9.

4. Does facility contain a shoreline?

NO

If YES see ERGO item 5-12.

QUESTION/DESCRIPTION

RESPONSE

REFERENCE

5. Does facility have endangered or threatened species?

THE PROJECT DOES NOT HAVE A SPECIFIC
ENDANGERED SPECIES INVENTORY. TRANSIENT BALD
EAGLES HAVE BEEN SIGHTED ON SEVERAL OCCASIONS.
THE TINY COW LILY IS ALSO PRESENT IN LONG POND.
OTHER THREATENED SPECIES MAY ALSO BE PRESENT.
SECTION 6, Pesticides Management:

YES

If YES see
ERGO items 5-
13 and 5-14.

1. Do facility personnel engage in the application of pesticides?

NO

If YES see
ERGO items 6-7
through 6-16.

2. Does facility store, mix, or formulate pesticides?

WE STORE SMALL AMOUNTS OF INSECT
REPELLANT AND WASP STOPPER.
SEE ATTACHED HAZARDOUS MATERIALS INVENTORY SHEET.

YES

If YES see
ERGO items 6-
17 through 6-28.

a. Does facility store/use pesticides classified highly toxic or
moderately toxic (bearing DANGER, POISON, WARNING, or the skull and
crossbones symbol)?

SAME AS 2 - SEE ATTACHED HAZARDOUS
MATERIALS INVENTORY SHEET

YES

If YES see
ERGO items 6-
20 through 6-27.

3. Does facility dispose of pesticides?

NO

If YES see
ERGO items 6-
29 through 6-33.

QUESTION/DESCRIPTION

RESPONSE

REFERENCE

SECTION 7, Petroleum, Oil and Lubricant (POL) Management:

1. Does the facility store, transport, or dispense petroleum products?

WE STORE 5 GALLON CANS OF GASOLINE AND DIESEL FOR UTILITIES.

NO

If YES see ERGO items 7-5 through 7-12.

2. Have there been any discharges of oil at the facility?

NO

If YES see ERGO items 7-13 through 7-14.

3. Does the facility have any bulk storage tanks over 660 gallons?

THE LARGEST TANKS ON THE FACILITY ARE 550 GALLON #2 FUEL OIL TANKS FOR HEATING BUILDINGS.

NO

If YES, see ERGO item 7-16.

4. Does the facility use dikes as a means of containment for petroleum storage tanks?

NO

If YES see ERGO items 7-17 and 7-18.

5. Does the facility have any pipelines?

YES. UNDERGROUND PIPES ARE USED TO TRANSFER FUEL FROM UNDERGROUND TANKS TO FURNACES AT UTILITY BUILDING AND GATE HOUSE. TANKS HAVE CATHODIC PROTECTION AND TANKS ARE DOUBLE WALLED TO CONTAIN LEAKS

YES

If YES see ERGO items 7-20 through 7-22.

6. Does the facility sell used oil?

NO

If YES, see ERGO item 7-23.

SECTION 8, Solid Waste Management:

1. Does the facility collect or store solid waste on site?

SOLID WASTE IS STORED IN A CLOSED DUMPSTER. CONTRACT # DACW3391M0411. RENEWABLE WEEKLY PICK UP.

YES

If YES, see ERGO items 8-4 through 8-12.

2. All Corps facilities must should recycle and reduce solid waste.

WE RECYCLE HIGH GRADE PAPER.

YES

See ERGO item 8-13.

QUESTION/DESCRIPTION	RESPONSE	REFERENCE
a. Does facility have over 100 office workers?	<u>NO</u>	If YES see ERGO item 8-14.
b. Do more than 500 families reside at the facility?	<u>NO</u>	If YES see ERGO item 8-15.
c. Does the facility generate waste corrugated containers?	<u>NO</u>	If YES see ERGO item 8-16.
3. Does facility have land disposal on site? WE HAVE A STORAGE AREA NEAR THE SPILLWAY. MAP ENCLOSED.	<u>YES</u>	If YES see ERGO items 8-17 through 8-31.
a. Does facility dispose of water treatment plant sludges?	<u>NO</u>	If YES see ERGO 8-18.
b. Does facility dispose of incinerator or air pollution control residues?	<u>NO</u>	If YES see ERGO item 8-19.
c. Does the facility accept special wastes?	<u>NO</u>	If YES see ERGO item 8-21.
4. Does the facility have a closure site?	<u>NO</u>	If YES, see ERGO items 8-32 and 8-33.
5. Does the facility have a new landfill site?	<u>NO</u>	If YES, see ERGO items 8-34 and 8-35.
6. Does facility have a thermal processing facility?	<u>NO</u>	If YES see ERGO items 8-36 through 8-49.

QUESTION/DESCRIPTION

RESPONSE

REFERENCE

7. Does the facility utilize resource recovery facilities?

NO

If YES see ERGO items 8-50 and 8-51.

a. If the facility does NOT utilize resource recovery facilities, a report must be filed with the Administrator explaining the decision not to utilize.

WE ARE NOT LARGE ENOUGH, NOR DO WE GENERATE ENOUGH SOLID WASTE TO USE RESOURCE RECOVERY FACILITIES.

NO

See ERGO item 8-50.

SECTION 9, Special Pollutants Management:

1. Does facility have PCBs of any kind?

NO

If YES, see ERGO items 9-4 through 9-11.

a. Does facility have a PCB waste landfill?

NO

If YES, see ERGO item 9-10.

b. Does facility have PCB storage or disposal facilities?

NO

If YES, see ERGO item 9-11.

2. Does facility have PCB transformers?

NO

If YES, see ERGO items 9-12 through 9-18.

3. Has facility had a PCB spill?

NO

If YES see ERGO item 9-19.

4. Does facility have PCB Items (PCB-contaminated heat transfer or hydraulic systems, electromagnets, switches, voltage regulators, capacitors, circuit breakers, reclosers, or cables)?

NO

If YES see ERGO items 9-20 through 9-23.

5. Does facility use PCBs in research?

NO

If YES see ERGO item 9-24.

QUESTION/DESCRIPTION	RESPONSE	REFERENCE
6. Does facility store PCBs?	<u>NO</u>	If YES see ERGO items 9-25 through 9-29.
7. Does facility transport PCBs or PCB Items?	<u>NO</u>	If YES see ERGO items 9-30 and 9-31.
8. Does facility dispose of PCBs or PCB Items?	<u>NO</u>	If YES see ERGO items 9-32 through 9-41.
9. Does facility demolish, renovate, or strip components from structures containing friable asbestos?	<u>NO</u>	If YES see ERGO items 9-42 through 9-52.
10. Does facility dispose, or transport for disposal, asbestos or asbestos-containing waste? <i>IN THE PAST WE HAVE STORED ASBESTOS AND DISPOSED OF IT PROPERLY. DOCUMENTATION ENCLOSED.</i>	<u>YES</u>	If YES see ERGO items 9-53 through 9-57.
11. Is facility located in an area with a potential radon problem? <i>AN INITIAL TEST READING OF 6. PC/LITER FOR RADON WAS RECORDED IN 1989-1990 IN THE BASIN OFFICE BASEMENT. FOLLOW UP MONITORING IS CURRENTLY BEING CONDUCTED.</i>	<u>YES</u>	If YES see ERGO items 9-58 through 9-60.
12. Does facility have any possible sources of noise pollution, or have a noise hazardous area?	<u>NO</u>	If YES see ERGO items 9-61 through 9-68.
SECTION 10, Underground Storage Tanks (USTs) Management:		
1. Does facility have organizational fuel tanks?	<u>NO</u>	If YES see ERGO item 10-5.
2. Has facility repaired, or is it planning to repair, a UST?	<u>NO</u>	If YES see ERGO item 10-10.

QUESTION/DESCRIPTION	RESPONSE	REFERENCE
3. Does facility have hazardous waste USTs?	<u>NO</u>	If YES see ERGO item 10-19.
4. Does facility have a deferred UST?	<u>NO</u>	If YES see ERGO item 10-20.
5. Does facility have a metallic UST? DOUBLED WALL TANKS WITH LEAK MONITORING SYSTEM. DESCRIPTION ENCLOSED.	<u>YES</u>	If YES see ERGO items 10-23 and 10-35.
6. Does facility have newly-installed USTs (i.e., after May, 1986)? DOCUMENTATION ENCLOSED.	<u>YES</u>	If YES see ERGO items 10-24 through 10-27.
7. Have facility USTs undergone a change of service, or closure?	<u>NO</u>	If YES see ERGO items 10-28 through 10-34.
8. Does facility have substandard USTs?	<u>NO</u>	If YES see ERGO item 10-35.
SECTION 11, Wastewater Management:		
1. Does facility have a floating plant?	<u>NO</u>	If YES see ERGO item 11-4.
2. Does facility have any point source discharges, or does facility have domestic sewage treatment plants?	<u>NO</u>	If YES see ERGO items 11-5 through 11-8.

QUESTION/DESCRIPTION

RESPONSE REFERENCE

3. Does facility have storm water discharge not covered by a NPDES permit?

NO

If YES see ERGO item 11-9.

4. Does facility discharge to a privately-owned treatment works (POTW)?

NO

If YES see ERGO items 11-10 through 11-12.

5. Does facility have any personnel engaged in the operation of water pollution control devices?

NO

If YES see ERGO item 11-13.

6. Does facility have a wastewater treatment plant?

NO

If YES see ERGO items 11-14 and 11-15.

7. Does facility have electroplating operations?

NO

If YES see ERGO item 11-16 through 11-27.

8. Does facility conduct or issue permits for dredging operations?

NO

If YES see ERGO items 11-28 through 11-35.

SECTION 12, Water Quality Management:

1. Does facility perform contaminant monitoring on its water supply?

TESTS FOR TOTAL COLIFORM 4 TIMES / YEAR.
3 YEAR TEST
NITRATES, SODIUM

TURBIDITY TESTED ON OCCASION. NO STANDARDS FOR NON CHLORINATED WELLS.

YES

If YES see ERGO items 12-18 through 12-43.

2. Is facility located near a sole source aquifer?

NO

If YES see ERGO item 12-44.

QUESTION/DESCRIPTION

RESPONSE REFERENCE

3. Does facility use surface water or ground water under the influence of surface water for drinking water?

NO

If YES see ERGO items 12-45 through 48.

4. Does facility have recreational potable water sources?

CAMPGROUND HAS POTABLE WATER SOURCE. TESTING HAS PREVIOUSLY BEEN CONDUCTED BY STATE OF MASS. OTTER RIVER STATE FOREST.

YES

If YES see ERGO item 12-49.

5. Does facility have swimming beaches?

NO

If YES see ERGO item 12-50.

6. Does facility have swimming pools?

NO

If YES see ERGO item 12-51.

7. Do facility's waters support watercraft?

ONLY SMALL BOATS (CANOES, ROWBOATS, SAILBOATS, POWERBOATS WITH ≤ 10 H.P. MOTORS) ARE PERMITTED ON FACILITY'S WATER. TITLE 36 CFR IS POSTED AND CORPS RANGERS PATROL.

YES

If YES see ERGO items 12-52.

8. Is facility authorized to provide emergency drinking water?

NO

If YES see ERGO item 12-53.

Signature of individual completing this form:

Martin J. Curran

Date completed:

4/22/92

Appendix B

12 June 1992

MEMORANDUM FOR NED Executive Staff

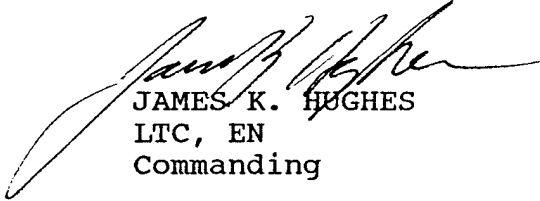
SUBJECT: NED Environmental Compliance Coordinator

1. In January 1991, John Elmore, Chief, Operations, Construction and Readiness Division, directed division and district operations offices to formally designate Environmental Compliance Coordinators (ECC's). The Director of Operations designated Bruce Williams, Project Operations and Readiness Division as the New England Division ECC.

2. In a follow-up memo dated 31 March 1992, The Director of Civil Works expanded the role of the Environmental Compliance Coordinators to be utilized as division or district environmental coordinators. This is a coordination, as opposed to an operative assignment. The ECC's will support rather than assume environmental compliance responsibilities of the various functional elements (Planning, Engineering, Project Program Management, Logistics, Safety and Occupational Health, and Real Estate, etc.).

3. The Corps of Engineer objective is to develop and maintain a comprehensive and consistent environmental compliance program utilizing the existing Operations "stovepipe", since Operations is responsible for the majority of Corps facilities. In the future, the ECC should be included in the review process of programs or projects that involve environmental compliance as part of the construction, operation or maintenance activities at Corps owned or operated facilities and projects.

4. As a part of the USACE Facilities Environmental Compliance Program, the Director of Civil Works recommended that Commanders should also establish and chair an interdisciplinary Environmental Compliance Steering Committee with representatives from the various affected offices throughout NED. Rather than develop parallel organizations performing the same function, I am tasking the NED Executive Staff to serve an additional function as the Environmental Compliance Steering Committee. The Director of Operations will provide direction and oversight to the ECC and overall coordination with NED Executive Staff.



JAMES K. HUGHES
LTC, EN
Commanding

cf:
Distribution "A"
Bruce Williams ECC



DEPARTMENT OF THE ARMY

U.S. Army Corps of Engineers
WASHINGTON, D.C. 20314-1000

REPLY TO
ATTENTION OF:

2 MAR 1992

S: 31 March 1992

CECW-OA

**MEMORANDUM FOR COMMANDERS, ALL MAJOR SUBORDINATE COMMANDS,
DISTRICT COMMANDS, AND LABORATORIES**

SUBJECT: USACE Facilities Environmental Compliance

1. In June 1991, Lieutenant General H. J. Hatch, Chief of Engineers, assigned me the mission of assuring that all USACE facilities and associated lands meet environmental standards contained in relevant Federal, DoD, Army, state, and local laws and regulations. In an effort to ensure USACE facilities environmental compliance, commanders are directed to initiate an environmental assessment/deficiency correction program for all Corps property utilizing the Environmental Review Guide for Operations (ERGO). Our overall goal is to complete environmental assessments and develop corrective action plans at all Corps projects and facilities by the end of FY94.

2. ERGO is a checklist of environmental laws and regulations, good management practices, and risk management issues. ERGO was designed as a self assessment tool, but can also be used for formal, or external assessments. Project and facility managers, with technical assistance from district elements, state authorities or private sector contractors, can use ERGO to determine if their operations are being conducted in accordance with environmental laws and regulations. ERGO assessments are a proactive approach to environmental compliance and protection. Findings identified in ERGO assessments should be prioritized and remediation measures performed as routine maintenance work or programmed in the budget process.

3. Civil Works Operations elements are already implementing ERGO, with a goal of completing ERGO assessments at 25 percent of Corps O&M General funded operating projects and facilities this FY. I now ask that you schedule and conduct ERGO assessments at facilities and projects operated with other than O&M General funds (e.g. Mississippi River and Tributaries funded projects, district motor pools, regional warehouses, Corps operated printing plants and photo labs, etc.).

4. ERGO was initially developed for use at operating projects. Since we are now expanding its application, you may find that some refinement is required to thoroughly assess facilities not considered when preparing the current manual. Contact Dr. Diane Mann of CERL-ENM at (217) 373-6741, for help in dealing with facilities and regulations not currently covered in the manual.

CECW-ON

SUBJECT: USACE Facilities Environmental Compliance

... MAR 1992

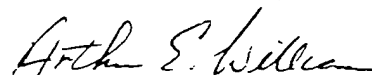
Recommendations for improving the checklist can be directed to Dr. Mann at Department of the Army, Construction Engineering Research Laboratory, Corps of Engineers, P.O. Box 9005, Champaign, Illinois 61826-9005. From efficiency and comparative standpoints we are committed to using a single environmental compliance protocol throughout USACE.

5. I encourage all elements to take a teamwork approach, using existing expertise, rather than developing parallel organizations performing the same function, to initiate, develop, and maintain environmental compliance and assurance at all USACE operated and funded projects, facilities, and activities. This teamwork approach will minimize duplicating effort and assessment costs. Commanders, if they have not already done so, should also establish and chair an interdisciplinary Environmental Compliance Steering Committee with representatives from the various affected offices throughout your organization. The steering committee will provide direction and oversight.

