

PM

JUN 5 2002

June 5, 2002

P. Howard Flanders
Director, Waste Management Division
Agency of Natural Resources
103 South Main Street West Office Building
Waterbury, Vermont 05671-0404

RE: Response to Notice of Alleged Violation
Generator ID No. S-01-11-030

Dear Mr. Flanders,

The following statements are in response to your letter of May 3, 2002 and outline the actions taken for each of the alleged violations noted in the compliance evaluation inspection conducted at Standard Register Company on February 14, 2002:

7-10-02 (a), (c) Alleged Violation: Company information on file with the Vermont Agency of Natural Resources, Waste Management Division was not current.

Response: Vermont Notification of Regulated Waste Activity Form updated. (See attached.) Source Description updated. (See attached.)

7-20-02 (b) Alleged Violation: The Waste UV Wash, POSCO waste stream components had been incorrectly identified in documents provided to SRC's hazardous waste disposal firm.

Response: UV Wash profile corrected. See attached profile.

7-20-02 (c) Alleged Violations: Oily (VT02) wipes and sorbents accumulating on the service area loading dock prior to shipment for commercial laundering were stored neither as hazardous wastes nor in a manner meeting the requirements for exemption from management as a hazardous waste. Neither the container collecting full laundry bags of sorbents nor the bags themselves was labeled. Also, an open, unlabeled five-gallon pail of used sorbent pigns was observed on the loading dock.

Response: Oily wipes and sorbents stored in the loading dock area are labeled with a sign stating "Soiled Rags for Laundering" and are stored in closed bags in a closed cover container.

7-30-02 (c), (d) Alleged Violations: Two 55-gallon drums in the short term hazardous waste storage area labeled as containing a hazardous waste (VT02) Used Oil were observed to have accumulation start dates of 12/00 and 4/01 respectively.

Response: Drums are labeled "Used Oil" and are now part of a used oil for re-refining program and are coded as VT99. Drums are also labeled as a "Satellite Accumulation Container in a Short Term Storage Area". (New profile for used oil for re-refining attached.)

7-307(c)
7-309(c) Alleged Violation: Access to emergency communications equipment was not immediately available at the short-term hazardous waste storage area.

Response: Construction of new short-term hazardous waste storage area began on April 1, 2002 and is nearing completion. Emergency communications equipment is included in the new construction plan and is in the process of being installed. Construction completion date is June 30, 2002.

7-707(b) Alleged Violation: At the time of the inspection SRC did not have the Uniform hazardous Waste Manifest "Copy 3": Facility Mails to Generator" manifest copies, confirming delivery of shipments to a designated facility, for seven manifested hazardous waste shipments made during the period 10/11/2000 and 9/26/2001 and had not filed the required exception reports with the Agency.

Response: SRC has obtained all missing Copy 3 manifests for the above described period.

7-311(d)(1) Alleged Violation: No inventory of hazardous wastes in storage was available for review at the time of the inspection.

Response: The inventory of hazardous waste in storage is posted outside of the new hazardous waste room. In addition, a list of what can be stored in the hazardous waste room is included in our Emergency Contingency Plan.

7-311(c) Alleged Violation: The short term hazardous waste storage area was not identified by "Danger – Hazardous Waste Storage Area – Authorized Personnel Only" signs posted on either the interior or the exterior doors leading to its location on the loading dock off the plant's general service area.

Response: Signs are posted on the interior and exterior doors of the new hazardous waste storage room identifying it as a danger, hazardous waste storage area, authorized personnel only to be in the area.

7-311(c) Alleged Violation: An open and unlabeled, half-filled 5 gallon pail of used oil (hazardous waste code VT02) was observed in the short-term hazardous waste storage area.

Response: The 5-gallon pail of used oil was promptly taken to the appropriate satellite accumulation container for storage and subsequent removal from facility.

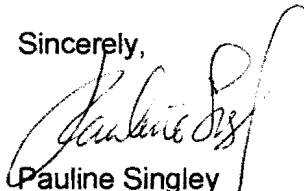
7-912(c)(1) Alleged Violation: Waste fluorescent lamps were observed accumulating in unlabeled containers in an area that was not properly identified for the storage of waste mercury-containing lamps.

Response: A sign labeled "Universal Waste" has been posted in the area where the mercury-containing lamps are stored. Containers are labeled "Universal Waste" and also have label on each container indicating what type of lamp is stored in the container.

Thank you, Mr. Flanders, for your response to the February inspection. John Miller has been a tremendous help to us and continues to provide us with excellent feedback and information.

Please let us know if you need further information on any of these responses. Thank you again for all your help.

Sincerely,

A handwritten signature in black ink, appearing to read "Pauline Singley". The signature is fluid and cursive, with a large initial "P" and "S".

Pauline Singley
Human Resources Manager
Standard Register Company

Cc: Tim D'Avignon, Maintenance Manager
George Wendel, Plant Manager

Encs (4)

VERMONT NOTIFICATION OF REGULATED WASTE ACTIVITY FORM For Hazardous Waste, Universal Waste, and Used Oil Handlers

1. First Notification (Provisional ID N^o, if applicable: VTP-_____-_____-_____)
 Subsequent Notification (EPA ID N^o: VT D-004-273-488) (please also complete entire form)
Reason(s) for change (e.g., name change, change of ownership with date, waste streams, regulatory status):
Update of contact name, company address
2. Company Name (as will appear on manifests): STANDARD REGISTER
3. Location Address (e.g., 22 Main St — not P.O. Box or rural route N^o): 1741 RTE 7 SOUTH
City/Town: MIDDLEBURY, VT County: ADDISON Zip Code: 05753
4. Mailing Address: same as 3, above; OR _____
City/Town: _____ State: _____ Zip Code: _____
5. Company Contact Person: (Last Name) WENDEL (First Name) GEORGE
Job Title: PLANT MANAGER Phone N^o: (802) 388-7911
Address: 1741 RTE 7 SOUTH State: MIDDLEBURY, VT Zip: 05753
6. Name of Legal Property Owner(s): THE STANDARD REGISTER COMPANY
Address: same as 3, above; OR same as 4, above; OR _____
State: _____ Zip Code: _____ Phone N^o: (_____) _____
7. Legal land status: Private (individual(s)/corp(s)) Federal State County Municipal Indian District
Legal facility-owner status: Private Federal State County Municipal Indian District
8. Does your company own other facilities or have affiliates in Vermont? Yes No
If yes, please list name(s) & location(s): _____
9. Hazardous Waste Activity (does not include either "used oil" or "universal waste" activities):
- a. Generator Status (consider the total amount of hazardous waste generated per month — not the amount shipped):
 Conditionally Exempt Generator (< 220 pounds/month of hazardous waste and < 2.2 lbs/mo of acutely hazardous waste generated)
 Small Quantity Generator (220 to 2,200 pounds/month of hazardous waste and < 2.2 lbs/mo of acutely hazardous waste generated)
 Large Quantity Generator (> 2,200 pounds/month of hazardous waste or ≥ 2.2 lbs/mo of acute hazardous waste generated)
(NOTE: 220 pounds = 100 kilograms; 220 pounds of waste with a density similar to water fills ≈ 1/2 of a 55-gallon drum)
- b. Transporter (see instructions before marking this section): of own waste only for commercial purposes
Mode of transportation: air rail highway water other: _____
- c. Other Activities (please see instructions before marking this section): hazardous waste transfer facility
 on-site recycling (e.g., solvent distillation; not antifreeze or silver recovery) certified treatment, storage or disposal
 off-site recycling hazardous waste fuel burner (Note: on-specification used oil is not hazardous waste fuel)
Please give details here: _____

Type or print clearly in dark ink. If additional sheets are needed, please mark each appended sheet with the information required by lines 2 and 3; each additional sheet should also be signed by an authorized representative and dated, per line 13. Refer to instructions; for further assistance in completing this form, contact the Hazardous Waste Program at 802-241-3888.

d. Description of Wastes Generated or Handled:

Regulated Waste Description	EPA/State Waste Code(s)*	Amount Generated On-site (in gallons or pounds/month)
Oil soaked pigs / sorbents	VT 02	17 lbs/mo
Waste standard solvent	VT 02	4.6 to 9.2 gal/mo
Unused paste inks + waste inks	VT 02	279 lbs/mo
Ultraviolet wash solvent	VT 02	165 gal/mo

* see instructions and attached sheets for frequently-used waste codes; for additional assistance, call 802-241-3888

10. Used Oil Activity (please mark all that apply):

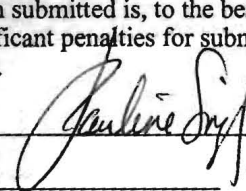
- a. Person first claims that used oil fuel meets specifications Used oil generator only.
- b. Person who directs used oil to a used oil burner — go to e, below (burner(s) name/address: _____)
- c. Person who burns used oil on-site — go to h, below (_____)
- d. Person who directs shipment of used oil to a re-refinery
- e. Used Oil Fuel Marketer: specification used oil off-specification used oil hazardous waste fuel
 Marketer who directs shipment of used oil to other marketers
- f. Used Oil Collection Facility
- g. Used Oil Transporter
- h. Used Oil Fuel Burner: specification used oil off-specification used oil hazardous waste fuel
- Type of equipment used: space heater (rated @ <0.5 million BTU/hr) utility boiler industrial boiler (rated @ >10 million BTU/hr at manufacturing facility) industrial furnace (integral component of manufacturing process)
 other (please specify) _____
- Is used oil fuel accepted from an off-site locations to be burned on-site? Yes No
- If yes, please list the company/ies and address(es) from which used oil is accepted: _____

11. Universal Waste Activity: (e.g., batteries, Hg-lamps, PCB ballasts, pesticides) large quantity handler destination facility

Type(s) of universal waste handled: Ship lamps for re-cycling.

12. Comments: Updated Source Description attached.

13. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of authorized representative:  Date: 6-5-02

Name: PAULINE SINGLEY Title: Human Resources Manager

For assistance in completing this form, contact the Hazardous Waste Program at 802-241-3888

Please return completed form to: Waste Management Division; 103 South Main St, West Building; Waterbury VT 05671-0404

Standard Register Company
Middlebury, Vermont
June 5, 2002

SOURCE DESCRIPTION:

Standard Register Company (SRC) was established in Middlebury in 1966; approximately 188 employees work three shifts/day, five and one half days/week. The facility manufactures custom business forms.

SRC use 24 offset printing presses to produce forms ranging in format from simple one color/one page forms to collated multicolor forms many pages in length. These forms may also be customized to meet specific needs of clients; options include numbering, hole punching, folding and gluing. The aluminum plates used in the printing process are for offset litho printing technology.

There are four hazardous waste streams generated at SRC; these include oil soaked pigs/sorbents (VT 02), waste stoddard solvent (VT02), unused paste inks and waste inks (VT02) and ultraviolet wash solvent (VT02).

Launderable oil soaked pigs and sorbent generated by the clean up of leaks from the machines in the facility are sent out to a laundry service (Coyne Textile). Disposable pigs are manifested out as hazardous waste through Heritage. SRC generates 203 lbs. of disposable pigs per year. The disposable pigs are sent by Heritage to Michigan Disposal and are processed in a landfill.

The waste stoddard solvent (mineral spirits) is generated by cleaning the ink rollers of the presses. This waste is generated slowly because the solvent evaporates quickly and is used infrequently at the facility. SRC generates approximately one to two drums per year.

Waste parts washing solvent is generated from the numbering machine parts cleaning process and roller wash. The Crystal Clean (CC) unit is serviced approximately every six weeks. An aqueous parts cleaner is used for cleaning the numbering machines.

Unused inks and waste inks are manifested out through Heritage as hazardous waste. The inks are shipped to Norlite Corp., Hukill Chemical or CRI and the process is Fuels Blend. SRC ships out approximately seven drums (some inks left in original cans) per year.

UV Wash is generated by press and roller wash and collected at UV Wash parts washer stations and then manifested out every six weeks as hazardous waste through Heritage. SRC generates 36 drums per year.

Other non-hazardous waste streams generated at SRC include waste gear oil, 4 foot and 8 foot fluorescent light bulbs, waste adhesives and waste coatings, and silver.



**HERITAGE ENVIRONMENTAL SERVICES, LLC
WASTESTREAM SURVEY FORM
(877)436-8778
Heritage Form HERWS01**

Heritage Use Only	
Quote #	Approval Fee
Ws#	P.O.
Sample #	Heritage Contact

Preferred Service Location:

Indianapolis, IN Charlotte, NC Kansas City, MO Lemont, IL Coolidge, AZ Williston, VT Louisville, KY
 Heritage Hazardous Landfill (Roachdale, IN) Heritage Non-Hazardous Landfill (Roachdale, IN) Toledo, OH

1. GENERATOR INFORMATION

Heritage Generator Number (if known) 45435-4
 Generator Name Standard Register
 Address 1741 Route 7 South
 City, State, Zip Middlebury, VT. 05753
 Tech. Contact _____
 Phone 802 388 7911 | Fax 802 388 3654
 E-mail _____
 US EPA ID VT D 0042 73488
 State ID Numbers _____
 Generator Status
 LQG SQG CESQG Non-hazardous

2. BILLING INFORMATION

Quote to: Generator Customer Other
 Customer Heritage Crystal Clean
 Address 3970 W. 10th Street Suite A
 City, State, Zip Indianapolis, In. 46222
 Contact Name Theresa Miller
 Phone 317 290 3658 | Fax 317 486 5087
 E-mail _____

3. MANIFEST MAIL ADDRESS Generator Billing
 Contact Name Tim O'Huighon
 Company Standard Register
 Address 1741 Route 7 South
 City, State, Zip Middlebury, VT. 05753

4. SIC Code wastestream was generated under (if code is 2911, 28—, or 3312 complete form HERWS03) _____
 5. Common Name UV wash
 Process Generating Waste Cleaning Roll Process
 7. DOT Description (if available) Waste Combustible liquid, N.O.S, NA1993, P&H

8. Chemical Composition: Using specific chemical names, list all constituents present in the wastestream. Attach available analyses or MSDSs. Remember to identify Form R/TRI Toxic Chemicals. Total composition must equal or exceed 100%.

Constituent	Range	Units
<u>Propylene Glycol methyl Ether</u>	<u>100%</u>	
<u>Diacetone Alcohol</u>		

9. Identify US EPA waste codes D001
 10. US EPA Form Code W203 US EPA Source Code G11
 11. Identify state waste codes NONE
 12. Color Varies Appearance Liquid Odor Strong
 13. %Solids 0-2% %Liquids 98%
 14. Physical State at 70 °F Solid Liquid Sludge Semi-solid Powder Gas
 If solid, are there free liquids? NA Yes No (If no, will waste dump from the drum? Yes No
 Is the wastestream pumpable? Yes No
 15. pH or pH range (if wastestream is solid, give pH of 10% slurry): 5-9
 Flash Point: <100°F 100-140°F 141-200°F >200°F
 Boiling Point: <100°F >100°F
 Fuel Value (Btu/lb): <2000 2000-6000 6000-10,000 > 10,000

16. Is the waste generated from, or associated with, metal finishing or other plating activities? Yes No

Common Name (same as Item #5):

17. If the waste is federally hazardous, is this waste subject to Subpart CC regulation at 40 CFR 265.1080-1091 (i.e. contains greater than 500 ppm VOCs)? Yes No NA
18. Does this material meet the definition of a used oil (40 CFR 279)? Yes No If yes, has the waste been mixed with hazardous waste? Yes No
19. Does the wastestream contain asbestos? Yes No If Yes, is the asbestos friable? Yes No
 Does the wastestream contain human sanitary, biological, or infectious waste? Yes No
 Does the wastestream contain dioxins or furans or dioxin-precursors? Yes No
 Does the wastestream contain radioactive wastes? Yes No
 Does the wastestream contain PCBs? Yes No If Yes, what concentration? _____ ppm
 Is the wastestream air reactive, autoignitable, pyrophoric or spontaneously combustible? Yes No
 Is the wastestream water reactive? Yes No
 Does the wastestream present other compatibility concerns? Yes No If yes, specify _____
 Is the wastestream dusty? Yes No
20. List all Attachments

21 a. Transporter: Heritage Transport Other
 24 Hour Emergency Number _____
 If transporter is not Heritage Transport, complete the following:
 Transporter Name Heritage Crystal Clean
 Address _____
 City, State, Zip _____
 Contact/Phone _____
 US EPA ID No. _____

21b. Packaging:
 Bulk Solid Bulk Liquid
 Container
 Container Type Drum
 Container Size 30 Gal
 Annual Volume (units) _____

22. **CERTIFICATION** Sign and date the certification.
 I hereby certify that all information submitted herein and attached contains true, accurate and complete descriptions of this waste. Any sample submitted for analysis is representative of the waste material being offered for approval. All relevant information regarding known or suspected hazards in the possession of the generator has been disclosed. I have reviewed the physical facilities, administrative practices, and operational procedures (or have directed the completion of such a review) and based on this review do willingly make this certification. I authorize Heritage to obtain a sample from any waste shipment for purposes of recertification. I will notify Heritage Environmental Services, LLC if the generator status or any other information on this form changes.

Signature [Signature] Date 16 May 07 Company Standard Register

23. If wastestream carries F001, F002, F003, F004, and/or F005, identify concentration in mg/l or mg/kg for each constituent, if constituent is present, but concentrations are unknown, check the line.

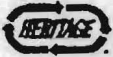
Acetone	_____	2-Ethoxyethanol	_____	2-Nitropropane	_____
Benzene	_____	Ethyl Acetate	_____	Pyridine	_____
n-Butyl Alcohol	_____	Ethyl Benzene	_____	Tetrachloroethylene	_____
Carbon Disulfide	_____	Ethyl Ether	_____	Toluene	_____
Carbon Tetrachloride	_____	Isobutanol	_____	1,1,1-Trichloroethane	_____
Chlorobenzene	_____	Methanol	_____	1,1,2-Trichloroethane	_____
Cresol (m and p)	_____	Methylene Chloride	_____	Trichloroethylene	_____
o-Cresol	_____	Methyl Ethyl Ketone	_____	1,1,2-Trichloro-1,2,2-trifluoroethane	_____
Cyclohexanone	_____	Methyl Isobutyl Ketone	_____	Trichlorofluoroethane	_____
1,2-Dichlorobenzene	_____	Nitrobenzene	_____	Xylenes (total)	_____

24. System Type M141 Total Alkalinity 0 TOC 710 Halogens 0 Sulfides 0 Zn 0
 Hex Chrome 0 Total Acidity 0 HOC 0 Cyanides 0 Ni 0

Toxicity Characteristic Constituents Provide the TCLP results for the following constituents in mg/l:

D004 Arsenic	<u>BRL</u>	D014 Methoxychlor	<u>BRL</u>	D024 m-Cresol	<u>BRL</u>	D034 Hexachloroethane	<u>BRL</u>
D005 Barium	_____	D015 Toxaphene	_____	D025 p-Cresol	_____	D035 Methyl Ethyl Ketone	_____
D006 Cadmium	_____	D016 2,4-D	_____	D026 Cresol	_____	D036 Nitrobenzene	_____
D007 Chromium	_____	D017 2,4,5-TP(Silvex)	_____	D027 1,4-Dichlorobenzene	_____	D037 Pentachlorophenol	_____
D008 Lead	_____	D018 Benzene	_____	D028 1,2-Dichloroethane	_____	D038 Pyridine	_____
D009 Mercury	_____	D019 Carbon Tetrachloride	_____	D029 1,1-Dichloroethylene	_____	D039 Tetrachloroethylene	_____
D010 Selenium	_____	D020 Chlordane	_____	D030 2,4-Dinitrotoluene	_____	D040 Trichloroethylene	_____
D011 Silver	_____	D021 Chlorobenzene	_____	D031 Heptachlor	_____	D041 2,4,5-Trichlorophenol	_____
D012 Endrin	_____	D022 Chloroform	_____	D032 Hexachlorobenzene	_____	D042 2,4,6-Trichlorophenol	_____
D013 Lindane	_____	D023 o-Cresol	_____	D033 Hexachlorobutadiene	_____	D043 Vinyl Chloride	_____

Complete for Williston, VT
Coolidge, AZ



HERITAGE ENVIRONMENTAL SERVICES, LLC
WASTESTREAM SURVEY FORM
(877)436-8778
Heritage Form HERWS01

Heritage Use Only	
Quote #	Approval Fee
Waste	P.O.
Sample #	Heritage Contact

Preferred Service Location:

Indianapolis, IN Charlotte, NC Kansas City, MO Lemont, IL Coolidge, AZ Williston, VT Caldwell, TX
 Heritage Hazardous Landfill (Roachdale, IN) Heritage Non-Hazardous Landfill (Roachdale, IN) Toledo, OH

1. GENERATOR INFORMATION

Heritage Generator Number (if known) _____

Generator Name Standard Register Co

Address 1741 Route 7 South

City, State, Zip Middlebury, VT 05753

Tech. Contact Tim D'Avignon

Phone 1-802-388-7911 Fax 1-802-388-3654

E-mail _____

US EPA ID _____

State ID Numbers _____

Generator Status

LQG SQG CESQG Non-hazardous

2. BILLING INFORMATION

Quote to: Generator Customer Other

Customer _____

Address _____

City, State, Zip _____

Contact Name _____

Phone _____ Fax _____

E-mail _____

3. MANIFEST MAIL ADDRESS Generator Billing

Contact Name _____

Company _____

Address _____

City, State, Zip _____

4. SIC Code wastestream was generated under (if code is 2911, 28—, or 3312 complete form HERWS03)

5. Common Name Oil for Re-Refining

6. Process Generating Waste Out of spec

7. DOT Description (if available) NON KCRH NON DOT REGULATED MATERIAL

8. Chemical Composition: Using specific chemical names, list all constituents present in the wastestream. Attach available analyses or MSDSs. Remember to identify Form R/TRI Toxic Chemicals. Total composition must equal or exceed 100%.

