UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

DEC 12 2016

CERTIFIED MAIL 7011 3500 0003 2064 3636
RETURN RECEIPT REQUESTED

Habersham Metal Products Company
ATTN: Mr. James A. Stapleton Jr., PE
264 Stapleton Road
P.O. Box 739
Cornelia, Georgia 30531-5643

Re: Notice of Violation and Opportunity to Show Cause Pursuant to Section 309 of the Clean Water Act (CWA), 33 U.S.C. § 1319, and Information Request Pursuant to Section 308 of the Clean Water Act (CWA), 33 U.S.C. § 1318, for Habersham Metal Products Company, Cornelia, Habersham County, Georgia.

Dear Mr. Stapleton:

On September 30, 2015, the U.S. Environmental Protection Agency Region 4 performed an industrial pretreatment reconnaissance inspection of Habersham Metal Products Company's facility (Facility) located at 264 Stapleton Road, Cornelia, Habersham County, Georgia. The purpose of the inspection was to evaluate Habersham Metal Products Company's compliance with the requirements of Sections 301 and 307(d) of the Clean Water Act (CWA), 33 U.S.C. §§ 1311 and 1317(d); the regulations promulgated thereunder at 40 C.F.R. Part 403; and the State of Georgia Rules for Water Quality Control, Chapter 391-3-6.

The EPA's inspection, as described in the inspection report enclosed herewith as Enclosure A, and subsequent investigative efforts have revealed that Habersham Metal Products Company failed to comply with Section 301 of the CWA, 33 U.S.C. § 1311, and its implementing pretreatment regulations at 40 C.F.R. Part 403 and the (State) State of Georgia Rules and Regulations for Water Quality Control, Chapter 391-3-6. Specifically, the EPA hereby notifies Habersham Metal Products Company, pursuant to Section 309(a) of the CWA, 33 U.S.C. § 1319(a), of the following findings of violations:

1. Significant industrial user discharge without a valid pretreatment permit.

   The Facility is a significant industrial user, as defined by 40 C.F.R. § 403.3(v). The Facility is therefore required to obtain a valid permit from the delegated pretreatment Control Authority, which is the State, prior to discharging to the City of Baldwin's publicly owned treatment works (POTW). See: State of Georgia Rule 391-3-6-.08; and 40 C.F.R. §§ 403.10(e) and 403.8(f)(1)(iii).

   The Facility has discharged to the POTW, which does not hold a State-approved pretreatment program. The facility has been discharging without a valid significant industrial user permit from the State for approximately 31 years, from 1985 to 2016.

2. New Source failure to install and operate pretreatment equipment prior to discharge.

   Pursuant to 40 C.F.R. § 403.6(b), the Facility is subject to the federal categorical pretreatment standards in 40 C.F.R. Part 433. The Facility is a new source, as defined in 40 C.F.R. § 403.3(m), because its regulated operations originated after the EPA published proposed standards for Part 433 on August 31, 1982. Habersham Metal Products Company was thus required to install, and have in operating condition, all the pollution control equipment necessary to meet applicable Pretreatment Standards, including those in 40 C.F.R. Part 433, prior to beginning discharge to the POTW.

   The Facility did not install such necessary pollution control equipment prior to beginning discharge of regulated wastewater to the POTW in 1985 and has not installed such equipment. Thus the Facility has continued to discharge to the POTW without the necessary pollution control equipment, in continuing violation of 40 C.F.R. § 403.6(b).

3. Failure to report/record initial compliance with categorical standards.

   Within 90 days after commencing a discharge to a POTW, a new source is required to report and maintain record of the self-monitoring information on its compliance with standards, per 40 C.F.R. §§ 403.12(d), 403.12(g), 403.12(l) and 403.12(o).

   Ninety days after commencing discharge to the POTW in 1985 the Facility did not submit a report to the State of its initial compliance with the pretreatment standards in 40 C.F.R. § 433.17. The Facility has also not maintained the required record demonstrating its initial compliance with these pretreatment standards.

4. Failure to submit periodic reports on continued compliance with categorical standards.

   Pursuant to 40 C.F.R. §§ 403.12(e), 403.12(g), 403.12(l) and 403.12(o), any industrial user subject to categorical pretreatment standards must submit to [Control Authority], and maintain its own records of, additional periodic compliance reports at least twice a year on its compliance with categorical standards and other information. From 1985 until the present, the Facility has not submitted to State, or maintained its own records of, self-monitoring reports of compliance with 40 C.F.R. § 433.17.

Until compliance with the CWA is achieved, Habersham Metal Products Company is considered to be in violation of the CWA and may be subject to enforcement action pursuant to Section 309 of the CWA, 33 U.S.C. § 1319. This section provides for the issuance of administrative penalty and/or compliance orders and the initiation of civil and/or criminal actions.

The EPA is continuing to investigate Habersham Metal Products Company's compliance with the CWA. Therefore, pursuant to Section 308 of the CWA, 33 U.S.C. § 1318, the EPA hereby requests that Habersham Metal Products Company provide the information set forth in Enclosure B within **twenty-one (21)** calendar days of your receipt of this letter.

Habersham Metal Products Company's response should be submitted to:

Attn: Ms. Connie Raines
U.S. Environmental Protection Agency, Region 4
NPDES Permitting and Enforcement Branch
Atlanta Federal Center
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

Failure to provide a full and complete response to this information request or to adequately justify a failure to respond within the time frame specified above may result in an EPA enforcement action pursuant to federal law, including, but not limited to Section 309 of the Clean Water Act, 33 U.S.C. § 1319, and 18 U.S.C. § 1001.

If Habersham Metal Products Company believes that any of the requested information constitutes confidential business information, it may assert a confidentiality claim with respect to such information, except for effluent data. Further details, including how to make a business confidentiality claim, are found in Enclosure C.

The EPA also requests that representatives of Habersham Metal Products Company contact the EPA within **seven (7) business days** of receipt of this letter to arrange a meeting in this office to show cause why the EPA should not take formal civil enforcement action against Habersham Metal Products Company for these violations and any other potential violations, including the assessment of appropriate civil penalties. In lieu of appearing in person, a telephone conference may be scheduled. Habersham Metal Products Company should be prepared to provide all relevant information with supporting documentation pertaining to the violations, including but not limited to any financial information which may reflect an inability to pay a penalty. Habersham Metal Products Company has the right to be represented by legal counsel.

All information submitted in response to this information request and/or during the show cause meeting must be accompanied by the following certification that is signed by a duly authorized official in accordance with 40 C.F.R. § 403.12(l):

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

Please be aware that the EPA may use information provided during the meeting or telephone conference and/or in response to this information request in any enforcement proceeding related to this matter. Failure to schedule a show cause meeting may result in a unilateral enforcement action against Habersham Metal Products Company. Notwithstanding the scheduling of a show cause meeting, the EPA retains the right to bring further enforcement action under Section 309 of the CWA, 33 U.S.C. § 1319, for the violations cited therein or for any other violation of the CWA.

In addition, the Securities and Exchange Commission (Commission) requires its registrants to periodically disclose environmental legal proceedings in statements filed with the Commission. To assist Habersham Metal Products Company, the EPA has also enclosed a document entitled *Notice of Securities and Exchange Commission Registrants' Duty to Disclose Environmental Legal Proceedings*.

Please contact Ms. Connie Raines at (404) 562-9671 to arrange a show cause meeting or if you have any questions or concerns. Legal inquiries should be directed to Ms. Carol Baschon, Attorney Advisor, at (404) 562-9528.

Sincerely,

James D. Giattina
Director
Water Protection Division

Enclosures

cc: Mr. Bert Langley
Georgia Environmental Protection Division

Final Report

Habersham Metal Products Company

Industrial User Pretreatment Reconnaissance Inspection

September 30, 2015

Prepared for:

EPA Region 4

61 Forsyth Street, S.W.

Atlanta, GA 30303-8960

Prepared by:

PG Environmental, LLC

607 10th Street; Suite 307

Golden, CO 80401-5817

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I. Introduction

On September 30, 2015, PG Environmental, LLC (hereinafter, PG) conducted a pretreatment reconnaissance inspection of the Habersham Metal Products Company facility (hereinafter, Habersham or facility) on behalf of the U.S. Environmental Protection Agency (EPA) Region 4. The facility's location and mailing address are the same: 264 Stapleton Road; Cornelia, GA 30531. The facility does not have an industrial user discharge permit from either the State of Georgia Environmental Protection Division (State of Georgia) or the City of Baldwin; however, publicly available information about the facility suggested a potential need for coverage under a control mechanism. The State of Georgia was notified in advance of the pretreatment reconnaissance inspection activity pursuant to its Memorandum of Agreement with the EPA.

The facility is located in a rural area within Habersham County and consists of two large warehouse facilities and an administrative office building. The facility is located at latitude and longitude 34.501549 and -83.556888, respectively.

II. Entry

On behalf of EPA Region 4, PG Inspector, Ms. Kettie Holland, arrived at the facility at 1:56 P.M. and informed the facility's administrative staff of the reason for her visit and the purpose of the inspection. She asked whom the appropriate person would be to meet with to discuss facility operations and potential wastewater generating operations. Ms. Holland then met with Mr. Jim Stapleton, the Director of Research and Development Testing, and Mr. Ronald Lewallen, the Safety and Operations Support Specialist (jointly referred to as facility representatives). Introductions were exchanged and Ms. Holland provided a preliminary explanation of the purpose of the inspection.

III. Opening Conference

The facility representatives and Ms. Holland proceeded to Mr. Stapleton's office on the upper level of the administrative building. Ms. Holland presented her inspection credentials and provided a full explanation of the purpose and intent of the reconnaissance compliance inspection. Ms. Holland requested that the facility representatives provide a description of the facility's onsite operations and wastewater generating processes. The facility representatives explained that the company began operations at the facility in 1974, and that the facility's 120,000 square-foot production area was added between 1985 and 1986, which the facility representatives term the "Annex Building."

The facility representatives continued to explain the facility's operations and process flow from raw materials to finished product. The facility representatives stated that the facility receives sheet metal and conducts sheering, punching, bending, welding, washing, and painting of the sheet metal to produce various strengths and designs of hollow doors, metal frames, and detention wall panel systems. The facility representatives further explained that the facility conducts a metal washing operation of the metal frames prior to spray applying a solvent-based primer, "Kem-Kromik" to the frames. The facility generates and discharges untreated wastewater

from its metal frame washing operation to the City of Baldwin's (City's) publicly owned treatment works (POTW). The facility representatives stated that air compressor condensate is also generated and pretreated using an oil and water separator prior to discharging the wastewater to the City's POTW.

During initial discussions with the facility representatives regarding the facility's processes and permits, Mr. Stapleton provided Ms. Holland with a binder used for maintaining material safety data sheets (MSDS) for the various chemicals used in the metal frame washing process. Mr. Stapleton also mentioned that the facility has a storm water permit and an air permit issued by the State of Georgia in addition to a storm water pollution prevention plan.

Mr. Stapleton stated that the facility does not hold any federal, state, or local government wastewater discharge permits. He also mentioned that in the past, the facility had received visits from Aaron Akemon, the Wastewater Treatment Plant Manager from the City of Baldwin Wastewater Treatment Plant (WWTP). The facility representatives explained that Mr. Akemon had visited the facility approximately 6 months to a year prior to this inspection in an effort to determine the source of detergents that may have attributed to foaming at the WWTP.

IV. Tour of Operations

Ms. Holland accompanied the facility representatives on the inspection of the facility's process area, which takes place in the Annex Building and Process Warehouse on the property. The facility representatives stated that there are no plans for facility expansions or significant changes in processes in the near future.

Annex Building

The facility representatives explained that raw materials within the Annex Building consist of different types of mild and stainless steel sheet metal. The facility representatives explained that the process area is primarily utilized as a research and development (R&D) area where experimental processes using bullet-proof, sound-proof, and hurricane-resistant materials are tested for use in final products utilized in detention and high-security facilities. The facility representatives mentioned that approximately 90 percent of their work is to support government entities on the local, state, and federal levels.

The facility representatives stated that a portion of the process area is also used to process slider tracks and panels for housing, typically used in detention facilities. The panels used in this process may either be stacked and shipped or assembled and shipped to the customer. Panel manufacturing also takes place in the main Process Warehouse of the facility. The facility representatives also stated that a separate part of the process area is used for machining intricate parts that go into the doors. This area of the facility also housed a spray booth used for wet painting operations. The facility representatives explained that floor drains were not located within the spray booth, which was confirmed by Ms. Holland's observations.

Process Warehouse

The facility representatives explained that the majority of the metal cutting, bending, and welding takes place in this area of the facility. The Process Warehouse is further divided into two process areas: one for door and panel manufacturing and the other for metal frame manufacturing.

Door and Panel Manufacturing

The facility representatives and Ms. Holland began the inspection of the process area at the door and panel manufacturing area of the facility. The facility utilizes a TruLaser 3030 for cutting the sheet metal to produce the initial shape of the product. The facility then utilizes a GIGAbend bending machine to bend the metal to the desired shape for the panels prior to assembly, welding, and further process operations. The facility employees then weld the cut sheet metal and the bent metal pieces together to form a "stiffener", which is a necessary part for the door and panel products manufactured at the facility.

The facility representatives explained that they also utilize a number of robot welders to weld the seams between the cut sheet metal and the bent metal pieces. The part then goes through what the facility representatives refer to as a "finishing process." During this process, the rough edges of the part are grinded and smoothed to remove oils and impurities. Parts of the door or panel are then covered with cardboard to prevent specific parts of the door from being painted, per desired specifications. The door and panel parts are then hung on overhead hooks and are introduced to the painting booth. In the painting booth, a PC105 prime coat is applied to the products used in detention facilities. The painted parts are then introduced to an oven where the paint dries on the product. The final product is then packaged on the line and is loaded on a trailer for shipping to the specific customer.

