THE ENVIRONMENTAL QUALITY COMPANY ®

Generator Approval Notification

April 4, 2006

Customer: EQ INDUSTRIAL SERVICES, INC.
Fax: (734) 547-2502

BOB ZARB
DOUBLE EAGLE
ATTN: CHRIS MCBEE
3000 MILLER ROAD
DEARBORN, MI 48120

This Generator Approval Notification acknowledges the acceptability of waste material(s) into the EQ environmental protection facility identified below and ensures that this facility has the appropriate permit(s) issued by federal and state regulatory agencies to properly transport, treat, and/or dispose of the waste material(s).

EQ FACILITY: EQ Detroit, Inc. (MID980991566)
1923 Frederick, Detroit, MI 48211

Approval Number: BF04169

Generator EPA ID: MID981092190 **Expires On:** 03/01/2005
Waste Common Name: SODIUM HYDROXIDE / DIRT / OIL
Comments:

Primary Waste Code: D002
Secondary Waste Codes: D007

The Approval(s) listed above are based upon characterization information supplied to EQ by the Customer and the generator (if other than the Customer). The Customer is ultimately responsible for the accuracy and completeness of all such information, whether provided by the Customer or the generator. The Customer must notify the EQ Resource Team immediately upon knowledge of any changes to this information. This Approval and all wastes which are transported, delivered, or tendered to EQ under this Approval shall be subject to the attached Standard Terms and Conditions.

The Approval(s) will expire on the date(s) noted. Any new Approvals obtained from EQ on future business will be valid for a period of one (1) year from the date of issuance. Within 60 days of the Approval Expiration Date, you will be notified of the requirements for recertification.

BF04169

Tracking # 21

WASTE CHARACTERIZATION REPORT

☐ *I authorize EQ – The Environmental Quality Company to choose the appropriate method of waste management, from the technologies offered, at the EQ facilities identified below.*

☐ **Michigan Disposal Waste Treatment Plant** (Stabilization and Treatment)	49350 N. I-94 Service Drive, Belleville, MI 48111 Phone: 800-592-5489 Fax: 800-592-5329	EPA ID # MID 000 724 831
☐ **Wayne Disposal, Inc. Site #2 Landfill** (Hazardous & Chemical Waste Landfill)	49350 N. I-94 Service Drive, Belleville, MI 48111 Phone: 800-592-5489 Fax: 800-592-5329	EPA ID # MID 048 090 633
☒ **EQ Detroit, Inc.** (Stabilization, Wastewater Treatment)	1923 Frederick Street, Detroit, MI 48211 Phone: (313) 923-0080 Fax: 313-923-3375	EPA ID # MID 980 991 566
☐ **EQ Resource Recovery, Inc.** (Solvent Recycling, Fuel Blending, WW Treatment)	36345 Van Born Road, Romulus, MI 48174 Phone: 866-373-8357 Fax: 734-326-4033	EPA ID # MID 060 975 844
☐ **EQ North Carolina** (Stabilization, Treatment, Labpack Decommissioning)	1005 Investment Blvd, Apex, NC 27502 Phone: 919-363-4700 Fax: 919-363-4714	EPA ID # NCD 982 170 292
☐ **EQ Florida, Inc.** (Drum Consolidation, Labpack Decommissioning)	7202 East 8th Ave, Tampa, FL 33619 Phone: 813-623-5463 Fax: 813-628-0842	EPA ID # FLD 981 932 494
☐ **EQ Transfer & Processing** (Drum Transfer/Non-Hazardous Waste Processing)	1010 Old Rawsonville Rd., Ypsilanti, MI 48198 Phone: 734-547-1000 Fax: 734-480-9195	EPA ID # MIR 000 033 969 EPA ID # MIO 000 131 292
☐ **EQ Indianapolis** (Drum Transfer/Non-Hazardous Waste Processing)	4000 West 10th Street, Indianapolis, IN 46222 Phone: 317-247-7160 Fax: 317-247-7170	EPA ID # MIO 000 131 292
☐ **EQ Atlanta** (Drum Transfer/Non-Hazardous Waste Processing)	5600 Fulton Industrial Blvd SW, Atlanta, GA 30336 Phone: 404-494-3520 Fax: 404-494-3560	EPA ID # MIO 000 131 292
☐ **EQ Augusta, Inc.** (Wastewater Treatment)	3920 Goshen Industrial Blvd, Augusta, GA 30906 Phone: 706-771-9100 Fax: 706-771-9124	EPA ID # GAR 000 011 817

Waste Common Name:

Section 1 – Generator & Customer Information

SIC/NAICS* _____

Generator EPA ID # MID 981092 190

Generator Double Eagle Steel Coatings

Facility Address 3000 Miller Road

City Dearborn State MI Zip _____

County Wayne

Mailing Address SAME

City _____ State _____ Zip _____

Generator Contact Mark Gosnick

Title Environmental

Phone 313-203-9800 Fax 313-203-9705

*For a list of NAICS codes, please refer to Section 9 of the EQ Resource Guide.

Internal Use Only: EQ Division _____

EQ Customer No. 4077

Invoicing Company EQRS

Address _____

City _____ State _____ Zip _____

Country _____

Invoicing Contact _____

Phone _____ Fax _____

Technical Contact _____

Phone _____ Fax _____

Mobile _____ Pager _____

E-mail _____

Section 2 – Shipping & Packaging Information

2.1) Shipping Volume & Frequency 6000-12,000 gal.

☐ One Time Only ☐ Year ☐ Quarter ☒ Month

2.2) DOT Shipping Name RQ

Waste Corrosive Liquid, N.O.S. Sodium Hydroxide

2.3) Is this waste surcharge exempt? ☐ Yes ☒ No

If yes, please attach a surcharge exemption form, found in Section 2 of the EQ Resource Guide.

2.4) Packaging **(check all that apply)**

☐ Bulk Solid (Yd³ < 2000 lbs/yd³)

☐ Bulk Solid (Ton >2000 lbs/yd³)

☒ Bulk Liquids (Gallon)

☐ Totes, Size _____

☐ Cubic Yard Boxes/Bags

☐ Drums

☐ Other (palletized, 5 gal. Pail, etc.) _____

Quoted bulk disposal charges for solid materials will be billed by the cubic yard, if the waste density is less than 2,000lbs./cubic yard. If waste density is greater than 2,000 lbs./cubic yard, then bulk disposal charges will be billed by the ton, regardless of the approved container.

© EQ-The Environmental Quality Company

Section 3 – Physical Characteristics

3.1) Color Brownish Purple 3.2) Odor mild

3.3) Does this waste contain any "Potentially Odorous Constituents" as defined in the EQ Resource Guide? (Section 3) ☐ Yes ☒ No

3.4) Physical State at 70°F: ☐ Solid ☐ Dust/Powder ☒ Liquid ☐ Sludge

3.5) What is the pH of this waste? ☐ ≤2 ☐ 2.1-4.9 ☐ 5-10 ☐ 10.1-12.4 ☒ ≥12.5

3.6) What is the flash point of this waste? ☐ <90°F ☐ 90-140°F ☐ 140-199°F ☒ >200°F

3.7) Does this waste contain? (check all that apply) ☐ None ☒ Free Liquids ☒ Oily Residue ☐ Metal Fines

☐ Biodegradable Sorbants ☐ Amines ☐ Ammonia ☐ Dioxins ☐ Furans ☐ Biohazard

☐ Shock Sensitive Waste ☐ Reactive Waste ☐ Radioactive Waste ☐ Explosives ☐ Pyrophoric Waste ☐ Isocyanates

☐ Asbestos – non-friable ☐ Asbestos – friable

Section 4 – Waste Composition and Generating Process

4.1) Describe the physical composition of the waste (i.e., soil, water, PPE, debris, key chemical compounds, etc.)

Sodium Hydroxide	90 to 95 %		oil	1 to 3 %	
Dirt Sediment	1 to 5 %			to %	

Total: 100%

4.2) Provide a *detailed* description of the process generating this waste (attach flow diagram if available).

Section 5 – Hazardous or Non-Hazardous Waste?

Please refer to Section 5 of the EQ Resource Guide for a list of waste codes

As determined by 40 CFR, Part 261 and State Rules: **Please list applicable waste code(s):**

5.1) Is this an EPA RCRA listed hazardous waste (F, K, P or U)? ☐ Yes ☒ No

5.2) Is this an EPA RCRA characteristic hazardous waste (D001-D043)? ☒ Yes ☐ No D002

5.3) Do any State Waste Codes apply? ☒ Yes ☐ No D007

5.4) Is this waste intended for wastewater treatment? ☒ Yes* ☐ No

If you answered 'no' to 5.1, 5.2, and 5.3, please skip to Section 7. *If you answered 'yes' to 5.4, please attach the Waste Characterization Report Addendum found in Section 7 of the EQ Resource Guide.

Section 6 – Hazardous Wastes

6.1) Does this waste exceed Land Disposal Restriction levels? ☐ Yes ☐ No

6.1a) If this waste stream is greater than 50% soil, does it meet the alternative soil treatment standards of 40 CFR 268.49? ☐ Yes ☐ No

6.1b) Does this waste contain greater than 50% debris, by volume? (Debris is greater than 2.5 inches in size.) ☐ Yes ☐ No

6.2) Is the waste an oxidizer (D001)? ☐ Yes ☐ No

6.3) Does this waste contain reactive cyanide ≥250 ppm (D003)? ☐ Yes ☐ No

6.4) Does this waste contain reactive sulfide ≥ 500 ppm (D003)? ☐ Yes ☐ No

6.5) Please indicate which constituent concentrations are below or above the regulatory level. Please indicate the basis used in the determination. Either "Below" or "Above" MUST be checked for each constituent.

Based On: ☒ Generator Knowledge ☒ Analysis* ☐ MSDS* *Please attach a copy.

Code		Regulatory Level TCLP (mg/l)	Concentration (if above)	Code		Regulatory Level TCLP (mg/l)	Concentration (if above)
D004	Arsenic	5	☒ Below ☐ Above	D024	m-Cresol	200	☒ Below ☐ Above
D005	Barium	100	☒ Below ☐ Above	D025	p-Cresol	200	☒ Below ☐ Above
D006	Cadmium	1	☒ Below ☐ Above	D026	Cresols	200	☒ Below ☐ Above
D007	Chromium	5	☒ Below ☐ Above	D027	1,4-Dichlorobenzene	7.5	☒ Below ☐ Above
D008	Lead	5	☒ Below ☐ Above	D028	1,2-Dicholoroethane	0.5	☒ Below ☐ Above
D009	Mercury	0.2	☒ Below ☐ Above	D029	1,1-Dichloroethylene	0.7	☒ Below ☐ Above
D010	Selenium	1	☒ Below ☐ Above	D030	2,4-Dinitrotoluene	0.13	☒ Below ☐ Above
D011	Silver	5	☒ Below ☐ Above	D031	Heptachlor	0.008	☒ Below ☐ Above
D012	Endrin	0.02	☒ Below ☐ Above	D032	Hexachlorobenzene	0.13	☒ Below ☐ Above
D013	Lindane	0.4	☒ Below ☐ Above	D033	Hexachlorobutadiene	0.5	☒ Below ☐ Above
D014	Methoxychlor	10	☒ Below ☐ Above	D034	Hexachloroethane	3.0	☒ Below ☐ Above
D015	Toxaphene	0.5	☒ Below ☐ Above	D035	Methyl Ethyl Ketone	200	☒ Below ☐ Above
D016	2,4-D	10	☒ Below ☐ Above	D036	Nitrobenzene	2	☒ Below ☐ Above
D017	2,4,5-TP (Silvex)	1	☒ Below ☐ Above	D037	Pentachlorophenol	100	☒ Below ☐ Above
D018	Benzene	0.5	☒ Below ☐ Above	D038	Pyridine	5	☒ Below ☐ Above
D019	Carbon Tetrachloride	0.5	☒ Below ☐ Above	D039	Tetrachloroethylene	0.7	☒ Below ☐ Above
D020	Chlordane	0.03	☒ Below ☐ Above	D040	Trichloroethylene	0.5	☒ Below ☐ Above
D021	Chlorobenzene	100	☒ Below ☐ Above	D041	2,4,5-Trichlorophenol	400	☒ Below ☐ Above
D022	Chloroform	6.0	☒ Below ☐ Above	D042	2,4,6-Trichlorophenol	2	☒ Below ☐ Above
D023	o-Cresol	200	☒ Below ☐ Above	D043	Vinyl Chloride	0.2	☒ Below ☐ Above

6.6) If this is a characteristic hazardous waste, does it contain underlying hazardous constituents? ☐ Yes ☐ No

If yes, please list the constituents in Section 11.

Section 7 – Non-Hazardous Wastes

For a complete list of non-hazardous waste codes, please refer to Section 7 of the EQ Resource Guide

Please list applicable waste code:

7.1) Is this a Michigan non-hazardous liquid industrial waste? ☐ Yes ☒ No
7.2) Is this a Universal waste? ☐ Yes ☒ No
7.3) Is this a Recyclable Commodity? (e.g.: computer monitors, free mercury, etc.) ☐ Yes ☒ No
7.4) Is this waste a recoverable petroleum product? ☐ Yes* ☒ No
7.5) Is this waste used oil as defined by 40 CFR Part 279? ☐ Yes* ☒ No

If you answered 'yes' to questions 7.4 or 7.5 please attach the Waste Characterization Report Addendum found in Section 7 of the EQ Resource Guide.

Section 8 – TSCA Information

8.1) What is the concentration of PCBs in the waste? ☒ None ☐ 0-5 ppm ☐ 6-49 ppm ☐ 50-499 ppm ☐ 500+ ppm
8.2) Does the waste contain PCB contamination from a source with a concentration ≥ 50 ppm? ☐ Yes ☒ No
If you answered "no" to 8.1 and 8.2, please skip to Section 9.
8.3) Has this waste been processed into a non-liquid form? ☐ Yes ☐ No
If yes, what was the concentration of PCBs prior to processing? ☐ N/A ☐ 0-499 ppm ☐ 500+ ppm
8.4) Is the non-liquid PCB waste in the form of soil, rags, debris, or other contaminated media? ☐ Yes ☐ No
8.5) Are you a PCB capacitor manufacturer or a PCB equipment manufacturer? ☐ Yes ☐ No
8.6) Has the PCB Article (e.g., transformer, hydraulic machine, PCB-contaminated electrical equipment) been drained/flushed of all PCBs and decontaminated in accordance with 40 CFR 761.60(b)? ☐ N/A ☐ Yes ☐ No

Section 9 – Clean Air Act Information

NESHAP SIC*		
2812	2836	2875
2813	2841	2879
2816	2842	2891
2819	2843	2892
2821	2844	2893
2822	2851	2895
2823	2861	2899
2824	2865	2911
2833	2869	3312
2834	2873	4953
2835	2874	9511

9.1) Is this waste subject to regulation under 40 CFR, Part 63, Subpart DD or 40 CFR, Part 264, Subpart CC (RCRA)? ☐ Yes ☐ No
(Does the waste contain >500 ppm Volatile Organic Hazardous Air Pollutants – VOHAP's or Volalite Organic Compounds – VOC's?)
For a complete list of VOHAP's, please see Section 11 of the EQ Resource Guide
9.2) Does this waste stream contain Benzene? ☐ Yes ☐ No
If you answered "no" to 9.2, please skip to Section 10.
9.3) Does the waste stream come from a facility with one of the SIC codes listed under the NESHAP? ☐ Yes ☐ No
9.4) Is the generating source of this waste stream a facility with Total Annual Benzene (TAB) ≥10 Mg/year? ☐ Yes ☐ No
For assistance in calculating the TAB, please see the TAB Worksheet in Section 9 of the EQ Resource Guide.
If you answered "no" to question 9.3 and 9.4, please skip to Section 10.
9.5) Does the waste contain >10% water? ☐ Yes ☐ No
9.6) What is the TAB quantity for your facility? _____ Mg/Year
9.7) Does the waste contain >1.0 mg/kg total Benzene? ☐ Yes ☐ No
9.8) What is the total Benzene concentration in your waste? _____ Percent or _____ ppmw.
(Do not use TCLP analytical results. Acceptable laboratory methods include 8020, 8240, 8260, 602 and 624.)
*For a list of NAICS codes, please refer to Section 9 of the EQ Resource Guide.

Section 10 – Fuel Blending Information

10.1) Is this waste intended for fuel blending? ☐ Yes* ☒ No
*If yes, Heat value (BTU/lb.) _____ Chlorine (%) _____ Water (%) _____ Solids (%) _____
10.2) Is this waste intended for reclamation? ☐ Yes ☒ No (5-Gallon Sample required for all reclaim waste streams)

Section 11 – Constituent Information

Please identify your waste constituents from these four categories: ***Underlying Hazardous Constituents (UHC's), Volatile Organic Hazardous Air Pollutants (VOHAP's), Volatile Organic Compounds (VOC's) and Toxic Release Inventory Constituents (TRI)***

Constituent	Concentration	UHC?	Constituent	Concentration	UHC?
		☐ Yes ☐ No			☐ Yes ☐ No
		☐ Yes ☐ No			☐ Yes ☐ No
		☐ Yes ☐ No			☐ Yes ☐ No
		☐ Yes ☐ No			☐ Yes ☐ No
		☐ Yes ☐ No			☐ Yes ☐ No

Please see Section 11 of the EQ Resource Guide for a list of UHC's, VOHAP's and VOC's. For a complete list of TRI constituents, please refer to 40 CFR 372.65.

Section 12 – Certification

I certify that all information (including attachments) is complete and factual and is an accurate representation of the known and suspected hazards, pertaining to the waste described herein. I authorize EQ's Resource Team to add supplemental information to the waste approval file, provided I am contacted and give verbal permission. I authorize EQ's Resource Team to obtain a sample from any waste shipment for purposes of verification and confirmation. I agree that, if EQ approves the waste described herein, all such wastes that are transported, delivered, or tendered to EQ by Generator or on Generator's behalf shall be subject to, and Generator shall be bound by, the attached Standard Terms and Conditions.

Generator Signature Mark Gorman Printed Name Mark Gorman

Company Double Eagle Title ENV. ENG Date 2/24/09

The generator's signature MUST appear on the EQ Waste Characterization Report. If the generator has authorized a third party to certify this document, a written notice (on generator letterhead) must accompany this submittal. Although the EQ Resource Team is authorized to make certain modifications to the information provided on this form, the addition or removal of waste codes and waste constituents must be documented by the generator.

February 27, 2004

Sample Number: 35126

Date Received: February 26,2004
Date Completed: February 27,2004

Customer: US LIQUIDS OF DETROIT/SALES
Address: 1923 FREDERICK STREET
DETROIT, MI 48211 US
Customer #: 294220

Contact: Mr. James Kreger
Phone: 313 923-0080
Fax: 313 923-3375

Sample Identification: Double Eagle - Sodium Hydroxide Sludge and Dirt 21

Description: Green Sludge

ATRACS #:

Sample was Analyzed: As Received and TCLP Extraction
Type of Analysis: Treatability and TCLP Metals

Methods: Taken from EPA SW-846, Standard Methods for Water and Wastewater, and/or ASTM

Test Description	Results	Reg. Limit	Units	Waste
Cobalt	< 0.10	---	ppm	
Copper	< 0.50	100	mg/L	001D
Zinc	< 0.50	500	mg/L	003D
Arsenic	< 0.50	5.00	mg/L	D004
Barium	< 0.50	100	mg/L	D005
Cadmium	< 0.10	1.00	mg/L	D006
Chromium	< 0.50	5.00	mg/L	D007
Lead	< 0.50	5.00	mg/L	D008
Mercury	< 0.10	0.200	mg/L	D009
Selenium	< 0.50	1.00	mg/L	D010
Silver	< 0.10	5.00	mg/L	D011
Iron	< 0.50	---	ppm	
Nickel	< 0.50	---	mg/L	
Antimony	< 0.10	---	ppm	
Titanium	< 0.10	---	ppm	
Vanadium	< 0.10	---	ppm	

Reviewed By: Kathryn McIntyre

Manager:

THE ENVIRONMENTAL QUALITY COMPANY ®

Generator Approval Notification

April 4, 2006

Customer: EQ INDUSTRIAL SERVICES, INC.
Fax: (734) 547-2502

BOB ZARB
DOUBLE EAGLE
ATTN: CHRIS MCBEE
3000 MILLER ROAD
DEARBORN, MI 48120

This Generator Approval Notification acknowledges the acceptability of waste material(s) into the EQ environmental protection facility identified below and ensures that this facility has the appropriate permit(s) issued by federal and state regulatory agencies to properly transport, treat, and/or dispose of the waste material(s).

EQ FACILITY: EQ Detroit, Inc. (MID980991566)
1923 Frederick, Detroit, MI 48211

Approval Number: CF04400

Generator EPA ID: MID981092190 **Expires On:** 03/12/2005
Waste Common Name: HAZARDOUS ALLOY TANKS
Comments:

Primary Waste Code: D002
Secondary Waste Codes: D007

The Approval(s) listed above are based upon characterization information supplied to EQ by the Customer and the generator (if other than the Customer). The Customer is ultimately responsible for the accuracy and completeness of all such information, whether provided by the Customer or the generator. The Customer must notify the EQ Resource Team immediately upon knowledge of any changes to this information. This Approval and all wastes which are transported, delivered, or tendered to EQ under this Approval shall be subject to the attached Standard Terms and Conditions.

The Approval(s) will expire on the date(s) noted. Any new Approvals obtained from EQ on future business will be valid for a period of one (1) year from the date of issuance. Within 60 days of the Approval Expiration Date, you will be notified of the requirements for recertification.

CF04400

WASTE CHARACTERIZATION REPORT

Tracking # 28

☐ *I authorize EQ – The Environmental Quality Company to choose the appropriate method of waste management, from the technologies offered, at the EQ facilities identified below.*

☒ **Michigan Disposal Waste Treatment Plant** (Stabilization and Treatment)	49350 N. I-94 Service Drive, Belleville, MI 48111 Phone: 800-592-5489 Fax: 800-592-5329	EPA ID # MID 000 724 831
☐ **Wayne Disposal, Inc. Site #2 Landfill** (Hazardous & Chemical Waste Landfill)	49350 N. I-94 Service Drive, Belleville, MI 48111 Phone: 800-592-5489 Fax: 800-592-5329	EPA ID # MID 048 090 633
☒ **EQ Detroit, Inc.** (Stabilization, Wastewater Treatment)	1923 Frederick Street, Detroit, MI 48211 Phone: (313) 923-0080 Fax: 313-923-3375	EPA ID # MID 980 991 566
☐ **EQ Resource Recovery, Inc.** (Solvent Recycling, Fuel Blending, WW Treatment)	36345 Van Born Road, Romulus, MI 48174 Phone: 866-373-8357 Fax: 734-326-4033	EPA ID # MID 060 975 844
☐ **EQ North Carolina** (Stabilization, Treatment, Labpack Decommissioning)	1005 Investment Blvd, Apex, NC 27502 Phone: 919-363-4700 Fax: 919-363-4714	EPA ID # NCD 982 170 292
☐ **EQ Florida, Inc.** (Drum Consolidation, Labpack Decommissioning)	7202 East 8th Ave, Tampa, FL 33619 Phone: 813-623-5463 Fax: 813-628-0842	EPA ID # FLD 981 932 494
☐ **EQ Transfer & Processing** (Drum Transfer/Non-Hazardous Waste Processing)	1010 Old Rawsonville Rd., Ypsilanti, MI 48198 Phone: 734-547-1000 Fax: 734-480-9195	EPA ID # MIR 000 033 969 EPA ID # MIO 000 131 292
☐ **EQ Indianapolis** (Drum Transfer/Non-Hazardous Waste Processing)	4000 West 10th Street, Indianapolis, IN 46222 Phone: 317-247-7160 Fax: 317-247-7170	EPA ID # MIO 000 131 292
☐ **EQ Atlanta** (Drum Transfer/Non-Hazardous Waste Processing)	5600 Fulton Industrial Blvd SW, Atlanta, GA 30336 Phone: 404-494-3520 Fax: 404-494-3560	EPA ID # MIO 000 131 292
☐ **EQ Augusta, Inc.** (Wastewater Treatment)	3920 Goshen Industrial Blvd, Augusta, GA 30906 Phone: 706-771-9100 Fax: 706-771-9124	EPA ID # GAR 000 011 817

Waste Common Name: Alloy Tank

Section 1 – Generator & Customer Information

SIC/NAICS* _____

Generator EPA ID # _____

Generator Double Eagle Steel Inc.

Facility Address 3000 Miller Rd.

City Dearborn State MI Zip _____

County WAYNE

Mailing Address _____

City _____ State _____ Zip _____

Generator Contact Mark Gorrich

Title Environmental

Phone 313-203-9800 Fax 313-203-9785

*For a list of NAICS codes, please refer to Section 9 of the EQ Resource Guide.

Internal Use Only: EQ Division _____

EQ Customer No. _____

Invoicing Company EQDS

Address _____

City _____ State _____ Zip _____

Country _____

Invoicing Contact _____

Phone _____ Fax _____

Technical Contact _____

Phone _____ Fax _____

Mobile _____ Pager _____

E-mail _____

Section 2 – Shipping & Packaging Information

2.1) Shipping Volume & Frequency 2 - Drums

☐ One Time Only ☐ Year ☒ Quarter ☐ Month

2.2) DOT Shipping Name EQ. WASTE Corrosive N.O.S.

2.3) Is this waste surcharge exempt? ☐ Yes ☒ No

If yes, please attach a surcharge exemption form, found in Section 2 of the EQ Resource Guide.

2.4) Packaging (check all that apply)

☐ Bulk Solid (Yd^3 < 2000 lbs/yd^3)

☐ Bulk Solid (Ton >2000 lbs/yd^3)

☐ Bulk Liquids (Gallon)

☐ Totes, Size _____

☐ Cubic Yard Boxes/Bags

☒ Drums

☐ Other (palletized, 5 gal. Pail, etc.) _____

Quoted bulk disposal charges for solid materials will be billed by the cubic yard, if the waste density is less than 2,000lbs./cubic yard. If waste density is greater than 2,000 lbs./cubic yard, then bulk disposal charges will be billed by the ton, regardless of the approved container.

Section 3 – Physical Characteristics

3.1) Color: Black 3.2) Odor: Slight

3.3) Does this waste contain any "Potentially Odorous Constituents" as defined in the EQ Resource Guide? (Section 3) ☐ Yes ☒ No

3.4) Physical State at 70°F: ☐ Solid ☐ Dust/Powder ☒ Liquid ☐ Sludge

3.5) What is the pH of this waste? ☐ ≤2 ☒ 2.1-4.9 ☐ 5-10 ☐ 10.1-12.4 ☐ ≥12.5

3.6) What is the flash point of this waste? ☐ <90°F ☐ 90-140°F ☐ 140-199°F ☒ >200°F

3.7) Does this waste contain? (check all that apply) ☐ None ☒ Free Liquids ☒ Oily Residue ☐ Metal Fines

☐ Biodegradable Sorbants ☐ Amines ☐ Ammonia ☐ Dioxins ☐ Furans ☐ Biohazard

☐ Shock Sensitive Waste ☐ Reactive Waste ☐ Radioactive Waste ☐ Explosives ☐ Pyrophoric Waste ☐ Isocyanates

☐ Asbestos – non-friable ☐ Asbestos – friable

Section 4 – Waste Composition and Generating Process

4.1) Describe the physical composition of the waste (i.e., soil, water, PPE, debris, key chemical compounds, etc.)

Oil	60 to 75 %	Hydrocarbon Acids	1 to 4 %
Zinc	2 to 6 %	Citric Acids	0 to 0.1 %
Iron Chloride	2 6		

Total: 100%

4.2) Provide a *detailed* description of the process generating this waste (attach flow diagram if available).

Skimmer on Alloy tank to remove oily residue.

Section 5 – Hazardous or Non-Hazardous Waste?

Please refer to Section 5 of the EQ Resource Guide for a list of waste codes

As determined by 40 CFR, Part 261 and State Rules: **Please list applicable waste code(s):**

5.1) Is this an EPA RCRA listed hazardous waste (F, K, P or U)? ☐ Yes ☒ No

5.2) Is this an EPA RCRA characteristic hazardous waste (D001-D043)? ☒ Yes ☐ No

5.3) Do any State Waste Codes apply? ☒ Yes ☒ No D002, D007

5.4) Is this waste intended for wastewater treatment? ☐ Yes* ☒ No

Oily at Al Gordon.

*If you answered 'no' to 5.1, 5.2, and 5.3, please skip to Section 7. *If you answered 'yes' to 5.4, please attach the Waste Characterization Report Addendum found in Section 7 of the EQ Resource Guide.*

Section 6 – Hazardous Wastes

6.1) Does this waste exceed Land Disposal Restriction levels? See 5.3 ☒ Yes ☐ No

Breakdown #1

6.1a) If this waste stream is greater than 50% soil, does it meet the alternative soil treatment standards of 40 CFR 268.49? ☐ Yes ☒ No

6.1b) Does this waste contain greater than 50% debris, by volume? (Debris is greater than 2.5 inches in size.) ☐ Yes ☒ No

6.2) Is the waste an oxidizer (D001)? See breakdown #1 ☐ Yes ☒ No

6.3) Does this waste contain reactive cyanide ≥ 250 ppm (D003)? See analytical ☐ Yes ☒ No

6.4) Does this waste contain reactive sulfide ≥ 500 ppm (D003)? ☐ Yes ☒ No

6.5) Please indicate which constituent concentrations are below or above the regulatory level. Please indicate the basis used in the determination. Either "Below" or "Above" MUST be checked for each constituent.

Gt per Al Gordon 3/11/04

Based On: ☒ Generator Knowledge ☒ Analysis* ☐ MSDS* *Please attach a copy.

Code		Regulatory Level TCLP (mg/l)	Concentration (if above)
D004	Arsenic	5	☒ Below ☐ Above
D005	Barium	100	☒ Below ☐ Above
D006	Cadmium	1	☐ Below ☒ Above 0.14
D007	Chromium	5	☐ Below ☒ Above 6.9
D008	Lead	5	☒ Below ☐ Above
D009	Mercury	0.2	☐ Below ☒ Above 0.0010
D010	Selenium	1	☒ Below ☐ Above
D011	Silver	5	☒ Below ☐ Above
D012	Endrin	0.02	☐ Below ☐ Above
D013	Lindane	0.4	☐ Below ☐ Above
D014	Methoxychlor	10	☐ Below ☐ Above
D015	Toxaphene	0.5	☐ Below ☐ Above
D016	2,4-D	10	☐ Below ☐ Above
D017	2,4,5-TP (Silvex)	1	☐ Below ☐ Above
D018	Benzene	0.5	☐ Below ☐ Above
D019	Carbon Tetrachloride	0.5	☐ Below ☐ Above
D020	Chlordane	0.03	☐ Below ☐ Above
D021	Chlorobenzene	100	☐ Below ☐ Above
D022	Chloroform	6.0	☐ Below ☐ Above
D023	o-Cresol	200	☐ Below ☐ Above

Code		Regulatory Level TCLP (mg/l)	Concentration (if above)
D024	m-Cresol	200	☐ Below ☐ Above
D025	p-Cresol	200	☐ Below ☐ Above
D026	Cresols	200	☐ Below ☐ Above
D027	1,4-Dichlorobenzene	7.5	☐ Below ☐ Above
D028	1,2-Dicholoroethane	0.5	☐ Below ☐ Above
D029	1,1-Dichloroethylene	0.7	☐ Below ☐ Above
D030	2,4-Dinitrotoluene	0.13	☐ Below ☐ Above
D031	Heptachlor	0.008	☐ Below ☐ Above
D032	Hexachlorobenzene	0.13	☐ Below ☐ Above
D033	Hexachlorobutadiene	0.5	☐ Below ☐ Above
D034	Hexachloroethane	3.0	☐ Below ☐ Above
D035	Methyl Ethyl Ketone	200	☐ Below ☐ Above
D036	Nitrobenzene	2	☐ Below ☐ Above
D037	Pentachlorophenol	100	☐ Below ☐ Above
D038	Pyridine	5	☐ Below ☐ Above
D039	Tetrachloroethylene	0.7	☐ Below ☐ Above
D040	Trichloroethylene	0.5	☐ Below ☐ Above
D041	2,4,5-Trichlorophenol	400	☐ Below ☐ Above
D042	2,4,6-Trichlorophenol	2	☐ Below ☐ Above
D043	Vinyl Chloride	0.2	☐ Below ☐ Above

6.6) If this is a characteristic hazardous waste, does it contain underlying hazardous constituents? ☒ Yes ☐ No

If yes, please list the constituents in Section 11.

See attached analytical

N/a

Section 7 – Non-Hazardous Wastes

For a complete list of non-hazardous waste codes, please refer to Section 7 of the EQ Resource Guide

Please list applicable waste code:

7.1) Is this a Michigan non-hazardous liquid industrial waste? ☐ Yes ☐ No
7.2) Is this a Universal waste? ☐ Yes ☐ No
7.3) Is this a Recyclable Commodity? (e.g.: computer monitors, free mercury, etc.) ☐ Yes ☐ No
7.4) Is this waste a recoverable petroleum product? ☐ Yes* ☐ No
7.5) Is this waste used oil as defined by 40 CFR Part 279? ☐ Yes* ☐ No

If you answered 'yes' to questions 7.4 or 7.5 please attach the Waste Characterization Report Addendum found in Section 7 of the EQ Resource Guide.

Section 8 – TSCA Information

8.1) What is the concentration of PCBs in the waste? ☒ None ☐ 0-5 ppm ☐ 6-49 ppm ☐ 50-499 ppm ☐ 500+ ppm
8.2) Does the waste contain PCB contamination from a source with a concentration ≥ 50 ppm? ☐ Yes ☒ No
If you answered "no" to 8.1 and 8.2, please skip to Section 9.
8.3) Has this waste been processed into a non-liquid form? ☐ Yes ☐ No
If yes, what was the concentration of PCBs prior to processing? ☐ N/A ☐ 0-499 ppm ☐ 500+ ppm
8.4) Is the non-liquid PCB waste in the form of soil, rags, debris, or other contaminated media? ☐ Yes ☐ No
8.5) Are you a PCB capacitor manufacturer or a PCB equipment manufacturer? ☐ Yes ☐ No
8.6) Has the PCB Article (e.g., transformer, hydraulic machine, PCB-contaminated electrical equipment) been drained/flushed of all PCBs and decontaminated in accordance with 40 CFR 761.60(b)? ☐ N/A ☐ Yes ☐ No

Section 9 – Clean Air Act Information

NESHAP SIC*		
2812	2836	2875
2813	2841	2879
2816	2842	2891
2819	2843	2892
2821	2844	2893
2822	2851	2895
2823	2861	2899
2824	2865	2911
2833	2869	3312
2834	2873	4953
2835	2874	9511

9.1) Is this waste subject to regulation under 40 CFR, Part 63, Subpart DD or 40 CFR, Part 264, Subpart CC (RCRA)? ☐ Yes ☐ No
(Does the waste contain >500 ppm Volatile Organic Hazardous Air Pollutants – VOHAP's or Volalite Organic Compounds – VOC's?)
For a complete list of VOHAP's, please see Section 11 of the EQ Resource Guide
9.2) Does this waste stream contain Benzene? ☐ Yes ☐ No
If you answered "no" to 9.2, please skip to Section 10.
9.3) Does the waste stream come from a facility with one of the SIC codes listed under the NESHAP? ☐ Yes ☐ No
9.4) Is the generating source of this waste stream a facility with Total Annual Benzene (TAB) ≥10 Mg/year? ☐ Yes ☐ No
For assistance in calculating the TAB, please see the TAB Worksheet in Section 9 of the EQ Resource Guide.
If you answered "no" to question 9.3 and 9.4, please skip to Section 10.
9.5) Does the waste contain >10% water? ☐ Yes ☐ No
9.6) What is the TAB quantity for your facility? _____ Mg/Year
9.7) Does the waste contain >1.0 mg/kg total Benzene? ☐ Yes ☐ No
9.8) What is the total Benzene concentration in your waste? _____ Percent or _____ ppmw.
(Do not use TCLP analytical results. Acceptable laboratory methods include 8020, 8240, 8260, 602 and 624.)
*For a list of NAICS codes, please refer to Section 9 of the EQ Resource Guide.

Section 10 – Fuel Blending Information

10.1) Is this waste intended for fuel blending? ☐ Yes* ☒ No
*If yes, Heat value (BTU/lb.) _____ Chlorine (%) _____ Water (%) _____ Solids (%) _____
10.2) Is this waste intended for reclamation? ☐ Yes ☐ No (5-Gallon Sample required for all reclaim waste streams).

Section 11 – Constituent Information

Please identify your waste constituents from these four categories: *Underlying Hazardous Constituents (UHC's), Volatile Organic Hazardous Air Pollutants (VOHAP's), Volatile Organic Compounds (VOC's) and Toxic Release Inventory Constituents (TRI)*

See attached analytical

Constituent	Concentration	UHC?	Constituent	Concentration	UHC?
		☐ Yes ☐ No			☐ Yes ☐ No
		☐ Yes ☐ No			☐ Yes ☐ No
		☐ Yes ☐ No			☐ Yes ☐ No
		☐ Yes ☐ No			☐ Yes ☐ No
		☐ Yes ☐ No			☐ Yes ☐ No

Please see Section 11 of the EQ Resource Guide for a list of UHC's, VOHAP's and VOC's. For a complete list of TRI constituents, please refer to 40 CFR 372.65.

Section 12 – Certification

I certify that all information (including attachments) is complete and factual and is an accurate representation of the known and suspected hazards, pertaining to the waste described herein. I authorize EQ's Resource Team to add supplemental information to the waste approval file, provided I am contacted and give verbal permission. I authorize EQ's Resource Team to obtain a sample from any waste shipment for purposes of verification and confirmation. I agree that, if EQ approves the waste described herein, all such wastes that are transported, delivered, or tendered to EQ by Generator or on Generator's behalf shall be subject to, and Generator shall be bound by, the attached Standard Terms and Conditions.

Generator Signature Mark Gornick Printed Name Mark Gornick

Company Double Eagle Steel Title Env. Eng. Date 2/24/04

The generator's signature MUST appear on the EQ Waste Characterization Report. If the generator has authorized a third party to certify this document, a written notice (on generator letterhead) must accompany this submittal. Although the EQ Resource Team is authorized to make certain modifications to the information provided on this form, the addition or removal of waste codes and waste constituents must be documented by the generator.

© EQ-The Environmental Quality Company

22345 Roethel Drive
Novi, MI 48375
248.344.1770
Fax 248.344.2654

Clayton®
GROUP SERVICES

February 19, 2004

Mark Gornick
DOUBLE EAGLE STEEL COATING COMPANY
3000 Miller Road
Dearborn, MI 48120-

Clayton Work Order No. 04020459

Reference:

Dear Mark Gornick:

Clayton Group Services received 1 sample on 2/13/2004 for the analyses presented in the following report.

Enclosed is a copy of the Chain-of-Custody record, acknowledging receipt of these samples. Please note that any unused portion of the samples will be discarded 30 days after the date of this report, unless you have requested otherwise.

This material is confidential and is intended solely for the person to whom it is addressed. If this is received in error, please contact the number provided below.

We appreciate the opportunity to assist you. If you have any questions concerning this report, please contact a Client Services Representative at (800) 806-5887.

Sincerely,

Karen Coonan
Client Services Representative

cc:

Clayton GROUP SERVICES

CASE NARRATIVE

Date: *19-Feb-04*

CLIENT: DOUBLE EAGLE STEEL COATING COMPANY

Project:

Work Order No 04020459

Analytical comments:
The Clayton Novi Laboratory is NELAP and AIHA accredited. These accreditations require that we provide the following information on each report: As an analytical result progresses above the reporting limit (RL), it has less variability than a result reported at, or near, the RL.

Samples were received at the laboratory at an average temperature of 1.8°C.

ANALYTICAL RESULTS

Clayton GROUP SERVICES

Date: *19-Feb-04*

CLIENT: DOUBLE EAGLE STEEL COATING COMPANY
Client Sample ID: ALLOY TANK SKIMMING
Work Order No: 04020459
Tag Number:
Project:
Collection Date: 2/11/2004
Lab ID: 04020459-001B
Matrix: LEACHATE

Analyses	Result	Reporting Limit	Qual	Units	DF	Date Analyzed	Analyst
ICP METALS;LEACHATE: METHOD EPA 6010B							
Arsenic	ND	0.10		mg/L	1	2/17/2004	DH
Barium	ND	0.10		mg/L	1	2/17/2004	DH
Cadmium	0.14	0.050		mg/L	1	2/17/2004	DH
Chromium	6.9	0.10		mg/L	1	2/17/2004	DH
Lead	ND	0.10		mg/L	1	2/17/2004	DH
Selenium	ND	0.20		mg/L	1	2/17/2004	DH
Silver	ND	0.020		mg/L	1	2/17/2004	DH
MERCURY; LEACHED: METHOD EPA 7470A							
Mercury	0.0010	0.0010		mg/L	1	2/18/2004	RS

Qualifiers:

ND - Not Detected at the Reporting Limit (RL).
J - Analyte detected below the Reporting Limit
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
E - Value above quantitation range
T - Tentatively Identified Compound (TIC)

ANALYTICAL RESULTS

Clayton GROUP SERVICES

Date: *19-Feb-04*

CLIENT:	DOUBLE EAGLE STEEL COATING COMPANY	**Client Sample ID:**	ALLOY TANK SKIMMING
Work Order No:	04020459	**Tag Number:**	
Project:		**Collection Date:**	2/11/2004
Lab ID:	04020459-001C	**Matrix:**	WASTE

Analyses	Result	Reporting Limit	Qual	Units	DF	Date Analyzed	Analyst
IGNITABILITY; METHOD EPA 1010							
Ignitability	>200	0		°F	1	2/16/2004	MJR
PH; METHOD EPA 150.1							
pH	4.6	1.0		pH Units	1	2/18/2004 4:42:00	KAR
REACTIVE CYANIDE, EPA SW 846 CHAPTER 7.3.3.2							
Reactive Cyanide	ND	0.10		mg/L	1	2/17/2004	MJR
REACTIVE SULFIDE; EPA SW 846 CHAPTER 7.3.4.2							
Reactive Sulfide	ND	100		mg/L	1	2/17/2004	MJR

Qualifiers:

ND - Not Detected at the Reporting Limit (RL).
J - Analyte detected below the Reporting Limit
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
E - Value above quantitation range
T - Tentatively Identified Compound (TIC)

Clayton Group Services

Date: *19-Feb-04*

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 04020459
Project:

QC SUMMARY REPORT

Method Blank

Sample ID: MB-13522 | Batch ID: 13522 | Units: mg/L | Analysis Date 2/18/2004 | Prep Date: 2/17/2004
Client ID: | Run ID: ME_CE5E_040218A | SeqNo: 561116

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Mercury	ND	0.001									

Sample ID: lb | Batch ID: R47820 | Units: mg/L | Analysis Date 2/17/2004 | Prep Date:
Client ID: | Run ID: WC_MA7G_040217B | SeqNo: 560385

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Reactive Cyanide	ND	0.1									

Sample ID: lb | Batch ID: R47821 | Units: mg/L | Analysis Date 2/17/2004 | Prep Date:
Client ID: | Run ID: WC_MA7G_040217C | SeqNo: 560391

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Reactive Sulfide	ND	100									

Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

Clayton GROUP SERVICES

Clayton Group Services

Date: *19-Feb-04*

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 04020459
Project:

QC SUMMARY REPORT

Laboratory Control Spike

Sample ID: LCS-13522 | Batch ID: 13522 | Units: mg/L | Analysis Date 2/18/2004 | Prep Date: 2/17/2004
Client ID: | Run ID: ME_CE5E_040218A | SeqNo: 561117

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Mercury	0.00181	0.001	0.002	0	90.5	71.4	126	0			

Sample ID: lcs | Batch ID: R47820 | Units: mg/L | Analysis Date 2/17/2004 | Prep Date:
Client ID: | Run ID: WC_MA7G_040217B | SeqNo: 560386

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Reactive Cyanide	2.5	0.1	100	0	2.5	0.561	15	0			

Sample ID: lcs | Batch ID: R47821 | Units: mg/L | Analysis Date 2/17/2004 | Prep Date:
Client ID: | Run ID: WC_MA7G_040217C | SeqNo: 560392

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Reactive Sulfide	24.74	100	201.8	0	12.3	10.5	97.9	0			J

Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

Clayton GROUP SERVICES

Clayton Group Services

Date: *19-Feb-04*

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 04020459
Project:

QC SUMMARY REPORT
Sample Matrix Spike

Sample ID: 04020364-001B-MS | Batch ID: 13519 | Units: mg/L | Analysis Date 2/17/2004 | Prep Date: 2/17/2004
Client ID: | Run ID: ME_PE9I_040217C | SeqNo: 560652

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	4.74	0.1	5	0	94.8	82.5	120	0			
Barium	4.93	0.1	5	0.392	90.8	81.1	116	0			
Cadmium	4.31	0.05	5	0	86.2	81.6	115	0			
Chromium	4.58	0.1	5	0	91.6	80.9	112	0			
Lead	4.44	0.1	5	0	88.8	80.5	113	0			
Selenium	4.79	0.2	5	0	95.8	81.3	120	0			
Silver	4.72	0.02	5	0	94.4	70.1	123	0			

MS was outside statistical limits; sample concentration was over 4 times the added MS concentration, so recovery requirement is waived (4X Rule); usability of sample results is not affected.