Constituent	Range	Units
<u>Oil for Re-Refining</u>	<u>100%</u>	

9. Identify US EPA waste codes NONE

10. US EPA Form Code W206 US EPA Source Code 611

11. Identify state waste codes NONE

12. Color Black Appearance liquid Odor Mild

13. %Solids 0 %Liquids 100%

14. Physical State at 70 °F Solid Liquid Sludge Semi-solid Powder Gas
If solid, are there free liquids? Yes No (If no, will waste dump from the drum? Yes No
Is the wastestream pumpable? Yes No

15. pH or pH range (If wastestream is solid, give pH of 10% slurry): 7
Flash Point: <100°F 100-140°F 141-200°F >200°F
Boiling Point: <100°F >100°F
Fuel Value (Btu/lb): <2000 2000-6000 6000-10,000 > 10,000

16. Is the waste generated from or associated with metal finishing or other plating activities? Yes No

Common Name (same as Item #5): OIL FOR RE-REFINING

17. If the waste is federally hazardous, is this waste subject to Subpart CC regulation at 40 CFR 265.1080-1091 (i.e. contains 3500 ppm VOCs)? Yes No NA CE 3/18/02

18. Does this material meet the definition of a used oil (40 CFR 279)? Yes No If yes, has the waste been mixed with hazardous waste? Yes No AD 4-17-02

19. Does the wastestream contain asbestos? Yes No If Yes, is the asbestos friable? Yes No
 Does the wastestream contain human sanitary, biological, or infectious waste? Yes No
 Does the wastestream contain dioxins or furans or dioxin-precursors? Yes No
 Does the wastestream contain radioactive wastes? Yes No
 Does the wastestream contain PCBs? Yes No If Yes, what concentration? _____ ppm
 Is the wastestream air reactive, autoignitable, pyrophoric or spontaneously combustible? Yes No
 Is the wastestream water reactive? Yes No
 Does the wastestream present other compatibility concerns? Yes No If yes, specify _____
 Is the wastestream dusty? Yes No

20. List all Attachments

21 a. Transporter: Heritage Transport Other
 24 Hour Emergency Number _____
 If transporter is not Heritage Transport, complete the following.
 Transporter Name _____
 Address _____
 City, State, Zip _____
 Contact/Phone _____
 US EPA ID No. _____

21b. Packaging:
 Bulk Solid Bulk Liquid
 Container
 Container Type drum
 Container Size 55 gallon
 Annual Volume (units) _____

22. CERTIFICATION Sign and date the certification.
 I hereby certify that all information submitted herein and attached contains true, accurate and complete descriptions of this waste. Any sample submitted for analysis is representative of the waste material being offered for approval. All relevant information regarding known or suspected hazards in the possession of the generator has been disclosed. I have reviewed the physical facilities, administrative practices, and operational procedures (or have directed the completion of such a review) and based on this review do willingly make this certification. I authorize Heritage to obtain a sample from any waste shipment for purposes of recertification. I will notify Heritage Environmental Services, LLC if the generator status or any other information on this form changes.

X Ann Dugno 3-18-02 Standard Register
 Signature Date Company

23. If wastestream carries F001, F002, F003, F004, and/or F005, identify concentration in mg/l or mg/kg for each constituent, if constituent is present, but concentrations are unknown, use the check box

Acetone	2-Ethoxyethanol	2-Nitropropane
Benzene	Ethyl Acetate	Pyridine
n-Butyl Alcohol	Ethyl Benzene	Tetrachloroethylene
Carbon Disulfide	Ethyl Ether	Toluene
Carbon Tetrachloride	Isobutanol	1,1,1-Trichloroethane
Chlorobenzene	Methanol	1,1,2-Trichloroethane
Cresol (m and p)	Methylene Chloride	Trichloroethylene
o-Cresol	Methyl Ethyl Ketone	1,1,2-Trichloro-1,2,2-trifluoroethane
Cyclohexanone	Methyl Isobutyl Ketone	Trichlorofluoroethane
1,2-Dichlorobenzene	Nitrobenzene	Xylenes (total)

24. Complete for Williston, VT; Caldwell, TX and

System Type	M141	Total Alkalinity	0	TOC	>10	Halogens	0	Sulfides	0	Zn	0
Hex Chrome	0	Total Acidity	0	HOC	0	Cyanides	0	Ni	0		
Toxicity Characteristic Constituents Provide the TCLP results for the following constituents in mg/l											
D004 Arsenic	BRL	D014 Methoxychlor	BRL	D024 m-Cresol	BRL	D034 Hexachloroethane	BRL				
D005 Barium		D015 Toxaphene		D025 p-Cresol		D035 Methyl Ethyl Ketone					
D006 Cadmium		D016 2,4-D		D026 Cresol		D036 Nitrobenzene					
D007 Chromium		D017 2,4,5-TP(Silver)		D027 1,4-Dichlorobenzene		D037 Pentachlorophenol					
D008 Lead		D018 Benzene		D028 1,2-Dichloroethane		D038 Pyridine					
D009 Mercury		D019 Carbon Tetrachloride		D029 1,1-Dichloroethylene		D039 Tetrachloroethylene					
D010 Selenium		D020 Chlordane		D030 2,4-Dinitrotoluene		D040 Trichloroethylene					
D011 Silver		D021 Chlorobenzene		D031 Heptachlor		D041 2,4,6-Trichlorophenol					
D012 Endrin		D022 Chloroform		D032 Hexachlorobenzene		D042 2,4,6-Trichlorophenol					
D013 Lindane		D023 o-Cresol		D033 Hexachlorobutadiene		D043 Vinyl Chloride					



WASTE DETERMINATION HERITAGE FORM # HERWS07

Facility Name: Standard Register Facility EPA ID #:
Facility Location: Middlebury VT Wastestream #:

1. Common Name: OIL FOR RE-REFINING
2. Process Generating the Waste: OUT OF SPEC
3. If MSDS(s) are to be used instead of analytical, list out all chemicals that are able to enter this wastestream. Attach MSDS(s).

4. Is the material a solid waste (Solid waste includes any material disposed of or abandoned in lieu of disposal, including materials burned, incinerated, or recycled and dioxins or furans, see 40 CFR 261.2. Please note that the word solid does not pertain to the physical state of the waste.)? Yes No
5. Is the material excluded from being a hazardous waste? (e.g., universal waste, used oil, etc.) Yes No If yes, note the exclusion and attach documentation.

- 6. Is the solid waste listed as a hazardous waste (The answer to this question is based upon the process generating the waste or the chemical constituents for virgin materials. An MSDS is attached if virgin material.) Yes No
7. The waste is not ignitable (D001) based on: attached MSDS(s), attached analytical, generator knowledge, Heritage special waste table
8. The waste is not corrosive (D002) based on: attached MSDS(s), attached analytical, generator knowledge, Heritage special waste table
9. The waste is not reactive (D003) based on: attached MSDS(s), attached analytical, generator knowledge, Heritage special waste table
10. The waste is not characteristic for metals (D004-D011) based on: attached MSDS(s), attached analytical, generator knowledge, Heritage special waste table
11. The waste is not characteristic for volatiles (D018-19, D021-22, D028-29, D035, D039-40, D043) based on: attached MSDS(s), attached analytical, generator knowledge, Heritage special waste table
12. The waste is not characteristic for semi-volatiles (D023-27, D030, D032-34, D036-38, D041-42) based on: attached MSDS(s), attached analytical, generator knowledge, Heritage special waste table
13. The waste is not herbicides and pesticides (D012-17, D020, D031) based on: attached MSDS(s), attached analytical, generator knowledge, Heritage special waste table
14. Does the waste require special handling (e.g., fugitive dust, heat producing)? Yes No If yes, identify
15. The waste does not contain friable asbestos material; Category I nonfriable asbestos-containing material that has become friable; Category I nonfriable asbestos-containing materials that will be or has been subjected to sanding, grinding, cutting, or abrading; and Category II nonfriable asbestos-containing material that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder by the forces expected to act on the material.
16. The waste does not contain PCB's and is not a Department of Transportation Hazardous Material.
17. The waste does not exhibit the presence of heat, or the capability of generating heat, or other significant risks that the particular waste may present in any reasonable anticipated handling, transportation, storage, processing, or reuse of that waste.

Certification

I hereby certify that all information submitted herein and attached contains true, accurate and complete descriptions of this waste and will notify Heritage Environmental Services, LLC (Heritage) if information on this form changes. The non-hazardous industrial waste represented above is not a hazardous waste. A waste determination was performed on this waste in accordance with 40 CFR 240-299 and 40 CFR 761. The characteristics of this waste have not changed since a waste determination was performed. I will notify Heritage if the characteristics of this waste change. For wastes generated in Indiana and/or landfilled in Indiana the waste determination was done in accordance with IC 13-20-7.5-2 Documentation that supports the waste determination will be made available, upon request, to the landfill and the Indiana Department of Environmental Management.

Generator's Signature: Tim Daignon Title: MAINT ENG MANAGER
Printed Name: Date:

00AMJ040.11E Tim DAIGNON 3-18-02 July 2000



State of Vermont

Department of Fish and Wildlife
Department of Forests, Parks and Recreation
Department of Environmental Conservation
State Geologist
RELAY SERVICE FOR THE HEARING IMPAIRED
1-800-253-0191 TDD>Voice
1-800-253-0195 Voice>TDD

AGENCY OF NATURAL RESOURCES
Department of Environmental Conservation

Management and Prevention Section
Waste Management Division
103 South Main Street/West Office Building
Waterbury, Vermont 05671-0404
(802) 241-3888
FAX: (802) 241-3296

www.anr.state.vt.us/dec/wmd.htm

Date: May 3, 2002

Mr. George Wendel, Plant Manager
The Standard Register Company
1741 Route 7 South
Middlebury, Vermont 05753

CERTIFIED MAIL

7000 0600 0027 4346 2087

SUBJECT: Notice of Alleged Violation
Generator ID N° S-01-11-030

EPA ID N° VTD 004 273 488

Dear Mr. Wendel:

On February 14, 2002, a representative of the Vermont Agency of Natural Resources, Waste Management Division (WMD), conducted a compliance evaluation inspection at The Standard Register Company (SRC), of Middlebury, Vermont. The purpose of this letter is to notify you that the Agency of Natural Resources believes that on the date of the inspection The Standard Register Company was in violation of the following Vermont Hazardous Waste Management Regulations (VHWMR) described below:

- VHWMR Section 7-104(a) & (c):

7-104 NOTIFICATION REQUIREMENTS

(a) Any person who generates or transports hazardous waste or who owns or operates a transfer facility or a facility for the treatment, storage, use, disposal, or recycling of hazardous waste shall notify the Secretary of such activity.

* * *

(c) Persons subject to the requirements of this Section shall maintain an up-to-date Notification of Regulated Waste Activity form filed with the Secretary which accurately describes current waste activity and waste generation.

Alleged Violation: Company information on file with the Vermont Agency of Natural Resources, Waste Management Division was not current.

- VHWMR Section 7-202(b):

7-202 HAZARDOUS WASTE DETERMINATION

* * *

(b) *A person who generates or who is in control of a waste must determine if that waste is a hazardous waste as described in subsection (a) above*

Alleged Violation: The Waste UV Wash, POSCO waste stream components had been incorrectly identified in documents provided to SRC's hazardous waste disposal firm.

- VHWMR Section 7-203(x)(2)(B) :

7-203 GENERAL EXEMPTIONS

The following wastes are exempted from the provisions of these regulations:

* * *

(x) *Reusable absorbent material contaminated with used oil that does not exhibit a hazardous waste characteristic provided that:*

* * *

(2) *The contaminated absorbent material is picked up, cleaned, and delivered back to the generator under a contractual agreement with a commercial laundering service and:*

* * *

(B) *Prior to being picked up by the launderer, the absorbent material is:*

(i) *Stored in closed bags or other containers in an area on-site that meets the design standards of Section 7-311(a)(1) through (4); and*

(ii) *Identified as used absorbent material destined for laundering.*

Alleged Violations: Oily (VT02) wipes and sorbents accumulating on the service area loading dock prior to shipment for commercial laundering were stored neither as hazardous wastes nor in a manner meeting the requirements for exemption from management as a hazardous waste. Neither the container collecting full laundry bags of sorbents nor the bags themselves was labeled. Also, an open, unlabeled five gallon pail of used sorbent pigs was observed on the loading dock.

- VHWMR Section 7-307(c)(2) :

7-307 SMALL QUANTITY GENERATOR

* * *

(c) *A small quantity generator must:*

* * *

- (2) *Ensure transport of hazardous waste off-site either within 180 days of the date when the waste first started to accumulate,...*

Alleged Violations: Two 55-gallon drums in the short term hazardous waste storage area labeled as containing a hazardous waste (VT02) Used Oil were observed to have accumulation start dates of 12/00 and 4/01, respectively.

- VHWMR Section 7-307(c)(5):

7-307 SMALL QUANTITY GENERATOR

* * *

- (c) *A small quantity generator must:*

* * *

- (5) *Comply with the general management standards of Section 7-309;*

AND

- VHWMR Section 7-309(a)(1)(B):

7-309 GENERAL MANAGEMENT STANDARDS FOR SMALL AND LARGE QUANTITY GENERATORS

- (a) *Preparedness and Prevention*

* *

- (1) *Required equipment*
All facilities must be equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment specified below:

* * *

- (B) *A device, such as a telephone, immediately available at the scene of operations, or a hand held two-way radio, capable of summoning emergency assistance from local police departments, fire departments or state or local emergency response teams;*

Alleged Violation: Access to emergency communications equipment was not immediately available at the short term hazardous waste storage area.

- VHWMR Section 7-707(a & b) :

7-707 EXCEPTION REPORTING

- (a) *Each generator who does not receive a completed copy of the manifest*

- (1) *from the designated facility within 35 days, or*

(2) *from the foreign consignee within 60 days,*

of the initial shipment must take all actions necessary to locate the shipment and manifest, including contacting the designated transporter and designated facility.

(b) *Each generator who does not receive a completed copy of the manifest from the designated facility within 45 days of the initial shipment must immediately submit an exception report to the Secretary. The report must include a legible copy of the manifest and a cover letter signed by the generator or his or her authorized representative explaining the efforts taken to locate the waste and results of those efforts.*

Alleged Violation: At the time of the inspection SRC did not have the Uniform Hazardous Waste Manifest "Copy 3: Facility Mails to Generator" manifest copies, confirming delivery of shipments to a designated facility, for seven manifested hazardous waste shipments made during the period 10/11/2000 and 9/26/2001 and had not filed the required exception reports with the Agency.

• VHWMR Section 7-311(d)(1) :

7-311 SHORT-TERM STORAGE AREA STANDARDS FOR SMALL AND LARGE QUANTITY GENERATORS

* * *

(d) *Inventory and Inspection*

(1) *Small and large quantity generators shall maintain, at a location apart from the short-term storage area, a list of all hazardous waste currently in storage. For generators storing hazardous waste in containers, the list shall identify each container being stored and the type of hazardous waste held by each container.*

Alleged Violation: No inventory of hazardous wastes in storage was available for review at the time of the inspection.

• VHWMR Section 7-311(e)(1) :

7-311 SHORT-TERM STORAGE AREA STANDARDS FOR SMALL AND LARGE QUANTITY GENERATORS

* * *

(e) *Security*

(1) *Small and large quantity generators must post a sign at each short-term hazardous waste storage area, which must be visible from at least 25 feet with the legend, "Danger-Hazardous Waste Storage Area-Authorized Personnel Only". The legend must be written in both English and French in facilities located in counties bordering the Canadian province of Quebec. Existing signs with a similar legend may be used if the legend on the sign indicates that only authorized personnel are allowed to enter the storage area, and that entry onto the storage area can be dangerous.*

Alleged Violation: The short-term hazardous waste storage area was not identified by "Danger-Hazardous Waste Storage Area-Authorized Personnel Only" signs posted on either the interior or the exterior doors leading to its location on the loading dock off the plant's general service area.

- VHWMR Section 7-311(f)(1) and (4)(A) :

7-311 SHORT-TERM STORAGE AREA STANDARDS FOR SMALL AND LARGE QUANTITY GENERATORS

* * *

(f) Use and Management of Containers

- (1) With the exception of satellite accumulation containers managed in accordance with Section 7-310(a), containers, and packages used for the storage of hazardous wastes shall be clearly marked at the time they are first used to accumulate or store waste. Such marking shall include: the generator's name, address, and EPA identification number; the name and hazardous waste identification number(s) of the hazardous waste stored therein; the date when the container was first used to accumulate or store hazardous waste and the following language, "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency."

* * *

(4) Management of containers

- (A) A container holding hazardous waste must always be closed during storage except when it is necessary to add or remove waste;

Alleged Violation: An open and unlabeled, half-filled 5-gallon pail of used oil (hazardous waste code VT02) was observed in the short-term hazardous waste storage area.

- VHWMR Sections 7-912(d)(5)(A)(ii) and (e)(6):

7-912 STANDARDS FOR SMALL AND LARGE QUANTITY HANDLERS OF UNIVERSAL WASTE

* * *

(d) Waste Management

* * *

(5) Universal Waste Mercury-Containing Lamps

* * *

- (A) Both small and large quantity handlers must manage universal waste mercury-containing lamps in a way that prevents releases of any universal waste or component of a universal waste to the environment. Small and large quantity handlers must:

* * *

- (ii) *Store packages of waste mercury-containing lamps in a designated storage area that is identified with a sign that is visible from at least 25 feet and that has a legend that includes the words: "Waste Mercury-Containing Lamps".*

AND

- (e) *Labeling and marking.*

Small and large quantity handlers must label and mark universal waste to identify its type as specified below:

* * *

- (6) *Containers in which universal waste mercury-containing lamps are contained, must be labeled or marked clearly with any one of the following phrases: "Universal Waste-Mercury-Containing Lamp(s)," or "Waste Mercury-Containing Lamp(s)," or "Used Mercury-Containing Lamp(s)".*

Alleged Violation: Waste fluorescent lamps were observed accumulating in unlabeled containers in an area that was not properly identified for the storage of waste mercury-containing lamps.

In response to the alleged violations described above and pursuant to 10 V.S.A. Section 8008, the Agency may issue an Administrative Enforcement Order which, among other things, would: assess penalties, require correction and/or remediation of the alleged violations and require other measures as deemed appropriate. Your prompt response to this NOAV or correction of the alleged violations, through the actions requested below or by other acceptable means, may lessen the possibility or severity of any enforcement action which may be taken by the Agency.

Requested Action: Please provide written certification within thirty-five (35) days from the signing of this letter verifying that the necessary modifications have been made to your hazardous waste management program to resolve alleged violations described above. A follow-up inspection may be conducted shortly after this date. In your response, please describe the specific modifications that have been made to your hazardous waste management program to correct each alleged violation cited above.

If you have any questions regarding this Notice of Alleged Violation, please contact John Miller of the Management and Prevention Section at 241-3487.

Sincerely,



P. Howard Flanders
Director, Waste Management Division

cc: RCRAInfo

RCRA INSPECTION REPORT

I. GENERAL INFORMATION:

File: S-01-11-030
Company: Standard Register Company (SRC)
1741 Route 7 South
Address: Middlebury, Vermont 05753
Telephone: (802) 388-7911 {Facsimile: 802 386-3654}

Company Officials Interviewed: George Wendel, (GW) Plant Manager, SRC
Pauline Singley, (PS) Human Resources Mgr, SRC
Tim D'Avignon, (TD) Maintenance Supervisor, SRC

State Official Conducting Inspection: John Miller, Waste Management Division (WMD)

Type of Inspection: Compliance Evaluation Inspection

Date of Inspection: February 14, 2002

Last Inspection Date: December 14, 1995

II. RCRA REPORTING/INFORMATION REQUIREMENTS:

Facility EPA ID N^o: VTD 004 273 488
Type of Operation: Business form manufacture
Notification Date: August 7, 1980
Source Classification: Small Quantity Generator (100-1,000 Kg/month)

III. INSPECTION SCHEDULE:

I arrived and signed in at the front desk at 10:15 a.m. Pauline Singley met me there and escorted me to George Wendel's office, where we were joined by Tim D'Avignon. I explained that I was on-site to conduct an inspection to evaluate compliance with Vermont's Hazardous Waste Management Regulations (VHWMR). The inspection included an introductory conference with GW, PS and TD, a review of facility records associated with the hazardous waste program, a walk-through of the manufacturing and storage areas, and a brief concluding conference with GW and PS. I gave PS a copy of the closing conference log at the end of the session (Attachment 1). I left the facility at about 3:45 p.m.

IV. SOURCE DESCRIPTION:

Standard Register Company (SRC) was established in Middlebury in 1966; approximately 188 employees work three shifts/day, five and one half days/week. The facility manufactures custom business forms.

SRC uses 24 offset printing presses to produce forms ranging in format from simple one color/one page forms to collated multicolor forms many pages in length. These forms may also be customized to meet specific needs of clients; options include numbering, hole punching, folding and gluing. The aluminum plates used in the printing process are for offset litho printing technology.

Three hazardous waste streams are generated at SRC, these are: oil soaked pigs/sorbents (VT02), waste Stoddard solvent (VT02) and ultraviolet (UV) wash solvent (D001). Oil soaked pigs and sorbent (VT02) are generated by the clean up of leaks from the machines in the facility and are either sent out to a laundry service or disposed as a hazardous waste. The waste Stoddard solvent (VT02, mineral spirits, f.p. >140°F) is generated by cleaning the ink rollers of the presses. This waste is generated slowly because the solvent evaporates quickly and is used infrequently at the facility. SRC generates approximately one to two drums per year of waste Stoddard solvent. UV Wash (D001) is generated by press and roller wash and collected at UV Wash parts washer stations and then manifested out every six weeks as hazardous waste through Heritage. SRC generates 480 gallons per year of UV wash solvent.

Waste parts washing solvent is generated from the numbering machine parts cleaning process using a hazardous waste exempt Crystal Clean (CC) unit which is serviced approximately every six weeks. An aqueous parts cleaner is also used for cleaning the numbering machines.

Other waste streams generated at SRC include oil soaked pigs/sorbents, waste gear oil, unused inks, 4 foot and 8 foot fluorescent light bulbs, waste adhesives and waste coatings, rags, and silver.

- The oil soaked pigs and sorbent are generated by the clean up of leaks from the machines in the facility. Some are sent out to a laundry service and others disposed as hazardous waste.
- Waste gear oil is generated from leaks from the machines in the facility and is manifested out as non-hazardous waste through Heritage Environmental Services (Heritage) on a hazardous waste manifest (VT99). SRC generates about 110 gallons of used oil per year.
- Unused inks not contaminated with any other substance are shipped out through Heritage as regulated non-hazardous waste on a Bill of Lading. The inks are recycled by a facility that produces black ink. SRC ships out approximately two lab pack drums of these unused inks (left in the original cans) per year.
- Light bulbs are shipped out as universal waste to Heritage on a Bill of Lading.
- Waste adhesives and waste coatings are shipped out as a regulated non-hazardous waste to Heritage on a Bill of Lading.
- Rags are picked up by Coyne Textile and laundered;
- Silver is captured in a silver recovery unit attached to SRC's film processor/developer. The silver unit is exchanged periodically for a new unit with the Marcor Environmental Services of Franklin, Illinois.

V. GENERAL OBSERVATIONS:

During the introductory conference we determined that SRC needed to file an updated Notification of Regulated Waste Activity form because of changes in personnel and mailing address. After that, we began the facility inspection in TD's office at about 10:40 a.m. with the document review portion

of the inspection using the facility inspection checklist (Attachment 2). I also filled out a multi-media inspection checklist (Attachment 3). Refer to section VI of this report for specific details regarding the facility's document management. At about 2:00 p.m. we began the facility walk-through. Refer to section VII of this report for specific details regarding waste containers observed in storage during the facility walk-through. TD and PS advised me that SRC does not use satellite accumulation, but puts hazardous waste directly into the short term storage area. However, they noted that SRC's former hazardous waste storage area had been taken over recently to accommodate new printing equipment and that hazardous wastes were currently being stored on a closed loading dock off the plant's general service area. PS and TD stated that they were in the process of getting approvals to construct a new hazardous waste storage area. On route to the temporary hazardous waste storage area, we passed a group of boxes containing used fluorescent lamps leaning against the wall at the foot of the stairway leading to TD's Office. Although the boxes were taped shut, they were neither labeled nor dated to indicate they were universal waste lamps and had been in storage less than a year. Also this area was not identified by the required signs as a universal waste lamp storage area. (see photo, Attachment 4)

We arrived at the temporary designated short-term storage area at 2:15 p.m.. "No Smoking" signs were posted on the interior exit door leading to the loading dock and on the cabinet used to store used laundry rags. However, no "Hazardous Waste Storage Area....." signs were posted on either the interior or the exterior doors leading to the loading dock. Although a fire extinguisher and spill clean-up equipment were available on the loading dock, access to a telephone and alarm system were available only inside the maintenance shop. Drums of hazardous waste were stored along with drums of raw product at one side of the loading dock. Also, aisle space was inadequate. (see photos, Attachment 4) After the walk-through, PS and I returned to GW's office for the closing conference.

