September 10, 2021

VIA EMAIL: CAWAGNER@IDEM.IN.GOV

Ms. Chrystal Wagner
Self-Disclosure and Environmental Audit Administrator
Indiana Department of Environmental Management
Mail Code 60-02P
100 North Senate Avenue, IGCN 1301
Indianapolis, IN 46204-02251

Re: Self-Disclosure of Potential Violations
Metal Spinners - 914 Wohlert Street, Angola, Indiana, AI ID 115455
Certification of Corrective Action – Solid Waste Profiles

Dear Ms. Wagner:

In connection with the above-referenced Self-Disclosure of Potential Violations (Self-Disclosure), this letter provides our certification that the corrective action for potential violation No. 2, regarding solid waste profiles, has been completed for the Metals Spinners location referenced above.

The Self-Disclosure was submitted to IDEM on July 15, 2021, and under IDEM's Self-Disclosure and Environmental Audit Policy, corrective action must be completed no later than 60 days after the date of disclosure to IDEM, which is September 13, 2021. For the corrective action, updated or new profiles were prepared for certain wastes that had outdated or missing profiles. Copies of these profiles are attached.

Please let me know if you have any questions or require additional information.

Sincerely,

John Lennartz, P.Eng., CEM
Vice President – Environment, Energy & Real Estate
Samuel, Son & Co.

Enclosures

cc: Bruce Kizer
Jason House

Waste Stream Determination Form

Facility Name: Metal Spinners 914 Wohlert St. Angola, IN 46703 | Waste Profile: WH001

Person Completing Form: Mike Winkler EH&S Manager | Date: Sept. 07, 2021

1. Waste process and description

Waste description (including physical description - i.e. liquid, solid, sludge)

Annealing Oven Metal Flakes/Slag

Process generating the waste

Annealing oven

2. Waste Stream Determination

Waste determination is based on:

- ☐ User knowledge (Process evaluation, SDSs, and interview)
- ☑ Waste analysis (List all sampling dates and attach analytical results) — Sample Date: 7/29/2021

Is the waste a "solid waste" according to §261.2? *If no, specify exclusion or exemption by regulatory citation and description:*	☑ Yes	☐ No
Is the solid waste excluded under §261.4 or exempt from regulation as a hazardous waste? *If yes, specify exclusion or exemption by regulatory citation and describe:*	☐ Yes	☑ No
Is the waste a listed hazardous waste? (Detail rationale, as necessary)		
F-Listed per §261.31	☐ Yes	☑ No
K-listed per §261.32	☐ Yes	☑ No
P-listed per §261.33(e)	☐ Yes	☑ No
U-listed per §261.66(f)	☐ Yes	☑ No
If yes to any of the above, describe rational for use of these waste codes:		

Does the SDS, lab anlaysis, or other infromation indicate the waste has any of the following characteristics:

D001	A liquid with flash point of 140 °F or lower, A non-liquid capable of causing fire, An ignitable compressed gas, or Oxidizer?	**Ignitable? >**	☐ Yes ☑ No
D002	A liquid with a pH of 2 or less, A liquid with a pH of 12.5 or greater, or Does the waste corrode steel at a rate greater than 0.25 inches per year at a test temp of 130 degree F?	**Corrosive ? >**	☐ Yes ☑ No
D003	Unstable under normal conditions, Reacts violently with water, Gives off toxic gases, or Capable of detonation or explosion under normal conditions or when heated.	**Reactive ? >**	☐ Yes ☑ No

Is waste characteristically toxic as indicated by a Toxicity Characteristic Leaching Procedure (TCLP) (SW-846 Method 1311) greater than the following?

