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Rev. 07/10/02

J.L. CLARK
a member of the CLARCOR packaging products group

171352

March 12, 1990

United States Department of Justice
Drug Enforcement Administration
500 Dirksen Federal Building
219 S. Dearborn Street
Chicago, Illinois 60604

- Certified Mail -
P 945 779 225

Gentlemen:

In response to your request related to the Chemical Diversion Trafficking Act of 1988, enclosed is the completed survey form for J. L. Clark - Atlas Tube Division, 2300 Wisconsin Avenue, Downers Grove, Illinois 60515.

Please advise what additional requirements may apply to our facility under the law. We trust that this information satisfies your request. Should you require additional information, please let us know.

Sincerely,

James Klotz

James K. Klotz, CHMM
Chemist/Environmental Engineer

JKK:tkb

Enclosure

cc: Dean Dodson
Dick Anderson
Bill Pruyne
Greg Gann
Gordon VerWeyst

2300 Sixth Street, P.O. Box 7000
Rockford, Illinois 61125
815/962-8861
FAX: 815/962-6356

QUESTIONNAIRE

NAME: J. L. Clark-Atlas Tube Div. ADDRESS: 2300 Wisconsin Avenue

Downers Grove, IL 60515

According to information that DEA has obtained, you purchased one or more of the following precursor and essential chemicals in threshold or larger quantities (please indicate which):

PRECURSOR CHEMICALS		ESSENTIAL CHEMICALS	
Anthranilic Acid and its salts.	____	Acetic Anhydride	____
Benzyl Cyanide	____	Acetone	x
Ephedrine, its salt, optical isomers, and their salts	____	Benzyl Chloride	____
Ergonovine and its salts	____	Etyl Ether	____
Ergotamine and its salts	____	Hydriodic Acid	____
N-Acetylanthranilic Acid and its salts	____	Potassium Permanganate	____
Norpseudoephedrine, its salts, optical isomers and their salts	____	2-Butanone (or Methyl Ethyl Ketone or MEK)	x
Phenylacetic Acid and its salts optical isomers, and their salts	____	Toluene	x
Phenylpropanolamine, its salts, optical isomers, and their salts	____		
Piperidine and its salts	____		
Psuedoephedrine, its salts, optical isomers and their salts	____		
3,4-Methylenedioxyphenyl-2 propanone (piperonyl methylketone)	____		

Briefly describe your uses of these chemicals:

Components and thinners for roll coatings and spray lacquer and wash-up solutions.

If you use these chemicals in a manufacturing process do you salvage any of the chemical for future sale or redistribution? Yes ___ No x*

*Waste material is reclaimed at an off-site facility for redistribution by Avganic Industries.

Do you redistribute any of these chemicals in any manner? (Not including as a component of an end product mixture) Yes ___ No x

If yes, please explain: _____

Please provide the name, title and telephone number of a contact person:

NAME AND TITLE:	Dean Dodson, Director Employee Relations	James Klotz, Chemist/Environmental Eng.
TELEPHONE NUMBER:	708-969-6100	815-962-8861

Thank you for your cooperation in this matter.

r/4

J.L.CLARK
a member of the CLARCOR consumer products group

Date: February 19, 1991

To: Dick Anderson

By: Jim Klotz

Copies To: Al Moore/Greg Gann
Gordon VerWeyst

Reference: J. L. Clark - Atlas Division

Subject: Lead Pot Bricks

F162

Attached is a copy of the permit for disposal for the lead pot bricks from IEPA.

Peoria Disposal will now complete its review and paperwork to complete acceptance at their site. We expect final pricing and shipping details by February 22nd. Once this is received, we should be able to complete the disposal by March 8th. We will advise as soon as we have further details.

/tkb

Attach.

Spoke w/ Sam Erwin -

- $210.00/yd + transportation.
- dump truck
- give early morning date

Illinois Environmental Protection Agency • P.O. Box 19276, Springfield, IL 62794-9276

RECEIVED

FEB 8 1991

217/782-6762

FEBRUARY 04, 1991 WASTE STREAM NUMBER 910054
APPLICATION RECEIVED: 01/14/91 PERMIT EXPIRES: 02/01/96
PERMIT NUMBER 910054-1438120003
PERMIT ISSUED TO:

PEORIA DISPOSAL CO
4700 N STERLING
P.O. BOX 9071
PEORIA , IL
61614

PEORIA DISPOSAL CO
4700 N STERLING
P.O. BOX 9071
PEORIA , IL
61614

WASTE NAME: BRICK WITH LEAD
WASTE CLASS 40 HAZARDOUS SUBJECT TO FEE

USEPA HAZARDOUS WASTE NUMBERS:
D008

PERMIT TO RECEIVE THE INDICATED WASTE IS GRANTED.

SITE NAME: PEORIA DISPOSAL CO #1 IEPA SITE NO.: 1438120003

DISPOSITION OF WASTE: 26
BULK OR CONTAINERIZED IN AREA SEPARATE FROM REFUSE

WASTE TREATMENT:

STORAGE:

ATTENTION: JIM KLOTZ IEPA GENERATOR NO.: 0438030002
WASTE GENERATOR: J L CLARK
2300 WISCONSIN AVE
DOWNERS GROVE IL
60515

THIS PERMIT IS GRANTED SUBJECT TO THE ATTACHED STANDARD CONDITIONS AND ANY SPECIAL CONDITIONS LISTED BELOW.

1. PURSUANT TO SECTION 39(H) OF THE ILLINOIS ENVIRONMENTAL PROTECTION ACT, AUTHORIZATION IS GRANTED FOR LAND DISPOSAL OF THIS WASTE. THIS AUTHORIZATION IS SUBJECT TO ANY CONDITIONS CONTAINED HEREIN.

2. AFTER RECEIPT AT THIS SITE, BUT PRIOR TO DISPOSAL, EVERY CONTAINER MUST BE SAMPLED AND ANALYZED BY THE PAINT FILTER TEST DESCRIBED IN 35 IAC, SECTION 729.320. NO WASTES THAT YIELD FLUID MAY BE DISPOSED.

3. THIS PERMIT DOES NOT AUTHORIZE DISPOSAL OF THIS WASTE STREAM IN VIOLATION OF ANY STATE OR FEDERAL LAWS OR REGULATIONS.

Illinois Environmental Protection Agency • P.O. Box 19276, Springfield, IL 62794-9276

FEBRUARY 04, 1991
APPLICATION RECEIVED: 01/14/91
PERMIT NUMBER 910054-1438120003

WASTE STREAM NUMBER 910054
PERMIT EXPIRES: 02/01/95

LWE:MAS
CC:J L CLARK
REGION: PEORIA

LAWRENCE W. EASTEP, P.E.
MANAGER, PERMIT SECTION
DIVISION OF LAND POLLUTION CONTROL

Standard Conditions

The Illinois Environmental Protection Act (Illinois Revised Statutes, Chapter 111-1/2, Section 1039) grants the Environmental Protection Agency authority to impose conditions on permits which it issues.

1. There shall be no deviations from the approved specifications unless a written request for modification of the permit is submitted to the Agency and approved.

2. Waste described in this permit must be accompanied by a manifest when transported except where exempt.

3. This permit is issued subject to all other regulations applicable to the permittee herein.

4. Hazardous waste, upon disposal, is subject to a fee in an amount as specified in the Environmental Protection Act. If the permittee is disposing of hazardous waste, he shall comply with Ill. Rev. Stat., 1980, Sec. 1022.2(b), as amended from time to time, and with the procedures adopted by the Agency in furtherance of such statutory provision and as set forth in a document entitled "Procedures for Operation of a Hazardous Waste Disposal Fee System," as published in 4 Illinois Register 774 (September 12, 1980).

5. The permittee shall allow any agent duly authorized by the Agency upon presentation of credentials:

   a. to enter at reasonable times, the permittee's premises where actual or potential effluent, emission or noise sources are located or where any activity is to be conducted pursuant to this permit.

   b. to have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit.

   c. to inspect at reasonable times, including during any hours of operation of equipment constructed or operated under this permit, such equipment or monitoring methodology or equipment required to be kept, used, operated, calibrated and maintained under this permit.

   d. to obtain and remove at reasonable times samples of any discharge or emission of pollutants.

   e. to enter at reasonable times and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring, or recording any activity, discharge, or emission authorized by this permit.

   f. to enter or inspect at reasonable times, the permittee's premises for any other lawful purpose under the Environmental Protection Act.

6. Standard Condition No. 5 shall not constitute a waiver of any constitutional right of the permittee.

7. These standard conditions shall prevail unless modified by special conditions.

8. This Agency reserves the right to require installation of additional monitoring devices, to alter the selection of parameters to be analyzed and to alter monitoring frequencies as may be necessary to fulfill the intent of the Environmental Protection Act.

9. This permit may be modified or revised to make the permit compatible with applicable Amendments to the Illinois Environmental Protection Act, new or amended Illinois Pollution Control Board Rules and Regulations, Regulations promulgated by the United States Environmental Protection Agency pursuant to the Resource Conservation and Recovery Act of 1976, as amended (RCRA) or Amendments to RCRA. Such modification or revision shall become part of this permit on the effective date of the Rule, Regulation or Amendment. The Agency will notify the permittee of such modification or revision.

   This standard condition shall not prejudice the permittee's right to obtain or be granted a reasonable time in which to comply, but in no event shall such time be later than any applicable Federal or State of Illinois statutory or regulatory compliance date, in connection with any modification or revision made pursuant thereto.

10. In accordance with Rule 302(A) of Illinois Pollution Control Board Rules and Regulations, Chapter 9: Special Waste Hauling Regulations (Chapter 9), the permittee shall not accept the special waste described herein for treatment, storage or disposal from any person unless that person has a valid special waste hauling permit issued by the Agency under Part II of Chapter 9, and concurrently presents to the permittee, or his agent, a completed, signed manifest as required by Part V of Chapter 9, which designates the permittee's facility as the destination for the special waste.

Illinois Environmental Protection Agency • P.O. Box 19276, Springfield, IL 62794-9276

RECEIVED

FEB 8 1991

217/782-6762

FEBRUARY 04, 1991 WASTE STREAM NUMBER 910054
APPLICATION RECEIVED: 01/14/91 PERMIT EXPIRES: 02/01/96
PERMIT NUMBER 910054-1438120003
PERMIT ISSUED TO:

PEORIA DISPOSAL CO
4700 N STERLING
P.O. BOX 9071
PEORIA IL
61614

PEORIA DISPOSAL CO
4700 N STERLING
P.O. BOX 9071
PEORIA
[illegible]

WASTE NAME: BRICK WITH LEAD [illegible] HAZARDOUS WASTE NUMBERS:
WASTE CLASS 40 HAZARDOUS SUBJECT TO FBE D008

PERMIT TO RECEIVE THE INDICATED WASTE IS GRANTED.

SITE NAME: PEORIA DISPOSAL CO #1 IEPA SITE NO.: 1438120003

DISPOSITION OF WASTE: 26
BULK OR CONTAINERIZED IN AREA SEPARATE FROM REFUSE

WASTE TREATMENT:

STORAGE:

ATTENTION: JIM KLUTZ IEPA GENERATOR NO.: 0438030002
WASTE GENERATOR: J L CLARK
2300 WISCONSIN AVE
DOWNERS GROVE IL
60515

THIS PERMIT IS GRANTED SUBJECT TO THE ATTACHED STANDARD CONDITIONS AND ANY SPECIAL CONDITIONS LISTED BELOW.

1. PURSUANT TO SECTION 39(h) OF THE ILLINOIS ENVIRONMENTAL PROTECTION ACT, AUTHORIZATION IS GRANTED FOR LAND DISPOSAL OF THIS WASTE. THIS AUTHORIZATION IS SUBJECT TO ANY CONDITIONS CONTAINED HEREIN.

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3. THIS PERMIT DOES NOT AUTHORIZE DISPOSAL OF THIS WASTE STREAM IN VIOLATION OF ANY STATE OR FEDERAL LAWS OR REGULATIONS.

Illinois Environmental Protection Agency · P.O. Box 19276, Springfield, IL 62794-9276

GENERATOR'S MANIFEST REQUEST FORM

Dear Generator,

To obtain Illinois Uniform Hazardous Waste Manifests which are required for all Special Waste shipments coming into Illinois, within Illinois, and from Illinois to states not providing their own manifests, complete the below information. The cost is $1.00 per manifest, up to $250.00 (unless ordering pin-fed), and must be paid by check, cashier's check, or money order made payable to Treasurer, State of Illinois. Any questions should be directed to 217/524-4337 or 217/524/6175. Allow 3 weeks for processing. ABSOLUTELY NO PHONE ORDERS ACCEPTED. FEE MUST ACCOMPANY EACH MANIFEST ORDER. FAILURE TO COMPLETE THIS FORM ACCURATELY AND COMPLETELY WILL RESULT IN REJECTION OF THE MANIFEST REQUEST, AND POSSIBLE FORFEITURE OF THE MANIFEST FEE.

Generator Name _____

Generator Phone _ _ _/_ _ _-_ _ _ _ Contact _____

IL Generator # (not Federal) _ _ _ _ _ _ _ _ _ _ _ _
(Item B on the manifest)

Generator Location _____

_____
(City) (State) (Zip)

Waste stream authorization # _ _ _ _ _ _ (for waste destined for Illinois).
(Item I on the manifest)

Receiving facility IEPA # _ _ _ _ _ _ _ _ _ _ _ _
(Item G on the manifest)

GENERATOR NUMBERS ARE ISSUED TO A SPECIFIC FACILITY LOCATION. IF YOU MOVE, PLEASE NOTIFY US IN WRITING AT THE ADDRESS BELOW SO A NEW GENERATOR NUMBER CAN BE ISSUED.

MANIFESTS WILL BE ISSUED TO THE GENERATOR NUMBER IDENTIFIED ON THIS FORM. RECORDS ARE KEPT OF THE SPECIFIC MANIFEST NUMBERS ISSUED TO EACH GENERATOR AND THE MANIFESTS MUST BE USED ONLY BY THE GENERATOR IDENTIFIED ON THIS FORM.

Number of manifests requested: _____ @ $1.00 each = _____

Check # _____ For $ _____.00 enclosed.

If this manifest order is "Fee Exempt" ($250.00 already paid for calendar year 1990). please check here _____.

Pin-fed manifests are $1.00 each, no maximum. Check box ☐ if you wish pin-fed.

If the box above is not checked and money not received for orders over $250.00, you will be sent regular, non-pin-fed manifests.

FROM: STATE OF ILLINOIS
Environmental Protection Agency
2200 Churchill Road
P.O. Box 19276
Springfield, IL 62794-9276

IST OFFICE BOX) TO WHICH

* * * * * * * * * * * * * *

ised Statutes, 1987, as
ation is required.
ditional civil penalty up
and imprisonment up to one

* MANIFEST REQUEST ENCLOSED *
Illinois Environmental Protection Agency
Division of Land Pollution Control #24
2200 Churchill Road
P.O. Box 19276
Springfield, Illinois 62794-9276

Standard Conditions

The Illinois Environmental Protection Act (Illinois Revised Statutes, Chapter 111-1/2, Section 1039) grants the Environmental Protection Agency authority to impose conditions on permits which it issues.

1. There shall be no deviations from the approved specifications unless a written request for modification of the permit is submitted to the Agency and approved.

2. Waste described in this permit must be accompanied by a manifest when transported except where exempt.

3. This permit is issued subject to all other regulations applicable to the permittee herein.

4. Hazardous waste, upon disposal, is subject to a fee in an amount as specified in the Environmental Protection Act. If the permittee is disposing of hazardous waste, he shall comply with Ill. Rev. Stat., 1980, Sec. 1022.2(b), as amended from time to time, and with the procedures adopted by the Agency in furtherance of such statutory provision and as set forth in a document entitled "Procedures for Operation of a Hazardous Waste Disposal Fee System," as published in 4 Illinois Register 774 (September 12, 1980).

5. The permittee shall allow any agent duly authorized by the Agency upon presentation of credentials:

   a. to enter at reasonable times, the permittee's premises where actual or potential effluent, emission or noise sources are located or where any activity is to be conducted pursuant to this permit.

   b. to have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit.

   c. to inspect at reasonable times, including during any hours of operation of equipment constructed or operated under this permit, such equipment or monitoring methodology or equipment required to be kept, used, operated, calibrated and maintained under this permit.

   d. to obtain and remove at reasonable times samples of any discharge or emission of pollutants.

   e. to enter at reasonable times and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring, or recording any activity, discharge, or emission authorized by this permit.

   f. to enter or inspect at reasonable times, the permittee's premises for any other lawful purpose under the Environmental Protection Act.

6. Standard Condition No. 5 shall not constitute a waiver of any constitutional right of the permittee.

7. These standard conditions shall prevail unless modified by special conditions.

8. This Agency reserves the right to require installation of additional monitoring devices, to alter the selection of parameters to be analyzed and to alter monitoring frequencies as may be necessary to fulfill the intent of the Environmental Protection Act.

9. This permit may be modified or revised to make the permit compatible with applicable Amendments to the Illinois Environmental Protection Act, new or amended Illinois Pollution Control Board Rules and Regulations, Regulations promulgated by the United States Environmental Protection Agency pursuant to the Resource Conservation and Recovery Act of 1976, as amended (RCRA) or Amendments to RCRA. Such modification or revision shall become part of this permit on the effective date of the Rule, Regulation or Amendment. The Agency will notify the permittee of such modification or revision.

   This standard condition shall not prejudice the permittee's right to obtain or be granted a reasonable time in which to comply, but in no event shall such time be later than any applicable Federal or State of Illinois statutory or regulatory compliance date, in connection with any modification or revision made pursuant thereto.

10. In accordance with Rule 302(A) of Illinois Pollution Control Board Rules and Regulations, Chapter 9: Special Waste Hauling Regulations (Chapter 9), the permittee shall not accept the special waste described herein for treatment, storage or disposal from any person unless that person has a valid special waste hauling permit issued by the Agency under Part II of Chapter 9, and concurrently presents to the permittee, or his agent, a completed, signed manifest as required by Part V of Chapter 9, which designates the permittee's facility as the destination for the special waste.

J.L. CLARK
a member of the CLARCOR consumer products group

December 12, 1990

Mr. Sam Erwin
Environmental Waste Services, Inc.
1641 Kensington Place
Aurora, IL 60506

Dear Sam:

Enclosed please find the completed authorization for our lead contaminated bricks. Also, we signed the pesticide/herbicide form.

Please note that we corrected the Illinois Generator ID Number. We apparently missed this on the original Waste Management permit form. Hope this does not create too much of a problem.

Should you have any questions, please let me know.

Sincerely,

James K. Klotz, CHMM
Chemist/Environmental Engineer

/tkb

Enclosure

2300 Sixth Street, P.O. Box 7000
Rockford, Illinois 61125
815/962-8861
FAX: 815/962-6356

Application Form

Request for Authorization to Deposit Hazardous Waste (Sec. 39(h) of the Act) - LPC-PA10

Generator Name: J.L. Clark

Generator Address: 2300 Wisconsin Ave

City: Downers Grove State: IL Zip: 60515

Generator RCRA ID No.: ILD005130000 SIC Code: 3499

Illinois Generator Code: 0438000002

Contact Person: Jim Klotz Phone No.: 815-961-6356

Waste Name: Brick w/ Lead

All Hazardous Waste Numbers: D008

1. Is this for a one time non-recurring disposal of waste (i.e. from a cleanup)? Yes X No ___
   - If yes provide the estimated volume 10 cubic yards
2. Is this application for an ongoing or recurring waste stream? Yes ___ No X
   - If yes provide the rate of waste generation/disposal ___
3. Does this waste result from cleanup of a spill (attach explanation)? Yes ___ No X
4. Does the waste result from the closure of a hazardous waste facility? (If yes, identify the date of closure plan approval and nature of closure.) Yes ___ No X
5. Does this waste result from the clean-up of a CERCLA SITE? (If yes include a copy of the Record of Decision.) Yes ___ No X

6. Does this waste result from some other type of cleanup? (Attach explanation) Yes ___ No X

7. Is this waste permitted or authorized (or is application presently being made) to go to any other solid waste management facilities? (If yes, identify facilities, and appropriate permit number.) Yes ___ No X

8. If this waste is a pollution control residual, subject to other permitting requirements please indicate the type of requirement, appropriate permit or authorization number, and issuing agency: Yes ___ No X

Air Pollution Control:

Water Pollution Control - NPDES:

Water Pollution Control - Pretreatment:

Land Pollution Control:

Other:

(Attach additional pages as necessary)

V. Certification and signature by authorized representative of generator

Certification: I certify 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.

Signature: Jan K. Kotz Date: 12/11/90

Title: Chemist/Environmental Engineer

INSTRUCTIONS

Request for Authorization to Deposit Hazardous Waste (Sec. 39(h) of the Act)

Section 39(h) of the Environmental Protection Act provides that hazardous waste may not be deposited in a permitted hazardous waste site, unless specific authorization is received from the Agency. The Agency may "authorize" land disposal only after the "generator" has indicated that he has considered technological feasibility and economical reasonableness and demonstrated that his waste cannot be:

1. Recycled for reuse; or
2. Incinerated; or
3. Chemically, physically or biologically treated so as to neutralize and render the waste non-hazardous.

The Agency has determined that persons disposing of wastes at landfills, land treatment facilities, surface impoundments, underground injection wells and waste piles are subject to Section 39(h) of the Act. In order to obtain authorization the generator must comply with the following:

1. The "Request for Authorization" form must be filled out, and appropriate responses attached;

2. The generator, or his authorized representative must certify and sign the form;

3. For generators shipping waste off-site to commercial facilities, the form must accompany a supplemental special waste stream application form and the waste must be analyzed for the E.P. Toxicity parameters and any other parameters necessary to demonstrate compliance with State or Federal Land Disposal restrictions.

4. All questions on the application should be fully responded to, however if something does not apply, then the generator must state why that question is not being responded to;

5. For persons utilizing surface impoundments for storage a closure plan showing removal of all waste, and contaminated soil must be submitted - in addition to the authorization application;

6. Persons utilizing surface impoundments for treatment and/or disposal - in addition to the authorization application - must demonstrate why the waste cannot be treated or disposed of in some other manner;

7. Persons with land treatment facilities should provide a land treatment demonstration plan (or reference to Part B if applicable) and an up-to-date closure plan.

8. If it is technically feasible to recycle, reuse, treat or incinerate a waste then the applicant must prove it is economically unreasonable to do so. The fact that disposal is cheaper is not an acceptable response. The generator must provide comparative costs of disposal and other alternatives, and why those alternatives are unreasonable. Since the Agency makes every effort to manage cleanup wastes on-site for which the Agency is responsible we expect the same from generators. Thus, for example, a generator might be expected to spend several times the cost of disposal to manage waste on-site.

   When attempting to prove economic unreasonableness, specific, detailed, cost estimates must be provided from at least two-sources. Unsubstantiated estimates will not be accepted. For example, for on-site cleanup, costs might be provided for set-up, trial burn, waste incineration (per yard), and dismantling. All costs should be considered.

   Once valid data is obtained, generators must make an argument as to why they think the costs are unreasonable.

9. Generators of waste should be aware that treatment in on-site accumulation tanks is exempt from RCRA permitting.

   Treatment and containment taken during immediate response to certain situations (i.e. a threat of a discharge of hazardous waste) is exempt from RCRA permitting (see 35 IAC 703.124 or 40 CFR 270.1(c)(3)).

   Treatment (or incineration) of contaminated soil to non-detectable levels (below the practical quantitation limit) of hazardous constituents may render the soil non-hazardous.

Please attach a full and complete response to each of the following. The burden of proof is on the generator to demonstrate that he cannot recycle, incinerate, or treat his waste. Thus, the Agency is not requiring that any specific steps be taken (e.g. process changes to recycle the waste) but if certain measures have been or will be taken then they must be identified to the Agency if the generator is to get credit for them. All wastes must be evaluated to see if they can be reused, recycled, treatment, incinerated. The generator should consider technological feasibility and economical reasonbleness in completing responses. (NOTE: failure to fully discuss all of the following may result in denial of this application):

I. Why can this waste not be recycled for reuse? Please respond to the following items:

1. Describe any steps taken or to be taken to internally reuse waste streams such as rinses, cleaning solvents, etc.

2. Describe the measures taken to reduce the hazardous waste generated through improved housekeeping.

3. Describe any changes made to the process to reduce the hazardous waste generated through the use of different raw or intermediate materials.

4. Describe any measures taken to reduce the hazardous waste generated by separating waste streams into components - either characteristic from listed, or hazardous from non-hazardous.

5. What equipment or other process changes have been or can be made to reduce or recycle hazardous waste.

6. Describe any other measures, such as contacting the Industrial Materials Exchange Service (IMES), that have been taken.

(NOTE: Even though a 100% recycling or reuse of waste cannot be achieved, a significant effort which nonetheless achieves less could be found to be reasonable.)

II. Why can this waste not be incinerated?

NOTE: At a minimum ignitable wastes should be incinerated unless there are extenuating circumstances.

III. Why can this waste not be chemically, physically, or biologically treated so as to neutralize the hazardous waste and render it non-hazardous?

NOTE: Characteristically hazardous wastes should be treated if possible to nonhazardous status. (In reviewing applications the Agency will check that the wastes haven't been mixed with other "listed" wastes.) "Listed" wastes, cannot be treated to nonhazardous status without being delisted. However, in many cases they are listed for only heavy metals and if they can be provided reasonable treatment so that they are no longer characteristically hazardous they may be amenable to continued disposal. Commercial treatment facilities do exist which have delistings for their treatment residuals. For example, in Illinois, there exists a facility which can treat F006, F007, F008, F009, F011, F012, F019, K062, and K002 through K008 wastes. Organics which might be present will be dealt with on a case-by-case basis. In wastes where hexavalent chrome is present the generator should utilize if possible, treatment processes which reduce hexavalent to trivalent chrome. If the waste is a wastewater treatment sludge the generator should consider dewatering (i.e. through filter presses, vacuum filters, centrifuges, etc.). If the waste is listed for cyanide, it should be treated, if possible, to reduce cyanide.

LMC:sf/sp/1568r,1-4

IEPA SUPPLEMENTAL PERMIT APPLICATIONS

PESTICIDE/HERBICIDE CERTIFICATION

GENERATOR'S NAME: J. L. Clark

GENERATOR'S ADDRESS: 2300 Wisconsin Ave.

Downers Grove, IL 60515

GENERATOR'S IEPA NO. 0438000002

WASTE NAME: Brick with lead

PERMIT # OR WASTE MATERIAL DATA SHEET #: 07990

The Illinois E.P.A. supplemental permit application procedures require the generator to provide justification as to why certain parameters are not analyzed. Therefore, if you do not have your sample analyzed for the listed pesticides/herbicides, F001-5 listed solvents, PCB's or dioxins, please complete the following certification.

Please circle any of the components listed below if you have a suspicion they may be contained in your waste.

ENDRIN	PCB's	METHOXYCHLOR
DIOXINS	LINDANE	F001 through F005 LISTED
TOXAPHENE	2,4,5, TP SILVEX	SOLVENTS
CHLORDANE	2,4-D	HEPTACHLOR + ~~ITS~~ EPOXIDE

If any of the pesticides and/or herbicides were circled, a TCLP (Toxic Characteristic Leachate Procedure) and Total analysis is required for the above compounds on a representative sample.

Also, if the extractable, organic halogen (EOX) level indicates a concentration of greater than 50 ppm, pertinent information or supporting documents concerning the process that could help explain the source of the EOX (i.e., an MSDS indicating the presence of a halogenated organic), should be provided.

If none were circled, the following statement is required.

I hereby certify that to the best of my knowledge, no RCRA pesticides/herbicides, or F001-5 listed wastes, PCB's, or dioxins were used in the production of, or are contained, in the waste.

Jim K. Klotz

AUTHORIZED SIGNATURE

Jim K. Klotz

PRINTED NAME

Chemist/Environmental Engineer

TITLE

12/11/80

DATE

J.L. CLARK
a member of the CLARCOR consumer products group

November 5, 1990

Mr. Sam Erwin
Environmental Waste Services, Inc.
1641 Kensington Place
Aurora, Illinois 60506

Dear Sam:

Enclosed please find the completed waste profile form and Pesticide/Herbicide letter for the firebrick at our Atlas Tube Division. Please note that we did change the profile sheet number on the pesticide letter to match the number on the waste profile form.

Please advise when the waste stream has been permitted as well as final pricing for transportation and disposal. Should you need any additional information, please let me know.

Sincerely,

James K. Klotz, CHMM
Chemist/Environmental Engineer

/tkb

Enclosure

Called 11/29 left message

2300 Sixth Street, P.O. Box 7000
Rockford, Illinois 61125
815/962-8861
FAX: 815/962-6356

PESTICIDE/HERBICIDE
Declaration Letter

Dear Customer:

This declaration letter provides us with information to make a determination on the analytical parameters to be run on your waste stream. If, to the best of your knowledge, that your waste stream may contain any of these parameters as listed below please make a notation on this form. If, to the best of your knowledge, your waste stream does not contain these parameters as listed below, please read and sign this form.

By signing this document, J. L. Clark hereby certifies that
(Generator's Name)

that the waste stream as described on Waste Management Generator's Waste Material Profile Sheet # 07990 **does not** contain the following pesticides and herbicides: Endrin, Lindane, Methoxychlor, Toxaphene, 2, 4-D, 2, 4, 5-TP (Silvex), Chlordane and Heptachlor (and its hydroxide) unless clearly noted.

X [signature]
Generator's Signature

X Chemist / Environmental Engineer
Title

X 11-2-90
Date

Peoria Disposal Company
4700 N. Sterling Avenue • Peoria, IL 61615 (309) 688-0760

07990

GENERAL INFORMATION

BILL TO: Environmental Waste Services, Inc.	GENERATOR NAME: J. L. Clark
ADDRESS: 1641 Kensington Place	FACILITY ADDRESS: 2300 Wisconsin Avenue
Aurora, IL 60506	CITY, STATE, ZIP: Downers Grove, IL 60515
CITY, STATE, ZIP: Contact: Sam Erwin	CONTACT: Jim Klotz — PHONE: 815-961-635

PROCESS INFORMATION

WASTE NAME	USEPA#	IEPA#	SIC CODE
Brick with lead	ILD005130000	0311740002	3499

PROCESS DESCRIPTION: Contaminated brick from melting operation

ANNUAL VOLUME: 10 Cubic Yards — ☒ BOX ☐ DRUMS ☐ TANK

ANALYTICAL/PHYSICAL DATA

PH	DENSITY	FLASH POINT	% TOTAL SOLIDS	PAINT FILTER	LOAD BEARING CAPACITY
7.1	3-4000 LB/YD³	> 200 °F	99.99	pass pass/fail	Not tested TON
TOTAL CYANIDE	**REACTIVE CYANIDE**	**TOTAL SULFIDE**	**REACTIVE SULFIDE**	**TOTAL PHENOL**	**TOTAL CHLORINE**
0.93 mg/kg	< 0.93 mg/kg	< 0.4 mg/kg	< 0.4 mg/kg	0.37 mg/kg	Not tested
REID VAPOR PRESSURE	**B S & W**	**T.O.C.**	**E.O.X.**	**ADDITIONAL**	
Not tested	Not tested	Not tested PPM	23 PPM		

ORGANICS

	TOTAL	E. P. TOXICITY		TOTAL	E. P. TOXICITY
ARSENIC (As)	20.5	1.10	ENDRIN	None suspected	
BARIUM (Ba)	17.2		LINDANE	NS	
CADMIUM (Cd)	< 0.002		METHOXYCHLOR	NS	
CHROMIUM (Cr)	5.51	0.004	TOXAPHENE	NS	
LEAD (Pb)	10388	7766	2, 4D	NS	
MERCURY (Hg)	< 0.0088		2, 4, 5 SILVEX	NS	
SELENIUM (Se)	0.351				
SILVER (Ag)					

IS THIS A HAZARDOUS WASTE AS DEFINED IN 40 CFR 261? ☒ YES ☐ NO — IF YES, INDICATE E.P.A. HAZARDOUS WASTE #: D008

IS THIS A POLLUTION CONTROL WASTE AS DEFINED IN 35 IL. ADM. CODE 858? ☐ YES ☒ NO

COMPOSITION (must Total 100%)

COMPONENT NAME	%	COMPONENT NAME	%
Brick	98-99		
Lead	.5-1		

TRANSPORTATION/D.O.T. INFORMATION

HAZARDOUS MATERIAL DESCRIPTION (SEE 49 CFR 172.101): RQ Hazardous Waste, Solid, N.O.S.

HAZARD CLASS: ORM-E — UN/NA#: NA9189(D008)

IN PLANT DIRECTIONS:

THE UNDERSIGNED HEREBY STATES THAT HE/SHE IS AUTHORIZED TO SIGN THIS DOCUMENT ON BEHALF OF THE GENERATOR, AND THAT TO THE BEST OF HIS/HER KNOWLEDGE THE INFORMATION SET FORTH ABOVE IS TRUE AND CORRECT.

X Jim K. Klotz Jamo K. Klotz — NAME OF AUTHORIZED REPRESENTATIVE
X Jim K. Klotz — SIGNATURE
X 11/2/90 — DATE

FOR PEORIA DISPOSAL COMPANY USE ONLY

RGN#	PERMIT#	AUTHORIZATION	METH: FAC	I.D.#	EXPIRATION

SPECIAL CONDITIONS:

DRIVE TIME (ONE WAY)	IN PLANT TIME	APPROVED BY	DATE

Peoria Disposal Company

4700 N. Starling Avenue • Peoria, IL 61615 (309) 688-0760

07990

GENERAL INFORMATION

BILL TO	GENERATOR NAME
Environmental Waste Services, Inc.	J. L. Clark
ADDRESS: 1641 Kensington Place	FACILITY ADDRESS: 2300 Wisconsin Avenue
Aurora, IL 60506	CITY, STATE, ZIP: Downers Grove, IL 60515
CITY, STATE, ZIP: Contact: Sam Erwin	CONTACT: Jim Klotz — PHONE: 815-961-635(

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7.1	3-4000 LB/YD³	> 200 °F	99.99	pass pass/fail	Not tested TON/F

TOTAL CYANIDE	REACTIVE CYANIDE	TOTAL SULFIDE	REACTIVE SULFIDE	TOTAL PHENOL	TOTAL CHLORINE
0.93 mg/kg	< 0.93 mg/kg	< 0.4 mg/kg	< 0.4 mg/kg	0.37 mg/kg	Not tested pp

REID VAPOR PRESSURE	B S & W	T.O.C.	E.O.X.	ADDITIONAL
Not tested	Not tested	Not tested PPM	23 PPM	

ORGANICS

	TOTAL	E. P. TOXICITY		TOTAL	E. P. TOXICITY
ARSENIC (As)	20.5	1.10	ENDRIN	None suspected	
BARIUM (Ba)	17.2		LINDANE	NS	
CADMIUM (Cd)	< 0.002		METHOXYCHLOR	NS	
CHROMIUM (Cr)	5.51	0.004	TOXAPHENE	NS	
LEAD (Pb)	10388	7766	2, 4D	NS	
MERCURY (Hg)	< 0.0088		2, 4, 5 SILVEX	NS	
SELENIUM (Se)	0.351				
SILVER (Ag)					

IS THIS A HAZARDOUS WASTE AS DEFINED IN 40 CFR 261? ☒ YES ☐ NO — IF YES, INDICATE E.P.A. HAZARDOUS WASTE #: D008

IS THIS A POLLUTION CONTROL WASTE AS DEFINED IN 35 IL. ADM. CODE 858? ☐ YES ☒ NO

COMPOSITION (must Total 100%)

COMPONENT NAME	%	COMPONENT NAME	%
Brick	98-99		
Lead	.5-1		

TRANSPORTATION/D.O.T. INFORMATION

HAZARDOUS MATERIAL DESCRIPTION (SEE 49 CFR 172.101): RQ Hazardous Waste, Solid, N.O.S.

HAZARD CLASS: ORM-E — UN/NA#: NA9189(D008)

IN PLANT DIRECTIONS:

THE UNDERSIGNED HEREBY STATES THAT HE/SHE IS AUTHORIZED TO SIGN THIS DOCUMENT ON BEHALF OF THE GENERATOR, AND THAT TO THE BEST OF HIS/HER KNOWLEDGE THE INFORMATION SET FORTH ABOVE IS TRUE AND CORRECT.

X Jim K. Klotz — NAME OF AUTHORIZED REPRESENTATIVE — X Jim K. Klotz — SIGNATURE — X 11/2/90 — DATE

FOR PEORIA DISPOSAL COMPANY USE ONLY

RGN#	PERMIT#	AUTHORIZATION	METH: FAC	I.D.#	EXPIRATION

SPECIAL CONDITIONS:

DRIVE TIME (ONE WAY)	IN PLANT TIME	APPROVED BY	DATE

MARKETING COPY

PESTICIDE/HERBICIDE
Declaration Letter

Dear Customer:

This declaration letter provides us with information to make a determination on the analytical parameters to be run on your waste stream. If, to the best of your knowledge, that your waste stream may contain any of these parameters as listed below please make a notation on this form. If, to the best of your knowledge, your waste stream does not contain these parameters as listed below, please read and sign this form.

By signing this document, J. L. Clark hereby certifies that
(Generator's Name)

that the waste stream as described on Waste Management Generator's Waste Material Profile Sheet # 07990 does not contain the following pesticides and herbicides: Endrin, Lindane, Methoxychlor, Toxaphene, 2, 4-D, 2, 4, 5-TP (Silvex), Chlordane and Heptachlor (and its hydroxide) unless clearly noted.

X Jim K. Kat
Generator's Signature

X CHEMIST / ENVIRONMENTAL ENGINEER
Title

X 11-2-90
Date

J. L. CLARK FAX

a member of the CLARCOR packaging products group

To: Dick Anderson, Bill Drayne

Date: 8-16-90

From: Jim Klotz

Copy: Gordon VerWeyst

Ref: JLC - Areas Tube

Sub: Lead Pot Bricks

Total pages 2 including this cover sheet.

MESSAGE

Attached is a copy of the analytical data for your files. Any questions, please call.

TENCO LABORATORIES DIVN. OF THX, INC.

1150 Junction Avenue - Schererville, Indiana 46375
1-219-322-2560 ● 1-800-428-3311

REPORT TO:
Sam Erwin
Environmental Waste Services
1641 Kensington
Aurora, IL 60506

Date: 7/31/90
Recd: 7/13/90
WO #: 22-2370

Laboratory Smp ID No.:	AA17401						
DESCRIPTION: —> (unless otherwise noted; results in parts per million - ppm) PARAMETERS: ↓	J.L. Clark Brick Waste						maximum concentratio (metals only
	AS RECEIVED	TOTAL	REACTIVE		TOTAL	EP TOXICITY	
FLASHPOINT-(140°F)	>200°F			SILVER		0.003	5.0 ppm
Percent Acidity				ARSENIC		<0.010	5.0 ppm
Percent Alkalinity	0.00			BARIUM		0.188	100.0 ppm
pH (2-12.5**)	7.1			CADMIUM		<0.002	1.0 ppm
Percent Total Solids	99.99			CHROMIUM***		<0.004	5.0 ppm
SULFIDE	<0.4		<0.4	MERCURY		<0.003	.2 ppm
CYANIDE	0.93		<0.93	LEAD		179	5.0 ppm
PHENOL	0.370			SELENIUM		<0.010	1.0 ppm
Paint Filter Test	Pass						
Specific Gravity	3.134						
TOX	250						
				*** Total			

Allowable Range

Certified by: Catherine Ort-Wiesels

J. L. CLARK FAX

a member of the CLARCOR packaging products group

FAX COPY SENT
Date: JUN 27 1990

To: Bill Pruyne

From: Jim Klotz

Copy: Dick Anderson, Gordon VerWeyst

Ref: JLC - ATLAS

Sub: Lead Pot firebrick

Total pages 2 including this cover sheet.

MESSAGE

Attached is a copy of the proposal from Environmental Waste Services. Please issue a purchase order for the permitting and analysis charges only. Please reference that analytical results be provided to Jim Klotz. Once a permit is secured, we can issue an additional purchase order to cover the actual disposal. Please send me a copy of your purchase order for our records. Any questions, please call.

ENVIRONMENTAL WASTE SERVICES, INC. (708) 897-5255

1641 Kensington Place
Aurora, Illinois 60506

June 22, 1990

Jim Klotz
J. L. CLARK MANUFACTURING
2300 Sixth Street
Rockford, IL 61125

Dear Mr. Klotz,

In response to our meeting, Environmental Waste Services is pleased to offer the following proposal for disposing of your brick contaminated with lead waste.

PERMITTING	$150
ANALYSIS	$450
DISPOSAL	$1,200 FOR 10 CUBIC YARDS
TRANSPORTATION	$600
DISPOSAL FACILITY	ALTRACHEM, INC
DISPOSAL METHOD	LANDFILL

The above prices are based on the assumption that the waste stream is nonhazardous. If you have any questions regarding this proposal, please give me a call.

Sincerely,

Sam Erwin
Sales Engineer

J.L.CLARK
a member of the CLARCOR packaging products group

Date: April 9, 1990

To: Bill Pruyne*/Dick Anderson*

By: Jim Klotz

Copies To: Greg Gann*/Gordon VerWeyst

FAX COPY SENT
APR 9 1990

Reference: J. L. Clark - Atlas tube

Subject: Lead Pot Waste Material

F.162

We have reviewed with the IEPA the status of disposing of this waste material. This would basically be considered special waste, unless the lead content exceeds the land ban criteria.

We will have to have the material analyzed and a waste permit issued for its disposal. We suggest that when we are at Atlas on April 17th, we review the materials involved and then determine how best to proceed with this disposal. If this presents any problems, please let us know.

/tkb

*Fax'd. 4/9/90

7 large boxes (1 cu yd) 7
2 55gal drums 2
20 small boxes (1 cu ft) 2
11 Cu yds.

brick refractory + lead oxide slag

J. L. Clark
A CLARCOR Company

Date: October 31, 1995

To: John Benton

By: Jim Klotz

Copies to:

Reference: J. L. Clark-Tube Division

Subject: Peoria Disposal

Following up your notice concerning expiration of our permit at Peoria Disposal, we can confirm your suspicion that we do not need to address this issue. This permit was issued to Peoria Disposal to accept lead based wastes from the Tube Division in the past. As we are no longer generating this waste stream, this permit can be retired. If you have any further questions, please let me know.

J.L. CLARK Tube Division
a member of the CLARCOR consumer products group

MEMO TO: Jim Klotz

DATE: October 13, 1995

FROM: John Benton

CC:

REFERENCE:

SUBJECT: EPA ASSISTANCE

Attached is information from the EPA indicating that Peoria Disposal Co. site permit is about to expire. It does not appear that we should do anything. Do you agree.

NUMBER OF PAGES 2

J.L. Clark - Tube Division
2300 Wisconsin Avenue
Downers Grove, Illinois 60515
PHONE: 708/969-6100
FAX: 708/969-8823

State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217/782-6762

SEPTEMBER 23, 1995

J L CLARK
ATTENTION:
2300 WISCONSIN AVE
DOWNERS GROVE , IL 605150000

GENERATOR NUMBER: 0438030002

DEAR SPECIAL WASTE GENERATOR:

SPECIAL WASTE DISPOSAL, TREATMENT, OR STORAGE PERMIT(S) NAMING YOUR FACILITY AS THE GENERATOR OF THE WASTE ARE DUE TO EXPIRE IN FEBRUARY 1996. WE HAVE INFORMED THE HOLDERS OF THESE PERMITS (THE DISPOSAL, TREATMENT, OR STORAGE SITE) OF THIS AND YOU MAY BE CONTACTED BY THEM TO PROVIDE WASTE STREAM INFORMATION FOR THEIR PERMIT RENEWAL APPLICATION. THE PERMITS AND SITES ARE LISTED BELOW FOR YOUR CONVENIENCE.

IT IS NOT NECESSARY FOR YOUR FACILITY TO CONTACT THE AGENCY, IN ORDER TO RENEW THE PERMITS. ONLY THE PERMITEE, I.E. THE DISPOSAL, TREATMENT, OR STORAGE SITE, CAN MAKE APPLICATION FOR A PERMIT.

IT CLEARLY IS IN YOUR INTEREST TO KNOW THAT THESE PERMITS WILL EXPIRE BECAUS THE SITE CAN NOT LEGALLY CONTINUE TO ACCEPT YOUR WASTE AFTER THE PERMIT EXPIRATION DATE UNLESS THE PERMIT HAS BEEN RENEWED.

	PERMIT AUTH #	(DISPOSAL, STORAGE, TREATMENT) SITE #	NAME	EXPIRE DATE	CURRENT CLASSIFICATI
1	910054	1438120003	PEORIA DISPOSAL CO INC	02/01/96	HAZ SUBJ FEE

Appendix G

State of Illinois
Department of Public Health

A011182

LICENSE, PERMIT, CERTIFICATION, REGISTRATION

The person, firm or corporation whose name appears on this certificate has complied with the provisions of the Illinois Statutes and/or rules and regulations and is hereby authorized to engage in the activity as indicated below.

JOHN R. LUMPKIN, MD
DIRECTOR

Issued under the authority of
The State of Illinois
Department of Public Health

EXPIRATION DATE	CATEGORY	I.D. NUMBER
05/15/93	500	500-0292

ACACIA ENVIRONMENTAL SERVICES, INC
ASBESTOS CONTRACTOR LICENSE

CONTACT: MARK HAINES

BUSINESS ADDRESS

ACACIA ENVIRONMENTAL SERVICES, INC
908 N MAIN ST
ROCKFORD IL 61103

Printed by Authority of the State of Illinois • 2/91 •

State of Illinois A011182
Department of Public Health
LICENSE, PERMIT, CERTIFICATION, REGISTRATION
ASBESTOS CONTRACTOR

EXPIRATION DATE	CATEGORY	I.D. NUMBER
05/15/93	500	500-0292

ACACIA ENVIRONMENTAL SERVICES, INC
ASBESTOS CONTRACTOR LICENSE
CONTACT: MARK HAINES
THIS LICENSE IS INVALID IF YOUR
INSURANCE CERTIFICATE IS NOT CURRENT

COMMERCIAL GENERAL LIABILITY DECLARATIONS

THIS IS A CLAIMS MADE POLICY. PLEASE READ THE ENTIRE FORM CAREFULLY.

POLICY NUMBER GLCM 200 1619 Renewal of Number GLCM 200 1509

UNITED CAPITOL INSURANCE COMPANY

Executive Offices -- Suite 130, 1400 Lake Hearn Dr.
Atlanta, Georgia 30319

Named Insured & Address
Acacia Environmental Services, Inc.
921 North Main Street
Rockford, IL 61103

Producer's Name & Address
Swett & Crawford
525 West Monroe
Chicago, IL 60661

Policy Period: From September 4, 1992 to September 4, 1993 at 12:01 A.M. Standard Time at your mailing address shown above.

IN RETURN FOR THE PAYMENT OF THE PREMIUM, AND SUBJECT TO ALL THE TERMS OF THIS POLICY, WE AGREE WITH YOU TO PROVIDE THE INSURANCE AS STATED IN THIS POLICY.

LIMITS OF INSURANCE

GENERAL AGGREGATE LIMIT (Other Than Products-Completed Operations)	$ 500,000.	
PRODUCTS-COMPLETED OPERATIONS AGGREGATE LIMIT	$ 500,000.	
PERSONAL & ADVERTISING INJURY LIMIT	$ 500,000.	
EACH OCCURRENCE LIMIT	$ 500,000.	
FIRE DAMAGE LIMIT	$ 50,000.	ANY ONE FIRE
MEDICAL EXPENSE LIMIT	$ Excluded	ANY ONE PERSON

NOTICE TO POLICYHOLDER: This contract is issued pursuant to Section 445 of the Illinois Insurance Code, by a company not authorized and licensed to transact business in Illinois and as such is not covered by the Illinois Insurance Guaranty Fund.

RETROACTIVE DATE
Coverage A of this insurance does not apply to "bodily injury" or "property damage" which occurs before the Retroactive Date, if any, shown below

Retroactive Date: September 4, 1991
(Enter Date or "None" if no Retroactive Date applies)

SURPLUS LINE ASSOCIATION OF ILLINOIS
OCT 01 1992
EXECUTIVE DIRECTOR

Form of Business: ☐ Individual ☐ Partnership ☐ Joint Venture ☒ Organization (Other than Partnership or Joint Venture)

Business Description: Asbestos Abatement Contractor

Location of All Premises You Own, Rent or Occupy: See Schedule on file with the Company

CLASSIFICATION	CODE NO.	PREMIUM BASIS	RATE	ADVANCE PREMIUM PR/CO	ADVANCE PREMIUM ALL OTHER
See Earned Premium and Composite Rate Endorsement Form UC406(11-88)				$ Incl.	$ 25,000
			Total	$ 25,000.	

DO NOT ASSIGN ADJUSTER OR ATTORNEY
IN CASE OF LOSS, REFER NOTICE IMMEDIATELY TO CLAIMS V.P.
UNITED CAPITOL INSURANCE
1400 LAKE HEARN DRIVE
ATLANTA, GA 30319
(404) 843-5599
IN CASE OF EMERGENCY ON WEEKEND OR HOLIDAYS
800-621-5410

MINIMUM EARNED PREMIUM: $ See UC406(11-88)

ENDORSEMENT(S) ATTACHED TO THIS POLICY: Broad Form Nuclear Exclusion (UC 029) CL101(2-86)CL448,UC040, UC224,UC254,UC267,UC271CGL/C,UC274,UC282,UC316,UC329,UC406,UC421,UC425,UC426, UC430,ASB-1,ASB-2,ASB-3,ASB-4

COUNTERSIGNED September 4, 1992 BY Steve Zeitman

typed 9/17/92sg (DATE) (AUTHORIZED REPRESENTATIVE)

ACACIA

ENVIRONMENTAL SERVICES, INC.

ENVIRONMENTAL CONSULTING, REMEDIATION & ABATEMENT SERVICES

MR. LARRY ZAPFEL
J.L. CLARK
2300 WISCONSIN AVE.
DOWNER'S GROVE, ILLINOIS 60515

MR. ZAPFEL, 11-23-92

WE PROPOSE TO SUPPLY ALL NECESSARY PERSONNEL, EQUIPMENT, SUPERVISION, AIR SAMPLING AND DISPOSAL TO PROPERLY **REMOVE** APPROXIMATELY 16 LINEAR FEET OF THERMAL SYSTEMS INSULATION IN THE LOFT AREA OF YOUR FACILITY LOCATED AT 2300 WISCONSIN AVE. DOWNER'S GROVE, IL. FOR THE SUM OF EIGHT HUNDRED DOLLARS ($800.00).

SCOPE OF WORK IS AS FOLLOWS:
- NOTIFICATION OF STATE AND FEDERAL REGULATORY AGENCIES AS REQUIRED
- ALL REMOVAL WILL BE PERFORMED BY ILLINOIS LICENSED PERSONNEL
- RESPIRATORY PROTECTION TO COMPLY WITH OSHA 1926 . ANSI Z88.2-20
- AIR MONITORING TO COMPLY WITH OSHA 1926.58 AND AS PER JOB SPECIFICATIONS
- COMPLIANCE WITH ENVIRONMENTAL PROTECTION AGENCY'S (EPA) 40 CFR PART 61
- OWNER TO SUPPLY ELECTRICAL AND WATER SOURCES AT NO EXPENSE TO CONTRACTOR
- WET REMOVAL METHODS
- SEALING THE ABATED AREAS WITH AN ENCAPSULANT
- DISPOSAL WILL BE IN FULL COMPLIANCE WITH EPA SECTION 61.52
- THE OWNER WILL BE REQUIRED TO HOLD HARMLESS AND INDEMNIFY ACACIA ENVIRONMENTAL SERVICES FOR PRIOR ACTS AND PRE-EXISTING CONDITIONS REGARDING EXPOSURE TO ASBESTOS

THANK YOU FOR THE OPPORTUNITY TO SUPPLY YOU WITH A BID ON THIS PROJECT. IF WE CAN BE OF FURTHER ASSISTANCE OR ANSWER ANY QUESTIONS REGARDING THIS PROPOSAL, PLEASE DO NOT HESITATE TO CONTACT US.

ACACIA ENVIRONMENTAL SERVICES,

Mark S. Haines

MARK S. HAINES / PROJECT MANAGER

921 North Church Street ▲ Rockford, Illinois 61103 ▲ 815•968•5397

ENVIRONMENTAL LABORATORIES INC.

11/18/92

ASBESTOS
LABORATORY REPORT

A776 8479300 W04
CS/* / / /

CHAIN OF CUSTODY

ACACIA ENVIRONMENTAL
921 N. CHURCH STREET
ROCKFORD ,IL 61103
ATTN: TOM DISHNO

SAMPLE NUMBER - 92318-A08516
CLIENT SAMPLE - PIPE INSULATION
LOCATION/PERSONNEL - J.L. CLARK-DOWNERS GROVE

ASBESTOS IDENTIFICATION

SAMPLE DESCRIPTION :
TAN HOMOGENEOUS LOOSE MATERIAL WITH WOVEN FIBER LAYER

CHRYSOTILE ASBESTOS	15 %
AMOSITE ASBESTOS	10 %
CELLULOSE	40 %
AMORPHOUS MATERIAL	35 %

DATE COLLECTED - 11/12/92 DATE RECEIVED - 11/13/92
SAMPLED BY - ACACIA ENVIRONMENTAL
QUANTITATION METHOD - EQUIVALENT ESTIMATION

ANALYTICAL METHOD - POLARIZED LIGHT MICROSCOPY WITH DISPERSION STAINING
ANALYST - C. GIBES
DATE OF ANALYSIS - 11/17/92

TEST RESULTS HEREIN RELATE ONLY TO THE SAMPLE ANALYZED ABOVE. REPORT MAY NOT BE REPRODUCED OR USED TO CLAIM PRODUCT ENDORSEMENT OR PRODUCT IDENTIFICATION BY CBC OR ANY OTHER AGENCY.
PLM ANALYSIS MAY NOT PRODUCE CONSISTENTLY RELIABLE RESULTS IN QUANTIFYING ASBESTOS AT THE DETECTION LIMIT FOR FLOOR TILE AND ROOFING SAMPLES; TEM ANALYSIS OF SUCH SAMPLES MAY BE ADVISABLE.

NIOSH MANUAL OF ANALYTICAL METHODS, 3RD EDITION. EPA 40 CFR PART 763; 'INTERIM METHOD FOR THE DETERMINATION OF ASBESTOS IN BULK SAMPLES' TEST METHOD. N/R = NOT RECEIVED
AIHA CERTIFICATE # 53154-001. NVLAP # 1028; PLM AND TEM ACCREDITED. ELAP # 10906.
SAMPLES WILL BE STORED FOR 6 WEEKS BEFORE DISPOSAL UNLESS OTHERWISE SPECIFIED.
IF YOU HAVE ANY QUESTIONS PLEASE CONTACT OUR CLIENT SERVICE DEPARTMENT. APPROVAL

DAILY PROJECT LOG

DATE: 01/09/93

PROJECT: JL CLARK - DOWNERS GROVE

START TIME: 10:30

PROJECT MGR: DARIN BAUGHMAN

QUIT TIME: 4:30

INDUSTRIAL HYGIENIST: DARIN BAUGHMAN

PROJECT DESIGNER: N/A

BUILDING OFFICIAL: LARRY ZAPFEL

NAMES OF WORKERS

1. N/A	6.	12.
2.	7.	13.
3.	8.	14.
4.	9.	15.
5.	10.	16.
	11.	17.

JOB SUPERINTENDENT: N/A

FOREMAN: N/A

COMMENTS AND/OR NOTES (LIST ALL VISITORS AND UNUSUAL EVENTS)

ARRIVED AT JL CLARK & SET UP ALL EQUIP. NEXT I HUNG ALL 4 GLOVEBAGS & THEN TO LARRY ZAPFEL AND HIS BOSS WHAT THEY WERE & HOW THE JOB WOULD BE DONE. I USED NEG. PRESSURE GLOVEBAG METHOD. I RAN INTO TROUBLE BECAUSE THE WERE SO MANY WIRES ATTACHING THE INSULATION TO THE PIPE. WHEN I HAD FINISHED I DOUBLE BAGGED ALL MATERIAL & ENCAPSULED THE PIPE.

SIGNATURE OF INDIVIDUAL PREPARING LOG: Darin Baughman

ACACIA WORK SITE ENTRY LOG

JOB NAME JLCLARK - DOWNERS GROVE JOB TYPE ~~[illegible]~~ REMOVAL DATE 01-09-93

NAME	COMPANY	TITLE	TASK	IN	OUT	IN	OUT
DARIN BAUGHMAN	ACACIA	SUPERVISOR	GLOVEBAG	10:30	4:30		

ACACIA ENVIRONMENTAL SERVICES, 921 NORTH CHURCH STREET, ROCKFORD, ILLNOIS 61103 (815) 968-5397

J. L. CLARK
DOWNERS GROVE

R93-02

SAMPLE RESULTS SUMMARY

ACTIVITY	DATE	NUMBER	TYPE	LOCATION	RESULTS
Glovebag	1/9/93	1	WORK AREA		0.029 UCL 0.016 F/CC
"	1/9/93	2	PERSONNEL	DARIN BAUGHMAN	0.029 UCL 0.009 F/CC
					UCL F/CC
					UCL F/CC
					UCL F/CC
					UCL F/CC
					UCL F/CC
					UCL F/CC
					UCL F/CC
					UCL F/CC
					UCL F/CC
					UCL F/CC
					UCL F/CC
					UCL F/CC
					UCL F/CC
					UCL F/CC
					UCL F/CC
					UCL F/CC

Applicant: This Application is a:

New Application N/A
Renewal X 2909 S.W.H. Permit No.
Added Vehicle N/A S.W.H. Permit No.
Expiration date of previously issued S.W.H. Permit 12/31/92

P.O. Box 19276
Springfield, IL 62794-9276

FOR AGENCY USE ONLY

Expiration Date	Total Vehicles Permitted	Transporter Number
Dec. 31 1993	0001	2909

APPLICANT: COMPLETE (TYPE OR PRINT IN INK) ITEMS 1 THROUGH 7. IF A SPECIFIC ITEM DOES NOT APPLY TO YOUR COMPANY ENTER N/A. FOR NOT APPLICABLE. INCOMPLETE OR PHOTOCOPIED FORMS WILL BE REJECTED. DENIED APPLICATION WILL RESULT IN FORFEITURE OF $250.00 SPECIAL WASTE HAULING PERMIT APPLICATION FEE.

NOTE: SEPARATE APPLICATION MUST BE SUBMITTED FOR EACH ADDITIONAL OWNER

1. ACACIA ENVIRONMENTAL SERVICES, INC.
Business Name of Hauling Company
921 NORTH CHURCH STREET
Company Location (Not P.O. Box)
921 NORTH CHURCH STREET
Mailing Address
ROCKFORD, ILLINOIS 61103
City State Zip
WINNEBAGO
County
Business Phone 815/ 968-5397

1-A. Name and Home Address of Principal or Authorized Representative and Business Title
WILLIAM BRADLEY (PRESIDENT)
4308 RUSKIN ROAD
ROCKFORD, IL 61101
Emergency Phone 815/ 968-9631

2. BRADLEY BUILDING CORP
Business Name of Owner of Vehicles
924 NORTH MAIN STREET
Address
ROCKFORD, IL 61103
City State Zip
WINNEBAGO
County
Business Phone 815/ 968-9631

2-A. Name and Home Address of Principal or Authorized Representative and Business Title
CHARLES M. BRADLEY
3203 LANDSTROM ROAD
ROCKFORD, IL 61107
Emergency Phone 815 / 877-8500

3. ____ Do you have an Illinois Commerce Commission Certificate? YES____ NO X If yes list Certificate Number____
4. ____ Do you have an Interstate Commerce Commission Certificate? YES____ NO X If yes list Certificate Number____
5. ____ Have you been issued a Federal Hazardous Waste Transporter Identification Number? YES____ NO X
If yes list Federal Identification Number _ _ _ _ _ _ _ _ _ _ _ _
6. Vehicle Descriptions. Provide information for each vehicle to be approved to haul special waste on following page(s). (Up to 30 vehicles per sheet).
7. EFFECTIVE JANUARY 1, 1988, IN ACCORDANCE WITH SECTION 22.2 OF THE ENVIRONMENTAL PROTECTION ACT, EACH APPLICATION RECEIVED ON OR AFTER JANUARY 1, 1988 MUST BE ACCOMPANIED BY $250.00 SPECIAL WASTE HAULING PERMIT APPLICATION FEE (CASHIER'S CHECK, CERTIFIED CHECK, OR MONEY ORDER) MADE PAYABLE TO TREASURER, STATE OF ILLINOIS, CALCULATED IN THE FOLLOWING MANNER:

OPERATOR'S PERMIT FEE (Check One): ____ NEW RENEWAL X
____ ADDED (no operator fee) @ $250.00 (1) $ 250.00

VEHICLE PERMIT(S):
Number of New Vehicles 0
Number of Renewal Vehicles 1
Number of Added Vehicles 0
Total Number of Vehicles 1 @ $20 (2) 20.00 Total Fee (1)+(2) $ 270.00

USE THE ENCLOSED, PREPRINTED MAILING LABEL TO SEND THE APPLICATION AND FEE TO:

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
SPECIAL WASTE HAULING

I, the undersigned, certify that the information contained herein is true and complete and that the removal, transporting and disposal, storage or treatment of special wastes will comply with all requirements of Title 35, Section 809.202. (Both must be signed and dated)

Signature of Vehicle Owner (or Authorized Representative)	Date	Signature of Hauling Company Manager (or Authorized Representative)	Date
	10-30-92		10-30-92

This Agency is authorized to require this information under Illinois Revised Statutes, 1979, Chapter 111 1/2, Section 1039. Disclosure of this information is required under that Section. Failure to do so may prevent this form from being processed and could result in your application being denied. This form has been approved by the Forms Management Center.

FOR AGENCY USE ONLY

Reviewed By	Date	Issued	Date
	12-1-92		12-1-92

RECEIVED
NOV 09 1992
IEPA-DLPC

Expiration Date: Dec. 31 1993

IL 532-0333
LPC 37 Rev. 09/87

ACACIA ENVIRONMENTAL SERVICES, INC.
Company Name

Dec. 31 1993
Expiration Date

2909
Transporter Number

7. State from which license plates are issued, license plate number(s), vehicle (parts a and b) and description (parts a and b) must be completed for each vehicle to be permitted. Tractor-trailer units, complete information for trailer only. Roll-off boxes, complete information for tractor and give a range for "capacity"

'E SURE APPLICATION IS COMPLETE!

	STATE LICENSE PLATE NO.	VEHICLE	DESCRIPTION
	a. State b. License Plate	a. Make-Model-Year b. Identification No.	a. Type (tank trailer, flatbed, rolloff, etc.) b. Capacity (gal., barrels, cu. ft.)
1.	a. ILLINOIS b. 530 584 B	a. FORD F150 / 1986 b. IFTEX14N9GKA3093	a. PICK UP b. 97 CUBIC FEET
2.	a. b.	a. b.	a. b.
3.	a. b.	a. b.	a. b.
4.	a. b.	a. b.	a. b.
5.	a. b.	a. b.	a. b.
	a. b.	a. b.	a. b.
7.	a. b.	a. b.	a. b.
8.	a. b.	a. b.	a. b.
9.	a. b.	a. b.	a. b.
10.	a. b.	a. b.	a. b.
11.	a. b.	a. b.	a. b.
12.	a. b.	a. b.	a. b.
	a. b.	a. b.	a. b.

RECEIVED
NOV 0 9 1992
IEPA-DLPC

IL 532-0333
LPC 37 Rev. 11/84

OVER

WSR #

WASTE SHIPMENT RECORD

Generator

1. Work Site Name and Mailing Address
JL CLARK
2300 WISCONSIN AVE
DOWNERS GROVE IL 60515

Owner's Name: LARRY ZAPFEL

Owner's Phone No.: (708) 969-6100

2. Operator's Name and Address
ACACIA ENVIRONMENTAL SERVICES, INC.
921 NORTH CHURCH STREET
ROCKFORD, ILLINOIS 61103

Operator's Phone No.: (815) 968-5397

3. Waste Disposal Site (WDS) Name, Mailing Address, and Physical Site Location
WINNEBAGO RECLAMATION
8403 LINDEN WOOD RD.
ROCKFORD IL 61109

WDS Phone No.: (815) 874-4806

4. Name, and Address of Responsible Agency ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
2200 CHURCHILL ROAD, P.O. BOX 19276
SPRINGFIELD, ILLINOIS 62794-9276
ATTN: OTTO KLEIN

5. Description of Materials	6. Containers No.	Type	7. Total Quantity m^3 (yd^3)
HAZARDOUS SUBSTANCE, SOLID N.O.S. (ASBESTOS) RQ ORM-E NA 9188			
WETTED, DOUBLE BAGGED, FRIABLE, THERMAL	05	BA	.5
SYSTEMS INSULATION			

8. Special Handling Instructions and Additional Information

9. OPERATOR'S CERTIFICATION: I hearby 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 government regulations.

Printed / Typed Name & Title	Signature	Month	Day	Year
DARIN BAUGHMAN	[signature]	01	11	93

Transporter

10. Transporter 1 (Acknowledgment of Receipt of Materials)

Printed / Typed Name & Title	Signature	Month	Day	Year
DARIN BAUGHMAN Address and Telephone No. 921 N. CHURCH ST (815) 968-5397 ROCKFORD IL 61103	[signature]	01	11	93

11. Transporter 2 (Acknowledgment of Receipt of Materials)

Printed / Typed Name & Title	Signature	Month	Day	Year
Address and Telephone No.				

Disposal Site

12. Discrepancy Indication Space

13. Waste Disposal Site Owner or Operator:
Certification of receipt of asbestos materials covered by this manifest except as noted in item 12.

Printed / Typed Name & Title	Signature	Month	Day	Year

North East Elevation

LANDFILL SIGNED WASTE MANIFEST
TO BE FORWARDED UPON RECEIPT

A016312

State of Illinois
Department of Public Health

LICENSE, PERMIT, CERTIFICATION, REGISTRATION

The person, firm or corporation whose name appears on this certificate has complied with the provisions of the Illinois Statutes and/or rules and regulations and is hereby authorized to engage in the activity as indicated below.

JOHN R. LUMKIN, M.D.
DIRECTOR

Issued under the authority of
The State of Illinois
Department of Public Health

EXPIRATION DATE	CATEGORY	I.D. NUMBER
05/15/93	100	100 - 5220

DARIN BAUGHMAN

SUPERVISOR

BUSINESS ADDRESS

DARIN BAUGHMAN
1180 NORTH CHURCH ST. APT. 1
ROCKFORD IL 61103

THIS LICENSE IS NOT VALID IF YOUR IDPH
REFRESHER COURSE CERTIFICATE IS NOT CURRENT

Printed by Authority of the State of Illinois • 2/91 •

State of Illinois A016312
Department of Public Health
LICENSE, PERMIT, CERTIFICATION, REGISTRATION
ASBESTOS PROFESSIONAL LICENSE

EXPIRATION DATE	CATEGORY	I.D. NUMBER
05/15/93	100	100 - 5220

DARIN BAUGHMAN

SUPERVISOR

THE PERSON, FIRM OR CORPORATION WHOSE NAME APPEARS ON THIS CERTIFICATE HAS COMPLIED WITH THE PROVISIONS OF THE ILLINOIS STATUTES AND/OR RULES AND REGULATIONS AND IS HEREBY AUTHORIZED TO ENGAGE IN THE ACTIVITY INDICATED ON THE FACE OF THIS CARD.

ISSUED UNDER THE AUTHORITY OF
STATE OF ILLINOIS
DEPARTMENT OF PUBLIC HEALTH

SIGNATURE OF LICENSEE

CERTIFICATE OF ACHIEVEMENT
ASBESTOS ABATEMENT

Accredited by the Illinois Department of Public Health

This is to certify that DARIN BAUGHMAN 377-78-2534
has completed the Contractor/Supervisor Initial Asbestos Training
course and passed the examination on
with a minimum score of 70% or better.

Training was conducted in accordance with USEPA 40 CFR 763 Subpart E, Appendix C, Asbestos-Containing Materials in Schools: Model Accreditation Plan authorized by the Asbestos Hazard Emergency Response Act (AHERA), and only pertains to training for purposes of licensure required pursuant to the Illinois Asbestos Abatement Act and Rules and Regulations.

May 26 - May 29, 1992

Course Dates

May 29, 1993

Expires

PUBLIC HEALTH & SAFETY INC.
2648 North Greenview, Chicago, Illinois 60614

Director of Training

Nicholas Peneff
Doctor of Public Health

(312) 525-8258

NUMBER: 9205CS-08

MEDWORKS
Occupational Care Center

1345 Charles Street
Rockford, Illinois 61104 • (815) 227-4700

Charles S. DeHaan, M.D.
Robin F. Borchardt, M.D.
Gregory A. Grubb, D.O.

Respiratory Compliance Letter

Name Darin Baughman Date 6/10/92

Employer: CW Bradley

Respiratory Compliance Letter
(for Respiratory Compliance Exam)

TO WHOM IT MAY CONCERN:

This letter is in accordance with OSHA regulation 5144 (h) which states that employees should not be assigned jobs which may require the use of a respirator unless they have been medically cleared to use such equipment.

The medical status of the employee named above has been evaluated and the individual:

- [x] Is qualified to use a respirator.
- [ ] Is NOT qualified to use a respirator.
- [ ] Requires a respirator which allows for the wearing of corrective lenses.

x C Scott
Signature of Examining Physician
1345 Charles Street
Rockford, IL 61104

MEDWORKS OCCUPATIONAL CARE CENTER
1345 Charles Street
Rockford, IL 61104
(815) 227-4700
FAX #(815)227-4726

COMPANY: CW Bradley
DATE: 6/10/92

NAME: Darin L. Baughman PHONE: 964-6418 SS#: 327-78-2534
ADDRESS: 1136 N. Church St., # 1 CITY: Rockford STATE: IL ZIP: 61103
AGE: 19 DOB: 11-10-72 SEX: M WEIGHT: 140 HEIGHT: 5'8"
MEDICAL HISTORY: 0
SURGICAL HISTORY: 0
BACK INJURY: 0
FRACTURE HISTORY: R Index Finger 5 yrs. ago
ALLERGIES: 0
MEDICATIONS: OTC sinus med.

VISION: R 20/20 L 20/20 CORRECTED: R 20/ L20/
COLOR PERCEPTION: Normal GLASSES: No CONTACTS No
TEETH & GUMS: Good Repair
NASAL: Normal
MOUTH & THROAT: Normal
EARS: Normal AUDIOGRAM:
HEART: Normal EKG:
PULSE: 64 BLOOD PRESSURE: 122/62
LUNGS: Clear
PULMONARY FUNCTION: RESPIRATOR USE:
SMOKING HISTORY: No
ABDOMEN: Normal
HERNIA: None
REFLEXES: Normal
DEFORMITIES OR LIMITATIONS OF MOTION:
SHOULDERS/ARMS: Normal
WRISTS/HANDS: Normal
BACK: Normal
LEGS: Normal
KNEES: Normal
FEET: Normal
NERVE PACE STUDY:
SKIN: Normal
LABORATORY FINDINGS:

ADDITIONAL TEST (when indicated): P.F.

REMARKS:

RECOMMENDATIONS:

JOB CLASSIFICATION
A - Heavy
B - Med. Heavy
C - Light
D - Very Light

Signed _____, M.D.

MedWorks Occupational Care Center
1345 CHARLES STREET
ROCKFORD, ILLINOIS 61104

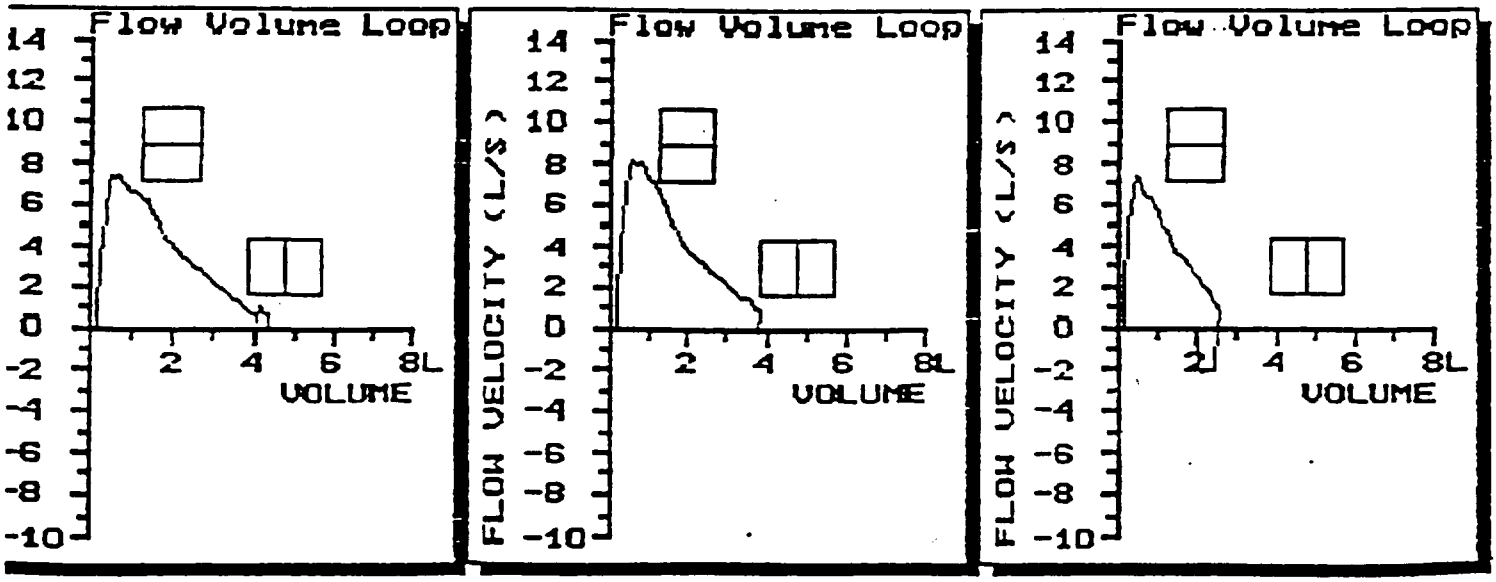
327-78-2534 Baughman, Darin
nic: CAUCASIAN Height: 68.0 in. Sex: MALE Age: 19
MENTS:
T TEST COMMENTS:

T CALIBRATED: Wed Jun 10,1992 8:26:39 am

T DATE:	Wed Jun 10,1992		Wed Jun 10,1992		Wed Jun 10,1992			
T TIME:	10:01:06 am		10:01:50 am		9:59:42 am			
MALS:	KNUDSON/IMTS		KNUDSON/IMTS		KNUDSON/IMTS			
	Best Test #2		2nd Best Test #3		3rd Best Test #1			
ameter	Actual	%Predicted	Actual	%Predicted	Actual	%Predicted	PRED	
	4.33 L	91.93 %	3.79 L	80.44 %	2.60 L	55.17 %	4.71	
0.5	2.47 L	84.11 %	2.47 L	84.22 %	2.03 L	69.30 %	2.93	
1.0	3.40 L	83.90 %	3.39 L	83.72 %	2.55 L	62.83 %	4.05	
3.0	4.33 L	0.00 %	3.79 L	0.00 %	2.60 L	0.00 %	0.00	
0.5/FVC	57.00 %	91.49 %	65.24 %	104.71 %	78.26 %	125.62 %	0.62	
1.0/FVC	78.52 %	91.26 %	89.55 %	104.08 %	97.99 %	113.90 %	0.86	
3.0/FVC	100.00 %	0.00 %	100.00 %	0.00 %	100.00 %	0.00 %	0.00	
	7.27 L/S	84.91 %	8.10 L/S	94.71 %	7.23 L/S	84.52 %	8.56	
25-75%	3.00 L/S	66.26 %	3.60 L/S	79.38 %	3.66 L/S	80.68 %	4.53	
75-85%	1.08 L/S	0.00 %	1.76 L/S	0.00 %	1.82 L/S	0.00 %	0.00	
25%	6.34 L/S	0.00 %	6.85 L/S	0.00 %	6.27 L/S	0.00 %	0.00	
50%	3.26 L/S	62.95 %	3.78 L/S	72.93 %	3.69 L/S	71.21 %	5.18	
75%	1.43 L/S	57.30 %	2.15 L/S	85.71 %	2.11 L/S	84.24 %	2.50	
.2-1.2	6.60 L/S	0.00 %	7.13 L/S	0.00 %	5.73 L/S	0.00 %	0.00	
	0.00 L		0.00 L		0.67 L			
1	0.00 L		0.00 L		0.67 L			
	0.00 L/S		0.00 L/S		2.44 L/S			
50	0.00 L/S		0.00 L/S		2.23 L/S			
50/FIF50	0.00 %		0.00 %		165.21 %			

INTERPRETATIONS

MAL	NORMAL	MILD RESTRICTION



BEST TEST -7.10% BEST -33.45% BEST

MEDWORKS

Occupational Care Center

1345 CHARLES STREET
ROCKFORD, ILLINOIS 61104
(815) 227-4700 • FAX (815)227-4726

X-RAY REPORT

X-RAY #: 1319 DATE June 10, 1992

PATIENT BAUGHMAN, DARIN L. AGE 19 STATUS CW Bradley

PHYSICIAN EXAM Chest

SS #:

PA view of the chest reveals the lungs are clear of infiltrates without effusions or atelectasis. The pulmonary vessels are normal. The cardiac silhouette is normal.

CONCLUSION: Normal chest.

M.R. TRAILL, M.D./cm

Physician

Radiologist

RESPIRATOR FIT TEST RECORD

EMPLOYEE DARIN BAULGHMAN DATE 9/24/92

SOCIAL SECURITY NO. 327-78-2534 FACILITY LIVBRADLEY TITLE PROJECT MANAGER

		MFR.	MODEL	SIZE
RESPIRATOR(S) SELECTED	(1)	WILLSON	PAPR	MEDIUM
	(2)	WILLSON	HALF FACED	MEDIUM
	(3)			
	(4)			

Odor Sensitivity test ☒ passed ☐ failed (check one)

Taste Sensitivity test ☐ passed ☐ failed (check one)

Conditions that may affect Respirator Fit Test (check)

- ☐ Beard Growth
  - ☐ 1-2 days
  - ☐ 3-7 days
  - ☐ Full beard
- ☐ Side burns
- ☐ Facial Scars
- ☐ Wrinkles
- ☐ Dentures Absent
- ☐ Ruptured Ear Drum

Pertinent Medical Conditions

- ☑ No known Respiratory Problems
- ☑ No known Cardiac Problems
- ☐ Others.

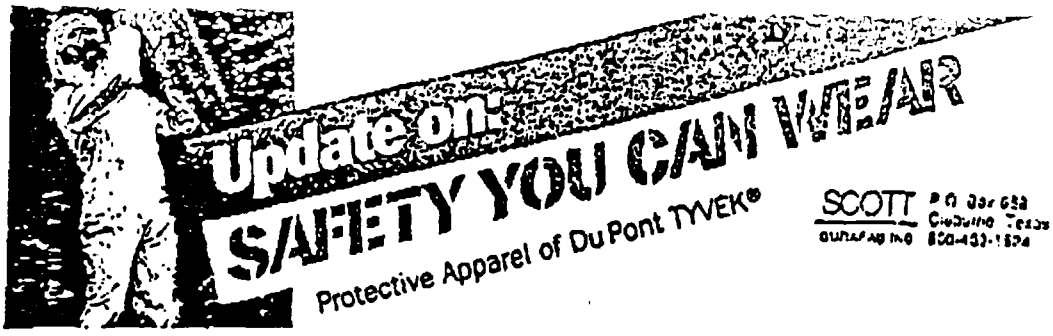
RESPIRATOR FIT TEST PREFORMED	RESPIRATOR (1)	(2)	(3)	(4)
Postive Pressure	ok	ok		
Negative Pressure	ok	ok		
Isoamyl Acetate				
Saccharin				
Irritant Smoke	ok	ok		

Respirator(s) assigned: (1) ~~[illegible]~~ CW1 (2) 2F041

Prescription Eyeglass adapter required: YES NO X

Employee Signature

Test Administered by 1309



SCOTT

Asbestos Update

Comfort of protective apparel Fact versus Fiction

FICTION: Breathability means comfort.

FACT: When it's hot, it's hot. When it's not, it's not.

Just like Jerry Reed's song states, studies at Multi-Tech Corp., a noted comfort research facility, have shown that in relationship to ordinary work clothing, protective garments are not when the temperature and humidity are high and are not when the temperature and humidity are low.

These studies also show the "breathable" fabrics to be only slightly more comfortable than TYVEK® and only in very narrow temperature and humidity conditions...when it's 90°F/25% RH and 85°F/50% RH.

The reasons for this are simple. Comfort in a human being is related to heat and sweat in contact with the skin. A person, at work, must exchange 200-300 calories and approximately 500 grams of moisture per hour with the environment. This exchange is influenced most by the:

- Environment—hot and humid conditions decrease the ability to make this exchange.
- Fabric—the moisture transport properties determine a fabric's capacity to absorb and move moisture and heat from the inside to the outside.

The moisture transport properties of polyethylene and polypropylene are very similar and neither come close to nature's own...cotton.

We, at Du Pont, are working to modify the moisture transport properties of TYVEK to give increased comfort without sacrificing protection...which is why the garments are worn in the first place.

Asbestos removal and protective apparel Fact versus Fiction

FICTION: Breathable fabrics give protection against asbestos equal to TYVEK.

FACT: You can't have your cake and eat it, too.

Over the past two years, TYVEK 1422A has been tested on several occasions by the A.D. Little Company under the same conditions as the "breathable" SMS fabrics.

The results show TYVEK to prevent in excess of 99% of the fibers of 0.5 micron and smaller from penetrating; whereas the "breathable" fabric allowed an average of 32% to penetrate.

FICTION: Small (0.5 micron) asbestos fibers are not hazardous.

FACT: If you believe that, you could be in BIG Trouble.

The National Institute of Occupational Safety and Health notes that "the size and shape of the fibers are important factors; fibers less than 0.5 microns are the most active in producing tumors."

The National Cancer Institute reports that studies done on actual tissue of dead asbestos cancer victims reveal that "all asbestos fibers examined in the lung" were less than 0.5 microns in diameter."

FICTION: Asbestos removal represents only a respiratory hazard.

FACT: You could be dead wrong.

The Asbestos Control Forum—Fall 1983 stated "medical data which has emerged during the last few years suggests that asbestos removal workers may be endangered by asbestos fibers which can 'migrate' into the body through openings other than the nose and mouth." Rectal and genital cancer has been documented.

TYVEK spunbonded cloth is a registered trademark of the Du Pont Company.

We believe this information is the best currently available from Du Pont. It is subject to revision as additional knowledge and experience are gained. Test data herein reflect laboratory performance of fabrics only and not the complete garment. Accordingly Du Pont makes no guarantee of results and assumes no obligation or liability in connection with this information. Anyone intending to use information contained in this publication should verify that the garment selected is suitable for the intended use and meets all applicable health standards. This publication is not a license to operate under, or implied to suggest infringement of, any existing patent. Note: Fabrics of TYVEK should not be used near heat, flame, sparks or potentially explosive environments.

Protective Apparel of Du Pont TYVEK

SAFETY YOU CAN WEAR

DURA FAB P.O. Box 658 Cleburne, Texas 76031 817-645-1824

ASBESTOS

Fabrics of Du Pont TYVEK® protect against asbestos fibers

A fabric with maximum barrier protection is one of the best personal safeguards during asbestos removal operations.

Du Pont TYVEK fits the bill.

TYVEK Protects

TYVEK protects against asbestos fibers of all sizes. Others claim their fabrics protect against fibers greater than 5 microns, but it is a known fact that fibers smaller than 5 microns are also unsafe.

- Asbestos fibers of less than 0.5 microns in diameter have been recognized as common in causing cancer. These small fibers also make up a large percentage of airborne asbestos.
- According to the National Institute of Occupational Safety and Health (NIOSH), "the size and shape of the fibers are important factors; fibers less than 0.5 microns are the most active in producing tumors."
- Additional studies have suggested that asbestos removal workers are endangered by asbestos fibers which can migrate into the body through openings other than the nose and mouth. Rectal and genital cancer have been documented.

Test results from independent labs have shown that Du Pont TYVEK protective apparel fabrics prevent in excess of 99% of the fibers that are less than 0.5 microns in diameter from penetrating; whereas, "breathable" fabrics allow up to 32% of these hazardous fibers to penetrate.

The Occupational Safety and Health Administration (OSHA) requires that a protective garment be worn by workers during asbestos removal operations. In fact, the Federal Register states, in Appendix G, "Protective Clothing: You are required to wear protective clothing in work areas where asbestos...concentrations exceed the permissible exposure limit of 0.2 f/cc [illegible] contamination of the skin;" in Appendix F, "Disposable coveralls: Employees involved in asbestos removal operations should be provided with disposable impervious overalls..."

This is why a protective fabric with maximum barrier protection is one of the best personal safeguards in asbestos removal operations. Garments made of Du Pont TYVEK offer the best worker protection against asbestos fibers of all sizes.

DU PONT

TYVEK Performs

- Years of demonstrated performance in commercial, public and industrial asbestos abatement projects.
- TYVEK is strong and durable for reliable protection.
- TYVEK is light weight.
- Properly sized and designed garments of TYVEK protect from contamination of harmful fibers that could be carried from the workplace into the home.

Why TYVEK?

Du Pont TYVEK spunbonded olefin is a unique fabric structure, consisting of very small continuous fibers which overlap to form a dense, almost impenetrable shield against the smallest asbestos fibers. No other protective fabric is as effective a barrier against asbestos as TYVEK.

Other fabrics allow passage of the small asbestos fibers which cannot be detected by the naked eye or an optical microscope.

How to buy garments of Du Pont TYVEK

Du Pont makes fabrics of TYVEK, not garments. For information on ordering protective garments of TYVEK, call your local Safety Equipment Distributor or call Du Pont at 1-800-44-TYVEK.

Specify garments of TYVEK that carry a Safety Equipment Institute certification label. SEI offers third-party certification of compliance with ANSI/ISEA 101-1985, a minimum sizing and labeling standard for limited-use protective coveralls. Ensure better fit, comfort and performance—look for the SEI label.

Protective Apparel Fabrics of TYVEK
Du Pont Company
Fibers Marketing Center
Wilmington, DE 19898
1-800-44-TYVEK

DU PONT

TYPICAL PHYSICAL PROPERTIES

	Comfort-Gard™ I	Kleenguard ®	Tyvek ®
FABRIC PROPERTIES			
Fabric Weight	1.75 oz/sqyd	1.2–1.7 oz/sqyd	1.2 oz/sqyd
STRENGTH			
Grab Strength			
MD (Machine Direction)	20 lbs.	18–23 lbs.	17 lbs.
CD (Cross Direction)	22 lbs.	15–28 lbs.	18 lbs.
Tear Strength (Trap Tear)			
MD	10	4–7	5
CD	10	5–8	6
Burst Strength (to 50 lbs)	Did not burst	Did not burst	Did not burst
Elongation	85%	35%–40%	15%
LIQUID RESISTANCE/BARRIER			
Hydrostatic Head	56 cm	56 cm	56 cm
Dynamic Impact	<0.1 g	<0.1 g	<0.1 g
PARTICULATE HOLDOUT/BARRIER*			
Small Particle	87%	70%–80%	99.9%
(Test Dust)	0.5 Micron	0.5 Micron	0.5 Micron
OTHER			
Air Permeability	60 cfm	60 cfm	1 cfm
Flammability	Class 1	Class 1	Class 1

Actual fabric physical properties may vary. Physical Property Data from manufacturers published literature.

* Based on independent test results.

Comfort–Gard ™ is a Trademark of Scott Paper Company
Tyvek ® is a Registered Trademark of E.I. DuPont de Nemours
Kleenguard ® is a Registered Trademark of Kimberly-Clark Corporation

Powered-Air Purifying Respirators: 6000 Series

Whether you want to build an entire respirator program around 6000 Series interchangeability, or you're simply looking for a more comfortable PAPR, here's the place to start.

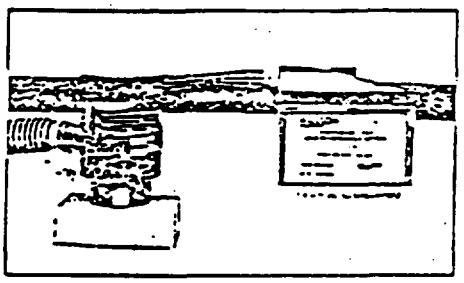
This is the basic unit from which conversions to other 6000 Series configurations are most economical.

Designed for comfort and durability

This lightweight product features a low-profile, belt-mounted blower for comfortable weight distribution behind and out of a worker's way. Fatigue and interference caused by awkward facepiece-mounted blowers are eliminated. The HEPA filter position prevents water entry during decontamination showers.

The Willson PAPR is rugged enough to withstand harsh environments and worker abuse. A molded wiring harness provides extra strength to prevent breakage even under extreme conditions. The on/off push button is recessed to avoid damage and prevent accidental shutoff. A specially designed filter attachment collar facilitates filter replacement and protects against accidental breakage.

Full facepiece models are available in silicone or rubber with Six-Strap or Tite-Seal® ratchet headgear. Silicone halfmask versions are available in small, medium, or large.



Molded wiring harness, recessed on/off button, and filter attachment collar prevent damage even under severe conditions.

Dependable lead-acid gel battery

The Willson PAPR is equipped with a fast-charging, lead-acid gel battery for up to six hours of continuous use. That's enough for a standard eight-hour shift — and all without the "time memory" complications inherent with competitive Ni-Cad batteries.

The battery charger features an automatic shut-off to prevent overcharge, a major cause of battery damage and reduction of battery life. Also available is a full function 10-unit battery charger, providing a 24% savings over buying 10 individual chargers.

All Willson PAPR's come complete with flow rate testers and plastic hose covers for easy decontamination. They are equipped with an economical R73 HEPA filter which is also used for egress on all 6000 Series continuous flow respirators. The versatile R73 filter may also be attached directly to a full facepiece for easy conversion to a negative air-purifying mode.

PAPR ORDERING INFORMATION

POWERED-AIR PURIFYING RESPIRATORS

[Suitable for use in asbestos concentrations less than 20 fibers/cc (100×PEL).]

Order #	Model #	Headgear	Facepiece Material	HEPA Filter	NIOSH/MSHA Approval #
14110188	6383S	Small halfmask	Silicone	R73	TC-21C-453
14110189	6383M	Med. halfmask	Silicone	R73	TC-21C-453
14110190	6383L	Large halfmask	Silicone	R73	TC-21C-453
14110182	6783	Six-Strap	Rubber	R73	TC-21C-452
14110183	S6783	Six-Strap	Silicone	R73	TC-21C-452
14110180	6683	Tite-Seal	Rubber	R73	TC-21C-452
14110181	S6683	Tite-Seal	Silicone	R73	TC-21C-452

PAPR REPLACEMENT PARTS AND ACCESSORIES

Order #	Model #	Description
14180054	R73	HEPA filter
14180049	R73B	HEPA filters (bulk)
14900624	RP40	6 volt battery
14900625	RP41	Blower
14900638	RP50	10 unit battery charger
14900628	RP42	Battery charger
14900634	RP47	Plastic breathing tube cover
14900635	RP48	Flow indicator tube
14900640	RP51	Battery charger cable
14900259	G871	Lens Cover, Full Facepiece

WARNING: Powered-air purifying respirators are not for use in an atmosphere immediately dangerous to life and health.

PERMISSIBLE

POWERED AIR PURIFYING RESPIRATOR FOR DUSTS, FUMES, AND MISTS, ASBESTOS, AND RADIONUCLIDES

United States Department of Labor
M S H A
Mine Safety and Health Administration

U.S. Department of Health and Human Services
Centers for Disease Control
N I O S H
National Institute for Occupational Safety and Health

MINE SAFETY AND HEALTH ADMINISTRATION
NATIONAL INSTITUTE FOR OCCUPATIONAL SAFETY AND HEALTH

APPROVAL NO. TC - 21C - 453

ISSUED TO
WILLSON SAFETY PRODUCTS
READING, PENNSYLVANIA, U. S. A.

LIMITATIONS

Approved for respiratory protection against dusts, fumes, and mists having a time weighted average less than 0.05 milligram per cubic meter, asbestos containing dusts and mists, and radionuclides.
Not for use in atmospheres containing less than 19.5 percent oxygen.
Not for use in atmospheres immediately dangerous to life or health.
This respirator shall be selected, fitted, used, and maintained in accordance with Mine Safety and Health Administration, Occupational Safety and Health Administration, and other applicable regulations.
Not evaluated as an ignition source in flammable or explosive atmospheres by MSHA/NIOSH.

CAUTION

In making renewals or repairs, parts identical with those furnished by the manufacturer under the pertinent approval shall be maintained.
Follow the manufacturer's instructions for changing filters.
Do not use this respirator system if the airflow is less than 4 cubic feet per minute.

MSHA - NIOSH Approval TC-21C-453

Issued to Willson Safety Products March 3, 1988 for dusts, fumes, and mists, asbestos, and radionuclides.
The approved assembly consists of the following Willson parts: (1) RP1, RP2, or RP3 Facepiece, (1) RP10 Exhalation Valve Assembly, (1) RP4 Suspension, (1) RP18 Plug, (1) RP19 Elbow, (1) RP45 Breathing Hose, (1) RP 41 Blower Assembly, (1) RP 40 Battery, (1) RP 44 Belt, and (1) R73 (TC - 21C - 371) Filter.

PERMISSIBLE

POWERED AIR PURIFYING RESPIRATOR FOR DUSTS, FUMES, AND MISTS, ASBESTOS, AND RADIONUCLIDES

United States Department of Labor
M S H A
Mine Safety and Health Administration

U.S. Department of Health and Human Services
Centers for Disease Control
N I O S H
National Institute for Occupational Safety and Health

MINE SAFETY AND HEALTH ADMINISTRATION
NATIONAL INSTITUTE FOR OCCUPATIONAL SAFETY AND HEALTH

APPROVAL NO. TC - 21C - 452

ISSUED TO
WILLSON SAFETY PRODUCTS
READING, PENNSYLVANIA, U. S. A.

LIMITATIONS

Approved for respiratory protection against dusts, fumes, and mists having a time weighted average less than 0.05 milligram per cubic meter, asbestos containing dusts and mists, and radionuclides.
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Not for use in atmospheres immediately dangerous to life or health.
This respirator shall be selected, fitted, used, and maintained in accordance with Mine Safety and Health Administration, Occupational Safety and Health Administration, and other applicable regulations.
Not evaluated as an ignition source in flammable or explosive atmospheres by MSHA/NIOSH.

CAUTION

In making renewals or repairs, parts identical with those furnished by the manufacturer under the pertinent approval shall be maintained.
Follow the manufacturer's instructions for changing filters.
Do not use this respirator system if the airflow is less than 4 cubic feet per minute.

MSHA - NIOSH Approval TC-21C-452

Issued to Willson Safety Products March 3, 1983 or dusts, fumes, and mists, asbestos, and radionuclides.
The approved assembly consists of the following Willson parts: (1) RP25, RP25S, RP26, or RP26S Fullfacepiece, (2) RP18 Plugs, (1) RP14 Exhalation Valve Assembly, (1) G377 Connector, (1) G882 Connector, (1) G758 Washer, (1) G764 Clamp, (1) RP45 Breathing Hose, (1) RP 41 Blower Assembly, (1) RP 40 Battery, (1) RP 44 Belt, and (1) R73 (TC - 21C - 371) Filter.

or

(1) RP25, RP25S, RP26, or RP26S Fullfacepiece, (1) RP18 Plug, (1) RP19 Elbow, (1) RP14 Exhalation Valve Assembly (1) RP33 End Plug, (1) G764 Clamp, (1) RP45 Breathing Hose, (1) RP 41 Blower Assembly, (1) RP 40 Battery (1) RP 44 Belt, and (1) R73 (TC - 21C - 371) Filter.

6000 Series: Full Facepiece Respirators

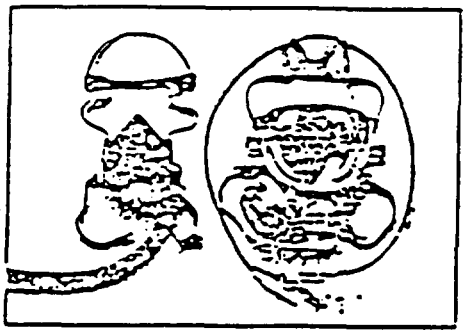
6000 Series full facepiece air-purifying respirators have reached a new level in comfort and wearability.

A wide sealing flange design, coupled with low-resistance filters and cartridges enhance wearer comfort and security. The durable, wide-vision, polycarbonate lens features a dual coating: scratch-resistant on the outside surface, anti-fog on the inside.

The smooth surface and clean design of this facepiece make it one of the easiest to decontaminate. Wearers can choose from rubber or silicone facepieces. They are available with Six-Strap or Willson's exclusive Tite-Seal® ratchet headgear for added comfort and convenience.

All full facepiece models utilize the basic T40 HEPA filter for protection in the contaminated environment. This filter is also used on halfmask air-purifying and pressure demand models for convenience and economy. Combination HEPA/Chemical cartridges are also available.

Willson's 6000 Series air-purifying respirators are easily converted to supplied-air or PAPR configurations with a few simple component changes. Full facepiece assemblies can also be converted to a single cartridge version using the economical R73 filter.



Willson air-purifying models convert quickly and easily to pressure demand, continuous flow or PAPR configurations.

6000 Series: Halfmask Respirators

High technology design makes Willson 6000 Series halfmasks one of the most comfortable, easy-to-breathe half facepieces available.

Larger valve ports are designed for lower inhalation resistance to make breathing easier than ever before. A relief port under the chin relieves perspiration build-up to ensure a secure seal. And a soft, rolled flange assures a comfortable fit.

This ultra-soft silicone halfmask is available in three sizes — small, medium, and large. Willson 6000 HEPA filters are designed with a central intake port for simple negative pressure fit checks. The smoothly sculpted silicone facepiece ensures convenient cleaning and maintenance. The nose area is designed to make these respirators comfortable even with safety eyewear.

As with our full facepiece models, dual cartridge halfmask respirators utilize two standard T40 HEPA filters. The 6240 single cartridge model utilizes an S40 filter and offers the comfort and convenience of the dual cartridge style at a 10% cost savings. Interchangeable components allow quick conversion to either single cartridge, dual cartridge or supplied air styles.

1200/1600/1700 Series Respirators

For those who prefer a rubber halfmask, Willson 1200 Series respirators have long been a standard of the industry. The facial seal design helps prevent contaminants from entering the facepiece. A small exhalation port makes positive pressure fit testing easy. Four-point and single-strap cradle headbands are replaceable. Uses Willson 1200 Series filters and cartridges only. Available in regular and small sizes. Also available in full face models with Six-Strap (1700 Series) or Tite-Seal® ratchet headgear (1600 Series).

APR ORDERING INFORMATION

FULL FACEPIECE AIR-PURIFYING RESPIRATORS

(Suitable for use in asbestos concentrations less than 10 fibers/cc (50×PEL). For use with appropriate high efficiency filters.)

Order #	Model #	Headgear	Facepiece Material
14140068	6400	Tite-Seal	Rubber
14140069	S6400	Tite-Seal	Silicone
14140070	6500	Six-Strap	Rubber
14140071	S6500	Six-Strap	Silicone
14140072	1600	Tite-Seal	Rubber
14140073	1700	Six-Strap	Rubber

HALFMASK AIR-PURIFYING RESPIRATORS

(Suitable for use in asbestos concentrations less than 2 fibers/cc (10×PEL). For use with appropriate high efficiency filter.)

Order #	Facepiece Model #	Description	Facepiece Material
14140059	6100S	Small, elastic headband	Silicone
14140060	6100M	Medium, elastic headband	Silicone
14140061	6100L	Large, elastic headband	Silicone
14140062	6200S	Small, elastic headband	Silicone
14140063	6200M	Medium, elastic headband	Silicone
14140064	6200L	Large, elastic headband	Silicone
14140002	1200	Regular, 4 elastic headbands	Rubber
14140019	1200R	Regular, 4 rubber headbands	Rubber
14140017	1200S	Small, 4 elastic headbands	Rubber
14140018	1200SR	Small, 4 rubber headbands	Rubber

FILTER ORDERING INFORMATION

Order #	Model #	Filter Description
14180059	T40	6000 Series HEPA
14180060	T40B	6000 Series HEPA (Bulk)
14190043	T41	6000 Series Organic vapor/HEPA
14190044	T44	6000 Series Ammonia/Methylamine/HEPA
14190045	T45	6000 Series Organic vapor/Acid gas/HEPA
14190046	T46	6000 Series Acid gas/Formaldehyde/HEPA
14180063	S40	6000 Series Single cartridge HEPA
14180033	R12	1200/1600/1700 Series HEPA
14180047	R12B	1200/1600/1700 Series HEPA (Bulk)

NOTE: All 6000 Series filters are interchangeable on any 6000 Series facepiece. Additional filter types are available for both 6000 Series and 1200 Series air-purifying respirators. Probed respirators are also available for fit testing. See price list for details.

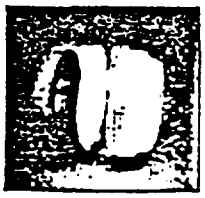
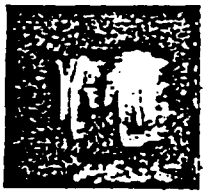
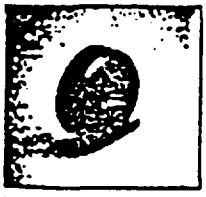
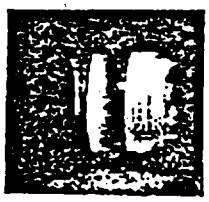
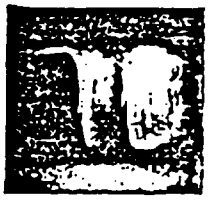
WARNING: Air-purifying respirators are not to be used in an atmosphere immediately dangerous to life and health.

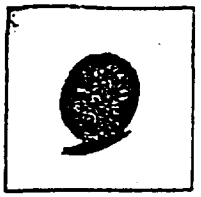
Designed for optimum protection with minimum breathing resistance.

Willson offers a full line of air-purifying cartridges and filters. A unique positive-locking design connects the cartridge with a simple one-quarter turn, which is accompanied by an audible click that signifies secure attachment.

Dual Cartridges

6000 Series dual cartridges and filters offer low breathing resistance and excellent protection in a wide variety of work environments.

	Hazard	Halfmask	Full Face
 RP21 T10 RP22	Dusts/Mists	6110 S,M,L TC-21C-376	6410/6510 TC-21C-383
 RP21 T20 RP22	Dusts/Fumes/Mists/ Radon Daughters	6120 S,M,L TC-21C-394	6420/6520 TC-21C-395
 T40	Dusts/Fumes/Mists/Asbestos and Radionuclides (HEPA)	6140 S,M,L TC-21C-377	6440/6540 TC-21C-384
T01	Organic Vapors	6101 S,M,L TC-23C-737	6401/6501 TC-23C-743
 T01 T10 RP22	Organic Vapors/Dusts/Mists/ Mists of Paint, Lacquer, Enamel/Pesticides. Not for fumigation or isocyanate-containing paints	6111 S,M,L TC-23C-751	6411/6511 TC-23C-747
 T01 T20 RP22	Pesticides/Organic Vapors/ Dusts/Fumes/Mists/Mists of Paint, Lacquer, Enamel/Radon Daughters. Not for fumigation or isocyanate-containing paints	6121 S,M,L TC-23C-791	6421/6521 TC-23C-792

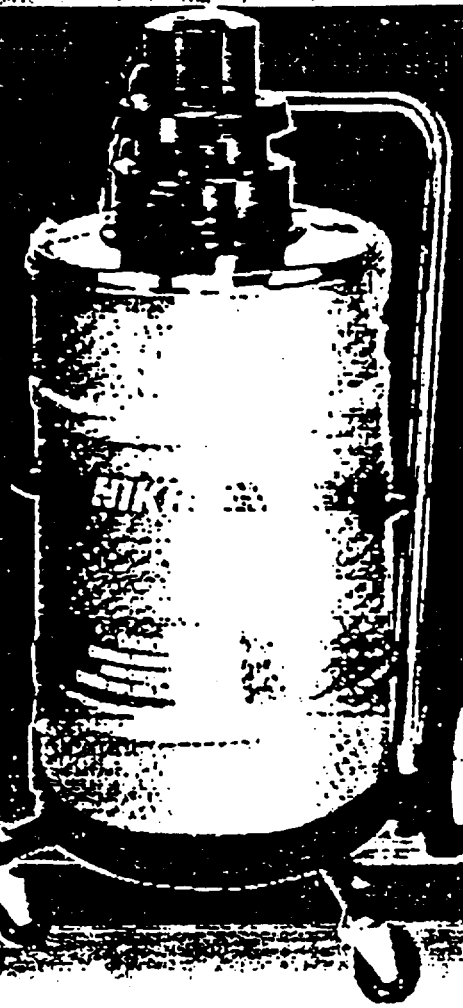
	Hazard	Halfmask	Full Face
T41	Organic Vapors/Dusts/ Fumes/Mists/Asbestos and Radionuclides (HEPA)	6141 S,M,L TC-23C-759	6441/6541 TC-23C-760
 T04	Ammonia/Methylamine	6104 S,M,L TC-23C-735	6404/6504 TC-23C-744
T04 T10 RP22	Ammonia/Methylamine/ Dusts/Mists	6114 S,M,L TC-23C-752	6414/6514 TC-23C-750
T04 T20 RP22	Ammonia/Methylamine/ Dusts/Fumes/Mists/ Radon Daughters	6124 S,M,L TC-23C-785	6424/6524 TC-23C-786
T44	Ammonia/Methylamine/ Dusts/Fumes/Mists/Asbestos and Radionuclides (HEPA)	6144 S,M,L TC-23C-761	6444/6544 TC-23C-762
T05	Organic Vapors/Acid Gases (Chlorine, Hydrogen Chloride, Sulfur Dioxide, Chlorine Dioxide)	6105 S,M,L TC-23C-736	6405/6505 TC-23C-745
T05 T10 RP22	Organic Vapors/Acid Gases (Chlorine, Hydrogen Chloride, Sulfur Dioxide, Chlorine Dioxide)/Dusts/Mists	6115 S,M,L TC-23C-753	6415/6515 TC-23C-748

ARAMSCO · MIDWEST
906 GRACE STREET, ELGIN, IL 60120
1-800-767-9931 FAX 708-741-1218

NIKRO

DIRECT LOADING ASBESTOS VACUUMS

"The Topless Wet/Dry Vacuum"



Features:

- Direct loading allowing materials to load directly into 6 mil. bags.
- Wet/Dry Pick-up without using adapters and 1/2 barrels
- H.E.P.A. Filtration 99.99% @ 0.3 microns
- All prefilters washable and reusable
- Available in 15 or 20 gallon rugged, dent proof - rust proof polyethylene tanks (5 year warranty)
- Non treaded wheels for easy cleaning
- 1-1/4 or 2 H.P. motors available
- Non-tapering tank design for easy removal of full bags

For A Safer Environment

DIRECT LOADING ASBESTOS VACUUMS

Finally . . . 15 and 20 gallon asbestos vacuums that are truly designed with the abatement contractor in mind.

These vacuums allow you to dump directly into 6 mil bags, eliminating extra handling and transferring of materials. And as far as converting these vacuums from dry to wet pick-up, all you have to do is turn on the vacuum because this machine is designed to pick-up both wet and dry materials, with no conversion at all. This vacuum is compact and simple to use, and maintenance costs are lower than most vacuums . . . all prefilters are washable and reusable.

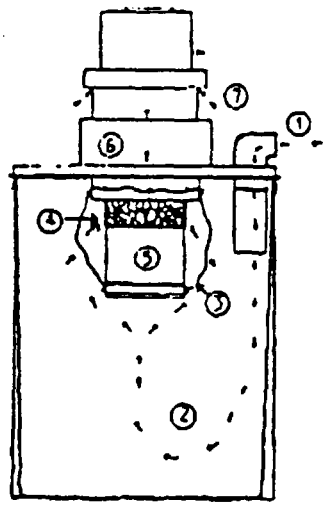
The "Topless" series vacuums feature a H.E.P.A. (High Efficiency Particulate Air) filter that is 99.99% efficient at 0.3 microns (D.O.P. Method) - meets or exceeds O.S.H.A. requirements for cleaning the air of asbestos and other toxic dusts. These NIKRO vacuums have a three stage filtration system: Washable/Reusable-Water Repelling/Non-Clinging Dacron bag, Washable/Reusable Polyester impact filter and a H.E.P.A. filter which is positioned outside of the tank, in front of the motor . . . protecting component parts from contamination.

These vacuums also feature non-tapering polyethylene tanks (5 year warranty) for easy removal of full bags, and a durable wheel base (wheels are mounted into base not tank) providing greater strength and stability for heavy-duty handling and transporting.

You asked for it, here it is!

Whatever the application . . . turn to NIKRO for a safer environment.

OPERATION



1) Debris enters through the wide mouth intake and into the vacuum tank.
2) Debris is loaded directly into 6 mil. bags.
3) Water Repelling/Non-Clinging Dacron Filter Bag sheds water and soot protecting the H.E.P.A. Filter from moisture and dust particles.
4) Polyester impact filter traps particles before reaching the H.E.P.A. Filter.
5) Water shut-off cuts off vacuum automatically when tank is full.
6) H.E.P.A. Filter rated at 99.99% @ 0.3 microns is located outside of the vacuum tank, prior to motor, protecting component parts from contamination.
7) Clean air is exhausted allowing for a safer environment.

SPECIFICATIONS

Model #	Static Lift	C.F.M.	Cord Length	No. of Filters	Tank Size	Wet/Dry	Dry Cap.	Wet Cap.	Cart [illegible]	Horse Power	[illegible]	H.E.P.A. (High [illegible]ciency [illegible]lter [illegible]s the [illegible] &
DL01588	88"	95	30'	3	15 Gal.	Yes	15 Gal.	15 Gal.	Yes	1.25	[illegible]	[illegible]
DL02088	88"	95	30'	3	20 Gal.	Yes	20 Gal.	[illegible]	Yes	1.25	[illegible]	[illegible]
DL15110	110"	115	30'	3	15 Gal.	Yes	15 Gal.	15 Gal.	Yes	[illegible]	[illegible]	[illegible]
DL20110	110"	115	30'	3	20 Gal.	Yes	20 Gal.	20 Gal.	Yes	2	[illegible]	[illegible]

NIKRO

INDUSTRIES, INC.

638 N. Iowa, Villa Park, Illinois 60181

Telephone: 708-530-0558 • FAX 708-530-0740

INDUSTRIES, INC. • 638 N. Iowa Street, Villa Park, Illinois 60181 • (708) 530-0558

April, 1991

To Whom It May Concern:

This is to advise you that all our Nikro H.E.P.A. filtered vacuums are built in accordance with and meet the ANSI Z9.2 Standards.

All of our H.E.P.A. filters are manufactured and D.O.P. tested in accordance with MIL-STD 282 and UL586, and are registered and labeled on each individual unit by the manufacturer. All the filters we use meet, and in most cases, exceed the minimum standard of 99.99% efficiency for 0.3 micrometer particles.

Sincerely,

Roland G. Nicholson
President

ACC AMERICAN COATINGS CORPORATION
SERVING THE ASBESTOS ABATEMENT INDUSTRY SINCE 1979

8129 North Austin Avenue
Morton Grove, Illinois 60053
800) 323-7580
(708) 967-8700

1500 NW 62nd St • #503
Ft. Lauderdale, FL 33309
(800) 533-0151
(305) 772-8188

22P POWERLOCK

"LOCK DOWN"

22P "POWERLOCK" is a unique emulsion which meets all industry standards for asbestos encapsulants. POWERLOCK'S specialized latex composition has been developed to significantly reduce labor expenses by adhering to the surface during the first application.

POWERLOCK'S easy one step application is used for "locking down" all surfaces in the work area. inlcuidng debris. following the removal of asbestos.

As a lock down encapsulant. POWERLOCK's full-strength formula provides the final measure of protection by sealing any treated fibers which may have remained within the abatement area. Additionally. upon curing. POWERLOCK forms a tough. resilient film over the substrate which is compatible with conventional replacement products.

Although the standard finish is translucent. POWERLOCK is available in tints when requested.

PRODUCT DATA & TEST RESULTS

Product Classification	"Lock Down Encapsultant"
Viscosity. cps	20-40
pH	4.0
Specific Gravity	1.05
Weight per Gallon. pounds	8.75
Reactivity Data	Stable
Incompatibility	Strong Oxidizers
Freezing Point	32°F
Storage	40°F - 100°F
Odor:	
Wet	Mild Latex
Dry	None
Color:	
Wet	Milky White
Dry	Translucent
(Tinting Available)	

FLAMMABILITY INFORMATION

OSHA	IIIB
DOT	Not Regulated
Flash Point (TCC)	212°F
Flame Spread Index (ASTM E84-86)	0
Smoke Developed	10
Fire Rating (ASTM E84-86)	A
(Coverage Rate for Testing 35-40 ft^2/gal)	
Flame Spread Index (ASTM E162)	17
Flame Spread Classificaton (ASTM E162)	A
(Conducted on a friable matrix a 7-12 ft^2/gal)	

Tested with Retroguard • RG®

SMOKE GENERATION DATA

Opt. Density Flame Mode	3
Toxic Gas Release:	
CO. percent by Volume	.03
HCl. ppm	Less than 1
HCN. ppm	Less than 2
No + No2	Less than 5
(Conducted on friable matrix a >20 ft^2/gal)	

EQUIPMENT SPECIFICATIONS

Electric airless spray pump
Hose size ¼" - ½" Inner Diameter
Standard point gun with .011 to .019 tip opening
Apply at low pressure to avoid rebounding

LOCK DOWN PROCEDURE

Approximate Application Rate 80 - 150 ft^2/gal

APPLICATION SUGGESTIONS

Follow all Federal. State and Local regulations governing the safe handling of asbestos-containing materials.

Product should be used full-strength. Excessive dilution reduces the product's efficiency.

Trial application is recommended to determine the most effecitve coverage rate.

Wear safety non-skid footwear. Avoid hot surfaces.

Clean equipment thoroughly following each usage.

1. Make sure all visible asbestos materials have been removed per specification requirements.
2. Set airless spray equipment to lowest possible pressure still capable of spraying material.
3. Using a consistent spraying motion. apply POWERLOCK to all surfaces in the work area. including debris. Avoid hot surfaces.
4. One misting should be sufficient. Allow adequate drying time. dependent upon field conditions. prior to installing replacement product.

DISTRIBUTED BY

MATERIAL SAFETY DATA SHEET
FOR COATINGS, RESINS, AND RELATED MATERIALS
REPLACES NPCA 1-82

MANUFACTURERED FOR

American Coatings Corporation
Plant Road
Nitro, WV 25143

EMERGENCY TELEPHONE

(304) 755-7889

DATE OF PREPARATION

August 1, 1989

SECTION I - PRODUCT INFORMATION

PRODUCT NUMBER: ACC 22-P White

PRODUCT NAME: Asbestos Encapsulant Lock Down/Penetrant

PRODUCT CLASS: Copolymer Latex Coating - Water Dispersion

TRANSPORTATION INFORMATION: Shipping Class 55, Paint (No special labels required.)

SECTION II - HAZARDOUS INGREDIENTS

INGREDIENT	PERCENT	OCCUPATIONAL EXPOSURE LIMIT TLV	PEL	VAPOR PRESSURE

This MSDS is developed to satisfy the requirements of the OSHA Hazard Communications Standard 29 CFR 1910.1200. The components of this mixture are not considered 'Hazardous' by this OSHA Standard and are not designated carcinogenic by the National Toxicology Program (NTP) or the International Agency for Research or Cancer (IARC). Additionally, the specific chemical identities of this mixture are considered to be trade secrets by American Coatings Corporation and will be made available to health professionals only in accordance with procedures established in the previously mentioned Standard.

SECTION III - PHYSICAL DATA

BOILING RANGE: 212° F

VAPOR DENSITY: Lighter than air

EVAPORATION RATE: Slower than ether

VOLATILE VOLUME: 68% - 78%

WT/GAL: 10.2 lbs

SPECIFIC GRAVITY: 1.24 pH: 7-8

SOLUBILITY IN WATER: Appreciable

VISCOSITY: Approx. 80-160 centipoises

DECOMPOSITION TEMPERATURE: Approx. 240° F (115° C)

FREEZING POINT: 32° F (0° C)

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLAMMABILITY CLASSIFICATION:
OSHA - IIIB DOT - Not Regulated FLASH POINT - No flash to boiling 212° F (TCC).

LEL - Not available

EXTINGUISHING MEDIA:
X Foam X Alcohol Foam X CO2 X Dry Chemical X Water Fog Other

UNUSUAL FIRE AND EXPLOSION HAZARDS: None known

SPECIAL FIREFIGHTING PROCEDURE: Product will not burn until water has evaporated. For dried film or residual solids, full protective equipment is recommended, including self-contained breathing apparatus.

SECTION V - HEALTH HAZARDS

EFFECTS OF OVEREXPOSURE: A TLV for this mixture has not been established.

Eye contact may cause moderate irritation. Prolonged skin contact may cause slight irritation. Exposure to concentrated vapors may cause some individuals to experience headaches or dizziness. Ingestion of the liquid may irritate the mucous membranes and gastrointestinal tract and may cause vomiting.

If headaches or dizziness are experienced by an individual, the product handling procedures and workplace ventilation should be examined.

MEDICAL CONDITIONS PRONE TO AGGRAVATION BY EXPOSURE: No available information.

PRIMARY ROUTES OF ENTRY: Dermal, Inhalation

EMERGENCY AND FIRST AID PROCEDURE: Skin - wash with soap and water. Eyes - flush with clean water at least 15 minutes. If irritation persists, consult physician. Inhalation - remove to fresh air. If breathing is difficult, administer oxygen. If irritation persists, consult physician. Ingestion - give two glasses of water, induce vomiting, consult physician or poison control center. Never give anything by mouth to an unconscious person.

SECTION VI - REACTIVITY DATA

STABILITY: Stable HAZARDOUS POLYMERIZATION: Will not occur.

HAZARDOUS DECOMPOSITION PRODUCTS: Thermal decomposition will yield CO, CO2, AND HCl.

CONDITIONS TO AVOID: None known.

INCOMPATIBILITY (Materials to Avoid):
Materials incompatible with water and strong oxidizers.

SECTION VII - SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED: Major spills should be collected for disposal. Minor spills may be flushed to sewer if regulations permit. Before drying, product may be washed away with water; after drying, remove with a paint scraper or strong solvent.

WASTE DISPOSAL METHOD: In accordance with all applicable regulations. Review hazard section of this sheet before attempting clean-up. Empty containers are non-hazardous under RCRA as industrial waste.

SECTION VIII - SAFE HANDLING AND USE INFORMATION

RESPIRATORY PROTECTION: In restricted ventilation areas, or applications where mists or spray may be generated, avoid inhalation of airborne particulates by using an approved respirator with organic vapor cartridge with prefilter for mist or dust.

VENTILATION: General (mechanical) room ventilation is expected to be satisfactory. Local exhausts should be considered for coating operations.

PROTECTIVE GLOVES: Impervious gloves.

EYE PROTECTION: Goggles, faceshields, or other eyewear to protect from splash. As a general rule, contact lens should not be worn when working with chemicals.

OTHER PROTECTIVE EQUIPMENT: None.

HYGIENIC PRACTICES: Thoroughly cleanse hands after handling. Launder contaminated clothing before reuse.

SECTION IX - SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING: Avoid breathing vapors. Avoid application to hot surfaces, as vapors may be irritating. Keep container closed. Use with adequate ventilation. Store indoors at temperatures of 45°F - 90°F. Do not store in contact with iron, aluminum, zinc, copper, or other alloys.

OTHER PRECAUTIONS: For industrial/professional use only. Not intended for retail sale or use by individual consumers. Do not reuse container for potables or edibles.

REVISION DATE: 2/28/90

HEALTH HAZARD - 1
FIRE HAZARD - 0
REACTIVITY - 0

MATERIAL SAFETY DATA SHEET U.S. DEPARTMENT OF LABOR
COMPLIES WITH USDL SAFETY AND HEALTH REGULATIONS, (29 CFR 1910.1200)

****

SECTION I: MANUFACTURED FOR

ABATEMENT TECHNOLOGIES, INC.
3305 BRECKINRIDGE BLVD. SUITE 118
DULUTH, GA 30136

EMERGENCIES: (404) 925-2761

PRODUCT IDENTIFICATION:

AS205
SUPER WATER WETTER
NONIONIC SURFACTANT
CODE #:6459

MGR: 10/29/85-108

****

SECTION II:

HAZARDOUS INGREDIENTS

SEE NOTE

NOTE: THIS PRODUCT CONTAINS NO HAZARDOUS COMPONENTS AS DEFINED BY THE OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION REGULATIONS, (29 CFR SECTION 1910.1200).

THIS PRODUCT IS NOT A CARCINOGEN OR POTENTIAL CARCINOGEN AS IDENTIFIED BY OSHA, THE NTP, OR THE IARC MONOGRAPHS.

****

SECTION III: PHYSICAL DATA

BOILING POINT: 210 DEGREES FAHRENHEIT
VAPOR PRESSURE: UNKNOWN
VAPOR DENSITY, (AIR=1): UNKNOWN
SOLUBILITY IN WATER: COMPLETE
SPECIFIC GRAVITY, (H20=1): 1.006
PERCENT VOLATILE BY VOLUME: 85%
EVAPORATION RATE, (WATER=1): ,1
pH: 7.0
APPEARANCE AND ODOR: CLEAR, VISCOUS LIGHT-BLUE LIQUID

****

SECTION IV: FIRE AND EXPLOSION DATA

FLASH POINT, (METHOD USED): NO FLASH @ BOIL, (C.C.)
FLAMMABLE LIMITS: NOT APPLICABLE
EXTINGUISHING MEDIA: 1) DRY CHEMICAL; 2) FOAM; 3) CO2
SPECIAL FIREFIGHTING PROCEDURES: NONE
UNUSUAL FIRE AND EXPLOSION HAZARDS: NONE

****

SECTION V: HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE: HAS NOT BEEN DETERMINED.
EFFECTS OF OVEREXPOSURE: DIRECT EYE CONTACT WILL RESULT IN IRRITATION.
POSSIBLE SKIN IRRITANT WITH PROLONGED USE.
EMERGENCY FIRST AID PROCEDURES:
SKIN: FLUSH WITH WATER.
EYES: FLUSH WITH WATER, IF IRRITATION PERSISTS, CALL PHYSICIAN.
INGESTION: DRINK LARGE VOLUMES OF MILK OR OTHER LIQUID, CALL PHYSICIAN IMMEDIATELY.

****

SECTION VI: REACTIVITY DATA

STABILITY DATA: STABLE
INCOMPATIBILITY: NONE
HAZARDOUS DECOMPOSITION PRODUCTS: NONE
HAZARDOUS POLYMERIZATION: WILL NOT OCCUR

****

SECTION VII: SPILL OR LEAK PROCEDURES

SMALL SPILLS: WIPE UP PRODUCT, RINSE SOILED AREA WITH WATER DOWN THE DRAIN.
LARGE SPILLS: STOP LEAK AT THE SOURCE AND COLLECT INTO A SUITABLE CONTAINER, THEN TREAT AS A SMALL SPILL.

FOLLOW STATE AND LOCAL REGULATIONS FOR DISPOSAL OF LARGE NON-RECLAIMABLE SPILLS.

****

SECTION VIII: SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION: NONE REQUIRED
VENTILATION: MECHANICAL, (GENERAL)
PROTECTIVE GLOVES: FOR PROLONGED USE.
EYE PROTECTION: SAFETY GLASSES
OTHER PROTECTIVE EQUIPMENT: NONE REQUIRED

****

SECTION IX: SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE:
ALWAYS STORE UNUSED PORTION IN ORIGINAL CONTAINER WITH CAP SECURE. AVOID TEMPERATURE EXTREMES.
OTHER PRECAUTIONS: AS WITH ALL CHEMICALS, USE WITH DUE CARE ACCORDING TO LABEL INSTRUCTIONS AND PRECAUTIONS.

****

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THRESHOLD LIMIT VALUE: HAS NOT BEEN DETERMINED.
EFFECTS OF OVEREXPOSURE: DIRECT EYE CONTACT WILL RESULT IN IRRITATION. POSSIBLE SKIN IRRITANT WITH PROLONGED USE.
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OTHER PRECAUTIONS: AS WITH ALL CHEMICALS, USE WITH DUE CARE ACCORDING TO LABEL INSTRUCTIONS AND PRECAUTIONS.

MATERIAL SAFETY DATA SHEET

Sensidyne, Inc.
12345 Starkey Road, Suite E
Largo, Florida 33543
813/530-3602 Telex 756223

MSDS # 0501

Revised: 10/86

PART I, Material Identification

Material Name: AIR FLOW INDICATOR TUBES
Chemical Name & Synonyms: Smoke tubes.

Chemical Family: Metal Chloride
Formula: $SnCl_4$

PART II, Ingredients & Hazards

	%	TLV
Stannic chloride reacts with ambient humidity to liberate a white smoke consisting of HCl and tin compounds.	ca 100 (combined)	5 ppm ceiling for HCl 2 mg/M^3 for tin compounds

PART III, Physical Data

Boiling Point, 1 Atm, °F (°C): -121 (-85)*
Vapor Pressure, mm Hg: 41.6 @ 20°C*
Solubility in Water: 37% by weight @ rt*

Specific Gravity: N/A
Evaporation Rate: N/A

*Physical data for HCl

Appearance & Odor: Hydrogen chloride is a colorless gas with a pungent odor. It fumes strongly in moist air forming white hydrochloric acid fume. The emitted tin compound has a strong irritating odor.

PART IV, Fire & Explosion Data

Flash Point & Method	Auto Ingition Temp. °C	Flammability Limits In Air, Vol. %	Lower	Upper
none	none		none	none

Extinguishing Media:

Suitable for surrounding fire.

Special Firefighting Procedures:

Firefighters should wear SCBA units to protect against possible toxic decomposition products.

Unusual Fire & Explosion Hazards:

Fires encompassing the tubes will emit toxic fumes of chlorides.

PART V, Health Hazard Information

Applicable TLV's:

HCl = 5ppm ceiling (1986-87 Book)

Tin compounds = $2mg/M^3$ as tin (1986-87 Book)

Effects of Overexposure:

Hydrogen chloride gas (and the acid fume) is corrosive to all human tissue. Inhalation of gas concentrations moderately above the TLV can damage the teeth and irritate nasal passages. Inhalation of higher concentrations (above 50ppm) for a short period of time can cause choking and coughing, and produce severe irritation and damage to the mucous membranes of the upper respiratory tract. The NIOSH - recommended IDLH* level is 100ppm. HCl can cause severe irritation and tissue burns. (Anhydrous HCl is more dangerous than the acid mist, since it has an additional dehydrating effect on tissues.) If deeply inhaled, pulmonary edema may occur.

The emitted tin compound is also an irritant to eyes, skin and mucous membranes, due to its acidity.

Emergency & First Aid Procedure:

Eyes: Flush immediately with running water for at least 15 minutes, including under eyelids. Contact a physician!

Skin: Flush affected areas with running water. Get medical help in case of large area contact or if irritation persists.

Inhalation: Remove victim to fresh air! Restore and/or support breathing, as necessary. Provide oxygen therapy for persistent coughing or if breathing is difficult. Keep victim warm and at rest. Get medical help.

*IDLH - immediately dangerous to life and health.

PART VI, Reactivity Information

Stability:

HCl is a stable compound. It does not undergo hazardous polymerization; however, HCl can catalyze some polymerizations of other compounds.

Conditions to Avoid:

Incompatable materials include alkalines, metal oxides and metals.

Hazardous Decomposition Products:

When heated to decomposition, the smoke tubes will emit chloride fume.

PART VII, Spill, Leak & Disposal Procedures

Spills Procedure:

Does not apply.

Disposal Procedure:

Soak used tubes in water and neutralize with sodium carbonate or equivalent alkaline substance. Dispose tubes via landfill. Consult local authorities to assure compliance with local, state and federal regulations.

PART VIII, Special Protection Information

Protective Equipment:

No respiratory protection is required during normal use. Local ventilation is adequate Safety glasses with side shields should be worn to minimize eye contact. Safety gloves are not necessary for normal use, although skin contact with HCl and the broken glass tubes should be avoided.

PART IX, Special Precautions & Comments

Handling & Storage:

Store in the original container in a cool dry place. Protect against light, heat and physical damage.

Other Precautions:

Avoid eye and skin contact with smoke. Do not breath smoke. Use only as directed. Use in well ventilated areas. Wash hands prior to eating, drinking, smoking or applying cosmetics Avoid cuts from broken ends of glass tubes.