VI. DOCUMENT REVIEW:

- A. Training Records: Employee training was last conducted by Pauline Singley in September and October 2001. The next training sessions are scheduled October 2002. Training records and documents are kept on file as required.
- B. Contingency Plan: Documentation of arrangements with local emergency services providers meeting the requirements of § 7-309(a)(4) were available for review. (Attachment 5)
- C. Manifests: Prior to the inspection, a list of manifests generated by the facility since 1/1/99 was prepared. This list was then used at the time of the inspection as a reference for evaluating the manifests on file (Attachment 6). SRC did not have "Facility Manifests to Generator" copies for the following manifests and had not filed the required exception report with the Agency:
- N^o VT0100581, dated 10/11/2000
 - N^o VT0100943, dated 1/19/2001
 - N^o VT127059, dated 2/28/2001

Nº VT0136832, dated 4/11/2001

Nº VT0136998, dated 5/22/2001

Nº VT0137173, dated 7/6/2001

Nº VT0135519, dated 9/26/2001

All other manifests reviewed were complete. However, in the course of reviewing the SRC manifests and waste streams it was determined that the UV wash, POSCO waste stream #45435-4, identified by an MSDS as containing Propylene glycol methyl ether and Diacetone alcohol, was actually being shipped a waste flammable liquid reported to contain 2 Butoxy ethanol, with aliphatic and aromatic petroleum distillates. (Attachment 7)

- D. Inspection Logs: Daily inspection logs were being maintained by TD. The current checklist is kept on a clipboard hung on the shelving frame next to the wastes in storage (see photo, Attachment 4). Prior copies of the inspection log are kept in TD's office. The requirements of § 7-311(d)(2) are addressed in the checklist.
- E. Inventory Logs: A copy of the inventory log is normally kept in TD's office, but was unavailable for review at the time of the inspection and could not be located.
- F. Land Disposal Restriction (LDR) Notifications: Copies of the LDR notifications, when required, were available for each manifest reviewed and met the § 7-106 requirements.

VII. WASTES IN STORAGE:

The following containers were observed inside the hazardous waste short-term storage area during the inspection:

<u>No. of Containers</u>	<u>Type of Waste</u>	<u>EPA Code</u>	<u>Date of Accumulation</u>	<u>Marked & Labeled</u>	<u>Remarks</u>
1- 55 gal	oily socks	VT02	missing	yes	no start or fill date
1- 55 gal	Quick -Dri	D001	missing	yes	no start or fill date
2- 55 gal	used oil	VT02	12/00 & 4/01	yes	VT02 on HW labels
1- 5 gal	used oil	VT02	none	no	uncovered (see photo)
1- 5 gal	oily socks	VT02	none	no	uncovered (see photo)

VIII. CLOSING CONFERENCE:

I told GW and PS that I observed the following:

- an updated Notification of Regulated Waste Activity needed to be filed [§7-104(a) & (c)]

- the hazardous waste profile, hazardous waste manifests, and MSDS for the UV wash waste stream did not match, the waste was improperly identified [§7-202(b)]
- the rags awaiting commercial laundering were not properly labeled and therefore not exempt from management as a hazardous waste [§7-203(x)(2)(B)]
- hazardous wastes had been in the short term storage area for more than 180 days: two drums of VT02 used oil had start dates of 12/00 and 4/01; the oily socks drum and the Quick-Dri drum had no start dates. Manifests show no sorbents have been shipped since 1/25/2001. [§7-307(c)(2) Cited as §7-307(a)(1) in the closing conference log]
- a communications device and fire alarm were not immediately available to the short term hazardous waste storage area [§7-307(c)(5) & §7-309(a)(1)(B) Cited as §7-307(c)(9)(B) in the closing conference log]
- no exception reports had been filed for seven (7) hazardous waste manifests for which SRC had no confirmation of delivery to Heritage Environmental Services [§7-707(a) & (b)]
- the inventory of hazardous wastes in short term storage was not available for review at the time of the inspection [§7-311(d)(1)]
- the hazardous waste storage area did not have the required signs [§7-311(e)(1)]
- an open and unlabeled 5-gallon pail of used oil (VT02) was observed in the short term hazardous waste storage area [§7-311(f)(1) & (4)(A) Cited only §7-311(f)(4)(A) in the closing conference log]
- Universal Waste mercury-containing lamps were being improperly stored without labeling of the containers or posting of warning signs [§7-912(d)(5)(A)(ii) and §7-912(e)(6)]

I said that I need to check with my supervisor, but that I would expect this inspection to result in a Notice of Alleged Violation (NOAV). I also told them that penalties or fines are not typically associated with this level of enforcement. I thanked GW and PS for their time and assistance and said that the facility could expect to hear from the WMD in writing in about 6-8 weeks. I also said that the facility typically has one month to respond to the NOAV, and that the WMD may do a follow-up inspection after that time.

IX. ATTACHMENTS TO INSPECTION REPORT:

1. Vermont Hazardous Materials Management Division. Closing Conference Log, The Standard Register Company (S-01-11-030) February 14, 2002.
2. Vermont Waste Management Division. Hazardous Waste Inspection Checklist - Generators. Facility Name: The Standard Register Company. Inspector: John Miller February 14, 2002.
3. Waste Management Division Multi-Media Inspection Cover Page and DEC Multimedia Checklist. Facility Name: The Standard Register Company. Inspector: John Miller February 14, 2002.

4. John Miller (VT DEC, WMD). 2002. Seven (7) photographs taken at The Standard Register Company. February 14, 2002.
5. The Standard Register Company. 2001. Company Visitor Register 1/5/01-1/16/01 documenting on-site emergency coordination training by Middlebury Fire Department on 1/10/01. Two (2) pages.
6. Vermont Waste Management Division. 2002. Manifested Generator Shipments "Manifest Info for Waste Shipped 01/01/1999- 12/31/2001 ." Site Name: The Standard Register Company. February 14, 2002. Two (2) pages.
7. The Standard Register Company. 2001. Summary of waste stream verification with Heritage Environmental Services. Includes the Wastestream Survey Form for waste stream #45435-4 "Waste UV Wash", a hazardous waste manifest for a typical shipment, and an MSDS for the product currently in use. Thirteen (13) pages.

Vermont Department of Environmental Conservation
Hazardous Materials Management Division -- Management and Prevention Section
(802) 241-3888

CLOSING CONFERENCE LOG - ~~FIELD~~ INSPECTION

Site Name and Location: STANDARD REGISTER INC. MIDDLEBURY
File #: S-01-11-030 EPA ID #: VTD 004 273 488
Inspection Date: 2/17/02 Time of Interview: 3:50 pm Jek

INTERVIEW PARTICIPANTS:

<u>JOHN MILLER</u>	/Hazardous Materials Management Division
<u>PAULINE SINGLEY</u>	/ <u>STANDARD REGISTER</u>
<u>TIM DAUIGNOY</u>	/ <u>STANDARD REGISTER</u>
<u>GEORGE WENDERS</u>	/ <u>STANDARD REGISTER</u>

INTERVIEW OUTLINE:

- ___ If "new" person in interview, explain purpose of inspection (outreach/compliance assistance/partial compliance evaluation inspection) and inspection process.
- generator status appears to be:

- conditionally exempt (exempt from most of the hazardous waste regulations)
- fully-regulated generator SMALL QUANTITY GENERATOR

___ If conditionally exempt generator, can use local Solid Waste Management District to handle hazardous wastes (call and arrange in advance). On-site hazardous waste management suggestions (not required, but recommended) include:

- keep hazardous waste accumulation containers covered when not being added to (NOTE: all storage containers must be kept closed at all times)
- store hazardous wastes under cover and on impermeable surface
- identify hazardous waste containers as to their contents

___ Identify problems observed, if any (NOTE: ~~this was only a partial inspection;~~ hazardous waste handlers must meet all applicable hazardous waste requirements):

7-202(b)
WASTE ID
NOT MATCHING
MSDS + MANIFEST ✓

- 7-104(e) - MUST MAINTAIN UP TO DATE NOTIFICATION OF REGULATED WASTE ACTIVITY
- 7-203(x) - RAGS FOR LAUNDERING NOT PROPERLY LABELED
- 7-707(e+b) - MISSING EXCEPTION REPORTS FOR SHIPMENTS TO HERITAGE (TP manifests)
- 7-311(e)(1) - HAZARDOUS WASTE STORAGE AREA SIGN NOT FEETED
- 7-307(a)(1) - HAZARDOUS WASTE IN STORAGE 7180 DAYS NO START DATE ON QUIC DRI AND OILY SOCKS DRUMS
- 7-307(c)(3)(B) - PHONE & FIRE ALARM TOO FAR AWAY FROM SHORT TERM STORAGE AREA
- 7-311(A)(4)(A) - OPEN 5 GAL PAIL HALF FULLER USED OIL - NOT LABELED AS LOG OIL

7-311(x) -
MISSING HW
INVENTORY

- Identify necessary action on both sides (e.g.: missing information to be retrieved).
SR WILL SEND REVISED SOURCE DESCRIPTION - GET MISSING MANIFESTS - FILE EXCEPTION RPT
- ANR - CALCULATE FLOSH PT ON PILED - CONFIRM NATURE OF TECHNICAL WHITE OIL
- Explain usual process (i.e.: evaluate all information, check with supervisor, put through enforcement policy). If fairly confident, & not an order, can explain:
 - ___ thank you letter IDing that this visit occurred and outlining recommendations
 - informal enforcement letter/notice (typically with no fines or penalties); NGAV
 - 6-8 weeks for written notice from the Division (HMMD);
 - if informal enforcement, facility has ~ one month to respond/come into compliance and the HMMD may conduct a follow-up inspection.

912(d)(5)
912(e)(6)
WASTE LABEL
FORAGER + LABELS

- Any questions? Anything need clarification?
- Thank for time and assistance.

STANDARD RESEARCH INC.

2001 213 488

2-11-00

2/14/02

From Illinois.
Finals, enclosed
in this report
General findings

STANDARD RESEARCH
STANDARD RESEARCH
STANDARD RESEARCH

Small quantity available

- 1-101(6) - Most information up to date. Information is fairly up to date.
- 1-200(X) - Rare and information not too good.
- 1-201(11) - Machine repair records for 2000 to 2001 (partial)
- 1-201(12) - Machine repair records for 2001 to 2002 (partial)
- 1-201(13) - Machine repair records for 2002 to 2003 (partial)
- 1-201(14) - Machine repair records for 2003 to 2004 (partial)
- 1-201(15) - Machine repair records for 2004 to 2005 (partial)
- 1-201(16) - Machine repair records for 2005 to 2006 (partial)
- 1-201(17) - Machine repair records for 2006 to 2007 (partial)
- 1-201(18) - Machine repair records for 2007 to 2008 (partial)
- 1-201(19) - Machine repair records for 2008 to 2009 (partial)
- 1-201(20) - Machine repair records for 2009 to 2010 (partial)

20 will have been made for you - see below for details
and please let me know if you have any questions

111
111

1-201(21)
1-201(22)
1-201(23)
1-201(24)
1-201(25)
1-201(26)
1-201(27)
1-201(28)
1-201(29)
1-201(30)

VERMONT AGENCY OF NATURAL RESOURCES
DEPARTMENT OF ENVIRONMENTAL CONSERVATION, WASTE MANAGEMENT DIVISION
103 South Main Street/West Office, Waterbury, VT 05671-0404 (802) 241-3888

HAZARDOUS WASTE INSPECTION CHECKLIST - GENERATORS

Inspector(s): JOHN MILLER Date: FEB 14, 2002

Inspection Type: initial complaint other

GENERATOR INFORMATION VT "Genclass" ID N^o: S-01-11-030 // none

Facility Name: _____ Location: _____

Mailing Address: see multi-media (mm) checklist // OR: _____

Directions: see mm checklist // OR: _____

Contact(s)/Title(s): see mm checklist // OR: PAULINE SINGLEY - HR MANAGER

Phone N^o: see mm checklist // OR: _____ SIC Code(s): _____

EPA ID N^o: VT D-004-273-488 // Not on RCRIS

Generator Status: Registered: CEG SQG LQG not on RCRIS

Observed: CEG SQG LQG Non-generator

Number of Employees _____ Operating # of Days/Week _____ # of Shifts/Day _____

Does this company have other facilities or affiliates in Vermont? _____ Yes _____ No

Will send new source permit

If yes to above, please list names and locations: _____

SITE LOCATION INFORMATION (If not already in the file, please attach map with site identified)

Closest Intersection or Landmark to Site: CENTER OF MIDDLEBURY VILLAGE - ON RT 17

Miles from intersection/landmark identified above: 3.0 Miles, to: S (approx. compass direction)

Geographic Coordinates (if GPS data collected): Latitude _____° _____' _____" N / Longitude _____° _____' _____" W

SITE HISTORY

Date Current Use Established at this Location: 1966

Previous site uses/Names of operation since 1980: N/A or: _____

List any known environmental permits, violations or investigations associated with this site: _____

Has this site ever been visited by the WMD? Yes _____ No

If yes to above, indicate date: 12/14/95 and inspector: GARY URICH

Hazardous waste transporters: _____

Consultants: _____

Time Arrived 10:15 Walk-Through 2:00 Short-term Storage 2:15

Record Review 10:40 Closing Conference 3:15 Time Departed 3:45

CURRENT PROCESS INFORMATION

Product(s): _____

Primary Processes (e.g.: cutting, grinding): _____

Process Description: _____

Notes: _____

Description of Waste Streams Generated On-Site		
Description	Generation Rate (gal or lb/mo)	Disposal/Management Method & Comments
Dry cleaning solvents/sludges and lint <input type="checkbox"/> perc <input type="checkbox"/> stoddard <input type="checkbox"/> CFCs <input type="checkbox"/> _____		
Dry clean filters (<input type="checkbox"/> cartridge <input type="checkbox"/> spin disk)		
Dry cleaning waste water		
Waste oils {NOTE: exempt if managed per Subchapter 8}		
Used absorbents ("speedi-dry," booms, etc);		
Reuseable absorbents (e.g., rags) {exempt if managed per § 7-203(x)}		
Parts washing wastes/sludges		
Antifreeze {exempt if recycled, per § 7-203(m)}		
Tank bottom wastes		
Paints/lacquers/thinners		
Photographic/X-ray developing wastes {silver-bearing waste is exempt if recycled per § 7-204(g)}		Silver recovered <input type="checkbox"/> on-site <input type="checkbox"/> off-site Other:
PCBs (>50 parts per million)		
Electroplating wastes		
Pesticides; Herbicides		
Strong acids/bases (HW if pH ≤ 2 or ≥ 12.5; or, if solid or gaseous, a mixture with distilled water has those pHs)		
Spent solvents/degreasers; still bottoms		
Water-miscible fluids {exempt if recycled per 7-203(l)}		
Oil filters {exempt if managed per § 7-203(o)}		
Printing wastes (e.g., waste inks, blanket wash)		
Ignitable wastes (flashpoint <140° F)		
Other:		
Other:		

Total Hazardous Waste Generation Rate (approx): _____ pounds/month

RECORD REVIEW

General

- §7-303 Did the generator make a hazardous waste determination for all waste generated? *✓ HERITAGE PROFILE Updates* *Profiles with 11 profiles*
Y N NA
- §7-710(a)(2) Are test results maintained for 3 years after final disposal offsite for any hazard determination? Y N NA
- §7-304(a) Did the generator file a notification form? *✓ VERMONT PRINT OUT* Y N NA
- §7-304(b) Is the RCRIS notification current with regard to waste activity and waste generation? *CAUSE NOTIFICATION FOR* Y N NA
- §7-105(a)(2) Has the generator reported all discharges/releases [in excess of the thresholds listed in §7-105(a)(2)] of a hazardous waste or a hazardous material immediately by phone and written within 10 days? *ACSUED local check* Y N NA

Comments:
check with sites March 25, 1997
Tim Cropley
fixed and signed

Manifests

- §7-702(a)(1) Did the generator use the appropriate Uniform Hazardous Waste Manifest? Y N NA
- §7-702(b)(2) Is the receiving facility designated on each manifest? Y N NA
- §7-702(b)(3) Is the transporter's name, signature and date of acceptance on the manifest? Y N NA
- §7-309(b)(2) Is hazardous waste offered for shipment to transporters and TSDFs with EPA ID numbers? Y N NA
- §7-309(b)(6) Did the generator complete the generator's portion of the manifest before offering the waste for shipment? Y N NA
- §7-702(b)(4) Did the generator sign and date the manifest? Y N NA
- §7-309(b)(5)(B) If the waste is not considered hazardous in the disposal state, does the generator have that state's authorization to receive the waste? Y N NA
- §7-702(b)(5) Are all signed copies of the manifests retained for at least 3 years? Y N NA
- §7-702(b)(11) Have completed copies arrived within 35 days from the facility or 60 days from the consignee? If NO, see Exception Reports, page 6. Y N NA

Manifests

702(b)(6) Did the generator immediately send a copy to the Secretary? Y N NA

Comments: _____

Exports

§7-705(b)(1) Did the generator notify the EPA 60 days before the export of a hazardous waste? Y N NA

§7-705(b)(1)(A) Did the notification include the generator's name, mailing address, telephone number and EPA ID number? Y N NA

§7-705(b)(1)(B) **Did the notification include, by consignee, for each hazardous waste type:**

(i) A description of the hazardous waste, EPA code, DOT shipping name, hazard class, and DOT Code? Y N NA

(ii) The frequency or rate and period of time for waste to be exported? Y N NA

(iii) The estimated total quantity of waste? Y N NA

(iv) All points of entry and departure the waste will pass? Y N NA

(v) A description of the means by which each shipment of waste will be transported(e.g., mode of transportation, type of containers)? Y N NA

(vi) A description of the manner in which the hazardous waste will be treated, stored or disposed of in the receiving country? Y N NA

(vii) The name and site address of the consignee and any alternate consignee? Y N NA

(viii) The name of any transit countries through which the waste will be sent, the length of time, and the nature of waste handling during such transit? Y N NA

§7-705(b)(2) Was a notification sent to the EPA Office of Enforcement and Compliance Assurance; Office of Compliance, Enforcement Planning, Targetting and Data Division? Y N NA

§7-705(a)(2) Has the receiving country consented to accept the waste? Y N NA

Exports

- §7-705(a)(3) Did a copy of the EPA Acknowledgment of Consent accompany the shipments? Y__ N__ NA__
- §7-710(d)(1) Are copies of each notification of intent to export kept for 3 years? Y__ N__ NA__
- §7-710(d)(2) Are copies of the EPA Acknowledgment of Consent kept for 3 years? Y__ N__ NA__
- §7-710(d)(3) Are completed manifests from consignee kept for 3 years? Y__ N__ NA__

Comments: _____

Exception Reports

Has an exception report been filed for:

- §7-707(a)(1) No completed copy of the manifest from a TSD within 35 days? Y__ N__ NA__
- §7-707(a)(2) No manifest copy from a foreign consignee within 60 days? Y__ N__ NA__
- §7-707(c)(3) For waste returned to the United States? Y__ N__ NA__
- §7-710(a)(1) Are exception reports kept on file for 3 years? Y__ N__ NA__

Comments: _____

Annual Reports

- §7-708(a) Did the generator (if LQG or TSDF) file the most recent biennial report? Y__ N__ NA__
- §7-710(a)(1) Are annual/biennial reports kept for 3 years? Y__ N__ NA__

Comments: _____

Contingency Planning/Employee Training — Small Quantity Generators

(See page 9 for Large Quantity Generators)

§7-307(c)(9)(A) At all times, is an emergency coordinator either on the premises or on call who can complete the § 7-308(b)(9)(F)(i, iii) incident reporting requirement? Y N NA

§7-308(b)(9)(E) **Whenever there is an imminent or actual emergency situation, does the emergency coordinator (or designee) know to do the following immediately:**

(i) Activate internal facility alarms or communication systems? Y N NA

(ii) Notify appropriate state or local agencies with designated response roles if their help is needed? Y N NA

(iii) If a release has occurred, identify the source, character, amount and extent of any released materials by record review or chemical analysis? Y N NA

(iv) Assess hazards to human health and the environment, considering all direct and indirect effects? Y N NA

(v) **If the emergency coordinator determines that the facility has had a fire, explosion or release which could threaten human health or the environment outside the facility, does the coordinator know to:**

(aa) Determine if local evacuation may be necessary, and, if so, notify appropriate local authorities and be available to assist local authorities in evacuation measures? Y N NA

(bb) Notify the National Response Center (800-424-8802) and indicate his or her name and telephone number; name and address of the facility; time and type of incident; quantity of material(s) involved to the extent known; the extent of any injuries; and the possible hazards to human health or the environment outside the facility? Y N NA

(vi) Take all reasonable measures necessary to ensure that fires, explosions and releases do not occur, recur, or spread to other hazardous waste at the facility? These measures must include, where applicable, stopping processes and operations, collecting, and containing released waste, and removing or isolating containers. Y N NA

Contingency Planning/Employee Training — Small Quantity Generators

(See page 9 for Large Quantity Generators)

(vii) If the facility stops operations in response to a fire, explosion or release, the emergency coordinator must monitor for leaks, pressure buildup, gas generation or ruptures in valves, pipes or other equipment, wherever this is appropriate? Y N NA

(viii) Immediately after an emergency, the emergency coordinator must provide for treating, storing or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire or explosion at the facility? Y N NA

(ix) Ensure that in the affected areas of the facility, no waste that may be incompatible with the released material is stored until cleanup procedures are completed and all emergency equipment is cleaned and restored to a useable condition? Y N NA

§7-307(c)(9)(C) Has annual training been provided to all employees RE: evacuation signals, routes, proper waste handling, and emergency procedures? Y N NA

§7-307(c)(9)(C) Do training records document the date of training for each employee? Y N NA

§7-307(c)(9)(C) What is the date of the most recent training? Oct → Dec 01

Training conducted by Pauline Sinsley

Date of next planned training Oct '02

Comments in House Hazwoper operation Sept 01 & Oct 01
Previous May '00

Contingency Planning — Large Quantity Generators

§7-308(b)(9) Does the generator have a written contingency plan for the facility? Y N NA

§7-308(b)(9)(A) **Does the Contingency Plan contain:**

(i) A description of the actions facility personnel must take to comply with Sections 7-308(b)(9)(A) and 7-308(b)(9)(E) (emergency procedures) in response to fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, groundwater or surface water at the facility? Y N NA

(iii) Arrangements agreed to by local police departments, fire departments, hospitals, contractors and state and local emergency response teams to coordinate emergency services pursuant to 7-309(a)(4)? Y N NA

(iv) An up-to-date list of names, addresses and office and home phone numbers of all persons qualified to act as emergency coordinator? Y N NA

(v) An up-to-date list of all emergency equipment at the facility, including location, physical description of each item listed and a brief outline of its capabilities? Y N NA

