Superfund file
Copy to Kazmierczak

5S-P&TSB-7

APR 30 1987

Mr. Ronald D. Schneider
Manager Manufacturing Engineering
Thomas Industries, Inc.
P.O. Box 29
1419 Illinois Avenue
Sheboygan, Wisconsin 53082

Re: PCB Compliance Inspection

Dear Mr. Schneider:

On March 5, 1986, representatives of the United States Environmental Protection Agency (U.S. EPA) conducted a PCB compliance inspection of Thomas Industries, Inc., 1419 Illinois Avenue, Sheboygan, Wisconsin.

Based upon the data collected during that inspection, the U.S. EPA has determined that no violations of the Federal PCB regulations, 40 CFR Part 761, were evident at the time of inspection.

A copy of the inspection report is enclosed for your information. If you have any questions, please do not hesitate to contact Scott Cooper, at (312) 886-1332.

Sincerely,

John Connell, Chief
PCB Control Section

Enclosure

bcc: PCB Control Section/File (w/o encl.)
PCB Control Section/Cooper (w/o encl.)
Bonnie Eleder, CERLA, 5HE (w/o encl.)
✓Francis J. Trcka, WDNR (w/o encl.)

REPORT ON INSPECTION TO DETERMINE COMPLIANCE WITH THE PCB REGULATIONS

THOMAS INDUSTRIES, INC.
1419 ILLINOIS AVENUE
SHEBOYGAN, WISCONSIN

March 5, 1986

Performed by:

U.S. ENVIRONMENTAL PROTECTION AGENCY
PESTICIDES AND TOXIC SUBSTANCES BRANCH
230 SOUTH DEARBORN STREET
CHICAGO, ILLINOIS 60604

PCB COMPLIANCE INSPECTION REPORT

I. COMPANY IDENTIFICATION

Thomas Industries, Inc.
P.O. Box 29
1419 Illinois Avenue
Sheboygan, Wisconsin 53082
(414) 457-4891

RESPONSIBLE OFFICIAL

Mr. Ronald D. Schneider, Manager Manufacturing Engineering

II. DATE OF INSPECTION

March 5, 1986

III. PARTICIPANTS

THOMAS INDUSTRIES, INC.

Mr. Ronald D. Schneider, Manager Manufacturing Engineering
Mr. Peter J. Ruud, Attorney for Thomas Industries, Inc.

WISCONSIN DEPARTMENT OF NATURAL RESOURCES

Mr. Tom Thoresen

U.S. EPA, REGION V

Ms. Maria White, Environmental Scientist, 5S-P&TSB-7
Mr. Scott Cooper, Environmental Protection Specialist (author) 5S-P&TSB-7

IV. OBJECTIVES

The inspection was conducted to document the facility's handling, storage and disposal practices and to determine its compliance with the PCB Regulations, 40 CFR Part 761, as published in the Federal Register of May 31, 1979, and as amended.

V. COMPANY BACKGROUND

The inspection of Thomas Industries, Inc. for compliance with the PCB regulations under the Toxic Substances Control Act (TSCA) (40 CFR §761 et. seq.) was conducted at the request of the Wisconsin Department of Natural Resources (WDNR) Southeast District Office.

Thomas Industries, Inc. is an aluminum die casting and machining operation which manufactures parts for air compressors, vaccum pumps, and spray equipment. There were a total of 11 aluminum die casting machines and 11 furnaces at this plant. This facility also did some machining of iron castings, which were purchased on the open market. No foundry work, heat treating, or assembly was done at this plant.

Thomas Industries has been at this site since 1954. From 1939 to 1954, Electric Sprayit manufactured lighting equipment out of this plant. According to Mr. Schneider, Electric Sprayit did not do die casting and was probably a fabricating operation. In 1953, Electric Sprayit merged with Moe Light to form Thomas Industries. The plant occupied one square city block and consisted of one building with 100,000 square feet under roof. The general character of this area was mixed residential, commercial light industrial (figures 1 & 2). The outdoor plant property was mostly paved. Thomas Industries had 175 employees at this plant. According to Mr. Schneider, there had been no past purchases of PCBs for use at this facility other than what was contained in PCB capacitors.

VI. INSPECTION SUMMARY

A. Opening Conference

The inspectors met with Mr. Ronald Schneider and Mr. Peter J. Ruud, presented their credentials and explained the purpose of the inspection. The Notice of Inspection (Attachment A) and the TSCA Inspection Confidentiality Notice (Attachment B) were presented and explained.

B. Electrical Equipment

1. Transformers

Thomas Industries does not own fluid filled transformers. According to Mr. Schneider, Thomas Industries has made no past disposals of fluid filled transformers.

During the walking tour of the plant, no fluid filled transformers were encountered.

2. Capacitors

Thomas Industries owned 14 in-service large low voltage PCB capacitors (480V). The 14 PCB capacitors were mounted in electrical cabinets associated with seven of the plant's 11 furnaces.