(Check all that apply (if any))

Metals (mg/L)

- D004 ☐ Arsenic (5.0)
- D005 ☐ Barium (100.0)
- D006 ☐ Cadmium (1.0)
- D007 ☐ Chromium (5.0)
- D008 ☐ Lead (5.0)
- D009 ☐ Mercury (0.2)
- D010 ☐ Selenium (1.0)
- D011 ☐ Silver (5.0)

Volatiles (mg/L)

- D018 ☐ Benzene (0.5)
- D019 ☐ Carbon Tetrachloride (0.5)
- D021 ☐ Chlorobeneze (100.0)
- D022 ☐ Chloroform (6.0)
- D028 ☐ 1,2-Dichloroethane (0.5)
- D029 ☐ 1,1-Dichlorethylene (0.7)
- D035 ☐ Methyl Ethyl Etone (200.0)
- D039 ☐ Tetrachloroethylene (0.7)
- D040 ☐ Trichlorethylene (0.5)
- D043 ☐ Vinyl Chloride (0.2)

Semi-Volatiles (mg/L)

- D023 ☐ o-Cresol (200.0)
- D024 ☐ m-Cresol (200.0)
- D025 ☐ p-Cresol (200.0)
- D026 ☐ Cresol - total (200.0)
- D027 ☐ 1,4-Dichlorobenzene (7.5)
- D030 ☐ 2,4-Dinitrotoluene (0.13)
- D032 ☐ Hexachlorobenzene (0.13)
- D033 ☐ Hexachlorobutadiene (0.5)
- D034 ☐ Hexachloroethane (3.0)
- D036 ☐ Nitrobenzene (2.0)
- D037 ☐ Pentachlorophenol (100.0)
- D038 ☐ Pyridine (5.0)
- D041 ☐ 2,4,5-Trichlorophenol (400.0)
- D042 ☐ 2,4,6-Trichlorophenol (2.0)

Pesticides/Herbicides (mg/L)

- D020 ☐ Chloradane (0.03)
- D012 ☐ Endrin (0.02)
- D031 ☐ Heptachlor + epoxide (0.008)
- D013 ☐ Lindane (0.4)
- D014 ☐ Methoxychlor (10.0)
- D015 ☐ Toxaphene (0.5)
- D016 ☐ 2,4-D (10.0)
- D017 ☐ 2,4,5-TP (Silvex) (1.0)

Is the waste PCB-contaminated? *If yes, verify RCRA status at §261.8. (TSCA regulations may apply.)*	☐ Yes	☑ No

RCRA waste determination

- ☐ Hazardous with waste codes: _____
- ☑ Nonhazardous
- ☐ Exempt because: _____
- ☐ Used Oil
- ☐ Universal waste

Waste Stream Determination Form (continued)

3. Conclusions -

Waste is managed as the following, based upon information in this form:

		Federal Waste Codes:	State Waste Codes *(if applicable)*
☐	Hazardous Waste with:		
☑	Nonhazardous Waste		
☐	Used Oil		
☐	Universal Waste		
	Required labeling:		
☐	Exempt because:		
☐	Other Regulated Waste:		
☐	Empty Container:		

State specific requirements:
(applicable to any of the above characterizations)

4. Waste storage, treatment, and disposal

Specific description of waste management from generation point to final disposition:

slag placed in carbon steel dumpster and recycled

Approximate Generation Rate: ~ 40 lbs/month

Are land disposal restrictions (LDR) applicable? ☐ Yes ☑ No

If yes, specify treatability group:
- ☐ Wastewater
- ☐ Nonwastewater

If LDR standards apply, are UHCs present above treatability standards? ☑ NA ☐ Yes ☐ No
[Only applicable to certain characteristically hazardous waste codes specified by regulation.]

If yes, specify UHCs:

DOT Shipping name:

Non-DOT/Non-RCRA Regulated Solid

IMPORTANT: Attach all supporting documentation (e.g. SDSs, laboratory analysis, generator knowledge, etc.) to this waste stream determination.

Source: McCoy and Associates, Inc., as adapted by Foth Infrastructure & Environment, LLC

Notes:

Review:	Reviewer:		Comments:
	Title:		
	Date:		

Review:	Reviewer:		Comments:
	Title:		
	Date:		

Review:	Reviewer:		Comments:
	Title:		
	Date:		

Clean Harbors Analytical Services
Laboratory Test Report

Report ID

ECL - 210817 - 0959

SAMPLE

Annealing Oven
Metal Flakes

Project: Safety Kleen Fort Wayne : Joe Kahn

Metal Spinners

Contact:

Safety Kleen Fort Wayne
2112 Production Road
Fort Wayne
IN 46808

The laboratory performing the analytical testing is listed below. Samples are tested in "as-received" condition, and the test results relate only to the sample listed above. The laboratory certifies that the generation of all the results contained here-in was performed minimally meeting the quality system of ISO/IEC 17025:2017 and is in compliance with the listed analytical method, except as otherwise noted within this report.

