U. S. Environmental Protection Agency
Region 5, Land and Chemicals Division
RCRA Branch, LR-8J
77 West Jackson Blvd
Chicago, IL 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT
as Part of a
MULTIMEDIA INSPECTION

SITE NAME:	**Canton Drop Forge Inc**
EPA ID NUMBER:	**OHD004465142**
ADDRESS:	**4575 Southway Street SW Canton, Ohio 44706**
DATE OF INSPECTION:	**August 6-8, 2012**
EPA INSPECTOR:	**Michael Beedle**

PREPARED BY: _____ 9-11-12
Michael Beedle **Date**

ACCEPTED BY: for _____ 9-11-12
Paul Little, Chief, CS2 **Date**

Purpose of Inspection

This inspection was an evaluation of the Canton Drop Forge Inc's compliance with hazardous waste, used oil and universal waste regulations found at Ohio Administrative Code and the Code of Federal Regulations. I performed the inspection with Cher Salley (MMI Team Leader), Michele Jencius (Air), and Mark Moloney (Water) as part of a Multimedia Inspection. My portion of the inspection was an RCRA Compliance Evaluation Inspection (CEI).

Participants

EPA Inspectors:
Michael Beedle, RCRA
Cher Salley, MMI Lead
Michele Jencius, Air
Mark Moloney, Water

Representatives of Canton Drop Forge Inc (CDF):
Brad Ahbe, President, CDF
Sean Denman, Safety Director, CDF
Keith Houseknecht (retired) Plant Engineer, CDF
Michael Blanestyn, Project Manager, TRC (consultant)

Introduction

The inspectors arrived at the site at approximately 1:30 PM. We introduced ourselves; presented our inspector credentials and business cards; and described the purpose and the process of the inspection. Messrs. Ahbe, Denman, and Houseknecht provided us with a description of the site operations. Messrs. Ahbe, Denman, and Houseknecht led various portions of the tour. Mr. Denman and Houseknecht provided us with the records we requested for review. Canton Drop Forge has approximately 400 employees. The site operates three shifts 24 hours a day and 7 days per week. Not all operations are on that schedule. We provided a small business and compliance assistance information to Mr. Denman.

Site Description

There was general description of the facility on the first day and a more detailed description given on the second day of the inspection. The third day of the inspection included clarification of operations. Canton Drop is a forging plant. The site purchases steel bars of various grades including stainless steel and chrome alloys. The bars are cut, heated in a furnace and placed into a die. The die is two large steel blocks with a cutout of the part dimensions. The forging hammer strikes the top die onto the bottom die on an anvil. The part is cooled and finished. The finishing includes trimming of the flash, blasting, heat treating, grinding, scarfing and welding.

Parts are made for power generation turbines, industrial gears, aerospace landing gear, oil field valves, locomotive engines and cars, and various other applications. The parts are relatively large

and compete with casted parts. The parts are typically machined offsite by the customer into the finished part.

The plant has three steam boilers. Two boilers are natural gas fired and one boiler is coal fired. The natural gas boilers can also be fed No.6 fuel oil to produce steam. The steam drives the forging hammers. The site has 13 forging hammers. The site operates approximately 10 furnaces for heating steel.

The site has water wells that supply the water for facility operations. The well water is treated using lime and soda ash (hot process softener). This system softens water used in the plant. There is a lime cake waste generated through a filter press by the hot process softener. The wastewater from the filter press is discharged to the sewer that leads to the city of Massillon public owned treatment works.

The forging hammers steam is returned to the hot process softener. Cylinder oil lubricates the hammer. A small amount of the cylinder oil is carried back with the steam to the hot process softener. Prior the softener the oil is captured on a plate system. The captured oil is drained to an above ground storage tank that acts as an oil water separator. Water from this tank is fed by gravity into the sewer to the POTW.

The site operates three ponds (surface impoundments). Pond 1 is on the west-side, pond 2 is near the middle, and pond 3 is on the east-side of the property. CDF representatives said the site is designed for surface runoff to drain into pond 1 or pond 2. The majority of site wastewater is conveyed by sewer to pond 2. Pond 2 is pumped from the bottom into pond 3. CDF personnel said that pond 3 does not discharge to a water body or sewer. They said that pond 3 only evaporates or percolates into groundwater. Pond 1 was described to capture storm water run-off and have a couple sewers that drain to it. Pond 1 is pumped into to pond 2 as needed as determined by CDF personnel by visual inspection. Pond 2 water is pumped into pond 3 as determined by level floats on pond 2.

Oil lubricant is splashed onto the die to facilitate the forming of the part. The lubricant is conveyed to the sewer. There is a rope oil water separator on the south side of the forging building. The separator was reportedly installed approximately 12 years ago. From the oil/water separator the sewered material is primarily conveyed to pond 2. However overflows from the separator can go to pond 1. Pond 2 also receives water from boiler blow-downs. There is a rope oil skimmer at pond 2. The oil skimmed is removed into an above ground storage tank. The oil from the tank is pumped into totes and barrels. The material is sent offsite for recycling as used oil.

The site generates used oil, universal waste lamps, swarf, floor sweepings, lime cake, spent blast media, boiler fly ash and bottom ash, scale and furnace bricks. The swarf, spent blast media, bricks, and scale are combined into the floor sweepings waste pile on site. The wastes are managed as one non-hazardous waste stream described as floor sweepings.

The site occasionally generates hazardous waste. The site will perform an acid cleaning of the furnace water seal scale. The waste generation from this process is greater than 1,000 kilograms for the month of cleaning. The cleaning was reported as occurring every three or more years which last occurred in 2007. The site has generated paint hazardous waste and batteries in 2011. Fly ash is captured by a wet scrubber. The ash is first discharged to a sump. The ash is removed from the sump and then placed into a pit on the site property to dry. The ash has been used as a product in various applications but is currently landfilled.

The site cleans dies with kerosene to remove oil, graphite and dirt. The die is then blown off with steam. The liquids are conveyed to the sewer below the Forge Shop building into the oil water rope skimmer at the south end of the building.

The site has a Die Shop where forging dies are maintained and repaired. The building stores used oil in 55-gallon drums. Safety Kleen services the parts washers throughout the plant. The solvent used in the washers was reported to have a flash point above 140°F.

Site Tour

There was a general facility tour on the first day and a more focused tour on the second day. We toured the site observing operations, the three ponds, above ground used oil tanks, 55-gallon drums of used oil, used oil totes at pond 2, the floor sweepings waste pile, the lime waste pile, lime roll-off box, fly ash pit, and universal waste lamps. I took photographs of the various waste management areas during the second day of the inspection. See the photographs in Attachment A.

August 6, 2012, Tour

On the first day of the inspection we started the tour going through die and raw bar product outdoor storage. We went to pond 3. The pond 3 did not have oil on it and ducks were observed on it. Pond 3 was reported to have no discharge. CDF personnel said that the water added to pond 3 is evaporated or percolates to groundwater.

We continued to pond 2. The pond had oil on it and a rope skimmer. Pond 2 has flags and netting above it. Some of the netting was in contact with surface oil on pond 2. There was a rope and above ground storage tank at pond 2.

There appeared to be recent activity at pond 2 including the placement of gravel on areas near the used oil tank and skimmer. These areas were observed to be oil stained during the site screening inspection in July 2011. There were only three totes located near the pond. There were many more totes and barrels during the screening inspection. The totes were labeled "Used Oil". The tank was not labeled or marked "Used Oil". I asked about if there was recent work done at pond 2. Mr. Ahbe reported there was. He said the work was related to investor interest in the company. The netting and flags over the pond were reported by CDF personnel to keep geese out of the pond.

We went through the Saw Department and the Forging Shop. We observed bar being cut and parts being forged. We observed the oil lubricant being splashed onto a die during forging. We observed an area where dies are cleaned with kerosene and steam. The kerosene and water goes into a floor drain that goes to the oil/water separator.

We went through Upsetter Department building and observed heating and shot blasting operations. We went to pond 1. There was oil on the banks and surface of pond 1. There were flags and netting on pond 1 to keep geese off it. We observed the oil/water separator near pond 1 at the south side of the forging building. The separator was an in-ground sump with an above ground rope skimmer where oil is removed into a tote or drum. It was reported that the majority of the water from the separator would go to pond 2. However overflows from it could go to pond 1. It was reported that pond 1 was remediated in the mid-1990's.

There was a large waste pile outside between the Upsetter Department and Forging Shop buildings. It was the floor sweepings. The waste was not homogenous with the appearance of various wastes in it. It was reported that J&J Refuse waste services hauls the waste stream for disposal offsite.

We went to the lab. The lab does a test on forged parts that uses nitric acid and methanol. The nitric acid and methanol wastes are poured down a sink that drains to the POTW. We went to Die Shop where die tooling, repair and maintenance are done. There were two used oil 55-gallon containers that were marked "Used Oil" in the shop.

The first day of the inspection ended at approximately 4:30 PM.

August 7, 2012, Tour

The second day tour started at the area where lime from the filter press is placed on the ground. There is a lined roll-off box where the lime waste is placed prior to shipment offsite. See photos 1-2. We next observed the pit where fly ash is dried and pile of fly ash. See photos 3-5.

There was a lone drum near pond 3. The drum contained "Hilti" spent cartages. The Hilti gun is used imprint CDF information on forged parts. The cartages were similar to 22 caliber brass cartages in a plastic strap. See photos 6-7.

We walked around pond 3. We did not observe any conveyance system offsite of pond 3 water. I observed bottom ash near pond 3. See photos 8-9. Photo 10 is of pond 3 including the piping discharging water from pond 2.

We continued to the area where steam is returned to the hot water softener. There was an approximately 2,000 gallon above ground storage tank where oil/water is conveyed. The tank is used to separate oil from the water. The oil is removed and managed as "used oil" on a quarterly basis. The oil is removed into an approximate 300 gallon tote. Water from the tank is discharge through gravity into the sewer to the POTW. The gravity discharge is at the bottom of the tank. The level is done through hydraulic pressure. The level in the tank must exceed the level of a t-valve located outside of the tank. Photos 11, 12, 15 and 16 are of the tank. Photos 13 and 14 are

of flexible hose from the tank into the sewer. Photo 14 includes the flexible hose from the lime filter press into the sewer. Photos 15 and 16 include the t-valve. I estimated the level of the t-valve to be at the 60% full mark of the tank. Photo 17 is of the lime filter press inside of the Saw Department building.

We went to Pond 1. The area smelled like oil. There was oil, nets, and flags on the pond. The pond banks were covered with oil. The nets in various areas were in contact with oil on the pond. Photos 18-29, 31, 32 and 37 are of the ponds and immediate area. The pond photos start at the northwest corner facing south east and circum the pond to the northeast side of the pond. Photos 23 and 24 are of oil on the ground high on the bank of pond 1. It was reported that when pond 1 was attempted to be remediated that the material from the bottom was removed and attempted to be bio-remediated. The bio-remediation did not work. The pond was lined with clay. The bottom material was returned and another clay liner was placed on top of the material. Photo 31 is of the pump that pumps water from pond 1 to pond 2. Photos 30 (close to the pond), and 38-40 (outside the Forge Shop) are of storm drains that leads to pond 1.

We went to the oil water separator. See photos 33 and 34. The floor sweepings waste pile is near pond 1 and the separator. See photos 35 and 36 of the pile. Photo 41 is of water pooling near die storage near the waste pile. Photo 42 is of used oil drums at the Die Shop.

We ended the tour at pond 2. Photos 43-55 are of pond 2 and the storage units near it. There was oil on the pond and banks. The oil completely covered the surface of the pond. The pond smelled like oil. There was netting and flags above the pond. Some of the netting was in contact with the oil on the pond (see photos 43-45, 47, 48, 54 and 55). Photo 46 was of a surface drainage trench into pond 2. I observed a dragonfly flying near the pond and landing on a net (photo 47).

The area near the rope skimmer was not covered by a net (photo 48). There were three totes marked "used oil" at the pond (photo 49). There was an above ground storage tank at the pond (photos 50, 52, and 53). The tank was not labeled or marked used oil. Near the pond were puddles of oil/water (photo 51). Mr. Maloney tossed a rock into the pond. It appeared to be at least ½ inch of oil covering the whole surface of the pond.

It appeared like there was recent work done by the pond. I observed recent tire tracks in the area. Mr. Denman stated that totes and drums were removed on the Friday prior to the inspection. I mentioned to Mr. Denman that the tank at pond 2 was not labeled or marked "used oil". He looked and did not see any markings or labeling either.

The second day of the inspection ended shortly after the tour ended at about 4:15 PM. I summarized the labeling/marking requirement for used oil tanks.

On August 8, 2012, I went and observed universal waste lamps in a box. The box was closed and dated 6/14/2012.

Record Review

The review of records predominately occurred on the second and third day of the inspection. A general site diagram was provided on the first day of the inspection. Additional diagrams were provided thereafter. See Attachment B for the site diagrams. The site also provided an informational brochure during the site description and record review. See the brochure in Attachment C.

Mr. Denman provided the majority of the records including files for the Air, EPCRA, Waste and Water portions of the multi-media inspection. I reviewed waste profiles/characterizations, waste analysis records, manifests, land disposal restriction notifications (LDR). I completed small quantity generator, small quantity universal waste handler and used oil checklists during the record review. See the checklists in Attachment D.

Mr. Denman made scan copies of the following records that were reviewed for the RCRA portion of the inspection: 2007 manifest shipment of waste acid and 2011 manifests of batteries and paint waste (Attachment E); 2009 Ohio EPA NOV and hazardous waste report (Attachment F); 2007 notification (Attachment F); MSDS for steel shot and aluminum oxide blast media (Attachment G); oil analysis for three types oil used onsite (Attachment H); used oil shipments bill of ladings and other related information (Attachment I); preventative maintenance procedures for the oil water separator and the cylinder oil collection tank (Attachment J); (Attachment K); and TCLP analysis records for refractory, fly ash, floor scrapings (sweepings), and lime cake done in 2011 (Attachment L). Diagrams for the oil/water separator and sewers were also scanned and provided for review (Attachment M).

A used oil shipment to Everclear located in Austin, Ohio, occurred on August 3, 2012. The shipment was 5,800 gallons of used oil shipped in a tanker truck. On the same day, 132 55-gallon drums and two poly totes were shipped off. The totes and drums contained used oil and were pumped out into the tanker truck. The empty drums and totes were sent offsite for recycling. Copies of the manifest for shipment of oil, waste profile and bill of lading of empty containers shipped just prior to the inspection are in Attachment N.

Mr. Houseknecht stated the site was designed so that no run-off leaves the site. All site storm water run-off was reported to be captured by pond 1 or pond 2. He stated that pond 1 was attempted to be remediated in the 1990's. He said all the oil, water, heavy stuff were hauled by trucks to the area between pond 2 and pond 3. He said the material was attempted to be remediated with bugs (bacteria). He said they were sold a bill of goods. The bio-remediation did not work. The material remaining after partial treatment was put back into to pond 1. Pond 1 was first lined with clay. Then the tar like material was put back in place. Then a second liner was placed on top of the material. The clay liners were reported to be approximately six inches thick. I asked about the purpose of the remediation, he said it was driven by change of ownership and financing.

The facility uses a variety of oil lubricants including: die, way, hydraulic, coolant, cylinder, bearing and quench oils. The TCLP analysis records for refractory, fly ash, floor scrapings (sweepings), and lime cake were all below regulatory levels for metals. I mentioned that waste

determinations for the blast media and swarf are required at the point of generation and not once the wastes are mixed with the floor sweepings.

We asked to speak with the person who oversees the pond 1 pumping. Mr. Mike Slates, Maintenance Supervisor, stated that the pond 1 is inspected for: level, pump status and pond height. He said pond1 is pumped when it is about ¾ full. The level depends on recent rains and it occurs every couple weeks. He stated pond 1 was pumped over the past weekend. A couple guys do the pumping and he said Bill Meyers was the person who recently worked on it.

I asked Mr. Slates about the netting and birds. He said not for a long time has there been birds at the ponds. Approximately two years ago, a goose was stuck in the net. He said the nets have been on at least 4-5 years. He said birds used to get caught in the nets and then the site went to streamers. He said the site has used streamers with flags for two years.

Mr. Slates said pond 2 is skimmed by feel approximately every 3 weeks to a month. It skimmed out into the tank. He said the site runs the pond 2 skimmer a week or two at a time. He said the tank is filled visually to approximately a foot or two from the top. The tank is then pumped off into totes. He said the oil is sent out for recycling. He believed Dubro was the one who recycles it. (Dubro supplies the die lube.) He said a float is used to determine when to pump from pond 2 to pond 3. He said the float on pond 2 is set at approximately ¾ full for the pumping to start.

Mr. Slates oversees maintenance at the oil/water separator. He said during heavy rain that the material from the oil/water separator flows to pond 1. He said that personnel look at the oil in the tank in the sump. He said there is oil there all the time. They look for a level to run skimmer. They run the rope skimmer on it every day or two. He said that the oil from cylinder oil tank is removed every three months or so and that approximately 300 gallons is removed at that time.

I provided a copy of a blank used oil checklist. During the completion of the used oil checklist I pointed out the question of related to used oil management in surface impoundments. I mentioned that EPA considers ponds to be surface impoundments. Mr. Houseknecht asked about small amounts of oil getting into the ponds. I mentioned that it appeared to be more than small amounts of oil on pond 1 and pond 2. Mr. Ahbe asked what did it matter if there was no oil in the groundwater. I asked if he knew if there was oil in the groundwater; he said no. We discussed some of the past EPA site visits and regulatory history of used oil.

Mr. Denman provided photographs of the two tanks, cylinder oil and pond 2, which were marked used oil. See the photographs in Attachment O.

Closing Conference

I summarized the used oil labeling and surface impoundment management, waste determination of the swarf and shot media issues identified during the inspection. The inspection concluded at approximately 3 PM.

Inspection Follow-up

On September 7, 2012, Mr. Denman sent me diagrams and reports for the pond 1 (Lagoon1) remediation. See the information in Attachment P. The first diagram from 1998, *Lagoon 1, General Layout – As Built*, shows six pipes go into pond 1. The Parson's 1997 report indicates that the material removed from pond 1 prior to placement back into pond 1 had concentrations of total petroleum hydrocarbons (TPH) of 36,000 to 135,000 ppm.

Attachments

A. Photographs
B. Site Diagrams
C. Site Brochure
D. Checklists
E. Manifests
F. OEPA NOV
G. 2007 notification
H. Blast MSDS
I. Oil Analysis
J. Used Oil Shipments
K. Preventative Maintenance Procedures
L. TCLP Analysis
M. Diagrams for Oil Water Separator and Sewers
N. August 3, 2012, Shipment Information
O. Marked Tanks Photographs
P. Pond 1 Documents

ATTACHMENT A

Photographs

Canton Drop Forge 01 by Mike Beedle,2012/08/07 11:22:10

Canton Drop Forge 02 by Mike Beedle,2012/08/07 11:22:24

Canton Drop Forge 03 by Mike Beedle,2012/08/07 11:26:06

Canton Drop Forge 04 by Mike Beedle,2012/08/07 11:26:21

Canton Drop Forge 05 by Mike Beedle,2012/08/07 11:26:27

Canton Drop Forge 06 by Mike Beedle,2012/08/07 11:34:00

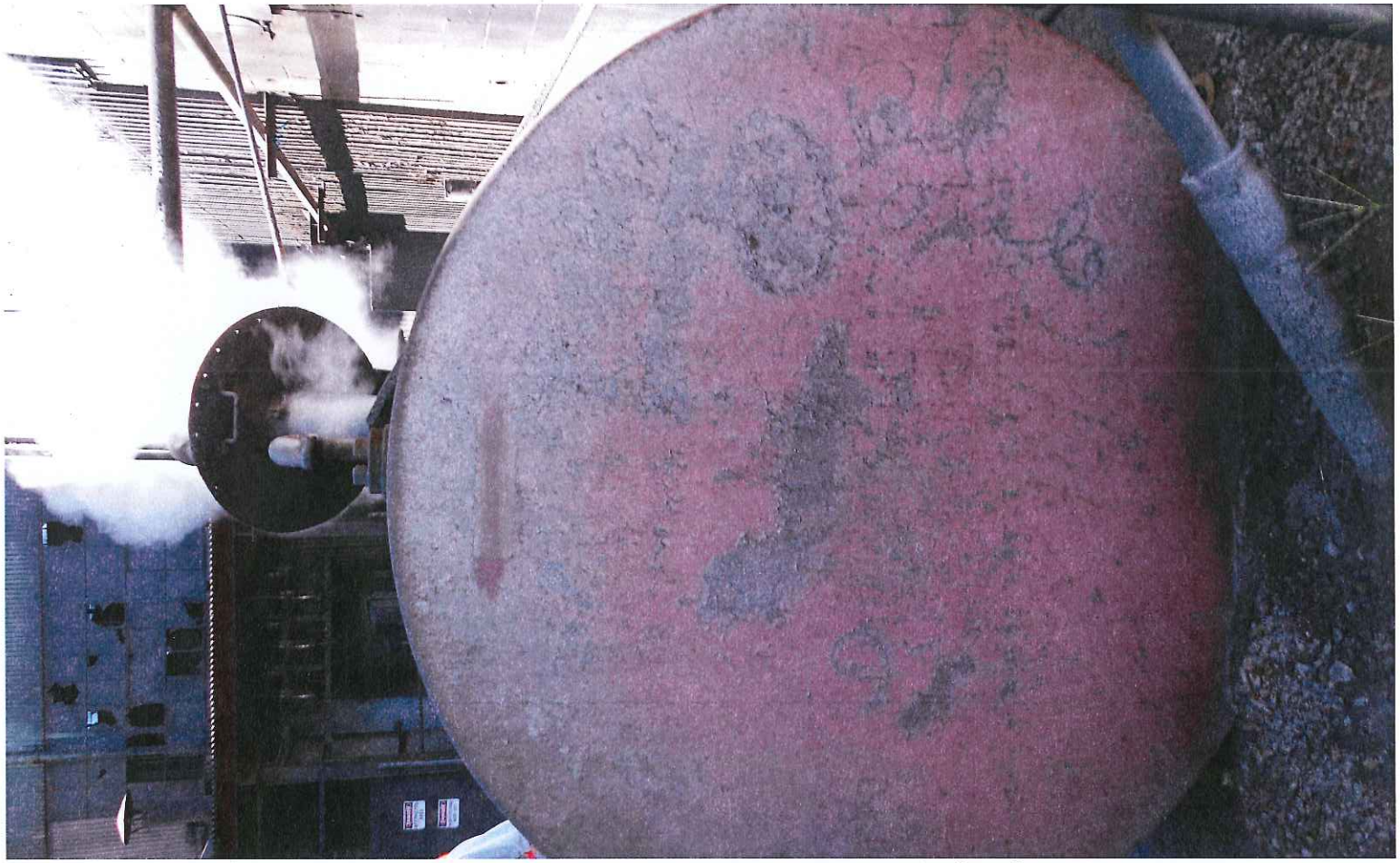
Canton Drop Forge 07 by Mike Beedle,2012/08/07 11:34:54

Canton Drop Forge 08 by Mike Beedle,2012/08/07 11:51:05

Canton Drop Forge 09 by Mike Beedle,2012/08/07 11:51:18

Canton Drop Forge 10 by Mike Beedle,2012/08/07 11:52:06

Canton Drop Forge 11 by Mike Beedle,2012/08/07 12:08:49

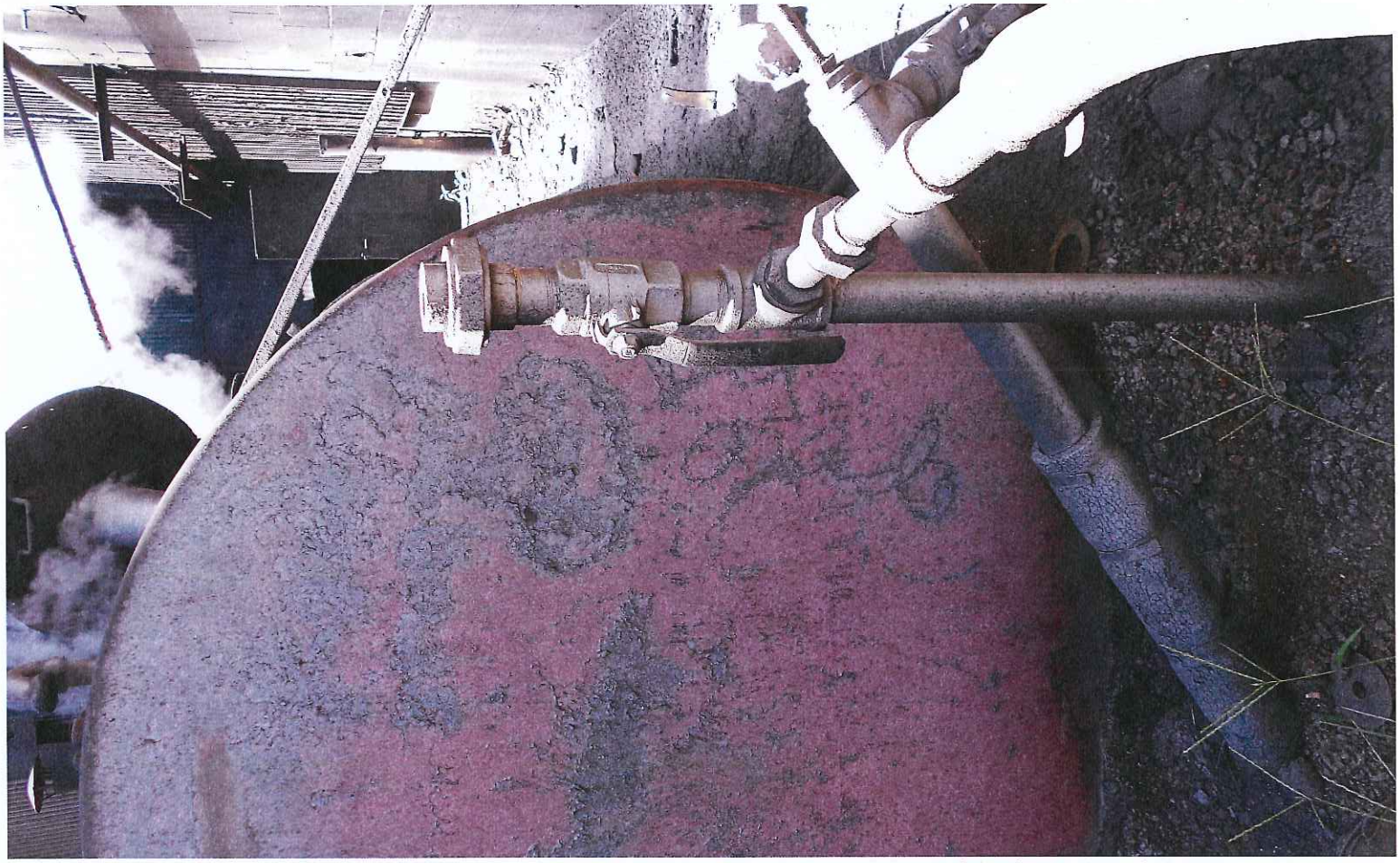


Canton Drop Forge 12 by Mike Beedle,2012/08/07 12:09:32

Canton Drop Forge 13 by Mike Beedle,2012/08/07 12:09:39

Canton Drop Forge 14 by Mike Beedle,2012/08/07 12:09:44

Canton Drop Forge 15 by Mike Beedle,2012/08/07 12:10:50



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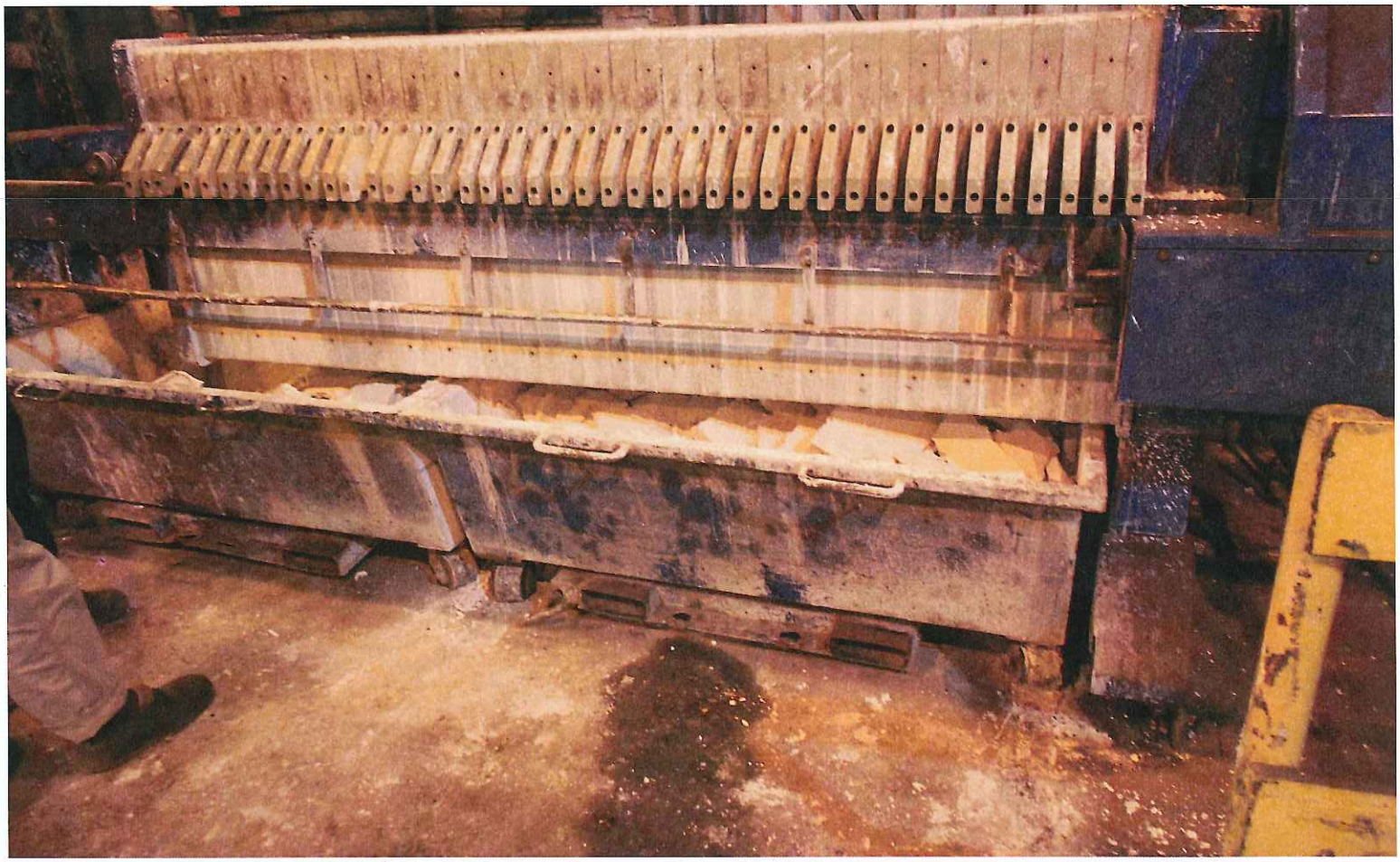
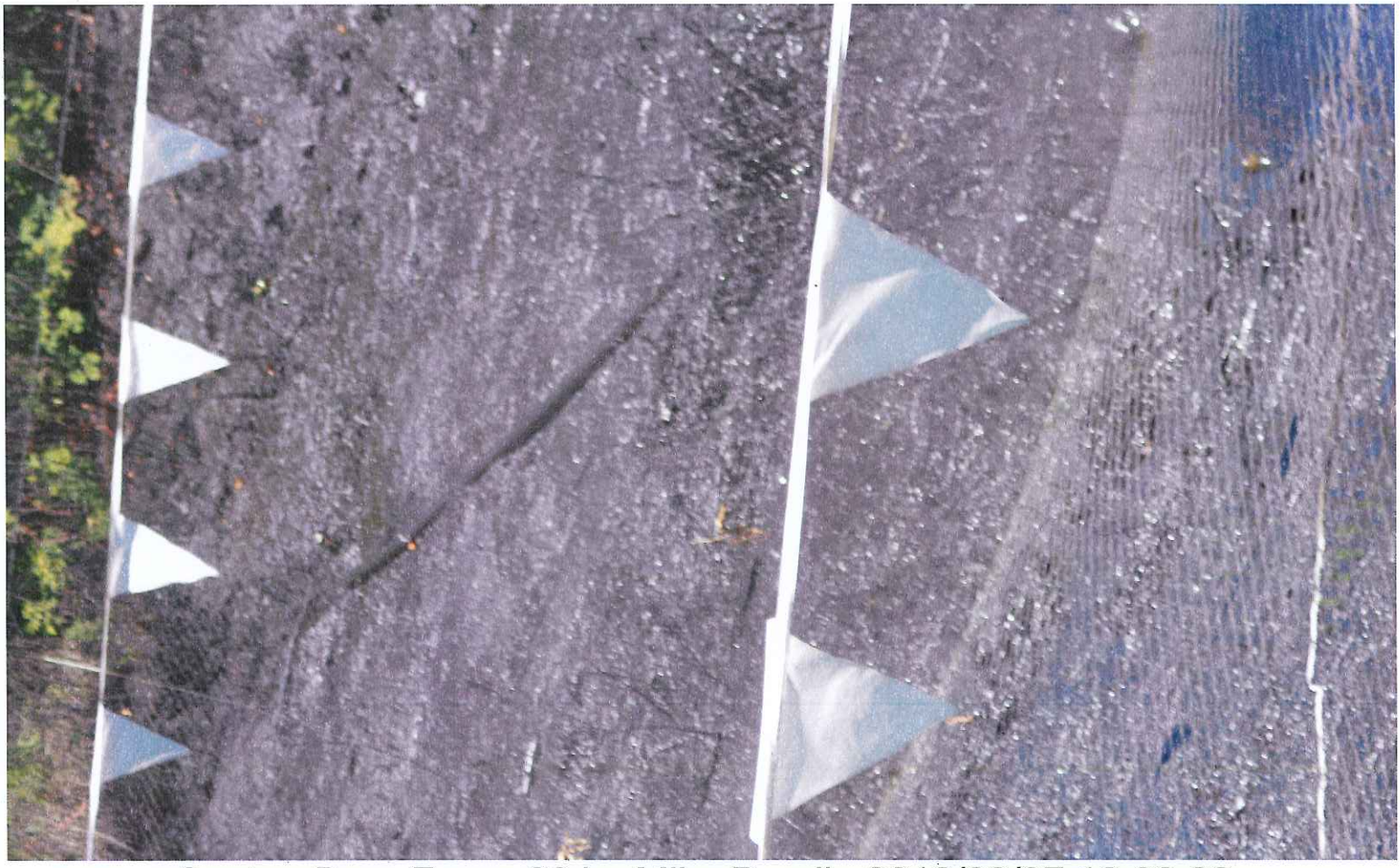


Canton Drop Forge 17 by Mike Beedle,2012/08/07 12:17:12

Canton Drop Forge 18 by Mike Beedle,2012/08/07 12:30:43

Canton Drop Forge 19 by Mike Beedle,2012/08/07 12:32:09



Canton Drop Forge 20 by Mike Beedle,2012/08/07 12:32:22

Canton Drop Forge 21 by Mike Beedle,2012/08/07 12:33:41

Canton Drop Forge 22 by Mike Beedle,2012/08/07 12:34:41

Canton Drop Forge 23 by Mike Beedle,2012/08/07 12:35:20

Canton Drop Forge 24 by Mike Beedle,2012/08/07 12:35:38

Canton Drop Forge 25 by Mike Beedle,2012/08/07 12:36:54

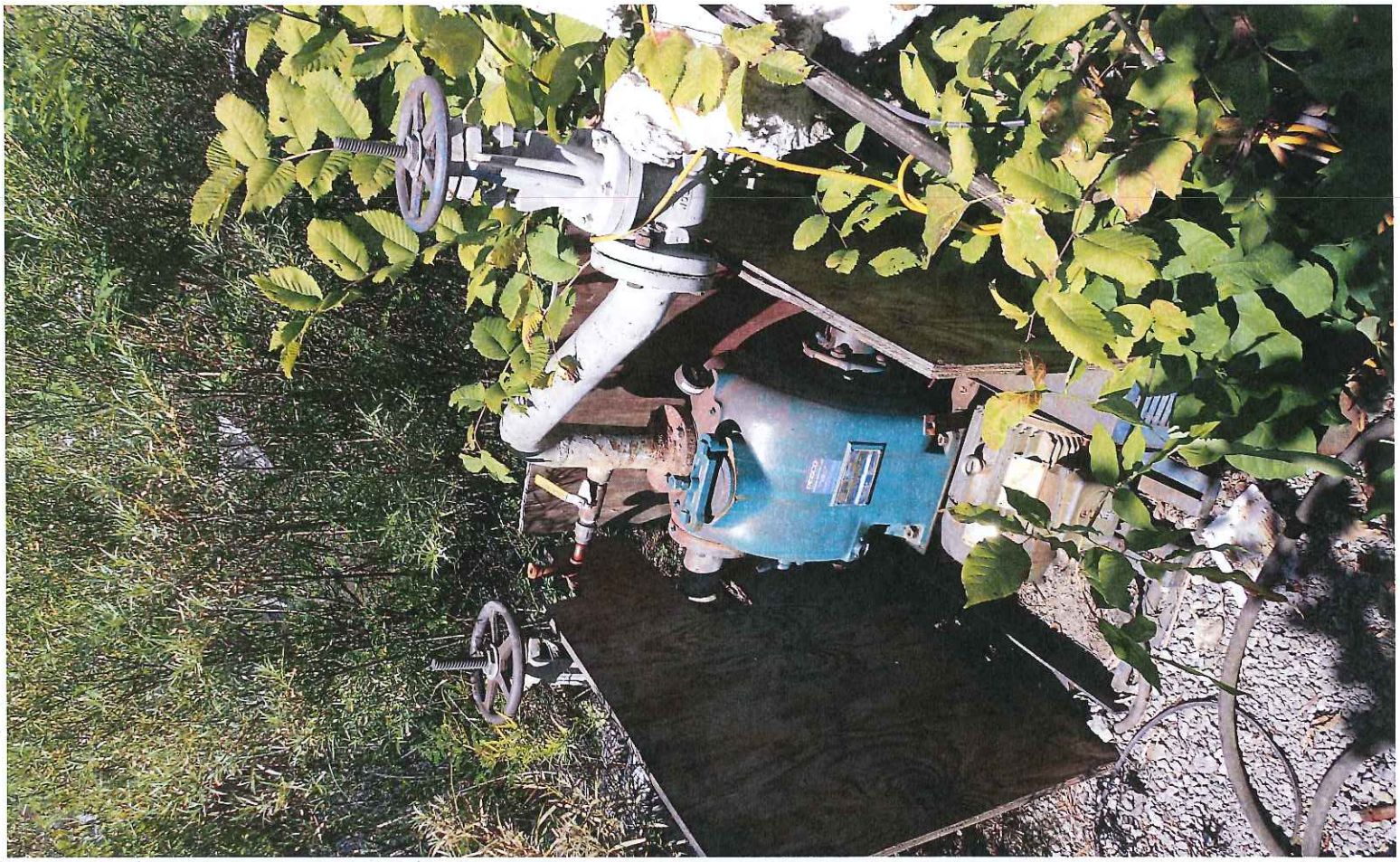
Canton Drop Forge 26 by Mike Beedle,2012/08/07 12:39:56

Canton Drop Forge 27 by Mike Beedle,2012/08/07 12:40:10

Canton Drop Forge 28 by Mike Beedle,2012/08/07 12:40:18

Canton Drop Forge 29 by Mike Beedle,2012/08/07 12:43:48

Canton Drop Forge 30 by Mike Beedle,2012/08/07 12:50:44



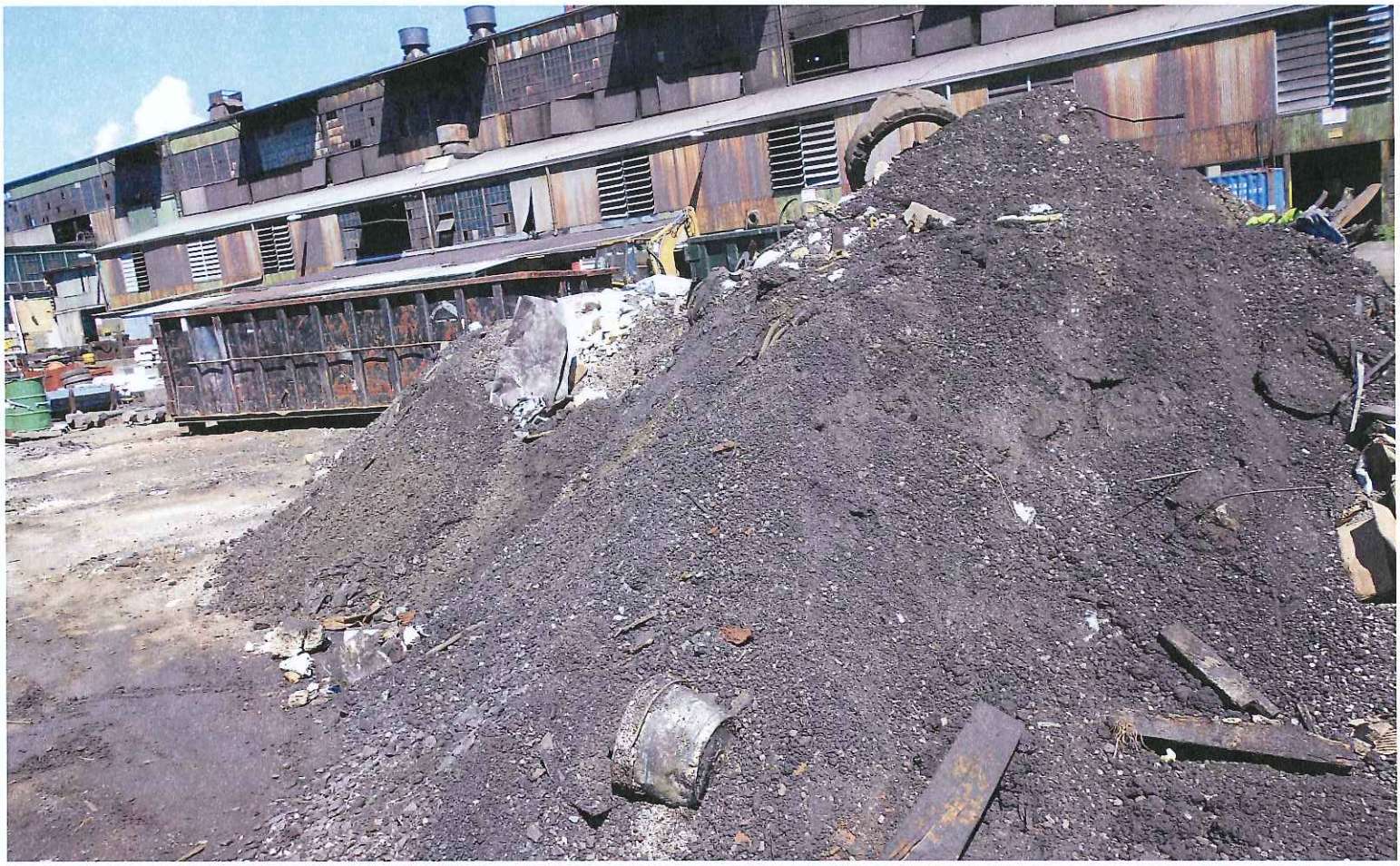
Canton Drop Forge 31 by Mike Beedle,2012/08/07 12:51:15

Canton Drop Forge 32 by Mike Beedle,2012/08/07 12:51:59

Canton Drop Forge 33 by Mike Beedle,2012/08/07 12:53:10

Canton Drop Forge 34 by Mike Beedle,2012/08/07 12:53:38

Canton Drop Forge 35 by Mike Beedle,2012/08/07 12:56:59



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Canton Drop Forge 38 by Mike Beedle,2012/08/07 13:11:44

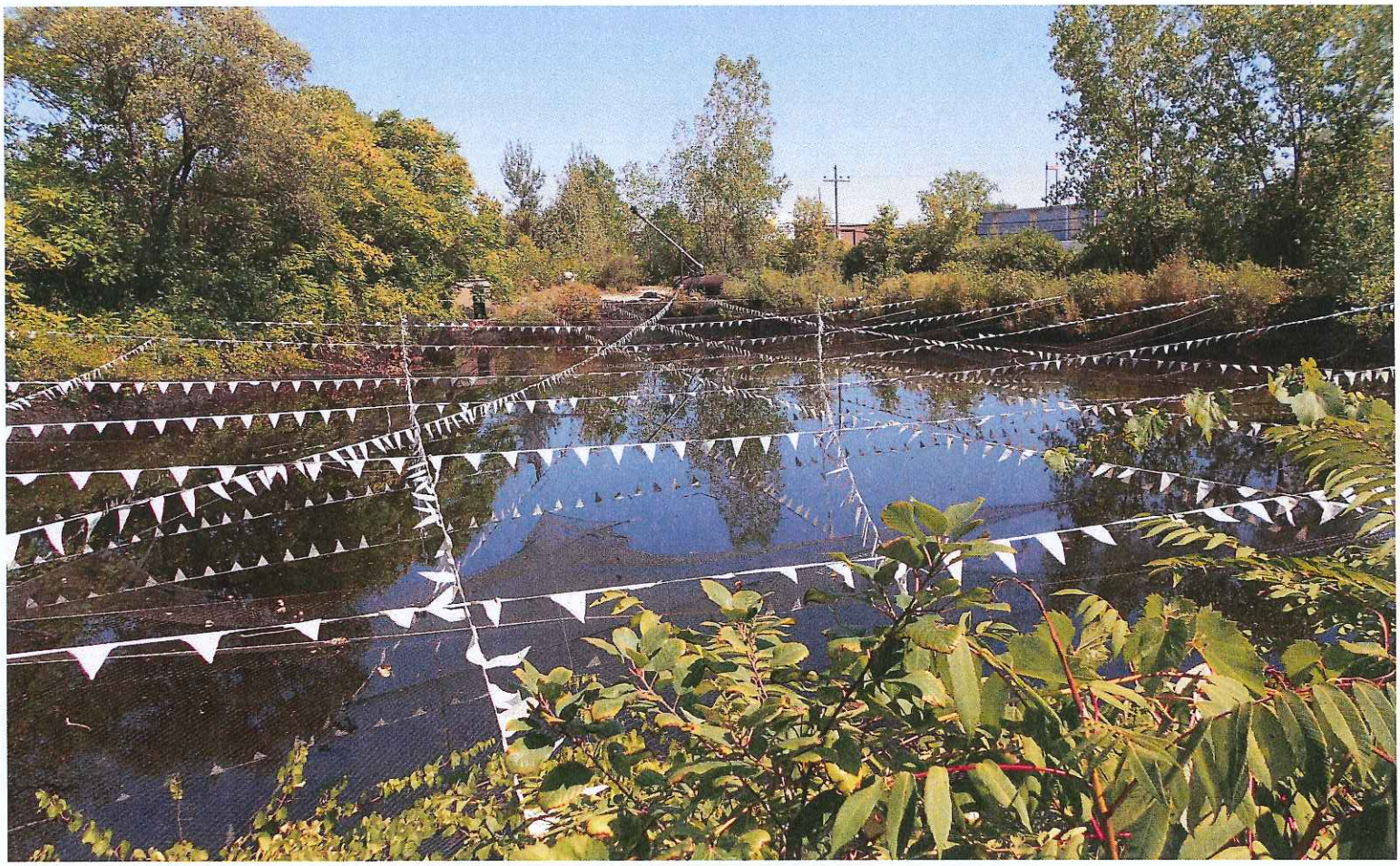
Canton Drop Forge 39 by Mike Beedle,2012/08/07 13:11:53

Canton Drop Forge 40 by Mike Beedle,2012/08/07 13:12:19

Canton Drop Forge 41 by Mike Beedle,2012/08/07 13:13:12

Canton Drop Forge 42 by Mike Beedle,2012/08/07 13:36:11

Canton Drop Forge 43 by Mike Beedle,2012/08/07 13:41:08



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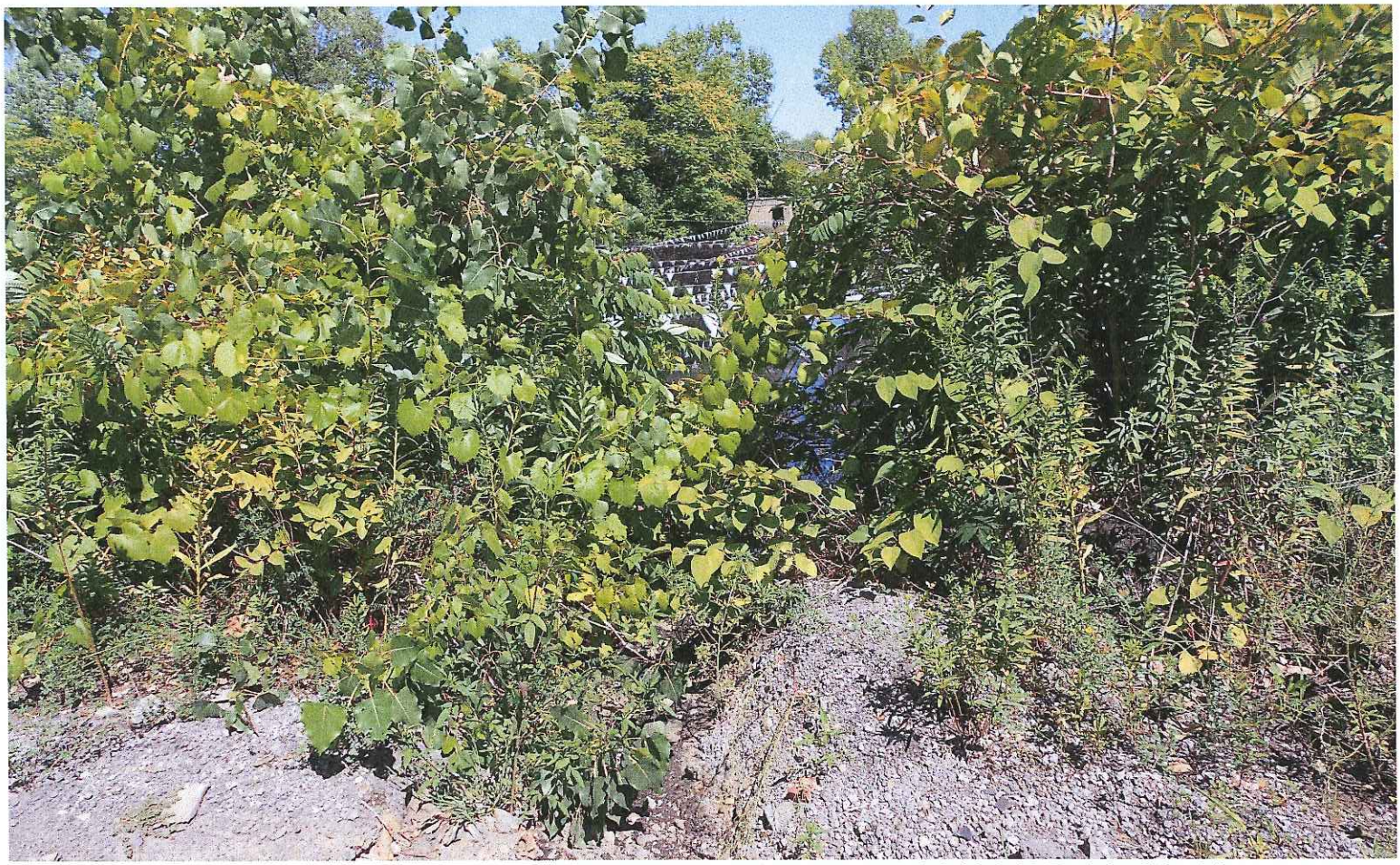
Canton Drop Forge 45 by Mike Beedle,2012/08/07 13:41:19