Sample ID: 04020364-001B-MSD | Batch ID: 13519 | Units: mg/L | Analysis Date 2/17/2004 | Prep Date: 2/17/2004
Client ID: | Run ID: ME_PE9I_040217C | SeqNo: 560653

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	4.68	0.1	5	0	93.6	82.5	120	4.74	1.27	8.61	
Barium	4.85	0.1	5	0.392	89.2	81.1	116	4.93	1.64	6.14	
Cadmium	4.21	0.05	5	0	84.2	81.6	115	4.31	2.35	5.93	
Chromium	4.5	0.1	5	0	90	80.9	112	4.58	1.76	5.53	
Lead	4.35	0.1	5	0	87	80.5	113	4.44	2.05	5.79	
Selenium	4.75	0.2	5	0	95	81.3	120	4.79	0.839	10.6	
Silver	4.5	0.02	5	0	90	70.1	123	4.72	4.77	10.2	

MS was outside statistical limits; sample concentration was over 4 times the added MS concentration, so recovery requirement is waived (4X Rule); usability of sample results is not affected.

Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

Clayton GROUP SERVICES

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 04020459
Project:

QC SUMMARY REPORT
Sample Matrix Spike

Sample ID: 04020364-001b ms | Batch ID: 13522 | Units: mg/L | Analysis Date 2/18/2004 | Prep Date: 2/17/2004
Client ID: | Run ID: ME_CE5E_040218A | SeqNo: 561120

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Mercury	0.00228	0.001	0.002	0.00014	107	63.8	137	0			

Sample ID: 04020364-001b msd | Batch ID: 13522 | Units: mg/L | Analysis Date 2/18/2004 | Prep Date: 2/17/2004
Client ID: | Run ID: ME_CE5E_040218A | SeqNo: 561121

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Mercury	0.00208	0.001	0.002	0.00014	97	63.8	137	0.00228	9.17	30.7	

Clayton GROUP SERVICES

Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

THE ENVIRONMENTAL QUALITY COMPANY ®

Generator Approval Notification

April 4, 2006

Customer: EQ INDUSTRIAL SERVICES, INC.
Fax: (734) 547-2502

BOB ZARB
DOUBLE EAGLE
ATTN: CHRIS MCBEE
3000 MILLER ROAD
DEARBORN, MI 48120

This Generator Approval Notification acknowledges the acceptability of waste material(s) into the EQ environmental protection facility identified below and ensures that this facility has the appropriate permit(s) issued by federal and state regulatory agencies to properly transport, treat, and/or dispose of the waste material(s).

EQ FACILITY: EQ Detroit, Inc. (MID980991566)
1923 Frederick, Detroit, MI 48211

Approval Number: CF051037

Generator EPA ID: MID981092190 **Expires On:** 03/15/2006
Waste Common Name: FERROUS CHLORIDE FILTER MEDIA
Comments:

Primary Waste Code: D002
Secondary Waste Codes: D006, D007, D008

The Approval(s) listed above are based upon characterization information supplied to EQ by the Customer and the generator (if other than the Customer). The Customer is ultimately responsible for the accuracy and completeness of all such information, whether provided by the Customer or the generator. The Customer must notify the EQ Resource Team immediately upon knowledge of any changes to this information. This Approval and all wastes which are transported, delivered, or tendered to EQ under this Approval shall be subject to the attached Standard Terms and Conditions.

The Approval(s) will expire on the date(s) noted. Any new Approvals obtained from EQ on future business will be valid for a period of one (1) year from the date of issuance. Within 60 days of the Approval Expiration Date, you will be notified of the requirements for recertification.

CF051037

TH 106771

WASTE CHARACTERIZATION REPORT

☑ I authorize EQ – The Environmental Quality Company to choose the appropriate method of waste management, from the technologies offered, at the EQ facilities identified below.

☐ Michigan Disposal Waste Treatment Plant (Stabilization and Treatment)	49350 N. I-94 Service Drive, Belleville, MI 48111 Phone: 800-592-5489 Fax: 800-592-5329	EPA ID # MID 000 724 831
☐ Wayne Disposal, Inc. Site #2 Landfill (Hazardous & Chemical Waste Landfill)	49350 N. I-94 Service Drive, Belleville, MI 48111 Phone: 800-592-5489 Fax: 800-592-5329	EPA ID # MID 048 090 633
☑ EQ Detroit, Inc. (Stabilization, Wastewater Treatment)	1923 Frederick Street, Detroit, MI 48211 Phone: (313) 925-0080 Fax: 313-923-3375	EPA ID # MID 980 991 366
☐ EQ Resource Recovery, Inc. (Solvent Recycling, Fuel Blending, WW Treatment)	38345 Van Born Road, Romulus, MI 48174 Phone: 866-373-8357 Fax: 734-326-4033	EPA ID # MID 060 975 844
☐ EQ North Carolina (Stabilization, Treatment, Labpack Decommissioning)	1005 Investment Blvd, Apex, NC 27502 Phone: 919-363-4700 Fax: 919-363-4714	EPA ID # NCD 982 170 292
☐ EQ Florida, Inc. (Drum Consolidation, Labpack Decommissioning)	7202 Ham 8th Ave, Tampa, FL 33619 Phone: 813-623-5463 Fax: 813-628-0842	EPA ID # FLD 981 932 494
☐ EQ Transfer & Processing (Drum Transfer/Non-Hazardous Waste Processing)	1010 Old Rawsonville Rd., Ypsilanti, MI 48198 Phone: 734-547-1000 Fax: 734-480-9195	EPA ID # MIR 000 038 969 EPA ID # MIO 000 131 292
☐ EQ Indianapolis (Drum Transfer/Non-Hazardous Waste Processing)	4000 West 10th Street, Indianapolis, IN 46222 Phone: 317-247-7150 Fax: 317-247-7170	EPA ID # MIO 000 131 292
☐ EQ Atlanta (Drum Transfer/Non-Hazardous Waste Processing)	5600 Fulton Industrial Blvd SW, Atlanta, GA 30336 Phone: 404-494-3520 Fax: 404-494-3560	EPA ID # MIO 000 131 292
☐ EQ Augusta, Inc. (Wastewater Treatment)	3920 Goshen Industrial Blvd. Augusta, GA 30906 Phone: 706-771-9100 Fax: 706-771-9124	EPA ID # GAR 000 011 817

Waste Common Name: Ferrous Chloride ~~Sludge~~ Filter Media

Section 1 – Generator & Customer Information

SIC/NAICS* _____

Generator EPA ID # MID 981092196

Generator Double Eagle Steel

Facility Address 3000 Miller Road

City Dearborn State MI Zip 48120

County _____

Mailing Address _____

City _____ State _____ Zip _____

Generator Contact Mark Gerwick

Title _____

Phone 313.749.3603 Fax 313.749.2063

*For a list of NAICS codes, please refer to Section 9 of the EQ Resource Guide.

Internal Use Only: EQ Division _____

EQ Customer No. 4077

Invoicing Company EQIS

Address _____

City _____ State _____ Zip _____

Country _____

Invoicing Contact Stephanie Lewinge

Phone 734.547.2535 Fax _____

Technical Contact John Leonard

Phone 734.547.2531 Fax 734.547.2502

Mobile _____ Pager _____

E-mail _____

Section 2 – Shipping & Packaging Information

2.1) Shipping Volume & Frequency 3,000 gallons
☐ One Time Only ☐ Year ☑ Quarter ☐ Month

2.2) DOT Shipping Name RQ, WASTE CORROSIVE LIQUID, N.O.S. 8, UN 1760, PG II

2.3) Is this waste surcharge exempt? ☐ Yes ☑ No
If yes, please attach a surcharge exemption form, found in Section 2 of the EQ Resource Guide.

2.4) Packaging (check all that apply)
☐ Bulk Solid (Yd³ < 2000 lbs/yd³)
☐ Bulk Solid (Ton >2000 lbs/yd³)
☑ Bulk Liquids (Gallon)
☐ Totes, Size _____
☐ Cubic Yard Boxes/Bags
☐ Drums
☐ Other (palletized, 5 gal. Pail, etc.) _____
Quoted bulk disposal charges for solid materials will be billed by the cubic yard, if the waste density is less than 2,000lbs/cubic yard. If waste density is greater than 2,000 lbs/cubic yard, then bulk disposal charges will be billed by the ton, regardless of the shipment container.

Section 3 – Physical Characteristics

3.1) Color: Green 3.2) Odor: ACID

3.3) Does this waste contain any "Potentially Odorous Constituents" as defined in the EQ Resource Guide? (Section 3) ☐ Yes ☐ No

3.4) Physical State at 70°F: ☐ Solid ☐ Dust/Powder ☐ Liquid ☑ Sludge

3.5) What is the pH of this waste? ☑ ≤2 ☐ 2.1-4.9 ☐ 5-10 ☐ 10.1-12.4 ☐ ≥12.5

3.6) What is the flash point of this waste? ☐ <90°F ☐ 90-140°F ☐ 140-199°F ☑ ≥200°F

3.7) Does this waste contain? (check all that apply) ☐ None ☑ Free Liquids ☐ Oily Residue ☐ Metal Fines
☐ Biodegradable Sorbents ☐ Amines ☐ Ammonia ☐ Dioxins ☐ Furans ☐ Biohazard
☐ Shock Sensitive Waste ☐ Reactive Waste ☐ Radioactive Waste ☐ Explosives ☐ Pyrophoric Waste ☐ Isocyanates
☐ Asbestos – non-friable ☐ Asbestos – friable

Section 4 – Waste Composition and Generating Process

4.1) Describe the physical composition of the waste (i.e., soil, water, FPB, debris, key chemical compounds, etc.)

water 0 to 50 %
ferrous chloride 0 to 50 %
_____ to ____ %
_____ to ____ %
Total: 100%

4.2) Provide a detailed description of the process generating this waste (attach flow diagram if available).
Waste comes from Unloading Incoming loads of ferrous chloride from Tanker Trucks prior to filling Devale Eagle's Storage Tanks.

Section 5 – Hazardous or Non-Hazardous Waste?

Please refer to Section 5 of the EQ Resource Guide for a list of waste codes

As determined by 40 CFR, Part 261 and State Rules: Please list applicable waste code(s):

5.1) Is this an EPA RCRA listed hazardous waste (F, K, P or U)? ☐ Yes ☑ No

5.2) Is this an EPA RCRA characteristic hazardous waste (D001-D043)? ☑ Yes ☐ No D002, D006, D007, D008

5.3) Do any State Waste Codes apply? ☐ Yes ☑ No

5.4) Is this waste intended for wastewater treatment? ☐ Yes* ☑ No

*If you answered 'no' to 5.1, 5.2, and 5.3, please skip to Section 7. *If you answered 'yes' to 5.4, please attach the Waste Characterization Report Addendum found in Section 7 of the EQ Resource Guide.*

Section 6 – Hazardous Wastes

6.1) Does this waste exceed Land Disposal Restriction levels? ☐ Yes ☑ No
6.1a) If this waste stream is greater than 50% soil, does it meet the alternative soil treatment standards of 40 CFR 268.49? ☐ Yes ☑ No
6.1b) Does this waste contain greater than 50% debris, by volume? (Debris is greater than 2.5 inches in size.) ☐ Yes ☑ No
6.2) Is the waste an oxidizer (D001)? ☐ Yes ☑ No
6.3) Does this waste contain reactive cyanide ≥250 ppm (D003)? ☐ Yes ☑ No
6.4) Does this waste contain reactive sulfide ≥500 ppm (D003)? ☐ Yes ☑ No
6.5) Please indicate which constituent concentrations are below or above the regulatory level. Please indicate the basis used in the determination. Either "Below" or "Above" MUST be checked for each constituent.

Based On: ☐ Generator Knowledge ☐ Analysis* ☐ MSDS* *Please attach a copy.

Code		Regulatory Level TCLP (mg/l)	Concentration (If above)
D004	Arsenic	5	☐ Below ☐ Above ____
D005	Barium	100	☐ Below ☐ Above ____
D006	Cadmium	1	☐ Below ☑ Above 3.3
D007	Chromium	5	☐ Below ☑ Above 110
D008	Lead	5	☐ Below ☑ Above 82
D009	Mercury	0.2	☐ Below ☐ Above ____
D010	Selenium	1	☐ Below ☐ Above ____
D011	Silver	5	☐ Below ☐ Above ____
D012	Endrin	0.02	☐ Below ☐ Above ____
D013	Lindane	0.4	☐ Below ☐ Above ____
D014	Methoxychlor	10	☐ Below ☐ Above ____
D015	Toxaphene	0.5	☐ Below ☐ Above ____
D016	2,4-D	10	☐ Below ☐ Above ____
D017	2,4,5-TP (Silvex)	1	☐ Below ☐ Above ____
D018	Benzene	0.5	☐ Below ☐ Above ____
D019	Carbon Tetrachloride	0.5	☐ Below ☐ Above ____
D020	Chlordane	0.03	☐ Below ☐ Above ____
D021	Chlorobenzene	100	☐ Below ☐ Above ____
D022	Chloroform	6.0	☐ Below ☐ Above ____
D023	o-Cresol	200	☐ Below ☐ Above ____

Code		Regulatory Level TCLP (mg/l)	Concentration (If above)
D024	m-Cresol	200	☐ Below ☐ Above ____
D025	p-Cresol	200	☐ Below ☐ Above ____
D026	Cresols	200	☐ Below ☐ Above ____
D027	1,4-Dichlorobenzene	7.5	☐ Below ☐ Above ____
D028	1,2-Dichloroethane	0.5	☐ Below ☐ Above ____
D029	1,1-Dichloroethylene	0.7	☐ Below ☐ Above ____
D030	2,4-Dinitrotoluene	0.13	☐ Below ☐ Above ____
D031	Heptachlor	0.008	☐ Below ☐ Above ____
D032	Hexachlorobenzene	0.13	☐ Below ☐ Above ____
D033	Hexachlorobutadiene	0.5	☐ Below ☐ Above ____
D034	Hexachloroethane	3.0	☐ Below ☐ Above ____
D035	Methyl Ethyl Ketone	200	☐ Below ☐ Above ____
D036	Nitrobenzene	2	☐ Below ☐ Above ____
D037	Pentachlorophenol	100	☐ Below ☐ Above ____
D038	Pyridine	5	☐ Below ☐ Above ____
D039	Tetrachloroethylene	0.7	☐ Below ☐ Above ____
D040	Trichloroethylene	0.5	☐ Below ☐ Above ____
D041	2,4,5-Trichlorophenol	400	☐ Below ☐ Above ____
D042	2,4,6-Trichlorophenol	2	☐ Below ☐ Above ____
D043	Vinyl Chloride	0.2	☐ Below ☐ Above ____

6.6) If this is a characteristic hazardous waste, does it contain underlying hazardous constituents? ☐ Yes ☐ No
If yes, please list the constituents in Section 11.

Section 7 – Non-Hazardous Wastes

For a complete list of non-hazardous waste codes, please refer to Section 7 of the EQ Resource Guide

Please list applicable waste codes: _____

7.1) Is this a Michigan non-hazardous liquid industrial waste? ☐ Yes ☒ No
7.2) Is this a Universal waste? ☐ Yes ☒ No
7.3) Is this a Recyclable Commodity? (e.g.: computer monitors, free mercury, etc.) ☐ Yes ☒ No
7.4) Is this waste a reconverable petroleum product? ☐ Yes* ☒ No
7.5) Is this waste used oil as defined by 40 CFR Part 279? ☐ Yes* ☒ No

If you answered "yes" to questions 7.4 or 7.5 please attach the Waste Characterization Report Addendum found in Section 7 of the EQ Resource Guide.

Section 8 – TSCA Information

8.1) What is the concentration of PCBs in the waste? ☒ None ☐ 0-5 ppm ☐ 6-49 ppm ☐ 50-499 ppm ☐ 500+ ppm
8.2) Does the waste contain PCB contamination from a source with a concentration ≥ 50 ppm? ☐ Yes ☒ No

If you answered "no" to 8.1 and 8.2, please skip to Section 9.

8.3) Has this waste been processed into a non-liquid form? ☐ Yes ☐ No
If yes, what was the concentration of PCBs prior to processing? ☐ N/A ☐ 0-499 ppm ☐ 500+ ppm
8.4) Is the non-liquid PCB waste in the form of soil, rags, debris, or other contaminated media? ☐ Yes ☐ No
8.5) Are you a PCB capacitor manufacturer or a PCB equipment manufacturer? ☐ Yes ☐ No
8.6) Has the PCB Article (e.g., transformer, hydraulic machine, PCB-contaminated electrical equipment) been drained/flushed of all PCBs and decontaminated in accordance with 40 CFR 761.60(b)? ☐ N/A ☐ Yes ☐ No

Section 9 – Clean Air Act Information

NESHAP SIC*		
2812	2836	2875
2813	2841	2879
2816	2842	2891
2819	2843	2892
2821	2844	2893
2822	2851	2895
2823	2861	2899
2824	2865	2911
2833	2869	3312
2834	2873	4953
2835	2874	9511

9.1) Is this waste subject to regulation under 40 CFR, Part 63, Subpart DD or 40 CFR, Part 264, Subpart CC (RCRA)? ☐ Yes ☒ No
(Does the waste contain >500 ppm Volatile Organic Hazardous Air Pollutants – VOHAP's or Volatile Organic Compounds – VOC's?)
For a complete list of VOHAP's, please see Section 11 of the EQ Resource Guide
9.2) Does this waste stream contain Benzene? ☐ Yes ☒ No
If you answered "no" to 9.2, please skip to Section 10.
9.3) Does the waste stream come from a facility with one of the SIC codes listed under the NESHAP? ☐ Yes ☐ No
9.4) Is the generating source of this waste stream a facility with Total Annual Benzene (TAB) ≥10 Mg/year? ☐ Yes ☐ No
For assistance in calculating the TAB, please see the TAB Worksheet in Section 9 of the EQ Resource Guide.
If you answered "no" to question 9.3 and 9.4, please skip to Section 10.
9.5) Does the waste contain >10% water? ☐ Yes ☐ No
9.6) What is the TAB quantity for your facility? _____ Mg/Year
9.7) Does the waste contain ≥1.0 mg/kg total Benzene? ☐ Yes ☐ No
9.8) What is the total Benzene concentration in your waste? _____ Percent or _____ Ppm.
(Do not use TCLP analytical results. Acceptable laboratory methods include 8020, 8140, 8260, 602 and 624.)
*For a list of NAICS codes, please refer to Section 9 of the EQ Resource Guide.

Section 10 – Fuel Blending Information

10.1) Is this waste intended for fuel blending? ☐ Yes* ☒ No
*If yes, Heat value (BTU/lb.) _____ Chlorine (%) _____ Water (%) _____ Solids (%) _____
10.2) Is this waste intended for reclamation? ☐ Yes ☒ No (5-Gallon Sample required for all reclaim waste streams)

Section 11 – Constituent Information

Please identify your waste constituents from these four categories: *Underlying Hazardous Constituents (UHC's), Volatile Organic Hazardous Air Pollutants (VOHAP's), Volatile Organic Compounds (VOC's) and Toxic Release Inventory Constituents (TRI)*

Constituent	Concentration	UHC?		Constituent	Concentration	UHC?	
		☐ Yes	☐ No			☐ Yes	☐ No
		☐ Yes	☐ No			☐ Yes	☐ No
		☐ Yes	☐ No			☐ Yes	☐ No
		☐ Yes	☐ No			☐ Yes	☐ No
		☐ Yes	☐ No			☐ Yes	☐ No

Please see Section 11 of the EQ Resource Guide for a list of UHC's, VOHAP's and VOC's. For a complete list of TRI constituents, please refer to 40 CFR 372.65.

Section 12 – Certification

I certify that all information (including attachments) is complete and factual and is an accurate representation of the known and suspected hazards, pertaining to the waste described herein. I authorize EQ's Resource Team to add supplemental information to this waste approval file, provided I am contacted and give verbal permission. I authorize EQ's Resource Team to obtain a sample from any waste shipment for purposes of verification and confirmation. I agree that, if EQ approves the waste described herein, all such wastes that are transported, delivered, or tendered to EQ by Generator or on Generator's behalf shall be subject to, and Generator shall be bound by, the attached Standard Terms and Conditions.

Generator Signature [signature] Printed Name Mark Gornick

Company Double EAGLE Title EHS Date 3/9/05

The generator's signature MUST appear on the EQ Waste Characterization Report. If the generator has authorized a third party to certify this document, a written notice (on generator letterhead) must accompany this submittal. Although the EQ Resource Team is authorized to make certain modifications to the information provided on this form, the addition or removal of waste codes and waste constituents must be documented by the generator.

Land Disposal Restriction & Certification Form

Please check the appropriate facility:

☐ Michigan Disposal Waste Treatment Plant	49350 N. I-94 Service Drive, Belleville, MI 48111	EPA ID # MID 000 724 831
☐ Wayne Disposal, Inc. Site #2 Landfill	49350 N. I-94 Service Drive, Belleville, MI 48111	EPA ID # MID 048 090 633
☑ EQ Detroit, Inc.	1923 Frederick Street, Detroit, MI 48211	EPA ID # MID 980 991 566
☐ EQ Resource Recovery, Inc.	36345 Van Born Road, Romulus, MI 48174	EPA ID # MID 060 972 844
☐ EQ North Carolina	1005 Investment Blvd, Apex, NC 27502	EPA ID # NCD 988 170 292
☐ EQ Florida, Inc.	7202 East 8th Ave, Tampa, FL 33619	EPA ID # FLD 981 932 494

Generator Name: DOUBLE EAGLE U.S. EPA ID No.: MID 981092180

Generator Address: 3000 Miller Road, Dearborn, MI 48120

State Manifest No.: _____ Manifest Doc. No.: _____

Instructions

Column 1: Identify all U.S. EPA hazardous waste codes that apply to this waste shipment.
Column 2: Choose the appropriate treatability group: Non-Wastewater (NWW) or Wastewater (WW).
Column 3: Enter the appropriate Subcategory, if applicable, and also enter "Contaminated Soil" or "Debris" if the waste will be treated using one of the alternative treatment technologies provided by 268.49 (c) – soil, or 268.45 – debris.
Column 4: Enter the letter of the appropriate paragraph from pages 1-2 of this form.
Column 5: For F001 – F005, F039, D001 – D043, Debris and Contaminated Soil: please enter the Reference Number(s) for any constituents in your waste stream subject to treatment. The Reference Number(s) can be found in the EQ Resource Guide, LDR/UHC Constituent Table.

Manifest Line Item	U.S. EPA Hazardous Waste Code (s)	NWW or WW	Subcategory	How Must the Waste be Managed?	Reference Number(s) of Hazardous Constituents contained in the waste. Complete for F001-F005, F039, D001-D043, Soil and Debris wastes.
11A	D002, D006, D007, D008	NWW			
11B					
11C					
11D					

I hereby certify that all information submitted on this and all associated documents is complete and accurate to the best of my knowledge and information.

Generator Signature: [signature] Title: ENV.

Printed Name: Mark Gonzalez Date: 3/8/05

How Must the Waste Be Managed?

5. THIS CONTAMINATED SOIL *DOES / DOES NOT* (CIRCLE ONE) CONTAIN LISTED HAZARDOUS WASTE AND *DOES / DOES NOT* (CIRCLE ONE) EXHIBIT A CHARACTERISTIC OF HAZARDOUS WASTE AND *IS SUBJECT TO / COMPLIES WITH* (CIRCLE ONE) THE SOIL TREATMENT STANDARDS AS PROVIDED BY 268.49(c) OR THE UNIVERSAL TREATMENT STANDARDS. I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and believe that it has been maintained and operated properly so as to comply with treatment standards specified in 40 CFR 268.49 without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

INDUSTRIAL SERVICES, INC.
A division of EQ The Environmental Quality Company

2701 North I-94 Service Drive • Ypsilanti, Michigan 48198 • Tel 734-547-2500 • Fax 734-547-2501 • www.eqonline.com

Fax

To:	Deb Ferrari	**From:**	John Leonard
		Pages:	5
Fax:		**Date:**	
Re:		**CC:**	

☐ Urgent ☑ For Review ☐ Please Comment ☐ Please Reply ☐ Please Recycle

• **Comments:** Deb - profile & LDR for DOUBLE EAGLE. Emails to follow!

Thanks -
JL

THE ENVIRONMENTAL QUALITY COMPANY

Customer Account: 004077
Fax: (734) 547-2502

Customer Approval/Quote Confirmation
EQ Detroit, Inc. (MID980091566)
1923 Frederick
Detroit, MI 48211
March 15, 2005

ENVIRONMENTAL MANAGER
EQ INDUSTRIAL SERVICES, INC.
2701 NORTH I-94 SERVICE DRIVE
YPSILANTI, MI 48198

This Approval/Quote Confirmation acknowledges the acceptability of the waste described and ensures that the EQ environmental protection facility identified above has the appropriate permit(s) issued by federal and state regulatory agencies to properly transport, treat and/or dispose of the waste material(s) listed below. The Approval(s) are based upon information supplied to EQ by your company. The generator identified is ultimately responsible for the accuracy and completeness of the characterization information provided and any other information that was provided during the technical approval process. The generator must notify the EQ Resource Team immediately upon knowledge of any changes to this information. The Approval(s) and Quote(s) listed below will expire on the date(s) noted. Any new Approvals obtained from EQ on future business will be valid for a period of one (1) year from the date of issuance. For further information, refer to EQ's Standard Terms and Conditions (attached). Please prepare any Purchase/Work Orders for EQ-The Environmental Quality Company. To coordinate delivery of your waste stream(s), please contact your Scheduling Department at 1-800-495-6059.

I, _____ hereby certify that I have reviewed the information contained in this confirmation
(Authorized Customer Signature)
and agree to its contents and terms and conditions as set forth.

Printed Name: John Leonard Date: 3/15 Purchase/Work Order: _____

Please note the following:

- *Quoted bulk disposal charges for solid materials will be billed by the cubic yard if waste density is less than 2,000 pounds per cubic yard. If the waste density is greater than 2,000 pounds per cubic yard then bulk disposal charges will be billed by the ton regardless of the approved container. EQ personnel will monitor all shipments.*
- *An insurance surcharge of 1.5% will apply to all transportation, disposal and services provided.*
- *The Michigan DEQ will assess a manifest fee for all hazardous waste manifests used in the State of Michigan.*

Approval: **CF051037** Approval Expires On: **03/15/2006**

Generator: **MID981092190 DOUBLE EAGLE**
Common Name: **FERROUS CHLORIDE FILTER MEDIA**
Waste Codes: **Primary - D002 Secondary - D006 D007 D008**

Type of Service	Price	Unit	Min. Qty.
Treatment and Disposal - Additional $0.04 Hazardous Surcharge per unit	**$0.75**	**GAL**	**N/A**

IF LOAD REQUIRES WASH OUT / RINSE OUT THEIR WILL BE $150.00 FEE FOR 15 MINUTES

YOUR BUSINESS. OUR SOLUTIONS. A PRODUCTIVE PARTNERSHIP®

Mail or fax to: EQ Detroit, Inc., 1923 Frederick, Detroit, MI 48211. Phone: 1-800-495-6059 Fax: 1-313-923-3375

The Environmental Quality Company
Dynamic Solutions
123 Frederick Street
Pittsburgh, PA 15211-2560

LAB SAMPLE RESULT

Sample ID: D.E.O. 197

nerator: Double Eagle

Reference Number: 106771

FERROUS

Report Date : 03/15/2005

Total Metals for Chem Fix

Analyte Name	Result	Units	LOQ	Analysis Date
Antimony	Less Than	ppm	0.50	03/14/2005
Arsenic	Less Than	ppm	0.50	03/14/2005
Barium	T 3.3	ppm	0.50	03/14/2005
Beryllium	Less Than	ppm	0.50	03/14/2005
Cadmium	Less Than	ppm	0.10	03/14/2005
Chromium	T 39	ppm	0.50	03/14/2005
Lead	Less Than	ppm	0.50	03/14/2005
Mercury	Less Than	ppm	0.10	03/14/2005
Nickel	T 1.4	ppm	0.50	03/14/2005
Selenium	Less Than	ppm	0.50	03/14/2005
Silver	Less Than	ppm	0.10	03/14/2005
Thallium	Less Than	ppm	0.10	03/14/2005

Treatability and Fingerprint

Analyte Name	Result	Units	LOQ	Analysis Date
Treatability and Fingerprint	Complete			03/14/2005

Validated By:

Raymond D. Landsberg
Laboratory Manager

THE ENVIRONMENTAL QUALITY COMPANY ®

Generator Approval Notification **April 4, 2006**

Customer: EQ INDUSTRIAL SERVICES, INC.
Fax: (734) 547-2502

BOB ZARB
DOUBLE EAGLE
ATTN: CHRIS MCBEE
3000 MILLER ROAD
DEARBORN, MI 48120

This Generator Approval Notification acknowledges the acceptability of waste material(s) into the EQ environmental protection facility identified below and ensures that this facility has the appropriate permit(s) issued by federal and state regulatory agencies to properly transport, treat, and/or dispose of the waste material(s).

EQ FACILITY: EQ Detroit, Inc. (MID980991566)
1923 Frederick, Detroit, MI 48211

Approval Number: FF052589

Generator EPA ID: MID981092190 **Expires On:** 6/21/2006
Waste Common Name: LIQUID SPILLWAY WASTE (NON HAZ)
Comments:

Primary Waste Code: 029L

The Approval(s) listed above are based upon characterization information supplied to EQ by the Customer and the generator (if other than the Customer). The Customer is ultimately responsible for the accuracy and completeness of all such information, whether provided by the Customer or the generator. The Customer must notify the EQ Resource Team immediately upon knowledge of any changes to this information. This Approval and all wastes which are transported, delivered, or tendered to EQ under this Approval shall be subject to the attached Standard Terms and Conditions.

The Approval(s) will expire on the date(s) noted. Any new Approvals obtained from EQ on future business will be valid for a period of one (1) year from the date of issuance. Within 60 days of the Approval Expiration Date, you will be notified of the requirements for recertification.

FF052589 metals next 6-16

WASTE CHARACTERIZATION REPORT

T# 114466

☐ *I authorize EQ – The Environmental Quality Company to choose the appropriate method of waste management, from the technologies offered, at the EQ facilities identified below.*

☐ **Michigan Disposal Waste Treatment Plant** (Stabilization and Treatment)	49350 N. I-94 Service Drive, Belleville, MI 48111 Phone: 800-592-5489 Fax: 800-592-5329	EPA ID # MID 000 724 831
☐ **Wayne Disposal, Inc. Site #2 Landfill** (Hazardous & Chemical Waste Landfill)	49350 N. I-94 Service Drive, Belleville, MI 48111 Phone: 800-592-5489 Fax: 800-592-5329	EPA ID # MID 048 090 633
☒ **EQ Detroit, Inc.** (Stabilization, Wastewater Treatment)	1923 Frederick Street, Detroit, MI 48211 Phone: (313) 923-0080 Fax: 313-923-3375	EPA ID # MID 980 991 566
☐ **EQ Resource Recovery, Inc.** (Solvent Recycling, Fuel Blending, WW Treatment)	36345 Van Born Road, Romulus, MI 48174 Phone: 866-373-8357 Fax: 734-326-4033	EPA ID # MID 060 975 844
☐ **EQ North Carolina** (Stabilization, Treatment, Labpack Decommissioning)	1005 Investment Blvd, Apex, NC 27502 Phone: 919-363-4700 Fax: 919-363-4714	EPA ID # NCD 982 170 292
☐ **EQ Florida, Inc.** (Drum Consolidation, Labpack Decommissioning)	7202 East 8th Ave, Tampa, FL 33619 Phone: 813-623-5463 Fax: 813-628-0842	EPA ID # FLD 981 932 494
☐ **EQ Transfer & Processing** (Drum Transfer/Non-Hazardous Waste Processing)	1010 Old Rawsonville Rd., Ypsilanti, MI 48198 Phone: 734-547-1000 Fax: 734-480-9195	EPA ID # MIR 000 033 969 EPA ID # MI0 000 263 871
☐ **EQ Indianapolis** (Drum Transfer/Non-Hazardous Waste Processing)	4000 West 10th Street, Indianapolis, IN 46222 Phone: 317-247-7160 Fax: 317-247-7170	EPA ID # MI0 000 263 871
☐ **EQ Atlanta** (Drum Transfer/Non-Hazardous Waste Processing)	5600 Fulton Industrial Blvd SW, Atlanta, GA 30336 Phone: 404-494-3520 Fax: 404-494-3560	EPA ID # MI0 000 263 871
☐ **EQ Augusta, Inc.** (Wastewater Treatment)	3920 Goshen Industrial Blvd, Augusta, GA 30906 Phone: 706-771-9100 Fax: 706-771-9124	EPA ID # GAR 000 011 817

Waste Common Name: LIQUID SPILLWAY WASTE

Section 1 – Generator & Customer Information

SIC/NAICS* _____

Generator EPA ID # MID 981 092 190

Generator DOUBLE EAGLE

Facility Address 3000 MILLER ROAD

City Dearborn State MI Zip 48120

County WAYNE

Mailing Address _____

City _____ State _____ Zip _____

Generator Contact CHRIS McBEE

Title ENVIRONMENTAL ENGINEER

Phone 313/203-9829 Fax 313-203-9705

*For a list of NAICS codes, please refer to Section 9 of the EQ Resource Guide.

Internal Use Only: EQ Division _____

EQ Customer No. _____

Invoicing Company EQIS

Address _____

City _____ State _____ Zip _____

Country _____

Invoicing Contact JOHN LEONARD

Phone _____ Fax _____

Technical Contact _____

Phone _____ Fax _____

Mobile _____ Pager _____

E-mail MCBEE@DESCC.COM

Section 2 – Shipping & Packaging Information

2.1) Shipping Volume & Frequency 800-1000 gallons

☐ One Time Only ☐ Year ☒ Quarter ☐ Month

2.2) DOT Shipping Name

NON HAZARDOUS WASTE LIQUID

OTHER WASTE, 0291

2.3) Is this waste surcharge exempt? ☐ Yes ☒ No

If yes, please attach a surcharge exemption form, found in Section 2 of the EQ Resource Guide.

2.4) Packaging **(check all that apply)**

☐ Bulk Solid (Yd^3 < 2000 lbs/yd^3)

☐ Bulk Solid (Ton >2000 lbs/yd^3)

☒ Bulk Liquids (Gallon)

☐ Totes, Size _____

☐ Cubic Yard Boxes/Bags

☐ Drums

☐ Other (palletized, 5 gal. Pail, etc.) _____

Quoted bulk disposal charges for solid materials will be billed by the cubic yard, if the waste density is less than 2,000lbs./cubic yard. If waste density is greater than 2,000 lbs./cubic yard, then bulk disposal charges will be billed by the ton, regardless of the approved container.

© EQ-The Environmental Quality Company

Section 3 – Physical Characteristics

3.1) Color BLACK/BROWN 3.2) Odor NONE

3.3) Does this waste contain any "Potentially Odorous Constituents" as defined in the EQ Resource Guide? (Section 3) ☐ Yes ☒ No

3.4) Physical State at 70°F: ☐ Solid ☐ Dust/Powder ☒ Liquid ☐ Sludge

3.5) What is the pH of this waste? ☐ ≤2 ☐ 2.1-4.9 ☒ 5-10 ☐ 10.1-12.4 ☐ ≥12.5

3.6) What is the flash point of this waste? ☐ <90°F ☐ 90-140°F ☐ 140-199°F ☒ >200°F

3.7) Does this waste contain? **(check all that apply)** ☐ None ☒ Free Liquids ☐ Oily Residue ☐ Metal Fines

☐ Biodegradable Sorbants ☐ Amines ☐ Ammonia ☐ Dioxins ☐ Furans ☐ Biohazard

☐ Shock Sensitive Waste ☐ Reactive Waste ☐ Radioactive Waste ☐ Explosives ☐ Pyrophoric Waste ☐ Isocyanates

☐ Asbestos – non-friable ☐ Asbestos – friable

Section 4 – Waste Composition and Generating Process

4.1) Describe the physical composition of the waste (i.e., soil, water, PPE, debris, key chemical compounds, etc.)

WATER	90 to 100 %		____ to ____ %	
SOLIDS (MUD)	0 to 10 %		____ to ____ %	

Total: 100%

4.2) Provide a *detailed* description of the process generating this waste (attach flow diagram if available).

Wastewater treatment plant effluent: Rinsewater from Zinc electroplating on Carbon Steel 99%; Electrolyte Solution. Material is from Cooling tower

Section 5 – Hazardous or Non-Hazardous Waste?

Please refer to Section 5 of the EQ Resource Guide for a list of waste codes

As determined by 40 CFR, Part 261 and State Rules: **Please list applicable waste code(s):**

5.1) Is this an EPA RCRA listed hazardous waste (F, K, P or U)? ☐ Yes ☒ No

5.2) Is this an EPA RCRA characteristic hazardous waste (D001-D043)? ☐ Yes ☒ No

5.3) Do any State Waste Codes apply? ☐ Yes ☒ No

5.4) Is this waste intended for wastewater treatment? ☐ Yes* ☒ No

If you answered 'no' to 5.1, 5.2, and 5.3, please skip to Section 7. *If you answered 'yes' to 5.4, please attach the Waste Characterization Report Addendum found in Section 7 of the EQ Resource Guide.

Section 6 – Hazardous Wastes

6.1) Does this waste exceed Land Disposal Restriction levels? ☐ Yes ☒ No

6.1a) If this waste stream is greater than 50% soil, does it meet the alternative soil treatment standards of 40 CFR 268.49? ☐ Yes ☐ No

6.1b) Does this waste contain greater than 50% debris, by volume? (Debris is greater than 2.5 inches in size.) ☐ Yes ☒ No

6.2) Is the waste an oxidizer (D001)? ☐ Yes ☒ No

6.3) Does this waste contain reactive cyanide ≥250 ppm (D003)? ☐ Yes ☒ No

6.4) Does this waste contain reactive sulfide ≥500 ppm (D003)? ☐ Yes ☒ No

6.5) Please indicate which constituent concentrations are below or above the regulatory level. Please indicate the basis used in the determination. Either "Below" or "Above" MUST be checked for each constituent.

Based On: ☒ **Generator Knowledge** ☒ **Analysis*** ☐ **MSDS*** ***Please attach a copy.**

Code		Regulatory Level TCLP (mg/l)	Concentration (if above)	Code		Regulatory Level TCLP (mg/l)	Concentration (if above)
D004	Arsenic	5	☒ Below ☐ Above ____	D024	m-Cresol	200	☒ Below ☐ Above ____
D005	Barium	100	☒ Below ☐ Above ____	D025	p-Cresol	200	☒ Below ☐ Above ____
D006	Cadmium	1	☒ Below ☐ Above ____	D026	Cresols	200	☒ Below ☐ Above ____
D007	Chromium	5	☒ Below ☐ Above ____	D027	1,4-Dichlorobenzene	7.5	☒ Below ☐ Above ____
D008	Lead	5	☒ Below ☐ Above ____	D028	1,2-Dicholoroethane	0.5	☒ Below ☐ Above ____
D009	Mercury	0.2	☒ Below ☐ Above ____	D029	1,1-Dichloroethylene	0.7	☒ Below ☐ Above ____
D010	Selenium	1	☒ Below ☐ Above ____	D030	2,4-Dinitrotoluene	0.13	☒ Below ☐ Above ____
D011	Silver	5	☒ Below ☐ Above ____	D031	Heptachlor	0.008	☒ Below ☐ Above ____
D012	Endrin	0.02	☒ Below ☐ Above ____	D032	Hexachlorobenzene	0.13	☒ Below ☐ Above ____
D013	Lindane	0.4	☒ Below ☐ Above ____	D033	Hexachlorobutadiene	0.5	☒ Below ☐ Above ____
D014	Methoxychlor	10	☒ Below ☐ Above ____	D034	Hexachloroethane	3.0	☒ Below ☐ Above ____
D015	Toxaphene	0.5	☒ Below ☐ Above ____	D035	Methyl Ethyl Ketone	200	☒ Below ☐ Above ____
D016	2,4-D	10	☒ Below ☐ Above ____	D036	Nitrobenzene	2	☒ Below ☐ Above ____
D017	2,4,5-TP (Silvex)	1	☒ Below ☐ Above ____	D037	Pentachlorophenol	100	☒ Below ☐ Above ____
D018	Benzene	0.5	☒ Below ☐ Above ____	D038	Pyridine	5	☒ Below ☐ Above ____
D019	Carbon Tetrachloride	0.5	☒ Below ☐ Above ____	D039	Tetrachloroethylene	0.7	☒ Below ☐ Above ____
D020	Chlordane	0.03	☒ Below ☐ Above ____	D040	Trichloroethylene	0.5	☒ Below ☐ Above ____
D021	Chlorobenzene	100	☒ Below ☐ Above ____	D041	2,4,5-Trichlorophenol	400	☒ Below ☐ Above ____
D022	Chloroform	6.0	☒ Below ☐ Above ____	D042	2,4,6-Trichlorophenol	2	☒ Below ☐ Above ____
D023	o-Cresol	200	☒ Below ☐ Above ____	D043	Vinyl Chloride	0.2	☒ Below ☐ Above ____

6.6) If this is a characteristic hazardous waste, does it contain underlying hazardous constituents? ☐ Yes ☒ No

If yes, please list the constituents in Section 11.

N/A

Section 7 – Non-Hazardous Wastes

For a complete list of non-hazardous waste codes, please refer to Section 7 of the EQ Resource Guide

Please list applicable waste code: 029L

7.1) Is this a Michigan non-hazardous liquid industrial waste? ☒ Yes ☐ No
7.2) Is this a Universal waste? ☐ Yes ☒ No
7.3) Is this a Recyclable Commodity? (e.g.: computer monitors, free mercury, etc.) ☐ Yes ☒ No
7.4) Is this waste a recoverable petroleum product? ☐ Yes* ☒ No
7.5) Is this waste used oil as defined by 40 CFR Part 279? ☐ Yes* ☒ No

If you answered 'yes' to questions 7.4 or 7.5 please attach the Waste Characterization Report Addendum found in Section 7 of the EQ Resource Guide.