PROPRIETARY INFORMATION AND DISCLAIMER

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Material Safety Data Sheet

May be used to comply with OSHA's Hazard Communication Standard, 29 CFR 1910.1200. Standard must be consulted for specific requirements.

NASHUA CORPORATION

44 FRANKLIN ST., NASHUA, NH 03061

MATERIAL SAFETY DATA SHEET

4 / 2 0

IDENTITY (As Used on Label and List)
357 SA Spray Adhesive

Note: Blank spaces are not permitted. If any item is not applicable, or no information is available, the space must be marked to indicate that.

Section I

Manufacturer's Name
Nashua Tape Products

Emergency Telephone Number
1-(603)-880-5555

Address (Number, Street, City, State, and ZIP Code)
2600 Seventh Avenue

Telephone Number for Information
(518) 271-2200

Watervliet, New York 12189

Date Prepared
4/3/90

Printed Name(s) Preparer
Rick Lawton

Manufacturing Div.
Tape Products

Section II — Components and Hazardous Information

Components (Specific Chemical Identity; Common Name(s))	PERCENT	OSHA PEL	ACGIH TLV	CAS No.
Hexane	30-40	50 ppm	50 ppm	110-54-3
Acetone*	10-20	750 ppm	750 ppm	67-64-1
Propane/Isobutane	20-30	860 ppm	860 ppm	68476-86-6

* Subject to the reporting requirements of SARA Title III Act of 1986 and 40 CFR Part 372

Section III — Physical/Chemical Characteristics

Boiling Point (°F) Propellant	-43 °F	Specific Gravity (H_2O = 1)	0.725
Vapor Pressure (mm Hg.) @20 °C	60 psi	% Volatile by Volume	80-85
Vapor Density (AIR = 1)	1+	Evaporation Rate (Butyl Acetate = 1)	5+

Solubility in Water
Negligible

Appearance and Odor
White liquid, characteristic odor

Section IV — Fire and Explosion Hazard Data

Flash Point (Method Used) Propellant -156 °F (c.c.)	Flammable Limits	LEL 1.0	UEL 25

Extinguishing Media
Carbon dioxide, foam, dry chemical, water fog

Special Fire Fighting Procedures
Eliminate possible sources of ignition, wear self-contained breathing apparatus.

Unusual Fire and Explosion Hazards
High temperatures may cause cans to burst. Keep away from heat and flame.

Section V — Reactivity Data

Stability	Unstable		Conditions to Avoid
	Stable	X	NA

Incompatability (Materials to Avoid)
Oxidizers

Hazardous Decomposition or Byproducts
Carbon dioxide, CO, typical organic decomposition products

Hazardous Polymerization	May Occur		Conditions to Avoid
	Will Not Occur	X	NA

Section VI — Health Hazard Data

Routes of Entry: Inhalation? yes Skin? yes, eyes Ingestion? not likely

Health Hazards (Acute and Chronic)
May cause eye, nose, and throat irritation, narcosis, headache and slight nausea. Extended exposure may affect central nervous system.

Carcinogenicity: NTP? No IARC Monographs? No OSHA Regulated? No

Signs and Symptoms of Exposure
Dizziness, headache, loss of consciousness

Medical Conditions Generally Aggravated by Exposure none known

Emergency and First Aid Procedures
In all cases remove source of exposure. Inhalation: remove to fresh air, administer oxygen. Eyes: Wash with water for 15 minutes. Skin: wash with soap and water. Ingestion: not likely. In all cases get medical attention.

Section VII — Precautions for Safe Handling and Use

Steps to be Taken in Case Material is Released or Spilled
Remove sources of ignition. Ventilate area. Soak up liquid in absorbent.

Waste Disposal Method
Per State, local, and Federal regulation.

Precautions to Be Taken in Handling and Storing
Keep away from heat, spark and open flame.

Other Precautions
None

Section VIII — Control Measures

Respiratory Protection (Specify Type)
NIOSH approved self-contained, if TLV is exceeded

Ventilation	Local Exhaust	Special
	sufficient	NA
	Mechanical (General)	Other
	If necessary to keep below TLV	NA

Protective Gloves	Eye Protection
impervious, compatible	chemical goggles

Other Protective Clothing or Equipment
suitable to protect bare skin and clothing.

Work/Hygienic Practices
General good housekeeping practices, protective clothing.

J.L. CLARK Tube Division

a CLARCOR company

MEMO TO: Jim Klotz

DATE: December 12, 1995

CC: Al Moore

FROM: Linn Vehslage

REFERENCE: Holian Asbestos

SUBJECT : Final Job Submittal

Jim, here is the final paperwork from the asbestos removal project on the drying ovens over line 4a. With this completed, the north penthouse through visual inspection only, should be asbestos free.

ASBESTOS AIR ANALYSIS

Comments

SUBMITTED BY

ASBESTOS REMOV[illegible]

[illegible] CORP.

7501 MEYER ROAD

SPRING GROVE, ILL 60081

(815) 675-66[illegible]

J L CLARK
2300 WISCONSIN AVENUE
DOWNERS GROVE, ILLINOIS

TABLE OF CONTENTS

ABATEMENT PHOTOS

WASTE SHIPMENT RECORD

CERTIFICATE OF INSURANCE

AIR MONITORING

BULK SAMPLES

DAILY LOGS

EMPLOYEE LICENSES AND PHYSICALS

Houston, Gregory	428-15-7385
Rabelhofer, Michael	347-58-8296
Rabelhofer, William	320-74-2931

J L CLARK
2300 WISCONSIN AVENUE
DOWNERS GROVE, ILLINOIS

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CERTIFICATE OF ACHIEVEMENT

Construction and General Laborers
District Council of Chicago and
Vicinity Training Trust Fund
4N250 OLD GARY AVE
GLOVERDALE, ILLINOIS 60103
(708)653-0006

No. S 676 R

MAILING ADDRESS
CHICAGO LABORERS TRAINING FUND
P.O. BOX 88658
CAROL STREAM, ILLINOIS 60188

This is to certify that GREG HOUSTON has successfully completed the ASBESTOS ABATEMENT SUPERVISORS' REFRESHER TRAINING course and passed the examination with a minimum score of at least 70%. Training was in accordance with TSCA Title II . This course is EPA, Illinois Department of Public Health and Indiana Department of Environmental Management accredited.

COURSE DATE 03/03/95 THRU 03/03/95
EXAM DATE 03/03/95
EXPIRATION DATE 03/03/96

ANTHONY SOLANO
Administrator

DOCUMENTATION: MEDICAL FITNESS FOR ASBESTOS REMOVAL AND RESPIRATOR USE

PATIENT NAME: Greg. L. Houston DATE: 1/21/95

DATE OF BIRTH: 10/7/59 AGE: 35.

SOCIAL SECURITY NUMBER: 428 15 7385

FITNESS CRITERIA

1. This is to certify, in accordance with the OSHA Asbestos Standard, 29 CFR 1926.58 (M) (1) (2) (3) and (4) and 29 CFR 1910.1001, I have examined the above mentioned individual;

2. Based on my findings, I have determined this individual may use respiratory device while performing his/her required employment services;

3. The results of my examination have not detected a medical condition which would place the employee at an increased risk of material health impairment from exposure to asbestos;

4. In accordance with OShA requirement, I have informed the above named individual of the results of his/her medical examination and of any medical condition that may result from his/her exposure to asbestos, and

5. I have informed the above named individual of the health risks involved in smoking, of synergistic relationship between cigarette smoking and asbestos exposure in producing lung cancer, and that cessation of smoking will reduce the risk of lung cancer.

PHYSICIAN'S APPROVAL:

It is my medical opinion that the above-named individual is medically fit to engage in asbestos removal and wear respiratory protective equipment as required by the Illinois Department of Public Health (Asbestos Abatement Act Rules and Regulations, Section 855.60) and OSHA 29CFR 1926.58 M (1) (2) (3) (4) and OSHA 29 CFR 1910.1001.

Physician's Signature T. L. Panemunde MD

Date 1/21/95

BASIC EXAMINATION FOR ASBESTOS WORKERS

COMPANY: Holian Asbestos DATE: 1/21/95

APPLICANT NAME: Greg L. Houston SS#: 428 15 7385

ADDRESS: 5701 Mill St. TELEPHONE: 815 678 4183

Richmond 60071 DATE OF BIRTH: 10-7-59

MEDICATIONS: None KNOWN DRUG ALLERGIES: None

BROKEN BONES: None SURGERY: None

DOES PATIENT WEAR GLASSES OR CONTACTS: No

DOES PATIENT HAVE KNOWN PHOBIAS REGARDING HEIGHTS OR CONFINED SPACES: No

HAS PATIENT EVER HAD PROBLEMS WITH EARS: No

CARDIO-PULMONARY EXAMINATION

HEIGHT: 5' 10" WEIGHT: 194 lb

BLOOD PRESSURE: SYSTOLIC 135 DIASTOLIC 70 PULSE 68/L

HEART: MURMURS None RATE 68

RHYTHM Reg ENLARGEMENT None

LUNGS: Resp. 12/m. Movements equal full. P.N. resonant. B.S. vesicular No adv sounds.

PULMONARY FUNCTION: ~~(Copy Attached)~~ ✓

WITHIN NORMAL LIMITS _____ OUTSIDE NORMAL LIMITS _____

5000
4866

PA CHEST X-RAY: (Copy Attached)

WITHIN NORMAL LIMITS _____ OUTSIDE NORMAL LIMITS _____

RECOMMENDATIONS: Healthy

It is my opinion that the above named patient is ___ ~~is not~~ ___ qualified to wear a respirator in the performance of his/her job:

Physical Examination Record

NAME (Last) (First) (Initial)	JOB CLASSIFICATION	SEX	AGE	DATE
HOUSTON GREG C		M	35	1/21/95

DIVISION OR PLANT	DEPARTMENT	LOCATION

HISTORY: Have you had or are you under treatment for any of the following: (Check every item or write "Don't Know").

ITEM	YES	NO	ITEM	YES	NO	ITEM	YES	NO
HEAD, BACK OR KNEE INJURIES	✓	✓	TUBERCULOSIS		X	DIABETES		X
ASTHMA OR SHORTNESS OF BREATH		X	RHEUMATIC FEVER		X	HEART DISEASE		X
EPILEPSY		✓	STOMACH ULCER		X	RADIATION EXPOSURE		X
VISUAL OR HEARING DIFFICULTY		X	KIDNEY DISEASE		X	PSYCHIATRIC CARE		X
ALLERGIES		X	ARTHRITIS		X	SURGICAL PROCEDURES		X

OTHER ILLNESSES OR INJURIES ("None" so state) NONE

Have you ever received workmen's accident compensation? NO

Are you now drawing pension or disability benefits from any source? NO

If formally in armed services, what Type of discharge did you receive? NO

I certify that the above answers are true and understand that falsification of information furnished will be reason for dismissa

I agree that the information on this form may be released to my employer / prospective employer

(Signature of Applicant)

PHYSICIAN'S SUMMARY OF HISTORY: HEALTHY

PHYSICAL FINDINGS:

Height 5 Ft 10 Ins. Weight 194 lbs. Overweight ___ lbs. Underweight ___ lbs.

Color Hair BROWN Color Eyes Hazel Pulse 68/m Blood Pressure 135/70

VISION:	RIGHT EYE	LEFT EYE	COLOR VISION	HEARING:	RIGHT EAR	LEFT EAR
Without Glasses	For 20/ 20	For 20/ 20	✓	Adequate	✓	✓
	Near 20/	Near 20/				
With Glasses	For 20/	For 20/	DEPTH PERCEPTION	Inadequate		
	Near 20/	Near 20/	✓			

CLINICAL EVALUATION

AREA EXAMINED	NORMAL	ABNORMAL	REMARKS
1. HEAD, NECK, THYROID	✓		
2. EENT	✓		
3. CHEST, HEART & LUNGS	✓		
4. BREASTS	✓		
5. ABDOMEN	✓		
6. INGUINAL HERNIA	✓		
7. GENITALIA	✓		
8. RECTUM & PROSTATE	✓		
9. BACK, SPINE, BONES & JOINTS	✓		
10. EXTREMITIES	✓		
11. SKIN	✓		
12. NEUROLOGIC & EMOTIONAL STATUS	✓		
13. MENSTRUAL PERIODS (LMP)			
14. OTHER			

LABORATORY PROCEDURES:

Urinalysis: Reaction ___ Sp. Grav ___ Sugar ___ Albumin ___ Serology* ___ Hct. ___

*Laboratory Report MUST Be Attached.

Summary of Physical Defects: ___

CLASSIFICATION A B or C (Specific classification of physical requirements on back of page).

A. Qualified

B. Qualified for designated work but has defect which might prevent qualification for other jobs (Note any limitations

C. Needs evaluation by Health Committee prior to employment.

I do hereby certify that applicant is CLASS A and is/is not physically qualified for work as ASBESTOS ABATOR

30

11866

PULMONARY HISTORY

NAME: GREG L HOUSTON AGE: 35 SEX: M

HOME ADDRESS: 5701 MILL ST TELEPHONE: 815 678 4181

RICHMOND 60071

EMPLOYER: HOLIAN ASBESTOS ADDRESS:

OCCUPATION:

LENGTH OF EMPLOYMENT: 3 yr.

PREVIOUS WORK HISTORY: (Past 10 Years)

EMPLOYER	CITY	DUTIES	LENGTH OF SERVICE
BURDCO	HILLSIDE	Asbestos	4y
SSI-	S. HOLLAND.	"	2 yr
JANAIR	RICHMOND	Shipping Clerk	8 yr

MEDICAL HISTORY:

DO YOU SMOKE? No HOW MUCH? HOW MANY YEARS?

HAVE YOU SMOKED IN THE PAST? No HOW MUCH? HOW MANY YEARS?

DO YOU HAVE, OR HAVE YOU HAD, CHRONIC LUNG DISEASE? No.

COUGHING: No PNEUMONIA: No WHEEZING: No

TUBERCULOSIS: No SKIN TEST FOR TB: Yes RESULTS: Neg

SHORTNESS OF BREATH: No FATIGUE: No.

FREQUENT BRONCHITIS: No. ALLERGIES: No

ARE YOU TAKING ANY MEDICATION? No

DO YOU HAVE ANY GASTROINTESTINAL DISEASE? No

PERTINENT PULMONARY HISTORY NOT LISTED ABOVE: None

(Signature) 1-21-95

[redacted]

COMPANY NAME: Specialty Systems

CONTACT PERSON: Julie Smits

DATE OF TESTING: 1-17-94

The following applicant/employee, Greg Houston, has completed requested testing for respirator use.

✓ Yes, physically fit for all types of respiratory protection

_____ Pending repeat testing in 2 weeks

_____ Limited to simple face mask only

PHYSICIAN NAME (Print): R. C Hugh

PHYSICIAN SIGNATURE: [signature]

FACILITY NAME/LOCATION: ~~DOLTON OFFICENTER~~

FACILITY PHONE NUMBER: 1120 East Sibley Boulevard
Dolton, IL 60419
(708) 841-7460

Tacma/r p20

HOLIAN ASBESTOS
REMOVAL & ENCAPSULATION CORP.

7504 MEYER ROAD
SPRING GROVE, ILLINOIS 60081
TELEPHONE (815) 675-6633
FAX (815) 675-6361

INDUSTRIAL - COMMERCIAL - RESIDENTIAL

JAMES HOLIAN III
DENNIS HOLIAN
DANIEL HOLIAN
JAMES HOLIAN
TIMOTHY HOLIAN

QUALITATIVE FIT TEST METHOD IRRITANT SMOKE TEST

NAME GREG HOUSTON

SOCIAL SECURITY #: 428-15-7385

I acknowledge that I have undergone an irritant smoke qualitative fit test for my personally issued respirator.

RESPIRATOR P.A.P.R.

BRAND 3-M MODEL 3M 7885B

SMALL ____ MEDIUM X LARGE ____

T.C. NUMBER (FILTER) TC-21C-530

FIT TEST PROCEDURE:

1.	GROSS LEAK CHECK	✓	5.	NOD HEAD	✓
2.	BREATHE NORMALLY	✓	6.	REPEAT PASSAGE	✓
3.	BREATHE DEEPLY	✓	7.	JOG IN PLACE	✓
4.	TURN HEAD	✓	8.	BREATHE NORMALLY	✓

I understand the components below as being parts of the complete respirator program of Holian Asbestos Removal & Encapsulation Corp., and that I have been instructed in, and have an understanding of each of these subjects.

RESPIRATOR PROGRAM COMPONENTS:

Type of Respirators: Air purifying
Powered air purifying
Type "C"

Proper Uses of Each Type
Limitations of Respirators
Hazards of Misues
Cleaning/Maintenance Procedures

Fit Testing
Medical Evaluation
Emergency Situations

I have been issued and have in my possession a copy of the Holian Asbestos Removal & Encapsulation Corp. Respiratory Protection Program and understand the contents. I agree to follow all rules and regulations of its contents.

I have read and understand everything contained in this affidavit and sign this document freely, under no duress.

Greg Houston Date: 7-12-95
Employee Signature

Witness: Chris Head

JT4.005

PERIODIC MEDICAL QUESTIONNAIRE

1. NAME: GREG HOUSTON 2. DATE: 7-24-95

3. SOCIAL SECURITY NUMBER: 428-15-7385

4. JOB TITLE: FOREMAN

5. EMPLOYER: Holian Asbestos Removal & Encapsulation Corp.
7504 Meyer Road
Spring Grove, IL 60081
815/675-6683

6. MARITAL STATUS: ____ Single ____ Widowed X Married ____ Separated/ Divorced

7. OCCUPATIONAL HISTORY

7A. In the past year, did you work full time (30 hours per week or more) for 6 months or more?

X Yes ____ No

IF YES TO 7A:

7B. In the past year, did you work in a dusty job?

____ Yes X No

7C. Was dust exposure: ____ Mild ____ Moderate ____ Severe

7D. In the past year, were you exposed to gas or chemical fumes in your work?

____ Yes X No

7E. Was Exposure: ____ Mild ____ Moderate ____ Severe

8. RECENT MEDICAL HISTORY

8A. Do you consider yourself to be in good health?

X Yes ____ No

If NO, state reason: ____

8B. In the past year, have you developed:

Epilepsy?	____ Yes	X No
Rheumatic fever?	____ Yes	X No
Kidney disease?	____ Yes	X No
Bladder disease?	____ Yes	X No
Diabetes?	____ Yes	X No
Jaundice?	____ Yes	X No
Cancer?	____ Yes	X No

PERIODIC MEDICAL QUESTIONNAIRE
Page 2

9. CHEST COLDS AND CHEST ILLNESSES

9A. If you get a cold, does it usually go to your chest? (Usually means more than 1/2 the time)

___ Yes X No
___ Do Not Get Colds

9B. During the past year, have you had any chest illnesses that have kept you off work, indoors at home, or in bed?

X Yes ___ No
___ Does Not Apply

If YES to 9B:

9C. Did you produce phlegm with any of these chest illnesses?

X Yes ___ No
___ Does Not Apply

9D. In the past year, how many such illnesses with (increased) phlegm did you have which lasted a week or more?

1 Number of illnesses ___ No such illnesses

10. RESPIRATORY SYSTEM

10A. In the past year have you had:

	Yes or No	Further Comment
Asthma	NO	
Bronchitis	NO	
Hay Fever	NO	
Other Allergies	NO	
Pneumonia (walking)	~~NO~~ yes	
Tuberculosis	NO	
Chest Surgery	NO	
Other Lung Problems	NO	
Heart Disease	NO	
DO YOU HAVE:		
Frequent Colds	NO	
Chronic Cough	NO	
Shortness of Breath when Walking or Climbing 1 Flight of Stairs	NO	
DO YOU:		
Wheeze	NO	
Cough up Phlegm	NO	
Smoke cigarettes	NO	___ Packs/Day ___ How long

SIGNATURE [signature] DATE: 7-24-95

RECEIVED JAN 27 1994

DOCTORS OFFICENTER/ILLINOIS

PATIENT NAME: GREGORY HOUSTON AGE: 34 DOB: 10-7-59

TYPE OF EXAMINATION: CHEST EXAM DATE: 1-17-94

COMPANY NAME: SPECIALTY SYSTEMS OF IL

PHYSICIAN NAME/SIGNATURE: RAKESH CHUGH

PHYSICIAN INITIAL IMPRESSION: WNL

RADIOLOGIST INTERPRETATION:

[✓] Normal exam - see written report on second page

[ ] Agree with initial impression

[ ] Disagree with initial impression; see COMMENTS

COMMENTS:

J. Jacobs, M.D.
Radiologist/Signature

Date Reviewed

[✓] Report called into SPECIALTY SYS / JULIE JORDAN on 1-26-94
Company name/Contact Date

by R. Robinson
Staff Name

Jacobs/rc 12/17/93

OFFICE STAMP

DOLTON OFFICENTER
1120 East Sibley Boulevard
Dolton, IL 60419
(708) 841-7460

State of Illinois

A 042262

Department of Public Health

LICENSE, PERMIT, CERTIFICATION, REGISTRATION

The person, firm or corporation whose name appears on this certificate has complied with the provisions of the Illinois Statutes and/or rules and regulations and is hereby authorized to engage in the activity as indicated below.

JOHN R. LUMPKIN, M.D.
DIRECTOR

Issued under the authority of
The State of Illinois
Department of Public Health

EXPIRATION DATE	CATEGORY	I.D. NUMBER
05/15/96	5319	100-1594

MICHAEL RABELHOFER

SUPERVISOR

BUSINESS ADDRESS

MICHAEL RABELHOFER
5701 BROADWAY
RICHMOND IL 60071

THIS LICENSE IS NOT VALID IF YOUR IDPH
REFRESHER COURSE CERTIFICATE IS NOT CURRENT

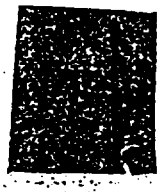
Printed by Authority of the State of Illinois • 2/91 •

State of Illinois A035874
Department of Public Health
LICENSE, PERMIT, CERTIFICATION, REGISTRATION
ASBESTOS WORKER LICENSE

EXPIRATION DATE	CATEGORY	I.D. NUMBER
02/01/96	057	057055170

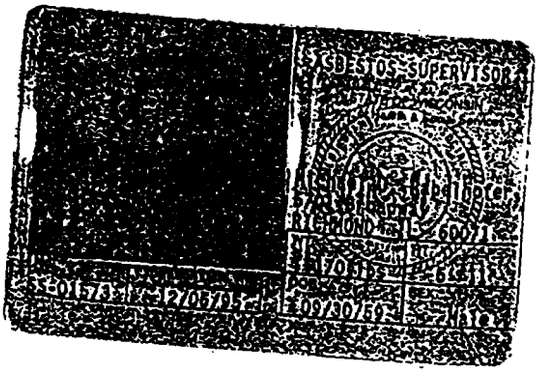
MICHAEL J. RABELHOFER
ASBESTOS WORKER LICENSE
THIS LICENSE IS NOT VALID IF YOUR
COURSE CERTIFICATE IS NOT CURRENT.

THE PERSON, FIRM OR CORPORATION WHOSE NAME APPEARS ON THIS CERTIFICATE HAS COMPLIED WITH THE PROVISIONS OF THE ILLINOIS STATUTES AND/OR RULES AND REGULATIONS AND IS HEREBY AUTHORIZED TO ENGAGE IN THE ACTIVITY INDICATED ON THE FACE OF THIS CARD.



ISSUED UNDER THE AUTHORITY OF
STATE OF ILLINOIS
DEPARTMENT OF PUBLIC HEALTH

SIGNATURE OF LICENSEE


SBESTOS SUPERVISOR
09/30/59

CERTIFICATE OF ACHIEVEMENT

Construction and General Laborers
District Council of Chicago and
Vicinity Training Trust Fund
4N250 OLD GARY AVE
CLOVERDALE, ILLINOIS 60103
(708)653-0006

LABORERS' TRAINING & EDUCATION TRUST FUND
SAFETY — EDUCATION — PRODUCTIVITY
CHICAGO & VICINITY

No. S 555 R

MAILING ADDRESS
CHICAGO LABORERS TRAINING FUND
P.O. BOX 88658
CAROL STREAM, ILLINOIS 60188

This is to certify that MICHAEL RABELHOFER has successfully completed the ASBESTOS ABATEMENT SUPERVISORS' REFRESHER TRAINING course and passed the examination with a minimum score of at least 70%. Training was in accordance with TSCA Title II . This course is EPA, Illinois Department of Public Health and Indiana Department of Environmental Management accredited.

COURSE DATE 10/14/94 THRU 10/14/94
EXAM DATE 10/14/94
EXPIRATION DATE 10/14/95

ANTHONY SULANO
Administrator

DOCUMENTATION: MEDICAL FITNESS FOR ASBESTOS REMOVAL AND RESPIRATOR USE

PATIENT NAME: Michael J Rabelhofer DATE: 3/18/95

DATE OF BIRTH: 9-30-59 AGE: 35y

SOCIAL SECURITY NUMBER: 347 58 5296

FITNESS CRITERIA

1. This is to certify, in accordance with the OSHA Asbestos Standard, 29 CFR 1926.58 (M) (1) (2) (3) and (4) and 29 CFR 1910.1001, I have examined the above mentioned individual;

2. Based on my findings, I have determined this individual may use respiratory device while performing his/her required employment services;

3. The results of my examination have not detected a medical condition which would place the employee at an increased risk of material health impairment from exposure to asbestos;

4. In accordance with OShA requirement, I have informed the above named individual of the results of his/her medical examination and of any medical condition that may result from his/her exposure to asbestos, and

5. I have informed the above named individual of the health risks involved in smoking, of synergistic relationship between cigarette smoking and asbestos exposure in producing lung cancer, and that cessation of smoking will reduce the risk of lung cancer.

PHYSICIAN'S APPROVAL:

It is my medical opinion that the above-named individual is medically fit to engage in asbestos removal and wear respiratory protective equipment as required by the Illinois Department of Public Health (Asbestos Abatement Act Rules and Regulations, Section 855.60) and OSHA 29CFR 1926.58 M (1) (2) (3) (4) and OSHA 29 CFR 1910.1001.

Physician's Signature [signature]

Date 3/18/95

PULMONARY HISTORY

NAME: Michael J Rabelhofer AGE: 35 SEX: M

HOME ADDRESS: 5701 Broadway TELEPHONE: 678 4696

Richmond Il 60071

EMPLOYER: Holian Industrial ADDRESS:

OCCUPATION:

LENGTH OF EMPLOYMENT: 8 yr.

PREVIOUS WORK HISTORY: (Past 10 Years)

EMPLOYER	CITY	DUTIES	LENGTH OF SERVICE
Gingham Farmer	Bloomingdale	Sale	6 yr

MEDICAL HISTORY:

DO YOU SMOKE? No HOW MUCH? ____ HOW MANY YEARS? ____

HAVE YOU SMOKED IN THE PAST? No HOW MUCH? ____ HOW MANY YEARS? ____

DO YOU HAVE, OR HAVE YOU HAD, CHRONIC LUNG DISEASE? No

COUGHING: No PNEUMONIA: No WHEEZING: No

TUBERCULOSIS: No SKIN TEST FOR TB: Yes RESULTS: Neg

SHORTNESS OF BREATH: No FATIGUE: No

FREQUENT BRONCHITIS: No ALLERGIES: No

ARE YOU TAKING ANY MEDICATION? No

DO YOU HAVE ANY GASTROINTESTINAL DISEASE? No

PERTINENT PULMONARY HISTORY NOT LISTED ABOVE: None

Michael J. Rabelhofer 3/18/95

(Signature) (Date)

NAME (Last)	(First)	(Initial)	JOB CLASSIFICATION	SEX	AGE	DATE
RABECHOFER	MICHAEL	J			35	3/12/97

DIVISION OR PLANT	DEPARTMENT	LOCATION

HISTORY: Have you had or are you under treatment for any of the following: (Check every item or write "Don't Know").

ITEM	YES	NO	ITEM	YES	NO	ITEM	YES
HEAD BACK OR KNEE INJURIES		X	TUBERCULOSIS		X	DIABETES	
ASTHMA OR SHORTNESS OF BREATH		X	RHEUMATIC FEVER		X	HEART DISEASE	
EPILEPSY		X	STOMACH ULCER		X	RADIATION EXPOSURE	
VISUAL OR HEARING DIFFICULTY		X	KIDNEY DISEASE		X	PSYCHIATRIC CARE	
ALLERGIES		X	ARTHRITIS			SURGICAL PROCEDURES	

OTHER ILLNESSES OR INJURIES ("None" to state) NONE

Have you ever received workmen's accident compensation? NO

Are you now drawing pension or disability benefits from any source? NO

If formally in armed services, what Type of discharge did you receive? NO

I certify that the above answers are true and understand that falsification of information furnished will be reason for dismiss

I agree that the information on this form may be released to my employer / prospective employer Michael J Rabechofer (Signature of Applicant)

PHYSICIAN'S SUMMARY OF HISTORY: Healthy

PHYSICAL FINDINGS.

Height 6 Ft ___ Ins. Weight 186 Lbs. Overweight ___ Lbs Underweight ___ Lbs

Color Hair DARK BROWN Color Eyes Bu Pulse ___ Blood Pressure 112/76

VISION:	RIGHT EYE	LEFT EYE	COLOR VISION	HEARING:	RIGHT EAR	LEFT EAR
Without Glasses	For 20/ 20	For 20/ 20	✓	Adequate	✓	✓
	Near 20/	Near 20/				
With Glasses	For 20/	For 20/	DEPTH PERCEPTION	Inadequate		
	Near 20/	Near 20/	✓			

CLINICAL EVALUATION

AREA EXAMINED	NORMAL	ABNORMAL	REMARKS
1. HEAD, NECK, THYROID			
2. EENT			
3. CHEST, HEART & LUNGS			
4. BREASTS			
5. ABDOMEN			
6. INGUINAL HERNIA			
7. GENITALIA			
8. RECTUM & PROSTATE			
9. BACK, SPINE, BONES & JOINTS			
10. EXTREMITIES			
11. SKIN			
12. NEUROLOGIC & EMOTIONAL STATUS			
13. MENSTRUAL PERIODS (LMP)			
14. OTHER			

LABORATORY PROCEDURES:

Urinalysis: Reaction ___ Sp. Grav ___ Sugar ___ Albumin ___ Serology* ___ Hct. ___

*Laboratory Report MUST Be Attached.

Summary of Physical Defects: ___

CLASSIFICATION A B or C (Specific classification of physical requirements on back of page).

A. Qualified

B. Qualified for designated work but has defect which might prevent qualification for other jobs (Note any limitation

C. Needs evaluation by Health Committee prior to employment.

I do hereby certify that applicant is CLASS A and is/is not physically qualified for work as ASBESTOS REBA 70

Address 5510 KENOSHA RICHMOND Signed: [signature] M.

BASIC EXAMINATION FOR ASBESTOS WORKERS

COMPANY: Hollan Asbestos

DATE: 3/18/05

APPLICANT NAME: Michael J Rabelhofer

SS#: 347 58 8296

ADDRESS: 5701 Broadway
Richmond IL

TELEPHONE: 678 4696

DATE OF BIRTH: 9-30-54

MEDICATIONS: No

KNOWN DRUG ALLERGIES: No

BROKEN BONES: Left Ringer finger

SURGERY: No

DOES PATIENT WEAR GLASSES OR CONTACTS: No

DOES PATIENT HAVE KNOWN PHOBIAS REGARDING HEIGHTS OR CONFINED SPACES: No

HAS PATIENT EVER HAD PROBLEMS WITH EARS: No

CARDIO-PULMONARY EXAMINATION

HEIGHT: 6'

WEIGHT: 186 lb

BLOOD PRESSURE: SYSTOLIC 112 DIASTOLIC 76 PULSE 68

HEART: MURMURS None RATE 6/8

RHYTHM Reg ENLARGEMENT None

LUNGS: Trachea midline. Movements equal full Bile 12/
PN. resonant BS. vesicular No adv sounds

5295
5150

PULMONARY FUNCTION: ~~(Copy Attached)~~

WITHIN NORMAL LIMITS ✓ OUTSIDE NORMAL LIMITS

PA CHEST X-RAY: (Copy Attached)

WITHIN NORMAL LIMITS OUTSIDE NORMAL LIMITS

RECOMMENDATIONS: Healthy

It is my opinion that the above named patient is ___ ~~is not~~ ___ qualified to wear a respirator in the performance of his/her job:

[signature]

(Signature)

NO. ILLINOIS MEDICAL CTR.
P.O. BOX 1570
MCHENRY, IL 60051-1570
815-344-5000
RADIOLOGY DEPARTMENT

ENT NAME:	RABELHOFER, MICHAEL J	M/R NUMBER:	102836
ERING DR :	PARAMANANDHAN, T. L.	RADIOLOGY NUMBER:	102836
M DATE:	4/07/94	TRANSCRIBE DATE:	4/08/94
TPATIENT:	XR XRAY-MEDICAL IMAGING	ORDER NUMBER:	1850447
XAM DESCRIPTION:	XRAY CHEST 2VIEW CONS O/P	ACCT. NUMBER:	1047294
		PHONE NUMBER:	(815) 678-4594

HISTORY: RULE OUT ASBESTOS EXPOSURE

CHEST:

Examination of the chest demonstrates the heart to be normal in size and configuration. The lungs are well expanded and appear free of active infiltration. The costophrenic sinuses are clear.

IMPRESSION: No active infiltrates are seen within the lungs. Normal appearing chest.

D: 4/8/94 VS
T: 4/8/94 jab

"Signature affixed prior to physician review"

Northern Illinois Medical Center

DOCTOR'S COPY

SHAH, VANDANA M.D.

DATE: 4/08/94

1006017 (R/8/92)

HOLIAN ASBESTOS
REMOVAL & ENCAPSULATION CORP.

INDUSTRIAL - COMMERCIAL - RESIDENTIAL

QUALITATIVE FIT TEST METHOD IRRITANT SMOKE TEST

NAME Mike Rabelhofer

SOCIAL SECURITY #: 347 58 8296

I acknowledge that I have undergone an irritant smoke qualitative fit test for my personally issued respirator.

RESPIRATOR PAPR

BRAND 3M MODEL 3M 7855T

SMALL _____ MEDIUM _____ LARGE X

T.C. NUMBER (FILTER) T.C 216 530

FIT TEST PROCEDURE:

1.	GROSS LEAK CHECK	✓	5.	NOD HEAD	✓
2.	BREATHE NORMALLY	✓	6.	REPEAT PASSAGE	✓
3.	BREATHE DEEPLY	✓	7.	JOG IN PLACE	✓
4.	TURN HEAD	✓	8.	BREATHE NORMALLY	✓

I understand the components below as being parts of the complete respirator program of Holian Asbestos Removal & Encapsulation Corp., and that I have been instructed in, and have an understanding of each of these subjects.

RESPIRATOR PROGRAM COMPONENTS:

Type of Respirators: Air purifying
Powered air purifying
Type "C"

Proper Uses of Each Type
Limitations of Respirators
Hazards of Misues
Cleaning/Maintenance Procedures

Fit Testing
Medical Evaluation
Emergency Situations

I have been issued and have in my possession a copy of the Holian Asbestos Removal & Encapsulation Corp. Respiratory Protection Program and understand the contents. I agree to follow all rules and regulations of its contents.

I have read and understand everything contained in this affidavit and sign this document freely, under no duress.

Mike Rabelhofer
Employee Signature

Date: 10-11-95

Witness: Forrest A. Hartung

JT4.005

PERIODIC MEDICAL QUESTIONNAIRE

1. NAME: Mike Rasselhoff 2. DATE: 5/21/95

3. SOCIAL SECURITY NUMBER: 347-58-8296

4. JOB TITLE: Supervisor

5. EMPLOYER: Holian Asbestos Removal & Encapsulation Corp.
7504 Meyer Road
Spring Grove, IL 60081
815/675-6683

6. MARITAL STATUS: ____ Single ✓ Married ____ Separated/ Divorced
____ Widowed

7. OCCUPATIONAL HISTORY

7A. In the past year, did you work full time (30 hours per week or more) for 6 months or more?

✓ Yes ____ No

IF YES TO 7A:

7B. In the past year, did you work in a dusty job?

✓ Yes ____ No

7C. Was dust exposure: ____ Mild ✓ Moderate ____ Severe

7D. In the past year, were you exposed to gas or chemical fumes in your work?

✓ Yes ____ No

7E. Was Exposure: ____ Mild ✓ Moderate ____ Severe

8. RECENT MEDICAL HISTORY

8A. Do you consider yourself to be in good health?

✓ Yes ____ No

If NO, state reason: ____

8B. In the past year, have you developed:

Epilepsy?	____ Yes	✓ No
Rheumatic fever?	____ Yes	✓ No
Kidney disease?	____ Yes	✓ No
Bladder disease?	____ Yes	✓ No
Diabetes?	____ Yes	✓ No
Jaundice?	____ Yes	✓ No
Cancer?	____ Yes	✓ No

9. CHEST COLDS AND CHEST ILLNESSES

9A. If you get a cold, does it usually go to your chest? (Usually means more than 1/2 the time)

____ Yes ✓ No
____ Do Not Get Colds

9B. During the past year, have you had any chest illnesses that have kept you off work, indoors at home, or in bed?

____ Yes ✓ No
____ Does Not Apply

If YES to 9B:

9C. Did you produce phlegm with any of these chest illnesses?

____ Yes ____ No
____ Does Not Apply

9D. In the past year, how many such illnesses with (increased) phlegm did you have which lasted a week or more?
__1__ Number of illnesses ____ No such illnesses

10. RESPIRATORY SYSTEM

10A. In the past year have you had:

	Yes or No	Further Comment
Asthma	✓	
Bronchitis	✓	
Hay Fever	✓	
Other Allergies	✓	
Pneumonia	✓	
Tuberculosis	✓	
Chest Surgery	✓	
Other Lung Problems	✓	
Heart Disease	✓	
DO YOU HAVE:		
Frequent Colds	✓	
Chronic Cough	✓	
Shortness of Breath when Walking or Climbing 1 Flight of Stairs	✓	
DO YOU:		
Wheeze	✓	
Cough up Phlegm	✓	
Smoke cigarettes	✓	____ Packs/Day ____ How long

SIGNATURE Michael Rebuchef DATE: 3/21/95

State of Illinois A038111
Department of Public Health
LICENSE, PERMIT, CERTIFICATION, REGISTRATION
ASBESTOS WORKER LICENSE

EXPIRATION DATE	CATEGORY	I.D. NUMBER
02/01/96		057063562

WILLIAM K [illegible]LHOFER
ASBESTOS WO[illegible]CENSE
THIS LICENSE IS NOT VALID IF YOUR
COURSE CERTIFICATE IS NOT CURRENT.

THE PERSON, FIRM OR CORPORATION WHOSE NAME APPEARS ON THIS CERTIFICATE HAS COMPLIED WITH THE PROVISIONS OF THE ILLINOIS STATUTES AND/OR RULES AND REGULATIONS AND IS HEREBY AUTHORIZED TO ENGAGE IN THE ACTIVITY INDICATED ON THE FACE OF THIS CARD.

ISSUED UNDER THE AUTHORITY OF
STATE OF ILLINOIS
DEPARTMENT OF PUBLIC HEALTH

SIGNATURE OF LICENSEE

ASBESTOS WORKER

STATE OF WISCONSIN
Dept. of Health & Social Services

William K. Rabelhofer
2504 Fairview Lane
MCHENRY IL 60050

WT. 165 lbs.	HT. 6' 3"
DOB: 06/22/68	SEX Male

No. WW-03409	Expiration Date 10/14/96

CERTIFICATE OF ACHIEVEMENT

Construction and General Laborers
District Council of Chicago and
Vicinity Training Trust Fund
4N250 OLD GARY AVE
CLOVERDALE, ILLINOIS 60102
(708)653-0066

No. [illegible]

MAILING ADDRESS
CHICAGO LABORERS TRAINING FUND
P.O. BOX 88658
CAROL STREAM, ILLINOIS [illegible]

This is to certify that WILLIAM RABELHOFER has successfully completed the ASBESTOS ABATEMENT SUPERVISORS' REFRESHER TRAINING course and passed the examination with a minimum score of at least 70%. Training was in accordance with TSCA Title II . This course is EPA, Illinois Department of Public Health and Indiana Department of Environmental Management accredited.

COURSE DATE 10/05/95 THRU 10/05/95
EXAM DATE 10/05/95
EXPIRATION DATE 10/05/96

ANTHONY SCLANO
Administrator

Heart Attack

Signals

Know the signals: an uncomfortable pressure, squeezing, fullness, or pain in the center of the chest, behind the breast bone, which may spread to the shoulder, neck, or arms (the pain may not be severe). Other signals may include sweating, nausea, shortness of breath, and a feeling of weakness.

Actions for Survival

1. Recognize the "signals."
2. Stop activity and sit or lie down.
3. Act at once if pain lasts for two minutes or more: Call the emergency rescue service or go to the nearest hospital emergency room with 24 hour service.

American Heart Association
Illinois Affiliate

AMERICAN HEART ASSOCIATION, ILLINOIS AFFILIATE
CARDIOPULMONARY RESUSCITATION COURSE

William K. Rabelhofer
has completed the Basic CPR course noted below:

Course Type: A _____ B X C _____ D _____
(To instructor: Check type of course completed above)

Cardholders Signature _____

Completion Date 6/14/94 Suggested Retraining Date 6/95

Instructor Signature Wendy Tolley

American Heart Association, Illinois Affiliate / P.O. Box 2666, Springfield, IL 62708

American Red Cross

EXP

This certifies that
Bill Rabelhofer
has completed the
STANDARD FIRST AID
course of instruction
at Holian Insul Co.
6-13-92
Date course completed

Chairman, American Red Cross

NOTE: Training in Standard First Aid is valid for three years from the course completion date.

Name of Chapter MID-AMERICAN CHAPTER

Chapter Representative [illegible]

Instructor Pat Martin

Holder's Signature _____

42 Cert. 3207 (Apr. 1988)

DOCUMENTATION: MEDICAL FITNESS FOR ASBESTOS REMOVAL AND RESPIRATOR USE

PATIENT NAME: William K Rabelhofer DATE: 3/4/95

DATE OF BIRTH: 6-22-68. AGE: 27.

SOCIAL SECURITY NUMBER: 320 74 2931

FITNESS CRITERIA

1. This is to certify, in accordance with the OSHA Asbestos Standard, 29 CFR 1926.58 (M) (1) (2) (3) and (4) and 29 CFR 1910.1001, I have examined the above mentioned individual;

2. Based on my findings, I have determined this individual may use respiratory device while performing his/her required employment services;

3. The results of my examination have not detected a medical condition which would place the employee at an increased risk of material health impairment from exposure to asbestos;

4. In accordance with OShA requirement, I have informed the above named individual of the results of his/her medical examination and of any medical condition that may result from his/her exposure to asbestos, and

5. I have informed the above named individual of the health risks involved in smoking, of synergistic relationship between cigarette smoking and asbestos exposure in producing lung cancer, and that cessation of smoking will reduce the risk of lung cancer.

PHYSICIAN'S APPROVAL:

It is my medical opinion that the above-named individual is medically fit to engage in asbestos removal and wear respiratory protective equipment as required by the Illinois Department of Public Health (Asbestos Abatement Act Rules and Regulations. Section 855.60) and OSHA 29CFR 1926.58 M (1) (2) (3) (4) and OSHA 29 CFR 1910.1001.

Physician's Signature J. L. Parramanand Cr

Date 3/4/95

PULMONARY HISTORY

NAME: William K. Rabelhofer AGE: 26 SEX: M

HOME ADDRESS: 2504 Fairview Lane TELEPHONE: 385 5146

McHenry

EMPLOYER: Holian Asbestos Removal ADDRESS:

OCCUPATION:

LENGTH OF EMPLOYMENT: 7y.

PREVIOUS WORK HISTORY: (Past 10 Years)

EMPLOYER	CITY	DUTIES	LENGTH OF SERVICE
Fox Lake CC		Golf Cour	2y.
American	Lake Geneva	Housemen	1y.

MEDICAL HISTORY:

DO YOU SMOKE? No HOW MUCH? ____ HOW MANY YEARS? ____

HAVE YOU SMOKED IN THE PAST? No HOW MUCH? ____ HOW MANY YEARS? ____

DO YOU HAVE, OR HAVE YOU HAD, CHRONIC LUNG DISEASE? No

COUGHING: No PNEUMONIA: No WHEEZING: No

TUBERCULOSIS: No SKIN TEST FOR TB: Yes RESULTS: Neg

SHORTNESS OF BREATH: No FATIGUE: No

FREQUENT BRONCHITIS: No ALLERGIES: No

ARE YOU TAKING ANY MEDICATION? NAPROXEN

DO YOU HAVE ANY GASTROINTESTINAL DISEASE? No

PERTINENT PULMONARY HISTORY NOT LISTED ABOVE: None

William K. Rabelhofer 3/4/95

(Signature) (Date)

BASIC EXAMINATION FOR ASBESTOS WORKERS

COMPANY: Holian Asbestos Removal DATE: 3/4/4

APPLICANT NAME: William K. Rabelhofer SS#: 320-74-2931

ADDRESS: 2504 Fairview Lane TELEPHONE: 385-5146

McHenry DATE OF BIRTH: 6-22-68

MEDICATIONS: Naproxen KNOWN DRUG ALLERGIES: None

BROKEN BONES: Toe left ear SURGERY: Toe

DOES PATIENT WEAR GLASSES OR CONTACTS: Contacts

DOES PATIENT HAVE KNOWN PHOBIAS REGARDING HEIGHTS OR CONFINED SPACES: No

HAS PATIENT EVER HAD PROBLEMS WITH EARS: No

CARDIO-PULMONARY EXAMINATION

HEIGHT: 72" WEIGHT: 182.

BLOOD PRESSURE: SYSTOLIC 110 DIASTOLIC 70 PULSE 70/

HEART: MURMURS None RATE 70/-

RHYTHM Regular ENLARGEMENT None

LUNGS: Trachea midline. Movement equal, full P.N. resonant B.S. vesicular No adv sounds

5700/5736

PULMONARY FUNCTION: (~~Copy Attached~~)

WITHIN NORMAL LIMITS ✓ OUTSIDE NORMAL LIMITS

PA CHEST X-RAY: (Copy Attached)

WITHIN NORMAL LIMITS OUTSIDE NORMAL LIMITS

RECOMMENDATIONS: Healthy

It is my opinion that the above named patient is ___ ~~is not~~ ___ qualified to wear a respirator in the performance of his/her job:

T L Paramanandhan

(Signature)

Physical Examination Record

NAME (Last)	(First)	(Initial)	JOB CLASSIFICATION	SEX	AGE	DATE
RABELHOFER	William	K		M	26	3/6/[illegible]

DIVISION OR PLANT	DEPARTMENT	LOCATION

Any 2 390 into Acetabul + LS

HISTORY: Have you had or are you under treatment for any of the following (Check every item or write "Don't Know")

ITEM	YES	NO	ITEM	YES	NO	ITEM	YES	NO
HEAD BACK OR KNEE INJURIES	X		TUBERCULOSIS		X	DIABETES		X
ASTHMA OR SHORTNESS OF BREATH		X	RHEUMATIC FEVER		X	HEART DISEASE		X
EPILEPSY		X	STOMACH ULCER		X	RADIATION EXPOSURE		X
VISUAL OR HEARING DIFFICULTY		X	KIDNEY DISEASE		X	PSYCHIATRIC CARE		X
ALLERGIES		X	ARTHRITIS		X	SURGICAL PROCEDURES		X

OTHER ILLNESSES OR INJURIES ("None" if none) NONE

Have you ever received workmen's accident compensation? Yes. TOE # 4 yr ago

Are you now drawing pension or disability benefits from any source? No.

If formally in armed services, what Type of discharge did you receive? No.

I certify that the above answers are true and understand that falsification of information furnished will be reason for dismiss

I agree that the information on this form may be released to my employer / prospective employer William K. Rabelhofer (Signature of Applicant)

PHYSICIAN'S SUMMARY OF HISTORY. Healthy

PHYSICAL FINDINGS

Height 6 Ft 2 Ins. Weight 182 lbs. Overweight / lbs. Underweight / lb

Color Hair Black Color Eyes Brown Pulse 70/m Blood Pressure 110/70

VISION:	RIGHT EYE	LEFT EYE	COLOR VISION	HEARING:	RIGHT EAR	LEFT EAR
Without Glasses	For 20/ 20	For 20/ 20	Normal	Adequate	—	—
	Near 20/	Near 20/				
With Glasses	For 20/ 20	For 20/ 20	DEPTH PERCEPTION —	Inadequate		
	Near 20/	Near 20/				

CLINICAL EVALUATION

AREA EXAMINED	NORMAL	ABNORMAL	REMARKS
1. HEAD, NECK, THYROID			
2. TEETH			
3. CHEST, HEART & LUNGS			
4. BREASTS			
5. ABDOMEN			
6. INGUINAL HERNIA			
7. GENITALIA			
8. RECTUM & PROSTATE			
9. BACK, SPINE, BONES & JOINTS			
10. EXTREMITIES			
11. SKIN			
12. NEUROLOGIC & EMOTIONAL STATUS			
13. MENSTRUAL PERIODS (LMP)			
14. OTHER			

LABORATORY PROCEDURES:

Urinalysis: Reaction____ Sp. Grav____ Sugar____ Albumin____ Serology*____ Hct. ____

*Laboratory Report MUST Be Attached.

Summary of Physical Defects:

CLASSIFICATION A B or C (Specific classification of physical requirements on back of page).

A. Qualified

B. Qualified for designated work but has defect which might prevent qualification for other jobs (Note any limitations.

C Needs evaluation by Health Committee prior to employment.

I do hereby certify that applicant is CLASS A and is not physically qualified for work as Asbestos

Address 5570 KENOSHA Signed J. L. Pauemmuel M.D.

[illegible]

[illegible]

[illegible]

[illegible]

[illegible]

[illegible]

RADIOLOGY DEPARTMENT

PATIENT NAME: RABELHOFER, WILLIAM K
ORDERING DR : PARAMANANDHAN, T. L.
EXAM DATE: 3/14/94
OUTPATIENT: XR XRAY-MEDICAL IMAGING
EXAM DESCRIPTION: XRAY CHEST 2VIEW COMP O/P

M/R NUMBER: 138016
RADIOLOGY NUMBER: 138015
TRANSCRIBE DATE: 3/15/94
ORDER NUMBER: 1835044
ACCT. NUMBER: 1244011
PHONE NUMBER: (815) 385-5146

HISTORY: ROUTINE

CHEST:

Examination of the chest demonstrates the heart to be normal in size and configuration. The lungs are well expanded and appear free of active infiltration. The costophrenic sinuses are clear.

IMPRESSION: No active infiltrates are seen within the lungs. Normal appearing chest.

D: 03/15/94 VS
T: 03/15/94 jb

"Signature affixed prior to physician review"

Northern Illinois Medical Center

DOCTOR'S COPY

SHAH, VANDANA M.D.

1006017 (R/8/92)

DATE: 3/15/94

HOLIAN ASBESTOS REMOVAL & ENCAPSULATION CORP.

INDUSTRIAL - COMMERCIAL - RESIDENTIAL

[illegible] MEYER ROAD
SPRING GROVE, ILLINOIS 60081
TELEPHONE (815) 675-6683
FAX (815) 675-6361

JAMES HOLIAN III
DENNIS HOLIAN
DANIEL HOLIAN
JAMES HOLIAN
TIMOTHY HOLIAN

QUALITATIVE FIT TEST METHOD IRRITANT SMOKE TEST

NAME WILLIAM RABELHOFER

SOCIAL SECURITY #: 320-74-2931

I acknowledge that I have undergone an irritant smoke qualitative fit test for my personally issued respirator.

RESPIRATOR P.A.P.R

BRAND 3M MODEL

SMALL MEDIUM LARGE

T.C. NUMBER (FILTER)

FIT TEST PROCEDURE:

1. GROSS LEAK CHECK ✓
2. BREATHE NORMALLY ✓
3. BREATHE DEEPLY ✓
4. TURN HEAD ✓
5. NOD HEAD ✓
6. REPEAT PASSAGE ✓
7. JOG IN PLACE ✓
8. BREATHE NORMALLY ✓

I understand the components below as being parts of the complete respirator program of Holian Asbestos Removal & Encapsulation Corp., and that I have been instructed in, and have an understanding of each of these subjects.

RESPIRATOR PROGRAM COMPONENTS:

Type of Respirators: Air purifying
Powered air purifying
Type "C"

Proper Uses of Each Type
Limitations of Respirators
Hazards of Misues
Cleaning/Maintenance Procedures

Fit Testing
Medical Evaluation
Emergency Situations

I have been issued and have in my possession a copy of the Holian Asbestos Removal & Encapsulation Corp. Respiratory Protection Program and understand the contents. I agree to follow all rules and regulations of its contents.

I have read and understand everything contained in this affidavit and sign this document freely, under no duress.

William Rabelhofer
Employee Signature

Date: 9/6/95

Witness: [signature]

JT4.005

PERIODIC MEDICAL QUESTIONNAIRE

1. NAME: WILLIAM RABELHOFER 2. DATE: 9-5-95

3. SOCIAL SECURITY NUMBER: 320-74-2931

4. JOB TITLE: ASBESTOS WORKER

5. EMPLOYER: Holian Asbestos Removal & Encapsulation Corp.
7504 Meyer Road
Spring Grove, IL 60081
815/675-6683

6. MARITAL STATUS: ____ Single ____ Widowed __X__ Married ____ Separated/ Divorced

7. OCCUPATIONAL HISTORY

7A. In the past year, did you work full time (30 hours per week or more) for 6 months or more?

__X__ Yes ____ No

IF YES TO 7A:

7B. In the past year, did you work in a dusty job?

__X__ Yes ____ No

7C. Was dust exposure: ____ Mild __X__ Moderate ____ Severe

7D. In the past year, were you exposed to gas or chemical fumes in your work?

__X__ Yes ____ No

7E. Was Exposure: ____ Mild __X__ Moderate ____ Severe

8. RECENT MEDICAL HISTORY

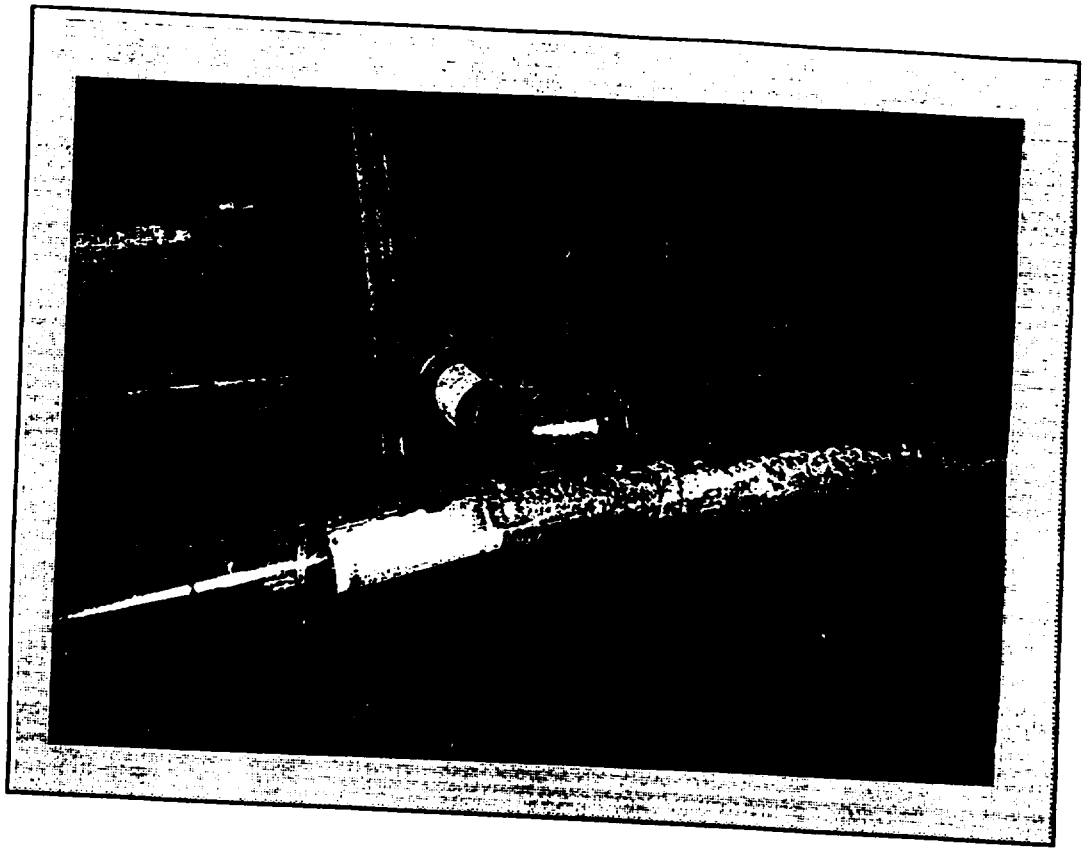
8A. Do you consider yourself to be in good health?

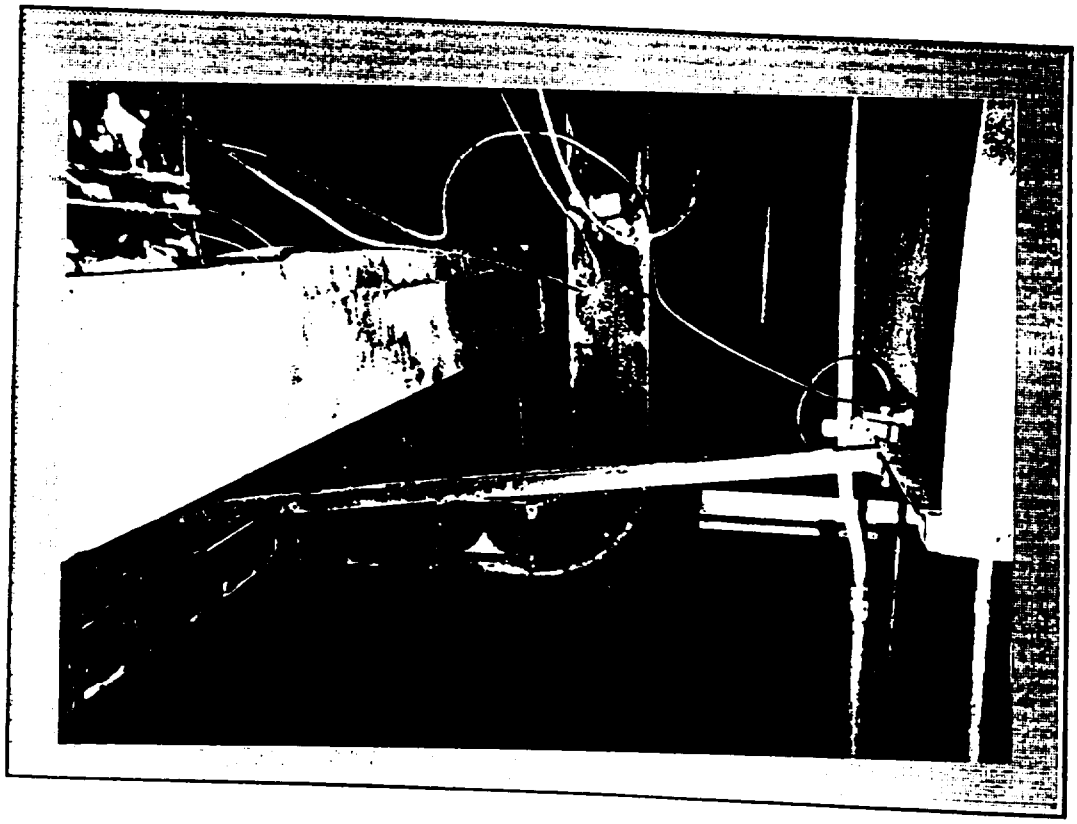
__X__ Yes ____ No

If NO, state reason: _____

8B. In the past year, have you developed:

Epilepsy?	____ Yes	__X__ No
Rheumatic fever?	____ Yes	__X__ No
Kidney disease?	____ Yes	__X__ No
Bladder disease?	____ Yes	__X__ No
Diabetes?	____ Yes	__X__ No
Jaundice?	____ Yes	__X__ No
Cancer?	____ Yes	__X__ No





WASTE SHIPMENT RECORD

24 Hour Response Telephone Number: 815/675-6683

Generator

1. Work Site Name and Mailing Address: See attached
Owner's Name:
Owner's Phone No.:

2. Operator's Name and Address: Holian Asbestos Removal & Encapsulation Corp.
7504 Meyer Road, Spring Grove, IL 60081
Operator's Phone No.: 815/675-6683

3. Waste Disposal Site (WDS) Name, Mailing Address, and Physical Site Location:
Pheasant Run Recycling & Disposal Facility
19414 60th Street
Bristol, Wisconsin 53104
WDS Phone No.: 414/857-7956

4. Name and Address of Responsible Agency
IEPA, 220 Churchill Rd., Springfield, IL 62706
USEPA, 230 S. Dearborn St., Chicago, IL 60604
DNR-Bureau of Air Management
P.O. Box 7921
Madison, WI 53707

5. Description of Materials:
RQ Hazardous Substance, Solid, N.O.S. ORM-E, NA9188 (RQ Asbestos) from renovation project friable asbestos containing material ASBESTOS, NA2212, RQ, CLASS 9

6. Containers: No. Type BA

7. Total Quantity: (cu. yd.) 25

8. Special Handling Instructions and Additional Information:

9. OPERATOR'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.

OPERATOR'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 government regulations.

Bill of Lading also applies.

Printed/Typed Name & Title: Amy M. Hammerberg
Signature: Amy M. Hammerberg
Month Day Year: 11/6/95

Transporter

10. Transporter 1 (Acknowledgment of Receipt of Materials):

Printed/Typed Name & Title: John Kuzel
Waste Management 708/395-2020
Address and Telephone No.:
22333 West Highway 173
Antioch, Illinois 60002
Signature:
Month Day Year: 11/6/95

11. Transporter 2 (Acknowledgement of Receipt of Materials):

Printed/Typed Name & Title:
Address and Telephone No.:
Signature:
Month Day Year

Disposal Site

12. Discrepancy Indication Space: Total 30 yds received. ASB006457

13. Waste Disposal Site Owner or Operator: Pheasant Run
Certification of receipt of asbestos materials covered by this manifest except as noted in item 12.

Printed/Typed Name & Title: Jennifer Klennert
Signature:
Month Day Year: 11/6/95

WHITE - Landfill CANARY - Hauler PINK - Owner

HOLIAN ASBESTOS REMOVAL
ACM - CHAIN OF CUSTODY

1. Date: 10-21-95 Truck #: #7
   Copy of Chain distributed to Shop? ✓ Shop Ok ✓
   Dumpster: #1 #2 #3 Date Placed in Dumpster 10-23-95
   (Circle One)

2. Generator: J.L. CLARK

3. Location: DOWNER'S GROVE, ILL

4. Amount of ACM removed:
   _____ linear feet _____ square feet
   other: _____

5. Number of bags (ACM) of material removed: 44-BAGS

6. ACM (GAB) disposition.
   A. To dumpster on site.
   B. To secure location on site.
   C. Removed by contractor in contractor van/truck.
   D. Temporary storage at contractor site:
      a) Designated dumpster
      b) Shared dumpster

7. Name and Location of ACM landfill:
   Winnebago Reclamation Landfill, Rockford, Illinois 61109, or;
   _____

8. Name of carrier to landfill:
   Laidlaw Waste Systems, or;
   _____

9. Date ACM transported to landfill: _____

10. Legible copy of bill of lading is enclosed.

11. Legible copy of waste ticket is enclosed.

12. Copy of waste ticket mailed:
    A. With attached invoice date: _____
    B. Under separate cover date: _____

13. Copy of waste ticket sent to:
    _____
    _____

Holian Asbestos Removal & Encapsulation Corp.

By: Greg Horton

4.05

WHITE File CANARY Operator PINK Shop

ACORD. CERTIFICATE OF INSURANCE

11/30/95

PRODUCER

:C Fackler Inc
'O Box 642810
:hicago, IL 60664-2810
312) 629-0888
312) 629-2506 fax

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.

COMPANIES AFFORDING COVERAGE

COMPANY LETTER A	Underwriters at Lloyds of London
COMPANY LETTER B	
COMPANY LETTER C	
COMPANY LETTER D	
COMPANY LETTER E	

INSURED

Holian Asbestos Removal
& Encapsulation Corp.
7504 Meyer Road
Spring Grove, IL 60081

COVERAGES

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED, NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

CO LTR	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	LIMITS	
	GENERAL LIABILITY COMMERCIAL GENERAL LIABILITY CLAIMS MADE OCCUR OWNER'S & CONTRACTOR'S PROT.		/ /	/ /	GENERAL AGGREGATE	$ 0
					PRODUCTS-COMP/OP AGG.	$ 0
					PERSONAL & ADV. INJURY	$ 0
					EACH OCCURRENCE	$ 0
					FIRE DAMAGE (Any one fire)	$ 0
					MED. EXPENSE (Any one person)	$ 0
	AUTOMOBILE LIABILITY ANY AUTO ALL OWNED AUTOS SCHEDULED AUTOS HIRED AUTOS NON-OWNED AUTOS GARAGE LIABILITY		/ /	/ /	COMBINED SINGLE LIMIT	$ 0
					BODILY INJURY (Per person)	$ 0
					BODILY INJURY (Per accident)	$ 0
					PROPERTY DAMAGE	$ 0
	EXCESS LIABILITY UMBRELLA FORM OTHER THAN UMBRELLA FORM		/ /	/ /	EACH OCCURRENCE	$ 0
					AGGREGATE	$ 0
A	WORKER'S COMPENSATION AND EMPLOYERS' LIABILITY	955566002	02/01/95	02/01/96	X STATUTORY LIMITS	
					EACH ACCIDENT	$1,000,000
					DISEASE-POLICY LIMIT	$1,000,000
					DISEASE-EACH EMPLOYEE	$1,000,000
	OTHER		/ /	/ /		0 0 0

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/SPECIAL ITEMS

CERTIFICATE HOLDER

J L Clark
2300 Wisconsin Ave.
Downers Grove, IL 60515

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING COMPANY WILL ENDEAVOR TO MAIL 30 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO MAIL SUCH NOTICE SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE COMPANY, ITS AGENTS OR REPRESENTATIVES.

AUTHORIZED REPRESENTATIVE

Max Caney

ACORD. CERTIFICATE OF INSURANCE

Id: 00051

ISSUE DATE (MM/DD/YY): 11/30/95

PRODUCER

ROSE TILLMANN INC
P.O. BOX 628
ONE MARK TWAIN PLZA #200
EDWARDSVILLE IL 62025

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.

COMPANIES AFFORDING COVERAGE

COMPANY LETTER A	COMMERCE & INDUSTRY
COMPANY LETTER B	
COMPANY LETTER C	
COMPANY LETTER D	
COMPANY LETTER E	

INSURED

AOLIAN ASBESTOS REMOVAL
504 MEYER ROAD
SPRING GROVE, IL 60081

COVERAGES

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	LIMITS	
GENERAL LIABILITY X COMMERCIAL GENERAL LIABILITY CLAIMS MADE X OCCUR. OWNER'S & CONTRACTOR'S PROT. X ASBESTOS ABATE.	AA17779472	09/13/95	09/13/96	GENERAL AGGREGATE	$ 1,000,000
				PRODUCTS-COMP/OP AGG.	$ 1,000,000
				PERSONAL & ADV. INJURY	$ 1,000,000
				EACH OCCURRENCE	$ 1,000,000
				FIRE DAMAGE (Any one fire)	$ 50,000
				MED.EXP. (Any one person)	$ 5,000
AUTOMOBILE LIABILITY ANY AUTO X ALL OWNED AUTOS X SCHEDULED AUTOS X HIRED AUTOS X NON-OWNED AUTOS GARAGE LIABILITY X ICCMC890 FILING	CA5051420RA	11/19/95	11/19/96	COMBINED SINGLE LIMIT	$ 1,000,000
				BODILY INJURY (Per person)	$
				BODILY INJURY (Per accident)	$
				PROPERTY DAMAGE	$
EXCESS LIABILITY UMBRELLA FORM OTHER THAN UMBRELLA FORM				EACH OCCURRENCE	$
				AGGREGATE	$
WORKER'S COMPENSATION AND EMPLOYERS' LIABILITY				STATUTORY LIMITS	
				EACH ACCIDENT	$
				DISEASE-POLICY LIMIT	$
				DISEASE-EACH EMPLOYEE	$
OTHER					

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/SPECIAL ITEMS

ADDITIONAL INSURED IS JL CLARK.

CERTIFICATE HOLDER

JL CLARK
2300 WISCONSIN AVENUE
DOWNERS GROVE IL

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING COMPANY WILL ENDEAVOR TO MAIL 30 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO MAIL SUCH NOTICE SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE COMPANY, ITS AGENTS OR REPRESENTATIVES.

AUTHORIZED REPRESENTATIVE

Beverly Eoselke

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Micro-Fiber Laboratories, Inc.
3394 Commercial Avenue, Northbrook, IL 60062
(708) 498-4127
1-800-373-LABS
FAX (708) 498-4453

HOLIAN ASBESTOS

(J.L. Clark, Inc., Downers Grove, Illinois, Air Monitoring and Sample Analysis Project)

7504 Meyer Road
Spring Grove, Illinois 60081

Prepared By:

Micro-Fiber Laboratories, Inc.
3394 Commercial Avenue
Northbrook, Illinois 60062
(708) 498-4127

November 30, 1995

I. PURPOSE

Mr. Jim Holian of Holian Asbestos, engaged Micro-Fiber Laboratories, Inc., to perform removal and clearance air monitoring and analyze ten (10) air samples obtained from the J.L. Clark Inc., 2300 Wisconsin Avenue, Downers Grove, Illinois, project. Technician Robert Morrell was on site on October 21, 1995.

II. OBSERVATIONS

Air monitoring pumps were placed throughout the area where the work was performed. Also three (3) clearance air samples were taken. One field blank was also collected. All pumps were calibrated before use. The sampling was completed with no problems encountered.

III. ANALYTICAL METHOD

The samples were analyzed by NIOSH Method 7400 using a microscope at 400-450 magnification with phase contrast illumination.

IV. RESULTS

Date	Sample No.	Location	Fibers Per Cubic Centimeter	Volume In Liters

See Appendix A for Asbestos Air Analysis Results

NOTE: Sample slide preparations will be retained for 30 years.

Sample cassettes will be discarded as asbestos waste after 30 days.

V. CONCLUSION

The clearance air readings were well below the 0.01 fibers per cubic centimeter level which is considered "clean air" by NIOSH a governmental agency. The 0.01 f/cc level is also used as the standard for the reoccupying of schools after an asbestos abatement project has been completed.

(This report can be reproduced in its entirety. This report relates to only the items tested and any conclusions regarding this data, other than those drawn by Micro-Fiber Laboratories, Inc., may not be valid.)

Reviewed:

Robert G. Cooley
President

Appendix A

Asbestos Air Analysis Results

Micro-Fiber Laboratories, Inc.
3394 Commercial Avenue, Northbrook, IL 60062
(708) 498-4127
1-800-373-LABS
FAX (708) 498-4453

ASBESTOS AIR ANALYSIS

SAMPLE SOURCE

Name: Holian Industries
Address: 7504 Meyers Road (Street)
Spring Grove, IL 60081 (City/State, Zip)
IL Clock Downers Grove, IL (Project)

COLLECTED BY: Robert Morrell
DATE COLLECTED: 10-21-95
DATE RECEIVED: 10-21-95
BY: Robert Morrell

☐ Baseline ☑ Removal ☐ Clearance

Sample No.	Location	Volume In Liters	Fibers Per Cubic Centimeter
1256	Blank Sample	—	0 fibers/100 fields
1257	OSHA & Hr Expo. Mike Rabelhofer 347-58-8296	63	.008
1258	Personal Sample Mike Rabelhofer 347-58-8296	441	.17

Comments:

Analyst: ANALYST (SIGNATURE) Robert Morrell Date: 10-21-95
ANALYST (PRINTED) Robert Morrell

Micro-Fiber Laboratories, Inc.
3394 Commercial Avenue, Northbrook, IL 60062
(708) 498-4127
1-800-373-LABS
FAX (708) 498-4453

ASBESTOS AIR ANALYSIS

SAMPLE SOURCE

Name: Holian Industries
Address: 7504 Meyers Road (Street)
Spring Grove, IL 60081 (City/State, Zip)
J.L. Clark Downers Grove, IL (Project)

COLLECTED BY: Robert Morrell
DATE COLLECTED: 10-21-95
DATE RECEIVED: 10-21-95
BY: Robert Morrell

☐ Baseline ☑ Removal ☐ Clearance

Sample No.	Location	Volume in Liters	Fibers Per Cubic Centimeter
1259	Center of the work area	2424	.16
1260	Outside the work area near the decon entrance	2964	.002
1261	HEPA Negative Air exhaust	552	.001
1262	Decon Unit dirty shower Sample	5145	.003

Comments:

Analyst: ANALYST (SIGNATURE) Robert Morrell Date: 10-21-95
ANALYST (PRINTED) Robert Morrell

Micro-Fiber Laboratories, Inc.
3394 Commercial Avenue, Northbrook, IL 60062
(708) 498-4127
1-800-373-LABS
FAX (708) 498-4453

ASBESTOS AIR ANALYSIS

SAMPLE SOURCE

Name: Holion Industries
Address: 7504 Meyers Road (Street)
Spring Grove, IL 60081 (City/State, Zip)
J.L. Clark Downers Grove, IL (Project)

COLLECTED BY: Robert Morrell
DATE COLLECTED: 10-21-95
DATE RECEIVED: 10-21-95
BY: Robert Morrell

☐ Baseline ☐ Removal ☑ Clearance

Sample No.	Location	Volume in Liters	Fibers Per Cubic Centimeter
1263	South side center of the work area	1452	.003
1264	Center of the work area	1452	.002
1265	Decon Unit Dirty room Sample	1452	.003

Comments:

Analyst: ANALYST (SIGNATURE) Robert Morrell Date: 10-21-95
ANALYST (PRINTED) Robert Morrell

TEM, Incorporated

NIST-NVLAP	TEM Air Samples	1130
NIST-NVLAP	Bulk Sample Analysis	1130
NIOSH-PAT	PCM Fiber Count	60126-001
AIHA-AAR	PCM Analyst	60126-001

443 Duane Street, Glen Ellyn, Illinois 60137 Phone (708) 790-0880 Fax (708) 790-0882

October 19, 1995

Mr. Tim Holian
Holian Industries
7504 Meyer Road
Spring Grove, Illinois 60081

Re: Bulk Sample Analysis: JL Clark
TEM Project 27880

Dear Mr. Holian:

The attached laboratory report summarizes the results of the polarized light microscopy analysis of the bulk samples submitted by your company. The samples were analyzed following procedures contained in the EPA's "Interim Method for the Determination of Asbestos in Bulk Insulation Samples" Part 763, Subpart F, Appendix A, EPA 40CFR Ch. 1, July 1987.

LIMITATIONS OF METHOD: The optical resolution of polarized light microscopy limits the size of fibers that are visible in a sample preparation. In samples where very small fibers may be present, such as floor tile samples, the asbestos fibers may be smaller than the resolution limit of a polarized light microscope. In those cases, the result of the PLM analysis is not conclusive where the sample is reported as non-asbestos. Samples that are expected to contain small fibers (such as floor tile samples) and that are reported as non-asbestos by PLM should be further analyzed by transmission electron microscopy.

This report applies only to samples tested.

Sincerely,
TEM, Incorporated

Rebecca Frejek
Microscopist

TEM, Incorporated

NVLAP

BULK SAMPLE ANALYSIS FOR ASBESTOS CONTENT

Project Number	27880	Date Analyzed	10/17/95
Project Name:	JL CLARK		
Client:	HOLIAN INDUSTRIES		
Client Sample I.D.	SAMPLE 1		
TEM Sample I.D.	57854		
Gross Visual Description	TAN		
Asbestos Containing:	YES		

Asbestos-form Fibers:	Estimated Percentages
1. Chrysotile	3-5
2. Amosite	
3. Crocidolite	
4. Anthophyllite	
5. Tremolite/Actinolite	
Total Asbestos	3-5
Non Asbestos Fibers	
Cellulose Paper/Wood Fibers	3-5
Glass Fibers	50-55
Non-Fibrous Binder/Fillers	35-45
Other:	

Comments DUCT INSULATION

Microscopist REBECCA FREJEK

TEM, Incorporated

NVLAP

BULK SAMPLE ANALYSIS FOR ASBESTOS CONTENT

Project Number	27880	Date Analyzed	10/17/95
Project Name:	JL CLARK		
Client:	HOLIAN INDUSTRIES		
Client Sample I.D.	SAMPLE 2		
TEM Sample I.D.	57855		
Gross Visual Description	GREY		
Asbestos Containing:	YES		

Asbestos-form Fibers:	Estimated Percentages
1. Chrysotile	5-10
2. Amosite	20-25
3. Crocidolite	
4. Anthophyllite	
5. Tremolite/Actinolite	
Total Asbestos	30-35
Non Asbestos Fibers	
Cellulose Paper/Wood Fibers	3-5
Glass Fibers	25-30
Non-Fibrous Binder/Fillers	30-40
Other:	

Comments PIPE INSULATION

Microscopist REBECCA FREJEK

HOLIAN ASBESTOS REMOVAL
& ENCAPSULATION CORP.

SAT.

DAILY LOG/ACTIVITY REPORT

DATE: 10-21-95 DAY NUMBER: #1 WEATHER: TEMPERATURE:

JOB NAME/NUMBER: J.L. CLARK

LOCATION: DOWNER'S GROVE, ILL

CLEAR ___ CLOUDY ✓ RAIN ___ SNOW ___

START 32 NOON 43 STOP 47

LEGEND: GF-GENERAL FOREMAN J-JOURNEYMAN FA-FIELD ADMINISTRATION A-APPRENTICE SF-FOREMAN

TOTAL # SKILLED: GF ___, SF ___, MECH ___, A___, FA___

TOTAL # UNSKILLED-LABORERS: J ___, A ___, HELPERS ___

TRUCK DRIVER ___

1. DESCRIPTION OF WORK DONE: SET-UP CONTAINMENT FOR REMOVAL OF ACM ON 8" PIPING & DUCTWORK.

2. CRAFTSMAN & EQUIPMENT EMPLOYED: 2-600 CFM NEG. AIR UNITS. 2-8' LADDERS/1-6' LADDER/1-AIRLESS SPRAYER/1-SHOWER FILTRATION UNIT

3. MATERIAL DELIVERED: 60"X60" GLOVEBAGS/ACM BAGS 2" & 3" DUCT TAPE/SILVER TAPE/4-MIL POLY/SUITS

4. SUB-CONTRACTORS ON JOB: NONE

5. INSPECTIONS MADE: VISUAL. (BOB FROM MICRO-FIBER LAB'S DID FINAL VISUAL.

6. TESTS PERFORMED: BOB FROM MICRO-FIBER LAB'S RAN AREA, PERSONAL, AND FINAL AIR SAMPLES.

7. UNUSUAL CONDITIONS OR PROBLEMS: NONE

8. STATUS AT QUITTING TIME: ALL DONE/EVERYTHING OUT.

BY: [signature]

4.04

State of Illinois A043377
Department of Public Health
LICENSE, PERMIT, CERTIFICATION, REGISTRATION
ASBESTOS PROFESSIONAL LICENSE

EXPIRATION DATE	CATEGORY	I.D. NUMBER
05/15/96	5319	100-4375

GREG HOUSTON

SUPERVISOR

THE PERSON, FIRM OR CORPORATION WHOSE NAME APPEARS ON THIS CERTIFICATE HAS COMPLIED WITH THE PROVISIONS OF THE ILLINOIS STATUTES AND/OR RULES AND REGULATIONS AND IS HEREBY AUTHORIZED TO ENGAGE IN THE ACTIVITY INDICATED ON THE FACE OF THIS CARD.

ISSUED UNDER THE AUTHORITY OF
STATE OF ILLINOIS
DEPARTMENT OF PUBLIC HEALTH

SIGNATURE OF LICENSEE

State of Illinois A043377
Department of Public Health

LICENSE, PERMIT, CERTIFICATION, REGISTRATION

The person, firm or corporation whose name appears on this certificate has complied with the provisions of the Illinois Statutes and/or rules and regulations and is hereby authorized to engage in the activity as indicated below.

JOHN R. LUMPKIN, M.D.
DIRECTOR

Issued under the authority of
The State of Illinois
Department of Public Health

EXPIRATION DATE	CATEGORY	I.D. NUMBER
05/15/96	5319	100-4375

GREG HOUSTON

SUPERVISOR

BUSINESS ADDRESS

GREG HOUSTON
5701 MILL ST. P. O. BOX 394
RICHMOND IL 60071

THIS LICENSE IS NOT VALID IF YOUR IDPH
REFRESHER COURSE CERTIFICATE IS NOT CURRENT

Printed by Authority of the State of Illinois • 2/91 •

State of Illinois A039098
Department of Public Health
LICENSE, PERMIT, CERTIFICATION, REGISTRATION
ASBESTOS WORKER LICENSE

EXPIRATION DATE	CATEGORY	I. D. NUMBER
02/01/96	057	057012379

GREGORY L. HOUSTON
ASBESTOS WORKER LICENSE
THIS LICENSE IS NOT VALID IF YOUR
COURSE CERTIFICATE IS NOT CURRENT.

THE PERSON, FIRM OR CORPORATION WHOSE NAME A... ON THIS CERTIFICATE HAS COMPLIED WITH THE PRO... OF THE ILLINOIS STATUTES AND/OR RULES AND REGULA... AND IS HEREBY AUTHORIZED TO ENGAGE IN THE AC... INDICATED ON THE FACE OF THIS CARD.

ISSUED UNDER THE AUTHORITY OF
STATE OF ILLINOIS
DEPARTMENT OF PUBLIC HEALTH

SIGNATURE OF LICENSEE

Rob Moreau

Jim Klotz

Gordon Verweyst, Dick Anderson

J.L. CLARK - Atlas Tube Division

Asbestos Survey

Attached is a proposal from Aerosol Monitoring and Analysis, Inc. for an asbestos survey at Atlas Tube.

We have reviewed the program and find it well organized in content. This would fully evaluate our liabilities with respect to asbestos for this plant. With the upcoming work on the incinerator, this evaluation would be prudent to avoid any exposure to our employees or a contractor's employees during the construction. This survey would reveal any asbestos in the plant and give us the foundation for any abatement work that might be necessary.

The proposed cost, not to exceed $4555, is competitive within the industry. It would be beneficial for us to provide someone to be present as the survey is performed for any questions that may arise later. Please review the attached program and advise the course of action that should be followed.

JKK:vgr

TECHNICAL AND COST PROPOSAL
FOR
J.L. CLARK
2300 Wisconsin Avenue
Downers Grove, Illinois 60515

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Aerosol Monitoring & Analysis, Inc.
An AIHA Accredited Laboratory

January 25, 1988

J. L. Clark
2300 Wisconsin Avenue
Downers Grove, Illinois 60515

Dean E. Dodson

During the past decade, there has been a clear identification of the link between the inhalation of asbestos fibers and pulmonary disorders, namely asbestosis and mesothelioma. However, the mere presence of asbestos in a building does not mean that the health of the occupants is necessarily endangered. As a result, AMA, Inc. has developed a systematic approach used by governmental, commercial and industrial enterprises when undertaking programs to identify and inventory asbestos-containing materials within their facilities and to determine the most appropriate corrective actions to minimize and employee exposure.

Aerosol Monitoring & Analysis, Inc. has provided asbestos related technical and design services for government agencies, utility companies, hospitals, school boards, universities and private industry on over 2,000 asbestos projects both in the United States and abroad. These services have been responsible for fulfilling the following accomplishments:

* 80 million square feet of building space surveyed in over 1,000 facilities.

* Cost estimates for over 60 million dollars worth of asbestos abatement work.

* Laboratory analysis of over 50,000 asbestos air and bulk samples.

* Environmental monitoring and management for over 1,000 asbestos abatement projects.

In light of this vast amount of experience our firm is more than capable of providing the required services.

280 Howard Street • Des Plaines, IL 60018 • (312) 390-7720

The following sections present in detail, the specific components and methodologies followed by AMA, Inc. when accomplishing documentation and environmental monitoring programs.

AMA is committed to offering our clients the highest quality of service available. It is our corporate policy to recruit individuals who have achieved a four year science degree. AMA will submit all required documentation to our clients within a reasonable time period.

Sincerely,

AEROSOL MONITORING & ANALYSIS, INC.

Frank D. Ayers
Manager, Chicago Division

SECTION II - BUILDING DOCUMENTATION REVIEW

Building Familiarization

Aerosol Monitoring & Analysis, Inc. will review all available building construction documentation for the J.L. Clark. This review of documentation will include, but not be limited to the following:

a. All construction, maintenance and renovation documents (i.e., specifications, plans, blueprints, diagrams, sketches etc.) provided by J.L. Clark.

b. All relevant product submittals, correspondence and purchase orders provided by J.L. Clark.

c. On-site preliminary inspections and review of facility maintenance files.

The information identified in items "a", "b", and "c" above will be catalogued and summarized for use in the development and facilitation of other program areas.

Documentation of Previous Inspections, Sampling and Abatement Work (If Applicable)

AMA, Inc. will note and record all previous inspections, sampling and abatement work for asbestos-containing materials. For each activity the following information will be obtained and documented to the maximum extent possible using the information in the files of each facility.

a. Location of abatement effort (by system and component).

b. Type of asbestos product abated.

c. Abatement personnel (in-house vs. contractor).

d. Inspection report for each completed project (if available).

e. Availability and locations of bulk and air samples.

f. Analytical reports for samples collected during abatement projects.

g. Documentation of all samples collected prior to abatement projects.

Information Integration with Program Requirements

All previously conducted asbestos sampling and analytical results as well as previously accomplished abatement activities will be integrated into the overall survey plan requirements. The purpose of this effort is to take full advantage of all existing information and to eliminate duplicate/redundant survey efforts.

SECTION III - ON-SITE SURVEY

General

Subsequent to the completion of the records review and schedule approval, the on-site building surveys will be initiated.

It should be recognized that the on-site building surveys are the most important element in any asbestos survey and identification program. The critical factor is to collect the right kind and enough of the proper information to fulfill the project objectives for identification, documentation and remedial action planning.

The planning, staffing and management of this program is the most crucial element for the successful and timely completion of this project.

Inspection Approach

Inspections will be conducted using a systems approach. In the system approach, the individual components of each system are surveyed as one unit. This particular approach is the most compatible with the type of equipment engineering and design documentation generally available.

The areas that will be inspected for asbestos-containing materials will include but not be limited to:

a. Rooms, hallways and office space.
b. Mechanical equipment rooms.
c. Pipe chases
d. Basements and tunnels.
e. Above ceiling.
f. Stairwells.
g. Accessible storage areas.
h. Loading facilities.
i. Maintenance and machine shops.
j. Air handling systems.

Areas where access is virtually impossible will be identified on the system/building design documentation and a notation provided as to why the area(s) could not and should not be investigated further.

Inspection Protocol

The survey team will locate, sample, describe and document the conditions of all potentially asbestos-containing materials which have not been previously identified.

Materials will be described by locations and the type of material (based on function), i.e., wrapped pipe or duct insulation, boiler lagging, structural fire protection, etc. Additional information on physical characteristics to be collected by the inspection team will include the following:

a. Condition of material including friability and non-friability. Designate level of friability (high, moderate, low). Damage, previous impact history, repair or maintenance activity, and severity (severe, moderate, minor) will also be evaluated and recorded.

b. Locations and accessibility in terms of exposure to operational and/or maintenance staff.

c. Estimates of the extent of the material including lengths, widths, (diameters), area, thickness and volume of material.

d. Composition of the asbestos-containing material, including any unique physical characteristics, type of asbestos and other available information relevant to the identification of the manufacturer and/or installer of the material. This information will include color, hardness, texture, size, markings, imprinting, existence and description of metal straps, coverings or other unique features.

In terms of exposure assessment and useful life of the existing material, the following information will also be collected by the survey team:

a. Air movement/circulation patterns in the vicinity of the material.

b. Proximity to or directly subjected to vibration.

c. Presence and extent of debris or gross residue in the area and overall presence of potential asbestos-containing dust.

d. Possibility of future damage to the material by maintenance, delamination, deterioration or water/steam leakage.

The survey team will document the location, type, amount and condition of all suspect asbestos-containing materials. The location of these materials is to be recorded on copies of available construction engineering and system generating documentation provided by J.L. Clark. Should architectural services be required to generate adequate drawings for proper survey documentation, these services shall be contracted for on a separate basis. These sketches will be permanent line drawings of sufficient detail to adequately locate the asbestos-containing materials. These drawings will be numbered in sequence to facilitate their retrieval.

Bulk Sampling Protocol

Representative bulk sampling of all suspected asbestos-containing materials shall be conducted and reported on inspection data forms developed by AMA, Inc. A minimum of one sample per 5,000 square feet of building space will be collected. Both friable and non-friable materials will be sampled.

All areas sampled shall be clearly identified on copies of available engineering documentation and marked with an identification number corresponding to the representative samples.

Materials to be Sampled

Samples shall be collected for each distinct type of potentially asbestos-containing material to determine and identify its actual asbestos content. Type distinction shall be based on the following criteria:

a. Visual appearance
b. Texture and hardness
c. Functional use including but not limited to: ceiling, walls, boilers, tanks, furnaces, other mechanical equipment, ceiling tiles, pipe insulation, elbows, valves structural members - decks and beams, duct work and fire doors.
d. Information provided by documents or interviews as to prior renovation or patchwork.

Selection of Sampling Locations

Sampling locations will be in unobtrusive, minimum access areas. All efforts will be made to collect bulk samples from previously exposed/damaged areas thereby minimizing damage to existing intact materials.

Bulk Sampling Size

Bulk sample size will be in accordance with the following criteria:

a. Samples will be collected of a sufficient volume and depth to penetrate all layers, if distinct layers are present. Each sample will be at least four cubic centimeters in volume.

b. All samples will be sealed in tamper-proof containers and the chain-of-custody process is initiated.

c. When dust or particulate debris is encountered on surfaces in the immediate proximity of friable, potentially asbestos-containing material, such dust or particulate debris will be sampled at the discretion of the survey team supervisor.

Marking of Asbestos-Containing Material Areas (Optional)

Upon laboratory analysis of the collected samples, those areas/ materials determined to contain greater than one percent asbestos will be clearly marked. Marking will consist of a stenciled application of oil based paint on these materials. The marking will be of sufficent size and spacing to permit easy reading and detection by maintenance, operational personnel, and other building occupants. This procedure is optional and would be instituted only at the direction of J.L. Clark.

Sample Submissions

The samples will be received by our laboratory for analysis no later than 72 hours after collection. Sample results will be available in a timely manner. All sample submissions will include proper chain-of-custody documentation as described below.

Chain-of-Custody Documentation

For the collection and submittals of samples, the survey team will prepare and retain documentation that accurately reflects all changes of possession and location of each sample. Such documentation shall indicate all persons who take custody of samples and the period of time in each individual's custody, as well as to whom samples were relinquished. There shall be no unaccounted period of time with regard to any sample.

SECTION IV - LABORATORY ANALYSIS

Sample Analytical Protocols and Reporting Requirements

All bulk samples will be analyzed to identify the type and amount of asbestos present within the sample as well as other material components. Samples shall be analyzed using the EPA Interim Method for the Determination of Asbestos in Bulk Insulation Samples (EPA-600/M4-82-020).

Each bulk sample analyzed will include the following reporting parameters:

a. Dates collected, received by the lab and analyzed.
b. All field and lab sample numbers.
c. All chain-of-custody and evidence transfer information.
d. General and specific location of sampled area.
e. Gross description of sample.
f. Color and appearance description of sample.
g. Percentage asbestos content of each type of asbestos identified and total asbestos content of material to a detection limit of greater than one percent.
h. Percentage content and characterization of non-asbestos fibrous material.
i. Percentage content of non-asbestos non-fibrous material.
j. Description of analytical method.
k. Description of analyst training.
l. Signature of analyst.

Sample Retention

All samples analyzed by the laboratory will be retained for a period of 30 years. Any changes in storage location or conditions will be made only after prior notification has been made.

Additional Analytical Capabilities

Electron microscopy, either scanning electron microscopy with dispersive x-ray capabilities or transmission electron microscopy equipped with x-ray capabilities will be available if required for quality control purposed or in cases where confirmatory analysis of controversial samples is required. AMA, Inc. has the in-house capability to provide analyses using electron microscopy.

SECTION V - PROJECT DOCUMENTATION (FINAL REPORT)

General

The effectiveness of attaining the project goals with most readily be determined by the completeness, accuracy and utility of the project documentation. All documentation is the responsibility of the Project Industrial Hygienist. Comprehensive project documentation will include exposure potential assessments, acute exposure reports, corrective action planning, abatement cost estimates, future program management costs and record drawings.

Exposure Potential Assessment

Concurrent with measuring the quantities and extent of all asbestos-containing materials, priorities relative to need for performing corrective actions will be established.

A simple "Present" or "Absent", "High" or "Low" rating will be used to establish an abatement priority. more elaborate ranking systems have been tried, and have met with mixed success. EPA does not recommend assigning numerical ratings to assessment factors and combing them into a single score.

AMA, Inc. will use the ranking system with the express purpose of controlling asbestos-containing materials by establishing priorities. The ranking system will permit J.L. Clark to prioritize its resources and to direct those resources for asbestos abatement within its budgetary and scheduling constraints. The ranking system will not be used exclusively to select a particular corrective action. There are several situations which greatly outweigh the factors contained in the system, and should automatically be dealth with on a high priority basis:

a. Asbestos-containing meterials, regardless of condition, located in an area scheduled for renovation or other construction activity.

b. Routine maintenance operations which could either directly disturb friable asbestos materials, or surfaces which are potentially contaminated with asbestos fallout or debris (i.e., removing ceiling tiles, changing lights, servicing HVAC equipment or installing new cables).

c. Friable sprayed-on materials which are located above a ceiling, and the ceiling space is an active return air plenum for the HVAC systems.

d. Exposed friable insulation in sensitive, occupied or high cleanliness area (including equipment insulation where the protective outer wrapping is damaged).

Potential Acute Exposure Situation Identification

During the on-site inspections, the survey team will identify all areas where asbestos-containing materials exist in a condition and/or location having the potential to create an acute exposure hazard to any individuals occupying these areas on either a permanent or temporary basis, and, in the inspector's professional opinion, require immediate attention. Such criteria used by the survey team to determine acute exposure hazards will include those parameters previously described in paragraphs 1-a, b, c, and d.

It is the responsibility of the survey team to report all potential acute exposure hazards identified during the survey to J. L. Clark within twenty-four hours of discovery, together with a recommendation of the preferred abatement alternative.

Corrective Action Planning

Upon completion of the On-Site Survey and sample analysis, the acquired data will be evaluated in order to develop the most cost effective asbestos management strategy for each asbestos condition identified. The corrective action plan will be developed utilizing the previously described priority ranking system for asbestos-containing material within the facility. The corrective action alternatives selected in lieu of removal, with proper maintenance and attention, will serve to have a near equivalent abatement effect to that of removal. This may include encapsulation, enclosure, or deferred action in limited access areas or those areas subject to minimal damage and/or maintenance activities.

Abatement Cost Estimates

Aerosol Monitoring & Analysis, Inc. will provide to J. L. Clark abatement cost estimates which will include both interim and permanent abatement cost including cost of removal. The cost estimate will include each different type of asbestos-containing material identified within an area as well as associated costs for management of J. L. Clark asbestos-containing materials remaining at each facility. When J. L. Clark indicates to AMA, Inc. the likelihood of a future renovation, AMA, Inc. will identify the asbestos abatement costs associated with the proposed renovation.

ASBESTOS PROJECTS

PROJECT NAME	RESPONSIBILITY
Architect of the Capitol Washington, D.C. Contact: Mr. Raymond Carroll (202) 225-4781	*Asbestos survey of 17 buildings located on Capitol Hill *Asbestos hazard assessment *Asbestos worker training *Development and implementation of complete asbestos program *Asbestos abatement project supervision *Laboratory analysis on-site analysis and TEM required
General Services Administration GAO Building 441 G Street, NW Washington, D.C. Contact: Mr. Terry DeBiase (202) 275-0180	*Asbestos survey 1.3 million square foot facility *Preparation of contract drawings *Prepartation of abatement guidelines *Asbestos air sampling, analysis and consultation before, during and after asbestos work
Voice of America Rhodes and Kavalle Greece Contact: Mr. Mike Smith (202) 485-8000	*Asbestos hazard evaluation *Environmental monitoring *PCB Evaluations
Veteran's Administration Medical Center Perry Point, MD Contact: Mr. Eric Fitchett (301) 642-2411	*Asbestos survey of 200 buildings *Preparation of abatement guidelines *Sampling, analysis, and consulation during asbestos removal (on-site analysis required)
Johns Hopkins University Baltimore, Maryland Contact: Mr. Lee Bredbenner (301) 338-8060	*Asbestos program management and design *Industrial hygiene consulting *Laboratory analysis - Transmission Electron Microscopy *On-site analysis required
U.S. Army Corp of Engineers Anchorage, Alaska Contact: Mr. Randall Jacobs (907) 758-2820	*Asbestos survey of 33 buildings *Abatement cost estimates *Hazard assessment and abatement recommendations
Whiting & Turner, Inc. Baltimore, Maryland Contact: Mr. Kimmons (301) 583-5412	*Asbestos survey for various asbestos abatement projects in the Baltimore area *Preparation of contract drawings and specifications *Asbestos abatement project management *Laboratory analysis on-site analysis and TEM required

AT&T Technologies Baltimore, Maryland Contact: Mr. John Woodland (301) 563-8854	*Asbestos survey of 2.7 million square foot facility *Asbestos training *Asbestos air and bulk sample analysis *Asbestos abatement project monitoring and supervision *Complete industrial hygiene services
AAI Corporation Cockeysville, MD 21030 Contact: Ms. Randi Glass (301) 628-3612	*Asbestos survey of 12 buildings *Asbestos training *Asbestos air and bulk sample analysis *Asbestos abatement project monitoring and supervision
C&P Telephone Company 1 E. Pratt Street Baltimore, MD Contact: Mr. Bob Washington (301) 393-4808	*Asbestos air and bulk sample analysis *Air sampling and supervision during asbestos abatement projects *Industrial hygiene sampling and consultation involving a wide variety of suspected hazards
Greater Baltimore Medical Center Towson, Maryland 21204 Contact: Mr. Phillip O'Marrah (301) 828-2171	*Asbestos survey of the entire hospital *Prepared hazard assessment audit *Development and implementation of a complete asbestos program *Abatement cost estimating
State of West Virginia Health Department Contact: Mr. Ed Light (304) 348-7871	*Asbestos bulk sample analysis *Training of 60 health department inspectors to conduct asbestos building surveys
General Motors Corporation Baltimore, Maryland Contact: Mr. Earl Shiflett (301) 955-9203	*Asbestos survey of 3.0 million square foot facility *Preparation of complete asbestos drawings *Asbestos sampling and analysis *Asbestos training
Veterans Administration Ft. Howard, Maryland Contact: Mr. Joseph Stevenson (301) 477-1800	*Asbestos building surveys *Preparation of contract drawings *Preparation of abatement guidelines *Abatement cost estimating
W.R. Grace Company Baltimore, MD Contact: Mr. Roger Cole (301) 355-4900	*Asbestos survey of 43 buildings *Preparation of hazard assessment *Asbestos abatement project management

Proposal

AEROSOL MONITORING & ANALYSIS, INC.
280 Howard Street
DES PLAINES, ILLINOIS 60018
(312) 390-7720

FDA-098-88

January 25, 1988

J.L. Clark
2300 Wisconsin Avenue
Downers Grove, Illinois 60515

(312) 969-6100

Attention: Dean E. Dodson

* Ambient Air Samples (TEM) 4 @ $350.00	$ 1,400.00
On-Site Work (NOTE: Saturday & Sunday hours)	
Industrial Hygienist	
12 hours @ $50.00/hour	$ 600.00
Industrial Hygiene Associate	
12 hours @ $45.00/hour	$ 540.00
Bulk Sample Analysis by AIHA Accredited Laboratory	
60 @ $25.00/sample	$ 1,500.00
Documentation	
Industrial Hygienist	
8 hours @ $40.00/hour	$ 320.00
Industrial Hygiene Associate	
3 hours @ $35.00/hour	$ 105.00
Certified Industrial Hygiene Review	
2 hours @ $60.00/hour	$ 120.00
NOT TO EXCEED TOTAL	$ 4,585.00

* NOTE: Samples to be taken during on-site work

WE PROPOSE to furnish labor and material — complete in accordance with above specifications, and subject to conditions found on both sides of this agreement, for the sum of:

NTE dollars ($ 4,585.00 NTE).

Payment to be made as follows: Net 30 Days

ACCEPTED. The above prices, specifications and conditions are satisfactory and are hereby accepted. You are authorized to do the work as specified. Payment will be made as outlined above. (Read reverse side).

Date of Acceptance _____

By _____

By _____

Respectfully submitted,

AEROSOL MONITORING & ANALYSIS, INC.

By Frank D. Ayers

Note: This proposal may be withdrawn by us if not accepted within 30 *days.*

Aerosol Monitoring & Analysis, Inc.

An AIHA Accredited Laboratory

280 Howard Street
Des Plaines, IL 60018
(312) 390-7720

To:

Date:

Project No.:

Sample:

CERTIFICATE OF ANALYSIS

This report applies only to the sample, or samples, investigated and is not necessarily indicative of the quality or condition of apparently identical or similar products. As a mutual protection to clients, the public and these Laboratories, this report is submitted and accepted for the exclusive use of the client to whom it is addressed and upon the condition that it is not to be used, in whole or in part, in any advertising or publicity matter without prior written authorization from these Laboratories.

Aerosol Monitoring & Analysis, Inc.

An AIHA Accredited Laboratory

BULK SAMPLING SURVEY SHEET

Contact Person: _____

Company: _____

Telephone Number: _____

Samples Taken By: _____

Sampling Witnessed By: _____

Date/Time Received by Lab: _____

Date Collected:

Job Site:

Project No.: _____ Work Order No. _____

When Needed: _____

Sample No.	Type of Material Sampled	Sample Location	Friable	Condition of the Material	Accessibility	Photo	Comments
			☐ Yes ☐ No ☐ Potentially	☐ Good ☐ Fair ☐ Poor	☐ Low ☐ Med ☐ High	☐ Yes ☐ No # _____	
			☐ Yes ☐ No ☐ Potentially	☐ Good ☐ Fair ☐ Poor	☐ Low ☐ Med ☐ High	☐ Yes ☐ No # _____	
			☐ Yes ☐ No ☐ Potentially	☐ Good ☐ Fair ☐ Poor	☐ Low ☐ Med ☐ High	☐ Yes ☐ No # _____	
			☐ Yes ☐ No ☐ Potentially	☐ Good ☐ Fair ☐ Poor	☐ Low ☐ Med ☐ High	☐ Yes ☐ No # _____	
			☐ Yes ☐ No ☐ Potentially	☐ Good ☐ Fair ☐ Poor	☐ Low ☐ Med ☐ High	☐ Yes ☐ No # _____	

_____

Analyst Technician/Time/Date

OMB Approval No. 3090-0029

STANDARD FORM (SF) 255
Architect-Engineer Related Services for Specific Project

1. Project Name / Location for which Firm is Filing:

2a. *Commerce Business Daily* Announcement Date, if any:

2b. Agency Identification Number, if any:

3. Firm (or Joint-Venture) Name & Address

Aerosol Monitoring & Analysis, Inc.
P.O. Box 687
Hunt Valley, Maryland 21030
(Corporate Office)

212 E. Main Street
Suite 218
Salisbury, Maryland 21801
(Delmarva Division)

4475 Forbes Lane
Lanham, Maryland 20706
(Washington D.C. Metropolitan Area)

280 Howard Street
Des Plaines, Illinois, 60018
(Midwest Division)

3a. Name, Title & Telephone Number of Principal to Contact

Michael J. Cirri, President
(301) 785-5615

3b. Address of office to perform work, if different from Item 3

4. Personnel by Discipline: (List each person only once, by primary function.)

4	Administrative		Electrical Engineers		Oceanographers
	Architects		Estimators		Planners: Urban/Regional
	Chemical Engineers		Geologists		Sanitary Engineers
	Civil Engineers		Hydrologists		Soils Engineers
	Construction Inspectors		Interior Designers		Specification Writers
	Draftsmen		Landscape Architects		Structural Engineers
	Ecologists		Mechanical Engineers		Surveyors
	Economists		Mining Engineers		Transportation Engineers

1	Environmental Engineer
2	Certified Industrial Hyg.
1	Certified Toxicologist
10	Industrial Hygienist
13	Industrial Hygiene Associate
2	Electron Microscopist
1	Training Director
4	Laboratory Personnel
11	Clerical
50	Total Personnel
1	Training Consultant

5. If submittal is by JOINT-VENTURE list participating firms and outline specific areas of responsibility (including administrative, technical and financial) for each firm: (Attach SF 254 for each if not on file with Procuring Office.)

5a. Has this Joint-Venture previously worked together? ☐ yes ☐ no

7. Brief resume of key persons, specialists, and individual consultants anticipated for this project.

a. Name & Title: Bruce E. Lippy, Certified Industrial Hygienist (#3023) Vice President of Operations	a. Name & Title: George S. Reichenbach, Jr. Certified Industrial Hygienist (#51) Laboratory Director
b. Project Assignment: Senior Project Manager	b. Project Assignment: Laboratory Director
c. Name of Firm with which associated: Aerosol Monitoring & Analysis, Inc.	c. Name of Firm with which associated: Aerosol Monitoring & Analysis, Inc.
d. Years experience: With This Firm 3 With Other Firms 9	d. Years experience: With This Firm 3 With Other Firms 39
e. Education: Degree(s) / Year / Specialization B.A./Biology/Western Maryland College/1973 M.S./Environmental Science/George Washington University/Candidate	e. Education: Degree(s) / Years / Specialization B.S./Applied Chemistry/Catholic University/1940 M.S./Industrial Hygiene/Harvard University/1947
f. Active Registration: Year First Registered/Discipline Full Member - American Industrial Hygiene Association, 1983 State of Maryland - Certified Asbestos Instructor State of Illinois - Certified Asbestos Instructor	f. Active Registration: Year First Registered/Discipline Registered Chemical Engineer, 1947 American Board of Engineers, 1962 Full Member - American Industrial Hygiene Association
g. Other Experience and Qualifications relevant to the proposed project: Mr. Lippy has extensive experience in the design and implementation of numerous asbestos monitoring and management programs. Mr. Lippy has been responsible for developing and supervising asbestos management programs for hospitals, school systems, industrial facilities and government installations. Examples of recent accomplishments include preparation of comprehensive asbestos management programs for Voice of America facilities in Greece and the U.S. Naval Hospital in Terceira, Azores. As V.P. of Operations at Aerosol Monitoring & Analysis, Inc. Mr. Lippy is responsible for coordinating and directing a staff of 23 Industrial Hygienists and Technicians. Mr. Lippy's previous experience with Maryland Occupational Safety and Health compliments his expertise in the practice of Industrial Hygiene. Mr. Lippy is currently lecturing on asbestos related topics for the National Asbestos Council (NAC), American Wall & Ceiling Industry (AWCI) and the Maryland Safety Council.	g. Other Experience and Qualifications relevant to the proposed project: Mr. Reichenbach has been actively involved in asbestos related issues for many years. As an industrial hygienist with the Research Triangle Institute, Mr. Reichenbach was involved in drafting the NESHAP and OSHA standards which govern asbestos. As Laboratory Director, Mr. Reichenbach oversees all laboratory analysis, equipment calibration and recordkeeping in the three company laboratories. Additionally, he is charged with insuring quality assurance through stringent Laboratory Quality Control Programs. Publications Reichenbach, George S., Jr., "Exhaust Plenums for Mist Control," Archives of Environmental Health, March 1963. Reichenbach, George S., Jr., "Ventilation for Ship Construction and Repair," Heating and Ventilating, January 1954. Reichenbach, George S., Jr., and Allen D. Brandt, "Control of Multiple Source Hazard of Carbon Monoxide," Heating and Ventilating, October 1952.

7. Brief resume of key persons, specialists, and individual consultants anticipated for this project.

a. Name & Title: Kent Baughn Industrial Hygiene Manager	a. Name & Title: Cheryl Mazzella Manager Baltimore Office
b. Project Assignment: Project Industrial Hygienist	b. Project Assignment: Project Industrial Hygienist
c. Name of Firm with which associated: Aerosol Monitoring & Analysis, Inc.	c. Name of Firm with which associated: Aerosol Monitoring & Analysis, Inc.
d. Years experience: With This Firm 4 With Other Firms 1	d. Years experience: With This Firm 2 With Other Firms ___
e. Education: Degree(s) / Year / Specialization B.S./Industrial Hygiene/Clarkson University/1984	e. Education: Degree(s) / Years / Specialization B.S./Industrial Hygiene/Clarkson University/1984
f. Active Registration: Year First Registered/Discipline Member, American Industrial Hygiene Association, 1983 NIOSH - Evaluating Asbestos Dust, 1984	f. Active Registration: Year First Registered/Discipline Member, American Industrial Hygiene Association, 1985 NIOSH, Evaluating Asbestos Dust, 1985
g. Other Experience and Qualifications relevant to the proposed project: Mr. Baughn has specialized training and experience in conducting asbestos identification surveys and managing asbestos abatement projects. Mr. Baughn managed all abatement activity, for a one year period at the General Accounting Office in Washington, D.C. Additionally, he completed a comprehensive asbestos survey of Tyson's Corner Mall in McLean, Virginia. Mr. Baughn is currently responsible for managing the asbestos program for the entire Capital Hill Complex in Washington, D.C.. Mr. Baughn has successfully completed the Georgia Technical University program, Supervision of Asbestos Abatement Contracts, and has conducted asbestos training programs himself. He has supervised over $5,000,000.00 of asbestos abatement work as an Industrial Hygienist at Aerosol Monitoring & Analysis, Inc.	g. Other Experience and Qualifications relevant to the proposed project: Ms. Mazzella has specialized training and experience in conducting asbestos identification surveys and managing asbestos abatement projects. Recently, Ms. Mazzella completed a comprehensive survey of the Greater Baltimore Medical Center, in addition to directing all abatement activities at Springfield State Hospital, Maryland for a seven month period. She has developed extensive experience in completing American Hospital Association asbestos litigation recovery documents for many hospitals. As Industrial Hygiene Manager, Ms. Mazzella is responsible for reviewing all technical reports and sampling data.

7. Brief resume of key persons, specialists, and individual consultants anticipated for this project.

a. Name & Title: Paul J. Miller
Environmental Engineer

b. Project Assignment: Project Engineer

c. Name of Firm with which associated:

Aerosol Monitoring & Analysis, Inc.

d. Years experience: With This Firm 1 With Other Firms 3

e. Education: Degree(s) / Year / Specialization

B.S./Civil and Environmental Engineering/Clarkson College/1983

f. Active Registration: Year First Registered/Discipline

1983/New York State Certified Intern Engineer (E.I.T.)

g. Other Experience and Qualifications relevant to the proposed project:

As Project Coordinator at General Electric, Mr. Miller was responsible for the organization and administration of construction projects throughout the Philadelphia area. He has successfully managed the Smith Kline Beckman Reconsolidation II project worth over 2 million dollars, while coordinating the department projects worth over 5 million dollars.

Since his arrival at Aerosol Monitoring & Analysis, Inc., Mr. Miller has provided engineering services for a number of clients:

*Baltimore County School District
*Baltimore City School District
*Prince Georges County
*Norfolk Naval Base

Mr. Miller is heading up the Architect and Engineering Department in our corporate headquarters.

a. Name & Title: Greg Willey
Manager Metropolitan Washington Division

b. Project Assignment: Project Manager

c. Name of Firm with which associated:

Aerosol Monitoring & Analysis, Inc.

d. Years experience: With This Firm 3 With Other Firms 8

e. Education: Degree(s) / Years / Specialization

B.A./Biology Salisbury State University

f. Active Registration: Year First Registered/Discipline

NIOSH Evaluation Asbestos Dust - 1984
State of Maryland - Certified Asbestos Instructor

g. Other Experience and Qualifications relevant to the proposed project:

As Division Manager at AMA, Inc., Mr. Willey has extensive experience in supervising asbestos abatement projects throughout the Maryland, Delaware and Virginia. Mr. Willey has personally analyzed thousands of asbestos air and bulk samples in our laboratory.

Among Mr. Willey's accomplishments are providing comprehensive asbestos related services for:

*Wicomico County Schools
*Talbot County Schools
*Caroline County Schools
*Milford School District
*Dorchester Board of Education
*Delmarva Power & Light
*Dover Air Force Base
*Kent General Hospital
*Peninsula General Hospital
*Georgetown Armory
*Capital School District

Mr. Willey currently supervises AMA's Metro D.C. Division where he oversees the operations of our Electron Microscope Department.

7. Brief resume of key persons, specialists, and individual consultants anticipated for this project.

a. Name & Title: Richard H. Serra, Jr. Industrial Hygienist	a. Name & Title: Daniel Twilley Director of Training
b. Project Assignment: Industrial Hygienist	b. Project Assignment: Training Coordinator
c. Name of Firm with which associated: Aerosol Monitoring & Analysis, Inc.	c. Name of Firm with which associated: Aerosol Monitoring & Analysis, Inc.
d. Years experience: With This Firm 2 With Other Firms 3½	d. Years experience: With This Firm 3 With Other Firms 10
e. Education: Degree(s) / Year / Specialization B.S./Environmental Science/University of Maryland (1981)	e. Education: Degree(s) / Years / Specialization A.S./Catonsville Community College
f. Active Registration: Year First Registered/Discipline - Registered Environmental Sanitarian with the State of Maryland - Member, American Industrial Hygiene Association, 1986 - NIOSH - Evaluating Airborne Asbestos Dust, 1985	f. Active Registration: Year First Registered/Discipline NIOSH Evaluating Asbestos Dust - 1985 State of Maryland - Certified Asbestos Instructor State of Illinois - Certified Asbestos Instructor
g. Other Experience and Qualifications relevant to the proposed project: - Mr. Serra has specialized training and experience in conducting asbestos identification surveys and asbestos abatement projects. - Mr. Serra has previous experience in hazardous waste management, pollution control and safety with a small manufacturing firm. - Mr. Serra has previous experience with the Baltimore City Health Dept. in air pollution control, industrial hygiene investigations and environmental health studies. - Mr. Serra has served as the primary consultant to the Homewood Campus of the Johns Hopkins University in Baltimore, Maryland for the past year. (1986-87) - Mr. Serra completed a comprehensive asbestos identification survey of Carroll County General Hospital, in addition to directing all asbestos abatement activities there from February - June 1986.	g. Other Experience and Qualifications relevant to the proposed project: Mr. Twilley was responsible for the development and production of the asbestos training programs approved by the States of Maryland, Illinois and Alaska. To date, he has trained over 3,500 individuals nationwide to safely work with asbestos. Mr. Twilley provided training programs and seminars to governmental agencies, military facilities, utilities and contractors. In addition to the accomplishments in the area of training, Mr. Twilley has extensive experience in asbestos abatement project management.

8. Work by firm or joint-venture members which best illustrates current qualifications relevant to this project (list not more than 10 projects).

a. Project Name & Location	b. Nature of Firm's Responsibility	c. Project Owner's Name & Address	d. Completion Date (actual or estimated)	e. Estimated Cost (in thousands)	
				Entire Project	Work for which Firm was/is responsible
(1) General Accounting Office Washington, DC	Conduct an asbestos survey prepare contract drawings, cost estimates and project specifications.	General Services Administration 7th & D Streets, NW Washington, DC	1987	17,200.0	259.0
(2) Western Electric Company Baltimore, Maryland	Industrial Hygiene Consultants includes work with asbestos, cyanide, arsenic, coal tar pitch, etc.	AT&T Technologies 2500 Broening Highway Baltimore, Maryland	1984-1985	1,000.0	110.0
(3) General Motors Baltimore, Maryland	Asbestos survey of 3 million sq.ft. facility. Production of detailed drawings showing locations of asbestos material.	General Motors Corporations Broening Highway Baltimore, Maryland	1984	25.0 (fee)	25.0 (fee)
(4) U.S. Army Corp of Engineers Dredge Jadwin Vicksburg, Louisiana Mobile, Alabama	U.S. Army Corp of Engineers Dredge Jadwin Vicksburg, Louisiana Mobile, Alabama	U.S. Army Corps of Engineers Marine Design Division Philadelphia, PA	1985	5,000.0	51.0
(5) Noxell Corporation 10400 York Road Cockeysville, Maryland	Asbestos program management includes sampling, analysis, assessments, training, and abatement supervision	Noxell Corporation P.O. Box 1799 Baltimore, Maryland	1985-1986	400.0	47.0
(6) Maryland Cup Corporation Owings Mills, Maryland Sweetheart Products Dallas, Texas	Asbestos program includes design of all asbestos abatement work within the facility.	Sweetheart Products Group 10100 Reisterstown Road Owings Mills, Maryland	1985	300.0	38.0
(7) Sinai Hospital Baltimore, Maryland	Asbestos program management, includes monitoring abatement operations, surveys, analysis and employee training.	Sinai Hospital 2401 W. Belvedere Avenue Baltimore, Maryland	1986	45.0 (fee)	45.0 (fee)
(8) Greater Baltimore Medical Center Towson, Maryland	Asbestos program coordinator awareness training for hospital staff and administrators. Direct all abatement activities.	Greater Baltimore Medical Center 6701 N. Charles Street Towson, Maryland	1985	14.0 (fee)	14.0 (fee)
(9) Australian Embassy Washington, DC	Design of asbestos removal project-includes drawings contract documents and specifications.	Australian Embassy 1601 Massachusetts Avenue, NW Washington, DC	1985	750.0	21.0
(10) Carroll and Ligon Buildings 3450 Courthouse Drive Ellicott City, Maryland	Asbestos Survey, abatement design, exposure assessments, cost estimates and employee training.	Howard County Government 3450 Courthouse Drive Ellicott City, Maryland	1985	248.0	40.0

9. All work by firms or joint-venture members currently being performed directly for Federal agencies.

a. Project Name & Location	b. Nature of Firm's Responsibility	c. Agency (Responsible Office) Name & Address	d. Percent complete	e. Estimated Cost (In Thousands)	
				Entire Project	Work for which firm is responsible
(1) General Accounting Office 441 G Street, NW Washington, DC	Electron microscopy and industrial hygiene services.	General Accounting Office 441 G Street, NW Washington, DC	10%	10	100%
(2) Asbestos Management and Survey Whittier POL Terminal Seward Rec. Area Alaska	Asbestos Program Management: asbestos surveys, abatement project management, laboratory services.	U.S. Army Engineer District P.O. Box 898 Anchorage, Alaska	80%	400	100%
(3) Asbestos Program Management Architect of the Capitol Rm. HB28 U.S. Capitol Building Washington, DC	Asbestos Program Management: asbestos survey, training, abatement project management, laboratory services.	Architect of the Captiol Rm. HB28 U.S. Capitol Building Washington, DC	95%	70	100%
(4) Asbestos Consultant Services National Wildlife Refuge Cape Charles, VA	Asbestos abatement project management, environmental monitoring and electron microscopy services.	U.S. Department of Interior 1 Gateway Center Suite 700 Newton Corner, Mass.	95%	12	100%

10. Use this space to provide any additional information or description of resources (including any computer design capabilities) supporting your firm's qualifications for the proposed project.

Aerosol Monitoring & Analysis, Inc. (AMA, Inc.) understands the technical services involved in performing asbestos abatement project design, environmental monitoring, laboratory analysis and management of abatement programs. AMA, Inc. has the technically trained and experienced personnel currently on staff to satisfy all of the requirements specified to perform comprehensive asbestos consultant services.

AMA, Inc. is an analytical laboratory and consulting firm employing a staff of 38 professionals and support personnel. Our diverse and qualified staff possess the following degrees and certifications:

* 2 Certified Industrial Hygienists
* 3 Professionals with M.S. degrees
* 16 Professionals with B.S. degrees
* 17 NIOSH Trained Asbestos Analysts
* 1 Electron Microscopist with B.S. degree
* 1 Staff Architect with B.A. degree

In addition to the personal qualifications of our employees AMA, Inc. is accredited by the American Industrial Hygiene Association (#250), Johns Hopkins Associate and a member of both the American Council of Independent Laboratories and the Electron Microscopy Society of America. AMA, Inc. was the first firm to be approved by the Department of Health and Mental Hygiene to conduct asbestos training in the State of Maryland and has since trained over 8,000 individuals. Our laboratory has been a successful participant in both the EPA Quality Control Program and the NIOSH Proficiency Analytical Testing Program for 3 and 4 years respectively. Aerosol Monitoring & Analysis, Inc. also possesses the in-house capability to analyze asbestos samples using scanning/transmission electron microscopy with our JEOL 100CX TEMSCAN microscope. Having this ability makes our firm only one of ten such facilities in the country.

Aerosol Monitoring & Analysis, Inc., has provided asbestos-related technical and design services for government agencies, utility companies, hospitals, school boards, universities and private industry on asbestos projects both in the United States and abroad. These services have been responsible for fulfilling the following accomplishments:

* Environmental monitoring and management for over 2,000 asbestos abatement projects
* 80 million square feet of building space surveyed in over 1,000 facilities
* Cost estimates for over 60 million dollars worth of asbestos abatement work
* Laboratory analysis of over 50,000 asbestos air and bulk samples

In addition to the analysis and monitoring for asbestos, AMA, Inc. expanded its role into the area of training. In conjunction with our Industrial Hygienists, medical professionals and production specialists we developed an Asbestos Protection Course.

The course was the first of its kind to be approved by the State of Maryland, Department of Health and Mental Hygiene, on January 17, 1983. This course meets and exceeds all State requirements of asbestos training. Individuals who successfully complete the course will have satisfied the training requirements of the Code of Maryland Regulation 10.18.23 - "License to Remove or Encapsulate Asbestos". The Asbestos Protection Course has been taught to health and safety professionals, government and military agencies, utility companies, large manufacturers, major industrial corporations and a wide variety of contractors. To date over 8,000 participants have successfully completed the course.

Additional courses in asbestos sampling procedures, respirator usage, hearing protection, confined space entry, Right-to-Know requirements, and lead protection have been developed by our staff of Industrial Hygienists.

In light of this vast amount of experience our firm is more than capable of providing quality asbestos related services in a timely fashion.

11. The foregoing is a statement of facts.

Signature: _____ Typed Name and Title: _____

Date:

10. Use this space to provide any additional information or description of resources (including any computer design capabilities) supporting your firm's qualifications for the proposed project.

LETTERS OF RECOMMENDATION

US Department of Transportation
United States Coast Guard

Commanding Officer
U.S. Coast Guard Yard

Curtis Bay
Baltimore, MD 21226
Phone: 789-1600
Ext: 320

In-110
5100
09 June 1986

Aerosol Monitoring & Analysis
P.O. Box 697
Hunt Valley, Maryland

Dear Mr. Boggs,

I would like to commend your laboratory on its quality work and excellent service.

As you probably realize the Coast Guard has many different types of asbestos material. We encounter the majority of asbestos onboard our ships waiting to be serviced. Often times we are in a rush to get production rolling and get the ship out of the docks on schedule. The personnel at Aerosol Monitoring have been very responsive to our needs at the Coast Guard YARD.

I sincerely appreciate the timeliness in getting results back to me. I also appreciate the courtesy that your staff extends to me when a problem arises. It is a pleasure doing business with a quality minded laboratory such as Aerosol Monitoring.

Sincerely,

Christine Walls

CHRISTINE WALLS
Industrial Hygienist
U.S. Coast Guard YARD

Sinai Hospital of Baltimore

Department of Engineering
Baltimore, Maryland 21215

Engineering & Maintenance Department

August 9, 1984

Mr. Michael Cirri
Aerosol Monitoring and Analysis
PO Box 687
Hunt Valley, Maryland 21030

Dear Mike:

The outstanding performance of everyone in your organization has been of immense value and assistance to us at Sinai Hospital. The problems encountered during an asbestos abatement project are not simple ones, and your organization has done much to lighten the burden of our responsibility.

Please extend to everyone on your staff my sincere appreciation for the concern and commitment which they have extended to this institution on numerous occasions in the past.

Very truly yours,

Kenneth Bevan

Kenneth Bevan, General Foreman
Mechanical Services

KB/as

cc: Donald Allik

11. The foregoing is a statement of facts.

Signature: _____ Typed Name and Title: _____

Date:

ACORD CERTIFICATE OF INSURANCE

ISSUE DATE (MM/DD/YY): 2-6-87

PRODUCER

James Group Service, Inc.
230 West Monroe Street
Chicago, IL 60606

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.

COMPANIES AFFORDING COVERAGE

COMPANY LETTER A	Certain Insurance Companies per RF-10
COMPANY LETTER B	
COMPANY LETTER C	
COMPANY LETTER D	
COMPANY LETTER E	

INSURED

Aerosol Monitoring & Analysis, Inc.
246 Cockeysville Road
Hunt Valley, MD 21030

COVERAGES

THIS IS TO CERTIFY THAT POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS, AND CONDITIONS OF SUCH POLICIES.

TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	LIABILITY LIMITS	EACH OCCURRENCE	AGGREGATE
GENERAL LIABILITY COMPREHENSIVE FORM PREMISES/OPERATIONS UNDERGROUND EXPLOSION & COLLAPSE HAZARD PRODUCTS/COMPLETED OPERATIONS CONTRACTUAL INDEPENDENT CONTRACTORS BROAD FORM PROPERTY DAMAGE PERSONAL INJURY				BODILY INJURY	$	$
				PROPERTY DAMAGE	$	$
				BI & PD COMBINED	$	$
				PERSONAL INJURY		$
AUTOMOBILE LIABILITY ANY AUTO ALL OWNED AUTOS (PRIV. PASS.) ALL OWNED AUTOS (OTHER THAN PRIV. PASS.) HIRED AUTOS NON-OWNED AUTOS GARAGE LIABILITY				BODILY INJURY (PER PERSON)	$	
				BODILY INJURY (PER ACCIDENT)	$	
				PROPERTY DAMAGE	$	
				BI & PD COMBINED	$	
EXCESS LIABILITY UMBRELLA FORM OTHER THAN UMBRELLA FORM				BI & PD COMBINED	$	$
WORKERS' COMPENSATION AND EMPLOYERS' LIABILITY				STATUTORY		
				$ (EACH ACCIDENT)		
				$ (DISEASE-POLICY LIMIT)		
				$ (DISEASE-EACH EMPLOYEE)		
OTHER Professional Liability	LAB3A007-053	12-1-86	12-1-87	$1,000,000 ea. claim $1,000,000 aggregate		

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/SPECIAL ITEMS

CERTIFICATE HOLDER

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING COMPANY WILL ENDEAVOR TO MAIL 15 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO MAIL SUCH NOTICE SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE COMPANY, ITS AGENTS OR REPRESENTATIVES.

AUTHORIZED REPRESENTATIVE

Appendix H

DRUG MASTER FILE

TYPE III

PACKAGING MATERIALS

J.L. CLARK - TUBE DIVISION

a member of the

CLARCOR Consumer Products Group

2323 Sixth Street

P.O. Box 7007

Rockford, Il. 61125

ORIGINAL SUBMISSION

FOR

J.L.CLARK, TUBE DIVISION

2300 WISCONSIN AVE.

DOWNERS GROVE, ILL. 60515

a member of the

CLARCOR Consumer Products Group

2323 6th ST.

P.O. Box 7007

ROCKFORD, ILL. 61125

The statements made in this submission are accurate and correct in describing all practices and procedures included herein at the time of submission. All practices and procedures will be maintained throughout the period in which this document is registered with the Food and Drug Administration. The Drug Master File holder will comply with all statements in regards to that published within this document.

John Benton

John Benton, General Manager
Tube Division

ENVIRONMENTAL STATEMENT

J.L. CLARK ENVIRONMENTAL POLICY:

J.L. CLARK is committed to preservation and improvement of the environment for the world in which we operate. J.L. CLARK shall develop and maintain environmental plans appropriate for our facilities in accordance with federal, state and local regulations. It is the direct responsibility of designated management and supervisory personnel to report any violations of policy and any and all spills, leaks emissions or other releases of hazardous substances in a timely manner. J.L. CLARK will also strive to develop innovative packaging concepts to promote pollution prevention and environmentally friendly packages.

J.L. CLARK, TUBE DIVISION

TYPE III PACKAGING MATERIAL

COLLAPSIBLE ALUMINUM TUBES

The J.L. Clark, Tube Division manufactures and markets collapsible decorated, aluminum tubes in various sizes and shapes for a variety of customers who produce various products and use our tubes as the container for their items. The collapsible aluminum tubes and purchased materials including additives used in the tube production process for food and drug and cosmetic applications are F.D.A. approved or sanctioned material.