Within the central area of the Process Warehouse is what the facility representatives refer to as the "parts department." This area of the facility contains a punching machine which is used to produce the internal parts of the doors, frames, and panels manufactured at the facility. The parts department primarily utilizes an Amada punching machine for manufacturing the internal parts at the facility.

Metal Frame Manufacturing

The facility representatives explained that near the central area of the process warehouse was the "dividing line" where the steel frame production process begins and is separated from the door and panel production area. The steel sheet metal is introduced to a punching machine where the "pocket frame" is produced by cutting out the jam frame where the hinges will be applied. After the punching process, the metal goes through a bending process which is performed using one of six brake presses. The metal is bent into a specific shape depending upon the engineered plan for the frame. The seams of the frame are then spot welded to reinforce the closures for the final product. The facility representatives stated that the facility takes the semi-assembled frames, hangs them on overhead hooks, and sends them through the metal frame washing process prior to applying the Kem-Kromik paint to the frame.

The facility representatives explained that after the frame has been attached to an overhead hook and crane system, which is mechanically operated, it is introduced into the first dip tank, which the facility representatives term "tank #1." This tank contains the HOUGHTO-CLEAN 8150 solution which contains hexylene glycol and sodium carbonate and has a capacity of 3,500 gallons (refer to Attachment 1, Photograph 1). The facility representatives explained that the solution has a concentration of between 3.0 to 4.5 percent of the HOUGHTO-CLEAN 8150 chemical and is to be maintained at a temperature range between 145 and 160 degrees Fahrenheit. The frame is dipped into the tank for a duration of approximately four minutes prior to being moved to the second stage of the five-stage frame washing process (refer to Attachment 1, Photograph 2).

The facility representatives explained that after the metal frame has been dipped in tank #1, it is moved to the first rinse process in which the frame is suspended in the first stage rinse cell (refer to Attachment 1, Photograph 3). The cell is equipped with a number of spray nozzles that sprays the frame with pressurized City water. The wastewater generated from the rinse process is collected in the bottom of the cell and drains to the lower-level area under the tanks, which was designed as a secondary containment structure for the tanks. The rinse wastewater is pumped to the facility's sewer connection, which discharges to the POTW.

The facility representatives explained that the rinse tanks are operated by a foot pump. Specifically, once a frame has been suspended in the cell, the foot pump is pressed and the pressurized water is sprayed onto the metal frame, rinsing off residual product from the tank #1 dip process. The facility representatives explained that when the foot pump is activated, it causes pressurized water to discharge from the nozzles for 20 seconds. The facility representatives explained that the facility receives water from the City, pressurizes the water, and stores it in a tank with a capacity of approximately 400 gallons.

The facility representatives explained that the two spray-rinse stages of the rinse process functioned as dip rinse tanks at an unidentified time in the past. Specifically, instead of spray applying the rinse water used in the second and fourth stage of the process, the facility dipped the metal frames into rinse tanks. The facility representatives stated that when the facility had dip rinse tanks, they would discharge the wastewater from the tanks to an equalization tank and ultimately to the POTW at a rate of approximately 2 gallons per minute (gpm). The facility representatives stated that in the past, a representative of the POTW and facility representatives discovered that the dip rinse tank process allowed zinc to accumulate within the rinse tanks, which was then discharged to the POTW. The City requested that the facility modify its process so that the zinc would not accumulate and be discharged to the POTW. In response to this request, the facility representatives stated that the dip rinse tanks were removed and the spray application rinse system was installed.

The facility representatives explained that during the third stage of the wash process, the metal frame is dipped into what the facility representatives refer to as "tank #3." This tank has a capacity of 3,500 gallons and contains a solution with a range of 1.25 to 3.25 percent of the HOUGHTO-PREP ZP-3 chemical solution (refer to Attachment 1, Photograph 4). The chemical used in the solution contains inorganic fluoride, nitric acid, and phosphoric acid, according to the

chemical MSDS. The facility representatives explained that the solution is to be maintained at a temperature range between 110 and 130 degrees Fahrenheit. The frame is to be dipped into the tank for a duration of approximately two minutes prior to being moved to the fourth stage of the five-stage wash process (refer to Attachment 1, Photograph 5).

The facility representatives explained that the fourth stage of the five-stage wash process involves another rinse cycle, similar to that of the second stage of the process. Again, pressurized water provided by the City from the 400-gallon tank is activated by a foot pump and is spray-applied to the metal frame to rinse the residual HOUGHTO-PREP ZP-3 chemical solution from the metal. As with the second stage of the wash, the rinse water from the process drains from the bottom of the cell to the lower-level area of the facility where it is pumped to the facility's sewer connection and discharged to the POTW (refer to Attachment 1, Photograph 6).

The facility representatives explained that during the final stage of the five-stage metal washing process, the metal frame is dipped into what they refer to as "tank #5." This tank has a capacity of 3,500 gallons and contains the HOUGHTO-LuPREP 601 chemical solution, which contains the alkaline solvent triethanolamine (TEOA) (refer to Attachment 1, Photograph 7). The facility representatives explained that approximately 16 ounces of the chemical must be added to the tank every two weeks. The solution is to be maintained at a temperature range between 125 and 140 degrees Fahrenheit and the metal frame is to be dipped into the tank for the duration of approximately 30 seconds (refer to Attachment 1, Photograph 8). After the frame has been removed from tank #5 it is allowed to dry. The frames then go through a finishing process, similar to that of the doors and panels, in which the edges of the frames are grinded and an auto body filler may be applied and removed. The frames are then hung and introduced to a spray booth where they are spray painted. The frames are allowed to dry and are packaged and shipped to various customers.

The facility representatives mentioned that the facility employees conduct tests of the dip tanks to ensure that they are of the quality needed to properly wash the metal frames. The facility employee conducts a total alkalinity titration test for tank #1 and a ZP3 titration test for tank #3. The facility employee records the temperature for tank #5. The facility maintains a "cleaning tank data sheet" and also records the percent concentration according to the titration test, pH, and temperature of the tank (refer to Attachment 1, Photograph 9).

As a component of the inspection, Ms. Holland requested to inspect the lower-level secondary containment area where the wastewater from the rinsing process is collected and pumped to the POTW. Ms. Holland and the facility representatives did not walk through the area due to the significant accumulation of rinse water on the ground of the lower-level area (refer to Attachment 1, Photograph 10). The facility representatives explained that the drains within the rinse cells are hard-piped to a pump with a catch filter and are then pumped to a 55-gallon drum that collects wastewater. The wastewater is then pumped from the drum and discharged to the facility's sewer connection.

Ms. Holland inspected the 55-gallon drum from an overhead view and asked additional questions regarding the drum, pump, and wastewater collected on the floor. After further investigation, the

facility representatives stated that the wastewater was no longer pumped from the 55-gallon drum to the sewer connection but instead was pumped directly from the rinse cells to the facility's sewer connection. Mr. Lewallen explained that the wastewater collected on the floor of the secondary containment area was due to a pump. He went on to explain that the wastewater was pumped utilizing a pump with a catch filter, which was missing a gasket, thus causing the wastewater to leak from the pump and collect within the secondary containment area of the facility (refer to Attachment 1, Photographs 10 and 11). After the pump with the catch filter, the wastewater is pumped via hard-pipe to the facility's sewer connection, located outdoor of the Process Warehouse building (refer to Attachment 1, Photograph 12). Ms. Holland did not observe any flow monitoring equipment for the discharge pipe.

Ms. Holland noted that a holding tank was located outside, in the near vicinity of the facility's sewer connection. The facility representatives explained that the holding tank was once used to store wastewater when the facility had rinse dip tanks. Wastewater collected in the holding tank would be discharged to the City's POTW at a rate of approximately 2 gpm. The facility representatives stated that the tank is no longer utilized and that they plan to remove it from the facility.

Remaining Process Areas

The facility representatives and Ms. Holland continued with the inspection throughout the remaining areas of the facility. The facility representatives pointed out the facility's oil and water separator used to pretreat the condensate from the facility's air compressor, located within a building separate from the other process areas. The facility representatives explained that the oil and water separator is a two-stage separator and that air compressor condensate flows from the first stage (located at the east) to the second stage, and to the facility's sewer connection which discharges to the City's POTW (refer to Attachment 1, Photographs 13 through 15). The facility representatives removed the covers to the two-stage oil and water separator.

The facility representatives explained that the hazardous waste storage area was covered and located outside on a concrete pad. Ms. Holland observed that the hazardous waste collected within the area mainly consisted of 5-gallon buckets of Pro-cryl, an acrylic primer and waste oil (refer to Attachment 1, Photograph 16).

The facility representatives also explained that an area of the facility was once used for truck washing. The facility representatives explained that truck washing hadn't occurred at the facility in a long time and that the area was now used for staging and truck loading.

V. Records Review

During the opening conference, Ms. Holland requested to review and obtain copies of the MSDSs for the chemicals used in the metal frame washing process. The following documents were provided to Ms. Holland by the facility representatives:

- MSDS

- Tank #1—HOUGHTO-CLEAN 8150 (active components: hexylene glycol and sodium carbonate)
- Tank #3—HOUGHTO-PREP ZP-3 (active components: inorganic fluoride, nitric acid, and phosphoric acid)
- Tank #5—LuPREP 601 (active components: Triethanolamine)

- Analytical Environmental Services, Inc. analytical report for samples collected on April 17, 2014 from tank #1, tank #3, and tank #5.
- Facility's City of Baldwin sewer/water bills for May, June, and July 2015.
- Non-hazardous waste manifest/certificate of disposal dated June 11, 2012.

The facility representatives explained that approximately once every three months a representative from the chemical provider, Houghton Chemicals visits the facility and tests the solution within the dip tanks. According to the test results, Houghton notifies the facility representatives if more chemicals need to be added to the dip tanks or if they need to be diluted with water. The facility representatives stated that, in the past, they did not use Houghton Chemicals and had to have the dip tank solutions hauled offsite by Environmental Remedies, LLC on a more frequent basis. Since the facility switched to Houghton Chemicals in 2012, the dip tank solutions haven't needed to be hauled offsite as often. According to the documents provided by the facility representatives, the facility has not contracted with a company to haul the content of the dip tanks offsite since June 2012.

Ms. Holland asked if there were any other records for a more recent hauling event for the solution dip tanks or if the facility had discharged the solution to the sewer. The facility representatives responded that the hauling records provided were the most recent and that they had not discharged the content from the chemical dip tanks to the POTW. Ms. Holland requested that in the event that the facility discovered additional waste hauling and disposal records for the dip tanks that they provide her with these documents via email.

After the onsite inspection, the facility representative provided the following documents to Ms. Holland per her request:

- Non-hazardous waste manifest/certificate of disposal dated March 12, 2010.
- Non-hazardous waste manifest/certificate of disposal dated March 24, 2010.
- Non-hazardous waste manifest/certificate of disposal dated May 17, 2010.
- Non-hazardous waste manifest/certificate of disposal dated July 27, 2010.
- Non-hazardous waste manifest/certificate of disposal December 29, 2010.

VI. Closing Conference

After the inspection of the process and operation areas, the facility representatives and Ms. Holland returned to the office where the opening conference had occurred. Ms. Holland explained that the facility did generate and discharge wastewater to the POTW and may need to receive a permit from the State of Georgia. Ms. Holland mentioned that any final compliance determinations would be communicated by the EPA to the facility.

VII. Findings

A. The facility generates and discharges wastewater associated with the metal frame washing process and air compressor condensate to the City's POTW. Since the facility utilizes a phosphoric acid solution to chemically etch the metal prior to painting, it performs categorical operations generating wastewater that is discharged to the POTW and is thus subject to the federal regulations at 40 C.F.R Part 433, Metal Finishing. In addition, the facility performs several ancillary operations listed at 40 C.F.R § 433.10(a), including metal welding, bending, and grinding, although these ancillary operations do not generate wastewater.

   In addition to the metal finishing standards, the pretreatment standards and requirements identified in 40 C.F.R Part 403, General Pretreatment Regulations for Existing and New Sources of Pollution, also apply to the facility's non-domestic discharges to the public sewer. Upon discharge to the POTW, the facility did not: (1) previously install the pretreatment necessary to meet standards pursuant to 40 C.F.R. § 403.6(b); (2) submit to the State of Georgia (its pretreatment control authority) the initial and routine reporting for categorical users pursuant to 40 C.F.R. § 403.12; and (3) obtain a significant industrial user permit from the State of Georgia pursuant to law.

B. Ms. Holland observed a hazardous waste drum stored in the Annex Building, which was used for the collection of paint thinner. The drum was labeled as containing hazardous waste and was not stored in the vicinity of a floor drain.

C. The housekeeping in the area housing the frame metal washing process was in need of improvement. Wastewater from the rinse cells was observed accumulated on the floor of the secondary containment area, which housed various debris including abandoned pipes and other miscellaneous equipment.

D. Ms. Holland observed that the tests recorded in the cleaning tank data sheet appeared to be conducted on a daily basis (excluding weekends) according to the information recorded on the data sheet. However, Ms. Holland noted that, for the later portion of August, the dates were recorded as follows: August 19, 28, 21, 24, 25, and 26. It was unclear why the sequence of the dates were inconsistent and not recorded in chronological order. Ms. Holland also noted that the majority of the information recorded on the data sheet was identical to the information recorded on the previous day. However, the temperature for tank #1 appeared to range between 150 and 170 degrees Fahrenheit.

E. During the inspection of the two-stage oil and water separator located outside of the compressor building, Ms. Holland observed that a dark oil sheen on the surface of the wastewater collected in the first stage of the oil and water separator. Ms. Holland also observed floating solids and absorbent material applied to the wastewater within the second stage of the oil and water separator.

