

12 November 2010

U.S. Environmental Protection Agency, Region 2
Attn.: Mr. Hector Velez, Esq.
Assistant Regional Counsel, Office of Reg., Counsel
Centro Eurpoa Building, Suite 417
1492 Ponce de Leon Avenue
San Juan, Puerto Rico 00907-4127

Re: Dana Transport, San Juan, PR
Docket No. RCRA 02-2010-7112
Respondent's Response to Complaint

Dear Mr. Velez:

The ensuing writing addresses those allegations set forth in the aforesaid Docket, which is numerically represented as writings 1-35 in said Docket. The reader should note that many of these numerically assigned writings speak to jurisdiction, Acts, language definitions and 40 CFR citation references, not requiring a response. Moreover, supporting documents have been attached to the Respondent's response as well as interviews had, especially fact pattern interviews with Mr. David LaCavera, hereinafter ("LaCavera") tank wash manager, Dana Transport, San Juan, PR to develop this document.

USEPA's Allegations and Respondent's Response (Answers)

- A. USEPA's Investigative and Initial Enforcement Activities-on or about 10 July 2009, USEPA inspected the Respondent's facility and alleged the ensuing non-compliant findings. Respondent's response ensues with associated cited supporting documentation.

17. (a) Seven 55 gallon drums (DM) had been inspected in the HWSA (hazardous waste storage area), five DMs were alleged to contain hazardous substances. One DM was alleged to have contained D001-F003 waste materials and allegedly found leaking on HWSA's floor. According to LaCavera and two witness reports, two witnesses, namely, Messrs. Hernandez and Amezquita, attached herewith, allege the contents were dirt solids and the DM's associated rust was allegedly associated with roof rain events. Additionally, according to LaCavera, DM logs, attached herewith, were executed and reflect this period of time as well as DM TSDF and transporters accepting said DM as to DOT ship worthy DMs associated with alleged rust, etc.,-manifests-002095743 and 002095879, attached herewith for review. **NOTE:** Respondent has been advised to correct the roof leak forthwith and was equally advised by LaCavera that the HWSA is diked, namely, with three sides being diked and one side as to ramp to ingress/egress said HWSA, which speaks to DM containment.

(b) Alleged spills in HWSA: With respect to alleged spills associated with said DM and HWSA, LaCavera and witness reports suggest that stains allegedly reflect rust associated with rain events as to floor staining.

(c) HWSA allegedly requires spill equipments: With respect to this allegation, as the writer cites in 17a, said DMs are housed in a diked HWSA. Moreover, LaCavera alleges that spill material is on station, provided by Aramsco-vendor-invoice S1523387.001, attached herewith, as to spill pads, PPE, front end loader heavy equipment, fork lift, oil dry and spill booms. He (LaCavera) further asserts these materials are housed in juxtaposed, secured locations so to preclude inclement weather association as well as alleged varmint ingress/egress to said materials.

U.S. ENVIRONMENTAL
PROTECTION AGENCY-REG. II
2010 NOV 24 A 11:37
HFT 2010 HEARING
SECRET

USEPA Dana PR
Page Two

Respondent's Response Finding 17 Continued:

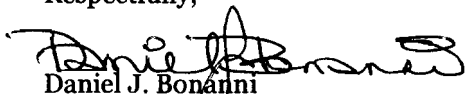
(d-e) USEPA requires a hazardous waste determination with respect to granular carbon, or activated carbon: Attached herewith are both said analysis, Dana Container, 09-7104 to 09-7106, sample no. 09-7105-carbon tank, and a facsimile to USEPA as to missing manifests requested in said inspection and analysis submitted along with manifests. **NOTE:** USEPA's Finding 18 writings suggest that on 14 July 2009, USEPA received said information for review and action.

32. Weekly logs: LaCavera has provided a copy of said logs as cited in the aforesaid writing, which are attached herewith for review.

In closing, please be so kind as to review the Respondent's response and contact Mr. LaCavera at (787)221-9834 to establish an informal conference so that said writings and documents may be discussed to remedy and closure of said Docket. I thank you in advance for your time and consideration in this matter as well as the USEPA's 30 day extension as to this document. Should you have any queries whatsoever as to this document, please do not hesitate to contact this writer at (800) 733-3262, 106.

For the Corporation-Dana

Respectfully,


Daniel J. Bonanni
Vice President
Corporate Risk Management Office
Dana Corporation

Wp:djb Dana PR USEPA

C: Mr. Ronald B. Dana, CEO, Dana Corporation
Mr. David LaCavera, Tank Wash Manager, Dana PR
Case File No. Docket No. RCRA 02-2010-7112

Dana Transport, Inc., San Juan, PR Docket. RCRA 02-2010-7112 Supporting Documentation

1. Facility HWSA witness statements
2. Facility Week Logs
3. Aramsco spill materials
4. Facility correspondence(facsimile) to USEPA-carbon lab analysis
5. Facility HSWA manifests

Dana Transport Inc.

PO Box 10995
San Juan, PR 00922
787-787-9022

To whom it might concern:

On July 10, 2009 arrived a visit from EPA to our facilities to do an area inspection.

They found on the premises a metal drum, that they assume leaked a liquid product because it appeared to have some rust on it. However when my co-worker and I went to open this drum we realized immediately that they had made a mistake, since the product that was inside the drum was dirt.

When we moved the drum to another location we realized that the stain of oxide on the floor had been caused by water that came from a leak or drip of water coming from a hole in the roof top of the warehouse.

We realized then, that this oxide stain on the floor of the warehouse was made by the humidity entrapped in the area when it rains.

Thank you for your time,

 11/16/12

Gadiel Amezcua
Tank Washer
For Dana Transport



Dana Transport Inc.

PO Box 10995
San Juan, PR 00922
787-787-9022

To whom it might concern:

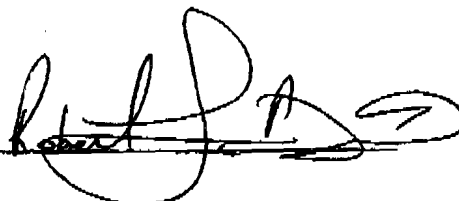
On July 10, 2009 I Rogelio Hernandez did not find any leaking drum in the warehouse. I did observed a stain of oxide on the ground surrounding one of the metal drum. The size of this stain was approximately of 10' to 12' inches. After that I proceeded to put on for my security gear, went back to the warehouse, opened the presumed leaking drum to find, not liquid, but only dirt in it. I had to use a shovel and a 5gl pail to make the transfer to another drum.

I did observed that there was water coming from a hole in the roof of warehouse and that moisture was entrapped in the area, when it rains, That is what caused the drum to rust and the oxidized stain on the ground

Thank you for your time

 11/16/10

Rogelio Hernandez
Tank Washer
For Dana Transport

Witness  11/16/10

Facility Daily Inspection Log

Month: Jan 2009

This document is required to be completed daily per inspection of all facility drum-satellite area and storage area, discharge levels, and temperature levels to determine regulatory and spill/leak prevention compliance.

1.	TIME	INSPECTOR	AIISLE SP.	LABELS/ACC. DATES	CONDITION	REMARKS
2.	7AM	LaCavera	OK	OK	OK	
3.						
4.						
5.	7AM	LaCavera	OK	OK	OK	
6.	8AM	LaCavera	OK	OK	OK	
7.	8AM	LaCavera	OK	OK	OK	
8.	7AM	LaCavera	OK	OK	OK	
9.	8AM	LaCavera	OK	OK	OK	
10.						
11.						
12.	7AM	LaCavera	OK	OK	OK	
13.	8AM	LaCavera	OK	OK	OK	
14.	7AM	LaCavera	OK	OK	OK	
15.	8AM	LaCavera	OK	OK	OK	
16.	7AM	LaCavera	OK	OK	OK	
17.						
18.						
19.	7AM	LaCavera	OK	OK	OK	
20.	8AM	LaCavera	OK	OK	OK	
21.	8AM	LaCavera	OK	OK	OK	
22.	8AM	LaCavera	OK	OK	OK	
23.	7AM	LaCavera	OK	OK	OK	
24.						
25.						
26.	7AM	LaCavera	OK	OK	OK	
27.	8AM	LaCavera	OK	OK	OK	
28.	7AM	LaCavera	OK	OK	OK	
29.	7AM	LaCavera	OK	OK	OK	
30.	7AM	LaCavera	OK	OK	OK	
31.						