It is recognized that these aluminum tubes can become food, drug or cosmetic packaging components in certain applications. The manufacturing specifications, raw material controls, records and procedures for producing these packaging materials can be, if necessary, patterned after current Good Manufacturing Practice (GMP) for finished Pharmaceuticals as outlined in the Code of Federal Regulations, Title 21, Chapter I, Subchapter C, Part 211.

The following pages incorporate details relating to the materials, specifications, manufacturing practices, and controls pertinent to the collapsible aluminum tubes manufactured by J.L. Clark, Tube Div.

TABLE OF CONTENTS

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TUBE EXTERIOR COATING REQUIREMENTS	4
POLYETHYLENE REQUIREMENTS	5
POLYPROPLYENE REQUIREMENTS	6
PACKAGING REQUIREMENTS	7
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COATING CONTROLS	10
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DECORATED COLLAPSIBLE ALUMINUM TUBE, ASSEMBLED

A decorated, collapsible, aluminum tube is a structure intended to package and dispense drug products or other items of a liquid or semi-liquid nature. The tube is manufactured from an aluminum alloy which complies with FDA requirements and is purchased in the form of a "slug" which is ordered, by specification, in a variety of sizes and shapes from various authorized suppliers.

The "slug" is lubricated with zinc behenate and impact extruded in the form of a tube, which contains an open fill end and a threaded neck end with an orifice used for dispensing. The tube body is made circular in shape, in a variety of diameters and lengths. The tube, after extrusion, is trimmed to size, threaded, then goes through an "annealing" process where the aluminum is softened and the slug lubricant is burned off. After annealing, an internal lining may be applied to the inside if specified by the customer. The tube is coated on a portion of the exterior area, cured, and copy is applied onto the coating, again to customer specifications. A closure is then applied to the threaded end of the tube and a cold seal material applied to the inside of the fill end, if required by the customer. Tubes are then packaged in labeled containers, to customer requirements and to prevent damage in handling and transit. All these operations are done in one continuous process.

Wax coatings on the tube interior, using FDA approved materials is a secondary operation if required by the customer.

ALUMINUM SPECIFICATIONS

DESCRIPTION

Aluminum slugs are aluminum blanks used for impact extrusion. The blanks are punched from continuously cast stock that has been rolled to blanking thickness.

CHEMICAL COMPOSITION

All alloys used are controlled within the chemical composition limits as published by the Aluminum Association, 750 Third Avenue, New York, N.Y. 10017

ALLOYS USED

At this time and in the future the alloys used are AA 1170 and AA1070

MILL FINISH

Purchased Aluminum blanks are annealed, with a tumbled, vibrated, or shot blasted finish, not lubricated

HARDNESS

The maximum acceptable hardness for Aluminum blanks in alloys 1170 and 1070 are:

RcL 54 maximum (18 Brinnel)

PURCHASED SHAPE

All purchased Aluminum blanks are received in cupped or flat, solid or pierced form.

CRITICAL REQUIREMENTS

1. Gram weight of each lot of slugs must be within +/- 3% of specification.

2. Supplier must keep production records and maintain chemical analysis of each batch run for 2 years minimum

3. Supplier must submit batch run records to J.L. Clark, Tube Div. upon request.

4. Foreign objects, mixed slugs, or other materials are not allowed in the shipments received.

5. All containers used for shipping must be properly and legibly labeled with:
   - J.L.Clark, Tube Div. part number
   - Purchase order number
   - Weight of contents
   - Batch number of lot received
   - Part dimensions specified in P.O.

6. Any damage to slug, burrs, nicks and/or slivers, cannot exceed .010 in height, depth or width.

INTERNAL LINING REQUIREMENTS

Internal linings are protective interior coatings for aluminum collapsible tubes and are approved for use by the F.D.A.

J.L. Clark, Tube Div. uses INTERNAL LININGS only when required by the customers specifications. Such linings used are:

-Modified Epoxy
-Epoxy Phenolic
-Epoxy Amine
-Tube Wax
-Phenolic
-Polyamide-imide
-Vinyl

In addition to the above, F.D.A. approved can sealants are applied to portions of the tube interior when specified by the customer.

The film forming ingredients of the internal linings are referenced in 21 CFR 175.300. Wax undercoatings are referenced in either or both 21CFR 178.3710 and 21CFR 172.886 **Resinous and Polymeric Coatings.**

The internal linings are applied to tubes according to the recommendations of the manufacturer with controls in place to assure application compliance.
The manufacturer will maintain records on each batch/lot of material produced for 2 years minimum and label each product container with the correct batch/lot number.

TUBE EXTERIOR COATINGS

Tube exterior coatings are applied to the exterior of collapsible aluminum tubes. These tube coatings provide protection to the exposed aluminum and provide a basis for added decoration. The tube coatings, generically referred to as "collapsible tube Enamel", are generally roller coated onto the tubes. Tube coatings are purchased from various suppliers.

Requirements for Tube coatings are as follows:

1. Color of coating to be in accordance with developed color standards
2. Viscosity to be within manufacturer's specifications
3. Coatings to be free of contamination and foreign materials
4. Coatings must bake and bond at specified temperatures
5. Coatings must contain low heavy metal content and minimum solvent content required for application
6. Coatings must pass all required company test procedures
7. Coatings must be compatible with process inks
8. All shipping containers must be properly labeled; and include Company Name, P.O. number, lot or batch number, date of mfg., and quantity in container.
9. Containers must be suitable for agitation devices, either built in or added on.
10. Containers must safely contain contents and comply with Department of Transportation Standards

All containers of coatings received by J.L. Clark, Tube Div. are stored in a explosion proof room with appropriate safety devices and equipment. Procedures for storage, maintenance and material handling are known to all involved employees.

POLYETHYLENE REQUIREMENTS

The Polyethylene materials used by J.L. CLARK, Tube Division are purchased in the form of molded tube closures from selected suppliers. This polyethylene plastic shall conform to ASTM designation; D-1248 (latest revision) Standard Specification for Polyethylene Plastics Molding and Extrusion Materials. The material formulation must meet all requirements of the Code of Federal Regulations, Title 21, CFR 177.1520.

Suppliers of Polyethylene molded closures for food and drug applications shall provide J.L. Clark, Tube Div. with the Batch run number on each shipment made. These suppliers shall have a D.M.F. which is current and correct for the parts and materials purchased. These supplier shall comply with the contents of their Drug Master File. Changes to items purchased by J.L. Clark, Tube Div. which are listed on the D.M.F., require a 6 month advance notice.

The supplier must keep records for at least two years, past date of production, of all Resins and Colorants used in closures sold to J.L. Clark Tube Div. by batch/lot No. and date produced. These, and production records must be available for review upon request.

Production shipments must meet all Quality and performance requirements established between J.L. Clark, Tube Div. and the supplier. Product packaging must assure cleanliness of parts upon arrival and meet requirements established by N.S.T.A. for product protection in transit.

POLYPROPYLENE REQUIREMENTS

The Polypropylene materials used by J.L. CLARK, Tube Division are purchased in the form of molded tube closures from selected suppliers. This polypropylene plastic shall conform to ASTM designation; D-4101 (latest revision) Standard Specification for Polypropylene Plastics Molding and Extrusion Materials.

Suppliers of Polypropylene molded closures for food and drug applications shall provide J.L. Clark, Tube Div. with the Batch run number on each shipment made. These suppliers shall have a D.M.F. which is current and correct for the parts and materials purchased. These supplier shall comply with the contents of their Drug Master File. Changes to items purchased by J.L. Clark, Tube Div. which are listed on the D.M.F., must require a 6 month advance notice.

The supplier must keep records for at least two years past date of production, of all Resins and Colorants used in closures sold to J.L.Clark Tube Div. by batch/lot No. and date produced. These records must be available for review upon request.

Production shipments must meet all Quality and performance requirements established between J.L. Clark, Tube Div. and the supplier.

Product packaging must assure cleanliness of parts upon arrival and meet requirements established by N.S.T.A. for product protection in transit.

PACKAGING REQUIREMENTS

The packaging methods utilized for transporting the aluminum tubes are adapted from methods set forth by the Tube Council of North America.

Tubes are packaged in the following manner:

Partition packed: The tubes are packed into chipboard set-up boxes and are separated by chipboard cell-dividers. The set-up boxes are topped off with a chipboard cover, and are loaded into a corrugated carton. The cartons are sealed and labeled.

Bulk packed: The tubes are packed into corrugated trays without cell dividers. The tubes are nested in the trays to provide stability. The trays are topped off with a chipboard cover and stacked on a 40" x 48" hardwood pallet. The pallets are labeled and stretchwrapped.

The requirements for the packing materials utilized are:

Chipboard set-up boxes: Boxes are made from .030 DKL chipboard. the boxes are cut and scored from full sheets of chipboard and are assembled using 1" wide non-asphaltic stay tape. The chipboard covers are made from the same material and are assembled in the same fashion.

Corrugated cases: The corrugated cases are made from 125-200lb corrugation, with either a B-flute, C-flute or E-flute construction. The cartons are printed and labelled.

Corrugated trays: The corrugated trays are made to NSTA standards from 125-200lb corrugation with either B, C, or E-flute construction. The trays are not printed or labeled.

Pallets: The pallets used to stack the boxes of tubes are constructed of hardwoods. The decking is designed to handle the weight of the boxes and their contents.

Stretchfilm: The films used to wrap the pallets are either a blown or cast polyethylene film.

ALUMINUM CONTROL

Aluminum slugs are purchased from select producers for use in creating impact extruded, collapsible aluminum tubes. All aluminum slugs used in making collapsible tubes must meet the applicable requirements as established by Aluminum Association of America (AA), and by ASTM B-209 for the alloy required,

The slug dimensions and tolerances are established according to DIN 59604 page 2, and standards of the Association of Swiss Tube Manufacturers (VST). Major dimensional areas of control on the purchased slugs are: Outside diameter, Center hole size, gram weight, runout and thickness.

Suppliers must submit an annual certification on the alloy that J.L.Clark purchases. For each batch/heat from which J.L.Clark, Tube Div. receives material, the supplier is required to maintain a ladle analysis for a minimum of 2 years after production. This information must be made available for review, upon request.

After extrusion, the aluminum tube must meet the requirements and tolerances for form and function as specified by the Metal Tube Council of North America.

Each container of material received by J.L. Clark, Tube Div. must contain the Producers name, Order no., Part No., Customer name, and the lot/batch no. the material was produced from.

INTERNAL LINING CONTROL

Internal Linings are purchased from various sources for use as a protective barrier between the raw aluminum and the product the tube is intended to contain. Internal linings are made from various ingredients and to various formulas which include, but are not limited to; Epoxies, Phenolics, Waxes, and Vinyls. All Internal linings used in tubes for food, drug or cosmetic applications produced by J.L.Clark, Tube Div. are approved or in the process of obtaining approval by the F.D.A. Internal Lining suppliers must have a Drug Master File which is accessible to J.L.Clark Tube Div. customers upon request. A request for access to a Suppliers D.M.F. will be made in writing to the Supplier, specifying the Customer requesting access and the specific item or items the customer wants information on. The supplier must respond giving the D.M.F. number and approval for access.

Suppliers of Internal Linings must keep and maintain a record of each batch of lining material made for J.L.Clark, Tube Div. for 2 yrs. from manufacture date and submit the analysis upon request. Each container of lining material received must be labeled with the Company name, order no., part no. suppliers name and lot/batch number that it was made from.

J.L. Clark, Tube Div. maintains control over internal linings from receipt to application and all usage is documented.

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Internal Linings are purchased from various sources for use as a protective barrier between the raw aluminum and the product the tube is intended to contain. Internal linings are made from various ingredients and to various formulas which include, but are not limited to; Epoxies, Phenolics, Waxes, and Vinyls. All Internal linings used in tubes for food, drug or cosmetic applications produced by J.L.Clark, Tube Div. are approved or in the process of obtaining approval by the F.D.A. Internal Lining suppliers must have a Drug Master File which is accessible to J.L.Clark Tube Div. customers upon request. A request for access to a Suppliers D.M.F. will be made in writing to the Supplier, specifying the Customer requesting access and the specific item or items the customer wants information on. The supplier must respond giving the D.M.F. number and approval for access.

Suppliers of Internal Linings must keep and maintain a record of each batch of lining material made for J.L.Clark, Tube Div. for 2 yrs. from manufacture date and submit the analysis upon request. Each container of lining material received must be labeled with the Company name, order no., part no. suppliers name and lot/batch number that it was made from.

J.L. Clark, Tube Div. maintains control over internal linings from receipt to application and all usage is documented.

COATING CONTROLS

Upon receipt of a shipment of coating material, the receiving dept. verifies the contents to be correct against the purchase order and the packing slip. Receiving also checks containers for hidden damage and/or broken seals. When satisfied that the shipment is as specified and in good condition the receiving clerk stamps the containers with a Date Code which indicates when shipment was received.

Receiving Inspection is notified by receiving a copy of the Packing slip. Within two working days they are to inspect and approve the shipment. All incoming material shipments are checked to Mil.Std. 105D with specified sampling levels and A.Q.L's. When a shipment is approved by Q.C. the containers or lot is appropriately marked to indicate that acceptance. The receiving Dept. then can send the coating material to stock. The storage area for flammable coatings is in a separate room with all safety measures in place. A procedure controls and documents how the room is maintained and used. Audits are done periodically to determine conformance to the procedure. Coatings selected for use in production are taken to a specified location, by container, and checked for viscosity, color, temperature, and other factors prior to being agitated. Production Supervisors and set-up personnel are responsible for control of coatings and container safety in the manufacturing area.

Empty containers are disposed of according to U.S. Environmental Protection Agency (U.S.E.P.A.) requirements.

CLOSURE CONTROLS

Materials used by suppliers in the making of closures for food and drug applications for J.L. Clark, Tube Div. must meet F.D.A. requirements for food contact. These suppliers of closures must have a current Drug Master File, and be willing to submit same to review by a J.L. Clark designated customer.

Upon receipt of an order at J.L. Clark, Tube Div. the receiving clerk checks the shipment against the purchase order and the packing slip to determine conformance to requirements, and also checks for any hidden damage. Receiving inspection will be notified of shipment by receiving a copy of the packing slip. They will inspect and accept the shipment for quality. Inspection samples the lot to mil.std. 105D at specified A.Q.L.'s. When accepted, inspection marks containers as approved and notifies the receiving clerk who moves the material to the correct storage location. In some cases the material is purchased by the customer for use on their product only. These material lots are marked appropriately. Each container of material must be identification with the lot or batch number, date it was produced, suppliers name, part number and the purchase order number.

All closures are stored in a separate area and issued to production as required, to assure parts do not get mixed. Each run has the batch number documented on the run history, when applied to drug or food customers.

MANUFACTURING CONTROLS

The tube manufacturing process starts with a customer order quote. This quote when accepted leads to an order and begins with reviews of needed artwork and materials for the production of the order. When a order for a new structure or from a new source is received internal specifications are created or revised to reflect the actual part specifications and controls necessary to manufacture the product to the Customers and J.L. Clark's requirements. These documents are maintained in an Engineering document file and issue is controlled by established procedure. All supplier **Technical Data Sheets & Material Safety Data Sheets** are on file as required by law or for our internal controls.

Preparations are started to obtain materials for the scheduled production date. As necessary materials for the order are received they are inspected and sent to stock. If a shipment of material is found to be non-conforming, the supplier is notified via a NMR (Non-conforming Material Report) which is accompanied by a SCAR (Supplier Corrective Action Request). The supplier, upon receipt of the NMR/SCAR, must resolve discrepancy and initiate acceptable corrective action.

Prior to the product being set-up to run in production, the Production Supervisor makes the Bill of Materials, production order, Data card, blue prints, and color standards available for use by set-up, operators and inspectors. Inspectors, as part of job approval for production, are required to check the line to

determine it is clear of all tubes from previous production. The inspector then completes the inspection form for that operation and enters the conformance values. Throughout the production process random inspections are conducted to determine continued conformance. All inspections are recorded on the inspection sheets. Records are kept for two years.

If defective product is encountered, the inspector initiates a Hold For Inspection (H.F.I.) form to isolate product until it is disposed of by approval, scrap or rework. When disposition is completed material is moved from the "Hold" area to the appropriate location. Disposition of product or material will be recorded on the H.F.I. form with the quantity and time involved in determining disposition. The form will be turned in to the Process Control Manager for recording.

When the production order is completed, the Production Supervisor signs the last inspection sheet on the job signifying that the line has been cleared of any product from the completed job.

Product is packaged and labeled on the line as it is produced. At the end of each shift all product in complete package units is counted and sent to finished goods stock. Finished goods verifies quantity and stores the material for shipment. The last package of product, if not full, has a label affixed which states that the container is a "partial box" and gives the quantity enclosed. At finished goods the completed products are final packed, according to specification, to prevent transit damage. The finished order is

DRUG MASTER FILE

TYPE III

PACKAGING MATERIALS

DMF NUMBER 9860

J.L. CLARK - TUBE DIVISION

a member of the

CLARCOR Consumer Products Group

2323 Sixth Street

P.O. Box 7007

Rockford, Il. 61125

then labeled and stored until shipment.

J.L. CLARK, Tube Div. procedures mentioned are controlled by their Quality Procedure Manual.

REVISED SUBMISSION: SEPTEMBER, 1994

FOR

J.L.CLARK, TUBE DIVISION

2300 WISCONSIN AVE.

DOWNERS GROVE, ILL. 60515

a member of the

CLARCOR Consumer Products Group

2323 6th ST.

P.O. Box 7007

ROCKFORD, ILL. 61125

The statements made in this submission are accurate and correct in describing the practices and procedures included herein at the time of submission. These practices and procedures will be maintained throughout the period in which this document is registered with the Food and Drug Administration. The Drug Master File holder will comply with all statements in regards to that published within this document.

John Benton, General Manager
Tube Division

ENVIRONMENTAL STATEMENT

J.L. CLARK ENVIRONMENTAL POLICY:

J.L. CLARK is committed to the preservation and improvement of the environment for the world in which we operate. J.L. CLARK shall develop and maintain environmental plans appropriate for our facilities in accordance with federal, state and local regulations. It is the direct responsibility of designated management and supervisory personnel to report any violations of policy and any and all spills, leaks, emissions or other releases of hazardous substances in a timely manner. J.L. CLARK will also strive to develop innovative packaging concepts to promote pollution prevention and environmentally friendly packages.

J.L. CLARK, TUBE DIVISION

TYPE III PACKAGING MATERIAL

COLLAPSIBLE ALUMINUM TUBES

The J.L. Clark, Tube Division manufactures and markets collapsible decorated, aluminum tubes in various sizes and shapes for a variety of customers who produce various products and use our tubes as the container for their items. The collapsible aluminum tubes and purchased materials including additives used in the tube production process for food, drug and cosmetic applications are F.D.A. approved or sanctioned materials.

As it is recognized that these aluminum tubes can become food, drug or cosmetic packaging components in certain applications. The manufacturing specifications, raw material controls, records and procedures for producing these packaging materials can be, if necessary, patterned after current Good Manufacturing Practice (GMP) for finished Pharmaceuticals as outlined in the Code of Federal Regulations, Title 21, Chapter I, Subchapter C, Part 211.

The following pages incorporate details relating to the materials, specifications, manufacturing practices, and controls pertinent to the collapsible aluminum tubes manufactured by J.L. Clark, Tube Div.

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DECORATED COLLAPSIBLE ALUMINUM TUBE, ASSEMBLED

A decorated, collapsible, aluminum tube is a structure intended to package and dispense drug products or other items of a liquid or semi-liquid nature. The tube is manufactured from an aluminum alloy which complies with FDA requirements and is purchased in the form of a "slug" which is ordered, by specification, in a variety of sizes and shapes from various authorized suppliers.

The "slug" is lubricated and impact extruded into the form of a tube, which contains an open fill end and a threaded neck end with an orifice used for dispensing. The tube body is made circular in shape, in a variety of diameters and lengths. The tube, after extrusion, is trimmed to size, threaded, then goes through an "annealing" process where the aluminum is softened and the slug lubricant is burned off. After annealing, an internal lining may be applied to the inside if specified by the customer. The tube is coated on a portion of the exterior area, cured, and copy is applied onto the coating, again to customer specifications. A closure is then applied to the threaded end of the tube and a cold seal material applied to the inside of the fill end, if required by the customer. Tubes are then packaged in labeled containers, to customer requirements and to prevent damage in handling and transit. All these operations are done in one continuous process.

Wax coatings on the tube interior, using FDA approved materials is a secondary operation if required by the customer.

ALUMINUM SPECIFICATIONS

DESCRIPTION

Aluminum slugs are aluminum blanks used for impact extrusion. The blanks are punched from continuously cast stock that has been rolled to blanking thickness.

CHEMICAL COMPOSITION

All alloys used are controlled within the chemical composition limits as published by the Aluminum Association, 750 Third Avenue, New York, N.Y. 10017

ALLOYS USED

At this time and in the forseeablefuture the alloys by this division are AA 1170 and AA 1070 only.

MILL FINISH

Purchased Aluminum blanks are annealed, with tumbled or vibrated finish, not lubricated

HARDNESS

The maximum acceptable hardness for Aluminum blanks in alloys 1170 and 1070 are:

RcL 54 maximum (18 Brinnel)

PURCHASED SHAPE

All purchased Aluminum blanks are received in cupped solid or pierced form and as flat pierced slugs.

CRITICAL REQUIREMENTS

1. Average gram weight of each lot of slugs must be within +/- 3% of specification.

2. Supplier must keep production records and maintain chemical analysis of each batch run for 2 years minimum

3. Supplier must submit batch run records to J.L. Clark, Tube Div. upon request.

4. Foreign objects, mixed slugs, or other materials are not allowed in the shipments received.

5. Each container used for shipping must be properly and legibly labeled with:
   - -J.L.Clark, Tube Div. part number
   - -Purchase order number
   - -Weight of contents, or quantity.
   - -Batch lot number
   - -Part dimensions specified in P.O.
6. Any damage to slug; burrs, nicks and/or slivers, cannot exceed .010 in height, depth or width.

INTERNAL LINING REQUIREMENTS

Internal linings are protective interior coatings for aluminum collapsible tubes and selected coatings are approved for use by the F.D.A. J.L. Clark, Tube Div. uses INTERNAL LININGS only when required by the customers specifications. Such linings used are:

- -Modified Epoxy
- -Epoxy Phenolic
- -Epoxy Amine
- -Tube Wax
- -Phenolic
- -Polyamide-imide
- -Vinyl

In addition to the above, F.D.A. approved can sealants are applied to portions of the tube interior when specified by the customer.

The film forming ingredients of the internal linings are referenced in 21 CFR 175.300. Wax undercoatings are referenced in either or both 21CFR 178.3710 and 21CFR 172.886 **Resinous and Polymeric Coatings.**

The internal linings are applied to tubes according to the recommendations of the manufacturer with controls in place to assure application compliance.

The manufacturer will maintain records on each batch/lot of material produced for 2 years minimum and label each product container shipped with the assigned batch/lot number.

TUBE EXTERIOR COATINGS

Tube exterior coatings are applied to the exterior of collapsible aluminum tubes. These tube coatings provide protection to the exposed aluminum and provide a basis for added decoration. The tube coatings, generically referred to as "collapsible tube Enamel", are roller coated onto the tubes. Tube coatings are purchased from various suppliers.

Requirements for Tube coatings are as follows:

1. Color of coating to be in accordance with developed color standards
2. Viscosity to be within manufacturer's specifications
3. Coatings to be free of contamination and foreign materials
4. Coatings must bake and bond at specified temperatures
5. Coatings must contain low heavy metal content and minimum solvent content required for application
6. Coatings must pass all required company test procedures
7. Coatings must be compatible with process inks
8. All shipping containers must be properly labeled; and include Company Name, P.O. number, lot or batch number, date of mfg., and quantity in container.
9. Containers must be suitable for agitation devices, either built in or added on.
10. Containers must safely contain contents and comply with Department of Transportation Standards

All containers of coatings received by J.L. Clark, Tube Div. are stored in a explosion proof room with appropriate safety devices and equipment. Procedures for storage, maintenance and material handling are known to all involved employees.

POLYETHYLENE REQUIREMENTS

The Polyethylene materials used by J.L. CLARK, Tube Division are purchased in the form of molded tube closures from selected suppliers. This polyethylene plastic shall conform to ASTM designation; D-1248 (latest revision) Standard Specification for Polyethylene Plastics Molding and Extrusion Materials. The material formulation must meet all requirements of the Code of Federal Regulations, Title 21, CFR 177.1520.

Suppliers of Polyethylene molded closures for food and drug applications shall provide J.L. Clark, Tube Div. with the Batch run number on each shipment made. These suppliers shall use raw materials that are FDA approved and are correct for the parts and materials purchased. Supplier shall comply with the requirements for material documentation. Changes to items purchased by J.L. Clark, Tube Div. which are listed on their customers D.M.F., require a 6 month advance notice. The supplier must keep records for at least two years, past date of production, of all Resins and Colorants used in closures sold to J.L. Clark, Tube Div. by supplier name,batch/lot No. and order information. Production and quality records, must be available for review upon request.

Production shipments must meet all Quality, performance, and labelling requirements established between J.L. Clark, Tube Div. and the supplier. Product packaging must assure cleanliness of parts upon arrival and meet requirements established by N.S.T.A. for product protection in transit.

POLYPROPYLENE REQUIREMENTS

The Polypropylene materials used by J.L. CLARK, Tube Division are purchased in the form of molded tube closures from selected suppliers. This polypropylene plastic shall conform to ASTM designation; D-4101 (latest revision) Standard Specification for Polypropylene Plastics Molding and Extrusion Materials.

Suppliers of Polypropylene molded closures for food and drug applications shall provide J.L. Clark, Tube Div. with the Batch run number on each shipment made. These suppliers shall use FDA approved raw materials which is current and correct for the parts and materials purchased. These suppliers shall comply with the requirements for material doucmentation Changes to items purchased by J.L. Clark, Tube Div. which are listed on the D.M.F., must require a 6 month advance notice and customer approval.
The supplier must keep records for at least two years past date of production, of all Resins and Colorants used in closures sold to J.L.Clark Tube Div. by supplier name, batch/lot No. and order information. Production and quality records must be available for review upon request.

Production shipments must meet all Quality, performance, and labelling requirements established between J.L. Clark, Tube Div. and the supplier. Product packaging must assure cleanliness of parts upon arrival and meet requirements established by N.S.T.A. for product protection in transit.

PACKAGING REQUIREMENTS

The packaging methods utilized for transporting the aluminum tubes are adapted from methods set forth by the Tube Council of North America.

Tubes are packaged in the following manner:

Partition packed: The tubes are packed into chipboard set-up boxes and are separated by chipboard cell-dividers. The set-up boxes are topped off with a specified cover, and are loaded into a corrugated carton. The cartons are sealed and labeled.

Bulk packed: The tubes are packed into corrugated trays without cell dividers. The tubes are nested in the trays to provide stability. The trays are topped off with a specified cover and stacked on a hardwood pallet. The pallets are labeled and stretchwrapped.

The requirements for the packing materials utilized are:

Chipboard boxes: Boxes are made from .030 DKL chipboard. the boxes are cut and scored from full sheets of chipboard and are assembled using 1" wide non-asphaltic stay tape. the chipboard covers are made from the same material and are assembled in the same fashion.

Corrugated cases: The corrugated cases are made from 200lb corrugation, with either a B-flute, C-flute or E-flute construction. The cartons are printed and labelled.

Corrugated trays: The corrugated trays are made to NSTA standards from 200lb corrugation with either B, C, or E-flute construction.
The trays are not printed or labeled.

Pallets: The pallets used to stack the boxes of tubes are constructed of hardwoods. The decking is designed to handle the weight of the boxes and their contents.

Stretchfilm: The films used to wrap the pallets are either a blown or cast polyethylene film.

ALUMINUM CONTROL

Aluminum slugs are purchased from select producers for use in creating impact extruded, collapsible aluminum tubes. All aluminum slugs used in making collapsible tubes must meet the applicable requirements as established by Aluminum Association of America (AA), and by ASTM B-209 for the alloy required,

The slug dimensions and tolerances are established according to DIN 59604 page 2, and standards of the Association of Swiss Tube Manufacturers (VST). Major dimensional areas of control on the purchased slugs are: Outside diameter, Center hole size, gram weight, runout and thickness.

Suppliers may submit an annual certification on the alloy that J.L.Clark purchases. For each batch/heat from which J.L.Clark, Tube Div. receives material, the supplier is required to maintain a ladle analysis for a minimum of 2 years after production. This information must be made available for review, upon request.

After extrusion, the aluminum tube must meet the requirements and tolerances for form and function as specified by the Metal Tube Council of North America.

Each container of material received by J.L. Clark, Tube Div. must contain the Producer and customer name, Order no., Part No., lot/batch no., and quanitity or weight assigned to the material.

INTERNAL LINING CONTROL

Internal Linings are purchased from various sources for use as a protective barrier between the raw aluminum and the product the tube is intended to contain. Internal linings are made from various ingredients and to various formulas which include, but are not limited to; Epoxies, Phenolics, Waxes, and Vinyls. All Internal linings used in tubes for food, drug or cosmetic applications produced by J.L.Clark, Tube Div. are approved or in the process of obtaining approval by the F.D.A. Internal Lining suppliers must have a Drug Master File or run records, which are accessible to J.L.Clark Tube Div. customers upon request. A request for access to a Suppliers D.M.F. will be made in writing to the Supplier, specifying the Customer requesting access and the specific item or items the customer wants information on. The supplier must respond giving the D.M.F. number and approval for access.

Suppliers of Internal Linings must keep and maintain a record of each batch of lining material made for J.L.Clark, Tube Div. for 2 yrs. from manufacture date and submit the analysis upon request. Each container of lining material received must be labeled with the supplier and customer name, order no., part no., lot/batch number, and weight or quantity. Suppliers must provide a M.S.D.S. (Material Safety and Data Sheet) with the initial shipment or after a product change and provide proper labeling on all containers. J.L. Clark, Tube Div. maintains control over internal linings from receipt to application and all testing is documented.

COATING CONTROLS

Upon receipt of a shipment of coating material, the receiving dept. verifies the contents to be correct against the purchase order and the packing slip and checks containers for hidden damage and/or broken seals. When satisfied that the shipment is as specified and in good condition the receiving clerk stamps the containers with a Date Code which indicates when shipment was received.

Receiving Inspection is notified by receiving a copy of the Packing slip. Within two working days they are to inspect and approve the shipment. Incoming material shipments are checked to a modified Mil.Std. 105D with specified sampling levels and A.Q.L's. When a shipment is approved by Q.C. the containers or lot is appropriately marked to indicate that acceptance. The Receiving Dept. then can send the coating material to stock. The storage area for flammable coatings is in a separate room with approved safety measures in place. Established procedures control and document room maintenance and use. Audits are done semi-annually to determine conformance to the procedure. Coatings selected for use in production are checked for viscosity, color, temperature, and other factors prior to being agitated. Production Supervisors and set-up personnel are responsible for control of coatings and container safety in the manufacturing area. Empty containers are disposed of according to U.S. Environmental Protection Agency (U.S.E.P.A.) requirements.

CLOSURE CONTROLS

Materials used by suppliers in the making of closures for food and drug applications for J.L. Clark, Tube Div. must meet F.D.A. requirements for food contact. These suppliers of closures must maintain complete run records for 2 years and be willing to submit same to review by J.L. Clark or it's designated customer.

Upon receipt of an order at J.L. Clark, Tube Div. the receiving clerk checks the shipment against the purchase order and packing slip to determine conformance to requirements, and checks for any hidden damage. Inspection is notified of shipment by receiving a copy of the packing slip. Inspection samples the lot to mil.std. 105D at specified A.Q.L.'s. When accepted, inspection marks containers as approved. Receiving Clerk moves the material to the correct storage location. In some cases, customer purchased materials are stored at this division for use on their product only. These material lots are marked appropriately and visibly segregated. Each container of material must be identified with the lot or batch number, the date of production, suppliers name,part number, quantity or weight and the purchase order number.

All closures are stored in a separate area and issued to production as required, to assure parts do not get mixed. Each run has the batch number documented on the run history, when applied to drug or food customers.

MANUFACTURING CONTROLS

The tube manufacturing process starts with a customer order quote. This quote when accepted, leads to an order and begins with reviews of needed artwork and materials for the production of the order. When a order for a new structure or from a new source is received internal specifications are created or revised to reflect the actual part specifications and controls necessary to manufacture the product to the Customers and J.L. Clark's requirements. These documents are maintained in an Engineering document file and issue is controlled by established procedure.

Materials are ordered and scheduled for the production date. As necessary materials for the order are received they are inspected and sent to stock. If a shipment of material is found to be non-conforming, the supplier is notified via a NMR (Non-conforming Material Report) which is accompanied by a SCAR (Supplier Corrective Action Request). The supplier, upon receipt of the NMR/SCAR, must resolve discrepancy and initiate acceptable corrective action. Defective material is iosolated prior to disposition. Prior to the product being set-up to run in production, the Production Supervisor makes the Bill of Materials, production order, Data card, blue prints, and color standards available for use by set-up, operators and inspectors. Inspectors, as part of job approval for production, are required to check the line to determine it is clear of all tubes from previous production. The inspector then completes the inspection form for

that operation and enters the conformance values. Throughout the production process random inspections are conducted to determine continued conformance. All inspections are recorded on the inspection sheets. Records are kept for two years.

If defective product is encountered, the inspector initiates a Hold For Inspection (H.F.I.) form to isolate product until disposed of by approval, scrap or rework. When disposition is completed material is moved from the "Hold" area to the appropriate location. Disposition of product or material will be recorded on the H.F.I. form with the quantity and time involved in determining disposition. The data will be tracked and trends reviewed.

When a production order is completed, the Production Supervisor signs the last inspection sheet on the job signifying that the line has been cleared of any product from the completed job. Product is packaged and labeled on the line as it is produced. At the end of each shift all product in complete package units is counted and sent to finished goods stock. Finished goods verifies quantity and stores the material for shipment. The last package of product, if not full, has a label affixed which states that the container is a "partial box" and gives the quantity enclosed. At finished goods the completed products are final packed, according to specification, to prevent transit damage. The finished order is then labeled and stored until shipment.

J.L. CLARK, Tube Div. procedures mentioned are controlled by their Quality Procedure Manual.

Appendix I

OFFICIAL COPY
A00

PURCHASE AGREEMENT

ATLAS TUBE COMPANY (Atlas) and DA-KAY ENTERPRISES, INC. (Da-Kay), each an Illinois corporation (collectively called the "Sellers"), the individual parties whose names appear on the execution page (Individual Parties) and J. L. CLARK MANUFACTURING CO. (Buyer), an Illinois corporation, agree as follows:

1. Separate Covenants. Unless the context otherwise specifies, the covenants, representations and warranties of each of the Sellers are separate and relate only to the portion of the Conveyed Property owned by them respectively and to their respective businesses. All payments shall be made by certified check payable to both Sellers (who shall apportion such payment as their respective interests shall appear on the Closing Date) and Buyer shall not be responsible for any such apportionment of payments and may rely upon the joint receipt of the Sellers for such payment.

2. Agreement Date and Closing Date.

2.1 This Agreement is executed on January 6, 1967 (Agreement Date).

2.2 The purchase and sale contemplated by this Agreement will be effected on February 1, 1967 (Closing Date) at the offices of Rothschild, Hart, Stevens & Barry, 105 South La Salle Street, Chicago, Illinois.

3. Assets and Property to be Sold. On the basis of the representations and warranties and subject to the terms and conditions hereinafter set forth, on the Closing Date Sellers will sell, convey, assign and transfer and Buyer will purchase, at the purchase price determined pursuant to Section 10, all of the following assets and property:

3.1 Fixed Assets. All land and buildings now owned by Sellers (including approximately 5 acres of land and the buildings situated thereon located at 2300 Wisconsin Avenue, Downers Grove, Illinois, more particularly described in Chicago Title and Trust Company Owners Title Policy No. 306811 DuPage and Survey dated February 3, 1960 and the East 20 feet of Lot 11 as shown on the Survey dated October 23, 1963 heretofore

delivered to Buyer) and all of the machines, manufacturing equipment, office and other furniture, tools, jigs, dies, fixtures, conveyors, racks, materials handling equipment, office equipment, and all other fixed assets of Sellers (including but not limited to those listed in the inventory of fixed assets dated as of December 1, 1966 heretofore delivered to Buyer) owned by Sellers on the date hereof or hereafter purchased and owned by Sellers on the Closing Date whether or not located on premises now owned or occupied by Sellers. This property is hereinafter called the "Fixed Assets."

3.2 Inventory and Supplies. All inventories and supplies (including any in transit on the Closing Date) owned by Sellers at the Closing Date, including but not limited to all raw materials, work in process and finished products, as determined by a physical count to be taken on the Closing Date as provided by Section 10.2. This property is hereinafter called the "Inventory" or "Inventories."

3.3 The Name "Atlas Tube Company," Trade-marks, Trade Names and Copyrights.

All right, title and interest of Sellers in and to the name "Atlas Tube Company," either alone or in combination with any word or words, and all licenses and rights to use patents or inventions of others, designs, drawings, inventions, engineering data, manuals, library, trade-marks, trade names and copyrights, and correspondence, records and information regarding the foregoing, if any, owned by Sellers on the Closing Date.

3.4. Books and Records. All files of correspondence with suppliers, customers and others, manufacturing, technical and sales record information and other records of Sellers pertaining to the manufacture and sale of their products.

3.5 Capping Machines. Sellers' rights to acquire two Mall automatic tube capping machines, including the right to apply toward the payment of the purchase price thereof an advance payment of $3,462.57 heretofore made by Sellers.

3.6 Definition: Conveyed Property. The assets property and rights described in Sections 3.1, 3.2, 3.3, 3.4 and 3.5 are hereinafter collectively called the "Conveyed Property."

4. Representations and Warranties of Sellers and Individual Parties. Sellers and the Individual Parties represent and warrant to Buyer as follows:

4.1 Each of the Sellers is a corporation validly organized, existing and in good standing under the laws of Illinois.

4.2 The Combined Balance Sheet as of July 31, 1966, and the Combined Statement of Earnings and Retained Earnings for the Six Months ended July 31, 1966, were prepared in accordance with generally accepted accounting practices and present fairly the financial condition of Sellers as at July 31, 1966, and the results of operations for the six months period ended July 31, 1966.

4.3 Sellers on the Closing Date will own, absolutely, good title (in fee simple with respect to real estate) to all Conveyed Property, subject to no lien, mortgage, pledge, encumbrance, claim, or security interest, except, however, in the case of real estate, to the printed and other exceptions appearing in the Title Policy referred to in Section 3.1 (but not exception 7 for a Trust Deed dated April 13, 1961), and to the lien of 1966 and 1967 real estate taxes not yet due and payable.

4.4 There have not been since December 1, 1966, any sale or other disposition of any of the Fixed Assets listed on the inventory referred to in Section 3.1.

4.5 Sellers will not, without the consent of Buyer, between the Agreement Date and the Closing Date:

4.5.1 Purchase, sell or lease any assets of the type constituting the Fixed Assets

4.5.2 Increase any rate of compensation, employee benefit or sales commission

4.5.3 Mortgage, pledge, or subject to lien or other encumbrance any of the conveyed property other than liens created by law in the ordinary course of business, or

4.5.4 Enter into any transaction in connection with the business of manufacturing and selling Sellers' products other than in the ordinary course of business.

4.6 All of the Fixed Assets are, considering age and length of service, in good and serviceable condition, reasonable wear and tear excepted, and Sellers know of no material defect in the condition of any of the Fixed Assets; and all of the Inventories are sound, saleable and usable in the manufacture and sale of Sellers' products.

4.7 Sellers have or possess adequate patent rights or licenses or other rights to use patent rights, the inventions, trademarks, trade names and copyrights necessary to conduct the present business of manufacturing and selling Sellers' products and have not received any notice or claim of conflict with the asserted rights of others.

4.8 Since July 31, 1966, there has been no material adverse change in the assets, liabilities and financial condition of Sellers and the Conveyed Property has not been adversely affected as the result of fire or other casualty or by confiscation or seizure.

4.9 Sellers are not a party to any contract not made in the ordinary course of business which affects the Conveyed Property.

4.10 Sellers are not a party to any labor or employment contract (other than the labor contract between Atlas Tube Company and Local No. 16, of the Metal Processors' Union, AFL-CIO, a true copy of which has heretofore been delivered to Buyer) or any material distributor, dealer, manufacturer's representative (other than the agreement dated December 29, 1961, with Muriel Sapery, doing business as The Sapery Company, a true copy of which has heretofore been delivered to Buyer), sales agency or advertising contract nor are Sellers' party to any pension, retirement or Profit Sharing Trust or plan for the benefit of its employees which would become the legal obligation of Buyer upon consummation of the purchase contemplated by this Agreement.

4.11 There are no actions, suits or proceedings pending, or to the knowledge of any of its officers, threatened against or affecting to any material degree Sellers or their properties or business, at law or in equity, or before any Federal, State, Municipal or other governmental department, commission, board, agency or instrumentality, domestic or foreign except

for the actions set forth in footnote 5 to the Financial Statements referred to in Section 4.2.

4.12 No zoning ordinance or other administrative regulation prevents or interferes in any material respect with the present use of the Fixed Assets, and all improvements located on the real estate constituting a portion of the Fixed Assets are within all applicable building lines.

4.13 All negotiations relative to this Agreement and the transactions contemplated thereby have been carried out by Sellers with Buyer without intervention of any broker or other person except for the employment of James R. Ogborn & Company by Sellers as a broker on their behalf.

4.14 Sellers have full power upon appropriate vote of the holders of their outstanding common shares, in accordance with law and their respective Articles of Incorporation and By-Laws, to transfer their assets and property as contemplated by this Agreement, and appropriate action has been taken by their respective Boards of Directors and will be taken prior to the Closing Date by their respective shareholders to approve the execution of this Agreement and the transactions herein contemplated and such execution and transactions will not violate any contractual obligation of either of the Sellers.

4.15 Sellers do not have any subsidiaries.

4.16 All shipments, billings and purchases made by Sellers in the 60-day period prior to the Closing Date were made in the ordinary course of business and without any anticipation of sales ordinarily made in the period after November 30 in any fiscal year.

4.17 The representations of the Individual Parties are joint and several.

4.18 Each of the above representations and warranties shall be true at the Closing Date.

5. Representations and Warranties of Buyer. Buyer represents and warrants to Sellers as follows:

5.1 Buyer is a corporation validly organized, existing and in good standing under the laws of Illinois.

5.2 All negotiations relative to this Agreement and the transactions contemplated thereby have been carried out by Buyer with James R. Ogborn & Company or directly with Sellers without intervention of any other person.

5.3 Buyer has full power upon appropriate vote of its Board of Directors to purchase the Conveyed Property.

6. Access to Plant, Records, etc. and Furnishing Information.

6.1 Between the Agreement Date and the Closing Date, Sellers shall afford the officers and other employees and representatives of Buyer free and full access to the plants, property and books and records (including Federal income tax returns) of Sellers pertaining to the business of manufacturing and selling Sellers' products, and Sellers will furnish Buyer with such additional financial or operating data and other information as to the Conveyed Property as Buyer shall, from time to time reasonably request, and shall make available for inspection license agreements, purchase orders, orders from customers and other contracts, agreements and documents pertaining to the business of manufacturing and selling Sellers' products to which Sellers are a party.

6.2 Upon request, Sellers will permit Buyer to make copies or otherwise reproduce the general ledgers and journals of account and the Federal income tax returns of Sellers for the six fiscal years ended January 31, 1967.

7. Covenant of Individual Parties to Obtain Shareholder Approval. Between the Agreement Date and the Closing Date, the Individual Parties will use their best efforts to obtain all necessary corporate action by Sellers and favorable votes of Shareholders of Sellers necessary for the consummation of the transactions contemplated by this Agreement.

8. Conditions to Obligations of Buyer. The obligations of Buyer under this Agreement shall, at the option of Buyer, be subject to the following conditions:

8.1 None of the representations and warranties of Sellers contained in Section 4 shall be false at the Closing Date.

8.2 All the terms and conditions of this Agreement to be complied with and to be performed by Sellers at or before the Closing Date shall have been duly complied with and performed.

8.3 All actions, proceedings, instruments and documents required to carry out this Agreement, and all other related legal matters shall have been approved at or before the Closing Date by Messrs. Sidley, Austin, Burgess & Smith, counsel for Buyer.

8.4 Between July 31, 1966, and the Closing Date, there shall not have been any damage to or loss or destruction of any of the Conveyed Property or any strike, boycott, riot or other calamity affecting the business of the Sellers.

9. Conditions to Obligations of Sellers. The obligations of Sellers under this Agreement shall, at the option of Sellers, be subject to the following conditions:

9.1 None of the representations and warranties of Buyer contained in Section 5 shall be false at the Closing Date.

9.2 All the terms and conditions of this Agreement to be complied with and to be performed by Buyer at or before the Closing Date shall have been duly complied with and performed.

9.3 All actions, proceedings, instruments and documents required to carry out this Agreement, and all other related legal matters shall have been approved at or before the Closing Date by Rothschild, Hart, Stevens & Barry, counsel for Seller.

10. Purchase Price. The amount of the Purchase Price shall be determined as follows:

10.1 Amount. The amount of the Purchase Price shall be the sum of:

10.1.1 $1,100,000 in exchange for the Fixed

Assets to be allocated as follows: $50,000 for the real estate, $400,000 for the buildings located on the real estate and $650,000 for the personal property constituting the other Fixed Assets.

10.1.2 An amount equal to the net book value of the Inventory determined in accordance with Sections 10.2 and 10.3.

10.2 Physical Count of Inventories and Supplies. As of the Closing Date, Sellers will make a physical count of all Inventory.

10.3 Valuation of Inventory and Supplies. All Inventory counted pursuant to Section 10.2 shall be valued for the purposes of Section 10.1.2 at the lower of cost or market (market on an individual item basis) in accordance with generally accepted accounting practices. All Inventories in transit as of the Closing Date shall be included in the physical count taken as provided in Section 10.2 and valued as provided in this Section 10.3.

10.4 Observation and Verification. The physical count of Inventory made pursuant to Section 10.2 may be observed by employees of Buyer and by representatives of Lybrand, Ross Bros. & Montgomery, independent certified public accountants for Buyer, and by representatives of Alexander Grant & Co., independent certified public accountants for Sellers, and such employees and representatives shall be permitted to make such tests of the valuation of such count made pursuant to Section 10.3 as each of them may deem appropriate.

10.5 Report of Count and Valuation. Sellers shall furnish a report of the count and valuation provided by Sections 10.2 and 10.3 and such report shall be certified by Alexander Grant & Co., certified public accountants for Sellers, to have been made in compliance with this Agreement.

10.6 Procedures in Case of Disagreement. In case of disagreement as to physical count or inventory or the net book value thereof, the joint decision of Alexander Grant & Co. and Lybrand, Ross Bros. & Montgomery shall be conclusive. If such accountants cannot agree, such matter shall be submitted to

Arthur Andersen & Co., independent public accountants, and the decision of Arthur Andersen & Co. shall be conclusive with respect to any such matter submitted to them.

11. Closing. On the Closing Date and at the place of closing set forth in Section 2:

11.1 Seller shall deliver to Buyer the following:

11.1.1 Stamped warranty deeds, bills of sale and other instruments of conveyance, assignment and transfer of the Conveyed Property.

11.1.2 Report on title prepared by Chicago Title and Trust Company covering the real estate constituting part of the Fixed Assets showing Da-Kay to hold as of a date not more than 15 days prior to the Closing Date marketable title in fee simple to such real estate, subject only to standard printed exceptions, liens for 1966 and 1967 real estate taxes not yet due and payable, and minor encumbrances and easements which, in Buyer's opinion, are immaterial insofar as the value of the property is concerned and which do not interfere with the use or occupancy of the property.

11.1.3 Such certificate or certificates signed by the President of Sellers and the Individual Parties in form satisfactory to Buyer as Buyer shall reasonably require to evidence compliance by Sellers as of the Closing Date with the terms and conditions of this Agreement and the correctness, as of the Closing Date, of the representations and warranties made by Sellers and the Individual Parties in this Agreement.

11.1.4 An opinion of Rothschild, Hart, Stevens & Barry, counsel for Sellers, dated the Closing Date, that Sellers are each a corporation validly organized, existing and in good standing under the laws of Illinois; Sellers have full power and authority to carry out the transactions provided for in this Agreement; all corporate and other proceedings required to be taken by Sellers to authorize this Agreement and the transactions provided for in this Agreement have been validly taken; this Agreement has been duly executed and

delivered by each of the Sellers and Individual Parties and is the valid and enforceable obligation of each of the Sellers and Individual Parties in accordance with its terms; no consent or authorization of any governmental authority is required, as to the Sellers, as a condition precedent to the consummation of the transactions provided for in this Agreement; the instruments delivered pursuant to Section 11.1.1 are in due and proper form and are valid and enforceable instruments effectively conveying, assigning or transferring all of the Conveyed Property to Buyer in accordance with the terms of this Agreement; Sellers have, and will transfer to Buyer upon delivery of the above mentioned instruments of transfer, good title to all of the Conveyed Property subject only to encumbrances permitted by Section 4.5 (except that such counsel shall not be required to express an opinion as to title to real estate covered by the Report on Title referred to in Section 11.1.2); such counsel knows of no adverse action, suit or proceeding pending or threatened against or affecting Sellers or their properties or businesses except for the actions set forth in footnote 5 to the Financial Statements referred to in Section 4.2; and non-compliance with the Uniform Commercial Code - Bulk Transfers in connection with the transactions contemplated by this Agreement will not render any such transaction void or voidable, except as to creditors of Sellers at the Closing Date as provided by the Code.

11.1.5 Such other documents as may, in the opinion of attorneys for Buyer, be necessary to transfer to Buyer all of the Conveyed Property.

11.1.6 Possession of all of the Conveyed Property.

11.2 Buyer shall deliver to Sellers the following:

11.2.1 A certified check payable to the order of Sellers in the sum of $1,050,000 in Chicago Clearing House funds less an amount equal to 13/12ths of the 1965 real estate taxes on the Fixed Assets (the $50,000 earnest money deposit made by Buyer on December 12, 1966 shall be deemed to be paid to Sellers in respect to the purchase price of the Fixed Assets).

11.2.2 An opinion of Messrs. Sidley, Austin, Burgess & Smith, attorneys for Buyer, dated the Closing Date, that Buyer is a corporation validly organized, existing and in good standing under the laws of Illinois; Buyer has full power and authority to carry out the transactions provided for in this Agreement; all corporate and other proceedings required to be taken by Buyer to authorize this Agreement and the transactions provided for herein have been validly taken; and this Agreement has been duly executed and delivered by Buyer and is the valid and enforceable obligation of Buyer in accordance with its terms.

12. Post-Closing Payment of Purchase Price Balance. Within 10 days after determination of the amount specified by Section 10.1.2 Buyer will deliver to Sellers a certified check payable in Chicago Clearing House funds to the order of Sellers in an amount equal to the net book value of the Inventory determined as provided in Section 10.1.2.

13. Actions of Sellers after Closing Date. After the Closing Date, Sellers will:

13.1 Promptly change Atlas' corporate name to avoid, in the sole opinion of Buyer, any confusion with Atlas' present name, and Atlas shall not thereafter itself use, or permit any other corporation to use its present corporate name or any corporate name causing, in the sole opinion of Buyer, confusion with its present corporate name.

13.2 Cooperate with Buyer and use its best efforts promptly to deliver to Buyer possession of all books, records and papers of Sellers relative to manufacturing, procurement, sales, advertising and sales promotion of Sellers' products.

13.3 Reimburse Buyer for all costs incurred by Buyer in making good any breach of warranty claimed by reason of any defect upon any products either shipped by Sellers prior to, or constituting a finished product sold to Buyer on, the Closing Date, it being understood however that Buyer has not hereby assumed any liability for any such breach of warranty.

13.4 Seller will use its best efforts to persuade such of its employees as Buyer shall designate to enter the employment of Buyer.

13.5 As soon as possible after the receipt of the 1966 real estate tax bill, relative to the Fixed Assets, Sellers will pay to Buyer 13/12ths of the amount by which the 1966 bill exceeds the comparable 1965 bill.

13.6 Sellers will pay all fees of James R. Ogborn & Company.

14. Continuing Obligations.

14.1 Seller shall remain liable for all accounts and notes payable, salaries, commissions, and taxes, whether on property, sales, income or otherwise, due or accrued as of the Closing Date and for any and all other costs or liabilities incurred by it prior to the Closing Date, whether known or unknown at such time and whether contingent or otherwise, or thereafter incurred by Sellers, including without limiting the foregoing all costs of the Inventory, including Inventory in transit on the Closing Date.

14.2 Sellers and the Individual Parties jointly and severally agree to indemnify and hold Buyer harmless from and against all losses, claims, damages, costs and expenses arising out of any failure of performance of any covenant of any of them contained in this Agreement or arising out of the fact that any representation and warranty of any of them contained herein shall be untrue or incorrect or shall be alleged by any person not a party to this Agreement to be untrue or incorrect.

14.3 All funds received by Buyer after the Closing Date as a result of shipments made to customers by Sellers prior to the Closing Date shall be turned over to Sellers as soon as practicable after such receipt.

14.4 Buyer agrees to assume the liabilities of Sellers under the purchase orders relating to the capping machines described in Section 3.5; under a purchase order (No. 1216 to Norman Machine Co.) for a small South Bend lathe, and, as to transactions on and after the Closing Date, under the labor contract described in Section 4.10.

14.5 Buyer agrees to indemnify and hold Sellers harmless from and against all losses, claims, damages, costs and expenses arising out of the operation by Buyer after the Closing Date of the Conveyed Property (including the use of Atlas' corporate name).

14.6 During the period of five years after the Closing Date, the Individual Parties each agree that they will not, directly or indirectly, individually or as a partner, officer, director, stockholder or otherwise (i) in any part of Illinois lying north of the 38th parallel, (ii) in California, (iii) in Pennsylvania, or (iv) in any of the states of the United States bordering on the State of Illinois, engage in the production, manufacture or distribution of any products similar to or competitive with those now or heretofore manufactured or sold or under development by Sellers, nor will they engage in the distribution of any such products to any customer of Sellers during the 12 months period beginning on the Closing Date regardless of the geographic location of such customer; provided nothing herein shall prevent the Individual Parties from investing in securities of corporations listed on any registered stock exchange. In order to allow Buyer to determine whether its interests will be protected hereunder the Individual Parties each agree that they will disclose fully to Buyer upon its request (a) the nature of any employment or business venture undertaken by him, (b) any investment made by him in any corporation, partnership or other business venture, other than investments in securities of corporations listed on any registered stock exchange, and (c) any directorships held by him in any business corporation and the Individual Parties each agree that they will not enter into any secrecy agreement within such five year period prohibiting such disclosure.

14.7 Sellers and the Individual Parties agree that they will at any time after the Closing Date, upon the request of the Buyer,do, execute, acknowledge and deliver, or cause to be done, executed, acknowledged and delivered all such further acts, deeds, assignments, transfers, conveyances, powers of attorney and assurances as may be required for the better assigning, transferring, conveying, assuring and conveying to Buyer the Conveyed Property.

15. Nature and Survival of Representations. All representations and warranties made in this Agreement by Buyer, Sellers or the Individual Parties shall survive the execution of this Agreement and the sale of Conveyed Property and shall not be considered to have merged in any instrument of conveyance, assignment or transfer delivered pursuant to this Agreement.

16. Parties in Interest. This Agreement shall be binding upon and inure to the benefit of the successors and assigns of each of the Parties hereto.

17. Governing Law. This Agreement is delivered in Illinois and shall be governed by and construed and enforced in accordance with the laws of Illinois.

18. Notices. All notices, requests, demands and other communications under this Agreement shall be in writing and shall be deemed to have been duly given if delivered or if sent by registered or certified mail, postage prepaid:

18.1 If to Sellers to

Atlas Tube Company and
Da-Kay Enterprises, Inc.
c/o Rothschild, Hart, Stevens & Barry
105 South La Salle Street
Chicago, Illinois

18.2 If to Buyer to

J. L. Clark Manufacturing Co.
2300 Sixth Street
Rockford, Illinois
Attention: Office of the President

18.3 If to Individual Parties to

J. C. Steiner
Richard J. Steiner
George F. Steiner
Georgiana Steiner
c/o Rothschild, Hart, Stevens & Barry
105 South La Salle Street
Chicago, Illinois

19. Return of Earnest Money. In the event that the purchase and sale of the Conveyed Property shall not be consummated prior to February 2, 1967 for any reason other than a default by the Buyer,, the $50,000 earnest money deposit made by Buyer with the letter agreement dated December 12, 1966, shall be paid by Sellers upon demand to Buyer.

20. This Agreement may be executed in one or more counterparts, each of which shall be deemed an original, but all of which together shall constitute one and the same instrument.

IN WITNESS WHEREOF, the parties hereto have executed this Agreement this 6th day of January, 1967.

SELLERS:

ATLAS TUBE COMPANY

ATTEST:

Richard J. Steiner
Secretary

By J. C. Steiner Jr.
President

DA-KAY ENTERPRISES, INC.

ATTEST:

Jane R. Steiner
Secretary

By Richard J. Steiner
President

BUYER:

J. L. CLARK MANUFACTURING CO.

ATTEST:

A. V. Gage
Secretary

By Frank L. White
President

INDIVIDUAL PARTIES:

J. C. Steiner (L.S.)
J. C. Steiner

Richard J. Steiner (L.S.)
Richard J. Steiner

George F. Steiner (L.S.)
George F. Steiner

(L.S.)
Georgiana Steiner

AMERICAN LAND TITLE ASSOCIATION OWNER'S POLICY
STANDARD FORM A — CENTRAL REGION — 1962

CHICAGO TITLE AND TRUST COMPANY

a corporation of Illinois, herein called the Company, for a valuable consideration, hereby insures the party named in Schedule A, hereinafter called the Insured, the heirs, devisees, personal representatives of such Insured, or, if a corporation, its successors by dissolution, merger or consolidation, against loss or damage not exceeding the amount stated in Schedule A, together with costs, attorneys' fees and expenses which the Company may become obligated to pay as provided in the Conditions and Stipulations hereof, which the Insured shall sustain by reason of:

1. Any defect in or lien or encumbrance on the title to the estate or interest covered hereby in the land described or referred to in Schedule A, existing at the date hereof, not shown or referred to in Schedule B or excluded from coverage in Schedule B or in the Conditions and Stipulations; or

2. Lack of a right of access to and from the land;

all subject, however, to the provisions of Schedules A and B and to the Conditions and Stipulations hereto annexed; all as of the date of this policy.

In Witness Whereof, CHICAGO TITLE AND TRUST COMPANY has caused this policy to be signed and sealed as of the date of policy shown in Schedule A, the policy to become valid when countersigned by an authorized signatory.

CHICAGO TITLE AND TRUST COMPANY

By:

Paul W. Goodrich
President.

ATTEST:

A. Edmund Peterson
Secretary.

CHICAGO TITLE AND TRUST COMPANY
CORPORATE
SEAL
CHICAGO, ILLINOIS

IMPORTANT

This policy necessarily relates solely to the title as of the date of the policy. In order that a purchaser of the real estate described herein may be insured against defects, liens or encumbrances, this policy should be reissued in the name of such purchaser.

ALTA-A 1962 OWNERS FORM

Form 1823

R-7-64

SCHEDULE A

Number		Date of Policy	Amount of Policy
393036	DuPage	February 2, 1967	$450,000.00

1. Name of Insured.

   J. L. CLARK MANUFACTURING CO., A CORPORATION OF ILLINOIS

2. The estate or interest in the land described or referred to in this schedule covered by this policy is:

   Fee Simple

3. Title to the estate or interest covered by this policy at the date hereof is vested in the Insured.

4. The land herein described is encumbered by the following mortgage or trust deed:

   NONE.

   and the mortgages or trust deeds, if any, shown in Schedule B.

5. The land referred to in this policy is described as follows:

   Lot 1 in Frank Lopata Resubdivision of Lots 10, 11 and 12 in the Resubdivision of Lots 8 to 13, a subdivision in Ellsworth Park Unit Number 3 and Lot 24 in Ellsworth Park Unit Number 5, being a subdivision of part of the Southwest quarter and the Southeast quarter of Section 12, Township 38 North, Range 10, East of the Third Principal Meridian, according to the plat thereof recorded August 13, 1965 as Document R65-30445, in DuPage County, Illinois

SCHEDULE B

This policy does not insure against loss or damage by reason of the encumbrance, if any, shown in Schedule A, which encumbrance is expressly made an exception forming part of this Schedule B, nor does it insure against loss or damage by reason of the following exceptions:

General Exceptions:

(1) Rights or claims of parties in possession not shown of record.
(2) Encroachments, overlaps, boundary line disputes, and any matters which would be disclosed by an accurate survey and inspection of the premises.
(3) Easements and claims of easement not shown of record.
(4) Mechanics' or materialmen's liens or other statutory liens for labor or material not shown of record.
(5) Taxes or special assessments which are not shown as existing liens by the public records.
(6) Rights of dower, homestead or other marital rights of the spouse, if any, of any individual insured.

Special Exceptions (including the encumbrance, if any, shown in Schedule A):

1. Building line 50 feet on the Southerly line of premises in question as shown on the plats of Ellsworth Park Unit Number 3, recorded as Document 907360 and the Resubdivision of Lots 8 to 13 in Ellsworth Park Unit Number 3.

2. Utility easement of 10 feet as shown on the plats of Ellsworth Park Unit Number 3, recorded as Document 907360 and the Resubdivision of Lots 8 to 13 in Ellsworth Park Unit Number 3.

3. Existing leases, if any.

4. Building line 50 feet on the Southerly line of premises in question of Frank Lopata Resubdivision of Lots 10, 11 and 12 in the Resubdivision of Lots 8 to 13 in Ellsworth Park Unit Number 3 and Lot 24 in Ellsworth Park Unit Number 5, recorded as Document R65-30445.

5. Utility easement of 10 feet along the Northerly and the Northwesterly lines of premises in question as shown on the plat of Frank Lopata Resubdivision, aforesaid.

6. Easement over the Northerly and Northwesterly 10 feet of premises in question for installation and maintaining all equipment necessary for serving premises in question and other property with telephone, electric and gas service, together with the right to overhang aerial service wires over any part of premises in question and also with the right of access thereto, as granted to Illinois Bell Telephone Company, Commonwealth Edison Company and Northern Illinois Gas Company and their respective successors and assigns, and as shown on the plat of Frank Lopata Resubdivision, aforesaid.

7. Taxes for the years 1966 and 1967.

Countersigned

Irene L. Laundt

Authorized Signatory

Schedule B of this Policy consists of 1 pages

CONDITIONS AND STIPULATIONS

1. Definition of Terms

The following terms when used in this policy mean:

(a) "land": the land described, specifically or by reference, in Schedule A and improvements affixed thereto which by law constitute real property;

(b) "public records": those records which impart constructive notice of matters relating to said land;

(c) "knowledge": actual knowledge, not constructive knowledge or notice which may be imputed to the Insured by reason of any public records; and

(d) "date": the effective date.

2. Exclusions from the Coverage of this Policy

This policy does not insure against loss or damage by reason of the following:

(a) The refusal of any person to purchase, lease or lend money on the estate or interest covered hereby in the land described in Schedule A.

(b) Any law, ordinance or governmental regulation (including but not limited to building and zoning ordinances) restricting or regulating or prohibiting the occupancy, use or enjoyment of the land, or regulating the character, dimensions, or location of any improvement now or hereafter erected on said land, or prohibiting a separation in ownership or a reduction in the dimensions or area of any lot or parcel of land.

(c) Governmental rights of police power or eminent domain unless notice of the exercise of such rights appears in the public records at the date hereof.

(d) Title to any property beyond the lines of the land expressly described or referred to in Schedule A, or title to areas within or rights or easements in any abutting streets, roads, avenues, lanes, ways or waterways (except to the extent the right of access to and from said land is covered by the insuring provisions of this policy), or the right to maintain therein vaults, tunnels, ramps or any other structure or improvement, unless this policy specifically provides that such titles, rights or easements are insured.

(e) Defects, liens, encumbrances, adverse claims against the title as insured or other matters (1) created, suffered, assumed or agreed to by the Insured; or (2) known to the Insured either at the date of this policy or at the date such Insured acquired an estate or interest insured by this policy and not shown by the public records, unless disclosure thereof in writing by the Insured shall have been made to the Company prior to the date of this policy; or (3) resulting in no loss to the Insured; or (4) attaching or created subsequent to the date hereof.

(f) Loss or damage which would not have been sustained if the Insured were a purchaser for value without knowledge.

3. Defense and Prosecution of Actions — Notice of Claim to be Given by the Insured

(a) The Company, at its own cost and without undue delay, shall provide for the defense of the Insured in all litigation consisting of actions or proceedings commenced against the Insured, which litigation is founded upon a defect, lien or encumbrance insured against by this policy, and may pursue such litigation to final determination in the court of last resort.

(b) In case any such action or proceeding shall be begun, or defense interposed, or in case knowledge shall come to the Insured of any claim of title or interest which is adverse to the title as insured, or which might cause loss or damage for which the Company shall or may be liable by virtue of this policy, the Insured shall notify the Company thereof in writing. If such notice shall not be given to the Company within ten days of the receipt of process or pleadings or if the Insured shall not, in writing, promptly notify the Company of any defect, lien or encumbrance insured against which shall come to the knowledge of the Insured, then all liability of the Company in regard to the subject matter of such action, proceeding or matter shall cease and terminate; provided, however, that failure to notify shall in no case prejudice the claim of any Insured unless the Company or proceeding or do any other act which in its opinion may be necessary or desirable to establish the title as insured; and the Company may take any appropriate action under the terms of this policy whether or not it shall be liable thereunder and shall not thereby concede liability or waive any provision of this policy.

(d) In all cases where this policy permits or requires the Company to prosecute or provide for the defense of any action or proceeding, the Insured shall secure to it the right to so prosecute or provide defense in such action or proceeding, and all appeals therein, and permit it to use, at its option, the name of the Insured for such purpose. Whenever requested by the Company the Insured shall give the Company all reasonable aid in any such action or proceeding, in effecting settlement, securing evidence, obtaining witnesses, or prosecuting or defending such action or proceeding, and the Company shall reimburse the Insured for any expense so incurred.

4. Notice of Loss — Limitation of Action

In addition to the notices required under paragraph 3(b), a statement in writing of any loss or damage for which it is claimed the Company is liable under this policy shall be furnished to the Company within sixty days after such loss or damage shall have been determined and no right of action shall accrue to the Insured under this policy until thirty days after such statement shall have been furnished, and no recovery shall be had by the Insured under this policy unless action shall be commenced thereon within five years after expiration of said thirty day period. Failure to furnish such statement of loss or damage, or to commence such action within the time hereinbefore specified, shall be a conclusive bar against maintenance by the Insured of any action under this policy.

5. Option to Pay, Settle or Compromise Claims

The Company shall have the option to pay or settle or compromise for or in the name of the Insured any claim insured against or to pay the full amount of this policy and such payment or tender of payment, together with all costs, attorneys' fees and expenses which the Company is obligated hereunder to pay, shall terminate all liability of the Company hereunder.

6. Payment of Loss

(a) The liability of the Company under this policy shall in no case exceed, in all, the actual loss of the Insured and costs and attorneys' fees which the Company may be obligated hereunder to pay.

(b) The Company will pay, in addition to any loss insured against by this policy, all costs imposed upon the Insured in litigation carried on by the Company for the Insured, and all costs and attorneys' fees in litigation carried on by the Insured with the written authorization of the Company.

(c) No claim for damages shall arise or be maintainable under this policy (1) if the Company, after having received notice of an alleged defect, lien or encumbrance not excepted or excluded herein removes such defect, lien or encumbrance within a reasonable time after receipt of such notice; or (2) for liability voluntarily assumed by the Insured in settling any claim or suit without written consent of the Company.

(d) All payments under this policy, except payments made for costs, attorneys' fees and expenses, shall reduce the amount of the insurance pro tanto and no payment shall be made without producing this policy for endorsement of such payment unless the policy be lost or destroyed, in which case proof of such loss or destruction shall be furnished to the satisfaction of the Company.

(e) When liability has been definitely fixed in accordance with the conditions of this policy the loss or damage shall be payable within thirty days thereafter.

7. Liability Noncumulative

It is expressly understood that the amount of this policy is reduced by any amount the Company may pay under any policy insuring the Schedule A, and the amount so paid shall be deemed a payment to the Insured under this policy.

8. Coinsurance and Apportionment

(a) In the event that a partial loss occurs after the Insured makes an improvement subsequent to the date of this policy, and only in that event, the Insured becomes a co-insurer to the extent hereinafter set forth.

If the cost of the improvement exceeds twenty per centum of the amount of this policy, such proportion only of any partial loss established shall be borne by the Company as one hundred twenty per centum of the amount of this policy bears to the sum of the amount of this policy and the amount expended for the improvement. The foregoing provisions shall not apply to costs and attorneys' fees incurred by the Company in prosecuting or providing for the defense of actions or proceedings in behalf of the Insured pursuant to the terms of this policy or to costs imposed on the Insured in such actions or proceedings, and shall apply only to that portion of losses which exceed in the aggregate ten per cent of the face of the policy.

Provided, however, that the foregoing coinsurance provisions shall not apply to any loss arising out of a lien or encumbrance for a liquidated amount which existed on the date of this policy and was not shown in Schedule B; and provided further, such coinsurance provisions shall not apply to any loss if, at the time of the occurrence of such loss, the then value of the premises, as so improved, does not exceed one hundred twenty per centum of the amount of this policy.

(b) If the land described or referred to in Schedule A is divisible into separate and noncontiguous parcels, or if contiguous and such parcels are not used as one single site, and a loss is established affecting one or more of said parcels but not all, the loss shall be computed and settled on a pro rata basis as if the face amount of this policy was divided pro rata as to the value on the date of this policy of each separate independent parcel to the whole, exclusive of any improvements made subsequent to the date of this policy, unless a liability or value has otherwise been agreed upon as to each such parcel by the Company and the Insured at the time of the issuance of this policy and shown by an express statement herein or by an endorsement attached hereto.

9. Subrogation upon Payment or Settlement

Whenever the Company shall have settled a claim under this policy, all right of subrogation shall vest in the Company unaffected by any act of the Insured, and it shall be subrogated to and be entitled to all rights and remedies which the Insured would have had against any person or property in respect to such claim had this policy not been issued. If the payment does not cover the loss of the Insured, the Company shall be subrogated to such rights and remedies in the proportion which said payment bears to the amount of said loss. If loss should result from any act of the Insured, such act shall not void this policy, but the Company, in that event, shall be required to pay only that part of any losses insured against hereunder which shall exceed the amount, if any, lost to the Company by reason of the impairment of the right of subrogation. The Insured, if requested by the Company, shall transfer to the Company all rights and remedies against any person or property necessary in order to perfect such right of subrogation, and shall permit the Company to use the name of the Insured in any transaction or litigation involving such rights or remedies.

10. Policy Entire Contract

Any action or actions or rights of action that the Insured may have or may bring against the Company arising out of the status of the title insured herein must be based on the provisions of this policy.

No provision or condition of this policy can be waived or changed except by writing endorsed hereon or attached hereto signed by the President, a Vice President, the Secretary, an Assistant Secretary or other validating officer of the Company.

11. Notices, Where Sent

MORE THAN A CENTURY OF EXPERIENCE IN PROPERTY PROTECTION

Title to this property INSURED BY CHICAGO TITLE AND TRUST COMPANY

CAPITAL AND RESERVES IN EXCESS OF SIXTY MILLION DOLLARS

111 WEST WASHINGTON STREET, CHICAGO, ILLINOIS 60602

120 E. Liberty Dr., Wheaton • 110 N. Ottawa St., Joliet • 15 S. County St., Waukegan
105 N. Monroe St., Peoria • 15 E. Washington, Belleville • 113 S. 3rd St., Geneva
108 N. Main St., Sycamore • 241 N. Main St., Edwardsville
Regional Offices, Agents and Representatives serving every Illinois county.
Title insurance on property in other states through subsidiary companies.

American Land Title Association
Owner's Policy
Standard Form A
Central Region — 1962

OWNERS TITLE INSURANCE POLICY

CHICAGO TITLE AND TRUST COMPANY

Appendix J

ASSET PURCHASE AGREEMENT

THIS AGREEMENT, made as of the 10th day of November, 1997 between J.L. Clark, Inc., a Delaware corporation with a place of business at 2323 Sixth Street, Rockford, Illinois 61125 (the "Vendor") and CCL Tube Corporation, a Delaware corporation with a registered address at 1105 N. Market Street, P.O. Box 1347, Wilmington, Delaware 19899 (the "Purchaser");

WITNESSES THAT:

WHEREAS the Vendor wishes to sell to the Purchaser and the Purchaser wishes to buy from the Vendor certain assets of the Vendor's "Clark Tube" division;

NOW THEREFORE:

For good and valuable consideration, the parties agree as follows:

ARTICLE 1 - INTERPRETATION

1.1 Where used herein the following terms shall have the respective meanings set out below:

(a) "Accounts Payable" means the trade accounts payable and only those accrued expenses of the Business at the Date of Closing listed in Schedule 4.1(e);

(b) "Accounts Receivable" means the trade accounts receivable of the Business on the Date of Closing listed in Schedule 3.1(d);

(c) "Books and Records of the Business" means all operations or other manuals pertaining to the Business or the Division, product and component specifications, lists of customers of and suppliers to the Business or the Division, sales catalogues, advertising material, manufacturing data, production records, inventory and supply records, equipment manufacturer records, employee manuals and personnel records (and the copyright pertaining thereto, and all other records pertaining to the Business or the Division (together with, in the case of any such information that is stored electronically, the media on which same is stored);

(d) "Business Day" means a day other than a Saturday, Sunday or any statutory holiday in the State of Illinois;

(e) "Business" means the business carried on by the J.L Clark Tube Division of J.L. Clark, Inc. consisting of the manufacture and sale of collapsible metal tubes but excluding the work performed and products produced and sold pursuant to the Kutterer Contract;

(f) "Closing Date" or "Date of Closing" means November 17th, 1997, or such other date as the parties may agree;

(g) "Data Processing Services" has the meaning set forth in Article 16;

(h) "Data Term" has the meaning set forth in Article 16;

(i) "Division" means the J.L. Clark Tube Division of J.L. Clark, Inc.;

(j) "Employees" has the meaning set forth in Section 15.1;

(k) "Environment Laws" has the meaning set forth in Section 7.17;

(l) "Excluded Liabilities" has the meaning set forth in Section 4.3;

(m) "Inventories" means all inventories of the Business determined in accordance with Section 5.6 including work in process and finished goods inventories, raw materials, packaging, supplies, spare parts and materials on hand at the Plant, all as described and listed in Schedule 5.6;

(n) "Kutterer Contract" has the meaning set forth in Section 3.1;

(o) "Lease" means the lease attached hereto as Schedule 13.2(a);

(p) "Non Competition Agreement" means the agreement attached hereto as Schedule 13.2(b);

(q) "Obsolete Inventories" are those Inventories defined as such in Section 5.6;

(r) "Plant" means the Vendor's manufacturing plant located at 2300 Wisconsin Avenue, Downers Grove, Illinois 60515;

(s) "Prepaid Expenses" means those prepaid expenses of the Business that are transferrable to the Purchaser, as listed in Schedule 3.1(c);

(t) "Property Leases" means the leases of the Business defined in Section 4.1(a);

(u) "Purchase Price" shall have the meaning set out in Section 5.1 of this Agreement;

(v) "Purchased Assets" shall have the meaning set out in Section 3.1 of this Agreement; and

(w) "Time of Closing" means 10:00 o'clock in the morning (Chicago time) on the Closing Date.

1.2 "Agreement", "this Agreement", "hereto", "hereof", "herein", "hereunder" and similar expressions refer to this agreement including its Schedules and not to any particular Article, Section, paragraph, clause or other portion of this agreement and include every amendment or instrument supplementary to this document made in accordance with Article 21 hereof.

1.3 All dollar amounts referred to herein are in United States Dollars.

1.4 The expression "persons" includes individuals, partnerships, firms, joint ventures, syndicates, associations, trusts, companies, corporations and all other forms of business organizations.

1.5 The headings of all Articles hereof are inserted for convenience of reference only, are not intended to be full or accurate descriptions of the contents hereof and shall not be considered part of this Agreement or affect or be considered in the construction or the interpretation hereof.

1.6 Words importing the singular number only shall include the plural and vice versa.

ARTICLE 2 - SCHEDULES

2.1 The following are the Schedules which are incorporated in this Agreement by reference and deemed to be a part hereof:

Schedule 3.1(a)	- Equipment
Schedule 3.1(c)	- Prepaid Expenses
Schedule 3.1(d)	- Accounts Receivable
Schedule 3.1(e)	- Patents, Trade Marks & Licenses
Schedule 4.1(a)	- Property Leases
Schedule 4.1(b)	- Open Purchase Orders

Schedule 4.1(c)	- Contracts
Schedule 4.1(d)	- Permits
Schedule 4.1(e)	- Accounts Payable and Accrued Liabilities
Schedule 5.6	- Inventories
Schedule 7.6	- Financial Statements
Schedule 7.7	- Material Adverse Changes
Schedule 7.9	- Litigation
Schedule 7.13	- Employment Agreements
Schedule 7.14	- Labor Disputes
Schedule 7.17	- Environmental Claims
Schedule 7.21	- Volume Rebates
Schedule 7.22	- Customer List
Schedule 13.2(a)	- Real Property Lease
Schedule 13.2(b)	- Non Competition Agreement
Schedule 15.1	- Written Severance Plans & Obligations

ARTICLE 3 - PURCHASED ASSETS

3.1 The Vendor agrees to sell, assign, transfer and convey to the Purchaser and the Purchaser agrees to purchase from the Vendor the following property and assets of the Division (the "Purchased Assets") as, at and from 11:59 p.m., Saturday November 15th, 1997:

(a) all machinery, equipment including, without limitation, parts, cars, vehicles, jigs, dies, moulds, tools, handling equipment, computers, computer hardware and software, furniture, furnishings and accessories of all kinds owned by the Vendor and wheresoever located used in connection with the Business, whether or not in the possession of others for purposes of repairs or maintenance, all as listed in Schedule 3.1 (a) - Equipment;

(b) the Inventories;

(c) the Prepaid Expenses;

(d) the Accounts Receivable of the Business listed in Schedule 3.1(d);

(e) the ownership and/or full benefit (as applicable) of the patents, trade marks and licenses of the Business listed in Schedule 3.1(e);

(f) the Books and Records of the Business;

(g) the benefit of the Non-Competition Agreement; and

(h) the benefit of the contracts referred to in Sections 4.1 (a), (b) and (c),

but expressly excluding any interest in the Vendor's pension fund surplus (if any) and any interest in the Vendor's contract with Kunststoffwerk Kutterer (the "Kutterer Contract") including, without limitation, any assets, profits, accounts receivable, purchase orders, cash and inventories related to the Kutterer Contract.

ARTICLE 4 - ASSIGNMENT TO PURCHASER

4.1 The Vendor agrees to assign to the Purchaser and the Purchaser agrees to accept from the Vendor as of and from 11:59 p.m., Saturday November 15th, 1997 an assignment of and assume only the following obligations, liabilities, rights and privileges of the Vendor:

(a) the Vendor's interest in the leases to moveable property employed in the Business (but excluding all leases of passenger cars) described in Schedule 4.1(a) "Property Leases";

(b) the full benefit of unfilled customer orders received by the Vendor in connection with the Business and to be completed and filled by the Division at the Plant as listed in Schedule 4.1(b);

(c) those contracts of the Business listed in Schedule 4.1(c), and any licenses listed in Schedule 3.1(e);

(d) to the extent that they are assignable, all consents, registrations, permits, licenses or authorizations issued with respect to the Business by any governmental authority including those set out in Schedule 4.1(d) - Permits, provided that the Vendor shall be entitled to retain its air pollution permits for the Plant so long as the retention of such licenses by the Vendor shall not restrict or deprive the Purchaser of the right to operate the Business at the Plant without the need to acquire a separate permit in its own name;

(e) the Accounts Payable, to the extent they do not exceed the Purchase Price;

but expressly excluding all accounts payable, accrued expenses and other obligations and liabilities relating to or arising under the Kutterer Contract.

4.2 The Purchaser shall discharge, perform and fulfil in accordance with their terms all obligations arising and referable to the period after the Closing Date or that

accrue after the Closing Date under the leases, contracts, purchase orders, commitments and other documents and instruments described in subsection 4.1(a), (b), (c) and (d).

4.3 Except as set out in Section 4.1(e), Section 4.2, Section 5.1 and Article 15, Purchaser will not assume or be liable to pay, satisfy, discharge, perform or fulfil any debts, obligations or liabilities of any kind whatsoever, whether monetary, performance or otherwise (all such unassumed debts, obligations and liabilities being referred to herein as "Excluded Liabilities"), whether existing or contingent of the Business (or the operation thereof) or the Vendor.

ARTICLE 5 - PURCHASE PRICE AND ALLOCATION THEREOF

5.1 The purchase price (the "Purchase Price") payable to the Vendor on the Closing Date for the Purchased Assets shall be the sum of the values of the Purchased Assets set forth in and determined pursuant to Section 5.2, subject to adjustment pursuant to Section 5.3. The Purchase Price shall be paid on the Closing Date by (a) the assumption by the Purchaser of the Accounts Payable and (b) as to the balance of the Purchase Price, by the transfer of immediately available funds to an account designated by the Vendor and delivered at the Time of Closing.

5.2 For purposes of payment on the Closing Date and subject to adjustment pursuant to Section 5.3, the Purchase Price shall be allocated among the Purchased Assets as follows and the Vendor and Purchaser shall file their respective tax returns on the basis of such allocation and shall, if requested by the other, provide evidence of such filing:

(a)	As to the assets set forth in Section 3.1(a):	1,200,000
(b)	As to the assets set forth in Section 3.1(b):	900,045
(c)	As to the assets set forth in Section 3.1(c):	15,000
(d)	As to the assets set forth in Section 3.1(d):	*1,000,355*
(e)	As to the assets set forth in Schedule 3.1(e) and Subsections 3.1(f),(g) &(h):,	300,000

The Accounts Payable shall, for purposes of payment of the Purchase Price on the Date of Closing and subject to adjustment under Section 5.3, be assumed at $520,663.

5.3 The Purchase Price shall be subject to adjustment in accordance with the following:

(a) As promptly as practicable following the Closing Date (but not later than 60 days after the Closing Date), the Vendor shall deliver to the Purchaser a certificate (the "Valuation Certificate") signed by the chief financial officer of the Vendor setting forth the following adjustments to the Purchase Price:

(i) the Purchase Price of the assets listed in Section 3.1(a) shall be adjusted by any amount that the net book value thereof (determined according to the Vendor's historical practices) as of the Date of Closing exceeds or falls short of the sum of $975,000;

(ii) the Purchase Price of the Inventory shall be adjusted by the amount that the value thereof as of the Date of Closing determined in accordance with Section 5.6 exceeds or falls short of the sum of $900,045;

(iii) the Purchase Price of the Prepaid Expenses shall be adjusted by any amount that the net book value thereof as of the Date of Closing exceeds or falls short of the sum of $15,000;

(iv) The Purchase Price of the Accounts Receivable shall be adjusted by any amount that the face value thereof as of the Date of Closing exceeds or falls short of the sum of $1,044,454, less a reserve of $44,099;

(v) The cash portion of the Purchase Price paid by the Purchaser on the Date of Closing pursuant to Section 5.1 shall be adjusted by any amount that the aggregate of the Accounts Payable assumed by the Purchaser on the Date of Closing exceeds or falls short of the sum of $520,663.

(b) Promptly following the receipt of the Valuation Certificate, the Purchaser shall review the same and, within 30 days after the date of such receipt, may deliver to the Vendor a notice in writing (signed by the Purchaser's authorized officer) setting forth its objections to the Valuation Certificate, together with a summary of the reasons therefor and calculations which, in its view, are necessary to eliminate such objections. In the event the Purchaser does not so object within such 30 day period, the Valuation Certificate shall be final and binding for the purposes of this Section 5.3.

(c) In the event the Purchaser so objects within such 30 day period, the Purchaser and the Vendor shall use their reasonable efforts in good faith to resolve by written agreement (the "Agreed Adjustments") any differences as to the Valuation Certificate and, in the event the Vendor and the Purchaser so resolve any such differences, the Valuation Certificate as adjusted by the Agreed Adjustments shall be final and binding for purposes of this Section 5.3.

(d) In the event any objections raised by the Purchaser are not resolved by the Agreed Adjustments within the 30 day period next following such 30 day period, then the Purchaser and the Vendor shall submit the objections that are then unresolved to a national accounting firm acceptable to both the Vendor and the Purchaser and such firm (the "Accounting Firm") shall be directed by the Vendor and the Purchaser to resolve the unresolved objections as promptly as reasonably practicable and to deliver written notice to each of the Purchaser and the Vendor setting forth its resolution of the disputed matters. The Valuation Certificate after giving effect to any Agreed Adjustments and to the resolution of disputed matters by the Accounting Firm, shall be final and binding for the purposes of this Section 5.3.

(e) The parties hereto shall make available to the Purchaser, the Vendor, and, if applicable, the Accounting Firm, such books, records and other information (including work papers) as any of the foregoing may reasonably request to prepare or review the Valuation Certificate or any matters submitted to the Accounting Firm. The fees and expenses of the Accounting Firm hereunder shall be paid 50% by the Purchaser and 50% by the Vendor.

(f) Promptly (but not later than 5 business days) after the Valuation Certificate becomes final and binding as set forth in this Section 5.3, the Vendor shall pay to the Purchaser the amount, if any, by which the aggregate of the adjustments set forth on the Valuation Certificate is in the Purchaser's favor; and the Purchaser shall pay to the Vendor the amount, if any, by which the aggregate of the adjustments set forth on the Valuation Certificate is in the Vendor's favor.

5.4 The Purchase Price shall be allocated among the Purchased Assets as determined in Section 5.2 and adjusted by the final and binding Valuation Certificate, which the parties acknowledge to be the fair market value thereof. The parties agree to cooperate with each other in the preparation and filing of IRS Form 8594 and any reports required to be filed with the Internal Revenue Service in accordance with Section 1060 of the Internal Revenue Code with respect to the allocation of the Purchase Price among the Purchased Assets.

5.5 The Vendor will include in its 1997 income tax return the results of operations of the Business through the close of business on the Closing Date and the Vendor shall bear any income tax liability associated therewith. Each of the Vendor and the Purchaser agrees to furnish or cause to be furnished to the other such other assistance as may be reasonable in the circumstances in connection with income tax matters including, but not limited to, construction of an opening balance sheet for tax purposes as of the Closing Date, any audit or other proceedings related to the determination of any tax liabilities. In each case, the requesting party shall pay the reasonable costs and expenses of rendering such assistance to the other party.

5.6 Finished goods and work in process Inventories shall be valued at the lower of the Vendor's standard factory cost or net sales value. Raw material Inventories and packaging material Inventories shall be valued at the Vendor's acquisition cost. The parties shall jointly audit and settle the valuation of the obsolete inventories prior to the Closing Date. Obsolete inventories shall be valued at zero. The Purchaser shall use its commercially reasonable efforts to use up obsolete inventories over the six month period following the Date of Closing. The Purchaser shall pay the Vendor the fair market value of any such obsolete inventories used up over the said six month period. Any such obsolete inventories not so used shall be returned to Vendor at Vendor's cost or, at the Vendor's option, disposed of by the Purchaser at the Vendor's cost. All Inventories shall be described and listed in Schedule 5.6 to this Agreement.

ARTICLE 6 - DISPOSAL OF ASSETS NOT PURCHASED BY PURCHASER

6.1 Any assets of the Business not purchased by the Purchaser shall be identified by the Purchaser and shall be disposed of by the Vendor at its own cost in a legal and environmentally responsible manner.

ARTICLE 7 - REPRESENTATIONS AND WARRANTIES OF THE VENDOR

The Vendor represents and warrants to the Purchaser as follows and acknowledges that the Purchaser is relying upon such representations and warranties in connection with entering into this Agreement and completing the purchase of the Purchased Assets:

7.1 (a) The Vendor has been duly incorporated and is validly existing under the laws of the State of Delaware; and

(b) the Vendor has the corporate power and capacity to own and lease its property and to carry on its business, is duly qualified as a corporation to do business and holds all requisite licenses to carry on its business in the State of Illinois.

7.2 The Vendor has the corporate power and authority to enter into this Agreement and to perform its obligations hereunder.

7.3 (a) The entering into of this Agreement and the consummation by the Vendor of the transactions contemplated hereby will not constitute or result in: (i) a breach or violation of any of the terms of the certificate of incorporation, by-laws, or resolutions of the Vendor; or (ii) a breach or violation of, or a default under (with or without the giving of notice or the passage of time) or the creation of a lien, pledge, security interest, adverse claim or other encumbrance on the Purchased Assets, pursuant to any provision of any agreement, lease, contract, note, mortgage, indenture, lease, license or other

commitment of Vendor, or by which it is bound or a breach or violation of or a default under any law, judgment, decree or order applicable to the Vendor; and

(b) this Agreement has been duly executed and delivered by the Vendor and is a valid and binding obligation of the Vendor enforceable against it in accordance with its terms.

7.4 Subject to Section 7.5 the Purchased Assets are in good working order, are owned by the Vendor as the legal and beneficial owner thereof and free and clear of all mortgages, liens, charges, pledges, security interests, encumbrances or other claims whatsoever.

7.5 No person has any written or oral agreement, option, understanding or commitment or any right for the purchase from the Vendor of any of the Purchased Assets other than pursuant to purchase orders described in Schedule 4.1(b).

7.6 The unaudited internally prepared financial statements of the Division as at November 30, 1996 and August 31, 1997, copies of which having been delivered to the Purchaser and are annexed hereto as Schedule 7.6 - Financial Statements, present fairly the assets and liabilities of the Division at the date thereof and the results of the Division's operations for the periods then ended (except that the assets, liabilities, revenues and expenses related to the Kutterer Contract and parent company corporate charges have been eliminated from the August 31, 1997 financial statements) in accordance with generally accepted accounting principles as adopted in the United States of America, subject to normal year end adjustments listed in Schedule 7.6. Subject to the foregoing, the financial statements referred to herein represent a true and accurate statement of the financial condition of the Division as of the date of such statements.

7.7 Since December 1, 1996, there has been no material adverse change in the business, operations, affairs or financial condition of the Division except as set out in Schedule 7.7 - Material Adverse Changes.

7.8 The Books and Records of the Business relating to the Division are complete and accurate in all material respects and all financial transactions of the Division have been recorded in such books and records.

7.9 Except as set out in Schedule 7.9 - Litigation, there is no claim, action, suit or proceeding commenced, or to the knowledge of the Vendor pending or threatened, by or against the Vendor before any court, tribunal, administrative agency, governmental body, arbitrator or other dispute resolution forum, or any judgment, order, writ, injunction or decree (other than such as might be applicable generally to businesses in the industry of the Business) which could reasonably be expected to have a material adverse effect on the Business.

7.10 The contracts and leases referred to in Section 4.1 or set out in Schedules 4.1(a), (b) and (c) are in full force and effect and neither the Vendor nor, to the best of the knowledge of the Vendor, any other party thereto, is in material breach thereunder. True copies of the said agreements have been delivered to the Purchaser.

7.11 To the knowledge of the Vendor, the Vendor holds all material licenses, permits, consents and authorizations necessary to carry on the Business, in accordance with applicable laws and all of such licenses, permits, consents and authorizations are in full force and effect, and that all such authorizations and permits are listed in Schedule 4.1(d);

7.12 To the knowledge of the Vendor, the conduct of the Business is not in violation of any applicable law, rule, regulation or order;

7.13 Except as disclosed in Schedule 7.13 - Employment Agreements, there are no written or oral employment agreements providing for an annual salary in excess of $50,000 per annum, union, retirement or employee termination agreements or arrangements and benefit, pension or profit-sharing plans involving employees who report for work at the Plant, and true copies or, in the case or oral agreements, full descriptions of all such agreements and plans listed or set forth in the said Schedule have been delivered to the Purchaser. The Vendor has delivered to the Purchaser a list of all current employees of the Business, indicating their title, start date and salary or wages;

7.14 Except as set forth in Schedule 7.14, (a) no strikes or work stoppages have occurred since January 1, 1997, and (b) to the best of the Vendor's knowledge, none are pending or threatened and no labour practice complaints or charges (including with respect to discrimination or human rights violations) are pending or threatened in writing against the Vendor in connection with the Business.

7.15 There are no patents, trade marks, or licenses necessary to the operation of the Business, except for those patents, trade marks and licenses listed in Schedule 3.1(e). No director, officer, shareholder or employee of Vendor owns, directly or indirectly, in whole or in part, any patent, trademark, service mark or copyright which is being used in or is necessary to the conduct of the Business. To the knowledge of the Vendor, the conduct of the Business does not infringe upon the patents, trademarks, trade names or copyrights of any person.

7.16 All returns, declarations and other reports required to be filed by or with respect to the Vendor in respect of any income, sales, use, payroll, property or other taxes imposed by any taxing authority (domestic or foreign) relating to the Business have been timely filed or a request for extension has been made and all taxes shown as due thereon have either been paid or adequate provision for payment with respect to such taxes has been made.

7.17 Except as set forth and disclosed in Schedule 7.17, the Business does not violate in any material respect and is subject to no material liabilities under any applicable laws, by-laws, regulations, governmental decrees or ordinances (including, without limitation, all applicable federal, state and municipal laws, by-laws, regulations, decrees or ordinances with respect to the management, control, reporting, disposal and transportation of contaminants, pollutants, oil, hazardous materials and waste (collectively referred to herein as "Environmental Laws", which term, for purposes of this Agreement, shall be deemed to include liability and alleged liability to any third party under the Comprehensive Environmental Response, Compensation and Liability Act), and, for greater certainty and without limiting the generality of the foregoing:

(i) the Vendor is not aware of any unrectified spills, releases or discharges of oil, solvents or other hazardous or toxic substances or pollutants or contaminants on any of the real property or leased properties, past or present, of the Business;

(ii) the Vendor is not aware of any releases or discharges, by the Vendor in violation of Environmental Laws, of any hazardous or toxic substances or pollutants or contaminants into the air or into any municipal or other sewer or drain systems;

(iii) the Vendor is not aware of any underground storage vessels located on any of the real property or leased properties, past or present, of the Business;

(iv) the Vendor is not aware of any unrectified disposal of any solvents or other hazardous or toxic substances or pollutants or contaminants in contravention of Environmental Laws by the Vendor, its predecessors, its agents or employees on any of the real property or leased properties, past or present, of the Business; and

(v) the Vendor has not received written notice that it, its predecessors, agents or employees have violated any Environmental Laws;

7.18 There shall be no customer returns of finished goods Inventories, provided that the Purchaser shall, if directed by the Vendor, use its best efforts to correct, at the Vendor's cost, any defects in any such returned finished goods Inventory and reship the same at Vendor's cost to the customer in question;

7.19 All customer purchase orders set forth in Schedule 4.1(b) are on normal trade terms and contain no warranties, representations or indemnities except as provided in the ordinary course of the Business;

7.20 Since July 31, 1997, the Business has not acquired fixed assets or equipment for a consideration in excess of $50,000 or disposed of any such assets for proceeds in excess of $50,000;

7.21 Except as set forth in Schedule 7.21, the Vendor has not extended any volume rebate to any customers of the Business.

7.22 The list of customers of the Business attached hereto as Schedule 7.22 is a complete list of each customer of the Business setting out the address of such customer, the principle contact at such address, and the volume of sales to such customer in the twelve month period ending July 31, 1997. Since January 1, 1997 there has been no material termination or cancellation of, and no material modification or change in the Vendor's business relationship with any of such customers. The Vendor has no reason to believe that the benefit of any relationship with any such customers will not continue after the Date of Closing in the same manner as prior to the date hereof.

ARTICLE 8 - REPRESENTATIONS AND WARRANTIES OF THE PURCHASERS

The Purchaser represents and warrants to the Vendor as follows and acknowledges that the Vendor is relying upon such representations and warranties in connection with entering into this Agreement and completing the sale of the Purchased Assets:

8.1 Purchaser has been duly incorporated and is validly existing under the laws of the State of Delaware.

8.2 Purchaser has the corporate power and authority to enter into this Agreement and to perform its obligations hereunder.

8.3 This Agreement is a valid and binding obligation of the Purchaser enforceable against it in accordance with its terms.

8.4 Entering into this Agreement and completing the purchase of the Purchased Assets will not result in a violation of any of the terms or provisions of the certificate of incorporation, by-laws, or resolutions of the Purchaser or any contract, lease or indenture, written or oral, to which the Purchaser is a party or by which it is bound or any law applicable to it or require the consent of any third party.

ARTICLE 9 - COVENANTS OF THE VENDOR

9.1 The Vendor shall use its best commercially reasonable efforts to obtain prior to the Date of Closing any consent to assignment as may be necessary with respect to those

assets referred to in paragraph 4.1. The Vendor covenants and agrees that if any such consent is not obtained or if any attempted assignment would be ineffective so that the Purchaser would not in fact receive all such rights, then the Purchaser may act as agent for the Vendor thereunder in order to obtain for the Purchaser the benefits thereunder and the same shall be held in trust for the Purchaser and shall be performed by the Purchaser in the name of the Vendor and the Vendor and the Purchaser shall cooperate in that regard and all benefits and obligations derived thereunder shall be for the account of the Purchaser.

9.2 The Vendor agrees that following the Date of Closing, it shall make available to the Purchaser (and its successors in interest) at its request from time to time at reasonable times and on reasonable notice such records and documents relating to the Business (including records stored in computer media) remaining in the Vendor's possession as the Purchaser may require for any legitimate purpose, and that in the event that the Vendor intends to destroy such records, it shall notify the Purchaser so that the Purchaser may take possession of such records.

ARTICLE 10 - COVENANTS OF THE PURCHASER

10.1 The Vendor and its representatives shall have a continuing right of access to the Books and Records of the Business in the Purchaser's possession on reasonable notice for any legitimate purpose. If either of the Purchaser or the Purchaser's successors in ownership of the assets of the Business intends to destroy such records, they will first advise the Vendor, and if the Vendor so elects, it may take possession of such books and records.

10.2 The Vendor agrees that the Purchaser may for a period of up to three months following the Date of Closing continue to use the name "J.L. Clark" on its packaging materials until packaging inventories purchased hereunder have been used up; provided, that the Purchaser agrees to indemnify the Vendor from any claim, demand or expense (including reasonable legal fees) that may be incurred by the Vendor in consequence of the use by the Purchaser of the Vendor's corporate or trade names on said packaging materials.

10.3 The Purchaser shall from and after the Date of Closing assume and perform the obligations of the Vendor under those unfilled purchase orders listed in Schedule 4.1(b) and those assigned Property Leases and contracts listed in Schedule 4.1(c) in a proper and workmanlike manner, and shall keep the Vendor indemnified from any claim pursuant to any such orders and agreements except to the extent such claim relates directly to the Vendor's actions or omissions prior to the Date of Closing.

ARTICLE 11 - SURVIVAL OF REPRESENTATIONS AND WARRANTIES

11.1 The representations and warranties of each of the Vendor and the Purchaser and the indemnities related thereto contained in this Agreement shall survive the execution and delivery of this Agreement and the completion of the transactions contemplated hereby and, notwithstanding such completion nor any investigations made by or on behalf of either party hereto, shall continue in full force and effect for the benefit of the party to whom such representations or warranties were made in perpetuity in the case of Subsection 7.4 and Subsection 7.5, and until the last day of the 18th month after the Closing Date for all other matters, except that any claims made in writing prior to such date with respect to a breach of any representation and warranty (and their related indemnities) shall continue in full force and effect.

11.2 The covenants of each of the Vendor and the Purchaser contained in this Agreement shall survive the execution and delivery of this Agreement and the completion of the transactions contemplated hereby and shall continue in full force and effect and shall enure to the benefit of the parties, their successors and permitted assigns.

ARTICLE 12 - CONDITIONS OF CLOSING

12.1 The sale and purchase of the Purchased Assets is subject to the following conditions for the exclusive benefit of the Purchaser to be fulfilled or performed at or prior to the Time of Closing, unless waived in writing by the Purchaser:

(a) the Vendor shall have performed or complied with all of its covenants and agreements contained herein to be performed or complied with prior to the Closing Date in all material respects;

(b) no undisclosed action or omission prior to the date hereof or action subsequent to the date hereof, by any person, other than the Purchaser, its affiliates and associates, including a governmental or regulatory authority, or by the Vendor and its directors and senior officers which results in a material adverse change in the Business shall have occurred;

(c) no order of any court of competent jurisdiction or any regulatory authority having jurisdiction prohibiting the consummation of the purchase and sale of the Purchased Assets shall be in force and effect;

(d) the Vendor shall deliver to the Purchaser all necessary conveyances, bills of sales, assurances, transfers, assignments and such consents as the Vendor has been able to obtain in accordance with the terms of section 9.1

hereof, necessary to effectively transfer the Purchased Assets to Purchaser in accordance with the terms of this Agreement;

(e) the Vendor shall take or cause to be taken all necessary actions, steps, and corporate proceedings to approve or authorize validly and effectively the transfer of the Purchased Assets to Purchaser and the execution and delivery of this Agreement and the other agreements and documents contemplated hereby;

(f) the covenants, representations and warranties of the Vendor contained in this Agreement shall be true and correct at the Time of Closing in all material respects and the conditions set out in this Section 12.1 shall have been complied with and the Vendor shall deliver to the Purchaser at the Time of Closing its certificate to such effect; and

(g) the Vendor shall have executed and delivered to the Purchaser the Lease and the Non Competition Agreement.

12.2 The sale and purchase of the Purchased Assets is subject to the following conditions for the exclusive benefit of the Vendor to be fulfilled or performed at or prior to the Time of Closing, unless waived in writing by the Vendor:

(a) the Purchaser shall have performed or complied with all of its covenants and agreements contained herein to be performed or complied with prior to the Closing Date;

(b) no order of any court of competent jurisdiction or any regulatory authority having jurisdiction prohibiting the completion of the purchase and sale of the Purchased Assets shall be in force and effect; and

(c) the Purchaser shall take or cause to be taken all necessary actions, steps and corporate proceedings to approve or authorize validly and effectively its acquisition of the Purchased Assets, to its assumption pursuant to Section 4.1 and the execution and delivery of this Agreement and the other agreements and documents contemplated hereby; and

(d) the covenants, representations and warranties of the Purchaser contained in this Agreement shall be true and correct at the Time of Closing in all material respects and the conditions set out in this section 12.2 shall have been complied with and the Purchaser shall deliver to the Vendor at the Time of Closing its certificate to such effect.

12.3 If any of the conditions set out in sections 12.1 or 12.2 have not been satisfied or fulfilled in accordance with their terms (or waived in writing by the party entitled to waive such condition or conditions) by the Closing Date, then the party in whose favour such condition or conditions were made may terminate this Agreement by notice in writing to the other party in which event the party terminating this Agreement shall be released from all obligations hereunder without prejudice to any rights such party may have against the other party hereto. Either the Vendor or the Purchaser may terminate this Agreement by written notice to the other after November 30, 1997 if the transaction contemplated by this Agreement has not closed by such date.

ARTICLE 13 - CLOSING ARRANGEMENTS

13.1 The closing of the purchase and sale of the Purchased Assets shall take place at the Time of Closing on the Closing Date at the offices of Austin & Sidley, One First National Plaza, Chicago, Illinois, 60603 or at such other location as the parties may approve.

13.2 At the Time of Closing the Vendor shall deliver to the Purchaser actual possession of the Plant and the Purchased Assets and shall deliver to the Purchaser the following documents duly executed by all persons other than the Purchaser which delivery and performance constitute a condition precedent in favor of the Purchaser to the completion of the transactions of purchase and sale herein provided for:

(a) the Lease;

(b) the Non Competition Agreement;

(c) a certificate signed on behalf of the Vendor pursuant to Section 12.1(f); provided that the acceptance of such certificate and the closing of the transaction contemplated hereby shall not be a waiver of the representations and warranties contained herein or in any document or certificate given pursuant to this Agreement;

(d) a certified copy of the resolution duly adopted by the Board of Directors of the Vendor authorizing the execution, delivery and performance of this Agreement by the Vendor;

(e) a certificate of the Secretary or an Assistant Secretary of the Vendor as to the incumbency and signature of the officers signing this Agreement and the other documents signed by the Vendor pursuant to this Agreement;

(f) a bill of sale for the Purchased Assets in a form reasonably acceptable to counsel for the Purchaser;

(g) an assumption agreement pertaining to the agreements listed in Schedules 4.1(a), (b) (c), (d) and (e) in a form reasonably acceptable to counsel for the Purchaser; and

(h) all other documents and instruments of assignment, transfer or conveyance as the Purchaser shall reasonably deem necessary or appropriate to vest in or confirm to the Purchaser good and marketable title to the Purchased Assets as contemplated by this Agreement and all other documents and instruments reasonably required by the Purchaser to consummate the transactions contemplated hereby, including but not limited to consents and approvals of all persons to the transfer or assignment of the rights or interests under the agreements and instruments listed in Schedules 4 .1 (a), (c) and (d);

13.3 At the Time of Closing the Purchaser shall deliver to the Vendor the following documents duly executed or do the following acts and things which delivery and performance constitute a condition precedent in favor of the Vendor to the completion of the transactions of purchase and sale herein provided for:

(a) the Lease;

(b) the Non Competition Agreement;

(c) a certificate signed on behalf of the Purchaser pursuant to Section 12.2(c); provided that the acceptance of such certificate and the closing of the transaction contemplated hereby shall not be a waiver of the representations and warranties contained herein or in any document or certificate given pursuant to this Agreement;

(d) a certified copy of the resolution duly adopted by the Board of Directors of the Purchaser authorizing the execution, delivery and performance of this Agreement by the Vendor;

(e) a certificate of the Secretary or an Assistant Secretary of the Purchaser as to the incumbency and signature of the officers signing this Agreement and the other documents signed by the Purchaser pursuant to this Agreement;

(f) an assumption agreement pertaining to the agreements listed in Schedules 4 .1 (a), (b), (c), (d) and (e) in a form reasonably acceptable to counsel for the Vendor; and

(g) make payment of the Purchaser Price, in accordance with the terms of this Agreement.

ARTICLE 14 INDEMNIFICATION

14.1 The Vendor agrees to indemnify and save harmless the Purchaser, its parent and affiliated companies and their officers, directors, employees, representatives and agents (the Purchaser's "Indemnitees") of and from any loss, claim, demand, cost or expense (including legal fees, disbursements and court costs but excluding consequential damages) whatsoever suffered by the Purchaser's Indemnitees as a result of:

(a) any breach of any covenant or inaccuracy of any representation or warranty given by the Vendor to the Purchaser;

(b) any claim by the Internal Revenue Service or any state or local taxing authority for taxes that are or become due in respect of any period up to and including the Closing Date;

(c) the failure of the Vendor to satisfy, discharge fulfill or pay any Excluded Liability;

(d) any claims or liabilities incurred by the Purchaser arising out of the activities of the Vendor or the Business prior to the Closing Date including without limitation any claims relating to Environmental Laws; and

(e) any claims whatsoever for any disbursements, fees, commission or other remuneration payable or alleged to be payable to any broker, agent or other intermediary who purports to act or to have acted for the Vendor.

14.2 The Purchaser agrees to indemnify and save harmless the Vendor, its parent and affiliated companies and their officers, directors, employees, representatives and agents (the Vendor's "Indemnitees") of and from any loss, claim, demand, cost or expense (including legal fees, disbursements and court costs but excluding consequential damages) whatsoever suffered by the Vendor's Indemnitees as a result of:

(a) any breach of any covenant or inaccuracy of the representation or warranty given by the Purchaser to the Vendor;

(b) any claims whatsoever for any disbursements, fees, commission or other remuneration payable or alleged to be payable to any broker, agent or other intermediary who purports to have acted for the Purchaser; and

(c) any claims or liabilities incurred by the Vendor arising out of the activities of the Purchaser or the Business from and after the Closing Date including without limitation any claims relating to Environmental Laws and any claims, costs

liabilities or expenses related to the Employees or the actions specified to be the Purchaser's liability in Article 15.1 to the extent required by the said Section.

14.3 If a third party should bring an action or make a claim against any Indemnitee which could give rise to a right of indemnity under this Agreement, the Indemnitee shall notify the indemnifying party of the action or claim on a timely basis and the indemnifying party shall have the right to contest or dispute such action or claim and to participate in any negotiations with respect thereto. If the indemnifying party should contest or dispute such claim or action, the Indemnitee shall not settle such claim or action without the prior written consent of the indemnifying party and the Indemnitee shall co-operate in all reasonable manners with the indemnifying party. Except to the extent that the indemnifying party is prejudiced by the failure to be given timely notice by the Indemnitee, the giving of notice shall not be a condition precedent to the indemnities contained in this Agreement.

14.4 Nothing contained in this Agreement shall relieve either the Vendor or the Purchaser from their respective duties to mitigate damages.

14.5 Except as may be specifically provided in any other Article of this Agreement, the exclusive remedy available to an Indemnitee for a breach of any representation, warranty or covenant herein shall be to proceed in the manner and subject to the limitations contained in this Article 14; save and except that nothing herein shall limit a party's right to seek equitable remedies in respect of a breach of covenant.

14.6 Neither party shall be liable to the other under any indemnity given pursuant to this Agreement for breach of a representation or warranty contained in this Agreement until the aggregate amount of such party's claims for breach of representations or warranties contained in this Agreement exceeds Fifty Thousand ($50,000) Dollars (the "*de minimis* level"), whereupon the indemnifying party shall become liable for all proper indemnification claims for breach of representations or warranties of the other party from dollar one. Indemnity claims of one party shall not be set off against the indemnity claims of the other party to reduce the latter to below the *de minimis* level. The foregoing provisions shall not apply to any rights of indemnity pursuant to Subsections 14.1(b), (c), (d) and (e) and to Subsections 14.2 (b) and (c).

ARTICLE 15 - EMPLOYEES

15.1 Effective immediately at the Time of Closing, the Purchaser shall offer employment to all employees of the Business who are active and at work on the Date of Closing. Employees will not be considered "active and at work" if they are not at work due to a leave of absence, short term or long term disability, workers compensation or temporary layoff. The employees accepting the Purchaser's offer of employment are referred to in this Agreement as the "Employees". The Purchaser shall assume all liabilities (other than pension liabilities) with respect to the Employees arising out of events

occurring from the Time of Closing forward. It is understood that if severance is paid by the Vendor with respect to any employee of the Business (that is not an Employee) in the amounts set forth in the existing Collective Bargaining Agreement pertaining to such Employees (the "Union Agreement") or other written severance plan or obligation in effect at the Time of Closing and set forth in Schedule 15.1, the Purchaser will provide full indemnification for such expenses within five business days of submission to the Purchaser for a statement of such costs by the Vendor; provided, that notwithstanding anything else contained in this Agreement, the Purchaser shall not be financially responsible for severance payments to employees identified in Category A of Schedule 15.1 exceeding, in the aggregate, the sum of $15,901, nor to those identified in Category B of said schedule exceeding, in the aggregate $52,311, and the Vendor shall indemnify the Purchaser for all severance costs in respect of the named employees exceeding, by category, the said amounts. Except as aforesaid, the Purchaser will not be liable for severance costs incurred by the Vendor arising out of the sale transaction contemplated herein. Nothing in this Section shall be construed as creating any rights on behalf of any Employee or any representative or such Employees (a "Union").

15.2 The Purchaser further agrees that:

(a) it shall indemnify and hold the Vendor harmless and give written notice to the Vendor with respect to any liabilities, losses, fines, penalties, claims, demands, costs and expenses (including reasonable legal and accounting fees, disbursements and court costs but excluding consequential damages) (collectively, "Losses") suffered or incurred by the Vendor (i) with respect to any claim made by any employee of the Business other than those employees retained by the Vendor or any of its affiliates or the Union or any other party claiming through them or on their behalf based upon any change in employment status caused by the transactions provided for herein, or a violation or alleged violation of the Union Agreement, the WARN Act or any other federal, state or local law or regulation where such claim relates to or is based upon the closing of the Plant and termination of operations at the Plant by the Purchaser at any time following the Date of Closing; and (ii) in respect of all disability payments payable to Employees after the Closing Date for disabilities incurred and attributable solely to the work performed after the Closing Date; and

(b) it hereby releases and holds the Vendor harmless with respect to any Losses and consequential damages suffered or incurred by the Purchaser (i) in respect of any damages or losses to the Equipment or the Business arising out of the acts, inaction or omissions (whether intentional or negligent) of the Employees after the Closing Date; (ii) as a result of the management of the Employees by the Purchaser (including any violation or alleged violation of the Union Agreement or any applicable federal, state or local

law or regulation); (iii) in respect of any personal injury or property damage caused by any Employee (whether intentionally or negligently) after the Date of Closing, it being the intention of the Vendor and the Purchaser that all costs expenses, damages and liabilities for which the employer of the Employees would be liable, whether under contract or by operation of law (but excluding any obligation to pay or accrue pension benefits), shall be borne by the Purchaser after the Closing Date.

15.3 The Vendor further agrees that:

(a) it shall indemnify and hold harmless the Purchaser with respect to any Losses suffered or incurred by the Purchaser (i) with respect to any claim made by any Employee or the Union or any other party claiming through them or on their behalf based upon the non payment or alleged non payment of any vacation pay, pension benefit, health benefit, severance pay or other amounts due or accruing to any employee of the Business or any right accruing or due to the Union on or before the Date of Closing except as expressly provided in Sections 15.1 and 15.2;

(b) it shall not agree to any settlement of any issue or grievance with any employee of the Business or the Union or any other party on their behalf with respect to any matter that is the Purchaser's financial responsibility pursuant to this Agreement without prior consultation with and approval by the Purchaser; provided, that should the Purchaser refuse its approval to any such settlement, it shall indemnify the Vendor for any Losses suffered by the Vendor as a result of such refusal of approval.

ARTICLE 16 - DATA PROCESSING SERVICES

For a period of up to one year following the Date of Closing, but in any event no longer than the term of the Purchaser's occupancy of the Plant pursuant to the Lease (the "Data Term"), the Vendor will maintain and make available to the Purchaser for purposes of the conduct of the Purchaser's business at the Plant the data processing services that were provided to the Business by the Vendor prior to the Date of Closing (the "Data Processing Services"). The Data Processing Services shall include receipt of data input from the Purchaser, the processing of the said data, the delivery of reports that are the product of such processing, both in hard copy and electronic form, all subject to the following terms:

(a) The Purchaser shall reimburse the Vendor on invoice for any direct costs incurred by the Vendor in providing Data Processing Services and equitably allocable to the provision of such services;

(b) The Vendor does not warrant the accuracy or the uninterrupted, trouble-free operation of the Data Processing Services, and the Vendor shall not be obliged to provide to the Purchaser any such service that the Vendor is not in good faith able to deliver;

(c) In the event that the Purchaser ceases to require the Data Processing Services prior to the expiry of the Data Term, it shall so advise the Vendor in writing at least two weeks prior to the date upon which such services cease to be required.

ARTICLE 17 - NOTICE

Any notice or other communication required or permitted to be given hereunder shall be sufficiently given if delivered on a Business Day personally or by courier or on the business day following transmission by fax, where such transmission is confirmed with a copy sent by first class mail on the next business day following successful transmission to the Vendor or the Purchaser at the appropriate address set out below or such other address as the Vendor or the Purchaser, as the case may be, may designate to the other in writing. The address for each of the parties hereto shall be:

(a) as to the Vendor:

J.L. Clark, Inc.
2323 Sixth Street, P.O. Box 7007
Rockford, Illinois 61125
USA
fax: (815) 962-8371
Attention: The President

with a copy to:

Sidley & Austin
One First National Plaza
Chicago, Illinois 60603
USA
fax: (312) 853-7036
Attention: David J. Boyd, Esq.

(b) as to the Purchaser:

CCL Tube Corporation
c/o Advanced Monobloc
96 Scarsdale Road
Don Mills, Ontario
Canada M3B 2R7
fax:(416) 391-5558

Attention: Group Vice President Finance & Administration

with a copy to:

CCL Industries Inc.
105 Gordon Baker Road
Suite 800
Willowdale, Ontario
Canada, M2H 3P8
fax: (416) 756-8555
Attention: General Counsel

ARTICLE 18 - ANNOUNCEMENTS

No party to this Agreement shall make any press release or public announcement after the date hereof concerning the purchase and sale of the Purchased Assets, except as may be required by applicable securities legislation or the rules and policies of the stock exchanges on which the shares of CCL Industries Inc. or CLARCOR Inc. are listed and posted for trading, without the prior written approval of the other party, such approval not to be unreasonably withheld or delayed. If CCL Industries Inc. or CLARCOR Inc. is required by applicable securities legislation or the policies of relevant stock exchanges to issue a press release or make a public announcement, the party making such announcement shall give the other such opportunity to comment on such press release or public announcement as is reasonable in the circumstances. Any announcement or notification after the date hereof to customers, suppliers or employees of the Business shall be jointly approved by the Vendor and the Purchaser, such approval not to be unreasonably withheld.

ARTICLE 19- BENEFIT OF AGREEMENT

This Agreement shall be binding upon and enure to the benefit of the parties hereto and their respective successors by amalgamation, merger or liquidation and permitted assigns. The Purchaser holds the benefit of the indemnities set forth in Section

14.1 in trust and as agent for its parent and affiliated companies and their officers, directors, employees, representatives and agents.

ARTICLE 20 - DISPUTE RESOLUTION AND GOVERNING LAW

20.1 (a) In the event that any dispute should arise between the parties related to the interpretation of this Agreement or the rights or the performance of either party hereunder, the parties agree that they will attempt to resolve the dispute through direct discussion and negotiation between high level officers of the parties, duly authorized to compromise and settle any such dispute.

(b) In the event that the procedure set forth in the foregoing Subsection has not achieved resolution of any such dispute within thirty (30) days of written notification of such dispute by either party to the other, either party may by written notice require the appointment of a mediator to assist in the resolution of such dispute in accordance with the following terms:

(i) The mediator shall be selected by agreement from a list of candidates proposed by the parties;

(ii) The mediator shall within seven days of his appointment request from each party its written detailed position on the matter in dispute;

(iii) Within seven days of his receipt of the written statements of the parties, the mediator shall convene a meeting with the parties at a location in Chicago, Illinois to be selected by the mediator, to which each party shall send representatives fully authorized to compromise and settle the dispute.

(iv) The costs of the mediation shall be born equally by the parties regardless of the outcome of the dispute;

(v) In the event that the mediation is unsuccessful, or in the event that either party refuses to co-operate in the mediation process, the other party shall be entitled to refer the dispute to the courts.

20.2 This Agreement shall be construed and interpreted in accordance with the laws of the State of Illinois and in all matters shall be treated as a contract performed in its entirety in the State of Illinois. Subject to the foregoing Section, the parties hereby attorn to the exclusive jurisdiction of the courts of the State of Illinois, sitting without jury, for the adjudication of any matter arising under this Agreement.

ARTICLE 21 - ENTIRE AGREEMENT

This Agreement and the Schedules hereto together with any undertakings of the parties delivered in connection with or in furtherance of this Agreement embodies the entire agreement and understanding between the Vendor and the Purchaser with respect to the purchase and sale of the Purchased Assets and supersedes all prior agreements and understanding whether oral or written relative to the subject matter hereof. Except as set out herein, there are no representations, warranties, conditions or collateral agreements, express or implied, statutory or otherwise, between the Vendor and the Purchaser with respect to the Purchased Assets. No supplement, modification or amendment of this Agreement shall be binding unless it specifically refers to this Agreement and is executed and delivered by the party to be bound thereby.

ARTICLE 22 - WAIVER

No waiver of any provision of this Agreement shall (a) be binding unless made in writing specifically referring to this Agreement and executed and delivered by the party to be bound hereby, (b) be a waiver of any other provision hereof (whether or not similar), or (c) constitute a continuing waiver unless expressly stated to be such.

ARTICLE 23 - FURTHER ASSURANCES

The parties agree to execute and deliver such documents, instruments and other assurances as may be reasonably necessary to carry out the intent of this Agreement.

ARTICLE 24 - COUNTERPARTS

This Agreement may be executed by the parties hereto in separate counterparts each of which when so executed and delivered shall be an original, but all such counterparts shall together constitute one and the same instrument.

ARTICLE 25 - EXPENSES

All costs and expenses (including, without limitation, the fees and disbursements of legal counsel, accountants and other professional advisors) incurred in connection with this agreement and the purchase and sale of the Purchased Assets shall be paid by the party incurring such expenses.

DATED as of the date of first above written.

J.L. CLARK, INC.

per: _____

CCL TUBE CORPORATION

per: _____

Appendix K

SPECIAL WARRANTY DEED
(ILLINOIS)

THIS INDENTURE, made this 27th day of August, 1998, between J.L. Clark, Inc., a Delaware corporation, c/o Clarcor Inc., 2300 6th Street, P.O. Box 7000, Rockford, IL, 61125, Grantor, and MXL Industries, Inc., 1764 Roherstown Road, Lancaster, PA, 17601, Grantee,

WITNESSETH

That grantor, in consideration of the sum of One Million Seven Hundred Twenty-Five Thousand Dollars ($1,725,000.00), receipt whereof is hereby acknowledged, does hereby convey and quitclaim unto the grantee, in fee simple, the following described real estate, situated in the County of DuPage and State of Illinois, to wit:

See Exhibit A

Permanent Real Estate Index Number(s): 08-12-407-006

Address(es) of real estate: 2300 Wisconsin Avenue, Downers Grove, Illinois

together with the tenements, hereditaments and appurtenances thereunto belonging or in any wise appertaining.

TO HAVE AND TO HOLD the same unto said Grantee, and to the proper use, benefit and behoof, forever, of said Grantee.

The Grantor, for itself, and its successors, does covenant, promise and agree, to and with the Grantee, its heirs, successors and assigns, that it has not

The Grantor, for itself, and its successors, does covenant, promise and agree, to and with the Grantee, its heirs, successors and assigns, that it has not done or suffered to be done, anything whereby the said premises hereby granted are, or may be, in any manner incumbered or charged, except as herein recited; and that it WILL WARRANT AND FOREVER DEFEND the said premises, against all persons lawfully claiming rights inconsistent with the foregoing covenant by, through or under it.

This deed is made subject to: (a) covenants, conditions and restrictions of record; (b) private, public and utility easements and roads and highways, if any; (c) party wall rights and agreements, if any; (d) existing leases and tenancies; (e) special taxes or assessments for improvements not yet completed; (f) installments not due at the date hereof of any special tax or assessment for improvements heretofore completed; (g) mortgage or trust deed specified below, if any; (h) general taxes for the year 1997 and subsequent years including taxes which may accrue by reason of new or additional improvements during the year 1998.

IN WITNESS WHEREOF, the grantor hereunto sets its hand and seal the day and year first above written.

J.L. Clark, Inc., a
Delaware corporation

By: John P. Paladino
Print Name: JOHN P. PALADINO
Its: VICE PRESIDENT-CONTROLLER

STATE OF ILLINOIS)
)ss
COUNTY OF DUPAGE)

I, the undersigned, a Notary Public in and for said County, in the State aforesaid, DO HEREBY CERTIFY that John Palanno personally known to me to be the same persons whose name is subscribed to the foregoing instrument and personally known to me to be a member of J.L. Clark, Inc., a Delaware corporation, appeared before me this day in person, and acknowledged that he signed, sealed and delivered the said instrument as his free and voluntary act and the free and voluntary act of J.L. Clark, Inc., for the uses and purposes therein set forth.

Given under my hand and official seal, this 27th day of August , 1998.

Commission expires:

M. S. Blaylock
Notary Public

OFFICIAL SEAL
M S BLAYLOCK
NOTARY PUBLIC STATE OF ILLINOIS
MY COMMISSION EXP. JUNE 23,1999

This instrument was prepared by:

Betsy J. Mukamal
Sidley & Austin
One First National Plaza
Chicago, IL 60603

After recording mail to:

Betsy J. Mukamal
Sidley & Austin
One First National Plaza
Chicago, Illinois 60603

Send subsequent tax bills to:

MXL Industries, Inc.
Steven K. Cliff,
President
1764 Rohrerstown Road
Lancaster, PA 17601

EXHIBIT A

Legal Description of the property at 2300 Wisconsin Avenue:

Lot 1 in Frank Lopata resubdivision of lots 10, 11 and 12 in the resubdivision of lots 8 to 13 inclusive in Ellsworth Park unit 3, and lot 24 in Ellsworth Park unit 5 in the east 1/2 of the southwest 1/4 of section 12 and the north 1/2 of the south east 1/4 of section 12, township 38 north, range 10, east of the third principal meridian, according to the plat of said Frank Lopata resubdivision recorded August 13, 1965 as document R65-30445, in DuPage County, Illinois.

Illinois Department of Revenue

For use by County Recorder's Office

County

Date

Doc. No.

Vol.

Page

Rec'd. By:

Local Government Services Bureau
REAL ESTATE TRANSFER DECLARATION

THE FOLLOWING INFORMATION IS REQUIRED BY THE REAL ESTATE TRANSFER TAX LAW (35 ILCS 200/31-25). PAGES 1 THROUGH 3 ARE TO BE FILLED OUT BY THE SELLERS* AND BUYERS* OR THEIR AGENTS. ANY WILLFUL FALSIFICATION OR WILLFUL OMISSION OF INFORMATION IS A CLASS B MISDEMEANOR (35 ILCS 200/31-50).

EXCEPT AS TO EXEMPT TRANSACTIONS, THE COUNTY RECORDER IS PROHIBITED BY LAW FROM ACCEPTING ANY DEED OR TRANSFER OF BENEFICIAL INTEREST OF A LAND TRUST (TRUST DOCUMENT) FOR RECORDATION UNLESS IT IS ACCOMPANIED BY THIS DECLARATION CONTAINING ALL OF THE INFORMATION REQUESTED HEREIN (35 ILCS 200/31-25).

PROPERTY IDENTIFICATION

Address of Property 2300 Wisconsin Avenue (Street) Downers Grove (City or Village) _____ (Township)

Permanent Real Estate Index No. 08-12-407-006

Date of Deed (or Trust Document) 8/27/98 (Month/Year)

Enter Legal Description on Page 2 of this form.

NOTICE: The State of Illinois has enacted a Smoke Detector Act.

Type of Deed (or Trust Document) Special Warranty Deed

PROPERTY CHARACTERISTICS

Lot Size _____

Acreage _____

Check type of improvement on property

- ☐ Vacant land/lot
- ☐ Residence (Single family or duplex)
- ☐ Mobile home (see note on page 2)
- ☐ Apartment bldg. (6 units or less)
- ☐ Commercial apartment (Over 6 units)
- ☒ Store, office, commercial bldg.
- ☐ Industrial bldg.
- ☐ Farm, land only
- ☐ Farm, with bldgs.
- ☐ Other (Specify) _____

SALE INFORMATION (The following questions must be answered.)

NOTE: You do not have to complete the Finance Questions at the bottom of this page or the Finance Schedule at the top of pages 2 and 3 of this form, if you answer any of the following questions "Yes".

	Yes	No
1. Is this a transfer between relatives or related parties?	☐	☒
2. Is this a compulsory transaction in lieu of foreclosure, divorce, court order, condemnation, probate, etc.?	☐	☒
3. Was this a transfer in settlement of an installment contract for deed initiated prior to the year of recording?	☐	☒
If "Yes", enter contract year _____		
SPECIAL NOTE: If contract year is the same as year of recording, answer this question "No".		
4. Was the deed any of the following types:	☐	☒

• Sheriff's Deed • Judge's Deed • Quit Claim Deed • Conveyance of Less than full interest
• Trust Document which Refers to COLLATERAL ASSIGNMENT of Beneficial Interest of Trust

TERMS OF SALE

Full Actual Consideration (Sale Price)	$ 1,725,000.00
Less amount of personal property included in purchase (Do not deduct value of beneficial interest of a land trust.)	$ -0-
Net consideration for real property	$ 1,725,000.00
Less value of other real property transferred to seller as part of full consideration	$ -0-
Less outstanding amount of mortgage to which the transferred real property remains subject	$ -0-
Net taxable consideration subject to transfer tax	$ 1,725,000.00

CALCULATION OF TRANSFER TAX

Amount of State of Illinois tax stamps ($.50 per $500 or part thereof of taxable consideration)	$ 1,725,00[illegible]
Amount of county tax stamps ($.25 per $500 or part thereof of taxable consideration)	$ 862.50
Total Transfer Tax Collected	$ 2,587.50

Use this space to describe any special circumstances involving this transaction:

FINANCE QUESTIONS: If the answer is "No" to all of the above Sale Information questions, ALL of the following questions must be answered. If any of the questions below are answered "Yes" the buyer* or buyer's* representative MUST complete the Finance Schedule on the top of pages 2 and 3.

If FINANCE QUESTIONS 1 through 5 are answered "No", DO NOT complete Finance Schedule on Pages 2 and 3.