Section 8 – TSCA Information

8.1) What is the concentration of PCBs in the waste? ☒ None ☐ 0-5 ppm ☐ 6-49 ppm ☐ 50-499 ppm ☐ 500+ ppm
8.2) Does the waste contain PCB contamination from a source with a concentration ≥ 50 ppm? ☐ Yes ☒ No
If you answered "no" to 8.1 and 8.2, please skip to Section 9.
8.3) Has this waste been processed into a non-liquid form? ☐ Yes ☐ No
If yes, what was the concentration of PCBs prior to processing? ☐ N/A ☐ 0-499 ppm ☐ 500+ ppm
8.4) Is the non-liquid PCB waste in the form of soil, rags, debris, or other contaminated media? ☐ Yes ☐ No
8.5) Are you a PCB capacitor manufacturer or a PCB equipment manufacturer? ☐ Yes ☐ No
8.6) Has the PCB Article (e.g., transformer, hydraulic machine, PCB-contaminated electrical equipment) been drained/flushed of all PCBs and decontaminated in accordance with 40 CFR 761.60(b)? ☐ N/A ☐ Yes ☐ No

Section 9 – Clean Air Act Information

NESHAP SIC*		
2812	2836	2875
2813	2841	2879
2816	2842	2891
2819	2843	2892
2821	2844	2893
2822	2851	2895
2823	2861	2899
2824	2865	2911
2833	2869	3312
2834	2873	4953
2835	2874	9511

9.1) Is this waste subject to regulation under 40 CFR, Part 63, Subpart DD or 40 CFR, Part 264, Subpart CC (RCRA)? ☐ Yes ☒ No
(Does the waste contain >500 ppm Volatile Organic Hazardous Air Pollutants – VOHAP's or Volalite Organic Compounds – VOC's?)
For a complete list of VOHAP's, please see Section 11 of the EQ Resource Guide
9.2) Does this waste stream contain Benzene? ☐ Yes ☒ No
If you answered "no" to 9.2, please skip to Section 10.
9.3) Does the waste stream come from a facility with one of the SIC codes listed under the NESHAP? ☐ Yes ☒ No
9.4) Is the generating source of this waste stream a facility with Total Annual Benzene (TAB) ≥10 Mg/year? ☐ Yes ☒ No
For assistance in calculating the TAB, please see the TAB Worksheet in Section 9 of the EQ Resource Guide.
If you answered "no" to question 9.3 and 9.4, please skip to Section 10.
9.5) Does the waste contain >10% water? ☐ Yes ☐ No
9.6) What is the TAB quantity for your facility? _____ Mg/Year
9.7) Does the waste contain >1.0 mg/kg total Benzene? ☐ Yes ☐ No
9.8) What is the total Benzene concentration in your waste? _____ Percent or _____ ppmw.
(Do not use TCLP analytical results. Acceptable laboratory methods include 8020, 8240, 8260, 602 and 624.)
*For a list of NAICS codes, please refer to Section 9 of the EQ Resource Guide.

Section 10 – Fuel Blending Information

10.1) Is this waste intended for fuel blending? ☐ Yes* ☒ No
*If yes, Heat value (BTU/lb.) _____ Chlorine (%) _____ Water (%) _____ Solids (%) _____
10.2) Is this waste intended for reclamation? ☐ Yes ☒ No (5-Gallon Sample required for all reclaim waste streams)

Section 11 – Constituent Information

Please identify your waste constituents from these four categories: ***Underlying Hazardous Constituents (UHC's), Volatile Organic Hazardous Air Pollutants (VOHAP's), Volatile Organic Compounds (VOC's) and Toxic Release Inventory Constituents (TRI)***

Constituent	Concentration	UHC?		Constituent	Concentration	UHC?	
		☐ Yes	☐ No			☐ Yes	☐ No
		☐ Yes	☐ No			☐ Yes	☐ No
		☐ Yes	☐ No			☐ Yes	☐ No
		☐ Yes	☐ No			☐ Yes	☐ No
		☐ Yes	☐ No			☐ Yes	☐ No

Please see Section 11 of the EQ Resource Guide for a list of UHC's, VOHAP's and VOC's. For a complete list of TRI constituents, please refer to 40 CFR 372.65.

Section 12 – Certification

I certify that all information (including attachments) is complete and factual and is an accurate representation of the known and suspected hazards, pertaining to the waste described herein. I authorize EQ's Resource Team to add supplemental information to the waste approval file, provided I am contacted and give verbal permission. I authorize EQ's Resource Team to obtain a sample from any waste shipment for purposes of verification and confirmation. I agree that, if EQ approves the waste described herein, all such wastes that are transported, delivered, or tendered to EQ by Generator or on Generator's behalf shall be subject to, and Generator shall be bound by, the attached Standard Terms and Conditions.

Generator Signature Christopher McBee Printed Name CHRISTOPHER MCBEE

Company DOUBLE EAGLE STEEL Title ENVIRONMENTAL ENGINEER Date 6/16/05

The generator's signature MUST appear on the EQ Waste Characterization Report. If the generator has authorized a third party to certify this document, a written notice (on generator letterhead) must accompany this submittal. Although the EQ Resource Team is authorized to make certain modifications to the information provided on this form, the addition or removal of waste codes and waste constituents must be documented by the generator.

DOUBLE EAGLE LIQUID SPILLWAY

22345 Roethel Drive
Novi, MI 48375
248.344.1770
Fax 248.344.2654

Clayton GROUP SERVICES

June 14, 2005

Christopher McBee
DOUBLE EAGLE STEEL COATING COMPANY
3000 Miller Road
Dearborn, MI 48120-

Clayton Work Order No. 05060339

Reference:

Dear Christopher McBee:

Clayton Group Services received 3 samples on 6/8/2005 for the analyses presented in the following report.

Enclosed is a copy of the Chain-of-Custody record, acknowledging receipt of these samples. Please note that any unused portion of the samples will be discarded 30 days after the date of this report, unless you have requested otherwise.

This material is confidential and is intended solely for the person to whom it is addressed. If this is received in error, please contact the number provided below.

We appreciate the opportunity to assist you. If you have any questions concerning this report, please contact a Client Services Representative at (800) 806-5887.

Sincerely,

Karen Coonan
Client Services Representative

cc:

ANALYTICAL RESULTS

Date: *14-Jun-05*

CLIENT: DOUBLE EAGLE STEEL COATING COMPANY
Client Sample ID: LIQUID SPILLWAY
Work Order No: 05060339
Tag Number:
Project:
Collection Date: 6/6/2005
Lab ID: 05060339-001A
Matrix: AQUEOUS

Analyses	Result	Reporting Limit	Qual	Units	DF	Date Analyzed	Analyst
IGNITABILITY; METHOD EPA 1010							
Ignitability	>200	0		°F	1	6/8/2005	CLH
PH; METHOD EPA 150.1							
pH	8.4	1.0		pH Units	1	6/8/2005 6.40:00 PM	CLH
REACTIVE CYANIDE, EPA SW 846 CHAPTER 7.3.3.2							
Reactive Cyanide	ND	0.10		mg/L	1	6/10/2005	HML
REACTIVE SULFIDE; EPA SW 846 CHAPTER 7.3.4.2							
Reactive Sulfide	ND	100		mg/L	1	6/10/2005	HML

Qualifiers:

ND - Not Detected at the Reporting Limit (RL).
J - Analyte detected below the Reporting Limit
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
E - Value above quantitation range
T - Tentatively Identified Compound (TIC)

ANALYTICAL RESULTS

Date: *14-Jun-05*

CLIENT: DOUBLE EAGLE STEEL COATING COMPANY
Client Sample ID: LIQUID SPILLWAY
Work Order No: 05060339
Tag Number:
Project:
Collection Date: 6/6/2005
Lab ID: 05060339-001B
Matrix: LEACHATE

Analyses	Result	Reporting Limit	Qual	Units	DF	Date Analyzed	Analyst
ICP METALS;LEACHATE: METHOD EPA 1311/6010B							
Arsenic	ND	0.10		mg/L	1	6/10/2005	DH
Barium	0.13	0.10		mg/L	1	6/10/2005	DH
Cadmium	ND	0.050		mg/L	1	6/10/2005	DH
Chromium	ND	0.10		mg/L	1	6/10/2005	DH
Lead	ND	0.10		mg/L	1	6/10/2005	DH
Selenium	ND	0.20		mg/L	1	6/10/2005	DH
Silver	ND	0.020		mg/L	1	6/10/2005	DH
MERCURY; LEACHED: METHOD EPA 1311/7470A							
Mercury	ND	0.0010		mg/L	1	6/13/2005	RS

Qualifiers:

ND - Not Detected at the Reporting Limit (RL).
J - Analyte detected below the Reporting Limit
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
E - Value above quantitation range
T - Tentatively Identified Compound (TIC)

Clayton GROUP SERVICES

REQUEST FOR LABORATORY ANALYTICAL SERVICES

IMPORTANT
Date Results Requested: ~~6/13~~ 6/9
Rush Charges Authorized? ☒ Yes ☐ No
☐ Fax or ☐ E-mail Results
E-mail address:

6/13

Page ____ of ____
For Clayton Use Only
Clayton Lab Project No.
05060339

REPORT RESULTS TO
Name: CHRISTOPHER MCBEE
Company: DOUBLE EAGLE
Mailing Address: 3000 MILLER RD
City, State, Zip: Dearborn, MI 48120
Telephone No.:
FAX No.:
Client Job No.:
Dept.:

SEND INVOICE TO
Purchase Order No.:
Name:
Company:
Dept.:
Address:
City, State, Zip:

Special instructions and/or specific regulatory requirements: (method, limit of detection, etc.)

* Explanation of Preservative

Soils: Which state are these from? ____

Waters: ☐ Drinking Water ☐ Groundwater ☐ Wastewater

ANALYSIS REQUESTED (Enter an 'X' in the box below to indicate request. Enter a 'P' if Preservative added.*)

CLIENT SAMPLE IDENTIFICATION	DATE SAMPLED	TIME SAMPLED	MATRIX/ MEDIA	AIR VOLUME (specify units)	Number of Containers	TCLP M	~~TCLP~~	PAINT FILTER	pH	Reactivity	Flashpoint						FOR LAB USE ONLY
LIQUID SPILLWAY	6/6					X			X	X	X						
TANK 43 & 44 SLUDGE	6/7					X											
WWTP FilterCake	6/7					X		X									

CHAIN OF CUSTODY
Collected by: C. McBee (print)
Collector's Signature:
Relinquished by: C McBee — Date/Time 6/9/05
Received by: Alan B. Cobb — Date/Time 6/9/05 10:15
Relinquished by: — Date/Time 10:15 a.m.
Received by: — Date/Time
Method of Shipment:
Received at Lab by: — Date/Time
Authorized by: Christopher McBee (Client Signature MUST Accompany Request) Date 6/9/05
Sample Condition Upon Receipt: ☐ Acceptable ☐ Other (explain)

Please return completed form and samples to one of the Clayton Group Services, Inc. labs listed below:

Detroit Regional Lab
22345 Roethel Drive
Novi, MI 48375
(800) 806-5887
(248) 344-1770
FAX (248) 344-2655

Atlanta Regional Lab
3380 Chastain Meadows Parkway, Suite 300
Kennesaw, GA 30144
(800) 252-9919
(770) 499-7500
FAX (770) 423-4990

Seattle Regional Lab
4636 E. Marginal Way S., Suite 140
Seattle, WA 98134
(800) 568-7755
(206) 763-7364
FAX (206) 763-4189

DISTRIBUTION:
White = Clayton Laboratory
Yellow = Clayton Accounting
Pink = Client Copy

1/05 20K

THE ENVIRONMENTAL QUALITY COMPANY ®

Generator Approval Notification

April 4, 2006

Customer: EQ INDUSTRIAL SERVICES, INC.
Fax: (734) 547-2502

BOB ZARB
DOUBLE EAGLE
ATTN: CHRIS MCBEE
3000 MILLER ROAD
DEARBORN, MI 48120

This Generator Approval Notification acknowledges the acceptability of waste material(s) into the EQ environmental protection facility identified below and ensures that this facility has the appropriate permit(s) issued by federal and state regulatory agencies to properly transport, treat, and/or dispose of the waste material(s).

EQ FACILITY: EQ Detroit, Inc. (MID980991566)
1923 Frederick, Detroit, MI 48211

Approval Number: JF056742

Generator EPA ID: MID981092190 **Expires On:** 10/17/2006
Waste Common Name: Sump Waste
Comments: Contains Sludge - possible confined space to remove from tanker
Primary Waste Code: D002
Secondary Waste Codes:
D007

The Approval(s) listed above are based upon characterization information supplied to EQ by the Customer and the generator (if other than the Customer). The Customer is ultimately responsible for the accuracy and completeness of all such information, whether provided by the Customer or the generator. The Customer must notify the EQ Resource Team immediately upon knowledge of any changes to this information. This Approval and all wastes which are transported, delivered, or tendered to EQ under this Approval shall be subject to the attached Standard Terms and Conditions.

The Approval(s) will expire on the date(s) noted. Any new Approvals obtained from EQ on future business will be valid for a period of one (1) year from the date of issuance. Within 60 days of the Approval Expiration Date, you will be notified of the requirements for recertification.

JF056742

[redacted]

WASTE CHARACTERIZATION REPORT

See Notes in EQRR Preapproval Screen RUSH

☐ *I authorize EQ – The Environmental Quality Company to choose the appropriate method of waste management, from the technologies offered, at the EQ facilities identified below.*

☐ **Michigan Disposal Waste Treatment Plant** (Stabilization and Treatment)	49350 N. I-94 Service Drive, Belleville, MI 48111	Phone: 800-592-5489 Fax: 800-592-5329	EPA ID # MID 000 724 831
☐ **Wayne Disposal, Inc. Site #2 Landfill** (Hazardous & Chemical Waste Landfill)	49350 N. I-94 Service Drive, Belleville, MI 48111	Phone: 800-592-5489 Fax: 800-592-5329	EPA ID # MID 048 090 633
☒ **EQ Detroit, Inc.** (Stabilization, Wastewater Treatment)	1923 Frederick Street, Detroit, MI 48211	Phone: 800-495-6059 Fax: 313-923-3375	EPA ID # MID 980 991 566
☐ **EQ Resource Recovery, Inc.** (Solvent Recycling, Fuel Blending, WW Treatment)	36345 Van Born Road, Romulus, MI 48174	Phone: 866-373-8357 Fax: 734-326-4033	EPA ID # MID 060 975 844
☐ **EQ North Carolina** (Stabilization, Treatment, Labpack Decommissioning)	1005 Investment Blvd, Apex, NC 27502	Phone: 919-363-4700 Fax: 919-363-4714	EPA ID # NCD 982 170 292
☐ **EQ Florida, Inc.** (Drum Consolidation, Labpack Decommissioning)	7202 East 8th Ave, Tampa, FL 33619	Phone: 800-624-5302 Fax: 813-628-0842	EPA ID # FLD 981 932 494
☐ **EQ Transfer & Processing** (Drum Transfer/Non-Hazardous Waste Processing)	1010 Old Rawsonville Rd., Ypsilanti, MI 48198	Phone: 734-547-1000 Fax: 734-480-9195	EPA ID #MIO 000 263 871 EPA ID #MIR 000 033 969
☐ **EQ Indianapolis** (Drum Transfer/Non-Hazardous Waste Processing)	4000 West 10th Street, Indianapolis, IN 46222	Phone: 317-247-7160 Fax: 317-247-7170	EPA ID #MIO 000 263 871
☐ **EQ Atlanta** (Drum Transfer/Non-Hazardous Waste Processing)	5600 Fulton Industrial Blvd SW, Atlanta, GA 30336	Phone: 404-494-3520 Fax: 404-494-3560	EPA ID #MIO 000 263 871
☐ **EQ Augusta, Inc.** (Wastewater Treatment)	3920 Goshen Industrial Blvd, Augusta, GA 30906	Phone: 706-771-9100 Fax: 706-771-9124	EPA ID # GAR 000 011 817

Waste Common Name: SUMP WASTE

Section 1 – Generator & Customer Information

SIC/NAICS* _____

Generator EPA ID # MID 981 092 190

Generator Double Eagle

Facility Address 3000 Miller Road

City Dearborn State MI Zip 48120

County Wayne

Mailing Address _____

City _____ State _____ Zip _____

Generator Contact CHUCK McBee

Title ENV. ENG.

Phone 313-203-9829 Fax 313/203-9705

*For a list of NAICS codes, please refer to Section 9 of the EQ Resource Guide.

Internal Use Only: EQ Division _____

EQ Customer No. _____

Invoicing Company EQIS

Address _____

City _____ State _____ Zip _____

Country _____

Invoicing Contact John Leonard

Phone _____ Fax _____

Technical Contact _____

Phone _____ Fax _____

Mobile _____ Pager _____

E-mail McBee@DESCC.COM

Section 2 – Shipping & Packaging Information

2.1) Shipping Volume & Frequency 8,000

☐ One Time Only ☒ Year ☐ Quarter ☐ Month

2.2) DOT Shipping Name "RQ", WASTE Corrosive LIQUIDS N.O.S. 8, UN 1760 PG II

2.3) Is this waste surcharge exempt? ☐ Yes ☒ No

If yes, please attach a surcharge exemption form, found in Section 2 of the EQ Resource Guide.

2.4) Packaging (check all that apply)

☐ Bulk Solid (Yd³ < 2000 lbs/yd³)

☐ Bulk Solid (Ton >2000 lbs/yd³)

☒ Bulk Liquids (Gallon)

☐ Totes, Size _____

☐ Cubic Yard Boxes/Bags

☐ Drums

☐ Other (palletized, 5 gal. Pail, etc.) _____

Quoted bulk disposal charges for solid materials will be billed by the cubic yard, if the waste density is less than 2,000lbs./cubic yard. If waste density is greater than 2,000 lbs./cubic yard, then bulk disposal charges will be billed by the ton, regardless of the approved container.

© EQ-The Environmental Quality Company

Section 3 – Physical Characteristics

3.1) Color Copper / Brown 3.2) Odor MILD

3.3) Does this waste contain any "Potentially Odorous Constituents" as defined in the EQ Resource Guide? (Section 3) ☐ Yes ☒ No

3.4) Physical State at 70°F: ☐ Solid ☐ Dust/Powder ☒ Liquid ☒ Sludge

3.5) What is the pH of this waste? ☒ ≤ ☐ 2.1-4.9 ☐ 5-10 ☐ 10.1-12.4 ☐ ≥12.5

3.6) What is the flash point of this waste? ☐ <90°F ☐ 90-140°F ☐ 140-199°F ☒ >200°F

3.7) Does this waste contain? (check all that apply) ☐ None ☒ Free Liquids ☒ Oily Residue ☐ Metal Fines

☐ Biodegradable Sorbents ☐ Amines ☐ Ammonia ☐ Dioxins ☐ Furans ☐ Biohazard

☐ Shock Sensitive Waste ☐ Reactive Waste ☐ Radioactive Waste ☐ Explosives ☐ Pyrophoric Waste ☐ Isocyanates

☐ Asbestos – non-friable ☐ Asbestos – friable

Section 4 – Waste Composition and Generating Process

4.1) Describe the physical composition of the waste (i.e., soil, water, FPH, debris, key chemical compounds, etc.)

Hydrochloric Acid	3 to 6 %	OIL	60 to 80 %
WATER	15 to 25 %	SLUDGE / metals	5 to 10 %

Total: 100%

4.2) Provide a *detailed* description of the process generating this waste (attach flow diagram if available).

Skimming oil from sumps used to collect galvanizing solutions.

possible FE placement oil - not at bar WWT -

Not appropriate for GIT program SH

Section 5 – Hazardous or Non-Hazardous Waste?

Please refer to Section 5 of the EQ Resource Guide for a list of waste codes

As determined by 40 CFR, Part 261 and State Rules: Please list applicable waste code(s):

5.1) Is this an EPA RCRA listed hazardous waste (F, K, P or U)? ☐ Yes ☒ No

5.2) Is this an EPA RCRA characteristic hazardous waste (D001-D043)? ☒ Yes ☐ No D002, D007

5.3) Do any State Waste Codes apply? ☐ Yes ☒ No

5.4) Is this waste intended for wastewater treatment? ☐ Yes* ☒ No

*If you answered 'no' to 5.1, 5.2, and 5.3, please skip to Section 7. *If you answered 'yes' to 5.4, please attach the Waste Characterization Report Addendum found in Section 7 of the EQ Resource Guide.*

Section 6 – Hazardous Wastes

6.1) Does this waste exceed Land Disposal Restriction levels? ☒ Yes ☐ No

6.1a) If this waste stream is greater than 50% soil, does it meet the alternative soil treatment standards of 40 CFR 268.49? ☐ Yes ☒ No

6.1b) Does this waste contain greater than 50% debris, by volume? (Debris is greater than 2.5 inches in size.) ☐ Yes ☒ No

6.2) Is the waste an oxidizer (D001)? ☐ Yes ☒ No

6.3) Does this waste contain reactive cyanide ≥ 250 ppm (D003)? ☐ Yes ☒ No

6.4) Does this waste contain reactive sulfide ≥ 500 ppm (D003)? ☐ Yes ☒ No

6.5) Please indicate which constituent concentrations are below or above the regulatory level. Please indicate the basis used in the determination. Either "Below" or "Above" MUST be checked for each constituent.

Based On: ☒ Generator Knowledge ☒ Analysis* ☐ MSDS* *Please attach a copy.

Code		Regulatory Level TCLP (mg/l)	Concentration (if above)
D004	Arsenic	5	☐ Below ☐ Above
D005	Barium	100	☐ Below ☐ Above
D006	Cadmium	1	☐ Below ☐ Above
D007	Chromium	5	☐ Below ☒ Above 10.0
D008	Lead	5	☐ Below ☐ Above
D009	Mercury	0.2	☐ Below ☐ Above
D010	Selenium	1	☐ Below ☐ Above
D011	Silver	5	☐ Below ☐ Above
D012	Endrin	0.02	☐ Below ☐ Above
D013	Lindane	0.4	☐ Below ☐ Above
D014	Methoxychlor	10	☐ Below ☐ Above
D015	Toxaphene	0.5	☐ Below ☐ Above
D016	2,4-D	10	☐ Below ☐ Above
D017	2,4,5-TP (Silvex)	1	☐ Below ☐ Above
D018	Benzene	0.5	☐ Below ☐ Above
D019	Carbon Tetrachloride	0.5	☐ Below ☐ Above
D020	Chlordane	0.03	☐ Below ☐ Above
D021	Chlorobenzene	100	☐ Below ☐ Above
D022	Chloroform	6.0	☐ Below ☐ Above
D023	o-Cresol	200	☐ Below ☐ Above

Code		Regulatory Level TCLP (mg/l)	Concentration (if above)
D024	m-Cresol	200	☐ Below ☐ Above
D025	p-Cresol	200	☐ Below ☐ Above
D026	Cresols	200	☐ Below ☐ Above
D027	1,4-Dichlorobenzene	7.5	☐ Below ☐ Above
D028	1,2-Dichloroethane	0.5	☐ Below ☐ Above
D029	1,1-Dichloroethylene	0.7	☐ Below ☐ Above
D030	2,4-Dinitrotoluene	0.13	☐ Below ☐ Above
D031	Heptachlor	0.008	☐ Below ☐ Above
D032	Hexachlorobenzene	0.13	☐ Below ☐ Above
D033	Hexachlorobutadiene	0.5	☐ Below ☐ Above
D034	Hexachloroethane	3.0	☐ Below ☐ Above
D035	Methyl Ethyl Ketone	200	☐ Below ☐ Above
D036	Nitrobenzene	2	☐ Below ☐ Above
D037	Pentachlorophenol	100	☐ Below ☐ Above
D038	Pyridine	5	☐ Below ☐ Above
D039	Tetrachloroethylene	0.7	☐ Below ☐ Above
D040	Trichloroethylene	0.5	☐ Below ☐ Above
D041	2,4,5-Trichlorophenol	400	☐ Below ☐ Above
D042	2,4,6-Trichlorophenol	2	☐ Below ☐ Above
D043	Vinyl Chloride	0.2	☐ Below ☐ Above

6.6) If this is a characteristic hazardous waste, does it contain underlying hazardous constituents? ☐ Yes ☒ No

If yes, please list the constituents in Section 11.

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Section 7 – Non-Hazardous Wastes

For a complete list of non-hazardous waste codes, please refer to Section 7 of the EQ Resource Guide

Please list applicable waste code:

7.1) Is this a Michigan non-hazardous liquid industrial waste? ☐ Yes ☒ No
7.2) Is this a Universal waste? ☐ Yes ☒ No
7.3) Is this a Recyclable Commodity? (e.g.: computer monitors, free mercury, etc.) ☐ Yes* ☒ No
7.4) Is this waste a recoverable petroleum product? ☐ Yes* ☐ No
7.5) Is this waste used oil as defined by 40 CFR Part 279?

If you answered 'yes' to questions 7.4 or 7.5 please attach the Waste Characterization Report Addendum found in Section 7 of the EQ Resource Guide.

Section 8 – TSCA Information

8.1) What is the concentration of PCBs in the waste? ☒ None ☐ 0-5 ppm ☐ 6-49 ppm ☐ 50-499 ppm ☐ 500+ ppm
8.2) Does the waste contain PCB contamination from a source with a concentration ≥50 ppm? ☐ Yes ☒ No
If you answered "no" to 8.1 and 8.2, please skip to Section 9.
8.3) Has this waste been processed into a non-liquid form? ☐ Yes ☐ No
If yes, what was the concentration of PCBs prior to processing? ☐ N/A ☐ 0-499 ppm ☐ 500+ ppm
8.4) Is the non-liquid PCB waste in the form of soil, rags, debris, or other contaminated media? ☐ Yes ☐ No
8.5) Are you a PCB capacitor manufacturer or a PCB equipment manufacturer? ☐ Yes ☐ No
8.6) Has the PCB Article (e.g., transformer, hydraulic machine, PCB-contaminated electrical equipment) been drained/flushed of all PCBs and decontaminated in accordance with 40 CFR 761.60(b)? ☐ N/A ☐ Yes ☐ No

Section 9 – Clean Air Act Information

NESHAP SIC*		
2812	2836	2875
2813	2841	2879
2816	2842	2891
2819	2843	2892
2821	2844	2893
2822	2851	2895
2823	2861	2899
2824	2865	2911
2833	2869	3312
2834	2873	4953
2835	2874	9511

9.1) Is this waste subject to regulation under 40 CFR, Part 63, Subpart DD or 40 CFR, Part 264, Subpart CC (RCRA)? ☐ Yes ☒ No
(Does the waste contain >500 ppm Volatile Organic Hazardous Air Pollutants – VOHAP's or Volatile Organic Compounds – VOC's?)
For a complete list of VOHAP's, please see Section 11 of the EQ Resource Guide
9.2) Does this waste stream contain Benzene? ☐ Yes ☒ No
If you answered "no" to 9.2, please skip to Section 10.
9.3) Does the waste stream come from a facility with one of the SIC codes listed under the NESHAP? ☐ Yes ☐ No
9.4) Is the generating source of this waste stream a facility with Total Annual Benzene (TAB) ≥10 Mg/year? ☐ Yes ☐ No
For assistance in calculating the TAB, please see the TAB Worksheet in Section 9 of the EQ Resource Guide.
If you answered "no" to question 9.3 and 9.4, please skip to Section 10.
9.5) Does the waste contain >10% water? ☐ Yes ☐ No
9.6) What is the TAB quantity for your facility? _____ Mg/Year
9.7) Does the waste contain >1.0 mg/kg total Benzene? ☐ Yes ☐ No
9.8) What is the total Benzene concentration in your waste? _____ Percent or _____ ppmw.
(Do not use TCLP analytical results. Acceptable laboratory methods include 8020, 8240, 8260, 602 and 624.)
*For a list of NAICS codes, please refer to Section 9 of the EQ Resource Guide.

Section 10 – Fuel Blending Information

10.1) Is this waste intended for fuel blending? ☐ Yes* ☒ No
*If yes, Heat value (BTU/lb.) _____ Chlorine (%) _____ Water (%) _____ Solids (%) _____
10.2) Is this waste intended for reclamation? ☐ Yes ☒ No (5-Gallon Sample required for all reclaim waste streams)

Section 11 – Constituent Information

Please identify your waste constituents from these four categories: *Underlying Hazardous Constituents (UHC's), Volatile Organic Hazardous Air Pollutants (VOHAP's), Volatile Organic Compounds (VOC's) and Toxic Release Inventory Constituents (TRI)*

Constituent	Concentration	UHC?		Constituent	Concentration	UHC?	
		☐ Yes	☐ No			☐ Yes	☐ No
		☐ Yes	☐ No			☐ Yes	☐ No
		☐ Yes	☐ No			☐ Yes	☐ No
		☐ Yes	☐ No			☐ Yes	☐ No
		☐ Yes	☐ No			☐ Yes	☐ No

Please see Section 11 of the EQ Resource Guide for a list of UHC's, VOHAP's and VOC's. For a complete list of TRI constituents, please refer to 40 CFR 372.65.

Section 12 – Certification

I certify that all information (including attachments) is complete and factual and is an accurate representation of the known and suspected hazards, pertaining to the waste described herein. I authorize EQ's Resource Team to add supplemental information to the waste approval file, provided I am contacted and give verbal permission. I authorize EQ's Resource Team to obtain a sample from any waste shipment for purposes of verification and confirmation. I agree that, if EQ approves the waste described herein, all such wastes that are transported, delivered, or tendered to EQ by Generator or on Generator's behalf shall be subject to, and Generator shall be bound by, the attached Standard Terms and Conditions.

Generator Signature Christopher M Bee Printed Name CHRISTOPHER M BEE

Company DOUBLE EAGLE STEEL Title ENVIRONMENTAL ENGINEER Date 7/8/05

The generator's signature MUST appear on the EQ Waste Characterization Report. If the generator has authorized a third party to certify this document, a written notice (on generator letterhead) must accompany this submittal. Although the EQ Resource Team is authorized to make certain modifications to the information provided on this form, the addition or removal of waste codes and waste constituents must be documented by the generator.

Land Disposal Restriction & Certification Form

Please check the appropriate facility:

☐ **Michigan Disposal Waste Treatment Plant**	49350 N. I-94 Service Drive, Belleville, MI 48111	EPA ID # MID 000 724 831
☐ **Wayne Disposal, Inc. Site #2 Landfill**	49350 N. I-94 Service Drive, Belleville, MI 48111	EPA ID # MID 048 090 633
☐ **EQ Detroit, Inc.**	1923 Frederick Street, Detroit, MI 48211	EPA ID # MID 980 991 366
☐ **EQ Resource Recovery, Inc.**	36945 Van Born Road, Romulus, MI 48174	EPA ID # MID 050 975 844
☐ **EQ North Carolina**	1005 Investment Blvd, Apex, NC 27502	EPA ID # NCD 982 170 298
☐ **EQ Florida, Inc.**	7202 East 8th Ave, Tampa, FL 33619	EPA ID # FLD 981 932 494

Generator Name: Double EAGle Steel **U.S. EPA ID No.:** MID 981 092 190

Generator Address: 3000 Miller Road, Dearborn, MI 48120

State Manifest No.: _____ **Manifest Doc. No.:** _____

Instructions

Column 1: Identify all U.S. EPA hazardous waste codes that apply to this waste shipment.
Column 2: Choose the appropriate treatability group: Non-Wastewater (NWW) or Wastewater (WW).
Column 3: Enter the appropriate Subcategory, if applicable, and also enter "Contaminated Soil" or "Debris" if the waste will be treated using one of the alternative treatment technologies provided by 268.49 (c) – soil, or 268.45 – debris.
Column 4: Enter the letter of the appropriate paragraph from pages 1-2 of this form.
Column 5: For F001 – F005, F039, D001 – D043, Debris and Contaminated Soil: please enter the Reference Number(s) for any constituents in your waste stream subject to treatment. The Reference Number(s) can be found in the EQ Resource Guide, LDR/UHC Constituent Table.

Manifest Line Item	U.S. EPA Hazardous Waste Code (s)	NWW or WW	Subcategory	How Must the Waste be Managed?	Reference Number(s) of Hazardous Constituents contained in the waste. Complete for F001-F005, F039, D001-D043, Soil and Debris waste.
11A	D002, D007				UHC of lead Cadmium
11B					
11C					
11D					

I hereby certify that all information submitted on this and all associated documents is complete and accurate to the best of my knowledge and information.

Generator Signature: Christopher McGee **Title:** Env. Engineer

Printed Name: Christopher McGee **Date:** 7/8/05

How Must the Waste Be Managed?

5. THIS CONTAMINATED SOIL *DOES / DOES NOT* (CIRCLE ONE) CONTAIN LISTED HAZARDOUS WASTE AND *DOES / DOES NOT* (CIRCLE ONE) EXHIBIT A CHARACTERISTIC OF HAZARDOUS WASTE AND *IS SUBJECT TO / COMPLIES WITH* (CIRCLE ONE) THE SOIL TREATMENT STANDARDS AS PROVIDED BY 268.49(c) OR THE UNIVERSAL TREATMENT STANDARDS. I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and believe that it has been maintained and operated properly so as to comply with treatment standards specified in 40 CFR 268.49 without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

SUMP Waste VEG 5017

22345 Roethel Drive
Novi, MI 48375
248.344.1770
Fax 248.344.2654

Clayton GROUP SERVICES

July 21, 2005

Christopher McBee
DOUBLE EAGLE STEEL COATING COMPANY
3000 Miller Road
Dearborn, MI 48120-

Clayton Work Order No. 05070413

Reference:

Dear Christopher McBee:

Clayton Group Services received 1 sample on 7/12/2005 for the analyses presented in the following report.

Enclosed is a copy of the Chain-of-Custody record, acknowledging receipt of these samples. Please note that any unused portion of the samples will be discarded 30 days after the date of this report, unless you have requested otherwise.

This material is confidential and is intended solely for the person to whom it is addressed. If this is received in error, please contact the number provided below.

We appreciate the opportunity to assist you. If you have any questions concerning this report, please contact a Client Services Representative at (800) 806-5887.

Sincerely,

Karen Coonan

Karen Coonan
Client Services Representative

cc:

Clayton GROUP SERVICES

CASE NARRATIVE

Date: *21-Jul-05*

CLIENT: DOUBLE EAGLE STEEL COATING COMPANY

Project:

Work Order No 05070413

All quality control results associated with this sample set were within acceptable limits and/or do not adversely affect the reported results, unless otherwise noted below.

Samples were received at the laboratory at an average temperature of 5.7 °C.

Analytical Comments for Method RCN_S, sample 69483: LCS was slightly higher than statistical limits. Results are not affected because samples were non-detect.

ANALYTICAL RESULTS

Date: *21-Jul-05*

Clayton GROUP SERVICES

CLIENT: DOUBLE EAGLE STEEL COATING COMPANY
Client Sample ID: SUMP WASTE W/O OIL
Work Order No: 05070413
Tag Number:
Project:
Collection Date: 7/8/2005 2:00:00 PM
Lab ID: 05070413-001A
Matrix: WASTE

Analyses	Result	Reporting Limit	Qual	Units	DF	Date Analyzed	Analyst
IGNITABILITY; METHOD EPA 1010							
Ignitability	>200	0		°F	1	7/21/2005	CLH
ICP METALS; WATER: METHOD EPA 6010B							
Lead	1,000 UHC	100		µg/L	1	7/13/2005	CAW
Zinc	2,200,000 TE	100		µg/L	1	7/13/2005	CAW
PH; METHOD EPA 150.1							
pH	<2	2.0		pH Units	1	7/14/2005 8:10:00 P	RAS
REACTIVE CYANIDE, EPA SW 846 CHAPTER 7.3.3.2							
Reactive Cyanide	ND	0.10		mg/L	1	7/21/2005	HML
REACTIVE SULFIDE; EPA SW 846 CHAPTER 7.3.4.2							
Reactive Sulfide	ND	100		mg/L	1	7/20/2005	HML

Qualifiers:

ND - Not Detected at the Reporting Limit (RL).
J - Analyte detected below the Reporting Limit
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
E - Value above quantitation range
T - Tentatively Identified Compound (TIC)

ANALYTICAL RESULTS

Date: *21-Jul-05*

Clayton GROUP SERVICES

CLIENT: DOUBLE EAGLE STEEL COATING COMPANY
Client Sample ID: SUMP WASTE W/O OIL
Work Order No: 05070413
Tag Number:
Project:
Collection Date: 7/8/2005 2:00:00 PM
Lab ID: 05070413-001B
Matrix: LEACHATE

Analyses	Result	Reporting Limit	Qual	Units	DF	Date Analyzed	Analyst
ICP METALS;LEACHATE: METHOD EPA 1311/6010B							
Arsenic	ND	0.10		mg/L	1	7/18/2005	DH
Barium	0.60 TNI	0.10		mg/L	1	7/18/2005	DH
Cadmium	0.12 UNC	0.050		mg/L	1	7/18/2005	DH
Chromium	7.3 TNI	0.10		mg/L	1	7/18/2005	DH
Lead	1.1 UNC	0.10		mg/L	1	7/18/2005	DH
Selenium	ND	0.20		mg/L	1	7/18/2005	DH
Silver	0.082 TNI	0.020		mg/L	1	7/18/2005	DH
MERCURY; LEACHED: METHOD EPA 1311/7470A							
Mercury	ND	0.0010		mg/L	1	7/18/2005	RS

Qualifiers:

ND - Not Detected at the Reporting Limit (RL).
J - Analyte detected below the Reporting Limit
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
E - Value above quantitation range
T - Tentatively Identified Compound (TIC)

Clayton Group Services

Date: *21-Jul-05*

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 05070413
Project:

QC SUMMARY REPORT

Method Blank

Sample ID: MB-19912 | Batch ID: 19912 | Units: mg/L | Analysis Date: 7/18/2005 | Prep Date: 7/18/2005
Client ID: | Run ID: ME_PE9I_050718C | SeqNo: 809551

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	ND	0.1									
Barium	ND	0.1									
Cadmium	ND	0.05									
Chromium	ND	0.1									
Lead	ND	0.1									
Selenium	ND	0.2									
Silver	ND	0.02									

Sample ID: MB-19846 | Batch ID: 19846 | Units: µg/L | Analysis Date: 7/13/2005 | Prep Date: 7/13/2005
Client ID: | Run ID: ME_PE3C_050713B | SeqNo: 807649

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Lead	ND	100									
Zinc	ND	100									

Sample ID: MB-19913 | Batch ID: 19913 | Units: µg/L | Analysis Date: 7/18/2005 | Prep Date: 7/18/2005
Client ID: | Run ID: ME_VA2B_050718A | SeqNo: 809374

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Mercury	ND	0.2									

Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 05070413
Project:

QC SUMMARY REPORT

Method Blank

Sample ID: MB-R69483 | Batch ID: R69483 | Units: mg/Kg | Analysis Date: 7/21/2005 | Prep Date:
Client ID: | Run ID: WC_PE10J_050721B | SeqNo: 811558

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Reactive Cyanide	ND	0.1									

Sample ID: MB-R69482 | Batch ID: R69482 | Units: mg/Kg | Analysis Date: 7/20/2005 | Prep Date:
Client ID: | Run ID: WC_MA7G_050720B | SeqNo: 811553

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Reactive Sulfide	ND	100									

Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

Clayton Group Services

Date: *21-Jul-05*

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 05070413
Project:

QC SUMMARY REPORT

Laboratory Control Spike

Sample ID: LCS-19912 | Batch ID: 19912 | Units: mg/L | Analysis Date: 7/18/2005 | Prep Date: 7/18/2005
Client ID: | Run ID: ME_PE9I_050718C | SeqNo: 809552

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	5.23	0.1	5	0	105	84	113	0			
Barium	5.24	0.1	5	0	105	87.6	112	0			
Cadmium	5.23	0.05	5	0	105	86.9	113	0			
Chromium	5.24	0.1	5	0	105	84.6	112	0			
Lead	5.28	0.1	5	0	106	86.2	111	0			
Selenium	5.24	0.2	5	0	105	82	114	0			
Silver	5.22	0.02	5	0	104	77.9	118	0			

Sample ID: LCS-19846 | Batch ID: 19846 | Units: µg/L | Analysis Date: 7/13/2005 | Prep Date: 7/13/2005
Client ID: | Run ID: ME_PE3C_050713B | SeqNo: 807650

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Lead	4870	100	5000	0	97.4	87.2	111	0			
Zinc	4910	100	5000	0	98.2	85.6	111	0			

Sample ID: LCS-19913 | Batch ID: 19913 | Units: µg/L | Analysis Date: 7/18/2005 | Prep Date: 7/18/2005
Client ID: | Run ID: ME_VA2B_050718A | SeqNo: 809375

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Mercury	1.97	0.2	2	0	98.5	75.3	124	0			

Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 05070413
Project:

QC SUMMARY REPORT

~~Laboratory~~ Control Spike

Sample ID: LCS-R69483 | Batch ID: R69483 | Units: mg/Kg | Analysis Date: 7/21/2005 | Prep Date:
Client ID: | Run ID: WC_PE10J_050721B | SeqNo: 811559

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Reactive Cyanide	14.3	0.1	100	0	14.3	1.41	13.3	0			S

LCS was slightly higher than statistical limits. Results are not affected because samples were non-detect.

Sample ID: LCS-R69482 | Batch ID: R69482 | Units: mg/Kg | Analysis Date: 7/20/2005 | Prep Date:
Client ID: | Run ID: WC_MA7G_050720B | SeqNo: 811554

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Reactive Sulfide	113.1	100	180.8	0	62.5	4.19	106	0			

Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

Clayton Group Services

Date: *21-Jul-05*

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 05070413
Project:

QC SUMMARY REPORT

~~Sample Matrix Spike~~

Sample ID: 05070274-001B-MS | Batch ID: 19846 | Units: mg/L | Analysis Date: 7/13/2005 | Prep Date: 7/13/2005
Client ID: | Run ID: ME_PE3C_050713B | SeqNo: 807653

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	5.04	0.1	5	0	101	82.5	120	0			
Barium	5.02	0.1	5	0	100	81.1	116	0			
Cadmium	5.38	0.05	5	0.499	97.6	81.6	115	0			
Chromium	5	0.1	5	0	100	80.9	112	0			
Lead	4.93	0.1	5	0	98.6	80.5	113	0			
Selenium	5.05	0.2	5	0	101	81.3	120	0			
Silver	5.05	0.02	5	0	101	70.1	123	0			
Zinc	4.86	0.1	5	0	97.2	79	120	0			

Sample ID: 05070274-001B-MSD | Batch ID: 19846 | Units: mg/L | Analysis Date: 7/13/2005 | Prep Date: 7/13/2005
Client ID: | Run ID: ME_PE3C_050713B | SeqNo: 807656

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	5.14	0.1	5	0	103	82.5	120	5.04	1.96	8.61	
Barium	4.98	0.1	5	0	99.6	81.1	116	5.02	0.8	6.14	
Cadmium	5.4	0.05	5	0.499	98	81.6	115	5.38	0.371	5.93	
Chromium	5.11	0.1	5	0	102	80.9	112	5	2.18	5.53	
Lead	5.03	0.1	5	0	101	80.5	113	4.93	2.01	5.79	
Selenium	5.17	0.2	5	0	103	81.3	120	5.05	2.35	10.6	
Silver	5.16	0.02	5	0	103	70.1	123	5.05	2.15	10.2	
Zinc	5.22	0.1	5	0	104	79	120	4.86	7.14	10	

Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 05070413
Project:

QC SUMMARY REPORT

Sample Matrix Spike

Sample ID: 05070498-001BMS | Batch ID: 19912 | Units: mg/L | Analysis Date: 7/18/2005 | Prep Date: 7/18/2005
Client ID: | Run ID: ME_PE9I_050718C | SeqNo: 809555

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	5.22	0.1	5	0	104	82.5	120	0			
Barium	5.28	0.1	5	0	106	81.1	116	0			
Cadmium	5.16	0.05	5	0	103	81.6	115	0			
Chromium	5.21	0.1	5	0	104	80.9	112	0			
Lead	5.27	0.1	5	0	105	80.5	113	0			
Selenium	5.26	0.2	5	0	105	81.3	120	0			
Silver	5.22	0.02	5	0	104	70.1	123	0			

Sample ID: 05070498-001BMSD | Batch ID: 19912 | Units: mg/L | Analysis Date: 7/18/2005 | Prep Date: 7/18/2005
Client ID: | Run ID: ME_PE9I_050718C | SeqNo: 809556

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	5.19	0.1	5	0	104	82.5	120	5.22	0.576	8.61	
Barium	5.16	0.1	5	0	103	81.1	116	5.28	2.3	6.14	
Cadmium	5.06	0.05	5	0	101	81.6	115	5.16	1.96	5.93	
Chromium	5.13	0.1	5	0	103	80.9	112	5.21	1.55	5.53	
Lead	5.2	0.1	5	0	104	80.5	113	5.27	1.34	5.79	
Selenium	5.22	0.2	5	0	104	81.3	120	5.26	0.763	10.6	
Silver	5.14	0.02	5	0	103	70.1	123	5.22	1.54	10.2	

Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 05070413
Project:

QC SUMMARY REPORT

Sample Matrix Spike

Sample ID: 05070498-001BMS | Batch ID: 19913 | Units: mg/L | Analysis Date: 7/18/2005 | Prep Date: 7/18/2005
Client ID: | Run ID: ME_VA2B_050718A | SeqNo: 809378

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Mercury	0.00173	0.001	0.002	0	86.5	63.8	137	0			

Sample ID: 05070498-001BMSD | Batch ID: 19913 | Units: mg/L | Analysis Date: 7/18/2005 | Prep Date: 7/18/2005
Client ID: | Run ID: ME_VA2B_050718A | SeqNo: 809379

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Mercury	0.00158	0.001	0.002	0	79	63.8	137	0.00173	9.06	30.7	

Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

THE ENVIRONMENTAL QUALITY COMPANY ®

Generator Approval Notification

February 27, 2006

Customer: EQ INDUSTRIAL SERVICES, INC.
Fax: (734) 547-2502

CHRIS MCBEE
DOUBLE EAGLE
ATTN: CHRIS MCBEE
3000 MILLER ROAD
DEARBORN, MI 48120

This Generator Approval Notification acknowledges the acceptability of waste material(s) into the EQ environmental protection facility identified below and ensures that this facility has the appropriate permit(s) issued by federal and state regulatory agencies to properly transport, treat, and/or dispose of the waste material(s).

