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Submitted by: Brian Kennedy

Telephone Number: 3-4383

Comments:

1. Consent Agreement & Final Order - 9/18/2014
2. Copy of Penalty Transmittal Check - 10/6/2014
3. Q3 2014 Pond Closure Progress Report - 10/7/2014
4. Q4 2014 Pond Closure Progress Report - 1/14/2015

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January 14, 2015

RCRA Branch (LR-8J)
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

Attention: Mr. Brian Kennedy

Reference: Quarterly Progress Report
Consent Agreement and Final Order (CAFO)
Docket No. RCRA-05-2014-0013
Project No. 216406.0000

Dear Mr. Kennedy:

TRC Environmental Corporation (TRC), is pleased to submit, on behalf of Canton Drop Forge (CDF), the attached Progress Report for the **Fourth Quarter 2014**, as agreed to in the Consent Agreement and Final Order (CAFO) journalized by the United States Environmental Protection Agency (U.S. EPA) on September 18, 2014.

Should you have any questions regarding the enclosed document, please contact me at (216) 344-3072 or via e-mail kteuscher@trcsolutions.com.

Sincerely,

TRC Environmental Corporation

Kathleen R. Teuscher

Kathleen R. Teuscher
Risk Assessor/Project Manager

cc: Erik Hagen – DERR CO, Ohio EPA
Don Vogel – DERR CO, Ohio EPA
Ron Shadrach – DHWM, NEDO
Eaton Weiler – U.S. EPA, Region 5
Brad Ahbe – CDF

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PROGRESS REPORT – Fourth Quarter 2014
Canton Drop Forge, Inc.
Canton, Ohio
U.S. EPA ID No. OHD00446S142

A. IDENTIFICATION OF FACILITY AND ACTIVITY

This quarterly Progress Report is required by the Consent Agreement and Final Order (CAFO), effective date September 18, 2014, between the U.S. EPA Region 5 and Canton Drop Forge, Inc. (CDF). The CAFO is for the CDF Facility located at 4575 Southway Street SW, Canton, Ohio. At the request of CDF, TRC Environmental Corporation (TRC) has prepared this Progress Report. As required by Paragraph 47 of the CAFO, this Progress Report discusses the work performed during the previous quarter, the data collected, and any problems encountered. This Report also includes a progress update on tasks specified on the project schedule.

B. STATUS OF WORK AT THE FACILITY AND PROGRESS DURING THE QUARTER

The CDF Ponds Closure Plan (Closure Plan), dated September 8, 2014, was approved by Ohio EPA on October 29, 2014. Implementation of the Closure Plan and related tasks are listed below.

(i) The status of the removal of oil-water emulsion from Pond Nos. 1 and 2.

Construction of the upgraded oil-water separator (OWS) system has been completed. In the interim and until the upgraded OWS system was fully operational, CDF performed routine inspections of the existing oil-water separator to prevent discharges of oil to the ponds. The upgraded OWS was operational on December 12, 2014.

All liquids from Pond No. 1 were removed during November and December, 2014 in preparation for the remediation of the solids in Pond No. 1. The volume of oil-water emulsion removed off-site from frac tanks is approximately 20,000 gal. This includes the oil-water emulsion from the existing OWS that was removed during the routine inspections. The oil-water emulsion was pumped to a temporary frac tank pending final disposal and transported to Everclear of Ohio Ltd. (Everclear) in Austintown, Ohio as listed below.

Date	Invoice #	Description	Vol. (gal)
11/6/2014	26792	water with some used oil	4,000
11/10/2014	26795	water with some used oil	4,000
11/17/2014	26811	water with some used oil	4,000
12/16/2014	26852	water with some used oil	4,000
12/30/2014	26888	water with some used oil (from new OWS)	4,000

The disposal documentation has not been received from the disposal facility, and will be provided in the next quarterly report.

The rope skimmer for Pond No. 2 has been operating on an as-needed basis during the quarter to remove oil that accumulated on the surface of the pond. Oil from the rope skimmer in Pond No. 2 is stored in an adjacent above ground storage tank pending proper disposal. During inspections by TRC on October 24, 2014 and other times during the quarter, minimal separate phase oil was

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observed on Pond No. 2 (see photographs in Attachment 3). Any remaining oil on Pond No. 2 will be removed upon implementation of remediation of Pond No. 2 scheduled for Spring 2015. Disposal documentation for liquids removed from Pond No. 2 will be provided upon receipt from the disposal facility.

(ii) The status of the excavation of oil-impacted bottom material from Pond Nos. 1 and 2.

Most of the oil-impacted bottom material from Pond No. 1 was removed for off-site disposal at Everclear by close of the fourth quarter. A minor amount of removal work is expected in January, 2015 to conclude this remedial phase. Bottom material includes the biocell material encapsulated by the clay liner and the clay liner. Results from samples collected for waste characterization are provided in Attachment 1. The volume of bottom materials removed from Pond No. 1 is approximately 7,238 tons at the close of the fourth quarter. Daily activity reports are provided in Attachment 2. Documentation of waste transport and disposal of the solid materials removed from the Pond 1 excavation has not been received from the disposal facility, and will be included with the next quarterly report. Photographs of excavation activities are provided in Attachment 3.

In order to monitor the work, the Ohio Environmental Protection Agency had personnel on-site on the following dates:

December 12, 2014
December 19, 2014
December 23, 2014

Excavation of oil-impacted bottom material from Pond No. 2 is scheduled for Spring 2015, but cannot occur until the sanitary sewer connection is completed.

(iii) The status of the excavation of oil-affected soils adjacent to Pond Nos. 1 and 2.

At the close of the fourth quarter of 2014, most of the oil-affected soil adjacent to Pond No. 1 had been removed. This material was disposed with the bottom material described above, and the volumes were not tracked separately. Documentation of waste transport and disposal of the solid materials removed from the sidewalls and adjacent soils of the Pond 1 excavation has not been received from the disposal facility, and will be included with the next quarterly report. Photographs showing the excavation of the adjacent soils are provided in Attachment 3.

Excavation of oil-affected soil adjacent to Pond No. 2 is scheduled for Spring 2015.

(iv) The status of confirmatory sampling (as applicable).

No confirmatory sampling was performed at close of the fourth quarter. Ohio EPA will perform a visual inspection of Pond No. 1 during January 2014 to provide concurrence that all residuals within the Pond No. 1 unit have been removed as described in the approved Closure Plan.

(v) The status of backfilling and restoration of Ponds Nos. 1 and 2.

Backfilling and restoration of Pond 1 is pending completion of the removal of all residuals from Pond 1. Remediation of Pond 2 is scheduled for Spring 2015.

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C. PROBLEMS ENCOUNTERED DURING THE QUARTER

Minimal delays occurred due to extreme cold. Otherwise, no problems were encountered during this quarter.

D. ACTIONS TAKEN TO RECTIFY PROBLEMS

Not applicable.

E. PROJECT SCHEDULE

The project schedule and progress report is presented below by task:

Item	Task	Description of Status
1	Consent Agreement and Final Order U.S. EPA Docket No. RCRA-05-2014-0013	Effective date 9/18/2014.
2	Closure Plan Submittal	Received by Ohio EPA on September 9, 2014. Approved October 29, 2014
3	Agency Review and 30-day Public Notice Period	Submitted for public comment period ending October 17, 2014. Closure Plan Approved October 29, 2014
4	Installation/implementation of upgraded Oil Water Separator (OWS) system	Construction complete.
5	Contractor Procurement/Mobilization (including 10-Day Notification to Ohio EPA prior to mobilization)	Kick-off meeting held at CDF on November 19, 2014. Attendees included CDF, Ohio EPA, and TRC Environmental. The meeting served as the 10-day notification to Ohio EPA. Environmental Management Specialists, Inc. (EMS) is procured through CDF as the contractor performing the excavation. TRC is performing oversight.
6	Pond 1 Remediation: - dewatering, excavation, disposal - visual inspection (CDF/Ohio EPA) and verification of completion	Pond 1 remediation was initiated following the above 10-day notification. Dewatering, excavation, and disposal were near completion as of the close of the fourth quarter 2014, with removal of the bottom clay liner overlapping into the first quarter of 2015. Visual inspection by Ohio EPA to verify completion is scheduled for January 2015.
7	Pond 1 backfill, installation of clay liner	To be implemented pending completion of previous tasks.

Item	Task	Description of Status
8	Pond 2 Remediation: - dewatering, excavation, disposal - visual inspection (CDF/Ohio EPA)	To be initiated following completion of the remediation of Pond 1.
9	Pond 2 installation of clay liner	To be implemented following completion of previous tasks.
10	Closure Certification Document (60 days of completion of the closure activities)	To be completed following conclusion of previous tasks.
11	Quarterly Progress Reports	Initiated 3rd quarter 2014.

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ATTACHMENT 1

WASTE CHARACTERIZATION ANALYTICAL DATA

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Canton Drop Forge

Project No. 216406.0000

Waste Characterization Data Summary (Pond Bottom Material)

Analytical Group	Chemical	Regulatory Limt[1]	Pond 1 Bottom Material							
			240-38973-1 PB1-01 06/26/2014	240-38973-2 PB1-02 06/26/2014	240-38973-3 PB1-03 06/26/2014	240-38973-4 PB1-04 06/26/2014	240-38973-5 PB1-05 06/26/2014	240-38973-6 PB1-06 06/26/2014	240-38973-7 PB1-07 06/26/2014	240-38973-8 PB1-08 06/26/2014
GENERAL CHEM	CORROSIVITY BY PH SU	pH<2 or pH>12.5	7.58	7.44	0.100 U	7.74	7.66	7.52	7.14	7.53
GENERAL CHEM	FLASHPOINT DEGREES F	≥ 140 °F	>200	>200	>200	>200	>200	>200	>200	>200
METALS	ARSENIC-TCLP MG/L	5	**0.0061 J B**	**0.010 J B**	**0.010 J B**	**0.0096 J B**	**0.0073 J B**	**0.010 J B**	**0.018 J B**	**0.012 J B**
METALS	BARIUM-TCLP MG/L	100	**1.2 J**	**1.6 J**	**1.3 J**	**1.7 J**	**1.4 J**	**0.99 J**	**0.46 J**	**1.3 J**
METALS	CADMIUM-TCLP MG/L	1	0.10 U J	0.10 U J	0.10 U J	0.10 U J	0.10 U J	0.10 U J	0.10 U J	0.10 U J
METALS	CHROMIUM-TCLP MG/L	5	0.50 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U
METALS	LEAD-TCLP MG/L	5	**0.0071 J B**	**0.0026 J B**	**0.0064 J B**	**0.031 J B**	**0.0025 J B**	**0.011 J B**	**0.0040 J B**	**0.011 J B**
METALS	MERCURY-TCLP MG/L	0.2	0.0020 U	0.0020 U	0.0020 U	0.0020 U	0.0020 U	0.0020 U	0.0020 U	0.0020 U
METALS	SELENIUM-TCLP MG/L	1	0.25 U	0.25 U	0.25 U	0.25 U	0.25 U	**0.0059 J B**	**0.0054 J B**	0.25 U
METALS	SILVER-TCLP MG/L	5	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U
SEMI-VOLATILE	1,4-DICHLOROBENZENE-TCLP MG/L	7.5	0.0040 U	0.0040 U	0.0040 U	0.0040 U	0.0040 U	0.0040 U	0.0040 U	0.0040 U
SEMI-VOLATILE	2,4,5-TRICHLOROPHENOL-TCLP MG/L	400	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U
SEMI-VOLATILE	2,4,6-TRICHLOROPHENOL-TCLP MG/L	2	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U
SEMI-VOLATILE	2,4-DINITROTOLUENE-TCLP MG/L	0.13	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U
SEMI-VOLATILE	2-METHYLPHENOL-TCLP MG/L	200 [2]	0.0040 U	0.0040 U	0.0040 U	0.0040 U	0.0040 U	0.0040 U	0.0040 U	0.0040 U
SEMI-VOLATILE	3 & 4 METHYLPHENOL-TCLP MG/L	200 [2]	0.040 U	0.040 U	0.040 U	0.040 U	0.040 U	0.040 U	**0.00088 J**	0.040 U
SEMI-VOLATILE	HEXACHLOROBENZENE-TCLP MG/L	0.13	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U
SEMI-VOLATILE	HEXACHLOROBUTADIENE-TCLP MG/L	0.5	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U
SEMI-VOLATILE	HEXACHLOROETHANE-TCLP MG/L	3	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U
SEMI-VOLATILE	NITROBENZENE-TCLP MG/L	2	0.0040 U	0.0040 U	0.0040 U	0.0040 U	0.0040 U	0.0040 U	0.0040 U	0.0040 U
SEMI-VOLATILE	PENTACHLOROPHENOL-TCLP MG/L	100	0.040 U	0.040 U	0.040 U	0.040 U	0.040 U	0.040 U	0.040 U	0.040 U
SEMI-VOLATILE	PYRIDINE-TCLP MG/L	5	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U
VOLATILES	1,1-DICHLOROETHENE-TCLP MG/L	0.7	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES	1,2-DICHLOROETHANE-TCLP MG/L	0.5	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES	2-BUTANONE (MEK)-TCLP MG/L	200	0.25 U	0.25 U	0.25 U	**0.038 J**	0.25 U	0.25 U	0.25 U	0.25 U
VOLATILES	BENZENE-TCLP MG/L	0.5	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES	CARBON TETRACHLORIDE-TCLP MG/L	0.5	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES	CHLOROBENZENE-TCLP MG/L	100	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES	CHLOROFORM-TCLP MG/L	6	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES	TETRACHLOROETHENE-TCLP MG/L	0.7	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES	TRICHLOROETHENE-TCLP MG/L	0.5	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES	VINYL CHLORIDE-TCLP MG/L	0.2	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U

Bold = detected concentration

[1] As presented in 40 CFR Part 261 Subpart C.

[2] If o-, m-, and p-Cresol concentrations cannot be differentiated, the total cresol (D026) concentration is used. The regulatory level of total cresol is 200 mg/l.

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BIN # Jennifer Chechelnes

Canton Drop Forge

Project No. 216406.0000

Waste Characterization Data Summary (Pond Bottom Material)

Analytical Group	Chemical	Regulatory Limt[1]	240-38973-9 PB1-09 06/26/2014	240-38973-10 PB1-10 06/26/2014	240-38973-11 PB1-11 06/26/2014	240-38973-12 PB1-12 06/26/2014	Pond 1 Soil Borings 240-38973-28 P1-SB-01 06/26/2014	240-38973-29 P1-SB-02 06/26/2014	240-38973-30 P1-SB-03 06/26/2014	240-38973-13 PB2-01 06/24/2014
GENERAL CHEM	CORROSIVITY BY PH SU	pH<2 or pH>12.5	7.60	7.82	7.20	7.81	9.94	6.14	8.19	7.65
GENERAL CHEM	FLASHPOINT DEGREES F	≥ 140 °F	>200	>200	>200	>200	>200	>200	>200	>200
METALS	ARSENIC-TCLP MG/L	5	**0.0096 J B**	**0.011 J B**	**0.0093 J**	**0.0082 J**	**0.0036 J B**	**0.50 U**	**0.0045 J B**	**0.11 J**
METALS	BARIUM-TCLP MG/L	100	**1.4 J**	**0.53 J**	**2.1 J**	**0.84 J**	**0.32 J**	**0.073 J**	**0.80 J**	**1.4 J**
METALS	CADMIUM-TCLP MG/L	1	0.10 U J	0.10 U J	0.10 U	0.10 U	0.10 U	0.10 U	**0.0016 J**	0.10 U
METALS	CHROMIUM-TCLP MG/L	5	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U
METALS	LEAD-TCLP MG/L	5	0.50 U	**0.0027 J B**	**0.0028 J**	0.50 U	0.50 U	**0.0038 J**	0.50 U	0.50 U
METALS	MERCURY-TCLP MG/L	0.2	0.0020 U	0.0020 U	0.0020 U	0.0020 U	0.0020 U	0.0020 U	0.0020 U	0.0020 U
METALS	SELENIUM-TCLP MG/L	1	0.25 U	0.25 U	0.25 U	**0.0096 J B**	**0.0077 J B**	**0.0066 J B**	**0.0095 J B**	**0.013 J B**
METALS	SILVER-TCLP MG/L	5	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U
SEMI-VOLATILE	1,4-DICHLOROBENZENE-TCLP MG/L	7.5	0.0040 U	0.0040 U	0.0040 U	0.0040 U	0.0040 U	0.0040 U	0.0040 U	0.0040 U
SEMI-VOLATILE	2,4,5-TRICHLOROPHENOL-TCLP MG/L	400	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U
SEMI-VOLATILE	2,4,6-TRICHLOROPHENOL-TCLP MG/L	2	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U
SEMI-VOLATILE	2,4-DINITROTOLUENE-TCLP MG/L	0.13	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U
SEMI-VOLATILE	2-METHYLPHENOL-TCLP MG/L	200 [2]	0.0040 U	0.0040 U	0.0040 U	0.0040 U	0.0040 U	0.0040 U	0.0040 U	0.0040 U
SEMI-VOLATILE	3 & 4 METHYLPHENOL-TCLP MG/L	200 [2]	0.040 U	0.040 U	0.040 U	0.040 U	0.040 U	0.040 U	0.040 U	0.040 U
SEMI-VOLATILE	HEXACHLOROBENZENE-TCLP MG/L	0.13	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U
SEMI-VOLATILE	HEXACHLOROBUTADIENE-TCLP MG/L	0.5	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U
SEMI-VOLATILE	HEXACHLOROETHANE-TCLP MG/L	3	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U
SEMI-VOLATILE	NITROBENZENE-TCLP MG/L	2	0.0040 U	0.0040 U	0.0040 U	0.0040 U	0.0040 U	0.0040 U	0.0040 U	0.0040 U
SEMI-VOLATILE	PENTACHLOROPHENOL-TCLP MG/L	100	0.040 U	0.040 U	0.040 U	0.040 U	0.040 U	0.040 U	0.040 U	0.040 U
SEMI-VOLATILE	PYRIDINE-TCLP MG/L	5	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U
VOLATILES	1,1-DICHLOROETHENE-TCLP MG/L	0.7	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES	1,2-DICHLOROETHANE-TCLP MG/L	0.5	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES	2-BUTANONE (MEK)-TCLP MG/L	200	**0.12 J**	0.25 U	0.25 U	0.25 U	0.25 U	0.25 U	0.25 U	0.25 U
VOLATILES	BENZENE-TCLP MG/L	0.5	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES	CARBON TETRACHLORIDE-TCLP MG/L	0.5	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U-*	0.025 U-*	0.025 U-*	0.025 U
VOLATILES	CHLOROBENZENE-TCLP MG/L	100	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES	CHLOROFORM-TCLP MG/L	6	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES	TETRACHLOROETHENE-TCLP MG/L	0.7	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES	TRICHLOROETHENE-TCLP MG/L	0.5	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U-*	0.025 U-*	0.025 U-*	0.025 U
VOLATILES	VINYL CHLORIDE-TCLP MG/L	0.2	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U