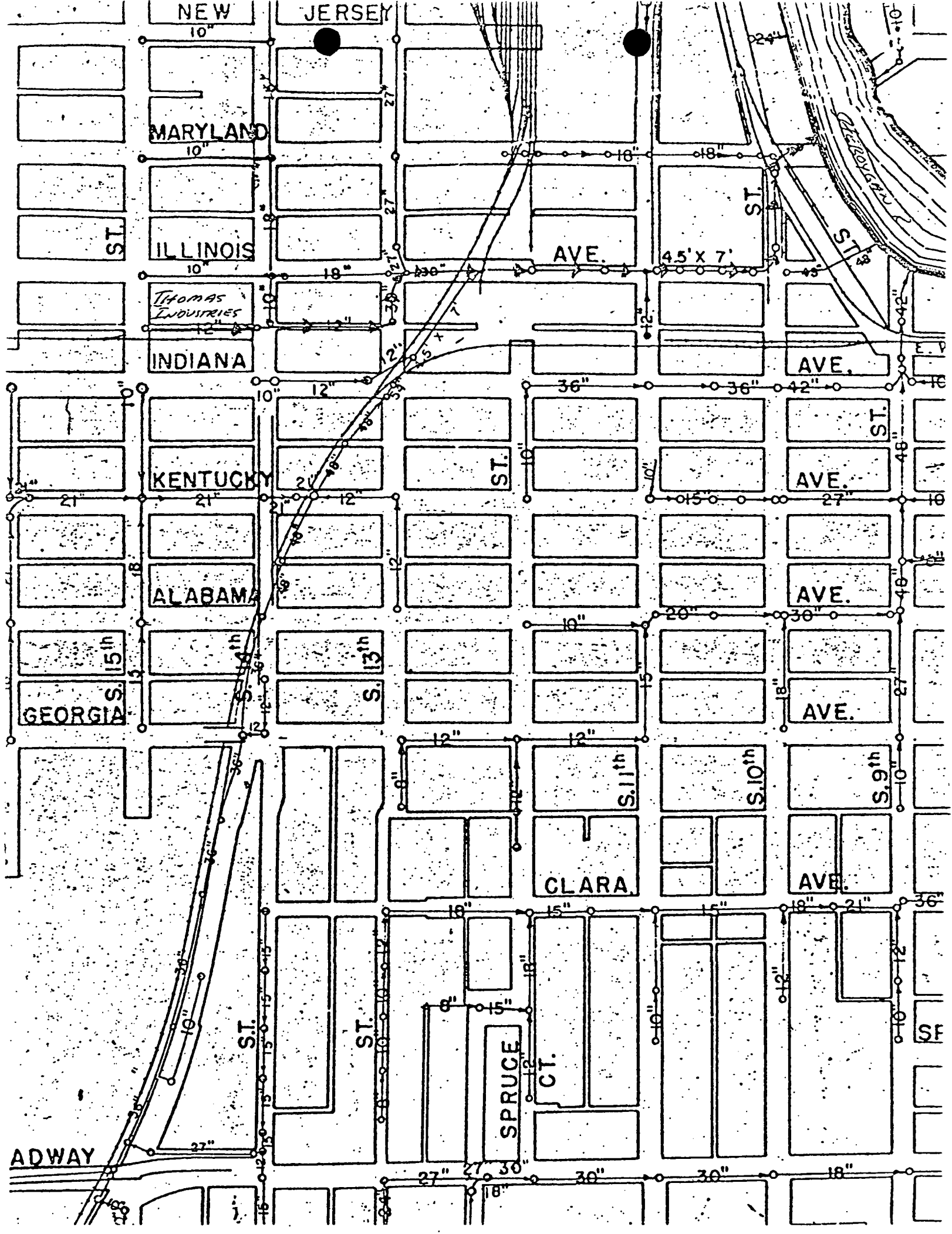
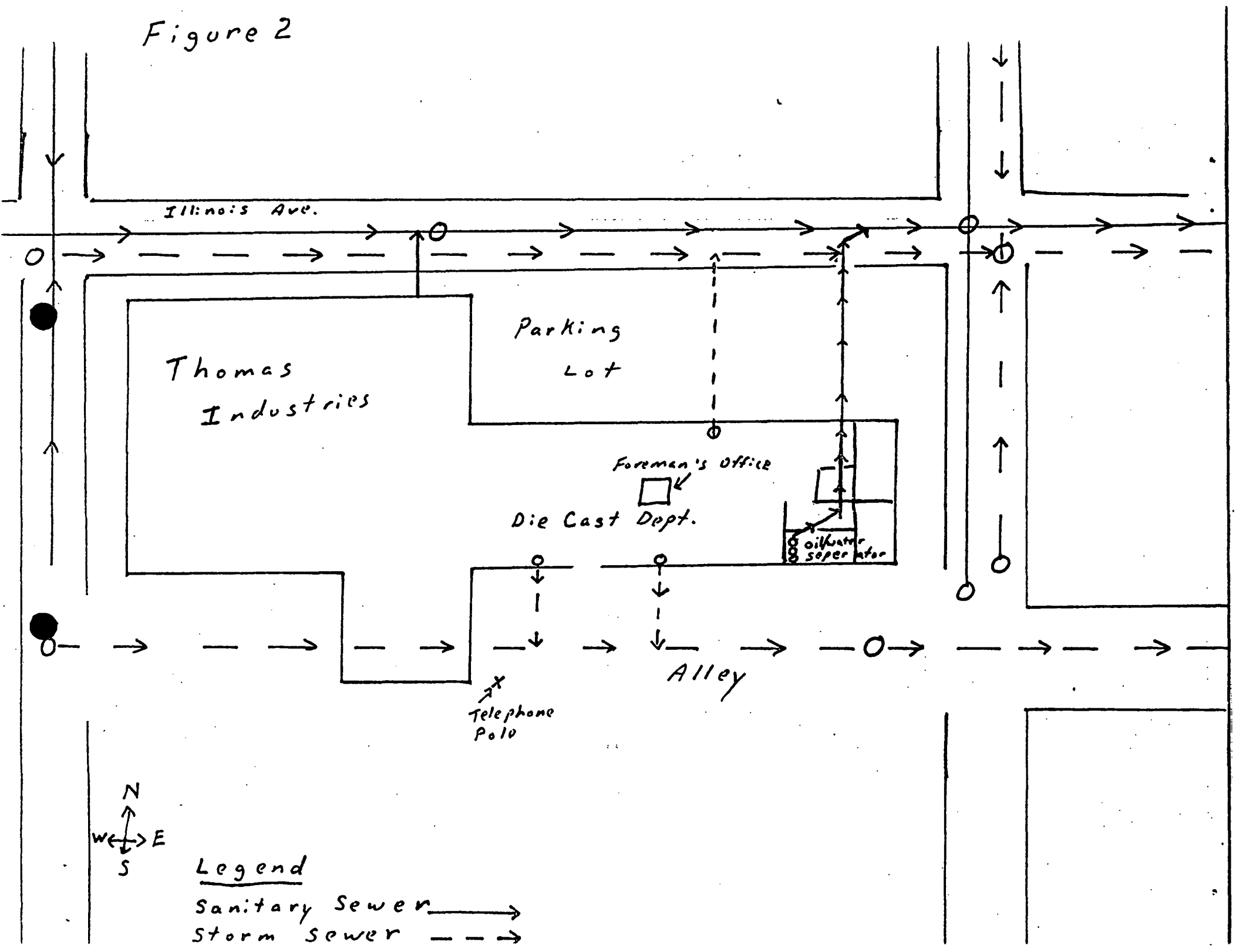

NEW JERSEY
MARYLAND
ILLINOIS
THOMAS INDUSTRIES
INDIANA
KENTUCKY
ALABAMA
GEORGIA
S. 15th
S. 13th
S. 11th
S. 10th
S. 9th
CLARA
SPRUCE
CT.
ST.
AVE.
45' X 7'
ADWAY

Figure 2


Illinois Ave.
Thomas Industries
Parking Lot
Foreman's Office
Die Cast Dept.
oil/water seperator
Alley
Telephone Pole
N
W
E
S
Legend
Sanitary Sewer
Storm Sewer

An examination of the PCB capacitors showed then to be 480 volt. The PCB capacitors were not marked by the M_L label, but both individual PCB capacitors and the electrical cabinets were marked with unofficial labels warning of PCBs. All PCB capacitors were structurally sound.

C. Hydraulic Systems

There were hydraulic systems on each of 11 die casting machines. These were the only hydraulic systems associated with high temperatures. There were also 12 to 15 machine tools with samll hydraulic units, all under 20 gallons. The machine tools used National Oil and Chemical Company Industrial Oil 53 FN 2110.