NOTE: All on-site hazardous waste drums must have labels listing that the material is hazardous waste and its accumulation dates. The satellite drum area must contain one drum only with a secured - snap handle closed at all times.

Facility Daily Inspection Log

Month: FEB 2009

This document is required to be completed daily per inspection of all facility drum-satellite area and storage area discharge levels, and temperature levels to determine regulatory and spill/leak prevention compliance.

TIME	INSPECTOR	AISI, E SP.	LABELS/ACC DATES	CONDITION	REMARKS
1.					
2.	7AM	LaCavera	OK	OK	OK
3.	7AM	LaCavera	OK	OK	OK
4.	7AM	LaCavera	OK	OK	OK
5.	8AM	LaCavera	OK	OK	OK
6.	8AM	LaCava	OK	OK	OK
7.					
8.					
9.	7AM	LaCava	OK	OK	OK
10.	8AM	LaCava	OK	OK	OK
11.	7AM	LaCava	OK	OK	OK
12.	7AM	LaCava	OK	OK	OK
13.	8AM	LaCava	OK	OK	OK
14.					
15.					
16.	7AM	LaCava	OK	OK	OK
17.	7AM	LaCava	OK	OK	OK
18.	8AM	LaCava	OK	OK	OK
19.	8AM	LaCava	OK	OK	OK
20.	7AM	LaCava	OK	OK	OK
21.					
22.					
23.	7AM	LaCava	OK	OK	OK
24.	7AM	LaCava	OK	OK	OK
25.	7AM	LaCava	OK	OK	OK
26.	7AM	LaCava	OK	OK	OK
27.	7AM	LaCava	OK	OK	OK
28.					
29.					
30.					
31.					

NOTE: All on-site hazardous waste drums must have labels listing that the material is hazardous waste and its accumulation dates. The satellite drum area must contain one drum only with a secured - snap handle closed at all times.

Facility Daily Inspection Log

Month: MARCH 2009

This document is required to be completed daily per inspection of all facility drum-satellite area and storage area, discharge levels, and temperature levels to determine regulatory and spill/leak prevention compliance.

1.	TIME	INSPECTOR	AISLE SP.	LABELS/ACC. DATES	CONDITION	REMARKS
2.	7AM	LaCavera	OK	OK	OK	OK
3.	7AM	LaCavera	OK	OK	OK	OK
4.	7AM	LaCavera	OK	OK	OK	OK
5.	7AM	LaCavera	OK	OK	OK	OK
6.	6:30AM	LaCavera	OK	OK	OK	OK
7.						
8.						
9.	7AM	LaCavera	OK	OK	OK	OK
10.	7AM	LaCavera	OK	OK	OK	OK
11.	7AM	LaCavera	OK	OK	OK	OK
12.	7AM	LaCavera	OK	OK	OK	OK
13.						
14.						
15.						
16.	7AM	LaCavera	OK	OK	OK	
17.	7AM	LaCavera	OK	OK	OK	
18.	7AM	LaCavera	OK	OK	OK	
19.	7AM	LaCavera	OK	OK	OK	
20.	7AM	LaCavera	OK	OK	OK	
21.						
22.						
23.	7AM	LaCavera	OK	OK	OK	
24.	7AM	LaCavera	OK	OK	OK	
25.	7AM	LaCavera	OK	OK	OK	
26.	7AM	LaCavera	OK	OK	OK	
27.	7AM	LaCavera	OK	OK	OK	
28.						
29.						
30.	7AM	LaCavera	OK	OK	OK	
31.	7AM	LaCavera	OK	OK	OK	

NOTE: All on-site hazardous waste drums must have labels listing that the material is hazardous waste and its accumulation dates. The satellite drum area must contain one drum only with a secured - snap handle closed at all times.

Facility Daily Inspection Log

Month: APRIL 2009

This document is required to be completed daily per inspection of all facility drum-satellite area and storage area, discharge levels, and temperature levels to determine regulatory and spill/leak prevention compliance.

	TIME	INSPECTOR	AISI I SP.	LABELS/ACC DATES	CONDITION	REMARKS
1.	7AM	LaCava	OK	OK	OK	—
2.	8AM	LaCava	OK	OK	OK	—
3.	7AM	LaCava	OK	OK	OK	—
4.						—
5.						—
6.	7AM	LaCava	OK	OK	OK	—
7.	7AM	LaCava	OK	OK	OK	—
8.	7AM	LaCava	OK	OK	OK	—
9.	7AM	LaCava	OK	OK	OK	—
10.						—
11.						—
12.						—
13.	7AM	LaCava	OK	OK	OK	—
14.	7AM	LaCava	OK	OK	OK	—
15.	7AM	LaCava	OK	OK	OK	—
16.	7AM	LaCava	OK	OK	OK	—
17.	7AM	LaCava	OK	OK	OK	—
18.						—
19.						—
20.	7AM	LaCava	OK	OK	OK	—
21.	7AM	LaCava	OK	OK	OK	—
22.	7AM	LaCava	OK	OK	OK	—
23.	7AM	LaCava	OK	OK	OK	—
24.	7AM	LaCava	OK	OK	OK	—
25.						—
26.						—
27.	7AM	LaCava	OK	OK	OK	—
28.	7AM	LaCava	OK	OK	OK	—
29.	7AM	LaCava	OK	OK	OK	—
30.	7AM	LaCava	OK	OK	OK	—
31.	NA					

NOTE: All on-site hazardous waste drums must have labels listing that the material is hazardous waste and its accumulation dates. The satellite drum area must contain one drum only with a secured - snap handle closed at all times.

Facility Daily Inspection Log

Month: MAY 2009

This document is required to be completed daily per inspection of all facility drum-satellite area and storage area, discharge levels, and temperature levels to determine regulatory and spill/leak prevention compliance.

1.	TIME	INSPECTOR	AISLE SP.	LABELS/ACC DATES	CONDITION	REMARKS
1.	7AM	LaCavera	OK	OK	OK	—
2.						—
3.						—
4.	7AM	LaCavera	OK	OK	OK	—
5.	7AM	LaCavera	OK	OK	OK	—
6.	7AM	LaCavera	OK	OK	OK	—
7.	7AM	LaCavera	OK	OK	OK	—
8.	7AM	LaCavera	OK	OK	OK	—
9.						—
10.						—
11.	7AM	LaCavera	OK	OK	OK	—
12.	7AM	LaCavera	OK	OK	OK	—
13.	7AM	LaCavera	OK	OK	OK	—
14.	7AM	LaCavera	OK	OK	OK	—
15.	7AM	LaCavera	OK	OK	OK	—
16.						—
17.						—
18.	7AM	LaCavera	OK	OK	OK	—
19.	7AM	LaCavera	OK	OK	OK	—
20.	7AM	LaCavera	OK	OK	OK	—
21.						—
22.						—
23.						—
24.						—
25.	MEMORIAL DAY					
26.	7AM	LaCavera	OK	OK	OK	—
27.	7AM	LaCavera	OK	OK	OK	—
28.	7AM	LaCavera	OK	OK	OK	—
29.	7AM	LaCavera	OK	OK	OK	—
30.						—
31.						—

NOTE: All on-site hazardous waste drums must have labels listing that the material is hazardous waste and its accumulation dates. The satellite drum area must contain one drum only with a secured - snap handle closed at all times.

Facility Daily Inspection Log

Month: June 2005

This document is required to be completed daily per inspection of all facility drum-satellite area and storage area, discharge levels, and temperature levels to determine regulatory and spill/leak prevention compliance.