F. During the review of the non-hazardous waste hauling records, the most recent hauling event occurred on June 11, 2012. Prior to this hauling event, the facility provided documentation that the dip tanks had been collected and hauled from the facility on a frequency from twice per month to once every five months. Although the facility representatives stated that their recent switch to Houghton Chemicals has resulted in the baths not requiring change-out as frequently. The documentation providing the frequency at which the tanks are being hauled offsite is of concern.

G. During the inspection of the metal frame washing process, Ms. Holland and Mr. Lewallen had a discussion regarding the amount of wastewater generated and discharged from the rinse stages of the process. Ms. Holland and Mr. Lewallen estimated that approximately 40 gallons of water were used for the two rinse cycles, and that approximately 40 frames would be washed in a day, providing an estimate of approximately 1,600 gallons of wastewater generated from the process per day, meaning that approximately 32,000 gallons of wastewater would be generated and discharged to the POTW from the process per month. This estimation does not include domestic wastewater discharges or discharges from the air compressor condensate.

VIII. Recommendations

A. Due to the activities that are subject to regulation, it is strongly recommended that the facility take the appropriate steps to ensure that it has received an industrial user permit before continuing to discharge its wastewater to the City's POTW. Specifically, it is recommended that the facility continue to work closely with the City and to contact the State of Georgia's Environmental Protection Division to obtain the proper permits for the facility's operations and associated discharges. The facility should improve tracking of its dip tank hauling events.

B. It is recommended that the facility repair the leaking pump gasket at the metal frame rinse process area and ensure that other aspects of the system are properly operating to ensure proper housekeeping and wastewater management at the facility. It is also recommended that the facility regularly service the oil and water separators on the property to ensure that wastewater is not discharged from the facility of a quality that may have a negative impact on the operation of the POTW.

C. It is recommended that the facility obtain and correctly install a flow measurement device to identify the volume of wastewater generated and discharged from its regulated categorical wastewater operations prior to the introduction of any diluting wastestreams. It is also recommended that the facility work with the State of Georgia's Environmental Protection Division to determine the necessity of installing an effluent pH meter or other measurement devices to ensure that the wastewater does not cause harm to the POTW or cause pass

through, interference, and/or upsets at the treatment facility or in any other way cause the City to violate its own discharge permit.

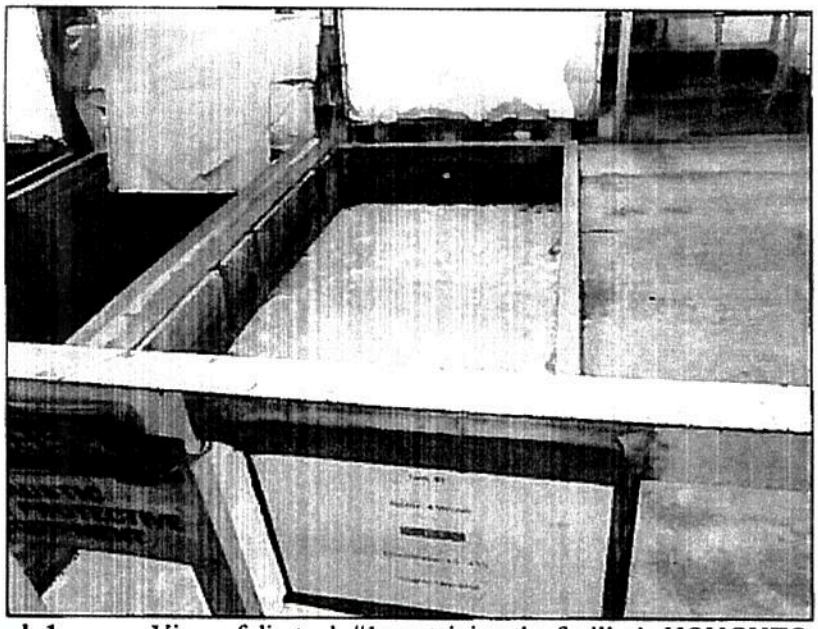
IX. Attachments

Attachment 1	Habersham Metal Products Co. Photograph Log
Attachment 2	MSDSs for Dip Tanks
Attachment 3	Analytical Results from Dip Tank Testing
Attachment 4	Non-hazardous Waste Hauling and Disposal Manifests

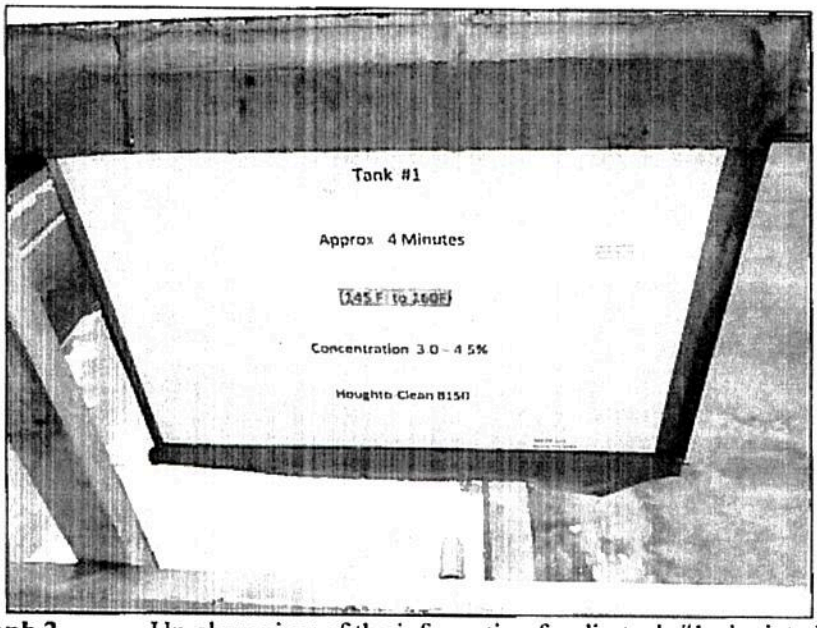
Attachment 1

Habersham Metal Products Company

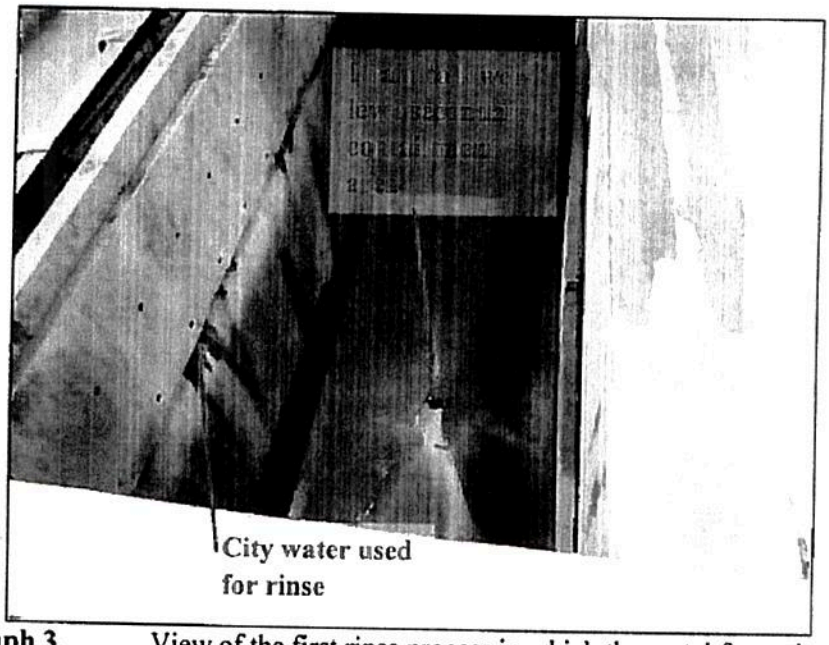
Photograph Log



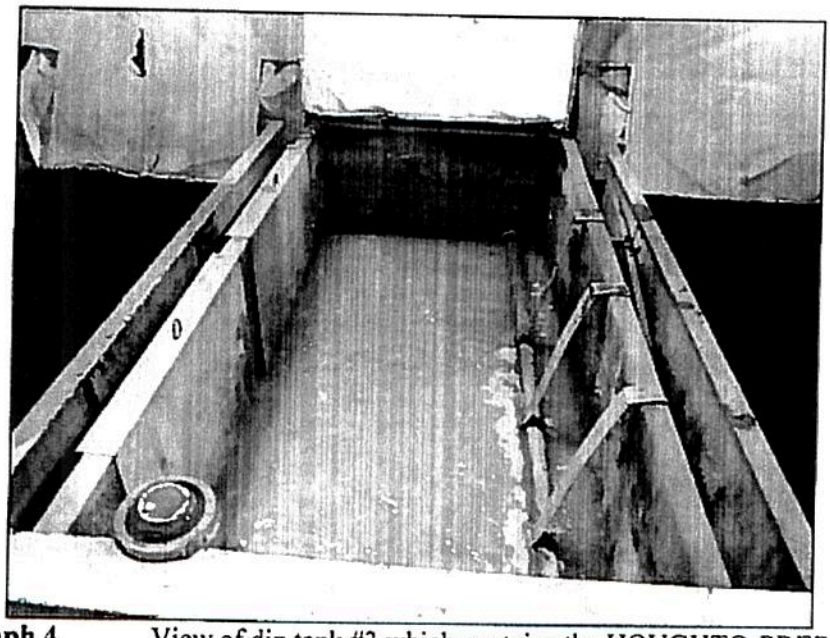
Photograph 1. View of dip tank #1 containing the facility's HOUGHTO-CLEAN 8150 solution.



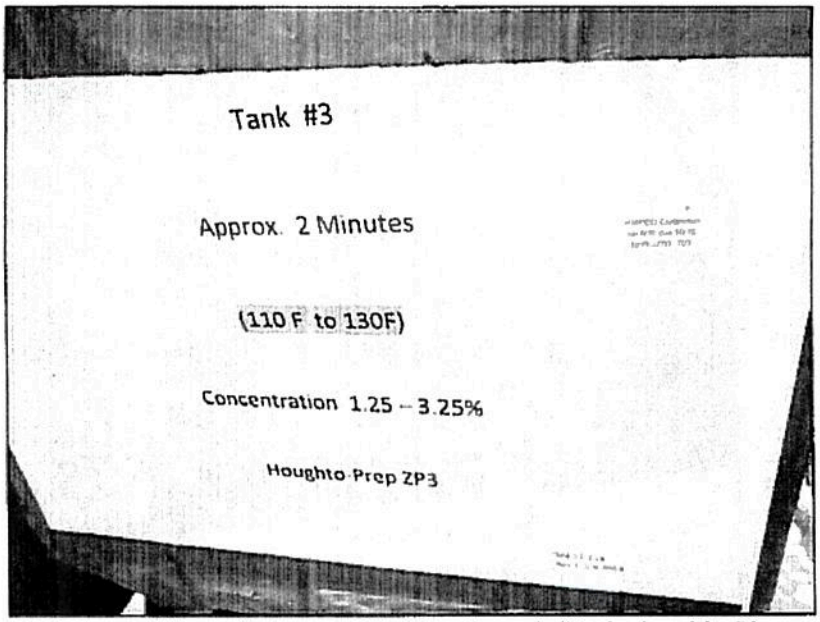
Photograph 2. Up-close view of the information for dip tank #1, depicted in Photograph 1, above.



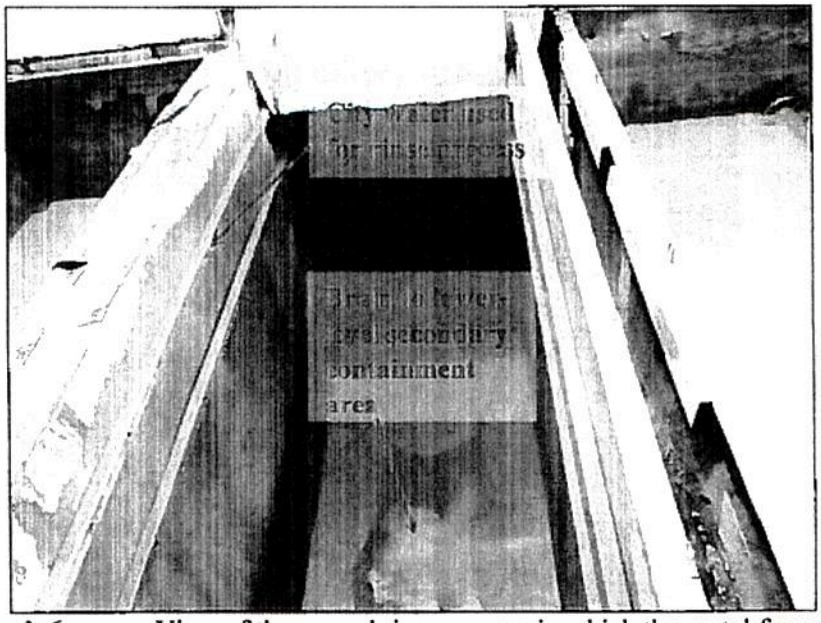
Photograph 3. View of the first rinse process in which the metal frame is suspended in the cell and spray-rinsed with water provided by the City. Wastewater generated from this process drains from the bottom of the tank and is ultimately pumped and discharged to the POTW.



