REPORT ON INSPECTION TO DETERMINE COMPLIANCE WITH THE EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW ACT OF 1986 (EPCRA), 42 U.S.C. § 11001 et seq.

EBW Electronics
13110 Ransom Street
Holland, MI 49424

April 4, 2006

Performed by

U.S. ENVIRONMENTAL PROTECTION AGENCY
PESTICIDES & TOXIC SUBSTANCES BRANCH
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604-3590

COMPANY INSPECTION

I. COMPANY IDENTIFICATION

EBW Electronics
13110 Ransom Street
Holland, MI 49424
616-399-0261

RESPONSIBLE OFFICIAL

James Corey Steeby, President

II. DATE OF INSPECTION

April 4, 2006

Telephone log when outreach phone call was made:
March 6, 2006 (Attachment A).

Telephone log confirming inspection date:
March 10, 2006 (Attachment A).

Pre-inspection letter confirming the inspection date, small business information sheet, proof of mailing, and proof of receipt:
March 13, 2006 (Attachment B)

III. PARTICIPANTS

The representative for EBW Electronics was:
J. Corey Steeby, President

U.S. EPA, REGION 5 representatives was:
John Myhre, DT-8J

IV. OBJECTIVES

The inspection was conducted to document the facility's reporting practices and to determine its compliance with the Emergency Planning and Community Right-to-Know Act (EPCRA) 42 U.S.C. § 11001 et seq. and Regulations as described in 40 CFR Part 372. The basis for the inspection was the neutral inspection scheme.

V. FACILITY BACKGROUND

The nature of the manufacturing activities at this facility is assembly of printed circuit boards. Mr. Steeby stated that about 80% of the boards are assembled under contract, and the remainder of the boards are part of fluorescent

ballasts designed and sold by the company. The boards are purchased from an outside vendor and components are added to the boards by soldering.

The facility was located at 701 Commerce Court, Holland Mi during 2004. Mr. Steeby said that the location was moved to the current address in July of 2005. The facility at 701 Commerce Court was housed in one building containing 10,000 square feet under roof.

The Parent Company is:

EBW Electronics
13110 Ransom Street
Holland, MI 49424
616-399-0261

A Dun & Bradstreet (D&B) report, printed MAR 14 2006, was obtained for EBW Electronics (Attachment C).

The facility did not apply for a Small Business Administration (SBA) loan in the last five years.

The SBA did not make a business size determination on the facility.

The Small Business Regulatory Enforcement Fairness Act (SBREFA) information sheet was sent to the facility with the pre-inspection letter (Attachment B).

The facility did not have NPDES and Air permits. Mr. Steeby stated that he did not know if they had a RCRA I.D. Number.

Mr. Steeby stated that the gross annual sales for the facility at 701 Commerce Court were $5,800,000 for calendar year 2004.

VI. SUMMARY OF INSPECTION

A. OPENING CONFERENCE

The inspector met with the facility representatives, presented his U.S. EPA inspector credentials to Mr. Steeby and explained the purpose of the inspection. The Notice of Inspection form for the Emergency Planning and Community Right-to-Know Act of 1986 was presented, filled out and signed by Mr. Myhre on behalf of the U.S. EPA. Mr. Steeby signed the Notice on behalf of EBW Electronics. A copy was

given to Mr. Steeby on behalf of EBW Electronics (Attachment D).

Mr. Steeby stated that the facility's activities are described by NAICS code 335311 and 334418. He did not know the SIC code, but after some discussion he agreed that the processes were described by SIC code 3769 (Electronic Components, Not Elsewhere Classified), according to "Standard Industrial Classification Manual, 1987").

Mr. Steeby stated that the facility had 25 employees or full-time-equivalents in calendar year 2004.

Mr. Steeby stated that the facility has not had any spills requiring reporting under Section 304 of EPCRA. He also stated that the facility has not been filing their chemical inventory reports by March 1st of each year as required by Sections 311 and 312 of EPCRA. Mr. Steeby stated that the reason for not filling was that possibly the facility is not required to report, although he was not sure of that fact.

B. WALK-THROUGH

The inspector was accompanied by Mr. Steeby during the walk-through of the facility. Mr. Steeby stated that the activities at the current Ransom Street location were the same as those at the Commerce Court location. The manufacturing processes at the facility were observed to be the following:

The inspector saw three surface mount technology (SMT) lines. The inspector saw the refrigerated storage area containing the solder paste. The solder paste was labeled Kester Easy Profile 256.

Mr. Steeby stated that some components are held onto the boards before soldering by use of adhesive. The inspector observed the refrigerated storage area containing the adhesives. The inspector saw Loctite 3609 and Loctite 444.

The inspector observed the through-hole assembly area. The components are all hand-inserted onto the boards.

The inspector observed the wave soldering machine. Dross was present in a bucket and on the floor in the vicinity of the machine. The inspector saw the bar solder used in the wave soldering machine. The bar solder box was labeled SN63PB37 ULD Bar. The bars of solder were marked Sn63Pb37.

The inspector observed the inspection and rework area. The roll solder used in that area had the label Kester Sn63Pb37 .015 and Kester Sn63Pb37 .031.

C. SECTION 313 CHEMICAL USAGE FOR 2004

Mr. Steeby stated that usage is determined from company purchase records. The inspector asked if the company determined inventories at the beginning and end of each year. Mr. Steeby stated that they did not take beginning and end inventories. Mr. Steeby said that they depended on the shop floor to tell them when to order, and that when the stock got below a certain level they would order more material. Mr. Steeby said that usage was equal to purchase.

The facility provided copies of invoices for materials purchased in calendar year 2004 which can be used to calculate the quantity of each mixture or trade name product used. The facility also provided copies of material safety data sheets for each of the mixtures and trade name products used. The material safety data sheets also contain information identifying EPCRA 313 listed toxic chemicals in the products and the concentration of each EPCRA 313 listed toxic chemical in percent.

Table 1.
Annual Usage of Listed Section 313 toxic chemicals and/or toxic chemical categories as Calculated by the EPA and the Facility for Calendar Year 2004.

Chemical	CAS No.	Annual usage in Pounds	How Used	Attachment
Lead	7439-92-1	1403	Processed	E

VII. CLOSING CONFERENCE

The representative for the company at the closing conference was Mr. Steeby.

The representative for the EPA was Mr. Myhre.

The inspector summarized the inspection activities for Mr. Steeby. The requirements for reporting were discussed and the

Form R was discussed. The inspector described the seminars concerning TRI that were offered.

The Receipt for Samples and Documents covered by the Emergency Planning and Community Right-to-Know Act was presented, filled out and signed by Mr. Myhre on behalf of the U.S. EPA. Mr. Steeby signed on behalf of the EBW Electronics. A copy was given to Mr. Steeby on behalf of the EBW Electronics (Attachment Q).

VIII. ATTACHMENTS

A. Telephone Log of March 7, 2006, telephone call scheduling inspection
B. Pre-inspection Letter dated March 13, 2006, Small Business Information Sheet, Proof of Mailing, and Proof of Receipt.
C. Dun & Bradstreet report printed March 14, 2006 for EBW Electronics Inc.
D. Notice of Inspection
E. Toxic Chemical Usage for Calendar year 2004.
F Telephone Log of July 11, 2006
G. Purchase Invoices from Kem-Tron for calendar year 2004.
H. Material Safety Data Sheet for Solder Alloys Containing Lead from Kester Reviewed on 07/21/03.
I. Material Safety Data Sheet for 245 CORE from Kester Reviewed on 04/04/2003.
J. Material Safety Data Sheet for EP256 Sn55Pb45, Sn60Pb40, Sn62Pb38, Sn63Pb37, Sn65Pb35 from Kester Reviewed on 03/28/2003.
K. Material Safety Data Sheet for R276 Sn55Pb45, Sn60Pb40, Sn62Pb38, Sn63Pb37, Sn65Pb35 from Kester Reviewed on 04/08/2003.
L. Copy of Label from Kester Type Easy Profile 256.
M. Copy of Label from Kester Type R276 NC.
N. Copy of Label from End of Carton containing Kester SN63PB37 ULD Bar, plus copy of Kester Ultra Low Dross bar.
O. Copy of Labels from end of Kester Wire Solder Roll.
P. Copy of Product Information Brochure from Kester for 245 No-Clean Cored Wire.
Q. Receipt for Samples and Documents

ATTACHMENT A.

Telephone Log of March 7, 2006,
telephone call scheduling inspection

U.S. ENVIRONMENTAL PROTECTION AGENCY **RECORD OF COMMUNICATION**	✔ PHONE CALL ☐ DISCUSSION ☐ FIELD TRIP ☐ CONFERENCE ☐ OTHER (SPECIFY) (RECORD OF ITEM CHECKED ABOVE)	
TO: EBW Electronics 13110 Ransom Street Holland, MI 49424	FROM: John D Myhre	DATE: March 6, 2006 TIME: 2:20 pm

SUBJECT: Compliance with EPCRA Section 313 for Reporting Year 2004

SUMMARY OF COMMUNICATION:

I called EBW's listed number (616-786-0575) and could not get beyond the automated answering service.

March 6, 2006; 3:30 PM
I found Mark Fluga, director of sales, on a search on the company, and used his name to make a contact. No answer; I left a voice mail message.
March 7, 2006; 8:03 AM
I was called by "Theresa" who left a message saying to call back.
March 7, 2006; 8:45 AM
I called Theresa, and was told I should talk to the president, Cory Steeby (extension 14). He was in a meeting, but she would have him call back.
March 7, 2006; 1:25 PM
I was called by Mark Fluga who said I could call him back and his extension was 23.
March 7, 2006; 1:30 PM
I called Mr. Fluga. I asked him how many employees they had, and the response was 35. They add components to PC boards. I asked if they used lead solder and he said yes. I asked how much they used during 2004, and he said he would get back to me. I reminded him that all consumption by the facility, including any sister companies located immediately adjacent, should be counted.
March 7, 2006; 1:50 PM
I was called by Mr. Steeby, who told me he had talked to a Mr. Maynard Shaw; he said Mr. Shaw discussed reporting for 2005. He said that they used a lot of solder, and I gave him a notice of impending inspection. He said he would get back to me with the amounts.
March 9, 2006; 1:30 PM
I called Mr. Steeby, and asked him (via voice mail) where the results were.
March 10, 2006; 1:30 PM
Mr. Steeby called and told me that they used about 1400 pounds of "lead" in 2004 and recycled 1062 pounds. I restated the notice of impending inspection, and chose April 4, 2006 at 9:00 AM. Mr. Steeby said that they moved from 701 Commerce Court to the current location at the start of 2005. I said that they should consider each facility separately when calculating useage.

CONCLUSIONS, ACTION TAKEN OR REQUIRED:

INFORMATION COPIES TO:

Documented by: John D. Myhre

Signature: John D. Myhre | Date: March 13. 2006

ATTACHMENT B.

Pre-inspection Letter dated March 13, 2006, Small Business Information Sheet, Proof of Mailing, and Proof of Receipt.

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

March 13, 2006

REPLY TO THE ATTENTION OF
DT-8J

CERTIFIED MAIL
RECEIPT No. 7004 2510 0000 9116 7133

Cory Steebe
President
EBW Electronics Inc
13110 Ransom Street
Holland, MI 49424

Dear Mr. Steebe

On April 4, 2006 at 9:00 AM , I, as a representative of the U.S. Environmental Protection Agency (U.S. EPA) will conduct an inspection at your Grand Rapids facility to evaluate the facility's compliance with the Emergency Planning and Community Right-to-Know Act (EPCRA, also known as SARA Title III), Section 313 and the Pollution Prevention Act. The inspection will cover calendar year 2004, and will cover the facility located at 701 Commerce Court.

Enclosed is a list summarizing the information to be covered during this inspection. Having all the required data available will facilitate the inspection. After the inspection, it is requested that copies of the information reviewed be shipped to:

John D Myhre (DT-8J)
U.S. EPA-Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3590

Also enclosed is the "Toxic Chemical Release Inventory Reporting Form R and Instructions, Revised 2004 Version".

Also enclosed is a U.S. EPA information sheet titled "U.S. EPA Small Business Resources" which may be helpful if you are a qualified small business.

If you have any questions concerning this matter, please contact me at 312-886-6018.

The undersigned is assisting the U.S. EPA under a Cooperative Agreement with Senior Service America, Inc.

Sincerely,

John D. Myhre

John D. Myhre
Multi-Program Inspector
Waste, Pesticides, & Toxics Enforcement Section

Enclosures

EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW ACT
SECTION 313 OR SARA TITLE III - TOXIC CHEMICAL RELEASE INVENTORY
EBW MANUFACTURING
INSPECTION SCENARIO

A. TIME PERIOD

Calendar year 2004

B. COMPANY INFORMATION

1. Standard Industrial Code. If more than one SIC applies, which one is primary and how is that determined.
2. Plant Size
   a. Number of buildings.
   b. Area under roof (square feet).
3. Employees
   a. One full time equivalent employee equals 2000 man hours per year.
   b. Number of full time equivalent employees for each calendar year.
   c. Include all employees who work out of this facility. (Manufacturing, office support, management, sales people, owners, part timers, etc.).
   d. Also, total number of employees in the corporation.
4. Small Business Administration (SBA) Loans or Grants
   a. Has the company applied for an SBA loan or grant in the last 5 years? .
   b. If the answer to B.4.a is yes, please provide a copy of the SBA Certification of Small Business, if it is available.
   c. If the answer to B.4.a is no, has the SBA ever made a business size determination on the company.
   d. If the answer to B.4.c is yes, what was the outcome.
5. Parent Company
   Name and Address
6. Gross Revenues
   Facility and corporate, for the calendar year listed in Item A. above.

C. LISTED SECTION 313 TOXIC CHEMICAL USAGE DOCUMENTATION

1. Documents, such as invoices, plant usage sheets, etc., are needed to verify facility usage (in lbs) of listed Section 313 toxic chemicals and/or toxic chemical categories or mixtures containing listed Section 313 toxic chemicals and/or toxic chemical categories. Copies of this documentation are needed for the calendar year listed in Item A. above.
2. MSDS, or other documents, which lists the component weight % of listed Section 313 toxic chemicals and/or toxic chemical categories in each of the products purchased by the facility for use in the facility's production processes. Copies of this documentation are needed for the calendar year listed in Item A. above. If the documentation is not dated as applicable to the calendar year listed in Item A. above, then a document is needed stating that the documentation submitted is applicable to the calendar year listed in Item A. above.
3. Documentation of the facility usage calculations, including methodology, utilized to determine usage of listed Section 313 toxic chemicals or toxic chemical categories. Copies of this documentation are needed for the calendar year listed in Item A. above.

4. Documentation of the determination of the Activity (Manufacture Use, Process Use, and/or Otherwise Use) of each listed Section 313 toxic chemical or toxic chemical category used. Copies of this documentation are needed for the calendar year listed in Item A. above.
5. Documentation of listed Section 313 toxic chemicals manufactured at the facility. Do not forget to include compounds resulting from intermediate chemical reactions such as those that occur in waste water treatment, etc. Copies of this documentation are needed for the calendar year listed in Item A. above.

D. SITE PERMITS AND PERMIT NUMBERS

1. NPDES
2. RCRA
3. Air

E. PROCESS FLOW DIAGRAMS

1. Indicate process flow and types of process equipment used
2. Point out where listed Section 313 toxic chemicals or toxic chemical categories are manufactured, processed and/or otherwise used.
3. Show where listed Section 313 toxic chemical releases occur.

F. STORAGE AREA(S)

1. Indicate location of indoor, outdoor and/or underground chemical storage areas on facility plot plan.
2. For all storage containers (tanks, totes, drums, cans, carboys, bags) indicate the following:
    a. Number of each type of container.
    b. Dry or liquid.
    c. Capacity per container (pounds or gallons).
    d. Name(s) of chemical(s) or mixture(s) stored in each container.
3. Gas cylinder storage
    a. Cylinder size (pounds).
    b. Name(s) of chemical(s) stored in cylinders.

G. HAZARDOUS WASTE DISPOSAL, INCLUDING MATERIAL USED FOR ENERGY RECOVERY OFF-SITE, MATERIAL RECYCLED OFF-SITE, MATERIAL TREATED OFF-SITE, AND MATERIAL DISPOSED OF BY OTHER MEANS OFF-SITE.

1. Site name and address.
2. Pick up frequency.
3. Quantity disposed of (lbs).

H. SARA TITLE III, SECTIONS 304, 311, 312

Provide evidence of compliance.

I. FACILITY INSPECTION

A walk through will be required.

United States
Environmental Protection
Agency

Office of Enforcement and Compliance Assurance (2201A)
EPA 300-F-03-001 May 2003

U. S. EPA Small Business Resources

If you own a small business, the United States Environmental Protection Agency (EPA) offers a variety of compliance assistance and tools to assist you in complying with federal and state environmental laws. These resources can help you understand your environmental obligations, improve compliance and find cost-effective ways to comply through the use of pollution prevention and other innovative technologies.

Hotlines, Helplines and Clearinghouses

EPA sponsors approximately 89 free hotlines and clearinghouses that provide convenient assistance regarding environmental requirements.

The National Environmental Compliance Assistance Clearinghouse provides quick access to compliance assistance tools, contacts, and planned activities from the U.S. EPA, states, and other compliance assistance providers: http://www.epa.gov/clearinghouse

Pollution Prevention Clearinghouse
http://www.epa.gov/opptintr/library/ppicindex.htm

EPA's Small Business Ombudsman Hotline can provide a list of all the hot lines and assist in determining the hotline best meeting your needs:
(800) 368-5888

Emergency Planning and Community Right-To-Know Act
(800) 424-9346

National Response Center (to report oil and hazardous substance spills)
(800) 424-8802

Toxics Substances and Asbestos Information
(202) 554-1404

Safe Drinking Water
(800) 426-4791

Stratospheric Ozone and Refrigerants Information
(800) 296-1996

Clean Air Technology Center
(919) 541-0800

Wetlands Helpline
(800) 832-7828

EPA Websites

EPA has several Internet sites that provide useful compliance assistance information and materials for small businesses. If you don't have access to the Internet at your business, many public libraries provide access to the Internet at minimal or no cost.

EPA's Home Page
http://www.epa.gov

Small Business Assistance Program
http://www.epa.gov/ttn/sbap

Office of Enforcement and Compliance Assurance
http://www.epa.gov/compliance

Compliance Assistance Home Page
http://www.epa.gov/compliance/assistance

Office of Regulatory Enforcement
http://www.epa.gov/compliance/civil/index.html

Office of Site Remediation Enforcement
http://www.epa.gov/compliance/cleanup

Innovative Programs for Environmental Performance
http://www.epa.gov/partners

Small Business Ombudsman
www.sba.gov/ombudsman

Recycled/Recyclable
Printed with Soy/Canola Ink on paper that contains at least 30% post consumer fiber

Compliance Assistance Centers

In partnership with industry, universities, and other federal and state agencies, EPA has established national Compliance Assistance Centers that provide Internet and "faxback" assistance services for several industries with many small businesses. The following Compliance Assistance Centers can be accessed through the Center's gateway at http://www.assistancecenters.net or by calling the phone numbers below and at their respective websites:

Metal Finishing
(1-800-AT-NMFRC or www.nmfrc.org)

Printing
(1-888-USPNEAC or www.pneac.org)

Automotive Service and Repair
(1-888-GRN-LINK or www.ccar-greenlink.org)

Agriculture
(1-888-663-2155 or www.epa.gov/agriculture)

Printed Wiring Board Manufacturing
(1-734-995-4911 or www.pwbrc.org)

The Chemical Industry
(1-800-672-6048 or www.chemalliance.org)

The Transportation Industry
(1-888-459-0656 or www.transource.org)

The Paints and Coatings Center
(1-800-286-6372 or www.paintcenter.org)

Three new centers are under development for the auto salvage sector, the construction industry, and U.S. Mexican border waste issues.

State Agencies

Many state agencies have established compliance assistance programs that provide on-site and other types of assistance. Contact your local state environmental agency for more information. For assistance in reaching state agencies, call EPA's Small Business Ombudsman at (800)-368-5888 or visit the Small Business Environmental Homepage at http://www.smallbiz-enviroweb.org/state.html.

Compliance Incentives

EPA provides incentives for environmental compliance. By participating in compliance assistance programs or voluntarily disclosing and promptly correcting violations, businesses may be eligible for penalty waivers or reductions. EPA has two policies that potentially apply to small businesses: The Audit Policy (http://www.epa.gov/compliance/incentives/auditing) and the Small Business Policy (http://www.epa.gov/compliance/incentives/smallbusiness). These do not apply if an enforcement action has already been initiated.

Commenting on Federal Enforcement Actions and Compliance Activities

The Small Business Regulatory Enforcement Fairness Act (SBREFA) established an ombudsman ("SBREFA Ombudsman") and 10 Regional Fairness Boards to receive comments from small businesses about federal agency enforcement actions. The SBREFA Ombudsman will annually rate each agency's responsiveness to small businesses. If you believe that you fall within the Small Business Administration's definition of a small business (based on your North American Industry Classification System (NAICS) designation, number of employees or annual receipts, defined at 13 C.F.R. 121.201; in most cases, this means a business with 500 or fewer employees), and wish to comment on federal enforcement and compliance activities, call the SBREFA Ombudsman's toll-free number at 1-888-REG-FAIR (1-888-734-3247).

Every small business that is the subject of an enforcement or compliance action is entitled to comment on the Agency's actions without fear of retaliation. EPA employees are prohibited from using enforcement or any other means of retaliation against any member of the regulated community because the regulated community previously commented on its activities.

Your Duty to Comply

If you receive compliance assistance or submit comments to the SBREFA Ombudsman or Regional Fairness Boards, you still have the duty to comply with the law, including providing timely responses to EPA information requests, administrative or civil complaints, other enforcement actions or communications. The assistance information and comment processes do not give you any new rights or defenses in any enforcement action. These processes also do not affect EPA's obligation to protect public health or the environment under any of the environmental statutes it enforces, including the right to take emergency remedial or emergency response actions when appropriate. Those decisions will be based on the facts in each situation. The SBREFA Ombudsman and Fairness Boards do not participate in resolving EPA's enforcement actions. Also, remember that to preserve your rights, you need to comply with all rules governing the enforcement process.

EPA is disseminating this information to you without making a determination that your business or organization is a small business as defined by Section 222 of the Small Business Regulatory Enforcement Fairness Act (SBREFA) or related provisions.

7004 2510 0000 9116 7133

U.S. Postal Service™
CERTIFIED MAIL™ RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com®

OFFICIAL USE

Postage	$ 4.20
Certified Fee	2.40
Return Receipt Fee (Endorsement Required)	1.85
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$ 8.45

CHICAGO IL LOOP STA
MAR 13 2006
Postmark Here
USPO

Sent To
Street, Apt. No.; or PO Box No.
City, State, ZIP+4

Cory Steebe, President
EBW Electronics, Inc.
13110 Ransom Street
Holland, MI 49424

PS Form 3800, August 2006 See Reverse for Instructions

SENDER: *COMPLETE THIS SECTION*

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Cory Steebe, President
EBW Electronics, Inc.
13110 Ransom Street
Holland, MI 49424

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X [signature] ☐ Agent ☐ Addressee

B. Received by *(Printed Name)* Therese Bennett
C. Date of Delivery 3-16

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☑ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. Article Number
(Transfer from service label) 7004 2510 0000 9116 7133

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

ATTACHMENT C.

Dun & Bradstreet report printed March 14, 2006
for EBW Electronics Inc.

Copyright 2006 Dun & Bradstreet - Provided under contract
for the exclusive use of subscriber 263776000L

Report Printed: MAR 14 2006
In Date

* * * BUSINESS SUMMARY * * *

EBW ELECTRONICS, INC
13110 Ransom St
Holland, MI 49424

*** Rating Change ***

This is a single location.

Web site:	www.ebw-electronics.com
Telephone:	616 399-0261
Fax:	616 786-0513
Chief executive:	JAMES CORY STEEBY, PRES
Year started:	1992
Employs:	28
Financial statement date:	DEC 31 2004
Net worth F:	$193,812
Gross revenueF:	$5,877,287
History:	CLEAR
Financing:	SECURED
Financial condition:	FAIR
SIC:	3679 3612 8731
Line of business:	Mfg electronic components, mfg transformers, commercial physical research

D-U-N-S® Number:	79-967-3603
D&B Rating:	CB3 Formerly --
Financial strength:	CB is $125,000 to 199,999
Composite credit appraisal:	3 is fair.
D&B PAYDEX®:	
12-Month D&B PAYDEX:	80

When weighted by dollar amount, payments to suppliers average generally within terms.

Based on trade collected over last 12 months.

==========

* * * SUMMARY ANALYSIS * * *

==========

D&B Rating: CB3

Financial strength: CB indicates $125,000 to 199,999

Composite credit appraisal: 3 is fair.

The Rating was changed on April 23, 2005 because D&B's analysis of the financial statement supports a higher Rating. This credit rating was assigned because of D&B's assessment of the company's financial ratios and its cash flow.

Below is an overview of the company's rating history since 02/09/93:

D&B Rating	Date Applied
CB3	04/23/05
--	06/30/00
EE4	05/04/99
--	02/09/93

The Summary Analysis section reflects information in D&B's file as of March 13, 2006.

==========

* * * CUSTOMER SERVICE * * *

==========

If you have questions about this report, please call our Customer Resource Center at 1.800.234.3867 from anywhere within the U.S. If you are outside the U.S. contact your local D&B office.

*** Additional Decision Support Available ***

Additional D&B products, monitoring services and specialized investigations are available to help you evaluate this company or its industry. Call Dun & Bradstreet's Customer Resource Center at 1.800.234.3867 from anywhere within the U.S. or visit our website at www.dnb.com

==========

* * * HISTORY * * *

==========

The following information was reported 01/11/2005:

Officer(s): JAMES CORY STEEBY, PRESIDENT
LEO LE BLANC, CEO
LUANNE COOK, TREASURER

DIRECTOR(S): THE OFFICER(S)

Business started 1992 by officers. 84% of capital stock is owned by officers. 16% of capital stock is owned by 3 others.

JAMES CORY STEEBY born 1969. 1992-present active here.

LEO LE BLANC born 1926. 1954-71 vice president Woodward Corp, Birmingham, AL. 1971-74 vice president-operations for Campbell, Wyant & Campbell, Muskegon, MI. 1974-78 vice president-Castings Division of Rockwell International, Muskegon, MI. 1978 to present president of EBW Inc, Muskegon, MI. Also 1992 officer here.

LUANNE COOK born 1966. 1999-present active here.

Business address has changed from 701 Commerce Ct, Holland, MI, 49424 to 13110 Ransom St, Holland, MI, 49424.

==========

* * * BUSINESS REGISTRATION * * *

==========

CORPORATE AND BUSINESS REGISTRATIONS REPORTED BY THE SECRETARY OF STATE OR OTHER OFFICIAL SOURCE AS OF MAR 07 2006:

This data is for informational purposes only. Certification can only be obtained through the Michigan Department of Consumer and Industry Services, Bureau of Commercial Services, Corporation Division.

Registered Name:	EBW ELECTRONICS, INC.
Business type:	CORPORATION
Corporation type:	PROFIT
Date incorporated:	AUG 25 1992
State of incorporation:	MICHIGAN
Filing date:	AUG 25 1992
Registration ID:	333976
Duration:	PERPETUAL
Status:	ACTIVE
Where filed:	CORPORATIONS & DEVELOPMENT BUREAU, LANSING, MI
Registered agent:	JAMES CORY STEEBY, 13110 RANSOM STREET, HOLLAND, MI, 494240000 Agent status: ACTIVE

* * * OPERATIONS * * *

01/11/2005

Description: Manufactures electronic components, specializing in electronic circuits (100%). Manufactures power, distribution or specialty transformers. Engaged in commercial physical research, specializing in electronic research.

Terms are net 30 days. Has 25 account(s). Sells to commercial and industrial concerns. Territory : United States.

Nonseasonal.

Employees: 28 which includes officer(s).

Facilities: Leases 12,000 sq. ft. in a one story cinder block building.

* * * SIC & NAICS * * *

SIC: Based on information in our file, D&B has assigned this company an extended 8-digit SIC. D&B's use of 8-digit SICs enables us to be more specific to a company's operations than if we use the standard 4-digit code.

36790100	Electronic circuits
36120000	Transformers, except electric
87319901	Electronic research

NAICS:

334419	Other Electronic Component Manufacturing
335311	Power, Distribution, and Specialty Transformer Manufacturing
541710	Research and Development in the Physical, Engineering, and Life Scienceses

* * * D&B PAYDEX * * *

The D&B PAYDEX is a unique, dollar weighted indicator of payment performance based on up to 26 payment experiences as reported to D&B by trade references.

3-Month D&B PAYDEX: 80

When weighted by dollar amount, payments to suppliers average within terms.

Based on trade collected over last 3

12-Month D&B PAYDEX: 80

When weighted by dollar amount, payments to suppliers average generally within terms.

Based on trade collected over last

months.

12 months.

When dollar amounts are not considered, then approximately 95% of the company's payments are within terms.

* * * PAYMENT SUMMARY * * *

The Payment Summary section reflects payment information in D&B's file as of the date of this report.

Below is an overview of the company's dollar-weighted payments, segmented by its suppliers' primary industries:

	Total Rcv'd (#)	Total Dollar Amounts ($)	Largest High Credit ($)	W/In Terms (%)	Days Slow <31 (%)	31-60 (%)	61-90 (%)	90> (%)
Top industries:								
Whol electronic parts	7	842,550	600,000	98	2	-	-	-
Nonclassified	4	23,000	20,000	100	-	-	-	-
Help supply service	1	15,000	15,000	100	-	-	-	-
Trucking non-local	1	5,000	5,000	100	-	-	-	-
State commercial bank	1	2,500	2,500	100	-	-	-	-
Whol service paper	1	1,000	1,000	100	-	-	-	-
Whol hardware	1	1,000	1,000	100	-	-	-	-
Prepackaged software	1	500	500	100	-	-	-	-
Misc business credit	1	250	250	-	100	-	-	-
Data processing svcs	1	250	250	100	-	-	-	-
OTHER INDUSTRIES	6	300	100	67	33	-	-	-
Other payment categories:								
Cash experiences	0	0	0					
Payment record unknown	1	5,000	5,000					
Unfavorable comments	0	0	0					
Placed for collections:								
With D&B	0	0						
Other	0	N/A						
Total in D&B's file	26	896,350	600,000					

The highest "Now Owes" on file is $300,000

The highest "Past Due" on file is $500

The aggregate dollar amount of the 26 payment experiences in D&B's file equals 183.0% of this company's average monthly sales. In Dun & Bradstreet's opinion, payment experiences exceeding 10% of a company's average monthly sales can be considered representative of payment performance.

* * * PAYMENT DETAILS * * *

Detailed payment history

Date Reported (mm/yy)	Paying Record	High Credit ($)	Now Owes ($)	Past Due ($)	Selling Terms	Last Sale Within (months)
03/06	Ppt	20,000	7,500	0		1 mo
	Ppt	50	0	0		1 mo
02/06	Ppt	600,000	300,000	0		1 mo
	Ppt	200,000	50,000	0		1 mo
	Ppt	15,000	2,500	0	N10	1 mo
	Ppt	5,000	2,500	0		1 mo
	Ppt	2,500	0	0		4-5 mos
	Ppt	2,500	0	0	Special Agreemnt	2-3 mos
	Ppt	1,000	250	0		1 mo
	Ppt	1,000	0	0	N30	1 mo
	Ppt	50	0	0	N30	2-3 mos
	Slow 10	100	0	0		6-12 mos
	(013)	5,000	5,000	0	N30	1 mo
01/06	Ppt	7,500	750	0	N45	1 mo
	Ppt	500	0	0		6-12 mos
	Ppt	250	250	0		1 mo
	Ppt	50	0	0	N30	2-3 mos
	Ppt-Slow 15	30,000	2,500	0	N30	1 mo
12/05	Ppt	2,500	500	0		1 mo
	Ppt	250	250	0		1 mo
11/05	Ppt	0	0	0		6-12 mos
10/05	Ppt	50	0	0		6-12 mos
05/05	Ppt-Slow 30	2,500	750	500		1 mo
04/05	Slow 5	250	250	0		1 mo
03/05	Ppt	250	0	0		6-12 mos
	Ppt	50				1 mo

Payment experiences reflect how bills are met in relation to the terms granted. In some instances payment beyond terms can be the result of disputes over merchandise, skipped invoices etc.

Each experience shown is from a separate supplier. Updated trade experiences replace those previously reported.

* * * STATEMENT UPDATE * * *

04/22/2005

Fiscal statement dated DEC 31 2004:

Assets		Liabilities	
Cash	22,746	Accts Pay	477,268

Accts Rec	699,905	Notes Pay	529,540
Inventory	986,615	Shareholders	140,000
Prepaid	42,885	Distribution	
		Liability	
		Accruals	85,055
Curr Assets	1,752,151	Curr Liabs	1,231,863
Fixt & Equip	375,492	Long-Term Debt	701,968
		ADDIT. PD.-IN CAP	117,800
		CLASS A VOTING STOCK	1,580
		RETAINED EARNINGS	60,212
		CLASS B NON VOTING STOCK	14,220
Total Assets	2,127,643	Total	2,127,643

From JAN 01 2004 to DEC 31 2004 annual sales $5,877,287; cost of goods sold $3,751,092. Gross profit $2,126,195; operating expenses $1,642,899. Operating income $483,296; other expenses $32,043; net income before taxes $451,253; net income $451,253.

Extent of audit, if any, not indicated.

==========

* * * FINANCE * * *

==========

01/11/2005

Three-year statement comparative:

	Interim May 31 2000	Fiscal Dec 31 2000	Fiscal Dec 31 2001
Current Assets	1,761,156	1,739,710	1,565,213
Current Liabs	2,033,797	1,286,444	2,071,831
Current Ratio	0.87	1.35	0.76
Working Capital	(272,641)	453,266	(506,618)
Other Assets	204,173	163,409	211,373
Net Worth	(68,468)	(205,293)	(295,245)
Sales	1,523,613	276,357	4,142,232
Long Term Liab	0	821,968	0
Net Profit (Loss)	(1,904)	(208,198)	(89,952)

Interim statement dated AUG 31 2004:

Assets		Liabilities	
Cash	13,540	Accts Pay	574,904

Accts Rec	825,516	Notes Payable-Short Term	564,340
Inventory	1,083,855		
Prepaid	(3,561)	Accruals	26,213
		Shareholders Distribution Liability	90,000
Curr Assets	1,919,350	Curr Liabs	1,255,457
Fixt & Equip	277,222	Long Term Debt	716,968
		COMMON STOCK	7,000
		ADDIT. PD.-IN CAP	38,600
		RETAINED EARNINGS	178,547
Total Assets	2,196,572	Total	2,196,572

For The Period Ended August 31, 200 sales $4,122,890; cost of goods sold $2,596,993. Gross profit $1,525,897; operating expenses $1,006,309. Operating income $519,588. Net income $519,588.

Extent of audit, if any, not indicated.

Fixed assets shown net less $492,297 depreciation.

Sources contacted verified information on January 7, 2005.

* * * KEY BUSINESS RATIOS * * *

Statement date: DEC 31 2004
Based on this number of establishments: 77

Firm		Industry Median	
Return of Sales:	7.7	Return of Sales:	5.3
Current Ratio:	1.4	Current Ratio:	2.3
Assets / Sales:	36.2	Assets / Sales:	40.4
Total Liability / Net Worth:	997.8	Total Liability / Net Worth:	76.7

* * * PUBLIC FILINGS * * *

The following Public Filing data is for information purposes only and is not the official record. Certified copies can only be obtained from the official source.

* * * UCC FILINGS * * *

Collateral:	All Inventory and products - All Account(s) and products - All Fixtures and products - All Equipment and products - and OTHERS
Type:	Original
Sec. party:	OLD KENT BANK ATTN: CORPORATE BANKING DEPT., GRAND HAVEN, MI
Debtor:	EBW ELECTRONICS, INC.
Filing number:	D617068
Filed with:	SECRETARY OF STATE/UCC DIVISION, LANSING, MI
Date filed:	02/07/2000
Latest Info Received:	03/22/2000

Collateral:	Leased Equipment
Type:	Original
Sec. party:	VANGUARD FINANCIAL SERVICES, LOMBARD, IL
Debtor:	EBW ELECTRONICS INC
Filing number:	D715273
Filed with:	SECRETARY OF STATE/UCC DIVISION, LANSING, MI
Date filed:	11/16/2000
Latest Info Received:	01/05/2001

Collateral:	Leased Equipment
Type:	Original
Sec. party:	CHAMPION CREDIT CORPORATION, FRAMINGHAM, MA
Assignee:	THE MANIFEST GROUP, MARSHALL, MN
Debtor:	EBW ELECTRONICS, INC.
Filing number:	D225680
Filed with:	SECRETARY OF STATE/UCC DIVISION, LANSING, MI
Date filed:	04/28/1997
Latest Info Received:	05/23/1997

The public record items contained in this report may have been paid, terminated, vacated or released prior to the date this report was printed.

* * * GOVERNMENT ACTIVITY * * *

Activity summary

Borrower (Dir/Guar):	NO
Administrative debt:	NO
Contractor:	NO
Grantee:	NO
Party excluded from federal program(s):	NO

Possible candidate for socio-economic program consideration

Labor surplus area:	N/A
Small Business:	YES (2006)
8(A) firm:	N/A

The details provided in the Government Activity section are as reported to Dun & Bradstreet by the federal government and other sources.

Copyright 2006 Dun & Bradstreet - Provided under contract
for the exclusive use of subscriber 263776000L

FULL DISPLAY COMPLETE

ATTACHMENT D.

Notice of Inspection

NOTICE OF INSPECTION

U.S. ENVIRONMENTAL PROTECTION AGENCY

Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA)

1. INVESTIGATION IDENTIFICATION			2. TIME	3. FIRM NAME
DATE April 4, 2006	INSPECTOR NO. FEP57	DAILY SEQ. NO. 1	9:05	EBW Electronics
4. INSPECTOR ADDRESS United States Environmental Protection Agency Region 5 77 W. Jackson Blvd; DT-8J Chicago, IL 60604-3590				5. FIRM ADDRESS 13110 Ransom St Holland, MI 49424

REASON FOR INSPECTION: This inspection is for the purpose of determining compliance with the Emergency Planning and Community Right-to-Know Act of 1986, Section 313 toxic chemical release reporting requirements. The scope of this inspection may include, but is not limited to: reviewing and obtaining copies of documents and records; interviews and taking of statements; reviewing of chemical manufacturing, importing, processing, and/or use facilities, including waste handling and treatment operations; taking samples and photographs; and any other inspection activities necessary to determine compliance with the Act.

INSPECTOR SIGNATURE		RECIPIENT SIGNATURE	
John D. Myhre		[illegible]	
NAME John D. Myhre		NAME J Cory Steeby	
TITLE EPCRA Compliance Inspector	DATE SIGNED April 4, 2006	TITLE President	DATE SIGNED 4.4.06

EPA FORM 3540-35 (8-93)
★U.S. GPO: 1993-342-137/80115

ORIGINAL

ATTACHMENT E.

Toxic Chemical Usage for Calendar year 2004.

ATTACHMENT E.

Toxic Chemical Usage for Calendar Year 2004

Mr. Steeby stated that usage is determined from company purchase records. The inspector asked if the company determined inventories at the beginning and end of each year. Mr. Steeby stated that they did not take beginning and end inventories. Mr. Steeby said that they depended on the shop floor to tell them when to order, and that when the stock got below a certain level they would order more material. Mr. Steeby said that usage was equal to purchase.

The facility provided copies of invoices for materials purchased in calendar year 2004 which can be used to calculate the quantity of each mixture or trade name product used. Some of the purchases are cartridges of solder paste, and are purchased by cartridge. The weight of the cartridge is listed, allowing calculation of the weight purchased. The facility also provided copies of material safety data sheets for each of the mixtures and trade name products used. The material safety data sheets also contain information identifying EPCRA 313 listed toxic chemicals in the products and the concentration of each EPCRA 313 listed toxic chemical.

Many of the invoices contain handwritten notations. All handwritten notations were present when the copies of the invoices were obtained from the company.

The calculation procedure determines the annual usage in pounds of each product containing listed Section 313 toxic chemicals and/or toxic chemical categories. The data used to determine annual usage of each product containing listed Section 313 toxic chemicals and/or toxic chemical categories is obtained from documentation provided by the facility. The annual usage of listed Section 313 toxic chemicals and/or toxic chemical categories is determined by multiplying the annual usage of a given product by the weight percent of any listed Section 313 chemical in the given product as listed in the Supplier Notification document for each given product. The Supplier Notification documents are provided by the facility.

Each raw material will be examined individually. The listed Section 313 toxic chemical and/or toxic chemical category annual usage for a given listed Section 313 toxic chemical and/or toxic chemical category will be tabulated for each item. A summary will combine all of the information.

R256 STENCIL SOLDER PASTE

Copies of purchase invoices from Kemtron were provided by the facility for this product for calendar year 2004 (Attachment G).

The invoices show the following:

Invoice Number	Invoice Date	Description	Quantity (EA)
35096	01/19/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	4
35179	01/26/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	4
34993	01/08/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	4
35327	02/09/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	4
34571	02/23/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	4
35240	02/02/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	4
35617	03/08/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	4
35640	03/09/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	4
37532	03/17/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	4
35800	03/24/02	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	2
36038	04/14/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	8
36116	04/26/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	4
35931	04/06/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	8
36212	05/03/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	4
36306	05/10/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	4

Invoice Number	Invoice Date	Description	Quantity (EA)
36348	05/12/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	8
36403	05/18/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	7
36448	05/24/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	8
36546	06/01/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	4
36581	06/07/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	4
36644	06/11/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	4
36648	06/14/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	12
36759	06/22/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	8
36761	06/23/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	4
36838	06/29/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	4
36839	06/29/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	4
36544	06/01/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	4
37056	07/22/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	8
37073	07/26/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	4
36964	07/14/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	8
36959	07/13/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	4
37200	08/04/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	7
37240	08/09/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	4

Invoice Number	Invoice Date	Description	Quantity (EA)
37298	08/11/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	4
37329	08/13/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	4
37366	08/17/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	4
37413	08/24/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	8
37418	08/24/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	8
37584	09/09/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	8
37622	09/14/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	4
37645	09/15/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	8
37730	09/22/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	4
37847	09/30/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	8
37537	09/07/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	4
37950	10/11/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	4
38004	10/13/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	4
38096	10/20/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	4
38141	10/26/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	6
38170	10/28/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	4
38204	10/29/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	4
38501	11/29/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	7

Invoice Number	Invoice Date	Description	Quantity (EA)
38550	12/02/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	4
38377	11/15/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	4
38644*	12/09/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	5
38700*	12/21/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	7
		TOTAL	**289**

* These invoices state "Ship to 13110 Ransom Street". According to a telephone conversation with the facility (Attachment F), the carryover for each year is about the same, so these shipments will be used for the calculation of the consumption during calendar year 2004.)

The facility provided a copy of a Material Safety Data Sheet from Kester for "EP256 Sn55Pb45, Sn60Pb40, Sn62Pb38, Sn63Pb37, Sn65Pb35" reviewed on 02/28/2003 as applying to this product for calendar year 2004 (Attachment J). The MSDS states that the following metals are present:

- Tin in a range of 50-100%
- Lead in a range of 25-50%.

The MSDS further states "Solder Powder is typically 85-92% of the solder paste composition."

The facility provided a copy of the label from this product (Attachment L) which includes the information "Net Wt. 600G". Therefore each cartridge weighs 600 grams. The total weight received is

(289 cartridges) X (600 gr/cartridge) = (173,400 gr).

The weight in pounds is

(173,400 gr) / (454 gr/lb) = (381.9 lb).

The label copy (Attachment L) states "Alloy 63/37 90%". Therefore the material consists of 90% solder alloy. The weight of solder alloy received is

(381.9 lb) X (0.90) = (343.7 lb).

The invoice states that this material is "Sn63Pb37". Therefore the solder alloy contains 37% lead. The weight of lead received is

(352.7 lb) X (0.37) = (127.2 lb).

The solder is melted during manufacture and is therefore processed. The facility processed 127.2 pounds of lead in the form of R256 Solder Paste.

R276 SYRINGE SOLDER PASTE

Copies of purchase invoices from Kemtron were provided by the facility for this product for calendar year 2004 (Attachment G).

The invoices show the following:

Invoice Number	Invoice Date	Description	Quantity (EA)
35096	01/19/04	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe	4
35179	01/26/04	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe	1
35213	01/29/04	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe	3
35240	02/02/04	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe	4
35260	02/04/04	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe	8
35327	02/09/04	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe	4
35489	02/24/04	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe	4
35617	03/08/04	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe	4
35640	03/09/04	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe	16
35931	04/06/04	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe	4
36137	04/27/04	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe	4

Invoice Number	Invoice Date	Description	Quantity (EA)
36348	05/12/04	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe	7
36392	05/18/04	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe	10
36544	06/01/04	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe	4
36581	06/07/04	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe	4
36644	06/11/04	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe	4
36698	06/15/04	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe	4
37009	07/19/04	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe	4
37073	07/26/04	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe	4
37135	07/28/04	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe	4
37770	09/27/04	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe	4
		TOTAL	**105**

The facility provided a copy of a Material Safety Data Sheet from Kester for "R256 Sn55Pb45, Sn60Pb40, Sn62Pb38, Sn63Pb37, Sn65Pb35" reviewed on 02/28/2003 as applying to this product for calendar year 2004 (Attachment K). The MSDS states that the following metals are present:

- Tin in a range of 50-100%
- Lead in a range of 25-50%.

The MSDS further states "Solder Powder is typically 85-92% of the solder paste composition."

The facility provided a copy of the label from this product (Attachment M) which includes the information "Net Wt. 35G". Therefore each cartridge weighs 35 grams. The total weight received is

(105 cartridges) X (35 gr/cartridge) = (3,675 gr).

The weight in pounds is

(3,675 gr) / (454 gr/lb) = (8.1 lb).

The label copy (Attachment L) states "Alloy 63/37 87%". Therefore the material consists of 87% solder alloy. The weight of solder alloy received is

(8.1 lb) X (0.87) = (7.0 lb).

The invoice states that this material is "Sn63Pb37". Therefore the solder alloy contains 37% lead. The weight of lead received is

(7.0 lb) X (0.37) = (2.6 lb).

The solder is melted during manufacture and is therefore processed. The facility processed 2.6 pounds of lead in the form of R276 Solder Paste.

BAR SOLDER

Copies of purchase invoices from Kemtron were provided by the facility for this product for calendar year 2004 (Attachment G).

The invoices show the following:

Invoice Number	Invoice Date	Description	Quantity (LB)
35096	01/19/04	Sn63Pb37 Ultra Low Dross Bar Solder	200
35327	02/09/04	Sn63Pb37 Ultra Low Dross Bar Solder	200
35521	02/27/04	Sn63Pb37 Ultra Low Dross Bar Solder	200
35843	03/29/04	Sn63Pb37 Ultra Low Dross Bar Solder	200
35925	04/06/04	Sn63Pb37 Ultra Low Dross Bar Solder	200
36116	04/26/04	Sn63Pb37 Ultra Low Dross Bar Solder	200
36392	05/18/04	Sn63Pb37 Ultra Low Dross Bar Solder	200
36648	06/14/04	Sn63Pb37 Ultra Low Dross Bar Solder	200
36737	06/21/04	Sn63Pb37 Ultra Low Dross Bar Solder	200
36959	07/13/04	Sn63Pb37 Ultra Low Dross Bar Solder	200
37009	07/19/04	Sn63Pb37 Ultra Low Dross Bar Solder	200
37240	08/09/04	Sn63Pb37 Ultra Low Dross Bar Solder	200
37413	08/24/04	Sn63Pb37 Ultra Low Dross Bar Solder	200

Invoice Number	Invoice Date	Description	Quantity (LB)
37537	09/07/04	Sn63Pb37 Ultra Low Dross Bar Solder	200
37950	10/11/04	Sn63Pb37 Ultra Low Dross Bar Solder	200
38141	10/26/04	Sn63Pb37 Ultra Low Dross Bar Solder	200
38549	12/02/04	Sn63Pb37 Ultra Low Dross Bar Solder	200
		TOTAL	**3,400**

The facility provided a copy of a Material Safety Data Sheet from Kester for "Solder Alloys Containing Lead", reviewed on 07/21/03 (Attachment H) as applying to this product for calendar year 2004. The MSDS states that the following materials are present:

- Tin
- Lead
- Antimony
- Copper
- Silver
- Bismuth
- Zinc

Each of the above materials is listed as being present in the range of 0-100%. The MSDS further states "Composition and weight percent of solder alloys varies widely and can be determined by product label."

The facility provided a copy of the label at the end of the shipping box and a copy of the lettering on the bar of solder. The label states "SN63PB37 ULD BAR 1 2/3 LB". The bar states "Sn63Pb37 JSTD006A Kester Ultra Low Dross". Therefore the bar contains 37% lead.

The weight of lead received is

(3,400 lbs) X (0.37) = (1,258.0 lbs).

The solder is melted during manufacture, and is therefore processed. The facility processed 1,258.0 pounds of lead in the form of Kester bar solder.

WIRE SPOOL SOLDER

Copies of purchase invoices from Kemtron were provided by the facility for this product for calendar year 2004 (Attachment G).

The invoices show the following:

Invoice Number	Invoice Date	Description	Quantity (LB)
37543	09/07/04	Sn63Pb37 .015" 245/50 Wire 1lb Spools	10
"	"	Sn63Pb37 .031" 245/50 Wire 1lb Spools	10
37622	09/14/04	Sn63Pb37 .015" 245/50 Wire 1lb Spools	10
"	"	Sn63Pb37 .031" 245/50 Wire 1lb Spools	10
		TOTAL	**40**

The facility provided a copy of a Material Safety Data Sheet from Kester for "245 Core" reviewed on 04/04/2003 as applying to this product for calendar year 2004 (Attachment I). The MSDS states that the following metals are present:

- Tin
- Lead
- Copper
- Antimony
- Silver
- Zinc
- Bismuth

All of the above metals are listed as being present in the range of 0-100%. The MSDS further states "Composition and weight percent of solder alloys varies widely and can be determined by product label. Flux in core is typically 1–3% by weight."

The facility provided a copy of the label at the end of the roll of the .015 solder and the .031 solder (Attachment O). The labels read

"SN63PB37 #50/245 .015"

and

"SN63PB37 #50/245 .031"

The facility provided a copy of a product information sheet for "245 No-Clean Cored Solder (Attachment P). The attachment states "For tin/lead applications, core 50 or 58 (1.1 and 2.2% flux by weight) are recommended." The label reads "#50", so the solder contains 1.1% flux, and the remaining 98.9% is solder alloy.

The alloy metal consists of 98.9% by weight. The weight of solder alloy received is

(40 lbs) X (0.989) = (39.6 lbs)

The alloy consists of 37% lead. The amount of lead received is

(39.6 lbs) X (0.37) = (14.7 lbs)

The solder is melted during manufacture, and is therefore processed. The facility processed 14.7 pounds of lead in the form of.

SUMMARY OF LEAD PROCESSED

SOURCE	Quantity (LB)
Kester SN63PB37 wire solder	14.7
Kester R256 Solder Paste.	127.2
Kester R276 Solder Paste.	2.6
Kester bar solder.	1,258.0
TOTAL	1,402.5

EBW Electronics processed a total of 1403 lbs of lead in Calendar Year 2004.

ATTACHMENT F

Telephone Log of July 11, 2006

U.S. ENVIRONMENTAL PROTECTION AGENCY **RECORD OF COMMUNICATION**	✔ PHONE CALL ☐ DISCUSSION ☐ FIELD TRIP ☐ CONFERENCE ☐ OTHER (SPECIFY) (RECORD OF ITEM CHECKED ABOVE)

TO: Cory Steeby, President EBW Electronics 13110 Ransom Street Holland, MI 49424	FROM: John D Myhre	DATE: July 11, 2006 TIME: 1:30 PM

SUBJECT: Compliance with EPCRA Section 313 for Reporting Year 2004

SUMMARY OF COMMUNICATION:

Q. Did you discontinue using the 35 gram syringes? Did you use nothing after the purchase invoice 37770 dated 09/27/04 (R-276 Sn63Pb37 87% -325+500 35 Gram Syringe)?
A. That is correct. We had an expired syringe in the refrigerator, and used it to give you the copy of the syringe.

Q: You listed only two sets of orders for solder wire. Is this a typical year's consumption?

37543	09/07/04	Sn63Pb37 .015" 245/50 Wire 1lb Spools
"	"	Sn63Pb37 .031" 245/50 Wire 1lb Spools
37622	09/14/04	Sn63Pb37 .015" 245/50 Wire 1lb Spools
"	"	Sn63Pb37 .031" 245/50 Wire 1lb Spools

A. Yes, this is a typical year's consumption

Q. Were the following purchases used at Commerce Court? Or, if not, was this about the same amount carried over from 2003 so I can use it as the total?

38644*	12/09/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	5
38700*	12/21/04	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	7

* These invoices state "Ship to 13110 Ransom Street".

A. The two shipments were kept at Ransom Street, as we were starting up the facility in the start of the new year. The carryover per year is about the same, so these purchases can be used as a good estimate of the consumption during the course of 2004.

Q. For the product "SN63PB37 #50/245 .031", I need the product information to be able to officially determine the flux percentage in #50 core
A. I will send a copy of the product information sheet by email.

CONCLUSIONS, ACTION TAKEN OR REQUIRED:

INFORMATION COPIES TO:

Documented by: John D. Myhre

Signature: John D. Myhre | Date: July 11, 2006

ATTACHMENT G.

Purchase Invoices from Kem-Tron for calendar year 2004.

(6) Stencil Solder Paste

KEM-TRON INC.

7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:
34993

Invoice Date: 01/08/04

Salesman: Ed

Ship Via: UPS - Ground

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: 17985

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
4 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$45.00	$180.00
	Payment Due within 30 days of invoice date		
		Subtotal:	$180.00
		Tax:	$0.00
		Shipping:	$5.00
		Grand Total:	$185.00

RECEIVED
JAN 12 2004

K230
C
2-10-04

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:

35096

Invoice Date: 01/19/04

Salesman: Larry

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To: Ship Via: Our Delivery
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: PO18015-00

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
200 lbs	Sn63Pb37 Ultra Low Dross Bar Solder 01369NPI	$2.25	$450.00
4 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$45.00	$180.00
4 ea	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe 05398	$12.00	$48.00

KE 300
G
2-25-04

RECEIVED
JAN 21 2004

Payment Due within 30 days of invoice date

Subtotal:	$678.00
Tax:	$0.00
Shipping:	$0.00

Grand Total: $678.00

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE: 35179

Invoice Date: 01/26/04

Salesman: Ed

Ship Via: UPS - Ground

Bill To:
EBW Electronics, Inc
701 Commerce Court
Holland, MI 49424-

RECEIVED JAN 30 2004

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: 18067

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
4 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$45.00	$180.00
1 ea	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe 05398	$12.00	$12.00
	Payment Due within 30 days of invoice date		

KE 300
P
2-25-04

RECEIVED JAN 30 2004

Subtotal:	$192.00
Tax:	$0.00
Shipping:	$5.00
Grand Total:	$197.00

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

Processed From Backorder

INVOICE: 35213

KEM-TRON INC.
7370 Broadmoor Ave SE - Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

RECEIVED FEB 2 2004

Invoice Date: 01/29/04
Salesman: Ed
Ship Via: UPS - Ground

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: 18067

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
3 ea	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe 05398	$12.00	$36.00

RECEIVED FEB 11 2004

KE 300
0
2.25

Payment Due within 30 days of invoice date

Subtotal:	$36.00
Tax:	$0.00
Shipping:	$4.00
Grand Total:	$40.00

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

2

KEM-TRON INC.

7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE: 35240

Invoice Date: 02/02/04

Salesman: Larry

Ship Via: Our Delivery

RECEIVED FEB 6 2004

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: 18087

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
10 ea	OS-D-10 One-Step No Clean Braid .100 01420	$2.44	$24.40
4 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$45.00	$180.00
4 ea	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe 05398	$12.00	$48.00
	Payment Due within 30 days of invoice date		

RECEIVED FEB 11 2004

KE 300
C
02.25

Subtotal:	$252.40
Tax:	$0.00
Shipping:	$0.00

Grand Total: $252.40

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:
35260

Invoice Date: 02/04/04

Salesman: Larry

Our Delivery

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship Via:

Customer Order Number: 18121

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
8 ea	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe 05398	$12.00	$96.00
	Payment Due within 30 days of invoice date		

RECEIVED
FEB 9 2004

K230
C
8210

Subtotal:	$96.00
Tax:	$0.00
Shipping:	$0.00
Grand Total:	$96.00

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:

35327

Invoice Date: 02/09/04

Salesman: Larry

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship Via: Our Delivery

Customer Order Number: 18125

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
200 lbs	Sn63Pb37 Ultra Low Dross Bar Solder 01369NPI	$2.45	$490.00
4 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$45.00	$180.00
4 ea	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe 05398	$12.00	$48.00

14E300
C
3-10

RECEIVED
FEB 16 2004

Payment Due within 30 days of invoice date

Subtotal:	$718.00
Tax:	$0.00
Shipping:	$0.00

Grand Total: $718.00

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:

35471

Invoice Date: 02/23/04

Salesman: Larry

Ship Via: UPS - Ground

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: 18210

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
10 ea	OS-D-10 One-Step No Clean Braid .100 01420	$2.44	$24.40
4 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$45.00	$180.00
	Payment Due within 30 days of invoice date		

K2300 C 3/16

RECEIVED FEB 26 2004

Subtotal:	$204.40
Tax:	$0.00
Shipping:	$4.50

Grand Total: $208.90

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

RECEIVED
MAR - 1 2004

INVOICE: 35489

Invoice Date: 02/24/04
Salesman: Larry
Ship Via: UPS - Ground

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: 18216

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
4 ea	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe 05398 K2300 6 3.25	$12.00	$48.00
	Payment Due within 30 days of invoice date		
		Subtotal:	$48.00
		Tax:	$0.00
		Shipping:	$4.00
		Grand Total:	$52.00

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

RECEIVED
MAR - 4 2004

INVOICE: 35521

Invoice Date: 02/27/04
Salesman: Larry

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship Via: Our Delivery

Customer Order Number: 18238

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
200 lbs	Sn63Pb37 Ultra Low Dross Bar Solder 01369NPI	$2.45	$490.00

Tom okid increase in price on P.O.

KE300 c 3.25

Payment Due within 30 days of invoice date

Subtotal:	$490.00
Tax:	$0.00
Shipping:	$0.00
Grand Total:	$490.00

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:
35617

Invoice Date: 03/08/04

Salesman: Larry

Ship Via: UPS - Ground

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: PO18264

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
4 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$45.00	$180.00
4 ea	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe 05398	$12.00	$48.00

KE300
0
4-10

RECEIVED
MAR 15 2004

Payment Due within 30 days of invoice date

Subtotal:	$228.00
Tax:	$0.00
Shipping:	$5.00

Grand Total: $233.00

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:
35640

Invoice Date: 03/09/04

Salesman: Larry

Ship Via: UPS - Ground

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: PO18269-00

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
4 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$45.00	$180.00
16 ea	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe 05398	$12.00	$192.00
	Payment Due within 30 days of invoice date		

KE300
U
4-10

RECEIVED
MAR 15 2004

Subtotal:	$372.00
Tax:	$0.00
Shipping:	$6.00
Grand Total:	$378.00

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC.