	Yes	No
1. Does property REMAIN SUBJECT to a mortgage such as an assumed mortgage?	☐	☐
2. Did the seller* provide a mortgage in partial or full consideration?	☐	☐
3. Did the seller* pay points to secure the buyer's* mortgage, including VA and FHA insured loans?	☐	☐
4. Did the seller's* mortgagee make interest concessions to the buyer*, i.e., offer a "blended" interest rate below market but greater than the seller's existing mortgage rate?	☐	☐
5. Was the financing in any other manner unique or specifically associated with the property being transferred, e.g., builder "buy down" of interest, etc.?	☐	☐

* If this transaction is a transfer of a beneficial interest of a land trust, substitute the word Assignor for Seller and Assignee for Buyer.

Finance Schedule Instructions:

The Real Estate Transfer Tax Law (35 ILCS 200/31-25) requires information regarding the financing of the purchase price of this property.

Lines A and C through I of the Finance Schedule must be filled out by the buyer* or buyer's* representative to account for financing of the purchase. Columns I through VI must be completed for each loan involved.

Information required in each column:

I Principal of loan; for an assumed mortgage show principal being assumed.

II Length of time on which monthly payments were calculated. If not applicable mark with an asterisk and explain repayment schedule in Box J on Page 3. For an assumed mortgage show years remaining from time of sale until loan is fully amortized (paid).

III If applicable, length of time until mortgage loan must be paid off or renegotiated, or time until balloon payment is due.

IV Nominal interest rate as stated in loan document. If Prime Rate is used, state rate used at time of transfer.

V Indicate if this loan has a FIXED interest rate by entering F in the column, adjustable rate by entering A, or renegotiable by entering R in the column.

VI Show the number of points and dollars paid. Enter points paid by the seller* only.

Box J may be used to show more information regarding financing if necessary.

SPECIAL NOTE: If your financing involves other than equal monthly payments you must explain in Box J on Page 3.

TYPE OF FINANCING: Enter cash downpayment on line A.

Account for financing the remainder of the purchase price on line through I. (If lines A through I do not add up to full consideration sh on Page 1 of declaration, explain in Box J.)

A. Enter Cash Downpayment (include earnest money) - $

B. Enter remainder of Purchase Price on Lines C through I:

C. Purchase Money Mortgage to Seller*

D. New 1st Mtg. [specify type**

E. New 2nd Mtg. [specify type**

F. New 3rd Mtg. [specify type**

G. Assumption of existing 1st Mtg.

H. Assumption of existing 2nd Mtg.

I. Other Financing [specify type**

** *Specify type: e.g., Blend, Conventional, Seller* Financed VA/FHA insured, etc.*

PARTIAL INTEREST *(Complete if applicable.)*

If less than a full interest in the real estate is being transferred, state the part being transferred: _____

LEGAL DESCRIPTION

Section 12 Township 38 North Range 10

Enter complete legal description in this area:

SEE EXHIBIT A

NOTE: If mobile home is included in the sale price, is the value of the mobile home being deducted as personal property on page 1? Yes ☐ No ☐

BENEFICIAL INTEREST OF LAND TRUST *(Complete if applicable.)*

If this transaction is the transfer of a beneficial interest of a land trust, check this box: ☐

EXHIBIT A

Legal Description of the property at 2300 Wisconsin Avenue:

Lot 1 in Frank Lopata resubdivision of lots 10, 11 and 12 in the resubdivision of lots 8 to 13 inclusive in Ellsworth Park unit 3, and lot 24 in Ellsworth Park unit 5 in the east 1/2 of the southwest 1/4 of section 12 and the north 1/2 of the south east 1/4 of section 12, township 38 north, range 10, east of the third principal meridian, according to the plat of said Frank Lopata resubdivision recorded August 13, 1965 as document R65-30445, in DuPage County, Illinois.

FINANCE SCHEDULE — DO NOT complete this schedule if FINANCE QUESTIONS 1 through 5 on Page 1 are all answered "No".

	I	TERM		IV	V	VI		
	Amount of Principal ($'s)	II Amortization Period (Years Remaining)	III Term To Balloon or Renegotiation (Years)	Interest Rate (%)	Type of Interest Rate	Points Paid by SELLER* To Obtain Financing DO NOT SHOW POINTS PAID BY BUYER*		
						%	$'s	
A.	XXXXXXXXX	XXXXXXXX	XXXXXXXX	XXXXXXX	XXXXX	XXXXXX	XXXXXXXXX	
B.	XXXXXXXXX	XXXXXXXX	XXXXXXXX	XXXXXXX	XXXXX	XXXXXX	XXXXXXXXX	
C.						XXXXXX	XXXXXXXXX	
D.								
E.								
F.								
G.								
H.								
I.								

OFFICIAL USE ONLY

J. Use this space to explain replies in Finance Schedule if necessary and to explain any characteristics of the financing of this transaction that may have impacted the sale price.

BUYER*:

I hereby declare the Finance Schedule on Pages 2 and 3 of this declaration to be true and correct. *(NOTE: Any person who willfully falsifies or omits any information required in this declaration shall be guilty of a Class B Misdemeanor.)*

Buyer or Name of person filling out the Finance Schedule for the buyer: _____ Please Print _____ Signature

Address _____ Telephone ( ) –

(If you prefer the Department contact the lending institution if further financing information is required, also provide the institution's name, address, and telephone number below.)

Name of Lending Institution _____ Address _____ ( ) – Telephone

BUYER* & SELLER*:

The buyer* and seller* hereby declare the full actual consideration and above facts contained in this declaration (excluding the Finance Schedule) to be true and correct. If this transaction involves any real estate located in Cook County, the seller* or his agent hereby certifies that to the best of his knowledge, and the buyer* or his agent hereby certifies that, the name of the buyer* shown on the deed or assignment of beneficial interest in a land trust is either a natural person, an Illinois corporation or foreign corporation authorized to do business or acquire and hold title to real estate in Illinois, a partnership authorized to do business or acquire and hold title to real estate in Illinois, or other entity recognized as a person and authorized to do business or acquire and hold title to real estate under the laws of the State of Illinois. *(NOTE: Any person who willfully falsifies or omits any information required in this declaration shall be guilty of a Class B Misdemeanor. Any person who knowingly submits a false statement concerning the identity of a grantee shall be guilty of a Class C Misdemeanor for the first offense and of a Class A Misdemeanor for subsequent offenses.)*

J.L. Clark Inc.

Name and Current Residence of Seller* (Please Print)

Name and Address of Trustee if this is a transfer of beneficial interest of a land trust. Trust Number

Signature: _____ Seller or Agent

MXL Industries, Inc.

Name and Current Residence of Buyer* (Please Print)

Signature: _____ Buyer* or Agent

Mail tax bill to: MXL Industries, Inc. Steven K. Cliff 1764 Rohrerstown Rd. Lancaster, PA 17601

Name Street City

PREPARER:

Section 31-25 of the Property Tax Code (35 ILCS 200/31-25) requires the following information to be completed:

Name of person filling out the real estate transfer declaration for the buyer* and seller*: Betsy J. Mukamal, Sidley & Austin

Please Print

Address One First National Plaza, Chicago, IL 60603 Telephone (312) 853-7634

THIS BOX FOR USE BY DEPARTMENT OF REVENUE ONLY:

Initial _____ Date _____

* If this transfer is an assignment of a beneficial interest of a land trust, substitute the word Assignor for Seller and Assignee for Buyer.

ASSESSMENT INFORMATION ON SOLD PROPERTIES

This page is to be completed by the County Assessor or Supervisor of Assessments. The form is to be mailed to Illinois Department of Revenue, 101 West Jefferson, P.O. Box 19033, Springfield, IL 62794-9033 after being processed by county personnel.

1. ENTER BRIEF LEGAL DESCRIPTION OF PROPERTY AS IT APPEARS ON ASSESSMENT BOOKS.

SEE EXHIBIT A

2. INSTRUCTIONS FOR COMPLETING PROPERTY DESCRIPTION CODES:

(a) Enter Permanent Real Estate Index Number. Enter the property use code in the Unit No. boxes if using the IL Real Property Appraisal Manual, or circle the appropriate letter if using the codes in the IL Property Tax Manual. Enter the assessment Quadrant if applicable.

(b) County & Township: Use codes from Department Code Sheets.

(c) Class of Property: For Cook County, see Property Type Code Sheet.

(d) Date of Deed: Enter month and year from Page 1 of declaration.

(e) Acreage: For Class 51 and 61 Property, enter number of acres; for Class 71 and 81 Property, leave blank.

For Downstate Counties: enter

51 (if assessed as farm (10-125) with no building)

61 (if assessed as farm (10-125 and 10-340) with a building)

71 (assessed as nonfarm with no building)

81 (assessed as nonfarm with a building)

PERMANENT REAL ESTATE INDEX NO.

(a) 0 8 (TWP.) 1 2 (SEC.) 4 0 7 (BLOCK) 0 0 6 (PARCEL) (UNIT) / F, FO, FI, C, I, R Circle One (ASSM'T. QUAD.)

(b) County

Township

(c) Class

(d) Date of Deed — Month Year

(e) Acreage (Round to nearest full acre)

Comments by Supervisor of Assessments or County Assessor:

3. ASSESSED VALUE DATA

Enter assessed value as finally adjusted by the Board of Review or Appeals for the year prior to the date of sale. Where assessment is partial or split, designate with a large "P" or "S" on the assessment boxes.

YEAR PRIOR TO SALE

Book No	Page	Line

Land	
Bldgs.	
Total	

The following questions must be answered:

	Yes	No	
1.	☐	☐	Is this a 10-125, formerly 20a, assessment? ("Farm Bill")
2.	☐	☐	Is this a partial assessment? (i.e., improvement not completed on assessment date)
3.	☐	☐	Will a split (division) be required to reflect the legal description on this deed (or Trust Document)?
4.	☐	☐	Has an improvement been added or removed since January 1 of the year prior to the sale, but before the sale date?
5.	☐	☐	Does assessment shown reflect all Board of Review or Appeals action for the year indicated (including Board of Review equalization factors)?
6.	☐	☐	Is this a 10-30, formerly 20g-4, assessment?
7.	☐	☐	If sale involves a mobile home, is the mobile home assessed as real estate?

I hereby certify that the information shown relates to the property described in the declaration and that the assessed valuations are for the property included in the transfer.

Dated this 27th day of August, 19 98

Supervisor of Assessments or County Assessor

FOR DEPARTMENT USE ONLY

Multiple Parcel Indicator

Full Consideration

Adjusted Consideration

Tab Number:

File Maintenance

This form is authorized in accordance with 35 ILCS 200/1-1 et seq. Disclosure of this information is REQUIRED. This form has been approved by the Forms Management Center. IL-492-0227

SOY BASE INK RECYCLED PAPER PTAX-203 (R-4/94

Appendix L

Appendix M

State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director
2200 Churchill Road, Springfield, IL 62794-9276

APPLICATION FOR OPERATING PERMIT RENEWAL

NOVEMBER 1, 1996 217/782-2113

J.L. CLARK MANUFACTURING CO.
ATTN: JAMES K. KLOTZ CHEIF CHEMIST
2300 6TH STREET
ROCKFORD IL 61101

APPLICATION NO: 73030535

ID NUMBER: 043030AAR
OPERATION OF: ALUMINUM TUBE LINES
LOCATION: J.L. CLARK MFG. CO. - ATLAS TUBE DIV.
2300 WISCONSIN AVENUE
DOWNERS GROVE IL 60515

THE ABOVE REFERENCED OPERATING PERMIT WILL EXPIRE ON APRIL 01, 1997. THE AGENCY RECOMMENDS THAT YOU APPLY FOR A RENEWAL OF THIS OPERATING PERMIT AT LEAST NINETY (90) DAYS PRIOR TO ITS EXPIRATION.

IF YOUR OPERATION IS UNCHANGED, YOU MAY REQUEST TO RENEW YOUR PERMIT BY SIGNING IN THE SPACE PROVIDED, KEEPING ONE COPY FOR YOUR RECORDS, AND RETURNING THIS CORRESPONDENCE TO THE AGENCY. IF DATED AND SIGNED BY THE AGENCY THIS APPLICATION WILL BE YOUR PERMIT AND WILL BE RETURNED TO YOU.

IF YOUR OPERATION:
1) HAS BEEN MODIFIED; OR
2) HAS CHANGED FROM THE DESCRIPTION FILED WITH THE AGENCY; OR
3) INCLUDES EMISSION SOURCES OR CONTROL EQUIPMENT DIFFERENT FROM THAT WHICH IS GIVEN BELOW;

THEN TO RENEW YOUR OPERATING PERMIT YOU MUST COMPLETE THE APPROPRIATE FORMS (SEE ENCLOSED "REQUEST FOR PERMIT FORMS" APC209) AND APPLY FOR A RENEWAL WITH AN APC 200 FORM.

IF THE OPERATION HAS BEEN PERMANENTLY DISCONTINUED, PLEASE ATTACH A LETTER TO THE AGENCY WITHDRAWING THIS PERMIT. IF THERE HAS BEEN A CHANGE OF ADDRESS, PLEASE INDICATE THIS BY CORRECTING THE ABOVE INFORMATION. IF THERE HAS BEEN A CHANGE OF OWNERSHIP, PROPER DOCUMENTATION MUST BE SUBMITTED TO ALLOW TRANSFER OF PERMITS. IF THE OPERATION HAS BEEN INCLUDED IN ANOTHER PERMIT, PLEASE PROVIDE THE PERMIT NUMBER OF THE NEW PERMIT(S) AND A LETTER OF EXPLANATION.

I CERTIFY THAT THE ORIGINAL APPLICATION INFORMATION REMAINS TRUE, CORRECT, AND CURRENT AND THAT I AM AUTHORIZED TO EXECUTE THIS APPLICATION FOR PERMIT RENEWAL.

Gregory C. Gann 12/17/96
SIGNATURE DATE

GREGORY C. GANN VICE PRESIDENT OF OPERATIONS
PRINTED NAME AND TITLE OF SIGNER

Printed on Recycled Paper

State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director
2200 Churchill Road, Springfield, IL 62794-9276

ID NUMBER: 043030AAR
APPLICATION NO.: 73030535

----------FOR AGENCY USE ONLY----------

PERMIT EXPIRATION DATE:

PERMIT IS GRANTED TO OPERATE THE FOLLOWING REFERENCED EQUIPMENT SUBJECT TO STANDARD CONDITIONS ATTACHED HERETO AND ANY SPECIAL CONDITIONS OF THE PREVIOUSLY GRANTED OPERATING PERMIT.

DONALD E. SUTTON, P.E.
MANAGER, PERMIT SECTION
DIVISION OF AIR POLLUTION CONTROL

CC: REGION 126

****

SOURCES AND CONTROLS COVERED BY THIS PERMIT:

EQUIP. TYPE	INVENTORY NUMBER	NO. IDENT SRCES	NAME
SOURCE	0001	09	ANNEALING OVENS (ALUMINUM LINES)-4 ELEC+5 GAS
SOURCE	0002	14	14 ROLLER COATERS - 9 ALUMINUM & 5 LEAD LINES
SOURCE	0003	09	CURING OVENS ON COATERS (ALUMINUM LINES)
SOURCE	0004	09	PRINTERS (ALUMINUM LINES)
SOURCE	0005	09	CURING OVENS FOR PRINTERS (ALUMINUM LINES)
SOURCE	0006	01	2 INTERNAL TUBE LINING MACHINES (ALUMINUM LINES)
SOURCE	0007	01	2 CURING OVENS FOR INTERNAL COATERS (ALUMINUM)
SOURCE	0010	05	PRINTERS-ONLY 2 USED- LEAD LINES
SOURCE	0011	01	ANNEALING OVEN-HINTERKOPF LINE-NEG.EMSNS
SOURCE	0012	01	ROLLER COATER & PRINTER-HINTERKOPF LINE
CONTROL	0001		CAPTURE HOODS & FUME INCINERATOR
CONTROL	0002		CAPTURE HOODS & FUME INCINERATOR

****

State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director
217/782-2113

2200 Churchill Road, Springfield, IL 62794-9276

OPERATING PERMIT

PERMITTEE

J.L. Clark
Attn: James K. Klotz
2300 Sixth Street
P.O. Box 7000
Rockford, IL 61125

Application No.: 73030535
I.D. No.: 043030AAR
Applicant's Designation: 3503A
Date Received: February 22, 1995
Subject: Aluminum Tube Lines
Date Issued: March 28, 1995
Expiration Date: April 1, 1997
Location: 2300 Wisconsin Avenue, Downers Grove

Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of a Hinterkopf line consisting of an extrusion press, an annealing oven, a roller coater & printer and a curing oven, 9 existing annealing ovens (8 electric & 1 gas), 9 existing roller coaters for aluminum lines, 9 existing printers, 9 curing ovens for printers, and coaters (4 electric and 5 gas) 3 internal tube lining machines, 3 curing ovens for internal coaters, 3 existing roller coaters for lead lines, and a fume incinerator as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1. The fume incinerator and capture system are required to have an overall efficiency sufficient to limit VOM emissions from the coating operation to no more than what is allowed under Section 218.204 pursuant to Section 218.207(b)(2).

2. The Permittee shall maintain the fume incinerator combustion chamber temperature at the manufacturer's recommended level but not lower than 1400°F.

3. The incinerator shall be equipped with a temperature indicator for afterburner combustion chamber temperature.

4. Emissions of nitrogen oxides from the annealing oven and the curing oven of the Hinterkopf line shall not exceed 0.3 ton per year. This limit is based on maximum heat input rate, 6000 hours of operation per year and the standard emission factors for natural gas combustion.

5. The Permittee shall maintain the following records for the coating operation for 3 years.

   a. Usage of each coating and all other VOM containing materials.
   b. The VOM content of each coating in pounds of VOM/gallon of coating solids as applied.

c. VOMa and E pursuant to Section 218.105(e)(2).
d. A log of operating time for the capture system, control device, and the associated coating line.

6. Upon renewal of this permit, data and information shall be provided that shows compliance with Section 218.207(b)(2). This information should show the VOM contents of each coating in terms of pounds VOM per gallon of coating solids as applied. Thinners should not be listed separately because the VOM contents and usage of the coatings should be determined after the thinners have been added to the coatings as specified in the IEPA regulations.

7. Pursuant to 35 Ill. Adm. Code 218.107, if odor nuisance or threat to human health does not exist, the Permittee need not operate the incinerator during any time between November 1 of any year to April 1 of the following year during which an ozone advisory, alert or emergency has not been declared pursuant to 35 Ill. Adm. Code 244. If odor nuisance exists or there is a threat to public health, operation of the incinerator is required to control emissions of the coating operations.

If you have any questions on this, please call David Hulskotter at 217/782-2113.

Donald E. Sutton/mar

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:DWH:jmm/sp0275L/2-3

cc: Region 1
Mary Meyer

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62706

STANDARD CONDITIONS FOR OPERATING PERMITS

July 1, 1985

The Illinois Environmental Protection Act (Illinois Revised Statutes, Chapter 111-1/2, Section 1039) grants the Environmental Protection Agency authority to impose conditions on permits which it issues.

The following conditions are applicable unless superseded by special permit condition(s).

1. The issuance of this permit does not release the permittee from compliance with state and federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or with applicable local laws, ordinances and regulations.

2. The Agency has issued this permit based upon the information submitted by the permittee in the permit application. Any misinformation, false statement or mispresentation in the application shall be grounds for revocation under 35 Ill. Adm. Code 201.207.

3. a. The permittee shall not authorize, cause, direct or allow any modification, as defined in 35 Ill. Adm. Code 201.102, of equipment, operations or practices which are reflected in the permit application as submitted unless a new application or request for revision of the existing permit is filed with the Agency and unless a new permit or revision of the existing permit(s) is issued for such modification.

   b. This permit only covers emission sources and control equipment while physically present at the indicated plant location(s). Unless the permit specifically provides for equipment relocation, this permit is void for an item of equipment on the day it is removed from the permitted location(s) or if all equipment is removed, notwithstanding the expiration date specified on the permit.

4. The permittee shall allow any duly authorized agent of the Agency, upon the presentation of credentials, at reasonable times:

   a. to enter the permittee's property where actual or potential effluent, emission or noise sources are located or where any activity is to be conducted pursuant to this permit,

   b. to have access to and to copy any records required to be kept under the terms and conditions of this permit,

   c. to inspect, including during any hours of operation of equipment constructed or operated under this permit, such equipment and any equipment required to be kept, used, operated, calibrated and maintained under this permit,

   d. to obtain and remove samples of any discharge or emission of pollutants, and

   e. to enter and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring or recording any activity, discharge or emission authorized by this permit.

5. The issuance of this permit:

   a. shall not be considered as in any manner affecting the title of the premises upon which the permitted facilities are located,

   b. does not release the permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the facilities,

J. L. Clark

Date: May 13, 1995

To: John Benton

By: [redacted]

Copies to: Gordon VerWeyst

Reference: J. L. Clark-Tube Division

Subject: Air Permit

Attached for your files is a copy of the revised air permit which we received last month. There are no significant changes, short of the requirements in #6. We will be addressing this issue when we complete the application for the new Sprimag machine.

Please note the record keeping requirements in #5a and #5d and #7 which should be maintained at the facility. If you have any questions, please let us know.

J.L.CLARK
a member of the CLARCOR consumer products group

February 21, 1995

Mr. David Hulskotter
Division of Air Pollution Control
Permit Section
Illinois Environmental Protection Agency
P. O. Box 19276
Springfield, IL 62794-9276

Z 409 372 825

Dear Mr. Hulskotter:

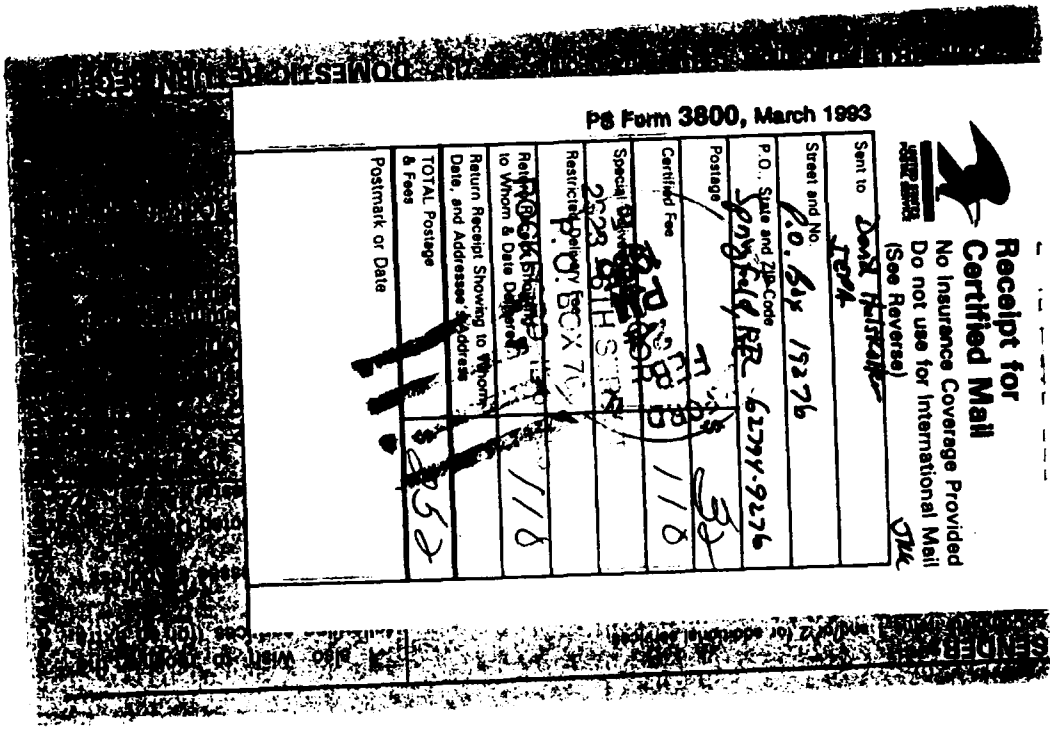
Enclosed please find documentation on coating materials and calculations utilized at J. L. Clark-Tube Division, 2300 Wisconsin Avenue, Downers Grove, IL 60515, ID #043030AAR as requested in your notice of incompleteness of August 25, 1994 for our permit #73030535.

We trust that this satisfies your request, but should you require additional information, please contact me at (815) 962-8861.

Sincerely,

James K. Klotz
Environmental Engineer

enc.



2300 Sixth Street, P.O. Box 7000
Rockford, Illinois 61125
815/962-8861
FAX: 815/962-0417

Item #1 Please refer to the attached revised spreadsheet.

Item #2 VOM1 calculations were completed per the formula provided.

Item #3 Calculations in accordance with 218.207(b)(2) are attached.

Item #4 The information supplied covers all of the materials used on the coaters and wash-up for both the coaters and the printers. The printers utilize an ink base system which is 85% minimum solids content. We have included the cumulative quantity of inks used at the facility in our revised spreadsheet above.

With respect to compliance with 218.207(b)(2), our calculations reflect that only the H-23 Lining material fails to satisfy the requirements for overall destruction efficiency. We have determined this as 95% efficiency of the Smith thermal oxidizer times the minimum capture efficiency of 84% as demonstrated in prior permit submissions, for an overall required efficiency of 79.8%.

In reviewing the calculations, there are a number of coatings utilized that are near compliance levels without the use of the thermal oxidizer and therefore, we are overcompliant on these materials. As the emissions of the H-23 material only comprise 14% of our total VOM emissions, clearly our overall average efficiency required would be well below the required 79.8%.

J. L. Clark-Tube Division
Operating Permit Renewal

ID #043030AAR
Permit #73030535

1993

COATING & SOLVENT CALCULATION DETAIL

Material	VOM (lb/gal)	Wt/Gal	Consumed Winter	VOM	Consumed Summer	VOM	75% Control VOM	81% Control VOM	Consumed Total	TOTAL UNCONTR VOM	TOTAL VOM
Coatings											
H-23 Gold Lining	6.30	7.49	411	2588.478	923	5813.054	1453.26	1104.48	1429	8999.84	4041.74
3164 Clear Coating	6.12	8.09	30	183.51	15	91.755	22.94	17.43	25	152.93	206.45
VY8M82026 Yellow	4.76	11.65	133	633.346	56	266.672	66.67	50.67	78	371.44	700.01
IR 1215 Lining	5.93	7.76	22	130.438	38	225.302	56.33	42.81	45	266.81	186.76
10-084A Lining	5.80	7.87	400	2320	480	2784	696.00	528.96	885	5133.00	3016.00
G72-WC-18 White	4.84	11.28	625	3025	859	4157.56	1039.39	789.94	4522	21886.48	4064.39
379W78 White	2.98	12.58	405	1206.9	2453	7309.94	1827.49	1388.89	2334	6955.32	3034.39
IT-404-077 Lining	5.46	8.15	890	4859.4	170	928.2	232.05	176.36	215	1173.90	5091.45
220-W27-1024 White	3.10	11.86	1750	5430.25	2643	8201.229	2050.31	1558.23	4393	13631.48	7480.56
375-W27-5029 Peel White	5.44	9.41	12	65.328	28	152.432	38.11	28.96	40	217.76	103.44
VLM8M80754 Blue Peel	5.24	8.78	10	52.36	5	26.18	6.55	4.97	15	78.54	58.91
3846044 Lining	5.72	7.84	22	125.84	34	194.48	48.62	36.95	56	320.32	174.46
Printing Inks	0.15	1.00	1806	270.9	2188	328.2	82.05	62.36	3994	599.10	352.95
SUBTOTAL				20620.85		30479	7620	5791		59786.9	28511.5
Cleaning Solvent											
660 Solvent	7.02	7.02	1440	10108.8	2736	19206.72			2777	19494.54	29315.52
Thinners											
MEK	6.07	6.07	507	3077.49	585	3550.95	887.74	674.68	5536	33603.52	3965.23
Mineral Spirits	6.49	6.49		0	75	486.75	121.69	92.48	48	311.52	121.69
Glycol Ether DB	8.15	8.15	240	1956	285	2322.75	580.69	441.32	706	5753.90	2536.69
Glycol Ether EB	7.84	7.84	0	0	134	1050.56	262.64	199.61	399	3128.16	262.64
2300 Vinyl	7.62	7.62	145	1104.9	137	1043.94	260.99	198.35	205	1562.10	1365.89
Solvent 150	8.22	8.22	0	0	5	41.1	10.28	7.81	5	41.10	10.28
SUBTOTAL				16247.19		27702.77	2124.013	1614.25		63894.84	37577.92
Less Solvent Disposed	7.02	7.02							1430	10038.60	10038.60
TOTAL UNCONTROLLED VOM										113643.1	56050.82

fnha93

J. L. Clark-Tube Division
1993 Coating Emissions Allowable
Calculations

Material	Coating Density	Total Volatiles	Solids	VOMa	C	D	VOM1 (lbs/gal)	E=[(VOMa-/VOMa)x
Coatings								
H-23 Gold Lining	7.488	0.840	0.16	39.31	3.00	7.36	5.08	87.08
3164 Clear Coating	8.085	0.757	0.24	25.12	3.00	7.36	5.08	79.78
VY8M82026 Yellow	11.650	0.409	0.59	8.05	3.00	7.36	5.08	36.91
ER 1215 Lining	7.757	0.764	0.24	25.15	3.00	7.36	5.08	79.80
10-084A Lining	7.870	0.737	0.26	22.04	3.00	7.36	5.08	76.95
G72-WC-18 White	11.280	0.429	0.57	8.47	3.00	7.36	5.08	40.06
379W78 White	12.580	0.237	0.76	3.90	3.00	7.36	5.08	-30.15
IT-404-077 Lining	8.154	0.667	0.33	16.36	3.00	7.36	5.08	68.95
220-W27-1024 White	8.653	0.262	0.74	3.07	3.00	7.36	5.08	-65.71
375-W27-5029 Peel White	9.410	0.579	0.42	12.94	3.00	7.36	5.08	60.75
VLM8M80754 Blue Peel	8.782	0.596	0.40	12.97	3.00	7.36	5.08	60.82
3846044 Lining	7.840	0.730	0.27	21.14	3.00	7.36	5.08	75.97
Printing Inks	1.000	0.150	0.85	0.18	3.00	7.36	5.08	-2778.67

J. L. Clark-Tube Division
Operating Permit Renewal
Compliance Calculations 218.207(b)(2)

ID #043030AAR
Permit #73030535

1993

COATING & SOLVENT CALCULATION DETAIL

Material	VOM (lb/gal)	Wt/Gal	Consumed Winter	VOM	Consumed Summer	VOM	75% Control VOM	Consumed Total	TOTAL UNCONTR VOM	TOTAL VOM	% Total Emissions
Coatings											
H-23 Gold Lining	6.30	7.49	411	2588.478	923	5813.054	1453.26	1429	8999.84	4041.74	14.18
3164 Clear Coating	6.12	8.09	30	183.51	15	91.755	22.94	25	152.93	206.45	0.72
VY8N82026 Yellow	4.76	11.65	133	633.346	56	266.672	66.67	78	371.44	700.01	2.46
IR 1215 Lining	5.93	7.76	22	130.438	38	225.302	56.33	45	266.81	186.76	0.66
10-084A Lining	5.80	7.87	400	2320	480	2784	696.00	885	5133.00	3016.00	10.58
G72-WC-18 White	4.84	11.28	625	3025	859	4157.56	1039.39	4522	21886.48	4064.39	14.26
379W78 White	2.98	12.58	405	1206.9	2453	7309.94	1827.49	2334	6955.32	3034.39	10.64
IT-404-077 Lining	5.46	8.15	890	4859.4	170	928.2	232.05	215	1173.90	5091.45	17.86
220-W27-1024 White	3.10	11.86	1750	5430.25	2643	8201.229	2050.31	4393	13631.48	7480.56	26.24
375-W27-5029 Peel White	5.44	9.41	12	65.328	28	152.432	38.11	40	217.76	103.44	0.36
VLM8N80754 Blue Peel	5.24	8.78	10	52.36	5	26.18	6.55	15	78.54	58.91	0.21
3846044 Lining	5.72	7.84	22	125.84	34	194.48	48.62	56	320.32	174.46	0.61
Printing Inks	0.15	1.00	1806	270.9	2188	328.2	82.05	3994	599.10	352.95	1.24
TOTAL				20891.75		30479	7619.751		59786.907	28511.5	

tube93b

J.L. CLARK
a member of the CLARCOR consumer products group

July 29, 1994

Mr. Donald E. Sutton
Manager, Permit Section
Division of Air Pollution Control
Illinois Environmental Protection Agency
P. O. Box 19276
Springfield, IL 62794-9276

-CERTIFIED MAIL-
Z 696 008 860

Dear Mr. Sutton:

Enclosed please find documentation on the coating materials utilized at J. L. Clark-Tube Division, 2300 Wisconsin Avenue, Downers Grove, IL 60515, ID #043030AAR as required under our permit 73030535.

This documentation includes calculation of emissions for 1993, calculation for VOMa and E per 218.105(e)(2) and a copy of our previously submitted permit renewal application.

All coating materials were sampled at the coating equipment at the "as applied" viscosity. Most of our coatings are delivered to J. L. Clark at this viscosity and no further reduction is made, however, additional solvent is added to make-up for fugitive losses. Where our suppliers had capability to conduct the VOM analysis, we have utilized their data per our prior conversation with David Hulskotter. On other materials, we are submitting data from an outside laboratory.

We trust that this satisfies the request in special condition #6 of our permit. Should you require any additional information, please contact Jim Klotz or me at (815) 962-8861.

Sincerely,

Gordon E. VerWeyst

Gordon E. VerWeyst
Vice President-Technology

cc: Jim Klotz

enc.

2300 Sixth Street, P.O. Box 7000
Rockford, Illinois 61125

815/962-8861
FAX: 815/962-0417

J. L. Clark-Tube Division
Operating Permit Renewal

ID #043030AAR
Permit #73030535

1993

COATING & SOLVENT CALCULATION DETAIL

Material	VOM (lb/gal)	Wt/Gal	Consumed Winter	VOM	Consumed Summer	VOM	75% Control VOM	81% Control VOM	Consume Total	TOTAL UNCONTR VOM	TOTAL VOM
Coatings											
H-23 Gold Lining	6.30	7.49	411	2588.478	923	5813.054	1453.26	1104.48	1429	8999.84	4041.74
3164 Clear Coating	6.12	8.09	30	183.51	15	91.755	22.94	17.43	25	152.93	206.45
VY8M82026 Yellow	4.76	11.65	133	633.346	56	266.672	66.67	50.67	78	371.44	700.01
XR 1215 Lining	5.93	7.76	22	130.438	38	225.302	56.33	42.81	45	266.81	186.76
10-084A Lining	5.80	7.87	400	2320	490	2784	696.00	528.96	885	5133.00	3016.00
G72-WC-18 White	4.84	11.28	625	3025	859	4157.56	1039.39	789.94	4522	21886.48	4064.39
379W78 White	2.98	12.58	405	1206.9	2453	7309.94	1827.49	1388.89	2334	6955.32	3034.39
IT-404-077 Lining	5.46	8.15	890	4859.4	170	928.2	232.05	176.36	215	1173.90	5091.45
220-W27-1024 White	3.10	11.86	1750	5430.25	2643	8201.229	2050.31	1558.23	4393	13631.48	7480.56
375-W27-5029 Peel White	5.44	9.41	12	65.328	28	152.432	38.11	28.96	40	217.76	103.44
7LM8M80754 Blue Peel	5.24	8.78	10	52.36	5	26.18	6.55	4.97	15	78.54	58.91
3846044 Lining	5.72	7.84	22	125.84	34	194.48	48.62	36.95	56	320.32	174.46
SUBTOTAL				20620.85		30150.8	7537.701	5728.653		59187.81	28158.55
Cleaning Solvent											
660 Solvent	7.02	7.02	1440	10108.8	2736	19206.72			2777	19494.54	29315.52
Thinners											
MEK	6.07	6.07	507	3077.49	585	3550.95	887.74	674.68	5536	33603.52	3965.23
Mineral Spirits	6.49	6.49		0	75	486.75	121.69	92.48	48	311.52	121.69
Glycol Ether DB	8.15	8.15	240	1956	285	2322.75	580.69	441.32	706	5753.90	2536.69
Glycol Ether EB	7.84	7.84	0	0	134	1050.56	262.64	199.61	399	3128.16	262.64
2300 Vinyl	7.62	7.62	145	1104.9	137	1043.94	260.99	198.35	205	1562.10	1365.89
Solvent 150	8.22	8.22	0	0	5	41.1	10.28	7.81	5	41.10	10.28
SUBTOTAL				16247.19		27702.77	2124.013	1614.25		63894.84	37577.92
Less Solvent Disposed	7.02	7.02							1430	10038.60	10038.60
TOTAL UNCONTROLLED VOM										113044	55597.87

J. L. Clark-Tube Division
1993 Coating Emissions Allowable

Material	VOMa (lb/gal)	C	D	1-(C/D)	S C/1-(C/D	VOM1 (lbs/gal)	E=[(VOMa /VOMa]
Coatings							
H-23 Gold Lining	6.30	0.36	6.30	0.94	0.38	0.38	93.94
3164 Clear Coating	6.12	0.36	6.12	0.94	0.38	0.38	93.75
VY8M82026 Yellow	4.76	0.36	4.76	0.92	0.39	0.39	91.82
XR 1215 Lining	5.93	0.36	5.93	0.94	0.38	0.38	93.54
10-084A Lining	5.80	0.36	5.80	0.94	0.38	0.38	93.38
G72-WC-18 White	4.84	0.36	4.84	0.93	0.39	0.39	91.96
379W78 White	2.98	0.36	2.98	0.88	0.41	0.41	86.26
IT-404-077 Lining	5.46	0.36	5.46	0.93	0.39	0.39	92.94
220-W27-1024 White	3.10	0.36	3.10	0.88	0.41	0.41	86.86
375-W27-5029 Peel White	5.44	0.36	5.44	0.93	0.39	0.39	92.91
VLM8M80754 Blue Peel	5.24	0.36	5.24	0.93	0.39	0.39	92.62
3846044 Lining	5.72	0.36	5.72	0.94	0.38	0.38	93.28

V O C CERTIFICATION DATA SHEET

COATING MANUFACTURER: AKZO COATINGS INC.

COATING IDENTIFICATION: 374-C27-5020 (H-23)

THIS COATING IS: SOLVENT BASED

SUPPLIED TO: J.L. CLARK

THE FOLLOWING PROPERTIES ARE: ACTUAL DETERMINATIONS ON COATING AS APPLIED AFTER THINNING

1. COATING DENSITY (ASTM D1475) 7.488 LB./GAL.
2. PERCENT VOLATILE MATTER (ASTM D2369) 84.105
3. VOLATILE ORGANIC CONTENT 6.298 LB./GAL.

SIGNED : Michael L. Hanninen

AKZO COATINGS INC.

DATE : 3-31-94

V O C CERTIFICATION DATA SHEET

COATING MANUFACTURER: AKZO COATINGS INC.

COATING IDENTIFICATION: 374-C27-4033 (XR-3164)

THIS COATING IS: SOLVENT BASED

SUPPLIED TO: J.L. CLARK

THE FOLLOWING PROPERTIES ARE: ACTUAL DETERMINATIONS ON COATING AS APPLIED

1. COATING DENSITY (ASTM D1475) 8.085 LB./GAL.
2. PERCENT VOLATILE MATTER (ASTM D2369) 75.66
3. VOLATILE ORGANIC CONTENT 6.117 LB./GAL.

SIGNED : Michael L. Hammer

AKZO COATINGS INC.

DATE : 3-31-94

V O C CERTIFICATION DATA SHEET

COATING MANUFACTURER: AKZO COATINGS INC.

COATING IDENTIFICATION: 375-Y27-5044 (VY8M82026)

THIS COATING IS: SOLVENT BASED

SUPPLIED TO: J.L. CLARK

THE FOLLOWING PROPERTIES ARE: THEORETICAL DETERMINATIONS ON COATING AS APPLIED

1. COATING DENSITY (ASTM D1475) 11.65 LB./GAL.
2. PERCENT VOLATILE MATTER (ASTM D2369) 40.88
3. VOLATILE ORGANIC CONTENT 4.762 LB./GAL.

SIGNED : Michael L. Hammer

AKZO COATINGS INC.

DATE : 3-31-94

V O C CERTIFICATION DATA SHEET

COATING MANUFACTURER: AKZO COATINGS INC.

COATING IDENTIFICATION: 375-W27-5017 (XR1215)

THIS COATING IS: SOLVENT BASED

SUPPLIED TO: J.L. CLARK

THE FOLLOWING PROPERTIES ARE: ACTUAL DETERMINATIONS ON COATING AS APPLIED AFTER THINNING

1. COATING DENSITY (ASTM D1475) 7.757 LB./GAL.
2. PERCENT VOLATILE MATTER (ASTM D2369) 81.13
3. VOLATILE ORGANIC CONTENT 5.929 LB./GAL.

SIGNED : Michael L. Hanninen

AKZO COATINGS INC.

DATE : 4-4-94

WATSON STANDARD

Executive Offices
P.O. Box 11250
Pittsburgh, PA 15238

Tel 412-362-8300
Fax 412-274-5770

March 23, 1994

J. L. Clark Company
2300 Sixth Street
Rockford, IL 61125

Attention: Mr. Glenn Ceckowski

Dear Glenn:

As we discussed in our telephone conversation, we are already calculating our VOC (VOM) based on the ASTM tests in your letter (ASTM D1475-85 and ASTM D2369-87). I would like to note that the test designated ASTM D2369-87 has been updated twice and is now ASTM D2369-90.

Enclosed is a Certification sheet for 10-084-A as you requested. Please note, the coating is supplied at a running viscosity and no reduction is required. Therefore, the VOC (VOM) reflects the material as used.

I am also including a copy of our standard tests above as listed in our Quality Control Test Methods Manual.

If more information is needed, please let me know.

Very truly yours,

WATSON STANDARD COMPANY

William E. Bremer, Jr.
Director - Sales Service

Enclosure

cc: J. Klotz-J.L.Clark
G. Silke
N. Kadir
D. Dansevicus

WEB/jl

Certificate of Analysis

WATSON STANDARD

PITTSBURGH, PA

CUSTOMER J. L. Clark – Downers Grove, IL

W-S CODE 10-084-A

CUSTOMER CODE

BATCH NUMBER 12-021994-1637

DATE OF SHIPMENT 2/18/94

DATA:	SPECIFIED	SHIPPED
VISCOSITY #4 Ford Cup	17" ± 2"	17"
WEIGHT PER GAL.	7.8 - 8.0 lbs.	7.87 lbs.
WEIGHT % SOLIDS	25.0 ± 2.1 %	26.26 %

COLOR Clear

OTHER

Solvent Based Material

Actual VOC – 5.80#

CERTIFIED BY:

QUALITY ASSURANCE

The Sherwin-Williams Company
11541 S. Champlain Ave.
Chicago, Illinois 60628-5795
Phone (312) 821-3000

March 21, 1994

Mr. Glenn Ceckowski
J.L. Clark
2300 Sixth Street
P.O.Box 7000
Rockford, IL 61125

Dear Mr. Ceckowski:

The "as applied" VOC of G72WC18, white solution vinyl enamel, manufacturing date C2402, is 4.84 pounds/gallon using ASTM 2369-90. This material is a solvent based coating. The weight/gallon of this batch is 11.28 pounds/gallon; the NVM is 57.04% using a 60 minute bake at 230°F. If additional information is required, please contact our Regional Sales Manager, Dan Moit.

David J. Gellert
Supervisor
Paint Quality Assurance Laboratory

13833

Morton

Morton Industrial Coatings

April 6, 1994

Mr. Glenn Ceckowski
J.L. Clark
2300 Sixth Street
P.O. Box 7000
Rockford, Illinois 61125

Dear Glenn:

Per your request, this letter is to certify that the below listed solvent based product, 379W78 was tested in accordance with ASTM D 2369-87.

379W78	2.98 VOC	12.58 Lbs./Gal.

Please note that the VOC is "As applied" without thinning.

If we can be of any further assistance, please call.

Very truly yours,

MORTON INTERNATIONAL, INC.
North Brunswick Facility

Stephen Rendek
Manager Quality Assurance
Lab Manager

SR/pk

Morton International, Inc., CN 6008, North Brunswick, NJ 08902-1697 908/545-9601 Fax 908/545-9421

Admiral
Environmental
Services Inc.
2025 S. Arlington Heights Rd., Suite 103, Arlington Heights, IL 60005-4141 (708) 228-5355 Fax (708) 228-5413

March 23, 1994

Sample Analysis

Lab No: 79-247

J. L. CLARK
DOWNERS GROVE, ILLINOIS

IDENTIFICATION OF MATERIAL:
Two (2) samples, identified as:

- EINN LAKE IT-404 SOLVENT BASED INK
  AS APPLIED 03-10-94
- MEHNERT & VEER IL-320-1528 SOLVENT BASED INK
  AS APPLIED 03-10-94

PROCEDURE:
The samples were analyzed as per 40 CFR Part 60 Method 24.

RESULTS:

Sample ID:	Volatile % by Wt.	Density (gm/mL)	VOC (lbs/gal)
EINN LAKE IT-404	66.61	0.98	5.46
MEHNERT & VEER IL-320-1528	60.94	1.04	5.28

Note: Interlaboratory Confidence Limits are listed in 40 CFR Part 60 as ± 7.5% of the % Water value, ± 4.7% of the % Volatile value and ± 0.002 gm/mL for Density.

By _____
David M. Caskey

DMC:clm

State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director
2200 Churchill Road, Springfield, IL 62794-927

APPLICATION FOR PERMIT RENEWAL/OPERATING PERMIT

FEBRUARY 01, 1994 217/782-2113

APPLICATION NO: 73030535
ID NUMBER: 043030AAR 3503A
OPERATION OF:
ALUMINUM TUBE LINES
LOCATION:
J L CLARK MFG CO - ATLAS TUBE DIV
2300 WISCONSIN AVE
DOWNERS GROVE IL 60515

J L CLARK MANUFACTURING CO
ATTN: JAMES K. KLOTZ CHEIF CHEMIST
2300 6TH ST
ROCKFORD IL 61101

THE ABOVE REFERENCED OPERATING PERMIT WILL EXPIRE ON JULY 31, 1994. THE AGENCY RECOMMENDS THAT YOU APPLY FOR A RENEWAL OF THIS OPERATING PERMIT AT LEAST NINETY (90) DAYS PRIOR TO ITS EXPIRATION.

IF YOUR OPERATION IS UNCHANGED, YOU MAY REQUEST TO RENEW YOUR PERMIT BY SIGNING IN THE SPACE PROVIDED BELOW, KEEPING ONE COPY FOR YOUR RECORDS, A RETURNING THIS CORRESPONDENCE TO THE AGENCY. IF DATED AND SIGNED BY THE

AGENCY THIS APPLICATION WILL BE RETURNED TO YOU AND WILL BE YOUR PERMIT.

IF THERE HAS BEEN A CHANGE OF ADDRESS, PLEASE INDICATE THIS BY CORRECTING THE ABOVE INFORMATION. IF THERE HAS BEEN A CHANGE OF OWNERSHIP, PROPER DOCUMENTATION MUST BE SUBMITTED TO ALLOW TRANSFER OF PERMIT(S). IF YOUR OPERATION HAS CHANGED FROM THAT DESCRIBED IN THE APPLICATION FILED WITH THIS AGENCY, THEN YOU MUST USE APPROPRIATE FORMS TO DESCRIBE ALL CHANGES AS PART OF THE APPLICATION. (SEE ENCLOSED "REQUEST FOR PERMI FORMS" APC-209).

IF THE OPERATION HAS BEEN PERMANENTLY DISCONTINUED, PLEASE SEND A LETTER TO THE AGENCY WITHDRAWING THIS PERMIT. IF THE OPERATION HAS BEEN INCLUDE IN ANOTHER PERMIT, PLEASE PROVIDE THE PERMIT NUMBER OF THE NEW PERMIT(S) AND A LETTER OF EXPLANATION.

I CERTIFY THAT THE ORIGINAL PERMIT INFORMATION REMAINS TRUE, CORRECT, AND CURRENT AND THAT I AM AUTHORIZED TO EXECUTE THIS APPLICATION FOR PERMIT RENEWAL.

Gordon E. VerWright 5/1/94
SIGNATURE DATE PRINTED NAME AND TITLE OF SIGNER

FOR AGENCY USE ONLY

PERMIT EXPIRATION DATE:

PERMIT IS GRANTED TO OPERATE THE ABOVE REFERENCED EQUIPMENT SUBJECT TO STANDARD CONDITIONS ATTACHED HERETO AND ANY SPECIAL CONDITIONS OF THE PREVIOUSLY GRANTED OPERATING PERMIT.

DONALD E. SUTTON, P.E.
MANAGER, PERMIT SECTION
DIVISION OF AIR POLLUTION CONTROL

CC: REGION 126

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State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director
2200 Churchill Road, Springfield, IL 62794-9276

217/782-2113

CERTIFIED MAIL
P 036 051 065

NOTICE OF INCOMPLETENESS

August 25, 1994

J.L. Clark Company
Attn: James K. Klotz
2300 Sixth Street
Rockford, IL 61104

Application No.:	73030535
I.D. No.:	043030AAR
Applicant's Designation:	
Received:	August 1, 1994
Operation of:	Aluminum Tube Lines
Location:	2300 Wisconsin Avenue, Downers Grove

The Agency has determined the above referenced operating permit application(s) to be incomplete because information was not provided as required by 35 Ill. Adm. Code 201.157.

Specifically, the following information must be supplied in order for the application to be considered complete:

1. For purposes of demonstrating compliance with Section 218.207(b)(2), VOMa must be in units of pound VOM/gallon of coating solids. It appears the VOMa you have given is not in these units. Please provide VOMa for the coatings in the correct units.

2. Your coating operation falls under miscellaneous metal parts all other coatings. To determine VOMl the following must be done:

   VOMl = S = C/(1-C/D)
   = 3.0/(1-3/7.36)
   = 5.08 lb VOM/gal solids

3. Please provide calculations and or data that shows you are in compliance with section 218.207(b)(2).

4. You have provided information on the coatings used. Does this include the materials that are used on the printers, or is there additional inks and coatings used with the printers? If there are additional inks and coatings used with the printers provide the amount of each used, the VOM contents and the emissions that result.

The Agency will be pleased to review a reapplication for this permit that includes the necessary information and documentation to correct the deficiencies noted above. In accordance with 35 Ill. Adm. Code 201.157, this reapplication may incorporate by reference the data and information submitted to the Agency in the original permit application, provided that you certify that the data and information previously submitted remains true, correct and current. The reapplication will be considered filed on the date it is received by the Agency and will constitute a new permit application for purposes of Section 39(a) of the Act. Two copies of this information must be submitted and should reference the application and I.D. numbers assigned above.

If you have any questions on this, please call David Hulskotter at 217/782-2113.

Donald E. Sutton for

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:DWH:drk:321Q/sp/89-90

cc: Region 1
Julie Armitage

217-782-2465

J. L. CLARK FAX

a member of the CLARCOR consumer products group

To: David Hulskotter

From: Jim Klotz

Copy:

Ref: J. L. Clark

Sub: Permit Data

Date: February 21, 1995

FAX COPY SENT

FEB 2 2 1995

Total pages 6 including this cover sheet.

MESSAGE

Attached is the data that we discussed last week. We are sending you the original copies by mail. Please contact me at (815) 961-5686 should you have any additional questions.

J.L. CLARK
a member of the CLARCOR consumer products group

February 21, 1995

Mr. David Hulskotter
Division of Air Pollution Control
Permit Section
Illinois Environmental Protection Agency
P. O. Box 19276
Springfield, IL 62794-9276

Dear Mr. Hulskotter:

Enclosed please find documentation on coating materials and calculations utilized at J. L. Clark-Tube Division, 2300 Wisconsin Avenue, Downers Grove, IL 60515, ID #043030AAR as requested in your notice of incompleteness of August 25, 1994 for our permit #73030535.

We trust that this satisfies your request, but should you require additional information, please contact me at (815) 962-8861.

Sincerely,

James K. Klotz
Environmental Engineer

enc.

2300 Sixth Street, P.O. Box 7000
Rockford, Illinois 61125
815/962-8861
FAX: 815/962-0417

Item #1 Please refer to the attached revised spreadsheet.

Item #2 VOM1 calculations were completed per the formula provided.

Item #3 Calculations in accordance with 218.207(b)(2) are attached.

Item #4 The information supplied covers all of the materials used on the coaters and wash-up for both the coaters and the printers. The printers utilize an ink base system which is 85% minimum solids content. We have included the cumulative quantity of inks used at the facility in our revised spreadsheet above.

With respect to compliance with 218.207(b)(2), our calculations reflect that only the H-23 Lining material fails to satisfy the requirements for overall destruction efficiency. We have determined this as 95% efficiency of the Smith thermal oxidizer times the minimum capture efficiency of 84% as demonstrated in prior permit submissions, for an overall required efficiency of 79.8%.

In reviewing the calculations, there are a number of coatings utilized that are near compliance levels without the use of the thermal oxidizer and therefore, we are overcompliant on these materials. As the emissions of the H-23 material only comprise 14% of our total VOM emissions, clearly our overall average efficiency required would be well below the required 79.8%.

J. L. Clark-Tube Division
Operating Permit Renewal

ID #043030AAB
Permit #73030535

1993
COATING & SOLVENT CALCULATION DETAIL

Material	VOM (lb/gal)	Wt/Gal	Consumed Winter	VOM	Consumed Summer	VOM	75% Control VOM	81% Control VOM	Consumed Total	TOTAL UNCONTR VOM	TOTAL VOM
Coatings											
H-23 Gold Lining	6.30	7.49	411	2588.478	923	5813.054	1453.26	1104.48	1429	8999.84	4041.74
3164 Clear Coating	6.12	8.09	30	183.51	15	91.755	22.94	17.43	25	152.93	206.45
VY8N82026 Yellow	4.76	11.65	133	633.346	56	266.672	66.67	50.67	78	371.44	700.01
IR 1215 Lining	5.93	7.76	22	130.438	38	225.302	56.33	42.81	45	266.81	186.76
10-084A Lining	5.80	7.87	400	2320	480	2784	696.00	528.96	885	5133.00	3016.00
G72-WC-18 White	4.84	11.28	625	3025	859	4157.56	1039.39	789.94	4522	21886.48	4064.39
379W78 White	2.98	12.58	405	1206.9	2453	7309.94	1827.49	1388.89	2334	6955.32	3034.39
IT-404-077 Lining	5.46	8.15	890	4859.4	170	928.2	232.05	176.36	215	1173.90	5091.45
220-W27-1024 White	3.10	11.86	1750	5430.25	2643	8201.229	2050.31	1558.23	4393	13631.48	7480.56
375-W27-5029 Peel White	5.44	9.41	12	65.328	28	152.432	38.11	28.96	40	217.76	103.44
VLM8N80754 Blue Peel	5.24	8.78	10	52.36	5	26.18	6.55	4.97	15	78.54	58.91
3B46044 Lining	5.72	7.84	22	125.84	34	194.48	48.62	36.95	56	320.32	174.46
Printing Inks	0.15	1.00	1806	270.9	2188	328.2	82.05	62.36	3994	599.10	352.95
SUBTOTAL				20620.85		30479	7620	5791		59786.9	28511.5
Cleaning Solvent											
660 Solvent	7.02	7.02	1440	10108.8	2736	19206.72			2777	19494.54	29315.52
Thinners											
MEK	6.07	6.07	507	3077.49	585	3550.95	887.74	674.68	5536	33603.52	3965.23
Mineral Spirits	6.49	6.49		0	75	486.75	121.69	92.48	48	311.52	121.69
Glycol Ether DB	8.15	8.15	240	1956	285	2322.75	580.69	441.32	706	5753.90	2536.69
Glycol Ether EB	7.84	7.84	0	0	134	1050.56	262.64	199.61	399	3128.16	262.64
2300 Vinyl	7.62	7.62	145	1104.9	137	1043.94	260.99	198.35	205	1562.10	1365.89
Solvent 150	8.22	8.22	0	0	5	41.1	10.28	7.81	5	41.10	10.28
SUBTOTAL				16247.19		27702.77	2124.013	1614.25		63894.84	37577.92
Less Solvent Disposed	7.02	7.02							1430	10038.60	10038.60
TOTAL UNCONTROLLED VOM										113643.1	56050.82

tube93

J. L. Clark-Tube Division
1993 Coating Emissions Allowable
Calculations

Material	Coating Density	Total Volatiles	Solids	VOMa	C	D	VOM1 (lbs/gal)	E=[(VOMa-/VOMa)x
Coatings								
H-23 Gold Lining	7.488	0.840	0.16	39.31	3.00	7.36	5.08	87.08
3164 Clear Coating	8.085	0.757	0.24	25.12	3.00	7.36	5.08	79.78
VYSN82026 Yellow	11.650	0.409	0.59	8.05	3.00	7.36	5.08	36.91
XR 1215 Lining	7.757	0.764	0.24	25.15	3.00	7.36	5.08	79.80
10-084A Lining	7.870	0.737	0.26	22.04	3.00	7.36	5.08	76.95
G72-WC-18 White	11.280	0.429	0.57	8.47	3.00	7.36	5.08	40.06
379W78 White	12.580	0.237	0.76	3.90	3.00	7.36	5.08	-30.15
IT-404-077 Lining	8.154	0.667	0.33	16.36	3.00	7.36	5.08	68.95
220-W27-1024 White	8.653	0.262	0.74	3.07	3.00	7.36	5.08	-65.71
375-W27-5029 Peel White	9.410	0.579	0.42	12.94	3.00	7.36	5.08	60.75
VLN8N80754 Blue Peel	8.782	0.596	0.40	12.97	3.00	7.36	5.08	60.82
3846044 Lining	7.840	0.730	0.27	21.14	3.00	7.36	5.08	75.97
Printing Inks	1.000	0.150	0.85	0.18	3.00	7.36	5.08	-2778.67

tubca93a

J. L. Clark-Tube Division
Operating Permit Renewal
Compliance Calculations 218.207(b)(2)

ID #043030AAR
Permit #73030535

1993

COATING & SOLVENT CALCULATION DETAIL

Material	VOM (lb/gal)	Wt/Gal	Consumed Winter	VOM	Consumed Summer	VOM	75% Control VOM	Consumed Total	TOTAL UNCONTR VOM	TOTAL VOM	% Total Emissions
Coatings											
H-23 Gold Lining	6.30	7.49	411	2588.478	923	5813.054	1453.26	1429	8999.84	4041.74	14.18
3164 Clear Coating	6.12	8.09	30	183.51	15	91.755	22.94	25	152.93	206.45	0.72
VY8M82026 Yellow	4.76	11.65	133	633.346	56	266.672	66.67	78	371.44	700.01	2.46
IR 1215 Lining	5.93	7.76	22	130.438	38	225.302	56.33	45	266.81	186.76	0.66
10-084A Lining	5.80	7.87	400	2320	480	2784	696.00	885	5133.00	3016.00	10.58
GT2-WC-18 White	4.84	11.28	625	3025	859	4157.56	1039.39	4522	21886.48	4064.39	14.26
379W78 White	2.98	12.58	405	1206.9	2453	7309.94	1827.49	2334	6955.32	3034.39	10.64
IT-404-077 Lining	5.46	8.15	890	4859.4	170	928.2	232.05	215	1173.90	5091.45	17.86
220-W27-1024 White	3.10	11.86	1750	5430.25	2643	8201.229	2050.31	4393	13631.48	7480.56	26.24
375-W27-5029 Peel White	5.44	9.41	12	65.328	28	152.432	38.11	40	217.76	103.44	0.36
VLM8M80754 Blue Peel	5.24	8.78	10	52.36	5	26.18	6.55	15	78.54	58.91	0.21
3846044 Lining	5.72	7.84	22	125.84	34	194.48	48.62	56	320.32	174.46	0.61
Printing Inks	0.15	1.00	1806	270.9	2188	328.2	82.05	3994	599.10	352.95	1.24
TOTAL				20891.75		30479	7619.751		59786.907	28511.5	

tube93b

217-782-2465

J. L. CLARK FAX

a member of the CLARCOR consumer products group

To: David Hulskotter

From: Jim Klotz

Copy:

Ref: J. L. Clark

Sub: Permit Data

Date: February 21, 1995

Total pages 6 including this cover sheet.

MESSAGE

Attached is the data that we discussed last week. We are sending you the original copies by mail. Please contact me at (815) 961-5686 should you have any additional questions.

TRANSMISSION REPORT

THIS DOCUMENT (REDUCED SAMPLE ABOVE)
WAS SENT

** COUNT **
# 6

*** SEND ***

NO	REMOTE STATION I. D.	START TIME		DURATION	#PAGES	COMMENT
1	217 782 2465	2-22-95	13:14	3'41"	6	
			TOTAL	0:03'41"	6	

XEROX TELECOPIER 7020

CALCULATION SHEET

Facility: J.L. Clark MFG. I.D. 043030AAR
Anal Eng DWH PN 73030535
Date 8/23/94 Date Rec. 8/23/94

Operating permit renewal for metal parts coating operation with fume incinerator. Company wants to comply with Section 218.207 (b)(2) equivalency.

No NSPS/NESAP **Legal Flag** o.k. with Julie Armitage to give N.O.I.

VOMA not given in correct units as listed in section 218.105(e)(2)
VOM1 not calculated correctly
Equivalent overall efficiency of the capture system and control device not calculated correctly

Unable to determine if company is in compliance

RECOMMEND REJECT

$$C = \frac{V_p S}{1 - V_p - W}$$

$$C = \frac{D W_p}{1 - D W_p / S - W}$$

where $C \equiv$ lb voc/gal solid

$V_p \equiv$ volume percent ~~vol~~ s

$S \equiv$ Solvent density

$W_p \equiv$ weight percent solvent, oo

$W \equiv$ volume percent of water and/or exempt s v

$D \equiv$ coating density

Illinois Environmental Protection Agency

George Ordija, MSME, P. E.
Environmental Protection Engineer
Field Operations Section
Bureau of Air

1701 South First Avenue, Suite 600
Maywood, Illinois 60153

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708/338-7900
FAX 708/338-7930

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

TO REPORT AN OIL OR HAZARDOUS MATERIAL EMERGENCY CALL:

ILLINOIS 24-HR TELEPHONE:	800/782-7860
NATIONAL RESPONSE CENTER 24-HR TELEPHONE:	800/424-8802
CHEMTREC:	800/424-9300

J.L.CLARK
a member of the CLARCOR consumer products group

December 23, 1993

Mr. Dick Forbes
MC# 11A
Unit Mgr. Air Quality Planning Section
Illinois Environmental Protection Agency
Bureau of Air
P. O. Box 19276
Springfield, IL 62794-9276

CERTIFIED MAIL
P 406 114 824

Dear Mr. Forbes:

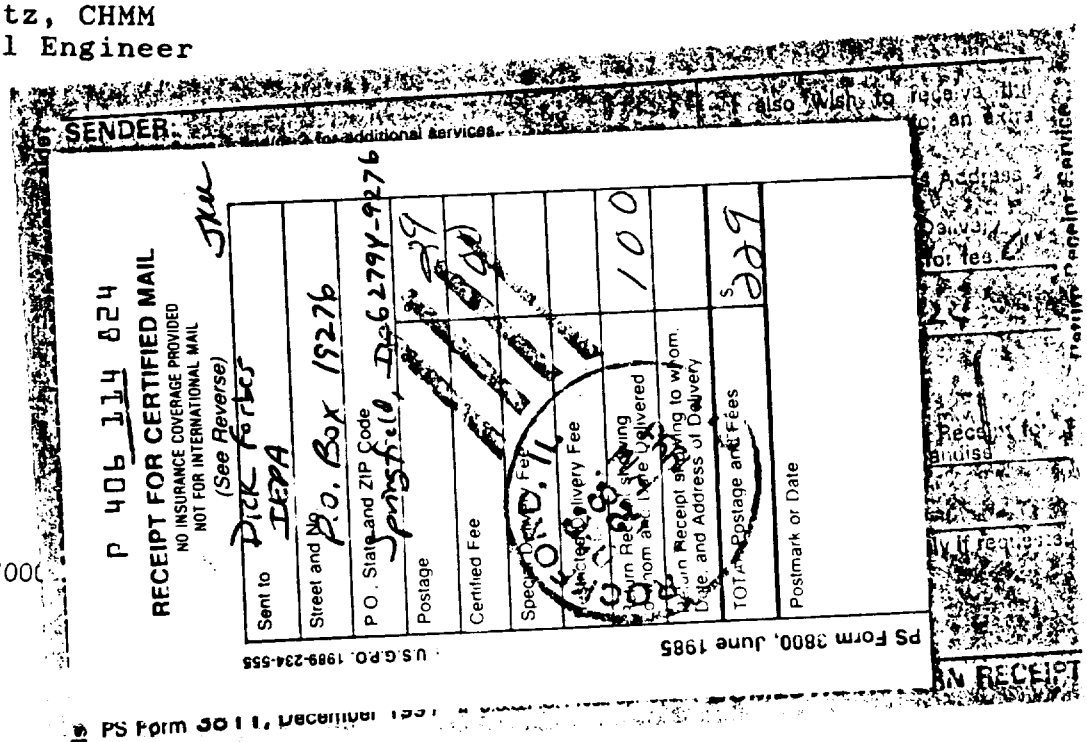
Enclosed please find the completed form for the control device at J. L. Clark - Tube Division, 2300 Wisconsin Avenue, Downers Grove, IL 60515, ID# 043030AAR.

We trust that this satisfies your request, but should you require any additional information, please contact me at (815) 962-8861.

Sincerely,

James K. Klotz, CHMM
Environmental Engineer

enc.



2300 Sixth Street, P.O. Box 7000
Rockford, Illinois 61125
815/962-8861
FAX: 815/962-6356

REQUEST FOR INFORMATION ON CONTROL DEVICES FOR VOM SOURCES

Please use this form (and copies if needed) to report emissions from control equipment for which a preprinted form was not included.

ID Number: 043030AAR

Plant Name: J. L. Clark-Tube Division
Location: 2300 Wisconsin Avenue, Downers Grove

Permit # 73030535
Source # 0002
Source Description: 14 Roller Coaters
Control #0002
Control Description: Capture Hoods and Fume Incinerator

1. Number of burners 1 Rating of each burner 2.62 million BTU/Hr.

2. Fuel used___ Natural gas X Fuel oil:_____ wt % sulfur.

3. Average operating temperature of combustion chamber 1415 F.

4. Average waste gas inlet temperature 250 F.

5. Heat exchanger used ___No X Yes: Thermal efficiency 80 %.

6. Average waste gas outlet (stack) temperature 460 F.

7. Average fuel gas usage 800 std. cu. ft. per hr. (SCFH) or_____gallons per hr. (GPH).

8. VOM Control efficiency 95 %.

9. (a) Seasonal distribution of average operating hours:

0 Hrs.	800 Hrs	1200 Hrs	800 Hrs
(Dec.Jan.Feb.)	(Mar.Apr.May.)	(Jun.Jul.Aug.)	(Sep.Oct.Nov.)

(b) Operating schedule: 20 Avg. hours/day 5 Days/week.

10. Is the control device operated only during the period from April 1 - October 31 pursuant to 35 ILL. Adm. Code section 218.107 or 219.107 ? X Yes _____No.

State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

December 1, 1993

Attn: Plant Manager
J L CLARK MFG CO - ATLAS TUBE DIV
2300 WISCONSIN AVE
DOWNERS GROVE IL 60515

Dear Plant Manager:

As a part of the Bureau of Air's on-going quality assurance program to improve its emissions inventory of ozone precursors, we are reviewing and updating the emissions inventory for control devices used to control volatile organic emissions. When such control devices burn fuel they emit NOx. From the permit record of your company, we have identified one or more such control devices.

Your assistance is requested to complete, as accurately as possible, the attached informational form for each control device at your facility. Based on our records, we have provided the enclosed form(s) with the source name, ID. number and permit and source number(s) listed. A blank form has also been enclosed for your use for any unidentified control devices at your facility. This information will allow the agency to compute the control device's NOx emissions.

Please return the completed form(s) by December 20, 1993, to the attention of Dick Forbes MC# 11A, Unit Mgr. Air Quality Planning Section, Illinois Environmental Protection Agency, Bureau of Air, P.O. Box 19276, Springfield, IL 62794-9276.

Your assistance is greatly appreciated.

Sincerely,

Bharat Mathur

Printed on Recycled Paper

J.L.CLARK

a member of the CLARCOR consumer products group

Date: August 4, 1993

To: John Benton*

By: Jim Klotz

Copies To: Gordon VerWeyst/Greg Gann*

Reference: J. L. Clark - Tube Division

Subject: Air Permit

F162

Attached is a copy of the new operating permit for the Tube Division. The permit conditions are essentially unchanged from our prior permit, other than to incorporate the new calculations which are required as Downers Grove is part of the Chicago Non-attainment Area. The permit is valid only for 1 year and this is limited to the new permitting requirements which will be required under the Clean Air Act of 1990. We were able to justify our emissions on paper as opposed to having to consent to a stack test in order to obtain this permit.

Please review the contents of the permit application and assure that our operations comply with all the necessary parameters. We will be providing you an updated copy of your Community Right-To-Know disk, which will need to be completed on a monthly basis and returned to us so we can complete the calculations identified in the permit application.

There is a new condition to the permit which requires that during the next year we submit data on the volatile organic content of any coatings on an as applied basis, which must be determined by a outside laboratory. We will be adding this topic to the agenda for our STEP meetings to assure that we are in a position to provide this upon renewal of this operating permit.

Should you have any questions, please let us know.

/tkb

Attach.

*Fax'd. 8/4/93

Illinois Environmental Protection Agency · P. O. Box 19276, Springfield, IL 62794-9276

217/782-2113

OPERATING PERMIT

PERMITTEE

J.L. Clark
Attn: James K. Klotz
2300 Sixth Street
Rockford, IL 61104

Application No.: 73030535
I.D. No.: 043030AAR
Applicant's Designation: 3503A
Date Received: July 9, 1993
Subject: Aluminum Tube Lines
Date Issued: July 28, 1993
Expiration Date: July 31, 1994
Location: 2300 Wisconsin Avenue, Downers Grove

Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of a Hinterkopf line consisting of an extrusion press, an annealing oven, a roller coater & printer and a curing oven, 9 existing annealing ovens (8 electric & 1 gas), 9 existing roller coaters for aluminum lines, 9 existing printers, 9 curing ovens for printers, and coaters (4 electric and 5 gas) 3 internal tube lining machines, 3 curing ovens for internal coaters, 3 existing roller coaters for lead lines, and a fume incinerator as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1. The fume incinerator and capture system are required to have an overall efficiency sufficient to limit VOM emissions from the coating operation to no more than what is allowed under Section 218.204 pursuant to Section 218.207(b)(2).

2. The Permittee shall maintain the fume incinerator combustion chamber temperature at the manufacturer's recommended level but not lower than 1400°F.

3. The incinerator shall be equipped with a temperature indicator for afterburner combustion chamber temperature.

4. Emissions of nitrogen oxides from the annealing oven and the curing oven of the Hinterkopf line shall not exceed 0.3 ton per year. This limit is based on maximum heat input rate, 6000 hours of operation per year and the standard emission factors for natural gas combustion.

5. The Permittee shall maintain the following records for the coating operation for 3 years.

   a. Usage of each coating and all other VOM containing materials.
   b. The VOM content of each coating in pounds of VOM/gallon of coating solids as applied.
   c. VOMa and E pursuant to Section 218.105(e)(2).
   d. A log of operating time for the capture system, control device, and the associated coating line.

6. By July 31, 1994, the Permittee shall submit data on the VOM content of the representative coatings as applied, determined by laboratory analysis in accordance with 35 Ill. Adm. Code 218.105(a). The submitted data shall include the VOM content of the coatings, a justification why the coatings are representative, a description of the sampling procedures and documentation for the analysis.

7. Upon renewal of this permit, data and information shall be provided that shows compliance with Section 218.207(b)(2).

8. Pursuant to 35 Ill. Adm. Code 218.107, if odor nuisance or threat to human health does not exist, the Permittee need not operate the incinerator during any time between November 1 of any year to April 1 of the following year during which an ozone advisory, alert or emergency has not been declared pursuant to 35 Ill. Adm. Code 244. If odor nuisance exists or there is a threat to public health, operation of the incinerator is required to control emissions of the coating operations.

If you have any questions on this, please call David Hulskotter at 217/782-2113.

Donald E. Sutton/mcw

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:DWH:jmm/sp0275L/2-3

cc: Region 1
Mary Meyer

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62706

STANDARD CONDITIONS FOR OPERATING PERMITS

July 1, 1985

The Illinois Environmental Protection Act (Illinois Revised Statutes, Chapter 111-1/2, Section 1039) grants the Environmental Protection Agency authority to impose conditions on permits which it issues.

The following conditions are applicable unless superseded by special permit condition(s).

1. The issuance of this permit does not release the permittee from compliance with state and federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or with applicable local laws, ordinances and regulations.

2. The Agency has issued this permit based upon the information submitted by the permittee in the permit application. Any misinformation, false statement or mispresentation in the application shall be grounds for revocation under 35 Ill. Adm. Code 201.207.

3. a. The permittee shall not authorize, cause, direct or allow any modification, as defined in 35 Ill. Adm. Code 201.102, of equipment, operations or practices which are reflected in the permit application as submitted unless a new application or request for revision of the existing permit is filed with the Agency and unless a new permit or revision of the existing permit(s) is issued for such modification.

   b. This permit only covers emission sources and control equipment while physically present at the indicated plant location(s). Unless the permit specifically provides for equipment relocation, this permit is void for an item of equipment on the day it is removed from the permitted location(s) or if all equipment is removed, notwithstanding the expiration date specified on the permit.

4. The permittee shall allow any duly authorized agent of the Agency, upon the presentation of credentials, at reasonable times:

   a. to enter the permittee's property where actual or potential effluent, emission or noise sources are located or where any activity is to be conducted pursuant to this permit,

   b. to have access to and to copy any records required to be kept under the terms and conditions of this permit,

   c. to inspect, including during any hours of operation of equipment constructed or operated under this permit, such equipment and any equipment required to be kept, used, operated, calibrated and maintained under this permit,

   d. to obtain and remove samples of any discharge or emission of pollutants, and

   e. to enter and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring or recording any activity, discharge or emission authorized by this permit.

5. The issuance of this permit:

   a. shall not be considered as in any manner affecting the title of the premises upon which the permitted facilities are located,

   b. does not release the permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the facilities,

c. does not take into consideration or attest to the structural stability of any unit or part of the project, and

d. in no manner implies or suggests that the Agency (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the proposed equipment or facility.

6. The facilities covered by this permit shall be operated in such a manner that the disposal of air contaminants collected by the equipment shall not cause a violation of the Environmental Protection Act or regulations promulgated thereunder.

7. The permittee shall maintain all equipment covered under this permit in such a manner that the performance of such equipment shall not cause a violation of the Environmental Protection Act or regulations promulgated thereunder.

8. The permittee shall maintain a maintenance record on the premises for each item of air pollution control equipment. This record shall be made available to any agent of the Environmental Protection Agency at any time during normal working hours and/or operating hours. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9. No person shall cause or allow continued operation during malfunction, breakdown or startup of any emission source or related air pollution control equipment if such operation would cause a violation of an applicable emission standard or permit limitation. Should a malfunction, breakdown or startup occur which results in emissions in excess of any applicable standard or permit limitation, the permittee shall:

   a. immediately report the incident to the Agency's Regional Field Operations Section Office by telephone, telegraph, or other method as constitutes the fastest available alternative, and shall comply with all reasonable directives of the Agency with respect to the incident;

   b. maintain the following records for a period of no less than two (2) years:

      i. date and duration of malfunction, breakdown or startup,

      ii. full and detailed explanation of the cause,

      iii. contaminants emitted and an estimate of quantity of emissions,

      iv. measures taken to minimize the amount of emissions during the malfunction, breakdown or startup, and

      v. measures taken to reduce future occurrences and frequency of incidents.

10. If the permit application contains a compliance program and project completion schedule, the permittee shall submit a project completion status report within thirty (30) days of any date specified in the compliance program and project completion schedule or at six month intervals, whichever is more frequent.

11. The Permittee shall submit an Annual Emission Report as required by 35 Ill. Adm. Code. 201.302 and 35 Ill. Adm. code Part 254.

Illinois Environmental Protection Agency · P. O. Box 19276, Springfield, IL 62794-9276

217/782-2113

OPERATING PERMIT

PERMITTEE

J.L. Clark
Attn: James K. Klotz
2300 Sixth Street
Rockford, IL 61104

Application No.: 73030535
I.D. No.: 043030AAR
Applicant's Designation: 3503A
Date Received: July 9, 1993
Subject: Aluminum Tube Lines
Date Issued: July 28, 1993
Expiration Date: July 31, 1994
Location: 2300 Wisconsin Avenue, Downers Grove

Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of a Hinterkopf line consisting of an extrusion press, an annealing oven, a roller coater & printer and a curing oven, 9 existing annealing ovens (8 electric & 1 gas), 9 existing roller coaters for aluminum lines, 9 existing printers, 9 curing ovens for printers, and coaters (4 electric and 5 gas) 3 internal tube lining machines, 3 curing ovens for internal coaters, 3 existing roller coaters for lead lines, and a fume incinerator as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1. The fume incinerator and capture system are required to have an overall efficiency sufficient to limit VOM emissions from the coating operation to no more than what is allowed under Section 218.204 pursuant to Section 218.207(b)(2).

2. The Permittee shall maintain the fume incinerator combustion chamber temperature at the manufacturer's recommended level but not lower than 1400°F.

3. The incinerator shall be equipped with a temperature indicator for afterburner combustion chamber temperature.

4. Emissions of nitrogen oxides from the annealing oven and the curing oven of the Hinterkopf line shall not exceed 0.3 ton per year. This limit is based on maximum heat input rate, 6000 hours of operation per year and the standard emission factors for natural gas combustion.

5. The Permittee shall maintain the following records for the coating operation for 3 years.

   a. Usage of each coating and all other VOM containing materials.
   b. The VOM content of each coating in pounds of VOM/gallon of coating solids as applied.
   c. VOMa and E pursuant to Section 218.105(e)(2).
   d. A log of operating time for the capture system, control device, and the associated coating line.

6. By July 31, 1994, the Permittee shall submit data on the VOM content of the representative coatings as applied, determined by laboratory analysis in accordance with 35 Ill. Adm. Code 218.105(a). The submitted data shall include the VOM content of the coatings, a justification why the coatings are representative, a description of the sampling procedures and documentation for the analysis.

7. Upon renewal of this permit, data and information shall be provided that shows compliance with Section 218.207(b)(2).

8. Pursuant to 35 Ill. Adm. Code 218.107, if odor nuisance or threat to human health does not exist, the Permittee need not operate the incinerator during any time between November 1 of any year to April 1 of the following year during which an ozone advisory, alert or emergency has not been declared pursuant to 35 Ill. Adm. Code 244. If odor nuisance exists or there is a threat to public health, operation of the incinerator is required to control emissions of the coating operations.

If you have any questions on this, please call David Hulskotter at 217/782-2113.

Donald E. Sutton/mm

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:DWH:jmm/sp0275L/2-3

cc: Region 1
Mary Meyer

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62706

STANDARD CONDITIONS FOR OPERATING PERMITS

July 1, 1985

The Illinois Environmental Protection Act (Illinois Revised Statutes, Chapter 111-1/2, Section 1039) grants the Environmental Protection Agency authority to impose conditions on permits which it issues.

The following conditions are applicable unless superseded by special permit condition(s).

1. The issuance of this permit does not release the permittee from compliance with state and federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or with applicable local laws, ordinances and regulations.

2. The Agency has issued this permit based upon the information submitted by the permittee in the permit application. Any misinformation, false statement or mispresentation in the application shall be grounds for revocation under 35 Ill. Adm. Code 201.207.

3. a. The permittee shall not authorize, cause, direct or allow any modification, as defined in 35 Ill. Adm. Code 201.102, of equipment, operations or practices which are reflected in the permit application as submitted unless a new application or request for revision of the existing permit is filed with the Agency and unless a new permit or revision of the existing permit(s) is issued for such modification.

   b. This permit only covers emission sources and control equipment while physically present at the indicated plant location(s). Unless the permit specifically provides for equipment relocation, this permit is void for an item of equipment on the day it is removed from the permitted location(s) or if all equipment is removed, notwithstanding the expiration date specified on the permit.

4. The permittee shall allow any duly authorized agent of the Agency, upon the presentation of credentials, at reasonable times:

   a. to enter the permittee's property where actual or potential effluent, emission or noise sources are located or where any activity is to be conducted pursuant to this permit,

   b. to have access to and to copy any records required to be kept under the terms and conditions of this permit,

   c. to inspect, including during any hours of operation of equipment constructed or operated under this permit, such equipment and any equipment required to be kept, used, operated, calibrated and maintained under this permit,

   d. to obtain and remove samples of any discharge or emission of pollutants, and

   e. to enter and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring or recording any activity, discharge or emission authorized by this permit.

5. The issuance of this permit:

   a. shall not be considered as in any manner affecting the title of the premises upon which the permitted facilities are located,

   b. does not release the permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the facilities,

c. does not take into consideration or attest to the structural stability of any unit or part of the project, and

d. in no manner implies or suggests that the Agency (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the proposed equipment or facility.

6. The facilities covered by this permit shall be operated in such a manner that the disposal of air contaminants collected by the equipment shall not cause a violation of the Environmental Protection Act or regulations promulgated thereunder.

7. The permittee shall maintain all equipment covered under this permit in such a manner that the performance of such equipment shall not cause a violation of the Environmental Protection Act or regulations promulgated thereunder.

8. The permittee shall maintain a maintenance record on the premises for each item of air pollution control equipment. This record shall be made available to any agent of the Environmental Protection Agency at any time during normal working hours and/or operating hours. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9. No person shall cause or allow continued operation during malfunction, breakdown or startup of any emission source or related air pollution control equipment if such operation would cause a violation of an applicable emission standard or permit limitation. Should a malfunction, breakdown or startup occur which results in emissions in excess of any applicable standard or permit limitation, the permittee shall:

   a. immediately report the incident to the Agency's Regional Field Operations Section Office by telephone, telegraph, or other method as constitutes the fastest available alternative, and shall comply with all reasonable directives of the Agency with respect to the incident;

   b. maintain the following records for a period of no less than two (2) years:

      i. date and duration of malfunction, breakdown or startup,

      ii. full and detailed explanation of the cause,

      iii. contaminants emitted and an estimate of quantity of emissions,

      iv. measures taken to minimize the amount of emissions during the malfunction, breakdown or startup, and

      v. measures taken to reduce future occurrences and frequency of incidents.

10. If the permit application contains a compliance program and project completion schedule, the permittee shall submit a project completion status report within thirty (30) days of any date specified in the compliance program and project completion schedule or at six month intervals, whichever is more frequent.

11. The Permittee shall submit an Annual Emission Report as required by 35 Ill. Adm. Code. 201.302 and 35 Ill. Adm. code Part 254.

217-782-2465

J. L. CLARK FAX

a member of the CLARCOR consumer products group

FAX COPY SEN
JUL - 9 1993

To: David Hulskotter

Date: July 9, 1993

From: Jim Klotz

Copy:

Ref: J. L. Clark

FAX COPY SENT
JUL 1 2 1993

Sub: Calculations

Total pages 4 including this cover sheet.

MESSAGE

Following up our discussion and the letter of incompleteness of June 22, 1993 for our application #73030535 for ID #043030AAR for J. L. Clark-Tube Division, we are forwarding the attached information for your review:

1) The overall efficiency of the fume incinerator is 95% per our permit application. If the question is relative to our capture efficiency, the data submitted to Mr. Gupta in August 1988 supports an average capture efficiency of 81.4%. There were some coatings in use at that time that did meet the 75% minimum criteria, however we are confident that we would exceed the 81% overall on any given day. As we discussed, we do not run the same coatings and lines each day so the emissions would be variable on a daily basis.

2) Attached are the calculations as you suggested under 218.207(b)(2). Please review and advise if these appear to be correct and how this is interpretted by the Agency.

3) Attached are the revised flow chart and plot plan for the facility with the noted emissions points and which items are controlled through incineration.

Thank you for your assistance in this effort. If this addresses your concerns we will forward formal copies to you by mail. Once you have reviewed, please call me at 815-961-5686 so we can complete your requests.

Illinois Environmental Protection Agency · P. O. Box 19276, Springfield, IL 62794-9276

217/782-2113

CERTIFIED MAIL
P 435 100 584

NOTICE OF INCOMPLETENESS

June 22, 1993

J.L. Clark Inc.
Attn: James K. Klotz
2300 Sixth Street
Rockford, IL 61104

Application No.:	73030535
I.D. No.:	043030AAR
Applicant's Designation:	3503A
Received:	June 7, 1993
Operation of:	Aluminum Tube Lines
Location:	2300 Wisconsin Avenue, Downers Grove

The Agency has determined the above referenced operating permit application(s) to be incomplete because information was not provided as required by 35 Ill. Adm. Code 201.157.

Specifically, the following information must be supplied in order for the application to be considered complete:

1. The application failed to demonstrate compliance with Section 218.207(b)(1). An overall control efficiency of 81 percent is required, our past records indicate the fume incinerator is approximately 75 percent efficient.

2. J.L. Clark Inc. may want to comply with Section 218.207(b)(2). If this option is chosen, provide necessary data and calculations that show compliance with this section. This section requires the system used to control VOM from the coating lines to have an overall efficiency sufficient to limit VOM emissions per line to no more than what is allowed under Section 218.204.

3. On your flow diagram include the fume incinerator and show which lines are controlled by it.

The Agency will be pleased to review a reapplication for this permit that includes the necessary information and documentation to correct the deficiencies noted above. In accordance with 35 Ill. Adm. Code 201.157, this reapplication may incorporate by reference the data and information submitted to the Agency in the original permit application, provided that you certify that the data and information previously submitted remains true, correct and current. The reapplication will be considered filed on the date it is received by the Agency and will constitute a new permit application for purposes of Section 39(a) of the Act. Two copies of this information must be submitted and should reference the application and I.D. numbers assigned above.

The Agency will be pleased to review a reapplication for this permit that includes the necessary information and documentation to correct the deficiencies noted above. In accordance with 35 Ill. Adm. Code 201.157, this reapplication may incorporate by reference the data and information submitted to the Agency in the original permit application, provided that you certify that the data and information previously submitted remains true, correct and current. The reapplication will be considered filed on the date it is received by the Agency and will constitute a new permit application for purposes of Section 39(a) of the Act. Two copies of this information must be submitted and should reference the application and I.D. numbers assigned above.

If you have any questions on this, please call David Hulskotter at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:DWH:jmm/sp/620N/92-93

cc: Region 1

FACILITY 043030AAR - J L CLARK MFG CO - ATLAS TUBE DIV
OWNER:
FACILITY PHONE:

The following problems were encountered with the information reported for this facility:

SOURCE DATA:
Source contact missing.
Mailing contact missing.

CONTROL DEVICES:
Control Device 0002 has no removal efficiency data.

STACKS:
Stack 0003 has invalid velocity. (Valid values are 0-6000).
Stack 0004 has invalid temperature. (Valid values are 50-1800).
Stack 0005 has invalid temperature. (Valid values are 50-1800).
Stack 0006 has invalid velocity. (Valid values are 0-6000).
Stack 0009 has invalid temperature. (Valid values are 50-1800).

J.L.CLARK
a member of the CLARCOR consumer products group

June 1, 1993

Ms. Mary Meyer
State of Illinois
Environmental Protection Agency
Division of Legal Counsel
2200 Churchill Road
Springfield, Illinois 62794-9276

- Certified Mail -
P 906 144 617

Dear Ms. Meyer:

Confirming our phone conversation of today, enclosed please find the completed response sheet to the compliance inquiry letter for J. L. Clark, 2300 Wisconsin Avenue, Downers Grove, Illinois, ID #043030AAR, Permit #73030535.

We will review with David Hulskotter at the Permit Section any details relative to the permit application and complete such on or before June 11, 1993. Should you have any questions, please let us know.

Sincerely,

Gordon E. VerWeyst

Gordon E. VerWeyst
Vice President Technology
/tkb

Enclosure

bcc: Jim Kotz

P 906 144 617
Certified Mail Receipt
No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sent to Mary Meyer IEPA
Street & No. 2200 Churchill Rd
P.O., State & ZIP Code Springfield Il 62794-9276
Postage $ .29
Certified Fee 1.00
Special Delivery Fee
Restricted Delivery Fee
Return Receipt Showing to Whom & Date Delivered 1.00
Return Receipt Showing to Whom, Date, & Address of Delivery
TOTAL Postage & Fees $ 2.29
Postmark or Date

June 1990

2300 Sixth Street, P.O. Box 7000
Rockford, Illinois 61125
815/962-8861
FAX: 815/962-6356

RESPONSE SHEET
TO
COMPLIANCE INQUIRY LETTER

Company Mailing Address: ID #043030AAR

2300 Sixth Street Permit #73030535
Rockford, Illinois 61104

Site Address:

J.L. Clark
2300 Wisconsin Avenue
Downers Grove

Source or Sources in question:

Aluminum Tube Lines

Please answer the following questions for each source:	Yes	or	No
. Is the source in question currently in operation?	x		___
. How long has this source been operating?	10 / 01/ 92		
. If the source is not operating, please give the last operating date: ___/___/___			

Name: Gordon E. VerWeyst

Title: Vice President - Technology

Phone: 815/962-8861

Address: 2300 Sixth Street
Rockford, IL 61104

Signature: Gordon E. VerWeyst

Date: 6 / 1 / 93

Return this Response Sheet to:

IEPA, Division of Legal Counsel
Mary Meyer
2200 Churchill Road
P.O. Box 19276
Springfield, Illinois 62794-9276

MS:MM:bjh/946v/61

J.L.CLARK
a member of the CLARCOR consumer products group

June 1, 1993

Mr. David Hulskotter
Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section
P.O. Box 19276
Springfield, Illinois 62794-9276

- Certified Mail -
P 906 144 618

Dear Mr. Hulskotter:

Enclosed please find two copies of a completed application for renewal of an air permit for J. L. Clark - Tube Division, 2300 Wisconsin Avenue, Downers Grove, Illinois 60515, I.D. #043030AAR, Permit #73030535. This is in response to the Notice of Incompleteness dated December 10, 1992.

As we had indicated in our initial application, the operation is unchanged since our last permit revision of June 6, 1990. We are enclosing updated flow diagrams and a plot plan for the facility which corrects one annealing oven that was previously indicated to be electric and is actually gas fired. This will adjust our production line totals to include:

10 annealing ovens (3 gas, 7 electric)
10 roller coaters, printers and curing ovens (6 gas, 4 electric)
3 curing ovens for internal coaters (2 gas, 1 electric)
3 internal lining machines
1 Smith thermal fume incinerator

These totals reflect the nomenclature change on the "Hinterkopf" line to the new designation of "3S".

Please be advised that in this interim period from our old permit, that our afterburner has continued in operation in accordance with Section 218.207 and Section 218.107. Documentation for material usage and afterburner operation is also being maintained.

We trust that this submission address the Notice of Incompleteness and the change in regulation to 35 Ill. Adm. Code Section 218. Should you have any questions, please contact me or Jim Klotz at (815) 962-8861.

Sincerely,

Gordon E. VerWeyst

Gordon E. VerWeyst
Vice President Technology
/tkb

cc: Jim Klotz
Mary Meyer, IEPA

2300 Sixth Street, P.O. Box 7000
Rockford, Illinois 61125
815/962-8861
FAX: 815/962-6356

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62706

This agency is authorized [illegible] information under Illinois [illegible] Statutes, [illegible] Chapter [illegible] Section 1039. [illegible] of this [illegible] required under that section. [illegible] to do so may prevent this [illegible] being processed and could [illegible] your application being denied. This form has been approved by the Forms Management Center.

APPLICATION FOR RENEWAL OF AN OPERATING PERMIT	FOR AGENCY USE ONLY
Ten annealing ovens, roll coater & printers, three internal spray machines and curing ovens and Smith fume incinerator (A)	I. D. NO. _____
OPERATION OF: (SAME AS 9c ON PAGE 2)	PERMIT NO. _____
	DATE _____

1a. NAME OF OWNER: CLARCOR, Inc.		2a. NAME OF OPERATOR: J. L. Clark, Inc.	
1b. STREET ADDRESS OF OWNER: 2323 Sixth Street		2b. STREET ADDRESS OF OPERATOR: 2300 Sixth Street	
1c. CITY OF OWNER: Rockford		2c. CITY OF OPERATOR: Rockford	
1d. STATE OF OWNER: Illinois	1e. ZIP CODE: 61104	2d. STATE OF OPERATOR: Illinois	2e. ZIP CODE: 61104

3a. NAME OF CORPORATE DIVISION OR PLANT: J. L. Clark - Tube Division		3b. STREET ADDRESS OF EMISSION SOURCE: 2300 Wisconsin Avenue		
3c. CITY OF EMISSION SOURCE: Downers Grove	3d. LOCATED WITHIN CITY LIMITS: [x] YES [ ] NO	3e. TOWNSHIP: Lisle	3f. COUNTY: DuPage	3g. ZIP CODE: 60515

4. ALL CORRESPONDENCE TO: (TITLE AND/OR NAME OF INDIVIDUAL) James K. Klotz/Environmental Engineer	5. TELEPHONE NUMBER FOR AGENCY TO CALL: 815/962-8861
6. ADDRESS FOR CORRESPONDENCE: [ ] OWNER [x] OPERATOR [ ] EMISSION SOURCE	7. YOUR DESIGNATION FOR THIS APPLICATION: (B) 3 5 0 3 A _ _ _ _ _

8. THE UNDERSIGNED HEREBY MAKES APPLICATION FOR A PERMIT AND CERTIFIES THAT THE STATEMENTS CONTAINED HEREIN ARE TRUE AND CORRECT, AND FURTHER CERTIFIES THAT ALL PREVIOUSLY SUBMITTED INFORMATION REFERENCED IN THIS APPLICATION REMAINS TRUE, CORRECT AND CURRENT. BY AFFIXING HIS SIGNATURE HERETO HE FURTHER CERTIFIES THAT HE IS AUTHORIZED TO EXECUTE THIS APPLICATION.

AUTHORIZED SIGNATURE(S): (C)

BY Gordon E. VerWeyst 6/3/93	BY Ronald A Moreau 6/3/93
SIGNATURE DATE	SIGNATURE DATE
Gordon E. VerWeyst	Ronald A. Moreau
TYPED OR PRINTED NAME OF SIGNER	TYPED OR PRINTED NAME OF SIGNER
Vice President - Technology	President
TITLE OF SIGNER	TITLE OF SIGNER

(A) THIS FORM IS TO PROVIDE THE AGENCY WITH GENERAL INFORMATION ABOUT THE EQUIPMENT TO BE OPERATED.

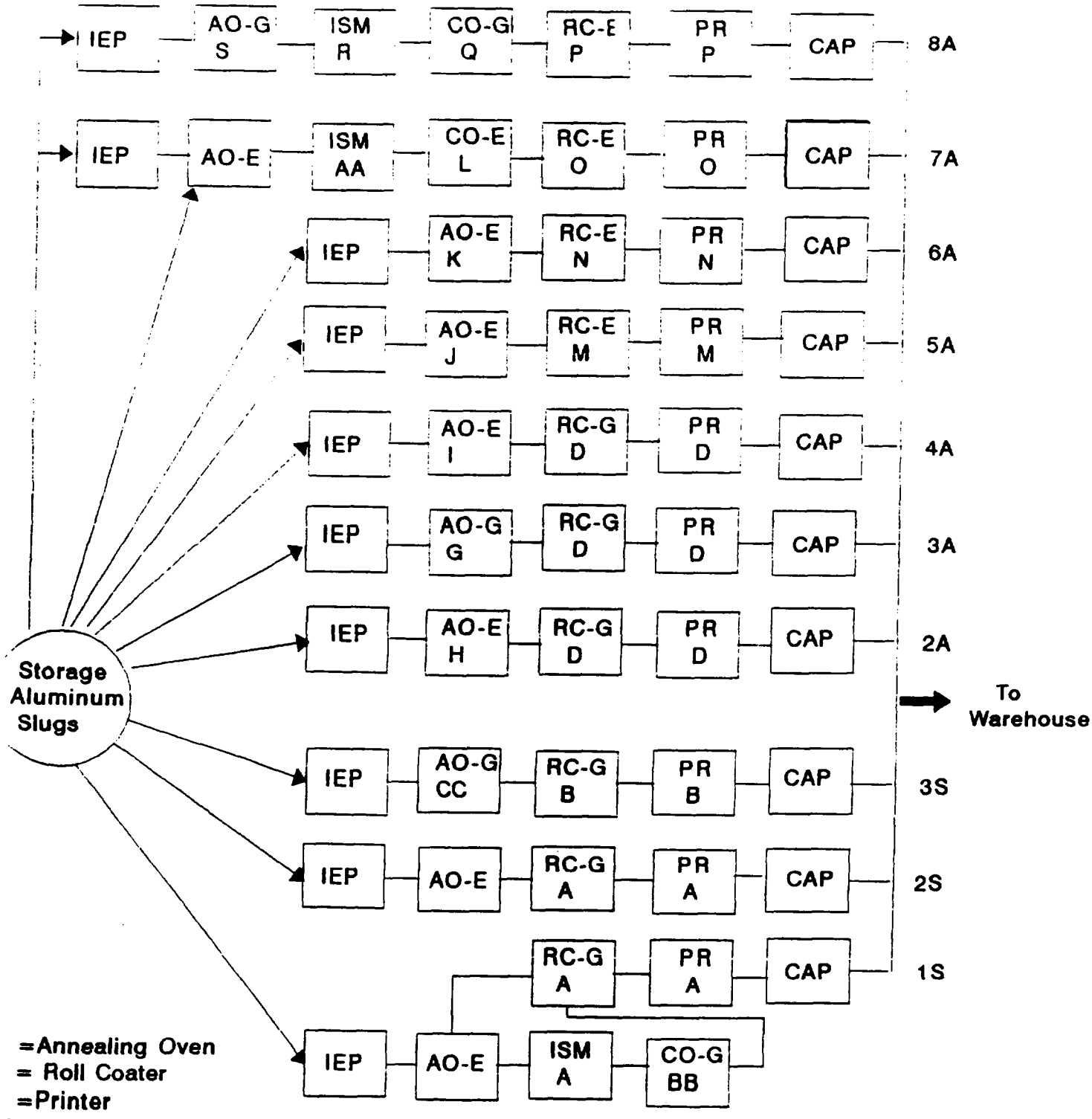
(B) PROVIDE A DESIGNATION IN ITEM 7 ABOVE WHICH YOU WOULD LIKE THE AGENCY TO USE FOR IDENTIFICATION OF YOUR EQUIPMENT. YOUR DESIGNATION WILL BE REFERENCED IN CORRESPONDENCE FROM THIS AGENCY RELATIVE TO THIS APPLICATION. YOUR DESIGNATION MUST NOT [illegible]TION EXCEED TEN (10) CHARACTERS.

(C) THIS APPLICATION MUST BE SIGNED IN ACCORDANCE WITH 35 ILL. ADM. CODE 201.154 or 201.159 WHICH STATES: "ALL APPLICATIONS AND SUPPLEMENTS THERETO SHALL BE SIGNED BY THE OWNER AND OPERATOR OF THE EMISSION SOURCE OR AIR POLLUTION CONTROL EQUIPMENT, OR THEIR AUTHORIZED AGENT, AND SHALL BE ACCOMPANIED BY EVIDENCE OF AUTHORITY TO SIGN THE APPLICATION."

IF THE OWNER OR OPERATOR IS A CORPORATION, SUCH CORPORATION MUST HAVE ON FILE WITH THE AGENCY A CERTIFIED COPY OF A RESOLUTION OF THE CORPORATION'S BOARD OF DIRECTORS AUTHORIZING THE PERSONS SIGNING THIS APPLICATION TO CAUSE OR ALLOW THE CONTRUCTION OR OPERATION OF THE EQUIPMENT TO BE COVERED BY THE PERMIT.

J. L. Clark - Tube Division

Flow Diagram

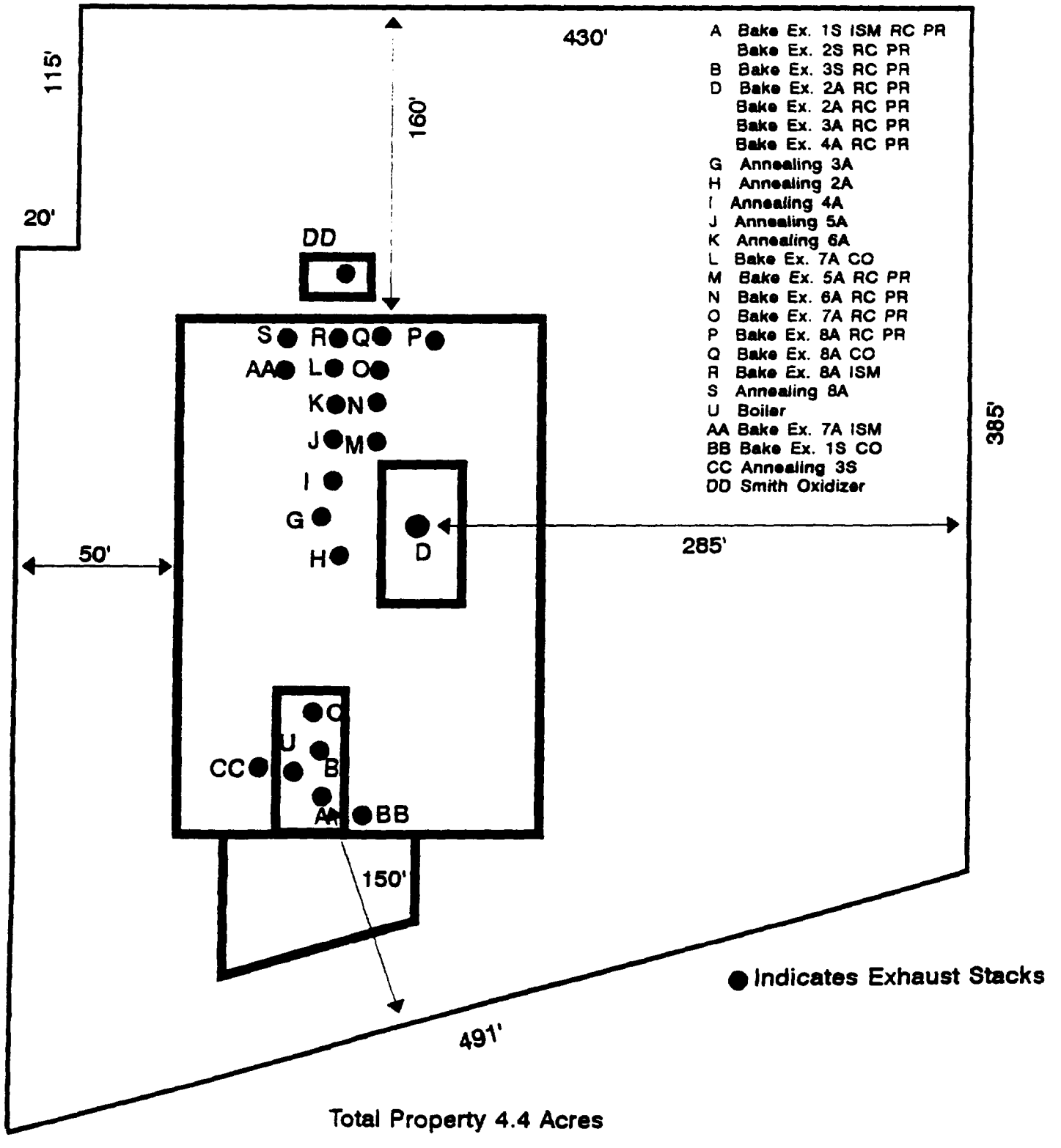


=Annealing Oven
= Roll Coater
=Printer
=Internal Spray Machine
=Impact Extrusion Press
=Capping Operation
=Curing Oven
=Elcetric
=Gas

Letter under equipment code indicates emission source on plot plan.

J. L. Clark - Tube Division

Plot Plan



Total Property 4.4 Acres

J. L. Clark–Tube Division
Operating Permit Renewal

ID #043030AAR
Permit #73030535

COATING & SOLVENT CALCULATION DETAIL

Material	VOM (lb/gal)	Wt/Gal	Consumed Winter	VOM	Consumed Summer	VOM	Consumed Total	TOTAL VOM
Coatings								
H–23 Gold Lining	6.16	7.51	685	4219.6	744	4583.04	1429	8802.64
3164 Clear Coating	6.29	8.05	0	0	25	157.25	25	157.25
3817 Peel Coating	6.70	9.57	22	147.4	24	160.8	46	308.20
VY8M82026 Yellow	7.36	11.69	47	345.92	31	228.16	78	574.08
XR 1215 Lining	6.90	8.07	31	213.9	14	96.6	45	310.50
10–084A Lining	5.51	7.49	415	2286.65	470	2589.7	885	4876.35
G72–WC–18 White	7.29	11.56	2041	14878.89	2481	18086.49	4522	32965.38
379W67 White	4.52	12.49	440	1988.8	1894	8560.88	2334	10549.68
IT–404–077 Lining	5.41	8.2	110	595.1	105	568.05	215	1163.15
SUBTOTAL				24676.26		35030.97		59707.23
Cleaning Solvent								
660 Solvent	7.02	7.02	1300	9126	1477	10368.54	2777	19494.54
Thinners								
MEK	6.07	6.07	2552	15490.64	2984	18112.88	5536	33603.52
Mineral Spirits	6.49	6.49	20	129.8	28	181.72	48	311.52
Glycol Ether DB	8.15	8.15	128	1043.2	578	4710.7	706	5753.90
Glycol Ether EB	7.84	7.84	85	666.4	314	2461.76	399	3128.16
2300 Vinyl	7.62	7.62	73	556.26	132	1005.84	205	1562.10
SUBTOTAL				27012.3		36841.44		63853.74
Less Solvent Disposed	7.02	7.02					924	6486.48
TOTAL UNCONTROLLED VOM								117074.5

1. The specific method of compliance for this facility would be 35 Ill. Adm. Code Section 218.207. The facility utilizes mostly coating materials that exceed the 3.0 lb/gal. VOM emission limitation (Section 218.204 (i)(4) - miscellaneous Metal Parts and Products Coating) but complies by the use of a thermal oxidizer for emissions from all lines.

   The Smith thermal fume incinerator was installed in 1988 and is a 10,000 SCFM, 80% heat exchange with a design destruction efficiency of 95%. The unit currently operates with flowrate of approximately 8,100 SCFM.

   Detailed calculations reflecting emissions for the coating operations are attached. These reflect the overall control to an 81% overall reduction in emissions. The calculations also reflect the requirement of Section 218.107 which does not require operation of the afterburner from November 1 - April 1.

2. The amount of coatings used and VOM contents are reflected in the calculation summary under #1.

3. The amount of cleaning solvents used per year are also reflected in the calculation summary. J. L. Clark - Tube Division collects waste solvents used for cleaning purposes and they are recycled by Hydrite Chemical in Cottage Grove, WI. The calculations reflect the total quantity sent for off-site processing and thereby reduces the total VOM contribution for cleaning solvents.

4. The printing operations are an offset printing covered by 35 Ill. Adm. Code Section 218.405. Under this section, the total VOM emissions do not exceed 100 tons, thereby exempting them under 218.405(a)(2). As required, the facility maintains material usage records with VOM content between 7-15% by weight. A summary of total ink contribution to VOM is attached. Despite the exemption, all printed items undergo addition oven curing in the operation and this exhaust is also vented to the Smith thermal oxidizer for destruction.

   The only solvent used in the printing operation would be the 660 solvent which is used for cleaning purposes jointly with the coating operations. The VOM calculations are included with the solvent detail.

J. L. Clark - Tube Division
Operating Permit Renewal

ID #043030AAR
Permit #73030535

Coating Emission Calculations - VOM (lb/gal)

Total Winter (Uncontrolled Emissions)		
Coating Contribution		24676.26
Cleaning and Thinning Contribution		27012.30
	Subtotal	51688.56
Total Summer (Controlled Emissions)		
Coating Contribution		35030.97
Thinning Contribution		26472.90
		61503.87
Overall Reduction (VOM x 85% capture x 95% destruction)	-	49664.37
		11839.50
Cleaning Contribution		10368.54
	Subtotal	22208.04
Total Potential Emissions		73896.60
Less Solvent Off-Site for Reclamation	-	6486.48
Total Annual Coating Emissions		67410.12
		(33.7 tons)

J. L. Clark - Tube Division
Operating Permit Renewal

ID #043030AAR
Permit #73030535

Ink Emission Calculation

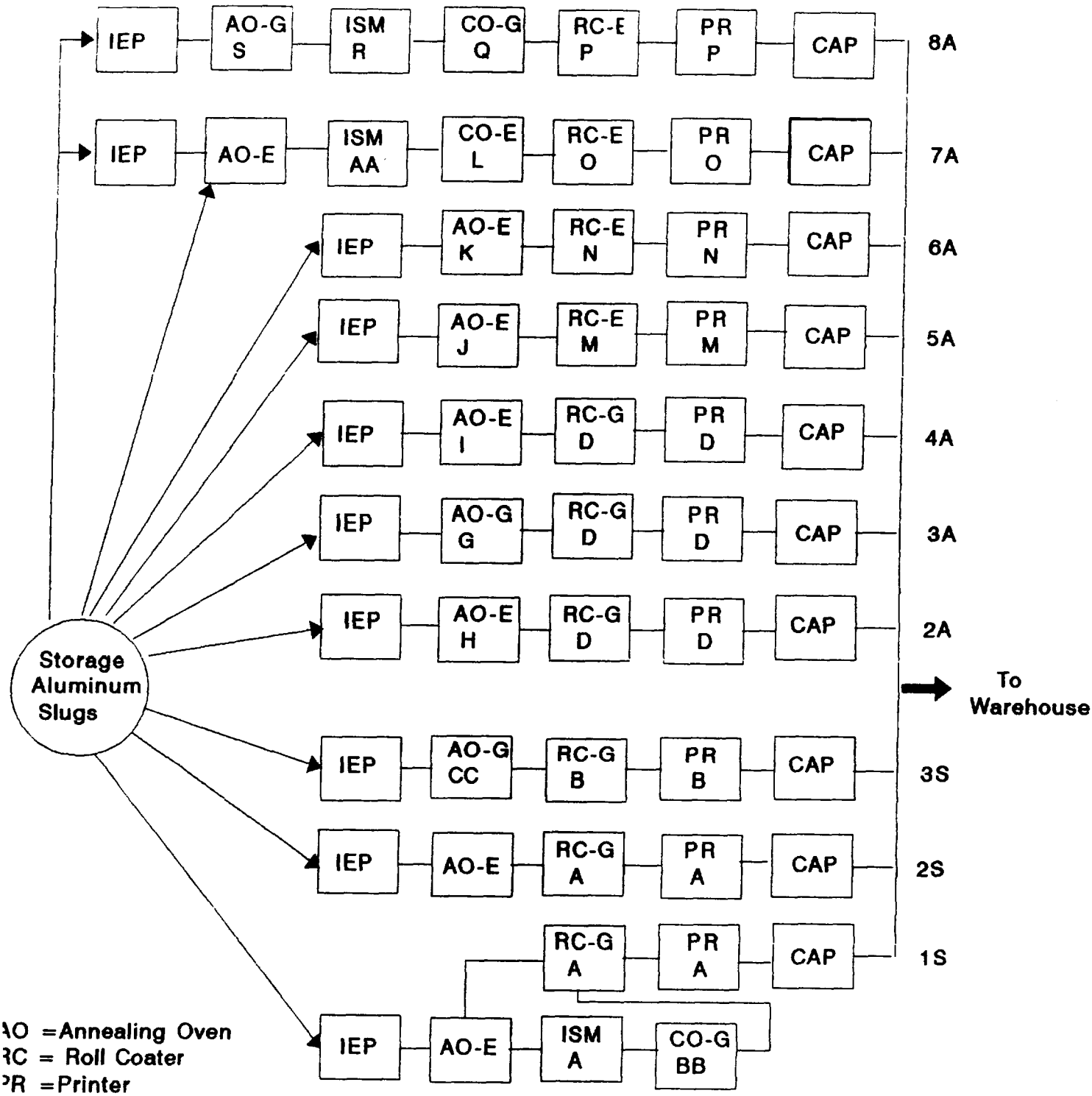
Total Ink Consumption	4039 lbs.
Maximum VOM Content 15%	606 lb. (0.30 Tons)

Facility Emissions Calculation - VOM (lbs/gal)

Contribution from Coating Operations	67410.12
Contribution from Printing Operations	606
Total Emissions	68016.12 (34.0 Tons)

J. L. Clark - Tube Division

Flow Diagram

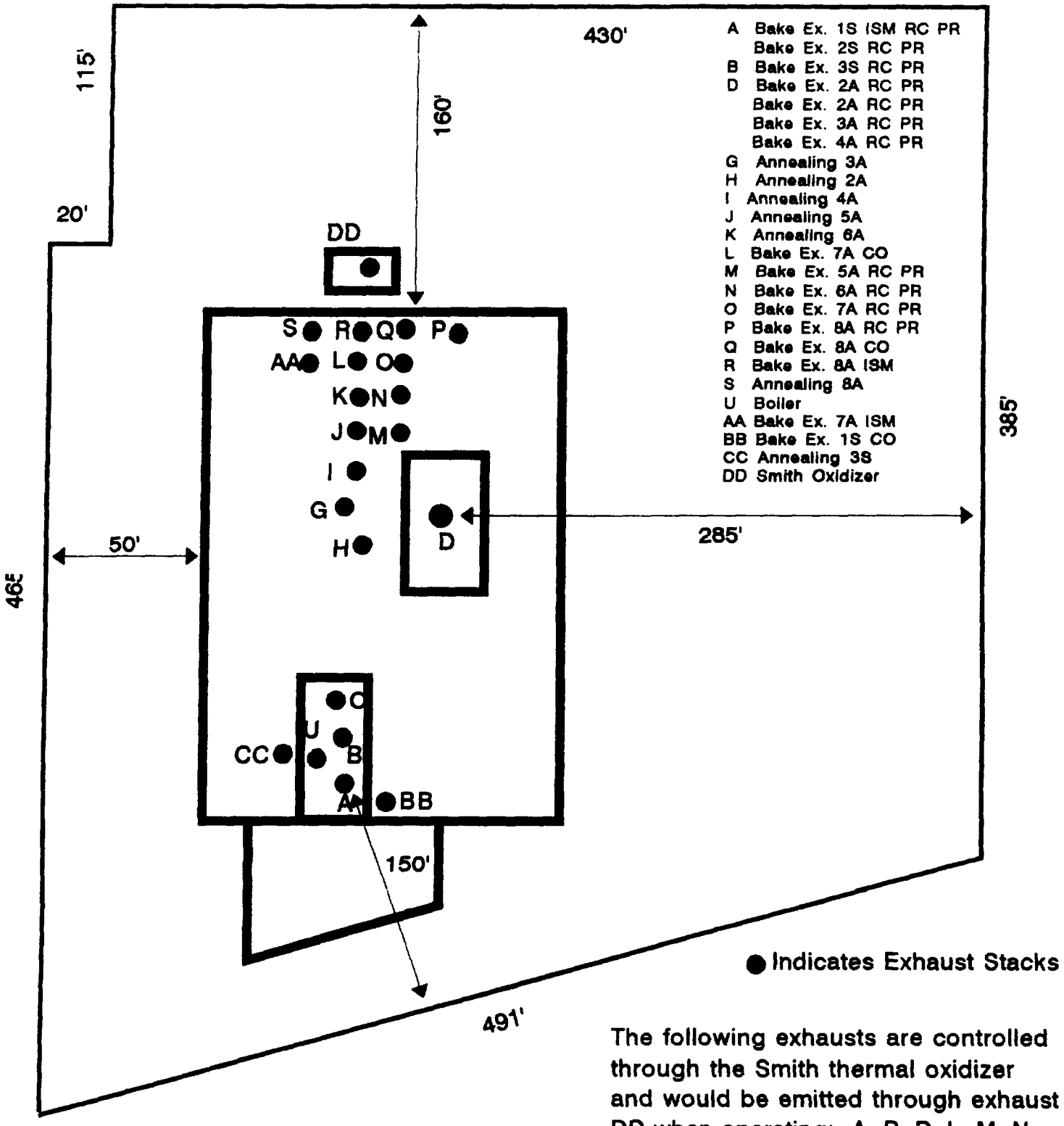


AO =Annealing Oven
RC = Roll Coater
PR =Printer
SM=Internal Spray Machine
EP=Impact Extrusion Press
CAP=Capping Operation
CO =Curing Oven
E =Elcetric
G =Gas

Letter under equipment code indicates emission source on plot plan. All emissions from ISM, CO, RC and PR are directed to the Smith thermal oxidizer.

J. L. Clark - Tube Division

Plot Plan



The following exhausts are controlled through the Smith thermal oxidizer and would be emitted through exhaust DD when operating: A, B, D, L, M, N, O, P, Q, R, AA and BB.

Total Property 4.4 Acres

State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217/782-5544

May 25, 1993

J.L. Clark Manufacturing Co.
Attn: James K. Klotz
2300 Sixth Street
Rockford, Illinois 61104

Re: COMPLIANCE INQUIRY LETTER

Dear Mr. Klotz:

This letter concerns noncompliance at J.L. clark, 2300 Wisconsin Avenue, Downers Grove with the requirements of the Illinois Environmental Protection Act (Ill. Rev. Stat. 1987, ch. 111½, pars. 1001 et seq) ("Act") and the Air Pollution Control Regulations codified at 35 Illinois Administrative Code Part 201. The violation is as follows:

Section 9 (b) of the Act and Section(s) 201.143--

Operating without the required Agency operating permit

Aluminum Tube Lines

35 Ill. Adm. Code Part 218

Failure to certify compliance with Part 218.

Under Illinois law, the penalty for such a violation is up to $50,000 plus $10,000 for each day of continuing violation. Your application 73030535 for a permit to operate the above named source(s) was denied December 10, 1992. A response sheet is enclosed for you to use in responding to this letter. Completion of this form by you will facilitate resolution of this violation. (This form should be returned to Mary Meyer in the Division of Legal Counsel.)

Please be advised that this letter constitutes notice required by Section 31(d) of the Act prior to filing of a formal complaint. The Agency hereby offers you the opportunity to meet with appropriate Agency representatives in an effort to resolve the conflicts which could lead to the filing of a formal complaint. Should you desire to have such a meeting, please contact Mary Meyer at 217/782-5544 within seven days form the date of this letter. This meeting, if it is requested, must be held within thirty (30) days of your receipt of this notice unless the Agency representative agrees to a postponement. If you do not request a meeting with the Agency, it will be assumed that you do not wish to meet.

Printed on Recycled Paper

The Agency will be proceeding forward on the assumption that the above mentioned sources are, and will remain, out of compliance until a permit is issued. A formal enforcement referral by the Agency to the Attorney General's office to obtain compliance and seek a penalty for these violation(s) will then follow.

Sincerely,

Miles Zamco, Manager
Field Operations
Division of Air Pollution Control

MZ:MS:MM:bjh/946v/59,60

Enclosures: Response Sheet

Illinois Environmental Protection Agency · P. O. Box 19276, Springfield, IL 62794-9276

217/782-2113

CERTIFIED MAIL
P 435 094 543

NOTICE OF INCOMPLETENESS

December 10, 1992

J.L. Clark Mfg. Co.
Attn: James K. Klotz
2300 Sixth Street
Rockford, IL 61104

Application No.:	73030535
I.D. No.:	043030AAR
Applicant's Designation:	3503
Received:	November 20, 1992
Operation of:	Aluminum Tube Lines
Location:	2300 Wisconsin Avenue, Downers Grove

The Agency has determined the above referenced operating permit application(s) to be incomplete because information was not provided as required by 35 Ill. Adm. Code 201.157.

Specifically, the following information must be supplied in order for the application to be considered complete:

DuPage County is now subject to 35 Ill. Adm. Code Section 218; previously J.L. Clark complied with 35 Ill. Adm. Code Section 215.

1. Please provide the method of compliance (a specific rule) for the coating operations, with detailed calculations.

2. Please provide the amount of coatings used and the VOM contents.

3. Please provide the amount of cleaning solvents used in pounds per year.

4. If an incinerator is used provide the capture efficiency, destruction efficiency and overall efficiency it is operated at.

5. Please provide the method of compliance (a specific rule) for the printing operations, with detailed calculations.

6. Please provide the type of printing you are doing, flexographic, rotogravure, heatset-web-offset, lithographic, etc.

7. Please provide the amount of ink used and the VOM contents.

8. Please provide the amount of any other solvents used in the printing operations in pounds per year.

If you have any questions on this, please call David Hulskotter at 217/782-2113.

Donald E. Sutton/pe

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:DWH:jmm/sp/620N/92-93

cc: Region 1
Mary Meyer

J.L. CLARK
member of the CLARCOR consumer products group

November 16, 1992

Mr. Donald E. Sutton
Manager, Permit Section
Division of Air Pollution Control
Illinois Environmental Protection Agency
P.O. Box 19276
Springfield, Illinois 62794-9276

- Certified -
P 406 114 831

Dear Mr. Sutton:

Enclosed please find a completed application for renewal of an air permit for J. L. Clark - Tube Division, 2300 Wisconsin Avenue, Downers Grove, Illinois 60515, I.D. #043030AAR, Permit #73030535.

The operation is unchanged since our last permit revision issued June 6, 1990. At that time we did not submit revised process flow diagrams and a plot plan for the facility. These are enclosed to update your files. We have corrected one annealing oven that was previously indicated to be electric which is actually gas fired. This will adjust our totals as follows:

10 annealing ovens (3 gas, 7 electric)
10 roller coaters, printers and curing ovens (6 gas, 4 electric)
3 curing ovens for internal coaters (2 gas, 1 electric)
3 internal tube lining machines
1 Smith thermal fume incinerator

These totals reflect the nomenclature change on the old "Hinterkopf" line to the designation of "3S". We would appreciate reflection of this change in the permit to show "3S" wherever Hinterkopf is indicated.

Should you have any further questions or should you require additional information, please contact me at (815)962-8861.

Sincerely,

James K. Klotz, CHMM
Environmental Engineer

/tkb

Enclosure

2300 Sixth Street, P.O. Box 7000
Rockford, Illinois 61125
815/962-8861
FAX: 815/962-6356

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62706

This agency is authorized to require this information under Illinois Revised Statutes, 1979, Chapter 111½, Section 1039. Disclosure of this information is required under that section. Failure to do so may prevent this form from being processed and could result in your application being denied. This form has been approved by the Forms Management Center.

APPLICATION FOR RENEWAL OF AN OPERATING PERMIT

OPERATION OF: Ten annealling ovens, roll coater & printers, three internal spray machines and Smith ~~fume incinerator~~ (A)
(SAME AS 9c ON PAGE 2)

FOR AGENCY USE ONLY

I. D. NO. _____

PERMIT NO. _____

DATE _____

1a. NAME OF OWNER: CLARCOR, Inc.		2a. NAME OF OPERATOR: J. L. Clark, Inc.	
1b. STREET ADDRESS OF OWNER: 2323 Sixth Street		2b. STREET ADDRESS OF OPERATOR: 2300 Sixth Street	
1c. CITY OF OWNER: Rockford		2c. CITY OF OPERATOR: Rockford	
1d. STATE OF OWNER: Il	1e. ZIP CODE: 61104	2d. STATE OF OPERATOR: IL	2e. ZIP CODE: 61104

3a. NAME OF CORPORATE DIVISION OR PLANT: J. L. Clark - Tube Division		3b. STREET ADDRESS OF EMISSION SOURCE: 2300 Wisconsin Avenue		
3c. CITY OF EMISSION SOURCE: Downers Grove	3d. LOCATED WITHIN CITY LIMITS: ☒ YES ☐ NO	3e. TOWNSHIP: Lisle	3f. COUNTY: DuPage	3g. ZIP CODE: 60515

4. ALL CORRESPONDENCE TO: (TITLE AND/OR NAME OF INDIVIDUAL) James K. Klotz/Environmental Engineer	5. TELEPHONE NUMBER FOR AGENCY TO CALL: 815/962-8861
6. ADDRESS FOR CORRESPONDENCE: ☐ OWNER ☒ OPERATOR ☐ EMISSION SOURCE	7. YOUR DESIGNATION FOR THIS APPLICATION: (B) 3 5 0 3 _ _ _ _ _

8. THE UNDERSIGNED HEREBY MAKES APPLICATION FOR A PERMIT AND CERTIFIES THAT THE STATEMENTS CONTAINED HEREIN ARE TRUE AND CORRECT, AND FURTHER CERTIFIES THAT ALL PREVIOUSLY SUBMITTED INFORMATION REFERENCED IN THIS APPLICATION REMAINS TRUE, CORRECT AND CURRENT. BY AFFIXING HIS SIGNATURE HERETO HE FURTHER CERTIFIES THAT HE IS AUTHORIZED TO EXECUTE THIS APPLICATION.

AUTHORIZED SIGNATURE(S): (C)

BY Gordon E. VerWeyst (SIGNATURE) 11/18/92 (DATE)	BY Ronald A Moreau (SIGNATURE) 11/18/92 (DATE)
Gordon E. VerWeyst (TYPED OR PRINTED NAME OF SIGNER)	Ronald A. Moreau (TYPED OR PRINTED NAME OF SIGNER)
Vice-President - Technology (TITLE OF SIGNER)	Group Vice President (TITLE OF SIGNER)

(A) THIS FORM IS TO PROVIDE THE AGENCY WITH GENERAL INFORMATION ABOUT THE EQUIPMENT TO BE OPERATED.

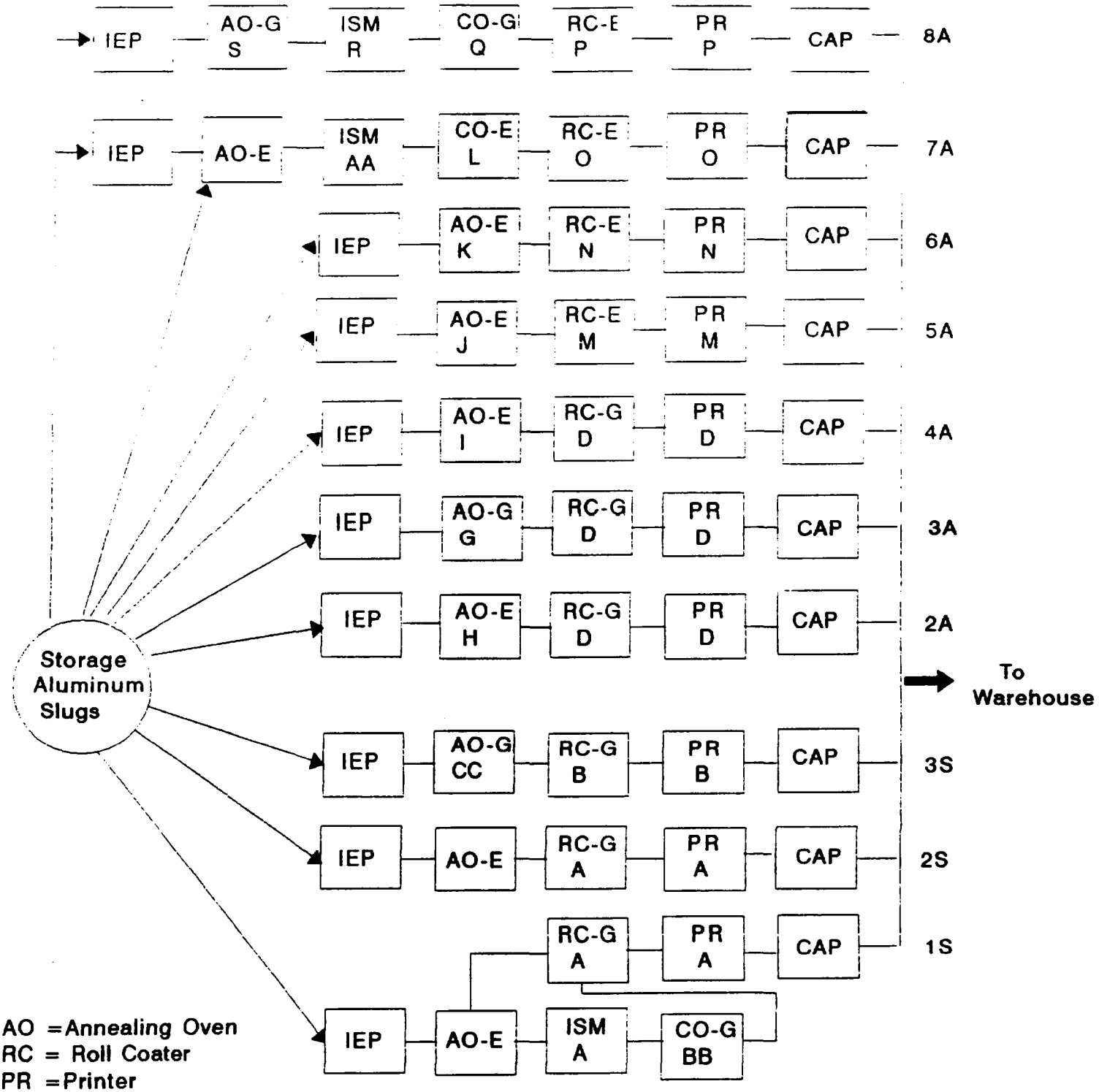
(B) PROVIDE A DESIGNATION IN ITEM 7 ABOVE WHICH YOU WOULD LIKE THE AGENCY TO USE FOR IDENTIFICATION OF YOUR EQUIPMENT. YOUR DESIGNATION WILL BE REFERENCED IN CORRESPONDENCE FROM THIS AGENCY RELATIVE TO THIS APPLICATION. YOUR DESIGNATION MUST NOT EXCEED TEN (10) CHARACTERS.