Page numbers and total number of pages are listed on the bottom of each page. Because each page contains information to the sample in-which any part may be significantly relevant to the other parts of this report; this report shall not be reproduced, except in full, without the written approval of the laboratory's management. Reproduction of this report of any kind, except in full, shall invalidate this report's laboratory approval and all data contained therein.

DATA QUALIFIERS:

Data qualifiers may be utilized when reporting test results as an aid to understanding laboratory method limitations. Data qualifications may be in the form of either a report narrative or/and flagged test results. Data qualifier flag definitions are located on the last page of this report. Holding Time and Preservation recommendation excursions will be narrated within the individual test group or on page 2 of this report.

QUESTIONS AND OPINIONS

Questions regarding this report may be made by contacting the Laboratory Director/Manager or your Project Manager.

Approving Authority: _____
August 17, 2021

Client ID: Annealing Oven
Metal Flakes

Lab ID: ECL210928

SDG: ECL2021-505

Sample Receipt Report

Logged In: 8/4/2021 **Received By:** gainesl1

Shipping Container Condition: Good

Chain of Custody Record Present: Yes
COC Complete: Yes
Custody Seals Present: No *(on sample or on shipping container)*
Custody Seals Intact: No

Sample Container Condition: Good
Proper Sample Container: Yes
Sample Label Present: No
Sample Label Complete and Matches COC: No

Sample Received On Ice: No
Temperature: 25.0 deg. C **Thermometer ID:** ECL0003-2-18
Chemically Preserved: No *(documentation review, physical check performed during sample prep if required)*
Within Holding Time: Yes

Sample Receipt Comments: Samples are analyzed on an 'as received' basis. Sample conditions upon arrival such as temperatures and headspace may not be optimal. Deviations from optimal sample conditions, as described by the EPA in SW-846, will be communicated to the customer. Any pH testing done at our lab is outside the bounds of optimal testing; within 15 minutes of the sample being taken.
Sample Collection: 7/29/2021 @ 13:30
Sample Receipt: 8/4/2021 @ 8:15 and @ 11:00

Clean Harbors Analytical Services
Laboratory Test Report

Client ID: Annealing Oven
Metal Flakes

Lab ID: ECL210928

SDG: ECL2021-505

Sample Case Narrative

With any exceptions noted as flags and/or narratives detailed below on this page, standard analytical protocols were followed in the preparation and analysis and no problems related to the reported end test results were encountered or anomalies observed. The sample was analyzed with the intent to achieve a lower limit of Limit of Quantitation (LOQ) sufficient to meet the needs of the intended purpose of the test as understood by the laboratory. In some cases, either due to matrix interference or analytes present at high concentrations, samples may be diluted. For diluted samples or for samples that were received with insufficient amount, the reporting limits (RL) and LOQ are adjusted relative to the dilution volume.

All EPA recommended holding times specified in SW-846 Chapters 3 and 4 were met unless otherwise detailed in the individual sections below.

SAMPLE RECEIPT
The laboratory reports test results in as-received condition. The condition of this sample at time of receipt is detailed in the Sample Receipt Report located on page 2 of this report.

SAMPLE ANALYSIS
As related to the final reported values in this test report, all method and laboratory established quality control criteria were met except as detailed below. If no anomalies are listed it can be assumed that all quality control criteria related to the values presented were in control.

The laboratory establishes limits for sample quality control checks (matrix spike and surrogates) from the laboratory's control samples (LCSs) which utilize a clean control matrix. This allows the user to assess differences between analyte precision and bias in their sample against limits established from a known laboratory control.

EPA-6020

OCER211006 *Other-Narrate

ICV for Ba recovered outside control limits, low. ICB for Ag and Ba recovered outside control limits. MB for Ag and Ba recovered outside control limits, high. Both bracketing CCV s for Ba recovered outside control limits, low. Both bracketing CCBs for Ag and Ba recovered outside control limits, high. LCS data recovered within control limits for all elements.