7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:

35732

Invoice Date: 03/17/04

Salesman: Ed

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship Via: UPS - Ground

Customer Order Number: 18312

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
4 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$45.00	$180.00

RECEIVED MAR 22 2004

K2300
O
4/10

Payment Due within 30 days of invoice date

Subtotal:	$180.00
Tax:	$0.00
Shipping:	$5.00

Grand Total: $185.00

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

RECEIVED MAR 29 2004

INVOICE: 35800

Invoice Date: 03/24/04

Salesman: Larry

Ship Via: UPS - Ground

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: PO18347-00

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
2 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399 KE 300 C 4/25	$45.00	$90.00
	Payment Due within 30 days of invoice date		

Subtotal:	$90.00
Tax:	$0.00
Shipping:	$4.00
Grand Total:	$94.00

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

RECEIVED
APR 1 2004

INVOICE: 35843

Invoice Date: 03/29/04
Salesman: Larry
Ship Via: Our Delivery

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: 18373

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
200 lbs	Sn63Pb37 Ultra Low Dross Bar Solder 01369NPI	$3.15	$630.00
	KE 300 C 4/25		
	Payment Due within 30 days of invoice date		

Subtotal:	$630.00
Tax:	$0.00
Shipping:	$0.00

Grand Total: $630.00

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:
35925

Invoice Date: 04/06/04
Salesman: Larry
Ship Via: Our Delivery

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: 108393
Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
200 lbs	Sn63Pb37 Ultra Low Dross Bar Solder 01369NPI	$3.15	$630.00
	KE300 5-10-04 C		
	Payment Due within 30 days of invoice date		

RECEIVED APR 12 2004

Subtotal:	$630.00
Tax:	$0.00
Shipping:	$0.00
Grand Total:	$630.00

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON Inc.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:

35931

Invoice Date: 04/06/04

Salesman: Larry

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship Via: Our Delivery

Customer Order Number: 18400

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
8 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$45.00	$360.00
4 ea	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe 05398	$12.00	$48.00
	KE300 5-10-04 C		
	Payment Due within 30 days of invoice date		

RECEIVED
APR 12 2004

Subtotal:	$408.00
Tax:	$0.00
Shipping:	$0.00
Grand Total:	$408.00

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:
36038

Invoice Date: 04/14/04

Salesman: Larry

Ship Via: UPS - Ground

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: 18456

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
8 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$45.00	$360.00

KE300
C
5/10/04

RECEIVED
APR 20 2004

Payment Due within 30 days of invoice date

Subtotal:	$360.00
Tax:	$0.00
Shipping:	$4.00
Grand Total:	$364.00

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

2

KEM-TRON

7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:
36116

Invoice Date: 04/26/04

Salesman: Larry

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship Via: Our Delivery

Customer Order Number: PO18496-00

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
200 lbs	Sn63Pb37 Ultra Low Dross Bar Solder -01369	$3.15	$630.00
10 ea	OS-D-10 One-Step No Clean Braid .100-01420-01	$2.44	$24.40
4 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$46.20	$184.80
	Payment Due within 30 days of invoice date		

RECEIVED
MAY 3 2004

KE300
C
5/25

Subtotal:	$839.20
Tax:	$0.00
Shipping:	$0.00
Grand Total:	$839.20

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE: 36137

Invoice Date: 04/27/04

Salesman: Larry

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship Via: Our Delivery

Customer Order Number: PO18504-00

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
4 ea	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe 05398	$12.00	$48.00

RECEIVED
MAY 3 2004

KE300
C
5/25

Payment Due within 30 days of invoice date

Subtotal:	$48.00
Tax:	$0.00
Shipping:	$0.00
Grand Total:	$48.00

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:
36212

Invoice Date: 05/03/04

Salesman: Larry

Ship Via: UPS - Ground

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: 18552

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
10 ea	OS-D-10 One-Step No Clean Braid .100 01420	$2.44	$24.40
4 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$46.20	$184.80
	Payment Due within 30 days of Invoice date		
		Subtotal:	$209.20
		Tax:	$0.00
		Shipping:	$6.00
		Grand Total:	$215.20

RECEIVED
MAY 6 2004

KE300
C
6/10

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE: 36306

Invoice Date: 05/10/04

Salesman: Ed

Our Delivery

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship Via:

Customer Order Number: 18574

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
10 ea	OS-D-10 One-Step No Clean Braid .100 01420	$2.44	$24.40
4 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$46.20	$184.80
	Due to the volatile metals market there will be a temporary $1.20 surcharge to all paste cartridges.		
	RECEIVED MAY 12 2004		
	KE300 C 6/10		
	Payment Due within 30 days of invoice date		

Subtotal:	$209.20
Tax:	$0.00
Shipping:	$0.00
Grand Total:	$209.20

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:
36348

Invoice Date: 05/12/04
Salesman: Ed
Ship Via: UPS - Ground

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: 18627
Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
8 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$46.20	$369.60
7 ea	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe 05398	$12.00	$84.00
	Payment Due within 30 days of invoice date		
		Subtotal:	$453.60
		Tax:	$0.00
		Shipping:	$4.00
		Grand Total:	$457.60

RECEIVED
MAY 14 2004

KE300
P
6110

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

2

KEM-TRON INC.

7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE: 36392

Invoice Date: 05/18/04

Salesman: Larry

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship Via: Our Delivery

Customer Order Number: 18636

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
200 lbs	Sn63Pb37 Ultra Low Dross Bar Solder 01369NPI	$3.15	$630.00
10 ea	OS-D-10 One-Step No Clean Braid .100 01420	$2.44	$24.40
10 ea	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe 05398	$13.28	$132.80

C 6/25

RECEIVED MAY 27 2004

Payment Due within 30 days of invoice date

Subtotal:	$787.20
Tax:	$0.00
Shipping:	$0.00

Grand Total: $787.20

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE: 36403

Invoice Date: 05/18/04

Salesman: Larry

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship Via: Our Delivery

Customer Order Number: PO18644-00

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
7 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$46.20	$323.40

RECEIVED
MAY 27 2004

6/25

Payment Due within 30 days of invoice date

Subtotal:	$323.40
Tax:	$0.00
Shipping:	$0.00

Grand Total: $323.40

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE: 36448

Invoice Date: 05/24/04

Salesman: Larry

Ship Via: UPS - Ground

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: P018703

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
8 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$46.20	$369.60

RECEIVED
MAY 27 2004

Ke300
C
6/25

Payment Due within 30 days of invoice date

Subtotal:	$369.60
Tax:	$0.00
Shipping:	$6.00
Grand Total:	$375.60

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON

7370 Broadmoor Ave SE - Caledonia, MI 49316
Phone: (616) 554 - 8860 Fax: (616) 554 - 8861
www.kem-tron.com

Invoice Number:

36544

Invoice Date: 06/01/04

Salesman: LF

Bill To:

EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To: **Ship Via:** Our Delivery

EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: 18765

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Attention:

Quantity	Description	Price Per Unit	Extended Price
4 ea	**256 Sn63Pb37 90% -325+500 600 Gram Cartridge** **05399**	$46.20	$184.80
4 ea	**R-276 Sn63Pb37 87% -325+500 35 Gram Syringe** **05398**	$12.07	$48.28

C
6/25

RECEIVED
JUN 8 2004

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the goverment specification identified above

Subtotal:	$233.08
Tax:	$0.00
Shipping:	$0.00
Grand Total:	$233.08

KEM-TRON INC.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:

36546

Invoice Date: 06/01/04

Salesman: Ed

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship Via: Our Delivery

Customer Order Number: 18788

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
4 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$46.20	$184.80

RECEIVED
JUN 8 2004

C 6/25

Payment Due within 30 days of invoice date

Subtotal:	$184.80
Tax:	$0.00
Shipping:	$0.00
Grand Total:	$184.80

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:

36581

Invoice Date: 06/07/04

Salesman: Larry

Ship Via: UPS - Ground

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: 18800

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
4 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$46.20	$184.80
4 ea	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe 05398	$12.07	$48.28
	Payment Due within 30 days of invoice date		

RECEIVED
JUN 14 2004

C
7/10

Subtotal:	$233.08
Tax:	$0.00
Shipping:	$4.50
Grand Total:	$237.58

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:

36644

Invoice Date: 06/11/04

Salesman: Ed

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To: Ship Via: Our Delivery
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: **18902**

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
4 ea	**256 Sn63Pb37 90% -325+500 600 Gram Cartridge** **05399**	$46.20	$184.80
4 ea	**R-276 Sn63Pb37 87% -325+500 35 Gram Syringe** **05398**	$12.07	$48.28
	Payment Due within 30 days of invoice date		

KE300
C
7/10

RECEIVED
JUN 14 2004

Subtotal:	$233.08
Tax:	$0.00
Shipping:	$0.00

Grand Total: $233.08

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:

36648

Invoice Date: **06/14/04**

Salesman: Larry

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship Via: **Our Delivery**

Customer Order Number: **18914**

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
200 lbs	**Sn63Pb37 Ultra Low Dross Bar Solder 01369NPI**	**$3.85**	**$770.00**
12 ea	**256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399**	**$46.20**	**$554.40**
	Payment Due within 30 days of invoice date		

KE300
C
9/10

RECEIVED
JUN 17 2004

Subtotal:	$1,324.40
Tax:	$0.00
Shipping:	$0.00
Grand Total:	**$1,324.40**

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:

36698

Invoice Date: 06/15/04

Salesman: Ed

Ship Via: UPS - Ground

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: **18921**

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
4 ea	**R-276 Sn63Pb37 87% -325+500 35 Gram Syringe** **05398**	$12.07	$48.28
	Payment Due within 30 days of invoice date		
		Subtotal:	$48.28
		Tax:	$0.00
		Shipping:	$4.00
		Grand Total:	$52.28

RECEIVED
JUN 17 2004

C
7110

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:

36737

Invoice Date: **06/21/04**

Salesman: **Larry**

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship Via: **Our Delivery**

Customer Order Number: **18927**

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
200 lbs	**Sn63Pb37 Ultra Low Dross Bar Solder** **01369NPI**	**$3.85**	**$770.00**
	Payment Due within 30 days of invoice date		

RECEIVED
JUN 25 2004

KE300
C
7/25

Subtotal:	$770.00
Tax:	$0.00
Shipping:	$0.00
Grand Total:	**$770.00**

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:
36759

Invoice Date: 06/22/04

Salesman: Larry

Our Delivery

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship Via:

Customer Order Number: **18932**

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
8 ea	**256 Sn63Pb37 90% -325+500 600 Gram Cartridge** **05399**	$46.20	$369.60
	Payment Due within 30 days of invoice date		
		Subtotal:	$369.60
		Tax:	$0.00
		Shipping:	$0.00
		Grand Total:	$369.60

RECEIVED
JUN 25 2004

C 1/25

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:
36761

Invoice Date: 06/23/04

Salesman: Larry

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship Via: Our Delivery

Customer Order Number: **PO18968-00**

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
4 ea	**256 Sn63Pb37 90% -325+500 600 Gram Cartridge** **05399**	$46.20	$184.80

RECEIVED
JUN 25 2004

C 9/25

Payment Due within 30 days of invoice date

Subtotal:	$184.80
Tax:	$0.00
Shipping:	$0.00
Grand Total:	**$184.80**

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE: 36838

Invoice Date: 06/29/04

Salesman: Larry

Ship Via: Our Delivery

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: 18974

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
10 ea	OS-D-10 One-Step No Clean Braid .100 01420	$2.65	$26.50
4 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$46.20	$184.80

RECEIVED JUL - 8 2004

C 7/25

Payment Due within 30 days of invoice date

Subtotal:	$211.30
Tax:	$0.00
Shipping:	$0.00
Grand Total:	$211.30

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE: 36839

Invoice Date: 06/29/04

Salesman: Larry

Ship Via: Our Delivery

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: 18983

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
4 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$46.20	$184.80
	Payment Due within 30 days of invoice date		
		Subtotal:	$184.80
		Tax:	$0.00
		Shipping:	$0.00
		Grand Total:	$184.80

RECEIVED JUL - 8 2004

C 7/25

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:

36959

Invoice Date: 07/13/04

Salesman: Larry

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To: Ship Via: Our Delivery
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: **19043**

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
200 lbs	**Sn63Pb37 Ultra Low Dross Bar Solder 01369NPI**	**$3.85**	**$770.00**
10 ea	**OS-D-10 One-Step No Clean Braid .100 01420**	**$2.65**	**$26.50**
4 ea	**256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399**	**$46.20**	**$184.80**

RECEIVED JUL 19 2004

C 8/10

Payment Due within 30 days of invoice date

Subtotal:	$981.30
Tax:	$0.00
Shipping:	$0.00

Grand Total: $981.30

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:

36964

Invoice Date: 07/14/04

Salesman: Larry

Ship Via: Our Delivery

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: **PO19072-00**

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
8 ea	**256 Sn63Pb37 90% -325+500 600 Gram Cartridge** **05399**	$46.20	$369.60
	Payment Due within 30 days of invoice date		

RECEIVED
JUL 19 2004

C
8110

Subtotal:	$369.60
Tax:	$0.00
Shipping:	$0.00

Grand Total: $369.60

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:
37009

Invoice Date: 07/19/04

Salesman: Larry

Ship Via: UPS - Ground

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: 19893

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
200 lbs	Sn63Pb37 Ultra Low Dross Bar Solder 01369NPI	$3.85	$770.00
4 ea	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe 05398	$12.07	$48.28

KE3000 C 8/25

RECEIVED
JUL 22 2004

Payment Due within 30 days of invoice date

Subtotal:	$818.28
Tax:	$0.00
Shipping:	$0.00
Grand Total:	**$818.28**

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:

37056

Invoice Date: 07/22/04

Salesman: *Ed*

Ship Via: UPS - Ground

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: **19100**

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
8 ea	**256 Sn63Pb37 90% -325+500 600 Gram Cartridge** **05399** KE300 C 8/25 RECEIVED JUL 28 2004 **Payment Due within 30 days of invoice date**	$46.20	$369.60
		Subtotal:	$369.60
		Tax:	$0.00
		Shipping:	$6.00
		Grand Total:	$375.60

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

2

KEM-TRON INC
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:

37073

Invoice Date: 07/26/04

Salesman: Larry

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

ENTERED

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship Via: UPS - Ground

Customer Order Number: **19111**

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
10 ea	**OS-D-10 One-Step No Clean Braid .100** **01420**	$2.65	$26.50
8 ea	**256 Sn63Pb37 90% -325+500 600 Gram Cartridge** **05399**	$46.20	$369.60
4 ea	**R-276 Sn63Pb37 87% -325+500 35 Gram Syringe** **05398**	$12.07	$48.28
	Payment Due within 30 days of invoice date		

K6300
C 425

RECEIVED
JUL 29 2004

Subtotal:	$444.38
Tax:	$0.00
Shipping:	$6.00
Grand Total:	$450.38

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:

37135

Invoice Date: 07/28/04

Salesman: Larry

Ship Via: UPS - Ground

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

ENTERED

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: **19133**

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
4 ea	**R-276 Sn63Pb37 87% -325+500 35 Gram Syringe** **05398**	$12.07	$48.28
	Payment Due within 30 days of invoice date		

C 8/25

RECEIVED JUL 30 2004

Subtotal:	$48.28
Tax:	$0.00
Shipping:	$5.00
Grand Total:	$53.28

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:
37200

Invoice Date: 08/04/04

Salesman: Larry

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

ENTERED

Ship To: Ship Via: Our Delivery
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: **PO19150-00**

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
7 ea	**256 Sn63Pb37 90% -325+500 600 Gram Cartridge** **05399**	$46.20	$323.40
	Payment Due within 30 days of invoice date		

C
9/10

RECEIVED
AUG 9 2004

Subtotal:	$323.40
Tax:	$0.00
Shipping:	$0.00

Grand Total: $323.40

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:
37240

Invoice Date: 08/09/04

Salesman: Larry

Our Delivery

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

ENTERED

Customer Order Number: **19163**

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
200 lbs	**Sn63Pb37 Ultra Low Dross Bar Solder 01369NPI**	$3.85	$770.00
4 ea	**256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399**	$46.20	$184.80
	Payment Due within 30 days of invoice date		

KE300 C 9/10

RECEIVED AUG 13 2004

Subtotal:	$954.80
Tax:	$0.00
Shipping:	$0.00

Grand Total: $954.80

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:
37298

Invoice Date: 08/11/04

Salesman: Larry

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

ENTERED

Ship To: Ship Via: UPS - Ground
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: **P019177-00**

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
4 ea	**256 Sn63Pb37 90% -325+500 600 Gram Cartridge** **05399**	$46.20	$184.80
	Payment Due within 30 days of invoice date		

C
9110

RECEIVED
AUG 13 2004

Subtotal:	$184.80
Tax:	$0.00
Shipping:	$5.00

Grand Total: $189.80

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:

37329

Invoice Date: 08/13/04

Salesman: Larry

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

ENTERED 8/20

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship Via: Our Delivery

Customer Order Number: **PO19187-00**

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
10 ea	**OS-D-10 One-Step No Clean Braid .100** **01420**	$2.65	$26.50
4 ea	**256 Sn63Pb37 90% -325+500 600 Gram Cartridge** **05399**	$46.20	$184.80
	Payment Due within 30 days of invoice date		
		Subtotal:	$211.30
		Tax:	$0.00
		Shipping:	$0.00
		Grand Total:	$211.30

C
9/10

RECEIVED
AUG 20 2004

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC.

7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

ENTERED 8/20

INVOICE: 37366

Invoice Date: 08/17/04

Salesman: Ed

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship Via: UPS - Ground

Customer Order Number: 19195 ~~19185~~

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
4 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$46.20	$184.80

C
9/10

RECEIVED AUG 20 2004

Payment Due within 30 days of invoice date

Subtotal:	$184.80
Tax:	$0.00
Shipping:	$5.00
Grand Total:	$189.80

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

2

KEM-TRON INC.

7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:

37413

Invoice Date: 08/24/04

Salesman: Larry

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

ENTERED 6/30

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship Via: Our Delivery

Customer Order Number: **19198**

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
200 lbs	**Sn63Pb37 Ultra Low Dross Bar Solder 01369NPI**	$3.85	$770.00
10 ea	**OS-D-10 One-Step No Clean Braid .100 01420**	$2.65	$26.50
8 ea	**256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399**	$46.20	$369.60
	Payment Due within 30 days of invoice date		

RECEIVED AUG 30 2004

C 9/25

Subtotal:	$1,166.10
Tax:	$0.00
Shipping:	$0.00
Grand Total:	$1,166.10

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:
37418

Invoice Date: 08/24/04

Salesman: Larry

Ship Via: Our Delivery

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

ENTERED 8/27

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: 19209

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
8 ea	**256 Sn63Pb37 90% -325+500 600 Gram Cartridge** **05399**	$46.20	$369.60
	Payment Due within 30 days of invoice date		

RECEIVED AUG 30 2004

C 9/85

Subtotal:	$369.60
Tax:	$0.00
Shipping:	$0.00
Grand Total:	$369.60

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

(3) wire spool solder

KEM-TRON INC.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE: 37543

Invoice Date: 09/07/04

Salesman: Ed

Ship Via: UPS - Ground

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: 19284

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
10 lbs	Sn63Pb37 .015" 245/50 Wire 1lb Spools	$11.50	$115.00
10 lbs	Sn63Pb37 .031" 245/50 Wire 1lb Spools	$7.40	$74.00

ENTERED

C 10/10

RECEIVED SEP 13 2004

Payment Due within 30 days of invoice date

Subtotal:	$189.00
Tax:	$0.00
Shipping:	$7.50

Grand Total: $196.50

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

2

KEM-TRON INC.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:
37537

Invoice Date: 09/07/04
Salesman: Larry
Our Delivery

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship Via:

Customer Order Number: **19288**

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
200 lbs	**Sn63Pb37 Ultra Low Dross Bar Solder 01369NPI**	$3.85	$770.00
10 ea	**OS-D-10 One-Step No Clean Braid .100 01420**	$2.65	$26.50
4 ea	**256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399**	$46.20	$184.80

ENTERED

C 10/10

RECEIVED SEP 13 2004

Payment Due within 30 days of invoice date

Subtotal:	$981.30
Tax:	$0.00
Shipping:	$0.00

Grand Total: $981.30

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:
37584

Invoice Date: 09/09/04
Salesman: Larry
Our Delivery

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship Via:

Customer Order Number: **19303**

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
8 ea	**256 Sn63Pb37 90% -325+500 600 Gram Cartridge** **05399** ENTERED C 10/10 RECEIVED SEP 13 2004 **Payment Due within 30 days of invoice date**	$46.20	$369.60
		Subtotal:	$369.60
		Tax:	$0.00
		Shipping:	$0.00
		Grand Total:	$369.60

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE: 37622

Invoice Date: 09/14/04

Salesman: Larry

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

ENTERED

Ship To: Ship Via: Our Delivery
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: P019326

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
10 lbs	Sn63Pb37 .015" 245/50 Wire 1lb Spools	$11.50	$115.00
10 lbs	Sn63Pb37 .031" 245/50 Wire 1lb Spools	$7.40	$74.00
4 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	$46.20	$184.80
	05399		
	C 10/10		
	Payment Due within 30 days of invoice date		

RECEIVED SEP 20 2004

Subtotal:	$373.80
Tax:	$0.00
Shipping:	$0.00

Grand Total: $373.80

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:
37645

Invoice Date: 09/15/04

Salesman: Ed

Ship Via: UPS - Ground

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: **19350**

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
8 ea	**256 Sn63Pb37 90% -325+500 600 Gram Cartridge** **05399**	$46.20	$369.60

C 10/10

ENTERED

RECEIVED SEP 20 2004

Payment Due within 30 days of invoice date

Subtotal:	$369.60
Tax:	$0.00
Shipping:	$7.00

Grand Total: $376.60

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:
37730

Invoice Date: 09/22/04

Salesman: Ed

Ship Via: UPS - Ground

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

ENTERED

Customer Order Number: **19367**

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
4 ea	**256 Sn63Pb37 90% -325+500 600 Gram Cartridge** **05399**	$46.20	$184.80
	Payment Due within 30 days of invoice date		

RECEIVED SEP 23 2004

C 10/25

Subtotal:	$184.80
Tax:	$0.00
Shipping:	$6.00
Grand Total:	$190.80

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON

7370 Broadmoor Ave SE - Caledonia, MI 49316
Phone: (616) 554 - 8860 Fax: (616) 554 - 8861
www.kem-tron.com

Invoice Number:

37770

Invoice Date: 09/27/04

Salesman: LF

Bill To:

EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To: **Ship Via:** Our Delivery

EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: 19370

MSDS and Tech Sheets available at: http://www.kem-tron.com/ **Attention:**

Quantity	Description	Price Per Unit	Extended Price
10 rl	**Glass Cloth Tape 1/2"** **01406**	$9.95	$99.50
4 ea	**R-276 Sn63Pb37 87% -325+500 35 Gram Syringe** **05398**	$12.07	$48.28

ENTERED

RECEIVED OCT 7 2004

P 10/25

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the goverment specification identified above

Subtotal:	$147.78
Tax:	$0.00
Shipping:	$0.00
Grand Total:	$147.78

KEM-TRON INC.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE: 37847

Invoice Date: 09/30/04

Salesman: Larry

Ship Via: Our Delivery

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: 19376

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
8 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$46.20	$369.60

ENTERED

C 10/25

RECEIVED OCT 7 2004

Payment Due within 30 days of invoice date

Subtotal:	$369.60
Tax:	$0.00
Shipping:	$0.00

Grand Total: $369.60

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC.

7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE: 37950

Invoice Date: 10/11/04

Salesman: Larry

Ship Via: Our Delivery

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: 19424

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
200 lbs	Sn63Pb37 Ultra Low Dross Bar Solder 01369NPI	$3.85	$770.00
4 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$46.20	$184.80
	Payment Due within 30 days of invoice date		

ENTERED

RECEIVED OCT 18 2004

C 11/10

Subtotal:	$954.80
Tax:	$0.00
Shipping:	$0.00
Grand Total:	$954.80

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:
38004

Invoice Date: 10/13/04

Salesman: Larry

Ship Via: UPS - Ground

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: **19427-00**

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
4 ea	**256 Sn63Pb37 90% -325+500 600 Gram Cartridge** **05399**	$46.20	$184.80

ENTERED

RECEIVED
OCT 18 2004

C 10/10

Payment Due within 30 days of invoice date

Subtotal:	$184.80
Tax:	$0.00
Shipping:	$6.00

Grand Total: $190.80

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE: 38096

Invoice Date: 10/20/04

Salesman: Larry

Ship Via: Our Delivery

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: 19492

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
4 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$46.20	$184.80

ENTERED

RECEIVED
OCT 29 2004
PAGE..... OF.....

C 11/25

Payment Due within 30 days of invoice date

Subtotal:	$184.80
Tax:	$0.00
Shipping:	$0.00

Grand Total: $184.80

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE: 38141

Invoice Date: 10/26/04

Salesman: Larry

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship Via: Our Delivery

Customer Order Number: 19500-00

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
200 lbs	Sn63Pb37 Ultra Low Dross Bar Solder 01369NPI	$3.85	$770.00
6 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$46.20	$277.20
	Payment Due within 30 days of invoice date		

RECEIVED
NOV 01 2004
PAGE..... OF.....

C
11/25

ENTERED

Subtotal:	$1,047.20
Tax:	$0.00
Shipping:	$0.00

Grand Total: $1,047.20

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:
38170

Invoice Date: 10/28/04

Salesman: Larry

Our Delivery

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship Via:

Customer Order Number: **19506**

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
4 ea	**256 Sn63Pb37 90% -325+500 600 Gram Cartridge** **05399** C 11/25 ENTERED RECEIVED NOV 05 2004 PAGE..... OF.....	$46.20	$184.80
	Payment Due within 30 days of invoice date		

Subtotal:	$184.80
Tax:	$0.00
Shipping:	$0.00
Grand Total:	$184.80

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE: 38204

Invoice Date: 10/20/04

Salesman: Larry

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To: Ship Via: Our Delivery
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: 19571

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
4 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$46.20	$184.80

ENTERED

C 11/25

RECEIVED
NOV 05 2004
PAGE..... OF.....

Payment Due within 30 days of invoice date

Subtotal:	$184.80
Tax:	$0.00
Shipping:	$0.00

Grand Total: $184.80

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:
38377

Invoice Date: 11/15/04
Salesman: Larry
Ship Via: UPS - Ground

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: 19618-00
Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
10 rl	Glass Cloth Tape 1/2" 01406	$9.95	$99.50
10 ea	OS-D-10 One-Step No Clean Braid .100 01420	$2.65	$26.50
4 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$46.20	$184.80

RECEIVED
NOV 18 2004
PAGE..... OF.....

ENTERED

C KE3008 12/10

Payment Due within 30 days of invoice date

Subtotal:	$310.80
Tax:	$0.00
Shipping:	$5.00

Grand Total: $315.80

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC.

7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:
38501

Invoice Date: 11/29/04

Salesman: Larry

Ship Via: UPS - Ground

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: 19695

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
10 ea	OS-D-10 One-Step No Clean Braid .100 01420	$2.65	$26.50
7 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$46.20	$323.40

12/25

RECEIVED
DEC 03 2004
PAGE..... OF.....

ENTERED

KE 300

Payment Due within 30 days of invoice date

Subtotal:	$349.90
Tax:	$0.00
Shipping:	$7.00

Grand Total: $356.90

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:
38549

Invoice Date: 12/02/04
Salesman: Larry

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To: Ship Via: Our Delivery
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: **19705**

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
200 lbs	**Sn63Pb37 Ultra Low Dross Bar Solder** **01369NPI**	$3.85	$770.00

RECEIVED
DEC 14 2004
PAGE..... OF.....

12/25

C
KE300

ENTERED

Payment Due within 30 days of invoice date

Subtotal:	$770.00
Tax:	$0.00
Shipping:	$0.00

Grand Total: $770.00

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:

38550

Invoice Date: 12/02/04

Salesman: Larry

Our Delivery

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To: Ship Via:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: **19702**

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
4 ea	**256 Sn63Pb37 90% -325+500 600 Gram Cartridge** **05399**	$46.20	$184.80

RECEIVED
DEC 14 2004
PAGE..... OF.....

ENTERED

12/25

C
KE300

Payment Due within 30 days of invoice date

Subtotal:	$184.80
Tax:	$0.00
Shipping:	$0.00

Grand Total: $184.80

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE: 38644

Invoice Date: 12/09/04

Salesman: Larry

Bill To:
EBW Electronics, Inc.
13110 Ransom St.
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
13110 Ransom St.
Holland, MI 49424-

Ship Via: Our Delivery

Customer Order Number: 19713-00

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
5 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$46.20	$231.00

ENTERED

RECEIVED
DEC 17 2004
PAGE..... OF.....

1/10 C

Payment Due within 30 days of invoice date

Subtotal:	$231.00
Tax:	$0.00
Shipping:	$0.00

Grand Total: $231.00

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC

7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE: 38790

Invoice Date: 12/21/04

Salesman: Larry

Ship Via: Our Delivery

Bill To:
EBW Electronics, Inc.
13110 Ransom St.
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
13110 Ransom St.
Holland, MI 49424-

Customer Order Number: 19789

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
10 ea	OS-D-10 One-Step No Clean Braid .100 01420	$2.65	$26.50
7 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$46.20	$323.40
	Payment Due within 30 days of invoice date		
		Subtotal:	$349.90
		Tax:	$0.00
		Shipping:	$0.00
		Grand Total:	$349.90

1/25

RECEIVED
DEC 27 2004
PAGE..... OF.....

ENTERED

KE300

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:

38814

Invoice Date: 12/27/04

Salesman: Larry

Bill To:
EBW Electronics, Inc.
13110 Ransom St.
Holland, MI 49424-

Ship To: Ship Via: UPS - Ground
EBW Electronics, Inc.
13110 Ransom St.
Holland, MI 49424-

Customer Order Number: 19804

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
4 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$46.20	$184.80

ENTERED

C
1/25

RECEIVED
JAN 01 2005
PAGE..... OF.....

Payment Due within 30 days of invoice date

Subtotal:	$184.80
Tax:	$0.00
Shipping:	$7.00

Grand Total: $191.80

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

ATTACHMENT H.

Material Safety Data Sheet for Solder Alloys Containing Lead from Kester Reviewed on 07/21/03.

Material Safety Data Sheet

acc. to ISO/DIS 11014

Printing date 07/31/2003 Reviewed on 07/21/2003

1 Identification of substance

Product details

Trade name: **SOLDER ALLOYS CONTAINING LEAD**
Application of the substance / the preparation: Solder

Manufacturer/Supplier:
Kester *Tel.(847) 297-1600*
515 E. Touhy Ave. *Fax.(847) 390-9338*
Des Plaines, IL 60018

Information department:
MSDS Coordinator *Tel. (847) 699-5755*
Emergency information:
CHEMTREC 24-Hour Emergency Telephone Number: *(800)424-9300*
CHEMTREC 24-Hour Emergency Telephone Number (Outside of the U.S. and Canada): *(703)527-3887*

2 Composition/Data on components

Chemical characterization
Description: *Mixture of the substances listed below with nonhazardous additions.*

Dangerous components:		
7440-31-5	*tin*	*0-100%*
7439-92-1	*lead*	*0-100%*
7440-36-0	*antimony*	*0-100%*
7440-50-8	*copper*	*0-100%*
7440-22-4	*silver*	*0-100%*
7440-69-9	*bismuth*	*0-100%*
7440-66-6	*Zinc*	*0-100%*

Additional information:
Composition and weight percent of solder alloys varies widely and can be determined by product label.

3 Hazards identification

WHMIS Hazard Symbols

Information pertaining to particular dangers for man and environment:
The product has to be labelled due to the calculation procedure of international guidelines.
Harmful by inhalation and if swallowed.
Danger of cumulative effects.
Possible risk of impaired fertility.
Contains lead. Should not be used on surfaces liable to be chewed or sucked by children.

(Contd. on page 2)

Material Safety Data Sheet

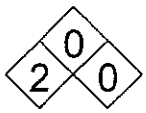
acc. to ISO/DIS 11014

Printing date 07/31/2003 Reviewed on 07/21/2003

Trade name: SOLDER ALLOYS CONTAINING LEAD

(Contd. of page 1)

Classification system:
NFPA ratings (scale 0 - 4)



Health = 2
Fire = 0
Reactivity = 0

HMIS-ratings (scale 0 - 4)

HEALTH	*2
FIRE	0
REACTIVITY	0

*Health = *2*
Fire = 0
Reactivity = 0

4 First aid measures

General information:
Symptoms of poisoning may even occur after several hours; therefore medical observation for at least 48 hours after the accident.
After inhalation: *Supply fresh air; consult doctor in case of complaints.*
After skin contact: *Immediately wash with water and soap and rinse thoroughly.*
After eye contact: *Rinse opened eye for several minutes under running water.*
After swallowing: *Induce vomiting, if person is conscious. Seek medical help.*

5 Fire fighting measures

Suitable extinguishing agents:
CO2, extinguishing powder or water spray. Fight larger fires with water spray or alcohol resistant foam.
Special hazards caused by the material, its products of combustion or resulting gases:
Melted solder above 1000°F will liberate toxic lead and/or antimony fumes.
Protective equipment: *Wear self-contained respiatory protective device.*

6 Accidental release measures

Person-related safety precautions: *Not required.*
Measures for environmental protection: *Do not allow to enter sewers/ surface or ground water.*
Measures for cleaning/collecting:
Melted solder will solidify on cooling and can be scraped up. Use caution to avoid breathing fumes if a gas torch is used to cut up large pieces.

7 Handling and storage

Handling:
Information for safe handling: *Ensure good ventilation/exhaustion at the workplace.*
Information about protection against explosions and fires: *Keep respiratory protective device available.*

Storage:
Requirements to be met by storerooms and receptacles: *No special requirements.*
Information about storage in one common storage facility: *Not required.*

(Contd. on page 3)

Material Safety Data Sheet

acc. to ISO/DIS 11014

Printing date 07/31/2003 Reviewed on 07/21/2003

Trade name: SOLDER ALLOYS CONTAINING LEAD

(Contd. of page 2)

Further information about storage conditions: *Store in dry conditions.*

8 Exposure controls and personal protection

Additional information about design of technical systems: *No further data; see item 7.*

Components with limit values that require monitoring at the workplace:	
7440-31-5 tin	
PEL	*2 mg/m³*
	Metal
REL	*2 mg/m³*
	Tin, Metal
TLV	*2 mg/m³*
7439-92-1 lead	
PEL	*0.05* mg/m³*
	as Pb
REL	*<0.1* mg/m³*
	*as Pb; *Blood Pb <0.06 mg/100 g whole blood*
TLV	*0.05 mg/m³*
	as Pb; BEI
7440-36-0 antimony	
PEL	*0.5 mg/m³*
REL	*0.5 mg/m³*
	as Sb
TLV	*0.5 mg/m³*
7440-50-8 copper	
PEL	*0.1*;1** mg/m³*
	**fume **dusts & mists*
REL	*0.1*;1** mg/m³*
	**Copper fume, as Cu **Copper dusts & mists, as Cu*
TLV	*0.2*, 1** mg/m³*
	**fume; ** dusts&mists, as Cu*
7440-22-4 silver	
PEL	*0.01 mg/m³*
REL	*0.01 mg/m³*
TLV	*0.1 mg/m³*

Additional information:
PEL = Permissible Exposure Limit (OSHA)
REL= Recommended Exposure Limit (NIOSH)
TLV= Threshold Limit Value (ACGIH)
OSHA= Occupational Safety and Health Administration
ACGIH= American Conference of Governmental Industrial Hygienists
NIOSH= National Institute for Occupational Safety and Health

Personal protective equipment:
General protective and hygienic measures:
Keep away from foodstuffs, beverages and feed.
Wash hands before breaks and at the end of work.
Immediately remove all soiled and contaminated clothing.
Store protective clothing separately.

(Contd. on page 4)

Material Safety Data Sheet

acc. to ISO/DIS 11014

Printing date 07/31/2003 Reviewed on 07/21/2003

Trade name: SOLDER ALLOYS CONTAINING LEAD

(Contd. of page 3)

Breathing equipment:
When ventilation is not sufficient to remove fumes from the breathing zone, a safety approved respirator or self-contained breathing apparatus should be worn.
Protection of hands:

Protective gloves

Material of gloves:
Cloth gloves
Nitrile rubber, NBR
Natural rubber, NR
Penetration time of glove material:
The exact break trough time has to be found out by the manufacturer of the protective gloves and has to be observed.
Eye protection:

Tightly sealed goggles

Safety glasses

9 Physical and chemical properties

General Information

Form:	*Solid*
Color:	*Silver grey*
Odor:	*Mild*

Change in condition
Melting point/Melting range: *> 100°C (> 212°F)*
Boiling point/Boiling range: *1740°C (3164°F)*

Flash point: *Not applicable.*

Danger of explosion: *Product does not present an explosion hazard.*

Density at 20°C (68°F): *> 7 g/cm³*

Solubility in / Miscibility with
Water: *Insoluble.*

10 Stability and reactivity

Thermal decomposition / conditions to be avoided: *No decomposition if used according to specifications.*
Materials to be avoided: *Strong acids, strong oxidizers.*
Dangerous reactions *No dangerous reactions known.*

(Contd. on page 5)

Material Safety Data Sheet

acc. to ISO/DIS 11014

Printing date 07/31/2003 Reviewed on 07/21/2003

Trade name: SOLDER ALLOYS CONTAINING LEAD

(Contd. of page 4)

Dangerous products of decomposition: *No dangerous decomposition products known.*

11 Toxicological information

Acute toxicity:
Primary irritant effect:
on the skin: No irritant effect.
on the eye: Smoke during soldering can cause eye irritation.
through inhalation: May cause respiratory irritation.
through ingestion: May be harmful if swallowed.
Sensitization: *No sensitizing effects known.*
Additional toxicological information:
The product shows the following dangers according to internally approved calculation methods for preparations: Harmful

12 Ecological information

General notes: *Do not allow product to reach ground water, water course or sewage system.*

13 Disposal considerations

Product:
Recommendation:
Must not be disposed of together with household garbage. Do not allow product to reach sewage system.

Uncleaned packagings:
Recommendation: *Disposal must be made according to official regulations.*

14 Transport information

DOT regulations:
Hazard class: -
Not regulated.

Land transport ADR/RID (cross-border):
ADR/RID class: -
Not regulated.

Maritime transport IMDG:
IMDG Class: -
Not regulated.
Marine pollutant: *No*

(Contd. on page 6)

Material Safety Data Sheet

acc. to ISO/DIS 11014

Printing date 07/31/2003 Reviewed on 07/21/2003

Trade name: SOLDER ALLOYS CONTAINING LEAD

(Contd. of page 5)

Air transport ICAO-TI and IATA-DGR:
ICAO/IATA Class: -
Not regulated.

15 Regulations

USA The following information relates to product regulation specific to the USA.

SARA (Superfund Amendments and Reauthorization Act)

Section 355 (extremely hazardous substances):
None of the ingredient is listed.

Section 313 (Specific toxic chemical listings):	
7439-92-1	*lead*
7440-36-0	*antimony*
7440-50-8	*copper*
7440-22-4	*silver*
7440-66-6	*Zinc*

TSCA (Toxic Substances Control Act):
All ingredients are listed.

California Proposition 65
Chemicals known to cause cancer:
WARNING: This product contains a chemical known to the State of California to cause cancer.

7439-92-1	*lead*
7440-43-9	*cadmium*
7440-02-0	*nickel*

Chemicals known to cause reproductive toxicity:
WARNING: This product contains a chemical known to the State of California to cause birth defects and/or other reproductive harm.

7439-92-1	*lead*
7440-43-9	*cadmium*

Carcinogenicity categories

EPA (Environmental Protection Agency)		
7439-92-1	*lead*	*B2*
7440-50-8	*copper*	*D*
7440-22-4	*silver*	*D*

IARC (International Agency for Research on Cancer)		
7439-92-1	*lead*	*2B*

NTP (National Toxicology Program)
None of the ingredients is listed.

TLV (Threshold Limit Value established by ACGIH)
None of the ingredients is listed.

(Contd. on page 7)

Material Safety Data Sheet

acc. to ISO/DIS 11014

Printing date 07/31/2003 Reviewed on 07/21/2003

Trade name: SOLDER ALLOYS CONTAINING LEAD

(Contd. of page 6)

NIOSH-Ca (National Institute for Occupational Safety and Health)
None of the ingredients is listed.

OSHA-Ca (Occupational Safety & Health Administration)
None of the ingredients is listed.

CANADA: The following information relates to product regulation specific to Canada.

Workplace Hazardous Materials Identification (WHMIS):
This product has been classified in accordance with the hazard criteria of the Canadian Controlled Products Regulation (CPR) and the MSDS contains all of the information required by the CPR.

WHMIS Classification:
D2A
D2B

Components on Ingredient List for WHMIS:
lead
tin
antimony
copper
silver

EUROPEAN UNION
The following information relates to product regulation specific to the directives of the Euopean Union.

Risk phrases:
Harmful by inhalation and if swallowed.
Danger of cumulative effects.
Possible risk of impaired fertility.

Safety phrases:
Keep out of the reach of children.
Wear suitable protective clothing and gloves.
If swallowed, seek medical advice immediately and show this container or label.
Dispose of this material and its container to hazardous or special waste collection point.

Special labeling of certain preparations:
Contains lead. Should not be used on surfaces liable to be chewed or sucked by children.

16 Other information

The information contained herein is based on data considered accurate and is offered solely for information, consideration and investigation. Kester extends no warranties, makes no representations and assumes no responsibilty as to the accuracy, completeness or suitability of this data for any purchaser's use. The data on this Material Safety Data Sheet relates only to this product and does not relate to use with any other material or in any process. All chemical products should be used only by, or under the direction of, technically qualified personnel who are aware of the hazards involved and the necessity for reasonable care in handling. Hazard communication regulations require that employees must be trained on how to use a Material Safety Data Sheet as a source for hazard information.

Department issuing MSDS: *Product Safety*
Contact: *Heather Holich, MSDS Coordinator* *Tel. (847)699-5755*

ATTACHMENT I.

Material Safety Data Sheet for 245 CORE from Kester
Reviewed on 04/04/2003.

Material Safety Data Sheet

acc. to ISO/DIS 11014

Printing date 07/25/2003 Reviewed on 04/04/2003

1 Identification of substance

Product details

Trade name: 245 CORE
Application of the substance / the preparation: Flux cored solder

Manufacturer/Supplier:
Kester
515 E. Touhy Ave.
Des Plaines, IL 60018
Tel.(847) 297-1600
Fax.(847) 390-9338

Information department:
MSDS Coordinator *Tel. (847) 699-5755*
Emergency information:
CHEMTREC 24-Hour Emergency Telephone Number: *(800)424-9300*
CHEMTREC 24-Hour Emergency Telephone Number (Outside of the U.S. and Canada): *(703)527-3887*

2 Composition/Data on components

Chemical characterization
Description: *Mixture of the substances listed below with nonhazardous additions.*

Dangerous components:		
7440-31-5	tin	0-100%
7439-92-1	lead	0-100%
7440-50-8	copper	0-100%
7440-36-0	antimony	0-100%
7440-22-4	silver	0-100%
7440-66-6	Zinc	0-100%
7440-69-9	bismuth	0-100%
65997-06-0	Modified Rosin	2.5-10%

Additional information:
Composition and weight percent of solder alloys varies widely and can be determined by product label.
Flux in core is typically 1-3% by weight.

3 Hazards identification

WHMIS Hazard Symbols

Information pertaining to particular dangers for man and environment:
The product has to be labelled due to the calculation procedure of international guidelines.
Harmful by inhalation and if swallowed.
Danger of cumulative effects.
May cause sensitisation by inhalation and skin contact.
Contains lead. Should not be used on surfaces liable to be chewed or sucked by children.

(Contd. on page 2)

Material Safety Data Sheet

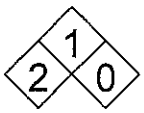
acc. to ISO/DIS 11014

Printing date 07/25/2003 Reviewed on 04/04/2003

Trade name: 245 CORE

(Contd. of page 1)

Classification system:
NFPA ratings (scale 0 - 4)



Health = 2
Fire = 1
Reactivity = 0

HMIS-ratings (scale 0 - 4)

HEALTH	2
FIRE	1
REACTIVITY	0

Health = 2
Fire = 1
Reactivity = 0

4 First aid measures

General information:
Symptoms of poisoning may even occur after several hours; therefore medical observation for at least 48 hours after the accident.
After inhalation: *Supply fresh air; consult doctor in case of complaints.*
After skin contact: *Immediately wash with water and soap and rinse thoroughly.*
After eye contact: *Rinse opened eye for several minutes under running water.*
After swallowing: *Induce vomiting, if person is conscious. Seek medical help.*

5 Fire fighting measures

Suitable extinguishing agents:
CO2, extinguishing powder or water spray. Fight larger fires with water spray or alcohol resistant foam.
Special hazards caused by the material, its products of combustion or resulting gases:
In case of fire, the following can be released:
Carbon monoxide (CO)
Carbon dioxide (CO2)
Aliphatic aldehydes
Melted solder above 1000°F will liberate toxic lead and/or antimony fumes.
Protective equipment: *Wear self-contained respiatory protective device.*
Additional information *Flux in cored solder may ignite when the solder melts in a fire.*

6 Accidental release measures

Person-related safety precautions: *Ensure adequate ventilation*
Measures for environmental protection: *Do not allow product to reach sewage system or any water course.*
Measures for cleaning/collecting:
Melted solder will solidify on cooling and can be scraped up. Use caution to avoid breathing fumes if a gas torch is used to cut up large pieces.

7 Handling and storage

Handling:
Information for safe handling: *Ensure good ventilation/exhaustion at the workplace.*

(Contd. on page 3)

Material Safety Data Sheet

acc. to ISO/DIS 11014

Printing date 07/25/2003 Reviewed on 04/04/2003

Trade name: 245 CORE

(Contd. of page 2)

Information about protection against explosions and fires: *Keep respiratory protective device available.*

Storage:
Requirements to be met by storerooms and receptacles: *No special requirements.*
Information about storage in one common storage facility: *Not required.*
Further information about storage conditions:
Store in dry conditions.
Exposure to sulfur or to high humidity will tarnish solder surface.

8 Exposure controls and personal protection

Additional information about design of technical systems: *No further data; see item 7.*

Components with limit values that require monitoring at the workplace:	
7440-31-5 tin	
PEL	2 mg/m³ Metal
REL	2 mg/m³ Tin, Metal
TLV	2 mg/m³
65997-06-0 Modified Rosin	
TLV	Short-term value: 3 mg/m³, NE ppm Long-term value: NE mg/m³, NE ppm
7440-50-8 copper	
PEL	0.1*;1** mg/m³ *fume **dusts & mists
REL	0.1*;1** mg/m³ *Copper fume, as Cu **Copper dusts & mists, as Cu
TLV	0.2*, 1** mg/m³ *fume; ** dusts&mists, as Cu
7439-92-1 lead	
PEL	0.05* mg/m³ as Pb
REL	<0.1* mg/m³ as Pb; *Blood Pb <0.06 mg/100 g whole blood
TLV	0.05 mg/m³ as Pb; BEI
7440-22-4 silver	
PEL	0.01 mg/m³
REL	0.01 mg/m³
TLV	0.1 mg/m³

Additional information:
PEL = Permissible Exposure Limit (OSHA)
REL= Recommended Exposure Limit (NIOSH)
TLV= Threshold Limit Value (ACGIH)
OSHA= Occupational Safety and Health Administration
ACGIH= American Conference of Governmental Industrial Hygienists
NIOSH= National Institute for Occupational Safety and Health

(Contd. on page 4)

Material Safety Data Sheet

acc. to ISO/DIS 11014

Printing date 07/25/2003 Reviewed on 04/04/2003

Trade name: 245 CORE

(Contd. of page 3)

Personal protective equipment:
General protective and hygienic measures:
Keep away from foodstuffs, beverages and feed.
Immediately remove all soiled and contaminated clothing.
Wash hands before breaks and at the end of work.
Store protective clothing separately.
Breathing equipment:
When ventilation is not sufficient to remove fumes from the breathing zone, a safety approved respirator or self-contained breathing apparatus should be worn.
Protection of hands:

Protective gloves

Material of gloves:
Cloth gloves
Nitrile rubber, NBR
Natural rubber, NR
Penetration time of glove material:
The exact break trough time has to be found out by the manufacturer of the protective gloves and has to be observed.
Eye protection:

Tightly sealed goggles

Safety glasses

9 Physical and chemical properties

General Information

Form:	*Solid material*
Color:	*Silver grey*
Odor:	*Odorless*

Change in condition
Melting point/Melting range: *> 100°C (> 212°F)*

Flash point: *Not applicable.*

Danger of explosion: *Product does not present an explosion hazard.*

Density at 20°C (68°F): *> 7 g/mL*

Solubility in / Miscibility with
Water: *Insoluble.*

USA

(Contd. on page 5)

Material Safety Data Sheet

acc. to ISO/DIS 11014

Printing date 07/25/2003 Reviewed on 04/04/2003

Trade name: 245 CORE

(Contd. of page 4)

10 Stability and reactivity

Thermal decomposition / conditions to be avoided: *No decomposition if used according to specifications.*
Materials to be avoided: *Strong acids, strong oxidizers.*
Dangerous reactions *No dangerous reactions known.*
Dangerous products of decomposition:
When heated to soldering temperatures, the solvents are evaporated and rosin may be thermally degraded to liberate aliphatic aldehydes and acids.

11 Toxicological information

Acute toxicity:

LD/LC50 values that are relevant for classification:		
65997-06-0 Modified Rosin		
Oral	*LD50*	*> 4.000 mg/kg (Rat)*

Primary irritant effect:
on the skin: Possible local irritation by contact with flux or fumes.
on the eye: Smoke during soldering can cause eye irritation.
through inhalation:
Flux fumes during soldering may cause irritation and damage of mucous membranes and respiratory system.
through ingestion: May be harmful if swallowed.
Sensitization:
Sensitization possible through inhalation.
Sensitization possible through skin contact.
Additional toxicological information:
The product shows the following dangers according to internally approved calculation methods for preparations:
Harmful
Irritant

12 Ecological information

General notes: *Do not allow product to reach ground water, water course or sewage system.*

13 Disposal considerations

Product:
Recommendation:
Must not be disposed of together with household garbage. Do not allow product to reach sewage system.

Uncleaned packagings:
Recommendation: *Disposal must be made according to official regulations.*

USA

(Contd. on page 6)

Material Safety Data Sheet

acc. to ISO/DIS 11014

Printing date 07/25/2003 Reviewed on 04/04/2003

Trade name: 245 CORE

(Contd. of page 5)

14 Transport information

DOT regulations:
Hazard class: -
Not regulated.

Land transport ADR/RID (cross-border):
ADR/RID class: -
Not regulated.

Maritime transport IMDG:
IMDG Class: -
Not regulated.
Marine pollutant: *No*

Air transport ICAO-TI and IATA-DGR:
ICAO/IATA Class: -
Not regulated.

15 Regulations

USA The following information relates to product regulation specific to the USA.

SARA (Superfund Amendments and Reauthorization Act)

Section 355 (extremely hazardous substances):	
None of the ingredient is listed.	

Section 313 (Specific toxic chemical listings):	
7439-92-1	*lead*
7440-36-0	*antimony*
7440-50-8	*copper*
7440-22-4	*silver*
7440-66-6	*Zinc*

TSCA (Toxic Substances Control Act):
All ingredients are listed.

California Proposition 65
Chemicals known to cause cancer:
WARNING: This product contains a chemical known to the State of California to cause cancer.

7439-92-1	*lead*
7440-43-9	*cadmium*
7440-02-0	*nickel*

Chemicals known to cause reproductive toxicity:
WARNING: This product contains a chemical known to the State of California to cause birth defects and/or other reproductive harm.

7439-92-1	*lead*
7440-43-9	*cadmium*

(Contd. on page 7)

Material Safety Data Sheet

acc. to ISO/DIS 11014

Printing date 07/25/2003 Reviewed on 04/04/2003

Trade name: 245 CORE

(Contd. of page 6)

Carcinogenicity categories

EPA (Environmental Protection Agency)		
7439-92-1	*lead*	*B2*
7440-50-8	*copper*	*D*
7440-22-4	*silver*	*D*

IARC (International Agency for Research on Cancer)		
7439-92-1	*lead*	*2B*

NTP (National Toxicology Program)
None of the ingredients is listed.

TLV (Threshold Limit Value established by ACGIH)
None of the ingredients is listed.

NIOSH-Ca (National Institute for Occupational Safety and Health)
None of the ingredients is listed.

OSHA-Ca (Occupational Safety & Health Administration)
None of the ingredients is listed.

CANADA: The following information relates to product regulation specific to Canada.

Workplace Hazardous Materials Identification (WHMIS):
This product has been classified in accordance with the hazard criteria of the Canadian Controlled Products Regulation (CPR) and the MSDS contains all of the information required by the CPR.

WHMIS Classification:
D2A
D2B

Components on Ingredient List for WHMIS:
tin
lead
copper
antimony
silver

EUROPEAN UNION
The following information relates to product regulation specific to the directives of the Euopean Union.

Risk phrases:
Harmful by inhalation and if swallowed.
Danger of cumulative effects.
May cause sensitisation by inhalation and skin contact.

Safety phrases:
Avoid exposure - obtain special instructions before use.
Keep locked up and out of the reach of children.
Do not breathe gas/fumes/vapour/spray (appropriate wording to be specified by the manufacturer).
Avoid contact with skin.
Do not empty into drains, dispose of this material and its container at hazardous or special waste collection point.
Wear suitable gloves and eye/face protection.
In case of accident or if you feel unwell, seek medical advice immediately (show the label where possible).

(Contd. on page 8)

Material Safety Data Sheet

acc. to ISO/DIS 11014

Printing date 07/25/2003 Reviewed on 04/04/2003

Trade name: 245 CORE

(Contd. of page 7)

In case of accident by inhalation: remove casualty to fresh air and keep at rest.

Special labeling of certain preparations:
Contains lead. Should not be used on surfaces liable to be chewed or sucked by children.

16 Other information

The information contained herein is based on data considered accurate and is offered solely for information, consideration and investigation. Kester extends no warranties, makes no representations and assumes no responsibilty as to the accuracy, completeness or suitability of this data for any purchaser's use. The data on this Material Safety Data Sheet relates only to this product and does not relate to use with any other material or in any process. All chemical products should be used only by, or under the direction of, technically qualified personnel who are aware of the hazards involved and the necessity for reasonable care in handling. Hazard communication regulations require that employees must be trained on how to use a Material Safety Data Sheet as a source for hazard information.

Department issuing MSDS: *Product Safety*
Contact: *Heather Holich, MSDS Coordinator* *Tel. (847)699-5755*

USA

ATTACHMENT J.

Material Safety Data Sheet for EP256 Sn55Pb45, Sn60Pb40, Sn62Pb38, Sn63Pb37, Sn65Pb35 from Kester Reviewed on 03/28/2003.

Material Safety Data Sheet

acc. to ISO/DIS 11014

Printing date 10/08/2003 Reviewed on 03/28/2003

1 Identification of substance

Product details

Trade name: **EP256 Sn55Pb45, Sn60Pb40, Sn62Pb38, Sn63Pb37, Sn65Pb35**
Application of the substance / the preparation: Solder paste

Manufacturer/Supplier:
Kester
515 E. Touhy Ave.
Des Plaines, IL 60018
Tel.(847) 297-1600
Fax.(847) 390-9338

Information department:
MSDS Coordinator *Tel. (847) 699-5755*
Emergency information:
CHEMTREC 24-Hour Emergency Telephone Number: *(800)424-9300*
CHEMTREC 24-Hour Emergency Telephone Number (Outside of the U.S. and Canada): *(703)527-3887*

2 Composition/Data on components

Chemical characterization
Description: *Mixture of the substances listed below with nonhazardous additions.*

Dangerous components:		
7440-31-5	*tin*	*50-100%*
7439-92-1	*lead*	*25-50%*
65997-05-9	*Rosin, polymerized*	*2.5-10%*

Additional information: *Solder powder is typically 85-92% of the solder paste composition.*

3 Hazards identification

WHMIS Hazard Symbols

Information pertaining to particular dangers for man and environment:
The product has to be labelled due to the calculation procedure of international guidelines.
May cause harm to the unborn child.
Harmful by inhalation and if swallowed.
Danger of cumulative effects.
May cause sensitisation by skin contact.
Possible risk of impaired fertility.
Contains lead. Should not be used on surfaces liable to be chewed or sucked by children.
Classification system:
NFPA ratings (scale 0 - 4)

Health = 2
Fire = 1
Reactivity = 0

(Contd. on page 2)

Material Safety Data Sheet

acc. to ISO/DIS 11014

Printing date 10/08/2003 Reviewed on 03/28/2003

Trade name: EP256 Sn55Pb45, Sn60Pb40, Sn62Pb38, Sn63Pb37, Sn65Pb35

(Contd. of page 1)

HMIS-ratings (scale 0 - 4)

HEALTH	*2	*Health = *2*
FIRE	1	*Fire = 1*
REACTIVITY	0	*Reactivity = 0*

4 First aid measures

After inhalation: *Supply fresh air; consult doctor in case of complaints.*
After skin contact: *Immediately wash with water and soap and rinse thoroughly.*
After eye contact: *Rinse opened eye for several minutes under running water.*
After swallowing: *Induce vomiting, if person is conscious. Seek medical help.*

5 Fire fighting measures

Suitable extinguishing agents:
CO2, extinguishing powder or water spray. Fight larger fires with water spray or alcohol resistant foam.
Special hazards caused by the material, its products of combustion or resulting gases:
Melted solder above 1000°F will liberate toxic lead and/or antimony fumes.
In case of fire, the following can be released:
Carbon monoxide (CO)
Carbon dioxide (CO2)
Aliphatic aldehydes
Protective equipment: *Wear self-contained respiatory protective device.*

6 Accidental release measures

Person-related safety precautions: *Ensure adequate ventilation*
Measures for environmental protection: *Do not allow product to reach sewage system or any water course.*
Measures for cleaning/collecting:
Scoop up paste and deposit in appropriate containers.
Dispose contaminated material as waste according to item 13.

7 Handling and storage

Handling:
Information for safe handling:
Wash hands after handling paste and before eating or smoking. Care should be taken to remove paste from under fingernails.
Ensure good ventilation/exhaustion at the workplace.
Information about protection against explosions and fires: *Keep respiratory protective device available.*

Storage:
Requirements to be met by storerooms and receptacles: *Store at or near 5°C in a dry location.*
Information about storage in one common storage facility: *Store away from oxidizing agents.*

(Contd. on page 3)

Material Safety Data Sheet

acc. to ISO/DIS 11014

Printing date 10/08/2003 Reviewed on 03/28/2003

Trade name: EP256 Sn55Pb45, Sn60Pb40, Sn62Pb38, Sn63Pb37, Sn65Pb35

(Contd. of page 2)

Further information about storage conditions: *Store in cool, dry conditions in well sealed receptacles.*

8 Exposure controls and personal protection

Additional information about design of technical systems: *No further data; see item 7.*

Components with limit values that require monitoring at the workplace:	
7440-31-5 tin	
PEL	*2 mg/m³* *Metal*
REL	*2 mg/m³* *Tin, Metal*
TLV	*2 mg/m³*
7439-92-1 lead	
PEL	*0.05* mg/m³* *as Pb*
REL	*<0.1* mg/m³* *as Pb; *Blood Pb <0.06 mg/100 g whole blood*
TLV	*0.05 mg/m³* *as Pb; BEI*

Personal protective equipment:

General protective and hygienic measures:

Keep away from foodstuffs, beverages and feed.
Immediately remove all soiled and contaminated clothing.
Wash hands before breaks and at the end of work.
Store protective clothing separately.

Breathing equipment:

In case of brief exposure or low pollution use respiratory filter device. In case of intensive or longer exposure use respiratory protective device that is independent of circulating air.

Protection of hands:

Protective gloves

Material of gloves:
Nitrile rubber, NBR
Natural rubber, NR
Penetration time of glove material:
The exact break trough time has to be found out by the manufacturer of the protective gloves and has to be observed.

Eye protection:

Tightly sealed goggles

Safety glasses

(Contd. on page 4)

Material Safety Data Sheet

acc. to ISO/DIS 11014

Printing date 10/08/2003 Reviewed on 03/28/2003

Trade name: EP256 Sn55Pb45, Sn60Pb40, Sn62Pb38, Sn63Pb37, Sn65Pb35

(Contd. of page 3)

9 Physical and chemical properties

General Information

Form: *Pasty*
Color: *Silver grey*
Odor: *Mild*

Change in condition
Melting point/Melting range: *> 100°C (> 212°F)*
Boiling point/Boiling range: *Undetermined.*

Flash point: *> 93°C (> 199°F)*

Ignition temperature: *> 260°C (> 500°F)*

Danger of explosion: *Product does not present an explosion hazard.*

Density at 20°C (68°F): *> 7 g/cm³*

Solubility in / Miscibility with
Water: *Insoluble.*

10 Stability and reactivity

Thermal decomposition / conditions to be avoided: *No decomposition if used according to specifications.*
Materials to be avoided: *Strong acids, strong oxidizers.*
Dangerous reactions *No dangerous reactions known.*
Dangerous products of decomposition:
When heated to soldering temperatures, the solvents are evaporated and rosin may be thermally degraded to liberate aliphatic aldehydes and acids.