	TIME	INSPECTOR	AI SLT SP.	LABELS/ACC DATES	CONDITION	REMARKS
1.	7AM	LaCavera	OK	OK	OK	—
2.	7AM	LaCavera	OK	OK	OK	—
3.	7AM	LaCavera	OK	OK	OK	—
4.	7AM	LaCavera	OK	OK	OK	—
5.	7AM	LaCavera	OK	OK	OK	—
6.						—
7.						—
8.	7AM	LaCavera	OK	OK	OK	—
9.	7AM	LaCavera	OK	OK	OK	—
10.	7AM	LaCavera	OK	OK	OK	—
11.	7AM	LaCavera	OK	OK	OK	—
12.	7AM	LaCavera	OK	OK	OK	—
13.						—
14.						—
15.	7AM	LaCavera	OK	OK	OK	—
16.	7AM	LaCavera	OK	OK	OK	—
17.	7AM	LaCavera	OK	OK	OK	—
18.	7AM	LaCavera	OK	OK	OK	—
19.	7AM	LaCavera	OK	OK	OK	—
20.						—
21.						—
22.	7AM	LaCavera	OK	OK	OK	—
23.	7AM	LaCavera	OK	OK	OK	—
24.	7AM	LaCavera	OK	OK	OK	—
25.	7AM	LaCavera	OK	OK	OK	—
26.	7AM	LaCavera	OK	OK	OK	—
27.						—
28.						—
29.	7AM	LaCavera	OK	OK	OK	—
30.	7AM	LaCavera	OK	OK	OK	—
31.						—

NOTE: All on-site hazardous waste drums must have labels listing that the material is hazardous waste and its accumulation dates. The satellite drum area must contain one drum only with a secured - snap handle closed at all times.

Facility Daily Inspection Log

Month: July 2009

This document is required to be completed daily per inspection of all facility drum-satellite area and storage area, discharge levels, and temperature levels to determine regulatory and spill/leak prevention compliance.

#	TIME	INSPECTOR	ATSL/LE SP.	LABELS/ACC. DATES	CONDITION	REMARKS
1.	7AM	LaCueva	OK	OK	OK	OK
2.	7AM	LaCueva	OK	OK	OK	OK
3.						
4.						
5.						
6.	7AM	LaCueva	OK	OK	OK	OK
7.	7AM	LaCueva	OK	OK	OK	—
8.	7AM	LaCueva	OK	OK	OK	—
9.	7AM	LaCueva	OK	OK	OK	—
10.	7AM	LaCueva	OK	OK	OK	—
11.						—
12.						—
13.	7AM	LaCueva	OK	OK	OK	—
14.	7AM	LaCueva	OK	OK	OK	—
15.	7AM	LaCueva	OK	OK	OK	—
16.	7AM	LaCueva	OK	OK	OK	—
17.	7AM	LaCueva	OK	OK	OK	—
18.						—
19.						—
20.	7AM	LaCueva	OK	OK	OK	—
21.	7AM	LaCueva	OK	OK	OK	—
22.	7AM	LaCueva	OK	OK	OK	—
23.	7AM	LaCueva	OK	OK	OK	—
24.						—
25.						—
26.						—
27.	7AM	LaCueva	OK	OK	OK	—
28.	7AM	LaCueva	OK	OK	OK	—
29.	7AM	LaCueva	OK	OK	OK	—
30.	7AM	LaCueva	OK	OK	OK	—
31.	7AM	LaCueva	OK	OK	OK	—

NOTE: All on-site hazardous waste drums must have labels listing that the material is hazardous waste and its accumulation codes. The satellite drum area must contain one drum only with a secured - snap handle closed at all times.

Facility Daily Inspection Log

August 2009

Month: August 2009

This document is required to be completed daily per inspection of all facility drum-satellite area and storage area discharge levels, and temperature levels to determine regulatory and spill/leak prevention compliance.

#	TIME	INSPECTOR	AISI, E SP.	LABELS/ACC DATES	CONDITION	REMARKS
1.						
2.						
3.	7AM	LaCavera	OK	OK	OK	
4.	7AM	LaCavera	OK	OK	OK	
5.	7AM	LaCavera	OK	OK	OK	
6.	7AM	LaCavera	OK	OK	OK	
7.	7AM	LaCavera	OK	OK	OK	
8.						
9.						
10.	7AM	LaCavera	OK	OK	OK	
11.	7AM	LaCavera	OK	OK	OK	
12.	7AM	LaCavera	OK	OK	OK	
13.	7AM	LaCavera	OK	OK	OK	
14.	7AM	LaCavera	OK	OK	OK	
15.						
16.						
17.	7AM	LaCavera	OK	OK	OK	
18.	7AM	LaCavera	OK	OK	OK	
19.	7AM	LaCavera	OK	OK	OK	
20.	7AM	LaCavera	OK	OK	OK	
21.	7AM	LaCavera	OK	OK	OK	
22.						
23.						
24.	7AM	LaCavera	OK	OK	OK	
25.	7AM	LaCavera	OK	OK	OK	
26.	7AM	LaCavera	OK	OK	OK	
27.	7AM	LaCavera	OK	OK	OK	
28.	7AM	LaCavera	OK	OK	OK	
29.						
30.						
31.	7AM	LaC	OK	OK	OK	OK

NOTE: All on-site hazardous waste drums must have labels listing that the material is hazardous waste and its accumulation dates. The satellite drum area must contain one drum only with a secured - snap handle closed at all times.

Facility Daily Inspection Log

Month: Sept 2005

This document is required to be completed daily per inspection of all facility drum-satellite area and storage area, discharge levels, and temperature levels to determine regulatory and spill/leak prevention compliance.

1.	TIME	INSPECTOR	AIISLE SP.	LABELS/ACC DATES	CONDITION	REMARKS
1.	7AM	LACRUZ	OK	OK	OK	09
2.	7AM	LACRUZ	OK	OK	OK	
3.	7AM	LACRUZ	OK	OK	OK	
4.	7AM	LACRUZ	OK	OK	OK	
5.						
6.						
7.						
8.	7AM	LACRUZ	OK	OK	OK	
9.	7AM	LACRUZ	OK	OK	OK	
10.	7AM	LACRUZ	OK	OK	OK	
11.	7AM	LACRUZ	OK	OK	OK	
12.						
13.						
14.	7AM	LACRUZ	OK	OK	OK	
15.	7AM	LACRUZ	OK	OK	OK	
16.	7AM	LACRUZ	OK	OK	OK	
17.	7AM	LACRUZ	OK	OK	OK	
18.	7AM	LACRUZ	OK	OK	OK	
19.						
20.						
21.	7AM	LACRUZ	OK	OK	OK	
22.	7AM	LACRUZ	OK	OK	OK	
23.	7AM	LACRUZ	OK	OK	OK	
24.	7AM	LACRUZ	OK	OK	OK	
25.	7AM	LACRUZ	OK	OK	OK	
26.						
27.						
28.	7AM	LACRUZ	OK	OK	OK	
29.	7AM	LACRUZ	OK	OK	OK	
30.	7AM	LACRUZ	OK	OK	OK	
31.	ND					

NOTE: All on-site hazardous waste drums must have labels listing that the material is hazardous waste and its accumulation dates. The satellite drum area must contain one drum only with a secured - snap handle closed at all times.

Facility Daily Inspection Log

Month: OCT 2009

This document is required to be completed daily per inspection of all facility drum-satellite area and storage area, discharge levels, and temperature levels to determine regulatory and spill/leak prevention compliance.