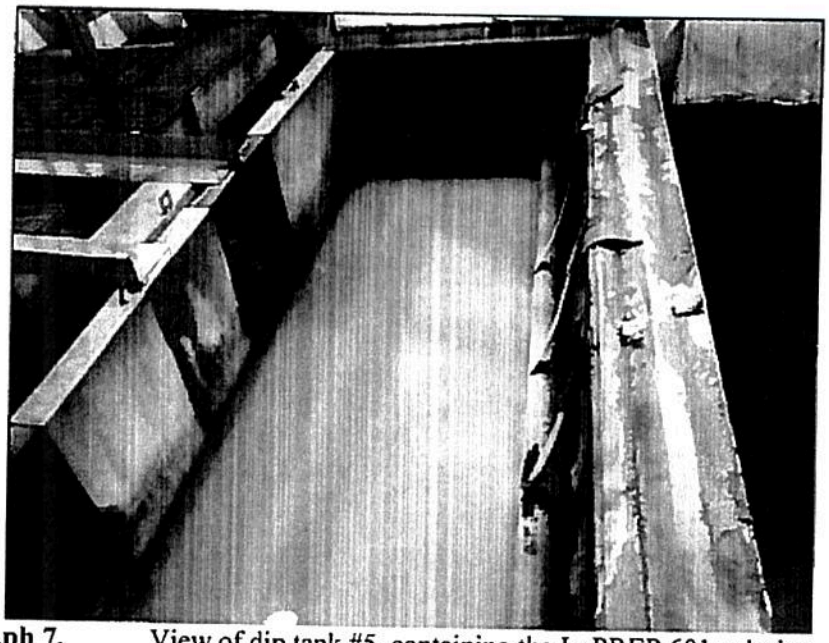
Photograph 4. View of dip tank #3 which contains the HOUGHTO-PREP ZP-3 solution (containing inorganic fluoride, nitric acid, and phosphoric acid).



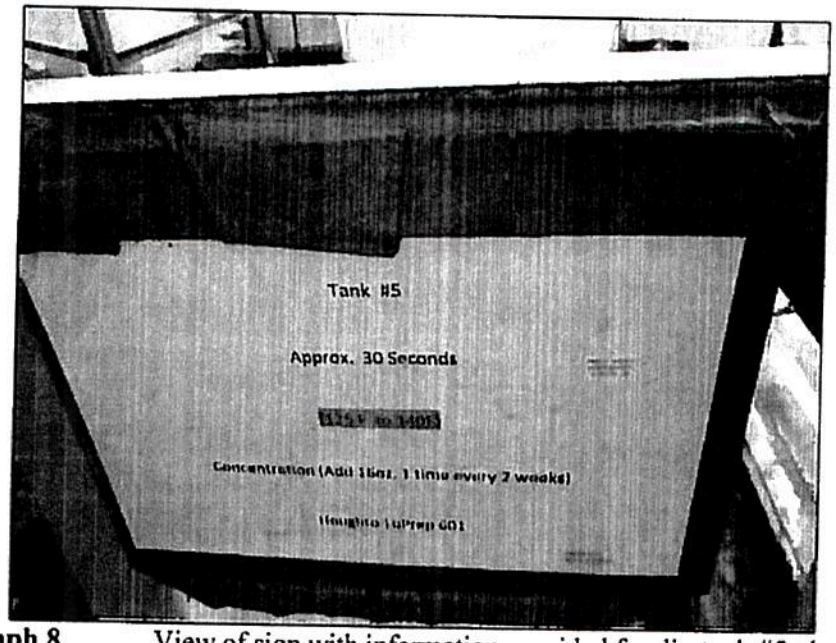
Photograph 5. View of sign provided for dip tank #3, depicted in Photograph 4, above.



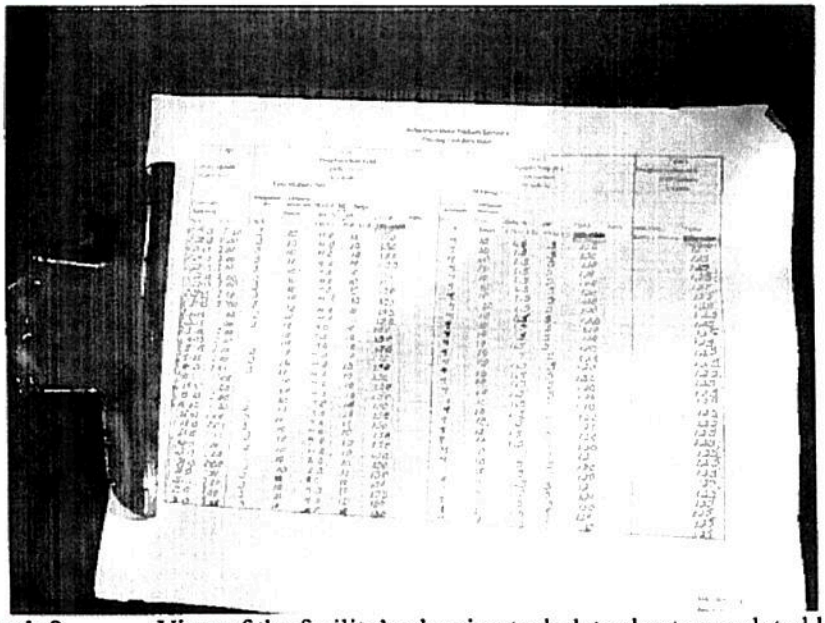
Photograph 6. View of the second rinse process in which the metal frame is again suspended above the ground, within the cell and spray-rinsed with water provided by the City. Wastewater generated from this process drains from the bottom of the tank and is ultimately pumped and discharged to the POTW.



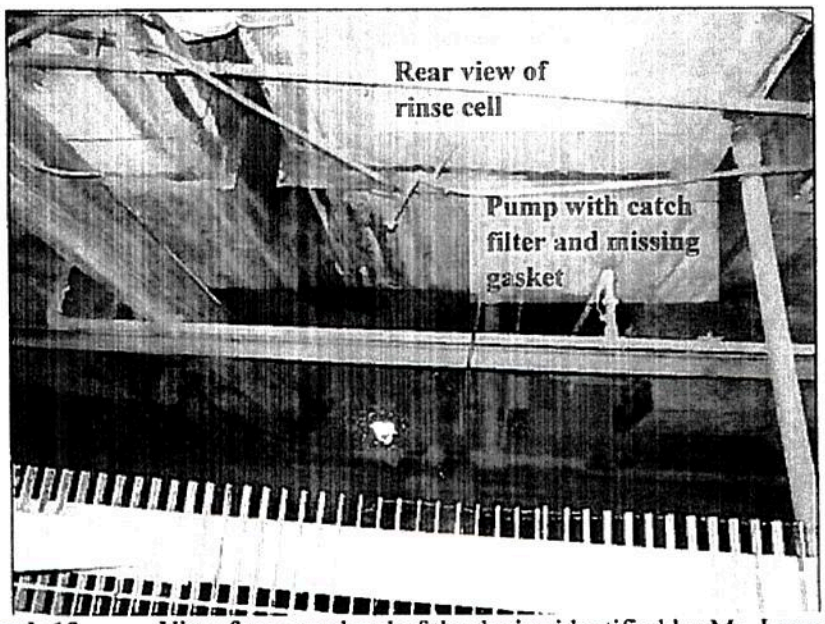
Photograph 7. View of dip tank #5, containing the LuPREP 601 solution (containing triethanolamine). This is the final stage of the metal frame washing process.



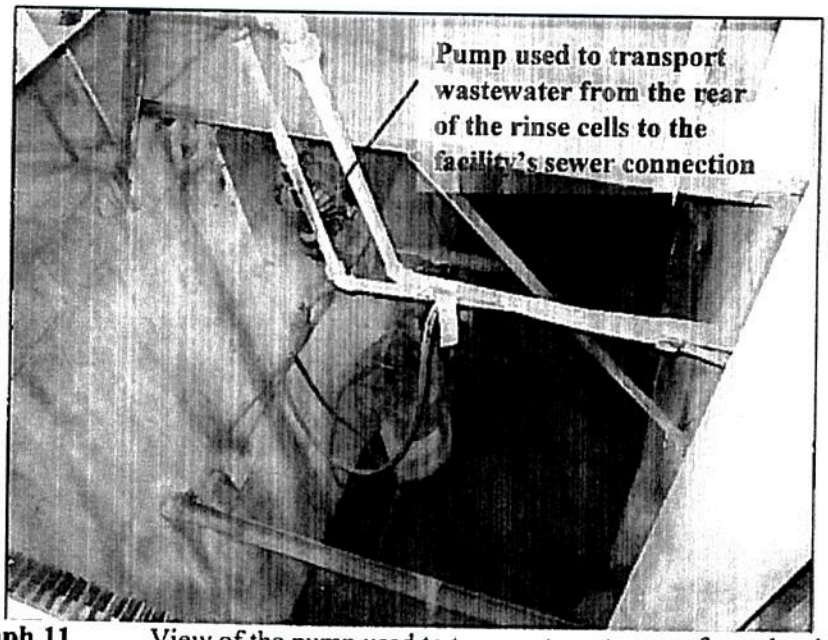
Photograph 8. View of sign with information provided for dip tank #5, depicted in Photograph 7, above.



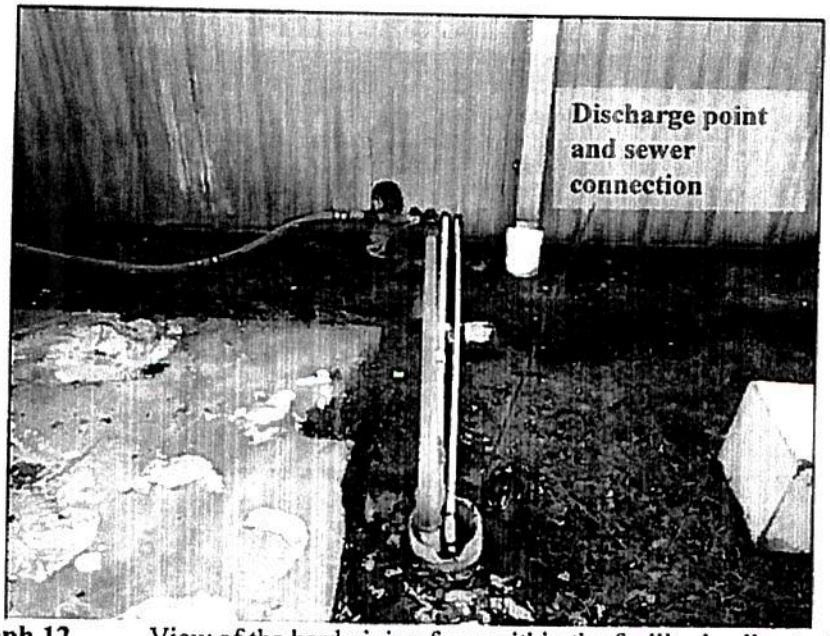
Photograph 9. View of the facility's cleaning tank data sheet completed by a facility employee.



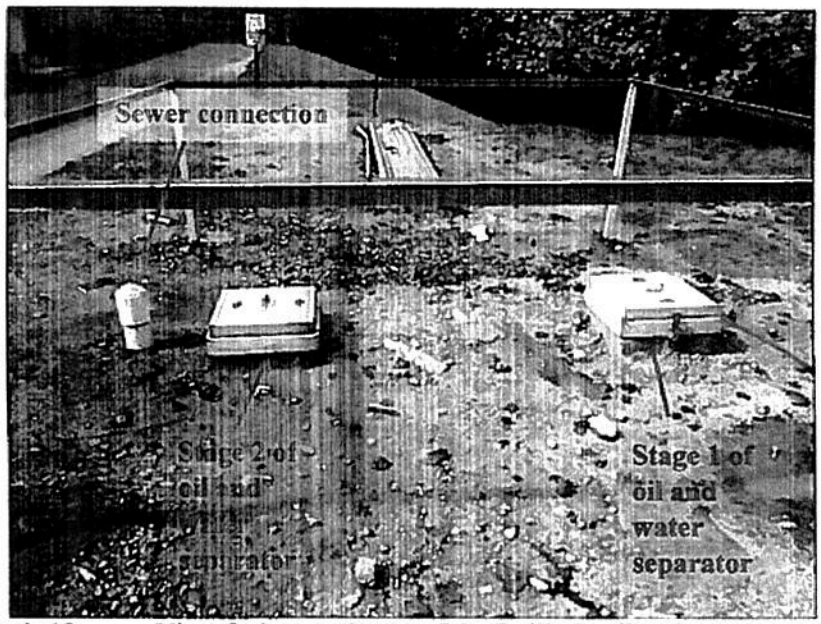
Photograph 10. View from overhead of the device identified by Mr. Lewallen as the pump with a catch filter that was missing a gasket, causing wastewater to leak and collect on the floor of the secondary containment sump.



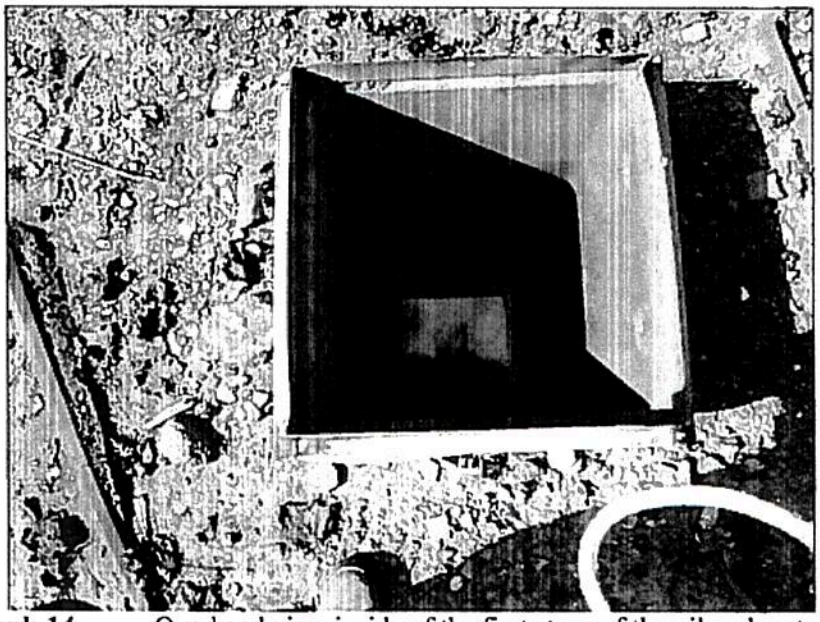
Photograph 11. View of the pump used to transport wastewater from the rinse cells to the facility's sewer connection.