11 Toxicological information

Acute toxicity:
Primary irritant effect:
on the skin: Possible local irritation by contact with flux or fumes.
on the eye: Smoke during soldering can cause eye irritation.
through inhalation:
Flux fumes during soldering may cause irritation and damage of mucous membranes and respiratory system.
through ingestion: May be harmful if swallowed.
Sensitization: *Sensitization possible through skin contact.*
Additional toxicological information:
The product shows the following dangers according to internally approved calculation methods for preparations:
Harmful
Irritant

(Contd. on page 5)

Material Safety Data Sheet

acc. to ISO/DIS 11014

Printing date 10/08/2003 Reviewed on 03/28/2003

Trade name: EP256 Sn55Pb45, Sn60Pb40, Sn62Pb38, Sn63Pb37, Sn65Pb35

(Contd. of page 4)

12 Ecological information

General notes:
Do not allow product to reach ground water, water course or sewage system.
Danger to drinking water if even small quantities leak into the ground.

13 Disposal considerations

Product:
Recommendation:
Must not be disposed of together with household garbage. Do not allow product to reach sewage system.
Disposal must be made according to official regulations.

Uncleaned packagings:
Recommendation: *Disposal must be made according to official regulations.*

14 Transport information

DOT regulations:
Hazard class: -
Not regulated.

Land transport ADR/RID (cross-border):
ADR/RID class: -
Not regulated.

Maritime transport IMDG:
IMDG Class: -
Not regulated.

Air transport ICAO-TI and IATA-DGR:
ICAO/IATA Class: -
Not regulated.

15 Regulations

USA The following information relates to product regulation specific to the USA.

SARA (Superfund Amendments and Reauthorization Act)

Section 355 (extremely hazardous substances):
None of the ingredient is listed.

Section 313 (Specific toxic chemical listings):	
7439-92-1	*lead*

TSCA (Toxic Substances Control Act):
All ingredients are listed.

(Contd. on page 6)

Material Safety Data Sheet

acc. to ISO/DIS 11014

Printing date 10/08/2003 Reviewed on 03/28/2003

Trade name: EP256 Sn55Pb45, Sn60Pb40, Sn62Pb38, Sn63Pb37, Sn65Pb35

(Contd. of page 5)

California Proposition 65

Chemicals known to cause cancer:

WARNING: This product contains a chemical known to the State of California to cause cancer.

7439-92-1	*lead*
7440-43-9	*cadmium*
7440-02-0	*nickel*

Chemicals known to cause reproductive toxicity:

WARNING: This product contains a chemical known to the State of California to cause birth defects and/or other reproductive harm.

7439-92-1	*lead*
872-50-4	*N-methyl-2-pyrrolidone*
7440-43-9	*cadmium*

Carcinogenicity categories

EPA (Environmental Protection Agency)		
7439-92-1	*lead*	*B2*

IARC (International Agency for Research on Cancer)		
7439-92-1	*lead*	*2B*

NTP (National Toxicology Program)
None of the ingredients is listed.

TLV (Threshold Limit Value established by ACGIH)
None of the ingredients is listed.

NIOSH-Ca (National Institute for Occupational Safety and Health)
None of the ingredients is listed.

OSHA-Ca (Occupational Safety & Health Administration)
None of the ingredients is listed.

CANADA: The following information relates to product regulation specific to Canada.

Workplace Hazardous Materials Identification (WHMIS):

This product has been classified in accordance with the hazard criteria of the Canadian Controlled Products Regulation (CPR) and the MSDS contains all of the information required by the CPR.

WHMIS Classification:

D2A

D2B

Components on Ingredient List for WHMIS:

tin

lead

EUROPEAN UNION

The following information relates to product regulation specific to the directives of the Euopean Union.

Risk phrases:

May cause harm to the unborn child.

Harmful by inhalation and if swallowed.

Danger of cumulative effects.

(Contd. on page 7)

Material Safety Data Sheet

acc. to ISO/DIS 11014

Printing date 10/08/2003 Reviewed on 03/28/2003

Trade name: EP256 Sn55Pb45, Sn60Pb40, Sn62Pb38, Sn63Pb37, Sn65Pb35

(Contd. of page 6)

May cause sensitisation by skin contact.
Possible risk of impaired fertility.

Safety phrases:
Avoid exposure - obtain special instructions before use.
Keep locked up and out of the reach of children.
Avoid contact with skin.
Do not empty into drains, dispose of this material and its container at hazardous or special waste collection point.
Wear suitable gloves and eye/face protection.
In case of accident or if you feel unwell, seek medical advice immediately (show the label where possible).

Special labeling of certain preparations:
Contains lead. Should not be used on surfaces liable to be chewed or sucked by children.

16 Other information

The information contained herein is based on data considered accurate and is offered solely for information, consideration and investigation. Kester extends no warranties, makes no representations and assumes no responsibilty as to the accuracy, completeness or suitability of this data for any purchaser's use. The data on this Material Safety Data Sheet relates only to this product and does not relate to use with any other material or in any process. All chemical products should be used only by, or under the direction of, technically qualified personnel who are aware of the hazards involved and the necessity for reasonable care in handling. Hazard communication regulations require that employees must be trained on how to use a Material Safety Data Sheet as a source for hazard information.

Department issuing MSDS: *Product Safety*
Contact: *Heather Holich, MSDS Coordinator* *Tel. (847)699-5755*

USA

ATTACHMENT K.

Material Safety Data Sheet for R276 Sn55Pb45, Sn60Pb40, Sn62Pb38, Sn63Pb37, Sn65Pb35 from Kester Reviewed on 04/08/2003.

Material Safety Data Sheet

acc. to ISO/DIS 11014

Printing date 08/01/2003 Reviewed on 04/08/2003

1 Identification of substance

Product details

Trade name: **R276 Sn55Pb45, Sn60Pb40, Sn62Pb38, Sn63Pb37, Sn65Pb35**
Application of the substance / the preparation: Solder paste

Manufacturer/Supplier:
Kester
515 E. Touhy Ave.
Des Plaines, IL 60018
Tel.(847) 297-1600
Fax.(847) 390-9338

Information department:
MSDS Coordinator *Tel. (847) 699-5755*
Emergency information:
CHEMTREC 24-Hour Emergency Telephone Number: *(800)424-9300*
CHEMTREC 24-Hour Emergency Telephone Number (Outside of the U.S. and Canada): *(703)527-3887*

2 Composition/Data on components

Chemical characterization
Description: *Mixture of the substances listed below with nonhazardous additions.*

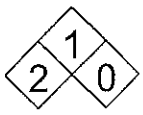
Dangerous components:		
7440-31-5	*tin*	*50-100%*
7439-92-1	*lead*	*25-50%*
65997-05-9	*Rosin, polymerized*	*2.5-10%*

Additional information: *Solder powder is typically 85-92% of the solder paste composition.*

3 Hazards identification

WHMIS Hazard Symbols

Information pertaining to particular dangers for man and environment:
The product has to be labelled due to the calculation procedure of international guidelines.
Harmful by inhalation and if swallowed.
Danger of cumulative effects.
May cause sensitisation by skin contact.
Possible risk of impaired fertility.
Contains lead. Should not be used on surfaces liable to be chewed or sucked by children.
Classification system:
NFPA ratings (scale 0 - 4)



Health = 2
Fire = 1
Reactivity = 0

(Contd. on page 2)

Material Safety Data Sheet

acc. to ISO/DIS 11014

Printing date 08/01/2003 Reviewed on 04/08/2003

Trade name: R276 Sn55Pb45, Sn60Pb40, Sn62Pb38, Sn63Pb37, Sn65Pb35

(Contd. of page 1)

HMIS-ratings (scale 0 - 4)

HEALTH	*2	*Health = *2*
FIRE	1	*Fire = 1*
REACTIVITY	0	*Reactivity = 0*

4 First aid measures

General information:
Symptoms of poisoning may even occur after several hours; therefore medical observation for at least 48 hours after the accident.
After inhalation: *Supply fresh air; consult doctor in case of complaints.*
After skin contact: *Immediately wash with water and soap and rinse thoroughly.*
After eye contact: *Rinse opened eye for several minutes under running water.*
After swallowing: *Induce vomiting, if person is conscious. Seek medical help.*

5 Fire fighting measures

Suitable extinguishing agents:
CO2, extinguishing powder or water spray. Fight larger fires with water spray or alcohol resistant foam.
Special hazards caused by the material, its products of combustion or resulting gases:
Melted solder above 1000°F will liberate toxic lead and/or antimony fumes.
In case of fire, the following can be released:
Carbon monoxide (CO)
Carbon dioxide (CO2)
Aliphatic aldehydes
Protective equipment: *Wear self-contained respiatory protective device.*

6 Accidental release measures

Person-related safety precautions: *Ensure adequate ventilation*
Measures for environmental protection: *Do not allow product to reach sewage system or any water course.*
Measures for cleaning/collecting: *Scoop up paste and deposit in appropriate containers.*

7 Handling and storage

Handling:
Information for safe handling: *Ensure good ventilation/exhaustion at the workplace.*
Information about protection against explosions and fires: *Keep respiratory protective device available.*

Storage:
Requirements to be met by storerooms and receptacles: *Store at or near 5°C in a dry location.*
Information about storage in one common storage facility: *Not required.*
Further information about storage conditions: *Store in cool, dry conditions in well sealed receptacles.*

(Contd. on page 3)

Material Safety Data Sheet

acc. to ISO/DIS 11014

Printing date 08/01/2003 Reviewed on 04/08/2003

Trade name: R276 Sn55Pb45, Sn60Pb40, Sn62Pb38, Sn63Pb37, Sn65Pb35

(Contd. of page 2)

8 Exposure controls and personal protection

Additional information about design of technical systems: *No further data; see item 7.*

Components with limit values that require monitoring at the workplace:	
7440-31-5 tin	
PEL	*2 mg/m³* *Metal*
REL	*2 mg/m³* *Tin, Metal*
TLV	*2 mg/m³*
7439-92-1 lead	
PEL	*0.05* mg/m³* *as Pb*
REL	*<0.1* mg/m³* *as Pb; *Blood Pb <0.06 mg/100 g whole blood*
TLV	*0.05 mg/m³* *as Pb; BEI*

Additional information:
PEL = Permissible Exposure Limit (OSHA)
REL= Recommended Exposure Limit (NIOSH)
TLV= Threshold Limit Value (ACGIH)
OSHA= Occupational Safety and Health Administration
ACGIH= American Conference of Governmental Industrial Hygienists
NIOSH= National Institute for Occupational Safety and Health

Personal protective equipment:
General protective and hygienic measures:
Keep away from foodstuffs, beverages and feed.
Immediately remove all soiled and contaminated clothing.
Wash hands before breaks and at the end of work.
Store protective clothing separately.
Breathing equipment:
When ventilation is not sufficient to remove fumes from the breathing zone, a safety approved respirator or self-contained breathing apparatus should be worn.
Protection of hands:

Protective gloves

Material of gloves:
Nitrile rubber, NBR
Natural rubber, NR
Penetration time of glove material:
The exact break trough time has to be found out by the manufacturer of the protective gloves and has to be observed.
Eye protection:

Tightly sealed goggles

(Contd. on page 4)

Material Safety Data Sheet

acc. to ISO/DIS 11014

Printing date 08/01/2003 Reviewed on 04/08/2003

Trade name: R276 Sn55Pb45, Sn60Pb40, Sn62Pb38, Sn63Pb37, Sn65Pb35

(Contd. of page 3)

Safety glasses

9 Physical and chemical properties

General Information

Form:	*Pasty*
Color:	*Silver grey*
Odor:	*Mild*

Change in condition

Melting point/Melting range:	*> 100°C (> 212°F)*
Boiling point/Boiling range:	*Undetermined.*

Flash point:	*> 93°C (> 199°F)*
Ignition temperature:	*> 260°C (> 500°F)*
Danger of explosion:	*Product does not present an explosion hazard.*
Density at 20°C (68°F):	*> 7 g/cm³*
Solubility in / Miscibility with ***Water:***	*Not miscible or difficult to mix.*

10 Stability and reactivity

Thermal decomposition / conditions to be avoided: *No decomposition if used according to specifications.*
Materials to be avoided: *Strong acids, strong oxidizers.*
Dangerous reactions *No dangerous reactions known.*
Dangerous products of decomposition:
When heated to soldering temperatures, the solvents are evaporated and rosin may be thermally degraded to liberate aliphatic aldehydes and acids.

11 Toxicological information

Acute toxicity:
Primary irritant effect:
on the skin: Possible local irritation by contact with flux or fumes.
on the eye: Smoke during soldering can cause eye irritation.
through inhalation:
Flux fumes during soldering may cause irritation and damage of mucous membranes and respiratory system.
through ingestion: May be harmful if swallowed.
Sensitization: *Sensitization possible through skin contact.*
Additional toxicological information:
The product shows the following dangers according to internally approved calculation methods for preparations:
Harmful

(Contd. on page 5)

Material Safety Data Sheet

acc. to ISO/DIS 11014

Printing date 08/01/2003 Reviewed on 04/08/2003

Trade name: R276 Sn55Pb45, Sn60Pb40, Sn62Pb38, Sn63Pb37, Sn65Pb35

(Contd. of page 4)

Irritant

12 Ecological information

General notes:
Do not allow product to reach ground water, water course or sewage system.
Danger to drinking water if even small quantities leak into the ground.

13 Disposal considerations

Product:
Recommendation:
Must not be disposed of together with household garbage. Do not allow product to reach sewage system.

Uncleaned packagings:
Recommendation: *Disposal must be made according to official regulations.*

14 Transport information

DOT regulations:
Hazard class: -
Not regulated.

Land transport ADR/RID (cross-border):
ADR/RID class: -
Not regulated.

Maritime transport IMDG:
IMDG Class: -
Not regulated.

Air transport ICAO-TI and IATA-DGR:
ICAO/IATA Class: -
Not regulated.

15 Regulations

USA The following information relates to product regulation specific to the USA.

SARA (Superfund Amendments and Reauthorization Act)

Section 355 (extremely hazardous substances):
None of the ingredient is listed.

Section 313 (Specific toxic chemical listings):	
7439-92-1	*lead*

(Contd. on page 6)

Material Safety Data Sheet

acc. to ISO/DIS 11014

Printing date 08/01/2003 Reviewed on 04/08/2003

Trade name: R276 Sn55Pb45, Sn60Pb40, Sn62Pb38, Sn63Pb37, Sn65Pb35

(Contd. of page 5)

TSCA (Toxic Substances Control Act):

All ingredients are listed.

California Proposition 65

Chemicals known to cause cancer:

WARNING: This product contains a chemical known to the State of California to cause cancer.

7439-92-1	*lead*
7440-43-9	*cadmium*
7440-02-0	*nickel*

Chemicals known to cause reproductive toxicity:

WARNING: This product contains a chemical known to the State of California to cause birth defects and/or other reproductive harm.

7439-92-1	*lead*
872-50-4	*N-methyl-2-pyrrolidone*
7440-43-9	*cadmium*

Carcinogenicity categories

EPA (Environmental Protection Agency)		
7439-92-1	*lead*	*B2*

IARC (International Agency for Research on Cancer)		
7439-92-1	*lead*	*2B*

NTP (National Toxicology Program)
None of the ingredients is listed.

TLV (Threshold Limit Value established by ACGIH)
None of the ingredients is listed.

NIOSH-Ca (National Institute for Occupational Safety and Health)
None of the ingredients is listed.

OSHA-Ca (Occupational Safety & Health Administration)
None of the ingredients is listed.

CANADA: The following information relates to product regulation specific to Canada.

Workplace Hazardous Materials Identification (WHMIS):

This product has been classified in accordance with the hazard criteria of the Canadian Controlled Products Regulation (CPR) and the MSDS contains all of the information required by the CPR.

WHMIS Classification:

D2A

D2B

Components on Ingredient List for WHMIS:

tin

lead

EUROPEAN UNION

The following information relates to product regulation specific to the directives of the Euopean Union.

(Contd. on page 7)

Material Safety Data Sheet

acc. to ISO/DIS 11014

Printing date 08/01/2003 Reviewed on 04/08/2003

Trade name: R276 Sn55Pb45, Sn60Pb40, Sn62Pb38, Sn63Pb37, Sn65Pb35

(Contd. of page 6)

Risk phrases:
Harmful by inhalation and if swallowed.
Danger of cumulative effects.
May cause sensitisation by skin contact.
Possible risk of impaired fertility.

Safety phrases:
Avoid exposure - obtain special instructions before use.
Keep locked up and out of the reach of children.
Avoid contact with skin.
Do not empty into drains, dispose of this material and its container at hazardous or special waste collection point.
Wear suitable gloves and eye/face protection.
In case of accident or if you feel unwell, seek medical advice immediately (show the label where possible).

Special labeling of certain preparations:
Contains lead. Should not be used on surfaces liable to be chewed or sucked by children.

16 Other information

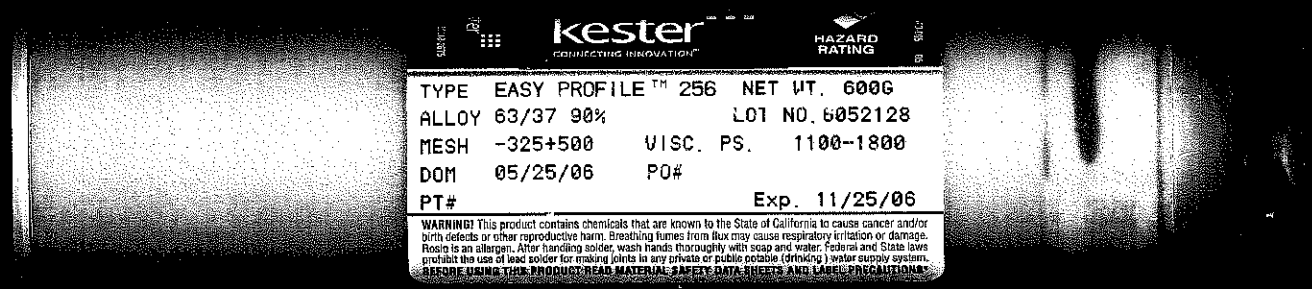
The information contained herein is based on data considered accurate and is offered solely for information, consideration and investigation. Kester extends no warranties, makes no representations and assumes no responsibilty as to the accuracy, completeness or suitability of this data for any purchaser's use. The data on this Material Safety Data Sheet relates only to this product and does not relate to use with any other material or in any process. All chemical products should be used only by, or under the direction of, technically qualified personnel who are aware of the hazards involved and the necessity for reasonable care in handling. Hazard communication regulations require that employees must be trained on how to use a Material Safety Data Sheet as a source for hazard information.

Department issuing MSDS: *Product Safety*
Contact: *Heather Holich, MSDS Coordinator* *Tel. (847)699-5755*

USA

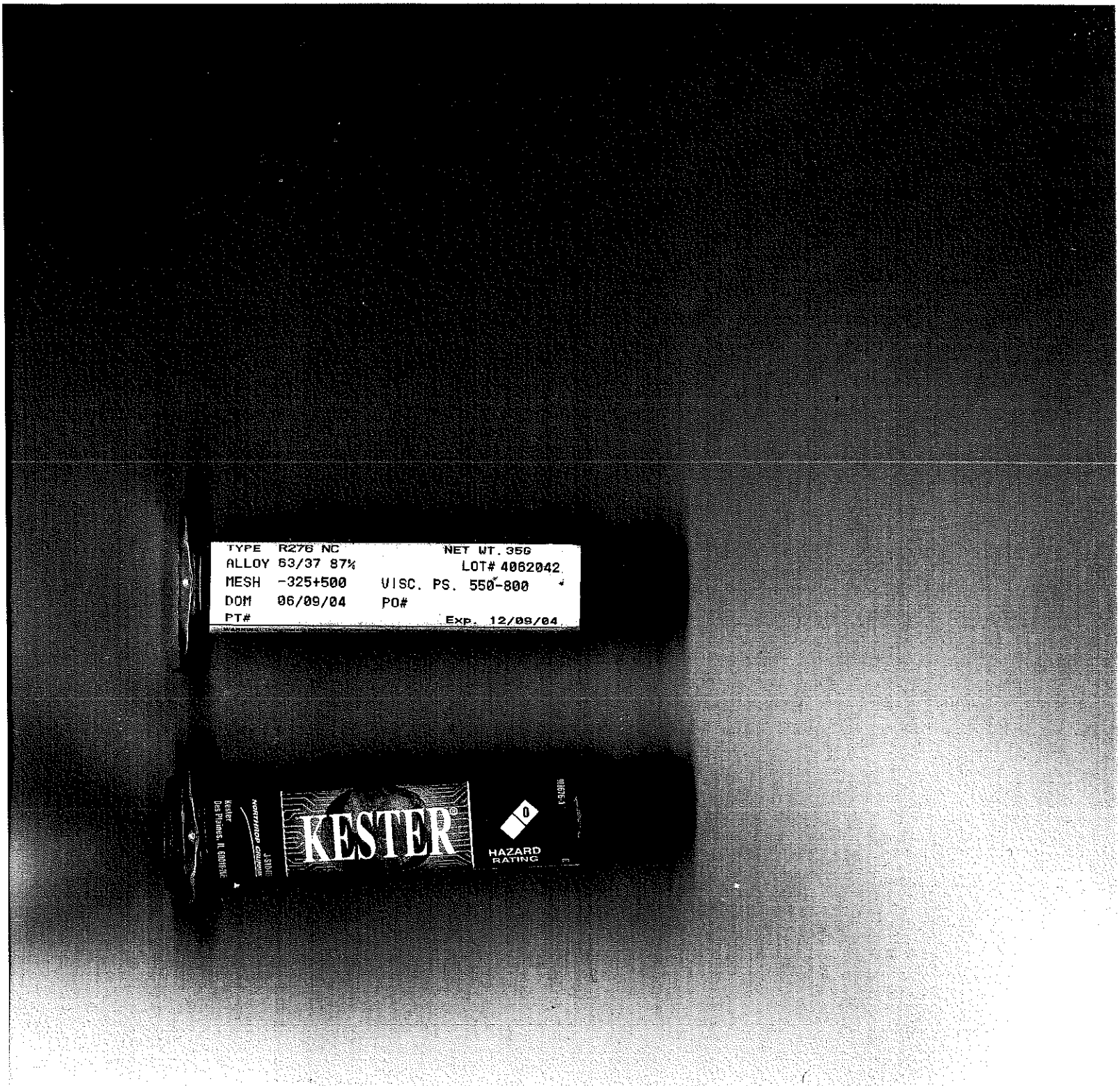
ATTACHMENT L.

Copy of Label from Kester Type Easy Profile 256.


kester
CONNECTING INNOVATION
HAZARD RATING
TYPE EASY PROFILE™ 256 NET WT. 600G
ALLOY 63/37 90% LOT NO. 6052128
MESH -325+500 VISC. PS. 1100-1800
DOM 05/25/06 PO#
PT# Exp. 11/25/06
WARNING! This product contains chemicals that are known to the State of California to cause cancer and/or birth defects or other reproductive harm. Breathing fumes from flux may cause respiratory irritation or damage. Rosin is an allergen. After handling solder, wash hands thoroughly with soap and water. Federal and State laws prohibit the use of lead solder for making joints in any private or public potable (drinking) water supply system.
BEFORE USING THIS PRODUCT READ MATERIAL SAFETY DATA SHEETS AND LABEL PRECAUTIONS

ATTACHMENT M.

Copy of Label from Kester Type R276 NC.

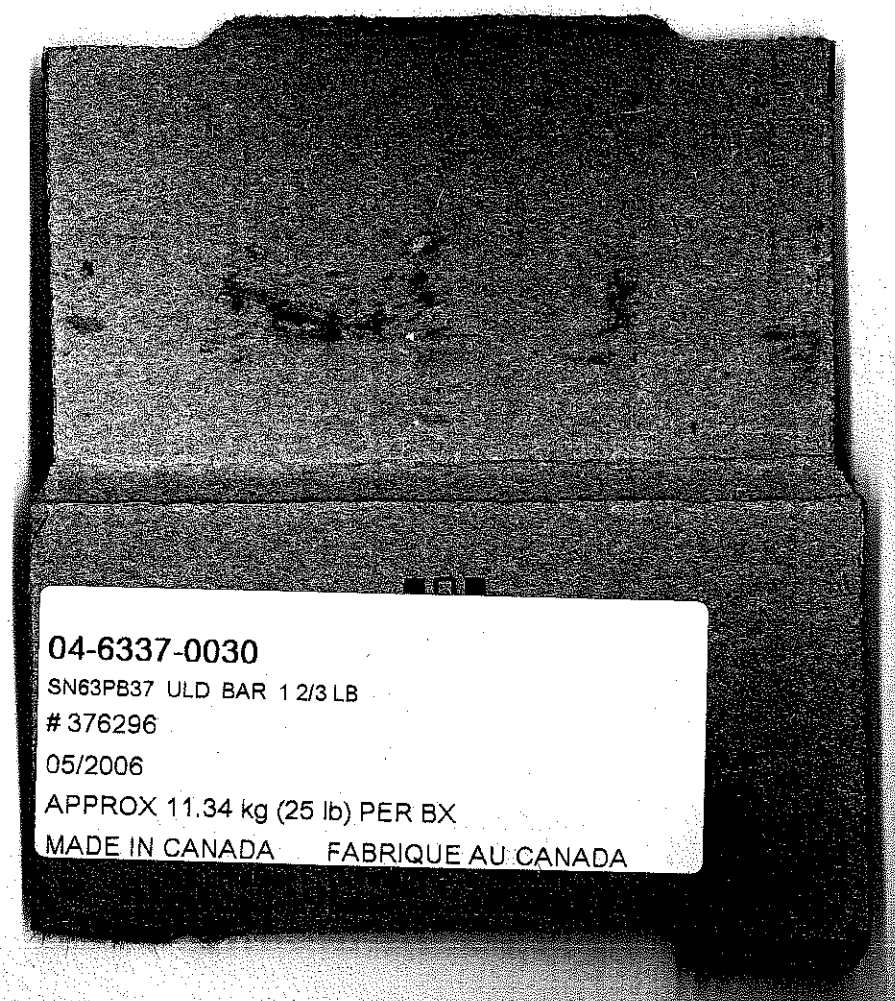

TYPE R276 NC
NET WT. 35G
ALLOY 63/37 87%
LOT# 4062042
MESH -325+500
VISC. PS. 550-800
DOM 06/09/04
PO#
PT#
Exp. 12/09/04
KESTER
HAZARD
RATING

ATTACHMENT N.

Copy of Label from End of Carton containing Kester SN63PB37 ULD Bar, plus copy of Kester Ultra Low Dross bar.

Kester Ultra Low Dross

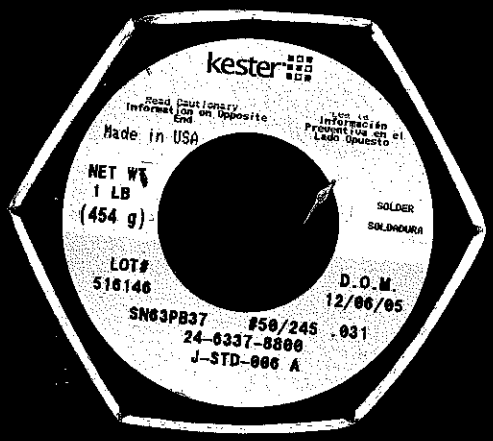
Sn63Pb37 JSD 006 A



ATTACHMENT O.

Copy of Labels from end of Kester Wire Solder Roll.

KESTER
Read Cautionary Information on Opposite End
Lea la Información Preventiva en el Lado Opuesto
Made in USA
NET WT
1 LB
(454 g)
SOLDER
SOLDADURA
LOT#
514065
D.O.M.
06/28/05
SN63PB37
#50/245 .015
24-6337-8806
J-STD-006 A


kester
Read Cautionary Information on Opposite End
Lea la Información Preventiva en el Lado Opuesto
Made in USA
NET WT
1 LB
(454 g)
SOLDER
SOLDADURA
LOT#
516146
D.O.M.
12/06/05
SN63PB37
#50/245 .031
24-6337-8806
J-STD-006 A

ATTACHMENT P.

Copy of Product Information Brochure from Kester for 245 No-Clean Cored Wire.

Cory Steeby
<csteeby@ebw-electronics.com>

To

Subject RE: Email Check

07/12/2006 03:27 PM

History: This message has been replied to.

Hi John

Interesting that the epamail prefix shows up in the address....

At any rate, attached is the specification for the wire solder that we discussed. Please let me know if you require any further information.

Kind Regards,
Cory Steeby
616 786 0575 x14

-----Original Message-----
From: Myhre.John@epamail.epa.gov [mailto:Myhre.John@epamail.epa.gov]
Sent: Wednesday, July 12, 2006 4:27 PM
To: csteeby@ebw-electronics.com
Subject: Email Check

Here it is. You should be able to reply to this email with the information.

John Myhre

245%20Global%20(06Feb06).pdf

kester®
CONNECTING INNOVATION™

RoHS Ready

245
No-Clean Cored Wire

Product Description

Kester 245 No-clean Cored Wire was developed to complement low residue liquid fluxes being used by the electronics industry. The chemistry is based on some of the same principles that have been safely used for years in mildly activated rosin fluxes. The use of 245 No-clean Cored Wire results in visually acceptable assemblies without cleaning, yet soldering quality and efficiency is comparable to that obtained with mildly activated rosin flux. Kester 245 was formerly classified as Type LR per MIL-F-14256. Kester 245 is Bellcore GR-78 compliant.

Performance Characteristics:

- Highly reliable post-soldering residue
- Minimal residue
- Compatible with leaded and lead-free alloys
- Classified as ROL0 per J-STD-004
- Compliant to Bellcore GR-78

RoHS Compliance

This product meets the requirements of the RoHS (Restriction of Hazardous Substances) Directive, 2002/95/EC Article 4 for the stated banned substances. (Applies only if this core flux is combined with a lead free alloy)

Reliability Properties

Copper Mirror Corrosion: Low
Tested to J-STD-004, IPC-TM-650, Method 2.3.32

Corrosion Test: Low
Tested to J-STD-004, IPC-TM-650, Method 2.6.15

Silver Chromate: Pass
Tested to J-STD-004, IPC-TM-650, Method 2.3.33

Chloride and Bromides: None Detected
Tested to J-STD-004, IPC-TM-650, Method 2.3.35

Fluorides by Spot Test: Pass
Tested to J-STD-004, IPC-TM-650, Method 2.3.35.1

SIR, IPC (typical): Pass
Tested to J-STD-004, IPC-TM-650, Method 2.6.3.3

	Blank	245
Day 1	$1.2 \times 10^{10}\ \Omega$	$1.7 \times 10^{9}\ \Omega$
Day 4	$9.4 \times 10^{9}\ \Omega$	$1.9 \times 10^{9}\ \Omega$
Day 7	$8.6 \times 10^{9}\ \Omega$	$2.1 \times 10^{9}\ \Omega$

Spread Test (typical):
Tested to J-STD-004, IPC-TM-650, Method 2.4.46

	Area of Spread mm^2 (in^2)
Flux Core Solder	Sn63Pb37
Plastic Rosin Core	194 (0.30)
285 Mildly Activated Rosin	335 (0.52)
245 No-Clean	348 (0.54)

Application Notes

Availability:

Kester 245 is available in a wide variety of alloys, wire diameters and flux percentages. For most applications, Sn63Pb37 is used. Consult the alloy temperature chart in Kester's product catalog for a comprehensive alloy list. The standard wire diameter for most applications is 1.00mm (0.031in). Wire diameters range from 0.25 - 6.00mm (0.010 to 0.250in). A "Standard Wire Diameters" chart also is also included in Kester's product catalog. The amount of flux in the wire dictates the ease of soldering for an application. For tin/lead applications, core 50 or 58 (1.1 and 2.2% flux by weight) are recommended. Kester 245 is packaged on spools of different sizes to accommodate a variety of applications.

Process Considerations:

Solder iron tip temperatures should range between 260-370°C (500-700°F) for Sn63Pb37 and Sn62Pb36Ag02 alloys. Heat both the land area and component lead to be soldered with the iron prior to adding Kester 245 cored wire. Apply the solder wire to the land area or component lead. Do not apply the wire directly to the soldering iron tip. If needed, Kester 951 or 952-D6 no clean flux may be used as a compatible liquid flux to aid in reworking soldered joints. Kester 951 and 952-D6 are available in flux pens for optimum board cleanliness.

Cleaning:

The flux residues left by the 245 core flux are non-corrosive, non-conductive and do not require removal in most applications. If residue removal is required, call Kester Technical Support.

Storage, Handling, and Shelf Life:

Storage must be in a dry, non-corrosive environment. The surface may lose its shine and appear a dull shade of grey. This is a surface phenomena and is not detrimental to product functionality. Flux cored solder wire has a limited shelf life determined by the alloy used in the wire. For alloys containing > 70% lead, the shelf life is two years from date of manufacture. Other alloys have a shelf life of three years from date of manufacture.

Health & Safety:

This product, during handling or use, may be hazardous to health or the environment. Read the Material Safety Data Sheet and warning label before using this product.

World Headquarters: 515 E. Touhy Avenue, Des Plaines, Illinois, 60018 USA
Phone: (+1) 847-297-1600 • **Email**: customerservice@kester.com • **Website**: www.kester.com

Asia Pacific Headquarters
500 Chai Chee Lane
Singapore 469024
(+65) 6449-1133
customerservice@kester.com.sg

European Headquarters
Ganghoferstrasse 45
D-82216 Gernlinden
Germany
(+49) 8142-47850
customerservice@kester-eu.com

Japanese Headquarters
20-11 Yokokawa 2-Chome
Sumida-Ku
Tokyo 130-0003 Japan
(+81) 3-3624-5351
jpsales@kester.com.sg

The data recommendations presented are based on tests, which we consider reliable. Because Kester has no control over the conditions of use, we disclaim any responsibility connected with the use of any of our products or the information presented. We advise that all chemical products be used only by or under the direction of technically qualified personnel who are aware of the potential hazards involved and the necessity for reasonable care in their handling. The technical information contained herein is consistent with the properties of this material but should not be used in the preparation of specifications as it is intended for reference only. For assistance in preparing specifications, please contact your local Kester office for details.

Rev: 06Feb06

ATTACHMENT Q.

Receipt for Samples and Documents

RECEIPT FOR SAMPLES AND DOCUMENTS

U.S. ENVIRONMENTAL PROTECTION AGENCY
Emergency Planning and Community Right-to-Know Act of 1986
(SARA Title III)

1. INVESTIGATION IDENTIFICATION			3. FIRM NAME
DATE: 4 April 2006	INSPECTOR NO.: FEP57	DAILY SEQ. NO.: 1	EBW Electronics

4. INSPECTOR ADDRESS	5. FIRM ADDRESS
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5, DT-8J 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590	13110 Ransom St. Holland, MI 49424

The documents and samples of chemical substances and/or mixtures described below were collected in connection with the administration and enforcement of the Emergency Planning and Community Right-to-Know Act of 1986.

RECEIPT OF THE DOCUMENT(S) AND/OR SAMPLES DESCRIBED IS HEREBY ACKNOWLEDGED:

NO.	DESCRIPTION
	Documentation for calendar year 2004, listed in items 1, 2, 3, and 4 below, is to be submitted by April 28, 2005
1	Purchase Invoices for lead based solders for listed EPCRA 313 toxic chemicals and/or chemical categories or mixtures containing listed EPCRA 313 toxic chemicals and/or toxic chemical categories used by the facility in calendar year 2004
2	MSDS sheets & copies of product labels for lead-based solders for listed EPCRA Section 313 toxic chemicals and/or toxic chemical categories or mixtures containing listed EPCRA Section 313 toxic chemicals and/or toxic chemical categories used by the facility. If the supplier notification is not dated as applicable to calendar year ~~2004~~, a document is needed stating that the documentation submitted is applicable to calendar year 2004
3	Documentation of the facility usage calculations, including methodology, utilized to determine usage of listed EPCRA Section 313 toxic chemicals or toxic chemical categories.
4	~~Documentation of the determination of the Activity (Manufacture Use, Process Use, and/or Otherwise Use) of each listed EPCRA Section 313 toxic chemical or toxic chemical category used during calendar year ___~~

INSPECTOR SIGNATURE	RECIPIENT SIGNATURE
John D. Myhre	[illegible]
NAME: John D. Myhre	NAME: J Cory Steeby
TITLE: EPCRA Compliance Inspector DATE SIGNED: 4 April 2006	TITLE: President DATE SIGNED: 4.4.06

"Lisa Slenk"
<lslenk@ebw-electronics.com
>
06/12/2008 10:58 AM

To Estrella Calvo/R5/USEPA/US@EPA
cc
bcc

Subject FW: Final Project Status Report

Hi Estrella,

Here is a copy of the cancelled check. Let me know if you need anything else.

~ Lisa

-----Original Message-----
From: Calvo.Estrella@epamail.epa.gov [mailto:Calvo.Estrella@epamail.epa.gov]

Sent: Thursday, June 12, 2008 11:28 AM
To: Lisa Slenk
Subject: Re: Final Project Status Report

Hi Lisa,

The final report does not include the cancelled check(s) for Respondent's SEP Funds, per paragraph 42 of the CAFO, Docket No. EPCRA-05-2007-0036. Please send copies to me via e-mail or US mail.

Best Regards,
Estrella Calvo
Environmental Scientist
Pesticides and Toxics Compliance Section
U.S. EPA - Region 5 (LC-8J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Phone (312)353-8931
Fax (312)353-4788

"Lisa Slenk"
<lslenk@ebw-elec
tronics.com>
06/12/2008 09:51
AM

To
Estrella Calvo/R5/USEPA/US@EPA
cc

Subject
Final Project Status Report

Hello!

Here is the Final Project Status Report you requested. If you need anything else let me know.

~ Lisa

(Embedded image moved to file: pic15179.gif)

Lisa Slenk
Accounting Supervisor
EBW Electronics, Inc.
13110 Ransom Street
Holland, MI 49424
616-786-0575 ext 30

The information contained in or disclosed by this document is considered proprietary by EBW Electronics, Inc. This document and the items and information contained or disclosed herein shall not be used, copied, or reproduced in whole or in part, nor shall the contents be revealed in any manner to any person unless written permission is obtained from EBW Electronics, Inc. If you have received this communication in error, please notify us immediately by e-mail or by telephone at (616) 786-0575.

(See attached file: 20080612113954997.pdf)

pic15179.gif 20080612113954997.pdf 20080612124826995.pdf

041000014
12/07/2007
6313331678

This is a LEGAL COPY of your check. You can use it the same way you would use the original check.

⑆0749099623⑆ 12/06/2007
003120808776

THIS CHECK IS PRINTED WITH A BLUE BACKGROUND AND AN ORIGINAL DOCUMENT SECURITY BACKER

EBW ELECTRONICS

EBW ELECTRONICS
13110 Ransom Street
HOLLAND, MI 49424
PHONE: (616) 786-0575
TAX ID# 38-3071750

56-389/412

National City Bank
Ashland, Ohio

CHECK DATE	CHECK NO
12/4/07	38193
CHECK AMOUNT	
11,509.00	

Eleven Thousand Five Hundred Nine and 00/100

TO THE ORDER OF State of Michigan

Luanne Cook
AUTHORIZED SIGNATURE
Healthy Homes Section

⑈038193⑈ ⑆041203895⑆ 2000000499⑈ 190 70090 8 0001150900⑈

⑈038193⑈ 4⑆041203895⑆ 2000000499⑈ ⑈0001150900⑈

041000014 12/07/2007
6313331678

↓Do not endorse or write below this line.↓

ENDORSE HERE

FOR DEPOSIT ONLY
STATE TREASURER
STATE OF MICHIGAN
MICHIGAN DEPT. OF COMMUNITY HEALTH

DO NOT WRITE, STAMP OR SIGN BELOW THIS LINE
RESERVED FOR FINANCIAL INSTITUTION USE

2348 1 0 3 2 0

Fo[illegible] 12-5-07
Stat[illegible] Michigan
Department of Community Health
MO[illegible] 1-1 12/06/2007
#1[illegible]

>0749099623 12/06/2007
003120808776

041203895
NATIONAL CITY ASHLAND
12/07/07 BK035

061729193
0410-0001-4
12072007
ENT=1268 TRC=1255 PK=[illegible]

*FEDERAL RESERVE BOARD OF GOVERNORS REG. CC

"Lisa Slenk"
<lslenk@ebw-electronics.com
>
06/12/2008 09:51 AM

To Estrella Calvo/R5/USEPA/US@EPA
cc
bcc

Subject Final Project Status Report

Hello!

Here is the Final Project Status Report you requested. If you need anything else let me know.

~ Lisa

EBW ELECTRONICS

Lisa Slenk
Accounting Supervisor
EBW Electronics, Inc.
13110 Ransom Street
Holland, MI 49424
616-786-0575 ext 30

The information contained in or disclosed by this document is considered proprietary by EBW Electronics, Inc. This document and the items and information contained or disclosed herein shall not be used, copied, or reproduced in whole or in part, nor shall the contents be revealed in any manner to any person unless written permission is obtained from EBW Electronics, Inc. If you have received this communication in error, please notify us immediately by e-mail or by telephone at (616) 786-0575.

20080612113954997.pdf

EBW ELECTRONICS

Design, engineering, and manufacturing of electronic products

April 16, 2008

Mr. David Star (DT-8J)
Pesticides and Toxics Compliance Section
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

Re: EPA Consent Agreement Docket No. EPCRA-05-2007-0036

Dear Mr. Star:

Please find attached the final Project Status Report per Paragraph 36 of the CAFO. Attached also find the Michigan Department of Community Health Cash Receipts Log and Deposit Transaction Detail report for the SEP funds as required.

If you have any questions, please feel free to contact us at 616-786-0575.

Sincerely,

J. Cory Steeby
President

13110 Ransom Street • Holland, Michigan 49424 • www.ebw-electronics.com
800 787 0575 toll-free • 616 786 0575 phone • 616 786 0513 fax

STATE OF MICHIGAN
DEPARTMENT OF COMMUNITY HEALTH
LANSING

JENNIFER M. GRANHOLM
GOVERNOR

JANET OLSZEWSKI
DIRECTOR

April 15, 2008

Mr. Cory Steeby, President
EBW Electronics, Inc.
13110 Ransom Street
Holland, MI. 49424

Regarding – Status and Completion of EPA Consent Agreement

Dear Mr. Steeby:

Please find attached the completion report for EPA Consent Agreement # EPCRA-05-2007-0036. This report should be forwarded to the EPA under separate cover. Please contact me if you have any questions or concerns.

Sincerely,

Steve M. Smith
Field Consultant, Healthy Homes Section MDCH

(616) 240-3926

CAPITOL VIEW BUILDING • 201 TOWNSEND STREET • LANSING, MICHIGAN 48913
www.michigan.gov • (517) 373-3740
Printed by members of:
SEIU

Consent Agreement Docket # EPCRA-05-2007-0036

Project Status Report per Paragraph 36 of the CAFO

4/15/08

PROJECT ADDRESS	STATUS OF PROJECT	AMOUNT DISBURSED	SUMMARY OF LEAD RELATED WORK	CONTRACTOR(S) STATE LEAD LICENSE #
39 W 19th, Holland	Completed 11/11/07	$2500 disbursed on 11/15/07	New vinyl replacement windows, fascia/trim encapsulation, 3 new entry doors.	A-1 Professional Construction (C-0048)
194 W 13th, Holland	Completed 1/24/08	$9009 disbursed on 1/24/08	Wood replacement windows, soil removal in rear yard, encapsulation of various interior surfaces	Abatement Specialties Group (C-0009)
TOTAL EXPENDED		**$11,509**		

These projects have now been completed. All funds both from the EPA Settlement and Lead and Healthy Homes Section, Michigan Department of Community Health were used entirely on the elimination of lead based paint hazards. Attached are copies of the Clearance Reports for both projects.

LEAD HAZARD CLEARANCE REPORT
VISUAL AND DUST WIPE RESULTS

Project Address – 194 W 13th, Holland 49423

Owner Name – Mr. And Mrs. Rico

Date of clearance (project completion) - 12/13/07

Start date of Project - 12/11/07

Contractor: Abatement Specialties
Contractor Address: 11180 East D Ave, Richland 49083

Contractor Phone #: (269) 629-5247

Risk Assessor – *Steve M Smith* P – 2309

Signature:

Address: Lead and Healthy Homes Section
Capitol View Building
201 Townsend Street
P.O. Box 30195
Lansing, MI. 48913

Date: 1/24/08

DUST WIPES

Sample Number	Room Location	Component (floor, sill, trough, etc)	Clearance category	Visual Pass or Fail	Pb Concentration in ug/sqft	Pass or fail
1	Room 6 - bedroom	Floor	1	P	BRL	P
2	Room 6 - bedroom	Sill	1	P	BRL	P
3	Room 7 - bedroom	Floor	1	P	BRL	P
4	Room 7 - bedroom	Trough	1	P	43 Ug/sqft	P
5	Kitchen	Floor	1	P	BRL	P
6	Kitchen	Trough	1	P	97 Ug/sqft	P
7	Room 2 – bedroom	Floor	1	P	BRL	P
8	Room 2 – bedroom	Sill	1	P	BRL	P
	Replacement soil	*Sample #1*				P
	Replacement soil	*Sample #2*				P
	Exterior - Visual	Side A	3	P		P
	Exterior - Visual	Side B	3	P		P
	Exterior - Visual	Side C	3	P		P
	Exterior - Visual	Side D	3	P		P

1 – interior, no containment 2 – interior with containment 3 – exterior treatment 4 – routine maintenance 5 – soil treatment BRL = Below Reporting Limit

NOTE – visual to be repeated in the Spring

Note: All dust wipe samples were analyzed by: ***State of Michigan Department of Community Health***
Trace Metals Laboratory
3335 Martin Luther King Jr. Blvd
Lansing, MI. 48909

Complies with R325.99407(8)

10/18/07

1.0 Introduction and Scope of Service

The purpose of this clearance examination was to confirm that lead-based paint hazards identified in the risk assessment were properly abated or controlled and that final cleaning was effective and that no lead-based paint hazards remain. As outlined in Federal and State of Michigan regulations, this consists of the following two parts:

1) Visual examination for presence of deteriorated lead-based paint, paint chips, dust and debris

2) Environmental sampling of interior floor and window sill/trough dust and bare soil according to guidelines set forth by HUD which vary with the amount and location of hazard correction conducted.

2.0 Procedure

2.1 VISUAL INSPECTION

Visual inspection was conducted according to procedures set forth by HUD and the State of Michigan, and was conducted to confirm that lead-based paint hazards identified in the lead-based paint risk assessment were corrected, and that visible amounts of paint chips, dust and debris are not present. Focus of the visual inspection was to renovation areas and to those areas previously identified as having a lead-based paint hazard.

2.2 DUST WIPE SAMPLING

Dust wipe samples were collected according to the HUD Guidelines and State of Michigan regulations. Minimum sampling collection requirements are as follows:

(i) Projects with containment between work and non-work areas: the clearance professional shall take 1 dust sample from 1 window, if available, and 1 dust sample from the floor of not less than 4 rooms, hallways, or stairwells within the containment area. Dust samples from windows shall be collected by alternating the sill and trough in each room, to the extent possible. In addition, the clearance professional shall take 1 dust sample from the floor outside the containment area. If there are less than 4 rooms, hallways, or stairwells within the containment area, then the clearance professional shall sample all rooms, hallways, or stairwells.

(ii) Projects with no containment: the clearance professional shall take 1 dust sample from 1 window, if available, and 1 dust sample from the floor of not less than 4 rooms, hallways, or stairwells in the residential dwelling or child occupied facility. Dust samples from windows shall be collected by alternating the sill and trough in each room, to the extent possible. If there are less than 4 rooms, hallways, or stairwells within the residential dwelling or child occupied facility, then the clearance professional shall sample all rooms, hallways, or stairwells.

(iii) Dust collection is not required for projects involving exterior areas only, but may be conducted at the discretion of the clearance professional to insure that tracking and air borne contamination has not occurred.

Wipe sampling was conducted according to the following procedure:

- An area located on the surface to be sampled was measured and marked
- A single approved sampling wipe (disposable towelette) was opened with a gloved hand and wiped across the sampling area in a series of "S" patters. *Composite dust wipe samples are prohibited in Michigan.*
- The wipe was then placed into a container labeled with the site location identification and sample location.
- Samples were analyzed by Corrosion Control Consultants and Labs. The results are reported in micrograms per square foot (ug/sqft).

2.3 SOIL SAMPLING

Soil sampling is not mandatory, but may be conducted at the discretion of the clearance professional during a clearance examination to determine that soil did not become contaminated during the project.

2.4 LABORATORY

Dust and/or soil samples were analyzed by Corrosion Control Consultants and Labs located at 4403 Donkers Court, Kentwood, MI 49512 (616-940-3112). Corrosion Control Consultants and Labs is recognized by the U.S. Environmental Protection Agency (EPA) as having met NLLAP laboratory performance requirements and having demonstrated they can accurately analyze for lead in paint chips, dust, and/or soil samples associated with the abatement and control of lead based paint.

Success Enterprise
&
Environmental Services
2808 S. Mill Iron Rd. Muskegon, MI 49444
(231) 777-3538 or (231) 773-6164
Fax: (231) 773-5586
E-Mail: LauraSuccess@aol.com

LEAD BASED PAINT CLEARANCE REPORT

LOCATION OF PROJECT:
39 W. 19th St.
Holland, MI 49423
616-393-5608

PREPARED FOR:
Ottawa County Community Action Agency
12251 James St. Suite 300
Holland, MI 49424
616-393-5608

Report Prepared:
June 19, 2007

Inspection Report By:
Laura K. Paddock
Certified Lead Inspector/Risk Assessor P-2647

Date of Inspections:
June 14, 2007

TABLE OF CONTENTS

1.0	INTRODUCTION AND SCOPE OF SERVICE	1
2.0	PROCEDURES	1
2.1	VISUAL INSPECTION	1
2.2	DUST WIPE SAMPLING	1
2.3	SOIL SAMPLING	2
2.4	LABORATORY	2
3.0	DESCRIPTION OF LEAD-BASED PAINT TREATMENT	3
4.0	RESULTS AND CONCLUSIONS	3
4.1	VISUAL INSPECTION RESULTS	3
4.2	DUST WIPE RESULTS	3
4.3	CONCLUSION	3
5.0	RECOMMENDATIONS FOR ONGOING MONITORING	4
6.0	FLOOR PLANS	5
7.0	SITE MAP	7
8.0	CERTIFICATION	9

3.0 Description of Lead-Based Paint Treatment

Room	Description of Work
Whole House	Remove and replace all operable wood windows with new vinyl replacement windows.
Room 5	Remove and replace side D door with new metal-clad door.
Room 6	Remove and replace side C door with new metal-clad door.
Room 9	Install guardrail on exterior of house. Encapsulate door, jamb, and stop.
All Rooms	Clean

4.0 Results and Conclusions

4.1 VISUAL INSPECTION RESULTS

A visual inspection of the property was done inside and out. A thorough cleaning had been done and all materials had been removed from the property.

4.2 DUST WIPE RESULTS

Sample Number	Room / Location	Component	Area Wiped in sq/ft	Pb Concentration in ug/sqft
1	Room 2, side D	Floor	1sq/ft	5.5ug/sqft
2	Room 2, side D	Sill	.48sq/ft	ND
3	Room 4, side B	Floor	1sq/ft	ND
4	Room 4, side C	Trough	.59sq/ft	13ug/sqft
5	Room 10, side A	Floor	1sq/ft	ND
6	Room 10, side A	Sill	.48sq/ft	ND
7	Room 12, side C	Floor	1sq/ft	ND
8	Room 12, side C	Trough	.42sq/ft	ND
9	Blank			ND

HUD reporting limits – floors, 40ug/sqft; window sills, 250ug/sqft; window troughs, 400ug/sqft

4.3 CONCLUSION

The interior of the home has passed the dust wipe clearance requirements as well as the interior and exterior visual inspections. The home has been cleaned sufficiently and meets State guidelines as of June 15, 2007, but is not valid on any paint disturbance or renovation work done after this date.

5.0 Recommendations for Ongoing Monitoring

ONGOING MONITORING (Re-evaluation and Owner Visual Survey)

Re-evaluation

A re-evaluation is a follow-up limited risk assessment conducted to determine the effectiveness of implemented hazard controls and whether or not new hazards have developed. The recommended period in which to conduct a re-evaluation is determined by HUD's Standard Re-evaluation Schedule and varies according to the hazard evaluation results and the actions (abatement / interim controls) that are taken to reduce such hazards. Re-evaluations are conducted by lead risk assessors and are implemented in order to discover:

- The presence of leaded dust above applicable standards
- Newly deteriorated lead-based paint
- Deteriorated or failed interim controls, encapsulants or enclosure treatments
- New bare soil with lead levels above applicable standards

HUD RECOMMENDED RE-EVALUATION SCHEDULE

Action Taken	Re-evaluation Frequency
Window replacement not conducted. Interim controls or mixture of interim control and abatement.	Annually for 2 years.
Window replacement conducted. Interim controls or mixture of interim controls and abatement.	1 year
Abatement of all lead-based paint hazards.	4 years
Abatement of all lead-based paint.	None

Owner Visual Survey

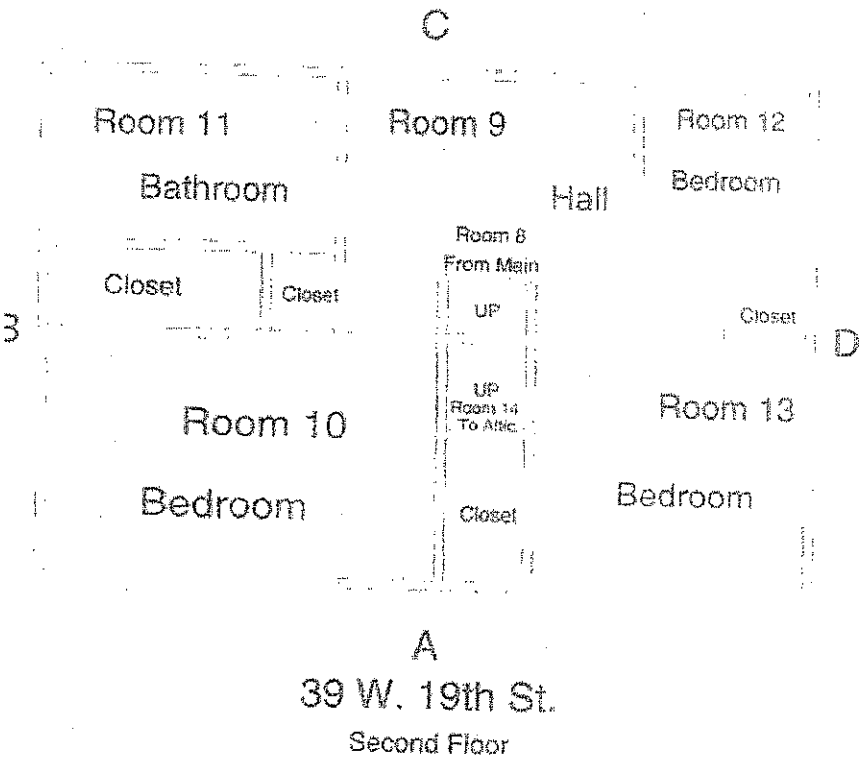
An Owner Visual Survey should be conducted annually and is performed by an owner or owner's representative implemented in order to discover:

- New deterioration on known or suspected lead based paint surfaces.
- Deteriorated pr failed interim controls, encapsulants or enclosure treatments.
- Structural problems which may threaten the integrity of any known or suspected lead-based paint.

If any hazards are eliminated with the use of encapsulants, check for signs of deterioration or detachment from the surface about one month after application, again after 6 months and annually thereafter. For enclosures, monitor annually. If interim controls were used on a soil lead hazard, check new ground cover after three months and then annually thereafter.

6.0 FLOOR PLANS

C
Room 7
Bedroom
Room 5
Bath
Side Door
UP
UP
Back Door
Closet
Room 4
Room 6
Hall
Room 1a From Base
UP
3
Kitchen
Room 2
D
Room 1
Room 2
To 2nd
Room 3
Living Room
UP
Foyer and Hall
Dining Room
Front Door
A
39 W. 19th St.
Main Floor


C
Room 11
Room 9
Room 12
Bathroom
Hall
Bedroom
Room 8 From Main
Closet
Closet
UP
Closet
3
D
UP Room 14 To Attic
Room 10
Room 13
Bedroom
Closet
Bedroom
A
39 W. 19th St.
Second Floor

7.0 SITE MAP

MAPQUEST

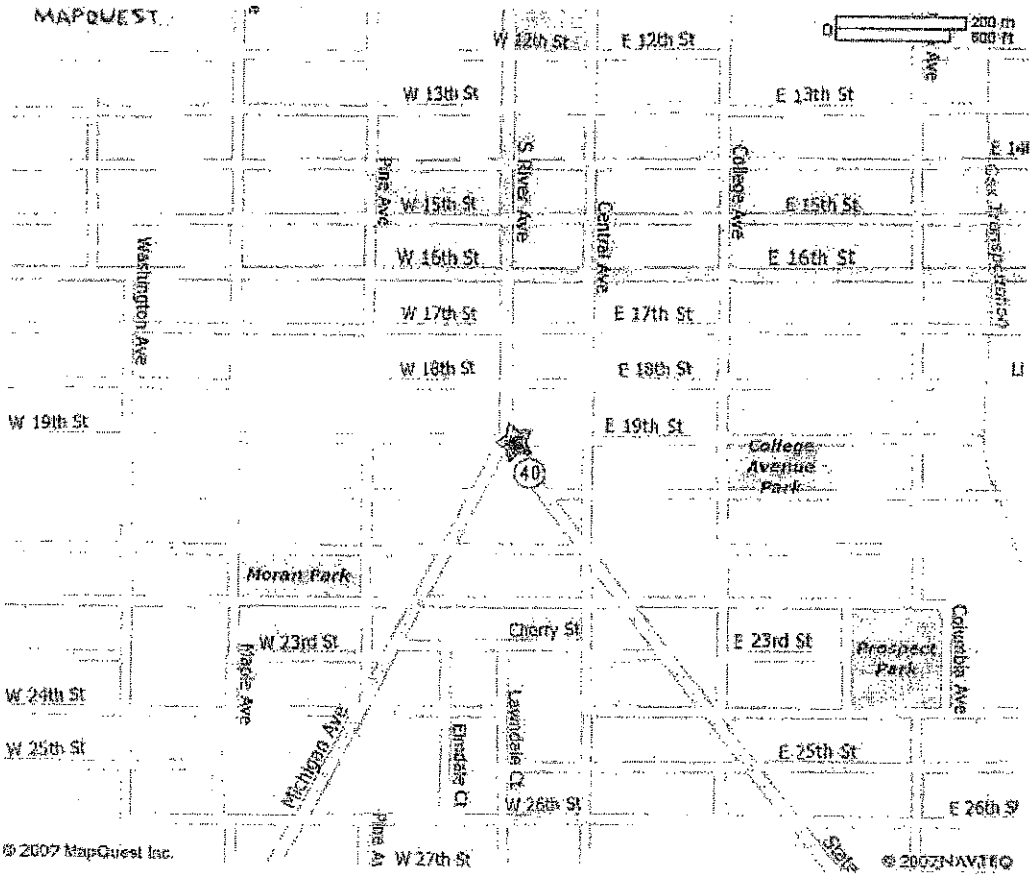
39 W 19th St
Holland MI
49423-4129 US

Notes:

LIMITED TIME WEEKLY AND WEEKEND DEALS

COMPACT	MIDSIZE	FULL SIZE
$28.99 Wknd Day	$31.99 Wknd Day	$34.99 Wknd Day
$149.99 Per Week	$219.99 Per Week	$229.99 Per Week
PREMIUM	MINIVAN	STD. SUV
$36.99 Wknd Day	$42.99 Wknd Day	$42.99 Wknd Day
$239.99 Per Week	$259.99 Per Week	$259.99 Per Week

Budget
Get These Deals



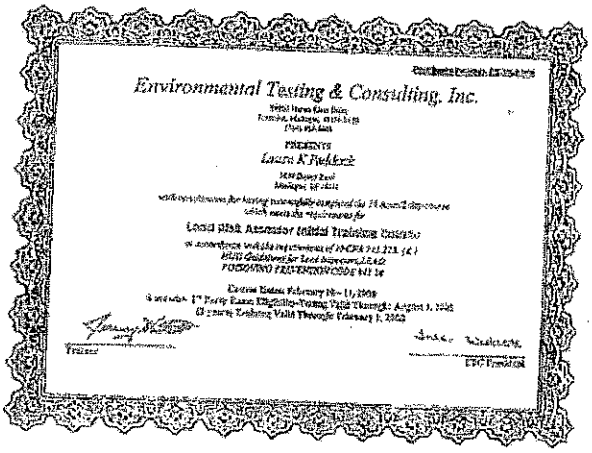
All rights reserved. Use Subject to License/Copyright

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

6.0 Certification

This clearance examination was done in accordance with all Federal and State of Michigan lead-based paint regulations by the following the State of Michigan certified Lead Inspector / Risk Assessor:

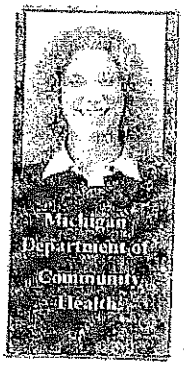
Laura K. Paddock
MI Certified Lead Inspector/Risk Assessor P-2647


Environmental Testing & Consulting, Inc.