(vi) An evacuation plan including signals to be used to begin evacuation, evacuation routes and alternate evacuation routes? Y N NA

§7-308(b)(9)(B) Are copies of the contingency plan and all revisions maintained at the facility and submitted to all local police and fire departments, hospitals, and state and local emergency response teams that may be called upon to provide emergency services? Y N NA

§7-308(b)(9)(C) **Has the contingency plan been reviewed and revised whenever:**

(i) Applicable regulations are revised? Y N NA

(ii) The plan fails in an emergency? Y N NA

(iii) The facility changes in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency. Y N NA

(iv) The list of emergency coordinators changes? Y N NA

(v) The list of emergency equipment changes? Y N NA

§7-308(b)(9)(D) At all times is there at least one emergency coordinator either at the facility or on call? Y N NA

Contingency Planning — Large Quantity Generators

§7-308(b)(9)(E)

Whenever there is an imminent or actual emergency situation, does the emergency coordinator (or his/her designee when the emergency coordinator is on call) know to do the following:

- (i) Activate internal facility alarms or communication systems? Y__ N__ NA__
- (ii) Notify appropriate state or local agencies with designated response roles if their help is needed? Y__ N__ NA__
- (iii) If a release has occurred, identify the source, character, amount and extent of any released materials by record review or chemical analysis? Y__ N__ NA__
- (iv) Assess hazards to human health and the environment, considering all direct and indirect effects? Y__ N__ NA__
- (v) **If the emergency coordinator determines that the facility has had a fire, explosion or release which could threaten human health or the environment outside the facility, Does the coordinator know to:**
 - (aa) Determine if local evacuation may be necessary, and, if so, notify appropriate local authorities and be available to assist local authorities in evacuation measures? Y__ N__ NA__
 - (bb) Notify the National Response Center (800-424-8802) and indicate his or her name and telephone number; name and address of the facility; time and type of incident; quantity of material(s) involved to the extent known; the extent of any injuries; and the possible hazards to human health or the environment outside the facility? Y__ N__ NA__
- (vi) Take all reasonable measures necessary to ensure that fires, explosions and releases do not occur, recur, or spread to other hazardous waste at the facility? These measures must include, where applicable, stopping processes and operations, collecting, and containing released waste, and removing or isolating containers Y__ N__ NA__
- (vii) If the facility stops operations in response to a fire, explosion or release, the emergency coordinator must monitor for leaks, pressure buildup, gas generation or ruptures in valves, pipes or other equipment, wherever this is appropriate? Y__ N__ NA__
- (viii) Immediately after an emergency, the emergency coordinator must provide for treating, storing or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire or explosion at the facility? Y__ N__ NA__
- (ix) Ensure that in the affected areas of the facility, no waste that may be incompatible with the released material is stored until cleanup procedures are completed and all emergency equipment is cleaned and restored to a useable condition? Y__ N__ NA__

Contingency Planning — Large Quantity Generators

308(b)(9)(F)

Whenever there is an imminent or actual emergency situation, Does the owner or operator know to do the following:

- (i) Notify the Secretary that the facility is in compliance with 7-308(b)(9)(E)(ix) before operations are resumed in the affected areas of the facility? Y ___ N ___ NA ___
- (ii) Maintain on file with the contingency plan a record of the time, date and details of any incident that requires implementing the contingency plan? Y ___ N ___ NA ___
- (iii) Submit a written report on the incident to the Secretary within 15 days after the incident? **Does the report (if applicable) include the following:**
 - (aa) Name, address and telephone number of the owner or operator? Y ___ N ___ NA ___
 - (bb) Name, address and telephone number of the facility? Y ___ N ___ NA ___
 - (cc) Date, time and type of incident (e.g., fire, explosion)? Y ___ N ___ NA ___
 - (dd) Name and quantity of material(s) involved? Y ___ N ___ NA ___
 - (ee) The extent of injuries, if any? Y ___ N ___ NA ___
 - (ff) An assessment of actual or potential hazards to human health or the environment, where this is applicable? Y ___ N ___ NA ___
 - (gg) Estimated quantity and disposition of recovered material that resulted from the incident? Y ___ N ___ NA ___

Comments: _____

Personnel Training - Large Quantity Generators

- §7-308(b)(10)(A) Have facility personnel successfully completed a program of classroom or on the job instruction that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of the regulations? Y__ N__ NA__
- §7-308(b)(10)(B) Is the personnel training program directed by a person trained in hazardous waste management procedures? Y__ N__ NA__
- §7-308(b)(10)(B) Does the personnel training program teach facility personnel hazardous waste management procedures relevant to the positions in which they are employed? Y__ N__ NA__
- §7-308(b)(10)(C) Does the training program ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems? Y__ N__ NA__
- §7-308(b)(10)(C) **Does the training include (where applicable) the following:**
- (i) Waste handling procedures? Y__ N__ NA__
 - (ii) Procedure for using inspecting, repairing and replacing facility emergency and monitoring equipment? Y__ N__ NA__
 - (iii) Key parameters for automatic waste feed cutoff systems? Y__ N__ NA__
 - (iv) Communications or alarm systems? Y__ N__ NA__
 - (v) Response to fires or explosions? Y__ N__ NA__
 - (vi) Response to groundwater contamination incidents? Y__ N__ NA__
 - (vii) Shutdown of operations? Y__ N__ NA__
- §7-308(b)(10)(D) Have facility personnel successfully completed the program within 6 months after their date of employment or assignment to a facility or to a new position at a facility? Y__ N__ NA__
- §7-308(b)(10)(E) Have facility personnel taken part in a review of initial training at least once per calendar year? Y__ N__ NA__
- §7-308(b)(10)(F) **Does the owner or operator maintain the following documents and records at the facility?**
- (i) The job title for each position at the facility related to hazardous waste management and the name of each employee filling each job? Y__ N__ NA__
 - (ii) A written job description for each position under §7-308(b)(10)(F) above which includes the requisite skill, education or other qualifications and duties of personnel assigned to each position? Y__ N__ NA__

Personnel Training - Large Quantity Generators

- (iii) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under §7-308(b)(10)(F)? Y__N__NA__
- (iv) Training records that document that the training or job experience required has been given to and completed by facility personnel in accordance with sections A through F above? Y__N__NA__
- (v) Are training records kept on current personnel until closure of the facility and on former employees for 3 years from the date the employee last worked at the facility? Y__N__NA__

Comments: _____

WASTE ACCUMULATION AND STORAGE - General

- §7-302(a) Has the generator avoided disposing of hazardous waste by evaporation? Y N__NA__
- §7-302(b) Has the generator not diluted hazardous waste? Y N__NA__
- §7-302(c) Has the generator avoided an unpermitted release of a hazardous material to the waters or land? Y N__NA__
- §7-311(g)(1) Are tanks used to store hazardous waste? If Yes Y__N NA__
If LQG, fill out Tank Checklist (the long one) and AA, BB, CC checklists, as applicable.
If SQG, fill out SQG Tank Checklist
- §7-311(h) (If LQG) Is the generator placing hazardous wastes on Drip Pads or in Containment Buildings? If yes, refer to 40 CFR Part 265 Subparts W and DD and Sections 262.34(a)(1)(iii) and (iv) for requirements. Y__N NA__

Comments: _____

Satellite Accumulation (for SQGs and LQGs)

(See table on page 15 to list satellite accumulation containers)

- §7-310(a) Does accumulation of hazardous waste in non-storage area(s) meet the following VHWMR requirements:**
- For each wastestream, is the generator accumulating less than one cubic yard of VT-listed non-liquid hazardous waste (waste **not** defined as hazardous in 40 CFR Part 261), or one quart of acutely hazardous waste, or 55 gallons of any other hazardous waste? Y__N__NA__
- In containers at or near any point of generation? Y__N__NA__
- Which is under the control of the operator of the process generating the waste? Y__N__NA__
- §7-310(a)(1) Are the waste and the container chemically compatible such that no leakage occurs? Y__N__NA__
- §7-310(a)(2) Is the container in good condition? Y__N__NA__
- §7-310(a)(3) Is the container located within a structure that sheds rain and snow and on an impervious surface? Y__N__NA__
- §7-310(a)(4) Is the container holding the waste closed except to add or remove waste? Y__N__NA__
- §7-310(a)(5) Is the container marked with the words "Hazardous Waste" and other words that identify the contents? Y__N__NA__
- §7-310(a)(8) Are full containers dated and moved to a short-term storage area within three days of becoming full? Y__N__NA__
- §7-310(b) Is the generator accumulating less than one cubic yard of VT-listed non-liquid hazardous waste, or one quart of acutely hazardous waste, or 55 gallons of any other hazardous waste in a short-term storage area? If yes:** Y__N__NA__
- §7-310(b)(1) Is the waste brought directly from the point of generation to the storage area by a trained employee, in a shift accumulation container marked with the words "hazardous waste" and the contents of the container, by the end of each work shift(≤12 hours)? Y__N__NA__
- §7-310(b)(2) Is the container managed in accordance with the short-term storage area requirements of **Section 7-311** (see pages 16 and 17)? Y__N__NA__
- §7-310(b)(3) Is each accumulation container in the short-term storage area marked to indicate that it is an accumulation container and as to its point of generation? Y__N__NA__

Short-Term Storage Area

(See table on page 18 or tear-off chart on back page to list containers in short-term storage)

Location of HW Storage Area(s): General Service Area Indoors Outdoors

- §7-307(a)(1) For Small Quantity Generators - Storage less than 180 days? Y N NA
- §7-307(c)(2) For Small Quantity Generators - Total accumulation on site less than 13,200 pounds (6000 Kg)? Y N NA
- §7-308(b)(2) For Large Quantity Generators - Storage less than 90 days? Y N NA

Short-Term Storage Area — Design and Operating Standards

- §7-311(a)(1) Impervious storage surface? Y N NA
- §7-311(a)(2) Structure to shed snow and ice? Y N NA
- §7-311(a)(4) Preventive measures for storage of freezable hazardous waste? Y N NA
- §7-311(a)(5) Is spill or fire control equipment required under §7-309(a)(1)(A) available in the vicinity of each short-term storage area? Y N NA
- §7-311(b)(1) & §7-311(f)(4)(D) iii Are containers or tanks holding incompatible hazardous wastes stored in the same enclosure, building or structure without being segregated in a manner that prevents the wastes from coming into contact with one another? Y N NA
- §7-311(b)(2) Is hazardous waste labeling visible on all containers? Y N NA
- §7-311(b)(3) Is aisle space at least 24 inches? Y N NA

Short-Term Storage Area - Security

- §7-311(e)(1) Is there a warning sign located at each storage area? HW Storage Area Y N NA
- §7-311(e)(2) Is a "No Smoking" sign posted for ignitable wastes in storage? Y N NA
- §7-311(e)(1&2) Are the signs visible from 25 feet? Y N NA
- §7-311(e)(1&2) For facilities bordering the province of Quebec, is the legend on the signs written in both English and French? Y N NA

*UV hangs at foot of stairs to TD office - No signs or labels
 Box list Quarterly ship mat in
 heritage*

Short-Term Storage Area

307(c)(9)(B) **FOR SQGs ONLY - Is the following information next to each telephone in the vicinity of where hazardous wastes are managed?**

- (i) The name and telephone numbers (office and home) of the emergency coordinator(s) Y N NA
- (ii) Location of fire extinguishers and spill control material, and, if present, fire alarm Y N NA
- (iii) The telephone number of the fire department (unless the facility has a direct alarm) Y N NA

center for All Phone too far away

Short-Term Storage Area - Containers

§7-311(f)(1) **Are containers used for short-term storage cleared labeled with the following:**

- Generator's name, address and EPA ID number? Y N NA
- Name and hazardous waste ID number of the waste in the container? Y N NA
- Date when the container was first used to accumulate or store hazardous waste? Y N NA
- "Hazardous Waste - Federal Law Prohibits..." language? Y N NA

§7-311(f)(4)(A) Is the container holding the waste closed except to add or remove waste? Y N NA

§7-311(f)(4)(B) Are any containers holding hazardous waste **not** opened, handled or stored in a manner which may rupture the container or cause it to leak? Y N NA

Open 5 Gall Pail

§7-311(f)(4)(C) Are any containers holding ignitable or reactive waste located greater than 50 feet from the property line? Y N NA

§7-311(f)(4)(D)i Has the generator avoided placing incompatible wastes/materials into the same container? Y N NA

§7-311(f)(4)(D)ii Has the generator avoided placing waste into an unwashed container that previously held an incompatible waste or material? Y N NA

Short-Term Storage Area - Inventory & Inspection

checklist fixed H

§7-311(d)(1) Is a current hazardous waste inventory maintained at a location apart from the short term storage area? Y N NA

§7-311(d)(2) Are daily inspections conducted at each short-term storage area? Y N NA

§7-311(d)(2) Are daily inspection records kept for at least 3 years? Y N NA

§7-311(d)(2) Is a current inspection checklist maintained for each storage area? Y N NA

Who performs inspections? Tim Davidson

§7-311(d)(2) Does the daily inspection checklist contain the following items:

(A) Condition of Drums? Y N NA

(B) Safety and Emergency Equipment? Y N NA

(C) Aisle Space? Y N NA

(D) Problems Encountered/Corrective Actions? Y N NA

(E) Date of Inspection/Inspector's Signature? Y N NA

Preparedness & Prevention

§7-309(a) Is the facility maintained and operated to minimize the possibility of fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, groundwater, or surface water which could threaten human health or the environment? Y N NA

§7-309(a)(1) Is the facility equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment specified below:

(A) An internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel? Y N NA

(B) A device, such as a telephone, immediately available at the scene of operations, or a hand held two-way radio, capable of summoning emergency assistance from local police departments, fire departments or state or local emergency response teams? Y N NA

(C) Portable fire extinguishers, fire control equipment (including special extinguishing equipment such as that using foam, inert gas or dry chemicals), spill control equipment and decontamination equipment? Y N NA

(D) Water at adequate volume and pressure to supply water hose streams or foam producing equipment, or automatic sprinklers or water spray systems? Y N NA

§7-309(a)(2) Are all communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment, where required, must be tested and maintained as necessary to assure its proper operation in time of emergency? Y N NA

§7-309(a)(3)(A) Whenever hazardous waste is being poured, mixed, spread, or otherwise handled, do all personnel involved in the operation have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee (unless such a device is not required)? Y N NA

Preparedness & Prevention

309(a)(3)(B) If there is ever just one employee on the premises while the facility is operating, does that employee have immediate access to a device, such as a telephone (immediately available at the scene of operation) or a hand-held two-way radio, capable of summoning external emergency assistance (unless such a device is not required)? Y__ N__ NA

§7-309(a)(4) Did the generator make the following arrangements as appropriate for the type of waste handled and the potential need for the services of these organizations, or document refusal of any authorities to enter into such arrangements:

(A) Arrangements to familiarize police departments, fire departments, and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where the facility personnel would normally be working, entrances to roads inside the facility, and possible evacuation routes? Y N__ NA__

(B) Agreements designating primary emergency authority to a specific police department and a specific fire department and agreements with any others to provide support to the primary emergency authority? Y N__ NA__

(C) Agreements with emergency response teams, emergency response contractors and equipment suppliers? Y N__ NA__

(D) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility? Y N__ NA__

Comments: _____

SUMMARY

Comments or concerns (see also Closing Conference Log): _____

Photos taken, including time, location, and subject: _____

Material provided during the visit:

- ___ Notification of Regulated Waste Activity package (needs to notify if no EPA ID # or if info. has changed)
- ___ Vermont Hazardous Waste Management Regulations (VHWMR)-9/30/98 version (yellow cover)
- ___ Generator Handbook
- ___ DEC Office of Environmental Assistance brochures (pollution prevention compliance assistance)
- ___ Generator Status Comparison Table

Fact Sheet(s):

- | | |
|--|--|
| ___ Antifreeze | ___ Plating P ² Options Checklist |
| ___ Autobody shop fact sheet (from WA state) | ___ Printing P ² Options Checklist |
| ___ Coolant & Cutting Oil P ² Options Checklist | ___ Vehicle Service Waste handbook |
| ___ Determining Regulatory Status | ___ VT Business Materials Exchange info |
| ___ Dry Cleaning-Hazardous waste generation | ___ Waste Mercury-Containing Lamps |
| ___ Laundering Haz. Waste-Contaminated Rags | ___ Waste Oil Burning fact sheet |
| ___ Metal Coating P ² Options Checklist | ___ Waste Oil P ² Options Checklist |
| ___ Oil Filters | ___ Wood Finishing P ² Options Checklist |
| ___ Oily Wastes | ___ Universal Wastes (<input type="checkbox"/> VT <input type="checkbox"/> EPA) |
| ___ Parts Cleaning P ² Options Checklist | ___ Other _____ |
| ___ PCB Contaminated Lighting Ballasts | |

MON	
TUE	

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31			

APPROPRIATE RECORDS OF THE

STATE OF ARIZONA

Vermont Agency of Natural Resources / Department of Environmental Conservation
MULTIMEDIA INSPECTION COVER PAGE

FACILITY INFORMATION

1. Facility Name STANDARD REGISTER INC Date FEB 14, 2002
2. Mailing Address 1741 ROUTE 7 SOUTH
MIDDLEBURY VT 05753 DEC PIN N^o RU02-0053
3. Facility Phone N^o (802) 388-7911
4. Responsible Official GEORGE WENDEL Title PLANT MANAGER
5. Contact Name PAULINE SINGLEY Title HR MANAGER
Primary Activity PRE-PRINTED FORMS
Physical location/Directions to facility (attach map w/ location marked): ROUTE 7 SOUTH FROM
MIDDLEBURY CENTER OF TOWN 3 MILES - EAST SIDE OF ROAD

INSPECTOR INFORMATION

Inspector #1 Name JOHN MILLER Ext. N^o 34817
Inspector's primary program: Air RCRA UST WW
Inspector #2: N/A // OR: _____ Ext. N^o _____
Inspector's primary program: Air RCRA UST WW
Screening inspection performed for: N/A Air RCRA UST WW
Minutes spent on mm checklist 10 ± Minutes spent on program screening inspection NA

NOTE: This multimedia checklist and any screening inspection form which may accompany this cover sheet were used by the DEC inspector to evaluate compliance with the issues covered by these forms. The inspection was not intended as a complete audit of all DEC requirements.

IF REQUESTING PIN NUMBER: (information above in italics is also used for PIN requests)

(The inspector may enter the applicable number from Facility Information, above, when completing this section)

PROGRAM I.D. N^o S-01-11-0 DATE OF PIN REQUEST: _____
LANDOWNER NAME: THE STANDARD REGISTER COMPANY PHONE: (____) _____
(LAST, FIRST, M.I.)
ADDRESS: 600 ALBANY STREET
DAYTON OHIO 45401
BUSINESS OWNER: THE STANDARD REGISTER COMPANY PHONE: (____) _____
(LAST, FIRST, M.I.)
ADDRESS: 600 ALBANY STREET
DAYTON OHIO 45401

To the inspector: Please forward completed cover page, map, multimedia inspection form and any screening inspection form(s) to Christine Thompson, ICE Coordinator, Env. Asst. Div, Laundry Bldg

MULTIMEDIA CHECKLIST

3/6/98

Air Quality

- 1. Is there any visible smoke being emitted from a smokestack or vent (dark enough to obscure anything behind the plume)?
2. Describe and note the locations of any of the following: Outdoor odors, Excessive dust, Open burning/incineration of waste material
3. Is a cold solvent degreasing/parts washing unit(s) in use?
If yes: Is it/are they closed when not in use? Label with operating instructions affixed?

Underground Injection Control

- 1. Are floor drains present? If yes: what is being discharged? where do they discharge?
2. Are stormwater drains present? If yes: where do they discharge?

Wastewater Discharge

- 1. Are there any hoses and/or portable pumps which might indicate the treatment process is being bypassed?
2. Are there any industrial/commercial discharge(s)? If yes, where does it go?
3. If visible, describe discharge (clear, turbid, colored, odoriferous)

Hazardous Waste

- 1. Are potentially hazardous wastes generated on-site? If yes, major waste streams:
2. Are there any containers/above ground tanks of hazardous waste(s)? If yes: are they closed?
3. Any evidence of release?