	TIME	INSPECTOR	ASST. SP.	LABELS/ACC DATES	CONDITION	REMARKS
1.	7AM	LACAM	OK	OK	OK	
2.	7AM	LACAM	OK	OK	OK	
3.						
4.	7AM	LACAM	OK	OK	OK	
5.	7AM	LACAM	OK	OK	OK	
6.	7AM	LACAM	OK	OK	OK	
7.	7AM	LACAM	OK	OK	OK	
8.	7AM	LACAM	OK	OK	OK	
9.	7AM	LACAM	OK	OK	OK	
10.						
11.	7AM	LACAM	OK	OK	OK	
12.	7AM	LACAM	OK	OK	OK	
13.	7AM	LACAM	OK	OK	OK	
14.	7AM	LACAM	OK	OK	OK	
15.	7AM	LACAM	OK	OK	OK	
16.	7AM	LACAM	OK	OK	OK	
17.						
18.	7AM	LACAM	OK	OK	OK	
19.	7AM	LACAM	OK	OK	OK	
20.	7AM	LACAM	OK	OK	OK	
21.	7AM	LACAM	OK	OK	OK	
22.	7AM	LACAM	OK	OK	OK	
23.	7AM	LACAM	OK	OK	OK	
24.						
25.						
26.	7AM	LACAM	OK	OK	OK	
27.	7AM	LACAM	OK	OK	OK	
28.	7AM	LACAM	OK	OK	OK	
29.	7AM	LACAM	OK	OK	OK	
30.						
31.						

NOTE: All on-site hazardous waste drums must have labels listing that the material is hazardous waste and its accumulation dates. The satellite drum area must contain one drum only with a secured - snap handle closed at all times.

Facility Daily Inspection Log

Month: NOV 2009

This document is required to be completed daily per inspection of all facility drum-satellite area and storage area discharge levels, and temperature levels to determine regulatory and spill/leak prevention compliance.

1.	TIME	INSPECTOR	AISI, E SP.	LABELS/ACC. DATES	CONDITION	REMARKS
2.	7AM	LACARCA	OK	OK	OK	—
3.	7AM	LACARCA	OK	OK	OK	—
4.	7AM	LACARCA	OK	OK	OK	—
5.	7AM	LACARCA	OK	OK	OK	—
6.	7AM	LACARCA	OK	OK	OK	—
7.						—
8.						—
9.	7AM	LACARCA	OK	OK	OK	—
10.	7AM	LACARCA	OK	OK	OK	—
11.	7AM	LACARCA	OK	OK	OK	—
12.	7AM	LACARCA	OK	OK	OK	—
13.	7AM	LACARCA	OK	OK	OK	—
14.						—
15.						—
16.	7AM	LACARCA	OK	OK	OK	—
17.	5:30AM	LACARCA	OK	OK	OK	—
18.	7AM	LACARCA	OK	OK	OK	—
19.	7AM	LACARCA	OK	OK	OK	—
20.	7AM	LACARCA	OK	OK	OK	—
21.						—
22.						—
23.	7AM	LACARCA	OK	OK	OK	—
24.	7AM	LACARCA	OK	OK	OK	—
25.	7AM	LACARCA	OK	OK	OK	—
26.						—
27.	7AM	LACARCA	OK	OK	OK	—
28.	7AM	LACARCA	OK	OK	OK	—
29.	7AM	LACARCA	OK	OK	OK	—
30.	7AM	LACARCA	OK	OK	OK	—
31.						—

NOTE: All on-site hazardous waste drums must have labels listing that the material is hazardous waste and its accumulation dates. The satellite drum area must contain one drum only with a secured - snap handle closed at all times.

Facility Daily Inspection Log

Month: Dec 2009

This document is required to be completed daily per inspection of all facility drum-satellite area and storage area, discharge levels, and temperature levels to determine regulatory and spill/leak prevention compliance.

	TIME	INSPECTOR	AISI, II SP.	LABELS/ACC. DATES	CONDITION	REMARKS
1.	7AM	LACASA	OK	OK	OK	—
2.	7AM	LACASA	OK	OK	OK	—
3.	7AM	LACASA	OK	OK	OK	—
4.	7AM	LACASA	OK	OK	OK	—
5.						—
6.						—
7.	7AM	LACASA	OK	OK	OK	—
8.	7AM	LACASA	OK	OK	OK	—
9.	7AM	LACASA	OK	OK	OK	—
10.	7AM	LACASA	OK	OK	OK	—
11.	7AM	LACASA	OK	OK	OK	—
12.						—
13.						—
14.	7AM	LACASA	OK	OK	OK	—
15.	7AM	LACASA	OK	OK	OK	—
16.	7AM	LACASA	OK	OK	OK	—
17.	7AM	LACASA	OK	OK	OK	—
18.	7AM	LACASA	OK	OK	OK	—
19.						—
20.						—
21.	7AM	LACASA	OK	OK	OK	—
22.	7AM	LACASA	OK	OK	OK	—
23.	7AM	LACASA	OK	OK	OK	—
24.	7AM	LACASA	OK	OK	OK	—
25.						—
26.						—
27.						—
28.	7AM	LACASA	OK	OK	OK	—
29.	7AM	LACASA	OK	OK	OK	—
30.	7AM	LACASA	OK	OK	OK	—
31.	7AM	LACASA	OK	OK	OK	—

NOTE: All on-site hazardous waste drums must have labels listing that the material is hazardous waste and its accumulation dates. The satellite drum area must contain one drum only with a secured - snap handle closed at all times.



www.aramsco.com

REMIT TO:
 LOCK BOX #3956
 PO BOX 8500
 PHILADELPHIA PA 19178-3956

Invoice

INVOICE DATE	INVOICE NUMBER
03/31/10	S1523387.001
Accounts Receivable: Yolanda Ruiz yrulz@aramsco.com 787-880-0335	PAGE NO 1

BILL TO:
 DANA TRANSPORT INC.
 PO BOX 10995
 CAPARRA HEIGHTS STATION
 SAN JUAN, PR 00922-0995

SHIP TO:
 DANA TRANSPORT INC
 195 CARR 5
 ZONA INDUSTRIAL LUCHETTI
 BAYAMON, PR 00961-7420

CUSTOMER NUMBER	CUSTOMER ORDER NUMBER	RELEASE NUMBER	SALESPERSON			
6951 - 38293	033010TM01		Veronica Torre			
ORDERED BY	SHIP FROM	SHIP VIA	TERMS	SHIP DATE	ORDER DATE	
DAVE LACAVERA	PRAR	OUR TRUCK - PRAR	NET 30 DAYS	03/31/10	03/30/10	
ITEM #	DESCRIPTION	TC	ORDER QTY	SHIP QTY	Net Prc	Ext Prc
59021	15" X 19" UNIVERSAL GREY SONIC BONDED HEAVY WEIGHT PADS, (100) PER PACK	T	2pk	2pk	47.500/pk	95.00
30094	ROUGH FINISH 14" PVC GLOVES WITH INTERLOCK LINING	T	12dz	12dz	16.470/dz	197.64
40505	NORTH A69-02 YELLOW PEAK RAIN TROUGH 6PT NYLON PIN LOCK SUSPENSION HDPE HARD HAT	T	3ea	3ea	6.740/ea	20.22
40502	NORTH A69-04 GREEN PEAK RAIN TROUGH 6PT NYLON PIN LOCK SUSPENSION HDPE HARD HAT	T	7ea	7ea	6.740/ea	47.18
40108	DBI AA7010A LIGHT COMPLIANCE IN A CAN KIT WITH AB17530 HARNESS AND AE57610 LANYARD	T	2ea	2ea	76.320/ea	152.64
91388	55 GALLON HDPE BLUE OPEN HEAD DRUM WITH NATURAL LID, 3/4" FITTING AND COATED LEVER LOCK RING, UN EMBOSSED	T	10ea	10ea	57.910/ea	579.10
08:00am EDT Date 3/31/10 Signature: Yolandita Ruiz # Items 36 Printed Name: Yolandita Ruiz						

Subtotal	1091.78
S&H CHGS	0.00
Sales Tax	76.42
Pay/Adj	0.00
Amount Due	1168.20

Invoice is due by 04/30/10.