PRESENTS

Laura K Paddock

Lead Risk Assessor Initial Training Course



This is to certify that

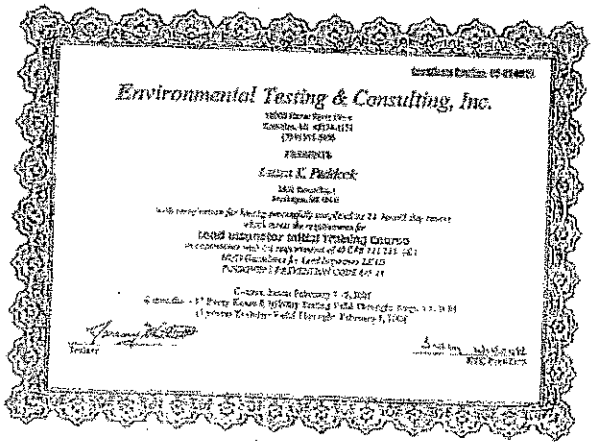
Laura Paddock

has satisfactorily met the statutory requirements for the lead discipline of

Inspector/Risk Assessor

MI Cert.No. P-2647

Annual cert. fee due by March 31, 2005


Environmental Testing & Consulting, Inc.

PRESENTS

Laura K. Paddock

Lead Inspector Initial Training Course

NITON LLC

Certificate of Achievement

Laura Paddock
Success Enterprise Ltd.

EBW ELECTRONICS

Design, engineering, and manufacturing of electronic products

January 15, 2008

Mr. David Star (DT-8J)
Pesticides and Toxics Compliance Section
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

Re: EPA Consent Agreement Docket No. EPCRA-05-2007-0036

Dear Mr. Star:

Please find attached the Project Status Report per Paragraph 36 of the CAFO. Attached also find the Michigan Department of Community Health Cash Receipts Log and Deposit Transaction Detail report for the SEP funds as required.

If you have any questions, please feel free to contact us at 616-786-0575.

Sincerely,

J. Cory Steeby
President

13110 Ransom Street • Holland, Michigan 49424 • www.ebw-electronics.com
800 787 0575 toll-free • 616 786 0575 phone • 616 786 0513 fax

Consent Agreement Docket # EPCRA-05-2007-0036

Project Status Report per Paragraph 36 of the CAFO

1/4/07

PROJECT ADDRESS	*STATUS OF PROJECT*	*AMOUNT DISBURSED*	*SUMMARY OF LEAD RELATED WORK*	*CONTRACTOR(S) STATE LEAD LICENSE #*
39 W 19th, Holland	Completed 11/11/07	$2500 disbursed on 11/15/07	New vinyl replacement windows, fascia/trim encapsulation, 3 new entry doors	A-1 Professional Construction (C-0048)
194 W 13th, Holland	90% complete	$0 ($9009 to be disbursed upon completion)	Wood replacement windows, soil in rear yard, encapsulation of various interior surfaces	Abatement Specialties Group (C-0009)
TOTAL EXPENDED TO DATE		**$2500**		

PROJECT NARRATIVE SUMMARY

39 W 19th, Holland – This project originated with the Ottawa County Community Action Agency. At their request additional funding through this settlement was provided so that the project could continue. Without these funds this project would have failed as total project costs including lead costs exceeded their program limits.

The beneficiary of these funds is a HUD defined moderate income family of four. The family composition includes a husband and wife with two children ages 1 and 2 at the time of application. The oldest child had a blood lead test and tested positive for lead. The youngest child was not tested. Numerous lead based paint hazards were identified per a Lead Based Paint Risk Assessment performed on April 23, 2007 by Success Enterprise and Environmental Services. Lead based paint hazards were remediated at a cost of $5100. A Clearance Report was conducted on June 19, 2007 a copy of which is attached.

194 W 13th, Holland – This project was referred to the Department of Community Health, Lead and Healthy Homes Section by the Ottawa County Health Department. The referral was based on a high Elevated Blood Lead Level of a resident child under the age of 6. The total cost of this project is $15,650.

All funds are devoted to the elimination of lead paint hazards. Nine thousand and nine dollars will be expended from this EPA settlement combined with $6,641 from the Lead and Healthy Homes Section.

The beneficiary of these funds is a HUD defined low income family of 8. A Lead Based Paint Risk Assessment was performed on June 13, 2007 by Steve M. Smith from the Lead and Healthy Homes Section. Numerous lead based paint hazards were identified in the Risk Assessment report. Unique to this project is the fact that soil contamination due to lead was very high in the vegetable garden area cultivated by the owners. Lead from the soil and the windows are the two most probable sources of contamination at this home. All work has been completed on this project except minor exterior painting to be completed when weather permits. Further completion reports regarding this project will be forthcoming.

Success Enterprise
&
Environmental Services

2808 S. Mill Iron Rd. Muskegon, MI 49444
(231) 777-3538 or (231) 773-6164
Fax: (231) 773-5586
E-Mail: LauraSuccess@aol.com

LEAD BASED PAINT CLEARANCE REPORT

LOCATION OF PROJECT:
39 W. 19th St.
Holland, MI 49423
616-393-5608

PREPARED FOR:
Ottawa County Community Action Agency
12251 James St. Suite 300
Holland, MI 49424
616-393-5608

Report Prepared:
June 19, 2007

Inspection Report By:
Laura K. Paddock
Certified Lead Inspector/Risk Assessor P-2647

Date of Inspections:
June 14, 2007

TABLE OF CONTENTS

1.0	INTRODUCTION AND SCOPE OF SERVICE	1
2.0	PROCEDURES	1
2.1	VISUAL INSPECTION	1
2.2	DUST WIPE SAMPLING	1
2.3	SOIL SAMPLING	2
2.4	LABORATORY	2
3.0	DESCRIPTION OF LEAD-BASED PAINT TREATMENT	3
4.0	RESULTS AND CONCLUSIONS	3
4.1	VISUAL INSPECTION RESULTS	3
4.2	DUST WIPE RESULTS	3
4.3	CONCLUSION	3
5.0	RECOMMENDATIONS FOR ONGOING MONITORING	4
6.0	FLOOR PLANS	5
7.0	SITE MAP	7
8.0	CERTIFICATION	9

1.0 Introduction and Scope of Service

The purpose of this clearance examination was to confirm that lead-based paint hazards identified in the risk assessment were properly abated or controlled and that final cleaning was effective and that no lead-based paint hazards remain. As outlined in Federal and State of Michigan regulations, this consists of the following two parts:

1) Visual examination for presence of deteriorated lead-based paint, paint chips, dust and debris

2) Environmental sampling of interior floor and window sill/trough dust and bare soil according to guidelines set forth by HUD which vary with the amount and location of hazard correction conducted.

2.0 Procedure

2.1 VISUAL INSPECTION

Visual inspection was conducted according to procedures set forth by HUD and the State of Michigan, and was conducted to confirm that lead-based paint hazards identified in the lead-based paint risk assessment were corrected, and that visible amounts of paint chips, dust and debris are not present. Focus of the visual inspection was to renovation areas and to those areas previously identified as having a lead-based paint hazard.

2.2 DUST WIPE SAMPLING

Dust wipe samples were collected according to the HUD Guidelines and State of Michigan regulations. Minimum sampling collection requirements are as follows:

(i) Projects with containment between work and non-work areas: the clearance professional shall take 1 dust sample from 1 window, if available, and 1 dust sample from the floor of not less than 4 rooms, hallways, or stairwells within the containment area. Dust samples from windows shall be collected by alternating the sill and trough in each room, to the extent possible. In addition, the clearance professional shall take 1 dust sample from the floor outside the containment area. If there are less than 4 rooms, hallways, or stairwells within the containment area, then the clearance professional shall sample all rooms, hallways, or stairwells.

(ii) Projects with no containment: the clearance professional shall take 1 dust sample from 1 window, if available, and 1 dust sample from the floor of not less than 4 rooms, hallways, or stairwells in the residential dwelling or child occupied facility. Dust samples from windows shall be collected by alternating the sill and trough in each room, to the extent possible. If there are less than 4 rooms, hallways, or stairwells within the residential dwelling or child occupied facility, then the clearance professional shall sample all rooms, hallways, or stairwells.

(iii) Dust collection is not required for projects involving exterior areas only, but may be conducted at the discretion of the clearance professional to insure that tracking and air borne contamination has not occurred.

Wipe sampling was conducted according to the following procedure:

- An area located on the surface to be sampled was measured and marked
- A single approved sampling wipe (disposable towelette) was opened with a gloved hand and wiped across the sampling area in a series of "S" patters. *Composite dust wipe samples are prohibited in Michigan.*
- The wipe was then placed into a container labeled with the site location identification and sample location.
- Samples were analyzed by Corrosion Control Consultants and Labs. The results are reported in micrograms per square foot (ug/sqft).

2.3 SOIL SAMPLING

Soil sampling is not mandatory, but may be conducted at the discretion of the clearance professional during a clearance examination to determine that soil did not become contaminated during the project.

2.4 LABORATORY

Dust and/or soil samples were analyzed by Corrosion Control Consultants and Labs located at 4403 Donkers Court, Kentwood, MI 49512 (616-940-3112). Corrosion Control Consultants and Labs is recognized by the U.S. Environmental Protection Agency (EPA) as having met NLLAP laboratory performance requirements and having demonstrated they can accurately analyze for lead in paint chips, dust, and/or soil samples associated with the abatement and control of lead based paint.

3.0 Description of Lead-Based Paint Treatment

Room	Description of Work
Whole House	Remove and replace all operable wood windows with new vinyl replacement windows.
Room 5	Remove and replace side D door with new metal-clad door.
Room 6	Remove and replace side C door with new metal-clad door.
Room 9	Install guardrail on exterior of house. Encapsulate door, jamb, and stop.
All Rooms	Clean

4.0 Results and Conclusions

4.1 VISUAL INSPECTION RESULTS

A visual inspection of the property was done inside and out. A thorough cleaning had been done and all materials had been removed from the property.

4.2 DUST WIPE RESULTS

Sample Number	Room / Location	Component	Area Wiped in sq/ft	Pb Concentration in ug/sqft
1	Room 2, side D	Floor	1sq/ft	5.5ug/sqft
2	Room 2, side D	Sill	.48sq/ft	ND
3	Room 4, side B	Floor	1sq/ft	ND
4	Room 4, side C	Trough	.59sq/ft	13ug/sqft
5	Room 10, side A	Floor	1sq/ft	ND
6	Room 10, side A	Sill	.48sq/ft	ND
7	Room 12, side C	Floor	1sq/ft	ND
8	Room 12, side C	Trough	.42sq/ft	ND
9	Blank			ND

HUD reporting limits – floors, 40ug/sqft; window sills, 250ug/sqft; window troughs, 400ug/sqft

4.3 CONCLUSION

The interior of the home has passed the dust wipe clearance requirements as well as the interior and exterior visual inspections. The home has been cleaned sufficiently and meets State guidelines as of June 15, 2007, but is not valid on any paint disturbance or renovation work done after this date.

5.0 Recommendations for Ongoing Monitoring

ONGOING MONITORING (Re-evaluation and Owner Visual Survey)

Re-evaluation

A re-evaluation is a follow-up limited risk assessment conducted to determine the effectiveness of implemented hazard controls and whether or not new hazards have developed. The recommended period in which to conduct a re-evaluation is determined by HUD's Standard Re-evaluation Schedule and varies according to the hazard evaluation results and the actions (abatement / interim controls) that are taken to reduce such hazards. Re-evaluations are conducted by lead risk assessors and are implemented in order to discover:

- The presence of leaded dust above applicable standards
- Newly deteriorated lead-based paint
- Deteriorated or failed interim controls, encapsulants or enclosure treatments
- New bare soil with lead levels above applicable standards

HUD RECOMMENDED RE-EVALUATION SCHEDULE

Action Taken	Re-evaluation Frequency
Window replacement not conducted. Interim controls or mixture of interim control and abatement.	Annually for 2 years.
Window replacement conducted. Interim controls or mixture of interim controls and abatement.	1 year
Abatement of all lead-based paint hazards.	4 years
Abatement of all lead-based paint.	None

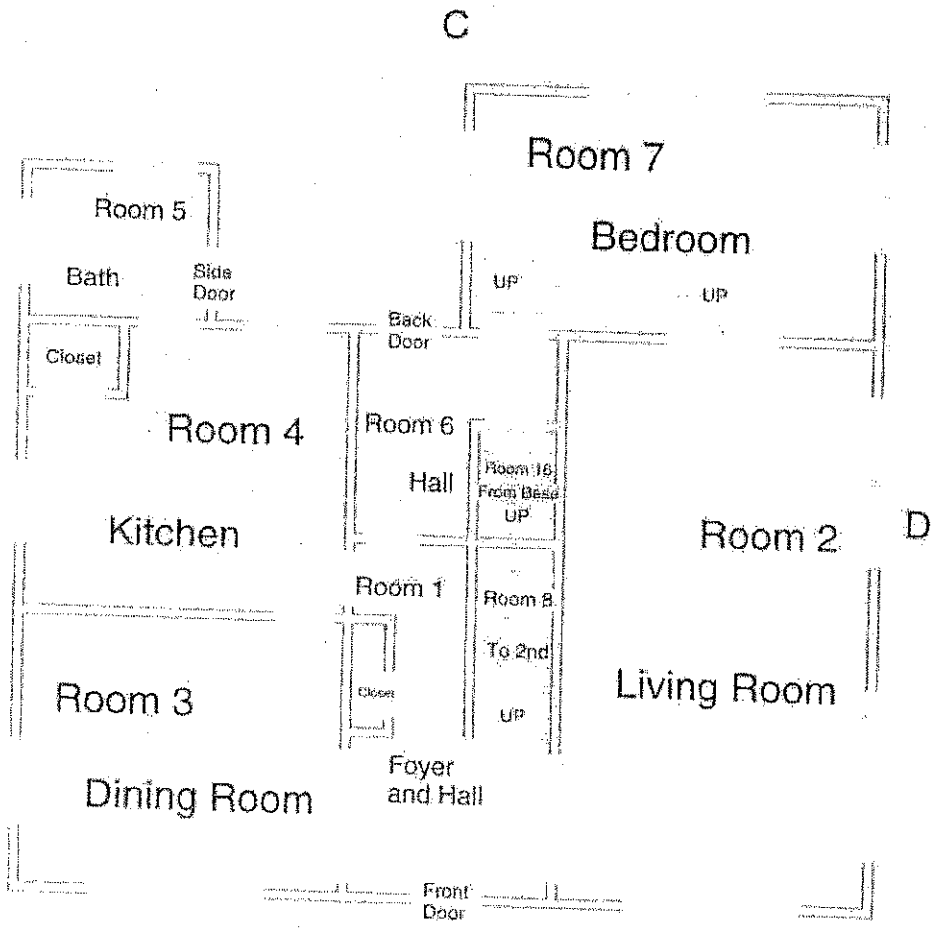
Owner Visual Survey

An Owner Visual Survey should be conducted annually and is performed by an owner or owner's representative implemented in order to discover:

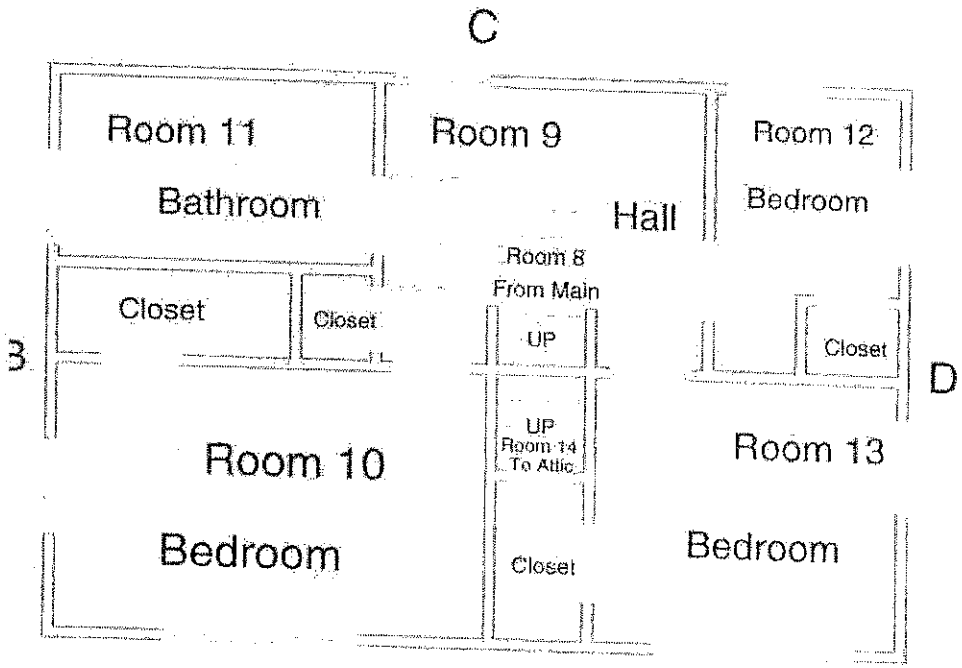
- New deterioration on known or suspected lead based paint surfaces.
- Deteriorated pr failed interim controls, encapsulants or enclosure treatments.
- Structural problems which may threaten the integrity of any known or suspected lead-based paint.

If any hazards are eliminated with the use of encapsulants, check for signs of deterioration or detachment from the surface about one month after application, again after 6 months and annually thereafter. For enclosures, monitor annually. If interim controls were used on a soil lead hazard, check new ground cover after three months and then annually thereafter.

6.0 FLOOR PLANS



A
39 W. 19th St.
Main Floor



A
39 W. 19th St.
Second Floor

7.0 SITE MAP

MAPQUEST

39 W 19th St
Holland MI
49423-4129 US

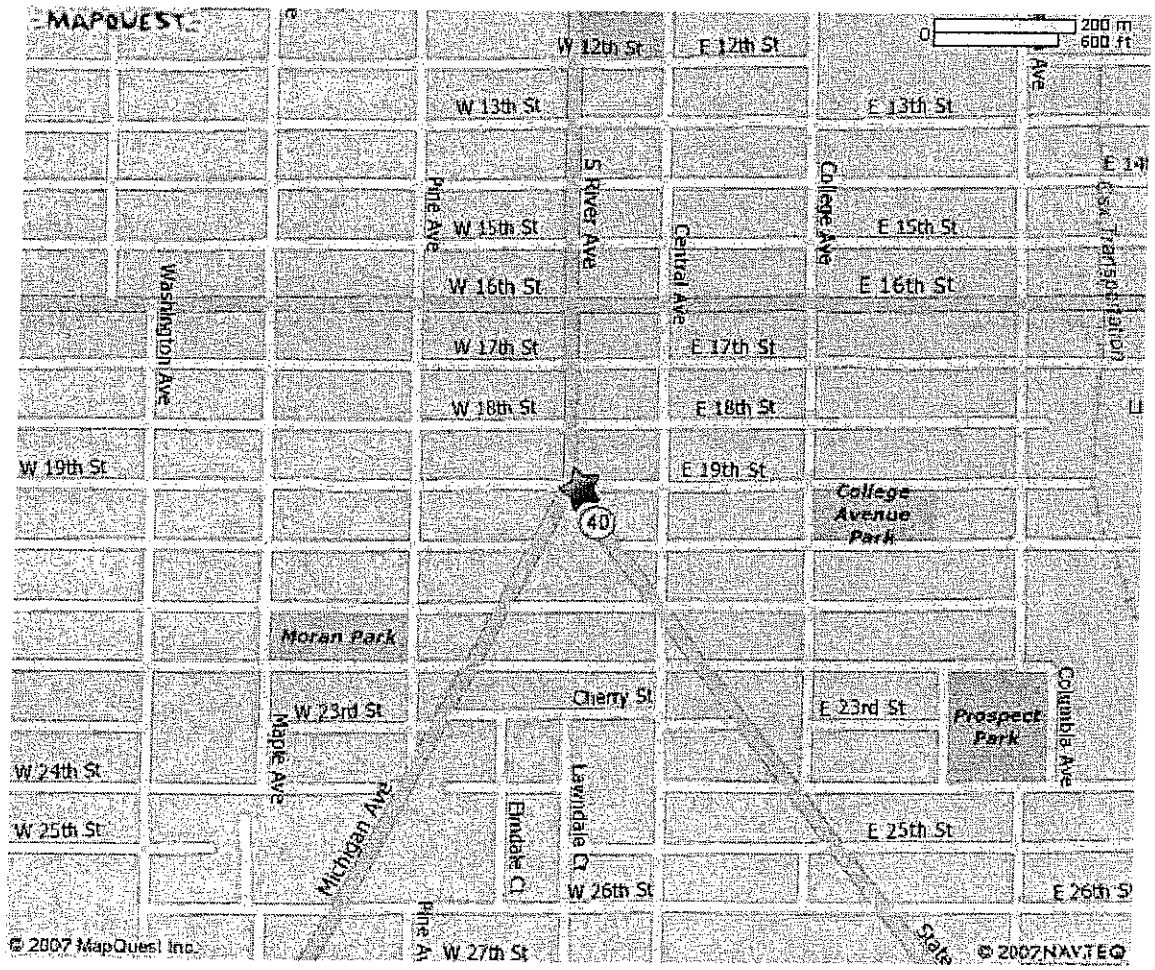
Notes:

LIMITED TIME WEEKLY AND WEEKEND DEALS

COMPACT	MIDSIZE	FULL SIZE
$28.99 Wknd Day	$31.99 Wknd Day	$34.99 Wknd Day
$149.99 Per Week	$219.99 Per Week	$229.99 Per Week
PREMIUM	MIN VAN	STD. SUV
$36.99 Wknd Day	$42.99 Wknd Day	$42.99 Wknd Day
$239.99 Per Week	$259.99 Per Week	$259.99 Per Week

Budget

Get These Deals



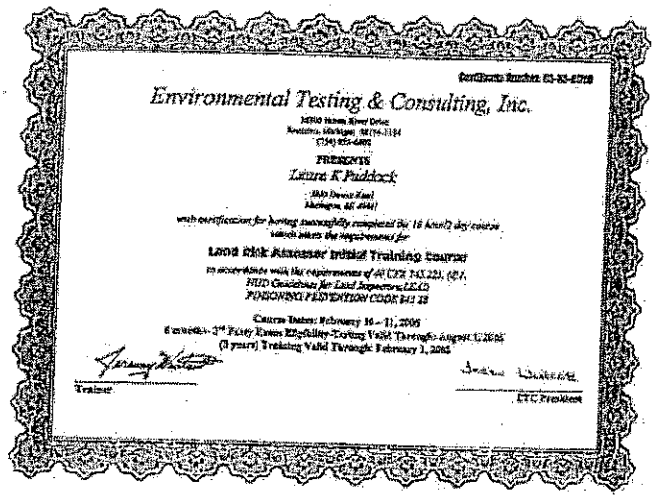
All rights reserved. Use Subject to License/Copyright

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

8.0 Certification

This clearance examination was done in accordance with all Federal and State of Michigan lead-based paint regulations by the following the State of Michigan certified Lead Inspector / Risk Assessor:

Laura K. Paddock
MI Certified Lead Inspector/Risk Assessor P-2647


Environmental Testing & Consulting, Inc.
PRESENTS
Laura K Paddock
Lead Risk Assessor Initial Training Course
Trainer
ETC President

This is to certify that

Laura Paddock

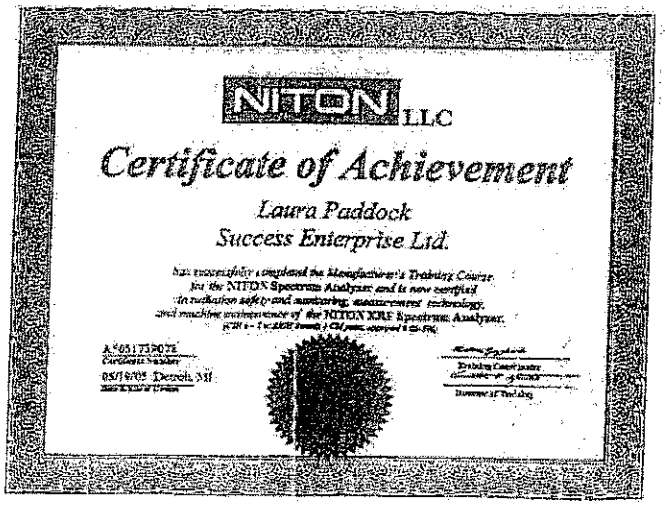
has satisfactorily met the statutory requirements for the lead discipline of

Inspector/Risk Assessor

MI Cert.No. P-2647

Annual cert. fee due by March 31, 2006

Environmental Testing & Consulting, Inc.
PRESENTS
Laura K. Paddock
Lead Inspector Initial Training Course
Trainer
ETC President


NITON LLC
Certificate of Achievement
Laura Paddock
Success Enterprise Ltd.
05/19/05 Detroit, MI

MICHIGAN DEPEARTMENT OF COMMUNITY HEALTH

CASH RECEIPTS LOG

Page #_1_____

BUREAU/CENTER/OFFICE/HOSPITAL		NAME		PHONE #	DATE
COMMUNITY HEALTH - HEALTHY HOMES SECTION		Jay Wagar		335-9390	12/5/2007
REMITTER	REFERENCE CHECK #/CASH	AMOUNT RECEIVED	AMOUNT RETURNED	REMARKS/CODING	
EBW Electronics (# EPCRA-05-2007-0036)	38193	$11,509.00	$0.00	Violation Fee Index 70090 PCA 84361 Object 9806	
SUBTOTAL		$11,509.00	$0.00		
NET AMOUNT TO ACCOUNTING		$11,509.00			

Opened By: Sonya Cedano

Checked By: [signature]

Received By:

Enclosed is supporting documentation regarding a deposit(s) made to your program. Please review account coding for accuracy and notify the Revenue Operations Section of any required changes or corrections.

MICHIGAN DEPARTMENT OF COMMUNITY HEALTH

DEPOSIT TRANSACTION DETAIL

2.100

Index: 70090	PCA: 84361	Object: 9606	Project:	Project Phase:	Grant:	Grant Phase:

Transaction Type NEW YEAR

Operator ID LANGHAM **Batch Number** 124919 **Batch Total** $11,509.00 **Location** 0001

Control Number	Receipt Date	Process Date	FY	Receipt Amount	Trans Type	Creator Id	Update Id	Status
1406141	12/6/2007	12/6/2007	2008	$11,509.00	01	LANGHAMJ	LANGHAMJ	P

Entry #	Remit Name	Reference	Remit Type	Remit Amount	Check Number	Status
1	EBW ELECTRONICS	HEALTHY HOMES	02	$11,509.00	38193	P

E#	Index	PCA	Obj	Project	Ph	Grant	Ph	GL	Amount	TC	AY	Invoice#	Deposit#	Suff	DepDate	RT	RefDoc#	Suff	Hot Key	Status
1	70090	84361	9606						$11,509.00	190	2008		28307258	007	12/6/2007	02				P

Comments:

Post Mark: **Case Number:** **Vendor Number:** **Mail Code:**

EBW ELECTRONICS

Design, engineering, and manufacturing of electronic products

December 10, 2007

Ms Estrella Calvo, LC-8J
US EPA
Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3590

Dear Ms Calvo,

The reason for EBWE's delinquency on funding the CAFO was that the Consent Agreement did not include information as to where the funds should be sent. Per discussions with other EPA agents EBWE was awaiting this information from the EPA. Per your letter dated November 29, 2007 EBWE has sent the funds via check to a PO box at the Michigan Department of Community Health.

Kind Regards,

J. Cory Steeby
President

cc: LC

13110 Ransom Street • Holland, Michigan 49424 • www.ebw-electronics.com
800 787 0575 toll-free • 616 786 0575 phone • 616 786 0513 fax

EBW ELECTRONIC

13110 Ransom Street
Holland, Michigan 49424

CERTIFIED MAIL™

7006 2150 0003 3232 3595

HOLLAND MI DEC 14 '07

$5.21

PB METER 8315165

U.S. POSTAGE

RECEIVED
DEC 18 2007
U.S. EPA - REGION 5

MS ESTRELLA CALVO, LC-8J
US EPA REGION 5
77 W JACKSON BLVD
CHICAGO IL 60604-3590

60604+3511

UNITED STATES POSTAL SERVICE

Home | Help

Track & Confirm

Track & Confirm

Search Results

Label/Receipt Number: **7001 0320 0005 8918 0703**
Status: **Delivered**

Your item was delivered at 4:10 PM on December 3, 2007 in HOLLAND, MI 49424.

Track & Confirm

Enter Label/Receipt Number.

Notification Options

Track & Confirm by email

Get current event information or updates for your item sent to you or others by email. Go >

Site Map | Contact Us | Forms | Gov't Services | Jobs | Privacy Policy | Terms of Use | National & Premier Accounts

Copyright© 1999-2007 USPS. All Rights Reserved. No FEAR Act EEO Data FOIA

7001 0320 0005 8918 0703

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

ESTRELLA CALVO (LC-FJ)

Postage	$ 114
Certified Fee	265
Return Receipt Fee (Endorsement Required)	215
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$ 594

Postmark Here

USPS 60604-9998 LOOP STATION

Sent To EBW ELECTRONICS INC.
CORY STEFBY, PRESIDENT
Street, Apt. No.; or PO Box No. 13110 RANSOM STREET
City, State, ZIP+4 HOLLAND, MICHIGAN 49424

PS Form 3800, January 2001 — See Reverse for Instructions

IS SECTION

3. Also complete
ry is desired.
ess on the reverse
card to you.
ck of the mailpiece,
rmits.

S, INC.
PRESIDENT
STREET
IGAN 49424

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)* Lisa Stenk
B. Date of Delivery 12-3
C. Signature X Lisa Stenk ☐ Agent ☐ Addressee
D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☑ Certified Mail ☐ Express Mail
☐ Registered ☑ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. Article Number *(Transfer from service label)* 7001 0320 0005 8918 0703

PS Form 3811, March 2001 Domestic Return Receipt 102595-01-M-1424

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

NOV 29 2007

REPLY TO THE ATTENTION OF:
LC-8J

CERTIFIED MAIL
Receipt No. 7001 0320 0005 8918 0703

Cory Steeby, President
EBW Electronics, Inc.
13110 Ransom Street
Holland, Michigan 49424

Re: Consent Agreement and Final Order, Docket No. EPCRA-05-2007-0036

Dear Mr. Steeby:

Per our telephone conversation on Tuesday, November 28, 2007, I would like to provide you with the payment information for Supplemental Environmental Project (SEP) funds of the above matter. Please make your payment of $11,509 payable to the State of Michigan and send it to:

Michigan Department of Community Health
Healthy Homes Section
Attention: Wesley F. Priem
P.O. Box 30195
Lansing, Michigan 48909

The Consent Agreement and Final Order (CAFO) which you signed requires that within 30 days of receipt of the fully executed CAFO the selected projects be funded. That effective date was September 27, 2007, which means funding of the selected projects is overdue. Accordingly, pursuant to paragraph 40.a. of the CAFO stipulated penalties may apply. We would like to provide you with the opportunity to explain the occurrence of any events which have caused or may have caused delays in the funding of the SEP. Please describe in detail the precise cause or causes of the delay, the measures taken and to be taken by you to prevent or minimize the delay, the anticipated length of the delay, and the timetable by which those measures will be implemented. Please address your response to Estrella Calvo (LC-8J), U.S. EPA, Region 5, 77 West Jackson Blvd., Chicago, Illinois 60604, within ten business days of receipt of this notice.

We would also like to direct your attention to paragraph 36 of the CAFO, which requires you to provide a Status Report to U.S. EPA every 90 days from the effective date of the CAFO until the SEP is complete and the SEP Completion Report has been submitted. Please be advised that the contact for procuring the necessary information for the SEP Completion Report is Wesley F. Priem

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on 100% Recycled Paper (50% Postconsumer)

of the Michigan Department of Community Health. Mr. Priem is the Section Manager and can be contacted by telephone at (517) 335-9390.

If you have questions, please contact Estrella Calvo, of my staff at (312) 353-8931.

Sincerely,

Anthony L. Restaino

Anthony L. Restaino
Pesticides and Toxics Compliance Section

Enclosure

Waste, Pesticides and Toxics Division

Type of Document: Follow-up Letter

Name of Document (Facility Name & Location): EBW Electronics, Inc., Holland, Michigan

---

Receipt # 7001 0320 0005 8918 0703 **Originator/Phone:** Estrella Calvo 3-8931

NOTE: Originator and first level supervisor are responsible for assuring that documents are in plain language. All other reviewers should consider plain language in their reviews. See the plain language checklist on the reverse side of this sheet.

Date	Name	Initials
11/27/2007	**Author: Estrella Calvo**	EC 11/28/07
11/29/07	**Anthony L. Restaino, Chief** **Wastes Pesticides and Toxics Enforcement Section**	ALR

Return to Estrella Calvo **Correction Required**
(attach official file copy/return w/originator's copy)

REMARKS/COMMENTS:

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

SEP 2 7 2007

REPLY TO THE ATTENTION OF:
LC-8J

CERTIFIED MAIL
Receipt No. 7001 0320 0006 0185 8344

Cory Steeby, President
EBW Electronics, Inc
13110 Ransom Street
Holland, MI 49424

Consent Agreement and Final Order, Docket No. **EPCRA-05-2007-0036**

Dear Mr. Steeby:

I have enclosed an original signed copy of a fully executed Consent Agreement and Final Order in resolution of the above case. This document was filed on September 27, 2007, with the Regional Hearing Clerk.

The civil penalty in the amount of $3,836 is to be paid in the manner prescribed in paragraphs 29 and 30. Please be certain that the number **BD** 2750744E033 and the docket number are written on both the transmittal letter and on the check. The payment is due by October 29, 2007.

Thank you for your cooperation in resolving this matter.

Sincerely,

Scott Cooper for

David Star
Pesticides and Toxics Compliance Section

Enclosures

cc: Marcy Toney, Regional Judicial Officer/C-14J (w/Encl.)
Craig Melodia,ORC/C-14J (w/Encl.)
Eric Volck, Cincinnati Finance/MWD (w/Encl.)

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on 100% Recycled Paper (50% Postconsumer)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

In the Matter of:	)	**Docket No.** EPCRA-05-2007-0036
	)	
EBW Electronics, Inc.	)	**Proceeding to Assess a Civil Penalty**
Holland, Michigan	)	**Under Section 325(c) of the Emergency**
	)	**Planning and Community Right-to-Know**
Respondent	)	**Act of 1986, 42 U.S.C. § 11045(c)**
	)	

2007 SEP 27 AM 11:09
REGIONAL HEARING CLERK
US

Consent Agreement and Final Order

Preliminary Statement

1. This is an administrative action commenced and concluded under Section 325(c) of the Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA), 42 U.S.C. § 11045(c), and Sections 22.13(b), 22.18(b)(2), and 22.18(b)(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. The Complainant is the Director of the Land and Chemicals Division, United States Environmental Protection Agency (U.S. EPA), Region 5.

3. Respondent is EBW Electronics, Inc., a corporation doing business in the state of Michigan.

4. 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 consent agreement and final order (CAFO). 40 C.F.R. § 22.13(b).

5. 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.

6. Respondent consents to the assessment of the civil penalty specified in this CAFO, and to the terms of this CAFO.

Jurisdiction and Waiver of Right to Hearing

7. Respondent admits the jurisdictional allegations in this CAFO and neither admits nor denies the factual allegations in this CAFO.

8. 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.

9. Respondent certifies that it is complying with Section 313 of EPCRA, 42 U.S.C. § 11023.

Statutory and Regulatory Background

10. The U.S. EPA promulgated the Toxic Chemical Release and Reporting Community Right-to-Know Rule at 40 C.F.R. Part 372 pursuant to Sections 313 and 328 of EPCRA, 42 U.S.C. §§ 11023 and 11048.

11. Section 313(b) of EPCRA, 42 U.S.C. § 11023(b), and 40 C.F.R. § 372.22 provide that the requirements of Section 313 and Part 372 apply to any facility that has 10 or more full-time employees and a Standard Industrial Classification (SIC) Code of 3679, and that manufactures, imports, processes, or otherwise uses a toxic chemical identified at Section 313(c) and listed at 40 C.F.R. § 372.65 in an amount that exceeds the threshold for reporting, as set forth in Section 313(f) and in 40 C.F.R. §§ 372.25, 372.27, and 372.28.

12. Section 313(a) of EPCRA, 42 U.S.C. § 11023(a), and 40 C.F.R. § 372.30 require the owner or operator of a facility subject to the requirements of Section 313 and Part 372 to complete and submit to the Administrator of U.S. EPA and to the state in which the facility is

located, no later than July 1, 1988 and each July 1 thereafter, a chemical release form published pursuant to Section 313(g) for each toxic chemical listed under Section 313(c) that was manufactured, processed, or otherwise used at the facility during the preceding calendar year in a quantity exceeding the threshold established by Section 313(f) or pursuant to Section 313(f)(2).

13. The U.S. EPA published the Toxic Chemical Release Inventory Reporting Form, U.S. EPA Form 9350-1 (1-88) (Form R), as described at 40 C.F.R. § 372.85, pursuant to Section 313(g) of EPCRA, 42 U.S.C. § 11023(g).

14. All persons required to report pursuant to Section 313(b) must use Form R according to Section 313(a) of EPCRA, 42 U.S.C. § 11023(a).

15. The Administrator of U.S. EPA may prescribe regulations as may be necessary to carry out EPCRA. 42 U.S.C. § 11048.

16. Section 325(c)(1) and (3) of EPCRA, 42 U.S.C. §§ 11045(c)(1) and (3), authorizes the Administrator of U.S. EPA to assess a civil penalty of up to $25,000 per day for each violation of Section 313 of EPCRA, 42 U.S.C. § 11023. The Federal Civil Penalties Inflation Adjustment Act of 1990, 28 U.S.C. § 2462 note (1990), as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 note (1996), required federal agencies to issue regulations adjusting for inflation the maximum civil penalties that can be imposed pursuant to each agency's statutes. The U.S. EPA may assess a civil penalty of up to $27,500 per day for each violation of Section 313 that occurred from January 31, 1997 through March 15, 2004, and may assess a civil penalty of up to $32,500 per day for each violation of Section

313 that occurred after March 15, 2004, pursuant to Section 325(c)(1) and (3) of EPCRA, 42 U.S.C. §§ 11045(c)(1) and (3), and 40 C.F.R. Part 19.

Factual Allegations and Alleged Violations

17. Respondent is a *person*, as that term is defined at Section 329(7) of EPCRA, 42 U.S.C. § 11049(7).

18. At all times relevant to this CAFO, Respondent was an owner and operator of the facility located at 701 Commerce Court, Holland, Michigan (Commerce Court Facility).

19. At all times relevant to this CAFO, Respondent had 10 or more *full-time employees*, as that term is defined at 40 C.F.R. § 372.3, and was an employer at the facility.

20. Respondent's Commerce Court Facility consists of buildings, equipment, structures, and other stationary items which are located on a single site or on contiguous or adjacent sites and which were owned by the same person, entity, or corporation.

21. Respondent's Commerce Court Facility is a *facility*, as that term is defined at Section 329(4) of EPCRA, 42 U.S.C. § 11049(4).

22. During calendar year 2004, the facility had an SIC code of 3679, which is a covered SIC code as defined at Section 313 of EPCRA, 42 U.S.C. § 11023, and 40 C.F.R. § 372.22.

23. During calendar year 2004, the Commerce Court Facility *processed*, as that term is defined at 40 C.F.R. § 372.3, lead, a chemical category or CAS No. listed under 40 C.F.R. § 372.65, in the amount of 1,403 pounds, which is greater than 100 pounds, the threshold for reporting, as set forth in Section 313(f)(2) of EPCRA, 42 U.S.C. § 11023(f)(2), and 40 C.F.R. § 372.28.

24. Respondent was required to submit to the Administrator of U.S. EPA and to Michigan a Form R for lead (CASRN 7439-92-1) for calendar year 2004 by July 1, 2005.

25. Respondent did not submit to the Administrator of U.S. EPA and to Michigan a Form R for lead for calendar year 2004 by July 1, 2005.

26. Respondent submitted a Form R for lead to the Administrator of U.S. EPA and to Michigan on July 13, 2006 for calendar year 2004.

27. Respondent's failure to timely submit a Form R for lead to the Administrator of U.S. EPA and to Michigan for calendar year 2004 violated Section 313 of EPCRA, 42 U.S.C. § 11023, and 40 C.F.R. § 372.30.

Civil Penalty

28. Pursuant to Section 325 of EPCRA, 42 U.S.C. § 11045, Complainant determined that an appropriate civil penalty to settle this action is $3,836. In determining the penalty amount, Complainant considered the nature, circumstances, extent and gravity of the violations, and with respect to Respondent, its ability to pay, prior history of violations, economic benefit or savings resulting from the violations, and its agreement to perform a supplemental environmental project, and any other matters as justice may require. Complainant also considered U.S. EPA's *Enforcement Response Policy for Section 313 of the Emergency Planning and Community Right-to-Know Act (1986) and Section 6607 of the Pollution Prevention Act (1990) (amended)* (April 12, 2001). Respondent has the choice of three payment methods, as described below: payment by check, payment by debit or credit card, or payment by electronic funds transfer.

29. Within 30 days of the effective date of this CAFO, Respondent must pay a $3,836 civil penalty for the EPCRA violation.

30. Respondent must submit the civil penalty identified in paragraph 29 of this CAFO by using one of the three payment methods listed below:

a. If Respondent chooses to pay the penalty by check via standard U.S. mail, send a cashier's check or certified check, payable to "Treasurer, United States of America," to:

U.S. EPA – Region 5
P.O. Box 371531
Pittsburgh, PA 15251-7531

b. If Respondent chooses to pay the penalty by check via certified or overnight mail, send a cashier's check or certified check, payable to "Treasurer, United States of America," to:

Mellon Client Service Center
Attn: Shift Supervisor
Lockbox 371531
500 Ross Street
Pittsburgh, PA 15262 – 0001

c. If Respondent chooses to pay penalty by check, a transmittal letter, stating Respondent's name, the case title, Respondent's complete address, the case docket number, and the billing document number must accompany the payment. Respondent must send a copy of the check and transmittal letter to the following addressees:

Regional Hearing Clerk (E-13J)
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

David Star (DT-8J)
Pesticides and Toxics Compliance Section
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

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

d. If Respondent chooses to pay the penalty by check, the check must note the case title, the docket number of this CAFO, and the billing document number.

e. If Respondent chooses to pay the penalty online using an ACH debit or credit card, please visit www.pay.gov. Using the *Search Public Forms* option on the tool bar on the left side of the page, enter *SFO 1.1* in the search field. Open the form and complete the information requested.

f. If Respondent chooses to pay the penalty using an electronic funds transfer, make the transfer payable to "Treasurer, United States of America," and send it to:

Federal Reserve Bank of New York
ABA No. 021030004
Account No. 68010727
33 Liberty Street
New York, NY 10045
Field Tag 4200 of the Fedwire message should read:
"D 68010727 Environmental Protection Agency"

In the comment or description field of the electronic funds transfer, state the case title, the docket number of this CAFO and the billing document number.

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

32. If Respondent does not timely pay the civil penalty, or any stipulated penalties due under paragraph 39 of this CAFO, 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.

33. Pursuant to 31 C.F.R. § 901.9, Respondent must pay interest, penalty, and/or charges on any amount overdue under this CAFO. Interest will accrue on any amount overdue from the date the payment was due at a rate established pursuant to 31 U.S.C. § 3717. 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% per year penalty on any principal amount 90 days past due.

Supplemental Environmental Project

34. Respondent agrees to take the steps required in this CAFO to complete a Supplemental Environmental Project (SEP) to abate and/or mitigate lead-based paint hazards in selected residential housing units located in the Holland, Michigan area (the Selected Projects). The Selected Projects have been selected and will be monitored by the State of Michigan Department of Community Health, Lead and Healthy Homes Section (Michigan DCH), and completed by a qualified lead abatement contractor.

35. Within 30 days of receipt of the fully executed CAFO, Respondent will fund the Selected Projects in the amount of $11,509 (Respondent's SEP Funds). Respondent will complete and submit a SEP Completion Report to U.S. EPA following expenditure of

Respondent's SEP Funds on the Selected Projects. The SEP Completion Report shall include the following information:

a. The addresses at which the Selected Projects have been completed and the dates on which the work was completed;

b. The dates on which Michigan DCH disbursed all or part of Respondent's SEP Funds;

c. A summary of the work performed at each address, and the name and address of each contractor which performed the work; and

d. Documentation that clearance was conducted after such lead-based paint hazard abatement and/or mitigation activities were performed at each of the Selected Projects, to determine that the hazard abatement activities are complete and that no settled dust-lead hazards exist.

36. Respondent will procure from the Michigan DCH the information necessary to complete the SEP Completion Report within 30 days of completion of the last of the Selected Projects. Respondent agrees to provide a Status Report to U.S. EPA every 90 days from the effective date of this CAFO, until the SEP is complete and Respondent submits the Completion Report. Each SEP Status Report shall contain a report of the current status of each of the Selected Projects, the amount of money spent to date, and the anticipated completion date of each uncompleted Selected Project.

37. On or before June 30, 2008, Respondent will ensure that Michigan DCH completes each of the Selected Projects and has spent the entirety of Respondent's SEP Funds. If Michigan DCH has not completed each of the Selected Projects by June 30, 2008,

Respondent must provide U.S. EPA a verified statement, by August 1, 2008, that Michigan DCH has not completed each of the Selected Projects or to have spent the entirety of Respondent's SEP Funds.

38. Respondent certifies that it is not required to perform the SEP by any law, regulation, grant, order, or any other agreement, or as injunctive relief as of the date Respondent sign this CAFO. Respondent further certifies that it has not received, and is not negotiating to receive, credit for the SEP in any other enforcement action.

39. Respondent must submit copies of all documents or reports required by this CAFO to be submitted to U.S. EPA to David Star by first class mail at the address in paragraph 30(c) of this CAFO.

40. If Respondent violates requirements of this CAFO relating to the SEP, Respondent must pay stipulated penalties to the United States in addition to the $3,836 penalty described in paragraph 29 of this CAFO, as follows:

a. If Respondent fails to pay Michigan DCH Respondent's SEP Funds in full, in the time period specified in paragraph 35, Respondent agrees to pay the U.S. EPA a stipulated penalty of $100 for each day the full payment is overdue.

b. If Respondent fails to submit to U.S. EPA any document required by paragraphs 35 or 36 of this CAFO, Respondent must pay U.S. EPA a stipulated penalty of $50 for each day the document is overdue.

c. In no circumstance will Respondent pay stipulated penalties due to U.S. EPA under terms of this CAFO in an amount exceeding $12,000.

41. Respondent must pay any stipulated penalties within 15 days of receiving U.S. EPA's written demand for the penalties. All penalties shall begin to accrue on the first date of noncompliance, and shall continue to accrue through the date of completion. Respondent will use the one of the three methods of payment detailed in paragraph 30 of this CAFO, and will pay interest, handling charges, and nonpayment penalties on any overdue amounts.

42. Complainant will consider Respondent to have completed the terms of the SEP when Michigan DCH has fully expended Respondent's SEP Funds, when Respondent has paid any stipulated penalties that may be due under paragraph 40 of this CAFO, and when Respondent has ensured that U.S. EPA has received copies of the following documents:

a. The cancelled check for Respondent's SEP Funds;

b. Any necessary SEP Status Reports; and

c. The SEP Completion Report.

General Provisions

43. This CAFO resolves only Respondent's liability for federal civil penalties for the violations and facts alleged in the CAFO.

44. This CAFO does not affect the right of the U.S. EPA or the United States to pursue appropriate injunctive or other equitable relief or criminal sanctions for any violations of law.

45. This CAFO does not affect Respondent's responsibility to comply with EPCRA and other applicable federal, state, and local laws and regulations.

46. This CAFO is a *final order* for purposes of U.S. EPA's Enforcement Response Policy for Section 313 of EPCRA.

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

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

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

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

EBW Electronics, Inc., Respondent

9/14/07
Date

Cory Steeby, President
EBW Electronics, Inc.

United States Environmental Protection Agency, Region 5, Complainant

9/21/07
Date

Margaret M. Guerriero, Director
Land and Chemicals Division

EPCRA-05-2007-0036

2007 SEP 27 AM 11:09
REGIONAL HEARING CLERK
US EPA

In the Matter of:
EBW Electronics, Inc.
Docket No. EPCRA-05-2007-0036

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.

9/24/07
Date

Walter W. Kovalick Jr. for
Mary A. Gade
Regional Administrator
United States Environmental Protection Agency
Region 5

2007 SEP 27 AM 11:09
REGIONAL HEARING CLERK

CERTIFICATE OF SERVICE

I hereby certify that the original signed copy of the Consent Agreement and Final Order in resolution of the civil administrative action involving EBW Electronics, Inc., was filed on September 27, 2007, with the Regional Hearing Clerk (E-13J), United States Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, Chicago, Illinois 60604-3590, and that I mailed by Certified Mail, Receipt No. 7001 0320 0006 0185 8344, a copy of the original to the Respondents:

Cory Steeby, President
EBW Electronics, Inc
13110 Ransom Street
Holland, MI 49424

and forwarded copies (intra-Agency) to:

Marcy Toney, Regional Judicial Officer, ORC/C-14J
Craig Melodia, Counsel for Complainant/C-14J
Eric Volck, Cincinnati Finance/MWD (w/Encl.)

Elizabeth Lytle

Elizabeth Lytle
Pesticides and Toxics Compliance Section
U.S. EPA - Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Docket No. **EPCRA-05-2007-0036**

2007 SEP 27 AM 11: 09
REGIONAL HEARING CLERK
US EPA

Waste, Pesticides and Toxics Division

Type of Document: Follow-up Letter

Name of Document (Facility Name & Location): EBW Electronics, Inc., Holland, Michigan

---

Receipt # 7001 0320 0005 8918 0703 **Originator/Phone:** Estrella Calvo 3-8931

NOTE: Originator and first level supervisor are responsible for assuring that documents are in plain language. All other reviewers should consider plain language in their reviews. See the plain language checklist on the reverse side of this sheet.

Date	Name	Initials
11/27/2007	**Author: Estrella Calvo**	EC 11/28/07
11/29/07	**Anthony L. Restaino, Chief** **Wastes Pesticides and Toxics Enforcement Section**	ALR

Return to Estrella Calvo **Correction Required**
(attach official file copy/return w/originator's copy)

REMARKS/COMMENTS:

Plain Language Checklist

Write in the active voice. When you use the active voice, the subject of the sentence acts: "EPA issued the permit to X." When you use the passive voice, the subject of the sentence is acted upon: "The permit was issued to X." If you can ask "By whom?" or "By what?" after the verb, the verb is in the passive voice. A passive verb has a form of the verb "to be" (am, is, are, was, were, be, being, been) plus a main verb usually ending in "en" or "ed."

Use action verbs. Use base verbs instead of nouns derived from verbs.

Don't Say **Say**

Don't Say	**Say**	is applicable to	applies to
make payment	pay	give consideration to	consider
take action	act		

Use personal pronouns to represent the reader and to refer to EPA. For example, "The United States Environmental Protection Agency is issuing an order to X (you). We are requiring you..."

Write short sentences to aid comprehension. Put one main thought in most sentences. Divide a long sentence into two or three short sentences. Remove all unnecessary words. If there are several conditions or subordinate provisions, make a list.

Omit surplus words and redundancies. Question the need for ~~each and~~ every word.

Don't Say	**Say**	
Redundancies	for the period of	for
true and correct	in order to	to
cease and desist	in the event that	if
order and direct		

Place words carefully to reduce ambiguity. Keep subjects and objects close to verbs. Put modifying phrases and words such as "only" and "always" next to the word they modify.
She *only* said that he hired her. She said that *only* he hired her. She said that he hired *only* her.

Be consistent. Don't use different words to refer to the same thing (car, vehicle, automobile).

Limit your use of abbreviations, acronyms, and capital letters. Use abbreviations and acronyms to refer only to terms that are central to the document. Do not abbreviate terms that you use only a few times. Use capital letters to begin sentences and for proper names and for headings. You should reconsider all other uses.

Visit the government's plain language wet site at www.plainlanguage.gov.

MEMORANDUM OF CALL

Previous editions usable

TO:

☐ YOU WERE CALLED BY— ☐ YOU WERE VISITED BY—

OF (Organization) EBW

☐ PLEASE PHONE ▶ (Enter area code, if necessary) 616-399-0261 ☐ DSN

Penalty numbers.

☐ WILL CALL AGAIN ☐ IS WAITING TO SEE YOU

☐ RETURNED YOUR CALL ☐ WISHES AN APPOINTMENT

MESSAGE

21,922
.7
15,345

15,345
.25
3,836.

11,509

RECEIVED BY | DATE | TIME

NSN 7540-00-634-4018
50363-111
UNICOR FPI-SST

OPTIONAL FORM 363 (Rev. 7-94)
General Services Administration

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

CRESTOR®
rosuvastatin calcium

ON OF:

Wes Priem –
MICHIGAN DEPARTMENT
OF COMMUNITY HEALTH
HEALTHY HOMES SECTION
ATT: WESLEY F. PRIEM
P.O. BOX 30195
LANSING, MI 48909

CHECK PAYABLE TO:
STATE OF MICHIGAN

CERTIFIED MAIL
Receipt No. 7001 03

Cory Steeby, Preside
EBW Electronics, In
13110 Ransom Stree
Holland, MI 49424

RA-05-2007-0036

Dear Mr. Steeby:

ement and Final
7, 2007, with the

scribed in

and the

ayment is due by

atter.

Encl.)

EBW –
(616) 399-0261

→ MCH
Wes Priem –
(517) 335-9390
left message @ 11:10 am
for Mr. Priem.

crestor.com 241417 5/06

crestor.com 241417 5/06

% Recycled Paper (50% Postconsumer)

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

SEP 27 2007

REPLY TO THE ATTENTION OF:
LC-8J

CERTIFIED MAIL
Receipt No. 7001 0320 0006 0185 8344

Cory Steeby, President
EBW Electronics, Inc
13110 Ransom Street
Holland, MI 49424

Consent Agreement and Final Order, Docket No. **EPCRA-05-2007-0036**

Dear Mr. Steeby:

I have enclosed an original signed copy of a fully executed Consent Agreement and Final Order in resolution of the above case. This document was filed on September 27, 2007, with the Regional Hearing Clerk.

The civil penalty in the amount of $3,836 is to be paid in the manner prescribed in paragraphs 29 and 30. Please be certain that the number **BD** 2750744E033 and the docket number are written on both the transmittal letter and on the check. The payment is due by October 29, 2007.

Thank you for your cooperation in resolving this matter.

Sincerely,

Scott Cooper for

David Star
Pesticides and Toxics Compliance Section

Enclosures

cc: Marcy Toney, Regional Judicial Officer/C-14J (w/Encl.)
Craig Melodia,ORC/C-14J (w/Encl.)
Eric Volck, Cincinnati Finance/MWD (w/Encl.)

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on 100% Recycled Paper (50% Postconsumer)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

In the Matter of:	)	**Docket No. EPCRA-05-2007-0036**
	)	
EBW Electronics, Inc.	)	**Proceeding to Assess a Civil Penalty**
Holland, Michigan	)	**Under Section 325(c) of the Emergency**
	)	**Planning and Community Right-to-Know**
Respondent	)	**Act of 1986, 42 U.S.C. § 11045(c)**
	)	

2007 SEP 27 AM 11: 10
RECEIVED
REGIONAL HEARING CLERK
US EPA REGION V

Consent Agreement and Final Order

Preliminary Statement

1. This is an administrative action commenced and concluded under Section 325(c) of the Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA), 42 U.S.C. § 11045(c), and Sections 22.13(b), 22.18(b)(2), and 22.18(b)(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. The Complainant is the Director of the Land and Chemicals Division, United States Environmental Protection Agency (U.S. EPA), Region 5.

3. Respondent is EBW Electronics, Inc., a corporation doing business in the state of Michigan.

4. 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 consent agreement and final order (CAFO). 40 C.F.R. § 22.13(b).

5. 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.

6. Respondent consents to the assessment of the civil penalty specified in this CAFO, and to the terms of this CAFO.

Jurisdiction and Waiver of Right to Hearing

7. Respondent admits the jurisdictional allegations in this CAFO and neither admits nor denies the factual allegations in this CAFO.

8. 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.

9. Respondent certifies that it is complying with Section 313 of EPCRA, 42 U.S.C. § 11023.

Statutory and Regulatory Background

10. The U.S. EPA promulgated the Toxic Chemical Release and Reporting Community Right-to-Know Rule at 40 C.F.R. Part 372 pursuant to Sections 313 and 328 of EPCRA, 42 U.S.C. §§ 11023 and 11048.

11. Section 313(b) of EPCRA, 42 U.S.C. § 11023(b), and 40 C.F.R. § 372.22 provide that the requirements of Section 313 and Part 372 apply to any facility that has 10 or more full-time employees and a Standard Industrial Classification (SIC) Code of 3679, and that manufactures, imports, processes, or otherwise uses a toxic chemical identified at Section 313(c) and listed at 40 C.F.R. § 372.65 in an amount that exceeds the threshold for reporting, as set forth in Section 313(f) and in 40 C.F.R. §§ 372.25, 372.27, and 372.28.

12. Section 313(a) of EPCRA, 42 U.S.C. § 11023(a), and 40 C.F.R. § 372.30 require the owner or operator of a facility subject to the requirements of Section 313 and Part 372 to complete and submit to the Administrator of U.S. EPA and to the state in which the facility is

located, no later than July 1, 1988 and each July 1 thereafter, a chemical release form published pursuant to Section 313(g) for each toxic chemical listed under Section 313(c) that was manufactured, processed, or otherwise used at the facility during the preceding calendar year in a quantity exceeding the threshold established by Section 313(f) or pursuant to Section 313(f)(2).

13. The U.S. EPA published the Toxic Chemical Release Inventory Reporting Form, U.S. EPA Form 9350-1 (1-88) (Form R), as described at 40 C.F.R. § 372.85, pursuant to Section 313(g) of EPCRA, 42 U.S.C. § 11023(g).

14. All persons required to report pursuant to Section 313(b) must use Form R according to Section 313(a) of EPCRA, 42 U.S.C. § 11023(a).

15. The Administrator of U.S. EPA may prescribe regulations as may be necessary to carry out EPCRA. 42 U.S.C. § 11048.

16. Section 325(c)(1) and (3) of EPCRA, 42 U.S.C. §§ 11045(c)(1) and (3), authorizes the Administrator of U.S. EPA to assess a civil penalty of up to $25,000 per day for each violation of Section 313 of EPCRA, 42 U.S.C. § 11023. The Federal Civil Penalties Inflation Adjustment Act of 1990, 28 U.S.C. § 2462 note (1990), as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 note (1996), required federal agencies to issue regulations adjusting for inflation the maximum civil penalties that can be imposed pursuant to each agency's statutes. The U.S. EPA may assess a civil penalty of up to $27,500 per day for each violation of Section 313 that occurred from January 31, 1997 through March 15, 2004, and may assess a civil penalty of up to $32,500 per day for each violation of Section

313 that occurred after March 15, 2004, pursuant to Section 325(c)(1) and (3) of EPCRA, 42 U.S.C. §§ 11045(c)(1) and (3), and 40 C.F.R. Part 19.