Underground Storage Tanks

- 1. Are there any underground storage tanks? If yes, N° 1 Age(s) Capacity 15,600 what is in the tank(s)? Fuel Oil



ATTACHMENT H

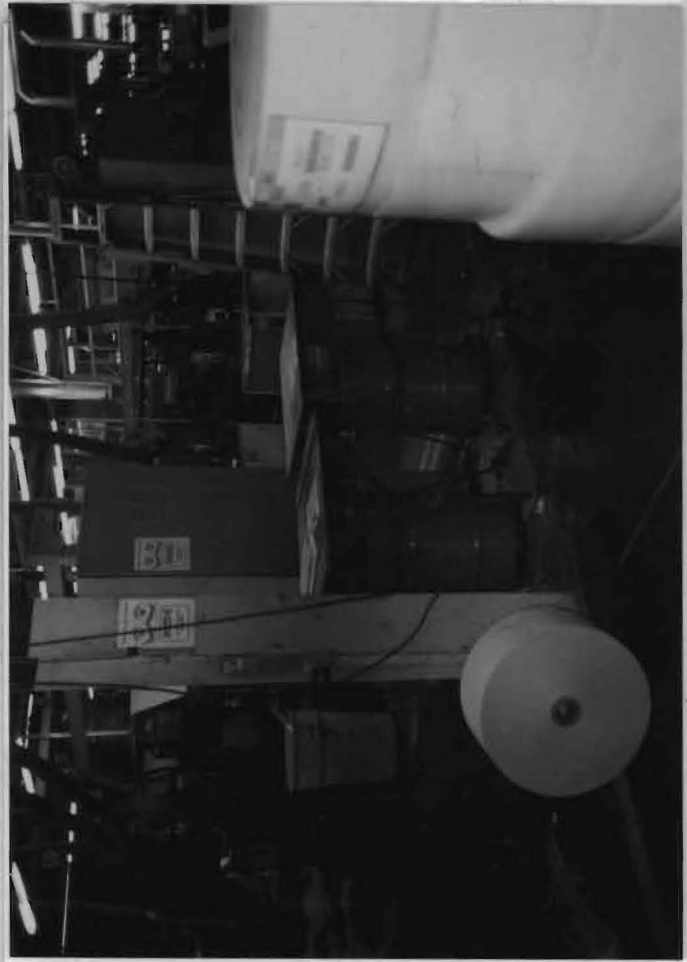


VERMONT DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Site Name: STANDARD REGISTER
City/Town: Middlebury Date: 2.14.02
File #: S-01-11-030 Time: ~ 2: PM
Photographer: J. Miller
Photo Description: Foot of stairs to Tim Dugan's
office boxes of used lamps taped
SWT BUT NO LABELS - NO SIGNS POSTED



Y T M 2 0 1 1 0 3 0



REGISTER

DATE	NAME	CITIZEN	REPRESENTING	STREET ADDRESS	CITY	Time of Arrival	Time of Departure	CALLING ON
1/5/01	Ken Quady	X	POSCO	Ballou Brook St.	Wilmington	11:00	11:20	Kris
1/5	BOB SHARP	X	PERDSI			2:40	2:50	VENDING REPAIR
1/8	Chris Whitman	X		Stoney Lonesome	Ti, N.Y.	8:53	9:45	Test
1/8	Rene' CHAWLER	✓		Cheney Road		9:12	10:47	Pauline Singley
1/8	Tom McNamee	-	Vermont	11 Gregory	Southern	9:26	10:30	Press Test.
1/8	Tom McCord	Y	IKON	Drive	Burlington	9:00	10:00	Sprogue
1/8	Tom Everest	Y		15 Main St	New Haven	9:30	11:20 AM	Press Test.
1/8	Doug Lord	Y		New Haven CT		10:45	12:15	Pauline Singley
1/8	Yang R. Comas	X		Box 43		12:50	1:50	WARD
1/8	JASON PETERS	X		Crown Point NY		1:00	2:06	WARD
1/8	James McBrien	X	EFC			2:00	2:50	Tim D.
1/8	David Chagnon	X	IKON			8:45	9:30	Betty Davis
1/9	Bradlee Peters	X		Rt 2 Box 2		8:52	10:22	Press Test.
1/9	Mike Thorne	X	UPS	Crown Point, NY	Williston	9:02	9:10	Pauline Singley
01-02-2001	GENE PETERCHAK	X	WILLIAMSTON	ELECTRICAL MOTORS		12:05	12:15	Lew of Tim
01/10/01	A. Barnett	X	ERC		Deul	9:22	10:05	H. Andrews.
1/10/01	C MARSHALL, SR	X	LOCKS			10:16	10:35	Kris Newton
1/10/01	M. MARSHALL	X	MARSHALL'S	LOCK		10:16	10:35	Kris Newton
1/10	G. Hogge	X	IP			11:35	12:15	K. Newton
1/10	D. Hot Brook	✓	MFD		mid	7:20p	8:25p	Tim + Pauline
"	S. Pleaf	✓	MFD					
"	B. Murray	✓	MFD					
"	T. Lapell	✓	MFD					
"	A. Klein	✓	MFD					
"	M. Ruff	✓	MFD					

Attachment 5

REGISTER

DATE	NAME	CITIZEN	REPRESENTING	STREET ADDRESS	CITY	Time of Arrival	Time of Departure	CALLING ON	
1/9	Pat Shaw	✓	MFD		midn	7:20	8:25p	Jim + Pauline	1/
1/10/01	Tom Sullivan	✓	MFD		midn	7:21			1/
1/10/01	DAVE Droughton	✓	MFD		MOD	7:21			1/
1/10/01	Donald Patterson	✓	MFD		midn	7:21			1/
-10-01	Ken Bummer	✓	MFD		Midn	7:22			1/
1-10-01	MIKE MAYONE	✓	"		"	"			1/
1-10-01	TODD A. DESABRAIS	✓	"		"	"			1/
-10-01	Paul Garrow	✓	"		"	"			1/
-10-01	Burton wedge	✓	"		"	"			1/
1/10/01	DAVID SHAW	✓	"		"	"			1/
1/10/01	JOSHUA NEWTON	✓	"		"	"			1/
1/10/01	Benjamin Merriner Pratt	✓	"		"	"			1/
1/10/01	Antonio J. Cocchiare	✓	ILCOM		midn	8:45	10:20	Copied Reports	1/
1/10/01	Jay Stollmann	✓	ARSON		S. Bore	10:15	10:20	TUM D.	1/
1/10/01	Jody Chalupa	✓	SAC			10:35	11:20	REUS	1/
1/11/01	Rick Breveknov	✓	ALFA	Wilmington MA		11:40	15:30	D. Kim B.	1/
1/11/01	CHRIS WHITMAN	✓	Seef	Tij, N.Y.		12:50	13:30	Pauline Singley	1/
1/12/01	Rick Breveknov	✓	ALFA	Wilmington MA		8:25	9:10	Darwin Kimball	1/
1/12/01	Jack Phelps	✓	Zee Medical	Bratt	VT	10:05	11:05	Pauline Singley	1/
1/15/01	W. G. H. J.	✓	CASCADE Corp			10	10:20	Chris Newton	1/
1/15/01	Doug Ladd	✓				12:45	2:05	Warren Smith	1/
1/15/01	W. G. H. J.	✓				11:50	2:05	Richard	1/
1/14/01	Douglas Bruce	✓	gmc	W. Lbs.	W. H.	3:35	4:10	Ken R.	1/
1/16	Tom Bygner	✓	A+V	NS		8:05	8:30	Darwin Kimball	1/

Manifest Info For Waste Shipped: 01/01/1999 - 12/31/2001

VTD004273488

STANDARD REGISTER CO THE RD 3 ROUTE 7 SOUTH, MIDDLEBURY

VT0111662	Shipped: 4/20/1999	To: HERITAGE ENVIRONMENTAL SERVI	Received: 4/20/1999
A	OIL/SORBS	300 P	VT02,
B	OIL	55 G	VT02,
CTF0552346	Shipped: 5/20/1999	To: UNITED INDUSTRIAL SERVICES INC	Received: 5/20/1999
A	STORM DRAIN WATER	700 G	NONE,
MAM275411	Shipped: 6/16/1999	To: SAFETY KLEEN (NORTH EAST)	Received: 6/16/1999
A	OIL WASTE	2100 P	VT02,
VT0118880	Shipped: 7/6/1999	To: HERITAGE ENVIRONMENTAL SERVI	Received: 7/7/1999
A	FLAMMABLE LIQ	40 G	D001,
VT0118896	Shipped: 7/21/1999	To: HERITAGE ENVIRONMENTAL SERVI	Received: 7/22/1999
A	XYLENE/TRIMETHYLBENZENE	30 G	D001,
VT0118992	Shipped: 8/6/1999	To: HERITAGE ENVIRONMENTAL SERVI	Received: 8/9/1999
A	OILY SORBS	600 P	VT02,
VT0118994	Shipped: 8/6/1999	To: HERITAGE ENVIRONMENTAL SERVI	Received: 8/9/1999
A	XYLENE/TRIMETHYLBENZENE	50 G	D001,
VT0119058	Shipped: 9/3/1999	To: HERITAGE ENVIRONMENTAL SERVI	Received: 9/4/1999
A	XYLENE/TRIMETHYLBENZENE	50 G	D001,
VT0097912	Shipped: 10/15/1999	To: HERITAGE ENVIRONMENTAL SERVI	Received: 10/18/1999
A	XYLENE/TRIMETHYLBENZENE	15 G	D001,
VT0098055	Shipped: 11/30/1999	To: HERITAGE ENVIRONMENTAL SERVI	Received: 12/1/1999
A	XYLENE/TRIMETHYLBENZENE	60 G	D001,
VT0098174	Shipped: 1/11/2000	To: HERITAGE ENVIRONMENTAL SERVI	Received: 1/12/2000
A	XYLENE/TRIMETHYLBENZENE	60 G	D001,
VT0098273	Shipped: 2/15/2000	To: HERITAGE ENVIRONMENTAL SERVI	Received: 2/15/2000
A	XYLENE/TRIMETHYLBENZENE	60 G	D001
VT0098304	Shipped: 3/2/2000	To: HERITAGE ENVIRONMENTAL SERVI	Received: 3/2/2000
A	OILY SORBS	200 G	VT02
B	FUEL OIL	50 G	VT02
VT0101098	Shipped: 3/31/2000	To: HERITAGE ENVIRONMENTAL SERVI	Received: 4/3/2000
A	XYLENE/TRIMETHYLBENZENE	60 G	D001
VT0101254	Shipped: 5/8/2000	To: HERITAGE ENVIRONMENTAL SERVI	Received: 5/8/2000
A	XYLENE/TRIMETHYLBENZENE	60 G	D001
VT0101450	Shipped: 6/21/2000	To: HERITAGE ENVIRONMENTAL SERVI	Received: 6/21/2000
A	XYLENE/TRIMETHYL BENZENE	60 G	D001
VT0100237	Shipped: 8/4/2000	To: HERITAGE ENVIRONMENTAL SERVI	Received: 8/7/2000
A	XYLENE/TRIMETHYLBENZENE	60 G	D001
VT0100449	Shipped: 9/15/2000	To: HERITAGE ENVIRONMENTAL SERVI	Received: 9/18/2000

WASTE STREAMS SHIPPED TO HERITAGE ENVIRONMENTA

WASTE STREAM COMMON NAME.	WASTE STREAM NO.
WASTE INK.	45435 - 1
WASTE OIL.	45435 - 3
WASTE ABSORBENT MATERIAL.	45435 - 2
WASTE ADHESIVE THERMOSEAL.	45435 - 9
WASTE ADHESIVE IMAGESEAL.	45435 - 10
WASTE UV WASH POSCO.	45435 - 4
WASTE FLORECENT BULBS 4FT.	45435 - 6
WASTE FLORECENT BULBS 48FT.	45435 - 7
WASTE ULTRAVIOLET LAMPS.	45435 - 8
WASTE ADHESIVE NOVA MELT.	45435 - 11



VERMONT AGENCY OF NATURAL RESOURCES
HAZARDOUS MATERIALS MANAGEMENT

103 South Main Street
Waterbury, Vermont 05671-0404
802-241-3866

In the event of a spill or emergency, contact the National Response Center 1-800-424-6042 and if within Vermont, the Vermont Department of Public Safety 1-800-641-5005.

FOR STATE USE ONLY

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. **VT D004273488** Manifest Document No. **27059**

2. Page 1 of 1 Information in the shaded areas is not required by Federal law, but may be required by State Law.

3. Generator's Name and Mailing Address (where returned manifests are managed)
**STANDARD REGISTER
1741 ROUTE 7, MIDDLEBURY, VT 05753**

4. Generator's Phone **802 388-7911**

5. Transporter 1 Company Name **HERITAGE-CRYSTALL CLEAN, LLC** 6. US EPA ID Number **1WR000004336**

7. Transporter 2 Company Name _____ 8. US EPA ID Number _____

9. Designated Facility Name and Site Address
**HERITAGE ENVIRONMENTAL SERVICES LLC
54 AVENUE D
WILLISTON, VT 05495** 10. US EPA ID Number **VT D98276537**

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

a.	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	Waste No.
RG, WASTE FLAMMABLE LIQUIDS, N.O.S., 3, UN1993, PG II, (XYLENE, TRIMETHYLBENZENE) (D001) ERG# 128					D001
b.					EPA STATE
c.					EPA STATE
					EPA STATE

J. Additional Descriptions for Materials Listed Above
a. **45435-4**

K. Handling Codes for Wastes Listed Above
a. Interim **S01** Final **T** c. Interim Final

15. Special Handling Instructions and Additional Information
**24 HOUR EMERGENCY PHONE #: (802)860-1200
1-800-827-5221**

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and all applicable State law and 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.

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: **Steve...** Signature: **[Signature]** Month Day Year: **02/20/01**

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: _____ Signature: _____ Month Day Year: _____

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted on Item 19.
Printed/Typed Name: _____ Signature: _____ Month Day Year: _____

COPY 8: GENERATOR RETAINS

VT 127059

INSTRUCTIONS FOR COMPLETING THE FEDERAL UNIFORM HAZARDOUS WASTE MANIFEST

IMPORTANT: READ ALL INSTRUCTIONS BEFORE COMPLETING THIS FORM. ALL 8 COPIES MUST BE LEGIBLE

State and Federal agencies, including Generators, Transporters, and Treatment, Storage and Disposal Facilities (TSDF's) to use this form for interstate and intrastate shipments of hazardous waste.

The manifest consists of 8 copies. ALL COPIES MUST BE LEGIBLE. Illegible manifests submitted to the State will be returned to the generator for correction. This form is designed for use as a 12 pitch (letter) typewriter. A firm ball point pen may also be used if you press down HARD. Each of the 8 copies must be filed with the appropriate party as it is completed. Copy distribution is as follows:

- COPY 1: FACILITY (TSDF) MAILED TO DESTINATION STATE. The original stays with the shipment from generator to disposal by the TSDF. When the manifest is completed, the TSDF must mail this copy to the State where the facility is located.
- COPY 2: FACILITY (TSDF) MAILED TO GENERATOR STATE. When the TSDF has completed his section of the manifest, he mails this copy to the State where the waste was generated.
- COPY 3: FACILITY (TSDF) MAILED TO GENERATOR. When the TSDF has completed his section of the manifest, he mails this copy back to the Generator of the waste, who must retain it on-site.
- COPY 4: FACILITY (TSDF) RETAINS. When the TSDF has completed his section of the manifest, he keeps this copy.
- COPY 5: TRANSPORTER 1 RETAINS. When the transporter has completed his section of the manifest, and transferred the waste to the TSDF, he keeps this copy for his records.
NOTE: If a continuing transporter is used, the first transporter is responsible for supplying him with a legible photocopy of the manifest, which must contain signatures, where required. If a thru transporter is used, a new or continuing manifest must be supplied and cross referenced.
- COPY 6: GENERATOR MAILED TO DESTINATION STATE. When the Generator has completed his section of the manifest and transferred his waste to the transporter, he mails this copy to the State where the designated facility (TSDF) is located.
- COPY 7: GENERATOR MAILED TO GENERATOR STATE. When the generator has completed his section of the manifest and transferred his waste to the transporter, he mails this copy to the State where the waste was generated.
- COPY 8: GENERATOR RETAINS. When the Generator has completed his section of the manifest and transferred his waste to the transporter, he keeps this copy for his records.

GENERATOR SECTION

- Item 1: GENERATOR'S US EPA ID NO.-MANIFEST DOCUMENT NO.-Enter the US EPA generator's 12 digit identification number. Then optionally, a unique 5 digit number you assign to this manifest. Use of serially increasing numbers, (eg 00001, 00002, etc.) is recommended.
- Item 2: PAGE # OF CONTINUATION SHEETS-Enter the total number of form-sets used to complete this manifest, i.e., the first form plus the number of additional manifests and/or Continuation Sheets, if any. NOTE: Additional forms are not to be used for additional waste streams (11 a-d) but only for entering continuing transporters.
- Item A: STATE MANIFEST DOCUMENT NUMBER-Number is preprinted, except on the Continuation Sheets. Enter this number under Item L on each Continuation Sheet attached to or part of a manifest. If a new manifest is used in lieu of it, cross reference each manifest with the original.
- Item 3: GENERATOR'S NAME AND MAILING ADDRESS-Enter the name and mailing address of the Generator. This address should be the location that will manage the returned manifest forms.
- Item 4: GENERATOR'S PHONE NUMBER-Enter a telephone number with area code where an authorized agent of the Generator can be reached in an emergency.
- Item B: GENERATION SITE-Enter the site name, street address, building, or other specific geographical locator, city, and state, of the generator's pick-up site (as notified to EPA) if different from the mailing address. Enter "SAME" if all elements are contained in the mailing address or enter only those that are missing or different.
- Item 5: TRANSPORTER 1 COMPANY NAME-Enter the company name (as notified to EPA) of the first transporter who will transport the waste.
- Item 6: US EPA ID NUMBER-Enter the US EPA 12 digit identification number of the first transporter identified in Item 5.
- Item C: TRANS 1 LIC. ST. PLATE # - Enter the State of registration and the license plate number of the waste-carrying portion of the vehicle being used to make the pickup.
- Item D: TRANS 1 PHONE-Enter a telephone number with area code where an authorized agent of the transporter can be reached.
- Item 7: TRANSPORTER 2 COMPANY NAME-If applicable, enter the company name (as notified to EPA) of the second transporter who will transport the waste. If more than two transporters will be used, use additional manifest(s) or Continuation Sheets as page 2 etc. and cross reference to each other.
- Item 8: US EPA ID NUMBER-If applicable, enter the US EPA 12 digit identification number of the transporter in Item 7.
- Item E: TRANS 2 LIC. ST. PLATE # - If applicable, enter the second transporter's State of registration and license plate number for the waste carrying portion of the vehicle being used to make the pick-up.
- Item F: TRANS 2 PHONE-If applicable, enter the second transporter's telephone number with area code where an authorized agent of the transporter can be reached.
- Item G: DESIGNATED FACILITY NAME AND SITE ADDRESS-Enter the company name (as notified to EPA) of the TSDF designated to receive the waste listed on this manifest. This address must be the site address, which may differ from mailing address.
- Item 10: US EPA NUMBER-Enter the US EPA 12 digit identification number of the designated TSDF listed in Item 9.

Item 9: STATE FACILITY'S ID NO. (Required)

Item H: FACILITY PHONE-Enter a telephone number with area code for the TSDF designated to receive the waste.

Item 11: US DOT DESCRIPTION-All of the following must be entered: The correct US DOT (Dept. of Transport) name for the waste as identified in 49 CFR Parts 171-177 (usually found in column 2 of section 172.101); the assigned DOT Hazard Class (usually in column 3) and the 4 digit UN/NA ID number (column 3A). (e.g.: Waste Acetone, Flammable liquid, UN 1090) US DOT requires the word "waste" before or in the shipping name for all hazardous waste. Generic or n.o.s. shipping names must include (within parentheses) the technical name of the hazardous material unless excepted (CFR 172.203 (k)). If neither RCRA nor state waste, describe it as "Non-Hazardous Waste" and specify here what it consists of.

Item 12: CONTAINERS (NO. & TYPE)-Enter the number of containers for each waste and the appropriate abbreviation.

- | | | |
|-----------------------------------|---|---|
| DM = Metal drums, barrels, kegs | DW = Wooden drums, barrels, kegs | DF = Fiberboard or plastic drums, barrels, kegs |
| TP = Tanks, portable | TT = Cargo tanks (tank trucks) | TC = Tank cars |
| DT = Dump truck | CY = Cylinders | CM = Metal boxes, cartons, cases and roll-offs |
| CW = Wooden boxes, cartons, cases | CF = Fiber or plastic boxes, cartons, cases | BA = Burlap, cloth, paper/plastic bags |

Item 13: TOTAL QUANTITY-Enter the total quantity of waste described on each line.

Item 14: UNIT (Wt./Vol.)-Enter the appropriate abbreviation listed (below) for the unit of measure used in determining the total quantity of waste described in each line. Do not use fractions.

- | | | |
|---------------------------|---------------------------|---------------|
| G = Gallons (liquid only) | L = Liters (liquids only) | P = Pounds |
| T = Tons (2000 lbs.) | Y = Cubic Yards | K = Kilograms |
| M = Metric Tons (1000kg) | N = Cubic Meters | |

Item I: WASTE NO. EPA-Enter the 4 digit EPA hazardous waste number as it appears in 40 CFR Part 261. Subparts C and D or "NONE", if a non-RCRA State-regulated wastestream is being manifested, enter the State waste code under "State". If both the Destination and Generator States have assigned codes use the Destination State code. If there is no State code, enter "none". If non-hazardous, both EPA and state must be coded "NONE".

Item J: ADDITIONAL DESCRIPTIONS FOR MATERIALS LISTED ABOVE-Enter the chemical or trade name(s), constituent percentages, specific gravity (if other than 1.0) etc. If you entered a state designated waste code in Item I, provide description, or note any applicable EPA Hazard Codes (Ignitable (I), Corrosive (C), Reactive (R), EP Toxic (E), Acute Hazardous (H), or Toxic (T)). Indicate if spill related, tank bottoms, ground water recovery or other special circumstances.

Item 15: SPECIAL HANDLING INSTRUCTIONS AND ADDITIONAL INFORMATION-Use this space to indicate special transportation, treatment or storage. If an alternate facility (TSDF) is designated, note it here. For international shipments, Generators must enter as point of departure or entry, the U.S. City and State through which the waste must travel. This space may also be used for emergency response telephone numbers and other information the Generator wishes to include about the shipment.

Item K: HANDLING CODES-TSDF completes this section. The generator and the TSDF must agree on the final disposal method to be used and enter its code in section K under "Final". See "DESIGNATED FACILITY (TSDF) SECTION" below.

Item 16: GENERATOR'S CERTIFICATION-The Generator must read, sign (by hand) and date the certification (with date of transfer to transporter). If a mode other than highway is used, the word "highway" should be lined out and the appropriate mode (rail, water, or air) inserted. Primary exporters shipping hazardous wastes to a facility located outside of the United States must add to the end of the first sentence of the certification the following words "and conforms to the terms of the attached EPA Acknowledgement of Consent to the shipment". In signing the waste minimization certification statement, those generators who have not been exempted by statute or regulation from the duty to make a waste minimization certification under section 3002(b) of RCRA are also certifying that they have complied with the waste minimization requirements. Generators may preprint the words, "On behalf of" in the signature block or may hand write this statement in the signature block prior to signing the generator certifications.

TRANSPORTER SECTION

Items 17/18: TRANSPORTER ACKNOWLEDGEMENT-Print or type the name of the person accepting the waste on behalf of the Transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

DESIGNATED FACILITY (TSDF) SECTION

Item K: HANDLING CODES-TSDF should complete. If the "Designated Facility" in item 9 is not the point of "final" disposition of the waste, select the method of handling at your location from the following list and enter in "Interim". The generator is required to come to an agreement with his waste handlers on the final method of disposal and the TSDF who signs off the manifest must enter the proper code in "FINAL" and carry through with the agreement to dispose accordingly.

- | | | | | |
|--|---------------------|------------------------|---------------------------|---------------------|
| STORAGE: S01 (Containers) | S02 (Tank) | S03 (Waste pile) | S04 (Surface Impoundment) | S05 (Other Specify) |
| TREATMENT: Refer to 40 CFR part 264 Appendix 1 Table 2 or 40 CFR part 265 Appendix 1 Table 2 | | | | |
| DISPOSAL: D80 (Injection Well) | D81 (Landfill) | D82 (Land Application) | D83 (Ocean disposal) | D84 (Surface Imp) |
| | D85 (Other-Specify) | | | |

Item 19: DISCREPANCY INDICATION SPACE-The authorized representative of the designated facility's owner or operator must note in this space any significant discrepancy between the waste described on the manifest and the waste actually received at the facility. Any rejected materials should be listed here, along with an indication of the disposition of the rejected materials. Any applicable Discrepancy or Exception reporting requirements must also be complied with. Federal and State regulations may vary.

Item 20: FACILITY OWNER OR OPERATOR CERTIFICATION-Print or type the name of the person accepting the waste on behalf of the owner or operator of the designated TSDF. That person must acknowledge acceptance of the waste described on the manifest by signing (by hand) and entering the date of receipt. The signature of the authorized TSDF agent indicates acceptance of (except for items specified in item 19) and agreement with statements on this manifest.

*NOTE: FOR INTERSTATE SHIPMENTS YOU MAY BE REQUIRED TO COMPLY WITH THE MANIFESTING REQUIREMENTS OF BOTH THE DESTINATION AND GENERATOR STATES REGARDING THE COMPLETION OF SPECIFIC INFORMATION INCLUDED IN LETTERED ITEMS A-K.

Public reporting burden for this collection of information is estimated to average: 37 minutes for generator, 15 minutes for transporter, 10 minutes for treatment storage and disposal facility. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden, to CHIEF, INFORMATION POLICY BRANCH PM-223, U.S. ENVIRONMENTAL PROTECTION AGENCY, 401 MAIN STREET SW, WASHINGTON, D.C. 20460, and the OFFICE OF INFORMATION AND REGULATORY AFFAIRS, OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, D.C. 20503.

