

Franklin Non-Ferrous Foundry, Inc.

P.O. Box 35 • 293 Sanborn St.

Franklin, NH 03235

Ph (603) 934-6767

(800) 260-6769

Fax (603) 934-7135

BRASS – BRONZE – ALUMINUM Castings

October 1, 2010

**Wanda Santiago, Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Suite 100
Mail Code ORA18-1
Boston, MA 02109-3912**

**Lisa Papetti
Senior Enforcement Coordinator, RCRA Enforcement Unit
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Suite 100
Mail Code
Boston, MA 02109-3912**

**Andrea Simpson, Senior Enforcement Council
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Suite 100
Mail Code OES04-2**

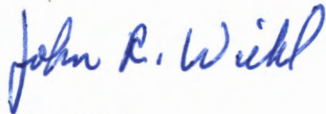
RE: EPA Docket No. RCRA-01-2010-0053

Dear Ms Santiago , Ms Papetti & Ms Simpson :

Pursuant to Paragraph 33 of the Complaint, Compliance Order and Notice of Opportunity for Hearing, the Respondent, Franklin Non-Ferrous Foundry's previous waste determinations usually identified the waste sand was hazardous and was considered therefore Hazardous by the Respondent, Franklin Non-Ferrous Foundry.

Pursuant to Paragraph 34 of the Complaint, Compliance Order and Notice of Opportunity for Hearing, the Respondent, Franklin Non-Ferrous Foundry has shipped off-site these hazardous wastes to a properly permitted treatment facility to achieve compliance. The hazardous waste manifests are attached

Very Truly Yours,



**John R. Wiehl
President**

**Sent by Express Mail to:
Wanda Santiago
Lisa Papetti
Andrea Simpson**



UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number NH0986467223	2. Page 1 of	3. Emergency Response Phone (508) 872-5000	4. Manifest Tracking Number 005821041 JJK			
5. Generator's Name and Mailing Address FRANKLIN MANUFACTURING COMPANY P.O. BOX 35 FRANKLIN, NH 03235 Generator's Phone: (603) 934-6767			Generator's Site Address (if different than mailing address) 293 SANBORN STREET FRANKLIN NH 03235					
6. Transporter 1 Company Name ROLEX TRANSPORT LEE			U.S. EPA ID Number NYD9E075641					
7. Transporter 2 Company Name			U.S. EPA ID Number					
8. Designated Facility Name and Site Address ROLEX LABORATORY 760 INDUSTRIEL BLVD. BLAINVILLE, PA 734 Facility's Phone: (450) 430-9230			U.S. EPA ID Number NYD9E075641					
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
		No.	Type			13a	13b	13c
	1. HAZARDOUS WASTE, SOLID, IN A DRUM (ADMILAM) 9 NA3077 PB	01	CM	2000 P				
	2.							
	3.							
	4.							
14. Special Handling Instructions and Additional Information SAND (GENERAL CHEMICAL CORPORATION) BEING AN INTERMEDIARY ARRANGING FOR EXPORT								
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/Officer's Printed/Typed Name JOHN WIEHL					Signature <i>John Wiehl</i>		Month Day Year 08 30 10	
16. International Shipments <input type="checkbox"/> Import to U.S. <input checked="" type="checkbox"/> Export from U.S.			Port of entry/exit: Highgate Spring, VT Date leaving U.S.: 31 Dec 2010					
17. Transporter Acknowledgment of Receipt of Materials								
Transporter 1 Printed/Typed Name Joes Michael					Signature <i>Joes Michael</i>		Month Day Year 08 30 10	
Transporter 2 Printed/Typed Name					Signature		Month Day Year	
18. Discrepancy								
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> 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	

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number NH0986467223	2. Page 1 of 1	3. Emergency Response Phone (508) 872-5000	4. Manifest Tracking Number 005881044 JJK		
5. Generator's Name and Mailing Address FRANKLIN MIN-FERRARIS TIRE CO P.O. BOX 35 FRANKLIN, NH 03235 Generator's Phone: (603) 934-6767				Generator's Site Address (if different than mailing address) 293 SANBORN STREET FRANKLIN NH 03235			
6. Transporter 1 Company Name ROLLEX TRANSPORT LTEE				U.S. EPA ID Number NYF066000053			
7. Transporter 2 Company Name				U.S. EPA ID Number			
8. Designated Facility Name and Site Address STAPLEX CANADA, INC. 760 INDUSTRIEL BLVD. BLAINVILLE, PQ 734 Facility's Phone: (450) 430-9230				U.S. EPA ID Number NYD980756415			
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
		No.	Type				
	1. RC, HAZARDOUS WASTE, SOLID, N.O.S. (CONTAINING CADMIUM) 9 NA3007 PG III (D006 D008)	01	CM	EST	P	D006	D008
	2.						
	3.						
	4.						
14. Special Handling Instructions and Additional Information UNCLAS / 1/62076/1434 (CONSIST LEAD & CADMIUM CONTAMINATED SAND (GENERAL CHEMICAL CORPORATION ACTING AS AN INTERMEDIARY ARRANGING FOR EXPORT)							
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 JOHN WIEHL				Signature <i>John Wiehl</i>		Month Day Year 04 02 10	
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: <i>Wilmington, DE</i> Transporter signature (for exports only): <i>[Signature]</i> Date leaving U.S.: <i>[Date]</i>							
17. Transporter Acknowledgment of Receipt of Materials							
Transporter 1 Printed/Typed Name Edward Mathis				Signature <i>[Signature]</i>		Month Day Year 9 2 10	
Transporter 2 Printed/Typed Name				Signature		Month Day Year	
18. Discrepancy							
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection							
Manifest Reference Number:							
18b. Alternate Facility (or Generator)				U.S. EPA ID Number			
Facility's Phone:						Month Day Year	
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	