Factual Allegations and Alleged Violations

17. Respondent is a *person*, as that term is defined at Section 329(7) of EPCRA, 42 U.S.C. § 11049(7).

18. At all times relevant to this CAFO, Respondent was an owner and operator of the facility located at 701 Commerce Court, Holland, Michigan (Commerce Court Facility).

19. At all times relevant to this CAFO, Respondent had 10 or more *full-time employees*, as that term is defined at 40 C.F.R. § 372.3, and was an employer at the facility.

20. Respondent's Commerce Court Facility consists of buildings, equipment, structures, and other stationary items which are located on a single site or on contiguous or adjacent sites and which were owned by the same person, entity, or corporation.

21. Respondent's Commerce Court Facility is a *facility*, as that term is defined at Section 329(4) of EPCRA, 42 U.S.C. § 11049(4).

22. During calendar year 2004, the facility had an SIC code of 3679, which is a covered SIC code as defined at Section 313 of EPCRA, 42 U.S.C. § 11023, and 40 C.F.R. § 372.22.

23. During calendar year 2004, the Commerce Court Facility *processed*, as that term is defined at 40 C.F.R. § 372.3, lead, a chemical category or CAS No. listed under 40 C.F.R. § 372.65, in the amount of 1,403 pounds, which is greater than 100 pounds, the threshold for reporting, as set forth in Section 313(f)(2) of EPCRA, 42 U.S.C. § 11023(f)(2), and 40 C.F.R. § 372.28.

24. Respondent was required to submit to the Administrator of U.S. EPA and to Michigan a Form R for lead (CASRN 7439-92-1) for calendar year 2004 by July 1, 2005.

25. Respondent did not submit to the Administrator of U.S. EPA and to Michigan a Form R for lead for calendar year 2004 by July 1, 2005.

26. Respondent submitted a Form R for lead to the Administrator of U.S. EPA and to Michigan on July 13, 2006 for calendar year 2004.

27. Respondent's failure to timely submit a Form R for lead to the Administrator of U.S. EPA and to Michigan for calendar year 2004 violated Section 313 of EPCRA, 42 U.S.C. § 11023, and 40 C.F.R. § 372.30.

Civil Penalty

28. Pursuant to Section 325 of EPCRA, 42 U.S.C. § 11045, Complainant determined that an appropriate civil penalty to settle this action is $3,836. In determining the penalty amount, Complainant considered the nature, circumstances, extent and gravity of the violations, and with respect to Respondent, its ability to pay, prior history of violations, economic benefit or savings resulting from the violations, and its agreement to perform a supplemental environmental project, and any other matters as justice may require. Complainant also considered U.S. EPA's *Enforcement Response Policy for Section 313 of the Emergency Planning and Community Right-to-Know Act (1986) and Section 6607 of the Pollution Prevention Act (1990) (amended)* (April 12, 2001). Respondent has the choice of three payment methods, as described below: payment by check, payment by debit or credit card, or payment by electronic funds transfer.

29. Within 30 days of the effective date of this CAFO, Respondent must pay a $3,836 civil penalty for the EPCRA violation.

30. Respondent must submit the civil penalty identified in paragraph 29 of this CAFO by using one of the three payment methods listed below:

a. If Respondent chooses to pay the penalty by check via standard U.S. mail, send a cashier's check or certified check, payable to "Treasurer, United States of America," to:

U.S. EPA – Region 5
P.O. Box 371531
Pittsburgh, PA 15251-7531

b. If Respondent chooses to pay the penalty by check via certified or overnight mail, send a cashier's check or certified check, payable to "Treasurer, United States of America," to:

Mellon Client Service Center
Attn: Shift Supervisor
Lockbox 371531
500 Ross Street
Pittsburgh, PA 15262 – 0001

c. If Respondent chooses to pay penalty by check, a transmittal letter, stating Respondent's name, the case title, Respondent's complete address, the case docket number, and the billing document number must accompany the payment. Respondent must send a copy of the check and transmittal letter to the following addressees:

Regional Hearing Clerk (E-13J)
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

David Star (DT-8J)
Pesticides and Toxics Compliance Section
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

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

d. If Respondent chooses to pay the penalty by check, the check must note the case title, the docket number of this CAFO, and the billing document number.

e. If Respondent chooses to pay the penalty online using an ACH debit or credit card, please visit www.pay.gov. Using the *Search Public Forms* option on the tool bar on the left side of the page, enter *SFO 1.1* in the search field. Open the form and complete the information requested.

f. If Respondent chooses to pay the penalty using an electronic funds transfer, make the transfer payable to "Treasurer, United States of America," and send it to:

Federal Reserve Bank of New York
ABA No. 021030004
Account No. 68010727
33 Liberty Street
New York, NY 10045
Field Tag 4200 of the Fedwire message should read:
"D 68010727 Environmental Protection Agency"

In the comment or description field of the electronic funds transfer, state the case title, the docket number of this CAFO and the billing document number.

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

32. If Respondent does not timely pay the civil penalty, or any stipulated penalties due under paragraph 39 of this CAFO, 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.

33. Pursuant to 31 C.F.R. § 901.9, Respondent must pay interest, penalty, and/or charges on any amount overdue under this CAFO. Interest will accrue on any amount overdue from the date the payment was due at a rate established pursuant to 31 U.S.C. § 3717. 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% per year penalty on any principal amount 90 days past due.

Supplemental Environmental Project

34. Respondent agrees to take the steps required in this CAFO to complete a Supplemental Environmental Project (SEP) to abate and/or mitigate lead-based paint hazards in selected residential housing units located in the Holland, Michigan area (the Selected Projects). The Selected Projects have been selected and will be monitored by the State of Michigan Department of Community Health, Lead and Healthy Homes Section (Michigan DCH), and completed by a qualified lead abatement contractor.

35. Within 30 days of receipt of the fully executed CAFO, Respondent will fund the Selected Projects in the amount of $11,509 (Respondent's SEP Funds). Respondent will complete and submit a SEP Completion Report to U.S. EPA following expenditure of

Respondent's SEP Funds on the Selected Projects. The SEP Completion Report shall include the following information:

a. The addresses at which the Selected Projects have been completed and the dates on which the work was completed;

b. The dates on which Michigan DCH disbursed all or part of Respondent's SEP Funds;

c. A summary of the work performed at each address, and the name and address of each contractor which performed the work; and

d. Documentation that clearance was conducted after such lead-based paint hazard abatement and/or mitigation activities were performed at each of the Selected Projects, to determine that the hazard abatement activities are complete and that no settled dust-lead hazards exist.

36. Respondent will procure from the Michigan DCH the information necessary to complete the SEP Completion Report within 30 days of completion of the last of the Selected Projects. Respondent agrees to provide a Status Report to U.S. EPA every 90 days from the effective date of this CAFO, until the SEP is complete and Respondent submits the Completion Report. Each SEP Status Report shall contain a report of the current status of each of the Selected Projects, the amount of money spent to date, and the anticipated completion date of each uncompleted Selected Project.

37. On or before June 30, 2008, Respondent will ensure that Michigan DCH completes each of the Selected Projects and has spent the entirety of Respondent's SEP Funds. If Michigan DCH has not completed each of the Selected Projects by June 30, 2008,

Respondent must provide U.S. EPA a verified statement, by August 1, 2008, that Michigan DCH has not completed each of the Selected Projects or to have spent the entirety of Respondent's SEP Funds.

38. Respondent certifies that it is not required to perform the SEP by any law, regulation, grant, order, or any other agreement, or as injunctive relief as of the date Respondent sign this CAFO. Respondent further certifies that it has not received, and is not negotiating to receive, credit for the SEP in any other enforcement action.

39. Respondent must submit copies of all documents or reports required by this CAFO to be submitted to U.S. EPA to David Star by first class mail at the address in paragraph 30(c) of this CAFO.

40. If Respondent violates requirements of this CAFO relating to the SEP, Respondent must pay stipulated penalties to the United States in addition to the $3,836 penalty described in paragraph 29 of this CAFO, as follows:

a. If Respondent fails to pay Michigan DCH Respondent's SEP Funds in full, in the time period specified in paragraph 35, Respondent agrees to pay the U.S. EPA a stipulated penalty of $100 for each day the full payment is overdue.

b. If Respondent fails to submit to U.S. EPA any document required by paragraphs 35 or 36 of this CAFO, Respondent must pay U.S. EPA a stipulated penalty of $50 for each day the document is overdue.

c. In no circumstance will Respondent pay stipulated penalties due to U.S. EPA under terms of this CAFO in an amount exceeding $12,000.

41. Respondent must pay any stipulated penalties within 15 days of receiving U.S. EPA's written demand for the penalties. All penalties shall begin to accrue on the first date of noncompliance, and shall continue to accrue through the date of completion. Respondent will use the one of the three methods of payment detailed in paragraph 30 of this CAFO, and will pay interest, handling charges, and nonpayment penalties on any overdue amounts.

42. Complainant will consider Respondent to have completed the terms of the SEP when Michigan DCH has fully expended Respondent's SEP Funds, when Respondent has paid any stipulated penalties that may be due under paragraph 40 of this CAFO, and when Respondent has ensured that U.S. EPA has received copies of the following documents:

a. The cancelled check for Respondent's SEP Funds;

b. Any necessary SEP Status Reports; and

c. The SEP Completion Report.

General Provisions

43. This CAFO resolves only Respondent's liability for federal civil penalties for the violations and facts alleged in the CAFO.

44. This CAFO does not affect the right of the U.S. EPA or the United States to pursue appropriate injunctive or other equitable relief or criminal sanctions for any violations of law.

45. This CAFO does not affect Respondent's responsibility to comply with EPCRA and other applicable federal, state, and local laws and regulations.

46. This CAFO is a *final order* for purposes of U.S. EPA's Enforcement Response Policy for Section 313 of EPCRA.

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

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

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

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

EBW Electronics, Inc., Respondent

9/14/07
Date

Cory Steeby, President
EBW Electronics, Inc.

United States Environmental Protection Agency, Region 5, Complainant

9/21/07
Date

Margaret M. Guerriero, Director
Land and Chemicals Division

EPCRA-05-2007-0036

RECEIVED
REGIONAL HEARING CLERK
US EPA REGION V
2007 SEP 27 AM 11: 10

In the Matter of:
EBW Electronics, Inc.
Docket No. EPCRA-05-2007-0036

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.

9/24/07
Date

Walter W. Karalak for
Mary A. Gade
Regional Administrator
United States Environmental Protection Agency
Region 5

2007 SEP 27 AM 11:10
RECEIVED
REGIONAL HEARING CLERK
US EPA REGION V

CERTIFICATE OF SERVICE

I hereby certify that the original signed copy of the Consent Agreement and Final Order in resolution of the civil administrative action involving EBW Electronics, Inc., was filed on September 27, 2007, with the Regional Hearing Clerk (E-13J), United States Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, Chicago, Illinois 60604-3590, and that I mailed by Certified Mail, Receipt No. 7001 0320 0006 0185 8344, a copy of the original to the Respondents:

Cory Steeby, President
EBW Electronics, Inc
13110 Ransom Street
Holland, MI 49424

and forwarded copies (intra-Agency) to:

Marcy Toney, Regional Judicial Officer, ORC/C-14J
Craig Melodia, Counsel for Complainant/C-14J
Eric Volck, Cincinnati Finance/MWD (w/Encl.)

Elizabeth Lytle

Elizabeth Lytle
Pesticides and Toxics Compliance Section
U.S. EPA - Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Docket No. **EPCRA-05-2007-0036**

2007 SEP 27 AM 11: 10
RECEIVED
REGIONAL HEARING CLERK
US EPA REGION V

LAND AND CHEMICAL DIVISION
CORRESPONDENCE FOR
REGIONAL ADMINISTRATOR'S SIGNATURE

Type of Document: **EPRCA CAFO**

Name of Document: **EBW Electronics, Inc.**

Document#_____ **Originator/Phone:** **3-5871**

NOTE: Originator and first level supervisor are responsible for assuring that documents are in plain language. All other reviewers should consider plain language in their reviews. See the plain language checklist on the reverse side of this sheet.

Date	Name	Secretary/Chief Initials
09/20/2007	for Author: Bob Allen	EL 9/19/07
09/20/2007	for Anthony L. Restaino, Chief Pesticides and Toxics Compliance Section	
9-21-07	Mardi Klevs, Chief Chemical Management Branch	MLB 9/20/07
9/21/07	Margaret M. Guerriero, Director Land and Chemicals Division	
9/24/07	Bharat Mathur Deputy Regional Administrator	
	Mary A. Gade Regional Administrator	

Return to: Elizabeth Lytle 6-4348 **Correction Required**_____
(attach official file copy/return w/originator's copy)

REMARKS/COMMENTS:_____

Office of the
REGIONAL ADMINISTRATOR

EPA
Region 5
77 W Jackson Blvd.
Chgo., IL – 60604
Illinois Indiana Michigan
Minnesota Ohio Wisconsin

Correspondence for RA's Signature

Type of Document: CAFO

Name of Document: EBW ELECTRONICS, INC.

Date Rec'd in ORA: 09/24/2007 *From:* LCD

Contact Name: BOB ALLEN *Phone:* 3-5871

DATE	NAME	INITIALS
9/24/07	Julie Spellman (Executive Assistant)	
	Cynthia Faur (Senior Advisor)	
	Bharat Mathur (Deputy Regional Administrator)	
9/24	Mary A. Gade (Regional Administrator)	

Correction Required? Yes No

Remarks: WHEN SIGNED RETURN TO ELIZABETH LYTLE

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

September 20, 2007

REPLY TO THE ATTENTION OF:
LC-8J

MEMORANDUM

SUBJECT: LEGAL DOCUMENTS FOR SIGNATURE

FROM: Mardi Klevs, Chief
Chemicals Management Branch

TO: Margaret M. Guerriero, Director
Land and Chemicals Division

Mary A. Gade
Regional Administrator

SEP 24 2007 orginal signed by Walter Kovalick

EBW Electronics, Inc.

Attached are two copies of a CAFO (with ORC concurrence) in settlement of an EPCRA action taken against respondent for failure to file the Toxic Chemical Release Inventory Reporting Form (Form R) in a timely manner. Respondent agrees to a civil penalty of $3,836 and a SEP of $11,509.

The Pesticides and Toxics Compliance Section has reviewed this document and concurs in its issuance. Thank you.

Attachments

MKC 9-21-07

LC-8J:RESTIANO:CROSETTO:EBW ELECTRONICS, INC

09/20/2007

MB 9/20/07

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on 100% Recycled Paper (50% Postconsumer)

DEC 15 1992

ENFORCEMENT AND COMPLIANCE ASSURANCE (Non -confidential Item)

U.S. EPA Region 5 enters Consent Agreement and Final Order with EBW Electronics, Inc., Including a Supplemental Environmental Project to Abate Lead-Based Paint Hazards in Holland, Michigan.

On , 2007, the Region 5 Regional Administrator signed a Final Order concluding an administrative action against EBW Electronics, Inc., under Section 325(c) of EPCRA. The Consent Agreement alleged that during calendar year 2004, EBW Electronics processed 1,400 pounds of lead, and violated Section 313 of EPCRA by failing to timely submit a Form R. A civil penalty of $15,345 was calculated, which includes a 30% reduction for cooperation and compliance. EBW Electronics will pay $3,836 to settle this action. In addition to the penalty, EBW Electronics will fund a SEP project valued at $11,509, that will be monitored by the Michigan Department of Community Health, Lead and Healthy Homes Section (Michigan DCH), and conducted by a qualified lead abatement contractor, to abate and/or mitigate lead-based paint hazards in three residential housing units located in Holland, Michigan. (Contacts: Craig Melodia, (312) 353-8870, and Tom Crosetto (312) 886-6294)

OFFICE OF REGIONAL COUNSEL CONCURRENCE SHEET

SUBJECT: **EBW Electronics, Inc. Consent Agreement & Final Order**

CONTROL NO. (if applicable): DRAFT CAFO for DRAFT CONCURRENCE ONLY

Originator and first level supervisor are responsible for assuring that documents are in plain language. All other reviewers should consider plain language in their reviews. *See* plain language checklist on reverse side of this sheet.

Originator	(Melodia	)	Date 8/8/07
Section Chief	(Garber	)	Date 8/22/07
Branch Chief	(Cohen	)	Date 8/22/07
Deputy RC	(Frey	)	Date 8/22/2007
Regional Counsel	(Kaplan (Acting)	) RAK	Date 8/22/2007

COMMENTS: NOTE: **RC CONCURRENCE REQUESTED - CAFO HAS NOT YET BEEN SENT TO RESPONDENT. PLEASE CALL 3-8870 FOR PICKUP**

(PLEASE INDICATE NAME OF APPROPRIATE DIVISION(S) WHERE CONCURRENT SIGNOFF IS NECESSARY)

NAME OF DIVISION LCD

Assigned Staff Person	(Crosetto	) TJC	Date 8/23/07
Section Chief	(Restaino	) AER	Date 8/23/07
Branch Chief	for (Klaus	) ACR	Date 8/23/07
Division Director	(~~Cuerriero~~	)	Date

OFFICE OF REGIONAL ADMINISTRATOR (**FINAL ORDER ONLY**)

Deputy AR	(Mathur	)	Date
Regional Administrator	(Gade	)	Date

RETURN TO ORC-Melodia (3-8870)(C-14J) 11/04/03 Version

Plain Language Checklist

Write in the active voice. When you use the active voice, the subject of the sentence acts: "EPA issued the permit to X." When you use the passive voice, the subject of the sentence is acted upon: "The permit was issued to X." If you can ask "By whom?" or "By what?" after the verb, the verb is in the passive voice. A passive verb has a form of the verb "to be" (am, is, are, was, were, be, being, been) plus a main verb usually ending in "en" or "ed."

Use action verbs. Use base verbs instead of nouns derived from verbs.

Don't Say	Say	Don't Say	Say
is applicable to	applies to	make payment	pay
give consideration to	consider	take action	act

Use personal pronouns to represent the reader and to refer to EPA. For example, "The United States Environmental Protection Agency is issuing an order to X (you). We are offering you..."

Write short sentences to aid comprehension. Put one main thought in most sentences. Divide a long sentence into two or three short sentences. Remove all unnecessary words. If there are several conditions or subordinate provisions, make a list.

Omit surplus words and redundancies. Question the need for every word.

Don't Say	Say	Redundancies
for the period of	for	true and correct
in order to	to	cease and desist
in the event that	if	order and direct

Place words carefully to reduce ambiguity. Keep subjects and objects close to verbs. Put modifying phrases and words such as "only" and "always" next to the word they modify.
She *only* said that he hired her. She said that *only* he hired her. She said that he hired *only* her.

Be consistent. Don't use different words to refer to the same thing (car, vehicle, automobile).

Limit your use of abbreviations, acronyms, and capital letters. Use abbreviations and acronyms to refer only to terms that are central to the document. Do not abbreviate terms that you use only a few times. Use capital letters to begin sentences, proper names, and titles and for headings. You should reconsider all other uses.

Visit the government's plain language web site at www.plainlanguage.gov.

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

SEP 27 2007

REPLY TO THE ATTENTION OF:
LC-8J

CERTIFIED MAIL
Receipt No. 7001 0320 0006 0185 8344

Cory Steeby, President
EBW Electronics, Inc
13110 Ransom Street
Holland, MI 49424

Consent Agreement and Final Order, Docket No. **EPCRA-05-2007-0036**

Dear Mr. Steeby:

I have enclosed an original signed copy of a fully executed Consent Agreement and Final Order in resolution of the above case. This document was filed on September 27, 2007, with the Regional Hearing Clerk.

The civil penalty in the amount of $3,836 is to be paid in the manner prescribed in paragraphs 29 and 30. Please be certain that the number **BD** 2750744E033 and the docket number are written on both the transmittal letter and on the check. The payment is due by October 29, 2007.

Thank you for your cooperation in resolving this matter.

Sincerely,

Scott Cooper for

David Star
Pesticides and Toxics Compliance Section

Enclosures

cc: Marcy Toney, Regional Judicial Officer/C-14J (w/Encl.)
Craig Melodia,ORC/C-14J (w/Encl.)
Eric Volck, Cincinnati Finance/MWD (w/Encl.)

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on 100% Recycled Paper (50% Postconsumer)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

In the Matter of:	)	**Docket No. EPCRA-05-2007-0036**
	)	
EBW Electronics, Inc.	)	**Proceeding to Assess a Civil Penalty**
Holland, Michigan	)	**Under Section 325(c) of the Emergency**
	)	**Planning and Community Right-to-Know**
Respondent	)	**Act of 1986, 42 U.S.C. § 11045(c)**
	)	

2007 SEP 27 AM 11: 10
RECEIVED
REGIONAL HEARING CLERK
US EPA REGION V

Consent Agreement and Final Order

Preliminary Statement

1. This is an administrative action commenced and concluded under Section 325(c) of the Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA), 42 U.S.C. § 11045(c), and Sections 22.13(b), 22.18(b)(2), and 22.18(b)(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. The Complainant is the Director of the Land and Chemicals Division, United States Environmental Protection Agency (U.S. EPA), Region 5.

3. Respondent is EBW Electronics, Inc., a corporation doing business in the state of Michigan.

4. 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 consent agreement and final order (CAFO). 40 C.F.R. § 22.13(b).

5. 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.

6. Respondent consents to the assessment of the civil penalty specified in this CAFO, and to the terms of this CAFO.

Jurisdiction and Waiver of Right to Hearing

7. Respondent admits the jurisdictional allegations in this CAFO and neither admits nor denies the factual allegations in this CAFO.

8. 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.

9. Respondent certifies that it is complying with Section 313 of EPCRA, 42 U.S.C. § 11023.

Statutory and Regulatory Background

10. The U.S. EPA promulgated the Toxic Chemical Release and Reporting Community Right-to-Know Rule at 40 C.F.R. Part 372 pursuant to Sections 313 and 328 of EPCRA, 42 U.S.C. §§ 11023 and 11048.

11. Section 313(b) of EPCRA, 42 U.S.C. § 11023(b), and 40 C.F.R. § 372.22 provide that the requirements of Section 313 and Part 372 apply to any facility that has 10 or more full-time employees and a Standard Industrial Classification (SIC) Code of 3679, and that manufactures, imports, processes, or otherwise uses a toxic chemical identified at Section 313(c) and listed at 40 C.F.R. § 372.65 in an amount that exceeds the threshold for reporting, as set forth in Section 313(f) and in 40 C.F.R. §§ 372.25, 372.27, and 372.28.

12. Section 313(a) of EPCRA, 42 U.S.C. § 11023(a), and 40 C.F.R. § 372.30 require the owner or operator of a facility subject to the requirements of Section 313 and Part 372 to complete and submit to the Administrator of U.S. EPA and to the state in which the facility is

located, no later than July 1, 1988 and each July 1 thereafter, a chemical release form published pursuant to Section 313(g) for each toxic chemical listed under Section 313(c) that was manufactured, processed, or otherwise used at the facility during the preceding calendar year in a quantity exceeding the threshold established by Section 313(f) or pursuant to Section 313(f)(2).

13. The U.S. EPA published the Toxic Chemical Release Inventory Reporting Form, U.S. EPA Form 9350-1 (1-88) (Form R), as described at 40 C.F.R. § 372.85, pursuant to Section 313(g) of EPCRA, 42 U.S.C. § 11023(g).

14. All persons required to report pursuant to Section 313(b) must use Form R according to Section 313(a) of EPCRA, 42 U.S.C. § 11023(a).

15. The Administrator of U.S. EPA may prescribe regulations as may be necessary to carry out EPCRA. 42 U.S.C. § 11048.

16. Section 325(c)(1) and (3) of EPCRA, 42 U.S.C. §§ 11045(c)(1) and (3), authorizes the Administrator of U.S. EPA to assess a civil penalty of up to $25,000 per day for each violation of Section 313 of EPCRA, 42 U.S.C. § 11023. The Federal Civil Penalties Inflation Adjustment Act of 1990, 28 U.S.C. § 2462 note (1990), as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 note (1996), required federal agencies to issue regulations adjusting for inflation the maximum civil penalties that can be imposed pursuant to each agency's statutes. The U.S. EPA may assess a civil penalty of up to $27,500 per day for each violation of Section 313 that occurred from January 31, 1997 through March 15, 2004, and may assess a civil penalty of up to $32,500 per day for each violation of Section

313 that occurred after March 15, 2004, pursuant to Section 325(c)(1) and (3) of EPCRA, 42 U.S.C. §§ 11045(c)(1) and (3), and 40 C.F.R. Part 19.

Factual Allegations and Alleged Violations

17. Respondent is a *person*, as that term is defined at Section 329(7) of EPCRA, 42 U.S.C. § 11049(7).

18. At all times relevant to this CAFO, Respondent was an owner and operator of the facility located at 701 Commerce Court, Holland, Michigan (Commerce Court Facility).

19. At all times relevant to this CAFO, Respondent had 10 or more *full-time employees*, as that term is defined at 40 C.F.R. § 372.3, and was an employer at the facility.

20. Respondent's Commerce Court Facility consists of buildings, equipment, structures, and other stationary items which are located on a single site or on contiguous or adjacent sites and which were owned by the same person, entity, or corporation.

21. Respondent's Commerce Court Facility is a *facility*, as that term is defined at Section 329(4) of EPCRA, 42 U.S.C. § 11049(4).

22. During calendar year 2004, the facility had an SIC code of 3679, which is a covered SIC code as defined at Section 313 of EPCRA, 42 U.S.C. § 11023, and 40 C.F.R. § 372.22.

23. During calendar year 2004, the Commerce Court Facility *processed*, as that term is defined at 40 C.F.R. § 372.3, lead, a chemical category or CAS No. listed under 40 C.F.R. § 372.65, in the amount of 1,403 pounds, which is greater than 100 pounds, the threshold for reporting, as set forth in Section 313(f)(2) of EPCRA, 42 U.S.C. § 11023(f)(2), and 40 C.F.R. § 372.28.

24. Respondent was required to submit to the Administrator of U.S. EPA and to Michigan a Form R for lead (CASRN 7439-92-1) for calendar year 2004 by July 1, 2005.

25. Respondent did not submit to the Administrator of U.S. EPA and to Michigan a Form R for lead for calendar year 2004 by July 1, 2005.

26. Respondent submitted a Form R for lead to the Administrator of U.S. EPA and to Michigan on July 13, 2006 for calendar year 2004.

27. Respondent's failure to timely submit a Form R for lead to the Administrator of U.S. EPA and to Michigan for calendar year 2004 violated Section 313 of EPCRA, 42 U.S.C. § 11023, and 40 C.F.R. § 372.30.

Civil Penalty

28. Pursuant to Section 325 of EPCRA, 42 U.S.C. § 11045, Complainant determined that an appropriate civil penalty to settle this action is $3,836. In determining the penalty amount, Complainant considered the nature, circumstances, extent and gravity of the violations, and with respect to Respondent, its ability to pay, prior history of violations, economic benefit or savings resulting from the violations, and its agreement to perform a supplemental environmental project, and any other matters as justice may require. Complainant also considered U.S. EPA's *Enforcement Response Policy for Section 313 of the Emergency Planning and Community Right-to-Know Act (1986) and Section 6607 of the Pollution Prevention Act (1990) (amended)* (April 12, 2001). Respondent has the choice of three payment methods, as described below: payment by check, payment by debit or credit card, or payment by electronic funds transfer.

29. Within 30 days of the effective date of this CAFO, Respondent must pay a $3,836 civil penalty for the EPCRA violation.

30. Respondent must submit the civil penalty identified in paragraph 29 of this CAFO by using one of the three payment methods listed below:

a. If Respondent chooses to pay the penalty by check via standard U.S. mail, send a cashier's check or certified check, payable to "Treasurer, United States of America," to:

U.S. EPA – Region 5
P.O. Box 371531
Pittsburgh, PA 15251-7531

b. If Respondent chooses to pay the penalty by check via certified or overnight mail, send a cashier's check or certified check, payable to "Treasurer, United States of America," to:

Mellon Client Service Center
Attn: Shift Supervisor
Lockbox 371531
500 Ross Street
Pittsburgh, PA 15262 – 0001

c. If Respondent chooses to pay penalty by check, a transmittal letter, stating Respondent's name, the case title, Respondent's complete address, the case docket number, and the billing document number must accompany the payment. Respondent must send a copy of the check and transmittal letter to the following addressees:

Regional Hearing Clerk (E-13J)
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

David Star (DT-8J)
Pesticides and Toxics Compliance Section
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

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

d. If Respondent chooses to pay the penalty by check, the check must note the case title, the docket number of this CAFO, and the billing document number.

e. If Respondent chooses to pay the penalty online using an ACH debit or credit card, please visit www.pay.gov. Using the *Search Public Forms* option on the tool bar on the left side of the page, enter *SFO 1.1* in the search field. Open the form and complete the information requested.

f. If Respondent chooses to pay the penalty using an electronic funds transfer, make the transfer payable to "Treasurer, United States of America," and send it to:

Federal Reserve Bank of New York
ABA No. 021030004
Account No. 68010727
33 Liberty Street
New York, NY 10045
Field Tag 4200 of the Fedwire message should read:
"D 68010727 Environmental Protection Agency"

In the comment or description field of the electronic funds transfer, state the case title, the docket number of this CAFO and the billing document number.

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

32. If Respondent does not timely pay the civil penalty, or any stipulated penalties due under paragraph 39 of this CAFO, 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.

33. Pursuant to 31 C.F.R. § 901.9, Respondent must pay interest, penalty, and/or charges on any amount overdue under this CAFO. Interest will accrue on any amount overdue from the date the payment was due at a rate established pursuant to 31 U.S.C. § 3717. 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% per year penalty on any principal amount 90 days past due.

Supplemental Environmental Project

34. Respondent agrees to take the steps required in this CAFO to complete a Supplemental Environmental Project (SEP) to abate and/or mitigate lead-based paint hazards in selected residential housing units located in the Holland, Michigan area (the Selected Projects). The Selected Projects have been selected and will be monitored by the State of Michigan Department of Community Health, Lead and Healthy Homes Section (Michigan DCH), and completed by a qualified lead abatement contractor.

35. Within 30 days of receipt of the fully executed CAFO, Respondent will fund the Selected Projects in the amount of $11,509 (Respondent's SEP Funds). Respondent will complete and submit a SEP Completion Report to U.S. EPA following expenditure of

Respondent's SEP Funds on the Selected Projects. The SEP Completion Report shall include the following information:

a. The addresses at which the Selected Projects have been completed and the dates on which the work was completed;

b. The dates on which Michigan DCH disbursed all or part of Respondent's SEP Funds;

c. A summary of the work performed at each address, and the name and address of each contractor which performed the work; and

d. Documentation that clearance was conducted after such lead-based paint hazard abatement and/or mitigation activities were performed at each of the Selected Projects, to determine that the hazard abatement activities are complete and that no settled dust-lead hazards exist.

36. Respondent will procure from the Michigan DCH the information necessary to complete the SEP Completion Report within 30 days of completion of the last of the Selected Projects. Respondent agrees to provide a Status Report to U.S. EPA every 90 days from the effective date of this CAFO, until the SEP is complete and Respondent submits the Completion Report. Each SEP Status Report shall contain a report of the current status of each of the Selected Projects, the amount of money spent to date, and the anticipated completion date of each uncompleted Selected Project.

37. On or before June 30, 2008, Respondent will ensure that Michigan DCH completes each of the Selected Projects and has spent the entirety of Respondent's SEP Funds. If Michigan DCH has not completed each of the Selected Projects by June 30, 2008,

Respondent must provide U.S. EPA a verified statement, by August 1, 2008, that Michigan DCH has not completed each of the Selected Projects or to have spent the entirety of Respondent's SEP Funds.

38. Respondent certifies that it is not required to perform the SEP by any law, regulation, grant, order, or any other agreement, or as injunctive relief as of the date Respondent sign this CAFO. Respondent further certifies that it has not received, and is not negotiating to receive, credit for the SEP in any other enforcement action.

39. Respondent must submit copies of all documents or reports required by this CAFO to be submitted to U.S. EPA to David Star by first class mail at the address in paragraph 30(c) of this CAFO.

40. If Respondent violates requirements of this CAFO relating to the SEP, Respondent must pay stipulated penalties to the United States in addition to the $3,836 penalty described in paragraph 29 of this CAFO, as follows:

a. If Respondent fails to pay Michigan DCH Respondent's SEP Funds in full, in the time period specified in paragraph 35, Respondent agrees to pay the U.S. EPA a stipulated penalty of $100 for each day the full payment is overdue.

b. If Respondent fails to submit to U.S. EPA any document required by paragraphs 35 or 36 of this CAFO, Respondent must pay U.S. EPA a stipulated penalty of $50 for each day the document is overdue.

c. In no circumstance will Respondent pay stipulated penalties due to U.S. EPA under terms of this CAFO in an amount exceeding $12,000.

41. Respondent must pay any stipulated penalties within 15 days of receiving U.S. EPA's written demand for the penalties. All penalties shall begin to accrue on the first date of noncompliance, and shall continue to accrue through the date of completion. Respondent will use the one of the three methods of payment detailed in paragraph 30 of this CAFO, and will pay interest, handling charges, and nonpayment penalties on any overdue amounts.

42. Complainant will consider Respondent to have completed the terms of the SEP when Michigan DCH has fully expended Respondent's SEP Funds, when Respondent has paid any stipulated penalties that may be due under paragraph 40 of this CAFO, and when Respondent has ensured that U.S. EPA has received copies of the following documents:

a. The cancelled check for Respondent's SEP Funds;

b. Any necessary SEP Status Reports; and

c. The SEP Completion Report.

General Provisions

43. This CAFO resolves only Respondent's liability for federal civil penalties for the violations and facts alleged in the CAFO.

44. This CAFO does not affect the right of the U.S. EPA or the United States to pursue appropriate injunctive or other equitable relief or criminal sanctions for any violations of law.

45. This CAFO does not affect Respondent's responsibility to comply with EPCRA and other applicable federal, state, and local laws and regulations.

46. This CAFO is a *final order* for purposes of U.S. EPA's Enforcement Response Policy for Section 313 of EPCRA.

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

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

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

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

EBW Electronics, Inc., Respondent

9/14/07
Date

Cory Steeby, President
EBW Electronics, Inc.

United States Environmental Protection Agency, Region 5, Complainant

9/21/07
Date

Margaret M. Guerriero, Director
Land and Chemicals Division

EPCRA-05-2007-0036

2007 SEP 27 AM 11: 10
RECEIVED
REGIONAL HEARING CLERK
US EPA REGION V

In the Matter of:
EBW Electronics, Inc.
Docket No. EPCRA-05-2007-0036

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.

9/24/07
Date

Walter W. Karalek for
Mary A. Gade
Regional Administrator
United States Environmental Protection Agency
Region 5

2007 SEP 27 AM 11:10
RECEIVED
REGIONAL HEARING CLERK
US EPA REGION V

CERTIFICATE OF SERVICE

I hereby certify that the original signed copy of the Consent Agreement and Final Order in resolution of the civil administrative action involving EBW Electronics, Inc., was filed on September 27, 2007, with the Regional Hearing Clerk (E-13J), United States Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, Chicago, Illinois 60604-3590, and that I mailed by Certified Mail, Receipt No. 7001 0320 0006 0185 8344, a copy of the original to the Respondents:

Cory Steeby, President
EBW Electronics, Inc
13110 Ransom Street
Holland, MI 49424

and forwarded copies (intra-Agency) to:

Marcy Toney, Regional Judicial Officer, ORC/C-14J
Craig Melodia, Counsel for Complainant/C-14J
Eric Volck, Cincinnati Finance/MWD (w/Encl.)

Elizabeth Lytle

Elizabeth Lytle
Pesticides and Toxics Compliance Section
U.S. EPA - Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Docket No. **EPCRA-05-2007-0036**

RECEIVED
REGIONAL HEARING CLERK
US EPA REGION V
2007 SEP 27 AM 11:10

[Click here and type return address and phone and fax numbers]

HHS

Fax

To:	Tom Crosetto	**From:**	Steve M Smith
Fax:		**Pages:**	2
Phone:		**Date:**	7/2/2007
Re:	Holland projects	**CC:**	

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

Hi Tom

Please see the attached letter and let me know if you need anything further.

Thanks

Steve M. Smith

(616) 240-3926

STATE OF MICHIGAN
DEPARTMENT OF COMMUNITY HEALTH
LANSING

JENNIFER M. GRANHOLM
GOVERNOR

JANET OLSZEWSKI
DIRECTOR

July 2, 2007

Mr. Tom Crosetto
US EPA Mail Stop DT-8J
77 W Jackson Blvd
Chicago, Ill 60604

Regarding – Projects in Holland

Dear Tom:

This letter is in response to our previous conversations regarding the Holland, Michigan projects. I currently have the following three projects lined up for funding through your settlement mandate:

1. – 39 W 19th St. Holland, MI 49423
   a. This home is occupied by a family of 4 with two young children. The oldest child has an EBL of 4 mg/dl by venous draw. The youngest child is newborn and has not been tested. This project originated with Ottawa County Community Action Agency. They requested $2,500 from our program to make the project viable as project costs exceeded their allowable assistance levels. This project is not eligible for our HUD program because the child's EBL level is not 10mg/dl or higher. We recommended them to your settlement offer. At this time the project is nearly completed and all lead hazards have been remediated. This contractor is ready for payment of the $2,500
2. – 194 W 13th St., Holland, MI. 49423
   a. This home is occupied by a large family. There is a child residing at this home with an EBL of 10 mg/dl or higher. No work has yet been performed but lead based paint hazards as identified in my Lead Based Paint Risk Assessment are estimated to cost between $10,000 and $15,000. Because this project is eligible for our HUD program we wish to blend $4,500 of your settlement funds with approximately $10,000 from our HUD grant to complete the work at this address. By blending funds we are able to complete additional projects. Bids on this project will be let sometime in early August.
3. – 210 W 16th St., Holland, MI. 49423
   a. This home is occupied by a family of 5. The family consists of a grandmother who is the property owner and her daughter who has three children. One child tested high for EBL's. A Risk Assessment is scheduled to be performed at this home. The home is in very good

condition and lead related costs are not expected to exceed $6,000. This project would also be a blend of our HUD funds with EPA settlement funds.

The files on these projects are available to you upon request. Each file will have a Risk Assessment report indicating the presence and severity of lead hazards. Each family being assisted meets HUD income guidelines of either low income (less than 50% of median) or moderate income (less than 80% of area median income). These projects will be monitored by the State of Michigan Department of Community Health, Lead and Healthy Homes Section. Additionally, only qualified lead abatement contractors are allowed to bid the projects.

These projects are moving forward. The project at 39 W 19th is nearly completed. I apologize for my misunderstanding that the settlement funds were not yet available. If I can be of further assistance or if additional information is needed please do not hesitate to contact me. Please be advised that I will be out of the office from July 16th through Aug. 3rd.

Sincerely,

Steve M. Smith

Cc – Mr. Wes Priem, Mrs. Carin Speidel

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

REPLY TO THE ATTENTION OF: DT-8J

March 6, 2007

MEMORANDUM

SUBJECT: Penalty Calculation Worksheet for EBW Electronics, Inc., Holland, Michigan

FROM: Tom Crosetto

TO: File

On April 4, 2006, Region 5 inspector John Myhre inspected the EBW Electronics facility located at 13110 Ransom Street, Holland, Michigan 49424 to determine its compliance with EPCRA TRI rules for the facility's activities during calendar year 2004. During 2004 and in prior years back to and including 2001, the facility was located at 701 Commerce Court, Holland, Michigan, and moved to its present location in early 2005. During the relevant time, the facility put electrical components into preprinted circuit boards and soldered them in place, operations which are described by SIC code 3679. According to the company, the Commerce Court facility had 25 employees during calendar year 2004 and total sales of $5.8 million.

The inspector determined that EBW's Commerce Court facility processed 1,403 pounds of lead (CASRN 7439-92-1) during calendar year 2004. The lead was contained in tin-lead solder that EBW used to solder the electrical components to printed circuit boards it purchased. Lead is a toxic chemical of special concern under EPCRA 313, and has a reporting threshold of 100 pounds per year for manufacturing, processing and otherwise use activities. Thus, given that EBW had 10 or more full-time-equivalent employees and was operating in a reportable SIC code at its Commerce Court facility during calendar year 2004, its processing of 1,403 pounds of lead at the Commerce Court facility during calendar year 2004 must be reported to the EPA and State of Michigan on TRI Form R. EBW submitted the TRI Form R for lead to U.S. EPA and the State of Michigan on July 13, 2006, which is more than one year after the deadline of July 1, 2005.

The calculation of the penalty for late submission of lead for reporting year 2004 for the Commerce Court facility is as follows:

Toxic Chemical	Reporting Year	Category level	Circumstance level	Extent Level	Days Late	Penalty
Lead	2004	I	1	B	>1 year	$21,922

Cory Steeby
<csteeby@ebw-electronics.com>
01/12/2007 09:17 AM

To

Subject RE: TRI reporting for lead

Hello Tom:

Here is the information you were looking for:

at 701 Commerce CT

2001	1458 pounds of lead
	27 employees
2002	1307 pounds of lead
	27 employees
2003	1046 pounds of lead
	26 employees

at 13110 Ransom ST

2005	1496 pounds of lead
	34 employees

3679 is the correct SIC code.

Please let me know if you need any additional information.

Kind Regards,
Cory Steeby
president
EBW Electronics, Inc.
616 786 0575 x14

-----Original Message-----
From: Crosetto.Thomas@epamail.epa.gov
[mailto:Crosetto.Thomas@epamail.epa.gov]
Sent: Tuesday, December 19, 2006 6:30 PM
To: csteeby@ebw-electronics.com
Subject: TRI reporting for lead

Hi Cory. The information I am looking for is the quantity of lead EBW processed during calendar years 2001, 2002, 2003 at the Commerce Court facility, and during 2005 at the Ransom Street facility; the primary SIC code of the facilities during those years (I presume it was 3679, but please confirm this); and the number of full-time equivalent employees the EBW had during each of those years. An approximation of the number of employes is acceptable. One full-time equivalent employee represents 2,000 work hours. You can provide this information by postal mail or e-mail, whichever you prefer. If you can provide this information to me by January 12, 2007, that would be fine.

Please contact me if you have any questions. Thanks.

Thomas J. Crosetto
Environmental Scientist
Pesticides and Toxics Branch
Region 5
U.S. Environmental Protection Agency
mail code DT-8J

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

MAR 1 2 2007

REPLY TO THE ATTENTION OF:
DT-8J

CERTIFIED MAIL
RECEIPT NO. 7001 0320 0006 0177 9908

James Cory Steeby
Registered Agent for EBW Electronics, Inc.
13110 Ransom Street
Holland, Michigan 49424

Re: Notice of Intent to File Civil Administrative Complaint

Dear Mr. Steeby:

I hereby notify you that the United States Environmental Protection Agency (U.S. EPA), Region 5, plans to file a Civil Administrative Complaint for civil penalties against EBW Electronics, Inc. (EBW). Based on information a U.S. EPA inspector gathered during an inspection of the EBW facility located at 13110 Ransom Street, Holland, Michigan 49424 (Holland Facility), on April 4, 2006, U.S. EPA has determined that EBW has committed one violation of Section 313 of the Emergency Planning and Community Right-to-Know Act (EPCRA), 42 U.S.C. § 11023.

Specifically, the complaint will allege that during calendar year 2004, EBW processed lead (Chemical Abstracts Service Registry Number 7439-92-1) in excess of 100 pounds at its facility, but that it did not submit its EPCRA TRI Form R for this chemical to U.S. EPA or the State of Michigan until July 13, 2006. Such submission was more than one year late, and late submission of a TRI Form R constitutes a violation of Section 313 of EPCRA, 42 U.S.C. § 11023, and 40 C.F.R. § 372.30. Based on information currently available to us, U.S. EPA will propose a penalty of $21,900 for this violation. However, please note the following information.

This letter is not a demand to pay a penalty. We will not ask EBW to pay a penalty until we file the Complaint or a Final Order. Instead, the purpose of this letter is to give EBW the opportunity to present any information that it believes U.S. EPA should consider before we file the Complaint. Relevant information might include evidence that EBW did not violate the law; evidence that EBW relied on compliance assistance from U.S. EPA or a state agency; evidence that we have identified the wrong party as the violator; or financial data indicating that EBW would be unable to pay a penalty in this amount.

If EBW believes it is unable to pay a $21,900 penalty and remain in business, please submit true, accurate and complete copies of the following documents: (1) signed and filed EBW U.S. income tax returns, including all schedules, forms, balance sheets, and other attachments, for the most

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on 100% Recycled Paper (50% Postconsumer)

recent five years; (2) EBW financial statements, preferably audited, including all balance sheets, income statements, statements of operations, statements of retained earnings, statements of cash flows, and all notes to each financial statement, for the most recent five years; and (3) all EBW asset depreciation schedules, cumulative for the most recent five years. If this information demonstrates that EBW cannot pay a $21,900 penalty and remain in business, U.S. EPA will adjust the penalty downward to an appropriate amount prior to issuance of the Complaint. Please note that financial information is only required if EBW wishes to assert that it cannot pay a penalty of $21,900.

Any information that EBW submits in response to this notice is not subject to the Paperwork Reduction Act, 44 U.S.C. §§ 3501 *et seq.*, because this notice seeks collection of information from specific individuals or entities as part of an administrative action or investigation. We may use any information EBW submits in response to this letter in support of an administrative, civil, or criminal action.

EBW may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B, for any or all of the information it submits to us which is in fact confidential to its business. Information that EBW claims to be business confidential is available to the public only to the extent allowed by 40 C.F.R. Part 2, Subpart B. U.S. EPA may make any information for which EBW does not assert a business confidentiality claim available to the public upon request and without notice to EBW.

Within ten calendar days after you receive this letter, please respond with all relevant information to Attorney Jacqueline Miller (C-14J), U.S. EPA, 77 West Jackson Boulevard, Chicago, Illinois 60604. We intend to file the Complaint against EBW 14 calendar days after you receive this letter, unless EBW gives us information indicating that the Complaint is not justified.

If you have any questions, please telephone Thomas J. Crosetto, Environmental Scientist, at 312-886-6294. Thank you for your prompt attention to this matter.

Sincerely,

Mardi Klevs

Mardi Klevs, Chief
Pesticides and Toxics Branch

FOIA EXEMPT--INTERNAL DELIBERATIONS

TITLE III SECTION 313 INSPECTION

COMPANY:

EBW Electronics
13110 Ransom Street
Holland, MI 49424

DATE OF INSPECTION: April 4, 2006

FINDINGS AND CONCLUSIONS: 1403 fm/30 Nov 06

It appears that the facility is not in compliance with the Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA), 42 U.S.C. § 11001 et seq. The facility processed a total of ~~1406~~ lbs of lead (CAS Number 7439-92-1) in Calendar Year 2004. This quantity is in excess of the reporting threshold. The facility failed to file a Form R with US EPA for lead for calendar year 2004.

INSPECTOR:
John D. Myhre, DT-8J

John Myhre 30 Aug 2006

EXPERT REVIEWER:

27 Sep 06

ENFORCEMENT
CONFIDENTIAL
INFORMATION

CORPORATE ENTITY DETAILS

Searched for: EBW ELECTRONICS, INC.

ID Num: 333976
Entity Name: EBW ELECTRONICS, INC.
Type of Entity: Domestic Profit Corporation
Resident Agent: JAMES CORY STEEBY
Registered Office Address: 13110 RANSOM STREET HOLLAND MI 49424
Mailing Address: MI

Formed Under Act Number(s): 284-1972

Incorporation/Qualification Date: 8-25-1992
Jurisdiction of Origin: MICHIGAN

Number of Shares: 60,000

Year of Most Recent Annual Report: 06
Year of Most Recent Annual Report With Officers & Directors: 06
Status: ACTIVE **Date:** Present

View Document Images

Return to Search Results New Search

Copyright © 2001-2006 State of Michigan

Document List | New Search | Help Menu

[illegible]

DEPARTMENT OF LABOR & ECONOMIC GROWTH
BUREAU OF COMMERCIAL SERVICES, CORPORATION DIVISION
PROFIT CORPORATION INFORMATION UPDATE
2006

[X] On behalf of the Corporation, I certify that no changes have occurred in required information since the last filed annual report.

Entity Information

Identification Number	Corporation Name
333976	LOW ELECTRONICS, INC.

Resident agent name and mailing address of the registered office

JAMES CORY STEEBY

The address of the registered office

13110 RANSOM STREET

HOLLAND MI 49424

Describe the purpose and activities of the corporation during the year covered by this report.

Officer/Director Information

NAME	TITLE	BUSINESS OR RESIDENCE ADDRESS
JAMES C STEEBY	PRESIDENT	13110 RANSOM STREET HOLLAND MI 49424
JAMES C STEEBY	SECRETARY	13110 RANSOM STREET HOLLAND MI 49424
LUANNE COOK	TREASURER	13110 RANSOM STREET HOLLAND MI 49424

Electronic Signature

Filed By	Title	Phone
LUANNE COOK	AUTHORIZED OFFICER OR AGENT	616-706-0575

[X] I certify that this filing is submitted without fraudulent intent and that I am authorized by the business entity to make any changes reported herein.

Payment Information

Payment Amount	Payment Date/Time	Reference Nbr
$25.00	04/03/06 14:39:49	71315 6801 333976

Company Details

Lookup Results
Contact Names

Site Info:

DUNS Number:	799673603
Business Name:	Ebw Electronics, Inc
Tradestyle:	
Physical Street Address:	13110 Ransom St
Physical City:	Holland
County:	OTTAWA
Physical State Abbreviation:	MI
Physical Zip:	49424
Mailing Address:	13110 Ransom St
Mailing City:	Holland
Mailing State:	MI
Mailing Zip:	494248715
Telephone Number:	616-399-0261
Primary 8 Digit SIC Code:	36790100
Primary SIC8 Description:	ELECTRONIC CIRCUITS
Primary NAICS Code:	334419
Primary NAICS Description:	334419-Otr Electr Component Mfg
CEO Name:	James Cory Steeby
CEO Title:	President

Business Size:

Employees Here:	28
Employees Total:	28
Sales Volume (US$):	$5,877,287

Enterprise:

Global Ultimate Duns Number:	799673603
Headquarters Duns Number:	
Parent Duns Number:	

Organization:

Ownership:	PRIVATE COMPANY
Location Type:	SINGLE
Latitude:	42.848245
Longitude:	-86.104456

© 2006 D&B Version 2.3.0

EBW —

20 Cars

4 april

(Contacted earlier by Maynard Shah)

J. Cory Steele, president

701 Commerce Court in 2004

10,000 ft² - 1 Bldg

Naics

~~335~~ 335311 3344188

current code

25 employees in 2004 @ 701

SBA - not done -

no parent company.

no other properties -
property owned by
EBWE properties LLC

corporate income - 2004
$ 5,800,000

No 304 spills -

No 311, 312 reporting -
possibly ~~does~~ doesn't apply
no knowledge.

Water - No

air - NO

RCRA - don't know -
will check

PCB assembly —

~60% contract assembly
~20% mix
~20% Ballasts - fluorescent

Moved — started work in 2005 —
Moved wave solder machine
in 2004 — fired up in 2005

Ransom st - 15,000 ft²
32 employees $7,600,000

$\boxed{\text{3 SMT Lines}}$ - 12 stations each

6 th. stations

board ⇒ or pot
or waste rags) recycle

adhesive to bond parts to board

separate test area ± rework
~~goes into recycler~~ bin

dead boards + cutoffs go for recycle,

check MSDS

Refrigerators — use Do Loctite 3609
+ 444 - limited use

Kester Easy Profile 256 — solder paste

(plus samples from Loctite)

Through Hole – hand inserted

Dross on floor + in bucket

Bar solder from Kester

on box "SN63 PB 37 ULD Bar 1 2/3 lb"

on bar "Sn63 Pb37"

Roll solder – Kester 1 lb –

Sn63Pb37 – .015 to .031

EBW ELECTRONICS
Design, engineering, and manufacturing of electronic products

J. Cory Steeby
President

13110 Ransom Street • Holland, Michigan 49424
www.ebw-electronics.com • csteeby@ebw-electronics.com
800 787 0575 toll-free • 616 786 0575 phone • 616 786 0513 fax

Discussed MSDS sheets —
filling out the form R

~~on~~ emission factors for lead —
how to file w/state

How to re-order — Kanban System

Receipts ~~reqed~~ signed

EBW Electronics

616-786-0575

2:20 pm, 6 March —

Could not get beyond ~~ans~~ initial answering service!

Mark Fluga, Director of sales

3:30 pm

(found by ~~far~~ first name search) + Research USA)

note per internet: President is Cory Steeby

8:03 AM, 7 March
616-786-0575
"THERESA" - called back, said to call back

I called Theresa (8:45)
"Theresa Bennett" —
should talk to president:
Cory Steeby X 14
in mtg - will have him call

Call from 1:25
Mark Fluga
616-786-0068 X23

EBW p.2

I called EBW

616-786-0068 x23

7 March 1:30

Mark Fluga

35 empl

do mfr

Components added to PC —

need information ~~of~~ on solder consumption — will be getting back to me on approximate amount.

1:35 - called back to remind him that he needed ALL ~~#~~ consumption by the facility — all sister companies

---

1:50 called by Cory Stebly (president)

Told how to report for ~~2006~~ 2005

→ had been contacted by someone else at EPA —

"Maynard ~~Shah~~ Shaw".

gave ten notice of tentative inspection — will get back to me!

9 March
1:30 pm - called Cory STEEBE -
asked (via voice mail) where the results were?

10 March 2006 - called me
2004 - Lead - 1400 lbs

recycled 1062

Cory Steeby - President
EBW Electronics INC
13110 Ransom St.
Holland, MI 49424
Re-stated notice of impending inspection -
Close April 4 - 9:00

13 March 2006 -
asked about facility ~~[illegible]~~ usages -
old @ 701 Commerce Court
new @ 13110 Ransom Street

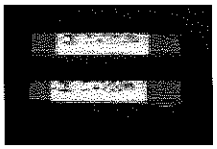
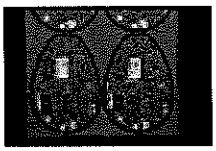
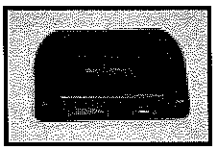
EBW ELECTRONICS

Design, Engineering, and Manufacture of Electronic Ballast & Contract Assemblies

Creative Solutions for Electronic Ballast Applications

Quality PCB Assembly Capabilities

Electronic ballast & PCB assembly manufacturer EBW-Electronics Incorporated offers specialized manufacturing solutions with a wide range of development and manufacturing capabilities.

-- Select to Jump --

- Lamp Ballast
- PCB Assembly
- News Article
- New Facility
- Quality
- OEM Ballast
- MRO Ballast
- Products
- RMA Services

EBW Electronics provides services ranging from printed circuit board assembly to the manufacture of Electronics fluorescent lamp ballast and turnkey contract manufacturing solutions for a diverse custom base. A select clientele of outside customers and EBW Electronics sister companies worldwide rely or EBW Electronics Engineering Design Center for its broad range of knowledge-based supporting expe improve their performance, lower their costs and to create new business opportunities.

EBW Electronics Contract Manufacturing Services offer flexible tailor-made solutions for industrial clie based on a full range of manufacturing services. With more than 15 years of experience in the electro business, its expertise encompasses design and product development, mass manufacturing, new pro introduction and process engineering, supply chain services and continuous quality improvement.

EBW Electronics is currently one of the fastest growing PCB contract manufacturing and design comp in the Midwest due to the tremendous support from their satisfied customers and the resulting new bu Contact EBW Electronics today and experience the exhilaration of working with a world class partner ebwe@ebw-electronics.com .

Significant Growth Requires New Facility December 2004

Record growth in 2003 & 2004 has resulted in the need to expand our facility and capabilitie While many manufacturers have been experiencing stagnant markets, EBW Electronics has partnered with their customer base with creative solutions that helped customers be more successful. Innovative partnership business models have allowed us to achieve synergy wit customers leading to a stronger presence in their industries. Please visit our new facility onl

Search the Web for: go

Use Advanced Search

Flexible Support Systems

add to favorites

VISA eCheck

On-Line Ordering

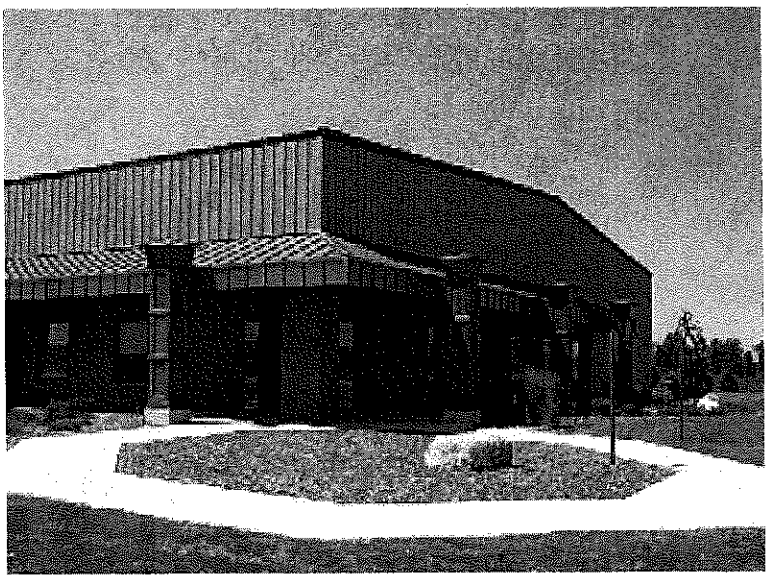
EBW ELECTRONICS

Design, Engineering, and Manufacture of Electronic Ballast & Contract Assemblies

Significant Growth Requires New Facility

Record growth in 2003 & 2004 has resulted in the need to expand our facility and capabilities. While many manufacturers have been experiencing stagnant markets, EBW Electronics has partnered with their customer base with creative solutions that helped customers be more successful. Innovative partnership business models have allowed us to achieve synergy with our customers leading to a stronger presence in their industries.

Moved in December 2004



13110 Ransom Street **Holland, MI 49424**

ebwe@ebw-electronics.com

EBW ELECTRONICS

Design, Engineering, and Manufacture of Electronic Ballast & Contract Assemblies

Contact

Contact Information

Telephone

616-786-0575
800-787-0575

FAX

616-786-0513

Postal address

EBW Electronics, Inc.
13110 Ransom Street
Holland, MI 49424

Electronic mail

General Information: ebwe@ebw-electronics.com
Sales: Sales@ebw-electronics.com
Customer Support: support@ebw-electronics.com
Webmaster: webmaster@ebw-electronics.com

msn

Search the Web for:

go

Use Advanced Search

add to favorites

email us

EBW ELECTRONICS

Design, Engineering, and Manufacture of Electronic Ballast & Contract Assemblies

News Article

Read about the Manufacturing Matters to Michigan Initiative

MiBiz.com Where Michigan Business Clicks.

Growth prompts EBW Electronics' move to HEDCOR industrial park

Monday, December 27, 2004 - MiBizWest

By Karen Gentry
MiBiz Network

-- Select to Jump --

Lamp Ballast
PCB Assembly
News Article
New Facility
Quality
OEM Ballast
MRO Ballast
Products
RMA Services

HOLLAND — Record growth in 2003 and 2004 for EBW Electronics has resulted in the company's move t a new 18,000-square-feet building, double the size of the company's old facility.

EBW Electronics is a privately held and locally owned company founded by Leo LeBlanc. The company started supplying the office furniture industry before expanding to automotive and industrial original equipment manufacturer clients. The workforce at EBW Electronics has jumped from two in 1992 to 28 employees, many of them computer machine operators and general assembly workers.

The manufacturer of printed circuit boards, turnkey assemblies and fluorescent ballast has moved into the HEDCOR (Holland Economic Development Corporation) industrial park on Ransom Street in Holland Charter Township.