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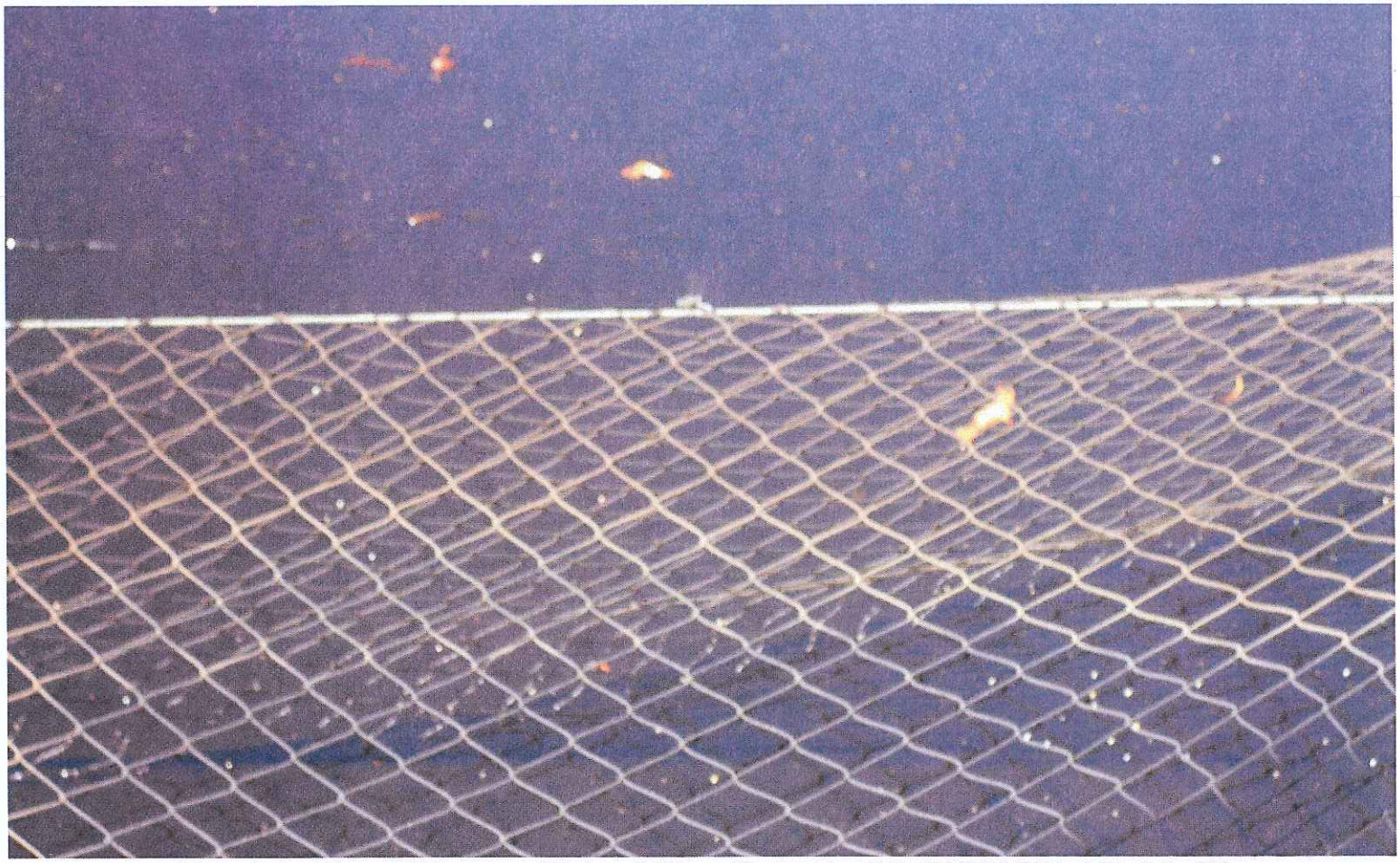


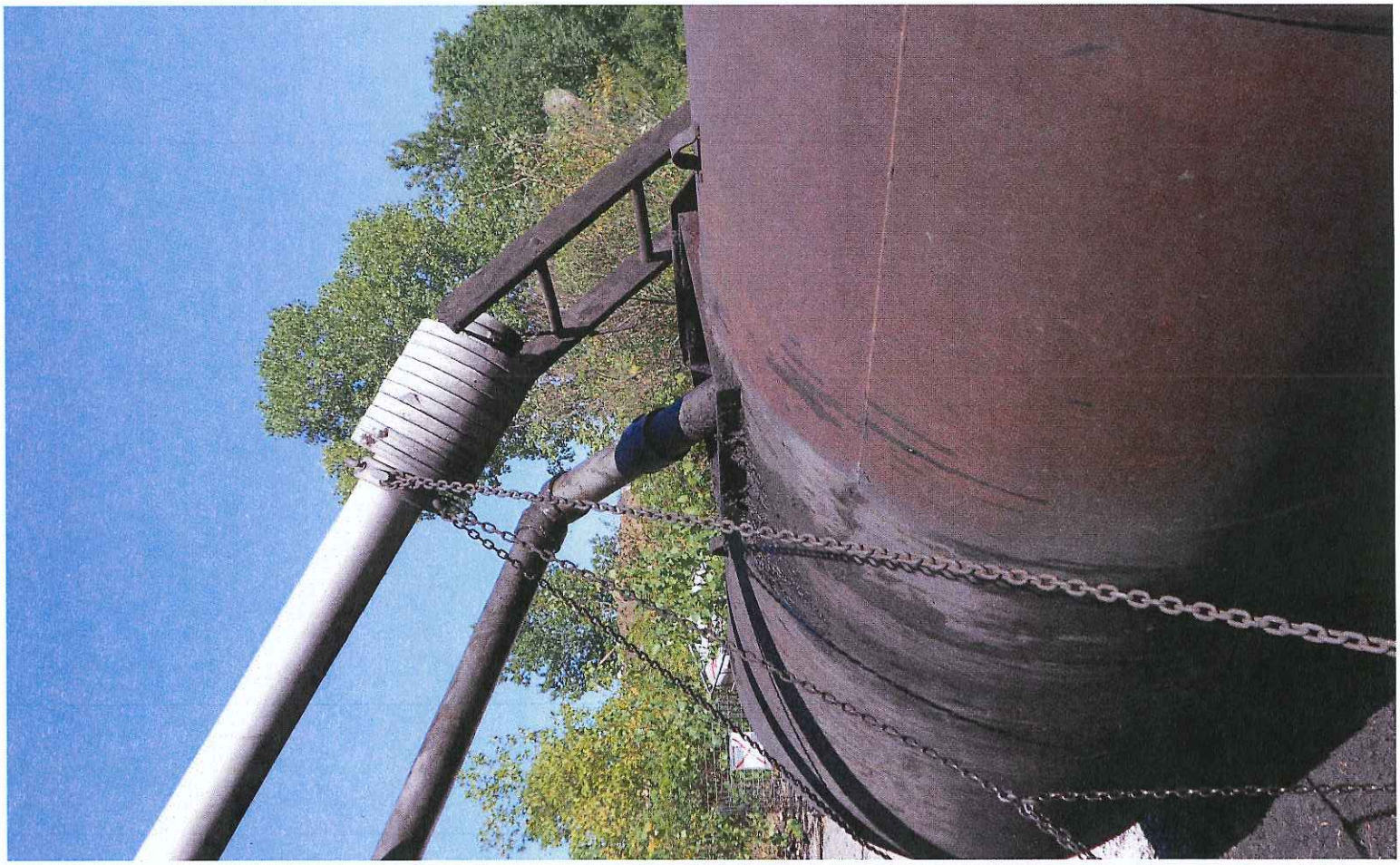
Canton Drop Forge 47 by Mike Beedle,2012/08/07 13:44:48

Canton Drop Forge 48 by Mike Beedle,2012/08/07 13:51:14

Canton Drop Forge 49 by Mike Beedle,2012/08/07 13:52:01

Canton Drop Forge 50 by Mike Beedle,2012/08/07 13:53:59

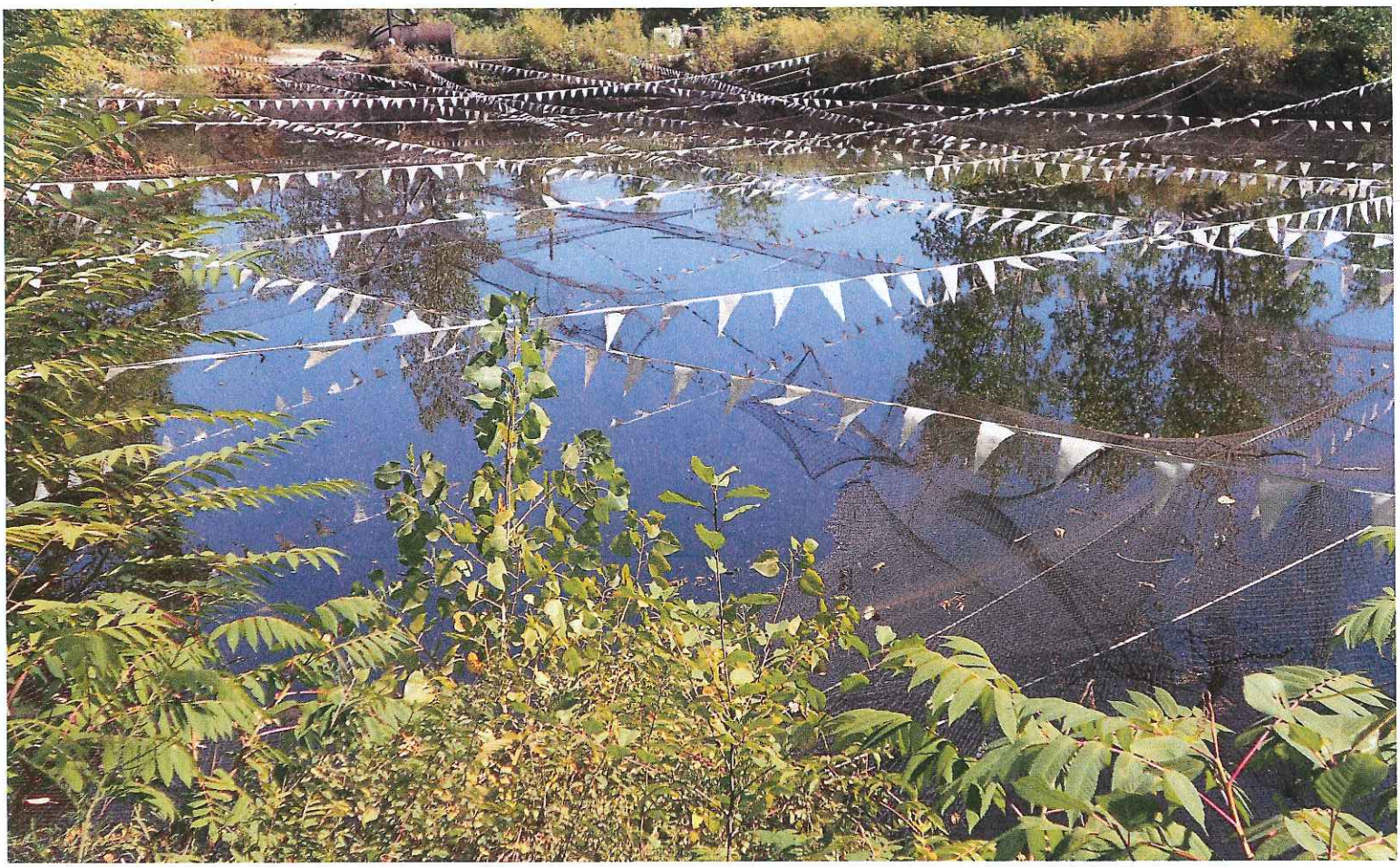
Canton Drop Forge 51 by Mike Beedle,2012/08/07 13:54:16



Canton Drop Forge 52 by Mike Beedle,2012/08/07 13:54:21

Canton Drop Forge 53 by Mike Beedle,2012/08/07 13:55:23

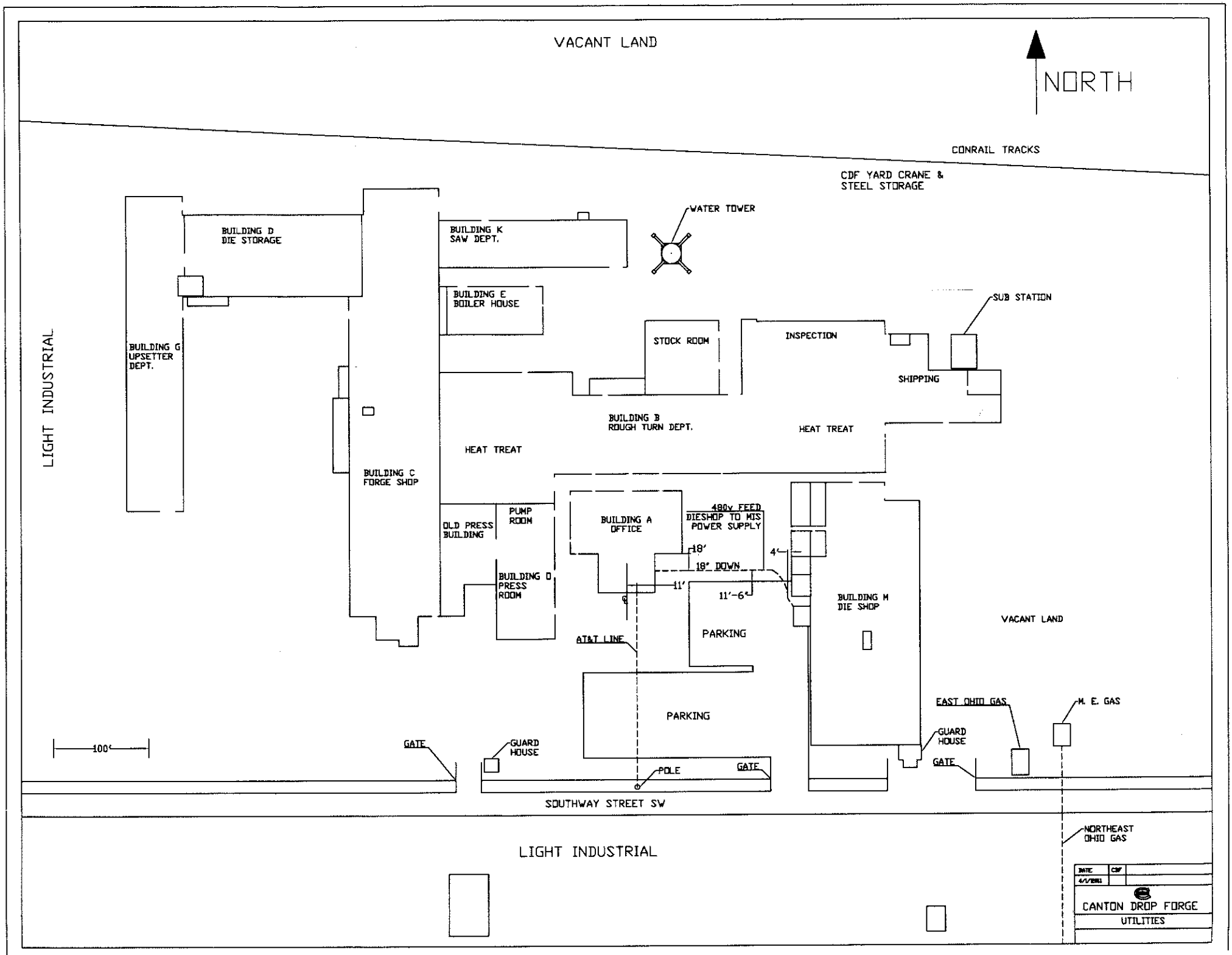
Canton Drop Forge 54 by Mike Beedle,2012/08/07 14:00:32

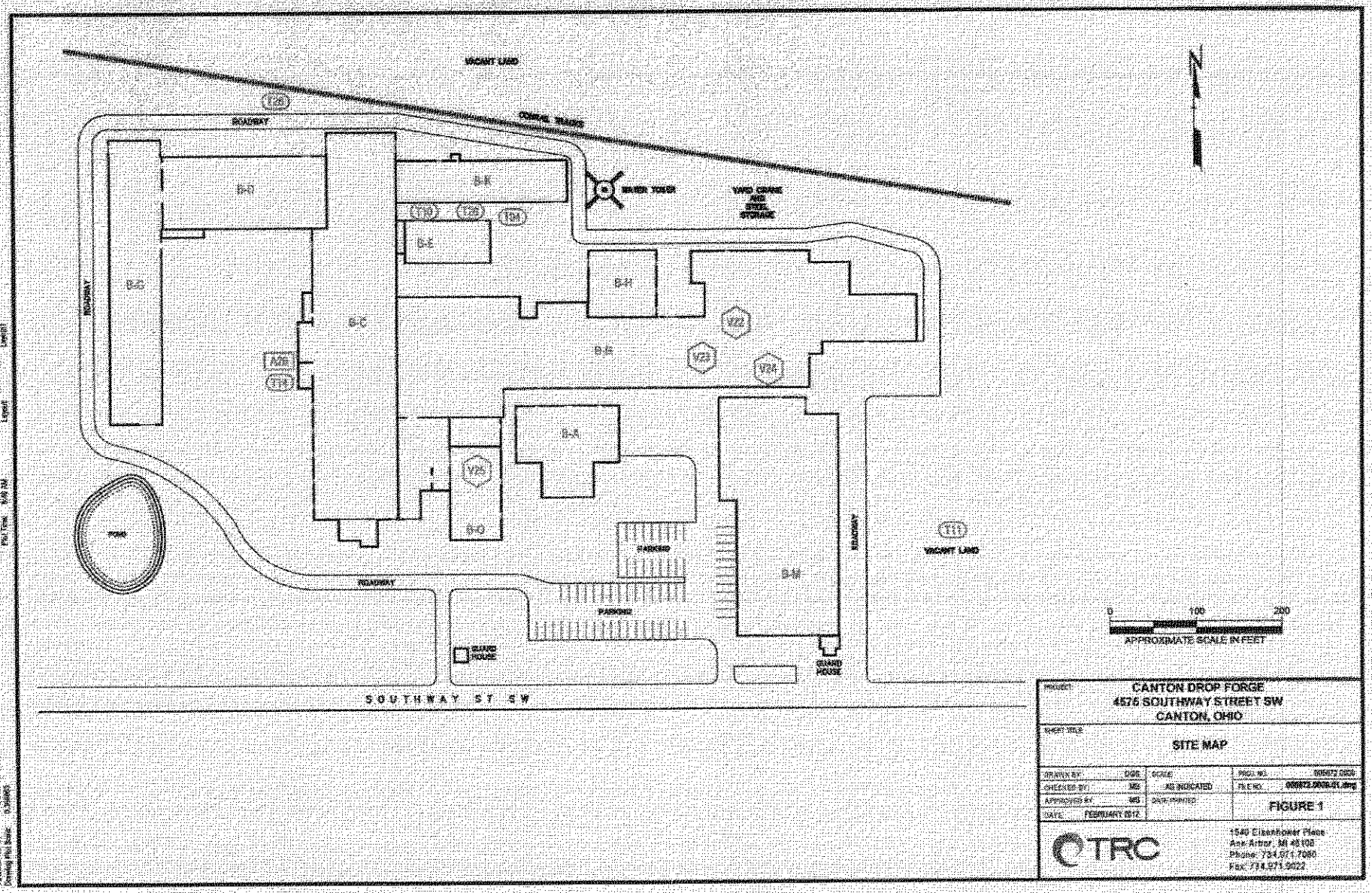


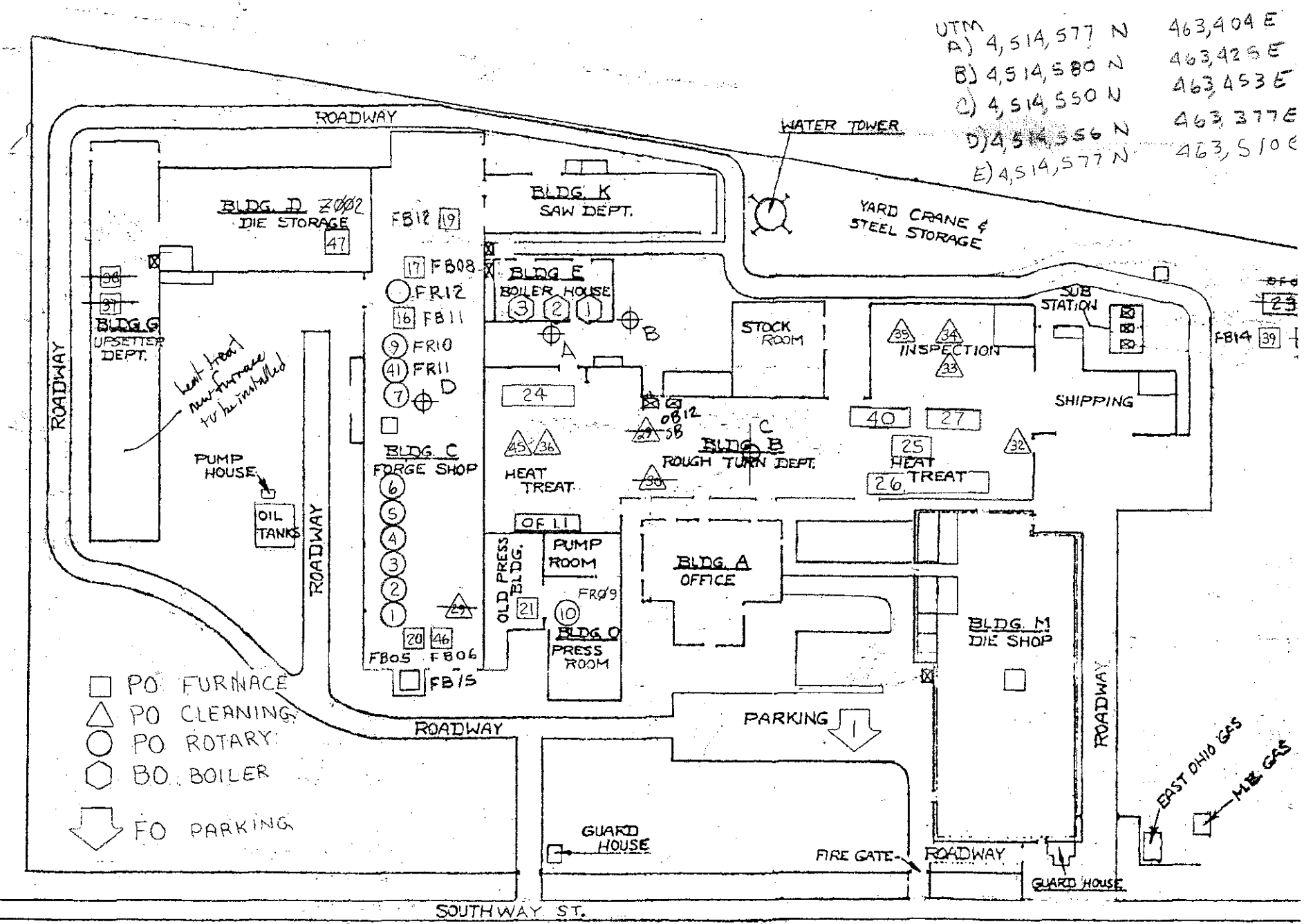
Canton Drop Forge 55 by Mike Beedle,2012/08/07 14:00:36

ATTACHMENT B

Site Diagrams

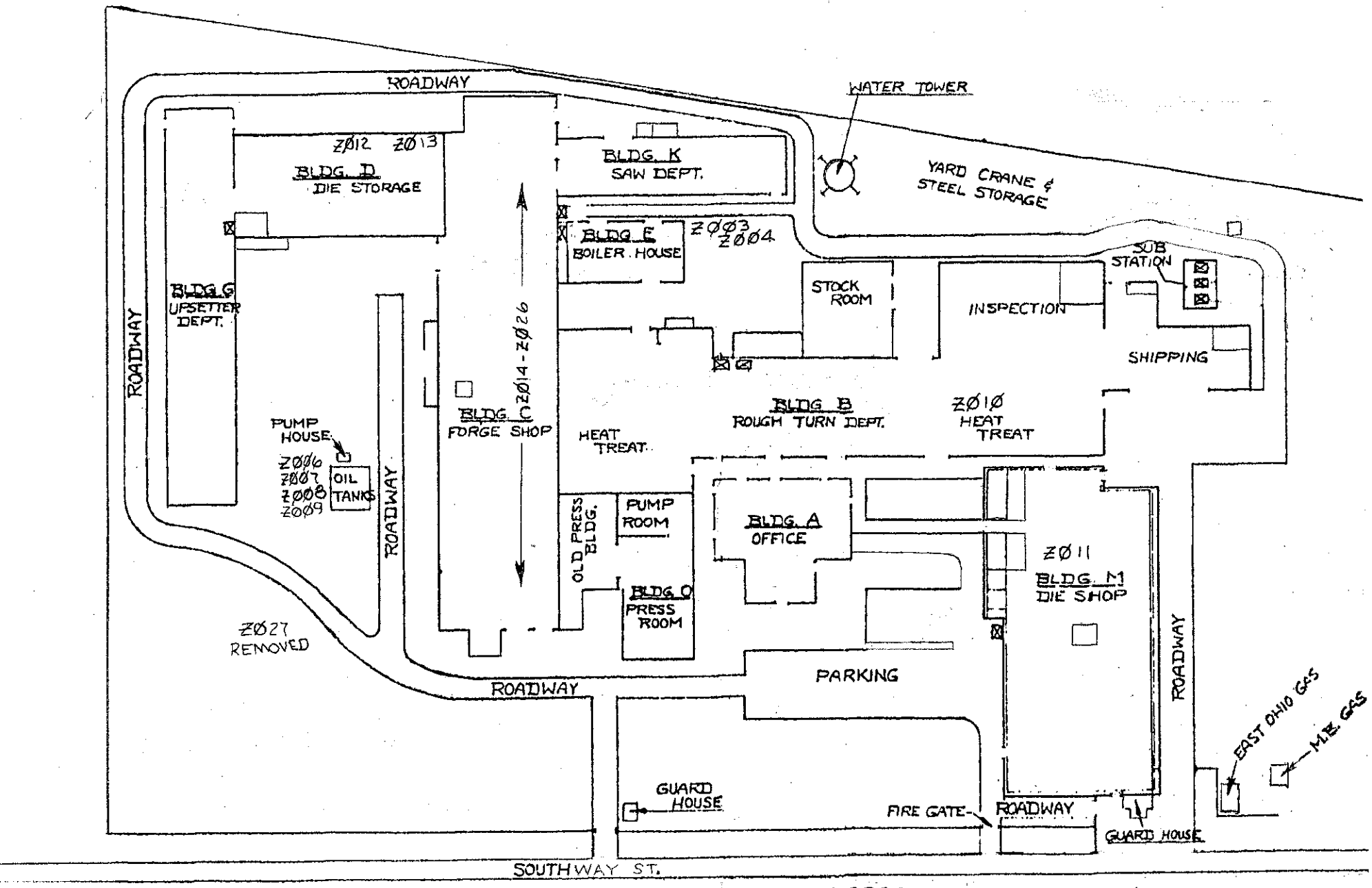

VACANT LAND
NORTH
CONRAIL TRACKS
CDF YARD CRANE &
STEEL STORAGE
WATER TOWER
BUILDING D
DIE STORAGE
BUILDING K
SAW DEPT.
BUILDING E
BOILER HOUSE
SUB STATION
LIGHT INDUSTRIAL
BUILDING G
UPSETTER
DEPT.
STOCK ROOM
INSPECTION
SHIPPING
BUILDING B
ROUGH TURN DEPT.
HEAT TREAT
HEAT TREAT
BUILDING C
FORGE SHOP
PUMP
ROOM
OLD PRESS
BUILDING
BUILDING A
OFFICE
480v FEED
DIESHOP TO MIS
POWER SUPPLY
18'
18' DOWN
4'
11'
11'-6"
BUILDING D
PRESS
ROOM
BUILDING M
DIE SHOP
VACANT LAND
AT&T LINE
PARKING
PARKING
EAST OHIO GAS
M. E. GAS
GUARD
HOUSE
GATE
100'
GATE
GUARD
HOUSE
POLE
GATE
SOUTHWAY STREET SW
NORTHEAST
OHIO GAS
LIGHT INDUSTRIAL
DATE
CDF
CANTON DROP FORGE
UTILITIES


VACANT LAND
CONRAIL TRACKS
ROADWAY
WATER TOWER
YARD CRANE AND STEEL STORAGE
B-D
B-K
B-E
B-G
B-C
B-H
B-B
B-A
B-O
B-M
V22
V23
V24
V25
T10
T26
T04
T14
T11
A26
POND
PARKING
GUARD HOUSE
SOUTHWAY ST SW
N
0
100
200
APPROXIMATE SCALE IN FEET
PROJECT
CANTON DROP FORGE
4575 SOUTHWAY STREET SW
CANTON, OHIO
SHEET TITLE
SITE MAP
DRAWN BY DGS
CHECKED BY MS
APPROVED BY MS
DATE FEBRUARY 2012
SCALE AS INDICATED
DATE PRINTED
PROJ. NO.
FILE NO.
FIGURE 1
TRC
1540 Eisenhower Place
Ann Arbor, MI 48108
Phone: 734.971.7080
Fax: 734.971.9022



CANTON DROP FORGE
EPA PERMIT LOCATIONS

KEITH
2-23-93
5-06-04
7-10-06



CANTON DROP FORGE
EPA STATE ONLY LOCATIONS

KEITH
06/19/08

ATTACHMENT C

Site Brochure

ATTACHMENT D

Checklists

Canton Drop Forge

USED OIL INSPECTION CHECKLIST
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS

NOTE: A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.

PROHIBITIONS			
1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes: pond 1 + 2		Yes ☑ No ☐ N/A ☐
	a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes ☐ No ☑ N/A ☐
NOTE: For example, used oil contaminated scrap metal stored in a pile.			
2.	Is used oil used as a dust suppressant? [3745-279-12(B)]		Yes ☐ No ☑ N/A ☐
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?		Yes ☑ No ☐ N/A ☐
NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., If generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).			
GENERATOR STANDARDS			
4.	Does the generator mix hazardous waste with used oil? If so,		Yes ☐ No ☑ N/A ☐
	a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes ☐ No ☐ N/A ☑
NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.			
5.	Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)] Place no rebuttable presumption		Yes ☐ No ☐ N/A ☐
NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.			
6.	Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]		Yes ☐ No ☐ N/A ☐
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]		Yes ☐ No ☐ N/A ☐
8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] 2 tanks corrected during inspection		Yes ☐ No ☑ N/A ☐
9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]		Yes ☐ No ☐ N/A ☐
	a.	Stopped the release?	Yes ☐ No ☐ N/A ☐
	b.	Contained the release?	Yes ☐ No ☐ N/A ☐
	c.	Cleaned up and properly managed the used oil and other materials?	Yes ☐ No ☐ N/A ☐
	d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes ☐ No ☐ N/A ☐
ON-SITE BURNING IN SPACE HEATER			
10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:		
	a.	Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?	Yes ☐ No ☐ N/A ☑

	b.	Is the heater designed to have a maximum capacity of not more that 0.5 million BTU per hour?	Yes ☐ No ☐ N/A ☑
	c.	Are the combustion gases from heater vented to the ambient air?	Yes ☐ No ☐ N/A ☑
NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).			
GENERATOR TRANSPORTATION			
11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24]		Yes ☐ No ☐ N/A ☑
12.	If the generator self-transports used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]		NA
	a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24]	Yes ☐ No ☐ N/A ☑
	b.	Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24]	Yes ☐ No ☐ N/A ☑
NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).			
COLLECTION CENTERS AND AGGREGATION POINTS			NA
13.	Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]		Yes ☐ No ☐ N/A ☐
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]		Yes ☐ No ☐ N/A ☐
15.	Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]		Yes ☐ No ☐ N/A ☐
NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.			

Contact Drop Force 8/6/12 8/8/12

SMALL QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET

CESQG: ≤100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.
SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.
LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month.
NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

GENERAL REQUIREMENTS

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11] No Dross No Shot	Yes ☐ No ☑ N/A ☐
2.	Has the generator obtained a U.S. EPA I.D. number? [3745-52-12]	Yes ☑ No ☐ N/A ☐
3.	Has the generator transported or caused to be transported hazardous waste to **other** than a facility authorized to manage the hazardous waste? [ORC 3734.02 (F)] Not of material shipped as HAZ	Yes ☐ No ☑ N/A ☐
4.	Has the generator disposed of hazardous waste **on-site without a permit** or at another facility **other** than a facility authorized to dispose of hazardous waste? [ORC 3734.02 (E) & (F)] Not of material sent as HAZ 7. Dross Shot	Yes ☐ No ☑ N/A ☐
5.	Does the generator accumulate hazardous waste? Sporadic	Yes ☑ No ☐ N/A ☐

NOTE: If the SQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements might still apply, e.g. manifest, marking, LDR, etc.

6.	Has the generator accumulated hazardous wastes in excess of (180/270) days without a permit or an extension from the Director? [3745-52-34; ORC §3734-02(E)&(F)]	Yes ☐ No ☑ N/A ☐

NOTE: SQG's shipping waste to a facility greater than 200 miles away can accumulate on-site for 270 days. [3745-52-34 (E)]

7.	Is the generator accumulating more than 6,000 kg on site? [3745-52-34(D)]	Yes ☐ No ☑ N/A ☐

NOTE: 6,000 kg = approximately 27, 55-gallon drums. If the facility is accumulating waste for greater than 180/270 days without an extension/permit or is accumulating greater than 6,000 kg on-site, it is classified as a storage facility and TSD standards apply. Complete applicable TSD checklists.

8.	Does the generator treat hazardous waste in a:		
	a.	Container that meets 3745-66-70 to 3745-66-77?	Yes ☐ No ☐ N/A ☑
	b.	Tank that meets 3745-66-101?	Yes ☐ No ☐ N/A ☑
	c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes ☐ No ☐ N/A ☑
	d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes ☐ No ☐ N/A ☑

NOTE: Complete appropriate checklist for each unit.

NOTE: If waste is treated to meet LDRs, use LDR checklist.

MANIFEST REQUIREMENTS

9.		Are all hazardous wastes either reclaimed under a contractual agreement as defined in OAC rule 3745-52-20(E), or shipped off-site accompanied by a manifest (U.S. EPA Form 8700-22)? [3745-52-20(A)(1)] Dross / Shot? other waste ok	Yes ☑ No ☐ N/A ☐
10.		Are wastes reclaimed under a contractual agreement? If so: [3745-52-20(E)] N/A	Yes ☐ No ☐ N/A ☑
	a.	Does the contractual agreement specify the type of waste and frequency of shipment?	Yes ☐ No ☐ N/A ☑
	b.	Is the transport vehicle owned and operated by the reclaimer?	Yes ☐ No ☐ N/A ☑

	c.	Is a copy of the reclamation agreement kept on-site for at least three years after termination/expiration of the agreement?	Yes ☐ No ☐ N/A ☑
NOTE: If wastes are reclaimed under a contractual agreement and an answer to questions 10(a) through 10(c) is no, the generator is in violation of 3745-52-20 (A) (B) & (D), 3745-52-22 and 3745-52-23. Even if the waste is being reclaimed under agreement, LDRs still apply. Complete LDR checklist.			
11.		Have items 1 through 20 of each manifest been completed? [3745-52-20(A)(1)] & [3745-52-27(A)]	Yes ☑ No ☐ N/A ☐
NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations, items (21) through (35) must also be complete. [3745-52-20(A)(1)]			
12.		Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes ☑ No ☐ N/A ☐
NOTE: The generator may designate on the manifest one alternative facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)]			
13.		If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternative TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	Yes ☐ No ☐ N/A ☑
14.		Have the manifests been signed by the generator and initial transporter? [3745-52-23 (A) (1) and (2)]	Yes ☑ No ☐ N/A ☐
NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have made a good faith effort to minimize their waste generation.			
15.		If the generator did not receive a return copy of each completed manifest within 60 days of being accepted by the transporter did the generator submit to Ohio EPA, a copy of the manifest with some indication that the generator has not received confirmation of delivery? [3745-52-42(B)]	Yes ☐ No ☐ N/A ☑
16.		Are signed copies of all manifests being retained for at least three years? [3745-52-40]	Yes ☑ No ☐ N/A ☐
NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.			
PREPAREDNESS AND PREVENTION			
17.		Is an emergency coordinator available at all times (on-site or on-call)? [3745-52-34(D)(5)(a)]	Yes ☑ No ☐ N/A ☐
18.		Has the following been posted by the telephone: [3745-52-34(D)(5)(b)]	
	a.	Name and telephone number of emergency coordinator?	Yes ☑ No ☐ N/A ☐
	b.	Location of fire and spill control equipment, and, if present, fire alarm(s)? Not inspected	Yes ☐ No ☐ N/A ☐
	c.	Telephone number of local fire department?	Yes ☑ No ☐ N/A ☐
19.		Are employees familiar with waste handling and emergency procedures? [3745-52-34(D)(5)(c)]	Yes ☐ OK No ☐ N/A ☐
20.		Has the facility properly responded to all fires and spills? [3745-52-34(D)(5)(d)]	Yes ☐ No ☐ N/A ☑
21.		Is the facility operated to minimize the possibility of fire, explosion, or any unplanned sudden or nonsudden release of hazardous waste? [3745-65-31] Shut? drops?	Yes ☑ No ☐ N/A ☐
22.		Does the generator have the following equipment at the facility if it is required due to actual hazards associated with the waste:	
	a.	Internal Alarm system? [3745-65-32(A)]	Yes ☑ No ☐ N/A ☐

	b.	Emergency communication device? [3745-65-32(B)]	Yes ☑ No ☐ N/A ☐
	c.	Portable fire control, spill control and decon equipment? [3745-65-32(C)]?	Yes ☑ No ☐ N/A ☐
	d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)] 140,000 water Tower	Yes ☑ No ☐ N/A ☐
23.	Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]		Yes ☑ No ☐ N/A ☐
	a.	Are inspections recorded in a log or summary? [3745-65-33]	Yes ☑ No ☐ N/A ☐
24.	Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (*unless the device is not required under OAC 3745-65-32)? [3745-65-34(A)]*		Yes ☐ No ☐ N/A ☐
25.	If there is only one employee on the premises is there immediate access to a device (ex. phone, hand-held two-way radio) capable of summoning external emergency assistance (*unless not required under OAC 3745-65-32*)? [3745-65-34(B)]		Yes ☐ No ☐ N/A ☑
26.	Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]		Yes ☐ No ☐ N/A ☑
27.	Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)]		Yes ☑ No ☐ N/A ☐
28.	Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]		Yes ☐ No ☐ N/A ☑
SATELLITE ACCUMULATION AREA REQUIREMENTS			None observed
29.	Does the generator ensure that satellite accumulation area(s):		
	a.	Are at or near a point of generation? [3745-52-34(C)(1)]	Yes ☐ No ☐ N/A ☑
	b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes ☐ No ☐ N/A ☐
	c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes ☐ No ☐ N/A ☐
	d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	Yes ☐ No ☐ N/A ☐
	e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]	Yes ☐ No ☐ N/A ☐
	f.	Containers are marked with the words "Hazardous Waste" <u>or</u> other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes ☐ No ☐ N/A ☐
30.	Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:		Yes ☐ No ☐ N/A ☐
	a.	Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]	Yes ☐ No ☐ N/A ☐
	b.	Did the generator mark the container(s) holding the excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]	Yes ☐ No ☐ N/A ☑ None

NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.

USE AND MANAGEMENT OF CONTAINERS			
31.	Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(D)(4)]		Yes ☐ No ☐ N/A ☑ None observed

None Observed

32.	Is the accumulation date on each container? [3745-52-34(D)(4)]		Yes ☐ No ☐ N/A ☐
33.	Are hazardous wastes stored in containers which are:		
	a.	Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes ☐ No ☐ N/A ☐
	b.	In good condition? [3745-66-71]	Yes ☐ No ☐ N/A ☐
	c.	Compatible with wastes stored in them? [3745-66-72]	Yes ☐ No ☐ N/A ☐
	d.	Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes ☐ No ☐ N/A ☐
NOTE: Record location on process summary sheets and photograph the area.			
34.	Is the container accumulation area(s) inspected at least weekly? [3745-66-74] Per ORC§1.44(A) "Week" means seven(7) consecutive days.		Yes ☐ No ☐ N/A ☐
	a.	Are inspections recorded in a log or summary? [3745-66-74]	Yes ☐ No ☐ N/A ☐
35.	Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)]		Yes ☐ No ☐ N/A ☐
36.	If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)]		Yes ☐ No ☐ N/A ☐
37.	If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)]		Yes ☐ No ☐ N/A ☐
NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.			
PRE-TRANSPORT REQUIREMENTS			
38.	Does each generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)]		Yes ☐ No ☐ N/A ☐ None Observed
39.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]		Yes ☐ No ☐ N/A ☐ None Observed
40.	Before off-site transportation, does the generator placard <u>or</u> offer the appropriate DOT placards to the initial transporter? [3745-52-33]		Yes ☐ No ☐ N/A ☐ Not Observed

Canton Drop Forge 8-6-12 - 8-8-12 Inspection

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS			
Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more			
Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less			
PROHIBITIONS			
1.	Did the SQUWH dispose of universal waste? [3745-273-11(A)]	Yes ☐ No ☑ N/A ☐	
2.	Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-17 or managing specific wastes as provided in OAC rule 3745-273-13? [3745-273-11(B)]	Yes ☐ No ☑ N/A ☐	
WASTE MANAGEMENT AND LABELING/MARKING			
UNIVERSAL WASTE BATTERIES None per Sean D.			
3.	Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)]	Yes ☐ No ☐ N/A ☐	
4.	If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)]	Yes ☐ No ☐ N/A ☐	
5.	Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)]	Yes ☐ No ☐ N/A ☐	
6.	If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of hazardous waste? [3745-273-13(A)(3)]	Yes ☐ No ☐ N/A ☐	
a.	If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]	Yes ☐ No ☐ N/A ☐	
b.	If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]	Yes ☐ No ☐ N/A ☐	
7.	Are the batteries or containers of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)?" [3745-273-14(A)]	Yes ☐ No ☐ N/A ☐	
UNIVERSAL WASTE PESTICIDES None			
8.	Does the SQUWH prevent releases to the environment by managing pesticides in containers that are closed, structurally sound, compatible with the pesticides, and lack evidence of leakage, spillage, or damage? [3745-273-13(B)(1)]	Yes ☐ No ☐ N/A ☐	
9.	If the original pesticide container is in poor condition, was it over-packed into an acceptable container? [3745-273-13(B)(2)]	Yes ☐ No ☐ N/A ☐	
10.	If the pesticide is stored in a tank, are the requirements of rules 3745-66-90 through 3745-66-101, except for paragraph (C) of 3745-66-97; 3745-66-100 and 3745-66-101 of the OAC met? (Use tank checklist) [3745-273-13(B)(3)]	Yes ☐ No ☐ N/A ☐	
11.	If pesticides are stored in a transport vehicle, is it closed, structurally sound, compatible with the pesticide(s), and does it lack evidence of leakage, spillage, or damage that could cause leakage? [3745-273-13(B)(4)]	Yes ☐ No ☐ N/A ☐	
12.	Are recalled universal waste pesticides that are in containers, tanks, or transport vehicles labeled with the label that was on or accompanied the product as sold or distributed and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-14(B)(1)&(2)]	Yes ☐ No ☐ N/A ☐	
13.	Are unused pesticide products that are in containers, tanks, or transport vehicles labeled with either the label that was on the product when purchased (if still legible), the appropriate DOT label, or the designated label prescribed by the pesticide collection program and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-14(C)(1)&(2)]	Yes ☐ No ☐ N/A ☐	
UNIVERSAL WASTE THERMOSTATS None			

VDNC

14.	Have thermostats that show evidence of leakage, spillage or damage that could cause leaks been contained in a container that is closed, structurally sound, compatible with contents of the thermostats and lacks evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(C)(1)]		Yes ☐ No ☐ N/A ☐
15.	If the mercury-containing ampules are removed, does the SQUWH: [3745-273-13(C)(2)]		
	a.	Remove the ampules in a manner to prevent breakage and is the removal done over or in a containment device? [3745-273-13(C)(2)(a)&(b)]	Yes ☐ No ☐ N/A ☐
	b.	Have a clean-up system readily available to transfer spilled mercury to another container that meets the requirements of OAC rule 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-13(C)(2)(c)&(d)]	Yes ☐ No ☐ N/A ☐
	c.	Ensure that the area where ampules are removed is well ventilated and monitored in compliance with applicable OSHA exposure levels for mercury? [3745-273-13(C)(2)(e)]	Yes ☐ No ☐ N/A ☐
	d.	Ensure that employees are thoroughly familiar with the proper waste handling and emergency procedures? [3745-273-13(C)(2)(f)]	Yes ☐ No ☐ N/A ☐
	e.	Ensure that removed ampules are stored in closed, non-leaking containers that are in good condition? [3745-273-13(C)(2)(g)]	Yes ☐ No ☐ N/A ☐
	f.	Pack removed ampules in containers with packing material to prevent breakage during storage, handling and transportation? [3745-273-13(C)(2)(h)]	Yes ☐ No ☐ N/A ☐
16.	When removing mercury containing ampules from thermostats if there are mercury or clean-up residues resulting from spills or leaks, and/or other waste generated (e.g., remaining thermostat units), has it been determined whether those exhibit a characteristic of hazardous waste identified in OAC rules 3745-51-20 to 3745-51-24? [3745-273-13(C)(3)(a)]		Yes ☐ No ☐ N/A ☐
	a.	If the residues, and/or wastes are characteristic, are they managed in compliance with Chapters 3745-50 through 3745-69, 3745-205, 3745-256, 3745-266, and 3745-270 of the Administrative Code? (The handler is considered the generator of the mercury, residues, and/or other waste and is subject to OAC Chapter 3745-52) [3745-273-13(C)(3)(b)]	Yes ☐ No ☐ N/A ☐
17.	Are thermostats or containers of thermostats labeled either "Universal Waste-Mercury Thermostat(s)" or "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)?" [3745-273-14[D]		Yes ☐ No ☐ N/A ☐
UNIVERSAL WASTE LAMPS			
18.	Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)]		Yes ☑ No ☐ N/A ☐
19.	Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)]		Yes ☒ No ☐ N/A ☐
NOTE: ***Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)].*** *A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC rule 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility using a hazardous waste manifest.*			
20.	Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)?" [3745-273-14(E)]		Yes ☒ No ☐ N/A ☐

SD 5½ months 6/14/12 KH no manifest of shipments

ACCUMULATION TIME			
21.	Is the waste accumulated for less than one year? [3745-273-15(A)] Not Shipped		Yes ☐ No ☐ N/A ☐
	a.	If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)]	Yes ☐ No ☐ N/A ☐
NOTE: Accumulation is defined as date generated or date received from another handler.			
22.	Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-15(C)] If yes, describe below:		Yes ☐ No ☐ N/A ☐
EMPLOYEE TRAINING			
23.	Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16] Tool box Trainings		Yes ☑ No ☐ N/A ☐
RESPONSE TO RELEASES			None Observe
24.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]		Yes ☐ No ☐ N/A ☐
25.	Is the material released characterized? [3745-273-17(B)]		Yes ☐ No ☐ N/A ☐
26.	If the material released is a hazardous waste, was it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to OAC Chapter 3745-52) [3745-273-17(B)]		Yes ☐ No ☐ N/A ☐
OFF-SITE SHIPMENTS			
NOTE: If a SQUWH self-transports waste, then the handler must comply with the Universal Waste transporter requirements.			None prior to Inspect
27.	Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)] nothing		Yes ☐ No ☐ N/A ☐
28.	Is the handler aware of DOT requirements for packaging and shipping? If no, make aware of 49 CFR 171-180.		Yes ☐ No ☐ N/A ☐
29.	Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-18(D)]		Yes ☐ No ☐ N/A ☐
30.	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?		Yes ☐ No ☐ N/A ☐
	a.	If yes, did the originating handler receive the waste back or agree to where the shipment was sent? [3745-273-18(E)(2)]	Yes ☐ No ☐ N/A ☐
31.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss and do <u>one of the following</u>:		Yes ☐ No ☐ N/A ☐
	a.	Send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-18(F)(2)] (this change makes it like the LQUWH checklist)	Yes ☐ No ☐ N/A ☐
32.	If the handler received a shipment of hazardous waste that was not a universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]		Yes ☐ No ☐ N/A ☐
EXPORTS			None

None

33.	Is waste being sent to a foreign destination? If so:		Yes ☐ No ☐ N/A ☐
	a.	Does the small quantity handler comply with primary exporter requirements in OAC rules 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)]	Yes ☐ No ☐ N/A ☐
	b.	Is waste exported only upon consent of the receiving country and in conformance with the U.S. EPA "Acknowledgment of Consent" as defined in OAC rules 3745-52-50 to 3745-52-57? [3745-273-20(B)]	Yes ☐ No ☐ N/A ☐
	c.	Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]	Yes ☐ No ☐ N/A ☐

ATTACHMENT E

Manifests

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: OHD004465142
2. Page 1 of 1
3. Emergency Response Phone: 330-477-4511
4. Manifest Tracking Number: 001587921 FLE

GENERATOR

5. Generator's Name and Mailing Address

Canton Drop Forge
4575 Southway Street, SW Canton, OH 44706

Generator's Phone: 330-477-4511

Generator's Site Address (if different than mailing address)

6. Transporter 1 Company Name: Envirite of Ohio, Inc.
U.S. EPA ID Number: OHD980568992

7. Transporter 2 Company Name
U.S. EPA ID Number

8. Designated Facility Name and Site Address

Envirite of Ohio, Inc.
2050 Central Ave SE
Canton, OH 44707

Facility's Phone: (800) 715-5805

U.S. EPA ID Number: OHD980568992

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. RQ, Waste corrosive Liquid, Acidic, Inorganic, n.o.s., (Hydrochloric Acid), 8, UN3264, PGII	1	TT	4043	G	D002		
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information

9b1. C 7071 - ERG #154

1.05 8.70

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Michael L. Slates
Signature: [signature]
Month 07 Day 06 Year 07

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: RON LORENZ
Signature: Ron Lorenz
Month 07 Day 06 Year 07

Transporter 2 Printed/Typed Name
Signature
Month Day Year

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number

Facility's Phone: 2.1

18c. Signature of Alternate Facility (or Generator) 7.10
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1. H077 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: JOHN ECKHARDT
Signature: [signature]
Month 07 Day 06 Year 07

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR

7941

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: [illegible]
2. Page 1 of: 1
3. Emergency Response Phone: 1-800-468-1760
4. Manifest Tracking Number: 002580345 SKS

5. Generator's Name and Mailing Address
CANTON DROP FORGE INC
4575 SOUTHWAY ST. SW
CANTON OH 44706
Generator's Phone: 330-477-4511

Generator's Site Address (if different than mailing address)

6. Transporter 1 Company Name: SAFETY-KLEEN SYSTEMS, INC.
U.S. EPA ID Number: TXR000050320

7. Transporter 2 Company Name
U.S. EPA ID Number

8. Designated Facility Name and Site Address
SAFETY-KLEEN SYSTEMS, INC.
3700 LAGRANGE ROAD
SMITHFIELD KY 40068
Facility's Phone: 502-845-2458
U.S. EPA ID Number: KYD053348106

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. RQ UNLESS WASTE PAINT RELATED MATERIALS 3 PG II (D001)	1	DM	40	P	F003 F005 D001 D035 D040 D043
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
BK SHIPMENT#[illegible] 54187968 10063487 D001
VENDOR:
24 HR EMERGENCY #1-800-468-1760 (SAFETY-KLEEN - CONTRACT #9216A)
[illegible]

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: [illegible] Signature: [illegible] Month Day Year

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: [illegible] Signature: [illegible] Month Day Year
Transporter 2 Printed/Typed Name: Signature: Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator) U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator) Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name Signature Month Day Year

GENERATOR | INT'L | TRANSPORTER | DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete. GENERATOR'S INITIAL COPY

U4800553/127B3

BILL OF LADING/MANIFEST

1. Shipper's US EPA ID No. (If Applicable)

Document No. 29360

2. Page 1 of

3. Shipper's Name and Mailing Address
CESQG
CANTON DROP FORGE INC
4575 SOUTHWAY ST. SW
CANTON OH 44706

4. Shipper's Phone ([illegible]) [illegible]

5. Transporter 1 Company Name	6. US EPA ID Number	A. Transporter's Phone
[illegible]		
7. Transporter 2 Company Name	8. US EPA ID Number	B. Transporter's Phone
[illegible] SYSTEMS, INC.	[illegible]	[illegible]
9. Designated Facility Name and Site Address	10. US EPA ID Number	C. Facility's Phone
7407 SAFETY-KLEEN SYSTEMS, INC. 633 E 138TH ST DOLTON, IL 60419	ILD980613913	708-225-8100

11. Shipping Name and Description

	HM		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
a.	X	BATTERIES, WET, FILLED WITH ACID 8 UN2794 PGIII RQ(LEAD) (UNIVERSAL WASTE)	1	DF	50	P
b.						
c.						
d.						