Bold = detected concentration

[1] As presented in 40 CFR Part 261 Subpart C.

[2] If o-, m-, and p-Cresol concentrations cannot be differentiated, the total cre:

Canton Drop Forge

Project No. 216406.0000

Waste Characterization Data Summary (Pond Bottom Material)

Analytical Group	Chemical	Regulatory Limt[1]	Pond 2 Bottom Material							
			240-38973-14 PB2-02 06/24/2014	240-38973-15 PB2-03 06/24/2014	240-38973-16 PB2-04 06/24/2014	240-38973-17 PB2-05 06/24/2014	240-38973-18 PB2-06 06/24/2014	240-38973-19 PB2-07 06/24/2014	240-38973-20 PB2-08 06/24/2014	240-38973-21 PB2-09 06/24/2014
GENERAL CHEM	CORROSIVITY BY PH SU	pH<2 or pH>12.5	7.36	8.06	8.04	8.58	7.84	8.02	7.75	7.75
GENERAL CHEM	FLASHPOINT DEGREES F	≥ 140 °F	>200	>200	>200	>200	>200	>200	>200	>200
METALS	ARSENIC-TCLP MG/L	5	**0.13 J**	**0.44 J**	**0.62**	**0.060 J B**	**0.21 J**	**0.20 J**	**0.14 J**	**0.16 J**
METALS	BARIUM-TCLP MG/L	100	**1.2 J**	**1.2 J**	**1.2 J**	**1.5 J**	**1.4 J**	**1.2 J**	**1.2 J**	**1.3 J**
METALS	CADMIUM-TCLP MG/L	1	**0.00071 J**	0.10 U	0.10 U	**0.00090 J**	0.10 U	**0.0019 J**	**0.0039 J**	**0.0011 J**
METALS	CHROMIUM-TCLP MG/L	5	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U
METALS	LEAD-TCLP MG/L	5	**0.0038 J**	**0.0074 J**	**0.0052 J**	0.50 U	**0.0054 J**	**0.012 J**	**0.0073 J**	**0.0063 J**
METALS	MERCURY-TCLP MG/L	0.2	0.0020 U	0.0020 U	0.0020 U	0.0020 U	0.0020 U	0.0020 U	0.0020 U	0.0020 U
METALS	SELENIUM-TCLP MG/L	1	**0.014 J B**	**0.012 J B**	**0.011 J B**	**0.015 J B**	**0.011 J B**	**0.012 J B**	**0.0086 J B**	**0.012 J B**
METALS	SILVER-TCLP MG/L	5	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U
SEMI-VOLATILE	1,4-DICHLOROBENZENE-TCLP MG/L	7.5	0.0040 U	0.0040 U	0.0040 U	0.0040 U	0.0040 U	0.0040 U	0.0040 U	0.0040 U
SEMI-VOLATILE	2,4,5-TRICHLOROPHENOL-TCLP MG/L	400	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 UJ
SEMI-VOLATILE	2,4,6-TRICHLOROPHENOL-TCLP MG/L	2	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 UJ
SEMI-VOLATILE	2,4-DINITROTOLUENE-TCLP MG/L	0.13	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U
SEMI-VOLATILE	2-METHYLPHENOL-TCLP MG/L	200 [2]	0.0040 U	0.0040 U	0.0040 U	0.0040 U	0.0040 U	0.0040 U	0.0040 U	0.0040 UJ
SEMI-VOLATILE	3 & 4 METHYLPHENOL-TCLP MG/L	200 [2]	0.040 U	0.040 U	0.040 U	0.040 U	0.040 U	0.040 U	0.040 U	0.0040 UJ
SEMI-VOLATILE	HEXACHLOROBENZENE-TCLP MG/L	0.13	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U
SEMI-VOLATILE	HEXACHLOROBUTADIENE-TCLP MG/L	0.5	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U
SEMI-VOLATILE	HEXACHLOROETHANE-TCLP MG/L	3	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U
SEMI-VOLATILE	NITROBENZENE-TCLP MG/L	2	0.0040 U	0.0040 U	0.0040 U	0.0040 U	0.0040 U	0.0040 U	0.0040 U	0.0040 U
SEMI-VOLATILE	PENTACHLOROPHENOL-TCLP MG/L	100	0.040 U	0.040 U	0.040 U	0.040 U	0.040 U	0.040 U	0.040 U	0.040 UJ
SEMI-VOLATILE	PYRIDINE-TCLP MG/L	5	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U
VOLATILES	1,1-DICHLOROETHENE-TCLP MG/L	0.7	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES	1,2-DICHLOROETHANE-TCLP MG/L	0.5	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES	2-BUTANONE (MEK)-TCLP MG/L	200	0.25 U	0.25 U	0.25 U	0.25 U	0.25 U	0.25 U	0.25 U	0.25 U
VOLATILES	BENZENE-TCLP MG/L	0.5	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES	CARBON TETRACHLORIDE-TCLP MG/L	0.5	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES	CHLOROBENZENE-TCLP MG/L	100	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES	CHLOROFORM-TCLP MG/L	6	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES	TETRACHLOROETHENE-TCLP MG/L	0.7	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES	TRICHLOROETHENE-TCLP MG/L	0.5	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES	VINYL CHLORIDE-TCLP MG/L	0.2	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U

Bold = detected concentration

[1] As presented in 40 CFR Part 261 Subpart C.

[2] If o-, m-, and p-Cresol concentrations cannot be differentiated, the total cre:

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Project No. 216406.0000

Waste Characterization Data Summary (Pond Bottom Material)

Analytical Group	Chemical	Regulatory Limt[1]	240-38973-21 RE PB2-09 06/24/2014	240-38973-22 PB2-10 06/24/2014	240-38973-23 PB2-11 06/24/2014	240-38973-24 PB2-12 06/24/2014	Pond 2 Soil Borings 240-38973-25 P2-SB-01 06/26/2014	240-38973-26 P2-SB-02 06/26/2014	240-38973-27 P2-SB-03 06/26/2014
GENERAL CHEM	CORROSIVITY BY PH SU	pH<2 or pH>12.5		7.69	7.55	7.65	9.54	11.5	7.52
GENERAL CHEM	FLASHPOINT DEGREES F	≥ 140 °F		>200	>200	>200	>200	>200	>200
METALS	ARSENIC-TCLP MG/L	5		**0.14 J B**	**0.18 J B**	**0.35 J B**	**0.0063 J B**	**0.0045 J B**	**0.012 J B**
METALS	BARIUM-TCLP MG/L	100		**1.1 J**	**1.2 J**	**1.2 J**	**1.2 J**	**0.21 J**	**1.8 J**
METALS	CADMIUM-TCLP MG/L	1		**0.0020 J**	**0.00086 J**	0.10 U	0.10 U	0.10 U	**0.0023 J**
METALS	CHROMIUM-TCLP MG/L	5	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U
METALS	LEAD-TCLP MG/L	5		**0.0060 J**	**0.0067 J**	**0.0049 J**	0.50 U	0.50 U	**0.0060 J**
METALS	MERCURY-TCLP MG/L	0.2		0.0020 U	0.0020 U	0.0020 U	0.0020 U	0.0020 U	0.0020 U
METALS	SELENIUM-TCLP MG/L	1		**0.015 J B**	**0.014 J B**	**0.0097 J B**	**0.013 J B**	**0.011 J B**	**0.011 J B**
METALS	SILVER-TCLP MG/L	5		0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U
SEMI-VOLATILE	1,4-DICHLOROBENZENE-TCLP MG/L	7.5	0.0040 U H R	0.0040 U	0.0040 U	0.0040 U	0.0040 U	0.0040 U	0.0040 U
SEMI-VOLATILE	2,4,5-TRICHLOROPHENOL-TCLP MG/L	400	0.020 U H R	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U
SEMI-VOLATILE	2,4,6-TRICHLOROPHENOL-TCLP MG/L	2	0.020 U H R	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U
SEMI-VOLATILE	2,4-DINITROTOLUENE-TCLP MG/L	0.13	0.020 U H R	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U
SEMI-VOLATILE	2-METHYLPHENOL-TCLP MG/L	200 [2]	0.0040 U H R	0.0040 U	0.0040 U	0.0040 U	0.0040 U	0.0040 U	0.0040 U
SEMI-VOLATILE	3 & 4 METHYLPHENOL-TCLP MG/L	200 [2]	0.040 U H R	0.040 U	0.040 U	0.040 U	**0.0051 J**	0.040 U	0.040 U
SEMI-VOLATILE	HEXACHLOROBENZENE-TCLP MG/L	0.13	0.020 U H R	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U
SEMI-VOLATILE	HEXACHLOROBUTADIENE-TCLP MG/L	0.5	0.020 U H R	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U
SEMI-VOLATILE	HEXACHLOROETHANE-TCLP MG/L	3	0.020 U H R	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U
SEMI-VOLATILE	NITROBENZENE-TCLP MG/L	2	0.0040 U H R	0.0040 U	0.0040 U	0.0040 U	0.0040 U	0.0040 U	0.0040 U
SEMI-VOLATILE	PENTACHLOROPHENOL-TCLP MG/L	100	0.040 U H R	0.040 U	0.040 U	0.040 U	0.040 U	0.040 U	0.040 U
SEMI-VOLATILE	PYRIDINE-TCLP MG/L	5	0.020 U H R	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U
VOLATILES	1,1-DICHLOROETHENE-TCLP MG/L	0.7		0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES	1,2-DICHLOROETHANE-TCLP MG/L	0.5		0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES	2-BUTANONE (MEK)-TCLP MG/L	200		0.25 U	0.25 U	0.25 U	0.25 U	0.25 U	0.25 U
VOLATILES	BENZENE-TCLP MG/L	0.5		0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES	CARBON TETRACHLORIDE-TCLP MG/L	0.5		0.025 U*	0.025 U*	0.025 U*	0.025 U*	0.025 U*	0.025 U*
VOLATILES	CHLOROBENZENE-TCLP MG/L	100		0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES	CHLOROFORM-TCLP MG/L	6		0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES	TETRACHLOROETHENE-TCLP MG/L	0.7		0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES	TRICHLOROETHENE-TCLP MG/L	0.5		0.025 U*	0.025 U*	0.025 U*	0.025 U*	0.025 U*	0.025 U*
VOLATILES	VINYL CHLORIDE-TCLP MG/L	0.2		0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U

Bold = detected concentration

[1] As presented in 40 CFR Part 261 Subpart C.

[2] If o-, m-, and p-Cresol concentrations cannot be differentiated, the total cre:

Canton Drop Forge

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Waste Characterization Data Summary (Pond Bottom Material - Composite Samples)

Chemical	Regulator Limit	240-38973-33 PB-1 COMP 06/27/2014	240-38973-35 P1-SB COMP 06/27/2014	240-38973-34 PB-2 COMP 06/27/2014	240-38973-36 P2-SB COMP 06/27/2014
HALOGENS, EXTRACTABLE ORGANIC MG/KG	1000 [1]	290 U	220 U	510 U	220 U
PAINT FILTER NONE	-- [2]	POS	NEG	POS	NEG

[1] According to EPA's Rebuttable Presumption Rule (40 CFR §261.3(a)(2)(v)) any used oil containing 1000 ppm of total halogens is assumed to have been mixed with hazardous waste and consequently the entire used oil/waste mixture constitutes hazardous waste. However, the rule also allows generators to rebut the presumption through further demonstrations.

[2] A specified amount of material is placed in a paint filter. If any portion of the material passes through and drops from the filter within the 5 minute test period, the material is deemed to contain free liquids. Waste containing free liquids may be placed in a landfill if the landfill has a liner and leachate collection and removal system that meet the requirements of § 264.301(a) or the liquid waste or waste containing free liquids is treated or stabilized, chemically or physically (e.g., by mixing with a sorbent solid), so that free liquids are no longer present.