EBW Electronics' new facility includes a large, one-room layout that will be much more efficient for manufacturing, according to Cory Steeby, EBW President Cory Steeby. The state-of-the-art facility for electronics manufacturing will include an ESD conductive tile floor that helps control static.

Diversification and more business with both established customers and new customers have fueled the company's "pretty nice growth" over the past several years, Steeby said. Engineering and design services offered to its range of office furniture, automotive and industrial clients — including about 12 substantial clients — have lifted the company. "Our experience in West Michigan has been very good."

msn

Search the Web for: go

Use Advanced Search

add to favorites

Company success can be attributed to a customer focus and being very cost conscious, Steeby stated. The company is unique in its industry in that engineering services are offered to support a customer's product development efforts. This can result in higher quality, better designs and products that are easier to manufacture. The company also has its own proprietary products such as fluorescent ballast for the lighting industry.

EBW Director of Sales Mark Fluga said the company's business model establishes a "virtual division." Through the model EBW Electronics doesn't just serve as a supplier, but as a partner with its clients. Clients have more control over quality and the design process. Giving clients access and participation in engineerin support, material costs, and shared cost models that are agreed to jointly, results in more profits for custome according to Fluga.

3 May
2:22 pm

Corex EBW – Letter?

616-786-0575

---

called Back – left message –
3:35

I said nothing no letter was forthcoming,
& that he should send the information
requested in the receipt for samples & documents.

Called by Corey – [X 14]
19 June 2006 12:40pm –

asked why the letter – he was
waiting for the letter describing what
he should send.

I referred him to my oral conversation

The company has been in business for 12 years and has always been located in Holland Township. The company will take the tax abatements they have received from Holland Charter Township to the new location. Steeby said EBW wanted to remain in the Holland area in part because of its good employee base.

COPYRIGHT 2005. MIBIZ NETWORK. ALL RIGHTS RESERVED.

This article appeared in the Monday December 27th, 2004 issue of MiBiz, read by upper manag executives in West and Southwest Michigan. Print subscriptions are free to qualified individuals business in West and Southwest Michigan. For further information about MiBiz Network, visit www.mibiz.com.

PLEASE NOTE: Since MiBiz Network retains the copyright for the article, it must be published A: with no revisions unless you receive permission from the publisher.

Copyright © 2005 MiBiz®. All Rights Reserved.

email us

Back Home Next

Back Home Next

email us

Next

FTTS TRACKING SYSTEM
INPUT DOCUMENT FOR SITE & INSPECTION RECORD

FILE NO:	06EP139	EXT:		**LEGISLATION:**	E	INITIAL DATE:

SITE/FACILITY NAME: EBW Electronics

SITE/FACILITY ADDRESS: 13110 Ransom St

SITE CITY: Holland **STATE:** MI **SITE COUNTY:** Ottawa

SITE ZIP: 49424 FACILITY FUNCTION: MN

PARENT COMPANY INFORMATION

PARENT NAME:

PARENT ADDRESS:

PARENT CITY: PARENT STATE: ZIP:

FOREIGN:

ENTERED HQ							
ENTERED REGION							

INSPECTION RECORD

INSPECTION DATE: April 4, 2006 INSPECTOR NUMBER: FEP57 SEQ: 01

LEGISLATIVE IND: E INVESTIGATION TYPE EEA

REGION or STATE: 5 INSPECTOR'S NAME: John D. Myhre

REASON FOR INSPECTION NSR REFERRAL TYPE WARRANT REQ? NO. OF SAMPLES:

NO. OF SCHOOLS INSPECTED SCHOOL TYPE: NO. OF SCHOOLS IN LEA:

REMARKS:

RETURN TO:	Myhre						
ENTERED HQ:	[illegible]						
ENTERED REGION:	[illegible] 4/11-6						

This envelope is for use with the following services:

visit **UPS.com®**.

PAM KIRBY
(616) 786-0575
EBW ELECTRONICS, INC.
13110 RANSOM STREET
HOLLAND MI 49424

LTR 1 OF 1

RECEIVED
JUL 17 2006
PESTICIDES & TOXICS BRANCH
Waste Pesticides & Toxics Division
U.S. EPA Region 5

SHIP TO:
MR. JOHN D. MYHRE (DT-8J)
USEPA, REGION 5
77 WEST JACKSON BLVD
CHICAGO IL 60604-3590

IL 606 9-08

UPS NEXT DAY AIR SAVER 1P

TRACKING #: 1Z 39E 718 13 4861 2130

BILLING: P/P

UOW 8.0.16 UPS Thermal 2 54 0A 04/2006

International Shipping Notice - Carriage hereunder may be subject to the rules relating to liability and other terms and/or conditions established by the Convention for the Unification of Certain Rules Relating to International Carriage by Air (the "Warsaw Convention") and/or the Convention on the Contract for the International Carriage of Goods by Road (the "CMR Convention"). These commodities, technology or software were exported from the U.S. in accordance with the Export Administration Regulations. Diversion contrary to U.S. law prohibited. For stopping places, call 1-800-782-7892. United Parcel Service, Louisville, KY

ability and other terms and/or conditions established by the Convention for the Unification of Certain Rules Relating to International
technology or software were exported from the U.S. in accordance with the Export Administration Regul

EBW ELECTRONICS

Design, engineering, and manufacturing of electronic products

EBW Electronics, Inc.
13110 Ransom ST
Holland, MI 49424

RECEIVED
JUL 17 2006
PESTICIDES & TOXICS BRANCH
Waste Pesticides & Toxics Division
U.S. EPA - REGION 5

July 14, 2006

Mr. John D. Myhre
United States Environmental Protection Agency
Region 5, DT-8J
77 West Jackson BLVD
Chicago IL 60604-3590

Hello John:

Enclosed are paper copies of RY2001 through RY2005 submittals to both the EPA and the State of Michigan.

Please let me know if there is any further information you require and I will gladly furnish it.

Kind Regards,

Cory Steeby
President

cc: Mr. John Myhre

EBW ELECTRONICS

Design, engineering, and manufacturing of electronic products

EBW Electronics, Inc.
13110 Ransom ST
Holland, MI 49424

July 13, 2006

TRI Data Processing Center
C/o Computer Sciences Corporation
Suite 300
8400 Corporate Drive
Landover MD 20785

To Whom It May Concern:

Enclosed with this cover letter is a CD containing TRI data for Reporting years 2001 through 2004 along with the signature certification letters for those same years. It became known to EBW Electronics, Inc. earlier this year that this data should have been sent to the EPA starting in 2002 with data from 2001. This filing is to bring EBW Electronics reporting up to date with the requirements. Our 2006 filing for RY2005 was reported per the July 1 deadline, and thus is not included in this submittal. We have accomplished this task through direction of Mr. John Myrhe, Multi-Program Inspector, Waste, Pesticides, & Toxics Enforcement Section.

It is the hope of EBW Electronics, Inc. that there will not be monetary penalties associated with our late filings. We trust that our cooperation and our bringing the filings up to date voluntarily will serve as evidence that the lack of filing was not intentional. Indeed EBW Electronics was unaware of our filing requirement until early this year through Mr Myhre. EBW Electronics is a small business and penalties would do significant damage to our business.

Kind Regards,

Cory Steeby
President

cc: Mr. John Myhre

13110 Ransom Street • Holland, Michigan 49424 • www.ebw-electronics.com
800 787 0575 toll-free • 616 786 0575 phone • 616 786 0513 fax

EBW ELECTRONICS

Design, engineering, and manufacturing of electronic products

EBW Electronics, Inc.
13110 Ransom ST
Holland, MI 49424

July 13, 2006

Robert Jackson
State Emergency Planning Community Right-to-Know
Michigan Department of Environmental Quality
Environmental Science and Services Division
PO Box 30457
Lansing MI 48909

To Whom It May Concern:

Enclosed with this cover letter is a CD containing TRI data for Reporting years 2001 through 2004 along with the signature certification letters for those same years. It became known to EBW Electronics, Inc. earlier this year that this data should have been sent to the EPA starting in 2002 with data from 2001. This filing is to bring EBW Electronics reporting up to date with the requirements. Our 2006 filing for RY2005 was reported per the July 1 deadline, and thus is not included in this submittal. We have accomplished this task through direction of Mr. John Myrhe, Multi-Program Inspector, Waste, Pesticides, & Toxics Enforcement Section.

It is the hope of EBW Electronics, Inc. that there will not be monetary penalties associated with our late filings. We trust that our cooperation and our bringing the filings up to date voluntarily will serve as evidence that the lack of filing was not intentional. Indeed EBW Electronics was unaware of our filing requirement until early this year through Mr Myhre. EBW Electronics is a small business and penalties would do significant damage to our business.

Kind Regards,

Cory Steeby
President

cc: Mr. John Myhre

13110 Ransom Street • Holland, Michigan 49424 • www.ebw-electronics.com
800 787 0575 toll-free • 616 786 0575 phone • 616 786 0513 fax

EBW ELECTRONICS

Design, engineering, and manufacturing of electronic products

EBW Electronics, Inc.
13110 Ransom ST
Holland, MI 49424

July 13, 2006

TRI Data Processing Center
C/o Computer Sciences Corporation
Suite 300
8400 Corporate Drive
Landover MD 20785

To Whom It May Concern:

Enclosed with this cover letter is a CD containing TRI data for Reporting years 2001 through 2004 along with the signature certification letters for those same years. It became known to EBW Electronics, Inc. earlier this year that this data should have been sent to the EPA starting in 2002 with data from 2001. This filing is to bring EBW Electronics reporting up to date with the requirements. Our 2006 filing for RY2005 was reported per the July 1 deadline, and thus is not included in this submittal. We have accomplished this task through direction of Mr. John Myrhe, Multi-Program Inspector, Waste, Pesticides, & Toxics Enforcement Section.

It is the hope of EBW Electronics, Inc. that there will not be monetary penalties associated with our late filings. We trust that our cooperation and our bringing the filings up to date voluntarily will serve as evidence that the lack of filing was not intentional. Indeed EBW Electronics was unaware of our filing requirement until early this year through Mr Myhre. EBW Electronics is a small business and penalties would do significant damage to our business.

Kind Regards,

Cory Steeby
President

cc: Mr. John Myhre

13110 Ransom Street • Holland, Michigan 49424 • www.ebw-electronics.com
800 787 0575 toll-free • 616 786 0575 phone • 616 786 0513 fax

Signature Certification for U.S. EPA Diskette Submission

DISK

EBW ELECTRONICS, INC.
701 COMMERCE CT
HOLLAND, MI 49424
NEW FACILITY

July 13, 2006

TRI Data Processing Center
c/o Computer Sciences Corportation
Suite 300
8400 Corporate Drive
Landover, MD 20785

(301) 429-5005

To Whom It May Concern:

Enclosed please find one (1) microcomputer diskette containing toxic chemical release reporting information for:

EBW ELECTRONICS, INC.

This information is submitted as required under section 313 of the Emergency Planning and Community Right-to-Know Act of 1986 and the Pollution Prevention Act of 1990.

We are submitting a total of 1 chemical report(s) for our facility.

These 1 chemical report(s) are described below:

TRI Chemical or Chemical Category	Reporting Year	CAS Number	Report
Lead	2004	7439-92-1	Form R

Our technical point of contact is:

J CORY STEEBY
(616) 786-0575
CSTEEBY@EBW-ELECTRONICS.COM

and is available should any questions or problems arise in the processing of this diskette.

If the enclosed diskette contains one or more Form R chemicals, then I hereby certify that I have reviewed the enclosed documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report(s) are accurate based on reasonable estimates using data available to the preparers of this report(s).

If the enclosed diskette contains one or more Form A chemicals, then I hereby certify that to the best of my knowledge and belief, for each toxic chemical listed in the Form A statement, the annual reportable amount as defined in 40 CFR 372.27(a) did not exceed 500 pounds for this reporting year and that the chemical was manufactured, processed or otherwise used in an amount not exceeding 1 million pounds during the reporting year.

Sincerely,

J CORY STEEBY
PRESIDENT

Enclosure: Diskette

State Diskette

Submission Checklist

	PLEASE CHECK AND COMPLETE EACH STEP BELOW:	**Complete?**
1.	The submission diskette is a new diskette. Older diskettes (for example, "recycled" diskettes) have caused upload problems in the past.	☐
2.	The diskette is a 3.5" high-density (1.44 MB) Windows-compatible diskette.	☐
3.	The diskette contains only files created by TRI-ME. Any other files on the diskette may cause the entire diskette to be rejected during the upload process into the Toxics Release Inventory System (TRIS).	☐
4.	The diskette has been virus-checked and it is virus free.	☐
5.	Attach a label to each diskette. The label should be in the following format:	☐

TRIS Report
(Your Company Name)

Date:	07-01-2005
Density:	HD
Report Year:	2004
Number:	1 of 1
Contact:	(Technical Contact Name) (Technical Contact Phone)

6.	**The certification letter is signed by a senior management official per EPCRA section 313(g)(1)(B).**	☐
7.	Use the correct address:	☐

Overnight Mail

Robert Jackson
MDEQ ESSD
Constitution Hall, 1 North
525 West Allegan
Lansing, MI 48933

All Other Submissions

Robert Jackson
State Emergency Planning and Community
Right-to-Know
Michigan Department of Environmental
Quality
Environmental Science and Services Division
P.O. Box 30457
Lansing, MI 48909
(517) 373-8481; Fax: (517) 241-7966

8.	**The envelope contains only the submission diskette and the signed certification letter. (Do not send paper forms with a diskette submission.)**	☐
9.	**The signed certification letter and diskette must be postmarked and mailed on or before July 1, 2005.**	☐

(IMPORTANT: Type or print; read instructions before completing form)

File Copy -- Do Not Submit to EPA

EPA United States Environmental Protection Agency

FORM R

Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986, also known as Title III of the Superfund Amendments and Reauthorization Act

TRI Facility ID Number	
New Facility	
Toxic Chemical, Category or Generic Name	Lead

WHERE TO SEND COMPLETED FORMS: 1. TRI Data Processing Center, P.O.Box 1513, Lanham, MD 20703-1513 2. APPROPRIATE STATE OFFICE (See instructions in Appendix F)

Enter "X" here if this is a revision: [ ]

For EPA use only

Important: See instructions to determine when "Not Applicable (NA)" boxes should be checked.

PART I. FACILITY IDENTIFICATION INFORMATION

SECTION 1. REPORTING YEAR 2004

SECTION 2. TRADE SECRET INFORMATION

2.1	Are you claiming the toxic chemical identified on page 2 trade secret? [ ] Yes (Answer question 2.2; Attach substantiation forms) [X] NO (Do not answer 2.2; Go to Section 3)	2.2	Is this copy [ ] Sanitized [ ] Unsanitized (Answer only if "YES" in 2.1)

SECTION 3. CERTIFICATION (Important: Read and sign after completing all form sections.)

I hereby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data available to the preparers of this report.

Name and official title of owner/operator or senior management official:	Signature:	Date Signed:
J CORY STEEBY PRESIDENT		07/13/2006

SECTION 4. FACILITY IDENTIFICATION

4.1		TRI Facility ID Number	New Facility
Facility or Establishment Name	EBW ELECTRONICS, INC.	Facility or Establishment Name or Mailing Address (if different from street address)	
Street	701 COMMERCE CT	Mailing Address	NA
City/County/State/Zip Code	HOLLAND OTTAWA MI 49424	City/State/Zip Code	Country (Non-US)

4.2	This report contains information for: (Important: check a or b; check c or d if applicable)	a. [X] An entire facility	b. [ ] Part of a facility	c. [ ] A Federal facility	d. [ ] GOCO	
4.3	Technical Contact Name	J CORY STEEBY			Telephone Number (include area code)	(616) 786-0575
	Email Address	csteeby@ebw-electronics.com				
4.4	Public Contact Name	J CORY STEEBY			Telephone Number (include area code)	(616) 786-0575

4.5	SIC Code (s) (4 digits)	Primary a. 3679	b.	c.	d.	e.	f.

4.6	Latitude	Degrees	Minutes	Seconds	Longitude	Degrees	Minutes	Seconds
		42	50	54		086	06	21

4.7 Dun & Bradstreet Number(s) (9 digits)	4.8 EPA Identification Number (RCRA I.D. No.) (12 characters)	4.9 Facility NPDES Permit Number(s) (9 characters)	4.10 Underground Injection Well Code (UIC) I.D. Number(s) (12 digits)
a. 799673603	a. NA	a. NA	a. NA
b.	b.	b.	b.

SECTION 5. PARENT COMPANY INFORMATION

5.1	Name of Parent Company	NA [X]	
5.2	Parent Company's Dun & Bradstreet Number	NA [X]	

File Copy - Do Not Submit to EPA

EPA FORM R

PART II. CHEMICAL - SPECIFIC INFORMATION

TRI Facility ID Number	
Trade Secret	
Toxic Chemical, Category or Generic Name	
Lead	

SECTION 1. TOXIC CHEMICAL IDENTITY (Important: DO NOT complete this section if you completed Section 2 below.)

1.1	CAS Number (Important: Enter only one number exactly as it appears on the Section 313 list. Enter category code if reporting a chemical category.) 7439-92-1
1.2	Toxic Chemical or Chemical Category Name (Important: Enter only one name exactly as it appears on the Section 313 list.) Lead
1.3	Generic Chemical Name (Important: Complete only if Part 1, Section 2.1 is checked "Yes". Generic Name must be structurally descriptive.) NA

1.4 Distribution of Each Member of the Dioxin and Dioxin-like Compounds Category.
(If there are any numbers in boxes 1-17, then every field must be filled in with either 0 or some number between 0.01 and 100. Distribution should be reported in percentages and the total should equal 100%. If you do not have speciation data available, indicate NA.)

NA	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
☐																	

SECTION 2. MIXTURE COMPONENT IDENTITY (Important: DO NOT complete this section if you completed Section 1 above.)

2.1	Generic Chemical Name Provided by Supplier (Important: Maximum of 70 characters, including numbers, letters, spaces, and punctuation.) NA

SECTION 3. ACTIVITIES AND USES OF THE TOXIC CHEMICAL AT THE FACILITY
(Important: Check all that apply.)

3.1 Manufacture the toxic chemical:	3.2 Process the toxic chemical:	3.3 Otherwise use the toxic chemical:
a. ☐ Produce b. ☐ Import		
If produce or import:	a. ☐ As a reactant	a. ☐ As a chemical processing aid
c. ☐ For on-site use/processing	b. ☐ As a formulation component	b. ☐ As a manufacturing aid
d. ☐ For sale/distribution	c. ☒ As an article component	c. ☐ Ancillary or other use
e. ☐ As a byproduct	d. ☐ Repackaging	
f. ☐ As an impurity	e. ☐ As an impurity	

SECTION 4. MAXIMUM AMOUNT OF THE TOXIC CHEMICAL ONSITE AT ANY TIME DURING THE CALENDAR YEAR

4.1 02 (Enter two-digit code from instruction package.)

SECTION 5. QUANTITY OF THE TOXIC CHEMICAL ENTERING EACH ENVIRONMENTAL MEDIUM ONSITE

			A. Total Release (pounds/year*) (Enter range code or estimate**)	B. Basis of Estimate (enter code)	C. % From Stormwater
5.1	Fugitive or non-point air emissions	NA ☒			
5.2	Stack or point air emissions	NA ☐	0	O	
5.3	Discharges to receiving streams or water bodies (enter one name per box)				
	Stream or Water Body Name				
5.3.1	NA				
5.3.2					
5.3.3					

If additional pages of Part II, Section 5.3 are attached, indicate the total number of pages in this box ☐
and indicate the Part II, Section 5.3 page number in this box. ☐ **(example: 1,2,3, etc.)**

* For Dioxin or Dioxin-like compounds, report in grams/year

** Range Codes: A= 1- 10 pounds; B= 11- 499 pounds; C= 500 - 999 pounds.

File Copy -- Do Not Submit to EPA

EPA FORM R

PART II. CHEMICAL - SPECIFIC INFORMATION (CONTINUED)

TRI Facility ID Number	
Name of Facility	
Toxic Chemical, Category, or Generic Name	Lead

SECTION 5. QUANTITY OF THE TOXIC CHEMICAL ENTERING EACH ENVIRONMENTAL MEDIUM ONSITE (Continued)

		NA	A. Total Release (pounds/year*) (enter range code** or estimate)	B. Basis of Estimate (enter code)
5.4.1	Underground Injection onsite to Class I Wells	X		
5.4.2	Underground Injection onsite to Class II-V Wells	X		
5.5	Disposal to land onsite			
5.5.1.A	RCRA Subtitle C landfills	X		
5.5.1.B	Other landfills	X		
5.5.2	Land treatment/application farming	X		
5.5.3A	RCRA Subtitle C Surface Impoundments	X		
5.5.3B	Other surface impoundments	X		
5.5.4	Other disposal	X		

SECTION 6. TRANSFERS OF THE TOXIC CHEMICAL IN WASTES TO OFF-SITE LOCATIONS

6.1 DISCHARGES TO PUBLICLY OWNED TREATMENT WORKS (POTWs)

6.1.A Total Quantity Transferred to POTWs and Basis of Estimate

6.1.A.1. Total Transfers (pounds/year*) (enter range code** or estimate)	6.1.A.2 Basis of Estimate (enter code)
NA	

6.1.B. 1	POTW Name	NA					
POTW Address							
City		State		County		Zip	
6.1.B.	POTW Name						
POTW Address							
City		State		County		Zip	

If additional pages of Part II, Section 6.1 are attached, indicate the total number of pages in this box [ ] and indicate the Part II, Section 6.1 page number in this box [ ] (example: 1,2,3, etc.)

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS

6.2. 1 Off-Site EPA Identification Number (RCRA ID No.)	110000318772								
Off-Site Location Name	ELECTRUM								
Off-site Address	827 MARTIN								
City	RAHWAY	State	NJ	County	UNION	Zip	07065	Country (Non-US)	
Is location under control of reporting facility or parent company?							[ ] Yes	[X] No	

* For Dioxin or Dioxin-like compounds, report in grams/year

** Range Codes: A= 1- 10 pounds; B= 11- 499 pounds; C= 500 - 999 pounds.

File Copy - Do Not Submit to EPA

EPA FORM R

PART II. CHEMICAL - SPECIFIC INFORMATION (CONTINUED)

TRI Facility ID Number	
New Facility	
Toxic Chemical, Category, or Generic Name	Lead

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS (Continued)

A. Total Transfers (pounds/year*) (enter range code** or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)
1. 1062	1. M	1. M24
2. NA	2.	2.
3.	3.	3.
4.	4.	4.

6.2. 2 Off-Site EPA Identification Number (RCRA ID No.) 110002025736

Off-Site location Name: AUTUMN HILLS RDF

Off-site Address: 700 56TH AVENUE

City	ZEELAND	State	MI	County	OTTAWA	Zip	49464	Country (Non-US)	

Is location under control of reporting facility or parent company? [ ] Yes [X] No

A. Total Transfers (pounds/year*) (enter range code** or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)
1. 0	1. O	1. M90
2. NA	2.	2.
3.	3.	3.
4.	4.	4.

SECTION 7A. ONSITE WASTE TREATMENT METHODS AND EFFICIENCY

[X] Not Applicable (NA) - Check here if no on-site waste treatment is applied to any waste stream containing the toxic chemical or chemical category.

a. General Waste Stream (enter code)	b. Waste Treatment Method(s) Sequence [enter 3-character code(s)]						c. Range of Influent Concentration	d. Waste Treatment Efficiency Estimate	e. Based on Operating Data ?
7A.1a	7A.1b	1		2			7A.1c	7A.1d	7A.1e
	3	4		5				%	Yes [ ] No [ ]
	6	7		8					
7A.2a	7A.2b	1		2			7A.2c	7A.2d	7A.2e
	3	4		5				%	Yes [ ] No [ ]
	6	7		8					
7A.3a	7A.3b	1		2			7A.3c	7A.3d	7A.3e
	3	4		5				%	Yes [ ] No [ ]
	6	7		8					
7A.4a	7A.4b	1		2			7A.4c	7A.4d	7A.4e
	3	4		5				%	Yes [ ] No [ ]
	6	7		8					
7A.5a	7A.5b	1		2			7A.5c	7A.5d	7A.5e
	3	4		5				%	Yes [ ] No [ ]
	6	7		8					

If additional pages of Part II, Section 6.2/7A are attached, indicate the total number of pages in this box [ ]
and indicate the Part II, Section 6.2/7A page number in this box: [ ] **(example: 1,2,3, etc.)**

* For Dioxin or Dioxin-like compounds, report in grams/year

** Range Codes: A= 1- 10 pounds; B= 11- 499 pounds; C= 500 - 999 pounds.

File Copy - Do Not Submit to EPA

EPA FORM R
PART II. CHEMICAL SPECIFIC INFORMATION (CONTINUED)

TRI Facility ID Number	
Name of Facility	
Toxic Chemical, Category, or Generic Name	Lead

SECTION 7B. ON-SITE ENERGY RECOVERY PROCESSES

[X] Not Applicable (NA) - Check here if no on-site energy recovery is applied to any waste stream containing the toxic chemical or chemical category.

Energy Recovery Methods [enter 3-character code(s)]

1 [ ] 2 [ ] 3 [ ]

SECTION 7C. ON-SITE RECYCLING PROCESSES

[X] Not Applicable (NA) - Check here if no on-site recyling is applied to any waste stream containing the toxic chemical or chemical category.

Recycling Methods [enter 3-character code(s)]

1 [ ] 2 [ ] 3 [ ] 4 [ ] 5 [ ]
6 [ ] 7 [ ] 8 [ ] 9 [ ] 10 [ ]

SECTION 8. SOURCE REDUCTION AND RECYCLING ACTIVITIES

		Column A Prior Year (pounds/year*)	Column B Current Reporting Year (pounds/year*)	Column C Following Year (pounds/year*)	Column D Second Following Year (pounds/year*)
8.1					
8.1a	Total on-site disposal to Class I Underground Injection Wells, RCRA Subtitle C landfills, and other landfills	NA	NA	NA	NA
8.1b	Total other on-site disposal or other releases	0	0	0	0
8.1c	Total off-site disposal to Class I Underground Injection Wells, RCRA Subtitle C landfills, and other landfills	NA	NA	NA	NA
8.1d	Total other off-site disposal or other releases	0	0	0	0
8.2	Quantity used for energy recovery onsite	NA	NA	NA	NA
8.3	Quantity used for energy recovery offsite	NA	NA	NA	NA
8.4	Quantity recycled onsite	NA	NA	NA	NA
8.5	Quantity recycled offsite	1388	1062	570	800
8.6	Quantity treated onsite	NA	NA	NA	NA
8.7	Quantity treated offsite	NA	NA	NA	NA
8.8	Quantity released to the environment as a result of remedial actions, catastrophic events, or one-time events not associated with production processes (pounds/year)			NA	
8.9	Production ratio or activity index			1.00	

8.10 Did your facility engage in any source reduction activities for this chemical during the reporting year? If not, enter "NA" in Section 8.10.1 and answer Section 8.11.

	Source Reduction Activities [enter code(s)]	Methods to Identify Activity (enter codes)		
8.10.1	NA	a.	b.	c.
8.10.2		a.	b.	c.
8.10.3		a.	b.	c.
8.10.4		a.	b.	c.

		Yes	No
8.11	Is additional information on source reduction, recycling, or pollution control activities included with this report ? (Check one Box)	[ ]	[X]

*For Dioxin or Dioxin-like compounds, report in grams/year

EBW ELECTRONICS

Design, engineering, and manufacturing of electronic products

EBW Electronics, Inc.
13110 Ransom ST
Holland, MI 49424

July 13, 2006

Robert Jackson
State Emergency Planning Community Right-to-Know
Michigan Department of Environmental Quality
Environmental Science and Services Division
PO Box 30457
Lansing MI 48909

To Whom It May Concern:

Enclosed with this cover letter is a CD containing TRI data for Reporting years 2001 through 2004 along with the signature certification letters for those same years. It became known to EBW Electronics, Inc. earlier this year that this data should have been sent to the EPA starting in 2002 with data from 2001. This filing is to bring EBW Electronics reporting up to date with the requirements. Our 2006 filing for RY2005 was reported per the July 1 deadline, and thus is not included in this submittal. We have accomplished this task through direction of Mr. John Myrhe, Multi-Program Inspector, Waste, Pesticides, & Toxics Enforcement Section.

It is the hope of EBW Electronics, Inc. that there will not be monetary penalties associated with our late filings. We trust that our cooperation and our bringing the filings up to date voluntarily will serve as evidence that the lack of filing was not intentional. Indeed EBW Electronics was unaware of our filing requirement until early this year through Mr Myhre. EBW Electronics is a small business and penalties would do significant damage to our business.

Kind Regards,

Cory Steeby
President

cc: Mr. John Myhre

Signature Certification for State Diskette Submission

DISK

EBW ELECTRONICS, INC.
701 COMMERCE CT
HOLLAND, MI 49424
NEW FACILITY

July 13, 2006

Robert Jackson
State Emergency Planning and Community
Right-to-Know
Michigan Department of Environmental
Quality
Environmental Science and Services Division
P.O. Box 30457
Lansing, MI 48909
(517) 373-8481; Fax: (517) 241-7966

To Whom It May Concern:

Enclosed please find one (1) microcomputer diskette containing toxic chemical release reporting information for:

EBW ELECTRONICS, INC.

This information is submitted as required under section 313 of the Emergency Planning and Community Right-to-Know Act of 1986 and the Pollution Prevention Act of 1990.

We are submitting a total of 1 chemical report(s) for our facility.

These 1 chemical report(s) are described below:

TRI Chemical or Chemical Category	Reporting Year	CAS Number	Report
Lead	2004	7439-92-1	Form R

Our technical point of contact is:

J CORY STEEBY
(616) 786-0575
CSTEEBY@EBW-ELECTRONICS.COM

and is available should any questions or problems arise in the processing of this diskette.

If the enclosed diskette contains one or more Form R chemicals, then I hereby certify that I have reviewed the enclosed documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report(s) are accurate based on reasonable estimates using data available to the preparers of this report(s).

If the enclosed diskette contains one or more Form A chemicals, then I hereby certify that to the best of my knowledge and belief, for each toxic chemical listed in the Form A statement, the annual reportable amount as defined in 40 CFR 372.27(a) did not exceed 500 pounds for this reporting year and that the chemical was manufactured, processed or otherwise used in an amount not exceeding 1 million pounds during the reporting year.

Sincerely,

J CORY STEEBY
PRESIDENT

Enclosure: Diskette

U.S. EPA Diskette

Submission Checklist

	PLEASE CHECK AND COMPLETE EACH STEP BELOW:	Complete?
1.	The submission diskette is a new diskette. Older diskettes (for example, "recycled" diskettes) have caused upload problems in the past.	☐
2.	The diskette is a 3.5" high-density (1.44 MB) Windows-compatible diskette.	☐
3.	The diskette contains only files created by TRI-ME. Any other files on the diskette may cause the entire diskette to be rejected during the upload process into the Toxics Release Inventory System (TRIS).	☐
4.	The diskette has been virus-checked and it is virus free.	☐
5.	Attach a label to each diskette. The label should be in the following format:	☐

TRIS Report
(Your Company Name)

Date:	07-01-2005
Density:	HD
Report Year:	2004
Number:	1 of 1
Contact:	(Technical Contact Name) (Technical Contact Phone)

6.	**The certification letter is signed by a senior management official per EPCRA section 313(g)(1)(B).**	☐
7.	Use the correct address:	☐

Certified mail, overnight mail, or hand-delivered

TRI Data Processing Center
c/o Computer Sciences Corportation
Suite 300
8400 Corporate Drive
Landover, MD 20785

(301) 429-5005

All other submissions

TRI Data Processing Center
P.O. Box 1513
Lanham, MD 20703-1513

8.	**The envelope contains only the submission diskette and the signed certification letter. (Do not send paper forms with a diskette submission.)**	☐
9.	**The signed certification letter and diskette must be postmarked and mailed on or before July 1, 2005.**	☐

File Copy -- Do Not Submit to EPA

EPA United States Environmental Protection Agency

FORM R

Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986, also known as Title III of the Superfund Amendments and Reauthorization Act

TRI Facility ID Number	
New Facility	
Toxic Chemical, Category or Generic Name	
Lead	

WHERE TO SEND COMPLETED FORMS: 1. TRI Data Processing Center P.O.Box 1513 Lanham, MD 20703-1513 2. APPROPRIATE STATE OFFICE (See instructions in Appendix F)

Enter "X" here if this is a revision: [ ]

For EPA use only

Important: See instructions to determine when "Not Applicable (NA)" boxes should be checked.

PART I. FACILITY IDENTIFICATION INFORMATION

SECTION 1. REPORTING YEAR 2004

SECTION 2. TRADE SECRET INFORMATION

2.1	Are you claiming the toxic chemical identified on page 2 trade secret? [ ] Yes (Answer question 2.2; Attach substantiation forms) [X] NO (Do not answer 2.2; Go to Section 3)	2.2	Is this copy [ ] Sanitized [ ] Unsanitized (Answer only if "YES" in 2.1)

SECTION 3. CERTIFICATION (Important: Read and sign after completing all form sections.)

I hereby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data available to the preparers of this report.

Name and official title of owner/operator or senior management official:	Signature:	Date Signed:
J CORY STEEBY PRESIDENT		07/13/2006

SECTION 4. FACILITY IDENTIFICATION

4.1		TRI Facility ID Number	New Facility
Facility or Establishment Name	EBW ELECTRONICS, INC.	Facility or Establishment Name or Mailing Address (if different from street address)	
Street	701 COMMERCE CT	Mailing Address	NA
City/County/State/Zip Code	HOLLAND OTTAWA MI 49424	City/State/Zip Code	Country (Non-US

4.2	This report contains information for: (Important: check a or b; check c or d if applicable)	a. [X] An entire facility	b. [ ] Part of a facility	c. [ ] A Federal facility	d. [ ] GOCO		
4.3	Technical Contact Name	J CORY STEEBY			Telephone Number (include area code)	(616) 786-0575	
	Email Address	csteeby@ebw-electronics.com					
4.4	Public Contact Name	J CORY STEEBY			Telephone Number (include area code)	(616) 786-0575	
4.5	SIC Code (s) (4 digits)	Primary a. 3679	b.	c.	d.	e.	f.

4.6	Latitude	Degrees	Minutes	Seconds	Longitude	Degrees	Minutes	Seconds
		42	50	54		086	06	21

4.7 Dun & Bradstreet Number(s) (9 digits)	4.8 EPA Identification Number (RCRA I.D. No.) (12 characters)	4.9 Facility NPDES Permit Number(s) (9 characters)	4.10 Underground Injection Well Code (UIC) I.D. Number(s) (12 digits)
a. 799673603	a. NA	a. NA	a. NA
b.	b.	b.	b.

SECTION 5. PARENT COMPANY INFORMATION

5.1	Name of Parent Company	NA [X]	
5.2	Parent Company's Dun & Bradstreet Number	NA [X]	

File Copy - Do Not Submit to EPA

EPA FORM R
PART II. CHEMICAL - SPECIFIC INFORMATION

TRI Facility ID Number	
Revision	
Toxic Chemical, Category or Generic Name	
Lead	

SECTION 1. TOXIC CHEMICAL IDENTITY (Important: DO NOT complete this section if you completed Section 2 below.)

1.1	CAS Number (Important: Enter only one number exactly as it appears on the Section 313 list. Enter category code if reporting a chemical category.) 7439-92-1
1.2	Toxic Chemical or Chemical Category Name (Important: Enter only one name exactly as it appears on the Section 313 list.) Lead
1.3	Generic Chemical Name (Important: Complete only if Part 1, Section 2.1 is checked "Yes". Generic Name must be structurally descriptive.) NA

1.4 Distribution of Each Member of the Dioxin and Dioxin-like Compounds Category.
(If there are any numbers in boxes 1-17, then every field must be filled in with either 0 or some number between 0.01 and 100. Distribution should be reported in percentages and the total should equal 100%. If you do not have speciation data available, indicate NA.)

NA	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
☐																	

SECTION 2. MIXTURE COMPONENT IDENTITY (Important: DO NOT complete this section if you completed Section 1 above.)

2.1	Generic Chemical Name Provided by Supplier (Important: Maximum of 70 characters, including numbers, letters, spaces, and punctuation.) NA

SECTION 3. ACTIVITIES AND USES OF THE TOXIC CHEMICAL AT THE FACILITY
(Important: Check all that apply.)

3.1 Manufacture the toxic chemical:	3.2 Process the toxic chemical:	3.3 Otherwise use the toxic chemical:
a. ☐ Produce b. ☐ Import		
If produce or import:	a. ☐ As a reactant	a. ☐ As a chemical processing aid
c. ☐ For on-site use/processing	b. ☐ As a formulation component	b. ☐ As a manufacturing aid
d. ☐ For sale/distribution	c. ☒ As an article component	c. ☐ Ancillary or other use
e. ☐ As a byproduct	d. ☐ Repackaging	
f. ☐ As an impurity	e. ☐ As an impurity	

SECTION 4. MAXIMUM AMOUNT OF THE TOXIC CHEMICAL ONSITE AT ANY TIME DURING THE CALENDAR YEAR

4.1	02	(Enter two-digit code from instruction package.)

SECTION 5. QUANTITY OF THE TOXIC CHEMICAL ENTERING EACH ENVIRONMENTAL MEDIUM ONSITE

			A. Total Release (pounds/year*) (Enter range code or estimate**)	B. Basis of Estimate (enter code)	C. % From Stormwater
5.1	Fugitive or non-point air emissions	NA ☒			
5.2	Stack or point air emissions	NA ☐	0	O	
5.3	Discharges to receiving streams or water bodies (enter one name per box)				
	Stream or Water Body Name				
5.3.1	NA				
5.3.2					
5.3.3					

If additional pages of Part II, Section 5.3 are attached, indicate the total number of pages in this box ☐
and indicate the Part II, Section 5.3 page number in this box. ☐ (example: 1,2,3, etc.)

* For Dioxin or Dioxin-like compounds, report in grams/year

** Range Codes: A= 1- 10 pounds; B= 11- 499 pounds; C= 500 - 999 pounds.

File Copy -- Do Not Submit to EPA

EPA FORM R

PART II. CHEMICAL - SPECIFIC INFORMATION (CONTINUED)

TRI Facility ID Number	
Name of Facility	
Toxic Chemical, Category, or Generic Name	
Lead	

SECTION 5. QUANTITY OF THE TOXIC CHEMICAL ENTERING EACH ENVIRONMENTAL MEDIUM ONSITE (Continued)

		NA	A. Total Release (pounds/year*) (enter range code** or estimate)	B. Basis of Estimate (enter code)
5.4.1	Underground Injection onsite to Class I Wells	X		
5.4.2	Underground Injection onsite to Class II-V Wells	X		
5.5	Disposal to land onsite			
5.5.1.A	RCRA Subtitle C landfills	X		
5.5.1.B	Other landfills	X		
5.5.2	Land treatment/application farming	X		
5.5.3A	RCRA Subtitle C Surface Impoundments	X		
5.5.3B	Other surface impoundments	X		
5.5.4	Other disposal	X		

SECTION 6. TRANSFERS OF THE TOXIC CHEMICAL IN WASTES TO OFF-SITE LOCATIONS

6.1 DISCHARGES TO PUBLICLY OWNED TREATMENT WORKS (POTWs)

6.1.A Total Quantity Transferred to POTWs and Basis of Estimate

6.1.A.1. Total Transfers (pounds/year*) (enter range code** or estimate)	6.1.A.2 Basis of Estimate (enter code)
NA	

6.1.B. 1	POTW Name	NA					
POTW Address							
City		State		County		Zip	
6.1.B.	POTW Name						
POTW Address							
City		State		County		Zip	

If additional pages of Part II, Section 6.1 are attached, indicate the total number of pages in this box [ ] and indicate the Part II, Section 6.1 page number in this box [ ] (example: 1,2,3, etc.)

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS

6.2. 1 Off-Site EPA Identification Number (RCRA ID No.)	110000318772								
Off-Site Location Name	ELECTRUM								
Off-site Address	827 MARTIN								
City	RAHWAY	State	NJ	County	UNION	Zip	07065	Country (Non-US)	
Is location under control of reporting facility or parent company?							[ ] Yes	[X] No	

* For Dioxin or Dioxin-like compounds, report in grams/year

** Range Codes: A= 1- 10 pounds; B= 11- 499 pounds; C= 500 - 999 pounds.

File Copy -- Do Not Submit to EPA

EPA FORM R

PART II. CHEMICAL SPECIFIC INFORMATION (CONTINUED)

TRI Facility ID Number	
New Facility	
Toxic Chemical, Category, or Generic Name	
Lead	

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS (Continued)

A. Total Transfers (pounds/year*) (enter range code** or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)
1. 1062	1. M	1. M24
2. NA	2.	2.
3.	3.	3.
4.	4.	4.

6.2. 2 Off-Site EPA Identification Number (RCRA ID No.) 110002025736

Off-Site location Name: AUTUMN HILLS RDF

Off-site Address: 700 56TH AVENUE

City	ZEELAND	State	MI	County	OTTAWA	Zip	49464	Country (Non-US)	

Is location under control of reporting facility or parent company? [ ] Yes [X] No

A. Total Transfers (pounds/year*) (enter range code** or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)
1. 0	1. O	1. M90
2. NA	2.	2.
3.	3.	3.
4.	4.	4.

SECTION 7A. ONSITE WASTE TREATMENT METHODS AND EFFICIENCY

[X] Not Applicable (NA) - Check here if no on-site waste treatment is applied to any waste stream containing the toxic chemical or chemical category.

a. General Waste Stream (enter code)	b. Waste Treatment Method(s) Sequence [enter 3-character code(s)]						c. Range of Influent Concentration	d. Waste Treatment Efficiency Estimate	e. Based on Operating Data ?
7A.1a	7A.1b	1		2			7A.1c	7A.1d	7A.1e
	3	4		5				%	Yes [ ] No [ ]
	6	7		8					
7A.2a	7A.2b	1		2			7A.2c	7A.2d	7A.2e
	3	4		5				%	Yes [ ] No [ ]
	6	7		8					
7A.3a	7A.3b	1		2			7A.3c	7A.3d	7A.3e
	3	4		5				%	Yes [ ] No [ ]
	6	7		8					
7A.4a	7A.4b	1		2			7A.4c	7A.4d	7A.4e
	3	4		5				%	Yes [ ] No [ ]
	6	7		8					
7A.5a	7A.5b	1		2			7A.5c	7A.5d	7A.5e
	3	4		5				%	Yes [ ] No [ ]
	6	7		8					

If additional pages of Part II, Section 6.2/7A are attached, indicate the total number of pages in this box [ ]
and indicate the Part II, Section 6.2/7A page number in this box: [ ] **(example: 1,2,3, etc.)**

* For Dioxin or Dioxin-like compounds, report in grams/year

** Range Codes: A= 1- 10 pounds; B= 11- 499 pounds; C= 500 - 999 pounds.

File Copy - Do Not Submit to EPA

EPA FORM R
PART II. CHEMICAL SPECIFIC INFORMATION (CONTINUED)

TRI Facility ID Number	
Dev Facility	
Toxic Chemical, Category, or Generic Name	Lead

SECTION 7B. ON-SITE ENERGY RECOVERY PROCESSES

[X] Not Applicable (NA) - Check here if no on-site energy recovery is applied to any waste stream containing the toxic chemical or chemical category.

Energy Recovery Methods [enter 3-character code(s)]

1 [ ] 2 [ ] 3 [ ]

SECTION 7C. ON-SITE RECYCLING PROCESSES

[X] Not Applicable (NA) - Check here if no on-site recyling is applied to any waste stream containing the toxic chemical or chemical category.

Recycling Methods [enter 3-character code(s)]

1 [ ] 2 [ ] 3 [ ] 4 [ ] 5 [ ]
6 [ ] 7 [ ] 8 [ ] 9 [ ] 10 [ ]

SECTION 8. SOURCE REDUCTION AND RECYCLING ACTIVITIES

		Column A Prior Year (pounds/year*)	Column B Current Reporting Year (pounds/year*)	Column C Following Year (pounds/year*)	Column D Second Following Year (pounds/year*)
8.1					
8.1a	Total on-site disposal to Class I Underground Injection Wells, RCRA Subtitle C landfills, and other landfills	NA	NA	NA	NA
8.1b	Total other on-site disposal or other releases	0	0	0	0
8.1c	Total off-site disposal to Class I Underground Injection Wells, RCRA Subtitle C landfills, and other landfills	NA	NA	NA	NA
8.1d	Total other off-site disposal or other releases	0	0	0	0
8.2	Quantity used for energy recovery onsite	NA	NA	NA	NA
8.3	Quantity used for energy recovery offsite	NA	NA	NA	NA
8.4	Quantity recycled onsite	NA	NA	NA	NA
8.5	Quantity recycled offsite	1388	1062	570	800
8.6	Quantity treated onsite	NA	NA	NA	NA
8.7	Quantity treated offsite	NA	NA	NA	NA
8.8	Quantity released to the environment as a result of remedial actions, catastrophic events, or one-time events not associated with production processes (pounds/year)			NA	
8.9	Production ratio or activity index			1.00	

8.10 Did your facility engage in any source reduction activities for this chemical during the reporting year? If not, enter "NA" in Section 8.10.1 and answer Section 8.11.

	Source Reduction Activities [enter code(s)]	Methods to Identify Activity (enter codes)		
8.10.1	NA	a.	b.	c.
8.10.2		a.	b.	c.
8.10.3		a.	b.	c.
8.10.4		a.	b.	c.

8.11	Is additional information on source reduction, recycling, or pollution control activities included with this report ? (Check one Box)	Yes [ ]	No [X]

*For Dioxin or Dioxin-like compounds, report in grams/year

Signature Certification for U.S. EPA Diskette Submission

EBW ELECTRONICS, INC.
701 COMMERCE CT
HOLLAND, MI 49424
NEW FACILITY

July 13, 2006

TRI Data Processing Center
c/o Computer Sciences Corportation
Suite 300
8400 Corporate Drive
Landover, MD 20785

(301) 429-5005

To Whom It May Concern:

Enclosed please find one (1) microcomputer diskette containing toxic chemical release reporting information for:

EBW ELECTRONICS, INC.

This information is submitted as required under section 313 of the Emergency Planning and Community Right-to-Know Act of 1986 and the Pollution Prevention Act of 1990.

We are submitting a total of 1 chemical report(s) for our facility.

These 1 chemical report(s) are described below:

TRI Chemical or Chemical Category	Reporting Year	CAS Number	Report
Lead	2003	7439-92-1	Form R

Our technical point of contact is:

J CORY STEEBY
(616) 786-0575
CSTEEBY@EBW-ELECTRONICS.COM

and is available should any questions or problems arise in the processing of this diskette.

If the enclosed diskette contains one or more Form R chemicals, then I hereby certify that I have reviewed the enclosed documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report(s) are accurate based on reasonable estimates using data available to the preparers of this report(s).

If the enclosed diskette contains one or more Form A chemicals, then I hereby certify that to the best of my knowledge and belief, for each toxic chemical listed in the Form A statement, the annual reportable amount as defined in 40 CFR 372.27(a) did not exceed 500 pounds for this reporting year and that the chemical was manufactured, processed or otherwise used in an amount not exceeding 1 million pounds during the reporting year.

Sincerely,

NEW FACILITY
EBW ELECTRONICS, INC.

J CORY STEEBY
PRESIDENT

Enclosure: Diskette

U.S. EPA Diskette

Submission Checklist

	PLEASE CHECK AND COMPLETE EACH STEP BELOW:	Complete?
1.	The submission diskette is a new diskette. Older diskettes (for example, "recycled" diskettes) have caused upload problems in the past.	☐
2.	The diskette is a 3.5" high-density (1.44 MB) Windows-compatible diskette.	☐
3.	The diskette contains only files created by TRI-ME. Any other files on the diskette may cause the entire diskette to be rejected during the upload process into the Toxics Release Inventory System (TRIS).	☐
4.	The diskette has been virus-checked and it is virus free.	☐
5.	Attach a label to each diskette. The label should be in the following format:	☐

TRIS Report
(Your Company Name)

Date:	07-01-2003
Density:	HD
Report Year:	2003
Number:	1 of 1
Contact:	(Technical Contact Name) (Technical Contact Phone)

6.	**The certification letter is signed by a senior management official per EPCRA section 313(g)(1)(B).**	☐
7.	Use the correct address:	☐

Certified mail, overnight mail, or hand-delivered

TRI Data Processing Center
c/o Computer Sciences Corportation
Suite 300
8400 Corporate Drive
Landover, MD 20785

(301) 429-5005

All other submissions

TRI Data Processing Center
P.O. Box 1513
Lanham, MD 20703-1513

8.	**The envelope contains only the submission diskette and the signed certification letter. (Do not send paper forms with a diskette submission.)**	☐
9.	**The signed certification letter and diskette must be postmarked and mailed on or before July 1, 2004.**	☐

File Copy -- Do Not Submit to EPA

EPA United States Environmental Protection Agency

FORM R

Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986, also known as Title III of the Superfund Amendments and Reauthorization Act

TRI Facility ID Number
NEW FACILITY
Toxic Chemical, Category or Generic Name
Lead

WHERE TO SEND COMPLETED FORMS: 1. TRI Data Processing Center, P.O.Box 1513, Lanham, MD 20703-1513 2. APPROPRIATE STATE OFFICE (See instructions in Appendix F)

Enter "X" here if this is a revision: [ ]

For EPA use only

Important: See instructions to determine when "Not Applicable (NA)" boxes should be checked.

PART I. FACILITY IDENTIFICATION INFORMATION

SECTION 1. REPORTING YEAR 2003

SECTION 2. TRADE SECRET INFORMATION

2.1	Are you claiming the toxic chemical identified on page 2 trade secret? [ ] Yes (Answer question 2.2; Attach substantiation forms) [X] NO (Do not answer 2.2; Go to Section 3)	2.2	Is this copy [ ] Sanitized [ ] Unsanitized (Answer only if "YES" in 2.1)

SECTION 3. CERTIFICATION (Important: Read and sign after completing all form sections.)

I hereby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data availble to the preparers of this report.

Name and official title of owner/operator or senior management official:	Signature:	Date Signed:
J CORY STEEBY PRESIDENT		07/13/2006

SECTION 4. FACILITY IDENTIFICATION

4.1		TRI Facility ID Number	NEW FACILITY
Facility or Establishment Name	EBW ELECTRONICS, INC.	Facility or Establishment Name or Mailing Address (if different from street address)	
Street	701 COMMERCE CT	Mailing Address	NA
City/County/State/Zip Code	HOLLAND OTTAWA MI 49424	City/State/Zip Code	Country (Non-US

4.2	This report contains information for: (Important: check a or b; check c or d if applicable)	a. [X] An entire facility	b. [ ] Part of a facility	c. [ ] A Federal facility	d. [ ] GOCO		
4.3	Technical Contact Name	J CORY STEEBY			Telephone Number (include area code)	(616) 786-0575	
	Email Address	csteeby@ebw-electronics.com					
4.4	Public Contact Name	J CORY STEEBY			Telephone Number (include area code)	(616) 786-0575	
4.5	SIC Code (s) (4 digits)	Primary a. 3679	b.	c.	d.	e.	f.

4.6	Latitude	Degrees	Minutes	Seconds	Longitude	Degrees	Minutes	Seconds
		42	06	43		086	49	11

4.7 Dun & Bradstreet Number(s) (9 digits)	4.8 EPA Identification Number (RCRA I.D. No.) (12 characters)	4.9 Facility NPDES Permit Number(s) (9 characters)	4.10 Underground Injection Well Code (UIC) I.D. Number(s) (12 digits)
a. 799673603	a. NA	a. NA	a. NA
b.	b.	b.	b.

SECTION 5. PARENT COMPANY INFORMATION

5.1	Name of Parent Company	NA [X]	
5.2	Parent Company's Dun & Bradstreet Number	NA [X]	

File Copy - Do Not Submit to EPA

EPA FORM R
PART II. CHEMICAL - SPECIFIC INFORMATION

TRI Facility ID Number	
NEW FACILITY	
Toxic Chemical, Category or Generic Name	
Lead	

SECTION 1. TOXIC CHEMICAL IDENTITY (Important: DO NOT complete this section if you completed Section 2 below.)

1.1	CAS Number (Important: Enter only one number exactly as it appears on the Section 313 list. Enter category code if reporting a chemical category.) 7439-92-1
1.2	Toxic Chemical or Chemical Category Name (Important: Enter only one name exactly as it appears on the Section 313 list.) Lead
1.3	Generic Chemical Name (Important: Complete only if Part 1, Section 2.1 is checked "Yes". Generic Name must be structurally descriptive.) NA

1.4 Distribution of Each Member of the Dioxin and Dioxin-like Compounds Category.
(If there are any numbers in boxes 1-17, then every field must be filled in with either 0 or some number between 0.01 and 100. Distribution should be reported in percentages and the total should equal 100%. If you do not have speciation data available, indicate NA.)

NA	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
☐																	

SECTION 2. MIXTURE COMPONENT IDENTITY (Important: DO NOT complete this section if you completed Section 1 above.)

2.1	Generic Chemical Name Provided by Supplier (Important: Maximum of 70 characters, including numbers, letters, spaces, and punctuation.) NA

SECTION 3. ACTIVITIES AND USES OF THE TOXIC CHEMICAL AT THE FACILITY
(Important: Check all that apply.)

3.1 Manufacture the toxic chemical:	3.2 Process the toxic chemical:	3.3 Otherwise use the toxic chemical:
a. ☐ Produce b. ☐ Import		
If produce or import:	a. ☐ As a reactant	a. ☐ As a chemical processing aid
c. ☐ For on-site use/processing	b. ☐ As a formulation component	b. ☐ As a manufacturing aid
d. ☐ For sale/distribution	c. ☒ As an article component	c. ☐ Ancillary or other use
e. ☐ As a byproduct	d. ☐ Repackaging	
f. ☐ As an impurity	e. ☐ As an impurity	

SECTION 4. MAXIMUM AMOUNT OF THE TOXIC CHEMICAL ONSITE AT ANY TIME DURING THE CALENDAR YEAR

4.1 02 (Enter two-digit code from instruction package.)

SECTION 5. QUANTITY OF THE TOXIC CHEMICAL ENTERING EACH ENVIRONMENTAL MEDIUM ONSITE

			A. Total Release (pounds/year*) (Enter range code or estimate**)	B. Basis of Estimate (enter code)	C. % From Stormwater
5.1	Fugitive or non-point air emissions	NA ☒			
5.2	Stack or point air emissions	NA ☐	0	O	
5.3	Discharges to receiving streams or water bodies (enter one name per box)				
	Stream or Water Body Name				
5.3.1	NA				
5.3.2					
5.3.3					

If additional pages of Part II, Section 5.3 are attached, indicate the total number of pages in this box ☐ and indicate the Part II, Section 5.3 page number in this box. ☐ (example: 1,2,3, etc.)

* For Dioxin or Dioxin-like compounds, report in grams/year

** Range Codes: A= 1- 10 pounds; B= 11- 499 pounds; C= 500 - 999 pounds.

File Copy - Do Not Submit to EPA

EPA FORM R

PART II. CHEMICAL - SPECIFIC INFORMATION (CONTINUED)

TRI Facility ID Number	
NEW FACILITY	
Toxic Chemical, Category, or Generic Name	
Lead	

SECTION 5. QUANTITY OF THE TOXIC CHEMICAL ENTERING EACH ENVIRONMENTAL MEDIUM ONSITE (Continued)

		NA	A. Total Release (pounds/year*) (enter range code** or estimate)	B. Basis of Estimate (enter code)
5.4.1	Underground Injection onsite to Class I Wells	X		
5.4.2	Underground Injection onsite to Class II-V Wells	X		
5.5	Disposal to land onsite			
5.5.1.A	RCRA Subtitle C landfills	X		
5.5.1.B	Other landfills	X		
5.5.2	Land treatment/application farming	X		
5.5.3A	RCRA Subtitle C Surface Impoundments	X		
5.5.3B	Other surface impoundments	X		
5.5.4	Other disposal	X		

SECTION 6. TRANSFERS OF THE TOXIC CHEMICAL IN WASTES TO OFF-SITE LOCATIONS

6.1 DISCHARGES TO PUBLICLY OWNED TREATMENT WORKS (POTWs)

6.1.A Total Quantity Transferred to POTWs and Basis of Estimate

6.1.A.1. Total Transfers (pounds/year*) (enter range code** or estimate)	6.1.A.2 Basis of Estimate (enter code)
NA	

6.1.B. 1	POTW Name	NA					
POTW Address							
City		State		County		Zip	
6.1.B.	POTW Name						
POTW Address							
City		State		County		Zip	

If additional pages of Part II, Section 6.1 are attached, indicate the total number of pages in this box [ ] and indicate the Part II, Section 6.1 page number in this box [ ] (example: 1,2,3, etc.)

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS

6.2. 1 Off-Site EPA Identification Number (RCRA ID No.)	110000318772
Off-Site Location Name	ELECTRUM
Off-site Address	827 MARTIN

City	RAHWAY	State	NJ	County	UNION	Zip	07065	Country (Non-US)	

Is location under control of reporting facility or parent company? [ ] Yes [X] No

* For Dioxin or Dioxin-like compounds, report in grams/year

** Range Codes: A= 1- 10 pounds; B= 11- 499 pounds; C= 500 - 999 pounds.

File Copy -- Do Not Submit to EPA

EPA FORM R

PART II. CHEMICAL - SPECIFIC INFORMATION (CONTINUED)

TRI Facility ID Number
NEW FACILITY
Toxic Chemical, Category, or Generic Name
Lead

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS (Continued)

A. Total Transfers (pounds/year*) (enter range code** or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)
1. 1388	1. M	1. M24
2. NA	2.	2.
3.	3.	3.
4.	4.	4.

6.2. 2 Off-Site EPA Identification Number (RCRA ID No.) 110002025736

Off-Site location Name: AUTUMN HILLS RDF

Off-site Address: 700 56TH AVENUE

City	ZEELAND	State	MI	County	OTTAWA	Zip	49464	Country (Non-US)	

Is location under control of reporting facility or parent company? [ ] Yes [X] No

A. Total Transfers (pounds/year*) (enter range code** or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)
1. 0	1. O	1. M90
2. NA	2.	2.
3.	3.	3.
4.	4.	4.

SECTION 7A. ONSITE WASTE TREATMENT METHODS AND EFFICIENCY

[X] Not Applicable (NA) - Check here if no on-site waste treatment is applied to any waste stream containing the toxic chemical or chemical category.

a. General Waste Stream (enter code)	b. Waste Treatment Method(s) Sequence [enter 3-character code(s)]	c. Range of Influent Concentration	d. Waste Treatment Efficiency Estimate	e. Based on Operating Data ?
7A.1a	7A.1b 1 2 3 4 5 6 7 8	7A.1c	7A.1d %	7A.1e Yes [ ] No [ ]
7A.2a	7A.2b 1 2 3 4 5 6 7 8	7A.2c	7A.2d %	7A.2e Yes [ ] No [ ]
7A.3a	7A.3b 1 2 3 4 5 6 7 8	7A.3c	7A.3d %	7A.3e Yes [ ] No [ ]
7A.4a	7A.4b 1 2 3 4 5 6 7 8	7A.4c	7A.4d %	7A.4e Yes [ ] No [ ]
7A.5a	7A.5b 1 2 3 4 5 6 7 8	7A.5c	7A.5d %	7A.5e Yes [ ] No [ ]

If additional pages of Part II, Section 6.2/7A are attached, indicate the total number of pages in this box [ ]
and indicate the Part II, Section 6.2/7A page number in this box: [ ] (example: 1,2,3, etc.)

* For Dioxin or Dioxin-like compounds, report in grams/year

** Range Codes: A= 1- 10 pounds; B= 11- 499 pounds; C= 500 - 999 pounds.

File Copy - Do Not Submit to EPA

EPA FORM R
PART II. CHEMICAL SPECIFIC INFORMATION (CONTINUED)

TRI Facility ID Number	
NEW FACILITY	
Toxic Chemical, Category, or Generic Name	
Lead	

SECTION 7B. ON-SITE ENERGY RECOVERY PROCESSES

[X] Not Applicable (NA) - Check here if no on-site energy recovery is applied to any waste stream containing the toxic chemical or chemical category.