15. Special Handling Instruction and Additional Information

SK SHIP# 204080924 10069427

24 HR EMERGENCY #1-800-468-1760 (SAFETY-KLEEN - CONTRACT #94138)
SK AUTHORIZED TO RETAIN LICENSED SUBSEQUENT CARRIERS AS NECESSARY

DOT/PRFL A. 400111/12244 B. C. D.

A) NONE B) C) D)

SHIPPER

USE 16A OR 16B

16a. US DOT HAZARDOUS MATERIALS SHIPPER'S CERTIFICATION: "This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

Printed/Typed Name: Keith J. Houseknecht

Signature required here if US DOT regulated: [signature] Month 5 Day 19 Year 11

16b. NON-REGULATED SHIPPER'S CERTIFICATION: I certify the materials described above on this form are not subject to federal regulations for Transportation or Disposal.

Printed/Typed Name

Sign here if material is not DOT regulated: Month Day Year

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: [illegible]

Signature: [signature] Month 5 Day 19 Year 11

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of materials covered by this form except as noted in Item 19.

Printed/Typed Name

Signature Month Day Year

IN EVENT OF EMERGENCY CALL 1-800-468-1760 (24 hours)

GENERATOR'S COPY

FORM NO. 01-90291 (9/08)

SAFETY-KLEEN 05/17/2011 PAGE:1
PLANT: 7041 LDR NOTIFICATION FORM 03:20:10
GENERATOR NAME: CANTON DROP FORGE INC MANIFEST NO.: 2580345510
OR SALES SERVICE NO.:
SK Shipping #: 204080897 CUST#: 10069427
Pursuant to 40 CFR 268.7(a), I hereby notify that this shipment contains waste restricted under 40 CFR part 268 land disposal restrictions (LDR).

A. GENERAL WASTE NOTIFICATION

LDR FORM LINE NO.: 1 MANIFEST PAGE/LINE# 01/001 SK PRFL NO.: 0000012185
SKDOT#: 0400053

EPA WASTE CODES & LDR SUBCATEGORIES (IF ANY):
D001 LQ LIQUID >= 10% TOC
D005
D006
D007
D008
D035
F003
F005
Treatability group: NWW Non-Wastewater
Waste Constituent Notification:

Legend Number	Constituent
103	CYCLOHEXANONE
152	ETHYL ACETATE
154	ETHYL BENZENE
173	ISOBUTYL ALCOHOL
178	METHANOL
183	METHYLENE CHLORIDE
184	METHYL ETHYL KETONE
185	METHYL ISOBUTYL KETONE
217	PHTHALIC ANHYDRIDE
229	TETRACHLOROETHYLENE
231	TOLUENE
235	1,1,1-TRICHLOROETHANE
237	TRICHLOROETHYLENE
245	XYLENES-MIXED ISOMERS (SUM OF O-, M-, AND P-XYLENE CONCENTRATIONS)
248	BARIUM
250	CADMIUM
251	CHROMIUM (TOTAL)
255	LEAD
258	NICKEL
51	ACETONE
77	N-BUTYL ALCOHOL

NOTES
EXP NOTICE: THIS LDR EXPIRES ON 12/31/2011

GENERATOR'S AUTHORIZED SIGNATURE
NAME & TITLE (PRINTED OR TYPED)
5 / 19 / 11
DATE
PLANT: 7041 CSG: REF#: SW:
TOP COPY: GENERATOR MIDDLE COPY: FACILITY BOTTOM COPY: TRANSFE

ATTACHMENT F

OEPA NOV

Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

June 15, 2011

KEITH J HOUSEKNECHT
CANTON DROP FORGE INC
4575 SOUTHWAY ST SW
CANTON, OH 44706

Re: Return to Compliance – Receipt of 2009 Hazardous Waste Annual Report CANTON DROP FORGE INC, CANTON - OHD004465142

Dear KEITH J HOUSEKNECHT:

I am writing to notify you that I received the 2009 Hazardous Waste Annual Report for your site on November 4, 2010. This report was requested by me in a letter dated October 14, 2010, indicating that Canton Drop Forge, Inc had not submitted a report for hazardous wastes generated during 2009. The report has been processed and entered into Ohio EPA's Annual Report database, and the violation has been abated.

I recommend you file this letter with your Annual Report records in case there are any questions during an inspection. Feel free to contact me in the future at (614) 644-2891 or *maryann.silagy@epa.state.oh.us*.

Sincerely,

Mary Ann Silagy

Mary Ann Silagy, Environmental Specialist 2
Environmental Research and Information Services
Ohio EPA - Division of Materials and Waste Management
614-644-2891
maryann.silagy@epa.state.oh.us

cc: Central File
DHWM, NEDO

NOTICE:
Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.

State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.state.oh.us

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

October 14, 2010

KEITH J HOUSEKNECHT
CANTON DROP FORGE INC
4575 SOUTHWAY ST SW
CANTON, OH 44706

Re: 2009 Hazardous Waste Annual Report Requirement – Notice of Violation
CANTON DROP FORGE INC, CANTON - OHD004465142

Dear KEITH J HOUSEKNECHT:

My review of customer data from Ohio Treatment, Storage, and Disposal Facilities (TSDFs) has revealed that one or more shipments of hazardous waste were received from CANTON DROP FORGE INC during the 2009 calendar year. The total amount reported is approximately 15.62 tons as shown on the enclosed printout. This total indicates that CANTON DROP FORGE INC was a large quantity generator in 2009. Because I have not received a Hazardous Waste Annual Report for 2009, CANTON DROP FORGE INC may be in violation of Rule 3745-52-41 of the Ohio Administrative Code (OAC).

A large quantity generator is defined as a site which generates in any single month more than 1000 kg (2200 lbs) of non-acute hazardous waste or more than 1 kg (2.2 lb) of acutely hazardous waste. This includes wastes from one-time generation as well as wastes from ongoing production processes. Generating hazardous waste above the threshold quantity for only one month will subject a site to the Annual Report requirement. OAC Rule 3745-52-41 requires a generator who ships any hazardous waste off-site to prepare and submit to the Ohio EPA a Hazardous Waste Annual Report and to describe and certify efforts that were made to minimize hazardous wastes. These reports are due March 1 of each year and contain information about the activities of the previous calendar year. Only small quantity generators (between 220 and 2200 lb/mo of non-acutely hazardous wastes) and conditionally exempt small quantity generators (less than 220 lb/mo of non-acutely hazardous wastes) are exempt from the Annual Report requirement as described in OAC Rule 3745-52-44.

To abate the violation of OAC Rule 3745-52-41, CANTON DROP FORGE INC must complete and submit to Ohio EPA a 2009 Hazardous Waste Annual Report within 30 days of receipt of this letter. Failure to respond to this Notice of Violation may result in referral to the Compliance Assurance Section for consideration of escalated enforcement. The 2009 forms and instructions can be found in Adobe Acrobat PDF format at *http://www.epa.ohio.gov/dhwm/ann_report/ann_report_2009.aspx* . This same web site contains detailed information about filing electronically using the eDRUMS service in Ohio EPA's eBusiness Center (eBiz) at *https://ebiz.epa.ohio.gov/login.jsp.* The Responsible Official who will sign the report must have an eBiz account and PIN before they can apply for the service. Obtaining a PIN requires mailing to Ohio EPA a notarized signature and receiving the

PIN by return US mail. I encourage you to file electronically because it is efficient, easy to use, and prevents many common errors due to built-in error checking and validation.

CANTON DROP FORGE INC should have on file the manifest records necessary for completion of the reports. OAC Rule 3745-52-40 requires generators to keep a signed copy of each manifest for a period of at least three years from the date the waste was accepted by the initial transporter. Receiving facilities and transporters are under a similar requirement. If you need copies of the original manifest(s), contact them for assistance.

If CANTON DROP FORGE INC was not a large quantity generator in 2009, documentation must be submitted to this office within 30 days of receipt of this letter. This documentation must show that CANTON DROP FORGE INC did not generate more than the threshold quantity of hazardous waste in any month during 2009. If you believe that the information supplied by Ohio TSDFs is in error, please call me to discuss the discrepancy.

A letter that acknowledges receipt of the report will be sent to you after it is processed. I can answer questions concerning the Annual Report or eBiz at (614) 644-2891 or *maryann.silagy@epa.state.oh.us*. Your prompt attention to this matter is appreciated.

Sincerely,

Mary Ann Silagy

Mary Ann Silagy, Environmental Specialist 2
Regulatory and Information Services
Ohio EPA - Division of Hazardous Waste Management
maryann.silagy@epa.state.oh.us
614-644-2891

enclosures

cc: Central File
DHWM, NEDO

NOTICE:
Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.

OhioEPA

State of Ohio Environmental Protection Agency

2009 Annual Hazardous Waste Report

ENTER GENERATOR ID NUMBER

OHD004465142

Form OI – *Off-site Transporter and Receiving Facility Information*

1	A. EPA ID of transporter or receiving facility: OHD980568992	B. Name of transporter or receiving facility (40 characters max.): ENVIRITE OF OHIO, INC
	C. Handler type (check all that apply): [X] Transporter [X] Receiving Facility	D. Address of receiving facility (address not required for transporters): Street: 2050 CENTRAL AVE S.E. City: CANTON State: OH ZIP Code: 44707-
2	A. EPA ID of transporter or receiving facility: MAD039322250	B. Name of transporter or receiving facility (40 characters max.): CLEAN HARBORS ENVIRONMENTAL
	C. Handler type (check all that apply): [X] Transporter [ ] Receiving Facility	D. Address of receiving facility (address not required for transporters): Street: 2930 INDEPENDENCE ROAD City: CLEVELAND State: OH ZIP Code: 44115-
3	A. EPA ID of transporter or receiving facility: ARD069748192	B. Name of transporter or receiving facility (40 characters max.): CLEAN HARBORS EL DORADO
	C. Handler type (check all that apply): [ ] Transporter [X] Receiving Facility	D. Address of receiving facility (address not required for transporters): Street: 309 AMERICAN CIRCLE City: EL DORADO State: AR ZIP Code: 71730-
4	A. EPA ID of transporter or receiving facility: OHD000816629	B. Name of transporter or receiving facility (40 characters max.): SPRING GROVE RESOURCE RECOVERY
	C. Handler type (check all that apply): [ ] Transporter [X] Receiving Facility	D. Address of receiving facility (address not required for transporters): Street: 4879 SPRING GROVE AVE City: CINCINNATI State: OH ZIP Code: 45232-
5	A. EPA ID of transporter or receiving facility:	B. Name of transporter or receiving facility (40 characters max.):
	C. Handler type (check all that apply): [ ] Transporter [ ] Receiving Facility	D. Address of receiving facility (address not required for transporters): Street: City: State: ZIP Code: -

OhioEPA

State of Ohio Environmental Protection Agency

2009 Annual Hazardous Waste Report

ENTER GENERATOR ID NUMBER

OHD004465142

Form GM - *Generation and Management*

SEC. 1

A. Hazardous waste description (60 characters max.)

WASTE CORROSIVE LIQUID, ACID, INORGANIC

B. Hazardous waste codes

D002

More...

C. Source code: G02

Report the Management Method code ONLY if the Source code is G25.

Management Method code: H

D. Waste form code: W

SEC. 2

A. Quantity generated in the year prior to the reporting year: 0

B. Quantity generated in the reporting year: 3650

C. UOM: G — Density: 8.6 lbs/gal [X] sg [ ]

D. Was this waste treated, disposed of, or recycled **On-site** ?

[ ] Yes (continue to system 1)

[X] No (skip to SEC. 3)

On-site system 1 — RCRA-exempt unit? Yes [ ] No [ ]

On-site mgmt method: H

Quantity treated, disposed or recycled:

On-site system 2 — RCRA-exempt unit? Yes [ ] No [ ]

On-site mgmt method: H

Quantity treated, disposed or recycled:

SEC. 3

A. Was any of this waste shipped off-site in the reporting year?

[X] Yes (continue to box B)

[ ] No (skip to SEC. 4)

	B. EPA ID of facility to which waste was shipped	C. Management Method	D. Total quantity shipped in the reporting year
Site 1	OHD980568992	H077	3650
Site 2		H	
Site 3		H	
Site 4		H	
Site 5		H	

EPA 9028 (Rev. 12-04)

CONTINUE TO SECTION 4 →

SEC. 4	On-site Waste Storage and Inactive Disposal Units

If the site has a storage permit or is undergoing a formal closure of storage or disposal units, and waste remained in the unit(s) as of December 31, complete Box A.

Otherwise, skip Section 4.

A. As of December 31, did any of this waste remain on-site in: Yes ☐ No ☐

1. a greater than 90 day storage unit . . . ☐ ☐
   - ☐ a. generated/accumulated during the reporting year
   - ☐ b. generated/accumulated prior to the reporting year
2. an inactive disposal unit undergoing closure ☐ ☐

B. Storage or disposal method	Handling Code	Amount	UOM	Density
1				lbs/gal ☐ sg ☐
2				lbs/gal ☐ sg ☐
3				lbs/gal ☐ sg ☐
4				lbs/gal ☐ sg ☐

Comments:

Extra Waste Codes:

OhioEPA

State of Ohio Environmental Protection Agency

Annual Hazardous Waste Report

ENTER GENERATOR ID NUMBER

OHD004465142

Form **GM** – *Generation and Management*

SEC. 1	A. Hazardous waste description (60 characters max.) WASTE MERCURY		
	B. Hazardous waste codes D009	More...	
	C. Source code G15	Report the Management Method code ONLY if the Source code is G25. Management Method code H	D. Waste form code W

SEC. 2	A. Quantity generated in the year prior to the reporting year 0	B. Quantity generated in the reporting year 399	C. UOM P Density NA lbs/gal ☐ sg ☐	D. Was this waste treated, disposed of, or recycled On-site ? ☐ Yes (continue to system 1) ☒ No (skip to SEC. 3)
On-site system 1	RCRA-exempt unit? Yes ☐ No ☐	On-site mgmt method H	Quantity treated, disposed or recycled	
On-site system 2	RCRA-exempt unit? Yes ☐ No ☐	On-site mgmt method H	Quantity treated, disposed or recycled	

SEC. 3	A. Was any of this waste shipped off-site in the reporting year? ☒ Yes (continue to box B) ☐ No (skip to SEC. 4)		
	B. EPA ID of facility to which waste was shipped	C. Management Method	D. Total quantity shipped in the reporting year
Site 1	MAD039322250	H	399
Site 2		H	
Site 3		H	
Site 4		H	
Site 5		H	

EPA 9028 (Rev. 12-04)

CONTINUE TO SECTION 4 →

SEC. 4	On-site Waste Storage and Inactive Disposal Units

If the site has a storage permit or is undergoing a formal closure of storage or disposal units, and waste remained in the unit(s) as of December 31, complete Box A.

Otherwise, skip Section 4.

A. As of December 31, did any of this waste remain on-site in:

	Yes	No
1. a greater than 90 day storage unit . . .	☐	☐
☐ a. generated/accumulated during the reporting year		
☐ b. generated/accumulated prior to the reporting year		
2. an inactive disposal unit undergoing closure	☐	☐

B. Storage or disposal method	Handling Code	Amount	UOM	Density
1				lbs/gal ☐ sg ☐
2				lbs/gal ☐ sg ☐
3				lbs/gal ☐ sg ☐
4				lbs/gal ☐ sg ☐

Comments:

SEC 2C DENSITY of Hg = 113 lbs/GAL. QUANTITY WAS MOSTLY PACKAGING

13.59 g/cc × 8.3454

Extra Waste Codes:

MAIL THE COMPLETED FORM TO: Ohio EPA, DHWM, P.O. Box 1049, Columbus, OH 43216-1049	Ohio Environmental Protection Agency **RCRA SUBTITLE C SITE IDENTIFICATION**	For Ohio EPA Use Only

1. Reason for Submittal	**Reason for Submittal:** ☐ To provide initial notification (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities). ☒ To provide subsequent notification (to update site identification information). ☐ As a component of a First RCRA Hazardous Waste Part A Permit Application. ☐ As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment #_____) ☒ As a component of the Hazardous Waste Report for the year 2009		
2. Site EPA ID No.	**EPA ID Number:** OHD004465142		
3. Site Name	**Name:** Canton Drop Forge		
4. Site Location Information	**Street Address:** 4575 southway Stree S.W.		
	City, Town, or Village: Canton	**County:** Stark	
	State: Ohio	**Country:** USA	**Zip Code:** 44706
5. Site Land Type	**Site Land Type:** ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other		
6. North American Industry Class. System (NAICS) Code(s) for the Site	**A.** (Primary) 332111	**B.**	
	C.	**D.**	
7. Site Contact Person:	**First Name:** Keith	**MI:** J	**Last Name:** Houseknecht
	Title: Manager, Plant Engineering		
	Street or P.O. Box: Same		
	City, Town or Village:		
	State:	**Country:**	**Zip Code:**
	E-mail: khouseknecht@cantondropforge.com		
	Phone & Ext.: 330-477-4511 (188)		**Fax:** 330-477-2046
8. Legal Owner and Operator of the Site	**A. Name of Site's Legal Owner:** Jim O'Sullivan		**Date Became Owner (mm/dd/yyyy):** / / 10/01/1997
	Owner Type ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other		
	Street or P.O. Box: Same		
Additional Owners and/or Operators should be listed in the Comment Section or on another copy of this form page.	**City, Town, or Village:**		**Phone:**
	State:	**Country:**	**Zip Code:**
	B. Name of Site's Operator: Brad Ahbe		**Date Became Operator (mm/dd/yyyy):** / / 04/01/2004
	Operator Type: ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other		
	Street or P.O. Box: Same		
	City, Town, or Village:		**Phone:**
	State:	**Country:**	**Zip Code:**

9. Type of Regulated Waste Activity (Mark "X" in the appropriate boxes.)

A. **Hazardous Waste Activities**

1. **Generator of Hazardous Waste**
(choose only one of the following three categories or leave blank if not applicable)

[X] a. **Large Quantity Generator (LQG):**
Greater than 1,000 kg/mo (2,200 lbs.) of non-acute hazardous waste; or

[ ] b. **Small Quantity Generator (SQG)**
100 to 1,000 kg/mo (220-2,200 lbs.) of non-acute hazardous waste; or

[ ] c. **Conditionally Exempt Small Quantity Generator (CESQG):**
Less than 100 kg/mo of non-acute hazardous waste

In addition, indicate other generator activities (check all that apply)

[ ] d. Short-Term Generator (generate from a short-term or one-time event and not from on-going processes). If "Yes", provide an explanation in the Comments section.

[ ] e. United States Importer of Hazardous Waste

[ ] f. Mixed Waste (hazardous and radioactive) Generator

2. **Hazardous Waste Report Generator Status**
(choose one if a Reason for Submittal is the Hazardous Waste Report)

[X] a. **Large Quantity Generator (LQG):**
Greater than 1,000 kg/mo (2,200 lbs.) of non-acute hazardous waste was generated at the site in any one month. or

[ ] b. **Small Quantity Generator (SQG)**
In one or more months the site generated greater than 100kg (220 lbs) but in no month did it generate more than 1,000 kg/mo (220-2,200 lbs) of non-acute hazardous waste, or

[ ] c. **Conditionally Exempt Small Quantity Generator (CESQG):**
The site generated no more than 100 kg (220 lbs) of non-acute hazardous waste in any one month.

[ ] d. **Non-Generator**
The site did not generate any hazardous waste during the calendar year.

For Items 3 through 7, check all that apply:

3. **Transporter of Hazardous Waste**

[ ] a. Transporter

[ ] b. Transfer Facility (at your site)

[ ] 4. **Treater, Storer or Disposer of Hazardous Waste (at your site)** Note: A hazardous waste permit is required for this activity.

[ ] 5. **Recycler of Hazardous Waste (at your site)** Note: A hazardous waste permit may be required for this activity.

6. **Exempt Boiler and/or Industrial Furnace**

[ ] a. Small Quantity On-site Burner Exemption

[ ] b. Smelting, Melting and Refining Furnace Exemption

[ ] 7. **Underground Injection Control**

[ ] 8. **Receives Hazardous Waste from Off-site**

B. **Universal Waste Activities**

1. **Large Quantity Handler of Universal Waste (accumulate 5,000 kg or more). Indicate types of universal waste managed at your site. (check all boxes that apply):**

	Managed
a. Batteries	[ ]
b. Pesticides	[ ]
c. Mercury Containing Equipment	[ ]
d. Lamps	[ ]

[ ] 2. **Destination Facility for Universal Waste**
Note: A hazardous waste permit may be required for this activity.

C. **Used Oil Activities**

1. **Used Oil Transporter**
Indicate Type(s) of Activity(ies)

[ ] a. Transporter

[ ] b. Transfer Facility (at your site)

2. **Used Oil Processor and/or Re-refiner**
Indicate Type(s) of Activity(ies)

[ ] a. Processor

[ ] b. Re-refiner

[ ] 3. **Off-Specification Used Oil Burner**

4. **Used Oil Fuel Marketer -**
Indicate Type(s) of Activity(ies)

[ ] a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner

[ ] b. Marketer Who First Claims the Used Oil Meets the Specifications

10. **Waste Codes for Federally Regulated Hazardous Wastes.** Please list the codes for the federally regulated hazardous waste handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed.

D002	D009					

11. **Comments**

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

Signature of owner, operator, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm-dd-yyyy)
Keith J Houseknecht	Keith J Houseknecht, MGR. PE	10-22-2010

ATTACHMENT G

2007 Site Notification

MAIL THE COMPLETED FORM TO: Ohio EPA, DHWM, P.O. Box 1049, Columbus, OH 43216-1049	Ohio Environmental Protection Agency **RCRA SUBTITLE C SITE IDENTIFICATION**	For Ohio EPA Use Only

1. Reason for Submittal	**Reason for Submittal:** ☐ To provide initial notification (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities). ☒ To provide subsequent notification (to update site identification information). ☐ As a component of a First RCRA Hazardous Waste Part A Permit Application. ☐ As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment #_____) ☒ As a component of the Hazardous Waste Report for the year 2007.
2. Site EPA ID No.	**EPA ID Number:** OHD004465142
3. Site Name	**Name:** CANTON DROP FORGE INC.
4. Site Location Information	**Street Address:** 4575 SOUTHWAY STREET S.W **City, Town, or Village:** CANTON **State:** OH **County Name:** STARK **Zip Code:** 44706
5. Site Land Type	**Site Land Type:** ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other
6. North American Industry Class. System (NAICS) Code(s) for the Site	A. 332111 B. C. D.
7. Site Contact Person:	**First Name:** KEITH **MI:** J **Last Name:** HOUSEKNECHT **Phone Number:** 330-477-4511 **Phone Number Extension:** 188 **E-Mail Address:** KHOUSEKNECHT@CANTONDROPFORGE.COM **Fax Number:** 330-477-2046 **Fax Number Extension:** — **Street or P.O. Box:** 6902 **City, Town or Village:** CANTON **State:** OHIO **Country:** USA **Zip Code:** 44706
8. Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page.	A. **Name of Site's Legal Owner:** JIM O'SULLIVAN **Date Became Owner (mm/dd/yyyy):** 10/1997 **Owner Type:** ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other **Street or P.O. Box:** 6902 **City, Town, or Village:** CANTON **Owner Phone #:** 330-477-2046 **State:** OHIO **Country:** USA **Zip Code:** B. **Name of Site's Operator:** BRAD AHBE **Date Became Operator (mm/dd/yyyy):** 4/04 **Operator Type:** ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other **Street or P.O. Box:** 6902 **City, Town, or Village:** CANTON **Operator Phone #:** 330-477-4511 **State:** OHIO **Country:** USA **Zip Code:** 44706

9. Type of Regulated Waste Activity (Mark "X" in the appropriate boxes.)

A. **Hazardous Waste Activities**

1. **Generator of Hazardous Waste**
(choose only one of the following three categories)

☒ a. **Large Quantity Generator (LQG):**
Greater than 1,000 kg/mo (2,200 lbs.) of non-acute hazardous waste; or

☐ b. **Small Quantity Generator (SQG)**
100 to 1,000 kg/mo (220-2,200 lbs.) of non-acute hazardous waste; or

☐ c. **Conditionally Exempt Small Quantity Generator (CESQG):**
Less than 100 kg/mo of non-acute hazardous waste

In addition, indicate other generator activities (check all that apply)

☐ d. United States Importer of Hazardous Waste
☐ e. Mixed Waste (hazardous and radioactive) Generator

2. **Hazardous Waste Report Generator Status**
(choose one if a Reason for Submittal is the Hazardous Waste Report)

☒ a. **Large Quantity Generator (LQG):**
Greater than 1,000 kg/mo (2,200 lbs.) of non-acute hazardous waste was generated at the site in any one month. or

☐ b. **Small Quantity Generator (SQG)**
In one or more months the site generated greater than 100kg (220 lbs) but in no month did it generate more than 1,000 kg/mo (220-2,200 lbs) of non-acute hazardous waste, or

☐ c. **Conditionally Exempt Small Quantity Generator (CESQG):**
The site generated no more than 100 kg (220 lbs) of non-acute hazardous waste in any one month.

☐ d. **Non-Generator**
The site did not generate any hazardous waste during the calendar year.

For Items 3 through 7, check all that apply:

☐ 3. **Transporter of Hazardous Waste**

☐ 4. **Treater, Storer or Disposer of Hazardous Waste (at your site)** Note: A hazardous waste permit is required for this activity.

☐ 5. **Recycler of Hazardous Waste (at your site)** Note: A hazardous waste permit may be required for this activity.

6. **Exempt Boiler and/or Industrial Furnace**

☐ a. Small Quantity On-site Burner Exemption
☐ b. Smelting, Melting, Refining Furnace Exemption

☐ 7. **Underground Injection Control**

B. **Universal Waste Activities**

1. **Large Quantity Handler of Universal Waste (accumulate 5,000 kg or more). Indicate the types of universal waste managed at your site. Check all boxes that apply:**

	Managed
1. Batteries	☐
2. Pesticides	☐
3. Mercury containing equipment	☐
4. Lamps	☐

☐ 2. **Destination Facility for Universal Waste**
Note: A hazardous waste permit is required if you treat or dispose of universal wastes; a permit may be required if you recycle universal wastes.

C. **Used Oil Activities**

1. **Used Oil Transporter**
Indicate Type(s) of Activity(ies)
☐ a. Transporter
☐ b. Transfer Facility

2. **Used Oil Processor and/or Re-refiner**
Indicate Type(s) of Activity(ies)
☐ a. Processor
☐ b. Re-refiner

☐ 3. **Off-Specification Used Oil Burner**

4. **Used Oil Fuel Marketer -**
Indicate Type(s) of Activity(ies)
☐ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

10. Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed.

D002						

11. Comments

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

Signature of owner, operator, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm-dd-yyyy)
Keith J. Housekneche	KEITH J. HOUSEKNECHT MGR. PLANT ENGINEERING	11 AUGUST 2008

OhioEPA

State of Ohio Environmental Protection Agency

2007 **Annual Hazardous Waste Report**

ENTER GENERATOR ID NUMBER

OHD004465142

Form GM - *Generation and Management*

SEC. 1

A. Hazardous waste description (60 characters max.)

WASTE CORROSIVE LIQUID, ACIDIC, INORGANIC

B. Hazardous waste codes

D002

More... ☐

C. Source code: G02

Report the Management Method code ONLY if the Source code is G25.

Management Method code: H

D. Waste form code: W

SEC. 2

A. Quantity generated in the year prior to the reporting year: 0

B. Quantity generated in the reporting year: 4043

C. UOM: G Density: 8.6 lbs/gal ☒ sg ☐

D. Was this waste treated, disposed of, or recycled On-site ?

☐ Yes (continue to system 1)

☒ No (skip to SEC. 3)

On-site system 1 — RCRA-exempt unit? Yes ☐ No ☐

On-site mgmt method: H

Quantity treated, disposed or recycled:

On-site system 2 — RCRA-exempt unit? Yes ☐ No ☐

On-site mgmt method: H

Quantity treated, disposed or recycled:

SEC. 3

A. Was any of this waste shipped off-site in the reporting year?

☒ Yes (continue to box B)

☐ No (skip to SEC. 4)

	B. EPA ID of facility to which waste was shipped	C. Management Method	D. Total quantity shipped in the reporting year
Site 1	OHD980568992	H077	4043
Site 2		H	
Site 3		H	
Site 4		H	
Site 5		H	

EPA 9028 (Rev. 12-04)

CONTINUE TO SECTION 4 →

SEC. 4	On-site Waste Storage and Inactive Disposal Units

If the site has a storage permit or is undergoing a formal closure of storage or disposal units, and waste remained in the unit(s) as of December 31, complete Box A. Otherwise, skip Section 4.	A. As of December 31, did any of this waste remain on-site in:	Yes	No
	1. a greater than 90 day storage unit . . .	☐	☐
	☐ a. generated/accumulated during the reporting year		
	☐ b. generated/accumulated prior to the reporting year		
	2. an inactive disposal unit undergoing closure	☐	☐

B. Storage or disposal method	Handling Code	Amount	UOM	Density
1	☐☐☐	☐☐☐☐☐☐☐☐☐	☐	lbs/gal ☐ sg ☐
2	☐☐☐	☐☐☐☐☐☐☐☐☐	☐	lbs/gal ☐ sg ☐
3	☐☐☐	☐☐☐☐☐☐☐☐☐	☐	lbs/gal ☐ sg ☐
4	☐☐☐	☐☐☐☐☐☐☐☐☐	☐	lbs/gal ☐ sg ☐

Comments:

Extra Waste Codes:

OhioEPA

State of Ohio Environmental Protection Agency

2007 **Annual Hazardous Waste Report**

ENTER GENERATOR ID NUMBER

OHD004465142

Form OI - *Off-site Transporter and Receiving Facility Information*

1	A. EPA ID of transporter or receiving facility	B. Name of transporter or receiving facility (40 characters max.)
	OHD980568992	ENVIRITE OF OHIO, INC

C. Handler type (check all that apply)

- [x] Transporter
- [x] Receiving Facility

D. Address of receiving facility (address not required for transporters)

Street: 2050 CENTRAL AVE S.E.

City: CANTON State: OH ZIP Code: 44707-

2	A. EPA ID of transporter or receiving facility	B. Name of transporter or receiving facility (40 characters max.)

C. Handler type (check all that apply)

- [ ] Transporter
- [ ] Receiving Facility

D. Address of receiving facility (address not required for transporters)

Street:

City: State: ZIP Code: -

3	A. EPA ID of transporter or receiving facility	B. Name of transporter or receiving facility (40 characters max.)

C. Handler type (check all that apply)

- [ ] Transporter
- [ ] Receiving Facility

D. Address of receiving facility (address not required for transporters)

Street:

City: State: ZIP Code: -

4	A. EPA ID of transporter or receiving facility	B. Name of transporter or receiving facility (40 characters max.)

C. Handler type (check all that apply)

- [ ] Transporter
- [ ] Receiving Facility

D. Address of receiving facility (address not required for transporters)

Street:

City: State: ZIP Code: -

5	A. EPA ID of transporter or receiving facility	B. Name of transporter or receiving facility (40 characters max.)

C. Handler type (check all that apply)

- [ ] Transporter
- [ ] Receiving Facility

D. Address of receiving facility (address not required for transporters)

Street:

City: State: ZIP Code: -

OhioEPA

State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.state.oh.us

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

Ken Kwiser 214
Thomas Varlowski
330-456-6238 219
Hg?

August 6, 2008

JEROME BRESSANELLI
CANTON DROP FORGE INC
4575 SOUTHWAY ST SW BOX 6902
CANTON, OH 44706

Re: 2007 Hazardous Waste Annual Report Requirement
CANTON DROP FORGE INC, CANTON - OHD004465142

Dear JEROME BRESSANELLI:

My review of customer data from Ohio Treatment, Storage, and Disposal Facilities (TSDFs) has revealed that one or more shipments of hazardous waste were received from CANTON DROP FORGE INC during the 2007 calendar year. The total amount reported is approximately 17.73 tons as shown on the enclosed printout. This total indicates that CANTON DROP FORGE INC was a large quantity generator in 2007. Because I have not received a Hazardous Waste Annual Report for 2007, CANTON DROP FORGE INC may be in violation of Rule 3745-52-41 of the Ohio Administrative Code (OAC).

A large quantity generator is defined as a site which generates in any single month more than 1000 kg (2200 lbs) of non-acute hazardous waste or more than 1 kg (2.2 lb) of acutely hazardous waste. This includes wastes from one-time generation as well as wastes from ongoing production processes. It may take only one month of generating above the threshold quantity to subject a site to the Annual Report requirement. The generator is responsible for contacting Ohio EPA in order to obtain the reporting forms.

OAC Rule 3745-52-41 requires a generator who ships any hazardous waste off-site to prepare and submit to the Ohio EPA an **Annual Hazardous Waste Report** and to describe and certify efforts that were made to minimize hazardous wastes. These reports are due March 1 of each year and contain information about the activities of the previous calendar year. Only small quantity generators (between 220 and 2200 lb/mo of non-acutely hazardous wastes) and conditionally exempt small quantity generators (less than 220 lb/mo of non-acutely hazardous wastes) are exempt from the Annual Report requirement as described in OAC Rule 3745-52-44.

To abate the violation of OAC Rule 3745-52-41, CANTON DROP FORGE INC must complete and submit to Ohio EPA a 2007 Annual Hazardous Waste Report within 30 days of receipt of this letter. Failure to respond to this Notice of Violation may result in referral to the Compliance Assurance Section for consideration of escalated enforcement. You may access the reporting forms and instructions on our website at http://www.epa.state.oh.us/dhwm/ann_report.html.

CANTON DROP FORGE INC should have on file the manifest records necessary for completion of the reports. OAC Rule 3745-52-40 requires generators to keep a signed copy of each manifest for a period of at least three years from the date the waste was accepted by the

initial transporter. Receiving facilities and transporters are under a similar requirement. If you need copies of the original manifest(s), contact them for assistance.

If CANTON DROP FORGE INC was not a large quantity generator in 2007, documentation must be submitted to this office within 30 days of receipt of this letter. This documentation must show that CANTON DROP FORGE INC did not generate more than the threshold quantity of hazardous waste in any month during 2007. If you believe that the information supplied by Ohio TSDFs is in error, please call me to discuss the discrepancy.

A letter that acknowledges receipt of the report will be sent to you after it is processed. I can answer questions concerning the Annual Report at (614) 644-2891. Your prompt attention to this matter is appreciated.

Sincerely,

Mary Ann Silagy

Mary Ann Silagy
Environmental Specialist 2
Regulatory and Information Services
Division of Hazardous Waste Management
maryann.silagy@epa.state.oh.us

enclosure

cc: Central File
DHWM, NEDO

NOTICE:
Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.

Annual Reports - NOV Candidate Report for 2007

Generator Facility

Generator US EPA ID: OHD004465142
Generator Name: Canton Drop Forging and Mfg Co STU 1
Address: 4575 Southway St SW
Canton, OH 44706-
Total Tons Shipped: 17.73

Receiving Facility

US EPA ID: OHD980568992
Name: Envirite of Ohio Inc
Customer Name: CANTON DROP FORGE
Customer Address: 4575 Southway Street SW
CANTON, OH 44706-

Waste Description: HCL SOLUTION **Page:** 292 **Subpage:** 1
System Type: H111 **Form:** W501 **Quantity:** 17.73 T **Density:** 0 S.G.
D002

ATTACHMENT H

Blast Media MSDS

MATERIAL SAFETY DATA SHEET

ERVIN

ERVIN INDUSTRIES, INC. 3893 RESEARCH PARK DRIVE ANN ARBOR, MI 48108-2217	TELEPHONE: (734) 769-4600 FAX: (734) 663-0136

Revision Date: 12/9/09	Replaces Date: 5/28/2008	Revision Level: S
PREPARED BY: Dennis Scharer	Ervin Industries	

SECTION I PRODUCT IDENTIFICATION

Product Name		Chemical Family
AMASTEEL SHOT	AMABRASIVE	FERROUS
AMASTEEL GRIT	(SHOT / GRIT MIX)	

SECTION II COMPOSITION / INGREDIENTS

Chemical Name	CAS Registry No	% Weight	ACGIH - TLV (mg/m^3)	OSHA - PEL (mg/m^3)
Iron - Fe	7439-89-6	>96		
Oxide fume as Fe			5	10
Carbon - C	7440-44-0	<1.2	none estab.	none estab.
Manganese - Mn	7439-96-5	<1.3		
Elemental, Inorganic Compounds as Mn			0.2	5 (ceiling)
Fume as Mn			none estab.	5 (ceiling)
Silicon - Si	7440-21-3	<1.2		
as total dust			10	15
Respirable fraction			none estab.	5
Chromium - Cr	7440-47-3	<0.25		
Elemental, Inorganic Compounds as Cr metal			0.5	1
Cr II compounds - as Cr			none estab.	0.5
Cr III compounds - as Cr			0.5	0.5
Cr VI compounds - water soluble			0.05	5 ug
Cr VI compounds - insoluble			0.01	5 ug
Chromic Acid and Chromates as CrO_3			none estab.	0.1 (ceiling)
Cr VI (hexavalent chromium) in product as shipped		**Not detected**	0.05 & 0.01	5 ug /2.5 action
Copper – Cu	7440-50-8	<0.25		
Fume			0.2	0.1
Dust & mists			1	1
Nickel - Ni	7440-02-0	<0.20		
Elemental metal			1.5	
Insoluble as Ni			0.1	1
Soluble compounds as Ni			0.2	1

SECTION III PHYSICAL DATA

Cast steel shot and grit are non-hazardous as received. Fine metallic dust is generated as the abrasive breaks down from impact and wear during normal use. Since the ferrous content is >96%, dust or fumes will consist mainly of iron or iron oxide. In addition, the fine steel dust created can be a mild explosion hazard (see section V).

Boiling Point - 2850-3150 Degrees C	Melting Point - 1371-1483 Degrees C
Specific Gravity (at 60 Degrees F) >7.6	Vapor Pressure - Not Applicable
% Volatile by Volume - Not Applicable	pH - Not Applicable
Appearance and Odor - Spherical - no odor	Percent Solid by Weight - 100%

SECTION IV REACTIVITY DATA

Stability – Stable Hazardous decomposition products – None Hazardous Polymerization - will not occur

Shot will break down into progressively smaller particles and dust during normal use.

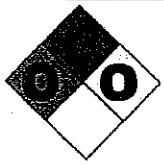
MATERIAL SAFETY DATA SHEET

ERVIN

SECTION V FIRE AND EXPLOSION HAZARD DATA

Flash Point - Not Applicable	Auto Ignition Temperature (solid iron exposed to Oxygen) -930 degree C
Flammability Limits - Not Applicable	Cast steel shot will not burn or explode

A mild fire or explosion hazard situation may be created from fine metal dust. Fire Extinguishing method for dust created due to use - use Class D extinguishing agents or dry sand to exclude air. Do not use water or other liquids, or foam.



NFPA Hazard Rating: 0 = Insignificant 1 = Slight 2 = Moderate 3 = High 4 = Extreme

Health (blue) = 0 Flammability (red) = 0 Reactivity (yellow) = 0 Special (colorless)

SECTION VI HEALTH HAZARD DATA

Emergency and First Aid Procedure - If inhaled, move out of area into fresh air. Flush eyes with running water, have any remaining particles removed from eyes by a qualified medical person; call 911 for immediate medical assistance.

The end user should have an industrial hygiene evaluation to determine the proper personal protective equipment for each application or blasting operation. Threshold Limit Values - Permissible Exposure Limits - see Section II

Primary Routes of entry - inhalation of dust or dust particles in eyes. Target Organs - Lung for chromium and lung & nasal for Nickel. Metallic Nickel is reasonably anticipated to be a human carcinogen.

Over exposure to dust and fumes may cause mouth, eye, and nose irritation. Prolonged overexposure to manganese dust or fume affects the central nervous system. Prolonged overexposure to iron oxide fume can cause siderosis, or "iron pigmentation" of the lung. It can be seen on a chest x-ray but causes little or no disability.

Fumes generated by welding or flame cutting a surface containing new or used abrasive or the dust created by use of the abrasive may convert a small portion of chromium to hexavalent chromium. IARC reports welding fumes are possibly carcinogenic to humans.

SECTION VII PERSONAL PROTECTION INFORMATION

Ventilation - General ventilation and local exhaust should be provided to keep the dust levels below the limits shown in Section II.

Respiratory protection – If an industrial hygiene evaluation shows dust exceeds OSHA PEL's indicated in Section II, a NIOSH approved respirator with appropriate filters should be worn as determined by the end user.

Eye protection - Approved safety glasses w/side shields should always be worn. Other protective equipment determined by the end user.

SECTION VIII SPILL / LEAK PROCEDURES AND WASTE DETERMINATION

Shot spilled or leaked onto floors can create hazardous walking conditions. When cleaning up quantities of dust; if exceeding OSHA permissible exposure limits, an approved respirator with appropriate filters should be used.

Dust from blasting or peening operations always contain contaminants. The dust must be tested to determine if it is hazardous or non-hazardous waste. After such determination, the dust must be disposed of according to appropriate local, State or Federal regulations.

SECTION IX SPECIAL PRECAUTIONS

Precautions to be taken in handling and storing - Keep dry to reduce rusting. **Observe maximum floor loading limitations.**

SECTION X TRANSPORTATION

DOT Classification - Not a regulated material Proper Shipping Name - N/A DOT ID # - Not regulated

SECTION XI REGULATORY

a) CERCLA Hazardous Substance	_____ **yes**	__X__ **no**
b) SARA, Title III, Extremely Hazardous Substance	_____ **yes**	__X__ **no**
c) Toxic Chemical Release Report	__X__ **yes**	_____ **no**

Nickel & Manganese are subject to requirements of Section 313 of the Community Right-to-know Act of 1986 & 40CFR Part 372.

The information presented here has been compiled from sources considered to be reliable and accurate to the best of our knowledge and belief, but is not guaranteed to be so.

Safety Data Sheet for Chemical Products

PRODUCT: BROWN FUSED ALUMINUM OXIDE

1. Identification of the substance and the company

1.1. Identification of the substance or preparation

Product Name: Brown Fused Aluminum Oxide – All grades

Molecular formula: Al_2O_3 (α – Alumina)

CAS: 1344-28-1 / EINECS: 215-691-6

Registration Number: 01-2119529248-35-0141

1.2. Use of the substance or preparation - Abrasives, Ceramics, Flooring, Surface Treatment and Refractory.

1.3. Company Identification

U.S. Electrofused Minerals, Inc.
600 Steel Street
Aliquippa, Pa. 15202
Homepage: www.usminerals.com

Emergency Telephone

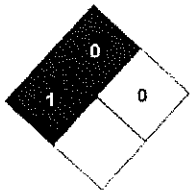
U.S.Electrofused Minerals
Telephone:724-857-9880

2. Hazard identification

2.1. Classification of the substance / preparation

Aluminum Oxide is not classified as dangerous substance or preparation according to directive 67/548/CEE or directive 1999/45/CE.

HMIS



2.2. Information concerning particular hazards for human and environment:

Does not pose any health hazard under normal conditions of use and as delivered.

High dust concentration may cause mechanical irritation of the eyes, skin and respiratory tract.

2.3. Other adverse effects: Avoid dust generation.

3. Composition/Information on ingredients

Chemical Name	CAS	EINECS	% by Weight	Classification	R-phrase
Aluminum Oxide[1]	1344-28-1	215-691-6	≥ 92.0	—	—
Impurities	SiO2+Fe2O3+Na2O+CaO+MgO+TiO2		≤ 8.0	----	----
[1]Non fibrous					

4. First aid measures

4.1. General information:

First aid personnel: pay attention to self-protection!

- **After Inhalation:** In case of dust inhalation remove to ventilated area and keep calm. In case of ongoing discomfort consult a physician.
- **After skin contact:** In case of large exposures wash with soap and water.
- **After Eye contact:** If particles come into contact with eyes treatment for mechanical irritation or injury may be required; flush thoroughly with water, in case of ongoing discomfort consult a physician.
- **After swallowing:** Wash mouth with water.

4.2. Note to physician: None.

5. Fire fighting measures

Not flammable.

5.1. Suitable extinguishing agents: Use extinguishing agents appropriate for surrounding materials.

5.2. For safety reasons unsuitable extinguishing agents: None .

5.3. Special hazards caused by the substance, its products of combustion or resulting gases: None.

5.4. Protective equipment: Fire fighters should wear approved personal protective equipment for the surrounding fired material.

6. Accidental release measure

6.1. Person-related Safety Precautions: See protection measures listed in section 8.

6.2. Environmental Precautions: Avoid dispersal of spilled material and runoff. Avoid creating dusty conditions and prevent wind dispersal. Collect material for recycling if possible.

6.3. Measure for cleaning: Use vacuum cleaner if possible.

6.4. Additional hints: See section 13.

7. Handling and storage

7.1. Handling: Ensure good ventilation / local exhaust at the workplace in the case of operations generating dust. Avoid creating dusty conditions.

Avoid inhalation and skin and eye contact.

Wear appropriate personal protective equipment. Do not add wet alumina to electrolysis cells.

7.2. Storage:

Requirements to be met by storerooms and receptacles: Store in dry area.

Additional hints: None.

8. Exposure controls/personal protection

8.1. Exposure limits:

- Occupational exposure limits (air): generally same as for nuisance dust.
- Germany

10*/3** mg/m3 (*inhalable dust; ** respirable dust)

- Great Britain

10*/4** mg/m3 (*inhalable dust; ** respirable dust)

- United States

OSHA 15 mg/m3 (total dust); 5 mg/m3 TWA (respirable fraction)

- Some additional EU countries: 10 mg/m^3 (include national OEL if this exists)

8.2. Exposure controls:

Ensure good ventilation / local exhaust at the workplace in the case of operations generating dust. Avoid work practises which generate dust. Avoid inhalation and particles entering the eyes.

8.3. Personal Protective Equipment:

Respiratory equipment: not required under recommended conditions of use. In case dust is generated, use personal protective equipment, dust filter P2 or if fine particles P3.

Use protective goggles and gloves when handling the substance and appropriate work clothes.

8.4. Environmental exposure control:

Avoid creating dusty conditions and prevent wind dispersal and dust emissions.

9. Physical and chemical properties

9.1. General Information

Appearance	Powder	Colour	Brown and Gray
Physical State	Solid	Odour	Odourless
Melting Point/ Melting range	Approx. 2.040 °C	Density at 20°C	~3.97 g/cm^3
Boiling Point/ Boiling range	Not relevant	Bulk Density	Not applicable
Flashpoint	Not relevant	Solubility	Not applicable
Flammability	Not relevant	Solubility in water	Insoluble
Ignition temperature	Not applicable	Partition coefficient: n-octanol/ water	Not applicable
Auto flammability	Not relevant	Viscosity	Not applicable
Oxidizing properties	Not applicable	pH Value	Not relevant
Vapour pressure	Not applicable	Evaporation rate	Not applicable
Relative density	Not applicable	Explosive properties	Not relevant

9.2. Important information on health and safety and environmental protection: Safety related basic data, methods, and comments.

10. Stability and reactivity

10.1. General Information: The material is stable under normal conditions of use, storage, and transport.

10.2. Conditions to be avoided: Avoid dust generation.

10.3. Materials to be avoided: Not applicable.

10.4. Hazardous decomposition products: None.

11. Toxicological information

11.1. Toxicokinetics, metabolism and distribution:

Oral uptake < 0.1%, nearly insoluble in lung fluids, most absorbed aluminium oxide is rapidly excreted through urine, main deposit in body is in bone structure.

11.2. Acute effects (acute toxicity, irritation and corrosivity): No acute effects.

11.2.1. Acute toxicity:

LD50 (oral): > 5000mg/kg bwt (rats).

LD50 (dermal): No effect.

LD50 (inhalation): > 2,3 mg/l (rats).

11.2.2. Specific symptoms in animal tests:

After swallowing: None.

After skin contact: None.

After inhalation: None.

11.2.3. Irritation and Corrosive effects:

Irritant effects on skin: No effects.

Irritant effect on eyes: No effects apart from mechanical irritation.

11.3. Sensitisation:

After skin contact: None

After inhalation: None

11.4. Toxicity after repeated intake (sub acute, sub chronic, chronic):

Sub acute oral Toxicity: None, calculated DNEL 6,2 mg/kg bwt/day.

Sub acute inhalation Toxicity: None, see occupational exposure limits, calculated DNEL: 15,6 mg/m^3 respirable.

11.5. CMR-effects (carcinogenic, mutagenic and reproductive effects)

Carcinogenicity: None.

Mutagenicity: None.

Reproductive toxicity: None.

Assessment of CMR properties: Not classified for CMR.