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Waste Characterization Data Summary (Pond 2 Water)

ANAL_GRP	Chemical	240-38973-31 P2-SW-01 06/26/2014	240-38973-32 TB-01 06/26/2014
METALS	ARSENIC UG/L	5.1 J	
METALS	BARIUM UG/L	110 J B	
METALS	CADMIUM UG/L	2.0 U ^	
METALS	CHROMIUM UG/L	8.8	
METALS	LEAD UG/L	3.4	
METALS	MERCURY UG/L	0.20 U	
METALS	SELENIUM UG/L	5.0 U	
METALS	SILVER UG/L	5.0 U	
SEMI-VOLATILE	1,2,4-TRICHLOROBENZENE UG/L	0.99 U	
SEMI-VOLATILE	1,2-DICHLOROBENZENE UG/L	0.99 U	
SEMI-VOLATILE	1,3-DICHLOROBENZENE UG/L	0.99 U	
SEMI-VOLATILE	1,4-DICHLOROBENZENE UG/L	0.99 U	
SEMI-VOLATILE	2,2'-OXYBIS[1-CHLOROPROPANE] UG/L	0.99 U	
SEMI-VOLATILE	2,4,5-TRICHLOROPHENOL UG/L	5.0 U	
SEMI-VOLATILE	2,4,6-TRICHLOROPHENOL UG/L	5.0 U	
SEMI-VOLATILE	2,4-DICHLOROPHENOL UG/L	2.0 U	
SEMI-VOLATILE	2,4-DIMETHYLPHENOL UG/L	2.0 U	
SEMI-VOLATILE	2,4-DINITROPHENOL UG/L	5.0 U	
SEMI-VOLATILE	2,4-DINITROTOLUENE UG/L	5.0 U	
SEMI-VOLATILE	2,6-DINITROTOLUENE UG/L	5.0 U	
SEMI-VOLATILE	2-CHLORONAPHTHALENE UG/L	0.99 U	
SEMI-VOLATILE	2-CHLOROPHENOL UG/L	0.99 U	
SEMI-VOLATILE	2-METHYLNAPHTHALENE UG/L	0.20 U	
SEMI-VOLATILE	2-METHYLPHENOL UG/L	0.99 U	
SEMI-VOLATILE	2-NITROANILINE UG/L	2.0 U	
SEMI-VOLATILE	2-NITROPHENOL UG/L	2.0 U	
SEMI-VOLATILE	3 & 4 METHYLPHENOL UG/L	2.0 U	
SEMI-VOLATILE	3,3'-DICHLOROBENZIDINE UG/L	5.0 U	
SEMI-VOLATILE	3-NITROANILINE UG/L	2.0 U	
SEMI-VOLATILE	4,6-DINITRO-2-METHYLPHENOL UG/L	5.0 U J	
SEMI-VOLATILE	4-BROMOPHENYL PHENYL ETHER UG/L	2.0 U	
SEMI-VOLATILE	4-CHLORO-3-METHYLPHENOL UG/L	2.0 U	
SEMI-VOLATILE	4-CHLOROANILINE UG/L	2.0 U	
SEMI-VOLATILE	4-CHLOROPHENYL PHENYL ETHER UG/L	2.0 U	
SEMI-VOLATILE	4-NITROANILINE UG/L	2.0 U	
SEMI-VOLATILE	4-NITROPHENOL UG/L	5.0 U	
SEMI-VOLATILE	ACENAPHTHENE UG/L	0.20 U	
SEMI-VOLATILE	ACENAPHTHYLENE UG/L	0.20 U	
SEMI-VOLATILE	ANTHRACENE UG/L	0.20 U	
SEMI-VOLATILE	BENZO[A]ANTHRACENE UG/L	0.20 U	
SEMI-VOLATILE	BENZO[A]PYRENE UG/L	0.20 U	
SEMI-VOLATILE	BENZO[B]FLUORANTHENE UG/L	0.20 U	
SEMI-VOLATILE	BENZO[G,H,I]PERYLENE UG/L	0.20 U	
SEMI-VOLATILE	BENZO[K]FLUORANTHENE UG/L	0.20 U	
SEMI-VOLATILE	BIS(2-CHLOROETHOXY)METHANE UG/L	0.99 U	
SEMI-VOLATILE	BIS(2-CHLOROETHYL)ETHER UG/L	0.99 U	
SEMI-VOLATILE	BIS(2-ETHYLHEXYL) PHTHALATE UG/L	5.0 U * J	
SEMI-VOLATILE	BUTYL BENZYL PHTHALATE UG/L	2.0 U	
SEMI-VOLATILE	CHRYSENE UG/L	0.20 U	
SEMI-VOLATILE	DIBENZ(A,H)ANTHRACENE UG/L	0.20 U	
SEMI-VOLATILE	DIBENZOFURAN UG/L	0.99 U	
SEMI-VOLATILE	DIETHYL PHTHALATE UG/L	2.0 U	
SEMI-VOLATILE	DIMETHYL PHTHALATE UG/L	2.0 U	
SEMI-VOLATILE	DI-N-BUTYL PHTHALATE UG/L	5.0 U	
SEMI-VOLATILE	DI-N-OCTYL PHTHALATE UG/L	2.0 UJ	

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ANAL_GRP	Chemical	240-38973-31 P2-SW-01 06/26/2014	240-38973-32 TB-01 06/26/2014
SEMI-VOLATILE	FLUORANTHENE UG/L	0.20 U	
SEMI-VOLATILE	FLUORENE UG/L	0.20 U	
SEMI-VOLATILE	HEXACHLOROBENZENE UG/L	0.20 U	
SEMI-VOLATILE	HEXACHLOROBUTADIENE UG/L	0.99 U	
SEMI-VOLATILE	HEXACHLOROCYCLOPENTADIENE UG/L	9.9 U	
SEMI-VOLATILE	HEXACHLOROETHANE UG/L	0.99 U	
SEMI-VOLATILE	INDENO[1,2,3-CD]PYRENE UG/L	0.20 U	
SEMI-VOLATILE	ISOPHORONE UG/L	0.99 U	
SEMI-VOLATILE	NAPHTHALENE UG/L	0.20 U	
SEMI-VOLATILE	NITROBENZENE UG/L	0.99 U	
SEMI-VOLATILE	N-NITROSODI-N-PROPYLAMINE UG/L	0.99 U	
SEMI-VOLATILE	N-NITROSODIPHENYLAMINE UG/L	0.99 U J	
SEMI-VOLATILE	PENTACHLOROPHENOL UG/L	5.0 U	
SEMI-VOLATILE	PHENANTHRENE UG/L	0.20 U	
SEMI-VOLATILE	PHENOL UG/L	0.99 U	
SEMI-VOLATILE	PYRENE UG/L	0.20 U	
VOLATILES	1,1,1-TRICHLOROETHANE UG/L	1.0 U	1.0 U
VOLATILES	1,1,2,2-TETRACHLOROETHANE UG/L	1.0 U	1.0 U
VOLATILES	1,1,2-TRICHLOROETHANE UG/L	1.0 U	1.0 U
VOLATILES	1,1-DICHLOROETHANE UG/L	1.0 U	1.0 U
VOLATILES	1,1-DICHLOROETHENE UG/L	1.0 U	1.0 U
VOLATILES	1,2-DICHLOROETHANE UG/L	1.0 U	1.0 U
VOLATILES	1,2-DICHLOROPROPANE UG/L	1.0 U	1.0 U
VOLATILES	2-BUTANONE (MEK) UG/L	1.9 J	10 U
VOLATILES	2-HEXANONE UG/L	10 U	10 U
VOLATILES	4-METHYL-2-PENTANONE (MIBK) UG/L	10 U	10 U
VOLATILES	ACETONE UG/L	17	10 U
VOLATILES	BENZENE UG/L	1.0 U	1.0 U
VOLATILES	BROMODICHLOROMETHANE UG/L	0.76 J	1.0 U
VOLATILES	BROMOFORM UG/L	1.0 U	1.0 U
VOLATILES	BROMOMETHANE UG/L	1.0 U	1.0 U
VOLATILES	CARBON DISULFIDE UG/L	1.0 U	1.0 U
VOLATILES	CARBON TETRACHLORIDE UG/L	1.0 U	1.0 U
VOLATILES	CHLOROBENZENE UG/L	1.0 U	1.0 U
VOLATILES	CHLOROETHANE UG/L	1.0 U	1.0 U
VOLATILES	CHLOROFORM UG/L	2.5 U	0.38 J
VOLATILES	CHLOROMETHANE UG/L	1.0 U	1.0 U
VOLATILES	CIS-1,2-DICHLOROETHENE UG/L	1.0 U	1.0 U
VOLATILES	CIS-1,3-DICHLOROPROPENE UG/L	1.0 U	1.0 U
VOLATILES	DIBROMOCHLOROMETHANE UG/L	0.58 J	1.0 U
VOLATILES	ETHYLBENZENE UG/L	1.0 U	1.0 U
VOLATILES	METHYL TERT-BUTYL ETHER UG/L	1.0 U	1.0 U
VOLATILES	METHYLENE CHLORIDE UG/L	1.0 U	1.0 U
VOLATILES	N-HEXANE UG/L	1.0 U	1.0 U
VOLATILES	STYRENE UG/L	1.0 U	1.0 U
VOLATILES	TETRACHLOROETHENE UG/L	1.0 U	1.0 U
VOLATILES	TOLUENE UG/L	1.0 U	1.0 U
VOLATILES	TRANS-1,2-DICHLOROETHENE UG/L	1.0 U	1.0 U
VOLATILES	TRANS-1,3-DICHLOROPROPENE UG/L	1.0 U	1.0 U
VOLATILES	TRICHLOROETHENE UG/L	0.20 J	1.0 U
VOLATILES	VINYL CHLORIDE UG/L	1.0 U	1.0 U
VOLATILES	XYLENES, TOTAL UG/L	2.0 U	2.0 U

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Waste Characterization Data Summary (Pond 1 Biocell Material)

ANAL_GRP	Chemical	Regulatory Limt[1]	240-44979-1 P1-BC-01 12/3/2014	240-44979-2 P1-BC-02 12/3/2014	240-44979-3 P1-BC-03 12/3/2014	240-45132-1 P1-BC-04 12/5/2014	240-45132-2 P1-BC-05 12/5/2014	240-45132-3 P1-BC-06 12/5/2014	240-45490-1 P1-BC-07 12/15/2014	240-45490-2 P1-BC-08 12/15/2014	240-45490-3 P1-BC-09 12/15/2014	240-44979-1 P1-BC-01 12/3/2014	240-44979-2 P1-BC-02 12/3/2014
GENERAL CHEM	CORROSIVITY BY PH SU	<2 or >12.5	8.91	9.29	8.71	10.3	9.31	11.4	9.19	8.92	9.14	8.91	9.29
GENERAL CHEM	FLASHPOINT DEGREES F	≥ 140 °F	>200	>200	>200	>200	>200	>200	>200	>200	>200	>200	>200
GENERAL CHEM	FREE LIQUID NONE	1000[2]	CNF	CNF	CNF	CNF	CNF	CNF	CNF	CNF	CNF	CNF	CNF
GENERAL CHEM	HALOGENS, EXTRACTABLE ORGANIC MG/KG	–[3]	220 U	220 U	220 U	220 U	220 U	220 U	220 U	220 U	220 U	220 U	220 U
METALS (TCLP)	ARSENIC-TCLP MG/L	5	**0.017 J B**	**0.014 J B**	**0.015 J B**	**0.017 J B**	**0.016 J B**	**0.017 J B**	**0.014 J B**	**0.013 J B**	**0.015 J B**	**0.017 J B**	**0.014 J B**
METALS (TCLP)	BARIUM-TCLP MG/L	100	**1.1 J B**	**0.91 J B**	**1.4 J B**	**0.86 J B**	**0.71 J B**	**0.77 J B**	**1 J B**	**0.9 J B**	**1 J B**	**1.1 J B**	**0.91 J B**
METALS (TCLP)	CADMIUM-TCLP MG/L	1	**0.002 J**	**0.0025 J**	**0.0012 J**	**0.0034 J B**	**0.0032 J B**	**0.0037 J B**	**0.0022 J**	**0.0025 J**	**0.0029 J**	**0.002 J**	**0.0025 J**
METALS (TCLP)	CHROMIUM-TCLP MG/L	5	**0.0052 J B**	**0.0086 J B**	**0.0048 J B**	**0.0062 J B**	**0.0048 J B**	**0.0062 J B**	**0.0016 J B**	**0.0035 J B**	**0.0034 J B**	**0.0052 J B**	**0.0086 J B**
METALS (TCLP)	LEAD-TCLP MG/L	5	**0.0097 J B**	**0.0058 J B**	**0.019 J B**	**0.019 J B**	**0.01 J B**	**0.0093 J B**	**0.016 J**	**0.017 J**	**0.019 J**	**0.0097 J B**	**0.0058 J B**
METALS (TCLP)	MERCURY-TCLP MG/L	0.2	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
METALS (TCLP)	SELENIUM-TCLP MG/L	1	**0.0075 J B**	**0.0067 J B**	**0.0077 J B**	**0.01 J B**	**0.0078 J B**	**0.011 J B**	**0.0052 J**	0.25 U	**0.0041 J**	**0.0075 J B**	**0.0067 J B**
METALS (TCLP)	SILVER-TCLP MG/L	5	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
SEMI-VOLATILE (TCLP)	1,4-DICHLOROBENZENE-TCLP MG/L	7.5	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U
SEMI-VOLATILE (TCLP)	2,4,5-TRICHLOROPHENOL-TCLP MG/L	400	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U
SEMI-VOLATILE (TCLP)	2,4,6-TRICHLOROPHENOL-TCLP MG/L	2	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U
SEMI-VOLATILE (TCLP)	2,4-DINITROTOLUENE-TCLP MG/L	0.13	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U
SEMI-VOLATILE (TCLP)	2-METHYLPHENOL-TCLP MG/L	200[4]	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U
SEMI-VOLATILE (TCLP)	**3 & 4 METHYLPHENOL-TCLP MG/L**	200[4]	**0.0012 J**	**0.0025 J**	0.004 U	0.004 U	**0.0022 J**	**0.0012 J**	**0.0034 J**	**0.006**	**0.0053**	**0.0012 J**	**0.0025 J**
SEMI-VOLATILE (TCLP)	HEXACHLOROBENZENE-TCLP MG/L	0.13	0.0008 U	0.0008 U	0.0008 U	0.0008 U	0.0008 U	0.0008 U	0.0008 U	0.0008 U	0.0008 U	0.0008 U	0.0008 U
SEMI-VOLATILE (TCLP)	HEXACHLOROBUTADIENE-TCLP MG/L	0.5	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U
SEMI-VOLATILE (TCLP)	HEXACHLOROETHANE-TCLP MG/L	3	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U
SEMI-VOLATILE (TCLP)	NITROBENZENE-TCLP MG/L	2	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U
SEMI-VOLATILE (TCLP)	PENTACHLOROPHENOL-TCLP MG/L	100	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U
SEMI-VOLATILE (TCLP)	PYRIDINE-TCLP MG/L	5	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U
VOLATILES (TCLP)	1,1-DICHLOROETHENE-TCLP MG/L	0.7	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES (TCLP)	1,2-DICHLOROETHANE-TCLP MG/L	0.5	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES (TCLP)	**2-BUTANONE (MEK)-TCLP MG/L**	200	0.25 U	**0.029 J**	**0.04 J**	**0.056 J**	**0.034 J**	**0.038 J**	0.25 U	0.25 U	0.25 U	0.25 U	**0.029 J**
VOLATILES (TCLP)	BENZENE-TCLP MG/L	0.5	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES (TCLP)	CARBON TETRACHLORIDE-TCLP MG/L	0.5	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES (TCLP)	CHLOROBENZENE-TCLP MG/L	100	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES (TCLP)	CHLOROFORM-TCLP MG/L	6	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES (TCLP)	TETRACHLOROETHENE-TCLP MG/L	0.7	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES (TCLP)	TRICHLOROETHENE-TCLP MG/L	0.5	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES (TCLP)	VINYL CHLORIDE-TCLP MG/L	0.2	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U

Bold = detected concentration

CNF = Contains no free liquids

J = Estimated due to data quality issue (e.g., positive concentration detected below the laboratory reporting limit)

U = Nondetect at the reported value

[1] As presented in 40 CFR Part 261 Subpart C.

[2] According to EPA's Rebuttable Presumption Rule (40 CFR §261.3(a)(2)(v)) any used oil containing 1000 ppm of total halogens is assumed to have been mixed with hazardous waste and consequently the entire used oil/waste mixture constitutes hazardous waste. However, the rule also allows generators to rebut the presumption through further demonstrations.

[3] A specified amount of material is placed in a paint filter. If any portion of the material passes through and drops from the filter within the 5 minute test period, the material is deemed to contain free liquids. Waste containing free liquids may be placed in a landfill if the landfill has a liner and leachate collection and removal system that meet the requirements of § 264.301(a) or the liquid waste or waste containing free liquids is treated or stabilized, chemically or physically (e.g., by mixing with a sorbent solid), so that free liquids are no longer present.

[4] If o-, m-, and p-Cresol concentrations cannot be differentiated, the total cresol (D026) concentration is used. The regulatory level of total cresol is 200 mg/l.