6. In January 1991, John Elmore, Chief, Operations, Construction and Readiness Division, directed division and district operations offices to formally designate Environmental Compliance Coordinators (ECCs). Hereafter, these coordinators will be utilized as division or district environmental compliance coordinators. This is a coordination, as opposed to an operative, assignment. The ECCs will support rather than assume environmental compliance responsibilities of the various functional elements (Planning, Engineering, Project Program Management, Logistics, Safety and Occupation Health, and Real Estate). Our objective is to develop and maintain a comprehensive and consistent environmental compliance program, utilizing the existing Operations "stovepipe", since Operations is responsible for the majority of USACE facilities.

7. We will distribute revised ERGO manuals and follow on compliance materials to each currently designated division and district ECC for dissemination to offices involved in environmental compliance throughout your organization. If there are any updates to the current list of ECCs, please forward their name, office symbol, FTS and commercial telephone numbers, Fax number, and Corps Mail I.D. to CECW-OA, ATTN: Jim Wolcott, by 31 March 1992. Field Operating Activities and Laboratories should also designate and provide information on ECCs.

FOR THE COMMANDER:



ARTHUR E. WILLIAMS
Major General, USA
Director of Civil Works



DEPARTMENT OF THE ARMY

U.S. Army Corps of Engineers
WASHINGTON, D.C. 20314-1000

08 NOV 1991

REPLY TO
ATTENTION OF:

CECW-ON (1130-2-2)

MEMORANDUM FOR COMMANDERS, ALL MAJOR SUBORDINATE COMMANDS,
DISTRICT COMMANDS, FIELD OPERATING ACTIVITIES
AND LABORATORIES

SUBJECT: USACE Facilities Environmental Compliance Program
(Internal)

1. I recently reassigned the mission of assuring that all USACE facilities and associated lands meet environmental standards contained in relevant Federal, DoD, Army, state, and local laws and regulations to the Director of Civil Works. This action is in response to your comments regarding implementing an environmental compliance initiative within USACE.

2. Program oversight will be provided by a steering committee chaired by the Deputy Director of Civil Works, with Logistics, Military Programs, Office of Counsel, Real Estate, Research and Development, Safety and Occupational Health and the U.S. Army Toxic and Hazardous Materials Agency (USATHAMA) represented. An Environmental Compliance Branch within Operations, Construction and Readiness Division will develop, coordinate, and manage the program. Civil Works will provide further details as the USACE Facilities Environmental Compliance Program unfolds.

3. The Corps has an ethical and legal obligation to protect our environment through prevention, compliance, restoration and stewardship. We are counting on your support and enthusiasm, coupled with the evolving USACE Facilities Environmental Compliance Program, to demonstrate our commitment to, and capabilities in, environmental protection.

H. J. HATCH
Lieutenant General, USA
Commanding



DEPARTMENT OF THE ARMY

U.S. Army Corps of Engineers
WASHINGTON, D.C. 20314-1000REPLY TO
ATTENTION OF:

S: 15 February 1991

CECW-ON

MEMORANDUM FOR MAJOR SUBORDINATE COMMANDS AND DISTRICT COMMANDS

SUBJECT: Environmental Review Guide for Operations (ERGO)

1. I am enclosing the Environmental Review Guide for Operations (ERGO), a checklist for analyzing compliance with environmental laws and regulations at our operating projects. Copies are being sent to all District Operations offices for distribution to projects. We are releasing ERGO as a test document for use during the remainder of FY 91. An implementation workshop is in the planning stage. Specifics will be provided later.
2. Lieutenant General Hatch, in his 14 February 1990 letter, "Strategic Direction for Environmental Engineering", echoed Secretary Cheney's call for DOD to be the "Federal leader in environmental compliance and protection." ERGO is a pro-active approach to compliance.
3. The Construction Engineering Research Laboratory developed ERGO. A steering committee with Division, District and project members from Operations elements provided guidance and direction. Their goal was to produce a self-assessment tool for managers of operating projects with District teams, State agencies, contractors and the United States Army Toxic and Hazardous Waste Agency as potential sources of support.
4. Environmental compliance is a legal and ethical responsibility, an integral part of doing business. I ask that you apply ERGO at one or more projects in each District this FY.
5. We will need feedback to update ERGO for full implementation in FY 92. Every Division and District Operations office should formally designate an environmental compliance coordinator. These individuals will be our POCs regarding ERGO and other environmental matters. They will act as liaisons with the various functional areas within Operations organizations, and with POCs from other elements with environmental responsibilities. Please forward the names, office symbols, and telephone numbers of your Division and District environmental compliance coordinators to CECW-ON, ATTN: Jim Wolcott by 15 February 1991.

FOR THE DIRECTOR OF CIVIL WORKS:

JOHN P. ELMORE
Chief, Operations, Construction and
Readiness Division
Directorate of Civil Works



DEPARTMENT OF THE ARMY
U.S. Army Corps of Engineers
WASHINGTON, D.C. 20314-1000

REPLY TO
ATTENTION OF:

DEC 1991

10 January 1992

CECW-ON

MEMORANDUM FOR MAJOR SUBORDINATE COMMANDS

SUBJECT: FY 92 Environmental Assessments at Operating Projects

1. As managers of over 400 water resources projects and stewards of 11.7 million acres of land and water, we individually and corporately have an ethical and legal responsibility to protect the environment. Your positive response to the Environmental Review Guide for Operations (ERGO) we distributed last January is appreciated. We are now ready to proceed with an organization-wide series of ERGO assessments. The FY 92 target is to complete ERGO assessments at 25 percent of our O&M General funded operating projects and facilities. The remainder will be assessed within the following two years. Assessments of facilities and projects operated with other than O&M General funds will be addressed by separate memorandum.

2. As an indication of the importance of this effort, we are providing dedicated O&M funding from headquarters to insure that these assessments are completed. Enclosed is a list of funds available for allocation to each division. These funds are for conducting assessments and converting findings into corrective action plans. Corrective actions are to be implemented through routine budgeting and reprogramming procedures. We ask that you respond with a list of projects, by district, at which ERGO evaluations will be conducted in FY 92, and the portion of your division's total allocation we should distribute to each project on your list. Include the CWIS number with each project you identify. Please respond to Denise White of our Natural Resources Management Branch (CECW-ON) by 10 January 1992.

3. In selecting projects and facilities for FY 92 assessments, we recommend that you concentrate on locations having the greatest potential for significant compliance shortfalls. When evaluating projects, evaluate all functions (hydropower, recreation, etc.) at the same time, to obtain comprehensive project assessments and action plans.

4. Our overall FY 92 budget for ERGO assessments is based on an estimated average cost of \$13K per project. To contain costs, use ERGO in conjunction with the representative sampling techniques presented at the Kansas City and Dallas ERGO orientation sessions.

CECW-ON

SUBJECT: FY 92 Environmental Assessments at Operating Projects

Contact Dr. Diane Mann of Construction Engineering Research Laboratory (CERL) at 217-373-6741 for help in designing representative sampling formats.

5. ERGO was developed as a self-assessment tool for managers of operating projects, with district teams, state agencies, and contractors as potential sources of support. Because of the complexity of the laws and regulations, several respondents from the FY 91 effort commented on the benefits of inter disciplinary teams, including representation from offices such as Engineering, Logistics, Planning, Real Estate, and Safety and Occupational Health. While we are not specifying the way this first round of assessments is to be conducted, we are requiring the involvement, to the extent possible, of personnel from the project or facility being assessed to maximize training benefits. We are also emphasizing quality products that will withstand independent scrutiny.

6. Real Estate is responsible for reviewing user compliance with real estate instrument provisions, and reviewing environmental compliance clauses in such outgrants. ERGO is designed to apply to operating projects and facilities, including outgrants. We understand that in some locations the concept of applying ERGO to outgrants and concessions is surfacing unanticipated issues. Outgrant related issues will be addressed at the joint Real Estate/Natural Resources Meeting scheduled for January 1992. Please be sure that your representatives come to that meeting with complete and current information, both positive and negative. More specific guidance will be issued following that meeting.

7. In January 1992, we will distribute an updated ERGO manual reflecting FY 91 user feedback and incorporating new and revised laws and regulations. As you proceed with ERGO assessments in FY 92, it is especially important that you record "lessons learned" and track costs per assessment, including report and action plan development costs.

8. In support of our commitment to promote environmental compliance at all levels and functions, we have tasked CERL with developing and conducting ERGO orientation programs at our districts during the FY 92/93 time frame. A video based ERGO training course has also been approved for development by Huntsville Division. Additional information will be provided as these projects progress.

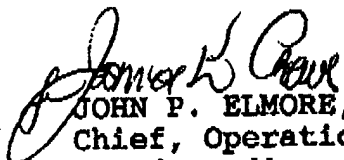
CECW-ON

SUBJECT: FY 92 Environmental Assessments at Operating Projects

3. PERIODIC EAWO assessments are the foundation of the environmental compliance program and your comments and recommendations are welcome at any time. They can be directed to Denise White at 202-272-0794.

FOR THE DIRECTOR OF CIVIL WORKS:

Encl


JOHN P. ELMORE, P.E.
Chief, Operations, Construction
and Readiness Division
Directorate of Civil Works

**ENVIRONMENTAL REVIEW GUIDE FOR OPERATIONS (ERGO)
FISCAL YEAR 92 BUDGET DISTRIBUTION**

The following is a listing of funding distribution in thousands of dollars to division offices for performing ERGO assessments.
NOTE: Construction General (CG) and Mississippi River and Tributaries (MR&T) funded projects were not considered.

<u>Division</u>	<u>Amount</u>
IMD	145.0
MRD	105.0
NAD	95.0
NCD	210.0
NED	105.0
NPD	130.0
ORD	455.0
SAD	185.0
SPD	65.0
SWD	<u>430.0</u>
TOTAL	1,925.0



DEPARTMENT OF THE ARMY

U.S. ARMY CORPS OF ENGINEERS
KINGMAN BUILDING
FORT BELVOIR, VA 22060 -

REPLY TO
ATTENTION OF:

CEIG-I (20-1g)

17 DEC 1991

MEMORANDUM FOR ALL DISTRICT AND DIVISION COMMANDERS

SUBJECT: Environmental Compliance Concerns Within USACE

1. Earlier this year my office completed a systemic inspection of environmental compliance on lands controlled by USACE. A copy of this report has been recently distributed to your command and should be reviewed by you and members of your staff. We reported to the Chief that compliance problems exist across USACE with the many Federal, State and local environmental laws. We found at HQUSACE, and throughout the Corps:

- a. Organizational confusion as to who was in charge of environmental compliance.
- b. Lack of comprehensive guidance.
- c. Lack of Corps-wide policy on disposal of our hazardous materials and hazardous waste.
- d. Training shortfalls.
- e. Inadequate environmental assessment/inspection on lands we control.
- f. Failure to program resources to insure environmental compliance.
- g. Problems with environmental compliance on Corps lands leased to others for use.
- h. Unfulfilled commitments to mitigate environmental impact on many Corps projects.

2. Our inspection teams visited fourteen districts in eight divisions and a laboratory. Inspectors physically toured over 240 different sites. They found compliance issues at virtually every site visited. Enclosed are pictures of typical findings.

3. I would like to emphasize that the situations shown in the pictures are typical and were not found at only one location or in any one particular district. Rather, they are likely to exist at any site or possibly at every site. I urge you and your staff to make it a special point to visit all land under your jurisdiction, especially lands leased and outgranted to others, with a keen eye to discover any environmental compliance

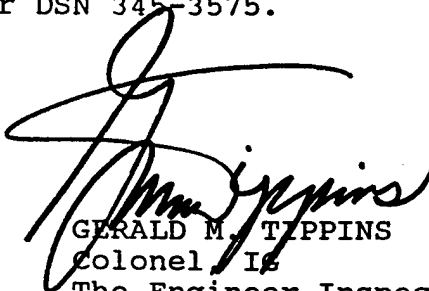
CEIG-I (20-1g)

SUBJECT: Environmental Compliance Concerns Within USACE

violations or problems. You then need to follow through and insure resources are programed and dedicated to correct these problems in a timely fashion.

4. The U.S. Army Toxic and Hazardous Materials Agency (USATHAMA) is available to answer environmental questions at 1-800 USA EVHL. My POC for this action is LTC Dan Shuey or LTC Fred Streb at Commercial (703)355-3575 or DSN 345-3575.

FOR THE COMMANDER:



GERALD M. TIPPINS

Colonel, IG

The Engineer Inspector General

Encl

CF:

CECER

CECRL

CETEC

CEWES

CEHSC

CETHA

CECW-ZA (MG Williams)

CECW-O (Mr. Elmore)

ENVIRONMENTAL INSPECTION PHOTOGRAPHS



Photograph 1

Storage Area

Area of Concern:

1. Violation of RCRA, CERCLA, and TSCA
2. Soil Contamination
3. Improper storage/disposal of HTW

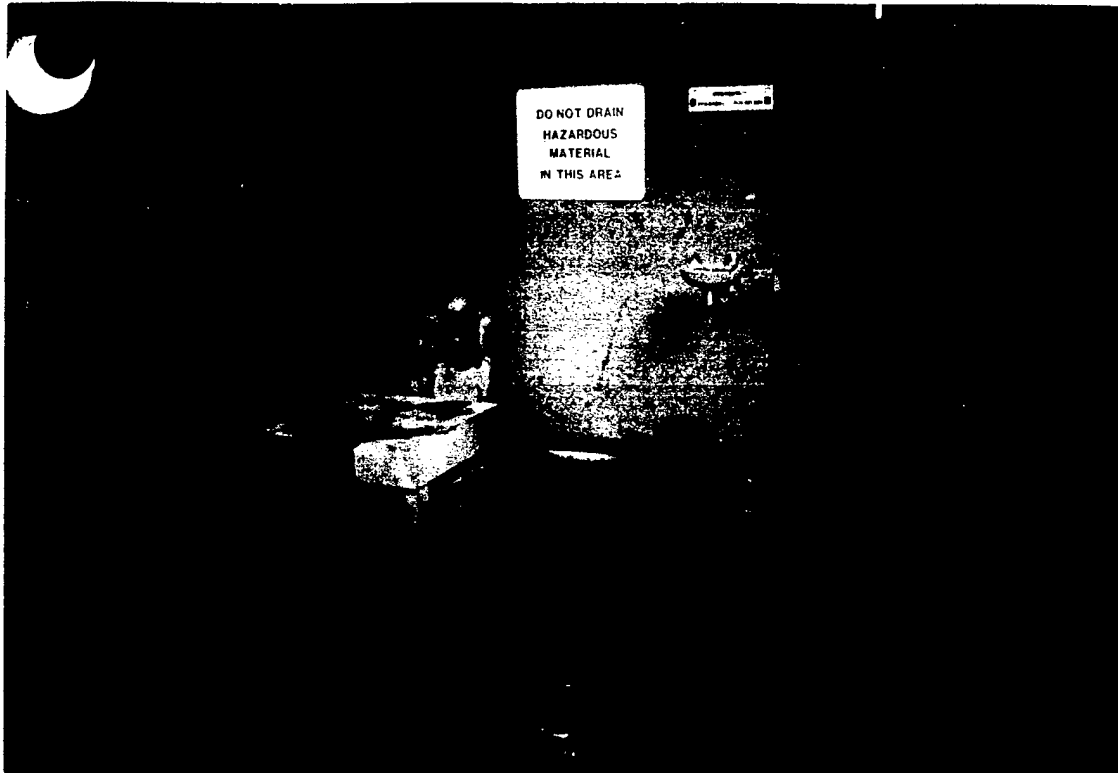


Photograph 2

Maint. & Paint Shop

Area of Concern:

1. Violation of CWA
2. Requires NPDES permit
3. Discharge of Hazardous waste into reported storm drain



Photograph 3

Maint. & Paint
Storage Area

Area of concern:

1. Violation of RCRA and CWA
2. NPDES permit required
3. Discharge of Hazardous Material into reported storm drain



Photograph 4

Used Oil Storage
Area

Area of Concern:

1. Violation of RCRA
2. Soil contamination
3. Requires spill contingency plan
4. Housekeeping



Photograph 5

Lock and Dam

Area of Concern:

1. Violation of CWA
2. Spill prevention plan
3. Contamination of project waters

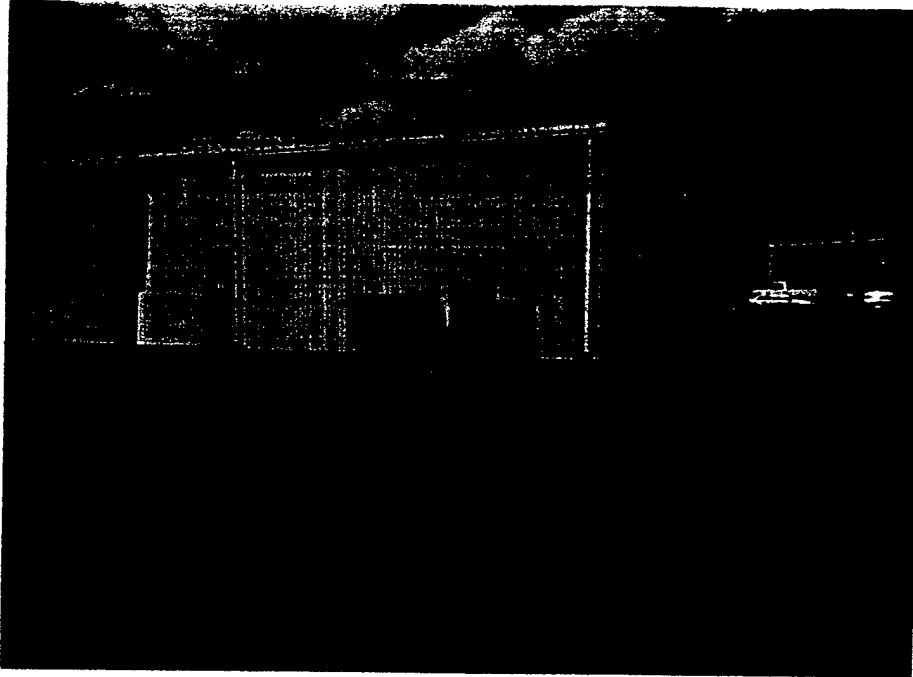


Photograph 6

Hydropower Plant
Transformers

Area of Concern:

1. Violation of CWA and CERCLA
2. Soil contamination
3. Discharge of Hazardous materials (possible PCB)



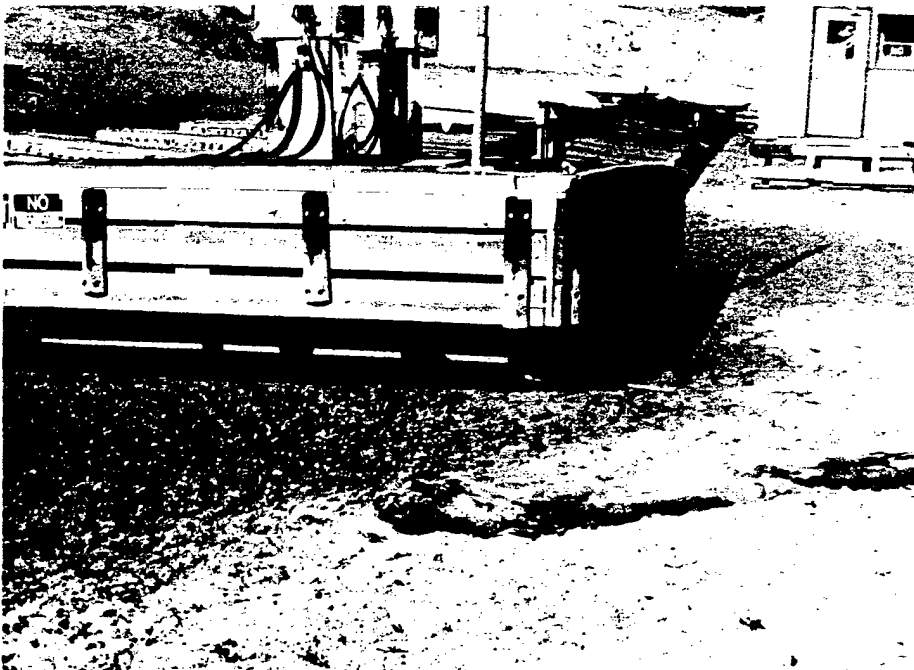
Photograph 7

Diesel Oil Storage Tanks

Area of Concern:

1. Soil contamination

2. Location of storm drain requires spill contingency plan



Photograph 8

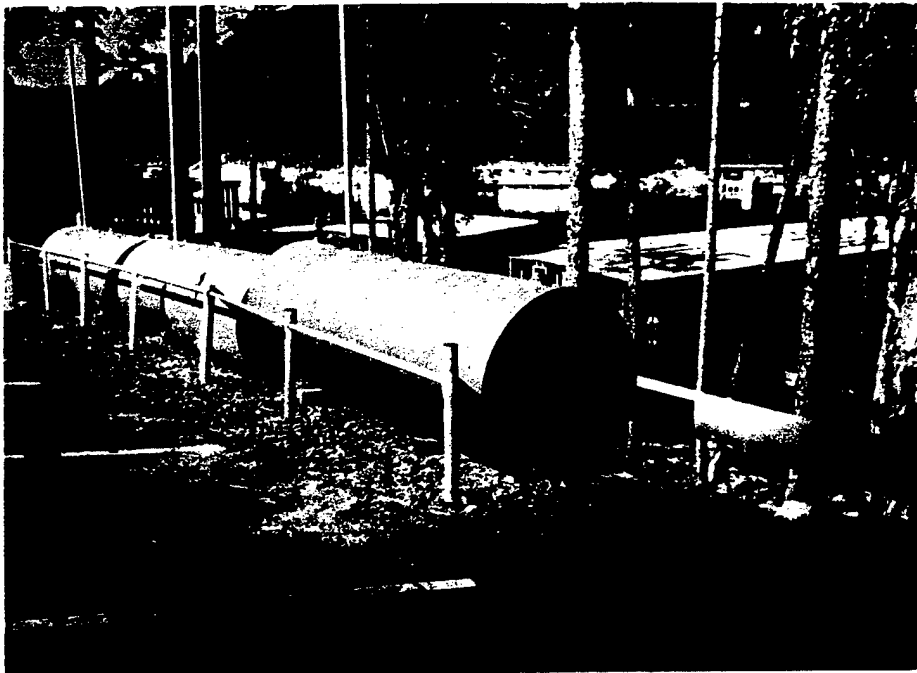
Gasoline Dispensers in a Marina.

Area of Concern:

1. Violation of CWA

2. Contamination of project waters

3. Lack of environmental compliance/enforcement on real estate lease



Photograph 9

Fuel Storage
Area in Marina.

Area of Concern:

1. Violation of CWA
2. Requires spill contingency plan
3. Lack of environmental compliance/enforcement on real estate lease



Photograph 10

Dispensing Area

Area of Concern:

1. Soil contamination
2. Spill contingency plan
3. Housekeeping

Photograph 11

Solid Waste Disposal site

Area of Concern:

1. Violation of solid waste disposal regulations

2. Creosote timbers: Violation of CERCLA

3. Potential NPL site



Photograph 12

Used Drums & Metal Storage Area

Area of Concern:

1. Violation of RCRA and solid waste regulations

2. Soil contamination

3. Improper storage of HTW

4. Lease enforcement



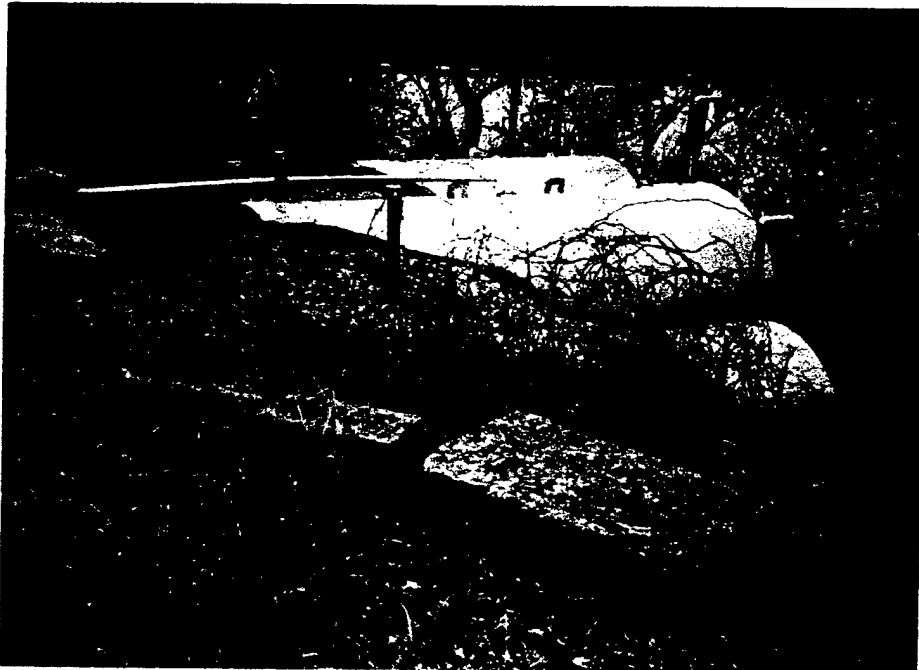


Photograph 13

Storage/Wash and
Fuel Transfer
Site

Area of Concern:

- 1. Violation of RCRA and CERCLA**
- 2. Soil contamination**
- 3. Requires spill contingency plan**
- 4. Improper storage of hazardous materials**
- 5. Housekeeping**



Photograph 14

Fuel Storage
Area

**Areas of
Concern:**

- 1. Violation of RCRA and CWA**
- 2. Requires spill contingency plan**
- 3. Underground fuel storage tank requirements**



Photograph 15

Batteries Storage Area

Area of concern:

1. Violation of CWA, CERCLA

2. Contamination of Project Waters

3. Lease enforcement



Photograph 16

Contractor's Storage Tank

Area of Concern:

1. Violation of CWA

2. Soil contamination

3. Enforcement of Contract Requirements for Environmental Compliance.

4. Spill contingency plan

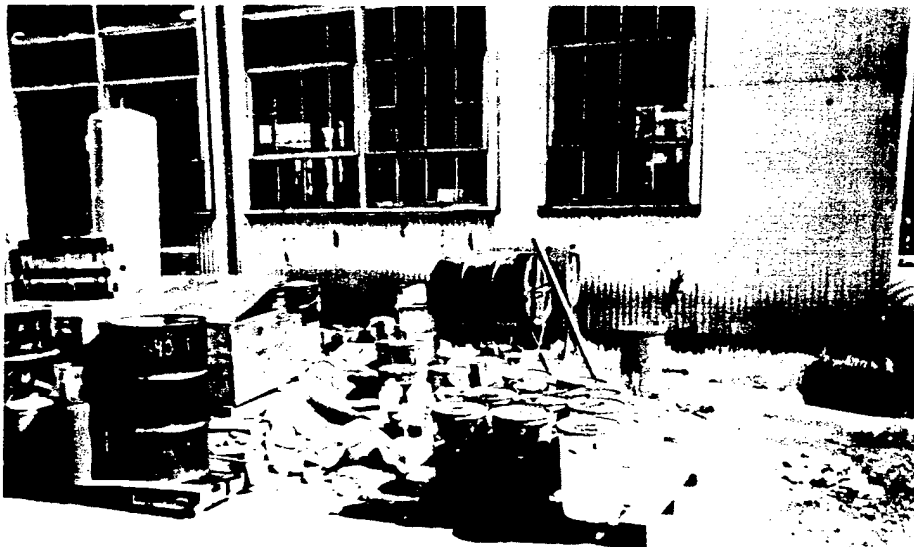


Photograph 17

Oil Rights
Outgrant

Area of Concern:

1. Violation of RCRA, CWA
2. Soil Contamination
3. Lease enforcement
4. Spill contingency plan



Photograph 18

Oil, Paint Storage
Area

Area of Concern:

1. Violation of RCRA
2. Improper storage of HTW
3. Soil contamination
4. Housekeeping
5. Spill contingency plan

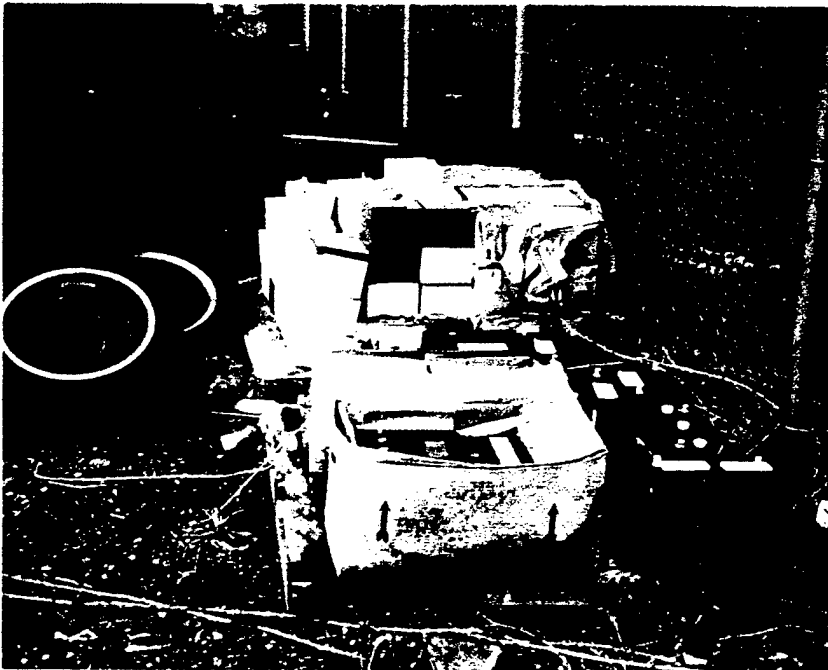


Photograph 19

Paint, Oil Storage Area

Area of Concern:

1. Violation of RCRA, CERCLA
2. Soil contamination
3. Improper storage/disposal of HTW
4. Housekeeping
5. Spill contingency plan

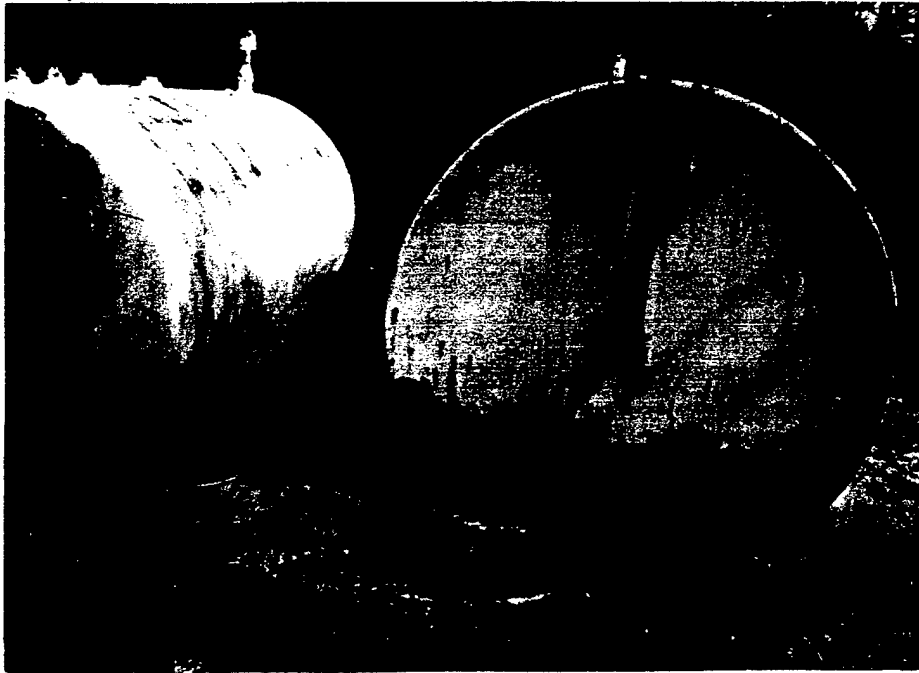


Photograph 20

Batteries Storage Area

Area of Concern:

1. Violation of RCRA, CERCLA
2. Improper storage/disposal of HTW
3. Spill contingency plan



Photograph 21

Fuel Tanks

Area of Concern:

1. Violation of RCRA
2. Spill contingency



Photograph 22

Contractor's
Fuel Dispensing
Area

Area of Concern:

1. Soil contamination
2. Poor house-keeping
3. Spill contingency plan

Appendix C

ENVIRONMENTAL COMPLIANCE

ABBREVIATION LIST

CAA	-	Clean Air Act
CFR	-	Code of Federal Regulations
CO	-	Carbon Monoxide
CWA	-	Clean Water Act
DoD	-	Department of Defense
ECC	-	Environmental Compliance Coordinator
EPA	-	Environmental Protection Agency
ECAS	-	Environmental Compliance Assessment System
ERGO	-	Environmental Review Guide for Operations
FIFRA	-	Federal Insecticide, Fungicide, and Rodenticide Act
FWS	-	U.S. Fish and Wildlife Service
MP	-	Management Practice
MSDS	-	Material Safety Data Sheet
NAAQS	-	National Ambient Air Quality Standards
NEPA	-	National Environmental Policy Act
NFPA	-	National Fire Protection Act
NHCar	-	New Hampshire Code of Administrative Regulations
NHPA	-	National Historic Preservation Act
NHRM	-	Natural and Historic Resources Management
NO ^x	-	Nitrogen Oxides
NPDES	-	National Pollutant Discharge Elimination System
NRM	-	Natural Resources Management
OHSPC	-	Oil and Hazardous Substances Pollution Contingency Plan
OMP	-	Operational Management Plan
PCB's	-	Polychlorinated Biphenyls
pCi/L	-	picoCurie per Liter
PMP	-	Pest Management Plan
POL	-	Petroleum Based Fuel or Lubricant
PPM	-	Parts Per Million
RCRA	-	Resource Conservation and Recovery Act
SARA	-	Superfund Amendments and Reauthorization Act of 1986
SDWA	-	Safe Drinking Water Act
SHPO	-	State Historic Preservation Officer
SPCC	-	Spill Prevention Control and Countermeasures
TCLP	-	Toxic Constituent Leaching Procedure
TSCA	-	Toxic Substances Control Act
TSDF	-	Treatment, Storage, and Disposal Facility
UFO	-	Unidentified Flying Object
USACE	-	U. S. Army Corps of Engineers
UST	-	Underground Storage Tanks
VOC	-	Volatile Organic Compound

Appendix D



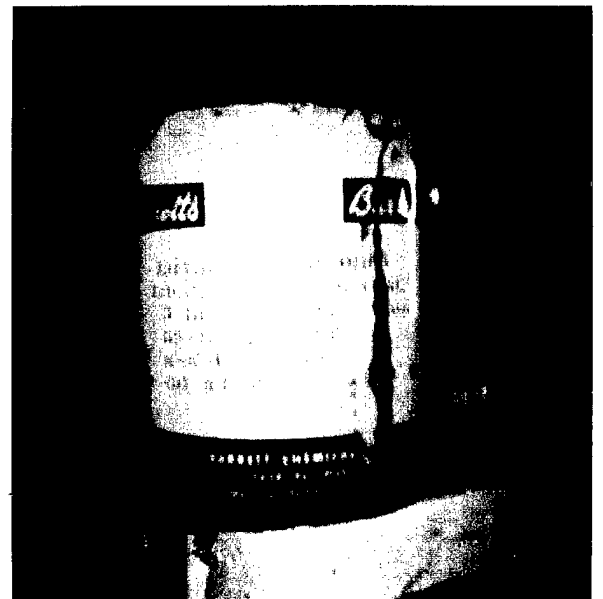
Photograph 1



Photograph 2



Photograph 3



Photograph 4



Photograph 5



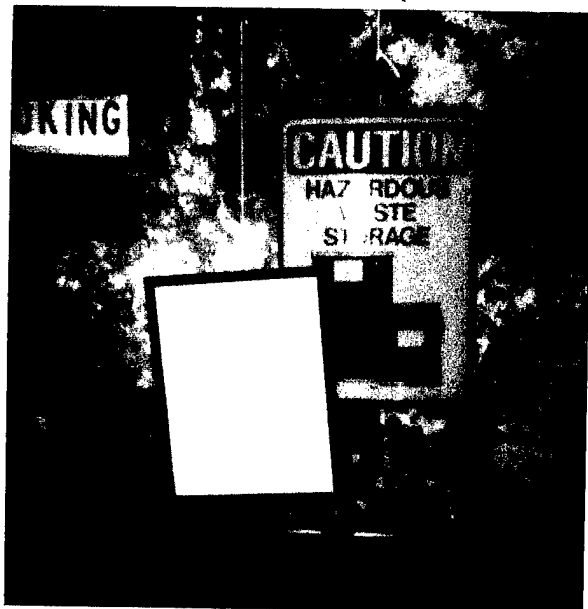
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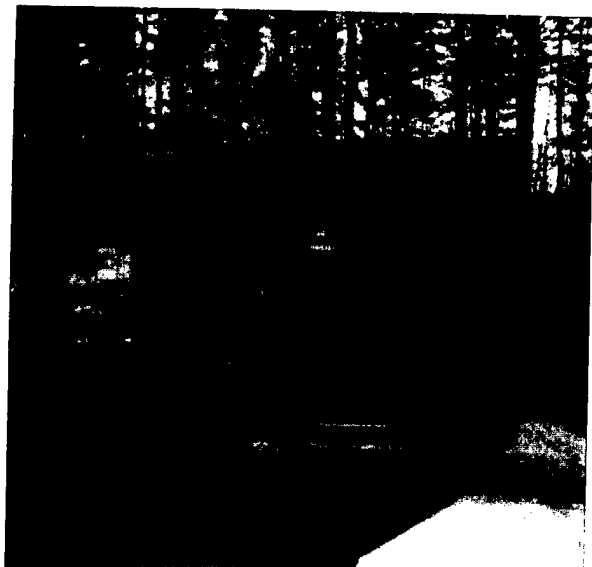
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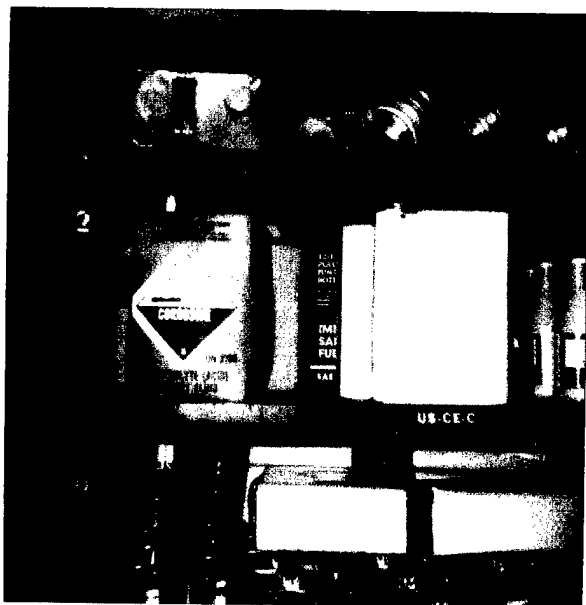
Photograph 8



Photograph 9



Photograph 10



Photograph 11



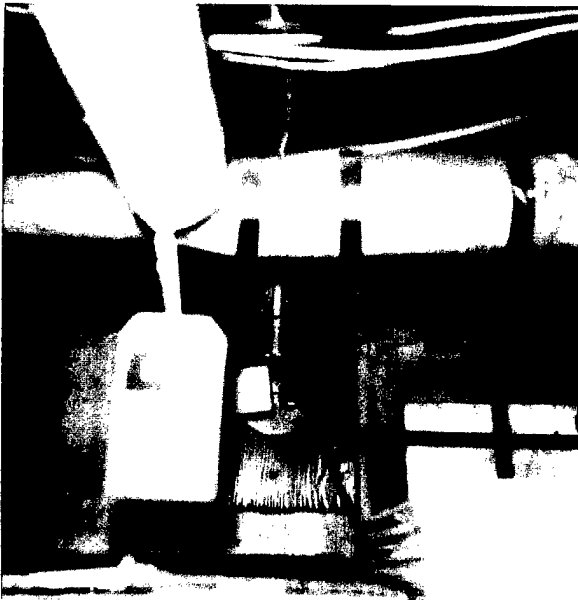
Photograph 12



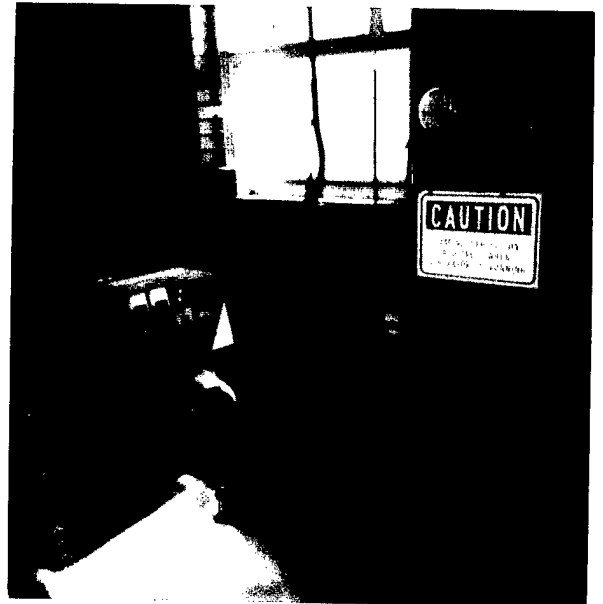
Photograph 13



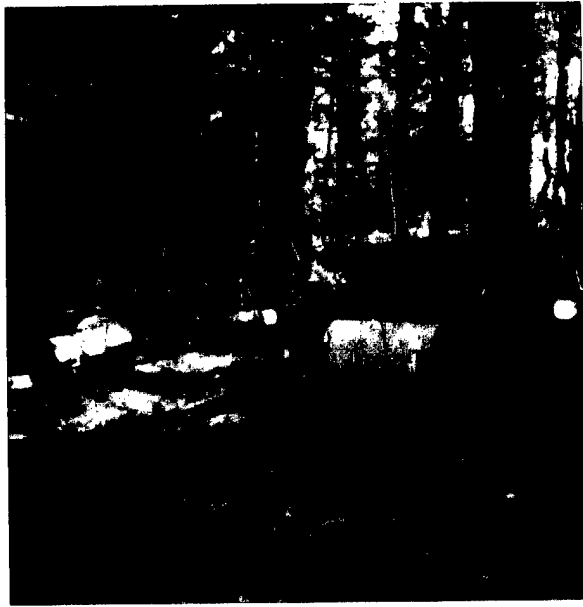
Photograph 14



Photograph 15



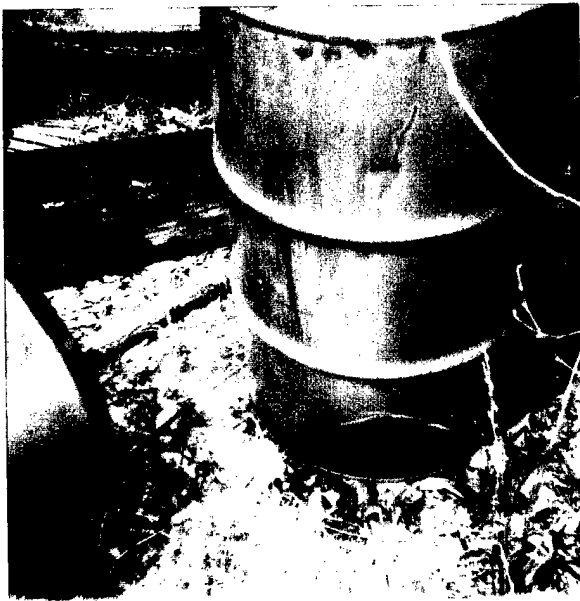
Photograph 16



Photograph 17



Photograph 18



Photograph 19



Photograph 20



Photograph 21



Photograph 22



Photograph 23



Photograph 24



Photograph 25



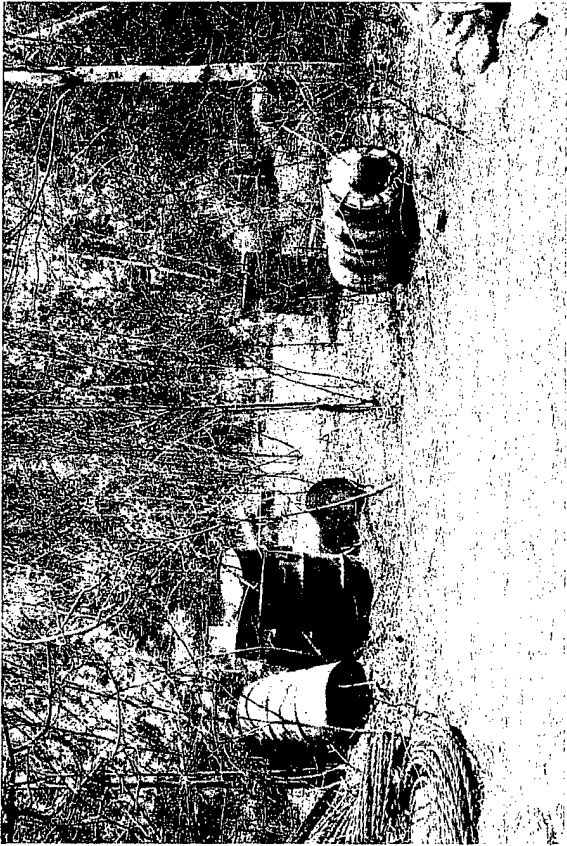
Photograph 26



Photograph 27



Photograph 28



Photograph 29



Photograph 30



Photograph 31



Photograph 32



Photograph 33



Photograph 34



Appendix E

REF. TO SECTION 3 # 6



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J. F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203

July 20, 1987

Gerald Bartlett
U.S. Army Corps of Engineering N.E.D.
RFD #2, Tully Lake
Athol, MA 01331-9806

RE: Verification of EPA I.D. Number

Dear Mr. Bartlett:

This letter is a written acknowledgement of the receipt of your Notification of Hazardous Waste Activity Form and the assigning of EPA I.D. Number (MA2960009817) to the above company at the above location. This letter is to serve in lieu of EPA Form 8700-12B(4-80) Acknowledgement of Notification of Hazardous Waste Activity (Verification). Please reference your EPA I.D. Number on all correspondence with the MA Department of Environmental Quality Engineering (DEQE) and EPA. If you have any questions regarding this acknowledgement, please contact Scott Hurd of the EPA at (617) 223-1356.

Sincerely,

for Handwritten signature of Scott A. Hurd in cursive.

Tanya R. Sweeney, Chemical Engineer
MA Waste Regulation Section

cc: Scott Hurd - EPA
Anne Crawley - DEQE

SECTION 9 # 10

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF ENVIRONMENTAL QUALITY ENGINEERING
DIVISION OF HAZARDOUS WASTE
One Winter Street
Boston, Massachusetts 02108

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

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator US EPA ID No. MA296000981700001		Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address U.S. Army Corps of Engineers Tully Lake Dam, Route #32 R.F.D. #2, Athol, MA 01331		4. Generator's Phone ()		6. US EPA ID Number		7. Transporter 1 Company Name Clean Harbors of Kingston, Inc.		8. US EPA ID Number MA103932250	
5. Transporter 2 Company Name		6. US EPA ID Number		7. Transporter 1 Company Name		8. US EPA ID Number		9. Designated Facility Name and Site Address Clean Harbors of Braintree, Inc. 385 Quincy Ave. Braintree, MA 02184	
7. Transporter 2 Company Name		8. US EPA ID Number		9. Designated Facility Name and Site Address		10. US EPA ID Number MA1053452637		11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	
9. Designated Facility Name and Site Address		10. US EPA ID Number		11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No. Type		13. Total Quantity	
10. US EPA ID Number		11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		15. Special Handling Instructions and Additional Information <i>IN CASE OF EMERGENCY CALL 1-800-424-8802</i>	
12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		15. Special Handling Instructions and Additional Information		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.	
13. Total Quantity		14. Unit Wt/Vol		15. Special Handling Instructions and Additional Information		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.		17. Transporter 1 Acknowledgement of Receipt of Materials	
14. Unit Wt/Vol		15. Special Handling Instructions and Additional Information		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.		17. Transporter 1 Acknowledgement of Receipt of Materials		18. Transporter 2 Acknowledgement of Receipt of Materials	
15. Special Handling Instructions and Additional Information		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.		17. Transporter 1 Acknowledgement of Receipt of Materials		18. Transporter 2 Acknowledgement of Receipt of Materials		19. Discrepancy Indication Space	
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.		17. Transporter 1 Acknowledgement of Receipt of Materials		18. Transporter 2 Acknowledgement of Receipt of Materials		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.	
17. Transporter 1 Acknowledgement of Receipt of Materials		18. Transporter 2 Acknowledgement of Receipt of Materials		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.		Date	
18. Transporter 2 Acknowledgement of Receipt of Materials		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.		Date		Month Day Year	
19. Discrepancy Indication Space		20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.		Date		Month Day Year		Month Day Year	
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.		Date		Month Day Year		Month Day Year		Month Day Year	

In case of emergency or spill, immediately call the National Response Center (800) 424-8802.