Product components not listed under IARC/NTP/ACGIH (ingredient carcinogenicity).

11.6. Practical experience:

Observations relevant for classification: None.

Other observations: none.

12. Ecological Information

12.1. Ecotoxicity:

Product/Ingredient name	Test	Result	Species	Exposure
Aluminium oxide	Fish - OECD TG 203	>100 mg/l	Salmo trutta	pH 8
Aluminium oxide	Daphnia - OECD TG 202	>100mg/l	Daphnia Magna	pH 8
Aluminium oxide	Algae - OECD TG 201	>100mg/l	Selenastrum Capricornutum	pH 8

12.2. Mobility:

Not mobile under normal environmental conditions may be leached from the ground at low pH (< 5.5) or high pH (> 8.5).

12.3. Persistence and degradability:

12.3.1. Persistence: Not relevant for metals.

12.3.2. Biological degradability: Not degradable.

12.4. Bioaccumulative potential: Not bio accumulative

12.5. Long term ecotoxicity: Not classified for ecotoxicity.

12.6. Results of PBT assessment: Not relevant for metals.

12.7. Other adverse effects: No

12.8. Final assessment: No acute or chronic classification is appropriate for Al metal massive based on non toxic results below the Ecotoxicity Reference Value (ERV) of tests with aluminium metal, oxide and hydroxide at loadings of 100 mg/L at pH 8-8.5 (maximum solubility of Al expected).
All aluminium in soil or the aquatic environment comes from natural sources. Local sources have an insignificant contribution and impact on environment.

13. Disposal Considerantion

13.1. Waste from Residues: Not classified as hazardous waste, disposal should be in accordance with local, state and national legislation.
13.2. Packing: Packaging has to be emptied entirely, recycling of used packaging is recommended in accordance with local, state and national legislation.
13.3. End Use: Recycle all aluminum oxide articles and components where possible. Dispose in accordance with local, state and national legislation.

14. Transport information

14.1. Land transport
GGVS/ADR: Not classified as dangerous for transportation.
GGVE/RID: Not classified as dangerous for transportation.
14.2. Inland waterways - GGVBisch/ADNR: Not classified as dangerous for transportation.
14.3. Maritime transport - GGVSee/IMDG: Not classified as dangerous for transportation.
14.4. Airtransport - ICAO-TI/I AT: Not classified as dangerous for transportation.

15. Regulatory information

U.S. Federal Regulations:
TSCA Status: Listed on the TSCA Inventory.
CERCLA Reportable Quantity: None

SARA Title III:
Section 302 EHS: None
Section 311/312 Hazard Categories: Reportable
Section 313 Toxic Categories: None
California Proposition 65 Components: None

16. Further information

In dealing with chemicals the national laws and regulation must be observed and applied.
This information is based on our present knowledge. However, this shall not constitute a guarantee for any specific product features and shall not establish a legally valid contractual relationship.
Recommended limitations of use by manufacturer.
For industrial use and as component in consumer products.

Version history:
Original: 01/12/2011
Revision: -

Doc-ID: BFAOMSDS-USA

Abbreviations:
ACGIH: American Conference of Governmental Industrial Hygienists
OSHA: Occupational Safety and Health Administration (US)
ADR: Accord européen sur le transport des marchandises dangereuses par Route (European Agreement concerning the International Carriage of Dangerous Goods by Road)
RID: Règlement international concernant le transport des marchandises dangereuses par chemin de fer (Regulations concerning the International Transport of Dangerous Goods by Rail)
IMDG: International Maritime Code for Dangerous Goods
IATA: International Air Transport Association
IATA-DGR: Dangerous Goods Regulations by the "International Air Transport Association" (IATA)
ICAO: International Civil Aviation Organization
ICAO-TI: Technical Instructions by the "International Civil Aviation Organization" (ICAO)
GHS: Globally Harmonized System of Classification and Labelling of Chemicals
EINECS: European Inventory of Existing Commercial Chemical Substances
CAS: Chemical Abstracts Service (division of the American Chemical Society)
Bwt: bodyweight
PNEC: Potential No Effect Concentration
DNEL: Derived No Effect Level
DOC: Dissolved Organic Compounds

Disclaimer

The information provided in this Safety Data Sheet is believed to be the best of our knowledge at the date of this publication. This information is given in good faith and it can be used as guidance for safe, handling, use, processing, storage, transportation, disposal and release and is not to be considered a warranty or quality specification. The information is related to the specific material designated and may not be valid for such material used in combination with any other materials or in any process, unless specified in the text.

ATTACHMENT I

Oil Analysis

CRYSTAL LABORATORIES

1201 Camden Ave, SW * Canton, Ohio 44706
Phone No: 330-454-4222

Laboratory No. **090204024** **Customer:** **Canton Drop Forge**
4575 Southway Street
Date Received: **02/04/09** **Canton, OH 44706**

Identification: **Dubro 700**
Sample Matrix: **Solid**

Analysis	Method	Results	Detection Limits	Date of Analysis
Sulfur	(IC)	0.36%	0.01%	02/13/09
Graphite	SW 6010	13.5%	0.01%	02/13/09
Pour Point	ASTM D97	0°C		02/13/09
Viscosity	ASTM D445	105mm2/s		02/13/09
Flashpoint	ASTM D92	>350°F	73°F	02/13/09
Percent Solids	Gravimetric	25.3%	0.01%	02/13/09
Specific Gravity	ASTM 1298	0.9250		02/13/09
Percent Chlorine	ASTM D4929	0.58%	0.01%	02/13/09
Mercury	SW846/7471	<0.002 mg/kg	0.002 mg/kg	02/13/09
Percent Volatiles	ASTM D3172	77.9%	0.01%	02/13/09

Approved By: _____

CRYSTAL LABORATORIES

1201 Camden Ave, SW * Canton, Ohio 44706
Phone No: 330-454-4222

Laboratory No. **090204025** **Customer:** **Canton Drop Forge**
4575 Southway Street
Date Received: **02/04/09** **Canton, OH 44706**

Identification: **Dubro 500**
Sample Matrix: **Solid**

Analysis	Method	Results	Detection Limits	Date of Analysis
Sulfur	(IC)	0.29%	0.01%	02/13/09
Graphite	SW 6010	13.8%	0.01%	02/13/09
Pour Point	ASTM D97	0°C		02/13/09
Viscosity	ASTM D445	102mm2/s		02/13/09
Flashpoint	ASTM D92	>350°F	73°F	02/13/09
Percent Solids	Gravimetric	25.4%	0.01%	02/13/09
Specific Gravity	ASTM 1298	0.9280		02/13/09
Percent Chlorine	ASTM D4929	0.52%	0.01%	02/13/09
Mercury	SW846/7471	<0.002 mg/kg	0.002 mg/kg	02/13/09
Percent Volatiles	ASTM D3172	78.2%	0.01%	02/13/09

Approved By: _____

CRYSTAL LABORATORIES

1201 Camden Ave, SW * Canton, Ohio 44706
Phone No: 330-454-4222

Laboratory No. **090204026** **Customer:** **Canton Drop Forge**
4575 Southway Street
Date Received: **02/04/09** **Canton, OH 44706**

Identification: **Dubro 550**
Sample Matrix: **Solid**

Analysis	Method	Results	Detection Limits	Date of Analysis
Sulfur	(IC)	0.30%	0.01%	02/13/09
Graphite	SW 6010	13.9%	0.01%	02/13/09
Pour Point	ASTM D97	0°C		02/13/09
Viscosity	ASTM D445	95mm2/s		02/13/09
Flashpoint	ASTM D92	>350°F	73°F	02/13/09
Percent Solids	Gravimetric	20.5%	0.01%	02/13/09
Specific Gravity	ASTM 1298	0.9100		02/13/09
Percent Chlorine	ASTM D4929	0.53%	0.01%	02/13/09
Mercury	SW846/7471	<0.002 mg/kg	0.002 mg/kg	02/13/09
Percent Volatiles	ASTM D3172	78.4%	0.01%	02/13/09

Approved By: _____

ATTACHMENT J

Used Oil Shipments

Dubro Oil Corporation
2400 Mulberry Street
Cleveland, Ohio 44113
Phone: (216) 696-2646

WASTE PROFILE

PROFILE #

A. GENERATOR INFORMATION

Generator Name: CANTON DROP FORGE

Address: 4575 SOUTHWAY ST S.W.

City: CANTON State: OHIO Zip: 44706

Technical Contact Name: K HOUSERNECHT Phone: 330 477 4571

email: KHOUSERNECHT@CANTONDROPFORGE.COM Fax: 330 477-2046

USEPA ID # OHD 004465142 ☐ CESQG ☐ SQG ☒ LQG

B. BILLING INFORMATION

☒ SAME AS GENERATOR

Customer Name:

Address:

City: State: Zip:

Contact: Phone:

email: Fax:

C. SHIPPING INFORMATION

Proper DOT Shipping Name: WASTE OIL

Shipping Volume: 450 ☒ gallons ☐ drums ☐ pounds ☐ other

Container Type: TOTE Size: 450 GALLON

Frequency: ☐ Day ☐ Week ☒ Month ☐ Qtr ☐ Year ☐ Once

D. MATERIAL DESCRIPTION

Common Name: WASTE OIL

Specific Process Generating Material: FORGING

E. CHEMICAL COMPOSITION

COMPONENT	RANGE				PERCENT	PPM
OIL	MIN	85	MAX	95	☒	☐
WATER	MIN	1	MAX	4	☒	☐
DIRT	MIN	1	MAX	1	☒	☐
	MIN		MAX		☐	☐

Analytical Attached: ☐ Yes ☒ No

F. PHYSICAL PROPERTIES

Liquid: 99 %

Solid: 1 % Phases: ☐ Single ☐ Double ☐ Multi

Sludge: ____ %

Color: BLACK

Odor: ____

Physical State at 70°F: ☐ Solid ☒ Liquid ☐ Sludge ☐ Dust

pH: ☐ <2 ☐ 2.1 - 4.9 ☒ 5-10 ☐ 10.1-12.4 ☐ >12.5

Flashpoint: ☐ <100°F ☐ 101-139°F ☐ 140-199°F ☒ >200°F

G. REGULATORY INFORMATION

Is this an EPA RCRA listed hazardous waste (F, K, P, U)?	☐ Y	☐ N		
Is this an EPA RCRA characteristic waste (D001-D043)?	☐ Y	☐ N		
Is this material produced from a renewable source?	☐ Y	☐ N		
Is this a PCB waste regulated by TSCA? (PCB ≥ 50 PPM)	☐ Y	☒ N		
Does this material contain any detectable PCBs? (2 PPM or more)	☐ Y	☒ N		
Does this material contain petroleum products other than used oil?	☐ Y	☒ N		
Does this waste stream contain used oil?	☒ Y	☐ N		
Is this used oil mixed with either listed or characteristic hazardous waste generated by a CESQG?	☐ Y	☒ N	☐ NA	
If the used oil is mixed with either listed or characteristic hazardous waste, dies the resulting mixture result in exhibiting any characteristic of hazardous waste?	☐ Y	☒ N	☐ NA	
Does this used oil stream contain >1000 PPM of halogens? If no, attach rebuttable presumption (i.e. MSDS, purchase orders, invoice, shipping ticket, hazardous waste generator status, detailed explanation of process generating waste)	☐ Y	☐ N	☐ NA	
Analytical data or rebuttable presumption attached?	☐ Y	☒ N		

H. HAZARDOUS CHARACTERISTICS

Contains: ☐ Asbestos __ % ☐ Herbicides/Pesticides __ % ☐ Radioactive ☐ Biological/Infectious

☐ Reactive ☐ Explosive ☐ Pyrophoric ☐ Fuming ☐ Shock ☐ Air Reactive ☐ Water Reactive

I hereby certify that the information contained in this profile form is accurate and complete. There have been no deliberate omissions or falsification of information pertaining to the composition, properties, and hazards associated with this waste, and all known or suspected hazards have been disclosed.

Generator Signature: X [signature] Title (Print): X Plc Pro Eng

Name (Print): X Ro Houseknecht Date: X 11/15/10

Dubro Oil Corporation
2400 Mulberry Street
Cleveland, Ohio 44113
Phone: (216) 696-2646

WASTE PROFILE

PROFILE #

A. GENERATOR INFORMATION

Generator Name: CANTON DROP FORGE

Address: 4575 SOUTHWAY ST S.W.

City: CANTON State: OHIO Zip: 44706

Technical Contact Name: K HOUSENECHT Phone: 330 477 4511

email: KHOUSENECHT@CANTONDROPFORGE.COM Fax: 330 477 2046

USEPA ID # OHD 004465142 ☐ CESQG ☐ SQG ☑ LQG

B. BILLING INFORMATION

☑ SAME AS GENERATOR

Customer Name:

Address:

City: State: Zip:

Contact: Phone:

email: Fax:

C. SHIPPING INFORMATION

Proper DOT Shipping Name: WASTE OIL

Shipping Volume: ☐ gallons ☐ drums ☐ pounds ☐ other

Container Type: TOTE Size: 450 GAL

Frequency: ☐ Day ☐ Week ☒ Month ☐ Qtr ☐ Year ☐ Once

D. MATERIAL DESCRIPTION

Common Name: WASTE OIL

Specific Process Generating Material: HYDRAULIC OIL FOR FORGING TRIM PRESS & MANIPULATORS

E. CHEMICAL COMPOSITION

COMPONENT	RANGE				PERCENT	PPM
OIL	MIN	98.0	MAX	99.5	☐	☐
WATER	MIN	1.5	MAX	0.0	☐	☐
DIRT	MIN	.5	MAX	.5	☐	☐
	MIN		MAX		☐	☐

Analytical Attached: ☐ Yes ☑ No

F. PHYSICAL PROPERTIES

Liquid: 99.5 %

Solid: .5 % Phases: ☐ Single ☐ Double ☐ Multi

Sludge: — %

Color: BLACK

Odor: NONE

Physical State at 70°F: ☐ Solid ☒ Liquid ☐ Sludge ☐ Dust

pH: ☐ <2 ☐ 2.1 - 4.9 ☒ 5-10 ☐ 10.1-12.4 ☐ >12.5

Flashpoint: ☐ <100°F ☐ 101-139°F ☐ 140-199°F ☒ >200°F

G. REGULATORY INFORMATION

Is this an EPA RCRA listed hazardous waste (F, K, P, U)?	☐	Y	☐	N		
Is this an EPA RCRA characteristic waste (D001-D043)?	☐	Y	☐	N		
Is this material produced from a renewable source?	☐	Y	☐	N		
Is this a PCB waste regulated by TSCA? (PCB ≥ 50 PPM)	☐	Y	☑	N		
Does this material contain any detectable PCBs? (2 PPM or more)	☐	Y	☑	N		
Does this material contain petroleum products other than used oil?	☐	Y	☑	N		
Does this waste stream contain used oil?	☑	Y	☐	N		
Is this used oil mixed with either listed or characteristic hazardous waste generated by a CESQG?	☐	Y	☑	N	☐	NA
If the used oil is mixed with either listed or characteristic hazardous waste, dies the resulting mixture result in exhibiting any characteristic of hazardous waste?	☐	Y	☑	N	☐	NA
Does this used oil stream contain >1000 PPM of halogens? If no, attach rebuttable presumption (i.e. MSDS, purchase orders, invoice, shipping ticket, hazardous waste generator status, detailed explanation of process generating waste)	☐	Y	☐	N	☐	NA
Analytical data or rebuttable presumption attached?	☐	Y	☐	N		

H. HAZARDOUS CHARACTERISTICS

Contains: ☐ Asbestos __ % ☐ Herbicides/Pesticides __ % ☐ Radioactive ☐ Biological/Infectious

☐ Reactive ☐ Explosive ☐ Pyrophoric ☐ Fuming ☐ Shock ☐ Air Reactive ☐ Water Reactive

I hereby certify that the information contained in this profile form is accurate and complete. There have been no deliberate omissions or falsification of information pertaining to the composition, properties, and hazards associated with this waste, and all known or suspected hazards have been disclosed.

Generator Signature: X [signature] Title (Print): X MGR PLT ENG

Name (Print): X KEVIN HOUSEKNECHT Date: X 11/15/10

SHIPPING NOTICE

CANTON DROP FORGE
4575 SOUTHWAY ST., S.W. • P.O. BOX 6902
CANTON, OHIO 44706

HIGH PERFORMANCE CLOSED DIE FORGINGS

PH. 330 / 477-4511
FAX 330 / 477-2046

No. 08981

DATE SHIPPED 9/21/10

SOLD TO
DUBRO OIL
2400 MULBERRY ST
CLEVELAND OH 44113

SHIP TO
SAME

CUSTOMER ORDER NO.	OUR JOB	BILL OF LADING NO.	COLLECT / PREPAID
CDF PO #10-0098			
PART NAME	DIE NO.	SHIPPED VIA:	
PART NUMBER	CHANGE	VENDOR TRK	

PIECES	SERIAL NUMBER	MILL	HEAT NUMBER	HEAT CODE	LOT	WEIGHT UNIT	WEIGHT TOTAL
	[redacted]						
500	GALLONS NON HAZARDOUS HYRAULIC OIL						
600	GALLONS NON HAZARDOUS RECYCLE OIL						

Bunk [illegible]
9/21/10

TOTAL	ITEM NUMBER	REMARKS:
TYPE STEEL:		NO. OF @ LBS. EA.
		GROSS WT.

SHIP 006 REV 1

SHIPPING NOTICE

CANTON DROP FORGE

HIGH PERFORMANCE CLOSED DIE FORGINGS

4575 SOUTHWAY ST., S.W. • P.O. BOX 6902
CANTON, OHIO 44706

PH. 330 / 477-4511
FAX 330 / 477-2046

No. 08991

DATE SHIPPED 10/12/10

SOLD TO
DUBRO OIL
2400 MULBERRY ST
CLEVELAND OH 44113

SHIP TO
SAME

CUSTOMER ORDER NO.	OUR JOB	BILL OF LADING NO.	COLLECT / PREPAID
CDF PO #10-0098			
PART NAME	DIE NO.	SHIPPED VIA:	
PART NUMBER	CHANGE	VENDOR TRK	

PIECES	SERIAL NUMBER	MILL	HEAT NUMBER	HEAT CODE	LOT	WEIGHT UNIT	WEIGHT TOTAL
3	GALLONS NON HAZARDOUS HYDRAULIC OIL					300	900 GAL
2	GALLONS NON HAZARDOUS RECYCLE OIL					300	600 GAL

TOTAL 5

ITEM NUMBER

TYPE STEEL:

REMARKS:

NO. OF @ LBS. EA.

GROSS WT.

Ray C. Mitchell

SHIP 006 REV 1

ADER must be legibly filled in, in ink, in indelible Pencil, or in Carbon, and retained by the Agent.

y determined rates or contracts that have been agreed upon in writing per, if applicable, otherwise to the rates, classifications and rules that ne carrier and are available to the shipper, on request;

Carrier's Pro No.
Shipper's Bill of Lading No.
Consignee's Reference/PO No.
Carrier's Code (SCAC)

10-11-10 Carrier

Cleveland, Ohio from DUBRO OIL CORP.

described below in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated below, which said carrier (the word carrier being understood this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route destination, it is mutually agreed as to each carrier of all or any of, said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be ied hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in Uniform Freight Classification in effect on the date hereof, if this is a rail or a rail-water shipment, or (2) in the cable motor carrier classification or tariff if this is a motor carrier shipment.

Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said ns and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

onsigned to CANTON Drop Forge (Mail or street address of consignee—For purposes of notification only.)

estination CANTON State Ohio Zip Code 44206 County

elivery Address ★ 4575 South way Street SW.
(★ To be filled in only when shipper desires and governing tariffs provide for delivery thereat.)

Route No.

Delivering Carrier DuBro Car or Vehicle Initials

No. Packages		*Weight (Sub. to Car.)	Class or Rate	Check Column
1 Totes	700 Forging LuB	2400		
Totes	500R Forging LuB	2400		
Totes	1 Recycled Hydraulic oil	1,500		
	(NON Hazardous)			

Subject to Section 7 of Conditions of applicable bill of lading, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement.

The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of Consignor)

Freight charges are PREPAID unless marked collect.

CHECK BOX IF COLLECT ☐

Received $ to apply in prepayment of the charges on the property described hereon.

Agent or Cashier

Per (The signature here acknowledges only the amount prepaid.)

Charges Advanced:

$

* If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading state whether it is "carrier's or shipper's weight."
NOTE - Where the rate is dependent on value shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
Liability Limitation for loss or damage on this shipment may be applicable. See 49 U.S.C. § 14706(c)(1)(A) and (B).

per Ray M

† "The fibre boxes used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of Uniform Freight Classification."
† Shipper's imprint in lieu of stamp; not a part of bill of lading approved by the Interstate Commerce Commission.

Agent must detach and retain this Shipping Order and must sign the Original Bill of Lading.

DUBRO OIL CORP. Shipper, Per 10-11-10

2400 Mulberry St. • Cleveland, Ohio 44113
Permanent post-office address of shipper

carbonless

REDIFORM® 6S696 Rev, 5/98
POLYPAK (50 SETS) 6S696

THIS SHIPPING ORDER must be legibly filled in, in ink, in indelible Pencil, or in Carbon, and retained by the Agent.

RECEIVED, subject to individually determined rates or contracts that have been agreed upon in writing between the carrier and shipper, if applicable, otherwise to the rates, classifications and rules that have been established by the carrier and are available to the shipper, on request;

11-11-10 Carrier DUBRO

Carrier's Pro No.
Shipper's Bill of Lading No.
Consignee's Reference/PO No.
Carrier's Code (SCAC)

at Cleveland, Ohio from DUBRO OIL CORP.

the property described below in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated below, which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of, said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in Uniform Freight Classification in effect on the date hereof, if this is a rail or a rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment.

Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

Consigned to CANTON Drop Forge

(Mail or street address of consignee—For purposes of notification only.)

Destination CANTON State Ohio Zip Code 44706 County

Delivery Address ★ 4575 SouthWAY ST SW

(★ To be filled in only when shipper desires and governing tariffs provide for delivery thereat.)

Route 77 South

Delivering Carrier DUBRO Car or Vehicle Initials No.

No. Packages		*Weight (Sub. to Cor.)	Class or Rate	Check Column
3	TOTES 500 Forging LUB	2400		
3	TOTES 700 Forging LUB	2400		
	(NON HAZARDOUS)			
	Ray Mitchell 11/11/10			

Subject to Section 7 of Conditions of applicable bill of lading, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement.

The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of Consignor)

Freight charges are PREPAID unless marked collect.

CHECK BOX IF COLLECT ☐

Received $ to apply in prepayment of the charges on the property described hereon.

Agent or Cashier

Per (The signature here acknowledges only the amount prepaid.)

Charges Advanced:

* If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading state whether it is "carrier's or shipper's weight."
NOTE - Where the rate is dependent on value shippers are required to state specifically in writing the agreed or declared value of the property.

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding

Liability Limitation for loss or damage on this shipment may be applicable. See 49 U.S.C. § 14706(c)(1)(A) and (B).

per

† "The fibre boxes used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of Uniform Freight Classification."
† Shipper's imprint in lieu of stamp; not a part of bill of lading approved by the Interstate Commerce Commission.

DUBRO OIL CORP. Shipper, Per 11-11-10

2400 Mulberry St. • Cleveland, Ohio 44113
Permanent post-office address of shipper

Agent must detach and retain this Shipping Order and must sign the Original Bill of Lading.

2

REDIFORM® 6S696 Rev, 5/98
POLYPAK (50 SETS) 6S696

carbonless

Paul Stanley

Ray Mitchell

TOTAL	ITEM NUMBER	REMARKS:
TYPE STEEL:		NO. OF @ LBS. EA.
		GROSS WT.

SHIP 006 REV 1

SHIPPING NOTICE

DROP FORGE *HIGH PERFORMANCE CLOSED DIE FORGINGS*

SOUTHWAY ST., S.W. • P.O. BOX 6902
CANTON, OHIO 44706

PH. 330 / 477-4511
FAX 330 / 477-2046

No. 09706

DATE SHIPPED 12-11-10

SOLD TO
DUBRO OIL
2400 MULBERRY ST
CLEVELAND OH 44113

SHIP TO
SAME

CUSTOMER ORDER NO.	OUR JOB	BILL OF LADING NO.	COLLECT / PREPAID
CDF PO #10-0098			
PART NAME	DIE NO.	SHIPPED VIA:	
PART NUMBER	CHANGE	VENDOR TRK	

PIECES	SERIAL NUMBER	MILL	HEAT NUMBER	HEAT CODE	LOT	WEIGHT UNIT	WEIGHT TOTAL
2	GALLONS NON HAZARDOUS HYDRAULIC OIL					300GAL	500 GAL
2	GALLONS NONHAZARDOUS RECYCLE OIL					300GAL	600 GAL

Paul Stanley

Ray [illegible]

TOTAL	ITEM NUMBER	REMARKS:
TYPE STEEL:		NO. OF @ LBS. EA.
		GROSS WT.

SHIP 006 REV 1

QUALITY CONTROL

SHIPPING NOTICE

CANTON DROP FORGE *HIGH PERFORMANCE CLOSED DIE FORGINGS*

4575 SOUTHWAY ST., S.W. • P.O. BOX 6902
CANTON, OHIO 44706

PH. 330 / 477-4511
FAX 330 / 477-2046

No. 09728

DATE SHIPPED 12/1/10

SOLD TO
DUBRO OIL
2400 MULBERRY ST
CLEVELAND OH 44113

SHIP TO
SAME

CUSTOMER ORDER NO.	OUR JOB	BILL OF LADING NO.	COLLECT / PREPAID
CDF PO #10-0098			
PART NAME	DIE NO.	SHIPPED VIA:	
PART NUMBER	CHANGE	VENDOR TRK	

PIECES	SERIAL NUMBER	MILL	HEAT NUMBER	HEAT CODE	LOT	WEIGHT UNIT	WEIGHT TOTAL
3	NON HAZARDOUS HYDRAULIC OIL RECLAIM					300 GAL	900 GAL
3	NON HAZARDOUS HYDRAULIC OIL RECYCLE					300	900

Ray McDell

TOTAL	ITEM NUMBER	REMARKS:
TYPE STEEL:		Paul Stanley
		NO. OF ~ @ LBS. EA.
		GROSS WT.

SHIP 006 REV 1

SHIPPING NOTICE

CANTON DROP FORGE

HIGH PERFORMANCE CLOSED DIE FORGINGS

4575 SOUTHWAY ST., S.W. • P.O. BOX 6902
CANTON, OHIO 44706

PH. 330 / 477-4511
FAX 330 / 477-2046

No. **05866**

DATE SHIPPED 3/31/10

SOLD TO
DUBRO OIL
2400 MULBERRY ST
CLEVELAND OH 44113-1196

SHIP TO
SAME

CUSTOMER ORDER NO.	OUR JOB	BILL OF LADING NO.	COLLECT / PREPAID
CDF PO ~~#06-0012~~ 10-0103			
PART NAME	DIE NO.	SHIPPED VIA:	
PART NUMBER	CHANGE	VENDOR TRK	

PIECES	SERIAL NUMBER	MILL	HEAT NUMBER	HEAT CODE	LOT	WEIGHT UNIT	WEIGHT TOTAL
6	DUBRO 500 RECYCLE					200 lbs	1200 lbs

TOTAL	ITEM NUMBER	REMARKS:
6		

TYPE STEEL:

NO. OF @ LBS. EA.

GROSS WT.

SHIP 006 REV 1

SHIPPING NOTICE

CANTON DROP FORGE

HIGH PERFORMANCE CLOSED DIE FORGINGS

4575 SOUTHWAY ST., S.W. • P.O. BOX 6902
CANTON, OHIO 44706

PH. 330 / 477-4511
FAX 330 / 477-2046

No. 09728

DATE SHIPPED 12/1/10

SOLD TO
DUBRO OIL
2400 MULBERRY ST
CLEVELAND OH 44113

SHIP TO
SAME

CUSTOMER ORDER NO.	OUR JOB	BILL OF LADING NO.	COLLECT / PREPAID
CDF PO #10-0098			
PART NAME	DIE NO.	SHIPPED VIA:	
PART NUMBER	CHANGE	VENDOR TRK	

PIECES	SERIAL NUMBER	MILL	HEAT NUMBER	HEAT CODE	LOT	WEIGHT UNIT	WEIGHT TOTAL
3	NON HAZARDOUS HYDRAULIC OIL RECLAIM					300 GAL	900 GAL
1	NON HAZARDOUS HYDRAULIC OIL RECYCLE					300	300

Ray McDaniel

TOTAL | ITEM NUMBER | REMARKS:

Paul Stanley

TYPE STEEL:

NO. OF @ LBS. EA.

GROSS WT.

SHIP 006 REV 1

Dubro Oil

PROFILE # 0002

Dubro Oil Corporation
2400 Mulberry Street
Cleveland, Ohio 44113
Phone: (216) 696-2646

WASTE PROFILE

A. GENERATOR INFORMATION

Generator Name: Canton Drop Forge

Address: 4575 Southway ST SW

City: Canton State: OH Zip: 44706

Technical Contact Name: Sean Denman Phone: 330-477-4511

email: sdenman@cantondropforge.com Fax: 330-477-2046

USEPA ID # CHD004465142 ☐ CESQG ☐ SQG ☐ LQG

B. BILLING INFORMATION

☒ SAME AS GENERATOR

Customer Name:

Address:

City: State: Zip:

Contact: Phone:

email: Fax:

C. SHIPPING INFORMATION

Proper DOT Shipping Name: Waste Oil

Shipping Volume: 450 ☒ gallons ☐ drums ☐ pounds ☐ other

Container Type: Tote Size: 450 Gallon

Frequency: ☐ Day ☐ Week ☒ Month ☐ Qtr ☐ Year ☐ Once

D. MATERIAL DESCRIPTION

Common Name: WASTE OIL

Specific Process Generating Material: Used For Forging Hot Steel So Forge Die Does NOT Stick Does NOT come in contact WITH ANY other oils or Solvents

E. CHEMICAL COMPOSITION

COMPONENT	RANGE				PERCENT	PPM
Oil	MIN	85	MAX	95	☒	☐
Water	MIN	14	MAX	4	☒	☐
Dirt	MIN	1	MAX	1	☒	☐
	MIN		MAX		☐	☐

Analytical Attached: ☒ Yes ☐ No

- MSDS

F. PHYSICAL PROPERTIES

Liquid: 99 %

Solid: 1 % Phases: ☐ Single ☐ Double ☐ Multi

Sludge: ____ %

Color: Black

Odor: ____

Physical State at 70oF: ☐ Solid ☒ Liquid ☐ Sludge ☐ Dust

pH: ☐ <2 ☐ 2.1 - 4.9 ☒ 5-10 ☐ 10.1-12.4 ☐ >12.5

Flashpoint: ☐ <100oF ☐ 101-139oF ☐ 140-199oF ☒ >200oF

G. REGULATORY INFORMATION

Is this an EPA RCRA listed hazardous waste (F, K, P, U)?	☐	Y	☐	N
Is this an EPA RCRA characteristic waste (D001-D043)?	☐	Y	☐	N
Is this material produced from a renewable source?	☐	Y	☐	N
Is this a PCB waste regulated by TSCA? (PCB≥ 50 PPM)	☐	Y	☒	N
Does this material contain any detectable PCBs? (2 PPM or more)	☐	Y	☒	N
Does this material contain petroleum products other than used oil?	☐	Y	☒	N
Does this waste stream contain used oil?	☐	Y	☐	N
Is this used oil mixed with either listed or characteristic hazardous waste generated by a CESQG?	☐	Y	☒	N
If the used oil is mixed with either listed or characteristic hazardous waste, dies the resulting mixture result in exhibiting any characteristic of hazardous waste?	☐	Y	☒	N
Does this used oil stream contain >1000 PPM of halogens? If no, attach rebuttable presumption (i.e. MSDS, purchase orders, invoice, shipping ticket, hazardous waste generator status, detailed explanation of process generating waste)	☐	Y	☐	N
Analytical data or rebuttable presumption attached?	☐	Y	☒	N

H. HAZARDOUS CHARACTERISTICS

Contains: ☐ Asbestos __ % ☐ Herbicides/Pesticides __ % ☐ Radioactive ☐ Biological/Infectious

☐ Reactive ☐ Explosive ☐ Pyrophoric ☐ Fuming ☐ Shock ☐ Air Reactive ☐ Water Reactive

I hereby certify that the information contained in this profile form is accurate and complete. There have been no deliberate omissions or falsification of information pertaining to the composition, properties, and hazards associated with this waste, and all known or suspected hazards have been disclosed.

Generator Signature: Sean Denman Title (Print): Director - Safety

Name (Print): Sean Denman Date: 5/30/12

THIS MEMORANDUM is an acknowledgment that a Bill of Lading has been issued and is not the Original Bill of Lading, nor a copy or duplicate, covering the property named herein, and is intended solely for filing or record. 50

Shipper's No.

Carrier's Name: DuBro Oil Pick up

Carrier's No. OHD 658 383 126

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of lading,

at (Date) FROM Canton Drop

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as shown below, which said company (the word company being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in the Uniform Freight Classification in effect on the date hereof, if this is a rail or rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

Consigned TO DuBro Oil (Mail or street address for purposes of notification only.)

On Collect on Delivery Shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

Destination Street City

County State Zip

Route Delivery Address ★ 2400 Mulberry

(★To be filled in only when shipper desires and governing tariffs provide for delivery thereat.)

Delivering Carrier DuBro Oil Car or Vehicle Initials and No.

Collect on Delivery $ N/C And Remit to

Street City State

No. Packages	H.M.	Kind of Package, Description of Articles, Special Marks, and Exceptions	*Weight (Subject to Correction)	Class or Rate	Check Column
3		Totes For Recycley	6000		
		Paid Blank			

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.
NOTE—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding per

Subject to Section 7 of conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of consignor.)

C. O. D. Charges to be Paid by
☐ Shipper ☐ Consignee

If charges are to be prepaid, write or stamp here, "To be Prepaid."

N/C

Received $ to apply in prepayment of the charges on the property described hereon.

Agent or Cashier

Per
(The signature here acknowledges only the amount prepaid.)

Charges Advanced:

$

"The ribre containers used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of Rule 41 of the Uniform Freight Classification and Rule 5 of the National Motor Freight Classification."
† Shipper's imprint in lieu of stamp; not a part of bill of lading approved by the Interstate Commerce Commission.

Canton Drop Forge Shipper, Per Agent

Permanent post-office address of shipper, 4575 Southway St Canton Ohio Per

3

THIS MEMORANDUM is an acknowledgment that a Bill of Lading has been issued and is not the Original Bill of Lading, nor a copy or duplicate, covering the property named herein, and is intended solely for filing or record. 74

Shipper's No. OHDO 4465142

Carrier's Name: Dubro Oil - Pick up

Carrier's No. OHDO 383126

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of lading,

at _____ (Date) 4-23-12 FROM Canton Drop Forge

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as shown below, which said company (the word company being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in the Uniform Freight Classification in effect on the date hereof, if this is a rail or rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

(Mail or street address for purposes of notification only.)

Consigned TO Dubro Oil

On Collect on Delivery Shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

Destination Cleveland Street 2400 Mulberry City

County _____ State _____ Zip

Route _____ Delivery Address ★ 2400 Mulberry St

(★To be filled in only when shipper desires and governing tariffs provide for delivery thereat.)

Delivering Carrier Dubro Oil Car or Vehicle Initials and No. PS

Collect on Delivery $ _____ And Remit to _____

Street _____ City _____ State

No. Packages	H.M.	Kind of Package, Description of Articles, Special Marks, and Exceptions	*Weight (Subject to Correction)	Class or Rate	Check Column
3		totes 500R for Recycle + Return	3,000		
		(NON HAZARDOUS)			
		WAT profile 0002			
		MSDS on file at Dubro Oil			
		Paul Brendy	4-24-12		

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight

NOTE — Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per _____

Subject to Section 7 of conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement.

The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of consignor)

C. O. D. Charges to be Paid by ☐ Shipper ☐ Consignee

If charges are to be prepaid, write or stamp here, "To be Prepaid."

Received $ _____ to apply in prepayment of the charges on the property described hereon.

Agent or Cashier

Per _____

(The signature here acknowledges only the amount prepaid.)

Charges Advanced

$ _____

† "The fibre containers used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of Rule 41 of the Uniform Freight Classification and Rule 5 of the National Motor Freight Classification."

† Shipper's imprint in lieu of stamp, not a part of bill of lading approved by the Interstate Commerce Commission.

Canton Drop Forge Shipper, Per [redacted] 4-23-12 _____ Agent

Permanent post-office address of shipper, 4575 southway st Canton Ohio Per

3 44706

THIS MEMORANDUM is an acknowledgment that a Bill of Lading has been issued and is not the Original Bill of Lading, nor a copy or duplicate, covering the property named herein, and is intended solely for filing or record. 7

WAST PROFILE 00

Shipper's No.

Carrier's Name: DuBro Oil Pick up

Carrier's No. OHD 658383126

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of lading,

at (Date) FROM CANTON Drop

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as shown below, which said company (the word company being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in the Uniform Freight Classification in effect on the date hereof, if this is a rail or rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

(Mail or street address for purposes of notification only)

Consigned TO DuBro Oil

On Collect on Delivery Shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

Destination CLEVELAND Street MULBERRY ST City

County State Ohio Zip

Route CLEVELAND OHIO Delivery Address ★ 2400 MULBERRY ST

(★ To be filled in only when shipper desires and governing tariffs provide for delivery thereat.)

Delivering Carrier DuBro Oil Car or Vehicle Initials and No. TPL

Collect on Delivery $ N/C And Remit to

Street City State

Subject to Section 7 of conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of consignor)

C. O. D. Charges to be Paid by ☐ Shipper ☐ Consignee

If charges are to be prepaid, write or stamp here, "To be Prepaid."

Received $ to apply in prepayment of the charges on the property described hereon.

N C

Agent or Cashier

Per

(The signature here acknowledges only the amount prepaid.)

Charges Advanced:

$

No. Packages	H.M.	Kind of Package, Description of Articles, Special Marks, and Exceptions	*Weight (Subject to Correction)	Class or Rate	Check Column
3		Totes Forge Lub For Recycled	6000		
		(NON HAZARDOUS)			
		WASTPro File (0002)			
		MSDS on File			

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.
NOTE — Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding per

Paul S 5-8-12

† "The fibre containers used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of Rule 41 of the Uniform Freight Classification and Rule 5 of the National Motor Freight Classification."
† Shipper's imprint in lieu of stamp; not a part of bill of lading approved by the Interstate Commerce Commission.

CANTON Drop Shipper, Per Agent

Permanent post-office address of shipper, 4575 SOUTHWAY ST CANTON OHIO Per

3

THIS MEMORANDUM is an acknowledgment that a Bill of Lading has been issued and is not the Original Bill of Lading, not a copy or duplicate, covering the property named herein, and is intended solely for filing or record. 6

Shipper's No. 0002

Carrier's Name: DuBro oil Pick-up

Carrier's No. OKP658383126

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of lading,

at CLEVELAND (Date) 6-26-12 FROM

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as shown below, which said company (the word company being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in the Uniform Freight Classification in effect on the date hereof, if this is a rail or rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

(Mail or street address for purposes of notification only)

Consigned TO DuBro oil

On Collect on Delivery Shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

Destination CLEVELAND Street 2400 Mulberry ST City

County State Zip

Route CLEVELAND Ohio Delivery Address★ 2400 Mulberry

(★To be filled in only when shipper desires and governing tariffs provide for delivery thereat.)

Delivering Carrier DuBro oil Car or Vehicle Initials and No.

Collect on Delivery $ N/C And Remit to

Street City State

No. Packages	H.M	Kind of Package, Description of Articles, Special Marks, and Exceptions	*Weight (Subject to Correction)	Class or Rate	Check Column
3		Totes For Recycle 500P	6000		
		(NON HAZARDOUS)			
		WHST PROFILE 0002			
		MSDS ON FILE			

Paid Stanley

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.
NOTE — Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding per

Subject to Section 7 of conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of consignor.)

C. O. D. Charges to be Paid by ☐ Shipper ☐ Consignee

If charges are to be prepaid, write or stamp here, "To be Prepaid."

Received $ to apply in prepayment of the charges on the property described hereon.

Agent or Cashier

Per (The signature here acknowledges only the amount prepaid.)

Charges Advanced.

$

† "The fibre containers used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of Rule 41 of the Uniform Freight Classification and Rule 5 of the National Motor Freight Classification."

† Shipper's imprint in lieu of stamp, not a part of bill of lading approved by the Interstate Commerce Commission.

CANTON Drop Forge Shipper, Per 6-26-12

Permanent post-office address of shipper, 4575 SOUTHWAY ST CANTON Ohio

Agent

Per

3 44706

THIS MEMORANDUM is an acknowledgment that a Bill of Lading has been issued and is not the Original Bill of Lading, nor a copy or duplicate, covering the property named herein, and is intended solely for filing or record. 92

Shipper's No.

Carrier's Name: DuBro Oil. Pick up

Carrier's No. OHD058383126

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of lading,

at Cleveland Ohio (Date) 8-1-12 FROM Canton Drop Forge

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as shown below, which said company (the word company being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in the Uniform Freight Classification in effect on the date hereof, if this is a rail or rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

(Mail or street address for purposes of notification only.)

Consigned TO DuBro Oil

On Collect on Delivery Shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

Destination Cleveland Ohio Street 2400 Mulberry St City

County State Zip

Delivery Address ★ 2400 Mulberry

Route

(★To be filled in only when shipper desires and governing tariffs provide for delivery thereat.)

Delivering Carrier DuBro Oil Car or Vehicle Initials and No.

Collect on Delivery $ N/C And Remit to

Street City State

Subject to Section 7 of conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement

The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges

(Signature of consignor)

C. O. D. Charges to be Paid by ☐ Shipper ☐ Consignee

If charges are to be prepaid, write or stamp here, "To be Prepaid."

Received $ to apply in prepayment of the charges on the property described hereon.

Agent or Cashier

Per

(The signature here acknowledges only the amount prepaid.)

Charges Advanced

$

† "The fibre containers used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of Rule 41 of the Uniform Freight Classification and Rule 5 of the National Motor Freight Classification"

† Shipper's imprint in lieu of stamp; not a part of Bill of lading approved by the Interstate Commerce Commission

No. Packages	H.M.	Kind of Package, Description of Articles, Special Marks, and Exceptions	*Weight (Subject to Correction)	Class or Rate	† Check Column
4		Totes of 500 Recycle	2000		
		(NON HAZARDOUS)			
		WAST PROFILE 0002			
		MSDS ON FILE			

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight

NOTE — Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding per

Canton Drop Forge Shipper, Per

Permanent post-office address of shipper, 2575 Southway St Canton Ohio

Agent

Per

3 44706

THIS MEMORANDUM is an acknowledgment that a Bill of Lading has been issued and is not the Original Bill of Lading, nor a copy or duplicate, covering the property named herein, and is intended solely for filing or record.

Shipper's No. OhD 00 4465 142

Carrier's Name: DuBro OIL (Pick up)

Carrier's No. OhD 658 399126

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of lading,

at Cleveland Ohio (Date) 4-19-11 FROM Canton Drop Forge

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as shown below, which said company (the word company being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in the Uniform Freight Classification in effect on the date hereof, if this is a rail or rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

(Mail or street address for purposes of notification only)

Consigned TO DuBro oil

On Collect on Delivery Shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

Destination Cleveland Street Mulberry City

County State 44113 Zip

Route Cleveland Ohio Delivery Address★ 2400 Mulberry ST

(★To be filled in only when shipper desires and governing tariffs provide for delivery thereat.)

Delivering Carrier DuBro oil Car or Vehicle Initials and No.

Collect on Delivery $ N/A And Remit to

Street City State

Subject to Section 7 of conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:

The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of consignor)

C. O. D. Charges to be Paid by ☐ Shipper ☐ Consignee

If charges are to be prepaid, write or stamp here, "To be Prepaid."

Received $ to apply in prepayment of the charges on the property described hereon.

N C

Agent or Cashier

Per

(The signature here acknowledges only the amount prepaid.)

Charges Advanced

$

No. Packages	H.M.	Kind of Package, Description of Articles, Special Marks, and Exceptions	*Weight (Subject to Correction)	Class or Rate	Check Column
3		Totes used Forge Lub	3,000		
		For Recycled and Return			
		(Non Hazardous)			
		Waste Profile 0002			
		In the office +			
		MSDS on file at DuBro oil			

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.

NOTE—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding per

† The fibre containers used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of Rule 41 of the Uniform Freight Classification and Rule 5 of the National Motor Freight Classification.

‡ Shipper's imprint in lieu of stamp, not a part of bill of lading approved by the Interstate Commerce Commission.

Canton Drop Forge Shipper, Per 4/19/11 Agent

Permanent post-office address of shipper, 4575 South Way ST Canton Ohio 44706 Per

3

THIS MEMORANDUM is an acknowledgment that a Bill of Lading has been issued and is not the Original Bill of Lading, nor a copy or duplicate, covering the property named herein, and is intended solely for filing or record.

Shipper's No. OHD 004465142

Carrier's Name: DuBro Oil Pick up

Carrier's No. OHD 658383126

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of lading,

at Cleveland (Date) 4-19-11 FROM Canton Drop Forge

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned and destined as shown below, which said company (the word company being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in the Uniform Freight Classification in effect on the date hereof, if this is a rail or rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

(Mail or street address for purposes of notification only.)

Consigned TO DuBro Oil

On Collect on Delivery Shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

Destination Cleveland Street Mul Berry City

County State 44113 Zip

Route Cleveland Ohio Delivery Address ★ 2400

(★To be filled in only when shipper desires and governing tariffs provide for delivery thereat.)

Delivering Carrier DuBro Car or Vehicle Initials and No.

Collect on Delivery $ N/C And Remit to

Street City State

No. Packages	H.M.	Kind of Package, Description of Articles, Special Marks, and Exceptions	*Weight (Subject to Correction)	Class or Rate	Check Column
3		Totes Hydracl	3,000		
		For Recycle and Return			
		Wast Profile # 0001			
		on file + MSDS on file			
		at DuBro			
		Ray Mitchell 4/19/11 per			

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight

NOTE—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding

Subject to Section 7 of conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement

The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges

(Signature of consignor)

C. O. D. Charges to be Paid by ☐ Shipper ☐ Consignee

If charges are to be prepaid, write or stamp here, "To be Prepaid"

Received $ to apply in prepayment of the charges on the property described hereon

N/C

Agent or Cashier

Per (The signature here acknowledges only the amount prepaid.)

Charges Advanced

$

†"The fibre containers used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of Rule 41 of the Uniform Freight Classification and Rule 5 of the National Motor Freight Classification"

†Shipper's imprint in lieu of stamp, not a part of bill of lading approved by the Interstate Commerce Commission

Canton Drop Forge Shipper, Per Agent

Permanent post-office address of shipper, 4575 Southway St Canton Ohio 44706 Per

3

THIS MEMORANDUM is an acknowledgment that a Bill of Lading has been issued and is not the Original Bill of Lading, nor a copy or duplicate, covering the property named herein, and is intended solely for filing or record. 16

Shipper's No. OHD 00 4465 13

Carrier's Name: DuBro oil Pick up

Carrier's No. OHD 658383126

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of lading,

at CLEVELAND Ohio (Date) FROM CANTON Drop Forge

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as shown below, which said company (the word company being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in the Uniform Freight Classification in effect on the date hereof, if this is a rail or rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns

(Mail or street address for purposes of notification only)

Consigned TO DuBro oil

On Collect on Delivery Shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

Destination CLEVELAND Street MulBerry City

County State Zip

Route CLEVELAND Ohio Delivery Address★ 2400 MulBerry ST

(★To be filled in only when shipper desires and governing tariffs provide for delivery thereat)

Delivering Carrier DuBro oil Car or Vehicle Initials and No. PS

Collect on Delivery $ N/C And Remit to

Street City State

No. Packages	H.M	Kind of Package, Description of Articles, Special Marks, and Exceptions	*Weight (Subject to Correction)	Class or Rate	Check Column
3		Totes used Forge Lub	3,000		
		For Recycle AND Return			
		(NON HAZARDous)			
		WAST ProFile 0002			
		MSDS ALL ON FILE			
		AT DuBro OFFICE			

Ray McClelland

5/11/11 per

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight

NOTE — Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding

Subject to Section 7 of conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement

The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges

(Signature of consignor)

C. O. D. Charges to be Paid by ☐ Shipper ☐ Consignee

If charges are to be prepaid, write or stamp here, "To be Prepaid."

Received $ to apply in prepayment of the charges on the property described hereon.

N C

Agent or Cashier

Per

(The signature here acknowledges only the amount prepaid)

Charges Advanced:

$

† "The fibre containers used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of Rule 41 of the Uniform Freight Classification and Rule 5 of the National Motor Freight Classification"

† Shipper's imprint in lieu of stamp, not a part of bill of lading approved by the Interstate Commerce Commission

CANTON Drop Forge Shipper, Per Agent

Permanent post-office address of shipper, 4575 SouthWAY ST CANTON Ohio 44706 Per

3

THIS MEMORANDUM is an acknowledgment that a Bill of Lading has been issued and is not the Original Bill of Lading, nor a copy or duplicate, covering the property named herein, and is intended solely for filing or record. 20

Shipper's No. OHD 00 4465143

Carrier's Name: DuBro Oil Pick up

Carrier's No. OHD 658383128

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of lading.

at _____ (Date) 5-31-11 FROM CANTON Drop Forge

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as shown below, which said company (the word company being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in the Uniform Freight Classification in effect on the date hereof, if this is a rail or rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns

Consigned TO DuBro Oil (Mail or street address for purposes of notification only)

On Collect on Delivery Shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

Destination CLEVELAND Street 2400 MulBerry City

County _____ State _____ Zip _____

Route _____ Delivery Address ★ 2400 MulBerry ST

(★ To be filled in only when shipper desires and governing tariffs provide for delivery thereat)

Delivering Carrier DuBro Oil Car or Vehicle Initials and No. PS

Collect on Delivery $ _____ And Remit to _____

Street _____ City _____ State _____

No. Packages	H.M.	Kind of Package, Description of Articles, Special Marks, and Exceptions	*Weight (Subject to Correction)	Class or Rate	Check Column
3		Tote 500R For Recycle + Return	3,000		
		(NON HAZARDOUS)			
		WAST Profile 0002			
		MSDS ON File AT DuBro Oil			
		Ray McCall 5/31/11			

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight

NOTE — Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per _____

Subject to Section 7 of conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement

The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges

(Signature of consignor)

C. O. D. Charges to be Paid by ☐ Shipper ☐ Consignee

If charges are to be prepaid, write or stamp here, "To be Prepaid."

Received $ _____ to apply in prepayment of the charges on the property described hereon

Agent or Cashier

Per _____

(The signature here acknowledges only the amount prepaid.)

Charges Advanced:

$ _____

† "The fibre containers used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of Rule 41 of the Uniform Freight Classification and Rule 5 of the National Motor Freight Classification."