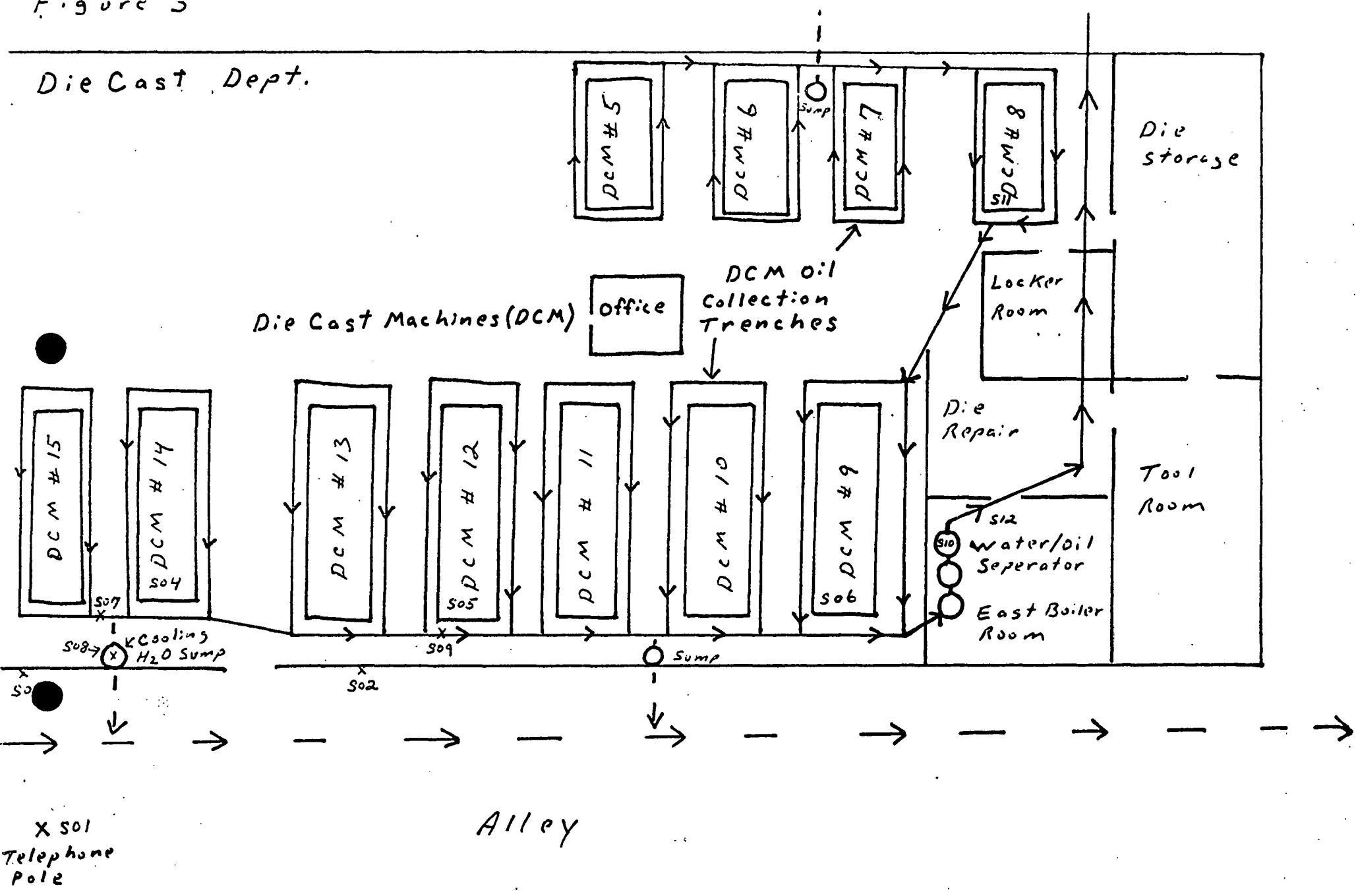
The die cast machine hydraulic units ranged in capacity from 175 to 550 gallons. The age range on these units was from 1961 through 1975. At the time of this inspection, Benzoil Petraulic Sur-Saf FR-AW hydraulic fluid was used in all die cast machines. Up until 4 years ago Chem-Trend HF20 had been used. The plant filters all die cast machine hydraulic fluid once a week. This is done in-house with Thomas Industries' own portable filtering machine. Thomas Industries does not purchase recycled hydraulic fluids. A report dated December 4, 1975, from Swanson Environmental, Inc. of Southfield, Michigan, shows two die cast machines' hydraulic oil having been tested for PCBs (Attachment C). Die cast machines #1 and #5 tested at 4.9 ppm and 2.9 ppm PCBs respectively. No PCB concentration test results were presented for the other die cast machines. According to Mr. Schneider, Thomas Industries has never used PCB hydraulic fluids. By the time of the PCB inspection, die cast machine #1 had been removed from the plant. Mr. Schneider had no information on the disposition of this machine. Mr. Schneider believed there may have been other disposals of die cast machines in the past. He did not have information on how many machines may have been involved, when the disposals took place, or what was their final disposition. However, he was sure no die cast machines had been disposed since 1978.

Samples were taken of hydraulic fluid from four die cast machines (Figure 3), Die cast machine #8 (sample #86TS39S11), machine #9 (sample #86TS39S06), machine #12 (sample #86TS39S05), and machine #14 (sample #86TS39S04) were sampled for the presence of PCBs. Upon analysis, none of these die cast machines showed any detectable levels of PCBs (Attachment D).

D. Drainage and Oil Collection Systems

Each die cast machine is surrounded by a small trench which collects die lube oil and channels it to a three drum cascading oil/water separation system (Figure 4). Fugitive hydraulic oil is collected in drip pans below the die cast machines. Tramp oil is vaccumed up from the floor and, along with hydraulic oil from drip pans, is put into the company's 5,000 gallon waste oil storage tank. The main

Figure 3



X S01
Telephone Pole

N
W E
S

Sanitary Sewer ⟶
Storm Sewer — →
(Sample S13 not shown)

south die cast machine oil trench was sampled at two points (Figure 3). A sample of an oily sludge was taken from the main oil trench at a point between die cast machines #14 and #15 (sample #86TS39S07). A similar sample was taken from the main oil trench at a point across from die cast machine #12 (sample #86TS39S09). Neither of these samples showed the presence of PCBs (Attachment D).

The cascading oil/water separation system was located in the east boiler room and consisted of three 55 gallon drums connected in series (Figure 4). Spent die lube and water enter the first drum and separate hydrostatically. As flow increases, the water passes to the next drum via a subsurface pipe. The process repeats with the third drum discharging water to a sump which discharges to the sanitary sewer along Illinois Avenue. The oil which separates in each of the three drums is skimmed manually and deposited in the plant's 5,000 gallon waste oil storage tank. Thomas Industries has never tested this system for PCBs.

An oil/water sample was taken from the surface of the last drum before discharge to the sump (sample #86TS39S10). The liquid in this drum was a milky white color with the consistency of water. Upon analysis, the sample showed no detectable levels of PCBs (Attachment D). A sample of a muddy material was taken from the floor of the east boiler room (sample #86TS39S12). The floor was wet and had a thin covering of sludge - like material. The sample was taken from beneath the stairs which provided access to the boiler room, and approximately 3 feet from the final separation drum. Under the stairs there was a small drain which connected to the same sanitary sewer discharge line as the oil/water separator sump. Analysis showed this sample to contain 5 ppm PCBs (Attachment D).

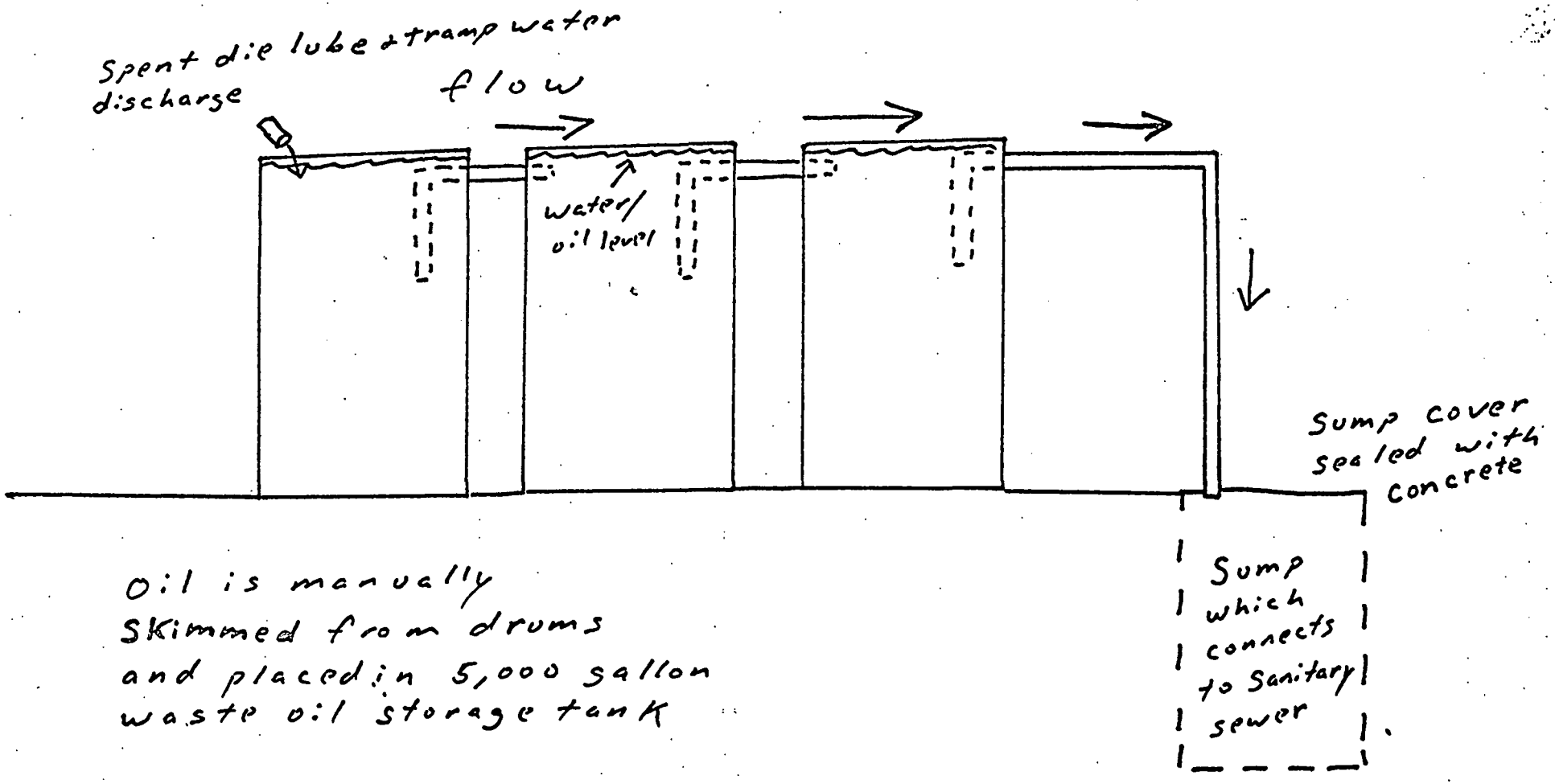
The die cast machines were cooled by a noncontact water cooled system. The 11 die cast machines, by three groupings, discharged their cooling water to one of three collection sumps. The three sumps, in turn, discharged the water to the storm sewers (Figure 3).