GENERATOR
TRANSPORTER
FACILITY

2426

STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION
 Hazardous Waste MANIFEST SECTION, State Office Building, Hartford, CT 06106



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

7793

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. MA P000008.173		Manifest Document No. 000001		2. Page 1 of 1		Information in the shaded areas is not required by Federal law, but may be required by State law.			
Generator's Name and Mailing Address U.S. Army Corps Of Engineers NED Tully Lake Dam RFD # 2 Athol, Mass 01331 9806						A. State Manifest Document Number CT A 0058076					
4. Generator's Phone 617 249 9150						B. State Gen. ID ME SAME					
5. Transporter 1 Company Name Inland Waters Pollution Control						C. State Tran. ID 14340 NJ					
7. Transporter 2 Company Name						D. Tran. Phone (312) 479-0400					
9. Designated Facility Name and Site Address EW, Inc Environmental Waste Resources 130 Freight St., Waterbury, CT 06702						G. State Facility ID C.T.D.O.7.2.1.3.8.9.6.9					
10. US EPA ID Number						H. Facility's Phone (303) 755-2222					
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers No.	13. Total Quantity	14. Unit Wt/Vol					
a. * Waste Flammable Solvents, m.o.s. Flammable Liquids UN1993				0.01 TT	0.055	3					
b.				.	.	.					
c.				.	.	.					
d.				.	.	.					
J. Additional Description for Materials Listed Above											
a. ketones, aromatics											
b.											
c.											
d.											
15. Special Handling Instructions and Additional Information											
Waste Stream # A07793 RQ 100 lbs. ERG #26				"Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste manifest, I hereby certify that the volume and toxicity of waste is as stated, and that the waste is managed or disposed currently available to me which minimizes the present and future threat to human health and the environment."							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations, and all applicable State laws and regulations.											
Printed/Typed Name GERALD W BARTLETT				Signature <i>Gerald W Bartlett</i>				Date Month Day Year 6 24 86			
17. Transporter 1 Acknowledgement of Receipt of Materials				Printed/Typed Name Donald F. Gauvin				Signature <i>Donald F Gauvin</i>		Date Month Day Year 6 24 86	
18. Transporter 2 Acknowledgement or Receipt of Materials				Printed/Typed Name				Signature		Date Month Day Year	
19. Discrepancy Indication Space											
Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.											
Printed/Typed Name LARRY CALHOUN				Signature <i>Larry Calhoun</i>				Date Month Day Year 06 25 86			

COPY 3: GENERATOR COMPLETED COPY

CT A 0058076

FOR SPILLS WITHIN CONNECTICUT, CONTACT CT DEP - OIL AND CHEMICAL SPILLS AT (203) 566-3338.

DISPOSITION FORM

For use of this form, see AR 340-15; the proponent agency is TAGO.

REFERENCE OR OFFICE SYMBOL	SUBJECT
CENED-OD-PL (200-1c)	Hazardous Materials (Herbicides) stored at Tully Lake, MA.

TO	FROM	DATE	CMT 1
Chief, Project Operations Branch	Park Ranger LCRB	20 March 89 Williams	

1. The following hazardous materials (Herbicides are currently being stored at Tully Lake. The following list contains trade names, chemical formulas, EPA registration numbers and quantity and condition of each container.

Silvex (2 4 5-T) 4 gallons (In one gallon containers).
Trichlorophenoxy propionic acid
Isooctyl Ester of Silvex
EPA Reg. #148-479 EPA Est. #148-KS-1
3 gallon containers are leaking.
Thompson Hayward Chemical Company, Kansas City, KA

Ded-Weed LV9 (2 4 5-T) 5 gallons (5 gallon container).
2-4-5 Trichlorophex
USDA # 148-431 Mfg. 4-68 pre EPA manufactured.
Thompson Hayward Chemical Company, Kansas City, KA

Weed-Done (2 4 5-T & 2 4 5-D) 5 gallons (5 gallon container).
Amchem Products, Inc., Fremont CA and Amber, PA.
pre EPA manufactured No EPA #

Dow Formula 40 (2 4 5-D) 5 gallons (5 gallon container).
Aokanolamine Salts of the ethanonal & isopropanol series &
of 2 4-Dichlorophenoxy acetic acid
EPA Reg. #464-1-AA EPA Est. #464-M1-1 Lot MM
Dow Chemical. No address given.

2. These herbicides are stored in the original containers. All original containers have been set inside of 2 plastic-lined 55 gallon drums.

3. We have arranged for disposal of all other non-hazardous waste materials stored at Tully Lake with New England Industrial Waste, Inc.



R. Bruce Williams
Park Ranger, LCRB

cf:LCRB files
Tully Lake

REF. TO SECTION 4 # 1.6



TEXAS WATER COMMISSION
 P.O. Box 13087, Capitol Station
 Austin, Texas 78711-3087

PO# DAC W 3389 M 1030

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

Form approved. OMB No. 2050-0039, expires 09-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. MA 2-960-00981-5W4140		Manifest Document No. W4140		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address U.S. Army Corps of Engineers, UEO RFD # 2, Tully Lake Dam Athol, MA 01420		A. State Manifest Document Number MA 00093412		B. State Generator's ID 99925		C. State Transporter's ID MA 656-830		D. Transporter's Phone (508) 657-1163	
4. Generator's Phone 508 1249-9150		6. US EPA ID Number WAD 9-805-23203		E. State Transporter's ID		F. Transporter's Phone		G. State Facility's ID HW-50225-001	
5. Transporter 1 Company Name Clean Harbors of Natick, Inc		8. US EPA ID Number		H. Facility's Phone 1-800-446-5777		9. Designated Facility Name and Site Address Technical Environmental Systems, Inc 500 Battleground Road La Porte, Texas		10. US EPA ID Number TX 0982290140	
7. Transporter 2 Company Name		11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number) a. R.Q. Hazardous Waste Liquid, N.O.S (F02) ORM-E NA 9189		12. Containers No. Type 001 DM		13. Total Quantity 0.0055 G		14. Unit Wt/Vol G	
11A. HM		15. Special Handling Instructions and Additional Information		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, including applicable state 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 Gerald W Bartlett		Signature Gerald W Bartlett	
17. Transporter 1 Acknowledgement of Receipt of Materials		Printed/Typed Name Daniel R. Mahanor		Signature Daniel R. Mahanor		Month Day Year 7 14 89		Date	
18. Transporter 2 Acknowledgement of Receipt of Materials		Printed/Typed Name		Signature		Month Day Year		Date	
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		Signature		Month Day Year	

GENERATOR

TRANSPORTER

FACILITY

SECTION 4 # 10

SUMMER CONSERVATION POOL
ELEV. 641 - 300 ACRES

SPILLWAY CREST
ELEV. 668

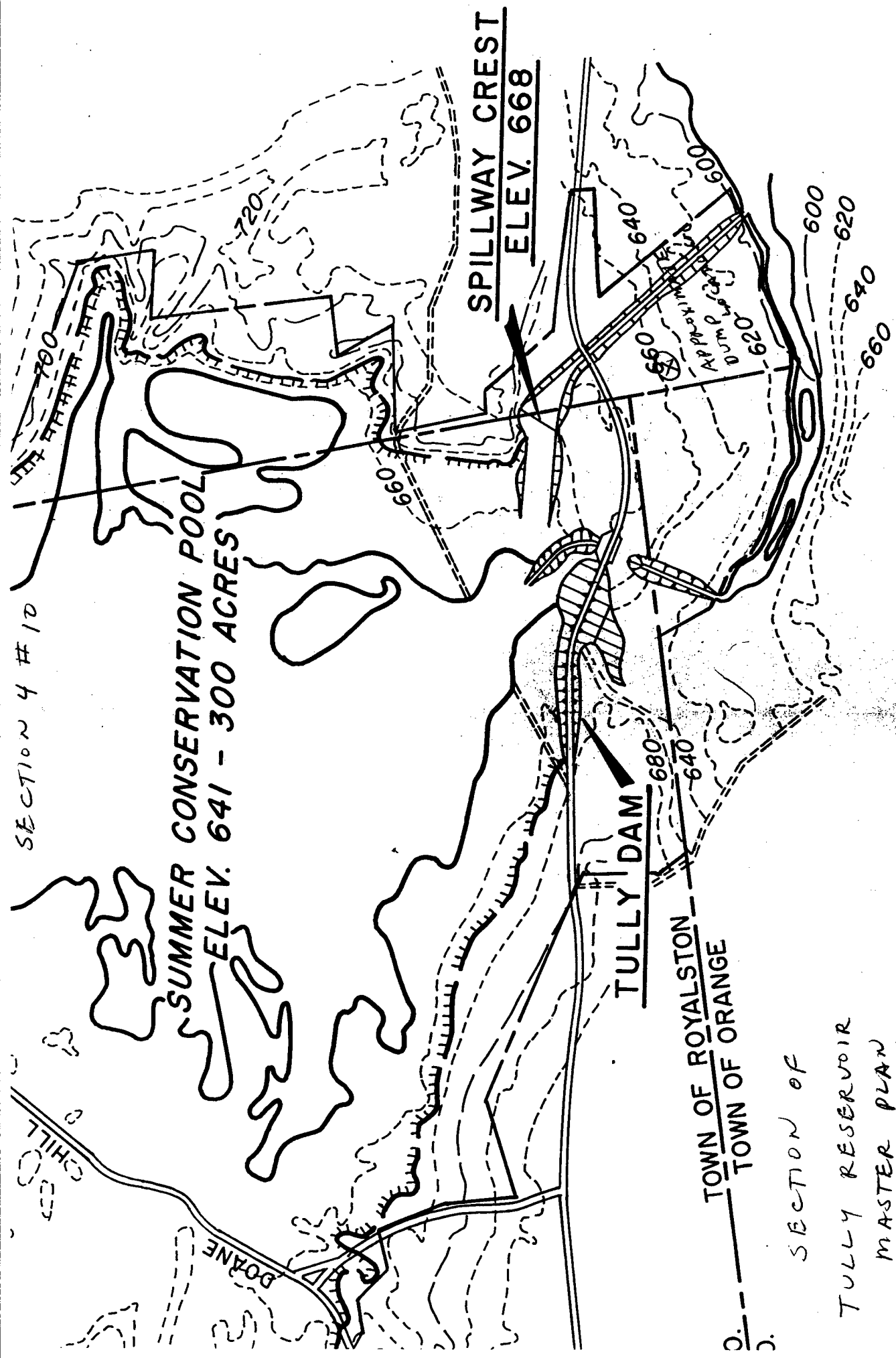
TULLY DAM

TOWN OF ROYALSTON
TOWN OF ORANGE

SECTION OF
TULLY RESERVOIR
MASTER PLAN

GENERAL DEVELOPMENT PLAN
JUNE 1965

SCALE ' = 800'





DEPARTMENT OF THE ARMY
NEW ENGLAND DIVISION, CORPS OF ENGINEERS
424 TRAPELO ROAD
WALTHAM, MASSACHUSETTS 02254-9149

REPLY TO
ATTENTION OF

CENED-CT-C

Date: 15 November 1991

MEMORANDUM FOR

- | | |
|--|---|
| <input type="checkbox"/> Engineering Directorate, DB | <input type="checkbox"/> Division Counsel |
| <input type="checkbox"/> Materials Laboratory | <input type="checkbox"/> Logistics Directorate |
| <input type="checkbox"/> Construction Directorate | <input type="checkbox"/> Security and Law Enforcement |
| <input type="checkbox"/> Real Estate Directorate | <input type="checkbox"/> IMO, Mail & Records |
| <input type="checkbox"/> Project Manager, Birch Hill Dam | <input type="checkbox"/> Contract File |
| <input type="checkbox"/> Operations Directorate | <input type="checkbox"/> <u>Files</u> |
| <input checked="" type="checkbox"/> <u>Project Manager, Tully Lake</u> | <input type="checkbox"/> <u>Project Manager, LCRB</u> |
| <input type="checkbox"/> Project Manager, N. Central Res. Office | |

PROJECT: Replace Fuel Tanks, Birch Hill Dam and Tully Lake, Athol, Massachusetts

SUBJECT: FINAL PAYMENT - Contract No. DACW33-90-C-0072

Huhtala Oil & Templeton Garage, Inc.
5 Main Street - Box 417
East Templeton, Massachusetts 01438-0417

Notification has been received from the Finance and Accounting Center that final payment under the subject contract has been processed and the contract is now officially closed. You are requested to proceed with disposition of your files related to this contract pursuant to AR 25-400-2.

Total Amount: \$83,537.50

FINAL PAYMENT MADE ON: November 5, 1991

Charles W. Coe
CHARLES W. COE
Director of Contracting *ERR*

SECTION 10 # 5,6

Tully Lake Dam

23 July 1991

Replacement fuel storage tank = Gate House

Total Dept of Hole is 8.5 ft Below gate house step .

BOTTOM IS LINED WITH 1 FT OF PEA STONE.

Bottom of the tank is 7.5 ft below the gate house steps.

Top of the tank is 3 ft below the gate house steps.

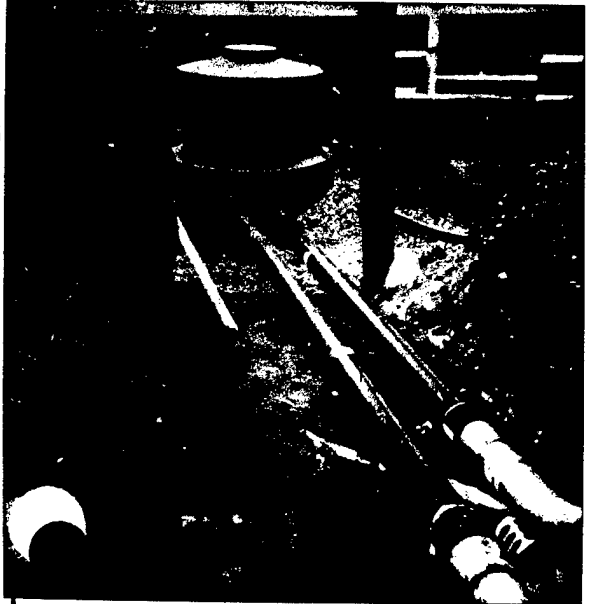
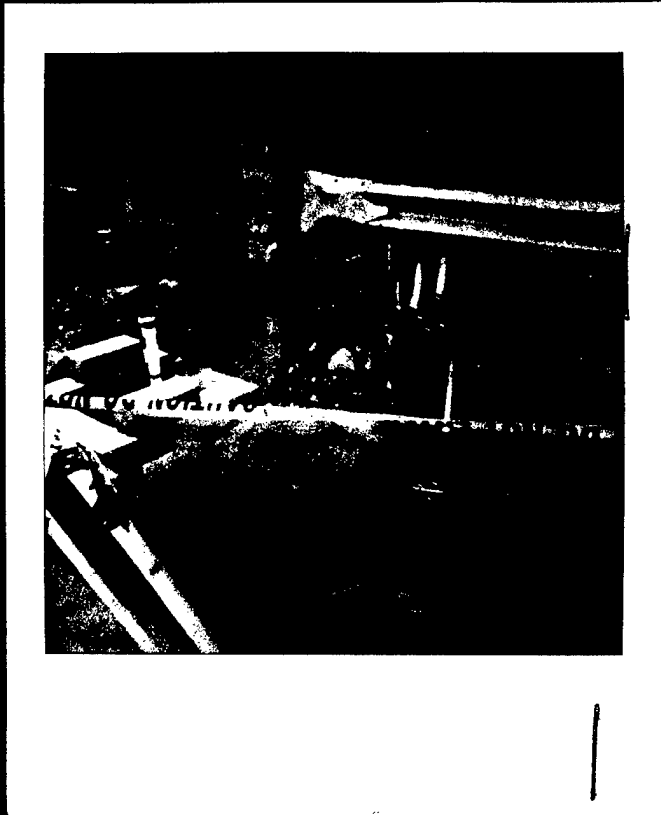
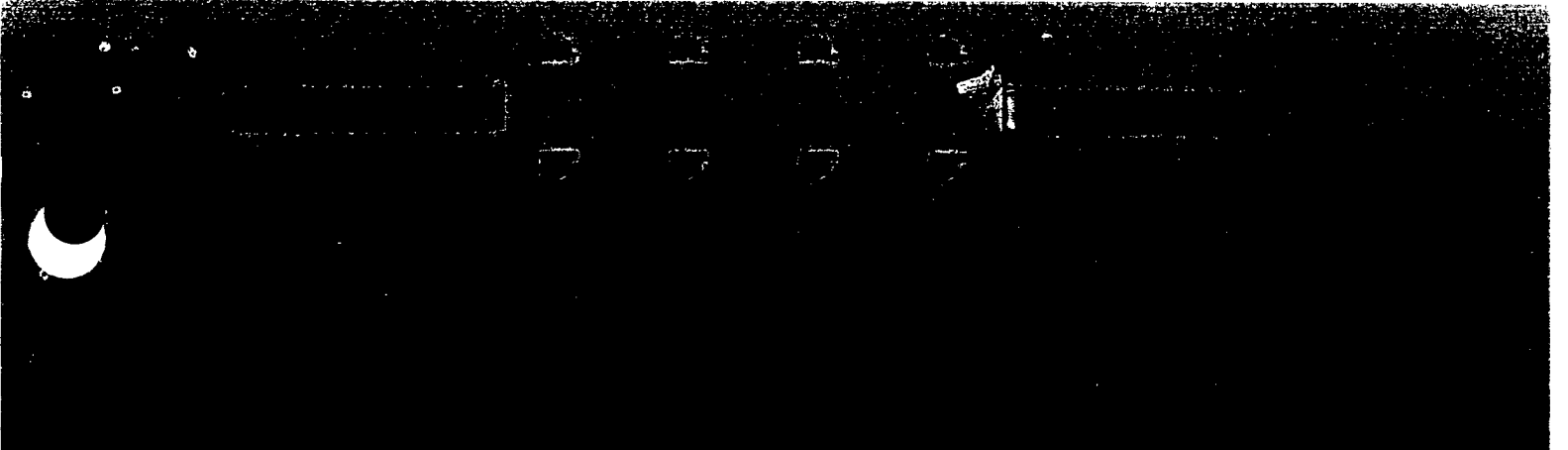
Diameter of tank is 52 inches with a 2 inch man hole rise.