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number NH0986467223	2. Page 1 of 1	3. Emergency Response Phone (508) 872-5000		4. Manifest Tracking Number 005881045 JJK			
		5. Generator's Name and Mailing Address FRANKLIN NON-FERROUS FURNACE P.O. BOX 35 FRANKLIN, NH 03235			Generator's Site Address (if different than mailing address) 273 SANBORN STREET FRANKLIN NH 03235			Generator's Phone: (603) 934-6767	
6. Transporter 1 Company Name ROLLEX TRANSPORT LTEE					U.S. EPA ID Number NYF006000453				
7. Transporter 2 Company Name					U.S. EPA ID Number				
8. Designated Facility Name and Site Address STABLEX CANADA, INC. 760 INDUSTRIEL BLVD. BLAINVILLE, PQ 734					U.S. EPA ID Number NYF0980756415				
Facility's Phone: (450) 430-9230									
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))			10. Containers		11. Total Quantity	12. Unit WL/Vol.	13. Waste Codes	
				No.	Type				
1	1. RD, HAZARDOUS WASTE, SOLID, N.O.C. (LTD). (ADMILUM) 9 NA3077 PG 113 (D006 INHIB) ER68 (V)			01	CM	EST 30000	D	D006	D008
2									
3									
4									
14. Special Handling Instructions and Additional Information 8050337-176267712107 (1) HIGHER LEAD & CADMIUM CONTAMINATED SAND (GENERAL CHEMICAL CORPORATION ACTING AS AN INTERMEDIARY ARRANGING FOR EXPORT)									
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 JOHN WIEHL					Signature <i>John Wiehl</i>			Month Day Year 09 07 10	
16. International Shipments <input type="checkbox"/> Import to U.S. <input checked="" type="checkbox"/> Export from U.S. Port of entry/exit: 1609011 SPAIN 01 Transporter signature (for exports only): <i>[Signature]</i> Date leaving U.S.: 9/7/10									
17. Transporter Acknowledgment of Receipt of Materials									
Transporter 1 Printed/Typed Name BO WARD MOBILE					Signature <i>[Signature]</i>			Month Day Year 9 7 10	
Transporter 2 Printed/Typed Name					Signature			Month Day Year	
18. Discrepancy									
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection									
18b. Alternate Facility (or Generator)					Manifest Reference Number: 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	

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number NH0986467223	2. Page 1 of 1	3. Emergency Response Phone (508) 872-5000	4. Manifest Tracking Number 005881046 JJK		
5. Generator's Name and Mailing Address FRANKLIN HAZARDOUS WASTE P.O. BOX 35 FRANKLIN, NH 03235 Generator's Phone: (603) 934-6767				Generator's Site Address (if different than mailing address) 293 SENECA STREET FRANKLIN NH 03235			
6. Transporter 1 Company Name RETEX TRANSPORT LEE				U.S. EPA ID Number NYF006000053			
7. Transporter 2 Company Name				U.S. EPA ID Number			
8. Designated Facility Name and Site Address STAVEX CANADA, INTL. 760 INDUSTRIEL BLVD. BLAINVILLE, PQ 734 Facility's Phone: (450) 430-9230				U.S. EPA ID Number NYD980756415			
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
		No.	Type				
X	1. RD, HAZARDOUS WASTE, SOLID, N.O.S. (LEAD, CADMIUM) 9 NA3077 PG III (D006 D008)	1	GM	EST.	P	D006	D008
	2.						
	3.						
	4.						
14. Special Handling Instructions and Additional Information SAND (GENERAL CHEMICAL CORPORATION ACTING AS AN INTERMEDIARY ARRANGING FOR EXPORT)							
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 JOHN WIEHL				Signature <i>John Wiehl</i>		Month Day Year 09 13 10	
16. International Shipments <input type="checkbox"/> Import to U.S. Transporter signature (for exports only):		<input checked="" type="checkbox"/> Export from U.S.		Port of entry/exit: Highgate Springs UT Date leaving U.S.: Sept 13			
17. Transporter Acknowledgment of Receipt of Materials							
Transporter 1 Printed/Typed Name RICHARD PLANT				Signature <i>Richard Plant</i>		Month Day Year 09 13 10	
Transporter 2 Printed/Typed Name				Signature		Month Day Year	
18. Discrepancy							
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection							
18b. Alternate Facility (or Generator)				Manifest Reference Number: 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	