(C) THIS APPLICATION MUST BE SIGNED IN ACCORDANCE WITH 35 ILL. ADM. CODE 201.154 or 201.159 WHICH STATES: "ALL APPLICATIONS AND SUPPLEMENTS THERETO SHALL BE SIGNED BY THE OWNER AND OPERATOR OF THE EMISSION SOURCE OR AIR POLLUTION CONTROL EQUIPMENT, OR THEIR AUTHORIZED AGENT, AND SHALL BE ACCOMPANIED BY EVIDENCE OF AUTHORITY TO SIGN THE APPLICATION."

IF THE OWNER OR OPERATOR IS A CORPORATION, SUCH CORPORATION MUST HAVE ON FILE WITH THE AGENCY A CERTIFIED COPY OF A RESOLUTION OF THE CORPORATION'S BOARD OF DIRECTORS AUTHORIZING THE PERSONS SIGNING THIS APPLICATION TO CAUSE OR ALLOW THE CONTRUCTION OR OPERATION OF THE EQUIPMENT TO BE COVERED BY THE PERMIT.

J. L. Clark - Tube Division

Flow Diagram

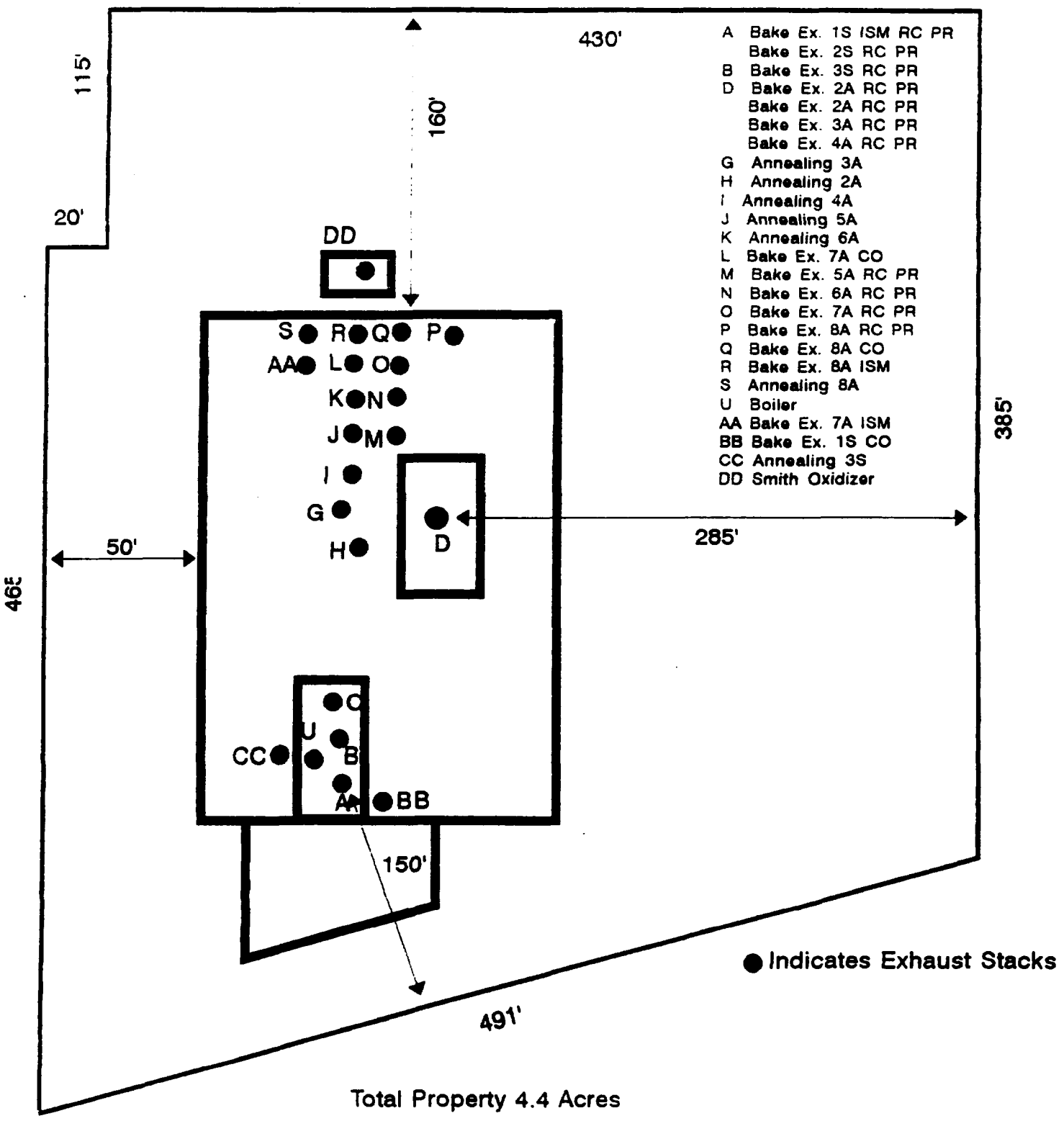


AO =Annealing Oven
RC = Roll Coater
PR =Printer
ISM=Internal Spray Machine
IEP=Impact Extrusion Press
CAP=Capping Operation
CO =Curing Oven
-E =Elcetric
-G =Gas

Letter under equipment code indicates emission source on plot plan.

J. L. Clark - Tube Division

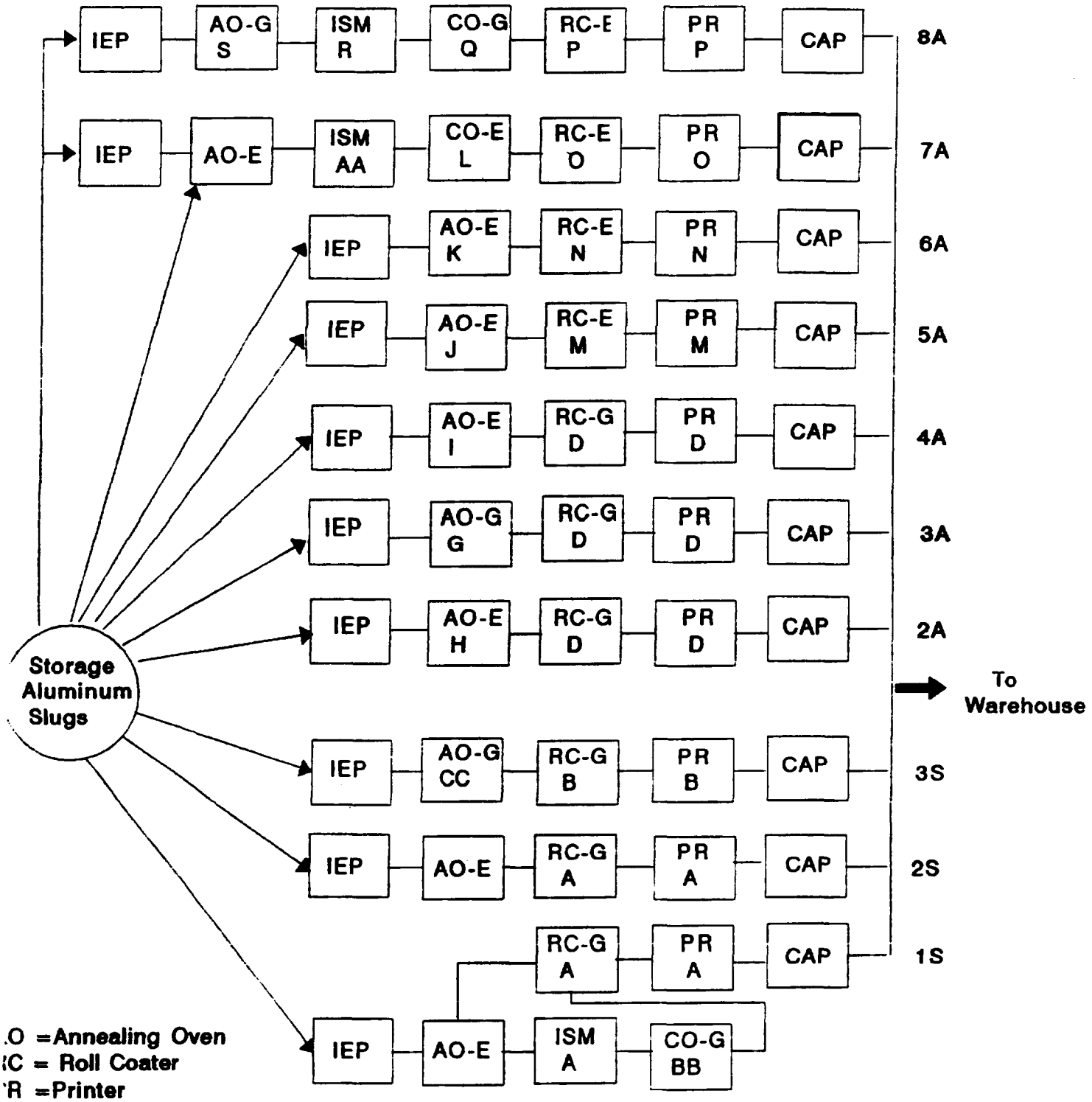
Plot Plan



Total Property 4.4 Acres

J. L. Clark - Tube Division

Flow Diagram

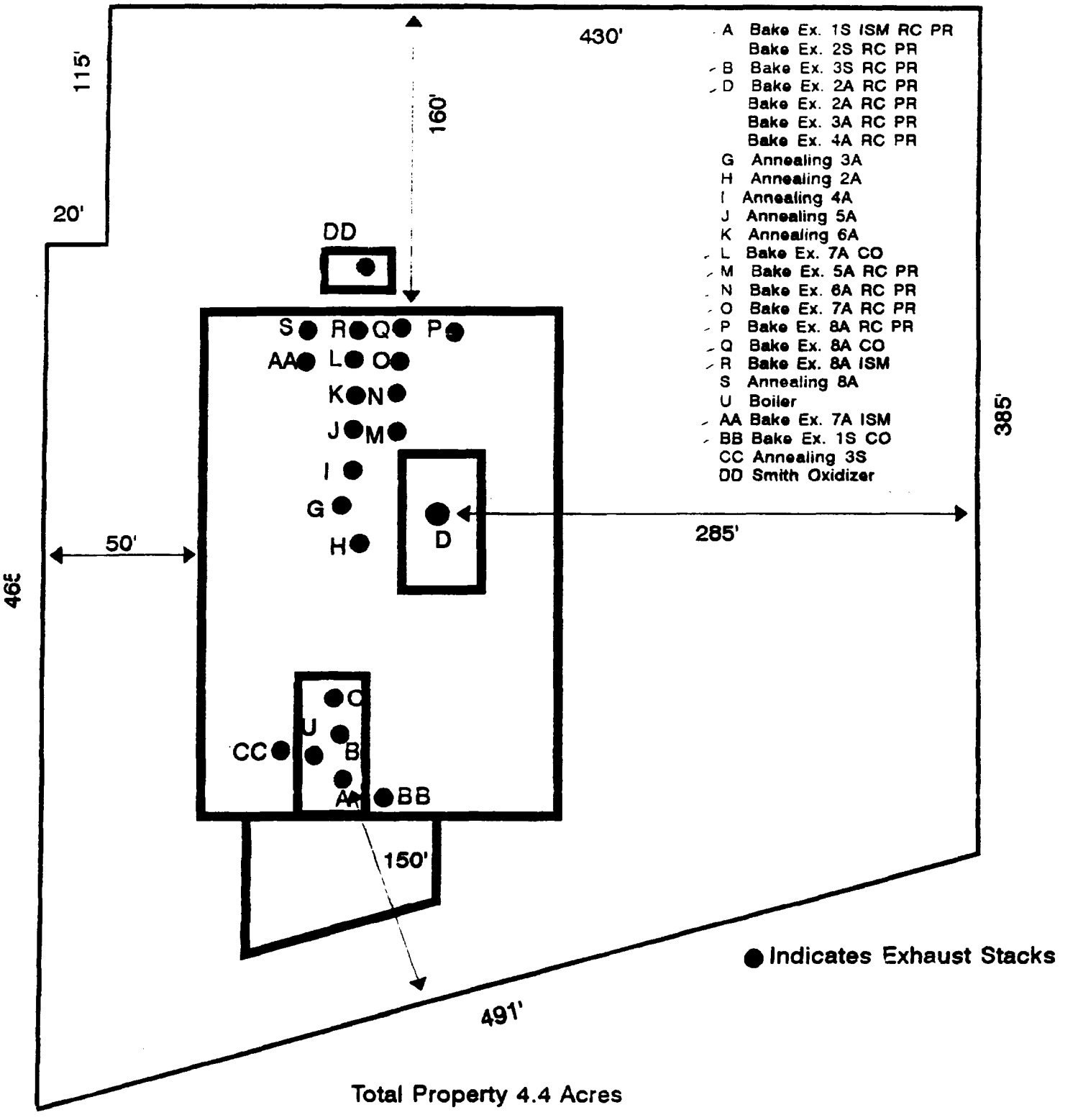


.O =Annealing Oven
:C = Roll Coater
'R =Printer
SM=Internal Spray Machine
EP=Impact Extrusion Press
:AP=Capping Operation
:O =Curing Oven
E =Elcetric
G =Gas

Letter under equipment code indicates emission source on plot plan.

J. L. Clark - Tube Division

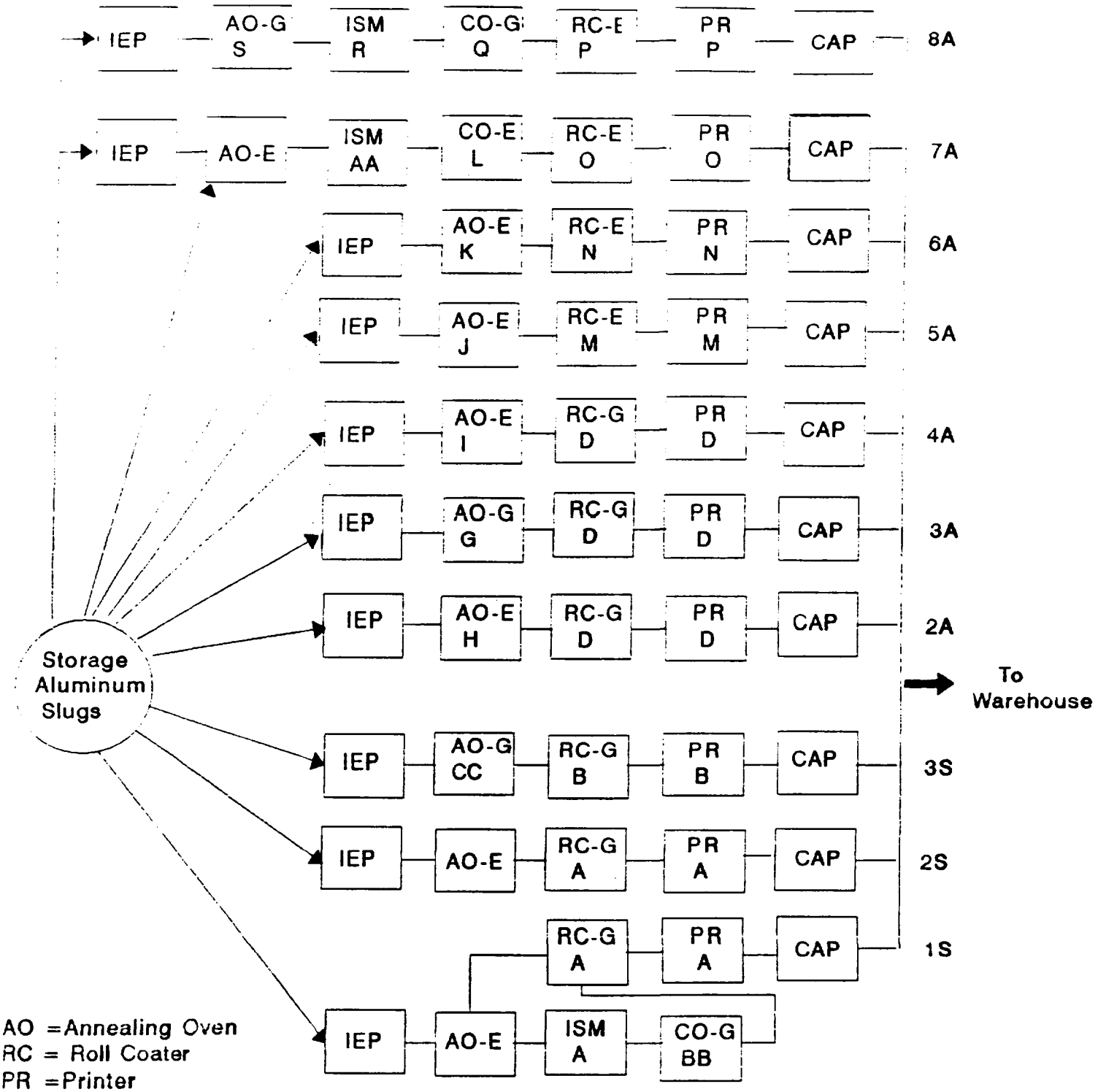
Plot Plan



Total Property 4.4 Acres

J. L. Clark - Tube Division

Flow Diagram



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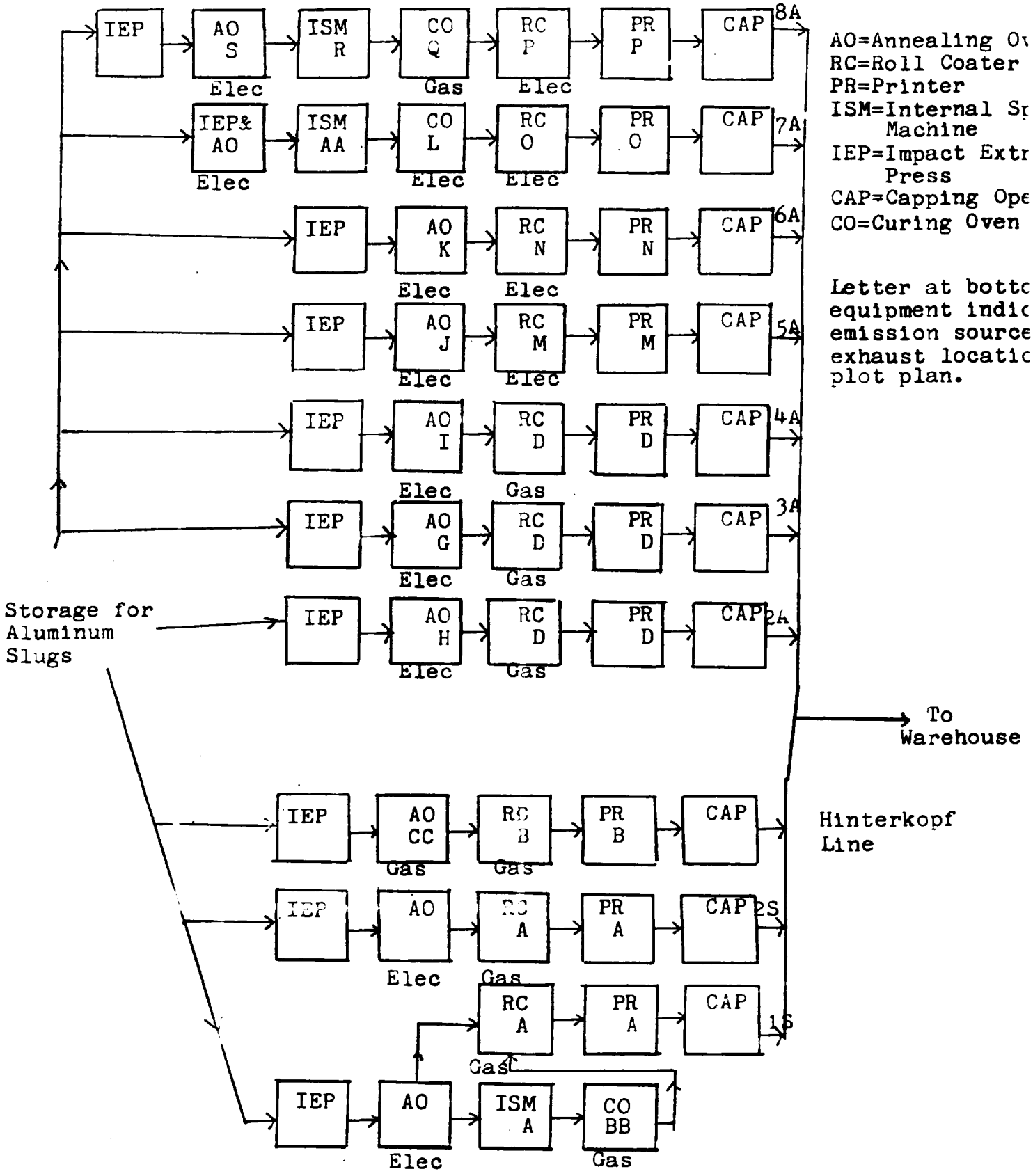
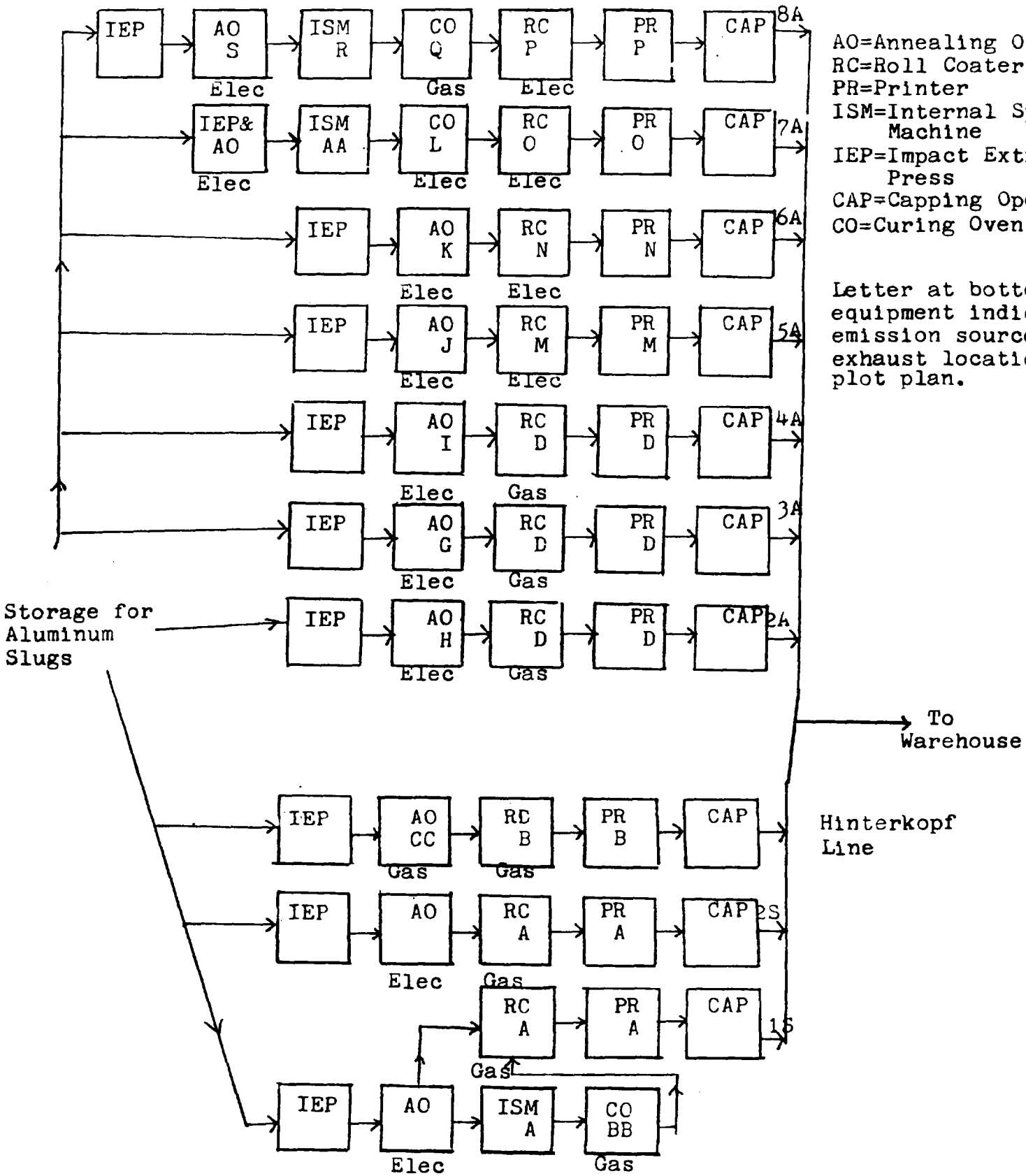
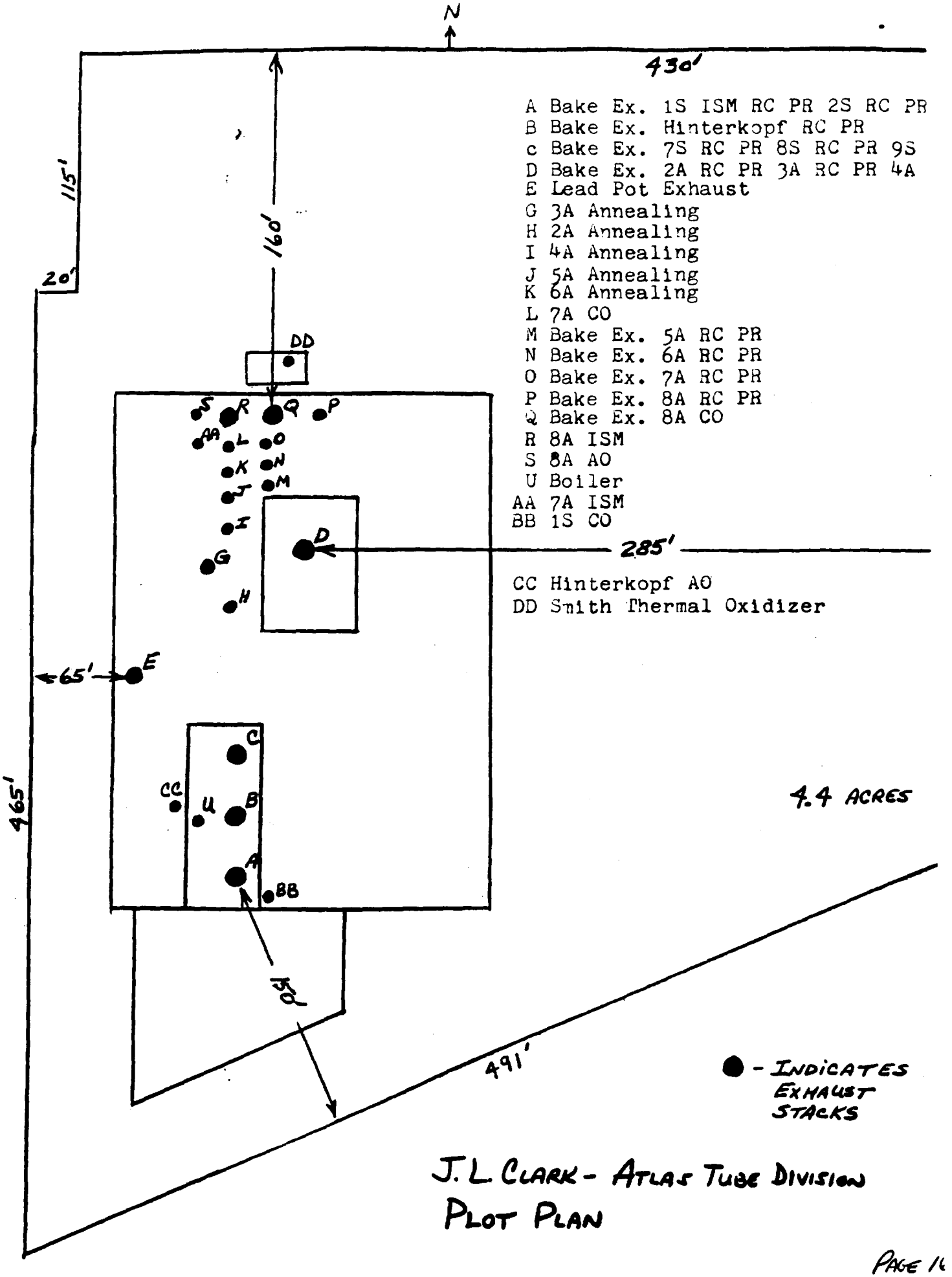
Letter under equipment code indicates emission source on plot plan.

J. L. CLARK - ATLAS TUBE DIVISION
FLOW DIAGRAM
ALUMINUM LINES



J. L. CLARK - ATLAS TUBE DIVISION
FLOW DIAGRAM
ALUMINUM LINES





A Bake Ex. 1S ISM RC PR 2S RC PR
B Bake Ex. Hinterkopf RC PR
c Bake Ex. 7S RC PR 8S RC PR 9S
D Bake Ex. 2A RC PR 3A RC PR 4A
E Lead Pot Exhaust
G 3A Annealing
H 2A Annealing
I 4A Annealing
J 5A Annealing
K 6A Annealing
L 7A CO
M Bake Ex. 5A RC PR
N Bake Ex. 6A RC PR
O Bake Ex. 7A RC PR
P Bake Ex. 8A RC PR
Q Bake Ex. 8A CO
R 8A ISM
S 8A AO
U Boiler
AA 7A ISM
BB 1S CO
CC Hinterkopf AO
DD Smith Thermal Oxidizer

J. L. CLARK - ATLAS TUBE DIVISION
PLOT PLAN

Illinois Environmental Protection Agency • P.O. Box 19276, Springfield, IL 62794-9276

APPLICATION FOR PERMIT RENEWAL/OPERATING PERMIT

APRIL 01, 1992 217/782-2113

APPLICATION NO: 73030535
ID NUMBER: 043030AAR 3499
OPERATION OF:
ALUMINUM TUBE LINES

J L CLARK MANUFACTURING CO
ATTN: JAMES K. KLOTZ CHEIF CHEMIST
2300 6TH ST
ROCKFORD IL 61101

LOCATION:
J L CLARK MFG CO - ATLAS TUBE DIV
2300 WISCONSIN AVE
DOWNERS GROVE IL 60515

THE ABOVE REFERENCED OPERATING PERMIT WILL EXPIRE ON SEPTEMBER 30, 1992. THE AGENCY RECOMMENDS THAT YOU APPLY FOR A RENEWAL OF THIS OPERATING PERMIT AT LEAST NINETY (90) DAYS PRIOR TO ITS EXPIRATION.

IF YOUR OPERATION IS UNCHANGED, YOU MAY REQUEST TO RENEW YOUR PERMIT BY SIGNING IN THE SPACE PROVIDED BELOW, KEEPING ONE COPY FOR YOUR RECORDS, AND RETURNING THIS CORRESPONDENCE TO THE AGENCY. IF DATED AND SIGNED BY THE AGENCY THIS APPLICATION WILL BE RETURNED TO YOU AND WILL BE YOUR PERMIT.

IF THERE HAS BEEN A CHANGE OF ADDRESS, PLEASE INDICATE THIS BY CORRECTING THE ABOVE INFORMATION. IF THERE HAS BEEN A CHANGE OF OWNERSHIP, PROPER DOCUMENTATION MUST BE SUBMITTED TO ALLOW TRANSFER OF PERMIT(S). IF YOUR OPERATION HAS CHANGED FROM THAT DESCRIBED IN THE APPLICATION FILED WITH THIS AGENCY, THEN YOU MUST USE APPROPRIATE FORMS TO DESCRIBE ALL CHANGES AS PART OF THE APPLICATION. (SEE ENCLOSED "REQUEST FOR PERMIT FORMS": APC 209).

IF THE OPERATION HAS BEEN PERMANENTLY DISCONTINUED, PLEASE SEND A LETTER TO THE AGENCY WITHDRAWING THIS PERMIT. IF THE OPERATION HAS BEEN INCLUDED IN ANOTHER PERMIT, PLEASE PROVIDE THE PERMIT NUMBER OF THE NEW PERMIT(S) AND A LETTER OF EXPLANATION.

I CERTIFY THAT THE ORIGINAL PERMIT INFORMATION REMAINS TRUE, CORRECT, AND CURRENT AND THAT I AM AUTHORIZED TO EXECUTE THIS APPLICATION FOR PERMIT RENEWAL.

SIGNATURE DATE PRINTED NAME AND TITLE OF SIGNER

FOR AGENCY USE ONLY

PERMIT EXPIRATION DATE:

PERMIT IS GRANTED TO OPERATE THE ABOVE REFERENCED EQUIPMENT SUBJECT TO STANDARD CONDITIONS ATTACHED HERETO AND ANY SPECIAL CONDITIONS OF THE PREVIOUSLY GRANTED OPERATING PERMIT.

DONALD E. SUTTON, P.E.
MANAGER, PERMIT SECTION
DIVISION OF AIR POLLUTION CONTROL

CC: REGION 110

Illinois Environmental Protection Agency • P.O. Box 19276, Springfield, IL 62794-9276

APPLICATION FOR PERMIT RENEWAL/OPERATING PERMIT

APRIL 21, 1992 217/782-21.

APPLICATION NO: 73030535
ID NUMBER: 04303CAAR 3499
OPERATION OF:
ALUMINUM TUBE LINES

J L CLARK MANUFACTURING CO
ATTN: JAMES K. KLOTZ CHEIF CHEMIST
2300 6TH ST
ROCKFORD IL 61101

LOCATION:
J L CLARK MFG CO - ATLAS TUBE DIV
2300 WISCONSIN AVE
DOWNERS GROVE IL 60515

THE ABOVE REFERENCED OPERATING PERMIT WILL EXPIRE ON SEPTEMBER 30, 1992. THE AGENCY RECOMMENDS THAT YOU APPLY FOR A RENEWAL OF THIS OPERATING PERMIT AT LEAST NINETY (90) DAYS PRIOR TO ITS EXPIRATION.

IF YOUR OPERATION IS UNCHANGED, YOU MAY REQUEST TO RENEW YOUR PERMIT BY SIGNING IN THE SPACE PROVIDED BELOW, KEEPING ONE COPY FOR YOUR RECORDS, AN RETURNING THIS CORRESPONDENCE TO THE AGENCY. IF DATED AND SIGNED BY THE AGENCY THIS APPLICATION WILL BE RETURNED TO YOU AND WILL BE YOUR PERMIT.

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IF THE OPERATION HAS BEEN PERMANENTLY DISCONTINUED, PLEASE SEND A LETTER TO THE AGENCY WITHDRAWING THIS PERMIT. IF THE OPERATION HAS BEEN INCLUDED IN ANOTHER PERMIT, PLEASE PROVIDE THE PERMIT NUMBER OF THE NEW PERMIT(S) AND A LETTER OF EXPLANATION.

I CERTIFY THAT THE ORIGINAL PERMIT INFORMATION REMAINS TRUE, CORRECT, AND CURRENT AND THAT I AM AUTHORIZED TO EXECUTE THIS APPLICATION FOR PERMIT RENEWAL.

SIGNATURE	DATE	PRINTED NAME AND TITLE OF SIGNER

FOR AGENCY USE ONLY

PERMIT EXPIRATION DATE:

PERMIT IS GRANTED TO OPERATE THE ABOVE REFERENCED EQUIPMENT SUBJECT TO STANDARD CONDITIONS ATTACHED HERETO AND ANY SPECIAL CONDITIONS OF THE PREVIOUSLY GRANTED OPERATING PERMIT.

DONALD E. SUTTON, P.E.
MANAGER, PERMIT SECTION
DIVISION OF AIR POLLUTION CONTROL

C: REGION 1

Illinois Environmental Protection Agency • P.O. Box 19276, Springfield, IL 62794-9276

APPLICATION FOR PERMIT RENEWAL/OPERATING PERMIT

APRIL 1, 1992 217/782-21.

APPLICATION NO: 73036535
ID NUMBER: 043030AAR 3499
OPERATION OF:
ALUMINUM TUBE LINES

J L CLARK MANUFACTURING CO
ATTN: JAMES K. KLOTZ CHEIF CHEMIST
230 6TH ST
ROCKFORD IL 61101

LOCATION:
J L CLARK MFG CO - ATLAS TUBE DIV
2300 WISCONSIN AVE
DOWNERS GROVE IL 60515

THE ABOVE REFERENCED OPERATING PERMIT WILL EXPIRE ON SEPTEMBER 30, 1992. THE AGENCY RECOMMENDS THAT YOU APPLY FOR A RENEWAL OF THIS OPERATING PERMIT AT LEAST NINETY (90) DAYS PRIOR TO ITS EXPIRATION.

IF YOUR OPERATION IS UNCHANGED, YOU MAY REQUEST TO RENEW YOUR PERMIT BY SIGNING IN THE SPACE PROVIDED BELOW, KEEPING ONE COPY FOR YOUR RECORDS, AND RETURNING THIS CORRESPONDENCE TO THE AGENCY. IF DATED AND SIGNED BY THE AGENCY THIS APPLICATION WILL BE RETURNED TO YOU AND WILL BE YOUR PERMIT.

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IF THE OPERATION HAS BEEN PERMANENTLY DISCONTINUED, PLEASE SEND A LETTER TO THE AGENCY WITHDRAWING THIS PERMIT. IF THE OPERATION HAS BEEN INCLUDED IN ANOTHER PERMIT, PLEASE PROVIDE THE PERMIT NUMBER OF THE NEW PERMIT(S) AND A LETTER OF EXPLANATION.

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SIGNATURE	DATE	PRINTED NAME AND TITLE OF SIGNER

FOR AGENCY USE ONLY

PERMIT EXPIRATION DATE:

PERMIT IS GRANTED TO OPERATE THE ABOVE REFERENCED EQUIPMENT SUBJECT TO STANDARD CONDITIONS ATTACHED HERETO AND ANY SPECIAL CONDITIONS OF THE PREVIOUSLY GRANTED OPERATING PERMIT.

DONALD E. SUTTON, P.E.
MANAGER, PERMIT SECTION
DIVISION OF AIR POLLUTION CONTROL

CC: REGION 1

Illinois Environmental Protection Agency • P.O. Box 19276, Springfield, IL 62794-9276

APPLICATION FOR PERMIT RENEWAL/OPERATING PERMIT

[illegible] 1, 1992 217/[illegible]

APPLICATION NO: 73030535
ID NUMBER: 04303CAAP 3499
OPERATION OF:
ALUMINUM TUBE LINES

J L CLARK MANUFACTURING CO
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[illegible] 6TH ST
ROCKFORD IL 61101

LOCATION:
J L CLARK MFG CO - ATLAS TUBE DIV
2300 WISCONSIN AVE
DOWNERS GROVE IL 60515

THE ABOVE REFERENCED OPERATING PERMIT WILL EXPIRE ON SEPTEMBER 30, 1992. THE AGENCY RECOMMENDS THAT YOU APPLY FOR A RENEWAL OF THIS OPERATING PERMIT AT LEAST NINETY (90) DAYS PRIOR TO ITS EXPIRATION.

IF YOUR OPERATION IS UNCHANGED, YOU MAY REQUEST TO RENEW YOUR PERMIT BY SIGNING IN THE SPACE PROVIDED BELOW, KEEPING ONE COPY FOR YOUR RECORDS, AND RETURNING THIS CORRESPONDENCE TO THE AGENCY. IF DATED AND SIGNED BY THE AGENCY THIS APPLICATION WILL BE RETURNED TO YOU AND WILL BE YOUR PERMIT.

IF THERE HAS BEEN A CHANGE OF ADDRESS, PLEASE INDICATE THIS BY CORRECTING THE ABOVE INFORMATION. IF THERE HAS BEEN A CHANGE OF OWNERSHIP, PROPER DOCUMENTATION MUST BE SUBMITTED TO ALLOW TRANSFER OF PERMIT(S). IF YOUR OPERATION HAS CHANGED FROM THAT DESCRIBED IN THE APPLICATION FILED WITH THIS AGENCY, THEN YOU MUST USE APPROPRIATE FORMS TO DESCRIBE ALL CHANGES AS PART OF THE APPLICATION. (SEE ENCLOSED 'REQUEST FOR PERMIT FORMS' APC-209).

IF THE OPERATION HAS BEEN PERMANENTLY DISCONTINUED, PLEASE SEND A LETTER TO THE AGENCY WITHDRAWING THIS PERMIT. IF THE OPERATION HAS BEEN INCLUDED IN ANOTHER PERMIT, PLEASE PROVIDE THE PERMIT NUMBER OF THE NEW PERMIT(S) AND A LETTER OF EXPLANATION.

I CERTIFY THAT THE ORIGINAL PERMIT INFORMATION REMAINS TRUE, CORRECT, AND CURRENT AND THAT I AM AUTHORIZED TO EXECUTE THIS APPLICATION FOR PERMIT RENEWAL.

SIGNATURE	DATE	PRINTED NAME AND TITLE OF SIGNER

FOR AGENCY USE ONLY

PERMIT EXPIRATION DATE:

PERMIT IS GRANTED TO OPERATE THE ABOVE REFERENCED EQUIPMENT SUBJECT TO STANDARD CONDITIONS ATTACHED HERETO AND ANY SPECIAL CONDITIONS OF THE PREVIOUSLY GRANTED OPERATING PERMIT.

GERALD P. SUTTON, P.E.
MANAGER, PERMIT SECTION
[illegible]

Illinois Environmental Protection Agency • P.O. Box 19276, Springfield, IL 62794-9276

[illegible]

[illegible]

[illegible]

[illegible]

THE ABOVE REFERENCED OPERATING PERMIT WILL EXPIRE ON [illegible]. THE AGENCY RECOMMENDS THAT YOU APPLY FOR A RENEWAL OF THIS OPERATING PERMIT AT LEAST NINETY (90) DAYS PRIOR TO ITS EXPIRATION.

IF YOUR OPERATION IS UNCHANGED, YOU MAY REQUEST TO RENEW YOUR PERMIT BY SIGNING IN THE SPACE PROVIDED BELOW, KEEPING ONE COPY FOR YOUR RECORDS, AND RETURNING THIS CORRESPONDENCE TO THE AGENCY. IF DATED AND SIGNED BY THE AGENCY THIS APPLICATION WILL BE RETURNED TO YOU AND WILL BE YOUR PERMIT.

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IF THE OPERATION HAS BEEN PERMANENTLY DISCONTINUED, PLEASE SEND A LETTER TO THE AGENCY WITHDRAWING THIS PERMIT. IF THE OPERATION HAS BEEN INCLUDED IN ANOTHER PERMIT, PLEASE PROVIDE THE PERMIT NUMBER OF THE NEW PERMIT(S) AND A LETTER OF EXPLANATION.

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SIGNATURE	DATE	PRINTED NAME AND TITLE OF SIGNER

FOR AGENCY USE ONLY

PERMIT EXPIRATION DATE:

PERMIT IS GRANTED TO OPERATE THE [illegible] EQUIPMENT [illegible] SPECIAL CONDITIONS OF THE [illegible] PERMIT.

[illegible]

J.L.CLARK
a member of the CLARCOR consumer products group

Date: April 7, 1992

To: John Benton*/Gordon VerWeyst

By: Jim Klotz

Copies To:

Reference: J. L. Clark - Tube Division

Subject: Air Permit Renewal

F162

Attached is a copy of a renewal notice we recently received for the Tube Division Air Permit.

We will schedule an audit visit to assure that the permit parameters and conditions are still valid before filing for renewal. If we have any operations changes planned, this is a good opportunity to obtain a revised permit.

We will need to submit our renewal application no later than May 30, 1992 to assure uninterrupted operations. We will establish a permit review date before May 1, 1992.

/tkb

Attach.

*Fax'd. 4/7/92

Illinois Environmental Protection Agency • P.O. Box 19276, Springfield, IL 62794-9276

APPLICATION FOR PERMIT RENEWAL/OPERATING PERMIT

APRIL 01, 1992 217/782-2113

APPLICATION NO: 73030535
ID NUMBER: 043030AAR 3499
OPERATION OF:
ALUMINUM TUBE LINES

J L CLARK MANUFACTURING CO
ATTN: JAMES K. KLOTZ CHEIF CHEMIST
2300 6TH ST
ROCKFORD IL 61101

LOCATION:
J L CLARK MFG CO - ATLAS TUBE DIV
2300 WISCONSIN AVE
DOWNERS GROVE IL 60515

THE ABOVE REFERENCED OPERATING PERMIT WILL EXPIRE ON SEPTEMBER 30, 1992. THE AGENCY RECOMMENDS THAT YOU APPLY FOR A RENEWAL OF THIS OPERATING PERMIT AT LEAST NINETY (90) DAYS PRIOR TO ITS EXPIRATION.

IF YOUR OPERATION IS UNCHANGED, YOU MAY REQUEST TO RENEW YOUR PERMIT BY SIGNING IN THE SPACE PROVIDED BELOW, KEEPING ONE COPY FOR YOUR RECORDS, AI RETURNING THIS CORRESPONDENCE TO THE AGENCY. IF DATED AND SIGNED BY THE AGENCY THIS APPLICATION WILL BE RETURNED TO YOU AND WILL BE YOUR PERMIT.

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I CERTIFY THAT THE ORIGINAL PERMIT INFORMATION REMAINS TRUE, CORRECT, AND CURRENT AND THAT I AM AUTHORIZED TO EXECUTE THIS APPLICATION FOR PERMIT RENEWAL.

SIGNATURE	DATE	PRINTED NAME AND TITLE OF SIGNER

FOR AGENCY USE ONLY

PERMIT EXPIRATION DATE:

PERMIT IS GRANTED TO OPERATE THE ABOVE REFERENCED EQUIPMENT SUBJECT TO STANDARD CONDITIONS ATTACHED HERETO AND ANY SPECIAL CONDITIONS OF THE PREVIOUSLY GRANTED OPERATING PERMIT.

DONALD E. SUTTON, P.E.
MANAGER, PERMIT SECTION
DIVISION OF AIR POLLUTION CONTROL

CC: REGION 110

1992

JoAnn
Insert this table on to the attached page

J. L. Clark-Tube Division
Operating Permit Renewal

ID #043030AAR
Permit #73030535

Coating Designation — VOM content as applied — Coating Density — Usage

COATING & SOLVENT CALCULATION DETAIL

Material	VOM (lb/gal)	Wt/Gal	Consumed Winter	VOM	Consumed Summer	VOM	75% Control VOM	81% Control VOM	Consume Total	TOTAL UNCONTR VOM	TOTAL VOM
~~Coatings~~ Point			All other 0002+0012								
H-23 Gold Lining 0006	6.16	7.51	685	4219.6	744	4583.04	1145.76	870.78	1429	8802.64	5365.36
3164 Clear Coating	6.29	8.05	0	0	25	157.25	39.31	29.88	25	157.25	39.31
3817 Peel Coating	6.70	9.57	22	147.4	24	160.8	40.20	30.55	46	308.20	187.60
VY8M82026 Yellow	7.36	11.69	47	345.92	31	228.16	57.04	43.35	78	574.08	402.96
XR 1215 Lining 0006	6.90	8.07	31	213.9	14	96.6	24.15	18.35	45	310.50	238.05
10-084A Lining 0006	5.51	7.49	415	2286.65	470	2589.7	647.43	492.04	885	4876.35	2934.08
G72-WC-18 White	7.29	11.56	2041	14878.89	2481	18086.49	4521.62	3436.43	4522	32965.38	19400.51
379W67 White	4.52	12.49	440	1988.8	1894	8560.88	2140.22	1626.57	2334	10549.68	4129.02
IT-404-077 Lining 0006	5.41	8.2	110	595.1	105	568.05	142.01	107.93	215	1163.15	737.11
SUBTOTAL				24676.26		35030.97	8757.743	6655.884		59707.23	33434.00
~~Cleaning Solvent~~											
660 Solvent 0006i	7.02	7.02	1300	9126	1477	10368.54			2777	19494.54	19494.54
~~Thinners~~											
MEK 0006i	6.07	6.07	2552	15490.64	2984	18112.88	4528.22	3441.45	5536	33603.52	20018.86
Mineral Spirits	6.49	6.49	20	129.8	28	181.72	45.43	34.53	48	311.52	175.23
Glycol Ether DB	8.15	8.15	128	1043.2	578	4710.7	1177.68	895.03	706	5753.90	2220.88
Glycol Ether EB	7.84	7.84	85	666.4	314	2461.76	615.44	467.73	399	3128.16	1281.84
2300 Vinyl	7.62	7.62	73	556.26	132	1005.84	251.46	191.11	205	1562.10	807.72
SUBTOTAL				27012.3		36841.44	6618.225	5029.851		63853.74	43999.07
Less Solvent Disposed	7.02	7.02							924	6486.48	6486.48
TOTAL UNCONTROLLED VOM										117074.5	70946.59

3.2

Ink Total = 609#

J.L.CLARK

CLARCOR

Date: June 12, 1990

To: Dick Anderson/Gordon VerWeyst

By: Jim Klotz

Copies To: Greg Gann/Bill Pruyne

Reference: J. L. Clark - Atlas Tube

Subject: IEPA Air Permit

F162

Attached is a copy of the revised air permit which reflects the removal of the lead tube lines and the remelt furnace.

Unfortunately, the Agency will not grant us emission credit based upon our previous permit application. If we can obtain production data on the lead lines for the last two years (either hours of operations and/or tube production), we can calculate the actual line emissions and then re-apply for credit. This would allow us to "bank" 90% of the actual emissions for use at Atlas or Rockford within the next five years. Please advise if we should pursue the banking operation.

/tkb

Attach.

Illinois Environmental Protection Agency · P. O. Box 19276, Springfield, IL 62794-9276

217/782-2113

OPERATING PERMIT

PERMITTEE

J.L. Clark
Attn: James K. Klotz, Chief Chemist
2300 Sixth Street
Rockford, IL 61104

Application No.: 73030535
I.D. No.: 043030AAR
Applicant's Designation:
Date Received: May 3, 1990
Subject: Aluminum Tube Lines
Date Issued: June 6, 1990
Expiration Date: September 30, 1992
Location: 2300 Wisconsin Avenue, Downers Grove

Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of a new Hinterkopf line consisting of an extrusion press, an annealing oven, a roller coater & printer and a curing oven, 9 existing annealing ovens (8 electric & 1 gas), 9 existing roller coaters for aluminum lines, 9 existing printers, 9 curing ovens for printers, and coaters (4 electric and 5 gas) 3 internal tube lining machines, 3 curing ovens for internal coaters, 3 existing roller coaters for lead lines, and a fume incinerator as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1. Emissions of nitrogen oxides from the annealing oven and the curing oven of the Hinterkopf line shall not exceed 0.3 ton per year. This limit is based on maximum heat input rate, 6000 hours of operation per year and the standard emission factors for natural gas combustion.

2. Emission of organic materials from the Hinterkopf line shall not exceed 2.5 ton per year. This limit is based on maximum uncontrolled emissions of 4.0 tons/year, 75 percent overall control efficiency of the fume incinerator and the capture system and allowance provided in the condition #9 of this permit.

3. The Permittee shall maintain the fume incinerator combustion chamber temperature at the manufacturer's recommended level but not lower than 1400°F.

4a. This permit authorizes operation of coating lines other than the new Hinterkopf line based on an ongoing demonstration of compliance with Section 215.207, "Aggregation of Emission Sources," in that the Agency has approved the methods or procedures to be used to determine emissions pursuant to this Section. Pursuant to this Section, on each day the actual emissions of volatile organic material (VOM) shall be less than the allowable emissions, as determined for that day. The methods or procedures used to determine emissions of volatile organic material shall be in accordance with any procedures described in the application and the conditions of this permit.

b. The Permittee shall calculate daily allowable emissions by taking the product of the actual volume of solids in the coating for the day, in accordance with Section 215.207(b) and the applicable emission limit of Section 215.204(b) converted to pound of VOM/gallon coating solids, using the density of the solvent in the coating, and the actual volume of solids in the coating for the day.

c. The Permittee shall calculate actual emissions for a coating line assuming the overall 95% destruction of VOM represented in the application, for the combination of the capture system and afterburner, only if they are operated as described in the permit application, with a minimum afterburner temperature of 1400 degrees Fahrenheit. The afterburner combustion chamber shall be heated to this temperature before beginning operation of a coating line controlled by the afterburner.

5. The afterburner shall be equipped with a continuous temperature indicator and an alarm system which shall activate a horn located in the production area if the temperature drops below 1400°F.

6a. The Permittee shall maintain daily compliance records for the existing coating lines if operating pursuant to Section 215.207, including:

i) for each coating line, the name and volume of each coating used (gallon), the VOM content (pound/gallon), the solids content (volume %), the actual VOM emissions (pound) and the allowable VOM emissions (pound). All the above shall exclude any water or exempt compounds in the coating.

ii) the operating temperature of the afterburner(s) (Fahrenheit) recorded once every 4 hours when the indicating temperature is above 1400°F and recorded every 5 minutes when the temperature falls below 1400°F.

iii) the aggregate actual and allowable emissions (pounds/day).

b. The Permittee shall maintain monthly records for the Hinterkopf line and the existing lines including:

i) the coatings used on the line
ii) the VOM emissions

c. These records shall be retained for a period of two years and shall be available to the Agency for inspection.

7a. An annual report shall be sent to the Agency summarizing VOM emissions and compliance with Section 215.207 including:

i) For lines operating pursuant to Section 215.207:

A) total VOM emissions (pound)
B) average daily actual and allowable VOM emissions (pounds/operating day).

C) sample compliance calculations for one actual day
D) days in which the actual emissions exceeded the allowable with date, actual and allowable emissions, cause of exceedance, and corrective action, if any.

ii) For the new Hinterkopf line and existing lines the annual VOM emissions with supporting calculations.

b. These reports shall be sent beginning January 1, 1989 no later than 20 days after the end of the reporting period to the Permit Section and:

Illinois Environmental Protection Agency
Division of Air Pollution Control
The Intercontinental Center
1701 First Avenue
Maywood, IL 60153

8. Operation of the coating & printing lines is not permitted during malfunction and breakdown of the fume incinerator because compliance with 35 Ill. Adm. Code 201.262 has not been demonstrated.

9. Pursuant to 35 Ill. Adm. Code 215.106, if odor nuisance or threat to human health does not exist, the Permittee need not operate the catalytic afterburner during any time between November 1 of any year to April 1 of the following year during which an ozone advisory, alert or emergency has not been declared pursuant to 35 Ill. Adm. Code 244. If odor nuisance exists or there is a threat to public health, operation of the catalytic afterburner is required to control the emissions of the printing presses.

It should be noted that this permit has been revised so as to no longer include the operation of a lead remelt furnace and 3 ovens for lead line coaters and printers.

It should also be noted that no credit for emission reductions which may be occurring as a result of the removal of these sources is being given at this time. This decision is based on the lack of data and information establishing any reduction in actual emissions occurring.

Terry A. Sweitzer, P.E.
Manager, Permit Section
Division of Air Pollution Control

TAS:JRR:jmm/sp0275L/3-5

cc: Region 1

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62706

STANDARD CONDITIONS FOR OPERATING PERMITS

July 1, 1985

The Illinois Environmental Protection Act (Illinois Revised Statutes, Chapter 111-1/2, Section 1039) grants the Environmental Protection Agency authority to impose conditions on permits which it issues.

The following conditions are applicable unless superseded by special permit condition(s).

1. The issuance of this permit does not release the permittee from compliance with state and federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or with applicable local laws, ordinances and regulations.

2. The Agency has issued this permit based upon the information submitted by the permittee in the permit application. Any misinformation, false statement or mispresentation in the application shall be grounds for revocation under 35 Ill. Adm. Code 201.207.

3. a. The permittee shall not authorize, cause, direct or allow any modification, as defined in 35 Ill. Adm. Code 201.102, of equipment, operations or practices which are reflected in the permit application as submitted unless a new application or request for revision of the existing permit is filed with the Agency and unless a new permit or revision of the existing permit(s) is issued for such modification.

   b. This permit only covers emission sources and control equipment while physically present at the indicated plant location(s). Unless the permit specifically provides for equipment relocation, this permit is void for an item of equipment on the day it is removed from the permitted location(s) or if all equipment is removed, notwithstanding the expiration date specified on the permit.

4. The permittee shall allow any duly authorized agent of the Agency, upon the presentation of credentials, at reasonable times:

   a. to enter the permittee's property where actual or potential effluent, emission or noise sources are located or where any activity is to be conducted pursuant to this permit,

   b. to have access to and to copy any records required to be kept under the terms and conditions of this permit,

   c. to inspect, including during any hours of operation of equipment constructed or operated under this permit, such equipment and any equipment required to be kept, used, operated, calibrated and maintained under this permit,

   d. to obtain and remove samples of any discharge or emission of pollutants, and

   e. to enter and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring or recording any activity, discharge or emission authorized by this permit.

5. The issuance of this permit:

   a. shall not be considered as in any manner affecting the title of the premises upon which the permitted facilities are located,

   b. does not release the permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the facilities,

c. does not take into consideration or attest to the structural stability of any unit or part of the project, and

d. in no manner implies or suggests that the Agency (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the proposed equipment or facility.

6. The facilities covered by this permit shall be operated in such a manner that the disposal of air contaminants collected by the equipment shall not cause a violation of the Environmental Protection Act or regulations promulgated thereunder.

7. The permittee shall maintain all equipment covered under this permit in such a manner that the performance of such equipment shall not cause a violation of the Environmental Protection Act or regulations promulgated thereunder.

8. The permittee shall maintain a maintenance record on the premises for each item of air pollution control equipment. This record shall be made available to any agent of the Environmental Protection Agency at any time during normal working hours and/or operating hours. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9. No person shall cause or allow continued operation during malfunction, breakdown or startup of any emission source or related air pollution control equipment if such operation would cause a violation of an applicable emission standard or permit limitation. Should a malfunction, breakdown or startup occur which results in emissions in excess of any applicable standard or permit limitation, the permittee shall:

   a. immediately report the incident to the Agency's Regional Field Operations Section Office by telephone, telegraph, or other method as constitutes the fastest available alternative, and shall comply with all reasonable directives of the Agency with respect to the incident;

   b. maintain the following records for a period of no less than two (2) years:

      i. date and duration of malfunction, breakdown or startup,

      ii. full and detailed explanation of the cause,

      iii. contaminants emitted and an estimate of quantity of emissions,

      iv. measures taken to minimize the amount of emissions during the malfunction, breakdown or startup, and

      v. measures taken to reduce future occurrences and frequency of incidents.

10. If the permit application contains a compliance program and project completion schedule, the permittee shall submit a project completion status report within thirty (30) days of any date specified in the compliance program and project completion schedule or at six month intervals, whichever is more frequent.

11. Beginning one year from the date of this permit the permittee shall submit an "Annual Emission Report," form APC-208, as required by 35 Ill. Adm. Code 201.302. (Note: If the permittee has other operating permits for this facility, the "Annual Emission Report" for all such permits may be included in a single annual submission.)

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62794-9276

ANNUAL EMISSION REPORT	FOR AGENCY USE ONLY

1a. NAME OF OWNER:		2a. NAME OF CORPORATE DIVISION OR PLANT (IF DIFFERENT FROM OWNER)	
1b. TELEPHONE NUMBER		2b. STREET ADDRESS OF EMISSION SOURCE:	
1c. STREET ADDRESS OF OWNER		2c. CITY OF EMISSION SOURCE:	2d. TELEPHONE NUMBER:
1d. CITY:		2e. COUNTY:	2f. LOCATED WITHIN CITY LIMITS: ☐ YES ☐ NO
1e. STATE:	1f. ZIP CODE:	2g. TOWNSHIP:	2h. ZIP CODE:

PERMIT INFORMATION AND REFERENCE

3. Application Number	Identification Number	Is the data and information Previously Submitted True, Correct, Current and Complete?	During This Reporting Period Maximum Emissions From This Operation Have: Increased	Remained The Same	Decreased	Percentage by Which Emissions Have Increased or Decreased
_____	_____	☐ YES ☐ NO				%
_____	_____	☐ YES ☐ NO				%
_____	_____	☐ YES ☐ NO				%
_____	_____	☐ YES ☐ NO				%

4. PERIOD COVERED BY THIS REPORT: FROM _____ TO _____

5. THE ABOVE INFORMATION IS SUBMITTED IN ACCORDANCE WITH 35 ILL. ADM. CODE 201.302 AS ADOPTED APRIL 14, 1972, AND THE INFORMATION IS TRUE, CORRECT, COMPLETE, AND CURRENT. THE SIGNATURE MUST BE THAT OF THE PERSON AUTHORIZED TO EXECUTVE AN OPERATING PERMIT APPLICATION.

AUTHORIZED SIGNATURE _____

A COPY OF THIS FORM MUST BE SUBMITTED FOR EACH PERMIT APPLICATION LISTED ABOVE.

THIS DOCUMENT IS NOT A PERMIT APPLICATION AND IS SOLELY FOR STATISTICAL AND INFORMATION PURPOSES.

IF THE INFORMATION CONTAINED IN A LISTED PERMIT APPLICATION IS NO LONGER CORRECT, MATERIAL CORRECTING THE APPLICATION SHOULD BE SENT TO THE PERMIT SECTION OF THE DIVISION OF AIR POLLUTION CONTROL. IF THE CORRECTION IS DUE TO A MODIFICATION (INCREASE IN EMISSION) OR NEW EQUIPMENT, THIS MATERIAL SHOULD BE SUBMITTED AS A CONSTRUCTION PERMIT APPLICATION. OTHERWISE A LETTER EXPLAINING THE CORRECTION WILL BE SUFFICIENT.

DIRECTORY
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL

July 1, 1985

For assistance in preparing a permit application contact the Permit Section,

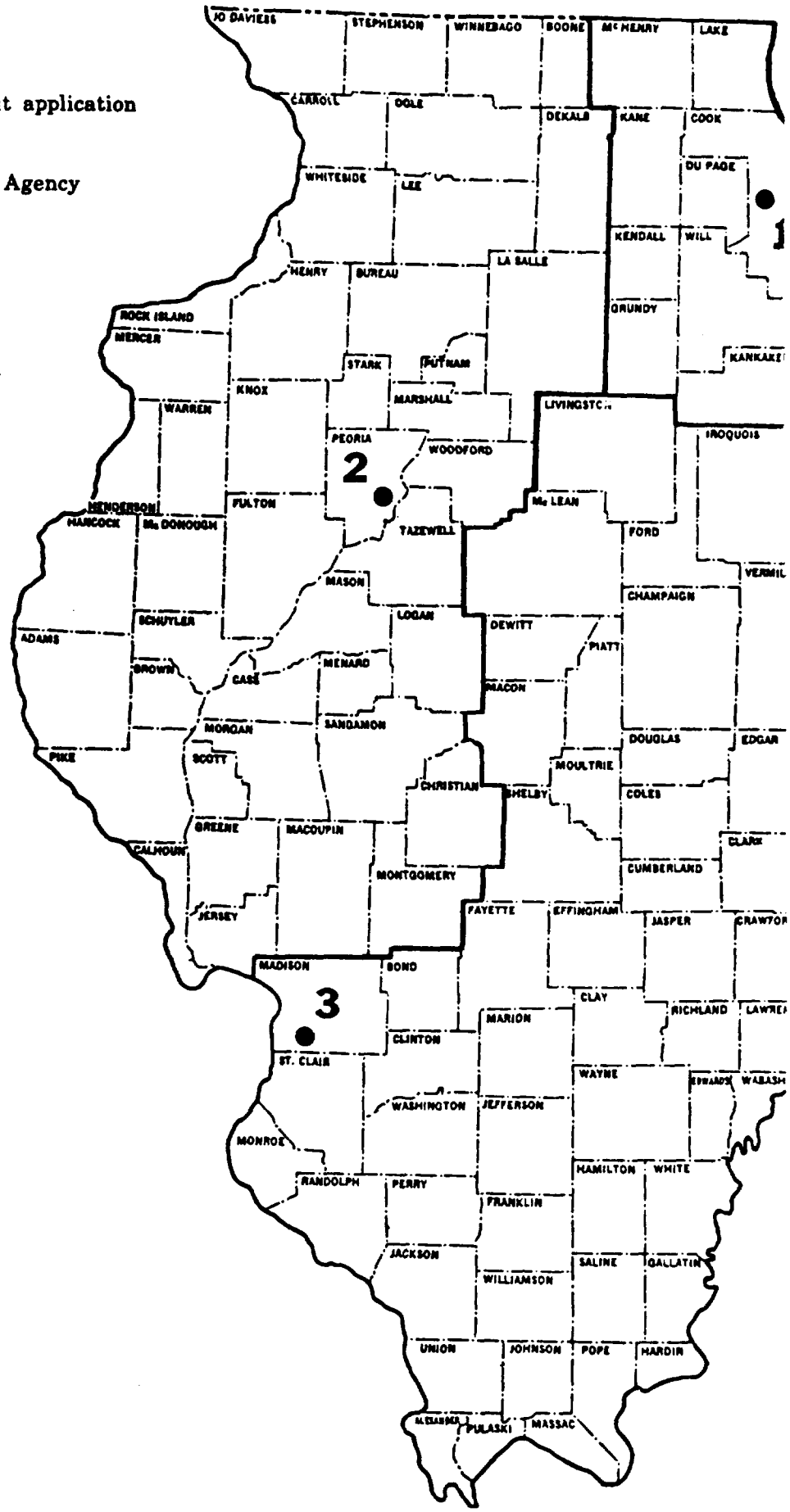
Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section
2200 Churchill Road
Springfield, Illinois 62706
(217) 782-2113

or a regional office of the Field Operations Section. The regional offices and their areas of responsibility are shown on the map. The addresses and telephone numbers of the regional offices are as follows:

Illinois EPA
Region 1
Intercontinental Center
1701 S. 1st Avenue
Maywood, Illinois 60153
(312) 345-9780

Illinois EPA
Region 2
5415 North University
Peoria, Illinois 61614
(309) 691-2200

Illinois EPA
Region 3
2009 Mall Street
Collinsville, Illinois 62234
(618) 345-0700



J.L.CLARK
a member of the CLARCOR packaging products group

April 30, 1990

Mr. Terry A. Sweitzer
Manager, Permit Section
Illinois Environmental Protection Agency
Division of Air Pollution Control
P.O. Box 19276
Springfield, Illinois 62794-9276

- CERTIFIED MAIL -
P 945 779 253

Dear Mr. Sweitzer:

We currently have a facility operating permit, 73030535 for our division, I.D. No. 043030AAR, J. L. Clark - Atlas Tube Division, 2300 Wisconsin Avenue, Downers Grove, Illinois 60515.

Please be advised that we have discontinued the production of lead tubes at the facility. This would necessitate removal of the three ovens for lead line coaters and printers and the lead re-melt furnace. With reference to permit application, these would reflect removal of emissions from points "C" and "E" on lines 7S, 8S and 9S.

We would request that the agency review this permit and either reissue the permit without the above equipment or document removal of these items from the existing permit. We will maintain documentation pertinent to the production on these production lines for future use if additional new equipment is added in replacement. We would want to establish credit for emissions generated from these lines.

Should you have any further questions or require additional information, please contact me at (815)962-8861 or the address below.

Sincerely,

[redacted]
Chemist/Environm[redacted]

/tkb

cc: Gordon VerW[redacted]

bcc: Dick Anders[redacted]
Greg Gann

2300 Sixth Street, P.O. Box 7000
Rockford, Illinois 61125
815/962-8861
FAX: 815/962-6356

P 945 779 253
RECEIPT FOR CERTIFIED MAIL
NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

Sent to	IEPA
Street and No.	P.O. Box 19276
P.O., State and ZIP Code	Springfield Il 62794-9276
Postage	$ .25
Certified Fee	.55
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	.90
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	$ 2.00
Postmark or Date	APR 30 1990

PS Form 3800, June 1985

Illinois Environmental Protection Agency · P. O. Box 19276, Springfield, IL 62794-9276

217/782-2113

CONSTRUCTION PERMIT

PERMITTEE

J.L. Clark
Attn: James K. Klotz, Chief Chemist
2300 Sixth Street
Rockford, Illinois 61104

RECEIVED CLARCOR ROCKFORD, ILL. SEP 15 12 56 PM '88

Application No.: 88040069
I.D. No.: 043030AAR
Applicant's Designation: 3500
Date Received: April 22, 1988
Subject: Hinterkopf Aluminum Tube Line
Date Issued: September 12, 1988
Location: 2300 Wisconsin AVenue, Downers Grove

Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of an extrusion press, an annealing oven, a roller coater, a printer, a curing oven for the roller coater & printer and a fume incinerator which controls emissions from the existing coating lines & the new Hinterkopf line as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1. Emissions of nitrogen oxides from the annealing oven and the curing oven of the Hinterkopf line shall not exceed 0.3 ton per year. This limit is based on maximum heat input rate, 6000 hours of operation per year and the standard emission factors for natural gas combustion.

2. Emission of organic materials from the Hinterkopf line shall not exceed 2.5 ton per year. This limit is based on maximum uncontrolled emissions of 4.0 tons/year, 75 percent overall control efficiency of the fume incinerator and the capture system and allowance provided in the condition #10 of this permit.

3. The Permittee shall maintain the fume incinerator combustion chamber temperature at the manufacturer's recommended level but not lower than 1400°F.

4a. This permit authorizes operation of coating lines other than the new Hinterkopf line based on an ongoing demonstration of compliance with Section 215.207, "Aggregation of Emission Sources," in that the Agency has approved the methods or procedures to be used to determine emissions pursuant to this Section. Pursuant to this Section, on each day the actual emissions of volatile organic material (VOM) shall be less than the allowable emissions, as determined for that day. The methods or procedures used to determine emissions of volatile organic material shall be in accordance with any procedures described in the application and the conditions of this permit.

b. The Permittee shall calculate daily allowable emissions by taking the product of the actual volume of solids in the coating for the day, in accordance with Section 215.207(b) and the applicable emission limit of Section 215.204(b) converted to pound of VOM/gallon coating solids, using the density of the solvent in the coating, and the actual volume of solids in the coating for the day.

c. The Permittee shall calculate actual emissions for a coating line assuming the overall 95% destruction of VOM represented in the application, for the combination of the capture system and afterburner, only if they are operated as described in the permit application, with a minimum afterburner temperature of 1400 degrees Fahrenheit. The afterburner combustion chamber shall be heated to this temperature before beginning operation of a coating line controlled by the afterburner.

5. The afterburner shall be equipped with a continuous temperature indicator.

6a. The Permittee shall maintain daily compliance records for the existing coating lines if operating pursuant to Section 215.207, including:

i) for each coating line, the name and volume of each coating used (gallon), the VOM content (pound/gallon), the solids content (volume %), the actual VOM emissions (pound) and the allowable VOM emissions (pound). All the above shall exclude any water or exempt compounds in the coating.

ii) the operating temperature of the afterburner(s) (Fahrenheit).

iii) the aggregate actual and allowable emissions (pounds/day).

b. The Permittee shall maintain monthly records for the new Hinterkopf line and the existing lines including:

i) the coatings used on the line

ii) the VOM emissions.

c. These records shall be retained for a period of two years and shall be available to the Agency for inspection.

7a. An annual report shall be sent to the Agency summarizing VOM emissions and compliance with Section 215.207 including:

i) For lines operating pursuant to Section 215.207:

A) total VOM emissions (pound).
B) average daily actual and allowable VOM emissions (pounds/operating day).
C) sample compliance calculations for one actual day.

D) days in which the actual emissions exceeded the allowable with date, actual and allowable emissions, cause of exceedance, and corrective action, if any.

ii) For the new Hinterkopf line and existing lines the annual VOM emissions with supporting calculations.

b. These reports shall be sent beginning January 1, 1989 no later than 20 days after the end of the reporting period to the Permit Section and:

Illinois Environmental Protection Agency
Division of Air Pollution Control
The Intercontinental Center
1701 First Avenue
Maywood, IL 60153

8. Operation of the coating & printing lines is not permitted during malfunction and breakdown of the fume incinerator because compliance with 35 Ill. Adm. Code 201.262 has not been demonstrated.

9. Pursuant to 35 Ill. Adm. Code 215.106, if odor nuisance or threat to human health does not exist, the Permittee need not operate the catalytic afterburner during any time between November 1 of any year to April 1 of the following year during which an ozone advisory, alert or emergency has not been declared pursuant to 35 Ill. Adm. Code 244. If odor nuisance exists or there is a threat to public health, operation of the catalytic afterburner is required to control the emissions of the printing presses.

Terry A. Sweitzer

Terry A. Sweitzer, P.E.
Manager, Permit Section
Division of Air Pollution Control

TAS:VVG:jmm/5069H/19-21

cc: Region 1

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62706

STANDARD CONDITIONS FOR CONSTRUCTION/DEVELOPMENT PERMITS ISSUED BY THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

July 1, 1985

The Illinois Environmental Protection Act (Illinois Revised Statutes, Chapter 111-1/2, Section 1039) authorizes the Environmental Protection Agency to impose conditions on permits which it issues.

The following conditions are applicable unless susperseded by special condition(s).

1. Unless this permit has been extended or it has been voided by a newly issued permit, this permit will expire one year from the date of issuance, unless a continuous program of construction or development on this project has started by such time.

2. The construction or development covered by this permit shall be done in compliance with applicable provisions of the Illinois Environmental Protection Act and Regulations adopted by the Illinois Pollution Control Board.

3. There shall be no deviations from the approved plans and specifications unless a written request for modification, along with plans and specifications as required, shall have been submitted to the Agency and a supplemental written permit issued.

4. The permittee shall allow any duly authorized agent of the Agency upon the presentation of credentials, at reasonable times:

   a. to enter the permittee's property where actual or potential effluent, emission or noise sources are located or where any activity is to be conducted pursuant to this permit,

   b. to have access to and to copy any records required to be kept under the terms and conditions of this permit,

   c. to inspect, including during any hours of operation of equipment constructed or operated under this permit, such equipment and any equipment required to be kept, used, operated, calibrated and maintained under this permit,

   d. to obtain and remove samples of any discharge or emissions of pollutants, and

   e. to enter and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring, or recording any activity, discharge, or emission authorized by this permit.

5. The issuance of this permit:

   a. shall not be considered as in any manner affecting the title of the premises upon which the permitted facilities are to be located,

   b. does not release the permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the proposed facilities,

   c. does not release the permittee from compliance with other applicable statutes and regulations of the United States, of the State of Illinois, or with applicable local laws, ordinances and regulations,

   d. does not take into consideration or attest to the structural stability of any units or parts of the project, and

e. in no manner implies or suggests that the Agency (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the proposed equipment or facility.

6. a. Unless a joint construction/operation permit has been issued, a permit for operation shall be obtained from the Agency before the equipment covered by this permit is placed into operation.

   b. For purposes of shakedown and testing, unless otherwise specified by a special permit condition, the equipment covered under this permit may be operated for a period not to exceed thirty (30) days.

7. The Agency may file a complaint with the Board for modification, suspension or revocation of a permit:

   a. upon discovery that the permit application contained misrepresentations, misinformation or false statements or that all relevant facts were not disclosed, or

   b. upon finding that any standard or special conditions have been violated, or

   c. upon any violations of the Environmental Protection Act or any regulation effective thereunder as a result of the construction or development authorized by this permit.

DIRECTORY
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL

July 1, 1985

For assistance in preparing a permit application contact the Permit Section,

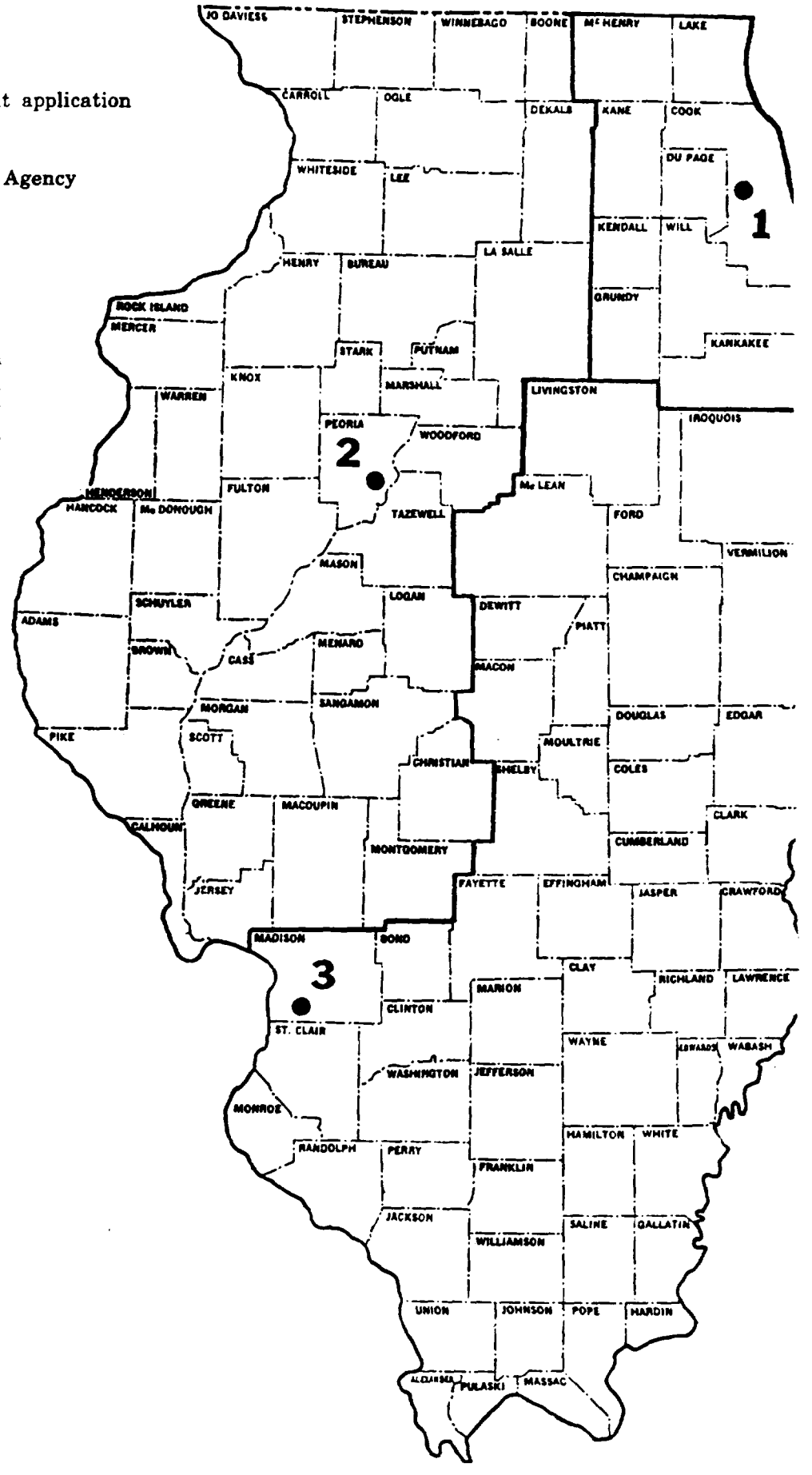
Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section
2200 Churchill Road
Springfield, Illinois 62706
(217) 782-2113

or a regional office of the Field Operations Section. The regional offices and their areas of responsibility are shown on the map. The addresses and telephone numbers of the regional offices are as follows:

Illinois EPA
Region 1
Intercontinental Center
1701 S. 1st Avenue
Maywood, Illinois 60153
(312) 345-9780

Illinois EPA
Region 2
5415 North University
Peoria, Illinois 61614
(309) 691-2200

Illinois EPA
Region 3
2009 Mall Street
Collinsville, Illinois 62234
(618) 345-0700



Illinois Environmental Protection Agency · P. O. Box 19276, Springfield, IL 62794-9276

217/782-2113

OPERATING PERMIT

RECEIVED
CLARCOR
ROCKFORD, ILL.
SEP 15 12 53 PM '88

PERMITTEE

J.L. Clark
Attn: James K. Klotz, Chief Chemist
2300 Sixth Street
Rockford, Illinois 61104

Application No.: 73030535
I.D. No.: 043030AAR
Applicant's Designation:
Date Received: April 22, 1988
Subject: Aluminum & Lead Tube Lines
Date Issued: September 12, 1988
Expiration Date: September 30, 1992
Location: 2300 Wisconsin Avenue, Downers Grove

Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of a new Hinterkopf line consisting of an extrusion press, an annealing oven, a roller coater & printer and a curing oven, 9 existing annealing ovens (4 electric & 5 gas), 9 existing roller coaters for aluminum lines & five existing roller coaters for lead lines (only one used at a time), 9 existing printers, 9 curing ovens for printers, 2 internal tube lining machines, 2 curing ovens for internal coaters, a lead remelt furnace, 5 roller coaters for lead lines (only one used at a time), 3 ovens for lead line coaters & printers and a fume incinerator for the coaters & printers as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1. Emissions of nitrogen oxides from the annealing oven and the curing oven of the Hinterkopf line shall not exceed 0.3 ton per year. This limit is based on maximum heat input rate, 6000 hours of operation per year and the standard emission factors for natural gas combustion.

2. Emission of organic materials from the Hinterkopf line shall not exceed 2.5 ton per year. This limit is based on maximum uncontrolled emissions of 4.0 tons/year, 75 percent overall control efficiency of the fume incinerator and the capture system and allowance provided in the condition #10 of this permit.

3. The Permittee shall maintain the fume incinerator combustion chamber temperature at the manufacturer's recommended level but not lower than 1400°F.

4a. This permit authorizes operation of coating lines other than the new Hinterkopf line based on an ongoing demonstration of compliance with Section 215.207, "Aggregation of Emission Sources," in that the Agency has approved the methods or procedures to be used to determine emissions pursuant to this Section. Pursuant to this Section, on each day the actual emissions of volatile organic material (VOM) shall be less than the allowable emissions, as determined for that day. The methods or procedures used to determine emissions of volatile organic material shall be in accordance with any procedures described in the application and the conditions of this permit.

b. The Permittee shall calculate daily allowable emissions by taking the product of the actual volume of solids in the coating for the day, in accordance with Section 215.207(b) and the applicable emission limit of Section 215.204(b) converted to pound of VOM/gallon coating solids, using the density of the solvent in the coating, and the actual volume of solids in the coating for the day.

c. The Permittee shall calculate actual emissions for a coating line assuming the overall 95% destruction of VOM represented in the application, for the combination of the capture system and afterburner, only if they are operated as described in the permit application, with a minimum afterburner temperature of 1400 degrees Fahrenheit. The afterburner combustion chamber shall be heated to this temperature before beginning operation of a coating line controlled by the afterburner.

5. The afterburner shall be equipped with a continuous temperature indicator.

6a. The Permittee shall maintain daily compliance records for the existing coating lines if operating pursuant to Section 215.207, including:

i) for each coating line, the name and volume of each coating used (gallon), the VOM content (pound/gallon), the solids content (volume %), the actual VOM emissions (pound) and the allowable VOM emissions (pound). All the above shall exclude any water or exempt compounds in the coating.

ii) the operating temperature of the afterburner(s) (Fahrenheit).

iii) the aggregate actual and allowable emissions (pounds/day).

b. The Permittee shall maintain monthly records for the new Hinterkopf line and the existing lines including:

i) the coatings used on the line

ii) the VOM emissions.

c. These records shall be retained for a period of two years and shall be available to the Agency for inspection.

7a. An annual report shall be sent to the Agency summarizing VOM emissions and compliance with Section 215.207 including:

i) For lines operating pursuant to Section 215.207:

A) total VOM emissions (pound).
B) average daily actual and allowable VOM emissions (pounds/operating day).
C) sample compliance calculations for one actual day.
D) days in which the actual emissions exceeded the allowable with date, actual and allowable emissions, cause of exceedance, and corrective action, if any.

ii) For the new Hinterkopf line and existing lines the annual VOM emissions with supporting calculations.

b. These reports shall be sent beginning January 1, 1989 no later than 20 days after the end of the reporting period to the Permit Section and:

Illinois Environmental Protection Agency
Division of Air Pollution Control
The Intercontinental Center
1701 First Avenue
Maywood, IL 60153

8. Operation of the coating & printing lines is not permitted during malfunction and breakdown of the fume incinerator because compliance with 35 Ill. Adm. Code 201.262 has not been demonstrated.

9. Pursuant to 35 Ill. Adm. Code 215.106, if odor nuisance or threat to human health does not exist, the Permittee need not operate the catalytic afterburner during any time between November 1 of any year to April 1 of the following year during which an ozone advisory, alert or emergency has not been declared pursuant to 35 Ill. Adm. Code 244. If odor nuisance exists or there is a threat to public health, operation of the catalytic afterburner is required to control the emissions of the printing presses.

Terry A. Sweitzer

Terry A. Sweitzer, P.E.
Manager, Permit Section
Division of Air Pollution Control

TAS:VVG:jmm/5069H/16-18

cc: Region 1

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62706

STANDARD CONDITIONS FOR OPERATING PERMITS

July 1, 1985

The Illinois Environmental Protection Act (Illinois Revised Statutes, Chapter 111-1/2, Section 1039) grants the Environmental Protection Agency authority to impose conditions on permits which it issues.

The following conditions are applicable unless superseded by special permit condition(s).

1. The issuance of this permit does not release the permittee from compliance with state and federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or with applicable local laws, ordinances and regulations.

2. The Agency has issued this permit based upon the information submitted by the permittee in the permit application. Any misinformation, false statement or mispresentation in the application shall be grounds for revocation under 35 Ill. Adm. Code 201.207.

3. a. The permittee shall not authorize, cause, direct or allow any modification, as defined in 35 Ill. Adm. Code 201.102, of equipment, operations or practices which are reflected in the permit application as submitted unless a new application or request for revision of the existing permit is filed with the Agency and unless a new permit or revision of the existing permit(s) is issued for such modification.

   b. This permit only covers emission sources and control equipment while physically present at the indicated plant location(s). Unless the permit specifically provides for equipment relocation, this permit is void for an item of equipment on the day it is removed from the permitted location(s) or if all equipment is removed, notwithstanding the expiration date specified on the permit.

4. The permittee shall allow any duly authorized agent of the Agency, upon the presentation of credentials, at reasonable times:

   a. to enter the permittee's property where actual or potential effluent, emission or noise sources are located or where any activity is to be conducted pursuant to this permit,

   b. to have access to and to copy any records required to be kept under the terms and conditions of this permit,

   c. to inspect, including during any hours of operation of equipment constructed or operated under this permit, such equipment and any equipment required to be kept, used, operated, calibrated and maintained under this permit,

   d. to obtain and remove samples of any discharge or emission of pollutants, and

   e. to enter and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring or recording any activity, discharge or emission authorized by this permit.

5. The issuance of this permit:

   a. shall not be considered as in any manner affecting the title of the premises upon which the permitted facilities are located,

   b. does not release the permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the facilities,

c. does not take into consideration or attest to the structural stability of any unit or part of the project, and

d. in no manner implies or suggests that the Agency (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the proposed equipment or facility.

6. The facilities covered by this permit shall be operated in such a manner that the disposal of air contaminants collected by the equipment shall not cause a violation of the Environmental Protection Act or regulations promulgated thereunder.

7. The permittee shall maintain all equipment covered under this permit in such a manner that the performance of such equipment shall not cause a violation of the Environmental Protection Act or regulations promulgated thereunder.

8. The permittee shall maintain a maintenance record on the premises for each item of air pollution control equipment. This record shall be made available to any agent of the Environmental Protection Agency at any time during normal working hours and/or operating hours. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9. No person shall cause or allow continued operation during malfunction, breakdown or startup of any emission source or related air pollution control equipment if such operation would cause a violation of an applicable emission standard or permit limitation. Should a malfunction, breakdown or startup occur which results in emissions in excess of any applicable standard or permit limitation, the permittee shall:

   a. immediately report the incident to the Agency's Regional Field Operations Section Office by telephone, telegraph, or other method as constitutes the fastest available alternative, and shall comply with all reasonable directives of the Agency with respect to the incident;

   b. maintain the following records for a period of no less than two (2) years:

      i. date and duration of malfunction, breakdown or startup,

      ii. full and detailed explanation of the cause,

      iii. contaminants emitted and an estimate of quantity of emissions,

      iv. measures taken to minimize the amount of emissions during the malfunction, breakdown or startup, and

      v. measures taken to reduce future occurrences and frequency of incidents.

10. If the permit application contains a compliance program and project completion schedule, the permittee shall submit a project completion status report within thirty (30) days of any date specified in the compliance program and project completion schedule or at six month intervals, whichever is more frequent.

11. Beginning one year from the date of this permit the permittee shall submit an "Annual Emission Report," form APC-208, as required by 35 Ill. Adm. Code 201.302. (Note: If the permittee has other operating permits for this facility, the "Annual Emission Report" for all such permits may be included in a single annual submission.)

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62706

This Agency is authorized to require this information un Illinois Revised Statutes, 1979, Chapter 111 1/2, Section 1C Disclosure of this information is required. Failure to do may result in a civil penalty up to $10,000.00 and an ad civil penalty up to $1,000.00 for each day the failure co a fine up to $1,000.00 and imprisonment up to one year. form has been approved by the Forms Management Cent

ANNUAL EMISSION REPORT	FOR AGENCY USE ONLY

1a. NAME OF OWNER:		2a. NAME OF CORPORATE DIVISION OR PLANT (IF DIFFERENT FROM OWNER):	
1b. TELEPHONE NUMBER:		2b. STREET ADDRESS OF EMISSION SOURCE:	
1c. STREET ADDRESS OF OWNER:		2c. CITY OF EMISSION SOURCE:	2d. TELEPHONE NUMBER:
1d. CITY:		2e. COUNTY:	2f. LOCATED WITHIN CITY LIMITS: ☐ YES ☐ NO
1e. STATE:	1f. ZIP CODE:	2g. TOWNSHIP:	2h. ZIP CODE:

PERMIT INFORMATION AND REFERENCE

3. APPLICATION NUMBER	IDENTIFICATION NUMBER	IS THE DATA AND INFORMATION PREVIOUSLY SUBMITTED TRUE, CORRECT, CURRENT AND COMPLETE?	DURING THIS REPORTING PERIOD MAXIMUM EMISSIONS FROM THIS OPERATION HAVE: INCREASED	REMAINED THE SAME	DECREASED	PERCENTAGE BY WHICH EMISSIONS HAVE INCREASED OR DECREASED
		☐ YES ☐ NO				%
		☐ YES ☐ NO				%
		☐ YES ☐ NO				%
		☐ YES ☐ NO				%

4. PERIOD COVERED BY THIS REPORT:
FROM _____ TO _____

5. THE ABOVE INFORMATION IS SUBMITTED IN ACCORDANCE WITH PCB REGS., CHAPTER 2, RULE 107(b) AS ADOPTED APRIL 14, 1972, AND THE INFORMATION IS TRUE, CORRECT, COMPLETE, AND CURRENT. THE SIGNATURE MUST BE THAT OF THE PERSON AUTHORIZED TO EXECUTE AN OPERATING PERMIT APPLICATION.

AUTHORIZED SIGNATURE _____

A COPY OF THIS FORM MUST BE SUBMITTED FOR EACH PERMIT APPLICATION LISTED ABOVE.

THIS DOCUMENT IS NOT A PERMIT APPLICATION AND IS SOLELY FOR STATISTICAL AND INFORMATIONAL PURPOSES.

IF THE INFORMATION CONTAINED IN A LISTED PERMIT APPLICATION IS NO LONGER CORRECT, MATERIAL CORRECTING THE APPLICATION SHOULD BE SENT TO THE PERMIT SECTION OF THE DIVISION OF AIR POLLUTION CONTROL. IF THE CORRECTION IS DUE TO A MODIFICATION (INCREASE IN EMISSIONS) OR NEW EQUIPMENT, THIS MATERIAL SHOULD BE SUBMITTED AS A CONSTRUCTION PERMIT APPLICATION. OTHERWISE A LETTER EXPLAINING THE CORRECTION WILL BE SUFFICIENT.

IL 532-0242

DIRECTORY
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL

July 1, 1985

For assistance in preparing a permit application contact the Permit Section,

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section
2200 Churchill Road
Springfield, Illinois 62706
(217) 782-2113

or a regional office of the Field Operations Section. The regional offices and their areas of responsibility are shown on the map. The addresses and telephone numbers of the regional offices are as follows:

Illinois EPA
Region 1
Intercontinental Center
1701 S. 1st Avenue
Maywood, Illinois 60153
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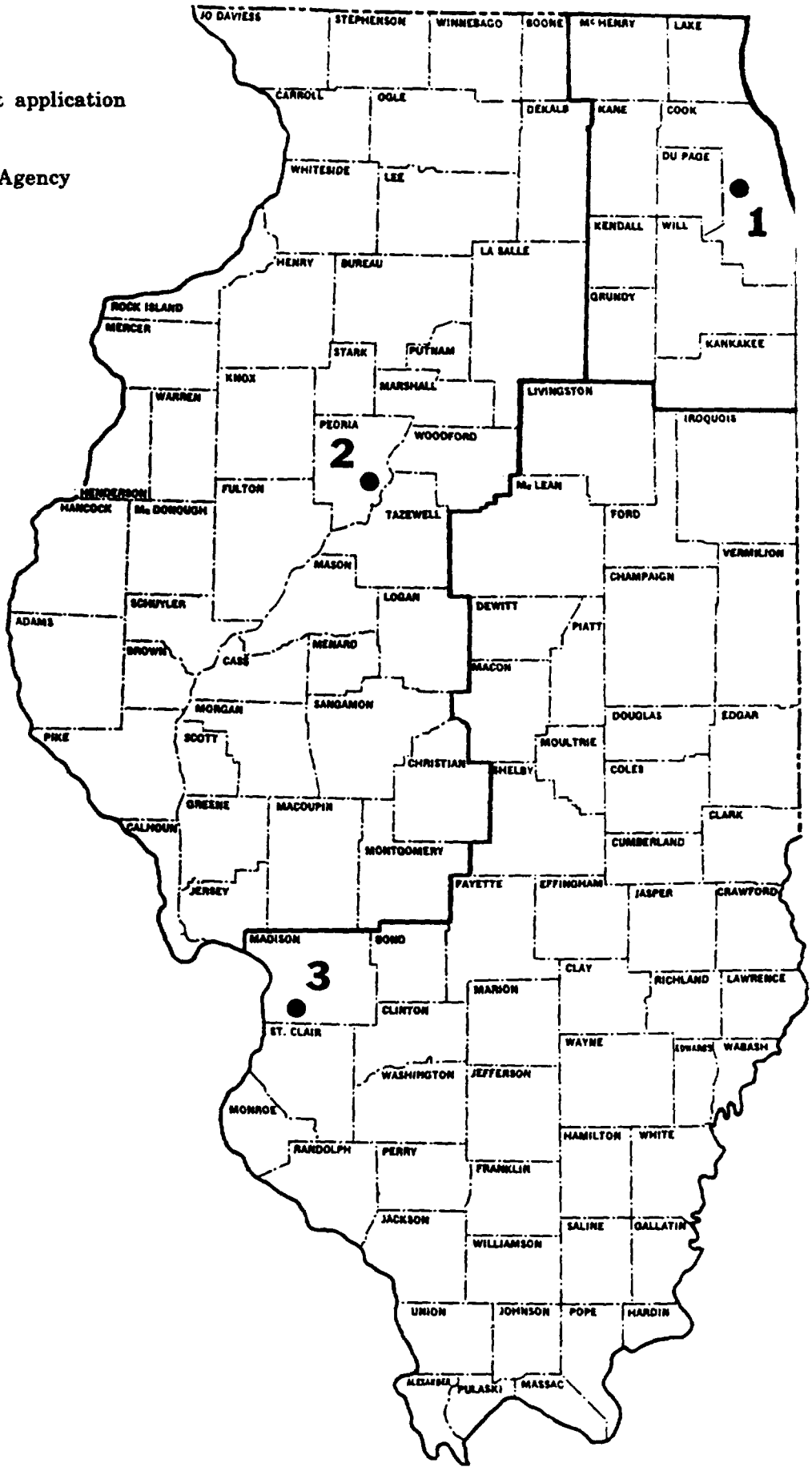
Illinois EPA
Region 2
5415 North University
Peoria, Illinois 61614
(309) 691-2200

Illinois EPA
Region 3
2009 Mall Street
Collinsville, Illinois 62234
(618) 345-0700



Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

DIVISION OF AIR POLLUTION CONTROL

SITE FEE BILL

043030AAR
J.L. CLARK
ATTN: JAMES K. KLOTZ, CHIEF CHEMIST
2300 SIXTH STREET
ROCKFORD, IL 61104
SITE: 2300 WISCONSIN AVENUE
DOWNERS GROVE

Annual Fee Due: $ 75.00 ____
$250.00 X

Date: 9/12/88

PAYMENT IS DUE 30-DAYS FROM THE ABOVE DATE.

Mail check or money order only, made payable to "Treasurer, State of Illinois."

Mail payment to Fiscal Services Section, Illinois E.P.A., 2200 Churchill Road, Springfield, Illinois, 62706.

Inquiries may be directed to Illinois E.P.A., Division of Air Pollution Control, Permit Section, 2200 Churchill Road, Springfield, Illinois, 62706, 217/7822113.

TO ENSURE PROPER CREDIT, COMPLETE BOTTOM PORTION AND RETURN WITH PAYMENT

DIVISION OF AIR POLLUTION CONTROL

SITE FEE PAYMENT

MAIL TO:

Fiscal Services Section
Illinois E.P.A.
2200 Churchill Road
Springfield, Illinois
62706

043030AAR
J.L. CLARK
ATTN: JAMES K. KLOTZ, CHIEF CHEMIST
2300 SIXTH STREET
ROCKFORD, IL 61104
SITE: 2300 WISCONSIN AVENUE
DOWNERS GROVE

FEIN Number: _____

Amount Enclosed: $_____

METHOD OF PAYMENT: (Check One)

* Annual Payment _____

* Multi-Year Payment _____

For _____ years, based on operating permit application number _ _ _ _ _ _ _ term _____ years; expiration date __/__/__.

(See 35 Ill. Adm. Code 251.208: Procedures for Collection of Air Pollution Site Fees)

PLEASE RETURN THIS PORTION WITH PAYMENT

IL 532-1449
APC 431 1/88

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

NOTICE TO OWNERS AND OPERATORS OF ANY SITE RECEIVING AN AIR POLLUTION OPERATING PERMIT

The Illinois Legislature passed House Bill 1774 which authorizes the Agency to collect air pollution site fees from owners and operators of sites receiving an operating permit from the Division of Air Pollution Control after January 1, 1986. This Act sets an annual fee for sites permitted to emit 25 tons per year or more of all regulated pollutants at $250.00 and for sites permitted to emit less than 25 tons per year of all regulated pollutants at $75.00.

Attached are Agency rules (35 Ill. Adm. Code 251: Procedures for Collection of Air Pollution Site Fees) developed by the Division of Air Pollution Control in order to implement the requirements of the legislation as provided for in Section 22.8(e). These rules have been filed with the Secretary of State as final rules.

The Agency encourages you to carefully read these procedures in order to become familiar with how the Agency will assess and collect the fees, time, form and method of payment provided, and how you may request reconsideration of the amount of the air pollution site fee determined by the Agency.

DGC:rd1409F/14

Attachment

TITLE 35: ENVIRONMENTAL PROTECTION
SUBTITLE B: AIR POLLUTION
CHAPTER V: ENVIRONMENTAL PROTECTION AGENCY

PART 251
PROCEDURES FOR COLLECTION OF AIR POLLUTION SITE FEES

SUBPART A: INTRODUCTION

Section
251.101 Purpose
251.103 Definitions

SUBPART B: PROCEDURES FOR BILLING AND COLLECTION OF AIR POLLUTION SITE FEES

Section
251.201 Amount of Air Pollution Site Fee
251.203 Agency Billing Procedures
251.208 Time and Method of Payment
251.210 Form of Payment
251.212 Return of Site Fee
251.215 Prohibition Against Refund

SUBPART C: RESOLUTION OF DISPUTES

Section
251.301 Request for Reconsideration
251.305 Effect of Request for Reconsideration
251.308 Agency Response
251.310 Appeal of Final Agency Action

AUTHORITY: Implementing Section 5 and authorized by Section 22.8(g) of the Environmental Protection Act (Ill. Rev. Stat. 1985, Ch. 111 1/2, pars. 1005 and 1022.8).

SOURCE: Adopted at ___ Ill. Reg. _____, effective _____.

SUBPART A: INTRODUCTION

Section 251.101 Purpose

The purpose of this Part is to establish a system for determination and for collection of air pollution site fees.

Section 251.103 Definitions

"Act": the Environmental Protection Act, (Ill. Rev. Stat. 1983, ch. 111 1/2, pars. 1001 et seq.).

"Agency": the Environmental Protection Agency established by the Environmental Protection Act.

"Annual Fee": the air pollution site fee prescribed by Section 22.8(g) of the Act and collected by the Agency pursuant to this Part.

"Permitted to Emit": the sum of allowable emissions of regulated pollutants at a site from all emission sources which have received an operating permit from the Agency's Division of Air Pollution Control.

"Regulated pollutant": Any contaminant which is emitted to the atmosphere and which is regulated under the Act or the regulations of the Illinois Pollution Control Board.

"Site": Any location, place, tract of land, and facilities, including but not limited to buildings, and improvements used for purposes subject to regulation or control by the Environmental Protection Act or regulations thereunder.

SUBPART B: PROCEDURES FOR BILLING AND COLLECTION OF AIR POLLUTION SITE FEES

Section 251.201 Amount of Air Pollution Site Fee

a) An annual air pollution site fee shall be paid by the owner or operator of an air pollution site, in accordance with the requirements of this Part, in the amounts set forth below:

   1) For a site permitted to emit less than 25 tons per year, the annual fee shall be $75.

   2) For a site permitted to emit 25 tons or more per year, the annual fee shall be $250.

b) The Agency shall annually assess the amount of the air pollution site fee due based upon its records of permitted sites and allowable emissions from those sites.

c) It shall be the obligation of the owner or operator to notify the Agency's Division of Air Pollution Control, in writing, of the cessation of or reduction in the operation at the site and to request revision or withdrawal of all appropriate operating permits. Notification and requests shall be sent to:

Division of Air Pollution Control, Permit Section
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

d) No annual fee shall be due from the owner or operator of a site if the owner or operator has notified the Agency in writing that operation at the site has ceased and has requested withdrawal of all operating permits.

Section 251.203 Agency Billing Procedures

a) The amount of the air pollution site fee and the due date of payment shall be included on a billing statement attached to the first operating permit issued after January 1, 1986, to the owner or operator of a site by the Agency's Division of Air Pollution Control.

b) For each year subsequent to the year of issuance as described in subsection (a), the amount of the air pollution site fee and the due date of payment shall be included on a billing statement addressed to the owner or operator of a site and mailed by the Agency at least 30 days prior to the due date of payment.

c) In the event of an increased assessment in fees due to increase in allowable emissions at a site, the Agency shall notify the owner or operator of a site of such increase on the annual billing statement.

d) If the owner or operator of a site has elected the advance payment method described in Section 251.208(a)(2) the annual billing statement shall include notification of increased assessment in fees due to increase in allowable emissions at the site, the status of the fee account, and a statement of any additional fees due to the Agency from the owner or operator of the site.

Section 251.208 Time and Method of Payment

a) The owner or operator of a site shall make payment to the Agency by either of the following methods:

1) Payment shall be made annually in the amount described in Section 251.201; or

2) Payment may be made in advance in the amount described in Section 251.201 multiplied by the number of years for which the first operating permit after January 1, 1986, has been issued to the owner or operator of a site by the Agency's Division of Air Pollution Control or multiplied by the number of years remaining on the longest-term valid operating permit issued to the owner or operator of a site.

b) The due date of payment shall be:

1) A date 30 days subsequent to the date of the billing statement mailed to the owner or operator of a site; or

2) For succeeding years, a date corresponding in month and day to the due date described in subsection (1).

Section 251.210 Form of Payment

a) Payment shall be made by check or money order payable to "Treasurer, State of Illinois," and shall be accompanied by the site name and identification number assigned by the Agency's Division of Air Pollution Control.

b) Payment shall be mailed to:

Fiscal Services Section
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

c) Payment shall not include any fees due to the Agency for any purpose other than the air pollution site fee.

Section 251.212 Return of Site Fee

a) Any air pollution site fee remitted to the Agency in an incorrect amount shall be returned to the owner or operator within 15 days of receipt.

b) If return of any air pollution site fee is made pursuant to subsection (a), the due date of payment included on the billing statement remains the date on which payment is due.

c) If the Agency fails to return any air pollution site fee remitted in an incorrect amount within 15 days of receipt, the due date of payment shall be extended for the number of days by which the 15 day return period has been exceeded.

Section 251.215 Prohibition Against Refund

Any air pollution site fee remitted to the Agency in a correct amount shall not be refunded at any time or for any reason, either in part or in full.

SUBPART C: RESOLUTION OF DISPUTES

Section 251.301 Request for Reconsideration

a) The owner or operator of a site may request reconsideration of the amount of the air pollution site fee determined by the Agency within 30 days of issuance of a billing statement. Failure to request reconsideration within this period shall constitute waiver of all rights to seek reconsideration of the amount from the Agency and may result in waiver of right to appeal pursuant to Section 251.310.

b) All requests for reconsideration shall be in writing and shall include all pertinent facts and arguments in support of the request. Such requests shall be addressed to:

Division of Air Pollution Control, Permit Section
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

Section 251.305 Effect of Request for Reconsideration

The submission of a request for reconsideration to the Agency shall automatically stay the due date of payment to a date 30 days subsequent to final Agency action on the request for reconsideration.

Section 251.308 Agency Response

The Agency shall respond in writing to any request for reconsideration pursuant to Section 251.305 within 30 days of receipt of the request. Such written response shall constitute final Agency action. Failure by the Agency to respond within 30 days of receipt of the request shall be considered a denial of the request and shall also constitute final Agency action.

Section 251.310 Appeal of Final Agency Action

The owner or operator of a site may appeal the Agency's determination of the air pollution site fee pursuant to the Administrative Review Act (Ill. Rev. Stat., 1985, ch. 110, pars. 3-101, et seq.).

2580e/typesetting

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-2113

OPERATING PERMIT

PERMITTEE

J.L. Clark Manufacturing Co.
Attention: Joseph F. Newman
2300 6th Street
Rockford, Illinois 61101

Application No.: 73030535 I.D. No.: 043030AAR
Applicant's Designation: 3499 Date Received: December 18, 1984
Subject: Lead and Aluminum Deco Collapsible Tubes
Date Issued: January 23, 1985 Expiration Date: January 17, 1990
Location: 2300 Wisconsin Avenue, Downers Grove, Illinois

Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of annealing ovens (aluminum lines) -4 elec. +5 gas, roller coaters (aluminum lines), curing ovens on coaters (aluminum lines), printers (aluminum lines), curing ovens for printers (aluminum lines), 2 internal tube lining machines (aluminum lines), 2 curing ovens for internal coaters (aluminum), lead remelt furnace, roller coaters -- only 1 used (lead lines), ovens for coaters and printers (lead lines) and printers -- only 2 used lead lines as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1. Emissions of volatile organic material from the above-referenced facility shall not exceed 25 tons per year in the absence of air pollution control equipment. This condition is required to meet the exemption limit specified in 35 Ill. Adm. Code 215.206(a) (formerly Rule 205(n)(3)(A)).

2. Records of solvent purchase and use that will enable the Agency to verify this limit must be maintained for two years. These records shall be made available to the Agency upon request.

B. Mathur

Bharat Mathur, P.E.
Manager, Permit Section
Division of Air Pollution Control

BM:MMA:sd/166e/16

cc: Region 1

J. L. Clark-Tube Division
Operating Permit Renewal

ID #043030AAR
Permit #73030535

COATING & SOLVENT CALCULATION DETAIL

Material	VOM (lb/gal)	Wt/Gal	Consumed Winter	VOM	Consumed Summer	VOM	75% Control VOM	81% Control VOM	Consume Total	TOTAL UNCONTR VOM	TOTAL VOM
Coatings											
6.16 H-23 Gold Lining 86.55	6.16	7.51	685	4219.6	744	4583.04	1145.76	870.78	1429	8802.64	5365.36
3164 Clear Coating	6.29	8.05	0	0	25	157.25	39.31	29.88	25	157.25	39.31
3817 Peel Coating 69.99	6.70	9.57	22	147.4	24	160.8	40.20	30.55	46	308.20	187.60
VY8M82026 Yellow 62.96	7.36	11.69	47	345.92	31	228.16	57.04	43.35	78	574.08	402.96
XR 1215 Lining 85.50	6.90	8.07	31	213.9	14	96.6	24.15	18.35	45	310.50	238.05
10-084A Lining	5.51	7.49	415	2286.65	470	2589.7	647.43	492.04	885	4876.35	2934.08
G72-WC-18 White 63.1	7.29	11.56	2041	14878.89	2481	18086.49	4521.62	3436.43	4522	32965.38	19400.51
379W67 White 36.88	4.52	12.49	440	1988.8	1894	8560.88	2140.22	1626.57	2334	10549.68	4129.02
IT-404-077 Lining 34% [illegible]	5.41	8.2	110	595.1	105	568.05	142.01	107.93	215	1163.15	737.11
SUBTOTAL				24676.26		35030.97	8757.743	6655.884		59707.23	33434.00
Cleaning Solvent											
660 Solvent	7.02	7.02	1300	9126	1477	10368.54			2777	19494.54	19494.54
Thinners											
MEK	6.07	6.07	2552	15490.64	2984	18112.88	4528.22	3441.45	5536	33603.52	20018.86
Mineral Spirits	6.49	6.49	20	129.8	28	181.72	45.43	34.53	48	311.52	175.23
Glycol Ether DB	8.15	8.15	128	1043.2	578	4710.7	1177.68	895.03	706	5753.90	2220.88
Glycol Ether EB	7.84	7.84	85	666.4	314	2461.76	615.44	467.73	399	3128.16	1281.84
2300 Vinyl	7.62	7.62	73	556.26	132	1005.84	251.46	191.11	205	1562.10	807.72
SUBTOTAL				27012.3		36841.44	6618.225	5029.851		63853.74	43999.07
Less Solvent Disposed	7.02	7.02							924	6486.48	6486.48
TOTAL UNCONTROLLED VOM										117074.5	70946.59

Note 76.50 kg wt } % solids
61.38 kg vol }
Voc = 2.9 lb/gal
wt/gal = 12.36

J. L. Clark-Tube Division
Operating Permit Renewal

calculated per 28.206

calculated per 218.

Material	VOMa (lb/gal)	C	D	1-(C/D)	S C/1-(C/D	VOM1 (lbs/gal)	E=[(VOMa
Coatings							
H-23 Gold Lining	6.16	0.36	6.16	0.94	0.38	0.38	93.79
3164 Clear Coating	6.29	0.36	6.29	0.94	0.38	0.38	93.93
3817 Peel Coating	6.70	0.36	6.70	0.95	0.38	0.38	94.32
VY8M82026 Yellow	7.36	0.36	7.36	0.95	0.38	0.38	94.86
XR 1215 Lining	6.90	0.36	6.90	0.95	0.38	0.38	94.50
10-084A Lining	5.51	0.36	5.51	0.93	0.39	0.39	93.01
G72-WC-18 White	7.29	0.36	7.29	0.95	0.38	0.38	94.81
379W67 White	4.52	0.36	4.52	0.92	0.39	0.39	91.35
IT-404-077 Lining	5.41	0.36	5.41	0.93	0.39	0.39	92.87

State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director
2200 Churchill Road, Springfield, IL 62794-9276

APPLICATION FOR PERMIT RENEWAL/OPERATING PERMIT

FEBRUARY 01, 1994 217/782-2113

APPLICATION NO: 73030535
ID NUMBER: 043030AAR 3503A
OPERATION OF:
ALUMINUM TUBE LINKS
LOCATION:
J L CLARK MFG CO - ATLAS TUBE DIV
2300 WISCONSIN AVE
DOWNERS GROVE IL 60515

J L CLARK MANUFACTURING CO
ATTN: JAMES K. KLOTZ CHEIF CHEMIST
2300 6TH ST
ROCKFORD IL 61101

THE ABOVE REFERENCED OPERATING PERMIT WILL EXPIRE ON JULY [illegible] THE AGENCY RECOMMENDS THAT YOU APPLY FOR A RENEWAL OF THIS OPERATING PERMIT AT LEAST NINETY (90) DAYS PRIOR TO ITS EXPIRATION.

IF YOUR OPERATION IS UNCHANGED, YOU MAY REQUEST TO RENEW YOUR [illegible] SIGNING IN THE SPACE PROVIDED BELOW, KEEPING ONE COPY FOR YOUR [illegible] RETURNING THIS CORRESPONDENCE TO THE AGENCY. IF DATED AND [illegible]

AGENCY THIS APPLICATION WILL BE RETURNED TO YOU AND WILL BE [illegible]

IF THERE HAS BEEN A CHANGE OF ADDRESS, PLEASE INDICATE [illegible] THE ABOVE INFORMATION. IF THERE HAS BEEN A CHANGE OF [illegible] PROPER DOCUMENTATION MUST BE SUBMITTED TO ALLOW TRANSFER [illegible] IF YOUR OPERATION HAS CHANGED FROM THAT DESCRIBED IN THE [illegible] FILED WITH THIS AGENCY, THEN YOU MUST USE APPROPRIATE FORMS TO [illegible] ALL CHANGES AS PART OF THE APPLICATION. (SEE ENCLOSED "REQUEST [illegible] FORMS" APC-209).

IF THE OPERATION HAS BEEN PERMANENTLY DISCONTINUED, PLEASE SEND [illegible] TO THE AGENCY WITHDRAWING THIS PERMIT. IF THE OPERATION HAS [illegible] IN ANOTHER PERMIT, PLEASE PROVIDE THE PERMIT NUMBER OF THE NEW [illegible] AND A LETTER OF EXPLANATION.

I CERTIFY THAT THE ORIGINAL PERMIT INFORMATION REMAINS TRUE, [illegible] CURRENT AND THAT I AM AUTHORIZED TO EXECUTE THIS APPLICATION FOR [illegible] RENEWAL.

Gordon E. Van Wagner 5/1/94
SIGNATURE DATE PRINTED NAME AND TITLE OF SIGNER

FOR AGENCY USE ONLY

PERMIT EXPIRATION DATE:

PERMIT IS GRANTED TO OPERATE THE ABOVE REFERENCED EQUIPMENT SUBJECT TO STANDARD CONDITIONS ATTACHED HERETO AND ANY SPECIAL CONDITIONS OF THE PREVIOUSLY GRANTED OPERATING PERMIT.

DONALD E. SUTTON, P.E.
MANAGER, PERMIT SECTION
DIVISION OF AIR POLLUTION CONTROL

[illegible] SECTION 1[illegible]

J.L.CLARK
a member of the CLARCOR consumer products group

July 21, 1993

Ms. Mary Meyer
State of Illinois
Environmental Protection Agency
Division of Legal Counsel
2200 Churchill Road
Springfield, IL 62794-9276

Certified Mail
P 295 696 444

Dear Ms. Meyer:

Following up our prior phone conversation, we have been in contact with David Hulskotter in the permit division regarding our application for operating permit for J. L. Clark - Tube Division in Downers Grove, ID #043030AAR. As indicated in the Notice of Incompleteness, we have submitted several facsimile communications to Mr. Hulskotter to address the deficiencies.

Item #3 in the letter was updated per the request to indicate the emissions points and those that are controlled by our thermal oxidizer. We have gone through several steps to calculate the overall efficiency for the facility. In our initial conversation with Mr. Hulskotter we had agreed to issuance of a temporary operating permit which would require emissions testing, if we could not demonstrate to his satisfaction our ability to satisfy the requirements for overall destruction efficiency.

As of today's conversation, Mr. Hulskotter has indicated that our calculations suggest compliance with Section 218.207(b)(2) and that we can limit our emissions to satisfy this condition rather than conduct an emissions test. Mr. Hulskotter further confirmed that the facsimile copies were sufficient for him to finalize issuance of an operating permit. As you had requested to be copied on the cover letter of our resubmission, we trust that this summary will adequately update you on the status of this permit renewal. Should you have any questions, please contact me or Gordon VerWeyst at (815)962-8861.

Sincerely,

James K. Klotz
Environmental Engineer

cc: Gordon VerWeyst

2300 Sixth Street, P.O. Box 7000
Rockford, Illinois 61125

815/962-8861
FAX: 815/962-6356

Illinois Environmental Protection Agency · P. O. Box 19276, Springfield, IL 62794-9276

217/782-2113

OPERATING PERMIT

RECEIVED CLARCOR ROCKFORD, ILL. DEC 12 9 11 AM '88

PERMITTEE

J.L. Clark
Attn: James K. Klotz, Chief Chemist
2300 Sixth Street
Rockford, Illinois 61104

Application No.: 73030535
I.D. No.: 043030AAR
Applicant's Designation:
Date Received: September 26, 1988
Subject: Aluminum & Lead Tube Lines
Date Issued: December 7, 1988
Expiration Date: September 30, 1992
Location: 2300 Wisconsin Avenue, Downers Grove

Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of a new Hinterkopf line consisting of an extrusion press, an annealing oven, a roller coater & printer and a curing oven, 9 existing annealing ovens (8 electric & 1 gas), 9 existing roller coaters for aluminum lines, 9 existing printers, 9 curing ovens for printers, and coaters (4 electric and 5 gas) 3 internal tube lining machines, 3 curing ovens for internal coaters, a lead remelt furnace, 3 existing roller coaters for lead lines, 3 ovens for lead line coaters & printers and a fume incinerator as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1. Emissions of nitrogen oxides from the annealing oven and the curing oven of the Hinterkopf line shall not exceed 0.3 ton per year. This limit is based on maximum heat input rate, 6000 hours of operation per year and the standard emission factors for natural gas combustion.

2. Emission of organic materials from the Hinterkopf line shall not exceed 2.5 ton per year. This limit is based on maximum uncontrolled emissions of 4.0 tons/year, 75 percent overall control efficiency of the fume incinerator and the capture system and allowance provided in the condition #9 of this permit.

3. The Permittee shall maintain the fume incinerator combustion chamber temperature at the manufacturer's recommended level but not lower than 1400°F.

4a. This permit authorizes operation of coating lines other than the new Hinterkopf line based on an ongoing demonstration of compliance with Section 215.207, "Aggregation of Emission Sources," in that the Agency has approved the methods or procedures to be used to determine emissions pursuant to this Section. Pursuant to this Section, on each day the actual emissions of volatile organic material (VOM) shall be less than the allowable emissions, as determined for that day. The methods or procedures used to determine emissions of volatile organic material shall be in accordance with any procedures described in the application and the conditions of this permit.

b. The Permittee shall calculate daily allowable emissions by taking the product of the actual volume of solids in the coating for the day, in accordance with Section 215.207(b) and the applicable emission limit of Section 215.204(b) converted to pound of VOM/gallon coating solids, using the density of the solvent in the coating, and the actual volume of solids in the coating for the day.

c. The Permittee shall calculate actual emissions for a coating line assuming the overall 95% destruction of VOM represented in the application, for the combination of the capture system and afterburner, only if they are operated as described in the permit application, with a minimum afterburner temperature of 1400 degrees Fahrenheit. The afterburner combustion chamber shall be heated to this temperature before beginning operation of a coating line controlled by the afterburner.

5. The afterburner shall be equipped with a continuous temperature indicator and an alarm system which shall activate a horn located in the production area if the temperature drops below 1400°F.

6a. The Permittee shall maintain daily compliance records for the existing coating lines if operating pursuant to Section 215.207, including:

i) for each coating line, the name and volume of each coating used (gallon), the VOM content (pound/gallon), the solids content (volume %), the actual VOM emissions (pound) and the allowable VOM emissions (pound). All the above shall exclude any water or exempt compounds in the coating.

ii) the operating temperature of the afterburner(s) (Fahrenheit) recorded once every 4 hours when the indicating temperature is above 1400°F and recorded every 5 minutes when the temperature falls below 1400°F.

iii) the aggregate actual and allowable emissions (pounds/day).

b. The Permittee shall maintain monthly records for the new Hinterkopf line and the existing lines including:

i) the coatings used on the line

ii) the VOM emissions.

c. These records shall be retained for a period of two years and shall be available to the Agency for inspection.

7a. An annual report shall be sent to the Agency summarizing VOM emissions and compliance with Section 215.207 including:

i) For lines operating pursuant to Section 215.207:

A) total VOM emissions (pound).
B) average daily actual and allowable VOM emissions (pounds/operating day).
C) sample compliance calculations for one actual day.
D) days in which the actual emissions exceeded the allowable with date, actual and allowable emissions, cause of exceedance, and corrective action, if any.

ii) For the new Hinterkopf line and existing lines the annual VOM emissions with supporting calculations.

b. These reports shall be sent beginning January 1, 1989 no later than 20 days after the end of the reporting period to the Permit Section and:

Illinois Environmental Protection Agency
Division of Air Pollution Control
The Intercontinental Center
1701 First Avenue
Maywood, IL 60153

8. Operation of the coating & printing lines is not permitted during malfunction and breakdown of the fume incinerator because compliance with 35 Ill. Adm. Code 201.262 has not been demonstrated.

9. Pursuant to 35 Ill. Adm. Code 215.106, if odor nuisance or threat to human health does not exist, the Permittee need not operate the catalytic afterburner during any time between November 1 of any year to April 1 of the following year during which an ozone advisory, alert or emergency has not been declared pursuant to 35 Ill. Adm. Code 244. If odor nuisance exists or there is a threat to public health, operation of the catalytic afterburner is required to control the emissions of the printing presses.

Terry A. Sweitzer

Terry A. Sweitzer, P.E.
Manager, Permit Section
Division of Air Pollution Control

TAS:VVG:mab/5308H/59-62

cc: Region 1

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62706

STANDARD CONDITIONS FOR OPERATING PERMITS

July 1, 1985

The Illinois Environmental Protection Act (Illinois Revised Statutes, Chapter 111-1/2, Section 1039) grants tl Environmental Protection Agency authority to impose conditions on permits which it issues.

The following conditions are applicable unless superseded by special permit condition(s).

1. The issuance of this permit does not release the permittee from compliance with state and federal regulation which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulation of the United States or the State of Illinois or with applicable local laws, ordinances and regulations.

2. The Agency has issued this permit based upon the information submitted by the permittee in the permit application. Any misinformation, false statement or mispresentation in the application shall be grounds for revocation under 35 Ill. Adm. Code 201.207.

3. a. The permittee shall not authorize, cause, direct or allow any modification, as defined in 35 Ill. Adm. Code 201.102, of equipment, operations or practices which are reflected in the permit application as submitted unless a new application or request for revision of the existing permit is filed with the Agency and unless a new permit or revision of the existing permit(s) is issued for such modification.

   b. This permit only covers emission sources and control equipment while physically present at the indicated plant location(s). Unless the permit specifically provides for equipment relocation, this permit is void for an item of equipment on the day it is removed from the permitted location(s) or if all equipment is removed, notwithstanding the expiration date specified on the permit.

4. The permittee shall allow any duly authorized agent of the Agency, upon the presentation of credentials, at reasonable times:

   a. to enter the permittee's property where actual or potential effluent, emission or noise sources are located or where any activity is to be conducted pursuant to this permit,

   b. to have access to and to copy any records required to be kept under the terms and conditions of this permit,

   c. to inspect, including during any hours of operation of equipment constructed or operated under this permit, such equipment and any equipment required to be kept, used, operated, calibrated and maintained under this permit,

   d. to obtain and remove samples of any discharge or emission of pollutants, and

   e. to enter and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring or recording any activity, discharge or emission authorized by this permit.

5. The issuance of this permit:

   a. shall not be considered as in any manner affecting the title of the premises upon which the permitted facilities are located,

   b. does not release the permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the facilities,

c. does not take into consideration or attest to the structural stability of any unit or part of the project,

d. in no manner implies or suggests that the Agency (or its officers, agents or employees) assumes any liab directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the prop equipment or facility.

6. The facilities covered by this permit shall be operated in such a manner that the disposal of air contamin collected by the equipment shall not cause a violation of the Environmental Protection Act or regulat promulgated thereunder.

7. The permittee shall maintain all equipment covered under this permit in such a manner that the performanc such equipment shall not cause a violation of the Environmental Protection Act or regulations promulga thereunder.

8. The permittee shall maintain a maintenance record on the premises for each item of air pollution cont equipment. This record shall be made available to any agent of the Environmental Protection Agency at any ti during normal working hours and/or operating hours. As a minimum, this record shall show the dates performance and nature of preventative maintenance activities.

9. No person shall cause or allow continued operation during malfunction, breakdown or startup of any emissi source or related air pollution control equipment if such operation would cause a violation of an applicab emission standard or permit limitation. Should a malfunction, breakdown or startup occur which results i emissions in excess of any applicable standard or permit limitation, the permittee shall:

a. immediately report the incident to the Agency's Regional Field Operations Section Office by telephon telegraph, or other method as constitutes the fastest available alternative, and shall comply with al reasonable directives of the Agency with respect to the incident;

b. maintain the following records for a period of no less than two (2) years:

i. date and duration of malfunction, breakdown or startup,

ii. full and detailed explanation of the cause,

iii. contaminants emitted and an estimate of quantity of emissions,

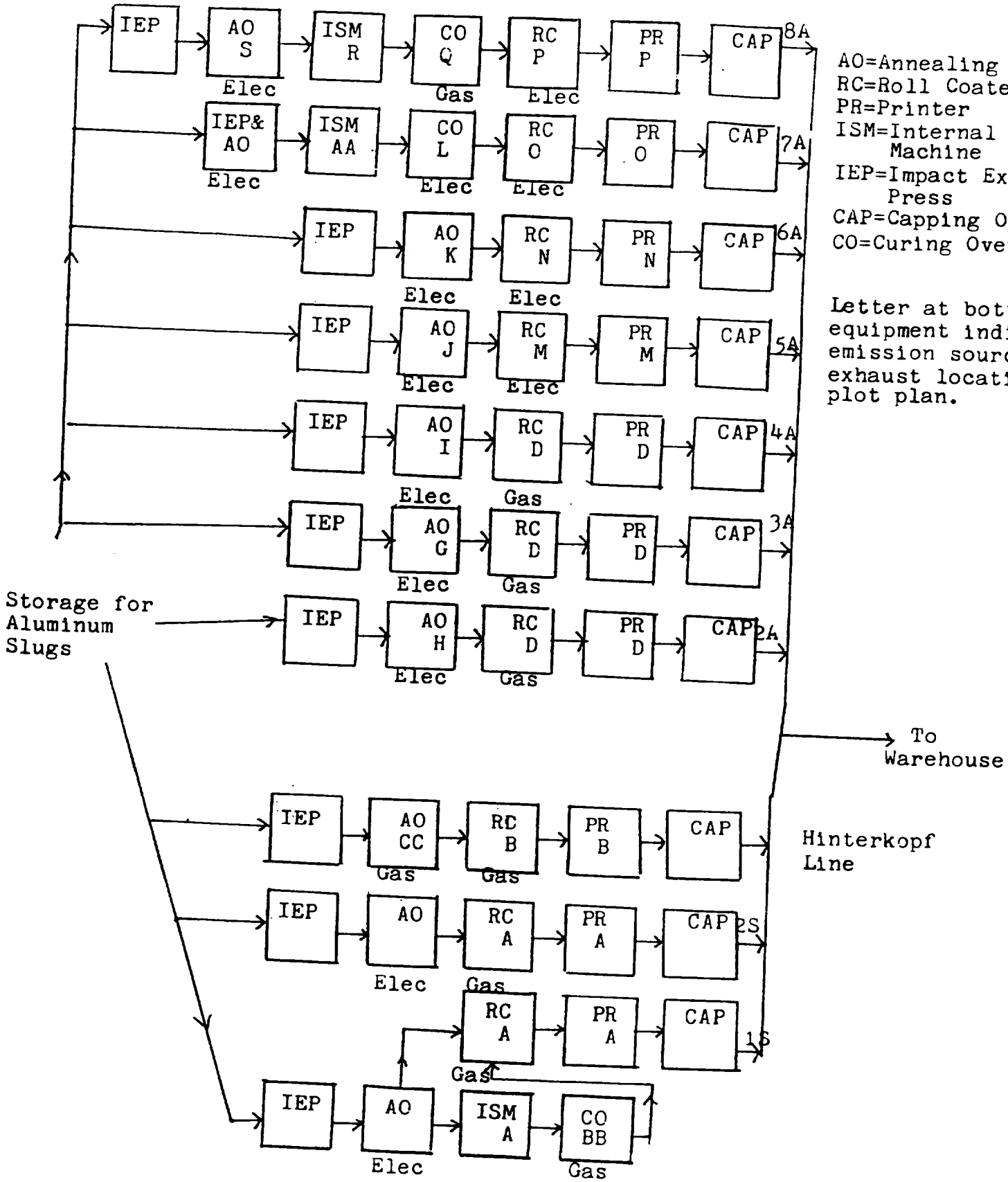
iv. measures taken to minimize the amount of emissions during the malfunction, breakdown or startup, and

v. measures taken to reduce future occurrences and frequency of incidents.