All claims for shortage or errors must be made at once. Returns require written authorization and are subject to handling charges. Special orders are non-returnable.
 Terms of sales are available at www.aramsco.com/terms



A SAFEGUARD INDUSTRIAL COMPANY

www.aramsco.com



Ship Ticket

URB. VICTOR ROJAS II
502 ZONA INDUSTRIAL
ARECIBO PR 00612-3072
787-878-8200 Fax 787-880-0380

ORDER DATE	ORDER NUMBER
01/12/10	S1494802.001
PAGE NO.	
1 of 1	

SOLD TO:
DANA TRANSPORT INC.
PO BOX 10995
CAPARRA HEIGHTS STATION
SAN JUAN, PR 00922-0995
787-787-9022

SHIP TO:
DANA TRANSPORT INC
195 CARR 5
ZONA INDUSTRIAL LUCHETTI
BAYAMON, PR 00961-7420

CUSTOMER NUMBER	CUSTOMER PO NUMBER	RELEASE NUMBER	SALESPERSON
38293	011210TM01		Veronica Torres

WRITER	SHIP VIA	WAREHOUSE	SHIP DATE	FREIGHT
Raquel Bonilla	OUR TRUCK - PRAR	Shp PRAR Prc PRAR	01/12/10	Yes

ORDER QTY	SHIP QTY	DESCRIPTION
15ea	15ea	<p>***** Shipping Instructions *****</p> <p>* ATTN: DAVE *</p> <p>* TEL. 787-221-9834 *</p> <p>*****</p> <p>91388</p> <p>55 GALLON BLUE POLY OPEN HEAD DRUM</p> <p>WITH NATURAL LID, FITTING AND LEVER</p> <p>LOCK RING</p> <p>Unit Weight: 24.0 Ext Weight: 360.0</p> <p><i>Record 1/13/10</i></p> <p><i>[Signature]</i></p> <p><i>3/14/2010</i></p> <p><i>30384</i></p>

Total Weight: 360.0



www.aramsco.com



Ship Ticket

URB.VICTOR ROJAS II
 502 ZONA INDUSTRIAL
 ARECIBO PR 00612-3072
 787-878-8200 Fax 787-880-0380

ORDER DATE	ORDER NUMBER
11/02/09	S1472366.001
PAGE NO	
1 of 1	

SOLD TO:
 DANA TRANSPORT INC.
 PO BOX 10995
 CAPARRA HEIGHTS STATION
 SAN JUAN, PR 00922-0995
 787-787-9022

SHIP TO:
 DANA TRANSPORT INC
 195 CARR 5
 ZONA INDUSTRIAL LUCHETTI
 BAYAMON, PR 00961-7420

CUSTOMER NUMBER	CUSTOMER PO NUMBER	RELEASE NUMBER	SALESPERSON		
38293	091609TM02		Veronica Torres Vera		
WRITER	SHIP VIA	WAREHOUSE	SHIP DATE	FREIGHT	
Maria D Ruiz Gonzalez	OUR TRUCK - PRAR	Shp PRAR Prc PRAR	11/03/09	Yes	
ORDER QTY	SHIP QTY	DESCRIPTION			
10ea	10ea	***** Shipping Instructions ***** * ATTN: DAVE * * TEL. 787-221-9834 * ***** 91388 55 GALLON BLUE POLY OPEN HEAD DRUM WITH NATURAL LID, FITTING AND LEVER LOCK RING Unit Weight: 24.0 Ext Weight: 240.0			

Total Weight: 240.0



www.aramsco.com



URB. VICTOR ROJAS II
 502 ZONA INDUSTRIAL
 ARECIBO PR 00612-3072
 787-878-8200 Fax 787-880-0380

Ship Ticket

ORDER DATE	ORDER NUMBER
10/29/09	S1471382.001
PAGE NO.	
1 of 1	

SOLD TO:
 DANA TRANSPORT INC.
 PO BOX 10995
 CAPARRA HEIGHTS STATION
 SAN JUAN, PR 00922-0995
 787-787-9022

SHIP TO:
 DANA TRANSPORT INC
 195 CARR 5
 ZONA INDUSTRIAL LUCHETTI
 BAYAMON, PR 00961-7420

CUSTOMER NUMBER	CUSTOMER PO NUMBER	RELEASE NUMBER	SALESPERSON		
38293	102909-TM01		Veronica Torres Vera		
WRITER		SHIP VIA	WAREHOUSE	SHIP DATE	FREIGHT
Raquel Bonilla		OUR TRUCK - PRAR	Shp PRAR Prc PRAR	11/03/09	Yes
ORDER QTY	SHIP QTY	DESCRIPTION			
1pk	1pk	***** Shipping Instructions ***** * ATTN: DAVE * * TEL. 787-787-9022 * ***** 59142 15" X 19" OIL ONLY WHITE MELTBLOWN HEAVY WEIGHT PADS, (100) PER PACK Unit Weight: 13.0 Ext Weight: 13.0			
** The following are scheduled for future shipment:	1rl B/O	A75964 SAFEHOUSE SL-51 FLAMMABLE (3) SHIPPING LABEL 500/RL **** Above Item Not Returnable ****			
Total Weight: 13.0					



www.aramsco.com



URB. VICTOR ROJAS II
 502 ZONA INDUSTRIAL
 ARECIBO PR 00612-3072
 787-878-8200 Fax 787-880-0380

Ship Ticket

ORDER DATE	ORDER NUMBER
04/08/09	S1387236.002
PAGE NO	
1 of 1	

SOLD TO:
 DANA TRANSPORT INC.
 PO BOX 10995
 CAPARRA HEIGHTS STATION
 SAN JUAN, PR 00922-0995
 787-787-9022

SHIP TO:
 DANA TRANSPORT INC
 MARGINAL EXPRESO SUR
 RIO HONDO PO BOX 1856
 BAYAMON, PR 00960

CUSTOMER NUMBER	CUSTOMER PO NUMBER	RELEASE NUMBER	SALESPERSON	
38293	042309TW-01		Veronica Torres Vera	
WRITER	SHIP VIA	WAREHOUSE	SHIP DATE	FREIGHT
Raquel Bonilla	OUR TRUCK - PRAR	Shp PRAR Prc PRAR	04/27/09	Yes
ORDER QTY	SHIP QTY	DESCRIPTION		
10ea	10ea	***** Shipping Instructions ***** * ATTN: DAVE * * TEL. 787-221-9834 * *****		
1pk	1pk	90380 17H RECONDITIONED 55 GALLON STEEL OPEN HEAD 3 RING DRUM		
1pk	1pk	59019 15" X 19" OIL ONLY WHITE SONIC BONDED MEDIUM WEIGHT PADS, (100) PER PACK		
		59142 15" X 19" OIL ONLY WHITE MELTBLOWN HEAVY WEIGHT PADS, (100) PER PACK		
** The following are scheduled for future shipment:				
1pk	B/O	A24906 SAFEHOUSE HW-96924 6X6 VPO NON HAZARDOUS WASTE LABELS 25/PK **** Above Item Not Returnable ****		
1ea	B/O	A28238 SAFEHOUSE VSL-51 FLAMMABLE #3 SHIPPING LABEL 25/PK **** Above Item Not Returnable ****		



www.aramasco.com

REMIT TO:
 LOCK BOX #3956
 PO BOX 8500
 PHILADELPHIA PA 19178-3956

Invoice

INVOICE DATE	INVOICE NUMBER
04/27/09	S1387236.002
Accounts Receivable: Yolanda M Ruiz yruliz@aramaco.com 787-880-0335	PAGE NO. 1

BILL TO:
 DANA TRANSPORT INC.
 PO BOX 10995
 CAPARRA HEIGHTS STATION
 SAN JUAN, PR 00922-0995

SHIP TO:
 DANA TRANSPORT INC
 MARGINAL EXPRESO SUR
 RIO HONDO PO BOX 1856
 BAYAMON, PR 00960

CUSTOMER NUMBER	CUSTOMER ORDER NUMBER	RELEASE NUMBER	SALESPERSON			
6951 - 38293	042309TW-01		Veronica Torre			
ORDERED BY	SHIP FROM	SHIP VIA	TERMS	SHIP DATE	ORDER DATE	
DAVE	PRAR	OUR TRUCK - PRAR	NET 30 DAYS	04/27/09	04/08/09	
ITEM #	DESCRIPTION	TC	ORDER QTY	SHIP QTY	Net Prc	Ext Prc
90380	17H RECONDITIONED 55 GALLON STEEL OPEN HEAD 3 RING DRUM	T	10ea	10ea	36.000/ea	360.00
59019	15" X 19" OIL ONLY WHITE SONIC BONDED MEDIUM WEIGHT PADS, (100) PER PACK	T	1pk	1pk	34.370/pk	34.37
59142	15" X 19" OIL ONLY WHITE MELTBLOWN HEAVY WEIGHT PADS, (100) PER PACK	T	1pk	1pk	38.850/pk	38.85

Subtotal	433.22
S&H CHGS	0.00
Sales Tax	30.33
Pay/Adj	0.00
Amount Due	463.55

Invoice is due by 05/27/09.