Clean Harbors Analytical Services
Laboratory Test Report

Client ID: Annealing Oven
Metal Flakes

Lab ID: ECL210928

SDG: ECL2021-505

Metals TCLP ICP-MS - 40CFR261 (Full)
Test Method EPA-6020

Data Set: BA-TCLP-01

Validated: 8/16/2021 by fornoffb

Parameter	CAS	Qual	Result	LLOQ	RL	Test Units	Reg Limits
Arsenic (As)	7440-38-2		ND	0.20	0.20	mg/L TCLP	5.0 mg/L TCLP
Barium (Ba)	7440-39-3		0.273	0.20	0.20	mg/L TCLP	100 mg/L TCLP
Cadmium (Cd)	7440-43-9		ND	0.20	0.20	mg/L TCLP	1.0 mg/L TCLP
Chromium (Cr)	7440-47-3		0.239	0.20	0.20	mg/L TCLP	5.0 mg/L TCLP
Lead (Pb)	7439-92-1		ND	0.20	0.20	mg/L TCLP	5.0 mg/L TCLP
Mercury (Hg)	7439-97-6		ND	0.20	0.20	mg/L TCLP	0.20 mg/L TCLP
Selenium (Se)	7782-49-2		ND	0.20	0.20	mg/L TCLP	1.0 mg/L TCLP
Silver (Ag)	7440-22-4		ND	0.40	0.40	mg/L TCLP	5.0 mg/L TCLP

Prep Method: EPA-3005A

Test Analysis Date: 8/16/21

** END OF TEST GROUP **

All results are reported as being in "as-received" condition and on a wet-weight basis unless otherwise noted.

NOTE: Regulatory limits are provided as a best-faith effort courtesy. The client is solely responsible for ensuring that these limits are correct for their sample.

Clean Harbors Analytical Services
Laboratory Test Report

Client ID: Annealing Oven
Metal Flakes

Lab ID: ECL210928

SDG: ECL2021-505

REPORTING LIMITS AND ACRONYMS

RL Reporting Limit - The lowest level that the laboratory reports down to for that specific test parameter/method combination. The RL is set to be at or above the method detection limit (MDL) as determined in a clean control matrix and is adjusted for dilutions. The RL will match the associated LLOQ if the MDL is not routinely verified. Under NELAP, routine MDL studies are only required when reporting a value below LLOQ. Values reported between the LLOQ and the RL are always considered estimated. RL is not applicable for some tests.

LLOQ Lower Limit of Quantitation - The lowest verified point that a value can be reported that is within a known level of confidence, adjusted for sample digestate/extract dilution. LOQ is not applicable for some tests.

REPORTING FLAGS

B Denotes a sample test result analyte that is above the RL was also found in the associated laboratory method blank at a concentration that was above the RL.

T Denotes that the reported analyte that is at or above the RL was only tentatively identified and not confirmed where the test method requires such confirmation be performed. This code is present because some data clients do not require the laboratory to perform the confirmation in order for the test result to be usable.

ND or < Analyte was not detected at or above the RL.

> Analyte was greater than the reported value.

J Estimated Value - Denotes that the reported analyte that is at or below the RL has an increased level of potential bias.

E Estimated Value - Denotes that a positive numeric value is an estimated value. Used when the reported value is greater than the highest instrument calibration point in the curve or above the instrument's verified upper linear dynamic range.

UJ RL and LLOQ Estimated - Denotes the RL and LOQ has an increased level of potential bias. Used in non-detect values as necessary.

NR Not Run - Denotes that the listed analyte was not run or was not reported.

SURROGATE LIMIT GENERATION

It is important to note that when surrogates are used as part of the test method, statistical control limits (when employed) are derived from the LCS results in an appropriate QC matrix (typically ottawa sand for solid matrix samples, reagent water for aqueous matrix samples, TCLP solution for TCLP extracts, and mineral oil for non-aqueous liquid concentrated waste samples). These limits therefore are representative of the process by which RL and LLOQ are established and verified. This allows the data user to assess matrix effects related to surrogate recovery against a known laboratory control.