10. If the permit application contains a compliance program and project completion schedule, the permittee shall submit a project completion status report within thirty (30) days of any date specified in the compliance program and project completion schedule or at six month intervals, whichever is more frequent.

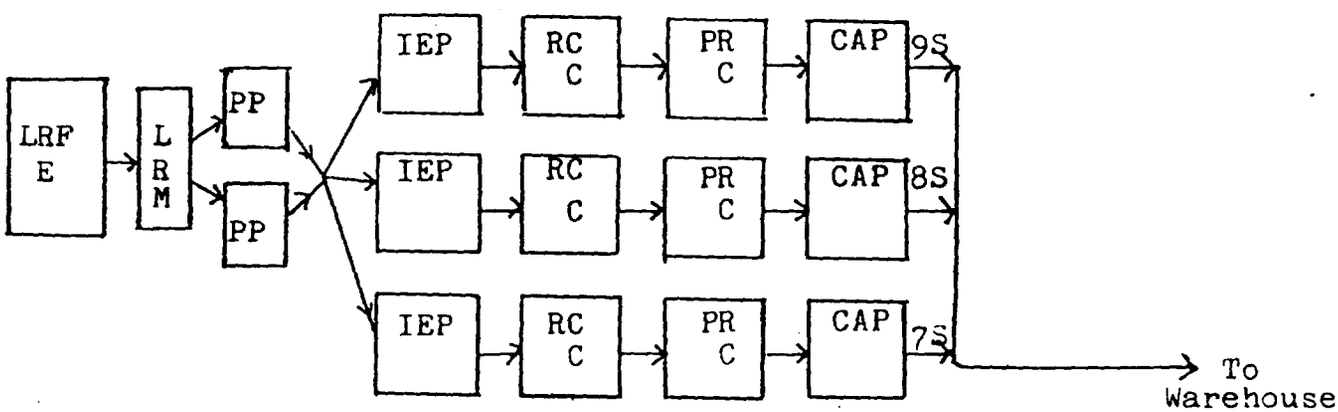
11. Beginning one year from the date of this permit the permittee shall submit an "Annual Emission Report," form APC-208, as required by 35 Ill. Adm. Code 201.302. (Note: If the permittee has other operating permits for this facility, the "Annual Emission Report" for all such permits may be included in a single annual submission.)

J. L. CLARK - ATLAS TUBE DIVISION
FLOW DIAGRAM
ALUMINUM LINES



J. L. CLARK - ATLAS TUBE DIVISION
FLOW DIAGRAM

LEAD LINES



Oven in use for all 3 lines is gas.

LRF = Lead Remelt Furnance
LRM = Lead Rolling Mill
PP = Lead Slug Press
IEP = Impact Extrusion Press
RC = Roll Coater
PR = Printer
CAP = Capping Operation

Letter at bottom of equipment indicates emission source exhaust location on plot plan.

J.L.CLARK
a member of the CLARCOR packaging products group

P 727 396 551
CERTIFIED MAIL

April 19, 1988

Mr. Terry Sweitzer
Manager, Permit Section
Illinois Environmental Protection Agency
Division of Air Pollution Control
2200 Churchill Road
Springfield, Illinois 62706

Dear Mr. Sweitzer:

Enclosed are three copies of permit applications for construction and operating permits for our facility, J. L. Clark - Atlas Tube Division, 2300 Wisconsin Avenue, Downers Grove, Illinois 60515. These applications are for construction and operating permits for a new production line identified as the Hinterkopf line and for construction and operation of a thermal oxidizer for this facility.

In preparation for the new production line, J. L. Clark made a thorough review of coating materials and anticipated air emissions. From this study, we identified the increasing potential to exceed the 25 ton ceiling included in our current operating permit 73030535. With the new production line and increasing business expectations, on February 17, 1988, J. L. Clark issued a purchase order to Smith Environmental Corporation of Duarte, California for a 10,000 SCFM Thermal Oxidizer. This decision was consistent with our strategic plan to maintain environmental compliance for our facilities.

Due to customer requirements, we anticipate starting the Hinterkopf line for production on May 16, 1988. As part of this permit, we have presented a summary of current air emissions and our expectations for all of 1988. Based on this review and our thermal oxidizer installation in July, we feel that emissions from this facility will be maintained below our 25 ton ceiling which is now in existence. For this reason, we request as a condition of our operating permit for the Hinterkopf line that the facility be permitted to operate this line prior to the installation and operation of the thermal oxidizer.

2300 Sixth Street, P.O. Box 7000
Rockford, Illinois 61125

815/962-8861
FAX: 815/962-6356

J.L. CLARK
a member of the CLARCOR packaging products group

We would also request consolidation of permits as the Agency feels this is best accomplished. Should you have any questions on the permit applications and attachments, please contact James K. Klotz, 815/962-8861, for clarification and further information.

We appreciate your prompt review of the enclosed permit applications.

Sincerely,

Ronald A. Moreau

Ronald A. Moreau
Vice President - Manufacturing
/elm

Enclosures

bcc: Jim Klotz✓
Gordon VerWeyst
Dick Anderson
Dick Malmgren

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62706

This Agency is authorized to require this information ur Illinois Revised Statutes, 1979, Chapter III 1/2, Section I Disclosure of this information is required under that Sec Failure to do so may prevent this form from being proc and could result in your application being denied. This f has been approved by the Forms Management Center.

APPLICATION FOR A PERMIT (A)

☒ CONSTRUCT ☒ OPERATE

NAME OF EQUIPMENT TO BE CONSTRUCTED OR OPERATED Smith Environmental Thermal Oxidizer (B)

FOR AGENCY USE ONLY

I. D. NO. _____

PERMIT NO. _____

DATE _____

1a. NAME OF OWNER: CLARCOR, Inc.		2a. NAME OF OPERATOR: J. L. Clark	
1b. STREET ADDRESS OF OWNER: 2323 Sixth Street		2b. STREET ADDRESS OF OPERATOR: 2300 Sixth Street	
1c. CITY OF OWNER: Rockford		2c. CITY OF OPERATOR: Rockford	
1d. STATE OF OWNER: IL	1e. ZIP CODE: 61104	2d. STATE OF OPERATOR: IL	2e. ZIP CODE: 61104

3a. NAME OF CORPORATE DIVISION OR PLANT: Atlas Tube Division		3b. STREET ADDRESS OF EMISSION SOURCE: 2300 Wisconsin Avenue		
3c. CITY OF EMISSION SOURCE: Downers Grove	3d. LOCATED WITHIN CITY LIMITS: ☒ YES ☐ NO	3e. TOWNSHIP: Lisle	3f. COUNTY: DuPage	3g. ZIP CODE: 60515

4. ALL CORRESPONDENCE TO: (TITLE AND/OR NAME OF INDIVIDUAL) James K. Klotz/Chief Chemist	5. TELEPHONE NUMBER FOR AGENCY TO CALL: 815/962-8861
6. ADDRESS FOR CORRESPONDENCE: (CHECK ONLY ONE) ☐ OWNER: ☒ OPERATOR ☐ EMISSION SOURCE	7. YOUR DESIGNATION FOR THIS APPLICATION: (C) 3 5 0 1 _ _ _ _ _ _

8. THE UNDERSIGNED HEREBY MAKES APPLICATION FOR A PERMIT AND CERTIFIES THAT THE STATEMENTS CONTAINED HEREIN ARE TRUE AND CORRECT, AND FURTHER CERTIFIES THAT ALL PREVIOUSLY SUBMITTED INFORMATION REFERENCED IN THIS APPLICATION REMAINS TRUE, CORRECT AND CURRENT. BY AFFIXING HIS SIGNATURE HERETO HE FURTHER CERTIFIES THAT HE IS AUTHORIZED TO EXECUTE THIS APPLICATION.

AUTHORIZED SIGNATURE(S): (D)

BY [signature] SIGNATURE — 4/19/88 DATE	BY Ronald A Moreau SIGNATURE — 4/18/88 DATE
Richard W. Malmgren — TYPED OR PRINTED NAME OF SIGNER	Ronald A. Moreau — TYPED OR PRINTED NAME OF SIGNER
Executive Vice President — TITLE OF SIGNER	Vice President - Manufacturing — TITLE OF SIGNER

(A) THIS FORM IS TO PROVIDE THE AGENCY WITH GENERAL INFORMATION ABOUT THE EQUIPMENT TO BE CONSTRUCTED OR OPERATED. THIS FORM MAY ONLY BE USED TO REQUEST ONE TYPE OF PERMIT - CONSTRUCTION OR OPERATION - AND NOT BOTH.

(B) ENTER THE GENERIC NAME OF THE EQUIPMENT TO BE CONSTRUCTED OR OPERATED. THIS NAME WILL APPEAR ON THE PERMIT WHICH MAY BE ISSUED PURSUANT TO THIS APPLICATION. THIS FORM MUST BE ACCOMPANIED BY OTHER APPLICABLE FORMS AND INFORMATION.

(C) PROVIDE A DESIGNATION IN ITEM 7 ABOVE WHICH YOU WOULD LIKE THE AGENCY TO USE FOR IDENTIFICATION OF YOUR EQUIPMENT. YOUR DESIGNATION WILL BE REFERENCED IN CORRESPONDENCE FROM THIS AGENCY RELATIVE TO THIS APPLICATION. YOUR DESIGNATION MUST NOT EXCEED TEN (10) CHARACTERS.

(D) THIS APPLICATION MUST BE SIGNED IN ACCORDANCE WITH PCB REGS., CHAPTER 2, PART 1, RULE 103(a)(4) OR 103(b)(5) WHICH STATES: "ALL APPLICATIONS AND SUPPLEMENTS THERETO SHALL BE SIGNED BY THE OWNER AND OPERATOR OF THE EMISSION SOURCE OR AIR POLLUTION CONTROL EQUIPMENT, OR THEIR AUTHORIZED AGENT, AND SHALL BE ACCOMPANIED BY EVIDENCE OF AUTHORITY TO SIGN THE APPLICATION."

IF THE OWNER OR OPERATOR IS A CORPORATION, SUCH CORPORATION MUST HAVE ON FILE WITH THE AGENCY A CERTIFIED COPY OF A RESOLUTION OF THE CORPORATION'S BOARD OF DIRECTORS AUTHORIZING THE PERSONS SIGNING THIS APPLICATION TO CAUSE OR ALLOW THE CONSTRUCTION OR OPERATION OF THE EQUIPMENT TO BE COVERED BY THE PERMIT.

9. DOES THIS APPLICATION CONTAIN A PLOT PLAN/MAP:

☒ YES ☐ NO

IF A PLOT PLAN/MAP HAS PREVIOUSLY BEEN SUBMITTED, SPECIFY:

AGENCY I.D. NUMBER 0 4 3 0 3 0 A A R APPLICATION NUMBER 7 3 0 3 0 5 3 5

IS THE APPROXIMATE SIZE OF APPLICANT'S PREMISES LESS THAN 1 ACRE?

☐ YES ☒ NO: SPECIFY 4.4 ACRES

10. DOES THIS APPLICATION CONTAIN A PROCESS FLOW DIAGRAM(S) THAT ACCURATELY AND CLEARLY REPRESENTS CURRENT PRACTICE.

☒ YES ☐ NO

11a. WAS ANY EQUIPMENT, COVERED BY THIS APPLICATION, OWNED OR CONTRACTED FOR, BY THE APPLICANT PRIOR TO APRIL 14, 1972:

☐ YES ☒ NO

IF "YES", ATTACH AN ADDITIONAL SHEET, EXHIBIT A, THAT:
(a) LISTS OR DESCRIBES THE EQUIPMENT
(b) STATES WHETHER THE EQUIPMENT WAS IN COMPLIANCE WITH THE RULES AND REGULATIONS GOVERNING THE CONTROL OF AIR POLLUTION PRIOR TO APRIL 14, 1972.

11b. HAS ANY EQUIPMENT, COVERED BY THIS APPLICATION, NOT PREVIOUSLY RECEIVED AN OPERATING PERMIT:

☒ YES ☐ NO

IF "YES", ATTACH AN ADDITIONAL SHEET, EXHIBIT B, THAT:
(a) LISTS OR DESCRIBES THE EQUIPMENT
(b) STATES WHETHER THE EQUIPMENT
(i) IS ORIGINAL OR ADDITIONAL EQUIPMENT
(ii) REPLACES EXISTING EQUIPMENT, OR
(iii) MODIFIES EXISTING EQUIPMENT
(c) PROVIDES THE ANTICIPATED OR ACTUAL DATES OF THE COMMENCEMENT OF CONSTRUCTION AND THE START-UP OF THE EQUIPMENT

12. IF THIS APPLICATION INCORPORATES BY REFERENCE A PREVIOUSLY GRANTED PERMIT(S), HAS FORM APC-210, "DATA AND INFORMATION--INCORPORATION BY REFERENCE" BEEN COMPLETED.

☒ YES ☐ NO

APPLICATION FOR OPERATING PERMIT ONLY

13. DOES THE STARTUP OF AN EMISSION SOURCE COVERED BY THIS APPLICATION PRODUCE AIR CONTAMINANT EMISSION IN EXCESS OF APPLICABLE STANDARDS:

☐ YES ☒ NO

IF "YES," HAS FORM APC-203, "OPERATION DURING STARTUP" BEEN COMPLETED FOR THIS SOURCE:

☐ YES ☐ NO

14. DOES THIS APPLICATION REQUEST PERMISSION TO OPERATE AN EMISSION SOURCE DURING MALFUNCTIONS OR BREAKDOWNS:

☒ YES ☐ NO

IF "YES," HAS FORM APC-204, "OPERATION DURING MALFUNCTION AND BREAKDOWN" BEEN COMPLETED FOR THIS SOURCE:

☒ YES ☐ NO

15. IS AN EMISSION SOURCE COVERED BY THIS APPLICATION SUBJECT TO A FUTURE COMPLIANCE DATE:

☐ YES ☒ NO

IF "YES," HAS FORM APC-202, "COMPLIANCE PROGRAM & PROJECT COMPLETION SCHEDULE," BEEN COMPLETED FOR THIS SOURCE:

☐ YES ☐ NO

16. DOES THE FACILITY COVERED BY THIS APPLICATION REQUIRE AN EPISODE ACTION PLAN (REFER TO GUIDELINES FOR EPISODE ACTION PLANS):

☐ YES ☒ NO

17. WAS THIS OPERATION THE SUBJECT OF A VARIANCE PETITION FILED WITH THE ILLINOIS POLLUTION CONTROL BOARD ON OR BEFORE JUNE 13, 1972:

☐ YES ☒ NO

IF "YES," CITE: PCB NUMBER(S) _____, DATE OF BOARD ORDER _____

WAS CONSTRUCTION OR MODIFICATION OF EQUIPMENT, SUFFICIENT TO ACHIEVE COMPLIANCE WITH THE "RULES AND REGULATIONS GOVERNING THE CONTROL OF AIR POLLUTION" EFFECTIVE PRIOR TO APRIL 14, 1972, COMMENCED PRIOR TO APRIL 14, 1972:

☐ YES ☒ NO

IF "YES," EXPLAIN IN DETAIL, AND IDENTIFY EXPLANATION AS EXHIBIT D.

18. LIST AND IDENTIFY ALL FORMS, EXHIBITS, AND OTHER INFORMATION SUBMITTED AS PART OF THIS APPLICATION. INCLUDE THE PAGE NUMBERS ON EACH ITEM (ATTACH ADDITIONAL SHEETS IF NECESSARY):

See Table of Contents - Page 3

TOTAL NUMBER OF PAGES 37

EXHIBIT B

A) 10,000 SCFM Thermal Oxidizer with a nominal 80% effective primary heat exchanger (Smith Environmental Model 10080). This equipment will be fed through thirteen (13) exhaust ducts by a regulated damper system.

B) This equipment will be additional, except for the exhaust stacks that exit the roof which are existing. This will modify twelve (12) existing exhausts and one (1) exhaust from the new Hinterkopf production line included in another permit application. Currently, all these exhausts exit to atmosphere under the 25 ton ceiling of the current permits.

C) The Thermal Oxidizer is scheduled for delivery at the facility on July 1, 1988. It will take at least five (5) working days for the unit to be made operational. Anticipated start-up scheduled for the week of July 11, 1988.

STATE OF ILLINOIS
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SPRINGFIELD, ILLINOIS 62706

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DATA AND INFORMATION INCORPORATION BY REFERENCE	FOR AGENCY USE ONLY

THIS FORM IS TO BE USED TO INCORPORATE OR TRANSFER INFORMATION FROM ONE PERMIT APPLICATION TO ANOTHER, INCLUDING THE TRANSFER OF INFORMATION FROM A CONSTRUCTION PERMIT APPLICATION INTO AN OPERATING PERMIT APPLICATION. THIS FORM SHOULD ACCOMPANY THE APPLICATION INTO WHICH INFORMATION IS TO BE TRANSFERRED.

1. NAME OF OWNER: CLARCOR, Inc.		2. NAME OF CORPORATE DIV. OR PLANT (IF DIFFERENT FROM OWNER): J. L. Clark - Atlas Tube Division
3. STREET ADDRESS OF EMISSION SOURCE: 2300 Wisconsin Avenue	4. CITY OF EMISSION SOURCE: Downers Grove	5. IDENTIFICATION NUMBER: 043030AAR

6. APPLICATION NUMBER: 73030535

7. ☐ CONSTRUCTION ☒ OPERATION OF various emission sources

8. SHOULD ALL INFORMATION IN THIS APPLICATION BE INCORPORATED BY REFERENCE OR TRANSFERRED?
☒ YES ☐ NO
IF "NO", LIST ITEMS TO BE INCORPORATED:

9a. ITEM TO BE INCORPORATED:	b. PAGE:	c. FLOW DIAGRAM DESIGNATION (IF APPLICABLE):

10. DOES THE DATA & INFORMATION DESCRIBING THESE ITEMS REMAIN TRUE, CORRECT, CURRENT AND COMPLETE?
☒ YES ☐ NO
IF "NO", SUBMIT THE APPLICABLE FORMS AND CLEARLY STATE THE DATA AND INFORMATION WHICH IS NO LONGER TRUE, CORRECT, CURRENT AND COMPLETE.

11. APPLICATION NUMBER: 3500

12. ☒ CONSTRUCTION ☒ OPERATION OF Hinterkopf Aluminum Tube Line

13. SHOULD ALL INFORMATION IN THIS APPLICATION BE INCORPORATED BY REFERENCE OR TRANSFERRED?
☒ YES ☐ NO
IF "NO", LIST ITEMS TO BE INCORPORATED:

14a. ITEM TO BE INCORPORATED:	b. PAGE:	c. FLOW DIAGRAM DESIGNATION (IF APPLICABLE):

15. DOES THE DATA & INFORMATION DESCRIBING THESE ITEMS REMAIN TRUE, CORRECT, CURRENT AND COMPLETE?
☒ YES ☐ NO
IF "NO", SUBMIT THE APPLICABLE FORMS AND CLEARLY STATE THE DATA AND INFORMATION WHICH IS NO LONGER TRUE, CORRECT, CURRENT AND COMPLETE.

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This Agency is authorized to require this information under Illinois Revised Statutes, 1979, Chapter 111 1/2, Section 1039. Disclos of this information is required under that Section. Failure to do so r prevent this form from being processed and could result in your application being denied. This form has been approved by the Forr Management Center.

OPERATION DURING MALFUNCTION AND BREAKDOWN (WHERE OPERATION DURING MALFUNCTION OR BREAKDOWN EXCEEDS ALLOWABLE EMISSIONS)	FOR AGENCY USE ONLY

1. NAME OF PLANT OWNER: CLARCOR, Inc.	2. NAME OF CORPORATE DIVISION OR PLANT (IF DIFFERENT FROM OWNER): J. L. Clark - Atlas Tube Division
3. STREET ADDRESS OF EMISSION SOURCE: 2300 Wisconsin Avenue	4. CITY OF EMISSION SOURCE: Downers Grove

5. THE APPLICANT SHALL SUBMIT THE INFORMATION REQUESTED BY THIS FORM FOR EACH EMISSION SOURCE WHICH, DURING MALFUNCTION OR BREAKDOWN, MAY VIOLATE THE STANDARDS AND LIMITATIONS SET FORTH IN PCB REGS., CHAPTER 2, PART II.

6. FOR EACH SUCH EMISSION SOURCE AND DIRECTLY RELATED EQUIPMENT, SUBMIT THE FOLLOWING INFORMATION AND ATTACH TO THIS APPLICATION AS EXHIBIT F:

(a) DESCRIBE THE EXTENT TO WHICH DISCONTINUED OPERATION OF THIS EQUIPMENT WOULD: (A) CAUSE OR TEND TO CAUSE INJURY TO PERSONS OR SEVERE DAMAGE TO EQUIPMENT, OR (B) PREVENT THE APPLICANT FROM PROVIDING ESSENTIAL SERVICES TO THE PUBLIC.
(b) STATE THE ANTICIPATED LENGTH OF TIME THE EQUIPMENT WILL CONTINUE TO OPERATE DURING THE MALFUNCTION OR BREAKDOWN, INCLUDING AN EXPLANATION WHY THIS LENGTH OF TIME IS NECESSARY.
(c) DESCRIBE ALL MEASURES THE APPLICANT WILL TAKE TO MINIMIZE THE DURATION OF A MALFUNCTION OR BREAKDOWN.
(d) DESCRIBE ALL MEASURES THE APPLICANT WILL TAKE TO MINIMIZE THE QUANTITY OF AIR CONTAMINANT EMISSIONS THAT MAY OCCUR DURING A MALFUNCTION OR BREAKDOWN.
(e) IDENTIFY THE EMISSION SOURCE ON THE PROCESS FLOW DIAGRAM TO BE OPERATED DURING MALFUNCTION AND BREAKDOWN THAT EXCEEDS APPLICABLE STANDARDS AND LIMITATIONS.

TOTAL NUMBER OF PAGES IN EXHIBIT F: 3

ANALYSIS OF EXHAUST GAS TO THE AMBIENT AIR DURING MALFUNCTION AND BREAKDOWN

CONTAMINANT	CONCENTRATION	OR	EMISSION RATE	METHOD OF MEASURE AND ANALYSIS	METHOD OF MONITORING
7. CARBON MONOXIDE	a. PPM	b.	LB/HR	c.	d.
8. ORGANIC MATERIALS	a. PPM	b.	52.5 LB/HR	c. Mass Balance (Max.)	d. Mass Balance
9. HYDROGEN SULFIDE	a. PPM	b.	LB/HR	c.	d.
10. NITROGEN OXIDES	a. PPM	b.	LB/HR	c.	d.
11. SULFUR DIOXIDE	a. PPM	b.	LB/HR	c.	d.
12. PARTICULATE MATTER	a. GR/SCF	b.	LB/HR	c.	d.
13. OTHER (SPECIFY)	a. PPM	b.	LB/HR	c.	d.

14. EXIT GAS FLOW RATE: 12108 ACFM @ 260 °F

15. IF OTHER EMISSION SOURCES OR AIR POLLUTION CONTROL EQUIPMENT ARE EXHAUSTED THROUGH THE STACK OR VENT SERVING THE EQUIPMENT COVERED BY THIS APPLICATION, THE APPLICANT SHALL DEFINE THE EMISSIONS FROM SUCH OTHER EQUIPMENT AND ATTACH INFORMATION TO THIS APPLICATION AS EXHIBIT G.
TOTAL NUMBER OF PAGES IN EXHIBIT G: _____

STATE OF ILLINOIS
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2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62706

OPERATION DURING STARTUP (WHERE OPERATION DURING STARTUP EXCEEDS ALLOWABLE EMISSIONS)	FOR AGENCY USE ONLY

1. NAME OF PLANT OWNER:	2. NAME OF CORPORATE DIVISION OR PLANT (IF DIFFERENT FROM OWNER):
3. STREET ADDRESS OF EMISSION SOURCE:	4. CITY OF EMISSION SOURCE:
5. THE APPLICANT SHALL SUBMIT THE INFORMATION REQUESTED BY THIS FORM FOR EACH EMISSION SOURCE WHICH, DURING STARTUP, MAY VIOLATE THE STANDARDS AND LIMITATIONS SET FORTH IN PCB REGS., CHAPTER 2, PART II.	

6. FOR EACH SUCH EMISSION SOURCE AND DIRECTLY RELATED EQUIPMENT, SUBMIT THE FOLLOWING INFORMATION AND ATTACH TO THIS APPLICATION AS EXHIBIT E:

(a) DESCRIBE THE STARTUP PROCEDURE.
(b) DESCRIBE THOSE PROCEDURES THE APPLICANT WILL TAKE DURING STARTUP TO REDUCE THE EMISSIONS.
(c) DESCRIBE THE FREQUENCY AND DURATION OF STARTUPS.
(d) DESCRIBE ALL MEASURES THE APPLICANT WILL TAKE TO MINIMIZE THE FREQUENCY AND DURATION OF STARTUPS.
(e) IDENTIFY THE EMISSION SOURCE ON THE PROCESS FLOW DIAGRAM TO BE OPERATED DURING STARTUP THAT EXCEEDS APPLICABLE STANDARDS AND LIMITATIONS.

TOTAL NUMBER OF PAGES IN EXHIBIT E: _____

ANALYSIS OF EXHAUST GAS TO THE AMBIENT AIR DURING STARTUP

CONTAMINANT	CONCENTRATION	OR	EMISSION RATE	METHOD OF MEASURE AND ANALYSIS	METHOD OF MONITORING
7. CARBON MONOXIDE	a. PPM		b. LB/HR	c.	d.
8. ORGANIC MATERIALS	a. PPM		b. LB/HR	c.	d.
9. HYDROGEN SULFIDE	a. PPM		b. LB/HR	c.	d.
10. NITROGEN OXIDES	a. PPM		b. LB/HR	c.	d.
11. SULFUR DIOXIDE	a. PPM		b. LB/HR	c.	d.
12 PARTICULATE MATTER	a. GR/SCF		b. LB/HR	c.	d.
13. OTHER (SPECIFY)	a. PPM		b. LB/HR	c.	d.

14. EXHAUST GAS FLOW RATE:
_____ ACFM @ _____ °F

15. IF OTHER EMISSION SOURCES OR AIR POLLUTION CONTROL EQUIPMENT ARE EXHAUSTED THROUGH THE STACK OR VENT SERVING THE EQUIPMENT COVERED BY THIS APPLICATION, THE APPLICANT SHALL DEFINE THE EMISSIONS FROM SUCH OTHER EQUIPMENT AND ATTACH SUCH INFORMATION TO THIS APPLICATION AS EXHIBIT G.

TOTAL NUMBER OF PAGES IN EXHIBIT G: _____

EXHIBIT F

A) Discontinued operation of this equipment would expose employees to solvent vapors until the oven itself was depleted of vaporized solvent from the coating curing process. Once this had dissipated, there would be no further severe damage to equipment, tendency to cause injury or prevent essential services to the public from being provided.

B) It is anticipated that the maximum period of time the equipment would operate during malfunction or breakdown would be several days. From experience at other operations with this type of equipment, malfunctions/breakdowns are commonly corrected within a few hours. In the event the breakdown was related to a part not immediately available, it would be expected that the part could be obtained within several days and then installed.

EXHIBIT F (Cont'd.)

C) The lockout system will prevent operation of any emission sources unless the incinerator is in the breakdown mode. A preventative maintenance program will provide the necessary lubrication on a regular basis. During the annual shutdown period, the incinerator will be inspected for any refractory replacement that may be necessary, the heat exchanger examined for any corrosion and blower and burner system inspected for any electrical repairs. The facility will maintain essential repair parts on-site to minimize any downtime. The facility has a maintenance staff on-site that can handle most repair work.

D) Due to the nature of the facility, operation of the different production lines are relatively independent. This will allow for limiting the operation to only required lines of production until the breakdown is corrected. Efforts would be made to minimize the use of the internal spray machines that would utilize the highest VOC materials.

EXHIBIT F (Cont'd.)

E) The emission sources that would operate during malfunction/breakdown could include a variety of line combinations. On the flow diagram and the worse case scenario, lines 1S, 2S, Hinterkopt 7S, 8S, 9S, 2A, 3A, 4A, 5A, 6A, 7A and 8A would operate.

F) Each emission source separately may not exceed the standards depending upon the actual material being run. Likewise, some of the emissions may not be continuous due to production line problems, material changeovers and regular shutdown periods. The analysis of exhaust gas shown on APC-204, page 6, is the worse case where all emission sources are operable with the highest VOC materials.

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*DATA AND INFORMATION AIR POLLUTION CONTROL EQUIPMENT	

*THIS INFORMATION FORM IS FOR AN INDIVIDUAL UNIT OF AIR POLLUTION CONTROL EQUIPMENT OR AN AIR POLLUTION CONTROL SYSTEM.

1. NAME OF OWNER: CLARCOR, Inc.	2. NAME OF CORPORATE DIVISION OR PLANT (IF DIFFERENT FROM OWNER): J. L. Clark - Atlas Tube Division
3. STREET ADDRESS OF CONTROL EQUIPMENT: 2300 Wisconsin Avenue	4. CITY OF CONTROL EQUIPMENT: Downers Grove
5. NAME OF CONTROL EQUIPMENT OR CONTROL SYSTEM: Smith Environmental Model 10080	

INSTRUCTIONS

1. COMPLETE THE ABOVE IDENTIFICATION.
2. COMPLETE THE APPROPRIATE SECTION FOR THE UNIT OF CONTROL EQUIPMENT, OR THE APPROPRIATE SECTIONS FOR THE CONTROL SYSTEM. BE CERTAIN THAT THE ARRANGEMENT OF VARIOUS UNITS IN A CONTROL SYSTEM IS MADE CLEAR IN THE PROCESS FLOW DIAGRAM.
3. COMPLETE PAGE 6 OF THIS FORM, EMISSION INFORMATION AND EXHAUST POINT INFORMATION.
4. EFFICIENCY VALUES SHOULD BE SUPPORTED WITH A DETAILED EXPLANATION OF THE METHOD OF CALCULATION, THE MANNER OF ESTIMATION, OR THE SOURCE OF INFORMATION. REFERENCE TO THIS FORM ANY RELEVANT INFORMATION OR EXPLANATION INCLUDED IN THIS PERMIT APPLICATION.
5. EFFICIENCY VALUES AND CERTAIN OTHER ITEMS OF INFORMATION ARE TO BE GIVEN FOR AVERAGE AND MAXIMUM OPERATION OF THE SOURCE EQUIPMENT. FOR EXAMPLE, "MAXIMUM EFFICIENCY" IS THE EFFICIENCY OF THE CONTROL EQUIPMENT WHEN THE SOURCE IS AT MAXIMUM OPERATION, AND "AVERAGE FLOW RATE" IS THE FLOW RATE INTO THE CONTROL EQUIPMENT WHEN THE SOURCE IS AT AVERAGE OPERATION.
6. FOR GENERAL INFORMATION REFER TO "GENERAL INSTRUCTIONS FOR PERMIT APPLICATIONS", APC-201.

DEFINITIONS

AVERAGE - THE VALUE THAT SUMMARIZES OR REPRESENTS THE GENERAL CONDITION OF THE EMISSION SOURCE OR THE GENERAL STATE OF PRODUCTION OF THE EMISSION SOURCE. SPECIFICALLY:
AVERAGE OPERATION - OPERATION TYPICAL OF THE PRECEDING TWELVE MONTH PERIOD, AS REPRESENTED BY AVERAGE OPERATING TIME AND AVERAGE RATES.

MAXIMUM - THE GREATEST VALUE ATTAINABLE OR ATTAINED FROM THE EMISSION SOURCE, OR THE PERIOD OF GREATEST OR UTMOST PRODUCTION OF THE EMISSION SOURCE. SPECIFICALLY:
MAXIMUM OPERATION - THE GREATEST EXPECTED OPERATION, AS REPRESENTED BY MAXIMUM OPERATING TIME AND MAXIMUM RATES.

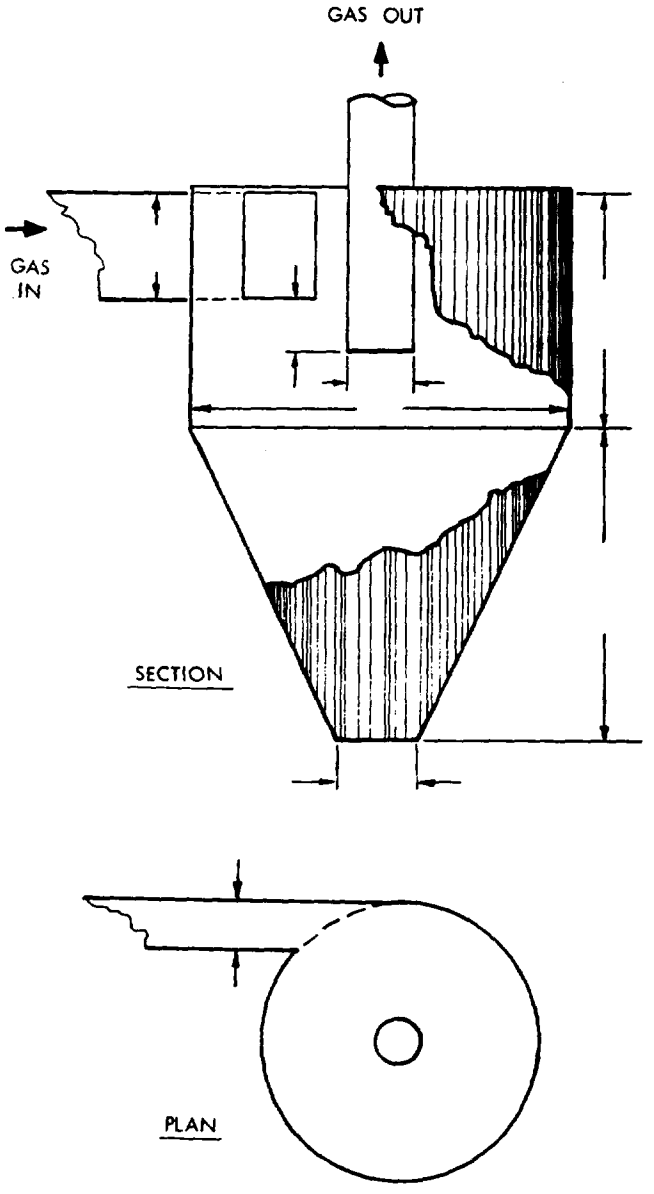
ADSORPTION UNIT	
1. FLOW DIAGRAM DESIGNATION(S) OF ADSORPTION UNIT:	
2. MANUFACTURER:	3. MODEL NAME AND NUMBER:
4. ADSORBENT: ☐ ACTIVATED CHARCOAL: TYPE _____ ☐ OTHER: SPECIFY _____	
5. ADSORBATE(S):	
6. NUMBER OF BEDS PER UNIT:	7. WEIGHT OF ADSORBENT PER BED: LB
8. DIMENSIONS OF BED: THICKNESS _____ IN, SURFACE AREA _____ SQUARE IN	
9. INLET GAS TEMPERATURE: °F	10. PRESSURE DROP ACROSS UNIT: INCH H_2O GAUGE
11. TYPE OF REGENERATION: ☐ REPLACEMENT ☐ STEAM ☐ OTHER: SPECIFY _____	
12. METHOD OF REGENERATION: ☐ ALTERNATE USE OF _____ ENTIRE UNITS ☐ ALTERNATE USE OF _____ BEDS IN A SINGLE UNIT ☐ SOURCE SHUT DOWN ☐ OTHER: DESCRIBE	
AVERAGE OPERATION OF SOURCE	MAXIMUM OPERATION OF SOURCE
13. TIME ON LINE BEFORE REGENERATION: MIN/BED	15. TIME ON LINE BEFORE REGENERATION: MIN/BED
14. EFFICIENCY OF ADSORBER (SEE INSTRUCTION 4): %	16. EFFICIENCY OF ADSORBER (SEE INSTRUCTION 4): %

AFTERBURNER	
1. FLOW DIAGRAM DESIGNATION(S) OF AFTERBURNER: "TO"	
2. MANUFACTURER: Smith Environmental	3. MODEL NAME AND NUMBER: Model 10080
4. COMBUSTION CHAMBER DIMENSIONS: LENGTH 130 IN, CROSS-SECTIONAL AREA 3800 SQUARE IN.	
5. INLET GAS TEMPERATURE: 250 °F	7. FUEL: ☒ GAS ☐ OIL: SULFUR _____ WT%
6. OPERATING TEMPERATURE OF COMBUSTION CHAMBER: 1400 °F	8. BURNERS PER AFTERBURNER: 1 @ 800,000 BTU/HR EACH
9. CATALYST USED: ☒ NO ☐ YES: DESCRIBE CATALYST _____	
10. HEAT EXCHANGER USED: ☐ NO ☒ YES: DESCRIBE HEAT EXCHANGER See Page 21	
AVERAGE OPERATION OF SOURCE	MAXIMUM OPERATION OF SOURCE
11. GAS FLOW RATE: 7920 SCFM	13. GAS FLOW RATE: 8915 SCFM
12. EFFICIENCY OF AFTERBURNER (SEE INSTRUCTION 4): 95 %	14. EFFICIENCY OF AFTERBURNER (SEE INSTRUCTION 4): 95 %

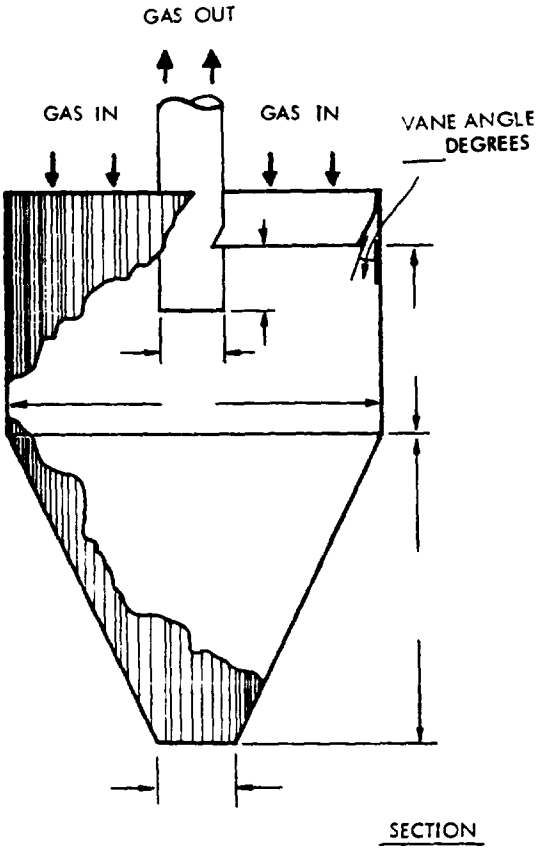
CYCLONE	
1. FLOW DIAGRAM DESIGNATION(S) OF CYCLONE:	
2. MANUFACTURER:	3. MODEL:
4. TYPE OF CYCLONE: ☐ SIMPLE ☐ MULTIPLE	5. NUMBER OF CYCLONES IN EACH MULTIPLE CYCLONE:

6. DIMENSION THE APPROPRIATE SKETCH (IN INCHES) OR PROVIDE A DRAWING WITH EQUIVALENT INFORMATION:

TANGENTIAL INLET CYCLONE



AXIAL INLET CYCLONE
(INDIVIDUAL CYCLONE OF MULTIPLE CYCLONE)



NOT TO SCALE

AVERAGE OPERATION OF SOURCE	MAXIMUM OPERATION OF SOURCE
7. GAS FLOW RATE: SCFM	9. GAS FLOW RATE: SCFM
8. EFFICIENCY OF CYCLONE (SEE INSTRUCTION 4): %	10. EFFICIENCY OF CYCLONE (SEE INSTRUCTION 4): %

CONDENSER

1. FLOW DIAGRAM DESIGNATION(S) OF CONDENSER:

2. MANUFACTURER:

3. MODEL NAME AND NUMBER:

4. HEAT EXCHANGE AREA: FT^2

AVERAGE OPERATION OF SOURCE	MAXIMUM OPERATION OF SOURCE
5. COOLANT FLOW RATE PER CONDENSER: WATER _____ GPM AIR _____ SCFM OTHER: TYPE _____, FLOW RATE _____	10. COOLANT FLOW RATE PER CONDENSER: WATER _____ GPM AIR _____ SCFM OTHER: TYPE _____, FLOW RATE _____
6. GAS FLOW RATE: SCFM	11. GAS FLOW RATE: SCFM
7. COOLANT TEMPERATURE: INLET ____ °F OUTLET ____ °F 8. GAS TEMPERATURE: INLET ____ °F OUTLET ____ °F	12. COOLANT TEMPERATURE: INLET ____ °F OUTLET ____ °F 13. GAS TEMPERATURE: INLET ____ °F OUTLET ____ °F
9. EFFICIENCY OF CONDENSER (SEE INSTRUCTION 4): %	14. EFFICIENCY OF CONDENSER (SEE INSTRUCTION 4): %

*ELECTRICAL PRECIPITATOR

1. FLOW DIAGRAM DESIGNATION OF ELECTRICAL PRECIPITATOR:

2. MANUFACTURER:

3. MODEL NAME AND NUMBER:

4. COLLECTING ELECTRODE AREA PER CONTROL DEVICE: FT^2

AVERAGE OPERATION OF SOURCE	MAXIMUM OPERATION OF SOURCE
5. GAS FLOW RATE: SCFM	7. GAS FLOW RATE: SCFM
6. EFFICIENCY OF ELECTRICAL PRECIPITATOR (SEE INSTRUCTION 4): %	8. EFFICIENCY OF ELECTRICAL PRECIPITATOR (SEE INSTRUCTION 4): %

SUBMIT THE MANUFACTURER'S SPECIFICATIONS FOR THE ELECTRICAL PRECIPITATOR. REFERENCE THE INFORMATION TO THIS FORM.

*ELECTRICAL PRECIPITATORS VARY GREATLY IN THEIR DESIGN AND IN THEIR COMPLEXITY. THE ITEMS IN THIS SECTION PROVIDE A MINIMUM AMOUNT OF INFORMATION. THE APPLICANT MUST, HOWEVER, SUBMIT WITH THIS APPLICATION THE MANUFACTURER'S SPECIFICATIONS, INCLUDING ANY DRAWINGS, TECHNICAL DOCUMENTS, ETC. IF THE INFORMATION PROVIDED BY THE MANUFACTURER'S SPECIFICATIONS IS INSUFFICIENT FOR FULL AND ACCURATE ANALYSIS, THE AGENCY WILL REQUEST SPECIFIC ADDITIONAL INFORMATION.

FILTER UNIT

1. FLOW DIAGRAM DESIGNATION(S) OF FILTER UNIT:

2. MANUFACTURER:

3. MODEL NAME AND NUMBER:

4. FILTERING MATERIAL:

5. FILTERING AREA:

6. CLEANING METHOD:
☐ SHAKER ☐ REVERSE AIR ☐ PULSE AIR ☐ PULSE JET ☐ OTHER: SPECIFY _____

7. GAS COOLING METHOD: ☐ DUCTWORK: LENGTH _____ FT., DIAM _____ IN.
☐ BLEED-IN AIR ☐ WATER SPRAY ☐ OTHER: SPECIFY

AVERAGE OPERATION OF SOURCE	MAXIMUM OPERATION OF SOURCE
8. GAS FLOW RATE (FROM SOURCE): SCFM	12. GAS FLOW RATE (FROM SOURCE): SCFM
9. GAS COOLING FLOW RATE: BLEED-IN AIR _____ SCFM, WATER SPRAY _____ GPM	13. GAS COOLING FLOW RATE: BLEED-IN AIR _____ SCFM, WATER SPRAY _____ GPM
10. INLET GAS CONDITION: TEMPERATURE _____ °F DEWPOINT _____ °F	14. INLET GAS CONDITION: TEMPERATURE _____ °F DEWPOINT _____ °F
11. EFFICIENCY OF FILTER UNIT (SEE INSTRUCTION 4): %	15. EFFICIENCY OF FILTER UNIT (SEE INSTRUCTION 4): %

SCRUBBER

1. FLOW DIAGRAM DESIGNATION(S) OF SCRUBBER:

2. MANUFACTURER:

3. MODEL NAME AND NUMBER:

4. TYPE OF SCRUBBER:

☐ HIGH ENERGY: GAS STREAM PRESSURE DROP _____ INCH H_2O

☐ PACKED: PACKING TYPE _____, PACKING SIZE _____, PACKED HEIGHT _____ IN.

☐ SPRAY: NUMBER OF NOZZLES _____, NOZZLE PRESSURE _____ PSIG

☐ OTHER: SPECIFY _____ ATTACH DESCRIPTION AND SKETCH WITH DIMENSIONS

5. TYPE OF FLOW:

☐ COCURRENT ☐ COUNTERCURRENT ☐ CROSSFLOW

6. SCRUBBER GEOMETRY:

LENGTH IN DIRECTION OF GAS FLOW _____ IN., CROSS-SECTIONAL AREA _____ SQUARE IN.

7. CHEMICAL COMPOSITION OF SCRUBBANT:

AVERAGE OPERATION OF SOURCE	MAXIMUM OPERATION OF SOURCE
8. SCRUBBANT FLOW RATE: GPM	12. SCRUBBANT FLOW RATE: GPM
9. GAS FLOW RATE: SCFM	13. GAS FLOW RATE: SCFM
10. INLET GAS TEMPERATURE: °F	14. INLET GAS TEMPERATURE: °F
11. EFFICIENCY OF SCRUBBER (SEE INSTRUCTION 4): _____ % PARTICULATE _____ % GASEOUS	15. EFFICIENCY OF SCRUBBER (SEE INSTRUCTION 4): _____ % PARTICULATE _____ % GASEOUS

OTHER TYPE OF CONTROL EQUIPMENT

1. FLOW DIAGRAM DESIGNATION(S) OF "OTHER TYPE" OF CONTROL EQUIPMENT:

2. GENERIC NAME OF "OTHER" EQUIPMENT:

3. MANUFACTURER:

4. MODEL NAME AND NUMBER:

5. DESCRIPTION AND SKETCH, WITH DIMENSIONS AND FLOW RATES, OF "OTHER" EQUIPMENT:

AVERAGE OPERATION OF SOURCE	MAXIMUM OPERATION OF SOURCE
6. FLOW RATES: _____ GPM _____ SCFM	8. FLOW RATES: _____ GPM _____ SCFM
7. EFFICIENCY OF "OTHER" EQUIPMENT (SEE INSTRUCTION 4): %	9. EFFICIENCY OF "OTHER" EQUIPMENT (SEE INSTRUCTION 4): %

EMISSION INFORMATION

1. NUMBER OF IDENTICAL CONTROL UNITS OR CONTROL SYSTEMS (DESCRIBE AS REQUIRED):

AVERAGE OPERATION OF SOURCE

CONTAMINANT	CONCENTRATION OR EMISSION RATE PER IDENTICAL CONTROL UNIT OR CONTROL SYSTEM		METHOD USED TO DETERMINE CONCENTRATION OR EMISSION RATE
PARTICULATE MATTER	2a. GR/SCF	b. LB/HR	c.
CARBON MONOXIDE	3a. PPM (VOL)	b. LB/HR	c.
NITROGEN OXIDES	4a. PPM (VOL)	b. LB/HR	c.
ORGANIC MATERIAL	5a. PPM (VOL)	b. 37.4 LB/HR	c. Mass Balance Equation
SULFUR DIOXIDE	6a. PPM (VOL)	b. LB/HR	c.
OTHER (SPECIFY)	7a. PPM (VOL)	b. LB/HR	c.

MAXIMUM OPERATION OF SOURCE

CONTAMINANT	CONCENTRATION OR EMISSION RATE PER IDENTICAL CONTROL UNIT OR CONTROL SYSTEM		METHOD USED TO DETERMINE CONCENTRATION OR EMISSION RATE
PARTICULATE MATTER	8a. GR/SCF	b. LB/HR	c.
CARBON MONOXIDE	9a. PPM (VOL)	b. LB/HR	c.
NITROGEN OXIDES	10a. PPM (VOL)	b. LB/HR	c.
ORGANIC MATERIAL	11a. PPM (VOL)	b. 52.5 LB/HR	c. Mass Balance Equation
SULFUR DIOXIDE	12a. PPM (VOL)	b. LB/HR	c.
OTHER (SPECIFY)	13a. PPM (VOL)	b. LB/HR	c.

**"OTHER" CONTAMINANT SHOULD BE USED FOR AN AIR CONTAMINANT NOT SPECIFICALLY NAMED ABOVE. POSSIBLE OTHER CONTAMINANTS ARE ASBESTOS, BERYLLIUM, MERCURY, VINYL CHLORIDE, LEAD, ETC.

EXHAUST POINT INFORMATION

1. FLOW DIAGRAM DESIGNATION(S) OF EXHAUST POINT: "DD"

2. DESCRIPTION OF EXHAUST POINT (LOCATION IN RELATION TO BUILDINGS, DIRECTION, HOODING, ETC.):
14' from north side of building (see Plot Plan)

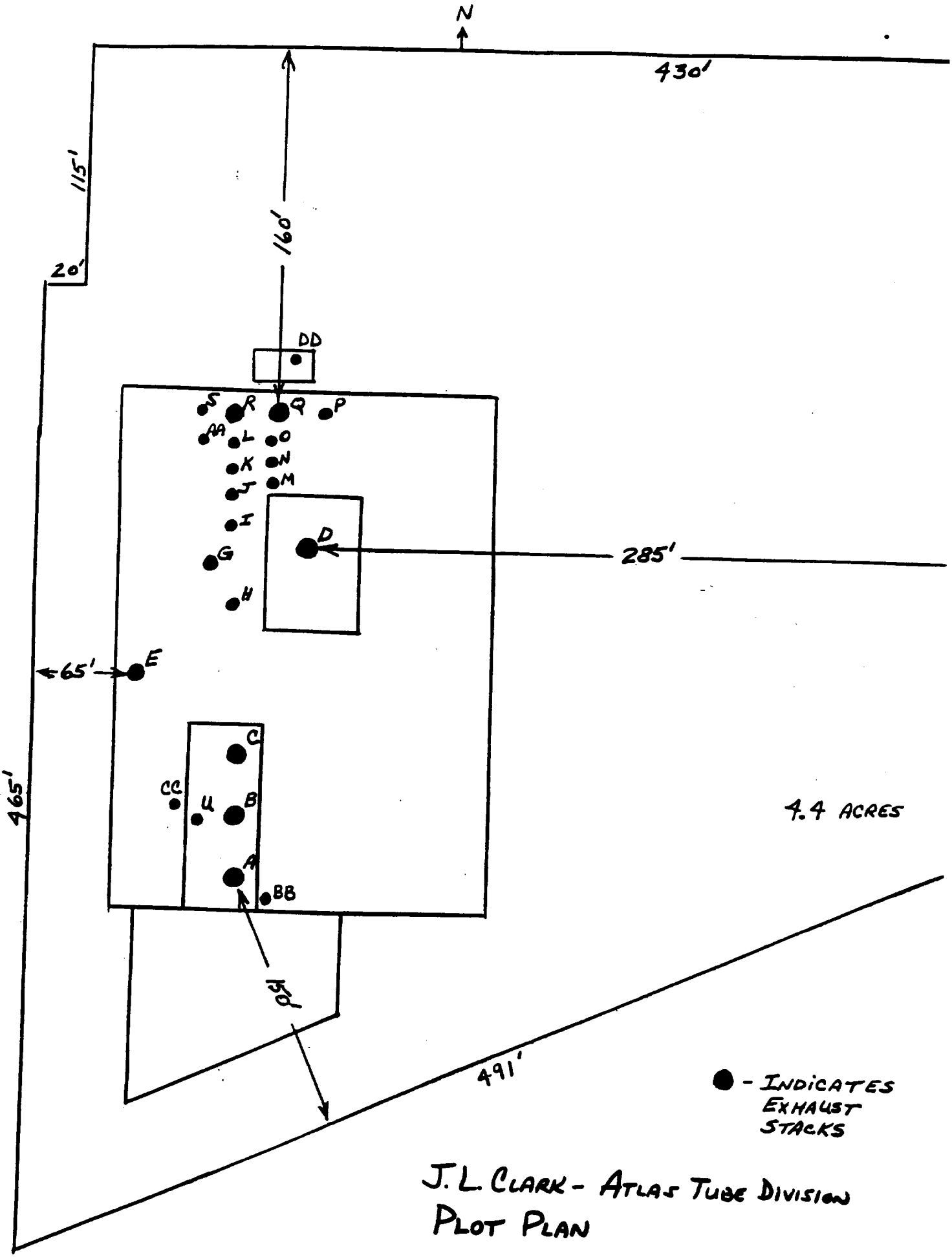
3. EXIT HEIGHT ABOVE GRADE: 24'

4. EXIT DIAMETER: 31"

5. GREASTEST HEIGHT OF NEARBY BUILDINGS: 20 FT

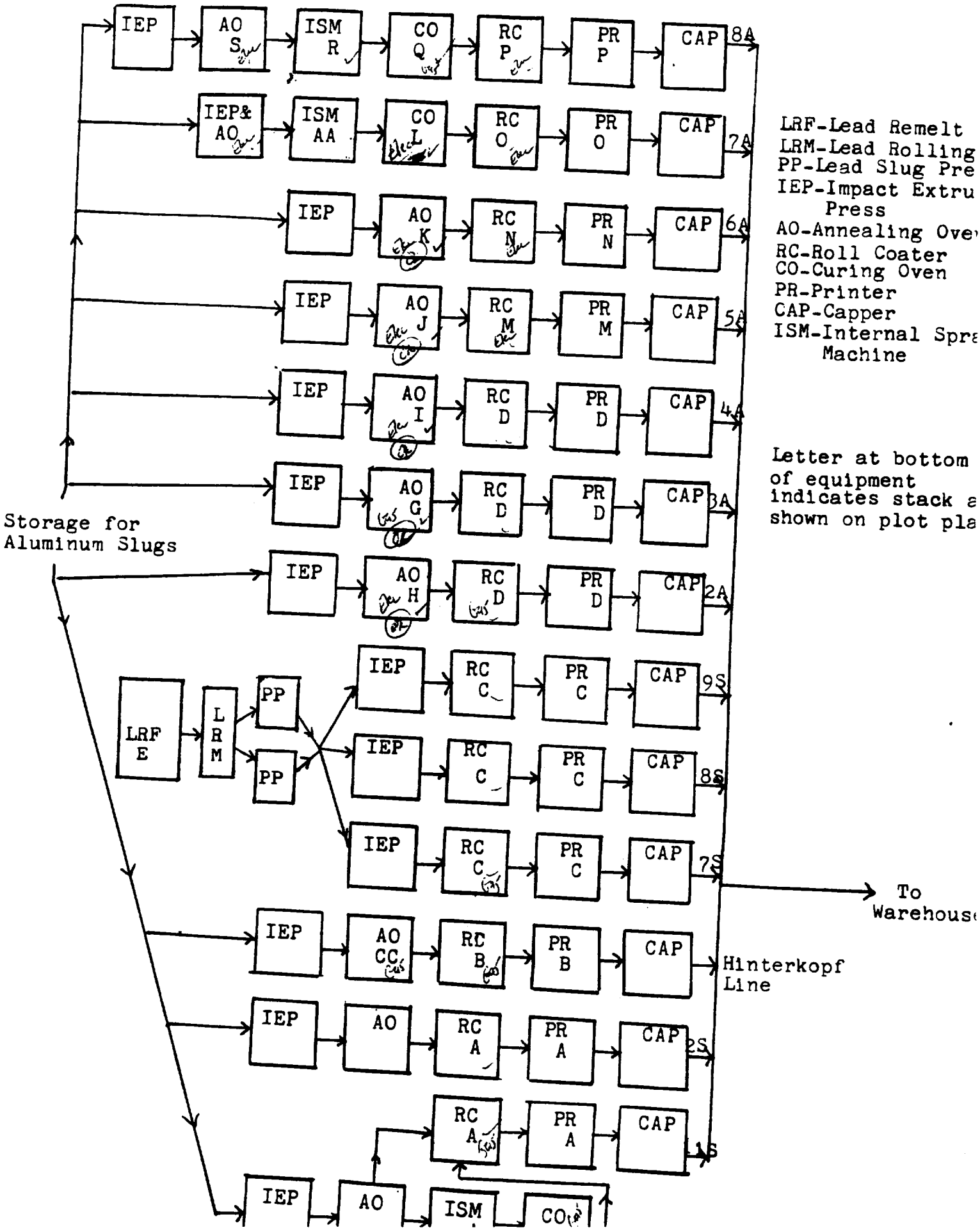
6. EXIT DISTANCE FROM NEAREST PLANT BOUNDARY: 144 FT

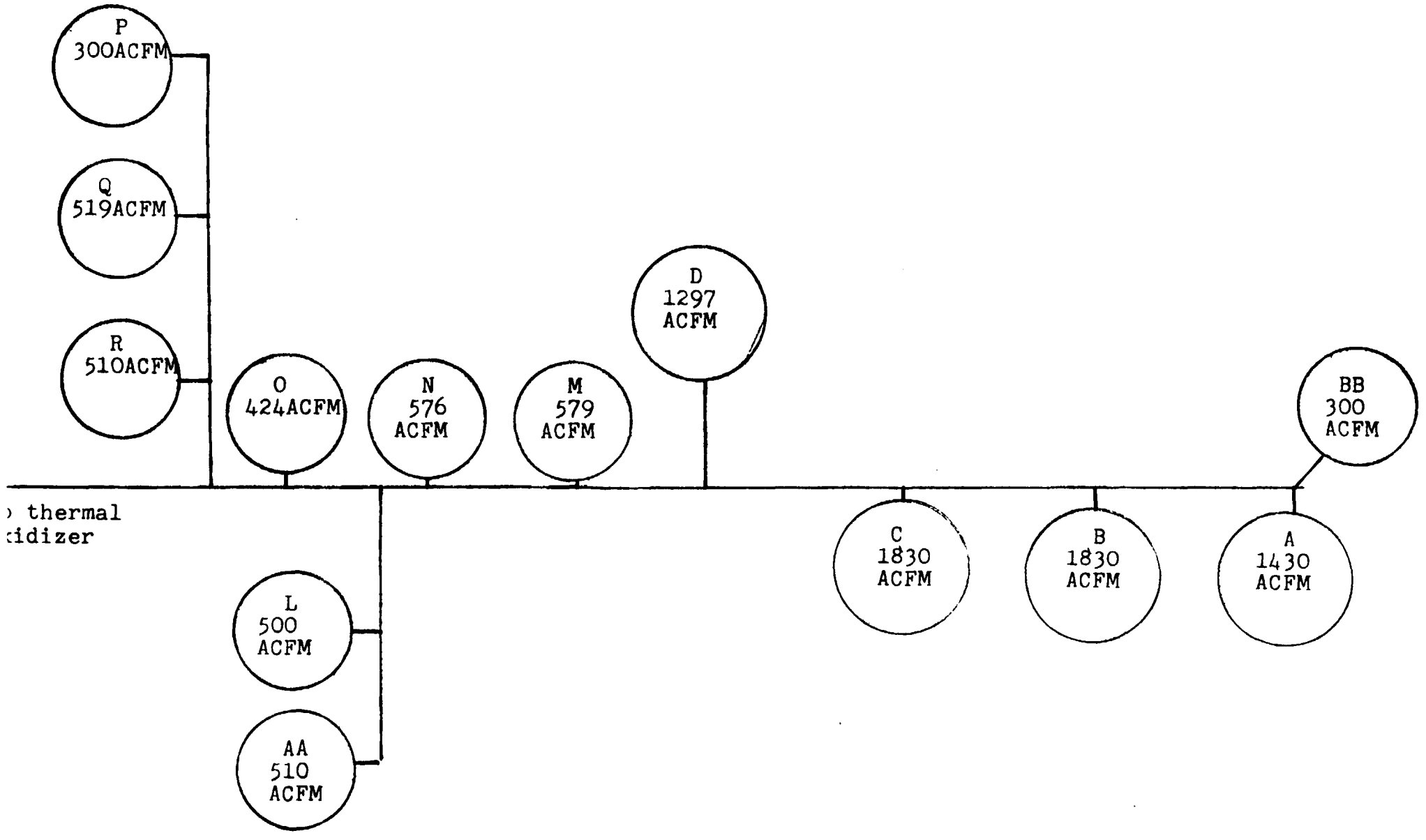
AVERAGE OPERATION OF SOURCE	MAXIMUM OPERATION OF SOURCE
7. EXIT GAS TEMPERATURE: 460 °F	9. EXIT GAS TEMPERATURE: 484 °F
8. GAS FLOW RATE THROUGH EACH EXIT: 4090 ACFM	10. GAS FLOW RATE THROUGH EACH EXIT: 5614 ACFM



J. L. CLARK - ATLAS TUBE DIVISION
PLOT PLAN

J. L. CLARK - ATLAS TUBE DIVISION
FLOW DIAGRAM





J. L. CLARK - ATLAS TUBE DIVISION
AIR FLOW DIAGRAM

Each exhaust will have a spring loaded damper that will be normally open to atmosphere. When the oxidizer is started, each line will go to purge gas from the oven start up and

CERTIFIED RESOLUTION

I, M. C. Arne, do hereby certify that I am the duly elected, qualified and acting Secretary of CLARCOR Inc., a Corporation duly organized and existing under the laws of the State of Delaware and that the following is a true, correct and complete copy of a resolution duly adopted by the Board of Directors of CLARCOR Inc. (J. L. Clark Manufacturing Co.) on November 28, 1978, at a special meeting of the Board, and that said resolution remains in force and effect at the date hereof, not having been altered, amended, or repealed in any respect whatsoever:

> "WHEREAS, The State of Illinois Environmental Protection Agency requires that a corporation applying for a permit to install pollution control equipment file with them a certified copy of a resolution of its Board of Directors authorizing individuals to execute operating permit applications and to cause or allow the construction, modification and operation of the equipment covered by the permit.
>
> BE IT HEREBY RESOLVED, That the President or a Vice President of J. L. Clark Manufacturing Co. be authorized to sign such permits and to cause or allow the construction, modification and operation of the equipment covered by such permits, and
>
> BE IT FURTHER RESOLVED, That the Secretary be instructed to file a certified copy of this resolution with the proper authorities."

IN WITNESS WHEREOF, I have hereunto set my hand and the seal of CLARCOR Inc. this 18th day of March, 1988.

M. C. Arne

Secretary
CLARCOR Inc.

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62706

COMPLIANCE PROGRAM AND
PROJECT COMPLETION SCHEDULE

NAME OF EQUIPMENT TO BE CONSTRUCTED OR MODIFIED: Smith Environmental Thermal Oxidizer (A)

FOR AGENCY USE ONLY

I. D. NO. _____

PERMIT NO. _____

DATE _____

1a. NAME OF OWNER: CLARCOR, Inc.	2a. NAME OF OPERATOR: J. L. Clark
1b. STREET ADDRESS OF OWNER: 2323 Sixth Steeet	2b. STREET ADDRESS OF OPERATOR: 2300 Sixth Street
1c. CITY OF OWNER: Rockford	2c. CITY OF OPERATOR: Rockford
1d. STATE OF OWNER: IL. / 1e. ZIP CODE: 61104	2d. STATE OF OPERATOR: IL / 2e. ZIP CODE: 61104

3a. NAME OF CORPORATE DIVISION OR PLANT: Atlas Tube Division		3b. STREET ADDRESS OF EMISSION SOURCE: 2300 Wisconsin Avenue		
3c. CITY OF EMISSION SOURCE: Downers Grove	3d. LOCATED WITHIN CITY LIMITS ☒ YES ☐ NO	3e. TOWNSHIP: Lisle	3f. COUNTY: DuPage	3g. ZIP CODE: 60515

4. ALL CORRESPONDENCE TO: (NAME OF INDIVIDUAL) James K. Klotz	5. TELEPHONE NUMBER FOR AGENCY TO CALL: 815/962-8861
6. ADDRESS FOR CORRESPONDENCE: ☐ OWNER ☒ OPERATOR ☐ EMISSION SOURCE	

THE UNDERSIGNED HEREBY CERTIFIES THAT THE STATEMENTS CONTAINED HEREIN ARE CORRECT AND CURRENT. BY AFFIXING MY SIGNATURE HERETO I FURTHER CERTIFY THAT I AM AUTHORIZED TO EXECUTE THIS DOCUMENT.

AUTHORIZED SIGNATURE(S): (B)

7. BY Richard W. Malmgren (SIGNATURE) 4/19/88 (DATE)
Richard W. Malmgren (TYPED OR PRINTED NAME OF SIGNER)
Executive Vice President (TITLE OF SIGNER)

BY Ronald A. Moreau (SIGNATURE) 4.19.88 (DATE)
Ronald A. Moreau (TYPED OR PRINTED NAME OF SIGNER)
Vice President - Manufacturing (TITLE OF SIGNER)

(A) THIS FORM IS TO PROVIDE THE AGENCY WITH GENERAL INFORMATION ABOUT THE COMPLIANCE PROGRAM. CLEARLY IDENTIFY THE GENERIC NAME OF ANY EQUIPMENT TO BE CONSTRUCTED OR MODIFIED PURSUANT TO THIS PLAN.

(B) THIS MUST BE SIGNED IN ACCORDANCE WITH PCB REGS., CHAPTER 2, PART 1, RULE 104(c)(2). IF THE PERSON SIGNING THE COMPLIANCE PROGRAM AND PROJECT COMPLETION SCHEDULE IS AUTHORIZED TO DO SO BY A RESOLUTION OF THE BOARD OF DIRECTORS, SUCH AUTHORIZATION WILL USUALLY COMPLY WITH THE BEFORE-MENTIONED RULE.

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62706

This Agency is authorized to require this information un Illinois Revised Statutes, 1979, Chapter III 1/2, Section 1(Disclosure of this information is required under that Sec Failure to do so may prevent this form from being proce and could result in your application being denied. This f has been approved by the Forms Management Center.

APPLICATION FOR A PERMIT (A)

☒ CONSTRUCT ☒ OPERATE

NAME OF EQUIPMENT TO BE CONSTRUCTED OR OPERATED: Hinterkopf Aluminum Tube Line (B)

FOR AGENCY USE ONLY

I. D. NO. _____

PERMIT NO. _____

DATE _____

1a. NAME OF OWNER: CLARCOR, Inc.		2a. NAME OF OPERATOR: J. L. Clark	
1b. STREET ADDRESS OF OWNER: 2323 Sixth Street		2b. STREET ADDRESS OF OPERATOR: 2300 Sixth Street	
1c. CITY OF OWNER: Rockford		2c. CITY OF OPERATOR: Rockford	
1d. STATE OF OWNER: IL	1e. ZIP CODE: 61104	2d. STATE OF OPERATOR: IL	2e. ZIP CODE: 61104

3a. NAME OF CORPORATE DIVISION OR PLANT: Atlas Tube Division		3b. STREET ADDRESS OF EMISSION SOURCE: 2300 Wisconsin Avenue		
3c. CITY OF EMISSION SOURCE: Downers Grove	3d. LOCATED WITHIN CITY LIMITS: ☒ YES ☐ NO	3e. TOWNSHIP: Lisle	3f. COUNTY: DuPage	3g. ZIP CODE: 60515

4. ALL CORRESPONDENCE TO: (TITLE AND/OR NAME OF INDIVIDUAL) James K. Klotz/Chief Chemist	5. TELEPHONE NUMBER FOR AGENCY TO CALL: 815/962-8861
6. ADDRESS FOR CORRESPONDENCE: (CHECK ONLY ONE) ☐ OWNER: ☒ OPERATOR ☐ EMISSION SOURCE	7. YOUR DESIGNATION FOR THIS APPLICATION: (C) 3500

8. THE UNDERSIGNED HEREBY MAKES APPLICATION FOR A PERMIT AND CERTIFIES THAT THE STATEMENTS CONTAINED HEREIN ARE TRUE AND CORRECT, AND FURTHER CERTIFIES THAT ALL PREVIOUSLY SUBMITTED INFORMATION REFERENCED IN THIS APPLICATION REMAINS TRUE, CORRECT AND CURRENT. BY AFFIXING HIS SIGNATURE HERETO HE FURTHER CERTIFIES THAT HE IS AUTHORIZED TO EXECUTE THIS APPLICATION.

AUTHORIZED SIGNATURE(S): (D)

BY [signature] 4/19/88	BY [signature] 4/19/88
SIGNATURE / DATE	SIGNATURE / DATE
Richard W. Malmgren	Ronald A. Moreau
TYPED OR PRINTED NAME OF SIGNER	TYPED OR PRINTED NAME OF SIGNER
Executive Vice President	Vice President - Manufacturing
TITLE OF SIGNER	TITLE OF SIGNER

(A) THIS FORM IS TO PROVIDE THE AGENCY WITH GENERAL INFORMATION ABOUT THE EQUIPMENT TO BE CONSTRUCTED OR OPERATED. THIS FORM MAY ONLY BE USED TO REQUEST ONE TYPE OF PERMIT - CONSTRUCTION OR OPERATION - AND NOT BOTH.

(B) ENTER THE GENERIC NAME OF THE EQUIPMENT TO BE CONSTRUCTED OR OPERATED. THIS NAME WILL APPEAR ON THE PERMIT WHICH MAY BE ISSUED PURSUANT TO THIS APPLICATION. THIS FORM MUST BE ACCOMPANIED BY OTHER APPLICABLE FORMS AND INFORMATION.

(C) PROVIDE A DESIGNATION IN ITEM 7 ABOVE WHICH YOU WOULD LIKE THE AGENCY TO USE FOR IDENTIFICATION OF YOUR EQUIPMENT. YOUR DESIGNATION WILL BE REFERENCED IN CORRESPONDENCE FROM THIS AGENCY RELATIVE TO THIS APPLICATION. YOUR DESIGNATION MUST NOT EXCEED TEN (10) CHARACTERS.

(D) THIS APPLICATION MUST BE SIGNED IN ACCORDANCE WITH PCB REGS., CHAPTER 2, PART 1, RULE 103(a)(4) OR 103(b)(5) WHICH STATES: "ALL APPLICATIONS AND SUPPLEMENTS THERETO SHALL BE SIGNED BY THE OWNER AND OPERATOR OF THE EMISSION SOURCE OR AIR POLLUTION CONTROL EQUIPMENT, OR THEIR AUTHORIZED AGENT, AND SHALL BE ACCOMPANIED BY EVIDENCE OF AUTHORITY TO SIGN THE APPLICATION."

IF THE OWNER OR OPERATOR IS A CORPORATION, SUCH CORPORATION MUST HAVE ON FILE WITH THE AGENCY A CERTIFIED COPY OF A RESOLUTION OF THE CORPORATION'S BOARD OF DIRECTORS AUTHORIZING THE PERSONS SIGNING THIS APPLICATION TO CAUSE OR ALLOW THE CONSTRUCTION OR OPERATION OF THE EQUIPMENT TO BE COVERED BY THE PERMIT.

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EXHIBIT A

A) Curing oven for roll coater and printer for tube manufacturing line.

B) This oven exhaust was included in our Permit 73030535 which permitted emissions of under 25 tons per year in the absence of air pollution control equipment.

EXHIBIT B

A) Hinterkopf aluminum tube line includes an extrusion press, an annealing oven, a roll coater, a printer, a curing oven for the coater and printer and a capping operation.

B) This equipment replaces three (3) previously existing lead tube lines as shown in our original permit application 73030535. These were identified as lines 4S, 5S and 6S. This equipment is original equipment and does not utilize any of the previously existing equipment except for the curing oven.

C) Construction is currently in process and anticipated start-up date of the equipment is May 16, 1988.

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
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2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62706

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Illinois Revised Statutes, 1979, Chapter III 1/2, Section
Disclosure of this information is required under that Se
Failure to do so may prevent this form from being proc
and could result in your application being denied. This
has been approved by the Forms Management Center.

DATA AND INFORMATION INCORPORATION BY REFERENCE	FOR AGENCY USE ONLY

THIS FORM IS TO BE USED TO INCORPORATE OR TRANSFER INFORMATION FROM ONE PERMIT APPLICATION TO ANOTHER, INCLUDING THE TRANSFER OF INFORMATION FROM A CONSTRUCTION PERMIT APPLICATION INTO AN OPERATING PERMIT APPLICATION. THIS FORM SHOULD ACCOMPANY THE APPLICATION INTO WHICH INFORMATION IS TO BE TRANSFERRED.

1. NAME OF OWNER: CLARCOR		2. NAME OF CORPORATE DIV. OR PLANT (IF DIFFERENT FROM OWNER): J. L. Clark - Atlas Tube Division
3. STREET ADDRESS OF EMISSION SOURCE: 2300 Wisconsin Avenue	4. CITY OF EMISSION SOURCE: Downers Grove	5. IDENTIFICATION NUMBER: 043030AAR

6. APPLICATION NUMBER: 73030535

7. ☐ CONSTRUCTION ☒ OPERATION OF various emission sources

8. SHOULD ALL INFORMATION IN THIS APPLICATION BE INCORPORATED BY REFERENCE OR TRANSFERRED?
☐ YES ☒ NO
IF "NO", LIST ITEMS TO BE INCORPORATED:

9a. ITEM TO BE INCORPORATED:	b. PAGE:	c. FLOW DIAGRAM DESIGNATION (IF APPLICABLE):
Exhibit B	9 & 10	
Coater - Printer - Drying Oven	47-50	Source "B"
Exhibit M	51 & 52	Source "B"
Drawing Number II	8	Lead Tube Lines
Exhibit C	6	Plot Plan

10. DOES THE DATA & INFORMATION DESCRIBING THESE ITEMS REMAIN TRUE, CORRECT, CURRENT AND COMPLETE?
☒ YES ☐ NO
IF "NO", SUBMIT THE APPLICABLE FORMS AND CLEARLY STATE THE DATA AND INFORMATION WHICH IS NO LONGER TRUE, CORRECT, CURRENT AND COMPLETE.

11. APPLICATION NUMBER:

12. ☐ CONSTRUCTION ☐ OPERATION OF

13. SHOULD ALL INFORMATION IN THIS APPLICATION BE INCORPORATED BY REFERENCE OR TRANSFERRED?
☐ YES ☐ NO
IF "NO", LIST ITEMS TO BE INCORPORATED:

14a. ITEM TO BE INCORPORATED:	b. PAGE:	c. FLOW DIAGRAM DESIGNATION (IF APPLICABLE):

15. DOES THE DATA & INFORMATION DESCRIBING THESE ITEMS REMAIN TRUE, CORRECT, CURRENT AND COMPLETE?
☐ YES ☐ NO
IF "NO", SUBMIT THE APPLICABLE FORMS AND CLEARLY STATE THE DATA AND INFORMATION WHICH IS NO LONGER TRUE, CORRECT, CURRENT AND COMPLETE.

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62706

This Agency is authorized to require this information under Illinois Revised Statutes, 1979, Chapter 111 1/2, Section 1039. Disclosure of this information is required under that Section. Failure to do so may prevent this form from being processed and could result in your application being denied. This form has been approved by the Forms Management Center.

*DATA AND INFORMATION PROCESS EMISSION SOURCE	

*THIS INFORMATION FORM IS TO BE COMPLETED FOR AN EMISSION SOURCE OTHER THAN A FUEL COMBUSTION EMISSION SOURCE OR AN INCINERATOR. A FUEL COMBUSTION EMISSION SOURCE IS A FURNACE, BOILER, OR SIMILAR EQUIPMENT USED PRIMARILY FOR PRODUCING HEAT OR POWER BY INDIRECT HEAT TRANSFER. AN INCINERATOR IS AN APPARATUS IN WHICH REFUSE IS BURNED.

1. NAME OF PLANT OWNER: CLARCOR, Inc.	2. NAME OF CORPORATE DIVISION OR PLANT (IF DIFFERENT FROM OWNER): J. L. Clark-Atlas Tube Division
3. STREET ADDRESS OF EMISSION SOURCE: 2323 Wisconsin Avenue	4. CITY OF EMISSION SOURCE: Downers Grove

GENERAL INFORMATION

5. NAME OF PROCESS: Annealing of Aluminum Tubes	6. NAME OF EMISSION SOURCE EQUIPMENT: Annealing Oven	
7. EMISSION SOURCE EQUIPMENT MANUFACTURER: J. W. Payne, Ltd.	8. MODEL NUMBER:	9. SERIAL NUMBER:
10. FLOW DIAGRAM DESIGNATION(S) OF EMISSION SOURCE: Hinterkopf Line		
11. IDENTITY(S) OF ANY SIMILAR SOURCE(S) AT THE PLANT OR PREMISES NOT COVERED BY THE FORM (IF THE SOURCE IS COVERED BY ANOTHER APPLICATION, IDENTIFY THE APPLICATION): None		
12. AVERAGE OPERATING TIME OF EMISSION SOURCE: 16 HRS/DAY 5 DAYS/WK 50 WKS/YR	13. MAXIMUM OPERATING TIME OF EMISSION SOURCE: 24 HRS/DAY 5 DAYS/WK 50 WKS/YR	
14. PERCENT OF ANNUAL THROUGHPUT: DEC-FEB 25 % MAR-MAY 25 % JUN-AUG 25 % SEPT-NOV 25 %		

INSTRUCTIONS

1. COMPLETE THE ABOVE IDENTIFICATION AND GENERAL INFORMATION SECTION.
2. COMPLETE THE RAW MATERIAL, PRODUCT, WASTE MATERIAL, AND FUEL USAGE SECTIONS FOR THE PARTICULAR SOURCE EQUIPMENT. COMPOSITIONS OF MATERIALS MUST BE SUFFICIENTLY DETAILED TO ALLOW DETERMINATION OF THE NATURE AND QUANTITY OF POTENTIAL EMISSIONS. IN PARTICULAR, THE COMPOSITION OF PAINTS, INKS, ETC., AND ANY SOLVENTS MUST BE FULLY DETAILED.
3. EMISSION AND EXHAUST POINT INFORMATION MUST BE COMPLETED, UNLESS EMISSIONS ARE EXHAUSTED THROUGH AIR POLLUTION CONTROL EQUIPMENT.
4. OPERATING TIME AND CERTAIN OTHER ITEMS REQUIRE BOTH AVERAGE AND MAXIMUM VALUES.
5. FOR GENERAL INFORMATION REFER TO "GENERAL INSTRUCTIONS FOR PERMIT APPLICATIONS," APC-201.

DEFINITIONS

AVERAGE - THE VALUE THAT SUMMARIZES OR REPRESENTS THE GENERAL CONDITION OF THE EMISSION SOURCE, OR THE GENERAL STATE OF PRODUCTION OF THE EMISSION SOURCE. SPECIFICALLY:
- AVERAGE OPERATING TIME - ACTUAL TOTAL HOURS OF OPERATION FOR THE PRECEDING TWELVE MONTH PERIOD.
- AVERAGE RATE - ACTUAL TOTAL QUANTITY OF "MATERIAL" FOR THE PRECEDING TWELVE MONTH PERIOD, DIVIDED BY THE AVERAGE OPERATING TIME.
- AVERAGE OPERATION - OPERATION TYPICAL OF THE PRECEDING TWELVE MONTH PERIOD, AS REPRESENTED BY AVERAGE OPERATING TIME AND AVERAGE RATES.

MAXIMUM - THE GREATEST VALUE ATTAINABLE OR ATTAINED FROM THE EMISSION SOURCE, OR THE PERIOD OF GREATEST OR UTMOST PRODUCTION OF THE EMISSION SOURCE. SPECIFICALLY:
- MAXIMUM OPERATING TIME - GREATEST EXPECTED TOTAL HOURS OF OPERATIONS FOR ANY TWELVE MONTH PERIOD.
- MAXIMUM RATE - GREATEST QUANTITY OF "MATERIAL" EXPECTED PER ANY ONE HOUR OF OPERATION.
- MAXIMUM OPERATION - GREATEST EXPECTED OPERATION, AS REPRESENTED BY MAXIMUM OPERATING TIME AND MAXIMUM RATES.

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
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2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62706

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*DATA AND INFORMATION PROCESS EMISSION SOURCE	

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1. NAME OF PLANT OWNER: CLARCOR, Inc.	2. NAME OF CORPORATE DIVISION OR PLANT (IF DIFFERENT FROM OWNER): J. L. Clark-Atlas Tube Division
3. STREET ADDRESS OF EMISSION SOURCE: 2300 Wisconsin Avenue	4. CITY OF EMISSION SOURCE: Downers Grove

GENERAL INFORMATION

5. NAME OF PROCESS: Coating & Printing of Aluminum Tubes	6. NAME OF EMISSION SOURCE EQUIPMENT: Roll Coater & Printer	
7. EMISSION SOURCE EQUIPMENT MANUFACTURER: Hinterkopf	8. MODEL NUMBER:	9. SERIAL NUMBER:
10. FLOW DIAGRAM DESIGNATION(S) OF EMISSION SOURCE: Hinterkopf Line		
11. IDENTITY(S) OF ANY SIMILAR SOURCE(S) AT THE PLANT OR PREMISES NOT COVERED BY THE FORM (IF THE SOURCE IS COVERED BY ANOTHER APPLICATION, IDENTIFY THE APPLICATION): None		
12. AVERAGE OPERATING TIME OF EMISSION SOURCE: 16 HRS/DAY 5 DAYS/WK 50 WKS/YR	13. MAXIMUM OPERATING TIME OF EMISSION SOURCE: 24 HRS/DAY 5 DAYS/WK 50 WKS/YR	
14. PERCENT OF ANNUAL THROUGHPUT: DEC-FEB 25 % MAR-MAY 25 % JUN-AUG 25 % SEPT-NOV 25 %		

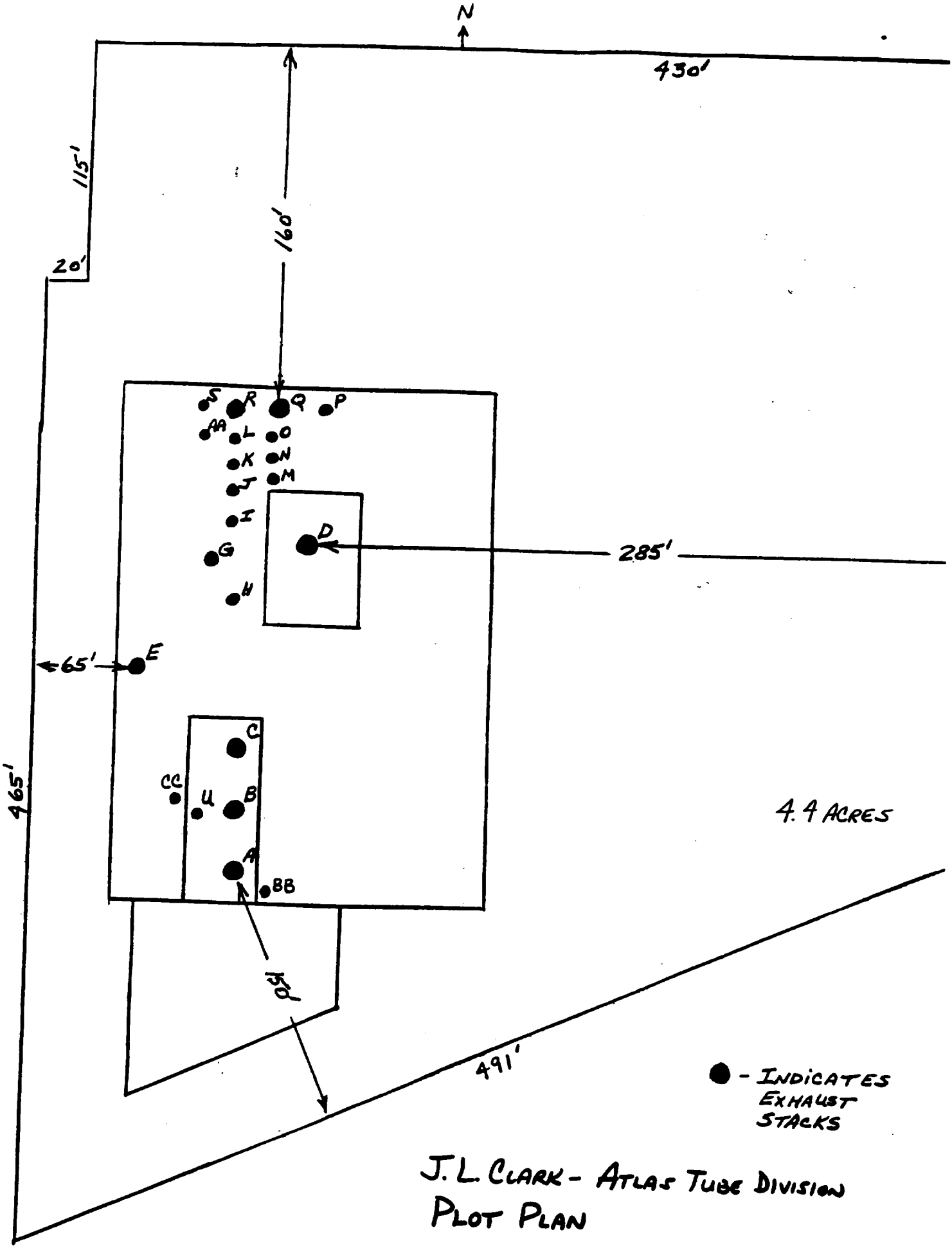
INSTRUCTIONS

1. COMPLETE THE ABOVE IDENTIFICATION AND GENERAL INFORMATION SECTION.
2. COMPLETE THE RAW MATERIAL, PRODUCT, WASTE MATERIAL, AND FUEL USAGE SECTIONS FOR THE PARTICULAR SOURCE EQUIPMENT. COMPOSITIONS OF MATERIALS MUST BE SUFFICIENTLY DETAILED TO ALLOW DETERMINATION OF THE NATURE AND QUANTITY OF POTENTIAL EMISSIONS. IN PARTICULAR, THE COMPOSITION OF PAINTS, INKS, ETC., AND ANY SOLVENTS MUST BE FULLY DETAILED.
3. EMISSION AND EXHAUST POINT INFORMATION MUST BE COMPLETED, UNLESS EMISSIONS ARE EXHAUSTED THROUGH AIR POLLUTION CONTROL EQUIPMENT.
4. OPERATING TIME AND CERTAIN OTHER ITEMS REQUIRE BOTH AVERAGE AND MAXIMUM VALUES.
5. FOR GENERAL INFORMATION REFER TO "GENERAL INSTRUCTIONS FOR PERMIT APPLICATIONS," APC-201.

DEFINITIONS

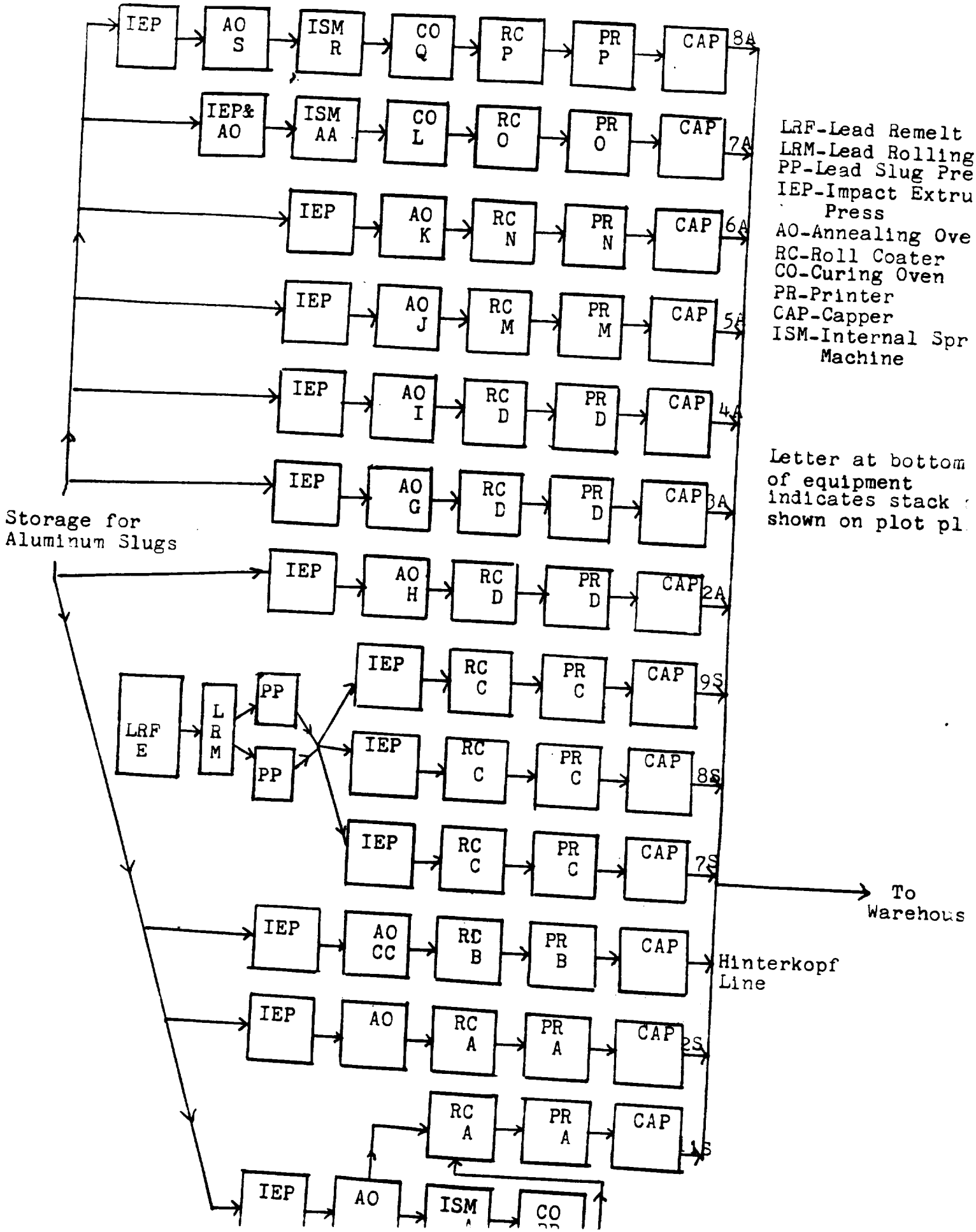
AVERAGE - THE VALUE THAT SUMMARIZES OR REPRESENTS THE GENERAL CONDITION OF THE EMISSION SOURCE, OR THE GENERAL STATE OF PRODUCTION OF THE EMISSION SOURCE. SPECIFICALLY:
- AVERAGE OPERATING TIME - ACTUAL TOTAL HOURS OF OPERATION FOR THE PRECEDING TWELVE MONTH PERIOD.
- AVERAGE RATE - ACTUAL TOTAL QUANTITY OF "MATERIAL" FOR THE PRECEDING TWELVE MONTH PERIOD, DIVIDED BY THE AVERAGE OPERATING TIME.
- AVERAGE OPERATION - OPERATION TYPICAL OF THE PRECEDING TWELVE MONTH PERIOD, AS REPRESENTED BY AVERAGE OPERATING TIME AND AVERAGE RATES.

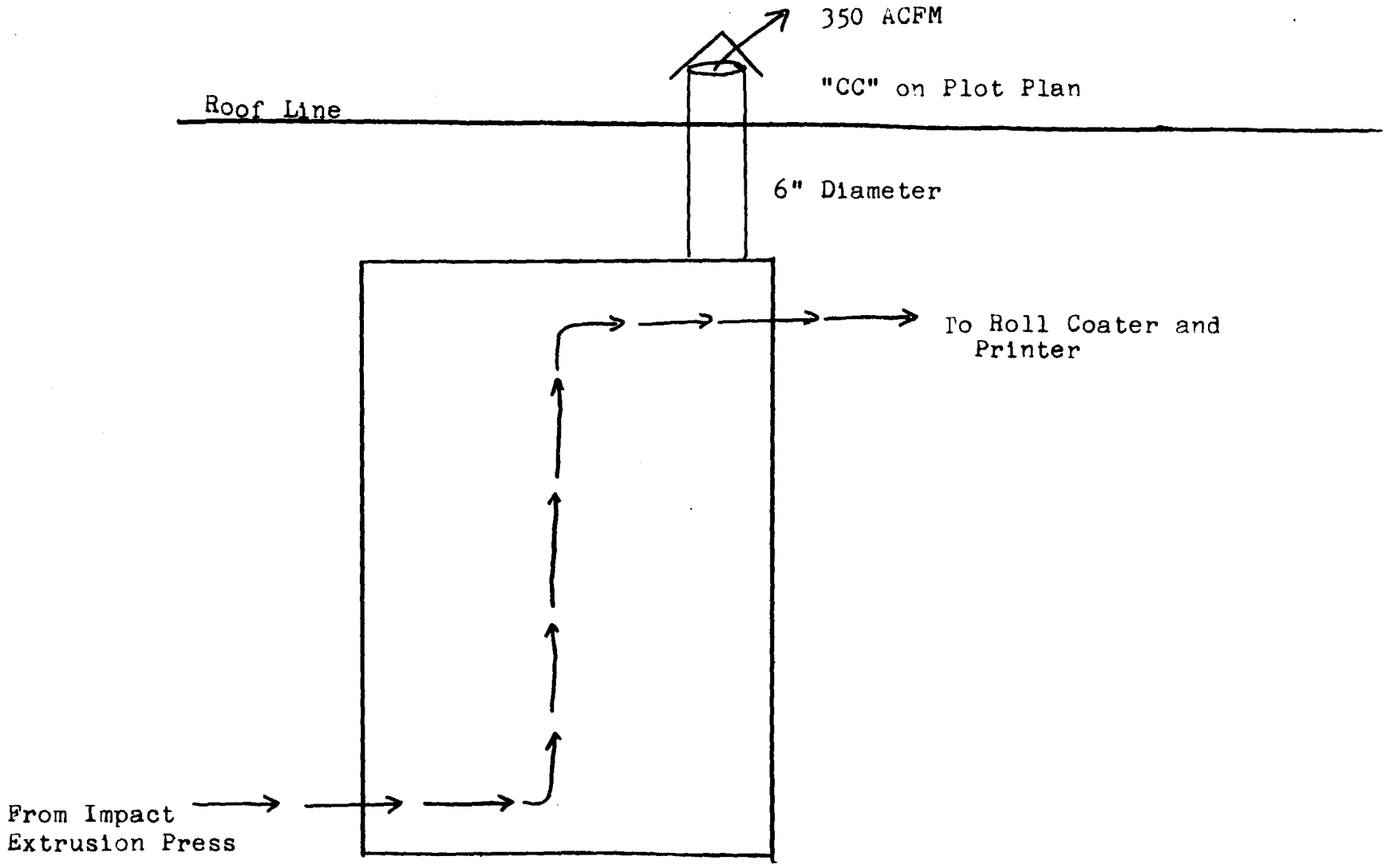
MAXIMUM - THE GREATEST VALUE ATTAINABLE OR ATTAINED FROM THE EMISSION SOURCE, OR THE PERIOD OF GREATEST OR UTMOST PRODUCTION OF THE EMISSION SOURCE. SPECIFICALLY:
- MAXIMUM OPERATING TIME - GREATEST EXPECTED TOTAL HOURS OF OPERATIONS FOR ANY TWELVE MONTH PERIOD.
- MAXIMUM RATE - GREATEST QUANTITY OF "MATERIAL" EXPECTED PER ANY ONE HOUR OF OPERATION.
- MAXIMUM OPERATION - GREATEST EXPECTED OPERATION, AS REPRESENTED BY MAXIMUM OPERATING TIME AND MAXIMUM RATES.



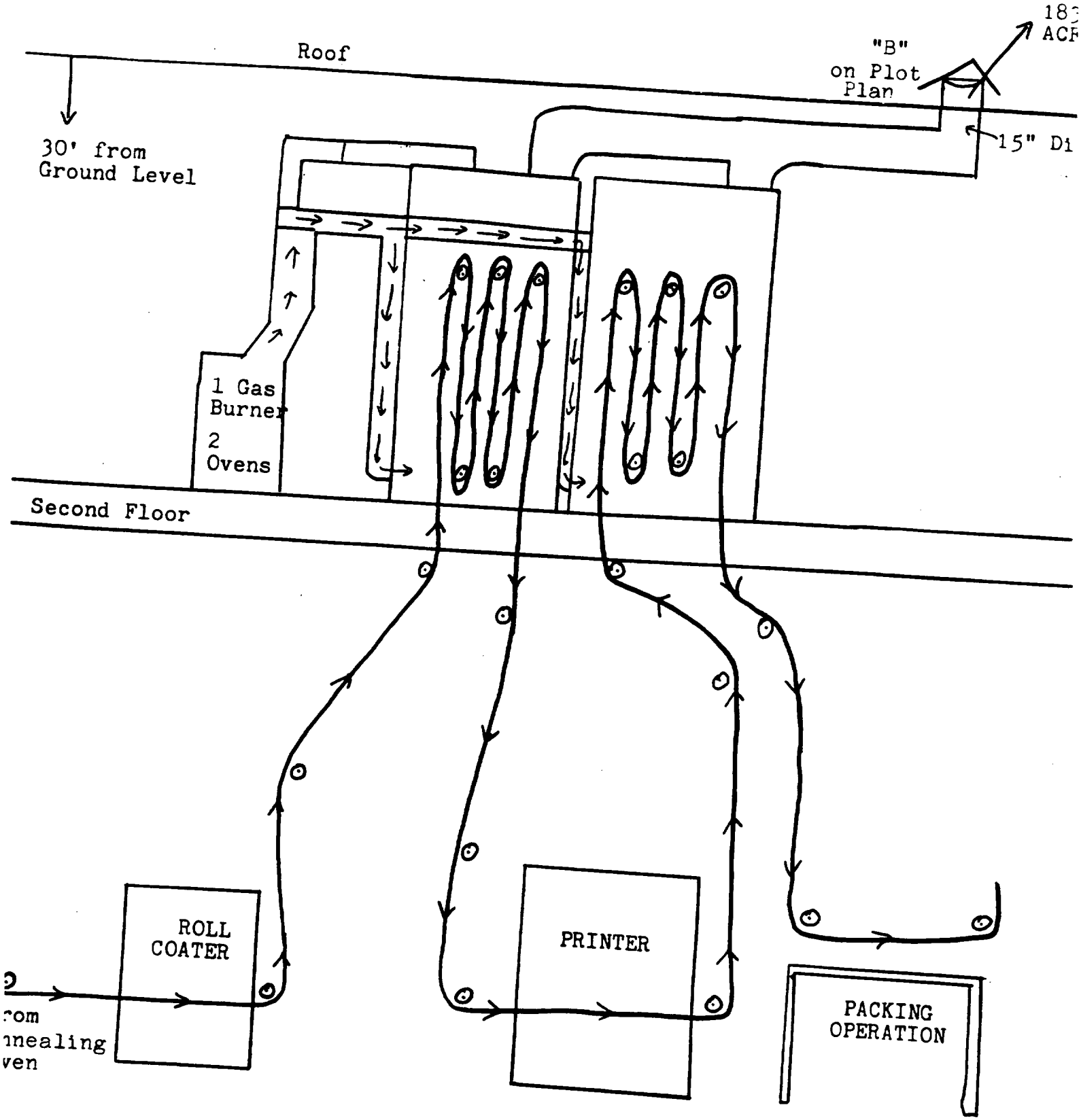
J. L. CLARK - ATLAS TUBE DIVISION
PLOT PLAN

J. L. CLARK - ATLAS TUBE DIVISION
FLOW DIAGRAM





HINTERKOPF LINE ANNEALING OVEN FLOW DIAGRAM



HINTERKOPF ROLL COATER AND PRINTER
FLOW DIAGRAM

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62706

This Agency is authorized to require this information under Illino Revised Statutes, 1979, Chapter 111 1/2, Section 1039. Disc of this information is required under that Section. Failure to do s prevent this form from being processed and could result in your application being denied. This form has been approved by the Fc Management Center.

DISPOSITION OF WASTE MATERIALS(A)

NAME OF EQUIPMENT OR PROCESS TO BE CONSTRUCTED OR OPERATED (B) Hinterkopf Aluminum Tube Line

FOR AGENCY USE ONLY

REFERENCE I.D. NO. _____

REFERENCE PERMIT NO. _____

DATE _____

1a. NAME OF OWNER: CLARCOR, Inc.	2a. NAME OF OPERATOR: J. L. Clark
1b. STREET ADDRESS OF OWNER: 2323 Sixth Street	2b. STREET ADDRESS OF OPERATOR: 2300 Sixth Street
1c. CITY OF OWNER: Rockford	2c. CITY OF OPERATOR: Rockford
1d. STATE OF OWNER: IL / 1e. ZIP CODE: 61104	2d. STATE OF OPERATOR: IL / 2e. ZIP CODE: 61104

3a. NAME OF CORPORATE DIVISION OR PLANT: Atlas Tube Division		3b. STREET ADDRESS OF EMISSION SOURCE: 2300 Wisconsin Avenue		
3c. CITY OF EMISSION SOURCE: Downers Grove	3d. LOCATED WITHIN CITY LIMITS: [X] YES [ ] NO	3e. TOWNSHIP: Lisle	3f. COUNTY: DuPage	3g. ZIP CODE: 60515

4. ALL CORRESPONDENCE TO: (NAME OF INDIVIDUAL) James K. Klotz	5. TELEPHONE NUMBER FOR AGENCY TO CALL: 815/962-8861
6. ADDRESS FOR CORRESPONDENCE: (CHECK ONLY ONE) [ ] OWNER [X] OPERATOR [ ] EMISSION SOURCE	7. YOUR ID NUMBER FOR THIS APPLICATION:(C) 3500

(A) THIS FORM IS TO BE COMPLETED FOR ANY STATIONARY EMISSION SOURCE THAT WILL RESULT IN THE PRODUCTION OF WASTE MATERIAL THAT MAY BE DISPOSED OF IN A MANNER THAT MAY CAUSE OR TEND TO CAUSE POLLUTION IN ILLINOIS EITHER ALONE OR IN COMBINATION WITH MATTER FROM OTHER SOURCES OR SO AS TO VIOLATE REGULATIONS OR STANDARDS ADOPTED BY THE POLLUTION CONTROL BOARD UNDER THE ENVIRONMENTAL PROTECTION ACT.

(B) ENTER INFORMATION HERE FROM COMPARABLE BLOCK ON APC-200 - "APPLICATION FOR A PERMIT".

(C) ENTER INFORMATION IN ITEM 7 ABOVE SAME AS ITEM 7 APC-200 - "APPLICATION FOR A PERMIT".

(D) IF ADDITIONAL SPACE IS REQUIRED USE ADDITIONAL SHEETS, ATTACH AND IDENTIFY INFORMATION BY APPROPRIATE BLOCK NUMBER AS IT APPEARS ON THIS FORM.

THIS ADDENDUM WILL BE REVIEWED BY THE DIVISION OF LAND POLLUTION CONTROL AND THE OWNER WILL BE NOTIFIED WHETHER OR NOT A DETAILED APPLICATION FOR A PERMIT WILL NEED TO BE SUBMITTED. THIS FORM APC-103 - "DISPOSITION OF SOLID WASTE") IN ITSELF SHALL NOT BE CONSIDERED TO BE AN APPLICATION FOR A PERMIT. PROPER APPLICATION FOR PERMIT FORMS WILL BE MAILED TO YOU BY THE DIVISION OF LAND POLLUTION CONTROL, IF IT IS DEEMED THAT THE FACILITY REQUIRES A PERMIT.

8. BRIEFLY DESCRIBE THE PROCESS WHICH WILL RESULT IN THE PRODUCTION OF WASTE MATERIAL:
Waste will be generated as roll coater and printer are cleaned with solvent for wash-up.

9. DESCRIBE THE STATE OF THE WASTE MATERIAL (SLURRY, CAKE, FINE ASH, CINDERS, POWDER, SLUDGE, WATER SUSPENDED, ETC.) AT THE APPLICANT'S PROPOSED DISPOSAL SITE:

Solvent liquid waste with coating pigment and solids suspended in solution.

10. FOR THE WASTE STATE THE CHEMICAL COMPOSITION, EXPRESSED AS WEIGHT PERCENTAGES OF SOLID WASTE OR IN MILLIGRAMS PER LITER FOR LIQUIDS:

Waste material is approximately 85% solvent and 15% solids.

10a. STATE VOLUME & WEIGHT OF THE WASTE GENERATED BY THIS OPERATION:
DAILY _____/DAY WEEKLY _____/WK MONTHLY 20 gal/MO. YEARLY _____/YR OTHER _____ EXPLAIN

11a. WILL THE WASTE MATERIAL BE DEPOSITED IN A SANITARY LANDFILL PERMITTED BY THE ENVIRONMENTAL PROTECTION AGENCY?

☐ YES ☒ NO

11b. IF THE ANSWER TO 1a IS "YES", STATE THE NAME AND AGENCY SUPPLEMENTAL PERMIT NUMBER OF SUCH SITE.

NAME _____ SUPPLEMENTAL PERMIT NO. _____

12a. WILL THE WASTE MATERIAL BE STORED OR PROCESS AT THE APPLICANT PLANT OR PREMISES? ☐ YES ☒ NO

12b. IF THE ANSWER TO 12a IS "YES", EXPLAIN.

Waste material will not be held on site for more than 90 days as per generator hazardous waste standards

13a. WILL THE WASTE MATERIAL BE TRANSPORTED TO A REMOTE SITE FOR STORAGE, PROCESSING, OR DISPOSAL? ☒ YES ☐ NO

13b. IF THE ANSWER TO 13a IS "YES", EXPLAIN.

Material is collected in 55 gallong steel drums and transported to Avganic Industries, Cottage Grove, Wisconsin for distillation

14a. WILL THE WASTE MATERIAL BE INCINERATED? ☐ YES ☒ NO

14b. IF THE ANSWER TO 14a IS "YES", EXPLAIN.

The solvent portion is fractionated and reclaimed. The still bottoms are processed as secondary fuel for several cement kilns.

15a. IF THE WASTE WILL BE DISPOSED OR UTILIZED IN A MANNER NOT OTHERWISE DESCRIBED, STATE THE METHOD OF UTILIZATION OR DISPOSAL TO BE USED AND THE OWNER AND LOCATION OF THE DISPOSAL OR PROCESSING FACILITY AND EXPLAIN.

PLANT VOC EMISSIONS & PROJECTIONS

Actual Emissions January 1 to March 31, 1988

Material	#/Gal. VOC	Gallons Used	# VOC Emitted
Hanna XR 3204B	6.09	240	1461.6
Hanna XR 3784A	4.69	895	4197.6
Hanna XR 1215	6.30	111	699.3
Hanna XR 3817	5.10	88	448.8
Hanna VL8M-80754	6.68	24	160.3
Hanna VY8M-80152	4.58	23	105.3
Sherwin Williams G72-WC-18	4.70	1469	6904.3
Watson Standard 10-084A	5.60	325	1820.0
Petro Products 2300	7.62	157	1196.3
Petro Products MEK	6.71	230	1543.3
Valspar S3846-006	5.40	8	43.2
			18580.0

Of this total, 415 gallons of wash-up materials were shipped off-site for distillation. This reduces the above emissions by 415 x 6.9#/gal. VOC	-	2863.5
		15716.5
Anticipated Second Quarter Emissions		15716.5
Anticipated Hinterkopf line emissions prior to start-up of thermal oxidizer	-	819.0
Anticipated Third Quarter Emissions prior to start-up of thermal oxidizer (one week plant shutdown)	-	3929.1
Total Uncontrolled Emissions Prior to Oxidizer Start-up	-	36181.1

PLANT VOC EMISSIONS & PROJECTIONS (Cont'd.)

Anticipated August-September Emissions - incinerated at 95% efficiency x (10477 + 1404 new line)	=	594.0
Anticipated October Emissions - incinerated at 95% efficiency x 5706.7 (1/3 of Third Quarter)	=	285.3
Anticipated November-December Emissions uncontrollable under Section 215.106	=	11413.3
Total Anticipated 1988 Emissions	=	48473.7 (24.2 tons)

Based on the above program, emissions from this facility could be controlled under 25 tons for the year. For this reason, the facility should be permitted to operate the Hinterkopf line prior to the start-up of the thermal oxidizer. Note: Additional reduction could be achieved this year only by operation of the thermal oxidizer during the November-December period.

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62706

COMPLIANCE PROGRAM AND
PROJECT COMPLETION SCHEDULE

NAME OF EQUIPMENT TO BE CONSTRUCTED OR MODIFIED: Hinterkopf Aluminum Tube Line (A)

FOR AGENCY USE ONLY

I. D. NO. _____

PERMIT NO. _____

DATE _____

1a. NAME OF OWNER: CLARCOR, Inc.	2a. NAME OF OPERATOR: J. L. Clark
1b. STREET ADDRESS OF OWNER: 2323 Sixth Street	2b. STREET ADDRESS OF OPERATOR: 2300 Sixth Street
1c. CITY OF OWNER: Rockford	2c. CITY OF OPERATOR: Rockford
1d. STATE OF OWNER: IL / 1e. ZIP CODE: 61104	2d. STATE OF OPERATOR: IL / 2e. ZIP CODE: 61104

3a. NAME OF CORPORATE DIVISION OR PLANT: Atlas Tube Division		3b. STREET ADDRESS OF EMISSION SOURCE: 2300 Wisconsin Avenue		
3c. CITY OF EMISSION SOURCE: Downers Grove	3d. LOCATED WITHIN CITY LIMITS ☒ YES ☐ NO	3e. TOWNSHIP: Lisle	3f. COUNTY: DuPage	3g. ZIP CODE: 60515

4. ALL CORRESPONDENCE TO: (NAME OF INDIVIDUAL) James K. Klotz	5. TELEPHONE NUMBER FOR AGENCY TO CALL: 815/962-8861

6. ADDRESS FOR CORRESPONDENCE:
☐ OWNER ☒ OPERATOR ☐ EMISSION SOURCE

THE UNDERSIGNED HEREBY CERTIFIES THAT THE STATEMENTS CONTAINED HEREIN ARE CORRECT AND CURRENT. BY AFFIXING MY SIGNATURE HERETO I FURTHER CERTIFY THAT I AM AUTHORIZED TO EXECUTE THIS DOCUMENT.

AUTHORIZED SIGNATURE(S): (B)

7. BY Richard W. Malmgren (SIGNATURE) 4/19/88 (DATE)
Richard W. Malmgren (TYPED OR PRINTED NAME OF SIGNER)
Executive Vice President (TITLE OF SIGNER)

BY Ronald A. Moreau (SIGNATURE) 4-19-88 (DATE)
Ronald A. Moreau (TYPED OR PRINTED NAME OF SIGNER)
Vice President - Manufacturing (TITLE OF SIGNER)

(A) THIS FORM IS TO PROVIDE THE AGENCY WITH GENERAL INFORMATION ABOUT THE COMPLIANCE PROGRAM. CLEARLY IDENTIFY THE GENERIC NAME OF ANY EQUIPMENT TO BE CONSTRUCTED OR MODIFIED PURSUANT TO THIS PLAN.

(B) THIS MUST BE SIGNED IN ACCORDANCE WITH PCB REGS., CHAPTER 2, PART 1, RULE 104(c)(2). IF THE PERSON SIGNING THE COMPLIANCE PROGRAM AND PROJECT COMPLETION SCHEDULE IS AUTHORIZED TO DO SO BY A RESOLUTION OF THE BOARD OF DIRECTORS, SUCH AUTHORIZATION WILL USUALLY COMPLY WITH THE BEFORE-MENTIONED RULE.

GENERAL INFORMATION

8. THE APPLICANT MUST SUBMIT A PROCESS FLOW DIAGRAM DEPICTING ALL RELATED EMISSION SOURCES AND ALL RELATED AIR POLLUTION CONTROL EQUIPMENT. THE DIAGRAM SHALL INCLUDE LABELS FOR EACH SOURCE AND EACH ITEM OF POLLUTION CONTROL EQUIPMENT, AND SHALL SET FORTH MAXIMUM FLOW RATES FOR (1) ALL RELATED PROCESSING EQUIPMENT, (2) ALL RELATED AIR POLLUTION CONTROL EQUIPMENT, (3) ALL RELATED EMISSION SOURCES AND (4) ALL RELATED STACKS OR VENTS. IF A PROCESS FLOW DIAGRAM HAS BEEN SUBMITTED WITH A PREVIOUS APPLICATION, THE APPLICANT MUST REFERENCE SUCH APPLICATION:

PERMIT NO.: 7 3 0 3 0 5 3 5 I.D. NO.: 0 4 3 0 3 0 A A R

9. THE APPLICANT SHALL SUBMIT A DETAILED DESCRIPTION OF THE EQUIPMENT HE PROPOSES TO CONSTRUCT TO COMPLY WITH THE ENVIRONMENTAL PROTECTION ACT AND APPLICABLE REGULATIONS. THIS DESCRIPTION SHALL INCLUDE THE FOLLOWING: THE TYPE OF PROPOSED AIR POLLUTION CONTROL EQUIPMENT OR PROPOSED AIR POLLUTION CONTROL TECHNIQUE WHICH HAS BEEN CHOSEN TO ACHIEVE COMPLIANCE: THE COST, AVAILABILITY, AND TECHNICAL REASONABLENESS OF THE PROPOSED AIR POLLUTION CONTROL EQUIPMENT OR PROPOSED AIR POLLUTION CONTROL TECHNIQUE, INCLUDING DETAILED COST ANALYSES AND COPIES OF ENGINEERING REPORTS OR STUDIES SUFFICIENT TO PROVE TO THE AGENCY THAT THIS OPERATION WILL BE IN COMPLIANCE WITH THE ACT AND APPLICABLE REGULATIONS. THIS EQUIPMENT SHALL BE CLEARLY LABELED ON THE PROCESS FLOW DIAGRAM.

10. COMPLETE ALL OF COLUMNS A AND B. COMPLETE COLUMN C AS APPLICABLE.

	A EXPECTED DATE ACTIVITY WILL BE COMPLETED	B LATEST DATE ACTIVITY WILL BE COMPLETED*	C ACTUAL DATE ACTIVITY WAS COMPLETED
a. STATE DATE THE APPLICANT WILL ENTER INTO A BINDING AGREEMENT TO MAKE NECESSARY PURCHASES OR MODIFICATIONS.			10/30/87
b. STATE DATE THE APPLICANT WILL APPLY FOR A CONSTRUCTION PERMIT FOR THE PROPOSED EQUIPMENT OR MODIFICATION OF EQUIPMENT.	4/15/88	4/22/88	4/20/88
c. STATE DATE THIS ITEM OF EQUIPMENT WILL BE DELIVERED (IF PRESENT EQUIPMENT IS TO BE MODIFIED, STATE DATE SUCH MODIFICATION SHALL BEGIN) TO THE APPLICANT'S FACILITY.	4/22/88	4/30/88	
d. STATE DATE CONSTRUCTION OR MODIFICATION OF EQUIPMENT WILL BE COMPLETED.	5/09/88	5/14/88	
e. STATE DATE APPLICANT WILL TEST EQUIPMENT TO DEMONSTRATE COMPLIANCE WITH THE ENVIRONMENTAL PROTECTION ACT AND SUBSTANTIVE REGULATIONS PROMULGATED THEREUNDER. *	5/09/88	5/31/88	
f. STATE DATE EQUIPMENT WILL BE FULLY OPERATIONAL.	5/16/88	5/31/88	

NOTE: THE TIME BETWEEN THE SUBMISSION OF THIS FORM AND THE INITIAL EVENT LISTED IN ITEM 10 SHALL NOT EXCEED 6 MONTHS. THE TIME BETWEEN ANY TWO CONSECUTIVE EVENTS LISTED IN ITEM 10 SHALL NOT EXCEED 6 MONTHS.

*THE FINAL COMPLIANCE DATE SHALL BE NO LATER THAN THE APPLICABLE DATE SET FORTH IN PCB REGS., CHAPTER 2: AIR POLLUTION.

11. A PROJECT COMPLETION REPORT, APC-271, MUST BE SUBMITTED TO THE AGENCY FOR EACH INTERIM AND FINAL COMPLIANCE DATE LISTED IN COLUMN B. SUCH PROJECT COMPLETION REPORT MUST BE RECEIVED BY THE AGENCY NO LATER THAN 30 DAYS AFTER THE APPLICABLE INTERIM OR FINAL COMPLIANCE DATE.

*Date that production line will be ready for debugging. Actual emission controls will not be in place until July. See emission summary on Page 18-19.

CERTIFIED RESOLUTION

I, M. C. Arne, do hereby certify that I am the duly elected, qualified and acting Secretary of CLARCOR Inc., a Corporation duly organized and existing under the laws of the State of Delaware and that the following is a true, correct and complete copy of a resolution duly adopted by the Board of Directors of CLARCOR Inc. (J. L. Clark Manufacturing Co.) on November 28, 1978, at a special meeting of the Board, and that said resolution remains in force and effect at the date hereof, not having been altered, amended, or repealed in any respect whatsoever:

> "WHEREAS, The State of Illinois Environmental Protection Agency requires that a corporation applying for a permit to install pollution control equipment file with them a certified copy of a resolution of its Board of Directors authorizing individuals to execute operating permit applications and to cause or allow the construction, modification and operation of the equipment covered by the permit.
>
> BE IT HEREBY RESOLVED, That the President or a Vice President of J. L. Clark Manufacturing Co. be authorized to sign such permits and to cause or allow the construction, modification and operation of the equipment covered by such permits, and
>
> BE IT FURTHER RESOLVED, That the Secretary be instructed to file a certified copy of this resolution with the proper authorities."

IN WITNESS WHEREOF, I have hereunto set my hand and the seal of CLARCOR Inc. this 18th day of March, 1988.

M. C. Arne

Secretary
CLARCOR Inc.

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62706

This Agency is authorized to require this information under Illinois Revised Statutes, 1979, Chapter 111 1/2, Section 1039. Disclosure of this information is required under that Section. Failure to do so may prevent this form from being processed and could result in your application being denied. This form has been approved by the Forms Management Center.

*DATA AND INFORMATION PROCESS EMISSION SOURCE	

*THIS INFORMATION FORM IS TO BE COMPLETED FOR AN EMISSION SOURCE OTHER THAN A FUEL COMBUSTION EMISSION SOURCE OR AN INCINERATOR. A FUEL COMBUSTION EMISSION SOURCE IS A FURNACE, BOILER, OR SIMILAR EQUIPMENT USED PRIMARILY FOR PRODUCING HEAT OR POWER BY INDIRECT HEAT TRANSFER. AN INCINERATOR IS AN APPARATUS IN WHICH REFUSE IS BURNED.

1. NAME OF PLANT OWNER: CLARCOR	2. NAME OF CORPORATE DIVISION OR PLANT (IF DIFFERENT FROM OWNER): J.L.Clark - Atlas Tube Division
3. STREET ADDRESS OF EMISSION SOURCE: 2300 Wisconsin Avenue	4. CITY OF EMISSION SOURCE: Downers Grove

GENERAL INFORMATION

5. NAME OF PROCESS: Annealing of Aluminum Tubes	6. NAME OF EMISSION SOURCE EQUIPMENT: Annealing oven	
7. EMISSION SOURCE EQUIPMENT MANUFACTURER: N/A	8. MODEL NUMBER:	9. SERIAL NUMBER:
10. FLOW DIAGRAM DESIGNATION(S) OF EMISSION SOURCE: "AO" on line 2S		
11. IDENTITY(S) OF ANY SIMILAR SOURCE(S) AT THE PLANT OR PREMISES NOT COVERED BY THE FORM (IF THE SOURCE IS COVERED BY ANOTHER APPLICATION, IDENTIFY THE APPLICATION):		
12. AVERAGE OPERATING TIME OF EMISSION SOURCE: 16 HRS/DAY 5 DAYS/WK 50 WKS/YR	13. MAXIMUM OPERATING TIME OF EMISSION SOURCE: 24 HRS/DAY 5 DAYS/WK 50 WKS/YR	
14. PERCENT OF ANNUAL THROUGHPUT: DEC-FEB 25 % MAR-MAY 25 % JUN-AUG 25 % SEPT-NOV 25 %		

INSTRUCTIONS

1. COMPLETE THE ABOVE IDENTIFICATION AND GENERAL INFORMATION SECTION.
2. COMPLETE THE RAW MATERIAL, PRODUCT, WASTE MATERIAL, AND FUEL USAGE SECTIONS FOR THE PARTICULAR SOURCE EQUIPMENT. COMPOSITIONS OF MATERIALS MUST BE SUFFICIENTLY DETAILED TO ALLOW DETERMINATION OF THE NATURE AND QUANTITY OF POTENTIAL EMISSIONS. IN PARTICULAR, THE COMPOSITION OF PAINTS, INKS, ETC., AND ANY SOLVENTS MUST BE FULLY DETAILED.
3. EMISSION AND EXHAUST POINT INFORMATION MUST BE COMPLETED, UNLESS EMISSIONS ARE EXHAUSTED THROUGH AIR POLLUTION CONTROL EQUIPMENT.
4. OPERATING TIME AND CERTAIN OTHER ITEMS REQUIRE BOTH AVERAGE AND MAXIMUM VALUES.
5. FOR GENERAL INFORMATION REFER TO "GENERAL INSTRUCTIONS FOR PERMIT APPLICATIONS," APC-201.

DEFINITIONS

AVERAGE - THE VALUE THAT SUMMARIZES OR REPRESENTS THE GENERAL CONDITION OF THE EMISSION SOURCE, OR THE GENERAL STATE OF PRODUCTION OF THE EMISSION SOURCE. SPECIFICALLY:
AVERAGE OPERATING TIME - ACTUAL TOTAL HOURS OF OPERATION FOR THE PRECEDING TWELVE MONTH PERIOD.
AVERAGE RATE - ACTUAL TOTAL QUANTITY OF "MATERIAL" FOR THE PRECEDING TWELVE MONTH PERIOD, DIVIDED BY THE AVERAGE OPERATING TIME.
AVERAGE OPERATION - OPERATION TYPICAL OF THE PRECEDING TWELVE MONTH PERIOD, AS REPRESENTED BY AVERAGE OPERATING TIME AND AVERAGE RATES.

MAXIMUM - THE GREATEST VALUE ATTAINABLE OR ATTAINED FROM THE EMISSION SOURCE, OR THE PERIOD OF GREATEST OR UTMOST PRODUCTION OF THE EMISSION SOURCE. SPECIFICALLY:
MAXIMUM OPERATING TIME - GREATEST EXPECTED TOTAL HOURS OF OPERATIONS FOR ANY TWELVE MONTH PERIOD.
MAXIMUM RATE - GREATEST QUANTITY OF "MATERIAL" EXPECTED PER ANY ONE HOUR OF OPERATION.
MAXIMUM OPERATION - GREATEST EXPECTED OPERATION, AS REPRESENTED BY MAXIMUM OPERATING TIME AND MAXIMUM RATES.

RAW MATERIAL INFORMATION		
NAME OF RAW MATERIAL	AVERAGE RATE PER IDENTICAL SOURCE	MAXIMUM RATE PER IDENTICAL SOURCE
20a. Aluminum Tube	b. 60.8 LB/HR	c. 63.4 LB/HR
21a.	b. LB/HR	c. LB/HR
22a.	b. LB/HR	c. LB/HR
23a.	b. LB/HR	c. LB/HR
24a.	b. LB/HR	c. LB/HR

PRODUCT INFORMATION		
NAME OF PRODUCT	AVERAGE RATE PER IDENTICAL SOURCE	MAXIMUM RATE PER IDENTICAL SOURCE
30a. Annealed Aluminum Tube	b. 60.8 LB/HR	c. 63.4 LB/HR
31a.	b. LB/HR	c. LB/HR
32a.	b. LB/HR	c. LB/HR
33a.	b. LB/HR	c. LB/HR
34a.	b. LB/HR	c. LB/HR

WASTE MATERIAL INFORMATION		
NAME OF WASTE MATERIAL	AVERAGE RATE PER IDENTICAL SOURCE	MAXIMUM RATE PER IDENTICAL SOURCE
40a. None	b. LB/HR	c. LB/HR
41a.	b. LB/HR	c. LB/HR
42a.	b. LB/HR	c. LB/HR
43a.	b. LB/HR	c. LB/HR
44a.	b. LB/HR	c. LB/HR

*FUEL USAGE INFORMATION		
FUEL USED	TYPE	HEAT CONTENT
50a. NATURAL GAS ☐	b.	c. 1000 BTU/SCF
OTHER GAS ☐		BTU/SCF
OIL ☐		BTU/GAL
COAL ☐		BTU/LB
OTHER ☒	Electric	BTU/LB
d. AVERAGE FIRING RATE PER IDENTICAL SOURCE: BTU/HR	e. MAXIMUM FIRING RATE PER IDENTICAL SOURCE: BTU/HR	

*THIS SECTION IS TO BE COMPLETED FOR ANY FUEL USED DIRECTLY IN THE PROCESS EMISSION SOURCE, E.G. GAS IN A DRYER, OR COAL IN A MELT FURNACE.

*EMISSION INFORMATION			
51. NUMBER OF IDENTICAL SOURCES (DESCRIBE AS REQUIRED): One			
AVERAGE OPERATION			
CONTAMINANT	CONCENTRATION OR EMISSION RATE PER IDENTICAL SOURCE		METHOD USED TO DETERMINE CONCENTRATION OR EMISSION RATE
PARTICULATE MATTER	52a. GR/SCF	b. LB/HR	c.
CARBON MONOXIDE	53a. PPM (VOL)	b. LB/HR	c.
NITROGEN OXIDES	54a. PPM (VOL)	b. LB/HR	c.
ORGANIC MATERIAL	55a. PPM (VOL)	b. LB/HR	c.
SULFUR DIOXIDE	56a. PPM (VOL)	b. LB/HR	c.
**OTHER (SPECIFY)	57a. PPM (VOL)	b. LB/HR	c.
MAXIMUM OPERATION			
CONTAMINANT	CONCENTRATION OR EMISSION RATE PER IDENTICAL SOURCE		METHOD USED TO DETERMINE CONCENTRATION OR EMISSION RATE
PARTICULATE MATTER	58a. GR/SCF	b. LB/HR	c.
CARBON MONOXIDE	59a. PPM (VOL)	b. LB/HR	c.
NITROGEN OXIDES	60a. PPM (VOL)	b. LB/HR	c.
ORGANIC MATERIAL	61a. PPM (VOL)	b. LB/HR	c.
SULFUR DIOXIDE	62a. PPM (VOL)	b. LB/HR	c.
**OTHER (SPECIFY)	63a. PPM (VOL)	b. LB/HR	c.

*ITEMS 52 THROUGH 63 NEED NOT BE COMPLETED IF EMISSIONS ARE EXHAUSTED THROUGH AIR POLLUTION CONTROL EQUIPMENT.
**"OTHER" CONTAMINANT SHOULD BE USED FOR AN AIR CONTAMINANT NOT SPECIFICALLY NAMED ABOVE. POSSIBLE OTHER CONTAMINANTS ARE ASBESTOS, BERYLLIUM, MERCURY, VINYL CHLORIDE, LEAD, ETC.

***EXHAUST POINT INFORMATION	
64. FLOW DIAGRAM DESIGNATION(S) OF EXHAUST POINT: No external exhaust	
65. DESCRIPTION OF EXHAUST POINT (LOCATION IN RELATION TO BUILDINGS, DIRECTION, HOODING, ETC.):	
66. EXIT HEIGHT ABOVE GRADE:	67. EXIT DIAMETER:
68. GREATEST HEIGHT OF NEARBY BUILDINGS: FT	69. EXIT DISTANCE FROM NEAREST PLANT BOUNDARY: FT
AVERAGE OPERATION	MAXIMUM OPERATION
70. EXIT GAS TEMPERATURE: °F	72. EXIT GAS TEMPERATURE: °F
71. GAS FLOW RATE THROUGH EACH EXIT: ACFM	73. GAS FLOW RATE THROUGH EACH EACH EXIT: ACFM

***THIS SECTION SHOULD NOT BE COMPLETED IF EMISSIONS ARE EXHAUSTED THROUGH AIR POLLUTION CONTROL EQUIPMENT.

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62706

This Agency is authorized to require this information under Illinois Revised Statutes, 1979, Chapter 111 1/2, Section 1039. Disclosure of this information is required under that Section. Failure to do so may prevent this form from being processed and could result in your application being denied. This form has been approved by the Forms Management Center.

*DATA AND INFORMATION PROCESS EMISSION SOURCE	

*THIS INFORMATION FORM IS TO BE COMPLETED FOR AN EMISSION SOURCE OTHER THAN A FUEL COMBUSTION EMISSION SOURCE OR AN INCINERATOR. A FUEL COMBUSTION EMISSION SOURCE IS A FURNACE, BOILER, OR SIMILAR EQUIPMENT USED PRIMARILY FOR PRODUCING HEAT OR POWER BY INDIRECT HEAT TRANSFER. AN INCINERATOR IS AN APPARATUS IN WHICH REFUSE IS BURNED.