All claims for shortage or errors must be made at once. Returns require written authorization and are subject to handling charges. Special orders are non-returnable.
 Terms of sales are available at www.aramaco.com/terms



www.aramsco.com

REMIT TO:
 LOCK BOX #3956
 PO BOX 8500
 PHILADELPHIA PA 19178-3956

Invoice

INVOICE DATE	INVOICE NUMBER
05/19/09	S1404378.001
Accounts Receivable: Yolanda N Ruiz yruiz@aramsco.com 787-880-0335	PAGE NO. 1

BILL TO:
 DANA TRANSPORT INC.
 PO BOX 10995
 CAPARRA HEIGHTS STATION
 SAN JUAN, PR 00922-0995

SHIP TO:
 DANA TRANSPORT INC
 MARGINAL EXPRESO SUR
 RIO HONDO PO BOX 1856
 BAYAMON, PR 00960

CUSTOMER NUMBER	CUSTOMER ORDER NUMBER	RELEASE NUMBER	SALESPERSON			
6951 - 38293	042309TW-01		Veronica Torre			
ORDERED BY	SHIP FROM	SHIP VIA	TERMS	SHIP DATE	ORDER DATE	
DAVE	PRAR	OUR TRUCK - PRAR	NET 30 DAYS	05/19/09	05/18/09	
ITEM #	DESCRIPTION	TC	ORDER QTY	SHIP QTY	Net Prc	Ext Prc
90380	17H RECONDITIONED 55 GALLON STEEL OPEN HEAD 3 RING DRUM	T	10ea	10ea	36.000/ea	360.00

Signature: *[Handwritten Signature]*
 Date: 5/19/09
 Printed Name: Chris Colonna
 # Items

Subtotal	360.00
S&H CHGS	0.00
Sales Tax	25.20
Pay/Adj	0.00
Amount Due	385.20

Invoice is due by 06/18/09.

All claims for shortage or errors must be made at once. Returns require written authorization and are subject to handling charges. Special orders are non-returnable.
 Terms of sales are available at www.aramsco.com/terms



A SAFEGUARD INDUSTRIAL COMPANY

www.aramsco.com

REMIT TO:
 LOCK BOX #3956
 PO BOX 8500
 PHILADELPHIA PA 19178-3956

Invoice

INVOICE DATE	INVOICE NUMBER
04/07/09	S1380347.001
Accounts Receivable: Yolanda N Ruiz yrulz@aramsco.com 787-880-0335	PAGE NO. 1

BILL TO:
 DANA TRANSPORT INC.
 PO BOX 10995
 CAPARRA HEIGHTS STATION
 SAN JUAN, PR 00922-0995

SHIP TO:
 DANA TRANSPORT INC
 MARGINAL EXPRESO SUR
 RIO HONDO PO BOX 1856
 BAYAMON, PR 00960

CUSTOMER NUMBER	CUSTOMER ORDER NUMBER	RELEASE NUMBER	SALESPERSON			
6951 - 38293	03-2009TM-01		Veronica Torre			
ORDERED BY	SHIP FROM	SHIP VIA	TERMS	SHIP DATE	ORDER DATE	
	PRAR	OUR TRUCK - PRAR	NET 30 DAYS	04/07/09	03/20/09	
ITEM #	DESCRIPTION	TC	ORDER QTY	SHIP QTY	Net Prc	Ext Prc
59142	15" X 19" OIL ONLY WHITE MELTBLOWN HEAVY WEIGHT PADS, (100) PER PACK	T	4pk	4pk	38.850/pk	155.40
59025	OIL-DRI PREMIUM ALL-PURPOSE ABSORBENT, 40 POUND BAG MSDS Sheet# 59025 Required	T	2bg	2bg	9.220/bg	18.44
EDT <i>[Signature]</i> <u>4/7/09</u> Signature Date <i>Quilio Carter</i> Printed Name # Items						

Subtotal	173.84
S&H CHGS	0.00
Sales Tax	12.17
Pay/Adj	0.00
Amount Due	186.01

Invoice is due by 05/07/09.

All claims for shortage or errors must be made at once. Returns require written authorization and are subject to handling charges. Special orders are non-returnable.
 Terms of sales are available at www.aramsco.com/terms



www.aramsco.com



URB. VICTOR ROJAS II
 502 ZONA INDUSTRIAL
 ARECIBO PR 00612-3072
 787-878-8200 Fax 787-880-0380

Ship Ticket

ORDER DATE	ORDER NUMBER
03/20/09	S1380347.001
PAGE NO.	
1 of 1	

SOLD TO:
 DANA TRANSPORT INC.
 PO BOX 10995
 CAPARRA HEIGHTS STATION
 SAN JUAN, PR 00922-0995
 787-787-9022

SHIP TO:
 DANA TRANSPORT INC
 MARGINAL EXPRESO SUR
 RIO HONDO PO BOX 1856
 BAYAMON, PR 00960

CUSTOMER NUMBER	CUSTOMER PO NUMBER	RELEASE NUMBER	SALESPERSON		
38293	03-2009TM-01		Veronica Torres Vera		
WRITER	SHIP VIA	WAREHOUSE	SHIP DATE	FREIGHT	
Myra Roman	OUR TRUCK - PRAR	Shp PRAR Prc PRAR	04/07/09	Yes	
ORDER QTY	SHIP QTY	DESCRIPTION			
4pk	4pk	***** Shipping Instructions *****			
		* ANGEL CANDELARIA *			
		* 787-779-1500 *			

		59142			
		15" X 19" OIL ONLY WHITE MELTBLOWN			
		HEAVY WEIGHT PADS, (100) PER PACK			
2bg	2bg	59025			
		OIL-DRI PREMIUM ALL-PURPOSE			
		ABSORBENT, 40 POUND BAG			
		MSDS Sheet# 59025 Required			

Sent to USEPA
San Juan

**DANA, PUERTO RICO
INTERNATIONAL EQUIPMENT LOGISTICS, INC.**

P.O. BOX 10995
CAPARRA HEIGHTS STATION
SAN JUAN, P.R. 00922
PHONE: (787) 787-9020 / 779-1500 / 779-1501
FAX: (787) 787-2512

FAX

TO: Jessee Alvarez (EPA) FROM: DANA
FAX: 787 289 7104 PAGE: 1 OF 23
PHONE: DATE: 7/14/09
RE: 2005 2007 BIENNIAL CC:

Urgent

For Review

Plase Comment

Please Reply

Comment:

Jessee, Here are the Reports you
Requested Also the MISSING MANIFESTS FINAL
DESTINATION PAGES FROM 2006 WHICH I
LOCATED. ALSO CARBON ANALYSIS WILL TAKE
PLACE Wed July 15th FROM SANCO. ALSO
OIL (used) DRUMS HAVE BEEN LABELED
Thanks Dave Felner