A sample of water was taken from the sump between die cast machine #14 and #15 (sample #86TS39S08). Analysis of this sample showed no detectable levels of PCBs (Attachment D).

The 1975 Swanson Environmental, Inc. analysis for PCBs also gave a test result for the cooling water north outfall as nondetectable (Attachment C).

In total, this plant had three feeder discharge lines to storm sewers and two feeder discharge lines to sanitary sewers (Figure 3). There was a sanitary sewer and a storm sewer which ran down Illinois Avenue along the north side of the plant. Thomas Industries had two feeder lines connecting to the Illinois Avenue sanitary sewer and one feeder line, from a die cast cooling water sump, connecting to the Illinois

Figure 4



Oil is manually skimmed from drums and placed in 5,000 gallon waste oil storage tank

Avenue storm sewer. One sanitary connection was from the oil/water separator and locker room area. The other sanitary connection was said to be from the administrative office area. There was a second storm sewer running along the alley on the south side of the plant. This sewer passes beneath a portion of the plant building. Thomas Industries had two feeder lines connecting to this storm sewer from two die cast cooling system sumps.

E. Heat Transfer Systems

There were no oil filled heat exchange systems.

F. Storage

There were no PCBs or PCB Items stored for disposal.

G. Disposal

In March and April of 1984 two shipments for disposal were made containing a total of 15 large low voltage PCB capacitors (480V). Shipping documents were presented. On March 3, 1984, two 55 gallon drums containing PCB capacitors were shipped to Rollins Environmental Services, Deer Park, Texas (Attachment E). On April 19, 1984, a second shipment was made to Rollins comprising three drums of PCB capacitors (Attachment F).

H. Recordkeeping

Recordkeeping was not required of this facility.

I. Waste Oil

There was one 5,000 gallon waste oil storage tank. Waste oil stored in this tank include hydraulic oil, die lube, general lubricating oils, water based cutting fluid, and all other fluid wastes. Thomas Industries does not store waste oil in drums. The plant generates about 5,000 gallons of waste oil per year. The waste oil is shipped to Chem Clear Corp. of Chicago via E & K General Hauling of Sheboygan. Thomas Industries does not purchase recycled oils.

A sample was taken from the waste oil storage tank (sample #86TS39S13). Upon analysis, this sample proved nondetectable for PCBs (Attachment D).

J. Closing Conference

The possible outcomes from a PCB inspection were explained. Mr. Schneider was made aware of the difference between the official PCB M_L label and their in-house PCB label marking the large low voltage PCB capacitors. He was also informed of requirements to mark large low voltage

PCB capacitors with the M_L label at the time of storage for disposal. Mr. Schneider was told the outcome of the PCB inspection would depend on sample results.

VII. SAMPLES

A total of 13 samples for PCBs was taken at Thomas Industries. A description of samples follows:

Sample #	Location/Description	ug/g
86TS39S01	Soil core sample area next to telephone pole (Sample site indicated by WDNR)	1.5
86TS39S02	Wipe sample of stained brick (measuring 8" x 16") outside wall, bottom row, 6 feet 9 inches from the downspout on the eastside of the south door (sample site indicated by WDNR)	390 ug converts to 47.23 ug/100cm^2
86TS39S03	Sludge materials - from crack in outside wall near ground level, next to the downspout west of south door. (Sample site indicated by WDNR)	3.4
86TS39S04	Hydraulic oil from #14 die cast machine tank.	ND
86TS39S05	Hydraulic oil from #12 die cast machine tank.	ND
86TS39S06	Hydraulic oil from #9 die cast machine tank	ND
86TS39S07	Oily sludge - from die cast machine oil collection trench - between die cast machines #14 and #15.	ND
86TS39S08	Water (1 gallon) from die cast machine non-contact water cooling system at collection sump for discharge to storm sewer - between die cast machines #14 and #15.	ND
86TS39S09	Oily sludge - from main collection trench near die cast machine #12.	ND
86TS39S10	Oil/water (1 quart) from surface of last oil/water separation drum, after mixing with a stick.	ND
86TS39S11	Hydraulic oil from #8 die cast machine hydraulic tank.	ND

Sample #	Location/Description	ug/g
86TS39S12	Sludge - floor of oil/water separation area under stairs near floor drain (east boiler room)	5.0
86TS39S13	Oil - from 5,000 gallon waste oil storage tank.	ND

Complete analytical results can be found in Attachment D.

VIII. ATTACHMENTS

A. Notice of Inspection.

B. TSCA Inspection Confidentiality Notice.

C. Swanson Environmental, Inc. Analytical Results.

D. U.S. EPA Analytical Results.

E. Shipping Manifests, 3/3/84.

F. Shipping Manifests, 4/19/84.

G. Receipt for Samples and Documents.

ATTACHMENT A

US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

NOTICE OF INSPECTION

Form Approved
OMB No. 2070-0007
Approval expires 8-31-85

1. INVESTIGATION IDENTIFICATION			2. TIME	3. FIRM NAME
DATE	INSPECTOR NO.	DAILY SEQ. NO.		
3/5/86	4224	01	9:15	Thomas Indostries

4. INSPECTOR ADDRESS	5. FIRM ADDRESS
U.S. EPA, Region V 230 S. Dearborn, 5S-PATSB-7 Chicago, Illinois 60604	1419 Illinois Ave. Sheboygan, WI.

REASON FOR INSPECTION

Under the authority of Section 11 of the Toxic Substances Control Act: PCB Inspection

☒ For the purpose of inspecting (including taking samples, photographs, statements, and other inspection activities) an establishment, facility, or other premises in which chemical substances or mixtures or articles containing same are manufactured, processed or stored, or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) and any conveyance being used to transport chemical substances, mixtures, or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls, and facilities) bearing on whether the requirements of the Act applicable to the chemical substances, mixtures, or articles within or associated with such premises or conveyance have been complied with.