1. NAME OF PLANT OWNER: CLARCOR	2. NAME OF CORPORATE DIVISION OR PLANT (IF DIFFERENT FROM OWNER): J.L.Clark-Atlas Tube Division
3. STREET ADDRESS OF EMISSION SOURCE: 2300 Wisconsin Avenue	4. CITY OF EMISSION SOURCE: Downers Grove

GENERAL INFORMATION

5. NAME OF PROCESS: Annealing of Aluminum Tubes	6. NAME OF EMISSION SOURCE EQUIPMENT: Annealing oven	
7. EMISSION SOURCE EQUIPMENT MANUFACTURER: N/A	8. MODEL NUMBER:	9. SERIAL NUMBER:
10. FLOW DIAGRAM DESIGNATION(S) OF EMISSION SOURCE: "AO" on line 1S		
11. IDENTITY(S) OF ANY SIMILAR SOURCE(S) AT THE PLANT OR PREMISES NOT COVERED BY THE FORM (IF THE SOURCE IS COVERED BY ANOTHER APPLICATION, IDENTIFY THE APPLICATION): None		
12. AVERAGE OPERATING TIME OF EMISSION SOURCE: 16 HRS/DAY 5 DAYS/WK 50 WKS/YR	13. MAXIMUM OPERATING TIME OF EMISSION SOURCE: 24 HRS/DAY 5 DAYS/WK 50 WKS/YR	
14. PERCENT OF ANNUAL THROUGHPUT: DEC-FEB 25 % MAR-MAY 25 % JUN-AUG 25 % SEPT-NOV 25 %		

INSTRUCTIONS

1. COMPLETE THE ABOVE IDENTIFICATION AND GENERAL INFORMATION SECTION.
2. COMPLETE THE RAW MATERIAL, PRODUCT, WASTE MATERIAL, AND FUEL USAGE SECTIONS FOR THE PARTICULAR SOURCE EQUIPMENT. COMPOSITIONS OF MATERIALS MUST BE SUFFICIENTLY DETAILED TO ALLOW DETERMINATION OF THE NATURE AND QUANTITY OF POTENTIAL EMISSIONS. IN PARTICULAR, THE COMPOSITION OF PAINTS, INKS, ETC., AND ANY SOLVENTS MUST BE FULLY DETAILED.
3. EMISSION AND EXHAUST POINT INFORMATION MUST BE COMPLETED, UNLESS EMISSIONS ARE EXHAUSTED THROUGH AIR POLLUTION CONTROL EQUIPMENT.
4. OPERATING TIME AND CERTAIN OTHER ITEMS REQUIRE BOTH AVERAGE AND MAXIMUM VALUES.
5. FOR GENERAL INFORMATION REFER TO "GENERAL INSTRUCTIONS FOR PERMIT APPLICATIONS," APC-201.

DEFINITIONS

AVERAGE - THE VALUE THAT SUMMARIZES OR REPRESENTS THE GENERAL CONDITION OF THE EMISSION SOURCE, OR THE GENERAL STATE OF PRODUCTION OF THE EMISSION SOURCE. SPECIFICALLY:

AVERAGE OPERATING TIME - ACTUAL TOTAL HOURS OF OPERATION FOR THE PRECEDING TWELVE MONTH PERIOD.

AVERAGE RATE - ACTUAL TOTAL QUANTITY OF "MATERIAL" FOR THE PRECEDING TWELVE MONTH PERIOD, DIVIDED BY THE AVERAGE OPERATING TIME.

AVERAGE OPERATION - OPERATION TYPICAL OF THE PRECEDING TWELVE MONTH PERIOD, AS REPRESENTED BY AVERAGE OPERATING TIME AND AVERAGE RATES.

MAXIMUM - THE GREATEST VALUE ATTAINABLE OR ATTAINED FROM THE EMISSION SOURCE, OR THE PERIOD OF GREATEST OR UTMOST PRODUCTION OF THE EMISSION SOURCE. SPECIFICALLY:

MAXIMUM OPERATING TIME - GREATEST EXPECTED TOTAL HOURS OF OPERATIONS FOR ANY TWELVE MONTH PERIOD.

MAXIMUM RATE - GREATEST QUANTITY OF "MATERIAL" EXPECTED PER ANY ONE HOUR OF OPERATION.

MAXIMUM OPERATION - GREATEST EXPECTED OPERATION, AS REPRESENTED BY MAXIMUM OPERATING TIME AND MAXIMUM RATES.

RAW MATERIAL INFORMATION		
NAME OF RAW MATERIAL	AVERAGE RATE PER IDENTICAL SOURCE	MAXIMUM RATE PER IDENTICAL SOURCE
20a. Aluminum Tube	b. 54.3 LB/HR	c. 57.6 LB/HR
21a.	b. LB/HR	c. LB/HR
22a.	b. LB/HR	c. LB/HR
23a.	b. LB/HR	c. LB/HR
24a.	b. LB/HR	c. LB/HR

PRODUCT INFORMATION		
NAME OF PRODUCT	AVERAGE RATE PER IDENTICAL SOURCE	MAXIMUM RATE PER IDENTICAL SOURCE
30a. Annealed Aluminum Tube	b. 54.3 LB/HR	c. 57.6 LB/HR
31a.	b. LB/HR	c. LB/HR
32a.	b. LB/HR	c. LB/HR
33a.	b. LB/HR	c. LB/HR
34a.	b. LB/HR	c. LB/HR

WASTE MATERIAL INFORMATION		
NAME OF WASTE MATERIAL	AVERAGE RATE PER IDENTICAL SOURCE	MAXIMUM RATE PER IDENTICAL SOURCE
40a.	b. LB/HR	c. LB/HR
41a.	b. LB/HR	c. LB/HR
42a.	b. LB/HR	c. LB/HR
43a.	b. LB/HR	c. LB/HR
44a.	b. LB/HR	c. LB/HR

*FUEL USAGE INFORMATION		
FUEL USED	TYPE	HEAT CONTENT
50a. NATURAL GAS ☐	b. ———	c. 1000 BTU/SCF
OTHER GAS ☐		BTU/SCF
OIL ☐		BTU/GAL
COAL ☐		BTU/LB
OTHER ☒	Electric	BTU/LB
d. AVERAGE FIRING RATE PER IDENTICAL SOURCE: BTU/HR	e. MAXIMUM FIRING RATE PER IDENTICAL SOURCE: BTU/HR	

*THIS SECTION IS TO BE COMPLETED FOR ANY FUEL USED DIRECTLY IN THE PROCESS EMISSION SOURCE, E.G. GAS IN A DRYER, OR COAL IN A MELT FURNACE.

*EMISSION INFORMATION			
51. NUMBER OF IDENTICAL SOURCES (DESCRIBE AS REQUIRED): One			
AVERAGE OPERATION			
CONTAMINANT	CONCENTRATION OR EMISSION RATE PER IDENTICAL SOURCE		METHOD USED TO DETERMINE CONCENTRATION OR EMISSION RATE
PARTICULATE MATTER	52a. GR/SCF	b. LB/HR	c.
CARBON MONOXIDE	53a. PPM (VOL)	b. LB/HR	c.
NITROGEN OXIDES	54a. PPM (VOL)	b. LB/HR	c.
ORGANIC MATERIAL	55a. PPM (VOL)	b. LB/HR	c.
SULFUR DIOXIDE	56a. PPM (VOL)	b. LB/HR	c.
**OTHER (SPECIFY)	57a. PPM (VOL)	b. LB/HR	c.
MAXIMUM OPERATION			
CONTAMINANT	CONCENTRATION OR EMISSION RATE PER IDENTICAL SOURCE		METHOD USED TO DETERMINE CONCENTRATION OR EMISSION RATE
PARTICULATE MATTER	58a. GR/SCF	b. LB/HR	c.
CARBON MONOXIDE	59a. PPM (VOL)	b. LB/HR	c.
NITROGEN OXIDES	60a. PPM (VOL)	b. LB/HR	c.
ORGANIC MATERIAL	61a. PPM (VOL)	b. LB/HR	c.
SULFUR DIOXIDE	62a. PPM (VOL)	b. LB/HR	c.
**OTHER (SPECIFY)	63a. PPM (VOL)	b. LB/HR	c.

*ITEMS 52 THROUGH 63 NEED NOT BE COMPLETED IF EMISSIONS ARE EXHAUSTED THROUGH AIR POLLUTION CONTROL EQUIPMENT.
**"OTHER" CONTAMINANT SHOULD BE USED FOR AN AIR CONTAMINANT NOT SPECIFICALLY NAMED ABOVE. POSSIBLE OTHER CONTAMINANTS ARE ASBESTOS, BERYLLIUM, MERCURY, VINYL CHLORIDE, LEAD, ETC.

***EXHAUST POINT INFORMATION	
64. FLOW DIAGRAM DESIGNATION(S) OF EXHAUST POINT: No external exhaust	
65. DESCRIPTION OF EXHAUST POINT (LOCATION IN RELATION TO BUILDINGS, DIRECTION, HOODING, ETC.):	
66. EXIT HEIGHT ABOVE GRADE:	67. EXIT DIAMETER:
68. GREATEST HEIGHT OF NEARBY BUILDINGS: FT	69. EXIT DISTANCE FROM NEAREST PLANT BOUNDARY: FT
AVERAGE OPERATION	MAXIMUM OPERATION
70. EXIT GAS TEMPERATURE: °F	72. EXIT GAS TEMPERATURE: °F
71. GAS FLOW RATE THROUGH EACH EXIT: ACFM	73. GAS FLOW RATE THROUGH EACH EACH EXIT: ACFM

***THIS SECTION SHOULD NOT BE COMPLETED IF EMISSIONS ARE EXHAUSTED THROUGH AIR POLLUTION CONTROL EQUIPMENT.

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62706

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*DATA AND INFORMATION PROCESS EMISSION SOURCE	

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1. NAME OF PLANT OWNER: CLARCOR	2. NAME OF CORPORATE DIVISION OR PLANT (IF DIFFERENT FROM OWNER): J.L.Clark - Atlas Tube Division
3. STREET ADDRESS OF EMISSION SOURCE: 2300 Wisconsin Avenue	4. CITY OF EMISSION SOURCE: Downers Grove

GENERAL INFORMATION

5. NAME OF PROCESS: Coating and Printing of Aluminum Tubes	6. NAME OF EMISSION SOURCE EQUIPMENT: Coaters and Printers	
7. EMISSION SOURCE EQUIPMENT MANUFACTURER: N/A	8. MODEL NUMBER:	9. SERIAL NUMBER:
10. FLOW DIAGRAM DESIGNATION(S) OF EMISSION SOURCE: Lines 1S, 2S - "ISM", "RC", "PR", "CO"		
11. IDENTITY(S) OF ANY SIMILAR SOURCE(S) AT THE PLANT OR PREMISES NOT COVERED BY THE FORM (IF THE SOURCE IS COVERED BY ANOTHER APPLICATION, IDENTIFY THE APPLICATION): None		
12. AVERAGE OPERATING TIME OF EMISSION SOURCE: 16 HRS/DAY 5 DAYS/WK 50 WKS/YR	13. MAXIMUM OPERATING TIME OF EMISSION SOURCE: 24 HRS/DAY 5 DAYS/WK 52 WKS/YR	
14. PERCENT OF ANNUAL THROUGHPUT: DEC-FEB 25 % MAR-MAY 25 % JUN-AUG 25 % SEPT-NOV 25 %		

INSTRUCTIONS

1. COMPLETE THE ABOVE IDENTIFICATION AND GENERAL INFORMATION SECTION.
2. COMPLETE THE RAW MATERIAL, PRODUCT, WASTE MATERIAL, AND FUEL USAGE SECTIONS FOR THE PARTICULAR SOURCE EQUIPMENT. COMPOSITIONS OF MATERIALS MUST BE SUFFICIENTLY DETAILED TO ALLOW DETERMINATION OF THE NATURE AND QUANTITY OF POTENTIAL EMISSIONS. IN PARTICULAR, THE COMPOSITION OF PAINTS, INKS, ETC., AND ANY SOLVENTS MUST BE FULLY DETAILED.
3. EMISSION AND EXHAUST POINT INFORMATION MUST BE COMPLETED, UNLESS EMISSIONS ARE EXHAUSTED THROUGH AIR POLLUTION CONTROL EQUIPMENT.
4. OPERATING TIME AND CERTAIN OTHER ITEMS REQUIRE BOTH AVERAGE AND MAXIMUM VALUES.
5. FOR GENERAL INFORMATION REFER TO "GENERAL INSTRUCTIONS FOR PERMIT APPLICATIONS," APC-201.

DEFINITIONS

AVERAGE - THE VALUE THAT SUMMARIZES OR REPRESENTS THE GENERAL CONDITION OF THE EMISSION SOURCE, OR THE GENERAL STATE OF PRODUCTION OF THE EMISSION SOURCE. SPECIFICALLY:

AVERAGE OPERATING TIME - ACTUAL TOTAL HOURS OF OPERATION FOR THE PRECEDING TWELVE MONTH PERIOD.

AVERAGE RATE - ACTUAL TOTAL QUANTITY OF "MATERIAL" FOR THE PRECEDING TWELVE MONTH PERIOD, DIVIDED BY THE AVERAGE OPERATING TIME.

AVERAGE OPERATION - OPERATION TYPICAL OF THE PRECEDING TWELVE MONTH PERIOD, AS REPRESENTED BY AVERAGE OPERATING TIME AND AVERAGE RATES.

MAXIMUM - THE GREATEST VALUE ATTAINABLE OR ATTAINED FROM THE EMISSION SOURCE, OR THE PERIOD OF GREATEST OR UTMOST PRODUCTION OF THE EMISSION SOURCE. SPECIFICALLY:

MAXIMUM OPERATING TIME - GREATEST EXPECTED TOTAL HOURS OF OPERATIONS FOR ANY TWELVE MONTH PERIOD.

MAXIMUM RATE - GREATEST QUANTITY OF "MATERIAL" EXPECTED PER ANY ONE HOUR OF OPERATION.

MAXIMUM OPERATION - GREATEST EXPECTED OPERATION, AS REPRESENTED BY MAXIMUM OPERATING TIME AND MAXIMUM RATES.

RAW MATERIAL INFORMATION		
NAME OF RAW MATERIAL	AVERAGE RATE PER IDENTICAL SOURCE	MAXIMUM RATE PER IDENTICAL SOURCE
20a. Aluminum Tube (Line 1S)	b. 54.3 LB/HR	c. 57.6 LB/HR
21a. Aluminum Tube (Line 2S)	b. 60.8 LB/HR	c. 63.4 LB/HR
22a. Hanna XR 3784 (Line 2S)	b. 25.4 LB/HR	c. 40.3 LB/HR
23a. Sherwin Williams WC 18 (Line 1S)	b. 23.9 LB/HR	c. 40.8 LB/HR
24a. Watson Standard 10-084A (Line 1S)	b. 11.9 LB/HR	c. 19.6 LB/HR

PRODUCT INFORMATION		
NAME OF PRODUCT	AVERAGE RATE PER IDENTICAL SOURCE	MAXIMUM RATE PER IDENTICAL SOURCE
30a. Decorated Aluminum Tube (Line 1S)	b. 57.8 LB/HR	c. 58.9 LB/HR
31a. Decorated Aluminum Tube (Line 2S)	b. 62.9 LB/HR	c. 65.3 LB/HR
32a.	b. LB/HR	c. LB/HR
33a.	b. LB/HR	c. LB/HR
34a.	b. LB/HR	c. LB/HR

WASTE MATERIAL INFORMATION		
NAME OF WASTE MATERIAL	AVERAGE RATE PER IDENTICAL SOURCE	MAXIMUM RATE PER IDENTICAL SOURCE
40a. Coater Wash Solution (Line 1S)	b. 0.48 LB/HR	c. 0.95 LB/HR
41a. Coater Wash Solution (Line 2S)	b. 0.48 LB/HR	c. 0.95 LB/HR
42a.	b. LB/HR	c. LB/HR
43a.	b. LB/HR	c. LB/HR
44a.	b. LB/HR	c. LB/HR

*FUEL USAGE INFORMATION		
FUEL USED	TYPE	HEAT CONTENT
50a. NATURAL GAS ☒	b. ———	c. 1000 BTU/SCF
OTHER GAS ☐		BTU/SCF
OIL ☐		BTU/GAL
COAL ☐		BTU/LB
OTHER ☐		BTU/LB
d. AVERAGE FIRING RATE PER IDENTICAL SOURCE: 425,000 BTU/HR	e. MAXIMUM FIRING RATE PER IDENTICAL SOURCE: 500,000 BTU/HR	

*THIS SECTION IS TO BE COMPLETED FOR ANY FUEL USED DIRECTLY IN THE PROCESS EMISSION SOURCE, E.G. GAS IN A DRYER, OR COAL IN A MELT FURNACE.

*EMISSION INFORMATION			
51. NUMBER OF IDENTICAL SOURCES (DESCRIBE AS REQUIRED): Line 1S and Line 2S			
AVERAGE OPERATION			
CONTAMINANT	CONCENTRATION OR EMISSION RATE PER IDENTICAL SOURCE		METHOD USED TO DETERMINE CONCENTRATION OR EMISSION RATE
PARTICULATE MATTER	52a. GR/SCF	b. LB/HR	c.
CARBON MONOXIDE	53a. PPM (VOL)	b. LB/HR	c.
NITROGEN OXIDES	54a. PPM (VOL)	b. LB/HR	c.
ORGANIC MATERIAL	55a. PPM (VOL)	b. 11.3 LB/HR	c. Mass Balance Equation
SULFUR DIOXIDE	56a. PPM (VOL)	b. LB/HR	c.
**OTHER (SPECIFY)	57a. PPM (VOL)	b. LB/HR	c.
MAXIMUM OPERATION			
CONTAMINANT	CONCENTRATION OR EMISSION RATE PER IDENTICAL SOURCE		METHOD USED TO DETERMINE CONCENTRATION OR EMISSION RATE
PARTICULATE MATTER	58a. GR/SCF	b. LB/HR	c.
CARBON MONOXIDE	59a. PPM (VOL)	b. LB/HR	c.
NITROGEN OXIDES	60a. PPM (VOL)	b. LB/HR	c.
ORGANIC MATERIAL	61a. PPM (VOL)	b. 20.5 LB/HR	c. Mass Balance Equation
SULFUR DIOXIDE	62a. PPM (VOL)	b. LB/HR	c.
**OTHER (SPECIFY)	63a. PPM (VOL)	b. LB/HR	c.

*ITEMS 52 THROUGH 63 NEED NOT BE COMPLETED IF EMISSIONS ARE EXHAUSTED THROUGH AIR POLLUTION CONTROL EQUIPMENT.
**"OTHER" CONTAMINANT SHOULD BE USED FOR AN AIR CONTAMINANT NOT SPECIFICALLY NAMED ABOVE. POSSIBLE OTHER CONTAMINANTS ARE ASBESTOS, BERYLLIUM, MERCURY, VINYL CHLORIDE, LEAD, ETC.

***EXHAUST POINT INFORMATION *	
64. FLOW DIAGRAM DESIGNATION(S) OF EXHAUST POINT: "A" and "BB"	
65. DESCRIPTION OF EXHAUST POINT (LOCATION IN RELATION TO BUILDINGS, DIRECTION, HOODING, ETC.): On south penthouse roof, southwest end of property, hooded exhaust	
66. EXIT HEIGHT ABOVE GRADE: 25-1/2 ft.	67. EXIT DIAMETER: 15 inches ("A")/6 inches ("BB")
68. GREATEST HEIGHT OF NEARBY BUILDINGS: 20 FT	69. EXIT DISTANCE FROM NEAREST PLANT BOUNDARY: 110 FT
AVERAGE OPERATION	MAXIMUM OPERATION
70. EXIT GAS TEMPERATURE: 225 °F	72. EXIT GAS TEMPERATURE: 300 °F
71. GAS FLOW RATE THROUGH EACH EXIT: 1430 ("A")/300 ("BB") ACFM	73. GAS FLOW RATE THROUGH EACH EACH EXIT: 1500 ("A")/400 ("BB") ACFM

***THIS SECTION SHOULD NOT BE COMPLETED IF EMISSIONS ARE EXHAUSTED THROUGH AIR POLLUTION CONTROL EQUIPMENT.

* These exhausts both feed into the Smith thermal oxidizer

Illinois Environmental Protection Agency
Division of Air Pollution Control
2200 Churchill Road
Springfield, Illinois 62706

SURFACE COATING OPERATIONS QUESTIONNAIRE 1988

Name of Company/Plant J. L. Clark - Atlas Tube Division
Address 2300 Wisconsin Avenue, Downers Grove, Illinois 60515
I.D. No. (from mailing label) 043030AAR
Products Coated Extruded lead and aluminum tubes

Coating Category	Number of Coating Lines	Coating Category	Number of Coating Lines
Automobile & Light Duty Truck		Metal Furniture	
		Large Appliance	
Can		Magnet Wire	
Paper		Miscellaneous Metal Parts	13
Coil		Heavy Off-Highway Vehicle	
Fabric		Wood Furniture	
Vinyl		Locomotive	

THE WAYS IN WHICH COATING OPERATIONS COMPLY WITH PART 215, SUBPART F
(Check all that apply)

____ 1. No surface coating in any category above.
____ 2. Plant-wide volatile organic material emissions do not exceed 25 tons per yea
____ 3. Variance.
____ 4. Only compliant coatings used on one or more line(s).
X 5. Control equipment used on one or more line(s).
Type(s) of equipment: Thermal Oxidizer
____ 6. "Aggregation of Emission Sources," (internal offsets) Section 215.207.
X 7. Other. (Describe) See attached

If you are demonstrating compliance with Aggregation of Emission Sources, Section 215.207, please complete this questionnaire as well as the other two attached forms: Information Request - Section 215.207, and Table 1.

If you are not demonstrating compliance with Aggregation of Emission Sources, Section 215.207, complete this questionnaire only, including the following two questions:

Has this plant ever relied on "Aggregation of Emission Sources" (internal offsets) Section 215.207 to show compliance?
Yes____ No X

In the future does this plant expect to rely on "Aggregation of Emission Sources" (internal offsets) Section 215.207 to show compliance.
Yes X No____
If yes, explain: See attached

Return to Berkley Moore
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62702
217/785-1879

Person to contact for further information
Name: James Klotz
Signature:_____ Date:____
Telephone: (815) 961-5686

Attachment:

7. The Atlas Tube Division was issued operating permit 73030535, revising older permits, on September 12, 1988. A condition of this permit includes a provision to utilize Section 215.207 to demonstrate compliance. As part of the permit application, J. L. Clark - Atlas Tube Division demonstrated compliance without the use of 215.207. We have requested through Mr. Terry Sweitzer, a review of this permit for removal of this condition. With resolution of this issue, we do not anticipate the use of Section 215.207 to demonstrate compliance.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

P.O. BOX 19506, SPRINGFIELD, ILLINOIS 62794-9506

THOMAS V. SKINNER, DIRECTOR

217/782-2113

July 27, 1999

J. L. Clark Co.
Attn: Gordon E. VerWeyst
2300 Sixth Street
P.O. Box 7000
Rockford, Illinois 61125

Application No.: 73030535
I.D. No.: 043030AAR
Operation of: Downers Grove Facility
Letter Dated: June 25, 1999

Illinois EPA hereby acknowledges the receipt of your above-referenced letter and confirms the withdrawal of your Operating Permit in accordance with your request.

If you have any questions concerning this matter, please contact Steve Becker at 217/782-2113.

Donald E. Sutton

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:SPB:jar

cc: Region 1

PRIDE

J.L. CLARK
a member of the CLARCOR consumer products group

Dave Eby -
Please File.
DN

411 East Wisconsin Avenue
Milwaukee, Wisconsin 53202-4497
414/277-5000
FAX 414/271-3552
http://www.quarles.com

Attorneys at Law in
Milwaukee and Madison, Wisconsin
West Palm Beach and Naples, Florida
Phoenix, Arizona

Quarles & Brady LLP

May 12, 1999

Mr. Gordon E. VerWeyst
Vice President & General Manager
Plastic Division
J.L. Clark (CLARCOR)
1109 - 23rd Avenue
P.O. Box 7000
Rockford, IL 61125

Re: Enforcement Matter

Dear Gordie:

Enclosed is a copy of a letter I received today from Johnna Potthoff indicating that the Illinois Pollution Control Board has accepted the Amended Complaint and Amended Stipulation. As with the prior Stipulation, all that remains is for a Notice of Settlement to be published in the newspaper and, barring any objections, the settlement should become final within the next thirty days.

If you have any questions or comments, please call.

Sincerely,

Quarles & Brady LLP

Thomas P. McElligott

TPM:pjh
Enclosure

QBMKE\4366144.1
CLARCOR-J.L. Clark
200541.30026

Illinois Attorney General's Office
100 West Randolph St., 11th Floor
Chicago, Illinois 60601
(312)814-5282
Fax: (312)814-2347

53.

COPY

fax transmittal

to:	Thomas P. McElligott
fax:	414-271-3552
from:	Johnna J. Potthoff
date:	May 12, 1999
re:	J. L. Clark - PCB 99-73
pages:	2 pages plus header

NOTES: IF YOU DO NOT RECEIVE ANY OF THE PAGES PROPERLY, PLEASE CONTACT SENDER/CALL BACK PERSON AS SOON AS POSSIBLE.

THIS IS A FAX TRANSMISSION OF ATTORNEY PRIVILEGED AND/OR CONFIDENTIAL INFORMATION. IT IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE NOTIFY THE SENDER AT THE ABOVE TELEPHONE NUMBER AND DESTROY THIS TRANSMITTAL. IF YOU ARE NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY RETENTION OR DISSEMINATION OF THIS INFORMATION IS STRICTLY PROHIBITED. THANK YOU.

COPY

OFFICE OF THE ATTORNEY GENERAL
STATE OF ILLINOIS

May 12, 1999

Jim Ryan
ATTORNEY GENERAL

via facsimile and first class mail
Thomas P. McElligott, Esq.
Quarles & Brady
411 East Wisconsin Avenue
Milwaukee, Wisconsin 53202-4497

Re: People v. J. L. Clark, Inc., PCB 99-73

Dear Mr. McElligott:

Enclosed is the Illinois Pollution Control Board's Order accepting our motion for leave to file instanter the above referenced Amended Complaint and Amended Stipulation and Proposal for Settlement.

Sincerely,

Johnna J. Potthoff
Assistant Attorney General
Environmental Bureau
100 West Randolph Street - 11th Flr.
Chicago, IL 60601
(312)814-5282

encl.
c.f.: Mr. Dennis Brown w/ encl. (Illinois EPA)

500 South Second Street, Springfield, Illinois 62706 (217) 782-1090 · TTY: (217) 785-2771 · FAX: (217) 782-7046
100 West Randolph Street, Chicago, Illinois 60601 (312) 814-3000 · TTY: (312) 814-3374 · FAX: (312) 814-3806
1001 East Main, Carbondale, Illinois 62901 (618) 529-6400 · TTY: (618) 529-6403 · FAX: (618) 529-6416

MAY 12 '99 11:50

ILLINOIS POLLUTION CONTROL BOARD
May 6, 1999

COPY

PEOPLE OF THE STATE OF ILLINOIS,	)	
	)	
Complainant,	)	
	)	
v.	)	PCB 99-73
	)	(Enforcement - Air)
J.L. CLARK, INC., a Delaware corporation,	)	
	)	
Respondent.	)	

ORDER OF THE BOARD (by C.A. Manning):

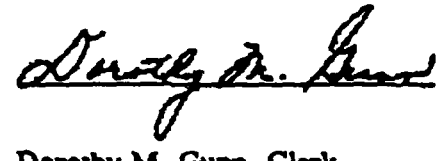
On April 23, 1999, the Illinois Attorney General and J.L. Clark, Inc., a Delaware corporation, filed an amended complaint, an amended stipulation and proposal for settlement, an agreed motion for leave to file *instanter*, and a motion requesting relief from the hearing requirement pursuant to Section 31(c)(2) of the Environmental Protection Act (Act) (415 ILCS 5/31(c)(2) (1996)). The Board considers the parties' filing of the motion for leave to file *instanter* as a request to reopen this docket. The Board grants the motion for leave to file *instanter* the amended complaint and amended stipulation.

In accordance with the requirements set forth in Section 31 (c)(2) of the Act, the Board directs the Clerk of the Board to cause publication of the required newspaper notice for the amended stipulation and proposal for settlement and request for relief from hearing concerning the amended complaint filed by the Illinois Attorney General on behalf of the People of the State of Illinois and the Illinois Environmental Protection Agency.

Any person may file a written demand for hearing within 21 days after receiving the notice. If a hearing is requested, the Board will accordingly deny the parties' request for relief and schedule a hearing.

IT IS SO ORDERED.

I, Dorothy M. Gunn, Clerk of the Illinois Pollution Control Board, hereby certify that the above order was adopted on the 6th day of May 1999 by a vote of 6-0.



Dorothy M. Gunn, Clerk
Illinois Pollution Control Board

ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62706

ANNUAL EMISSION REPORT	FOR AGENCY USE ONLY

1a. NAME OF OWNER: J. L. Clark Mfg. Company		2a. NAME OF CORPORATE DIVISION OR PLANT (IF DIFFERENT FROM OWNER): Atlas Tube Division	
1b. TELEPHONE NUMBER: 815-962-8861		2b. STREET ADDRESS OF EMISSION SOURCE: 2300 Wisconsin Avenue	
1c. STREET ADDRESS OF OWNER: 2300 Sixth Street		2c. CITY OF EMISSION SOURCE: Downers Grove	2d. TELEPHONE NUMBER: 312-969-6100
1d. CITY: Rockford		2e. COUNTY: Du Page	2f. LOCATED WITHIN CITY LIMITS: [X] YES [ ] NO
1e. STATE: Illinois	1f. ZIP CODE: 61101	2g. TOWNSHIP: Lisle	2h. ZIP CODE: 60515

PERMIT INFORMATION AND REFERENCE

LICATION NUMBER	IDENTIFICATION NUMBER	IS THE DATA AND INFORMATION PREVIOUSLY SUBMITTED TRUE, CORRECT, CURRENT AND COMPLETE?	DURING THIS REPORTING PERIOD MAXIMUM EMISSIONS FROM THIS OPERATION HAVE: INCREASED	REMAINED THE SAME	DECREASED	PERCENTAGE BY WHICH EMISSIONS HAVE INCREASED OR DECREASED
0 3 0 3 0 5 3 5	0 4 3 0 3 0 ARR	[X] YES [ ] NO		X		%
		[ ] YES [ ] NO				%
		[ ] YES [ ] NO				%
		[ ] YES [ ] NO				%

Exempt from RACT II (Rule 205 (n) (3) (A)) Less than 25/T year

4. PERIOD COVERED BY THIS REPORT: FROM May 28, 1982 TO May 27, 1983

5. THE ABOVE INFORMATION IS SUBMITTED IN ACCORDANCE WITH PCB REGS., CHAPTER 2, RULE 107(b) AS ADOPTED APRIL 14, 1972, AND THE INFORMATION IS TRUE, CORRECT, COMPLETE, AND CURRENT. THE SIGNATURE MUST BE THAT OF THE PERSON AUTHORIZED TO EXECUTE AN OPERATING PERMIT APPLICATION.

AUTHORIZED SIGNATURE William O. Nelson

A COPY OF THIS FORM MUST BE SUBMITTED FOR EACH PERMIT APPLICATION LISTED ABOVE.

THIS DOCUMENT IS NOT A PERMIT APPLICATION AND IS SOLELY FOR STATISTICAL AND INFORMATIONAL PURPOSES.

IF THE INFORMATION CONTAINED IN A LISTED PERMIT APPLICATION IS NO LONGER CORRECT, MATERIAL CORRECTING THE APPLICATION SHOULD BE SENT TO THE PERMIT SECTION OF THE DIVISION OF AIR POLLUTION CONTROL. IF THE CORRECTION IS DUE TO A MODIFICATION (INCREASE IN EMISSIONS) OR NEW EQUIPMENT, THIS MATERIAL SHOULD BE SUBMITTED AS A CONSTRUCTION PERMIT APPLICATION. OTHERWISE A LETTER EXPLAINING THE CORRECTION WILL BE SUFFICIENT.

Appendix N

TO: T.P.H. BY: R. A. Anderson

COPIES TO: J.F.N.

MCL - APL - DJS - EKP - DRG - RGL

LOB - ELG -

REFERENCE: Federal EPA Inspection - INFORMATION TPH

SUBJECT: Hazardous Waste

MAR 19 8 25 ROC

F-182

COPY PEC WCH LPC RGW

Attached is a report from D.E.D. on a Federal EPA Inspection of Hazardous Waste. When we receive the check list report from the EPA, a copy will be sent to you.

While we were not in serious violation, the inspection covered several areas that we did not realize were included in the law. The inspector was from Illinois EPA; however, the inspection was for federal standards. Some of the items included:

OK - 1. Easy access to all containers in storage.

OK - 2. Inspection reports on file of all tests on emergency equipment such as sprinkler system, heat detectors, etc.

Need - 3. Emergency or contingency plans.

Need - 4. Notification of above plans to police department, fire department, hospitals, and state and local emergency response teams.

Need - 5. Special hazardous waste training to people handling hazardous waste and documentation of training in the employees personnel file. This is not shipping procedures, but it is procedures for handling emergencies. This item is due May 19, 1981.

6. If the plant is a storage facility, which we are not, there must be a closure and a post-closure plan on file. This covers what will be done with hazardous waste materials if the plant is closed. There are other items for storage facilities which we did not cover.

R.A.A.

RAA:mp

March 16, 1981

TO: R.A.A. BY: D.E.D.

COPIES TO:

MAR 19 8 25 AM '81

REFERENCE: U S E.P.A. Inspection

SUBJECT: Hazardous Waste Compliance

F-102

On March 6, 1981, we were visited by Lisa Binder, an Environmental Protection Specialist with the Division of Land and Noise Pollution Control of the Illinois E.P.A. Working under a contract with the Federal E.P.A. Ms. Binder is to inspect sites of companies that were reported as generators of hazardous waste or completed part A form for interim status as a treatment, storage, or disposal facility.

When she arrived she was under the impression that we were a storage facility as well as a generator. I explained to her that we filed a part A application in error and subsequently notified E.P.A. region 5 that we are not a treatment,storage or disposal facility. She continued with her interview and inspection on the basis of our being only a generator.

With the use of an E.P.A. check off form she asked many questions pertaining to handling, temporary storage, and transporation of hazardous waste. She also asked to view shipping papers and records of past hazardous waste shipments.

During Ms. Binder's inspection she stated that we are in violation of Federal Register May 19, 1980 sub part G, closure and post closure. This was corrected in a phone conversation to her on March 12, 1981 when I pointed out to her that this was only for treatment, storage or disposal facility. She is correcting her report.

One area that we are not in compliance with at the present time is sub part D 265.53 b. which states: a copy of our contingency plan, or emergency plan be submitted to all local police departments, fire departments, hospitals, and state and local emergency response teams that may be called upon to provide emergency services. This section pertains to all hazardous waste generators according to Ms. Binder (phone conversation on March 12, 1981).

Also, we do not have on hand reports of inspections performed by ADT on all security systems. These should be available, in house, upon request of an E.P.A. inspector.

You asked her if Factory Mutual inspection records were sufficient. She said she thought not but would check. As of this date we have not received an answer to this question.

As of May 19, 1981 we must provide training to all employees involved in direct handling of hazardous waste and keep a statement to that effect in their personnel file.

A complete report from the Federal E.P.A., along with the check list and comments from Lisa Binder will be sent to us in four to six weeks.

Appendix O

TRI FACILITY ID: 60515JLCLR2300W

J. L. CLARK TUBE DIV.
2300 WISCONSIN AVE.
DOWNERS GROVE, IL 60515

Dear Toxic Release Inventory (EPA Form R) Reporter:

Attached is a report, produced by EPA, which lists the chemical identities and corresponding release values for the Form R's EPA received from the facility listed above for Toxic Release Inventory (TRI) Reporting Year 1991 (RY91).

It is EPA's intention to represent all data reported by your facility as accurately as possible. In order to do this, EPA has implemented a variety of quality control procedures. We believe our data entry is of good quality. However, as a final quality control measure, we ask that you verify the critical release value information listed on this report against your Form R files. If you find any data entry errors, please let us know by following these simple instructions:

- On the attached report, use a red pen to mark through the erroneous value, and write the corrected value next to it.

- Return the corrected report to:

  The EPCRA Reporting Center
  P.O. BOX 3348
  Merrifield, VA 22116-3348
  Attn: TRI 100%

We request that you do this within 21 calendar days of receipt, so that we may correct your data before we make it publicly available in the next data release. If you do not find any errors in this report, no response is necessary.

Please DO NOT use this report to make changes to release values or any other data which you reported incorrectly. Those changes should be submitted to EPA by making a photocopy of your Form R, writing 'REVISION' in red ink in the space labeled 'For Your Optional Use Only' on page one of the form, marking through the original data and writing in the revised data in red ink. The certification signature block on the revised form must contain an original signature. Mark through the photocopied signature and re-sign the revised form. Return the revised form to the address above. The attention line on the envelope should read: 'Attn: RY91 Revision'.

Please keep these facts in mind when reviewing the accuracy and completeness of this report:

1) The report lists only those Form R's which have completed our internal data quality checks. If one or more forms submitted by your facility is not listed here, you will be receiving additional correspondence from us soon.

2) The data represented here may not reflect any voluntary revisions submitted by your facility, if those revisions were not processed by the time we produced this report.

3) We have applied certain naming conventions to the way in which your facility's name is represented. For example, we always list the main company name first, followed by the division name. In addition, we use standard abbreviations for certain words such as Corporation (Corp.) and Highway (Hwy.). Please correct this information only if the actual data is incorrect.

If you have any questions about the information on this report, please call the EPCRA Reporting Center:

703-816-4445

Let the receptionist know that you are calling about the 'TRI 100% Industry Review'. The receptionist will connect you with a person who can answer your questions.

Thank you for your efforts in helping us to make Toxic Release Inventory data as accurate as possible.

Finally, we would like to suggest that you consider using magnetic media for submitting your reports in the future. Magnetic media reporting by a facility allows us to enter your data exactly as you provide it, and eliminates any opportunity for EPA to make data entry errors. A magnetic media program available from EPA will be sent to you along with the 1992 reporting package, free of charge. In addition, there are a number of commercial software packages available for your use which contain features not found in EPA's Automated Form R software. We think that you will find that reporting on diskette is both easier and more cost effective, both for facilities and the government, and that it helps to insure higher data quality. We hope that you will try magnetic media reporting, and submit your future reports on diskette.

Steven D. Newburg-Rinn

Steven D. Newburg-Rinn, Chief
Toxic Release Inventory Information
Management Branch (TS-793)
Information Management Division
Office of Pollution Prevention
and Toxics
Office of Prevention, Pesticides
and Toxic Substances
U.S. Environmental Protection
Agency

TRI FACILITY ID: 60515-JLCLR-2300W

J. L. CLARK TUBE DIV.
2300 WISCONSIN AVE.
DOWNERS GROVE, IL 60515

R E L E A S E V A L U E R E P O R T

Document Control Nbr.	Chemical Name	CAS Number
13-91-05010807-5-IL	ALUMINUM (FUME OR DUST)	007429-90-5

5.1	Fugitive or non-point air emissions	95
5.2	Stack or point air emissions	NA
5.3.A	Discharges to water bodies NA	no value
5.4	Underground injections on-site	NA
5.5.1	Releases to landfill	NA
5.5.2	Releases to land treatment/application farming	NA
5.5.3	Releases to surface impoundment	NA
5.5.4	Releases to other land disposal	NA
6.1.A	Total quantity transferred to POTWs	NA
8.1.A	Quantity released	73
8.1.B	Quantity released	95
8.1.C	quantity released	100
8.1.D	Quantity released	100
8.2.A	Quantity used for energy recovery on-site	NA
8.2.B	Quantity used for energy recovery on-site	NA
8.2.C	Quantity used for energy recovery on-site	0
8.2.D	Quantity used for energy recovery on-site	0
8.3.A	Quantity used for energy recovery off-site	NA
8.3.B	Quantity used for energy recovery off-site	NA
8.3.C	Quantity used for energy recovery off-site	0
8.3.D	Quantity used for energy recovery off-site	0
8.4.A	Quantity recycled on-site	NA
8.4.B	Quantity recycled on-site	NA
8.4.C	Quantity recycled on-site	0
8.4.D	Quantity recycled on-site	0
8.5.A	Quantity recycled off-site	NA
8.5.B	Quantity recycled off-site	NA
8.5.C	Quantity recycled off-site	0
8.5.D	Quantity recycled off-site	0
8.6.A	Quantity treated on-site	NA
8.6.B	Quantity treated on-site	NA
8.6.C	Quantity treated on-site	0
8.6.D	Quantity treated on-site	0
8.7.A	Quantity treated off-site	NA
8.7.B	Quantity treated off-site	NA
8.7.C	Quantity treated off-site	0
8.7.D	Quantity treated off-site	0
8.8	Quantity released from remedial actions	0
8.9	Production ratio or activity index	1.20

J.L. CLARK
a member of the CLARCOR consumer products group

Tube Division
TRI Fac. ID: 60515JLCLR2300W

May 15, 1998

EPCRA Reporting Center
P.O. Box 3348
Merrifield, VA 22116-3342
Ref: Toxic Chemical Release Inventory
Magnetic Media Submission

Certified Mail
Z079 575 677

To Whom It May Concern:

Enclosed please find one (1) microcomputer diskette containing toxic chemical release reporting information for J. L. Clark Tube Division.

This information is submitted as required under section 313, Title III of the Superfund Amendments and Reauthorization Act of 1986 and the Pollution Prevention Act of 1990.

We are submitting a total of three (3) reports from our facility, which refer to three (3) chemicals as reported on the regular 5-page FORM R, as follows:

Chemical Name	Report Year	CAS Number
Methyl Ethyl Ketone	1997	000078933
Toluene	1997	000108883
Aluminum (Fume or Dust)	1997	007429905

Our technical point of contact is Glenn S Ceckowski, phone number 815-961-5616, and is available should any questions or problems arise in your processing of the diskette.

I hereby certify that I have reviewed the attached diskette and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data available to the preparers of this report.

Sincerely

Gordon E. VerWeyst

Gordon VerWeyst
V. P. Operations and General Manager

2300 Sixth Street, P.O. Box 7000
Rockford, Illinois 61125
815/962-8861
FAX: 815/962-6356

J.L.CLARK
a member of the CLARCOR consumer products group

Tube Division
TRI Fac. ID: 60515JLCLR2300W

May 15, 1998

Mr. Joe Goodner
Illinois EPA Office of Chemical Safety
P.O. Box 19276
2200 Churchill Road
Springfield, IL 62794-9276
Ref: Toxic Chemical Release Inventory

Certified Mail
Z079 575 679

To Whom It May Concern:

Enclosed please find the report containing toxic chemical release reporting information for J. L. Clark Tube Division.

This information is submitted as required under section 313, Title III of the Superfund Amendments and Reauthorization Act of 1986 and the Pollution Prevention Act of 1990.

We are submitting a total of three (3) reports from our facility, which refer to three (3) chemicals as reported on the regular 5-page FORM R, as follows:

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Toluene	1997	000108883
Aluminum (Fume or Dust)	1997	007429905

Our technical point of contact is Glenn S Ceckowski, phone number 815-961-5616, and is available should any questions or problems arise in your processing of these diskette(s).

I hereby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data available to the preparers of this report.

Sincerely

Gordon E. VerWeyst

Gordon VerWeyst
V. P. Operations and General Manager

2300 Sixth Street, P.O. Box 7000
Rockford, Illinois 61125
815/962-8861
FAX: 815/962-6356

Form Approved OMB Number: 2070-0093
Approval Expires: 04/2000

(IMPORTANT: Type or print; read instructions before completing form)

EPA United States Environmental Protection Agency

FORM R

TOXIC CHEMICAL RELEASE INVENTORY REPORTING FORM

Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986, also known as Title III of the Superfund Amendments and Reauthorization Act

WHERE TO SEND COMPLETED FORMS:
1. EPCRA Reporting Center, P.O. Box 3348, Merrifield, VA 22116-3348, ATTN: TOXIC CHEMICAL RELEASE INVENTORY
2. APPROPRIATE STATE OFFICE (See instructions in Appendix F)

Enter "X" here if this is a revision

For EPA use only

IMPORTANT: See instructions to determine when "Not Applicable (NA)" boxes should be checked.

PART I. FACILITY IDENTIFICATION INFORMATION

SECTION 1. REPORTING YEAR 1997

SECTION 2. TRADE SECRET INFORMATION

2.1 Are you claiming the toxic chemical identified on page 2 trade secret? [ ] Yes (Answer question 2.2 Attach substantiation forms) [X] No (Do not answer 2.2 Go to Section 3)

2.2 Is this copy: [ ] Sanitized [ ] Unsanitized (Answer only if "YES" in 2.1)

SECTION 3. CERTIFICATION (Important: Read and sign after completing all form sections.)

I hearby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data available to the preparers of this report.

Name and official title of owner/operator or senior management official:	Signature:	Date Signed:
GORDON VERWEYST, VICE PRESIDENT	Gordon E. Verweyst	05/12/98

SECTION 4. FACILITY IDENTIFICATION

TRI Facility ID Number: 60515JLCLR2300W

	Facility or Establishment Name	Facility or Establishment Name or Mailing Address
4.1	J. L. CLARK, INC.	J. L. CLARK, INC.
Street:	2300 WISCONSIN AVENUE	Mailing Address: 2300 SIXTH ST.
City/County/State/Zip Code:	DOWNERS GROVE DUPAGE, IL 60515-	City/County/State/Zip Code: ROCKFORD, IL 61104

4.2 This report contains information for: (Important: check a or b; c if applicable) a. [X] An entire facility b. [ ] Part of a facility c. [ ] Federal Facility

4.3 Technical Contact Name: GLENN S. CECKOWSKI Telephone Number: (815) 961-5616

4.4 Public Contact Name: DAVID J. LINDSAY Telephone Number: (815) 962-8867

4.5 SIC Code(s) (4-digit)	a. 3499	b. NA	c.	d.	e.	f.

4.6	Degrees	Minutes	Seconds		Degrees	Minutes	Seconds
Latitude	041	47	28	Longitude	088	02	27

4.7 Dun & Bradstreet Number(s) (9 digits)	4.8 EPA Identification Number(s) (RCRA I.D. No.) (12 characters)	4.9 Facility NPDES Permit Number(s) (9 characters)	4.10 Underground Injection Well Code (UIC) I.D. Number(s) (12 digits)
a. 005130000	a. ILD005130000	a. NA	a. NA
b. NA	b. NA	b.	b.

SECTION 5. PARENT COMPANY INFORMATION

5.1 Name of Parent Company [ ] NA CLARCOR, INC.

5.2 Parent Company's Dun & Bradstreet Number [ ] NA (9 Digits) 005162417

EPA	EPA FORM R	TRI FACILITY ID NUMBER
United States Environmental Protection Agency	PART II. CHEMICAL-SPECIFIC INFORMATION	60515JLCLR2300W
		Chem., Cat., or Gen. Name
		ALUMINUM (FUME OR DUST)

SECTION 1. TOXIC CHEMICAL IDENTITY (Important: DO NOT complete this section if you complete Section 2 below.)

1.1 CAS Number (Important: Enter only one number exactly as it appears on the Section 313 list. Enter category code if reporting a chemical category.)

007429-90-5

1.2 Toxic Chemical or Chemical Category Name (Important: Enter only one name exactly as it appears on the Section 313 list.)

ALUMINUM (FUME OR DUST)

1.3 Generic Chemical Name (Important: Complete only if Part I, Section 2.1 is checked "yes". Generic name must be structurally descriptive.)

NA

SECTION 2. MIXTURE COMPONENT IDENTITY (Important: DO NOT complete this section if you complete Section 1 above.)

2.1 Generic Chemical Name Provided by Supplier (Important: Max. of 70 chars., including numbers, letters, spaces, and punct.)

NA

SECTION 3. ACTIVITIES AND USES OF THE CHEMICAL AT THE FACILITY (Important: Check all that apply.)

3.1 Manufacture the toxic chemical:	3.2 Process the toxic chemical:	3.3 Otherwise use the toxic chemical:
a. [ ] Produce b. [ ] Import If produce or import: c. [ ] For on-site use/processing d. [ ] For sale/distribution e. [ ] As a byproduct f. [ ] As an impurity	a. [ ] As a reactant b. [ ] As a formulation component c. [X] As an article component d. [ ] Repackaging	a. [ ] As a chemical processing aid b. [ ] As a manufacturing aid c. [ ] Ancillary or other use

SECTION 4. MAXIMUM AMOUNT OF THE TOXIC CHEMICAL ON-SITE AT ANY TIME DURING THE CALENDAR YEAR

4.1 05 (Enter two-digit code from instruction package.)

SECTION 5. QUANTITY OF TOXIC CHEMICAL ENTERING EACH ENVIRONMENTAL MEDIUM

			A. Total Release (pounds/year) (enter range code from instructions or estimate)	B. Basis of Estimate (enter code)	C. % From Stormwater
5.1	Fugitive or non-point air emissions	NA[ ]	63	0	
5.2	Stack or point air emissions	NA[X]	NA		
5.3	Discharges to receiving streams or water bodies (enter one name per box)				
	Stream or Water Body Name				
5.3.1	NA				
5.3.2					
5.3.3					
5.4.1	Underground injections on-site to Class I Wells:	NA[X]	NA		
5.4.2	Underground injections on-site to Class II-V Wells:	NA[X]	NA		

If additional pages of Part II, Section 5.3 are attached, indicate the total number of pages in this box [ ] and indicate which Part II, Section 5.3 page this is, here. [1] (example: 1,2,3,etc.)

EPA	EPA FORM R	TRI FACILITY ID NUMBER
United States Environmental Protection Agency	PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)	60515JLCLR2300W
		Chem., Cat., or Gen. Name
		ALUMINUM (FUME OR DUST)

SECTION 5. QUANTITY OF THE TOXIC CHEMICAL ENTERING EACH ENVIRONMENTAL MEDIUM

		NA	A. Total Release (pounds/year) (enter range code from instructions or estimate)	B. Basis of Estimate (enter code)
5.5	Disposal to land on-site			
5.5.1A	RCRA Subtitle C landfills	[X]	NA	
5.5.1B	Other landfills	[X]	NA	
5.5.2	Land treatment/ application farming	[X]	NA	
5.5.3	Surface impoundment	[X]	NA	
5.5.4	Other disposal	[X]	NA	

SECTION 6. TRANSFERS OF THE TOXIC CHEMICAL IN WASTES TO OFF-SITE LOCATIONS

6.1 DISCHARGES TO PUBLICLY OWNED TREATMENT WORKS (POTW)

6.1.A Total Quantity Transferred to POTWs and Basis of Estimate

6.1.A.1 Total Transfers (pounds/year) (enter range code or estimate)	6.1.A.2 Basis of Estimate (enter code)
NA	

6.1.B.1 POTW Name:

POTW Address:

City:	State:	County:	Zip:

6.1.B.2 POTW Name:

POTW Address:

City:	State:	County:	Zip:

If additional pages of Part II, Section 6.1 are attached, indicate the total number of pages in this box [ ] and indicate which Part II, Sections 6.1 page this is, here. [1] (example: 1,2,3,etc.)

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS

6.2.1 Off-site EPA Identification Number (RCRA ID No.)
NA

Off-Site Location Name

Off-Site Address

City:	State:	County:	Zip:

Is location under control of reporting facility or parent company? [ ] YES [ ] NO

Range Codes: A = 1 - 10 pounds
B = 11 - 499 pounds
C = 500 - 999 pounds

EPA United States Environmental Protection Agency	EPA FORM R PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)	TRI FACILITY ID NUMBER 60515JLCLR2300W Chem., Cat., or Gen. Name ALUMINUM (FUME OR DUST)

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS (continued)

A. Total Transfers (pounds/year) (enter range code or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)
1.	1.	1.
2.	2.	2.
3.	3.	3.
4.	4.	4.

6.2.2 Off-site EPA Identification Number (RCRA ID No.): NA

Off-Site Location Name

Off-Site Address

City:	State:	County:	Zip:

Is location under control of reporting facility or parent company? [ ] YES [ ] NO

A. Total Transfers (pounds/year) (enter range code or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)
1.	1.	1.
2.	2.	2.
3.	3.	3.
4.	4.	4.

SECTION 7A. ON-SITE WASTE TREATMENT METHODS AND EFFICIENCY

[X] Not Applicable (NA)-Check here if no on-site treatment is applied to any waste stream containing toxic chem. or chem. categ.

a. General Waste Stream (enter code)	b. Waste Treatment Method(s) Sequence [enter 3-character code(s)]	c. Range of Influent Concentration	d. Treatment Efficiency Estimate	e. Based on Operating Data?
7A.1a	7A.1b 1 2 3 4 5 6 7 8	7A.1c	7A.1d	7A.1e
NA			%	Yes [ ] No [ ]
7A.2a	7A.2b 1 2 3 4 5 6 7 8	7A.2c	7A.2d	7A.2e
			%	Yes [ ] No [ ]
7A.3a	7A.3b 1 2 3 4 5 6 7 8	7A.3c	7A.3d	7A.3e
			%	Yes [ ] No [ ]
7A.4a	7A.4b 1 2 3 4 5 6 7 8	7A.4c	7A.4d	7A.4e
			%	Yes [ ] No [ ]
7A.5a	7A.5b 1 2 3 4 5 6 7 8	7A.5c	7A.5d	7A.5e
			%	Yes [ ] No [ ]

If additional pages of Part II, Sections 6.2/7A. are attached, indicate the total number of pages in this box [ ] and indicate which page (of Part II, Sections 6.2/7A.) is provided here: [,1] (example: 1,2,3,etc.)

EPA United States Environmental Protection Agency	EPA FORM R PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)	TRI FACILITY ID NUMBER: 60515JLCLR2300W Chem., Cat., or Gen. Name: ALUMINUM (FUME OR DUST)

SECTION 7B. ON-SITE ENERGY RECOVERY PROCESSES

[X] Not Applicable (NA) - Check here if no on-site energy recovery is applied to any waste stream containing the toxic chemical or chemical category.

Energy Recovery Methods [enter 3-character code(s)]:	1	NA	2		3		4	

SECTION 7C. ON-SITE RECYCLING PROCESSES

[X] Not Applicable (NA) - Check here if no on-site recycling is applied to any waste stream containing the toxic chemical or chemical category.

Recycling Methods [enter 3-character code(s)]:	1	NA	2		3		4		5	
	6		7		8		9		10	

SECTION 8. SOURCE REDUCTION AND RECYCLING ACTIVITIES

	All estimates can be reported using up to two significant figures.	Column A 1996 (pounds/year)	Column B 1997 (pounds/year)	Column C 1998 (pounds/year)	Column D 1999 (pounds/year)
8.1	Quantity released *	77	63	0	0
8.2	Quantity used for energy recovery on-site	0	0	0	0
8.3	Quantity used for energy recovery off-site	0	0	0	0
8.4	Quantity recycled on-site	0	0	0	0
8.5	Quantity recycled off-site	0	0	0	0
8.6	Quantity treated on-site	0	0	0	0
8.7	Quantity treated off-site	0	0	0	0
8.8	Quantity released to the environment as a result of remedial actions, catastrophic events, or one-time events not associated with production processes (pounds/year)				0
8.9	Production Ratio or Activity Index				0000.82

8.10 Did your facility engage in any source reduction activities for this chemical during the reporting year? If not, enter "NA" In Section 8.10.1 and answer Section 8.11.

	Source Reduction Activities [enter code(s)]	Methods to Identify Activity (enter codes)		
8.10.1	NA	a.	b.	c.
8.10.2		a.	b.	c.
8.10.3		a.	b.	c.
8.10.4		a.	b.	c.

8.11 Is additional optional information on source reduction, recycling, or pollution control activities included with this report? (Check one box) YES [ ] NO [X]

* Report releases pursuant to EPRCA Section 329(8) including "any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment". Do not include any quantity treated on-site or off-site.

(IMPORTANT: Type or print; read instructions before completing form)

Form Approved OMB Number: 2070-0093
Approval Expires: 04/2000

EPA United States Environmental Protection Agency	FORM R Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986, also known as Title III of the Superfund Amendments and Reauthorization Act	TOXIC CHEMICAL RELEASE INVENTORY REPORTING FORM

WHERE TO SEND COMPLETED FORMS:	1. EPCRA Reporting Center P.O. Box 3348 Merrifield, VA 22116-3348 ATTN: TOXIC CHEMICAL RELEASE INVENTORY	2. APPROPRIATE STATE OFFICE (See instructions in Appendix F)	Enter "X" here if this is a revision For EPA use only

IMPORTANT: See instructions to determine when "Not Applicable (NA)" boxes should be checked.

PART I. FACILITY IDENTIFICATION INFORMATION

SECTION 1. REPORTING YEAR 1997

SECTION 2. TRADE SECRET INFORMATION

2.1	Are you claiming the toxic chemical identified on page 2 trade secret? [ ] Yes (Answer question 2.2 Attach substantiation forms) [X] No (Do not answer 2.2 Go to Section 3)	2.2	Is this copy: [ ] Sanitized [ ] Unsanitized (Answer only if "YES" in 2.1)

SECTION 3. CERTIFICATION (Important: Read and sign after completing all form sections.)

I hearby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data available to the preparers of this report.

Name and official title of owner/operator or senior management official:	Signature:	Date Signed:
GORDON VERWEYST, VICE PRESIDENT	Gordon E. Verweyst	05/12/98

SECTION 4. FACILITY IDENTIFICATION

TRI Facility ID Number: 60515JLCLR2300W

	Facility or Establishment Name	Facility or Establishment Name or Mailing Address
4.1	J. L. CLARK, INC.	J. L. CLARK, INC.
	Street: 2300 WISCONSIN AVENUE	Mailing Address: 2300 SIXTH ST.
	City/County/State/Zip Code: DOWNERS GROVE DUPAGE, IL 60515-	City/County/State/Zip Code: ROCKFORD, IL 61104

4.2	This report contains information for: (Important: check a or b; c if applicable)	a. [X] An entire facility	b. [ ] Part of a facility	c. [ ] Federal Facility		
4.3	Technical Contact	Name: GLENN S. CECKOWSKI		Telephone Number: (815) 961-5616		
4.4	Public Contact	Name: DAVID J. LINDSAY		Telephone Number: (815) 962-8867		
4.5	SIC Code(s) (4-digit)	a. 3499	b. NA	c.	d.	e. f.

4.6		Degrees	Minutes	Seconds		Degrees	Minutes	Seconds
	Latitude	041	47	28	Longitude	088	02	27

4.7	Dun & Bradstreet Number(s) (9 digits)	4.8	EPA Identification Number(s) (RCRA I.D. No.) (12 characters)	4.9	Facility NPDES Permit Number(s) (9 characters)	4.10	Underground Injection Well Code (UIC) I.D. Number(s) (12 digits)
	a. 005130000		a. ILD005130000		a. NA		a. NA
	b. NA		b. NA		b.		b.

SECTION 5. PARENT COMPANY INFORMATION

5.1	Name of Parent Company	[ ] NA	CLARCOR, INC.
5.2	Parent Company's Dun & Bradstreet Number	[ ] NA	(9 Digits) 005162417

EPA	EPA FORM R	TRI FACILITY ID NUMBER
United States Environmental Protection Agency	PART II. CHEMICAL-SPECIFIC INFORMATION	60515JLCLR2300W
		Chem., Cat., or Gen. Name: TOLUENE

SECTION 1. TOXIC CHEMICAL IDENTITY (Important: DO NOT complete this section if you complete Section 2 below.)

1.1 CAS Number (Important: Enter only one number exactly as it appears on the Section 313 list. Enter category code if reporting a chemical category.)
000108-88-3

1.2 Toxic Chemical or Chemical Category Name (Important: Enter only one name exactly as it appears on the Section 313 list.)
TOLUENE

1.3 Generic Chemical Name (Important: Complete only if Part I, Section 2.1 is checked "yes". Generic name must be structurally descriptive.)
NA

SECTION 2. MIXTURE COMPONENT IDENTITY (Important: DO NOT complete this section if you complete Section 1 above.)

2.1 Generic Chemical Name Provided by Supplier (Important: Max. of 70 chars., including numbers, letters, spaces, and punct.)
NA

SECTION 3. ACTIVITIES AND USES OF THE CHEMICAL AT THE FACILITY (Important: Check all that apply.)

3.1 Manufacture the toxic chemical:	3.2 Process the toxic chemical:	3.3 Otherwise use the toxic chemical:
a. [ ] Produce b. [ ] Import If produce or import: c. [ ] For on-site use/processing d. [ ] For sale/distribution e. [ ] As a byproduct f. [ ] As an impurity	a. [ ] As a reactant b. [ ] As a formulation component c. [ ] As an article component d. [ ] Repackaging	a. [X] As a chemical processing aid b. [ ] As a manufacturing aid c. [X] Ancillary or other use

SECTION 4. MAXIMUM AMOUNT OF THE TOXIC CHEMICAL ON-SITE AT ANY TIME DURING THE CALENDAR YEAR

4.1 03 (Enter two-digit code from instruction package.)

SECTION 5. QUANTITY OF TOXIC CHEMICAL ENTERING EACH ENVIRONMENTAL MEDIUM

			A. Total Release (pounds/year) (enter range code from instructions or estimate)	B. Basis of Estimate (enter code)	C. % From Stormwater
5.1	Fugitive or non-point air emissions	NA[ ]	542	O	
5.2	Stack or point air emissions	NA[ ]	3277	O	
5.3	Discharges to receiving streams or water bodies (enter one name per box)				
	Stream or Water Body Name				
5.3.1	NA				
5.3.2					
5.3.3					
5.4.1	Underground injections on-site to Class I Wells:	NA[X]	NA		
5.4.2	Underground injections on-site to Class II-V Wells:	NA[X]	NA		

If additional pages of Part II, Section 5.3 are attached, indicate the total number of pages in this box [ ] and indicate which Part II, Section 5.3 page this is, here. [1] (example: 1,2,3,etc.)

EPA	EPA FORM R	TRI FACILITY ID NUMBER
United States Environmental Protection Agency	PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)	60515JLCLR2300W
		Chem., Cat., or Gen. Name
		TOLUENE

SECTION 5. QUANTITY OF THE TOXIC CHEMICAL ENTERING EACH ENVIRONMENTAL MEDIUM

		NA	A. Total Release (pounds/year) (enter range code from instructions or estimate)	B. Basis of Estimate (enter code)
5.5	Disposal to land on-site			
5.5.1A	RCRA Subtitle C landfills	[X]	NA	
5.5.1B	Other landfills	[X]	NA	
5.5.2	Land treatment/ application farming	[X]	NA	
5.5.3	Surface impoundment	[X]	NA	
5.5.4	Other disposal	[X]	NA	

SECTION 6. TRANSFERS OF THE TOXIC CHEMICAL IN WASTES TO OFF-SITE LOCATIONS

6.1 DISCHARGES TO PUBLICLY OWNED TREATMENT WORKS (POTW)

6.1.A Total Quantity Transferred to POTWs and Basis of Estimate

6.1.A.1 Total Transfers (pounds/year) (enter range code or estimate)	6.1.A.2 Basis of Estimate (enter code)
NA	

6.1.B.1 POTW Name:

POTW Address:

City:	State:	County:	Zip:

6.1.B.2 POTW Name:

POTW Address:

City:	State:	County:	Zip:

If additional pages of Part II, Section 6.1 are attached, indicate the total number of pages in this box [ ] and indicate which Part II, Sections 6.1 page this is, here. [1] (example: 1,2,3,etc.)

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS

6.2.1 Off-site EPA Identification Number (RCRA ID No.)
WID990829475

Off-Site Location Name WASTE RESEARCH AND RECLAMATION CO., INC.

Off-Site Address 5200 STATE ROAD 93

City: EAU CLAIRE	State: WI	County: EAU CLAIRE	Zip: 54701-

Is location under control of reporting facility or parent company? [ ] YES [X] NO

Range Codes: A = 1 - 10 pounds
B = 11 - 499 pounds
C = 500 - 999 pounds

EPA United States Environmental Protection Agency	EPA FORM R PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)	TRI FACILITY ID NUMBER 60515JLCLR2300W Chem., Cat., or Gen. Name TOLUENE

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS (continued)

A. Total Transfers (pounds/year) (enter range code or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)
1. 6103	1. O	1. M20
2.	2.	2.
3.	3.	3.
4.	4.	4.

6.2.2 Off-site EPA Identification Number (RCRA ID No.): NA

Off-Site Location Name

Off-Site Address

City:	State:	County:	Zip:

Is location under control of reporting facility or parent company? [ ] YES [ ] NO

A. Total Transfers (pounds/year) (enter range code or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)
1.	1.	1.
2.	2.	2.
3.	3.	3.
4.	4.	4.

SECTION 7A. ON-SITE WASTE TREATMENT METHODS AND EFFICIENCY

[ ] Not Applicable (NA)-Check here if no on-site treatment is applied to any waste stream containing toxic chem. or chem. categ.

a. General Waste Stream (enter code)	b. Waste Treatment Method(s) Sequence [enter 3-character code(s)]	c. Range of Influent Concentration	d. Treatment Efficiency Estimate	e. Based on Operating Data?
7A.1a	7A.1b 1 F71 2 NA 3 4 5 6 7 8	7A.1c	7A.1d	7A.1e
A		4	090.00 %	Yes [ ] No [X]
7A.2a	7A.2b 1 2 3 4 5 6 7 8	7A.2c	7A.2d	7A.2e
NA			. %	Yes [ ] No [ ]
7A.3a	7A.3b 1 2 3 4 5 6 7 8	7A.3c	7A.3d	7A.3e
			%	Yes [ ] No [ ]
7A.4a	7A.4b 1 2 3 4 5 6 7 8	7A.4c	7A.4d	7A.4e
			%	Yes [ ] No [ ]
7A.5a	7A.5b 1 2 3 4 5 6 7 8	7A.5c	7A.5d	7A.5e
			%	Yes [ ] No [ ]

If additional pages of Part II, Sections 6.2/7A. are attached, indicate the total number of pages in this box [ ] and indicate which page (of Part II, Sections 6.2/7A.) is provided here: [,1] (example: 1,2,3,etc.)

EPA United States Environmental Protection Agency	EPA FORM R PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)	TRI FACILITY ID NUMBER: 60515JLCLR2300W Chem., Cat., or Gen. Name: TOLUENE

SECTION 7B. ON-SITE ENERGY RECOVERY PROCESSES

[X] Not Applicable (NA) - Check here if no on-site energy recovery is applied to any waste stream containing the toxic chemical or chemical category.

Energy Recovery Methods [enter 3-character code(s)]:	1	NA	2		3		4	

SECTION 7C. ON-SITE RECYCLING PROCESSES

[X] Not Applicable (NA) - Check here if no on-site recycling is applied to any waste stream containing the toxic chemical or chemical category.

Recycling Methods [enter 3-character code(s)]:	1	NA	2		3		4		5	
	6		7		8		9		10	

SECTION 8. SOURCE REDUCTION AND RECYCLING ACTIVITIES

	All estimates can be reported using up to two significant figures.	Column A 1996 (pounds/year)	Column B 1997 (pounds/year)	Column C 1998 (pounds/year)	Column D 1999 (pounds/year)
8.1	Quantity released *	4156	3819	0	0
8.2	Quantity used for energy recovery on-site	0	0	0	0
8.3	Quantity used for energy recovery off-site	0	0	0	0
8.4	Quantity recycled on-site	0	0	0	0
8.5	Quantity recycled off-site	6291	6103	0	0
8.6	Quantity treated on-site	0	0	0	0
8.7	Quantity treated off-site	0	0	0	0
8.8	Quantity released to the environment as a result of remedial actions, catastrophic events, or one-time events not associated with production processes (pounds/year)				0
8.9	Production Ratio or Activity Index				0000.82

8.10 Did your facility engage in any source reduction activities for this chemical during the reporting year? If not, enter "NA" In Section 8.10.1 and answer Section 8.11.

	Source Reduction Activities [enter code(s)]	Methods to Identify Activity (enter codes)		
8.10.1	NA	a.	b.	c.
8.10.2		a.	b.	c.
8.10.3		a.	b.	c.
8.10.4		a.	b.	c.

8.11 Is additional optional information on source reduction, recycling, or pollution control activities included with this report? (Check one box) YES [ ] NO [X]

* Report releases pursuant to EPRCA Section 329(8) including "any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment". Do not include any quantity treated on-site or off-site.

Form Approved OMB Number: 2070-0093
Approval Expires: 04/2000

(IMPORTANT: Type or print; read instructions before completing form)

EPA United States Environmental Protection Agency

FORM R

TOXIC CHEMICAL RELEASE INVENTORY REPORTING FORM

Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986, also known as Title III of the Superfund Amendments and Reauthorization Act

WHERE TO SEND COMPLETED FORMS:
1. EPCRA Reporting Center, P.O. Box 3348, Merrifield, VA 22116-3348, ATTN: TOXIC CHEMICAL RELEASE INVENTORY
2. APPROPRIATE STATE OFFICE (See instructions in Appendix F)

Enter "X" here if this is a revision

For EPA use only

IMPORTANT: See instructions to determine when "Not Applicable (NA)" boxes should be checked.

PART I. FACILITY IDENTIFICATION INFORMATION

SECTION 1. REPORTING YEAR 1997

SECTION 2. TRADE SECRET INFORMATION

2.1 Are you claiming the toxic chemical identified on page 2 trade secret? [ ] Yes (Answer question 2.2 Attach substantiation forms) [X] No (Do not answer 2.2 Go to Section 3)

2.2 Is this copy: [ ] Sanitized [ ] Unsanitized (Answer only if "YES" in 2.1)

SECTION 3. CERTIFICATION (Important: Read and sign after completing all form sections.)

I hearby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data available to the preparers of this report.

Name and official title of owner/operator or senior management official:	Signature:	Date Signed:
GORDON VERWEYST, VICE PRESIDENT	Gordon E. VerWeyst	05/12/98

SECTION 4. FACILITY IDENTIFICATION

TRI Facility ID Number: 60515JLCLR2300W

	Facility or Establishment Name	Facility or Establishment Name or Mailing Address
4.1	J. L. CLARK, INC.	J. L. CLARK, INC.
Street:	2300 WISCONSIN AVENUE	Mailing Address: 2300 SIXTH ST.
City/County/State/Zip Code:	DOWNERS GROVE DUPAGE, IL 60515-	City/County/State/Zip Code: ROCKFORD, IL 61104

4.2 This report contains information for: (Important: check a or b; c if applicable) a. [X] An entire facility b. [ ] Part of a facility c. [ ] Federal Facility

4.3 Technical Contact Name: GLENN S. CECKOWSKI Telephone Number: (815) 961-5616

4.4 Public Contact Name: DAVID J. LINDSAY Telephone Number: (815) 962-8867

4.5 SIC Code(s) (4-digit) a. 3499 b. NA c. d. e. f.

4.6	Degrees	Minutes	Seconds		Degrees	Minutes	Seconds
Latitude	041	47	28	Longitude	088	02	27

4.7 Dun & Bradstreet Number(s) (9 digits)	4.8 EPA Identification Number(s) (RCRA I.D. No.) (12 characters)	4.9 Facility NPDES Permit Number(s) (9 characters)	4.10 Underground Injection Well Code (UIC) I.D. Number(s) (12 digits)
a. 005130000	a. ILD005130000	a. NA	a. NA
b. NA	b. NA	b.	b.

SECTION 5. PARENT COMPANY INFORMATION

5.1 Name of Parent Company [ ] NA CLARCOR, INC.

5.2 Parent Company's Dun & Bradstreet Number [ ] NA (9 Digits) 005162417

EPA United States Environmental Protection Agency	EPA FORM R PART II. CHEMICAL-SPECIFIC INFORMATION	TRI FACILITY ID NUMBER: 60515JLCLR2300W Chem., Cat., or Gen. Name: METHYL ETHYL KETONE

SECTION 1. TOXIC CHEMICAL IDENTITY (Important: DO NOT complete this section if you complete Section 2 below.)

1.1 CAS Number (Important: Enter only one number exactly as it appears on the Section 313 list. Enter category code if reporting a chemical category.)
000078-93-3

1.2 Toxic Chemical or Chemical Category Name (Important: Enter only one name exactly as it appears on the Section 313 list.)
METHYL ETHYL KETONE

1.3 Generic Chemical Name (Important: Complete only if Part I, Section 2.1 is checked "yes". Generic name must be structurally descriptive.)
NA

SECTION 2. MIXTURE COMPONENT IDENTITY (Important: DO NOT complete this section if you complete Section 1 above.)

2.1 Generic Chemical Name Provided by Supplier (Important: Max. of 70 chars., including numbers, letters, spaces, and punct.)
NA

SECTION 3. ACTIVITIES AND USES OF THE CHEMICAL AT THE FACILITY (Important: Check all that apply.)

3.1 Manufacture the toxic chemical:	3.2 Process the toxic chemical:	3.3 Otherwise use the toxic chemical:
a. [ ] Produce b. [ ] Import If produce or import: c. [ ] For on-site use/processing d. [ ] For sale/distribution e. [ ] As a byproduct f. [ ] As an impurity	a. [ ] As a reactant b. [ ] As a formulation component c. [ ] As an article component d. [ ] Repackaging	a. [X] As a chemical processing aid b. [ ] As a manufacturing aid c. [X] Ancillary or other use

SECTION 4. MAXIMUM AMOUNT OF THE TOXIC CHEMICAL ON-SITE AT ANY TIME DURING THE CALENDAR YEAR

4.1 03 (Enter two-digit code from instruction package.)

SECTION 5. QUANTITY OF TOXIC CHEMICAL ENTERING EACH ENVIRONMENTAL MEDIUM

			A. Total Release (pounds/year) (enter range code from instructions or estimate)	B. Basis of Estimate (enter code)	C. % From Stormwater
5.1	Fugitive or non-point air emissions	NA[ ]	247	0	
5.2	Stack or point air emissions	NA[ ]	2484	0	
5.3	Discharges to receiving streams or water bodies (enter one name per box)				
	Stream or Water Body Name				
5.3.1	NA				
5.3.2					
5.3.3					
5.4.1	Underground injections on-site to Class I Wells:	NA[X]	NA		
5.4.2	Underground injections on-site to Class II-V Wells:	NA[X]	NA		

If additional pages of Part II, Section 5.3 are attached, indicate the total number of pages in this box [ ] and indicate which Part II, Section 5.3 page this is, here. [1] (example: 1,2,3,etc.)

EPA	EPA FORM R	TRI FACILITY ID NUMBER
United States Environmental Protection Agency	PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)	60515JLCLR2300W
		Chem., Cat., or Gen. Name
		METHYL ETHYL KETONE

SECTION 5. QUANTITY OF THE TOXIC CHEMICAL ENTERING EACH ENVIRONMENTAL MEDIUM

		NA	A. Total Release (pounds/year) (enter range code from instructions or estimate)	B. Basis of Estimate (enter code)
5.5	Disposal to land on-site			
5.5.1A	RCRA Subtitle C landfills	[X]	NA	
5.5.1B	Other landfills	[X]	NA	
5.5.2	Land treatment/ application farming	[X]	NA	
5.5.3	Surface impoundment	[X]	NA	
5.5.4	Other disposal	[X]	NA	

SECTION 6. TRANSFERS OF THE TOXIC CHEMICAL IN WASTES TO OFF-SITE LOCATIONS

6.1 DISCHARGES TO PUBLICLY OWNED TREATMENT WORKS (POTW)

6.1.A Total Quantity Transferred to POTWs and Basis of Estimate

6.1.A.1 Total Transfers (pounds/year) (enter range code or estimate)	6.1.A.2 Basis of Estimate (enter code)
NA	

6.1.B.1 POTW Name:

POTW Address:

City:	State:	County:	Zip:

6.1.B.2 POTW Name:

POTW Address:

City:	State:	County:	Zip:

If additional pages of Part II, Section 6.1 are attached, indicate the total number of pages in this box [ ] and indicate which Part II, Sections 6.1 page this is, here. [1] (example: 1,2,3,etc.)

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS

6.2.1 Off-site EPA Identification Number (RCRA ID No.)
WID990829475

Off-Site Location Name WASTE RESEARCH AND RECLAMATION CO., INC.

Off-Site Address 5200 STATE ROAD 93

City: EAU CLAIRE	State: WI	County: EAU CLAIRE	Zip: 54701-

Is location under control of reporting facility or parent company? [ ] YES [X] NO

Range Codes: A = 1 - 10 pounds
B = 11 - 499 pounds
C = 500 - 999 pounds

EPA United States Environmental Protection Agency	EPA FORM R PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)	TRI FACILITY ID NUMBER 60515JLCLR2300W Chem., Cat., or Gen. Name METHYL ETHYL KETONE

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS (continued)

A. Total Transfers (pounds/year) (enter range code or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)
1. 691	1. O	1. M20
2. NA	2.	2.
3.	3.	3.
4.	4.	4.

6.2.2 Off-site EPA Identification Number (RCRA ID No.): NA

Off-Site Location Name

Off-Site Address

City:	State:	County:	Zip:

Is location under control of reporting facility or parent company? [ ] YES [ ] NO

A. Total Transfers (pounds/year) (enter range code or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)
1.	1.	1.
2.	2.	2.
3.	3.	3.
4.	4.	4.

SECTION 7A. ON-SITE WASTE TREATMENT METHODS AND EFFICIENCY

[ ] Not Applicable (NA)-Check here if no on-site treatment is applied to any waste stream containing toxic chem. or chem. categ.

a. General Waste Stream (enter code)	b. Waste Treatment Method(s) Sequence [enter 3-character code(s)]	c. Range of Influent Concentration	d. Treatment Efficiency Estimate	e. Based on Operating Data?
7A.1a	7A.1b 1 F71 2 NA	7A.1c	7A.1d	7A.1e
A	3 4 5 6 7 8	3	090.00 %	Yes [ ] No [X]
7A.2a	7A.2b 1 2	7A.2c	7A.2d	7A.2e
NA	3 4 5 6 7 8		. %	Yes [ ] No [ ]
7A.3a	7A.3b 1 2	7A.3c	7A.3d	7A.3e
	3 4 5 6 7 8		%	Yes [ ] No [ ]
7A.4a	7A.4b 1 2	7A.4c	7A.4d	7A.4e
	3 4 5 6 7 8		%	Yes [ ] No [ ]
7A.5a	7A.5b 1 2	7A.5c	7A.5d	7A.5e
	3 4 5 6 7 8		%	Yes [ ] No [ ]

If additional pages of Part II, Sections 6.2/7A. are attached, indicate the total number of pages in this box [ ] and indicate which page (of Part II, Sections 6.2/7A.) is provided here: [,1] (example: 1,2,3,etc.)

EPA United States Environmental Protection Agency	EPA FORM R PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)	TRI FACILITY ID NUMBER: 60515JLCLR2300W Chem., Cat., or Gen. Name: METHYL ETHYL KETONE

SECTION 7B. ON-SITE ENERGY RECOVERY PROCESSES

[X] Not Applicable (NA) - Check here if no on-site energy recovery is applied to any waste stream containing the toxic chemical or chemical category.

Energy Recovery Methods [enter 3-character code(s)]:	1	NA	2		3		4	

SECTION 7C. ON-SITE RECYCLING PROCESSES

[X] Not Applicable (NA) - Check here if no on-site recycling is applied to any waste stream containing the toxic chemical or chemical category.

Recycling Methods [enter 3-character code(s)]:	1	NA	2		3		4		5	
	6		7		8		9		10	

SECTION 8. SOURCE REDUCTION AND RECYCLING ACTIVITIES

	All estimates can be reported using up to two significant figures.	Column A 1996 (pounds/year)	Column B 1997 (pounds/year)	Column C 1998 (pounds/year)	Column D 1999 (pounds/year)
8.1	Quantity released *	3422	2731	0	0
8.2	Quantity used for energy recovery on-site	0	0	0	0
8.3	Quantity used for energy recovery off-site	0	0	0	0
8.4	Quantity recycled on-site	0	0	0	0
8.5	Quantity recycled off-site	346	691	0	0
8.6	Quantity treated on-site	0	0	0	0
8.7	Quantity treated off-site	0	0	0	0
8.8	Quantity released to the environment as a result of remedial actions, catastrophic events, or one-time events not associated with production processes (pounds/year)				0
8.9	Production Ratio or Activity Index				0000.82

8.10 Did your facility engage in any source reduction activities for this chemical during the reporting year? If not, enter "NA" In Section 8.10.1 and answer Section 8.11.

	Source Reduction Activities [enter code(s)]	Methods to Identify Activity (enter codes)		
8.10.1	NA	a.	b.	c.
8.10.2		a.	b.	c.
8.10.3		a.	b.	c.
8.10.4		a.	b.	c.

8.11 Is additional optional information on source reduction, recycling, or pollution control activities included with this report? (Check one box) YES [ ] NO [X]

* Report releases pursuant to EPRCA Section 329(8) including "any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment". Do not include any quantity treated on-site or off-site.

J. L. Clark - Tube Division

Form R 1997, updated 5/11/98 for the Toxic Chemical Release Inventory

PRODUCT	ISSUE	WEIGHT LBS/GAL	TOTAL GAL	TOTAL LBS	%	108-10-1 MIBK	%	108-88-3 TOLUENE	%	GLYET Glycol Ether	%	1330-20-7 XYLENE	%	91-20-3 NAPTHAL	%	78-93-3 MEK	%	7429-90-5 ALUMINUM	%	MISC	NAME
374-C27-5020 H23 Lining	06-16-92	7.52	373	2,805	0.038	107	0.139	390	0.061	171	0.011	31		0	0.383	1074		0		0	
374-C27-4033 XR 3164	09-01-92	8.05	55	443		0		0		0	0.022	10		0		0		0		0	
375-W27-5029 Peel 3817	03-14-89	9.57	23	220		0		0		0		0		0		0		0		0	
222-Y27-2011 Desenex Yellow	05-16-90	11.69	40	468		0		0		0		0		0		0		0		0	
222-R27-2012 ROSE	05-05-94	11.8	51	602		0		0		0		0	0.017	10		0		0		0	
222-Y27-2008 BR. YELLOW	04-15-93	11.32	94	1,064		0		0		0		0	0.019	20		0		0		0	
375-Z27-5048 XB2666 AAL	06-21-94	8.31		0		0		0		0		0		0		0		0		0	
375-E27-0006 AL. ADD	11-14-94	8.11	24	195		0		0		0	0.013	3		0		0	0.016	3		0	
PE1090	04-10-95	7.68	110	845	0.050	42	0.100	84		0	0.050	42		0	0.350	296		0		0	
XR1215 INTERNAL LINING	07-29-88	8.07	18	145	0.010	1		0		0	0.526	76		0		0		0	0.005	1	Propylene O
660 SOLVENT	12-11-93	7.01	3,300	23,133		0	0.560	12954		0		0		0		0		0	0.440	10179	Acetone
MEK	11-15-85	6.73	713	4,798		0		0		0		0		0	1.000	4798		0		0	
MINERAL SPIRITS	04-08-86	6.49	55	357		0		0		0		0		0		0		0		0	
GLYCOL ETHER DB ACETATE	03-09-87	8.18	55	450		0		0	1.000	450		0		0		0		0		0	
GLYCOL ETHER EB ACETATE	04-08-87	7.85	110	864		0		0	1.000	864		0		0		0		0		0	
2300 VINYL REDUCER	07-00-86	7.61		0		0		0		0		0		0		0		0		0	
150 SOLVENT	04-10-86	8.22	55	452		0		0		0		0	0.090	41		0		0		0	
S5061-041 GOLD LINING	09-22-86	7.34	45	330	0.150	50	0.350	116	0.150	50		0		0		0		0		0	
10-084CF INTERNAL LINING	01-19-95	7.49	660	4,943	0.207	1023		0	0.116	571	0.018	89		0		0		0	0.043	213	Phenol
IT-404-077	07-06-88	8.20		0		0		0	0.650	0	0.300	0		0		0		0		0	
DAREX 313	08-04-92	9.32	255	2,377		0		0		0		0		0		0		0		0	
DAREX B-31F	01-26-89	9.15	70	641		0		0		0		0		0		0		0		0	
220-W27-1024 WHITE	03-29-93	11.82	5,430	64,183		0		0		0		0	0.017	1091		0		0		0	
379W141 WHITE POLYESTER	06-06-97	12.20	963	11,749		0		0	0.011	129		0	0.012	141		0		0		0	
379Y62 COMBE YELLOW	07-07-97	11.00	200	2,200		0		0	0.011	24		0	0.012	26		0		0		0	
VL8M80754 LT BLUE PEEL	07-28-88	9.59		0		0		0		0		0		0		0		0		0	
DECORATION INKS	generic	1.00	1,315	1,315							0.005	7									
1170 ALUMINUM METAL	06-07-88	1.00	633,502	633,502		0		0		0		0		0		0	1.000	633502		0	
SP-1103 WAX	07-01-86	1.00	628	628		0		0		0		0		0		0		0		0	
AMR-12 WAX	07-31-91	1.00	1980	1,980		0		0		0		0		0		0		0		0	
ZINC STEARATE	06-01-92	1.00		0		0		0		0		0		0		0		0	0.900	0	Zinc
[illegible]														1330						10179	Acetone
less fugitive (assumed)							0.04	542	0.04	90					0.04	247	0.000	63	0.08	814	Acetone
Waste Solvent		7.22	1,595	11,516			0.53	6103	0.03	345					0.06	691			0.38	4376	Acetone
[illegible]														1330						4989	Acetone
[illegible]																					Acetone

'(oxidizer season + non-oxidizer season + fugitive)

J.L.CLARK
a CLARCOR company

Tube Division
TRI Fac. ID: 60515JLCLR2300W

October 20, 1997

Illinois Environmental Protection Agency
Division Of Air Pollution Control
P.O.Box 19506
Springfield, IL 62794-9506
Attn: Air Toxics Unit (ATU)

Certified Mail
#P 443 957 931

To Whom It May Concern:

This assembled report is submitted as required under State of Illinois Rules and Regulations, Title 35, Environmental Protection, Subtitle B, Air Pollution, Part 232, Subpart D. This information is a duplicate copy of the one sent to the Illinois EPA Office of Chemical Safety with no new additions or subtractions.

We are submitting a total of four (4) reports from our facility, which refer to four (4) chemicals as reported on the regular 9-page FORM R of the Toxic Chemical Release Inventory Reporting Form of the EPA, as follows:

Chemical Name	Report Year	CAS Number
Methyl Ethyl Ketone	1996	000078933
Certain Glycol Ethers	1996	N230
Toluene	1996	000108883
Aluminum (Fume or Dust)	1996	007429905

Our technical point of contact is James K. Klotz, phone number 815-961-5686, and is available should any questions or problems arise in your interpreting of our reports.

I hereby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data available to the preparers of this report.

Sincerely,

Gregory C. Gann
V. P. Operations / Technology

2300 Sixth Street, P.O. Box 7000
Rockford, Illinois 61125
815/962-8861
FAX: 815/962-0417

J.L.CLARK
a CLARCOR company

Tube Division
TRI Fac. ID: 60515JLCLR2300W

January 12, 1998

EPCRA Reporting Center
P.O. Box 3348
Merrifield, VA 22116-3348
Ref: TRI RVR

Certified Mail #P443 959 749

To Whom It May Concern:

Enclosed please find one complete copy of the Form R Reports containing toxic chemical release reporting information for J. L. Clark Tube Division.

We have identified an information discrepancy on the TRI Release Value Report that was sent back to us dated 12/11/97. The discrepancy occurred in Section 6.2, Transfers to other Off-Site Locations, whereby the RVR omitted our originally reported information. We were instructed by personnel in your office to send back to you a completed copy of our Forms R Reports.

We are submitting a total of four (4) reports from our facility, which refer to four (4) chemicals as reported on the regular 9-page FORM R, as follows:

Chemical Name	Report Year	CAS Number
Methyl Ethyl Ketone	1996	000078933
Certain Glycol Ethers	1996	N230
Toluene	1996	000108883
Aluminum (Fume or Dust)	1996	007429905

Our technical point of contact is James K. Klotz, phone number 815-961-5686, and is available should any questions or problems arise in your processing of these diskette(s).

Sincerely

James K. Klotz
Environmental Engineer

2300 Sixth Street, P.O. Box 7000
Rockford, Illinois 61125
815/962-8861
FAX: 815/962-0417

J.L.CLARK
a CLARCOR company

Tube Division
TRI Fac. ID: 60515JLCLR2300W

July 25, 1997

EPCRA Reporting Center
P.O. Box 3348
Merrifield, VA 22116-3348
Ref: Toxic Chemical Release Inventory
Magnetic Media Submission

Certified Mail
531 302 728

To Whom It May Concern:

Enclosed please find one (1) microcomputer diskette containing toxic chemical release reporting information for J. L. Clark Tube Division.

This information is submitted as required under section 313, Title III of the Superfund Amendments and Reauthorization Act of 1986 and the Pollution Prevention Act of 1990.

We are submitting a total of four (4) reports from our facility, which refer to four (4) chemicals as reported on the regular 9-page FORM R, as follows:

Chemical Name	Report Year	CAS Number
Methyl Ethyl Ketone	1996	000078933
Certain Glycol Ethers	1996	N230
Toluene	1996	000108883
Aluminum (Fume or Dust)	1996	007429905

Our technical point of contact is James K. Klotz, phone number 815-961-5686, and is available should any questions or problems arise in your processing of these diskette(s).

I hereby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data available to the preparers of this report.

Sincerely

Gregory C. Gann
V. P. Operations / Technology

2300 Sixth Street, P.O. Box 7000
Rockford, Illinois 61125
815/962-8861
FAX: 815/962-0417

J.L.CLARK
a CLARCOR company

Tube Division
TRI Fac. ID: 60515JLCLR2300W

July 25, 1997

Mr. Joe Goodner
Illinois EPA Office of Chemical Safety
P.O. Box 19276
2200 Churchill Road
Springfield, IL 62794-9276
Ref: Toxic Chemical Release Inventory
Magnetic Media Submission

Certified Mail
531 302 727

To Whom It May Concern:

Enclosed please find one (1) microcomputer diskette containing toxic chemical release reporting information for J. L. Clark Tube Division.

This information is submitted as required under section 313, Title III of the Superfund Amendments and Reauthorization Act of 1986 and the Pollution Prevention Act of 1990.

We are submitting a total of four (4) reports from our facility, which refer to four (4) chemicals as reported on the regular 9-page FORM R, as follows:

Chemical Name	Report Year	CAS Number
Methyl Ethyl Ketone	1996	000078933
Certain Glycol Ethers	1996	N230
Toluene	1996	000108883
Aluminum (Fume or Dust)	1996	007429905

Our technical point of contact is James K. Klotz, phone number 815-961-5686, and is available should any questions or problems arise in your processing of these diskette(s).

I hereby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data available to the preparers of this report.

Sincerely,

Gregory C. Gann
V. P. Operations / Technology

2300 Sixth Street, P.O. Box 7000
Rockford, Illinois 61125
815/962-8861
FAX: 815/962-0417

(IMPORTANT: Type or print; read instructions before completing form)

Form Approved OMB Number: 2070-0093
Approval Expires: 04/2000

EPA
United States Environmental Protection Agency

FORM R TOXIC CHEMICAL RELEASE INVENTORY REPORTING FORM

Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986, also known as Title III of the Superfund Amendments and Reauthorization Act

TRI FACILITY ID NUMBER: 60515JLCLR2300W

Toxic Chemical, Category or Generic Name: CERTAIN GLYCOL ETHERS

WHERE TO SEND COMPLETED FORMS:

1. EPCRA Reporting Center
   P.O Box 3348
   Merrifield, VA 22116-3348
   ATTN: TOXIC CHEMICAL RELEASE INVENTORY
2. APPROPRIATE STATE OFFICE (See instructions in Appendix F)

Enter "X" here if this is a revision: [ ]

Important: See instructions to determine when "Not Applicable (NA)" boxes should be checked.

For EPA use only

PART I. FACILITY IDENTIFICATION INFORMATION

SECTION 1. REPORTING YEAR

1996

SECTION 2. TRADE SECRET INFORMATION

2.1 Are you claiming the toxic chemical identified on page 3 trade secret?
[ ] Yes. (Answer question 2.2; Attach substantiation forms)
[X] No (Do not answer 2.2; Go to Section 3)

2.2 If yes in 2.1, is this copy: [ ] Sanitized [ ] Unsanitized

SECTION 3. CERTIFICATION (Important: Read and sign after completing all form sections

I hereby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted
using data available to the preparers of this report, the amounts and values in this report are accurate based on reasonable estimates.

Name and official title of owner/operator or senior management official: GREGORY C. GANN — V. P. OPERATIONS / TECHNOLOGY

Signature:

Date Signed: 07-25-97

SECTION 4. FACILITY IDENTIFICATION

4.1

Facility or Establishment Name	J. L. CLARK TUBE DIVISION
TRI Facility ID Number	60515JLCLR2300W
Street Address	2300 WISCONSIN AVENUE
City	DOWNERS GROVE
County	DUPAGE
State	IL
Zip Code	60515-
Mailing Address (if different from street address)	SAME
City	
State	
Zip Code	-

PUT LABEL HERE

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EPA FORM R
PART I. FACILITY IDENTIFICATION INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER
60515JLCLR2300W
Toxic Chemical, Category or Generic Name
CERTAIN GLYCOL ETHERS

SECTION 4. FACILITY IDENTIFICATION (continued)

4.2	**This report contains information for:** (Important check a or b; check c if applicable	a. [X] An entire facility	b. [ ] Part of a facility	c. [ ] A Federal facility			
4.3	**Technical Contact**	Name: JAMES K. KLOTZ	Telephone number (include area code): (815) 961-5686				
4.4	**Public Contact**	Name: DAVID J. LINDSAY	Telephone number (include area code): (815) 962-8867				
4.5	**SIC Code (4-digit)**	a. 3499	b.	c.	d.	e.	f.

		Latitude			Longitude		
4.6	**Latitude and Longitude**	Degrees	Minutes	Seconds	Degrees	Minutes	Seconds
		041	47	28	088	02	27

4.7	**Dun & Bradstreet Number(s) (9 digits)**	a. 005130000
		b.
4.8	**EPA Identification Number(s) (RCRA I.D. No.) (12 characters)**	a. ILD005130000
		b.
4.9	**Facility NPDES Permit Number(s) (9 characters)**	a. NA
		b.
4.10	**Underground Injection Well Code (UIC) I.D. Number(s) (12 digits)**	a. NA
		b.

SECTION 5. PARENT COMPANY INFORMATION

5.1	Name of Parent Company	[ ] NA CLARCOR, INC.
5.2	Parent Company's Dun & Bradstreet Number	[ ] NA 005162417

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EPA FORM R
PART II. CHEMICAL-SPECIFIC INFORMATION

TRI FACILITY ID NUMBER
60515JLCLR2300W
Toxic Chemical, Category or Generic Name
CERTAIN GLYCOL ETHERS

SECTION 1. TOXIC CHEMICAL IDENTITY

(Important: DO NOT complete this section if you complete Section 2 below.)

1.1	CAS Number (Important: Enter only one number exactly as it appears on the Section 313 list. Enter category code if reporting a chemical category.)
	N230
1.2	Toxic Chemical or Chemical Category Name (Important: Enter only one name exactly as it appears on the Section 313 list.)
	CERTAIN GLYCOL ETHERS
1.3	Generic Chemical Name (Importantonly ıç if Part 1, Section 2.1 is checked "yes". Generic Name must be structurally descriptive)
	NA

SECTION 2. MIXTURE COMPONENT IDENTITY

(Important: DO NOT complete this section if you complete Section 1 above.)

2.1	Generic Chemical Name Provided by Supplier (Important: Maximum of 70 characters, including numbers, letters, spaces, and punctuation.)
	NA

SECTION 3. ACTIVITIES AND USES OF THE TOXIC CHEMICAL AT THE FACILITY

(Important: Check all that apply.)

			If produce or import:
3.1	**Manufacture the toxic chemical:**	a. ☐ Produce b. ☐ Import	c. ☐ For on-site use/processing d. ☐ For sale/distribution e. ☐ As a byproduct f. ☐ As an impurity
3.2	**Process the toxic chemical:**	a. ☐ As a reactant b. ☐ As a formulation component	c. ☐ As an article component d. ☐ Repackaging
3.3	**Otherwise use the toxic chemical:**	a. ☒ As a chemical processing aid b. ☐ As a manufacturing aid	c. ☐ Ancillary or other use

SECTION 4. MAXIMUM AMOUNT OF THE TOXIC CHEMICAL ON-SITE AT ANY TIME DURING THE CALENDAR YEAR

4.1	03 (Enter two-digit code from instruction package.)	

EPA United States Environmental Protection Agency	EPA FORM R PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)	TRI FACILITY ID NUMBER: 60515JLCLR2300W Toxic Chemical, Category or Generic Name: CERTAIN GLYCOL ETHERS

SECTION 5. RELEASES OF THE TOXIC CHEMICAL TO THE ENVIRONMENT ON-SITE

			A. Total Release (pounds/ year) (enter range code from instructions or estimate)	B. Basis of Estimate (enter code)	C. % From Stormwater
5.1	Fugitive or non-point air emissions	☐ NA	116	O	
5.2	Stack or point air emissions	☐ NA	1162	O	
5.3	Discharges to receiving streams or water bodies (enter one name per box)				
5.3.1	Stream or Water Body Name				
NA					
5.3.2	Stream or Water Body Name				
5.3.3	Stream or Water Body Name				
5.4.1	Underground injections on-site to Class I Wells	☒ NA			
5.4.2	Underground injections on-site to Class II-V Wells	☒ NA			
5.5	Disposal to land on-site				
5.5.1A	RCRA Subtitle C landfills	☒ NA			
5.5.1B	Other landfills	☒ NA			
5.5.2	Land treatment/ application farming	☒ NA			
5.5.3	Surface impoundment	☒ NA			
5.5.4	Other disposal	☒ NA			

☐ **Check here only if additional Section 5.3 information is provided on page 5 of this form.**

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EPA FORM R
PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER
60515JLCLR2300W
Toxic Chemical, Category or Generic Name
CERTAIN GLYCOL ETHERS

SECTION 5.3 ADDITIONAL INFORMATION ON RELEASES OF THE TOXIC CHEMICAL TO THE ENVIRONMENT ON-SITE

Discharges to receiving streams or water bodies (enter one name per box)	A. Total Release (pounds/year) (enter range code from instructions or estimate)	B. Basis of Estimate (enter code)	C. % From Stormwater
5.3.4 Stream or Water Body Name			
5.3.5 Stream or Water Body Name			
5.3.6 Stream or Water Body Name			

SECTION 6. TRANSFERS OF THE TOXIC CHEMICAL IN WASTES TO OFF-SITE LOCATIONS

6.1 DISCHARGES TO PUBLICLY OWNED TREATMENT WORKS (POTW)

6.1.A Total Quantity Transferred to POTWs and Basis of Estimate

6.1.A.1 Total Transfers (pounds/year) (enter range code or estimate)	6.1.A.2 Basis of Estimate (enter code)
NA	

6.1.B POTW Name and Location Information

6.1.B.1 POTW Name		6.1.B. 2 POTW Name	
NA			
Street Address		Street Address	
City	County	City	County
State	Zip Code	State	Zip Code
	-		-

If additional pages of Part II, Section 5.3 and/or 6.1 are attached, indicate the total number of pages in this box 1 **and indicate which Part II, Section 5.3/6.1 page this is, here.** 1 **(example: 1, 2, 3, etc.)**

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EPA FORM R
PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER
60515JLCLR2300W
Toxic Chemical, Category or Generic Name
CERTAIN GLYCOL ETHERS

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS

6.2.1	Off-site EPA Identification Number (RCRA ID No.)	WID990829475	
Off-Site Location Name	WASTE RESEARCH AND RECLAMATION CO., INC.		
Street Address	5200 STATE ROAD 93		
City	EAU CLAIRE	County	EAU CLAIRE
State	WI	Zip Code	54701-
Is location under control of reporting facility or parent company?	[ ] Yes	[X] No	

A. Total Transfers (pounds/year) (enter range code or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery(enter code)
1. 346	1. O	1. M20
2.	2.	2.
3.	3.	3.
4.	4.	4.

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS

6.2.2	Off-site EPA Identification Number (RCRA ID No.)		
Off-Site Location Name			
Street Address			
City		County	
State		Zip Code	-
Is location under control of reporting facility or parent company?	[ ] Yes	[ ] No	

A. Total Transfers (pounds/year) (enter range code or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery(enter code)
1.	1.	1.
2.	2.	2.
3.	3.	3.
4.	4.	4.

If additional pages of Part II, Section 6.2 are attached, indicate the total number of pages in this box [1] and indicate which Part II, Section 6.2 page this is, here. [1] (example: 1, 2, 3, etc.)

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United States Environmental Protection Agency

EPA FORM R

PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER
60515JLCLR2300W
Toxic Chemical, Category or Generic Name
CERTAIN GLYCOL ETHERS

SECTION 7A. ON-SITE WASTE TREATMENT METHODS AND EFFICIENCY

☐ **Not Applicable (NA) - Check here if no on-site waste treatment is applied to any waste stream containing the toxic chemical or chemical category.**

a. General Waste Stream (enter code)	b. Waste Treatment Method(s) Sequence [enter 3-character code(s)]	c. Range of Influent Concentration	d. Waste Treatment Efficiency Estimate	e. Based on Operating Data?
7A.1a	7A.1b 1 F71 2 NA	7A.1c	7A.1d	7A.1e
A	3 4 5 6 7 8	4	95 %	Yes ☐ No X
7A.2a	7A.2b 1 2	7A.2c	7A.2d	7A.2e
	3 4 5 6 7 8		%	Yes ☐ No ☐
7A.3a	7A.3b 1 2	7A.3c	7A.3d	7A.3e
	3 4 5 6 7 8		%	Yes ☐ No ☐
7A.4a	7A.4b 1 2	7A.4c	7A.4d	7A.4e
	3 4 5 6 7 8		%	Yes ☐ No ☐
7A.5a	7A.5b 1 2	7A.5c	7A.5d	7A.5e
	3 4 5 6 7 8		%	Yes ☐ No ☐

If additional copies of page 7 are attached, indicate the total number of pages in this box [1] and indicate which page 7 this is, here. [1] (example: 1, 2, 3, etc.)

EPA
United States Environmental Protection Agency

EPA FORM R
PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER
60515JLCLR2300W
Toxic Chemical, Category or Generic Name
CERTAIN GLYCOL ETHERS

SECTION 7B. ON-SITE ENERGY RECOVERY PROCESSES

☐ **Not Applicable (NA) - Check here if no on-site energy recovery is applied to any waste stream containing the toxic chemical or chemical category.**

Energy Recovery Methods [enter 3-character code(s)]

1	2	3	4
NA			

SECTION 7C. ON-SITE RECYCLING PROCESSES

☐ **Not Applicable (NA) - Check here if no on-site recycling is applied to any waste stream containing the toxic chemical or chemical category.**

Recycling Methods [enter 3-character code(s)]

1.	2.	3.	4.	5.
NA				
6.	**7.**	**8.**	**9.**	**10.**

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EPA FORM R
PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER
60515JLCLR2300W
Toxic Chemical, Category or Generic Name
CERTAIN GLYCOL ETHERS

SECTION 8. SOURCE REDUCTION AND RECYCLING ACTIVITIES

All quantity estimates can be reported using up to two significant figures.		Column A Prior Year (pounds/year)	Column B Current Reporting Year (pounds/year)	Column C Following Year (pounds/year)	Column D Second Following Year (pounds/year)
8.1	Quantity released*	5488	1278	1341	1408
8.2	Quantity used for energy recovery on-site	0	0	0	0
8.3	Quantity used for energy recovery off-site	0	0	0	0
8.4	Quantity recycled on-site	0	0	0	0
8.5	Quantity recycled off-site	117	346	363	381
8.6	Quantity treated on-site	0	0	0	0
8.7	Quantity treated off-site	0	0	0	0
8.8	Quantity released to the environment as a result of remedial actions, catastropic events, or one-time events not associated with production processes (pounds/year)	0			
8.9	Production ratio or activity index	0000.83			

8.10 Did your facility engage in any source reduction activities for this chemical during the reporting year? If not, enter "NA" in Section 8.10.1 and answer Section 8.11.

	Source Reduction Activities [enter code(s)]	Methods to Identify Activity (enter codes)		
8.10.1	NA	a.	b.	c.
8.10.2		a.	b.	c.
8.10.3		a.	b.	c.
8.10.4		a.	b.	c.

		YES	NO
8.11	Is additional optional information on source reduction, recycling, or pollution control activities included with this report? (Check one box)		X

* Report releases pursuant to EPCRA Section 329(8) including "any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment." Do not include any quantity treated on-site or off-site.

(IMPORTANT: Type or print; read instructions before completing form)

Form Approved OMB Number: 2070-0093
Approval Expires: 04/2000

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FORM R TOXIC CHEMICAL RELEASE INVENTORY REPORTING FORM

Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986, also known as Title III of the Superfund Amendments and Reauthorization Act

TRI FACILITY ID NUMBER: 60515JLCLR2300W

Toxic Chemical, Category or Generic Name: METHYL ETHYL KETONE

WHERE TO SEND COMPLETED FORMS:

1. EPCRA Reporting Center
   P.O Box 3348
   Merrifield, VA 22116-3348
   ATTN: TOXIC CHEMICAL RELEASE INVENTORY
2. APPROPRIATE STATE OFFICE (See instructions in Appendix F)

Enter "X" here if this is a revision: [ ]

Important: See instructions to determine when "Not Applicable (NA)" boxes should be checked.

For EPA use only

PART I. FACILITY IDENTIFICATION INFORMATION

SECTION 1. REPORTING YEAR

1996

SECTION 2. TRADE SECRET INFORMATION

2.1 Are you claiming the toxic chemical identified on page 3 trade secret?
[ ] Yes. (Answer question 2.2; Attach substantiation forms)
[X] No (Do not answer 2.2; Go to Section 3)

2.2 If yes in 2.1, is this copy: [ ] Sanitized [ ] Unsanitized

SECTION 3. CERTIFICATION (Important: Read and sign after completing all form sections

I hereby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted
using data available to the preparers of this report. unts and values in this report are accurate based on reasonable estimates

Name and official title of owner/operator or senior management official
GREGORY C. GANN V. P. OPERATIONS / TECHNOLOGY

Signature:

Date Signed: 07-25-97

SECTION 4. FACILITY IDENTIFICATION

4.1

Facility or Establishment Name: J. L. CLARK TUBE DIVISION	TRI Facility ID Number: 60515JLCLR2300W
Street Address: 2300 WISCONSIN AVENUE	
City: DOWNERS GROVE	County: DUPAGE
State: IL	Zip Code: 60515-
Mailing Address (if different from street address): SAME	PUT LABEL HERE
City:	
State:	Zip Code: -

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EPA FORM R
PART I. FACILITY IDENTIFICATION INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER
60515JLCLR2300W
Toxic Chemical, Category or Generic Name
METHYL ETHYL KETONE

SECTION 4. FACILITY IDENTIFICATION (continued)

4.2	**This report contains information for:** (Important check a or b; check c if applicable	a. [X] An entire facility	b. [ ] Part of a facility	c. [ ] A Federal facility			
4.3	**Technical Contact**	Name: JAMES K. KLOTZ	Telephone number (include area code): (815) 961-5686				
4.4	**Public Contact**	Name: DAVID J. LINDSAY	Telephone number (include area code): (815) 962-8867				
4.5	**SIC Code (4-digit)**	a. 3499	b.	c.	d.	e.	f.

4.6	**Latitude and Longitude**	Latitude			Longitude		
		Degrees	Minutes	Seconds	Degrees	Minutes	Seconds
		041	47	28	088	02	27

4.7	**Dun & Bradstreet Number(s) (9 digits)**	a. 005130000
		b.
4.8	**EPA Identification Number(s) (RCRA I.D. No.) (12 characters)**	a. ILD005130000
		b.
4.9	**Facility NPDES Permit Number(s) (9 characters)**	a. NA
		b.
4.10	**Underground Injection Well Code (UIC) I.D. Number(s) (12 digits)**	a. NA
		b.

SECTION 5. PARENT COMPANY INFORMATION

5.1	Name of Parent Company	[ ] NA CLARCOR, INC.
5.2	Parent Company's Dun & Bradstreet Number	[ ] NA 005162417

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EPA FORM R
PART II. CHEMICAL-SPECIFIC INFORMATION

TRI FACILITY ID NUMBER
60515JLCLR2300W
Toxic Chemical, Category or Generic Name
METHYL ETHYL KETONE

SECTION 1. TOXIC CHEMICAL IDENTITY

(Important: DO NOT complete this section if you complete Section 2 below.)

1.1	CAS Number (Important: Enter only one number exactly as it appears on the Section 313 list. Enter category code if reporting a chemical category.)
	000078933
1.2	Toxic Chemical or Chemical Category Name (Important: Enter only one name exactly as it appears on the Section 313 list.)
	METHYL ETHYL KETONE
1.3	Generic Chemical Name (Importantonly if Part 1, Section 2.1 is checked "yes". Generic Name must be structurally descriptive)
	NA

SECTION 2. MIXTURE COMPONENT IDENTITY

(Important: DO NOT complete this section if you complete Section 1 above.)

2.1	Generic Chemical Name Provided by Supplier (Important: Maximum of 70 characters, including numbers, letters, spaces, and punctuation.)
	NA

SECTION 3. ACTIVITIES AND USES OF THE TOXIC CHEMICAL AT THE FACILITY

(Important: Check all that apply.)

			If produce or import:
3.1	**Manufacture the toxic chemical:**	a. ☐ Produce b. ☐ Import	c. ☐ For on-site use/processing d. ☐ For sale/distribution e. ☐ As a byproduct f. ☐ As an impurity
3.2	**Process the toxic chemical:**	a. ☐ As a reactant b. ☐ As a formulation component	c. ☐ As an article component d. ☐ Repackaging
3.3	**Otherwise use the toxic chemical:**	a. ☒ As a chemical processing aid b. ☐ As a manufacturing aid	c. ☒ Ancillary or other use

SECTION 4. MAXIMUM AMOUNT OF THE TOXIC CHEMICAL ON-SITE AT ANY TIME DURING THE CALENDAR YEAR

4.1	03 (Enter two-digit code from instruction package.)	

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EPA FORM R
PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER
60515JLCLR2300W
Toxic Chemical, Category or Generic Name
METHYL ETHYL KETONE

SECTION 5. RELEASES OF THE TOXIC CHEMICAL TO THE ENVIRONMENT ON-SITE

			A. Total Release (pounds/ year) (enter range code from instructions or estimate)	B. Basis of Estimate (enter code)	C. % From Stormwater
5.1	Fugitive or non-point air emissions	☐ NA	291	O	
5.2	Stack or point air emissions	☐ NA	3131	C	
5.3	Discharges to receiving streams or water bodies (enter one name per box)				
5.3.1	Stream or Water Body Name				
NA					
5.3.2	Stream or Water Body Name				
5.3.3	Stream or Water Body Name				
5.4.1	Underground injections on-site to Class I Wells	☒ NA			
5.4.2	Underground injections on-site to Class II-V Wells	☒ NA			
5.5	Disposal to land on-site				
5.5.1A	RCRA Subtitle C landfills	☒ NA			
5.5.1B	Other landfills	☒ NA			
5.5.2	Land treatment/ application farming	☒ NA			
5.5.3	Surface impoundment	☒ NA			
5.5.4	Other disposal	☒ NA			

☐ Check here only if additional Section 5.3 information is provided on page 5 of this form.

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EPA FORM R
PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER
60515JLCLR2300W
Toxic Chemical, Category or Generic Name
METHYL ETHYL KETONE

SECTION 5.3 ADDITIONAL INFORMATION ON RELEASES OF THE TOXIC CHEMICAL TO THE ENVIRONMENT ON-SITE

Discharges to receiving streams or water bodies (enter one name per box)	A. Total Release (pounds/year) (enter range code from instructions or estimate)	B. Basis of Estimate (enter code)	C. % From Stormwater
5.3.4 Stream or Water Body Name			
5.3.5 Stream or Water Body Name			
5.3.6 Stream or Water Body Name			

SECTION 6. TRANSFERS OF THE TOXIC CHEMICAL IN WASTES TO OFF-SITE LOCATIONS

6.1 DISCHARGES TO PUBLICLY OWNED TREATMENT WORKS (POTW)

6.1.A Total Quantity Transferred to POTWs and Basis of Estimate

6.1.A.1 Total Transfers (pounds/year) (enter range code or estimate)	6.1.A.2 Basis of Estimate (enter code)
NA	

6.1.B POTW Name and Location Information

6.1.B.1 POTW Name		6.1.B.2 POTW Name	
NA			
Street Address		Street Address	
City	County	City	County
State	Zip Code -	State	Zip Code -

If additional pages of Part II, Section 5.3 and/or 6.1 are attached, indicate the total number of pages in this box 1 **and indicate which Part II, Section 5.3/6.1 page this is, here.** 1 **(example: 1, 2, 3, etc.)**

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EPA FORM R
PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER
60515JLCLR2300W
Toxic Chemical, Category or Generic Name
METHYL ETHYL KETONE

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS

6.2.1	Off-site EPA Identification Number (RCRA ID No.)	WID990829475	
Off-Site Location Name	WASTE RESEARCH AND RECLAMATION CO., INC.		
Street Address	5200 STATE ROAD 93		
City	EAU CLAIRE	County	EAU CLAIRE
State	WI	Zip Code	54701-
Is location under control of reporting facility or parent company?	[ ] Yes	[X] No	

A. Total Transfers (pounds/year) (enter range code or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery(enter code)
1. 346	1. O	1. M20
2.	2.	2.
3.	3.	3.
4.	4.	4.

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS

6.2.2	Off-site EPA Identification Number (RCRA ID No.)		
Off-Site Location Name			
Street Address			
City		County	
State		Zip Code	-
Is location under control of reporting facility or parent company?	[ ] Yes	[ ] No	

A. Total Transfers (pounds/year) (enter range code or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery(enter code)
1.	1.	1.
2.	2.	2.
3.	3.	3.
4.	4.	4.

If additional pages of Part II, Section 6.2 are attached, indicate the total number of pages in this box [1] and indicate which Part II, Section 6.2 page this is, here. [1] (example: 1, 2, 3, etc.)

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EPA FORM R

PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER
60515JLCLR2300W
Toxic Chemical, Category or Generic Name
METHYL ETHYL KETONE

SECTION 7A. ON-SITE WASTE TREATMENT METHODS AND EFFICIENCY

☐ **Not Applicable (NA) - Check here if no on-site waste treatment is applied to any waste stream containing the toxic chemical or chemical category.**

a. General Waste Stream (enter code)	b. Waste Treatment Method(s) Sequence [enter 3-character code(s)]	c. Range of Influent Concentration	d. Waste Treatment Efficiency Estimate	e. Based on Operating Data?
7A.1a	7A.1b 1 F71 2 NA	7A.1c	7A.1d	7A.1e
A	3 4 5 6 7 8	3	95 %	Yes ☐ No X
7A.2a	7A.2b 1 2	7A.2c	7A.2d	7A.2e
	3 4 5 6 7 8		%	Yes ☐ No ☐
7A.3a	7A.3b 1 2	7A.3c	7A.3d	7A.3e
	3 4 5 6 7 8		%	Yes ☐ No ☐
7A.4a	7A.4b 1 2	7A.4c	7A.4d	7A.4e
	3 4 5 6 7 8		%	Yes ☐ No ☐
7A.5a	7A.5b 1 2	7A.5c	7A.5d	7A.5e
	3 4 5 6 7 8		%	Yes ☐ No ☐

If additional copies of page 7 are attached, indicate the total number of pages in this box 1 and indicate which page 7 this is, here. 1 (example: 1, 2, 3, etc.)

SECTION 7B. ON-SITE ENERGY RECOVERY PROCESSES

☐ **Not Applicable (NA) - Check here if no on-site energy recovery is applied to any waste stream containing the toxic chemical or chemical category.**

Energy Recovery Methods [enter 3-character code(s)]

1	2	3	4
NA			

SECTION 7C. ON-SITE RECYCLING PROCESSES

☐ **Not Applicable (NA) - Check here if no on-site recycling is applied to any waste stream containing the toxic chemical or chemical category.**

Recycling Methods [enter 3-character code(s)]

1.	2.	3.	4.	5.
NA				
6.	**7.**	**8.**	**9.**	**10.**

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United States Environmental Protection Agency

EPA FORM R
PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER
60515JLCLR2300W
Toxic Chemical, Category or Generic Name
METHYL ETHYL KETONE

SECTION 8. SOURCE REDUCTION AND RECYCLING ACTIVITIES

All quantity estimates can be reported using up to two significant figures.		Column A Prior Year (pounds/year)	Column B Current Reporting Year (pounds/year)	Column C Following Year (pounds/year)	Column D Second Following Year (pounds/year)
8.1	Quantity released*	4585	3422	3422	3593
8.2	Quantity used for energy recovery on-site	0	0	0	0
8.3	Quantity used for energy recovery off-site	0	0	0	0
8.4	Quantity recycled on-site	0	0	0	0
8.5	Quantity recycled off-site	268	346	346	363
8.6	Quantity treated on-site	0	0	0	0
8.7	Quantity treated off-site	0	0	0	0
8.8	Quantity released to the environment as a result of remedial actions, catastropic events, or one-time events not associated with production processes (pounds/year)	0			
8.9	Production ratio or activity index	0000.83			

8.10	Did your facility engage in any source reduction activities for this chemical during the reporting year? If not, enter "NA" in Section 8.10.1 and answer Section 8.11.			
	Source Reduction Activities [enter code(s)]	Methods to Identify Activity (enter codes)		
8.10.1	NA	a.	b.	c.
8.10.2		a.	b.	c.
8.10.3		a.	b.	c.
8.10.4		a.	b.	c.

8.11	Is additional optional information on source reduction, recycling, or pollution control activities included with this report? (Check one box)	YES [ ]	NO [X]

* Report releases pursuant to EPCRA Section 329(8) including "any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment." Do not include any quantity treated on-site or off-site.

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FORM R TOXIC CHEMICAL RELEASE INVENTORY REPORTING FORM

Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986, also known as Title III of the Superfund Amendments and Reauthorization Act

TRI FACILITY ID NUMBER: 60515JLCLR2300W

Toxic Chemical, Category or Generic Name: TOLUENE

WHERE TO SEND COMPLETED FORMS:

1. EPCRA Reporting Center
   P.O Box 3348
   Merrifield, VA 22116-3348
   ATTN: TOXIC CHEMICAL RELEASE INVENTORY
2. APPROPRIATE STATE OFFICE (See instructions in Appendix F)

Enter "X" here if this is a revision: [ ]

Important: See instructions to determine when "Not Applicable (NA)" boxes should be checked.

For EPA use only

PART I. FACILITY IDENTIFICATION INFORMATION

SECTION 1. REPORTING YEAR

1996

SECTION 2. TRADE SECRET INFORMATION

2.1 Are you claiming the toxic chemical identified on page 3 trade secret?
[ ] Yes. (Answer question 2.2; Attach substantiation forms)
[X] No (Do not answer 2.2; Go to Section 3)

2.2 If yes in 2.1, is this copy: [ ] Sanitized [ ] Unsanitized

SECTION 3. CERTIFICATION (Important: Read and sign after completing all form sections

I hereby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted
using data available to the preparers of this report unts and values in this report are accurate based on reasonable estimates

Name and official title of owner/operator or senior management official: GREGORY C. GANN V. P. OPERATIONS / TECHNOLOGY

Signature:

Date Signed: 07-25-97

SECTION 4. FACILITY IDENTIFICATION

4.1

Facility or Establishment Name	J. L. CLARK TUBE DIVISION
TRI Facility ID Number	60515JLCLR2300W
Street Address	2300 WISCONSIN AVENUE
City	DOWNERS GROVE
County	DUPAGE
State	IL
Zip Code	60515-
Mailing Address (if different from street address)	SAME
City	
State	
Zip Code	-

PUT LABEL HERE

EPA
United States Environmental Protection Agency

EPA FORM R
PART I. FACILITY IDENTIFICATION INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER
60515JLCLR2300W
Toxic Chemical, Category or Generic Name
TOLUENE

SECTION 4. FACILITY IDENTIFICATION (continued)

4.2	**This report contains information for:** (Important check a or b; check c if applicable	a. [X] An entire facility	b. [ ] Part of a facility	c. [ ] A Federal facility			
4.3	**Technical Contact**	Name: JAMES K. KLOTZ	Telephone number (include area code): (815) 961-5686				
4.4	**Public Contact**	Name: DAVID J. LINDSAY	Telephone number (include area code): (815) 962-8867				
4.5	**SIC Code (4-digit)**	a. 3499	b.	c.	d.	e.	f.

4.6	**Latitude and Longitude**	Latitude			Longitude		
		Degrees	Minutes	Seconds	Degrees	Minutes	Seconds
		041	47	28	088	02	27

4.7	**Dun & Bradstreet Number(s) (9 digits)**	a. 005130000
		b.
4.8	**EPA Identification Number(s) (RCRA I.D. No.) (12 characters)**	a. ILD005130000
		b.
4.9	**Facility NPDES Permit Number(s) (9 characters)**	a. NA
		b.
4.10	**Underground Injection Well Code (UIC) I.D. Number(s) (12 digits)**	a. NA
		b.

SECTION 5. PARENT COMPANY INFORMATION

5.1	Name of Parent Company	[ ] NA CLARCOR, INC.
5.2	Parent Company's Dun & Bradstreet Number	[ ] NA 005162417

EPA
United States Environmental Protection Agency

EPA FORM R
PART II. CHEMICAL-SPECIFIC INFORMATION

TRI FACILITY ID NUMBER
60515JLCLR2300W
Toxic Chemical, Category or Generic Name
TOLUENE

SECTION 1. TOXIC CHEMICAL IDENTITY

(Important: DO NOT complete this section if you complete Section 2 below.)

1.1	CAS Number (Important: Enter only one number exactly as it appears on the Section 313 list. Enter category code if reporting a chemical category.)
	000108883
1.2	Toxic Chemical or Chemical Category Name (Important: Enter only one name exactly as it appears on the Section 313 list.)
	TOLUENE
1.3	Generic Chemical Name (Important only if Part 1, Section 2.1 is checked "yes". Generic Name must be structurally descriptive)
	NA

SECTION 2. MIXTURE COMPONENT IDENTITY

(Important: DO NOT complete this section if you complete Section 1 above.)

2.1	Generic Chemical Name Provided by Supplier (Important: Maximum of 70 characters, including numbers, letters, spaces, and punctuation.)
	NA

SECTION 3. ACTIVITIES AND USES OF THE TOXIC CHEMICAL AT THE FACILITY

(Important: Check all that apply.)

3.1	**Manufacture the toxic chemical:**	a. [ ] Produce b. [ ] Import	If produce or import: c. [ ] For on-site use/processing d. [ ] For sale/distribution e. [ ] As a byproduct f. [ ] As an impurity
3.2	**Process the toxic chemical:**	a. [ ] As a reactant b. [ ] As a formulation component	c. [ ] As an article component d. [ ] Repackaging
3.3	**Otherwise use the toxic chemical:**	a. [X] As a chemical processing aid b. [ ] As a manufacturing aid	c. [X] Ancillary or other use

SECTION 4. MAXIMUM AMOUNT OF THE TOXIC CHEMICAL ON-SITE AT ANY TIME DURING THE CALENDAR YEAR

4.1	03	(Enter two-digit code from instruction package.)	

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United States Environmental Protection Agency

EPA FORM R
PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER
60515JLCLR2300W
Toxic Chemical, Category or Generic Name
TOLUENE

SECTION 5. RELEASES OF THE TOXIC CHEMICAL TO THE ENVIRONMENT ON-SITE

			A. Total Release (pounds/ year) (enter range code from instructions or estimate)	B. Basis of Estimate (enter code)	C. % From Stormwater
5.1	Fugitive or non-point air emissions	☐ NA	436	O	
5.2	Stack or point air emissions	☐ NA	3720	O	
5.3	Discharges to receiving streams or water bodies (enter one name per box)				
5.3.1	Stream or Water Body Name				
NA					
5.3.2	Stream or Water Body Name				
5.3.3	Stream or Water Body Name				
5.4.1	Underground injections on-site to Class I Wells	☒ NA			
5.4.2	Underground injections on-site to Class II-V Wells	☒ NA			
5.5	Disposal to land on-site				
5.5.1A	RCRA Subtitle C landfills	☒ NA			
5.5.1B	Other landfills	☒ NA			
5.5.2	Land treatment/ application farming	☒ NA			
5.5.3	Surface impoundment	☒ NA			
5.5.4	Other disposal	☒ NA			

☐ Check here only if additional Section 5.3 information is provided on page 5 of this form.

EPA United States Environmental Protection Agency	EPA FORM R PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)	TRI FACILITY ID NUMBER: 60515JLCLR2300W Toxic Chemical, Category or Generic Name: TOLUENE

SECTION 5.3 ADDITIONAL INFORMATION ON RELEASES OF THE TOXIC CHEMICAL TO THE ENVIRONMENT ON-SITE

Discharges to receiving streams or water bodies (enter one name per box)	A. Total Release (pounds/year) (enter range code from instructions or estimate)	B. Basis of Estimate (enter code)	C. % From Stormwater
5.3.4 Stream or Water Body Name			
5.3.5 Stream or Water Body Name			
5.3.6 Stream or Water Body Name			

SECTION 6. TRANSFERS OF THE TOXIC CHEMICAL IN WASTES TO OFF-SITE LOCATIONS

6.1 DISCHARGES TO PUBLICLY OWNED TREATMENT WORKS (POTW)

6.1.A Total Quantity Transferred to POTWs and Basis of Estimate

6.1.A.1 Total Transfers (pounds/year) (enter range code or estimate)	6.1.A.2 Basis of Estimate (enter code)
NA	

6.1.B POTW Name and Location Information

6.1.B.1 POTW Name		6.1.B.2 POTW Name	
NA			
Street Address		Street Address	
City	County	City	County
State	Zip Code -	State	Zip Code -

If additional pages of Part II, Section 5.3 and/or 6.1 are attached, indicate the total number of pages in this box 1 **and indicate which Part II, Section 5.3/6.1 page this is, here.** 1 **(example: 1, 2, 3, etc.)**

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EPA FORM R
PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER
60515JLCLR2300W
Toxic Chemical, Category or Generic Name
TOLUENE

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS

6.2.1	Off-site EPA Identification Number (RCRA ID No.)	WID990829475	
Off-Site Location Name	WASTE RESEARCH AND RECLAMATION CO., INC.		
Street Address	5200 STATE ROAD 93		
City	EAU CLAIRE	County	EAU CLAIRE
State	WI	Zip Code	54701-
Is location under control of reporting facility or parent company?	[ ] Yes	[X] No	

A. Total Transfers (pounds/year) (enter range code or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery(enter code)
1. 6261	1. O	1. M20
2.	2.	2.
3.	3.	3.
4.	4.	4.

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS

6.2.2	Off-site EPA Identification Number (RCRA ID No.)		
Off-Site Location Name			
Street Address			
City		County	
State		Zip Code	-
Is location under control of reporting facility or parent company?	[ ] Yes	[ ] No	

A. Total Transfers (pounds/year) (enter range code or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery(enter code)
1.	1.	1.
2.	2.	2.
3.	3.	3.
4.	4.	4.

If additional pages of Part II, Section 6.2 are attached, indicate the total number of pages in this box [1] and indicate which Part II, Section 6.2 page this is, here. [1] (example: 1, 2, 3, etc.)

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EPA FORM R

PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER
60515JLCLR2300W
Toxic Chemical, Category or Generic Name
TOLUENE

SECTION 7A. ON-SITE WASTE TREATMENT METHODS AND EFFICIENCY

☐ **Not Applicable (NA) - Check here if no on-site waste treatment is applied to any waste stream containing the toxic chemical or chemical category.**

a. General Waste Stream (enter code)	b. Waste Treatment Method(s) Sequence [enter 3-character code(s)]	c. Range of Influent Concentration	d. Waste Treatment Efficiency Estimate	e. Based on Operating Data?
7A.1a	7A.1b 1 F71 2 NA	7A.1c	7A.1d	7A.1e
A	3 4 5 6 7 8	4	95 %	Yes ☐ No ☒
7A.2a	7A.2b 1 2	7A.2c	7A.2d	7A.2e
	3 4 5 6 7 8		%	Yes ☐ No ☐
7A.3a	7A.3b 1 2	7A.3c	7A.3d	7A.3e
	3 4 5 6 7 8		%	Yes ☐ No ☐
7A.4a	7A.4b 1 2	7A.4c	7A.4d	7A.4e
	3 4 5 6 7 8		%	Yes ☐ No ☐
7A.5a	7A.5b 1 2	7A.5c	7A.5d	7A.5e
	3 4 5 6 7 8		%	Yes ☐ No ☐

If additional copies of page 7 are attached, indicate the total number of pages in this box [1] and indicate which page 7 this is, here. [1] (example: 1, 2, 3, etc.)