Energy Recovery Methods [enter 3-character code(s)]

1 [ ] 2 [ ] 3 [ ]

SECTION 7C. ON-SITE RECYCLING PROCESSES

[X] Not Applicable (NA) - Check here if no on-site recyling is applied to any waste stream containing the toxic chemical or chemical category.

Recycling Methods [enter 3-character code(s)]

1 [ ] 2 [ ] 3 [ ] 4 [ ] 5 [ ]
6 [ ] 7 [ ] 8 [ ] 9 [ ] 10 [ ]

SECTION 8. SOURCE REDUCTION AND RECYCLING ACTIVITIES

		Column A Prior Year (pounds/year*)	Column B Current Reporting Year (pounds/year*)	Column C Following Year (pounds/year*)	Column D Second Following Year (pounds/year*)
8.1					
8.1a	Total on-site disposal to Class I Underground Injection Wells, RCRA Subtitle C landfills, and other landfills	NA	NA	NA	NA
8.1b	Total other on-site disposal or other releases	0	0	0	0
8.1c	Total off-site disposal to Class I Underground Injection Wells, RCRA Subtitle C landfills, and other landfills	0	NA	0	0
8.1d	Total other off-site disposal or other releases	0	0	0	0
8.2	Quantity used for energy recovery onsite	NA	NA	NA	NA
8.3	Quantity used for energy recovery offsite	NA	NA	NA	NA
8.4	Quantity recycled onsite	NA	NA	NA	NA
8.5	Quantity recycled offsite	1255	1388	1062	570
8.6	Quantity treated onsite	NA	NA	NA	NA
8.7	Quantity treated offsite	NA	NA	NA	NA
8.8	Quantity released to the environment as a result of remedial actions, catastrophic events, or one-time events not associated with productionprocesses (pounds/year)	NA			
8.9	Production ratio or activity index	1.00			

8.10 Did your facility engage in any source reduction activities for this chemical during the reporting year? If not, enter "NA" in Section 8.10.1 and answer Section 8.11.

	Source Reduction Activities [enter code(s)]	Methods to Identify Activity (enter codes)		
8.10.1	NA	a.	b.	c.
8.10.2		a.	b.	c.
8.10.3		a.	b.	c.
8.10.4		a.	b.	c.

8.11	Is additional information on source reduction, recycling, or pollution control activities included with this report ? (Check one Box)	Yes [ ]	No [X]

*For Dioxin or Dioxin-like compounds, report in grams/year

Signature Certification for State Diskette Submission

EBW ELECTRONICS, INC.
701 COMMERCE CT
HOLLAND, MI 49424
NEW FACILITY

July 13, 2006

Mr. Robert Jackson
State Emergency Planning and Community Right-to-Know
Michigan Dept. of Environmental Quality
Environmental Science and Services Division
P.O. Box 30457
Lansing, MI 48909
517 373-8481; fax 517 241-7966

To Whom It May Concern:

Enclosed please find one (1) microcomputer diskette containing toxic chemical release reporting information for:

EBW ELECTRONICS, INC.

This information is submitted as required under section 313 of the Emergency Planning and Community Right-to-Know Act of 1986 and the Pollution Prevention Act of 1990.

We are submitting a total of 1 chemical report(s) for our facility.

These 1 chemical report(s) are described below:

TRI Chemical or Chemical Category	Reporting Year	CAS Number	Report
Lead	2003	7439-92-1	Form R

Our technical point of contact is:

J CORY STEEBY
(616) 786-0575
CSTEEBY@EBW-ELECTRONICS.COM

and is available should any questions or problems arise in the processing of this diskette.

If the enclosed diskette contains one or more Form R chemicals, then I hereby certify that I have reviewed the enclosed documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report(s) are accurate based on reasonable estimates using data available to the preparers of this report(s).

If the enclosed diskette contains one or more Form A chemicals, then I hereby certify that to the best of my knowledge and belief, for each toxic chemical listed in the Form A statement, the annual reportable amount as defined in 40 CFR 372.27(a) did not exceed 500 pounds for this reporting year and that the chemical was manufactured, processed or otherwise used in an amount not exceeding 1 million pounds during the reporting year.

Sincerely,

NEW FACILITY
EBW ELECTRONICS, INC.

J CORY STEEBY
PRESIDENT

Enclosure: Diskette

State Diskette

Submission Checklist

	PLEASE CHECK AND COMPLETE EACH STEP BELOW:	**Complete?**
1.	The submission diskette is a new diskette. Older diskettes (for example, "recycled" diskettes) have caused upload problems in the past.	☐
2.	The diskette is a 3.5" high-density (1.44 MB) Windows-compatible diskette.	☐
3.	The diskette contains only files created by TRI-ME. Any other files on the diskette may cause the entire diskette to be rejected during the upload process into the Toxics Release Inventory System (TRIS).	☐
4.	The diskette has been virus-checked and it is virus free.	☐
5.	Attach a label to each diskette. The label should be in the following format:	☐

TRIS Report
(Your Company Name)

Date:	07-01-2003
Density:	HD
Report Year:	2003
Number:	1 of 1
Contact:	(Technical Contact Name) (Technical Contact Phone)

6.	**The certification letter is signed by a senior management official per EPCRA section 313(g)(1)(B).**	☐
7.	Use the correct address:	☐

Overnight Mail

Mr. Robert Jackson
Michigan Dept. of Environmental Quality
Environmental Science and Services Division
Constitution Hall, 1 North
525 West Allegan
Lansing, MI 48933

All Other Submissions

Mr. Robert Jackson
State Emergency Planning and Community Right-to-Know
Michigan Dept. of Environmental Quality
Environmental Science and Services Division
P.O. Box 30457
Lansing, MI 48909
517 373-8481; fax 517 241-7966

8.	**The envelope contains only the submission diskette and the signed certification letter. (Do not send paper forms with a diskette submission.)**	☐
9.	**The signed certification letter and diskette must be postmarked and mailed on or before July 1, 2004.**	☐

EPA
United States Environmental Protection Agency

FORM R

Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986, also known as Title III of the Superfund Amendments and Reauthorization Act

TRI Facility ID Number	NEW FACILITY
Toxic Chemical, Category or Generic Name	Lead

WHERE TO SEND COMPLETED FORMS: 1. TRI Data Processing Center P.O.Box 1513 Lanham, MD 20703-1513 2. APPROPRIATE STATE OFFICE (See instructions in Appendix F)

Enter "X" here if this is a revision: [ ]

For EPA use only

Important: See instructions to determine when "Not Applicable (NA)" boxes should be checked.

PART I. FACILITY IDENTIFICATION INFORMATION

SECTION 1. REPORTING YEAR 2003

SECTION 2. TRADE SECRET INFORMATION

2.1	Are you claiming the toxic chemical identified on page 2 trade secret? [ ] Yes (Answer question 2.2; Attach substantiation forms) [X] NO (Do not answer 2.2; Go to Section 3)	2.2	Is this copy [ ] Sanitized [ ] Unsanitized (Answer only if "YES" in 2.1)

SECTION 3. CERTIFICATION (Important: Read and sign after completing all form sections.)

I hereby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data availble to the preparers of this report.

Name and official title of owner/operator or senior management official:	Signature:	Date Signed:
J CORY STEEBY PRESIDENT		07/13/2006

SECTION 4. FACILITY IDENTIFICATION

4.1		TRI Facility ID Number	NEW FACILITY
Facility or Establishment Name	EBW ELECTRONICS, INC.	Facility or Establishment Name or Mailing Address (if different from street address)	
Street	701 COMMERCE CT	Mailing Address	NA
City/County/State/Zip Code	HOLLAND OTTAWA MI 49424	City/State/Zip Code	Country (Non-US

4.2	This report contains information for: (Important: check a or b; check c or d if applicable)	a. [X] An entire facility	b. [ ] Part of a facility	c. [ ] A Federal facility	d. [ ] GOCO		
4.3	Technical Contact Name	J CORY STEEBY			Telephone Number (include area code)	(616) 786-0575	
	Email Address	csteeby@ebw-electronics.com					
4.4	Public Contact Name	J CORY STEEBY			Telephone Number (include area code)	(616) 786-0575	
4.5	SIC Code (s) (4 digits)	Primary a. 3679	b.	c.	d.	e.	f.

4.6	Latitude	Degrees	Minutes	Seconds	Longitude	Degrees	Minutes	Seconds
		42	06	43		086	49	11

4.7 Dun & Bradstreet Number(s) (9 digits)	4.8 EPA Identification Number (RCRA I.D. No.) (12 characters)	4.9 Facility NPDES Permit Number(s) (9 characters)	4.10 Underground Injection Well Code (UIC) I.D. Number(s) (12 digits)
a. 799673603	a. NA	a. NA	a. NA
b.	b.	b.	b.

SECTION 5. PARENT COMPANY INFORMATION

5.1	Name of Parent Company	NA [X]	
5.2	Parent Company's Dun & Bradstreet Number	NA [X]	

EPA FORM R
PART II. CHEMICAL - SPECIFIC INFORMATION

TRI Facility ID Number
NEW FACILITY
Toxic Chemical, Category or Generic Name
Lead

SECTION 1. TOXIC CHEMICAL IDENTITY (Important: DO NOT complete this section if you completed Section 2 below.)

1.1	CAS Number (Important: Enter only one number exactly as it appears on the Section 313 list. Enter category code if reporting a chemical category.) 7439-92-1
1.2	Toxic Chemical or Chemical Category Name (Important: Enter only one name exactly as it appears on the Section 313 list.) Lead
1.3	Generic Chemical Name (Important: Complete only if Part 1, Section 2.1 is checked "Yes". Generic Name must be structurally descriptive.) NA

1.4 Distribution of Each Member of the Dioxin and Dioxin-like Compounds Category.
(If there are any numbers in boxes 1-17, then every field must be filled in with either 0 or some number between 0.01 and 100. Distribution should be reported in percentages and the total should equal 100%. If you do not have speciation data available, indicate NA.)

NA	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
☐																	

SECTION 2. MIXTURE COMPONENT IDENTITY (Important: DO NOT complete this section if you completed Section 1 above.)

2.1	Generic Chemical Name Provided by Supplier (Important: Maximum of 70 characters, including numbers, letters, spaces, and punctuation.) NA

SECTION 3. ACTIVITIES AND USES OF THE TOXIC CHEMICAL AT THE FACILITY
(Important: Check all that apply.)

3.1 Manufacture the toxic chemical:	3.2 Process the toxic chemical:	3.3 Otherwise use the toxic chemical:
a. ☐ Produce b. ☐ Import		
If produce or import:	a. ☐ As a reactant	a. ☐ As a chemical processing aid
c. ☐ For on-site use/processing	b. ☐ As a formulation component	b. ☐ As a manufacturing aid
d. ☐ For sale/distribution	c. ☒ As an article component	c. ☐ Ancillary or other use
e. ☐ As a byproduct	d. ☐ Repackaging	
f. ☐ As an impurity	e. ☐ As an impurity	

SECTION 4. MAXIMUM AMOUNT OF THE TOXIC CHEMICAL ONSITE AT ANY TIME DURING THE CALENDAR YEAR

4.1	02	(Enter two-digit code from instruction package.)

SECTION 5. QUANTITY OF THE TOXIC CHEMICAL ENTERING EACH ENVIRONMENTAL MEDIUM ONSITE

			A. Total Release (pounds/year*) (Enter range code or estimate**)	B. Basis of Estimate (enter code)	C. % From Stormwater
5.1	Fugitive or non-point air emissions	NA ☒			
5.2	Stack or point air emissions	NA ☐	0	O	
5.3	Discharges to receiving streams or water bodies (enter one name per box)				
	Stream or Water Body Name				
5.3.1	NA				
5.3.2					
5.3.3					

If additional pages of Part II, Section 5.3 are attached, indicate the total number of pages in this box ☐ and indicate the Part II, Section 5.3 page number in this box. ☐ (example: 1,2,3, etc.)

* For Dioxin or Dioxin-like compounds, report in grams/year

** Range Codes: A= 1- 10 pounds; B= 11- 499 pounds; C= 500 - 999 pounds.

EPA FORM R

PART II. CHEMICAL - SPECIFIC INFORMATION (CONTINUED)

TRI Facility ID Number	NEW FACILITY
Toxic Chemical, Category, or Generic Name	Lead

SECTION 5. QUANTITY OF THE TOXIC CHEMICAL ENTERING EACH ENVIRONMENTAL MEDIUM ONSITE (Continued)

		NA	A. Total Release (pounds/year*) (enter range code** or estimate)	B. Basis of Estimate (enter code)
5.4.1	Underground Injection onsite to Class I Wells	X		
5.4.2	Underground Injection onsite to Class II-V Wells	X		
5.5	Disposal to land onsite			
5.5.1.A	RCRA Subtitle C landfills	X		
5.5.1.B	Other landfills	X		
5.5.2	Land treatment/application farming	X		
5.5.3A	RCRA Subtitle C Surface Impoundments	X		
5.5.3B	Other surface impoundments	X		
5.5.4	Other disposal	X		

SECTION 6. TRANSFERS OF THE TOXIC CHEMICAL IN WASTES TO OFF-SITE LOCATIONS

6.1 DISCHARGES TO PUBLICLY OWNED TREATMENT WORKS (POTWs)

6.1.A Total Quantity Transferred to POTWs and Basis of Estimate

6.1.A.1. Total Transfers (pounds/year*) (enter range code** or estimate)	6.1.A.2 Basis of Estimate (enter code)
NA	

6.1.B. 1	POTW Name	NA					
POTW Address							
City		State		County		Zip	
6.1.B.	POTW Name						
POTW Address							
City		State		County		Zip	

If additional pages of Part II, Section 6.1 are attached, indicate the total number of pages in this box [ ] and indicate the Part II, Section 6.1 page number in this box [ ] (example: 1,2,3, etc.)

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS

6.2. 1 Off-Site EPA Identification Number (RCRA ID No.)	110000318772
Off-Site Location Name	ELECTRUM
Off-site Address	827 MARTIN

City	RAHWAY	State	NJ	County	UNION	Zip	07065	Country (Non-US)	

Is location under control of reporting facility or parent company? [ ] Yes [X] No

* For Dioxin or Dioxin-like compounds, report in grams/year

** Range Codes: A= 1- 10 pounds; B= 11- 499 pounds; C= 500 - 999 pounds.

EPA FORM R
PART II. CHEMICAL - SPECIFIC INFORMATION (CONTINUED)

TRI Facility ID Number	
NEW FACILITY	
Toxic Chemical, Category, or Generic Name	
Lead	

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS (Continued)

A. Total Transfers (pounds/year*) (enter range code** or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)
1. 1388	1. M	1. M24
2. NA	2.	2.
3.	3.	3.
4.	4.	4.

6.2. 2	Off-Site EPA Identification Number (RCRA ID No.)	110002025736	
Off-Site location Name	AUTUMN HILLS RDF		
Off-site Address	700 56TH AVENUE		

City	ZEELAND	State	MI	County	OTTAWA	Zip	49464	Country (Non-US)	

Is location under control of reporting facility or parent company? [ ] Yes [X] No

A. Total Transfers (pounds/year*) (enter range code** or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)
1. 0	1. O	1. M90
2. NA	2.	2.
3.	3.	3.
4.	4.	4.

SECTION 7A. ONSITE WASTE TREATMENT METHODS AND EFFICIENCY

[X] Not Applicable (NA) - Check here if no on-site waste treatment is applied to any waste stream containing the toxic chemical or chemical category.

a. General Waste Stream (enter code)	b. Waste Treatment Method(s) Sequence [enter 3-character code(s)]						c. Range of Influent Concentration	d. Waste Treatment Efficiency Estimate	e. Based on Operating Data ?
7A.1a	7A.1b	1		2			7A.1c	7A.1d	7A.1e
	3	4		5				%	Yes [ ] No [ ]
	6	7		8					
7A.2a	7A.2b	1		2			7A.2c	7A.2d	7A.2e
	3	4		5				%	Yes [ ] No [ ]
	6	7		8					
7A.3a	7A.3b	1		2			7A.3c	7A.3d	7A.3e
	3	4		5				%	Yes [ ] No [ ]
	6	7		8					
7A.4a	7A.4b	1		2			7A.4c	7A.4d	7A.4e
	3	4		5				%	Yes [ ] No [ ]
	6	7		8					
7A.5a	7A.5b	1		2			7A.5c	7A.5d	7A.5e
	3	4		5				%	Yes [ ] No [ ]
	6	7		8					

If additional pages of Part II, Section 6.2/7A are attached, indicate the total number of pages in this box [ ]
and indicate the Part II, Section 6.2/7A page number in this box: [ ] (example: 1,2,3, etc.)

* For Dioxin or Dioxin-like compounds, report in grams/year

** Range Codes: A= 1- 10 pounds; B= 11- 499 pounds; C= 500 - 999 pounds.

EPA FORM R
PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI Facility ID Number	
NEW FACILITY	
Toxic Chemical, Category, or Generic Name	
Lead	

SECTION 7B. ON-SITE ENERGY RECOVERY PROCESSES

[X] Not Applicable (NA) - Check here if no on-site energy recovery is applied to any waste stream containing the toxic chemical or chemical category.

Energy Recovery Methods [enter 3-character code(s)]

1 [ ] 2 [ ] 3 [ ]

SECTION 7C. ON-SITE RECYCLING PROCESSES

[X] Not Applicable (NA) - Check here if no on-site recyling is applied to any waste stream containing the toxic chemical or chemical category.

Recycling Methods [enter 3-character code(s)]

1 [ ] 2 [ ] 3 [ ] 4 [ ] 5 [ ]
6 [ ] 7 [ ] 8 [ ] 9 [ ] 10 [ ]

SECTION 8. SOURCE REDUCTION AND RECYCLING ACTIVITIES

		Column A Prior Year (pounds/year*)	Column B Current Reporting Year (pounds/year*)	Column C Following Year (pounds/year*)	Column D Second Following Year (pounds/year*)
8.1					
8.1a	Total on-site disposal to Class I Underground Injection Wells, RCRA Subtitle C landfills, and other landfills	NA	NA	NA	NA
8.1b	Total other on-site disposal or other releases	0	0	0	0
8.1c	Total off-site disposal to Class I Underground Injection Wells, RCRA Subtitle C landfills, and other landfills	0	NA	0	0
8.1d	Total other off-site disposal or other releases	0	0	0	0
8.2	Quantity used for energy recovery onsite	NA	NA	NA	NA
8.3	Quantity used for energy recovery offsite	NA	NA	NA	NA
8.4	Quantity recycled onsite	NA	NA	NA	NA
8.5	Quantity recycled offsite	1255	1388	1062	570
8.6	Quantity treated onsite	NA	NA	NA	NA
8.7	Quantity treated offsite	NA	NA	NA	NA
8.8	Quantity released to the environment as a result of remedial actions, catastrophic events, or one-time events not associated with productionprocesses (pounds/year)	NA			
8.9	Production ratio or activity index	1.00			

8.10	Did your facility engage in any source reduction activities for this chemical during the reporting year? If not, enter "NA" in Section 8.10.1 and answer Section 8.11.			
	Source Reduction Activities [enter code(s)]	Methods to Identify Activity (enter codes)		
8.10.1	NA	a.	b.	c.
8.10.2		a.	b.	c.
8.10.3		a.	b.	c.
8.10.4		a.	b.	c.
8.11	Is additional information on source reduction, recycling, or pollution control activities included with this report ? (Check one Box)			Yes [ ] No [X]

*For Dioxin or Dioxin-like compounds, report in grams/year

Signature Certification for U.S. EPA Diskette Submission

EBW ELECTRONICS, INC.
701 COMMERCE CT
HOLLAND, MI 49424
NEW FACILITY

July 13, 2006

TRI Data Processing Center
c/o Computer Sciences Corportation
Suite 300
8400 Corporate Drive
New Carrollton, MD 20785

(301) 429-5005

To Whom It May Concern:

Enclosed please find one (1) microcomputer diskette containing toxic chemical release reporting information for:

EBW ELECTRONICS, INC.

This information is submitted as required under section 313 of the Emergency Planning and Community Right-to-Know Act of 1986 and the Pollution Prevention Act of 1990.

We are submitting a total of 1 chemical report(s) for our facility.

These 1 chemical report(s) are described below:

TRI Chemical or Chemical Category	Reporting Year	CAS Number	Report
Lead	2002	7439-92-1	Form R

Our technical point of contact is:

J CORY STEEBY
(616) 786-0575
CSTEEBY@EBW-ELECTRONICS.COM

and is available should any questions or problems arise in the processing of this diskette.

If the enclosed diskette contains one or more Form R chemicals, then I hereby certify that I have reviewed the enclosed documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report(s) are accurate based on reasonable estimates using data available to the preparers of this report(s).

If the enclosed diskette contains one or more Form A chemicals, then I hereby certify that to the best of my knowledge and belief, for each toxic chemical listed in the Form A statement, the annual reportable amount as defined in 40 CFR 372.27(a) did not exceed 500 pounds for this reporting year and that the chemical was manufactured, processed or otherwise used in an amount not exceeding 1 million pounds during the reporting year.

Sincerely,

J CORY STEEBY
PRESIDENT

Enclosure: Diskette

U.S. EPA Diskette

Submission Checklist

	PLEASE CHECK AND COMPLETE EACH STEP BELOW:	Complete?
1.	The submission diskette is a new diskette. Older diskettes (for example, "recycled" diskettes) have caused upload problems in the past.	☐
2.	The diskette is a 3.5" high-density (1.44 MB) Windows-compatible diskette.	☐
3.	The diskette contains only files created by TRI-ME. Any other files on the diskette may cause the entire diskette to be rejected during the upload process into the Toxics Release Inventory System (TRIS).	☐
4.	The diskette has been virus-checked and it is virus free.	☐
5.	Attach a label to each diskette. The label should be in the following format:	☐

TRIS Report
(Your Company Name)

Date:	07-01-2003
Density:	HD
Report Year:	2002
Number:	1 of 1
Contact:	(Technical Contact Name) (Technical Contact Phone)

6.	**The certification letter is signed by a senior management official per EPCRA section 313(g)(1)(B).**	☐
7.	Use the correct address:	☐

Certified mail, overnight mail, or hand-delivered

TRI Data Processing Center
c/o Computer Sciences Corportation
Suite 300
8400 Corporate Drive
New Carrollton, MD 20785

(301) 429-5005

All other submissions

TRI Data Processing Center
P.O. Box 1513
Lanham, MD 20703-1513

8.	**The envelope contains only the submission diskette and the signed certification letter. (Do not send paper forms with a diskette submission.)**	☐
9.	**Mail the signed certification letter and diskette on or before July 1, 2003.**	☐

File Copy -- Do Not Submit to EPA

EPA United States Environmental Protection Agency

FORM R TOXIC CHEMICAL RELEASE INVENTORY REPORTING FORM

Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986, also known as Title III of the Superfund Amendments and Reauthorization Act

WHERE TO SEND COMPLETED FORMS: 1. TRI Data Processing Center, P.O.Box 1513, Lantham, MD 20703-1513 2. APPROPRIATE STATE OFFICE (See instructions in Appendix F)

Enter "X" here if this is a revision: [ ]

For EPA use only

Important: See instructions to determine when "Not Applicable (NA)" boxes should be checked.

PART I. FACILITY IDENTIFICATION INFORMATION

SECTION 1. REPORTING YEAR 2002

SECTION 2. TRADE SECRET INFORMATION

2.1	Are you claiming the toxic chemical identified on page 2 trade secret? [ ] Yes (Answer question 2.2; Attach substantiation forms) [X] NO (Do not answer 2.2; Go to Section 3)	2.2	Is this copy [ ] Sanitized [ ] Unsanitized (Answer only if "YES" in 2.1)

SECTION 3. CERTIFICATION (Important: Read and sign after completing all form sections.)

I hereby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data availble to the preparers of this report.

Name and official title of owner/operator or senior management official:	Signature:	Date Signed:
J CORY STEEBY PRESIDENT		07/13/2006

SECTION 4. FACILITY IDENTIFICATION

4.1		TRI Facility ID Number	NEW FACILITY
Facility or Establishment Name	EBW ELECTRONICS, INC.	Facility or Establishment Name or Mailing Address (if different from street address)	
Street	701 COMMERCE CT	Mailing Address	NA
City/County/State/Zip Code	HOLLAND OTTAWA MI 49424	City/State/Zip Code	Country (Non-US)

4.2	This report contains information for: (Important: check a or b; check c or d if applicable)	a. [X] An entire facility	b. [ ] Part of a facility	c. [ ] A Federal facility	d. [ ] GOCO	
4.3	Technical Contact Name	J CORY STEEBY		Telephone Number (include area code)	(616) 786-0575	
	Email Address	csteeby@ebw-electronics.com				
4.4	Public Contact Name	J CORY STEEBY		Telephone Number (include area code)	(616) 786-0575	

4.5	SIC Code (s) (4 digits)	Primary a. 3679	b.	c.	d.	e.	f.

4.6	Latitude	Degrees	Minutes	Seconds	Longitude	Degrees	Minutes	Seconds
		42	06	43		086	49	11

4.7 Dun & Bradstreet Number(s) (9 digits)	4.8 EPA Identification Number (RCRA I.D. No.) (12 characters)	4.9 Facility NPDES Permit Number(s) (9 characters)	4.10 Underground Injection Well Code (UIC) I.D. Number(s) (12 digits)
a. 799673603	a. NA	a. NA	a. NA
b.	b.	b.	b.

SECTION 5. PARENT COMPANY INFORMATION

5.1	Name of Parent Company	NA [X]	
5.2	Parent Company's Dun & Bradstreet Number	NA [X]	

Copy -- Do Not Submit to

EPA FORM R

PART II. CHEMICAL - SPECIFIC INFORMATION

TRI Facility ID Number	NEW FACILITY
Toxic Chemical, Category or Generic Name	Lead

SECTION 1. TOXIC CHEMICAL IDENTITY

(Important: DO NOT complete this section if you completed Section 2 below.)

1.1	CAS Number (Important: Enter only one number exactly as it appears on the Section 313 list. Enter category code if reporting a chemical category.) 7439-92-1
1.2	Toxic Chemical or Chemical Category Name (Important: Enter only one name exactly as it appears on the Section 313 list.) Lead
1.3	Generic Chemical Name (Important: Complete only if Part 1, Section 2.1 is checked "Yes". Generic Name must be structurally descriptive.) NA

1.4 Distribution of Each Member of the Dioxin and Dioxin-like Compounds Category.
(If there are any numbers in boxes 1-17, then every field must be filled in with either 0 or some number between 0.01 and 100. Distribution should be reported in percentages and the total should equal 100%. If you do not have speciation data available, indicate NA.)

NA	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
☐																	

SECTION 2. MIXTURE COMPONENT IDENTITY

(Important: DO NOT complete this section if you completed Section 1 above.)

2.1	Generic Chemical Name Provided by Supplier (Important: Maximum of 70 characters, including numbers, letters, spaces, and punctuation.) NA

SECTION 3. ACTIVITIES AND USES OF THE TOXIC CHEMICAL AT THE FACILITY

(Important: Check all that apply.)

3.1 Manufacture the toxic chemical:	3.2 Process the toxic chemical:	3.3 Otherwise use the toxic chemical:
a. ☐ Produce b. ☐ Import		
If produce or import:	a. ☐ As a reactant	a. ☐ As a chemical processing aid
c. ☐ For on-site use/processing	b. ☐ As a formulation component	b. ☐ As a manufacturing aid
d. ☐ For sale/distribution	c. ☒ As an article component	c. ☐ Ancillary or other use
e. ☐ As a byproduct	d. ☐ Repackaging	
f. ☐ As an impurity	e. ☐ As an impurity	

SECTION 4. MAXIMUM AMOUNT OF THE TOXIC CHEMICAL ONSITE AT ANY TIME DURING THE CALENDAR YEAR

4.1 02 (Enter two-digit code from instruction package.)

SECTION 5. QUANTITY OF THE TOXIC CHEMICAL ENTERING EACH ENVIRONMENTAL MEDIUM ONSITE

			A. Total Release (pounds/year*) (Enter range code or estimate**)	B. Basis of Estimate (enter code)	C. % From Stormwater
5.1	Fugitive or non-point air emissions	NA ☒			
5.2	Stack or point air emissions	NA ☐	0	O	
5.3	Discharges to receiving streams or water bodies (enter one name per box)				
	Stream or Water Body Name				
5.3.1	NA				
5.3.2					
5.3.3					

If additional pages of Part II, Section 5.3 are attached, indicate the total number of pages in this box ☐
and indicate the Part II, Section 5.3 page number in this box. ☐ **(example: 1,2,3, etc.)**

* For Dioxin or Dioxin-like compounds, report in grams/year

** Range Codes: A= 1- 10 pounds; B= 11- 499 pounds; C= 500 - 999 pounds.

Copy -- Do Not Submit to

EPA FORM R

PART II. CHEMICAL - SPECIFIC INFORMATION (CONTINUED)

TRI Facility ID Number	NEW FACILITY
Toxic Chemical, Category, or Generic Name	Lead

SECTION 5. QUANTITY OF THE TOXIC CHEMICAL ENTERING EACH ENVIRONMENTAL MEDIUM ONSITE (Continued)

		NA	A. Total Release (pounds/year*) (enter range code** or estimate)	B. Basis of Estimate (enter code)
5.4.1	Underground Injection onsite to Class I Wells	X		
5.4.2	Underground Injection onsite to Class II-V Wells	X		
5.5	Disposal to land onsite			
5.5.1.A	RCRA Subtitle C landfills	X		
5.5.1.B	Other landfills	X		
5.5.2	Land treatment/application farming	X		
5.5.3	Surface Impoundment	X		
5.5.4	Other disposal	X		

SECTION 6. TRANSFERS OF THE TOXIC CHEMICAL IN WASTES TO OFF-SITE LOCATIONS

6.1 DISCHARGES TO PUBLICLY OWNED TREATMENT WORKS (POTWs)

6.1.A Total Quantity Transferred to POTWs and Basis of Estimate

6.1.A.1. Total Transfers (pounds/year*) (enter range code** or estimate)	6.1.A.2 Basis of Estimate (enter code)
NA	

6.1.B. 1	POTW Name	NA					
POTW Address							
City		State		County		Zip	
6.1.B.	POTW Name						
POTW Address							
City		State		County		Zip	

If additional pages of Part II, Section 6.1 are attached, indicate the total number of pages in this box [ ] and indicate the Part II, Section 6.1 page number in this box [ ] (example: 1,2,3, etc.)

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS

6.2. 1 Off-Site EPA Identification Number (RCRA ID No.)	110000318772
Off-Site Location Name	ELECTRUM
Off-site Address	827 MARTIN

City	RAHWAY	State	NJ	County	UNION	Zip	07065	Country (Non-US)	

Is location under control of reporting facility or parent company? [ ] Yes [X] No

* For Dioxin or Dioxin-like compounds, report in grams/year

** Range Codes: A= 1- 10 pounds; B= 11- 499 pounds; C= 500 - 999 pounds.

Copy -- Do Not Submit to

EPA FORM R

PART II, CHEMICAL - SPECIFIC INFORMATION (CONTINUED)

TRI Facility ID Number	
NEW FACILITY	
Toxic Chemical, Category, or Generic Name	
Lead	

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS (Continued)

A. Total Transfers (pounds/year*) (enter range code** or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)
1. 1255	1. M	1. M24
2. NA	2.	2.
3.	3.	3.
4.	4.	4.

6.2. 2 Off-Site EPA Identification Number (RCRA ID No.) 110002025736

Off-Site location Name: AUTUMN HILLS RDF

Off-site Address: 700 56TH AVENUE

City	ZEELAND	State	MI	County	OTTAWA	Zip	49464	Country (Non-US)	

Is location under control of reporting facility or parent company? [ ] Yes [X] No

A. Total Transfers (pounds/year*) (enter range code** or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)
1. 0	1. O	1. M90
2. NA	2.	2.
3.	3.	3.
4.	4.	4.

SECTION 7A. ONSITE WASTE TREATMENT METHODS AND EFFICIENCY

[X] Not Applicable (NA) - Check here if no on-site waste treatment is applied to any waste stream containing the toxic chemical or chemical category.

a. General Waste Stream (enter code)	b. Waste Treatment Method(s) Sequence [enter 3-character code(s)]						c. Range of Influent Concentration	d. Waste Treatment Efficiency Estimate	e. Based on Operating Data ?
7A.1a	7A.1b	1		2			7A.1c	7A.1d	7A.1e
	3	4		5				%	Yes [ ] No [ ]
	6	7		8					
7A.2a	7A.2b	1		2			7A.2c	7A.2d	7A.2e
	3	4		5				%	Yes [ ] No [ ]
	6	7		8					
7A.3a	7A.3b	1		2			7A.3c	7A.3d	7A.3e
	3	4		5				%	Yes [ ] No [ ]
	6	7		8					
7A.4a	7A.4b	1		2			7A.4c	7A.4d	7A.4e
	3	4		5				%	Yes [ ] No [ ]
	6	7		8					
7A.5a	7A.5b	1		2			7A.5c	7A.5d	7A.5e
	3	4		5				%	Yes [ ] No [ ]
	6	7		8					

If additional pages of Part II, Section 6.2/7A are attached, indicate the total number of pages in this box [ ]
and indicate the Part II, Section 6.2/7A page number in this box: [ ] **(example: 1,2,3, etc.)**

* For Dioxin or Dioxin-like compounds, report in grams/year

** Range Codes: A= 1- 10 pounds; B= 11- 499 pounds; C= 500 - 999 pounds.

Copy -- Do Not Submit to

EPA FORM R
PART II CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI Facility ID Number	
NEW FACILITY	
Toxic Chemical, Category, or Generic Name	
Lead	

SECTION 7B. ON-SITE ENERGY RECOVERY PROCESSES

[X] Not Applicable (NA) - Check here if no on-site energy recovery is applied to any waste stream containing the toxic chemical or chemical category.

Energy Recovery Methods [enter 3-character code(s)]

1 [ ] 2 [ ] 3 [ ] 4 [ ]

SECTION 7C. ON-SITE RECYCLING PROCESSES

[X] Not Applicable (NA) - Check here if no on-site recyling is applied to any waste stream containing the toxic chemical or chemical category.

Recycling Methods [enter 3-character code(s)]

1 [ ] 2 [ ] 3 [ ] 4 [ ] 5 [ ]
6 [ ] 7 [ ] 8 [ ] 9 [ ] 10 [ ]

SECTION 8. SOURCE REDUCTION AND RECYCLING ACTIVITIES

		Column A Prior Year (pounds/year*)	Column B Current Reporting Year (pounds/year*)	Column C Following Year (pounds/year*)	Column D Second Following Year (pounds/year*)
8.1	Quantity released ***	0	0	0	0
8.2	Quantity used for energy recovery onsite	NA	NA	NA	NA
8.3	Quantity used for energy recovery offsite	NA	NA	NA	NA
8.4	Quantity recycled onsite	NA	NA	NA	NA
8.5	Quantity recycled offsite	135	1255	1388	1062
8.6	Quantity treated onsite	NA	NA	NA	NA
8.7	Quantity treated offsite	NA	NA	NA	NA
8.8	Quantity released to the environment as a result of remedial actions, catastrophic events, or one-time events not associated with production processes (pounds/year)			NA	
8.9	Production ratio or activity index			1.00	

8.10 Did your facility engage in any source reduction activities for this chemical during the reporting year? If not, enter "NA" in Section 8.10.1 and answer Section 8.11.

	Source Reduction Activities [enter code(s)]	Methods to Identify Activity (enter codes)		
8.10.1	NA	a.	b.	c.
8.10.2		a.	b.	c.
8.10.3		a.	b.	c.
8.10.4		a.	b.	c.

		Yes	No
8.11	Is additional information on source reduction, recycling, or pollution control activities included with this report ? (Check one Box)	[ ]	[X]

*For Dioxin or Dioxin-like compounds, report in grams/year

***Report releases pursuant to EPCRA Section 329 (8) including "any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment." Do not include any quantity treated onsite.

Signature Certification for State Diskette Submission

EBW ELECTRONICS, INC.
701 COMMERCE CT
HOLLAND, MI 49424
NEW FACILITY

July 13, 2006

Mr. Robert Jackson
State Emergency Planning and Community Right-to-Know
Michigan Dept. of Environmental Quality
Environmental Science and Services Division
P.O. Box 30457
Lansing, MI 48909
517 373-8481; fax 517 241-7966

To Whom It May Concern:

Enclosed please find one (1) microcomputer diskette containing toxic chemical release reporting information for:

EBW ELECTRONICS, INC.

This information is submitted as required under section 313 of the Emergency Planning and Community Right-to-Know Act of 1986 and the Pollution Prevention Act of 1990.

We are submitting a total of 1 chemical report(s) for our facility.

These 1 chemical report(s) are described below:

TRI Chemical or Chemical Category	Reporting Year	CAS Number	Report
Lead	2002	7439-92-1	Form R

Our technical point of contact is:

J CORY STEEBY
(616) 786-0575
CSTEEBY@EBW-ELECTRONICS.COM

and is available should any questions or problems arise in the processing of this diskette.

If the enclosed diskette contains one or more Form R chemicals, then I hereby certify that I have reviewed the enclosed documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report(s) are accurate based on reasonable estimates using data available to the preparers of this report(s).

If the enclosed diskette contains one or more Form A chemicals, then I hereby certify that to the best of my knowledge and belief, for each toxic chemical listed in the Form A statement, the annual reportable amount as defined in 40 CFR 372.27(a) did not exceed 500 pounds for this reporting year and that the chemical was manufactured, processed or otherwise used in an amount not exceeding 1 million pounds during the reporting year.

Sincerely,

J CORY STEEBY
PRESIDENT

Enclosure: Diskette

State Diskette

Submission Checklist

	PLEASE CHECK AND COMPLETE EACH STEP BELOW:	**Complete?**
1.	The submission diskette is a new diskette. Older diskettes (for example, "recycled" diskettes) have caused upload problems in the past.	☐
2.	The diskette is a 3.5" high-density (1.44 MB) Windows-compatible diskette.	☐
3.	The diskette contains only files created by TRI-ME. Any other files on the diskette may cause the entire diskette to be rejected during the upload process into the Toxics Release Inventory System (TRIS).	☐
4.	The diskette has been virus-checked and it is virus free.	☐
5.	Attach a label to each diskette. The label should be in the following format:	☐

TRIS Report
(Your Company Name)

Date:	07-01-2003
Density:	HD
Report Year:	2002
Number:	1 of 1
Contact:	(Technical Contact Name)
	(Technical Contact Phone)

6.	**The certification letter is signed by a senior management official per EPCRA section 313(g)(1)(B).**	☐
7.	Use the correct address:	☐

Overnight Mail

Mr. Robert Jackson
Michigan Dept. of Environmental Quality
Environmental Science and Services Division
Constitution Hall, 1 North
525 West Allegan
Lansing, MI 48933

All Other Submissions

Mr. Robert Jackson
State Emergency Planning and Community Right-to-Know
Michigan Dept. of Environmental Quality
Environmental Science and Services Division
P.O. Box 30457
Lansing, MI 48909
517 373-8481; fax 517 241-7966

8.	**The envelope contains only the submission diskette and the signed certification letter. (Do not send paper forms with a diskette submission.)**	☐
9.	**Mail the signed certification letter and diskette on or before July 1, 2003.**	☐

EPA
United States Environmental Protection Agency

FORM R

TOXIC CHEMICAL RELEASE INVENTORY REPORTING FORM

Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986, also known as Title III of the Superfund Amendments and Reauthorization Act

WHERE TO SEND COMPLETED FORMS: 1. TRI Data Processing Center P.O.Box 1513 Lantham, MD 20703-1513 2. APPROPRIATE STATE OFFICE (See instructions in Appendix F)

Enter "X" here if this is a revision

For EPA use only

Important: See instructions to determine when "Not Applicable (NA)" boxes should be checked.

PART I. FACILITY IDENTIFICATION INFORMATION

SECTION 1. REPORTING YEAR 2002

SECTION 2. TRADE SECRET INFORMATION

2.1	Are you claiming the toxic chemical identified on page 2 trade secret? [ ] Yes (Answer question 2.2; Attach substantiation forms) [X] NO (Do not answer 2.2; Go to Section 3)	2.2	Is this copy [ ] Sanitized [ ] Unsanitized (Answer only if "YES" in 2.1)

SECTION 3. CERTIFICATION (Important: Read and sign after completing all form sections.)

I hereby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data availble to the preparers of this report.

Name and official title of owner/operator or senior management official:	Signature:	Date Signed:
J CORY STEEBY PRESIDENT		07/13/2006

SECTION 4. FACILITY IDENTIFICATION

4.1		TRI Facility ID Number	NEW FACILITY
Facility or Establishment Name	EBW ELECTRONICS, INC.	Facility or Establishment Name or Mailing Address (if different from street address)	
Street	701 COMMERCE CT	Mailing Address	NA
City/County/State/Zip Code	HOLLAND OTTAWA MI 49424	City/State/Zip Code	Country (Non-US)

4.2	This report contains information for: (Important: check a or b; check c or d if applicable)	a. [X] An entire facility	b. [ ] Part of a facility	c. [ ] A Federal facility	d. [ ] GOCO	
4.3	Technical Contact Name	J CORY STEEBY		Telephone Number (include area code)	(616) 786-0575	
	Email Address	csteeby@ebw-electronics.com				
4.4	Public Contact Name	J CORY STEEBY		Telephone Number (include area code)	(616) 786-0575	

4.5	SIC Code (s) (4 digits)	Primary a. 3679	b.	c.	d.	e.	f.

4.6	Latitude	Degrees	Minutes	Seconds	Longitude	Degrees	Minutes	Seconds
		42	06	43		086	49	11

4.7 Dun & Bradstreet Number(s) (9 digits)	4.8 EPA Identification Number (RCRA I.D. No.) (12 characters)	4.9 Facility NPDES Permit Number(s) (9 characters)	4.10 Underground Injection Well Code (UIC) I.D. Number(s) (12 digits)
a. 799673603	a. NA	a. NA	a. NA
b.	b.	b.	b.

SECTION 5. PARENT COMPANY INFORMATION

5.1	Name of Parent Company	NA [X]	
5.2	Parent Company's Dun & Bradstreet Number	NA [X]	

EPA FORM R
PART II. CHEMICAL - SPECIFIC INFORMATION

TRI Facility ID Number
NEW FACILITY
Toxic Chemical, Category or Generic Name
Lead

SECTION 1. TOXIC CHEMICAL IDENTITY (Important: DO NOT complete this section if you completed Section 2 below.)

1.1	CAS Number (Important: Enter only one number exactly as it appears on the Section 313 list. Enter category code if reporting a chemical category.) 7439-92-1
1.2	Toxic Chemical or Chemical Category Name (Important: Enter only one name exactly as it appears on the Section 313 list.) Lead
1.3	Generic Chemical Name (Important: Complete only if Part 1, Section 2.1 is checked "Yes". Generic Name must be structurally descriptive.) NA

1.4 Distribution of Each Member of the Dioxin and Dioxin-like Compounds Category.
(If there are any numbers in boxes 1-17, then every field must be filled in with either 0 or some number between 0.01 and 100. Distribution should be reported in percentages and the total should equal 100%. If you do not have speciation data available, indicate NA.)

NA ☐	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17

SECTION 2. MIXTURE COMPONENT IDENTITY (Important: DO NOT complete this section if you completed Section 1 above.)

2.1	Generic Chemical Name Provided by Supplier (Important: Maximum of 70 characters, including numbers, letters, spaces, and punctuation.) NA

SECTION 3. ACTIVITIES AND USES OF THE TOXIC CHEMICAL AT THE FACILITY
(Important: Check all that apply.)

3.1 Manufacture the toxic chemical:	3.2 Process the toxic chemical:	3.3 Otherwise use the toxic chemical:
a. ☐ Produce b. ☐ Import		
If produce or import:	a. ☐ As a reactant	a. ☐ As a chemical processing aid
c. ☐ For on-site use/processing	b. ☐ As a formulation component	b. ☐ As a manufacturing aid
d. ☐ For sale/distribution	c. ☒ As an article component	c. ☐ Ancillary or other use
e. ☐ As a byproduct	d. ☐ Repackaging	
f. ☐ As an impurity	e. ☐ As an impurity	

SECTION 4. MAXIMUM AMOUNT OF THE TOXIC CHEMICAL ONSITE AT ANY TIME DURING THE CALENDAR YEAR

4.1	02	(Enter two-digit code from instruction package.)

SECTION 5. QUANTITY OF THE TOXIC CHEMICAL ENTERING EACH ENVIRONMENTAL MEDIUM ONSITE

			A. Total Release (pounds/year*) (Enter range code or estimate**)	B. Basis of Estimate (enter code)	C. % From Stormwater
5.1	Fugitive or non-point air emissions	NA ☒			
5.2	Stack or point air emissions	NA ☐	0	O	
5.3	Discharges to receiving streams or water bodies (enter one name per box)				
	Stream or Water Body Name				
5.3.1	NA				
5.3.2					
5.3.3					

If additional pages of Part II, Section 5.3 are attached, indicate the total number of pages in this box ☐
and indicate the Part II, Section 5.3 page number in this box. ☐ **(example: 1,2,3, etc.)**

* For Dioxin or Dioxin-like compounds, report in grams/year
** Range Codes: A= 1- 10 pounds; B= 11- 499 pounds; C= 500 - 999 pounds.

EPA FORM R

PART II. CHEMICAL - SPECIFIC INFORMATION (CONTINUED)

TRI Facility ID Number	NEW FACILITY
Toxic Chemical, Category, or Generic Name	Lead

SECTION 5. QUANTITY OF THE TOXIC CHEMICAL ENTERING EACH ENVIRONMENTAL MEDIUM ONSITE (Continued)

		NA	A. Total Release (pounds/year*) (enter range code** or estimate)	B. Basis of Estimate (enter code)
5.4.1	Underground Injection onsite to Class I Wells	X		
5.4.2	Underground Injection onsite to Class II-V Wells	X		
5.5	Disposal to land onsite			
5.5.1.A	RCRA Subtitle C landfills	X		
5.5.1.B	Other landfills	X		
5.5.2	Land treatment/application farming	X		
5.5.3	Surface Impoundment	X		
5.5.4	Other disposal	X		

SECTION 6. TRANSFERS OF THE TOXIC CHEMICAL IN WASTES TO OFF-SITE LOCATIONS

6.1 DISCHARGES TO PUBLICLY OWNED TREATMENT WORKS (POTWs)

6.1.A Total Quantity Transferred to POTWs and Basis of Estimate

6.1.A.1. Total Transfers (pounds/year*) (enter range code** or estimate)	6.1.A.2 Basis of Estimate (enter code)
NA	

6.1.B. 1	POTW Name	NA					
POTW Address							
City		State		County		Zip	
6.1.B.	POTW Name						
POTW Address							
City		State		County		Zip	

If additional pages of Part II, Section 6.1 are attached, indicate the total number of pages in this box [ ] and indicate the Part II, Section 6.1 page number in this box [ ] (example: 1,2,3, etc.)

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS

6.2. 1	Off-Site EPA Identification Number (RCRA ID No.)	110000318772						
Off-Site Location Name	ELECTRUM							
Off-site Address	827 MARTIN							
City	RAHWAY	State	NJ	County	UNION	Zip	07065	Country (Non-US)

Is location under control of reporting facility or parent company? [ ] Yes [X] No

* For Dioxin or Dioxin-like compounds, report in grams/year

** Range Codes: A= 1- 10 pounds; B= 11- 499 pounds; C= 500 - 999 pounds.

EPA FORM R
PART II. CHEMICAL - SPECIFIC INFORMATION (CONTINUED)

TRI Facility ID Number	
NEW FACILITY	
Toxic Chemical, Category, or Generic Name	
Lead	

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS (Continued)

A. Total Transfers (pounds/year*) (enter range code** or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)
1. 1255	1. M	1. M24
2. NA	2.	2.
3.	3.	3.
4.	4.	4.

6.2. 2 Off-Site EPA Identification Number (RCRA ID No.) 110002025736

Off-Site location Name	AUTUMN HILLS RDF
Off-site Address	700 56TH AVENUE

City	ZEELAND	State	MI	County	OTTAWA	Zip	49464	Country (Non-US)	

Is location under control of reporting facility or parent company? [ ] Yes [X] No

A. Total Transfers (pounds/year*) (enter range code** or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)
1. 0	1. O	1. M90
2. NA	2.	2.
3.	3.	3.
4.	4.	4.

SECTION 7A. ONSITE WASTE TREATMENT METHODS AND EFFICIENCY

[X] Not Applicable (NA) - Check here if no on-site waste treatment is applied to any waste stream containing the toxic chemical or chemical category.

a. General Waste Stream (enter code)	b. Waste Treatment Method(s) Sequence [enter 3-character code(s)]	c. Range of Influent Concentration	d. Waste Treatment Efficiency Estimate	e. Based on Operating Data ?
7A.1a	7A.1b 1 2 3 4 5 6 7 8	7A.1c	7A.1d %	7A.1e Yes [ ] No [ ]
7A.2a	7A.2b 1 2 3 4 5 6 7 8	7A.2c	7A.2d %	7A.2e Yes [ ] No [ ]
7A.3a	7A.3b 1 2 3 4 5 6 7 8	7A.3c	7A.3d %	7A.3e Yes [ ] No [ ]
7A.4a	7A.4b 1 2 3 4 5 6 7 8	7A.4c	7A.4d %	7A.4e Yes [ ] No [ ]
7A.5a	7A.5b 1 2 3 4 5 6 7 8	7A.5c	7A.5d %	7A.5e Yes [ ] No [ ]

If additional pages of Part II, Section 6.2/7A are attached, indicate the total number of pages in this box [ ]
and indicate the Part II, Section 6.2/7A page number in this box: [ ] (example: 1,2,3, etc.)

* For Dioxin or Dioxin-like compounds, report in grams/year

** Range Codes: A= 1- 10 pounds; B= 11- 499 pounds; C= 500 - 999 pounds.

EPA FORM R
PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI Facility ID Number	
NEW FACILITY	
Toxic Chemical, Category, or Generic Name	
Lead	

SECTION 7B. ON-SITE ENERGY RECOVERY PROCESSES

[X] Not Applicable (NA) - Check here if no on-site energy recovery is applied to any waste stream containing the toxic chemical or chemical category.

Energy Recovery Methods [enter 3-character code(s)]

1 [ ] 2 [ ] 3 [ ] 4 [ ]

SECTION 7C. ON-SITE RECYCLING PROCESSES

[X] Not Applicable (NA) - Check here if no on-site recyling is applied to any waste stream containing the toxic chemical or chemical category.

Recycling Methods [enter 3-character code(s)]

1 [ ] 2 [ ] 3 [ ] 4 [ ] 5 [ ]
6 [ ] 7 [ ] 8 [ ] 9 [ ] 10 [ ]

SECTION 8. SOURCE REDUCTION AND RECYCLING ACTIVITIES

		Column A Prior Year (pounds/year*)	Column B Current Reporting Year (pounds/year*)	Column C Following Year (pounds/year*)	Column D Second Following Year (pounds/year*)
8.1	Quantity released ***	0	0	0	0
8.2	Quantity used for energy recovery onsite	NA	NA	NA	NA
8.3	Quantity used for energy recovery offsite	NA	NA	NA	NA
8.4	Quantity recycled onsite	NA	NA	NA	NA
8.5	Quantity recycled offsite	135	1255	1388	1062
8.6	Quantity treated onsite	NA	NA	NA	NA
8.7	Quantity treated offsite	NA	NA	NA	NA
8.8	Quantity released to the environment as a result of remedial actions, catastrophic events, or one-time events not associated with production processes (pounds/year)			NA	
8.9	Production ratio or activity index			1.00	

8.10	Did your facility engage in any source reduction activities for this chemical during the reporting year? If not, enter "NA" in Section 8.10.1 and answer Section 8.11.			
	Source Reduction Activities [enter code(s)]	Methods to Identify Activity (enter codes)		
8.10.1	NA	a.	b.	c.
8.10.2		a.	b.	c.
8.10.3		a.	b.	c.
8.10.4		a.	b.	c.
8.11	Is additional information on source reduction, recycling, or pollution control activities included with this report ? (Check one Box)			Yes [ ] No [X]

*For Dioxin or Dioxin-like compounds, report in grams/year

***Report releases pursuant to EPCRA Section 329 (8) including "any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment." Do not include any quantity treated onsite.

Signature Certification for Internet Using CDX Submission

CDX

EBW Electronics, Inc.
13110 Ransom ST
Holland, MI 49424
New Facility

July 10, 2006

CDX Confirmation Number:
TRI00012006071013235 5corysteeby

TRI Data Processing Center
c/o Computer Sciences Corportation
Suite 300
8400 Corporate Drive
Landover, MD 20785

(301) 429-5005

To Whom It May Concern:

This letter contains toxic chemical release reporting information previously submitted via the internet using CDX for:

EBW Electronics, Inc.

This information is submitted as required under section 313 of the Emergency Planning and Community Right-to-Know Act of 1986 and the Pollution Prevention Act of 1990.

We are submitting a total of 1 chemical report(s) for our facility.

These 1 chemical report(s) are described below:

TRI Chemical or Chemical Category	Reporting Year	CAS Number	Report
Lead	2005	7439-92-1	Form R

Our technical point of contact is:

J Cory Steeby
(616) 786-0575
csteeby@ebw-electronics.com

and is available should any questions or problems arise in the processing of the electronic data submission.

If the submission contains one or more Form R chemicals, then I hereby certify that I have reviewed the enclosed documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report(s) are accurate based on reasonable estimates using data available to the preparers of this report(s).

If the submission contains one or more Form A chemicals, then I hereby certify that to the best of my knowledge and belief, for each toxic chemical listed in the Form A statement, the annual reportable amount as defined in 40 CFR 372.27(a) did not exceed 500 pounds for this reporting year and that the chemical was manufactured, processed or otherwise used in an amount not exceeding 1 million pounds during the reporting year.

Sincerely,

J Cory Steeby
president

7.10.06
Revision

Signature Certification for State Diskette Submission

DISK

EBW ELECTRONICS, INC.
13110 RANSOM ST
HOLLAND, MI 49424
NEW FACILITY

July 10, 2006

Robert Jackson
MDEQ ESSD
Constitution Hall, 1 North
525 West Allegan
Lansing, MI 48933

To Whom It May Concern:

Enclosed please find one (1) microcomputer diskette containing toxic chemical release reporting information for:

EBW ELECTRONICS, INC.

This information is submitted as required under section 313 of the Emergency Planning and Community Right-to-Know Act of 1986 and the Pollution Prevention Act of 1990.

We are submitting a total of 1 chemical report(s) for our facility.

These 1 chemical report(s) are described below:

TRI Chemical or Chemical Category	Reporting Year	CAS Number	Report
Lead	2005	7439-92-1	Form R

Our technical point of contact is:

J CORY STEEBY
(616) 786-0575
CSTEEBY@EBW-ELECTRONICS.COM

and is available should any questions or problems arise in the processing of this diskette.

If the enclosed diskette contains one or more Form R chemicals, then I hereby certify that I have reviewed the enclosed documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report(s) are accurate based on reasonable estimates using data available to the preparers of this report(s).

If the enclosed diskette contains one or more Form A chemicals, then I hereby certify that to the best of my knowledge and belief, for each toxic chemical listed in the Form A statement, the annual reportable amount as defined in 40 CFR 372.27(a) did not exceed 500 pounds for this reporting year and that the chemical was manufactured, processed or otherwise used in an amount not exceeding 1 million pounds during the reporting year.

Sincerely,

J CORY STEEBY
PRESIDENT

7.10.06
revision

Enclosure: Diskette

Click on the TRI Chemical to view the Form R or Form A.

The submission has been PREPARED and is ready to be CERTIFIED and SENT TO EPA.

Status	Date	Time
[X] Prepared	7/10/2006	1:23:55 PM
[ ] Certified		
[ ] Sent to EPA		
[ ] Cancelled		

Reference number:	**TRI00012006071013235 5CORYSTEEBY**
Preparer Email:	csteeby@ebw-electronics.com
Certifying Official:	J CORY STEEBY
Title:	PRESIDENT
E-mail:	tclark@ebw-electronics.com
State Data Exchange State:	**Michigan**
TRI Facility ID:	**New Facility**
Facility:	EBW ELECTRONICS, INC. 13110 RANSOM ST Holland , MI 49424

TRI Chemical or Category	CAS	FORM	RY	Revision
Lead	7439921	R	2005	Yes

(IMPORTANT: Type or print; read instructions before completing form)

File Copy -- Do Not Submit to EPA

EPA United States Environmental Protection Agency

FORM R

Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986, also known as Title III of the Superfund Amendments and Reauthorization Act

TRI Facility ID Number	
New Facility	
Toxic Chemical, Category or Generic Name	Lead

WHERE TO SEND COMPLETED FORMS: 1. TRI Data Processing Center, P.O.Box 1513, Lanham, MD 20703-1513 2. APPROPRIATE STATE OFFICE (See instructions in Appendix F)

Enter "X" here if this is a revision: X

For EPA use only

Important: See instructions to determine when "Not Applicable (NA)" boxes should be checked.

PART I. FACILITY IDENTIFICATION INFORMATION

SECTION 1. REPORTING YEAR 2005

SECTION 2. TRADE SECRET INFORMATION

2.1	Are you claiming the toxic chemical identified on page 2 trade secret? ☐ Yes (Answer question 2.2; Attach substantiation forms) ☒ NO (Do not answer 2.2; Go to Section 3)	2.2	Is this copy ☐ Sanitized ☐ Unsanitized (Answer only if "YES" in 2.1)

SECTION 3. CERTIFICATION (Important: Read and sign after completing all form sections.)

I hereby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data available to the preparers of this report.

Name and official title of owner/operator or senior management official:	Signature	Date Signed:
J Cory Steeby president		07/10/2006

SECTION 4. FACILITY IDENTIFICATION

4.1		TRI Facility ID Number	New Facility
Facility or Establishment Name	EBW Electronics, Inc.	Facility or Establishment Name or Mailing Address (if different from street address)	
Street	13110 Ransom ST	Mailing Address	NA
City/County/State/Zip Code	Holland Ottawa MI 49424	City/State/Zip Code	Country (Non-US)

4.2	This report contains information for: (Important: check a or b; check c or d if applicable)	a. ☒ An entire facility	b. ☐ Part of a facility	c. ☐ A Federal facility	d. ☐ GOCO
4.3	Technical Contact Name	J Cory Steeby	Telephone Number (include area code)	(616) 786-0575	
	Email Address	csteeby@ebw-electronics.com			
4.4	Public Contact Name	J Cory Steeby	Telephone Number (include area code)	(616) 786-0575	

4.5	SIC Code (s) (4 digits)	Primary a. 3679	b.	c.	d.	e.	f.

4.7	Dun & Bradstreet Number(s) (9 digits)	a. 799673603
		b.

SECTION 5. PARENT COMPANY INFORMATION

5.1	Name of Parent Company	NA ☒	
5.2	Parent Company's Dun & Bradstreet Number	NA ☒	

File Copy - Do Not Submit to EPA

EPA FORM R

PART II. CHEMICAL - SPECIFIC INFORMATION

TRI Facility ID Number
[illegible]
Toxic Chemical, Category or Generic Name
Lead

SECTION 1. TOXIC CHEMICAL IDENTITY (Important: DO NOT complete this section if you completed Section 2 below.)

1.1	CAS Number (Important: Enter only one number exactly as it appears on the Section 313 list. Enter category code if reporting a chemical category.) 7439-92-1
1.2	Toxic Chemical or Chemical Category Name (Important: Enter only one name exactly as it appears on the Section 313 list.) Lead
1.3	Generic Chemical Name (Important: Complete only if Part 1, Section 2.1 is checked "Yes". Generic Name must be structurally descriptive.) NA

1.4 Distribution of Each Member of the Dioxin and Dioxin-like Compounds Category.
(If there are any numbers in boxes 1-17, then every field must be filled in with either 0 or some number between 0.01 and 100. Distribution should be reported in percentages and the total should equal 100%. If you do not have speciation data available, indicate NA.)

NA	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
☐																	

SECTION 2. MIXTURE COMPONENT IDENTITY (Important: DO NOT complete this section if you completed Section 1 above.)

2.1	Generic Chemical Name Provided by Supplier (Important: Maximum of 70 characters, including numbers, letters, spaces, and punctuation.) NA

SECTION 3. ACTIVITIES AND USES OF THE TOXIC CHEMICAL AT THE FACILITY
(Important: Check all that apply.)