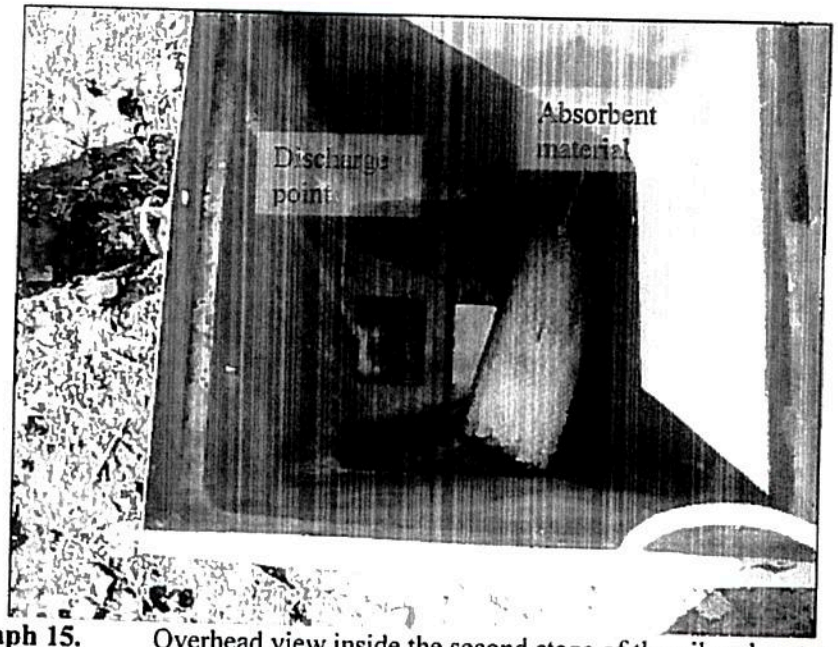
Photograph 12. View of the hard piping from within the facility leading to the facility's sewer connection and ultimately, to the City POTW.



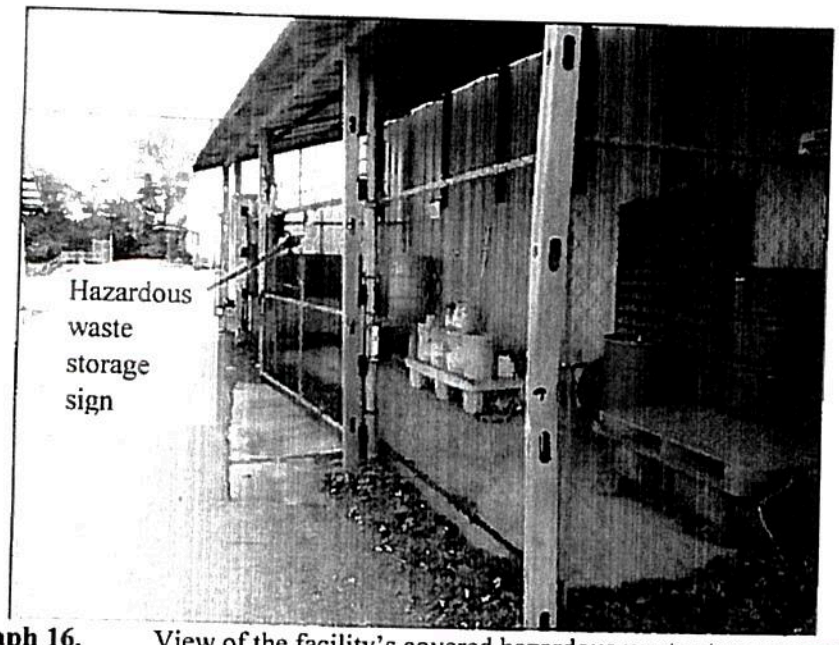
Photograph 13. View facing northwest of the facility's oil and water separator located to the northwest of the building housing the facility's compressor and to the east of the facility's Process Warehouse.



Photograph 14. Overhead view inside of the first stage of the oil and water separator.



Photograph 15. Overhead view inside the second stage of the oil and water separator. Note the absorbent material applied inside the second stage of the separator.



Photograph 16. View of the facility's covered hazardous waste storage area located outdoors of the facility to the northwest of the process warehouse.

Document Log

Habersham metal Products Company

Attachment 2

Habersham Metal Products Company

MSDSs for Dip Tanks

Tank #1 H
10025 9/30/15

Houghton International Inc.

Revision Date : 04/25/2011

Material Safety Data Sheet
HOUGHTO-CLEAN 8150

1. Chemical Product and Company Identification

Product Name	HOUGHTO-CLEAN 8150	Emergency Phone Number - Canada	24 HOUR - 613-996-6666 (CANUTEC)
Company Name	Houghton International Inc. Madison & Van Buren Aves Valley Forge, PA 19482	CHEMTREC Company Code	HOUH
Company Name	Houghton Canada Inc. 115 Walker Drive, Unit B Brampton, ON L6T 5P5 Phone: 905-494-3770	CHEMTREC Customer Number	10769
Website	www.houghtonintl.com	FAX	(610) 666-1376
Telephone	(610) 666-4000	Customer Service	(888) 459-9844
Emergency Phone Number	24 HOUR - (800) 424-9300 (CHEMTREC)		

HABERSHAM METAL PRODUCTS CO.
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2. Hazardous Ingredients

Component	Cas No	% by Weight	Hazards
Hexylene Glycol	107-41-5	1-5	TLV: 25 ppm - ceiling PEL: N/E
Sodium Carbonate	497-19-8	1-5	TLV: 10 mg/m³ - dust PEL: 15 mg/m³ - dust

N/E - Not Established; N/A - Not Applicable; Mfr - Manufacturer Recommendation

3. Hazards Identification

Primary Entry Routes	EYES, SKIN, INHALATION
Acute Effects	
Inhalation	INHALATION OF MISTS MAY CAUSE IRRITATION OF THE UPPER RESPIRATORY TRACT.
Eye	MAY CAUSE MILD TO MODERATE EYE IRRITATION.
Skin	MAY CAUSE MODERATE SKIN IRRITATION ON PROLONGED CONTACT IF SKIN IS SENSITIVE.
Ingestion	INGESTION MAY CAUSE IRRITATION OF MOUTH, THROAT AND STOMACH. ASPIRATION MAY CAUSE LUNG DAMAGE.

Continued on Next Page

Habersham

3. Hazards Identification - continued

Carcinogenicity	THIS PRODUCT DOES NOT CONTAIN ANY COMPONENT REPORTABLE AS A CARCINOGEN UNDER 29 CFR 1910.1200.
Medical Conditions Aggravated by LongTerm Exposure	PRE-EXISTING SKIN AND RESPIRATORY CONDITIONS MAY BE AGGRAVATED BY EXPOSURE.
Chronic Effects	UNKNOWN
HMIS:	
Health	1
Flammability	0
Physical Hazard	0

* Indicates that there may be chronic health effects present

4. First Aid Measures

Inhalation	IF INHALED, REMOVE TO A SOURCE OF FRESH AIR.
Eye Contact	IMMEDIATELY FLUSH EYES WITH WATER FOR 15 MINUTES. GET IMMEDIATE MEDICAL ATTENTION.
Skin Contact	WASH SKIN THOROUGHLY WITH SOAP AND WATER. REMOVE CONTAMINATED CLOTHING AND LAUNDER BEFORE REUSING. CONSULT PHYSICIAN IF IRRITATION PERSISTS.
Ingestion	IF INGESTED, DO NOT INDUCE VOMITING. GIVE WATER OR MILK TO DILUTE. CONTACT PHYSICIAN IMMEDIATELY.
Note to Physicians	NO SPECIFIC ANTIDOTE KNOWN. BASED ON INDIVIDUAL REACTIONS OF THE PATIENT, THE PHYSICIAN'S JUDGMENT SHOULD BE USED TO CONTROL SYMPTOMS AND CLINICAL CONDITIONS.

N/A - Not Applicable

5. Fire Fighting Measures

Flash Point	N/A - PRODUCT CONTAINS WATER.
Autoignition Temperature	N/D
LEL	N/D

Continued on Next Page

5. Fire Fighting Measures - continued

UEL	N/D
Extinguishing Media	PRODUCT CONTAINS WATER. IF WATER IS REMOVED, USE CARBON DIOXIDE, DRY CHEMICAL OR FOAM.
Unusual Fire or Explosion Hazards	PRODUCT IS ALKALINE. WEAR PROTECTIVE GEAR DURING FIREFIGHTING.
Fire Fighting Instructions	WEAR SELF-CONTAINED BREATHING APPARATUS IN CONFINED AREAS.
NFPA:	
Health	1
Flammability	0
Reactivity	0
Special	N/A

N/A - Not Applicable; N/D - Not Determined; > - Greater Than; < - Less Than

6. Accidental Release Measures

Spill or Release Procedures	DILUTE WITH WATER, NEUTRALIZE TO PH 7 WITH DILUTE ACID AND MOP UP THOROUGHLY TO AVOID RESIDUAL SLIPPERINESS.

7. Handling and Storage

Handling Precautions	AVOID CONTACT WITH EYES, SKIN AND CLOTHING. KEEP FROM FREEZING. WASH THOROUGHLY AFTER HANDLING.
Storage Requirements	DO NOT STORE NEAR STRONG ACIDS. KEEP CONTAINERS CLOSED WHEN NOT IN USE. DO NOT USE ZINC OR BRASS BUNGS AND FITTINGS. EMPTY CONTAINERS MAY CONTAIN HAZARDOUS VAPORS AND RESIDUE AND THEREFORE RETAIN ALL HAZARDS.

8. Exposure Controls/Personal Protection

Engineering Controls	PROVIDE GENERAL AND/OR LOCAL EXHAUST VENTILATION TO MINIMIZE AIRBORNE CONCENTRATIONS AND REDUCE EXPOSURE.
Personal Protective Equipment	

Continued on Next Page

8. Exposure Controls/Personal Protection - continued

Eye/Face Protection	WEAR SAFETY GOGGLES OR SAFETY GLASSES WITH SIDE SHIELDS.
Skin Protection	USE RUBBER GLOVES AND PROTECTIVE CLOTHING TO MINIMIZE SKIN CONTACT.
Respiratory Protection	RESPIRATORY PROTECTION NORMALLY NOT REQUIRED. RECOMMENDED IN MISTING CONDITIONS.
Other	EYEWASH AND SAFETY SHOWER RECOMMENDED.

Comments: Never eat, drink, or smoke in work areas. Practice good personal hygiene after using this material, especially before eating, drinking, smoking, or applying cosmetics.

9. Physical and Chemical Properties

Appearance	CLEAR PALE STRAW LIQUID	Water Solubility	COMPLETE
Odor	SLIGHT ALKALINE ODOR	Boiling Point	215°F / 102°C
Vapor Pressure (mmHg)	AS WATER	Freezing/ Melting Point	N/D
Vapor Density (Air = 1)	AS WATER	Evaporation Rate (BuAc = 1)	AS WATER
Specific Gravity (Water = 1)	1.10		
pH (Neat)	11.2		
pH (Dilution)			
At Percent	2		
pH	10.7		

N/D - Not Determined; N/A - Not Applicable; > - Greater Than; < - Less Than

10. Stability and Reactivity

Stability	THIS PRODUCT IS STABLE AT ROOM TEMPERATURE IN CLOSED CONTAINERS UNDER NORMAL STORAGE AND HANDLING CONDITIONS.
Conditions to Avoid	KEEP FROM FREEZING.
Chemical Incompatibilities	AVOID CONTACT WITH STRONG OXIDIZERS.

Continued on Next Page

10. Stability and Reactivity - continued

Hazardous Decomposition Products	THERMAL: OXIDES OF CARBON
Hazardous Polymerization	HAZARDOUS POLYMERIZATION WILL NOT OCCUR.

11. Toxicological Information

NO DATA AVAILABLE

12. Ecological Information

NO DATA AVAILABLE

13. Disposal Considerations

Disposal	FOLLOW PERTINENT REGULATIONS FOR DISPOSAL. IT IS THE RESPONSIBILITY OF THE PRODUCT USER TO DETERMINE, AT THE TIME OF DISPOSAL, WHETHER A MATERIAL CONTAINING THE PRODUCT OR DERIVED FROM THE PRODUCT SHOULD BE CLASSIFIED AS A HAZARDOUS WASTE. (40 CFR 261.20-24)
RCRA Hazardous Waste Number	D002 (CORROSIVITY)

14. Transportation Information

Proper Shipping Name	NOT HAZARDOUS UNDER DOT, AIR OR IMO REGULATIONS.
TDG	NOT REGULATED UNDER THE CANADIAN TRANSPORTATION OF DANGEROUS GOODS REGULATION.

15. Regulatory Information

TSCA Section 8(b)	ALL OF THE COMPONENTS IN THIS PRODUCT ARE ON THE TSCA INVENTORY.
DSL	ALL OF THE COMPONENTS IN THIS PRODUCT ARE ON THE CANADIAN DSL. THIS PRODUCT HAS BEEN CLASSIFIED IN ACCORDANCE WITH THE HAZARD CRITERIA OF THE CPR AND THE MSDS CONTAINS ALL OF THE INFORMATION REQUIRED BY THE CPR.