~~☐ In addition, this inspection extends to (Check appropriate blocks):~~

~~☐ A. Financial data~~ ~~☐ D. Production data~~

~~☐ B. Sales data~~ ~~☐ E. Research data~~

~~☐ C. Pricing data~~

~~The nature and extent of inspection of such data specified in A through E above is as follows:~~

INSPECTOR SIGNATURE		RECIPIENT SIGNATURE	
Scott Cooper		Ronald D. Schneider	
NAME		NAME	
Scott Cooper		RONALD D. SCHNEIDER	
TITLE	DATE SIGNED	TITLE	DATE SIGNED
Environmental Protection Specialist	3/5/86	MAINT. MFG. ENGR.	3-5-86

EPA Form 7740-3 (12-82)

INSPECTION FILE

ATTACHMENT B

US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

TSCA INSPECTION CONFIDENTIALITY NOTICE

Form Approved
OMB No. 2070-0007
Approval expires 8-31-85

1. INVESTIGATION IDENTIFICATION			2. FIRM NAME
DATE 3-5-86	INSPECTOR NO. 4224	DAILY SEQ. NO.	Thomas Industries
3. INSPECTOR NAME: Scott Cooper			4. FIRM ADDRESS: 1419 Illinois Ave, Sheboygan, WI.
5. INSPECTOR ADDRESS: U.S. EPA, Region V, 230 S. Dearborn, 5S-PATSB-7, Chicago, Illinois 60604			6. ~~CHIEF EXECUTIVE~~ OFFICER NAME: Ronald D. Schneider
			7. TITLE: Mgr. Manufacturing Engineering

TO ASSERT A CONFIDENTIAL BUSINESS INFORMATION CLAIM

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 USC 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Toxic Substances Control Act (TSCA), Section 14. EPA is required to make inspection data available in response to FOIA requests unless the Administrator of the Agency determines that the data contain information entitled to confidential treatment or may be withheld from release under other exceptions of FOIA.

Any or all the information collected by EPA during the inspection may be claimed confidential if it relates to trade secrets or commercial or financial matters that you consider to be confidential business information. If you assert a CBI claim, EPA will disclose the information only to the extent, and by means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential business information. Among other things, the regulations require that EPA notify you in advance of publicly disclosing any information you have claimed as confidential business information.

A confidential business information (CBI) claim may be asserted at any time. You may assert a CBI claim prior to, during, or after the information is collected. The declaration form was developed by the Agency to assist you in asserting a CBI claim. If it is more convenient for you to assert a CBI claim on your own stationery or by marking the individual documents or samples "TSCA confidential business information," it is not necessary for you to use this form. The inspector will be glad to answer any questions you may have regarding the Agency's CBI procedures.

While you may claim any collected information or sample as confidential business information, such claims are unlikely to be upheld if they are challenged unless the information meets the following criteria:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time, you may make claims that some or all of the information is confidential business information.

If you are not authorized by your company to assert a CBI claim, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials to the Chief Executive Officer of your firm within 2 days of this date. The Chief Executive Officer must return a statement specifying any information which should receive confidential treatment.

The statement from the Chief Executive Officer should be addressed to: MS. Marion Young, DCO. U.S. EPA, Region V, 230 S. Dearborn, 5S-PATSB-7, Chicago, Illinois 60604

and mailed by registered, return-receipt requested mail within 7 calendar days of receipt of this Notice. Claims may be made any time after the inspection, but inspection data will not be entered into the special security system for TSCA confidential business information until an official confidentiality claim is made. The data will be handled under the agency's routine security system unless and until a claim is made.

TO BE COMPLETED BY FACILITY OFFICIAL RECEIVING THIS NOTICE:		If there is no one on the premises of the facility who is authorized to make business confidentiality claims for the firm, a copy of this Notice and other inspection materials will be sent to the company's chief executive officer. If there is another company official who should also receive this information, please designate below.
I have received and read the notice		
SIGNATURE: Ronald D. Schneider		NAME
NAME: RONALD D. SCHNEIDER		TITLE
TITLE: MANG. MFG. ENGR.	DATE SIGNED: 3-5-86	ADDRESS

EPA Form 7740-4 (12-82)

ATTACHMENT C

swanson environmental, inc.
24680 Swanson Road
Southfield, Michigan 48076
P. O. Box 735
Sheboygan, Wisconsin 53081
Telephone (313) 352-0960

December 4, 1975

Mr. Henry Holmer
Manager, Manufacturing Engineering
Thomas Industries, Inc.
1419 Illinois Avenue
Sheboygan, Wisconsin 53081

Dear Mr. Holmer:

Enclosed are the results of the analyses for polychlorinated biphenyls (PCBs) on two water samples, and two hydraulic oils collected at Thomas Industries, Inc.

Sample Description	Concentration*
Cooling water, north outfall	< 0.002 = 2 PPB
Sanitary sewer #1	0.053 = 53 "
#1 Machine oil	4.9 = 4,900 "
#5 Machine oil, Clamp end	2.9 = 2,900 "

* all concentrations are in mg./l.= ppm.

Monsanto Arochlor 1248 was used as the standard for all the reported analyses. The detection limits for PCBs in water is 0.002 mg./l.

If you have any questions regarding these analyses, or would like to discuss PCBs is general, please feel free to give us a call.

Sincerely yours,

SWANSON ENVIRONMENTAL, INC.

Richard S. Krouse

Richard S. Krouse
Sales Engineer

RSK/kr

Chicago, Illinois — Telephone (312) 372-5493
Sheboygan, Wisconsin — Telephone (414) 458-0502

EXHIBIT 24

ATTACHMENT D

ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF ENFORCEMENT
NATIONAL ENFORCEMENT INVESTIGATIONS CENTER
BUILDING 53, BOX 25227, DENVER FEDERAL CENTER
DENVER, COLORADO 80225

TO : Dean F. Hill

DATE: September 16, 1986

FROM : Art Palomares KW for Art Palomares

3056

SUBJECT: Results of PCB Analysis of Samples from Thomas Industries, Sheboygan, WI

On March 20, 1986 thirteen samples were received under official custody seal from Region 5. These samples were from Thomas Industries, Sheboygan, WI and their project number was 86TS39. Analysis was requested for polychlorinated biphenyls (PCBs).

Four out of thirteen samples contained detectable levels of PCBs. The results are given below.

Sample Number	Tag Number	Type of Sample	Concentration or Amount of Total PCBs, ug/g	Major Aroclors Present
S01	5-47029	Soil	1.5	1242, 1254
S02	5-47028	Wipe	390 ug	1254
S03	5-47025	Sludge	3.4	1242, 1254
S04	5-47030	Oil	ND	---
S05	5-47026	Oil	ND	---
S06	5-47027	Oil	ND	---
S07	5-47325	Oil	ND	---
S08	5-47009	Water	ND	---
S09	5-47043	Oil	ND	---
S010	5-47343	Water	ND	---
S011	5-47031	Oil	ND	---
S012	5-47017	Soil	5.0	1242, 1254
S013	5-47018	Oil	ND	---

ND = None detected

The detection limit for the water and oil samples was 1 ug/g.

The soil results are given on a dry weight basis.

The water sample was extracted with hexane, and the extract cleaned with sulfuric acid. The wipe sample was extracted with hexane and the oil samples were diluted in hexane which was then cleaned with sulfuric acid and analyzed by electron-capture gas chromatography. The soil samples were thoroughly mixed and a portion was removed for moisture content analysis. A separate portion was extracted into hexane/acetone which was washed with water to remove the acetone. The hexane was cleaned with sulfuric acid and analyzed by electron-capture gas chromatography.

Copy Done 10-2-86 MY

An oil, two water, a soil and a wipe blank were received and analyzed with the samples and none contained any significant interferences. Samples S01 and S09 were spiked with 50 ug/g and 25 ug/g of Aroclor 1260 and 1242, respectively and the recoveries were 95% and 105%, respectively. Sample S01 was analyzed in duplicate with the following result.