EQ FACILITY: EQ Detroit, Inc. (MID980991566)
1923 Frederick, Detroit, MI 48211

Approval Number: JF056742

Generator EPA ID: MID981092190 **Expires On:** 10/17/2006
Waste Common Name: Sump Waste
Comments: Contains Sludge - possible confined space to remove from tanker
Primary Waste Code: D002
Secondary Waste Codes:
D007

The Approval(s) listed above are based upon characterization information supplied to EQ by the Customer and the generator (if other than the Customer). The Customer is ultimately responsible for the accuracy and completeness of all such information, whether provided by the Customer or the generator. The Customer must notify the EQ Resource Team immediately upon knowledge of any changes to this information. This Approval and all wastes which are transported, delivered, or tendered to EQ under this Approval shall be subject to the attached Standard Terms and Conditions.

The Approval(s) will expire on the date(s) noted. Any new Approvals obtained from EQ on future business will be valid for a period of one (1) year from the date of issuance. Within 60 days of the Approval Expiration Date, you will be notified of the requirements for recertification.

THE ENVIRONMENTAL QUALITY COMPANY ®

Generator Approval Notification

April 4, 2006

Customer: EQ INDUSTRIAL SERVICES, INC.
Fax: (734) 547-2502

BOB ZARB
DOUBLE EAGLE
ATTN: CHRIS MCBEE
3000 MILLER ROAD
DEARBORN, MI 48120

This Generator Approval Notification acknowledges the acceptability of waste material(s) into the EQ environmental protection facility identified below and ensures that this facility has the appropriate permit(s) issued by federal and state regulatory agencies to properly transport, treat, and/or dispose of the waste material(s).

EQ FACILITY: EQ Detroit, Inc. (MID980991566)
1923 Frederick, Detroit, MI 48211

Approval Number: LF051448

Generator EPA ID: MID981092190 **Expires On:** 12/5/2006
Waste Common Name: BASEMENT CLEANUP-PERLITE W/FILTERCAKE with HCL
Comments: Non Haz/Non Acid PArallel KF05946
Primary Waste Code: D002

The Approval(s) listed above are based upon characterization information supplied to EQ by the Customer and the generator (if other than the Customer). The Customer is ultimately responsible for the accuracy and completeness of all such information, whether provided by the Customer or the generator. The Customer must notify the EQ Resource Team immediately upon knowledge of any changes to this information. This Approval and all wastes which are transported, delivered, or tendered to EQ under this Approval shall be subject to the attached Standard Terms and Conditions.

The Approval(s) will expire on the date(s) noted. Any new Approvals obtained from EQ on future business will be valid for a period of one (1) year from the date of issuance. Within 60 days of the Approval Expiration Date, you will be notified of the requirements for recertification.

No Sample

WASTE CHARACTERIZATION REPORT

TR# 114364

☒ *I authorize EQ – The Environmental Quality Company to choose the appropriate method of waste management, from the technologies offered, at the EQ facilities identified below.*

LF05448

☐ **Michigan Disposal Waste Treatment Plant** (Stabilization and Treatment)	49350 N. I-94 Service Drive, Belleville, MI 48111 Phone: 800-592-5489 Fax: 800-592-5329	EPA ID # MID 000 724 831
☐ **Wayne Disposal, Inc. Site #2 Landfill** (Hazardous & Chemical Waste Landfill)	49350 N. I-94 Service Drive, Belleville, MI 48111 Phone: 800-592-5489 Fax: 800-592-5329	EPA ID # MID 048 090 633
☐ **EQ Detroit, Inc.** (Stabilization, Wastewater Treatment)	1923 Frederick Street, Detroit, MI 48211 Phone: 800-495-6059 Fax: 313-923-3375	EPA ID # MID 980 991 566
☐ **EQ Resource Recovery, Inc.** (Solvent Recycling, Fuel Blending, WW Treatment)	36345 Van Born Road, Romulus, MI 48174 Phone: 866-373-8357 Fax: 734-326-4033	EPA ID # MID 060 975 844
☐ **EQ North Carolina** (Stabilization, Treatment, Labpack Decommissioning)	1005 Investment Blvd, Apex, NC 27502 Phone: 919-363-4700 Fax: 919-363-4714	EPA ID # NCD 982 170 292
☐ **EQ Florida, Inc.** (Drum Consolidation, Labpack Decommissioning)	7202 East 8th Ave, Tampa, FL 33619 Phone: 800-624-5302 Fax: 813-628-0842	EPA ID # FLD 981 932 494
☐ **EQ Transfer & Processing** (Drum Transfer/Non-Hazardous Waste Processing)	1010 Old Rawsonville Rd., Ypsilanti, MI 48198 Phone: 734-547-1000 Fax: 734-480-9195	EPA ID # MIO 000 263 871 EPA ID # MIR 000 033 969
☐ **EQ Indianapolis** (Drum Transfer/Non-Hazardous Waste Processing)	4000 West 10th Street, Indianapolis, IN 46222 Phone: 317-247-7160 Fax: 317-247-7170	EPA ID # MIO 000 263 871
☐ **EQ Atlanta** (Drum Transfer/Non-Hazardous Waste Processing)	5600 Fulton Industrial Blvd SW, Atlanta, GA 30336 Phone: 404-494-3520 Fax: 404-494-3560	EPA ID # MIO 000 263 871
☐ **EQ Augusta, Inc.** (Wastewater Treatment)	3920 Goshen Industrial Blvd, Augusta, GA 30906 Phone: 706-771-9100 Fax: 706-771-9124	EPA ID # GAR 000 011 817

Waste Common Name: BASEMENT CLEANUP - PERLITE W/FILTER CAKE

Section 1 – Generator & Customer Information

SIC/NAICS* _____

Generator EPA ID # MID 981 092 190

Generator Double EAGLE STEEL COATING

Facility Address 3000 MILLER RD.

City Dearborn State MI Zip 48120

County WAYNE

Mailing Address _____

City _____ State _____ Zip _____

Generator Contact CHRIS MCBEE

Title ENVIRONMENTAL ENGINEER

Phone 313-203-9829 Fax 313-203-9705

*For a list of NAICS codes, please refer to Section 9 of the EQ Resource Guide.

Internal Use Only: EQ Division _____

EQ Customer No. _____

Invoicing Company EQIS

Address _____

City _____ State _____ Zip _____

Country _____

Invoicing Contact JOHN LEONARD

Phone _____ Fax _____

Technical Contact _____

Phone _____ Fax _____

Mobile _____ Pager _____

E-mail MCBEE@DESCC.COM

cell (313) 363-1902

Section 2 – Shipping & Packaging Information

2.1) Shipping Volume & Frequency 3000 gal

☐ One Time Only ☐ Year ☒ Quarter ☐ Month

2.2) DOT Shipping Name

NON HAZARDOUS LIQUID INDUSTRIAL WASTE

2.3) Is this waste surcharge exempt? ☐ Yes ☒ No

If yes, please attach a surcharge exemption form, found in Section 2 of the EQ Resource Guide.

2.4) Packaging (check all that apply)

☐ Bulk Solid (Yd³ < 2000 lbs/yd³)

☐ Bulk Solid (Ton > 2000 lbs/yd³)

☒ Bulk Liquids (Gallon)

☐ Totes, Size _____

☐ Cubic Yard Boxes/Bags

☐ Drums

☐ Other (palletized, 5 gal. Pail, etc.) _____

Quoted bulk disposal charges for solid materials will be billed by the cubic yard, if the waste density is less than 2,000lbs./cubic yard. If waste density is greater than 2,000 lbs./cubic yard, then bulk disposal charges will be billed by the ton, regardless of the approved container.

© EQ-The Environmental Quality Company

Attn: Chris McBee

Section 3 – Physical Characteristics

3.1) Color RUST 3.2) Odor NONE

3.3) Does this waste contain any "Potentially Odorous Constituents" as defined in the EQ Resource Guide? (Section 3) ☐ Yes ☐ No

3.4) Physical State at 70°F: ☐ Solid ☐ Dust/Powder ☒ Liquid ☐ Sludge

3.5) What is the pH of this waste? ☐ ≤2 ☒ 2.1-4.9 ☐ 5-10 ☐ 10.1-12.4 ☐ ≥12.5

3.6) What is the flash point of this waste? ☐ <90°F ☐ 90-140°F ☐ 140-199°F ☒ ≥200°F

3.7) Does this waste contain? (check all that apply) ☐ None ☒ Free Liquids ☐ Oily Residue ☐ Metal Fines ☐ Biodegradable Sorbants ☐ Amines ☐ Ammonia ☐ Dioxins ☐ Furans ☐ Biohazard ☐ Shock Sensitive Waste ☐ Reactive Waste ☐ Radioactive Waste ☐ Explosives ☐ Pyrophoric Waste ☐ Isocyanates ☐ Asbestos – non-friable ☐ Asbestos – friable

Section 4 – Waste Composition and Generating Process

4.1) Describe the physical composition of the waste (i.e., soil, water, PPE, debris, key chemical compounds, etc.) DISSOLVED

LIQUID (WATER)	95 to 99 %	FILTER CAKE SLUDGE	0 to 1 %
Perlite	0 to 1 %		to %

Total: 100%

4.2) Provide a *detailed* description of the process generating this waste (attach flow diagram if available).

CLEANUP OF PERLITE (FILTER PRESS BINDING AGENT) FROM SHOP FLOOR USING WATER

Section 5 – Hazardous or Non-Hazardous Waste?

Please refer to Section 5 of the EQ Resource Guide for a list of waste codes

As determined by 40 CFR, Part 261 and State Rules: Please list applicable waste code(s):

5.1) Is this an EPA RCRA listed hazardous waste (F, K, P or U)? ☐ Yes ☒ No

5.2) Is this an EPA RCRA characteristic hazardous waste (D001-D043)? ☐ Yes ☒ No

5.3) Do any State Waste Codes apply? ☐ Yes ☒ No

5.4) Is this waste intended for wastewater treatment? ☐ Yes* ☒ No

*If you answered 'no' to 5.1, 5.2, and 5.3, please skip to Section 7. *If you answered 'yes' to 5.4, please attach the Waste Characterization Report Addendum found in Section 7 of the EQ Resource Guide.*

Section 6 – Hazardous Wastes

6.1) Does this waste exceed Land Disposal Restriction levels? ☐ Yes ☒ No

6.1a) If this waste stream is greater than 50% soil, does it meet the alternative soil treatment standards of 40 CFR 268.49? ☐ Yes ☐ No

6.1b) Does this waste contain greater than 50% debris, by volume? (Debris is greater than 2.5 inches in size.) ☐ Yes ☐ No

6.2) Is the waste an oxidizer (D001)? ☐ Yes ☒ No

6.3) Does this waste contain reactive cyanide ≥250 ppm (D003)? ☐ Yes ☒ No

6.4) Does this waste contain reactive sulfide ≥500 ppm (D003)? ☐ Yes ☒ No

6.5) Please indicate which constituent concentrations are below or above the regulatory level. Please indicate the basis used in the determination. Either "Below" or "Above" MUST be checked for each constituent.

Based On: ☒ Generator Knowledge ☒ Analysis* ☒ MSDS* *Please attach a copy.

Code		Regulatory Level TCLP (mg/l)	Concentration (if above)	Code		Regulatory Level TCLP (mg/l)	Concentration (if above)
D004	Arsenic	5	☒ Below ☐ Above	D024	m-Cresol	200	☒ Below ☐ Above
D005	Barium	100	☒ Below ☐ Above	D025	p-Cresol	200	☒ Below ☐ Above
D006	Cadmium	1	☒ Below ☐ Above	D026	Cresols	200	☒ Below ☐ Above
D007	Chromium	5	☒ Below ☐ Above	D027	1,4-Dichlorobenzene	7.5	☒ Below ☐ Above
D008	Lead	5	☒ Below ☐ Above	D028	1,2-Dichloroethane	0.5	☒ Below ☐ Above
D009	Mercury	0.2	☒ Below ☐ Above	D029	1,1-Dichloroethylene	0.7	☒ Below ☐ Above
D010	Selenium	1	☒ Below ☐ Above	D030	2,4-Dinitrotoluene	0.13	☒ Below ☐ Above
D011	Silver	5	☒ Below ☐ Above	D031	Heptachlor	0.008	☒ Below ☐ Above
D012	Endrin	0.02	☒ Below ☐ Above	D032	Hexachlorobenzene	0.13	☒ Below ☐ Above
D013	Lindane	0.4	☒ Below ☐ Above	D033	Hexachlorobutadiene	0.5	☒ Below ☐ Above
D014	Methoxychlor	10	☒ Below ☐ Above	D034	Hexachloroethane	3.0	☒ Below ☐ Above
D015	Toxaphene	0.5	☒ Below ☐ Above	D035	Methyl Ethyl Ketone	200	☒ Below ☐ Above
D016	2,4-D	10	☒ Below ☐ Above	D036	Nitrobenzene	2	☒ Below ☐ Above
D017	2,4,5-TP (Silvex)	1	☒ Below ☐ Above	D037	Pentachlorophenol	100	☒ Below ☐ Above
D018	Benzene	0.5	☒ Below ☐ Above	D038	Pyridine	5	☒ Below ☐ Above
D019	Carbon Tetrachloride	0.5	☒ Below ☐ Above	D039	Tetrachloroethylene	0.7	☒ Below ☐ Above
D020	Chlordane	0.03	☒ Below ☐ Above	D040	Trichloroethylene	0.5	☒ Below ☐ Above
D021	Chlorobenzene	100	☒ Below ☐ Above	D041	2,4,5-Trichlorophenol	400	☒ Below ☐ Above
D022	Chloroform	6.0	☒ Below ☐ Above	D042	2,4,6-Trichlorophenol	2	☒ Below ☐ Above
D023	o-Cresol	200	☒ Below ☐ Above	D043	Vinyl Chloride	0.2	☒ Below ☐ Above

6.6) If this is a characteristic hazardous waste, does it contain underlying hazardous constituents? ☐ Yes ☐ No N/A

If yes, please list the constituents in Section 11.

Section 7 – Non-Hazardous Wastes

For a complete list of non-hazardous waste codes, please refer to Section 7 of the EQ Resource Guide

Please list applicable waste codes: 0129

7.1) Is this a Michigan non-hazardous liquid industrial waste? ☒ Yes ☐ No
7.2) Is this a Universal waste? ☐ Yes ☒ No
7.3) Is this a Recyclable Commodity? (e.g.: computer monitors, free mercury, etc.) ☐ Yes ☒ No
7.4) Is this waste a recoverable petroleum product? ☐ Yes* ☒ No
7.5) Is this waste used oil as defined by 40 CFR Part 279? ☐ Yes* ☒ No

If you answered 'yes' to questions 7.4 or 7.5 please attach the Waste Characterization Report addendum found in Section 7 of the EQ Resource Guide.

Section 8 – TSCA Information

8.1) What is the concentration of PCBs in the waste? ☒ None ☐ 0-5 ppm ☐ 6-49 ppm ☐ 50-499 ppm ☐ 500+ ppm
8.2) Does the waste contain PCB contamination from a source with a concentration ≥ 50 ppm? ☐ Yes ☒ No
If you answered "no" to 8.1 and 8.2, please skip to Section 9.
8.3) Has this waste been processed into a non-liquid form? ☐ Yes ☐ No
If yes, what was the concentration of PCBs prior to processing? ☐ N/A ☐ 0-499 ppm ☐ 500+ ppm
8.4) Is the non-liquid PCB waste in the form of soil, rags, debris, or other contaminated media? ☐ Yes ☐ No
8.5) Are you a PCB capacitor manufacturer or a PCB equipment manufacturer? ☐ Yes ☐ No
8.6) Has the PCB Article (e.g., transformer, hydraulic machine, PCB-contaminated electrical equipment) been drained/flushed of all PCBs and decontaminated in accordance with 40 CFR 761.60(b)? ☐ N/A ☐ Yes ☐ No

Section 9 – Clean Air Act Information

NESHAP SIC*		
2812	2836	2875
2813	2841	2879
2816	2842	2891
2819	2843	2892
2821	2844	2893
2822	2851	2895
2823	2861	2899
2824	2865	2911
2833	2869	3312
2834	2873	4953
2835	2874	9511

9.1) Is this waste subject to regulation under 40 CFR, Part 63, Subpart DD or 40 CFR, Part 264, Subpart CC (RCRA)? ☐ Yes ☒ No
(Does the waste contain >500 ppm Volatile Organic Hazardous Air Pollutants – VOHAP's or Volatile Organic Compounds – VOC's?)
For a complete list of VOHAP's, please see Section 11 of the EQ Resource Guide
9.2) Does this waste stream contain Benzene? ☐ Yes ☒ No
If you answered "no" to 9.2, please skip to Section 10.
9.3) Does the waste stream come from a facility with one of the SIC codes listed under the NESHAP? ☐ Yes ☐ No
9.4) Is the generating source of this waste stream a facility with Total Annual Benzene (TAB) ≥10 Mg/year? ☐ Yes ☐ No
For assistance in calculating the TAB, please see the TAB Worksheet in Section 9 of the EQ Resource Guide.
If you answered "no" to question 9.3 and 9.4, please skip to Section 10.
9.5) Does the waste contain >10% water? ☐ Yes ☐ No
9.6) What is the TAB quantity for your facility? _____ Mg/Year
9.7) Does the waste contain >1.0 mg/kg total Benzene? ☐ Yes ☐ No
9.8) What is the total Benzene concentration in your waste? _____ Percent or _____ ppmw.
(Do not use TCLP analytical results. Acceptable laboratory methods include 8020, 8240, 8260, 602 and 624.)
*For a list of NAICS codes, please refer to Section 9 of the EQ Resource Guide.

Section 10 – Fuel Blending Information

10.1) Is this waste intended for fuel blending? ☐ Yes* ☒ No
*If yes, Heat value (BTU/lb.) _____ Chlorine (%) _____ Water (%) _____ Solids (%) _____
10.2) Is this waste intended for reclamation? ☐ Yes ☒ No (5-Gallon Sample required for all reclaim waste streams)

Section 11 – Constituent Information

Please identify your waste constituents from these four categories: *Underlying Hazardous Constituents (UHC's), Volatile Organic Hazardous Air Pollutants (VOHAP's), Volatile Organic Compounds (VOC's) and Toxic Release Inventory Constituents (TRI)*

Constituent	Concentration	UHC?		Constituent	Concentration	UHC?	
		☐ Yes	☐ No			☐ Yes	☐ No
		☐ Yes	☐ No			☐ Yes	☐ No
		☐ Yes	☐ No			☐ Yes	☐ No
		☐ Yes	☐ No			☐ Yes	☐ No
		☐ Yes	☐ No			☐ Yes	☐ No

Please see Section 11 of the EQ Resource Guide for a list of UHC's, VOHAP's and VOC's. For a complete list of TRI constituents, please refer to 40 CFR 372.65.

Section 12 – Certification

I certify that all information (including attachments) is complete and factual and is an accurate representation of the known and suspected hazards, pertaining to the waste described herein. I authorize EQ's Resource Team to add supplemental information to the waste approval file, provided I am contacted and give verbal permission. I authorize EQ's Resource Team to obtain a sample from any waste shipment for purposes of verification and confirmation. I agree that, if EQ approves the waste described herein, all such wastes that are transported, delivered, or tendered to EQ by Generator or on Generator's behalf shall be subject to, and Generator shall be bound by, the attached Standard Terms and Conditions.

Generator Signature Christopher McBee Printed Name CHRISTOPHER McBEE

Company DOUBLE EAGLE STEEL Title ENVIRONMENTAL ENGINEER Date 11/29/05

The generator's signature MUST appear on the EQ Waste Characterization Report. If the generator has authorized a third party to certify this document, a written notice (on generator letterhead) must accompany this submittal. Although the EQ Resource Team is authorized to make certain modifications to the information provided on this form, the addition or removal of waste codes and waste constituents must be documented by the generator.

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EaglePicher™ Filtration & Minerals, Inc.

MATERIAL SAFETY DATA SHEET

DATE ISSUED: May 26, 1993	DATE REVISED: July 1, 2004	REVISION NO: 4

SECTION I: MATERIAL IDENTIFICATION AND USE

MATERIAL NAME: Celatom Perlite (all grades)

MANUFACTURER'S NAME: EaglePicher Filtration & Minerals, Inc.

STREET ADDRESS: 9785 Gateway Drive, Suite 1000

CITY: Reno STATE: Nevada ZIP: 89521

EMERGENCY TELEPHONE NO: (775) 824-7600 CHEMICAL FORMULA: Na2O, K2O, Al2O3, SiO2

CHEMICAL NAME: Sodium Potassium Aluminum Silicate TRADE NAME: Perlite

CHEMICAL FAMILY: Silicate MATERIAL USE: Filter Aid, Filler

NFPA: 1 – 0 – 0 – –

4-Extreme
3-High
2-Moderate
1-Slight
0-Insignificant

HMIS:
* Health
0 Flammability
0 Reactivity
E Protective Equipment
* REFER TO DATA ON MSDS

SECTION II: HAZARDOUS INGREDIENTS OF MATERIAL

INGREDIENT IDENTIFICATION	APPROXIMATE CONCENTRATION %	C.A.S. NUMBERS	OSHA PEL [ACGIH TLV]	LD50/ /LC 50 SPECIES AND ROUTE
Perlite	100%	93763-70-3	15mg/m3 Total dust 5 mg/m3 Respirable dust [10mg/m3 Total dust – ACGIH]	Not available

For sampling silica dusts refer to NIOSH Analytical Method 7500 or OSHA method ID 142

SECTION III: PROPERTIES

PHYSICAL STATE: Solid	ODOR AND APPEARANCE: Odorless, white powder		SPECIFIC GRAVITY: 2.3	BOILING POINT: Not Applicable
VAPOR PRESSURE (MM): Not Applicable	VAPOR DENSITY: Not applicable	pH: Neutral	SOLUBILITY/WATER: Nil	FREEZING POINT: Not Applicable
MELTING POINT: Not Determined	EVAPORATION RATE: Not Applicable			

SECTION IV – FIRE AND EXPLOSION HAZARD OF MATERIAL

FLAMMABILITY: YES NO X IF YES, UNDER WHICH CONDITIONS

MEANS OF EXTINCTION: Not Applicable	SPECIAL PROCEDURES: Not Applicable
FLASH POINT: Not Applicable	FLAMMABLE LIMITS: Not Applicable

SECTION V – HEALTH HAZARDS

Perlite is a naturally occurring volcanic glass consisting of fused sodium – potassium – aluminum silicate. Tests conducted on Celatom Perlite have not identified crystalline silica as being present above the detection limit (0.05%).

Although there are no published reports of adverse health effects from exposure to perlite dust, dust levels should be maintained below the OSHA Permissible Exposure Limit for perlite and respirators used when airborne dust is present.

MEDICAL CONDITIONS AGGRAVATED BY EXPOSURE
Pre-existing diseases of the upper respiratory tract and lung such as bronchitis, emphysema, and asthma

IMPORTANT HEALTH HAZARD DATA CONTINUES ON THE SECOND PAGE (BACK)

PAGE 2	MATERIAL NAME / IDENTIFIER: Celatom Perlite (all grades)

SECTION V – HEALTH HAZARDS CONT'D

ROUTE OF ENTRY: Inhalation (Chronic)	TARGET ORGANS: Lungs

EFFECTS OF ACUTE EXPOSURE TO PRODUCT: Upper respiratory irritant – May cause coughing or throat irritation.

EFFECTS OF CHRONIC EXPOSURE TO PRODUCT:

Although there are no reports of adverse health effects from exposure to perlite dust, inhalation of high concentrations of perlite dust or any other particulates for prolonged periods of time may cause lung damage.

Not listed as a carcinogen by IARC, NTP or OSHA

MSHA PEL: 0.5*10/(% respirable crystalline silica +2)	NIOSH REL: Crystalline silica (respirable quartz and cristobalite) 0.05 mg/m^3

SECTION VI – REACTIVITY DATA

CHEMICAL STABILITY: YES X NO	INCOMPATIBILITY TO OTHER SUBSTANCES YES X NO IF YES, WHICH ONES? Hydrofluoric Acid. Products containing Silica may react violently with Hydrofluoric Acid
REACTIVITY AND UNDER WHAT CONDITIONS: Not Applicable	HAZARDOUS DECOMPOSITION PRODUCTS: Not Applicable

SECTION VII – PRECAUTIONS FOR SAFE HANDLING AND USE

PERSONAL PROTECTIVE EQUIPMENT:

Adequate protective devices, such as respirators approved for mineral dusts, should be worn when airborne dust is present. NIOSH and MSHA approved respirators include 3M ™ 9900 and MSA (TN) Dustfoe 66.

GLOVES: Not normally necessary	RESPIRATORY: Note Above	EYE: Goggles to protect from dust
FOOTWEAR: Not necessary	CLOTHING: Not normally necessary	

ENGINEERING CONTROLS (E.G. VENTILATION, ENCLOSED PROCESS): Local – Control within recommended TLV/PEL. Refer to ACGIH publication "Industrial Ventilation" or similar publications for design of ventilation systems.

LEAK AND SPILL PROCEDURE: Vacuum clean spillage, wet sweep or wash away. Avoid creating dust.

WASTE DISPOSAL: Non-Biodegradable. Use solid waste disposal common to landfill type operations or in slurry to sumps. Not considered a hazardous waste under RCRA (40CFR Part 261).

HANDLING PROCEDURES: Avoid creating dust. Repair or properly dispose of broken bags.

STORAGE REQUIREMENTS: Store in a dry place to maintain product quality.

SPECIAL SHIPPING INSTRUCTIONS: None

SECTION VIII – FIRST AID MEASURES

SKIN: Not absorbed by the skin. May cause dryness. Use moisture renewing lotions if dryness occurs.

EYE: May cause irritation or inflammation. Wash with generous quantities of water. Consult physician if irritation persists.

INHALATION: Acute inhalation can cause dryness of the nasal passages and congestion of the upper respiratory tract. Remove to fresh air.

INGESTION: Short-term exposure not considered harmful. Drink generous amounts of water to reduce bulk and drying effects.

SECTION IX – PREPARATION DATE OF M.S.D.S.

PREPARED BY: Peter Lenz	TITLE: Director, Research & Development
PHONE NUMBER: (775) 024-7600	DATE: July 1, 2004

22345 Roethel Drive
Novi, MI 48375
248.344.1770
Fax 248.344.2654

Clayton GROUP SERVICES

May 03, 2005

Christopher McBee
DOUBLE EAGLE STEEL COATING COMPANY
3000 Miller Road
Dearborn, MI 48120-

Clayton Work Order No. 05040748

Reference:

Dear Christopher McBee:

Clayton Group Services received 1 sample on 4/19/2005 for the analyses presented in the following report.

Enclosed is a copy of the Chain-of-Custody record, acknowledging receipt of these samples. Please note that any unused portion of the samples will be discarded 30 days after the date of this report, unless you have requested otherwise.

This material is confidential and is intended solely for the person to whom it is addressed. If this is received in error, please contact the number provided below.

We appreciate the opportunity to assist you. If you have any questions concerning this report, please contact a Client Services Representative at (800) 806-5887.

Sincerely,

Karen Coonan
Client Services Representative

cc:

Clayton

CASE NARRATIVE

Date: *03-May-05*

CLIENT: DOUBLE EAGLE STEEL COATING COMPANY

Project:

Work Order No 05040748

All quality control results associated with this sample set were within acceptable limits and/or do not adversely affect the reported results, unless otherwise noted below.

The Total Organic Halogens analysis was subcontracted to Lancaster Laboratories, in Lancaster, PA. The actual method used was EPA 9023.

ANALYTICAL RESULTS

Clayton GROUP SERVICES

Date: *03-May-05*

CLIENT: DOUBLE EAGLE STEEL COATING COMPANY
Client Sample ID: FILTER CAKE DE05001
Work Order No: 05040748
Tag Number:
Project:
Collection Date: 4/18/2005
Lab ID: 05040748-001A
Matrix: SOLID

Analyses	Result	Reporting Limit	Qual	Units	DF	Date Analyzed	Analyst
FLASHPOINT; METHOD EPA 1010 (MODIFIED)							
Ignitability	>200	0		°F	1	4/25/2005	CLH
PCBS BY GC; METHOD EPA 8082							
Aroclor 1016	ND	330		µg/Kg	1	4/22/2005	BVP
Aroclor 1221	ND	330		µg/Kg	1	4/22/2005	BVP
Aroclor 1232	ND	330		µg/Kg	1	4/22/2005	BVP
Aroclor 1242	ND	330		µg/Kg	1	4/22/2005	BVP
Aroclor 1248	ND	330		µg/Kg	1	4/22/2005	BVP
Aroclor 1254	ND	330		µg/Kg	1	4/22/2005	BVP
Aroclor 1260	ND	330		µg/Kg	1	4/22/2005	BVP
TOTAL ORGANIC HALOGENS; METHOD EPA 9076							
Total Organic Halides (TOX)	1,900	90		mg/Kg-dry	1	4/28/2005	SUB
PAINT FILTER LIQUIDS TEST; METHOD EPA 9095A							
Free Liquid	Negative	0		Pos/Neg	1	5/2/2005	RAS
PH, SOIL OR WASTE; METHOD EPA 9045C							
pH	2.3	1.0		pH Units	1	4/27/2005 5:45:00 PM	RAS
REACTIVE CYANIDE, EPA SW 846 CHAPTER 7.3.3.2							
Reactive Cyanide	ND	0.10		mg/Kg	1	4/21/2005	HML
REACTIVE SULFIDE; EPA SW 846 CHAPTER 7.3.4.2							
Reactive Sulfide	ND	100		mg/Kg	1	4/21/2005	HML

Qualifiers:

ND - Not Detected at the Reporting Limit (RL).
J - Analyte detected below the Reporting Limit
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
E - Value above quantitation range
T - Tentatively Identified Compound (TIC)

ANALYTICAL RESULTS

Clayton GROUP SERVICES

Date: *03-May-05*

CLIENT: DOUBLE EAGLE STEEL COATING COMPANY
Client Sample ID: FILTER CAKE DE05001
Work Order No: 05040748
Tag Number:
Project:
Collection Date: 4/18/2005
Lab ID: 05040748-001B
Matrix: LEACHATE

Analyses	Result	Reporting Limit	Qual	Units	DF	Date Analyzed	Analyst
ICP METALS;LEACHATE: METHOD EPA 1311/6010B							
Arsenic	ND	0.10		mg/L	1	4/26/2005	CAW
Barium	0.81 TRL	0.10		mg/L	1	4/26/2005	CAW
Cadmium	ND	0.050		mg/L	1	4/26/2005	CAW
Chromium	0.54 TRL	0.10		mg/L	1	4/26/2005	CAW
Lead	ND	0.10		mg/L	1	4/26/2005	CAW
Selenium	ND	0.20		mg/L	1	4/26/2005	CAW
Silver	ND	0.020		mg/L	1	4/26/2005	CAW
MERCURY; LEACHED: METHOD EPA 1311/7470A							
Mercury	ND	0.0010		mg/L	1	4/26/2005	RS

Qualifiers:

ND - Not Detected at the Reporting Limit (RL).
J - Analyte detected below the Reporting Limit
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
E - Value above quantitation range
T - Tentatively Identified Compound (TIC)

Clayton Group Services

Date: *03-May-05*

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 05040748
Project:

QC SUMMARY REPORT

Method Blank

Sample ID: MB-18715 | Batch ID: 18715 | Units: mg/L | Analysis Date: 04/26/2005 | Prep Date: 04/26/2005
Client ID: | Run ID: ME_PE3C_050426A | SeqNo: 767516

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	ND	0.1									
Barium	ND	0.1									
Cadmium	ND	0.05									
Chromium	ND	0.1									
Lead	ND	0.1									
Selenium	ND	0.2									
Silver	ND	0.02									

Sample ID: MB-18715 | Batch ID: 18716 | Units: µg/L | Analysis Date: 04/26/2005 | Prep Date: 04/26/2005
Client ID: | Run ID: ME_CE5E_050426C | SeqNo: 767312

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Mercury	ND	0.2									

Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 05040748
Project:

QC SUMMARY REPORT
Method Blank

Sample ID: MB-18668 | Batch ID: 18668 | Units: µg/Kg | Analysis Date: 04/22/2005 | Prep Date: 04/21/2005
Client ID: | Run ID: PP_HP4D_050422A | SeqNo: 766014

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aroclor 1016	ND	330									
Aroclor 1221	ND	330									
Aroclor 1232	ND	330									
Aroclor 1242	ND	330									
Aroclor 1248	ND	330									
Aroclor 1254	ND	330									
Aroclor 1260	ND	330									
Surr: Decachlorobiphenyl	14	0	16.7	0	83.8	20.6	188	0			
Surr: Tetrachloro-m-xylene	12	0	16.7	0	71.9	6.8	140	0			

Sample ID: MB-R65740 | Batch ID: R65740 | Units: pH Units | Analysis Date: 04/27/2005 5:43:00 PM | Prep Date:
Client ID: | Run ID: WC_OR17Q_050427A | SeqNo: 768181

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
pH	6.2	1									

Sample ID: MB-R65477 | Batch ID: R65477 | Units: mg/Kg | Analysis Date: 04/21/2005 | Prep Date:
Client ID: | Run ID: WC_PE10J_050421A | SeqNo: 765392

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Reactive Cyanide	ND	0.1									

Clayton GROUP SERVICES

Qualifiers:
ND - Not Detected at the Reporting Limit
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S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 05040748
Project:

QC SUMMARY REPORT
Method Blank

Sample ID: MB-R65476 | Batch ID: R65476 | Units: mg/Kg | Analysis Date: 04/21/2005 | Prep Date:
Client ID: | Run ID: WC_MA7G_050421A | SeqNo: 785383

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Reactive Sulfide	ND	100									

Qualifiers:
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S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

Clayton Group Services

Clayton Group Services

Date: 03-May-05

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 05040748
Project:

QC SUMMARY REPORT

Laboratory Control Spike

Sample ID: LCS-18715 | Batch ID: 18715 | Units: mg/L | Analysis Date: 04/26/2005 | Prep Date: 04/26/2005
Client ID: | Run ID: ME_PE3C_050426A | SeqNo: 787517

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	4.88	0.1	5	0	97.6	84	113	0			
Barium	4.88	0.1	5	0	97.6	87.6	112	0			
Cadmium	4.87	0.05	5	0	97.4	85.9	113	0			
Chromium	4.79	0.1	5	0	95.8	84.6	112	0			
Lead	4.8	0.1	5	0	96	86.2	111	0			
Selenium	4.97	0.2	5	0	99.4	82	114	0			
Silver	4.97	0.02	5	0	99.4	77.9	116	0			

Sample ID: LCS-18716 | Batch ID: 18716 | Units: µg/L | Analysis Date: 04/26/2005 | Prep Date: 04/26/2005
Client ID: | Run ID: ME_CE5E_050426C | SeqNo: 787313

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Mercury	1.76	0.2	2	0	88	75.3	124	0			

Sample ID: LCS-18668 | Batch ID: 18668 | Units: µg/Kg | Analysis Date: 04/22/2005 | Prep Date: 04/21/2005
Client ID: | Run ID: PP_HP4D_050422A | SeqNo: 786015

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aroclor 1016	225.3	330	333	0	67.7	28.9	142	0			J
Aroclor 1260	250.7	330	333	0	75.3	38.7	148	0			J
Surr: Decachlorobiphenyl	14	0	16.7	0	83.8	20.8	188	0			
Surr: Tetrachloro-m-xylene	10.33	0	16.7	0	61.9	6.8	140	0			

Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

Clayton Group Services

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 05040748
Project:

QC SUMMARY REPORT

Laboratory Control Spike

Sample ID: LCS-R65477 | Batch ID: R65477 | Units: mg/Kg | Analysis Date: 04/21/2005 | Prep Date:
Client ID: | Run ID: WC_PE10J_050421A | SeqNo: 765393

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Reactive Cyanide	6.8	0.1	100	0	6.8	1.41	13.3	0			

Sample ID: LCS-R65476 | Batch ID: R65476 | Units: mg/Kg | Analysis Date: 04/21/2005 | Prep Date:
Client ID: | Run ID: WC_MA7G_050421A | SeqNo: 765384

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Reactive Sulfide	70.52	100	91.38	0	77.2	4.19	106	0			J

Qualifiers:
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J - Analyte detected below Reporting Limit
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

Clayton Group Services

Clayton Group Services

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 05040748
Project:

Date: *03-May-05*

QC SUMMARY REPORT

Sample Matrix Spike

Sample ID: 05040691-002B-MS | Batch ID: 18715 | Units: mg/L | Analysis Date: 04/26/2005 | Prep Date: 04/26/2005
Client ID: | Run ID: ME_PE3C_050426A | SeqNo: 767520

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	4.93	0.1	5	0	98.5	82.5	120	0			
Barium	5.23	0.1	5	0.314	98.3	81.1	116	0			
Cadmium	4.89	0.05	5	0	97.8	81.6	115	0			
Chromium	4.87	0.1	5	0	97.4	80.9	112	0			
Lead	4.83	0.1	5	0	96.6	80.5	113	0			
Selenium	4.92	0.2	5	0	98.4	81.3	120	0			
Silver	4.99	0.02	5	0	99.8	70.1	123	0			

Sample ID: 05040691-002B-MSD | Batch ID: 18715 | Units: mg/L | Analysis Date: 04/26/2005 | Prep Date: 04/26/2005
Client ID: | Run ID: ME_PE3C_050426A | SeqNo: 767521

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	4.89	0.1	5	0	97.8	82.5	120	4.93	0.815	8.61	
Barium	5.17	0.1	5	0.314	97.1	81.1	116	5.23	1.16	6.14	
Cadmium	4.78	0.05	5	0	95.6	81.6	115	4.89	2.28	5.93	
Chromium	4.83	0.1	5	0	96.6	80.9	112	4.67	0.825	5.53	
Lead	4.74	0.1	5	0	94.8	80.5	113	4.83	1.88	5.79	
Selenium	4.94	0.2	5	0	98.8	81.3	120	4.92	0.406	10.6	
Silver	5.02	0.02	5	0	100	70.1	123	4.99	0.599	10.2	

Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 05040748
Project:

QC SUMMARY REPORT

Sample Matrix Spike

Sample ID: 05040978-001A-MS | Batch ID: 18716 | Units: µg/L | Analysis Date: 04/26/2005 | Prep Date: 04/26/2005
Client ID: | Run ID: ME_CE5E_050426C | SeqNo: 767322

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Mercury	1.89	0.2	2	0	94.5	69.7	126	0			

Sample ID: 05040978-001A-MSD | Batch ID: 18716 | Units: µg/L | Analysis Date: 04/26/2005 | Prep Date: 04/26/2005
Client ID: | Run ID: ME_CE5E_050426C | SeqNo: 767323

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Mercury	1.81	0.2	2	0	90.5	69.7	126	1.89	4.32	21.8	

Sample ID: 05040748-001AMS | Batch ID: 18668 | Units: µg/Kg | Analysis Date: 04/22/2005 | Prep Date: 04/21/2005
Client ID: FILTER CAKE DE05001 | Run ID: PP_HP4D_050422A | SeqNo: 766019

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aroclor 1016	227.7	330	333	0	68.4	13	148	0			J
Aroclor 1260	270.7	330	333	0	81.3	19.1	155	0			J
Surr: Decachlorobiphenyl	15	0	16.7	0	89.8	8.72	160	0			
Surr: Tetrachloro-m-xylene	9.667	0	16.7	0	57.9	0.5	132	0			

Clayton Laboratory Services

Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 05040748
Project:

QC SUMMARY REPORT
Sample Matrix Spike Duplicate

Sample ID: 050-40748-001AMSD Batch ID: 16668 Units: pg/Kg Analysis Date: 04/22/2005 Prep Date: 04/21/2005
Client ID: FILTER CAKE DES001 Run ID: PP_HP4D_050422A SeqNo: 786020

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aroclor 1016	225.7	330	333	0	67.8	13	145	227.7	0.882	75.2	J
Aroclor 1260	266.7	330	333	0	80.1	19.1	155	270.7	1.49	70.3	J
Surr: Decachlorobiphenyl	14.67	0	16.7	0	87.8	8.72	160	15	2.25	0	
Surr: Tetrachloro-m-xylene	10.33	0	16.7	0	61.9	0.5	132	9.667	6.87	0	

Clayton Group Services

Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

Clayton Group Services

Date: 03-May-05

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 05040748
Project:
Analysis: PCBs; Soil: Method 8082

QC SUMMARY REPORT
SURROGATE RECOVERIES

Sample ID	CL10BZ2	XYL2456CLM						
05040630-001A	71.9	63.9						
05040641-008A	67.9	67.9						
05040748-001A	75.8	65.9						
05040748-001AMS	89.8	57.9						
05040748-001AMS	87.8	61.9						
05040778-001A	39.9	35.9						
05040778-002A	55.9	47.9						
LCS-18668	83.8	61.9						
MB-18668	83.8	71.9						

Acronym		Surrogate	QC Limits
CL10BZ2	=	Decachlorobiphenyl	8.72-160
XYL2456CLM	=	Tetrachloro-m-xylene	0.5-132

* Surrogate recovery outside acceptance limits

Clayton GROUP SERVICES

REQUEST FOR LABORATORY ANALYTICAL SERVICES

IMPORTANT
Date Results Requested: _____
Rush Charges Authorized? ☐ Yes ☐ No
☐ Fax or ☐ E-mail Results
E-mail address: _____

Page ___ of ___
For Clayton Use Only
Clayton Lab Project No.