RECORDS RETENTION GROUP
HERITAGE ENVIRONMENTAL SERVICES, LLC
TREATMENT/DISPOSAL SERVICES GROUP
7901 W. MORRIS ST.
INDIANAPOLIS, IN 46231

VERM

Feb 15, 2001

TIM D'AVIGNON
STANDARD REGISTER
1741 ROUTE 7 SOUTH
MIDDLEBURY, VT 05753

GENERATOR:
STANDARD REGISTER
1741 ROUTE 7 SOUTH
MIDDLEBURY, VT 05753

In accordance with the Heritage Waste Analysis Plan and as required by federal environmental regulations (40 CFR 264.13 and 268.7), a periodic evaluation of all active wastestreams approved into a Heritage facility must be performed. The purpose of the evaluation is to determine if any physical or chemical changes have occurred in the process generating each wastestream. All wastestreams for which the generating process has changed will be re-evaluated. Wastestreams will be canceled if no response is received by Heritage. Please return this ENTIRE form to the address at the top of the page or fax to (317) 486-2580. If you have any questions or would like additional information, please contact your Technical Sales Representative or Customer Service at 800/827-0476.

If your generating process has changed AND you want to keep this wastestream active, a sample kit will be sent to your attention. This must be returned, tested, and approved before you can send your next shipment.

The following wastestreams have been shipped to Heritage within the last 12 months or are new wastestreams that have been profiled, but have not been shipped in the last 12 months.

For each wastestream listed below, please circle the appropriate answer.

Wastestream #	Common Name/ Generating Process	Has the generating Process changed?
45435-1	WASTE INK PRINTING PRESS	yes <input checked="" type="radio"/> no
45435-2	ABSORBENT/OIL CLEAN UP OIL SPILL/INK SPILLAGE	yes <input checked="" type="radio"/> no
45435-3	GEAR OIL OIL CHANGE FROM GEAR BOXES	yes <input checked="" type="radio"/> no
45435-4	UV WASH CLEANING ROLL PRESS	yes <input checked="" type="radio"/> no

(continued on next page)

Wastestream #	Common Name/ Generating Process	Has the generating Process changed?
45435-5	PASTE INK UNUSED	yes <input checked="" type="radio"/> no
45435-6	4 FOOT FLUORESCENT LIGHT BULBS SPENT	yes <input checked="" type="radio"/> no
45435-7	8 FOOT FLUORESCENT LIGHT BULBS SPENT	yes <input checked="" type="radio"/> no
45435-8	ULTRAVIOLET LAMPS SPENT	yes <input checked="" type="radio"/> no
45435-9	THERMOSEAL ADHESIVE ADHESIVE CLEANING & UNUSED PRODUCT	yes <input checked="" type="radio"/> no
45435-10	IMAGE SEAL ADHESIVE ADHESIVE CLEANING & UNUSED MATERIAL	yes <input checked="" type="radio"/> no

I certify the above information, to the best of my knowledge and belief, is true and accurate.

Tom D'Angelo *Maint Mgr* *3-20-01*
Signature Title Date

62801



HERITAGE ENVIRONMENTAL SERVICES, LLC
WASTESTREAM SURVEY FORM

Heritage Form HERWS01

Heritage Use Only	
Quote #	Approval Fee
Wst#	P.O.
Sample #	Heritage Contact

Preferred Service Location:

Indianapolis, IN <input type="checkbox"/>	Charlotte, NC <input type="checkbox"/>	Kansas City, MO <input type="checkbox"/>	Lemont, IL <input type="checkbox"/>	Coolidge, AZ <input type="checkbox"/>	Williston, VT <input checked="" type="checkbox"/>
(800)827-4374	(800)827-4374	(800)829-4374	(800)827-4374	(520)723-4167	(877)436-6776

1. GENERATOR INFORMATION

Generator Name Standard Register
 Address Rt. 7 South
 City, State, Zip Middlebury, VT 05753
 Tech. Contact Name _____
 Phone (802) 388-7911 Fax 802-388-3654
 E-mail Address _____
 US EPA ID Number VTD004273488
 State ID Numbers _____
 LQG SQG CESQG Non-hazardous only
 SIC Code (if known): _____

2. BILLING INFORMATION Quote to: Generator
 Customer Other
 Customer Name Crystal Clean
 Address 3970 W. 10th Street, Suite A
 City, State, Zip Indianapolis, IN 46222
 Contact Name Cindy Scoulding
 Phone (317) 390-3658 Fax (317) 486-5087
3. MANIFEST MAIL ADDRESS Generator Billing
 Contact Name Tim D'Avignon
 Company Name Standard Register
 Address 1741 Rt. 7 South
 City, State, Zip Middlebury, VT 05753

4. Was wastestream generated under any of the following SIC Codes: 2911 (Petroleum Refining), 28 (Chemical and Allied Products), 3312 (Steel Works, Blast Furnaces [including Coke Ovens], and Rolling Mills) Yes No

5. Common Name UVWash

6. Process Generating Waste Cleaning Roll Press

7. DOT Description (if available) RD Waste Flammable Liquid, N.O.S. 3, UN1993 PG II
 (Xylene, Trimethylbenzene)

8. Chemical Composition: Using specific chemical names, list all constituents present in the wastestream. Attach available analyses or MSDSs. Remember to identify Form R/TRI Toxic Chemicals. Total composition must equal or exceed 100%.

Constituent	Range	Units
<u>2 Butyl Ethanol</u>	<u>55-75</u>	
<u>Aliphatic Pet Distillates</u>	<u>20-30</u>	
<u>Aromatic Petroleum Distillates</u>	<u>30-40</u>	
<u>(Trimethylbenzene, Xylene, Cumene)</u>		

9. Identify US EPA waste codes D001

10. US EPA Form Code B203 US EPA Source Code A58

11. Identify state waste codes _____

12. Color White Appearance _____ Odor _____

13. %Solids 0-2% %Liquids 98% %Ash _____

14. Physical State at 70 °F Solid Liquid Sludge Semi-solid Powder Gas
 If liquid, how many layers does the wastestream exhibit? Single layer Double layer Multi-layer NA
 If solid, are there free liquids? Yes No (If no, will waste dump from the drum? Yes No
 Is the wastestream pumpable? Yes No

15. pH or pH range (If wastestream is solid, give pH of 10% slurry): _____
 Flash Point: <100°F 100-140°F 141-200°F >200°F
 Boiling Point: <100°F >100°F
 Fuel Value (Btu/lb): <2000 2000-6000 6000-10,000 >10,000
 Specific Gravity: <0.8 0.8-1.0 1.1-1.3 >1.3

Common Name (same as Item #5): **62801**

16. Does the wastestream contain asbestos? Yes No
 If Yes, is the asbestos friable? Yes No
 Does the wastestream contain human sanitary, biological, or infectious waste? Yes No
 Does the wastestream contain dioxins or furans or dioxin-precursors? Yes No
 Does the wastestream contain radioactive wastes? Yes No
 Does the wastestream contain PCBs? Yes No If Yes, what concentration? _____ ppm
 Is the wastestream air reactive, autogignitable, pyrophoric or spontaneously combustible? Yes No
 Is the wastestream water reactive? Yes No
 Does the wastestream present other compatibility concerns? Yes No If yes, specify _____
 Is the wastestream dusty? Yes No

17. List all Attachments _____

18. Disposal Restrictions/Special Handling _____

19 a. Transporter: Heritage Transport Other
 24 Hour Emergency Number 1-800-827-5221
 If transporter is not Heritage Transport, complete the following:
 Transporter Name Crystal Clean #10064
 Address _____
 City, State, Zip _____
 Contact/Phone _____
 US EPA ID No. _____

19b. Packaging:
 Bulk Solid Bulk Liquid
 Container
 Container Type Drum
 Container Size 30
 Annual Volume (units) _____

20. CERTIFICATION (Initial or enter NA in the blank preceding each certification. Sign and date the overall certification.)

NA Used Oil Certification: I hereby certify that the wastestream described in this survey meets the definition of used oil at 40 CFR 279.1 and has not been mixed with hazardous waste. Any hazardous constituents contained therein result from and are incident to normal use of the oil.

NA Commercial Product Certification: I hereby certify that the wastestream described in this survey is a commercial virgin, off-specification, outdated, obsolete, unsalable, or unusable product and no waste material has been mixed herein. (A material safety data sheet is required.)

I hereby certify that all information submitted herein and attached contains true, accurate and complete descriptions of this waste. Any sample submitted for analysis is representative of the waste material being offered for approval. All relevant information regarding known or suspected hazards in the possession of the generator has been disclosed. I have reviewed the physical facilities, administrative practices, and operational procedures (or have directed the completion of such a review) and based on this review do willingly make this certification. I authorize Heritage to obtain a sample from any waste shipment for purposes of recertification. I will notify Heritage Environmental Services, LLC if the generator status or any other information on this form changes.

Jan D'Angelo 6-8-99 Standard Register Co.
 Signature Date Company

If wastestream carries F001, F002, F003, F004, and/or F005, identify concentration with units for each constituent:

Acetone	<u>N/A</u>	2-Ethoxyethanol	<u>N/A</u>	2-Nitropropane	<u>N/A</u>
Benzene	<u>N/A</u>	Ethyl Acetate	<u>N/A</u>	Pyridine	<u>N/A</u>
n-Butyl Alcohol	<u>N/A</u>	Ethyl Benzene	<u>N/A</u>	Tetrachloroethylene	<u>N/A</u>
Carbon Disulfide	<u>N/A</u>	Ethyl Ether	<u>N/A</u>	Toluene	<u>N/A</u>
Carbon Tetrachloride	<u>N/A</u>	Isobutanol	<u>N/A</u>	1,1,1-Trichloroethane	<u>N/A</u>
Chlorobenzene	<u>N/A</u>	Methanol	<u>N/A</u>	1,1,2-Trichloroethane	<u>N/A</u>
Cresol (m and p)	<u>N/A</u>	Methylene Chloride	<u>N/A</u>	Trichloroethylene	<u>N/A</u>
o-Cresol	<u>N/A</u>	Methyl Ethyl Ketone	<u>N/A</u>	1,1,2-Trichloro-1,2,2-trifluoroethane	<u>N/A</u>
Cyclohexanone	<u>N/A</u>	Methyl Isobutyl Ketone	<u>N/A</u>	Trichlorofluoroethane	<u>N/A</u>
1,2-Dichlorobenzene	<u>N/A</u>	Nitrobenzene	<u>N/A</u>	Xylenes (total)	<u>N/A</u>

System Type: M141	Total Alkalinity:	TOC: <u>21090</u>	Halogens: <u>0</u>	Sulfides:	Zn:
Hex Chrome:	Total Acidity:	HOC:	Cyanides:	Ni:	

Complete for Williston, VT or Coolidge, AZ

Toxicity Characteristic Constituents Provide the TCLP results for the following constituents in mg/l:

D004 Arsenic	<u>BRL</u>	D014 Methoxychlor	<u>BRL</u>	D024 m-Cresol	<u>BRL</u>	D034 Hexachloroethane	<u>BRL</u>
D005 Barium	<u>BRL</u>	D015 Toxaphene	<u>BRL</u>	D025 p-Cresol	<u>BRL</u>	D035 Methyl Ethyl Ketone	<u>BRL</u>
D006 Cadmium	<u>BRL</u>	D016 2,4-D	<u>BRL</u>	D026 Cresol	<u>BRL</u>	D036 Nitrobenzene	<u>BRL</u>
D007 Chromium	<u>BRL</u>	D017 2,4,5-TP(Silvex)	<u>BRL</u>	D027 1,4-Dichlorobenzene	<u>BRL</u>	D037 Pentachlorophenol	<u>BRL</u>
D008 Lead	<u>BRL</u>	D018 Benzene	<u>BRL</u>	D028 1,2-Dichloroethane	<u>BRL</u>	D038 Pyridine	<u>BRL</u>
D009 Mercury	<u>BRL</u>	D019 Carbon Tetrachloride	<u>BRL</u>	D029 1,1-Dichloroethylene	<u>BRL</u>	D039 Tetrachloroethylene	<u>BRL</u>
D010 Selenium	<u>BRL</u>	D020 Chlordane	<u>BRL</u>	D030 2,4-Dinitrotoluene	<u>BRL</u>	D040 Trichloroethylene	<u>BRL</u>
D011 Silver	<u>BRL</u>	D021 Chlorobenzene	<u>BRL</u>	D031 Heptachlor	<u>BRL</u>	D041 2,4,5-Trichlorophenol	<u>BRL</u>
D012 Endrin	<u>BRL</u>	D022 Chloroform	<u>BRL</u>	D032 Hexachlorobenzene	<u>BRL</u>	D042 2,4,6-Trichlorophenol	<u>BRL</u>
D013 Lindane	<u>BRL</u>	D023 o-Cresol	<u>BRL</u>	D033 Hexachloroethane	<u>BRL</u>	D043 Vinyl Chloride	<u>BRL</u>

Printed: Thursday 02/08/01 08:34

HERITAGE ENVIRONMENTAL SERVICES
Generator Wastestream Approval Listing

TSD	TSD City	Transprt	Quote#	Prod MS #	Common Name	DOT Description	Waste Codes
HERITAGE E WILLISTON	HERITAGE T	HERITAGE T	163226-1	117 45435-1	WASTE INK	NON-DOT/NON-RCRA REGULATED (INK) (VT99)	
HERITAGE E WILLISTON	HERITAGE T	HERITAGE T	166826-1	101 45435-2	ABSORBENT/OIL	NON-DOT/NON-RCRA REGULATED (OILY ABSORBENTS) (VT02)	
HERITAGE E WILLISTON	HERITAGE T	HERITAGE T	166827-1	68 45435-3	GEAR OIL	NON-DOT/NON-RCRA REGULATED (GEAR OIL) (VT02)	
HERITAGE E WILLISTON	HERITAGE-C	HERITAGE-C	170451-2	68 45435-4	UV WASH	RQ, WASTE FLAMMABLE LIQUIDS, N.O.S., 3, UN1993, PG II, (XYLENE, TRIMETHYLBENZENE) (D001) ERG# 128	
HERITAGE E WILLISTON	HERITAGE T	HERITAGE T	184636-1	68 45435-5	PASTE INK	NON-DOT/NON-RCRA REGULATED (PASTE INK) (VT99)	
HERITAGE E WILLISTON	HERITAGE T	HERITAGE T	190166-1	68 45435-5	PASTE INK	NON-DOT/NON-RCRA REGULATED (PASTE INK) (VT99)	
HERITAGE E WILLISTON	HERITAGE T	HERITAGE T	192624-1	109 45435-6	4 FOOT FLUORESCENT LIGHT BULBS	ENVIRONMENTALLY HAZARDOUS SUBSTANCES, SOLID, N.O.S., 9, UN3077, PG III, (UNIVERSAL WASTE - FLUORESCENT LIGHT BULBS) ERG# 171	
HERITAGE E WILLISTON	HERITAGE T	HERITAGE T	192625-1	109 45435-7	8 FOOT FLUORESCENT LIGHT BULBS	ENVIRONMENTALLY HAZARDOUS SUBSTANCES, SOLID, N.O.S., 9, UN3077, PG III, (UNIVERSAL WASTE - FLUORESCENT LIGHT BULBS) ERG# 171	
HERITAGE E WILLISTON	HERITAGE T	HERITAGE T	192626-1	109 45435-8	ULTRAVIOLET LAMPS	ENVIRONMENTALLY HAZARDOUS SUBSTANCES, SOLID, N.O.S., 9, UN3077, PG III, (UNIVERSAL WASTE - MERCURY CONTAINING LAMPS) ERG# 171	
HERITAGE E WILLISTON	HERITAGE T	HERITAGE T	206672-1	68 45435-9	THERMOSEAL ADHESIVE	NON-DOT/NON-RCRA REGULATED (THERMOSEAL ADHESIVE) (VT99)	
HERITAGE E WILLISTON	HERITAGE T	HERITAGE T	206673-1	68 45435-10	IMAGE SEAL ADHESIVE	NON-DOT/NON-RCRA REGULATED (IMAGE SEAL ADHESIVE) (VT99)	

(wsapprlst.sql)

Thursday 08-FEB-01 08:32

HERITAGE ENVIRONMENTAL SERVICES
 Generator Quotation Listing
 STANDARD REGISTER MIDDLEBURY, VT TSD 15501

Page: 1

Quote	Price#	Comp	Loc	Entered	Status	Wastestream	Common Name	Prod Description	Proc Syst	Effective
Disposal	Disposal	Rate	Unit	Freight	Freight					
				Rate	Rate					
				Unit	Unit					
163226	1	HTC	WI	15-FEB-99	APPROVED	45435-1	WASTE INK	117 MASS BURN		15-FEB-99
250.0000	55	GAL	DRM	50.0000	LOAD					
166826	1	HTC	WI	14-APR-99	APPROVED	45435-2	ABSORBENT/OIL	101 SUBT D LANDFILL		14-APR-99
130.0000	55	GAL	DRM	50.0000	LOAD					
166827	1	HTC	WI	14-APR-99	APPROVED	45435-3	GEAR OIL	68 SUPP FUEL DRUMS		14-APR-99
130.0000	55	GAL	DRM	50.0000	LOAD					
170451	2	HTC	WI	09-JUN-99	APPROVED	45435-4	UV WASH	68 SUPP FUEL DRUMS		12-NOV-99
94.0000	55	GAL	DRM	.0000						
184636	1	HTC	WI	14-FEB-00	APPROVED	45435-5	PASTE INK	68 SUPP FUEL DRUMS		14-FEB-00
450.0000	BOX			50.0000	LOAD					
190166	1	HTC	WI	15-MAY-00	APPROVED	45435-5	PASTE INK	68 SUPP FUEL DRUMS		15-MAY-00
250.0000	55	GAL	DRM	50.0000	LOAD					
192624	1	HTC	WI	27-JUN-00	APPROVED	45435-6	4 FOOT FLUORESCENT LIGHT BULBS	109 LIGHT BULBS		27-JUN-00
1.0000	BULB			50.0000	LOAD					
192625	1	HTC	WI	27-JUN-00	APPROVED	45435-7	8 FOOT FLUORESCENT LIGHT BULBS	109 LIGHT BULBS		27-JUN-00
2.0000	BULB			50.0000	LOAD					
192626	1	HTC	WI	27-JUN-00	APPROVED	45435-8	ULTRAVIOLET LAMPS	109 LIGHT BULBS		27-JUN-00
4.0000	EACH			50.0000	LOAD					
206672	1	HTC	WI	23-JAN-01	APPROVED	45435-9	THERMOSEAL ADHESIVE	68 SUPP FUEL DRUMS		23-JAN-01
150.0000	55	GAL	DRM	50.0000	LOAD					
206673	1	HTC	WI	23-JAN-01	APPROVED	45435-10	IMAGE SEAL ADHESIVE	68 SUPP FUEL DRUMS		23-JAN-01
150.0000	55	GAL	DRM	50.0000	LOAD					

Middlebury Waste Streams

(genqt.sql)

CONFIDENTIAL



Press
MAINT

310 Ballardvale Street, Wilmington, Mass. 01887-1097

Mass. Trade Secret No: 00-000-000

Material Safety Data Sheet (MSDS). May be used to comply with OSHA Hazard Communication Standard 29CFR 1910.1200. Standard must be consulted for specific requirements. U.S. Department of Occupational Safety & Health Administration (Non-Mandatory Form) Form approved. OMB No. 1218-0072.

IDENTITY (As used on Label and List): Note: Blank spaces are not permitted. If any item is not applicable, or no information is available, the space must be so marked.

UV SPECIAL X (Blanket Polishing) **PRODUCT CODE NO: P5794**

Manufacturer's Name:
PRINTERS OIL SUPPLY CO., INC.
Address:
310 Ballardvale Street, Wilmington, MA 01887

Emergency Phone No: 508-658-5290
24 Hour Emergency: (800)424-9300
Telephone Number For Information: 508-658-5290
Issue Date: 06/21/95

Signature of Preparer: (Optional):

PRODUCT NAME: UV SPECIAL X ID NUMBER: NA1993

PRODUCT CODE NO: P5794 DOT HAZARD CLASSIFICATION: 3, COMBUSTIBLE LIQUID

DOT PROPER SHIPPING NAME: CLEANING COMPOUND C.A.S. NUMBER: MIXTURE

SECTION I - HAZARDOUS INGREDIENTS AND EXPOSURE LIMITS:

INGREDIENTS	C.A.S. NUMBER	EXPOSURE LEVELS			PERCENTAGE
		PPM	AGENCY	TYPE	
Propylene glycol methyl ether	107-98-2	100	ACGIH/OSHA	TWA	
		150	ACGIH	STEL	
Diacetone alcohol	123-42-2	50	ACGIH/OSHA	TWA	

Specific Chemical identities withheld under Trade Secret Status
Does not contain substances which must be reported under the requirements of SARA Title III-313 and 40 CFR372.

SECTION II - EMERGENCY AND FIRST AID PROCEDURES:

EYE CONTACT:

If irritation or redness from vapor exposure develops, move victim away from exposure source. If irritation or redness persists, seek Medical attention. For direct contact, hold eyelids apart and flush affected eye(s) with clean water for 20 minutes. Seek Medical attention.

SKIN CONTACT:

Remove contaminated clothing. Cleanse affected area(s) thoroughly by washing with mild soap and water. If irritation or redness develops and/or persists, seek Medical attention.

159

PRODUCT NAME: POSCO UV SPECIAL X

PRODUCT CODE NO: P5794

PAGE 2 OF 4

INHALATION (BREATHING):

If respiratory or other overexposure symptoms develop, move victim away from exposure source into fresh air. If symptoms persist, seek immediate Medical attention. If victim is not breathing, artificial respiration should be administered. If breathing difficulty is experienced, Oxygen should be administered by qualified personnel. Seek Medical attention.

INGESTION (SWALLOWING):

Aspiration Hazard: Do not induce vomiting or give anything by mouth. Vomited material can enter the lungs and cause lung damage. If victim is drowsy or unconscious, place on left side, with head down. If possible, do not leave victim unattended.

COMMENTS (Note to Physician):

Epinephrine and other sympathomimetic drugs may potentiate arrhythmia in persons exposed to this substance. Such drugs should be used cautiously, if at all, and only with cardiac monitoring.

SECTION III - HEALTH HAZARDS AND ROUTES OF ENTRY:

EYE CONTACT:

This material will irritate the eyes. Direct contact with the liquid or exposure to the vapor or mist may cause tearing, stinging and redness.

SKIN CONTACT:

This material may cause skin irritation. Prolonged or repeated exposure to this material may cause redness, burning and cracking or drying of skin. Contact may result in skin absorption, but toxicity symptoms via this route are unlikely, under normal conditions. Persons with pre-existing conditions may be more susceptible to the effects of this material.

INHALATION (BREATHING):

While this material has a low degree of toxicity, inhaling of large amounts of mists or vapors may cause irritation of mucous membranes, nervous system depression (drowsiness, fatigue, motor coordination loss), nausea and headaches. Prolonged or repeated exposure to mists or vapor may damage peripheral nerves. Respiratory symptoms, associated with pre-existing conditions, may be exaggerated upon exposure to this material.

INGESTION:

While this material has a low degree of toxicity, ingestion of excessive amounts may cause irritation of the digestive tract. Signs of nervous system depression (dizziness, fatigue, drowsiness, motor coordination loss) and nausea may develop.