The tank is parralel with Route # 32

From the southerly center end of tank to the south west corner of the gate house is 10.3 ft.

From the northerly center end of tank to the south west corner of gate is 6 ft.

Tank lenght is 6.2 ft.









PROJECT

OFFICE

OCT 2 9 1990

SECTION 10 #5, 6

DATE 14/SEP/90

FILE

TRANSMITTAL OF SHOP DRAWINGS, EQUIPMENT DATA, MATERIAL SAMPLES, MANUFACTURER'S CERTIFICATES OF COMPLIANCE (Read instructions on the reverse side prior to initiating this form)

Section I REQUEST FOR APPROVAL OF THE FOLLOWING ITEMS (This section will be initiated by the contractor)

TO: **Chind Design Branch**
US Army Corps of Engineers
424 Tamando Rd
02254-9149

FROM: **Hutchins Oil Co.**
5 Main St.
E. Templeton Ma. 01438

CONTRACT NO. **DACW33-90-C-0072**

TRANSMITTAL NO. **2**

PREVIOUS TRANS. NO. (if any) **1**

SPECIFICATION SEC. NO. (Cover only one section with each transmittal)

PROJECT TITLE AND LOCATION
Fuel Tank Replacement, Birch Hill Dam, Tully Lake Dam

ITEM NO.	DESCRIPTION OF ITEM SUBMITTED (Type, size, model number, etc.)	MFG. OR CONTR. CAT., CURVE DRAWING OR BROCHURE NO. (See instruction No. 8)	NO. OF COPIES	CONTRACT REFERENCE DOCUMENT		VARIATION (See instruction No. 9)	FOR C E USE CODE
				SPEC. PARA. NO.	DRAWING SHEET NO.		
13	leak monitoring system	CATA106 15000-4.1 cata106.	7	15000	3345		A
	Western Area Office - 2						
	Construction Directorate - 1						
	Design Division - 1						

NOV 1990 RECEIVED

62728293031-12345678910111213141516171819202122

SEP 1990 RECEIVED

12345678910111213141516171819202122232425262728293031

REMARKS

I certify that the above submitted items have been reviewed in detail and are correct and in strict conformance with the contract drawings and specifications except as otherwise stated.

NAME AND SIGNATURE OF CONTRACTOR
Edward J. Lucey

Section II APPROVAL ACTION

NAME, TITLE AND SIGNATURE OF AUTHORITY
John F. Craig, Chief, Design Division

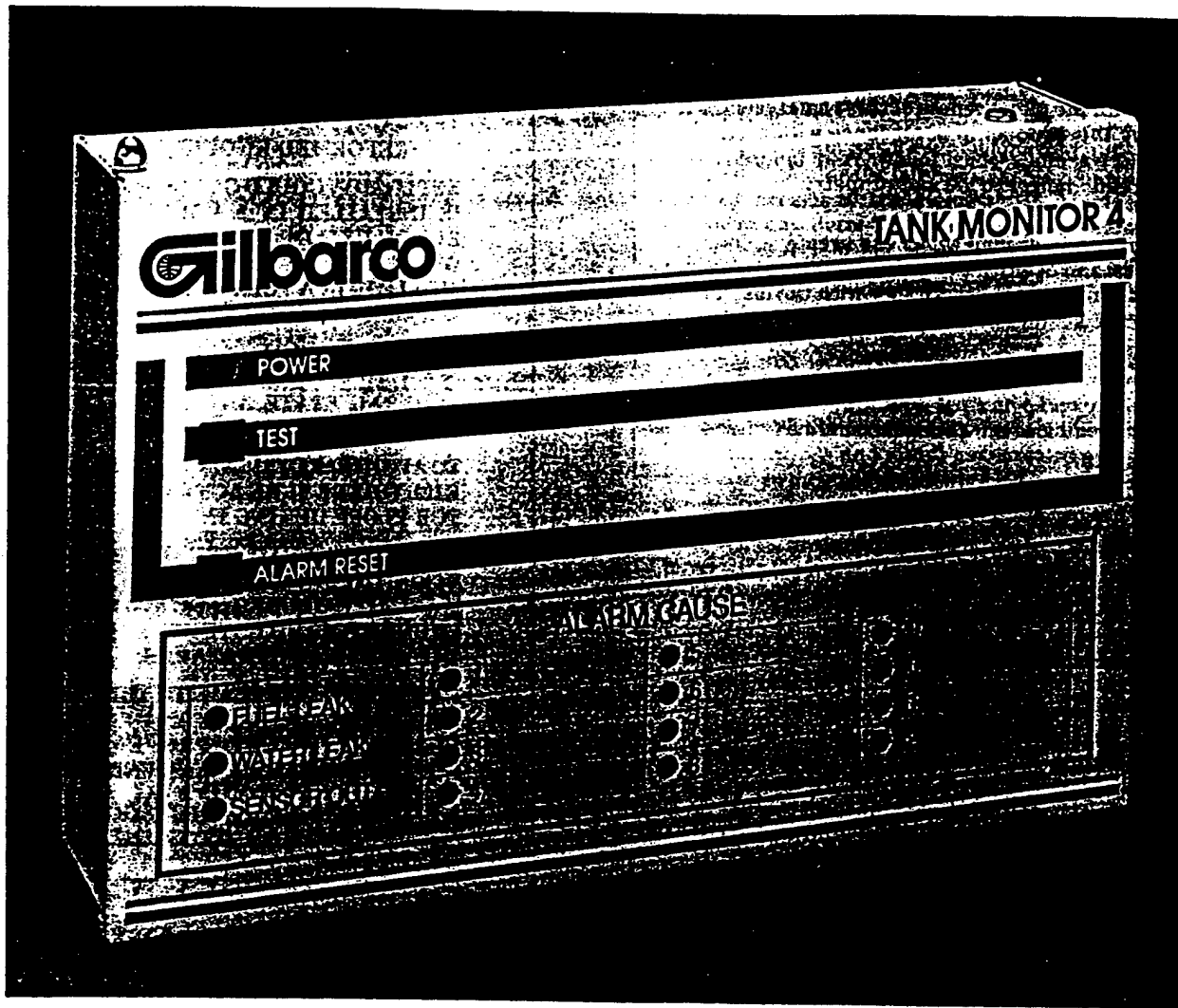
DATE
OCT 23 1990

ENCLOSURES RETURNED (List by Item No.)

EDITION OF JUL 81 IS OBSOLETE (Proponent: DAEN:ECC-Q)

ENG FORM 4025, Oct 84 SHEET OF

TANK MONITOR 4



<input checked="" type="checkbox"/>	A	Approved		D	Will be returned by separate correspondence
<input type="checkbox"/>	B	Approved except as noted, resubmission not required		E	Disapproved. See attached sheet
<input type="checkbox"/>	C	Approved, except as noted, resubmission required		F	Approval action not required

Gilbarco Inc. 7300 W. Friendly Ave. Greensboro, NC 27420
 CORPS OF ENGINEERS, NEW ENGLAND DIVISION
 CHECKED BY: *[Signature]* DATE: OCT 23 1990
 NOTE FOR CONTRACTOR - IMPORTANT!
 DIMENSIONS AND QUANTITIES HAVE NOT BEEN CHECKED. SEE PARAGRAPH 15 OF DRAWINGS OF THE SPECIFICATIONS AS TO LIMITATIONS OF THIS APPROVAL AND RESPONSIBILITY OF THE CONTRACTOR.

7300 W. Friendly Ave. Greensboro, NC 27420
1 MARCH 89

Site Preparation and Installation Manual

Tank Monitor 4

SECTION 2. SITE PREPARATION

WARNING: IN INSTALLATION OF THIS PRODUCT, COMPLY WITH THE NATIONAL ELECTRICAL CODE; FEDERAL, STATE, AND LOCAL CODES; AND OTHER APPLICABLE SAFETY CODES.

WARNING: TO PROTECT YOURSELF AND OTHERS FROM BEING STRUCK BY VEHICLES DURING WORK, BLOCK OFF YOUR WORK AREA DURING INSTALLATION OR SERVICE.

FAILURE TO COMPLY WITH THESE WARNINGS COULD RESULT IN DEATH, SERIOUS PERSONAL INJURY, PROPERTY LOSS, AND EQUIPMENT DAMAGE.

A. SENSOR RISER PIPE INSTALLATION. (See Figures 1 and 2 for dimensions and installation requirements.)

Note: If the tank is at a tilt, install the sensor in the low end of the tank.

1. Standard Procedures for installing a fill pipe can be used. Instructions are based on a 2-inch riser pipe.
2. If the tank is buried, excavate the portion that contains the bungs available to accept a riser pipe.
3. Remove the plug from the hole. Then, install the riser pipe in the hole. The top of the riser must either have a 2-inch -14 NPT pipe thread or accept a standard Schedule 40 2-inch - 14 NPT male adapter ring (as supplied in Gilbarco Kit No. Q12312-01). Ensure that there is enough clearance between the top of the riser and the manhole cover to allow room for the 2-wire cable supplied with the sensor.

Note: Gilbarco Riser Cap Kit No. Q12312-01 can be used with either threaded or unthreaded riser pipes.

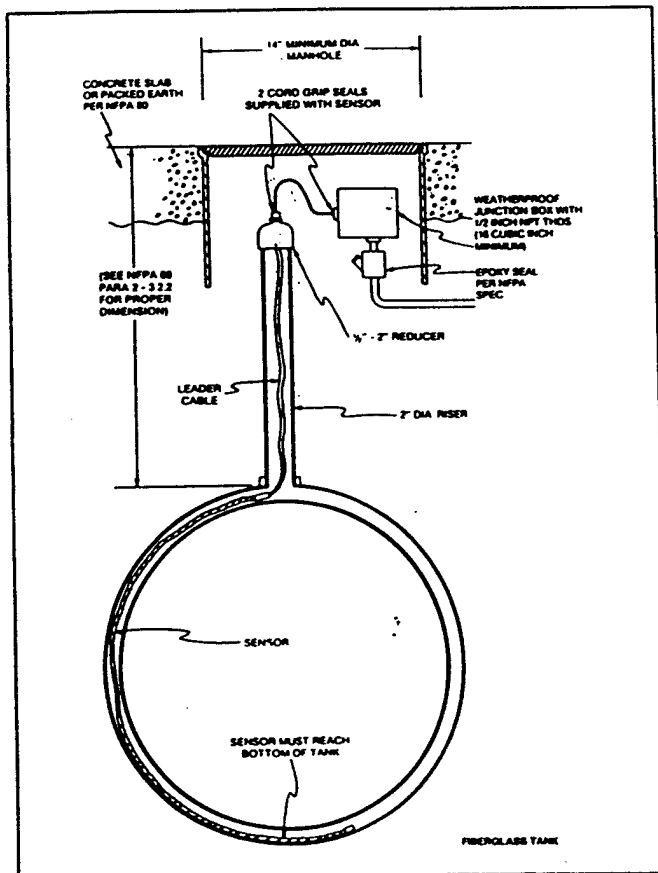


Figure 1. Sensor Dimensions and Installation Requirements
— Fiberglass Tank

4. Install a standard adapter ring and/or pipe cap on the riser pipe.

Note: If the threaded adapter ring is used, install with proper adhesive (i.e., TBC cement). Use thread sealer, NOT ADHESIVE, when installing the riser cap.

B. MONITOR LOCATION SELECTION.

WARNING: IMPROPER SYSTEM OPERATION COULD RESULT IN UNDETECTED POTENTIAL ENVIRONMENTAL AND HEALTH HAZARDS IF SENSOR-TO-MONITOR WIRE RUNS EXCEED 1,000 FEET. RUNS OVER 1,000 FEET ARE NOT UL APPROVED FOR THIS APPLICATION. SENSOR-TO-MONITOR WIRE MUST NOT EXCEED 1,000 FEET.

WARNING: EXPLOSION COULD OCCUR IF THE MONITOR IS INSTALLED IN A VOLATILE, COMBUSTIBLE OR EXPLOSIVE (CLASS I, DIVISION I OR DIVISION II) ATMOSPHERE. DO NOT INSTALL MONITOR IN A VOLATILE, COMBUSTIBLE OR EXPLOSIVE ATMOSPHERE.

FAILURE TO COMPLY WITH THESE WARNINGS COULD RESULT IN DEATH, SERIOUS PERSONAL INJURY, PROPERTY LOSS, AND EQUIPMENT DAMAGE.

1. Select a mounting location on the inside wall of an enclosed building. Be sure the monitor will be protected from severe vibration, extremes in temperature and humidity, rain, and other conditions which could harm the equipment. In addition, consider the ease of routing interconnection conduit and power conduit when selecting location for mounting the monitor.

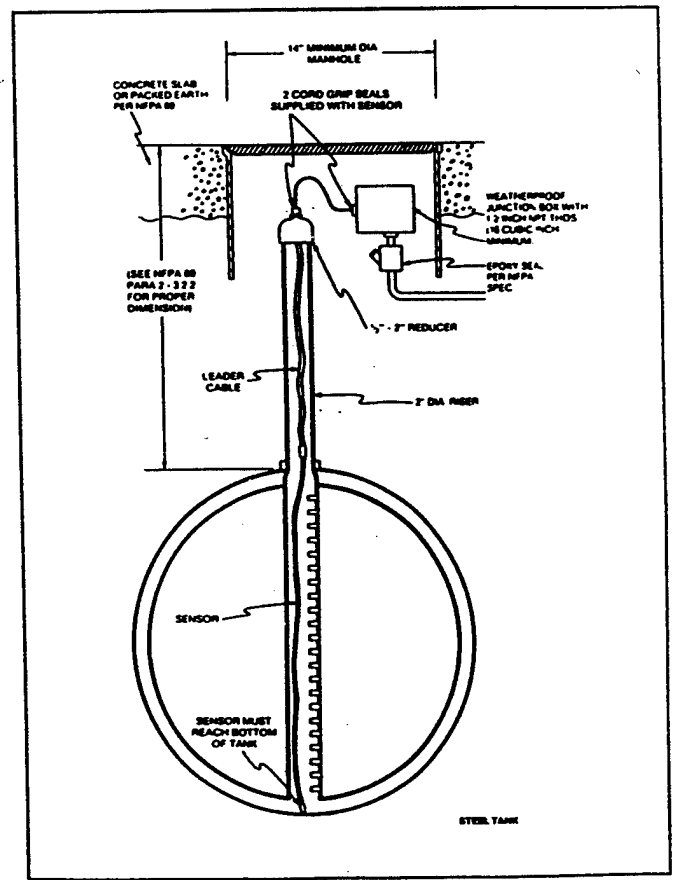


Figure 2. Sensor Dimensions and Installation Requirements
— Steel Tank

C. INSIDE CONDUIT INSTALLATION.

1. Install 1/2-inch rigid metal conduit or raceway for monitor power from the power panel to the monitor location. Conduit must align with the designated power knockout as shown in Figure 3. Power wiring must be installed in a separate conduit from sensor wiring.
2. Install a junction box to accommodate the sensor wiring as shown in Figure 4.
3. Run rigid metal conduit for sensor wiring from the monitor to the sensor wiring junction box as shown in Figure 4. Conduit must enter the monitor *where knockouts are provided*. No other conduit entry is permitted. Always keep sensor wires in a separate conduit or trough from all other wiring.