Canton Drop Forge

Project No. 216406.0000

Waste Characterization Data Summary (Pond 1 Biocell Material)

ANAL_GRP	Chemical	240-44979-3 P1-BC-03 12/3/2014	240-45132-1 P1-BC-04 12/5/2014	240-45132-2 P1-BC-05 12/5/2014	240-45132-3 P1-BC-06 12/5/2014	240-45490-1 P1-BC-07 12/15/2014	240-45490-2 P1-BC-08 12/15/2014	240-45490-3 P1-BC-09 12/15/2014	240-45757-1 P1-BC-10 12/19/2014	240-45757-2 P1-BC-11 12/19/2014	240-45757-3 P1-BC-12 12/19/2014
GENERAL CHEM	CORROSIVITY BY PH SU	8.71	10.3	9.31	11.4	9.19	8.92	9.14	9.27	8.83	8.67
GENERAL CHEM	FLASHPOINT DEGREES F	>200	>200	>200	>200	>200	>200	>200	>200	>200	>200
GENERAL CHEM	FREE LIQUID NONE	CNF	CNF	CNF	CNF	CNF	CNF	CNF	CNF	CNF	CNF
GENERAL CHEM	HALOGENS, EXTRACTABLE ORGANIC MG/KG	220 U	220 U	220 U	220 U	220 U	220 U	220 U	230 U	220 U	210 U
METALS (TCLP)	ARSENIC-TCLP MG/L	**0.015 J B**	**0.017 J B**	**0.016 J B**	**0.017 J B**	**0.014 J B**	**0.013 J B**	0.015 J B	0.020 J B	0.019 J B	0.015 J B
METALS (TCLP)	BARIUM-TCLP MG/L	**1.4 J B**	**0.86 J B**	**0.71 J B**	**0.77 J B**	**1 J B**	**0.9 J B**	1 J B	0.96 J B	1.2 J B	1.2 J B
METALS (TCLP)	CADMIUM-TCLP MG/L	**0.0012 J**	**0.0034 J B**	**0.0032 J B**	**0.0037 J B**	**0.0022 J**	**0.0025 J**	0.0029 J	0.0019 J	0.0035 J	0.0020 J
METALS (TCLP)	CHROMIUM-TCLP MG/L	**0.0048 J B**	**0.0062 J B**	**0.0048 J B**	**0.0062 J B**	**0.0016 J B**	**0.0035 J B**	0.0034 J B	0.0044 J B	0.0051 J B	0.0033 J B
METALS (TCLP)	LEAD-TCLP MG/L	**0.019 J B**	**0.019 J B**	**0.01 J B**	**0.0093 J B**	**0.016 J**	**0.017 J**	0.019 J	0.014 J	0.015 J	0.085 J
METALS (TCLP)	MERCURY-TCLP MG/L	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.0020 U	0.0020 U	0.0020 U
METALS (TCLP)	SELENIUM-TCLP MG/L	**0.0077 J B**	**0.01 J B**	**0.0078 J B**	**0.011 J B**	**0.0052 J**	0.25 U	0.0041 J	0.25 U	0.25 U	0.25 U
METALS (TCLP)	SILVER-TCLP MG/L	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.50 U	0.50 U	0.50 U
SEMI-VOLATILE (TCLP)	1,4-DICHLOROBENZENE-TCLP MG/L	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.0040 U	0.0040 U	0.0040 U
SEMI-VOLATILE (TCLP)	2,4,5-TRICHLOROPHENOL-TCLP MG/L	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.0040 U	0.0040 U	0.0040 U
SEMI-VOLATILE (TCLP)	2,4,6-TRICHLOROPHENOL-TCLP MG/L	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.0040 U	0.0040 U	0.0040 U
SEMI-VOLATILE (TCLP)	2,4-DINITROTOLUENE-TCLP MG/L	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.0040 U	0.0040 U	0.0040 U
SEMI-VOLATILE (TCLP)	2-METHYLPHENOL-TCLP MG/L	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.0040 U	0.0040 U	0.0040 U
SEMI-VOLATILE (TCLP)	**3 & 4 METHYLPHENOL-TCLP MG/L**	0.004 U	0.004 U	**0.0022 J**	**0.0012 J**	**0.0034 J**	**0.006**	**0.0053**	**0.0029 J**	**0.0022 J**	0.0040 U
SEMI-VOLATILE (TCLP)	HEXACHLOROBENZENE-TCLP MG/L	0.0008 U	0.0008 U	0.0008 U	0.0008 U	0.0008 U	0.0008 U	0.0008 U	0.00080 U	0.00080 U	0.00080 U
SEMI-VOLATILE (TCLP)	HEXACHLOROBUTADIENE-TCLP MG/L	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.0040 U	0.0040 U	0.0040 U
SEMI-VOLATILE (TCLP)	HEXACHLOROETHANE-TCLP MG/L	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.0040 U	0.0040 U	0.0040 U
SEMI-VOLATILE (TCLP)	NITROBENZENE-TCLP MG/L	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.0040 U	0.0040 U	0.0040 U
SEMI-VOLATILE (TCLP)	PENTACHLOROPHENOL-TCLP MG/L	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.0040 U	0.0040 U	0.0040 U
SEMI-VOLATILE (TCLP)	PYRIDINE-TCLP MG/L	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.0040 U	0.0040 U	0.0040 U
VOLATILES (TCLP)	1,1-DICHLOROETHENE-TCLP MG/L	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES (TCLP)	1,2-DICHLOROETHANE-TCLP MG/L	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES (TCLP)	**2-BUTANONE (MEK)-TCLP MG/L**	**0.04 J**	**0.056 J**	**0.034 J**	**0.038 J**	0.25 U	0.25 U	0.25 U	0.25 U	0.25 U	0.25 U
VOLATILES (TCLP)	BENZENE-TCLP MG/L	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES (TCLP)	CARBON TETRACHLORIDE-TCLP MG/L	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES (TCLP)	CHLOROBENZENE-TCLP MG/L	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES (TCLP)	CHLOROFORM-TCLP MG/L	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES (TCLP)	TETRACHLOROETHENE-TCLP MG/L	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES (TCLP)	TRICHLOROETHENE-TCLP MG/L	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES (TCLP)	VINYL CHLORIDE-TCLP MG/L	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U

Bold = detected concentration

CNF = Contains no free liquids

J = Estimated due to data quality issue (e.g., positiv

U = Nondetect at the reported value

[1] As presented in 40 CFR Part 261 Subpart C.

[2] According to EPA's Rebuttable Presumption Rule (40 CFR §261.3(a)(2)(v)) any waste. However, the rule also allows generators to rebut the presumption thro

[3] A specified amount of material is placed in a paint filter. If any portion of the landfill if the landfill has a liner and leachate collection and removal system that that free liquids are no longer present.

[4] If o-, m-, and p-Cresol concentrations cannot be differentiated, the total creso

BILLING
BW #
DATE
RETRIEVED

RELEASED
DATE 08/09/2018
RIN #
INITIALS JFC

ATTACHMENT 2

WASTE REMOVAL DISPOSAL DOCUMENTATION

RELEASED
DATE 08/09/2012
RIN #
INITIALS

Detail Customer Activity Report

All Ticket Types | December 01, 2014 to December 16, 2014 | All Facilities

History and Waiting | Specific Customer: 333341

333341- CANTON DROP FORGE

Ticket Date	Facility & Ticket	Contract	Truck #	Container	Material	Billing Quantity	
12/08/2014	I 01	1014430 36841420467	J53		SW-CONT SOIL	14.88	TN
12/08/2014	I 01	1014437 36841420467	J55		SW-CONT SOIL	16.38	TN
12/08/2014	I 01	1014453 36841420467	J55		SW-CONT SOIL	22.36	TN
12/08/2014	I 01	1014454 36841420467	J53		SW-CONT SOIL	20.56	TN
12/08/2014	I 01	1014478 36841420467	J55		SW-CONT SOIL	22.96	TN
12/08/2014	I 01	1014481 36841420467	J53		SW-CONT SOIL	19.84	TN
12/08/2014	I 01	1014523 36841420467	J55		SW-CONT SOIL	19.14	TN
12/08/2014	I 01	1014539 36841420467	J53		SW-CONT SOIL	17.35	TN
12/08/2014	I 01	1014559 36841420467	J55		SW-CONT SOIL	18.35	TN
12/08/2014	I 01	1014582 36841420467	J53		SW-CONT SOIL	18.78	TN
12/08/2014	I 01	1014600 36841420467	J55		SW-CONT SOIL	20.40	TN
12/09/2014	I 01	1014661 36841420467	J53		SW-CONT SOIL	16.44	TN
12/09/2014	I 01	1014662 36841420467	J55		SW-CONT SOIL	15.82	TN
12/09/2014	I 01	1014687 36841420467	J61		SW-CONT SOIL	14.53	TN
12/09/2014	I 01	1014695 36841420467	J55		SW-CONT SOIL	17.48	TN
12/09/2014	I 01	1014709 36841420467	J61		SW-CONT SOIL	15.01	TN
12/09/2014	I 01	1014712 36841420467	J53		SW-CONT SOIL	17.48	TN
12/11/2014	I 01	1015111 36841420467	J87		SW-CONT SOIL	15.53	TN
12/11/2014	I 01	1015136 36841420467	J87		SW-CONT SOIL	17.42	TN
12/11/2014	I 01	1015151 36841420467	J87		SW-CONT SOIL	18.53	TN
12/11/2014	I 01	1015164 36841420467	J87		SW-CONT SOIL	14.96	TN
12/11/2014	I 01	1015221 36841420467	J87		SW-CONT SOIL	18.94	TN
12/11/2014	I 01	1015246 36841420467	J87		SW-CONT SOIL	18.09	TN
12/15/2014	I 01	1015529 36841420467	J87		SW-CONT SOIL	17.43	TN
12/15/2014	I 01	1015530 36841420467	J55		SW-CONT SOIL	18.95	TN
12/15/2014	I 01	1015536 36841420467	J54		SW-CONT SOIL	15.15	TN
12/15/2014	I 01	1015546 36841420467	J53		SW-CONT SOIL	18.16	TN
12/15/2014	I 01	1015549 36841420467	J87		SW-CONT SOIL	19.75	TN
12/15/2014	I 01	1015551 36841420467	J55		SW-CONT SOIL	18.42	TN
12/15/2014	I 01	1015575 36841420467	J53		SW-CONT SOIL	20.38	TN
12/15/2014	I 01	1015577 36841420467	J87		SW-CONT SOIL	17.13	TN
12/15/2014	I 01	1015580 36841420467	J55		SW-CONT SOIL	20.19	TN
12/15/2014	I 01	1015611 36841420467	J87		SW-CONT SOIL	20.11	TN
12/15/2014	I 01	1015612 36841420467	J53		SW-CONT SOIL	17.97	TN
12/15/2014	I 01	1015613 36841420467	J55		SW-CONT SOIL	19.26	TN
12/15/2014	I 01	1015643 36841420467	J87		SW-CONT SOIL	19.42	TN
12/15/2014	I 01	1015648 36841420467	J55		SW-CONT SOIL	18.20	TN
12/15/2014	I 01	1015672 36841420467	J54		SW-CONT SOIL	15.25	TN
12/15/2014	I 01	1015684 36841420467	J87		SW-CONT SOIL	19.09	TN
12/15/2014	I 01	1015690 36841420467	J55		SW-CONT SOIL	17.22	TN

RECEIVED

RELEASED
DATE 08/05/2018
BIN #
INITIALS

Detail Customer Activity Report

All Ticket Types

December 01, 2014 to December 16, 2014

All Facilities

History and Waiting

Specific Customer: 333341

RELEASED
DATE 08/09/2018
RIN #
INITIALS David Chadwick's

333341- CANTON DROP FORGE

Ticket Date	Facility & Ticket		Contract	Truck #	Container	Material	Billing Quantity	
12/15/2014	I	01	1015716 36841420467	J54		SW-CONT SOIL	16.48	TN
12/15/2014	I	01	1015724 36841420467	J87		SW-CONT SOIL	18.94	TN
12/16/2014	I	01	1015751 36841420467	J53		SW-CONT SOIL	19.40	TN
12/16/2014	I	01	1015766 36841420467	J55		SW-CONT SOIL	17.60	TN
12/16/2014	I	01	1015774 36841420467	J87		SW-CONT SOIL	16.60	TN
12/16/2014	I	01	1015775 36841420467	J54		SW-CONT SOIL	18.22	TN
12/16/2014	I	01	1015780 36841420467	J61		SW-CONT SOIL	14.83	TN
12/16/2014	I	01	1015788 36841420467	J53		SW-CONT SOIL	20.20	TN
12/16/2014	I	01	1015797 36841420467	J55		SW-CONT SOIL	18.60	TN
12/16/2014	I	01	1015799 36841420467	J87		SW-CONT SOIL	17.31	TN
12/16/2014	I	01	1015801 36841420467	J61		SW-CONT SOIL	15.25	TN
12/16/2014	I	01	1015808 36841420467	J54		SW-CONT SOIL	18.79	TN
12/16/2014	I	01	1015810 36841420467	J53		SW-CONT SOIL	19.96	TN
12/16/2014	I	01	1015831 36841420467	J55		SW-CONT SOIL	19.80	TN
12/16/2014	I	01	1015833 36841420467	J87		SW-CONT SOIL	19.42	TN
12/16/2014	I	01	1015834 36841420467	J61		SW-CONT SOIL	14.27	TN
12/16/2014	I	01	1015840 36841420467	J54		SW-CONT SOIL	17.81	TN
12/16/2014	I	01	1015845 36841420467	J53		SW-CONT SOIL	19.41	TN
12/16/2014	I	01	1015862 36841420467	J61		SW-CONT SOIL	13.13	TN
12/16/2014	I	01	1015876 36841420467	J54		SW-CONT SOIL	15.89	TN
12/16/2014	I	01	1015877 36841420467	J87		SW-CONT SOIL	19.38	TN
12/16/2014	I	01	1015878 36841420467	J55		SW-CONT SOIL	16.48	TN
12/16/2014	I	01	1015879 36841420467	J53		SW-CONT SOIL	21.32	TN
12/16/2014	I	01	1015907 36841420467	J54		SW-CONT SOIL	16.75	TN
12/16/2014	I	01	1015911 36841420467	J61		SW-CONT SOIL	17.82	TN
12/16/2014	I	01	1015918 36841420467	J55		SW-CONT SOIL	20.80	TN
12/16/2014	I	01	1015920 36841420467	J53		SW-CONT SOIL	20.17	TN
12/16/2014	I	01	1015956 36841420467	J61		SW-CONT SOIL	18.31	TN
12/16/2014	I	01	1015958 36841420467	J54		SW-CONT SOIL	17.01	TN
12/16/2014	I	01	1015967 36841420467	J53		SW-CONT SOIL	16.26	TN
12/16/2014	I	01	1015969 36841420467	J55		SW-CONT SOIL	21.09	TN

Material Summary	Weight Inbound	Weight Outbound	Volume Inbound	Volume Outbound		Count Inbound	Count Outbound	Billing Quantity
VG - SW-CONT SOIL	1,280.61	0.00 TN	0.00	0.00	Y	0.00	0.00	1,280.61 TN

Activity by Customer and Material (with Weight In/Out)

Date Range: 12/17/2014 to 12/17/2014

Customer Range: 333341 to 333341

Details

	Date	Ticket #		Inbound Weight (Tons)	Inbound Volume	UOM	Outbound Weight (Tons)	Outbound Volume	UOM	Count Inboun	Count Outbound	Billing Qty	UOM
Cust # - Name: 333341 - CANTON DROP FORGE													
	12/17/2014	1016011	01	19.19	0.00		0.00	0.00				19.19	
	12/17/2014	1016012	01	16.85	0.00		0.00	0.00				16.85	
	12/17/2014	1016015	01	21.68	0.00		0.00	0.00				21.68	
	12/17/2014	1016026	01	16.49	0.00		0.00	0.00				16.49	
	12/17/2014	1016035	01	20.23	0.00		0.00	0.00				20.23	
	12/17/2014	1016039	01	17.99	0.00		0.00	0.00				17.99	
	12/17/2014	1016041	01	22.84	0.00		0.00	0.00				22.84	
	12/17/2014	1016057	01	17.54	0.00		0.00	0.00				17.54	
	12/17/2014	1016062	01	21.27	0.00		0.00	0.00				21.27	
	12/17/2014	1016064	01	18.85	0.00		0.00	0.00				18.85	
	12/17/2014	1016066	01	18.11	0.00		0.00	0.00				18.11	
	12/17/2014	1016070	01	20.42	0.00		0.00	0.00				20.42	
	12/17/2014	1016088	01	16.83	0.00		0.00	0.00				16.83	
	12/17/2014	1016089	01	15.63	0.00		0.00	0.00				15.63	
	12/17/2014	1016092	01	17.36	0.00		0.00	0.00				17.36	
	12/17/2014	1016093	01	17.94	0.00		0.00	0.00				17.94	
	12/17/2014	1016120	01	20.17	0.00		0.00	0.00				20.17	
	12/17/2014	1016121	01	20.78	0.00		0.00	0.00				20.78	
	12/17/2014	1016140	01	18.60	0.00		0.00	0.00				18.60	
	12/17/2014	1016141	01	19.87	0.00		0.00	0.00				19.87	
	12/17/2014	1016142	01	19.01	0.00		0.00	0.00				19.01	
	12/17/2014	1016143	01	17.51	0.00		0.00	0.00				17.51	
	12/17/2014	1016178	01	21.15	0.00		0.00	0.00				21.15	
	12/17/2014	1016181	01	20.46	0.00		0.00	0.00				20.46	
	12/17/2014	1016186	01	18.43	0.00		0.00	0.00				18.43	
	12/17/2014	1016195	01	16.56	0.00		0.00	0.00				16.56	
	12/17/2014	1016197	01	21.18	0.00		0.00	0.00				21.18	
	12/17/2014	1016198	01	20.10	0.00		0.00	0.00				20.10	
	12/17/2014	1016220	01	19.69	0.00		0.00	0.00				19.69	
	12/17/2014	1016222	01	18.65	0.00		0.00	0.00				18.65	
	12/17/2014	1016224	01	17.00	0.00		0.00	0.00				17.00	
VG - SW-CONT SOIL				588.38	0.00	YD	0.00	0.00				588.38	TN
	Totals:			**588.38**	**0.00**		**0.00**	**0.00**				**588.38**	
	Grand Totals:			**588.38**	**0.00**		**0.00**	**0.00**				**588.38**	