**** END OF TEST REPORT ****

SAMPLE CHAIN-OF-CUSTODY RECORD

2021 505

Ship Samples To: Clean Harbors East Corporate Lab
1910 Russell Street
Baltimore, MD 21203
Attn: Sample Receiving
Phone: 410-244-8200

ECL21 0928

Client Name Metal Spinners | Sales Specialist Name Joe Kahn | Branch Name / Number Ft. Wayne / 77FWI

Client Contact Mike Winkler | Sales Specialist Phone 260-740-6488 | Branch Address 2112 Production RD. Ft. Wayne, IN 46808

Client Email M.Kea Winkler@Sanuel.com | Email Address Joseph.Kahn@Safety-Kleen.com

COLLECTION INFORMATION

CHAS Assigned SAMPLE ID #	CLIENT SAMPLE IDENTIFICATION	DATE	TIME	DESCRIPTION OF SAMPLE	NO. OF CONTAINERS & SIZE	SIGNATURE OF COLLECTOR
	Annealing Oven	7-29-21	1:30pm	metal flakes from Annealing oven	1/32 oz	M. [illegible]

ANALYSIS REQUEST (PLACE CHECKS BY TESTS REQUIRED)

_____ Full TCLP + Characteristics (D001 - D043) (SPN 82109, 870813, 870812, 870814, 870815)
_____ Full TCLP (D004 - D043) (SPN 82109)
_____ Full TCLP Minus Pests & Herbs (SPN 82109)
_____ Flashpoint / Ignitability for D001 (SPN 870813)
_____ pH / Corrosivity for D002 (SPN 870812)
_____ Reactivity Screen (Cyanide/Sulfide) D003 (SPN 870814, SPN 870815)
X TCLP Metals Only (SPN 870805)
_____ TCLP Volatiles Only (SPN 870807)
_____ TCLP Semivoa Only - Aqueous or Solid (SPN 870806)
_____ TCLP Semivoa Only - Organics (SPN 870809)
_____ Solvent Screen (SPN 870813, 870805, 870807) (Includes Flashpoint, TCLP Metals & TCLP Volatiles)
_____ TCLP Pesticides (SPN 870810)
_____ TCLP Herbicides (SPN 870811)
_____ PCBs (including wipes) (SPN 870820)
_____ BTEX (SPN 870819)
_____ Heat of Combustion (BTU) (SPN 870822)
_____ % Water by Karl Fischer (SPN 870823)
_____ Total Organic Carbon (TOC) (SPN 870824)
_____ Oil and Grease (HEM) (SPN 870816)
_____ Total Petroleum Hydrocarbons (TPH) (SPN 870817)
_____ Total Organic Halogens (TOX) (SPN 870825)
_____ Gasoline Range Organics (GRO) (SPN 870828)
_____ Diesel Range Organics (DRO) (SPN 870829)
_____ Biochemical Oxygen Demand (BOD) (SPN 870826)
_____ Chemical Oxygen Demand (COD) (SPN 870827)
_____ Specific Gravity/Bulk Density (SPN 870818)
_____ Paint Filter (to determine if liquid or solid) (SPN 870821)

ADDITIONAL TESTING REQUESTS:

SAMPLE TRANSFER RECORD

RELINQUISHED BY	DATE	TIME	RECEIVED BY	DATE	TIME
Joe Kahn	7-30-21	7:30am	[signature]	8/4/2021	11:00

LAB USE ONLY

TEMPERATURE WHEN RECEIVED 23.0°C

SAMPLE KIT OPENED AND CHECKED IN BY Ive Gaines AT 11:00 ON 8/4/2021

Waste Stream Determination Form

Facility Name: Metal Spinners 914 Wohlert St. Angola, IN 46703 | Waste Profile: WH002

Person Completing Form: Mike Winkler EH&S Manager | Date: Sept. 07, 2021

1. Waste process and description

Waste description (including physical description - i.e. liquid, solid, sludge)
Laser Air Filter- Solids

Process generating the waste
Laser Cutting of Metals

2. Waste Stream Determination

Waste determination is based on:

- ☐ User knowledge (Process evaluation, SDSs, and interview)
- ☑ Waste analysis (List all sampling dates and attach analytical results) — Sample Date: 1/23/2017

Is the waste a "solid waste" according to §261.2? *If no, specify exclusion or exemption by regulatory citation and description:*	☑ Yes	☐ No
Is the solid waste excluded under §261.4 or exempt from regulation as a hazardous waste? *If yes, specify exclusion or exemption by regulatory citation and describe:*	☐ Yes	☑ No
Is the waste a listed hazardous waste? (Detail rationale, as necessary)		
F-Listed per §261.31	☐ Yes	☑ No
K-listed per §261.32	☐ Yes	☑ No
P-listed per §261.33(e)	☐ Yes	☑ No
U-listed per §261.66(f)	☐ Yes	☑ No
If yes to any of the above, describe rational for use of these waste codes:		
Does the SDS, lab anlaysis, or other infromation indicate the waste has any of the following characteristics:		
D001 — A liquid with flash point of 140 °F or lower, A non-liquid capable of causing fire, An ignitable compressed gas, or Oxidizer? — **Ignitable?>**	☐ Yes	☑ No
D002 — A liquid with a pH of 2 or less, A liquid with a pH of 12.5 or greater, or Does the waste corrode steel at a rate greater than 0.25 inches per year at a test temp of 130 degree F? — **Corrosive ?>**	☐ Yes	☑ No
D003 — Unstable under normal conditions, Reacts violently with water, Gives off toxic gases, or Capable of detonation or explosion under normal conditions or when heated. — **Reactive ?>**	☐ Yes	☑ No

Is waste characteristically toxic as indicated by a Toxicity Characteristic Leaching Procedure (TCLP) (SW-846 Method 1311) greater than the following?
(Check all that apply (if any))

Metals (mg/L)

- D004 ☐ Arsenic (5.0)
- D005 ☐ Barium (100.0)
- D006 ☐ Cadmium (1.0)
- D007 ☐ Chromium (5.0)
- D008 ☐ Lead (5.0)
- D009 ☐ Mercury (0.2)
- D010 ☐ Selenium (1.0)
- D011 ☐ Silver (5.0)

Volatiles (mg/L)

- D018 ☐ Benzene (0.5)
- D019 ☐ Carbon Tetrachloride (0.5)
- D021 ☐ Chlorobeneze (100.0)
- D022 ☐ Chloroform (6.0)
- D028 ☐ 1,2-Dichloroethane (0.5)
- D029 ☐ 1,1-Dichlorethylene (0.7)
- D035 ☐ Methyl Ethyl Etone (200.0)
- D039 ☐ Tetrachloroethylene (0.7)
- D040 ☐ Trichlorethylene (0.5)
- D043 ☐ Vinyl Chloride (0.2)

Semi-Volatiles (mg/L)

- D023 ☐ o-Cresol (200.0)
- D024 ☐ m-Cresol (200.0)
- D025 ☐ p-Cresol (200.0)
- D026 ☐ Cresol - total (200.0)
- D027 ☐ 1,4-Dichlorobenzene (7.5)
- D030 ☐ 2,4-Dinitrotoluene (0.13)
- D032 ☐ Hexachlorobenzene (0.13)
- D033 ☐ Hexachlorobutadiene (0.5)
- D034 ☐ Hexachloroethane (3.0)
- D036 ☐ Nitrobenzene (2.0)
- D037 ☐ Pentachlorophenol (100.0)
- D038 ☐ Pyridine (5.0)
- D041 ☐ 2,4,5-Trichlorophenol (400.0)
- D042 ☐ 2,4,6-Trichlorophenol (2.0)

Pesticides/Herbicides (mg/L)

- D020 ☐ Chloradane (0.03)
- D012 ☐ Endrin (0.02)
- D031 ☐ Heptachlor + epoxide (0.008)
- D013 ☐ Lindane (0.4)
- D014 ☐ Methoxychlor (10.0)
- D015 ☐ Toxaphene (0.5)
- D016 ☐ 2,4-D (10.0)
- D017 ☐ 2,4,5-TP (Silvex) (1.0)