Continued on Next Page

15. Regulatory Information - continued

CERCLA Reportable Quantity	NONE
SARA Title III, Section 313	THIS PRODUCT CONTAINS NO TOXIC CHEMICAL SUBJECT TO THE REPORTING REQUIREMENTS OF SECTION 313 OF TITLE III OF THE SUPERFUND AMENDMENTS AND REAUTHORIZATION ACT OF 1986 AND 40 CFR PART 372.
SCAQMD	THIS PRODUCT CAN BE USED WITH NO RESTRICTIONS IN CALIFORNIA'S SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT'S UNDER RULE 1144.
Ozone Depleting Substances	THIS PRODUCT WAS NOT MANUFACTURED, DOES NOT CONTAIN, AND WAS NOT PACKAGED USING ANY CLASS I OR CLASS II OZONE DEPLETING SUBSTANCE AS DEFINED BY THE CLEAN AIR ACT.
WHMIS	D2B

16. Other Information

Prepared By	GARY CARL
Title	MANAGER, PRODUCT SAFETY

Disclaimer: The information presented herein has been compiled from sources considered to be dependable and is accurate as of the date issued. However, since data, safety standards, and government regulations are subject to change and the conditions of handling and use are beyond our control, Houghton International makes no warranty regarding the accuracy of such data or its suitability for any purchaser's use or for any consequence of its use. The data in this MSDS relates only to the specific material designated herein and does not relate to use in combination with any other material or in any process. Safe handling and use remains the responsibility of the purchaser and the purchaser has the sole responsibility to determine the suitability of the materials for any use and the manner of use contemplated. Houghton International assumes no responsibility for injury to the recipient or to third persons or for any damage to any property and the recipient assumes all such risks.

10026 Tank #3 KCH 9/30/11

Houghton International Inc.

Revision Date : 08/21/2009

Material Safety Data Sheet
HOUGHTO-PREP ZP-3

1. Chemical Product and Company Identification

Product Name	HOUGHTO-PREP ZP-3	Emergency Phone Number	24 HOUR - (800) 424-9300 (CHEMTREC)
Company Name	Houghton Metal Finishing 1055 Windward Ridge Suite 140 Alpharetta, GA 30005	FAX	770-753-4902
		Customer Service	800-638-8819
Website	www.houghtonintl.com		
Telephone	770-753-4892		

2. Hazardous Ingredients

Component	Cas No	% by Weight	Hazards
Inorganic Fluoride	proprietary	< 1	TLV: 2.5 mg/m³ as F PEL: 2.5 mg/m³ as F
Nitric Acid	7697-37-2	< 1	TLV: 2 ppm PEL: 2 ppm STEL: 4 ppm Other:
Phosphoric Acid	7664-38-2	<1	TLV: 1 mg/m³ PEL: 1 mg/m³ STEL: 3 mg/m³ Other:

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CORNELIA, GA

N/E - Not Established; N/A - Not Applicable; Mfr - Manufacturer Recommendation

3. Hazards Identification

Primary Entry Routes	EYES, SKIN, INHALATION
Acute Effects	
Inhalation	AVOID BREATHING MISTS OF PRODUCT AND/OR DILUTIONS, WHICH MAY CAUSE IRRITATION OF UPPER RESPIRATORY TRACT.
Eye	MAY CAUSE SEVERE EYE IRRITATION OR CHEMICAL BURNS. MAY CAUSE PERMENANT DAMAGE.
Skin	MAY CAUSE SEVERE SKIN IRRITATION OR CHEMICAL BURNS. BLISTERING MAY OCCUR.
Ingestion	INGESTION MAY CAUSE SEVERE IRRITATION OR CORROSIVE BURNS TO MOUTH, THROAT AND DIGESTIVE TRACT.

Continued on Next Page

Habersham

3. Hazards Identification - continued

Carcinogenicity	THIS PRODUCT DOES NOT CONTAIN ANY COMPONENT REPORTABLE AS A CARCINOGEN UNDER 29 CFR 1910.1200.
Medical Conditions Aggravated by LongTerm Exposure	PRE-EXISTING SKIN AND RESPIRATORY CONDITIONS MAY BE AGGRAVATED BY EXPOSURE
Chronic Effects	UNKNOWN
HMIS:	
Health	3
Flammability	0
Physical Hazard	0

* Indicates that there may be chronic health effects present

4. First Aid Measures

Inhalation	IF INHALED, REMOVE TO A SOURCE OF FRESH AIR.
Eye Contact	IMMEDIATELY FLUSH EYES WITH WATER FOR 15 MINUTES. GET IMMEDIATE MEDICAL ATTENTION.
Skin Contact	FLUSH SKIN WITH LARGE AMOUNTS OF WATER. REMOVE CONTAMINATED CLOTHING AND LAUNDER BEFORE REUSING. CONSULT PHYSICIAN IF IRRITATION PERSISTS.
Ingestion	IF INGESTED, DO NOT INDUCE VOMITING. RINSE MOUTH AND THROAT WITH WATER. GIVE WATER, MILK OR MILK OF MAGNESIA. CONSULT PHYSICIAN.
Note to Physicians	NO SPECIFIC ANTIDOTE KNOWN. BASED ON INDIVIDUAL REACTIONS OF THE PATIENT, THE PHYSICIAN'S JUDGMENT SHOULD BE USED TO CONTROL SYMPTOMS AND CLINICAL CONDITIONS.

N/A - Not Applicable

5. Fire Fighting Measures

Flash Point	N/A - PRODUCT CONTAINS WATER.
Autoignition Temperature	N/D
LEL	N/A

Continued on Next Page

5. Fire Fighting Measures - continued

UEL	N/A
Extinguishing Media	USE MEDIA APPROPRIATE FOR SURROUNDING FIRES.
Unusual Fire or Explosion Hazards	CAUTION! PRODUCT IS HIGHLY ACIDIC. WEAR PROTECTIVE GEAR IF SPILLED DURING A FIRE.
Fire Fighting Instructions	USE WATER TO KEEP FIRE-EXPOSED CONTAINERS COOL. WEAR PROTECTIVE GEAR DURING FIREFIGHTING.
NFPA:	
Health	3
Flammability	0
Reactivity	0
Special	COR

N/A - Not Applicable; ND - Not Determined; > - Greater Than; < - Less Than

6. Accidental Release Measures

Spill or Release Procedures	WEAR APPROPRIATE PERSONAL PROTECTIVE EQUIPMENT. NEUTRALIZE SPILL WITH SODA ASH OR DILUTE ALKALI, DILUTE WITH WATER AND MOP UP THOROUGHLY.

7. Handling and Storage

Handling Precautions	CAUTION! PRODUCT IS ACIDIC. WEAR RECOMMENDED PROTECTIVE EQUIPMENT. AVOID CONTACT WITH EYES, SKIN AND CLOTHING. USE WITH ADEQUATE VENTILATION. WASH THOROUGHLY AFTER HANDLING.
Storage Requirements	STORE AWAY FROM STRONG ALKALI. KEEP CONTAINERS CLOSED WHEN NOT IN USE. EMPTY CONTAINERS MAY CONTAIN HAZARDOUS VAPORS AND RESIDUE AND THEREFORE RETAIN ALL HAZARDS.

8. Exposure Controls/Personal Protection

Engineering Controls	PROVIDE GENERAL AND/OR LOCAL EXHAUST VENTILATION TO MAINTAIN AIRBORNE CONCENTRATIONS BELOW THE EXPOSURE LIMITS IN SECTION 2.
Personal Protective Equipment	

Continued on Next Page

8. Exposure Controls/Personal Protection - continued

Eye/Face Protection	WEAR SAFETY GOGGLES OR FULL FACE SHIELD.
Skin Protection	USE RUBBER GLOVES AND LONG SLEEVES TO MINIMIZE SKIN EXPOSURE. USE APRON OR OVERALLS IF SPLASHING IS POSSIBLE.
Respiratory Protection	RESPIRATORY PROTECTION REQUIRED IF APPLICABLE EXPOSURE LIMITS ARE EXCEEDED. RECOMMENDED IN MISTING CONDITIONS.
Other	EYEWASH AND SAFETY SHOWER RECOMMENDED.

Comments: Never eat, drink, or smoke in work areas. Practice good personal hygiene after using this material, especially before eating, drinking, smoking, or applying cosmetics.

9. Physical and Chemical Properties

Appearance	CLEAR, AMBER LIQUID	Water Solubility	COMPLETE
Odor	SLIGHT ACIDIC ODOR	Boiling Point	215°F / 102°C
Vapor Pressure (mmHg)	N/D	Evaporation Rate (BuAc = 1)	< 1
Vapor Density (Air = 1)	N/D		
Specific Gravity (Water = 1)	1.01		
pH (Neat)	1.8		
pH (Dilution)			
At Percent	2		
pH	2.4		

N/D - Not Determined; N/A - Not Applicable; > - Greater Than; < - Less Than

10. Stability and Reactivity

Stability	THIS PRODUCT IS STABLE AT ROOM TEMPERATURE IN CLOSED CONTAINERS UNDER NORMAL STORAGE AND HANDLING CONDITIONS.
Chemical Incompatibilities	STRONG OXIDIZERS AND ALKALIES
Hazardous Decomposition Products	OXIDES OF NITROGEN AND PHOSPHORUS.

Continued on Next Page

10. Stability and Reactivity - continued

Hazardous Polymerization	HAZARDOUS POLYMERIZATION WILL NOT OCCUR.

11. Toxicological Information

NO DATA AVAILABLE

12. Ecological Information

NO DATA AVAILABLE

13. Disposal Considerations

Disposal	FOLLOW PERTINENT REGULATIONS FOR DISPOSAL. IT IS THE RESPONSIBILITY OF THE PRODUCT USER TO DETERMINE, AT THE TIME OF DISPOSAL, WHETHER A MATERIAL CONTAINING THE PRODUCT OR DERIVED FROM THE PRODUCT SHOULD BE CLASSIFIED AS A HAZARDOUS WASTE. (40 CFR 261.20-24)
RCRA Hazardous Waste Number	D002 (CORROSIVITY)

14. Transportation Information

Proper Shipping Name	REFER TO BILL OF LADING OR CONTACT HOUGHTON METAL FINISHING CO.

15. Regulatory Information

TSCA Section 8(b)	ALL OF THE COMPONENTS IN THIS PRODUCT ARE ON THE TSCA INVENTORY.
DSL	ALL OF THE COMPONENTS IN THIS PRODUCT ARE IN COMPLIANCE WITH THE CANADIAN DSL.
CERCLA Reportable Quantity	NONE
SARA Title III, Section 313	THIS PRODUCT CONTAINS NO TOXIC CHEMICAL SUBJECT TO THE REPORTING REQUIREMENTS OF SECTION 313 OF TITLE III OF THE SUPERFUND AMENDMENTS AND REAUTHORIZATION ACT OF 1986 AND 40 CFR PART 372.

Continued on Next Page

15. Regulatory Information - continued

Ozone Depleting Substances	THIS PRODUCT WAS NOT MANUFACTURED, DOES NOT CONTAIN, AND WAS NOT PACKAGED USING ANY CLASS I OR CLASS II OZONE DEPLETING SUBSTANCE AS DEFINED BY THE CLEAN AIR ACT.
WHMIS	E

16. Other Information

Prepared By	GARY CARL
Title	MANAGER, PRODUCT SAFETY

Disclaimer: The information presented herein has been compiled from sources considered to be dependable and is accurate as of the date issued. However, since data, safety standards, and government regulations are subject to change and the conditions of handling and use are beyond our control, Houghton International makes no warranty regarding the accuracy of such data or its suitability for any purchaser's use or for any consequence of its use. The data in this MSDS relates only to the specific material designated herein and does not relate to use in combination with any other material or in any process. Safe handling and use remains the responsibility of the purchaser and the purchaser has the sole responsibility to determine the suitability of the materials for any use and the manner of use contemplated. Houghton International assumes no responsibility for injury to the recipient or to third persons or for any damage to any property and the recipient assumes all such risks.

10027 Tank #5 RCH 9/30/11

Houghton International Inc.

Revision Date : 09/01/2004

Material Safety Data Sheet
LuPREP 601

1. Chemical Product and Company Identification

Product Name	LuPREP 601	Emergency Phone Number	24 HOUR - (800) 424-9300 (CHEMTREC)
Company Name	Houghton International Inc. Madison & Van Buren Aves Valley Forge, PA 19482	FAX	(610) 666-1376
Website	www.houghtonintl.com	Customer Service	(888) 459-9844
Telephone	(610) 666-4000		

2. Hazardous Ingredients

Component	Cas No	% by Weight	Hazards
Triethanolamine	102-71-6	1-10	TLV: 5 mg/m³ PEL: N/E STEL: N/E Other: N/E

N/E - Not Established; N/A - Not Applicable; M/r - Manufacturer Recommendation

3. Hazards Identification

Primary Entry Routes	EYES, SKIN, INHALATION
Acute Effects	
Inhalation	MISTS MAY IRRITATE UPPER RESPIRATORY TRACT.
Eye	MAY CAUSE IRRITATION.
Skin	MAY CAUSE IRRITATION ON PROLONGED CONTACT.
Ingestion	NO SIGNIFICANT EFFECTS KNOWN.
Carcinogenicity	NO COMPONENT KNOWN TO BE PRESENT IN THIS PRODUCT AT GREATER THAN 0.1% IS LISTED AS A CARCINOGEN BY IARC, NTP OR OSHA.
Medical Conditions Aggravated by LongTerm Exposure	PRE-EXISTING SKIN AND RESPIRATORY CONDITIONS MAY BE AGGRAVATED BY EXPOSURE.
Chronic Effects	UNKNOWN
HMIS:	

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Continued on Next Page

Habersham

3. Hazards Identification - continued

Health	1
Flammability	0
Reactivity	0

* Indicates that there may be chronic health effects present

4. First Aid Measures

Inhalation	REMOVE TO SOURCE OF FRESH AIR.
Eye Contact	FLUSH WITH WATER 15 MINUTES; CONSULT PHYSICIAN.
Skin Contact	WASH WITH SOAP AND WATER. REMOVE CONTAMINATED CLOTHING AND LAUNDER BEFORE REUSING.
Ingestion	GIVE WATER OR MILK. INDUCE VOMITING. CONSULT PHYSICIAN.
Note to Physicians	NO SPECIFIC ANTIDOTE KNOWN. BASED ON INDIVIDUAL REACTIONS OF THE PATIENT, THE PHYSICIAN'S JUDGMENT SHOULD BE USED TO CONTROL SYMPTOMS AND CLINICAL CONDITIONS.