RELEASED
DATE 08/05/2018
RIN #
INITIALS

Activity by Customer and Material (with Weight In/Out)

Date Range: 12/18/2014 to 12/18/2014

Customer Range: 333341 to 333341

Details

RELEASED
DATE 08/07/2018
RIN #
INITIALS

	Date	Ticket #		Inbound Weight (Tons)	Inbound Volume	UOM	Outbound Weight (Tons)	Outbound Volume	UOM	Count Inboun	Count Outbound	Billing Qty
Cust # - Name: 333341 - CANTON DROP FORGE												
	12/18/2014	1016254	01	16.21	0.00		0.00	0.00				16.21
	12/18/2014	1016255	01	18.82	0.00		0.00	0.00				18.82
	12/18/2014	1016260	01	21.12	0.00		0.00	0.00				21.12
	12/18/2014	1016262	01	20.34	0.00		0.00	0.00				20.34
	12/18/2014	1016276	01	21.43	0.00		0.00	0.00				21.43
	12/18/2014	1016277	01	21.61	0.00		0.00	0.00				21.61
	12/18/2014	1016283	01	20.75	0.00		0.00	0.00				20.75
	12/18/2014	1016289	01	22.31	0.00		0.00	0.00				22.31
	12/18/2014	1016296	01	17.46	0.00		0.00	0.00				17.46
	12/18/2014	1016301	01	17.61	0.00		0.00	0.00				17.61
	12/18/2014	1016303	01	15.49	0.00		0.00	0.00				15.49
	12/18/2014	1016311	01	19.45	0.00		0.00	0.00				19.45
	12/18/2014	1016328	01	17.80	0.00		0.00	0.00				17.80
	12/18/2014	1016342	01	20.10	0.00		0.00	0.00				20.10
	12/18/2014	1016344	01	19.33	0.00		0.00	0.00				19.33
	12/18/2014	1016351	01	17.24	0.00		0.00	0.00				17.24
	12/18/2014	1016354	01	18.83	0.00		0.00	0.00				18.83
	12/18/2014	1016373	01	21.79	0.00		0.00	0.00				21.79
	12/18/2014	1016379	01	19.46	0.00		0.00	0.00				19.46
	12/18/2014	1016392	01	16.29	0.00		0.00	0.00				16.29
	12/18/2014	1016397	01	18.12	0.00		0.00	0.00				18.12
	12/18/2014	1016420	01	19.10	0.00		0.00	0.00				19.10
	12/18/2014	1016424	01	20.58	0.00		0.00	0.00				20.58
	12/18/2014	1016429	01	15.42	0.00		0.00	0.00				15.42
	12/18/2014	1016433	01	20.18	0.00		0.00	0.00				20.18
	12/18/2014	1016449	01	16.95	0.00		0.00	0.00				16.95
	12/18/2014	1016450	01	19.14	0.00		0.00	0.00				19.14
	12/18/2014	1016451	01	16.61	0.00		0.00	0.00				16.61
VG - SW-CONT SOIL				529.54	0.00	YD	0.00	0.00	YD			529.54
	Totals:			**529.54**	**0.00**		**0.00**	**0.00**				**529.54**
	Grand Totals:			**529.54**	**0.00**		**0.00**	**0.00**				**529.54**
												529.54

Activity by Customer and Material (with Weight In/Out)

Date Range: 12/19/2014 to 12/19/2014

Customer Range: 333341 to 333341

Details

	Date	Ticket #		Inbound Weight (Tons)	Inbound Volume	UOM	Outbound Weight (Tons)	Outbound Volume	UOM	Count Inboun	Count Outbound	Billing Qty	UOM
Cust # - Name: 333341 - CANTON DROP FORGE													
	12/19/2014	1016478	01	18.39	0.00		0.00	0.00				18.39	
	12/19/2014	1016479	01	19.10	0.00		0.00	0.00				19.10	
	12/19/2014	1016480	01	20.04	0.00		0.00	0.00				20.04	
	12/19/2014	1016483	01	18.69	0.00		0.00	0.00				18.69	
	12/19/2014	1016484	01	17.59	0.00		0.00	0.00				17.59	
	12/19/2014	1016504	01	21.16	0.00		0.00	0.00				21.16	
	12/19/2014	1016505	01	18.97	0.00		0.00	0.00				18.97	
	12/19/2014	1016506	01	20.16	0.00		0.00	0.00				20.16	
	12/19/2014	1016507	01	16.00	0.00		0.00	0.00				16.00	
	12/19/2014	1016509	01	14.55	0.00		0.00	0.00				14.55	
	12/19/2014	1016522	01	20.12	0.00		0.00	0.00				20.12	
	12/19/2014	1016524	01	19.58	0.00		0.00	0.00				19.58	
	12/19/2014	1016525	01	19.08	0.00		0.00	0.00				19.08	
	12/19/2014	1016529	01	15.35	0.00		0.00	0.00				15.35	
	12/19/2014	1016531	01	15.81	0.00		0.00	0.00				15.81	
	12/19/2014	1016549	01	20.83	0.00		0.00	0.00				20.83	
	12/19/2014	1016550	01	20.46	0.00		0.00	0.00				20.46	
	12/19/2014	1016563	01	16.88	0.00		0.00	0.00				16.88	
	12/19/2014	1016568	01	18.81	0.00		0.00	0.00				18.81	
	12/19/2014	1016572	01	20.34	0.00		0.00	0.00				20.34	
	12/19/2014	1016577	01	16.40	0.00		0.00	0.00				16.40	
	12/19/2014	1016588	01	16.96	0.00		0.00	0.00				16.96	
	12/19/2014	1016598	01	16.00	0.00		0.00	0.00				16.00	
	12/19/2014	1016601	01	14.39	0.00		0.00	0.00				14.39	
	12/19/2014	1016607	01	22.44	0.00		0.00	0.00				22.44	
	12/19/2014	1016630	01	22.28	0.00		0.00	0.00				22.28	
	12/19/2014	1016632	01	18.42	0.00		0.00	0.00				18.42	
	12/19/2014	1016635	01	19.07	0.00		0.00	0.00				19.07	
	12/19/2014	1016638	01	19.61	0.00		0.00	0.00				19.61	
	12/19/2014	1016643	01	21.23	0.00		0.00	0.00				21.23	
	12/19/2014	1016657	01	20.41	0.00		0.00	0.00				20.41	
	12/19/2014	1016658	01	16.85	0.00		0.00	0.00				16.85	
VG - SW-CONT SOIL				595.97	0.00	YD	0.00	0.00	YD	0.00	0.00	595.97	TN
	Totals:			**595.97**	**0.00**		**0.00**	**0.00**		**0.00**	**0.00**	**595.97**	
	Grand Totals:			**595.97**	**0.00**		**0.00**	**0.00**		**0.00**	**0.00**	**595.97**	
												595.97	TN

RELEASED
DATE 08/05/2018
RIN #
INITIALS

Activity by Customer and Material (with Weight In/Out)

Date Range: 12/22/2014 to 12/22/2014

Customer Range: 333341 to 333341

Details

RELEASED
DATE 08/05/2018
RIN #
INITIALS

Cust # - Name: 333341 - CANTON DROP FORGE

	Date	Ticket #		Inbound Weight (Tons)	Inbound Volume	UOM	Outbound Weight (Tons)	Outbound Volume	UOM	Count	Billing Qty	UOM
	12/22/2014	1016713	01	16.11	0.00		0.00	0.00			16.11	
	12/22/2014	1016719	01	17.24	0.00		0.00	0.00			17.24	
	12/22/2014	1016730	01	18.96	0.00		0.00	0.00			18.96	
	12/22/2014	1016731	01	16.91	0.00		0.00	0.00			16.91	
	12/22/2014	1016739	01	18.79	0.00		0.00	0.00			18.79	
	12/22/2014	1016744	01	20.35	0.00		0.00	0.00			20.35	
	12/22/2014	1016756	01	19.29	0.00		0.00	0.00			19.29	
	12/22/2014	1016757	01	18.11	0.00		0.00	0.00			18.11	
	12/22/2014	1016760	01	18.93	0.00		0.00	0.00			18.93	
	12/22/2014	1016764	01	14.42	0.00		0.00	0.00			14.42	
	12/22/2014	1016769	01	21.05	0.00		0.00	0.00			21.05	
	12/22/2014	1016787	01	19.61	0.00		0.00	0.00			19.61	
	12/22/2014	1016792	01	17.66	0.00		0.00	0.00			17.66	
	12/22/2014	1016793	01	14.01	0.00		0.00	0.00			14.01	
	12/22/2014	1016795	01	16.67	0.00		0.00	0.00			16.67	
	12/22/2014	1016813	01	14.89	0.00		0.00	0.00			14.89	
	12/22/2014	1016826	01	17.68	0.00		0.00	0.00			17.68	
	12/22/2014	1016828	01	19.31	0.00		0.00	0.00			19.31	
	12/22/2014	1016832	01	20.01	0.00		0.00	0.00			20.01	
	12/22/2014	1016850	01	13.49	0.00		0.00	0.00			13.49	
	12/22/2014	1016852	01	13.86	0.00		0.00	0.00			13.86	
	12/22/2014	1016875	01	16.20	0.00		0.00	0.00			16.20	
	12/22/2014	1016877	01	14.52	0.00		0.00	0.00			14.52	
	12/22/2014	1016882	01	13.58	0.00		0.00	0.00			13.58	
	12/22/2014	1016888	01	19.13	0.00		0.00	0.00			19.13	
	12/22/2014	1016894	01	16.00	0.00		0.00	0.00			16.00	
	12/22/2014	1016912	01	18.25	0.00		0.00	0.00			18.25	
	12/22/2014	1016913	01	16.97	0.00		0.00	0.00			16.97	
	12/22/2014	1016915	01	15.49	0.00		0.00	0.00			15.49	
	12/22/2014	1016917	01	18.14	0.00		0.00	0.00			18.14	
VG - SW-CONT SOIL				515.63	0.00	YD	0.00	0.00	YD		515.63	TN
	Totals:			**515.63**	**0.00**		**0.00**	**0.00**			**515.63**	
	Grand Totals:			**515.63**	**0.00**		**0.00**	**0.00**			**515.63**	
											515.63	TN

Activity by Customer and Material (with Weight In/Out)

Date Range: 12/23/2014 to 12/23/2014

Customer Range: 333341 to 333341

Details

	Date	Ticket #		Inbound Weight (Tons)	Inbound Volume	UOM	Outbound Weight (Tons)	Outbound Volume	UOM	Count Inboun	Count Outbound	Billing Qty	UOM
Cust # - Name: 333341 - CANTON DROP FORGE													
	12/23/2014	1016944	01	14.06	0.00		0.00	0.00				14.06	
	12/23/2014	1016948	01	18.18	0.00		0.00	0.00				18.18	
	12/23/2014	1016949	01	18.80	0.00		0.00	0.00				18.80	
	12/23/2014	1016953	01	18.79	0.00		0.00	0.00				18.79	
	12/23/2014	1016954	01	18.23	0.00		0.00	0.00				18.23	
	12/23/2014	1016967	01	16.80	0.00		0.00	0.00				16.80	
	12/23/2014	1016970	01	17.01	0.00		0.00	0.00				17.01	
	12/23/2014	1016971	01	18.74	0.00		0.00	0.00				18.74	
	12/23/2014	1016975	01	18.36	0.00		0.00	0.00				18.36	
	12/23/2014	1016981	01	17.85	0.00		0.00	0.00				17.85	
	12/23/2014	1016986	01	16.10	0.00		0.00	0.00				16.10	
	12/23/2014	1016988	01	19.32	0.00		0.00	0.00				19.32	
	12/23/2014	1016992	01	18.25	0.00		0.00	0.00				18.25	
	12/23/2014	1016995	01	18.35	0.00		0.00	0.00				18.35	
	12/23/2014	1017007	01	17.39	0.00		0.00	0.00				17.39	
	12/23/2014	1017008	01	15.67	0.00		0.00	0.00				15.67	
	12/23/2014	1017026	01	16.71	0.00		0.00	0.00				16.71	
	12/23/2014	1017028	01	18.27	0.00		0.00	0.00				18.27	
	12/23/2014	1017034	01	17.73	0.00		0.00	0.00				17.73	
	12/23/2014	1017049	01	19.55	0.00		0.00	0.00				19.55	
	12/23/2014	1017051	01	18.79	0.00		0.00	0.00				18.79	
	12/23/2014	1017069	01	18.80	0.00		0.00	0.00				18.80	
	12/23/2014	1017080	01	20.97	0.00		0.00	0.00				20.97	
	12/23/2014	1017086	01	16.03	0.00		0.00	0.00				16.03	
	12/23/2014	1017103	01	16.35	0.00		0.00	0.00				16.35	
	12/23/2014	1017107	01	13.48	0.00		0.00	0.00				13.48	
	12/23/2014	1017117	01	17.35	0.00		0.00	0.00				17.35	
	12/23/2014	1017120	01	16.68	0.00		0.00	0.00				16.68	
	12/23/2014	1017122	01	17.60	0.00		0.00	0.00				17.60	
	12/23/2014	1017132	01	17.47	0.00		0.00	0.00				17.47	
	12/23/2014	1017134	01	14.49	0.00		0.00	0.00				14.49	
VG - SW-CONT SOIL				542.17	0.00	YD	0.00	0.00	YD			542.17	TN
	Totals:			**542.17**	**0.00**		**0.00**	**0.00**				**542.17**	
	Grand Totals:			**542.17**	**0.00**		**0.00**	**0.00**				**542.17**	TN

RELEASED
DATE 08/05/2018
RIN #
INITIALS

Activity by Customer and Material (with Weight In/Out)

Date Range: 12/24/2014 to 12/24/2014

Customer Range: 333341 to 333341

Details

RELEASED
DATE 08/09/2018
RIN #
INITIALS

	Date	Ticket #		Inbound Weight (Tons)	Inbound Volume	UOM	Outbound Weight (Tons)	Outbound Volume	UOM	Count Inboun	Count Outbound	Billing Qty	UOM
Cust # - Name: 333341 - CANTON DROP FORGE													
	12/24/2014	1017171	01	17.15	0.00		0.00	0.00				17.15	
	12/24/2014	1017176	01	16.18	0.00		0.00	0.00				16.18	
	12/24/2014	1017182	01	17.05	0.00		0.00	0.00				17.05	
	12/24/2014	1017184	01	17.13	0.00		0.00	0.00				17.13	
	12/24/2014	1017185	01	16.14	0.00		0.00	0.00				16.14	
	12/24/2014	1017196	01	16.39	0.00		0.00	0.00				16.39	
	12/24/2014	1017197	01	18.92	0.00		0.00	0.00				18.92	
	12/24/2014	1017201	01	16.84	0.00		0.00	0.00				16.84	
	12/24/2014	1017207	01	18.06	0.00		0.00	0.00				18.06	
	12/24/2014	1017210	01	16.83	0.00		0.00	0.00				16.83	
	12/24/2014	1017211	01	17.29	0.00		0.00	0.00				17.29	
	12/24/2014	1017212	01	21.04	0.00		0.00	0.00				21.04	
	12/24/2014	1017214	01	17.01	0.00		0.00	0.00				17.01	
	12/24/2014	1017219	01	14.50	0.00		0.00	0.00				14.50	
	12/24/2014	1017229	01	16.21	0.00		0.00	0.00				16.21	
	12/24/2014	1017230	01	17.61	0.00		0.00	0.00				17.61	
	12/24/2014	1017231	01	16.50	0.00		0.00	0.00				16.50	
	12/24/2014	1017233	01	18.25	0.00		0.00	0.00				18.25	
	12/24/2014	1017246	01	14.23	0.00		0.00	0.00				14.23	
	12/24/2014	1017258	01	17.37	0.00		0.00	0.00				17.37	
	12/24/2014	1017266	01	17.62	0.00		0.00	0.00				17.62	
	12/24/2014	1017277	01	17.14	0.00		0.00	0.00				17.14	
	12/24/2014	1017286	01	16.12	0.00		0.00	0.00				16.12	
	12/24/2014	1017298	01	14.66	0.00		0.00	0.00				14.66	
VG - SW-CONT SOIL				406.24	0.00	YD	0.00	0.00	YD	0.00	0.00	406.24	TN
	Totals:			**406.24**	**0.00**		**0.00**	**0.00**		**0.00**	**0.00**	**406.24**	
	Grand Totals:			**406.24**	**0.00**		**0.00**	**0.00**		**0.00**	**0.00**	**406.24**	
												406.24	TN