3.1 Manufacture the toxic chemical:	3.2 Process the toxic chemical:	3.3 Otherwise use the toxic chemical:
a. ☐ Produce b. ☐ Import		
If produce or import:	a. ☐ As a reactant	a. ☐ As a chemical processing aid
c. ☐ For on-site use/processing	b. ☐ As a formulation component	b. ☐ As a manufacturing aid
d. ☐ For sale/distribution	c. ☒ As an article component	c. ☐ Ancillary or other use
e. ☐ As a byproduct	d. ☐ Repackaging	
f. ☐ As an impurity	e. ☐ As an impurity	

SECTION 4. MAXIMUM AMOUNT OF THE TOXIC CHEMICAL ONSITE AT ANY TIME DURING THE CALENDAR YEAR

4.1 02 (Enter two-digit code from instruction package.)

SECTION 5. QUANTITY OF THE TOXIC CHEMICAL ENTERING EACH ENVIRONMENTAL MEDIUM ONSITE

			A. Total Release (pounds/year*) (Enter range code or estimate**)	B. Basis of Estimate (enter code)	C. % From Stormwater
5.1	Fugitive or non-point air emissions	NA ☒			
5.2	Stack or point air emissions	NA ☐	0	O	
5.3	Discharges to receiving streams or water bodies (enter one name per box)				
	Stream or Water Body Name				
5.3.1	NA				
5.3.2					
5.3.3					

If additional pages of Part II, Section 5.3 are attached, indicate the total number of pages in this box ☐ and indicate the Part II, Section 5.3 page number in this box. ☐ (example: 1,2,3, etc.)

* For Dioxin or Dioxin-like compounds, report in grams/year

** Range Codes: A= 1- 10 pounds; B= 11- 499 pounds; C= 500 - 999 pounds.

File Copy - Do Not Submit to EPA

EPA FORM R

PART II. CHEMICAL - SPECIFIC INFORMATION (CONTINUED)

TRI Facility ID Number	
Name of Facility	
Toxic Chemical, Category, or Generic Name	Lead

SECTION 5. QUANTITY OF THE TOXIC CHEMICAL ENTERING EACH ENVIRONMENTAL MEDIUM ONSITE (Continued)

		NA	A. Total Release (pounds/year*) (enter range code** or estimate)	B. Basis of Estimate (enter code)
5.4.1	Underground Injection onsite to Class I Wells	X		
5.4.2	Underground Injection onsite to Class II-V Wells	X		
5.5	Disposal to land onsite			
5.5.1.A	RCRA Subtitle C landfills	X		
5.5.1.B	Other landfills	X		
5.5.2	Land treatment/application farming	X		
5.5.3A	RCRA Subtitle C Surface Impoundments	X		
5.5.3B	Other surface impoundments	X		
5.5.4	Other disposal	X		

SECTION 6. TRANSFERS OF THE TOXIC CHEMICAL IN WASTES TO OFF-SITE LOCATIONS

6.1 DISCHARGES TO PUBLICLY OWNED TREATMENT WORKS (POTWs)

6.1.A Total Quantity Transferred to POTWs and Basis of Estimate

6.1.A.1. Total Transfers (pounds/year*) (enter range code** or estimate)	6.1.A.2 Basis of Estimate (enter code)
NA	

6.1.B. 1	POTW Name	NA					
POTW Address							
City		State		County		Zip	
6.1.B.	POTW Name						
POTW Address							
City		State		County		Zip	

If additional pages of Part II, Section 6.1 are attached, indicate the total number of pages in this box [ ] and indicate the Part II, Section 6.1 page number in this box [ ] (example: 1,2,3, etc.)

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS

6.2. 1 Off-Site EPA Identification Number (RCRA ID No.)	110000318772
Off-Site Location Name	Electrum
Off-site Address	827 Martin

City	Rahway	State	NJ	County	Union	Zip	07065	Country (Non-US)	

Is location under control of reporting facility or parent company? [ ] Yes [X] No

* For Dioxin or Dioxin-like compounds, report in grams/year

** Range Codes: A= 1- 10 pounds; B= 11- 499 pounds; C= 500 - 999 pounds.

File Copy -- Do Not Submit to EPA

EPA FORM R
PART II. CHEMICAL - SPECIFIC INFORMATION (CONTINUED)

TRI Facility ID Number	
Name of Facility	
Toxic Chemical, Category, or Generic Name	
Lead	

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS (Continued)

A. Total Transfers (pounds/year*) (enter range code** or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)
1. 340	1. C	1. M24
2. NA	2.	2.
3.	3.	3.
4.	4.	4.

6.2. 2 Off-Site EPA Identification Number (RCRA ID No.) 110000429313

Off-Site location Name	Kester Solder								
Off-site Address	515 E Touhy								
City	Des Plaines	State	IL	County	Cook	Zip	60018	Country (Non-US)	

Is location under control of reporting facility or parent company? [ ] Yes [X] No

A. Total Transfers (pounds/year*) (enter range code** or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)
1. 230	1. C	1. M24
2. NA	2.	2.
3.	3.	3.
4.	4.	4.

SECTION 7A. ONSITE WASTE TREATMENT METHODS AND EFFICIENCY

[X] Not Applicable (NA) - Check here if no on-site waste treatment is applied to any waste stream containing the toxic chemical or chemical category.

a. General Waste Stream (enter code)	b. Waste Treatment Method(s) Sequence [enter 3-character code(s)]						d. Waste Treatment Efficiency Estimate [enter 2 character code]
7A.1a	7A.1b	1		2			7A.1d
	3		4		5		
	6		7		8		
7A.2a	7A.2b	1		2			7A.2d
	3		4		5		
	6		7		8		
7A.3a	7A.3b	1		2			7A.3d
	3		4		5		
	6		7		8		
7A.4a	7A.4b	1		2			7A.4d
	3		4		5		
	6		7		8		
7A.5a	7A.5b	1		2			7A.5d
	3		4		5		
	6		7		8		

If additional pages of Part II, Section 6.2/7A are attached, indicate the total number of pages in this box [2]
and indicate the Part II, Section 6.2/7A page number in this box: [1] **(example: 1,2,3, etc.)**

* For Dioxin or Dioxin-like compounds, report in grams/year

** Range Codes: A= 1- 10 pounds; B= 11- 499 pounds; C= 500 - 999 pounds.

File Copy - Do Not Submit to EPA

EPA FORM R
PART II. CHEMICAL - SPECIFIC INFORMATION (CONTINUED)

TRI Facility ID Number	
Name of Facility	
Toxic Chemical, Category, or Generic Name	Lead

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS (Continued)

A. Total Transfers (pounds/year*) (enter range code** or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)
1.	1.	1.
2.	2.	2.
3.	3.	3.
4.	4.	4.

6.2. 3 Off-Site EPA Identification Number (RCRA ID No.): 110002025736

Off-Site location Name: Autumn Hills RDF

Off-site Address: 700 56TH AVENUE

City	Zeeland	State	MI	County	Ottawa	Zip	49464	Country (Non-US)	

Is location under control of reporting facility or parent company? [ ] Yes [X] No

A. Total Transfers (pounds/year*) (enter range code** or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)
1. 0	1. O	1. M64
2. NA	2.	2.
3.	3.	3.
4.	4.	4.

SECTION 7A. ONSITE WASTE TREATMENT METHODS AND EFFICIENCY

[ ] Not Applicable (NA) - Check here if no on-site waste treatment is applied to any waste stream containing the toxic chemical or chemical category.

a. General Waste Stream (enter code)	b. Waste Treatment Method(s) Sequence [enter 3-character code(s)]								d. Waste Treatment Efficiency Estimate [enter 2 character code]
7A.6a	7A.6b		1		2				7A.6d
	3		4		5				
	6		7		8				
7A.7a	7A.7b		1		2				7A.7d
	3		4		5				
	6		7		8				
7A.8a	7A.8b		1		2				7A.8d
	3		4		5				
	6		7		8				
7A.9a	7A.9b		1		2				7A.9d
	3		4		5				
	6		7		8				
7A.10a	7A.10b		1		2				7A.10d
	3		4		5				
	6		7		8				

If additional pages of Part II, Section 6.2/7A are attached, indicate the total number of pages in this box [2]
and indicate the Part II, Section 6.2/7A page number in this box: [2] **(example: 1,2,3, etc.)**

* For Dioxin or Dioxin-like compounds, report in grams/year

** Range Codes: A= 1- 10 pounds; B= 11- 499 pounds; C= 500 - 999 pounds.

File Copy - Do Not Submit to EPA

EPA FORM R
PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI Facility ID Number
[illegible]
Toxic Chemical, Category, or Generic Name
Lead

SECTION 7B. ON-SITE ENERGY RECOVERY PROCESSES

[X] Not Applicable (NA) - Check here if no on-site energy recovery is applied to any waste stream containing the toxic chemical or chemical category.

Energy Recovery Methods [enter 3-character code(s)]

1 [ ] 2 [ ] 3 [ ]

SECTION 7C. ON-SITE RECYCLING PROCESSES

[X] Not Applicable (NA) - Check here if no on-site recyling is applied to any waste stream containing the toxic chemical or chemical category.

Recycling Methods [enter 3-character code(s)]

1 [ ] 2 [ ] 3 [ ]

SECTION 8. SOURCE REDUCTION AND RECYCLING ACTIVITIES

		Column A Prior Year (pounds/year*)	Column B Current Reporting Year (pounds/year*)	Column C Following Year (pounds/year*)	Column D Second Following Year (pounds/year*)
8.1					
8.1a	Total on-site disposal to Class I Underground Injection Wells, RCRA Subtitle C landfills, and other landfills	NA	NA	NA	NA
8.1b	Total other on-site disposal or other releases	0	0	0	0
8.1c	Total off-site disposal to Class I Underground Injection Wells, RCRA Subtitle C landfills, and other landfills	0	0	0	0
8.1d	Total other off-site disposal or other releases	NA	NA	NA	NA
8.2	Quantity used for energy recovery onsite	NA	NA	NA	NA
8.3	Quantity used for energy recovery offsite	NA	NA	NA	NA
8.4	Quantity recycled onsite	NA	NA	NA	NA
8.5	Quantity recycled offsite	1062	570	500	500
8.6	Quantity treated onsite	NA	NA	NA	NA
8.7	Quantity treated offsite	NA	NA	NA	NA
8.8	Quantity released to the environment as a result of remedial actions, catastrophic events, or one-time events not associated with production processes (pounds/year)	NA			
8.9	Production ratio or activity index	1.30			

8.10 Did your facility engage in any source reduction activities for this chemical during the reporting year? If not, enter "NA" in Section 8.10.1 and answer Section 8.11.

	Source Reduction Activities [enter code(s)]	Methods to Identify Activity (enter codes)		
8.10.1	NA	a.	b.	c.
8.10.2		a.	b.	c.
8.10.3		a.	b.	c.
8.10.4		a.	b.	c.

8.11	If you wish to submit additional optional information on source reduction, recycling, or pollution control activities with this report, check "Yes."	Yes [X]

*For Dioxin or Dioxin-like compounds, report in grams/year

TRI Facility ID Number
New Facility
Toxic Chemical, Category, or Generic Name
Lead

Copy -- Do Not Submit to E

SECTION 8.11. Submit additional optional information on source reduction, recycling, or pollution control activities.

Scrap assemblies containing lead are recycled.
Waste from soldering operations is recycled.

Signature Certification for U.S. EPA Diskette Submission

EBW ELECTRONICS, INC.
701 COMMERCE CT

HOLLAND, MI 49424
TRI Fac. ID: NEW FACILITY
07/13/2006

EPCRA Reporting Center
P.O. Box 3348
Merrifield, VA 22116-3348
Attn: Toxic Release Inventory
Magnetic Media Submission

To Whom It May Concern:

Enclosed please find one (1) microcomputer diskette containing toxic chemical release reporting information for:

EBW ELECTRONICS, INC.

This information is submitted as required under section 313 of the Emergency Planning and Community Right-to-Know Act of 1986 and the Pollution Prevention Act of 1990.

We are submitting a total of 1 chemical report(s) for our facility.

These 1 chemical report(s) are described below:

Chemical Name	Reporting Year	CAS Number	Report
Lead	2001	7439-92-1	Form R

Our technical point of contact is:

J CORY STEEBY Phone Number: (616) 786-0575

and is available should any questions or problems arise in the processing of this diskette.

I hereby certify that I have reviewed the enclosed documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report(s) are accurate based on reasonable estimates using data available to the preparers of this report(s).

Sincerely,

J CORY STEEBY
PRESIDENT
EBW ELECTRONICS, INC.

Enclosures: Diskette

EPA United States Environmental Protection Agency

FORM R

TOXIC CHEMICAL RELEASE INVENTORY REPORTING FORM

Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986, also known as Title III of the Superfund Amendments and Reauthorization Act

WHERE TO SEND COMPLETED FORMS: 1. EPCRA Reporting Center P.O.Box 3348 Merrifield, VA 22116-3348 ATTN: TOXIC CHEMICAL RELEASE INVENTORY 2. APPROPRIATE STATE OFFICE (See instructions in Appendix F)

Enter "X" here if this is a revision

For EPA use only

Important: See instructions to determine when "Not Applicable (NA)" boxes should be checked.

PART I. FACILITY IDENTIFICATION INFORMATION

SECTION 1. REPORTING YEAR 2001

SECTION 2. TRADE SECRET INFORMATION

2.1	Are you claiming the toxic chemical identified on page 2 trade secret? ☐ Yes (Answer question 2.2; Attach substantiation forms) ☒ NO (Do not answer 2.2; Go to Section 3)	2.2	Is this copy ☐ Sanitized ☐ Unsanitized (Answer only if "YES" in 2.1)

SECTION 3. CERTIFICATION (Important: Read and sign after completing all form sections.)

I hereby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data availble to the preparers of this report.

File Copy - Do Not Submit to EPA

Name and official title of owner/operator or senior management official:	Signature:	Date Signed:
J CORY STEEBY PRESIDENT		07/13/2006

SECTION 4. FACILITY IDENTIFICATION

4.1		TRI Facility ID Number	NEW FACILITY
Facility or Establishment Name	EBW ELECTRONICS, INC.	Facility or Establishment Name or Mailing Address (if different from street address)	
Street	701 COMMERCE CT	Mailing Address	NA
City/County/State/Zip Code	HOLLAND OTTAWA MI 49424	City/State/Zip Code	Country (Non-US)

4.2	This report contains information for: (Important: check a or b; check c or d if applicable)	a. ☒ An entire facility	b. ☐ Part of a facility	c. ☐ A Federal facility	d. ☐ GOCO		
4.3	Technical Contact Name	J CORY STEEBY			Telephone Number (include area code) (616) 786-0575		
4.4	Public Contact Name	J CORY STEEBY			Telephone Number (include area code) (616) 786-0575		
4.5	SIC Code (s) (4 digits)	Primary a. 3679	b.	c.	d.	e.	f.

		Degrees	Minutes	Seconds		Degrees	Minutes	Seconds
4.6	Latitude	42	06	43	Longitude	086	49	11

4.7 Dun & Bradstreet Number(s) (9 digits)	4.8 EPA Identification Number (RCRA I.D. No.) (12 characters)	4.9 Facility NPDES Permit Number(s) (9 characters)	4.10 Underground Injection Well Code (UIC) I.D. Number(s) (12 digits)
a. 799673603	a. NA	a. NA	a. NA
b.	b.	b.	b.

SECTION 5. PARENT COMPANY INFORMATION

5.1	Name of Parent Company	NA ☒	
5.2	Parent Company's Dun & Bradstreet Number	NA ☒	

EPA FORM R
PART II. CHEMICAL - SPECIFIC INFORMATION

TRI Facility ID Number	NEW FACILITY
Toxic Chemical, Category or Generic Name	LEAD

SECTION 1. TOXIC CHEMICAL IDENTITY (Important: DO NOT complete this section if you completed Section 2 below.)

1.1	CAS Number (Important: Enter only one number exactly as it appears on the Section 313 list. Enter category code if reporting a chemical category.) 7439-92-1
1.2	Toxic Chemical or Chemical Category Name (Important: Enter only one name exactly as it appears on the Section 313 list.) LEAD
1.3	Generic Chemical Name (Important: Complete only if Part 1, Section 2.1 is checked "Yes". Generic Name must be structurally descriptive.) NA

1.4 Distribution of Each Member of the Dioxin and Dioxin-like Compounds Category.
(If there are any numbers in boxes 1-17, then every field must be filled in with either 0 or some number between 0.01 and 100. Distribution should be reported in percentages and the total should equal 100%. If you do not have speciation data available, indicate NA.)

NA ☐	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17

SECTION 2. MIXTURE COMPONENT IDENTITY (Important: DO NOT complete this section if you completed Section 1 above.)

2.1	Generic Chemical Name Provided by Supplier (Important: Maximum of 70 characters, including numbers, letters, spaces, and punctuation.) NA

SECTION 3. ACTIVITIES AND USES OF THE TOXIC CHEMICAL AT THE FACILITY
(Important: Check all that apply.)

File Copy Do Not Submit to EPA

3.1 Manufacture the toxic chemical:	3.2 Process the toxic chemical:	3.3 Otherwise use the toxic chemical:
a. ☐ Produce b. ☐ Import		
If produce or import:	a. ☐ As a reactant	a. ☐ As a chemical processing aid
c. ☐ For on-site use/processing	b. ☐ As a formulation component	b. ☐ As a manufacturing aid
d. ☐ For sale/distribution	c. ☒ As an article component	c. ☐ Ancillary or other use
e. ☐ As a byproduct	d. ☐ Repackaging	
f. ☐ As an impurity	e. ☐ As an impurity	

SECTION 4. MAXIMUM AMOUNT OF THE TOXIC CHEMICAL ONSITE AT ANY TIME DURING THE CALENDAR YEAR

4.1	02	(Enter two-digit code from instruction package.)

SECTION 5. QUANTITY OF THE TOXIC CHEMICAL ENTERING EACH ENVIRONMENTAL MEDIUM ONSITE

			A. Total Release (pounds/year*) (Enter range code or estimate**)	B. Basis of Estimate (enter code)	C. % From Stormwater
5.1	Fugitive or non-point air emissions	NA ☒			
5.2	Stack or point air emissions	NA ☐	0	O	
5.3	Discharges to receiving streams or water bodies (enter one name per box)				
	Stream or Water Body Name				
5.3.1	NA				
5.3.2					
5.3.3					

If additional pages of Part II, Section 5.3 are attached, indicate the total number of pages in this box ☐
and indicate the Part II, Section 5.3 page number in this box. ☐ **(example: 1,2,3, etc.)**

* For Dioxin or Dioxin-like compounds, report in grams/year

** Range Codes: A= 1- 10 pounds; B= 11- 499 pounds; C= 500 - 999 pounds.

EPA FORM R

PART II. CHEMICAL - SPECIFIC INFORMATION (CONTINUED)

TRI Facility ID Number
NEW FACILITY
Toxic Chemical, Category, or Generic Name
LEAD

SECTION 5. QUANTITY OF THE TOXIC CHEMICAL ENTERING EACH ENVIRONMENTAL MEDIUM ONSITE (Continued)

		NA	A. Total Release (pounds/year*) (enter range code** or estimate)	B. Basis of Estimate (enter code)
5.4.1	Underground Injection onsite to Class I Wells	X		
5.4.2	Underground Injection onsite to Class II-V Wells	X		
5.5	Disposal to land onsite			
5.5.1.A	RCRA Subtitle C landfills	X		
5.5.1.B	Other landfills	X		
5.5.2	Land treatment/application farming	X		
5.5.3	Surface Impoundment	X		
5.5.4	Other disposal	X		

SECTION 6. TRANSFERS OF THE TOXIC CHEMICAL IN WASTES TO OFF-SITE LOCATIONS

File Copy - Do Not Submit to EPA

6.1 DISCHARGES TO PUBLICLY OWNED TREATMENT WORKS (POTWs)

6.1.A Total Quantity Transferred to POTWs and Basis of Estimate

6.1.A.1. Total Transfers (pounds/year*) (enter range code** or estimate)	6.1.A.2 Basis of Estimate (enter code)
NA	

6.1.B. 1	POTW Name	NA					
POTW Address							
City		State		County		Zip	
6.1.B.	POTW Name						
POTW Address							
City		State		County		Zip	

If additional pages of Part II, Section 6.1 are attached, indicate the total number of pages in this box [ ] and indicate the Part II, Section 6.1 page number in this box [ ] (example: 1,2,3, etc.)

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS

6.2. 1	Off-Site EPA Identification Number (RCRA ID No.)	110000318772							
Off-Site Location Name	ELECTRUM								
Off-site Address	827 MARTIN								
City	RAHWAY	State	NJ	County	UNION	Zip	07065	Country (Non-US)	

Is location under control of reporting facility or parent company? [ ] Yes [X] No

* For Dioxin or Dioxin-like compounds, report in grams/year

** Range Codes: A= 1- 10 pounds; B= 11- 499 pounds; C= 500 - 999 pounds.

EPA FORM R
PART II. CHEMICAL - SPECIFIC INFORMATION (CONTINUED)

TRI Facility ID Number	
NEW FACILITY	
Toxic Chemical, Category, or Generic Name	
LEAD	

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS (Continued)

A. Total Transfers (pounds/year*) (enter range code** or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)
1. 135	1. M	1. M24
2. NA	2.	2.
3.	3.	3.
4.	4.	4.

6.2. 2 Off-Site EPA Identification Number (RCRA ID No.) 110002025736

Off-Site location Name: AUTUMN HILLS RDF

Off-site Address: 700 56TH AVENUE

City	ZEELAND	State	MI	County	OTTAWA	Zip	49464	Country (Non-US)	

Is location under control of reporting facility or parent company? [ ] Yes [X] No

A. Total Transfers (pounds/year*) (enter range code** or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)
1. 0	1. 5	1. M90
2. NA	2.	2.
3.	3.	3.
4.	4.	4.

File Copy -- Do Not Submit to EPA

SECTION 7A. ONSITE WASTE TREATMENT METHODS AND EFFICIENCY

[X] Not Applicable (NA) - Check here if no on-site waste treatment is applied to any waste stream containing the toxic chemical or chemical category.

a. General Waste Stream (enter code)	b. Waste Treatment Method(s) Sequence [enter 3-character code(s)]	c. Range of Influent Concentration	d. Waste Treatment Efficiency Estimate	e. Based on Operating Data ?
7A.1a	7A.1b 1 2 3 4 5 6 7 8	7A.1c	7A.1d %	7A.1e Yes [ ] No [ ]
7A.2a	7A.2b 1 2 3 4 5 6 7 8	7A.2c	7A.2d %	7A.2e Yes [ ] No [ ]
7A.3a	7A.3b 1 2 3 4 5 6 7 8	7A.3c	7A.3d %	7A.3e Yes [ ] No [ ]
7A.4a	7A.4b 1 2 3 4 5 6 7 8	7A.4c	7A.4d %	7A.4e Yes [ ] No [ ]
7A.5a	7A.5b 1 2 3 4 5 6 7 8	7A.5c	7A.5d %	7A.5e Yes [ ] No [ ]

If additional pages of Part II, Section 6.2/7A are attached, indicate the total number of pages in this box [ ]
and indicate the Part II, Section 6.2/7A page number in this box: [ ] **(example: 1,2,3, etc.)**

* For Dioxin or Dioxin-like compounds, report in grams/year

** Range Codes: A= 1- 10 pounds; B= 11- 499 pounds; C= 500 - 999 pounds.

EPA FORM R
PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI Facility ID Number
NEW FACILITY
Toxic Chemical, Category, or Generic Name
LEAD

SECTION 7B. ON-SITE ENERGY RECOVERY PROCESSES

[X] Not Applicable (NA) - Check here if no on-site energy recovery is applied to any waste stream containing the toxic chemical or chemical category.

Energy Recovery Methods [enter 3-character code(s)]

1 [ ] 2 [ ] 3 [ ] 4 [ ]

SECTION 7C. ON-SITE RECYCLING PROCESSES

[X] Not Applicable (NA) - Check here if no on-site recyling is applied to any waste stream containing the toxic chemical or chemical category.

Recycling Methods [enter 3-character code(s)]

1 [ ] 2 [ ] 3 [ ] 4 [ ] 5 [ ]
6 [ ] 7 [ ] 8 [ ] 9 [ ] 10 [ ]

SECTION 8. SOURCE REDUCTION AND RECYCLING ACTIVITIES

File Copy -- Do Not Submit to EPA

		Column A Prior Year (pounds/year*)	Column B Current Reporting Year (pounds/year*)	Column C Following Year (pounds/year*)	Column D Second Following Year (pounds/year*)
8.1	Quantity released ***	0	0	0	0
8.2	Quantity used for energy recovery onsite	NA	NA	NA	NA
8.3	Quantity used for energy recovery offsite	NA	NA	NA	NA
8.4	Quantity recycled onsite	NA	NA	NA	NA
8.5	Quantity recycled offsite	NA	135	1255	1388
8.6	Quantity treated onsite	NA	NA	NA	NA
8.7	Quantity treated offsite	NA	NA	NA	NA
8.8	Quantity released to the environment as a result of remedial actions, catastrophic events, or one-time events not associated with production processes (pounds/year)			0	
8.9	Production ratio or activity index			1.00	

8.10	Did your facility engage in any source reduction activities for this chemical during the reporting year? If not, enter "NA" in Section 8.10.1 and answer Section 8.11.			
	Source Reduction Activities [enter code(s)]	Methods to Identify Activity (enter codes)		
8.10.1	NA	a.	b.	c.
8.10.2		a.	b.	c.
8.10.3		a.	b.	c.
8.10.4		a.	b.	c.
8.11	Is additional information on source reduction, recycling, or pollution control activities included with this report ? (Check one Box)			Yes [ ] No [X]

*For Dioxin or Dioxin-like compounds, report in grams/year

***Report releases pursuant to EPCRA Section 329 (8) including "any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment." Do not include any quantity treated onsite.

Signature Certification for State Diskette Submission

EBW ELECTRONICS, INC.
701 COMMERCE CT

HOLLAND, MI 49424
TRI Fac. ID: NEW FACILITY
07/13/2006

Mr. Robert Jackson
State Emergency Planning and Community Right-to-Know
Michigan Dept. of Environmental Quality
Environmental Assistance Division
P.O. Box 30457
Lansing, MI 48909

To Whom It May Concern:

Enclosed please find one (1) microcomputer diskette containing toxic chemical release reporting information for:

EBW ELECTRONICS, INC.

This information is submitted as required under section 313 of the Emergency Planning and Community Right-to-Know Act of 1986 and the Pollution Prevention Act of 1990.

We are submitting a total of 1 chemical report(s) for our facility.

These 1 chemical report(s) are described below:

Chemical Name	Reporting Year	CAS Number	Report
Lead	2001	7439-92-1	Form R

Our technical point of contact is:

J CORY STEEBY Phone Number: (616) 786-0575

and is available should any questions or problems arise in the processing of this diskette.

I hereby certify that I have reviewed the enclosed documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report(s) are accurate based on reasonable estimates using data available to the preparers of this report(s).

Sincerely,

J CORY STEEBY
PRESIDENT
EBW ELECTRONICS, INC.

Enclosures: Diskette

EPA United States Environmental Protection Agency

FORM R

TOXIC CHEMICAL RELEASE INVENTORY REPORTING FORM

Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986, also known as Title III of the Superfund Amendments and Reauthorization Act

WHERE TO SEND COMPLETED FORMS: 1. EPCRA Reporting Center P.O.Box 3348 Merrifield, VA 22116-3348 ATTN: TOXIC CHEMICAL RELEASE INVENTORY 2. APPROPRIATE STATE OFFICE (See instructions in Appendix F)

Enter "X" here if this is a revision

For EPA use only

Important: See instructions to determine when "Not Applicable (NA)" boxes should be checked.

PART I. FACILITY IDENTIFICATION INFORMATION

SECTION 1. REPORTING YEAR 2001

SECTION 2. TRADE SECRET INFORMATION

2.1	Are you claiming the toxic chemical identified on page 2 trade secret? [ ] Yes (Answer question 2.2; Attach substantiation forms) [X] NO (Do not answer 2.2; Go to Section 3)	2.2	Is this copy [ ] Sanitized [ ] Unsanitized (Answer only if "YES" in 2.1)

SECTION 3. CERTIFICATION (Important: Read and sign after completing all form sections.)

I hereby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data availble to the preparers of this report.

File Copy -- Do Not Submit to EPA

Name and official title of owner/operator or senior management official:	Signature:	Date Signed:
J CORY STEEBY PRESIDENT		07/13/2006

SECTION 4. FACILITY IDENTIFICATION

4.1		TRI Facility ID Number	NEW FACILITY
Facility or Establishment Name	EBW ELECTRONICS, INC.	Facility or Establishment Name or Mailing Address (if different from street address)	
Street	701 COMMERCE CT	Mailing Address	NA
City/County/State/Zip Code	HOLLAND OTTAWA MI 49424	City/State/Zip Code	Country (Non-US)

4.2	This report contains information for: (Important: check a or b; check c or d if applicable)	a. [X] An entire facility	b. [ ] Part of a facility	c. [ ] A Federal facility	d. [ ] GOCO		
4.3	Technical Contact Name	J CORY STEEBY			Telephone Number (include area code)	(616) 786-0575	
4.4	Public Contact Name	J CORY STEEBY			Telephone Number (include area code)	(616) 786-0575	
4.5	SIC Code (s) (4 digits)	Primary a. 3679	b.	c.	d.	e.	f.

4.6	Latitude	Degrees	Minutes	Seconds	Longitude	Degrees	Minutes	Seconds
		42	06	43		086	49	11

4.7 Dun & Bradstreet Number(s) (9 digits)	4.8 EPA Identification Number (RCRA I.D. No.) (12 characters)	4.9 Facility NPDES Permit Number(s) (9 characters)	4.10 Underground Injection Well Code (UIC) I.D. Number(s) (12 digits)
a. 799673603	a. NA	a. NA	a. NA
b.	b.	b.	b.

SECTION 5. PARENT COMPANY INFORMATION

5.1	Name of Parent Company	NA [X]	
5.2	Parent Company's Dun & Bradstreet Number	NA [X]	

EPA FORM R
PART II. CHEMICAL - SPECIFIC INFORMATION

TRI Facility ID Number
NEW FACILITY
Toxic Chemical, Category or Generic Name
LEAD

SECTION 1. TOXIC CHEMICAL IDENTITY (Important: DO NOT complete this section if you completed Section 2 below.)

1.1	CAS Number (Important: Enter only one number exactly as it appears on the Section 313 list. Enter category code if reporting a chemical category.) 7439-92-1
1.2	Toxic Chemical or Chemical Category Name (Important: Enter only one name exactly as it appears on the Section 313 list.) LEAD
1.3	Generic Chemical Name (Important: Complete only if Part 1, Section 2.1 is checked "Yes". Generic Name must be structurally descriptive.) NA

1.4 Distribution of Each Member of the Dioxin and Dioxin-like Compounds Category.
(If there are any numbers in boxes 1-17, then every field must be filled in with either 0 or some number between 0.01 and 100. Distribution should be reported in percentages and the total should equal 100%. If you do not have speciation data available, indicate NA.)

NA ☐	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17

SECTION 2. MIXTURE COMPONENT IDENTITY (Important: DO NOT complete this section if you completed Section 1 above.)

2.1	Generic Chemical Name Provided by Supplier (Important: Maximum of 70 characters, including numbers, letters, spaces, and punctuation.) NA

SECTION 3. ACTIVITIES AND USES OF THE TOXIC CHEMICAL AT THE FACILITY (Important: Check all that apply.)

File Copy Do Not Submit to EPA

3.1 Manufacture the toxic chemical:	3.2 Process the toxic chemical:	3.3 Otherwise use the toxic chemical:
a. ☐ Produce b. ☐ Import		
If produce or import:	a. ☐ As a reactant	a. ☐ As a chemical processing aid
c. ☐ For on-site use/processing	b. ☐ As a formulation component	b. ☐ As a manufacturing aid
d. ☐ For sale/distribution	c. ☒ As an article component	c. ☐ Ancillary or other use
e. ☐ As a byproduct	d. ☐ Repackaging	
f. ☐ As an impurity	e. ☐ As an impurity	

SECTION 4. MAXIMUM AMOUNT OF THE TOXIC CHEMICAL ONSITE AT ANY TIME DURING THE CALENDAR YEAR

4.1	02	(Enter two-digit code from instruction package.)

SECTION 5. QUANTITY OF THE TOXIC CHEMICAL ENTERING EACH ENVIRONMENTAL MEDIUM ONSITE

			A. Total Release (pounds/year*) (Enter range code or estimate**)	B. Basis of Estimate (enter code)	C. % From Stormwater
5.1	Fugitive or non-point air emissions	NA ☒			
5.2	Stack or point air emissions	NA ☐	0	O	
5.3	Discharges to receiving streams or water bodies (enter one name per box)				
	Stream or Water Body Name				
5.3.1	NA				
5.3.2					
5.3.3					

If additional pages of Part II, Section 5.3 are attached, indicate the total number of pages in this box ☐ and indicate the Part II, Section 5.3 page number in this box. ☐ (example: 1,2,3, etc.)

* For Dioxin or Dioxin-like compounds, report in grams/year

** Range Codes: A= 1- 10 pounds; B= 11- 499 pounds; C= 500 - 999 pounds.

EPA FORM R

PART II. CHEMICAL - SPECIFIC INFORMATION (CONTINUED)

TRI Facility ID Number
NEW FACILITY
Toxic Chemical, Category, or Generic Name
LEAD

SECTION 5. QUANTITY OF THE TOXIC CHEMICAL ENTERING EACH ENVIRONMENTAL MEDIUM ONSITE (Continued)

		NA	A. Total Release (pounds/year*) (enter range code** or estimate)	B. Basis of Estimate (enter code)
5.4.1	Underground Injection onsite to Class I Wells	X		
5.4.2	Underground Injection onsite to Class II-V Wells	X		
5.5	Disposal to land onsite			
5.5.1.A	RCRA Subtitle C landfills	X		
5.5.1.B	Other landfills	X		
5.5.2	Land treatment/application farming	X		
5.5.3	Surface Impoundment	X		
5.5.4	Other disposal	X		

SECTION 6. TRANSFERS OF THE TOXIC CHEMICAL IN WASTES TO OFF-SITE LOCATIONS

File Copy - Do Not Submit to EPA

6.1 DISCHARGES TO PUBLICLY OWNED TREATMENT WORKS (POTWs)

6.1.A Total Quantity Transferred to POTWs and Basis of Estimate

6.1.A.1. Total Transfers (pounds/year*) (enter range code** or estimate)	6.1.A.2 Basis of Estimate (enter code)
NA	

6.1.B. 1	POTW Name	NA					
POTW Address							
City		State		County		Zip	
6.1.B.	POTW Name						
POTW Address							
City		State		County		Zip	

If additional pages of Part II, Section 6.1 are attached, indicate the total number of pages in this box [ ] and indicate the Part II, Section 6.1 page number in this box [ ] (example: 1,2,3, etc.)

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS

6.2. 1 Off-Site EPA Identification Number (RCRA ID No.)					110000318772				
Off-Site Location Name	ELECTRUM								
Off-site Address	827 MARTIN								
City	RAHWAY	State	NJ	County	UNION	Zip	07065	Country (Non-US)	

Is location under control of reporting facility or parent company? [ ] Yes [X] No

* For Dioxin or Dioxin-like compounds, report in grams/year

** Range Codes: A= 1- 10 pounds; B= 11- 499 pounds; C= 500 - 999 pounds.

EPA FORM R
PART II. CHEMICAL - SPECIFIC INFORMATION (CONTINUED)

TRI Facility ID Number	
NEW FACILITY	
Toxic Chemical, Category, or Generic Name	
LEAD	

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS (Continued)

A. Total Transfers (pounds/year*) (enter range code** or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)
1. 135	1. M	1. M24
2. NA	2.	2.
3.	3.	3.
4.	4.	4.

6.2. 2 Off-Site EPA Identification Number (RCRA ID No.)	110002025736
Off-Site location Name	AUTUMN HILLS RDF
Off-site Address	700 56TH AVENUE

City	ZEELAND	State	MI	County	OTTAWA	Zip	49464	Country (Non-US)	

Is location under control of reporting facility or parent company? [ ] Yes [X] No

A. Total Transfers (pounds/year*) (enter range code** or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)
1. 0	1. 0	1. M90
2. NA	2.	2.
3.	3.	3.
4.	4.	4.

File Copy - Do Not Submit to EPA

SECTION 7A. ONSITE WASTE TREATMENT METHODS AND EFFICIENCY

[X] Not Applicable (NA) - Check here if no on-site waste treatment is applied to any waste stream containing the toxic chemical or chemical category.

a. General Waste Stream (enter code)	b. Waste Treatment Method(s) Sequence [enter 3-character code(s)]	c. Range of Influent Concentration	d. Waste Treatment Efficiency Estimate	e. Based on Operating Data ?
7A.1a	7A.1b 1 2 3 4 5 6 7 8	7A.1c	7A.1d %	7A.1e Yes [ ] No [ ]
7A.2a	7A.2b 1 2 3 4 5 6 7 8	7A.2c	7A.2d %	7A.2e Yes [ ] No [ ]
7A.3a	7A.3b 1 2 3 4 5 6 7 8	7A.3c	7A.3d %	7A.3e Yes [ ] No [ ]
7A.4a	7A.4b 1 2 3 4 5 6 7 8	7A.4c	7A.4d %	7A.4e Yes [ ] No [ ]
7A.5a	7A.5b 1 2 3 4 5 6 7 8	7A.5c	7A.5d %	7A.5e Yes [ ] No [ ]

If additional pages of Part II, Section 6.2/7A are attached, indicate the total number of pages in this box [ ]
and indicate the Part II, Section 6.2/7A page number in this box: [ ] (example: 1,2,3, etc.)

* For Dioxin or Dioxin-like compounds, report in grams/year

** Range Codes: A= 1- 10 pounds; B= 11- 499 pounds; C= 500 - 999 pounds.

EPA FORM R
PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI Facility ID Number	
NEW FACILITY	
Toxic Chemical, Category, or Generic Name	
LEAD	

SECTION 7B. ON-SITE ENERGY RECOVERY PROCESSES

[X] Not Applicable (NA) - Check here if no on-site energy recovery is applied to any waste stream containing the toxic chemical or chemical category.

Energy Recovery Methods [enter 3-character code(s)]

1 [ ] 2 [ ] 3 [ ] 4 [ ]

SECTION 7C. ON-SITE RECYCLING PROCESSES

[X] Not Applicable (NA) - Check here if no on-site recyling is applied to any waste stream containing the toxic chemical or chemical category.

Recycling Methods [enter 3-character code(s)]

1 [ ] 2 [ ] 3 [ ] 4 [ ] 5 [ ]
6 [ ] 7 [ ] 8 [ ] 9 [ ] 10 [ ]

SECTION 8. SOURCE REDUCTION AND RECYCLING ACTIVITIES

File Copy -- Do Not Submit to EPA

		Column A Prior Year (pounds/year*)	Column B Current Reporting Year (pounds/year*)	Column C Following Year (pounds/year*)	Column D Second Following Year (pounds/year*)
8.1	Quantity released	0	0	0	0
8.2	Quantity used for energy recovery onsite	NA	NA	NA	NA
8.3	Quantity used for energy recovery offsite	NA	NA	NA	NA
8.4	Quantity recycled onsite	NA	NA	NA	NA
8.5	Quantity recycled offsite	NA	135	1255	1388
8.6	Quantity treated onsite	NA	NA	NA	NA
8.7	Quantity treated offsite	NA	NA	NA	NA
8.8	Quantity released to the environment as a result of remedial actions, catastrophic events, or one-time events not associated with production processes (pounds/year)			0	
8.9	Production ratio or activity index			1.00	

8.10	Did your facility engage in any source reduction activities for this chemical during the reporting year? If not, enter "NA" in Section 8.10.1 and answer Section 8.11.			
	Source Reduction Activities [enter code(s)]	Methods to Identify Activity (enter codes)		
8.10.1	NA	a.	b.	c.
8.10.2		a.	b.	c.
8.10.3		a.	b.	c.
8.10.4		a.	b.	c.
8.11	Is additional information on source reduction, recycling, or pollution control activities included with this report ? (Check one Box)			Yes [ ] No [X]

*For Dioxin or Dioxin-like compounds, report in grams/year

***Report releases pursuant to EPCRA Section 329 (8) including "any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment." Do not include any quantity treated onsite.

Called 11 July, 1:30 PM
616-399-0261

Called By Cory Steebe @ 11:55 AM 12 July

Questions

Did you discontinue using the 35 gram syringes? — YES they did out of date copy of remnant

37770 09/27/04 R-276 Sn63Pb37 87% -325+500 35 Gram Syringe

Nothing after this date????

Is this a typical year's consumption? — YES

37543 09/07/04 Sn63Pb37 .015" 245/50 Wire 1lb Spools

" " Sn63Pb37 .031" 245/50 Wire 1lb Spools

37622 09/14/04 Sn63Pb37 .015" 245/50 Wire 1lb Spools

" " Sn63Pb37 .031" 245/50 Wire 1lb Spools

Was this used at Commerce Court? Or, if not, was this about the same amount carried over from 2003 so I can use it as the total?

38644* 12/09/04 256 Sn63Pb37 90% -325+500 600 Gram Cartridge 5

38700* 12/21/04 256 Sn63Pb37 90% -325+500 600 Gram Cartridge 7

* These invoices state "Ship to 13110 Ransom Street". According to a telephone conversation with the facility (Attachment XXXX), XXXX)

"SN63PB37 #50/245 .031"
I need the product information to be able to officially determine the flux percentage in #50 core

will send Email

about the R some carryover from previous year

DRAFT Printed July 11, 2006

EBW ELECTRONICS

Design, engineering, and manufacturing of electronic products

June 26, 2006

RECEIVED
JUN 27 2006
PESTICIDES & TOXICS BRANCH
Waste Pesticides & Toxics Division
U.S. EPA - REGION 5

John D. Myhre (DT-8J)
Multi-Program Inspector
Waste, Pesticides, & Toxics Enforcement Section
USEPA, Region 5
77 West Jackson BLVD
Chicago IL 60604-3590

Dear Mr Myhre:

Enclosed please find invoices for Lead based solders that EBW Electronics, Inc. purchased during 2004. The invoices have been divided into 4 groups to cover 4 different lead based solder products purchased. A single invoice often covered more than 1 item pertinent to this reporting. In these instances the invoice is included in the information multiple times. For example, Invoice # 37622 is included in the *wire spool solder* group and then again in the *stencil solder paste* group.

Also, included are MSDS sheet and copies of product labels for the same lead based solders.

There are four Lead based solders included in this reporting:

Stencil Paste = Kester EP256
Bar = Kester Sn63Pb37 Ultra Low Dross Bar Solder
Wire = Kester Sn63Pb37 245/50 Wire 1lb spools
0.015" & 0.031" diameter wires
Dispense Paste = Kester R-276 Sn63Pb37

Please contact me at 616 786 0575 Ext. 14 if you have any questions or require any additional information.

Kind Regards,

Cory Steeby
President
EBW Electronics, Inc.

13110 Ransom Street • Holland, Michigan 49424 • www.ebw-electronics.com
800 787 0575 toll-free • 616 786 0575 phone • 616 786 0513 fax

RECEIPT FOR SAMPLES AND DOCUMENTS

U.S. ENVIRONMENTAL PROTECTION AGENCY
Emergency Planning and Community Right-to-Know Act of 1986
(SARA Title III)

1. INVESTIGATION IDENTIFICATION			3. FIRM NAME
DATE	INSPECTOR NO.	DAILY SEQ. NO.	EBW Electronics
4 April 2006	FEP57	1	

4. INSPECTOR ADDRESS	5. FIRM ADDRESS
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5, DT-8J 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590	13110 Ransom st. Holland, MI 49424

The documents and samples of chemical substances and/or mixtures described below were collected in connection with the administration and enforcement of the Emergency Planning and Community Right-to-Know Act of 1986.

RECEIPT OF THE DOCUMENT(S) AND/OR SAMPLES DESCRIBED IS HEREBY ACKNOWLEDGED:

NO.	DESCRIPTION
	Documentation for calendar year 2004, listed in items 1, 2, 3, and 4 below, is to be submitted by April 28, 2005
1	Purchase Invoices for lead based solders for listed EPCRA 313 toxic chemicals and/or chemical categories or mixtures containing listed EPCRA 313 toxic chemicals and/or toxic chemical categories used by the facility in calendar year 2004
2	MSDS sheets or copies of product labels for lead-based solders for listed EPCRA Section 313 toxic chemicals and/or toxic chemical categories or mixtures containing listed EPCRA Section 313 toxic chemicals and/or toxic chemical categories used by the facility. If the supplier notification is not dated as applicable to calendar year 2004, a document is needed stating that the documentation submitted is applicable to calendar year 2004
3	Documentation of the facility usage calculations, including methodology, utilized to determine usage of listed EPCRA Section 313 toxic chemicals or toxic chemical categories.
4	~~Documentation of the determination of the Activity (Manufacture Use, Process Use, and/or Otherwise Use) of each listed EPCRA Section 313 toxic chemical or toxic chemical category used during calendar year ___~~

INSPECTOR SIGNATURE	RECIPIENT SIGNATURE
John D. Myhre	[illegible]
NAME: John D. Myhre	NAME: J Cory Steeby
TITLE: EPCRA Compliance Inspector — DATE SIGNED: 4 April 2006	TITLE: President — DATE SIGNED: 4.4.06

Duplicate copies

KEM-TRON INC

7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:

37009

Invoice Date: 07/19/04

Salesman: Larry

Ship Via: UPS - Ground

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: 19893

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
200 lbs	Sn63Pb37 Ultra Low Dross Bar Solder 01369NPI	$3.85	$770.00
4 ea	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe 05398	$12.07	$48.28

KE3800 @ 8/25

RECEIVED JUL 22 2004

Payment Due within 30 days of invoice date

Subtotal:	$818.28
Tax:	$0.00
Shipping:	$0.00

Grand Total: $818.28

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE: 37622

Invoice Date: 09/14/04

Salesman: Larry

Our Delivery

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

ENTERED

Ship To: Ship Via:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: P019326

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
10 lbs	Sn63Pb37 .015" 245/50 Wire 1lb Spools	$11.50	$115.00
10 lbs	Sn63Pb37 .031" 245/50 Wire 1lb Spools	$7.40	$74.00
4 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge	$46.20	$184.80
	05399		
	C 10/10		
	Payment Due within 30 days of invoice date		

RECEIVED SEP 20 2004

Subtotal:	$373.80
Tax:	$0.00
Shipping:	$0.00

Grand Total: $373.80

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

2

KEM-TRON INC

7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:

37073

Invoice Date: 07/26/04

Salesman: Larry

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

ENTERED

Ship To: Ship Via: UPS - Ground
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: **19111**

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
10 ea	**OS-D-10 One-Step No Clean Braid .100** **01420**	$2.65	$26.50
8 ea	**256 Sn63Pb37 90% -325+500 600 Gram Cartridge** **05399**	$46.20	$369.60
4 ea	**R-276 Sn63Pb37 87% -325+500 35 Gram Syringe** **05398**	$12.07	$48.28

KB300
C $25

RECEIVED
JUL 29 2004

Payment Due within 30 days of invoice date

Subtotal:	$444.38
Tax:	$0.00
Shipping:	$6.00

Grand Total: $450.38

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:
36644

Invoice Date: 06/11/04

Salesman: Ed

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship Via: Our Delivery

Customer Order Number: **18902**

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
4 ea	**256 Sn63Pb37 90% -325+500 600 Gram Cartridge** **05399**	$46.20	$184.80
4 ea	**R-276 Sn63Pb37 87% -325+500 35 Gram Syringe** **05398**	$12.07	$48.28
	Payment Due within 30 days of invoice date		
		Subtotal:	$233.08
		Tax:	$0.00
		Shipping:	$0.00
		Grand Total:	**$233.08**

RECEIVED
JUN 14 2004

KE300
C
7/10

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:

36581

Invoice Date: 06/07/04

Salesman: Larry

Ship Via: UPS - Ground

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: 18800

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
4 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$46.20	$184.80
4 ea	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe 05398	$12.07	$48.28
	Payment Due within 30 days of invoice date		
		Subtotal:	$233.08
		Tax:	$0.00
		Shipping:	$4.50
		Grand Total:	$237.58

RECEIVED
JUN 14 2004

C
7/10

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON
7370 Broadmoor Ave SE - Caledonia, MI 49316
Phone: (616) 554 - 8860 Fax: (616) 554 - 8861
www.kem-tron.com

Invoice Number:

36544

Invoice Date: 06/01/04

Salesman: LF

Bill To:

EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To: **Ship Via:** Our Delivery

EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: 18765

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Attention:

Quantity	Description	Price Per Unit	Extended Price
4 ea	**256 Sn63Pb37 90% -325+500 600 Gram Cartridge** **05399**	$46.20	$184.80
4 ea	**R-276 Sn63Pb37 87% -325+500 35 Gram Syringe** **05398**	$12.07	$48.28

RECEIVED
JUN 8 2004

C
6/25

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the goverment specification identified above

Subtotal:	$233.08
Tax:	$0.00
Shipping:	$0.00
Grand Total:	$233.08

2

KEM-TRON INC.

7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE: 36392

Invoice Date: 05/18/04

Salesman: Larry

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship Via: Our Delivery

Customer Order Number: 18636

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
200 lbs	Sn63Pb37 Ultra Low Dross Bar Solder 01369NPI	$3.15	$630.00
10 ea	OS-D-10 One-Step No Clean Braid .100 01420	$2.44	$24.40
10 ea	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe 05398	$13.28	$132.80

C
6/25

RECEIVED
MAY 27 2004

Payment Due within 30 days of invoice date

Subtotal:	$787.20
Tax:	$0.00
Shipping:	$0.00

Grand Total: $787.20

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:
36348

Invoice Date: 05/12/04
Salesman: Ed
Ship Via: UPS - Ground

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: 18627
Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
8 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$46.20	$369.60
7 ea	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe 05398	$12.00	$84.00
	Payment Due within 30 days of invoice date		

RECEIVED
MAY 14 2004

KE300
P
6110

Subtotal:	$453.60
Tax:	$0.00
Shipping:	$4.00
Grand Total:	$457.60

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:

35931

Invoice Date: 04/06/04

Salesman: Larry

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship Via: Our Delivery

Customer Order Number: 18400

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
8 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$45.00	$360.00
4 ea	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe 05398	$12.00	$48.00
	Payment Due within 30 days of invoice date		

KE300
5-10-04 C

RECEIVED
APR 12 2004

Subtotal:	$408.00
Tax:	$0.00
Shipping:	$0.00
Grand Total:	$408.00

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:

35327

Invoice Date: 02/09/04

Salesman: Larry

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship Via: Our Delivery

Customer Order Number: 18125

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
200 lbs	Sn63Pb37 Ultra Low Dross Bar Solder 01369NPI	$2.45	$490.00
4 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$45.00	$180.00
4 ea	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe 05398	$12.00	$48.00

14300
C
3-10

RECEIVED
FEB 16 2004

Payment Due within 30 days of invoice date

Subtotal:	$718.00
Tax:	$0.00
Shipping:	$0.00

Grand Total: $718.00

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

2

KEM-TRON INC

7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:
35240

Invoice Date: 02/02/04

Salesman: Larry

Our Delivery

RECEIVED FEB 6 2004

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship Via:

Customer Order Number: 18087

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
10 ea	OS-D-10 One-Step No Clean Braid .100 01420	$2.44	$24.40
4 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$45.00	$180.00
4 ea	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe 05398	$12.00	$48.00
	Payment Due within 30 days of invoice date		

RECEIVED FEB 11 2004

KE 300
C
$2.25

Subtotal:	$252.40
Tax:	$0.00
Shipping:	$0.00
Grand Total:	$252.40

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:
35640

Invoice Date: 03/09/04

Salesman: Larry

Ship Via: UPS - Ground

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: PO18269-00

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
4 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$45.00	$180.00
16 ea	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe 05398	$12.00	$192.00
	Payment Due within 30 days of invoice date		

KE300
U
4-10

RECEIVED
MAR 15 2004

Subtotal:	$372.00
Tax:	$0.00
Shipping:	$6.00
Grand Total:	$378.00

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:
35617

Invoice Date: 03/08/04

Salesman: Larry

Ship Via: UPS - Ground

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: PO18264

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
4 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$45.00	$180.00
4 ea	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe 05398	$12.00	$48.00
	Payment Due within 30 days of invoice date		

KE300
0
4-10

RECEIVED
MAR 15 2004

Subtotal:	$228.00
Tax:	$0.00
Shipping:	$5.00
Grand Total:	$233.00

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE: 35179

Invoice Date: 01/26/04

Salesman: Ed

Ship Via: UPS - Ground

RECEIVED JAN 30 2004

Bill To:
EBW Electronics, Inc
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: 18067

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
4 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$45.00	$180.00
1 ea	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe 05398	$12.00	$12.00
	Payment Due within 30 days of invoice date		
		Subtotal:	$192.00
		Tax:	$0.00
		Shipping:	$5.00

KE 300
P
2-25-04

RECEIVED JAN 30 2004

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

Grand Total: $197.00

(7) Syringe Solder Paste

KEM-TRON INC.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:

35096

Invoice Date: 01/19/04

Salesman: Larry

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship Via: Our Delivery

Customer Order Number: PO18015-00

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
200 lbs	Sn63Pb37 Ultra Low Dross Bar Solder 01369NPI	$2.25	$450.00
4 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$45.00	$180.00
4 ea	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe 05398	$12.00	$48.00

HE 300 G 2-25-04

RECEIVED JAN 21 2004

Payment Due within 30 days of invoice date

Subtotal:	$678.00
Tax:	$0.00
Shipping:	$0.00

Grand Total: $678.00

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

(4) BAR Solder

KEM-TRON INC
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:

35096

Invoice Date: 01/19/04

Salesman: Larry

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To: Ship Via: Our Delivery
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: PO18015-00

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
200 lbs	Sn63Pb37 Ultra Low Dross Bar Solder 01369NPI	$2.25	$450.00
4 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$45.00	$180.00
4 ea	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe 05398	$12.00	$48.00

KE 300
G
2-25-04

RECEIVED
JAN 21 2004

Payment Due within 30 days of invoice date

Subtotal:	$678.00
Tax:	$0.00
Shipping:	$0.00

Grand Total: $678.00

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:

35327

Invoice Date: 02/09/04

Salesman: Larry

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To: Ship Via: Our Delivery
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: 18125

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
200 lbs	Sn63Pb37 Ultra Low Dross Bar Solder 01369NPI	$2.45	$490.00
4 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$45.00	$180.00
4 ea	R-276 Sn63Pb37 87% -325+500 35 Gram Syringe 05398	$12.00	$48.00

KE300
C
B-10

RECEIVED
FEB 16 2004

Payment Due within 30 days of invoice date

Subtotal:	$718.00
Tax:	$0.00
Shipping:	$0.00

Grand Total: $718.00

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

2

KEM-TRON INC.

7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:
36116

Invoice Date: 04/26/04

Salesman: Larry

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship Via: Our Delivery

Customer Order Number: PO18496-00

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
200 lbs	Sn63Pb37 Ultra Low Dross Bar Solder -01369	$3.15	$630.00
10 ea	OS-D-10 One-Step No Clean Braid .100-01420-01	$2.44	$24.40
4 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$46.20	$184.80
	Payment Due within 30 days of invoice date		
		Subtotal:	$839.20
		Tax:	$0.00
		Shipping:	$0.00
		Grand Total:	$839.20

RECEIVED MAY 3 2004

KE300
C
5/25

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:

36648

Invoice Date: 06/14/04

Salesman: Larry

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship Via: Our Delivery

Customer Order Number: **18914**

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
200 lbs	Sn63Pb37 Ultra Low Dross Bar Solder 01369NPI	$3.85	$770.00
12 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$46.20	$554.40
	KE300 C 9/10		
	Payment Due within 30 days of invoice date		

RECEIVED
JUN 17 2004

Subtotal:	$1,324.40
Tax:	$0.00
Shipping:	$0.00

Grand Total: $1,324.40

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:
36959

Invoice Date: 07/13/04

Salesman: Larry

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship Via: Our Delivery

Customer Order Number: **19043**

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
200 lbs	**Sn63Pb37 Ultra Low Dross Bar Solder 01369NPI**	**$3.85**	**$770.00**
10 ea	**OS-D-10 One-Step No Clean Braid .100 01420**	**$2.65**	**$26.50**
4 ea	**256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399**	**$46.20**	**$184.80**
	Payment Due within 30 days of invoice date		
		Subtotal:	$981.30
		Tax:	$0.00
		Shipping:	$0.00

RECEIVED JUL 19 2004

C 8/10

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

Grand Total: $981.30

KEM-TRON INC.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:

37240

Invoice Date: 08/09/04

Salesman: Larry

Our Delivery

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

ENTERED

Customer Order Number: **19163**

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
200 lbs	**Sn63Pb37 Ultra Low Dross Bar Solder 01369NPI**	$3.85	$770.00
4 ea	**256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399**	$46.20	$184.80
	Payment Due within 30 days of invoice date		
		Subtotal:	$954.80
		Tax:	$0.00
		Shipping:	$0.00

KE300
C
9/10

RECEIVED
AUG 13 2004

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

Grand Total: $954.80

2

KEM-TRON INC.

7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE:

37413

Invoice Date: 08/24/04

Salesman: Larry

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

ENTERED 8/30

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship Via: Our Delivery

Customer Order Number: **19198**

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
200 lbs	**Sn63Pb37 Ultra Low Dross Bar Solder 01369NPI**	$3.85	$770.00
10 ea	**OS-D-10 One-Step No Clean Braid .100 01420**	$2.65	$26.50
8 ea	**256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399**	$46.20	$369.60
	Payment Due within 30 days of invoice date		

RECEIVED AUG 30 2004

C 9/25

Subtotal:	$1,166.10
Tax:	$0.00
Shipping:	$0.00

Grand Total: $1,166.10

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

2

KEM-TRON INC.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE: 37537

Invoice Date: 09/07/04

Salesman: Larry

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship Via: Our Delivery

Customer Order Number: 19288

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
200 lbs	Sn63Pb37 Ultra Low Dross Bar Solder 01369NPI	$3.85	$770.00
10 ea	OS-D-10 One-Step No Clean Braid .100 01420	$2.65	$26.50
4 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$46.20	$184.80

ENTERED

C 10/10

RECEIVED SEP 13 2004

Payment Due within 30 days of invoice date

Subtotal:	$981.30
Tax:	$0.00
Shipping:	$0.00

Grand Total: $981.30

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC.
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE: 37950

Invoice Date: 10/11/04

Salesman: Larry

Ship Via: Our Delivery

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: 19424

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
200 lbs	Sn63Pb37 Ultra Low Dross Bar Solder 01369NPI	$3.85	$770.00
4 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$46.20	$184.80

ENTERED

RECEIVED OCT 18 2004

C 11/10

Payment Due within 30 days of invoice date

Subtotal:	$954.80
Tax:	$0.00
Shipping:	$0.00

Grand Total: $954.80

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick

KEM-TRON INC
7370 Broadmoor Ave SE • Caledonia, MI 49316
Phone: (616) 554-8860 Fax: (616) 554-8861
http://www.kem-tron.com/

INVOICE: 38141

Invoice Date: 10/26/04

Salesman: Larry

Ship Via: Our Delivery

Bill To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Ship To:
EBW Electronics, Inc.
701 Commerce Court
Holland, MI 49424-

Customer Order Number: 19500-00

Attention:

MSDS and Tech Sheets available at: http://www.kem-tron.com/

Quantity	Description	Price Per Unit	Extended Price
200 lbs	Sn63Pb37 Ultra Low Dross Bar Solder 01369NPI	$3.85	$770.00
6 ea	256 Sn63Pb37 90% -325+500 600 Gram Cartridge 05399	$46.20	$277.20

RECEIVED
NOV 01 2004
PAGE..... OF.....

C
11/25

ENTERED

Payment Due within 30 days of invoice date

Subtotal:	$1,047.20
Tax:	$0.00
Shipping:	$0.00

Grand Total: $1,047.20

Certificate of Compliance

We hereby certify the material supplied conforms with the physical and chemical demands indicated in the purchase order and the government specification identified above.

Edward W Frederick