Sample Number	Concentration of Total PCBs, ug/g		
	Result #1	Result #2	Average
S01	1.3	1.7	1.5

ATTACHMENT E

Texas Department of Water Resources
P.O. Box 13087, Capitol Station
Austin, Texas 78711

Ticket No. 00801264

T07

TEXAS WASTE SHIPPING—CONTROL TICKET

(Please Type or Print Clearly)

(Satisfies TDWR, TDH, U.S. DOT and U.S. EPA requirements for hazardous or class I waste manifest)

PART I: To be completed by Generator (see reverse side for instructions)

Company Name: THOMAS INDUSTRIES INC.
TDWR/TDH Registration No.: 99955
Business Address: 1419 ILLINOIS AVE, SHEBOYGAN WI.
EPA Gen. #: WID006100887
Address From Which Shipment Originates: 1419 ILLINOIS AVE, SHEBOYGAN, WI 53081
Emergency Phone A/C: 414-457-4891

DESTINATION: (TEXAS)
TDWR/TDH Permit No.: 01429
Primary TSD Facility Name: ROLLINS ENVIRONMENTAL SERVICES
Business Address: P.O. BOX 609, 2027 BATTLEGROUND ROAD
EPA TSD Fac. #: TXD055141378
Destination (Site) Address: DEER PARK, TEXAS 77536
Phone A/C:

Alternate TSD Facility Name: N/A
TDWR/TDH Permit No.: N/A
Business Address:
EPA TSD Fac. #:
Destination (Site) Address:
Phone A/C:

1. US DOT PROPER SHIPPING NAME	2. US DOT HAZARD CLASS	3. UN/NA NUMBER	4. QUANTITY	UNITS*	5. CONTAINER NO.	TYPE	6. TEXAS WASTE CODE
POLYCHLORINATED BIPHENYL	ORM E	UN2315	2	1 2 3 (4)	2	17-E	171890
—	~~ORM~~			1 2 3 4			
				1 2 3 4			
				1 2 3 4			
				1 2 3 4			
				1 2 3 4			
				1 2 3 4			

*Circle one: (1) tons (2) gallons (3) cubic yards (4) drums (55 gal.)

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, TDWR, and TDH.

Date of Shipment: 3-3-84
Sig. of Authorized Agent: Randolph P. Hulsebus

PART II: To be completed by the Transporter/Driver (see reverse side for instructions)

Transporter: ROLLINS ENVIRONMENTAL SERVICE (TEXAS)
TDWR/TDH Trans. No.: 01429
Business Address: P.O. BOX 609, DEER PARK, TEXAS 77536
EPA Trans. No.: TXD055141378
Phone Number A/C: 713-479-6001
Date Received: 3-3-84

I certify (or declare) that the materials in the quantities described above are received by me for shipment to the above named destination.

BL# 59518

Sig. of Authorized Agent: Frank B Turner

PART III: To Be completed by Treatment, Storage and Disposal (TSD) Facility Owner/Operator (see reverse side for instructions)

TDWR/TDH Permit No.: 01429

TSD Facility Name: Rollins Environmental Services, (Tx) Inc.
Phone Number: 713-479-6001
EPA TSD Fac. No.: TXD055141378
Site Address: 2027 Battleground Road
TSD Facility Owner/Operator Comments: Deer Park, Texas 77536
Date Received: 3-5-84

I certify (or declare) that the materials in the quantities described in Part I are received by me.

Sig. of Authorized Agent: Sue Stendall

White - Original Pink - TSD Facility Yellow - Transporter Green - Generator's First Copy

TDWR-0311 (Rev. 5-29-81)

STATE OF WISCONSIN
DEPARTMENT OF NATURAL RESOURCES
BOX 7921
MADISON, WISCONSIN 53707

PCB WASTE TRACKING FORM

PURSUANT TO SECTION NR 157.07, WIS. ADMIN. CODE
FORM 3200-4[illegible] REV: 3-82

I. GENERATOR OF WASTE (Must be filled in by Producer)

A. NAME: THOMAS INDUSTRIES, INC. — TELEPHONE NO.: 414-457-4891

STREET OR ROUTE: 1419 ILLINOIS AVENUE

CITY, STATE, ZIP CODE: SHEBOYGAN, WI 53081

B. PRODUCER ORDER: P.O. #J-10834 — PLACED BY: — DATE: 2-9-84

II. DESCRIPTION OF WASTE (Must be filled in by Producer)

A. TYPE OF PCB WASTE (✓One Below)

- ☐ PCB Fluid (Dielectric, Hydraulic, etc.)
- ☐ PCB Contaminated Fluid
- ☐ Transformer
- ☒ Capacitor
- ☐ PCB Contaminated Solvents
- ☐ PCB Contaminated Oils
- ☐ PCB Contaminated Soil
- ☐ PCB Contaminated Cleanup Materials (Rags, etc.)
- ☐ PCB Contaminated Machinery
- ☐ PCB Contaminated Process Waste
- ☐ Other (Specify)

B. PHYSICAL DESCRIPTION OF PCB WASTE

1. Total Quantity: 795 (✓One Below) ☒ Lbs. ☐ Tons ☐ Cu. Yards ☐ Gals. ☐ 55 Gal. Drums ☐ Bulk Tanks ☐ Other (Specify)
2. Number of Containers: (2) (✓One Below) ☒ 55 Gal. Drums ☐ Bulk Tanks ☐ Other (Specify)
3. Physical State (✓One Below) ☐ Solid ☒ Liquid ☐ Gas ☐ Sludge
4. PCB Concentration: UNKNOWN PPM
5. Hazardous Properties (✓Below All That Apply) ☐ Volatile ☒ Toxic ☐ Corrosive ☐ Flammable ☐ Explosive

C. SPECIAL HANDLING INSTRUCTIONS AND TOXIC EFFECTS (If Any)

US DOT HAZARD CLASS ORM-E UN2315

III. INTENDED DISPOSITION OF WASTE (Must be filled in by Producer)

A. NAME OF INTENDED HAULER: ~~ROLLINS ENVIRONMENTAL SERVICES (TEXAS) INC.~~

BUSINESS STREET OR ROUTE: P.O. BOX 609, 2027 BATTLEGROUND ROAD

BUSINESS CITY, STATE, ZIP CODE: DEER PARK, TEXAS 77536

B. NAME OF INTENDED DISPOSER OR SERVICE FACILITY: ROLLINS ENVIRONMENTAL SERVICES (TEXAS), INC.

STREET OR ROUTE: P.O. BOX 609, 2027 BATTLEGROUND ROAD

CITY, STATE, ZIP CODE: DEER PARK, TEXAS 77536

IV. GENERATOR CERTIFICATION

I certify that the foregoing information is true and correct.

NAME AND TITLE (Typed or Printed): RANDOLPH P. HOLUB MGR MFG ENG

SIGNATURE: Randolph P. Holub — DATE: 3/3/84

Keep Generator Copy for your records. Give remaining copies to transporter.

V. TRANSPORTER OR FULL SERVICE CONTRACTOR (Must be filled in by Hauler)

A. NAME: ROLLINS ENVIR. SERV (713) 479-6001 — TELEPHONE NO.:

STREET OR ROUTE: P.O. BOX 609 DEER PARK, TX

CITY, STATE, ZIP CODE: 77571

B. STATE LIQUID OR SOLID WASTE HAULER LICENSE NUMBER: 11259

C. HAULER JOB NO.: N/A — PICKUP DATE: 3-3-84

D. VEHICLE LICENSE NO.: R23-310 — STATE: TX — NO. OF TRIPS: 1

VI. TRANSPORTER OR FULL SERVICE CONTRACTOR

I certify as true and correct that the waste described in Part II of this manifest was hauled by me to the following named Service or Disposal Facility, and was accepted by that Service or Disposal Facility.

NAME AND TITLE (Typed or Printed): FRANK B CESARIO (DRIVER)

SIGNATURE: Frank B Cesario — DATE: 3-3-84

Keep Transporter Copy for your records. Give remaining copies to Service or Disposal Facility.

VII. SERVICE FACILITY (Must be filled in by Facility)

A. NAME: N/A — TELEPHONE NO.:

STREET OR ROUTE:

CITY, STATE, ZIP CODE:

B. TOTAL QUANTITY OF PCB RECEIVED (✓ONE) ☐ Lbs. ☐ Tons ☐ Gal. ☐ Cu. Yds. ☐ 55 Gal. Drums ☐ Bulk Tanks ☐ Other (Specify)

C. DESCRIPTION OF PCB WASTE PRODUCE RECEIVED

D. PCB WAS ☐ Disposed or ☐ Reclaimed

E. NAME OF INTENDED DISPOSER

VIII. SERVICE FACILITY CERTIFICATION

I certify as true and correct that the Transporter or Full Service Contractor named above delivered the waste described in Part II of this manifest to this Service Facility; that this waste was an acceptable material under the terms of federal, state and local regulations; and that it was processed at this facility.