WARNING: EXPLOSION COULD OCCUR IF OTHER WIRES SHARE TANK MONITOR 4 SENSOR WIRE CONDUITS OR WIRING TROUGHS. CONDUITS AND WIRING TROUGHS FROM SENSORS TO THE MONITOR MUST NOT CONTAIN ANY OTHER WIRES.

WARNING: EXPLOSION AND/OR EQUIPMENT DAMAGE COULD OCCUR IF CONDUITS DO NOT ENTER THE MONITOR THROUGH THEIR DESIGNATED PRE-FORMED KNOCKOUTS.

FAILURE TO COMPLY WITH THESE WARNINGS COULD RESULT IN DEATH, SERIOUS PERSONAL INJURY, PROPERTY LOSS, AND EQUIPMENT DAMAGE.

4. Wiring between the sensors and the monitor is designed such that electrical power to the sensor wires is limited so that there is insufficient energy present to ignite the fuel. To maintain this safety feature, sensor wires must be installed in separate conduits from all other wiring. Never run these wires in the same conduit or wiring trough as power wires.

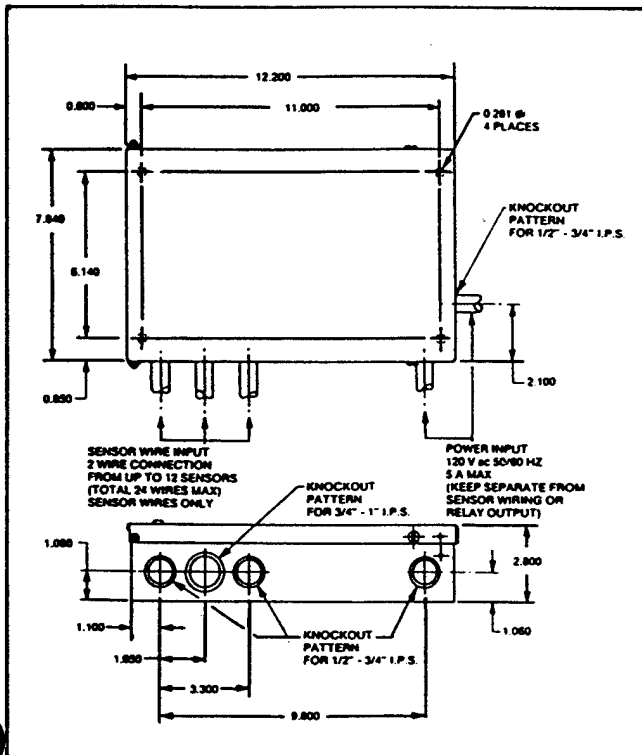


Figure 3. Monitor Dimensions and Installation Requirements

D. SENSOR CONDUIT INSTALLATION. (See Figure 4, "Tank Monitor 4 Wiring Installation Diagram.")

WARNING: SENSOR-TO-MONITOR WIRE MUST NOT EXCEED 1,000 FEET. IMPROPER SYSTEM OPERATION COULD RESULT IN INACCURATE INVENTORY CONTROL OR UNDETECTED POTENTIAL ENVIRONMENTAL AND HEALTH HAZARDS IF SENSOR-TO-MONITOR WIRE RUNS EXCEED 1,000 FEET. RUNS OVER 1,000 FEET ARE NOT UL APPROVED FOR THIS APPLICATION.

1. Dig trenches as necessary to install conduit from the monitor to each sensor location. Sensor wiring must enter the monitor through the knockouts located at the bottom left-hand side of the monitor case. (See Figure 3.)
2. Lay 1/2-inch rigid metal conduit from each sensor junction box to the sensor junction box or wiring trough located inside the building.

WARNING: EXPLOSION COULD OCCUR IF OTHER WIRES SHARE TANK MONITOR 4 SENSOR WIRE CONDUITS OR WIRING TROUGHS. CONDUITS AND WIRING TROUGHS FROM SENSORS TO THE MONITOR MUST NOT CONTAIN ANY OTHER WIRES.

Lay a single 3/4-inch rigid metal conduit from the junction box or wiring trough to the Tank Monitor 4 sensor location.

3. The conduit can enter the manhole through the bottom or the side, but the end of the conduit should be high enough to reduce the chance of water covering the junction box during heavy rain.
4. Install 1/2-inch rigid metal conduit or raceway for monitor power from the power panel to the monitor location. Conduit must align with the designated power knockout as shown in Figure 3. Power wiring must be installed in a separate conduit from sensor wiring.

E. SENSOR JUNCTION BOX INSTALLATION. (See Figures 1 and 2.) Install a weatherproof electrical junction box with gasketed cover on the end of each conduit run at the sensor locations. Gasketing or sealing compound must be used at each entry to the junction box to ensure a waterproof junction. The interior of the junction box must be a minimum of 16 cubic inches. Use one of the following approved units or equivalent:

Manufacturer: Appleton Electric Co.
1701 W. Wellington Av.
Chicago, IL 60657

Phone: (312) 327-7200

Description	Part No.	Qty.
Junction Box	JBDX-75	1
Cover, Junction Box	JBK-B	1
Gasket, Junction Box	JB-GK-V	1

Manufacturer: Crouse-Hinds Co.
Syracuse, NY 13221

Phone: (315) 477-7000

Description	Part No.	Qty.
Junction Box	GRFX-139	1
Cover, Junction Box	GRF-10	1
Gasket, Junction Box	GASK-643	1

SECTION 10 # 5, 6

TRANSMITTAL OF SHOP DRAWINGS, EQUIPMENT DATA, MATERIAL SAMPLES, OR MANUFACTURER'S CERTIFICATES OF COMPLIANCE

(Read instructions on the reverse side prior to initiating this form)

Section I REQUEST FOR APPROVAL OF THE FOLLOWING ITEMS (This section will be initiated by the contractor)

DATE: 31 July 90

TO: U.S. Army Corps of Engineers
TULLY LAKE DAM

FROM: HUBTALA OIL COMPANY
5 MAIN, ST.
EAST TEMPLETON, MA 01438

CONTRACT NO. DARW 33-90-C-0072

TRANSMITTAL NO. 3

PREVIOUS TRANS. NO. (If any) N/A

SPECIFICATION SEC. NO. (Cover only one section with each transmittal)

PROJECT TITLE AND LOCATION: REC TRAK REPLACEMENT, Birch Hill Dam, Tully Lake Area

ITEM NO.	DESCRIPTION OF ITEM SUBMITTED (Type, size, model number, etc.)	MFG. OR CONTR. CAT., CURVE DRAWING OR BROCHURE NO. (See instruction No. 8)	NO. OF COPIES	CONTRACT REFERENCE DOCUMENT		VARIATION (See instruction No. 9)	FOR CE USE CODE
				SPEC. PARA. NO.	DRAWING SHEET NO.		
5	Quality Control Representative		7	01400-2	N/A		
6	Quality Control Daily Report		7	01400-3	N/A		
7	Data Reporting		7	01400-5.3	N/A		
8	Accident Prevention Plan		7	01900-4	N/A		
9	Demolition Procedures		7	03050-2	N/A		

REMARKS

I certify that the above submitted items have been reviewed in detail and are correct and in strict conformance with the contract drawings and specifications except as otherwise stated.

NAME AND SIGNATURE OF CONTRACTOR: *[Signature]*

Section II APPROVAL ACTION

INCLOSURES RETURNED (List by Item No.)

NAME, TITLE AND SIGNATURE OF APPROVING AUTHORITY: _____ DATE: _____

Dope and Lacquer Thinner - CSP Inc. Conroe TX 77305

Trichloroethane - Northvale, NJ

Enamel Thinner - CSP Inc. Conroe TX 77305

Enamel Reducer - Inmont Corp Detroit MI 48210

Turpentine - WM Barr & Co Memphis, TN 38113

Gear Oil - Mobile New York, New York

Motor Oil - Amalie Bradford, PA 16701

Ford Trax, Michigan 48084

Quaker State Corp. Oil City PA 16301

Sunoco Philadelphia PA 19103-1699

Transmission Fluid - Amoco Chicago ILLinois

Sunoco Philadelphia PA 19103-1699

Amalie Bradford PA 16701

SilkScreen Chemicals - Metra Chem Corp

792 Hartford Pike

Shrewsbury MA 01545

Wax & Silicone Remover BASF Corp Dearborn MI 48124

Grand Rapids MI 49509

Belvidere NJ 07823

• Rosal Cans Chemicals - United, Addison, IL 60101

Zep Atlanta Georgia 30301

• Krylon, Borden Inc Columbus Ohio 43215

Sapolin, Brooklyn NY 11231

Jet, Neodesha, Kansas 66757

Flare, Bell Chemical Co. 411 North Watcott Ave
Chicago Ill 60622

Inslx - Inslx Prod. Corp., 115 Woodworth Ave
Yonkers NY

Antifreeze - The Old World Trading Co Inc.

Des Plaines, IL 60016

Windshield Fluid - Penn Pride S.A.V. Ind Inc.

Leominster MASS 01453

TradCo Corp 1081 Rosemary Blvd

Akron OH 44308

Boundary Point - Nelson Paint Co., Iron Mountain Michigan 49801

Montgomery, Alabama 36108

McMinnville, Oregon 97128

Southern Coatings Inc. Sumter South Carolina 29150

Slidell, Louisiana 70459

SilkScreen Paint - Naz Dar, Chicago, Ill, 60622

Paint Oil Base - Sherwin Williams Co. Cleveland Ohio 44101

Muralo Co. Inc. Bayonne New Jersey 07002

Thermalox, Dampney Co Inc. 85 Paris St. Everett MA 02149

GSA

Paint Latex - Duron Inc. Beltsville, MD 20705

Tru Test Chicago Ill 60614

Servisstar Butler Pennsylvania 16001

Aerosol Cans Paint - Srrayon Products Inc. Bedford Heights
Ohio 44146 & Anaheim California 92806

So Sure, LHB industries Berkeley, MO 63134

Illinois Bronze Lake Zurich Illinois 60047

Ford Dearborn MI 48121

Glidden Cleveland, Ohio 44115

Super Supreme Traffic Paint, Fox Valley 122 South Northwest
Highway Cary, IL 60013

Tempo Products Co Cleveland, Ohio 44139

HAZARDOUS MATERIALS INVENTORY SHEET

DATE 12/17/91

BUILDING NAME UTILITY BLDG. CODE _____

WORK AREA (ROOM) LOCK UP ROOM CODE _____

PRODUCT NAME TURTLE WAX NSN _____

MANUFACTURER NAME TURTLE WAX INC.
CHICAGO, ILL. 60638

FORM: LIQUID _____ SOLID _____ GAS _____ OTHER PASTE USE WAXING VEHICLES

USER ANYONE

QUANTITIES: LBS 6.0 / * GAL _____ / * CUF _____ / *

MSDS ON HAND? YES / NO * LAST INVENTORY

PRODUCT NAME DIESEL FUEL ANTI-GEL NSN _____

MANUFACTURER NAME RADIATOR SPECIALTY CO.

FORM: LIQUID X SOLID _____ GAS _____ OTHER _____ USE _____

USER ANYONE CODE _____

QUANTITIES: LBS _____ / * 58 GAL _____ / * CUF _____ / *

MSDS ON HAND? YES / NO * LAST INVENTORY

PRODUCT NAME WAX STRIPPER NSN _____

MANUFACTURER NAME GROW GROUP
CULVER CITY, CA. 90230

FORM: LIQUID X SOLID _____ GAS _____ OTHER _____ USE STRIP WAX BUILDUP

USER ANYONE CODE _____

QUANTITIES: LBS _____ / * GAL _____ / * CUF _____ / *

MSDS ON HAND? YES / NO * LAST INVENTORY

- Include office supplies i.e. toners, whiteout, etc.

HAZARDOUS MATERIALS INVENTORY SHEET

DATE 12/17/91

BUILDING NAME UTILITY BLDG. CODE _____

WORK AREA (ROOM) LOCK UP ROOM CODE _____
PROTECTIVE COATING AND

PRODUCT NAME BEAUTIFIER COMPOUND NSN 8030011032868

MANUFACTURER NAME AEROFILL TECHNOLOGY INC
225 INDUSTRIAL PARK DRIVE
SULLIVAN, MO. 63080

FORM: LIQUID SOLID _____ GAS _____ OTHER _____ USE POLISH.

USER ANYONE

QUANTITIES: LBS _____ / * 1.27 GAL _____ / * _____ CUF _____ / *

MSDS ON HAND? YES / NO * LAST INVENTORY

PRODUCT NAME SCOURING POWDER NSN 7930-00-721-8592

MANUFACTURER NAME FITZPATRICK BROS
CHICAGO, IL 60612

FORM: LIQUID _____ SOLID _____ GAS _____ OTHER POWDER USE CLEANING.

USER _____ CODE _____

QUANTITIES: LBS _____ / * 4.43 GAL _____ / * _____ CUF _____ / *

MSDS ON HAND? YES / NO * LAST INVENTORY

POLISH PLASTIC TYPE

PRODUCT NAME 1 LIQUID. NSN _____

MANUFACTURER NAME AIN PLASTICS
SOUTHFIELD MIN 48037

FORM: LIQUID SOLID _____ GAS _____ OTHER _____ USE POLISH PLASTICS

USER ANYONE CODE _____

QUANTITIES: LBS _____ / * 1.8 GAL _____ / * _____ CUF _____ / *

MSDS ON HAND? YES / NO * LAST INVENTORY

- Include office supplies i.e. toners, whiteout, etc.

21 November 1991

HAZARDOUS MATERIALS INVENTORY SHEET

DATE 12/17/91

BUILDING NAME UTILITY BLDG. CODE _____

WORK AREA (ROOM) LOCK UP ROOM CODE _____

PRODUCT NAME CAR WASH. NSN _____

RADIATOR SPECIALTY CO.
MANUFACTURER NAME CHARLOTTE, NC. 28234-6080

FORM: LIQUID _____ SOLID _____ GAS _____ OTHER POWDER USE _____

USER ANYONE

QUANTITIES: LBS 1.0 / * _____ GAL _____ / * _____ CUF _____ / * _____

MSDS ON HAND? YES / (NO) * LAST INVENTORY

PRODUCT NAME WASP & HORNET KILLER NSN _____

SHERWIN WILLIAMS
MANUFACTURER NAME BEDFORD HEIGHTS, OH 44146

FORM: LIQUID _____ SOLID _____ GAS _____ OTHER SPRAY USE _____

USER ANYONE CODE _____

QUANTITIES: LBS _____ / * 55 GAL _____ / * _____ CUF _____ / * _____

MSDS ON HAND? YES / (NO) * LAST INVENTORY

PRODUCT NAME THRUST QUICK STARTING FLUID NSN _____

RADIATOR SPECIALTY COMPANY.
MANUFACTURER NAME CHARLOTTE, NC. 28234

FORM: LIQUID _____ SOLID _____ GAS _____ OTHER SPRAY USE _____

USER ANYONE CODE _____

QUANTITIES: LBS _____ / * 31 GAL _____ / * _____ CUF _____ / * _____

MSDS ON HAND? YES / (NO) * LAST INVENTORY

- Include office supplies i.e. toners, whiteout, etc.

HAZARDOUS MATERIALS INVENTORY SHEET

DATE 12/17/91

BUILDING NAME UTILITY BLDG. CODE _____

WORK AREA (ROOM) LOCK UP ROOM CODE _____

PRODUCT NAME GENERAL PURPOSE DETERGENT NSN 7930-00-926-7386

MANUFACTURER NAME LIGHTHOUSE FOR THE BLIND

FORM: LIQUID SOLID _____ GAS _____ OTHER _____ USE CLEAVER

USER LABORER

QUANTITIES: LBS _____ / * 1.1 GAL _____ / * _____ CUF _____ / *

MSDS ON HAND? YES / NO * LAST INVENTORY

PINE OIL

PRODUCT NAME DISINFECTANT DETERGENT NSN 6840-00-687-7904

MANUFACTURER NAME LIGHTHOUSE FOR THE BLIND

FORM: LIQUID SOLID _____ GAS _____ OTHER _____ USE _____

USER LABORER CODE _____

QUANTITIES: LBS _____ / * .25 GAL _____ / * _____ CUF _____ / *

MSDS ON HAND? YES / NO * LAST INVENTORY

NOW

PRODUCT NAME VANDALISM MARK REMOVER NSN _____

MANUFACTURER NAME HOLLISTON, MA. 01746
Now CHEMICAL CORPORATION
P.O. BOX 522

FORM: LIQUID _____ SOLID _____ GAS _____ OTHER SPRAY USE _____

USER _____ CODE _____

QUANTITIES: LBS 4.0 / * _____ GAL _____ / * _____ CUF _____ / *

MSDS ON HAND? YES / NO * LAST INVENTORY

- Include office supplies i.e. toners, whiteout, etc.