Summary by Materials (with Fees)

VG - SW-CONT SOIL				406.24	0.00		0.00	0.00				406.24	TN
	Totals:			**406.24**	**0.00**		**0.00**	**0.00**				**406.24**	
												406.24	TN

Detail Customer Activity Report

All Ticket Types

December 29, 2014 to December 29, 2014

History and Waiting

Specific Customer: 333341

333341- CANTON DROP FORGE

Ticket Date	Facility & Ticket		Contract	Truck #	Container	Material	Billing Quantity	
12/29/2014	I	01	1017608 36841420467	J87		SW-CONT SOIL	17.80	TN
12/29/2014	I	01	1017611 36841420467	J55		SW-CONT SOIL	18.11	TN
12/29/2014	I	01	1017614 36841420467	J54		SW-CONT SOIL	18.18	TN
12/29/2014	I	01	1017616 36841420467	J53		SW-CONT SOIL	18.24	TN
12/29/2014	I	01	1017617 36841420467	J61		SW-CONT SOIL	14.34	TN
12/29/2014	I	01	1017620 36841420467	J2347		SW-CONT SOIL	19.44	TN
12/29/2014	I	01	1017629 36841420467	J6716		SW-CONT SOIL	20.22	TN
12/29/2014	I	01	1017632 36841420467	J4043		SW-CONT SOIL	21.57	TN
12/29/2014	I	01	1017633 36841420467	J1448		SW-CONT SOIL	19.93	TN
12/29/2014	I	01	1017634 36841420467	J87		SW-CONT SOIL	18.12	TN
12/29/2014	I	01	1017638 36841420467	J54		SW-CONT SOIL	17.40	TN
12/29/2014	I	01	1017639 36841420467	J53		SW-CONT SOIL	18.08	TN
12/29/2014	I	01	1017640 36841420467	J61		SW-CONT SOIL	14.44	TN
12/29/2014	I	01	1017643 36841420467	J2347		SW-CONT SOIL	19.73	TN
12/29/2014	I	01	1017646 36841420467	J6716		SW-CONT SOIL	20.35	TN
12/29/2014	I	01	1017648 36841420467	J4043		SW-CONT SOIL	21.39	TN
12/29/2014	I	01	1017650 36841420467	J55		SW-CONT SOIL	18.76	TN
12/29/2014	I	01	1017653 36841420467	J1448		SW-CONT SOIL	21.46	TN
12/29/2014	I	01	1017655 36841420467	J87		SW-CONT SOIL	20.63	TN
12/29/2014	I	01	1017663 36841420467	J6412		SW-CONT SOIL	21.07	TN
12/29/2014	I	01	1017664 36841420467	J53		SW-CONT SOIL	19.88	TN
12/29/2014	I	01	1017665 36841420467	J54		SW-CONT SOIL	18.20	TN
12/29/2014	I	01	1017668 36841420467	J61		SW-CONT SOIL	15.26	TN
12/29/2014	I	01	1017669 36841420467	J2347		SW-CONT SOIL	19.81	TN
12/29/2014	I	01	1017670 36841420467	J6716		SW-CONT SOIL	21.38	TN
12/29/2014	I	01	1017674 36841420467	J4043		SW-CONT SOIL	20.00	TN
12/29/2014	I	01	1017675 36841420467	J55		SW-CONT SOIL	16.67	TN
12/29/2014	I	01	1017685 36841420467	J1448		SW-CONT SOIL	18.49	TN
12/29/2014	I	01	1017689 36841420467	J6412		SW-CONT SOIL	19.30	TN
12/29/2014	I	01	1017692 36841420467	J61		SW-CONT SOIL	14.77	TN
12/29/2014	I	01	1017708 36841420467	J87		SW-CONT SOIL	17.55	TN
12/29/2014	I	01	1017709 36841420467	J53		SW-CONT SOIL	16.58	TN
12/29/2014	I	01	1017710 36841420467	J4043		SW-CONT SOIL	18.85	TN
12/29/2014	I	01	1017712 36841420467	J54		SW-CONT SOIL	16.30	TN
12/29/2014	I	01	1017714 36841420467	J2347		SW-CONT SOIL	19.63	TN

RELEASED
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INITIALS

Ticket Date	Facility & Ticket	Contract	Truck #	Container	Material	Billing Quantity	
12/29/2014	I 01	1017715 36841420467	J6716		SW-CONT SOIL	18.73	TN
12/29/2014	I 01	1017725 36841420467	J55		SW-CONT SOIL	16.94	TN
12/29/2014	I 01	1017726 36841420467	J6412		SW-CONT SOIL	18.52	TN
12/29/2014	I 01	1017737 36841420467	J61		SW-CONT SOIL	14.39	TN
12/29/2014	I 01	1017741 36841420467	J1448		SW-CONT SOIL	18.75	TN
12/29/2014	I 01	1017744 36841420467	J87		SW-CONT SOIL	17.30	TN
12/29/2014	I 01	1017745 36841420467	J4043		SW-CONT SOIL	18.88	TN
12/29/2014	I 01	1017748 36841420467	J54		SW-CONT SOIL	18.41	TN
12/29/2014	I 01	1017752 36841420467	J2347		SW-CONT SOIL	18.19	TN
12/29/2014	I 01	1017753 36841420467	J6716		SW-CONT SOIL	20.75	TN
12/29/2014	I 01	1017762 36841420467	J55		SW-CONT SOIL	18.67	TN
12/29/2014	I 01	1017770 36841420467	J6412		SW-CONT SOIL	19.48	TN
12/29/2014	I 01	1017776 36841420467	J61		SW-CONT SOIL	16.53	TN
12/29/2014	I 01	1017780 36841420467	J1448		SW-CONT SOIL	19.62	TN
12/29/2014	I 01	1017786 36841420467	J87		SW-CONT SOIL	17.28	TN
12/29/2014	I 01	1017790 36841420467	J4043		SW-CONT SOIL	18.86	TN
12/29/2014	I 01	1017792 36841420467	J2347		SW-CONT SOIL	19.47	TN
12/29/2014	I 01	1017793 36841420467	J54		SW-CONT SOIL	17.33	TN
12/29/2014	I 01	1017794 36841420467	J6716		SW-CONT SOIL	20.12	TN
12/29/2014	I 01	1017797 36841420467	J53		SW-CONT SOIL	17.46	TN
12/29/2014	I 01	1017802 36841420467	J55		SW-CONT SOIL	19.94	TN
12/29/2014	I 01	1017810 36841420467	J6412		SW-CONT SOIL	19.15	TN
12/29/2014	I 01	1017811 36841420467	J61		SW-CONT SOIL	15.44	TN
12/29/2014	I 01	1017812 36841420467	J1448		SW-CONT SOIL	19.82	TN
12/29/2014	I 01	1017814 36841420467	J87		SW-CONT SOIL	18.42	TN
12/29/2014	I 01	1017817 36841420467	J2347		SW-CONT SOIL	17.27	TN
12/29/2014	I 01	1017819 36841420467	J4043		SW-CONT SOIL	20.22	TN
12/29/2014	I 01	1017820 36841420467	J6716		SW-CONT SOIL	18.11	TN
12/29/2014	I 01	1017821 36841420467	J54		SW-CONT SOIL	15.97	TN
12/29/2014	I 01	1017824 36841420467	J53		SW-CONT SOIL	17.68	TN

Tickets 65 Items Reported: 65

Material Summary	Weight Inbound	Weight Outbound	Volume Inbound	Volume Outbound	Count Inbound	Count Outbound	Billing Quantity
VG - SW-CONT SOIL	1,199.63	0.00 TN	0.00	0.00 Y	0.00	0.00	1,199.63 TN

RELEASED
DATE 08/09/2018
RIN #
INITIALS [illegible]

Detail Customer Activity Report

All Ticket Types

December 30, 2014 to December 30, 2014

History and Waiting

Specific Customer: 333341

333341- CANTON DROP FORGE

Ticket Date	Facility & Ticket			Contract	Truck #	Container	Material		Billing Quantity	
12/30/2014	I	01	1017854	36841420467	J2347		SW-CONT SOIL	#	18.06	TN
12/30/2014	I	01	1017855	36841420467	J4043		SW-CONT SOIL	#	18.05	TN
12/30/2014	I	01	1017858	36841420467	J87		SW-CONT SOIL	#	17.03	TN
12/30/2014	I	01	1017860	36841420467	J53		SW-CONT SOIL	#	17.20	TN
12/30/2014	I	01	1017861	36841420467	J55		SW-CONT SOIL	#	17.77	TN
12/30/2014	I	01	1017864	36841420467	J61		SW-CONT SOIL	#	13.63	TN
12/30/2014	I	01	1017865	36841420467	J54		SW-CONT SOIL	#	18.56	TN
12/30/2014	I	01	1017877	36841420467	J7848		SW-CONT SOIL	#	19.99	TN
12/30/2014	I	01	1017882	36841420467	J2347		SW-CONT SOIL	#	18.13	TN
12/30/2014	I	01	1017885	36841420467	J4043		SW-CONT SOIL	#	20.21	TN
12/30/2014	I	01	1017887	36841420467	J87		SW-CONT SOIL	#	17.23	TN
12/30/2014	I	01	1017889	36841420467	J53		SW-CONT SOIL	#	18.32	TN
12/30/2014	I	01	1017890	36841420467	J55		SW-CONT SOIL	#	18.42	TN
12/30/2014	I	01	1017891	36841420467	J61		SW-CONT SOIL	#	14.82	TN
12/30/2014	I	01	1017898	36841420467	J54		SW-CONT SOIL	#	21.45	TN
12/30/2014	I	01	1017903	36841420467	J7848		SW-CONT SOIL	#	20.34	TN
12/30/2014	I	01	1017911	36841420467	J2347		SW-CONT SOIL	#	19.48	TN
12/30/2014	I	01	1017916	36841420467	J2612		SW-CONT SOIL	#	19.40	TN
12/30/2014	I	01	1017917	36841420467	J4043		SW-CONT SOIL	#	17.57	TN
12/30/2014	I	01	1017922	36841420467	J53		SW-CONT SOIL	#	16.01	TN
12/30/2014	I	01	1017923	36841420467	J87		SW-CONT SOIL	#	16.08	TN
12/30/2014	I	01	1017925	36841420467	J61		SW-CONT SOIL	#	12.72	TN
12/30/2014	I	01	1017929	36841420467	J55		SW-CONT SOIL	#	16.36	TN
12/30/2014	I	01	1017931	36841420467	J54		SW-CONT SOIL	#	17.64	TN
12/30/2014	I	01	1017934	36841420467	J7848		SW-CONT SOIL	#	18.32	TN
12/30/2014	I	01	1017940	36841420467	J2612		SW-CONT SOIL	#	17.61	TN
12/30/2014	I	01	1017941	36841420467	J2347		SW-CONT SOIL	#	17.88	TN
12/30/2014	I	01	1017947	36841420467	J4043		SW-CONT SOIL	#	20.26	TN
12/30/2014	I	01	1017952	36841420467	J61		SW-CONT SOIL	#	14.24	TN
12/30/2014	I	01	1017964	36841420467	J87		SW-CONT SOIL	#	18.17	TN
12/30/2014	I	01	1017965	36841420467	J53		SW-CONT SOIL	#	16.59	TN
12/30/2014	I	01	1017967	36841420467	J55		SW-CONT SOIL	#	18.00	TN
12/30/2014	I	01	1017975	36841420467	J2612		SW-CONT SOIL	#	19.02	TN
12/30/2014	I	01	1017977	36841420467	J2347		SW-CONT SOIL	#	19.83	TN
12/30/2014	I	01	1017978	36841420467	J7848		SW-CONT SOIL	#	19.46	TN

RELEASED
DATE 08/05/2019
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Ticket Date	Facility & Ticket		Contract	Truck #	Container	Material		Billing Quantity	
12/30/2014	I	01	1017981 36841420467	J4043		SW-CONT SOIL	#	16.41	TN
12/30/2014	I	01	1017991 36841420467	J54		SW-CONT SOIL	#	15.61	TN
12/30/2014	I	01	1017993 36841420467	J61		SW-CONT SOIL	#	12.75	TN
12/30/2014	I	01	1018001 36841420467	J87		SW-CONT SOIL	#	17.30	TN
12/30/2014	I	01	1018003 36841420467	J53		SW-CONT SOIL	#	16.96	TN
12/30/2014	I	01	1018004 36841420467	J55		SW-CONT SOIL	#	17.77	TN
12/30/2014	I	01	1018013 36841420467	J2347		SW-CONT SOIL	#	19.93	TN
12/30/2014	I	01	1018016 36841420467	J7848		SW-CONT SOIL	#	20.11	TN
12/30/2014	I	01	1018018 36841420467	J2612		SW-CONT SOIL	#	18.57	TN
12/30/2014	I	01	1018019 36841420467	J4043		SW-CONT SOIL	#	19.31	TN
12/30/2014	I	01	1018021 36841420467	J54		SW-CONT SOIL	#	16.56	TN
12/30/2014	I	01	1018022 36841420467	J61		SW-CONT SOIL	#	15.35	TN
12/30/2014	I	01	1018024 36841420467	J87		SW-CONT SOIL	#	17.19	TN
12/30/2014	I	01	1018029 36841420467	J53		SW-CONT SOIL	#	18.62	TN
12/30/2014	I	01	1018032 36841420467	J55		SW-CONT SOIL	#	18.69	TN
12/30/2014	I	01	1018051 36841420467	J2347		SW-CONT SOIL	#	19.60	TN
12/30/2014	I	01	1018056 36841420467	J4043		SW-CONT SOIL	#	19.26	TN
12/30/2014	I	01	1018059 36841420467	J61		SW-CONT SOIL	#	14.54	TN
12/30/2014	I	01	1018060 36841420467	J87		SW-CONT SOIL	#	15.32	TN
12/30/2014	I	01	1018062 36841420467	J54		SW-CONT SOIL	#	15.49	TN
12/30/2014	I	01	1018065 36841420467	J2612		SW-CONT SOIL	#	17.64	TN
12/30/2014	I	01	1018067 36841420467	J53		SW-CONT SOIL	#	15.83	TN
12/30/2014	I	01	1018071 36841420467	J7848		SW-CONT SOIL	#	18.30	TN

Tickets 58 Items Reported: 58

Material Summary	Weight Inbound	Weight Outbound	Volume Inbound	Volume Outbound		Count Inbound	Count Outbound	Billing Quantity
VG - SW-CONT SOIL	1,020.96	0.00 TN	0.00	0.00	Y	0.00	0.00	1,020.96 TN

DATE 08/09/2018
RIN #
INITIALS

Detail Custon... Activity Report

All Ticket Types | December 31, 2014 to December 31, 2014 | All Facilities

History and Waiting | Specific Customer: 333341

333341- CANTON DROP FORGE

Ticket Date	Facility & Ticket	Contract	Truck #	Container	Material	Billing Quantity	
12/31/2014	I 01	1018116 36841420467	J6716		SW-CONT SOIL	19.23	TN
12/31/2014	I 01	1018121 36841420467	J4043		SW-CONT SOIL	19.21	TN
12/31/2014	I 01	1018123 36841420467	J61		SW-CONT SOIL	14.03	TN
12/31/2014	I 01	1018125 36841420467	J87		SW-CONT SOIL	14.38	TN
12/31/2014	I 01	1018128 36841420467	J53		SW-CONT SOIL	16.16	TN
12/31/2014	I 01	1018129 36841420467	J55		SW-CONT SOIL	17.04	TN
12/31/2014	I 01	1018132 36841420467	J54		SW-CONT SOIL	16.66	TN
12/31/2014	I 01	1018142 36841420467	J3647		SW-CONT SOIL	18.16	TN
12/31/2014	I 01	1018146 36841420467	J6716		SW-CONT SOIL	20.49	TN
12/31/2014	I 01	1018147 36841420467	J4043		SW-CONT SOIL	20.16	TN
12/31/2014	I 01	1018148 36841420467	J61		SW-CONT SOIL	13.72	TN
12/31/2014	I 01	1018155 36841420467	J87		SW-CONT SOIL	16.62	TN
12/31/2014	I 01	1018156 36841420467	J54		SW-CONT SOIL	17.29	TN
12/31/2014	I 01	1018158 36841420467	J53		SW-CONT SOIL	18.86	TN
12/31/2014	I 01	1018161 36841420467	J3647		SW-CONT SOIL	21.79	TN
12/31/2014	I 01	1018174 36841420467	J6716		SW-CONT SOIL	22.06	TN
12/31/2014	I 01	1018179 36841420467	J4043		SW-CONT SOIL	22.86	TN
12/31/2014	I 01	1018181 36841420467	J61		SW-CONT SOIL	16.26	TN
12/31/2014	I 01	1018183 36841420467	J54		SW-CONT SOIL	20.04	TN
12/31/2014	I 01	1018185 36841420467	J87		SW-CONT SOIL	20.97	TN
12/31/2014	I 01	1018186 36841420467	J53		SW-CONT SOIL	20.85	TN
12/31/2014	I 01	1018198 36841420467	J6716		SW-CONT SOIL	21.03	TN
12/31/2014	I 01	1018202 36841420467	J4043		SW-CONT SOIL	21.52	TN
12/31/2014	I 01	1018205 36841420467	J61		SW-CONT SOIL	15.86	TN
12/31/2014	I 01	1018211 36841420467	J3647		SW-CONT SOIL	21.53	TN
12/31/2014	I 01	1018218 36841420467	J87		SW-CONT SOIL	19.16	TN
12/31/2014	I 01	1018219 36841420467	J53		SW-CONT SOIL	18.36	TN
12/31/2014	I 01	1018231 36841420467	J4948		SW-CONT SOIL	20.52	TN
12/31/2014	I 01	1018240 36841420467	J54		SW-CONT SOIL	19.21	TN
12/31/2014	I 01	1018241 36841420467	J6716		SW-CONT SOIL	19.98	TN
12/31/2014	I 01	1018249 36841420467	J4043		SW-CONT SOIL	22.94	TN
12/31/2014	I 01	1018250 36841420467	J61		SW-CONT SOIL	17.08	TN