N/A - Not Applicable

5. Fire Fighting Measures

Flash Point	N/A - PRODUCT CONTAINS WATER
Autoignition Temperature	N/D
LEL	N/D
UEL	N/D
Extinguishing Media	N/A USE APPROPRIATE MEDIA FOR SURROUNDING FIRES.
Unusual Fire or Explosion Hazards	NONE.
Fire Fighting Instructions	IF WATER IS REMOVED, USE CARBON DIOXIDE, FOAM, OR DRY CHEMICAL.
NFPA:	
Health	1
Flammability	0

Continued on Next Page

5. Fire Fighting Measures - continued

Reactivity	0
Special	N/A

N/A - Not Applicable; ND - Not Determined; > - Greater Than; < - Less Than

6. Accidental Release Measures

Spill or Release Procedures	WEAR GOGGLES AND GLOVES. DILUTE WITH WATER AND NEUTRALIZE WITH DILUTE ACID. MOP UP THOROUGHLY TO AVOID RESIDUAL SLIPPERINESS.

7. Handling and Storage

Storage and Handling Requirements	KEEP AWAY FROM STRONG OXIDIZERS. AVOID CONTACT WITH EYES, SKIN AND CLOTHING. WASH THOROUGHLY AFTER HANDLING. USE WITH ADEQUATE VENTILATION. KEEP CONTAINERS CLOSED WHEN NOT IN USE.

8. Exposure Controls/Personal Protection

Engineering Controls	GENERAL VENTILATION IS ADEQUATE.
Personal Protective Equipment	
Eye/Face Protection	SAFETY GOGGLES OR SAFETY GLASSES WITH SIDE SHIELDS.
Skin Protection	RUBBER GLOVES IF SKIN IS SENSITIVE.
Respiratory Protection	REQUIRED IF EXPOSURE LIMITS IN SECTION 2 ARE EXCEEDED.
Other	EYE BATH AND SAFETY SHOWER RECOMMENDED.

Comments: Never eat, drink, or smoke in work areas. Practice good personal hygiene after using this material, especially before eating, drinking, smoking, or applying cosmetics.

9. Physical and Chemical Properties

Appearance	CLEAR, WATER-WHITE LIQUID; NO ODOR	Water Solubility	COMPLETE
		Boiling Point	215° F

Continued on Next Page

9. Physical and Chemical Properties - continued

Vapor Pressure (mmHg)	AS WATER	Freezing/ Melting Point	N/D
Vapor Density (Air = 1)	AS WATER	Evaporation Rate (BuAc = 1)	AS WATER
Specific Gravity (Water = 1)	1.054		
pH (Neat)	10.3		
pH (Dilution)			
At Percent	2		
pH	9.5		

N/D - Not Determined; N/A - Not Applicable; > - Greater Than; < - Less Than

10. Stability and Reactivity

Stability	THIS PRODUCT IS STABLE AT ROOM TEMPERATURE IN CLOSED CONTAINERS UNDER NORMAL STORAGE AND HANDLING CONDITIONS.
Chemical Incompatibilities	STRONG OXIDIZERS
Hazardous Decomposition Products	THERMAL; OXIDES OR CARBON AND NITROGEN
Hazardous Polymerization	HAZARDOUS POLYMERIZATION WILL NOT OCCUR.

11. Toxicological Information

NO DATA AVAILABLE

12. Ecological Information

NO DATA AVAILABLE

Continued on Next Page

13. Disposal Considerations

Disposal	FOLLOW PERTINENT REGULATIONS FOR DISPOSAL. IT IS THE RESPONSIBILITY OF THE PRODUCT USER TO DETERMINE, AT THE TIME OF DISPOSAL, WHETHER A MATERIAL CONTAINING THE PRODUCT OR DERIVED FROM THE PRODUCT SHOULD BE CLASSIFIED AS A HAZARDOUS WASTE. (40 CFR 261.20-24)
RCRA Hazardous Waste Number	N/A

14. Transportation Information

Proper Shipping Name	NOT HAZARDOUS UNDER DOT, AIR, OR IMO REGULATIONS.

15. Regulatory Information

TSCA Section 8(b)	ALL OF THE COMPONENTS IN THIS PRODUCT ARE ON THE TSCA INVENTORY.
CERCLA Reportable Quantity	NONE
SARA Title III, Section 313	THIS PRODUCT CONTAINS NO TOXIC CHEMICAL SUBJECT TO THE REPORTING REQUIREMENTS OF SECTION 313 OF TITLE III OF THE SUPERFUND AMENDMENTS AND REAUTHORIZATION ACT OF 1986 AND 40 CFR PART 372.
Ozone Depleting Substances	THIS PRODUCT WAS NOT MANUFACTURED, DOES NOT CONTAIN, AND WAS NOT PACKAGED USING ANY CLASS I OR CLASS II OZONE DEPLETING SUBSTANCE AS DEFINED BY THE CLEAN AIR ACT.

16. Other Information

Prepared By	GARY CARL
Title	MANAGER, PRODUCT SAFETY

Disclaimer: The information presented herein has been compiled from sources considered to be dependable and is accurate as of the date issued. However, since data, safety standards, and government regulations are subject to change and the conditions of handling and use are beyond our control, Houghton International makes no warranty regarding the accuracy of such data or its suitability for any purchaser/s use or for any consequence of its use. The data in this MSDS relates only to the specific material designated herein and does not relate to use in combination with any other material or in any process. Safe handling and use remains the responsibility of the purchaser and the purchaser has the sole responsibility to determine the suitability of the materials for any use and the manner of use contemplated. Houghton International assumes no responsibility for injury to the recipient or to third persons or for any damage to any property and the recipient assumes all such risks.

Attachment 3

Habersham Metal Products Company

Analytical Results for Dip Tanks

AES

ANALYTICAL ENVIRONMENTAL SERVICES, INC.

April 25, 2014

Richard Brimley
Hepaco, Inc.
3645 Oakcliff Rd
Doraville GA 30340

TEL: (770) 934-1180
FAX: (770) 621-0238

RE: Habersham Tank #1

Dear Richard Brimley: Order No: 1404I63

Analytical Environmental Services, Inc. received 1 samples on 4/17/2014 1:35:00 PM for the analyses presented in following report.

No problems were encountered during the analyses. Additionally, all results for the associated Quality Control samples were within EPA and/or AES established limits. Any discrepancies associated with the analyses contained herein will be noted and submitted in the form of a project Case Narrative.
AES' certifications are as follows:
-NELAC/Florida Certification number E87582 for analysis of Environmental Water, soil/hazardous waste, and Drinking Water Microbiology, effective 07/01/13-06/30/14.
-AIHA-LAP, LLC Laboratory ID: 100671 for Industrial Hygiene samples (Organics, Inorganics), Environmental Lead (Paint, Soil, Dust Wipes, Air), and Environmental Microbiology (Fungal) effective until 09/01/15.

These results relate only to the items tested. This report may only be reproduced in full.

If you have any questions regarding these test results, please feel free to call.

James Forrest
Project Manager

5080 Peachtree Industrial Drive • Atlanta, Georgia 30340 • Tel: 770.457.8177 • Fax: 770.457.8188 • Toll Free: 800.972.4889
www.aesatlanta.com

#6

1404I63.

HEPACO

Serious experience for serious times.

Date: 4.17.14 Sample Time: 10:00 PO#: 61-00001 Project#: 999.000 Sample ID: Habersham Tank #1

Matrix: Water Number of Business Days Turn Around: ~~(5)~~ (2) (Same Day) authorization required

	Sb	As	Ba	Be	Cd	Cr	Cu	Pb	Hg	Ni	PO4	Se	Ag
Test	X	X	X	X	X	X	X	X	X	X	X	X	X
Method	200.8	200.8	200.8	200.8	200.8	200.8	200.8	200.8	200.8	200.8	365.1	200.8	200.8
Preservative	HNO3	HNO3	HNO3	HNO3	HNO3	HNO3	HNO3	HNO3	HNO3	HNO3	Ice	HNO3	HNO3

	Tl	V	Zn	Semi-Volatiles	NH3	pH	BOD	C6H5OH	Cn	TSS/TDS	Oil and Grease	S(2-)	Volatiles
Test	X	X	X	X	X	X	X	X	X	X	X	X	X
Method	200.8	200.8	200.8	625	350.1	150.1	405.1	420.1	335.4	2540B	1664A	376.1	624
Preservative	HNO3	HNO3	HNO3	Ice	H2SO4	Ice	Ice	H2SO4	NaOH	Ice	H2SO4	NaOH+Zn Acetate	HCL

Relinquished by: Lisa Wright Date/Time 4-17-14 Received by: MJ Date/Time 4/17/14 1:55

Relinquished by: _____ Date/Time _____ Received by: _____ Date/Time _____

Relinquished by: _____ Date/Time _____ Received by: _____ Date/Time _____

HEPACO
3645 Oakcliff Road
Doraville, GA 30340
Tel: 770-934-1180
Email: jbrimley@hepaco.com
lwright@hepaco.com

Analytical Environmental Services, Inc Date: 25-Apr-14

Client: Hepoco, Inc. Project: Habersham Tank #1 Lab ID: 1404163	**Case Narrative**

Sample Receiving Nonconformance:

Samples 1404163-001B and 1404163-001E as received did not meet the method specified pH range for the requested test methods for metals/mercury and ammonia, respectively. No attempt to further adjust the pH was made due to sample matrix.

The project name was reported as the sample ID "Habersham Tank #1"

Volatile Organic Compounds Analysis by Method 8260B:

Due to sample matrix, sample 1404163-001A required dilution during preparation and/or analysis resulting in elevated reporting limits.

Semi-Volatiles Analysis by Method 625:

LCS-189587 recovery for 4,6-Dinitro-2-methylphenol was outside control limits biased high. Target analyte was not detected in the analytical samples, and data is reportable with high bias.

Due to sample matrix, sample 1404163-001D required dilution during preparation and/or analysis resulting in elevated reporting limits.

Metals Analysis by Method 200.8:

Due to sample matrix, sample 1404163-001B required dilution during analysis resulting in elevated reporting limits.

Sulfide Analysis by Method SM4500S2 F:

Due to sample matrix, samples in Batch R266159 were dewatered during analysis; therefore, no matrix spike and matrix spike duplicate were performed. LCSD performed as additional QC.

Ammonia-Nitrogen Analysis by Method 350.1:

Due to sample matrix, sample 1404163-001 required dilution during preparation and/or analysis resulting in an elevated reporting limit.

Analytical Environmental Services, Inc Date: 25-Apr-14

Client:	Hepaco, Inc.	Client Sample ID:	HABERSHAM TANK #1
Project Name:	Habersham Tank #1	Collection Date:	4/17/2014 10:00:00 AM
Lab ID:	1404163-001	Matrix:	Waste Water

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
Trace Elements by ICP/MS E200.8				(E200.2)				
Antimony	43.7	10.0		ug/L	189982	2	04/22/2014 16:36	MR
Arsenic	BRL	1000		ug/L	189982	200	04/22/2014 17:54	MR
Barium	107	20.0		ug/L	189982	2	04/22/2014 16:36	MR
Beryllium	BRL	20.0		ug/L	189982	20	04/22/2014 17:23	MR
Cadmium	1.31	0.700		ug/L	189982	2	04/22/2014 16:36	MR
Chromium	BRL	1000		ug/L	189982	200	04/22/2014 17:54	MR
Copper	605	10.0		ug/L	189982	2	04/22/2014 16:36	MR
Lead	43.3	2.00		ug/L	189982	2	04/22/2014 16:36	MR
Nickel	BRL	1000		ug/L	189982	200	04/22/2014 17:54	MR
Selenium	BRL	1000		ug/L	189982	200	04/22/2014 17:54	MR
Silver	BRL	1.00		ug/L	189982	2	04/22/2014 16:36	MR
Thallium	2.77	2.00		ug/L	189982	2	04/22/2014 16:36	MR
Vanadium	BRL	1000		ug/L	189982	200	04/22/2014 17:54	MR
Zinc	3840	2000		ug/L	189982	200	04/22/2014 17:54	MR
Total Oil and Grease (HEM) E1664A				(E1664)				
Oil and Grease	110	5.0		mg/L	190135	1	04/24/2014 15:30	JW
Total Mercury E245.1				(E245.1)				
Mercury	BRL	0.00020		mg/L	190006	1	04/23/2014 12:33	CG
Total Cyanide (SM4500 CN-C, E)				(SM4500-CN-E)				
Cyanide, Total	BRL	0.010		mg/L	190139	1	04/23/2014 17:45	EH
Sulfide by SM4500-S2-F								
Sulfide	1.20	1.00		mg/L	R266159	1	04/22/2014 17:45	EH
Residue, Suspended (TSS) by SM2540D								
Residue, Suspended (TSS)	30.5	5.0		mg/L	189881	1	04/23/2014 16:55	OM
Residue, Dissolved (TDS) by SM2540C								
Residue, Dissolved (TDS)	10300	10		mg/L	189997	1	04/18/2014 10:00	LB
PRIORITY POLLUTANT-VOLATILES E624				(E624)				
1,1,1-Trichloroethane	BRL	20		ug/L	189924	10	04/19/2014 01:12	AR
1,1,2,2-Tetrachloroethane	BRL	20		ug/L	189924	10	04/19/2014 01:12	AR
1,1,2-Trichloroethane	BRL	20		ug/L	189924	10	04/19/2014 01:12	AR
1,1-Dichloroethane	BRL	20		ug/L	189924	10	04/19/2014 01:12	AR
1,1-Dichloroethene	BRL	20		ug/L	189924	10	04/19/2014 01:12	AR
1,2-Dichlorobenzene	BRL	50		ug/L	189924	10	04/19/2014 01:12	AR
1,2-Dichloroethane	BRL	20		ug/L	189924	10	04/19/2014 01:12	AR