REPORT RESULTS TO
Name: CHRISTOPHER MAGEE
Company: Double Eagle
Mailing Address: 3100 S Miller
City, State, Zip: Des Moines IA
Telephone No.:
FAX No.:
Client Job No.:
Dept.: Environmental

SEND INVOICE TO
Purchase Order No.:
Name:
Company:
Dept.:
Address:
City, State, Zip:

Special instructions and/or specific regulatory requirements:
(method, limit of detection, etc.)

* Explanation of Preservative

Samples are: (check if applicable)
☐ Drinking Water
☐ Groundwater
☐ Wastewater

ANALYSIS REQUESTED
(Enter an "X" in the box below to indicate request. Enter a "P" if Preservative added.*)

CLIENT SAMPLE IDENTIFICATION	DATE SAMPLED	TIME SAMPLED	MATRIX/ MEDIA	AIR VOLUME (specify units)	# Number of Containers	TCLP MTL	RCT	TCLP FLD	TOX						FOR LAB USE ONLY
FILTER CAKE-DE0501	4/18		SOLID		2	X	X	X	X						

Haven't sent out
I didn't send these
Wendy

CHAIN OF CUSTODY
Collected by: JOE CHALLOY (print) — Collector's Signature:
Relinquished by: CHRIS MAGEE — Date/Time 4/19
Received by: 4/19/05 — Date/Time
Relinquished by: — Date/Time
Received by: — Date/Time
Method of Shipment:
Received at Lab by: — Date/Time
Authorized by: Christopher Magee (Client Signature MUST Accompany Shipment) — Date 4/19/05
Sample Condition Upon Receipt: ☐ Acceptable ☐ Other (explain)

Please return completed form and samples to one of the Clayton Group Services, Inc. labs listed below:

Detroit Regional Lab
22345 Roethel Drive
Novi, MI 48375
(800) 808-6887
(248) 344-1770
FAX (248) 344-2855

Atlanta Regional Lab
3380 Chastain Meadows Parkway, Suite 300
Kennesaw, GA 30144
(800) 252-9919
(770) 499-7500
FAX (770) 423-4990

Seattle Regional Lab
4636 E. Marginal Way S., Suite 215
Seattle, WA 98134
(800) 568-7755
(206) 763-7364
FAX (206) 763-4199

DISTRIBUTION:
White = Clayton Laboratory
Yellow = Clayton Accounting
Pink = Client Copy

9/97 20K

FAX

Double Eagle Steel Coating Company
3000 Miller Road
Dearborn, MI 48120

Date November 30, 2005

Number of pages including cover sheet 13

To: Pam C.

Re: **Additional Analytical – Non Haz Liquid Industrial Waste w/Perlite**

Phone

Fax Phone **313-923-8295**

CC:

From:

Christopher McBee

Phone **313-363-1902, 313-203-9829**

Fax Phone **313-203-9705**

REMARKS:

☐ Urgent ☒ For your review ☐ Reply ASAP ☐ Please comment

Hello Pam.

Attached is additional Analytical. Note that we use literally tons of Potassium Chloride in our process every day. I attribute the apparent total halogen value in the first analytical report to the high amount of chloride we introduce to the system. Additionally, we don't use any halogenated solvents in any of our maintenance or coating processes. The attached analytical is TCLP VOC and SVOC and shows non-detect for all analytes tested.

I hope this answers any questions you have. If not, call me at 313-363-1902.

Regards,

Chris McBee

Environmental Engineer

Double Eagle Steel Company.

THE ENVIRONMENTAL QUALITY COMPANY

Customer Account: 004077
Fax: (734) 547-2502

John Leonard

ENVIRONMENTAL MANAGER
EQ INDUSTRIAL SERVICES, INC.
2701 NORTH I-94 SERVICE DRIVE
YPSILANTI, MI 48198

Customer Approval/Quote Confirmation
EQ Detroit, Inc. (MID980991566)
1923 Frederick
Detroit, MI 48211
December 5, 2005

This Approval/Quote Confirmation acknowledges the acceptability of the waste described and ensures that the EQ environmental protection facility identified above has the appropriate permit(s) issued by federal and state regulatory agencies to properly transport, treat and/or dispose of the waste material(s) listed below. The Approval(s) are based upon information supplied to EQ by your company. The generator identified is ultimately responsible for the accuracy and completeness of the characterization information provided and any other information that was provided during the technical approval process. The generator must notify the EQ Resource Team immediately upon knowledge of any changes to this information. The Approval(s) and Quote(s) listed below will expire on the date(s) noted. Any new Approvals obtained from EQ on future business will be valid for a period of one (1) year from the date of issuance. For further information, refer to EQ's Standard Terms and Conditions (attached). Please prepare any Purchase/Work Orders for EQ-The Environmental Quality Company. To coordinate delivery of your waste stream(s), please contact our Scheduling Department at 1-800-495-6059.

I, _____ hereby certify that I have reviewed the information contained in this confirmation
(Authorized Customer Signature)
and agree to its contents and terms and conditions as set forth.

Printed Name: John Leonard Date: 12/5/05 Purchase/Work Order: _____

Please note the following:

- *Quoted bulk disposal charges for solid materials will be billed by the cubic yard if waste density is less than 2,000 pounds per cubic yard. If the waste density is greater than 2,000 pounds per cubic yard then bulk disposal charges will be billed by the ton regardless of the approved container. EQ personnel will monitor all shipments.*
- *An insurance surcharge of 1.5% will apply to all transportation, disposal and services provided.*
- *The Michigan DEQ will assess a manifest fee for all hazardous waste manifests used in the State of Michigan.*

Approval: **KF05946**

Generator: **MID981092190 DOUBLE EAGLE** Approval Expires On: **12/05/2006**
Common Name: **BASEMENT CLEANUP-PERLITE W/FILTERCAKE**
Waste Codes: Primary - D29L Secondary -

Type of Service

	Price	Unit	Min. Qty.
Treatment and Disposal - Additional $0.002 Perpetual Care Surcharge per unit	$0.33	GAL	N/A

YOUR BUSINESS. OUR SOLUTIONS. A PRODUCTIVE PARTNERSHIP.

Mail or fax to: EQ Detroit, Inc., 1923 Frederick, Detroit, MI 48211. Phone: 1-800-495-6059 Fax: 1-313-923-3375

4077

Form 1029 Rev. 2/03

THE ENVIRONMENTAL QUALITY COMPANY

Customer Account: 004077
Fax: (734) 547-2502

John Leonard

ENVIRONMENTAL MANAGER
EQ INDUSTRIAL SERVICES, INC.
2701 NORTH I-94 SERVICE DRIVE
YPSILANTI, MI 48198

Customer Approval/Quote Confirmation

EQ Detroit, Inc. (MID980991566)
1923 Frederick
Detroit, MI 48211
December 5, 2005

This Approval/Quote Confirmation acknowledges the acceptability of the waste described and ensures that the EQ environmental protection facility identified above has the appropriate permit(s) issued by federal and state regulatory agencies to properly transport, treat and/or dispose of the waste material(s) listed below. The Approval(s) are based upon information supplied to EQ by your company. The generator identified is ultimately responsible for the accuracy and completeness of the characterization information provided and any other information that was provided during the technical approval process. The generator must notify the EQ Resource Team immediately upon knowledge of any changes to this information. The Approval(s) and Quote(s) listed below will expire on the date(s) noted. Any new Approvals obtained from EQ on future business will be valid for a period of one (1) year from the date of issuance. For further information, refer to EQ's Standard Terms and Conditions (attached). Please prepare any Purchase/Work Orders for EQ-The Environmental Quality Company. To coordinate delivery of your waste stream(s), please contact our Scheduling Department at 1-800-495-6059.

I, _____ hereby certify that I have reviewed the information contained in this confirmation
(Authorized Customer Signature)
and agree to its contents and terms and conditions as set forth.

Printed Name: _____ Date: _____ Purchase/Work Order: _____

Please note the following:

- *Quoted bulk disposal charges for solid materials will be billed by the cubic yard if waste density is less than 2,000 pounds per cubic yard. If the waste density is greater than 2,000 pounds per cubic yard then bulk disposal charges will be billed by the ton regardless of the approved container. EQ personnel will monitor all shipments.*
- *An insurance surcharge of 1.5% will apply to all transportation, disposal and services provided.*
- *The Michigan DEQ will assess a manifest fee for all hazardous waste manifests used in the State of Michigan.*

Approval: **KF05946** Approval Expires On: **12/05/2006**

Generator: **MID981092190 DOUBLE EAGLE**
Common Name: **BASEMENT CLEANUP-PERLITE W/FILTERCAKE**
Waste Codes: Primary - **029L** Secondary -

Type of Service	Price	Unit	Min. Qty.
Treatment and Disposal - Additional $0.002 Perpetual Care Surcharge per unit	**$0.33**	**GAL**	**N/A**

YOUR BUSINESS. OUR SOLUTIONS. A PRODUCTIVE PARTNERSHIP®

Mail or fax to: EQ Detroit, Inc., 1923 Frederick, Detroit, MI 48211, Phone: 1-800-495-6059 Fax: 1-313-923-3375

FAX

Double Eagle Steel Coating Company
3000 Miller Road
Dearborn, MI 48120

Date November 30, 2005

Number of pages including cover sheet 13

To: Pam C.

From: **Christopher McBee**

Re: **Additional Analytical – Non Haz Liquid Industrial Waste w/Perlilte**

Phone

Fax Phone **313-923-8295**

CC:

Phone **313-363-1902, 313-203-9829**

Fax Phone **313-203-9705**

REMARKS:

☐ Urgent ☒ For your review ☐ Reply ASAP ☐ Please comment

Hello Pam.

Attached is additional Analytical. Note that we use literally tons of Potassium Chloride in our process every day. I attribute the apparent total halogen value in the first analytical report to the high amount of chloride we introduce to the system. Additionally, we don't use any halogenated solvents in any of our maintenance or coating processes. The attached analytical is TCLP VOC and SVOC and shows non-detect for all analytes tested.

I hope this answers any questions you have. If not, call me at 313-363-1902.

Regards,

Chris McBee

Environmental Engineer

Double Eagle Steel Company.

VE OSCIL ... FILTER CAKE

VOC, SVOC

22345 Roethel Drive
Novi, MI 48375
248.344.1770
Fax 248.344.2654

Clayton GROUP SERVICES

May 11, 2005

Christopher McBee
DOUBLE EAGLE STEEL COATING COMPANY
3000 Miller Road
Dearborn, MI 48120-

Clayton Work Order No. 05050236

Reference: Filter Cake

Dear Christopher McBee:

Clayton Group Services received 1 sample on 5/6/2005 for the analyses presented in the following report.

Enclosed is a copy of the Chain-of-Custody record, acknowledging receipt of these samples. Please note that any unused portion of the samples will be discarded 30 days after the date of this report, unless you have requested otherwise.

This material is confidential and is intended solely for the person to whom it is addressed. If this is received in error, please contact the number provided below.

We appreciate the opportunity to assist you. If you have any questions concerning this report, please contact a Client Services Representative at (800) 806-5887.

Sincerely,

Karen Coonan

Karen Coonan
Client Services Representative

cc:

DE 05005 DOOR 10 FILTER CAKE VOC, SVOC

Clayton GROUP SERVICES

CASE NARRATIVE

Date: *11-May-05*

CLIENT: DOUBLE EAGLE STEEL COATING COMPANY

Project: Filter Cake

Work Order No 05050236

Unless otherwise noted below, all quality control results associated with this sample set were within acceptable limits and/or do not adversely affect the reported results.

Analytical Comments for Method 8270L, sample LCS-18910: Please note that the laboratory control spike (LCS) recovery of one or more analytes was above statistical limits. The matrix spike/duplicate (MS/MSD) passed the LCS criteria. The results are not affected.

Clayton GROUP SERVICES

ANALYTICAL RESULTS

Date: *11-May-05*

CLIENT: DOUBLE EAGLE STEEL COATING COMPANY
Work Order No: 05050236
Project: Filter Cake
Lab ID: 05050236-001B

Client Sample ID: FILTER CAKE
Tag Number:
Collection Date: 5/6/2005 12:00:00 PM
Matrix: LEACHATE

Analyses	Result	Reporting Limit	Qual	Units	DF	Date Analyzed	Analyst
GC/MS TCLP VOLATILES; METHOD EPA 1311/8260B							
Benzene	ND	0.20		mg/L	200	5/10/2005 8:31:00 PM	DRS
2-Butanone	ND	4.0		mg/L	200	5/10/2005 8:31:00 PM	DRS
Carbon tetrachloride	ND	0.20		mg/L	200	5/10/2005 8:31:00 PM	DRS
Chlorobenzene	ND	0.20		mg/L	200	5/10/2005 8:31:00 PM	DRS
Chloroform	ND	0.20		mg/L	200	5/10/2005 8:31:00 PM	DRS
1,2-Dichloroethane	ND	0.20		mg/L	200	5/10/2005 8:31:00 PM	DRS
1,1-Dichloroethene	ND	0.20		mg/L	200	5/10/2005 8:31:00 PM	DRS
Tetrachloroethene	ND	0.20		mg/L	200	5/10/2005 8:31:00 PM	DRS
Trichloroethene	ND	0.20		mg/L	200	5/10/2005 8:31:00 PM	DRS
Vinyl chloride	ND	0.20		mg/L	200	5/10/2005 8:31:00 PM	DRS
GCMS TCLP SEMIVOLATILES; METHOD EPA 1311/8270C							
1,4-Dichlorobenzene	ND	0.025		mg/L	0.5	5/10/2005 9:06:00 PM	LL
2,4-Dinitrotoluene	ND	0.025		mg/L	0.5	5/10/2005 9:06:00 PM	LL
Hexachlorobenzene	ND	0.025		mg/L	0.5	5/10/2005 9:06:00 PM	LL
Hexachlorobutadiene	ND	0.025		mg/L	0.5	5/10/2005 9:06:00 PM	LL
Hexachloroethane	ND	0.025		mg/L	0.5	5/10/2005 9:06:00 PM	LL
Nitrobenzene	ND	0.025		mg/L	0.5	5/10/2005 9:06:00 PM	LL
Pentachlorophenol	ND	0.10		mg/L	0.5	5/10/2005 9:06:00 PM	LL
Pyridine	ND	0.025		mg/L	0.5	5/10/2005 9:06:00 PM	LL
2,4,5-Trichlorophenol	ND	0.25		mg/L	0.5	5/10/2005 9:06:00 PM	LL
2,4,6-Trichlorophenol	ND	0.025		mg/L	0.5	5/10/2005 9:06:00 PM	LL
Cresols, Total	ND	0.25		mg/L	0.5	5/10/2005 9:06:00 PM	LL

Qualifiers:

ND - Not Detected at the Reporting Limit (RL).
J - Analyte detected below the Reporting Limit
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
E - Value above quantitation range
T - Tentatively Identified Compound (TIC)

Clayton Group Services

Date: *11-May-05*

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 05050236
Project: Filter Cake

QC SUMMARY REPORT
Method Blank

Sample ID: 05050000-BLK6 Batch ID: R66313 Units: mg/L Analysis Date: 5/10/2005 5:56:00 PM Prep Date:
Client ID: Run ID: MS_HP10J_050506B SeqNo: 774702

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Benzene	ND	0.02									
2-Butanone	ND	0.4									
Carbon tetrachloride	ND	0.02									
Chlorobenzene	ND	0.02									
Chloroform	ND	0.02									
1,2-Dichloroethane	ND	0.02									
1,1-Dichloroethene	ND	0.02									
Tetrachloroethene	ND	0.02									
Trichloroethene	ND	0.02									
Vinyl chloride	ND	0.02									
Surr: 4-Bromofluorobenzene	0.9912	0	1	0	99.1	82.7	115	0			
Surr: 1,2-Dichloroethane-d4	0.9998	0	1	0	100	74.4	120	0			
Surr: Toluene-d8	0.9814	0	1	0	98.1	81.8	118	0			
Surr: Pentafluorobenzene	1.04	0	1	0	104	81.9	122	0			

Qualifiers: ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 05050236
Project: Filter Cake

QC SUMMARY REPORT
Method Blank

Sample ID: MB-18910 Batch ID: 18910 Units: mg/L Analysis Date: 5/10/2005 11:04:00 PM Prep Date: 5/10/2005
Client ID: Run ID: MS_HP5E_050510B SeqNo: 774616

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
1,4-Dichlorobenzene	ND	0.025									
2,4-Dinitrotoluene	ND	0.025									
Hexachlorobenzene	ND	0.025									
Hexachlorobutadiene	ND	0.025									
Hexachloroethane	ND	0.025									
Nitrobenzene	ND	0.025									
Pentachlorophenol	ND	0.1									
Pyridine	ND	0.025									
2,4,5-Trichlorophenol	ND	0.25									
2,4,6-Trichlorophenol	ND	0.025									
Cresols, Total	ND	0.25									
Surr: 2,4,6-Tribromophenol	0.8274	0	0.75	0	110	22.2	123	0			
Surr: 2-Fluorobiphenyl	0.4705	0	0.5	0	94.1	21.9	111	0			
Surr: 2-Fluorophenol	0.6192	0	0.75	0	82.6	7.54	91.2	0			
Surr: Nitrobenzene-d5	0.4479	0	0.5	0	89.6	24.1	102	0			
Surr: Phenol-d5	0.65	0	0.75	0	86.7	1.91	101	0			
Surr: Terphenyl-d14	0.6551	0	0.5	0	131	33.5	126	0			S

Clayton GROUP SERVICES

Qualifiers: ND - Not Detected at the Reporting Limit; J - Analyte detected below Reporting Limit; S - Spike Recovery outside accepted recovery limits; R - RPD outside accepted recovery limits; B - Analyte detected in the associated Method Blank

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 05050236
Project: Filter Cake

QC SUMMARY REPORT
Method Blank

Sample ID: MB-18910 FL1 | Batch ID: 18910 | Units: mg/L | Analysis Date: 5/10/2005 5:09:00 PM | Prep Date: 5/10/2005
Client ID: | Run ID: MS_HP5E_050510B | SeqNo: 774607

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
1,4-Dichlorobenzene	ND	0.025									
2,4-Dinitrotoluene	ND	0.025									
Hexachlorobenzene	ND	0.025									
Hexachlorobutadiene	ND	0.025									
Hexachloroethane	ND	0.025									
Nitrobenzene	ND	0.025									
Pentachlorophenol	ND	0.1									
Pyridine	ND	0.025									
2,4,5-Trichlorophenol	ND	0.25									
2,4,6-Trichlorophenol	ND	0.025									
Cresols, Total	ND	0.25									
Surr: 2,4,6-Tribromophenol	0.725	0	0.75	0	96.7	22.2	123	0			
Surr: 2-Fluorobiphenyl	0.408	0	0.5	0	81.6	21.9	111	0			
Surr: 2-Fluorophenol	0.5405	0	0.75	0	72.1	7.54	91.2	0			
Surr: Nitrobenzene-d5	0.4008	0	0.5	0	80.2	24.1	102	0			
Surr: Phenol-d5	0.5353	0	0.75	0	71.4	1.91	101	0			
Surr: Terphenyl-d14	0.5256	0	0.5	0	105	33.5	126	0			

Clayton GROUP SERVICES

Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

Clayton Group Services

Date: *11-May-05*

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 05050236
Project: Filter Cake

QC SUMMARY REPORT
Laboratory Control Spike

Sample ID: LCS-18910 Batch ID: 18910 Units: mg/L Analysis Date: 5/10/2005 5:49:00 PM Prep Date: 5/10/2005
Client ID: Run ID: MS_HP5E_050510B SeqNo: 774608

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
1,4-Dichlorobenzene	0.3343	0.025	0.5	0	66.9	20.2	68.6	0			
2,4-Dinitrotoluene	0.5467	0.025	0.5	0	109	48.9	115	0			
Hexachlorobenzene	0.4943	0.025	0.5	0	98.9	42.9	124	0			
Hexachlorobutadiene	0.4283	0.025	0.5	0	85.7	11.2	82.6	0			S
Hexachloroethane	0.3874	0.025	0.5	0	77.5	12.1	71	0			S
Nitrobenzene	0.4534	0.025	0.5	0	90.7	28.5	94	0			
Pentachlorophenol	0.4759	0.1	0.5	0	95.2	20.4	122	0			
Pyridine	0.2898	0.025	0.5	0	58	0.5	66.2	0			
2,4,5-Trichlorophenol	0.4814	0.25	0.5	0	96.3	31.8	103	0			
2,4,6-Trichlorophenol	0.4899	0.025	0.5	0	98	32.2	100	0			
Cresols, Total	0.831	0.25	1	0	83.1	32.5	94	0			
Surr: 2,4,6-Tribromophenol	0.911	0	0.75	0	121	22.2	123	0			
Surr: 2-Fluorobiphenyl	0.5042	0	0.5	0	101	21.9	111	0			
Surr: 2-Fluorophenol	0.5504	0	0.75	0	73.4	7.54	91.2	0			
Surr: Nitrobenzene-d5	0.4539	0	0.5	0	90.8	24.1	102	0			
Surr: Phenol-d5	0.5871	0	0.75	0	78.3	1.91	101	0			
Surr: Terphenyl-d14	0.6403	0	0.5	0	128	33.5	126	0			S

Please note that the laboratory control spike (LCS) recovery of one or more analytes was above statistical limits. The matrix spike/duplicate (MS/MSD) passed the LCS criteria. The results are not affected.

Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 05050236
Project: Filter Cake

QC SUMMARY REPORT
Sample Matrix Spike Duplicate

Surr: Pentafluorobenzene	47.77	0	50	0	95.5	81.7	135	52.41	9.26	6.63	R

Sample ID: 05050236-001BMS Batch ID: 18910 Units: mg/L Analysis Date: 5/10/2005 9:45:00 PM Prep Date: 5/10/2005
Client ID: FILTER CAKE Run ID: MS_HP5E_050510B SeqNo: 774614

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
1,4-Dichlorobenzene	0.275	0.025	0.5	0	55	0.5	123	0			
2,4-Dinitrotoluene	0.4528	0.025	0.5	0	90.6	12.3	142	0			
Hexachlorobenzene	0.4274	0.025	0.5	0	85.5	0.5	157	0			
Hexachlorobutadiene	0.3262	0.025	0.5	0	65.2	0.5	122	0			
Hexachloroethane	0.3026	0.025	0.5	0	60.5	2.4	109	0			
Nitrobenzene	0.3543	0.025	0.5	0	70.9	15.8	125	0			
Pentachlorophenol	0.4315	0.1	0.5	0	86.3	0.5	156	0			
Pyridine	0.2477	0.025	0.5	0	49.5	0.5	110	0			
2,4,5-Trichlorophenol	0.406	0.25	0.5	0	81.2	5.88	137	0			
2,4,6-Trichlorophenol	0.3786	0.025	0.5	0	75.7	3.3	140	0			
Cresols, Total	0.6342	0.25	1	0	63.4	7.02	134	0			
Surr: 2,4,6-Tribromophenol	0.7529	0	0.75	0	100	22.2	123	0			
Surr: 2-Fluorobiphenyl	0.366	0	0.5	0	73.2	21.9	111	0			
Surr: 2-Fluorophenol	0.4371	0	0.75	0	58.3	7.54	91.2	0			
Surr: Nitrobenzene-d5	0.3448	0	0.5	0	69	24.1	102	0			
Surr: Phenol-d5	0.4696	0	0.75	0	62.6	1.91	101	0			
Surr: Terphenyl-d14	0.5467	0	0.5	0	109	33.5	126	0			

Clayton Group Services

Qualifiers: ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 05050236
Project: Filter Cake

QC SUMMARY REPORT
Sample Matrix Spike Duplicate

Sample ID: 05050236-001BMSD Batch ID: 18910 Units: mg/L Analysis Date: 5/10/2005 10:24:00 PM Prep Date: 5/10/2005
Client ID: FILTER CAKE Run ID: MS_HP5E_050510B SeqNo: 774615

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
1,4-Dichlorobenzene	0.2262	0.025	0.5	0	45.2	0.5	123	0.275	19.5	58.3	
2,4-Dinitrotoluene	0.4153	0.025	0.5	0	83.1	12.3	142	0.4528	8.63	56.4	
Hexachlorobenzene	0.3955	0.025	0.5	0	79.1	0.5	157	0.4274	7.77	59.7	
Hexachlorobutadiene	0.2518	0.025	0.5	0	50.4	0.5	122	0.3282	25.7	61.6	
Hexachloroethane	0.2473	0.025	0.5	0	49.5	2.4	109	0.3026	20.1	70.2	
Nitrobenzene	0.2854	0.025	0.5	0	57.1	15.8	125	0.3543	21.5	56.9	
Pentachlorophenol	0.426	0.1	0.5	0	85.2	0.5	156	0.4315	1.28	71	
Pyridine	0.2222	0.025	0.5	0	44.4	0.5	110	0.2477	10.8	98.6	
2,4,5-Trichlorophenol	0.3051	0.25	0.5	0	61	5.88	137	0.406	28.4	54.5	
2,4,6-Trichlorophenol	0.2939	0.025	0.5	0	58.8	3.3	140	0.3788	25.2	54	
Cresols, Total	0.5155	0.25	1	0	51.5	7.02	134	0.6342	20.7	25	
Surr: 2,4,6-Tribromophenol	0.6738	0	0.75	0	89.8	22.2	123	0.7529	11.1	24.9	
Surr: 2-Fluorobiphenyl	0.285	0	0.5	0	57	21.9	111	0.366	24.9	45.2	
Surr: 2-Fluorophenol	0.3526	0	0.75	0	47	7.54	91.2	0.4371	21.4	50	
Surr: Nitrobenzene-d5	0.2827	0	0.5	0	56.5	24.1	102	0.3448	19.8	64.2	
Surr: Phenol-d5	0.3843	0	0.75	0	51.2	1.91	101	0.4696	20	32	
Surr: Terphenyl-d14	0.5321	0	0.5	0	106	33.5	126	0.5467	2.72	22.8	

Clayton GROUP SERVICES

Qualifiers: ND - Not Detected at the Reporting Limit; J - Analyte detected below Reporting Limit; S - Spike Recovery outside accepted recovery limits; R - RPD outside accepted recovery limits; B - Analyte detected in the associated Method Blank

Clayton Group Services

Date: 11-May-05

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 05050236
Project: Filter Cake
Analysis: Volatile Organics; Leached: Method 8260B

QC SUMMARY REPORT
SURROGATE RECOVERIES

Sample ID		BR4FBZ	BZMED8	DCA12D4				
05050000-BLK6		99.1	98.1	100				
05050236-001B		92.8	96.0	101				

Acronym		Surrogate	QC Limits
	=	Pentafluorobenzene	81.7-135
BR4FBZ	=	4-Bromofluorobenzene	87.2-110
BZMED8	=	Toluene-d8	90-111
DCA12D4	=	1,2-Dichloroethane-d4	80.5-119

* Surrogate recovery outside acceptance limits

Clayton Group Services

Date: 11-May-05

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 05050236
Project: Filter Cake
Analysis: Semivolatile Organics; Leached: Method 8270C

QC SUMMARY REPORT
SURROGATE RECOVERIES

Sample ID	NO2BZD5	PH246BR	PH2F	PHEN2F	PHEND14	PHENOLD5		
05050194-002B	126 *	231 *	66.4	70.9	100	129 *		
05050194-003B	55.5	81.3	48.6	56.4	103	48.5		
05050199-006B	50.6	88.0	46.6	53.7	91.1	50.6		
05050199-007B	57.9	122	50.0	62.1	132 *	52.1		
05050236-001B	55.4	65.2	47.5	52.3	97.6	50.1		
05050236-001BMS	69.0	100	58.3	73.2	109	62.6		
05050236-001BMS	56.5	89.8	47.0	57.0	106	51.2		
LCS-18910	90.8	121	73.4	101	128 *	78.3		
MB-18910	89.6	110	82.6	94.1	131 *	86.7		
MB-18910 FL1	80.2	96.7	72.1	81.6	105	71.4		

Acronym		Surrogate	QC Limits
NO2BZD5	=	Nitrobenzene-d5	24.1-102
PH246BR	=	2,4,6-Tribromophenol	22.2-123
PH2F	=	2-Fluorophenol	7.54-91.2
PHEN2F	=	2-Fluorobiphenyl	21.9-111
PHEND14	=	Terphenyl-d14	33.5-128
PHENOLD5	=	Phenol-d5	1.91-101

* Surrogate recovery outside acceptance limits

Clayton GROUP SERVICES

REQUEST FOR LABORATORY ANALYTICAL SERVICES

IMPORTANT
Date Results Requested: 5/11/05
Rush Charges Authorized? ☒ Yes ☐ No
☐ Fax or ☒ E-mail Results
E-mail address:

Page ____ of ____

For Clayton Use Only
Clayton Lab Project No.
0505022-16

REPORT RESULTS TO
Name: C. Allen
Company: Double Eagle
Mailing Address: 3222 Mitchell
City, State, Zip: Dearborn, MI 48120
Telephone No.: 313 563 1902
FAX No.:
Client Job No.:
Dept.:

SEND INVOICE TO
Purchase Order No.:
Name:
Company:
Dept.:
Address:
City, State, Zip:

Special instructions and/or specific regulatory requirements:
(method, limit of detection, etc.)

Samples are:
(check if applicable)
☐ Drinking Water
☐ Groundwater
☐ Wastewater

* Explanation of Preservative

ANALYSIS REQUESTED
(Enter an "X" in the box below to indicate request. Enter a "P" if Preservative added.*)

CLIENT SAMPLE IDENTIFICATION	DATE SAMPLED	TIME SAMPLED	MATRIX/ MEDIA	AIR VOLUME (specify units)	Number of Containers	TCLP VOC	TCLP SVOC										FOR LAB USE ONLY
Filter cake	5/6	12:00	Solid			X	X										

CHAIN OF CUSTODY
Collected by: C. Allen (print) — Collector's Signature:
Relinquished by: C. Allen — Date/Time 5/6 12:00 — Received by: — Date/Time
Relinquished by: — Date/Time — Received by: — Date/Time
Method of Shipment: — Received at Lab by: Dan — Date/Time 5/6
Authorized by: C. Allen (Client Signature MUST Accompany Request) — Date 5/6/05 — Sample Condition Upon Receipt: ☒ Acceptable ☐ Other (explain) 212

7.1

Please return completed form and samples to one of the Clayton Group Services, Inc. labs listed below:

Detroit Regional Lab
22345 Roethel Drive
Novi, MI 48375
(800) 808-5887
(248) 344-1770
FAX (248) 344-2655

Atlanta Regional Lab
3380 Chastain Meadows Parkway, Suite 300
Kennesaw, GA 30144
(800) 252-9919
(770) 499-7500
FAX (770) 423-4990

Seattle Regional Lab
4636 E. Marginal Way S., Suite 215
Seattle, WA 98134
(800) 568-7755
(206) 763-7364
FAX (206) 763-4189

DISTRIBUTION:
White = Clayton Laboratory
Yellow = Clayton Accounting
Pink = Client Copy

9/97 20K

THE ENVIRONMENTAL QUALITY COMPANY®

Land Disposal Restriction & Certification Form

EQ Detroit, Inc. (MID980991566)
1923 Frederick
Detroit, MI 48211
December 7, 2005

Generator: DOUBLE EAGLE (MID981092190)
3000 MILLER ROAD
DEARBORN, MI 48120

State Manifest #: MI9509332 **Manifest Doc. #:**

Manifest Line: 1A Non-WasteWater **Approval:** LF051448

U.S. EPA Hazardous Waste Code(s): **Subcategory:**
D002

Reference Number(s) of Hazardous Constituents contained in the waste:

How Must the Waste Be Managed?

A THIS RESTRICTED WASTE REQUIRES TREATMENT TO THE APPLICABLE STANDARD.

This waste must be treated to the applicable performance based treatment standard set forth in 40CFR Part 268 Subpart C and Subpart D, 268.40 or RCRA Section 3004(d) prior to land disposal.

I, Christopher McBee CHRISTOPHER McBee
Authorized Generator Signature *Printed Generator Name*

hereby certify that all information for the Approval(s) listed above is accurate and complete.

Company Name: DOUBLE EAGLE STEEL COATING CO Date: 12/7/05

YOUR BUSINESS. OUR SOLUTIONS. A PRODUCTIVE PARTNERSHIP®

Mail or fax to: EQ Detroit, Inc., 1923 Frederick, Detroit, MI 48211. Phone: 1-800-405-6059 Fax: 1-313-923-3375

Attn: Chris 313-203-9705

2 pages

THE ENVIRONMENTAL QUALITY COMPANY®

Generator Waste Amendment

EQ Detroit, Inc. (MID980991566)
1923 Frederick
Detroit, MI 48211
December 7, 2005

Approval: KF05946

Generator: DOUBLE EAGLE (MID981092190)
3000 MILLER ROAD
DEARBORN, MI 48120

Customer: EQ INDUSTRIAL SERVICES, INC. (004077)

Common Name: BASEMENT CLEANUP-PERLITE W/FILTERCAKE

Waste Codes: 029L

In the event that a waste stream composition changes before the annual update is required, the generator may use this form to amend the waste profile. (A new sample may be required.) Please note, if the process generating the waste has changed, a new Waste Characterization Report, sample and analytical must be submitted for a new waste stream approval.

Please provide a detailed description below of the change(s) to the waste stream.

Amendment: Due to accidental mixing of Hydrochloric acid (<30% concentration) to the approval KF05946, please correct the approval number to LF051448. The DOT description should be corrected to read: "Waste Corrosive Liquids, Acidic, Inorganic, N.O.S., (Hydrochloric Acid), 8, UN3264, PGII" on manifest MI9509332 Add D002 to Box I and see attached LDR form.
Thank you

Christopher McBee CHRISTOPHER McBee

Authorized Generator Signature *Printed Generator Name*

hereby certify that all information for the Approval listed above is accurate and complete.

Company Name: DOUBLE EAGLE STEEL COATING CO. Date: 12/7/05

fax back to 313-923-8295
Attn: Cori Sutton

YOUR BUSINESS. OUR SOLUTIONS. A PRODUCTIVE PARTNERSHIP®

Mail or fax to: EQ Detroit, Inc., 1923 Frederick, Detroit, MI 48211, Phone: 1-800-495-6059 Fax: 1-313-923-3375

THE ENVIRONMENTAL QUALITY COMPANY ®

Generator Approval Notification

April 4, 2006

Customer: EQ INDUSTRIAL SERVICES, INC.
Fax: (734) 547-2502

BOB ZARB
DOUBLE EAGLE
ATTN: CHRIS MCBEE
3000 MILLER ROAD
DEARBORN, MI 48120

This Generator Approval Notification acknowledges the acceptability of waste material(s) into the EQ environmental protection facility identified below and ensures that this facility has the appropriate permit(s) issued by federal and state regulatory agencies to properly transport, treat, and/or dispose of the waste material(s).

EQ FACILITY: EQ Detroit, Inc. (MID980991566)
1923 Frederick, Detroit, MI 48211

Approval Number: LF051991

Generator EPA ID: MID981092190 **Expires On:** 12/21/2006
Waste Common Name: Door 13 Filter Press Sludge
Comments:

Primary Waste Code: 029L

The Approval(s) listed above are based upon characterization information supplied to EQ by the Customer and the generator (if other than the Customer). The Customer is ultimately responsible for the accuracy and completeness of all such information, whether provided by the Customer or the generator. The Customer must notify the EQ Resource Team immediately upon knowledge of any changes to this information. This Approval and all wastes which are transported, delivered, or tendered to EQ under this Approval shall be subject to the attached Standard Terms and Conditions.

The Approval(s) will expire on the date(s) noted. Any new Approvals obtained from EQ on future business will be valid for a period of one (1) year from the date of issuance. Within 60 days of the Approval Expiration Date, you will be notified of the requirements for recertification.

No Sample

WASTE CHARACTERIZATION REPORT

T#: **114340**

LF051991

☐ ***I authorize EQ – The Environmental Quality Company to choose the appropriate method of waste management, from the technologies offered, at the EQ facilities identified below.***

☐ **Michigan Disposal Waste Treatment Plant** (Stabilization and Treatment)	49350 N. I-94 Service Drive, Belleville, MI 48111 Phone: 800-592-5489 Fax: 800-592-5329	EPA ID # MID 000 724 831
☐ **Wayne Disposal, Inc. Site #2 Landfill** (Hazardous & Chemical Waste Landfill)	49350 N. I-94 Service Drive, Belleville, MI 48111 Phone: 800-592-5489 Fax: 800-592-5329	EPA ID # MID 048 090 633
☐ **EQ Detroit, Inc.** (Stabilization, Wastewater Treatment)	1923 Frederick Street, Detroit, MI 48211 Phone: 800-495-6059 Fax: 313-923-3375	EPA ID # MID 980 991 566
☐ **EQ Resource Recovery, Inc.** (Solvent Recycling, Fuel Blending, WW Treatment)	36345 Van Born Road, Romulus, MI 48174 Phone: 866-373-8357 Fax: 734-326-4033	EPA ID # MID 060 975 844
☐ **EQ North Carolina** (Stabilization, Treatment, Labpack Decommissioning)	1005 Investment Blvd, Apex, NC 27502 Phone: 919-363-4700 Fax: 919-363-4714	EPA ID # NCD 982 170 292
☐ **EQ Florida, Inc.** (Drum Consolidation, Labpack Decommissioning)	7202 East 8th Ave, Tampa, FL 33619 Phone: 800-624-5302 Fax: 813-628-0842	EPA ID # FLD 981 932 494
☐ **EQ Transfer & Processing** (Drum Transfer/Non-Hazardous Waste Processing)	1010 Old Rawsonville Rd., Ypsilanti, MI 48198 Phone: 734-547-1000 Fax: 734-480-9195	EPA ID #MIO 000 263 871 EPA ID #MIR 000 033 969
☐ **EQ Indianapolis** (Drum Transfer/Non-Hazardous Waste Processing)	4000 West 10th Street, Indianapolis, IN 46222 Phone: 317-247-7160 Fax: 317-247-7170	EPA ID #MIO 000 263 871
☐ **EQ Atlanta** (Drum Transfer/Non-Hazardous Waste Processing)	5600 Fulton Industrial Blvd SW, Atlanta, GA 30336 Phone: 404-494-3520 Fax: 404-494-3560	EPA ID #MIO 000 263 871
☐ **EQ Augusta, Inc.** (Wastewater Treatment)	3920 Goshen Industrial Blvd, Augusta, GA 30906 Phone: 706-771-9100 Fax: 706-771-9124	EPA ID # GAR 000 011 817

Waste Common Name: DOOR 13 FILTER PRESS SLUDGE

Section 1 – Generator & Customer Information

SIC/NAICS* _____

Generator EPA ID # MID 981 092 190

Generator Double EAGLE STEEL

Facility Address 3000 MILLER RD.

City Dearborn State MI Zip 48120

County WAYNE

Mailing Address _____

City _____ State _____ Zip _____

Generator Contact CHRIS MCBEE

Title ENVIRONMENTAL ENGINEER

Phone 313-203-9829 Fax 313-203-9705

*For a list of NAICS codes, please refer to Section 9 of the EQ Resource Guide.

Internal Use Only: EQ Division _____

EQ Customer No. _____

CONTING

Invoicing Company EQIS

Address _____

City _____ State _____ Zip _____

Country _____

Invoicing Contact JOHN LEONARD

Phone _____ Fax _____

Technical Contact _____

Phone _____ Fax _____

Mobile _____ Pager _____

E-mail → MCBEE @ DESCC.COM

Section 2 – Shipping & Packaging Information

2.1) Shipping Volume & Frequency 2X

~~☒ One Time Only~~ ☒ Year ☐ Quarter ☐ Month

2.2) DOT Shipping Name OTHER WASTE 029L CM

~~NON-HAZARDOUS WASTE LIQUID~~ CM

~~NON-HAZARDOUS LIQUID INDUSTRIAL WASTE~~ CM

2.3) Is this waste surcharge exempt? ☐ Yes ☒ No

If yes, please attach a surcharge exemption form, found in Section 2 of the EQ Resource Guide.

2.4) Packaging (check all that apply)

☐ Bulk Solid (Yd³ < 2000 lbs/yd³)

☐ Bulk Solid (Ton > 2000 lbs/yd³)

☐ Bulk Liquids (Gallon)

☐ Totes, Size _____

☒ Cubic Yard Boxes/Bags – LIQUID IN VAC BOX

☐ Drums

☐ Other (palletized, 5 gal. Pail, etc.) _____

Quoted bulk disposal charges for solid materials will be billed by the cubic yard, if the waste density is less than 2,000lbs./cubic yard. If waste density is greater than 2,000 lbs./cubic yard, then bulk disposal charges will be billed by the ton, regardless of the approved container.

© EQ-The Environmental Quality Company

Section 3 – Physical Characteristics

3.1) Color Beige 3.2) Odor none

3.3) Does this waste contain any "Potentially Odorous Constituents" as defined in the EQ Resource Guide? (Section 3) ☐ Yes ☒ No

3.4) Physical State at 70°F: ☐ Solid ☐ Dust/Powder ☒ Liquid ☒ Sludge

3.5) What is the pH of this waste? ☐ ≤1 ☐ 2.1-4.9 ☒ 5-10 ☐ 10.1-12.4 ☐ ≥12.5

3.6) What is the flash point of this waste? ☐ <90°F ☐ 90-140°F ☐ 140-199°F ☒ ≥200°F

3.7) Does this waste contain? (check all that apply) ☐ CN ☒ Free Liquids ☐ Oily Residue ☐ Metal Fines
☐ Biodegradable Solvents ☐ Amines ☐ Ammonia ☐ Dioxins ☐ Furans ☐ Biohazard
☐ Shock Sensitive Waste ☐ Reactive Waste ☐ Radioactive Waste ☐ Explosives ☐ Pyrophoric Waste ☐ Isocyanates
☐ Asbestos – non-friable ☐ Asbestos – friable

Section 4 – Waste Composition and Generating Process

4.1) Describe the physical composition of the waste (i.e., soil, water, PPE, debris, key chemical compounds, etc.)

Filter Cake Solids 50 to 100 % _____ to ____ %
Water 50 to 100 % _____ to ____ %
Total: 100%

4.2) Provide a *detailed* description of the process generating this waste (attach flow diagram if available).

Waste Water Treatment Solids from Zinc Precipitation. Filter Cake is ~~may be~~ watery and cannot be shipped as solid. Filter cake is to be vacuumed from Roll off into a closed 30 yd vacuum box.

Section 5 – Hazardous or Non-Hazardous Waste?

Please refer to Section 3 of the EQ Resource Guide for a list of waste codes

As determined by 40 CFR, Part 261 and State Rules: Please list applicable waste code(s):

5.1) Is this an EPA RCRA listed hazardous waste (F, K, P or U)? ☐ Yes ☒ No

5.2) Is this an EPA RCRA characteristic hazardous waste (D001-D043)? ☐ Yes ☒ No

5.3) Do any State Waste Codes apply? ☒ Yes ☐ CN 029L

5.4) Is this waste intended for wastewater treatment? ☐ Yes* ☒ No

*If you answered 'no' to 5.1, 5.2, and 5.3, please skip to Section 7. *If you answered 'yes' to 5.4, please attach the Waste Characterization Report Addendum found in Section 7 of the EQ Resource Guide.*

Section 6 – Hazardous Wastes

6.1) Does this waste exceed Land Disposal Restriction levels? ☐ Yes ☒ No

6.1a) If this waste stream is greater than 50% soil, does it meet the alternative soil treatment standards of 40 CFR 268.49? ☐ Yes ☒ No

6.1b) Does this waste contain greater than 50% debris, by volume? (Debris is greater than 2.5 inches in size.) ☐ Yes ☒ No

6.2) Is the waste an oxidizer (D001)? ☐ Yes ☒ No

6.3) Does this waste contain reactive cyanide ≥250 ppm (D003)? ☐ Yes ☒ No

6.4) Does this waste contain reactive sulfide ≥ 500 ppm (D003)? ☐ Yes ☒ No

6.5) Please indicate which constituent concentrations are below or above the regulatory level. Please indicate the basis used in the determination. Either "Below" or "Above" MUST be checked for each constituent.