† Shipper's imprint in lieu of stamp; not a part of bill of lading approved by the Interstate Commerce Commission

CANTON Drop Forge Shipper, Per 5-31-11 _____ Agent

Permanent post-office address of shipper, 4575 SouthWAY ST CONTON, Ohio 44706 Per _____

3

THIS MEMORANDUM is an acknowledgment that a Bill of Lading has been issued and is not the Original Bill of Lading, or a copy or duplicate, covering the property named herein, and is intended solely for filing or record. 31

Shipper's No. OHD 004465142

Carrier's Name: DuBro Oil Pick up

Carrier's No. OHD 658389126

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of lading,

at _____ (Date) _____ FROM Canton Drop Forge

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as shown below, which said company (the word company being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in the Uniform Freight Classification in effect on the date hereof, if this is a rail or rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns

Consigned TO DuBro Oil (Mail or street address for purposes of notification only)

On Collect on Delivery Shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

Destination Cleveland Ohio Street Mulberry City

County State Zip

Route Delivery Address ★ 2400 Mulberry ST

(★To be filled in only when shipper desires and governing tariffs provide for delivery thereat.)

Delivering Carrier DuBro Oil Car or Vehicle Initials and No. PS

Collect on Delivery $ N/C And Remit to

Street City State

No. Packages	H.M.	Kind of Package, Description of Articles, Special Marks, and Exceptions	*Weight (Subject to Correction)	Class or Rate	Check Column
3		Totes 500 R For Recycle +			
		retiune (NON HAZARDOUS)			
		WAST Profile 0002			
		MSDS on File at DuBro Oil			
		Ray C. McDaniel			

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.
NOTE—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding per

Subject to Section 7 of conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement

The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges

(Signature of consignor)

C. O. D. Charges to be Paid by ☐ Shipper ☐ Consignee

If charges are to be prepaid, write or stamp here, "To be Prepaid."

Received $ _____ to apply in prepayment of the charges on the property described hereon.

Agent or Cashier

Per

(The signature here acknowledges only the amount prepaid.)

Charges Advanced

$

† "The fibre containers used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of Rule 41 of the Uniform Freight Classification and Rule 5 of the National Motor Freight Classification"

† Shipper's imprint in lieu of stamp, not a part of bill of lading approved by the Interstate Commerce Commission

Canton Drop Forge Shipper, Per _____ Agent

Permanent post-office address of shipper, 4575 Southway Canton Ohio 44706 Per

3

THIS MEMORANDUM is an acknowledgment that a Bill of Lading has been issued and is not the Original Bill of Lading, nor a copy or duplicate, covering the property named herein, and is intended solely for filing or record. 38

Shipper's No. OhD 00446514

Carrier's Name: DuBro oil Pick up

Carrier's No. OhD658383126

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of lading,

at _____ (Date) 8-30-11 FROM CANTON Drop Forge

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as shown below, which said company (the word company being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in the Uniform Freight Classification in effect on the date hereof, if this is a rail or rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

Consigned TO DuBro oil (Mail or street address for purposes of notification only.)

On Collect on Delivery Shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

Destination CLEVELAND Street MulBerry ST City

County _____ State _____ Zip

Route CLEVELAND Ohio Delivery Address ★2400 MulBerry ST

(★To be filled in only when shipper desires and governing tariffs provide for delivery thereat.)

Delivering Carrier DuBro oil Car or Vehicle Initials and No. _____

Collect on Delivery $ N/C And Remit to _____

Street _____ City _____ State

No. Packages	H.M	Kind of Package, Description of Articles, Special Marks, and Exceptions	*Weight (Subject to Correction)	Class or Rate	Check Column
3		TOTES HYD For Recycle	4,000?		
		AND Return			
		(NON HAZARDOUS)			
		WAST ProFile 0001			
		MSDS ON FILE AT DuBro			

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.
NOTE—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per _____

Subject to Section 7 of conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of consignor.)

C. O. D. Charges to be Paid by ☐ Shipper ☐ Consignee

If charges are to be prepaid, write or stamp here, "To be Prepaid."

N C

Received $ _____ to apply in prepayment of the charges on the property described hereon.

Agent or Cashier

Per _____
(The signature here acknowledges only the amount prepaid.)

Charges Advanced.

$ _____

† "The fibre containers used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of Rule 41 of the Uniform Freight Classification and Rule 5 of the National Motor Freight Classification."

† Shipper's imprint in lieu of stamp; not a part of bill of lading approved by the Interstate Commerce Commission.

CANTON Drop Forge Shipper, Per _____

Bill Myers 8/30/11 Agent

Permanent post-office address of shipper, 4575 SouthWAY ST CANTON Ohio 44706

Per _____

3

QUL 1

Dubro Oil Corporation
2400 Mulberry Street
Cleveland, Ohio 44113
Phone: (216) 696-2646

WASTE PROFILE

PROFILE #

A. GENERATOR INFORMATION

Generator Name: CANTON DROP FORGE

Address: 4575 SOUTHWARD ST SW

City: CANTON State: OHIO Zip: 44706

Technical Contact Name: K HOUSENECHT Phone: 330-477-4511

email: KHOUSENECHT@CANTONDROPFORGE.COM Fax: 330-477-2046

USEPA ID # OHD 064465142 ☐ CESQG ☐ SQG ☒ LQG

B. BILLING INFORMATION

☒ SAME AS GENERATOR

Customer Name:

Address:

City: State: Zip:

Contact: Phone:

email: Fax:

C. SHIPPING INFORMATION

Proper DOT Shipping Name: WASTE OIL

Shipping Volume: 450 ☒ gallons ☐ drums ☐ pounds ☐ other

Container Type: TOTE Size: 450 GALLON

Frequency: ☐ Day ☐ Week ☒ Month ☐ Qtr ☐ Year ☐ Once

D. MATERIAL DESCRIPTION

Common Name: WASTE OIL

X Specific Process Generating Material: FORGING pump Coins to process

Is it contaminated?

E. CHEMICAL COMPOSITION

COMPONENT	RANGE				PERCENT	PPM
OIL	MIN	85	MAX	95	☒	☐
WATER	MIN	1	MAX	4	☒	☐
DIRT	MIN	1	MAX	1	☒	☐
	MIN		MAX		☐	☐

Analytical Attached: ☐ Yes ☒ No

F. PHYSICAL PROPERTIES

Liquid: 99 %

Solid: 1 % Phases: ☐ Single ☐ Double ☐ Multi

Sludge: ____ %

Color: BLACK

Odor: ____

Physical State at 70oF: ☐ Solid ☒ Liquid ☐ Sludge ☐ Dust

pH: ☐ <2 ☐ 2.1 - 4.9 ☒ 5-10 ☐ 10.1-12.4 ☐ >12.5

Flashpoint: ☐ <100oF ☐ 101-139oF ☐ 140-199oF ☒ >200oF

G. REGULATORY INFORMATION

Is this an EPA RCRA listed hazardous waste (F, K, P, U)?	☐ Y	☐ N		
Is this an EPA RCRA characteristic waste (D001-D043)?	☐ Y	☐ N		
Is this material produced from a renewable source?	☐ Y	☐ N		
Is this a PCB waste regulated by TSCA? (PCB≥ 50 PPM)	☐ Y	☑ N		
Does this material contain any detectable PCBs? (2 PPM or more)	☐ Y	☑ N		
Does this material contain petroleum products other than used oil?	☐ Y	☑ N		
Does this waste stream contain used oil?	☑ Y	☐ N		
Is this used oil mixed with either listed or characteristic hazardous waste generated by a CESQG?	☐ Y	☑ N	☐ NA	
If the used oil is mixed with either listed or characteristic hazardous waste, dies the resulting mixture result in exhibiting any characteristic of hazardous waste?	☐ Y	☑ N	☐ NA	
Does this used oil stream contain >1000 PPM of halogens? If no, attach rebuttable presumption (i.e. MSDS, purchase orders, invoice, shipping ticket, hazardous waste generator status, detailed explanation of process generating waste)	☐ Y	☐ N	☐ NA	
Analytical data or rebuttable presumption attached?	☐ Y	☑ N		

H. HAZARDOUS CHARACTERISTICS

Contains: ☐ Asbestos __ % ☐ Herbicides/Pesticides __ % ☐ Radioactive ☐ Biological/Infectious

☐ Reactive ☐ Explosive ☐ Pyrophoric ☐ Fuming ☐ Shock ☐ Air Reactive ☐ Water Reactive

I hereby certify that the information contained in this profile form is accurate and complete. There have been no deliberate omissions or falsification of information pertaining to the composition, properties, and hazards associated with this waste, and all known or suspected hazards have been disclosed.

Generator Signature: X [signature] Title (Print): X Mgr Pur Eng

Name (Print): X Ro Houserkneczit Date: X 1/12/11

Dubro Oil Corporation
2400 Mulberry Street
Cleveland, Ohio 44113
Phone: (216) 696-2646

WASTE PROFILE

PROFILE #

A. GENERATOR INFORMATION

Generator Name: CANTON DROP FORGE

Address: 4575 SOUTHWAY ST S.W.

City: CANTON State: OHIO Zip: 44706

Technical Contact Name: K HOUSEKNECHT Phone: 330 477 4511

email: KHOUSEKNECHT@CANTONDROPFORGE.COM Fax: 330 477 2046

USEPA ID # OHD 004465142 ☐ CESQG ☐ SQG ☒ LQG

B. BILLING INFORMATION

☒ SAME AS GENERATOR

Customer Name:

Address:

City: State: Zip:

Contact: Phone:

email: Fax:

C. SHIPPING INFORMATION

Proper DOT Shipping Name: WASTE OIL

Shipping Volume: ☐ gallons ☐ drums ☐ pounds ☐ other

Container Type: TOTE Size: 450 GAL

Frequency: ☐ Day ☐ Week ☒ Month ☐ Qtr ☐ Year ☐ Once

D. MATERIAL DESCRIPTION

Common Name: WASTE OIL

Specific Process Generating Material: HYDRAULIC OIL FOR FORGING TRIM PRESS & MANIPULATORS

E. CHEMICAL COMPOSITION

COMPONENT	RANGE				PERCENT	PPM
OIL	MIN	98.6	MAX	99.5	☐	☐
WATER	MIN	1.5	MAX	0.0	☐	☐
DIRT	MIN	.5	MAX	.5	☐	☐
	MIN		MAX		☐	☐

Analytical Attached: ☐ Yes ☒ No

F. PHYSICAL PROPERTIES

Liquid: 99.5 %

Solid: .5 % Phases: ☐ Single ☐ Double ☐ Multi

Sludge: — %

Color: BLACK

Odor: NONE

Physical State at 70°F: ☐ Solid ☒ Liquid ☐ Sludge ☐ Dust

pH: ☐ <2 ☐ 2.1 - 4.9 ☒ 5-10 ☐ 10.1-12.4 ☐ >12.5

Flashpoint: ☐ <100°F ☐ 101-139°F ☐ 140-199°F ☒ >200°F

G. REGULATORY INFORMATION

Is this an EPA RCRA listed hazardous waste (F, K, P, U)?	☐	Y	☐	N		
Is this an EPA RCRA characteristic waste (D001-D043)?	☐	Y	☐	N		
Is this material produced from a renewable source?	☐	Y	☐	N		
Is this a PCB waste regulated by TSCA? (PCB≥ 50 PPM)	☐	Y	☒	N		
Does this material contain any detectable PCBs? (2 PPM or more)	☐	Y	☒	N		
Does this material contain petroleum products other than used oil?	☐	Y	☒	N		
Does this waste stream contain used oil?	☒	Y	☐	N		
Is this used oil mixed with either listed or characteristic hazardous waste generated by a CESQG?	☐	Y	☒	N	☐	NA
If the used oil is mixed with either listed or characteristic hazardous waste, dies the resulting mixture result in exhibiting any characteristic of hazardous waste?	☐	Y	☒	N	☐	NA
Does this used oil stream contain >1000 PPM of halogens? If no, attach rebuttable presumption (i.e. MSDS, purchase orders, invoice, shipping ticket, hazardous waste generator status, detailed explanation of process generating waste)	☐	Y	☐	N	☐	NA
Analytical data or rebuttable presumption attached?	☐	Y	☐	N		

H. HAZARDOUS CHARACTERISTICS

Contains: ☐ Asbestos __ % ☐ Herbicides/Pesticides __ % ☐ Radioactive ☐ Biological/Infectious

☐ Reactive ☐ Explosive ☐ Pyrophoric ☐ Fuming ☐ Shock ☐ Air Reactive ☐ Water Reactive

I hereby certify that the information contained in this profile form is accurate and complete. There have been no deliberate omissions or falsification of information pertaining to the composition, properties, and hazards associated with this waste, and all known or suspected hazards have been disclosed.

Generator Signature: X [signature] Title (Print): X MCR PLT ENG

Name (Print): X K.J. HOUSEKNECHT Date: X 1/12/11

SHIPPING NOTICE

CANTON DROP FORGE
4575 SOUTHWAY ST., S.W. • P.O. BOX 6902
CANTON, OHIO 44706

HIGH PERFORMANCE CLOSED DIE FORGINGS

PH. 330 / 477-4511
FAX 330 / 477-2046

No. 09789

DATE SHIPPED 4/19/11

SOLD TO
DUBRO OIL CORP
2400 MULBERRY ST
CLEVELAND OH 44113-1196

SHIP TO
SAME

CUSTOMER ORDER NO.	OUR JOB	BILL OF LADING NO.	COLLECT / PREPAID
CDF PO #11-0010			
PART NAME	DIE NO.	SHIPPED VIA:	
PART NUMBER	CHANGE	VENDOR TRK	

PIECES	SERIAL NUMBER	MILL	HEAT NUMBER	HEAT CODE	LOT	WEIGHT UNIT	WEIGHT TOTAL
4	TOTES OF 500 DIE LUBE RECYCLE						

TOTAL	ITEM NUMBER	REMARKS:
TYPE STEEL:		NO. OF @ LBS. EA.
		GROSS WT.

Paul S
Ray M Ellend
4/19/11

SHIP 006 REV 1

SHIPPING NOTICE

CANTON DROP FORGE

HIGH PERFORMANCE CLOSED DIE FORGINGS

4575 SOUTHWAY ST., S.W. • P.O. BOX 6902
CANTON, OHIO 44706

PH. 330 / 477-4511
FAX 330 / 477-2046

No. **09796**

DATE SHIPPED 5/11/11

SOLD TO
dubro oi
DUBRO OIL COPR
2400 MULBERRY ST
CLEVELAND OH 44113

SHIP TO
SAME

CUSTOMER ORDER NO.	OUR JOB	BILL OF LADING NO.	COLLECT / PREPAID
CDF PO #11-0010			
PART NAME	DIE NO.	SHIPPED VIA:	
PART NUMBER	CHANGE	VENDOR TRK	

PIECES	SERIAL NUMBER	MILL	HEAT NUMBER	HEAT CODE	LOT	WEIGHT UNIT	WEIGHT TOTAL
4							
3	TOTES OF 500 DIE LUBE RECYCLE						

WAST PROFILE
0002

TOTAL	ITEM NUMBER	REMARKS:
TYPE STEEL:		NO. OF @ LBS. EA.
		GROSS WT.

SHIP 006 REV 1

SHIPPING NOTICE

CANTON DROP FORGE
HIGH PERFORMANCE CLOSED DIE FORGINGS
4575 SOUTHWAY ST., S.W. • P.O. BOX 6902
CANTON, OHIO 44706
PH. 330 / 477-4511
FAX 330 / 477-2046

No. 10564

DATE SHIPPED 8/4/11

SOLD TO
DUBRO OIL CORP
2400 MULBERRY ST
CLEVELAND OH 44113-1196

SHIP TO
SAME

CUSTOMER ORDER NO.	OUR JOB	BILL OF LADING NO.	COLLECT / PREPAID
CDF PO #11-0010			
PART NAME	DIE NO.	SHIPPED VIA:	
PART NUMBER	CHANGE	VENDOR TRK	

PIECES	SERIAL NUMBER	MILL	HEAT NUMBER	HEAT CODE	LOT	WEIGHT UNIT	WEIGHT TOTAL
3	TOTES OF 500 DIE LUBE RECYCLE					500 GAL	100 GAL

TOTAL 3

ITEM NUMBER

REMARKS:

TYPE STEEL:

NO. OF @ LBS. EA.

GROSS WT.

SHIP 006 REV 1

SHIPPING NOTICE

CANTON DROP FORGE *HIGH PERFORMANCE CLOSED DIE FORGINGS*

4575 SOUTHWAY ST., S.W. • P.O. BOX 6902
CANTON, OHIO 44706

PH. 330 / 477-4511
FAX 330 / 477-2046

No. 10596

DATE SHIPPED 9/13/11

SOLD TO
DUBRO OIL
2400 MULBERRY ST
CLEVELAND OH 44113

SHIP TO
SAME

CUSTOMER ORDER NO.	OUR JOB	BILL OF LADING NO.	COLLECT / PREPAID
CDF PO #11-0010			
PART NAME	DIE NO.	SHIPPED VIA:	
PART NUMBER	CHANGE	VENDOR TRK	

PIECES	SERIAL NUMBER	MILL	HEAT NUMBER	HEAT CODE	LOT	WEIGHT UNIT	WEIGHT TOTAL
	TOTES OF 500 DIE LUBE RECYCLE						

VOID

TOTAL	ITEM NUMBER	REMARKS:
TYPE STEEL:		NO. OF @ LBS. EA.
		GROSS WT.

SHIP 006 REV 1

(2)

Dubro Oil Corporation
2400 Mulberry Street
Cleveland, Ohio 44113
Phone: (216) 696-2646

WASTE PROFILE

PROFILE # 0002

A. GENERATOR INFORMATION

Generator Name: CANTON DROP FORGE

Address: 4575 SOUTHWAY ST S.W.

City: CANTON State: OHIO Zip: 44706

Technical Contact Name: KHOUSERNEGAT Phone: 330 477 4511

email: KHOUSERNEGAT@CANTONDROPFORGE.COM Fax: 330 477 2046

USEPA ID # OHD 004465142 ☐ CESQG ☐ SQG ☒ LQG

B. BILLING INFORMATION

☒ SAME AS GENERATOR

Customer Name:

Address:

City: State: Zip:

Contact: Phone:

email: Fax:

C. SHIPPING INFORMATION

Proper DOT Shipping Name: WASTE OIL

Shipping Volume: 450 ☒ gallons ☐ drums ☐ pounds ☐ other

Container Type: TOTE Size: 450 GALLON

Frequency: ☐ Day ☐ Week ☒ Month ☐ Qtr ☐ Year ☐ Once

D. MATERIAL DESCRIPTION

X Common Name: WASTE OIL

Specific Process Generating Material: USED FOR FORGING ON HOT STEEL SO FORGE DIE DOES NOT STICK. DOES NOT CODE IN CONTACT WIR ANY OTHER OILS OR SOLVENTS

E. CHEMICAL COMPOSITION

COMPONENT	RANGE				PERCENT	PPM
OIL	MIN	85	MAX	95	☒	☐
WATER	MIN	14	MAX	4	☒	☐
DIRT	MIN	1	MAX	1	☒	☐
	MIN		MAX		☐	☐

Analytical Attached: ☒ Yes ☒ No

• MSDS ALSO CHECK D-TECT TEST

②

F. PHYSICAL PROPERTIES

Liquid: 99 %

Solid: 1 % Phases: ☐ Single ☐ Double ☐ Multi

Sludge: ___ %

Color: BLACK

Odor: ___

Physical State at 70oF: ☐ Solid ☒ Liquid ☐ Sludge ☐ Dust

pH: ☐ <2 ☐ 2.1 - 4.9 ☒ 5-10 ☐ 10.1-12.4 ☐ >12.5

Flashpoint: ☐ <100oF ☐ 101-139oF ☐ 140-199oF ☒ >200oF

G. REGULATORY INFORMATION

Is this an EPA RCRA listed hazardous waste (F, K, P, U)?	☐ Y	☐ N		
Is this an EPA RCRA characteristic waste (D001-D043)?	☐ Y	☐ N		
Is this material produced from a renewable source?	☐ Y	☐ N		
Is this a PCB waste regulated by TSCA? (PCBs 50 PPM)	☐ Y	☒ N		
Does this material contain any detectable PCBs? (2 PPM or more)	☐ Y	☒ N		
Does this material contain petroleum products other than used oil?	☐ Y	☒ N		
Does this waste stream contain used oil?	☒ Y	☐ N		
Is this used oil mixed with either listed or characteristic hazardous waste generated by a CESQG?	☐ Y	☒ N	☐	NA
If the used oil is mixed with either listed or characteristic hazardous waste, dies the resulting mixture result in exhibiting any characteristic of hazardous waste?	☐ Y	☒ N	☐	NA
Does this used oil stream contain >1000 PPM of halogens? If no, attach rebuttable presumption (i.e. MSDS, purchase orders, invoice, shipping ticket, hazardous waste generator status, detailed explanation of process generating waste)	☐ Y	☐ N	☐	NA
Analytical data or rebuttable presumption attached?	☐ Y	☒ N		

H. HAZARDOUS CHARACTERISTICS

Contains: ☐ Asbestos __ % ☐ Herbicides/Pesticides __ % ☐ Radioactive ☐ Biological/Infectious

☐ Reactive ☐ Explosive ☐ Pyrophoric ☐ Fuming ☐ Shock ☐ Air Reactive ☐ Water Reactive

I hereby certify that the information contained in this profile form is accurate and complete. There have been no deliberate omissions or falsification of information pertaining to the composition, properties, and hazards associated with this waste, and all known or suspected hazards have been disclosed.

Generator Signature: X [signature] Title (Print): X Plc Pr Eng

Name (Print): X Ro Hoskinson Date: X 1/12/11

ATTACHMENT K

Preventative Maintenance Procedures

Task Report (Full List)

Site CDF
Task No. FS28
Description REMOVE OIL FROM CYL. OIL COLLECTION TANK

Assigned To 1490
WO Type ENVIRO
Expense Class

Priority 4.00
Multitask No
In-service Task Yes

Craft	Crew Size	Estimated Labor Hours
MEC-REPAIR	1.00	2.00
OILER	1.00	1.00

Equipment No. AFOG00
Equipment Description MISCELLANEOUS EQUIPMENT IN FORGE SHOP

Location FORGE SHOP
Sub-location 1 -
Sub-location 2 -
Sub-location 3 -
Date Last Performed 3/13/2012
Next Due Date 8/19/2012
Tenant

Perform Every 3.00 Month(s)
Schedule Type Duplicates
Task Duration
No. of Times Completed 47.00
Down Time
Must Be Down Yes

Meter Name	Last Performed At

Task Instructions

Instruction Code DS28 **Date Last Edited** 5/3/2000

PIPE FITTER TO CONNECT A PUMP TO THE TANK DRAIN.
OILER SHOULD DRAIN OFF ALL WATER FROM THE BOTTOM OF THE TANK.
PUMP THE OIL OUT TO 55 GAL DRUMS.
RECORD THE NUMBER OF DRUMS HERE_____

Task Report (Full List)

Site CDF
Task No. FS27
Description CHECK OIL/WATER SEPARATOR OPERATION

Assigned To 1490
WO Type PREVENT
Expense Class

Priority 3.00
Multitask No
In-service Task Yes

Craft	Crew Size	Estimated Labor Hours
ELECT	1.00	0.50

Equipment No. BFOG23
Equipment Description MACK INDUSTRIES GRIT TANK & SEPARATOR

Location YARD SOUTH OF FORGE SHOP
Sub-location 1 -
Sub-location 2 -
Sub-location 3 -
Date Last Performed 7/3/2012
Next Due Date 9/4/2012
Tenant

Perform Every 3.00 Month(s)
Schedule Type Duplicates
Task Duration
No. of Times Completed 26.00
Down Time
Must Be Down No

Meter Name	Last Performed At

Task Instructions

Instruction Code FS27 **Date Last Edited** 1/4/2000

PLEASE CHECK THE FORGE SHOP OIL/WATER SEPARATOR FOR THE FOLLOWING.
THE CONTROL PANEL LIGHT IS WORKING.
BOTH PUMPS ARE ON AUTO AND THE PUMPS ALTERNATE.
NO SEAL FAILURE LIGHTS ARE ON AND THE POWER HOUSE RED FLASHING LIGHT IS OFF.
BOTH PUMPS ARE ON IF ONE PUMP CAN NOT KEEP UP.
THE CONTROL PANEL IS CLOSED AND TIGHT.
CHECK TO BE SURE AN ELECTRICAL SCHEMATIC IS IN THE CONTROL PANEL.

Task Report (Full List)

Site CDF
Task No. FS03
Description INSPECT THE FORGE SHOP OIL/WATER SEPARATOR

Assigned To 1490
WO Type PREVENT
Expense Class

Priority 2.00
Multitask No
In-service Task Yes

Craft	Crew Size	Estimated Labor Hours
ELECT	1.00	1.00
MEC-REPAIR	1.00	1.00

Equipment No. BFOG23
Equipment Description MACK INDUSTRIES GRIT TANK & SEPARATOR

Location YARD SOUTH OF FORGE SHOP
Sub-location 1 -
Sub-location 2 -
Sub-location 3 -
Date Last Performed 7/3/2012
Next Due Date 9/17/2012
Tenant

Perform Every 90.00 Day(s)
Schedule Type Duplicates
Task Duration
No. of Times Completed 58.00
Down Time
Must Be Down No

Meter Name	Last Performed At

Task Instructions

Instruction Code FS03 **Date Last Edited** 9/2/2003

```
TAKE GAS DETECTION METER FOR CONFINED SPACE ENTRY.
TAKE TAPE MEASURE, RAGS,
FOLLOW CONFINED SPACE ENRTY PROCEEDURES IF YOU NEED TO GO INTO THE TANK.
MEASURE FLOAT POSITIONS FROM THE FLOAT HANGER DOWN TO THE TOP OF THE FLOAT AS IT HANGS
     LS1-PUMPS OFF-116
     LS2-LEAD PUMP ON-94 inches
     LS3-LAG PUMP ON & HIGH WATER ALARM-89 inches
     LS_-HIGH WATER ALARM(STORAGE)-72inches  This is really not used as of May 2000
CHECK TO BE SURE BOTH PUMPS ARE WORKING
CHECK TO BE SURE THE RED LIGHT COMES ON FOR HIGH LEVEL IN THE POWER
     HOUSE AND ON THE CONTROL POST.
RESET THE THE CONTROL POST LIGHT.  THIS WILL REQUIRE REMOVING THE COVER.
REFERENCE SKETCH 00-15 IN KEITH'S FILE.
```

ATTACHMENT L

TCLP Analysis

CRYSTAL LABORATORIES

1201 Camden Ave, SW * Canton, Ohio 44706
Phone No: 330-454-4222

Laboratory No. 110412160 **Customer: Canton Drop Forge**
4575 Southway St.
Canton, OH 44706

Date Received: 04/11/11
Date Sampled: 04/11/11
Time Sampled: 14:10
Project Name: Kimble
Identification: #1 Grab Waste Refractory
Sample Matrix: Solid

Analysis	Method	Results	Detection Limits	Date of Analysis
TCLP Arsenic	1311/6010	0.19 mg/L	0.02 mg/L	04/14/11
TCLP Barium	1311/6010	0.50 mg/L	0.02 mg/L	04/14/11
TCLP Cadmium	1311/6010	0.19 mg/L	0.02 mg/L	04/14/11
TCLP Chromium	1311/6010	<0.02 mg/L	0.02 mg/L	04/14/11
TCLP Lead	1311/6010	0.83 mg/L	0.02 mg/L	04/14/11
TCLP Mercury	1311/7471	<0.002 mg/L	0.002 mg/L	04/14/11
TCLP Selenium	1311/6010	0.12 mg/L	0.02 mg/L	04/14/11
TCLP Silver	1311/6010	<0.02 mg/L	0.02 mg/L	04/14/11

Approved By: _____

CRYSTAL LABORATORIES

1201 Camden Ave, SW * Canton, Ohio 44706
Phone No: 330-454-4222

Laboratory No. 110412161 **Customer: Canton Drop Forge**
4575 Southway St.
Canton, OH 44706

Date Received: 04/11/11
Date Sampled: 04/11/11
Time Sampled: 14:15
Project Name: Kimble
Identification: #2 Grab Fly Ash
Sample Matrix: Solid

Analysis	Method	Results	Detection Limits	Date of Analysis
TCLP Arsenic	1311/6010	0.09 mg/L	0.02 mg/L	04/14/11
TCLP Barium	1311/6010	21.6 mg/L	0.02 mg/L	04/14/11
TCLP Cadmium	1311/6010	<0.02 mg/L	0.02 mg/L	04/14/11
TCLP Chromium	1311/6010	0.02 mg/L	0.02 mg/L	04/14/11
TCLP Lead	1311/6010	1.95 mg/L	0.02 mg/L	04/14/11
TCLP Mercury	1311/7471	0.006 mg/L	0.002 mg/L	04/14/11
TCLP Selenium	1311/6010	0.11 mg/L	0.02 mg/L	04/14/11
TCLP Silver	1311/6010	<0.02 mg/L	0.02 mg/L	04/14/11

Approved By: _____

CRYSTAL LABORATORIES

1201 Camden Ave, SW * Canton, Ohio 44706
Phone No: 330-454-4222

Laboratory No. 110412163 **Customer: Canton Drop Forge**
4575 Southway St.
Canton, OH 44706

Date Received: 04/11/11
Date Sampled: 04/11/11
Time Sampled: 14:30
Project Name: Kimble
Identification: #4 Grab Floor Scrappings
Sample Matrix: Solid

Analysis	Method	Results	Detection Limits	Date of Analysis
TCLP Arsenic	1311/6010	<0.02 mg/L	0.02 mg/L	04/14/11
TCLP Barium	1311/6010	5.04 mg/L	0.02 mg/L	04/14/11
TCLP Cadmium	1311/6010	0.25 mg/L	0.02 mg/L	04/14/11
TCLP Chromium	1311/6010	0.33 mg/L	0.02 mg/L	04/14/11
TCLP Lead	1311/6010	0.78 mg/L	0.02 mg/L	04/14/11
TCLP Mercury	1311/7471	<0.002 mg/L	0.002 mg/L	04/14/11
TCLP Selenium	1311/6010	<0.02 mg/L	0.02 mg/L	04/14/11
TCLP Silver	1311/6010	<0.02 mg/L	0.02 mg/L	04/14/11

Approved By: _____

CRYSTAL LABORATORIES

1201 Camden Ave, SW * Canton, Ohio 44706
Phone No: 330-454-4222

Laboratory No. 110412162 **Customer: Canton Drop Forge**
4575 Southway St.
Canton, OH 44706

Date Received: 04/11/11
Date Sampled: 04/11/11
Time Sampled: 14:30
Project Name: Kimble
Identification: #3 Grab Lime Cake
Sample Matrix: Solid

Analysis	Method	Results	Detection Limits	Date of Analysis
TCLP Arsenic	1311/6010	<0.02 mg/L	0.02 mg/L	04/14/11
TCLP Barium	1311/6010	1.90 mg/L	0.02 mg/L	04/14/11
TCLP Cadmium	1311/6010	0.32 mg/L	0.02 mg/L	04/14/11
TCLP Chromium	1311/6010	<0.02 mg/L	0.02 mg/L	04/14/11
TCLP Lead	1311/6010	0.60 mg/L	0.02 mg/L	04/14/11
TCLP Mercury	1311/7471	<0.002 mg/L	0.002 mg/L	04/14/11
TCLP Selenium	1311/6010	0.15 mg/L	0.02 mg/L	04/14/11
TCLP Silver	1311/6010	<0.02 mg/L	0.02 mg/L	04/14/11

Approved By: _____

CHAIN - OF - CUSTODY

Company CANTON DROP FORGE

Facility Name " " "

City CANTON State OHIO

Project Name KIMBLE INFO

Project Contact KEITH HOUSEKNECHT Telephone # 330-477-4511

Client's Representative "

Project Manager "

CRYSTAL LABORATORIES, INC.
1201 CAMDEN AVE. S.W.
CANTON, OHIO 44706
(330) 454-4222

Item #	Sample # or Location	Date	Time	Sample Type	Sample Description	Sets or #'s of Containers	VOC	SVOC	BTEX / MTBE	GRO	DRO	TPH - 1664	RCRA Metals	TCLP Metals	WET CHEM	Other Analysis	Lab ID - #
1	~~WASTE~~ #1	11 APR 2011	1410	GRAB	WASTE REFRACTORY	1								X			[illegible]
2	#2	"	1415	"	FLY ASH	1								X			161
3	#3	"	1430	"	LIME CAKE	1								X			162
4	#4	"	1445	"	FLOOR SCRAPPINGS	1								X			163
5																	
6																	
7																	
8																	
9																	
10																	
11																	
12																	
13																	
14																	
15																	

	Relinquished By	Accepted By	Date	Time
	[signature]	[signature]	4/11/11	3:15 AM

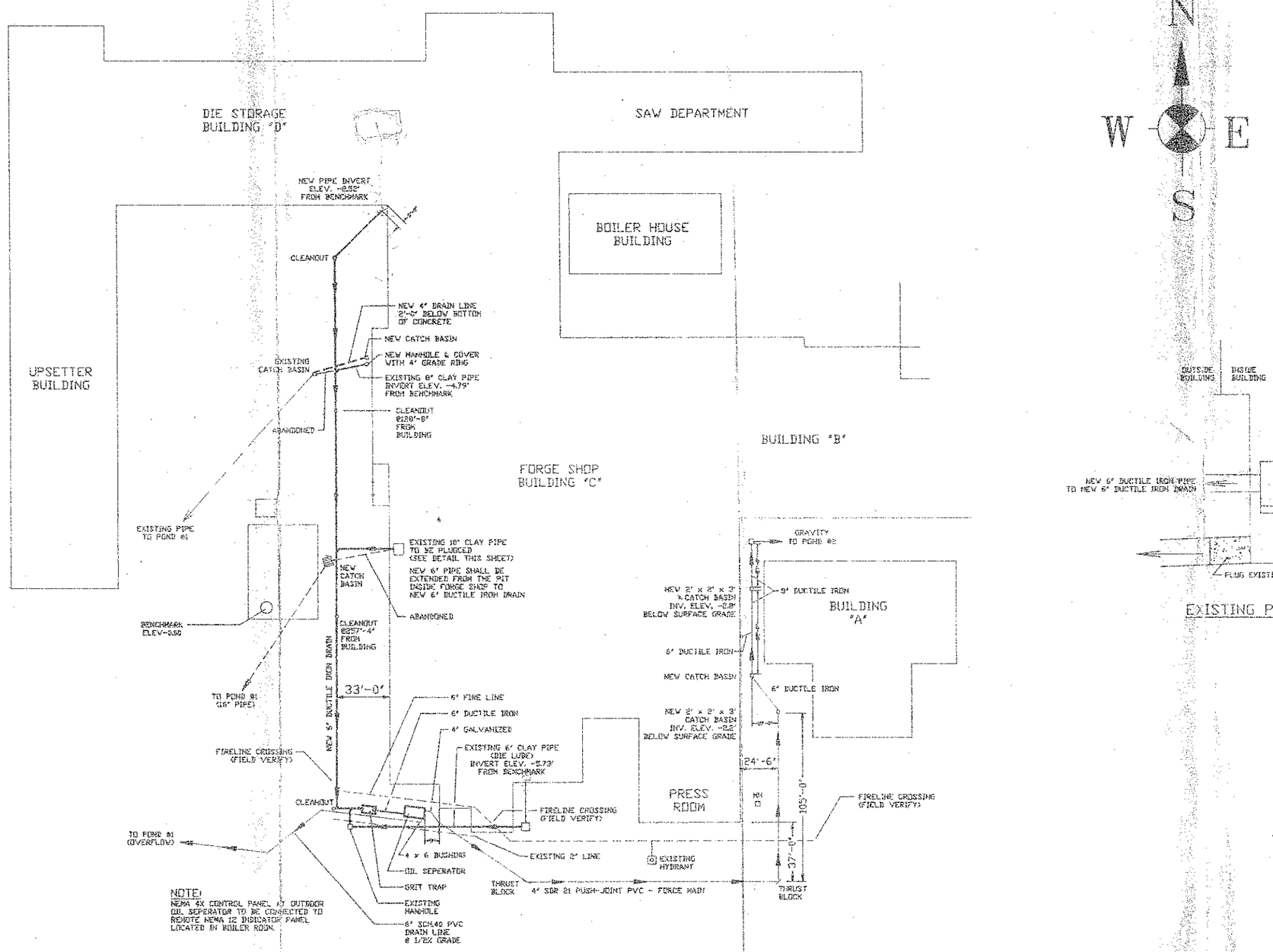
Remarks PO # 11-1429

Temperature

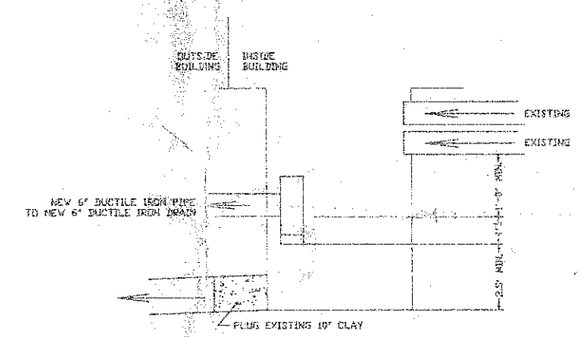
Sampler's Signature:

ATTACHMENT M

Diagrams for Oil Water Separator and Sewers



NOTE:
NEMA 4X CONTROL PANEL AT OUTDOOR OIL SEPERATOR TO BE CONNECTED TO REMOTE NEMA 12 INDICATOR PANEL LOCATED IN BOILER ROOM.



EXISTING PIT IN FORGE SHOP
N.T.S.

THIS DRAWING AND THE SUBJECT MATTER THEREIN CONTAINED ARE THE CONFIDENTIAL PROPERTY OF NORTH COAST ENVIRONMENTAL INC. OF CLEVELAND, OHIO AND ARE TO BE USED ONLY AS AUTHORIZED BY IT IN WRITING. ALL DRAWINGS AND COPIES WILL BE RETURNED UPON REQUEST. THESE CONDITIONS ARE AGREED TO BY THE ACCEPTANCE OF THIS DRAWING OR PRINT.

DATE	REVISION
2/96	AS BUILT

STATE OF OHIO — EARL E. EKLOF — REGISTERED PROFESSIONAL ENGINEER

CANTON DROP FORGE

NEW 6" DRAIN, GRIT TRAP & OIL SEPERATOR PLAN

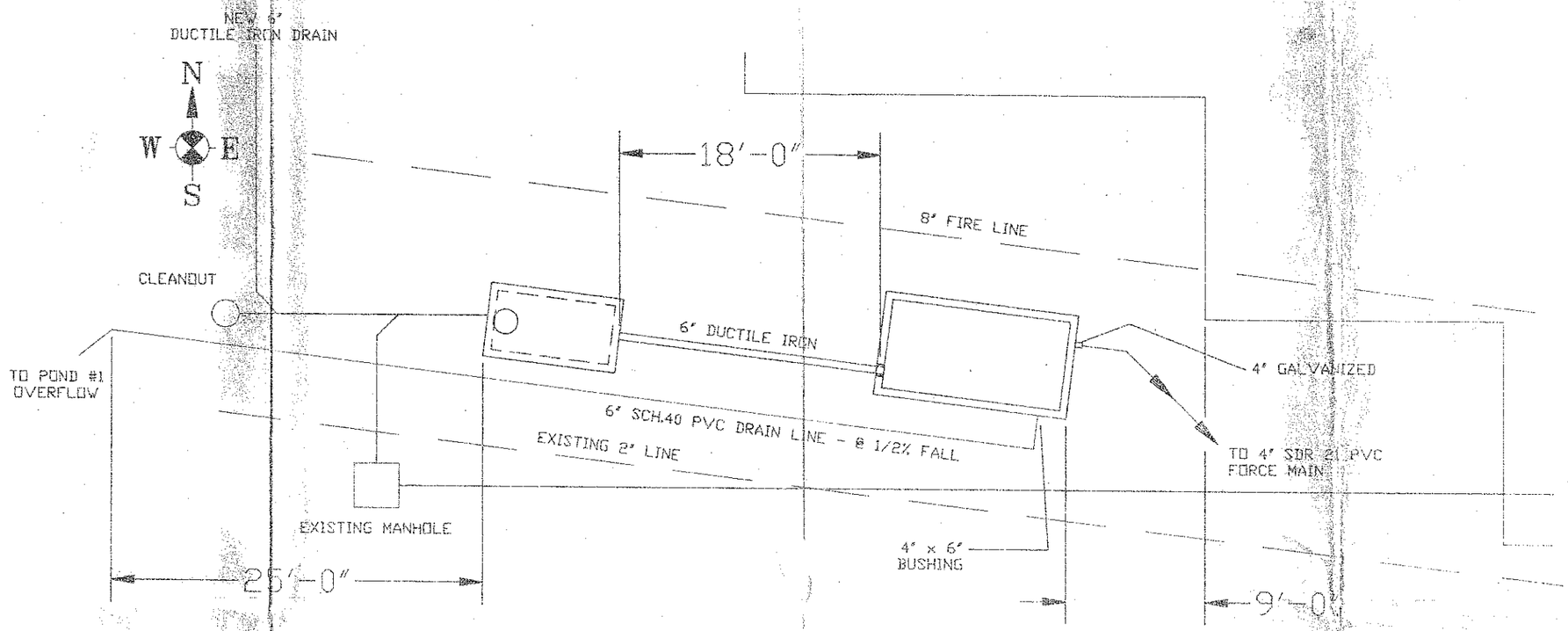
DRAWING TITLE

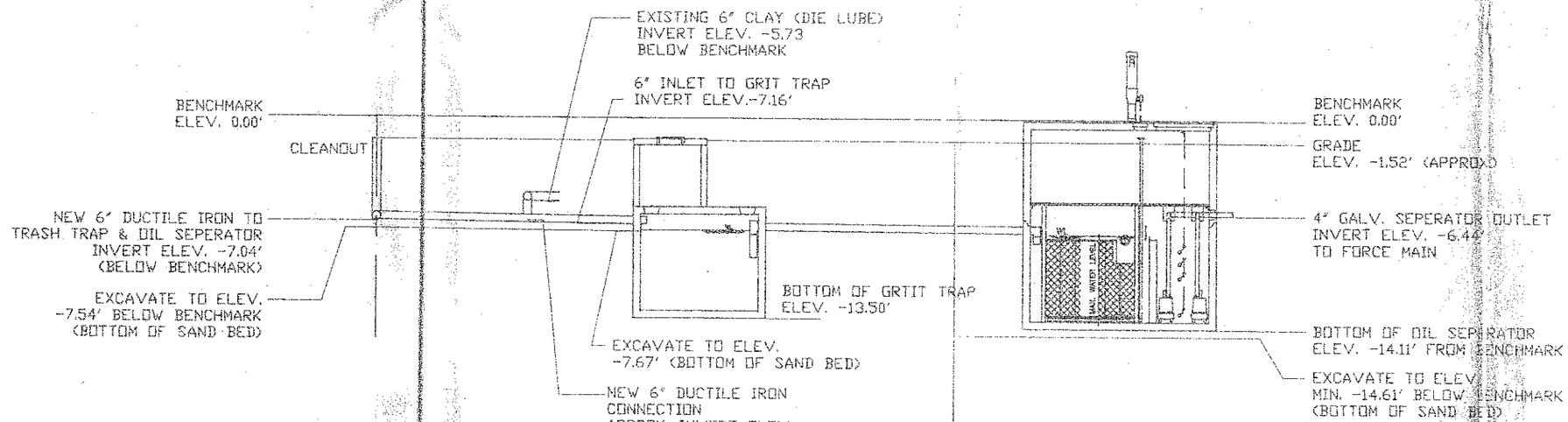
DRAWN BY	DATE	SCALE	DRAWN BY	DATE
EEE	3/14/96	1/32"=1'-0"	R.K.F. II	9/11/95

North Coast Environmental, Inc.
Cleveland, Ohio

SAVE NAME: CDF001X

DRAWING NUMBER: PL-1





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DATE	REVISION
2/96	AS BUILT

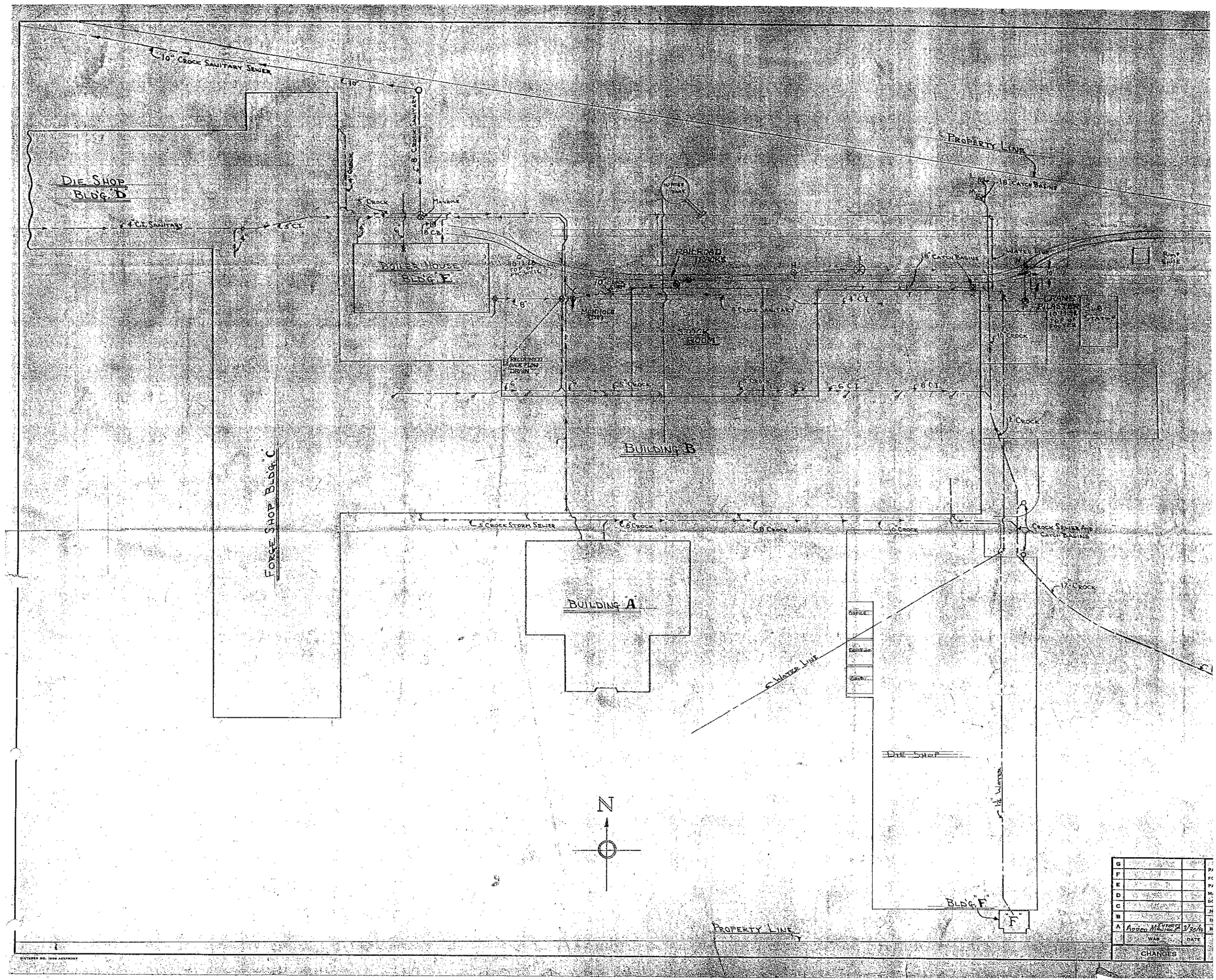
CANTON DROP FORGE

6" DUCTILE IRON DRAIN - OIL SEPERATOR - GRIT TRAP

APPROVED BY	DATE	DRAWING TITLE SCALE	DRAWN BY	DATE
RJF	4/96	1/4"=1'-0"	R.K.F. II	2/96

North Coast Environmental, Inc.
Cleveland, Ohio

SAVE FILE: CDF006X
DRAWING NUMBER: M-1



10" Crock Sanitary Sewer
Property Line
Die Shop Bldg. "D"
4" C.I. Sanitary
5" C.I.
Manhole
Boiler House Bldg. "E"
Railroad Tracks
Stock Room
Manhole
Crane Pilaster
Building "B"
Forge Shop Bldg. "C"
5" Crock Storm Sewer
8" Crock
10" Crock
Crock Sewer and Catch Basins
12" Crock
Building "A"
Water Line
Die Shop
Bldg. "F"
"F"
Property Line
N
G
F
E
D
C
B
A
Added Manhole
3/30/49
WAS
DATE
CHANGES

ATTACHMENT N

August 3, 2012, Shipment Information

Waste Profile

EVERCLEAR

Canton Drop Forge
Generator Name

OHD004465142
EPA I.D.#

4575 Southway St., SW
Facility Street Address

Canton OH 44706
City/State/Zip

Sean Denman 330-477-4511
Contact/Phone

Billing Address (if different):

Complete Waste Disposal
Mailing Address

P.O. Box 1031
Chardon, OH 44024
City/State/Zip

NILS WIDING 440-286-8849
Contact/Phone

Material Description

Material Common Name: assorted oil

Volume/Frequency Generated: yearly

Description of Process Generating Material: Metal Forging

Generator Classification (Check Only One Box Below)

- ☐ [CESQG] Conditionally Exempt Small Quantity Generator 220 lbs. or less per 30 days
- ☒ [SQG] Small Quantity Generator 220-2200 lbs. per 30 days
- ☐ [LQG] Large Quantity Generator 2200 lbs. and over per 30 days

Waste Characterization

Note: Please attach any analytical data you may have on the waste stream being generated.

Is the material considered a RCRA Hazardous Waste?	☐ Yes	☒ No
Is the material considered a TSCA Hazardous Waste?	☐ Yes	☒ No
Does the material contain PCBs?	☐ Yes	☒ No
If yes, what is the concentration of PCBs? _____		
Is the material mixed with a characteristic waste?	☐ Yes	☒ No
Which characteristic waste(s)? _____		
Is halogen content greater than 1000ppm?	☐ Yes	☒ No
If yes, does the used oil contain listed hazardous waste?	☐ Yes	☒ No

All answers to the above questions are based on either analytical data or knowledge of the waste stream and the process generating the waste stream. Based on my knowledge, all information provided is complete and factual and is an accurate representation of the waste stream.

Signature: Sean Denm
Job Title: Director-Safety
Date: 8/2/12
Printed Name: Sean Denman
Company: Canton Drop Forge

APPROVAL INFORMATION — EVERCLEAR USE ONLY

APPROVAL STATUS _____ APPROVAL # _____

AUTHORIZATION _____ DATE _____

Non-Hazardous Waste Manifest

EVERCLEAR

NON-HAZARDOUS WASTE MANIFEST	1. Generator's US EPA ID No.	2. Manifest Document No. 33150
3. Generator's Name and Mailing Address Sean Denman Canton Drop Forge 4575 Southway St SW Canton OH 44706		
4. Generator's Phone (330) 477-4511		
5. Transporter 1 Company Name: Blue Z Transport Inc	6. US EPA ID Number: OHD 000 [illegible]	A. State Transporter's ID
		B. Transporter 1 Phone: 440 [illegible]
7. Transporter 2 Company Name	8. US EPA ID Number	C. State Transporter's ID
		D. Transporter 2 Phone
9. Designated Facility Name and Site Address: EVERCLEAR of Ohio, Ltd. 3700 Oakwood Avenue Austintown, OH 44515	10. US EPA ID Number: OHR000015792	E. State Facility's ID
		F. Facility's Phone: 888-888-3208

11. WASTE DESCRIPTION NOT US DOT REGULATED	12. Containers No.	Type	13. Total Quantity	14. Unit Wt./Vol.
a. Non haz Non DOT Regulated Liquid Oil & water	001	TT	5800	G
b.				
c.				
d.				