TRANSACTION REPORT

JUL-14-2009 TUE 10:20 AM

TX (MEMORY)

#	DATE	START TIME	RECEIVER	COM. TIME	PAGES	TYPE/NOTE	FILE
001	JUL-14	10:16 AM	7872897104	0:04:06	21	SG3 OK	581
TOTAL				0:04:06	21		

DANA CONTAINER
09-7104 to 09-7106

Sample Number: 09-7105

Description: Sample #2
Carbon Tank

RCI

PARAMETER	METHOD NUMBER	UNIT	LIMIT	RESULT	DATE ANALYZED	ANALYST
Reactive Cyanide	9014	mg/Kg	>250	N.D.	07/17/09	RVC
Reactive Sulfide	9034	mg/Kg	>500	N.D.	07/17/09	RVC
Ignitability	1030	mm/min	>100	<100	07/16/09	JOI
Corrosivity	9045D	pH Units	<2 - >12.5	6.85	07/15/09	JOI

TCLP METALS

PARAMETER	METHOD NUMBER	UNIT	LIMIT	RESULT	DATE ANALYZED	ANALYST
Arsenic	7060A	mg/L	5.0	N.D.	07/21/09	RVC
Barium	7080A	mg/L	100.0	N.D.	07/20/09	RVC
Cadmium	7130	mg/L	1.0	N.D.	07/20/09	RVC
Chromium	7190	mg/L	5.0	N.D.	07/20/09	RVC
Lead	7420	mg/L	5.0	N.D.	07/20/09	RVC
Mercury	7470A	mg/L	0.2	N.D.	07/21/09	RVC
Selenium	7740	mg/L	1.0	N.D.	07/21/09	RVC
Silver	7760A	mg/L	5.0	N.D.	07/20/09	RVC

N.D. = Not Detected

DANA CONTAINER
09-7104 to 09-7106

VOLATILE ORGANICS COMPOUNDS FOR TCLP

PARAMETER	METHOD NUMBER	UNIT	LIMIT	RESULT	DATE ANALYZED	ANALYST
Benzene	8260B	mg/L	0.50	N.D.	07/20/09	MPL
Carbon Tetrachloride	8260B	mg/L	0.50	N.D.	07/20/09	MPL
Chlorobenzene	8260B	mg/L	100	N.D.	07/20/09	MPL
Chloroform	8260B	mg/L	6.00	N.D.	07/20/09	MPL
1-4 Dichlorobenzene	8260B	mg/L	7.50	N.D.	07/20/09	MPL
1-2 Dichloroethane	8260B	mg/L	0.50	N.D.	07/20/09	MPL
1-1 Dichloroethylene	8260B	mg/L	0.70	N.D.	07/20/09	MPL
Methyl Ethyl Ketone	8260B	mg/L	200	N.D.	07/20/09	MPL
Tetrachloroethylene	8260B	mg/L	0.70	N.D.	07/20/09	MPL
Trichloroethylene	8260B	mg/L	0.50	N.D.	07/20/09	MPL
Vinyl Chloride	8260B	mg/L	0.20	N.D.	07/20/09	MPL

SEMI-VOLATILE ORGANICS COMPOUNDS FOR TCLP

PARAMETER	METHOD NUMBER	UNIT	LIMIT	RESULT	DATE ANALYZED	ANALYST
O-Cresol	8270C	mg/L	200	N.D.	07/20/09	MPL
M-Cresol & P-Cresol	8270C	mg/L	200	N.D.	07/20/09	MPL
2,4-Dinitrotoluene	8270C	mg/L	0.13	N.D.	07/20/09	MPL
Hexachlorobenzene	8270C	mg/L	0.13	N.D.	07/20/09	MPL
Hexachlorobutadiene	8270C	mg/L	0.50	N.D.	07/20/09	MPL
Hexachloroethane	8270C	mg/L	3.00	N.D.	07/20/09	MPL
Nitrobenzene	8270C	mg/L	2.00	N.D.	07/20/09	MPL
Pentachlorophenol	8270C	mg/L	100	N.D.	07/20/09	MPL
Pyridine	8270C	mg/L	5.00	N.D.	07/20/09	MPL
2,4,5-Trichlorophenol	8270C	mg/L	400	N.D.	07/20/09	MPL
2,4,6-Trichlorophenol	8270C	mg/L	2.00	N.D.	07/20/09	MPL

N.D. = Not Detected

DANA CONTAINER
09-7104 to 09-7106

PESTICIDES AND HERBICIDES FOR TCLP

PARAMETER	METHOD NUMBER	UNIT	LIMIT	RESULT	DATE ANALYZED	ANALYST
Chlordane	8270C	mg/L	0.03	N.D.	07/20/09	MPL
Endrin	8270C	mg/L	0.02	N.D.	07/20/09	MPL
Heptachlor	8270C	mg/L	0.008	N.D.	07/20/09	MPL
Heptachlor Epoxide	8270C	mg/L	0.008	N.D.	07/20/09	MPL
Lindane	8270C	mg/L	0.40	N.D.	07/20/09	MPL
Methoxychlor	8270C	mg/L	10.0	N.D.	07/20/09	MPL
Toxaphene	8270C	mg/L	0.50	N.D.	07/20/09	MPL
2,4-D	8151A	mg/L	10.0	N.D.	07/20/09	MPL
2,4,5-TP (Silvex)	8151A	mg/L	1.00	N.D.	07/20/09	MPL

N.D. = Not Detected

F82376012

SC PPW 4/24/2009

Form Approved. OMB No. 2050-0039

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

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number PR0000879092	2. Page 1 of 2/2	3. Emergency Response Phone (800)483-3718	4. Manifest Tracking Number 002095743 FLE		
5. Generator's Name and Mailing Address Dana Transport Inc. P.O. Box 10995 Caparra Heights Station Bayamon, PR 00922				Generator's Site Address (if different than mailing address) Marginal Expreso Rio Hondo Extremo Sur Bayamon, PR 00981			
Generator's Phone: (999)999-9999 ATTN: Hector Garcia							
6. Transporter 1 Company Name Clean Harbors Caribe Inc.				U.S. EPA ID Number PRR000013004			
7. Transporter 2 Company Name Juan E Hernandez Incorporated				U.S. EPA ID Number PRD000220732			
8. Designated Facility Name and Site Address Clean Harbors Deer Park LP 2027 Independence Parkway South La Porte, TX 77571				U.S. EPA ID Number TXD055141378			
Facility's Phone: (281)930-2300							
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 Wt./Vol.	13. Waste Codes
	x	1. RQ, UN1993, WASTE FLAMMABLE LIQUIDS, N.O.S., (ACETONE, ISOPROPANOL), 3, PG II (D001) FPC23C	No.	Type			D001 F003 OUTS219H
		2.					
		3.					
		4.					
14. Special Handling Instructions and Additional Information 1. CB355973-13X55 ERG#128				Alt Fac Clean Harbors El Dorado LLC 309 American Circle, El Dorado AR 71730 PH (870)863-7173			
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/Offorer's Printed/Typed Name DAVID P LACAUSA (SR OAM)				Signature <i>David P L</i>		Month Day Year 6 25 09	
INT'L	16. International Shipments		Port of entry/exit:		Date leaving U.S.:		
	<input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.						
TRANSPORTER	17. Transporter Acknowledgment of Receipt of Materials						
	Transporter 1 Printed/Typed Name Edgardo Lopez		Signature <i>Edgardo Lopez</i>		Month Day Year 06 25 09		
	Transporter 2 Printed/Typed Name Wilfred Kivero		Signature <i>Wilfred K</i>		Month Day Year 07 01 09		
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						
	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. H040	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 Kim Skawne		Signature <i>Kim Skawne</i>		Month Day Year 07 15 09		