21 November 1991

HAZARDOUS MATERIALS INVENTORY SHEET

DATE 12/17/91

BUILDING NAME UTILITY BLDG. CODE _____

WORK AREA (ROOM) LOCK UP ROOM CODE _____

PRODUCT NAME AIR FRESHENER NSN _____
HYSAN CORP.

MANUFACTURER NAME DES PLAINES IL. 60018

FORM: LIQUID _____ SOLID _____ GAS _____ OTHERS MAY USE _____

USER LABORER

QUANTITIES: LBS _____ / * .06 GAL _____ / * _____ CUF _____ / *

MSDS ON HAND? YES / (NO) * LAST INVENTORY

PRODUCT NAME GLASS CLEANER NSN 7930-00-664-6910
LIGHTHOUSE FOR THE BLIND

MANUFACTURER NAME HOUSTON, TX 77019

FORM: LIQUID X SOLID _____ GAS _____ OTHER _____ USE _____

USER _____ CODE _____

QUANTITIES: LBS _____ / * .62 GAL _____ / * _____ CUF _____ / *

MSDS ON HAND? YES / (NO) * LAST INVENTORY

PRODUCT NAME WINDSHIELD CLEANING COMPOUND NSN _____
MIDWEST POLYCHEM, LTD

MANUFACTURER NAME MELROSE PARK, IL. 60160

FORM: LIQUID X SOLID _____ GAS _____ OTHER _____ USE _____

USER ANYONE CODE _____

QUANTITIES: LBS _____ / * .06 GAL _____ / * _____ CUF _____ / *

MSDS ON HAND? YES / (NO) * LAST INVENTORY

- Include office supplies i.e. toners, whiteout, etc.

21 November 1991

HAZARDOUS MATERIALS INVENTORY SHEET

DATE 12/17/91

BUILDING NAME UTILITY OFFICE CODE _____

WORK AREA (ROOM) LOCK UP ROOM CODE _____

PRODUCT NAME GERMICIDAL SPRAY & CLEANER NSN _____
BRULIN & CO. INC.

MANUFACTURER NAME WESTWOOD, NJ. 07675

FORM: LIQUID _____ SOLID _____ GAS _____ OTHERS SPRAY USE _____

USER LABORER

QUANTITIES: LBS 6.1/2 / * _____ GAL _____ / * _____ CUF _____ / * TOILET CLEANER

MSDS ON HAND? YES / (NO) * LAST INVENTORY

PRODUCT NAME AIR FRESHERNER NSN _____
FULD-STALFORD INC.

MANUFACTURER NAME HAVRE de GRACE, MD. 21078

FORM: LIQUID X SOLID _____ GAS _____ OTHER SPRAY USE _____

USER LABORER CODE _____

QUANTITIES: LBS _____ / * .06 GAL _____ / * _____ CUF _____ / *

MSDS ON HAND? YES / (NO) * LAST INVENTORY

PRODUCT NAME ELMER'S GLUE NSN _____
BORDEN INC.

MANUFACTURER NAME DEPT. CP COLUMBUS OHIO 43215

FORM: LIQUID X SOLID _____ GAS _____ OTHER _____ USE _____

USER _____ CODE _____

QUANTITIES: LBS _____ / * .06 GAL _____ / * _____ CUF _____ / *

MSDS ON HAND? YES / (NO) * LAST INVENTORY

- Include office supplies i.e. toners, whiteout, etc.

HAZARDOUS MATERIALS INVENTORY SHEET

DATE 12/17/91

BUILDING NAME UTILITY BLDG CODE _____

WORK AREA (ROOM) LOCK UP ROOM CODE _____

PRODUCT NAME INSECT REPELLENT NSN _____

STAR MARK

MANUFACTURER NAME CLEARWATER, FL. 34621-0260

FORM: LIQUID SOLID _____ GAS _____ OTHER _____ USE INSECT REPELLENT

USER ANYONE

QUANTITIES: LBS _____ / * .15 GAL _____ / * CUF _____ / *

MSDS ON HAND? YES / NO * LAST INVENTORY

HALT

PRODUCT NAME INSECT REPELLENT NSN _____

MAINTENANCE CHEMICAL CO.

MANUFACTURER NAME 101 MESSINA DR. BRAintree, MASS. 02184

FORM: LIQUID _____ SOLID _____ GAS _____ OTHER SPRAY USE _____

USER ANYONE

QUANTITIES: LBS _____ / * .10 GAL _____ / * CUF _____ / *

MSDS ON HAND? YES / NO * LAST INVENTORY

PRODUCT NAME D06 REPELLENT NSN _____

ANIMALS REPELLENT INC.

MANUFACTURER NAME GRIFFIN GEORGIA 30223

FORM: LIQUID SOLID _____ GAS _____ OTHER SPRAY USE TO REPELL D06S

USER ANYONE

QUANTITIES: LBS _____ / * X GAL _____ / * CUF _____ / *

MSDS ON HAND? YES / NO * LAST INVENTORY

- Include office supplies i.e. toners, whiteout, etc.

21 November 1991

HAZARDOUS MATERIALS INVENTORY SHEET

DATE 12/17/91

BUILDING NAME UTILITY BLDG. CODE _____

WORK AREA (ROOM) LOCK UP ROOM CODE _____

PRODUCT NAME DERMI-KLENE NSN _____

MANUFACTURER NAME DERMI-KLENE CO.
FULLERTOWN, CA. 92631

FORM: LIQUID _____ SOLID _____ GAS _____ OTHER CREME USE HAND SOAP

USER ANYONE

QUANTITIES: LBS 3.0 / * _____ GAL _____ / * _____ CUF _____ / * _____

MSDS ON HAND? YES / NO * LAST INVENTORY

PRODUCT NAME HAND CLEANER NSN _____

MANUFACTURER NAME MAKOR PRODUCTS MANUFACTURING CO.
RIVERHEAD, NY 11901

FORM: LIQUID _____ SOLID _____ GAS _____ OTHER CREME USE HAND CLEANER

USER ANYONE CODE _____

QUANTITIES: LBS 2.0 / * _____ GAL _____ / * _____ CUF _____ / * _____

MSDS ON HAND? YES / (NO) * LAST INVENTORY

PRODUCT NAME INSECT REPELLENT NSN 6840-00-753-4963

MANUFACTURER NAME AEROSOL COMPANY INC.
NEODESHA, KANSAS 66757

FORM: LIQUID X SOLID _____ GAS _____ OTHER _____ USE INSECT REPELLENT

USER ANYONE CODE _____

QUANTITIES: LBS _____ / * .1 GAL _____ / * _____ CUF _____ / * _____

MSDS ON HAND? YES / (NO) * LAST INVENTORY

- Include office supplies i.e. toners, whiteout, etc.

21 November 1991

HAZARDOUS MATERIALS INVENTORY SHEET

DATE 12/17/91

BUILDING NAME UTILITY BLDG. CODE

WORK AREA (ROOM) LOCK UP ROOM CODE
MCS

PRODUCT NAME INVISIBLE PESTICIDE NSN

MANUFACTURER NAME MAINTENANCE CHEMICAL SUPPLY
101 MESSINA DRIVE
BRAINTREE, MASS. 02184

FORM: LIQUID X SOLID GAS OTHER USE PESTICIDE

USER LABORER

QUANTITIES: LBS 1*.43 GAL 1* CUF 1*

MSDS ON HAND? YES / NO * LAST INVENTORY

PRODUCT NAME INSECT SPRAY NSN

MANUFACTURER NAME THE SUPPLY COMPANY, INC.
P.O. BOX E 223
DEDHAM, MA. 02026-0904

FORM: LIQUID X SOLID GAS OTHER SPRAY USE INSECT SPRAY

USER ANYONE CODE

QUANTITIES: LBS 1*.10 GAL 1* CUF 1*

MSDS ON HAND? YES / NO * LAST INVENTORY

INSECTICIDE

PRODUCT NAME D-TRANS NSN 6840-01-067-2137

MANUFACTURER NAME BULK CHEMICALS DISTRIBUTORS, INC.
NO. 1 INDUSTRIAL LANE
GRETNA, LA. 70053

FORM: LIQUID X SOLID GAS OTHER SPRAY USE INSECTICIDE

USER ANYONE CODE

QUANTITIES: LBS 1*.77 GAL 1* CUF 1*

MSDS ON HAND? YES / NO * LAST INVENTORY

- Include office supplies i.e. toners, whiteout, etc.

HAZARDOUS MATERIALS INVENTORY SHEET

DATE 12/17/91

BUILDING NAME UTILITY BLDG. CODE _____

WORK AREA (ROOM) LOCK UP ROOM CODE _____

PRODUCT NAME TOILET DEODERANT CAKE NSN 684-00-246-643B

MANUFACTURER NAME _____

FORM: LIQUID _____ SOLID GAS _____ OTHER _____ USE URINAL DEODERANT

USER LABORER

QUANTITIES: LBS 2.0 / * _____ GAL _____ / * _____ CUF _____ / *

MSDS ON HAND? YES / NO * LAST INVENTORY

TOILET DEODERANT

PRODUCT NAME TYPE 2 CAKE NSN 6840-00-664-6610

MANUFACTURER NAME _____

FORM: LIQUID _____ SOLID GAS _____ OTHER _____ USE URINAL DEODERANT

USER LABORER

QUANTITIES: LBS 1.0 / * _____ GAL _____ / * _____ CUF _____ / *

MSDS ON HAND? YES / NO * LAST INVENTORY

AD 105

PRODUCT NAME DEODORIZING INSECT SPRAY NSN _____
MALTER INTERNATIONAL CORPORATION

MANUFACTURER NAME P.O. BOX 6099 NEW ORLEANS, LOUISIANA 70147

FORM: LIQUID SOLID _____ GAS _____ OTHER SPRAY USE INSECT SPRAY

USER LABORER

QUANTITIES: LBS _____ / * 1.25 GAL _____ / * _____ CUF _____ / *

MSDS ON HAND? YES / NO * LAST INVENTORY

- Include office supplies i.e. toners, whiteout, etc.

HAZARDOUS MATERIALS INVENTORY SHEET

DATE 12/17/91

BUILDING NAME UTILITY BLDG CODE _____

WORK AREA (ROOM) LOCK UP ROOM CODE _____

PRODUCT NAME GREAT HAND CLEANER NSN _____

MANUFACTURER NAME CLEVELAND COTTON PRODUCTS

FORM: LIQUID SOLID _____ GAS _____ OTHER _____ USE HAND CLEANER

USER ANYONE AT PROJECT

QUANTITIES: LBS _____ / * 3.0 GAL _____ / * CUF _____ / *

MSDS ON HAND? YES / NO * LAST INVENTORY

PRODUCT NAME PREEN WAX NSN 3160051400

MANUFACTURER NAME THE KIW POLISH CO. POTTSTOWN, PENN. 19464

FORM: LIQUID SOLID _____ GAS _____ OTHER _____ USE FLOOR WAX

USER LABORER CODE _____

QUANTITIES: LBS _____ / * GAL 1.0 / * CUF _____ / *

MSDS ON HAND? YES / NO * LAST INVENTORY

PRODUCT NAME GENERAL PURPOSE DETERGENT NSN 7930-00-177-5243

MANUFACTURER NAME LIGHTHOUSE FOR THE BLIND

FORM: LIQUID SOLID _____ GAS _____ OTHER _____ USE CLEANING

USER LABORER CODE _____

QUANTITIES: LBS _____ / * GAL 3.0 / * CUF _____ / *

MSDS ON HAND? YES / NO * LAST INVENTORY

- Include office supplies i.e. toners, whiteout, etc.

HAZARDOUS MATERIALS INVENTORY SHEET

DATE 12/17/91

BUILDING NAME UTILITY BUILDING CODE _____

WORK AREA (ROOM) LOCK UP ROOM CODE _____

PRODUCT NAME DETERGENT (WATER SOLUBLE) NSN _____
OCTAGON PROCESS INC.

MANUFACTURER NAME EDGEWATER, NJ.

FORM: LIQUID SOLID _____ GAS _____ OTHER _____ USE CLEANING, WASHING

USER LABORER

QUANTITIES: LBS 1* GAL .5* CUF 1*

MSDS ON HAND? YES / NO * LAST INVENTORY

PRODUCT NAME SOAP BORAX (POWDERED) NSN 8520-00-270-0065
CONCORD CHEMICAL CO. INC.

MANUFACTURER NAME CAMDEN, NJ. 08105

FORM: LIQUID _____ SOLID _____ GAS _____ OTHER POWDER USE CLEANING

USER LABORER CODE _____

QUANTITIES: LBS 2.0* GAL _____* CUF 1*

MSDS ON HAND? YES / NO * LAST INVENTORY

H1-TOP

PRODUCT NAME WINDOW CLEANER NSN _____
FEDERATED FOODS

MANUFACTURER NAME PARK RIDGE ILL 60068

FORM: LIQUID SOLID _____ GAS _____ OTHER _____ USE WINDOW CLEANER

USER LABORER CODE _____

QUANTITIES: LBS _____* GAL .125* CUF 1*

MSDS ON HAND? YES / NO * LAST INVENTORY

- Include office supplies i.e. toners, whiteout, etc.

Name of Product	Use	Composition	SECA 10 ~ 4 Hazard	Quantity on Hand	+3 Usable	Flammable	Yes/No	Quantity Used / Yr	Quantity Discarded / Yr
Dope and Lacquer Thinner	Lacquer Thinner	A-A-807B Cellulose-Nitrate	Toxic Flammable	13 gal	Yes	Yes		6 gal	6 gal
Trichloroethane	Clean Signs	UnKnown	" "	5 gal	Yes	Yes		5 gal	0 gal
Enamel Thinner	Thin Enamel	TT-T-306C TPZ	" "	11 gal	Yes	Yes		5 gal	2 gal
Enamel Reducer	Spraying Enamel	UnKnown	" "	2 gal	Yes	Yes		1 gal	0 gal
Turpentine	Making Signs	UnKnown	" "	22 gal	Yes	Yes		10 gal	5 gal
Insul X	UnKnown	UnKnown	UnKnown	2 qt's	Yes	Yes		0	0
gear Oil	gear Lube	UnKnown	UnKnown	4 gal	Yes	Yes		1 gal	0
Paint Oil Base	Misc.	UnKnown	Toxic Flammable	87 gal	Yes	Yes		25 gal	0
Paint Latex Base	Misc.	UnKnown	Toxic	20 gal	Yes	Yes		15 gal	0
Aerosol Cans Paint	Misc.	UnKnown	Toxic Flammable	118 ea.	Yes	Yes		75 ea	0
aerosol Cans Chemicals	Misc.	UnKnown	Toxic Flammable	33 ea.	Yes	Yes		70 ea	0
Anti Freeze	Freeze Protection	UnKnown	Toxic	11 gal	Yes	Yes		9 gals	9 gal
Gasoline	Fuel	UnKnown	Toxic Flammable	25 gal	Yes	Yes		200 gal	0 gal
Windshield Fluid	Freeze Protection	UnKnown	Toxic Flammable	13 gal	Yes	Yes		8 gal	0
Motor Oil	Lubrication	UnKnown	Toxic	8 gal	Yes	Yes		13 gal	10 gal
Transmission Fluid	Lubrication	UnKnown	Toxic	25 gal	Yes	Yes		2 gal	0
Foundry Paint	Mark Boundries	UnKnown	Toxic Flammable	25 gal	Yes	Yes		8 gal	0
Wkscreen Paint	Sign Making	UnKnown	Toxic Flammable	7 gal	Yes	Yes		2 qt's	0
Wkscreen Chemicals	Sign Making	UnKnown	Toxic Flammable	40 gal	Yes	Yes		10 gal	5 gal
Diesel Fuel	Tractor Fuel	UnKnown	Toxic Flammable	38 gal	Yes	Yes		150 gal	0
w/silicone Remover	Clean Signs	UnKnown	Toxic Flammable	1 gal	Yes	Yes		~ 12 gal	0

PAIN T LOCKER & HAZAR D WASTE BUILDINGS

Project: Tully