Based On: ☒ Generator Knowledge ☒ Analysis* ☐ MSDS* *Please attach a copy.

Code		Regulatory Level TCLP (mg/l)	Concentration (if above)	Code		Regulatory Level TCLP (mg/l)	Concentration (if above)
D004	Arsenic	5	☒ Below ☐ Above ____	D024	m-Cresol	200	☒ Below ☐ Above ____
D005	Barium	100	☒ Below ☐ Above ____	D025	p-Cresol	200	☒ Below ☐ Above ____
D006	Cadmium	1	☒ Below ☐ Above ____	D026	Cresols	200	☒ Below ☐ Above ____
D007	Chromium	5	☒ Below ☐ Above ____	D027	1,4-Dichlorobenzene	7.5	☒ Below ☐ Above ____
D008	Lead	5	☒ Below ☐ Above ____	D028	1,2-Dichloroethane	0.5	☒ Below ☐ Above ____
D009	Mercury	0.2	☒ Below ☐ Above ____	D029	1,1-Dichloroethylene	0.7	☒ Below ☐ Above ____
D010	Selenium	1	☒ Below ☐ Above ____	D030	2,4-Dinitrotoluene	0.13	☒ Below ☐ Above ____
D011	Silver	5	☒ Below ☐ Above ____	D031	Heptachlor	0.008	☒ Below ☐ Above ____
D012	Endrin	0.02	☒ Below ☐ Above ____	D032	Hexachlorobenzene	0.13	☒ Below ☐ Above ____
D013	Lindane	0.4	☒ Below ☐ Above ____	D033	Hexachlorobutadiene	0.5	☒ Below ☐ Above ____
D014	Methoxychlor	10	☒ Below ☐ Above ____	D034	Hexachloroethane	3.0	☒ Below ☐ Above ____
D015	Toxaphene	0.5	☒ Below ☐ Above ____	D035	Methyl Ethyl Ketone	200	☒ Below ☐ Above ____
D016	2,4-D	10	☒ Below ☐ Above ____	D036	Nitrobenzene	2	☒ Below ☐ Above ____
D017	2,4,5-TP (Silvex)	1	☒ Below ☐ Above ____	D037	Pentachlorophenol	100	☒ Below ☐ Above ____
D018	Benzene	0.5	☒ Below ☐ Above ____	D038	Pyridine	5	☒ Below ☐ Above ____
D019	Carbon Tetrachloride	0.5	☒ Below ☐ Above ____	D039	Tetrachloroethylene	0.7	☒ Below ☐ Above ____
D020	Chlordane	0.03	☒ Below ☐ Above ____	D040	Trichloroethylene	0.5	☒ Below ☐ Above ____
D021	Chlorobenzene	100	☒ Below ☐ Above ____	D041	2,4,5-Trichlorophenol	400	☒ Below ☐ Above ____
D022	Chloroform	6.0	☒ Below ☐ Above ____	D042	2,4,6-Trichlorophenol	2	☒ Below ☐ Above ____
D023	o-Cresol	200	☒ Below ☐ Above ____	D043	Vinyl Chloride	0.2	☒ Below ☐ Above ____

6.6) If this is a characteristic hazardous waste, does it contain underlying hazardous constituents? ☐ Yes ☒ No
If yes, please list the constituents in Section 11.

Section 7 – Non-Hazardous Wastes

For a complete list of non-hazardous waste codes, please refer to Section 7 of the EQ Resource Guide

Please list applicable waste code:

7.1) Is this a Michigan non-hazardous liquid industrial waste? ☒ Yes ☐ No
7.2) Is this a Universal waste? ☐ Yes ☒ No
7.3) Is this a Recyclable Commodity? (e.g.: computer monitors, free mercury, etc.) ☐ Yes ☒ No
7.4) Is this waste a recoverable petroleum product? ☐ Yes* ☒ No
7.5) Is this waste used oil as defined by 40 CFR Part 279? ☐ Yes* ☒ No

If you answered 'yes' to questions 7.4 or 7.5 please attach the Waste Characterization Report Addendum found in Section 7 of the EQ Resource Guide.

Section 8 – TSCA Information

8.1) What is the concentration of PCBs in the waste? ☒ None ☐ 0-5 ppm ☐ 6-49 ppm ☐ 50-499 ppm ☐ 500+ ppm
8.2) Does the waste contain PCB contamination from a source with a concentration ≥ 50 ppm? ☐ Yes ☒ No
If you answered "no" to 8.1 and 8.2, please skip to Section 9.
8.3) Has this waste been processed into a non-liquid form? ☐ Yes ☐ No
If yes, what was the concentration of PCBs prior to processing? ☐ N/A ☐ 0-499 ppm ☐ 500+ ppm
8.4) Is this non-liquid PCB waste in the form of soil, rags, debris, or other contaminated media? ☐ Yes ☐ No
8.5) Are you a PCB capacitor manufacturer or a PCB equipment manufacturer? ☐ Yes ☐ No
8.6) Has the PCB Article (e.g., transformer, hydraulic machine, PCB-contaminated electrical equipment) been drained/flushed of all PCBs and decontaminated in accordance with 40 CFR 761.60(b)? ☐ N/A ☐ Yes ☐ No

Section 9 – Clean Air Act Information

NESHAP SIC*		
2812	2836	2875
2813	2841	2879
2816	2842	2891
2819	2843	2892
2821	2844	2893
2822	2851	2895
2823	2861	2899
2824	2865	2911
2833	2869	3312
2834	2873	4953
2835	2874	9511

9.1) Is this waste subject to regulation under 40 CFR, Part 63, Subpart DD or 40 CFR, Part 264, Subpart CC (RCRA)? ☐ Yes ☒ No
(Does the waste contain >500 ppm Volatile Organic Hazardous Air Pollutants – VOHAP's or Volatile Organic Compounds – VOC's?)
For a complete list of VOHAP's, please see Section 11 of the EQ Resource Guide
9.2) Does this waste stream contain Benzene? ☐ Yes ☒ No
If you answered "no" to 9.2, please skip to Section 10.
9.3) Does the waste stream come from a facility with one of the SIC codes listed under the NESHAP? ☐ Yes ☐ No
9.4) Is the generating source of this waste stream a facility with Total Annual Benzene (TAB) ≥10 Mg/year? ☐ Yes ☐ No
For assistance in calculating the TAB, please see the TAB Worksheet in Section 9 of the EQ Resource Guide.
If you answered "no" to question 9.3 and 9.4, please skip to Section 10.
9.5) Does the waste contain >10% water? ☐ Yes ☐ No
9.6) What is the TAB quantity for your facility? _____ Mg/Year
9.7) Does the waste contain >1.0 mg/kg total Benzene? ☐ Yes ☐ No
9.8) What is the total Benzene concentration in your waste? _____ Percent or _____ ppmw.
(Do not use TCLP analytical results. Acceptable laboratory methods include 8020, 8240, 8260, 602 and 624.)
*For a list of NAICS codes, please refer to Section 9 of the EQ Resource Guide.

Section 10 – Fuel Blending Information

10.1) Is this waste intended for fuel blending? ☐ Yes* ☒ No
*If yes, Heat value (BTU/lb.) _____ Chlorine (%) _____ Water (%) _____ Solids (%) _____
10.2) Is this waste intended for reclamation? ☐ Yes ☒ No (5-Gallon Sample required for all reclaim waste streams)

Section 11 – Constituent Information

Please identify your waste constituents from these four categories: *Underlying Hazardous Constituents (UHC's), Volatile Organic Hazardous Air Pollutants (VOHAP's), Volatile Organic Compounds (VOC's) and Toxic Release Inventory Constituents (TRI)*

Constituent	Concentration	UHC?		Constituent	Concentration	UHC?	
		☐ Yes	☐ No			☐ Yes	☐ No
		☐ Yes	☐ No			☐ Yes	☐ No
		☐ Yes	☐ No			☐ Yes	☐ No
		☐ Yes	☐ No			☐ Yes	☐ No
		☐ Yes	☐ No			☐ Yes	☐ No

Please see Section 11 of the EQ Resource Guide for a list of UHC's, VOHAP's and VOC's. For a complete list of TRI constituents, please refer to 40 CFR 372.65.

Section 12 – Certification

I certify that all information (including attachments) is complete and factual and is an accurate representation of the known and suspected hazards, pertaining to the waste described herein. I authorize EQ's Resource Team to add supplemental information to the waste approval file, provided I am contacted and give verbal permission. I authorize EQ's Resource Team to obtain a sample from any waste shipment for purposes of verification and confirmation. I agree that, if EQ approves the waste described herein, all such wastes that are transported, delivered, or tendered to EQ by Generator or on Generator's behalf shall be subject to, and Generator shall be bound by, the attached Standard Terms and Conditions.

Generator Signature Christopher McBee Printed Name CHRISTOPHER McBee
Company DOUBLE EAGLE STEEL Title ENV. ENGINEER Date 12/19/05

The generator's signature MUST appear on the EQ Waste Characterization Report. If the generator has authorized a third party to certify this document, a written notice (on generator letterhead) must accompany this submittal. Although the EQ Resource Team is authorized to make certain modifications to the information provided on this form, the addition or removal of waste codes and waste constituents must be documented by the generator.

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DOOR 13 FILTER CAKE - TOTAL ZINC

22345 Roethel Drive
Novi, MI 48375
248.344.1770
Fax 248.344.2654

Clayton GROUP SERVICES

September 14, 2005

Christopher McBee
DOUBLE EAGLE STEEL COATING COMPANY
3000 Miller Road
Dearborn, MI 48120-

Clayton Work Order No. 05090407

Reference:

Dear Christopher McBee:

Clayton Group Services received 1 sample on 9/12/2005 for the analyses presented in the following report.

Enclosed is a copy of the Chain-of-Custody record, acknowledging receipt of these samples. Please note that any unused portion of the samples will be discarded 30 days after the date of this report, unless you have requested otherwise.

This material is confidential and is intended solely for the person to whom it is addressed. If this is received in error, please contact the number provided below.

We appreciate the opportunity to assist you. If you have any questions concerning this report, please contact a Client Services Representative at (800) 806-5887.

Sincerely,

Karen Coonan

Karen Coonan
Client Services Representative

cc:

Clayton

CASE NARRATIVE

Date: *14-Sep-05*

CLIENT: DOUBLE EAGLE STEEL COATING COMPANY

Project:

Work Order No 05090407

All quality control results associated with this sample set were within acceptable limits and/or do not adversely affect the reported results, unless otherwise noted below.

This is additional work that was requested September 9, 2005. The original Work Order number is #05080592.

ANALYTICAL RESULTS

Date: *14-Sep-05*

Clayton

CLIENT:	DOUBLE EAGLE STEEL COATING COMPANY	**Client Sample ID:**	DOOR 13 FILTER CAKE
Work Order No:	05090407	**Tag Number:**	
Project:		**Collection Date:**	8/10/2005
Lab ID:	05090407-001A	**Matrix:**	SOLID

Analyses	Result	Reporting Limit	Qual	Units	DF	Date Analyzed	Analyst
METHOD EPA 6010B							
Zinc	410,000,000	3,000		µg/Kg	1	9/13/2005	DH

Qualifiers:	ND - Not Detected at the Reporting Limit (RL).	S - Spike Recovery outside accepted recovery limits
	J - Analyte detected below the Reporting Limit	R - RPD outside accepted recovery limits
	B - Analyte detected in the associated Method Blank	E - Value above quantitation range
	* - Value exceeds Maximum Contaminant Level	T - Tentatively Identified Compound (TIC)

Clayton GROUP SERVICES

REQUEST FOR LABORATORY ANALYTICAL SERVICES

IMPORTANT
Date Results Requested: _____
Rush Charges Authorized? ☐ Yes ☐ No
☐ Fax or ☐ E-mail Results
E-mail address: _____

F. ___ of ___
For Clayton Use Only
Clayton Lab Project No.
05080592

REPORT RESULTS TO
Name: CHRISTOPHER McBee
Company: Double Eagle
Mailing Address: 3000 Miller
City, State, Zip: Dearborn, MI 48120
Telephone No.:
FAX No.:
Client Job No.:
Dept.:

SEND INVOICE TO
Purchase Order No.:
Name:
Company:
Dept.:
Address:
City, State, Zip:

Special instructions and/or specific regulatory requirements: (method, limit of detection, etc.)

* Explanation of Preservative

Samples are: (check if applicable)
☐ Drinking Water
☐ Groundwater
☐ Wastewater

ANALYSIS REQUESTED
(Enter an 'X' in the box below to indicate request. Enter a 'P' if Preservative added.)

CLIENT SAMPLE IDENTIFICATION	DATE SAMPLED	TIME SAMPLED	MATRIX/ MEDIA	AIR VOLUME (specify units)	Number of Containers	TCLP Pb, Cr	TCLP Hg (8)	Total Zinc	Additional Metals							FOR LAB USE ONLY
Door 13 Filter Cake	8/10	5:00pm				X		X								
Tank Farm Liner	8/9	3:00pm					X									

CHAIN OF CUSTODY
Collected by: C. McBee (print) — Collector's Signature:
Relinquished by: C. McBee — Date/Time
Relinquished by: — Date/Time
Method of Shipment:
Received by: — Date/Time 8/12/05
Received by: — Date/Time
Received at Lab by: Dan E — Date/Time 8/12
Sample Condition Upon Receipt: ☒ Acceptable ☐ Other (explain)
Authorized by: C. McBee (Client Signature MUST Accompany Request) — Date 8/11/05

2.3
4.8
2.41

Please return completed form and samples to one of the Clayton Group Services, Inc. labs listed below:

Detroit Regional Lab
22345 Roethel Drive
Novi, MI 48375
(800) 808-5887
(248) 344-1770
FAX (248) 344-2655

Atlanta Regional Lab
3380 Chastain Meadows Parkway, Suite 300
Kennesaw, GA 30144
(800) 252-9919
(770) 499-7600
FAX (770) 423-4990

Seattle Regional Lab
4636 E. Marginal Way S., Suite 215
Seattle, WA 98134
(800) 568-7755
(206) 763-7364
FAX (206) 763-4189

DISTRIBUTION:
White = Clayton Laboratory
Yellow = Clayton Accounting
Pink = Client Copy

9/97 20K

DE05036-B CD 47 + CS Total Alkalinity
DEOR 13 TCLP Pb

BUREAU VERITAS

December 09, 2005

Christopher McBee
DOUBLE EAGLE STEEL COATING COMPANY
3000 Miller Road
Dearborn, MI 48120-

Clayton Work Order No. 05120042

Reference:

Dear Christopher McBee:

DE05036-B

Clayton Group Services received 3 samples on 12/1/2005 for the analyses presented in the following report.

Enclosed is a copy of the Chain-of-Custody record, acknowledging receipt of these samples. Please note that any unused portion of the samples will be discarded 30 days after the date of this report, unless you have requested otherwise.

This material is confidential and is intended solely for the person to whom it is addressed. If this is received in error, please contact the number provided below.

We appreciate the opportunity to assist you. If you have any questions concerning this report, please contact a Client Services Representative at (800) 806-5887.

Sincerely,

Karen Coonan

Karen Coonan
Client Services Representative

cc:

Clayton Group Services, Inc.
A Bureau Veritas Company
22345 Roethel Drive
Novi, MI 48375

Main: (248) 344-1770
Fax: (248) 344-2655
www.us.bureauveritas.com

BUREAU VERITAS

CASE NARRATIVE

Date: *09-Dec-05*

Client: DOUBLE EAGLE STEEL COATING COMPANY

Project:

Work Order No 05120042

All quality control results associated with this sample set were within acceptable limits and/or do not adversely affect the reported results, unless otherwise noted below.

Samples were received at the laboratory at an average temperature of 2.3 °C.

BUREAU VERITAS

ANALYTICAL RESULTS

Date: *09-Dec-05*

Client: DOUBLE EAGLE STEEL COATING COMPANY

Work Order No: 05120042

Project:

Lab ID: 05120042-003B

Client Sample ID: DOOR 13 FILTER CAKE

Matrix: LEACHATE

Tag Number:

Collection Date: 12/1/2005

Analyses	Result	Reporting Limit	Qual	Units	DF	Date Analyzed	Analyst
ICP METALS;LEACHATE: METHOD EPA 1311/6010B							
Arsenic	ND	0.10		mg/L	1	12/7/2005	CAW
Barium	0.16 T	0.10		mg/L	1	12/7/2005	CAW
Cadmium	ND	0.050		mg/L	1	12/7/2005	CAW
Chromium	ND	0.10		mg/L	1	12/7/2005	CAW
Lead	ND	0.10		mg/L	1	12/7/2005	CAW
Selenium	ND	0.20		mg/L	1	12/7/2005	CAW
Silver	ND	0.020		mg/L	1	12/7/2005	CAW
TCLP MERCURY; METHOD EPA 1311/7470A							
Mercury	ND	0.0010		mg/L	1	12/8/2005	RS

Qualifiers:

ND - Not Detected at the Reporting Limit (RL).
J - Analyte detected below the Reporting Limit
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
E - Value above quantitation range
T - Tentatively Identified Compound (TIC)

Clayton Group Services

Date: *09-Dec-05*

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 05120042
Project:

QC SUMMARY REPORT
Method Blank

Sample ID: MB-21939 | Batch ID: 21939 | Units: mg/L | Analysis Date 12/7/2005 | Prep Date: 12/7/2005
Client ID: | Run ID: ME_PE3C_051207C | SeqNo: 886410

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	ND	0.1									
Barium	ND	0.1									
Cadmium	ND	0.05									
Chromium	ND	0.1									
Lead	ND	0.1									
Selenium	ND	0.2									
Silver	ND	0.02									

Sample ID: MB-21944 | Batch ID: 21944 | Units: mg/L | Analysis Date 12/8/2005 | Prep Date: 12/7/2005
Client ID: | Run ID: ME_VA2B_051208A | SeqNo: 886836

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Mercury	ND	0.001									

Sample ID: MB-R75495 | Batch ID: R75495 | Units: mg/L CaCO3 | Analysis Date 12/2/2005 | Prep Date:
Client ID: | Run ID: WC_MA7G_051202A | SeqNo: 883297

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Alkalinity, Carbonate (As CaCO3)	ND	2									
Alkalinity, Hydroxide (As CaCO3)	ND	2									
Alkalinity, Total (As CaCO3)	ND	2									

Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

Clayton Group Services

Date: *09-Dec-05*

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 05120042
Project:

QC SUMMARY REPORT
Laboratory Control Spike

Sample ID: LCS-21939 | Batch ID: 21939 | Units: mg/L | Analysis Date 12/7/2005 | Prep Date: 12/7/2005
Client ID: | Run ID: ME_PE3C_051207C | SeqNo: 886411

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	4.9	0.1	5	0	98	85	113	0			
Barium	5	0.1	5	0	100	85.2	113	0			
Cadmium	5.04	0.05	5	0	101	85.8	113	0			
Chromium	4.96	0.1	5	0	99.2	84.2	113	0			
Lead	4.86	0.1	5	0	97.2	86	112	0			
Selenium	4.8	0.2	5	0	96	83.4	115	0			
Silver	4.9	0.02	5	0	98	82.4	115	0			

Sample ID: LCS-21944 | Batch ID: 21944 | Units: mg/L | Analysis Date 12/8/2005 | Prep Date: 12/7/2005
Client ID: | Run ID: ME_VA2B_051208A | SeqNo: 886837

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Mercury	0.00214	0.001	0.002	0	107	75.6	124	0			

Sample ID: LCS-R75495 | Batch ID: R75495 | Units: mg/L CaCO3 | Analysis Date 12/2/2005 | Prep Date:
Client ID: | Run ID: WC_MA7G_051202A | SeqNo: 883298

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Alkalinity, Total (As CaCO3)	97.5	2	100	0	97.5	95.4	106	0			

Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 05120042
Project:

QC SUMMARY REPORT
Laboratory Control Spike Duplicate

Sample ID: LCSD-R75485 Batch ID: R75485 Units: mg/L CaCO3 Analysis Date 12/2/2005 Prep Date:
Client ID: Run ID: WC_MA7G_051202A SeqNo: 883301

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Alkalinity, Total (As CaCO3)	98	2	100	0	98	95.4	106	97.5	0.512	4.31	

Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

Clayton Group Services

Date: *09-Dec-05*

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 05120042
Project:

QC SUMMARY REPORT
Sample Matrix Spike

Sample ID: 05120034-001B MS | Batch ID: 21939 | Units: mg/L | Analysis Date 12/7/2005 | Prep Date: 12/7/2005
Client ID: | Run ID: ME_PE3C_051207C | SeqNo: 886413

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	5.16	0.1	5	0	103	82.5	120	0			
Barium	5.25	0.1	5	0.44	96.2	81.1	116	0			
Cadmium	4.96	0.05	5	0	99.2	81.6	115	0			
Chromium	6.91	0.1	5	2.105	96.1	80.9	112	0			
Lead	4.72	0.1	5	0	94.4	80.5	113	0			
Selenium	5.12	0.2	5	0	102	81.3	120	0			
Silver	5.08	0.02	5	0	102	70.1	123	0			

Sample ID: 05120034-001B MSD | Batch ID: 21939 | Units: mg/L | Analysis Date 12/7/2005 | Prep Date: 12/7/2005
Client ID: | Run ID: ME_PE3C_051207C | SeqNo: 886414

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	5.22	0.1	5	0	104	82.5	120	5.16	1.16	11.3	
Barium	5.25	0.1	5	0.44	96.2	81.1	116	5.25	0	7.55	
Cadmium	4.95	0.05	5	0	99	81.6	115	4.96	0.202	7.28	
Chromium	6.92	0.1	5	2.105	96.3	80.9	112	6.91	0.145	7.12	
Lead	4.71	0.1	5	0	94.2	80.5	113	4.72	0.212	7.21	
Selenium	5.28	0.2	5	0	106	81.3	120	5.12	3.08	21.4	
Silver	5.03	0.02	5	0	101	70.1	123	5.08	0.989	49.7	

Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 05120042
Project:

QC SUMMARY REPORT

Sample Matrix Spike

Sample ID: 05120042-003B MS | Batch ID: 21944 | Units: mg/L | Analysis Date 12/8/2005 | Prep Date: 12/7/2005
Client ID: DOOR 13 FILTER CAKE | Run ID: ME_VA2B_051208A | SeqNo: 886841

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Mercury	0.00208	0.001	0.002	0	104	63.8	137	0			

Sample ID: 05120042-003B MSD | Batch ID: 21944 | Units: mg/L | Analysis Date 12/8/2005 | Prep Date: 12/7/2005
Client ID: DOOR 13 FILTER CAKE | Run ID: ME_VA2B_051208A | SeqNo: 886842

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Mercury	0.00198	0.001	0.002	0	99	63.8	137	0.00208	4.93	24.1	

Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

EXPEDITE! #1 and 2

Clayton GROUP SERVICES

REQUEST FOR LABORATORY ANALYTICAL SERVICES

IMPORTANT
Date Results Requested: 12/5
Rush Charges Authorized? [X] Yes [ ] No
[ ] Fax or [ ] E-mail Results
E-mail address:

Page ___ of ___

For Clayton Use Only
Clayton Lab Project No. 05120042

REPORT RESULTS TO
Name: CHRISTOPHER MGEE
Company: DOUBLE EAGLE
Mailing Address: 3000 MILLER ROAD
City, State, Zip: DEARBORN, MI
Telephone No.: 313 203 9529
Client Job No.:
Dept.:
FAX No.:

SEND INVOICE TO
Purchase Order No.:
Name:
Company:
Dept.:
Address:
City, State, Zip:

Special instructions and/or specific regulatory requirements: (method, limit of detection, etc.)

* Explanation of Preservative

Soils: Which state are these from?

Waters: [ ] Drinking Water [ ] Groundwater [ ] Wastewater

ANALYSIS REQUESTED
(Enter an 'X' in the box below to indicate request. Enter a 'P' if Preservative added.)

CLIENT SAMPLE IDENTIFICATION	DATE SAMPLED	TIME SAMPLED	MATRIX/ MEDIA	AIR VOLUME (specify units)	Number of Containers	TOTAL ALKALINITY	TCLP M(8)	12/1	340	FOR LAB USE ONLY
1 CATCH BASIN 24	11/30		Water			X				
2 CATCH BASIN 25	11/30		Water			X				
3 DOOR 13 FILTER CAKE	12/1		SOLID				X			

CHAIN OF CUSTODY
Collected by: R. LANDIE (print)
Relinquished by: C. MGEE — Date/Time 12/1
Relinquished by: — Date/Time
Method of Shipment:
Authorized by: C. MGEE (Client Signature MUST Accompany Request) — Date 12/1/05

Collector's Signature:
Received by: Richard Hutar — Date/Time 12/1 1:30
Received by: — Date/Time
Received at Lab by: Dan — Date/Time 12/1
Sample Condition Upon Receipt: [X] Acceptable [ ] Other (explain) 340

1.8
2.4
2.7

Please return completed form and samples to one of the Clayton Group Services, Inc. labs listed below:

Detroit Regional Lab
22345 Roethel Drive
Novi, MI 48375
(800) 806-5697
(248) 344-1770
FAX (248) 344-2655

Atlanta Regional Lab
3380 Chastain Meadows Parkway, Suite 300
Kennesaw, GA 30144
(800) 252-9919
(770) 499-7500
FAX (770) 429-4990

Seattle Regional Lab
4526 E. Marginal Way S., Suite 140
Seattle, WA 98134
(800) 563-7755
(206) 763-7364
FAX (206) 763-4189

DISTRIBUTION:
White = Clayton Laboratory
Yellow = Clayton Accounting
Pink = Client Copy

1/05 20K

FAX

Double Eagle Steel Coating Company
3000 Miller Road
Dearborn, MI 48120

Date December 19, 2005

Number of pages including cover sheet 16

To: Tim O'Connor

Re: **Non Haz Liquid Industrial Waste**

Phone

Fax Phone **313-336-3031**

CC:

From:

Christopher McBee

Phone **313-363-1902, 313-203-9829**

Fax Phone **313-203-9705**

REMARKS:

☐ Urgent ☒ For your review ☐ Reply ASAP ☐ Please comment

Expedite Please.

Hello Tim,

This is the profile for waste from our waste water treatment plant filter press. The material is too wet and the hauler will not take it because it has too much liquid. The material will be removed from the 20 yd. Open top roll off box and vacuumed into a vacuum box. There will likely be a large quantity of water used to help move / vacuum the product. Therefore it should be free flowing liquid with high solids and likely chunks of material. This does contain a very high level of zinc.

Note:

1. pH was determined in our on site laboratory to be 8.79. We use an EPA approved method to determine pH.
2. I am supplying analytical results for total zinc and TCLP Metals
3. pages 2 and 3 are removed from Report 05120042 because they are not applicable.

Regards,

Chris McBee CM

Environmental Engineer

Double Eagle Steel Company.

THE ENVIRONMENTAL QUALITY COMPANY

FAX COVER PAGE

Date: 12-20-05

Recipient: Christine Easley
Company: EQ Detroit
Phone:
Fax #: 313-923-

From: Timothy O'Connor
Phone: Office: 734-547-2500
Fax #: Office: 734-547-2502 Homefax: 313-336-3031

Total Pages (including cover page): 18

Comments: Profile for Double Eagle Steel

36255 Michigan Avenue, Wayne, Michigan 48184

THE ENVIRONMENTAL QUALITY COMPANY

Customer Account: 004077
Fax: (734) 547-2502

Customer Approval/Quote Confirmation
EQ Detroit, Inc. (MID980991566)
1923 Frederick
Detroit, MI 48211
December 21, 2005

ENVIRONMENTAL MANAGER
EQ INDUSTRIAL SERVICES, INC.
2701 NORTH I-94 SERVICE DRIVE
YPSILANTI, MI 48198

This Approval/Quote Confirmation acknowledges the acceptability of the waste described and ensures that the EQ environmental protection facility identified above has the appropriate permit(s) issued by federal and state regulatory agencies to properly transport, treat and/or dispose of the waste material(s) listed below. The Approval(s) are based upon information supplied to EQ by your company. The generator identified is ultimately responsible for the accuracy and completeness of the characterization information provided and any other information that was provided during the technical approval process. The generator must notify the EQ Resource Team immediately upon knowledge of any changes to this information. The Approval(s) and Quote(s) listed below will expire on the date(s) noted. Any new Approvals obtained from EQ on future business will be valid for a period of one (1) year from the date of issuance. For further information, refer to EQ's Standard Terms and Conditions (attached). Please prepare any Purchase/Work Orders for EQ-The Environmental Quality Company. To coordinate delivery of your waste stream(s), please contact our Scheduling Department at 1-800-495-6059.

I, _____ hereby certify that I have reviewed the information contained in this confirmation
(Authorized Customer Signature)
and agree to its contents and terms and conditions as set forth.

Printed Name: John Leonard Date: 12/22/05 Purchase/Work Order: _____

Please note the following:

- *Quoted bulk disposal charges for solid materials will be billed by the cubic yard if waste density is less than 2,000 pounds per cubic yard. If the waste density is greater than 2,000 pounds per cubic yard then bulk disposal charges will be billed by the ton regardless of the approved container. EQ personnel will monitor all shipments.*
- *An insurance surcharge of 1.5% will apply to all transportation, disposal and services provided.*
- *The Michigan DEQ will assess a manifest fee for all hazardous waste manifests used in the State of Michigan.*

Approval: **LF051991** Approval Expires On: **12/21/2006**

Generator: **MID981092190 DOUBLE EAGLE**
Common Name: **Door 13 Filter Press Sludge**
Waste Codes: Primary - **029L** Secondary -

Type of Service	Price	Unit	Min. Qty.
Treatment and Disposal - Additional $0.002 Perpetual Care Surcharge per unit	**$0.33**	**GAL**	**N/A**

YOUR BUSINESS. OUR SOLUTIONS. A PRODUCTIVE PARTNERSHIP®

Mail or fax to: EQ Detroit, Inc., 1923 Frederick, Detroit, MI 48211, Phone: 1-800-495-6059 Fax: 1-313-923-3375

THE ENVIRONMENTAL QUALITY COMPANY ®

Generator Approval Notification

April 4, 2006

Customer: EQ INDUSTRIAL SERVICES, INC.
Fax: (734) 547-2502

BOB ZARB
DOUBLE EAGLE
ATTN: CHRIS MCBEE
3000 MILLER ROAD
DEARBORN, MI 48120

This Generator Approval Notification acknowledges the acceptability of waste material(s) into the EQ environmental protection facility identified below and ensures that this facility has the appropriate permit(s) issued by federal and state regulatory agencies to properly transport, treat, and/or dispose of the waste material(s).

EQ FACILITY: EQ Detroit, Inc. (MID980991566)
1923 Frederick, Detroit, MI 48211

Approval Number: LF043681

Generator EPA ID: MID981092190 **Expires On:** 2/20/2007
Waste Common Name: SLUDGE FROM ALLOY RECIRC. TANK AFTER CLEANING
Comments: PARALLEL APPROVAL FROM MDI-070202MBF
Primary Waste Code: D007

The Approval(s) listed above are based upon characterization information supplied to EQ by the Customer and the generator (if other than the Customer). The Customer is ultimately responsible for the accuracy and completeness of all such information, whether provided by the Customer or the generator. The Customer must notify the EQ Resource Team immediately upon knowledge of any changes to this information. This Approval and all wastes which are transported, delivered, or tendered to EQ under this Approval shall be subject to the attached Standard Terms and Conditions.

The Approval(s) will expire on the date(s) noted. Any new Approvals obtained from EQ on future business will be valid for a period of one (1) year from the date of issuance. Within 60 days of the Approval Expiration Date, you will be notified of the requirements for recertification.

LF043681

TO Georgia
From Mark Gorman (734) 699-3457

EQ Tracking #

WASTE CHARACTERIZATION REPORT

TO EXPEDITE YOUR WASTE APPROVAL, PLEASE COMPLETE THIS FORM ENTIRELY

Please Choose One EQ Management Facility

☒ Michigan Disposal Waste Treatment Plant (Stabilization and Treatment)	49350 N. I-94 Service Drive Phone: 800-592-5489	Belleville, MI 48111 Fax: 800-592-5329	EPA ID # MID 000 724 831
☒ Wayne Disposal, Inc. Site #2 Landfill (Hazardous & Chemical Waste Landfill)	49350 N. I-94 Service Drive Phone: 800-592-5489	Belleville, MI 48111 Fax: 800-592-5329	EPA ID # MID 048 090 633
☐ Michigan Recovery Systems, Inc. (Solvent Recycling, Fuel Blending, WW Treatment)	36345 Van Born Road Phone: 800-521-0998	Romulus, MI 48174 Fax: 734-326-9375	EPA ID # MID 060 975 844
☐ EQIS – Transfer & Processing (Drum Transfer/Non-Hazardous Liquid Processing)	1010 Old Rawsonville Road Phone: 734-547-1000	Ypsilanti, MI 48197 Fax: 734-480-9195	EPA ID # MIR 000 031 969

Section 1 - Generator & Customer Information

SIC# /

Generator EPA ID # MIDR810990190
Generator Double Eagle Steel Coating Co.
Facility Address 3000 Miller Road
City Wayne State MI Zip 48120
County Wayne
Mailing Address (if different)
City State Zip
Generator Contact Mark Gorman
Title Environmental Engineer
Phone 313-303-9829 Fax 313-563-9705

EQ Customer No.
Invoicing Company EQES
Address
City State Zip
Country
Invoicing Contact Al Gordan
Phone 734-677-8822 Fax 734-677-8844
Technical Contact John Leonard
Phone 734-677-8822 Fax 734-677-8844

Section 2 - Shipping and Packaging Information

2.1) Shipping volume: 20 to 40 yards
2.2) Shipping frequency: ☒ One Time Only ☐ Annual
2.2) DOT shipping name
RQ Hazardous Waste Liquid UN3082
Class 9, PG III (Chromium)

per John Leonard 8/18/04

2.3) Packaging: (check all that apply)
☐ Bulk Solid (Yd³ <2000 lbs/yd³)
☐ Bulk Solid (Ton >2000 lbs/yd³)
☐ Bulk Liquids (Gallons)
☒ Cubic Yard Boxes
☐ Drums
☐ Other (palletized 5 gal. pails, etc.)

Quoted bulk disposal charges for solid materials will be billed by the cubic yd., if waste density is less than 2,000 lbs. per cubic yd. If waste density is greater than 2,000 lbs per cubic yd., then bulk disposal charges will be billed by the ton regardless of the approved container.

Section 3 - Physical Characteristics

WASTE COMMON NAME: Sludge from Alloy Recirc. Tank after cleaning

3.1) Color (describe): Brown/Black
3.2) Odor (describe): Slight
3.3) Physical state at 70 °F: (check all that apply)
☐ Solid ☐ Dust ☒ Liquid ☒ Sludge
3.4) Does this waste contain? (check all that apply)
☒ Free Liquids ☐ Metal fines ☐ Powders ☐ Oily residue
☐ Biodegradable sorbants ☐ NONE
3.5) Does this waste contain?: (check all that apply) ☒ NONE
☐ Asbestos - friable ☐ Pyrophoric waste
☐ Asbestos - non-friable ☐ Reactive waste
☐ Dioxins ☐ Shock Sensitive waste
☐ Furans ☐ Radioactive waste
☐ Biohazard ☐ Explosives

3.6) Describe the composition of the waste (i.e. key chemical compounds, soil, water, ppe, debris, etc.):

Sludge	40 to 50 %
Free Water	20 to 25 %
Solids	20 to 25 %
	to %

Total = 100 %

3.7) Does this waste contain > 50% contaminated soil? ☐ Yes ☒ No
3.8) Does this waste contain >50% debris by volume? ☐ Yes ☒ No
(debris is greater than 2.5 inches in size)

Section 4 - Generating Process and Regulatory Information

© 2000 EQ - The Environmental Quality Company

4.1) Provide a *detailed* description of the process (es) generating this waste (attach flow diagram if available):
Cleaning of Alloy Recirculation Tank System using Caustic with Sun Clean. Sludge vacuumed in vac box along with cleaning solution and some plating solution

Based upon RCRA waste regulations (40 CFR 261) and Michigan Act 451 Rules: Waste Code(s)

4.2) Is this an EPA RCRA listed hazardous waste (F, K, P or U)?	☐ Yes	☒ No	
4.3) Is this a MICHIGAN hazardous waste (Other than RCRA)?	☒ Yes	☐ No	D007
4.4) Is this a MICHIGAN nonhazardous liquid industrial waste?	☐ Yes	☒ No	
4.5) Is this a UNIVERSAL waste?	☐ Yes	☒ No	
4.6) Does this waste exceed LDR treatment standards?	☒ Yes	☐ No	
4.7) Is this an EPA RCRA characteristic hazardous waste (D001-D043)?	☒ Yes	☐ No	D007

4.8) What is the flash point of this waste? ☐ <90°F ☐ 90-140°F ☐ 140-199°F ☒ >200°F
4.9) Is the waste an oxidizer? ☐ Yes ☒ No
4.10) What is the pH of this waste? ☐ <2 ☒ 2-4.9 ☒ 5-10 ☐ 10.1-12.4 ☐ ≥12.5
4.11) Does this waste contain reactive cyanide ≥ 250 ppm? ☐ Yes ☒ No
4.12) Does this waste contain reactive sulfide ≥ 500 ppm? ☐ Yes ☒ No
4.13) Is the waste surcharge exempt? (attach surcharge form) ☐ Yes ☒ No

Code		Regulatory Level TCLP (mg/L)	Concentration (If above)	Code		Regulatory Level TCLP (mg/L)	Concentration (If above)
D004	Arsenic	5	☒ Below ☐ Above ____	D024	m-Cresol	200	☒ Below ☐ Above ____
D005	Barium	100	☒ Below ☐ Above ____	D025	p-Cresol	200	☒ Below ☐ Above ____
D006	Cadmium	1	☒ Below ☐ Above ____	D026	Cresols	200	☒ Below ☐ Above ____
D007	Chromium	5	☐ Below ☒ Above 6.5	D027	1,4-Dichlorobenzene	7.5	☒ Below ☐ Above ____
D008	Lead	5	☒ Below ☐ Above ____	D028	1,2-Dichloroethane	0.5	☒ Below ☐ Above ____
D009	Mercury	0.2	☒ Below ☐ Above ____	D029	1,1-Dichloroethylene	0.7	☒ Below ☐ Above ____
D010	Selenium	1	☒ Below ☐ Above ____	D030	2,4-Dinitrotoluene	0.13	☒ Below ☐ Above ____
D011	Silver	5	☒ Below ☐ Above ____	D031	Heptachlor	0.008	☒ Below ☐ Above ____
D012	Endrin	0.02	☒ Below ☐ Above ____	D032	Hexachlorobenzene	0.13	☒ Below ☐ Above ____
D013	Lindane	0.4	☒ Below ☐ Above ____	D033	Hexachlorobutadiene	0.5	☒ Below ☐ Above ____
D014	Methoxychlor	10	☒ Below ☐ Above ____	D034	Hexachloroethane	3.0	☒ Below ☐ Above ____
D015	Toxaphene	0.5	☒ Below ☐ Above ____	D035	Methyl Ethyl Ketone	200	☒ Below ☐ Above ____
D016	2,4-D	10	☒ Below ☐ Above ____	D036	Nitrobenzene	2	☒ Below ☐ Above ____
D017	2,4,5-TP(Silvex)	1	☒ Below ☐ Above ____	D037	Pentachlorophenol	100	☒ Below ☐ Above ____
D018	Benzene	0.5	☒ Below ☐ Above ____	D038	Pyridine	5	☒ Below ☐ Above ____
D019	CarbonTetrachloride	0.5	☒ Below ☐ Above ____	D039	Tetrachloroethylene	0.7	☒ Below ☐ Above ____
D020	Chlordane	0.03	☒ Below ☐ Above ____	D040	Trichloroethylene	0.5	☒ Below ☐ Above ____
D021	Chlorobenzene	100	☒ Below ☐ Above ____	D041	2,4,5-Trichlorophenol	400	☒ Below ☐ Above ____
D022	Chloroform	6.0	☒ Below ☐ Above ____	D042	2,4,6-Trichlorophenol	2	☒ Below ☐ Above ____
D023	o-Cresol	200	☒ Below ☐ Above ____	D043	Vinyl Chloride	0.2	☒ Below ☐ Above ____

4.14) The hazardous constituent information is based on: ☐ Analysis (Please attach for review) ☐ Generator Knowledge ☒ Both
4.15) If this is a characteristic (D-coded) hazardous waste, does it contain underlying hazardous constituents (List in Section5)? ☐ Yes ☒ No ☐ N/A

Section 5 - Constituent Information

Review the following items in the EQ Resource Guide and indicate their concentrations below:
1) MVOC (Michigan Volatile Organic Compounds) 2) CCVOC (Subpart CC Volatile Organic Compounds)
3) UHC (Underlying Hazardous Constituents) 4) TRI (Toxic Release Inventory Constituents)

Indicate all constituents in your waste stream, their concentrations, and circle Yes or No for UHC:

UHC?		UHC?	
Yes-No		Yes-No	
Yes-No		Yes-No	
Yes-No		Yes-No	

Section 6 - PCB & TSCA Information

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4.1) Provide a *detailed* description of the process(es) generating this waste (attach flow diagram if available):
Cleaning of Alloy Reconciliation Tank System using Caustic with Sun Clean. Sludge vacuumed in vac box along with cleaning solution and some plating solution

Based upon RCRA waste regulations (40 CFR 261) and Michigan Act 451 Rules. Waste Code(s)

4.2) Is this an EPA RCRA listed hazardous waste (F, K, P or U)? ☐ Yes ☒ No

4.3) Is this a MICHIGAN hazardous waste (Other than RCRA)? ☒ Yes ☒ No [redacted] D007 per John Fenoff 8/12/02

4.4) Is this a MICHIGAN nonhazardous liquid industrial waste? ☐ Yes ☒ No

4.5) Is this a UNIVERSAL waste? ☐ Yes ☒ No

4.6) Does this waste exceed LDR treatment standards? ☒ Yes ☐ No

4.7) Is this an EPA RCRA characteristic hazardous waste (D001-D043)? ☒ Yes ☐ No [redacted] D007

4.8) What is the flash point of this waste? ☐ <90° ☐ 90-140°F ☐ 140-199°F ☒ >200°F

VOID

4.9) Is the waste an oxidizer? ☐ Yes ☒ No

4.10) What is the pH of this waste? ☐ <2 ☒ 2-4.9 ☒ 5-10 ☐ 10.1-12.4 ☐ ≥12.5

4.11) Does this waste contain reactive cyanide ≥ 250 ppm? ☐ Yes ☒ No

4.12) Does this waste contain reactive sulfide ≥ 500 ppm? ☐ Yes ☒ No per Mark Gorski 8/12/02

4.13) Is the waste surcharge exempt? (attach surcharge form) ☐ Yes ☒ No

Code		Regulatory Level TCLP (mg/L)	Concentration (if above)	Code		Regulatory Level TCLP (mg/L)	Concentration (if above)
D004	Arsenic	5	☒ Below ☐ Above	D024	m-Cresol	200	☐ Below ☐ Above
D005	Barium	100	☒ Below ☐ Above	D025	p-Cresol	200	☐ Below ☐ Above
D006	Cadmium	1	☒ Below ☐ Above	D026	Cresols	200	☐ Below ☐ Above
D007	Chromium	5	☐ Below ☒ Above 6.5	D027	1,4-Dichlorobenzene	7.5	☐ Below ☐ Above
D008	Lead	5	☒ Below ☐ Above	D028	1,2-Dichloroethane	0.5	☐ Below ☐ Above
D009	Mercury	0.2	☒ Below ☐ Above	D029	1,1-Dichloroethylene	0.7	☐ Below ☐ Above
D010	Selenium	1	☒ Below ☐ Above	D030	2,4-Dinitrotoluene	0.13	☐ Below ☐ Above
D011	Silver	5	☒ Below ☐ Above	D031	Heptachlor	0.008	☐ Below ☐ Above
D012	Endrin	0.02	☐ Below ☐ Above	D032	Hexachlorobenzene	0	☐ Below ☐ Above
D013	Lindane	0.4	☐ Below ☐ Above	D033	Hexachlorobutadiene	0.5	☐ Below ☐ Above
D014	Methoxychlor	10	☐ Below ☐ Above	D034	Hexachloroethane	3.0	☐ Below ☐ Above
D015	Toxaphene	0.5	☐ Below ☐ Above	D035	Methyl Ethyl Ketone	200	☐ Below ☐ Above
D016	2,4-D	10	☐ Below ☐ Above	D036	Nitrobenzene	2	☐ Below ☐ Above
D017	2,4,5-TP(Silvex)	1	☐ Below ☐ Above	D037	Pentachlorophenol	100	☐ Below ☐ Above
D018	Benzene	0.5	☐ Below ☐ Above	D038	Pyridine	5	☐ Below ☐ Above
D019	CarbonTetrachloride	0.5	☐ Below ☐ Above	D039	Tetrachloroethylene	0.7	☐ Below ☐ Above
D020	Chlordane	0.03	☐ Below ☐ Above	D040	Trichloroethylene	0.5	☐ Below ☐ Above
D021	Chlorobenzene	100	☐ Below ☐ Above	D041	2,4,5-Trichlorophenol	400	☐ Below ☐ Above
D022	Chloroform	6.0	☐ Below ☐ Above	D042	2,4,6-Trichlorophenol	2	☐ Below ☐ Above
D023	o-Cresol	200	☐ Below ☐ Above	D043	Vinyl Chloride	0.2	☐ Below ☐ Above

VOID

4.14) The hazardous constituent information is based on: ☐ Analysis (Please attach for review) ☐ Generator Knowledge ☒ Both

4.15) If this is a characteristic (D-coded) hazardous waste, does it contain underlying hazardous constituents (List in Section5)? ☐ Yes ☒ No ☐ N/A per Mark Gorski 8/12/02

Section 5 - Constituent Information

Review the following items in the EQ Resource Guide and indicate their concentrations below:
1) MVOC (Michigan Volatile Organic Compounds) 2) CCVOC (Subpart CC Volatile Organic Compounds)
3) UHC (Underlying Hazardous Constituents) 4) TRI (Toxic Release Inventory Constituents)

Indicate all constituents in your waste stream, their concentrations, and circle Yes or No for UHC:

UHC?		UHC?	
Yes-No		Yes-No	
Yes-No		Yes-No	
Yes-No		Yes-No	

Section 6 - PCB & TSCA Information

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6.1) What is the concentration of PCBs in the waste? ☒ None ☐ 0-5 ppm ☐ 6-49 pp ☐ 50-499 ppm ☐ 500+ppm

6.2) Does the waste contain PCB contamination from a source with a concentration ≥50 ppm? ☐ Yes ☒ No

6.3) Does this waste contain free liquids? (use paint filter test) ☒ Yes ☐ No

6.4) Has this waste been processed into a non-liquid form? ☐ Yes ☒ No

If yes, what was the concentration of PCBs prior to processing? ☒ N/A ☐ 0-499 ppm ☐ 500+ ppm

6.5) Is the non-liquid PCB waste in the form of soil, rags, debris, or other contaminated media? ☐ Yes ☒ No

6.6) Are you a PCB capacitor manufacturer or a PCB equipment manufacturer? ☐ Yes ☒ No

6.7) Has the PCB Article (e.g., transformer, hydraulic machine, PCB-contaminated electrical equipment) been drained/flushed of all PCBs and decontaminated in accordance with 40 CFR 761.60(b)? ☒ N/A ☐ Yes ☐ No

Section 7 - Benzene NESHAP Information

NESHAP SIC CODES		
2812	2835	2875
2813	2841	2879
2816	2842	2891
2819	2843	2892
2821	2844	2893
2822	2851	2895
2823	2861	2899
2824	2865	2911
2833	2869	3312
2834	2873	4953
2835	2874	9511

7.1) Does the waste stream come from a facility with one of the SIC codes listed under NESHAP? ☐ Yes ☒ No

7.2) Does your company manage wastes from facilities with Total Annual Benzene (TAB) ≥10 Mg/year? ☐ Yes ☐ No

➔ *If you answered "NO" to question 7.1 AND 7.2 please skip to Section 8.*

7.3) Does the waste contain >10 % water? ☐ Yes ☐ No

7.4) What is the TAB quantity for your facility? _____ Mg/Year

7.5) Does the waste contain >1.0 mg/kg total Benzene? ☐ Yes ☐ No

7.6) What is the total Benzene concentration in your waste? _____ percent or _____ ppmw.