G. Additional Descriptions for Materials Listed Above	H. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby certify that the contents of this shipment are fully and accurately described and are in all respects in proper condition for transportation. The materials described on this manifest are not subject to federal hazardous waste regulations.

Printed/Typed Name	Signature	Date Month	Day	Year
Sean Denman	Sean Denman	8	3	12

17. Transporter 1 Acknowledgment of Receipt of Materials

Printed/Typed Name	Signature	Date Month	Day	Year
Gary Tepley	[illegible]	09	03	12

18. Transporter 2 Acknowledgment of Receipt of Materials

Printed/Typed Name	Signature	Date Month	Day	Year

19. Discrepancy Indication Space

20. Facility Owner or Operator; Certification of receipt of the waste materials covered by this manifest, except as noted in item 19.

Printed/Typed Name	Signature	Date Month	Day	Year

PO Box 4058 • 3700 Oakwood Avenue, Austintown, Ohio 44515 • 330.792.2120 • Toll Free 888.888.3208 • Fax 330.792.2432

CONTAINER COMPLIANCE CORPORATION
NOTIFICATION AND DISCLOSURE STATEMENT

CUSTOMER: Complete Waste Disposal

ADDRESS: 4575 Southway St SW

CITY: Canton Ch

STATE ZIP

NUMBER OF DRUMS: _____ CUSTOMER LOAD & COUNT (Y/N): _____

THE CUSTOMER, BY AND THROUGH IT'S DULY AUTHORIZED OFFICER, EMPLOYEE OR AGENT, AS PART OF THE CONSIDERATION FOR CONTAINER COMPLIANCE CORPORATION ACCEPTING ITS' DRUMS ACKNOWLEDGES AND DISCLOSES THE FOLLOWING:

1). ALL CLOSED HEAD DRUMS WILL HAVE ALL CLOSURES IN PLACE AND TIGHT. ALL EMPTY OPEN HEAD DRUMS WILL BE RETURNED AS IF FULL, COVER AND RING IN PLACE AND TIGHTENED, ALL CLOSURES IN PLACE AND TIGHT, AND COMPLY TOTALLY WITH THE U.S. DEPT. OF TRANSPORTATION 49 CFR 173.29.*

2). ALL DRUMS ARE "EMPTY" AS THAT TERM IS DEFINED IN THE NATIONAL ENVIRONMENTAL PROTECTION AGENCY REGULATION, 40 CFR 261.7**, AND HAVE NOT CONTAINED "ACUTELY HAZARDOUS WASTE" AS LISTED IN 40 CFR 261.33(e)***, AND THAT ALL "RQ" MARKINGS APPLY ONLY TO THE ORIGINAL FILLED CONTAINER AND NOT TO THESE EMPTY CONTAINERS AS DEFINED IN 40 CFR 261.7.

3). CUSTOMER HEREBY AUTHORIZES CONTAINER COMPLIANCE CORPORATION TO ACT AS ITS AGENT, WHERE APPLICABLE, WITH RESPECT TO THE RETURN OF DRUMS NOT MEETING THE REQUIREMENTS OF "EMPTY" AS DEFINED IN 40 CFR 261.7 AND AGREES TO PAY ALL REASONABLE FEES AS MAY BE ASSOCIATED WITH THE RETURN OF "HEAVY" DRUMS.

* DOT'S 49 CFR 173.29 SAYS THAT ALL OPENINGS ON THE EMPTY CONTAINER MUST BE CLOSED, AND THAT ALL MARKINGS AND LABELS MUST BE IN PLACE AS IF THE DRUM WERE FULL OF ITS ORIGINAL CONTENTS. A DOT SHIPPING PAPER IS NOT REQUIRED FOR TRANSPORTATION OF A DRUM FOR RECONDITIONING VIA CONTRACT OR PRIVATE MOTOR CARRIER. DOT PLACARDING IS NOT REQUIRED FOR VEHICLES CARRYING EMPTY CONTAINERS. -

** WITH REGARDS TO THE TERM "EMPTY", EPA'S 40 CFR 261.7 SAYS:
"A CONTAINER . . . . . IS EMPTY IF:

(i) ALL WASTES HAVE BEEN REMOVED THAT CAN BE REMOVED USING THE PRACTICES COMMONLY EMPLOYED TO REMOVE MATERIALS FROM THAT TYPE OF CONTAINER, e.g., POURING, PUMPING AND ASPIRATING, AND

(ii) NO MORE THAN 2.5 CENTIMETERS (0NE INCH) OF RESIDUE REMAIN ON THE BOTTOM OF THE CONTAINER, OR 3% BY WEIGHT OF TOTAL CONTAINER..."

THE EPA HAS EXPLAINED THIS RULE, SAYING THAT "ONE INCH OF WASTE MATERIAL IS AN OVERRIDING CONSTRAINT AND MAY REMAIN IN AN EMPTY CONTAINER ONLY IF IT CANNOT BE REMOVED BY NORMAL MEANS. THE RATIONALE FOR THIS PROVISION IS THAT THERE ARE CERTAIN TARS AND EXTREMELY VISCOUS MATERIALS THAT WILL REMAIN IN THE CONTAINER EVEN AFTER THE CONTAINER IS EMPTIED BY NORMAL MEANS."

Sean Denn

*** FOR RESIDUES OF PRODUCTS SPECIFICALLY LISTED BY NAME IN 40 CFR 261.33(e), EPA SAYS THE CONTAINER IS EMTPY ONLY "IF THE CONTAINER . . . HAS BEEN TRIPLE RINSED USING A SOLVENT CAPABLE OF REMOVING" THE PRODUCT, OR HAS BEEN CLEANED BY ANOTHER METHOD SHOWN TO ACHIEVE EQUIVALENT REMOVAL.

WITNESS: BY: Sean Denn

CCC DRIVER: [illegible] TITLE: Director - Safety

TRAILER NO.: 5669 DATE: 5-3-12

MEMBER RIPA

CONTAINER COMPLIANCE CORP.

5151 DENISON AVENUE
CLEVELAND, OH 44102

RECEIVING ORDER

DATE PRINTED	RECEIVER #
8/3/2012	35613

CUSTOMER NAME & BILLING ADDRESS
COMPLETE WASTE DISPOSAL COMPANY NILS WIDING P.O. BOX 1031 Chardon, Ohio 44024

SHIP TO:
ADDRESS: **4575 SOUTHWAY ST. SW**
CITY: **CANTON 44706**
CONTACT: **SEAN**
PHONE: **330-477-4511**

SHIP DATE	P.O. #	BLANKET P.O. #	P/U TRAILER #	D/O TRAILER #	DRIVER NAME
8/3/2012			8669		[illegible]

ITEM	DESCRIPTION	QUANTITY*
SSP	55 GALLON RCRA EMPTY SCRAP STEEL OR POLYS TO BE RECYCLED SUBJECT TO COUNT	132 STEEL 2 POLY

* Quantities are subject to final count by Container Compliance Corp.

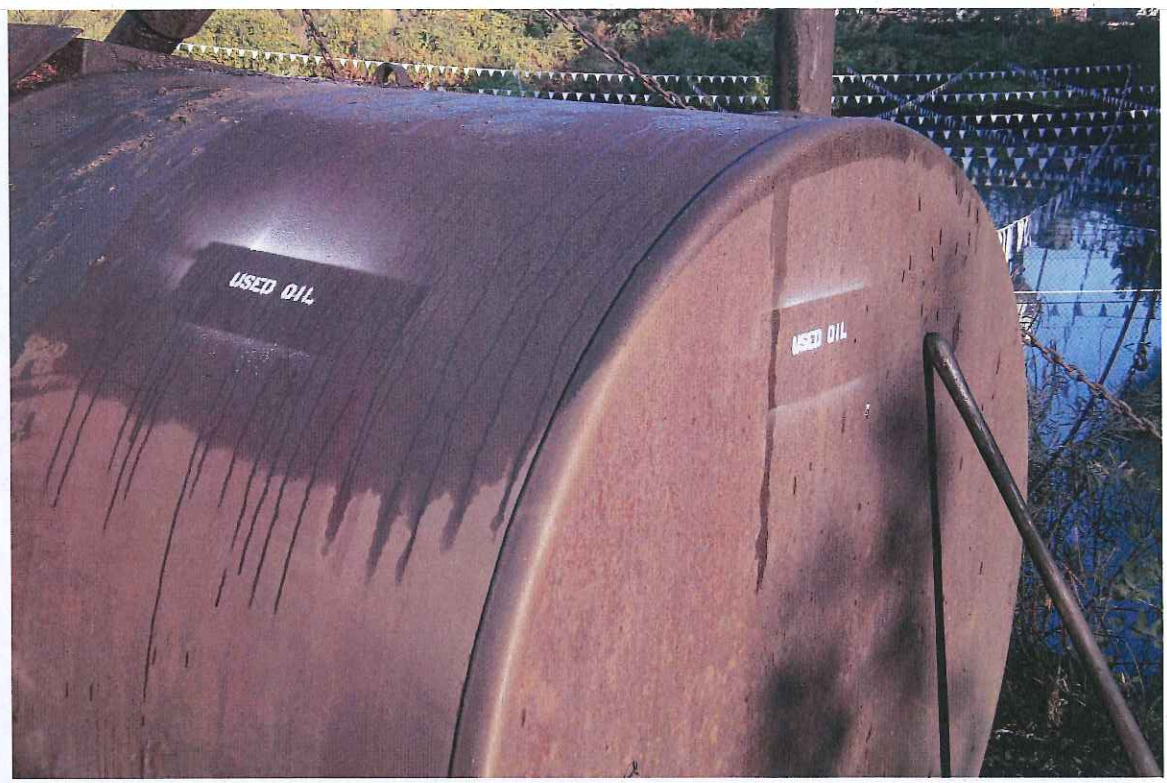
To contact Container Compliance Corp. call 216-961-0035 / Toll-Free 1-800-773-1310

Please make sure to fill out Disclosure form upon pickup for the protection of the generator and disposer.

CUSTOMER ACKNOWLEDGEMENT: _____

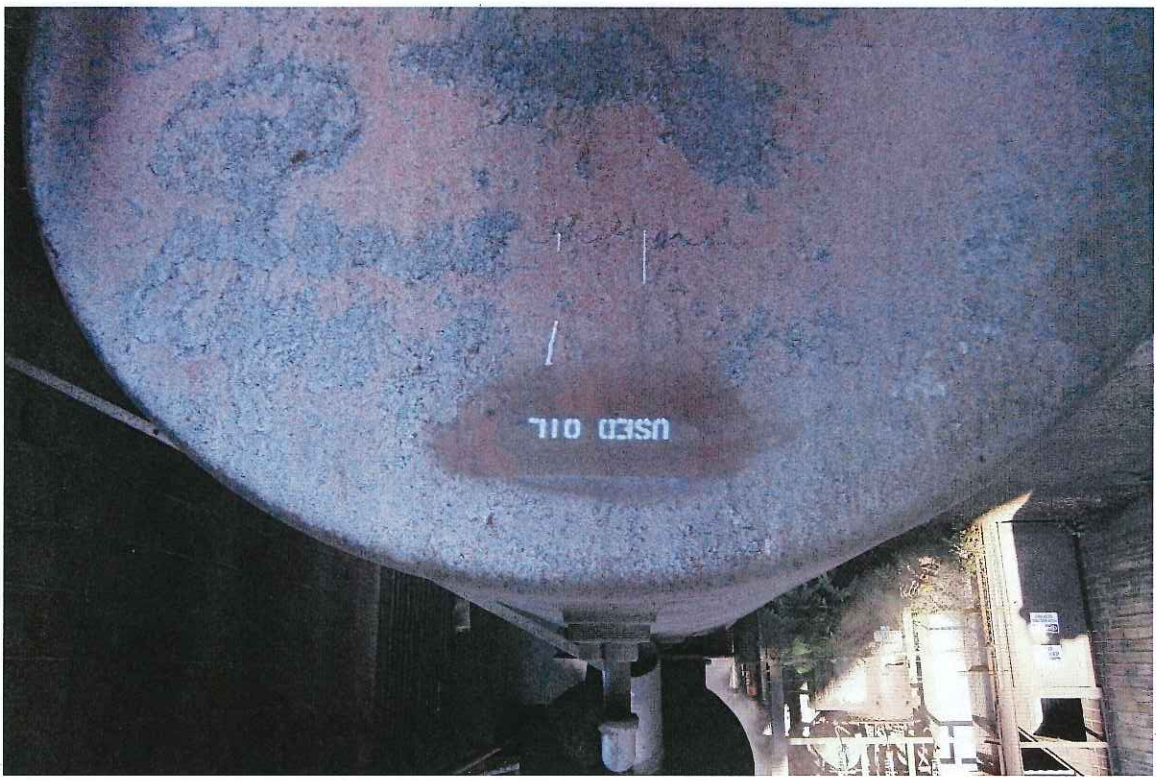
ATTACHMENT O

Marked Tanks Photographs


USED OIL
USED OIL

USED OIL

USED OIL


USED OIL

ATTACHMENT P

Pond 1 Documents

PARSONS ENGINEERING SCIENCE, INC.
A UNIT OF PARSONS INFRASTRUCTURE & TECHNOLOGY GROUP INC

10101 Villaview Road, Suite 301 • Cleveland, Ohio 44119 • (216) 486-9005 • Fax (216) 486-0119
PARESCL/597/Dee/EJK7-7

15 May 1997

Mr. Keith Houseknecht
CANTON DROP FORGE, INC.
4575 Southway Street
Canton, Ohio 44706

Reference: Canton Drop Forge, Inc. Lagoon #1 Re-construction and Biocell Disposal

Dear Mr. Houseknecht:

In accordance with our Scope of Work for the above-referenced project, Parsons Engineering Science, Inc. (Parsons ES) respectfully submits to Canton Drop Forge, Inc. (CDF) our report of progress completed to-date. In particular, the enclosed report summarizes the results of environmental and geotechnical analyses completed, feasibility analyses of several alternative approaches considered, and the conceptual design, budgetary cost estimate and preliminary schedule for implementing the recommended option for addressing these issues.

It is intended that the accompanying draft report will be reviewed with CDF engineering, management and legal staff during our meeting scheduled for Friday, 16 May 1997. After this meeting, Parsons ES will revise the report, as appropriate, reflecting the comments received in a final version of the report within two weeks of the meeting.

We look forward to providing continued environmental and process engineering support to Canton Drop Forge in this and other matters under consideration. Please contact either Mr. Gordon Melle or me at (216) 486-9005 for questions or additional information regarding this effort.

Very truly yours,

PARSONS ENGINEERING SCIENCE, INC.

Edward J Karkalik

Edward J. Karkalik, PE
Project Manager

EJK/dee
cc: File 73139701000

PARSONS

DRAFT

CANTON DROP FORGE, INC.
LAGOON #1 RE-CONSTRUCTION/BIOCELL DISPOSAL
SUMMARY REPORT OF FEASIBILITY ANALYSES

Based on our Scope of Work for the entitled project, Parsons Engineering Science, Inc. (Parsons ES) respectfully submits to Canton Drop Forge, Inc. (CDF) this report. In the sections which follow, we summarize the results of the environmental and geotechnical analyses completed, the feasibility of several alternative approaches considered, and the conceptual design, budgetary cost estimate and preliminary schedule for implementing the recommended option for addressing the re-construction of Lagoon #1 and disposition of the biocell material.

SUMMARY OF CURRENT CONDITIONS

Sampling and Analysis Plan

Prior to sampling, a square grid pattern was lain over a copy of the map of the area which contained the material removed from Lagoon #1, i.e., the biocell (see Figure 1). The area of each grid section was 900 square feet (30 feet by 30 feet). A discrete number was given to each of the grid intersections (there are 77 intersection). A random number generator was then used to pick ten (10) grid intersection points which were then sampled in the field and submitted for analytical/environmental analysis. The samples were labeled CDF-1 through CDF-10. In addition, seven discrete sampling locations inside various grids were sampled and composited for geotechnical analysis. The sampling locations were labeled Geotech-1 through Geotech-7.

Samples which were obtained for analytical/environmental analyses were collected via hand at each selected sampling grid location. Samples were collected from approximately 0.5 feet below grade at each sample location. Sample material was placed directly into laboratory grade jars, sealed with screw-on Teflon-lined lids, place on ice in a cooler and transported to the laboratory. The samples were transported under chain-of-custody procedures to GeoAnalytical, Inc. laboratories in Twinsburg, Ohio for environmental and chemical analyses. Soil samples were analyzed following the Voluntary Action Program (VAP) protocol for total petroleum hydrocarbons, middle range organics (TPH-MRO, EPA method SW846-4015A (modified)), total petroleum hydrocarbons heavy range organics (TPH-HRO, EPA method SW846-4015A (modified)), TPH (EPA method 418.1), and semi-volatile organic compounds (SVOCs, EPA method SW846-8270B). Table 1 summarizes the analytical methods used for this effort.

The soil sample obtained for geotechnical analyses represented a composite of seven sampling locations (e.g., Geotech-1 through Geotech-7). Samples were collected from approximately 0.5 feet below grade at each sample location and placed in a 5-gallon bucket with a sealed lid. The sample material was transported to Applied Construction Technologies, Inc. (ACT) in Cleveland, Ohio for analysis and treatability testing. The composited sample material was mixed with varying amounts of lime and fly ash and subjected to the California Bearing Ratio test (ASTM D1883) to determine the resulting materials' relative bearing capacities. Four test runs were made, one each for the following soil, lime and fly ash mixtures:

- Biocell material with no lime and no fly ash;
- Biocell material with 2% lime and 10% fly ash;
- Biocell material with 6% lime and 22.5% fly ash; and
- Biocell material with 10% lime and 35% fly ash.

Results of Analyses

Table 2 presents the results of analytical and environmental testing for the soil samples collected for chemical analysis. Table 2 only summarizes compounds which were detected during analysis. The complete analytical reports received from GeoAnalytical, Inc. have been included as Appendix A. Please note that the "VAP Limits for Industrial Use Properties" displayed in Table 2 may only be used if the biocell material is deposited between two confining clay layers with vertical hydraulic conductivity of less than 10^{-5} cm/sec. If the biocell materials are enplaced in any other configuration, more conservative VAP limits will apply. It should also be noted that the oily nature of the sampled material caused matrix interference in the laboratory, producing elevated detection limits for SVOCs.

Results of geotechnical analyses and treatability testing are summarized in the table contained in Appendix B. These indicate that, for the soil, lime and fly ash mixtures tested, the second case (i.e., with 2% lime and 10% fly ash) produced the most desirable results. Please note that this mixture is not necessarily the ***optimal*** result; subsequent discussions with the laboratory have indicated that slightly lower additions of lime and fly ash may produce a mixture with an adequate bearing capacity.

Implications of Analytical Results

Implications of the environmental and chemical analytical results are such that the material contained in the biocell should be suitable for application following the guidance of the VAP regulations. There are no compounds, which are required to be analyzed under VAP, with values exceeding the limits provided in VAP's Generic Numerical Standards for industrial use properties [OAC 3745-300-08]. To apply these limits, CDF must agree to maintain this property in industrial use in perpetuity. Also, in the future, should CDF decide to obtain closure of this property (or the portion being addressed in this project), the entire VAP protocol must be completed, resulting in issuance of a No Further Action (NFA) Letter by a Certified Professional and, if desired, a Covenant Not To Sue (CNS) by Ohio EPA.

Implications of the geotechnical analytical and treatability testing results are that, in order to maintain structural integrity in future applications (see specifically options b, c, and f below), stabilization with lime and fly ash is required. Please note that the long-term effects of certain applications, i.e., specifically as wearing surfaces in track or roadway and parking applications, have not been tested and are difficult to predict. For example, CDF should be aware that exposure to traffic and the elements (e.g., sunlight, precipitation, etc.) may result in physical or chemical changes in the stabilized soil mixture, resulting in potentially undesirable effects.

RCRA characterization testing (previously completed by Hammontree & Associates, prior to removal of the biocell material from Lagoon #1) indicated that the material was non-hazardous. Hence, the options presented below are considered feasible without the need for pretreatment for environmental risk reduction (i.e., fixation to prevent leaching should not be required).

FEASIBILITY ANALYSES

FOIA Review for VAP Applicability

Based on information from Mr. Richard Zollinger, Esq. of CDF, the Freedom of Information Act (FOIA) searches conducted at Twinsburg (Ohio EPA, Northeast Ohio District), Columbus (Ohio EPA, Headquarters) and Chicago (US EPA, Region V) produced no information that would prohibit use of a VAP approach for disposition of biocell material and/or re-construction of Lagoon #1. Consequently, based on the results of the FOIA searches and the

environmental sampling and analyses summarized above, it has been determined that application of the VAP regulatory framework should provide guidance, which is acceptable to the major stakeholders (i.e., Ohio EPA, CDF), for this project.

Further review of CDF's operating and regulatory history has indicated that, at one time or another (but not necessarily currently), other regulatory frameworks may have been applicable. For instance, the underground storage tanks (USTs), at least one (of three) has since been removed, are operated under the jurisdiction of the Bureau of Underground Storage Tank Regulations (BUSTR). Also, the landfill, which was located in the vicinity of the biocell and has since been closed, was possibly regulated under the Resource Conservation and Recovery Act (RCRA). Additionally, the Ohio EPA's Master Sites List (MSL) includes the CDF property (EPA ID no. OHD004465142) as a "low priority" site, included in the MSL since 1985 due to an "oily wastes" problem. In any case, even with these additional regulatory considerations in the background, it appears reasonable to follow VAP guidance for the current project. It should be noted, however, that several additional steps, i.e., Phase I property assessment, NFA Letter, etc., are required before the Lagoon #1 and biocell areas of the CDF property can be considered "closed" under VAP guidance. In other words, completion of these actions will not result in a regulatory closure of this portion of the CDF property. These proposed actions have been developed consistent with the requirements of VAP, should CDF choose to seek closure in the future.

Alternative Approaches

In view of the potentially appropriate alternatives for the disposal of material contained in the biocell and concurrent re-construction of Lagoon #1, Parsons ES has considered the following approaches:

a) transportation to and disposal of the biocell material in an appropriately licensed off-site landfill;

b) stabilization, as described above for structural integrity, and deposition in an on-site area, which will later be re-surfaced with asphalt for parking;

c) stabilization, as described above for structural integrity, and deposition in an on-site area, which will be used as a track or roadway around the inside perimeter of the property;

d) transportation and sale to Ashland's Refinery in Canton for use as a feed-stock;

e) transportation and sale to a local asphalt plant for use as a feed-stock; and

f) stabilization, as described above for structural integrity, and deposition in an appropriate manner (see following section) in Lagoon #1 as part of the back-fill required to reduce the pond's capacity to that required for storm water management.

It should be noted that, in re-constructing Lagoon #1 for alternatives a, b, c, d, and e above, additional volumes of clean fill material (beyond that which may be required for option f), will be required in lieu of the volume of biocell material which is being used or disposed elsewhere and of the clay used to provide a lining under the layer of biocell material (enplaced in option f). Also, in all cases, a small, incremental volume of oil-impacted soil and water in Lagoon #1 must be removed prior to initiating any re-construction activities. Parsons ES proposes that, subject to CDF approval and subsequent to recovery of any free oil, the additional oily soil and water be transferred to the biocell and Lagoon #2, respectively. Finally, except for the nature of an internal layer of biocell material (as in option f), the emplacement sequence for re-construction of Lagoon #1 would be similar for all options listed above:

- clay layer;
- biocell material (option f only);

- clay layer (option f only);
- HDPE liner (optional, if required); and
- stabilization layer (optional, if required).

Please note that for options a through e, clean fill may be substituted for the lower clay layer indicated above.

Screening Criteria

As indicated in our Scope of Work, the following criteria were used to screen the alternatives listed previously: economic impact (i.e., overall costs); scheduling impact; technical feasibility (i.e., implementability); stakeholder (i.e., regulatory agency, customer, neighbor, stockholder) acceptability; and permitting requirements. Table 3 provides a summary of the screening criteria definitions (see footnotes). Additional details concerning the definitions of the screening criteria and their application are contained in Appendix C.

Results of Screening

After applying the screening criteria to the alternative approaches considered, Parsons ES identified a recommended option for further analysis. Table 3 provides the results of the alternatives screening exercise. The **recommended option**, as a result of the screening effort, is option f, the stabilization and transfer of biocell material for use in re-construction of Lagoon #1. This option is preferred because it is:

- cost-effective (minimizing costs of transporting soil in comparison to options a, d and e, which involve off-site shipment of biocell material and hauling of an equivalent volume of clean fill from off-site to the CDF property);
- time-efficient (reducing risks of scheduling impacts potentially caused by others, as in options a, d and e);
- technically feasible (e.g., and readily implementable, in comparison with options b, c, d and e, for which ease of implementation is either uncertain or perceived to be more difficult);
- acceptable to the primary stakeholders (e.g., the risk takers, including regulatory agencies and CDF, in comparison with options a, d and e for which future control cannot be assured); and
- low risk with respect to permitting (in comparison with options a, c and d, which may require "permits" for off-site transportation of the biocell material).

A conceptual description, cost estimate and preliminary schedule for this option are provided in the following section. Please note that, for the sake of comparison only, costing and scheduling information were developed and are provided for the off-site landfill disposal option. The off-site landfill disposal option is being used as the "base case" in this comparison with the preferred option.

RECOMMENDED OPTION

Conceptual Design

The conceptual design for the preferred option includes implementation of the following steps. Figure 2 provides a profile view of the resulting conceptual design. To implement this design, we recommend that CDF plan to:

- remove any residual oily soil which remains in Lagoon #1 and transfer it to the biocell;
- re-grade Lagoon #1, as necessary, to assure that the side-walls are stable;
- place and compact a 12-inch layer of clay, in two 6-inch lifts, to provide an impermeable lining in the Lagoon #1 excavation;
- in the biocell, add and mix 2% lime and 10% fly ash with the oily soil to stabilize it;
- transfer the stabilized mixture from the biocell to Lagoon #1;
- place and compact the stabilized biocell material in Lagoon #1; and
- place and compact one additional 6-inch layer of clay to cap and seal the surface of Lagoon #1.

Depending on the final size of Lagoon #1, excess stabilized biocell material may be available. Drainage and traffic considerations must be taken into account for the possible locations for on-site placement and compaction of this material. Appropriate consideration of these factors will preclude future erosion of this material from the property.

Budgetary Cost Estimate

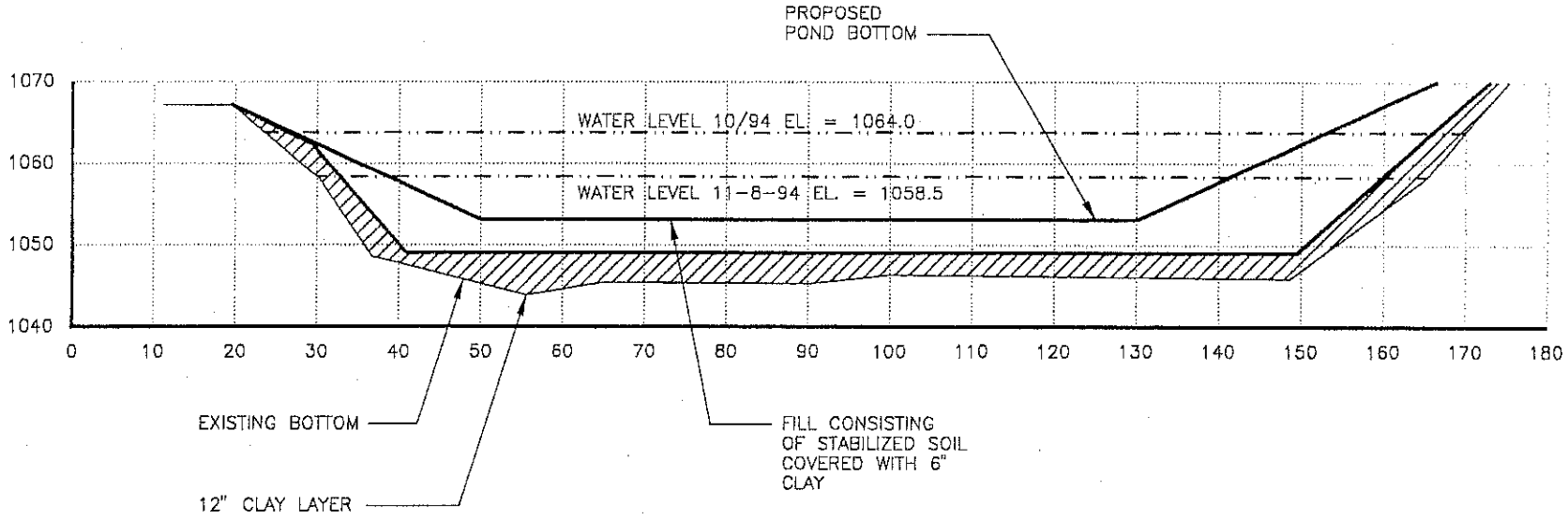
Parsons ES has developed, working in conjunction with Beaver Excavating Company, a budgetary cost estimate (i.e., within +/- 30%) of $150,000 for the recommended option. This estimate is based on the assumptions that:

- about 3000 cubic yards of oily soil are available for stabilization in the biocell; and
- about 600 cubic yards of clay will be required for the upper and lower layers lining the re-constructed Lagoon #1.

Table 4 contains the cost estimate, provided by major cost category.

Preliminary Schedule

It is projected that this recommended option, for re-constructing Lagoon #1 and addressing the disposition of the biocell material concurrently, can be accomplished within 9 to 10 weeks after CDF's issuance of an order to proceed. In particular, the final design for Lagoon #1 can be completed within 3-4 weeks. The construction phase of the project is anticipated to require about six (6) weeks.



LAGOON CROSS SECTION

FIGURE 2

PARSONS ENGINEERING SCIENCE, INC.

731397.01000

31397C02

TABLE 1

ANALYTICAL PROCEDURES - SOIL
CANTON DROP FORGE
4575 SOUTHWAY STREET
CANTON, OHIO

18 April 1997

Analyte	Method
Total Petroleum Hydrocarbons - Middle Range Organics	EPA Method SW846-8015A (modified)
Total Petroleum Hydrocarbons - Heavy Range Organics	EPA Method SW846-8015A (modified)
Total Petroleum Hydrocarbons	EPA Method 418.1
Semi-Volatile Organic Compounds	EPA Method SW846-8270B

TABLE 2

RESULTS OF LABORATORY ANALYSIS - SOIL
CANTON DROP FORGE
4575 SOUTHWAY STREET
CANTON, OHIO

18 April 1997

Sample ID	Middle Range Organics (ppm)	Heavy Range Organics (ppm)	TPH-418.1 (ppm)	Pyrene (ppm)	Chrysene (ppm)
CDF-1	19.0	671	36,900	<20	<20
CDF-2	42.3	893	46,900	<20	<20
CDF-3	94.8	1,620	92,600	<20	<20
CDF-4	59.4	593	72,700	<20	<20
CDF-5	118	1,090	104,000	<20	<20
CDF-6	101	1,080	89,600	<20	<20
CDF-7	101	1,170	93,800	25.2	22.5
CDF-8	147	1,270	95,000	20.5	25.8
CDF-9	196	1,100	135,000	22.5	22.1
CDF-10	32.6	580	57,200	<20	<20
VAP Limits for Industrial Use Properties	20,000	40,000	NA	8,900	3,100

NA - Not applicable.

TABLE 3
CANTON DROP FORGE, INC. PLANT, CANTON, OHIO
LAGOON #1 RE-CONSTRUCTION / BIOCELL DISPOSITION OPTIONS

Indicator	Description of Options	Subjective Evaluation (1-5, with 5= best)					
		Objective Economic Impact[1]	Objective Scheduling Impact[2]	Subjective Technical Feasibility[3]	Subjective Stakeholder Acceptance[4]	Subjective Permitting Req'ments[5]	Overall Rating
A	Disposal in off-site landfill[6]	1 (3)	4	4	3	3	15 (17)
B	Stabilization in on-site parking area[6] (to be covered with asphalt)	2	4	4	3	5	18
C	Stabilization in on-site track or roadway area[6] (not covered)	2	4	3	2	5	16
D	Transport to Ashland's Canton Refinery for feed-stock[6]	3	2	1	3	3	12
E	Transport to asphalt plant for feed-stock[6]	4	2	3	3	3	15
F	Stabilization and use in conjunction with clay layers[6]	3	4	4	4	5	20

see appendix C for criteria

Notes:

1) Economic Impact = 1 for options ≥ $50/tn and = 5 for options ≤ $10/tn.
2) Scheduling Impact = 1 for options ≥ 8 months and = 5 for options ≤ 2 months.
3) Technical Feasibility = 1 for impractical / very difficult options and = 5 for easily implemented options.
4) Stakeholder Acceptance = 1 for options meeting substantial / insurmountable objections and = 5 for fully acceptable options.
5) Permitting Requirements = 1 for substantial / difficult requirements and = 5 for no permits required.
6) Options A-E include transport, placement and compaction of clean fill in Lagoon #1.

TABLE 4

BUDGETARY COST ESTIMATE
CANTON DROP FORGE, INC.
RECONSTRUCTION OF LAGOON #1 AND BIOCELL DISPOSITION

Task Description	Cost Estimate	
Conduct detailed design and construction review	$15,000	
Pump out Lagoon #1	1,000	
Remove oily soil from Lagoon #1	2,000	
Re-grade Lagoon #1	2,000	
Place and compact clay lining in Lagoon #1	10,000	
Stabilize oily soil material in the biocell	75,000	— $40/yd³
Place and compact stabilized soil in Lagoon #1	30,000	
Place and compact final clay layer	5,000	
General conditions	10,000	
TOTAL	$150,000	100,000/200,000

Option A = $151,000 estimate.
firm bid on moving & disposing of material = ± 15%

APPENDIX A:

RESULTS OF ENVIRONMENTAL ANALYSES FROM GEOANALYTICAL, INC.

FOR

CANTON DROP FORGE, INC.
CANTON, OHIO

APRIL/MAY 1997

G E O A n a l y t i c a l , I n c .

Report Issued To: Parsons Engineering Science
19101 Villaview Road, Suite 300
Cleveland, Ohio 44119

GEO Job# 9704102(A)
Matrix Type: Soil
Samples Received: 04/22/97
Date Analyzed: 04/25-26/97
Analysis Reported: 04/29/97

Project Number: 731397.01000
Project Name: Canton Drop Forge

NONHALOGENATED VOLATILE ORGANICS IN SOIL

Lab #	Date	Station Location	Middle Range Organics	Heavy Range Organics	Reporting Limit
1995	04/18/97	CDF-1	19.0	671	4.0
1996	04/18/97	CDF-2	42.3	893	4.0
1997	04/18/97	CDF-3	94.8	1,620	4.0
1998	04/18/97	CDF-4	59.4	593	4.0
1999	04/18/97	CDF-5	118	1,090	4.0
2000	04/18/97	CDF-6	101	1,080	4.0
2001	04/18/97	CDF-7	101	1,170	4.0
2002	04/18/97	CDF-8	147	1,270	4.0
2003	04/18/97	CDF-9	196	1,100	4.0
2004	04/18/97	CDF-10	32.6	580	4.0
			mg/Kg	mg/Kg	mg/Kg

Analytical Methodology Information

EPA Method SW846-8015A(Modified), "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods"

Middle Range Organics calculated from Heptane (C7) to Hexadecane (C16).

Heavy Range Organics calculated from Hexadecane (C16) to Dotriacontane (C32).

Samples may contain compounds with higher molecular weights than Dotriacontane (C32) which are not calculated in the Total Petroleum Hydrocarbons number reported.

These petroleum fractions are found in Rule 3746 of the OAC Section 3745-300-08 of the Generic Numeric Standards.

Initial Calibration Date: 05/20/96-01/09/97
Continuing Calibration Date: 04/25-26/97
Analyst: M. Darsot - C. Lang

ANALYSIS REVIEWED AND APPROVED BY Christa Thaxton

G E O A n a l y t i c a l , I n c

Report Issued To: Parsons Engineering Science
19101 Villaview Road, Suite 300
Cleveland, Ohio 44119

GEO Job#	9704102(B)	Project Number:	731397.01000
Matrix Type:	Soil		
Samples Received:	04/22/97	Project Name:	Canton Drop Forge
Date Analyzed:	04/25-28/97		
Analysis Reported:	04/29/97		

PETROLEUM HYDROCARBONS, TOTAL RECOVERABLE IN SOIL

Lab #	Date	Station Location	Result	Reporting Limit
1995	04/18/97	CDF-1	36,900	2,000
1996	04/18/97	CDF-2	46,900	4,000
1997	04/18/97	CDF-3	92,600	4,000
1998	04/18/97	CDF-4	72,700	2,000
1999	04/18/97	CDF-5	104,000	4,000
2000	04/18/97	CDF-6	89,600	4,000
2001	04/18/97	CDF-7	93,800	4,000
2002	04/18/97	CDF-8	95,000	4,000
2003	04/18/97	CDF-9	135,000	2,000
2004	04/18/97	CDF-10	57,200	2,000
			mg/Kg	mg/Kg

Analytical Methodology Information

EPA Method 418.1, "Methods for Chemical Analysis of Water and Wastes"

Initial Calibration Date: 04/25-28/97
Continuing Calibration Date: 04/25-28/97
Analyst: J. Woodall

ANALYSIS REVIEWED AND APPROVED BY Christa Pharm

G E O A n a l y t i c a l, I n c

Report Issued To: Parsons Engineering Science
19101 Villaview Road, Suite 300
Cleveland, Ohio 44119

GEO Job#	9704102(M)-2005	Project Number:	731397.01000
Matrix Type:	Water		
Samples Received:	04/22/97	Project Name:	Canton Drop Forge
Date Analyzed:	04/23/97		
Analysis Reported:	04/24/97		

Sample Date: 04/18/97
Sample Description: Trip Blank

GAS CHROMATOGRAPHY/MASS SPECTROMETRY FOR SEMI-VOLATILE ORGANICS IN WATER

COMPOUNDS	RESULTS	REPORTING LIMIT
N-Nitrosodimethylamine	< 25.0	25.0
Phenol	< 5.0	5.0
2-Chlorophenol	< 5.0	5.0
bis(2-Chloroethyl)ether	< 5.0	5.0
1,3-Dichlorobenzene	< 5.0	5.0
1,4-Dichlorobenzene	< 5.0	5.0
1,2-Dichlorobenzene	< 5.0	5.0
2-Methylphenol	< 5.0	5.0
bis(2-Chloroisopropyl)ether	< 5.0	5.0
4-Methylphenol	< 5.0	5.0
Hexachloroethane	< 5.0	5.0
N-Nitroso-di-n-propylamine	< 25.0	25.0
Nitrobenzene	< 5.0	5.0
Isophorone	< 5.0	5.0
2-Nitrophenol	< 5.0	5.0
2,4-Dimethylphenol	< 5.0	5.0
bis(2-Chloroethoxy)methane	< 5.0	5.0
2,4-Dichlorophenol	< 5.0	5.0
1,2,4-Trichlorobenzene	< 5.0	5.0
Naphthalene	< 5.0	5.0
4-Chloroanaline	< 5.0	5.0
Hexachlorobutadiene	< 5.0	5.0
4-Chloro-3-methylphenol	< 5.0	5.0
2-Methylnaphthalene	< 5.0	5.0
Hexachlorocyclopentadiene	< 5.0	5.0
2,4,5-Trichlorophenol	< 5.0	5.0
2,4,6-Trichlorophenol	< 5.0	5.0
2-Chloronaphthalene	< 5.0	5.0
2-Nitroanaline	< 5.0	5.0
Acenaphthylene	< 5.0	5.0
Dimethyl phthalate	< 5.0	5.0
2,6-Dinitrotoluene	< 5.0	5.0
3-Nitroanaline	< 5.0	5.0
Acenaphthene	< 5.0	5.0
2,4-Dinitrophenol	< 25.0	25.0
4-Nitrophenol	< 5.0	5.0
Dibenzofuran	< 5.0	5.0
2,4-Dinitrotoluene	< 5.0	5.0
	ug/L	ug/L

G E O A n a l y t i c a l I n c

GEO Job# :9704102(M)-2005
Page 2 of 2

COMPOUNDS	RESULTS	REPORTING LIMIT
Diethyl phthalate	< 5.0	5.0
Fluorene	< 5.0	5.0
4-Chlorophenylphenyl ether	< 5.0	5.0
4-Nitroanaline	< 5.0	5.0
2-Methyl-4,6-dinitrophenol	< 25.0	25.0
N-Nitrosodiphenylamine	< 5.0	5.0
4-Bromphenylphenyl ether	< 5.0	5.0
Hexachlorobenzene	< 5.0	5.0
Pentachlorophenol	< 5.0	5.0
Phenanthrene	< 5.0	5.0
Anthracene	< 5.0	5.0
Carbazole	< 5.0	5.0
Di-n-butyl phthalate	< 5.0	5.0
Fluoranthene	< 5.0	5.0
Pyrene	< 15.0	5.0
Butyl benzyl phthalate	< 5.0	5.0
Benzo(a)anthracene	< 5.0	5.0
3,3'-Dichlorobenzidine	< 25.0	25.0
Chrysene	< 5.0	5.0
bis(2-Ethylhexyl) phthalate	< 5.0	5.0
Di-n-octyl phthalate	< 5.0	5.0
Benzo(b)fluoranthene	< 5.0	5.0
Benzo(k)fluoranthene	< 5.0	5.0
Benzo(a)pyrene	< 2.0	2.0
Indeno(1,2,3-cd)pyrene	< 5.0	5.0
Dibenzo(a,h)anthracene	< 5.0	5.0
Benzo(ghi)perylene	< 5.0	5.0
	ug/L	ug/L

COMPOUND	% SURROGATE RECOVERY	ACCEPTABLE RANGE
2-Fluorophenol	50	35-110
Phenol d5	27	10-110
Nitrobenzene d5	68	35-114
2-Fluorobiphenyl	72	43-116
2,4,6-Tribromophenol	89	10-123
Terphenyl d14	72	33-141

* indicates surrogate recovery outside of acceptable range.

Analytical Methodology Information

EPA Method SW846-8270B, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods"

Initial Calibration Date: 04/17/97
Continuing Calibration Date: 04/23/97
Analyst: T. Lang

ANALYSIS REVIEWED AND APPROVED BY Christa Thaxton

9263 Ravenna Rd. • Suite A-7 • Twinsburg, Ohio 44087 • Phone 216 963 6990 • Fax 216 963 697

G E O . A n a l y t i c a l , I n c

Report Issued To: Parsons Engineering Science
19101 Villaview Road, Suite 300
Cleveland, Ohio 44119

GEO Job# 9704102(C)-1995
Matrix Type: Soil
Samples Received: 04/22/97
Date Analyzed: 04/30-05/02/97
Analysis Reported: 05/06/97

Project Number: 731397.01000
Project Name: Canton Drop Forge

Sample Date: 04/18/97
Sample Description: CDF-1

GAS CHROMATOGRAPHY/MASS SPECTROMETRY FOR SEMI-VOLATILE ORGANICS IN SOIL

COMPOUNDS	RESULTS	REPORTING LIMIT
N-Nitrosodimethylamine	< 100	100
Phenol	< 20.0	20.0
2-Chlorophenol	< 20.0	20.0
bis(2-Chloroethyl)ether	< 20.0	20.0
1,3-Dichlorobenzene	< 20.0	20.0
1,4-Dichlorobenzene	< 20.0	20.0
1,2-Dichlorobenzene	< 20.0	20.0
2-Methylphenol	< 20.0	20.0
bis(2-Chloroisopropyl)ether	< 20.0	20.0
4-Methylphenol	< 20.0	20.0
Hexachloroethane	< 20.0	20.0
N-Nitroso-di-n-propylamine	< 100	100
Nitrobenzene	< 20.0	20.0
Isophorone	< 20.0	20.0
2-Nitrophenol	< 20.0	20.0
2,4-Dimethylphenol	< 20.0	20.0
bis(2-Chloroethoxy)methane	< 20.0	20.0
2,4-Dichlorophenol	< 20.0	20.0
1,2,4-Trichlorobenzene	< 20.0	20.0
Naphthalene	< 20.0	20.0
4-Chloroanaline	< 20.0	20.0
Hexachlorobutadiene	< 20.0	20.0
4-Chloro-3-methylphenol	< 20.0	20.0
2-Methylnaphthalene	< 20.0	20.0
Hexachlorocyclopentadiene	< 20.0	20.0
2,4,5-Trichlorophenol	< 20.0	20.0
2,4,6-Trichlorophenol	< 20.0	20.0
2-Chloronaphthalene	< 20.0	20.0
2-Nitroanaline	< 20.0	20.0
Acenaphthylene	< 20.0	20.0
Dimethyl phthalate	< 20.0	20.0
2,6-Dinitrotoluene	< 20.0	20.0
3-Nitroanaline	< 20.0	20.0
Acenaphthene	< 20.0	20.0
2,4-Dinitrophenol	< 100	100
4-Nitrophenol	< 20.0	20.0
Dibenzofuran	< 20.0	20.0
2,4-Dinitrotoluene	< 20.0	20.0
	mg/Kg	mg/Kg

G E O A n a l y t i c a l, I n c

GEO Job# 9704102(C)-1995
Page 2 of 2

COMPOUNDS	RESULTS	REPORTING LIMIT
Diethyl phthalate	< 20.0	20.0
Fluorene	< 20.0	20.0
4-Chlorophenylphenyl ether	< 20.0	20.0
4-Nitroanaline	< 20.0	20.0
2-Methyl-4,6-dinitrophenol	< 100	100
N-Nitrosodiphenylamine	< 20.0	20.0
4-Bromphenylphenyl ether	< 20.0	20.0
Hexachlorobenzene	< 20.0	20.0
Pentachlorophenol	< 20.0	20.0
Phenanthrene	< 20.0	20.0
Anthracene	< 20.0	20.0
Carbazole	< 20.0	20.0
Di-n-butyl phthalate	< 20.0	20.0
Fluoranthene	< 20.0	20.0
Pyrene	< 20.0	20.0
Butyl benzyl phthalate	< 20.0	20.0
Benzo(a)anthracene	< 20.0	20.0
3,3'-Dichlorobenzidine	< 100	100
Chrysene	< 20.0	20.0
bis(2-Ethylhexyl) phthalate	< 20.0	20.0
Di-n-octyl phthalate	< 20.0	20.0
Benzo(b)fluoranthene	< 20.0	20.0
Benzo(k)fluoranthene	< 20.0	20.0
Benzo(a)pyrene	< 20.0	20.0
Indeno(1,2,3-cd)pyrene	< 20.0	20.0
Dibenzo(a,h)anthracene	< 20.0	20.0
Benzo(ghi)perylene	< 20.0	20.0
	mg/Kg	mg/Kg

COMPOUND	% SURROGATE RECOVERY	ACCEPTABLE RANGE
2-Fluorophenol	91	33 - 144
Phenol d5	78	62 - 120
Nitrobenzene d5	100	80 - 132
2-Fluorobiphenyl	99	67 - 105
2,4,6-Tribromophenol	92	24 - 135
Terphenyl d14	82	49 - 141

* Indicates surrogate recovery outside of acceptable range.

Analytical Methodology Information

EPA Method SW846-8270B, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods"

Initial Calibration Date: 04/17/97-05/01/97
Continuing Calibration Date: 04/30-05/02/97
Analyst: T. Lang

REVIEWED AND APPROVED BY Christie Thaxton

9263 Ravenna Rd. • Suite A-7 • Twinsburg, Ohio 44087 • Phone 216 963 6990 • Fax 216 963 69

G E O A n a l y t i c a l , I n c

Report Issued To: Parsons Engineering Science
19101 Villaview Road, Suite 300
Cleveland, Ohio 44119

GEO Job# 9704102(D)-1996
Matrix Type: Soil
Samples Received: 04/22/97
Date Analyzed: 04/30-05/02/97
Analysis Reported: 05/06/97

Project Number: 731397.01000
Project Name: Canton Drop Forge

Sample Date: 04/18/97
Sample Description: CDF-2

GAS CHROMATOGRAPHY/MASS SPECTROMETRY FOR SEMI-VOLATILE ORGANICS IN SOIL

COMPOUNDS	RESULTS	REPORTING LIMIT
N-Nitrosodimethylamine	< 100	100
Phenol	< 20.0	20.0
2-Chlorophenol	< 20.0	20.0
bis(2-Chloroethyl)ether	< 20.0	20.0
1,3-Dichlorobenzene	< 20.0	20.0
1,4-Dichlorobenzene	< 20.0	20.0
1,2-Dichlorobenzene	< 20.0	20.0
2-Methylphenol	< 20.0	20.0
bis(2-Chloroisopropyl)ether	< 20.0	20.0
4-Methylphenol	< 20.0	20.0
Hexachloroethane	< 20.0	20.0
N-Nitroso-di-n-propylamine	< 100	100
Nitrobenzene	< 20.0	20.0
Isophorone	< 20.0	20.0
2-Nitrophenol	< 20.0	20.0
2,4-Dimethylphenol	< 20.0	20.0
bis(2-Chloroethoxy)methane	< 20.0	20.0
2,4-Dichlorophenol	< 20.0	20.0
1,2,4-Trichlorobenzene	< 20.0	20.0
Naphthalene	< 20.0	20.0
4-Chloroanaline	< 20.0	20.0
Hexachlorobutadiene	< 20.0	20.0
4-Chloro-3-methylphenol	< 20.0	20.0
2-Methylnaphthalene	< 20.0	20.0
Hexachlorocyclopentadiene	< 20.0	20.0
2,4,5-Trichlorophenol	< 20.0	20.0
2,4,6-Trichlorophenol	< 20.0	20.0
2-Chloronaphthalene	< 20.0	20.0
2-Nitroanaline	< 20.0	20.0
Acenaphthylene	< 20.0	20.0
Dimethyl phthalate	< 20.0	20.0
2,6-Dinitrotoluene	< 20.0	20.0
3-Nitroanaline	< 20.0	20.0
Acenaphthene	< 20.0	20.0
2,4-Dinitrophenol	< 100	100
4-Nitrophenol	< 20.0	20.0
Dibenzofuran	< 20.0	20.0
2,4-Dinitrotoluene	< 20.0	20.0
	mg/Kg	mg/Kg

G E O Analytical, Inc

GEO Job# 9704102(D)-1996
Page 2 of 2

COMPOUNDS	RESULTS	REPORTING LIMIT
Diethyl phthalate	< 20.0	20.0
Fluorene	< 20.0	20.0
4-Chlorophenylphenyl ether	< 20.0	20.0
4-Nitroanaline	< 20.0	20.0
2-Methyl-4,6-dinitrophenol	< 100	100
N-Nitrosodiphenylamine	< 20.0	20.0
4-Bromphenylphenyl ether	< 20.0	20.0
Hexachlorobenzene	< 20.0	20.0
Pentachlorophenol	< 20.0	20.0
Phenanthrene	< 20.0	20.0
Anthracene	< 20.0	20.0
Carbazole	< 20.0	20.0
Di-n-butyl phthalate	< 20.0	20.0
Fluoranthene	< 20.0	20.0
Pyrene	< 20.0	20.0
Butyl benzyl phthalate	< 20.0	20.0
Benzo(a)anthracene	< 20.0	20.0
3,3'-Dichlorobenzidine	< 100	100
Chrysene	< 20.0	20.0
bis(2-Ethylhexyl) phthalate	< 20.0	20.0
Di-n-octyl phthalate	< 20.0	20.0
Benzo(b)fluoranthene	< 20.0	20.0
Benzo(k)fluoranthene	< 20.0	20.0
Benzo(a)pyrene	< 20.0	20.0
Indeno(1,2,3-cd)pyrene	< 20.0	20.0
Dibenzo(a,h)anthracene	< 20.0	20.0
Benzo(ghi)perylene	< 20.0	20.0
	mg/Kg	mg/Kg

COMPOUND	% SURROGATE RECOVERY	ACCEPTABLE RANGE
2-Fluorophenol	92	33 - 144
Phenol d5	82	62 - 120
Nitrobenzene d5	102	60 - 132
2-Fluorobiphenyl	69	67 - 105
2,4,6-Tribromophenol	95	24 - 135
Terphenyl d14	94	49 - 141

* Indicates surrogate recovery outside of acceptable range.