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EPA FORM R
PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER
60515JLCLR2300W
Toxic Chemical, Category or Generic Name
TOLUENE

SECTION 7B. ON-SITE ENERGY RECOVERY PROCESSES

☐ **Not Applicable (NA) - Check here if no on-site energy recovery is applied to any waste stream containing the toxic chemical or chemical category.**

Energy Recovery Methods [enter 3-character code(s)]

1	2	3	4
NA			

SECTION 7C. ON-SITE RECYCLING PROCESSES

☐ **Not Applicable (NA) - Check here if no on-site recycling is applied to any waste stream containing the toxic chemical or chemical category.**

Recycling Methods [enter 3-character code(s)]

1.	2.	3.	4.	5.
NA				
6.	**7.**	**8.**	**9.**	**10.**

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EPA FORM R
PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER
60515JLCLR2300W
Toxic Chemical, Category or Generic Name
TOLUENE

SECTION 8. SOURCE REDUCTION AND RECYCLING ACTIVITIES

All quantity estimates can be reported using up to two significant figures.		Column A Prior Year (pounds/year)	Column B Current Reporting Year (pounds/year)	Column C Following Year (pounds/year)	Column D Second Following Year (pounds/year)
8.1	Quantity released*	4690	4156	4156	4364
8.2	Quantity used for energy recovery on-site	0	0	0	0
8.3	Quantity used for energy recovery off-site	0	0	0	0
8.4	Quantity recycled on-site	0	0	0	0
8.5	Quantity recycled off-site	6693	6291	6291	6606
8.6	Quantity treated on-site	0	0	0	0
8.7	Quantity treated off-site	0	0	0	0
8.8	Quantity released to the environment as a result of remedial actions, catastropic events, or one-time events not associated with production processes (pounds/year)	0			
8.9	Production ratio or activity index	0000.83			

8.10	Did your facility engage in any source reduction activities for this chemical during the reporting year? If not, enter "NA" in Section 8.10.1 and answer Section 8.11.			
	Source Reduction Activities [enter code(s)]	Methods to Identify Activity (enter codes)		
8.10.1	NA	a.	b.	c.
8.10.2		a.	b.	c.
8.10.3		a.	b.	c.
8.10.4		a.	b.	c.

8.11	Is additional optional information on source reduction, recycling, or pollution control activities included with this report? (Check one box)	YES [ ]	NO [X]

* Report releases pursuant to EPCRA Section 329(8) including "any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment." Do not include any quantity treated on-site or off-site.

(IMPORTANT: Type or print; read instructions before completing form)

Form Approved OMB Number: 2070-0093
Approval Expires: 04/2000

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FORM R TOXIC CHEMICAL RELEASE INVENTORY REPORTING FORM

Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986, also known as Title III of the Superfund Amendments and Reauthorization Act

TRI FACILITY ID NUMBER: 60515JLCLR2300W

Toxic Chemical, Category or Generic Name: ALUMINUM (FUME OR DUST)

WHERE TO SEND COMPLETED FORMS:
1. EPCRA Reporting Center, P.O Box 3348, Merrifield, VA 22116-3348, ATTN: TOXIC CHEMICAL RELEASE INVENTORY
2. APPROPRIATE STATE OFFICE (See instructions in Appendix F)

Enter "X" here if this is a revision: [ ]

Important: See instructions to determine when "Not Applicable (NA)" boxes should be checked.

For EPA use only

PART I. FACILITY IDENTIFICATION INFORMATION

SECTION 1. REPORTING YEAR: 1996

SECTION 2. TRADE SECRET INFORMATION

2.1 Are you claiming the toxic chemical identified on page 3 trade secret?
[ ] Yes. (Answer question 2.2; Attach substantiation forms)
[X] No (Do not answer 2.2; Go to Section 3)

2.2 If yes in 2.1, is this copy: [ ] Sanitized [ ] Unsanitized

SECTION 3. CERTIFICATION (Important: Read and sign after completing all form sections

I hereby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted
using data available to the preparers of this report, the amounts and values in this report are accurate based on reasonable estimates.

Name and official title of owner/operator or senior management official: GREGORY C. GANN — V. P. OPERATIONS / TECHNOLOGY

Signature:

Date Signed: 07-25-97

SECTION 4. FACILITY IDENTIFICATION

4.1

Facility or Establishment Name: J. L. CLARK TUBE DIVISION	TRI Facility ID Number: 60515JLCLR2300W
Street Address: 2300 WISCONSIN AVENUE	
City: DOWNERS GROVE	County: DUPAGE
State: IL	Zip Code: 60515-
Mailing Address (if different from street address): SAME	PUT LABEL HERE
City:	
State:	Zip Code: -

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EPA FORM R
PART I. FACILITY IDENTIFICATION INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER
60515JLCLR2300W
Toxic Chemical, Category or Generic Name
ALUMINUM (FUME OR DUST)

SECTION 4. FACILITY IDENTIFICATION (continued)

4.2	**This report contains information for:** (Important check a or b; check c if applicable	a. [X] An entire facility	b. [ ] Part of a facility c. [ ] A Federal facility
4.3	**Technical Contact**	Name: JAMES K. KLOTZ	Telephone number (include area code): (815) 961-5686
4.4	**Public Contact**	Name: DAVID J. LINDSAY	Telephone number (include area code): (815) 962-8867

4.5	**SIC Code (4-digit)**	a. 3499	b.	c.	d.	e.	f.

		Latitude			Longitude		
4.6	**Latitude and Longitude**	Degrees	Minutes	Seconds	Degrees	Minutes	Seconds
		041	47	28	088	02	27

4.7	**Dun & Bradstreet Number(s) (9 digits)**	a. 005130000 b.
4.8	**EPA Identification Number(s) (RCRA I.D. No.) (12 characters)**	a. ILD005130000 b.
4.9	**Facility NPDES Permit Number(s) (9 characters)**	a. NA b.
4.10	**Underground Injection Well Code (UIC) I.D. Number(s) (12 digits)**	a. NA b.

SECTION 5. PARENT COMPANY INFORMATION

5.1	Name of Parent Company	[ ] NA CLARCOR, INC.
5.2	Parent Company's Dun & Bradstreet Number	[ ] NA 005162417

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EPA FORM R
PART II. CHEMICAL-SPECIFIC INFORMATION

TRI FACILITY ID NUMBER
60515JLCLR2300W
Toxic Chemical, Category or Generic Name
ALUMINUM (FUME OR DUST)

SECTION 1. TOXIC CHEMICAL IDENTITY

(Important: DO NOT complete this section if you complete Section 2 below.)

1.1	CAS Number (Important: Enter only one number exactly as it appears on the Section 313 list. Enter category code if reporting a chemical category.)
	007429905
1.2	Toxic Chemical or Chemical Category Name (Important: Enter only one name exactly as it appears on the Section 313 list.)
	ALUMINUM (FUME OR DUST)
1.3	Generic Chemical Name (Importantonly if Part 1, Section 2.1 is checked "yes". Generic Name must be structurally descriptive)
	NA

SECTION 2. MIXTURE COMPONENT IDENTITY

(Important: DO NOT complete this section if you complete Section 1 above.)

2.1	Generic Chemical Name Provided by Supplier (Important: Maximum of 70 characters, including numbers, letters, spaces, and punctuation.)
	NA

SECTION 3. ACTIVITIES AND USES OF THE TOXIC CHEMICAL AT THE FACILITY

(Important: Check all that apply.)

			If produce or import:
3.1	**Manufacture the toxic chemical:**	a. ☐ Produce b. ☐ Import	c. ☐ For on-site use/processing d. ☐ For sale/distribution e. ☐ As a byproduct f. ☐ As an impurity
3.2	**Process the toxic chemical:**	a. ☐ As a reactant b. ☐ As a formulation component	c. ☒ As an article component d. ☐ Repackaging
3.3	**Otherwise use the toxic chemical:**	a. ☐ As a chemical processing aid b. ☐ As a manufacturing aid	c. ☐ Ancillary or other use

SECTION 4. MAXIMUM AMOUNT OF THE TOXIC CHEMICAL ON-SITE AT ANY TIME DURING THE CALENDAR YEAR

4.1	05 (Enter two-digit code from instruction package.)	

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EPA FORM R
PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER
60515JLCLR2300W
Toxic Chemical, Category or Generic Name
ALUMINUM (FUME OR DUST)

SECTION 5. RELEASES OF THE TOXIC CHEMICAL TO THE ENVIRONMENT ON-SITE

			A. Total Release (pounds/ year) (enter range code from instructions or estimate)	B. Basis of Estimate (enter code)	C. % From Stormwater
5.1	Fugitive or non-point air emissions	☐ NA	77	O	
5.2	Stack or point air emissions	☒ NA			
5.3	Discharges to receiving streams or water bodies (enter one name per box)				
5.3.1	Stream or Water Body Name				
NA					
5.3.2	Stream or Water Body Name				
5.3.3	Stream or Water Body Name				
5.4.1	Underground injections on-site to Class I Wells	☒ NA			
5.4.2	Underground injections on-site to Class II-V Wells	☒ NA			
5.5	Disposal to land on-site				
5.5.1A	RCRA Subtitle C landfills	☒ NA			
5.5.1B	Other landfills	☒ NA			
5.5.2	Land treatment/ application farming	☒ NA			
5.5.3	Surface impoundment	☒ NA			
5.5.4	Other disposal	☒ NA			

☐ **Check here only if additional Section 5.3 information is provided on page 5 of this form.**

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EPA FORM R
PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER
60515JLCLR2300W
Toxic Chemical, Category or Generic Name
ALUMINUM (FUME OR DUST)

SECTION 5.3 ADDITIONAL INFORMATION ON RELEASES OF THE TOXIC CHEMICAL TO THE ENVIRONMENT ON-SITE

Discharges to receiving streams or water bodies (enter one name per box)	A. Total Release (pounds/year) (enter range code from instructions or estimate)	B. Basis of Estimate (enter code)	C. % From Stormwater
5.3.4 Stream or Water Body Name			
5.3.5 Stream or Water Body Name			
5.3.6 Stream or Water Body Name			

SECTION 6. TRANSFERS OF THE TOXIC CHEMICAL IN WASTES TO OFF-SITE LOCATIONS

6.1 DISCHARGES TO PUBLICLY OWNED TREATMENT WORKS (POTW)

6.1.A Total Quantity Transferred to POTWs and Basis of Estimate

6.1.A.1 Total Transfers (pounds/year) (enter range code or estimate)	6.1.A.2 Basis of Estimate (enter code)
NA	

6.1.B POTW Name and Location Information

6.1.B.1 POTW Name		6.1.B. 2 POTW Name	
NA			
Street Address		Street Address	
City	County	City	County
State	Zip Code	State	Zip Code
	-		-

If additional pages of Part II, Section 5.3 and/or 6.1 are attached, indicate the total number of pages in this box 1 **and indicate which Part II, Section 5.3/6.1 page this is. here.** 1 **(example: 1, 2, 3, etc.)**

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EPA FORM R
PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER
60515JLCLR2300W
Toxic Chemical, Category or Generic Name
ALUMINUM (FUME OR DUST)

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS

6.2.1 Off-site EPA Identification Number (RCRA ID No.): NA

Off-Site Location Name:

Street Address:

City: County:

State: Zip Code: Is location under control of reporting facility or parent company? ☐ Yes ☐ No

A. Total Transfers (pounds/year) (enter range code or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery(enter code)
1.	1.	1.
2.	2.	2.
3.	3.	3.
4.	4.	4.

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS

6.2.2 Off-site EPA Identification Number (RCRA ID No.):

Off-Site Location Name:

Street Address:

City: County:

State: Zip Code: Is location under control of reporting facility or parent company? ☐ Yes ☐ No

A. Total Transfers (pounds/year) (enter range code or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery(enter code)
1.	1.	1.
2.	2.	2.
3.	3.	3.
4.	4.	4.

If additional pages of Part II, Section 6.2 are attached, indicate the total number of pages in this box [1] and indicate which Part II, Section 6.2 page this is, here. [1] (example: 1, 2, 3, etc.)

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EPA FORM R

PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER
60515JLCLR2300W
Toxic Chemical, Category or Generic Name
ALUMINUM (FUME OR DUST)

SECTION 7A. ON-SITE WASTE TREATMENT METHODS AND EFFICIENCY

☐ **Not Applicable (NA) - Check here if no on-site waste treatment is applied to any waste stream containing the toxic chemical or chemical category.**

a. General Waste Stream (enter code)	b. Waste Treatment Method(s) Sequence [enter 3-character code(s)]	c. Range of Influent Concentration	d. Waste Treatment Efficiency Estimate	e. Based on Operating Data?
7A.1a	7A.1b 1 ☐ 2 ☐	7A.1c	7A.1d	7A.1e
NA	3 ☐ 4 ☐ 5 ☐ 6 ☐ 7 ☐ 8 ☐		%	Yes ☐ No ☐
7A.2a	7A.2b 1 ☐ 2 ☐	7A.2c	7A.2d	7A.2e
	3 ☐ 4 ☐ 5 ☐ 6 ☐ 7 ☐ 8 ☐		%	Yes ☐ No ☐
7A.3a	7A.3b 1 ☐ 2 ☐	7A.3c	7A.3d	7A.3e
	3 ☐ 4 ☐ 5 ☐ 6 ☐ 7 ☐ 8 ☐		%	Yes ☐ No ☐
7A.4a	7A.4b 1 ☐ 2 ☐	7A.4c	7A.4d	7A.4e
	3 ☐ 4 ☐ 5 ☐ 6 ☐ 7 ☐ 8 ☐		%	Yes ☐ No ☐
7A.5a	7A.5b 1 ☐ 2 ☐	7A.5c	7A.5d	7A.5e
	3 ☐ 4 ☐ 5 ☐ 6 ☐ 7 ☐ 8 ☐		%	Yes ☐ No ☐

If additional copies of page 7 are attached, indicate the total number of pages in this box [1] and indicate which page 7 this is, here. [1] (example: 1, 2, 3, etc.)

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EPA FORM R
PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER
60515JLCLR2300W
Toxic Chemical, Category or Generic Name
ALUMINUM (FUME OR DUST)

SECTION 7B. ON-SITE ENERGY RECOVERY PROCESSES

☐ **Not Applicable (NA) - Check here if no on-site energy recovery is applied to any waste stream containing the toxic chemical or chemical category.**

Energy Recovery Methods [enter 3-character code(s)]

1	2	3	4
NA			

SECTION 7C. ON-SITE RECYCLING PROCESSES

☐ **Not Applicable (NA) - Check here if no on-site recycling is applied to any waste stream containing the toxic chemical or chemical category.**

Recycling Methods [enter 3-character code(s)]

1.	2.	3.	4.	5.
NA				
6.	**7.**	**8.**	**9.**	**10.**

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EPA FORM R
PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER
60515JLCLR2300W
Toxic Chemical, Category or Generic Name
ALUMINUM (FUME OR DUST)

SECTION 8. SOURCE REDUCTION AND RECYCLING ACTIVITIES

All quantity estimates can be reported using up to two significant figures.		Column A Prior Year (pounds/year)	Column B Current Reporting Year (pounds/year)	Column C Following Year (pounds/year)	Column D Second Following Year (pounds/year)
8.1	Quantity released*	86	77	77	81
8.2	Quantity used for energy recovery on-site	0	0	0	0
8.3	Quantity used for energy recovery off-site	0	0	0	0
8.4	Quantity recycled on-site	0	0	0	0
8.5	Quantity recycled off-site	0	0	0	0
8.6	Quantity treated on-site	0	0	0	0
8.7	Quantity treated off-site	0	0	0	0
8.8	Quantity released to the environment as a result of remedial actions, catastropic events, or one-time events not associated with production processes (pounds/year)	0			
8.9	Production ratio or activity index	0000.83			

8.10	Did your facility engage in any source reduction activities for this chemical during the reporting year? If not, enter "NA" in Section 8.10.1 and answer Section 8.11.			
	Source Reduction Activities [enter code(s)]	Methods to Identify Activity (enter codes)		
8.10.1	NA	a.	b.	c.
8.10.2		a.	b.	c.
8.10.3		a.	b.	c.
8.10.4		a.	b.	c.

8.11	Is additional optional information on source reduction, recycling, or pollution control activities included with this report? (Check one box)	YES [ ]	NO [X]

* Report releases pursuant to EPCRA Section 329(8) including "any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment." Do not include any quantity treated on-site or off-site.

AFR Software Hotline 703 - 816-4434 8am - 4:30p

Emergency Planning Hotline 800 535-0202 8:30am - 7:30pm.
703 412-9877

EPA Form # 9350-1, revised April 1997

Report can be filed electronically → needs cover letter use AFR software

Tube Div.

ection 6.2 Total waste shipped offsite by UBR → 1595 gal. 11520 lbs.

estimates
3 % Glycol Ether → 345.6 lbs.
40 % Acetone → ~~6220.8~~ lbs.
54 % Toluene → 6220.8 lbs.
3 % MEK → 345.6 lbs.

ection 8.8 Production ratio = $\frac{\text{1996 Production}}{\text{1995 Production}} = \frac{47455067}{57267869} = \underline{0.829}$

pounds/numbers taken from Form R spreadsheet (5/1/97)
007429-90-5 Aluminum total 1,544,200 lbs. (not living) so Multiply 50%.
↳ 772100 lbs.
Less 0.1% fugitive 77.2 lbs.
772022.8 lbs.

Acetone → not reportable

00078-93-3 MEK 7264
Less fugitive 4% 290.6
6937.4
Less waste 345.6
6591.8 lbs.

Stack Emissions
Summer (7/12) × 10%
(7/12)(6591.8 lbs)(10%) = 384.5 l
Winter (5/12)
(5/12)(6591.8 lbs.) = 2746.6 l
3131 lb

J. L. Clark - Tube Division
Form R 1996, updated 5/1/97 for the Tube Div Air Emissions report

PRODUCT	ISSUE	UNIT	LBS/GAL	TOTAL UNITS	TOTAL LBS	%	MIBK	%	TOLUENE	%	GLYCOL E	%	XYLENE	%	NAPTHAL	%	FORMALD	%	TRIMETH	%	METHETHB	%	ALUMINUM	%	MISC	NAME
374-C27-5020 H23 Lining	06-16-92	GAL	7.52	289	2,173	0.038	83	0.139	302	0.061	133	0.011	24		0		0		0		0		0	0.383	832	MEK
374-C27-4033 XR 3164	09-01-92	GAL	8.05		0		0		0		0	0.022	0		0		0	0.091	0	0.022	0		0	0.001	0	Vinyl Acetat
375-W27-5029 Peel 3817	03-14-89	GAL	9.57	30	287		0		0		0		0		0		0		0		0		0		0	
222-Y27-2011 Desenex Yellow	05-16-90	GAL	11.69	203	2,373		0		0		0		0		0		0		0		0		0	0.075	178	Lead
222-R27-2012 ROSE	05-05-94	GAL	11.8	108	1,274		0		0		0		0	0.017	22		0	0.010	13		0		0		0	
222-Y27-2008 BR. YELLOW	04-15-93	GAL	11.32	270	3,056		0		0		0		0	0.019	58		0		0		0		0		0	
375-Z27-5048 XB2666 AAL	06-21-94	GAL	8.31		0		0		0		0		0		0		0	0.065	0		0		0	0.001	0	Vinyl Acetat
375-E27-0006 AL. ADD	11-14-94	GAL	8.11	24	195		0		0		0	0.013	3		0		0	0.087	17		0	0.016	3		0	
PE1090	04-10-95	GAL	7.68	312	2,396	0.050	120	0.100	240		0	0.050	120		0	0.001	2		0		0		0	0.350	839	MEK
XR1215 INTERNAL LINING	07-29-88	GAL	8.07		0	0.010	0		0		0	0.526	0		0		0		0		0		0	0.005	0	Propylene O
660 SOLVENT	12-11-93	GAL	7.01	3,465	24,290		0	0.560	13602		0		0		0		0		0		0		0	0.440	10687	Acetone
MEK	11-15-85	GAL	6.73	831	5,593		0		0		0		0		0		0		0		0		0	1.000	5593	MEK
MINERAL SPIRITS	04-08-86	GAL	6.49	110	714		0		0		0		0		0		0		0		0		0		0	
GLYCOL ETHER DB ACETATE	03-09-87	GAL	8.18		0		0		0	1.000	0		0		0		0		0		0		0		0	
GLYCOL ETHER EB ACETATE	04-08-87	GAL	7.85	55	432		0		0	1.000	432		0		0		0		0		0		0		0	
2300 VINYL REDUCER	07-00-86	GAL	7.61		0		0		0		0		0		0		0		0		0		0		0	
150 SOLVENT	04-10-86	GAL	8.22	55	452		0		0		0		0	0.090	41		0		0		0		0		0	
S5061-041 GOLD LINING	09-22-86	GAL	7.34	150	1,101	0.150	165	0.350	385	0.150	165		0		0		0		0		0		0		0	
10-084CF INTERNAL LINING	01-19-95	GAL	7.49	822	6,157	0.207	1274		0	0.116	712	0.018	111		0	0.005	30	0.052	317		0		0	0.043	265	Phenol
IT-404-077	07-06-88	GAL	8.20	275	2,255		0		0	0.650	1466	0.300	677		0		0		0		0		0		0	
DAREX 313	08-04-92	GAL	9.32	165	1,538		0		0		0		0		0		0		0		0		0	0.005	8	Ammonia
DAREX B-31F	01-26-89	GAL	9.15	60	549		0		0		0		0		0		0		0		0		0	0.005	3	Ammonia
220-W27-1024 WHITE	03-29-93	GAL	11.82	6,088	71,960		0		0		0		0	0.017	1223		0		0		0		0		0	
375-W27-5029 WHITE PEEL	04-26-91	GAL	9.57	30	287		0		0		0		0		0		0		0		0		0	0.001	0	Vinyl Acetat
VL8M80754 LT BLUE PEEL	07-28-88	GAL	9.59		0		0		0		0		0		0		0		0		0		0		0	
DECORATION INKS	generic	LBS	1.00	1,266	1,266							0.005	6													
IMPROVED POWER PLAY	05-00-87	GAL	9.02		0		0		0	0.120	0		0		0		0		0		0		0		0	
DAREX OILPROOF W9113S	11-12-85	GAL	9.07		0		0		0		0		0		0		0		0		0		0	0.005	0	Ammonia
NITRIC ACID	08-07-78	GAL	11.73		0		0		0		0		0		0		0		0		0		0	1.000	0	Nitric Acid
TOOL STEELS	04-00-91	LBS	1.00		0		0		0		0		0		0		0		0		0	0.020	0	0.270	0	Chromium
CEMENTED CARBIDE NICKEL BI	11-05-85	LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.180	0	Nickel
CAST COBALT ALLOY	11-22-85	LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.500	0	Cobalt
MILD STEEL ELECTRODES	11-00-85	LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.041	0	Manganese
WELCO 15-15EC	11-25-84	LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.600	0	Copper
1170 ALUMINUM METAL	06-07-88	LBS	1.00	[illegible]	700 metric tons, → 1,540,200 lbs.						0		0		0		0		0		0		855731		0	
CEMENTED CARBIDE COBALT	05-01-89	LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.250	0	Cobalt
BRAZING ALLOY		LBS	1.00		0		0		0		0		0		0		0		0		0		0		0	
COPPER	04-01-86	LBS	1.00		0		0		0		0		0		0		0		0		0		0	1.000	0	Copper
TITANIUM	04-01-86	LBS	1.00		0		0		0		0		0		0		0		0		0	0.060	0	0.050	0	Manganese
STAINLESS STEEL	04-01-86	LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.300	0	Chromium
ALLOY STEEL	04-01-86	LBS	1.00		0		0		0		0		0		0		0		0		0	0.020	0	0.050	0	Nickel
ALUMINUM ALLOYS	04-01-86	LBS	1.00		0		0		0		0		0		0		0		0		0	0.997	0	0.100	0	Copper
CARBON STEEL	04-01-86	LBS	1.00		0		0		0		0		0		0		0		0		0	0.010	0	0.020	0	Manganese
BRONZE	04-01-86	LBS	1.00		0		0		0		0		0		0		0		0		0	0.140	0	0.990	0	Copper
BRASS	04-01-86	LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.700	0	Copper
NICKEL BASED ALLOY	04-01-86	LBS	1.00		0		0		0		0		0		0		0		0		0	0.050	0	0.480	0	Chromium
CERTANIUM 701 ALLOY	06-23-88	LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.010	0	Manganese
SP-1103 WAX	07-01-86	LBS	1.00	3130	3,130		0		0		0		0		0		0		0		0		0		0	
AMR-12 WAX	07-31-91	LBS	1.00	1782	1,782		0		0		0		0		0		0		0		0		0		0	
ZINC STEARATE	06-01-92	LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.900	0	Zinc
RESINOID BONDED GRIND WH	02-11-92	LBS	1.00				0		0		0		0		0		0		0		0	0.900	0		0	
GRIND-O-FLEX	06-30-92	LBS	1.00				0		0		0		0		0		0		0		0	0.600	0		0	MEK to 10687 ACETONE
		TOTAL					1642.0		14529.3		2906.9		939.9		1343.7		31.9		347.1		0.0		855734.1		18404.5	
Waste Solvent		GAL	7.01	1,595	11,181			0.56	6261															0.44	4920	Acetone
less 8% fugitive			7.01	127	890			0.56	499															0.44	392	Acetone

1995 numbers

J. L. CLARK - TUBE DIVISION
2300 WISCONSIN AVENUE
DOWNERS GROVE, IL 60515-
TRI Fac. ID #60515JLCLR2300W
August 9, 1996

EPCRA Reporting Center
P.O. Box 3348
Merrifield, VA 22116-3342
Attn: Toxic Chemical Release Inventory
Magnetic Media Submission

To Whom It May Concern:

Enclosed please find one (1) microcomputer diskette containing toxic chemical release reporting information for:

J. L. CLARK - TUBE DIVISION

This information is submitted as required under section 313, Title III of the Superfund Amendments and Reauthorization Act of 1986 and the Pollution Prevention Act of 1990.

We are submitting a total of four (4) reports from our facility, which refer to (4)chemicals.

FOUR (4) chemicals are reported on the regular 9-page FORM R, as follows:

Chemical Name	RY	CAS Number
ALUMINUM (FUME OR DUST)	1995	007429-90-5
TOLUENE	1995	000108-88-3
METHYL ETHYL KETONE	1995	000078-93-3
GLYCOL ETHERS	1995	N230

PENALTY FOR PRIVATE USE
AVOID PAYMENT OF POSTAGE $300

Our technical point of contact is:

JAMES K. KLOTZ, Phone Number: (815) 961-5686,

and is available should any questions or problems arise in your processing of these diskettes.

I hereby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data available to the preparers of this report.

Sincerely yours,

Gordon E. Verweyst

GORDON E. VERWEYST
VICE PRESIDENT TECHNOLOGY
J. L. CLARK - TUBE DIVISION

Enclosures

J.L. CLARK
a member of the CLARCOR consumer products group

August 8, 1996

Mr. Joe Goodner
Emergency Planning Unit
Office of Chemical Safety
Illinois EPA
P. O. Box 19276
Springfield, IL 62794-9276

Certified Mail
P 242 082 132

Dear Mr. Goodner:

Enclosed please find one (1) microcomputer diskette containing toxic chemical release reporting information for J. L. Clark - Tube Division.

This information is submitted as required under section 313, Title III of the Superfund Amendments and Reauthorization Act of 1986 and the Pollution Prevention Act of 1990.

We are submitting a total of four (4) reports from our facility, which refer to (4) chemicals as reported on the regular 9-page FORM R, as follows:

Chemical Name	RY	CAS Number
Aluminum (Fume or Dust)	1995	007429-90-5
Toluene	1995	000108-88-3
Methyl Ethyl Ketone	1995	000078-93-3
Glycol Ethers	1995	N230

Our technical point of contact is James K. Klotz, phone number (815) 961-5686 and is available should any questions of problems arise in your processing of these diskettes.

I hereby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data available to the preparers of this report.

Sincerely,

Gordon E. VerWeyst

Gordon E. VerWeyst
Vice President-Technology

2300 Sixth Street, P.O. Box 7000
Rockford, Illinois 61125
815/962-8861
FAX: 815/962-0417

J.
2300 SI
PO BOX
ROCKFOR

PRODUCTIVITY INDEX

$\frac{1995\ PROD}{1994\ PROD} = \frac{57,267,869}{64,853,000}$ 0.

TUBE 1995 FORM R

① ALUMINUM 855,649

Less 0.01% Fugitive 85.6#

1996 } Estimate 5% increase in business (Set 8.1
1997 }

② ACETONE 12554

Less fugitive 3% 377

12177

Less Waste Solvent 5259

6,918

Summer 404 ~~5534~~ 4036 x 10% = 404

Winter Total ÷ 5mos ~~1384~~ 2882

3286

③ MEK 10334

Less fugitive 4% 413

9921

Less Waste 2.7% 268

9653

Summer ~~588~~ 563 ~~5727~~ 5631 x 10% ~~582~~ 563

Winter (5/12) ~~4134~~ 4022

~~4722~~ 4585

	Max Qty
MEK	737
H23	778
PETOTO	581
	2096

J.L. CLARK-Tube Division

A CLARCOR Company

April 19, 1996

Jim Klotz

cc: J Benton, W Pruyne

Subject: **Community Right to Know**

Attached is the information you requested in your memo of April 4, 1996. Please let us know if you need anything additional to satisfy this reporting requirement.

Al Moore

	Waste			Recycle		
DATE	TOTAL COST	COST PER YARD	NO. OF YARDS	TOTAL COST	COST PER YARD	NO. OF YARDS
01/01/95	351.00	6.75	52.00	147.50	2.50	59.00
02/01/95	384.75	6.75	57.00	182.50	2.50	73.00
03/01/95	398.25	6.75	59.00	202.50	2.50	81.00
04/01/95	506.25	6.75	75.00	130.00	2.50	52.00
05/01/95	398.25	6.75	59.00	182.50	2.50	73.00
06/01/95	438.75	6.75	65.00	177.50	2.50	71.00
07/01/95	432.00	6.75	64.00	217.50	2.50	87.00
08/01/95	303.75	6.75	45.00	203.75	2.50	81.50
09/01/95	519.75	6.75	77.00	277.50	2.50	111.00
10/01/95	452.25	6.75	67.00	206.25	2.50	82.50
11/01/95	432.00	6.75	64.00	217.50	2.50	87.00
12/01/95	452.25	6.75	67.00	210.00	2.50	84.00
	$5,069.25	$6.75	751.00	$2,355.00	$2.50	942.00

PRODUCTION HOURS BY LINE IN 1995

LINE	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
1	404	250	375	315	321	380	294	265	257	252	217	184
2	257	186	276	107	262	178	112	142	274	161	189	187
3	269	283	304	197	183	170	220	227	264	192	242	200
4	193	235	243	256	162	155	134	127	179		19	260
5	242	161	306	240	137	226	217	114	234	206	158	102
6	113	108	85	113	91	125	110	102	133	61	24	83
7	283	345	296	286	289	250	218	172	298	236	239	253
8	242	309	314	268	198	323	192	142	201	263	187	200
	2,002	1,876	2,198	1,781	1,643	1,808	1,496	1,291	1,838	1,371	1,275	1,468

PRODUCTION VOLUME BY LINE IN 1995

LINE	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
1	979,396	618,202	856,834	885,238	755,680	1,066,851	611,896	622,409	602,145	677,276	578,692	421834
2	652,602	436,621	616,491	226,860	534,453	437,497	183,551	256,127	704,322	580,765	436,860	466,600
3	1,555,807	1,534,540	1,680,534	915,477	923,438	848,145	1,147,383	1,254,350	1,389,271	1,031,679	1,256,296	1,082,693
4	470,415	488,227	539,604	548,412	402,933	331,813	293,579	257,882	446,962		39,984	711,960
5	588,296	374,963	665,474	474,167	276,220	456,431	417,226	212,076	595,756	524,260	398,236	227,266
6	289,034	257,464	196,075	263,770	182,559	277,871	220,932	226,228	298,275	147,045	51,322	167,013
7	787,506	843,555	819,947	833,853	866,314	757,014	592,068	446,381	914,513	666,807	698,109	735,156
8	450,532	822,344	734,796	665,380	496,560	822,214	479,168	330,277	535,690	729,273	523,675	568,192
	5,773,588	5,375,916	6,109,755	4,813,157	4,438,157	4,997,836	3,945,803	3,605,730	5,486,934	4,357,105	3,983,174	4,380,714

57,267,869 TOTAL

J.L. CLARK
a CLARCOR Company

DATE: July 24, 1996

TO: JIM KLOTZ

FROM: BILL PRUYNE

COPIES TO: J. BENTON

SUBJECT: 1995 TUBE DIVISION ALUMINUM CONSUMPTION

IN 1995, THE TUBE DIVISION CONSUMED 855,731 LBS OF ALUMINUM. THIS FIGURE DOES NOT TAKE INTO ACCOUNT ANY SCRAP SALES.

Form Approved OMB Number: 2070-0092
Approval Expires: 11/92

(IMPORTANT: Type or print; read instructions before completing form)

EPA

United States Environmental Protection Agency

FORM R

TOXIC CHEMICAL RELEASE INVENTORY REPORTING FORM

Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986, also known as Title III of the Superfund Amendments and Reauthorization Act

TRI FACILITY ID NUMBER: 60515JLCLR2300W

Chem., Cat., or Gen. Name: GLYCOL ETHERS

WHERE TO SEND COMPLETED FORMS:

1. EPCRA Reporting Center
P.O. Box 3348
Merrifield, VA 22116-3348
ATTN: TOXIC CHEMICAL RELEASE INVENTORY

2. APPROPRIATE STATE OFFICE
(See instructions in Appendix F)

Enter "X" here if this is a revision

IMPORTANT: See instructions to determine when "Not Applicable (NA)" boxes should be checked.

For EPA use only

PART I. FACILITY IDENTIFICATION INFORMATION

SECTION 1. REPORTING YEAR: 1995

Section 2. TRADE SECRET INFORMATION

2.1 Are you claiming the toxic chemical identified on page 3 trade secret?
[ ] Yes (Answer question 2.2; Attach substantiation forms)
[X] No (Do not answer 2.2; Go to Section 3)

2.2 If yes in 2.1, is this copy: [ ] Sanitized [ ] Unsanitized

SECTION 3. CERTIFICATION (Important: Read and sign after completing all form sections.)

I hearby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data available to the preparers of this report.

Name and official title of owner/operator or senior management official
GORDON E. VERWEYST, VICE PRESIDENT TECHNOLOGY

Signature

Date Signed: 08/06/96

SECTION 4. FACILITY IDENTIFICATION

4.1

Facility or Establishment Name: J. L. CLARK - TUBE DIVISION

TRI Facility ID Number: 60515JLCLR2300W

Street Address: 2300 WISCONSIN AVENUE

City: DOWNERS GROVE

County: DU PAGE

State: IL

Zip Code: 60515-

Mailing Address (if different from street address): NA

City

State

Zip Code

PUT LABEL HERE

EPA United States Environmental Protection Agency	EPA FORM R PART I. FACILITY IDENTIFICATION INFORMATION (CONTINUED)	TRI FACILITY ID NUMBER 60515JLCLR2300W Chem., Cat., or Gen. Name GLYCOL ETHERS

SECTION 4. FACILITY IDENTIFICATION (Continued)

4.2	This report contains information for: (Important: check only one)	a. [X] An entire facility b. [ ] Part of a facility c. [ ] Federal Facility
4.3	Technical Contact	Name: JAMES K. KLOTZ; Telephone Number (include area code): (815)961-5686
4.4	Public Contact	Name: DAVID J. LINDSAY; Telephone Number (include area code): (815)962-8867

4.5	SIC Code (4-digit)	a. 3499	b. NA	c.	d.	e.	f.

		Latitude			Longitude		
4.6	Latitude and Longitude	Degrees	Minutes	Seconds	Degrees	Minutes	Seconds
		041	47	28	088	02	27

4.7	Dun & Bradstreet Number(s) (9 digits)	a.	005130000
		b.	NA
4.8	EPA Identification Number(s) (RCRA I.D. No.) (12 characters)	a.	ILD005130000
		b.	NA
4.9	Facility NPDES Permit Number(s) (9 characters)	a.	NA
		b.	
4.10	Underground Injection Well Code (UIC) I.D. Number(s) (12 digits)	a.	NA
		b.	

SECTION 5. PARENT COMPANY INFORMATION

5.1	Name of Parent Company	[ ] NA: CLARCOR, INC.
5.2	Parent Company's Dun & Bradstreet Number	[ ] NA: (9 Digits) 005162417

EPA United States Environmental Protection Agency	EPA FORM R PART II. CHEMICAL-SPECIFIC INFORMATION	TRI FACILITY ID NUMBER 60515JLCLR2300W Chem., Cat., or Gen. Name GLYCOL ETHERS

SECTION 1. TOXIC CHEMICAL IDENTITY (Important: DO NOT complete this section if you complete Section 2 below.)

1.1 CAS Number (Important: Enter only one number exactly as it appears on the Section 313 list.

N230 - -

1.2 Toxic Chemical or Chemical Category Name (Important: Enter only one name exactly as it appears on the Section 313 list.)

GLYCOL ETHERS

1.3 Generic Chemical Name (Important: Complete only if Part 1, Section 2.1 is checked "yes."

NA

SECTION 2. MIXTURE COMPONENT IDENTITY (Important: DO NOT complete this section if you complete Section 1 above.)

2.1 Generic Chemical Name Provided by Supplier (Important: Max. of 70 chars., including numbers, letters, spaces, and punct.)

NA

SECTION 3. ACTIVITIES AND USES OF THE CHEMICAL AT THE FACILITY (Important: Check all that apply.)

3.1	Manufacture the toxic chemical:	a. [ ] Produce b. [ ] Import	If produce or import: c. [ ] For on-site use/processing d. [ ] For sale/distribution e. [ ] As a byproduct f. [ ] As an impurity
3.2	Process the toxic chemical	a. [ ] As a reactant b. [ ] As a formulation component	c. [ ] As an article component d. [ ] Repackaging
3.3	Otherwise use the toxic chemical:	a. [X] As a chemical processing aid b. [ ] As a manufacturing aid	c. [X] Ancillary or other use

Section 4. MAXIMUM AMOUNT OF THE TOXIC CHEMICAL ON-SITE AT ANY TIME DURING THE CALENDAR YEAR

4.1 03 (Enter two-digit code from instruction package.)

EPA United States Environmental Protection Agency	EPA FORM R PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)	TRI FACILITY ID NUMBER 60515JLCLR2300W Chem., Cat., or Gen. Name GLYCOL ETHERS

SECTION 5. RELEASES OF THE TOXIC CHEMICAL TO THE ENVIRONMENT ON-SITE

			A. Total Release (pounds/year) (enter range code from instructions or estimate)	B. Basis of Estimate (enter code)	C. % from Stormwater
5.1	Fugitive or non-point air emissions	[ ]NA	486	O	
5.2	Stack or point air emissions	[ ]NA	5488	C	
5.3	Discharges to receiving streams or water bodies (enter one name per box)				
5.3.1	Stream or Water Body Name NA				
5.3.2	Stream or Water Body Name				
5.3.3	Stream or Water Body Name				
5.4	Underground injections on-site	[X]NA	NA		
5.5	Releases to land on-site				
5.5.1	Landfill	[X]NA	NA		
5.5.2	Land treatment/ application farming	[X]NA	NA		
5.5.3	Surface impoundment	[X]NA	NA		
5.5.4	Other disposal	[X]NA	NA		

[ ] Check here only if additional Section 5.3 information is provided on page 5 of this form.

Range Codes: A = 1-10 pounds; B = 11-499 pounds; C = 500 - 999 pounds.

EPA United States Environmental Protection Agency	EPA FORM R PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)	TRI FACILITY ID NUMBER 60515JLCLR2300W Chem., Cat., or Gen. Name GLYCOL ETHERS

Section 5.3 ADDITIONAL INFORMATION ON RELEASES OF THE TOXIC CHEMICAL TO THE ENVIRONMENT ON-SITE

5.3 Discharges to receiving streams or water bodies (enter one name per box)	A. Total Release (pounds/year) (enter range code from instructions or estimate)	B. Basis of Estimate (enter code)	C. % From Stormwater
5.3.4 Stream or Water Body Name			
5.3.5 Stream or Water Body Name			
5.3.6 Stream or Water Body Name			

SECTION 6. TRANSFERS OF THE TOXIC CHEMICAL IN WASTES TO OFF-SITE LOCATIONS

6.1 DISCHARGES TO PUBLICLY OWNED TREATMENT WORKS (POTW)

6.1.A Total Quantity Transferred to POTWs and Basis of Estimate

6.1.A.1 Total Transfers (pounds/year) (enter range code or estimate)	6.1.A.2 Basis of Estimate (enter code)
NA	

6.1.B POTW Name and Location Information

6.1.B.1 POTW Name		6.1.B.2 POTW Name	
Street Address		Street Address	
City	County	City	County
State	Zip Code	State	Zip Code

If additional pages of Part II, Sections 5.3 and/or 6.1 are attached, indicate the total number of pages in this box [ ] and indicate which Part II, Sections 5.3/6.1 page this is, here. [1] (example: 1,2,3,etc.),

Range Codes: A = 1-10 pounds; B = 11-499 pounds; C = 500 - 999 pounds.

EPA United States Environmental Protection Agency	EPA FORM R PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)	TRI FACILITY ID NUMBER 60515JLCLR2300W Chem., Cat., or Gen. Name GLYCOL ETHERS

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS

6.2.1 Off-site EPA Identification Number (RCRA ID No.)
WID990829475

Off-Site Location Name WASTE RESEARCH AND RECLAMATION CO., INC.

Street Address 5200 STATE ROAD 93

City	County
EAU CLAIRE	EAU CLAIRE

State WI	Zip Code 54701-	Is location under control of reporting [ ] YES [X] NO

A. Total Transfers (pounds/year) (enter range code or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)
1. 117	1. O	1. M20
2. NA	2.	2.
3.	3.	3.
4.	4.	4.

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS

6.2.2 Off-site EPA Identification Number (RCRA ID No.)
NA

Off-Site Location Name

Street Address

City	County

State	Zip Code	Is location under control of reporting [ ] YES [ ] NO

A. Total Transfers (pounds/year) (enter range code or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)
1.	1.	1.
2.	2.	2.
3.	3.	3.
4.	4.	4.

If additional pages of Part II, Section 6.2 are attached, indicate the total number of pages in this box [ ] and indicate which Part II, Sections 6.2 page this is, here. [1]
(example: 1,2,3,etc.)

Range Codes: A = 1-10 pounds; B = 11-499 pounds; C = 500 - 999 pounds.

EPA

United States Environmental Protection Agency

EPA FORM R

PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER: 60515JLCLR2300W

Chem., Cat., or Gen. Name: GLYCOL ETHERS

Section 7A. ON-SITE WASTE TREATMENT METHODS AND EFFICIENCY

[ ] Not Applicable (NA) - Check here if no on-site treatment is applied to any waste stream containing the toxic chemical or chemical category.

a. General Waste Stream (enter code)	b. Waste Treatment Method(s) Sequence [enter 3-character code(s)]	c. Range of Influent Concentration	d. Treatment Efficiency Estimate	e. Based on Operating Data?
7A.1a	7A.1b	7A.1c	7A.1d	7A.1e
A	1 F71; 2 NA; 3; 4; 5; 6; 7; 8	4	095.00 %	Yes [ ] No [X]
7A.2a	7A.2b	7A.2c	7A.2d	7A.2e
NA	1; 2; 3; 4; 5; 6; 7; 8		%	Yes [ ] No [ ]
7A.3a	7A.3b	7A.3c	7A.3d	7A.3e
	1; 2; 3; 4; 5; 6; 7; 8		%	Yes [ ] No [ ]
7A.4a	7A.4b	7A.4c	7A.4d	7A.4e
	1; 2; 3; 4; 5; 6; 7; 8		%	Yes [ ] No [ ]
7A.5a	7A.5b	7A.5c	7A.5d	7A.5e
	1; 2; 3; 4; 5; 6; 7; 8		%	Yes [ ] No [ ]

If additional pages are attached, indicate the total number of pages in this box [ ] and indicate which page this is, here [1].

EPA United States Environmental Protection Agency	EPA FORM R PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)	TRI FACILITY ID NUMBER 60515JLCLR2300W Chem., Cat., or Gen. Name GLYCOL ETHERS

Section 7B. ON-SITE ENERGY RECOVERY PROCESSES

[X] Not Applicable (NA) - Check here if no on-site energy recovery is applied to any waste stream containing the toxic chemical or chemical category.

Energy Recovery Methods [enter 3-character code(s)]

1	2	3	4
NA			

Section 7C. ON-SITE RECYCLING PROCESSES

[X] Not Applicable (NA) - Check here if no on-site recycling is applied to any waste stream containing the toxic chemical or chemical category.

Recycling Methods [enter 3-character code(s)]

1	2	3	4	5
NA				

6	7	8	9	10

EPA United States Environmental Protection Agency	EPA FORM R PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)	TRI FACILITY ID NUMBER 60515JLCLR2300W Chem., Cat., or Gen. Name GLYCOL ETHERS

Section 8. SOURCE REDUCTION AND RECYCLING ACTIVITIES

	All estimates can be reported using up to two significant figures.	Column A 1994 (pounds/year)	Column B 1995 (pounds/year)	Column C 1996 (pounds/year)	Column D 1997 (pounds/year)
8.1	Quantity released *	2827	5488	5762	6050
8.2	Quantity used for energy recovery on-site	0	0	0	0
8.3	Quantity used for energy recovery off-site	0	0	0	0
8.4	Quantity recycled on-site	0	0	0	0
8.5	Quantity recycled off-site	60	117	123	129
8.6	Quantity treated on-site	0	0	0	0
8.7	Quantity treated off-site	0	0	0	0
8.8	Quantity released to the environment as a result of remedial actions, catastrophic events, or one-time events not associated with production processes (pounds/year)				0
8.9	Production Ratio or Activity Index				0000.88

8.10 Did your facility engage in any source reduction activities for this chemical during the reporting year? If not, enter "NA" in Section 8.10.1 and answer Section 8.11.

	Source Reduction Activities [enter code(s)]	Methods to Identify Activity (enter codes)		
8.10.1	NA	a.	b.	c.
8.10.2		a.	b.	c.
8.10.3		a.	b.	c.
8.10.4		a.	b.	c.

8.11 Is additional optional information on source reduction, recycling, or pollution control activities included with this report? (Check one box) YES [ ] NO [X]

* Report releases pursuant to EPRCA Section 329(8) including "any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment." Do not include any quantity treated on-site or off-site.

Form Approved OMB Number: 2070-0092
Approval Expires: 11/92

(IMPORTANT: Type or print; read instructions before completing form)

EPA

United States Environmental Protection Agency

FORM R

TOXIC CHEMICAL RELEASE INVENTORY REPORTING FORM

Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986, also known as Title III of the Superfund Amendments and Reauthorization Act

TRI FACILITY ID NUMBER: 60515JLCLR2300W

Chem., Cat., or Gen. Name: METHYL ETHYL KETONE

WHERE TO SEND COMPLETED FORMS:

1. EPCRA Reporting Center
P.O. Box 3348
Merrifield, VA 22116-3348
ATTN: TOXIC CHEMICAL RELEASE INVENTORY

2. APPROPRIATE STATE OFFICE
(See instructions in Appendix F)

Enter "X" here if this is a revision

For EPA use only

IMPORTANT: See instructions to determine when "Not Applicable (NA)" boxes should be checked.

PART I. FACILITY IDENTIFICATION INFORMATION

SECTION 1. REPORTING YEAR: 1995

Section 2. TRADE SECRET INFORMATION

2.1 Are you claiming the toxic chemical identified on page 3 trade secret?
[ ] Yes (Answer question 2.2; Attach substantiation forms)
[X] No (Do not answer 2.2; Go to Section 3)

2.2 If yes in 2.1, is this copy: [ ] Sanitized [ ] Unsanitized

SECTION 3. CERTIFICATION (Important: Read and sign after completing all form sections.)

I hearby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data available to the preparers of this report.

Name and official title of owner/operator or senior management official
GORDON E. VERWEYST, VICE PRESIDENT TECHNOLOGY

Signature

Date Signed: 08/06/96

SECTION 4. FACILITY IDENTIFICATION

4.1

Facility or Establishment Name: J. L. CLARK - TUBE DIVISION

TRI Facility ID Number: 60515JLCLR2300W

Street Address: 2300 WISCONSIN AVENUE

City: DOWNERS GROVE

County: DU PAGE

State: IL

Zip Code: 60515-

Mailing Address (if different from street address): NA

City

State

Zip Code

PUT LABEL HERE

EPA United States Environmental Protection Agency	EPA FORM R PART I. FACILITY IDENTIFICATION INFORMATION (CONTINUED)	TRI FACILITY ID NUMBER: 60515JLCLR2300W Chem., Cat., or Gen. Name: METHYL ETHYL KETONE

SECTION 4. FACILITY IDENTIFICATION (Continued)

4.2	This report contains information for: (Important: check only one)	a. [X] An entire facility b. [ ] Part of a facility c. [ ] Federal Facility
4.3	Technical Contact	Name: JAMES K. KLOTZ Telephone Number (include area code): (815)961-5686
4.4	Public Contact	Name: DAVID J. LINDSAY Telephone Number (include area code): (815)962-8867

4.5	SIC Code (4-digit)	a. 3499	b. NA	c.	d.	e.	f.

4.6	Latitude and Longitude	Latitude			Longitude		
		Degrees	Minutes	Seconds	Degrees	Minutes	Seconds
		041	47	28	088	02	27

4.7	Dun & Bradstreet Number(s) (9 digits)	a.	005130000
		b.	NA
4.8	EPA Identification Number(s) (RCRA I.D. No.) (12 characters)	a.	ILD005130000
		b.	NA
4.9	Facility NPDES Permit Number(s) (9 characters)	a.	NA
		b.	
4.10	Underground Injection Well Code (UIC) I.D. Number(s) (12 digits)	a.	NA
		b.	

SECTION 5. PARENT COMPANY INFORMATION

5.1	Name of Parent Company	[ ] NA: CLARCOR, INC.
5.2	Parent Company's Dun & Bradstreet Number	[ ] NA: (9 Digits) 005162417

EPA United States Environmental Protection Agency	EPA FORM R PART II. CHEMICAL-SPECIFIC INFORMATION	TRI FACILITY ID NUMBER 60515JLCLR2300W Chem., Cat., or Gen. Name METHYL ETHYL KETONE

SECTION 1. TOXIC CHEMICAL IDENTITY (Important: DO NOT complete this section if you complete Section 2 below.)

1.1 CAS Number (Important: Enter only one number exactly as it appears on the Section 313 list.

000078-93-3

1.2 Toxic Chemical or Chemical Category Name (Important: Enter only one name exactly as it appears on the Section 313 list.)

METHYL ETHYL KETONE

1.3 Generic Chemical Name (Important: Complete only if Part I, Section 2.1 is checked "yes."

NA

SECTION 2. MIXTURE COMPONENT IDENTITY (Important: DO NOT complete this section if you complete Section 1 above.)

2.1 Generic Chemical Name Provided by Supplier (Important: Max. of 70 chars., including numbers, letters, spaces, and punct.)

NA

SECTION 3. ACTIVITIES AND USES OF THE CHEMICAL AT THE FACILITY (Important: Check all that apply.)

			If produce or import:
3.1	Manufacture the toxic chemical:	a. [ ] Produce b. [ ] Import	c. [ ] For on-site use/processing d. [ ] For sale/distribution e. [ ] As a byproduct f. [ ] As an impurity
3.2	Process the toxic chemical	a. [ ] As a reactant b. [ ] As a formulation component	c. [ ] As an article component d. [ ] Repackaging
3.3	Otherwise use the toxic chemical:	a. [X] As a chemical processing aid b. [ ] As a manufacturing aid	c. [X] Ancillary or other use

Section 4. MAXIMUM AMOUNT OF THE TOXIC CHEMICAL ON-SITE AT ANY TIME DURING THE CALENDAR YEAR

4.1 03 (Enter two-digit code from instruction package.)

EPA United States Environmental Protection Agency	EPA FORM R PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)	TRI FACILITY ID NUMBER 60515JLCLR2300W Chem., Cat., or Gen. Name METHYL ETHYL KETONE

SECTION 5. RELEASES OF THE TOXIC CHEMICAL TO THE ENVIRONMENT ON-SITE

			A. Total Release (pounds/year) (enter range code from instructions or estimate)	B. Basis of Estimate (enter code)	C. % From Stormwater
5.1	Fugitive or non-point air emissions	[ ]NA	413	O	
5.2	Stack or point air emissions	[ ]NA	4585	C	
5.3	Discharges to receiving streams or water bodies (enter one name per box)				
5.3.1 Stream or Water Body Name					
NA					
5.3.2 Stream or Water Body Name					
5.3.3 Stream or Water Body Name					
5.4	Underground injections on-site	[X]NA	NA		
5.5	Releases to land on-site				
5.5.1	Landfill	[X]NA	NA		
5.5.2	Land treatment/ application farming	[X]NA	NA		
5.5.3	Surface impoundment	[X]NA	NA		
5.5.4	Other disposal	[X]NA	NA		

[ ] Check here only if additional Section 5.3 information is provided on page 5 of this form.

Range Codes: A = 1-10 pounds; B = 11-499 pounds; C = 500 - 999 pounds.

EPA United States Environmental Protection Agency	EPA FORM R PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)	TRI FACILITY ID NUMBER 60515JLCLR2300W Chem., Cat., or Gen. Name METHYL ETHYL KETONE

Section 5.3 ADDITIONAL INFORMATION ON RELEASES OF THE TOXIC CHEMICAL TO THE ENVIRONMENT ON-SITE

5.3	Discharges to receiving streams or water bodies (enter one name per box)	A. Total Release (pounds/year) (enter range code from instructions or estimate)	B. Basis of Estimate (enter code)	C. % From Stormwater
5.3.4	Stream or Water Body Name			
5.3.5	Stream or Water Body Name			
5.3.6	Stream or Water Body Name			

SECTION 6. TRANSFERS OF THE TOXIC CHEMICAL IN WASTES TO OFF-SITE LOCATIONS

6.1 DISCHARGES TO PUBLICLY OWNED TREATMENT WORKS (POTW)

6.1.A Total Quantity Transferred to POTWs and Basis of Estimate

6.1.A.1 Total Transfers (pounds/year) (enter range code or estimate)	6.1.A.2 Basis of Estimate (enter code)
NA	

6.1.B POTW Name and Location Information

6.1.B.1 POTW Name		6.1.B.2 POTW Name	
Street Address		Street Address	
City	County	City	County
State	Zip Code	State	Zip Code

If additional pages of Part II, Sections 5.3 and/or 6.1 are attached, indicate the total number of pages in this box [ ] and indicate which Part II, Sections 5.3/6.1 page this is, here. [1]
(example: 1,2,3,etc.)

Range Codes: A = 1-10 pounds; B = 11-499 pounds; C = 500 - 999 pounds.

EPA	EPA FORM R	TRI FACILITY ID NUMBER
United States Environmental Protection Agency	PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)	60515JLCLR2300W
		Chem., Cat., or Gen. Name
		METHYL ETHYL KETONE

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS

6.2.1 Off-site EPA Identification Number (RCRA ID No.)
WID990829475

Off-Site Location Name WASTE RESEARCH AND RECLAMATION CO., INC.

Street Address 5200 STATE ROAD 93

City
EAU CLAIRE

County
EAU CLAIRE

State WI | Zip Code 54701- | Is location under control of reporting [ ] YES [X] NO

A. Total Transfers (pounds/year) (enter range code or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)
1. 268	1. O	1. M20
2. NA	2.	2.
3.	3.	3.
4.	4.	4.

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS

6.2.2 Off-site EPA Identification Number (RCRA ID No.)
NA

Off-Site Location Name

Street Address

City

County

State | Zip Code | Is location under control of reporting [ ] YES [ ] NO

A. Total Transfers (pounds/year) (enter range code or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)
1.	1.	1.
2.	2.	2.
3.	3.	3.
4.	4.	4.

If additional pages of Part II, Section 6.2 are attached, indicate the total number of pages in this box [ ] and indicate which Part II, Sections 6.2 page this is, here. [1]
(example: 1,2,3,etc.)

Range Codes: A = 1-10 pounds; B = 11-499 pounds; C = 500 - 999 pounds.

EPA	EPA FORM R	TRI FACILITY ID NUMBER
United States Environmental Protection Agency	PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)	60515JLCLR2300W
		Chem., Cat., or Gen. Name
		METHYL ETHYL KETONE

Section 7A. ON-SITE WASTE TREATMENT METHODS AND EFFICIENCY

[ ] Not Applicable (NA) - Check here if no on-site treatment is applied to any waste stream containing the toxic chemical or chemical category.

a. General Waste Stream (enter code)	b. Waste Treatment Method(s) Sequence [enter 3-character code(s)]	c. Range of Influent Concentration	d. Treatment Efficiency Estimate	e. Based on Operating Data?
7A.1a	7A.1b	7A.1c	7A.1d	7A.1e
A	1 F71 2 NA 3 4 5 6 7 8	3	095.00 %	Yes [ ] No [X]
7A.2a	7A.2b	7A.2c	7A.2d	7A.2e
NA	1 2 3 4 5 6 7 8		%	Yes [ ] No [ ]
7A.3a	7A.3b	7A.3c	7A.3d	7A.3e
	1 2 3 4 5 6 7 8		%	Yes [ ] No [ ]
7A.4a	7A.4b	7A.4c	7A.4d	7A.4e
	1 2 3 4 5 6 7 8		%	Yes [ ] No [ ]
7A.5a	7A.5b	7A.5c	7A.5d	7A.5e
	1 2 3 4 5 6 7 8		%	Yes [ ] No [ ]

If additional pages are attached, indicate the total number of pages in this box [ ] and indicate which page this is, here [1].

EPA United States Environmental Protection Agency	EPA FORM R PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)	TRI FACILITY ID NUMBER 60515JLCLR2300W Chem., Cat., or Gen. Name METHYL ETHYL KETONE

Section 7B. ON-SITE ENERGY RECOVERY PROCESSES

[X] Not Applicable (NA) - Check here if no on-site energy recovery is applied to any waste stream containing the toxic chemical or chemical category.

Energy Recovery Methods [enter 3-character code(s)]

1	2	3	4
NA			

Section 7C. ON-SITE RECYCLING PROCESSES

[X] Not Applicable (NA) - Check here if no on-site recycling is applied to any waste stream containing the toxic chemical or chemical category.

Recycling Methods [enter 3-character code(s)]

1	2	3	4	5
NA				
6	**7**	**8**	**9**	**10**

EPA	EPA FORM R	TRI FACILITY ID NUMBER
United States Environmental Protection Agency	PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)	60515JLCLR2300W
		Chem., Cat., or Gen. Name
		METHYL ETHYL KETONE

Section 8. SOURCE REDUCTION AND RECYCLING ACTIVITIES

	All estimates can be reported using up to two significant figures.	Column A 1994 (pounds/year)	Column B 1995 (pounds/year)	Column C 1996 (pounds/year)	Column D 1997 (pounds/year)
8.1	Quantity released *	5817	4585	4814	5055
8.2	Quantity used for energy recovery on-site	0	0	0	0
8.3	Quantity used for energy recovery off-site	0	0	0	0
8.4	Quantity recycled on-site	0	0	0	0
8.5	Quantity recycled off-site	232	268	281	295
8.6	Quantity treated on-site	0	0	0	0
8.7	Quantity treated off-site	0	0	0	0
8.8	Quantity released to the environment as a result of remedial actions, catastrophic events, or one-time events not associated with production processes (pounds/year)				0
8.9	Production Ratio or Activity Index				0000.88

8.10 Did your facility engage in any source reduction activities for this chemical during the reporting year? If not, enter "NA" In Section 8.10.1 and answer Section 8.11.

	Source Reduction Activities [enter code(s)]	Methods to Identify Activity (enter codes)		
8.10.1	NA	a.	b.	c.
8.10.2		a.	b.	c.
8.10.3		a.	b.	c.
8.10.4		a.	b.	c.

		YES	NO
8.11	Is additional optional information on source reduction, recycling, or pollution control activities included with this report? (Check one box)	[ ]	[X]

* Report releases pursuant to EPRCA Section 329(8) including "any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment." Do not include any quantity treated on-site or off-site.

Form Approved OMB Number: 2070-0092
Approval Expires: 11/92

(IMPORTANT: Type or print; read instructions before completing form)

EPA

United States Environmental Protection Agency

FORM R

TOXIC CHEMICAL RELEASE INVENTORY REPORTING FORM

Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986, also known as Title III of the Superfund Amendments and Reauthorization Act

TRI FACILITY ID NUMBER: 60515JLCLR2300W

Chem., Cat., or Gen. Name: TOLUENE

WHERE TO SEND COMPLETED FORMS:
1. EPCRA Reporting Center
P.O. Box 3348
Merrifield, VA 22116-3348
ATTN: TOXIC CHEMICAL RELEASE INVENTORY

2. APPROPRIATE STATE OFFICE
(See instructions in Appendix F)

Enter "X" here if this is a revision

IMPORTANT: See instructions to determine when "Not Applicable (NA)" boxes should be checked.

For EPA use only

PART I. FACILITY IDENTIFICATION INFORMATION

SECTION 1. REPORTING YEAR: 1995

Section 2. TRADE SECRET INFORMATION

2.1 Are you claiming the toxic chemical identified on page 3 trade secret?
[ ] Yes (Answer question 2.2; Attach substantiation forms)
[X] No (Do not answer 2.2; Go to Section 3)

2.2 If yes in 2.1, is this copy: [ ] Sanitized [ ] Unsanitized

SECTION 3. CERTIFICATION (Important: Read and sign after completing all form sections.)

I hearby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data available to the preparers of this report.

Name and official title of owner/operator or senior management official
GORDON E. VERWEYST, VICE PRESIDENT TECHNOLOGY

Signature

Date Signed: 08/06/96

SECTION 4. FACILITY IDENTIFICATION

4.1

Facility or Establishment Name: J. L. CLARK - TUBE DIVISION

TRI Facility ID Number: 60515JLCLR2300W

Street Address: 2300 WISCONSIN AVENUE

City: DOWNERS GROVE

County: DU PAGE

State: IL

Zip Code: 60515-

Mailing Address (if different from street address): NA

City

State

Zip Code

PUT LABEL HERE

EPA United States Environmental Protection Agency	EPA FORM R PART I. FACILITY IDENTIFICATION INFORMATION (CONTINUED)	TRI FACILITY ID NUMBER 60515JLCLR2300W Chem., Cat., or Gen. Name TOLUENE

SECTION 4. FACILITY IDENTIFICATION (Continued)

4.2	This report contains information for: (Important: check only one)	a. [X] An entire facility b. [ ] Part of a facility c. [ ] Federal Facility
4.3	Technical Contact	Name: JAMES K. KLOTZ Telephone Number (include area code): (815)961-5686
4.4	Public Contact	Name: DAVID J. LINDSAY Telephone Number (include area code): (815)962-8867

4.5	SIC Code (4-digit)	a. 3499	b. NA	c.	d.	e.	f.

4.6	Latitude and Longitude	Latitude			Longitude		
		Degrees	Minutes	Seconds	Degrees	Minutes	Seconds
		041	47	28	088	02	27

4.7	Dun & Bradstreet Number(s) (9 digits)	a.	005130000
		b.	NA
4.8	EPA Identification Number(s) (RCRA I.D. No.) (12 characters)	a.	ILD005130000
		b.	NA
4.9	Facility NPDES Permit Number(s) (9 characters)	a.	NA
		b.	
4.10	Underground Injection Well Code (UIC) I.D. Number(s) (12 digits)	a.	NA
		b.	

SECTION 5. PARENT COMPANY INFORMATION

5.1	Name of Parent Company	
	[ ] NA	CLARCOR, INC.
5.2	Parent Company's Dun & Bradstreet Number	
	[ ] NA	(9 Digits) 005162417

EPA United States Environmental Protection Agency	EPA FORM R PART II. CHEMICAL-SPECIFIC INFORMATION	TRI FACILITY ID NUMBER 60515JLCLR2300W Chem., Cat., or Gen. Name TOLUENE

SECTION 1. TOXIC CHEMICAL IDENTITY (Important: DO NOT complete this section if you complete Section 2 below.)

1.1 CAS Number (Important: Enter only one number exactly as it appears on the Section 313 list.

000108-88-3

1.2 Toxic Chemical or Chemical Category Name (Important: Enter only one name exactly as it appears on the Section 313 list.)

TOLUENE

1.3 Generic Chemical Name (Important: Complete only if Part I, Section 2.1 is checked "yes."

NA

SECTION 2. MIXTURE COMPONENT IDENTITY (Important: DO NOT complete this section if you complete Section 1 above.)

2.1 Generic Chemical Name Provided by Supplier (Important: Max. of 70 chars., including numbers, letters, spaces, and punct.)

NA

SECTION 3. ACTIVITIES AND USES OF THE CHEMICAL AT THE FACILITY (Important: Check all that apply.)

3.1	Manufacture the toxic chemical:	a. [ ] Produce b. [ ] Import	If produce or import: c. [ ] For on-site use/processing d. [ ] For sale/distribution e. [ ] As a byproduct f. [ ] As an impurity
3.2	Process the toxic chemical	a. [ ] As a reactant b. [ ] As a formulation component	c. [ ] As an article component d. [ ] Repackaging
3.3	Otherwise use the toxic chemical:	a. [X] As a chemical processing aid b. [ ] As a manufacturing aid	c. [X] Ancillary or other use

Section 4. MAXIMUM AMOUNT OF THE TOXIC CHEMICAL ON-SITE AT ANY TIME DURING THE CALENDAR YEAR

4.1 03 (Enter two-digit code from instruction package.)

EPA United States Environmental Protection Agency	EPA FORM R PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)	TRI FACILITY ID NUMBER 60515JLCLR2300W Chem., Cat., or Gen. Name TOLUENE

SECTION 5. RELEASES OF THE TOXIC CHEMICAL TO THE ENVIRONMENT ON-SITE

			A. Total Release (pounds/year) (enter range code from instructions or estimate)	B. Basis of Estimate (enter code)	C. % From Stormwater
5.1	Fugitive or non-point air emissions	[ ]NA	515	O	
5.2	Stack or point air emissions	[ ]NA	4690	C	
5.3	Discharges to receiving streams or water bodies (enter one name per box)				
5.3.1	Stream or Water Body Name NA				
5.3.2	Stream or Water Body Name				
5.3.3	Stream or Water Body Name				
5.4	Underground injections on-site	[X]NA	NA		
5.5	Releases to land on-site				
5.5.1	Landfill	[X]NA	NA		
5.5.2	Land treatment/ application farming	[X]NA	NA		
5.5.3	Surface impoundment	[X]NA	NA		
5.5.4	Other disposal	[X]NA	NA		

[ ] Check here only if additional Section 5.3 information is provided on page 5 of this form.

Range Codes: A = 1-10 pounds; B = 11-499 pounds; C = 500 - 999 pounds.

EPA United States Environmental Protection Agency	EPA FORM R PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)	TRI FACILITY ID NUMBER 60515JLCLR2300W Chem., Cat., or Gen. Name TOLUENE

Section 5.3 ADDITIONAL INFORMATION ON RELEASES OF THE TOXIC CHEMICAL TO THE ENVIRONMENT ON-SITE

5.3 Discharges to receiving streams or water bodies (enter one name per box)	A. Total Release (pounds/year) (enter range code from instructions or estimate)	B. Basis of Estimate (enter code)	C. % From Stormwater
5.3.4 Stream or Water Body Name			
5.3.5 Stream or Water Body Name			
5.3.6 Stream or Water Body Name			

SECTION 6. TRANSFERS OF THE TOXIC CHEMICAL IN WASTES TO OFF-SITE LOCATIONS

6.1 DISCHARGES TO PUBLICLY OWNED TREATMENT WORKS (POTW)

6.1.A Total Quantity Transferred to POTWs and Basis of Estimate

6.1.A.1 Total Transfers (pounds/year) (enter range code or estimate)	6.1.A.2 Basis of Estimate (enter code)
NA	

6.1.B POTW Name and Location Information

6.1.B.1 POTW Name		6.1.B.2 POTW Name	
Street Address		Street Address	
City	County	City	County
State	Zip Code	State	Zip Code

If additional pages of Part II, Sections 5.3 and/or 6.1 are attached, indicate the total number of pages in this box [ ] and indicate which Part II, Sections 5.3/6.1 page this is, here. [1] (example: 1,2,3,etc.)

Range Codes: A = 1-10 pounds; B = 11-499 pounds; C = 500 - 999 pounds.

EPA United States Environmental Protection Agency	EPA FORM R PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)	TRI FACILITY ID NUMBER 60515JLCLR2300W Chem., Cat., or Gen. Name TOLUENE

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS

6.2.1 Off-site EPA Identification Number (RCRA ID No.)
WID990829475

Off-Site Location Name WASTE RESEARCH AND RECLAMATION ., INC.

Street Address 5200 STATE ROAD 93

City	County
EAU CLAIRE	EAU CLAIRE

State WI	Zip Code 57401-	Is location under control of reporting [ ] YES [X] NO

A. Total Transfers (pounds/year) (enter range code or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)
1. 6693	1. O	1. M20
2. NA	2.	2.
3.	3.	3.
4.	4.	4.

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS

6.2.2 Off-site EPA Identification Number (RCRA ID No.)
NA

Off-Site Location Name

Street Address

City	County

State	Zip Code	Is location under control of reporting [ ] YES [ ] NO

A. Total Transfers (pounds/year) (enter range code or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)
1.	1.	1.
2.	2.	2.
3.	3.	3.
4.	4.	4.

If additional pages of Part II, Section 6.2 are attached, indicate the total number of pages in this box [ ] and indicate which Part II, Sections 6.2 page this is, here. [1]
(example: 1,2,3,etc.)

 Range Codes: A = 1-10 pounds; B = 11-499 pounds; C = 500 - 999 pounds.

EPA United States Environmental Protection Agency	EPA FORM R PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)	TRI FACILITY ID NUMBER 60515JLCLR2300W Chem., Cat., or Gen. Name TOLUENE

Section 7A. ON-SITE WASTE TREATMENT METHODS AND EFFICIENCY

[ ] Not Applicable (NA) - Check here if no on-site treatment is applied to any waste stream containing the toxic chemical or chemical category.

a. General Waste Stream (enter code)	b. Waste Treatment Method(s) Sequence [enter 3-character code(s)]	c. Range of Influent Concentration	d. Treatment Efficiency Estimate	e. Based on Operating Data?
7A.1a	7A.1b	7A.1c	7A.1d	7A.1e
A	1 F71 2 NA 3 4 5 6 7 8	4	095.00 %	Yes [ ] No [X]
7A.2a	7A.2b	7A.2c	7A.2d	7A.2e
NA	1 2 3 4 5 6 7 8		. %	Yes [ ] No [ ]
7A.3a	7A.3b	7A.3c	7A.3d	7A.3e
	1 2 3 4 5 6 7 8		%	Yes [ ] No [ ]
7A.4a	7A.4b	7A.4c	7A.4d	7A.4e
	1 2 3 4 5 6 7 8		%	Yes [ ] No [ ]
7A.5a	7A.5b	7A.5c	7A.5d	7A.5e
	1 2 3 4 5 6 7 8		%	Yes [ ] No [ ]

If additional pages are attached, indicate the total number of pages in this box [ ] and indicate which page this is, here (1).

EPA United States Environmental Protection Agency	EPA FORM R PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)	TRI FACILITY ID NUMBER 60515JLCLR2300W Chem., Cat., or Gen. Name TOLUENE

Section 7B. ON-SITE ENERGY RECOVERY PROCESSES

[X] Not Applicable (NA) - Check here if no on-site energy recovery is applied to any waste stream containing the toxic chemical or chemical category.

Energy Recovery Methods [enter 3-character code(s)]

1	2	3	4
NA			

Section 7C. ON-SITE RECYCLING PROCESSES

[X] Not Applicable (NA) - Check here if no on-site recycling is applied to any waste stream containing the toxic chemical or chemical category.

Recycling Methods [enter 3-character code(s)]

1	2	3	4	5
NA				

6	7	8	9	10

EPA United States Environmental Protection Agency	EPA FORM R PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)	TRI FACILITY ID NUMBER 60515JLCLR2300W Chem., Cat., or Gen. Name TOLUENE

Section 8. SOURCE REDUCTION AND RECYCLING ACTIVITIES

	All estimates can be reported using up to two significant figures.	Column A 1994 (pounds/year)	Column B 1995 (pounds/year)	Column C 1996 (pounds/year)	Column D 1997 (pounds/year)
8.1	Quantity released *	7157	4690	4925	5171
8.2	Quantity used for energy recovery on-site	0	0	0	0
8.3	Quantity used for energy recovery off-site	0	0	0	0
8.4	Quantity recycled on-site	0	0	0	0
8.5	Quantity recycled off-site	2835	6693	7028	7379
8.6	Quantity treated on-site	0	0	0	0
8.7	Quantity treated off-site	0	0	0	0
8.8	Quantity released to the environment as a result of remedial actions, catastrophic events, or one-time events not associated with production processes (pounds/year)				0
8.9	Production Ratio or Activity Index				0000.88

8.10 Did your facility engage in any source reduction activities for this chemical during the reporting year? If not, enter "NA" In Section 8.10.1 and answer Section 8.11.

	Source Reduction Activities [enter code(s)]	Methods to Identify Activity (enter codes)		
8.10.1	W19	a. T04	b. T05	c. T10
8.10.2	NA	a.	b.	c.
8.10.3		a.	b.	c.
8.10.4		a.	b.	c.

8.11 Is additional optional information on source reduction, recycling, or pollution control activities included with this report? (Check one box) YES [ ] NO [X]

* Report releases pursuant to EPRCA Section 329(8) including "any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment." Do not include any quantity treated on-site or off-site.

Form Approved OMB Number: 2070-0092
(IMPORTANT: Type or print; read instructions before completing form) Approval Expires: 11/92

EPA United States Environmental Protection Agency	FORM R Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986, also known as Title III of the Superfund Amendments and Reauthorization Act	TOXIC CHEMICAL RELEASE INVENTORY REPORTING FORM

TRI FACILITY ID NUMBER: 60515JLCLR2300W

Chem., Cat., or Gen. Name: ALUMINUM (FUME OR DUST)

WHERE TO SEND COMPLETED FORMS:
1. EPCRA Reporting Center
P.O. Box 3348
Merrifield, VA 22116-3348
ATTN: TOXIC CHEMICAL RELEASE INVENTORY

2. APPROPRIATE STATE OFFICE
(See instructions in Appendix F)

Enter "X" here if this is a revision

IMPORTANT: See instructions to determine when "Not Applicable (NA)" boxes should be checked.

For EPA use only

PART I. FACILITY IDENTIFICATION INFORMATION

SECTION 1. REPORTING YEAR: 1995

Section 2. TRADE SECRET INFORMATION

2.1 Are you claiming the toxic chemical identified on page 3 trade secret?
[ ] Yes (Answer question 2.2; Attach substantiation forms)
[X] No (Do not answer 2.2; Go to Section 3)

2.2 If yes in 2.1, is this copy: [ ] Sanitized [ ] Unsanitized

SECTION 3. CERTIFICATION (Important: Read and sign after completing all form sections.)

I hearby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data available to the preparers of this report.

Name and official title of owner/operator or senior management official
GORDON E. VERWEYST, VICE PRESIDENT TECHNOLOGY

Signature

Date Signed: 08/06/96

SECTION 4. FACILITY IDENTIFICATION

4.1

Facility or Establishment Name: J. L. CLARK - TUBE DIVISION

TRI Facility ID Number: 60515JLCLR2300W

Street Address: 2300 WISCONSIN AVENUE

City: DOWNERS GROVE

County: DU PAGE

State: IL

Zip Code: 60515-

Mailing Address (if different from street address): NA

City

State Zip Code

PUT LABEL HERE

EPA United States Environmental Protection Agency	EPA FORM R PART I. FACILITY IDENTIFICATION INFORMATION (CONTINUED)	TRI FACILITY ID NUMBER 60515JLCLR2300W Chem., Cat., or Gen. Name ALUMINUM (FUME OR DUST)

SECTION 4. FACILITY IDENTIFICATION (Continued)

4.2	This report contains information for: (Important: check only one)	a. [X] An entire facility b. [ ] Part of a facility c. [ ] Federal Facility
4.3	Technical Contact	Name: JAMES K. KLOTZ Telephone Number (include area code): (815)961-5686
4.4	Public Contact	Name: DAVID J. LINDSAY Telephone Number (include area code): (815)962-8867

4.5	SIC Code (4-digit)	a. 3499	b. NA	c.	d.	e.	f.

		Latitude			Longitude		
4.6	Latitude and Longitude	Degrees	Minutes	Seconds	Degrees	Minutes	Seconds
		041	47	28	088	02	27

4.7	Dun & Bradstreet Number(s) (9 digits)	a.	005130000
		b.	NA
4.8	EPA Identification Number(s) (RCRA I.D. No.) (12 characters)	a.	ILD005130000
		b.	NA
4.9	Facility NPDES Permit Number(s) (9 characters)	a.	NA
		b.	
4.10	Underground Injection Well Code (UIC) I.D. Number(s) (12 digits)	a.	NA
		b.	

SECTION 5. PARENT COMPANY INFORMATION

5.1	Name of Parent Company	[ ] NA: CLARCOR, INC.
5.2	Parent Company's Dun & Bradstreet Number	[ ] NA: (9 Digits) 005162417

EPA United States Environmental Protection Agency	EPA FORM R PART II. CHEMICAL-SPECIFIC INFORMATION	TRI FACILITY ID NUMBER 60515JLCLR2300W Chem., Cat., or Gen. Name ALUMINUM (FUME OR DUST)

SECTION 1. TOXIC CHEMICAL IDENTITY (Important: DO NOT complete this section if you complete Section 2 below.)

1.1 CAS Number (Important: Enter only one number exactly as it appears on the Section 313 list.

007429-90-5

1.2 Toxic Chemical or Chemical Category Name (Important: Enter only one name exactly as it appears on the Section 313 list.)

ALUMINUM (FUME OR DUST)

1.3 Generic Chemical Name (Important: Complete only if Part I, Section 2.1 is checked "yes."

NA

SECTION 2. MIXTURE COMPONENT IDENTITY (Important: DO NOT complete this section if you complete Section 1 above.)

2.1 Generic Chemical Name Provided by Supplier (Important: Max. of 70 chars., including numbers, letters, spaces, and punct.)

NA

SECTION 3. ACTIVITIES AND USES OF THE CHEMICAL AT THE FACILITY (Important: Check all that apply.)

3.1	Manufacture the toxic chemical:	a. [ ] Produce b. [ ] Import	If produce or import: c. [ ] For on-site use/processing d. [ ] For sale/distribution e. [ ] As a byproduct f. [ ] As an impurity
3.2	Process the toxic chemical	a. [ ] As a reactant b. [ ] As a formulation component	c. [X] As an article component d. [ ] Repackaging
3.3	Otherwise use the toxic chemical:	a. [ ] As a chemical processing aid b. [ ] As a manufacturing aid	c. [ ] Ancillary or other use

Section 4. MAXIMUM AMOUNT OF THE TOXIC CHEMICAL ON-SITE AT ANY TIME DURING THE CALENDAR YEAR

4.1	05 (Enter two-digit code from instruction package.)	

EPA United States Environmental Protection Agency	EPA FORM R PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)	TRI FACILITY ID NUMBER 60515JLCLR2300W Chem., Cat., or Gen. Name ALUMINUM (FUME OR DUST)

SECTION 5. RELEASES OF THE TOXIC CHEMICAL TO THE ENVIRONMENT ON-SITE

			A. Total Release (pounds/year) (enter range code from instructions or estimate)	B. Basis of Estimate (enter code)	C. % From Stormwater
5.1	Fugitive or non-point air emissions	[ ]NA	86	0	
5.2	Stack or point air emissions	[X]NA	NA		
5.3	Discharges to receiving streams or water bodies (enter one name per box)				
5.3.1 Stream or Water Body Name					
NA					
5.3.2 Stream or Water Body Name					
5.3.3 Stream or Water Body Name					
5.4	Underground injections on-site	[X]NA	NA		
5.5	Releases to land on-site				
5.5.1	Landfill	[X]NA	NA		
5.5.2	Land treatment/ application farming	[X]NA	NA		
5.5.3	Surface impoundment	[X]NA	NA		
5.5.4	Other disposal	[X]NA	NA		

[ ] Check here only if additional Section 5.3 information is provided on page 5 of this form.

Range Codes: A = 1-10 pounds; B = 11-499 pounds; C = 500 - 999 pounds.

EPA United States Environmental Protection Agency	EPA FORM R PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)	TRI FACILITY ID NUMBER 60515JLCLR2300W Chem., Cat., or Gen. Name ALUMINUM (FUME OR DUST)

Section 5.3 ADDITIONAL INFORMATION ON RELEASES OF THE TOXIC CHEMICAL TO THE ENVIRONMENT ON-SITE

5.3	Discharges to receiving streams or water bodies (enter one name per box)	A. Total Release (pounds/year) (enter range code from instructions or estimate)	B. Basis of Estimate (enter code)	C. % From Stormwater
5.3.4	Stream or Water Body Name			
5.3.5	Stream or Water Body Name			
5.3.6	Stream or Water Body Name			

SECTION 6. TRANSFERS OF THE TOXIC CHEMICAL IN WASTES TO OFF-SITE LOCATIONS

6.1 DISCHARGES TO PUBLICLY OWNED TREATMENT WORKS (POTW)

6.1.A Total Quantity Transferred to POTWs and Basis of Estimate

6.1.A.1 Total Transfers (pounds/year) (enter range code or estimate)	6.1.A.2 Basis of Estimate (enter code)
NA	

6.1.B POTW Name and Location Information

6.1.B.1 POTW Name		6.1.B.2 POTW Name	
Street Address		Street Address	
City	County	City	County
State	Zip Code	State	Zip Code

If additional pages of Part II, Sections 5.3 and/or 6.1 are attached, indicate the total number of pages in this box [ ] and indicate which Part II, Sections 5.3/6.1 page this is, here. [1] (example: 1,2,3,etc.)

Range Codes: A = 1-10 pounds; B = 11-499 pounds; C = 500 - 999 pounds.

EPA United States Environmental Protection Agency	EPA FORM R PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)	TRI FACILITY ID NUMBER 60515JLCLR2300W Chem., Cat., or Gen. Name ALUMINUM (FUME OR DUST)

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS

6.2.1 Off-site EPA Identification Number (RCRA ID No.)
NA

Off-Site Location Name

Street Address

City | County

State | Zip Code | Is location under control of reporting [ ] YES [ ] NO

A. Total Transfers (pounds/year) (enter range code or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)
1.	1.	1.
2.	2.	2.
3.	3.	3.
4.	4.	4.

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS

6.2.2 Off-site EPA Identification Number (RCRA ID No.)
NA

Off-Site Location Name

Street Address

City | County

State | Zip Code | Is location under control of reporting [ ] YES [ ] NO

A. Total Transfers (pounds/year) (enter range code or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)
1.	1.	1.
2.	2.	2.
3.	3.	3.
4.	4.	4.

If additional pages of Part II, Section 6.2 are attached, indicate the total number of pages in this box [ ] and indicate which Part II, Sections 6.2 page this is, here. [1]
(example: 1,2,3,etc.)

Range Codes: A = 1-10 pounds; B = 11-499 pounds; C = 500 - 999 pounds.

EPA United States Environmental Protection Agency	EPA FORM R PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)	TRI FACILITY ID NUMBER 60515JLCLR2300W Chem., Cat., or Gen. Name ALUMINUM (FUME OR DUST)

Section 7A. ON-SITE WASTE TREATMENT METHODS AND EFFICIENCY

[X] Not Applicable (NA) - Check here if no on-site treatment is applied to any waste stream containing the toxic chemical or chemical category.

a. General Waste Stream (enter code)	b. Waste Treatment Method(s) Sequence [enter 3-character code(s)]	c. Range of Influent Concentration	d. Treatment Efficiency Estimate	e. Based on Operating Data?
7A.1a	7A.1b	7A.1c	7A.1d	7A.1e
NA	1 2 3 4 5 6 7 8		%	Yes [ ] No [ ]
7A.2a	7A.2b	7A.2c	7A.2d	7A.2e
	1 2 3 4 5 6 7 8		%	Yes [ ] No [ ]
7A.3a	7A.3b	7A.3c	7A.3d	7A.3e
	1 2 3 4 5 6 7 8		%	Yes [ ] No [ ]
7A.4a	7A.4b	7A.4c	7A.4d	7A.4e
	1 2 3 4 5 6 7 8		%	Yes [ ] No [ ]
7A.5a	7A.5b	7A.5c	7A.5d	7A.5e
	1 2 3 4 5 6 7 8		%	Yes [ ] No [ ]

If additional pages are attached, indicate the total number of pages in this box [ ] and indicate which page this is, here [1].

EPA United States Environmental Protection Agency	EPA FORM R PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)	TRI FACILITY ID NUMBER 60515JLCLR2300W Chem., Cat., or Gen. Name ALUMINUM (FUME OR DUST)

Section 7B. ON-SITE ENERGY RECOVERY PROCESSES

[X] Not Applicable (NA) - Check here if no on-site energy recovery is applied to any waste stream containing the toxic chemical or chemical category.

Energy Recovery Methods [enter 3-character code(s)]

1	2	3	4
NA			

Section 7C. ON-SITE RECYCLING PROCESSES

[X] Not Applicable (NA) - Check here if no on-site recycling is applied to any waste stream containing the toxic chemical or chemical category.

Recycling Methods [enter 3-character code(s)]

1	2	3	4	5
NA				
6	**7**	**8**	**9**	**10**

EPA United States Environmental Protection Agency	EPA FORM R PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)	TRI FACILITY ID NUMBER 60515JLCLR2300W Chem., Cat., or Gen. Name ALUMINUM (FUME OR DUST)

Section 8. SOURCE REDUCTION AND RECYCLING ACTIVITIES

	All estimates can be reported using up to two significant figures.	Column A 1994 (pounds/year)	Column B 1995 (pounds/year)	Column C 1996 (pounds/year)	Column D 1997 (pounds/year)
8.1	Quantity released *	97	86	90	94
8.2	Quantity used for energy recovery on-site	0	0	0	0
8.3	Quantity used for energy recovery off-site	0	0	0	0
8.4	Quantity recycled on-site	0	0	0	0
8.5	Quantity recycled off-site	0	0	0	0
8.6	Quantity treated on-site	0	0	0	0
8.7	Quantity treated off-site	0	0	0	0

8.8	Quantity released to the environment as a result of remedial actions, catastrophic events, or one-time events not associated with production processes (pounds/year)	0
8.9	Production Ratio or Activity Index	0000.88

8.10 Did your facility engage in any source reduction activities for this chemical during the reporting year? If not, enter "NA" In Section 8.10.1 and answer Section 8.11.

	Source Reduction Activities [enter code(s)]	Methods to Identify Activity (enter codes)		
8.10.1	NA	a.	b.	c.
8.10.2		a.	b.	c.
8.10.3		a.	b.	c.
8.10.4		a.	b.	c.

		YES	NO
8.11	Is additional optional information on source reduction, recycling, or pollution control activities included with this report? (Check one box)	[ ]	[X]

* Report releases pursuant to EPRCA Section 329(8) including "any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment." Do not include any quantity treated on-site or off-site.

J. L. Clark - Tube Division
Form R 1995

PRODUCT	ISSUE	UNIT OF MEASURE	WEIGHT/ UNIT	TOTAL UNITS	TOTAL CONSUME	%	BUTANOL	%	MIBK	%	TOLUENE	%	GLYCOL E	%	XYLENE	%	NAPTHAL	%	ETHYLBEN	%	FORMALD	%	TRIMETH	%	METHETHB	%	ALUMINUM	%	MISC	NAME
374-C27-5020 H23 Lining	06-16-92	GAL	7.52	673	5,061		0	0.038	192	0.139	703	0.061	309	0.011	58		0		0		0		0		0		0	0.383	1938	MEK
374-C27-4033 XR 3164	09-01-92	GAL	8.05	47	378		0		0		0		0	0.022	8		0		0		0	0.091	34	0.022	8		0	0.001	0	Vinyl Acetat
375-W27-5029 Peel 3817	03-14-89	GAL	9.57	0	0		0		0		0		0		0		0		0		0		0		0		0		0	
222-Y27-2011 Desenex Yellow	05-16-90	GAL	11.69	226	2,642		0		0		0		0		0		0		0		0		0		0		0	0.075	198	Lead
	05-16-90	GAL	11.69	226	2,642		0		0		0		0		0		0		0		0		0		0		0	0.013	34	Chromium
222-R27-2012 ROSE	05-05-94	GAL	11.8	102	1,204		0		0		0		0		0	0.017	20		0		0	0.010	12		0		0		0	
222-Y27-2008 BR. YELLOW	04-15-93	GAL	11.32	311	3,521		0		0		0		0		0	0.019	67		0		0		0		0		0		0	
375-Z27-5048 XB2668 AAL	06-21-94	GAL	8.31	0	0		0		0		0		0		0		0		0		0	0.065	0		0		0	0.001	0	Vinyl Acetat
375-E27-0006 AL ADD	11-14-94	GAL	8.11	24	195		0		0		0		0	0.013	3		0		0		0	0.067	17		0	0.016	3		0	
PE1090	04-10-95	GAL	7.68	652	5,007		0	0.050	250	0.100	501		0	0.050	250		0		0	0.001	5		0		0		0	0.350	1753	MEK
XR1215 INTERNAL LINING	07-29-88	GAL	8.07	0	0		0	0.010	0		0		0	0.526	0		0		0		0		0		0		0	0.005	0	Propylene
660 SOLVENT	12-11-93	GAL	7.01	4,070	28,531		0		0	0.560	15977		0		0		0		0		0		0		0		0	0.440	12554	Acetone
MEK	11-15-85	GAL	6.73	987	6,643		0		0		0		0		0		0		0		0		0		0		0	1.000	6643	MEK
MINERAL SPIRITS	04-08-86	GAL	6.49	110	714		0		0		0		0		0		0		0		0		0		0		0		0	
GLYCOL ETHER DB ACETATE	03-09-87	GAL	8.18	450	3,681		0		0		0	1.000	3681		0		0		0		0		0		0		0		0	
GLYCOL ETHER EB ACETATE	04-08-87	GAL	7.85	919	7,214		0		0		0	1.000	7214		0		0		0		0		0		0		0		0	
2300 VINYL REDUCER	07-00-86	GAL	7.61	0	0		0		0		0		0		0		0		0		0		0		0		0		0	
111 TRICHLOR	04-08-86	GAL	10.82	0	0		0		0		0		0		0		0		0		0		0		0		0	1.000	0	111 TCE
10-084CF INTERNAL LINING	01-19-95	GAL	7.49	1,100	8,239		0	0.207	1705		0	0.116	952	0.018	148		0		0	0.005	40	0.052	425		0		0	0.043	354	Phenol
G72-WC-18 WHITE VINYL	01-27-81	GAL	11.56	0	0		0		0		0		0	0.060	0		0		0		0		0		0		0	0.005	0	Propylene
379W87 WHITE POLYESTER		GAL	12.49	0	0		0		0		0	0.100	0	0.050	0		0		0		0	0.050	0		0		0	0.050	0	Benzene
1170 ALLOY ALUMINUM	11-00-85	LBS	1.00	855,731	855,731		0		0		0		0		0		0		0		0		0		0	1.000	855845		0	
IT-404-077	07-05-88	GAL	8.20	0	0		0		0		0	0.650	0	0.300	0		0		0		0		0		0		0		0	
DAREX 313	08-04-92	GAL	9.32	110	1,025		0		0		0		0		0		0		0		0		0		0		0	0.005	5	Ammonia
		GAL	9.32	110	1,025		0		0		0		0		0		0		0		0		0		0		0	0.080	82	Zinc Cmp
DAREX B-31F	01-26-89	GAL	9.15	65	595		0		0		0		0		0		0		0		0		0		0		0	0.005	3	Ammonia
		GAL	9.15	65	595		0		0		0		0		0		0		0		0		0		0		0	0.070	42	Zinc Cmpd
220-W27-1024 WHITE	03-29-93	GAL	11.82	6,842	80,872		0		0		0		0		0	0.017	1375		0		0		0		0		0		0	
867-W27-7009 DUO WHITE	02-04-93	GAL	9.86		0		0		0		0	0.085	0	0.209	0		0	0.049	0		0		0		0		0		0	
375-W27-6017 WHITE	01-21-93	GAL	8.08		0		0	0.001	0		0		0	0.428	0		0	0.100	0		0		0		0		0	0.002	0	Vinyl Acetat
VY8M80563A	07-28-88	GAL	10.24		0	0.013	0		0		0		0		0		0		0		0		0		0		0	0.033	0	Chromium
375-W27-5028 WHITE	06-03-91	GAL	11.65		0		0		0		0		0		0		0		0		0		0		0		0	0.002	0	Propylene
375-W27-5029 WHITE PEEL	04-26-91	GAL	9.57		0		0		0		0		0		0		0		0		0		0		0		0	0.001	0	Vinyl Acetat
JLC1130 C/T WHITE	06-14-90	GAL	12.66		0	0.013	0		0		0		0	0.084	0		0		0		0		0		0		0		0	
XR 3756 GREEN	07-29-88	GAL	10.20		0		0		0		0		0		0		0		0		0		0		0		0	0.003	0	Lead
		GAL	10.20		0		0		0		0		0		0		0		0		0		0		0		0	0.002	0	Chromium
VL8M80754 LT BLUE PEEL	07-28-88	GAL	9.59		0		0		0		0		0		0		0		0		0		0		0		0		0	
VY8M81232 PMS 109 YELLOW		GAL	11.84		0		0		0		0		0		0		0		0		0		0		0		0		0	
VG8M81231 PMS 333 GREEN		GAL	11.23		0		0		0		0		0		0		0		0		0		0		0		0		0	
KOLACK V1021	09-07-92	GAL	7.49		0		0		0		0		0		0		0		0		0		0		0		0		0	
ANTI OXIDANT Z99-00-5569		GAL	6.57		0		0		0		0		0		0		0		0		0		0		0		0	1.000	0	IPA
SOLVENT 1902	07-00-84	GAL	7.58		0		0		0		0		0		0		0		0		0		0		0		0		0	
BASF DRIER 87E-598	07-15-85	GAL	7.20		0		0		0		0		0		0		0		0		0		0		0		0		0	
BASF HARDNER 86E-1242	07-15-85	GAL	7.20		0		0		0		0		0		0		0		0		0		0		0		0		0	
379W78 WHITE	01-22-93	GAL	12.53		0		0		0		0	0.150	0		0		0		0		0	0.050	0		0		0		0	
379W31 WHITE	04-10-90	GAL	12.36		0	0.024	0		0		0	0.013	0	0.018	0		0		0	0.001	0		0		0		0		0	
CARBITOL SOLVENT	04-08-87	GAL	8.53		0		0		0		0	0.720	0		0		0		0		0		0		0		0	0.280	0	Ethylene Gl
PHOSPHORIC ACID	02-18-86	GAL	14.06		0		0		0		0		0		0		0		0		0		0		0		0	0.850	0	Phosphoric
G72WC20 TUBE ENAMEL	02-19-91	GAL	11.66		0		0		0		0		0		0		0		0		0		0		0		0	0.050	0	sec-Butyl Al
93500 CLEAR	02-01-92	GAL	8.63		0		0		0	0.030	0		0		0		0		0		0		0		0		0	0.270	0	Acetone
		GAL	8.63				0		0		0		0		0		0		0		0		0		0		0	0.300	0	111 Trichlor
091951 CLEAR LACQUER	02-01-92	GAL	8.42		0		0		0	0.120	0		0	0.080	0		0	0.020	0		0		0		0		0	0.320	0	Acetone
		GAL	8.42				0		0		0		0		0		0		0		0		0		0		0	0.080	0	MEK
3846044 GOLD ENAMEL	04-30-92	GAL	7.90		0	0.023	0	0.300	0		0	0.250	0	0.021	0		0	0.010	0	0.010	0		0		0		0	0.008	0	Phenol
27-015 GOLD	05-09-85	GAL	8.00		0	0.020	0		0		0	0.096	0	0.089	0		0		0		0		0		0		0	0.261	0	MEK
10-084 AT THINNER	05-09-85	GAL	7.60		0		0		0		0	0.259	0		0		0		0		0		0		0		0		0	
TOOL STEELS	04-00-91	LBS	1.00		0		0		0		0		0		0		0		0		0		0		0	0.020	0	0.270	0	Chromium
		LBS	1.00		0		0		0		0		0		0		0		0		0		0		0		0	0.100	0	Cobalt
		LBS	1.00		0		0		0		0		0		0		0		0		0		0		0		0	0.050	0	Copper
		LBS	1.00		0		0		0		0		0		0		0		0		0		0		0		0	0.130	0	Manganese
		LBS	1.00		0		0		0		0		0		0		0		0		0		0		0		0	0.380	0	Nickel
		LBS	1.00		0		0		0		0		0		0		0		0		0		0		0		0	0.020	0	Selenium
5041044 GOLD	09-22-86	GAL	6.99		0	0.050	0	0.150	0	0.350	0	0.150	0		0		0		0		0		0		0		0		0	
IMPROVED POWER PLAY	05-00-87	GAL	9.02		0		0		0		0	0.120	0		0		0		0		0		0		0		0		0	
TASKMASTER STAINLESS	04-27-87	GAL	7.83		0		0		0		0		0		0		0		0		0		0		0		0	0.300	0	111 TCE
ETHYL ACETATE	01-00-83	GAL	7.50		0		0		0		0		0		0		0		0		0		0		0		0		0	
DAREX OILPROOF W9113S	11-12-85	GAL	9.07		0		0		0		0		0		0		0		0		0		0		0		0	0.005	0	Ammonia
HYDROCHLORIC ACID	ND	GAL	9.91		0		0		0		0		0		0		0		0		0		0		0		0	1.000	0	Hydrochlor
NITRIC ACID	08-07-78	GAL	11.73		0		0		0		0		0		0		0		0		0		0		0		0	1.000	0	Nitric Acid
CEMENTED CARBIDE NICKEL	11-05-85	LBS	1.00		0		0		0		0		0		0		0		0		0		0		0		0	0.180	0	Nickel

CAST COBALT ALLOY	11-22-85	LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.500	0	Cobalt
		LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.320	0	Chromium
		LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.030	0	Manganese
MILD STEEL ELECTRODES	11-00-85	LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.041	0	Manganese
		LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.300	0	Chromium
		LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.400	0	Nickel
		LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.014	0	Copper
WELCO 15-15EC	11-25-84	LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.600	0	Copper
		LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.400	0	Zinc
ZINK BEHENATE	08-14-86	LBS	1.00		0		0		0		0		0		0		0		0		0		0	1.000	0	Zinc
ZINC STEARATE	06-01-92	LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.900	0	Zinc
CEMENTED CARBIDE COBALT	05-01-89	LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.250	0	Cobalt
		LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.025	0	Chromium
BRAZING ALLOY		LBS	1.00		0		0		0		0		0		0		0		0		0		0		0	
COPPER	04-01-86	LBS	1.00		0		0		0		0		0		0		0		0		0		0	1.000	0	Copper
TITANIUM	04-01-86	LBS	1.00		0		0		0		0		0		0		0		0	0.060	0		0	0.050	0	Manganese
		LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.060	0	Chromium
		LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.025	0	Copper
		LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.008	0	Nickel
STAINLESS STEEL	04-01-86	LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.300	0	Chromium
		LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.270	0	Nickel
		LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.060	0	Manganese
		LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.060	0	Copper
		LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.020	0	Cobalt
ALLOY STEEL	04-01-86	LBS	1.00		0		0		0		0		0		0		0		0	0.020	0		0	0.050	0	Nickel
		LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.050	0	Chromium
		LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.020	0	Manganese
		LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.010	0	Copper
		LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.010	0	Lead
ALUMINUM ALLOYS	04-01-86	LBS	1.00		0		0		0		0		0		0		0		0	0.997	0		0	0.100	0	Copper
		LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.020	0	Manganese
		LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.020	0	Cobalt
		LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.100	0	Zinc
		LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.005	0	Chromium
		LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.005	0	Nickel
		LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.010	0	Lead
CARBON STEEL	04-01-86	LBS	1.00		0		0		0		0		0		0		0		0	0.010	0		0	0.020	0	Manganese
		LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.010	0	Lead
BRONZE	04-01-86	LBS	1.00		0		0		0		0		0		0		0		0	0.140	0		0	0.990	0	Copper
		LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.140	0	Nickel
		LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.040	0	Manganese
		LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.020	0	Cobalt
		LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.010	0	Zinc
		LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.010	0	Lead
BRASS	04-01-86	LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.700	0	Copper
		LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.400	0	Zinc
		LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.040	0	Lead
NICKEL BASED ALLOY	04-01-86	LBS	1.00		0		0		0		0		0		0		0		0	0.050	0		0	0.480	0	Chromium
		LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.680	0	Copper
		LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.150	0	Cobalt
		LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.050	0	Manganese
		LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.990	0	Nickel
150 SOLVENT	04-10-86	GAL	8.22	110	904		0		0		0		0	0.090	81		0		0		0		0		0	
KOLACK WHITE A 4811	09-07-92	GAL	9.98		0	0.046	0		0	0.041	0	0.004	0		0		0		0		0		0		0	
SP-1103 WAX	07-01-86	LBS	1.00	1100	1,100		0		0		0		0		0		0		0		0		0		0	
AMR-12 WAX	07-31-91	LBS	1.00	2640	2,640		0		0		0		0		0		0		0		0		0		0	
IL-320-1528/45	08-25-93	GAL	8.65				0		0		0	0.810	0		0		0		0		0		0		0	
866-C27-0003 DUO CLEAR	09-22-93	GAL	8.05				0		0	0.237	0		0		0		0		0		0		0		0	
5061041 GOLD	12-14-90	GAL	7.34			0.05	0	0.15	0	0.15	0	0.05	0		0	0.01	0		0		0		0		0	
RESINOID BONDED GRIND WH	02-11-92	LBS	1.00				0		0		0		0		0		0		0	0.900	0				0	
GRIND-O-FLEX	06-30-92	LBS	1.00				0		0		0		0		0		0		0	0.600	0				0	
375-W27-5026 Vinyl White	01-03-95	LBS	10.04	277		0.011	0		0		0	0.01	0	0.01	0		0	0.04	0		0				0	
CERTANIUM 701 ALLOY	06-23-88	LBS	1.00		0		0		0		0		0		0		0		0		0		0	0.010	0	Manganese
		TOTAL					0.0		2148.2		17181.4		12156.3		465.2		1543.6		0.0		44.6		488.2		8.3	855648.5	29605.8
Waste Solvent		GAL	7.01	1,705	11,952					0.56	6693														0.44	5259 Acetone
less 8% fugitive			7.01	722	5,061					0.56	2834														0.44	[redacted] Acetone

Toluene Glycol E. Al

MEK = 10334
Acetone = 12554

PRODUCTIVITY INDEX

$$\frac{1995\ PROD}{1994\ PROD} = \frac{57,267,869}{64,853,000}\ 0.8$$

TUBE 1995 FORM R

① ALUMINUM 855,649

Less 0.01% Fugitive 85.6#

1996 } Estimate 5%
1997 } increase in business (Sect 8.1

② ACETONE 12554

Less fugitive 3% 377

12177

Less Waste Solvent 5259

6,918

Summer 404 ~~5534~~ 4036 x 10% = 404

Winter Total ÷ 5mos ~~1384~~ 2882

3286

Acetone not required for 1995

③ MEK 10334

Less fugitive 4% 413

9921

Less Waste 2.7% 268

9653

Summer ~~588~~ 563 ~~5787~~ 5631 x 10% ~ ~~582~~ 563

Winter (5/12) ~~4134~~ 4022

~~4722~~ 4585

	Max Qty
MEK	737
H23	778
PETOTO	581
	2096

(4)

TOLUENE	17181			
Less fugitive 3%	515			
	16,566		660	1727
Less Waste Solvent	6693		H23	282
	9873		PE7090	166
Summer	576	5759 ~~4114~~ x10%		2175
Winter (5/12)	4114			
	4690			

(5)

				1995	
GLYCOL ETHER	12156			6261	
Less fugitive 4%	486			250 ~~63~~	
	11670			6011 ~~6198~~	
Less Waste Solvent 1%	117			60	
	11553			5951	
			H-23	122	
Summer	674	6739 x10%	EB	3681	3471 x1
Winter (5/12)	4814		DB	3391	2480
	5488		10-084	239	282
				~~7311~~ 7433	

TUBE DIV

07/23/96

07/23/96
1996 CRTK
DECO

		UNIT	WT/GAL	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPT	OCT	NOV.	DEC	TOTAL	TOTAL WT	MAX ON HAND	TOTAL MAX
4000010	MEK	GL	6.73	110	55	55	55	55	110	110	110	110	110		107	987	6642.5	110	740.3
4000020	DB ACETATE	GL	8.18												450	450	3681.0	450	3681
4000030	EB ACETATE	GL	7.85			55						432			432	919	7214.2	432	3391.2
4000040	660 SOLVENT	GL	7.01	385	440	330	220	440	220	440	330	330	385	220	330	4070	28530.7	440	3084.4
4000050	MINERAL SPIRITS	GL	6.49				55					55				110	713.9	55	356.95
4000070	150 SOLVENT	GL	8.22		55										55	110	904.2	55	452.1
4023000	2300 REDUCER	GL	7.61																
4122000	222-R27-2012 ROSE	GL	11.8						102							102	1203.6	102	1203.6
4122027	220-W27-1024 POLYESTER	GL	11.82	560	703	560	545	560	560	560	560	534	560	280	860	6842	80872.4	860	10165.2
4137840	375-W27-5026 VINYL	GL	10.04	100	150	27										277	2781.1	150	1506
4138170	375-W27-5029 PEEL	GL	9.57																
4172180	G72WC18 VINYL	GL	11.56																
4180754	VL8M80754	GL	9.59																
4182008	222-Y27-2008 BR. YELLOW	GL	11.32	99		104		108								311	3520.5	108	1222.56
4182011	222-Y27-2011 DES. YEL	GL	11.69			118						108				226	2641.9	118	1379.42
4200023	H-23	GL	7.52	270	203								200			673	5061.0	270	2030.4
4200040	IT-404	GL	8.2																
4200048	375-Z27-5048 XB2666 AAL	GL	8.31																
4200049	375-E27-0006 AL ADD	GL	8.11								24					24	194.6	24	194.64
4200061	S5061-041	GL	7.34																
4200064	374-C27-4033 XR3164 CLR	GL	8.05								47					47	378.4	47	378.35
4200084	10-084-A	GL	7.49		220		220		275			165			220	1100	8239.0	275	2059.75
4200115	XR-1215	GL	8.07																
4200118	S-3846	GL																	
4201090	PE1090	GL	7.67	165				216				106			165	652	5000.8	216	1656.72
4238466	S-3846-044	GL	7.9																
4300012	AMR-12	LB	1		990					660		990				2640	2640.0	990	990
4300013	SP-1103	LB	1								1100					1100	1100.0	1100	1100
4400031	B-31F	GL	9.15			25				15			25			65	594.8	25	228.75
4400313	DAREX 313	GL	9.32			25		25		35			25			110	1025.2	35	326.2

J. L. Clark
a CLARCOR company

Date: November 8, 1996

To: Glenn Ceckowski

By: Jim Klotz

Copies to:

Reference: J. L. Clark-Tube Division

Subject: Form R Reporting

Attached is the confirmation from USEPA for our recently submitted Form R report for 1995. Please review the attached and advise if the data reflects the specific data which we input. Any changes need to be submitted by November 25th, so we would appreciate your prompt review. If you have any questions, please let me know.

Jim

Everything checks out consistant with our calculations and original Form R report.

Glenn 11/12

U.S. Environmental Protection Agency
Office of Prevention, Pesticides and Toxic Substances
Office of Pollution Prevention and Toxics
Information Management Division

JAMES K. KLOTZ
J. L. CLARK TUBE DIV.
2300 WISCONSIN AVE.
DOWNERS GROVE, IL 60515

11/08/96

TRI ID #: 60515-JLCLR-2300W
Reporting Year: 1995

T O X I C R E L E A S E I N V E N T O R Y (T R I)

R E L E A S E V A L U E R E P O R T

The attached reports list your Alternate Threshold Certification Statements and the chemical indentities and corresponding release values from your Form R reports.

EPA wishes to represent accurately the data reported by your facility. We believe our data entry is of excellent quality; however, as a final quality measure, we ask that you verify this report against your own records. If the data reported do not match those you submitted, please let us know within 21 days of receipt of this report, by following these instructions:

- On the attached report, mark through the erroneous value and write the correct value next to it;
- Return the corrected report to:

  The EPCRA Reporting Center
  P.O. Box 3348
  Merrifield, VA 22116-3348
  Attn: TRI RVR

If you do not find any errors in the report, no further action is required. Please note:

1) The report lists only those submissions which have completed our internal data quality checks. If any reports or revisions submitted by your facility are not listed, you will be receiving another report.

2) If you have submitted a request to withdraw a submission, your request may still be in process. You DO NOT have to submit another withdrawal request.

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(703) 816-4445

Tell the operator that you are calling about the TRI RVR.

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(800) 535-0202 (toll free, outside the D.C. Metro area)
(800) 553-7672 (TDD #)
(703) 412-9877 (D.C. Metro and Northern Virginia area)

Thank you for assisting in our efforts to make the TRI data as accurate as possible.

/s/ Ruby N. Boyd

Ruby N. Boyd, Acting Chief
Toxic Release Inventory
Information Management Branch (7407)

Attachment(s)

TRI FACILITY ID: 60515-JLCLR-2300
DATE: 11/08/96

J. L. CLARK TUBE DIV.
2300 WISCONSIN AVE.
DOWNERS GROVE, IL 60515

R E L E A S E V A L U E R E P O R T

DOCUMENT CONTROL NBR.	CHEMICAL NAME	CAS NUMBE
13-95-09042329-6-IL	ALUMINUM (FUME OR DUST)	007429-90-

5.1	Fugitive or non-point air emissions	8
5.2	Stack or point air emissions	N
5.3.A	Discharges to water bodies NA	N
5.4	Underground injections on-site	N
5.5.1	Releases to landfill	N
5.5.2	Releases to land treatment/application farming	N
5.5.3	Releases to surface impoundment	N
5.5.4	Releases to other land disposal	N
6.1.A	Total quantity transferred to POTWS	N
8.1.A	Quantity released	97
8.1.B	Quantity released	86
8.1.C	Quantity released	90
8.1.D	Quantity released	94
8.2.A	Quantity used for energy recovery on-site	0
8.2.B	Quantity used for energy recovery on-site	0
8.2.C	Quantity used for energy recovery on-site	0
8.2.D	Quantity used for energy recovery on-site	0
8.3.A	Quantity used for energy recovery off-site	0
8.3.B	Quantity used for energy recovery off-site	0
8.3.C	Quantity used for energy recovery off-site	0
8.3.D	Quantity used for energy recovery off-site	0
8.4.A	Quantity recycled on-site	0
8.4.B	Quantity recycled on-site	0
8.4.C	Quantity recycled on-site	0
8.4.D	Quantity recycled on-site	0
8.5.A	Quantity recycled off-site	0
8.5.B	Quantity recycled off-site	0
8.5.C	Quantity recycled off-site	0
8.5.D	Quantity recycled off-site	0
8.6.A	Quantity treated on-site	0
8.6.B	Quantity treated on-site	0
8.6.C	Quantity treated on-site	0
8.6.D	Quantity treated on-site	0
8.7.A	Quantity treated off-site	0
8.7.B	Quantity treated off-site	0
8.7.C	Quantity treated off-site	0
8.7.D	Quantity treated off-site	0
8.8	Quantity released from catastrophic/remedial action	0
8.9	Production ratio or activity index	.88

TRI FACILITY ID: 60515-JLCLR-2300
DATE: 11/08/96

J. L. CLARK TUBE DIV.
2300 WISCONSIN AVE.
DOWNERS GROVE, IL 60515

R E L E A S E V A L U E R E P O R T

DOCUMENT CONTROL NBR.	CHEMICAL NAME	CAS NUMBE
13-95-09042330-8-IL	TOLUENE	000108-88-

5.1	Fugitive or non-point air emissions	51
5.2	Stack or point air emissions	4,69
5.3.A	Discharges to water bodies NA	N
5.4	Underground injections on-site	N
5.5.1	Releases to landfill	N
5.5.2	Releases to land treatment/application farming	N
5.5.3	Releases to surface impoundment	N
5.5.4	Releases to other land disposal	N
6.1.A	Total quantity transferred to POTWS	N
6.2	Transfer to other off-site: WASTE RESEARCH & RECLAM	6,69
6.2	Transfer to other off-site: WASTE RESEARCH & RECLAM	NA
8.1.A	Quantity released	7,157
8.1.B	Quantity released	4,690
8.1.C	Quantity released	4,925
8.1.D	Quantity released	5,171
8.2.A	Quantity used for energy recovery on-site	0
8.2.B	Quantity used for energy recovery on-site	0
8.2.C	Quantity used for energy recovery on-site	0
8.2.D	Quantity used for energy recovery on-site	0
8.3.A	Quantity used for energy recovery off-site	0
8.3.B	Quantity used for energy recovery off-site	0
8.3.C	Quantity used for energy recovery off-site	0
8.3.D	Quantity used for energy recovery off-site	0
8.4.A	Quantity recycled on-site	0
8.4.B	Quantity recycled on-site	0
8.4.C	Quantity recycled on-site	0
8.4.D	Quantity recycled on-site	0
8.5.A	Quantity recycled off-site	2,835
8.5.B	Quantity recycled off-site	6,693
8.5.C	Quantity recycled off-site	7,028
8.5.D	Quantity recycled off-site	7,379
8.6.A	Quantity treated on-site	0
8.6.B	Quantity treated on-site	0
8.6.C	Quantity treated on-site	0
8.6.D	Quantity treated on-site	0
8.7.A	Quantity treated off-site	0
8.7.B	Quantity treated off-site	0
8.7.C	Quantity treated off-site	0
8.7.D	Quantity treated off-site	0
8.8	Quantity released from catastrophic/remedial action	0
8.9	Production ratio or activity index	.88

TRI FACILITY ID: 60515-JLCLR-2300I
DATE: 11/08/96

J. L. CLARK TUBE DIV.
2300 WISCONSIN AVE.
DOWNERS GROVE, IL 60515

R E L E A S E V A L U E R E P O R T

DOCUMENT CONTROL NBR.	CHEMICAL NAME	CAS NUMBEI
13-95-09042331-0-IL	METHYL ETHYL KETONE	000078-93-3

5.1	Fugitive or non-point air emissions	413
5.2	Stack or point air emissions	4,585
5.3.A	Discharges to water bodies NA	NA
5.4	Underground injections on-site	NA
5.5.1	Releases to landfill	NA
5.5.2	Releases to land treatment/application farming	NA
5.5.3	Releases to surface impoundment	NA
5.5.4	Releases to other land disposal	NA
6.1.A	Total quantity transferred to POTWS	NA
6.2	Transfer to other off-site: WASTE RESEARCH & RECLAM	268
6.2	Transfer to other off-site: WASTE RESEARCH & RECLAM	NA
8.1.A	Quantity released	5,817
8.1.B	Quantity released	4,585
8.1.C	Quantity released	4,814
8.1.D	Quantity released	5,055
8.2.A	Quantity used for energy recovery on-site	0
8.2.B	Quantity used for energy recovery on-site	0
8.2.C	Quantity used for energy recovery on-site	0
8.2.D	Quantity used for energy recovery on-site	0
8.3.A	Quantity used for energy recovery off-site	0
8.3.B	Quantity used for energy recovery off-site	0
8.3.C	Quantity used for energy recovery off-site	0
8.3.D	Quantity used for energy recovery off-site	0
8.4.A	Quantity recycled on-site	0
8.4.B	Quantity recycled on-site	0
8.4.C	Quantity recycled on-site	0
8.4.D	Quantity recycled on-site	0
8.5.A	Quantity recycled off-site	232
8.5.B	Quantity recycled off-site	268
8.5.C	Quantity recycled off-site	281
8.5.D	Quantity recycled off-site	295
8.6.A	Quantity treated on-site	0
8.6.B	Quantity treated on-site	0
8.6.C	Quantity treated on-site	0
8.6.D	Quantity treated on-site	0
8.7.A	Quantity treated off-site	0
8.7.B	Quantity treated off-site	0
8.7.C	Quantity treated off-site	0
8.7.D	Quantity treated off-site	0
8.8	Quantity released from catastrophic/remedial action	0
8.9	Production ratio or activity index	.88

TRI FACILITY ID: 60515-JLCLR-2300I
DATE: 11/08/96

J. L. CLARK TUBE DIV.
2300 WISCONSIN AVE.
DOWNERS GROVE, IL 60515

R E L E A S E V A L U E R E P O R T

DOCUMENT CONTROL NBR.	CHEMICAL NAME	CAS NUMBEI
13-95-09042332-2-IL	CERTAIN GLYCOL ETHERS	N230 - -

5.1	Fugitive or non-point air emissions	48(
5.2	Stack or point air emissions	5,48(
5.3.A	Discharges to water bodies NA	NI
5.4	Underground injections on-site	NI
5.5.1	Releases to landfill	NI
5.5.2	Releases to land treatment/application farming	NI
5.5.3	Releases to surface impoundment	NI
5.5.4	Releases to other land disposal	NI
6.1.A	Total quantity transferred to POTWS	NI
6.2	Transfer to other off-site: WASTE RESEARCH & RECLAM	117
6.2	Transfer to other off-site: WASTE RESEARCH & RECLAM	NA
8.1.A	Quantity released	2,827
8.1.B	Quantity released	5,488
8.1.C	Quantity released	5,762
8.1.D	Quantity released	6,050
8.2.A	Quantity used for energy recovery on-site	0
8.2.B	Quantity used for energy recovery on-site	0
8.2.C	Quantity used for energy recovery on-site	0
8.2.D	Quantity used for energy recovery on-site	0
8.3.A	Quantity used for energy recovery off-site	0
8.3.B	Quantity used for energy recovery off-site	0
8.3.C	Quantity used for energy recovery off-site	0
8.3.D	Quantity used for energy recovery off-site	0
8.4.A	Quantity recycled on-site	0
8.4.B	Quantity recycled on-site	0
8.4.C	Quantity recycled on-site	0
8.4.D	Quantity recycled on-site	0
8.5.A	Quantity recycled off-site	60
8.5.B	Quantity recycled off-site	117
8.5.C	Quantity recycled off-site	123
8.5.D	Quantity recycled off-site	129
8.6.A	Quantity treated on-site	0
8.6.B	Quantity treated on-site	0
8.6.C	Quantity treated on-site	0
8.6.D	Quantity treated on-site	0
8.7.A	Quantity treated off-site	0
8.7.B	Quantity treated off-site	0
8.7.C	Quantity treated off-site	0
8.7.D	Quantity treated off-site	0
8.8	Quantity released from catastrophic/remedial action	0
8.9	Production ratio or activity index	.88

J. L. Clark
a CLARCOR company

Date: November 8, 1996

To: Glenn Ceckowski

By: Jim Klotz

Copies to:

Reference: J. L. Clark-Tube Division

Subject: Form R Reporting

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U.S. Environmental Protection Agency
Office of Prevention, Pesticides and Toxic Substances
Office of Pollution Prevention and Toxics
Information Management Division

JAMES K. KLOTZ
J. L. CLARK TUBE DIV.
2300 WISCONSIN AVE.
DOWNERS GROVE, IL 60515

11/08/96

TRI ID #: 60515-JLCLR-2300W
Reporting Year: 1995

T O X I C R E L E A S E I N V E N T O R Y (T R I)

R E L E A S E V A L U E R E P O R T

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/s/ Ruby N. Boyd

Ruby N. Boyd, Acting Chief
Toxic Release Inventory
Information Management Branch (7407)

Attachment(s)

TRI FACILITY ID: 60515-JLCLR-2
DATE: 11/08/96

J. L. CLARK TUBE DIV.
2300 WISCONSIN AVE.
DOWNERS GROVE, IL 60515

R E L E A S E V A L U E R E P O R T

DOCUMENT CONTROL NBR.	CHEMICAL NAME	CAS NU
13-95-09042329-6-IL	ALUMINUM (FUME OR DUST)	007429-

5.1	Fugitive or non-point air emissions
5.2	Stack or point air emissions
5.3.A	Discharges to water bodies NA
5.4	Underground injections on-site
5.5.1	Releases to landfill
5.5.2	Releases to land treatment/application farming
5.5.3	Releases to surface impoundment
5.5.4	Releases to other land disposal
6.1.A	Total quantity transferred to POTWS
8.1.A	Quantity released
8.1.B	Quantity released
8.1.C	Quantity released
8.1.D	Quantity released
8.2.A	Quantity used for energy recovery on-site
8.2.B	Quantity used for energy recovery on-site
8.2.C	Quantity used for energy recovery on-site
8.2.D	Quantity used for energy recovery on-site
8.3.A	Quantity used for energy recovery off-site
8.3.B	Quantity used for energy recovery off-site
8.3.C	Quantity used for energy recovery off-site
8.3.D	Quantity used for energy recovery off-site
8.4.A	Quantity recycled on-site
8.4.B	Quantity recycled on-site
8.4.C	Quantity recycled on-site
8.4.D	Quantity recycled on-site
8.5.A	Quantity recycled off-site
8.5.B	Quantity recycled off-site
8.5.C	Quantity recycled off-site
8.5.D	Quantity recycled off-site
8.6.A	Quantity treated on-site
8.6.B	Quantity treated on-site
8.6.C	Quantity treated on-site
8.6.D	Quantity treated on-site
8.7.A	Quantity treated off-site
8.7.B	Quantity treated off-site
8.7.C	Quantity treated off-site
8.7.D	Quantity treated off-site
8.8	Quantity released from catastrophic/remedial action
8.9	Production ratio or activity index

TRI FACILITY ID: 60515-JLCLR-2
DATE: 11/08/96

J. L. CLARK TUBE DIV.
2300 WISCONSIN AVE.
DOWNERS GROVE, IL 60515

R E L E A S E V A L U E R E P O R T

DOCUMENT CONTROL NBR.	CHEMICAL NAME	CAS NU
13-95-09042330-8-IL	TOLUENE	000108-

5.1	Fugitive or non-point air emissions	
5.2	Stack or point air emissions	4
5.3.A	Discharges to water bodies NA	
5.4	Underground injections on-site	
5.5.1	Releases to landfill	
5.5.2	Releases to land treatment/application farming	
5.5.3	Releases to surface impoundment	
5.5.4	Releases to other land disposal	
6.1.A	Total quantity transferred to POTWS	
6.2	Transfer to other off-site: WASTE RESEARCH & RECLAM	6
6.2	Transfer to other off-site: WASTE RESEARCH & RECLAM	
8.1.A	Quantity released	7.
8.1.B	Quantity released	4.
8.1.C	Quantity released	4,
8.1.D	Quantity released	5,
8.2.A	Quantity used for energy recovery on-site	
8.2.B	Quantity used for energy recovery on-site	
8.2.C	Quantity used for energy recovery on-site	
8.2.D	Quantity used for energy recovery on-site	
8.3.A	Quantity used for energy recovery off-site	
8.3.B	Quantity used for energy recovery off-site	
8.3.C	Quantity used for energy recovery off-site	
8.3.D	Quantity used for energy recovery off-site	
8.4.A	Quantity recycled on-site	
8.4.B	Quantity recycled on-site	
8.4.C	Quantity recycled on-site	
8.4.D	Quantity recycled on-site	
8.5.A	Quantity recycled off-site	2,
8.5.B	Quantity recycled off-site	6,
8.5.C	Quantity recycled off-site	7,
8.5.D	Quantity recycled off-site	7,
8.6.A	Quantity treated on-site	
8.6.B	Quantity treated on-site	
8.6.C	Quantity treated on-site	
8.6.D	Quantity treated on-site	
8.7.A	Quantity treated off-site	
8.7.B	Quantity treated off-site	
8.7.C	Quantity treated off-site	
8.7.D	Quantity treated off-site	
8.8	Quantity released from catastrophic/remedial action	
8.9	Production ratio or activity index	

TRI FACILITY ID: 60515-JLCLR-2
DATE: 11/08/96

J. L. CLARK TUBE DIV.
2300 WISCONSIN AVE.
DOWNERS GROVE, IL 60515

R E L E A S E V A L U E R E P O R T

DOCUMENT CONTROL NBR.	CHEMICAL NAME	CAS NU
13-95-09042331-0-IL	METHYL ETHYL KETONE	000078-

5.1	Fugitive or non-point air emissions	
5.2	Stack or point air emissions	4
5.3.A	Discharges to water bodies NA	
5.4	Underground injections on-site	
5.5.1	Releases to landfill	
5.5.2	Releases to land treatment/application farming	
5.5.3	Releases to surface impoundment	
5.5.4	Releases to other land disposal	
6.1.A	Total quantity transferred to POTWS	
6.2	Transfer to other off-site: WASTE RESEARCH & RECLAM	
6.2	Transfer to other off-site: WASTE RESEARCH & RECLAM	
8.1.A	Quantity released	5,
8.1.B	Quantity released	4,
8.1.C	Quantity released	4,
8.1.D	Quantity released	5,
8.2.A	Quantity used for energy recovery on-site	
8.2.B	Quantity used for energy recovery on-site	
8.2.C	Quantity used for energy recovery on-site	
8.2.D	Quantity used for energy recovery on-site	
8.3.A	Quantity used for energy recovery off-site	
8.3.B	Quantity used for energy recovery off-site	
8.3.C	Quantity used for energy recovery off-site	
8.3.D	Quantity used for energy recovery off-site	
8.4.A	Quantity recycled on-site	
8.4.B	Quantity recycled on-site	
8.4.C	Quantity recycled on-site	
8.4.D	Quantity recycled on-site	
8.5.A	Quantity recycled off-site	
8.5.B	Quantity recycled off-site	
8.5.C	Quantity recycled off-site	
8.5.D	Quantity recycled off-site	
8.6.A	Quantity treated on-site	
8.6.B	Quantity treated on-site	
8.6.C	Quantity treated on-site	
8.6.D	Quantity treated on-site	
8.7.A	Quantity treated off-site	
8.7.B	Quantity treated off-site	
8.7.C	Quantity treated off-site	
8.7.D	Quantity treated off-site	
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8.9	Production ratio or activity index	

TRI FACILITY ID: 60515-JLCLR-2
DATE: 11/08/96

J. L. CLARK TUBE DIV.
2300 WISCONSIN AVE.
DOWNERS GROVE, IL 60515

R E L E A S E V A L U E R E P O R T

DOCUMENT CONTROL NBR.	CHEMICAL NAME	CAS NU
13-95-09042332-2-IL	VERTAIN GLYCOL ETHERS	N230 -

5.1	Fugitive or non-point air emissions	
5.2	Stack or point air emissions	5
5.3.A	Discharges to water bodies NA	
5.4	Underground injections on-site	
5.5.1	Releases to landfill	
5.5.2	Releases to land treatment/application farming	
5.5.3	Releases to surface impoundment	
5.5.4	Releases to other land disposal	
6.1.A	Total quantity transferred to POTWS	
6.2	Transfer to other off-site: WASTE RESEARCH & RECLAM	
6.2	Transfer to other off-site: WASTE RESEARCH & RECLAM	
8.1.A	Quantity released	2,
8.1.B	Quantity released	5,
8.1.C	Quantity released	5,
8.1.D	Quantity released	6,
8.2.A	Quantity used for energy recovery on-site	
8.2.B	Quantity used for energy recovery on-site	
8.2.C	Quantity used for energy recovery on-site	
8.2.D	Quantity used for energy recovery on-site	
8.3.A	Quantity used for energy recovery off-site	
8.3.B	Quantity used for energy recovery off-site	
8.3.C	Quantity used for energy recovery off-site	
8.3.D	Quantity used for energy recovery off-site	
8.4.A	Quantity recycled on-site	
8.4.B	Quantity recycled on-site	
8.4.C	Quantity recycled on-site	
8.4.D	Quantity recycled on-site	
8.5.A	Quantity recycled off-site	
8.5.B	Quantity recycled off-site	
8.5.C	Quantity recycled off-site	
8.5.D	Quantity recycled off-site	
8.6.A	Quantity treated on-site	
8.6.B	Quantity treated on-site	
8.6.C	Quantity treated on-site	
8.6.D	Quantity treated on-site	
8.7.A	Quantity treated off-site	
8.7.B	Quantity treated off-site	
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