N/A

NAME AND TITLED (Typed or Printed): SUE STEWART

SIGNATURE: Sue Stewart — DATE: 3-5-84

Keep Service Facility Copy for your records. Send Generator Copy to Generator if PCB waste was reclaimed. Give remaining copy(s) to Disposal Facility if waste is intended for disposal.

IX. DISPOSER OF WASTE (Must be filled in by Disposer)

A. NAME: ROLLINS ENVIRONMENTAL SERVICES (TEXAS) — TELEPHONE NO.: 713-479-6001

STREET OR ROUTE: P.O. BOX 609, 2027 BATTLEGROUND ROAD

CITY, STATE, ZIP CODE: DEER PARK, TEXAS 77536

B. ADDRESS OF DISPOSAL SITE IF DIFFERENT FROM ABOVE

C. STATE INCINERATOR PERMIT NO. OR LANDFILL LICENSE NO.: 01429

D. QUANTITY OF PCB WASTE RECEIVED AND DISPOSED

1. Total Quantity: 905 (✓One Below) ☒ Lbs. ☐ Tons ☐ Gals. ☐ Cu. Yards
2. Number of Containers: 2 (✓One Below) ☐ Landfill ☒ Incineration ☐ Other (Specify)

E. DISPOSAL METHOD (✓One Below) ☐ Landfill ☒ Incineration ☐ Other (Specify)

F. DISPOSAL DATE

X. DISPOSER CERTIFICATION

I certify as true and correct that the Transporter or Full Service Contractor named above delivered the waste described in Part II of this manifest to this Disposal Facility; that the waste was an acceptable material under the terms of federal, state and local regulations; and that it was disposed of at this site.

NAME AND TITLE (Typed or Printed): Marleen Dunnigan, Trans. Sec.

SIGNATURE: Marleen Dunnigan — DATE: 3-5-84

Keep Disposer of Waste Copy for your records. Send a copy to Generator.

SPILLS OF PCB MUST BE REPORTED TO THE DIVISION OF EMERGENCY GOVERNMENT AT 608-266-3232 24 HOURS PER DAY.

(CONTINUED NEXT COLUMN)

MAILING COPY (GENERATOR)

ATTACHMENT F

Texas Department of Water Resources
P.O. Box 13087, Capitol Station
Austin, Texas 78711

Ticket No. 000 0125

TEXAS WASTE SHIPPING–CONTROL TICKET

(Please Type or Print Clearly)

(Satisfies TDWR, TDH, U.S. DOT and U.S. EPA requirements for hazardous or class I waste manifest)

T07

PART I: To be completed by Generator (see reverse side for instructions)

Company Name: THOMAS INDUSTRIES, INC.

Business Address: 1419 ILLINOIS AVENUE, SHEBOYGAN, WISCONSIN

Address From Which Shipment Originates: 1419 ILLINOIS AVENUE, SHEBOYGAN, WI 53081

TDWR/TDH Registration No.: 9 9 9 5 5

EPA Gen. #: W I D 0 0 6 1 0 0 8 8 7

Emergency Phone A/C: 414-457-4891

DESTINATION:

Primary TSD Facility Name: ROLLINS ENVIRONMENTAL SERVICE (TEXAS)

Business Address: P.O. BOX 609, 2027 BATTLEGROUND ROAD

Destination (Site) Address: DEER PARK, TEXAS 77536

TDWR/TDH Permit No.: 0 1 4 2 9

EPA TSD Fac. #: T X D 0 5 5 1 4 1 3 7 8

Phone A/C: 713 479 6001

Alternate TSD Facility Name: N/A

Business Address:

Destination (Site) Address:

TDWR/TDH Permit No.: N/A

EPA TSD Fac. #:

Phone A/C:

1. US DOT PROPER SHIPPING NAME	2. US DOT HAZARD CLASS	3. UN/NA NUMBER	4. QUANTITY	UNITS*	5. CONTAINER NO.	TYPE	6. TEXAS WASTE CODE
POLYCHLORINATED BIPHENYL	ORME	U N 2 3 1 5	(3) 8	1 2 3 (4)	3 2	17-E	171890
RQ WASTE SOLIDS				1 2 3 4			
				1 2 3 4			
				1 2 3 4			
				1 2 3 4			
				1 2 3 4			
				1 2 3 4			

* Circle one: (1) tons (2) gallons (3) cubic yards (4) drums (55 gal.)

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, TDWR, and TDH.

Date of Shipment: 4-19-84

Sig. of Authorized Agent: Donald D. Schmidt

PART II: To be completed by the Transporter/Driver (see reverse side for instructions)

Transporter: ROLLINS ENVIRONMENTAL SERVICES (TEXAS)

Business Address: P.O. BOX 609, DEER PARK, TEXAS 77536

Phone Number A/C: 713-479-6001

TDWR/TDH Trans. No.: 0 1 4 2 9

EPA Trans. No.: T X D 0 5 5 1 4 1 3 7 8

Date Received: 4-19-84

I certify (or declare) that the materials in the quantities described above are received by me for shipment to the above named destination.

Sig. of Authorized Agent: [illegible]

PART III: To Be completed by Treatment, Storage and Disposal (TSD) Facility Owner/Operator (see reverse side for instructions)

TSD Facility Name: Rollins Environmental Services, (Tx) Inc.

Phone Number: 713 • 479-6001

Site Address: 2027 Battleground Road Deer Park, Texas 77536

TSD Facility Owner/Operator Comments:

TDWR/TDH Permit No.: 0 1 4 2 9

EPA TSD Fac. No.: T X D 0 5 5 1 4 1 3 7 8

Date Received: 4-21-84

I certify (or declare) that the materials in the quantities described in Part I are received by me.

Sig. of Authorized Agent: [illegible]

White - Original Pink - TSD Facility Yellow - Transporter Green - Generator's First Copy

TDWR-0311 (Rev. 5-29-81)

STATE OF WISCONSIN
DEPARTMENT OF NATURAL RESOURCES
BOX 7921
MADISON, WISCONSIN 53707

PCB WASTE TRACKING FORM

PURSUANT TO SECTION NR 157.07, WIS. ADMIN. CODE
FORM 3200-[illegible] REV. 3-82

I. GENERATOR OF WASTE (Must be filled in by Producer)

A. NAME: THOMAS INDUSTRIES, INC. TELEPHONE NO.: 414-457-4891
STREET OR ROUTE: 1419 ILLINOIS AVENUE
CITY, STATE, ZIP CODE: SHEBOYGAN, WI 53081

B. PRODUCER ORDER: P.O. #J-11581 PLACED BY: DATE: 4-13-84

II. DESCRIPTION OF WASTE (Must be filled in by Producer)

A. TYPE OF PCB WASTE (✓One Below)

- [ ] PCB Fluid (Dielectric, Hydraulic, etc.)
- [ ] PCB Contaminated Fluid
- [ ] Transformer
- [x] Capacitor
- [ ] PCB Contaminated Solvents
- [ ] PCB Contaminated Oils
- [ ] PCB Contaminated Soil
- [ ] PCB Contaminated Cleanup Materials (Rags, etc.)
- [ ] PCB Contaminated Machinery
- [ ] PCB Contaminated Process Waste
- [ ] Other (Specify)

B. PHYSICAL DESCRIPTION OF PCB WASTE

1. Total Quantity 905 (✓ One Below)
   - [x] Lbs.
   - [ ] Gals.
   - [ ] Tons
   - [ ] 55 Gal. Drums
   - [ ] Cu. Yards
   - [ ] Bulk Tanks
   - [ ] Other (Specify)
2. Number of Containers ~~XXX~~ (3) (✓One Below)
   - [x] 55 Gal. Drums
   - [ ] Other (Specify)
   - [ ] Bulk Tanks
3. Physical State (✓One Below)
   - [ ] Solid
   - [ ] Sludge
   - [x] Liquid
   - [ ] Gas
4. PCB Concentration UNKNOWN PPM
5. Hazardous Properties (✓Below All That Apply)
   - [ ] Volatile
   - [ ] Flammable
   - [x] Toxic
   - [ ] Explosive
   - [ ] Corrosive