Analytical Methodology Information

EPA Method SW846-8270B, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods"

Initial Calibration Date: 04/17/97-05/01/97
Continuing Calibration Date: 04/30-05/02/97
Analyst: T. Lang

REVIEWED AND APPROVED BY Christa Thomas

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G E O A n a l y t i c a l , I n c

Report Issued To: Parsons Engineering Science
19101 Villaview Road, Suite 300
Cleveland, Ohio 44119

GEO Job# 9704102(E)-1997
Matrix Type: Soil
Samples Received: 04/22/97
Date Analyzed: 04/30-05/02/97
Analysis Reported: 05/06/97

Project Number: 731397.01000
Project Name: Canton Drop Forge

Sample Date: 04/18/97
Sample Description: CDF-3

GAS CHROMATOGRAPHY/MASS SPECTROMETRY FOR SEMI-VOLATILE ORGANICS IN SOIL

COMPOUNDS	RESULTS	REPORTING LIMIT
N-Nitrosodimethylamine	< 100	100
Phenol	< 20.0	20.0
2-Chlorophenol	< 20.0	20.0
bis(2-Chloroethyl)ether	< 20.0	20.0
1,3-Dichlorobenzene	< 20.0	20.0
1,4-Dichlorobenzene	< 20.0	20.0
1,2-Dichlorobenzene	< 20.0	20.0
2-Methylphenol	< 20.0	20.0
bis(2-Chloroisopropyl)ether	< 20.0	20.0
4-Methylphenol	< 20.0	20.0
Hexachloroethane	< 20.0	20.0
N-Nitroso-di-n-propylamine	< 100	100
Nitrobenzene	< 20.0	20.0
Isophorone	< 20.0	20.0
2-Nitrophenol	< 20.0	20.0
2,4-Dimethylphenol	< 20.0	20.0
bis(2-Chloroethoxy)methane	< 20.0	20.0
2,4-Dichlorophenol	< 20.0	20.0
1,2,4-Trichlorobenzene	< 20.0	20.0
Naphthalene	< 20.0	20.0
4-Chloroanaline	< 20.0	20.0
Hexachlorobutadiene	< 20.0	20.0
4-Chloro-3-methylphenol	< 20.0	20.0
2-Methylnaphthalene	< 20.0	20.0
Hexachlorocyclopentadiene	< 20.0	20.0
2,4,5-Trichlorophenol	< 20.0	20.0
2,4,6-Trichlorophenol	< 20.0	20.0
2-Chloronaphthalene	< 20.0	20.0
2-Nitroanaline	< 20.0	20.0
Acenaphthylene	< 20.0	20.0
Dimethyl phthalate	< 20.0	20.0
2,6-Dinitrotoluene	< 20.0	20.0
3-Nitroanaline	< 20.0	20.0
Acenaphthene	< 20.0	20.0
2,4-Dinitrophenol	< 100	100
4-Nitrophenol	< 20.0	20.0
Dibenzofuran	< 20.0	20.0
2,4-Dinitrotoluene	< 20.0	20.0
	mg/Kg	mg/Kg

G E O A n a l y t i c a l, I n c

GEO Job# 9704102(E)-1997
Page 2 of 2

COMPOUNDS	RESULTS	REPORTING LIMIT
Diethyl phthalate	< 20.0	20.0
Fluorene	< 20.0	20.0
4-Chlorophenylphenyl ether	< 20.0	20.0
4-Nitroanaline	< 20.0	20.0
2-Methyl-4,6-dinitrophenol	< 100	100
N-Nitrosodiphenylamine	< 20.0	20.0
4-Bromphenylphenyl ether	< 20.0	20.0
Hexachlorobenzene	< 20.0	20.0
Pentachlorophenol	< 20.0	20.0
Phenanthrene	< 20.0	20.0
Anthracene	< 20.0	20.0
Carbazole	< 20.0	20.0
Di-n-butyl phthalate	< 20.0	20.0
Fluoranthene	< 20.0	20.0
Pyrene	< 20.0	20.0
Butyl benzyl phthalate	< 20.0	20.0
Benzo(a)anthracene	< 20.0	20.0
3,3'-Dichlorobenzidine	< 100	100
Chrysene	< 20.0	20.0
bis(2-Ethylhexyl) phthalate	< 20.0	20.0
Di-n-octyl phthalate	< 20.0	20.0
Benzo(b)fluoranthene	< 20.0	20.0
Benzo(k)fluoranthene	< 20.0	20.0
Benzo(a)pyrene	< 20.0	20.0
Indeno(1,2,3-cd)pyrene	< 20.0	20.0
Dibenzo(a,h)anthracene	< 20.0	20.0
Benzo(ghi)perylene	< 20.0	20.0
	mg/Kg	mg/Kg

COMPOUND	% SURROGATE RECOVERY	ACCEPTABLE RANGE
2-Fluorophenol	88	33 - 144
Phenol d5	78	62 - 120
Nitrobenzene d5	93	80 - 132
2-Fluorobiphenyl	74	67 - 105
2,4,6-Tribromophenol	101	24 - 135
Terphenyl d14	80	49 - 141

* Indicates surrogate recovery outside of acceptable range.

Analytical Methodology Information

EPA Method SW846-8270B, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods"

Initial Calibration Date: 04/17/97-05/01/97
Continuing Calibration Date: 04/30-05/02/97
Analyst: T. Lang

REVIEWED AND APPROVED BY Christa Thaxton

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G E O A n a l y t i c a l, I n c

Report Issued To: Parsons Engineering Science
19101 Villaview Road, Suite 300
Cleveland, Ohio 44119

GEO Job#	9704102(F)-1998	Project Number:	731397.01000
Matrix Type:	Soil		
Samples Received:	04/22/97	Project Name:	Canton Drop Forge
Date Analyzed:	04/30-05/02/97		
Analysis Reported:	05/06/97		

Sample Date: 04/18/97
Sample Description: CDF-4

GAS CHROMATOGRAPHY/MASS SPECTROMETRY FOR SEMI-VOLATILE ORGANICS IN SOIL

COMPOUNDS	RESULTS	REPORTING LIMIT
N-Nitrosodimethylamine	< 100	100
Phenol	< 20.0	20.0
2-Chlorophenol	< 20.0	20.0
bis(2-Chloroethyl)ether	< 20.0	20.0
1,3-Dichlorobenzene	< 20.0	20.0
1,4-Dichlorobenzene	< 20.0	20.0
1,2-Dichlorobenzene	< 20.0	20.0
2-Methylphenol	< 20.0	20.0
bis(2-Chloroisopropyl)ether	< 20.0	20.0
4-Methylphenol	< 20.0	20.0
Hexachloroethane	< 20.0	20.0
N-Nitroso-di-n-propylamine	< 100	100
Nitrobenzene	< 20.0	20.0
Isophorone	< 20.0	20.0
2-Nitrophenol	< 20.0	20.0
2,4-Dimethylphenol	< 20.0	20.0
bis(2-Chloroethoxy)methane	< 20.0	20.0
2,4-Dichlorophenol	< 20.0	20.0
1,2,4-Trichlorobenzene	< 20.0	20.0
Naphthalene	< 20.0	20.0
4-Chloroanaline	< 20.0	20.0
Hexachlorobutadiene	< 20.0	20.0
4-Chloro-3-methylphenol	< 20.0	20.0
2-Methylnaphthalene	< 20.0	20.0
Hexachlorocyclopentadiene	< 20.0	20.0
2,4,5-Trichlorophenol	< 20.0	20.0
2,4,6-Trichlorophenol	< 20.0	20.0
2-Chloronaphthalene	< 20.0	20.0
2-Nitroanaline	< 20.0	20.0
Acenaphthylene	< 20.0	20.0
Dimethyl phthalate	< 20.0	20.0
2,6-Dinitrotoluene	< 20.0	20.0
3-Nitroanaline	< 20.0	20.0
Acenaphthene	< 20.0	20.0
2,4-Dinitrophenol	< 100	100
4-Nitrophenol	< 20.0	20.0
Dibenzofuran	< 20.0	20.0
2,4-Dinitrotoluene	< 20.0	20.0
	mg/Kg	mg/Kg

GEO Analytical, Inc

GEO Job# 9704102(F)-1998
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COMPOUNDS	RESULTS	REPORTING LIMIT
Diethyl phthalate	< 20.0	20.0
Fluorene	< 20.0	20.0
4-Chlorophenylphenyl ether	< 20.0	20.0
4-Nitroaniline	< 20.0	20.0
2-Methyl-4,6-dinitrophenol	< 100	100
N-Nitrosodiphenylamine	< 20.0	20.0
4-Bromphenylphenyl ether	< 20.0	20.0
Hexachlorobenzene	< 20.0	20.0
Pentachlorophenol	< 20.0	20.0
Phenanthrene	< 20.0	20.0
Anthracene	< 20.0	20.0
Carbazole	< 20.0	20.0
Di-n-butyl phthalate	< 20.0	20.0
Fluoranthene	< 20.0	20.0
Pyrene	< 20.0	20.0
Butyl benzyl phthalate	< 20.0	20.0
Benzo(a)anthracene	< 20.0	20.0
3,3'-Dichlorobenzidine	< 100	100
Chrysene	< 20.0	20.0
bis(2-Ethylhexyl) phthalate	< 20.0	20.0
Di-n-octyl phthalate	< 20.0	20.0
Benzo(b)fluoranthene	< 20.0	20.0
Benzo(k)fluoranthene	< 20.0	20.0
Benzo(a)pyrene	< 20.0	20.0
Indeno(1,2,3-cd)pyrene	< 20.0	20.0
Dibenzo(a,h)anthracene	< 20.0	20.0
Benzo(ghi)perylene	< 20.0	20.0
	mg/Kg	mg/Kg

COMPOUND	% SURROGATE RECOVERY	ACCEPTABLE RANGE
2-Fluorophenol	82	33 - 144
Phenol d5	72	62 - 120
Nitrobenzene d5	86	80 - 132
2-Fluorobiphenyl	95	67 - 105
2,4,6-Tribromophenol	92	24 - 135
Terphenyl d14	79	49 - 141

* Indicates surrogate recovery outside of acceptable range.

Analytical Methodology Information

EPA Method SW846-8270B, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods"

Initial Calibration Date: 04/17/97-05/01/97
Continuing Calibration Date: 04/30-05/02/97
Analyst: T. Lang

REVIEWED AND APPROVED BY Christie Thomas

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G E O Analytical, Inc

Report Issued To: Parsons Engineering Science
19101 Villaview Road, Suite 300
Cleveland, Ohio 44119.

GEO Job# 9704102(G)-1999
Matrix Type: Soil
Samples Received: 04/22/97
Date Analyzed: 04/30-05/03/97
Analysis Reported: 05/06/97

Project Number: 731397.01000
Project Name: Canton Drop Forge

Sample Date: 04/18/97
Sample Description: CDF-5

GAS CHROMATOGRAPHY/MASS SPECTROMETRY FOR SEMI-VOLATILE ORGANICS IN SOIL

COMPOUNDS	RESULTS	REPORTING LIMIT
N-Nitrosodimethylamine	< 100	100
Phenol	< 20.0	20.0
2-Chlorophenol	< 20.0	20.0
bis(2-Chloroethyl)ether	< 20.0	20.0
1,3-Dichlorobenzene	< 20.0	20.0
1,4-Dichlorobenzene	< 20.0	20.0
1,2-Dichlorobenzene	< 20.0	20.0
2-Methylphenol	< 20.0	20.0
bis(2-Chloroisopropyl)ether	< 20.0	20.0
4-Methylphenol	< 20.0	20.0
Hexachloroethane	< 20.0	20.0
N-Nitroso-di-n-propylamine	< 100	100
Nitrobenzene	< 20.0	20.0
Isophorone	< 20.0	20.0
2-Nitrophenol	< 20.0	20.0
2,4-Dimethylphenol	< 20.0	20.0
bis(2-Chloroethoxy)methane	< 20.0	20.0
2,4-Dichlorophenol	< 20.0	20.0
1,2,4-Trichlorobenzene	< 20.0	20.0
Naphthalene	< 20.0	20.0
4-Chloroanaline	< 20.0	20.0
Hexachlorobutadiene	< 20.0	20.0
4-Chloro-3-methylphenol	< 20.0	20.0
2-Methylnaphthalene	< 20.0	20.0
Hexachlorocyclopentadiene	< 20.0	20.0
2,4,5-Trichlorophenol	< 20.0	20.0
2,4,6-Trichlorophenol	< 20.0	20.0
2-Chloronaphthalene	< 20.0	20.0
2-Nitroanaline	< 20.0	20.0
Acenaphthylene	< 20.0	20.0
Dimethyl phthalate	< 20.0	20.0
2,6-Dinitrotoluene	< 20.0	20.0
3-Nitroanaline	< 20.0	20.0
Acenaphthene	< 20.0	20.0
2,4-Dinitrophenol	< 100	100
4-Nitrophenol	< 20.0	20.0
Dibenzofuran	< 20.0	20.0
2,4-Dinitrotoluene	< 20.0	20.0
	mg/Kg	mg/Kg

G E O A n a l y t i c a l, I n c

GEO Job# 9704102(G)-1999
Page 2 of 2

COMPOUNDS	RESULTS	REPORTING LIMIT
Diethyl phthalate	< 20.0	20.0
Fluorene	< 20.0	20.0
4-Chlorophenylphenyl ether	< 20.0	20.0
4-Nitroanaline	< 20.0	20.0
2-Methyl-4,6-dinitrophenol	< 100	100
N-Nitrosodiphenylamine	< 20.0	20.0
4-Bromphenylphenyl ether	< 20.0	20.0
Hexachlorobenzene	< 20.0	20.0
Pentachlorophenol	< 20.0	20.0
Phenanthrene	< 20.0	20.0
Anthracene	< 20.0	20.0
Carbazole	< 20.0	20.0
Di-n-butyl phthalate	< 20.0	20.0
Fluoranthene	< 20.0	20.0
Pyrene	< 20.0	20.0
Butyl benzyl phthalate	< 20.0	20.0
Benzo(a)anthracene	< 20.0	20.0
3,3'-Dichlorobenzidine	< 100	100
Chrysene	< 20.0	20.0
bis(2-Ethylhexyl) phthalate	< 20.0	20.0
Di-n-octyl phthalate	< 20.0	20.0
Benzo(b)fluoranthene	< 20.0	20.0
Benzo(k)fluoranthene	< 20.0	20.0
Benzo(a)pyrene	< 20.0	20.0
Indeno(1,2,3-cd)pyrene	< 20.0	20.0
Dibenzo(a,h)anthracene	< 20.0	20.0
Benzo(ghi)perylene	< 20.0	20.0
	mg/Kg	mg/Kg

COMPOUND	% SURROGATE RECOVERY	ACCEPTABLE RANGE
2-Fluorophenol	60	33 - 144
Phenol d5	71	62 - 120
Nitrobenzene d5	91	80 - 132
2-Fluorobiphenyl	101	67 - 105
2,4,6-Tribromophenol	94	24 - 135
Terphenyl d14	84	49 - 141

* Indicates surrogate recovery outside of acceptable range.

Analytical Methodology Information

EPA Method SW846-8270B, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods"

Initial Calibration Date: 04/17/97-05/01/97
Continuing Calibration Date: 04/30-05/03/97
Analyst: T. Lang

REVIEWED AND APPROVED BY: Christie Thrasher

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G E O A n a l y t i c a l I n c

Report Issued To: Parsons Engineering Science
19101 Villaview Road, Suite 300
Cleveland, Ohio 44119

GEO Job#: 9704102(H)-2000
Matrix Type: Soil
Samples Received: 04/22/97
Date Analyzed: 04/30-05/03/97
Analysis Reported: 05/08/97

Project Number: 731397.01000
Project Name: Canton Drop Forge

Sample Date: 04/18/97
Sample Description: CDF-6

GAS CHROMATOGRAPHY/MASS SPECTROMETRY FOR SEMI-VOLATILE ORGANICS IN SOIL

COMPOUNDS	RESULTS	REPORTING LIMIT
N-Nitrosodimethylamine	< 100	100
Phenol	< 20.0	20.0
2-Chlorophenol	< 20.0	20.0
bis(2-Chloroethyl)ether	< 20.0	20.0
1,3-Dichlorobenzene	< 20.0	20.0
1,4-Dichlorobenzene	< 20.0	20.0
1,2-Dichlorobenzene	< 20.0	20.0
2-Methylphenol	< 20.0	20.0
bis(2-Chloroisopropyl)ether	< 20.0	20.0
4-Methylphenol	< 20.0	20.0
Hexachloroethane	< 20.0	20.0
N-Nitroso-di-n-propylamine	< 100	100
Nitrobenzene	< 20.0	20.0
Isophorone	< 20.0	20.0
2-Nitrophenol	< 20.0	20.0
2,4-Dimethylphenol	< 20.0	20.0
bis(2-Chloroethoxy)methane	< 20.0	20.0
2,4-Dichlorophenol	< 20.0	20.0
1,2,4-Trichlorobenzene	< 20.0	20.0
Naphthalene	< 20.0	20.0
4-Chloroanaline	< 20.0	20.0
Hexachlorobutadiene	< 20.0	20.0
4-Chloro-3-methylphenol	< 20.0	20.0
2-Methylnaphthalene	< 20.0	20.0
Hexachlorocyclopentadiene	< 20.0	20.0
2,4,5-Trichlorophenol	< 20.0	20.0
2,4,6-Trichlorophenol	< 20.0	20.0
2-Chloronaphthalene	< 20.0	20.0
2-Nitroanaline	< 20.0	20.0
Acenaphthylene	< 20.0	20.0
Dimethyl phthalate	< 20.0	20.0
2,6-Dinitrotoluene	< 20.0	20.0
3-Nitroanaline	< 20.0	20.0
Acenaphthene	< 20.0	20.0
2,4-Dinitrophenol	< 100	100
4-Nitrophenol	< 20.0	20.0
Dibenzofuran	< 20.0	20.0
2,4-Dinitrotoluene	< 20.0	20.0
	mg/Kg	mg/Kg

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GEO Job# 9704102(H)-2000
Page 2 of 2

COMPOUNDS	RESULTS	REPORTING LIMIT
Diethyl phthalate	< 20.0	20.0
Fluorene	< 20.0	20.0
4-Chlorophenylphenyl ether	< 20.0	20.0
4-Nitroanaline	< 20.0	20.0
2-Methyl-4,6-dinitrophenol	< 100	100
N-Nitrosodiphenylamine	< 20.0	20.0
4-Bromphenylphenyl ether	< 20.0	20.0
Hexachlorobenzene	< 20.0	20.0
Pentachlorophenol	< 20.0	20.0
Phenanthrene	< 20.0	20.0
Anthracene	< 20.0	20.0
Carbazole	< 20.0	20.0
Di-n-butyl phthalate	< 20.0	20.0
Fluoranthene	< 20.0	20.0
Pyrene	< 20.0	20.0
Butyl benzyl phthalate	< 20.0	20.0
Benzo(a)anthracene	< 20.0	20.0
3,3'-Dichlorobenzidine	< 100	100
Chrysene	< 20.0	20.0
bis(2-Ethylhexyl) phthalate	< 20.0	20.0
Di-n-octyl phthalate	< 20.0	20.0
Benzo(b)fluoranthene	< 20.0	20.0
Benzo(k)fluoranthene	< 20.0	20.0
Benzo(a)pyrene	< 20.0	20.0
Indeno(1,2,3-cd)pyrene	< 20.0	20.0
Dibenzo(a,h)anthracene	< 20.0	20.0
Benzo(ghi)perylene	< 20.0	20.0
	mg/Kg	mg/Kg

COMPOUND	% SURROGATE RECOVERY	ACCEPTABLE RANGE
2-Fluorophenol	86	33 - 144
Phenol d5	75	62 - 120
Nitrobenzene d5	84	80 - 132
2-Fluorobiphenyl	98	67 - 105
2,4,6-Tribromophenol	88	24 - 135
Terphenyl d14	89	49 - 141

* Indicates surrogate recovery outside of acceptable range.

Analytical Methodology Information

EPA Method SW846-8270B, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods"

Initial Calibration Date: 04/17/97-05/01/97
Continuing Calibration Date: 04/30-05/03/97
Analyst: T. Lang

REVIEWED AND APPROVED BY Christy Thorn

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G E O A n a l y t i c a l, I n c

Report Issued To: Parsons Engineering Science
19101 Villaview Road, Suite 300
Cleveland, Ohio 44119

GEO Job# 9704102(I)-2001
Matrix Type: Soil
Samples Received: 04/22/97
Date Analyzed: 04/30-05/05/97
Analysis Reported: 05/06/97

Project Number: 731397.01000
Project Name: Canton Drop Forge

Sample Date: 04/18/97
Sample Description: CDF-7

GAS CHROMATOGRAPHY/MASS SPECTROMETRY FOR SEMI-VOLATILE ORGANICS IN SOIL

COMPOUNDS	RESULTS	REPORTING LIMIT
N-Nitrosodimethylamine	< 100	100
Phenol	< 20.0	20.0
2-Chlorophenol	< 20.0	20.0
bis(2-Chloroethyl)ether	< 20.0	20.0
1,3-Dichlorobenzene	< 20.0	20.0
1,4-Dichlorobenzene	< 20.0	20.0
1,2-Dichlorobenzene	< 20.0	20.0
2-Methylphenol	< 20.0	20.0
bis(2-Chloroisopropyl)ether	< 20.0	20.0
4-Methylphenol	< 20.0	20.0
Hexachloroethane	< 20.0	20.0
N-Nitroso-di-n-propylamine	< 100	100
Nitrobenzene	< 20.0	20.0
Isophorone	< 20.0	20.0
2-Nitrophenol	< 20.0	20.0
2,4-Dimethylphenol	< 20.0	20.0
bis(2-Chloroethoxy)methane	< 20.0	20.0
2,4-Dichlorophenol	< 20.0	20.0
1,2,4-Trichlorobenzene	< 20.0	20.0
Naphthalene	< 20.0	20.0
4-Chloroanaline	< 20.0	20.0
Hexachlorobutadiene	< 20.0	20.0
4-Chloro-3-methylphenol	< 20.0	20.0
2-Methylnaphthalene	< 20.0	20.0
Hexachlorocyclopentadiene	< 20.0	20.0
2,4,5-Trichlorophenol	< 20.0	20.0
2,4,6-Trichlorophenol	< 20.0	20.0
2-Chloronaphthalene	< 20.0	20.0
2-Nitroanaline	< 20.0	20.0
Acenaphthylene	< 20.0	20.0
Dimethyl phthalate	< 20.0	20.0
2,6-Dinitrotoluene	< 20.0	20.0
3-Nitroanaline	< 20.0	20.0
Acenaphthene	< 20.0	20.0
2,4-Dinitrophenol	< 100	100
4-Nitrophenol	< 20.0	20.0
Dibenzofuran	< 20.0	20.0
2,4-Dinitrotoluene	< 20.0	20.0
	mg/Kg	mg/Kg

G E O A n a l y t i c a l, I n c

GEO Job# 9704102(I)-2001
Page 2 of 2

COMPOUNDS	RESULTS	REPORTING LIMIT
Diethyl phthalate	< 20.0	20.0
Fluorene	< 20.0	20.0
4-Chlorophenylphenyl ether	< 20.0	20.0
4-Nitroaniline	< 20.0	20.0
2-Methyl-4,6-dinitrophenol	< 100	100
N-Nitrosodiphenylamine	< 20.0	20.0
4-Bromophenylphenyl ether	< 20.0	20.0
Hexachlorobenzene	< 20.0	20.0
Pentachlorophenol	< 20.0	20.0
Phenanthrene	< 20.0	20.0
Anthracene	< 20.0	20.0
Carbazole	< 20.0	20.0
Di-n-butyl phthalate	< 20.0	20.0
Fluoranthene	< 20.0	20.0
Pyrene	25.2	20.0
Butyl benzyl phthalate	< 20.0	20.0
Benzo(a)anthracene	< 20.0	20.0
3,3'-Dichlorobenzidine	< 100	100
Chrysene	22.5	20.0
bis(2-Ethylhexyl) phthalate	< 20.0	20.0
Di-n-octyl phthalate	< 20.0	20.0
Benzo(b)fluoranthene	< 20.0	20.0
Benzo(k)fluoranthene	< 20.0	20.0
Benzo(a)pyrene	< 20.0	20.0
Indeno(1,2,3-cd)pyrene	< 20.0	20.0
Dibenzo(a,h)anthracene	< 20.0	20.0
Benzo(ghi)perylene	< 20.0	20.0
	mg/Kg	mg/Kg

COMPOUND	% SURROGATE RECOVERY	ACCEPTABLE RANGE
2-Fluorophenol	92	33 - 144
Phenol d5	64	62 - 120
Nitrobenzene d5	75*	80 - 132
2-Fluorobiphenyl	74	67 - 105
2,4,6-Tribromophenol	87	24 - 135
Terphenyl d14	100	49 - 141

* Indicates surrogate recovery outside of acceptable range.
**Analytical results for this sample are estimated concentration due to low surrogate recovery.

Analytical Methodology Information

EPA Method SW846-8270B, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods"

Initial Calibration Date: 04/17/97-05/01/97
Continuing Calibration Date: 04/30-05/05/97
Analyst: T. Lang

REVIEWED AND APPROVED BY Christie Thorm

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G E O A n a l y t i c a l , I n c

Report Issued To: Parsons Engineering Science
19101 Villaview Road, Suite 300
Cleveland, Ohio 44119

GEO Job# 9704102(J)-2002
Matrix Type: Soil
Samples Received: 04/22/97
Date Analyzed: 05/02-05/97
Analysis Reported: 05/06/97

Project Number: 731397.01000
Project Name: Canton Drop Forge

Sample Date: 04/16/97
Sample Description: CDF-8

GAS CHROMATOGRAPHY/MASS SPECTROMETRY FOR SEMI-VOLATILE ORGANICS IN SOIL

COMPOUNDS	RESULTS	REPORTING LIMIT
N-Nitrosodimethylamine	< 100	100
Phenol	< 20.0	20.0
2-Chlorophenol	< 20.0	20.0
bis(2-Chloroethyl)ether	< 20.0	20.0
1,3-Dichlorobenzene	< 20.0	20.0
1,4-Dichlorobenzene	< 20.0	20.0
1,2-Dichlorobenzene	< 20.0	20.0
2-Methylphenol	< 20.0	20.0
bis(2-Chloroisopropyl)ether	< 20.0	20.0
4-Methylphenol	< 20.0	20.0
Hexachloroethane	< 20.0	20.0
N-Nitroso-di-n-propylamine	< 100	100
Nitrobenzene	< 20.0	20.0
Isophorone	< 20.0	20.0
2-Nitrophenol	< 20.0	20.0
2,4-Dimethylphenol	< 20.0	20.0
bis(2-Chloroethoxy)methane	< 20.0	20.0
2,4-Dichlorophenol	< 20.0	20.0
1,2,4-Trichlorobenzene	< 20.0	20.0
Naphthalene	< 20.0	20.0
4-Chloroanaline	< 20.0	20.0
Hexachlorobutadiene	< 20.0	20.0
4-Chloro-3-methylphenol	< 20.0	20.0
2-Methylnaphthalene	< 20.0	20.0
Hexachlorocyclopentadiene	< 20.0	20.0
2,4,5-Trichlorophenol	< 20.0	20.0
2,4,6-Trichlorophenol	< 20.0	20.0
2-Chloronaphthalene	< 20.0	20.0
2-Nitroanaline	< 20.0	20.0
Acenaphthylene	< 20.0	20.0
Dimethyl phthalate	< 20.0	20.0
2,6-Dinitrotoluene	< 20.0	20.0
3-Nitroanaline	< 20.0	20.0
Acenaphthene	< 20.0	20.0
2,4-Dinitrophenol	< 100	100
4-Nitrophenol	< 20.0	20.0
Dibenzofuran	< 20.0	20.0
2,4-Dinitrotoluene	< 20.0	20.0
	mg/Kg	mg/Kg

G E O . A n a l y t i c a l , I n c

GEO Job# 9704102(J)-2002
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COMPOUNDS	RESULTS	REPORTING LIMIT
Diethyl phthalate	< 20.0	20.0
Fluorene	< 20.0	20.0
4-Chlorophenylphenyl ether	< 20.0	20.0
4-Nitroanaline	< 20.0	20.0
2-Methyl-4,6-dinitrophenol	< 100	100
N-Nitrosodiphenylamine	< 20.0	20.0
4-Bromphenylphenyl ether	< 20.0	20.0
Hexachlorobenzene	< 20.0	20.0
Pentachlorophenol	< 20.0	20.0
Phenanthrene	< 20.0	20.0
Anthracene	< 20.0	20.0
Carbazole	< 20.0	20.0
Di-n-butyl phthalate	< 20.0	20.0
Fluoranthene	< 20.0	20.0
Pyrene	20.5	20.0
Butyl benzyl phthalate	< 20.0	20.0
Benzo(a)anthracene	< 20.0	20.0
3,3'-Dichlorobenzidine	< 100	100
Chrysene	25.8	20.0
bis(2-Ethylhexyl) phthalate	< 20.0	20.0
Di-n-octyl phthalate	< 20.0	20.0
Benzo(b)fluoranthene	< 20.0	20.0
Benzo(k)fluoranthene	< 20.0	20.0
Benzo(a)pyrene	< 20.0	20.0
Indeno(1,2,3-cd)pyrene	< 20.0	20.0
Dibenzo(a,h)anthracene	< 20.0	20.0
Benzo(ghi)perylene	< 20.0	20.0
	mg/Kg	mg/Kg

COMPOUND	% SURROGATE RECOVERY	ACCEPTABLE RANGE
2-Fluorophenol	75	33 - 144
Phenol d5	59*	62 - 120
Nitrobenzene d5	72*	80 - 132
2-Fluorobiphenyl	102	67 - 105
2,4,6-Tribromophenol	85	24 - 135
Terphenyl d14	92	49 - 141

* Indicates surrogate recovery outside of acceptable range.
**Analytical results for this sample are estimated concentration due to low surrogate recovery.

Analytical Methodology Information

EPA Method SW846-8270B, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods"

Initial Calibration Date: 05/01/97
Continuing Calibration Date: 05/02-05/97
Analyst: T. Lang

REVIEWED AND APPROVED BY: Christie Thaxton

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G E O A n a l y t i c a l, I n c

Report Issued To: Parsons Engineering Science
19101 Villaview Road, Suite 300
Cleveland, Ohio 44119

GEO Job#	9704102(K)-2003	Project Number:	731397.01000
Matrix Type:	Soil		
Samples Received:	04/22/97	Project Name:	Canton Drop Forge
Date Analyzed:	05/02-05/97		
Analysis Reported:	05/06/97		

Sample Date: 04/18/97
Sample Description: CDF-9

GAS CHROMATOGRAPHY/MASS SPECTROMETRY FOR SEMI-VOLATILE ORGANICS IN SOIL

COMPOUNDS	RESULTS	REPORTING LIMIT
N-Nitrosodimethylamine	< 100	100
Phenol	< 20.0	20.0
2-Chlorophenol	< 20.0	20.0
bis(2-Chloroethyl)ether	< 20.0	20.0
1,3-Dichlorobenzene	< 20.0	20.0
1,4-Dichlorobenzene	< 20.0	20.0
1,2-Dichlorobenzene	< 20.0	20.0
2-Methylphenol	< 20.0	20.0
bis(2-Chloroisopropyl)ether	< 20.0	20.0
4-Methylphenol	< 20.0	20.0
Hexachloroethane	< 20.0	20.0
N-Nitroso-di-n-propylamine	< 100	100
Nitrobenzene	< 20.0	20.0
Isophorone	< 20.0	20.0
2-Nitrophenol	< 20.0	20.0
2,4-Dimethylphenol	< 20.0	20.0
bis(2-Chloroethoxy)methane	< 20.0	20.0
2,4-Dichlorophenol	< 20.0	20.0
1,2,4-Trichlorobenzene	< 20.0	20.0
Naphthalene	< 20.0	20.0
4-Chloroanaline	< 20.0	20.0
Hexachlorobutadiene	< 20.0	20.0
4-Chloro-3-methylphenol	< 20.0	20.0
2-Methylnaphthalene	< 20.0	20.0
Hexachlorocyclopentadiene	< 20.0	20.0
2,4,5-Trichlorophenol	< 20.0	20.0
2,4,6-Trichlorophenol	< 20.0	20.0
2-Chloronaphthalene	< 20.0	20.0
2-Nitroanaline	< 20.0	20.0
Acenaphthylene	< 20.0	20.0
Dimethyl phthalate	< 20.0	20.0
2,6-Dinitrotoluene	< 20.0	20.0
3-Nitroanaline	< 20.0	20.0
Acenaphthene	< 20.0	20.0
2,4-Dinitrophenol	< 100	100
4-Nitrophenol	< 20.0	20.0
Dibenzofuran	< 20.0	20.0
2,4-Dinitrotoluene	< 20.0	20.0
	mg/Kg	mg/Kg

G E O A n a l y t i c a l, I n c

GEO Job#: 9704102(K)-2003
Page 2 of 2

COMPOUNDS	RESULTS	REPORTING LIMIT
Diethyl phthalate	< 20.0	20.0
Fluorene	< 20.0	20.0
4-Chlorophenylphenyl ether	< 20.0	20.0
4-Nitroanaline	< 20.0	20.0
2-Methyl-4,6-dinitrophenol	< 100	100
N-Nitrosodiphenylamine	< 20.0	20.0
4-Bromphenylphenyl ether	< 20.0	20.0
Hexachlorobenzene	< 20.0	20.0
Pentachlorophenol	< 20.0	20.0
Phenanthrene	< 20.0	20.0
Anthracene	< 20.0	20.0
Carbazole	< 20.0	20.0
Di-n-butyl phthalate	< 20.0	20.0
Fluoranthene	< 20.0	20.0
Pyrene	22.5	20.0
Butyl benzyl phthalate	< 20.0	20.0
Benzo(a)anthracene	< 20.0	20.0
3,3'-Dichlorobenzidine	< 100	100
Chrysene	22.1	20.0
bis(2-Ethylhexyl) phthalate	< 20.0	20.0
Di-n-octyl phthalate	< 20.0	20.0
Benzo(b)fluoranthene	< 20.0	20.0
Benzo(k)fluoranthene	< 20.0	20.0
Benzo(a)pyrene	< 20.0	20.0
Indeno(1,2,3-cd)pyrene	< 20.0	20.0
Dibenzo(a,h)anthracene	< 20.0	20.0
Benzo(ghi)perylene	< 20.0	20.0
	mg/Kg	mg/Kg

COMPOUND	% SURROGATE RECOVERY	ACCEPTABLE RANGE
2-Fluorophenol	80	33 - 144
Phenol d5	60*	62 - 120
Nitrobenzene d5	78*	80 - 132
2-Fluorobiphenyl	92	67 - 105
2,4,6-Tribromophenol	71	24 - 135
Terphenyl d14	94	49 - 141

* Indicates surrogate recovery outside of acceptable range.
***Analytical results for this sample are estimated concentration due to low surrogate recovery.

Analytical Methodology Information

EPA Method SW846-8270B, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods"

Initial Calibration Date: 05/01/97
Continuing Calibration Date: 05/02-05/97
Analyst: T. Lang

REVIEWED AND APPROVED BY Christi Thoxton

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G E O A n a l y t i c a l , I n c

Report Issued To: Parsons Engineering Science
19101 Villaview Road, Suite 300
Cleveland, Ohio 44119

GEO Job#	9704102(L)-2004	Project Number:	731397.01000
Matrix Type:	Soil		
Samples Received:	04/22/97	Project Name:	Canton Drop Forge
Date Analyzed:	05/02/97		
Analysis Reported:	05/06/97		

Sample Date: 04/18/97
Sample Description: CDF-10

GAS CHROMATOGRAPHY/MASS SPECTROMETRY FOR SEMI-VOLATILE ORGANICS IN SOIL

COMPOUNDS	RESULTS	REPORTING LIMIT
N-Nitrosodimethylamine	< 100	100
Phenol	< 20.0	20.0
2-Chlorophenol	< 20.0	20.0
bis(2-Chloroethyl)ether	< 20.0	20.0
1,3-Dichlorobenzene	< 20.0	20.0
1,4-Dichlorobenzene	< 20.0	20.0
1,2-Dichlorobenzene	< 20.0	20.0
2-Methylphenol	< 20.0	20.0
bis(2-Chloroisopropyl)ether	< 20.0	20.0
4-Methylphenol	< 20.0	20.0
Hexachloroethane	< 20.0	20.0
N-Nitroso-di-n-propylamine	< 100	100
Nitrobenzene	< 20.0	20.0
Isophorone	< 20.0	20.0
2-Nitrophenol	< 20.0	20.0
2,4-Dimethylphenol	< 20.0	20.0
bis(2-Chloroethoxy)methane	< 20.0	20.0
2,4-Dichlorophenol	< 20.0	20.0
1,2,4-Trichlorobenzene	< 20.0	20.0
Naphthalene	< 20.0	20.0
4-Chloroanaline	< 20.0	20.0
Hexachlorobutadiene	< 20.0	20.0
4-Chloro-3-methylphenol	< 20.0	20.0
2-Methylnaphthalene	< 20.0	20.0
Hexachlorocyclopentadiene	< 20.0	20.0
2,4,5-Trichlorophenol	< 20.0	20.0
2,4,6-Trichlorophenol	< 20.0	20.0
2-Chloronaphthalene	< 20.0	20.0
2-Nitroanaline	< 20.0	20.0
Acenaphthylene	< 20.0	20.0
Dimethyl phthalate	< 20.0	20.0
2,6-Dinitrotoluene	< 20.0	20.0
3-Nitroanaline	< 20.0	20.0
Acenaphthene	< 20.0	20.0
2,4-Dinitrophenol	< 100	100
4-Nitrophenol	< 20.0	20.0
Dibenzofuran	< 20.0	20.0
2,4-Dinitrotoluene	< 20.0	20.0
	mg/Kg	mg/Kg

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G E O Analytical, Inc

GEO Job# 9704102(L)-2004
Page 2 of 2

COMPOUNDS	RESULTS	REPORTING LIMIT
Diethyl phthalate	< 20.0	20.0
Fluorene	< 20.0	20.0
4-Chlorophenylphenyl ether	< 20.0	20.0
4-Nitroanaline	< 20.0	20.0
2-Methyl-4,6-dinitrophenol	< 100	100
N-Nitrosodiphenylamine	< 20.0	20.0
4-Bromphenylphenyl ether	< 20.0	20.0
Hexachlorobenzene	< 20.0	20.0
Pentachlorophenol	< 20.0	20.0
Phenanthrene	< 20.0	20.0
Anthracene	< 20.0	20.0
Carbazole	< 20.0	20.0
Di-n-butyl phthalate	< 20.0	20.0
Fluoranthene	< 20.0	20.0
Pyrene	< 20.0	20.0
Butyl benzyl phthalate	< 20.0	20.0
Benzo(a)anthracene	< 20.0	20.0
3,3'-Dichlorobenzidine	< 100	100
Chrysene	< 20.0	20.0
bis(2-Ethylhexyl) phthalate	< 20.0	20.0
Di-n-octyl phthalate	< 20.0	20.0
Benzo(b)fluoranthene	< 20.0	20.0
Benzo(k)fluoranthene	< 20.0	20.0
Benzo(a)pyrene	< 20.0	20.0
Indeno(1,2,3-cd)pyrene	< 20.0	20.0
Dibenzo(a,h)anthracene	< 20.0	20.0
Benzo(ghi)perylene	< 20.0	20.0
	mg/Kg	mg/Kg

COMPOUND	% SURROGATE RECOVERY	ACCEPTABLE RANGE
2-Fluorophenol	88	33 - 144
Phenol d5	76	62 - 120
Nitrobenzene d5	90	80 - 132
2-Fluorobiphenyl	98	67 - 105
2,4,6-Tribromophenol	98	24 - 135
Terphenyl d14	82	49 - 141

* Indicates surrogate recovery outside of acceptable range.

Analytical Methodology Information

EPA Method SW846-8270B, "Test Methods for Evaluating Solid Waste; Physical/Chemical Methods"

Initial Calibration Date: 05/01/97
Continuing Calibration Date: 05/02/97
Analyst: T. Lang

REVIEWED AND APPROVED BY Christie Thorson

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G E O . A n a l y t i c a l , I n c

Report Issued To: Parsons Engineering Science
19101 Villaview Road, Suite 300
Cleveland, Ohio 44119

GEO Job# 9704102(C)-1995
Matrix Type: Soil
Samples Received: 04/22/97
Date Analyzed: 04/30-05/02/97
Analysis Reported: 05/06/97

Project Number: 731397.01000
Project Name: Canton Drop Forge

Sample Date: 04/18/97
Sample Description: CDF-1

GAS CHROMATOGRAPHY/MASS SPECTROMETRY FOR SEMI-VOLATILE ORGANICS IN SOIL

COMPOUNDS	RESULTS	REPORTING LIMIT
N-Nitrosodimethylamine	< 100	100
Phenol	< 20.0	20.0
2-Chlorophenol	< 20.0	20.0
bis(2-Chloroethyl)ether	< 20.0	20.0
1,3-Dichlorobenzene	< 20.0	20.0
1,4-Dichlorobenzene	< 20.0	20.0
1,2-Dichlorobenzene	< 20.0	20.0
2-Methylphenol	< 20.0	20.0
bis(2-Chloroisopropyl)ether	< 20.0	20.0
4-Methylphenol	< 20.0	20.0
Hexachloroethane	< 20.0	20.0
N-Nitroso-di-n-propylamine	< 100	100
Nitrobenzene	< 20.0	20.0
Isophorone	< 20.0	20.0
2-Nitrophenol	< 20.0	20.0
2,4-Dimethylphenol	< 20.0	20.0
bis(2-Chloroethoxy)methane	< 20.0	20.0
2,4-Dichlorophenol	< 20.0	20.0
1,2,4-Trichlorobenzene	< 20.0	20.0
Naphthalene	< 20.0	20.0
4-Chloroanaline	< 20.0	20.0
Hexachlorobutadiene	< 20.0	20.0
4-Chloro-3-methylphenol	< 20.0	20.0
2-Methylnaphthalene	< 20.0	20.0
Hexachlorocyclopentadiene	< 20.0	20.0
2,4,5-Trichlorophenol	< 20.0	20.0
2,4,6-Trichlorophenol	< 20.0	20.0
2-Chloronaphthalene	< 20.0	20.0
2-Nitroanaline	< 20.0	20.0
Acenaphthylene	< 20.0	20.0
Dimethyl phthalate	< 20.0	20.0
2,6-Dinitrotoluene	< 20.0	20.0
3-Nitroanaline	< 20.0	20.0
Acenaphthene	< 20.0	20.0
2,4-Dinitrophenol	< 100	100
4-Nitrophenol	< 20.0	20.0
Dibenzofuran	< 20.0	20.0
2,4-Dinitrotoluene	< 20.0	20.0
	mg/Kg	mg/Kg

APPENDIX B:

RESULTS OF GEOTECHNICAL ANALYSES AND STABILITY TESTING FROM APPLIED CONSTRUCTION TECHNOLOGIES, INC.

FOR

CANTON DROP FORGE, INC.
CANTON, OHIO

MAY 1997

ENGINEERING • TESTING • INSPECTION

APPLIED CONSTRUCTION TECHNOLOGIES, INC.

210 HAYES DRIVE • SUITE C • CLEVELAND, OHIO 44131 • (216) 459-TEST • FAX (216) 459-8954
478 E. EXCHANGE ST. • SUITE 202 • AKRON, OHIO 44304 • (216) 253-TEST • FAX (216) 253-3462

May 12, 1997

Parsons Engineering Science, Inc.
19101 Villaview Road, Suite 301
Cleveland, Ohio 44119

Attention: Mr. Rick Volpi

SUBJECT: LABORATORY TEST RESULTS
OILY CLAYEY GRAVEL AND SAND FROM
CANTON DROP FORGE

ACT PROJECT NO. 9705.08

Enclosed are the laboratory test results which have been completed on the sample of black oily clayey gravel and sand which was submitted to us on April 18, 1997. Reportedly the material is from Canton Drop Forge and the material is to be placed within a clay lined and capped cell for biological treatment.

It is our understanding that in its present condition the material is very difficult to work with and is not expected to be stable enough to construct a compacted clay cap over it. To improve its stability, we mixed various mixtures of lime and fly ash into the oily waste material. The granular nature of the material made it unsuitable for compression testing; therefore, the stability of the oily waste and the various mixtures of lime, fly ash, and waste were determined by conducting California Bearing Ratio tests (ASTM D1883). The test results are summarized below:

	Compacted Density	CBR
Oily Waste without Lime and Fly Ash	127.8 pcf	2.7
Oily Waste with 2 % Lime and 10% Fly Ash	120.9 pcf	10.4
Oily Waste with 6 % Lime and 22.5 % Fly Ash	115.5 pcf	10.0
Oily Waste with 10 % Lime and 35 % Fly Ash	108.4 pcf	9.3

The test results indicate that the stability of the material can be greatly improved with the addition of minor amounts of lime and fly ash. The stability of the mixture did not improve when larger amounts of lime and fly ash were used.

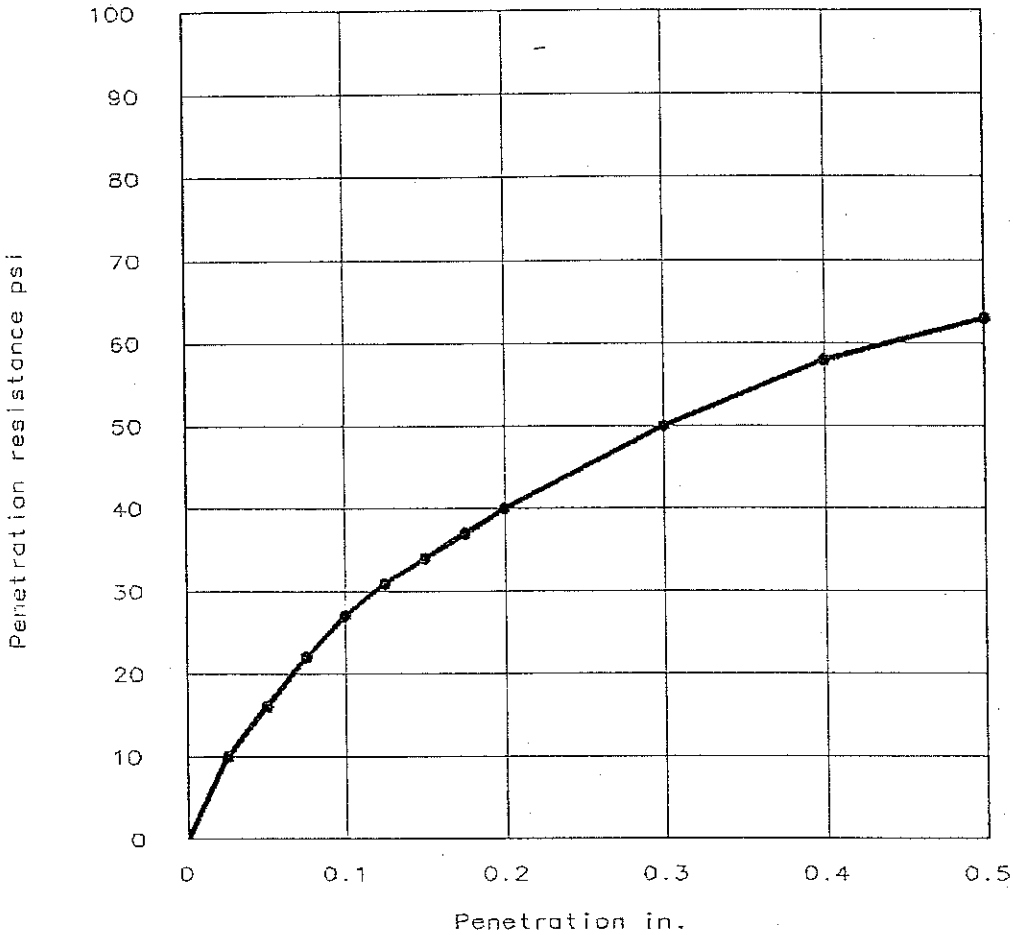
Based on the test results, a properly blended mixture of the oily waste with 2 % lime and 10 % fly ash would be expected to compact readily and be stable under normal construction equipment.

Should you have any questions concerning these test results, please do not hesitate to contact us.