(Do not use TCLP analytical results. Acceptable laboratory methods include 8020, 8240, 8260, 602, and 624.)

Section 8 - Waste Constituent Information

➔ **COMPLETE FOR MICHIGAN DISPOSAL WASTE TREATMENT PLANT, WAYNE DISPOSAL, AND KOIS T&P**

8.1) Does this waste contain any "Potentially Chlorous Constituents" as defined in the EQ Resource Guide? ☐ Yes ☒ No

8.2) Does this waste contain any MVOC constituents as defined in the EQ Resource Guide? ☐ Yes ☒ No

8.3) Is this waste subject to Subpart CC regulation (i.e., contain ≥500ppm (VOCs) Volatile Organic Compounds)? ☐ Yes ☒ No

➔ If 8.1, 8.2 or 8.3 is "yes"--please indicate the constituents and their concentrations in the table provided in Section 5

see John Leonard @ 1 table

Section 9 - Reclamation/Recycling/Fuel Blending

➔ **Complete for Michigan Recovery Systems ONLY**

9.1) Heat value (BTU/lb): _____ Chlorine(%): _____ Water (%): _____ Solids (%): _____

9.2) Is this material a recoverable petroleum product? ☐ Yes ☐ No 9.3) Is this material for wastewater treatment? ☐ Yes ☐ No

➔ If 9.1 or 9.2 is "yes"-please attach the Wastewater Addendum Form found in the EQ Resource Guide.

Section 10 - Certification

I certify that all information (including attachments) is complete and factual and is an accurate representation of the known and suspected hazards, pertaining to the waste described herein. I authorize EQ's Resource Team to add supplemental information to the waste approval file, provided I am contacted and give verbal permission. I authorize EQ's Resource Team to obtain a sample from any waste shipment for purposes of verification and confirmation. I agree that, if EQ approves the waste described herein, all such wastes that are transported, delivered, or tendered to EQ by Generator or on Generator's behalf shall be subject to, and Generator shall be bound by, the attached Standard Terms and Conditions.

Generator Signature: Mark Gornick Printed Name: Mark Gornick

Company: Double Eagle Steel Coating Co Title: Env. Engineer Date: 6/28/02

The generator's signature must appear on the EQ Waste Characterization Report. If the generator has authorized a third-party to certify this document, a written notice (on generator letter head) must accompany this submittal.
Although the EQ Resource Team is authorized to make certain modifications to the information provided on this form, the addition or removal of waste codes and waste constituents must be documented by the generator.

STANDARD TERMS AND CONDITIONS

© 2000 EQ - The Environmental Quality Company

The Agreement between the Customer and EQ - The Environmental Quality Company and/or its related companies (hereinafter "EQ") related to or associated with Delivered Waste, as herein defined, shall be governed by the following Standard Terms and Conditions in addition to the terms and conditions contained in any Waste Characterization Report, Customer Approval Quote Confirmation, Generator Approval Notification, Notice of Waste Approval Expiration, and/or Credit Agreement associated with such Delivered Waste.

The Customer may use its standard forms (such as purchase orders, acknowledgments of orders, and invoices) to generate its dealings under this Agreement for convenience purposes, but all provisions thereof in conflict with these terms and conditions shall be deemed stricken.

Definitions

The following definitions shall apply for purposes of this Agreement:

"Acceptable Waste" shall mean any hazardous waste, as defined under applicable State or federal law, determined by EQ as acceptable for treatment and/or disposal in accordance with this Agreement.

"Delivered Wastes" shall mean all wastes (i) which are transported, delivered, or tendered to EQ by the Customer, (ii) which the Customer has arranged for the transport, delivery or tender to EQ, or (iii) which are transported, delivered, or tendered to EQ under a Credit Agreement between the Customer and EQ.

"Non-Conforming Wastes" shall mean wastes that (a) are not in accordance in all material respects with the warranties, assumptions, specifications or limitations stated in the Waste Characterization Report and this Agreement, (b) have constituents or components of a type or concentration not specifically identified in the Waste Characterization Report (i) which increase the nature or extent of the hazard and risk undertaken by EQ in handling and/or disposing of the waste, or (ii) for whose treatment and/or disposal a Waste Management Facility is not designed or permitted, or (iii) which increase the cost of treatment and/or disposal of waste beyond that specified in EQ's price quote, or (c) are not properly packaged, labeled, described or placarded or otherwise not in compliance with United States Department of Transportation and United States Environmental Protection Agency regulations.

Control of Operations.

EQ shall have sole control over all aspects of the operation of any treatment and/or disposal facility of EQ receiving Delivered Wastes under the Agreement (hereinafter, "Waste Management Facility"), including, without limitation, maintaining EQ's desired volume of Acceptable Wastes being delivered to any Waste Management Facility by the Customer or any other person or entity.

Identification of Waste

For each waste material to be transported, delivered, or tendered to EQ under this Agreement, the Customer shall provide, or cause to be provided, to EQ a representative sample of the waste material and a completed Waste Characterization Report containing a physical and chemical description or analysis of such waste material, which description shall conform with any and all guidelines for waste acceptance provided by EQ. On the basis of EQ's analysis of such representative sample of the waste material and such Waste Characterization Report, EQ will determine whether such wastes are Acceptable Wastes. EQ does not make any guarantee that it will handle any waste material or any particular quantity or type of waste material, and EQ reserves the right to the decline to transport, treat and/or dispose of waste material. The Customer shall promptly furnish to EQ any information regarding known, suspected or planned changes in the composition of the waste material. Further, the Customer shall promptly inform EQ of any change in the characteristic or condition of the waste material which becomes known to the Customer subsequent to the date of the Waste Characterization Report.

Non-Conforming Wastes

In the event that EQ at any time discovers that any Delivered Waste is Non-Conforming Waste, EQ may reject or revoke its acceptance of the Non-Conforming Waste. The Customer shall have seven (7) days to direct an alternative lawful manner of disposition of the waste, unless it is necessary by reason of law or otherwise to move the Non-Conforming Waste prior to expiration of the seven (7) day period. If the Customer does not direct an alternative disposal, at its option, EQ may return any such Non-Conforming Wastes to the Customer, and the Customer shall pay or reimburse EQ for all costs and expenses incurred by EQ in connection with the receipt, handling, sampling, analysis, transportation and return to the Customer of such Non-Conforming Wastes. If it is impossible or impractical for EQ to return the Non-Conforming Waste to the Customer, the Customer shall reimburse EQ for all costs, of any type or nature whatsoever, incurred by EQ, solely because such Delivered Waste was Non-Conforming Waste (including, but not limited to, all costs associated with any remedial steps necessary, due to the nature of the Non-Conforming Waste, in connection with material with which the Non-Conforming Waste may have been commingled and all expenses and charges for analyzing, handling, locating, preparing for transporting, storing and disposing of any Non-Conforming Waste).

Customer Warranty - Acceptable Wastes

All Delivered Wastes shall be Acceptable Wastes and shall conform in all material respects to the description and specifications contained in the Waste Characterization Report. The information set forth in the Waste Characterization Report or any manifest, placard or label associated with any Delivered Wastes, or otherwise represented by the Customer or the generator (if other than the Customer) to EQ, is and shall be true, accurate and complete as of the date of receipt of the involved waste by EQ.

Customer Warranty - Title to Wastes.

Either the Customer or the generator (if other than the Customer) shall hold clear title, free of any all liens, claims, encumbrances, and charges to Delivered Waste until such waste is accepted by EQ.

Customer Warranty - Compliance with Laws.

The Customer shall comply with all applicable federal, state and local environmental statutes, regulations, and other governmental requirements, as well as directives issued by EQ from time to time, governing the transportation, treatment and/or disposal of Acceptable Wastes, including, but not limited to, of packaging, manifesting, containerization, placarding and labeling requirements.

Customer Warranty - Updating Information.

If the Customer receives information that Delivered Waste or other hazardous waste described in the Waste Characterization Report, or some component of such waste, presents or may present a hazard or risk to persons, property or the environment which was not disclosed to EQ, or if the Customer or generator (if other than the Customer) has changed the process by which such waste results, the Customer shall promptly report such information to EQ in writing.

Customer Indemnity

The Customer shall indemnify, defend and hold harmless EQ, and its affiliated or related companies, and all of their respective present or future officers, directors, shareholders, employees and agents from and against any and all losses, damages, liabilities, penalties, fines, forfeitures, demands, claims, causes of action, suits, costs and expenses (including, but not limited to, reasonable costs of defense, settlement, and reasonable attorneys' fees), which may be asserted against any or all of them by any person or any governmental agency, or which any or all of them may hereafter suffer, incur, be responsible for or pay out, as a result of or in connection with: bodily injuries (including, but not limited to, death, sickness, disease and emotional or mental distress) to any person (including EQ's employees); damage (including, but not limited to, loss of use) to any property (public or private); or any requirements to conduct or incur expenses for investigative, removal or remedial expenses in connection with contamination of or adverse effect on the environment, or any violation or alleged violation of any statutes, ordinances, orders, rules or regulations of any governmental entity or agency, caused or arising out of (i) a breach of this Agreement by the Customer, (ii) the failure of any warranty of the Customer to be true, accurate and complete, or (iii) any willful or negligent act or omission of the Customer, or its employees or agents in connection with the performance of this Agreement.

Force Majeure

EQ shall not be liable for any failure to accept, receive, handle, treat, and/or dispose of Delivered Waste due to an act of God, fire, casualty, flood, war, strike, lockout, labor trouble, failure of public utilities, equipment failure, facility shutdown, injunction, accident, epidemic, riot, insurrection, destruction of or operation or transportation facilities, the inability to procure materials, equipment, or sufficient personnel or energy in order to meet operational needs without the necessity of an accident, the failure or inability to obtain any governmental approvals or to meet Environmental Requirements (including, but not limited to, voluntary or involuntary compliance with any act, exercise, assertion, or requirement of any governmental authority) which may temporarily or permanently prohibit operations of EQ, the Customer, or the Generator, or any other circumstances beyond the control of EQ which prevents or delays performance of any of its obligations under this Agreement.

Governing Laws

This Agreement shall in all respects be governed by and shall be construed in accordance with the laws of the State of Michigan applied to contracts executed and performed wholly within such state.

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22345 Koetsier Drive
Novi, MI 48375
248 344 1775
Fax 248 344.2654

Clayton
GROUP SERVICES

June 27, 2002

Mark Gornick
DOUBLE EAGLE STEEL COATING COMPANY
3000 Miller Road
Dearborn, MI 48120-

Clayton Work Order No. 02060754

Reference:

Dear Mark Gornick:

Clayton Group Services received 1 sample on 6/25/2002 for the analyses presented in the following report.

Enclosed is a copy of the Chain-of-Custody record acknowledging receipt of these samples. Please note that any unused portion of the samples will be discarded 30 days after the date of this report, unless you have requested otherwise.

This material is confidential and is intended solely for the person to whom it is addressed. If this is received in error, please contact the number provided below.

We appreciate the opportunity to assist you. If you have any questions concerning this report, please contact a Client Services Representative at (800) 806-5887.

Sincerely,

Karen Coonan

Karen Coonan
Client Services Representative

cc:

Clayton

CASE NARRATIVE

Date: 27-Jun-02

CLIENT: DOUBLE EAGLE STEEL COATING COMPANY

Project:

Work Order No 02060754

Analytical comments:
The Clayton Novi Laboratory is NELAP and AIHA accredited. These accreditations require that we provide the following information on each report: As an analytical result progresses above the reporting limit (RL), it has less variability than a result reported at, or near, the RL.

Unless otherwise indicated, any industrial hygiene results have not been blank corrected.

Clayton

ANALYTICAL RESULTS

Date: 27-Jun-02

CLIENT: DOUBLE EAGLE STEEL COATING COMPANY

Client Sample ID: SLUDGE FROM ALLOY RECIRC TK AFTER CLEANING

Work Order No: 02060754

Tag Number:

Project:

Collection Date: 6/25/2002

Lab ID: 02060754-001A

Matrix: SLUDGE

Analyses	Result	Reporting Limit	Qual	Units	DF	Date Analyzed
IGNITABILITY: METHOD EPA 1010						Analyst: LRB
Ignitability	>200	0		°F	1	6/26/2002
PH: METHOD EPA 150.1						Analyst: LRB
pH	5.8	1.0		pH Units	1	6/26/2002 12:45:00 PM
REACTIVE CYANIDE, EPA SW 846 CHAPTER 7.3.3.2						Analyst: CAC
Reactive Cyanide	ND	0.10		mg/L	1	6/27/2002
REACTIVE SULFIDE; EPA SW 846 CHAPTER 7.3.4.2						Analyst: CAC
Reactive Sulfide	ND	100		mg/L	1	6/26/2002

Qualifiers:

ND - Not Detected at the Reporting Limit (RL)
J - Analyte detected below the Reporting Limit
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
E - Value above quantitation range
T - Tentatively Identified Compound (TIC)

Clayton

ANALYTICAL RESULTS

Date: 27-Jun-02

CLIENT: DOUBLE EAGLE STEEL COATING COMPANY

Client Sample ID: SLUDGE FR[illegible] ALLOY RECIRC TK AFTER CL[illegible]NING

Work Order No: 02060754

Tag Number:

Project:

Collection Date: 6-25-2002

Lab ID: 02060754-001B

Matrix: LEACHATE

Analyses	Result	Reporting Limit	Qual	Units	DF	Date Analyzed
ICP METALS:LEACHATE: METHOD EPA 6010B						Analyst: DH
Arsenic	0.18	0.10		mg/L	1	6/26/2002
Barium	0.17	0.10		mg/L	1	6/26/2002
Cadmium	0.074	0.020		mg/L	1	6/26/2002
Chromium	6.5	0.10		mg/L	1	6/26/2002
Lead	ND	0.10		mg/L	1	6/26/2002
Selenium	ND	0.20		mg/L	1	6/26/2002
Silver	ND	0.020		mg/L	1	6/26/2002
MERCURY; METHOD EPA 1311/7470A						Analyst: DH
Mercury	ND	0.0010		mg/L	1	6/26/2002

Qualifiers:

ND - Not Detected at the Reporting Limit (RL)

J - Analyte detected below the Reporting Limit

B - Analyte detected in the associated Method Blank

* - Value exceeds Maximum Contaminant Level

S - Spike Recovery outside accepted recovery limits

R - RPD outside accepted recovery limits

E - Value above quantitation range

I - Tentatively Identified Compound (TIC)

22345 Roethel Drive
Novi, MI 48375
248.344.1770
Fax 248.344.2654

Clayton
GROUP SERVICES

T#: 50855

June 27, 2002

Mark Gornick
DOUBLE EAGLE STEEL COATING COMPANY
3000 Miller Road
Dearborn, MI 48120-

Clayton Work Order No. 02060754

Reference:

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Clayton Group Services received 1 sample on 6/25/2002 for the analyses presented in the following report.

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This material is confidential and is intended solely for the person to whom it is addressed. If this is received in error, please contact the number provided below.

We appreciate the opportunity to assist you. If you have any questions concerning this report, please contact a Client Services Representative at (800) 806-5887.

Sincerely,

Karen Coonan

Karen Coonan
Client Services Representative

cc:

Georgia
SITE 2

Clayton

CASE NARRATIVE

Date: 27-Jun-02

CLIENT: DOUBLE EAGLE STEEL COATING COMPANY

Project:

Work Order No 02060754

Analytical comments:
The Clayton Novi Laboratory is NELAP and AIHA accredited. These accreditations require that we provide the following information on each report: As an analytical result progresses above the reporting limit (RL), it has less variability than a result reported at, or near, the RL.

Unless otherwise indicated, any industrial hygiene results have not been blank corrected.

Clayton

ANALYTICAL RESULTS

Date: 27-Jun-02

CLIENT: DOUBLE EAGLE STEEL COATING COMPANY

Client Sample ID: SLUDGE FROM ALLOY RECIRC TK AFTER CLEANING

Work Order No: 02060754

Tag Number:

Project:

Collection Date: 6/25/2002

Lab ID: 02060754-001A

Matrix: SLUDGE

Analyses	Result	Reporting Limit	Qual	Units	DF	Date Analyzed
IGNITABILITY: METHOD EPA 1010						Analyst: LRB
Ignitability	>200	0		°F	1	6/26/2002
PH: METHOD EPA 150.1						Analyst: LRB
pH	5.8	1.0		pH Units	1	6/26/2002 12:45:00 PM
REACTIVE CYANIDE. EPA SW 846 CHAPTER 7.3.3.2						Analyst: CAC
Reactive Cyanide	ND	0.10		mg/L	1	6/27/2002
REACTIVE SULFIDE: EPA SW 846 CHAPTER 7.3.4.2						Analyst: CAC
Reactive Sulfide	ND	100		mg/L	1	6/26/2002

Qualifiers:

ND - Not Detected at the Reporting Limit (RL)
J - Analyte detected below the Reporting Limit
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
E - Value above quantitation range
T - Tentatively Identified Compound (TIC)

Clayton

ANALYTICAL RESULTS

Date: 27-Jun-02

CLIENT: DOUBLE EAGLE STEEL COATING COMPANY

Client Sample ID: SLUDGE FROM ALLOY RECIRC TK AFTER CLEANING

Work Order No: 02060754

Tag Number:

Project:

Collection Date: 6/25/2002

Lab ID: 02060754-001B

Matrix: LEACHATE

Analyses	Result	Reporting Limit	Qual	Units	DF	Date Analyzed
						Analyst: DH
ICP METALS:LEACHATE: METHOD EPA 6010B						
Arsenic	0.18	0.10		mg/L	1	6/26/2002
Barium	0.17	0.10		mg/L	1	6/26/2002
Cadmium	0.074	0.020		mg/L	1	6/26/2002
Chromium	6.5	0.10		mg/L	1	6/26/2002
Lead	ND	0.10		mg/L	1	6/26/2002
Selenium	ND	0.20		mg/L	1	6/26/2002
Silver	ND	0.020		mg/L	1	6/26/2002
						Analyst: DH
MERCURY; METHOD EPA 1311/7470A						
Mercury	ND	0.0010		mg/L	1	6/26/2002

Qualifiers:

ND - Not Detected at the Reporting Limit (RL)

J - Analyte detected below the Reporting Limit

B - Analyte detected in the associated Method Blank

* - Value exceeds Maximum Contaminant Level

S - Spike Recovery outside accepted recovery limits

R - RPD outside accepted recovery limits

E - Value above quantitation range

T - Tentatively Identified Compound (TIC)

Clayton Group Services

Date: 27-Jun-02

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 02060754
Project:

QC SUMMARY REPORT
Method Blank

Sample ID: MB-6736 | Batch ID: 6736 | Test Code: 6010L | Units: mg/L | Analysis Date 6/26/2002 | Prep Date: 6/26/2002
Client ID: | Run ID: ME_PE3C_020626A | SeqNo: 277515

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	ND	0.1									
Barium	ND	0.1									
Cadmium	ND	0.02									
Chromium	ND	0.1									
Lead	ND	0.1									
Selenium	ND	0.2									
Silver	ND	0.02									

Sample ID: MB-6735 | Batch ID: 6735 | Test Code: 7470L | Units: mg/L | Analysis Date 6/26/2002 | Prep Date: 6/26/2002
Client ID: | Run ID: ME_PE3C_020626C | SeqNo: 277524

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Mercury	ND	0.001									

Sample ID: R6 | Batch ID: R24070 | Test Code: RCN_W | Units: mg/L | Analysis Date 6/27/2002 | Prep Date:
Client ID: | Run ID: WC_PE10J_020627A | SeqNo: 277740

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Reactive Cyanide	0.00862	0.1									J

Sample ID: lb | Batch ID: R24059 | Test Code: RS_W | Units: mg/L | Analysis Date: 6/26/2002 | Prep Date:
Client ID: | Run ID: WC_MA7G_020626A | SeqNo: 277721

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Reactive Sulfide	ND	100									

Qualifiers: ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

Clayton Group Services

Date: 27-Jun-02

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 02060754
Project:

QC SUMMARY REPORT

Laboratory Control Spike

Sample ID: LCS-6736 | Batch ID: 6736 | Test Code: 6010L | Units: mg/L | Analysis Date 6/26/2002 | Prep Date: 6/26/2002
Client ID: | Run ID: ME_PE3C_020626A | SeqNo: 277516

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	4.6	0.1	5	0	92	77.8	114	0			
Barium	4.9	0.1	5	0	98	90.2	106	0			
Cadmium	4.95	0.02	5	0	99	84.2	114	0			
Chromium	4.81	0.1	5	0	96.2	80.1	116	0			
Lead	4.73	0.1	5	0	94.6	77.9	116	0			
Selenium	4.62	0.2	5	0	92.4	79.4	112	0			
Silver	4.76	0.02	5	0	95.2	88.2	114	0			

Sample ID: LCS-6735 | Batch ID: 6735 | Test Code: 7470L | Units: mg/L | Analysis Date 6/26/2002 | Prep Date: 6/26/2002
Client ID: | Run ID: ME_PE3C_020626C | SeqNo: 277525

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Mercury	0.00195	0.001	0.002	0	97.5	70.8	126	0			

Sample ID: r-1 | Batch ID: R24070 | Test Code: RCN_W | Units: mg/L | Analysis Date 6/27/2002 | Prep Date:
Client ID: | Run ID: WC_PE10J_020627A | SeqNo: 277741

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Reactive Cyanide	8.59	0.1	100	0	8.59	0.5	15	0			

Sample ID: r-2 | Batch ID: R24070 | Test Code: RCN_W | Units: mg/L | Analysis Date 6/27/2002 | Prep Date:
Client ID: | Run ID: WC_PE10J_020627A | SeqNo: 277742

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Reactive Cyanide	9.108	0.1	100	0	9.11	0.5	15	8.59	5.85	9.9	S

Qualifiers: ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 02060754
Project:

QC SUMMARY REPORT
Laboratory Control Spike

Sample ID: r-1 | Batch ID: R24069 | Test Code: RS_W | Units: mg/L | Analysis Date 6/26/2002 | Prep Date:
Client ID: | Run ID: WC_MA7G_020626A | SeqNo: 277722

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Reactive Sulfide	125.1	100	211.1	0	59.3	0.5	121	0			

Sample ID: r-2 | Batch ID: R24069 | Test Code: RS_W | Units: mg/L | Analysis Date 6/26/2002 | Prep Date:
Client ID: | Run ID: WC_MA7G_020626A | SeqNo: 277723

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Reactive Sulfide	130.6	100	211.1	0	61.9	0.5	121	125.1	4.32	0	

Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

Clayton Group Services

Date: 27-Jun-02

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 02060754
Project:

QC SUMMARY REPORT

Sample Matrix Spike

Sample ID: 02060754-001B MS | Batch ID: 6736 | Test Code: 6010L | Units: mg/L | Analysis Date 6/26/2002 | Prep Date: 6/26/2002
Client ID: SLUDGE FROM ALLOY R | Run ID. ME_PE3C_020626A | SeqNo: 277518

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	5.43	0.1	5	0.177	105	76.9	136	0			
Barium	4.97	0.1	5	0.166	96.1	70.4	135	0			
Cadmium	4.83	0.02	5	0.0739	95.1	75.9	132	0			
Chromium	10.89	0.1	5	6.47	88.4	72.6	129	0			
Lead	4.3	0.1	5	0	86	77	132	0			
Selenium	5.37	0.2	5	0	107	65	142	0			
Silver	5.5	0.02	5	0	110	79.5	122	0			

Sample ID: 02060754-001B MSD | Batch ID: 6736 | Test Code: 6010L | Units: mg/L | Analysis Date 6/26/2002 | Prep Date: 6/26/2002
Client ID: SLUDGE FROM ALLOY R | Run ID. ME_PE3C_020626A | SeqNo: 277519

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	5.46	0.1	5	0.177	106	76.9	136	5.43	0.551	11.9	
Barium	5.02	0.1	5	0.166	97.1	70.4	135	4.97	1	10.4	
Cadmium	4.83	0.02	5	0.0739	95.1	75.9	132	4.83	0	15.8	
Chromium	11.25	0.1	5	6.47	95.6	72.6	129	10.89	3.25	23.1	
Lead	4.22	0.1	5	0	84.4	77	132	4.3	1.88	11.3	
Selenium	5.27	0.2	5	0	105	65	142	5.37	1.88	14.9	
Silver	5.62	0.02	5	0	112	79.5	122	5.5	2.16	8.98	

Sample ID: 02060591-004B MS | Batch ID: 6735 | Test Code: 7470L | Units: mg/L | Analysis Date 6/26/2002 | Prep Date: 6/26/2002
Client ID: | Run ID: ME_PE3C_020626C | SeqNo: 277530

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Mercury	0.00206	0.001	0.002	0	103	61.6	131	0			

Qualifiers: ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 02060754
Project:

QC SUMMARY REPORT
Sample Matrix Spike Duplicate

Sample ID: 02050591-004B MSD | Batch ID: 6735 | Test Code: 7470L | Units: mg/L | Analysis Date: 6/26/2002 | Prep Date: 6/26/2002
Client ID: | Run ID: ME_PE3C_020626C | SeqNo: 277531

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Mercury	0.00206	0.001	0.002	0	103	61.6	131	0.00206	0	10	

Qualifiers: ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

Clayton GROUP SERVICES

REQUEST FOR LABORATORY ANALYTICAL SERVICES

IMPORTANT
Date Results Requested: 6/27/02
Rush Charges Authorized? ☒ Yes ☐ No
☐ Phone or ☒ Fax Results or email results @ bsu.com

Page 1 of 1

For Clayton Use Only
Clayton Lab Project No. 02060754

REPORT RESULTS TO
Name: Mark Gornick
Company: Double Eagle Steel Co.
Mailing Address: 3000 Miller Rd.
City, State, Zip: Dearborn MI 48120
Telephone No.:
FAX No.: 313 203-7705
Client Job No.: /
Dept.:

SEND INVOICE TO
Purchase Order No.:
Name:
Company:
Dept.:
Address:
City, State, Zip:

Special Instructions and/or specific regulatory requirements: (method, limit of detection, etc.)

Samples are: (check if applicable)
☐ Drinking Water
☐ Groundwater
☐ Wastewater
☒ WASTE

* Explanation of Preservative

ANALYSES REQUESTED (Enter an 'X' in the box below to indicate request. Enter a '*' if Preservative added *)

CLIENT SAMPLE IDENTIFICATION	DATE SAMPLED	TIME SAMPLED	MATRIX/ MEDIA	AIR VOLUME (specify units)	Number of Containers	MIS TCLP	RCI									FOR LAB USE ONLY
Sludge from Alloy Recycle TK after cleaning	6/25/02	1315	SL		1	X	X									

CHAIN OF CUSTODY
Collected by: KSD (print)
Relinquished by: Mark Gornick — Date/Time 6/25/02 1715
Relinquished by: — Date/Time
Method of Shipment:
Collector's Signature: KSD
Received by: 6/25/02 — Date/Time
Received by: — Date/Time
Received at Lab by: — Date/Time 6/25 2:37
Sample Condition Upon Receipt: ☒ Acceptable ☐ Other (explain)
Authorized by: Mark Gornick (Client Signature MUST Accompany Request) — Date 6/25/02

Please return completed form and samples to one of the Clayton Group Services, Inc. labs listed below:

Detroit Regional Lab
22345 Roethel Drive
Novi, MI 48375
(800) 805-5887
(248) 344-1770
FAX (248) 344-2655

Atlanta Regional Lab
3380 Chastain Meadows Parkway, Suite 300
Kennesaw, GA 30144
(800) 252-9919
(770) 499-7500
FAX (770) 423-4990

Seattle Regional Lab
4838 E. Marginal Way S., Suite 215
Seattle, WA 98134
(800) 568-7755
(206) 763-7364
FAX (206) 763-4189

DISTRIBUTION
White - Clayton Laboratory
Yellow - Clayton Accounting
Pink - Client Copy

INK: BK

0 41 gal MDI

EQ Tracking # 23699
Sample ID #

WASTE CHARACTERIZATION REPORT

TO EXPEDITE YOUR WASTE APPROVAL, PLEASE COMPLETE THIS FORM ENTIRELY

Please Choose One EQ Management Facility

- ☒ **Michigan Disposal Waste Treatment Plant** (Stabilization and Treatment) — 49350 N. I-94 Service Drive Belleville, MI 48111 — Phone: 800-592-5489 Fax: 800-592-5329 — EPA ID # MID 000 724 831
- ☐ **Wayne Disposal, Inc. Site #2 Landfill** (Hazardous & Chemical Waste Landfill) — 49350 N. I-94 Service Drive Belleville, MI 48111 — Phone: 800-592-5489 Fax: 800-592-5329 — EPA ID # MID 048 090 633
- ☐ **Michigan Recovery Systems, Inc.** (Solvent Recycling, Fuel Blending, WW Treatment) — 36345 Van Born Road Romulus, MI 48174 — Phone: 800-521-0998 Fax: 734-326-9375 — EPA ID # MID 060 975 844
- ☐ **EQIS – Transfer & Processing** (Drum Transfer/Non-Hazardous Liquid Processing) — 1010 Old Rawsonville Road Ypsilanti, MI 48197 — Phone: 734-547-1000 Fax: 734-480-9195 — EPA ID # MIR 000 033 969

Section 1 - Generator & Customer Information

from EQAI cm 5/24/01

SIC # _____

Generator EPA ID # MID 981 092 190

Generator: DOUBLE EAGLE STEEL COATINGS

Facility Address: 3000 Miller ROAD

City: Dearborn State: MI Zip: 48120

County: WAYNE

Mailing Address (if different)

City: _____ State: _____ Zip: _____

Generator Contact: Mark Gornick

Title: ENVIRONMENTAL ENGR.

Phone: (313)203-9829 Fax: (313)203-8705

EQ Customer No. _____

Invoicing Company: EQ Industrial Services

Address: 36500 CARPENTER RD

City: YPSILANTI State: MI Zip: 48197

Country: _____

Invoicing Contact: Karen Newcomer

Phone: (734)677-8822 Fax: (734)677-8844

Technical Contact: John Leonard

Phone: _____ Fax: _____

Section 2 - Shipping and Packaging Information

2.1) Shipping volume: 250,000

Shipping frequency: ○ One Time Only ● Annual

2.2) DOT shipping name: WASTE CORROSIVE LIQUID, N.O.S. (Sodium Hydroxide)

Density: ____ lbs./gallon or lbs./cubic yard (or) Specific Gravity: ____

8, UN1760, PG II

2.3) Packaging: (check all that apply)

- ☐ Bulk Solid (Yd^3 < 2000 lbs/yd^3)
- ☐ Bulk Solid (Ton >2000 lbs/yd^3)
- ☒ Bulk Liquids (Gallons)
- ☐ Cubic Yard Boxes
- ☐ Drums
- ☐ Other (palletized, 5 gal. pails, etc.) _____

Quoted bulk disposal charges for solid materials will be billed by the cubic yd., if waste density is less than 2,000 lbs. per cubic yd. If waste density is greater than 2,000 lbs. per cubic yd., then bulk disposal charges will be billed by the ton regardless of the approved container.

Section 3 - Physical Characteristics

WASTE COMMON NAME: DOWNTURN CAUSTIC

3.1) Color (describe): TAN

3.2) Odor (describe): MILD

3.3) Physical state at 70 °F: (check all that apply)
☐ Solid ☐ Dust ☒ Liquid ☐ Sludge

3.4) Does this waste contain?: (check all that apply)
☒ Free Liquids ☐ Metal fines ☐ Powders ☒ Oily residue
☐ Biodegradable sorbents ☐ NONE

3.5) Does this waste contain?: (check all that apply) ☒ NONE
☐ Asbestos - friable ☐ Pyrophoric waste
☐ Asbestos - non-friable ☐ Reactive waste
☐ Dioxins ☐ Shock Sensitive waste
☐ Furans ☐ Radioactive waste
☐ Biohazard ☐ Explosives

3.6) Describe the composition of the waste (i.e. key chemical compounds, soil, water, ppe, debris, etc.):

Sodium Hydroxide	to 90 %
Dirt/Sediment	to 3 %
OIL	to 7 %
	to ___ %
	Total = 100 %

3.7) Does this waste contain > 50% contaminated soil? ○ Yes ● No

3.8) Does this waste contain >50% debris by volume? (debris is greater than 2.5 inches in size) ○ Yes ● No

EQ Tracking #

Section 4 - Generating Process and Regulatory Information

4.1) Provide a *detailed* description of the process (es) generating this waste (attach flow diagram if available):
clean up of high current density recirculating system (tanks, sumps) for cleaning coiled steel prior to galvanizing.

Based upon RCRA waste regulations (40 CFR 261) and Michigan Act 451 Rules: Waste Code(s)

4.2) Is this an **EPA RCRA** listed hazardous waste (F, K, P or U)? ○ Yes ● No
4.3) Is this a **MICHIGAN** hazardous waste (Other than RCRA)? ○ Yes ● No
4.4) Is this a **MICHIGAN** nonhazardous liquid industrial waste? ○ Yes ● No
4.5) Is this a **UNIVERSAL** waste? ○ Yes ● No
4.6) Does this waste exceed **LDR** treatment standards? ● Yes ○ No
4.7) Is this an **EPA RCRA** characteristic hazardous waste (D001-D043)? ● Yes ○ No D002
4.8) What is the flash point of this waste? ○ <90°F ○ 90-140°F ○ 140-199°F ● ≥200°F
4.9) Is the waste an oxidizer? ○ Yes ● No
4.10) What is the pH of this waste? ○ <2 ○ 2-4.9 ○ 5-10 ○ 10.1-12.4 ● ≥12.5
4.11) Does this waste contain reactive cyanide ≥ 250 ppm? ○ Yes ● No
4.12) Does this waste contain reactive sulfide ≥ 500 ppm? ○ Yes ● No
4.13) Is the waste surcharge exempt? (attach surcharge form) ○ Yes ● No

Code		Regulatory Level TCLP (mg/L)	Concentration (if above)
D004	Arsenic	5	● Below ○ Above
D005	Barium	100	● Below ○ Above
D006	Cadmium	1	● Below ○ Above
D007	Chromium	5	● Below ○ Above
D008	Lead	5	● Below ○ Above
D009	Mercury	0.2	● Below ○ Above
D010	Selenium	1	● Below ○ Above
D011	Silver	5	● Below ○ Above
D012	Endrin	0.02	● Below ○ Above
D013	Lindane	0.4	● Below ○ Above
D014	Methoxychlor	10	● Below ○ Above
D015	Toxaphene	0.5	● Below ○ Above
D016	2,4-D	10	● Below ○ Above
D017	2,4,5-TP(Silvex)	1	● Below ○ Above
D018	Benzene	0.5	● Below ○ Above
D019	CarbonTetrachloride	0.5	● Below ○ Above
D020	Chlordane	0.03	● Below ○ Above
D021	Chlorobenzene	100	● Below ○ Above
D022	Chloroform	6.0	● Below ○ Above
D023	o-Cresol	200	● Below ○ Above

Code		Regulatory Level TCLP (mg/L)	Concentration (if above)
D024	m-Cresol	200	● Below ○ Above
D025	p-Cresol	200	● Below ○ Above
D026	Cresols	200	● Below ○ Above
D027	1,4-Dichlorobenzene	7.5	● Below ○ Above
D028	1,2-Dichloroethane	0.5	● Below ○ Above
D029	1,1-Dichloroethylene	0.7	● Below ○ Above
D030	2,4-Dinitrotoluene	0.13	● Below ○ Above
D031	Heptachlor	0.008	● Below ○ Above
D032	Hexachlorobenzene	0.13	● Below ○ Above
D033	Hexachlorobutadiene	0.5	● Below ○ Above
D034	Hexachloroethane	3.0	● Below ○ Above
D035	Methyl Ethyl Ketone	200	● Below ○ Above
D036	Nitrobenzene	2	● Below ○ Above
D037	Pentachlorophenol	100	● Below ○ Above
D038	Pyridine	5	● Below ○ Above
D039	Tetrachloroethylene	0.7	● Below ○ Above
D040	Trichloroethylene	0.5	● Below ○ Above
D041	2,4,5-Trichlorophenol	400	● Below ○ Above
D042	2,4,6-Trichlorophenol	2	● Below ○ Above
D043	Vinyl Chloride	0.2	● Below ○ Above

4.14) The hazardous constituent information is based on: ● Analysis (Please attach for review) ● Generator Knowledge ○ Both

4.15) If this is a characteristic (D-coded) hazardous waste, does it contain underlying hazardous constituents (List in Section5)? ○ Yes ● No ○ N/A

Section 5 - Constituent Information

Review the following items in the EQ Resource Guide and indicate their concentrations below:
1) **MVOC** (Michigan Volatile Organic Compounds) 2) **CCVOC** (Subpart CC Volatile Organic Compounds)
3) **UHC** (Underlying Hazardous Constituents) 4) **TRI** (Toxic Release Inventory Constituents)

Indicate all constituents in your waste stream, their concentrations, and select Yes or No for UHC:

UHC?	
○ Yes ○ No	
○ Yes ○ No	
○ Yes ○ No	

UHC?	
○ Yes ○ No	
○ Yes ○ No	
○ Yes ○ No	

EQ Tracking #

Section 6 - PCB & TSCA Information

6.1) What is the concentration of PCBs in the waste? ☒ None ○ 0-5 ppm ○ 6-49 ppm ○ 50-499 ppm ○ 500+ppm

6.2) Does the waste contain PCB contamination from a source with a concentration ≥50 ppm? ○ Yes ☒ No

6.3) Does this waste contain free liquids? (use paint filter test) ☒ Yes ○ No

6.4) Has this waste been processed into a non-liquid form? ○ Yes ☒ No

If yes, what was the concentration of PCBs prior to processing? ☒ N/A ○ 0-499 ppm ○ 500+ ppm

6.5) Is the non-liquid PCB waste in the form of soil, rags, debris, or other contaminated media? ○ Yes ☒ No

6.6) Are you a PCB capacitor manufacturer or a PCB equipment manufacturer? ○ Yes ☒ No

6.7) Has the PCB Article (e.g., transformer, hydraulic machine, PCB-contaminated electrical equipment) been drained/flushed of all PCBs and decontaminated in accordance with 40 CFR 761.60(b)? ☒ N/A ○ Yes ○ No

Section 7 - Benzene NESHAP Information

NESHAP SIC CODES		
2812	2836	2875
2813	2841	2879
2816	2842	2891
2819	2843	2892
2821	2844	2893
2822	2851	2895
2823	2861	2899
2824	2865	2911
2833	2869	3312
2834	2873	4953
2835	2874	9511

7.1) Does this waste stream contain Benzene? (if "no" to 7.1, please skip to section 8) ○ Yes ☒ No

7.2) Does the waste stream come from a facility with one of the SIC codes listed under NESHAP? ○ Yes ☒ No

7.3) Does your company manage wastes from facilities with Total Annual Benzene(TAB)≥10 Mg/year? ○ Yes ○ No

➔ *If you answered "NO" to question 7.2 AND 7.3 please skip to Section 8.*

7.4) Does the waste contain >10 % water? ○ Yes ○ No

7.5) What is the TAB quantity for your facility?_____Mg/Year

7.6) Does the waste contain >1.0 mg/kg total Benzene? ○ Yes ○ No

7.7) What is the total Benzene concentration in your waste? _____percent or _____ppmw.