C. SPECIAL HANDLING INSTRUCTIONS AND TOXIC EFFECTS (If Any)

US DOT HAZARD CLASS ORM-E UN2315

III. INTENDED DISPOSITION OF WASTE (Must be filled in by Producer)

A. NAME OF INTENDED HAULER: ROLLINS ENVIRONMENTAL SERVICES(TEXAS),INC.
BUSINESS STREET OR ROUTE: P.O. BOX 609,2027 BATTLEGROUND ROAD
BUSINESS CITY, STATE, ZIP CODE: DEER PARK, TEXAS 77536

B. NAME OF INTENDED DISPOSER OR SERVICE FACILITY: ROLLINS ENVIRONMENTAL SERVICES (TEXAS),INC.
STREET OR ROUTE: P.O. BOX 609,2027 BATTLEGROUND ROAD
CITY, STATE, ZIP CODE: DEER PARK, TEXAS 77536

IV. GENERATOR CERTIFICATION

I certify that the foregoing information is true and correct.

NAME AND TITLE (Typed or Printed): R.D. SCHNEIDER, MGR. MFG. ENGINEERING
SIGNATURE: Ronald D. Schneider DATE: 4-17-84

Keep Generator Copy for your records. Give remaining copies to transporter.

V. TRANSPORTER OR FULL SERVICE CONTRACTOR (Must be filled in by Hauler)

A. NAME: Rollins Environmental TELEPHONE NO.: 713 479 6001
STREET OR ROUTE: 2027 Battleground Rd
CITY, STATE, ZIP CODE: Deer Park Tx

B. STATE LIQUID OR SOLID WASTE HAULER LICENSE NUMBER: TXD 055141378

C. HAULER JOB NO.: PICKUP DATE: 4-19-84

D. VEHICLE LICENSE NO.: RAQ-387 STATE: Tx NO. OF TRIPS: ONE

VI. TRANSPORTER OR FULL SERVICE CONTRACTOR

I certify as true and correct that the waste described in Part II of this manifest was hauled by me to the following named Service or Disposal Facility, and was accepted by that Service or Disposal Facility.

NAME AND TITLE (Typed or Printed): H. JANSON TRANSPORT DRIVER
SIGNATURE: H. Janson DATE: 4-19-84

Keep Transporter Copy for your records. Give remaining copies to Service or Disposal Facility.

VII. SERVICE FACILITY (Must be filled in by Facility)

A. NAME: N/A TELEPHONE NO.:
STREET OR ROUTE:
CITY, STATE, ZIP CODE:

B. TOTAL QUANTITY OF PCB RECEIVED (✓ONE)

- [ ] Lbs.
- [ ] Cu. Yds.
- [ ] Other (Specify)
- [ ] Tons
- [ ] 55 Gal. Drums
- [ ] Gal.
- [ ] Bulk Tanks

C. DESCRIPTION OF PCB WASTE PRODUCE RECEIVED

D. PCB WAS [ ] Disposed or [ ] Reclaimed

E. NAME OF INTENDED DISPOSER

VIII. SERVICE FACILITY CERTIFICATION

I certify as true and correct that the Transporter or Full Service Contractor named above delivered the waste described in Part II of this manifest to this Service Facility; that this waste was an acceptable material under the terms of federal, state and local regulations; and that it was processed at this facility.

NAME AND TITLED (Typed or Printed): N/A
SIGNATURE: DATE:

Keep Service Facility Copy for your records. Send Generator Copy to Generator if PCB waste was reclaimed. Give remaining copy(s) to Disposal Facility if waste is intended for disposal.

IX. DISPOSER OF WASTE (Must be filled in by Disposer)

A. NAME: ROLLINS ENVIRONMENTAL SERVICES (TEXAS) TELEPHONE NO.: 713-479-5001
STREET OR ROUTE: P.O. BOX 609, 2027 BATTLEGROUND ROAD
CITY, STATE, ZIP CODE: DEER PARK, TEXAS 77536

B. ADDRESS OF DISPOSAL SITE IF DIFFERENT FROM ABOVE

C. STATE INCINERATOR PERMIT NO. OR LANDFILL LICENSE NO.: 01429

D. QUANTITY OF PCB WASTE RECEIVED AND DISPOSED

1. Total Quantity 1275 (✓One Below)
   - [x] Lbs.
   - [ ] Cu. Yards
   - [ ] Tons
   - [ ] Gals.
2. Number of Containers (✓One Below)
   - [ ] Landfill
   - [ ] Incineration
   - [ ] Other (Specify)

E. DISPOSAL METHOD (✓One Below)

- [ ] Landfill
- [ ] Incineration
- [ ] Other (Specify)

F. DISPOSAL DATE

X. DISPOSER CERTIFICATION

I certify as true and correct that the Transporter or Full Service Contractor named above delivered the waste described in Part II of this manifest to this Disposal Facility; that the waste was an acceptable material under the terms of federal, state and local regulations; and that it was disposed of at this site.

NAME AND TITLE (Typed or Printed): L. FRANZ
SIGNATURE: L. Franz DATE: 4-21-84

Keep Disposer of Waste Copy for your records. Send a copy to Generator.

SPILLS OF PCB MUST BE REPORTED TO THE DIVISION OF EMERGENCY GOVERNMENT AT 608-266-3232 24 HOURS PER DAY.

(CONTINUED NEXT COLUMN)

MAILING COPY (GENERATOR)

ATTACHMENT G

US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

EPA

TOXIC SUBSTANCES CONTROL ACT

RECEIPT FOR SAMPLES AND DOCUMENTS

Form Approved
OMB No. 2070-0007
Approval expires 8-31-85

1. INVESTIGATION IDENTIFICATION			2. FIRM NAME
DATE 3/5/86	INSPECTOR NO. 4224	DAILY SEQ. NO. 01	Thomas Industries
3. INSPECTOR ADDRESS U.S. EPA, Region V 230 S. Dearborn, SS-RTSB-7 Chicago, Illinois 60604			4. FIRM ADDRESS 1419 Illinois Ave. Sheboygan, WI.

The documents and samples of chemical substances and/or mixtures described below were collected in connection with the administration and enforcement of the Toxic Substances Control Act.

RECEIPT OF THE DOCUMENT(S) AND/OR SAMPLE(S) DESCRIBED IS HEREBY ACKNOWLEDGED:

NO.	DESCRIPTION
86TS39S01	Soil sample - South side of plant near utility pole.
" S02	wipe sample - from brick east of roof drain, south side of plant
" S03	sludge - south plant wall next to downspout west of back door
" S04	oil from #14 diecast machine
" S05	oil from #12 diecast machine
" S06	oil from #9 diecast machine
" S07	oil from die cast tramp trench between machine #14 & #15.
" S08	water from diecast cooling system at discharge to storm sewer
" S09	oil from main trench line, taken at pt. of machine #12.
S10	oil-Water sample from the last 55 gallon drum in the back boiler Rm.
S11	oil from Hydraulic System #8
S12	Soil sample around drums in back boiler Rm.
S13	oil from waste oil Tank
Documents	
1pg	map of Thomas Industries
1pg	PCB test results on #1 & #5 Hydraulic machine
4pgs	waste manifest for PCB capacitor Disposal

OPTIONAL:

DUPLICATE OR SPLIT SAMPLES: REQUESTED AND PROVIDED ☒ NOT REQUESTED ☐

INSPECTOR SIGNATURE		RECIPIENT SIGNATURE	
Scott Cooper		Ronald D. Schneider	
NAME Scott Cooper		NAME RONALD D. SCHNEIDER	
TITLE Environmental Protection Specialist	DATE SIGNED 3/5/86	TITLE MANG. MFG. ENGR.	DATE SIGNED 3-5-86

Form 7740-1 (12-82)

INSPECTOR'S FILE