APPLIED CONSTRUCTION TECHNOLOGIES, INC.
by:

Lynton L. Price, P.E.
Director of Engineering

BEARING RATIO TEST REPORT



	Molded			Soaked			CBR (%)		Penet.	Swel
	Dens.	% max	moist	Dens.	% max	moist	0.1"	0.2"	Surcharge	%
1 ●	127.8		3.5%	128.1		4.7%	2.7	2.7	14.93 lbs.	0.0
2 ▲										
3 ■										

MATERIAL DESCRIPTION	USCS	Max. dens.	Opt. w.c.	LL	PI
OILY, CLAYEY GRAVEL & SAND					

Project No: 9705.08
Project: CANTON DROP FORGE
Location: BIOCELL
CLIENT: PARSONS ENGINEERING SCIENCE,INC.
Date: 5/6/97

BEARING RATIO TEST REPORT

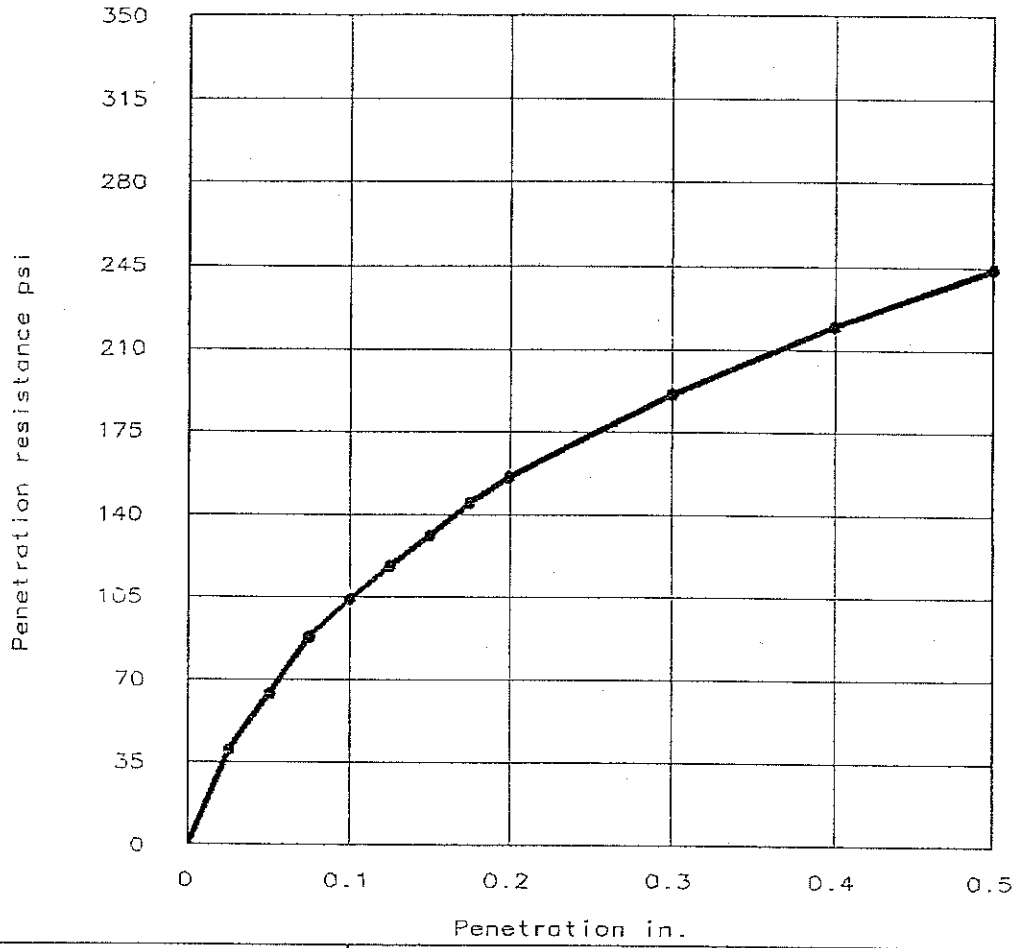
APPLIED CONSTRUCTION TECHNOLOGIES, INC.

Test Descr./Remarks:

BULK SAMPLE
SUBMITTED TO US BY
PARSONS ENGINEERING
SCIENCE ON 4-18-97

Fig. No.

BEARING RATIO TEST REPORT



	Molded			Soaked			CBR (%)		Penet.	Swel
	Dens.	% max	moist	Dens.	% max	moist	0.1"	0.2"	Surcharge	%
1 ●	120.9		5.4%	120.9		7.6%	10.4	10.4	15.07 lbs.	0.4
2 ▲										
3 ■										

MATERIAL DESCRIPTION	USCS	Max. dens.	Opt. w.c.	LL	PI
OILY,CLAYEY GRAVEL&SAND,WTH 10%FLYASH,2%LIME					

Project No: 9705.08
Project: CANTON DROP FORGE
Location: BIOCELL
CLIENT: PARSONS ENGINEERING SCIENCE,INC.
Date: 5-9-97

BEARING RATIO TEST REPORT

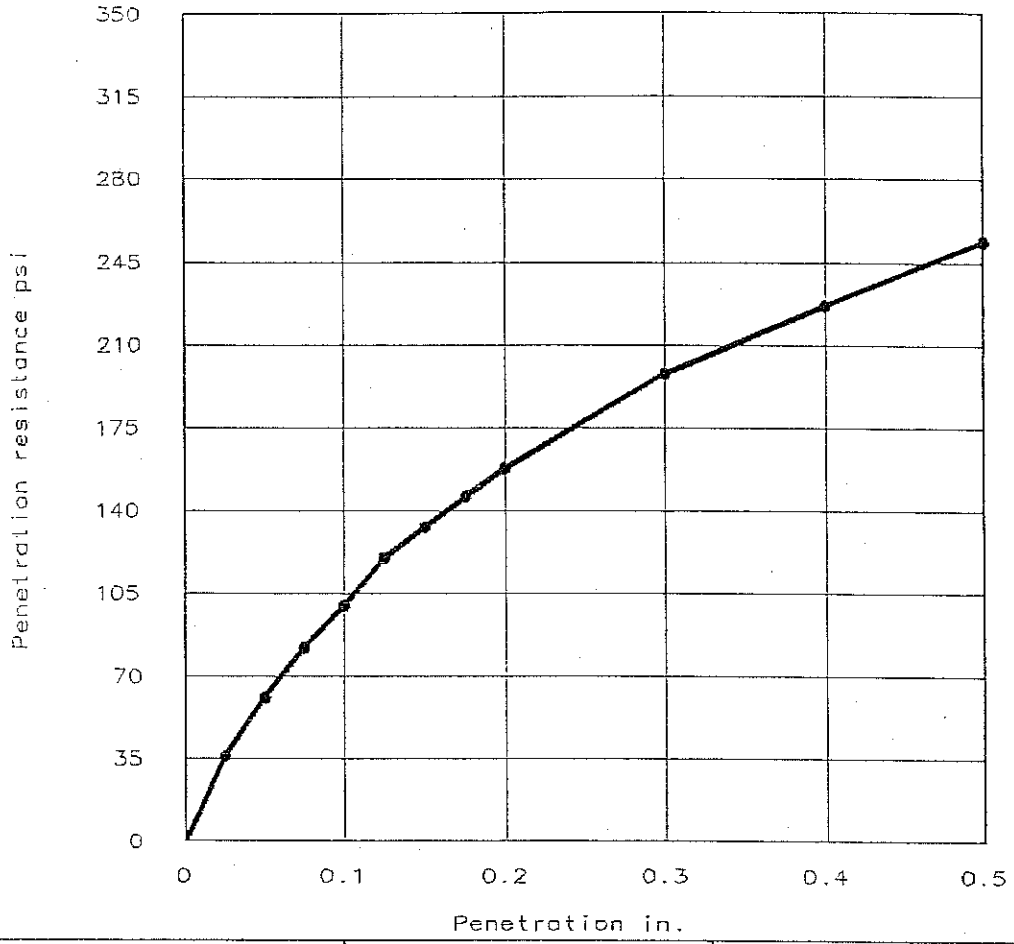
APPLIED CONSTRUCTION TECHNOLOGIES, INC.

Test Descr./Remarks:
ASTM-D 1883

BULK SAMPLE
SUBMITTED TO US BY
PARSONS ENGINEERING
SCIENCE ON 4-18-97

Fig. No.

BEARING RATIO TEST REPORT



	Molded			Soaked			CBR (%)		Penet.	Swel
	Dens.	% max	moist	Dens.	% max	moist	0.1"	0.2"	Surcharge	%
1 ●	115.5		3.2%	114.5		10.1%	10.0	10.5	15.01 lbs.	0.9
2 ▲										
3 ■										

MATERIAL DESCRIPTION	USCS	Max. dens.	Opt. w.c.	LL	PI
OILY,CLAYEY GRAVEL&SAND,WTH22.5%FLYASH6%LIME					

Project No: 9705.08
Project: CANTON DROP FORGE
Location: BIOCELL
CLIENT: PARSONS ENGINEERING SCIENCE,INC.
Date: 5-9-97

BEARING RATIO TEST REPORT

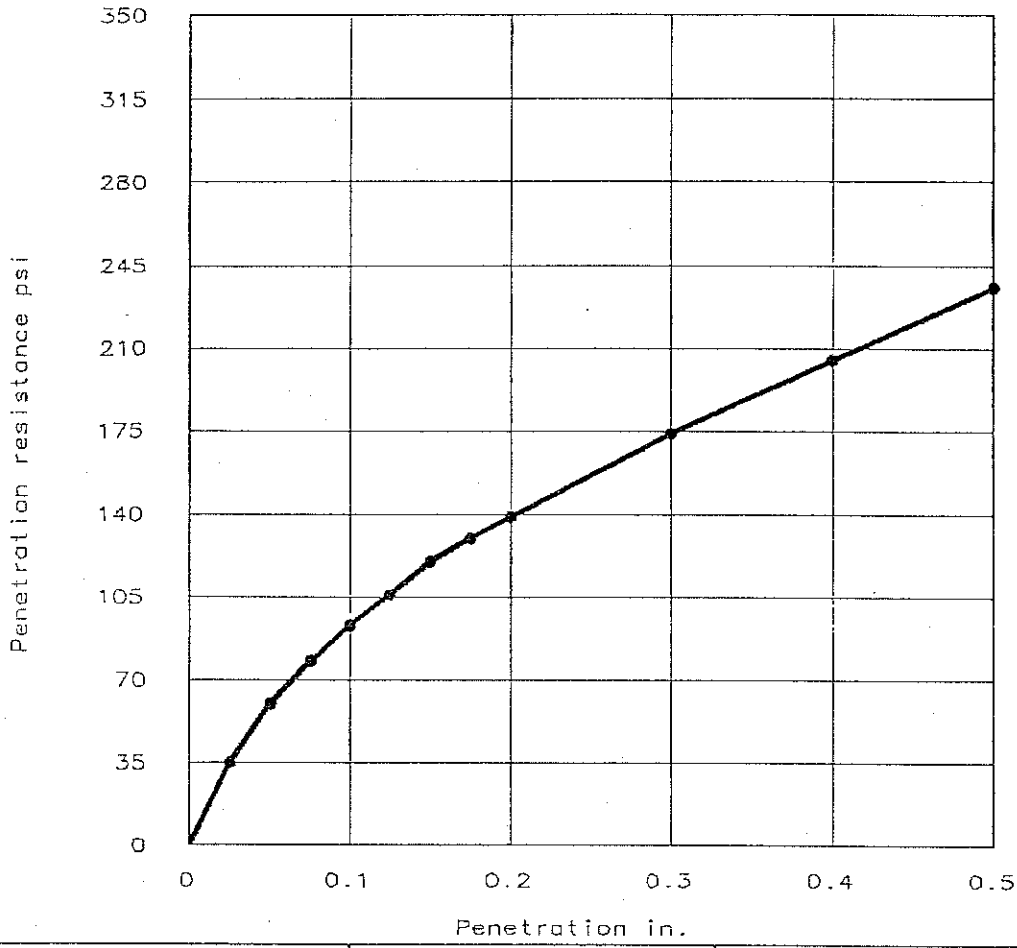
APPLIED CONSTRUCTION TECHNOLOGIES, INC.

Test Descr./Remarks:
ASTM-D 1883

BULK SAMPLE
SUBMITTED BY PARSONS
ENGINEERING SCIENCE
ON 4-18-97

Fig. No.

BEARING RATIO TEST REPORT



	Molded			Soaked			CBR (%)		Penet.	Swel
	Dens.	% max	moist	Dens.	% max	moist	0.1"	0.2"	Surcharge	%
1 ●	108.4		4.1%	107.5		14.1%	9.3	9.3	15.07 lbs.	0.9
2 ▲										
3 ■										

MATERIAL DESCRIPTION	USCS	Max. dens.	Opt. w.c.	LL	PI
OILY,CLAYEY GRAVEL&SAND WTH 35%FLYASH10%LIME					

Project No: 9705.08
Project: CANTON DROP FORGE
Location: BIOCELL
CLIENT: PARSONS ENGINEERING SCIENCE,INC.
Date: 5-9-97

BEARING RATIO TEST REPORT

APPLIED CONSTRUCTION TECHNOLOGIES, INC.

Test Descr./Remarks:
ASTM-D 1883

BULK SAMPLE
SUBMITTED BY PARSONS
ENGINEERING SCIENCE
ON 4-18-97

Fig. No.

APPENDIX C:

CRITERIA FOR SCREENING ALTERNATIVES FOR CANTON DROP FORGE, INC. LAGOON #1 RE-CONSTRUCTION AND BIOCELL DISPOSAL PROJECT

CRITERIA FOR SCREENING ALTERNATIVES FOR CANTON DROP FORGE, INC. LAGOON #1 RE-CONSTRUCTION AND BIOCELL DISPOSAL PROJECT

Described below are the criteria used for screening the six (6) alternatives considered for the CDF Lagoon #1 re-construction and biocell disposal project and their applications in evaluating these options.

Economic Impact

This criterion considers budget-level unit costs of implementing the six alternatives. These analyses take into account the total costs for addressing the Lagoon #1 re-construction and disposal of biocell material, divided by the estimated volume of the biocell (i.e., about 4,500 tons). The calculation also takes into account any credits which may be realized for re-use of the biocell material.

Rating structure
1 is > $50 / ton
2 is $33 to $50 / ton
3 is $25 to $35 / ton
4 is $10 to $25 / ton
5 is $10 / ton

In Option a, costs to test, load, transport, dump (including excise taxes) the biocell material are projected at over $40/ton. Additional expenses are required to reconstruct Lagoon #1, estimated at over $15/ton. (**Note**: this estimate will also be used for Lagoon #1 re-construction in Options b, c, d and e), resulting in a total of over $55/ton.

In Options d and e, costs to test, screen, fluidize (optional only), load, transport and transfer the material are partial offset by the value the receiving facility placed on it. About $40/ton in total costs (including those for Lagoon #1) are partial offset by credits of about $5/ton for recovered hydrocarbon value in Option d and about $15/ton for displaced raw materials needed in Option e.

Please refer to Table 4 for costs estimated for Option f (about $33/ton).

Schedule Impact

This criterion considers the total time, commencing from CDF's authorization, to complete engineering, procurement, permitting (or other third-party approvals), implementation and closure of the alternatives.

Rating structure
1 is > 8 / months
2 is 6 to 8 months
3 is 4 to 6 months
4 is 2 to 4 months
5 is <2 months

It is envisaged that, since Options b, c and f are largely within CDF's control and for Option a significant delays are not anticipated getting landfill approval for disposal of this (previously characterized) non-hazardous material, these actions can be completed within 2 to 4 months. Options d and e are anticipated to require longer periods of time to test, verify quality, get third-party approvals (i.e., from Ashland or asphalt plant) and to fit within their operating schedules. To avoid subsequent re-handling of the material, direct feed to their presses will be required, causing delays in completion.

Technical Feasibility

Technical feasibility takes into account the implementability of the proposed options. The rating is entirely subjective with factors identified regarding the ease or difficulty anticipated.

Rating structure
1 is very difficult to implement
2 is somewhat difficult to implement
3 has neutral difficulty for implementation
4 is reasonably easy to implement
5 is most easily implemented

It is anticipated that Options a, b and f will be reasonably easy to implement. Although there are small risks of failure, these approaches has been completed many times without significant problems. Options c and e have also been attempted before, but the risks of failure (from experience) are higher. For Option c, long-term degradation of the stabilized material may produce undesired results (i.e., leaching and/or structural failure), due to exposure to traffic and the elements. For Option e, difficulty in maintaining stability of the subject material has not been tested and, hence, is uncertain. Option d poses the greatest risks of potential failure, primarily due to the variability in hydrocarbon content, texture, sizing, etc., of the material and the degree of pre-processing which will be required to ensure its satisfactory use in this application. Further consideration of Option d is probably unwarranted.

Stakeholder Acceptance

In this criterion, we attempt to evaluate the acceptability of each option to the myriad of parties which (may) have an interest in this project. The assumed stakeholders are: CDF; regulatory agencies, including Ohio EPA and USEPA; potential customers, including Ashland or the asphalt plant; and neighboring property owners.

Rating structure
1 anticipates potentially insurmountable objectives
2 anticipates some objection
3 is neutral with regards to acceptance
4 is generally acceptable
5 projects complete acceptance

Most of the options (a, b, d and e) are perceived to be neutral with respect to acceptability; there are no known issues or concerns which could prohibit their application. Option c is perceived as potentially less acceptable since the stabilized material will be placed in areas subject to traffic and scrutiny (see also the concern regarding long-term stability). Option f is perceived as the most acceptable in that it permits CDF to address two issues simultaneously (i.e., with one set of actions), does not involve external scrutiny and leaves no biocell material exposed to traffic, the elements or scrutiny.

Permitting Requirements

This assessment addresses the probable need for permits or third-party approvals.

Rating structure	1 anticipates substantial/very difficult requirements
	2 anticipates somewhat difficult requirements
	3 anticipates moderate requirements
	4 anticipates minor requirements
	5 anticipates no permitting required

For Options, c and f, no external approvals or permit requirements are anticipated. For Options a, d and e, third-party approvals are required from the receiving facilities.

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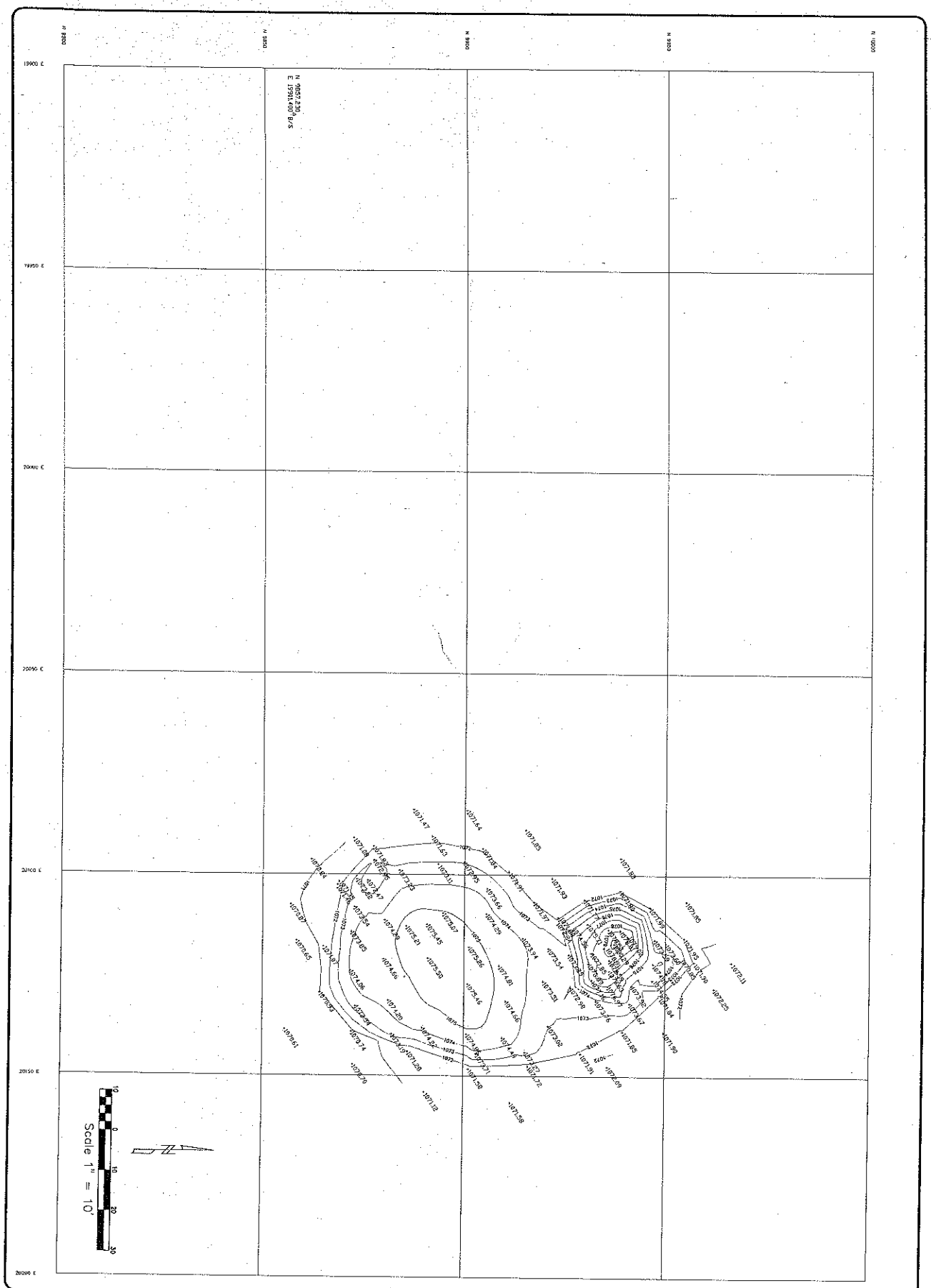

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DRAWN BY DRT	DATE 10/24/97		
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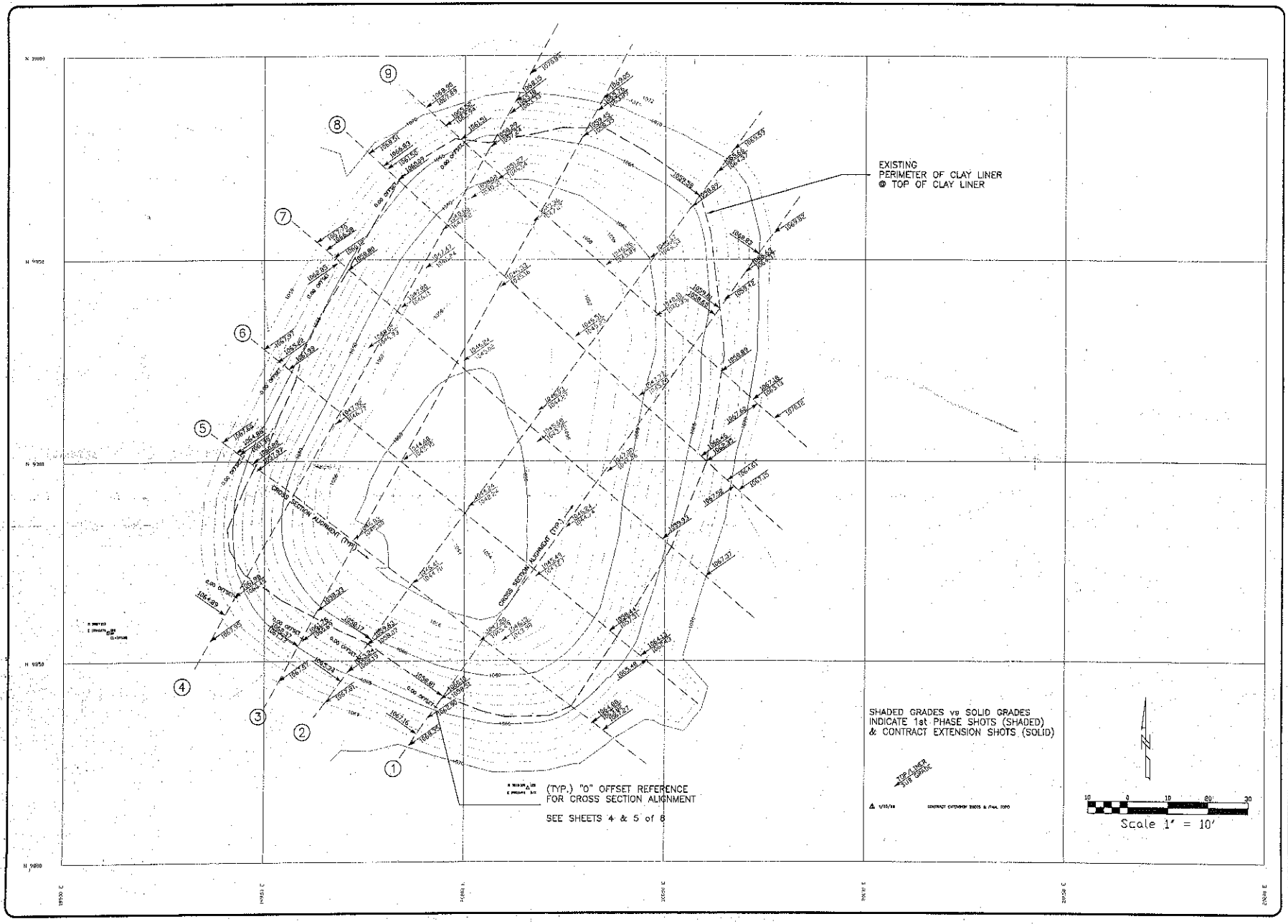
SHEET 8 OF 8			

CANTON DROP FORGE
LAGOON #1
MATERIAL FROM LAGOON, EAST OF LAGOON

THE BEAVER EXCAVATING CO.
4650 SOUTHWAY STREET S.W.
CANTON OHIO 44706
PHONE (330) 478-2151 FAX (330) 478-2122

REVISIONS	
DATE	DESCRIPTION



REVISIONS

#	DATE	DESCRIPTION
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THE BEAVER EXCAVATING CO.
4650 SOUTHWAY STREET S.W.
CANTON OHIO 44706
PHONE (330) 478-2151 FAX (330) 478-2122

CANTON DROP FORGE
LAGOON #1
12" CLAY LINER - SG, TOP/LINER

SURVEYED MJR/ORD/DK	DATE 97 - 98
	SCALE 1" = 10'
DRAWN BY DRT	DATE 1/20/98
JOB #	
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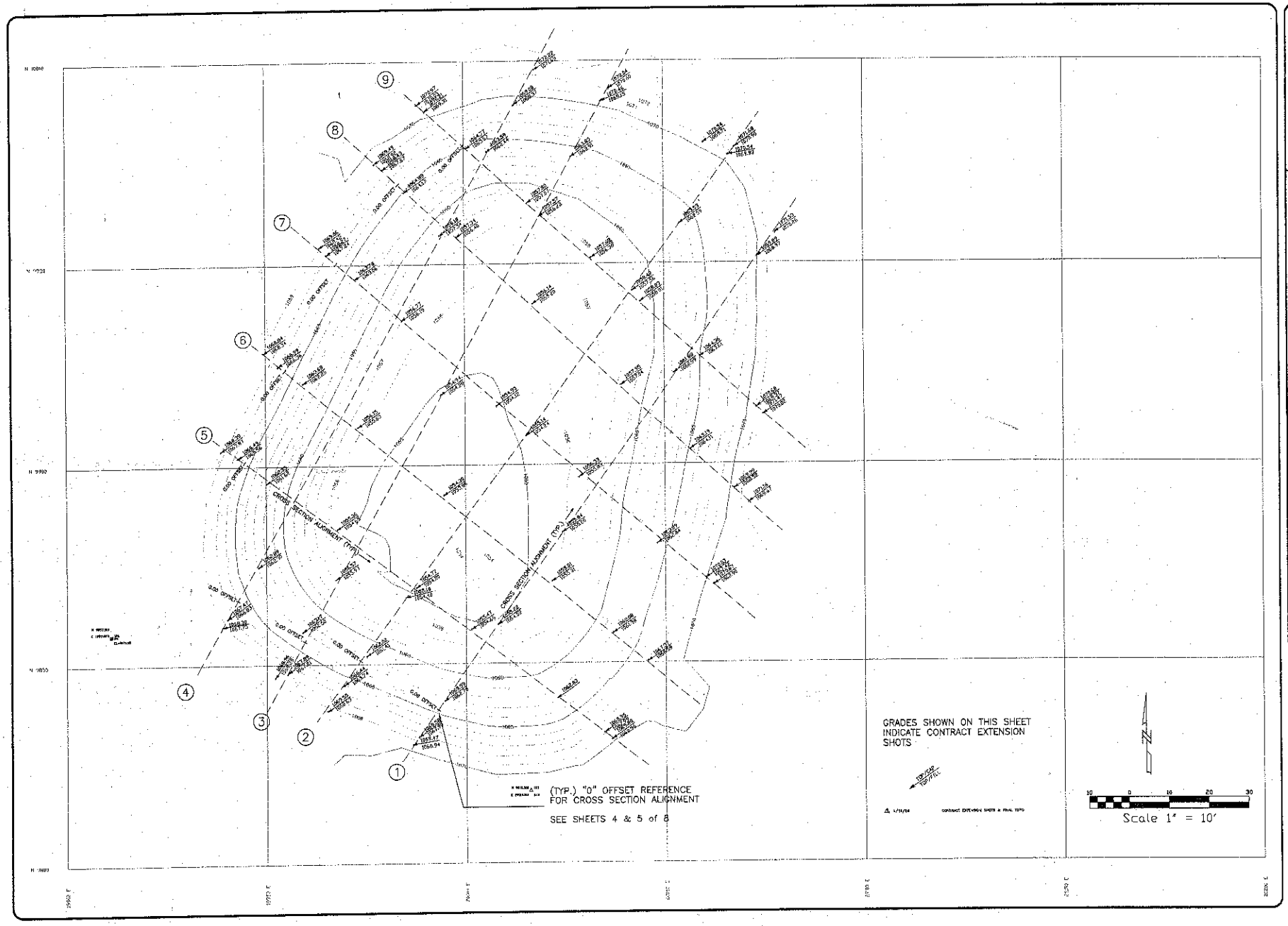
SHEET 2 OF 8



REVISIONS

#	DATE	DESCRIPTION
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THE BEAVER EXCAVATING CO.
4650 SOUTHWAY STREET S.W.
CANTON OHIO 44706
PHONE (330) 478-2151 FAX (330) 478-2122

CANTON DROP FORGE
LAGOON #1
6" CLAY CAP - TOP/FILL, TOP/CAP

SURVEYED N.E.	DATE 12/19/97
	SCALE 1" = 10'
DRAWN BY ORT	DATE 1/19/98
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SHEET 3 OF 8

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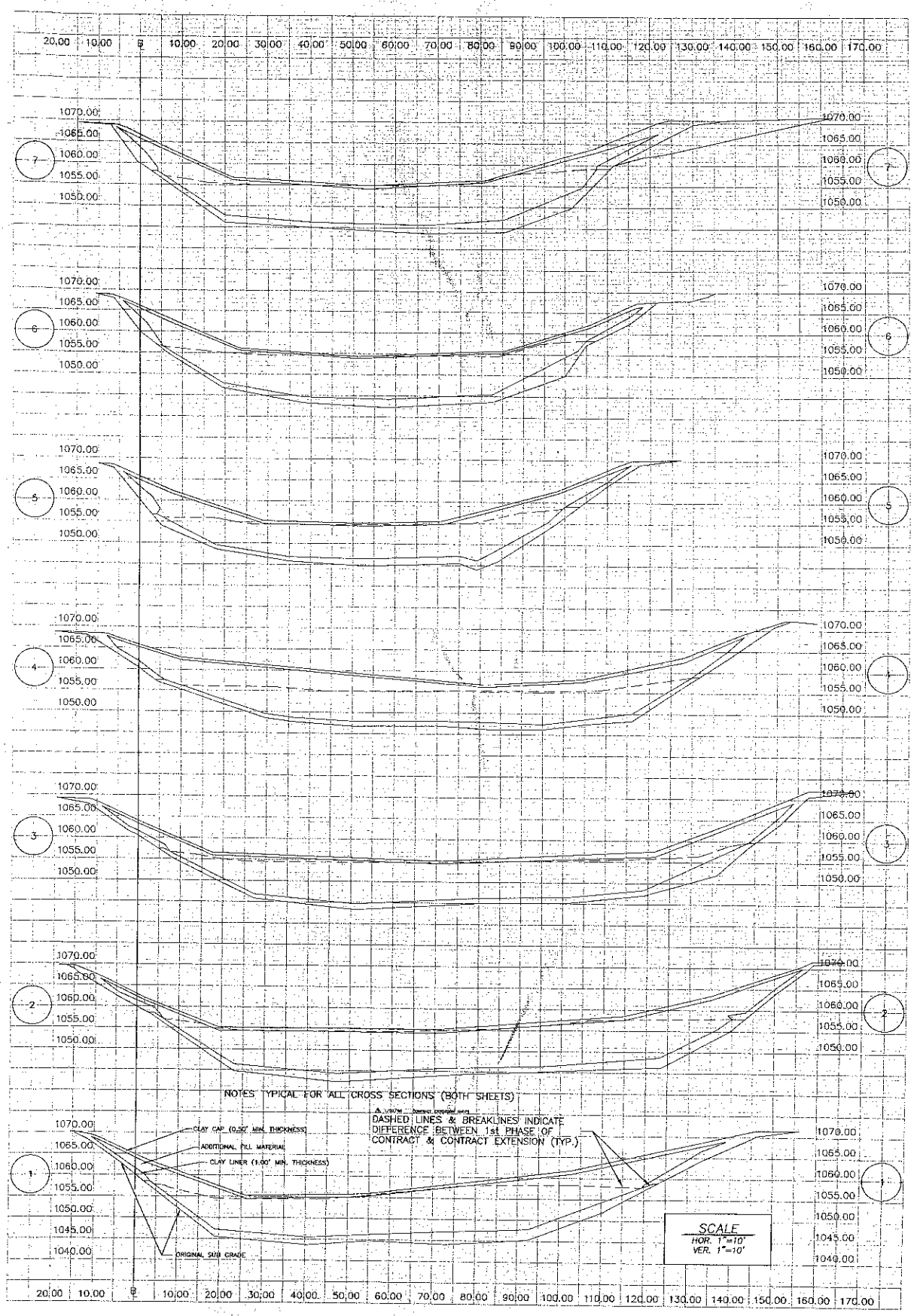

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		DATE: 1/20/98	SURVEYED / DATE

CANTON DROP FORGE
LAGOON #1
AS-BUILT CROSS SECTIONS

THE BEAVER EXCAVATING CO.
4650 SOUTHWAY STREET S.W.
CANTON OHIO 44706
PHONE (330) 478-2151 FAX (330) 478-2122

REVISIONS		
#	DATE	DESCRIPTION
A	1/20/98	CONTRACT EXTENSION 98/078

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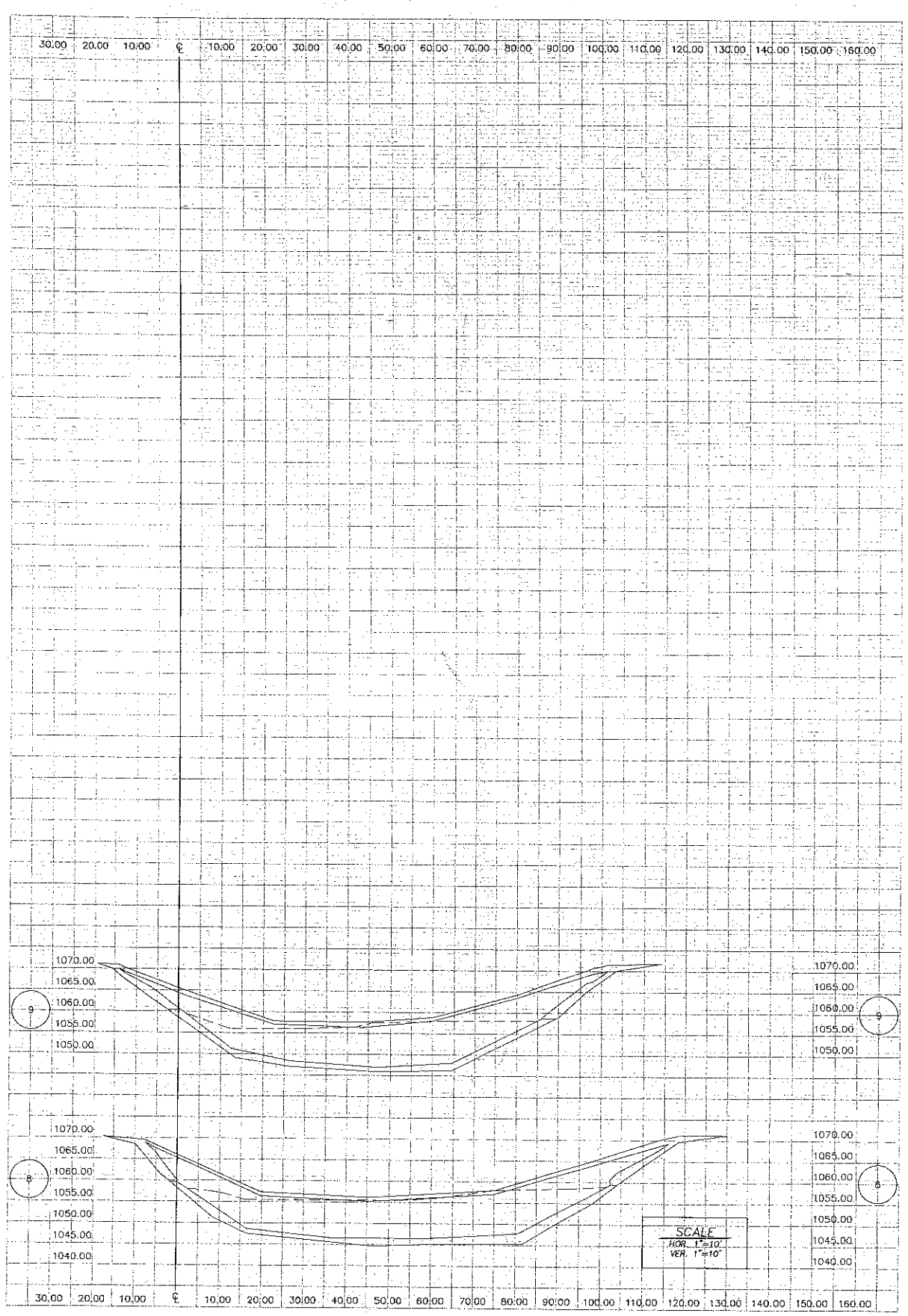

SHEET 5 OF 8

SURVEYED DATE

SCALE VER. 1" = 10' HOR. 1" = 10'

DRAWN BY DATE

DRT 1/20/98

JOB # CAD FILE : RC002001

CANTON DROP FORGE
LAGOON #1
AS-BUILT CROSS SECTIONS

THE BEAVER EXCAVATING CO.
4850 SOUTHWAY STREET S.W.
CANTON OHIO 44706
PHONE (330) 478-2151 FAX (330) 478-2122

REVISIONS

#	DATE	DESCRIPTION
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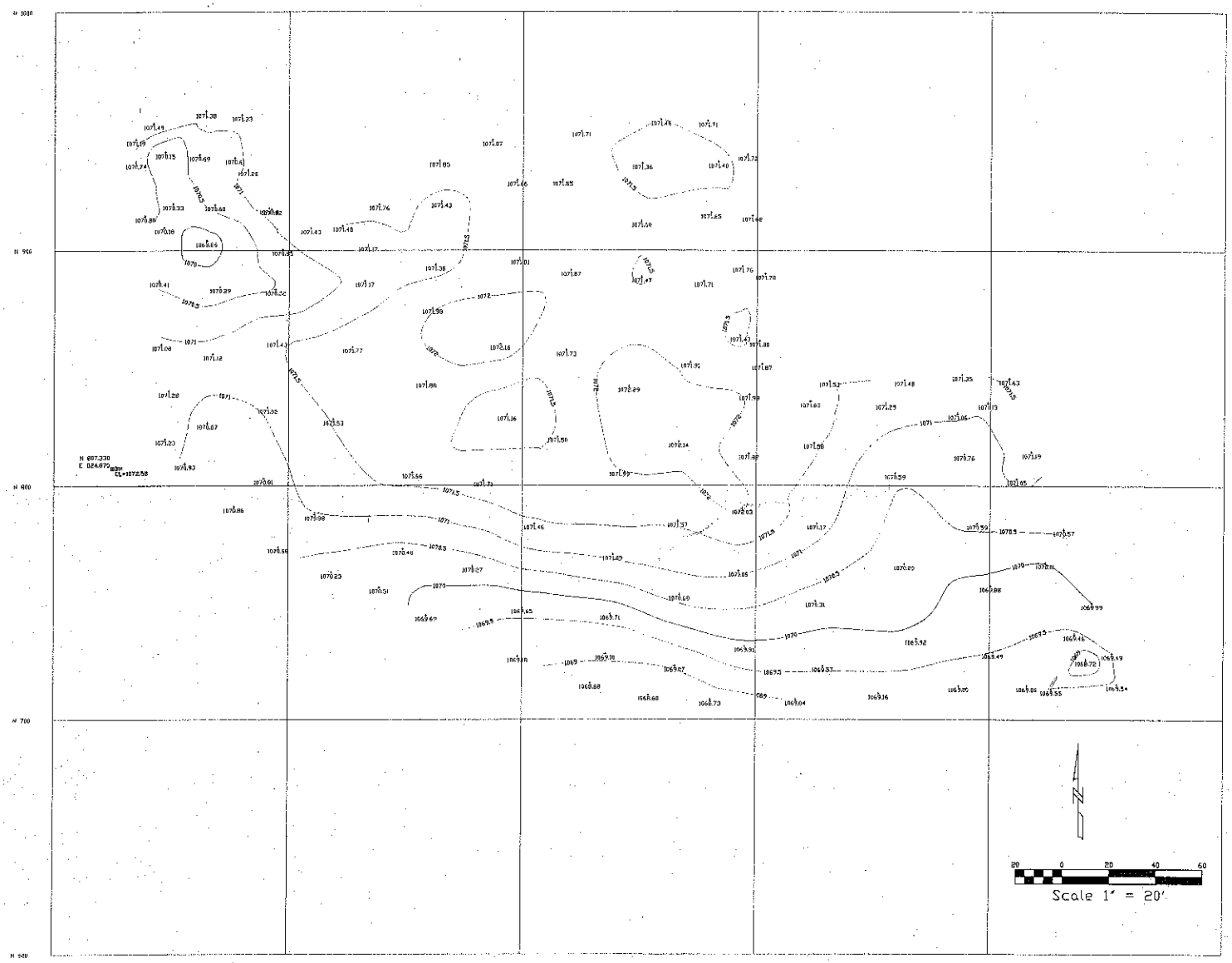

△ 1/22/98 CONTRACT EXTENSION SHEETS & FINAL TOPO

GRADES AFTER REMOVAL OF TREATED MATERIAL DURING CONTRACT EXTENSION

REVISIONS		
#	DATE	DESCRIPTION
△	1/20/98	CONTRACT EXTENSION SHEETS & FINAL TOPO

THE BEAVER EXCAVATING CO.
4650 SOUTHWAY STREET S.W.
CANTON OHIO 44706
PHONE (330) 478-2151 FAX (330) 478-2122

CANTON DROP FORGE
LAGOON #1
BIOCELL - FINAL TOPO

SURVEYED MJB/DK	DATE 12/19/97
	SCALE 1" = 20'
DRAWN BY DRT	DATE 12/24/97
JOB # CAD FILE : FIN_SHT6.DWG	

SHEET 6 OF 8

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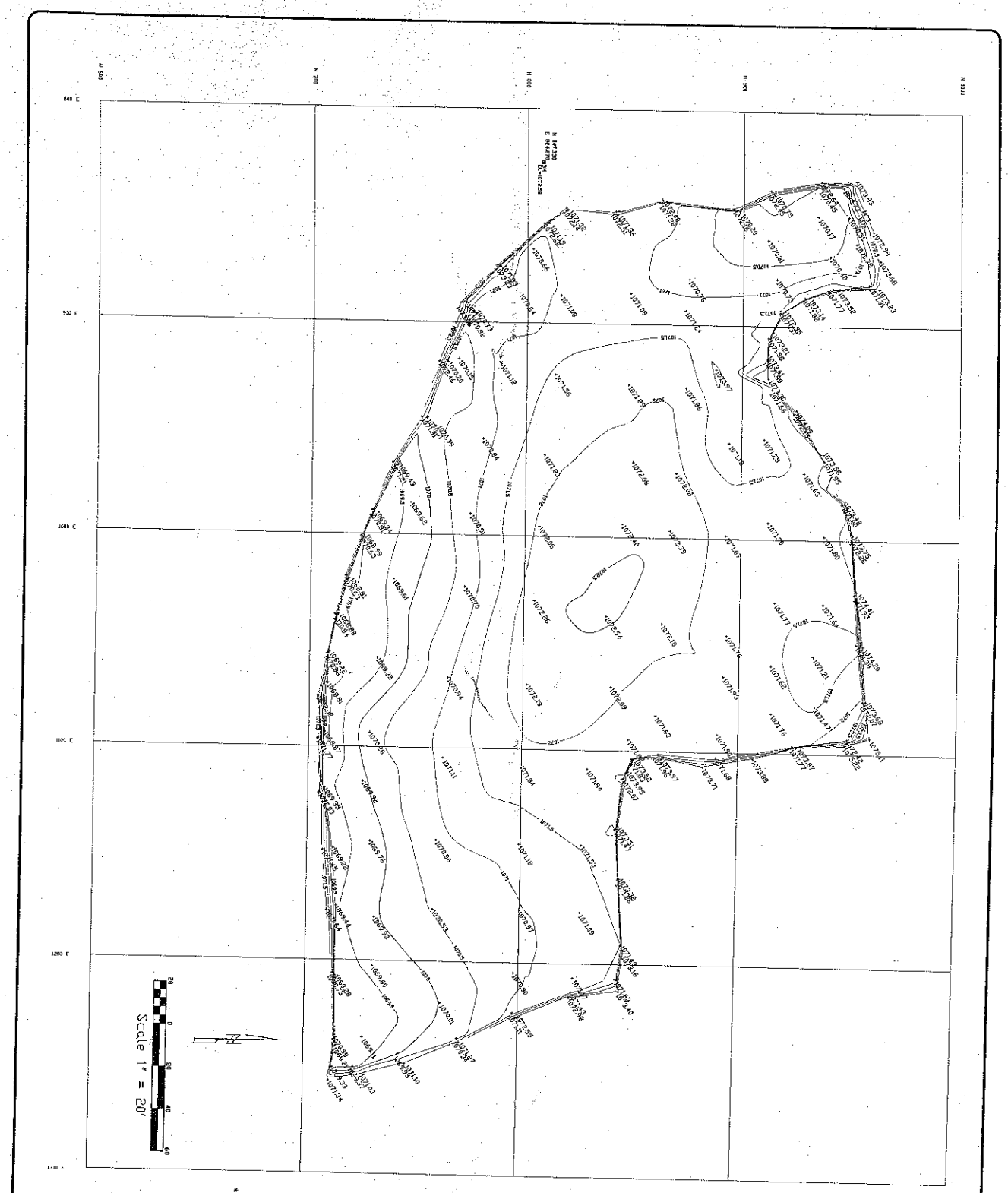

△ 1/23/98 CONTRACT EXTENSION

* GRADES BEFORE CONTRACT EXTENSION WORK BEGAN

SURVEYED	DATE 3/26/97
DRAWN BY	SCALE 1" = 20'
DRT	DATE 10/22/97
JOB # 97080	
CAD FILE : 97078.DWG	

SHEET 7 OF 8

CANTON DROP FORGE
LAGOON #1
BIOCELL – FINAL TOPO *

THE BEAVER EXCAVATING CO.

4650 SOUTHWAY STREET S.W.
CANTON OHIO 44706
PHONE (330) 478-2151 FAX (330) 478-2122

REVISIONS		
#	DATE	DESCRIPTION
△	1/23/98	CONTRACT EXTENSION

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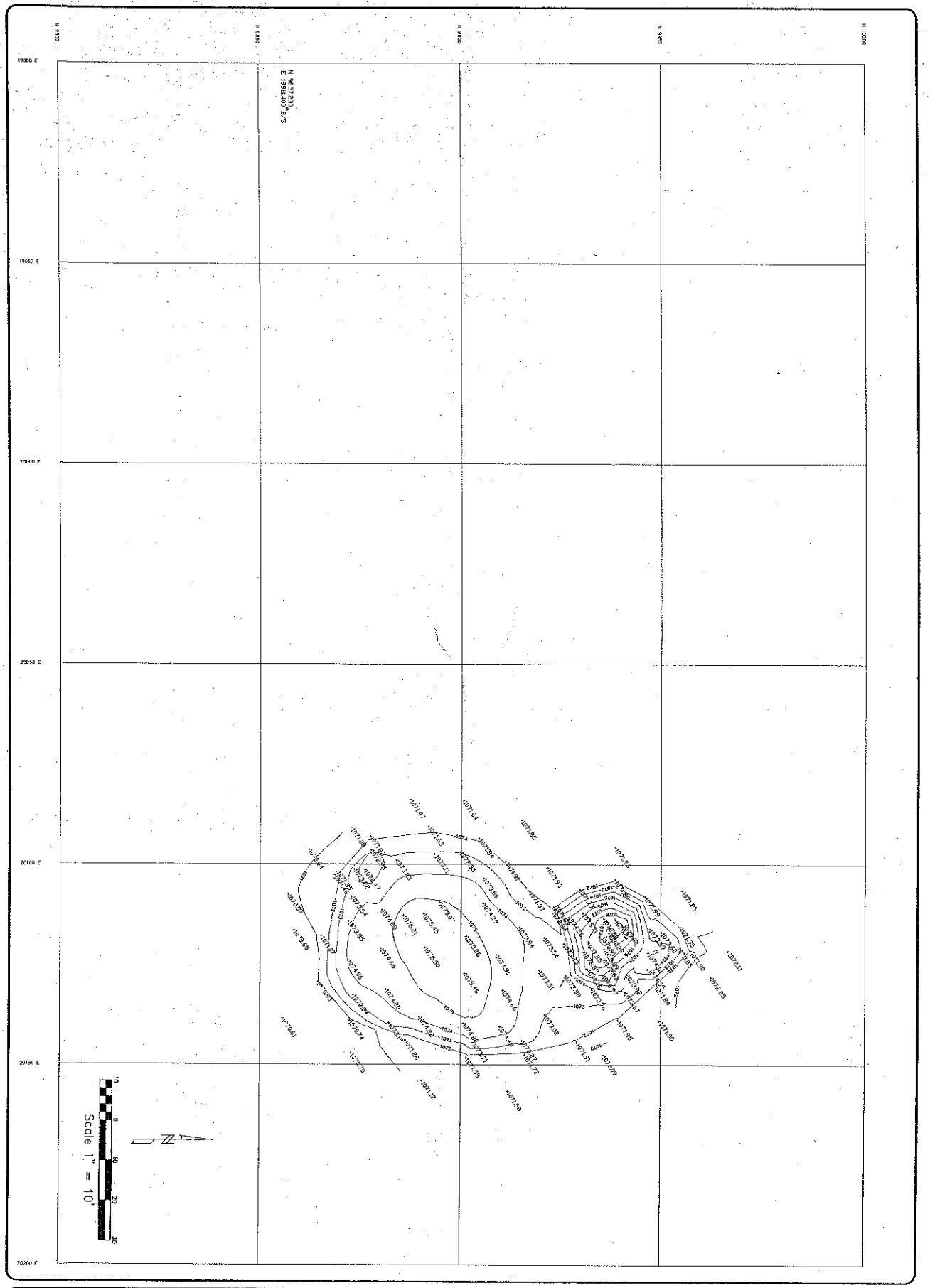

SHEET 8 OF 8	CAD FILE: DROPILE.DWG	JOB # 97063	DRAWN BY DRT
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CANTON DROP FORGE
LAGOON #1
MATERIAL FROM LAGOON, EAST OF LAGOON

THE BEAVER EXCAVATING CO.
4650 SOUTHWAY STREET S.W.
CANTON OHIO 44706
PHONE (330) 478-2151 FAX (330) 478-2122

REVISIONS	
DATE	DESCRIPTION