Clean Harbors has the appropriate permits for and will accept the waste the generator is shipping.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number PRR000018259	2. Page 1 of 1	3. Emergency Response Phone (800)443-6718	4. Manifest Tracking Number 002095879 FLE		
5. Generator's Name and Mailing Address Dena Transport Inc P.O. Box 10995 Coppertown Heights Station Bayamon, PR 00922				Generator's Site Address (if different than mailing address) Marginal Expreso Rio Honda Extremo Sur Bayamon, PR 00961			
Generator's Phone (999) 999-8969 ATTN: Hector Garcia							
6. Transporter 1 Company Name Clean Harbors Caribe Inc				U.S. EPA ID Number PRR000019864			
7. Transporter 2 Company Name Juan E Hernandez Incorporated				U.S. EPA ID Number PRD090220732			
8. Designated Facility Name and Site Address Clean Harbors Deer Park LP 2027 Independencia Parkway South La Porte, TX 77571				U.S. EPA ID Number TXD055141378			
Facility's Phone: (281)980-2300							
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	X	1. RD, UN1993, WASTE FLAMMABLE LIQUIDS, N.O.S., (ACETONE, ISOPROPANOL), 3, PG II (D001)	001	Dm	00320	P	D001 F003 OUTS602H
	X	2. RD, UN1268, WASTE PETROLEUM DISTILLATES, N.O.S., (DIESEL FUEL, GASOLINE), 3, PG III (D001 D008 D013)	003	Dm	05900	P	D001 D008 D013 OUTS206H
	X	3. RD, UN3266, WASTE CORROSIVE LIQUID, BASIC, INORGANIC, N.O.S., (SODIUM HYDROXIDE, POTASSIUM HYDROXIDE), 8, PG II (D002)	001	DF	00480	P	D002
		4. NONE, NON HAZARDOUS, NON D.O.T. REGULATED, (ONLY DEBRIS), N/A	002	Dm	00640	P	NONE OUTS4091
14. Special Handling Instructions and Additional Information 1. CH381343 1x55 DM ERG#128 2. CH381271 2x55 DM ERG#128 3. CH381373 1x55 LF ERG#154 4. CH381369 2x55 DM				AR Pac. Clean Harbors Et Deseño LLC 308 American Circle, El Deseño AR 71730 PH (870) 683-7178			
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/Offoror's Printed/Typed Name DAVID L. CANSA (TREASURER)				Signature <i>[Signature]</i>		Month Day Year 7/6/09	
TRANSPORTER INT'L	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.			Port of entry/exit: _____ Date leaving U.S.: _____			
	17. Transporter Acknowledgment of Receipt of Materials						
TRANSPORTER	Transporter 1 Printed/Typed Name Richard D. Rivera			Signature <i>[Signature]</i>		Month Day Year 07/16/09	
	Transporter 2 Printed/Typed Name Richard D. Rivera			Signature <i>[Signature]</i>		Month Day Year 07/16/09	
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) Facility's Phone: _____ U.S. EPA ID Number: _____						
	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. H040		2. H040		3. H141		4. H040	
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	

Clean Harbors has the appropriate permits for and will accept the waste the generator is shipping.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number PRR000018259	2. Page 1 of 2	3. Emergency Response Phone (800)483-3718	4. Manifest Tracking Number 002095879 FLE				
5. Generator's Name and Mailing Address Dana Transport Inc P.O. Box 10995 Caparra Heights Station Bayamon, PR 00922			Generator's Site Address (if different than mailing address) Marginal Expreso Rio Hondo Extremo Sur Bayamon, PR 00961						
Generator's Phone: (989)999-9999 ATTN: Hector Garcia									
6. Transporter 1 Company Name Clean Harbors Caribe Inc.		U.S. EPA ID Number PRR000013864							
7. Transporter 2 Company Name Juan E Hernandez Incorporated		U.S. EPA ID Number PRD090220732							
8. Designated Facility Name and Site Address Clean Harbors Deer Park LP 2027 Independence Parkway South La Porte, TX 77571		U.S. EPA ID Number TXD055141378							
Facility's Phone: (281)930-2300									
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. RQ, UN1993, WASTE FLAMMABLE LIQUIDS, N.O.S., (ACETONE, ISOPROPNOL), 3, PG II (D001), FPC 23°C	001	Dm	00320	P	D001	F003		
							OUTS602H		
X	2. RQ, UN1268, WASTE PETROLEUM DISTILLATES, N.O.S., (DIESEL FUEL, GASOLINE), 3, PG III (D001 D008 D018), FPC 23°C	003	Dm	00900	P	D001	D008	D018	
							OUTS206H		
X	3. RQ, UN3266, WASTE CORROSIVE LIQUID, BASIC, INORGANIC, N.O.S., (SODIUM HYDROXIDE, POTASSIUM HYDROXIDE), 8, PG II (D002)	001	DF	00450	P	D002			
	4. NONE, NON HAZARDOUS, NON D.O.T. REGULATED, (OILY DEBRIS), N/A	002	Dm	00640	P	NONE			
							OUTS4081		
14. Special Handling Instructions and Additional Information 1. CH381343 1X55 Dm ERG#128 2. CH381271 2X55 Dm ERG#128 3. CH381373 1X55 DF ERG#154 4. CH381369 2X55 Dm					AR Fac. Clean Harbors El Dorado LLC 200 American Circle, El Dorado AR 71730 PH (870)869-7175				
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/Offeor's Printed/Typed Name DAGUID LA CRUZA (FRADONA)					Signature <i>[Signature]</i>			Month Day Year 7/16/09	
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____									
17. Transporter Acknowledgment of Receipt of Materials									
Transporter 1 Printed/Typed Name Richard Diaz RIVERA					Signature <i>[Signature]</i>			Month Day Year 07/16/09	
Transporter 2 Printed/Typed Name Richard Diaz RIVERA					Signature <i>[Signature]</i>			Month Day Year 07/16/09	
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. H040		2. H040		3. H141		4. H040			
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 Kim Stawick					Signature <i>[Signature]</i>			Month Day Year 08/10/09	

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)	21. Generator ID Number PRR000018258	22. Page 2 of 2	23. Manifest Tracking Number 002085679FLE
---	--	---------------------------	---

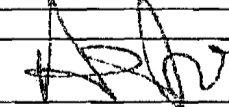
24. Generator's Name
Dana Transport Inc

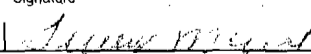
25. Transporter 3 Company Name **Horizon Lines Puerto Rico** U.S. EPA ID Number **PRD980827022**

26. Transporter 4 Company Name **CLEAN HANDS ENV SERVICES** U.S. EPA ID Number **MAD 039322250**

27a HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers		29. Total Quantity	30. Unit Wt./Vol.	31. Waste Codes		
		No.	Type					

32. Special Handling Instructions and Additional Information

33. Transporter 3 Acknowledgment of Receipt of Materials
 Printed/Typed Name **Jesus Sotelo** Signature  Month **07** Day **23** Year **09**

34. Transporter 4 Acknowledgment of Receipt of Materials
 Printed/Typed Name **FRANCO MANUEL** Signature  Month **08** Day **07** Year **09**

35. Discrepancy

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

1114109 GENERATOR TRANSPORTER DESIGNATED FACILITY

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

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator ID Number <i>PRR0000018759</i>	22. Page <i>3/3</i>	23. Manifest Tracking Number <i>802095879FUE</i>
--	--	---	------------------------	---

24. Generator's Name
Dana

25. Transporter Company Name *Sam Hart* U.S. EPA ID Number *PAW039322250*

26. Transporter Company Name U.S. EPA ID Number

27a HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers		29. Total Quantity	30. Unit Wt./Vol.	31. Waste Codes		
		No.	Type					
	<i>HPD</i>							

32. Special Handling Instructions and Additional Information

33. Transporter Acknowledgment of Receipt of Materials
Printed/Typed Name *May Lee* Signature *May Lee* Month *8* Day *19* Year

34. Transporter Acknowledgment of Receipt of Materials
Printed/Typed Name Signature Month Day Year

35. Discrepancy

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