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number NHU986467223	2. Page 1 of 1	3. Emergency Response Phone (508) 872-3000	4. Manifest Tracking Number 005881174 JJK		
5. Generator's Name and Mailing Address FRANKLIN NOW-FERRIS COMPANY P.O. BOX 35 FRANKLIN, NH 03235 Generator's Phone: (508) 934-6767				Generator's Site Address (if different than mailing address) 200 SANBORN STREET FRANKLIN NH 03235			
6. Transporter 1 Company Name ROLLEX TRANSPORT LEE				U.S. EPA ID Number NYF006602453			
7. Transporter 2 Company Name				U.S. EPA ID Number			
8. Designated Facility Name and Site Address STABLEX CANADA, INC. 760 INDUSTRIEL BLVD. BLAINVILLE, PQ 734 Facility's Phone: (450) 438-9230				U.S. EPA ID Number NYD006756415			
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
		No.	Type				
1	1.00, HAZARDOUS WASTE, SOLID, N.O.S. (CADMIUM) 9 NA3077 (DANGEROUS)	01	CM	EST 38000 P		D006	D006
2							
3							
4							
14. Special Handling Instructions and Additional Information SAND (GENERAL CHEMICAL CONTAMINATION ACTION AS AN INTERMEDIARY ARRANGING FOR EXPORT)							
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 <i>John White</i>				Signature <i>John White</i>		Month Day Year 09 20 10	
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: HIGHgate SPRINGS VT Date leaving U.S.: 9/20/10							
17. Transporter Acknowledgment of Receipt of Materials							
Transporter 1 Printed/Typed Name <i>Edward Maltais</i>				Signature <i>Edward Maltais</i>		Month Day Year 9 20 10	
Transporter 2 Printed/Typed Name				Signature		Month Day Year	
18. Discrepancy							
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection							
18b. Alternate Facility (or Generator)				Manifest Reference Number: 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
TRANSPORTER INTL
DESIGNATED FACILITY

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number NH0986467223	2. Page 1 of 1	3. Emergency Response Phone (508) 872-5999		4. Manifest Tracking Number 005881175 JJK				
		5. Generator's Name and Mailing Address FRANKLIN INDUSTRIAL PRODUCTS, INC. P.O. BOX 35 FRANKLIN, NH 03235 Generator's Phone: (603) 934-6767		Generator's Site Address (if different than mailing address) 293 SANBORN STREET FRANKLIN NH 03235						
6. Transporter 1 Company Name KULLEX TRANSPORT LTD.		U.S. EPA ID Number NY1 0060000193								
7. Transporter 2 Company Name		U.S. EPA ID Number								
8. Designated Facility Name and Site Address STALEX CANADA, INC. 760 INDUSTRIEL BLVD. BLAINVILLE, PQ 734 Facility's Phone: (438) 430-9236		U.S. EPA ID Number NYD980756019								
GENERATOR	9a. HM	9b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		10. Containers		11. Total Quantity	12. Unit WL/Vol.	13. Waste Codes		
				No.	Type					
	X	1. 100, HAZARDOUS WASTE, SOLID, N.T.S. (CONTAINING CADMIUM) 9 MARCH 1988 III (D006 D008)		01	CM	EST 36000	P			
		2.								
		3.								
	4.									
14. Special Handling Instructions and Additional Information UNDESIRABLE LEAD & CADMIUM CONTAMINATED SAND (GENERAL CHEMICAL CORPORATION ACTING AS AN INTERMEDIARY ARRANGING FOR EXPORT)										
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 JOHN WIEHL		Signature <i>John Wiehl</i>			Month Day Year 09/28/10					
TRANSPORTER INT'L	16. International Shipments <input type="checkbox"/> Import to U.S. <input checked="" type="checkbox"/> Export from U.S.		Port of entry/exit: Date leaving U.S.:		Highgate Spring, V.T. 09/28/10					
	17. Transporter Acknowledgment of Receipt of Materials									
	Transporter 1 Printed/Typed Name Yves Michaud		Signature <i>Yves Michaud</i>			Month Day Year 9/28/10				
Transporter 2 Printed/Typed Name		Signature			Month Day Year					
DESIGNATED FACILITY	18. Discrepancy									
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection									
	18b. Alternate Facility (or Generator)		Manifest Reference Number:			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					