COMMENTS:

This material has not been identified as a carcinogen, or probable carcinogen by NTP, IARC or OSHA. Pre-existing peripheral nerve disorders may be aggravated by exposure to this material. Persons with pre-existing heart disorders may be more susceptible to irregular heartbeats if exposed to high concentrations of this material (See Section II-Note to Physician). Reports have associated repeated and/or prolonged exposures to solvents with permanent brain or nervous system damage (sometimes referred to as Solvent or Painter's Syndrome). Intentional misuse by deliberately concentrating and inhaling this material may be harmful or fatal.

P21

SECTION IV - SPECIAL PROTECTION INFORMATION:

VENTILATION:

If existing ventilation is inadequate to maintain airborne concentration below prescribed exposure limits (See Section I), additional ventilation or exhaust systems may be needed.

RESPIRATORY PROTECTION:

If airborne concentrations exceed prescribed exposure limits, use a respirator or gas mask, with appropriate cartridges and canisters (NIOSH approved), or mask with an air supply.

PROTECTIVE GLOVES:

We recommend the use of gloves which are impermeable to the specific hazardous materials present in this product.

SECTION V - REACTIVITY DATA:

STABILITY: Stable

INCOMPATIBILITY (Materials to avoid): Strong acids or bases, strong oxidizers, amines

HAZARDOUS POLYMERIZATION: Will not occur

HAZARDOUS DECOMPOSITION: Will not occur

SECTION VI - SPILL OR LEAK PROCEDURES:

PRECAUTIONS IN CASE OF RELEASE OR SPILL:

Stay upwind from spill. Keep all ignition sources away from spill area. Ventilate spill area. Absorb with absorbent. Keep out of waterways.

WASTE DISPOSAL METHOD:

Dispose of in accordance with all Local, County, State and Federal regulations.

SECTION VII - STORAGE AND SPECIAL PRECAUTIONS:

HANDLING AND STORAGE PRECAUTIONS:

Keep containers closed in a cool environment. Avoid all sources of heat, spark, or other ignition. Use and store with proper ventilation. Avoid direct contact or inhalation of vapors. Practice good hygiene. "Empty" containers can be dangerous and should be so treated. Do not pressurize, cut, weld, braze, solder, drill, grind, or expose to heat, sparks, or other ignition sources; they may explode and cause injury or death. Empty drums should be properly drained and returned to Supplier or to a drum reconditioner. All other containers should be disposed of in an environmentally sound manner.

SECTION VIII - FIRE AND EXPLOSION HAZARD DATA:

HAZARD CLASS	HEALTH:	1	<u>HAZARD RATING SCALE</u> 0=minimal 1=slight 2=moderate 3=high 4=extreme
	FLAMMABILITY:	2	
	REACTIVITY:	0	
	PERSONAL PROTECTION:	B	

EXPLOSIVE LIMITS (Volume %): LOWER: 1.1 UPPER: 13.8 FLASH POINT (TCC): >110°F

EXTINGUISHING MEDIA:

Dry chemical, carbon dioxide, universal type foam.

FIRE AND EXPLOSION HAZARDS:

Flashback along vapor trail may occur. This material is **COMBUSTIBLE** and should not be used near heat, spark, or flame, or static electricity. If container is properly cooled, it may explode in case of fire.

FIRE FIGHTING PROCEDURES:

Use of Self Contained Breathing Apparatus (SCBA) is recommended for Firefighters. Water spray may be useful to cool nearby containers and to minimize vapor. Avoid spreading burning liquid with the cooling water.

SECTION IX - PHYSICAL DATA:

Approximate Boiling Point:	275°F	Vapor Density:	>3.12
Evaporation Rate (n-butyl acetate=1.0):	.40	% Volatile:	100
Vapor Pressure (in mm mercury):	4.4	% Water soluble:	100
Specific Gravity:	0.929 (7.73 lb/gal)	Odor:	characteristic
Appearance:	clear liquid	Melting Point:	NA
pH:	NA	V.O.C. (lb/gal):	7.73

DISCLAIMER OF EXPRESSED AND IMPLIED WARRANTIES:

Information contained herein is believed to be accurate as of the issue date. However, no Warranty of Merchantability, Fitness for any purpose, or any other warranty is expressed or to be implied regarding the accuracy or completeness of this information, or the product, or hazards relating to its use. This information and product are furnished on the condition that the person receiving them shall make his own determination as to the suitability of the product for his particular purpose and on the condition that he assume the risk for his use thereof.

John Miller

From: "June Middleton" <JUNEM@dec.anr.state.vt.us>
To: Christ,
Johnm
Date sent: Mon, 29 Apr 2002 14:54:42 -0500
Subject: Standard Register
Priority: normal

Hello,

I have a copy of a multi media inspection for the above named. Yes the 15K tank is registered with us, it is not however inside a concrete vault. The tank was installed in 1993 and is a double wall fiberglass jacketed tank. Tank is used exclusively for on premises heating.

the facility ID# is 3887911.

June

Kathy Perkins

From: rick.oberkirch@anrmail.anr.state.vt.us
To: Kathy Perkins <kathyp@dec.anr.state.vt.us>
Date sent: Wed, 24 Apr 2002 11:15:00 -0400
Subject: Standard Register
Priority: normal

Hello Kathy.
Sorry, I thought I had sent this to you already.

PIN # RU02-0053
Date: 4/12/02

D.E.C. PROGRAM: RCRA
PROGRAM I.D.:S01-11-004
PROGRAM CONTACT: John Miller
LANDOWNER NAME: The Standard Register Company
PHONE: ()
ADDRESS: 600 Albany Street, Dayton, OH 45401
BUSINESS OWNER: The Standard Register Company
PHONE: ()
ADDRESS: 600 Albany Street, Dayton, OH 45401

FACILITY NAME: Standard Register, Inc
1741 Route 7 South, Middlebury, VT 05753
PHONE: (802) 388-7911
Responsible Official: George Wendel, Plant Manager
Contact Person: Pauline Singley, H.R. Manager
LOCATION: I91 northbound, Route 7 South from Middlebury,
center of
town, 3 miles east side of road
PROJECTDESCRIPTION: Pre-printed forms

From: "Singley, Pauline N" <Pauline.Singley@standardregister.com>
To: 'John Miller' <JOHNM@dec.anr.state.vt.us>
Subject: RE: Accumulation
Date sent: Wed, 20 Feb 2002 11:26:40 -0500
<Pauline.Singley@standardregister.com>

Thank you John!

Also, I was wondering how I would go about obtaining 2 more copies of the green manual of regs?

Is there a website to order from or a number I could call for this?

Also, you mentioned a good chemical dictionary you liked to use? Could you share that book's title? I'd like to get one for my office.

Thanks so much for all your help!

Pauline

Pauline Singley, SPHR
Human Resources Manager
1741 Route 7 South
Standard Register Company
Middlebury, Vermont 05753
802-382-2231
Fax: 802-388-3654
pauline.singley@standardregister.com

-----Original Message-----

From: John Miller [mailto:JOHNM@dec.anr.state.vt.us]
Sent: Tuesday, February 19, 2002 4:02 PM
To: pauline.singley@standardregister.com
Subject: Accumulation

see attached (GENERIC ACCUMULATION TECH NOTE)

John Miller

From: "Singley, Pauline N" <Pauline.Singley@standardregister.com>
To: "john.miller@anrmail.anr.state.vt.us"
<john.miller@anrmail.anr.state.vt.us>
Copies to: "Wendel, George A" <George.Wendel@standardregister.com>,
"Davignon, Timothy J" <Timothy.Davignon@standardregister.com>
Subject: Source Description for SRC Middlebury Plant
Date sent: Fri, 29 Mar 2002 15:03:24 -0500
<Pauline.Singley@standardregister.com>

Dear John,

Here is our Source Description so far. <<Source Description of Wastes
March 2002.doc>>

The two paragraphs in question are paragraphs 9 & 10 on Waste gear oil and
unused inks.

I am following up with Heritage to find out for sure what they do with our
used oil and unused inks.
We will get a confirmation in writing on both.

Anything you can find out about the ink and recycling will be most helpful!

Hope you have a fabulous Easter weekend!

Pauline

Pauline Singley, SPHR
Human Resources Manager
1741 Route 7 South
Standard Register Company
Middlebury, Vermont 05753
802-382-2231
Fax: 802-388-3654
pauline.singley@standardregister.com

Standard Register Company
Middlebury, Vermont
March 13, 2002

SOURCE DESCRIPTION:

Standard Register Company (SRC) was established in Middlebury in 1966; approximately 188 employees work three shifts/day, five and one half days/week. The facility manufactures custom business forms.

SRC use 24 offset printing presses to produce forms ranging in format from simple one color/one page forms to collated multicolor forms many pages in length. These forms may also be customized to meet specific needs of clients; options include numbering, hole punching, folding and gluing. The aluminum plates used in the printing process are for offset litho printing technology.

There are three hazardous waste streams generated at SRC; these include oil soaked pigs/sorbents (VT 02), waste stoddard solvent (VT02) and ultraviolet wash solvent (VT02).

The oil soaked pigs and sorbent are generated by the clean up of leaks from the machines in the facility and are sent out to a laundry service.

The waste stoddard solvent (mineral spirits) is generated by cleaning the ink rollers of the presses. This waste is generated slowly because the solvent evaporates quickly and is used infrequently at the facility. SRC generates approximately one to two drums per year.

Waste parts washing solvent is generated from the numbering machine parts cleaning process. The Crystal Clean (CC) unit is serviced approximately every six weeks. An aqueous parts cleaner is used for cleaning the numbering machines.

UV Wash is generated by press and roller wash and collected at UV Wash parts washer stations and then manifested out every six weeks as hazardous waste through Heritage. SRC generates 480 gallons per year.

Other non-hazardous waste streams generated at SRC include waste gear oil, unused inks, 4 foot and 8 foot fluorescent light bulbs, waste adhesives and waste coatings, rags, and silver.

Waste gear oil is generated from leaks from the machines in the facility and in manifested out as non-hazardous waste through Heritage on a hazardous waste manifest (VT99). SRC generates a maximum of 110 gallons of waste oil per year.

Unused inks not contaminated with any other substance are shipped out through Heritage as regulated non-hazardous waste on a Bill of Lading. The inks are recycled into facility processes that use black ink. SRC ships out approximately two drums of these unused inks (left in the original cans) per year.

SOURCE DESCRIPTION, continued, page 2
Standard Register Company, Middlebury, Vermont
March 13, 2002

Light bulbs are shipped out as non-hazardous universal waste to Heritage on a Bill of Lading.

Waste adhesives and waste coatings are shipped out as a regulated non-hazardous waste to Heritage on a Bill of Lading.

Rags are picked up by Coyne Textile and laundered; exempt according to Agency policy.

Silver is captured in a silver recovery unit attached to SRC's film processor/developer. The silver unit is exchanged periodically for a new unit with the Marcor Environmental Services of Franklin, Illinois.



ADDISON COUNTY SOLID WASTE MANAGEMENT DISTRICT
P.O. Box 573, ROUTE 7 SOUTH
MIDDLEBURY, VT 05753

FEB 8 2002

Date: February 4, 2002

ADDISON
BRIDPORT
CORNWALL
FERRISBURGH
GOSHEN
LEICESTER
LINCOLN
MIDDLEBURY
MONKTON
NEW HAVEN
ORWELL
PANTON
RIPTON
SHOREHAM
STARKSBORO
VERGENNES
WALTHAM
WEYBRIDGE
WHITING

To: District Staff

CC: Chris Wagner, ANR

John Miller, ANR

Casella Waste Management

Pauline Singley, Fred Schoolcraft, Standard Register

From: Laura Routh, ACSWMD *Lur*

RE: Release Notice regarding Standard Register's load on 2-4-02

During the week of January 21st, the District office received word from transfer station staff that Standard Register's (SR) load had contained what appeared to be odorous black liquid which flowed freely from several plastic bags. The presence of this material was never formally documented; the load in which this material allegedly appeared was transported to the landfill.

I spoke to SR staff and they indicated that the material in question was (Stoddard) solvent and press wash. I explained to SR that these materials were likely hazardous waste and therefore unacceptable for disposal as solid waste. At that point, District staff put SR on notice that future loads would be carefully inspected to insure that they were free from hazardous wastes.

SR is a small quantity generator; the District cannot legally manage their hazardous wastes. Per V.S.A. title 10, Chapter 159, 6615(e): in the event that the District becomes aware of a known infraction of State or Federal hazardous waste regulations, we are compelled to notify the State and exercise due diligence in preventing release or improper disposal, particularly as it relates to the use of our facility.

On Monday, February 4th, Casella brought a compactor load of SR's garbage to the transfer station. During the unloading and inspection of this compactor, District staff noticed several plastic garbage bags that were unusually heavy and appeared to contain both ink and residual materials as free liquid. However, because of the sheer volume of the compactor load, and the rate at which waste was released from compactor, it was difficult for staff to positively identify the materials in question. After several borderline inky bags were captured and one such bag made it into the hopper, the unloading was stopped. Per our protocol, both the State and SR were immediately notified: the load appeared to contain unacceptable materials.

All of the material that had been in the hopper was placed in a lined roll-off. During the transfer of said material, several additional inky bags were removed for inspection. Staff noted numerous containers covered with waste ink. One such container clearly held >3%

(802) 388-2333 • FAX (802) 388-0037

PRINTED ON RECYCLED PAPER

FEB 8 2002

WASTEWATER TREATMENT DISTRICT
ADDRESS ON CORNER
P.O. BOX 273
MUNICIPALITY



residual ink. There were two bags that seemed to have a strong solvent odor. No bags or containers of free liquid were found. Because we had reason to believe that the wastes in question were F-listed, the material in the roll off and the remaining material in the compactor was returned to Standard Register for their inspection, processing and proper disposal.

I explained to the SR staff that before the District would allow any of the waste to be returned to the Transfer Station for disposal, SR needed to provide acceptable analytical results (TCLP or otherwise, depending on the waste stream) for waste ink, press wash, used absorbents and other materials. In the event that SR was unable to obtain appropriate analytical results, I indicated that all the materials in question would need to be handled as hazardous waste.

To the best of our knowledge, no release occurred.

If there are questions regarding this incident, please feel free to call the District, 388-2333.



FEB 11 2002

ADDISON COUNTY SOLID WASTE MANAGEMENT DISTRICT
P.O. Box 573, Route 7 South
MIDDLEBURY, VT 05753

February 8, 2002

ADDISON
BRIDPORT
CORNWALL
FERRISBURGH
GOSHEN
LEICESTER
LINCOLN
MIDDLEBURY
MONKTON
NEW HAVEN
ORWELL
PANTON
RIPTON
SHOREHAM
STARKSBORO
VERGENNES
WALTHAM
WEYBRIDGE
WHITING

Ms. Pauline Singley SPHR
Human Resources Manager
Standard Register Company
1741 Route 7 South
Middlebury, VT 05753

Dear Pauline:

Based on the information you sent me (attached), Standard Register's solid waste will be accepted at the Transfer Station for disposal under the following conditions:

- Any ink cans or waste ink that is included in your loads will be only **Kohl & Madden Magnetic Black** with no added solvents or other potentially hazardous additives.
- This and all future Standard Register wastes will comply with all State and Federal Hazardous Waste regulations including 40CFR and VSA Title 10 chapter 159.
- Any and all liability relating to this and future Standard Register loads remain the sole responsibility of Standard Register.

As with any loads that come into the Transfer Station, these loads will continue to be subject to our inspection process. Should any other brands or colors of ink be disposed of with these loads, we will reserve the right to require MSDS sheets or other analytical information prior to acceptance of the waste.

Thank you for your help in working towards a solution on this issue. Please give me a call if you have any questions regarding these conditions.

Sincerely,

Kathleen M. Johnson
Acting District Manager

cc: ✓ John Miller, ANR Hazardous Waste Compliance Division
Tom Badowski, WSI Landfill
Scott Olson, Casella Waste Management

(802) 388-2333 • FAX (802) 388-0037
Printed on Recycled Paper



MATERIAL SAFETY DATA SHEET

In compliance with the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard as published in the Code of Federal Regulations 29 CFR 1910.1200.

DATE:

1-8-02

PREPARED BY:

RL

ATR88-768

Page:

MAGNESIUM MAGNETIC BLACK

1. Batch #: FW 111841 Qty: 10# LBS

Date: 01/08/02

Hazard Rating: H-1, F-1, R-0, EMERGENCY # (770)-368-1234
Kohl & Madden, 6403 Warren Drive, Norcross GA 30093

WARNING: THIS PRODUCT CAN CAUSE EYE AND SKIN IRRITATION. SEE MATERIAL SAFETY DATA SHEET FOR DETAILED INFORMATION.
The merchandise herein contained is sold without warranties implied or expressed. Claims not exceeding purchase price may be allowed if presented within five days after receipt of goods. These conditions shall not be waived other than in writing.

2. HAZARDOUS INGREDIENTS

This product contains no reportable substances as defined under Occupational Safety & Health Administration's Health Communication Standard (29 CFR 1910.1200).

3. HAZARDS IDENTIFICATION

Emergency Overview: Product may cause skin and eye irritation.

PRODUCT HMIS RATINGS: H F R

0 0 0

HMIS Rating Definition: H = Health F = Flammability R = Reactivity
0 = Minimal, 1 = Slight, 2 = Moderate, 3 = Serious, 4 = Severe

4. FIRST AID MEASURES

Eye Contact: Flush eyes thoroughly with sterile eye wash solution. Seek medical attention if irritation persists.

Skin Contact: Wash skin with soap and water. Seek medical attention if irritation persists.

Inhalation: Remove to fresh air if breathing is difficult. Seek medical attention if difficulty persists.

Ingestion: Ingestion is considered to be an unlikely route of exposure. However, if ingestion occurs, seek medical attention

5. FIRE FIGHTING MEASURES

OSHA: Class III B (Combustible)

Extinguishing Media: Carbon dioxide, dry chemical, or foam recommended. Apply water spray to cool exposed containers.

Fire Hazard: Fire or excessive heat may produce hazardous decomposition products.

Flammability Data: Flash Point: Greater than 215 degrees F. (Closed Cup Method, ASTM D3278-82)

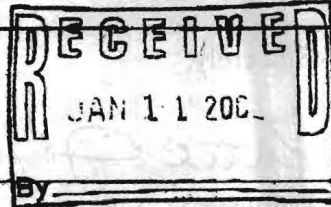
6. ACCIDENTAL RELEASE MEASURES

Clean up with absorbent material. Transfer to appropriate containers for disposal.

7. HANDLING AND STORAGE

Handling: Avoid contact with skin, eyes, or clothing. Wash hands after use.

Storage: Store in closed containers away from direct sources of heat.



8. EXPOSURE CONTROLS AND PERSONAL PROTECTION

Ventilation: The use of local exhaust is desirable.

Personal Protection: If prolonged contact is anticipated, use barrier skin cream.

Exposure Limits: There are no established OSHA permissible exposure limits (PEL) or American Conference of Government Industrial Hygienists (ACGIH) threshold limiting values (TLV) for this product.

9. PHYSICAL AND CHEMICAL PROPERTIES

Vaporization Rate: Slower than water **Odor:** Oily **Solubility:** Insoluble in water **Boiling Range:** Greater than 500 degrees F.

10. STABILITY AND REACTIVITY

Stability: This product is a stable mixture. Decomposition is not anticipated.

Compatibility: This product is not compatible with water-based materials.

Hazardous Decomposition Products: Noxious gases may be evolved in a fire.

To comply with O.S.H.A. regulations
M.S.D.S. sheets must be kept on file
DO NOT THROW AWAY !!

FORM: OS-1

27



February 7, 2002

Ms. Pauline Singley SPHR
Human Resources Manager
Standard Register Company
Route 7 South
Middlebury, VT 05753

Dear Ms. Singley:

This letter is in response to your request on the compliance of the Kohl & Madden inks supplied to your location in regard to 40CFR261.31 and the F list contained within this regulation.

The inks as supplied to Standard Register in Middlebury Vermont do not contain any of the materials on the referenced list.

Concerning the list of K&M products sold to your location, I was sent only the products sold over the last six months, July 2001 to January 2002. Please let me know if this would be sufficient or whether you require a total list for the year 2001. The list I have is quite extensive and would require sending by mail.

I trust this information will satisfy your requirements. If I can assist you further in this matter, please let me know.

Sincerely,

John Daugherty
Technical Director

Cc
Ken Allaby
Chris Boyd
Len DiLeo

27

MATERIAL SAFETY DATA SHEET

In compliance with the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard as published in the Code of Federal Regulations 29 CFR 1910.1200.

PREPARED BY: RO

Page: 2

1. TOXICOLOGICAL INFORMATION

General: This product is a mixture of several ingredients. There are no established OSHA permissible exposure limits (PEL) or American Conference of Government Industrial Hygienists (ACGIH) threshold limiting values (TLV) for this product.

Special Conditions Aggravated by Exposure: None known.

Acute (Short-term) Toxicity: No adverse effects known.

Chronic (Long-term) Toxicity: No adverse effects known.

Mutagenicity: This product contains no reportable known or potential carcinogens listed by the National Toxicology Program (NTP) or the International Agency for Research on Cancer (IARC). Materials contained in this product are not OSHA regulated under 29 CFR 1910 Subpart Z.

2. DISPOSAL CONSIDERATIONS

General: This product should be disposed of in accordance with applicable federal, state, and local regulations.

Waste Management: This product is not considered a RCRA hazardous waste under 40 CFR 261, and is not regulated under CERCLA (Superfund).

3. TRANSPORTATION INFORMATION

Domestic States:

O.T. Shipping (49 CFR 172.101-102).....: Not Regulated

O.T. Hazard Class (49 CFR 172.101-102)...: None

O.T. Label.....: None

O.T. Placard.....: None

Full Label Description.....: Printing Ink

International:

United Nations/North American Number.....: Not Regulated

International Maritime Dangerous Goods Classification: Not Regulated

International Air Transport Association Classification: Not Regulated

4. REGULATORY INFORMATION

OSHA Hazard Communication Standard Status: This product is not considered to be a hazardous substance under OSHA's Federal Hazard Communication Standard 29 CFR 1910.1200.

Toxic Substances Control Act (TSCA) Status: All ingredients are certified to be materials or mixtures listed on the U.S. TSCA Inventory.

Superfund Amendments and Reauthorization Act (SARA) Title III:

Section 302 Extremely Hazardous Substances (40 CFR 355).....: None

Section 311/312 OSHA Hazardous Chemicals.....: None

Section 313 Toxic Chemicals and Chemical Categories (40 CFR 372)...

Barium Compounds % by Weight: 0

Copper Compounds % by Weight: 0

Zinc Compounds % by Weight: 0

Resource Conservation and Recovery Act (RCRA):

This product contains no reportable hazardous substances (40 CFR 261.33) and does not exhibit the characteristics of hazardous waste (40 CFR 261.20-.24).

California Proposition 65 Regulated Substances:

This product does not contain any known concentrations of regulated substances.

MEG Status:

This product is formulated to be in compliance with COMEG Model Legislation for Packaging and Packaging Ink Components.

The information and recommendations for this product are believed to be accurate. Since this product may be used under conditions beyond our control, no warranty, expressed or implied, is made with respect to the use of this product. Kohl & Madden Printing Ink Corporation assumes no liability or responsibility for personal injury or property damage caused by the product. Users assume all risks associated with the use of this product.