(Do not use TCLP analytical results. Acceptable laboratory methods include 8020, 8240, 8260, 602, and 624.)

Section 8 - Waste Constituent Information

➔ COMPLETE FOR MICHIGAN DISPOSAL WASTE TREATMENT PLANT, WAYNE DISPOSAL, AND EQIS T&P

8.1) Does this waste contain any "Potentially Odorous Constituents" as defined in the EQ Resource Guide? ○ Yes ☒ No

8.2) Does this waste contain any MVOC constituents as defined in the EQ Resource Guide? ○ Yes ☒ No

8.3) Is this waste subject to Subpart CC regulation (i.e., contain ≥500ppm (VOCs) Volatile Organic Compounds)? ○ Yes ☒ No

➔ If 8.1, 8.2 or 8.3 is "yes"--please indicate the constituents and their concentrations in the table provided in Section 5

Section 9 - Reclamation/Recycling/Fuel Blending

➔ **Complete for Michigan Recovery Systems ONLY**

9.1) Heat value (BTU/lb):_____Chlorine(%):_____Water (%):_____Solids (%):_____

9.2) Is this material a recoverable petroleum product? ○ Yes ○ No

9.3) Is this material for wastewater treatment? ○ Yes ○ No

➔ If 9.1 or 9.2 is "yes"-please attach the **Wastewater Addendum Form** found in the **EQ Resource Guide.**

Section 10 - Certification

I certify that all information (including attachments) is complete and factual and is an accurate representation of the known and suspected hazards, pertaining to the waste described herein. I authorize EQ's Resource Team to add supplemental information to the waste approval file, provided I am contacted and give verbal permission. I authorize EQ's Resource Team to obtain a sample from any waste shipment for purposes of verification and confirmation. I agree that, if EQ approves the waste described herein, all such wastes that are transported, delivered, or tendered to EQ by Generator or on Generator's behalf shall be subject to, and Generator shall be bound by, the attached Standard Terms and Conditions.

Generator Signature Mark Barnish Printed Name Mark Barnish

Company Double Eagle Company Title ENV. ENG Date 5/14/01

The generator's signature must appear on the EQ Waste Characterization Report. If the generator has authorized a third-party to certify this document, a written notice (on generator letterhead) must accompany this submittal.
Although the EQ Resource Team is authorized to make certain modifications to the information provided on this form, the addition or removal of waste codes and waste constituents must be documented by the generator.

LAND DISPOSAL RESTRICTION & CERTIFICATION FORM 6/98

Please check the facility you are shipping to:

☑ Michigan Disposal Waste Treatment Plant
(Stabilization and Treatment)
49350 N. I-94 Service Drive
Belleville, MI 48111
EPA ID # MID 006 724 531

☐ Wayne Disposal, Inc.
Subtitle C Landfill
(Secure Hazardous Waste Landfill)
49350 N. I-94 Service Drive
Belleville, MI 48111
EPA ID # MID 048 090 633

☐ Michigan Recovery Systems, Inc.
(Solvent Recycling, Fuel Blending & Wastewater Treatment)
28345 Van Born Road
Romulus, MI 48174
EPA ID # MID 060 375 344

Generator Name: DOUBLE EAGLE STEEL Generator USEPA ID No. MID 981092190

Generator Address: 3000 Miller Road Dearborn, MI 48120

State Manifest No. _____ Manifest Doc. No. _____

INSTRUCTIONS

- In Column 1 identify all USEPA hazardous waste codes that apply to this waste shipment.
- In Column 2, choose the appropriate treatability group: Non-Wastewater (NWW) or Wastewater (WW).
- In Column 3, enter the appropriate Subcategory, if applicable, and also enter "Contaminated Soil" or "Debris" if the waste will be treated using one of the alternative treatment technologies provided by 268.49(c) (soil) or 268.45 (debris).
- In Column 4, circle the letter of the appropriate paragraph from Pages 1-2 of this form.
- In Column 5, for F001-F005, F039, D001-D043, Debris & Contaminated Soil wastes, enter the Reference Number(s) from the EQ Resource Guide—LDR/UHC Constituent Table for any constituents subject to treatment in your waste stream.

Manifest Line Item #	1. USEPA HAZARDOUS WASTE CODE(S)	2. NWW or WW	3. SUBCATEGORY	4. HOW MUST THE WASTE BE MANAGED? (Circle one)	5. REFERENCE NUMBER(S) of Hazardous Constituents contained in the waste. Complete for F001-F005, F039, D001-D043, Soil & Debris wastes.
11.A	D002	☑ NWW ☐ WW		A B C D E F G H I J K L M S	
11.B		☐ NWW ☐ WW		A B C D E F G H I J K L M S	
11.C		☐ NWW ☐ WW		A B C D E F G H I J K L M S	
11.D		☐ NWW ☐ WW		A B C D E F G H I J K L M S	

I hereby certify that all information submitted on this and all associated documents is complete and accurate to the best of my knowledge and information.

Generator Signature: Mark Gorecki Title: Environmental Engineer

Printed Name: MARK GORECKI Date: 5/15/01

HOW MUST THE WASTE BE MANAGED?

For 5, circle the appropriate response for the 3 *italicized* options:

5. THIS CONTAMINATED SOIL *DOES / DOES NOT* (CIRCLE ONE) CONTAIN LISTED HAZARDOUS WASTE AND *DOES / DOES NOT* (CIRCLE ONE) EXHIBIT A CHARACTERISTIC OF HAZARDOUS WASTE AND *IS SUBJECT TO / COMPLIES WITH* (CIRCLE ONE) THE SOIL TREATMENT STANDARDS AS PROVIDED BY 268.49(c) OR THE UNIVERSAL TREATMENT STANDARDS. I certify under penalty of law that I have personal knowledge and am familiar with the treatment technology and operation of the treatment process used to support this certification and believe that it has been maintained and operated properly so as to comply with treatment standards specified in 40 CFR 268.49 without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

070202 MBF ALLOY CHROME SLUDGE

TO Georgia (734) 698-3477
From Mark Gorski

EQ Tracking # _____

WASTE CHARACTERIZATION REPORT

TO EXPEDITE YOUR WASTE APPROVAL, PLEASE COMPLETE THIS FORM ENTIRELY

Please Choose One EQ Management Facility

☒ Michigan Disposal Waste Treatment Plant (Stabilization and Treatment)	49350 N. I-94 Service Drive Phone: 800-592-5489	Belleville, MI 48111 Fax: 800-592-5329	EPA ID # MID 000 724 831
☒ Wayne Disposal, Inc. Site #2 Landfill (Hazardous & Chemical Waste Landfill)	49350 N. I-94 Service Drive Phone: 800-592-5489	Belleville, MI 48111 Fax: 800-592-5329	EPA ID # MID 048 090 633
☐ Michigan Recovery Systems, Inc. (Solvent Recycling, Fuel Blending, WW Treatment)	36345 Van Born Road Phone: 800-521-0998	Romulus, MI 48174 Fax: 734-326-9375	EPA ID # MID 060 975 844
☐ EQIS – Transfer & Processing (Drum Transfer-Non-Hazardous Liquid Processing)	1010 Old Rawsonville Road Phone: 734-547-1000	Ypsilanti, MI 48197 Fax: 734-480-9195	EPA ID # MIR 000 003 969

Section 1 - Generator & Customer Information

SIC # 1790/190

Generator EPA ID # MID981090190

Generator Double Eagle Steel Coating Co.

Facility Address 3000 Miller Road

City Wayne State MI Zip 48120

County Wayne

Mailing Address (if different) _____

City _____ State _____ Zip _____

Generator Contact Mark Gorski

Title Environmental Engineer

Phone 313-303-9829 Fax 313-303-9705

EQ Customer No. _____

Invoicing Company EQIS

Address _____

City _____ State _____ Zip _____

Country _____

Invoicing Contact Al Gordon

Phone 734-677-8822 Fax 734-677-8844

Technical Contact John Leonard

Phone 734-677-8822 Fax 734-677-8844

Section 2 - Shipping and Packaging Information

2.1) Shipping volume: 20 to 40 yards

2.2) Shipping frequency: ☒ One Time Only ☐ Annual

2.2) DOT shipping name

RQ Hazardous Waste Liquid UN3082
Class 9, PG III (Chromium)

per John Leonard 8/7/06

2.3) Packaging: (check all that apply)

- ☐ Bulk Solid (Yd³ <2000 lbs/yd³)
- ☐ Bulk Solid (Ton >2000 lbs/yd³)
- ☐ Bulk Liquids (Gallons)
- ☒ Cubic Yard Boxes
- ☐ Drums
- ☐ Other (palletized, 5 gal. pails, etc.) _____

Quoted bulk disposal charges for solid materials will be billed by the cubic yd., if waste density is less than 2,000 lbs. per cubic yd. If waste density is greater than 2,000 lbs. per cubic yd., then bulk disposal charges will be billed by the ton regardless of the approved container.

Section 3 - Physical Characteristics

WASTE COMMON NAME: Sludge from Alloy Recirc. Tank after cleaning

3.1) Color (describe): Brown/Black

3.2) Odor (describe): Slight

3.3) Physical state at 70 °F: (check all that apply)

☐ Solid ☐ Dust ☒ Liquid ☒ Sludge

3.4) Does this waste contain? (check all that apply)

☒ Free Liquids ☐ Metal fines ☐ Powders ☐ Oily residue
☐ Biodegradable sorbants ☐ NONE

3.5) Does this waste contain?: (check all that apply) ☒ NONE

- ☐ Asbestos - friable
- ☐ Asbestos - non-friable
- ☐ Dioxins
- ☐ Furans
- ☐ Biohazard
- ☐ Pyrophoric waste
- ☐ Reactive waste
- ☐ Shock Sensitive waste
- ☐ Radioactive waste
- ☐ Explosives

3.6) Describe the composition of the waste (i.e. key chemical compounds, soil, water, ppe, debris, etc.):

Sludge	40 to 50 %
Free Liquid	20 to 25 %
Solids	20 to 25 %
	to %

Total = 100 %

3.7) Does this waste contain > 50% contaminated soil? ☐ Yes ☒ No

3.8) Does this waste contain >50% debris by volume? ☐ Yes ☒ No (debris is greater than 2.5 inches in size)

Section 4 - Generating Process and Regulatory Information

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ALLOY CHROME SLUDGE 070202 MBF

4.1) Provide a *detailed* description of the process (es) generating this waste (attach flow diagram if available):
Cleaning of Alloy Recirculation Tank System using Caustic with Sun Clean. Sludge Overcovered in vac box along with cleaning solution and some plating solution

Based upon RCRA waste regulations (40 CFR 261) and Michigan Act 451 Rules: Waste Code(s)

4.2) Is this an EPA RCRA listed hazardous waste (F, K, P or U)?	☐ Yes	☒ No	
4.3) Is this a MICHIGAN hazardous waste (Other than RCRA)?	☒ Yes	☐ No	D007
4.4) Is this a MICHIGAN nonhazardous liquid industrial waste?	☐ Yes	☒ No	
4.5) Is this a UNIVERSAL waste?	☐ Yes	☒ No	
4.6) Does this waste exceed LDR treatment standards?	☒ Yes	☐ No	
4.7) Is this an EPA RCRA characteristic hazardous waste (D001-D043)?	☒ Yes	☐ No	D007
4.8) What is the flash point of this waste?	☐ <90°F	☐ 90-140°F	☐ 140-199°F	☒ >200°F
4.9) Is the waste an oxidizer?	☐ Yes	☒ No	
4.10) What is the pH of this waste?	☐ <2	☒ 2-4.9	☒ 5-10	☐ 10.1-12.4	☐ ≥12.5
4.11) Does this waste contain reactive cyanide ≥ 250 ppm?	☐ Yes	☒ No	
4.12) Does this waste contain reactive sulfide ≥ 500 ppm?	☐ Yes	☒ No	
4.13) Is the waste surcharge exempt? (attach surcharge form)	☐ Yes	☒ No	

Code		Regulatory Level TCLP (mg/L)	Concentration (if above)	Code		Regulatory Level TCLP (mg/L)	Concentration (if above)
D004	Arsenic	5	☒ Below ☐ Above	D024	m-Cresol	200	☒ Below ☐ Above
D005	Barium	100	☒ Below ☐ Above	D025	p-Cresol	200	☒ Below ☐ Above
D006	Cadmium	1	☒ Below ☐ Above	D026	Cresols	200	☒ Below ☐ Above
D007	Chromium	5	☐ Below ☒ Above 6.5	D027	1,4-Dichlorobenzene	7.5	☒ Below ☐ Above
D008	Lead	5	☒ Below ☐ Above	D028	1,2-Dichloroethane	0.5	☒ Below ☐ Above
D009	Mercury	0.2	☒ Below ☐ Above	D029	1,1-Dichloroethylene	0.7	☒ Below ☐ Above
D010	Selenium	1	☒ Below ☐ Above	D030	2,4-Dinitrotoluene	0.13	☒ Below ☐ Above
D011	Silver	5	☒ Below ☐ Above	D031	Heptachlor	0.008	☒ Below ☐ Above
D012	Endrin	0.02	☒ Below ☐ Above	D032	Hexachlorobenzene	0.13	☒ Below ☐ Above
D013	Lindane	0.4	☒ Below ☐ Above	D033	Hexachlorobutadiene	0.5	☒ Below ☐ Above
D014	Methoxychlor	10	☒ Below ☐ Above	D034	Hexachloroethane	3.0	☒ Below ☐ Above
D015	Toxaphene	0.5	☒ Below ☐ Above	D035	Methyl Ethyl Ketone	200	☒ Below ☐ Above
D016	2,4-D	10	☒ Below ☐ Above	D036	Nitrobenzene	2	☒ Below ☐ Above
D017	2,4,5-TP(Silvex)	1	☒ Below ☐ Above	D037	Pentachlorophenol	100	☒ Below ☐ Above
D018	Benzene	0.5	☒ Below ☐ Above	D038	Pyridine	5	☒ Below ☐ Above
D019	CarbonTetrachloride	0.5	☒ Below ☐ Above	D039	Tetrachloroethylene	0.7	☒ Below ☐ Above
D020	Chlordane	0.03	☒ Below ☐ Above	D040	Trichloroethylene	0.5	☒ Below ☐ Above
D021	Chlorobenzene	100	☒ Below ☐ Above	D041	2,4,5-Trichlorophenol	400	☒ Below ☐ Above
D022	Chloroform	6.0	☒ Below ☐ Above	D042	2,4,6-Trichlorophenol	2	☒ Below ☐ Above
D023	o-Cresol	200	☒ Below ☐ Above	D043	Vinyl Chloride	0.2	☒ Below ☐ Above

4.14) The hazardous constituent information is based on: ☐ Analysis (Please attach for review) ☐ Generator Knowledge ☒ Both

4.15) If this is a characteristic (D-coded) hazardous waste, does it contain underlying hazardous constituents (List in Section5)? ☐ Yes ☒ No ☐ N/A

Section 5 - Constituent Information

Review the following items in the EQ Resource Guide and indicate their concentrations below:
1) MVOC (Michigan Volatile Organic Compounds) 2) CCVOC (Subpart CC Volatile Organic Compounds)
3) UHC (Underlying Hazardous Constituents) 4) TRI (Toxic Release Inventory Constituents)

Indicate all constituents in your waste stream, their concentrations, and circle Yes or No for UHC:

UHC?		UHC?	
Yes-No		Yes-No	
Yes-No		Yes-No	
Yes-No		Yes-No	

Section 6 - PCB & TSCA Information

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4.1) Provide a *detailed* description of the process(es) generating this waste (attach flow diagram if available):
Cleaning of Alloy Recirculation Tank System using Caustic with Sum Clean. Sludge vacuumed in VOC box. Along with cleaning solution and some plating solution

Based upon RCRA waste regulations (40 CFR 261) and Michigan Act 451 Rules. Waste Code(s)

4.2) Is this an EPA RCRA listed hazardous waste (F, K, P or U)?	☐ Yes	☒ No	
4.3) Is this a MICHIGAN hazardous waste (Other than RCRA)?	☒ Yes	☒ No	[redacted] D007
4.4) Is this a MICHIGAN nonhazardous liquid industrial waste?	☐ Yes	☒ No	
4.5) Is this a UNIVERSAL waste?	☐ Yes	☒ No	
4.6) Does this waste exceed LDR treatment standards?	☒ Yes	☐ No	
4.7) Is this an EPA RCRA characteristic hazardous waste (D001-D043)?	☒ Yes	☐ No	[redacted] D007
4.8) What is the flash point of this waste?	☐ <90°	☐ 90-140°F	☐ 140-199°F ☒ >200°F
4.9) Is the waste an oxidizer?	☐ Yes	☒ No	
4.10) What is the pH of this waste?	☐ <2 ☒ 2-4.9	☒ 5-10	☐ 10.1-12.4 ☐ ≥12.5
4.11) Does this waste contain reactive cyanide ≥ 250 ppm?	☐ Yes	☒ No	
4.12) Does this waste contain reactive sulfide ≥ 500 ppm?	☐ Yes	☒ No	
4.13) Is the waste surcharge exempt? (attach surcharge form)	☐ Yes	☒ No	

VOID

Code		Regulatory Level TCLP (mg/L)	Concentration (If above)	Code		Regulatory Level TCLP (mg/L)	Concentration (If above)
D004	Arsenic	5	☒ Below ☐ Above	D024	m-Cresol	200	☐ Below ☐ Above
D005	Barium	100	☒ Below ☐ Above	D025	p-Cresol	200	☐ Below ☐ Above
D006	Cadmium	1	☒ Below ☐ Above	D026	Cresols	200	☐ Below ☐ Above
D007	Chromium	5	☐ Below ☒ Above 6.5	D027	1,4-Dichlorobenzene	7.5	☐ Below ☐ Above
D008	Lead	5	☒ Below ☐ Above	D028	1,2-Dichloroethane	0.5	☐ Below ☐ Above
D009	Mercury	0.2	☒ Below ☐ Above	D029	1,1-Dichloroethylene	0.7	☐ Below ☐ Above
D010	Selenium	1	☒ Below ☐ Above	D030	2,4-Dinitrotoluene	0.13	☐ Below ☐ Above
D011	Silver	5	☒ Below ☐ Above	D031	Heptachlor	0.008	☐ Below ☐ Above
D012	Endrin	0.02	☐ Below ☐ Above	D032	Hexachlorobenzene	0	☐ Below ☐ Above
D013	Lindane	0.4	☐ Below ☐ Above	D033	Hexachlorobutadiene	0.5	☐ Below ☐ Above
D014	Methoxychlor	10	☐ Below ☐ Above	D034	Hexachloroethane	3.0	☐ Below ☐ Above
D015	Toxaphene	0.5	☐ Below ☐ Above	D035	Methyl Ethyl Ketone	200	☐ Below ☐ Above
D016	2,4-D	10	☐ Below ☐ Above	D036	Nitrobenzene	2	☐ Below ☐ Above
D017	2,4,5-TP(Silvex)	1	☐ Below ☐ Above	D037	Pentachlorophenol	100	☐ Below ☐ Above
D018	Benzene	0.5	☐ Below ☐ Above	D038	Pyridine	5	☐ Below ☐ Above
D019	CarbonTetrachloride	0.5	☐ Below ☐ Above	D039	Tetrachloroethylene	0.7	☐ Below ☐ Above
D020	Chlordane	0.03	☐ Below ☐ Above	D040	Trichloroethylene	0.5	☐ Below ☐ Above
D021	Chlorobenzene	100	☐ Below ☐ Above	D041	2,4,5-Trichlorophenol	400	☐ Below ☐ Above
D022	Chloroform	6.0	☐ Below ☐ Above	D042	2,4,6-Trichlorophenol	2	☐ Below ☐ Above
D023	o-Cresol	200	☐ Below ☐ Above	D043	Vinyl Chloride	0.2	☐ Below ☐ Above

4.14) The hazardous constituent information is based on: ☐ Analysis (Please attach for review) ☐ Generator Knowledge ☒ Both

4.15) If this is a characteristic (D-coded) hazardous waste, does it contain underlying hazardous constituents (List in Section 5)? ☐ Yes ☒ No ☐ N/A

Section 5 - Constituent Information

Review the following items in the EQ Resource Guide and indicate their concentrations below:
1) MVOC (Michigan Volatile Organic Compounds) 2) CCVOC (Subpart CC Volatile Organic Compounds)
3) UHC (Underlying Hazardous Constituents) 4) TRI (Toxic Release Inventory Constituents)

Indicate all constituents in your waste stream, their concentrations, and circle Yes or No (for UHC).

UHC?			UHC?		
Yes-No			Yes-No		
Yes-No			Yes-No		
Yes-No			Yes-No		

Section 6 - PCB & TSCA Information

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6.1) What is the concentration of PCBs in the waste? ■ None ☐ 0-5 ppm ☐ 6-49 ppm ☐ 50-499 ppm ☐ 500+ ppm

6.2) Does the waste contain PCB contamination from a source with a concentration ≥50 ppm? ☐ Yes ■ No

6.3) Does this waste contain free liquids? (use paint filter test) ■ Yes ☐ No

6.4) Has this waste been processed into a non-liquid form? ☐ Yes ■ No

If yes, what was the concentration of PCBs prior to processing? ■ N/A ☐ 0-499 ppm ☐ 500+ ppm

6.5) Is the non-liquid PCB waste in the form of soil, rags, debris, or other contaminated media? ☐ Yes ■ No

6.6) Are you a PCB capacitor manufacturer or a PCB equipment manufacturer? ☐ Yes ■ No

6.7) Has the PCB Article (e.g., transformer, hydraulic machine, PCB-contaminated electrical equipment) been drained/flushed of all PCBs and decontaminated in accordance with 40 CFR 761.60(b)? ■ N/A ☐ Yes ☐ No

Section 7 - Benzene NESHAP Information

NESHAP SIC CODES		
2812	2836	2875
2813	2841	2879
2816	2842	2891
2819	2843	2892
2821	2844	2893
2822	2851	2895
2823	2861	2899
2824	2865	2911
2833	2869	3312
2834	2873	4953
2835	2874	9511

7.1) Does the waste stream come from a facility with one of the SIC codes listed under NESHAP? ☐ Yes ■ No

7.2) Does your company manage wastes from facilities with Total Annual Benzene (TAB) ≥10 Mg/year? ☐ Yes ☐ No

➔ *If you answered "NO" to question 7.1 AND 7.2 please skip to Section 8.*

7.3) Does the waste contain >10 % water? ☐ Yes ☐ No

7.4) What is the TAB quantity for your facility? _____ Mg/Year

7.5) Does the waste contain >1.0 mg/kg total Benzene? ☐ Yes ☐ No

7.6) What is the total Benzene concentration in your waste? _____ percent or _____ ppmw.

(Do not use TCLP analytical results. Acceptable laboratory methods include 8020, 8240, 8260, 602, and 624.)

Section 8 - Waste Constituent Information

➔ **COMPLETE FOR MICHIGAN DISPOSAL WASTE TREATMENT PLANT, WAYNE DISPOSAL, AND EQIS T&P**

8.1) Does this waste contain any "Potentially Corrosive Constituents" as defined in the EQ Resource Guide? ☐ Yes ■ No

8.2) Does this waste contain any MVOC constituents as defined in the EQ Resource Guide? ☐ Yes ☒ No

8.3) Is this waste subject to Subpart CC regulation (i.e., contain ≥500ppm (VOCs) Volatile Organic Compounds)? ☐ Yes ☒ No

➔ If 8.1, 8.2 or 8.3 is "yes"--please indicate the constituents and their concentrations in the table provided in Section 5

per John Lonard 11/28/05

Section 9 - Reclamation/Recycling/Fuel Blending

➔ **Complete for Michigan Recovery Systems ONLY**

9.1) Heat value (BTU/lb): _____ Chlorine(%): _____ Water (%) _____ Solids (%): _____

9.2) Is this material a recoverable petroleum product? ☐ Yes ☐ No 9.3) Is this material for wastewater treatment? ☐ Yes ☐ No

➔ If 9.1 or 9.2 is "yes"-please attach the Wastewater Addendum Form found in the EQ Resource Guide.

Section 10 - Certification

I certify that all information (including attachments) is complete and factual and is an accurate representation of the known and suspected hazards, pertaining to the waste described herein. I authorize EQ's Resource Team to add supplemental information to the waste approval file, provided I am contacted and give verbal permission. I authorize EQ's Resource Team to obtain a sample from any waste shipment for purposes of verification and confirmation. I agree that, if EQ approves the waste described herein, all such wastes that are transported, delivered, or tendered to EQ by Generator or on Generator's behalf shall be subject to, and Generator shall be bound by, the attached Standard Terms and Conditions.

Generator Signature [signature] Printed Name Mark Gorzich

Company Double Eagle Steel Coating Co Title Envi. Engineer Date 11/28/05

The generator's signature must appear on the EQ Waste Characterization Report. If the generator has authorized a third-party to certify this document, a written notice (on generator letter-head) must accompany this submittal.
Although the EQ Resource Team is authorized to make certain modifications to the information provided on this form, the addition or removal of waste codes and waste constituents must be documented by the generator.

STANDARD TERMS AND CONDITIONS

© 2000 EQ - The Environmental Quality Company

114442

WASTE CHARACTERIZATION REPORT

metals treat

I authorize EQ – The Environmental Quality Company to choose the appropriate method of waste management, from the technologies offered, at the EQ facilities identified below.

☒ **Michigan Disposal Waste Treatment Plant** (Stabilization and Treatment)	49350 N. I-94 Service Drive, Belleville, MI 48111 Phone: 800-592-5489 Fax: 800-592-5329		EPA ID # MID 000 724 831
☐ **Wayne Disposal, Inc. Site #2 Landfill** (Hazardous & Chemical Waste Landfill)	49350 N. I-94 Service Drive, Belleville, MI 48111 Phone: 800-592-5489 Fax: 800-592-5329		EPA ID # MID 048 090 633
☒ **EQ Detroit, Inc.** (Stabilization, Wastewater Treatment)	1923 Frederick Street, Detroit, MI 48211 Phone: 800-495-6059 Fax: 313-923-3375		EPA ID # MID 980 991 566
☐ **EQ Resource Recovery, Inc.** (Solvent Recycling, Fuel Blending, WW Treatment)	36345 Van Born Road, Romulus, MI 48174 Phone: 866-373-8357 Fax: 734-326-4033		EPA ID # MID 060 975 844
☐ **EQ North Carolina** (Stabilization, Treatment, Labpack Decommissioning)	1005 Investment Blvd, Apex, NC 27502 Phone: 919-363-4700 Fax: 919-363-4714		EPA ID # NCD 982 170 292
☐ **EQ Florida, Inc.** (Drum Consolidation, Labpack Decommissioning)	7202 East 8th Ave, Tampa, FL 33619 Phone: 800-624-5302 Fax: 813-628-0842		EPA ID # FLD 981 932 494
☐ **EQ Transfer & Processing** (Drum Transfer/Non-Hazardous Waste Processing)	1010 Old Rawsonville Rd., Ypsilanti, MI 48198 Phone: 734-547-1000 Fax: 734-480-9195		EPA ID #MI0 000 263 871 EPA ID #MIR 000 033 969
☐ **EQ Indianapolis** (Drum Transfer/Non-Hazardous Waste Processing)	4000 West 10th Street, Indianapolis, IN 46222 Phone: 317-247-7160 Fax: 317-247-7170		EPA ID #MI0 000 263 871
☐ **EQ Atlanta** (Drum Transfer/Non-Hazardous Waste Processing)	5600 Fulton Industrial Blvd SW, Atlanta, GA 30336 Phone: 404-494-3520 Fax: 404-494-3560		EPA ID #MI0 000 263 871
☐ **EQ Augusta, Inc.** (Wastewater Treatment)	3920 Goshen Industrial Blvd, Augusta, GA 30906 Phone: 706-771-9100 Fax: 706-771-9124		EPA ID # GAR 000 011 817

Waste Common Name: DOCR 10 ~~[illegible]~~ SLUDGE

Section 1 – Generator & Customer Information

SIC/NAICS* _____

Generator EPA ID # MID 981 092 190

Generator DOUBLE EAGLE STEEL

Facility Address 3000 MILLER ROAD

City Dearborn State MI Zip 48120

County WAYNE

Mailing Address _____

City _____ State _____ Zip _____

Generator Contact CHRISTOPHER McBEE

Title ENV. ENGINEER

Phone 313 203 9829 Fax 313 203 9705

*For a list of NAICS codes, please refer to Section 9 of the EQ Resource Guide.

Internal Use Only: EQ Division [redacted]

Invoicing Company EQIS

Address _____

City _____ State _____ Zip _____

Country _____

Invoicing Contact _____

Phone _____ Fax _____

Technical Contact _____

Phone _____ Fax _____

Mobile _____ Pager _____

E-mail _____

Section 2 – Shipping & Packaging Information

2.1) Shipping Volume & Frequency ☒ [redacted]
☐ One Time Only ☐ Year ☐ Quarter [redacted]

2.2) DOT Shipping Name _____
OTHER WASTE
1029

Is this waste surcharge exempt? ☐ Yes ☒ No
If yes, please attach a surcharge exemption form, found in Section 2 of the EQ Resource Guide.

2.4) Packaging (check all that apply)
☐ Bulk Solid (Yd³ < 2000 lbs/yd³)
☐ Bulk Solid (Ton > 2000 lbs/yd³)
☒ Bulk Liquids (Gallon)
☐ Totes, Size _____
☐ Cubic Yard Boxes/Bags
☐ Drums
☐ Other (palletized, 5 gal. Pail, etc.) _____
Quoted bulk disposal charges for solid materials will be billed by the cubic yard, if the waste density is less than 2,000lbs./cubic yard. If waste density is greater than 2,000 lbs./cubic yard, then bulk disposal charges will be billed by the ton, regardless of the approved container.

HOGGE DOCR 10 SLUDGE

Section 3 – Physical Characteristics

3.1) Color RUST to Black 3.2) Odor NONE

3.3) Does this waste contain any "Potentially Odorous Constituents" as defined in the EQ Resource Guide? (Section 3) ☐ Yes ☒ No

3.4) Physical State at 70°F: ☐ Solid ☐ Dust/Powder ☐ Liquid ☒ Sludge

3.5) What is the pH of this waste? ☐ ≤2 ☒ 2.1-4.9 ☐ 5-10 ☐ 10.1-12.4 ☐ ≥12.5

3.6) What is the flash point of this waste? ☐ <90°F ☐ 90-140°F ☐ 140-199°F ☒ >200°F

3.7) Does this waste contain? (check all that apply) ☐ None ☒ Free Liquids ☐ Oily Residue ☐ Metal Fines

☐ Biodegradable Sorbents ☐ Amines ☐ Ammonia ☐ Dioxins ☐ Furans ☐ Biohazard

☐ Shock Sensitive Waste ☐ Reactive Waste ☐ Radioactive Waste ☐ Explosives ☐ Pyrophoric Waste ☐ Isocyanates

☐ Asbestos – non-friable ☐ Asbestos – friable

Section 4 – Waste Composition and Generating Process

4.1) Describe the physical composition of the waste (i.e., soil, water, PPE, debris, key chemical compounds, etc.)

SLUDGE 100 to 100 % ____ to ____ %

____ to ____ % ____ to ____ %

Total: 100%

4.2) Provide a *detailed* description of the process generating this waste (attach flow diagram if available).

SLUDGE FILTER PRESS RESIDUE - LIQUID. PROCESS IS ZINC PLATING SOLUTIONS FROM STEEL GALVANIZING OPERATIONS. SAME MATERIAL AS EQ APPROVAL NUMBER KF042843 (DOCK 10/15 FILTERCAKE).

Section 5 – Hazardous or Non-Hazardous Waste?

Please refer to Section 5 of the EQ Resource Guide for a list of waste codes

As determined by 40 CFR, Part 261 and State Rules:			Please list applicable waste code(s):
5.1) Is this an EPA RCRA listed hazardous waste (F, K, P or U)?	☐ Yes	☒ No	
5.2) Is this an EPA RCRA characteristic hazardous waste (D001-D043)?	☐ Yes	☒ No	
5.3) Do any State Waste Codes apply?	☒ Yes	☐ No	029L
5.4) Is this waste intended for wastewater treatment?	☐ Yes*	☒ No	

*If you answered 'no' to 5.1, 5.2, and 5.3, please skip to Section 7. *If you answered 'yes' to 5.4, please attach the Waste Characterization Report Addendum found in Section 7 of the EQ Resource Guide.*

Section 6 – Hazardous Wastes

6.1) Does this waste exceed Land Disposal Restriction levels? ☐ Yes ☒ No

6.1a) If this waste stream is greater than 50% soil, does it meet the alternative soil treatment standards of 40 CFR 268.49? ☐ Yes ☒ No

6.1b) Does this waste contain greater than 50% debris, by volume? (Debris is greater than 2.5 inches in size.) ☐ Yes ☒ No

6.2) Is the waste an oxidizer (D001)? ☐ Yes ☒ No

6.3) Does this waste contain reactive cyanide ≥250 ppm (D003)? ☐ Yes ☒ No

6.4) Does this waste contain reactive sulfide ≥500 ppm (D003)? ☐ Yes ☒ No

6.5) Please indicate which constituent concentrations are below or above the regulatory level. Please indicate the basis used in the determination. Either "Below" or "Above" MUST be checked for each constituent.

Based On: ☒ Generator Knowledge ☒ Analysis* ☐ MSDS* *Please attach a copy.

Code		Regulatory Level TCLP (mg/l)	Concentration (if above)
D004	Arsenic	5	☒ Below ☐ Above ____
D005	Barium	100	☒ Below ☐ Above ____
D006	Cadmium	1	☒ Below ☐ Above ____
D007	Chromium	5	☒ Below ☐ Above ____
D008	Lead	5	☒ Below ☐ Above ____
D009	Mercury	0.2	☒ Below ☐ Above ____
D010	Selenium	1	☒ Below ☐ Above ____
D011	Silver	5	☒ Below ☐ Above ____
D012	Endrin	0.02	☒ Below ☐ Above ____
D013	Lindane	0.4	☒ Below ☐ Above ____
D014	Methoxychlor	10	☒ Below ☐ Above ____
D015	Toxaphene	0.5	☒ Below ☐ Above ____
D016	2,4-D	10	☒ Below ☐ Above ____
D017	2,4,5-TP (Silvex)	1	☒ Below ☐ Above ____
D018	Benzene	0.5	☒ Below ☐ Above ____
D019	Carbon Tetrachloride	0.5	☒ Below ☐ Above ____
D020	Chlordane	0.03	☒ Below ☐ Above ____
D021	Chlorobenzene	100	☒ Below ☐ Above ____
D022	Chloroform	6.0	☒ Below ☐ Above ____
D023	o-Cresol	200	☒ Below ☐ Above ____
D024	m-Cresol	200	☒ Below ☐ Above ____
D025	p-Cresol	200	☒ Below ☐ Above ____
D026	Cresols	200	☒ Below ☐ Above ____
D027	1,4-Dichlorobenzene	7.5	☒ Below ☐ Above ____
D028	1,2-Dicholoroethane	0.5	☒ Below ☐ Above ____
D029	1,1-Dichloroethylene	0.7	☒ Below ☐ Above ____
D030	2,4-Dinitrotoluene	0.13	☒ Below ☐ Above ____
D031	Heptachlor	0.008	☒ Below ☐ Above ____
D032	Hexachlorobenzene	0.13	☒ Below ☐ Above ____
D033	Hexachlorobutadiene	0.5	☒ Below ☐ Above ____
D034	Hexachloroethane	3.0	☒ Below ☐ Above ____
D035	Methyl Ethyl Ketone	200	☒ Below ☐ Above ____
D036	Nitrobenzene	2	☒ Below ☐ Above ____
D037	Pentachlorophenol	100	☒ Below ☐ Above ____
D038	Pyridine	5	☒ Below ☐ Above ____
D039	Tetrachloroethylene	0.7	☒ Below ☐ Above ____
D040	Trichloroethylene	0.5	☒ Below ☐ Above ____
D041	2,4,5-Trichlorophenol	400	☒ Below ☐ Above ____
D042	2,4,6-Trichlorophenol	2	☒ Below ☐ Above ____
D043	Vinyl Chloride	0.2	☒ Below ☐ Above ____

6.6) If this is a characteristic hazardous waste, does it contain underlying hazardous constituents? ☐ Yes ☒ No

If yes, please list the constituents in Section 11.

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Section 7 – Non-Hazardous Wastes

For a complete list of non-hazardous waste codes, please refer to Section 7 of the EQ Resource Guide

Please list applicable waste code:

7.1) Is this a Michigan non-hazardous liquid industrial waste? ☐ Yes ☒ No
7.2) Is this a Universal waste? ☐ Yes ☒ No
7.3) Is this a Recyclable Commodity? (e.g.: computer monitors, free mercury, etc.) ☐ Yes ☒ No
7.4) Is this waste a recoverable petroleum product? ☐ Yes* ☒ No
7.5) Is this waste used oil as defined by 40 CFR Part 279? ☐ Yes* ☒ No

If you answered 'yes' to questions 7.4 or 7.5 please attach the Waste Characterization Report Addendum found in Section 7 of the EQ Resource Guide.

Section 8 – TSCA Information

8.1) What is the concentration of PCBs in the waste? ☒ None ☐ 0-5 ppm ☐ 6-49 ppm ☐ 50-499 ppm ☐ 500+ ppm
8.2) Does the waste contain PCB contamination from a source with a concentration ≥ 50 ppm? ☐ Yes ☒ No
If you answered "no" to 8.1 and 8.2, please skip to Section 9.
8.3) Has this waste been processed into a non-liquid form? ☐ Yes ☐ No
If yes, what was the concentration of PCBs prior to processing? ☐ N/A ☐ 0-499 ppm ☐ 500+ ppm
8.4) Is the non-liquid PCB waste in the form of soil, rags, debris, or other contaminated media? ☐ Yes ☐ No
8.5) Are you a PCB capacitor manufacturer or a PCB equipment manufacturer? ☐ Yes ☐ No
8.6) Has the PCB Article (e.g., transformer, hydraulic machine, PCB-contaminated electrical equipment) been drained/flushed of all PCBs and decontaminated in accordance with 40 CFR 761.60(b)? ☐ N/A ☐ Yes ☐ No

Section 9 – Clean Air Act Information

NESHAP SIC*		
2812	2836	2875
2813	2841	2879
2816	2842	2891
2819	2843	2892
2821	2844	2893
2822	2851	2895
2823	2861	2899
2824	2865	2911
2833	2869	3312
2834	2873	4953
2835	2874	9511

9.1) Is this waste subject to regulation under 40 CFR, Part 63, Subpart DD or 40 CFR, Part 264, Subpart CC (RCRA)? ☐ Yes ☒ No
(Does the waste contain >500 ppm Volatile Organic Hazardous Air Pollutants – VOHAP's or Volatile Organic Compounds – VOC's?)
For a complete list of VOHAP's, please see Section 11 of the EQ Resource Guide
9.2) Does this waste stream contain Benzene? ☐ Yes ☒ No
If you answered "no" to 9.2, please skip to Section 10.
9.3) Does the waste stream come from a facility with one of the SIC codes listed under the NESHAP? ☐ Yes ☐ No
9.4) Is the generating source of this waste stream a facility with Total Annual Benzene (TAB) ≥10 Mg/year? ☐ Yes ☐ No
For assistance in calculating the TAB, please see the TAB Worksheet in Section 9 of the EQ Resource Guide.
If you answered "no" to question 9.3 and 9.4, please skip to Section 10.
9.5) Does the waste contain >10% water? ☐ Yes ☐ No
9.6) What is the TAB quantity for your facility? _____ Mg/Year
9.7) Does the waste contain >1.0 mg/kg total Benzene? ☐ Yes ☐ No
9.8) What is the total Benzene concentration in your waste? _____ Percent or _____ ppmw.
(Do not use TCLP analytical results. Acceptable laboratory methods include 8020, 8240, 8260, 602 and 624.)
*For a list of NAICS codes, please refer to Section 9 of the EQ Resource Guide.

Section 10 – Fuel Blending Information

10.1) Is this waste intended for fuel blending? ☐ Yes* ☒ No
*If yes, Heat value (BTU/lb.) _____ Chlorine (%) _____ Water (%) _____ Solids (%) _____
10.2) Is this waste intended for reclamation? ☐ Yes ☐ No (5-Gallon Sample required for all reclaim waste streams)

Section 11 – Constituent Information

Please identify your waste constituents from these four categories: ***Underlying Hazardous Constituents (UHC's), Volatile Organic Hazardous Air Pollutants (VOHAP's), Volatile Organic Compounds (VOC's) and Toxic Release Inventory Constituents (TRI)***

Constituent	Concentration	UHC?	Constituent	Concentration	UHC?
		☐ Yes ☐ No			☐ Yes ☐ No
		☐ Yes ☐ No			☐ Yes ☐ No
		☐ Yes ☐ No			☐ Yes ☐ No
		☐ Yes ☐ No			☐ Yes ☐ No
		☐ Yes ☐ No			☐ Yes ☐ No

Please see Section 11 of the EQ Resource Guide for a list of UHC's, VOHAP's and VOC's. For a complete list of TRI constituents, please refer to 40 CFR 372.65.

Section 12 – Certification

I certify that all information (including attachments) is complete and factual and is an accurate representation of the known and suspected hazards, pertaining to the waste described herein. I authorize EQ's Resource Team to add supplemental information to the waste approval file, provided I am contacted and give verbal permission. I authorize EQ's Resource Team to obtain a sample from any waste shipment for purposes of verification and confirmation. I agree that, if EQ approves the waste described herein, all such wastes that are transported, delivered, or tendered to EQ by Generator or on Generator's behalf shall be subject to, and Generator shall be bound by, the attached Standard Terms and Conditions.

Generator Signature Christopher M Bell Printed Name CHRISTOPHER M BELL

Company DOUBLE EAGLE STEEL Title ENVIRONMENTAL ENGINEER Date 8/25/05

The generator's signature MUST appear on the EQ Waste Characterization Report. If the generator has authorized a third party to certify this document, a written notice (on generator letterhead) must accompany this submittal. Although the EQ Resource Team is authorized to make certain modifications to the information provided on this form, the addition or removal of waste codes and waste constituents must be documented by the generator.

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Generator Approval Notification

May 31, 2005

Customer: EQ INDUSTRIAL SERVICES, INC.
Fax: (734) 547-2502

BOB ZAR
DOUBLE EAGLE
3000 MILLER ROAD
DEARBORN, MI 48120

This Generator Approval Notification acknowledges the acceptability of waste material(s) into the EQ environmental protection facility identified below and ensures that this facility has the appropriate permit(s) issued by federal and state regulatory agencies to properly transport, treat, and/or dispose of the waste material(s).

EQ FACILITY: Michigan Disposal Waste Treatment Plant (MID000724831)
49350 North I-94 Service Drive, Belleville, Michigan 48111

Approval Number: 070202MBF

Generator EPA ID: MID981092190 **Expires On:** 12/14/2005
Waste Common Name: CHROMIUM/SLUDGE FROM ALLOY/DEBRIS
Comments:

Primary Waste Code: D007

The Approval(s) listed above are based upon characterization information supplied to EQ by the Customer and the generator (if other than the Customer). The Customer is ultimately responsible for the accuracy and completeness of all such information, whether provided by the Customer or the generator. The Customer must notify the EQ Resource Team immediately upon knowledge of any changes to this information. This Approval and all wastes which are transported, delivered, or tendered to EQ under this Approval shall be subject to the attached Standard Terms and Conditions.

The Approval(s) will expire on the date(s) noted. Any new Approvals obtained from EQ on future business will be valid for a period of one (1) year from the date of issuance. Within 60 days of the Approval Expiration Date, you will be notified of the requirements for recertification.