Tickets 32 Items Reported: 32

Material Summary	Weight Inbound	Weight Outbound	Volume Inbound	Volume Outbound	Count Inbound	Count Outbound	Billing Quantity
VG - SW-CONT SOIL	604.03	0.00 TN	0.00	0.00 Y	0.00	0.00	604.03 TN

RELEASED DATE 08/05/2018 RIN # INITIALS

RELEASED
DATE 08/09/2018
RIN #
INITIALS

ATTACHMENT 3

PHOTOGRAPHS
POND 1 EXCAVATION ACTIVITIES

Photograph Log

Photo 1: 12.8.14_Free Phase Water Removal

Photo 2: 12.8.14_Free Phase Water Removal

Photo 3: 12.8.14_Free Phase Water Removal

Photo 4: 12.11.14_Biocell Removal

Photo 5: 12.15.14_Biocell Removal

Photo 6: 12.15.14_Biocell Removal

RELEASED
DATE
RIN #
INITIALS

RELEASED
DATE 08/09/2018
RIN #
INITIALS Daniel Chechelnes

TRC Job No.	Photographs Taken By:	Page No.	Client:	Site Name & Address:	
216406.0000	Ryan Pulliam	1 of 4	Canton Drop Forge	4575 Southway Street SW Canton, Ohio	TRC

Photograph Log

Photo 7: 12.19.14_Biocell Removal

Photo 8: 12.19.14_Biocell Removal

Photo 9: 12.22.14_Biocell Removal

Photo 10: 12.22.14_Sidewall Clay Liner

Photo 11: 12.23.14_Sidewall Clay Liner

Photo 12: 12.23.14_Biocell Removal

RELEASED
DATE 08/09/2018
RIN #
INITIALS Jamil Chechdin

TRC Job No.	Photographs Taken By:	Page No.	Client:	Site Name & Address:
216406.0000	Ryan Pulliam	2 of 4	Canton Drop Forge	4575 Southway Street SW Canton, Ohio

Photograph Log

Photo 13: 12.23.14_Sidewall Trench

Photo 14: 12.23.14_Biocell Clay Liner Bottom

Photo 15: 12.30.14_SE Corner

Photo 16: 12.30.14_Clay Liner Visible

Photo 17: 12.30.14_Facing North Remaining Biocell

Photo 18: 12.30.14_Facing West Biocell Over Clay Liner

RELEASED
DATE 08/09/2018
RIN #
INITIALS Jeff Checholis

TRC Job No.	Photographs Taken By:	Page No.	Client:	Site Name & Address:	
216406.0000	Ryan Pulliam	3 of 4	Canton Drop Forge	4575 Southway Street SW Canton, Ohio	TRC

Photograph Log

Photo 19: 12.30.14_Clay Liner Visible

Photo 20: Pond 2 Oct 24 2014

Photo 21: Pond 2 Oct 24 2014

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TRC Job No.	Photographs Taken By:	Page No.	Client:	Site Name & Address:
216406.0000	Ryan Pulliam	4 of 4	Canton Drop Forge	4575 Southway Street SW Canton, Ohio

C.3

CANTON DROP FORGE

RELEASED
DATE 08/09/2018
RIN #
INITIALS DJF Chachakis

Monday, October 06, 2014

U.S. EPA
Fines and Penalties
Cincinnati Finance Center
P.O. Box 979077
St. Louis, MO 63197-9000

Re: Transmittal Letter - Docket No: RCRA-05-2014-0013

To Whom It May Concern,

Please find the attached cashier's check in the amount of Four Hundred Thirty One Thousand One Hundred Dollars and Zero Cents ($431,100.00) in payment of The Matter of Canton Drop Forge, Inc. Canton Ohio U.S. EPA ID No. OHD004465142, Docket number RCRA-05-2014-0013.

Regards,

Todd D. Gray
V.P. Finance – Chief Financial Officer
Canton Drop Forge, Inc.

Cc: Regional Hearing Clerk (E-19J)
Brian Kennedy (LR8J)
Eaton Weiler (C14J)

4575 Southway Street S.W. • Canton, Ohio 44706-0902 • (330) 477-4511 • FAX (330) 477-2046

THIS DOCUMENT HAS AN ARTIFICIAL WATERMARK PRINTED ON THE BACK.
THE FRONT OF THIS DOCUMENT HAS MICRO PRINT SIGNATURE LINES AND BORDER.
ABSENCE OF THESE FEATURES WILL INDICATE A COPY.

29230 - 10 6488820

FIRSTMERIT Bank

Form # 1076 Rev 5/08

9537 0001 A965846 12:17 29230 10/06/2014 10 CSCK

REMITTER CANTON DROP FORGE INC

DATE OCT 06, 2014

56-55
412

PAY FOUR HUNDRED THIRTY ONE THOUSAND ONE HUNDRED DOLLARS AND 00/$ ***431,100.00*

TO THE ORDER OF TREASURER UNITED STATES OF AMERICA

IN THE MATTER OF CANTON DROP FORGE,

INC/DOCKET #: RCRA-05-2014-0013

CASHIER'S CHECK

OFFICIAL BANK SIGNATURE

TWO SIGNATURES REQUIRED OVER $10,000.00

⑈6488820⑈ ⑆041200555⑆ ⑈5319003974⑈

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DATE 08/09/2018
RIN #
INITIALS DandPChecklist

1382 West Ninth Street, Suite 200
Cleveland, Ohio 44113

216.344.3072 PHONE
216.344.3073 FAX

www.TRCsolutions.com

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INITIALS

October 7, 2014

RCRA Branch (LR-8J)
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

Attention: Mr. Brian Kennedy

Reference: Quarterly Progress Report
Consent Agreement and Final Order (CAFO)
Docket No. RCRA-05-2014-0013
Project No. 216406.0000

Dear Mr. Kennedy:

TRC Environmental Corporation (TRC), is pleased to submit, on behalf of Canton Drop Forge (CDF), the attached Progress Report for the **Third Quarter 2014**, as agreed to in the Consent Agreement and Final Order (CAFO) journalized by the United States Environmental Protection Agency (U.S. EPA) on September 18, 2014.

Should you have any questions regarding the enclosed document, please contact me at (216) 344-3073 or via e-mail kteuscher@trcsolutions.com.

Sincerely,

TRC Environmental Corporation

Kathleen R. Teuscher
Risk Assessor/Project Manager

cc: Ed Lim – DERR CO, Ohio EPA
Don Vogel – DERR CO, Ohio EPA
Ron Shadrach – DHWM, NEDO
Eaton Weiler – U.S. EPA, Region 5
Brad Ahbe – CDF

14-1040LTR/sap

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PROGRESS REPORT – Third Quarter 2014
Canton Drop Forge, Inc.
Canton, Ohio
U.S. EPA ID No. OHD00446S142

A. IDENTIFICATION OF FACILITY AND ACTIVITY

This initial quarterly Progress Report is required by the Consent Agreement and Final Order (CAFO), effective date September 18, 2014, between the U.S. EPA Region 5 and Canton Drop Forge, Inc. (CDF). The CAFO is for the CDF Facility located at 4575 Southway Street SW, Canton, Ohio. At the request of CDF, TRC Environmental Corporation (TRC) has prepared this Progress Report. As required by Paragraph 47 of the CAFO, this Progress Report discusses the work performed during the previous quarter, the data collected, and any problems encountered. This Report also includes a progress update on tasks specified on the project schedule.

B. STATUS OF WORK AT THE FACILITY AND PROGRESS DURING THE QUARTER

The CDF Ponds Closure Plan (Closure Plan), dated September 8, 2014, was received by Ohio EPA on September 9, 2014. The Closure Plan is currently posted for public review with the comment period ending October 17, 2014. Subsequent tasks noted below are pending addressing any public comments and final approval of the final Closure Plan.

(i) The status of the removal of oil-water emulsion from Pond Nos. 1 and 2.

Construction of the upgraded oil-water separator (OWS) system has been initiated. In the interim, CDF is performing routine inspections of the existing oil-water separator to prevent discharges of oil to the ponds. Oil from the rope skimmer in Pond 2 is stored in an adjacent above ground storage tank pending proper disposal. During an inspection by TRC on September 10, 2014, minimal separate phase oil was observed on Pond 2. Further removal of any remaining oil-water emulsion from Pond Nos. 1 and 2 will be implemented upon approval of final Closure Plan.

(ii) The status of the excavation of oil-impacted bottom material from Pond Nos. 1 and 2.

Pending approval of final Closure Plan.

(iii) The status of the excavation of oil-affected soils adjacent to Pond Nos. 1 and 2.

Pending approval of final Closure Plan.

(iv) The status of confirmatory sampling (as applicable).

Pending approval of final Closure Plan.

(v) The status of backfilling and restoration of Ponds Nos. 1 and 2.

Pending approval of final Closure Plan.

C. PROBLEMS ENCOUNTERED DURING THE QUARTER

No problems have been encountered during this quarter.

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D. ACTIONS TAKEN TO RECTIFY PROBLEMS

Not applicable.

E. PROJECT SCHEDULE

The project schedule and progress report is presented below by task as presented in the Streamlined Order.

Item	Task	Description of Status
1	Consent Agreement and Final Order U.S. EPA Docket No. RCRA-05-2014-0013	Effective date 9/18/2014.
2	Closure Plan Submittal	Received by Ohio EPA on September 9, 2014.
3	Agency Review and 30-day Public Notice Period	Submitted for public comment period ending October 17, 2014.
4	Installation/implementation of upgraded Oil Water Separator (OWS) system	Construction initiated.
5	Contractor Procurement/Mobilization (including 10-Day Notification to Ohio EPA prior to mobilization)	Pending approval of final Closure Plan.
6	Pond 1 Remediation: – dewatering, excavation, disposal – visual inspection (CDF/Ohio EPA) – - confirmation sampling	To be initiated pending approval of final Closure Plan.
7	Pond 1 backfill, installation of clay liner	To be implemented pending completion of previous tasks.
8	Pond 2 Remediation: – dewatering, excavation, disposal – visual inspection (CDF/Ohio EPA) – confirmation sampling	To be initiated following remediation of Pond 1.
9	Pond 2 installation of clay liner	To be implemented pending completion of previous tasks.
10	Closure Certification Document (60 days of completion of the closure activities)	To be completed pending conclusion of previous tasks.
11	Quarterly Progress Reports	Initiated 3rd quarter 2014.

C.3

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

SEP 18 2014

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL 7009 1680 0000 7663 7176
RETURN RECEIPT REQUESTED

RELEASED
DATE 08/09/2018
RIN #
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Mr. Brad Ahbe
President
Canton Drop Forge Incorporated
4575 Southway Street Southwest
Canton, Ohio 44706

Re: Consent Agreement and Final Order
Canton Drop Forge, Inc.
Docket No: RCRA-05-2014-0013

Dear Mr. Ahbe:

Enclosed please find an original signed fully-executed Consent Agreement and Final Order (CAFO) in resolution of the above case. The originals were filed with the Regional Hearing Clerk on September 18, 2014.

Please pay the civil penalty in the amount of $431,100 in the manner prescribed in paragraph 37 of the CAFO, and reference all checks with the docket number RCRA-05-2014-0013. Your payment is due within 30 calendar days of the effective date of the CAFO. Also, enclosed is a *Notice of Securities and Exchange Commission Registrant's Duty to Disclose Environmental Legal Proceedings.* Thank you for your cooperation in resolving this matter.

Sincerely,

Gary J. Victorine

Gary J. Victorine, Chief
RCRA Branch

Enclosures

cc: Bruce McCoy, OEPA – (bruce.mccoy@epa.state.oh.us)
Eaton Weiler, C-14J

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NOTICE OF SECURITIES AND EXCHANGE COMMISSION REGISTRANTS' DUTY TO DISCLOSE ENVIRONMENTAL LEGAL PROCEEDINGS

Securities and Exchange Commission regulations require companies registered with the SEC (e.g., publicly traded companies) to disclose, on at least a quarterly basis, the existence of certain administrative or judicial proceedings taken against them arising under Federal, State or local provisions that have the primary purpose of protecting the environment. Instruction 5 to Item 103 of the SEC's Regulation S-K (17 CFR 229.103) requires disclosure of these environmental legal proceedings. For those SEC registrants that use the SEC's "small business issuer" reporting system, Instructions 1-4 to Item 103 of the SEC's Regulation S-B (17 CFR 228.103) requires disclosure of these environmental legal proceedings.

If you are an SEC registrant, you have a duty to disclose the existence of pending or known to be contemplated environmental legal proceedings that meet any of the following criteria (17 CFR 229.103(5)(A)-(C)):

A. Such proceeding is material to the business or financial condition of the registrant;
B. Such proceeding involves primarily a claim for damages, or involves potential monetary sanctions, capital expenditures, deferred charges or charges to income and the amount involved, exclusive of interest and costs, exceeds 10 percent of the current assets of the registrant and its subsidiaries on a consolidated basis; or
C. A governmental authority is a party to such proceeding and such proceeding involves potential monetary sanctions, unless the registrant reasonably believes that such proceeding will result in no monetary sanctions, or in monetary sanctions, exclusive of interest and costs, of less than $100,000; provided, however, that such proceedings which are similar in nature may be grouped and described generically.

Specific information regarding the environmental legal proceedings that must be disclosed is set forth in Item 103 of Regulation S-K or, for registrants using the "small business issuer" reporting system, Item 103(a)-(b) of Regulation S-B. If disclosure is required, it must briefly describe the proceeding, "including the name of the court or agency in which the proceedings are pending, the date instituted, the principal parties thereto, a description of the factual basis alleged to underlie the proceedings and the relief sought."

You have been identified as a party to an environmental legal proceeding to which the United States government is, or was, a party. If you are an SEC registrant, this environmental legal proceeding may trigger, or may already have triggered, the disclosure obligation under the SEC regulations described above.

This notice is being provided to inform you of SEC registrants' duty to disclose any relevant environmental legal proceedings to the SEC. This notice does not create, modify or interpret any existing legal obligations, it is not intended to be an exhaustive description of the legally applicable requirements and it is not a substitute for regulations published in the Code of Federal Regulations. This notice has been issued to you for information purposes only. No determination of the applicability of this reporting requirement to your company has been made by any governmental entity. You should seek competent counsel in determining the applicability of these and other SEC requirements to the environmental legal proceeding at issue, as well as any other proceedings known to be contemplated by governmental authorities.

If you have any questions about the SEC's environmental disclosure requirements, please contact the SEC Office of the Special Senior Counsel for Disclosure Operations at (202) 942-1888.

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INITIALS Paul Chechelin

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

In the Matter of:	)	Docket No. RCRA-05-2014-0013
	)	
Canton Drop Forge, Inc. Canton, Ohio U.S. EPA ID No. OHD004465142	)	Consent Agreement and Final Order
	)	
Respondent.	)	

REGIONAL HEARING CLERK
RECEIVED
SEP 18 2014
U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 5

Consent Agreement and Final Order

The United States Environmental Protection Agency (U.S. EPA or Complainant) and Canton Drop Forge, Inc. (Canton Drop Forge or Respondent) have agreed to settle this action and consent to the entry of this Consent Agreement and Final Order (CAFO) without any adjudication of any issues of law or fact herein.