FORM: OS-1

FS



February 8, 2002

Chief of Hazardous Waste Program
Attn: John Miller
103 South Main Street
West Building
Waterbury, Vermont 05671-0404

RE: Standard Register's Disposal of Solid Waste

Dear Mr. Miller,

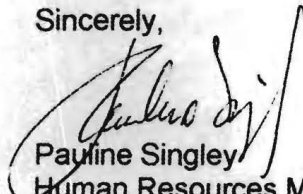
Thank you for your assistance and direction in regards to the processing of solid waste from our facility to the Addison County Solid Waste District.

As a follow-up to our conversation of February 4, 2002, we have taken the following steps:

- Researched the composition of the ink used by our facility. (See enclosed letter from our ink supplier)
- Sorted the waste left in the suspect compactor and found it to be free of hazardous waste.
- Sent the District copies of the MSDS for ink and a copy of the letter from the ink supplier. (See enclosed MSDS.)
- Received letter from Kathleen Johnson, ACSWD, indicating that the solid waste from our facility will be accepted as long it is free from hazardous materials and remains in compliance with all State and Federal hazardous waste regulations.

Again, thank you for your help in this matter. Please call me if you need more information on this matter.

Sincerely,


Pauline Singley
Human Resources Manager
Standard Register Company

Cc: George Wendel, Plant Manager, SRC

Encs (2)



February 7, 2002

Ms. Pauline Singley SPHR
Human Resources Manager
Standard Register Company
Route 7 South
Middlebury, VT 05753

Dear Ms. Singley:

This letter is in response to your request on the compliance of the Kohl & Madden inks supplied to your location in regard to 40CFR261.31 and the F list contained within this regulation.

The inks as supplied to Standard Register in Middlebury Vermont do not contain any of the materials on the referenced list.

Concerning the list of K&M products sold to your location, I was sent only the products sold over the last six months, July 2001 to January 2002. Please let me know if this would be sufficient or whether you require a total list for the year 2001. The list I have is quite extensive and would require sending by mail.

I trust this information will satisfy your requirements. If I can assist you further in this matter, please let me know.

Sincerely,

John Daugherty
Technical Director

Cc
Ken Allaby
Chris Boyd
Len DiLeo



MATERIAL SAFETY DATA SHEET

In compliance with the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard as published in the Code of Federal Regulations 29 CFR 1910.1200.

DATE: 1-8-02

PREPARED BY: RO

ATR88-768

Page: 1

MAGNASOY MAGNETIC BLACK

1. Batch #: FW 111841 Qty: 10# LBS
 Date: 01/08/02
 Hazard Rating: H-1, F-1, R-0, EMERGENCY # (770)-368-1234
 Kohl & Madden, 6403 Warren Drive, Norcross GA 30093

WARNING: THIS PRODUCT CAN CAUSE EYE AND SKIN IRRITATION. SEE MATERIAL SAFETY DATA SHEET FOR DETAILED INFORMATION. The merchandise herein contained is sold without warranties implied or expressed. Claims not exceeding purchase price may be allowed if presented within five days after receipt of goods. These conditions shall not be waived other than in writing.

2. HAZARDOUS INGREDIENTS

This product contains no reportable substances as defined under Occupational Safety & Health Administration's Health Communication Standard (29 CFR 1910.1200).

3. HAZARDS IDENTIFICATION

Emergency Overview: Product may cause skin and eye irritation.

PRODUCT HMIS RATINGS: H F R

0 0 0

HMIS Rating Definition: H = Health F = Flammability R = Reactivity
0 = Minimal, 1 = Slight, 2 = Moderate, 3 = Serious, 4 = Severe

4. FIRST AID MEASURES

Eye Contact: Flush eyes thoroughly with sterile eye wash solution. Seek medical attention if irritation persists.

Skin Contact: Wash skin with soap and water. Seek medical attention if irritation persists.

Inhalation: Remove to fresh air if breathing is difficult. Seek medical attention if difficulty persists.

Ingestion: Ingestion is considered to be an unlikely route of exposure. However, if ingestion occurs, seek medical attention.

5. FIRE FIGHTING MEASURES

OSHA: Class III B (Combustible)

Extinguishing Media: Carbon dioxide, dry chemical, or foam recommended. Apply water spray to cool exposed containers.

Fire Hazard: Fire or excessive heat may produce hazardous decomposition products.

Flammability Data: Flash Point: Greater than 215 degrees F. (Closed Cup Method, ASTM D3278-82)

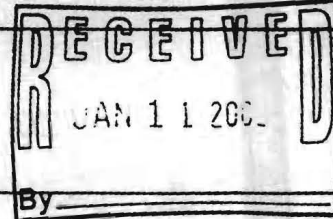
6. ACCIDENTAL RELEASE MEASURES

Clean up with absorbent material. Transfer to appropriate containers for disposal.

7. HANDLING AND STORAGE

Handling: Avoid contact with skin, eyes, or clothing. Wash hands after use.

Storage: Store in closed containers away from direct sources of heat.



8. EXPOSURE CONTROLS AND PERSONAL PROTECTION

Ventilation: The use of local exhaust is desirable.

Personal Protection: If prolonged contact is anticipated, use barrier skin cream.

Exposure Limits: There are no established OSHA permissible exposure limits (PEL) or American Conference of Government Industrial Hygienists (ACGIH) threshold limiting values (TLV) for this product.

9. PHYSICAL AND CHEMICAL PROPERTIES

Evaporation Rate: Slower than water Odor: Oily Solubility: Insoluble in water Boiling Range: Greater than 500 degrees F.

10. STABILITY AND REACTIVITY

General: This product is a stable mixture. Decomposition is not anticipated.

Incompatibility: This product is not compatible with water-based materials.

Hazardous Decomposition Products: Noxious gases may be evolved in a fire.

To comply with O.S.H.A. regulations
M.S.D.S. sheets must be kept on file
DO NOT THROW AWAY !!

FORM: OS-1

MATERIAL SAFETY DATA SHEET

In compliance with the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard as published in the Code of Federal Regulations 29 CFR 1910.1200.

PREPARED BY: RO

Page: 2

1. TOXICOLOGICAL INFORMATION

General: This product is a mixture of several ingredients. There are no established OSHA permissible exposure limits (PEL) or American Conference of Government Industrial Hygienists (ACGIH) threshold limiting values (TLV) for this product.

Medical Conditions Aggravated by Exposure: None known.

Acute (Short-term) Toxicity: No adverse effects known.

Chronic (Long-term) Toxicity: No adverse effects known.

Carcinogenicity: This product contains no reportable known or potential carcinogens listed by the National Toxicology Program (NTP) or the International Agency for Research on Cancer (IARC). Materials contained in this product are not OSHA regulated under 29 CFR 1910 Subpart Z.

2. DISPOSAL CONSIDERATIONS

General: This product should be disposed of in accordance with applicable federal, state, and local regulations.

Waste Management: This product is not considered a RCRA hazardous waste under 40 CFR 261, and is not regulated under CERCLA (Superfund).

3. TRANSPORTATION INFORMATION

United States:

O.T. Shipping (49 CFR 172.101-102).....: Not Regulated

O.T. Hazard Class (49 CFR 172.101-102)...: None

O.T. Label.....: None

O.T. Placard.....: None

Full Name of Lading Description.....: Printing Ink

International:

United Nations/World American Number.....: Not Regulated

International Maritime Dangerous Goods Classification: Not Regulated

International Air Transport Association Classification: Not Regulated

4. REGULATORY INFORMATION

Hazard Communication Standard Status: This product is not considered to be a hazardous substance under OSHA's Federal Hazard Communication Standard 29 CFR 1910.1200.

Toxic Substances Control Act (TSCA) Status: All ingredients are certified to be materials or mixtures listed on the U.S. TSCA Inventory.

Superfund Amendments and Reauthorization Act (SARA) Title III:

Section 302 Extremely Hazardous Substances (40 CFR 355).....: None

Section 311/312 OSHA Hazardous Chemicals.....: None

Section 313 Toxic Chemicals and Chemical Categories (40 CFR 372)...

Barium Compounds % by Weight: 0

Copper Compounds % by Weight: 0

Zinc Compounds % by Weight: 0

Resource Conservation and Recovery Act (RCRA):

This product contains no reportable hazardous substances (40 CFR 261.33) and does not exhibit the characteristics of hazardous waste (40 CFR 261.20-.24).

California Proposition 65 Regulated Substances:

This product does not contain any known concentrations of regulated substances.

REG Status:

This product is formulated to be in compliance with CONEG Model Legislation for Packaging and Packaging Ink Components.

All information and recommendations for this product are believed to be accurate. Since this product may be used under conditions not under our control, no warranty, expressed or implied, is made with respect to the use of this product. Kohl & Madden Printing Ink Company assumes no liability or responsibility for personal injury or property damage caused by the product. Users assume all risk associated with the use of this product.

ES



Pauline Singley
Human Resources Manager

1741 Route 7 South
Middlebury, VT 05753
802.388.7911 ext. 231
802.386.3654 fax
802.382.2231 voice mail
pauline.singley@standardregister.com

Recycled Paper, 10% Post-Consumer ♻️



George Wendel
Plant Manager
Document Management
and Systems Division

Route 7 South
Middlebury, VT 05753
802.388.7911
802.388.3124 fax

Recycled Paper, 10% Post-Consumer ♻️

FEB 14 2002

February 8, 2002

Chief of Hazardous Waste Program
Attn: John Miller
103 South Main Street
West Building
Waterbury, Vermont 05671-0404

RE: Standard Register's Disposal of Solid Waste

Dear Mr. Miller,

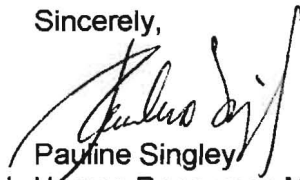
Thank you for your assistance and direction in regards to the processing of solid waste from our facility to the Addison County Solid Waste District.

As a follow-up to our conversation of February 4, 2002, we have taken the following steps:

- Researched the composition of the ink used by our facility. (See enclosed letter from our ink supplier)
- Sorted the waste left in the suspect compactor and found it to be free of hazardous waste.
- Sent the District copies of the MSDS for ink and a copy of the letter from the ink supplier. (See enclosed MSDS.)
- Received letter from Kathleen Johnson, ACSWD, indicating that the solid waste from our facility will be accepted as long it is free from hazardous materials and remains in compliance with all State and Federal hazardous waste regulations.

Again, thank you for your help in this matter. Please call me if you need more information on this matter.

Sincerely,



Pauline Singley
Human Resources Manager
Standard Register Company

Cc: George Wendel, Plant Manager, SRC

Encs (2)





February 7, 2002

Ms. Pauline Singley SPHR
Human Resources Manager
Standard Register Company
Route 7 South
Middlebury, VT 05753

Dear Ms. Singley:

This letter is in response to your request on the compliance of the Kohl & Madden inks supplied to your location in regard to 40CFR261.31 and the F list contained within this regulation.

The inks as supplied to Standard Register in Middlebury Vermont do not contain any of the materials on the referenced list.

Concerning the list of K&M products sold to your location, I was sent only the products sold over the last six months, July 2001 to January 2002. Please let me know if this would be sufficient or whether you require a total list for the year 2001. The list I have is quite extensive and would require sending by mail.

I trust this information will satisfy your requirements. If I can assist you further in this matter, please let me know.

Sincerely,

John Daugherty
Technical Director

Cc
Ken Allaby
Chris Boyd
Len DiLeo



MATERIAL SAFETY DATA SHEET

In compliance with the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard as published in the Code of Federal Regulations 29 CFR 1910.1200.

DATE: 1-8-02

PREPARED BY: RO

ATR88-768

Page: 1

MAGNASOY MAGNETIC BLACK

1. Batch #: FW 111841 Qty: 10# LBS
Date : 01/08/02
Hazard Rating: H-1, F-1, R-0, EMERGENCY # (770)-368-1234
Kohl & Madden, 6403 Warren Drive, Norcross GA 30093

WARNING: THIS PRODUCT CAN CAUSE EYE AND SKIN IRRITATION. SEE MATERIAL SAFETY DATA SHEET FOR DETAILED INFORMATION.
The merchandise herein contained is sold without warranties implied or expressed. Claims not exceeding purchase price may be allowed if presented within five days after receipt of goods. These conditions shall not be waived other than in writing.

2. HAZARDOUS INGREDIENTS

This product contains no reportable substances as defined under Occupational Safety & Health Administration's Health Communication Standard (29 CFR 1910.1200).

3. HAZARDS IDENTIFICATION

Emergency Overview: Product may cause skin and eye irritation.

PRODUCT HMIS RATINGS: H F R

0 0 0

HMIS Rating Definition: H = Health F = Flammability R = Reactivity
0 = Minimal, 1 = Slight, 2 = Moderate, 3 = Serious, 4 = Severe

4. FIRST AID MEASURES

Eye Contact: Flush eyes thoroughly with sterile eye wash solution. Seek medical attention if irritation persists.

Skin Contact: Wash skin with soap and water. Seek medical attention if irritation persists.

Inhalation: Remove to fresh air if breathing is difficult. Seek medical attention if difficulty persists.

Ingestion: Ingestion is considered to be an unlikely route of exposure. However, if ingestion occurs, seek medical attention.

5. FIRE FIGHTING MEASURES

OSHA: Class III B (Combustible)

Extinguishing Media: Carbon dioxide, dry chemical, or foam recommended. Apply water spray to cool exposed containers.

Fire Hazard: Fire or excessive heat may produce hazardous decomposition products.

Flammability Data: Flash Point: Greater than 215 degrees F. (Closed Cup Method, ASTM D3278-82)

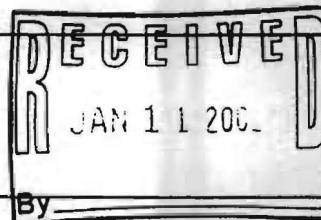
6. ACCIDENTAL RELEASE MEASURES

Clean up with absorbent material. Transfer to appropriate containers for disposal.

7. HANDLING AND STORAGE

Handling: Avoid contact with skin, eyes, or clothing. Wash hands after use.

Storage: Store in closed containers away from direct sources of heat.



8. EXPOSURE CONTROLS AND PERSONAL PROTECTION

Ventilation: The use of local exhaust is desirable.

Personal Protection: If prolonged contact is anticipated, use barrier skin cream.

Exposure Limits: There are no established OSHA permissible exposure limits (PEL) or American Conference of Government Industrial Hygienists (ACGIH) threshold limiting values (TLV) for this product.

9. PHYSICAL AND CHEMICAL PROPERTIES

Evaporation Rate: Slower than water Odor: Oily Solubility: Insoluble in water Boiling Range: Greater than 500 degrees F.

10. STABILITY AND REACTIVITY

General: This product is a stable mixture. Decomposition is not anticipated.

Incompatibility: This product is not compatible with water-based materials.

Hazardous Decomposition Products: Noxious gases may be evolved in a fire.

To comply with O.S.H.A. regulations
M.S.D.S. sheets must be kept on file
DO NOT THROW AWAY !!

FORM: OS-1

27

MATERIAL SAFETY DATA SHEET

In compliance with the Occupational Safety and Health Administration (OSHA)
Hazard Communication Standard as published in the Code of Federal Regulations
29 CFR 1910.1200.

PREPARED BY: RO

Page: 2

11. TOXICOLOGICAL INFORMATION

General: This product is a mixture of several ingredients. There are no established OSHA permissible exposure limits (PEL) or American Conference of Government Industrial Hygienists (ACGIH) threshold limiting values (TLV) for this product.

Medical Conditions Aggravated by Exposure: None known.

Acute (Short-term) Toxicity: No adverse effects known.

Chronic (Long-term) Toxicity: No adverse effects known.

Carcinogenicity: This product contains no reportable known or potential carcinogens listed by the National Toxicology Program (NTP) or the International Agency for Research on Cancer (IARC). Materials contained in this product are not OSHA regulated under 29 CFR 1910 Subpart Z.

12. DISPOSAL CONSIDERATIONS

General: This product should be disposed of in accordance with applicable federal, state, and local regulations

Waste Management: This product is not considered a RCRA hazardous waste under 40 CFR 261, and is not regulated under CERCLA (Superfund).

13. TRANSPORTATION INFORMATION

United States:

D.O.T. Shipping (49 CFR 172.101-102).....: Not Regulated
D.O.T. Hazard Class (49 CFR 172.101-102)...: None
D.O.T. Label.....: None
D.O.T. Placard.....: None
Bill of Lading Description.....: Printing Ink

International:

United Nations/North American Number.....: Not Regulated
International Maritime Dangerous Goods Classification: Not Regulated
International Air Transport Association Classification: Not Regulated

14. REGULATORY INFORMATION

OSHA Hazard Communication Standard Status: This product is not considered to be a hazardous substance under OSHA's Federal Hazard Communication Standard 29 CFR 1910.1200.

Toxic Substance Control Act (TSCA) Status: All ingredients are certified to be materials or mixtures listed on the U.S.TSCA Inventory.

Superfund Amendments and Reauthorization Act (SARA) Title III:

Section 302 Extremely Hazardous Substances (40 CFR 355).....: None
Section 311/312 OSHA Hazardous Chemicals.....: None
Section 313 Toxic Chemicals and Chemical Categories (40 CFR 372)...:

Barium Compounds % by Weight: 0
Copper Compounds % by Weight: 0
Zinc Compounds % by Weight: 0

Resource Conservation and Recovery Act (RCRA):

This product contains no reportable hazardous substances (40 CFR 261.33) and does not exhibit the characteristics of hazardous waste (40 CFR 261.20-.24).

California Proposition 65 Regulated Substances:

This product does not contain any known concentrations of regulated substances.

UNEG Status:

This product is formulated to be in compliance with CONEG Model Legislation for Packaging and Packaging Ink Components.

The information and recommendations for this product are believed to be accurate. Since this product may be used under conditions beyond our control, no warranty, expressed or implied, is made with respect to the use of this product. Kohl's Madden Printing Ink Corporation assumes no liability or responsibility for personal injury or property damage caused by the product. Users assume all risks associated with the use of this product.

FORM: OS-1

FS

Vermont Department of Environmental Conservation
Waste Management Division
Management and Prevention Section

PRE-INSPECTION CHECKLIST

SITE-SPECIFIC INFORMATION:

Inspection Date: 02/14/02

Site Name: STANDARD REGISTER INC

Address: Rt 7 South Middlebury

VT ID No: S - 01 - 11 - 030 EPA ID No: VT D 064 273 488

Contact Name(s): PAULINE SINGLEY FRED Schoolcraft

Last Inspection Date: 12.14.1995 CSE Last Inspector: GARY URICH
1.27.1995 CEI

Type of current inspection: initial follow-up

VIOLATIONS CITED WITHIN THE LAST THREE YEARS:

Action Date & Type Section Cited Details

1)

LAST INSPECTED CEI 1.29.95 = 7 YEARS AGO

2)

3)

4)

5)

6)

7)

Pre-Inspection Activities :

- get project file
- get list of facility's Manifested Generator Shipments
- start Pre-Inspection and appropriate checklists/forms
 - generator checklist
 - partial inspection checklist
 - LDR checklist
 - universal waste checklist
 - multi-media checklist (check PIN)
 - map(s)
 - reserve vehicle
- follow-up inspection checklist
- US EPA tank inspection checklist(s)
- used oil inspection checklist
- closing conference log
- Screening inspection checklist(s)
- copy of source description

Materials to take on the Inspection:

- business cards
- steel-toe and -shank boots
- eye protection
- hearing protection
- long-distance telephone card
- clipboard and note paper
- VT HWMR and SWMR
- Vermont generator handbook
- notification of regulated waste activity form & instructions
- VBSEX and Environmental Assistance Division handouts
- photo ID
- hard hat
- plastic gloves
- camera, extra film, batteries
- U.S. EPA RCRIS list
- pens, markers, post-its
- 40 CFR (Parts 260-299)
- CEG handbook
- Cell phone
- GPS equipment
- Computer

Post-Inspection Activities: (optional)

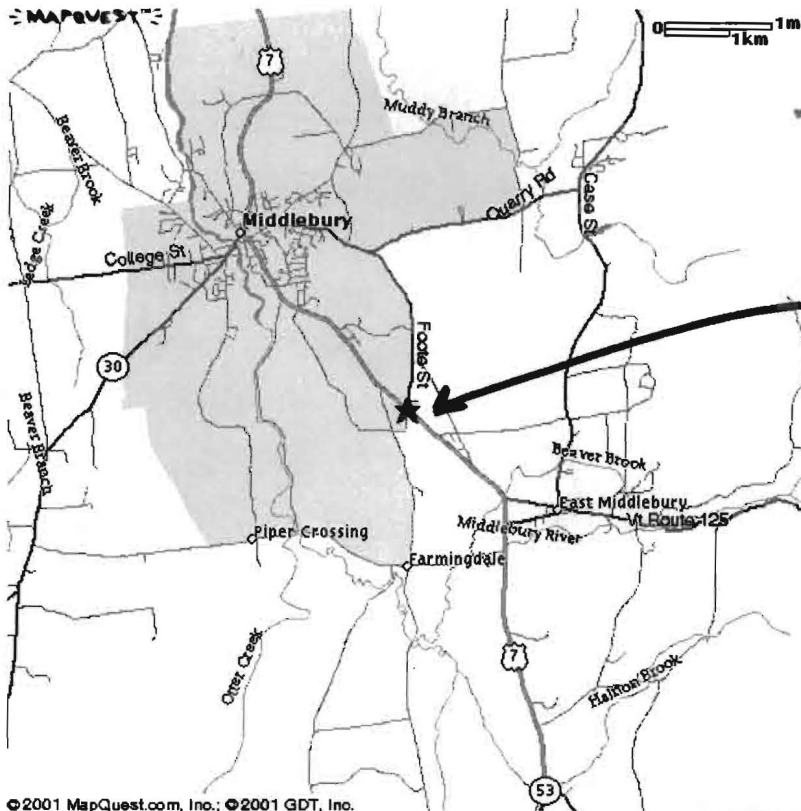
- Enter inspection in inspection log
- File Multimedia Inspection form (to EAD: Chris Thompson)
- Prepare trip report
- Prepare Inspection Outcome Document(s) (letter, NOAV, referrals)
- Prepare Enforcement Decision Document
- Reviews : peer supervisor legal
- Signature
- Make copies for: File Clip RCRIS Director
- File NOAV Entry sheet with Enforcement (to Becky Buchanan)
- Update RCRIS with informed form (do preliminary within 2 weeks of inspection)



1741 Route 7 S
Middlebury, VT
05753-8424, US

SEND TO PRINTER

Back



Standard Register

© 2001 MapQuest.com, Inc.; © 2001 GDT, Inc.
All rights reserved. Use Subject to License/Copyright



CNET.com ALL NEW Netscape 6.2

CNET.com says Netscape 6.2 is...

CNET.com ALL NEW Netscape 6.2

CNET.com says Netscape 6.2 is...

This map is informational only. No representation is made or warranty given as to its content. User assumes all risk of use. MapQuest and its suppliers assume no responsibility for any loss or delay resulting from such use.

Privacy Policy & Legal Notices
© 2002 MapQuest.com, Inc. All rights reserved.