Is the waste PCB-contaminated? *If yes, verify RCRA status at §261.8. (TSCA regulations may apply.)*	☐ Yes	☑ No

RCRA waste determination

- ☐ Hazardous with waste codes: _____
- ☑ Non hazardous
- ☐ Exempt because: _____
- ☐ Used Oil
- ☐ Universal waste

Waste Stream Determination Form (continued)

3. Conclusions -

Waste is managed as the following, based upon information in this form:

		Federal Waste Codes:	State Waste Codes *(if applicable)*
☐	Hazardous Waste with:		
☑	Non hazardous Waste		
☐	Used Oil		
☐	Universal Waste		
	Required labeling:		
☐	Exempt because:		
☐	Other Regulated Waste:		
☐	Empty Container:		

State specific requirements: *(applicable to any of the above characterizations)*

4. Waste storage, treatment, and disposal

Specific description of waste management from generation point to final disposition:

Recycled by 3rd party

Approximate Generation Rate: Filter Change Every 5 years

Are land disposal restrictions (LDR) applicable?	☐ Yes	☑ No
If yes, specify treatability group: ☐ Wastewater ☐ Nonwastewater		
If LDR standards apply, are UHCs present above treatability standards? *(Only applicable to certain characteristically hazardous waste codes specified by regulation.)*	☑ NA ☐ Yes	☐ No
If yes, specify UHCs:		

DOT Shipping name:

Non-DOT/Non-RCRA Regulated Solid

IMPORTANT: Attach all supporting documentation (e.g. SDSs, laboratory analysis, generator knowledge, etc.) to this waste stream determination.

Source: McCoy and Associates, Inc., as adapted by Foth Infrastructure & Environment, LLC.

Notes: Analysis to be updated once waste is next generated.

Review:	Reviewer:		Comments:
	Title:		
	Date:		

Review:	Reviewer:		Comments:
	Title:		
	Date:		

Review:	Reviewer:		Comments:
	Title:		
	Date:		

element materials technology
Element Materials Technology - Fort Wayne
2121 E. Washington Blvd.
Fort Wayne, IN 46803
TEL: (260) 424-1622 FAX: (260) 424-9124
Website: www.element.com

Analytical Report

(wastewater)

WO#: 17012285

Date Reported **2/3/2017**

CLIENT: Seven Gen
Project: Metal Spinners WW & TCLP
Lab ID: 17012285-002
Client Sample ID Filter Cake
Sample Location:

Collection Date: 1/23/2017 1:00:00 PM
Matrix: SOLID

Analyses	Result	PQL	Qual	Units	DF	PL	Date Analyzed
TCLP METALS MERCURY, TCLP LEACHED				**SW7470A**		**SW1311**	Analyst: FJR
Mercury	< 0.020	0.020		mg/L	1	0.20	2/1/2017 11:36:14 AM
TCLP METALS ICP METALS, TCLP LEACHED				**SW1311/6010C**			Analyst: FJR
Arsenic	< 0.20	0.20		mg/L	1	5.0	1/31/2017 1:28:03 PM
Barium	< 0.10	0.10		mg/L	1	100	1/31/2017 1:28:03 PM
Cadmium	< 0.10	0.10		mg/L	1	1.0	1/31/2017 1:28:03 PM
Chromium	< 0.10	0.10		mg/L	1	5.0	1/31/2017 1:28:03 PM
Lead	< 0.10	0.10		mg/L	1	5.0	1/31/2017 1:28:03 PM
Selenium	< 0.20	0.20		mg/L	1	1.0	1/31/2017 1:28:03 PM
Silver	< 0.10	0.10		mg/L	1	5.0	1/31/2017 1:28:03 PM
ICP METALS, TCLP LEACHED				**SW1311/6010C**			Analyst: FJR
Aluminum	< 0.10	0.10		mg/L	1		1/31/2017 12:00:57 PM

Qualifiers:

H	Holding times for preparation or analysis exceeded
ND	Not Detected at the Reporting Limit
PQL	Practical Quantitation Limit
S	Spike Recovery outside accepted recovery limits
M	Manual Integration used to determine area response
PL	Permit Limit
RL	Reporting Detection Limit