Preliminary Provisions

1. This is an administrative action commenced and concluded under Section 3008(a) of the Solid Waste Disposal Act, as amended, also known as the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6928(a), and Sections 22.13(b) and 22.18(b)(2) and (3) of the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits (Consolidated Rules) as codified at 40 C.F.R. Part 22.

2. Jurisdiction for this action is conferred upon U.S. EPA by Sections 3006 and 3008 of RCRA, 42 U.S.C. §§ 6926 and 6928.

3. The Complainant, by lawful delegation, is the Director of the Land and Chemicals Division, U.S. EPA, Region 5.

4. Respondent is a corporation doing business in the State of Ohio.

5. Where the parties agree to settle one or more causes of action before the filing of a complaint, the administrative action may be commenced and concluded simultaneously by the issuance of a CAFO. 40 C.F.R. § 22.13(b).

6. The parties agree that settling this action without the filing of a complaint or the adjudication of any issue of fact or law is in their interest and in the public interest.

7. Respondent waives its right to request a hearing as provided at 40 C.F.R. § 22.15(c), any right to contest the allegations in this CAFO, and its right to appeal this CAFO.

8. Respondent consents to the terms of this CAFO, including the assessment of the Civil Penalty and the issuance of the Compliance Provisions.

9. U.S. EPA provided notice of commencement of this action to the State of Ohio pursuant to Section 3008(a)(2) of RCRA, 42 U.S.C. § 6928(a)(2).

10. Respondent admits the jurisdictional allegations in this CAFO and neither admits nor denies the factual allegations and alleged violations in this CAFO.

Statutory and Regulatory Background

11. U.S. EPA has promulgated regulations establishing a hazardous waste management program, codified at 40 C.F.R. Parts 260 through 279, governing, *inter alia*, generators of used oil, pursuant to Sections 3001 – 3023, 42 U.S.C. §§ 6921 – 6939e.

12. Under Section 3006 of RCRA, 42 U.S.C. § 6926, U.S. EPA may authorize a state to administer the RCRA hazardous waste management program in lieu of the federal program when the Administrator finds that the state program meets certain conditions.

13. Under Section 3008(a), U.S. EPA may issue an order assessing a civil penalty or requiring compliance to any person that has violated or is in violation of any requirement of Subtitle C of RCRA (Sections 3001-3023, 42 U.S.C. §§ 6921-6939e), including any requirement

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of a state hazardous waste management program authorized under Section 3006(b) of RCRA, 42 U.S.C. § 6926(b).

14. Under Section 3006(b) of RCRA, 42 U.S.C. § 6926(b), U.S. EPA granted the State of Ohio final authorization to administer a state hazardous management waste program in lieu of the federal government's program effective June 30, 1989. 54 *Fed. Reg.* 27170 (June 28, 1989).

15. OAC Chapter 3745-279 [40 C.F.R. Part 279] sets forth the minimum standards for the management of used oil (Used Oil Management Standards).

16. Under OAC rule 3745-279-12(A), [40 C.F.R. 279.12(a)], a used oil generator is prohibited from managing used oil in a surface impoundment unit, unless:

a. It is subject to a hazardous waste operating permit meeting the minimum standards for the management of hazardous waste in surface impoundments, set forth at OAC Chapters 3745-54 through 3745-57 and 3745-205 [40 C.F.R. Part 264, Subparts A through N and DD]; or

b. It is subject to the interim status standards for the management of hazardous waste in surface impoundments, set forth at OAC Chapters 3745-65 through 3745-69 and 3745-256 [40 C.F.R. Part 265, Subparts A through N and DD].

17. Under OAC rule 3745-279-22(A) [40 C.F.R. 279.22(a)], a used oil generator is prohibited from storing used oil in a surface impoundment unit, unless:

a. It is subject to a hazardous waste operating permit meeting the minimum standards for the management of hazardous waste in surface impoundments, set forth at OAC Chapters 3745-54 through 3745-57 and 3745-205 [40 C.F.R. Part 264, Subparts A through N and DD]; or

b. It is subject to the interim status standards for the management of hazardous waste in surface impoundments, set forth at OAC Chapters 3745-65 through 3745-69 and 3745-256 [40 C.F.R. Part 265, Subparts A through N and DD].

Factual Allegations and Alleged Violations

16. Unless otherwise indicated, Complainant alleges the following at all times relevant to this CAFO.

17. Respondent constitutes a "person," as defined under OAC rule 3745-50-10(A)(95) [40 C.F.R. § 260.10], and Section 1004(15) of RCRA, 42 U.S.C. § 6903(15).

18. Respondent manufactures steel forgings on land and other appurtenances that it owns at 4575 Southway Street SW, Canton, Ohio (Respondent's Facility or Facility).

19. Respondent constitutes an "owner" and "operator" of a facility as those terms are defined under OAC rules 3745-50-10(A)(90) and (91) [40 C.F.R. § 260.10].

20. Respondent uses oil as part of its manufacturing process, resulting in the generation of "used oil," as defined under OAC rule 3745-279-01(A)(12) [40 C.F.R. § 279.1].

21. Respondent constitutes a "used oil generator," as defined under OAC rule 3745-279-01(A)(17) [40 C.F.R. § 279.1].

Count 1

22. Complainant incorporates Paragraphs 1 through 21 of this CAFO as though set forth in this Paragraph.

23. Respondent caused or allowed "used oil" to be conveyed and released to a clay-lined basin at the Facility (identified as Pond No. 1, or Lagoon No. 1).

24. Pond No. 1 constitutes a "surface impoundment," as defined under OAC rule 3745-50-10(A)(120) [40 C.F.R. § 260.10].

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25. Respondent "managed" used oil in Pond No 1, as defined under OAC rule 3745-50-10(A)(77) and [40 C.F.R. § 260.10].

26. Respondent "stored" used oil in Pond No. 1, as defined under OAC rule 3745-50-10(A)(118) [40 C.F.R. § 260.10].

27. Respondent violated OAC rule 3745-279-12(A) [40 C.F.R. 279.12(a)] by managing used oil in the surface impoundment identified as Pond No. 1 without a hazardous waste operating permit meeting the minimum standards for the management of hazardous waste in surface impoundments, and without meeting the interim status standards for the management of hazardous waste in surface impoundments.

28. Respondent violated OAC rule 3745-279-22(A) [40 C.F.R. 279.22(a)] by storing used oil in the surface impoundment identified as Pond No. 1 without a hazardous waste operating permit meeting the minimum standards for the management of hazardous waste in surface impoundments, and without meeting the interim status standards for the management of hazardous waste in surface impoundments.

Count 2

29. Complainant incorporates Paragraphs 1 through 28 of this CAFO as though set forth in this Paragraph.

30. Respondent caused or allowed "used oil" to be conveyed and released to an earthen-basin at the Facility (identified as Pond No. 2, or Lagoon No. 2).

31. Pond No. 2 constitutes a "surface impoundment," as defined under OAC rule 3745-50-10(A)(120) [40 C.F.R. § 260.10].

32. Respondent "managed" used oil in Pond No 2, as defined under OAC rule 3745-50-10(A)(77) [40 C.F.R. § 260.10].

33. Respondent "stored" used oil in Pond No. 2, as defined under OAC rule 3745-50-10(A)(118) [40 C.F.R. § 260.10].

34. Respondent violated OAC rule 3745-279-12(A) [40 C.F.R. 279.12(a)] by managing used oil in the surface impoundment identified as Pond No. 2 without a hazardous waste operating permit meeting the minimum standards for the management of hazardous waste in surface impoundments, and without meeting the interim status standards for the management of hazardous waste in surface impoundments

35. Respondent violated OAC rule 3745-279-22(A) [40 C.F.R. 279.22(a)] by storing used oil in the surface impoundment identified as Pond No. 2 without a hazardous waste operating permit meeting the minimum standards for the management of hazardous waste in surface impoundments, and without meeting interim status standards for the management of hazardous waste in surface impoundments.

Civil Penalty

36. Pursuant to Section 3008(a)(3) of RCRA, 42 U.S.C. § 6928(a)(3), Complainant determined that an appropriate civil penalty to settle this action is Four Hundred Thirty One Thousand, One Hundred U.S. Dollars ($431,100.00). In determining the penalty amount, Complainant took into account, *inter alia*, the seriousness of the alleged violations and Respondent's cooperation in resolving the matter, in accordance with U.S. EPA's RCRA Civil Penalty Policy.

37. Within 30 days after the effective date of this CAFO, Respondent must pay the civil penalty by sending a cashier's or certified check, payable to the "Treasurer, United States of America," to:

U.S. EPA
Fines and Penalties
Cincinnati Finance Center
P.O. Box 979077
St. Louis, MO 63197-9000

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The check must note the following: In the Matter of Canton Drop Forge, Inc. and the docket number of this CAFO.

37. A transmittal letter stating Respondent's name, the case title and the case docket number must accompany the payment. Respondent must send a copy of the check and transmittal letter to:

Regional Hearing Clerk (E-19J)
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

Brian Kennedy (LR-8J)
RCRA Branch
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

Eaton Weiler (C-14J)
Office of Regional Counsel
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

38. This civil penalty is not deductible for federal tax purposes.

39. If Respondent does not timely pay the civil penalty, U.S. EPA may bring an action to collect any unpaid portion of the penalty with interest, handling charges, nonpayment penalties, and the United States enforcement expenses for the collection action. The validity, amount, and appropriateness of the civil penalty are not reviewable in a collection action.

40. Pursuant to 31 C.F.R. § 901.9, Respondent must pay the following on any amount overdue under this CAFO. Interest will accrue on any amount overdue from the date payment was

due at a rate established by the Secretary of the Treasury pursuant to 31 U.S.C. § 3717(a)(1). Respondent must pay a $15 handling charge each month that any portion of the penalty is more than 30 days past due. In addition, Respondent must pay a 6 percent per year penalty on any principal amount 90 days past due.

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Compliance Provisions

41. Respondent shall not store, manage, or handle used oil except in compliance with the requirements and prohibitions codified at OAC Chapter 3745-279.

42. Respondent shall take all necessary measures to prohibit the discharge of used oil into surface impoundments at the Facility, including, but not limited to: designing, installing and operating a sufficient process wastewater system; designing, installing and operating sufficient oil-water separators; and complying with the terms and conditions of Permit to Install No. 975138, issued by the Ohio Environmental Protection Agency (OEPA) under OAC Chapter 3745-42.

43. Within 10 days of the effective date of this CAFO, Respondent shall submit to OEPA for review and approval a closure plan for Pond Nos. 1 and 2. The closure plan shall meet the requirements at OAC rules 3745-55-11 through 3745-55-20, and the requirements specific to surface impoundments at OAC rule 3745-56-28.

44. Respondent's closure plan shall be subject to review and approval by OEPA. If OEPA does not approve Respondent's closure plan and provides Respondent with a written statement of its deficiencies, then Respondent shall, within 30 days of receiving OEPA's written statement, submit to OEPA for review and approval a revised closure plan addressing the deficiencies. If OEPA approves Respondent's closure plan or modifies Respondent's closure plan, the approved or modified closure plan shall become the approved "Closure Plan."

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45. Respondent may enter into any necessary agreements with OEPA pursuant to Respondent's implementation of the Closure Plan, provided that the terms of any such agreements do not conflict with the terms of this CAFO.

46. Respondent shall implement the Closure Plan in accordance with this CAFO and OAC rule 3745-55-13.

47. Respondent shall provide U.S. EPA quarterly progress reports of its implementation of the Closure Plan. Progress reports shall be submitted no later than 15 calendar days following the end of each calendar quarter. Each progress report shall include, but shall not be limited to, the following information: (a) The status of the removal of oil-water emulsion from Pond Nos. 1 and 2, related photographs, and the volume of free phase oil and water removed from each Pond; (b) The status of the excavation of oil-impacted bottom material from Pond Nos. 1 and 2, related photographs, and the volume of bottom material removed for each Pond; (c) The status of the excavation of oil-affected soils adjacent to Pond Nos. 1 and 2, related photographs, and the volume of adjacent soils removed for each Pond; (d) The status of confirmatory sampling (as applicable) and the analytical results for the constituents of concern as outlined in the Closure Plan; (e) The status of backfilling and restoration of Ponds Nos. 1 and 2 and related photographs; and (f) A description of any event causing an actual or anticipated delay in the implementation of the Closure Plan, the actual or anticipated length of the delay, the nature and cause of the event, all measures taken or to be taken by Respondent to prevent or minimize the delay.

48. Within 30 days of OEPA's approval of the Closure Plan, Respondent shall submit to OEPA for review and approval a cost estimate and documentation demonstrating Respondent has established financial assurance and liability coverage, in accordance with OAC rules 3745-55-42 through 3745-55-47.

49. Within 60 days after Respondent completes closure of Pond Nos. 1 and 2, Respondent shall submit to OEPA a certification of closure in accordance with OAC rule 3745-55-15.

50. Prior to entering into any agreement or contract to convey, transfer, or assign ownership of any part of the Facility subject to this CAFO to any person who is not a party to this CAFO (Grantee), Respondent shall provide Grantee with a true, accurate and complete copy of this CAFO.

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51. Within 15 days of entering into any agreement or contract to convey, transfer, or assign ownership of any part of the Facility subject to this CAFO, Respondent shall provide to U.S. EPA and OEPA notification in writing. Such notification shall include: Grantee's name, address, and agent, and contact information.

52. Respondent shall submit all reports, submissions, and notifications required by this CAFO to:

Brian Kennedy (LR-8J)
RCRA Branch
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

General Provisions

53. Compliance with the terms of this CAFO resolves Respondent's liability for the facts and violations alleged in this CAFO.

54. Failure to comply with the terms of the Compliance Provisions of this CAFO may subject Respondent to penalties under Section 3008(c) of RCRA, 42 U.S.C. § 6928(c).

55. This CAFO does not affect Respondent's responsibility to comply with RCRA and other applicable federal, state, local laws or permits.

Released 08/03/2018 INITIALS

56. This CAFO is a "final order" for purposes of 40 C.F.R. § 22.31, U.S. EPA's RCRA Civil Penalty Policy, and U.S. EPA's Hazardous Waste Civil Enforcement Response Policy.

57. The terms of this CAFO bind Respondent, its successors, and assigns.

58. Each person signing this agreement certifies that he or she has the authority to sign for the party whom he or she represents and to bind that party to its terms.

59. Each party agrees to bear its own costs and attorney's fees in this action.

60. This CAFO constitutes the entire agreement between the parties.

Canton Drop Forge, Inc., Respondent

8/19/2014
Date

Brad A. Ahbe
President
Canton Drop Forge, Inc.

United States Environmental Protection Agency, Complainant

9/4/2014
Date

Margaret M. Guerriero
Director
Land and Chemicals Division

In the Matter of:
Canton Drop Forge, Inc.
Docket No. RCRA-05-2014-0013

Final Order

This Consent Agreement and Final Order, as agreed to by the parties, shall become effective immediately upon filing with the Regional Hearing Clerk. This Final Order concludes this proceeding pursuant to 40 C.F.R. §§ 22.18 and 22.31. IT IS SO ORDERED.

9-10-2014
Date

Susan Hedman
Regional Administrator
United States Environmental Protection Agency
Region 5

08/09/2018

Consent and Final Order
In the Matter of: Canton Drop Forge, Inc.

DOCKET NO: RCRA-05-2014-0013

REL DATE 08/07/2018
RIN #
INITIALS

CERTIFICATE OF SERVICE

I hereby certify that today I filed the original of this Consent Agreement and Final Order ((CAFO) docket number RCRA-05-2014-0013 the Regional Hearing Clerk (E-19J), United States Environmental Protection Agency, Region 5, 77 W. Jackson Boulevard, Chicago, Illinois 60604, and that I mailed the second original copy to Respondent by first-class, postage prepaid, certified mail, return receipt requested, by placing it in the custody of the United States Postal Service addressed as follows :

Mr. Brad Ahbe
President
Canton Drop Forge Incorporated
4575 Southway Street Southwest
Canton, Ohio 44706
Certified Mail # 7009 1680 0000 7663 7176

I certify that I delivered a correct copy of the CAFO by intra-office mail, addressed as follows:

Regional Judicial Officer (C-14J)
U.S. Environmental Protection Agency
77 W. Jackson Boulevard
Chicago, Illinois 60604

On the 18th Day of September Ruben B. Aridge

Ruben B. Aridge
Office Administrative Assistant
United States Environmental Protection Agency
Region V
Land and Chemicals Division LM-8J
77 W. Jackson Blvd, Chicago, IL 60604-3590

Certified Mail Receipt Number: **7009 1680 0000 7663 7176**