Qualifiers:
- * Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- > Greater than Result value
- E Estimated (value above quantitation range)
- S Spike Recovery outside limits due to matrix
- Narr See case narrative
- NC Not confirmed
- < Less than Result value
- J Estimated value detected below Reporting Limit

Analytical Environmental Services, Inc Date: 25-Apr-14

Client:	Hepaco, Inc.	Client Sample ID:	HABERSHAM TANK #1
Project Name:	Habersham Tank #1	Collection Date:	4/17/2014 10:00:00 AM
Lab ID:	1404163-001	Matrix:	Waste Water

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
PRIORITY POLLUTANT-VOLATILES E624				(E624)				
1,2-Dichloropropane	BRL	20		ug/L	189924	10	04/19/2014 01:12	AR
1,3-Dichlorobenzene	BRL	50		ug/L	189924	10	04/19/2014 01:12	AR
1,4-Dichlorobenzene	BRL	50		ug/L	189924	10	04/19/2014 01:12	AR
2-Chloroethyl vinyl ether	BRL	100		ug/L	189924	10	04/19/2014 01:12	AR
Acrolein	BRL	500		ug/L	189924	10	04/19/2014 01:12	AR
Acrylonitrile	BRL	500		ug/L	189924	10	04/19/2014 01:12	AR
Benzene	BRL	20		ug/L	189924	10	04/19/2014 01:12	AR
Bromodichloromethane	BRL	100		ug/L	189924	10	04/19/2014 01:12	AR
Bromoform	BRL	100		ug/L	189924	10	04/19/2014 01:12	AR
Bromomethane	BRL	100		ug/L	189924	10	04/19/2014 01:12	AR
Carbon tetrachloride	BRL	20		ug/L	189924	10	04/19/2014 01:12	AR
Chlorobenzene	BRL	100		ug/L	189924	10	04/19/2014 01:12	AR
Chloroethane	BRL	50		ug/L	189924	10	04/19/2014 01:12	AR
Chloroform	BRL	20		ug/L	189924	10	04/19/2014 01:12	AR
Chloromethane	BRL	100		ug/L	189924	10	04/19/2014 01:12	AR
cis-1,3-Dichloropropene	BRL	20		ug/L	189924	10	04/19/2014 01:12	AR
Dibromochloromethane	BRL	100		ug/L	189924	10	04/19/2014 01:12	AR
Ethylbenzene	BRL	20		ug/L	189924	10	04/19/2014 01:12	AR
Methylene chloride	BRL	100		ug/L	189924	10	04/19/2014 01:12	AR
Tetrachloroethene	BRL	20		ug/L	189924	10	04/19/2014 01:12	AR
Toluene	BRL	20		ug/L	189924	10	04/19/2014 01:12	AR
trans-1,2-Dichloroethene	BRL	20		ug/L	189924	10	04/19/2014 01:12	AR
trans-1,3-Dichloropropene	BRL	20		ug/L	189924	10	04/19/2014 01:12	AR
Trichloroethene	BRL	20		ug/L	189924	10	04/19/2014 01:12	AR
Trichlorofluoromethane	BRL	50		ug/L	189924	10	04/19/2014 01:12	AR
Vinyl chloride	BRL	100		ug/L	189924	10	04/19/2014 01:12	AR
Xylenes, Total	BRL	50		ug/L	189924	10	04/19/2014 01:12	AR
Surr: 4-Bromofluorobenzene	104	66.2-120		%REC	189924	10	04/19/2014 01:12	AR
Surr: Dibromofluoromethane	105	79.5-121		%REC	189924	10	04/19/2014 01:12	AR
Surr: Toluene-d8	99.1	77-117		%REC	189924	10	04/19/2014 01:12	AR
PRIORITY POLLUTANT-SEMIVOLATILE ORGANICS E625				(E625)				
1,2,4-Trichlorobenzene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
1,2-Dichlorobenzene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
1,2-Diphenylhydrazine	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
1,3-Dichlorobenzene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
1,4-Dichlorobenzene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
2,4,6-Trichlorophenol	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
2,4-Dichlorophenol	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
2,4-Dimethylphenol	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
2,4-Dinitrophenol	BRL	630		ug/L	189587	5	04/19/2014 00:24	YH

Qualifiers:

- * Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
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- > Greater than Result value
- E Estimated (value above quantitation range)
- S Spike Recovery outside limits due to matrix
- Narr See case narrative
- NC Not confirmed
- < Less than Result value
- J Estimated value detected below Reporting Limit

Analytical Environmental Services, Inc Date: 25-Apr-14

Client:	Hepaco, Inc.	Client Sample ID:	HABERSHAM TANK #1
Project Name:	Habersham Tank #1	Collection Date:	4/17/2014 10:00:00 AM
Lab ID:	1404163-001	Matrix:	Waste Water

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
PRIORITY POLLUTANT-SEMIVOLATILE ORGANICS E625				(E625)				
2,4-Dinitrotoluene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
2,6-Dinitrotoluene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
2-Chloronaphthalene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
2-Chlorophenol	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
2-Nitrophenol	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
3,3'-Dichlorobenzidine	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
4,6-Dinitro-2-methylphenol	BRL	500		ug/L	189587	5	04/19/2014 00:24	YH
4-Bromophenyl phenyl ether	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
4-Chloro-3-methylphenol	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
4-Chlorophenyl phenyl ether	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
4-Nitrophenol	BRL	630		ug/L	189587	5	04/19/2014 00:24	YH
Acenaphthene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Acenaphthylene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Anthracene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Benz(a)anthracene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Benzidine	BRL	2000		ug/L	189587	5	04/19/2014 00:24	YH
Benzo(a)pyrene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Benzo(b)fluoranthene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Benzo(g,h,i)perylene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Benzo(k)fluoranthene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Bis(2-chloroethoxy)methane	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Bis(2-chloroethyl)ether	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Bis(2-chloroisopropyl)ether	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Bis(2-ethylhexyl)phthalate	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Butyl benzyl phthalate	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Chrysene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Di-n-butyl phthalate	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Di-n-octyl phthalate	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Dibenz(a,h)anthracene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Diethyl phthalate	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Dimethyl phthalate	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Fluoranthene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Fluorene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Hexachlorobenzene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Hexachlorobutadiene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Hexachlorocyclopentadiene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Hexachloroethane	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Indeno(1,2,3-cd)pyrene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Isophorone	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
N-Nitrosodi-n-propylamine	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
N-Nitrosodimethylamine	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH

Qualifiers:
- * Value exceeds maximum contaminant level
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- > Greater than Result value
- E Estimated (value above quantitation range)
- S Spike Recovery outside Limits due to matrix
- Note See case narrative
- NC Not conformed
- < Less than Result value
- J Estimated value detected below Reporting Limit

Analytical Environmental Services, Inc Date: 25-Apr-14

Client:	Hepaco, Inc.	Client Sample ID:	HABERSHAM TANK #1
Project Name:	Habersham Tank #1	Collection Date:	4/17/2014 10:00:00 AM
Lab ID:	1404163-001	Matrix:	Waste Water

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
PRIORITY POLLUTANT-SEMIVOLATILE ORGANICS E625				(E625)				
N-Nitrosodiphenylamine	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Naphthalene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Nitrobenzene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Pentachlorophenol	BRL	630		ug/L	189587	5	04/19/2014 00:24	YH
Phenanthrene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Phenol	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Pyrene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Surr: 2,4,6-Tribromophenol	0	51.5-124	S	%REC	189587	5	04/19/2014 00:24	YH
Surr: 2-Fluorobiphenyl	43	51.7-118	S	%REC	189587	5	04/19/2014 00:24	YH
Surr: 2-Fluorophenol	54.2	26-120		%REC	189587	5	04/19/2014 00:24	YH
Surr: 4-Terphenyl-d14	99.5	45.2-137		%REC	189587	5	04/19/2014 00:24	YH
Surr: Nitrobenzene-d5	95	42-120		%REC	189587	5	04/19/2014 00:24	YH
Surr: Phenol-d5	42.8	12.3-120		%REC	189587	5	04/19/2014 00:24	YH
Phosphorus, ortho E365.1								
Phosphorus, Total Orthophosphate (As P)	56.0	5.00		mg/L	R265744	500	04/17/2014 17:47	LV
Phenolics, Total Recoverable E420.1				(E420.1)				
Phenolics, Total Recoverable	0.43	0.05		mg/L	190056	1	04/23/2014 14:35	LW
Nitrogen, Ammonia (as N) E350.1				(E350.1)				
Nitrogen, Ammonia (As N)	BRL	2.00		mg/L	190109	10	04/24/2014 15:13	LV
Hydrogen Ion (pH) by SM4500 H+ B								
pH	9.60	0.0100	H	pH Units	R266154	1	04/23/2014 09:15	OM
Biochemical Oxygen Demand (5 Day) by SM5210B								
Biochemical Oxygen Demand	3320	500		mg/L	189174	100	04/17/2014 16:00	MG

Qualifiers:
- * Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- > Greater than Result value
- E Estimated (value above quantitation range)
- S Spike Recovery outside limits due to matrix
- Nar See case narrative
- NC Not confirmed
- < Less than Result value
- J Estimated value detected below Reporting Limit

Analytical Environmental Services, Inc.

Sample/Cooler Receipt Checklist

Client Hepaco Work Order Number 1404163

Checklist completed by [signature] 4/17/14
Signature Date

Carrier name: FedEx __ UPS __ Courier __ Client ✓ US Mail __ Other _____

Shipping container/cooler in good condition? Yes ✓ No __ Not Present __

Custody seals intact on shipping container/cooler? Yes __ No __ Not Present ✓

Custody seals intact on sample bottles? Yes ✓ No __ Not Present __

Container/Temp Blank temperature in compliance? (4°C±2)* Yes ✓ No __

Cooler #1 3.2°C Cooler #2 _____ Cooler #3 _____ Cooler #4 _____ Cooler#5 _____ Cooler #6 _____

Chain of custody present? Yes ✓ No __

Chain of custody signed when relinquished and received? Yes ✓ No __

Chain of custody agrees with sample labels? Yes ✓ No __

Samples in proper container/bottle? Yes ✓ No __

Sample containers intact? Yes ✓ No __

Sufficient sample volume for indicated test? Yes ✓ No __

All samples received within holding time? 4/23/14 Yes ✓ No ✓

Was TAT marked on the COC? Yes ✓ No __

Proceed with Standard TAT as per project history? Yes __ No __ Not Applicable ✓

Water - VOA vials have zero headspace? No VOA vials submitted __ Yes ✓ No __

Water - pH acceptable upon receipt? Yes __ No ✓ Not Applicable __

Adjusted? _____ Checked by [initials]

Sample Condition: Good ✓ Other(Explain) _____

(For diffusive samples or AIHA lead) Is a known blank included? Yes __ No ✓

See Case Narrative for resolution of the Non-Conformance.

* Samples do not have to comply with the given range for certain parameters.

\\L\Quality Assurance\Checklists Procedures Sign-Off Templates\Checklists\Sample Receipt Checklists\Sample_Cooler_Receipt_Checklist

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Analytical Environmental Services, Inc

Date: 25-Apr-14

Client: Hepaco, Inc.
Project: Habersham Tank #1
Lab Order: 1404I63

Dates Report

Lab Sample ID	Client Sample ID	Collection Date	Matrix	Test Name	TCLP Date	Prep Date	Analysis Date
1404I63-001A	HABERSHAM TANK #1	4/17/2014 10:00:00AM	WASTE Water	PP-VOLATILES		04/17/2014	04/19/2014
1404I63-001B	HABERSHAM TANK #1	4/17/2014 10:00:00AM	Waste Water	Trace Elements by ICP/MS		04/21/2014	04/22/2014
1404I63-001B	HABERSHAM TANK #1	4/17/2014 10:00:00AM	Waste Water	TOTAL MERCURY		04/23/2014	04/23/2014
1404I63-001C	HABERSHAM TANK #1	4/17/2014 10:00:00AM	Waste Water	Phosphorus, ortho			04/17/2014
1404I63-001D	HABERSHAM TANK #1	4/17/2014 10:00:00AM	Waste Water	PP-SEMIVOLATILE ORGANICS		04/18/2014	04/19/2014
1404I63-001E	HABERSHAM TANK #1	4/17/2014 10:00:00AM	Waste Water	Nitrogen, Ammonia (as N)		04/23/2014	04/24/2014
1404I63-001F	HABERSHAM TANK #1	4/17/2014 10:00:00AM	Waste Water	Biochemical Oxygen Demand by SM5210B		04/17/2014	04/17/2014
1404I63-001F	HABERSHAM TANK #1	4/17/2014 10:00:00AM	Waste Water	Hydrogen Ion (pH) by SM4500 H+ B			04/23/2014
1404I63-001F	HABERSHAM TANK #1	4/17/2014 10:00:00AM	Waste Water	Residue, Dissolved (TDS) by SM2540C		04/18/2014	04/18/2014
1404I63-001F	HABERSHAM TANK #1	4/17/2014 10:00:00AM	Waste Water	Residue, Suspended (TSS) by SM2540D		04/23/2014	04/23/2014
1404I63-001G	HABERSHAM TANK #1	4/17/2014 10:00:00AM	Waste Water	Phenolics, Total Recoverable		04/22/2014	04/23/2014
1404I63-001H	HABERSHAM TANK #1	4/17/2014 10:00:00AM	Waste Water	Oil and Grease		04/24/2014	04/24/2014
1404I63-001I	HABERSHAM TANK #1	4/17/2014 10:00:00AM	Waste Water	Sulfide by SM4500-S2-F			04/22/2014
1404I63-001J	HABERSHAM TANK #1	4/17/2014 10:00:00AM	Waste Water	Total Cyanide		04/23/2014	04/23/2014